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10 Attorneys for Court-Appointed Receiver
11 KRISTA L. FREITAG

12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA

14 FEDERAL TRADE COMMISSION,
15 Plaintiff,
16 vs.

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

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

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

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

Date: October 23, 2020
Time: 10:30 a.m.
Ctvm: 10A
Judge: Hon. Josephine L. Staton

1 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), general
2 counsel to Krista L. Freitag ("Receiver"), the Court-appointed receiver for Impetus
3 Enterprise, Inc. ("Impetus") and Fig Tree & Co., LLC ("Fig Tree"), each of their
4 subsidiaries, affiliates, successors and assigns, including but not limited to Capital
5 Sun Investments, LLC (d/b/a Studora) and Premier Capital Investments, LLC
6 ("Receivership Entities"), hereby submits this final application for approval and
7 payment of fees and reimbursement of expenses ("Application"). The Receiver's
8 Motion to Conclude the Receivership ("Motion to Conclude") was filed on June 26,
9 2020 (Dkt. No. 136). This Application is filed concurrently with the Receiver's final
10 fee application.

11 Allen Matkins seeks approval of the total fees and costs incurred by the firm
12 for the receivership in the amount of \$58,128.91, which includes the following:

- 13 • Approval and payment of fees and costs incurred from July 1, 2019
14 through June 26, 2020 ("Final Application Period") of \$8,558.55 and
15 \$59.30;
- 16 • Final approval of the firm's three interim fee applications¹ and of the
17 \$37,573.70 (\$35,749.44 of fees and \$1,824.26 of expenses) previously
18 paid in connection with those applications;
- 19 • Approval and payment of fees held back from Allen Matkins' three
20 interim fee applications in the total amount of \$8,937.36 ("Holdback
21 Amount"); and
- 22 • Approval of estimated fees and costs of up to \$3,000 for remaining legal
23 work to conclude the receivership.²

24
25 ¹ Allen Matkins' three interim fee applications, along with bills reflecting the work
26 performed during each period can be found at Dkt. Nos. 47, 91, and 113 and are
incorporated herein by this reference.

27 ² This estimates of fees for remaining work assumes that the Motion to Conclude
28 will be unopposed and approved by the Court without a hearing. If either turns
out not to be the case, an adjustment to the estimate may need to be made.

1 **I. INTRODUCTION**

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

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

16 Allen Matkins has diligently assisted the Receiver in carrying out her Court-
17 ordered duties since her appointment on November 6, 2018. The Receiver, with
18 Allen Matkins' assistance, has completed her Court-ordered duties, including
19 securing, preserving and protecting the Receivership Entities' assets and investigating
20 potential additional sources of recovery. The Receiver and Allen Matkins have filed
21 detailed reports on all activities and have also filed interim fee applications,
22 including a hold back of 20% of fees incurred from each application; all of the
23 interim fee applications have been granted.

24 With respect to projected fees and costs for remaining work, the legal work
25 necessary to conclude the receivership includes assisting with the turnover of
26 Receivership Entity documents, the turnover of remaining funds to the Commission,
27 communications with counsel for the IRS and the Commission, and a small
28 contingency for unanticipated legal issues that may arise during the wrap-up process.

1 Accordingly, Allen Matkins requests final approval of its total fees and costs
 2 for the receivership in the amount of \$58,128.91, including final approval of the
 3 \$37,573.70 (\$35,749.44 of fees and \$1,824.26 of expenses) paid to the firm on an
 4 interim basis, fees and costs incurred during the Final Application Period of
 5 \$8,558.55 and \$59.30, fees held back from its eleven previously-approved interim
 6 fee applications of \$8,937.36, and projected fees and costs to complete the legal tasks
 7 remaining to conclude the receivership of up to \$3,000.

8 Counsel for the Commission has reviewed this Application, along with
 9 Receiver's fee application filed concurrently herewith. The Commission does not
 10 oppose the applications.

11 **II. FINAL APPLICATION PERIOD**

12 The fees incurred by Allen Matkins during the Final Application Period total
 13 \$8,558.55 in fees for a total of 14.30 hours worked. The work performed is
 14 described task-by-task on Exhibit A and is broken down into the following
 15 categories:

Category	Hours	Amount
General Receivership	11.5	\$6,895.35
Reporting	2.8	\$1,663.20
Total Fees	14.30	\$8,558.55

16
 17
 18
 19
 20
 21 Allen Matkins has worked diligently and efficiently to assist the Receiver with
 22 urgent legal issues facing the receivership estate. Allen Matkins' work has assisted
 23 the Receiver in carrying out her Court-ordered duties and should be compensated for
 24 its work.

