1 2 3 4 5 6 7 8	DAVID R. ZARO (BAR NO. 124334) E-Mail: dzaro@allenmatkins.com MATTHEW D. PHAM (BAR NO. 28770 E-Mail: mpham@allenmatkins.com ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP 865 South Figueroa Street, Suite 2800 Los Angeles, California 90017-2543 Phone: (213) 622-5555 Fax: (213) 620-8816  EDWARD G. FATES (BAR NO. 227809 E-Mail: tfates@allenmatkins.com ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP One America Plaza	
9 10	600 West Broadway, 27th Floor San Diego, California 92101-0903 Phone: (619) 233-1155	
11	Fax: (619) 233-1158  Attorneys for Court-Appointed Receiver	
12	KRISTĂ L. FREITAG	
13	UNITED STATES	DISTRICT COURT
14	CENTRAL DISTRIC	CT OF CALIFORNIA
15		
16	SECURITIES AND EXCHANGE COMMISSION,	Case No. 8:23-cv-00855-JWH-KES
17 18	Plaintiff,	FIFTH INTERIM FEE APPLICATION OF ALLEN MATKINS LECK GAMBLE
	VS.	MALLORY & NATSIS LLP,
19	INTEGRATED NATIONAL	GENERAL COUNSEL TO THE RECEIVER, KRISTA L. FREITAG,
20	RESOURCES, INC. dba WEEDGENICS, ROLF MAX	FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES
21	HIRSCHMANN aka "MAX BERGMANN," PATRICK EARL WILLIAMS,	Date: January 24, 2025
<ul><li>22</li><li>23</li></ul>	Defendants, and	Time: 9:00 a.m. Ctrm: 9D
24	WEST COAST DEVELOPMENT LLC,	Judge: Hon. John W. Holcomb
25	INR CONSULTING LLC (WYOMING ENTITY), OCEANS 19 INC.,	
26	AUTOBÁHN PERFORMANCE LLC, ONE CLICK GENERAL MEDIA INC.,	
27	OPUS COLLECTIVE, JOHN ERIC FRANCOM, INR-CA INVESTMENT	
28	HOLDINGS, LLC, MICHAEL DELGADO, TOTAL SOLUTION CONSTRUCTION LLC. BAGPIPE	
	1	

LAW OFFICES

Allen Matkins Leck Gamble
Mallory & Natsis LLP

HOLDINGS LLC, BAGPIPE MULTIMEDIA LLC, TYLER CAMPBELL, INR CONSULTING LLC (CALIFORNIA ENTITY), HIDDEN SPRINGS HOLDINGS GROUP LLC, and ALEXANDRIA PORTER BOVEE aka "AIA MONTGOMERY", Relief Defendants. 

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Mallory & Natsis LLP

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Gamble LLP		

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1	TABLE OF AUTHORITIES
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5	<i>In re Imperial 400 Nat'l, Inc.</i> , 432 F.2d 232 (3d Cir. 1970)
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Gamble LLP	
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LAW OFFICES Allen Matkins Leck C Mallory & Natsis

1 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), general counsel to Krista L. Freitag (the "Receiver"), the Court-appointed receiver for Defendant Integrated National Resources, Inc., dba Weedgenics ("INR"), and 3 Relief Defendants West Coast Development LLC, INR Consulting LLC (Wyoming 4 Entity), Oceans 19 Inc., Autobahn Performance LLC, One Click General Media 5 Inc., Opus Collective, INR-CA Investment Holdings, LLC, Total Solution 6 Construction LLC, Bagpipe Holdings LLC, Bagpipe Multimedia LLC, INR 7 Consulting LLC (California Entity), and Hidden Springs Holdings Group LLC, and 8 their subsidiaries and affiliates (collectively the "Receivership Entities"), hereby submits this Fifth Interim Application for Payment of Fees and Reimbursement of 10 Expenses (the "Application"). This Application covers the period from April 1, 11 2024 through June 30, 2024 (the "Application Period"), and seeks approval of 12 \$138,112.65 in fees and \$14,151.13 in expenses, and an order authorizing the 13 Receiver to pay, on an interim basis, 80% of the fees incurred (\$110,490.12) and 14 100% of the expenses incurred (\$14,151.13). 15 16 I.

# **INTRODUCTION.**

This equity receivership involves a large, complex, and wide-ranging group of enterprises and assets associated with the alleged \$61 million fraudulent scheme that is the subject of the Complaint filed by the Securities and Exchange Commission (the "Commission"). The Receiver was appointed on a temporary basis by the Temporary Restraining Order entered on May 19, 2023 ("TRO"), and on a permanent basis on June 2, 2023, pursuant to the Preliminary Injunction Order with Respect to Certain Defendants and Relief Defendants and Orders (1) Freezing Assets; (2) Appointing a Permanent Receiver; (3) Requiring Accountings; and (4) Prohibiting the Destruction of Documents (Dkt. 33) and subsequent Preliminary Injunction Orders entered between June 8, 2023 and June 29, 2023 (Dkt. 48, 49, 93 95) (the "Appointment Order").

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1	The Appointment Order confers broad duties, responsibilities, and powers
2	upon the Receiver, which are designed to allow her to secure, preserve, and protect
3	the assets of the Receivership Entities, conduct a forensic accounting and analysis of
4	the Receivership Entities' financial transactions, investigate and recover sums
5	transferred to third parties, review and analyze investor and creditor claims, and
6	maximize the amount ultimately available for distribution to investors and creditors.
7	The Receiver promptly determined that experienced and qualified counsel was
8	critical to the performance of her duties and obligations under the Appointment
9	Order due to the size and complexity of the receivership estate. Accordingly, the
10	Receiver engaged Allen Matkins to assist with legal issues facing the receivership
11	estate and the firm immediately began work, including assisting with the takeover of
12	the enterprises and securing their assets. The Court approved the Receiver's
13	engagement of Allen Matkins on July 28, 2023. Dkt. 125.
14	This Application should be read in conjunction with the Receiver's Sixth
15	Interim Report and Recommendations ("Fifth Report") filed on August 2, 2024
16	(Dkt. 267), which describes in detail the Receiver's activities during the Application
17	Period.
18	This Application seeks approval of \$138,112.65 in fees for a total of 203.70

This Application seeks approval of \$138,112.65 in fees for a total of 203.70 hours worked, and payment on an interim basis of 80% of that amount, or \$110,490.12. Allen Matkins has agreed to discount its standard hourly rates by 10% for this case. The work performed is described task-by-task in  $Exhibit A^1$  and is broken down into the following categories:

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While Allen Matkins has made efforts to ensure that its billing entries are consistent across categories, certain activities lend themselves to more than one category, or may be difficult to categorize. In any event, Exhibit A reflects the actual time spent by Allen Matkins personnel, and contains accurate descriptions of the services rendered.

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Category Hours **Amount** General Receivership 26.30 \$17,487.45 Asset Investigation & Recovery 150.00 \$101,781.00 2.30 Reporting \$1,562.85 Operations & Asset Sales 15.90 \$10,947.15 Claims & Distributions 3.00 \$2,065.50 Third Party Recoveries 4.90 \$3,373.65 0.20 Pending Litigation \$137.70 Employment/Fees 1.10 \$757.35 **Total Fees** 203.70 \$138,112.65

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Allen Matkins has worked diligently and efficiently to assist the Receiver with legal issues facing the receivership estate. The Firm's work has allowed the Receiver to preserve and protect the substantial value of receivership estate assets. Because the firm has worked diligently and efficiently to assist the Receiver in carrying out her Court-ordered duties, it should be compensated on an interim basis for its work.

# II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED.

# A. Categories and Descriptions of Work.

# 1. General Receivership.

Services in this category relate to assisting the Receiver with matters relating to the general administration of the receivership estate and the underlying litigation. This work included analyzing and advising the Receiver on issues relating to (a) the consents to entry of judgments as to the Receivership Entities that the Receiver signed and the SEC filed, (b) the dismissal of Relief Defendant Eric Francom from the case, and (c) discussions about a potential settlement involving Relief Defendant Alexandria Montgomery. The firm also analyzed and advised the Receiver regarding the Corporate Transparency Act, filing requirements for the Receivership Entities, and handled communications with counsel for the parties regarding

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information needed for such filings. The reasonable and necessary fees for Allen Matkins' work in this category total \$17,487.45.

#### 2. **Asset Investigation & Recovery.**

The substantial services in this category relate generally to efforts to investigate, identify, secure, preserve, and recover Receivership Entity assets. Investigation-related tasks comprised the largest category of Allen Matkins' work during the Application Period. The tasks performed include the following:

- Identifying subpoena targets and issuing subpoenas to financial institutions, vendors, website/domain hosting companies, escrow companies, telecom carriers, recipients of potential receivership assets, and others involved with or otherwise connected to the Receivership Entities or their assets in some manner;
- Issuing demand and asset turnover letters to recipients believed to be in possession of receivership assets in order to enable the Receiver to recover and gain control over the Assets;
- Issuing document preservation letters to recipients believed to be in possession of the Receivership Entities' books and records;
- Gathering, organizing, and reviewing documents and information obtained from third parties including, but not limited to, banking and other financial records, investment records, asset-related purchase and sale documents, legal files, and investor communications;
- Analyzing investor transactions and associated documentation in order to develop a better understanding of the nature and scope of the fraudulent scheme; and
- Addressing discovery disputes, including assertions of attorney-client privilege and privacy rights in connection with various third-party subpoenas.

Allen Matkins devoted considerable time to gathering and analyzing documents from third parties and interviewing witnesses for the purpose of evaluating potential claims to recover funds on behalf of the receivership estate. The investigation and analysis has focused on, among other things, tours given by Defendant Hirschmann to prospective investors in the Ponzi scheme at a cannabis facility located in Las Vegas (not owned or operated by the Defendants or Relief Defendants) and the circumstances in which those tours were allowed to take place. These tours were critical to the growth of the Ponzi scheme (investors saw the facility first hand and were lead to believe it was owned and operated by INR) and have taken time to investigative due to the systematic destruction of emails and text messages by persons associated with the scheme and the fact that the owner of the cannabis facility has, thus far, denied having any contact with Hirschmann or any other persons associated with the scheme.

The investigation has also focused on the law firms that represented INR and assisted the Defendants and Relief Defendants who were operating the Ponzi scheme. Allen Matkins' investigative work also included planning and preparing for depositions that took place in August and September 2024 (with additional depositions planned for October 2024).

Through these efforts, along with her forensic accounting, the Receiver has identified various third parties against whom she plans to pursue claims (including fraudulent transfer claims and potentially others) to recover funds for distribution to investors with losses from the Ponzi scheme. The Court has authorized the Receiver to pursue fraudulent transfer claims and to settle such claims within certain preapproved parameters. Dkt. 218. The Receiver has already successfully settled one such claim without litigation.

Allen Matkins also assisted the Receiver in addressing issues with the Gracemoor Property, including (a) a claim by the homeowners' association ("HOA") that certain construction at the property was not approved by the HOA,

and (b) a lien recorded against the property by a vendor of security screens that was not fully paid for a pre-receivership purchase order.

The reasonable and necessary fees for Allen Matkins' work in this category total \$101,781.00.

### 3. Reporting.

Allen Matkins' services in this category were focused on preparing the Receiver's Fifth Interim Report and Recommendations, which was filed on May 17, 2024. Dkt. 233. The reasonable and necessary fees for Allen Matkins' work in this category total \$1,562.85.

### 4. Operations & Asset Sales.

Allen Matkins' services in this category were focused on advising the Receiver regarding issues relating to the prospective sale of real properties, including engaging brokers, listing properties, and related issues. The firm also advised on issues relating to the prospective sales of automobiles and the potential sale of the remaining Rari Nutrition assets. The reasonable and necessary fees for Allen Matkins' work in this category total \$10,947.15.

#### 5. <u>Claims & Distributions.</u>

Services rendered in this category generally relate to the claims and interests of investors and creditors of the Receivership Entities. Allen Matkins assisted with issues related to disseminating information about the receivership to investor and creditors, including notification letters, and information provided on the receivership website (<a href="www.inrreceivership.com">www.inrreceivership.com</a>). The firm also assisted in responding to direct inquiries from investors and creditors. Finally, the firm assisted the Receiver in analyzing and addressing the claim for fines asserted by the HOA for the Gracemoor property. The reasonable and necessary fees for Allen Matkins' work in this category total \$4,681.80.

## 6. Third Party Recoveries

Allen Matkins' work in this category focused on pursuing and settling two clawback claims (once such claims had been authorized by the Court), which produced a recovery of \$94,000 (part of which is being paid over time in installments). The reasonable and necessary fees for Allen Matkins' work in this category total \$3,373.35.

# 7. **Pending Litigation**

Allen Matkins' work in this category focused on a notice from the American Arbitration Association concerning a stayed, pre-receivership case. The reasonable and necessary fees for Allen Matkins' work in this category total \$137.70.

# 8. <u>Employment/Fees.</u>

Neither the Receiver nor Allen Matkins charge for preparing their own detailed fee applications. Allen Matkins assisted in preparing the Receiver's third interim fee application and in meeting and conferring with counsel for the Securities and Exchange Commission before the third interim fee applications were filed. The reasonable and necessary fees for Allen Matkins' work in this category total \$757.35.

# A. Summary of Expenses Requested for Reimbursement.

Allen Matkins requests that the Court approve reimbursement of \$14,151.13 in out-of-pocket costs. The itemization of such expenses is summarized below by billing category. The majority of the expenses incurred relate to the issuance and service of subpoenas. As explained above, Allen Matkins issued subpoenas and gathered documents from many third parties and financial institutions. Each of these subpoenas required proper service.

The total for costs incurred by Allen Matkins during the Application Period is \$14,151.13 and is broken down by category as follows:

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Category	Total
E-Discovery	\$1,276.38
Depositions	\$3,235.80
Service of Process	\$7,226.80
Research (including PACER)	\$20.20
Document Production	\$1,201.95
Investigation	\$1,190.00
<b>Total Fees</b>	\$14,151.13

# III. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE ALLOWED.

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

In allowing fees, a court should consider "the time, labor and skill required, but not necessarily that actually expended, in the proper performance of the duties imposed by the court upon the receiver . . . , the fair value of such time, labor and skill measured by conservative business standards, the degree of activity, integrity and dispatch with which the work is conducted and the result obtained." *United States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted). In practical terms, receiver and professional compensation thus ultimately rests upon the result of an equitable, multi-factor balancing test involving the "economy of administration, the burden that the estate may be able to bear, the amount of time required, although not necessarily expended, and the overall value of the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d 232, 237 (3d Cir.

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1970). Regardless of how this balancing test is formulated, no single factor is determinative and "a reasonable fee is based [upon] all circumstances surrounding the receivership." SEC v. W.L. Moody & Co., Bankers (Unincorporated), 374 F. Supp. 465, 480 (S.D. Tex. 1974).

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

As previously noted, the Receiver promptly determined that utilizing a few third-party vendors and her experienced staff at E3 as well as experienced, qualified counsel was critical due to the lack of records, size and complexity of the receivership estate. The Receiver sought approval and the Court approved her engagement of Allen Matkins and the ability to file interim reports and fee applications on a quarterly basis via the Order Regarding Aid of Receivership. Dkt. 60, 125.

Allen Matkins has submitted a detailed fee application which describes the nature of the services rendered. See Exhibit A. Allen Matkins has endeavored to staff matters as efficiently as possible while remaining cognizant of the complexity of issues presented. As noted above, the request for fees is based on Allen Matkins' customary billing rates charged for comparable services provided in other matters, less a 10% discount. Moreover, Allen Matkins wrote off and did not charge for 6.40 hours of work (\$3,712.50 in fees).

The work performed by Allen Matkins was essential to carrying out the Receiver's Court-ordered duties. The Receiver and Allen Matkins have worked diligently since the Receiver's appointment to preserve and protect the assets of the

1	receivership estate, maximize the funds available for ultimate distribution to
2	investors, and carry out the Receiver's other duties pursuant to the Appointment
3	Order. Moreover, Allen Matkins seeks payment of only 80% of fees incurred on an
4	interim basis in recognition of the fact that its work in assisting the Receiver is
5	ongoing. Payment of the proposed 20% holdback will be sought at the conclusion
6	of the receivership. Allen Matkins' fees are fair and reasonable and should be
7	approved and paid on an interim basis.
8	IV. <u>CONCLUSION.</u>
9	Allen Matkins therefore respectfully request that this Court enter an Order:
10	1. Approving Allen Matkins' fees of \$138,112.65;
11	2. Authorizing and directing the Receiver to pay 80% of approved fees, or
12	\$110,490.12, from the assets of the Receivership Entities;
13	3. Approving Allen Matkins' costs in the amount of \$14,151.13, and
14	authorizing and directing the Receiver to reimburse such costs in full; and
15	4. For such other and further relief as the Court deems appropriate.
16	
17	Dated: December, 17, 2024 ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP
18	By:/s/Edward G. Fates
19	EDWARD G. FATES Attorneys for Court-Appointed
20	Receiver KRISTA L. FREITAG
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LAW OFFICES

Allen Matkins Leck Gamble
Mallory & Natsis LLP

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# **EXHIBIT A**

#### Case 8:23-cv-00855-JWH-KES Document 297 Filed 12/17/24 Page 16 of 66 Page ID #:5267

07/26/24 17:29:43 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

#### Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward

Matter #: 393983.00002

Client Name: Krista Freitag, as Receiver for Integrat

(Ted) Date of Last Billing: 04/11/24

Matter Name: General Receivership

Proforma Number: 1284932

Client Matter Number:

Client/Matter Joint Group # 393983.1

Fees for I	Fees for Matter 393983.00002.(General Receivership)									
<b>Trans Date</b> 04/09/24	<b>Index</b> 9579994	Description of Service Rendered Communications with SEC counsel and counsel for parties re: settlement conference with Magistrate Judge	<b>Timekeeper</b> Fates, Edward (Ted)	<b>Hours</b> 0.30	<b>Fees</b> 206.55	<b>Sum</b> 206.55	WO	<b>Circle</b> HD	Action TR	
04/09/24	9584779	Email correspondence with parties and their counsel regarding postponement of depositions of Qualcan, Murchison, and Ryan Flanagan (0.2); Virtually meet with Krista Freitag and Ted Fates regarding case updates and outstanding tasks (1.1)	Pham, Matt D.	1.30	625.95	832.50	WO	HD	TR	
04/15/24	9585397	Attend deposition of A. Bovee / Montgomery taken by SEC counsel (3.2) discuss same with Receiver (.9)	Fates, Edward (Ted)	4.10	2,822.85	3,655.35	WO	HD	TR	—
04/16/24	9604433	Attend deposition of R. Hirschmann taken by SEC counsel (1.8) discuss same with Receiver (.3)	Fates, Edward (Ted)	2.10	1,445.85	5,101.20	WO	HD	TR	
04/17/24	9588965	Communications with counsel for parties relating to Hirschmann ex parte application to extend discovery cutoff date	Fates, Edward (Ted)	0.30	206.55	5,307.75	WO	HD	TR	
04/17/24	9589133	Call/emails with SEC counsel re: issues relating to upcoming summary judgment	Fates, Edward (Ted)	2.20	1,514.70	6,822.45	WO	HD	TR	

07/26/24 17:29:43 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

#### Fees for Matter 393983.00002.(General Receivership)

Trans									
Date	Index	Description of Service Rendered motion and settlement conference	Timekeeper	Hours	Fees	Sum		Circle	Action
04/18/24	9590574	Communications with SEC counsel regarding consent to bifurcated judgment against entities in receivership (.4) analyze ex parte application filed by Hirschmann, supporting declaration and order from court regarding briefing (.5)	Fates, Edward (Ted)	0.90	619.65	7,442.10	WO	HD	TR
04/23/24	9596455	Analyze SEC opposition to Hirschmann ex parte application to extend discovery cutoff	Fates, Edward (Ted)	0.40	275.40	7,717.50	WO	HD	TR
04/24/24	9598630	Analyze proposed consent to judgment and form of judgment against INR from SEC counsel (.9) discuss same with Receiver (.7)	Fates, Edward (Ted)	1.60	1,101.60	8,819.10	WO	HD	TR
04/26/24	9599301	Call with Receiver and SEC counsel regarding consent to bifurcated judgment against INR and Receiver declaration re: motion for summary judgment	Fates, Edward (Ted)	0.90	619.65	9,438.75	WO	HD	TR
04/26/24	9602308	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	1.00	337.50	9,776.25	WO	HD	TR
04/29/24	9601233	Analyze order extending discovery per Hirschmann request, advise Receiver re: same	Fates, Edward (Ted)	0.20	137.70	9,913.95	WO	HD	TR
04/30/24	9604272	Communications with court clerk and counsel for parties regarding scheduling issues, deadlines and settlement conference	Fates, Edward (Ted)	0.20	137.70	10,051.65	WO	HD	TR

07/26/24 17:29:43 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

Fees for Matter 393983.00002.(General Receivership)										
<b>Trans Date</b> 05/08/24	<b>Index</b> 9615270	Description of Service Rendered Analyze written discovery requests issued by counsel for Hirschmann to SEC relating to August 2023 meeting with P. Williams	<b>Timekeeper</b> Fates, Edward (Ted)	<b>Hours</b> 0.30	<b>Fees</b> 206.55	<b>Sum</b> 10,258.20	WO	<b>Circle</b> HD	<b>Action</b> TR	
05/09/24	9616566	Review SEC proposed stipulation to adjust pretrial and trial dates (.2) communications with counsel for parties re: same (.1) analyze revised consent and judgment documents for receivership entities from SEC counsel and advise Receiver re: same (.6)	Fates, Edward (Ted)	0.90	619.65	10,877.85	WO	HD	TR	
05/14/24	9622444	Communications with Receiver re: proposed bifurcated consent to judgment for entities in receivership (.3) communications with counsel for SEC re: same (.2)	Fates, Edward (Ted)	0.50	344.25	11,222.10	WO	HD	TR	
05/16/24	9624375	Meet with A. Herren to execute bifurcated consent documents (.4) communications with SEC counsel re: same (.1)	Fates, Edward (Ted)	0.50	344.25	11,566.35	WO	HD	TR	
05/20/24	9628791	Analyze Court-approved bifurcated judgments as to INR and relief defendants	Fates, Edward (Ted)	0.20	137.70	11,704.05	WO	HD	TR	
06/05/24	9649031	Analyze SEC document production relating to communications with counsel for P. Williams	Fates, Edward (Ted)	0.40	275.40	11,979.45	WO	HD	TR	
06/10/24	9679832	Analyze draft proposed declaration from Receiver in support of SEC motion for summary judgment	Fates, Edward (Ted)	0.80	550.80	12,530.25	WO	HD	TR	
06/13/24	9658825	Call/emails with Receiver and SEC counsel regarding Receiver declaration in support of SEC motion for summary judgment,	Fates, Edward (Ted)	1.70	1,170.45	13,700.70	WO	HD	TR	

07/26/24 17:29:43 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

#### Fees for Matter 393983.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered bifurcated consent to judgment signed by Hirschmann, and related issues (1.1) discuss same with Receiver and assist with locating exhibit documents for Receiver declaration (.6)	Timekeeper	Hours	Fees	Sum		Circle	Action	
06/18/24	9664976	Analyze Corporate Transparency Act requirements and beneficial owner reports required for receivership entities (.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.60	413.10	14,113.80	WO	HD	TR	
06/19/24	9665798	Prepare draft email to defendant and relief defendant counsel and pro se parties regarding Corporate Transparency Act, BOI reports and information needed	Fates, Edward (Ted)	0.70	481.95	14,595.75	WO	HD	TR	
06/20/24	9667018	Call with Receiver and SEC counsel re: issues relating to bifurcated consents for receivership entities, disgorgement amounts and forensic accounting	Fates, Edward (Ted)	0.80	550.80	15,146.55	WO	HD	TR	
06/21/24	9668461	Analyze proposed stipulation and order dismissing Francom from case (.3) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.50	344.25	15,490.80	WO	HD	TR	
06/24/24	9670562	Discuss Francom dismissal issue with Receiver (.2) respond to SEC counsel and parties re: same (.1)	Fates, Edward (Ted)	0.30	206.55	15,697.35	WO	HD	TR	
06/25/24	9672757	Communications with counsel for A. Montgomery re: issues relating to potential settlement with SEC	Fates, Edward (Ted)	0.30	206.55	15,903.90	WO	HD	TR	
06/26/24	9675630	Call with counsel for A. Montgomery re: potential settlement with SEC and issues related thereto (.4) discuss same and email	Fates, Edward (Ted)	0.90	619.65	16,523.55	WO	HD	TR	

07/26/24 17:29:43 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

#### Fees for Matter 393983.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered to counsel for parties regarding Corporate Transparency Act requirements with Receiver (.5)	Timekeeper	Hours	Fees	Sum	Circle Action	
06/27/24	9675461	Finalize email to counsel and pro se parties regarding Corporate Transparency Act filing requirements (.3) follow up communications with M. Delgado re: same (.4)	Fates, Edward (Ted)	0.70	481.95	17,005.50	WO HD TR	_
06/28/24	9676686	Call with SEC counsel regarding issues relating to potential settlement with A. Montgomery (.5) analyze SEC motion to dismiss claims against Francom (.2)	Fates, Edward (Ted)	0.70	481.95	17,487.45	WO HD TR	_

