

DAVID R. ZARO (BAR NO. 124334)
 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
 E-Mail: dzaro@allenmatkins.com

EDWARD G. FATES (BAR NO. 227809)
 ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP
 One America Plaza
 600 West Broadway, 27th Floor
 San Diego, California 92101-0903
 Phone: (619) 233-1155
 Fax: (619) 233-1158
 E-Mail: tfates@allenmatkins.com

Attorneys for Receiver
 KRISTA L. FREITAG

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,
 Plaintiff,
 vs.

IMPETUS ENTERPRISE, INC., a
 California corporation, also d/b/a Aiding
 Student Relief, Aiding Students &
 Teachers, Aidnest, Avec Staffing, and
 National Education Student and Teacher;
 FIG TREE & CO., LLC, a California
 limited liability company, also d/b/a
 Aiding Student Relief, Aiding Students
 & Teacher, and Aiding Students &
 Teachers; TUAN DINH DUONG, a/k/a
 Thomas Duong, a/k/a Thomas Dinh,
 individually and as an officer of
 IMPETUS ENTERPRISE, INC.;
 BRENDA AVITIA-PENA, individually
 and as an officer of IMPETUS
 ENTERPRISE, INC. and FIG TREE &
 CO., LLC; and BRIAN COLOMBANA
 d/b/a FUTERO, individually and as an
 officer of FIG TREE & CO., LLC,

Defendants,
 NOEL SOLUTIONS, LLC, a Wyoming
 limited liability company,
 Relief Defendant.

Case No. 8:18-cv-01987-JLS-KES

**SECOND 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: June 7, 2019
 Time: 10:30 a.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 Impetus Enterprise, Inc. ("Impetus") and Fig Tree & Co., LLC ("Fig Tree"), each of
4 their subsidiaries, affiliates, successors and assigns, including but not limited to
5 Capital Sun Investments, LLC (d/b/a Studora) and Premier Capital Investments,
6 LLC ("Receivership Entities"), hereby submits this second interim application for
7 approval and payment of fees and reimbursement of expenses ("Application"). This
8 Application covers the period from January 1, 2019, through March 31, 2019
9 ("Second Application Period"), and seeks interim approval of \$6,820.65 in fees and
10 \$107.61 in expenses, and an order authorizing the Receiver to pay, on an interim
11 basis, 80% of the fees incurred (\$5,456.52) and 100% of the expenses incurred. As
12 it has throughout this case, Allen Matkins has discounted its customary hourly rates
13 by 10%.

14 I. INTRODUCTION

15 This equity receivership arises from the Complaint for Permanent Injunction
16 and Other Equitable Relief ("Complaint") (Dkt. No. 2) filed on November 6, 2018,
17 by the Federal Trade Commission ("FTC"). The Appointment Order confers full
18 powers of an equity receiver, including full power over all funds, assets, books,
19 records, and other real or personal property of the Receivership Entities. The
20 Appointment Order also authorizes the Receiver to "engage and employ attorneys,
21 accountants, appraisers, and other technical specialists" to assist her in the
22 performance of her duties. Dkt. 38, Section XIV(F).

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

II. FEE APPLICATION

This fee application should be read in conjunction with the Receiver's Third Interim Report ("Third Report") filed on April 29, 2019 (Dkt. No. 87), which describes in detail the Receiver's activities during the Second Application Period. This Application seeks interim approval of \$6,820.65 in fees for a total of 12.4 hours worked and payment on an interim basis of 80% of that amount, or \$5,456.52. The work performed is described task-by-task on Exhibit A and is broken down into the following categories:

Category	Hours	Amount
General Receivership	3.5	\$1,968.75
Asset Investigation & Recovery	5.6	\$2,995.65
Reporting	3.1	\$1,743.75
Claims & Distributions	0.2	\$112.50
Total Fees	12.40	\$6,820.65

Allen Matkins has worked diligently and efficiently to assist the Receiver with urgent legal issues facing the receivership estate. 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

This category includes Allen Matkins' work to advise the Receiver regarding the ongoing litigation between the FTC and Defendants, respond to inquiries from state regulatory agencies in New York and California, and address tax issues for the Receivership Entities. The reasonable and necessary fees for work in this category total \$1,968.75.

2. Asset Investigation & Recovery

Allen Matkins' time in this category focused on assisting the Receiver in investigating assets of the Receivership Entities, including notifying third parties of the Preliminary Injunction Order, communicating with third parties and their legal counsel about preserving assets and data of the Receivership Entities, providing the Receiver with access to the same, and turning over account balances and other assets belonging to the Receivership Entities. The reasonable and necessary fees for work in this category total \$2,995.65.

