1 2 3 4 5 6	DAVID R. ZARO (BAR NO. 124334) JOSHUA A. DEL CASTILLO (BAR NO KENYON HARBISON (BAR NO. 2604 ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP 515 South Figueroa Street, Ninth Floor Los Angeles, California 90071-3309 Phone: (213) 622-5555 Fax: (213) 620-8816 E-Mail: dzaro@allenmatkins.com jdelcastillo@allenmatkins.com kharbison@allenmatkins.com	0. 239015) 16)
8	Attorneys for Receiver STEPHEN J. DONELL	
9	UNITED STATES	DISTRICT COURT
10	CENTRAL DISTRI	CT OF CALIFORNIA
11		
12	SECURITIES AND EXCHANGE	Case No. 5:15-CV-02387-SVW (KKx)
13	COMMISSION,	FIRST INTERIM APPLICATION FOR PAYMENT OF FEES AND
14	Plaintiff,	REIMBURSEMENT OF EXPENSES OF RECEIVER'S COUNSEL ALLEN
15	v. ROBERT YANG, et al.,	MATKINS LECK GAMBLE MALLORY & NATSIS LLP
16	Defendants,	[Notice of Applications for Payment of
17	YANROB'S MEDICAL, INC., et al.,	Fees and Reimbursement of Expenses; First Interim Application of Receiver,
18	Relief Defendants.	Stephen J. Donell, and Forensic Accountant, Brandlin & Associates;
19		Memorandum of Points and Authorities; Declaration of Stephen J. Donell; and
20		[Proposed] Order submitted concurrently herewith]
21		Date: July 11, 2016
22		Time: 1:30 p.m. Ctrm: 6
23		Judge: Hon. Stephen V. Wilson
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25		
26		
27		
28		FIRST INTERIM APPLICATION FOR

LAW OFFICES

Allen Matkins Leck Gamble
Mallory & Natsis LLP

FIRST INTERIM APPLICATION FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER'S COUNSEL ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS

### I. <u>INTRODUCTION</u>

Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), counsel of record for Stephen J. Donell (the "Receiver"), the Court-appointed permanent receiver for Defendants Suncor Fontana, LLC, Suncor Hesperia, LLC, Suncor Care Lynwood, LLC, and their respective subsidiaries and affiliates (collectively, the "Receivership Entities" or "Entities") hereby submits this First Interim Application for Payment of Fees and Reimbursement of Expenses (the "Application"). The Application covers the period from the inception of the receivership through March 31, 2016 (the "Application Period").

As reflected below, during the Application Period, Allen Matkins spent a total of 519.7 hours working on behalf of the Receivership Entities, at a weighted average hourly rate of \$461.08 per hour, for fees totaling \$239,621.40. In addition, Allen Matkins incurred \$9,648.33 in expenses. In accordance with this Court's prior orders, Allen Matkins now requests that the Court approve the \$239,621.40 in fees and \$9,648.33 in expenses incurred during the Application Period, and enter an Order authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred (\$191,697.12) and 100% of expenses incurred (\$9,648.33).

## II. GENERAL SUMMARY

As reflected in his previous submissions to this Court, during the Application Period, the Receiver made substantial progress in satisfaction of his duties as determined by the Court in its December 11, 2015 Preliminary Injunction, Order Appointing Receiver, Freezing Assets, and Providing for Other Ancillary Relief ("Appointment Order"). Among other things, the Receiver has, with Allen Matkins' advice and assistance: (1) marshalled real and personal property assets of the Receivership Entities; (2) undertaken an extensive document recovery, review, and analysis effort in connection with the business and financial activities of the Receivership Entities and completed a detailed Forensic Accounting Report and

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Amended Forensic Accounting Report; (3) recovered nearly \$2.4 million in cash 1 assets for the benefit and administration of the Receivership Entities ("Receivership Assets" or "Assets"); (4) identified at least another \$2.5 million in cash Assets potentially available for recovery and subject to the turn-over requirements of the 4 Appointment Order; (5) confirmed that Receivership Assets are implicated in at 5 least 4 real properties owned, directly or indirectly by the Entities, and 1 real 6 property owned by Relief Defendant Yanrob's Medical, Inc. ("Yanrob") 7 8 (collectively, the "Projects"); (6) completed a review of and marketing and disposition plan forthe Projects, including obtaining brokers' opinions of value for the Projects(7) continued his review and administration of pending state court 10 litigation matters affecting or relating to the Receivership Entities, and maintained 11 the status quo in such matters; and (8) communicated with investors (and counsel 12 for investors) in the Receivership Entities regarding the status of the receivership, 13 issues relating to investor immigration petitions, and registration via the Receiver's 14 15 website. Given the amount and nature of the work completed by the Receiver's counsel 16 in furtherance of the Receiver's duties, Allen Matkins and the Receiver respectfully 17 submit that the fees and expenses incurred during the Application Period are 18 19 appropriate. Allen Matkins and the Receiver therefore request that the Court 20 approve Allen Matkins' fees in the amount of \$239,621.40, and expenses in the 21 amount of \$9,648.33. Again, as an accommodation to the Entities' estate, Allen Matkins requests that the Court enter an order authorizing payment of 80% of its 22 fees (in the amount of \$191,697.12) and 100% of its expenses (in the amount of 23 \$9,648.33), on an interim basis, at this time. 24 25 /// 26 27 /// 28 FIRST INTERIM APPLICATION FOR

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## III. SERVICES PERFORMED BY ALLEN MATKINS DURING THE APPLICATION PERIOD AS COUNSEL TO THE RECEIVER.

The order approving the Receiver's engagement of Allen Matkins was entered on March 8, 2016<sup>1</sup> (See Dkt. No. 46.). The Receiver selected Allen Matkins as his general counsel because of the firm's extensive experience and expertise in federal equity receiverships, as well as bankruptcy and litigation matters. Allen Matkins has served as counsel to federal equity receivers in dozens of cases, has represented a variety of entities in bankruptcy matters, and has significant substantive experience in related areas such as corporate and securities laws, real estate, and other matters.

During the Application Period, Allen Matkins staffed each task as efficiently as possible, using a team of core attorneys, with the assistance of specialized expertise as necessary. As the Court may recall, Allen Matkins agreed to discount its ordinary billing rates by 10% and to not adjust its billing rates for attorneys staffed on this matter until January 2017, despite the fact that the firm's rates ordinarily adjust in July of each year.

Detailed descriptions of the services rendered by Allen Matkins are contained in **Exhibit A**, attached hereto. Biographical information of the Allen Matkins attorneys who have rendered significant services to the Receiver during the Application Period are attached as **Exhibit B**. During the Application Period, Allen Matkins recorded its time in the following categories:<sup>2</sup>

## 1. General & Administrative;

The Appointment Order, entered December 11, 2015, had previously authorized the Receiver to engage counsel. Allen Matkins was engaged at that time, but was formally approved as the Receiver's counsel on March 8, 2016 pursuant to the Court's Order in Aid of Receivership.

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FIRST INTERIM APPLICATION FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER'S COUNSEL ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS

While every effort is made to be consistent and accurate in the allocation of activities to the various categories, certain activities may lend themselves to more than one category, or may simply be difficult to categorize. Nevertheless, **Exhibit A** reflects the actual time spent on any given activity and contains an accurate description of the services provided.

2. General Receivership 1 3. 2 Asset Recovery and Administration; 3 4. Investigation/Reporting: 5. Investor Communications; 4 5 6. Sale of Assets/Disposition; 7. Pending Litigation; 6 8. 7 Third Party Claims; and 8 9. Employment & Professional Services. 9 1. General & Administrative 10 The "General & Administrative" category consists largely of expenses related to administrative tasks and Federal Express charges. The following Allen Matkins 11 attorneys and staff billed time to this matter during the Application Period: 12 Title Name Hours 13 Rate K. Harbison Sr. Associate \$445.50 0.1 14 15 **TOTAL:** 0.1 16 **Average Hourly Rate<sup>3</sup>** \$445.50 17 **Total Expenses** 18 19 General Receivership. 2. 20 Services in the "General Receivership" category relate to assisting the 21 Receiver with the administration of the receivership estate. During the Application 22 Period, Allen Matkins attorneys assisted the Receiver in developing methods for 23 identifying and securing Receivership Assets, along with the development of the

All "Average Hourly Rate" entries reflect weighted averages to account for both the discount provided by Allen Matkins and the amount of time each time-keeper billed to a specific category.

Receiver's document recovery and review, and forensic accounting strategy. These

efforts involved significant time spent identifying target entities, sending demand

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PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER'S COUNSEL ALLEN MATKINS LECK GAMBLE **MALLORY & NATSIS** 

FIRST INTERIM APPLICATION FOR

Fees

\$3,330,19

\$44.55

\$44.55

letters, communicating with third-party entities, and assisting with the review of thousands of documents produced in response to such requests.

Allen Matkins also filed notices of the pending receivership and recorded the Appointment Order in other districts. Some time incurred by Allen Matkins in drafting and submitting the Receiver's Motion for Order and Aid of Receivership, the Receiver's Initial Report, and First Quarterly Status Report was also billed to this matter.

Perhaps most importantly, services billed to the General Receivership category include the time devoted to ensuring Receivership Assets were frozen in accordance with the Court's Orders. The following Allen Matkins attorneys and staff billed time to this matter during the Application Period:

<u>Name</u>	<u>Title</u>	Rate	<u>Hours</u>	<u>Fees</u>		
D. Zaro	Partner	\$670.50	1.5	\$1005.75		
J. del Castillo	Partner	\$495.00	33.0	\$16,335.00		
K. Harbison	Sr. Associate	\$445.50	16.0	\$7,128.00		
T. Hsu	Associate	\$378.00	1.4	\$529.20		
M. Zonne	Associate	\$306.00	7.0	\$2,142.00		
G. Lopez	Paralegal	\$238.50	0.5	\$119.25		
TOTAL:			59.4	\$27,259.20		
Average Hourly Rate		\$459.91				
Total Expenses				\$3,605.36		

## 3. <u>Asset Recovery and Administration</u>.

Services in the "Asset Recovery and Administration" category relate directly to the Receiver's efforts to identify, secure, and recover Receivership Assets.

During the Application Period, Allen Matkins assisted the Receiver in his asset recovery efforts, including in preparing demand and asset turnover letters and

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general disposition and preservation plans for various Projects.

subpoenas, reviewing documents, and identifying Receivership Assets, including those related to Yanrob's Medical and its associated operational expenses, and the Receiver's administration of the Projects. In connection with this last issue, Allen Matkins' attorneys handled various issues concerning the Projects, including matters relating to construction, erosion concerns, regulatory issues, land use laws, communications with prospective buyers, management of escrow accounts, and the

Most recently, Allen Matkins drafted and prosecuted the Receiver's pending Ex Parte Application for Order to Show Cause in connection with the Receiver's efforts to secure the turnover of approximately \$2 million in Receivership Assets from Celtic Bank, prepared and addressed notices of pendency of the action in relation to the various Projects, and assisted the Receiver and his forensic accountant with their forensic accounting summary and the preparation of the Forensic Accounting Report. The following Allen Matkins attorneys and staff billed time to this matter during the Application Period:

<u>Name</u>	<u>Title</u>	Rate	<u>Hours</u>	<u>Fees</u>
D. Zaro	Partner	\$670.50	25.4	\$17,030.70
P. Perry	Partner	\$625.50	8.0	\$5,004.00
J. del Castillo	Partner	\$495.00	131.6	\$65,142.00
K. Harbison	Sr. Associate	\$445.50	22.0	\$9,801.00
M. Shapiro	Associate	\$333.00	1.4	\$466.20
M. Zonne	Associate	\$306.00	5.3	\$1,621.80
R. Miltimore	Partner	\$445.50	0.4	\$178.20
TOTAL:			194.1	\$99,243.90
Average Hourly Rate		\$511.30		
<b>Total Expenses</b>				\$199.09

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FIRST INTERIM APPLICATION FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER'S COUNSEL ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS 4. <u>Investigation/Reporting.</u>

Services in the "Investigation/Reporting" category relate to the Receiver's efforts to investigate the nature and location of Receivership Assets, along with the business and financial activities of the Entities, and his preparation of reports to the Court. Allen Matkins assisted the Receiver in connection with the identification, recovery, and review of documents relating to the Receivership Entities and their business and financial activities, and with the compilation and presentation of conclusions derived from these materials to the Court. This effort involved coordinating the development of an initial investigation and discovery plan with the Receiver, identification of appropriate subjects and entities, and the preparation and service of subpoenas and demand letters, as well as communication with attorneys and other representatives for these entities. Throughout this process, Allen Matkins regularly communicated the results and status to the Receiver.

During the Application Period, Allen Matkins also obtained numerous productions in response to its subpoenas and demand letters, from various banks, escrow companies, and other third parties, and reviewed these voluminous productions when necessary to assist the Receiver's efforts. Finally, Allen Matkins prepared the Initial Report of Receiver, Stephen J. Donell, Re: Marshaling And Preservation Of Receivership Assets, And Petition For Further Instructions, filed December 23, 2015 (See Dkt. No. 20.), which summarized the Receiver's efforts and preliminary conclusions. The following Allen Matkins attorneys and staff billed time to this matter during the Application Period:

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#### Title **Hours** Name Rate **Fees** D. Zaro \$670.50 4.9 \$3,285.45 Partner J. del Castillo \$39,105.00 Partner \$495.00 79.0 K. Harbison \$445.50 \$24,413.40 Sr. Associate 54.8 \$113.40 T. Hsu Associate \$378.00 0.3 M. Zonne \$306.00 \$22,735.80 Associate 74.3 Paralegal \$238.50 G. Lopez 0.9 \$214.65 \$89,867.70 **TOTAL:** 214.2 **Average Hourly Rate** \$419.55 **Total Expenses** \$797.73

## 5. Investor Communications.

The time billed to this matter reflects Allen Matkins' assistance to the Receiver in connection with communications with Entity investors and Allen Matkins' direct discussions with investors and investor representatives at the Receiver's behest. During the Application period, Allen Matkins also assisted the Receiver in managing correspondence with investors regarding the status of the receivership, and assisted in developing a plan for specific investor communication issues relating to Chinese translation services and updates posted to the Receiver's Court-approved website. The following Allen Matkins attorneys and staff billed time to this matter during the Application Period:

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<u>Name</u>	<u>Title</u>	Rate	Hours	<u>Fees</u>
J. del Castillo	Partner	\$495.00	9.7	\$4,801.50
K. Harbison	Sr. Associate	\$445.50	0.2	\$89.10
TOTAL:			9.9	\$4,890.60
Average Hourly Rate		\$494.00		

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FIRST INTERIM APPLICATION FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER'S COUNSEL ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS

## 6. <u>Sale of Assets/Disposition.</u>

This category consists of expenses incurred in connection with the analysis of issues relating to the potential disposition of Receivership Assets, with particular attention to the potential sale of the individual Projects. The following Allen Matkins attorneys and staff billed time to this matter during the Application Period:

<u>Name</u>	<u>Title</u>	Rate	<u>Hours</u>	<u>Fees</u>
D. Zaro	Partner	\$670.50	.4	\$268.20
J. del Castillo	Partner	\$495.00	6.1	\$3,019.50
TOTAL:			6.5	\$3,287.70
Average Hourly Rate		\$505.80		

## 7. <u>Pending Litigation</u>.

Services provided in the "Pending Litigation" category during the Application Period include the detailed analysis and management of all pre-receivership actions pending against the Receivership Entities, the preparation of materials and attendance at hearings and status conferences in connection with each of those actions, and the preparation of materials necessary to advise all courts in which litigation is pending of the litigation stay included in the Court's Appointment Order. The following Allen Matkins attorneys and staff billed time to this matter during the Application Period:

<u>Name</u>	<u>Title</u>	Rate	<u>Hours</u>	<u>Fees</u>
J. del Castillo	Partner	\$495.00	8.5	\$4,207.50
K. Harbison	Sr. Associate	\$445.50	10.5	\$4,677.75
M. Zonne	Associate	\$306.00	10.4	\$3,182.40
TOTAL:			29.4	\$12,067.65
Average Hourly Rate		\$410.46		
<b>Total Expenses</b>				\$1,715.96

## 8. Third Party Claims.

During the Application Period, Allen Matkins communicated with a third party claimant regarding a pending claim against a Receivership Entity. The following Allen Matkins attorneys and staff billed time to this matter during the Application Period:

<u>Name</u>	<u>Title</u>	Rate	<u>Hours</u>	<u>Fees</u>
K. Harbison	Sr. Associate	\$445.50	1.2	\$534.60
TOTAL:			1.2	\$534.60
Average Hourly Rate		\$445.50		

## 9. <u>Employment & Professional Services.</u>

During the Application Period, Allen Matkins worked with the Receiver to identify all supplemental administrative relief the Receiver deemed appropriate for the administration of the present receivership, including with respect to providing interested parties with notice, securing Court approval of professional engagements, and prepared and filed the Receiver's Motion for Order in Aid of Receivership and supporting materials (See Dkt. Nos. 30-32.). The following Allen Matkins attorneys and staff billed time to this matter during the Application Period:

<u>Name</u>	<u>Title</u>	Rate	<u>Hours</u>	<u>Fees</u>
J. del Castillo	Partner	\$495.00	4.9	\$2,425.50
TOTAL:			4.9	\$2,425.50
Average Hourly Rate		\$495.00		

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## IV. THE FEES AND EXPENSES ARE REASONABLE AND SHOULD BE ALLOWED.

Allen Matkins respectfully submits that the fees and expenses it incurred in its representation of the Receiver during the Application Period were fair, reasonable, and necessary,, and significantly benefitted the estate of the Receivership Entities. Accordingly, Allen Matkins requests that this Court approve the fees and expenses incurred, and authorize the interim payments requested herein.

Specifically, the billing rates of Allen Matkins personnel are comparable to those charged in the community on similarly complex matters. Further, the billing statements of Allen Matkins were submitted to the Commission for review prior to the filing of this Application. The Commission has indicated it will not oppose the Application.

Moreover, and as noted above, Allen Matkins seeks payment of \$191,697.12 fees, or 80% of the fees incurred during the Application Period, in recognition of the fact that its work in assisting the Receiver is ongoing. Payment of the remaining 20% of its fees will be deferred to the submission of the Receiver's and his professionals' final fee applications, and Allen Matkins will request payment of the 20% holdback at the conclusion of the receivership.

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FIRST INTERIM APPLICATION FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER'S COUNSEL ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS

1	V. <u>CONCLUSION.</u>						
2	For the foregoing reasons, Allen Matkins respectfully requests that the Court						
3	enter an order approving Allen Matkins' fees in the amount of \$239,621.40, its						
4	expenses in the amount of \$9,648.33, and authorizing the Receiver to pay Allen						
5	Matkins, on an interim basis, 80% of its fees incurred, in the amount of						
6	\$191,697.12, and 100% of its expenses, in the amount of \$9,648.33.						
7							
8	Dated: June 3, 2016 ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP						
9	DAVID R. ZARO JOSHUA A. DEL CASTILLO						
10	KENYON HARBISON						
11	By: /s/ Joshua A. del Castillo						
12	JOSHUA A. DEL CASTILLO						
13	Attorneys for Receiver STEPHEN J. DONELL						
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28	FIRST INTERIM APPLICATION FOR						
	PAYMENT OF FEES AND REIMBURSEMENT						

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PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER'S COUNSEL ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS

## **EXHIBIT A**

## Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 2 of 100 Page ID #:1852

05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00001 (General and Administrative) 375525-00001

## Preliminary Billing Form

Billing Atty: 001842 - Joshua Del Castillo

Matter #: 375525-00001

Matter Name: General and Administrative

Date of Last Billing:

Client Name: Stephen J. Donell, Receiver - FedReceiver, Inc.

Proforma Number 1266547 Client/Matter Joint Group # 375525-1

#### Fees for Matter 375525-00001 (General and Administrative)

Trans Dat	e Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
02/25/16	6794530	Revised and sent email to accountants relating to forensic accounting.	Harbison, Kenyon	0.1	44.55	44.55	WO HD TR

### Disbursements for Matter 375525-00001 (General and Administrative)

Trans Date	Index	Туре	Quantity	Amt	Circle Action
12/16/15	2198360	Filing Fees Wells One - Filings, Corporate - Filing Fee San Bern Sup Ct Civ Imag ^San Bernardin, CA	1.00	15.00	WO HD TR
12/16/15	2198361	Filing Fees Wells One - Filings, Corporate - Filing Fee San Bern Sup Ct Civ Imag ^San Bernardin, CA	1.00	23.00	WO HD TR
12/16/15	2198362	Filing Fees Wells One - Filings, Corporate - Complaint and San Bern Sup Ct Civ Imag *San Bernardin, CA	1.00	16.00	WO HD TR
12/16/15	2198363	Filing Fees Wells One - Filings, Corporate - Amended Compl San Bern Sup Ct Civ Imag ^San Bernardin, CA	1.00	13.50	WO HD TR
12/16/15	2198364	Filing Fees Wells One - Filings, Corporate - Answer Filed San Bern Sup Ct Civ Imag ^San Bernardin, CA	1.00	3.00	WO HD TR
12/22/15	2198358	Filing Fees Wells One - Filings, Corporate - Filing Fee San Bern Sup Ct Civ Imag ^San Bernardin, CA	1.00	0.50	WO HD TR
12/22/15	2198359	Filing Fees Wells One - Filings, Corporate - Filing Fee San Bern Sup Ct Civ Imag ^San Bernardin, CA	1.00	1.00	WO HD TR

# Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 3 of 100 Page ID #:1853 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00001 (General and Administrative) 375525-00001

Trans Date	Index	Туре	Quantity	Amt	Circle Action
12/29/15	2189069	Filing Fees U.S. District Court of California, Southern District - Filing Fee - Obtain Misc. Case Number	1.00	46.00	WO HD TR
12/29/15	2189070	Filing Fees U.S. District Court - Filing Fee - Obtain Misc. Case Number	1.00	46.00	WO HD TR
12/29/15	2191257	Professional Services First American Title Insurance Company ^16021602103622	1.00	375.10	WO HD TR
12/30/15	2191218	Duplication	182.00	34.58	WO HD TR
12/30/15	2201139	Messenger Federal Express Invoice No: 528169369 928 Ship To: Clerk of the District Court	1.00	12.96	WO HD TR
12/30/15	2201140	Messenger Federal Express Invoice No: 528169369 928 Ship To: Clerk of the District Court	1.00	17.27	WO HD TR
12/30/15	2201141	Messenger Federal Express Invoice No: 528169369 928 Ship To: Clerk of the District Court	1.00	10.08	WO HD TR
01/06/16	2200054	Service of Process Nationwide - CITY NATIONAL BANK ^ 140729	1.00	115.00	WO HD TR
01/11/16	2196152	Production of Documents Bank of America Bank Documents^415067	1.00	165.67	WO HD TR
01/11/16	2196153	Production of Documents East West Bank Bank Documents^011116	1.00	100.52	WO HD TR
01/19/16	2195990	Production of Documents City National Bank - Bank Records	1.00	58.70	WO HD TR
01/19/16	2197274	Telecopier	3.00	6.00	WO HD TR
01/19/16	2200359	Service of Process Pacific Premier Bank ^2016Yang	1.00	216.00	WO HD TR
01/20/16	2197273	Duplication	168.00	31.92	WO HD TR
01/20/16	2203760	Filing Fees Nationwide Legal, LLC Nationwide Legal: LA County Recorders - Ntc of Pendency of Recievership ^ 141062.	1.00	228.50	WO HD TR

## Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 4 of 100 Page ID #:1854 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00001 (General and Administrative) 375525-00001

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Trans Date Index	Туре		Quantity	Amt Circle Action
01/20/16 2203761	Filing Fees Nationwide Legal, L County Recorders - Ntc of Pender 141062.		1.00	279.35 WO HD TR
01/20/16 2203762	Filing Fees Nationwide Legal, L County Recorders - Ntc of Pender 141062.		1.00	279.35 WO HD TR
01/20/16 2203763	Filing Fees Nationwide Legal, L County Recorders - Ntc of Pendin		1.00	254.85 WO HD TR
01/20/16 2203764	Filing Fees Nationwide Legal, L County Recorders - Ntc of Pendin		1.00	254.85 WO HD TR
01/21/16 2203765	Filing Fees Nationwide Legal, L County Recorders - Ntc of Pendin		1.00	352.20 WO HD TR
01/21/16 2203766	Filing Fees Nationwide Legal, L County Recorders - Ntc of Pendin		1.00	352.20 WO HD TR
02/25/16 2210921	Duplication		111.00	21.09 WO HD TR
Proforma Summary				
Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001977	Kenyon Harbison	0.1	445.50	44.55
		0.1	•	44.55
Total Fees		•		44.55
Total Disbursements				3,330.19
Attorney Billing Instruction	ns			
( ) BILL ALL	( ) Ho	ld		
( ) BILL FEES ONLY		ite Off		
( ) BILL COST ONLY	( ) Tra	nnsfer All		
Billing Instructions				
expires 6/30/2016: 10% autom	natic discount on rates			

### Account Summary- As Of 03/31/2016

	Calendar YTD				LTD			
	Total	Fees	Disbursement	Total	Fees	Disbursement		
Worked	4,221.19	891.00	3,330.19	5,023.09	1,692.90	3,330.19		
Unbilled Adj	(1,648.35)	(1,648.35)	0.00	(1,648.35)	(1,648.35)	0.00		
Billed	0.00	0.00	0.00	0.00	0.00	0.00		
Collected	0.00	0.00	0.00	0.00	0.00	0.00		
AR Write Off	(1,648.35)	(1,648.35)	0.00	0.00	0.00	0.00		
	Total	Fees	Cost					
WIP Balance	3,374.74	44.55	3,330.19					
AR Balance	0.00	0.00	0.00					
Unallocated Payment	0.00							
Client Trust Balance	0.00							

#### **Billing Address**

Stephen J. Donell, Receiver - FedReceiver, Inc. FedReceiver Inc 12121 Wilshire Blvd., Suite 301 Los Angeles, CA 90025 ATTN:

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#:1856 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00002 (General Receivership) 375525-00002

### Preliminary Billing Form

Billing Atty: 001842 - Joshua Del Castillo

Matter #: 375525-00002

Matter Name: General Receivership

Date of Last Billing:

Client Name: Stephen J. Donell, Receiver - FedReceiver, Inc.

