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10 Attorneys for Receiver
KRISTA L. FREITAG

11
12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**
14 **SOUTHERN DIVISION**

15 Consumer Financial Protection Bureau
and Maria T. Vullo, Superintendent of
16 Financial Services of the State of
New York,

17 Plaintiffs,

18 v.

19 Pension Funding, LLC; Pension
20 Income, LLC; Steven Covey; Edwin
Lichtig; and Rex Hofelter,

21 Defendants.
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Case No. 8:15-cv-1329

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

Date: March 24, 2017
Time: 2:30 p.m.
Ctrm.: 10A
Judge: Hon. Josephine L. Staton

1 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"),
2 general counsel to Krista L. Freitag ("Receiver"), the Court-appointed receiver for
3 Defendants Pension Funding, LLC, Pension Income, LLC, and their subsidiaries,
4 affiliates, and successors-in-interest (collectively, "Receivership Entities"), hereby
5 submits this fourth interim application for approval and payment of fees and
6 reimbursement of expenses ("Application"). This Application covers the period
7 from October 1, 2016, through December 31, 2016 ("Fourth Application Period"),
8 and seeks interim approval of \$35,832.15 in fees and \$447.84 in expenses, and an
9 order authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred
10 (\$28,665.72) and 100% of expenses incurred. As it has throughout this case, Allen
11 Matkins has discounted its customary hourly rates by 10%.

12 I. INTRODUCTION

13 This equity receivership arises from the Complaint for Violations of the
14 Consumer Financial Protection Act and New York Banking and Financial Services
15 Laws ("Complaint") (Dkt. No. 1) filed on August 20, 2015, by the Consumer
16 Financial Protection Bureau ("Bureau") and Superintendent of Financial Services of
17 the State of New York ("Superintendent"). On or about January 8, 2016, pursuant to
18 the Court's Order Entering Stipulated Preliminary Injunction, Appointment of a
19 Receiver, and Related Matters ("Appointment Order"), the Receiver took control of
20 the Receivership Entities, their books and records, bank accounts, and assets.

21 The Appointment Order confers full powers of an equity receiver, including
22 full power over all funds, assets, books, records, and other real or personal property
23 of the Receivership Entities, and including all funds and assets transferred from
24 Pension Funding, LLC or Pension Income, LLC to entities controlled or managed by
25 Edwin Lichtig or Rex Hofelter, including PGR, LLC. The Appointment Order also
26 authorizes the Receiver to "engage and employ attorneys, accountants, and other
27 persons" to assist her in the performance of her duties. Dkt. No. 61, Section III(C).

28

The Receiver promptly determined that her experienced staff at E3 Realty Advisors, Inc., dba E3 Advisors ("E3"), as well as experienced, qualified counsel was critical due to the number of people involved, the transactional volume, and complex issues facing the receivership estate. Accordingly, the Receiver has cost-effectively used her team at E3 to assist in carrying out receivership duties and engaged Allen Matkins to act as her counsel.

In an abundance of caution, the Receiver sought specific Court approval of Allen Matkins' employment, which was granted as reflected in the minutes of the hearing on April 13, 2016. Dkt. Nos. 71, 86. The Court also approved the Receiver's proposal to file reports and fee applications on a quarterly basis. *Id.*

II. FEE APPLICATION

This fee application should be read in conjunction with the Receiver's Fourth Interim Report ("Fourth Report") filed on January 30, 2017 (Dkt. No. 130), which describes in detail the Receiver's activities during the Fourth Application Period. So as to avoid repetition, references are made to relevant portions of the interim reports, including the Fourth Report, in the below descriptions of Allen Matkins' work.

This Application seeks interim approval of \$35,823.15 in fees for a total of 75.4 hours worked, and payment on an interim basis of 80% of that amount, or \$28,665.72. The work performed is described task-by-task on Exhibit A and is broken down into the following categories:

Category	Hours	Amount
General Receivership	0.30	155.25
Asset Investigation	37.00 ¹	15,563.70
Reporting	17.20	9,288.45
Claims & Distributions	15.80	8,176.50
Employment/Fees	5.10	2,639.25
Total Fees	75.40	\$35,823.15

¹ Includes 8.5 hours of work performed by partner Yale Kim for which the firm has not charged, as discussed in Section III.A.2. below.

Allen Matkins has worked diligently and efficiently to assist the Receiver with urgent 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, including approximately \$2.8 million in cash, a \$1.1 million participating interest in a commercial real estate loan, as well as pension payments owed by pensioners. Allen Matkins' work has assisted the Receiver in carrying out her Court-ordered duties and the firm should be compensated on an interim basis.

III. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED

A. Categories and Descriptions of Work

1. General Receivership

Allen Matkins' work in this category focused on issues relating to a media blog post about the case and the receivership. The reasonable and necessary fees for work in this category total \$155.25.

2. Asset Investigation

Allen Matkins' time in this category focused on protecting the receivership estate's interests with respect to the 35 pensioner contracts affected by bankruptcy cases and 11 pensioner contracts affected by settlements or default judgments. The Receivership Entities did not maintain files or a database that tracked pensioner bankruptcies, settlements, or default judgments. Accordingly, Allen Matkins essentially had to start from scratch in gathering information and taking steps necessary to protect the receivership estate's interests. This work included:

- Reviewing case dockets and key filings in the cases;
- Gathering information about pre-receivership collection activities, if any, against the applicable pensioners, including communications with former counsel for the Receivership Entities and review of documents provided;
- Preparing and filing necessary proofs of claim and amendments to proofs of claim filed prior to the Receiver's appointment;

- 1 • Communications with counsel representing bankruptcy trustees;
- 2 • Efforts to resolve disputes concerning claim amounts and/or treatment
- 3 of claims under Bankruptcy Court-approved plans, including
- 4 preparation of necessary stipulations and other pleadings;
- 5 • Providing updates to the Receiver and advising on recovery strategies;
- 6 and
- 7 • Creating a log to track the bankruptcy cases and updating the log as
- 8 necessary and appropriate.

9 In addition, the firm issued letters to pensioners who defaulted on their
10 payments or redirected their pension payments such that their monthly payments
11 were not received. These letters have been successful in getting certain pensioners
12 to resume payments. The reasonable and necessary fees for work in this category
13 total \$15,563.70.

14 In its order granting Allen Matkins' Third Interim Fee Application, the Court
15 noted that the majority of the time in the Asset Investigation category was billed by
16 partner Yale Kim at \$549 per hour and stated that if the firm's time-intensive work
17 in the Asset Investigation category continues, the Court expects that some of that
18 work would be delegated to an associate with a lower hourly rate. Dkt. No. 129,
19 p. 7. Accordingly, rather than having an associate spend time becoming familiar
20 with the numerous bankruptcy cases, Allen Matkins has written off 8.5 hours of
21 Mr. Kim's time (approximately 25% of his time) during the Fourth Application
22 Period. The time written off is reflected in the final section of the bills attached at
23 Exhibit A entitled "Write Offs." This effectively reduces Mr. Kim's hourly rate for
24 the Fourth Application Period to from \$549.00 to \$417.18 (\$14,768.10 in fees for
25 35.4 hours of work, including the 8.5 hours written off).

26 In this regard, the receivership estate has received the benefit of Mr. Kim's
27 partner-level skill, experience, and efficiency at an associate-level hourly rate.

28

1 Moreover, as anticipated, the total fees in this category has dropped substantially
2 since the Third Application Period (\$39,599.10).

3 3. Reporting

4 Allen Matkins' time in this category focused on preparing the Receiver's
5 Third Interim Report, which was filed on November 11, 2016. Dkt. No. 117. The
6 Third Interim Report contains a detailed description of the Receiver's activities
7 during the third quarter of 2016, including cash recovered, forensic accounting
8 work, investor communications, and post-receivership receipts and disbursements.
9 The report also includes the Receiver's recommendations for the continued
10 administration of the receivership estate.

11 This category also includes work assisting the Receiver with revising and
12 finalizing her Forensic Accounting Report and Recommendations, which was filed
13 on October 19, 2016 (Dkt. No. 116), as well as Mr. Fates' attendance at the hearing
14 held on December 12, 2016. The reasonable and necessary fees for work in this
15 category total \$9,288.45.

16 4. Claims and Distributions

17 Allen Matkins' time in this category focused on responding to specific
18 inquiries from investors, pensioners, and their counsel concerning their claims,
19 distributions, and other issues related to the receivership. These inquiries were more
20 numerous and varied during the Fourth Application Period due to the filing of the
21 Receiver's Forensic Accounting Report and Recommendations.

22 This category also includes time spent gathering information about potential
23 mediators and preparing the Receiver's *ex parte* application regarding a proposed
24 ADR procedure for resolving investor claim disputes, which was filed at the Court's
25 request. Dkt. Nos. 125, 126.

26 Finally, Allen Matkins assisted the Receiver in preparing notices and
27 instructions to investors regarding the Court-approved claims process. The
28 reasonable and necessary fees for work in this category total \$8,176.50.

5. Employment/Fees

Allen Matkins time in this category focuses on preparing the Third Interim Fee Applications of the Receiver and Allen Matkins, as required by the Court's Local Rules (L.R. 66-7(f)) and the Appointment Order (Dkt. No. 61, Section VIII). The Third Interim Fee Applications were filed on December 7, 2016 (Dkt. Nos. 119, 120) and granted by the Court on January 17, 2016 (Dkt. No. 129). Time spent preparing required fee applications has been held to be compensable time. *See In re Nucorp Energy, Inc.*, 764 F.2d 655, 662 (9th Cir. 1985). The reasonable and necessary fees for work in this category total \$2,639.25.

B. Summary of Expenses Requested for Reimbursement

Allen Matkins requests the Court approve reimbursement of \$447.84 in out-of-pocket costs. The itemization of such expenses is summarized below by category. The majority of the expenses incurred relate to documents produced by a bank pursuant to a subpoena Allen Matkins issued to obtain documents necessary to the Receiver's investigation and accounting. The costs incurred by Allen Matkins during the Fourth Application Period are broken down by category as follows:

Category	Total
Legal Research (Lexis, Pacer, etc.)	\$48.90
Service of Process	214.47
Messenger Fees	108.87
Duplication/Postage	72.60
Transportation/Parking/Mileage	3.00
TOTAL	\$ 447.84

**IV. 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 his professionals,

1 including Allen Matkins. Decisions regarding the timing and amount of an award of
 2 fees and costs to the Receiver and his Professionals are committed to the sound
 3 discretion of the Court. See *SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992)
 4 (rev'd in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).

5 In allowing fees, a court should consider "the time, labor and skill required,
 6 but not necessarily that actually expended, in the proper performance of the duties
 7 imposed by the court upon the receiver[], the fair value of such time, labor and skill
 8 measured by conservative business standards, the degree of activity, integrity and
 9 dispatch with which the work is conducted and the result obtained." *United States v.*
 10 *Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks
 11 omitted). In practical terms, receiver and professional compensation thus ultimately
 12 rests upon the result of an equitable, multi-factor balancing test involving the
 13 "economy of administration, the burden that the estate may be able to bear, the
 14 amount of time required, although not necessarily expended, and the overall value of
 15 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d 232, 237 (3d Cir.
 16 1970). Regardless of how this balancing test is formulated, no single factor is
 17 determinative and "a reasonable fee is based [upon] all circumstances surrounding
 18 the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*,
 19 374 F. Supp. 465, 480 (S.D. Tex. 1974).

20 As a preliminary matter, the Appointment Order confers on the Receiver
 21 substantial duties and powers, including to conduct such investigation and discovery
 22 as is necessary to locate and account for all receivership assets, take such action as is
 23 necessary and appropriate to assume control over and preserve receivership assets,
 24 and employ attorneys and others to investigate and, where appropriate, institute,
 25 pursue, and prosecute all claims and causes of action of whatever kind and nature.
 26 See Appointment Order, Section III.

27 The Receiver promptly determined that experienced, qualified counsel was
 28 necessary due to the size and complexity of the receivership estate and the Court

1 agreed, specifically approving Allen Matkins' employment. Dkt. No. 86. The Court
 2 also approved the Receiver's proposal to file interim reports and fee applications on
 3 a quarterly basis. *Id.*

4 Allen Matkins has submitted a detailed fee application, which describes the
 5 nature of the services rendered, and the identity and billing rate of each individual
 6 performing each task. *See* Exhibit A. Allen Matkins has endeavored to staff matters
 7 as efficiently as possible while remaining cognizant of the complexity of issues.
 8 The request for fees is based on Allen Matkins' customary billing rates charged for
 9 comparable services provided in other matters, less a 10% discount. Moreover, as
 10 discussed above, the firm wrote off and did not charge for 8.5 hours of work during
 11 the Fourth Application Period, all of which was on pensioner bankruptcies.

12 The work performed by Allen Matkins was essential to carrying out the
 13 Receiver's Court-ordered duties. The Receiver and Allen Matkins have worked
 14 diligently since the Receiver's appointment to preserve and protect the assets of the
 15 receivership estate, to investigate and recover sums transferred to third parties, and
 16 to maximize the funds available for ultimate distribution to investors. Moreover,
 17 Allen Matkins seeks payment of only 80% of fees incurred on an interim basis in
 18 recognition of the fact that its work in assisting the Receiver is ongoing. Payment of
 19 the proposed 20% holdback will be sought at the conclusion of the receivership.
 20 Allen Matkins' fees are fair and reasonable and should be approved and paid on an
 21 interim basis.

22 V. CONCLUSION

23 Allen Matkins therefore respectfully requests this Court enter an Order:

- 24 1. Approving Allen Matkins' fees, on an interim basis, of \$35,832.15;
- 25 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
 26 \$28,665.72, from the assets of the Receivership Entities;
- 27 3. Approving Allen Matkins' costs in the amount of \$447.84 and
 28 authorizing and directing the Receiver to reimburse such costs in full; and

1 4. For such other and further relief as the Court deems appropriate.

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3 Dated: February 16, 2017

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

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5 By: /s/ Edward Fates

6 EDWARD G. FATES
7 Attorneys for Receiver
8 KRISTA L. FREITAG
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EXHIBIT A

02/02/17 15:29:31 PROFORMA STATEMENT FOR MATTER 375579-00002 (Krista Freitag, as Receiver for Pension Funding LLC and) (General Receivership)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 375579-00002

Matter Name: General Receivership

Date of Last Billing: 01-27-2017

Client Name: Krista Freitag, as Receiver for Pension Funding LLC and

Proforma Number 1302297

Client/Matter Joint Group # 375579-1

Fees for Matter 375579-00002 (General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
11/28/16	7033354	Review Belth blog post regarding case and receivership and advise Receiver regarding same.	Fates, Edward	0.3	155.25	155.25

Disbursements for Matter 375579-00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt
10/05/16	2282145	Document Search - - Pacer Service 07/01/2016-09/30/2016^2505376	1.00	42.80
10/05/16	2282261	Document Search - - Pacer Service 07/01/2016-09/30/2016^4406104	1.00	6.10
10/07/16	2273533	Service of Process - - JPMorgan Chase Bank, N.A. Subpoena review, customer/accounting searching, locating/ordering documents; copies of subpoenaed documents	1.00	79.19
10/17/16	2273930	Duplication	4.00	0.76
10/17/16	2273931	Reprographics - Color	6.00	1.50
10/18/16	2275557	Service of Process - - JPMorgan Chase Bank, N.A. Research: subpoena review, customer/account searching, locating/ordering documents	1.00	135.28
10/19/16	2273929	Duplication	33.00	6.27

02/02/17 15:29:31 PROFORMA STATEMENT FOR MATTER 375579-00002 (Krista Freitag, as Receiver for Pension Funding LLC and) (General Receivership)

Trans Date	Index	Type	Quantity	Amt
10/19/16	2278174	Messenger -- Federal Express Invoice No: 559283292 1665 Ship To: Hon Josephine L Staton	1.00	10.95
10/24/16	2276861	Reprographics - Color	7.00	1.75
11/11/16	2281874	Messenger -- Federal Express Invoice No: 561623803 1665 Ship To: Hon Josephine L Staton	1.00	10.98
12/07/16	2288871	Duplication	112.00	21.28
12/07/16	2289873	Messenger -- Federal Express Invoice No: 564508995 1665 Ship To: Hon Josephine L Staton	1.00	11.47
12/09/16	2289462	Duplication	111.00	21.09
12/09/16	2289872	Messenger -- Federal Express Invoice No: 564508995 1665 Ship To: Hon Josephine L Staton	1.00	11.04
12/09/16	2290846	Parking fees at Santa Ana courthouse for hearing. -- USDC-Central District	1.00	3.00
12/22/16	2299065	Messenger -- Nationwide - USDC/SANTA ANA, ^COPIES TO JUDGE JOSEPHINE STANTON TODAY BEFORE - 262410	1.00	30.10
12/27/16	2294795	Duplication	105.00	19.95
12/27/16	2295694	Messenger Invoice No: 566092466 Paid to: Fedex per 001938 Ship To: Attn Clerk s Office Ship Dt: 12/27/16 Airbill: 785147097848.	1.00	18.19
12/27/16	2295695	Messenger Invoice No: 566092466 Paid to: Fedex per 001938 Ship To: Attn Clerk s Office Ship Dt: 12/27/16 Airbill: 785147261989	1.00	16.14

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward Fates	0.3	517.50	155.25
		0.3		155.25
Total Fees				155.25