25
 26
 27
 28

1 **III. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED**

2 **A. Categories and Descriptions of Work**

3 1. General Receivership

4 This category includes Allen Matkins' work to advise the Receiver regarding
5 developments in the litigation between the Commission and Defendants, and
6 responses to inquiries and requests from the Commission and Defendants. The firm
7 also advised the Receiver on tax issues facing the Receivership Entities, a notice of
8 judgment enforcement against Impetus from Wells Fargo Bank, and a request from
9 the Internal Revenue Service for transfer of records relating to the Receivership
10 Entities. Finally, Allen Matkins assisted the Receiver in preparing the Motion to
11 Concluded and conferring with the counsel for the Commission regarding the
12 motion. The reasonable and necessary fees for work in this category total \$6,895.35.

13 2. Reporting

14 Allen Matkins' time in this category focused on preparing the Receiver's
15 Fourth Interim Report ("Fourth Report"), which was filed on July 31, 2019. Dkt.
16 No. 111. The Fourth Report contains a detailed description of the Receiver's actions
17 to implement the Court's orders, including cash recovered, the scope of the
18 enterprise, pending litigation matters, and consumer communications. The report
19 also includes the Receiver's recommendations for the continued administration of the
20 receivership estate. The reasonable and necessary fees for this work total \$1,663.20.

21 **B. Summary of Expenses Requested for Reimbursement**

22 Allen Matkins requests the Court approve reimbursement of \$59.30 in out-of-
23 pocket costs. The itemization of such expenses is summarized below by category.
24 The costs incurred by Allen Matkins during the Final Application Period are broken
25 down by category as follows:

26
27
28

Category	Total
Court Filing Fees/Recorder Fees/Secretary of State Fees (including associated messenger fees for delivery of documents)	\$56.20
Document Searches (incl. PACER, Lexis, Sec. of State)	\$3.10
TOTAL	\$ 59.30

IV. APPROVAL OF PRIOR INTERIM FEE APPLICATIONS AND PAYMENT OF HOLDBACKS

Allen Matkins respectfully requests that the Court grant final approval of the firm's three interim fee applications and that the Receiver be authorized to pay the amounts held back from those eleven interim fee applications as follows:

FEE APPLICATION	FEES INCURRED	INTERIM 80% PAYMENT	20% HOLDBACK
First	\$25,641.90	\$20,513.52	\$5,128.38
Second	\$6,820.65	\$5,456.52	\$1,364.13
Third	\$12,224.25	\$9779.40	\$2,444.85
TOTAL	\$44,686.80	\$35,749.44	\$8,937.36

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 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

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

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

23 Allen Matkins has submitted a detailed fee application, which describes the
24 nature of the services rendered, and the identity and billing rate of each individual
25 performing each task. *See* Exhibit A. Allen Matkins has endeavored to staff matters
26 as efficiently as possible while remaining cognizant of the complexity of issues. The
27 request for fees is based on Allen Matkins' customary billing rates charged for
28 comparable services provided in other matters, less a 10% discount.

1 The work performed by Allen Matkins was essential to carrying out the
2 Receiver's Court-ordered duties. The Receiver and Allen Matkins have worked
3 diligently since the Receiver's appointment to preserve and protect the assets of the
4 receivership estate. Allen Matkins' fees are fair and reasonable and should be
5 approved.

6 **VI. CONCLUSION**

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

8 1. Approving Allen Matkins' fees and costs for the receivership in the
9 amount of \$58,128.91, including:

10 a. Approval and authority to pay fees of \$8,558.55 and costs of
11 \$59.30 for the Final Application Period;

12 b. Approval, on a final basis, of the \$37,573.70 (\$35,749.44 of fees
13 and \$1,824.26 of costs) paid to Allen Matkins pursuant to its three interim fee
14 applications;

15 c. Approval and authority to pay fees held back from Allen Matkins
16 eleven interim fee applications in the amount of \$8,937.36;

17 d. Approval and authority to pay projected fees and costs from the
18 reserve in an amount up to \$3,000 to complete the legal tasks remaining to conclude
19 the receivership; and

20 2. Granting such other and further relief as the Court deems appropriate.
21

22 Dated: June 29, 2020

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/ Edward Fates

EDWARD G. FATES
Attorneys for Receiver
KRISTA L. FREITAG

EXHIBIT A

EXHIBIT A

}

06/25/20 20:36:40 PROFORMA STATEMENT FOR MATTER 378119.00002 (Krista Freitag, as Receiver for Impetus) (General Receivership)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted)

Matter #: 378119.00002

Client Name: Krista Freitag, as Receiver for Impetus

Date of Last Billing: 10/09/19

Matter Name: General Receivership

Proforma Number: 1041738

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		
07/02/19	136139	Review lengthy correspondence from B. Colombana and update Receiver regarding same.	Fates, Edward (Ted)	0.20	118.80	118.80	WO	HD	TR	_____
07/23/19	95843	Review notices of taxes owed from FTB, discuss same with Receiver.	Fates, Edward (Ted)	0.40	237.60	356.40	WO	HD	TR	_____
08/09/19	47327	Brief review of FTC motion for sanctions against Colombana and advise Receiver regarding same.	Fates, Edward (Ted)	0.30	178.20	534.60	WO	HD	TR	_____
08/26/19	12866	Analyze terms of judgment against Avitia-Pena and advise Receiver regarding same.	Fates, Edward (Ted)	0.20	118.80	653.40	WO	HD	TR	_____
08/29/19	81971	Call/emails with Receiver and counsel for FTC regarding motion for summary judgment as to B. Colombana and declaration from Receiver regarding certification of business records.	Fates, Edward (Ted)	0.30	178.20	831.60	WO	HD	TR	_____
10/04/19	112209	Review summary judgment motion, default judgment motion, and sanctions motion against B. Colombana, as well as correspondence from FTC regarding same.	Fates, Edward (Ted)	0.30	178.20	1,009.80	WO	HD	TR	_____

06/25/20 20:36:40 PROFORMA STATEMENT FOR MATTER 378119.00002 (Krista Freitag, as Receiver for Impetus) (General Receivership)

Fees for Matter 378119.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/01/19	101560	Analyze status of case and potential motion to seek discharge of receiver and closure of receivership, discuss same with Receiver (.4); communications with FTC counsel regarding same (.2).	Fates, Edward (Ted)	0.60	356.40	1,366.20	WO	HD	TR	_____
11/04/19	106916	Call with Receiver and FTC counsel regarding default judgments, timing of wrapping up receivership, retention of records, and related issues.	Fates, Edward (Ted)	0.30	178.20	1,544.40	WO	HD	TR	_____
11/05/19	119502	TC with Ted Fates re. tax issues.	Kraus, Katherine	0.70	456.75	2,001.15	WO	HD	TR	_____
11/05/19	125423	Analyze issues regarding lack of financial records and approach to company tax returns; discuss same with Receiver.	Fates, Edward (Ted)	1.10	653.40	2,654.55	WO	HD	TR	_____
11/13/19	41457	TC with Krista Freitag re. tax issues.	Kraus, Katherine	0.40	261.00	2,915.55	WO	HD	TR	_____
11/13/19	41473	Advise Receiver regarding issues and strategy for receivership entity tax returns.	Fates, Edward (Ted)	0.40	237.60	3,153.15	WO	HD	TR	_____
11/14/19	47840	Communications with FTC counsel regarding issues relating to timing of wrap up of receivership and turn over of documents.	Fates, Edward (Ted)	0.20	118.80	3,271.95	WO	HD	TR	_____
11/19/19	73988	Communications with Receiver and FTC counsel regarding issues relating to tax returns and custody of documents.	Fates, Edward (Ted)	0.30	178.20	3,450.15	WO	HD	TR	_____
11/22/19	79388	Call with Receiver and FTC counsel regarding receivership estate tax issues	Fates, Edward (Ted)	0.40	237.60	3,687.75	WO	HD	TR	_____

06/25/20 20:36:40 PROFORMA STATEMENT FOR MATTER 378119.00002 (Krista Freitag, as Receiver for Impetus) (General Receivership)

Fees for Matter 378119.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		and turn over of hard copy documents.								
01/08/20	33157	Address issues regarding potential taxes owed by receivership entities, anticipated wrap up of receivership, and 31 USC 3713 (.4); discuss same with Receiver (.2).	Fates, Edward (Ted)	0.60	356.40	4,044.15	WO	HD	TR	_____
02/27/20	8015273	Analyze Default Judgment order and timing re: termination of receivership and discuss same and next steps with Receiver	Fates, Edward (Ted)	0.40	237.60	4,281.75	WO	HD	TR	_____
03/04/20	8027479	Analyze and advise Receiver on issues relating to tax returns and turnover of funds to FTC	Fates, Edward (Ted)	0.40	237.60	4,519.35	WO	HD	TR	_____
03/23/20	8042277	Analyze and advise Receiver re: notice from Wells Fargo re: judgment enforcement as to Impetus Enterprises	Fates, Edward (Ted)	0.40	237.60	4,756.95	WO	HD	TR	_____
03/30/20	8048024	Analyze and advise Receiver re: FTC notice of unpaid judgment	Fates, Edward (Ted)	0.20	118.80	4,875.75	WO	HD	TR	_____
04/02/20	8053973	Advise Receiver on issues re: preparation of motion to conclude receivership	Fates, Edward (Ted)	0.40	237.60	5,113.35	WO	HD	TR	_____
05/21/20	8099297	Communications with Receiver and FTC counsel re: process for wrapping up receivership and motion re: same	Fates, Edward (Ted)	0.40	237.60	5,350.95	WO	HD	TR	_____
06/15/20	8121166	Communications with Receiver and counsel for FTC re: transfer of receivership documents at closing of receivership	Fates, Edward (Ted)	0.40	237.60	5,588.55	WO	HD	TR	_____
06/23/20	8128429	Revisions to motion to conclude receivership and for related relief (1.7) discuss same with Receiver (.5)	Fates, Edward (Ted)	2.20	1,306.80	6,895.35	WO	HD	TR	_____