Proforma Number 1266548 Client/Matter Joint Group # 375525-1

#### Fees for Matter 375525-00002 (General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
12/11/15	6731197	Review pleadings in SEC enforcement action and confer with Receiver re urgent case and estate administration issues (2.5); prepare for and teleconference with Receiver, SEC, and Defendants' counsel (1.1).	Del Castillo, Joshua A.	3.6	1,782.00	1,782.00	WO HD TR
12/11/15	6731943	Review and respond to correspondence re case filing, appointment of receiver, etc. (.2); confer re administration of case, upcoming deadlines, motion for order in aid, upcoming subpoenas, deadlines pursuant to appointment order, etc (.4).	Zonne, Melissa K.	0.6	183.60	1,965.60	WO HD TR
12/14/15	6731324	Evaluate the issues/background of the receivership, scope of order and meeting with Receiver and counsel to address immediate takeover issues (1.2). Work to review documents as to several projects to address potential legal issues with counsel and Receiver (.3).	Zaro, David R.	1.5	1,005.75	2,971.35	WO HD TR
12/14/15	6731188	Prepare for and teleconferences with M. Haide and F. Voigtmann re EB-5 program inquiries and related matters	Del Castillo, Joshua A.	1.0	495.00	3,466.35	WO HD TR

## Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 7 of 100 Page ID #:1857 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00002 (General Receivership) 375525-00002

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		(0.8); prepare follow-up correspondence fro F. Voigtmann re same (0.2).					
12/15/15	6731226	Review and respond to correspondence from Receiver, SEC, and defendants' counsel re case administration matters (0.7); teleconferences with S. Donell re same (0.5).	Del Castillo, Joshua A.	1.2	594.00	4,060.35	WO HD TR
12/15/15	6734277	Create task chart with critical deadlines; (.8) create and update subpoena tracking spreadsheet; (.4)	Zonne, Melissa K.	1.4	428.40	4,488.75	WO HD TR
12/17/15	6733133	Work on C. Kano payment issue including appointment order issues, email to receiver, email to SEC.	Harbison, Kenyon	1.0	445.50	4,934.25	WO HD TR
12/19/15	6735135	Review and respond to correspondence from Receiver's team re case administration matters (0.6); review documents and confer re EB-5 issues (0.2).	Del Castillo, Joshua A.	0.8	396.00	5,330.25	WO HD TR
12/20/15	6734224	Drafted first draft of motion for order in aid of receivership and related review of documents, standards, and collection of necessary information.	Harbison, Kenyon	3.5	1,559.25	6,889.50	WO HD TR
12/21/15	6735141	Review documents and confer with Receiver re EB-5 questions presented by F. Voigtman (0.5); teleconference and e-mails with F. Voigtman re same (0.5); prepare for and teleconference with Receivership team re case administration matters (1.1).	Del Castillo, Joshua A.	2.1	1,039.50	7,929.00	WO HD TR
12/21/15	6743414	Review and update meeting with J. del Castillo re document issues and	Harbison, Kenyon	2.6	1,158.30	9,087.30	WO HD TR

## Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 8 of 100 Page ID #:1858 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00002 (General Receivership) 375525-00002

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		with regard to case administration; email re conformed copies of notices of pending receivership; review of pleadings documents provided by counsel relating to related cases; finalized joint stipulation for filing and emails relating to the same; review re asset freeze and Yanrob's and emails re the same and review of J. del Castillo and receiver emails on this issue; gathering of TIN numbers for receivership and related entities.					
12/22/15	6736698	Teleconferences and e-mails with SEC, Receiver, and M. Hiraide re proposed process for review and payment of Yanrob operational expenses (0.8).	Del Castillo, Joshua A.	0.8	396.00	9,483.30	WO HD TR
12/22/15	6743590	Follow up re additional notices of pending receivership.	Harbison, Kenyon	0.5	222.75	9,706.05	WO HD TR
12/22/15	6770303	Follow up re recording issue with both counties and property ties; (.6) research re cover letter requirements for recording and confer with counsel, First American title personnel, etc. to obtain contact for insuring recording; (.6) arrange for miscellaneous case numbers in all districts; (.1)	Zonne, Melissa K.	1.3	397.80	10,103.85	WO HD TR
12/23/15	6739795	Donell – Suncor: Search documents produced to Rec for Disbursement Requests and Authorizations (.3).	Lopez, George A.	0.3	71.55	10,175.40	WO HD TR
12/27/15	6744505	Draft and revise cover sheets for recording in counties with property addresses	Zonne, Melissa K.	0.9	275.40	10,450.80	WO HD TR
12/28/15	6741686	Confer re appointment order issue re tying order to properties; (.1)	Zonne, Melissa K.	0.2	61.20	10,512.00	WO HD TR

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Trans Date	Index	Description of Service Rendered correspondence re forms 56 (.1)	Timekeeper	Hours	Fees	Sum	Circle Action
12/29/15	6739647	Review and revise draft Motion for Order in Aid of Receivership and confer with counsel re same (0.7).	Del Castillo, Joshua A.	0.7	346.50	10,858.50	WO HD TR
12/29/15	6742029	SEC v. Robert Yang: prepare cover letters to district courts in California to register complaint and preliminary injunction (.2).	Lopez, George A.	0.2	47.70	10,906.20	WO HD TR
12/29/15	6741694	Update deadline chart re completed and new tasks and dates; (.2) confer with C. Hocker re recording of Appointment Order in two counties; (.2) correspondence with G. Lopez re miscellaneous case filing; (.1) review cover letter for district court miscellaneous cases (.2)	Zonne, Melissa K.	0.7	214.20	11,120.40	WO HD TR
12/30/15	6743393	Obtain and review recorded copies of Order; (.2) correspondence re the same (.1)	Zonne, Melissa K.	0.3	91.80	11,212.20	WO HD TR
01/08/16	6767304	Review re: motion for order in aid and correspondence re: the same, including with receiver (0.2); left word with B. Lucas of Weiland (0.1); call with D. Mattoon and follow up email (0.2); review of contractual status and other emails with B. Lucas (0.2); finalized first draft of motion for order in aid memorandum of points and authorities, revised (1.4).	Harbison, Kenyon	2.1	935.55	12,147.75	WO HD TR
01/11/16	6767567	Revised and finalized motion for order in aid (1.8).	Harbison, Kenyon	1.8	801.90	12,949.65	WO HD TR
01/12/16	6751355	Finalize revisions to Motion for Order in Aid and deliver to Receiver for review and comment (0.3); deliver to	Del Castillo, Joshua A.	0.4	198.00	13,147.65	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		SEC to meet and confer in advance of filing (0.1).	•				
01/12/16	6751569	Prepare for and teleconference with Receiver and receivership team re case administration matters (1.1).	Del Castillo, Joshua A.	1.1	544.50	13,692.15	WO HD TR
01/12/16	6767711	Final tweaks to motion for order in aid (0.5); general review of transcripts and other documents additional (0.2).	Harbison, Kenyon	0.7	311.85	14,004.00	WO HD TR
01/13/16	6752044	Review and respond to inquiries regarding case administration issues (0.3).	Del Castillo, Joshua A.	0.3	148.50	14,152.50	WO HD TR
01/13/16	6752765	Prepare for and teleconference with SEC and Receiver re case administration matters (1.0).	Del Castillo, Joshua A.	1.0	495.00	14,647.50	WO HD TR
01/14/16	6768046	Dealing with miscellaneous case number issue in Eastern District.	Harbison, Kenyon	0.1	44.55	14,692.05	WO HD TR
01/15/16	6754611	Confer re status of securing necessary miscellaneous case numbers and recordations of notices of pending receivership against receivership real property assets (0.6).	Del Castillo, Joshua A.	0.6	297.00	14,989.05	WO HD TR
01/25/16	6761841	Attention to case administration issues (1.0).	Del Castillo, Joshua A.	1.0	495.00	15,484.05	WO HD TR
01/26/16	6802875	Review and substantially revise supporting materials for Motion for Order in Aid of Receivership and confer with counsel re same (1.5).	Del Castillo, Joshua A.	1.5	742.50	16,226.55	WO HD TR
01/26/16	6768967	Call with M. Zonne about Mentone notice of pendency (0.1); brief review of motion in aid documents drafted by M. Zonne (0.2); deal with Park case	Harbison, Kenyon	0.4	178.20	16,404.75	WO HD TR

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Trans Date	Index	Description of Service Rendered notice of pendency (0.1).	Timekeeper	Hours	Fees	Sum	Circle Action
01/27/16	6763865	Review and provide final comments on Motion for Order in Aid and confer with counsel re same (1.1); provide documents to Receiver and confirm authority to finalize and file (0.2).	Del Castillo, Joshua A.	1.3	643.50	17,048.25	WO HD TR
01/27/16	6769008	Review and finalize motion for order in aid documents (0.6).	Harbison, Kenyon	0.6	267.30	17,315.55	WO HD TR
01/27/16	6767693	Confer re: the same (.2) phone calls with CBB re: subpoena; (.3) update chart; (.2)	Zonne, Melissa K.	0.7	214.20	17,529.75	WO HD TR
01/28/16	6764847	Finalize all materials for Motion for Order in Aid of Receivership and prepare for filing (0.9).	Del Castillo, Joshua A.	0.9	445.50	17,975.25	WO HD TR
02/01/16	6770606	Follow up re: miscellaneous case number issue (0.1); correspondence and calls re: mechanics liens and general review of case correspondence (0.2).	Harbison, Kenyon	0.3	133.65	18,108.90	WO HD TR
02/01/16	6771888	Email correspondence with T. Donell; (.1)	Zonne, Melissa K.	0.1	30.60	18,139,50	WO HD TR
02/08/16	6775127	Confer with counsel re case administration issues (0.5).	Del Castillo, Joshua A.	0.5	247.50	18,387.00	WO HD TR
02/08/16	6779220	Confer re: Mason document review; (.5) upload Mason database for review; (.3)	Zonne, Melissa K.	0.8	244.80	18,631.80	WO HD TR
02/14/16	6780788	Review and respond to correspondence re case administration issues (0.6).	Del Castillo, Joshua A.	0.6	297.00	18,928.80	WO HD TR
02/17/16	6782526	Teleconference with Receiver re estate and case administration issues (0.6); review documents in	Del Castillo, Joshua A.	2.6	1,287.00	20,215.80	WO HD TR

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Trans Date	Index	Description of Service Rendered anticipation of Rue 26(f) conference (0.5); teleconference with SEC re case status and administrative matters (0.5); participate in Rule 26(f)	Timekeeper	Hours	Fees	Sum	Circle Action
02/18/16	6783593	conference (1.0).  Review order rescheduling status conference and confer with counsel and Receiver re same (0.1).	Del Castillo, Joshua A.	0.1	49.50	20,265.30	WO HD TR
02/19/16	6785623	Review SEC initial disclosures (0.2).	Del Castillo, Joshua A.	0.2	99.00	20,364.30	WO HD TR
02/22/16	6785877	Teleconference with SEC re case administration issues (0.4); prepare for and attend status conference and hearing on Receiver's Initial Report (2.0); confer with counsel re case administration issues (1.0).	Del Castillo, Joshua A.	3.4	1,683.00	22,047.30	WO'HD TR
02/25/16	6789791	Analysis of issues associated with investor EB-5 inquiries (1.5).	Del Castillo, Joshua A.	1.5	742.50	22,789.80	WO HD TR
02/26/16	6790093	Review proposed SEC Stipulation to Continue Trial and confer with SEC re same (0.2); review court filing (0.1)	Del Castillo, Joshua A.	0.3	148.50	22,938.30	WO HD TR
03/01/16	6796505	Meeting with J. del Castillo relating to general tasks and other matters.	Harbison, Kenyon	0.2	89.10	23,027.40	WO HD TR
03/02/16	6796449	Review e-mails and voicemails confer with SEC re Initial Status Report (0.2).	Del Castillo, Joshua A.	0.2	99.00	23,126.40	WO HD TR
03/02/16	6796501	Attend to obtaining miscellaneous case number in Utah District Court.	Harbison, Kenyon	0.1	44.55	23,170.95	WO HD TR
03/03/16	6797113	Confer with SEC re outstanding case administration and related issues (0.7).	Del Castillo, Joshua A.	0.7	346.50	23,517.45	WO HD TR
03/03/16	6824994	Communications with receiver	Harbison, Kenyon	0.6	267.30	23,784.75	WO HD TR

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Trans Date	Index	Description of Service Rendered relating to SEC and documents and	Timekeeper	Hours	Fees	Sum	Circle Action
		trial date (0.4); drafted summary of documents to go to the SEC (0.2).					
03/04/16	6798215	Review and respond to inquiry from SEC re revision to joint status statement (0.1).	Del Castillo, Joshua A.	0.1	49.50	23,834.25	WO HD TR
03/07/16	6799850	Prepare for and attend hearing on Motion for Order in Aid of Receivership (1.5); confer with parties after hearing (0.2).	Del Castillo, Joshua A.	1.7	841.50	24,675.75	WO HD TR
03/07/16	6825235	Draft translation for website notice to investors (0.2).	Hsu, Tim	0.2	75.60	24,751.35	WO HD TR
03/08/16	6803296	Meeting relating to case administration issues (0.2); gather documents and draft letter to Z. Carlyle relating to SEC document requests and email S. Donell (0.4); review order on motion for order in aid and email re: same (0.1).	Harbison, Kenyon	0.7	311.85	25,063.20	WO HD TR
03/08/16	6825218	Prepare translations for website (0.9).	Hsu, Tim	0.9	340.20	25,403.40	WO HD TR
03/09/16	6802893	Review Order in Aid of Receivership and confer with Receiver re same (0.2); provide copy to E. Dean as requested (0.1).	Del Castillo, Joshua A.	0.3	148.50	25,551.90	WO HD TR
03/09/16	6803571	Other review of emails and correspondence and analysis on general handling of receivership matters (0.5).	Harbison, Kenyon	0.5	222.75	25,774.65	WO HD TR
03/11/16	6825210	Email to SEC in response to their query about iDiscovery.	Harbison, Kenyon	0.1	44.55	25,819.20	WO HD TR
03/15/16	6825494	Review and respond to S. Bates relating to updated receivership	Harbison, Kenyon	0.2	89.10	25,908.30	WO HD TR

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Trans Date	Index	<b>Description of Service Rendered</b> accounting (0.2).	Timekeeper	Hours	Fees	Sum	Circle Action
03/16/16	6825216	Provide additional translations per client request (0.3).	Hsu, Tim	0.3	113.40	26,021.70	WO HD TR
03/22/16	6814166	Review correspondence from S. Donell and confer with IRS re receivership status (0.7); confer with Receiver re tax issues and professionals (0.2).	Del Castillo, Joshua A.	0.9	445.50	26,467.20	WO HD TR
03/23/16	6814201	Review materials in anticipation of update call with SEC (0.5); teleconference with SEC (0.5).	Del Castillo, Joshua A.	1.0	495.00	26,962.20	WO HD TR
03/23/16	6814420	Teleconference with S. Donell re case administration matters and prepare emails and inquiries re same (0.6).	•	0.6	-297.00	27,259.20	WO HD TR

## Disbursements for Matter 375525-00002 (General Receivership)

Trans Date	Index	Туре	Quantity	Amt	Circle Action
12/16/15	2199943	Filing Fees Nationwide - SAN BERNARDINO JUSTICE CENTER ^ 140374	1.00	182.25	WO HD TR
12/17/15	2188749	Duplication	324.00	61.56	WO HD TR
12/17/15	2197606	Messenger Federal Express Invoice No: 526875479 977	1.00	10.76	WO HD TR
12/17/15	2197608	Messenger Federal Express Invoice No: 526875479 977	1.00	10.76	WO HD TR
12/17/15	2197609	Messenger Federal Express Invoice No: 526875479 977	1.00	10.76	WO HD TR
12/17/15	2197610	Messenger Federal Express Invoice No: 526875479 977	1.00	10.76	WO HD TR
12/17/15	2197611	Messenger Federal Express Invoice No: 526875479 977	1.00	14.63	WO HD TR
12/17/15	2197612	Messenger Federal Express Invoice No: 526875479 977	1.00	10.76	WO HD TR
12/17/15	2197613	Messenger Federal Express Invoice No: 526875479 977	1.00	10.76	WO HD TR
12/17/15	2197614	Messenger Federal Express Invoice No: 526875479 977	1.00	18.26	WO HD TR

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Trans Date	Index	Туре	Quantity	Amt	Circle Act	ion
12/17/15	2199944	Filing Fees Nationwide - SAN BERNARDINO/CIVIL ^ 140374	1.00	121.25	WO HD	TR
12/17/15	2199945	Messenger Nationwide - ALLEN, MATKINS, LECK, GAMBLE ET AL ^ 140374	1.00	145.05	WO HD	TR
12/18/15	2197607	Messenger Federal Express Invoice No: 526875479 191	1.00	15.76	WO HD	TR
12/23/15	2199940	Other Court Charges Nationwide - ALLEN, MATKINS, LECK, GAMBLE ET AL ^ 140374	1.00	163.00	WO HD	TR
12/23/15	2199941	Messenger Nationwide - USDC/CENTRAL DISTRICT ^ 140374	1.00	4.00	WO HD	TR
12/23/15	2201142	Messenger Federal Express Invoice No: 528169369 977 Ship To: James F Penman, Esq	1.00	10.76	WO HD	TR
12/28/15	2199942	Filing Fees Nationwide - SAN BERNARDINO/CIVIL ^ 140374	1.00	144.25	WO HD	TR
01/04/16	2201143	Messenger Federal Express Invoice No: 528169369 55 Ship To: Stephen Donell	1.00	16.23	WO HD	TR
01/07/16	2203423	Document Search Pacer Service 09/01/2015- 12/31/2015^2505376-Q420	1.00	2.20	WO HD	TR
01/11/16	2201337	Messenger Federal Express Invoice No: 528905652 191 Ship To: Stephen Donell	1.00	16.23	WO HD	TR
01/12/16	2195932	Text Editing <sup>^</sup> TOC/TOA Generation ATTORNEY: 001977	0.90	27.00	WO HD	TR
01/13/16	2201039	Reprographics - CD/DVD	4.00	60.00	WO HD	TR
01/13/16	2213101	Other Court Charges - filing fee to commence miscellaneous case - recorded Preliminary Injunction of receivership action`	1.00	46.00	WO HD	TR
01/14/16	2197275	Duplication	6.00	1.14	WO HD	TR
01/14/16	2201040	Reprographics - CD/DVD	1.00	15.00	WO HD	TR
01/14/16	2201041	Reprographics - CD/DVD	1.00	15.00	WO HD	TR
01/14/16	2201492	Messenger Federal Express Invoice No: 529559067 191 Ship To: Sarah Bates	1.00	10.98	WO HD	TR

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Trans Date	Index	Туре	Quantity	Amt	Circle Action
01/15/16	2199158	Lexis Lexis - Research	1.00	18.40	WO HD TR
01/19/16	2197276	Duplication	10.00	1.90	WO HD TR
01/19/16	2201042	Reprographics - CD/DVD	1.00	15.00	WO HD TR
01/19/16	2201043	Reprographics - CD/DVD	2.00	30.00	WO HD TR
01/19/16	2201044	Reprographics - CD/DVD	1.00	15.00	WO HD TR
01/19/16	2201045	Reprographics - CD/DVD	2.00	30.00	WO HD TR
01/19/16	2201491	Messenger Federal Express Invoice No: 529559067 191 Ship To: Jeffrey Brandlin	1.00	16.23	WO HD TR
01/20/16	2201687	Messenger Federal Express Invoice No: 530297236 191 Ship To: Sarah Bates	1.00	10.98	WO HD TR
01/20/16	2201688	Messenger Federal Express Invoice No: 530297236 191 Ship To: Jeffrey Brandlin	1.00	10.98	WO HD TR
01/20/16	2201689	Messenger Federal Express Invoice No: 530297236 191 Ship To: Mark Hiraide	1.00	10.98	WO HD TR
01/22/16	2197277	Duplication	1.00	0.19	WO HD TR
01/22/16	2201685	Messenger Federal Express Invoice No: 530297236 191 Ship To: Sarah Bates	1.00	10.98	WO HD TR
01/22/16	2201686	Messenger Federal Express Invoice No: 530297236 191 Ship To: Jeffrey Brandlin	1.00	10.98	WO HD TR
01/25/16	2197278	Duplication	5.00	0.95	WO HD TR
01/25/16	2201684	Messenger Federal Express Invoice No: 530297236 842 Ship To: Sarah Bates	1.00	16.23	WO HD TR
01/25/16	2201690	Messenger Federal Express Invoice No: 530297236 191 Ship To: Sarah Bates	1.00	16.23	WO HD TR
01/25/16	2210239	Reprographics - CD/DVD	2.00	30.00	WO HD TR
01/26/16	2201691	Messenger Federal Express Invoice No: 530297236 191 Ship To: Gina Jaramillo	1.00	10.98	WO HD TR

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Trans Date	Index	Туре	Quantity	Amt	Circle Act	tion
01/26/16	2201692	Messenger Federal Express Invoice No: 530297236 191 Ship To: Myra L Di Santo	1.00	10.98	WO HD	TR
01/26/16	2203768	Filing Fees Nationwide Legal, LLC Nationwide Legal: SB County Recorders - Ntc of Pending of Action ^ 141062.	1.00	357.35	WO HD	TR
01/29/16	2203173	Duplication	91.00	17.29	WO HD	TR
01/29/16	2203767	Messenger Nationwide Legal, LLC Nationwide Legal: USDC - Copies to Judge ^ 141062.	1.00	23.00	WO HD	TR
02/01/16	2202148	Production of Documents City National Bank -Re: SEC v. Robert Yang, et al - Research and retrieval time	1.00	78.00	WO HD	TR
02/01/16	2204072	Messenger Federal Express Invoice No: 531035219 42 Ship To: S&J Supply & Co, Inc	1.00	15.89	WO HD	TR
02/02/16	2203174	Duplication	52.00	9.88	WO HD	TR
02/02/16	2204073	Messenger Federal Express Invoice No: 531035219 91 Ship To: Sarah Bates	1.00	16.10	WO HD	TR
02/02/16	2204074	Messenger Federal Express Invoice No: 531035219 91 Ship To: Jeffrey Brandlin	1.00	10.85	WO HD	TR
02/02/16	2208458	Filing Fees Nationwide - SAN BERNARDINO/CIVIL ^ 141391	1.00	113.20	WO HD	TR
02/02/16	2210240	Reprographics - CD/DVD	2.00	30.00	WO HD	TR
02/08/16	2204245	Messenger Federal Express Invoice No: 531770986 77 Ship To: Mark Palin	1.00	10.85	WO HD	TR
02/08/16	2204246	Messenger Federal Express Invoice No: 531770986 77 Ship To: Troy Aykan, Esq	1.00	10.85	WO HD	TR
02/08/16	2204247	Messenger Federal Express Invoice No: 531770986 77 Ship To: Martin G Castillo, Esq	1.00	10.85	WO HD	TR
02/08/16	2204248	Messenger Federal Express Invoice No: 531770986 77 Ship To: C Patrick Milligan, Esq	1.00	10.85	WO HD	TR

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Trans Date	Index	Туре	Quantity	Amt	Circle Act	ion
02/08/16	2208459	Service of Process Nationwide - GBC INTERNATIONAL BANK ^ 141391	1.00	115.00	WO HD	TR
02/08/16	2210008	Telephonic Court Appearance CourtCall San Bernardino Superior Court-San Bernardino Dis Judge Donald Alvarez ^Melissa Zonne	1.00	86.00	WO HD	TR
02/09/16	2204249	Messenger Federal Express Invoice No: 531770986 91 Ship To: Sarah Bates	1.00	10.85	WO HD	TR
02/09/16	2204250	Messenger Federal Express Invoice No: 531770986 91 Ship To: Jeffrey Brandlin	1.00	10.85	WO HD	TR
02/09/16	2204251	Messenger Federal Express Invoice No: 531770986 77 Ship To: Stephen J Donnell	1.00	10.85	WO HD	TR
02/10/16	2207774	Messenger Federal Express Invoice No: 532539935 977 Ship To: Attn Gina Jaramillo	1.00	10.85	WO HD	TR
02/11/16	2205088	Reprographics - Color	1.00	0.25	WO HD	TR
02/17/16	2205708	Reprographics - Color	2.00	0.50	WO HD	TR
02/17/16	2207936	Messenger Federal Express Invoice No: 533290970 191 Ship To: Sarah Bates	1.00	10.85	WO HD	TR
02/17/16	2207937	Messenger Federal Express Invoice No: 533290970 191 Ship To: Jeffrey Brandlin	1.00	10.85	WO HD	TR
02/18/16	2205707	Duplication	2.00	0.38	WO HD	TR
02/18/16	2207935	Messenger Federal Express Invoice No: 533290970 191 Ship To: Sarah Bates	1.00	10.85	WO HD	TR
02/25/16	2210922	Duplication	788.00	149.72	WO HD	TR
03/03/16	2210390	Filing Fees United States District Court Miscellaneous case number	1.00	46.00	WO HD	TR
03/03/16	2214713	Messenger Federal Express Invoice No: 534769675 1977 Ship To: Sarah Bates	1.00	10.85	WO HD	TR

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Trans Date	Index	Туре	Quantity	Amt	Circle Act	ion
03/03/16	2214714	Messenger Federal Express Invoice No: 534769675 1977 Ship To: Jeffrey Brandlin	1.00	10.85	WO HD	TR
03/03/16	2216561	Other Court Charges Nationwide - Other Court Costs ALLEN, MATKINS, LECK, GAMBLE ET AL ^ 142104	1.00	187.00	WO HD	TR
03/03/16	2218724	Reprographics - CD/DVD	2.00	30.00	WO HD	TR
03/04/16	2211295	Text Editing ^Print Documents USER DEFINED 1: 001842	0.10	3.00	WO HD	TR
03/07/16	2214712	Messenger Federal Express Invoice No: 534769675 1928 Ship To:	1.00	14.50	WO HD	TR
03/08/16	2214865	Messenger Federal Express Invoice No: 535524627 1977 Ship To: Zachary T Carlyle	1.00	15.73	WO HD	TR
03/09/16	2214866	Messenger Federal Express Invoice No: 535524627 2191 Ship To: Attn Nalleli Jaquez, Legal O	1.00	17.72	WO HD	TR
03/09/16	2216562	Filing Fees Nationwide - Filing Fees SAN BERNARDINO/CIVIL ^ 142104	1.00	98.25	WO HD	TR
03/09/16	2216563	Messenger Nationwide - Messenger CITY NATIONAL BANK ^ 142104	1.00	23.00	WO HD	TR
03/09/16	2216564	Service of Process Nationwide - Service of Process EAST WEST BANK ^ 142104	1.00	105.00	WO HD	TR
03/09/16	2218725	Reprographics - CD/DVD	1.00	15.00	WO HD	TR
03/11/16	2214869	Messenger Federal Express Invoice No: 535524627 2191 Ship To: Jeffrey Brandlin	1.00	10.78	WO HD	TR
03/14/16	2214867	Messenger Federal Express Invoice No: 535524627 2191 Ship To: Sarah Bates	1.00	10.78	WO HD	TR
03/14/16	2214868	Messenger Federal Express Invoice No: 535524627 2191 Ship To: Jeffrey Brandlin	1.00	10.78	WO HD	TR
03/14/16	2218726	Reprographics - CD/DVD	2.00	30.00	WO HD	TR
03/15/16	2216565	Service of Process Nationwide - Service of Process BANK OF AMERICA ^ 142104	1.00	115.00	WO HD	TR

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Trans Date	Index	Туре	Quantity	Amt Circle Action	
03/15/16	2218727	Reprographics - CD/DVD	2.00	30.00 WO HD TF	₹
03/16/16	2215057	Messenger Federal Express Invoice No: 536297720 1977 Ship To: Zachary T Carlyle	1.00	15.73 WO HD TF	₹
03/22/16	2217740	Reprographics East West Bank Securities and Exchange Commission v. Robert Tang, et al ^15cv02387SVWKKx	1.00	136.27 WO HD TF	?
03/23/16	2217668	Duplication	6.00	1.14 WO HD TF	₹
03/23/16	2220282	Messenger Federal Express Invoice No: 537006429 1977 Ship To: Richard Lieu	1.00	10.78 WO HD TF	₹
03/23/16	2220283	Messenger Federal Express Invoice No: 537006429 2191 Ship To: Jeffrey Brandlin	1.00	10.78 WO HD TF	₹
03/23/16	2220284	Messenger Federal Express Invoice No: 537006429 2191 Ship To: Sarah Bates	1.00	10.78 WO HD TF	₹
03/23/16	2227614	Reprographics - CD/DVD	1.00	15.00 WO HD TF	₹
03/23/16	2227615	Reprographics - CD/DVD	1.00	15.00 WO HD TF	₹
03/30/16	2220408	Messenger Federal Express Invoice No: 537752818 2191 Ship To: Jeffrey Brandlin	1.00	10.78 WO HD TF	₹
03/30/16	2227616	Reprographics - CD/DVD	2.00	30.00 WO HD TF	₹

## **Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David R. Zaro	1.5	670.50	1,005.75
001842	Joshua A. Del Castillo	33.0	495.00	16,335.00
001928	George A. Lopez	0.5	238.50	119.25
001977	Kenyon Harbison	16.0	445.50	7,128.00
002055	Tim Hsu	1.4	378.00	529.20
002191	Melissa K. Zonne	7.0	306.00	2,142.00
		59.4		27,259.20
Total Fees				27,259.20
Total Disbursements				3,605.36

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Attorney	Billing	Instru	ıctions
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(	)	BILL ALL	(	)	Hold	
(	)	BILL FEES ONLY	(	)	Write Off	
(	)	BILL COST ONLY	(	)	Transfer All	
					•	

### **Billing Instructions**

expires 6/30/2016: 10% automatic discount on rates

#### Account Summary- As Of 03/31/2016

	Calendar YTD			LTD			
	Total	Fees	Disbursement	Total	Fees	Disbursement	
Worked	35,073.86	31,360.50	3,713.36	35,073.86	31,360.50	3,713.36	
Unbilled Adj	(749.70)	(641.70)	(108.00)	(749.70)	(641.70)	(108.00)	
Billed	0.00	0.00	0.00	0.00	0.00	0.00	
Collected	0.00	0.00	0.00	0.00	0.00	0.00	
AR Write Off	(749.70)	(641.70)	(108.00)	0.00	0.00	0.00	
	Total	Fees	Cost				
WIP Balance	40,778.54	36,874.80	3,903.74				
AR Balance	0.00	0.00	0.00				
Unallocated Payment	0.00						
Client Trust Balance	0.00				*		

#### **Billing Address**

Stephen J. Donell, Receiver - FedReceiver, Inc. FedReceiver Inc 12121 Wilshire Blvd., Suite 301 Los Angeles, CA 90025 ATTN:

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## Preliminary Billing Form

Billing Atty: 001842 - Joshua Del Castillo

Matter #: 375525-00003

Matter Name: Asset Recovery & Administration

Date of Last Billing:

Client Name: Stephen J. Donell, Receiver - FedReceiver, Inc.