02/02/17 15:29:31 PROFORMA STATEMENT FOR MATTER 375579-00002 (Krista Freitag, as Receiver for Pension Funding LLC and) (General Receivership)

Total Disbursements

447.84

02/02/17 15:29:31 PROFORMA STATEMENT FOR MATTER 375579-00003 (Krista Freitag, as Receiver for Pension Funding LLC and) (Asset Investigation)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 375579-00003

Matter Name: Asset Investigation

Date of Last Billing: 01-27-2017

Client Name: Krista Freitag, as Receiver for Pension Funding LLC and

Proforma Number 1302298

Client/Matter Joint Group # 375579-1

Fees for Matter 375579-00003 (Asset Investigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
10/03/16	6987390	Correspond with Tom Feher re status of Barnett settlement agreement with PI (.2); correspond with Tom Rossback re status of Lemka position on pension income payments (.2).	Kim, Yale	0.4	219.60	219.60
10/05/16	6989516	Review status of Receiver claim in Heald bankruptcy and classification of claim.	Kim, Yale	0.2	109.80	329.40
10/11/16	6994165	Correspond with Receiver re status of Lemka pensioners payments to receivership estate (.2); review status of Lemka chapter 13 case and calculate claim amount (.2); draft memo to Receiver re status of Heald claim in bankruptcy and claim amount sought under BPPA (.2); review Heald BPPA and amount paid to PI (.2); draft update to Receiver chart re Lemka payments (.2); draft updates to Receiver chart re Barnett, Iglehart, and Walton (.3); review claim amount against Rydberg under BPPA (.2); review Walton BPPA and amount paid to PI (.2).	Kim, Yale	1.7	933.30	1,262.70

02/02/17 15:29:31 PROFORMA STATEMENT FOR MATTER 375579-00003 (Krista Freitag, as Receiver for Pension Funding LLC and) (Asset Investigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
10/12/16	6995637	Review Receiver chart re status of pending chapter 13 pensioner bankruptcy cases and pending claim amounts.	Kim, Yale	0.3	164.70	1,427.40
10/13/16	7010651	Review records produced by Chase in response to subpoena and provide update to Receiver's staff re: the same (0.3).	Hsu, Tim	0.3	122.85	1,550.25
10/14/16	6997455	Telephone call with Chapter 13 trustee office for Baker pensioner bankruptcy and status of chapter 13 payments and judgment payoff (.2); correspond with Receiver re refund on overpayments to pensioners and Lemkas' payments (.2); review and update Receiver chart (.2).	Kim, Yale	0.6	329.40	1,879.65
10/17/16	6998658	Review Salisbury claim amount and adjustment based on lump-sum advance and Receiver chart revision (.2); review Atkins claim amounts and adjustment based on lump-sum advance and Receiver chart revision (.4); correspond with Ed Rossback re status of Lemkas contacting Receiver to discuss payment on claim (.2); draft update to Receiver chart re status of pensioner Heald bankruptcy proceedings (.5); review status of Seiger pensioner bankruptcy (.2); review status of Charplivy claim amount and update Receiver chart (.2); review status of Barnett claim amount and update Receiver chart (.2); review entry of discharge for Lucas and update Receiver chart (.2).	Kim, Yale	2.1	1,152.90	3,032.55

02/02/17 15:29:31 PROFORMA STATEMENT FOR MATTER 375579-00003 (Krista Freitag, as Receiver for Pension Funding LLC and) (Asset Investigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
10/21/16	7003287	Review payee schedule for chapter 13 distributions for Salisbury case (.1); review status of Atkins chapter 13 plan distributions (.1).	Kim, Yale	0.2	109.80	3,142.35
10/24/16	7004037	Review updated chart on status of pensioner bankruptcies and collections on receivership claims (.2); correspond with Krista Freitag re status of Bokenkamp closing of chapter 7 case and entry of discharge (.2); review entry of Lucas discharge (.1).	Kim, Yale	0.5	274.50	3,416.85
10/26/16	7006644	Draft memo to Receiver re follow-up on Heald bankruptcy re claims bar date and proposed plan distribution to unsecured creditors (.2); review Heald BPPA and payment distribution (.1).	Kim, Yale	0.3	164.70	3,581.55
10/28/16	7008758	Review status of Receiver recommendation to Court re setting of claim amount of receivership estate against pensioners under BPPAs (.2); draft memo to Ed Rossback re follow-up on Lemkas pensioner claim inquiry (.1).	Kim, Yale	0.3	164.70	3,746.25
10/31/16	7010442	Correspond with Ed Rossback re status of Lemka pensioner claim and payment outside of plan.	Kim, Yale	0.2	109.80	3,856.05
11/01/16	7013889	Review status of chapter 13 plan administration of Vroonland pensioner bankruptcy case.	Kim, Yale	0.2	109.80	3,965.85
11/02/16	7014395	Correspond with Krista Freitag re Lucas pensioner discharge.	Kim, Yale	0.2	109.80	4,075.65

02/02/17 15:29:31 PROFORMA STATEMENT FOR MATTER 375579-00003 (Krista Freitag, as Receiver for Pension Funding LLC and) (Asset Investigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
11/03/16	7015483	Draft update to pensioner bankruptcy chart re status of claims and chapter 13 administration (.2); review status of Charpliw and Heald pensioner bankruptcies (.3); review order confirming chapter 13 plan of Heald (.1).	Kim, Yale	0.6	329.40	4,405.05
11/07/16	7018403	Request access to chapter 13 plan distributions for trustees for Salisbury, Atkins, Baker and Charpliw cases.	Kim, Yale	0.4	219.60	4,624.65
11/08/16	7019998	Correspond with Hung Ng re access to chapter 13 trustee distributions for Baker case (.2); review status of Charpliw chapter 13 case (.1); review national data center information on chapter 13 plan payments and claims for Atkins and Salisbury (.2).	Kim, Yale	0.5	274.50	4,899.15
11/10/16	7021972	Review chapter 13 trustee account ledger, claim summary, and step payments for Salisbury chapter 13 case (.2); review chapter 13 trustee account ledger, claim summary, and step payments for Atkins chapter 13 case (.2).	Kim, Yale	0.4	219.60	5,118.75
11/14/16	7024259	Correspond with Hung Ng of chapter 13 trustee office re webaccess for Andre Banker claim (.2); review PI proof of claim filing in Baker (.1).	Kim, Yale	0.3	164.70	5,283.45
11/16/16	7027356	Advise regarding bar date for proofs of claim in Heald bankruptcy and pending recommendation regarding collection of lump sum.	Fates, Edward	0.2	103.50	5,386.95