#### Disbursements for Matter 393983.00002 (General Receivership)

Trans Date	Index	Туре	Quantity	Amt				
04/01/24	2874796	EDISC – CS Disco, Inc Monthly Hosting for April 2024	0.00	180.18	WO	HD	TR	
04/02/24	2872417	ADV – Truist Financial - Fee for document production in response to a subpoena	0.00	60.00	WO	HD	TR	
04/24/24	2876851	DEPO – Gradillas Court Reporters - Deposition Transcript of Rolf M. Hirschmann Taken on 04/16/2024	0.00	597.90	WO	HD	TR	
04/24/24	2876852	DEPO – Gradillas Court Reporters - Deposition Transcript of Alexandria Bovee Taken on 04/15/2024	0.00	885.15	WO	HD	TR	
04/26/24	2877932	ADV – Wells Fargo Bank - Produced Documents	0.00	133.50	WO	HD	TR	
04/26/24	2877933	ADV – Wells Fargo Bank - Produced Documents	0.00	37.25	WO	HD	TR	
04/29/24	2888251	DEPO – Lexitas - Deposition Transcript of Loretta J. Cruz Vol: I Taken on 04/15/2024	0.00	971.75	WO	HD	TR	
04/30/24	2879548	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for April 2024	0.00	188.00	WO	HD	TR	

07/26/24 17:29:43 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

#### Disbursements for Matter 393983.00002 (General Receivership)

Trans								
<b>Date</b> 05/01/24	Index 2878907	<b>Type</b> EDISC – CS Disco, Inc Monthly Hosting for May 2024	<b>Quantity</b> 0.00	<b>Amt</b> 180.20	WO	HD	TR	
05/30/24	2885100	POS – Nationwide Legal, LLC - One Nevada Credit Union, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	199.20	WO	HD	TR	
05/30/24	2885570	POS – Process of Service - Nationwide Legal LLC - Wells Fargo Bank, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	199.80	WO	HD	TR	
05/30/24	2885571	POS – Process of Service - Nationwide Legal LLC - Homebank Texas, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	342.70	WO	HD	TR	
05/30/24	2885572	POS – Process of Service - Nationwide Legal LLC - Navy Federal Credit Union Attn: B. Lyne Courtney (or Authorized Agent/Representative) 820 Follin Lane SE Vienna, VA 22180, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	344.90	WO	HD	TR	
05/30/24	2885573	POS – Process of Service - Nationwide Legal LLC - Bank of America, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	175.10	WO	HD	TR	
05/30/24	2885574	POS – Process of Service - Nationwide Legal LLC - JPMorgan Chase Bank, National Association, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	176.30	WO	HD	TR	
05/31/24	2885239	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for May 2024	0.00	452.00	WO	HD	TR	
06/12/24	2885010	ODS – One Nevada Credit Union - Producing documents in response to subpoena	0.00	140.00	WO	HD	TR	
06/13/24	2884093	ADV – Homebank Texas - Subpoena Research Fees	0.00	380.60	WO	HD	TR	
06/25/24	2888928	ODS – Wells Fargo Summons and Subpoenas Department - Production of Documents	0.00	150.00	WO	HD	TR	

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Trans Date	Index	Туре		Quantity	Amt	
06/30/24	2890650	EDISC – Sandline Disc technology and service	overy LLC - Everlaw eDiscovery s for June 2024	0.00	276.00 WO HD	TR _
Proforma S	Summary					
Timekeepe						
Number 001665 002307 002510 Subtotal Fe Discount Total Fees Total Disbu		ard (Ted) ona	Hours 24.00 1.00 1.30 26.30	Rate 688.50 337.50 481.50	Amounts 16,524.00 337.50 625.95 \$17,487.45 \$17,487.45 0.00 17,487.45 6,070.53	
(		( } ( ) ( ) 2 rates (automatic) no text e	Hold Write Off Transfer All  diting; copies @ .10			

	F	Fiscal YTD			)			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements	
Worked	6,263.45	5,283.45	980.00	32,999.88	26,929.35	6,070.53	138,100.49	82,756.35	55,344.14	
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	1,942.40	1,926.00	16.40	
Billed	0.00	0.00	0.00	90,531.86	41,258.25	49,273.61	41,258.25	41,258.25	49,273.61	
Collected	0.00	0.00	0.00	90,531.86	41,258.25	49,273.61	90,531.86	41,258.25	49,273.61	

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07/26/24 17:29:43 PROFORMA STATEMENT FOR MATTER 393983.00002 (Krista Freitag, as Receiver for Integrat) (General Receivership)

AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	Total 68,642.30	Fees 41,498.10	Costs 27,144.20						
Balance	ŕ	ŕ	•						
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

#### Billing Address

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al.

E3 Advisors

501 West Broadway, Suite 290 San Diego, CA 92101

07/26/24 17:29:45 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

**Preliminary Billing Form** 

Billing Atty: 001665 - Fates, Edward

Matter #: 393983.00003

Client Name: Krista Freitag, as Receiver for Integrat

(Ted)
Date of Last Billing: 04/11/24

Matter Name: Asset Investigation & Recovery

Proforma Number: 1284932

Client Matter Number:

Client/Matter Joint Group # 393983.1

#### Fees for Matter 393983.00003.(Asset Investigation & Recovery)

<b>Trans Date</b> 04/01/24	<b>Index</b> 9574064	Description of Service Rendered Complete outline of deposition outline for Flanagan/Murchison, including by selecting and preparing relevant documents (2.5).	<b>Timekeeper</b> Robichaud, James	Hours 2.50	<b>Fees</b> 866.25	<b>Sum</b> 866.25	WO	<b>Circle</b> HD	<b>Action</b> TR _	
04/01/24	9578567	Email correspondence with First Fidelity Bank regarding withdrawal of subpoena (0.1); Email correspondence with American Express representative regarding update on document production (0.1); Phone calls and email correspondence with CoStar regarding subpoena (0.3); Confer with James Robichaud regarding documents from Murchison production (0.2); Continue preparing for Murchison/Flanagan depositions (1.6); Email correspondence with Wells Fargo regarding missing documents relating to account closures (0.2); Cursory review of document productions from Bank of America, Wells Fargo, and Fletcher Jones and email correspondence with client regarding same (0.5)	Pham, Matt D.	3.00	1,444.50	2,310.75	WO	HD	TR _	

Fees for M	Matter 39398	33.00003.(Asset Investigation & Recovery)								
<b>Trans Date</b> 04/01/24	<b>Index</b> 9578577	Description of Service Rendered Review and analyze purported issues with Wells Fargo's document production and email correspondence with Jennifer Floyd regarding potential explanation (0.3); Cursory review of document productions from Capital One, Discover, and JPMorgan Chase Bank and email correspondence with client's team regarding same (0.8)	<b>Timekeeper</b> Pham, Matt D.	<b>Hours</b> 1.10	<b>Fees</b> 529.65	<b>Sum</b> 2,840.40	WO	<b>Circle</b> HD	<b>Action</b> TR	
04/02/24	9578592	Virtually meet with Clear Secure's counsel regarding subpoena (0.3); Continue preparing additional subpoenas to new individual and entity targets (1.2); Continue preparing for Murchison/Flanagan depositions (1.5)	Pham, Matt D.	3.00	1,444.50	4,284.90	WO	HD	TR	
04/03/24	9573992	Prepare documents and begin rough draft of deposition outline for Loretta Cruz (2.1).	Robichaud, James	2.10	727.65	5,012.55	WO	HD	TR	
04/03/24	9578606	Continue preparing for Murchison/Flanagan deposition (1.6); Continue preparing for Qualcan deposition (0.5); Review letter from Qualcan's litigation counsel and email correspondence with same regarding scheduling of meet and confer and deposition (0.3); Phone call with Murchison's outside counsel regarding Flanagan's termination and Murchison deposition (0.5); Confer with Josh del Castillo regarding approach for deposition in light of Flanagan's termination (0.2); Prepare notes regarding questions for deposition for Murchison PMK in light of Flanagan's termination (1.0)	Pham, Matt D.	4.10	1,974.15	6,986.70	WO	HD	TR	

Fees for I	Fees for Matter 393983.00003.(Asset Investigation & Recovery)										
<b>Trans Date</b> 04/04/24	<b>Index</b> 9575867	Description of Service Rendered Advise on issues relating to upcoming depositions and document productions for Murchison, Flanagan and Cruz	<b>Timekeeper</b> Fates, Edward (Ted)	<b>Hours</b> 0.60	<b>Fees</b> 413.10	<b>Sum</b> 7,399.80	WO	<b>Circle</b> HD	<b>Action</b> TR		
04/04/24	9578628	Phone call with America's Title representative regarding subpoena (0.1); Begin preparing additional subpoenas to entities who received payments from Loretta Cruz (1.1); Email correspondence with Ted Fates regarding development regarding Murchison (0.3); Cursory review of document productions from America's Title and Truist Bank and email correspondence with client regarding same (0.3); Confer with Ted Fates regarding development regarding Murchison and approach for depositions (0.4)	Pham, Matt D.	2.20	1,059.30	8,459.10	WO	HD	TR	_	
04/05/24	9578642	Email correspondence with Murchison's counsel regarding contact with Ryan Flanagan (0.1); Continue preparing additional subpoenas to entities who received payments from Loretta Cruz (1.2); Cursory review of document productions from American Express and Chase and email correspondence with client regarding same (0.4)	Pham, Matt D.	1.70	818.55	9,277.65	WO	HD	TR		
04/08/24	9578194	Communications with counsel for Hirschmann re: upcoming depositions (.3) discuss Flanagan, Qualcan and accounting related issues with Receiver (.4) advise on issues and strategy relating Qualcan, Flanagan and Cruz depositions (.5)	Fates, Edward (Ted)	1.20	826.20	10,103.85	WO	HD	TR		

Fees for N	Fees for Matter 393983.00003.(Asset Investigation & Recovery)											
Trans	<b>Index</b> 9584775	Description of Service Rendered Continue preparing for deposition of Ryan Flanagan (2.5); Begin preparing for deposition of Loretta Cruz (1.0); Confer with Ted Fates regarding depositions of Loretta Cruz and Ryan Flanagan (0.3); Phone call with office of Loretta Cruz's former counsel regarding contact information for Loretta Cruz (0.1); Phone call with Ed Ji regarding contact from Nicole Doney and email correspondence with Nicole Doney regarding information on potential receivership assets (0.2); Phone call with Nicole Doney regarding connection of Thercia Dasilva to alleged scheme (0.6)	<b>Timekeeper</b> Pham, Matt D.	<b>Hours</b> 4.70	<b>Fees</b> 2,263.05	<b>Sum</b> 12,366.90	WO	Circle HD	<b>Action</b> TR			
04/09/24	9580083	Discuss upcoming depositions for Cruz and Flanagan with Receiver and counsel (.6) analyze new information obtained from witnesses and advise on related investigative tasks (.7)	Fates, Edward (Ted)	1.30	895.05	13,261.95	WO	HD	TR			
04/09/24	9584777	Continue preparing for deposition of Ryan Flanagan (0.5); Review and analyze emails sent by Nicole Doney regarding Thercia Dasilva (0.3); Email correspondence with client regarding information provided by Nicole Doney (1.0); Email correspondence with Nicole Doney regarding documents provided (0.1); Phone call with Ryan Flanagan regarding his outstanding document production and scheduling of deposition (0.1); Email correspondence and voice mail with Loretta Cruz regarding document production and deposition (0.2); Continue preparing for deposition of Loretta Cruz (1.7)	Pham, Matt D.	3.90	1,877.85	15,139.80	WO	HD	TR			

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum		Circle	Action
04/10/24	9580746	Communications with counsel for investor with pending lawsuit against Qualcan / Mystic (.6) advise on strategy and next steps on investigative tasks (.4) analyze information obtained from neighbor at Gracemoor property (.3)	Fates, Edward (Ted)	1.30	895.05	16,034.85	WO	HD	TR
04/10/24	9584787	Email correspondence with Murchison's counsel regarding contact with Ryan Flanagan and scheduling depositions (0.1); Review and analyze document productions from Bank of America, One Nevada, PayPal, and Zelle and continuing preparing deposition outline for Loretta Cruz deposition (3.3); Review client's email regarding outstanding requests to banks and begin preparing subpoenas and follow-up requests thereto (1.6)	Pham, Matt D.	5.00	2,407.50	18,442.35	wo	HD	TR
04/11/24	9584793	Phone call with Sean Kelly regarding interest in acquiring RARI Nutrition's assets and email correspondence with client regarding same (0.2); Follow-up phone call with Nicole Doney regarding additional information on Thercia Dasilva and Mike Garcia (0.9); Virtually meet with Qualcan's counsel regarding meet-and-confer issues with respect to document and deposition subpoenas (0.4); Confer with Ted Fates regarding Qualcan-related approach for deposition (0.3); Review claims bar date notice provided by Bruce Mogel's estate's counsel and email correspondence with counsel regarding request for relevant filings (0.3); Continue reviewing relevant	Pham, Matt D.	5.40	2,600.10	21,042.45	WO	HD	TR

#### Fees for Matter 393983.00003.(Asset Investigation & Recovery)

Trans Date	Index	<b>Description of Service Rendered</b> document productions and preparing outline for Loretta Cruz deposition (3.3)	Timekeeper	Hours	Fees	Sum	Circle Action			
04/11/24	9604419	Advise on investigative steps relating to Cruz, Garcia, B. Mogul and Qualcan, discuss same with Receiver (.8) analyze issues relating to Qualcan subpoena and upcoming deposition (.4) conference call with Qualcan counsel re: same (.6) Advise on issues and next steps re: Qualcan document production and deposition (.4)	Fates, Edward (Ted)	2.20	1,514.70	22,557.15	WO	HD	TR	
04/12/24	9584797	Continue preparing deposition outline for Loretta Cruz (2.2); Confer with Ted Fates regarding Cruz deposition approach (0.1); Phone call with client regarding update on Von Kaiser search (0.1)	Pham, Matt D.	2.40	1,155.60	23,712.75	WO	HD	TR	
04/12/24	9585490	Analyze issues re: potential claim against B. Mogul estate (.2) revisions to outline for L. Cruz deposition on 4/15 (.7) advise Receiver on issues relating to preservation of company domains and websites (.4) advise on strategy for L. Cruz deposition (.5)	Fates, Edward (Ted)	1.80	1,239.30	24,952.05	WO	HD	TR	
04/14/24	9594263	Review and analyze spreadsheet prepared by client regarding Loretta Cruz transfers and incorporate into deposition outline	Pham, Matt D.	2.10	1,011.15	25,963.20	WO	HD	TR	
04/15/24	9586319	Advise on issues relating to non- appearance of L. Cruz for deposition (.2) discuss investigative tasks relating to accounting, Cruz, Garcia and Hirschmann with Receiver (.4)	Fates, Edward (Ted)	0.60	413.10	26,376.30	WO	HD	TR	

Fees for Matter 393983.00003.(Asset Investigation & Recovery)										
Trans										
Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum		Circle Action		
04/15/24	9594264	Continue preparing for deposition of Loretta Cruz (2.8); Virtually appear for Loretta Cruz deposition (no show) (0.6); Continue preparing outline for depositions of Murchison and Flanagan (0.9); Cursory review of documents produced by Wells Fargo, Comenity Bank, Ferrari of Newport Beach and email correspondence with client regarding same (0.6); Review additional information provided by Nicole Doney regarding Mike Garcia and email correspondence with her regarding same (0.3); Review and analyze document production from CoStar Group (0.3)	Pham, Matt D.	5.50	2,648.25	29,024.55	WO	HD	TR	
04/16/24	9587600	Advise on investigative issues, strategy and deposition preparation relating to Murchison / Flanagan and Cruz (.9) discuss same with Receiver (.3) communications with SEC counsel regarding document productions (.2)	Fates, Edward (Ted)	1.40	963.90	29,988.45	WO	HD	TR	
04/16/24	9594269	Email correspondence with Ted Fates regarding Murchison/Flanagan issues (0.2); Confer with Ted Fates regarding demand letter to Ferrari of Newport Beach/Roberto Amorosi and outstanding subpoena issues (0.9); Begin drafting demand letter to Roberto Amorosi and Ferrari of Newport Beach regarding demand for turnover of profits from sale of Maserati (2.5); Continue preparing additional subpoenas to various banks (0.6)	Pham, Matt D.	4.20	2,022.30	32,010.75	WO	HD	TR	
04/17/24	9594277	Email correspondence with Lisa Ryan regarding update on Intuit QuickBooks	Pham, Matt D.	5.20	2,503.80	34,514.55	WO	HD	TR	

Fees for I	Matter 39398	33.00003.(Asset Investigation & Recovery)						
Trans Date	Index	Description of Service Rendered accounts (0.1); Review and analyze document productions from PayPal and Zelle for preparation of additional subpoenas to banks (1.6); Continue preparing additional subpoenas to Bank of America, Capital One, Chase, One Nevada, and Wells Fargo (3.5)	Timekeeper	Hours	Fees	Sum	Circle	Action
04/18/24	9590371	Advise on investigative tasks relating to Flanagan, Cruz, and Qualcan (.5) discuss same and Hirschmann artwork issue with Receiver (.5) communications with counsel for Hirschmann re: recovery of paintings (.4)	Fates, Edward (Ted)	1.40	963.90	35,478.45	WO HD	TR
04/18/24	9594283	Confer with Ted Fates regarding updates on deposition subpoena updates (0.2); Phone call with CoStar representative regarding document production (0.1); Continue drafting demand letter to Roberto Amorosi and Ferrari of Newport Beach (1.3); Phone call with Thomas Puzzo regarding subpoenas and forthcoming document production (0.3)	Pham, Matt D.	1.90	914.85	36,393.30	WO HD	TR
04/19/24	9594288	Confer with Ted Fates regarding approach with Qualcan and phone call with Tom Puzzo (0.1); Email correspondence with Tom Puzzo regarding recap of prior discussion (0.6); Email correspondence with client regarding explanation of CoStar and Wells Fargo productions (0.3)	Pham, Matt D.	1.00	481.50	36,874.80	WO HD	TR
04/19/24	9604437	Call with counsel for Hirschmann re: recovery of paintings and questions concerning tours at Qualcan facility (.6) advise on strategy and next steps for	Fates, Edward (Ted)	1.40	963.90	37,838.70	WO HD	TR

Fees for Matter 393983.00003.(Asset Investigation & Recovery)										
Trans Date	Index	Description of Service Rendered Qualcan subpeona and response to same (.4) analyze further document production from SEC (.4)	Timekeeper	Hours	Fees	Sum	Circle Action			
04/22/24	9593589	Advise on next steps re: Qualcan subpoenas and Flanagan deposition (.3) analyze issues relating to Murchison document production and attorney-client privileges claims (.5)	Fates, Edward (Ted)	0.80	550.80	38,389.50	WO	HD	TR	
04/22/24	9602383	Review and analyze Murchison's privilege log with respect to its document production (0.4); Continue drafting demand letter to Amorosi and Ferrari/Maserati of Newport Beach (1.5); Review and analyze Qualcan's counsel's email regarding response to document subpoena (0.2)	Pham, Matt D.	2.10	1,011.15	39,400.65	WO	HD	TR	
04/23/24	9596213	Communications with Receiver and G. Rodriguez regarding alleged prereceivership HOA violation for Gracemoor property and potential resolution of same (.6) communications with counsel for HOA (.3) advise on issues relating to Murchison and Flanagan subpoenas (.4) analyze Qualcan responses to subpoena requesting documents (.5)	Fates, Edward (Ted)	1.80	1,239.30	40,639.95	WO	HD	TR	
04/23/24	9602394	Review and analyze document production from Qualcan and email correspondence with Qualcan's counsel regarding issues with same (0.5); Confer with Ted Fates regarding deposition updates and document production issues (0.8); Phone calls with Ryan Flanagan's proposed counsel regarding subpoenas (0.3); Email	Pham, Matt D.	3.30	1,588.95	42,228.90	WO	HD	TR	

#### Fees for Matter 393983.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered correspondence with Ryan Flanagan's proposed counsel regarding background of receivership (0.7); Continue drafting demand letter to Amorosi and Ferrari/Maserati (1.0)	Timekeeper	Hours	Fees	Sum	Circle Action			
04/24/24	9598229	Meet and confer call with counsel for Murchison re: document production and privilege claim issues	Fates, Edward (Ted)	0.90	619.65	42,848.55	WO	HD	TR	
04/24/24	9602402	Virtually meet with Intuit's counsel regarding results of account searches and next steps and email correspondence thereafter regarding same (0.6); Phone call with Eric Fogel and Ted Fates regarding meet and confer on Murchison's document production (1.0); Confer with Ted Fates regarding approach for Murchison's document production and deposition (0.3)	Pham, Matt D.	1.90	914.85	43,763.40	WO	HD	TR	
04/25/24	9598059	Communications with counsel for HOA re: pre-receivership construction at Gracemoor property and alleged HOA violation re: same (.7) advise Receiver re: same (.4)	Fates, Edward (Ted)	1.10	757.35	44,520.75	WO	HD	TR	
04/25/24	9602426	Continue drafting and revise demand letter to Amorosi and Ferrari & Maserati of Newport Beach	Pham, Matt D.	2.30	1,107.45	45,628.20	WO	HD	TR	
04/26/24	9599337	Follow up communications with counsel for Hirschmann re: recovery of artwork purchased by Autobahn (.2) advise Receiver on potential recovery of other personal property items (.2)	Fates, Edward (Ted)	0.40	275.40	45,903.60	WO	HD	TR	

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07/26/24 17:29:45 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

Fees for Matter 393983.00003.(Asset Investigation & Recovery) **Trans** Date Index **Description of Service Rendered** Timekeeper Hours **Fees** Sum Circle Action 04/26/24 9602433 Revise and finalize draft of demand letter to Pham. Matt D. 1.00 481.50 46.385.10 WO HD TR Amorosi and Ferrari & Maserati of Newport Beach 04/29/24 9601410 Analyze and advise on investigative tasks, Fates, Edward (Ted) 0.30 206.55 46,591.65 WO HD TR including Qualcan document production and deposition, Flanagan, and Murchison 04/29/24 9608004 WO HD Confer with Ted Fates regarding updates Pham, Matt D. 0.20 96.30 46.687.95 TR on depositions and subpoenas 04/30/24 9603710 Communications with counsel for HOA for Fates, Edward (Ted) 0.30 206.55 46.894.50 WO HD TR Gracemoor property regarding prereceivership construction, violation and fine issues 04/30/24 Revise and finalize demand letter to HD 9608055 Pham, Matt D. 0.30 144.45 47,038.95 WO TR Amorosi and Ferrari/Maserati 05/02/24 9613089 Email correspondence with Nicole Doney Pham, Matt D. 0.10 48.15 47,087.10 WO HD TR regarding follow up 05/03/24 9610541 Advise on investigative tasks, subpoenas, Fates, Edward (Ted) 1.20 826.20 47,913.30 WO HD TR document productions and upcoming depositions for Qualcan, Murchison and Flanagan (.4) follow up communications with counsel for Hirschmann re: artwork (.2) communications with counsel for HOA for Gracemoor Property (.4) communications with Receiver re: same (.2) 05/03/24 9613100 Confer with Ted Fates regarding updates Pham, Matt D. 0.30 144.45 48,057.75 WO HD TR on subpoenas and depositions

Fees for Matter 393983.00003.(Asset Investigation & Recovery)										
Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum		Circle	Action	
05/06/24	9611892	Analyze communications and documents from counsel for HOA for Gracemoor property re: construction approval, violation and fines (.7) call with counsel for investor with lawsuti against Qualcan / Mystic regarding action in Las Vegas court and discovery issues (.5) advise on strategy and next steps re: investigation into Qualcan tours and communications with investors who took tours (.4)	Fates, Edward (Ted)	1.60	1,101.60	49,159.35	WO	HD	TR	
05/07/24	9614352	Advise on issues relating to Flanagan and Qualcan depositions (.2) call/emails with counsel for Hirschmann re: paintings purchase by Autobahn and recovery of same (.9)	Fates, Edward (Ted)	1.10	757.35	49,916.70	WO	HD	TR	
05/07/24	9619498	Confer with Ted Fates regarding update on depositions and subpoenas	Pham, Matt D.	0.20	96.30	50,013.00	WO	HD	TR	
05/08/24	9615168	Advise on discovery issues relating to Murchison and privilege log and next steps re: same (.4) discuss interviews of investors who took tours of Qualcan facility with Receiver (.4) discuss issues re: Autobahn artwork with Receiver (.2) analyze communications with counsel for Hirtschmann regarding artwork issue, property maintenance issues (.5)	Fates, Edward (Ted)	1.50	1,032.75	51,045.75	WO	HD	TR	
05/08/24	9619532	Phone call with Eric Fogel regarding follow up of Murchison's outstanding obligations prior to deposition (0.3); Confer with Ted Fates regarding Eric Fogel's responses to inquiries on document production and privilege (0.4)	Pham, Matt D.	0.70	337.05	51,382.80	WO	HD	TR	

#### Fees for Matter 393983.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
05/09/24	9616907	Discuss communication from counsel for Hirschmann regarding Boise real properties and investor interviews re: Qualcan tours with Receiver	Fates, Edward (Ted)	0.40	275.40	51,658.20	WO	HD	TR	
05/10/24	9617212	Analyze information from Receiver regarding maintenance at Boise real properties (.8) discuss same and email response with Receiver and G. Rodriguez (.9)	Fates, Edward (Ted)	1.70	1,170.45	52,828.65	WO	HD	TR	
05/13/24	9619982	Communications with G. Rodriguez regarding Boise properties, maintenance of same, and response to counsel for Hirschmann re: same	Fates, Edward (Ted)	0.40	275.40	53,104.05	WO	HD	TR	
05/14/24	9621823	Communications with Receiver and counsel for HOA regarding scheduling of Zoom meeting re: pre-receivership construction at Gracemoor property (.3) call/emails with Receiver and G. Rodriguez re: strategy for HOA meeting (.9) communications with investors and counsel for investors who took tours of Qualcan facility re: Zoom calls to discuss same (1.6) discuss same with Receiver and A. Herren (.6) advise on discovery issues relating to Qualcan, Murchison and Flanagan (.3)	Fates, Edward (Ted)	3.70	2,547.45	55,651.50	WO	HD	TR	
05/14/24	9629088	Email correspondence with Murchison's counsel regarding follow up and Loretta Cruz contact information (0.3); Confer with Ted Fates regarding deposition updates (0.3)	Pham, Matt D.	0.60	288.90	55,940.40	WO	HD	TR	

Fees for M	Matter 39398	33.00003.(Asset Investigation & Recovery)								
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<b>Date</b> 05/15/24	<b>Index</b> 9623380	Description of Service Rendered Call with Receiver, G. Rodriguez and HOA board re: construction at Gracemoor property and alleged HOA violation relating to same (1.1) calls/emails re: same with Receiver and G. Rodriguez (.6)	<b>Timekeeper</b> Fates, Edward (Ted)	<b>Hours</b> 1.70	<b>Fees</b> 1,170.45	<b>Sum</b> 57,110.85	WO	HD	<b>Action</b> TR	
05/16/24	9624076	Communications with investors who took tours of Qualcan facility (.3) communications with Receiver re: Autobahn artwork, dates and amounts of purchases, and Hirschmann story relating to same (.4) discuss accounting of additional transfers, purchases and transactions with Receiver and next steps re: same (.7) advise on additional investigative subpoenas (.4) analyze info from G. Rodriguez on prereceivership construction issues at Gracemoor property and advise on same (.4)	Fates, Edward (Ted)	2.20	1,514.70	58,625.55	WO	HD	TR	
05/17/24	9625175	Communications with counsel for HOA for Gracemoor property regarding alleged violation and potential resolution of same (.7) communications witrh G. Rodriguez re: Hacienda and response to counsel for Hirschmann (.4)	Fates, Edward (Ted)	1.10	757.35	59,382.90	WO	HD	TR	
05/20/24	9627285	Analyze and revise Receiver's draft response to counsel for Hirschmann regarding Rari Nutrition (.6) discuss same with Receiver (.3) communications with investors who took tours of Qualcan cannabis facility in Las Vegas (.3)	Fates, Edward (Ted)	1.20	826.20	60,209.10	WO	HD	TR	
05/20/24	9632993	Email correspondence with Phil Trenchak regarding retention by Ryan Flanagan	Pham, Matt D.	0.20	96.30	60,305.40	WO	HD	TR	

## Fees for Matter 393983.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum		Circle	Action
05/21/24	9629727	Communications with investors who took tours of Qualcan facility re: scheduling of meetings to discuss same (.7) communications with Receiver re: artwork taken from Hacienda property and payments for same (.4) discuss document production issues with Receiver (.3)	Fates, Edward (Ted)	1.40	963.90	61,269.30	WO	HD	TR _
05/22/24	9630880	Communications with investor who took tour of Qualcan cannabis facility to arrange Zoom meeting (.3) advise on issues relating to subpoenas, document productions, privilege issues, and upcoming depositions (.5) discuss response to counsel for Hirschmann regarding Rari Nutrition with Receiver (.3)	Fates, Edward (Ted)	1.10	757.35	62,026.65	WO	HD	TR _
)5/22/24	9633008	Confer with Ted Fates regarding deposition issues and investor interviews (0.3); Review and analyze investors' documents and notes from prior interviews with investors (0.8)	Pham, Matt D.	1.10	529.65	62,556.30	WO	HD	TR _
05/23/24	9631994	Work on response to message from counsel for Hirschmann regarding Rari Nutrition (.5) discuss same with Receiver (.2) advise on scheduling issues for Qualcan deposition (.2) meeting with investor who took tour of Qualcan facility (1.4) analyze emails and attachments from same (.4) discuss same with Receiver (.3) meeting with other investors who toured Qualcan facility (1.6)	Fates, Edward (Ted)	4.60	3,167.10	65,723.40	WO	HD	TR _

Fees for N	Matter 39398	33.00003.(Asset Investigation & Recovery)								
Trans Date 05/23/24	Index 9633015	Description of Service Rendered Review and analyze documents provided by investors ahead of investor phone calls (0.7); Virtually meet with investor Frank Pulciani and Ted Fates regarding Qualcan tour (1.4); Confer with Ted Fates regarding investor meeting with Frank Pulciani (0.1); Phone calls with Ryan Flanagan's counsel regarding subpoenas (0.3); Virtually meet	<b>Timekeeper</b> Pham, Matt D.	<b>Hours</b> 4.10	<b>Fees</b> 1,974.15	<b>Sum</b> 67,697.55	WO	<b>Circle</b> HD	<b>Action</b> TR	
05/24/24	9634098	with investors Ian and Yvonne Hanson and Ted Fates regarding Qualcan tour (1.6)  Analyze documents, videos and recordings from investor who took tour of Qualcan facility	Fates, Edward (Ted)	0.40	275.40	67,972.95	WO	HD	TR	
05/24/24	9640441	Phone call with Ryan Flanagan's counsel regarding deposition and document production (0.2); Review amended privilege log from Murchison (0.2)	Pham, Matt D.	0.40	192.60	68,165.55	WO	HD	TR	
05/27/24	9635374	Communications with counsel for HOA regarding resolution of alleged violation relating pre-receivership construction at Gracemoor	Fates, Edward (Ted)	0.40	275.40	68,440.95	WO	HD	TR	
05/28/24	9636099	Analyze amended privilege log provide by counsel for Murchison law firm regarding L. Cruz matter (.4) call with investor who took tour of Qualcan facility (1.3) discuss same with Receiver (.4) prepare draft response to counsel for Hirschmann regarding Rari Nutrition and Boise properties (.9) discuss same with Receiver and G. Rodriguez (.6) finalize and send same (.3) analyze contract from contractor for removal of Gracemoor structure and discuss same with	Fates, Edward (Ted)	4.40	3,029.40	71,470.35	WO	HD	TR	

Fees for N	Matter 39398	33.00003.(Asset Investigation & Recovery)								
Trans Date	Index	Description of Service Rendered Receiver and G. Rodriguez (.5)	Timekeeper	Hours	Fees	Sum		Circle	Action	
05/28/24	9640443	Email correspondence with counsel for Ferrari & Maserati of Newport Beach and Roberto Amorosi regarding follow-up on demand letter (0.4); Multiple phone calls with Ryan Flanagan's counsel regarding attorney-client privilege issue (0.3); Perform legal research on receiver/attorney-client privilege issue and draft email to Ryan Flanagan's counsel summarizing relevant case law thereon (0.8); Review investor documents and document production from Qualcan (0.6); Virtually meet with Ted Fates and investor Aijaz Jaat regarding Qualcan site visit (1.2)	Pham, Matt D.	3.30	1,588.95	73,059.30	WO	HD	TR	
05/29/24	9639264	Analyze information and pictures from investors who toured Qualcan facility (.8) communications with counsel for investor who toured Qualcan facility (.3) analyze transcript from Francom deposition regarding Qualcan tour (.4) discuss same with Receiver (.3) call with investors who toured Qualcan facility (1.3)	Fates, Edward (Ted)	3.10	2,134.35	75,193.65	WO	HD	TR	
05/29/24	9640447	Review documents and information from investor ahead of meeting (0.2); Email correspondence with Lisa Ryan regarding QuickBooks account (0.1); Prepare and update subpoenas to seven financial institutions (2.3); Email correspondence with Francom's counsel regarding subpoena to Homebank Texas (0.2); Phone call with Ryan Flanagan's counsel regarding corporate attorney-client privilege issue	Pham, Matt D.	5.40	2,600.10	77,793.75	WO	HD	TR	

Fees for N	Matter 39398	33.00003.(Asset Investigation & Recovery)							
Trans Date	Index	Description of Service Rendered (0.3); Virtually meet with Ted Fates and investor Kevin Overbay regarding Qualcan site visit (1.3); Review and analyze document production from Murchison (0.2); Phone call with Ryan Flanagan's counsel regarding Murchison retainer agreement (0.2); Review and analyze document production from Qualcan (0.6)	Timekeeper	Hours	Fees	Sum	Circ	cle Action	
05/30/24	9640248	Communications with investors and counsel for investors who toured Qualcan facility (.9) communications with A. Herren re: documents provided by investors relating to Murchison (.3) analyze investor documents relating to Qualcan and Murchison (.6) discuss same as well as issues relating to Gracemoor, Murchison, and forensic accounting with Receiver (.7)	Fates, Edward (Ted)	2.50	1,721.25	79,515.00	WO HE	) TR	
05/31/24	9645553	Analyze document productions from banks relating to closure of INR bank accounts (.6) advise Receiver on issues relating to FL properties owned by Williams entities (.3)	Fates, Edward (Ted)	0.90	619.65	80,134.65	WO HE	) TR	
06/03/24	9646770	Analyze bank records relating INR account closures (.4) communications with Receiver and counsel for HOA re: removal of structure at Gracemoor property (.4) analyze info from Receiver re: Cash App subpoena (.2)	Fates, Edward (Ted)	1.00	688.50	80,823.15	WO HE	) TR	
06/04/24	9648903	Communications with G. Rodriguez and counsel for HOA regarding structure removal project at Gracemoor property, insurance, contractor license, and related issues	Fates, Edward (Ted)	0.70	481.95	81,305.10	WO HE	) TR	

	Fees for Matter 393983.00003.	(Asset Investigation & Recovery)
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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum		Circle	Action
06/05/24	9648896	Analyze and discuss subpoena and investigative matters with Receiver (.3) analyze and advise on issues relating to Qualcan, investor tours, Murchison, Flanagan, Roacho, and related investigative tasks (.6) communications with investor who toured Qualcan facility (.3)	Fates, Edward (Ted)	1.20	826.20	82,131.30	WO	HD	TR
06/05/24	9653643	Email correspondence with client regarding additional subpoena requests (0.2); Continue preparing additional subpoenas to miscellaneous entities and individuals (1.7); Phone call with Ted Fates regarding strategy for depositions (0.5); Email correspondence with Frank Pulciani regarding request for additional meeting to discuss Qualcan tour visit (0.2)	Pham, Matt D.	2.60	1,251.90	83,383.20	WO	HD	TR
06/06/24	9649969	Communications with counsel for Francom regarding tour of Qualcan facility and meeting to discuss same (.3) analyze information on Qualcan tour provided by investor (.6) advise on issues regarding documents provided by investor (.3) call with investor who toured Qualcan facility (1.7)	Fates, Edward (Ted)	2.90	1,996.65	85,379.85	WO	HD	TR
06/06/24	9653652	Confer with Ted Fates regarding potential settlement with Ferrari & Maserati of Newport Beach and phone call with counsel for Ferrari & Maserati of Newport Beach regarding same (0.2); Email correspondence with client regarding update on Amorosi/Ferrari & Maserati matter and request for accounting relating	Pham, Matt D.	2.80	1,348.20	86,728.05	WO	HD	TR

<b>Fees for Matter</b>	393983.00003.(	Asset Investig	gation &	Recovery)

Trans Date	Index	Description of Service Rendered to Bruce Mogel (0.3); Review documents sent by David Budd for preparation of meeting with David Budd (0.4); Virtually meet with David Budd, David Liebrader, and Ted Fates regarding Qualcan tour visit (1.7); Phone calls with Steven Bloom regarding submission of proof of claim in Bruce Mogel estate probate case (0.2)	Timekeeper	Hours	Fees	Sum		Circle	Action	
06/07/24	9651726	Analyze documents provided by investor who toured Qualcan facility	Fates, Edward (Ted)	0.40	275.40	87,003.45	WO	HD	TR	
06/07/24	9653670	Phone call with Roberto Amorosi's counsel regarding potential settlement of fraudulent-transfer claim (0.2); Phone calls with Steven Bloom regarding procedural issues relating to proof of claim to be submitted in Bruce Mogel estate probate case (0.1)	Pham, Matt D.	0.30	144.45	87,147.90	WO	HD	TR	
06/10/24	9653678	Communications with counsel for Francom re: scheduling of meeting to discuss tour of Qualcan facility (.3) call with investor who toured Qualcan facility (.8) discuss same, forensic accounting issues, and issues relating to Patrick Williams Holdings property in FL with Receiver (.7)	Fates, Edward (Ted)	1.80	1,239.30	88,387.20	WO	HD	TR	
06/10/24	9663726	Virtually meet with Frank Pulciani regarding Qualcan tour (0.5); Review client's spreadsheet relating to Bruce Mogel transfers and prepare proof of claim to submit to Mogel probate estate (0.6)	Pham, Matt D.	1.10	529.65	88,916.85	WO	HD	TR	
06/11/24	9656155	Advise on Qualcan / Jade Dispensary subpoena and document production issues (.4) advise on issues relating to removal of	Fates, Edward (Ted)	2.30	1,583.55	90,500.40	WO	HD	TR	

# Fees for Matter 393983.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered structure at Gracemoor and contractor insurance (.3) call/emails with Receiver to discuss subpoenas, depositions and other investigative tasks relating to Qualcan, Murchison, Flanagan, and potential clawback claims (1.4) communications with counsel for Francom re: meeting to discuss tour (.3)	Timekeeper	Hours	Fees	Sum		Circle /	Action	
06/11/24	9656384	Review documents and prepare draft settlement agreement regarding Ferrari & Maserati of Newport Beach (1.1); emails and confer with M. Pham regarding same (0.3).	Del Castillo, Joshua	1.40	963.90	91,464.30	WO	HD	TR	
06/11/24	9663731	Phone call with JPMorgan Chase regarding subpoena (0.1); Email correspondence with JPMorgan Chase regarding additional information for locating accounts (0.2); Confer with Ted Fates regarding Qualcan and Jade subpoenas (0.1); Phone calls and email correspondence with DKC Lending regarding subpoena (0.3); Phone call with Qualcan's counsel regarding deposition and other subpoena-related matters (0.1); Email correspondence with Intuit's counsel regarding QuickBooks account (0.1)	Pham, Matt D.	0.90	433.35	91,897.65	WO	HD	TR	
06/11/24	9663735	Virtually meet with Krista Freitag and Ted Fates regarding case updates and outstanding tasks	Pham, Matt D.	1.00	481.50	92,379.15	WO	HD	TR	
06/12/24	9663738	Review and analyze documents produced by Qualcan and FedEx	Pham, Matt D.	1.00	481.50	92,860.65	WO	HD	TR	

Fees for N	Matter 39398	33.00003.(Asset Investigation & Recovery)								
<b>Trans Date</b> 06/12/24	<b>Index</b> 9679846	Description of Service Rendered Communications with Receiver re: subpoenas relating to certain account records for forensic accounting (.2) analyze	<b>Timekeeper</b> Fates, Edward (Ted)	Hours 2.10	<b>Fees</b> 1,445.85	<b>Sum</b> 94,306.50	WO	<b>Circle</b> HD	<b>Action</b> TR	
		info from Receiver regarding FedEx packages from receivership entities to law firm in Las Vegas (.3) communications with Receiver re: same (.1) call with Receiver regarding Intuit Quickbooks account data (.3) communications with attorney in Las Vegas relating to FedEx packages (.9) discuss same with Receiver (.3)								
06/13/24	9658435	Analyze and advise on contractor issues relating to potential removal of structure at Gracemoor property (.3) discuss same with Receiver and G. Rodriguez (.5) communications with counsel for HOA (.3) analyze information relating to Intuit Quickbooks account for INR (.4) discuss same with Receiver (.2) remote meeting with Dr. Francom and counsel to discuss tour of Qualcan facility (1.1) advise Receiver re: same (.3)	Fates, Edward (Ted)	3.10	2,134.35	96,440.85	WO	HD	TR	
06/13/24	9663744	Phone call with website designer of Qualcan website regarding subpoena (0.1); Review and analyze Francom deposition (0.5); Confer with Ted Fates regarding approach for Francom meeting (0.3); Virtually meet with Francom and his counsel regarding Qualcan tour (1.2)	Pham, Matt D.	2.10	1,011.15	97,452.00	WO	HD	TR	
06/14/24	9663751	Phone call with Flanagan's counsel regarding outstanding deposition and subpoena issues	Pham, Matt D.	0.70	337.05	97,789.05	WO	HD	TR	

<b>Index</b> 9671092	<b>Description of Service Rendered</b> Phone call with Flanagan's counsel regarding outstanding deposition issues	<b>Timekeeper</b> Pham, Matt D.	<b>Hours</b> 0.50	<b>Fees</b> 240.75	<b>Sum</b> 98,029.80	WO	Circle HD	<b>Action</b> TR
9671098	Phone call with Intuit's counsel regarding QuickBooks account and metadata	Pham, Matt D.	0.30	144.45	98,174.25	WO	HD	TR
9666605	Communications with counsel for Francom re: Venmo transaction (.3) advise on scheduling, preparation and strategy for upcoming depositions of Qualcan, Flanagan, Murchison (.4)	Fates, Edward (Ted)	0.70	481.95	98,656.20	WO	HD	TR
9671114	Confer with Ted Fates regarding deposition and subpoena matters (0.6); Phone call with Murchison's counsel regarding scheduling of depositions (0.1)	Pham, Matt D.	0.70	337.05	98,993.25	WO	HD	TR
9668169	Analyze information from Receiver re: Venmo transfers, cash withdrawals and FedEx shipments (.6) discuss same with Receiver (.5)	Fates, Edward (Ted)	1.10	757.35	99,750.60	WO	HD	TR
9671122	Phone call with Qualcan's counsel regarding deposition and other related issues	Pham, Matt D.	0.10	48.15	99,798.75	WO	HD	TR
9672853	Analyze and advise on issues and strategy for depositions of Qualcan, LoMedico, Murchison and Flanagan	Fates, Edward (Ted)	0.40	275.40	100,074.15	WO	HD	TR
9680345	Email correspondence with Murchison's counsel regarding deposition scheduling (0.2); Confer with Ted Fates regarding deposition and subpoena updates (0.3)	Pham, Matt D.	0.50	240.75	100,314.90	WO	HD	TR
	9671098 9666605 9671114 9668169 9671122	regarding outstanding deposition issues  9671098 Phone call with Intuit's counsel regarding QuickBooks account and metadata  9666605 Communications with counsel for Francom re: Venmo transaction (.3) advise on scheduling, preparation and strategy for upcoming depositions of Qualcan, Flanagan, Murchison (.4)  9671114 Confer with Ted Fates regarding deposition and subpoena matters (0.6); Phone call with Murchison's counsel regarding scheduling of depositions (0.1)  9668169 Analyze information from Receiver re: Venmo transfers, cash withdrawals and FedEx shipments (.6) discuss same with Receiver (.5)  9671122 Phone call with Qualcan's counsel regarding deposition and other related issues  9672853 Analyze and advise on issues and strategy for depositions of Qualcan, LoMedico, Murchison and Flanagan  9680345 Email correspondence with Murchison's counsel regarding deposition scheduling (0.2); Confer with Ted Fates regarding	regarding outstanding deposition issues  9671098 Phone call with Intuit's counsel regarding QuickBooks account and metadata  9666605 Communications with counsel for Francom re: Venmo transaction (.3) advise on scheduling, preparation and strategy for upcoming depositions of Qualcan, Flanagan, Murchison (.4)  9671114 Confer with Ted Fates regarding deposition and subpoena matters (0.6); Phone call with Murchison's counsel regarding scheduling of depositions (0.1)  9668169 Analyze information from Receiver re: Venmo transfers, cash withdrawals and FedEx shipments (.6) discuss same with Receiver (.5)  9671122 Phone call with Qualcan's counsel regarding deposition and other related issues  9672853 Analyze and advise on issues and strategy for depositions of Qualcan, LoMedico, Murchison and Flanagan  9680345 Email correspondence with Murchison's counsel regarding deposition scheduling (0.2); Confer with Ted Fates regarding	regarding outstanding deposition issues  9671098 Phone call with Intuit's counsel regarding QuickBooks account and metadata  9666605 Communications with counsel for Francom re: Venmo transaction (.3) advise on scheduling, preparation and strategy for upcoming depositions of Qualcan, Flanagan, Murchison (.4)  9671114 Confer with Ted Fates regarding deposition and subpoena matters (0.6); Phone call with Murchison's counsel regarding scheduling of depositions (0.1)  9668169 Analyze information from Receiver re: Venmo transfers, cash withdrawals and FedEx shipments (.6) discuss same with Receiver (.5)  9671122 Phone call with Qualcan's counsel regarding deposition and other related issues  9672853 Analyze and advise on issues and strategy for depositions of Qualcan, LoMedico, Murchison and Flanagan  9680345 Email correspondence with Murchison's counsel regarding deposition scheduling (0.2); Confer with Ted Fates regarding	regarding outstanding deposition issues  9671098 Phone call with Intuit's counsel regarding QuickBooks account and metadata  9666605 Communications with counsel for Francom re: Venmo transaction (.3) advise on scheduling, preparation and strategy for upcoming depositions of Qualcan, Flanagan, Murchison (.4)  9671114 Confer with Ted Fates regarding deposition and subpoena matters (0.6); Phone call with Murchison's counsel regarding scheduling of depositions (0.1)  968169 Analyze information from Receiver re: Venmo transfers, cash withdrawals and FedEx shipments (.6) discuss same with Receiver (.5)  9671122 Phone call with Qualcan's counsel regarding deposition and other related issues  9672853 Analyze and advise on issues and strategy for depositions of Qualcan, LoMedico, Murchison and Flanagan  9680345 Email correspondence with Murchison's counsel regarding deposition scheduling (0.2); Confer with Ted Fates regarding	regarding outstanding deposition issues  9671098 Phone call with Intuit's counsel regarding QuickBooks account and metadata  9666605 Communications with counsel for Francom re: Venmo transaction (.3) advise on scheduling, preparation and strategy for upcoming depositions of Qualcan, Flanagan, Murchison (.4)  9671114 Confer with Ted Fates regarding deposition and subpoena matters (0.6); Phone call with Murchison's counsel regarding scheduling of depositions (0.1)  9668169 Analyze information from Receiver re: Venmo transfers, cash withdrawals and FedEx shipments (.6) discuss same with Receiver (.5)  9671122 Phone call with Qualcan's counsel regarding deposition and other related issues  9672853 Analyze and advise on issues and strategy for depositions of Qualcan, LoMedico, Murchison and Flanagan  9680345 Email correspondence with Murchison's counsel regarding deposition scheduling (0.2); Confer with Ted Fates regarding	regarding outstanding deposition issues  9671098 Phone call with Intuit's counsel regarding QuickBooks account and metadata  9666605 Communications with counsel for Francom re: Venmo transaction (.3) advise on scheduling, preparation and strategy for upcoming depositions of Qualcan, Flanagan, Murchison's counsel regarding scheduling of depositions (0.6); Phone call with Murchison's counsel regarding scheduling of depositions (0.1)  9671114 Confer with Ted Fates regarding deposition and subpoena matters (0.6); Phone call with Murchison's counsel regarding scheduling of depositions (0.1)  9668169 Analyze information from Receiver re: Venmo transfers, cash withdrawals and FedEx shipments (.6) discuss same with Receiver (.5)  9671122 Phone call with Qualcan's counsel regarding deposition and other related issues  9672853 Analyze and advise on issues and strategy for depositions of Qualcan, LoMedico, Murchison and Flanagan  9680345 Email correspondence with Murchison's counsel regarding deposition scheduling (0.2); Confer with Ted Fates regarding	regarding outstanding deposition issues  9671098 Phone call with Intuit's counsel regarding QuickBooks account and metadata  9666605 Communications with counsel for Francom re: Venmo transaction (.3) advise on scheduling, preparation and strategy for upcoming depositions of Qualcan, Flanagan, Murchison's counsel regarding scheduling of depositions of Phone call with Murchison's counsel regarding scheduling of deposition and subpoena matters (0.6): Phone call with Murchison's counsel regarding scheduling of deposition (0.1)  9668169 Analyze information from Receiver re: Venmo transfers, cash withdrawals and FedEx shipments (.6) discuss same with Receiver (.5)  9671122 Phone call with Qualcan's counsel regarding deposition and other related issues  9672853 Analyze and advise on issues and strategy for depositions of Qualcan, LoMedico, Murchison and Flanagan  9680345 Email correspondence with Murchison's counsel regarding deposition scheduling (0.2): Confer with Ted Fates regarding (0.2): Confer with Ted Fates regarding deposition scheduling (0.2): Confer with Ted Fates regarding deposition and charaes are provided to the provided to t

Fees for N	Matter 39398	33.00003.(Asset Investigation & Recovery)								
Trans										
<b>Date</b> 06/26/24	Index 9674238	<b>Description of Service Rendered</b> Advise on strategy and scheduling issues for Qualcan, LoMedico, Murchison,	<b>Timekeeper</b> Fates, Edward (Ted)	<b>Hours</b> 0.70	<b>Fees</b> 481.95	<b>Sum</b> 100,796.85	WO	Circle HD	Action TR	
		Flanagan and Villanueva depositions (.4) analyze information from Receiver re: Autobahn artwork purchases (.3)								
06/26/24	9680361	Email correspondence and phone call with Qualcan's counsel regarding deposition and subpoena issues	Pham, Matt D.	0.30	144.45	100,941.30	WO	HD	TR _	
06/27/24	9675628	Discuss issues relating to Autobahn artwork purchase with Receiver (.3) advise on deposition scheduling issues (.2)	Fates, Edward (Ted)	0.50	344.25	101,285.55	WO	HD	TR _	
06/27/24	9680406	Email correspondence with Ryan Flanagan's counsel regarding deposition scheduling (0.2); Confer with Ted Fates regarding deposition issues (0.2)	Pham, Matt D.	0.40	192.60	101,478.15	WO	HD	TR _	
06/28/24	9679794	Analyze additional information re: artwork purchase from Receiver	Fates, Edward (Ted)	0.30	206.55	101,684.70	WO	HD	TR _	
06/28/24	9680432	Email correspondence with Nicole Doney regarding follow-up questions	Pham, Matt D.	0.20	96.30	101,781.00	WO	HD	TR <sub>-</sub>	
	Summary									_
Timekeep Number	er	Timekeeper	Hours		Rate	Amount	•			
001665		Fates, Edward (Ted)	74.60		88.50	51,362.1	_			
001842		Del Castillo, Joshua	1.40		38.50	963.9				
002510		Pham, Matt D.	99.40	48	31.50	47,861.1				
002592		Robichaud, James	4.60	34	16.50	1,593.9				
			180.00			\$101,781.0				
Subtotal F	ees					\$101,781.0				
Discount						0.0	U			

07/26/24 17:29:45 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

<b>Proforma Summary</b>					
Timekeeper Number Total Fees Total Disbursements	Timekeeper	Hours	Rate	Amounts 101,781.00 0.00	
Attorney Billing Instr	uctions				
( } BILL ALL ( } BILL FEES OI ( } BILL COST O	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	Hold Write Off Transfer All			
Billing Instructions					
expires 6/30/2025: 10	0% off 7/1/22 rates (automatic) no text e	editing; copies @ .10			

## Account Summary - As Of 07/26/24

		Fiscal YTD		Calendar YTI	D			LTD	
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	10,870.20	10,870.20	0.00	257,177.70	257,177.70	0.00	577,332.90	577,332.90	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	3.78	3.78	0.00
Billed	0.00	0.00	0.00	267,478.83	267,478.83	0.00	267,478.83	267,478.83	0.00
Collected	0.00	0.00	0.00	267,478.83	267,478.83	0.00	267,478.83	267,478.83	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	Total 309,857.85	Fees 309,857.85	Costs 0.00						
Balance AR Balance Unalloc Payment Client Trust	0.00 0.00 0.00	0.00	0.00						
Balance	0.00								

# Billing Address

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al.

07/26/24 17:29:45 PROFORMA STATEMENT FOR MATTER 393983.00003 (Krista Freitag, as Receiver for Integrat) (Asset Investigation & Recovery)

E3 Advisors 501 West Broadway, Suite 290 San Diego, CA 92101 07/26/24 17:29:47 PROFORMA STATEMENT FOR MATTER 393983.00004 (Krista Freitag, as Receiver for Integrat) (Reporting)

**Preliminary Billing Form** 

Billing Atty: 001665 - Fates, Edward

Matter #: 393983.00004

Client Name: Krista Freitag, as Receiver for Integrat

(Ted)

Date of Last Billing: 04/11/24 Proforma Number: 1284932

Matter Name: Reporting

**Client Matter Number:** 

Client/Matter Joint Group # 393983.1

# Fees for Matter 393983.00004.(Reporting)

<b>Trans Date</b> 05/15/24	<b>Index</b> 9623138	Description of Service Rendered Work on Receiver's fifth interim report (1.6) discuss same with Receiver (.2)	<b>Timekeeper</b> Fates, Edward (Ted)	<b>Hours</b> 1.80	<b>Fees</b> 1,239.30	<b>Sum</b> 1,239.30	WO	Circle HD	<b>Action</b> TR	
05/15/24	9629097	Update relevant portions of interim report	Pham, Matt D.	0.10	48.15	1,287.45	WO	HD	TR	
05/16/24	9625400	Meet and confer communications with SEC counsel regarding Receiver's Fifth Interim Report (.2) finalize same (.2)	Fates, Edward (Ted)	0.40	275.40	1,562.85	WO	HD	TR	

Proforma Summary	v
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Timekeeper				
Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.20	688.50	1,514.70
002510	Pham, Matt D.	0.10	481.50	48.15
		2.30		\$1,562.85
Subtotal Fees				\$1,562.85
Discount				0.00
Total Fees				1,562.85
Total Disbursements				0.00

# **Attorney Billing Instructions**

07/26/24 17:29:47 PROFORMA STATEMENT FOR MATTER 393983.00004 (Krista Freitag, as Receiver for Integrat) (Reporting)

( }	BILL ALL	(	}	Hold	
( }	BILL FEES ONLY	(	}	Write Off	
( }	BILL COST ONLY	(	}	Transfer All	
		•	-		
Billing	Instructions				
expires	6/30/2025: 10% off 7/1/22 rates (automatic) r	o te	xt ec	diting; copies @ .10	
•	,				

# Account Summary - As Of 07/26/24

	F	iscal YTD		Calendar YTD				LTD	
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	3,559.50	3,559.50	0.00	12,716.55	12,716.55	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	7,022.70	7,022.70	0.00	7,022.70	7,022.70	0.00
Collected	0.00	0.00	0.00	7,022.70	7,022.70	0.00	7,022.70	7,022.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	5,693.85	5,693.85	0.00						
Balance	•	•							
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

# **Billing Address**

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al.

E3 Advisors

501 West Broadway, Suite 290

San Diego, CA 92101

07/26/24 17:29:49 PROFORMA STATEMENT FOR MATTER 393983.00005 (Krista Freitag, as Receiver for Integrat) (Operations & Asset Sales)

## Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward

Client/Matter Joint Group # 393983.1

Matter #: 393983.00005

Client Name: Krista Freitag, as Receiver for Integrat

(Ted)

Date of Last Billing: 04/11/24

Matter Name: Operations & Asset Sales

Proforma Number: 1284932

Client Matter Number:

Fees for Matter 393983.00005.(Operations & Asset Sales)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum		Circle	Action	
04/09/24	9604403	Analyze order granting authority to market real property and sell personal property and discuss same with Receiver	Fates, Edward (Ted)	0.60	413.10	413.10	WO	HD	TR	
04/10/24	9581260	Analyze procedures for sales of personal property and real property assets and advise Receiver re: same	Fates, Edward (Ted)	0.30	206.55	619.65	WO	HD	TR	
04/16/24	9588179	Discuss issues re: potential sale of Rari Nutrition assets with Receiver	Fates, Edward (Ted)	0.40	275.40	895.05	WO	HD	TR	
04/18/24	9590384	Analyze and advise G. Rodriguez on terms of listing agreement for Gracemoor property and addendum thereto	Fates, Edward (Ted)	0.70	481.95	1,377.00	WO	HD	TR	
05/01/24	9608754	Analyze and advise G. Rodriguez on terms of broker listing agreement for marketing of Idaho real properties (.4) revisions to same (.3)	Fates, Edward (Ted)	0.70	481.95	1,858.95	WO	HD	TR	
05/03/24	9610289	Analyze terms and issues with proposed listing agreements for Fort Lauderdale condo and Boise storage unit (1.4) discuss and advise on revisions to same with G.	Fates, Edward (Ted)	2.20	1,514.70	3,373.65	WO	HD	TR	

07/26/24 17:29:49 PROFORMA STATEMENT FOR MATTER 393983.00005 (Krista Freitag, as Receiver for Integrat) (Operations & Asset Sales)

# Fees for Matter 393983.00005.(Operations & Asset Sales)

Trans Date	Index	<b>Description of Service Rendered</b> Rodriguez (.8)	Timekeeper	Hours	Fees	Sum		Circle	Action	
05/07/24	9615407	Discuss marketing and sale issues relating to Idaho real properties with Receiver (.4) analyze proposed contract with automobile auctioneer and advise G. Rodriguez on revisions to same (.9)	Fates, Edward (Ted)	1.30	895.05	4,268.70	WO	HD	TR	
05/08/24	9616141	Analyze and advise G. Rodriguez on broker listing agreement for storage condo unit in Boise	Fates, Edward (Ted)	0.60	413.10	4,681.80	WO	HD	TR	
05/09/24	9616921	Call/emails with automobile dealer regarding terms of listing agreement and bill of sale form to be used for prospective sales (.7) discuss same with G. Rodriguez (.2)	Fates, Edward (Ted)	0.90	619.65	5,301.45	WO	HD	TR	
05/10/24	9617826	Discuss form of Bill of Sale to be used for sales of automobiles with G. Rodriguez (.4) work on revisions to same (.5)	Fates, Edward (Ted)	0.90	619.65	5,921.10	WO	HD	TR	
05/14/24	9621822	Analyze and advise G. Rodriguez regarding contract for engagement of appraiser for Idaho residential properties	Fates, Edward (Ted)	0.40	275.40	6,196.50	WO	HD	TR	
05/21/24	9630399	Discuss sale approach and strategy for luxury vehicles with Receiver	Fates, Edward (Ted)	0.30	206.55	6,403.05	WO	HD	TR	
05/23/24	9633019	Analyze and advise G. Rodriguez on duplicate title forms for sales of cars	Fates, Edward (Ted)	0.30	206.55	6,609.60	WO	HD	TR	
05/28/24	9637729	Analyze and revise summary of court approval / sale process for broker in FL	Fates, Edward (Ted)	0.40	275.40	6,885.00	WO	HD	TR	

07/26/24 17:29:49 PROFORMA STATEMENT FOR MATTER 393983.00005 (Krista Freitag, as Receiver for Integrat) (Operations & Asset Sales)

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<b>Trans Date</b> 05/31/24	<b>Index</b> 9644892	Description of Service Rendered Communications with Receiver and G. Rodriguez regarding explanation of court- approval / sale process for brokers / listing agents for properties	<b>Timekeeper</b> Fates, Edward (Ted)	<b>Hours</b> 0.40	<b>Fees</b> 275.40	<b>Sum</b> 7,160.40	WO	Circle HD	<b>Action</b> TR
06/13/24	9659296	Analyze and advise G. Rodriguez on contract terms for potential sale of Riverpark property, deed to be used for transfer of title	Fates, Edward (Ted)	0.60	413.10	7,573.50	WO	HD	TR
06/17/24	9662126	Communications with G. Rodriguez and counsel for Hirschmann regarding code for safe located at Hacienda property	Fates, Edward (Ted)	0.40	275.40	7,848.90	WO	HD	TR
06/18/24	9664827	Communications with counsel for HOA regarding marketing of Gracemoor property and disclosures relating to disputed structure on property (.4) communications with Receiver and G. Rodriguez re: same (.3)	Fates, Edward (Ted)	0.70	481.95	8,330.85	WO	HD	TR
06/19/24	9665766	Analyze and advise G. Rodriguez on terms of Bill of Sale form for anticipated automobile sales (.6) discuss issues relating to potential sale of RARI Nutrition with Receiver (.5) analyze trademark issue (.4) communications with G. Rodriguez re: NDA for potential transaction (.3) work on NDA (.9)	Fates, Edward (Ted)	2.70	1,858.95	10,189.80	WO	HD	TR
06/26/24	9674017	Analyze and advise G. Rodriguez on revisions to Bill of Sale form for prospective automobile sales	Fates, Edward (Ted)	0.70	481.95	10,671.75	WO	HD	TR
06/28/24	9677761	Analyze and revise buyer contingency removal for Riverpark property (.3)	Fates, Edward (Ted)	0.40	275.40	10,947.15	WO	HD	TR

07/26/24 17:29:49 PROFORMA STATEMENT FOR MATTER 393983.00005 (Krista Freitag, as Receiver for Integrat) (Operations & Asset Sales)

Worked

Billed

Unbilled Adj

AR Write Off

Collected

8,262.00

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0.00

Frans Date Index	<b>Description of Service</b> communications with G. same (.1)		Timeke	eper	Hours	Fees	Sum	Circle Action
Proforma Summary	1							
Timekeeper								
Number	Timekeeper			Hours		ate	Amounts	
001665	Fates, Edward (Ted)			15.90	688	3.50	10,947.15	
				15.90			\$10,947.15	
Subtotal Fees							\$10,947.15	
Discount							0.00	
Total Fees							10,947.15	
Fotal Disbursements							0.00	
Attorney Billing Ins	tructions							
} BILL ALL		( }	Hold					
BILL FEES (	ONLY	( )	Write Off					
BILL COST	ONLY	( )	Transfer All					
		. •						
Billing Instructions		- 4: - \ 4 4	1161	10				
expires 6/30/2025:	10% off 7/1/22 rates (automa	atic) no text ed	liting; copies @ .	10				
Account Summary	- As Of 07/26/24							
	Fiscal YTD		Calendar YTD				LTD	

19,415.70

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07/26/24 17:29:49 PROFORMA STATEMENT FOR MATTER 393983.00005 (Krista Freitag, as Receiver for Integrat) (Operations & Asset Sales)

	Total	Fees	Costs
WIP	20,241.90	20,241.90	0.00
Balance			
AR Balance	0.00	0.00	0.00
Unalloc	0.00		
Payment			
Client Trust	0.00		
Balance			

## Billing Address

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al.

E3 Advisors

501 West Broadway, Suite 290

San Diego, CA 92101

07/26/24 17:29:50 PROFORMA STATEMENT FOR MATTER 393983.00006 (Krista Freitag, as Receiver for Integrat) (Claims & Distributions)

## Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward

Matter #: 393983.00006

Client Name: Krista Freitag, as Receiver for Integrat

(Ted)

Matter Name: Claims & Distributions

Date of Last Billing: 04/11/24 Proforma Number: 1284932

Client Matter Number:

Client/Matter Joint Group # 393983.1

Fees for M	Fees for Matter 393983.00006.(Claims & Distributions)										
<b>Trans Date</b> 04/09/24	<b>Index</b> 9604398	Description of Service Rendered Respond to inquiry from counsel for investor	<b>Timekeeper</b> Fates, Edward (Ted)	<b>Hours</b> 0.30	<b>Fees</b> 206.55	<b>Sum</b> 206.55	WO	<b>Circle</b> HD	Action TR		
04/16/24	9587745	Analyze documents and issues relating to claim that construction at Gracemoor violated HOA approval (.6) discuss same with Receiver and G. Rodriguez (.7) analyze HOA bylaw language and draft communication to HOA board (.5)	Fates, Edward (Ted)	1.80	1,239.30	1,445.85	WO	HD	TR		
05/20/24	9628637	Respond to inquiry from investor regarding potential litigation claims, receivership claims process, and future distributions	Fates, Edward (Ted)	0.30	206.55	1,652.40	WO	HD	TR		
06/06/24	9650501	Assist Receiver in responding to investor questions regarding claims and distributions	Fates, Edward (Ted)	0.40	275.40	1,927.80	WO	HD	TR		
06/20/24	9666617	Respond to inquiry from counsel for investor re: claims process	Fates, Edward (Ted)	0.20	137.70	2,065.50	WO	HD	TR		
Proforma	Summary										

07/26/24 17:29:50 PROFORMA STATEMENT FOR MATTER 393983.00006 (Krista Freitag, as Receiver for Integrat) (Claims & Distributions)

Timekeeper Number	Timekeeper			Hours	Rate	Amounts
001665	Fates, Edward (Ted)			3.00	688.50	2,065.50
	,			3.00		\$2,065.50
Subtotal Fees						\$2,065.50
Discount Total Fees						0.00 2,065.50
Total Disburseme	ents					0.00
Attorney Billing	Instructions					
( ) BILL ALL		( }	Hold			
( ) BILL FEE	ES ONLY ST ONLY	( }	Write Off Transfer All			
BILL CO.	SI UNLI	( }	Translet All			
Billing Instruction	ons					
expires 6/30/2025	5: 10% off 7/1/22 rates (automa	itic) no text e	editing; copies @	D .10		

## Account Summary - As Of 07/26/24

Account Summa	ary – AS Of 0//2	(6/24							
	F	iscal YTD		Calendar YTE	)			LTD	
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	206.55	206.55	0.00	6,953.85	6,953.85	0.00	22,732.20	22,732.20	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	13,575.15	13,575.15	0.00	13,575.15	13,575.15	0.00
Collected	0.00	0.00	0.00	13,575.15	13,575.15	0.00	13,575.15	13,575.15	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP Balance	9,157.05	9,157.05	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc	0.00	0.00	0.00						
Payment	0.00								
Client Trust	0.00								
Balance									

07/26/24 17:29:50 PROFORMA STATEMENT FOR MATTER 393983.00006 (Krista Freitag, as Receiver for Integrat) (Claims & Distributions)

# Billing Address

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al. E3 Advisors 501 West Broadway, Suite 290 San Diego, CA 92101

07/26/24 17:29:51 PROFORMA STATEMENT FOR MATTER 393983.00007 (Krista Freitag, as Receiver for Integrat) (Third Party Recoveries)

## Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward

Matter #: 393983.00007

Client Name: Krista Freitag, as Receiver for Integrat

(Ted)

Date of Last Billing:

Matter Name: Third Party Recoveries

**Client Matter Number:** 

Proforma Number: 1284932

Client/Matter Joint Group # 393983.1

## Fees for Matter 393983.00007.(Third Party Recoveries)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum		Circle	Action	
04/09/24	9580082	Discuss order authorizing clawback claims with Receiver and strategy / next steps re: same	Fates, Edward (Ted)	0.80	550.80	550.80	WO	HD	TR .	
04/15/24	9586947	Analyze and advise on clawbaclk claim relating to Maserati previously owned by Autobahn (.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.60	413.10	963.90	WO	HD	TR .	
04/16/24	9587843	Advise on issues and strategy for clawback claim relating to sale of Maserati	Fates, Edward (Ted)	0.40	275.40	1,239.30	WO	HD	TR .	
04/23/24	9596133	Advise on clawback claim issues relating to Amorosi and Newport Ferrari	Fates, Edward (Ted)	0.40	275.40	1,514.70	WO	HD	TR .	
04/26/24	9599110	Analyze and revise clawback demand and settlement letter to Amorosi and Newport Beach Ferrari	Fates, Edward (Ted)	0.90	619.65	2,134.35	WO	HD	TR .	
04/29/24	9603420	Analyze Receiver revisions to clawback demand letter and settlement letter to Amorosi and Ferrari dealership	Fates, Edward (Ted)	0.20	137.70	2,272.05	WO	HD	TR .	

07/26/24 17:29:51 PROFORMA STATEMENT FOR MATTER 393983.00007 (Krista Freitag, as Receiver for Integrat) (Third Party Recoveries)

Fees for N	Matter 39398	33.00007.(Third Party Recoveries)							
Trans									
<b>Date</b> 05/06/24	<b>Index</b> 9613905	Description of Service Rendered Analyze initial response from counsel for Amorosi regarding clawback demand and settlement letter	<b>Timekeeper</b> Fates, Edward (Ted)	<b>Hours</b> 0.20	<b>Fees</b> 137.70	<b>Sum</b> 2,409.75	WO	Circle HD	Action TR
05/16/24	9624538	Advise on next steps re: Amorosi / Ferrari clawback demand (.2) discuss clawback demands for transferees of other Autobahn vehicles with Receiver (.3)	Fates, Edward (Ted)	0.50	344.25	2,754.00	WO	HD	TR
06/06/24	9650262	Advise on issues relating to potential settlement of fraudulent transfer/clawback claim against Ferrari dealership (.4) advise on claim for fraudulent transfer and probate estate issues (.3)	Fates, Edward (Ted)	0.70	481.95	3,235.95	WO	HD	TR
06/10/24	9655304	Advise Receiver on issues relating to claim against Mogul estate	Fates, Edward (Ted)	0.20	137.70	3,373.65	WO	HD	TR
	Summary								
Timekeep Number 001665	er	Timekeeper Fates, Edward (Ted)	Hours 4.90 4.90		<b>Rate</b> 38.50	Amounts 3,373.65 \$3,373.65	5_		
Subtotal F Discount Total Fees Total Disb	3		4.50			\$3,373.6 0.0 3,373.6 0.0	5 0 5		
Attorney l	Billing Instr	uctions							
( ) BI	LL ALL LL FEES ON LL COST O	` ,							

#### Case 8:23-cv-00855-JWH-KES Filed 12/17/24 Page 62 of 66 Page Document 297 ID #:5313

07/26/24 17:29:51 PROFORMA STATEMENT FOR MATTER 393983.00007 (Krista Freitag, as Receiver for Integrat) (Third Party Recoveries)

## **Billing Instructions**

expires 6/30/2025: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

### Account Summary - As Of 07/26/24

	F	iscal YTD		Calendar YTD				LTD	
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,514.70	1,514.70	0.00	4,888.35	4,888.35	0.00	16,020.45	16,020.45	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	16,020.45	16,020.45	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

## Billing Address

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al.

E3 Advisors

501 West Broadway, Suite 290 San Diego, CA 92101

07/26/24 17:29:53 PROFORMA STATEMENT FOR MATTER 393983.00008 (Krista Freitag, as Receiver for Integrat) (Pending Litigation)

**Billing Instructions** 

expires 6/30/2025: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

					Preliminary Bil	ling Form							
Billing Atty: 0 (Ted)	01665 - F	ates, Edward	Matter #: 393	3983.000	008	Client Nan	ne: Krista Frei	tag, as Recei	ver for Integra	at			
Date of Last I Proforma Nui						Matter Nar	me: Pending	Litigation					
Client/Matter	Joint Gro	oup # 393983.1				Client Mat	ter Number:						
Fees for Mat	tter 3939	83.00008.(Pendir	ng Litigation)										
	<b>ndex</b> 9624081		Service Rende onse to correspo ending arbitratio	ondence			<b>Hours</b> 0.20	<b>Fees</b> 137.70	<b>Sum</b> 137.70	WO	<b>Circle</b> HD	<b>Action</b> TR	
Proforma Su													
Timekeeper		T!						D-4-	A 4 -	_			
<b>Number</b> 001665		Timekeeper Fates, Edward (	Ted)			ours 0.20		<b>Rate</b> 38.50	<b>Amounts</b> 137.70				
001000		raics, Lawara (	rea)			0.20	00		\$137.70				
Subtotal Fee	s					0.20			\$137.70				
Discount									0.00	)			
Total Fees									137.70	)			
Total Disburs	sements								0.00	)			
Attorney Bill	ling Instr	uctions											
` ,	ALL FEES OF COST O			` ,	Hold Write Off Transfer All								

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07/26/24 17:29:53 PROFORMA STATEMENT FOR MATTER 393983.00008 (Krista Freitag, as Receiver for Integrat) (Pending Litigation)

## Account Summary - As Of 07/26/24

	Fis	scal YTD		Calendar YTD				LTD	
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	137.70	137.70	0.00	1,652.40	1,652.40	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	1,514.70	1,514.70	0.00	1,514.70	1,514.70	0.00
Collected	0.00	0.00	0.00	1,514.70	1,514.70	0.00	1,514.70	1,514.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	Total 137.70	Fees 137.70	Costs 0.00						
Balance	137.70	137.70	0.00						
AR Balance Unalloc Payment	0.00 0.00	0.00	0.00						
Client Trust Balance	0.00								

# Billing Address

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al.

E3 Advisors

501 West Broadway, Suite 290

San Diego, CA 92101

07/26/24 17:29:54 PROFORMA STATEMENT FOR MATTER 393983.00009 (Krista Freitag, as Receiver for Integrat) (Employment/Fees)

## **Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward

Matter #: 393983.00009

Client Name: Krista Freitag, as Receiver for Integrat

(Ted)

Date of Last Billing: 04/11/24 Proforma Number: 1284932

Matter Name: Employment/Fees

**Client Matter Number:** 

Client/Matter Joint Group # 393983.1

# Fees for Matter 393983.00009.(Employment/Fees)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum		Circle	Action	
05/15/24	9623289	Analyze and revise Receiver's third interim fee application (.5) communications with Receiver re: same (.2)	Fates, Edward (Ted)	0.70	481.95	481.95	WO	HD	TR _	
05/20/24	9628633	Discuss preparation of 4th interim fee application with Receiver	Fates, Edward (Ted)	0.20	137.70	619.65	WO	HD	TR _	
06/05/24	9649098	Advise Receiver on fee application correction issue	Fates, Edward (Ted)	0.20	137.70	757.35	WO	HD	TR _	

<b>Proforma Summary</b>
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Timekeeper				
Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.10	688.50	757.35
		1.10		\$757.35
Subtotal Fees				\$757.35
Discount				0.00
Total Fees				757.35
Total Disbursements				0.00

# **Attorney Billing Instructions**

#### Case 8:23-cv-00855-JWH-KES Document 297 Filed 12/17/24 Page 66 of 66 Page ID #:5317

07/26/24 17:29:54 PROFORMA STATEMENT FOR MATTER 393983.00009 (Krista Freitag, as Receiver for Integrat) (Employment/Fees)

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

**Billing Instructions** 

expires 6/30/2025: 10% off 7/1/22 rates (automatic) no text editing; copies @ .10

## Account Summary - As Of 07/26/24

	Fiscal YTD		Calendar YTD		LTD				
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	963.90	963.90	0.00	2,685.15	2,685.15	0.00	3,924.45	3,924.45	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	1,032.75	1,032.75	0.00	1,032.75	1,032.75	0.00
Collected	0.00	0.00	0.00	1,032.75	1,032.75	0.00	1,032.75	1,032.75	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP Balance	2,891.70	2,891.70	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust Balance	0.00								

# Billing Address

Krista Freitag, as Receiver for Integrated National Resources, Inc. et al.

E3 Advisors

501 West Broadway, Suite 290 San Diego, CA 92101