3. Reporting

Allen Matkins' time in this category focused on preparing the Receiver's Second Interim Report ("Second Report"), which was filed on January 14, 2019. Dkt. No. 44. The Second Report contains a detailed description of the Receiver's actions to implement the Court's orders, including cash recovered, a preliminary assessment of the Receivership Entities' operations, the scope of the enterprise, pending litigation matters, and consumer communications. The report also includes the Receiver's recommendations for the continued administration of the receivership estate. The reasonable and necessary fees for this work total \$1,743.75.

4. Claims and Distributions

Allen Matkins' time in this category focused on responding to direct inquiries from consumers. The reasonable and necessary fees for work in this category total \$112.50.

B. Summary of Expenses Requested for Reimbursement

Allen Matkins requests the Court approve reimbursement of \$904.00 in out-of-pocket costs. The itemization of such expenses is summarized below by category. The costs incurred by Allen Matkins during the Second Application Period are broken down by category as follows:

Category	Total
Production of Documents	\$22.81
Court Filing Fees/Recorder Fees/Secretary of State Fees (including associated messenger fees for delivery of documents)	\$84.80
TOTAL	\$ 107.61

IV. EVIDENCE OF RATES FOR RECEIVER'S COUNSEL

As part of its Superseding Second Preliminary Injunction entered on April 2, 2019, the Court directed the Receiver's counsel to provide competent evidence supporting the rates billed for its time. Dkt. 68, Part XX. Accordingly, the following chart reflects rates charged by counsel for receivers in federal receivership cases in this District and the Southern District of California that have been approved after application to the Court:

Case	Court and Case No.	Receiver's Counsel	Hourly Rates	Docket Nos.
SEC v. Lambert Van Tuig, et al.	U.S.D.C., Central District of California, Case No. 8:06-cv-00172-AHS-MLG	Sheppard, Mullin, Richter & Hampton LLP	\$195 to \$520	844 and 864
SEC v. Newpoint Financial Services, Inc., et al.	U.S.D.C., Central District of California, Case No 2:10-cv-00124-DDP-JEM	Ervin Cohen & Jessup LLP	\$220 to \$500	535 and 540
SEC v. Learn Waterhouse, Inc., et al.	U.S.D.C., Southern District of California, Case No, 3:04-cv-02037-W-DHB	Ervin Cohen & Jessup LLP	\$235 to \$575	729 and 732
FTC v. American Tax Relief LLC, et al.	U.S.D.C., Central District of California, Case No 2:11-cv-06397-DSF-E	Loeb & Loeb	\$435 to \$650	480 and 495

SEC v. Titanium Blockchain Infrastructure Services Inc., et al.	U.S.D.C., Central District of California, 2:18-cv-04315-DSF- JPR	Holland & Knight	\$276.25 to \$722.50	76 and 80
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Accordingly, Allen Matkins' hourly rates, which range from \$351.00 to \$742.50, with a blended hourly rate of \$550.05 for this fee application (and only 0.2 hours billed at the \$742.50 rate), are fair and reasonable in relation to the rates approved for receiver's counsel in similar matters in Southern California.

The Receiver and Allen Matkins are mindful of the Court's comments in its recent order approving the First Interim Fee Applications of the Receiver and Allen Matkins (Dkt. 89) – specifically, that the Court expects more routine legal tasks to be delegated to associates going forward. This is always the objective as Allen Matkins uses junior attorneys and paralegals as much as possible in order to reduce fees. In this instance, however, given the limited hours billed (12.4 hours total) and tasks performed during the three-month Second Application Period, it would not have been feasible or efficient to delegate more tasks to associate attorneys. Moreover, as the bills attached as Exhibit A reflect, more routine tasks such as issuing subpoenas and ensuring compliance therewith, although very limited in this instance, were delegated to a junior associate (Norman Aspis).

V. 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, including Allen Matkins. Decisions regarding the timing and amount of an award of fees and costs to the Receiver and his Professionals are committed to the sound

1 discretion of the Court. See *SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992)
2 (rev'd in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).

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

18 As a preliminary matter, the Appointment Order confers on the Receiver
19 substantial duties and powers, including to conduct such investigation and discovery
20 as is necessary to locate and account for all receivership assets, take such action as is
21 necessary and appropriate to assume control over and preserve receivership assets,
22 and employ attorneys and others to investigate and, where appropriate, institute,
23 pursue, and prosecute all claims and causes of action of whatever kind and nature.
24 See Appointment Order, Section III. The Receiver promptly determined that
25 experienced, qualified counsel was necessary due to the complexity of legal issues
26 facing the receivership estate.