Proforma Number 1266549 Client/Matter Joint Group # 375525-1

#### Fees for Matter 375525-00003 (Asset Recovery & Administration)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
12/11/15	6731199	Teleconference with S. Bates re asset recovery issues (0.2); review documents and prepare turn-over demand to Mason Investments (0.9); review and respond to correspondence from S. Donell re investigation and asset recovery issues (0.4).	Del Castillo, Joshua A.	1.5	742.50	742.50	WO HD TR
12/14/15	6731185	Teleconferences and e-mails with Receiver re estate asset administration matters (0.9).	Del Castillo, Joshua A.	0.9	445.50	1,188.00	WO HD TR
12/15/15	6731340	Review documents/issues related to Hesperia/Fontana construction projects, regulatory issues, erosion control (1.4). Call/meeting with counsel to advise on scope of order/turnover issues, asset recovery as to Hesperia/defendants and relief defendants (1.2).	Zaro, David R.	2.6	1,743.30	2,931.30	WO HD TR
12/16/15	6731282	Confer with Receiver and Receiver staff re issues relating to receivership accounts (0.5); confer re, prepare for, and conference re release of funds for non-receivership operational expenses and status of estate	Del Castillo, Joshua A.	2.0	990.00	3,921.30	WO HD TR

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Trans Date	Index	Description of Service Rendered projects (1.5).	Timekeeper	Hours	Fees	Sum	Circle Action
12/17/15	6733478	Work re construction consultant and experts re project development, follow-up with Receiver re same (.4). Several calls/emails re Hesperia project, erosion control, and related preservation issues (.4). Evaluate issues related to project development, interviews with project management consultants to address expertise (.7).	Zaro, David R.	1.5	1,005.75	4,927.05	WO HD TR
12/17/15	6734761	Review and respond to correspondence from Receiver, Defendants' counsel and others re asset identification, recovery, and administration issues (1.5).	Del Castillo, Joshua A.	1.5	742.50	5,669.55	WO HD TR
12/18/15	6735894	Emails with Receiver related to Receiver contracts, approach to vendors (.4). Review/evaluate contract/agreement with Weiland Davco concerning the project analysis, email advice to counsel/Receiver re case (.6).	Zaro, David R.	1.0	670.50	6,340.05	WO HD TR
12/18/15	6735132	Review and respond to correspondence from Receiver re asset recovery issues and status of operational expense plan for Yanrob's Medical (0.4).	Del Castillo, Joshua A.	0.4	198.00	6,538.05	WO HD TR
12/22/15	6736697	Review documents and review and respond to correspondence from Receiver and third parties re asset recovery and administration (1.8).	Del Castillo, Joshua A.	1.8	891.00	7,429.05	WO HD TR
12/23/15	6740230	Review issues related to the Hesperia Project, control over the asset, advice as to security issues (.6). Attend meetings with architect as well as	Zaro, David R.	4.4	2,950.20	10,379.25	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		with the prime contractor, Receiver, general contractor, Weilnd Davco and defendants as to the Fontana Project (3.8).					
12/23/15	6737570	Review correspondence from S. Donell re GBC bank and commence preparation of turnover letter re same (0.5).; teleconference with Receiver and Receiver's staff rand confer with counsel re turnover of Yanrob funds for purposes of operational expenses (0.9); teleconferences with SEC re same (0.1); correspondence re same (0.5); prepare access letter to Pacific Premier Bank (0.3); review documents and confer with counsel in connection with general estate administration and asset recovery issues (1.2).	Del Castillo, Joshua A.	3.5	1,732.50	12,111.75	WO HD TR
12/24/15	6738193	Review e-mails and documents from S. Donell and J. Donell re turnover of funds and other estate administration matters and prepare responses re same (0.7).	Del Castillo, Joshua A.	0.7	346.50	12,458.25	WO HD TR
12/28/15	6738535	Review materials associated with GBC bank account and requested turnover (0.7); e-mails and teleconferences with S. Donell, C. Jung, and M. Hiraide re same (1.1); analysis of issues associated with potential ex parte application (0.3); confer with counsel and review e-mails re turnover of Yanrob funds for operational expenses (0.8); confer with B. Lucas re Hesperia project issues and review photos re same	Del Castillo, Joshua A.	3.3	1,633.50	14,091.75	WO HD TR

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Trans Date	Index	Description of Service Rendered (0.4).	Timekeeper	Hours	Fees	Sum	Circle Action
12/29/15	6739644	Teleconferences with Receiver, Wieland Davco, M. Hiraide, Z. Carlyle, and various putative estate creditors re asset administration matters and prepare documents in connection with same (3.9).	Del Castillo, Joshua A.	3.9	1,930.50	16,022.25	WO HD TR
12/30/15	6743322	Review and respond to correspondence from Receiver, Defendants, Defendants' counsel, and others regard estate and asset administration matters (1.5); review documents re same (0.7).	Del Castillo, Joshua A.	2.2	1,089.00	17,111.25	WO HD TR
12/31/15	6743343	Review and respond to correspondence re estate administration matters (1.1); confer with Receiver and counsel re site visit to Hesperia project (0.4).	Del Castillo, Joshua A.	1.5	742.50	17,853.75	WO HD TR
12/31/15	6743979	Review and emails re Hesperia site visit (0.2).	Harbison, Kenyon	0.2	89.10	17,942.85	WO HD TR
01/04/16	6745140	Review/evaluate the issues re Hesperia Project, work of Weiland- Davco and assess next steps (.4). Several calls/advice to counsel as to approach to Fontana Project based on preliminary work by Weiland, confer re Celtic Bank (.4).	Zaro, David R.	0.7	469.35	18,412.20	WO HD TR
01/04/16	6744544	Prepare for and teleconference with Celtic Bank and Wieland Davco re Hesperia project and related matters (1.0); confer with Receiver re escrow funds and prepare update and inquiry to SEC re same (0.3); teleconference with Z. Carlyle re escrow funds and Receiver's analysis of same (0.6);	Del Castillo, Joshua A.	2.5	1,237.50	19,649.70	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		confer with Receiver's accountant re GBC bank account and prepare informal document request to GBC's counsel re same (0.2); teleconference with Receiver re immediate issues presenting Hesperia property (0.4).					
01/04/16	6744734	Call with J. del Castillo regarding Hesperia site visit (0.1); attend site visit at Hesperia property (1.6).	Harbison, Kenyon	1.7	757.35	20,407.05	WO HD TR
01/05/16	6745453	Review and respond to correspondence regarding status of receivership projects and pending administrative issues (1.5); review and revise draft release agreement with City of Hesperia re Hesperia project and confer with counsel re same (0.9); review documents associated with receivership projects and prepare action items for receivership team (1.5).; teleconference with SEC re Hesperia escrow account and confirmation that funds will be treated as Hesperia estate assets (0.2); review correspondence from SEC re Lynwood escrow account and prepare turnover demand to Park Place Escrow re same (0.3).	Del Castillo, Joshua A.	4.4	2,178.00	22,585.05	WO HD TR
01/05/16	6746322	Call with J. del Castillo relating to site visit (0.1).	Harbison, Kenyon	0.1	44.55	22,629.60	WO HD TR
01/06/16	6745828	Review e-mail from N. Woodward and prepare update and inquiry to client re status of Lynwood escrow and related matters (0.3); prepare detailed response to N. Woodward (0.2); confer with S. Donell re notice of		1.4	693.00	23,322.60	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		inadvertent ACH transfer from Celtic Bank and confer with Receiver and Celtic Bank re same (0.7); teleconference re same (0.2).					
01/07/16	6749117	Review issues related to Fontana, status of construction/contractor issues and lien rights, advice re same (.6).	Zaro, David R.	0.6	402.30	23,724.90	WO HD TR
01/07/16	6747730	Review and respond to correspondence re document and asset turnover demands to Park Place Escrow and confer with counsel re same (0.5); confer with Receiver and counsel re apparent attempt by individual defendants to withdraw assets from frozen bank accounts and prepare update and inquiry to defendants' counsel re same (0.5).	Del Castillo, Joshua A.	1.0	495.00	24,219.90	WO HD TR
01/08/16	6750356	Email/follow-up on the Receiver's obligations as to the Hesperia property and advise to counsel related to next steps (.4); Assess documents/accounting records as to Fontana project and follow-up thereon (.3).	Zaro, David R.	0.7	469.35	24,689.25	WO HD TR
01/08/16	6749627	Confer with Receiver, SEC, and counsel re asset identification, recovery, and related efforts (2.3); specific correspondence with SEC, Receiver, and M. Hiraide re defendants' undisclosed Yanrob accounts and withdrawals (0.5).	Del Castillo, Joshua A.	2.8	1,386.00	26,075.25	WO HD TR
01/08/16	6767300	Correspondence and initial efforts regarding recovery of funds relating to Lynwood, call to Gina Jaramillo (0.2);	Harbison, Kenyon	0.5	222.75	26,298.00	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		drafted email letter to CNB and related correspondence (.03).					
01/11/16	6751064	Call with counsel/Receiver related to assets and turnover issues and follow-up on the matter (.4).	Zaro, David R.	0.4	268.20	26,566.20	WO HD TR
01/11/16	6751084	Review and respond to correspondence re status of asset recovery efforts and related matters (0.5).	Del Castillo, Joshua A.	0.5	247.50	26,813.70	WO HD TR
01/11/16	6767568	Follow up with S. Donell about status of wires (0.1).	Harbison, Kenyon	0.1	44.55	26,858.25	WO HD TR
01/12/16	6755687	Call with counsel to address the diversion of funds by defendant (.2). Review the issues related to potential claw back transfers from third parties (.3).	Zaro, David R.	0.5	335.25	27,193.50	WO HD TR
01/12/16	6751354	Review and respond to correspondence and telephone calls re asset administration and recovery issues, including funds obtained from escrow and outstanding turn-over requests to banks (1.6); confer with counsel re same (0.2).	Del Castillo, Joshua A.	1.8	891.00	28,084.50	WO HD TR
01/12/16	6767713	Call with E. Acosta of CNB about Yanrob's account and follow up (0.2); email to S. Bates about status of the properties and review of title reports (0.3).	Harbison, Kenyon	0.5	222.75	28,307.25	WO HD TR
01/12/16	6752430	Email correspondence re: Park place; (.2) draft memo to D. Zaro re: status of discovery/asset recovery; (1.3).	Zonne, Melissa K.	1.5	459.00	28,766.25	WO HD TR
01/13/16	6752043	Review materials forwarded by S. Donell re Mentone property and	Del Castillo, Joshua A.	1.8	891.00	29,657.25	WO HD TR

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Trans Date	Index	Description of Service Rendered confer with counsel re same (1.7); review voicemails from S. Donell (0.1).	Timekeeper	Hours	Fees	Sum	Circle Action
01/13/16	6767878	Call with S. Bates about property status issues (0.2); confer re: revisions to status memorandum (0.1).	Harbison, Kenyon	0.3	133.65	29,790.90	WO HD TR
01/14/16	6756955	Review/evaluate the documents re Mentone Project, assess approach to recovery (.6). Call with counsel to advise re Mentone Project construction (.2).	Zaro, David R.	0.8	536.40	30,327.30	WO HD TR
01/14/16	6753655	Review and respond to correspondence from Receiver, Park Place Escrow, and others regarding production of documents relating to receivership assets (0.8); review documents in connection with asset identification and recovery (1.1); confer with Receiver and title company re Mentone property (0.3).	Del Castillo, Joshua A.	2.2	1,089.00	31,416.30	WO HD TR
01/15/16	6754609	Review documents provided by Receiver and third parties in connection with identified and/or recovered receivership assets and confer with Receiver's team and counsel re same (1.7).	Del Castillo, Joshua A.	1.7	841.50	32,257.80	WO HD TR
01/15/16	6768088	Call with T. Donell about case administration issues relating to Lynwood and long email to team about the same (0.6).	Harbison, Kenyon	0.6	267.30	32,525.10	WO HD TR
01/15/16	6768090	Correspondence with M. Shapiro and others relating to Mentone Property issues (0.2).	Harbison, Kenyon	0.2	89.10	32,614.20	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
01/15/16	6757748	Analysis re: Lynwood property; (.1) analysis re: turnover funds; (.1) draft notice of pendens for Fontana property; (.4) draft legal descriptions as exhibits to Notices for all three properties; (.4).	Zonne, Melissa K.	1.0	306.00	32,920.20	WO HD TR
01/16/16	6755367	Review and respond to correspondence re asset identification and recovery (0.5); analysis of legal arguments re GBC bank account (0.8).	Del Castillo, Joshua A.	1.3	643.50	33,563.70	WO HD TR
01/18/16	6755676	Review purchase agreement for seller obligations. Internal discussion re same.	Shapiro, Maxwell	1.2	399.60	33,963.30	WO HD TR
01/19/16	6755948	Prepare for and teleconference with SEC and Receiver re undisclosed Yanrob accounts and withdrawals (0.3).	Del Castillo, Joshua A.	0.3	148.50	34,111.80	WO HD TR
01/19/16	6768374	Review and follow up re: M. Shapiro Mentone project (0.1); call to counsel for CNB regarding Yanrob's account turnover (0.1).	Harbison, Kenyon	0.2	89.10	34,200.90	WO HD TR
01/19/16	6756907	Continue review of file re entitlement documentation.	Shapiro, Maxwell	0.2	66.60	34,267.50	WO HD TR
01/20/16	6757087	Teleconferences, e-mails, and review of materials associated with asset preservation and administration matters (1.9).	Del Castillo, Joshua A.	1.9	940.50	35,208.00	WO HD TR
01/20/16	6768453	Correspondence and calls relating to Mentone APN issues and legal description issues relating to Mentone notice of pendency of receivership (0.5); email about documents Hiraide	Harbison, Kenyon	0.6	267.30	35,475.30	WO HD TR

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Trans Date	Index	Description of Service Rendered requires (0.1).	Timekeeper	Hours	Fees	Sum	Circle Action
01/20/16	6768455	Left word with CNB counsel re: turnover letter issues and correspondence with team and with SEC regarding the same (0.2); initial drafting of response letter (0.5).	Harbison, Kenyon	0.7	311.85	35,787.15	WO HD TR
01/20/16	6804676	Review and finalize cover sheets and record notices of pendency in LA and San Bernardino counties; (.4) obtain exhibits ISO motion in aid; (.2) draft S. Donell declaration in support of motion in aid; (.6) draft proposed order re: the same (.6)	Zonne, Melissa K.	1.8	550.80	36,337.95	WO HD TR
01/21/16	6758084	Review letter to Park Place Escrow re Mentone property and forward to buyer's representative for review and execution (0.4); confer with Receiver's office re Mentone property (0.2).	Del Castillo, Joshua A.	0.6	297.00	36,634.95	WO HD TR
01/21/16	6761754	Research re: Mentone property, various legal descriptions; APNs, maps, other materials for identification in notice; (.4) confirm recording of notices of pendency (.1)	Zonne, Melissa K.	0.5	153.00	36,787.95	WO HD TR
01/22/16	6759406	Teleconference, e-mails, and review documents associated with asset administration matters (1.5).; review documents provided in connection with Yanrob PPB account and anticipated receipt of funds and correspondence and teleconference with Receiver's office re same (0.7).; review correspondence and confer re engagement of additional professionals for asset preservation	Del Castillo, Joshua A.	2.9	1,435.50	38,223.45	WO HD TR

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Trans Date	Index	Description of Service Rendered and development purposes (0.7).	Timekeeper	Hours	Fees	Sum	Circle Action
01/23/16	6760732	Review and respond to correspondence re Mentone property (0.2).	Del Castillo, Joshua A.	0.2	99.00	38,322.45	WO HD TR
01/23/16	6768780	Finalized demand letter follow up to CNB relating to their refusal to turn over Yanrob's funds (0.7).	Harbison, Kenyon	0.7	311.85	38,634.30	WO HD TR
01/25/16	6768895	Finalized and sent letter to CNB in follow up to demand, and email to S. Donell (0.2).	Harbison, Kenyon	0.2	89.10	38,723.40	WO HD TR
01/26/16	6804689	Correspondence with First American re: Mentone property issue; (.2) correspondence and analysis re: Mentone property notice of pendency; (.1) revise and finalize re: the same (.2).	Zonne, Melissa K.	0.5	153.00	38,876.40	WO HD TR
01/28/16	6764608	Confer with SEC re Yang request re post-receivership medical practice administration issues (0.4); confer with client re same (0.4); teleconference with SEC and M. Hiraide re Receiver's position on same (0.4); prepare update and inquiry to A. Donell re resubmission of payment for Yanrob/Yang malpractice insurance and confer re same (0.3).	Del Castillo, Joshua A.	1.5	742.50	39,618.90	WO HD TR
01/29/16	6768105	Review and respond to correspondence from Receiver, SEC, and M. Hiraide re asset identification and recovery (1.0); administration of existing asset pool, review documents and confer in connection with Mentone property (0.6).	Del Castillo, Joshua A.	1.6	792.00	40,410.90	WO HD TR
02/01/16	6769194	Review documents in connection with	Del Castillo, Joshua	3.1	1,534.50	41,945.40	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		Fontana cost to complete and related asset administration matters and confer with Receiver and counsel re same (1.6); review mechanics lien for Fontana and prepare appropriate cease and desist letter (0.5); confer with S. Donell re issues associated with Fontana contractors and review documents in connection with same (0.8); analysis of issues relating to purported Celtic Bank lien issue (0.2).	A.				
02/02/16	6771174	Assess the offer of defendant concerning practice and recovery of assets transferred out of estate or issued by Defendant, and recovery of the funds (.4). Address the Celtic bank issues as to deposit account and advice to counsel re same (.3).	Zaro, David R.	0.7	469.35	42,414.75	WO HD TR
02/02/16	6770063	Confer with Receiver, counsel, and Wieland Davco re project administration issues (0.7); review and respond to correspondence from Celtic Bank re Fontana project and emails with Receiver re same (0.5); review documents associated with Fontana project (0.4); attempt to contact J. Karr re IOR reports for Fontana project (0.2); teleconference with J. Kirkland re IOR reports and status of OSHPD records (0.2); prepare for and teleconference with S. Donell re estate and property administration matters (1.0); correspondence re same (0.5); confer with counsel and prepare draft release form (1.0).	Del Castillo, Joshua A.	4.5	2,227.50	44,642.25	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action	
02/03/16	6771017	Teleconference with R. Miltimore re Mentone property and land use requirements as condition of sale (0.5); review documents and provide update to Receiver re same (0.3); prepare for and teleconference with Celtic Bank and Receiver re Fontana project and receivership dollars held by Celtic Bank (0.9); prepare for and teleconference with M. Hiraide re asset administration matters (1.2).	Del Castillo, Joshua A.	2.9	1,435.50	46,077.75	WO HD TR_	
02/04/16	6772160	Review correspondence from Receiver and forensic accountant re tracing of Celtic Bank funds and confer re same (0.5); review documents in connection with Park funds diverted to Celtic Bank and commence preparation of summary of argument (1.4); review and respond to correspondence from R. Karr re turn-over of documents relating to Fontana project construction (0.2); review correspondence re non-reliance letter with Celtic Bank, confer with Receiver re same, and revise in accordance with Receiver's instructions (0.6); teleconference with R. Karr re IOR reports (0.3); prepare updates re same (0.3); prepare release forms requested by Receiver (0.4).	Del Castillo, Joshua A.	3.7	1,831.50	47,909.25	WO HD TR_	
02/04/16	6776874	Prepare issues list for PSA.	Miltimore, Richard	0.4	178.20	48,087.45	.WO HD TR_	
02/05/16	6775586	Review loan documents regarding the Celtic Bank loan/approach to existing draw requests and lien release issues (.4); Several calls to provide legal	Zaro, David R.	0.7	469.35	48,556.80	WO HD TR_	

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		advise related to mechanic's lien releases (.3).					
02/05/16	6773484	Review and revise Non-Reliance letter and provide final version to L. Rinaldi at Celtic Bank for execution (0.3); revise conditional release form and confer with Receiver's office re same (0.3); teleconference with S. Donell re same (0.2); e-mails with R. Karr re same (0.3); review and respond to third party inquiries re assets (0.9).	Del Castillo, Joshua A.	2.0	990.00	49,546.80	WO HD TR
02/07/16	6774811	Review documents associated with projected asset values and confer re same (1.5).	Del Castillo, Joshua A.	1.5	742.50	50,289.30	WO HD TR
02/08/16	6776763	Review letter/documents re Celtic Bank issues and loan as to Fontana property, assess strategy (.4). Review appraisal as to the Fontana property, assess foreclosure issues (.4). Call/conference with counsel as to Celtic Bank claims, next steps and strategy (.3).	Zaro, David R.	1.1	737.55	51,026.85	WO HD TR
02/08/16	6775130	Review materials forwarded by Receiver and SEC and confer with Receiver and counsel re asset administration and valuation matters (1.6); correspondence with R. Karr re IOR reports and required release (0.3); confer with interested parties re Fontana project status and Celtic Bank loan issues (1.1); teleconference with Receiver re ordinary course payments and pending invoices (0.3).	Del Castillo, Joshua A.	. 3.3	1,633.50	52,660.35	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
02/09/16	6776627	Confer re J. Karr IOR Reports and issues re Fontana Project (0.5); confer with counsel re land use issues associated with Mentone property and prepare outline for discussion with Receiver re same (1.2); teleconference with Receiver re Mentone property (0.3); prepare update and inquiry to M. Hiraide (0.2); confer with counsel and review and respond to correspondence from Receiver re real property asset administration (1.0).	Del Castillo, Joshua A.	3.2	1,584.00	54,244.35	WO HD TR
02/09/16	6793316	Dealing with Rodney Karr Waiver issue, multiple emails and review and meeting (0.7).	Harbison, Kenyon	0.7	311.85	54,556.20	WO HD TR
02/10/16	6777721	Review correspondence from Receiver relating to valuation of estate assets and confer re same (1.5); prepare update and inquiry to M. Hiraide re same (0.3).	Del Castillo, Joshua A.	1.8	891.00	55,447.20	WO HD TR
02/10/16	6793397	Email re: four recent attorney demand letters (0.1); drafted letter to Park Place in follow up meet and confer re: discovery then revised, finalized and sent (0.5); reply re: Mason review query (0.1).	Harbison, Kenyon	0.7	311.85	55,759.05	WO HD TR
02/11/16	6781316	Work on issues re: Celtic Bank/turnover, Fontana Project, preservation of value/contractor claims, and advice concerning legal issues (.4).	Zaro, David R.	0.4	268.20	56,027.25	WO HD TR
02/11/16	6778839	Review documents and confer with Receiver re asset administration and eventual disposition issues (1.5).	Del Castillo, Joshua A.	1.5	742.50	56,769.75	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle A	ction
02/11/16	6793422	Dealing with address issues relating to receiver (0.1); review of various case emails including relating to building disposition (0.3).	Harbison, Kenyon	0.4	178.20	56,947.95	WO HI	) TR
02/11/16	6793426	Organizing and coordinating re: Mentone documents (0.2).	Harbison, Kenyon	0.2	89.10	57,037.05	WO H	D TR
02/12/16	6780764	Review contractor voicemail forwarded by S. Donell re Defendants' interference with administration of Hesperia project and confer re same (0.4); prepare update and demand to M. Hiraide re same (0.2); review and respond to correspondence re funds on deposit with Celtic Bank and subject to receivership recovery (0.3); review documents re same (1.0).	Del Castillo, Joshua A.	1.9	940.50	57,977.55	WO HI	O TR
02/12/16	6793482	Initial drafting of Celtic Bank letter and review of documents and communications relating to the same, largely spent on understanding the economic/tracing analysis and review of transcript (0.8).	Harbison, Kenyon	0.8	356.40	58,333.95	WO HI	O TR
02/14/16	6780794	Analysis of documents re designation as receivership assets (0.6).	Del Castillo, Joshua A.	0.6	297.00	58,630.95	WO H	) TR
02/14/16	6780824	Review correspondence re Celtic Bank loan status and disbursements and confer re same (0.5).	Del Castillo, Joshua A.	0.5	247.50	58,878.45	WO HI	D TR
02/16/16	6783597	Review additional issues re: Celtic Bank lien/scope of claim and lien on the assets (.4). Call related to the project in Lynwood, follow-up to address documentation of value/equity and alternate approaches (.3). Review Mentone	Zaro, David R.	1.4	938.70	59,817.15	WO HI	D TR

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Trans Date	Index	Description of Service Rendered land use obstacles faced by Receiver re: Mentone development, follow-up	Timekeeper	Hours	Fees	Sum	Circle Action
		with counsel and Receiver (.7).					
02/16/16	6780874	Review documents and confer with counsel re tracing of Celtic Bank funds and status of turn-over demand (0.7); prepare update and inquiry to M. Hiraide re Defendants' interference with Receiver's estate administration (0.1); review documents in connection with status and valuation of assets and confer with Receiver's team and counsel re same (1.3); teleconference with M. Hiraide re asset administration matter (1.1).	Del Castillo, Joshua A.	3.3	1,633.50	61,450.65	WO HD TR
02/16/16	6793534	Further review of documents and tracing analysis relating to Celtic Bank and related communications with T. Donell and others (0.6)	Harbison, Kenyon	0.6	267.30	61,717.95	WO HD TR
02/17/16	6782425	Review materials forwarded by Receiver and confer re asset administration matters (1.0); prepare outline for pending letter to Defendants' counsel re same (0.2).	Del Castillo, Joshua A.	1.2	594.00	62,311.95	WO HD TR
02/18/16	6783746	Teleconference with Mentone buyer re PSA status and necessary revisions to agreement in event sale moves forward (0.5); confer with Receiver re same (0.3); confer with counsel re same (0.2).	Del Castillo, Joshua A.	1.0	495.00	62,806.95	WO HD TR
02/18/16	6794025	Additional review of new documents relating to Celtic Bank and tracing and long email to R. Lieu of accounting firm (0.9);	Harbison, Kenyon	0.9	400.95	63,207.90	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
02/19/16	6785620	Confer with Receiver team and counsel re Receiver expenditures on Yanrob operational expenses and related issues (0.6); confer re Mentone PSA and preconditions to sale (1.5).	Del Castillo, Joshua A.	2.1	1,039.50	64,247.40	WO HD TR
02/22/16	6787495	Review issues regarding annexation and tract map approval, in connection with Redlands property.	Perry, Patrick A.	0.9	562.95	64,810.35	WO HD TR
02/22/16	6785705	Review voicemail from and teleconference with G. Jaramillo at Park Place Escrow re Receiver's demands (0.5).	Del Castillo, Joshua A.	0.5	247.50	65,057.85	WO HD TR
02/22/16	6794210	Emails to P. Perry relating to Mentone strategy (0.2).	Harbison, Kenyon	0.2	89.10	65,146.95	WO HD TR
02/23/16	6788006	Conference with counsel to address Receiver concerns with the abandonment of properties and liability issues (.3).	Zaro, David R.	0.3	201.15	65,348.10	WO HD TR
02/23/16	6788172	Review issues related to Annexation of Redlands property.	Perry, Patrick A.	0.3	187.65	65,535.75	WO HD TR
02/23/16	6787300	Teleconferences and e-mails with Receiver, M. Hiraide, and counsel re asset administration matters (2.5).	Del Castillo, Joshua A.	2.5	1,237.50	66,773.25	WO HD TR
02/23/16	6794273	Follow up talk and emails re: asset preservation and disposition as to Mentone property (0.1).	Harbison, Kenyon	0.1	44.55	66,817.80	WO HD TR
02/24/16	6789199	Telephone conversation with City Planner regarding status of permit applications (0.8); review property information and draft Public Records Act request (0.8).	Perry, Patrick A.	1.6	1,000.80	67,818.60	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Act	ion
02/24/16	6788092	Confer with land use counsel re information learned from conference with City of Redlands re Mentone property and prepare update to Receiver re same (0.5); confer with prospective buyer for Mentone property and confer with Receiver and counsel re same (0.7).	Del Castillo, Joshua A.	1.2	594.00	68,412.60	WO HD	TR
02/24/16	6794408	Follow up call and emails with accounting firm re: Celtic Bank (0.3); additional review of accounting issues and drafting re: letter to Celtic Bank (0.5).	Harbison, Kenyon	0.8	356.40	68,769.00	WO HD	TR
02/25/16	6790306	Telephone conversations with City Planner regarding entitlement issues.	Perry, Patrick A.	0.5	312.75	69,081.75	WO HD	TR
02/25/16	6788957	Confer with prospective Mentone buyer and P. Perry re outstanding Menton investigation and administration issues (0.3); confer with G. Jaramillo re status of transfer of Mentone escrow (0.2); confer with Receiver and counsel re estate administration matters (0.4); review documents re estate asset valuations and confer with counsel re same (1.0); review and respond to correspondence re deposits into Yanrob accounts (0.3).	Del Castillo, Joshua A.	2.2	1,089.00	70,170.75	WO HD	TR
02/25/16	6794537	Additional review re: Celtic Bank and calls and emails with accounting firm (0.4).	Harbison, Kenyon	0.4	178.20	70,348.95	WO HD	TR
02/26/16	6790394	Attention to numerous outstanding asset administration issues (1.3); review and revise draft detailed turnover demand to Celtic Bank (1.5).	Del Castillo, Joshua A.	2.8	1,386.00	71,734.95	WO HD	TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
02/29/16	6793923	Review documents re asset valuations and confer with Receiver's team re same (0.9); prepare update and inquiry to M. Hiraide (0.2).	Del Castillo, Joshua A.	1.1	544.50	72,279.45	WO HD TR
03/01/16	6795951	Review/evaluate the appeal to recovery/deposition of real property assets, including conference with counsel (.4). Further call related to medical offices and approach to Mentone Project (.3).	Zaro, David R.	0.7	469.35	72,748.80	WO HD TR
03/01/16	6795937	Telephone conversation with City Planner regarding entitlement review process.	Perry, Patrick A.	0.3	187.65	72,936.45	WO HD TR
03/01/16	6795491	E-mails and teleconferences re asset administration, disposition, and recovery efforts and status with Receiver, counsel, and E. Dean (counsel for Celtic Bank) (2.0); review documents re same (1.1).	Del Castillo, Joshua A.	3.1	1,534.50	74,470.95	WO HD TR
03/02/16	6796500	Review and revise letter to Celtic Bank relating to recovery of money obtained by Celtic Bank from receivership and related entities.	Harbison, Kenyon	0.5	222.75	74,693.70	WO HD TR
03/03/16	6797116	Review and respond to correspondence from M. Hiraide re asset administration and disposition matters, and confer with K. Harbison re same (1.0)	Del Castillo, Joshua A.	1.0	495.00	75,188.70	WO HD TR
03/03/16	6824993	Additional analysis and follow up communications relating to the Mentone property (0.5); drafted/finalized meet and confer turnover demand letter to Celtic Bank and related communications and	Harbison, Kenyon	1.5	668.25	75,856.95	WO HD TR

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Trans Date	Index	Description of Service Rendered analysis of documents (1.0).	Timekeeper	Hours	Fees	Sum	Circle Action
03/04/16	6798217	Review and respond to correspondence from S. Donell re asset administration issues and prepare updates re same (0.5); review correspondence from E. Dean re Celtic Bank asset administration requests, discuss with Receiver, and prepare updates to all parties (0.8).	Del Castillo, Joshua A.	1.3	643.50	76,500.45	WO HD TR
03/05/16	6799439	Review and respond to correspondence re asset administration matters (1.5).	Del Castillo, Joshua A.	1.5	742.50	77,242.95	WO HD TR
03/07/16	6800660	Confer with counsel, legal advise related to Mentone project and next steps (.3).	Zaro, David R.	0.3	201.15	77,444.10	WO HD TR
03/07/16	6836329	Communications and email with D. Zaro re: Mentone (0.3).	Harbison, Kenyon	0.3	133.65	77,577.75	WO HD TR
03/08/16	6803792	Address the land use and issues concerning the Mentone asset/annexation by Redlands and call with counsel re same (.3).	Zaro, David R.	0.3	201.15	77,778.90	WO HD TR
03/08/16	6800574	Review correspondence from Park Place Escrow and prepare response enclosing Receiver's escrow transfer demand for Mentone property and associated matters (0.5); teleconference with M. Richardson re construction bond for Fontana project and confer with Receiver and counsel re same (0.4); review and respond to correspondence from E. Dean re turnover demand and confer with Receiver and counsel re same (0.5); review correspondence from Park Place Escrow re Mentone property	Del Castillo, Joshua A.	1.7	841.50	78,620.40	WO HD TR

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Trans Date	Index	Description of Service Rendered and confer re same (0.3).	Timekeeper	Hours	Fees	Sum	Circle Action
03/08/16	6803294	Call and coordination regarding Mentone annexation issues (0.2).	Harbison, Kenyon	0.2	89.10	78,709.50	WO HD TR
03/09/16	6803817	Analysis of Mentone project purchase/sale contracts, amendments, assess the approach to buyer/project following conferences as to project timing/prospects (1.2). Emails related to the project issues with counsel to address approach in light of contract status (.3).	Zaro, David R.	1.5	1,005.75	79,715.25	WO HD TR
03/09/16	6802669	E-mails and teleconferences with Receiver, brokers, and counsel re asset administration and valuation issues (2.6).	Del Castillo, Joshua A.	2.6	1,287.00	81,002.25	WO HD TR
03/09/16	6803572	Call regarding asset preservation issues relating to Hesperia (0.3); review and respond to D. Zaro relating to Mentone status (0.1); call with S. Donell and J. del Castillo relating to, in relevant part, Hesperia and Fontana property preservation issues and follow up email (0.4); conference and email re: Yanrob's property preservation (0.2).	Harbison, Kenyon	1.0	445.50	81,447.75	WO HD TR
03/09/16	6836398	Portion of Celtic Bank counsel call relating to more general issues not relating to discovery disputes (0.2)	Harbison, Kenyon	0.2	89.10	81,536.85	WO HD TR
03/10/16	6806327	Review legal issues re \$2.0M turnover demand to Celtic and OSC filing (.3). Assess the issues related to Yanrob entity/medical office building, turnover and disposition (.4).	Zaro, David R.	0.7	469.35	82,006.20	WO HD TR
03/10/16	6803985	Confer with Receiver and counsel re	Del Castillo, Joshua	2.4	1,188.00	83,194.20	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper A.	Hours	Fees	Sum	Circle Action
		asset administration matters (1.7); prepare draft letter to E. Dean re follow-up to asset turnover demand (0.5).; review and respond to inquiry re Mentone property (0.2).	Α.				
03/11/16	6806254	Correspondence re administration and alternatives for Yanrob (Vanderbilt) property (0.5).	Del Castillo, Joshua A.	0.5	247.50	83,441.70	WO HD TR
03/14/16	6808747	Review additional issues related to Mentone project land use issues/approach (.3). Call/emails with counsel concerning the strategy/cost-benefit re pursuit of entitlements (.3).	Zaro, David R.	0.6	402.30	83,844.00	WO HD TR
03/14/16	6825295	Email D. Zaro relating to Mentone (0.1); communications relating to Vanderbilt call (0.2); conference with D. Zaro and email to P. Perry relating to next steps on Mentone (0.3); email to S. Donell relating to Mentone (0.1).	Harbison, Kenyon	0.7	311.85	84,155.85	WO HD TR
03/15/16	6825489	Correspondence and call relating to Vanderbilt property, with brokers (0.5).	Harbison, Kenyon	0.5	222.75	84,378.60	WO HD TR
03/16/16	6811325	Review additional documents and information as to Redland's review of the project/confer regarding project prospects and resubmission of the prior package (.4).	Zaro, David R.	0.4	268.20	84,646.80	WO HD TR
03/16/16	6811041	Review requirements for preliminary review application; review notes from previous preliminary review meetings.	Perry, Patrick A.	1.4	875.70	85,522.50	WO HD TR
03/16/16	6809210	Confer with Receiver and counsel re asset administration matters (1.3); prepare follow-up e-mail to counsel to Celtic Bank re Fontana Property and	Del Castillo, Joshua A.	2.3	1,138.50	86,661.00	WO HD TR

## Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 45 of 100 Page ID #:1895 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00003 (Asset Recovery & Administration) 375525-00003

Trans Date	Index	Description of Service Rendered review responses to same (0.5); confer with Receiver and review	Timekeeper	Hours	Fees	Sum	Circle Action
		documents reflecting falsity of Celtic's accusations (0.5).					
03/16/16	6825592	Call with P. Perry relating to Mentone issues and related review of documents and follow-up (0.5); review and respond to receiver relating to payment to broker (0.2)	Harbison, Kenyon	0.7	311.85	86,972.85	WO HD TR
03/17/16	6811372	Telephone conversation with City Planner regarding preliminary review application.	Perry, Patrick A.	0.3	187.65	87,160.50	WO HD TR
03/17/16	6825708	Call with J. Acosta relating to Mentone and review of documents from him , follow up email(1.0)	Harbison, Kenyon	1.0	445.50	87,606.00	WO HD TR
03/18/16	6813280	Telephone conference with Civil Engineer regarding status of Tract Map materials; review documentation for submittal of tract map application.	Perry, Patrick A.	0.7	437.85	88,043.85	WO HD TR
03/18/16	6825734	Call with P. Perry relating to Mentone issues (0.1).	Harbison, Kenyon	0.1	44.55	88,088.40	WO HD TR
03/21/16	6814247	Assess the issues related to Celtic Bank Order to Show Cause arising out of Celtic's refusal to turnover funds (.4). Review emails and response to Celtic Bank re turnover of the deposits and factual basis for OSC (.1).	Zaro, David R.	0.5	335.25	88,423.65	WO HD TR
03/21/16	6812434	Attention to asset administration issues (0.3); analysis of issues, review documents, and prepare drat application for OSC re turnover against Celtic Bank (1.5).	Del Castillo, Joshua A.	1.8	891.00	89,314.65	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
03/22/16	6814168	Revise Celtic Bank ex parte and confer with counsel re same (1.3).	Del Castillo, Joshua A.	1.3	643.50	89,958.15	WO HD TR
03/23/16	6815604	Review/evaluate the findings from the engineer, status of entitlements/emails re Mentone (.4). Calls with counsel, assess memo related to Mentone, advice re same (.3). Review/revise the Celtic Bank OSC brief and follow-up to advise counsel re same (.4). Several emails/calls with counsel concerning Mentone development (.6).	Zaro, David R.	1.7	1,139.85	91,098.00	WO HD TR
03/23/16	6818029	Review project documents and draft budget for completion of application process.	Perry, Patrick A.	1.5	938.25	92,036.25	WO HD TR
03/23/16	6814638	Teleconference with Wieland re costs of security and other asset preservation issues (0.3); complete draft of ex parte application re Celtic Bank and deliver for review and comment (1.5); confer with Receiver and counsel re Mentone property and process (0.5).	Del Castillo, Joshua A.	2.0	990.00	93,026.25	WO HD TR
03/23/16	6825830	Review online re: Pat Meyer (0.3); left word with Pat Meyer (0.1); call with S. Donell (0.2); call P. Perry (0.2); call with Pat Meyer (0.4); email to Pat Meyer and analysis of his proposal (0.1).	Harbison, Kenyon	1.2	534.60	93,560.85	WO HD TR
03/24/16	6815754	Review and revise ex parte application against Celtic Bank (0.6).	Del Castillo, Joshua A.	0.6	297.00	93,857.85	WO HD TR
03/25/16	6817001	Prepare additional materials for ex parte application re Celtic Bank deposits (0.7).; confer with counsel	Del Castillo, Joshua A.	1.0	495.00	94,352.85	WO HD TR

## Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 47 of 100 Page ID #:1897 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00003 (Asset Recovery & Administration) 375525-00003

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		and prepare additional revisions to ex parte application (0.3).					
03/28/16	6821054	Revise estimated budget for development approvals.	Perry, Patrick A.	0.5	312.75	94,665.60	WO HD TR
03/28/16	6818588	Review documents and prepare Donell Declaration for Celtic Bank ex parte (0.9).	Del Castillo, Joshua A.	0.9	445.50	95,111.10	WO HD TR
03/28/16	6822550	Email to receiver about Mentone project and related emails with P. Perry and call with J. del Castillo and receiver.	Harbison, Kenyon	0.4	178.20	95,289.30	WO HD TR
03/29/16	6819817	Review preliminary forensic accounting summary and confer with counsel and Receiver re demands for turn-over of recently identified assets (0.9).	Del Castillo, Joshua A.	0.9	445.50	95,734.80	WO HD TR
03/30/16	6822678	Call re Mentone project, address timing/cost to address the Receiver's alternative approach to development/sale contract (.3).	Zaro, David R.	0.3	201.15	95,935.95	WO HD TR
03/30/16	6821278	Review marketing materials circulated by Lee and Associates (0.2); prepare for and teleconference with Receiver and brokers (1.5); teleconference with T. Donell re Vanderbilt property and prepare inquiry and demand to M. Hiraide re same (0.5); teleconferences with M. Hiraide and C. Jung re same (0.9); prepare update to counsel (0.1); analysis of issues presented by Hiraide proposal (.5).	Del Castillo, Joshua A.	3.7	1,831.50	97,767.45	WO HD TR
03/31/16	6823400	Conference call with counsel and Receiver as to Mentone development	Zaro, David R.	0.6	402.30	98,169.75	WO HD TR

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Trans Date	Index	<b>Description of Service Rendered</b> issues, follow-up as t Lafferty and RL Properties (.6).	Timekeeper	Hours	Fees	Sum	Circle Action
03/31/16	6822685	Complete ex parte application materials and deliver for Receiver's review and comment (0.5); teleconference with Receiver re proposal to sell Vanderbilt property and recovery of GBC funds (0.5).	Del Castillo, Joshua A.	1.0	495.00	98,664.75	WO HD TR
03/31/16	6824195	Communications and review of Mentone documents, call with client about Mentone, and follow up communications and analysis relating to the same.	Harbison, Kenyon	1.3	579.15	99,243.90	WO HD TR

#### Disbursements for Matter 375525-00003 (Asset Recovery & Administration)

Trans Date	Index	Туре	Quantity	Amt Circle Action
03/04/16	2214715	Messenger Federal Express Invoice No: 534769675 1977 Ship To: Eric Dean	1.00	10.85 WO HD TR
03/04/16	2214716	Messenger Federal Express Invoice No: 534769675 1977 Ship To: Leslie Rinaldi	1.00	14.99 WO HD TR
03/07/16	2216566	Service of Process Nationwide - Service of Process CELTIC BANK ^ 142104	1.00	173.25 WO HD TR

#### **Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David R. Zaro	25.4	670.50	17,030.70
001165	Patrick A. Perry	8.0	625.50	5,004.00
001842	Joshua A. Del Castillo	131.6	495.00	65,142.00
001977	Kenyon Harbison	22.0	445.50	9,801.00
002149	Maxwell Shapiro	1.4	333.00	466.20
002191	Melissa K. Zonne	5.3	306.00	1,621.80
002255	Richard Miltimore	0.4	445.50	178.20

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Total Fees Total Disbursements			194.1		99,243.90 99,243.90 199.09
Attorney Billing Instructions				÷	
( ) BILL ALL ( ) BILL FEES ONLY ( ) BILL COST ONLY	(	)	Hold Write Off Transfer All		_
Billing Instructions					1
expires 6/30/2016: 10% automatic discount on rates					

#### Account Summary- As Of 03/31/2016

	. (	Calendar YTD		LTD				
	Total	Fees	Disbursement	Total	Fees	Disbursement		
Worked	107,092.54	106,893.45	199.09	107,092.54	106,893.45	199.09		
Unbilled Adj	(909.00)	(909.00)	0.00	(909.00)	(909.00)	0.00		
Billed	0.00	0.00	0.00	0.00	0.00	0.00		
Collected	0.00	0.00	0.00	0.00	0.00	0.00		
AR Write Off	(909.00)	(909.00)	0.00	0.00	0.00	0.00		
	Total	Fees	Cost					
WIP Balance	137,960.74	137,761.65	199.09					
AR Balance	0.00	0.00	0.00					
Unallocated Payment	0.00							
Client Trust Balance	0.00							
The state of the s	0,00							

#### **Billing Address**

Stephen J. Donell, Receiver - FedReceiver, Inc. FedReceiver Inc 12121 Wilshire Blvd., Suite 301 Los Angeles, CA 90025 ATTN:

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#### Preliminary Billing Form

Billing Atty: 001842 - Joshua Del Castillo

Matter #: 375525-00004

Matter Name: Investigation/Reporting

Date of Last Billing:

Client Name: Stephen J. Donell, Receiver - FedReceiver, Inc.

Proforma Number 1266550 Client/Matter Joint Group # 375525-1

#### Fees for Matter 375525-00004 (Investigation/Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
12/14/15	6731191	Confer with counsel re demand letter and subpoena to Mason Investments (0.2).	Del Castillo, Joshua A.	0.2	99.00	99.00	WO HD TR
12/14/15	6743160	Review additional of Mason Investments' corporate status (0.5), and drafted Mason Investments subpoena and attachment (0.4).	Harbison, Kenyon	0.9	400.95	499.95	WO HD TR
12/15/15	6731236	Correspondence and teleconferences with Receiver, counsel, Defendants' counsel, and third parties re document recovery and turn-over requirements (1.7); prepare for and teleconference with SEC and Defendants' counsel (1.1); prepare access letter to SEC (0.1).	Del Castillo, Joshua A.	2.9	1,435.50	1,935.45	WO HD TR
12/15/15	6743226	Revised subpoena for Mason Investments LLC and drafted and sent service email (0.3); instructions given relating to subpoenas for banks (0.1).	Harbison, Kenyon	0.4	178.20	2,113.65	WO HD TR
12/16/15	6732501	Work on recovery of the receivership documents/records held by third parties and address turnover/subpoenas (.3). Call to advise as to pending litigation/impact	Zaro, David R.	0.7	469.35	2,583.00	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		of Preliminary Injunction stay order and terms (.4).					
12/16/15	6731407	Revise outline for Initial Report and continue draft (0.9).	Del Castillo, Joshua A.	0.9	445.50	3,028.50	WO HD TR
12/16/15	6734278	Review TAB documents on FTP site and attempt download; (.4) correspondence re access to docs on FTP site; (.2)	Zonne, Melissa K.	0.6	183.60	3,212.10	WO HD TR
12/16/15	6770258	Correspondence re subpoenas to various bank entities and escrow companies; analysis re exhibits to subpoenas.	Zonne, Melissa K.	0.9	275.40	3,487.50	WO HD TR
12/17/15	6733132	Review and respond to receiver email relating to records from Rivera accounting firm (0.1); review letter to Donell with Rivera documents and finalize for service (0.3); correspondence re setting up the TAB document pickup (0.3); dealing with TAB FTP issues (0.2).	Harbison, Kenyon	0.9	400.95	3,888.45	WO HD TR
12/17/15	6734279	Phone calls and email correspondence with J. Themm and S. Cawed re SFTP documents; (.3) draft letter from K. Harbison to S. Donell re flash drive with Suncor accountant; (.2) review flash drive of Rivera documents; (.3) phone call with A. Solano re documents from J. Themm at TAB; (.2) further correspondence with J. Themm re hard copy original documents; (.2) research various entities to subpoena; draft subpoenas for several banks and escrow companies; draft exhibits to	Zonne, Melissa K.	4.8	1,468.80	5,357.25	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		subpoenas for all 8 entities/individuals requesting various documents; draft TEIN chart; Revise subpoenas with TEIN numbers; correspondence and research re additional entity name associated with receivership; email correspondence with J. Themm and S. Cawed re failed document download;					
12/18/15	6735899	Review issues related to document imaging, turnover, address next steps/timing, scope of subpoena (.4). Calls with Receiver/counsel re document turnover as to counsel for defendant (.3).	Zaro, David R.	0.7	469.35	5,826.60	WO HD TR
12/18/15	6735131	Review and respond to correspondence from Receiver and counsel re status of document turnover and review efforts (1.1).	Del Castillo, Joshua A.	1.1	544.50	6,371.10	WO HD TR
12/18/15	6735133	Revise draft sections of Initial Report and confer re same (1.0).	Del Castillo, Joshua A.	1.0	495.00	6,866.10	WO HD TR
12/18/15	6734443	Dealing with DTI/TAB production issues (0.4); left word on Jeff Themm cell phone (0.1); call to Jeff Themm (0.2); deal with Citizen's Bank subpoena issue (0.3); email to Jeff Themm about document issues (0.1); follow up coordination with M. Zonne re document issues (0.2).	Harbison, Kenyon	1.3	579.15	7,445.25	WO HD TR
12/18/15	6737838	Revise entity information bank/escrow subpoenas; (.5) follow up re FTB documents failed and confer re uploading documents for review; (1.4) confer re status of document productions; (.4) review hard copy	Zonne, Melissa K.	3.5	1,071.00	8,516.25	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		documents received from TAB/DTI and draft outline of findings; (.4) research banks to subpoena and bank account records for each; (.3) draft additional subpoena and exhibit for additional bank entity; (.2) draft and revise letter for Donell for additional files and facilitate Fedex of documents to receiver (.3)					
12/21/15	6735145	E-mails and teleconferences with Receiver and counsel re document recovery and investigation efforts (1.1).; prepare request to M. Hiraide (0.1).; continue review of documents and preparation of Initial Report and circulate materials for review and comment (3.2).	Del Castillo, Joshua A.	4.4	2,178.00	10,694.25	WO HD TR
12/22/15	6737189	Review and evaluate the Celtic Bank loan issues/assess the right/duties of parties and follow-up on loan documents (.7); Address the issues related to document turnover from defendants subpoenas, motion to compel, follow-up (.4); Emails related to construction issues as to finance and follow-up (.6).	Zaro, David R.	1.7	1,139.85	11,834.10	WO HD TR
12/22/15	6736694	Review documents and updates from Receiver and finalize draft of Initial Report for client review and comment (4.0).	Del Castillo, Joshua A.	4.0	1,980.00	13,814.10	WO HD TR
12/22/15	6743593	Drafted turnover letter to M. Hiraide (0.4).	Harbison, Kenyon	0.4	178.20	13,992.30	WO HD TR
12/23/15	6737568	Prepare exhibits for Initial report and finalize Initial Report for filing (2.5).	Del Castillo, Joshua A.	2.5	1,237.50	15,229.80	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
12/23/15	6743645	Additional review of Celtic Bank production and gathering documents for D. Zaro (0.6); email to G. Lopez (0.1); finalized and sent turnover letter to J. Penman (0.3); revised turnover letter to Hiraide (0.3).	Harbison, Kenyon	1.3	579.15	15,808.95	WO HD TR
12/28/15	6738690	Review and revise turnover letter to M. Hiraide and confer with counsel re same (0.5).	Del Castillo, Joshua A.	0.5	247.50	16,056.45	WO HD TR
12/28/15	6743742	Follow up relating to Hiraide turnover letter (0.1); revised seven subpoenas and exhibits (2.0); handling of issue of Bank of America Yanrob's Medical, Inc. account, including email correspondence and call to bank (0.4); call to R. Tidd of Pacific Premier bank and follow up email (0.2); call with J. del Castillo relating to GBC issue (0.1); finalized and sent Hiraide turnover letter (0.2); follow up email to counsel for Mason Investments relating to subpoena (0.1).	Harbison, Kenyon	2.5	1,113.75	17,170.20	WO HD TR
12/29/15	6739651	Review materials and prepare inquiries to M. Hiraide and SEC re document production matters (0.5); confer with counsel re Mason Investment's refusal to produce in response to subpoena and prepare inquiry to SEC re same (0.3); teleconference with M. Hiraide (0.5).	Del Castillo, Joshua A.	1.3	643.50	17,813.70	WO HD TR
12/29/15	6743826	Emails and correspondence relating to access to Pacific Premier bank account (0.4); finalized and prepared bank and escrow subpoenas for filing tomorrow (0.4).	Harbison, Kenyon	0.8	356.40	18,170.10	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action	
12/30/15	6743914	Review and respond to emails relating to online access for Pacific Premier account (0.5); finalized and served seven new subpoenas (0.2).	Harbison, Kenyon	0.7	311.85	18,481.95	WO HD TR_	
12/31/15	6743566	Review/evaluate the Celtic loan documents, communications as to Fontana project (.8).	Zaro, David R.	0.8	536.40	19,018.35	WO HD TR_	
12/31/15	6743439	Record additional subpoenas in log and update	Zonne, Melissa K.	0.2	61.20	19,079.55	WO HD TR_	
01/04/16	6744753	Communications relating to subpoenas status and related issues concerning discovery needed (0.2); coordination re: the Orange Community Escrow documents and Mason Investments subpoena (0.3).	Harbison, Kenyon	0.5	222.75	19,302.30	WO HD TR_	
01/04/16	6744732	Update subpoena tracking sheet; (.1) create demand letter tracking sheet and review outgoing demand letters; (.2) download and review documents received from Donell re: Suncor Hesperia escrow; (.5) draft outline re: the same and create file for documents received; (.3) draft letter to Donell re: SEC production and facilitate FedEx of production to Donell; (.2) email correspondence re: deadlines for demand letters and subpoena productions; (.3) update tracking sheets with service dates; (.2)	Zonne, Melissa K.	1.8	550.80	19,853.10	WO HD TR_	
01/05/16	6745454	Prepare revised discovery and document demands to Park Place Escrow and confer with Receiver's team re same (0.5); review deposition testimony of Defendants Kano and	Del Castillo, Joshua A.	2.3	1,138.50	20,991.60	WO HD TR_	

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		Yang and prepare notes for Receiver re same (1.7).					
01/05/16	6746325	Emails relating to City National Bank subpoena and coordination relating to SEC production with M. Zonne (0.3); review and analysis of C. Kano transcript relating to the T. Sabo situation and email to J. del Castillo (0.4).	Harbison, Kenyon	0.7	311.85	21,303.45	WO HD TR
01/05/16	6746098	Draft subpoena to City National Bank; (.1) draft exhibit A with correct account numbers; (.1) research CNB entity to determine best service address and merger; (.3) phone call with CNB personnel re: the same; (.2) review additional production received from Receiver for narrative; (1.0) review and file docs received from SEC; (.2) create and draft production narrative outlining all production received; (.6) confer and conduct analysis re: financial status and outstanding monies and docs produced; (.6) follow up re: miscellaneous cases; (.1)	Zonne, Melissa K.	3.2	979.20	22,282.65	WO HD TR
01/06/16	6748339	Review and analysis re: Fibonacci subpoena service and locations/address, including calls, and finalized and served the City National Bank subpoena (0.4); call with counsel for Pacific Premier bank relating to subpoena service and extension (0.1).	Harbison, Kenyon	0.5	222.75	22,505.40	WO HD TR
01/06/16	6750860	Research B. Marshall-Jones to locate hard address for subpoena; (.6) determine cost to serve subpoena in	Zonne, Melissa K.	1.9	581.40	23,086.80	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Süm	Circle Action
		Nantucket; (.1) prepare and revise subpoena to Marshall-Jones; (.1) confer re: Marshall-Jones subpoena; (.2) revise subpoena to CNB and serve; (.2) download SEC production from online cloud; (.3) review correspondence re: the same; (.1) correspondence and draft notes re: miscellaneous case numbers; (.2) review correspondence re: translation services; (.1)					
01/07/16	6748054	Confer with Receiver staff, counsel, and SEC re status of pending document requests (0.5); confer with counsel re required additional discovery (0.5); review documents and prepare update and inquiry to M. Hiraide re outstanding document request (0.2); teleconferences with M. Hiraide and SEC re discovery and asset identification issues (1.0).	Del Castillo, Joshua A.	2.2	1,089.00	24,175.80	WO HD TR
01/07/16	6767249	Review and correspondence re: demand letters, multiple (0.2).	Harbison, Kenyon	0.2	89.10	24,264.90	WO HD TR
01/07/16	6750927	Correspondence re: TAB documents; (.1)	Zonne, Melissa K.	0.1	30.60	24,295.50	WO HD TR
01/08/16	6767303	Review re: B. Marshall-Jones and email re: same (0.1).	Harbison, Kenyon	0.1	44.55	24,340.05	WO HD TR
01/08/16	6750990	Correspondence re: Marshall-Jones subpoena; review correspondence re: deadline for Q4 filing of quarterly reports and fee applications	Zonne, Melissa K.	0.2	61.20	24,401.25	WO HD TR
01/09/16	6749637	Review documents and prepare discovery summary (0.8).	Del Castillo, Joshua A	0.8	396.00	24,797.25	WO HD TR
01/11/16	6767562	Review re: subpoena status (0.1);	Harbison, Kenyon	0.3	133.65	24,930.90	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		dealt with Lee & Keary production (0.2).					
01/11/16	6751013	Update files and logs for subpoenas and demand letters, extensions, etc.; (.8) correspondence re: the same and provide confirmation of various entities subpoenaed; (.2) upload documents from Orange Community and file; (.2) draft letter to S. Donell re: production from Orange Community, copy production and send; (.2)	Zonne, Melissa K.	1.4	428.40	25,359.30	WO HD TR
01/12/16	6767707	Review re: Park Place production and email M. Zonne (0.1); call with N. Janumyan of CNB and email M. Zonne (0.2); email to S. Bates about subpoena spreadsheet (0.1); review and email about subpoena to Bank of the West (0.2); email to M. Zonne about research relating to Mason production issue (0.1).	Harbison, Kenyon	0.7	311.85	25,671.15	WO HD TR
01/13/16	6767877	Email to M. Zonne about preliminary reports on the properties (0.1); follow up about East West documents and basic review (0.1); follow up with M. Zonne about additional download of SEC documents (0.1); finalize and email case spreadsheet to S. Bates (0.3).	Harbison, Kenyon	0.6	267.30	25,938.45	WO HD TR
01/14/16	6756526	Conduct analysis of received documents and outstanding entities; AA(.7) update letter to S. Bates and facilitate CD conversion of all files to send to Receiver's office; (.2) upload docs received'd from Park Place; (.1) review and summarize Park Place	Zonne, Melissa K.	3.6	1,101.60	27,040.05	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		documents; (.8) file and log proofs of service of subpoenas; (.1) research re: Mason's basis for refusing production; (.8) Draft findings and case law with analysis; (.3) review preliminary title reports of all 3 properties; (.4) draft outline of findings and key issues re: the same; (.3) correspondence re: new Accellion uploads; (.2) citizens Business Bank invoice (.1) review issues re: Eastern District miscellaneous case and confer re: resolution (.3)					
01/19/16	6755461	Confer with counsel re documents produced in response to subpoenas and outstanding discovery issues (1.3); review additional subpoenas (0.2); confer with counsel, Receiver, and SEC re Mason Investments refusal to produce (0.6).	Del Castillo, Joshua A.	2.1	1,039.50	28,079.55	WO HD TR
01/19/16	6768373	Correspondence re: document productions with receiver (0.3); review and correspondence re: Mason production issue (0.3); dealt with CNB invoicing issue as to its production (0.1); follow up re: Park Place productions and CNB/SEC production (0.2); dealing with Relativity/document review issues (0.2).	Harbison, Kenyon	1.1	490.05	28,569.60	WO HD TR
01/19/16	6761650	Confer re: doc production issues; (.3) update log with new proofs of service; (.1) upload and copy Hiraide production; (.2) review Hiraide document production in detail and draft outline as part of narrative; (1.1)	Zonne, Melissa K.	4.1	1,254.60	29,824.20	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		review correspondence and draft letter to Jeff Brandlin re: document copies; (.2); confer re: CNB production issues, retainer, and pay invoice; (.3) update demand letter log; (.1) upload and log Park Place documents (.2) review Mason documents and draft outline; (.9) prepare documents to send to receiver and J. Brandlin; (.2) correspondence re: Mason / SEC documents; (.2) meet and conduct analysis re: central issues and deadlines, (.5); correspondence with First American re: mentone property APN issues; (.3).					
01/20/16	6756789	Review documents produced by CNB in connection with account undisclosed by defendants and dissipation of same (0.5); confer with counsel re same (0.2).	Del Castillo, Joshua A.	0.7	346.50	30,170.70	WO HD TR
01/20/16	6757090	Teleconference with M. Hiraide re undisclosed CNB account (0.2).	Del Castillo, Joshua A.	0.2	99.00	30,269.70	WO HD TR
01/20/16	6768456	Correspondence with receiver relating to status of productions (0.2).	Harbison, Kenyon	0.2	89.10	30,358.80	WO HD TR
01/20/16	6761731	Review correspondence re: CNB turnover refusal (.2) confer and conduct analysis re: Mentone APN issues; (.8) load, review and finalize CNB production to send; (.6) conduct analysis and facilitate recording issues with San Bernardino County re: notices of pendency (.9) several phone calls with county recorder re: the same; (.6) confer re: modifications re: lis pendens; (.2) revise as lis	Zonne, Melissa K.	4.2	1,285.20	31,644.00	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		pendens (.5) update log with subpoena responses; draft cover letter re: the same (.1) further correspondence re: Mason documents and document type (.2)					
01/21/16	6758082	Review correspondence and documents in connection with Receiver's investigation efforts and confer with Receiver and counsel re same (2.5).	Del Castillo, Joshua A.	2.5	1,237.50	32,881.50	WO HD TR
01/21/16	6802871	Confirm and brief review of Park place documents; (.1) continue to confer with First American re: Mentone issues; (.2) review Pan Pacific law firm documents produced; (.4) confer re: Pan Pacific demand; (.1)	Zonne, Melissa K.	0.8	244.80	33,126.30	WO HD TR
01/22/16	6759407	Teleconference with SEC re hearing on Initial Report (0.2); review docket (0.1); teleconference with Court clerk re continued hearing on Initial Report and provide notice to parties re same (0.4); confer with counsel and deliver accounting files to SEC and Defendants' counsel (0.2).	Del Castillo, Joshua A.	0.9	445.50	33,571.80	WO HD TR
01/22/16	6768743	Received Pacific Premier production and brief collection and correspondence re: the same (0.1); call with Bank of the West about document production issues and follow up emails re: the same (0.5); correspondence with receiver about status of subpoenas and productions (0.3).	Harbison, Kenyon	0.9	400.95	33,972.75	WO HD TR
01/23/16	6760730	Review and respond to	Del Castillo, Joshua	0.6	297.00	34,269.75	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		correspondence re discovery and document production to SEC (0.3); confer with counsel re status of outstanding subpoenas (0.3).	A.				
01/23/16	6761811	Correspondence re: outgoing productions re: Hiraide and CNB	Zonne, Melissa K.	0.2	61.20	34,330.95	WO HD TR
01/25/16	6763626	Assess the materials from the SEC as to the Mason Investments matter, evaluate potential additional discovery/strategy and advice to counsel as to legal strategy (.6).	Zaro, David R.	0.6	402.30	34,733.25	WO HD TR
01/25/16	6761838	Review documents and confer with counsel and receiver re status of discovery and analysis efforts (1.7).	Del Castillo, Joshua A.	1.7	841.50	35,574.75	WO HD TR
01/25/16	6768894	Correspondence with S. Bates relating to concerns Bank of the West has about subpoena (0.3); two emails to B. Merrell of Bank of the West (0.1).	Harbison, Kenyon	0.4	178.20	35,752.95	WO HD TR
01/25/16	6767471	Prepare new set of produced documents for receiver; (.2) follow up on receipt of pacific premier documents; (.1) review Park place documents for TIN and confer re: the same; (.3) revise log of TINs to add new TIN and social security numbers; (.2) correspondence re: bank of the west re: the same (.2)	Zonne, Melissa K.	1.0	306.00	36,058.95	WO HD TR
01/26/16	6762142	Confer with counsel re status of subpoenas and document review and analysis (0.5).	Del Castillo, Joshua A.	0.5	247.50	36,306.45	WO HD TR
01/26/16	6768971	Review and revise two demand letters (0.4).	Harbison, Kenyon	0.4	178.20	36,484.65	WO HD TR

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Trans Date	index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
01/26/16	6767555	Correspondence re: CNB and Hiraide documents; (.2) correspondence re: document management; (.3) compile notes re: park place and conduct analysis; (.3) draft, revise and send demand letters for park place and CBB; (.4) locate and confirm service of CBB subpoena; (.1) review correspondence re: Park v Yang and partial stay language; (.1) draft notice for Park v. Yang re: the same; (.4).	Zonne, Melissa K.	1.8	550.80	37,035.45	WO HD TR
01/27/16	6763806	Confer with counsel re Mason Investments production to SEC and review of same (0.5); review documents (0.2).	Del Castillo, Joshua A.	0.7	346.50	37,381.95	WO HD TR
01/28/16	6764308	Review correspondence from and documents produced by Park Place Escrow (0.7); confer with counsel re same (0.2).	Del Castillo, Joshua A.	0.9	445.50	37,827.45	WO HD TR
01/28/16	6769051	Multiple emails and correspondence dealing with outstanding discovery issues (0.3).	Harbison, Kenyon	0.3	133.65	37,961.10	WO HD TR
01/28/16	6804696	Phone calls with CBB re: subpoena production; (.2).	Zonne, Melissa K.	0.2	61.20	38,022.30	WO HD TR
01/29/16	6768110	Confer with counsel re status of discovery and document productions (0.5); review correspondence from J. Kopelev re potential document production in furtherance of Receiver's investigation effort and confer with counsel re same (0.3).	Del Castillo, Joshua A.	0.8	396.00	38,418.30	WO HD TR
01/29/16	6767886	Review Nancye Woodward – park place escrow emails; (.2) Review new park place escrow documents; (.3)	Zonne, Melissa K.	1.5	459.00	38,877.30	WO HD TR

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Trans Date	Index	Description of Service Rendered correspondence with S. Bates re: park place; (.1) draft and send update of all subpoena responses and send log to S. Bates; (.3) update production narrative and send outline and analysis of findings; (.4) correspondence re: park place and meet and confer letter; (.2)	Timekeeper	Hours	Fees	Sum	Circle Action
02/01/16	6769196	Confer with counsel re FOIA protection request made in J. Kopel letter (0.3); analysis of source of Celtic Bank funds and review documents and confer with Receiver re same (0.5).	Del Castillo, Joshua A.	0.8	396.00	39,273.30	WO HD TR
02/01/16	6770604	Coordination re: demand letters to additional firms (0.1); review GBC subpoena and correspondence re: the same (0.2); call with B. Merrell and confirming email re: discovery extension (0.2).	Harbison, Kenyon	0.5	222.75	39,496.05	WO HD TR
02/01/16	6804705	Review FOIA letter and analyze legal issues; (.1) research FOIA's relevancy to non-government agency; (.4) outline findings; (.2) draft four demand letters to law firms; (.6) draft subpoena and exhibit to GBC International Bank (.3) update form with new TIN and SS numbers; (.2) confer re: the same (.1); Correspondence and conduct analysis re: subpoena/FOIA issue/other discovery issues; (.8); review correspondence from Bank of the West re: subpoena and extension; (.2) update subpoena log (.1)	Zonne, Melissa K.	3.0	918.00	40,414.05	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
02/02/16	6770064	Teleconference with J. Kopel re anticipated production of documents and confidentiality request re same (0.2).	Del Castillo, Joshua A.	0.2	99.00	40,513.05	WO HD TR
02/02/16	6770789	Review and emails re: supplemental CNB production (0.1); call with J. del Castillo and emails/review re: Mason production (0.2).	Harbison, Kenyon	0.3	133.65	40,646.70	WO HD TR
02/02/16	6772032	Correspondence with S. Bates re: CNB documents and receiver's receipt of document productions; (.2) review CNB documents; (.9) copy and file re: the same (.2) draft cover letters and send to S. Bates re: the same; (.3) add summary to production narrative; (.4)	Zonne, Melissa K.	2.0	612.00	41,258.70	WO HD TR
02/05/16	6773782	E-mails and teleconference with S. Bates re production of documents requested by SEC (0.2); confer with counsel re status of document recovery efforts (0.5); review documents in connection with Celtic Bank tracing matters (0.8).	Del Castillo, Joshua A.	1.5	742.50	42,001.20	WO HD TR
02/08/16	6775628	Confer with counsel re status of discovery and document turn over efforts (0.7); prepare update for Receiver re same (0.2); review tagged documents in connection with recovery and reporting effort and confer re same (0.9)	Del Castillo, Joshua A.	1.8	891.00	42,892.20	WO HD TR
02/08/16	6776336	Dealing with clean-up investigation issues, including following up on subpoenas, call with S. Bates, communications with M. Zonne (0.9); finalized and served GBC subpoena	Harbison, Kenyon	1.8	801.90	43,694.10	WO HD TR

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Trans Date	Index	Description of Service Rendered and related communications (0.2);	Timekeeper	Hours	Fees	Sum	Circle Action
		email re: Park Place production issues (0.1); finalized and served four demand letters to other law firms mentioned in Kano declaration (0.4).					
02/08/16	6804756	Review Mason/SEC productions already in database and revise production narrative and confer re: the same; (.6) review subpoena for Mason to create outline for review, 4 key categories, and determine what is needed; (.3) correspondence re: SEC documents sent to receiver and Brandlin; (.1) review subpoena log and draft outline of outstanding bank subpoena issues and confer re: various issues; (.5) draft Park place meet and confer letter; (.3) confer re: CNB production (.2) correspondence and follow up re: citizens business bank; (.1)	Zonne, Melissa K.	2.1	642.60	44,336.70	WO HD TR
02/09/16	6776659	Confer with counsel and Receiver's office re new documents produced and status of forensic accounting (0.5).	Del Castillo, Joshua A.	0.5	247.50	44,584.20	WO HD TR
02/09/16	6793313	Email re: Citizens Business Bank and dealing with Bank of the West documents, multiple emails (0.4); Follow up re: Mason issues and Park Place production issues (0.1); review re: Bruce Jones subpoena issues (0.1).	Harbison, Kenyon	0.6	267.30	44,851.50	WO HD TR
02/09/16	6779233	Revise Park place letter; (.5) review email correspondence and document log re: the same; (.3) call citizens business bank re: subpoena and	Zonne, Melissa K.	2.1	642.60	45,494.10	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		invoice; (.3) correspondence re: status of subpoenas; (.2) copy, CDs, update logs, file, log to narrative and send Bank of the West production; (.6) correspondence re: BOTW invoice; (.1) draft cover letters to Bates, Brandlin re: BOTW (.1)					
02/10/16	6779257	Correspondence with S. Bates re: BOTW password; (.1) begin review of Mason documents; (1.2) correspondence and analysis re: Mason documents and key terms; (.3) log demand letters in log; (.1) call with J. Brandlin's office re: BOTW docs (.1) review BOTW documents and update narrative and all logs re: subpoena responses (.4)	Zonne, Melissa K.	2.2	673.20	46,167.30	WO HD TR
02/12/16	6793483	Follow ups relating to Citizens Business Bank production (0.2).	Harbison, Kenyon	0.2	89.10	46,256.40	WO HD TR
02/12/16	6785781	Continue Mason review and confer re: terms; (.4) follow up with Citizens Business Bank personnel re: subpoena/demand letter; (.4) correspondence re: CNB (.2)	Zonne, Melissa K.	1.0	306.00	46,562.40	WO HD TR
02/16/16	6781605	Review and respond to correspondence re forensic accounting issues and discuss with counsel re same (1.1).	Del Castillo, Joshua A.	1.1	544.50	47,106.90	WO HD TR
02/16/16	6785821	Contact various Citizens Business Bank personnel; (.9) confer with Paul at CBB re: new production sent; (.3) confer and conduct analysis re: outstanding issues, Mason document review, etc.; (1.4)	Zonne, Melissa K.	2.6	795.60	47,902.50	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
02/17/16	6782857	Teleconferences with S. Bates and R. Lieu re forensic accounting and reporting issues (0.6); confer with counsel re Mason Investments document review and analysis (0.4).	Del Castillo, Joshua A.	1.0	495.00	48,397.50	WO HD TR
02/17/16	6786927	Copy, review, log and send Citizens business bank production; (.9); continue Mason review; (1.5); create search term list; (.2) confer with J. del Castillo re: search term list; (.1) draft cover letters re: CBB (.1)	Zonne, Melissa K.	2.8	856.80	49,254.30	WO HD TR
02/18/16	6783592	Confer with counsel re forensic accounting and reporting issues (0.5).	Del Castillo, Joshua A.	0.5	247.50	49,501.80	WO HD TR
02/18/16	6788202	Copy and facilitate M. Cates documents to receiver; (.6) draft cover letter re: the same; (.1) review correspondence re: CBB (.1)	Zonne, Melissa K.	0.8	244.80	49,746.60	WO HD TR
02/19/16	6794137	Additional review re: Yanrob's receipts and payments and related correspondence (0.3).	Harbison, Kenyon	0.3	133.65	49,880.25	WO HD TR
02/19/16	6790158	Correspondence and follow up re: productions sent to receiver; (.2) review GBC correspondence and logs (.1) confer re: CBB subpoena follow up (.1)	Zonne, Melissa K.	0.4	122.40	50,002.65	WO HD TR
02/20/16	6790174	Continue Mason document review	Zonne, Melissa K.	0.2	61.20	50,063.85	WO HD TR
02/22/16	6786340	Confer with counsel and Receiver's office re outstanding discovery and forensic accounting matters (0.7).	Del Castillo, Joshua A.	0.7	346.50	50,410.35	WO HD TR
02/22/16	6787258	Review re: Yanrob's document queries and Mason documents review.	Harbison, Kenyon	0.4	178.20	50,588.55	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
02/22/16	6794212	Review and reply to attorney Aykan about discovery extension (0.1); follow up on Mason review (0.1).	Harbison, Kenyon	0.2	89.10	50,677.65	WO HD TR
02/22/16	6790183	Review hard copy docs received from Citizens Business Bank and file; (.4) review and respond to email correspondence with S. Bates; (.2) run search terms through Mason document database, create tags and continue review; (4.2) draft summary of search results, terms and numbers; (.5)	Zonne, Melissa K.	5.3	1,621.80	52,299.45	WO HD TR
02/23/16	6787198	Review documents in connection with status of discovery and forensic accounting efforts (0.8); confer with counsel and Receiver re reporting and forensic accounting expectations and timelines (1.9).	Del Castillo, Joshua A.	2.7	1,336.50	53,635.95	WO HD TR
02/23/16	6794272	Review and provide analysis re: Mason documents strategy (0.1); review and respond re: GBC extension request and other review of investigative emails (0.3).	Harbison, Kenyon	0.4	178.20	53,814.15	WO HD TR
02/23/16	6790275	Continue Mason production review; (.9)	Zonne, Melissa K.	0.9	275.40	54,089.55	WO HD TR
02/24/16	6788069	Review correspondence and confer with counsel re Mason document review, forensic accounting, and status of specific asset investigation issues (2.0).	Del Castillo, Joshua A.	2.0	990.00	55,079.55	WO HD TR
02/24/16	6794407	Draft email relating to forensic accounting instructions (0.2); conference with J. del Castillo relating to investigation and general	Harbison, Kenyon	0.6	267.30	55,346.85	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		administration (0.2); follow up relating to providing documents to accountant and email to J. del Castillo re: expenditures re: Yanrob's (0.2)					
02/24/16	6790556	Correspondence re: forensic accounting; (.2) review subpoena and draft analysis of Mason production; (.7) confer and conduct analysis re: mason production issues and next actions for efficient review; (.4) continue review with various terms (.9)```	Zonne, Melissa K.	2.2	673.20	56,020.05	WO HD TR
02/25/16	6789794	Confer with counsel re status of document review and analysis and related matters (0.6).	Del Castillo, Joshua A.	0.6	297.00	56,317.05	WO HD TR
02/25/16	6794540	Follow up re: Mason document issues (0.1).	Harbison, Kenyon	0.1	44.55	56,361.60	WO HD TR
02/25/16	6790672	Continue review of Mason for summary; (1.6) conduct specific search of Hiraide documents; (.3) compile summary of Hiraide content; (.6) locate and compile all entity documents from Mason documents for binders, business plans, escrow agreements, etc. (1.8)	Zonne, Melissa K.	4.3	1,315.80	57,677.40	WO HD TR
02/26/16	6790060	Confer with counsel and Receiver re various outstanding discovery and forensic accounting issues (1.5).	Del Castillo, Joshua A.	1.5	742.50	58,419.90	WO HD TR
02/26/16	6806366	Finalize Mason review and draft comprehensive summary and analysis of contents (1.1)	Zonne, Melissa K.	1.1	336.60	58,756.50	WO HD TR
02/29/16	6793839	Review offering documents in connection with investigation of use of investor funds (1.1); confer with	Del Castillo, Joshua A.	1.3	643.50	59,400.00	WO HD TR

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Trans Date	Index	Description of Service Rendered counsel re same (0.2).	Timekeeper	Hours	Fees	Sum	Circle Action
03/01/16	6795476	Confer with counsel and Receiver's team re discovery and forensic accounting issues (1.1).	Del Castillo, Joshua A.	1.1	544.50	59,944.50	WO HD TR
03/01/16	6819531	Read and review correspondence re: Aykan law, confirm entity was served (.1); correspondence re: Mason document production; (.1)	Zonne, Melissa K.	0.2	61.20	60,005.70	WO HD TR
03/02/16	6796997	Review accounting results and assess next steps as to defendant and third parties based on transfers (.4)	Zaro, David R.	0.4	268.20	60,273.90	WO HD TR
03/02/16	6796430	Prepare for and attend meeting with Receiver and forensic accountant (2.8).	Del Castillo, Joshua A.	2.8	1,386.00	61,659.90	WO HD TR
03/02/16	6796496	Attendance at meeting with receiver and later with receiver and forensic accountant at meeting relating to forensic accounting.	Harbison, Kenyon	2.8	1,247.40	62,907.30	WO HD TR
03/03/16	6797785	Confer with counsel and SEC re production of documents (0.9).	Del Castillo, Joshua A.	0.9	445.50	63,352.80	WO HD TR
03/03/16	6824996	Follow up emails with GBC relating to document production status (0.2); follow ups and communications relating to Mason documents (0.4); correspondence and call with T. Donell relating to document recovery from Yanrob's offices, and email discovery (0.5); review and analysis of GBC production and sent meetand-confer email to C. Jung (0.5).	Harbison, Kenyon	1.6	712.80	64,065.60	WO HD TR
03/04/16	6798214	Review and respond to correspondence re status of	Del Castillo, Joshua A.	0.3	148.50	64,214.10	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		discovery efforts and outstanding issues re same (0.3).					
03/06/16	6799440	Review and respond to correspondence re outstanding discovery and reporting matters (1.5).	Del Castillo, Joshua A.	1.5	742.50	64,956.60	WO HD TR
03/07/16	6799463	E-mails with Receiver and K. Harbison re status of discovery efforts and outstanding subpoenas (0.5);	Del Castillo, Joshua A.	0.5	247.50	65,204.10	WO HD TR
03/07/16	6803096	Call to R. Lieu relating to starting points for subpoenas update, left word (0.1); additional follow up emails relating to discovery (0.1); drafting of Celtic Bank subpoena and exhibit and email to E. Dean, review correspondence and finalized and serve subpoena (0.6); follow up re: Mason selected production, multiple correspondence (0.4); email SEC re: GBC subpoena (0.1); additional review and correspondence re: bank updates, throughout the day (1.0); review and respond to E. Dean meet and confer (0.4).	Harbison, Kenyon	2.7	1,202.85	66,406.95	WO HD TR
03/07/16	6836326	Follow up with G. Lopez relating to documents to produce to SEC (0.1); follow up with SEC on GBC subpoena query (0.1).	Harbison, Kenyon	0.2	89.10	66,496.05	WO HD TR
03/09/16	6802670	Confer with Receiver, counsel, and counsel for Celtic Bank re outstanding discovery and investigation issues (1.5).	Del Castillo, Joshua A.	1.5	742.50	67,238.55	WO HD TR
03/09/16	6803570	Follow up re: GBC production and updates to client, multiple emails (0.3); call with R. Lieu about accounting/investigation issues	Harbison, Kenyon	2.9	1,291.95	68,530.50	WO HD TR

### Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 73 of 100 Page ID #:1923 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00004 (Investigation/Reporting) 375525-00004

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		relating to bank subpoenas (0.2); review and analysis of timing issues and related correspondence relating to these subpoenas (0.3); call with S. Donell and J. del Castillo relating to, in relevant part, bank subpoena issues (0.3); review and revise BofA follow up letter and related correspondence (0.4); long email to accountants about accounting status and issues and related review of documents (0.5); revised and served new East West Bank and CNB subpoenas and provided notice (0.4); review Park Place production and direct M. Zonne on how to get it to R. Lieu, plus email to R. Lieu relating to the same (0.2); call with counsel for Celtic Bank, portion relating to discovery issues, as detailed in relevant part here (0.2); additional follow up and review of correspondence relating to GBC bank production expectations (0.1).					
03/09/16	6820658	Review records re: BofA; (.1) draft letter to BofA; (.3) conduct research and draft East West Mason subpoena and exhibit; (.3) send Park Place documents to Brandlin; (.1) confer re: additional documents needed outside of subpoena; (.2) draft CNB II subpoena re: the same; (.2) confer re: bank of the west documents and review records of BofA (.1); draft letter to BofA (.3); conduct research and draft EastWest Mason subpoena and exhibit (.3); send Park Place documents to Brandlin (.1) confer re	Zonne, Melissa K.	1.4	428.40	68,958.90	WO HD TR

### Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 74 of 100 Page ID #:1924 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00004 (Investigation/Reporting) 375525-00004

Trans Date	Index	Description of Service Rendered additional documents needed outside of subpoena re the same (.2); draft CNB II subpoena re the same (.2); confer re bank of the west documents	Timekeeper	Hours	Fees	Sum	Circle Action
03/10/16	6803986	and password (.2) Attention to pending discovery issues and confer re same (0.9); analysis of issues associated with Entity-required investor counsel and investigate potential recovery claims re same (1.0).	Del Castillo, Joshua A.	1.9	940.50	69,899.40	WO HD TR
03/10/16	6825169	Follow up relating to Utah miscellaneous case filing (0.1).	Harbison, Kenyon	0.1	44.55	69,943.95	WO HD TR
03/10/16	6825170	Review relating to A. Chi deposition subpoena (0.1); communications with R. Lieu relating to forensic accounting and relating to documents and status of information (0.6); communications relating to CNB and East West new subpoenas (0.3); additional call with T. Donell about iDiscovery and related issues and other analysis (0.4).	Harbison, Kenyon	1.4	623.70	70,567.65	WO HD TR
03/10/16	6825217	Correspondence with Receiver's staff re: translations for website (0.3).	Hsu, Tim	0.3	113.40	70,681.05	WO HD TR
03/10/16	6812103	Draft Park Place letter and review/create document copies and send to Brandlin (.2) search Mason document database for key terms and East West bank information (.1)`	Zonne, Melissa K.	0.3	91.80	70,772.85	WO HD TR
03/11/16	6806201	Review and revise outlines for Forensic Accounting Report and First Interim Report (1.0); review documents in connection with same (.5); confer with counsel and	Del Castillo, Joshua A.	2.0	990.00	71,762.85	WO HD TR

### Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 75 of 100 Page ID #:1925 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00004 (Investigation/Reporting) 375525-00004

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		Receiver's team re production of documents and requested by SEC (0.5).					
03/11/16	6808628	Dealing with various discovery related issues and follow ups (0.3); communications relating to Mason financials in the Mason production (0.2).	Harbison, Kenyon	0.5	222.75	71,985.60	WO HD TR
03/11/16	6812014	Correspondence re: Mason searches and East West records (business plans, escrow instructions, etc.)	Zonne, Melissa K.	0.2	61.20	72,046.80	WO HD TR
03/14/16	6806303	Confer with counsel re forensic accounting report (0.5); review notes and documents provided by forensic accountants and commence preparation of document (1.0).	Del Castillo, Joshua A.	1.5	742.50	72,789.30	WO HD TR
03/14/16	6808680	Dealing with GBC supplemental production issues (0.1); follow up with B. La Rock relating to drives needed for documents from Yanrob's computers and communications with T. Donell (0.3);	Harbison, Kenyon	0.1	44.55	72,833.85	WO HD TR
03/14/16	6812004	Review and facilitate production of GBC international bank documents; (.4)	Zonne, Melissa K.	0.4	122.40	72,956.25	WO HD TR
03/15/16	6807977	E-mails and teleconferences with Receiver, counsel, and SEC re funds recovered and accounting issues (1.0); review documents and confer with counsel re investigation and reporting issues and outstanding tasks (2.0).	Del Castillo, Joshua A.	3.0	1,485.00	74,441.25	WO HD TR
03/15/16	6808685	Correspondence re: BofA subpoena, drafted new subpoena and served	Harbison, Kenyon	0.9	400.95	74,842.20	WO HD TR

### Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 76 of 100 Page ID #:1926 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00004 (Investigation/Reporting) 375525-00004

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		(0.4); correspondence relating to Elluma production and iDiscovery production (0.3); additional communications relating to GBC and Bank of America subpoenas (0.2).					
03/15/16	6811966	Phone call with BofA representative re: second production and need for additional subpoena; (.3) draft second subpoena and exhibit A to BofA; (.5)	Zonne, Melissa K.	0.8	244.80	75,087.00	WO HD TR
03/16/16	6825594	Handling production of documents to the SEC and correspondence with the SEC relating to the same, including revisions to letter to the SEC (0.8).	Harbison, Kenyon	0.8	356.40	75,443.40	WO HD TR
03/16/16	6813384	Finalize and send out flash drives of documents to SEC; (.2) correspondence re: modification and production of Hiraide documents; (.1) draft cover letter to SEC (.1)`	Zonne, Melissa K.	0.4	122.40	75,565.80	WO HD TR
03/17/16	6825702	Review and respond to CNB relating to extension on document production (0.2).	Harbison, Kenyon	0.2	89.10	75,654.90	WO HD TR
03/17/16	6825709	Gathering information relating to first quarterly status report, multiple calls and document gathering (1.6).	Harbison, Kenyon	1.6	712.80	76,367.70	WO HD TR
03/18/16	6825721	Additional gathering of information relating to first quarterly status report, including phone calls and gathering of documents.	Harbison, Kenyon	0.4	178.20	76,545.90	WO HD TR
03/18/16	6822426	Review service dates of CNB and Celtic subpoenas; (.1) phone call with counsel at MBLK re: reimbursement money and document retrieval; (.1)	Zonne, Melissa K.	0.2	61.20	76,607.10	WO HD TR
03/21/16	6812403	Prepare executive summary and	Del Castillo, Joshua	2.5	1,237.50	77,844.60	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		revised outline for Forensic Accounting Report and circulate skeletal document for review, comment, and completion by Receiver and forensic accountant (2.5).	A.				
03/22/16	6825800	Correspondence with R. Lieu relating to Park Place and Banco Popular (0.1).	Harbison, Kenyon	0.1	44.55	77,889.15	WO HD TR
03/23/16	6814719	Confer with Receiver, counsel, and forensic accountants re discovery and forensic accounting matters (1.0).	Del Castillo, Joshua A.	1.0	495.00	78,384.15	WO HD TR
03/23/16	6825831	Review of emails relating to new escrow account issue and left word with S. Bates (0.4); call with S. Bates about Park Place escrow issues (0.2); additional call with J. del Castillo and left word with S. Bates relating to Mentone original purchase documents (0.4); dealing with East West production (0.1); communications with S. Bates relating to Park Place documents, calls with S. Bates relating to the same (0.3).	Harbison, Kenyon	1.5	668.25	79,052.40	WO HD TR
03/23/16	6825832	Call with Richard Lieu re: forensic accounting questions (0.2); correspondence re: getting documents to Richard Leiu and related review re: forensic accounting (0.1).	Harbison, Kenyon	0.3	133.65	79,186.05	WO HD TR
03/24/16	6825881	Email to N. Woodward relating to escrow account documents and information and related review/preparation (0.3); other review	Harbison, Kenyon	0.9	400.95	79,587.00	WO HD TR

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		relating to Park Place Escrow account issues and communications relating to the same (0.6).					
03/24/16	6825882	Drafted/revised access request to the SEC (0.4); extensive communications relating to other receivership issues (0.3).	Harbison, Kenyon	0.7	311.85	79,898.85	WO HD TR
03/25/16	6817194	Confer re First Quarterly Status Report and Forensic Accounting Report (1.1).	Del Castillo, Joshua A.	1.1	544.50	80,443.35	WO HD TR
03/25/16	6817942	Drafting and related review relating to quarterly status report.	Harbison, Kenyon	1.9	846.45	81,289.80	WO HD TR
03/25/16	6825920	Calls with R. Lieu relating to forensic accounting (0.3); originated Orange Coast subpoena (0.1).	Harbison, Kenyon	0.4	178.20	81,468.00	WO HD TR
03/25/16	6824336	Review correspondence re: orange community docs to Brandlin; (.2) draft Orange Title Co subpoena and exhibit; (.2)	Zonne, Melissa K.	0.4	122.40	81,590.40	WO HD TR
03/27/16	6817945	Additional work and drafting relating to quarterly status report.	Harbison, Kenyon	2.0	891.00	82,481.40	WO HD TR
03/28/16	6818590	Review draft Forensic Accounting Report and confer with counsel re same (0.9); prepare inquiries to Celtic Bank re outstanding loan balance and respond to correspondence re same (0.1).	Del Castillo, Joshua A.	1.0	495.00	82,976.40	WO HD TR
03/28/16	6822551	Call with J. del Castillo relating to forensic accounting (0.2); review of forensic accounting report and additional call with J. del Castillo (0.2); call with Richard Lieu on forensic accounting (0.3); email to R.	Harbison, Kenyon	5.5	2,450.25	85,426.65	WO HD TR

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Trans Date	Index	Description of Service Rendered Lieu (0.2); additional drafting relating to first quarterly report (4.1); call with R. Lieu relating to additional forensic accounting issues (0.2); other emails relating to discovery issues, with G.	Timekeeper	Hours	Fees	Sum	Circle Action
03/28/16	6819567	Lopez and others (0.3).  Confirm cancellation of hearing; (.1) draft outline of discovery and investigation numbers for report; (.3) review correspondence from CNB and pay invoice; (.1)``	Zonne, Melissa K.	0.5	153.00	85,579.65	WO HD TR
03/29/16	6819819	Review and confer re draft forensic accounting report (0.9).	Del Castillo, Joshua A.	0.9	445.50	86,025.15	WO HD TR
03/29/16	6820484	Additional drafting re: quarterly status report (1.8); call with R. Lieu relating to additional changes to forensic accounting report draft (0.3); call and review re: Wieland cost-to-complete analysis (0.1); other analysis and communications relating to quarterly status report (0.4).	Harbison, Kenyon	2.6	1,158.30	87,183.45	WO HD TR
03/30/16	6820777	Confer with counsel, Receiver, and forensic accountants re status of forensic accounting report and upcoming meet and confer efforts (0.5); confer with counsel re status of pending and outstanding discovery (0.5).	Del Castillo, Joshua A.	1.0	495.00	87,678.45	WO HD TR
03/30/16	6824509	SEC v. Yang: upload documents produced by City National Bank and prepare letters to Sarah Bates and Jeff Brandlin re: same (.5).	Lopez, George A.	0.5	119.25	87,797.70	WO HD TR
03/31/16	6822683	Review documents and confer with counsel re forensic accounting report (0.8); review and respond to e-mails	Del Castillo, Joshua A.	2.6	1,287.00	89,084.70	WO HD TR

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Trans Date	Index	Description of Service Rendered re same (0.8); review and revise Quarterly Status Report and confer re same (1.0).	Timekeeper	Hours	Fees	Sum	Circle Action
03/31/16	6824490	SEC v. Yang: upload supplemental production of documents from Celtic Bank onto CD-Roms to send to SEC and FDIC.	Lopez, George A.	0.4	95.40	89,180.10	WO HD TR
03/31/16	6824202	Review and correspondence relating to productions from Celtic and Bank of America (0.4); review relating to forensic accounting (0.8).	Harbison, Kenyon	1.2	534.60	89,714.70	WO HD TR
03/31/16	6825284	Copy BofA production for receiver's office and facilitate filing and review; (.3) review Celtic Bank production issues and facilitate documents to receiver; (.2)	Zonne, Melissa K.	0.5	153.00	89,867.70	WO HD TR

### Disbursements for Matter 375525-00004 (Investigation/Reporting)

Trans Date	Index	Туре	Quantity	Amt	Circle Ac	tion
01/19/16	2203769	Service of Process Nationwide Legal, LLC Nationwide Legal: Bank of the West - Subpoena to Produce Serve Docs ^ 141062.	1.00	55.00	WO HD	TR
01/19/16	2208460	Service of Process Nationwide - BRUCE MARSHALL JONES ^ 141391	1.00	287.00	WO HD	TR
03/10/16	2213370	Production of Documents City National Bank SEC v. Robert Yang et al ^14325	1.00	150.00	WO HD	TR
03/24/16	2223459	Messenger Nationwide - MULLIGAN BESWICK LEVINE & KNOX ^ 142518	1.00	202.95	WO HD	TR
03/28/16	2217669	Telecopier	3.00	6.00	WO HD	TR

### Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 81 of 100 Page ID #:1931 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00004 (Investigation/Reporting) 375525-00004

Trans Date	Index	Туре	Quantity	Amt Circle	Action
03/30/16	2217924	Telephonic Court Appearance Court Call San Bernardino Superior Court-San Bernardino Dis Judge Brian S. McCarville ^Melissa Zonne	1.00	86.00 WO	HD TR
03/30/16	2220409	Messenger Federal Express Invoice No: 537752818 2191 Ship To: Sarah Bates	1.00	10.78 WO	HD TR

#### **Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David R. Zaro	4.9	670.50	3,285.45
001842	Joshua A. Del Castillo	79.0	495.00	39,105.00
001928	George A. Lopez	0.9	238.50	214.65
001977	Kenyon Harbison	54.8	445,50	24,413.40
002055	Tim Hsu	0.3	378.00	113.40
002191	Melissa K. Zonne	74.3	306.00	22,735.80
		214.2		89,867.70
Total Fees				89,867.70
Total Disbursements				797.73

#### **Attorney Billing Instructions**

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

#### **Billing Instructions**

expires 6/30/2016: 10% automatic discount on rates

#### Account Summary- As Of 03/31/2016

	(	Calendar YTD	LTD			
	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	102,639.48	101,841.75	797.73	102,654.48	101,841.75	812.73
Unbilled Adj	(596.85)	(581.85)	(15.00)	(596.85)	(581.85)	(15.00)
Billed	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00

### Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 82 of 100 Page ID #:1932 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00004 (Investigation/Reporting) 375525-00004

AR Write Off	(596.85)	(581.85)	(15.00)	0.00	0.00	0.00
	Total	Fees	Cost			
WIP Balance	136,809.51	135,886.05	923.46			
AR Balance	0.00	0.00	0.00			
Unallocated Payment	0.00					
Client Trust Balance	0.00					

#### **Billing Address**

Stephen J. Donell, Receiver - FedReceiver, Inc. FedReceiver Inc 12121 Wilshire Blvd., Suite 301 Los Angeles, CA 90025 ATTN:

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#:1933 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00005 (Investor Communications) 375525-00005

#### **Preliminary Billing Form**

Billing Atty: 001842 - Joshua Del Castillo

Matter #: 375525-00005

Matter Name: Investor Communications

Date of Last Billing:

Client Name: Stephen J. Donell, Receiver - FedReceiver, Inc.

Proforma Number 1266551 Client/Matter Joint Group # 375525-1

#### Fees for Matter 375525-00005 (Investor Communications)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action	on
01/22/16	6759696	Teleconference with attorney J. Kopel re inquiry on behalf of investor clients regarding status of receivership and asset recovery efforts (0.4); prepare update and inquiry to Receiver and counsel re same (0.1).	Del Castillo, Joshua A.	0.5	247.50	247.50	WO HD	TR
01/27/16	6763646	Review e-mails and voicemails from attorney J. Kopel in connection with investor inquiries (0.2).	Del Castillo, Joshua A.	0.2	99.00	346.50	WO HD	TR
01/28/16	6764609	Teleconference with D. Zaro re J. Kopel inquiry (0.1); review correspondence and teleconference with J. Kopel re investor inquiries (0.2).	Del Castillo, Joshua A.	0.3	148.50	495.00	WO HD	TR
02/01/16	6769220	Teleconference with S. Lesowitz, counsel for investors, re status of case and potential litigation (0.5).	Del Castillo, Joshua A.	0.5	247.50	742.50	WO HD	TR
02/18/16	6783453	Teleconference with T. Romero, counsel for Suncor investors, re status of receivership, investigation, asset recovery, and immigration matters (0.3); confer with counsel re same (0.3).	Del Castillo, Joshua A.	0.6	297.00	1,039.50	WO HD	TR
02/18/16	6783741	Prepare for and teleconference with	Del Castillo, Joshua	1.0	495.00	1,534.50	WO HD	TR

### Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 84 of 100 Page ID #:1934 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00005 (Investor Communications) 375525-00005

Trans Date	Index	Description of Service Rendered J. Kopel re investor inquiries (1.0).	Timekeeper A.	Hours	Fees	Sum	Circle Action
02/22/16	6785708	Review documents received from and respond to correspondence from T. Romero, counsel for investors (0.5).	Del Castillo, Joshua A.	0.5	247.50	1,782.00	WO HD TR
02/25/16	6789763	Review and respond to investor inquiries and confer with counsel re same (0.9).	Del Castillo, Joshua A.	0.9	445.50	2,227.50	WO HD TR
02/26/16	6790517	Review correspondence from investors and confer with Receiver and counsel re new procedures and goals for investor communications, including via website and Chinese language translations (1.0).	Del Castillo, Joshua A.	1.0	495.00	2,722.50	WO HD TR
02/29/16	6793822	Review and respond to correspondence from counsel for investors and confer with Receiver re same (0.8).	Del Castillo, Joshua A.	0.8	396.00	3,118.50	WO HD TR
03/07/16	6800133	Review inquires from investors and confer with counsel re Mandarin translation of basic update to investors (0.5); provide update and translation to Receiver for posting on website (0.2).	Del Castillo, Joshua A.	0.7	346.50	3,465.00	WO HD TR
03/09/16	6802896	Review and respond to correspondence and inquiries from investors (0.6).	Del Castillo, Joshua A.	0.6	297.00	3,762.00	WO HD TR
03/09/16	6836396	Respond to investor with details on receiver website and related correspondence and review (0.2).	Harbison, Kenyon	0.2	89.10	3,851.10	WO HD TR
03/10/16	6803995	Review and respond to inquiry from investor counsel and confer with Receiver re same (0.4).	Del Castillo, Joshua A.	0.4	198.00	4,049.10	WO HD TR

### Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 85 of 100 Page ID #:1935 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00005 (Investor Communications) 375525-00005

0.00

Unbilled Adj

0.00

0.00

Trans Date	Index	Description of	of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
03/14/16	6807516	investors and proposed sup	onal inquiries from confer with counsel re plemental update and ningstar translations	Del Castillo, Joshua A.	0.9	445.50	4,494.60	WO HD TR_
03/23/16	6814707		ce with counsel for atus of receivership case	Del Castillo, Joshua e A.	0.5	247.50	4,742.10	WO HD TR
03/24/16	6816426	Teleconference investor (0.3).	ce with attorney for	Del Castillo, Joshua A.	0.3	148.50	4,890.60	WO HD TR
Proforma S	ummary							
Timekeeper l	Number	Timekeep	er	Hours		Rate	Amour	its
001842 001977		Joshua A. Kenyon Ha	Del Castillo arbison	9.7 0.2 9.9	.2 445.50		4,801. 89. 4,890.	10
Total Fees Total Disburse	ements			9.9			4,890. 0.0	60
Attorney Bi	illing Instru	ctions						
( ) E	BILL ALL BILL FEES O BILL COST O		( ) ( ) ( )	Hold Write Off Transfer All				
Billing Inst	ructions							
expires 6/30/	/2016: 10% a	automatic discour	nt on rates					
Account Su	ımmary- As	of 03/31/2016	6					
		Calend	lar YTD		LTD			
	Vorked	Total 4,890.60	Fees Disbursem	nent Total 0.00 4,890.60	Fees 4,890.60	Disbursement 0.00		

0.00

0.00

0.00

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0.00 0.00 0.00

05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00005 (Investor Communications) 375525-00005

Billed	0.00	0.00	0.00	0.00	0.00	
Collected	0.00	0.00	0.00	0.00	0.00	
AR Write Off	0.00	0.00	0.00	0.00	0.00	
	Total	Fees	Cost			
WIP Balance	5,583.60	5,583.60	0.00			
AR Balance	0.00	0.00	0.00			
Unallocated Payment	0.00					
Client Trust Balance	0.00					

#### **Billing Address**

Stephen J. Donell, Receiver - FedReceiver, Inc. FedReceiver Inc 12121 Wilshire Blvd., Suite 301 Los Angeles, CA 90025 ATTN:

### Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 87 of 100 Page ID #:1937 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00006 (Sale of Assets/Disposition) 375525-00006

#### Preliminary Billing Form

Billing Atty: 001842 - Joshua Del Castillo

Matter #: 375525-00006

Matter Name: Sale of Assets/Disposition

Date of Last Billing:

Client Name: Stephen J. Donell, Receiver - FedReceiver, Inc.

Proforma Number 1266552

Client/Matter Joint Group # 375525-1

#### Fees for Matter 375525-00006 (Sale of Assets/Disposition)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
02/22/16	6787867	Work with counsel/Receiver re disposition of the Fontana and Hesperia projects (.4).	Zaro, David R.	0.4	268.20	268.20	WO HD TR
03/11/16	6806198	Review documents, e-mails, and teleconferences re potential sale of Hesperia, Fontana, and Lynwood properties (1.5); confer with counsel re same (0.5).	Del Castillo, Joshua A.	2.0	990.00	1,258.20	WO HD TR
03/21/16	6812404	Review BOVs and confer with Receiver re asset disposition issues (0.5).	Del Castillo, Joshua A.	0.5	247.50	1,505.70	WO HD TR
03/21/16	6812407	Review correspondence in connection with contemplated sale of receivership property (0.3); teleconference with Receiver re same and prepare follow-up e-mail and inquiry to M. Hiraide (0.5).	Del Castillo, Joshua A.	0.8	396.00	1,901.70	WO HD TR
03/24/16	6815475	Confer with M. Hiraide and S. Donell re asset disposition issues (0.5).	Del Castillo, Joshua A.	0.5	247.50	2,149.20	WO HD TR
03/25/16	6816433	Review materials and correspondence in connection with asset disposition issues and confer with counsel and Receiver re same (0.8).	Del Castillo, Joshua A.	0.8	396.00	2,545.20	WO HD TR

# Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 88 of 100 Page ID #:1938 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00006 (Sale of Assets/Disposition) 375525-00006

Trans Date	Index	Description of Samina B	andarad	Timekeeper	Hours	Fees	Sum	Circle Action
		Description of Service Ro	enuereu	•				
03/28/16		Review and respond to correspondence from M. H defendants' contingent am 28 U.S.C. 2001 waiver and with counsel re same (0.5)	enability to I confer	Del Castillo, Joshua A.	0.5	247.50	2,792.70	WO HD TR
03/31/16		Legal analysis of issues pr asset disposition proposals		Del Castillo, Joshua A.	1.0	495.00	3,287.70	WO HD TR
Proforma S	ummary							
Timekeeper N	lumber	Timekeeper		Hours		Rate	Amount	ts
000313 001842		David R. Zaro Joshua A. Del Castillo		0.4 6.1 6.5		670.50 495.00	268.2 3,019.5 3,287.7	50
Total Fees				0.0			3,287.7	
Total Disburse	ments						0.00	)
Attorney Bi	lling Instructi	ons						
( ) B	ILL ALL ILL FEES ONL ILL COST ONL		)	Hold Write Off Transfer All				
Billing Instr	uctions							
expires 6/30/2	2016: 10% auto	omatic discount on rates						

### Account Summary- As Of 03/31/2016

	C	alendar YTD	LTD			
	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	3,337.20	3,337.20	0.00	3,337.20	3,337.20	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00

Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 89 of 100 Page ID #:1939 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00006 (Sale of Assets/Disposition) 375525-00006

	Total	Fees	Cost
WIP Balance	5,168.70	5,168.70	0.00
AR Balance	0.00	0.00	0.00
Unallocated Payment	0.00		
Client Trust Balance	0.00		

#### **Billing Address**

Stephen J. Donell, Receiver - FedReceiver, Inc. FedReceiver Inc 12121 Wilshire Blvd., Suite 301 Los Angeles, CA 90025 ATTN:

### Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 90 of 100 Page ID

#:1940 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00007 (Pending Litigation) 375525-00007

#### **Preliminary Billing Form**

Billing Atty: 001842 - Joshua Del Castillo

Matter #: 375525-00007

Matter Name: Pending Litigation

Date of Last Billing:

Client Name: Stephen J. Donell, Receiver - FedReceiver, Inc.

Proforma Number 1266553 Client/Matter Joint Group # 375525-1

#### Fees for Matter 375525-00007 (Pending Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
12/15/15	6731237	Review dockets re additional, pending litigation and confer with client re same (0.5); review and respond to correspondence re counsel in pending litigation (0.2).	Del Castillo, Joshua A.	0.7	346.50	346.50	WO HD TR
12/16/15	6731254	Review materials associated with pending state court litigation (0.7); teleconferences and e-mails with Receiver and counsel, including state court litigation counsel, re same (1.6); review and revise Notices of Pending Receivership (0.5).	Del Castillo, Joshua A.	2.8	1,386.00	1,732.50	WO HD TR
12/16/15	6743282	Dealing with pending cases issue; obtain and review documents from Bernard; review and revise notices of pending cases relating to five pending cases; review and respond to correspondence relating to documents received and other case status and document discovery emails	Harbison, Kenyon	3.9	1,737.45	3,469.95	WO HD TR
12/16/15	6770257	Analysis re consolidated cases for notice of pending receivership; research re related cases; draft notices of pending receivership for	Zonne, Melissa K.	3.0	918.00	4,387.95	WO HD TR

### Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 91 of 100 Page ID #:1941 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00007 (Pending Litigation) 375525-00007

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		numerous cases; draft related case chart to track re same					
12/17/15	6770588	Review of pending litigation documents received; communications with S. Rogers relating to notices; draft demand letter to Penman and sent to J. del Castillo; call with J. del Castillo; call with T. Donell relating to TAB issue.	Harbison, Kenyon	1.5	668.25	5,056.20	WO HD TR
12/22/15	6736711	Review and revise correspondence and turn-over demand to J. Penman (0.2).	Del Castillo, Joshua A.	0.2	99.00	5,155.20	WO HD TR
12/22/15	6741314	Review list of all pending cases and additional email correspondence from client re other cases to draft additional notices of pending receivership (.5)	Zonne, Melissa K.	0.5	153.00	5,308.20	WO HD TR
12/29/15	6739829	Review documents associated with and confer with counsel re pending litigation matters and status of all required Notices of Pending Receivership (0.3); review schedule of pending litigation and deliver revised version to M. Hiraide (0.2).	Del Castillo, Joshua A.	0.5	247.50	5,555.70	WO HD TR
01/19/16	6804664	Correspondence and analysis re: recording notices of pendency (.7).	Zonne, Melissa K.	0.7	214.20	5,769.90	WO HD TR
01/22/16	6759898	Review Park Complaint and associated materials and confer with Receiver and counsel re same (0.9); voicemail to Plaintiff's counsel (0.1).	Del Castillo, Joshua A.	1.0	495.00	6,264.90	WO HD TR
01/26/16	6762147	Teleconference and e-mails with J. Anderson, counsel for S. Park in Park v. Yang, et al. (0.5).	Del Castillo, Joshua A.	0.5	247.50	6,512.40	WO HD TR

# Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 92 of 100 Page ID #:1942 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00007 (Pending Litigation) 375525-00007

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
01/28/16	6767739	Follow up re: Park notice pendency; (.1).	Zonne, Melissa K.	0.1	30.60	6,543.00	WO HD TR
01/29/16	6768146	Confer with J. Anderson and K. Harbison re submission of Notice of Pending Receivership (0.2).	Del Castillo, Joshua A.	0.2	99.00	6,642.00	WO HD TR
02/01/16	6769284	Finalize Park v. Kano notice and assemble for filing (0.3); confer with counsel re same (0.2); review documents in connection with Park investment (0.3).	Del Castillo, Joshua A.	0.8	396.00	7,038.00	WO HD TR
02/01/16	6804707	Finalize summons and cover sheet for state filing and confer re: filing issues and venue; (.3) update miscellaneous case file chart and correspondence with G. Lopez; (.4) additional correspondence re: the same (.1).	Zonne, Melissa K.	0.8	244.80	7,282.80	WO HD TR
02/03/16	6774666	Follow up relating to notices of pending receivership and status of other cases and other matters in preparation for being out at arbitration the next two days.	Harbison, Kenyon	0.4	178.20	7,461.00	WO HD TR
02/03/16	6771985	Conduct search of San Bernardino and LA county courts for any lawsuits related to mechanics liens; (.4) set up court call and call court re: Medico case hearing Monday; (.1) update discovery logs (.1).	Zonne, Melissa K.	0.6	183.60	7,644.60	WO HD TR
02/03/16	6804747	Review all pending litigation dockets to determine active hearings and dates; (.3) update chart re: pending litigation dates and circulate; (.1) correspondence re: upcoming dates re: the same; (.1).	Zonne, Melissa K.	0.5	153.00	7,797.60	WO HD TR

### Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 93 of 100 Page ID #:1943 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00007 (Pending Litigation) 375525-00007

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Act	ion
02/04/16	6777993	Amend notice of pending receivership and file; (.3) review docket in Silbermann related litigation and schedule court call for both hearings (.3) confer re: mechanics lien issue; (.2) review docket and log re: Park v. Yang (.1)	Zonne, Melissa K.	0.9	275.40	8,073.00	WO HD	TR
02/08/16	6776332	Follow up re: third-party pending litigation and court call (0.1); review of case emails from the past five days (0.5); meeting with J. del Castillo and related coordination (0.2); coordination re: future court calls (0.2)	Harbison, Kenyon	1.3	579.15	8,652.15	WO HD	TR
02/08/16	6804755	Correspondence re: notices of pending receivership in file; (.1) court call for Medico v. Hesperia status conference and correspondence and calendaring re: call; (1.3) draft and serve notice of stay and OSC; (.4) correspondence re: upcoming OSC in Miller v. Carlone litigation; (.1)	Zonne, Melissa K.	1.9	581.40	9,233.55	WO HD	TR
02/10/16	6777686	Teleconference with J. Penman and confer with K. Harbison re upcoming hearing in related San Bernardino superior court matters (0.9).	Del Castillo, Joshua A.	0.9	445.50	9,679.05	WO HD	TR
02/17/16	6782528	Confer with K. Harbison re state court matters (0.3); teleconference with J. Penman re same (0.3).	Del Castillo, Joshua A.	0.6	297.00	9,976.05	WO HD	TR
02/17/16	6793904	Attended court call re: third party claims, separate matters pending against receivership entities, and related communications (1.1); further correspondence relating to the same (0.2).	Harbison, Kenyon	1.1	490.05	10,466.10	WO HD	TR

Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 94 of 100 Page ID #:1944 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00007 (Pending Litigation) 375525-00007

	Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action	n
	02/17/16	6804803	Draft outline of all related lit dates, send with correspondence to N. Tampinco re: calendaring related litigation dates; (.3)	Zonne, Melissa K.	0.3	91.80	10,557.90	WO HD T	R
	02/18/16	6794027	Call with J. Penman relating to all of the litigation that he is handling (0.3).	Harbison, Kenyon	0.3	133.65	10,691.55	WO HD T	R
	02/25/16	6794531	Coordination relating to tomorrow's court call on third-party pending case (0.3).	Harbison, Kenyon	0.3	133.65	10,825.20	WO HD T	R
	02/26/16	6794850	Attend case management conference in third-party case and email re: calendaring (0.7).	Harbison, Kenyon	0.7	311.85	11,137.05	WO HD T	R
	02/26/16	6794809	Review calendar and send reminder re: related litigation hearings; (.2)	Zonne, Melissa K.	0.2	61.20	11,198.25	WO HD T	R
	03/07/16	6803095	Communications with M. Zonne relating to notice in Carlone matter (0.2).	Harbison, Kenyon	0.2	89.10	11,287.35	WO HD T	R
	03/08/16	6836387	Review and revise notice of continued OSC in Carlone third-party matter, and correspondence with J. Penman's firm re: proof of service issues (0.5).	Harbison, Kenyon	0.5	222.75	11,510.10	WO HD T	'R
	03/09/16	6836394	Finalized and filed notice of OSC continuance in Carlone case (0.3)	Harbison, Kenyon	0.3	133.65	11,643.75	WO HD T	R
	03/14/16	6806337	Review and respond to voicemail from counsel in Silbermann litigation (0.3).	Del Castillo, Joshua A.	0.3	148.50	11,792.25	WO HD T	R
-	03/14/16	6836606	Review upcoming dates in related litigation (.2)	Zonne, Melissa K.	0.2	61.20	11,853.45	WO HD T	R
	03/30/16	6824407	Attend order to show cause by court call in Carlone v. Suncor matter; (.7)	Zonne, Melissa K.	0.7	214.20	12,067.65	WO HD T	R

### Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 95 of 100 Page ID #:1945 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00007 (Pending Litigation) 375525-00007

#### Disbursements for Matter 375525-00007 (Pending Litigation)

Trans Date	Index	Туре	Quantity	Amt	Circle Action
12/30/15	2199946	Service of Process Nationwide - ^ 140374	1.00	115.00	WO HD TR
12/30/15	2199947	Service of Process Nationwide - BANK OF AMERICA ^ 140374	1.00	35.00	WO HD TR
12/30/15	2199948	Service of Process Nationwide - CITIZENS BUSINESS BANK ^ 140374	1.00	157.50	WO HD TR
12/30/15	2199949	Service of Process Nationwide - CITIZENS BANK ^ 140374	1.00	312.00	WO HD TR
12/30/15	2199950	Service of Process Nationwide - EAST WEST BANK ^ 140374	1.00	105.00	WO HD TR
12/30/15	2199951	Service of Process Nationwide - ORANGE COMMUNITY ESCROW INC. ^ 140374	1.00	343.50	WO HD TR
12/30/15	2199952	Service of Process Nationwide - PARK PLACE ESCROW, INC. ^ 140374	1.00	185.85	WO HD TR
02/04/16	2203175	Duplication	104.00	19.76	WO HD TR
02/04/16	2208461	Filing Fees Nationwide - SAN BERNARDINO/CIVIL ^ 141391	1.00	270.35	WO HD TR
02/17/16	2210009	Telephonic Court Appearance CourtCall San Bernardino Superior Court-San Bernardino Dis Judge Michael A. Sachs ^Melissa Zonne	1.00	86.00	WO HD TR
02/17/16	2210010	Telephonic Court Appearance CourtCall San Bernardino Superior Court-San Bernardino Dis Judge Michael A. Sachs ^Kenyon Harbison	1.00	86.00	WO HD TR

#### **Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001842	Joshua A. Del Castillo	8.5	495.00	4,207.50
001977	Kenyon Harbison	10.5	445.50	4,677.75
002191	Melissa K. Zonne	10.4	306.00	3,182.40

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#:1946

05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00007 (Pending Litigation) 375525-00007

Total Fees
Total Disbursements

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2016: 10% automatic discount on rates

# Account Summary- As Of 03/31/2016

	С	alendar YTD			LTD	
	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	14,663.36	12,947.40	1,715.96	14,663.36	12,947.40	1,715.96
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Cost			
WIP Balance	14,597.56	12,376.35	2,221.21			
AR Balance	0.00	0.00	0.00			
Unallocated Payment	0.00					
Client Trust Balance	0.00					

# **Billing Address**

Stephen J. Donell, Receiver - FedReceiver, Inc. FedReceiver Inc 12121 Wilshire Blvd., Suite 301 Los Angeles, CA 90025 ATTN:

# Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 97 of 100 Page ID

#:1947

05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00009 (Third Party Claims) 375525-00009

# **Preliminary Billing Form**

Rilling	Attv.	001842	- Joshua	Del	Castillo
Dillilling	MILLY.	001042	- JUSHUA	Dei	Casullo

Matter #: 375525-00009

Matter Name: Third Party Claims

Date of Last Billing:

Client Name: Stephen J. Donell, Receiver - FedReceiver, Inc.

Date of Last Dilling.

Proforma Number 1266554 Client/Matter Joint Group # 375525-1

# Fees for Matter 375525-00009 (Third Party Claims)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
03/01/16	6796503	Court call re: pending matter with third party claimant against receivership entity (1.2).	Harbison, Kenyon	1.2	534.60	534.60	WO HD TR

# **Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001977	Kenyon Harbison	1.2	445.50	534.60
		1.2		534.60
Total Fees				534.60
Total Disbursements				0.00

# **Attorney Billing Instructions**

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

# **Billing Instructions**

expires 6/30/2016: 10% automatic discount on rates

# Account Summary- As Of 03/31/2016

	Calendar YTD			LTD	
Total	Fees	Disbursement	Total	Fees	Disbursement

# Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 98 of 100 Page ID #:1948 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00009 (Third Party Claims) 375525-00009

Worked	579.15	579.15	0.00	579.15	579.15	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Cost			
WIP Balance	579.15	579.15	0.00			
AR Balance	0.00	0.00	0.00			
Unallocated Payment	0.00					
Client Trust Balance	0.00					

# **Billing Address**

Stephen J. Donell, Receiver - FedReceiver, Inc. FedReceiver Inc 12121 Wilshire Blvd., Suite 301 Los Angeles, CA 90025 ATTN:

# Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 99 of 100 Page ID

#:1949

05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00011 (Employment & Professional Services) 375525-00011

# **Preliminary Billing Form**

Billing Atty: 001842 - Joshua Del Castillo

Matter #: 375525-00011

Matter Name: Employment & Professional Services

Date of Last Billing:

Client Name: Stephen J. Donell, Receiver - FedReceiver, Inc.

Proforma Number 1266555 Client/Matter Joint Group # 375525-1

# Fees for Matter 375525-00011 (Employment & Professional Services)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
01/06/16	6746510	Review and revise Motion for Order in Aid of Receivership, including to add request for authorization to abandon underwater real property assets (1.4).	Del Castillo, Joshua A.	1.4	693.00	693.00	WO HD TR
01/11/16	6751071	Review and provide final comments on draft Motion for Order in Aid of Receivership and confer with counsel re same (2.1).	Del Castillo, Joshua A.	2.1	1,039.50	1,732.50	WO HD TR
01/15/16	6754612	Confer with Z. Carlyle re Motion for Order in Aid of Receivership (0.2); confer with Receiver and counsel re same (0.6); prepare minor edit to same (0.1).	Del Castillo, Joshua A.	0.9	445.50	2,178.00	WO HD TR
01/19/16	6756213	Confer re Motion for Order in Aid and review documents in connection with same (0.5).	Del Castillo, Joshua A.	0.5	247.50	2,425.50	WO HD TR
Proforma S	Summary				·		
Timekeeper l	Number	Timekeeper	Hours		Rate	Amoun	ts
001842		Joshua A. Del Castillo	4.9		495.00	2,425.5	
			4.9			2,425.	
Total Fees						2,425.	
Total Disburse	ements					0.00	)

# Case 5:15-cv-02387-SVW-KK Document 79-1 Filed 06/03/16 Page 100 of 100 Page ID

#:1950 05/26/16 10:38:13 PROFORMA STATEMENT FOR MATTER 375525-00011 (Employment & Professional Services) 375525-00011

Attorney	/ Billing Instructions				
( )	BILL ALL BILL FEES ONLY BILL COST ONLY	(	)	Hold Write Off Transfer All	
Billing li	nstructions				

# Account Summary- As Of 03/31/2016

expires 6/30/2016: 10% automatic discount on rates

	С	alendar YTD			LTD	
	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	2,425.50	2,425.50	0.00	2,425.50	2,425.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Cost			
WIP Balance	2,425.50	2,425.50	0.00			
AR Balance	0.00	0.00	0.00			
Unallocated Payment	0.00					
Client Trust Balance	0.00					

# **Billing Address**

Stephen J. Donell, Receiver - FedReceiver, Inc. FedReceiver Inc 12121 Wilshire Blvd., Suite 301 Los Angeles, CA 90025 ATTN:

# **EXHIBIT B**

# Allen Matkins



JOSHUA A. DEL CASTILLO

# **BIOGRAPHY**

Joshua A. del Castillo is a litigation, creditors' rights, and regulatory compliance attorney practicing in the Firm's Receiverships, Lenders & Special Creditor Remedies; Restructuring, Insolvency & Bankruptcy; and Corporate Finance practice groups. Joshua's practice includes general business litigation, bankruptcy and receiverships, and regulatory compliance. Joshua represents a wide range of clients including banks and other institutional lenders, developers, receivers, monitors, secured and unsecured creditors, and other business enterprises.

Joshua has served as general litigation counsel for institutional lenders and administrators of securitized trusts throughout the state and federal court systems in California, including in connection with actions challenging the enforceability of securitized loans and associated security instruments, and frequently represents creditors in related bankruptcy proceedings. In this context, Joshua has developed significant experience in defending against efforts to divest secured creditors of their statutory and contractual rights, as well as supervising other counsel in similar matters nationwide.

Joshua also regularly serves as counsel for court-appointed permanent receivers in enforcement actions brought by the Securities and Exchange Commission, Federal Trade Commission, and other federal agencies, including in actions alleging the operation of Ponzi-like investment schemes or fraudulent business practices. Joshua's receiver clients are regularly tasked with taking over the entities used to perpetrate a fraud or other unlawful conduct, conducting necessary forensic accountings, documenting (for the benefit of the appointing court) the unlawful conduct itself, and recovering available proceeds for distribution, where possible. Joshua likewise maintains an active real property receivership practice, advising lender and receiver clients on the propriety of a receivership for a given circumstance and on the management and disposition of receivership estate property. In this context, Joshua has secured the appointment of receivers in hotly contested real property disputes and assisted real property receivers with the administration of environmentally compromised and other unusual commercial properties, including in connection with efforts to sell such properties out of receivership.

Joshua further maintains a growing regulatory compliance practice, with a focus on the Dodd-Frank Act, Fair Credit Reporting Act, Equal Credit Opportunity Act, Real Estate Settlement Procedures Act, and other related federal and state statutes. Joshua has successfully represented lenders and other business enterprises in litigation alleging regulatory violations, as well as provided regulatory compliance and analysis advice to lenders, investment and telecommunications companies, public interest organizations, and others.

Joshua has represented clients before state and federal courts throughout California, including the California Court of Appeal, the United States Bankruptcy Appellate Panel of the Ninth Circuit, and the Ninth Circuit Court of Appeals.

Joshua has been an active participant in and advocate for *pro bono* work since his arrival at Allen Matkins, and presently serves as a *pro bono* bankruptcy and litigation advisor to the Wage Justice Center, a public-interest organization that collaborates with community groups, workers' centers and legal services providers to advance low-income workers' rights, educate workers, and advocate on the law and best practices for collecting unpaid wages. Joshua has also represented clients, *pro bono*, in Constitutional rights, creditors' rights, regulatory compliance, and securities matters.

#### **MEMBERSHIPS**

- Financial Lawyers Conference
- California Receivers Forum
- Hispanic National Bar Association
- · National Association of Federal Equity Receivers

# **ACCOLADES**

- Pro Bono Award, Wage Justice Center (2009)
- Selected for inclusion in Super Lawyers' Southern California Rising Stars (2012 - 2015)



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Joshua received his B.A. in economics, *cum laude*, from the University of Southern California in 1996. He received his M.A. in anthropology, with a subspecialty in economic anthropology and development, from the University of Michigan in 1998, advancing to Ph.D. candidacy in 2000. In 2005, Joshua received his J.D. from University of Southern California Gould School of Law.

While in law school, Joshua was awarded an Olin Foundation/USC Center for Law, Economics, and Organization scholarship, and was selected as a member of the inaugural class of USC Law School Summer Fellows. In addition, Joshua was a member of the law school's Hale Moot Court Honors Program, placing as a semi-finalist, and later served as an editor on the Hale Moot Court Board and was a member of the USC National Moot Court team.

# **BAR ADMISSIONS**

California

## **COURT ADMISSIONS**

- · All California state courts
- U.S. District Court, Northern District of California (including Bankruptcy Court)
- U.S. District Court, Eastern District of California (including Bankruptcy Court)
- U.S. District Court, Central District of California (including Bankruptcy Court)
- U.S. District Court, Southern District of California (including Bankruptcy Court)
- Ninth Circuit Court of Appeals
- United States Bankruptcy Appellate Panel of the Ninth Circuit
- · Supreme Court of the United States

#### REPRESENTATIVE MATTERS

#### Litigation and Bankruptcy

- Commercial Lenders. Represented a national, commercial lender in connection with a large bankruptcy and breach of contract dispute, in both state and federal courts.
- Developers. Represented national developers in connection with preferential transfer claims brought by bankruptcy trustees.
- Law Firms. Represented a national law firm in connection with the bankruptcy of a large client.
- Mortgage Lenders. Represented a number of the nation's largest mortgage lenders in multiple commercial litigation matters, in both state and federal courts, including courts of appeal.
- **Non-Profit Organizations.** Provided *pro bono* assistance to a non-profit organization representing indigent and low-income workers in employment disputes.

# **Federal Equity Receiverships**

- Securities and Exchange Commission v. Plus Money, Inc., et al., (U.S. District Court, Southern District of California). Represented a receiver appointed in a Securities and Exchange Commission enforcement action alleging a \$45 million Ponzi-like investment scheme based on purported covered-call option trading. Receiver marshaled assets and distributed funds to defrauded investors.
- Securities and Exchange Commission v. Pacheco, et al., (U.S. District Court, Southern
  District of California). Represented a receiver appointed in a Securities and Exchange
  Commission enforcement action alleging a \$15 million Ponzi-like investment scheme bases on
  purported covered-call option trading. Receiver marshaled assets and distributed funds to
  defrauded investors
- Securities and Exchange Commission v. Medical Capital Holding, et al., (U.S. District Court, Central District of California). Represented a receiver appointed in a Securities and Exchange Commission enforcement action alleging a Ponzi-like investment scheme which raised over \$1 billion, ostensibly to purchase medical receivables.
- Securities and Exchange Commission v. Global Online Direct, Inc., et al., (U.S. District Court, Northern District of Georgia). Represented a receiver appointed in a Securities and Exchange Commission enforcement action alleging that the defendant entities raised over \$45 million through the sale of unregistered securities.
- Securities and Exchange Commission v. Trabulse, et al., (U.S. District Court, Northern District of California). Represented a receiver appointed to monitor a hedge fund, at the request of the Securities and Exchange Commission.
- Federal Trade Commission v. Consumer Advocates Group, LLC, et alio U.S. District 116

# Case 5:15-cv-02387-SVW-KK Document 79-2 Filed 06/03/16 Page 4 of 20 Page ID #:1954

**Court, Southern District of California).** Represented a receiver appointed at the request of the Federal Trade Commission in connection with an enforcement action alleging deceptive and fraudulent mortgage modification practices.

#### Real Property Receiverships

- Excel National Bank v. Tolosa Sison Family Corp., et al., (Superior Court of California, County of San Mateo). Represented a real property receiver appointed to administer receivership estate substantially comprised of service station and convenience store assets.
- First Citizens Bank & Trust Co. v. NDustrial Drive LLC, et al., (Superior Court of California, County of San Joaquin). Represented a real property receiver appointed to administer receivership estate substantially comprised of abandoned recycling facility. Assisted receiver with site clean-up, marketing, and sale efforts.
- Wachovia Bank, NA v. Downtown Sunnyvale Residential, LLC, et al., (Superior Court of California, County of Santa Clara). Represented a real property receiver appointed over a large-scale commercial development in connection with successfully securing trial court approval of the receiver's administration and improvement of the development, as well as approval of the receiver's compensation and discharge request.

#### **Regulatory Compliance**

- Real Property Brokerage. Represented one of the Southwest's largest real property brokerages in connection with litigation alleging a violation of federal consumer protection statutes.
- Lenders and Institutional Investors. Represented lender in connection with litigation alleging
  systematic violations of the Fair Credit Reporting Act. Represented national institutional
  investor in connection with revision of internal policies and procedures for compliance with
  new or revised consumer protection statutes.
- Telecommunications Business. Represented cell tower leasing entity in connection with
  policies and procedures for compliance with new or revised consumer protection statutes.
- Public Interest Organizations. Provided analysis of applicability of provisions of Dodd-Frank Act to highly publicized business practices of so-called buy-here / pay-here automobile dealerships.

# **EVENTS**

California Bankruptcy Forum's 26th Annual Insolvency Conference 5/16/2014

Speakers: Joshua A. del Castillo and Ted G. Fates

# **PUBLICATIONS**

# **LEGAL ALERTS**

21-Dec- 2015	Evolving Home-Sharing Market Prompts a Variety of Local Regulations
18-May- 2015	Two Recent Decisions Potentially Expand Fraudulent Transfer Exposure in Ponzi Schemes
02-Dec- 2014	Financial Institutions May Post Online Privacy Disclosures
18-Dec- 2013	New California Court of Appeal Decision Reaffirms General Rule that Residential Lenders Owe no Duty to Borrowers, Including in the Loan Modification Context
16-Apr-2013	New California Court of Appeal Decision May Affect Administration of Foreclosure-Avoidance Actions
17-Sep-2012	Recent Ninth Circuit Decision Emphasizes Importance Of Remaining Vigilant – And Current – In Connection With Consumer Finance Regulation Compliance

# Case 5:15-cv-02387-SVW-KK Document 79-2 Filed 06/03/16 Page 5 of 20 Page ID #:1955

20-Jul-2012 "Who is going to pay for this?"

California Court of Appeal Highlights Receiver

Compensation Issues

01-Feb-2012 Recent Seventh and Ninth Circuit Cases Affect Federal

**Equity Receiverships** 

17-Aug-2011 California Superior Court Invalidates Receiver's Sale of

Real Property Holding That the Sale of Collateral Over

the Objection of the Borrower is Tantamount to

Foreclosure

This alert applies to secured lenders and court-appointed real property receivers considering the disposition of receivership estate property by receiver's sale.

#### **ARTICLES**

15-Dec- The Evolving Home-Sharing Market Prompts a Variety of

2015 Local Regulations

By Joshua A. del Castillo, Tim C. Hsu and Timothy M.

Hutter in Western Real Estate Business

20-May- Unwitting transfers to Ponzi schemes

2015 by Joshua A. del Castillo and Ted G. Fates in Daily

Journal

01-Dec- What Flagstar Bank Can Teach Mortgage Servicers and

2014 Others About the CFPB

By Joshua A. del Castillo and Kenyon D. Harbison in

California Mortgage Finance News

27-May- Update on Evolving California Homeowner's Bill of Rights

2014 Case Law

By Joshua A. del Castillo and Kenyon Harbison in

California Mortgage Finance News

01-Sep-2013 California Foreclosure Proceedings: Recent court

decisions may illustrate trends in foreclosure-avoidance

actions

By Joshua A. del Castillo and Tim C. Hsu in Scotsman

Guide Residential Edition

01-Jul-2013 Adverse Action Notices in a Fluid Regulatory

**Environment** 

By Joshua A. del Castillo and Kenyon Harbison in CMBA

Legal News

02-Jan-2013 For Sale by Receiver

By Joshua A. del Castillo, co-author, in Scotsman Guide

27-Feb-2012 Sales by Rents and Profits Receivers: A Discussion of

the Practice and Governing Law

By Joshua A. del Castillo, co-author, in Receivership

News

06-Feb-2012 7th, 9th Circuit Cases To Affect Federal Equity

Receiverships

By Joshua A. del Castillo and Ted G. Fates in Daily

# Case 5:15-cv-02387-SVW-KK Document 79-2 Filed 06/03/16 Page 6 of 20 Page ID #:1956

Journal

23-Jun-2010 Respecting Foreclosure: Section 2923.5 Remedies

Clarified

By Joshua A. del Castillo and Kenyon D. Harbison in Los

Angeles Daily Journal

01-Jan-2008 The New Age of Real Estate Loan Defaults

By Joshua A. del Castillo, co-author in Real Property Law

Reporter

## **PRESS & MEDIA**

26-May- Lawyers React To Justices' Ruling On Bankruptcy Court

2015 Power

Joshua del Castillo in Law360

03-Jul-2014 55 Allen Matkins Attorneys Named Among Super

Lawyers and Rising Stars 2014

11-Jul-2013 60 Allen Matkins Attorneys Named Among Super

Lawyers 2013 and Rising Stars 2013

19-Jul-2012 61 Allen Matkins Attorneys Named Among Super

Lawyers 2012 and Rising Stars 2012

More Than 40 Percent of Firm's Partners Make the List

## **VIDEOS**

08-Jan-2013 The FCRA, ECOA and the Consumer Financial

Protection Bureau: Two Areas of Ambiguity the Bureau

May Address

# Allen Matkins CHALLENGE, OPPORTUNITY, SUCCESS



DAVID R. ZARO

# **BIOGRAPHY**

David R. Zaro is a partner in our Los Angeles office, where his practice focuses upon litigation with an emphasis upon creditors' rights, bankruptcy litigation, and state and federal receiverships. David represents a wide range of clients including banks and other institutional lenders, developers, landlords, receivers, examiners, secured and unsecured creditors, and other business enterprises.

David has extensive experience as a bankruptcy lawyer as well as a trial lawyer in federal and state courts in California and several other jurisdictions. His experience in the field of insolvency, creditors' rights, and bankruptcy litigation includes out-of-court workouts and restructurings, federal and state court receiverships, and bankruptcy reorganization proceedings. David also advises residential and commercial lenders and others regarding all aspects of commercial law with regard to commercial and residential mortgage litigation, bank regulatory disputes, and collection actions.

David's representative cases include the representation of Court Appointed Receivers in a \$1.2 billion fraud action brought by the Securities and Exchange Commission in connection with the sale of TIC and other interests in 300 assisted living facilities; and a \$750 million ponzi-like scheme involving the purchase of medical related receivables and related lending transactions; representation of lender in workout of mezzanine financing on a multi-building office park; defense of actions in bankruptcy by junior lienholder and debtor against lender on an industrial park; and structure lease termination and modifications for commercial and retail tenants both in and out of bankruptcy.

David has lectured on matters regarding residential and commercial mortgage litigation and workouts, creditors' rights, construction law, and other real property remedies.

#### **MEMBERSHIPS**

- Financial Lawyers Conference
- · American Bankruptcy Institute
- · Turnaround Management Association

# **ACCOLADES**

 Awarded Turnaround Management Association's Transaction of the Year- Large Turnaround Award (2011)

# **EDUCATION**

David received his B.A. from Stanford University and obtained his J.D. from the University of California, Hastings College of The Law.

#### **BAR ADMISSIONS**

California

# **COURT ADMISSIONS**

- · U.S. District Court, Central District of California
- · U.S. District Court, Eastern District of California
- · U.S. District Court, Northern District of California
- · U.S. District Court, Southern District of California
- . U.S. District Court, District of Arizona
- · California Supreme Court
- . U.S. Ninth Circuit Court of Appeals
- · U.S. Supreme Court

#### REPRESENTATIVE MATTERS

# **Bank Representation**

 Residential and Commercial Bank. Represented a residential and commercial bank in defending several thousand lawsuits throughout California and managed local counsel in 20 Exhibit B - Page 120 other states. The lawsuits concern allegations of mortgage fraud, wrongful foreclosure, violations of TILA, RESPA, HOSPA, and other statutory and regulatory issues.