Fees for Matter 378119.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
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Disbursements for Matter 378119.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	WO	HD	TR	_____
07/01/19	156522	DCSRCH – Document Search - - WellsOne, 4/01/2019-6/30/2019^4406104-Q22019^4406104Q22019	1.00	3.10	WO	HD	TR	_____
07/31/19	115908	MSNGR – Messenger - - Nationwide Legal, LLC, ^196565	1.00	56.20	WO	HD	TR	_____

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	10.40	594.00	6,177.60
002372	Kraus, Katherine	1.10	652.50	717.75
		<u>11.50</u>		<u>\$6,895.35</u>
Subtotal Fees				\$6,895.35
Discount				0.00
Total Fees				6,895.35
Total Disbursements				59.30

Attorney Billing Instructions

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

Billing Instructions

EXPIRES 12/31/2020: 10% OFF STANDARD RATES; NO TEXT EDITING; COPIES .10; NO CONFERENCE CALLS

Account Summary – As Of 06/25/20

Fiscal YTD			Calendar YTD			LTD		
Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements

06/25/20 20:36:40 PROFORMA STATEMENT FOR MATTER 378119.00002 (Krista Freitag, as Receiver for Impetus) (General Receivership)

Worked	6,955.25	6,895.35	59.90	3,207.60	3,207.60	0.00	6,954.65	6,895.35	59.30
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	5,931.40	5,118.75	812.65	0.00	0.00	0.00	15,285.60	15,285.60	1,824.26
Collected	5,931.40	5,118.75	812.65	0.00	0.00	0.00	17,109.86	15,285.60	1,824.26
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	6,954.65	6,895.35	59.30						
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 Impetus Enterprise, Inc.
E3 Advisors
401 W. 'A' Street, Suite 1830
San Diego, CA 92101

}
06/25/20 20:36:41 PROFORMA STATEMENT FOR MATTER 378119.00004 (Krista Freitag, as Receiver for Impetus) (Reporting)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward Matter #: 378119.00004 Client Name: Krista Freitag, as Receiver for Impetus
(Ted)
Date of Last Billing: 10/09/19 Matter Name: Reporting
Proforma Number: 1041738
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		
07/23/19	95844	Discuss content and strategy for 4th interim report with Receiver.	Fates, Edward (Ted)	0.20	118.80	118.80	WO	HD	TR	_____
07/25/19	105106	Work on Receiver's 4th interim report (1.4); discuss same with Receiver (.3); meet and confer communications with counsel for FTC (.1).	Fates, Edward (Ted)	1.80	1,069.20	1,188.00	WO	HD	TR	_____
07/29/19	92105	Meet and confer communications with counsel for FTC regarding 4th interim report.	Fates, Edward (Ted)	0.20	118.80	1,306.80	WO	HD	TR	_____
07/30/19	101173	Revise and finalize 4th interim report.	Fates, Edward (Ted)	0.40	237.60	1,544.40	WO	HD	TR	_____
01/08/20	33158	Discuss preparation of interim report and scope of same with Receiver.	Fates, Edward (Ted)	0.20	118.80	1,663.20	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
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Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.80	594.00	1,663.20
		<u>2.80</u>		\$1,663.20
Subtotal Fees				\$1,663.20
Discount				0.00
Total Fees				1,663.20
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

EXPIRES 12/31/2020: 10% OFF STANDARD RATES; NO TEXT EDITING; COPIES .10; NO CONFERENCE CALLS

Account Summary – As Of 06/25/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,663.20	1,663.20	0.00	118.80	118.80	0.00	1,663.20	1,663.20	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	1,237.50	1,237.50	0.00	0.00	0.00	0.00	5,850.00	5,850.00	0.00
Collected	1,237.50	1,237.50	0.00	0.00	0.00	0.00	5,850.00	5,850.00	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	1,663.20	1,663.20	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

06/25/20 20:36:41 PROFORMA STATEMENT FOR MATTER 378119.00004 (Krista Freitag, as Receiver for Impetus) (Reporting)

Billing Address

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