27 Allen Matkins has submitted a detailed fee application, which describes the
28 nature of the services rendered, and the identity and billing rate of each individual

1 performing each task. *See* Exhibit A. Allen Matkins has endeavored to staff matters
 2 as efficiently as possible while remaining cognizant of the complexity of issues.
 3 The request for fees is based on Allen Matkins' customary billing rates charged for
 4 comparable services provided in other matters, less a 10% discount.

5 The work performed by Allen Matkins was essential to carrying out the
 6 Receiver's Court-ordered duties. The Receiver and Allen Matkins have worked
 7 diligently since the Receiver's appointment to preserve and protect the assets of the
 8 receivership estate and to investigate and recover sums held by or transferred to
 9 third parties. Moreover, Allen Matkins seeks payment of only 80% of fees incurred
 10 on an interim basis in recognition of the fact that its work in assisting the Receiver is
 11 ongoing. Payment of the proposed 20% holdback will be sought at the conclusion
 12 of the receivership. Allen Matkins' fees are fair and reasonable and should be
 13 approved and paid on an interim basis.

14 VI. CONCLUSION

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

- 16 1. Approving Allen Matkins' fees, on an interim basis, of \$6,820.65;
- 17 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
 18 \$5,456.52, from the assets of the Receivership Entities;
- 19 3. Approving Allen Matkins' costs in the amount of \$107.61 and
 20 authorizing and directing the Receiver to reimburse such costs in full; and
- 21 4. For such other and further relief as the Court deems appropriate.

22
 23 Dated: May 2, 2019

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

By: /s/ Edward Fates

EDWARD G. FATES
 Attorneys for Receiver
 KRISTA L. FREITAG

EXHIBIT A

04/18/19 08:21:22 PROFORMA STATEMENT FOR MATTER 378119-00002 (Krista Freitag, as Receiver for Impetus Enterprise, Inc.) (General Receivership)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 378119-00002

Matter Name: General Receivership

Date of Last Billing:

Client Name: Krista Freitag, as Receiver for Impetus Enterprise, Inc.

Proforma Number 1412398

Client/Matter Joint Group # 378119-1

Fees for Matter 378119-00002 (General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
01/03/19	7712294	Review FTC motion for temporary stay and advise Receiver regarding same.	Fates, Edward	0.2	112.50	112.50	WO HD TR_____
02/01/19	7741234	Call/emails with NY Attorney General consumer fraud division regarding consumer complaints and receivership.	Fates, Edward	0.6	337.50	450.00	WO HD TR_____
02/05/19	7743184	Review FTC motion to amend complaint and advise Receiver regarding same.	Fates, Edward	0.4	225.00	675.00	WO HD TR_____
02/21/19	7757628	Respond to inquiry from Orange County DA, Consumer Protection Unit regarding consumer complaint.	Fates, Edward	0.4	225.00	900.00	WO HD TR_____
02/28/19	7763770	Review FTC initial disclosures and advise Receiver regarding same.	Fates, Edward	0.2	112.50	1,012.50	WO HD TR_____
03/07/19	7772713	Advise Receiver regarding call for testimony for FTC/Duong contempt hearing and preparation for same.	Fates, Edward	0.3	168.75	1,181.25	WO HD TR_____
03/08/19	7773908	Review correspondence from FTC and advise Receiver regarding Rule 26 document production.	Fates, Edward	0.2	112.50	1,293.75	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
03/12/19	7776825	Advise Receiver and L. Ryan on issues relating to receivership entity tax returns.	Fates, Edward	0.4	225.00	1,518.75	WO HD TR_____
03/14/19	7778942	Communications with L. Ryan regarding issues with receivership entity tax returns.	Fates, Edward	0.3	168.75	1,687.50	WO HD TR_____
03/26/19	7789035	Advise Receiver regarding FTC/Duong joint stay request in related contempt action.	Fates, Edward	0.2	112.50	1,800.00	WO HD TR_____
03/27/19	7790211	Review FTC's changes to superseding PI Order and advise Receiver regarding same.	Fates, Edward	0.3	168.75	1,968.75	WO HD TR_____