02/02/17 15:29:31 PROFORMA STATEMENT FOR MATTER 375579-00003 (Krista Freitag, as Receiver for Pension Funding LLC and) (Asset Investigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
11/16/16	7027317	Review status of Heald bankruptcy and claims review for pensioner case (.2); review Johnston chapter 13 discharge order (.1); correspond with Krista Freitag re entry of discharge and prohibition against receivership claims against Johnstons (.2).	Kim, Yale	0.5	274.50	5,661.45
11/18/16	7029344	Correspond with Receiver re status of Baker distribution and preparation of amended proof of claim to update PI payment address (.2); review chapter 13 trustee web access for payment of receivership claim re Baker (.1); review status of chapter 13 trustee plan distributions on Atkins (.1); review status of chapter 13 trustee plan distributions on Salisbury (.1).	Kim, Yale	0.5	274.50	5,935.95
11/22/16	7031475	Review status of Baker chapter 13 plan distributions and Receiver authorization for preparation of amended proof of claim (.2); review Baker original proof of claim filed for PI (.2).	Kim, Yale	0.4	219.60	6,155.55
11/23/16	7032718	Review Atkins chapter 13 plan distributions and status of distributions on receivership claim (.2); review PI judgment in Baker case (.1); draft attachment to amended proof of claim in Baker (1.2).	Kim, Yale	1.5	823.50	6,979.05
11/28/16	7034022	Review notice of pensioner's bankruptcy and discuss same with Receiver.	Fates, Edward	0.2	103.50	7,082.55
11/29/16	7035365	Review status of Heald and Chrapliwy	Kim, Yale	0.2	109.80	7,192.35

02/02/17 15:29:31 PROFORMA STATEMENT FOR MATTER 375579-00003 (Krista Freitag, as Receiver for Pension Funding LLC and) (Asset Investigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		pensioner bankruptcies in Middle District North Carolina.				
12/01/16	7040044	Review Receiver approval of amended proof of claim in Baker pensioner case (.2); review amended proof of claim in Baker and attachment (.1); review status of Atkins and Salisbury chapter 13 cases and payment distributions (.2).	Kim, Yale	0.5	274.50	7,466.85
12/07/16	7044186	Correspond with Receiver re approval of amended proof of claim in Baker pensioner bankruptcy case (.2); finalize amended proof of claim for Baker (.1).	Kim, Yale	0.3	164.70	7,631.55
12/08/16	7045920	Draft letter to clerk of bankruptcy court for District of Oregon re receivership filing of proof of claim in Andre Baker case.	Kim, Yale	0.2	109.80	7,741.35
12/12/16	7047735	Review re District Court approval of Receiver recommendation for recovery of lump-sum payment rather than pension income stream.	Kim, Yale	0.2	109.80	7,851.15
12/14/16	7050627	Review Court order approving in part the receiver's report and recommendations entered on 12/14 (.2); review status of proofs of claim against pensioners and claim adjustments re lump sum payments (.2).	Kim, Yale	0.4	219.60	8,070.75
12/15/16	7051714	Work on letter to pensioners regarding court order and collection of lump sums and discuss same with Receiver.	Fates, Edward	0.3	155.25	8,226.00

02/02/17 15:29:31 PROFORMA STATEMENT FOR MATTER 375579-00003 (Krista Freitag, as Receiver for Pension Funding LLC and) (Asset Investigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
12/15/16	7051950	Review template amendment to proofs of claim for pensioner bankruptcies in light of order limiting pensioner collections to lump sums.	Fates, Edward	0.2	103.50	8,329.50
12/15/16	7051645	Draft attachment to Second Amended Proof of Claim for Salisbury pensioner case (1.4); draft second amended proof of claim for Salisbury (.2); review memo from Receiver re status of Baker amended claim (.1); draft memo to Receiver re Heald claim status in bankruptcy (.1); draft attachment to Second Amended Proof of Claim for Atkins pensioner case (1.4).	Kim, Yale	3.2	1,756.80	10,086.30
12/16/16	7052907	Advise on amendments to proofs of claim in pensioner bankruptcies based on limiting collections to lump sums advanced	Fates, Edward	0.2	103.50	10,189.80
12/19/16	7053636	Discuss strategy and steps re: pensioner collections/investigation with Receiver (.3) assist in drafting amendment to proof of claim for Baker bankruptcy (.2)	Fates, Edward	0.2	103.50	10,293.30
12/19/16	7053663	Review adjusted claim amounts for Chrapliwy, Baker, and Barnett (.3); review BPPAs for Chrapliwy, Baker, and Barnett (.3); correspond with Receiver re adjusted claim amounts (.4); review and revise amended claims for Salisbury and Atkins (.8); revise attachment to amended POC for Baker (.5); draft memo to Receiver re revised attachment to amended	Kim, Yale	2.5	1,372.50	11,665.80

02/02/17 15:29:31 PROFORMA STATEMENT FOR MATTER 375579-00003 (Krista Freitag, as Receiver for Pension Funding LLC and) (Asset Investigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		POC for Baker (.2).				
12/20/16	7054890	Finalize proofs of claim for Baker, Atkins, and Salisbury (.6); review memo from Receiver re final approval of same (.1); electronic filing and completion of proof of claim for Salisbury case in Northern District of Illinois (.3); draft memo to Michelle Mondroiu re second amended proof of claim (.2); draft memo to Receiver re same (.1).	Kim, Yale	1.3	713.70	12,379.50
12/21/16	7056440	Draft memo to Sandra Pillar re chapter 13 trustee's office re second amended claim in Salisbury case (.2); review chapter 13 trustee account ledger for Salisbury case (.1); review Barnett judgment and adjusted claim amount based on lump sum advance (.4); review original Chrapliwy proof of claim filed on 3/24/14 as Claim #9-1 (.2); review claims register and docket for Chrapliwy case (.2); review adjusted claim amount for Chrapliwy based on lump-sum advance (.1).	Kim, Yale	1.2	658.80	13,038.30
12/22/16	7057597	Review status of Atkins amended proof of claim (.1); draft Chrapliwy attachment to amended proof of claim (1.4); review Chrapliwy BPPA (.2); draft proof of claim form for Charpliw (2); assemble exhibits for attachment to Charpliw amended proof of claim (.3).	Kim, Yale	2.2	1,207.80	14,246.10
12/27/16	7058955	Finalize proof of claim for Baker case (.3); finalize transmittal letter re Baker to Clerk's Office for US Bankruptcy	Kim, Yale	2.2	1,207.80	15,453.90

02/02/17 15:29:31 PROFORMA STATEMENT FOR MATTER 375579-00003 (Krista Freitag, as Receiver for Pension Funding LLC and) (Asset Investigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		Court District of Oregon (.1); finalize proof of claim for Atkins case (.2); draft transmittal letter re Atkins to Clerk's Office for US Bankruptcy Court District of New Jersey (.2); draft memo to Mark Kriegel (debtor's counsel) re amended proof of claim in Atkins (.2); draft memo to Terry Smith (trustee's office) re amended proof of claim in Atkins (.1); draft memo to Receiver re filings of amended proofs of claim for Atkins, Baker, and Salisbury (.2); review Chrapliwy amended proof of claim (.2); draft memo to Receiver re proceeding with Chrapliwy amended proof of claim (.2); review and evaluate receivership estate claim against Barnett (.4); draft Krista Freitag re receivership claim against Barnett (.1).				
12/29/16	7062646	Correspond with Mark Kriegel re confirmation of filing of amended proof of claim and proceeding with amended plan.	Kim, Yale	0.2	109.80	15,563.70

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward Fates	1.3	517.50	672.75
001938	Yale Kim	26.9	549.00	14,768.10
002055	Tim Hsu	0.3	409.50	122.85
		<hr/> 28.5		<hr/> 15,563.70
Total Fees				15,563.70
Total Disbursements				0.00

02/02/17 11:21:13 PROFORMA STATEMENT FOR MATTER 375579-00004 (Krista Freitag, as Receiver for Pension Funding LLC and) (Reporting)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 375579-00004

Matter Name: Reporting

Date of Last Billing: 01-27-2017

Client Name: Krista Freitag, as Receiver for Pension Funding LLC and

Proforma Number 1302299

Client/Matter Joint Group # 375579-1

Fees for Matter 375579-00004 (Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
10/03/16	6988004	Call with counsel and follow-up to make recommendations as to structure of accounting (.3); Review/edit the draft of the Receiver's forensic report (.4).	Zaro, David	0.7	491.40	491.40
10/03/16	6987354	Discuss forensic accounting report with Receiver (.4); revisions to same (.8).	Fates, Edward	1.2	621.00	1,112.40
10/04/16	6988777	Review draft report and evaluate recommendation (.4). Conference call to review/revise draft report (1.0).	Zaro, David	1.4	982.80	2,095.20
10/04/16	6987720	Work on forensic accounting report and recommendations and discuss same with Receiver (1.7); call and emails with CFPB's counsel regarding report and recommendations (.2).	Fates, Edward	1.9	983.25	3,078.45
10/05/16	6989065	Revise and update forensic accounting report and recommendations and discuss same with Receiver.	Fates, Edward	2.2	1,138.50	4,216.95
10/06/16	6989868	Work on forensic accounting report and recommendations (1.1); communications with CFPB's counsel and New York Superintendent's	Fates, Edward	1.4	724.50	4,941.45

02/02/17 11:21:13 PROFORMA STATEMENT FOR MATTER 375579-00004 (Krista Freitag, as Receiver for Pension Funding LLC and) (Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		counsel regarding same (.3).				
10/12/16	6996222	Communications with CFPB's counsel and New York Superintendent's counsel regarding forensic accounting report.	Fates, Edward	0.1	51.75	4,993.20
10/17/16	6999042	Calls with counsel for New York Superintendent and Receiver regarding forensic accounting report and recommendations (.6); revisions to report (.3); draft notices to investors and pensioners (.2).	Fates, Edward	1.1	569.25	5,562.45
10/18/16	7000214	Final revisions to report and recommendations and discuss same with Receiver.	Fates, Edward	0.8	414.00	5,976.45
10/19/16	7000987	Communications with Receiver and counsel for New York Superintendent regarding hearing date change for forensic accounting report and recommendations (.2); prepare proposed order approving report and recommendations (.1).	Fates, Edward	0.3	155.25	6,131.70
11/04/16	7016903	Work on Receiver's Third Interim Report.	Fates, Edward	0.9	465.75	6,597.45
11/10/16	7021715	Communications with counsel for New York Superintendent and CFPB regarding Third Interim Report.	Fates, Edward	0.1	51.75	6,649.20
11/28/16	7033969	Communications with counsel for New York Superintendent and counsel for CFPB regarding December 9 hearing on forensic accounting report and recommendations.	Fates, Edward	0.2	103.50	6,752.70
11/30/16	7036383	Conference call with counsel for	Fates, Edward	0.4	207.00	6,959.70

02/02/17 11:21:13 PROFORMA STATEMENT FOR MATTER 375579-00004 (Krista Freitag, as Receiver for Pension Funding LLC and) (Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		CFPB, counsel for New York Superintendent, and Receiver regarding forensic accounting report and recommendations and December 9 hearing.				
12/09/16	7047396	Prepare for hearing on forensic accounting report and recommendations and discuss issues with Receiver (.9); attend hearing (.8); travel to and from courthouse (2.2).	Fates, Edward	3.9	2,018.25	8,977.95
12/14/16	7050617	Review order approving in part recommendations regarding lump sum collections and investor claims process and discuss same with Receiver (.6);	Fates, Edward	0.6	310.50	9,288.45

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	2.1	702.00	1,474.20
001665	Edward Fates	15.1	517.50	7,814.25
		<u>17.2</u>		<u>9,288.45</u>
Total Fees				9,288.45
Total Disbursements				0.00

02/02/17 11:21:13 PROFORMA STATEMENT FOR MATTER 375579-00006 (Krista Freitag, as Receiver for Pension Funding LLC and) (Claims & Distributions)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 375579-00006

Matter Name: Claims & Distributions

Date of Last Billing: 01-27-2017

Client Name: Krista Freitag, as Receiver for Pension Funding LLC and

Proforma Number 1302300

Client/Matter Joint Group # 375579-1

Fees for Matter 375579-00006 (Claims & Distributions)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
10/05/16	6988513	Respond to inquiry from counsel for investor regarding forensic accounting.	Fates, Edward	0.2	103.50	103.50
10/10/16	6993034	Advise Receiver regarding response to investor inquiry regarding distributions.	Fates, Edward	0.2	103.50	207.00
10/25/16	7005124	Review and discuss pensioner and investor inquiries with Receiver and advise regarding responses to same (.3); prepare responses to investor email inquiries regarding claims and distributions (.4); call with counsel for certain investors regarding claims process and timing of distributions (.3).	Fates, Edward	1.0	517.50	724.50
10/28/16	7008893	Call from investment advisor for investors regarding recommendations, claims, and distributions.	Fates, Edward	0.6	310.50	1,035.00
10/31/16	7010043	Respond to investor inquiries regarding forensic report and recommendations (.2); call with financial advisor for investors (.4).	Fates, Edward	0.6	310.50	1,345.50

02/02/17 11:21:13 PROFORMA STATEMENT FOR MATTER 375579-00006 (Krista Freitag, as Receiver for Pension Funding LLC and) (Claims & Distributions)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
11/16/16	7027364	Respond to investor inquiries regarding forensic accounting and recommendations.	Fates, Edward	0.2	103.50	1,449.00
11/30/16	7037757	Advise Receiver regarding response to investor inquiry.	Fates, Edward	0.2	103.50	1,552.50
12/07/16	7044233	Call from counsel for investor regarding claims process and timing (.2); assist Receiver in drafting response to investor inquiry (.3).	Fates, Edward	0.5	258.75	1,811.25
12/09/16	7046747	Advise Receiver as to response to specific investor inquiries.	Fates, Edward	0.2	103.50	1,914.75
12/12/16	7047975	Work on investor claims notice letter and letter advising pensioners regarding collection of lump sums (1.9); discuss same with Receiver (.2).	Fates, Edward	2.1	1,086.75	3,001.50
12/14/16	7051225	Work on frequently asked questions regarding investor claims process for receivership website.	Fates, Edward	0.4	207.00	3,208.50
12/14/16	7076864	Gather information regarding potential mediators for claims ADR process (.3); initial work on recommendation regarding same (.4).	Fates, Edward	0.7	362.25	3,570.75
12/15/16	7051656	Gather information regarding potential mediators for potential investor claim disputes (.4); work on notice letter and email notification to investors regarding order and claims process (.9); work on recommendation regarding ADR procedure for investor claim disputes (1.1).	Fates, Edward	2.4	1,242.00	4,812.75
12/16/16	7052929	Respond to communications from	Fates, Edward	0.2	103.50	4,916.25

02/02/17 11:21:13 PROFORMA STATEMENT FOR MATTER 375579-00006 (Krista Freitag, as Receiver for Pension Funding LLC and) (Claims & Distributions)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		counsel for investor group				
12/16/16	7053168	Work on ex parte application regarding approval of ADR procedure for investor claim disputes	Fates, Edward	0.9	465.75	5,382.00
12/19/16	7053695	Work on ex parte application re: mediation of unresolved investor claim disputes, gather information about proposed mediators, discuss same with Receiver	Fates, Edward	1.7	879.75	6,261.75
12/20/16	7055387	Communications with counsel for CFPB and NY Superintendent regarding recommendation for ADR procedure for disputed claims (.3) work on recommendation, gather information from potential mediators (1.4)	Fates, Edward	1.7	879.75	7,141.50
12/21/16	7056435	Revisions to ex parte application re: recommended ADR procedure (.7) prepare proposed order (.2) communications with counsel for CFPB and counsel for NY Superintendent re: same (.2)	Fates, Edward	1.1	569.25	7,710.75
12/27/16	7059711	Discuss Jasimeyer and agent claims with Receiver and L. Ryan (.4) assist with drafting claim notice letters to same (.5)	Fates, Edward	0.9	465.75	8,176.50

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward Fates	15.8	517.50	8,176.50
		15.8		8,176.50
Total Fees				8,176.50

02/02/17 11:21:13 PROFORMA STATEMENT FOR MATTER 375579-00006 (Krista Freitag, as Receiver for Pension Funding LLC and) (Claims & Distributions)

Total Disbursements

0.00

02/02/17 11:21:13 PROFORMA STATEMENT FOR MATTER 375579-00009 (Krista Freitag, as Receiver for Pension Funding LLC and)
(Employment/Fees)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 375579-00009

Matter Name: Employment/Fees

Date of Last Billing: 01-27-2017

Client Name: Krista Freitag, as Receiver for Pension Funding LLC and

Proforma Number 1302301

Client/Matter Joint Group # 375579-1

Fees for Matter 375579-00009 (Employment/Fees)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
10/19/16	7000966	Review order approving fee applications and advise Receiver regarding same.	Fates, Edward	0.2	103.50	103.50
11/30/16	7037196	Work on Receiver's third interim fee application.	Fates, Edward	1.1	569.25	672.75
11/30/16	7037889	Initial work on Allen Matkins third interim fee application.	Fates, Edward	0.2	103.50	776.25
12/01/16	7040072	Work on Receiver's third interim fee application (.4); work on Allen Matkins third interim fee application (.7).	Fates, Edward	1.1	569.25	1,345.50
12/02/16	7040504	Work on Allen Matkins third interim fee application (2.1); communications with counsel for CFPB and counsel for New York Superintendent regarding fee applications (.1).	Fates, Edward	2.2	1,138.50	2,484.00
12/07/16	7044131	Prepare proposed orders and notice of fee applications.	Fates, Edward	0.3	155.25	2,639.25

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward Fates	5.1	517.50	2,639.25

02/02/17 11:21:13 PROFORMA STATEMENT FOR MATTER 375579-00009 (Krista Freitag, as Receiver for Pension Funding LLC and)
(Employment/Fees)

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Total Fees	5.1	2,639.25
Total Disbursements		2,639.25
		0.00

02/02/17 15:29:31 PROFORMA STATEMENT FOR MATTER 375579-00500 (Krista Freitag, as Receiver for Pension Funding LLC and) (Write-Offs)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 375579-00500

Matter Name: Write-Offs

Date of Last Billing:

Client Name: Krista Freitag, as Receiver for Pension Funding LLC and

Proforma Number 1302370

Client/Matter Joint Group # 375579-1

Fees for Matter 375579-00500 (Write-Offs)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
10/04/16	6987874	Correspond with Jennyfer Utt and Tom Feher re settlement agreement for Barnett judgment (.2); review settlement agreement with Barnett (.2); draft memo to Receiver re Barnett settlement install payments (.1); review status of Lemkas bankruptcy and payment status on claim (.2); review Lemkas BPPA and claims based on lump-sum advance and pension income stream (.2); draft memo to Receiver re payments on Lemka receivership claim (.2); review status of receivership claim in Heald bankruptcy and claim classification (.2).	Kim, Yale	1.3	713.70	713.70
10/13/16	6997050	Review status of chapter 13 plan payments on Chrapliwy and status of administration of case (.2); review Receiver notice of change of address filing in Chrapliwy case and exhibits (.1); review status of Vroonland chapter 13 case (.1); telephone call with Andre Baker re status of chapter 13 plan distributions (.1); review Salisbury proof of claim and status of	Kim, Yale	0.9	494.10	1,207.80

02/02/17 15:29:31 PROFORMA STATEMENT FOR MATTER 375579-00500 (Krista Freitag, as Receiver for Pension Funding LLC and) (Write-Offs)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		chapter 13 plan distributions (.2); update Receiver chart (.2).				
10/18/16	7000337	Draft updated chart re pensioner claim adjustments based on lump sum advance claim (.5); draft memo to Krista Freitag re same (.4).	Kim, Yale	0.9	494.10	1,701.90
10/25/16	7005480	Review docket re status of Lemka chapter 13 bankruptcy case (.1); review docket re status of Heald chapter 13 case (.1); review Heald plan and proposed order confirming plan (.2); review claims bar date for Heald case (.1).	Kim, Yale	0.5	274.50	1,976.40
11/04/16	7016871	Draft memo to Krista Freitag re plan confirmation order in Heald case (.1); review Heald plan confirmation order (.1); draft update to Receiver chart re claim against Lemkas (.1); review status of Rydberg claim and PACER check on bankruptcy filing (.2); review status of Walton claim and PACER check on bankruptcy filing (.2); draft status update on Chrapliwy bankruptcy (.1); review and complete website access agreement for chapter 13 trustee in Baker case (.2); draft memo to Wayne Godare, chapter 13 trustee re web access agreement for Baker case (.1); review status of Atkins claim and status of chapter 13 bankruptcy (.2); review status of Salisbury claim and status of chapter 13 bankruptcy (.2).	Kim, Yale	1.5	823.50	2,799.90
11/15/16	7025328	Review web access for Baker chapter 13 case (.2); review status of chapter 13 plan payments for Baker and	Kim, Yale	0.7	384.30	3,184.20

02/02/17 15:29:31 PROFORMA STATEMENT FOR MATTER 375579-00500 (Krista Freitag, as Receiver for Pension Funding LLC and) (Write-Offs)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		confession of judgment (.2); review Receiver chart update on Baker (.1); correspond with Receiver re status of claim payment and distribution on Baker case (.2).				
11/28/16	7033820	Revise attachment to amended proof of claim for Andre Baker (.4); draft proof of claim form (.6); draft memo to Receiver re review and approval of amended proof of claim for Baker (.1).	Kim, Yale	1.1	603.90	3,788.10
12/02/16	7040801	Finalize amended proof of claim for Baker case and assemble exhibits.	Kim, Yale	0.5	274.50	4,062.60
12/16/16	7052580	Revise Atkins attachment to amended proof of claim (.2); revise Salisbury attachment to second amended proof of claim (.1); draft Atkins proof of claim form (.2); draft memo to Receiver re review of Atkins amended proof of claim and Salisbury second amended proof of claim (.2); review status of claims against Charpliw, Baker, and Barnett (.3); draft memo to Receiver re review of lump sum advances and payments received for Charpliw, Baker, and Barnett (.1).	Kim, Yale	1.1	603.90	4,666.50

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001938	Yale Kim	8.5	549.00	4,666.50
		8.5		4,666.50
Total Fees				4,666.50
Total Disbursements				0.00