- **Residential and Commercial Lender.** Represented a residential and commercial lender in the workout and collection of a portfolio of commercial loans exceeding \$1 billion.
- Residential and Commercial Lender. Represented a residential and commercial lender as to the workout and collections of a portfolio of construction loans. Some loans involving completed projects as well as those in progress.

#### Receiverships Cases

- SEC v. Sunwest Management, U.S. District Court, Oregon. Represented the receiver appointed at the request of the SEC for an enterprise involving \$1.2 billion in assets and liabilities. The enterprise involved selling TIC and LLC interest in approximately 300 assisted living facilities.
- SEC v. Medical Capital Holding, U.S. District Court, Central District of California. Represented the receiver appointed at the request of the SEC with regard to ponzi-like scheme which raised over \$1 billion ostensibly to purchase medical receivables.
- SEC v. World Capital Market Inc., et al., U.S. District Court, Central District of California (Western Division). Representing the Receiver in this SEC securities action involving internet based schemes focused on multi level marketing of non existent "cloud" based services.
- SEC v. Steve Chen, USFIA, Inc., et al., U.S. District Court, Central District of California (Western Division). Representing the Receiver appointed at the request of the SEC in connection with a fraudulent scheme involving so called electronic currency as well as other internet based schemes.
- Federal Trade Commission v. Merchant Processing, Inc., et al., U.S. District Court,
  Oregon. Represented the receiver appointed at the request of the FTC in connection with a
  fraudulent scheme involving the sale of credit and debit card merchant account services and
  leasing related equipment. Successfully turned around the enterprise, marshaled assets, and
  operated and liquidated the enterprise returning substantial funds to the victims and FTC.
- U.S. Commodity Futures Trading Commission v. Safevest, LLC, et al., U.S. District
  Court, Central District of California. Represented the receiver appointed jointly by the
  CFTC and the SEC in an action involving an Internet and telemarketing fraud which raised in
  excess of \$25 million purportedly to purchase commodities and futures contracts. This was a
  ponzi scheme in which no trades were made.
- SEC v. Global Online Direct, Inc., U.S. District Court, Northern District of Georgia. Represented the receiver appointed at the request of the SEC for a company raising over \$45 million through the sale of alleged unregistered securities.
- SEC v. Trabulse, et al., U.S. District Court, Northern District of California. Represented the receiver appointed at the request of the SEC for a hedge fund.

#### **EVENTS**

The State Bar of California-Real Property Section - 28th Annual Retreat 5/15/2009

**Speakers:** Thomas W. Henning and David R. Zaro

ABI - Bankruptcy Battleground West Conference

3/13/2009

Speakers: David R. Zaro

# Allen Matkins



PATRICK A PERRY

## **BIOGRAPHY**

Patrick A. Perry is a partner in our Los Angeles office. Patrick's practice focuses primarily on real estate, land use, environmental, natural resources and energy law. He has extensive experience in obtaining zoning and other development approvals, including general plan amendments, specific plans, zone changes, variances, conditional use permits, subdivisions and development agreements. In conducting numerous entitlement due diligence reviews, Patrick has advised buyers, sellers and lenders in connection with the purchase, sale and development of office and industrial buildings, shopping centers, hotels, residential and mixed use projects.

Patrick has extensive knowledge and experience regarding compliance with the requirements of the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA), as well as a wide range of experience addressing issues related to the state and federal Endangered Species Acts, the state and federal Clean Water Acts, the National Historic Preservation Act, state and federal prevailing wage statutes and regulations, and other federal, state, and local statutory and regulatory requirements. He has appeared before or worked closely with the United States Army Corps of Engineers, the United States Fish and Wildlife Service, the California Department of Fish and Wildlife, the California Coastal Commission, the South Coast Air Quality Management District, the California Department of Industrial Relations, the California State Historic Preservation Officer, and multiple local government agencies throughout California. Such work has involved compliance with multi-species habitat conservation plans, Section 404 wetland permits, Section 401 water quality certifications, Section 1602 streambed alteration agreements, Section 10 take permits, Section 2081 take agreements, and other statutes and ordinances, including the Subdivision Map Act, the California Coastal Act, and the Mills Act. Patrick has also represented numerous property owners and developers in connection with lawsuits challenging government approvals or in connection with lawsuits against government interference with private property rights.

Patrick has represented a number of major corporations and entities, including Aeroterm, Art Center College of Design, Azusa Land Partners, Azusa Pacific University, Beacon Capital Partners, Bond Capital, the Chadmar Group, Cornishe of Bighorn, Del Mar Station LLC, Extended Stay America, Fuller Theological Seminary, IKEA, International Cargo Equipment Company, Lafayette Consulting, Lennar Communities, Lodgeworks, L.P., Mattel, Morgan Stanley, RAD Management, the Sares Regis Group, Schomac Group, Tishman Speyer Properties, Tesoro Viejo, Inc., Touchstone Television Productions, TrizecHahn Development, Urban Partners LLC, and the Walt Disney Company.

In addition to being an attorney, Patrick is a licensed architect in the State of California, where he practiced architecture for several years prior to joining the legal profession. He is a LEED-AP. Patrick also serves on the Firm's *Pro Bono* Committee.

# **MEMBERSHIPS**

- · State Bar of California
- Los Angeles County Bar Association
- · American Institute of Architects
- United States Green Building Council

## **EDUCATION**

Patrick received his B.A. from Williams College, his M.A. in architecture at the University of Texas, Austin, and his J.D. from Loyola Law School Los Angeles.

# **BAR ADMISSIONS**

California

# REPRESENTATIVE MATTERS

- Aeroterm USA (Annapolis, Maryland). Represented client in connection with obtaining approvals from Los Angeles World Airports and the City of Ontario for the development of a new air cargo facility at the Ontario International Airport.
- Art Center College of Design (Pasadena, California). Represented client in connection with approval by the City of Pasadena for a new Master Plan for campus development.
   Represented client in negotiations with the City of Pasadena for a long term ground lease for City-owned property.

  Exhibit B Page 122

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- AT&T. Represented client 12960 ction with the negotiation of a multi-carrier agreement with the Rose Bowl Operating Company to install a new state of the art wireless telecommunication system at the Rose Bowl stadium in the City of Pasadena.
- Azusa Land Partners (Newport Beach, California). Conducted due diligence review and
  drafted assignment and assumption agreements and operating memoranda ensuring transfer
  of obligations from seller to buyer for the development of 1,250 new homes on the former
  Monrovia Nursery property in the City of Azusa. Assisted client in connection with litigation
  against the California Department of Industrial Relations regarding application of state
  prevailing wage requirements.
- Azusa Pacific University (Azusa, California). Assisted in obtaining approvals from the City
  of Azusa for a new Specific Plan and Development Agreement for campus expansion.
  Represented client in connection with litigation against the State Historical Resources
  Commission for designation of drive-in movie theater owned by client as eligible for listing on
  the California Register of Historical Resources.
- Beacon Capital Partners (Los Angeles, California). Conducted land use and zoning due
  diligence review in connection with the client's acquisition of the following properties: Union
  Bank Center, Seattle, Washington; 50 Beale Street San Francisco, California; Figueroa Plaza,
  Los Angeles, California; 1000 Wilshire, Los Angeles, California.
- Beverly Wilshire Hotel (Beverly Hills, California). Represented client in connection with limiting scope of historical designation to allow future modification of non-historical elements.
- The Chadmar Group (Santa Monica, California). Assisted residential developer to obtain entitlements from City of Marina for development of 1,050 new homes on former Fort Ord.
- Clear Wireless. Represented client in connection with collocation of wireless telecommunication facilities on existing tower located on property owned by the City of La Mirada
- Cornishe of Bighorn (Ceres, California). Represented client in connection with obtaining approvals for a 38 unit residential condominium development in the City of Palm Desert and in connection with obtaining development approvals from the U.S. Army Corps of Engineers and the California Department of Fish & Game.
- Del Mar Station, LLC. Represented client in connection with the development of a combined light rail transit facility and mixed-use project consisting of a retail, office, and multi-family residential complex.
- Empire Commercial (Ontario, California). Represented client in connection with obtaining approvals for a new multi-tenant retail center in the City of Palmdale.
- Fuller Theological Seminary (Pasadena, California). Represented a private nondenominational theological seminary in connection with its application to the City of Pasadena for approval of a new campus master plan.
- Harvey Mudd College (Claremont, California). Represented client in connection with approval by the City of Claremont of amendment to master plan for campus development. Represented client in connection with the approval of a subdivision and sale of undeveloped parcel for campus expansion.
- IKEA (Carson, California). Represented client in connection with regulatory compliance action before the South Coast Air Quality Management District.
- International Cargo Equipment Company (Los Angeles, California). Successfully
  defended the owner of a cargo container storage facility against criminal misdemeanor
  charges brought by the City of Los Angeles for maintaining a legal nonconforming use in
  Wilmington.
- Lennar Communities (Aliso Viejo, California). Reviewed development approvals by the City of Irvine for the former El Toro Marine Air Station to assist client in successful acquisition of the property.
- Los Angeles Unified School District (Los Angeles, California). Represented school
  district in connection with CEQA compliance for the development of more than 150 new
  school projects.
- Ronald L. Loder (Laguna Beach, California). Represented homeowner in connection with successful appeal to Laguna Beach City Council of denial by Design Review Board for construction of single family home. Defense of client against CEQA suit subsequently filed by neighboring homeowners.
- Mattel, Inc. (El Segundo, California). Represented client in connection with application to the City of El Segundo for a general plan amendment, specific plan, zone change, and development agreement for new world headquarters facilities.
- Missionaries of Charity (Los Angeles, California). Provided pro bono representation of a
  religious order in connection with its application for approval by the City of Los Angeles to
  conduct an ongoing ministry to homeless young adults. Representation of client in connection
  with litigation against the City of Los Angeles for violation of constitutional and statutory rights
  to free exercise of religion.
- North Broadway Ventures, LLC. Represented client in connection with the approval of a

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coastal development permit: and 61 in the City of Malibu.

- RAD Management (Santa Monica, California). Represented client in connection with obtaining approval from the City of Los Angeles for the following projects: 1100 Wilshire adaptive reuse of an existing vacant highrise office tower in downtown Los Angeles for the development of 228 residential condominium units; West L.A. Transportation Facility development of a new state of the art bus maintenance facility for the Metropolitan Transportation Authority in Los Angeles; 100 East Sunset Avenue development of a new 214 unit mixed use project in Los Angeles.
- Rady Children's Hospital (San Diego, California). Represented client in connection with prevailing wage determination by the California Department of Industrial Relations.
- Sares Regis Group (Irvine, California). Conducted due diligence review in connection with the client's acquisition of the Bressi Ranch development in the City of Carlsbad.
- Sares Regis Group (Pasadena, California). Represented client in connection with obtaining approvals for the development of an 820 unit urban mixed use project in the City of Pasadena.
- Sinclair Wind Farms, LLC (Kern County, California). Represented client in connection with the negotiation of leases for development of wind generation facility on undeveloped property located in Kern County.
- Tesoro Viejo, Inc. Successfully defended client against multiple lawsuits brought pursuant to
  the California Environmental Quality Act challenging approval of a new community consisting
  of 190 residential dwelling units and three million square feet of commercial and light industrial
  floor area on undeveloped land in southeast Madera County. Assist client in obtaining
  additional approvals for the project, including vesting tentative subdivision maps and water
  supply agreements.

# **PUBLICATIONS**

#### **PRESS & MEDIA**

09-Mar-2015 5 Things You Need to Know About LA Development

Patrick A. Perry in Bisnow Real Estate Los Angeles

26-Mar-2013 The Future of Century City, Part 2

Patrick A. Perry in Real Estate Bisnow Los Angeles

22-Jan-2013 Kilroy Closes on \$170M Office Buy

Peter J. Roth, Patrick A. Perry, Michael Cerrina, Julie K. Hoffman, Hadar G. Goldstein, and Cheryl S. Prell in

GlobeSt.com

08-May- Fast-Track Rules Set Key Precedent For CEQA Cases

2012 Patrick A. Perry in Law360

03-Feb-2012 Did the Greenest Type of Development Just Become an

**Endangered Species?** 

Patrick A. Perry in The Green Report

01-Apr-2010 Energy Storage in the U.S.

Patrick A. Perry in Sun & Wind Energy

# **VIDEOS**

24-Feb-2012 California Redevelopment Agency Update: The

Implications of the Matosantos Decision

29-Nov-2011 Telecommunications: Everything You Need to Know

About Broadband, Towers & Land Use Issues

12-Aug-2011 New Budget Calls for Reallocation of Local

Redevelopment Revenue Back to the General Fund

# **ARTICLES**

01-Nov- Interest in Los Angeles CleanTech Corridor Revived with

2010 DRA REP

# Case 5:15-cv-02387-SVW-KK Document 79-2 Filed 06/03/16 Page 12 of 20 Page ID

By Patrick A. Perry and Emily L. Murray in *Urban Land*Institute

04-Apr-2010 Renewable Energy has Benefitted, but Stumbling Blocks

Still Exist

By Patrick A. Perry in Exploration-Processing.com

#### **LEGAL ALERTS**

02-Mar-2015 Berkeley Hillside: New Supreme Court decision defines

limits of CEQA exemption challenges to development

11-Aug-2014 The California Supreme Court Further Limits the Scope of

CEQA Review for Voter-Sponsored Initiatives in Tuolumne Jobs & Small Business Alliance v. Superior

Court

06-Jul-2012 California Supreme Court Rules that Prevailing Wage

Laws Do Not Apply to Charter Cities

29-Jul-2009 Court of Appeal Holds that Inclusionary Housing

Requirements Violate the Costa-Hawkins Rental Housing

Act

In this Alert, we discuss the implications of Palmer/Sixth Street Properties v. City of Los Angeles, which will affect inclusionary housing requirements for rental properties.

# **EVENTS**

Bisnow's Construction & Development and the Battle of Prop 13

3/5/2015

Speakers: Patrick A. Perry

Bisnow Future of Century City

3/20/2013

Speakers: Patrick A. Perry

Redevelopment Overview and Demise of Redevelopment Agencies

3/28/2012

Speakers: Patrick A. Perry

Redevelopment Briefing - Los Angeles

2/8/2012

Speakers: Patrick A. Perry and Emily L. Murray

BIA San Diego - Prevailing Wages - Did a Recent Court Case Just Increase the Cost of Your

**Private Project** 

2/17/2011

Speakers: Jeffrey A. Chine and Patrick A. Perry

Sustainability Series: Solar Leadership Roundtable

10/5/2010

Speakers: Patrick A. Perry

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7/12/2010 #:1963

Speakers: Emily L. Murray and Patrick A. Perry

Multifamily Affordable Housing Briefing - Los Angeles

1/21/2010

Speakers: John C. Condas, Patrick A. Perry and Sonia J. Ransom

Solar Energy Financing

4/28/2009

Speakers: Paul V. Obico and Patrick A. Perry





Kenyon D. Harbison practices in the areas of real estate, insurance, and general corporate-related litigation, including litigation in bankruptcy courts. He has worked in all phases of litigation, from initial pleadings through discovery, trial, and appeal in state, federal, and federal bankruptcy court proceedings. His cases have related to commercial lease disputes, insurance recovery, soil contamination, construction defect litigation, and partnership disputes, among other subjects.

Kenyon has extensive understanding of the federal Truth in Lending Act, the Real Estate Settlement Procedures Act, FDIC regulations, the federal Fair Credit Reporting Act, the federal Fair Debt Collection Practices Act and the California Rosenthal Act, foreclosure litigation pursuant to California Civil Code section 2924 et seq., all major areas of fundamental California common law, the California Insurance Code, and litigation in federal bankruptcy adversary proceedings.

#### **MEMBERSHIPS**

• State Bar of California, Real Property Law Section

#### **COMMUNITY ACTIVITIES**

Kenyon serves on the Board of Directors of the West Pasadena Residents' Association. Founded in 1962, the WPRA is dedicated to maintaining and enhancing the character of the community and quality of life in West Pasadena. It informs residents of current issues, and represents the interest of the residents in discussions with the City of Pasadena and with other entities and stakeholders.

#### **EDUCATION**

Kenyon received his B.A. in English literature, with distinction in his major, from Yale University in 2000, before which he was a United States Presidential Scholar from Montana. Kenyon received his J.D. from UCLA School of Law.

At UCLA School of Law, Kenyon was a staff member and a managing editor of the *UCLA Law Review*, was chosen as a student instructor of legal writing, and was made a member of The Order of the Coif. He also served as a research assistant to Professor Joanna Schwartz and he externed for the Honorable Paul Boland of the California Court of Appeal, Second District.

After practicing law at Allen Matkins for nearly a year, Kenyon took a leave of absence and clerked for the Honorable Florence-Marie Cooper of the U.S. District Court, Central District of California, after which he returned to Allen Matkins.

# **BAR ADMISSIONS**

California

# **COURT ADMISSIONS**

- All California state courts
- U.S. District Court, Northern District of California
- · U.S. District Court, Eastern District of California
- · U.S. District Court, Central District of California
- . U.S. District Court, Southern District of California
- Ninth Circuit Court of Appeals

# **EVENTS**

IMN West Coast Real Estate General Counsel Forum

5/5/2014

Speakers: Mark R. Hartney, Fernando Villa and Kenyon D. Harbison

# **PUBLICATIONS**

# **ARTICLES**

01-Dec- What Flagstar Bank Can Teach Mortgage Servicers and

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2014 Others About the 1965

By Joshua A. del Castillo and Kenyon D. Harbison in

California Mortgage Finance News

27-May- Update on Evolving California Homeowner's Bill of Rights

2014 Case Law

By Joshua A. del Castillo and Kenyon Harbison in

California Mortgage Finance News

01-Jul-2013 Adverse Action Notices in a Fluid Regulatory

**Environment** 

By Joshua A. del Castillo and Kenyon Harbison in CMBA

Legal News

27-Mar-2013 Reader Alert - New Truth in Lending Rules Are

Shadowed in Doubt

By Kenyon Harbison in State Bar of California Real

Property Law Section E-Bulletin

23-Jul-2012 Coke vs. SodaStream: are there trademarks in trash?

By Kenyon Harbison in Daily Journal

23-Jun-2010 Respecting Foreclosure: Section 2923.5 Remedies

Clarified

By Joshua A. del Castillo and Kenyon D. Harbison in Los

Angeles Daily Journal

01-Apr-2008 Are Contingent Fee Attorneys Deterred? How Courts

Can More Effectively Police Adhesive Arbitration

Agreements

By Kenyon D. Harbison in Appalachian Journal of Law

# **VIDEOS**

08-Jan-2013 The FCRA, ECOA and the Consumer Financial

Protection Bureau: Two Areas of Ambiguity the Bureau

May Address





TIM C. HSU

Tim C. Hsu is an associate in the firm's Los Angeles office, where he is a member of the firm's Restructuring, Insolvency and Bankruptcy Practice Group, the Environmental and Natural Resources Practice Group, as well as the Receiverships, Lenders and Special Creditor Remedies Practice Group. Tim's practice includes general commercial litigation, including lender and financial services litigation, environmental claims litigation brought under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), and federal and state receivership matters. He has worked in all phases of state and federal litigation, from initial pleadings through discovery and trial, including defending subsequent appeals in state court proceedings. In addition to his litigation practice, Tim also has experience representing lenders in financial transactions, including secured credit transactions.

Prior to joining Allen Matkins, Tim served as a Judicial Extern for the Honorable Ernest M. Robles in the United States Bankruptcy Court, Central District of California. He has also served as a Judicial Extern for Magistrate Judge Oswald Parada in the United States District Court, Central District of California, where he reviewed and analyzed statutes, regulations, and case law addressing substantive and procedural issues arising in civil rights, habeas corpus, and Social Security Administration benefits appeals matters.

Tim is also a licensed Certified Public Accountant in California and has previously worked for a number of years as a senior financial statement auditor with PricewaterhouseCoopers, LLP, and was an assistant fund controller at the Capital Group Companies. He is fluent in Mandarin Chinese and conversational in Cantonese.

#### **EDUCATION**

Tim received his J.D. from Loyola Law School Los Angeles and his B.S. in accounting from the University of Southern California, Leventhal School of Accounting.

# **PUBLICATIONS**

## **LEGAL ALERTS**

21-Dec- Evolving Home-Sharing Market Prompts a Variety of

2015 Local Regulations

23-Jun-2015 Mutual Water Companies: A Water Supply Option for

Multifamily and Residential Developments

11-Aug-2014 The California Supreme Court Further Limits the Scope of

CEQA Review for Voter-Sponsored Initiatives in

Tuolumne Jobs & Small Business Alliance v. Superior

Court

22-Aug-2013 EPA Endorses New ASTM Phase I Standard

16-Apr-2013 New California Court of Appeal Decision May Affect

Administration of Foreclosure-Avoidance Actions

## **ARTICLES**

15-Dec- The Evolving Home-Sharing Market Prompts a Variety of

2015 Local Regulations

By Joshua A. del Castillo, Tim C. Hsu and Timothy M.

Hutter in Western Real Estate Business

30-Jun-2015 Alternative water supply options for some development

by Courtney A. Davis and Tim C. Hsu in Daily Journal

01-Sep-2013 California Foreclosure Proceedings: Recent court

decisions may illustrate trends in foreclosure-avoidance

# 

By Joshua A. del Castillo and Tim C. Hsu in *Scotsman Guide* Residential Edition





MELISSA K. ZONNE

Melissa K. Zonne is a litigation associate in our Los Angeles office. She practices commercial and business litigation, with an emphasis on labor and employment, real estate, receiverships, and construction. As part of her work in the Labor & Employment Practice Group, Melissa has assisted in successfully defending against matters involving a variety of discrimination claims and wage and hour violations, including class actions. Melissa has experience in motion preparation and drafting, as well as experience drafting briefs on the appellate level. She also has experience in civil discovery, including depositions, written discovery and resolution of discovery disputes.

#### **EDUCATION**

Melissa received her B.A. in public relations, with a minor in business administration, from University of Southern California. She received her J.D. from the University of Southern California Gould School of Law. While in law school, Melissa was the Chair of the Hale Moot Court Honors Program.

Melissa was previously a summer associate at Allen Matkins.

## **BAR ADMISSIONS**

California





MAXWELL B. SHAPIRO

Maxwell B. Shapiro is an associate in the firm's Los Angeles office, practicing in the Real Estate and Commercial Finance Practice Groups. His practice focuses on acquisitions and dispositions, leasing, real estate financing and commercial finance.

Prior to joining Allen Matkins, Max participated in the firm's summer associate program. He also was a Judicial Extern for the Honorable Berle M. Schiller, United States District Court, Eastern District of Pennsylvania.

## **MEMBERSHIPS**

• Urban Land Institute

# **EDUCATION**

Max received his J.D. from Loyola Law School and his B.A. from the University of Pennsylvania. He was in the St. Thomas More honor society and was a Production Editor on the *International and Comparative Law Review*, where he published the article, "A Wild Goose Chase: California's Attempt to Regulate Morality by Banning the Sale of One Food Product." (35 Loy. L.A. Int'l & Comp. L. Rev. 27, 2012).

# **BAR ADMISSIONS**

California





Richard J. Miltimore is a senior counsel in the San Diego office of Allen Matkins. He represents private sector clients, including property developers, owners, and financial institutions. Rick has experience in a broad range of transactional project finance and real estate transactions, including secured lending, commercial leasing, project development, real estate joint venture and equity fund formation and investments, and real estate property acquisitions and dispositions. Rick's experience also includes representing both landlords and tenants on a variety of leasing matters, including negotiating leases for office space, bio-medical laboratory space, medical office buildings and data centers, as well as build-to-suit construction leases and ground leases.

Rick's recent transactions include representing a real estate fund in connection with a multi-billion dollar joint venture to acquire a portfolio of dozens of residential apartment communities across the United States in a single transaction, as well as a similar transaction that closed in multiple stages.

Prior to joining Allen Matkins, Rick was a project finance and real estate associate at Latham & Watkins LLP.

### **EDUCATION**

Rick received his B.A. in Political Science from Pepperdine University. He received his J.D. from Northwestern University School of Law in Chicago, where he was on the Dean's List for Fall 2004, Spring 2005, Fall 2005, Fall 2006 and Spring 2007.

#### **BAR ADMISSIONS**

- California
- Illinois
- New York

# **EVENTS**

ULI Economic Outlook for 2016

2/22/2016

Speakers: Richard J. Miltimore

San Diego State of the Market

1/12/2016

Speakers: Richard J. Miltimore

# **PUBLICATIONS**

# **PRESS & MEDIA**

21-Mar-2016 Industry experts give outlook on real estate

Richard J. Miltimore in The Daily Transcript

19-Jan-2016 What The Evolving Work Environment Means For The

San Diego Office Market

Richard Miltimore in Bisnow San Diego

PROOF OF SERVICE 1 Securities and Exchange Commission v. Robert Yang, Suncor Fontana, et al. 2 USDC, Central District of California - Case No. 5:15-cv-02387-SVW (KKx) 3 I am employed in the County of Los Angeles, State of California. I am over 4 the age of 18 and not a party to the within action. My business address is 515 S. Figueroa Street, 9th Floor, Los Angeles, California 90071-3398. 5 6 A true and correct copy of the foregoing document(s) described below will be served in the manner indicated below: 7 FIRST INTERIM APPLICATION FOR PAYMENT OF FEES AND 8 REIMBURSEMENT OF EXPENSES OF RECEIVER'S COUNSEL, 9 ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP 10 TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC 1. **FILING** ("NEF") – the above-described document will be served by the Court 11 via NEF. On June 3, 2016, I reviewed the CM/ECF Mailing Info For A Case 12 for this case and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated 13 below: 14 • Zachary T. Carlyle 15 carlylez@sec.gov,kasperg@sec.gov,karpeli@sec.gov, blomgrene@sec.gov,pinkstonm@sec.gov,NesvigN@sec.gov 16 • Stephen J. Donell 17 idelcastillo@allenmatkins.com • Mark T. Hiraide 18 mhiraide@hiraidelaw.com,kju@phlcorplaw.com, 19 hitabashi@phlcorplaw.com,eganous@phlcorplaw.com 20 • Leslie J. Hughes hughesLJ@sec.gov,kasperg@sec.gov,pinkstonm@sec.gov, 21 nesvign@sec.gov 22 • George D. Straggas George.straggas@straggasdean.com;sarah.borghese@straggasdean.com, 23 eric.dean@straggasdean.com 24 David J. Van Havermaat 25 vanhavermaatd@sec.gov,larofiling@sec.gov,berryj@sec.vog, irwinma@sec.gov 26 Joshua Andrew del Castillo 27 jdelcastillo@allenmatkins.com 28

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1	David R Zaro
2	dzaro@allenmatkins.com
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4	2. <u>SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served)</u> : On, I served the following person(s)
5	and/or entity(ies) in this case by placing a true and correct copy thereof in a
6	sealed envelope(s) addressed as indicated below. I am readily familiar with
7	this firm's practice of collection and processing correspondence for mailing. Under that practice it is deposited with the U.S. postal service on that same day
8	in the ordinary course of business. I am aware that on motion for party served,
9	service is presumed invalid if postal cancellation date or postage meter date is more than 1 (one) day after date of deposit for mailing in affidavit.
10	
11	I declare that I am employed in the office of a member of the Bar of this Court
12	at whose direction the service was made. I declare under penalty of perjury under the
13	laws of the United States of America that the foregoing is true and correct. Executed on <b>June 3, 2016</b> at Los Angeles, California.
13	on <u>June 3, 2010</u> at Los Angeles, Camorina.
15	s/ Martha Díaz Martha Diaz
	Martha Diaz
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