Disbursements for Matter 378119-00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	Circle Action
01/14/19	2497306	Messenger -- Federal Express - - Nationwide Legal, LLC, USDC/SANTA ANA, DELIVER COURTESY^186471	1.00	31.10	WO HD TR_____
01/16/19	2497019	Production of Documents - - GoDaddy, Cost of Production^11619	1.00	22.81	WO HD TR_____
01/29/19	2501194	Messenger - - Nationwide Legal, LLC, USDC/SANTA ANA, PLEASE DELIVER CC^187273	1.00	53.70	WO HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward Fates	3.5	562.50	1,968.75
		3.5		1,968.75
Total Fees				1,968.75
Total Disbursements				107.61

Attorney Billing Instructions

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

Billing Instructions

EXPIRES 12/31/2019: 10% OFF STANDARD RATES; NO TEXT EDITING; COPIES .10; NO CONFERENCE CALLS
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Account Summary- As Of 03/31/2019

Fiscal YTD				Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	11,245.96	10,166.85	1,079.11	2,076.36	1,968.75	107.61	2,076.36	1,968.75	107.61
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
<i>WIP Balance</i>	<i>13,119.90</i>	<i>12,023.10</i>	<i>1,096.80</i>						
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>						
<i>Unalloc Payment</i>	<i>0.00</i>								
<i>Client Trust Balance</i>	<i>0.00</i>								

Billing Address

Krista Freitag, as Receiver for Impetus Enterprise, Inc.
 E3 Advisors
 401 W. 'A' Street, Suite 1830
 San Diego, CA 92101
 ATTN:

04/18/19 08:21:22 PROFORMA STATEMENT FOR MATTER 378119-00003 (Krista Freitag, as Receiver for Impetus Enterprise, Inc.) (Asset Investigation & Recovery)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 378119-00003

Matter Name: Asset Investigation & Recovery

Date of Last Billing:

Client Name: Krista Freitag, as Receiver for Impetus Enterprise, Inc.

Proforma Number 1412399

Client/Matter Joint Group # 378119-1

Fees for Matter 378119-00003 (Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
01/03/19	7712686	Follow up communications with customer software hosting company regarding access to company account and related data.	Fates, Edward	0.3	168.75	168.75	WO HD TR_____
01/07/19	7714261	Further follow up with counsel for software hosting company regarding access to account data.	Fates, Edward	0.2	112.50	281.25	WO HD TR_____
01/08/19	7718745	Analysis of the Receiver's investigation and reporting (.2).	Zaro, David	0.2	148.50	429.75	WO HD TR_____
01/08/19	7716388	Work on letter to Pipedrive regarding access to company online accounts and data, discuss same and response from Zoho with Receiver.	Fates, Edward	0.9	506.25	936.00	WO HD TR_____
01/11/19	7719067	Communications with counsel for Zoho regarding Receiver access to account information (.2); advise regarding follow up steps regarding document subpoena to GoDaddy.com (.2).	Fates, Edward	0.4	225.00	1,161.00	WO HD TR_____
01/11/19	7720048	Draft email to GoDaddy.com, LLC demanding compliance with our subpoena by January 17, 2019.	Aspis, Norman	0.3	105.30	1,266.30	WO HD TR_____

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
01/17/19	7724707	Further communications with counsel for Zoho regarding failure to provide account information (.2); review documents produced by GoDaddy and discuss same with Receiver (.4).	Fates, Edward	0.6	337.50	1,603.80	WO HD TR_____
01/17/19	7739284	Review and transmit subpoena response from GoDaddy.	Aspis, Norman	0.4	140.40	1,744.20	WO HD TR_____
01/24/19	7729901	Further follow up with counsel for Zoho regarding access to account information (.2) advise Receiver re: steps to secure email data (.2)	Fates, Edward	0.4	225.00	1,969.20	WO HD TR_____
02/01/19	7741235	Advise Receiver regarding credit card chargeback dispute process and recovery of additional funds.	Fates, Edward	0.2	112.50	2,081.70	WO HD TR_____
02/04/19	7741590	Follow up communications with counsel for Zoho regarding account data.	Fates, Edward	0.2	112.50	2,194.20	WO HD TR_____
02/14/19	7752739	Advise Receiver on case strategy and outstanding investigative tasks.	Fates, Edward	0.2	112.50	2,306.70	WO HD TR_____
03/11/19	7775033	Initial review of initial disclosure documents produced by FTC (.7); discuss same with Receiver (.2).	Fates, Edward	0.9	506.25	2,812.95	WO HD TR_____
03/21/19	7794058	Confer with counsel regarding GoDaddy subpoena production of usdebtreief.us.	Aspis, Norman	0.2	70.20	2,883.15	WO HD TR_____
03/22/19	7787038	Analyze documentation from GoDaddy regarding usdebtreief.com website.	Fates, Edward	0.2	112.50	2,995.65	WO HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David Zaro	0.2	742.50	148.50
001665	Edward Fates	4.5	562.50	2,531.25
002369	Norman Aspis	0.9	351.00	315.90
		5.6		2,995.65
Total Fees				2,995.65
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

EXPIRES 12/31/2019: 10% OFF STANDARD RATES; NO TEXT EDITING; COPIES .10; NO CONFERENCE CALLS

Account Summary- As Of 03/31/2019

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	14,477.40	14,477.40	0.00	2,995.65	2,995.65	0.00	2,995.65	2,995.65	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
WIP Balance	15,152.40	15,152.40	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

Krista Freitag, as Receiver for Impetus Enterprise, Inc.
E3 Advisors

401 W. 'A' Street, Suite 1830
San Diego, CA 92101
ATTN:

04/18/19 08:21:22 PROFORMA STATEMENT FOR MATTER 378119-00004 (Krista Freitag, as Receiver for Impetus Enterprise, Inc.) (Reporting)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 378119-00004

Matter Name: Reporting

Date of Last Billing:

Client Name: Krista Freitag, as Receiver for Impetus Enterprise, Inc.

Proforma Number 1412400

Client/Matter Joint Group # 378119-1

Fees for Matter 378119-00004 (Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
01/03/19	7712879	Discuss scope and content for Receiver's 2nd interim report with Receiver.	Fates, Edward	0.4	225.00	225.00	WO HD TR_____
01/08/19	7716383	Discuss content, timing, and strategy for 2nd interim report with Receiver.	Fates, Edward	0.4	225.00	450.00	WO HD TR_____
01/11/19	7719965	Work on Receiver's 2nd interim report (1.8); discuss same with Receiver (.4); meet and confer communications with FTC counsel (.1).	Fates, Edward	2.3	1,293.75	1,743.75	WO HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward Fates	3.1	562.50	1,743.75
		3.1		1,743.75
Total Fees				1,743.75
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

EXPIRES 12/31/2019: 10% OFF STANDARD RATES; NO TEXT EDITING; COPIES .10; NO CONFERENCE CALLS

Account Summary- As Of 03/31/2019

Fiscal YTD				Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	4,612.50	4,612.50	0.00	1,743.75	1,743.75	0.00	1,743.75	1,743.75	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
<i>WIP Balance</i>	<i>4,612.50</i>	<i>4,612.50</i>	<i>0.00</i>						
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>						
<i>Unalloc Payment</i>	<i>0.00</i>								
<i>Client Trust Balance</i>	<i>0.00</i>								

Billing Address

Krista Freitag, as Receiver for Impetus Enterprise, Inc.
 E3 Advisors
 401 W. 'A' Street, Suite 1830
 San Diego, CA 92101
 ATTN:

04/18/19 08:21:22 PROFORMA STATEMENT FOR MATTER 378119-00006 (Krista Freitag, as Receiver for Impetus Enterprise, Inc.) (Claims & Distributions)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 378119-00006

Matter Name: Claims & Distributions

Date of Last Billing:

Client Name: Krista Freitag, as Receiver for Impetus Enterprise, Inc.

Proforma Number 1412401

Client/Matter Joint Group # 378119-1

Fees for Matter 378119-00006 (Claims & Distributions)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
03/19/19	7782575	Respond to direct inquiry from consumer.	Fates, Edward	0.2	112.50	112.50	WO HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward Fates	0.2	562.50	112.50
		0.2		112.50
Total Fees				112.50
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

EXPIRES 12/31/2019: 10% OFF STANDARD RATES; NO TEXT EDITING; COPIES .10; NO CONFERENCE CALLS
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Account Summary- As Of 03/31/2019

Fiscal YTD

Calendar YTD

LTD

	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	1,631.25	1,631.25	0.00	112.50	112.50	0.00	112.50	112.50	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

	<i>Total</i>	<i>Fees</i>	<i>Cost</i>
WIP Balance	1,631.25	1,631.25	0.00
AR Balance	0.00	0.00	0.00
Unalloc Payment	0.00		
Client Trust Balance	0.00		

Billing Address

Krista Freitag, as Receiver for Impetus Enterprise, Inc.
E3 Advisors
401 W. 'A' Street, Suite 1830
San Diego, CA 92101
ATTN: