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

**FIRST INTERIM FEE
 APPLICATION OF KRISTA L.
 FREITAG, COURT-APPOINTED
 RECEIVER, FOR PAYMENT OF
 FEES AND REIMBURSEMENT OF
 EXPENSES**

Date: March 29, 2019
 Time: 2:30 p.m.
 Ctrm.: 10A
 Judge: Hon. Josephine L. Staton

Pursuant to the Preliminary Injunction with Asset Freeze, Appointment of Receiver, and Other Equitable Relief entered November 29, 2018 (the "PI Order")¹, Krista L. Freitag ("Receiver"), the Court-appointed permanent receiver for Impetus Enterprise, Inc. ("Impetus") and Fig Tree & Co., LLC ("Fig Tree"), each of their subsidiaries, affiliates, successors and assigns, and any other entity that has conducted any business related to Defendants' student debt relief enterprise, including but not limited to Capital Sun Investments, LLC (d/b/a Studora) or Premier Capital Investments, LLC, and Jimmy Calderon (when conducting activities in relation to any of the foregoing entities) (the "Receivership Entities"), hereby submits this first interim application for approval and payment of fees and reimbursement of expenses ("Application"). This Application covers the period from the Receiver's appointment on November 13, 2018 through December 31, 2018 ("First Application Period"), and seeks interim approval of \$58,590.00 in fees and \$1,645.88 in expenses paid plus \$3,586.48 of computer forensic imaging incurred, and an order authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred (\$46,872.00) and 100% of expenses paid and incurred.

I. INTRODUCTION

This receivership involves several entities which, acting alone or in concert with others, purportedly advertised, marketed, offered to provide, provided, offered for sale or sold student loan debt relief services to consumers throughout the United States; such conduct is at the heart of the action filed by the Federal Trade Commission ("Commission"). Based on the evidence presented by the Commission, the Court found good cause to appoint the Receiver on a temporary basis via the Ex Parte Temporary Restraining Order with Asset Freeze,

¹ Section XX of the PI Order provides that "the Receiver shall file with the Court and serve on the parties periodic requests for the payment of such reasonable compensation, with the first such request filed no more than sixty (60) days after the date of the entry of this Order."

1 Appointment of Temporary Receiver, Limited Expediated Discovery, and Order to
 2 Show Cause Why Preliminary Injunction Should Not Issue (the "TRO") entered on
 3 November 13, 2018 (Dkt. No. 23), and on a permanent basis via the PI Order
 4 entered on November 29, 2018 (Dkt. No. 38).

5 With full powers of an equity receiver, the appointment orders confer broad
 6 duties, responsibilities, and powers on the Receiver, including but not limited to
 7 taking exclusive custody, control, and possession of all assets and documents of
 8 the Receivership Entities. The appointment orders also authorize the Receiver to
 9 engage counsel to assist her in the performance of her duties. The Receiver
 10 promptly determined that experienced, qualified counsel was critical due to the
 11 scope and complexity of her duties under the TRO. Accordingly, the Receiver
 12 engaged Allen Matkins to assist with urgent legal issues.

13 This Application should be read in conjunction with the Receiver's First
 14 Report and Recommendations (the "First Report") (Dkt. No. 27) and the Receiver's
 15 Second Interim Report (the "Second Report") (Dkt. No. 44) and seeks interim
 16 approval of \$58,590.00 in fees for a total of 259.0 hours worked and payment on
 17 an interim basis of 80% of that amount, or \$46,872.00. The work performed is
 18 described task-by-task on Exhibit A and is broken down into the following
 19 categories:

Category	Hours	Amount
General Receivership	140.7	\$32,226.75
Asset Investigation & Recovery	1.9	487.35
Reporting	14.0	4,084.20
Operations & Asset Sales	94.5	19,488.15
Customer Correspondence & Claims	2.8	811.80
Forensic Accounting	5.1	1,491.75
Total	259.0	\$58,590.00

27 The initial phase of an equity receivership always involves substantial work
 28 by the Receiver and the Receiver's professionals to, (a) locate, identify, secure and

1 preserve business premises, records, cash and other assets, (b) notify vendors and
2 other parties, (c) transition operational matters, (d) locate, gather and review books
3 and records, (e) recover assets, and (f) advise the Court on the status of the
4 Receiver's activities. As this type of receivership progresses, fees and costs
5 generally decline as the assets are secured and protected, and procedures for the
6 efficient administration of receivership are put in place.

7 In this instance, significant efforts have been expended to secure identified
8 funds and to identify and/or verify dozens of potentially affiliated entities/business
9 names and alternative operating locations and/or business addresses. Thus far, the
10 Receiver has been able to identify and secure approximately \$330,000 in cash
11 primarily from payment processor reserve balances. At this point, the Receiver is
12 not aware of any other material funds or assets of the Receivership Entities. In
13 light of the government shutdown and impact on the Commission, however, the
14 full extent of assets frozen pursuant to the TRO and PI Order is not yet fully
15 known as certain institutional responses have yet to be received. Certain financial
16 institutions respond directly to the Commission's asset freeze; the Receiver then
17 gains access to such documentation through the Commission. No real property
18 owned by the Receivership Entities has yet been identified and the Receiver is still
19 awaiting other account information, as mentioned above.

20 The largest category of work – General Receivership – represents 55.0% of
21 the fees incurred in the First Application Period. This category is substantially
22 non-recurring and required significant time associated with, (a) preparing for,
23 taking over and securing one physical office premise, (b) investigating dozens of
24 possible other entities and/or locations/business addresses and working to secure
25 management and control of them, (c) gaining access to many
26 operations'/Receivership Entities' books, records and accounts, (d) noticing
27 numerous vendors and conferring with consumers, (e) reviewing numerous
28 operations'/Receivership Entities' books, records and accounts, (f) correspondence

1 with a voluminous number of banking institutions and payment processors, and (g)
 2 preparing for and attending the Preliminary Injunction hearing. The next largest
 3 category of work - Operations – represents 33.3% of the fees incurred in the First
 4 Application Period and includes monitoring of mail, coordination of and assisting
 5 with vacating the one office premise, reviewing and logging records produced,
 6 securing funds, and general operational matters.

7 Although the fees for the First Application Period are significant, a material
 8 amount of the work involved non-recurring tasks associated with implementing the
 9 Court's orders. With operations now ceased and the bulk of the takeover
 10 completed, fees are expected to be limited going forward. However, if sufficient
 11 assets are located and secured such that a meaningful recovery can be provided to
 12 harmed consumers, the Receiver could proceed with an accounting to establish,
 13 among other things, the scope of consumer damages and the proper amounts of
 14 consumer claims. The Receiver has worked diligently and efficiently with urgent
 15 issues facing the receivership estate through the transition from an active
 16 enterprise to a Court-ordered receivership. The Receiver has worked diligently in
 17 carrying out her Court-ordered duties and should be compensated on an interim
 18 basis for her work.

19 **II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED**

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

21 **1. 02-General Receivership**

22 The Receiver's work in the General Receivership category primarily focused
 23 on, (a) review and analysis of the appointment orders and pleadings, (b) taking
 24 over and securing one office location, (c) coordinating imaging of the receivership
 25 estate's electronic devices, (d) setting up case-specific lines of communication and
 26 a designated website to provide salient case documents and contact information for
 27 the receivership, (e) noticing vendors of the receivership and conferring with
 28 consumers, (f) investigating dozens of other potentially-related entities and/or

1 locations/business addresses and working to secure management and control of
2 them, (g) securing and gaining access to books, records and accounts for the
3 numerous Defendant entities, dba's and related entities, some of which were
4 imperative to securing management and control, and (h) preparing for and
5 attending the Preliminary Injunction hearing.

6 This work is largely non-recurring and was necessary to (a) implement the
7 Court's orders and (b) takeover and secure the receivership estate's operations.
8 These tasks comprise the largest part of the Receiver's work during the First
9 Application Period. The reasonable and necessary fees for work in this category
10 during the First Application Period total \$32,226.75.

11 2. 03-Asset Investigation & Recovery

12 The reasonable and necessary fees for work in this category during the First
13 Application Period, which primarily reflect research on potential real property
14 assets, total \$487.35.

15 3. 04-Reporting

16 The Receiver's work in this category during the First Application Period
17 focused on preparing the Receiver's First Report and Recommendations filed on
18 November 20, 2018 (Dkt. No. 27). The reasonable and necessary fees for work in
19 this category during the First Application Period total \$4,084.20.

20 4. 05-Operations & Asset Sales

21 During the First Application Period, the Receiver's time in this category
22 includes work to organize and box records and efficiently vacate the office
23 premises, monitor mail, secure funds, review records produced and manage
24 general operational matters. Time associated with vacating the premises and
25 reviewing records already produced is non-recurring. The reasonable and
26 necessary fees for work during the First Application Period in this category total
27 \$19,488.15.

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1 5. 06-Customer Correspondence & Claims

2 During the First Application Period, the Receiver worked to correspond
3 with employees and consumers, as deemed necessary. The reasonable and
4 necessary fees for work during the First Application Period in this category total
5 \$811.80.

6 6. 10-Forensic Accounting

7 During the First Application Period, the Receiver was able to efficiently
8 perform a preliminary assessment of the scope of what appears to be the Studora
9 operations. The reasonable and necessary fees for work during the First
10 Application Period in this category total \$1,491.75.

11 7. Summary of Expenses Requested for Reimbursement

12 The Receiver requests the Court approve reimbursement of \$1,645.88 in
13 out-of-pocket costs, plus \$3,586.48 of forensic computer imaging costs incurred,
14 for a total of \$5,232.36. The itemization of such expenses is summarized below by
15 category.

16 The majority of the expenses incurred relate to the forensic computer
17 imaging, which is necessary to preserve and protect all electronic records and data
18 of the Receivership Entities. The Receiver also incurred expenses primarily
19 associated with the Receiver's bond, retrieving mail, noticing vendors, and setting
20 up a designated website for the receivership estate to provide access to case-related
21 information and updates.

22 The total reasonable and necessary costs paid and incurred by the Receiver
23 during the First Application Period is \$1,645.88 and \$3,586.48, respectively and is
24 broken out by category as follows:

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Category	Total
Receivership Website Set-Up & Maintenance	\$552.50
Receiver's Bond	\$171.00
Copies/Supplies	\$369.15
Postage	\$118.97
Other Misc. (includes labor for mail retrieval)	\$434.26
Total Out of Pocket Expenses Paid	\$1,645.88
Forensic Computer Imaging Costs Incurred	\$3,586.48
Total Expenses Paid and Incurred	\$5,232.36

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

"As a general rule, the expenses and fees of a receivership are a charge upon the property administered." *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994). These expenses include the fees and expenses of this Receiver and his professionals, including Allen Matkins. Decisions regarding the timing and amount of an award of fees and costs to me 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 imposed by the court upon the Receiver, the fair value of such time, labor and skill measured by conservative business standards, the degree of activity, integrity and dispatch with which the work is conducted and the result obtained." *United States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted). In practical terms, receiver and professional compensation thus ultimately rests upon the result of an equitable, multi-factor balancing test involving the "economy of administration, the burden that the estate may be able to bear, the amount of time required, although not necessarily expended, and the overall value of the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d

1 232, 237 (3d Cir. 1970). Regardless of how this balancing test is formulated, no
2 single factor is determinative and "a reasonable fee is based [upon] all
3 circumstances surrounding receivership." *SEC v. W.L. Moody & Co., Bankers*
4 (*Unincorporated*), 374 F. Supp. 465, 480 (S.D. Tex. 1974).

5 As a preliminary matter, the Orders confer on the Receiver substantial duties
6 and powers, including to conduct such investigation and discovery as is necessary
7 to locate and account for all receivership assets, take such action as is necessary
8 and appropriate to assume control over and preserve receivership assets, and
9 employ attorneys and others to investigate and, where appropriate, institute,
10 pursue, and prosecute all claims and causes of action of whatever kind and nature.
11 The Receiver promptly determined that experienced, qualified counsel was
12 necessary due to the complexity of the receivership estate.

13 The Receiver has submitted a detailed fee application which describes the
14 nature of the services rendered, and the identity and billing rate of each individual
15 performing each task. *See* Exhibit A. The Receiver has endeavored to staff
16 matters as efficiently as possible while remaining cognizant of the importance of
17 issues presented and preserving books and records of the receivership estate. The
18 request for fees is based on the Receiver's customary billing rates charged for
19 comparable services provided in other matters, less a 10% discount.

20 The work performed by the Receiver was essential to carrying out the
21 Court-ordered duties. The Receiver and Allen Matkins have worked diligently
22 since the Receiver's appointment to preserve, protect and recover the assets and
23 records of receivership estate and to carry out the Court's orders. Moreover, the
24 Receiver seeks payment of only 80% of fees incurred on an interim basis in
25 recognition of the fact that her work is ongoing. Payment of the proposed 20%
26 holdback will be sought at the conclusion of receivership. The Receiver's fees are
27 fair and reasonable and should be approved and paid on an interim basis.

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IV. CONCLUSION

The Receiver therefore respectfully requests this Court enter an Order:

1. Approving the Receiver's fees, on an interim basis, of \$58,590.00;
2. Authorizing and directing the Receiver to pay 80% of approved fees, or \$46,872.00, from the assets of Receivership Entities;
3. Approving the Receiver's costs paid in the amount of \$1,645.88, plus \$3,586.48 of forensic computer imaging costs incurred, for a total of \$5,232.36 and authorizing and directing the Receiver to reimburse such costs in full; and
4. For such other and further relief as the Court deems appropriate.

Dated: January 29, 2019

By: 
KRISTA L. FREITAG
Receiver

Dated: January 29, 2019

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/ Edward G. Fates

EDWARD G. FATES
Attorneys for Receiver
KRISTA L. FREITAG

EXHIBIT A

FTC v Impetus, et. al.

November 2018 - December 2018 Fees

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	001	002	003	004	005	006	007	008	009	010
11/13/2018	Coordinated conference call; prepared takeover checklist, demand for documents, bank/vendor preservation letter; conferred with G. Rodriguez re: IT needs and real property research, etc. (4.0)	4.0	K. Freitag	\$ 292.50	\$ 1,170.00	\$ -	\$ 1,170.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/13/2018	Reviewed preparatory documents provided by K. Freitag; attended conference call. (2.1)	2.1	S. Hoslett	\$ 256.50	\$ 538.65	\$ -	\$ 538.65	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/13/2018	Reviewed takeover documents; attended conference call. (1.0)	1.0	T. Hebrank	\$ 256.50	\$ 256.50	\$ -	\$ 256.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/13/2018	Began set up work for new project, including coordinating forensic IT specialist and web developer, setup of email account and preparations for a phone number and prepared for takeover of company website and phone system. (1.1) Sent real estate information and reports to K. Freitag. (.3)	1.4	G. Rodriguez	\$ 256.50	\$ 359.10	\$ -	\$ 282.15	\$ -	\$ 76.95	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/14/2018	Coordinated final preparatory call; prepared final revisions to takeover checklist, demand for documents, banks, authorization letters, etc; reviewed complaint, order and other misc. (5.6)	5.6	K. Freitag	\$ 292.50	\$ 1,638.00	\$ -	\$ 1,638.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/14/2018	Participated in final prep call; reviewed documents provided by FTC including the Complaint, TRO and other related documents (1.0)	1.0	S. Hoslett	\$ 256.50	\$ 256.50	\$ -	\$ 256.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/14/2018	Conferred and corresponded with L. Ryan re serving court order to banks. (.1) Reviewed to do list for takeover. (.2)	0.3	A. Herren	\$ 225.00	\$ 67.50	\$ -	\$ 67.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/14/2018	Began project set up work, reviewed documents, prepared multiple bank letters and conferred with Chase. (2.2)	2.2	L. Ryan	\$ 121.50	\$ 267.30	\$ -	\$ 267.30	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/14/2018	Conf call with project team to plan for project takeover; reviewed order and FTC case documents. (1.5)	1.5	T. Hebrank	\$ 256.50	\$ 384.75	\$ -	\$ 384.75	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/15/2018	Coordinated, directed and participated in takeover, to include service of order on 4th Street occupant, securing premises, coordination of forensic computer work, thorough review of onsite and banking records, employee interviews, investigate alternative addresses, vendor/landlord discussions, etc. (13.3)	13.3	K. Freitag	\$ 292.50	\$ 3,890.25	\$ -	\$ 3,890.25	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/15/2018	Travel to/from OC for project takeover. (4.0)	4.0	S. Hoslett	\$ 128.25	\$ 513.00	\$ -	\$ 513.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/15/2018	Participated in takeover; served order on numerous satellite locations. (4.5)	4.5	S. Hoslett	\$ 256.50	\$ 1,154.25	\$ -	\$ 1,154.25	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/15/2018	Served court order and notification letter to Bank of America and Chase; corresponded with L. Ryan re same. (1.5) Archived bank records from T. Hebrank; corresponded with T. Hebrank and L. Ryan re same. (.5) Processed change of address for Santa Ana, CA location; updated tracking log; corresponded with K. Freitag re same. (.1)	2.1	A. Herren	\$ 225.00	\$ 472.50	\$ -	\$ 472.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/15/2018	Coordinated SETEC onsite for takeover and briefly discussed takeover with K. Freitag and reviewed related documents. (0.2) Conferred with K. Freitag re GoDaddy and other internet accounts, and sent notice of Order to GoDaddy to obtain control over accounts. (0.4)	0.6	G. Rodriguez	\$ 256.50	\$ 153.90	\$ -	\$ 153.90	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/15/2018	Continued to work on bank letters, prepare to serve including serving to Wells Fargo, Chase and Bankcard and corresponded multiple times with same. (3.9) Conferred and followed up with Orange Merchant and virtual office. (.8) Conferred multiple times with team re Chase, merchants. (.6) Researched merchant online system and pulled reports. (.8)	6.1	L. Ryan	\$ 121.50	\$ 741.15	\$ -	\$ 741.15	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/15/2018	Travel to/from project takeover. (4.0)	4.0	T. Hebrank	\$ 128.25	\$ 513.00	\$ -	\$ 513.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/15/2018	Participated in project takeover, focusing on office inventory, banking and accounting related records. (7.0)	7.0	T. Hebrank	\$ 256.50	\$ 1,795.50	\$ -	\$ 1,795.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	001	002	003	004	005	006	007	008	009	010
11/16/2018	Continued review of records and pursuit of banking, payment processing, service provider (notably CRM providers), vendor noticing. (5.2) Conferred with T. Hebrank re: project update and signature cards. (.3) Confirmed freezes and conferred with CRM platform contacts (numerous). (1.6) Prepared website, email, voicemail updates. (1.1)	8.2	K. Freitag	\$ 292.50	\$ 2,398.50	\$ -	\$ 1,608.75	\$ -	\$ -	\$ 468.00	\$ 321.75	\$ -	\$ -	\$ -	\$ -
11/16/2018	Served court order and notification letter to Bank of America; corresponded with L. Ryan re same. (.5) Processed numerous change of addresses for California and Utah locations; updated tracking log; corresponded with K. Freitag re same. (.7) Scanned and archived bank contact information; corresponded with L. Ryan re same. (.3)	1.5	A. Herren	\$ 225.00	\$ 337.50	\$ -	\$ 270.00	\$ -	\$ -	\$ 67.50	\$ -	\$ -	\$ -	\$ -	\$ -
11/16/2018	Prepared website content and corresponded with web developer re same. (0.6) Noticed various Electronic Data Hosts re Court Order and conferred and corresponded (various) with those parties in response to follow up questions. (2.5) Researched properties potentially linked to relief defendants and provided additional information to K. Freitag. (0.3)	3.4	G. Rodriguez	\$ 256.50	\$ 872.10	\$ -	\$ 641.25	\$ 76.95	\$ -	\$ 153.90	\$ -	\$ -	\$ -	\$ -	\$ -
11/16/2018	Tracked and updated bank information, prepared additional notices for Chase and conferred with potential new bank. (3.2) Faxed notice (various) to merchant servicers and conferred with same. (1.1)	4.3	L. Ryan	\$ 121.50	\$ 522.45	\$ -	\$ 522.45	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/16/2018	Update call with K Freitag; executed signature cards. (.4)	0.4	T. Hebrank	\$ 256.50	\$ 102.60	\$ -	\$ 102.60	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/17/2018	Met employees to retrieve personal belongings. (1.8) Researched and followed up on banking, processor, alternative address contacts. (.4) Reviewed underlying banking, noticing and other data to commence drafting of preliminary report. (3.7)	5.9	K. Freitag	\$ 292.50	\$ 1,725.75	\$ -	\$ 526.50	\$ -	\$ 1,082.25	\$ 117.00	\$ -	\$ -	\$ -	\$ -	\$ -
11/19/2018	Worked on preliminary report. (1.3) Began review of CRM data and researched IDR Education/Synergy account. (3.6) Worked on obtaining access to records, banking data, websites (Go Daddy), etc. (1.0) Researched several additional addresses located on records. (1.3)	7.2	K. Freitag	\$ 292.50	\$ 2,106.00	\$ -	\$ 672.75	\$ -	\$ 380.25	\$ 1,053.00	\$ -	\$ -	\$ -	\$ -	\$ -
11/19/2018	Processed change of address for numerous California locations; updated tracking log; corresponded with K. Freitag re same. (.3) Conferred and corresponded with a representative of USPS re confirmation of legitimacy for address changes. (.3)	0.6	A. Herren	\$ 225.00	\$ 135.00	\$ -	\$ 135.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/19/2018	Reviewed data provided by ringcentral for company's accounts. (0.6) Continued work on reaching out to Electronic Data Hosts to receive access to the Entities files, including discussion with RingCentral, GoDaddy, DebtPayPro and YTel re accounts access and brief review of information provided by each. (1.0) Researched additional properties for K. Freitag. (0.9)	2.5	G. Rodriguez	\$ 256.50	\$ 641.25	\$ -	\$ 256.50	\$ 230.85	\$ -	\$ 153.90	\$ -	\$ -	\$ -	\$ -	\$ -
11/19/2018	Conferred and corresponded multiple times with multiple merchant servicers and noticed same. (3.3) Updated bank log and requested information from Chase. (1.2) Researched potential entities. (.9)	5.4	L. Ryan	\$ 121.50	\$ 656.10	\$ -	\$ 400.95	\$ -	\$ -	\$ 255.15	\$ -	\$ -	\$ -	\$ -	\$ -
11/20/2018	Completed preliminary report and prepared exhibits; conferred with Atty Fates re: same. (6.9) Sent update to employees. (.1) Conferred with G. Rodriguez and several vendors re: order notice. (.5) Issued notices and conferred with A. Herren re: additional address changes needed. (.2) Pulled down FTP site productions; briefly reviewed same. (.6)	8.3	K. Freitag	\$ 292.50	\$ 2,427.75	\$ -	\$ 380.25	\$ -	\$ 2,018.25	\$ -	\$ 29.25	\$ -	\$ -	\$ -	\$ -
11/20/2018	Processed change of address for Florida and Oregon locations location; updated tracking log; corresponded with K. Freitag re same. (.3)	0.3	A. Herren	\$ 225.00	\$ 67.50	\$ -	\$ 67.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	001	002	003	004	005	006	007	008	009	010
11/20/2018	Continued work to gain access to Electronic Data Hosts, including discussion with K. Freitag re GoDaddy and Ytel accounts and correspondence with Ytel seeking detailed records and access to the account. (0.4)	0.4	G. Rodriguez	\$ 256.50	\$ 102.60	\$ -	\$ 102.60	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/20/2018	Conferred and corresponded with multiple merchants and banks, updated bank log and prepared bank exhibit; reviewed bank responses to FTC. (3.7) Researched prospective additional merchant companies and contacted same. (1.1)	4.8	L. Ryan	\$ 121.50	\$ 583.20	\$ -	\$ 133.65	\$ -	\$ -	\$ 449.55	\$ -	\$ -	\$ -	\$ -	\$ -
11/21/2018	Followed up with Go Daddy. (1) Reviewed numerous documents from onsite and banking records. (1.5) Coordinated mail retrieval. (.3)	1.9	K. Freitag	\$ 292.50	\$ 555.75	\$ -	\$ 29.25	\$ -	\$ -	\$ 526.50	\$ -	\$ -	\$ -	\$ -	\$ -
11/21/2018	Researched ownership/broker/property manager contact information for a potential site in Irvine, CA. (0.7) Continued work on noticing Electronic Data Hosts and collecting information from the, including discussion with K. Freitag re GoDaddy account access (or lack thereof) and their lack of response to our repeated requests and noticing five9.com re Impetus Enterprises status. (0.6)	1.3	G. Rodriguez	\$ 256.50	\$ 333.45	\$ -	\$ 153.90	\$ 179.55	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/21/2018	Corresponded with merchants and banks; requested documents and updated bank log. (1.0)	1.0	L. Ryan	\$ 121.50	\$ 121.50	\$ -	\$ -	\$ -	\$ -	\$ 121.50	\$ -	\$ -	\$ -	\$ -	\$ -
11/25/2018	Reviewed materials filed by Calderon and FTC. (3.2)	3.2	K. Freitag	\$ 292.50	\$ 936.00	\$ -	\$ 936.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/26/2018	Met and conferred with counsel and authorities re: hearing. (4) Prepared for and attended Preliminary Injunction Hearing. (3.1) Retrieved mail from Von Karman location. (1.1)	4.6	K. Freitag	\$ 292.50	\$ 1,345.50	\$ -	\$ 1,023.75	\$ -	\$ -	\$ 321.75	\$ -	\$ -	\$ -	\$ -	\$ -
11/26/2018	Downloaded and reviewed files provided by SETEC of J. Calderon's and A. Lugo's respective computers (0.5)	0.5	G. Rodriguez	\$ 256.50	\$ 128.25	\$ -	\$ -	\$ -	\$ -	\$ 128.25	\$ -	\$ -	\$ -	\$ -	\$ -
11/26/2018	Corresponded with merchant legal department. (.3)	0.3	L. Ryan	\$ 121.50	\$ 36.45	\$ -	\$ 36.45	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/27/2018	Sent correspondence to employees. (.2) Conferred with Atty for landlord. (.2) Served Order on two IT contacts located at Go Daddy accounts. (.3) Reviewed mail, EMS response and replied with demand and researched new entity on same; directed correspondence to GoDaddy re: research on new entity domain and re: bank notice updates. (2.5)	3.2	K. Freitag	\$ 292.50	\$ 936.00	\$ -	\$ 87.75	\$ -	\$ -	\$ 789.75	\$ 58.50	\$ -	\$ -	\$ -	\$ -
11/27/2018	Researched office locations; contacted numerous locations regarding contact information; served court order to same; updated tracking log; corresponded with K. Freitag re same. (2.5)	2.5	A. Herren	\$ 225.00	\$ 562.50	\$ -	\$ 562.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/27/2018	Continued work on securing Electronic Data Hosts and other electronic files, including discussion with K. Freitag re Go-Daddy accounts, began transitioning Entities websites to Receiver's control, provided account information to K. Freitag to provide further avenues of investigation and discussion with SETEC re quickbooks files potentially located on company drives. (1.6)	1.6	G. Rodriguez	\$ 256.50	\$ 410.40	\$ -	\$ 410.40	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/27/2018	Corresponded with Chase re new account and facilitated bank documents. (.5)	0.5	L. Ryan	\$ 121.50	\$ 60.75	\$ -	\$ -	\$ -	\$ -	\$ 60.75	\$ -	\$ -	\$ -	\$ -	\$ -
11/28/2018	Reviewed banking records and mail; conferred with A. Herren re: same. (1.0) Conferred with FTC and coordinated State of OR response. (.2) Provided Premier Capital Investments documentation. (.3)	1.5	K. Freitag	\$ 292.50	\$ 438.75	\$ -	\$ 58.50	\$ -	\$ -	\$ 380.25	\$ -	\$ -	\$ -	\$ -	\$ -
11/28/2018	Corresponded with K. Freitag re mail received. (.1)	0.1	A. Herren	\$ 225.00	\$ 22.50	\$ -	\$ -	\$ -	\$ -	\$ 22.50	\$ -	\$ -	\$ -	\$ -	\$ -
11/28/2018	Continued work to gain full control of the IDREducation domain after a re-takeover attempt by the defendant. (0.7)	0.7	G. Rodriguez	\$ 256.50	\$ 179.55	\$ -	\$ 179.55	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/28/2018	Followed up on Chase accounts and prepared W9. (.5)	0.5	L. Ryan	\$ 121.50	\$ 60.75	\$ -	\$ -	\$ -	\$ -	\$ 60.75	\$ -	\$ -	\$ -	\$ -	\$ -

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	001	002	003	004	005	006	007	008	009	010
11/29/2018	Researched vendors; conferred with L. Ryan re: same and banking W9 needed. (.5) Finalized global vendor letter. (.4) Reviewed and followed up on various vendor responses. (1.3)	2.2	K. Freitag	\$ 292.50	\$ 643.50	\$ -	\$ -	\$ -	\$ -	\$ 643.50	\$ -	\$ -	\$ -	\$ -	\$ -
11/29/2018	Served additional court order and notification letter to Bank of America; corresponded with L. Ryan re same. (.5) Researched office locations; contacted numerous locations regarding contact information; forwarded copy of court order to same; updated tracking log; corresponded with K. Freitag re same. (.6) Researched and updated vendor contact information; corresponded with L. Ryan re same. (1.0)	2.1	A. Herren	\$ 225.00	\$ 472.50	\$ -	\$ 247.50	\$ -	\$ -	\$ 225.00	\$ -	\$ -	\$ -	\$ -	\$ -
11/29/2018	Continued work to secure the websites and forward to FTC case website and to further serve the PI order on Go-Daddy to gain access to additional sites. (1.6)	1.6	G. Rodriguez	\$ 256.50	\$ 410.40	\$ -	\$ 410.40	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11/29/2018	Conferred, corresponded and noticed Echeck, Leap and Payment Cloud. (2.1) Updated bank log and notice log and tracked documents received. (1.3) Researched potential vendors and prepared list. (2.0)	5.4	L. Ryan	\$ 121.50	\$ 656.10	\$ -	\$ 255.15	\$ -	\$ -	\$ 400.95	\$ -	\$ -	\$ -	\$ -	\$ -
11/30/2018	Prepared for mail run. (.3) Reviewed DebtPayPro contracts. (.4) Reviewed various documentation and correspondence, including from Def Colombiana. (1.9) Prepared website and email autoreply updates; conferred with G. Rodriguez re: same. (.8)	3.4	K. Freitag	\$ 292.50	\$ 994.50	\$ -	\$ -	\$ -	\$ -	\$ 760.50	\$ 234.00	\$ -	\$ -	\$ -	\$ -
11/30/2018	Researched office locations; contacted numerous locations regarding contact information; forwarded copy of court order to same; updated tracking log; corresponded with K. Freitag re same. (1.0) Scanned and archived bank contact information; corresponded with L. Ryan re same. (.1) Researched and updated vendor and employee contact information; corresponded with L. Ryan re same. (1.0)	2.1	A. Herren	\$ 225.00	\$ 472.50	\$ -	\$ 225.00	\$ -	\$ -	\$ 247.50	\$ -	\$ -	\$ -	\$ -	\$ -
11/30/2018	Continued work to takeover Electronic Data Hosts accounts, including creating telephone number for customer inquiries, takeover of Studora website, updating case email response in both E3 and Studora email server, creating MailChimp account for sending case updates, updating case website and preparing summary memo for K. Freitag to reflect details of work completed. (4.6)	4.6	G. Rodriguez	\$ 256.50	\$ 1,179.90	\$ -	\$ -	\$ -	\$ -	\$ 1,179.90	\$ -	\$ -	\$ -	\$ -	\$ -
11/30/2018	Conferred with Intuit customer service and legal department re subscriptions. (2.1) Conferred with Chase legal and branch office, researched accounts and served additional notice. (1.9) Continued to work on creating vendor list from bank statements. (1.8) Corresponded with merchant providers and updated bank log. (1.0)	6.8	L. Ryan	\$ 121.50	\$ 826.20	\$ -	\$ 486.00	\$ -	\$ -	\$ 340.20	\$ -	\$ -	\$ -	\$ -	\$ -
11/30/2018	Assisted with getting dedicated phone line. (.4)	0.4	T. Hebrank	\$ 256.50	\$ 102.60	\$ -	\$ -	\$ -	\$ -	\$ 102.60	\$ -	\$ -	\$ -	\$ -	\$ -
12/3/2018	Continued follow-up on payment processors. (.2) Checked consumer voicemails; coordinated responses. (.4) Noticed order on what appears to be Colombian personnel. (.2) Reviewed and revised creditor list; prepared exhibit for same. (1.8) Coordinated correction of wrong entity freeze. (.1) Downloaded files. (.2)	2.9	K. Freitag	\$ 292.50	\$ 848.25	\$ -	\$ 146.25	\$ -	\$ 526.50	\$ 58.50	\$ 117.00	\$ -	\$ -	\$ -	\$ -
12/3/2018	Processed change of address for numerous California locations; updated tracking log; corresponded with K. Freitag re same. (.4) Distributed vendor notification letter and court order; corresponded with L. Ryan re same. (.2)	0.6	A. Herren	\$ 225.00	\$ 135.00	\$ -	\$ 90.00	\$ -	\$ -	\$ 45.00	\$ -	\$ -	\$ -	\$ -	\$ -

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	001	002	003	004	005	006	007	008	009	010
12/3/2018	Updated vendor contacts and provided same to L. Ryan. (0.2) Began efforts to notice insurance companies of PI order to take over respective accounts, including researched information re potential insurance policies and carriers and corresponded with broker re suggestions on serving copy of the Order. (0.7) Confirmed website changes made to improve communications with investors. (0.1)	1.0	G. Rodriguez	\$ 256.50	\$ 256.50	\$ -	\$ 179.55	\$ -	\$ -	\$ 76.95	\$ -	\$ -	\$ -	\$ -	\$ -
12/3/2018	Noticed Paypal, Public Storage and Zelle, updated vendor list and conferred with K. Freitag re same. (3.1) Conferred with Public Storage. (.4)	3.5	L. Ryan	\$ 121.50	\$ 425.25	\$ -	\$ 376.65	\$ -	\$ -	\$ 48.60	\$ -	\$ -	\$ -	\$ -	\$ -
12/4/2018	Conferred with various vendors and G. Rodriguez. (.6) Downloaded files; briefly reviewed same (BoFA). (1.3)	1.9	K. Freitag	\$ 292.50	\$ 555.75	\$ -	\$ -	\$ -	\$ -	\$ 555.75	\$ -	\$ -	\$ -	\$ -	\$ -
12/4/2018	Conferred at length with K. Freitag and Atty Fates re treatment of additional domains on the account, reviewed 24 out of 55 and confirmed that most sites did not point to anything and moved sites that had to do with student loans to case website. (0.7) Briefly conferred with customer re Aidnest account. (0.2) Provided listing of domains associated with Studora account to K. Freitag. (0.2)	1.1	G. Rodriguez	\$ 256.50	\$ 282.15	\$ -	\$ 230.85	\$ -	\$ -	\$ -	\$ 51.30	\$ -	\$ -	\$ -	\$ -
12/4/2018	Conferred multiple times with Chase re Paymentech. (.9) Worked on vendor list and vendor letters, researched merchants. (1.2)	2.1	L. Ryan	\$ 121.50	\$ 255.15	\$ -	\$ -	\$ -	\$ -	\$ 255.15	\$ -	\$ -	\$ -	\$ -	\$ -
12/5/2018	Conferred with Intuit attorney re: turning over access to receiver. (1.1) Performed additional review of BoFA production documents for vendors, etc. (1.0) Conferred with CFPB in response to US Debt Relief letter. (.3)	1.4	K. Freitag	\$ 292.50	\$ 409.50	\$ -	\$ 117.00	\$ -	\$ -	\$ 292.50	\$ -	\$ -	\$ -	\$ -	\$ -
12/5/2018	Distributed notification letters and court order to vendors; conferred and corresponded with L. Ryan re same. (4.5)	4.5	A. Herren	\$ 225.00	\$ 1,012.50	\$ -	\$ -	\$ -	\$ -	\$ 1,012.50	\$ -	\$ -	\$ -	\$ -	\$ -
12/5/2018	Worked on gaining access to the Ytel system using supplied login credentials including, working with Ytel support to resolve login problems, reviewed program and produced a report for K. Freitag re general call volume, provided script of calls in the system and provided a sample phone call to K. Freitag detailing employee use of the script. (1.7)	1.7	G. Rodriguez	\$ 256.50	\$ 436.05	\$ -	\$ 436.05	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
12/5/2018	Reviewed and saved FTC notice responses and updated bank log with same. (1.0) Set up QuickBooks for receivership. (.5) Corresponded multiple times with Chase re statements and logged same with other bank statements received. (.7)	2.2	L. Ryan	\$ 121.50	\$ 267.30	\$ -	\$ -	\$ -	\$ -	\$ 267.30	\$ -	\$ -	\$ -	\$ -	\$ -
12/6/2018	Met with employees to retrieve personal belongings. (3.0)	3.0	K. Freitag	\$ 292.50	\$ 877.50	\$ -	\$ 877.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
12/6/2018	Followed up with insurance carriers re noticing of receivership and corresponded with K. Freitag re same. (1.0) Reviewed and revised demand letter to BBVA Columbia in Spanish. (1.4)	2.4	G. Rodriguez	\$ 256.50	\$ 615.60	\$ -	\$ 615.60	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
12/6/2018	Researched and noticed additional vendor and updated vendor and creditor logs. (2.1) Conferred with merchants re documents and noticed same. (1.2) Corresponded multiple times with Chase re accounts and documents. (.5)	3.8	L. Ryan	\$ 121.50	\$ 461.70	\$ -	\$ 255.15	\$ -	\$ -	\$ 206.55	\$ -	\$ -	\$ -	\$ -	\$ -
12/7/2018	Reviewed numerous correspondence and responded to various requests. (.7) Followed up on insurance vendors and additional banking notices. (.4)	1.1	K. Freitag	\$ 292.50	\$ 321.75	\$ -	\$ 117.00	\$ -	\$ -	\$ 204.75	\$ -	\$ -	\$ -	\$ -	\$ -
12/7/2018	Distributed notification letters and court order to additional vendor; conferred and corresponded with L. Ryan re same. (.4) Scanned and archived mail; corresponded with K. Freitag and L. Ryan re same. (.4)	0.8	A. Herren	\$ 225.00	\$ 180.00	\$ -	\$ -	\$ -	\$ -	\$ 180.00	\$ -	\$ -	\$ -	\$ -	\$ -

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	001	002	003	004	005	006	007	008	009	010
12/7/2018	Corresponded with Electronic Data Hosts re vendor notices and provided requested information. (0.1) Reviewed photos of office equipment in attempt to coordinate auction company clean-up of the remaining office inventory. (0.3) Continued work with noticing insurance companies re receivership, including various correspondence to Nationwide, and discussion with agent there and correspondence to Hiscox re same. (0.7) Continued efforts to secure BBVA Columbia accounts, including finalizing letter in Spanish, research on serving the letter in Columbia, discussion with BBVA Compassions re process, discussion with K. Freitag re same. (2.0)	3.1	G. Rodriguez	\$ 256.50	\$ 795.15	\$ -	\$ 718.20	\$ -	\$ -	\$ 76.95	\$ -	\$ -	\$ -	\$ -	\$ -
12/7/2018	Reviewed and archived merchant statements received. (.6) Conferred and noticed additional banks. (1.5)	2.1	L. Ryan	\$ 121.50	\$ 255.15	\$ -	\$ 182.25	\$ -	\$ -	\$ 72.90	\$ -	\$ -	\$ -	\$ -	\$ -
12/10/2018	Updated and prepared vendor list for FTC, per request. (1.1) Pulled Studora merchant account details and reviewed same for analysis; provided feedback re: possible summary of total deposits. (2.4)	3.5	K. Freitag	\$ 292.50	\$ 1,023.75	\$ -	\$ -	\$ -	\$ -	\$ 1,023.75	\$ -	\$ -	\$ -	\$ -	\$ -
12/10/2018	Continued coordination of the property cleanup by auction company. (0.3) Researched email accounts and how to serve order on Microsoft and completed same requesting access to likely company email accounts. (1.1) Continued work on Electronic Data Hosts including providing information as requested by K. Freitag re specifics of Ytel and Ringcentral accounts and updated takeover of the Hostgator account. (1.2)	2.6	G. Rodriguez	\$ 256.50	\$ 666.90	\$ -	\$ 589.95	\$ -	\$ -	\$ 76.95	\$ -	\$ -	\$ -	\$ -	\$ -
12/10/2018	Conferred and faxed R Bank re notice and conferred with K. Freitag Orange and MNI accounts. (.8)	0.8	L. Ryan	\$ 121.50	\$ 97.20	\$ -	\$ 97.20	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
12/11/2018	Dealt with attempted address change at Wells by a Defendant. (1.4) Followed up with Chase re: potential fraudulent account. (.2)	1.6	K. Freitag	\$ 292.50	\$ 468.00	\$ -	\$ 468.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
12/11/2018	Scanned and archived checks received from Merchant Services; corresponded with K. Freitag and L. Ryan re same. (.4) Prepared Irvine address change. (.1)	0.5	A. Herren	\$ 225.00	\$ 112.50	\$ -	\$ 22.50	\$ -	\$ -	\$ 90.00	\$ -	\$ -	\$ -	\$ -	\$ -
12/11/2018	Completed document request for five9.com vendor (electronic data host) to take over possession of the account. (0.2) Continued work to determine appropriate strategy for delivering notice of case to Colombian bank, including translating PI Order into Spanish, finalizing letter, researching mail process in Colombia and discussion with K. Freitag re same. (1.0) Corresponded with Nationwide Insurance re results of insurance policies for J. Calderon paid for by the company and provided same information to K. Freitag. (0.2) Researched how to serve Order on Google and completed same requesting access to likely company email accounts. (0.4)	1.8	G. Rodriguez	\$ 256.50	\$ 461.70	\$ -	\$ 461.70	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
12/11/2018	Made deposit at Chase and corresponded multiple times with Chase re documents and updated bank log with responses. (1.0) Forwarded merchant contacts to T. Fates for follow up. (.1)	1.1	L. Ryan	\$ 121.50	\$ 133.65	\$ -	\$ -	\$ -	\$ -	\$ 133.65	\$ -	\$ -	\$ -	\$ -	\$ -
12/12/2018	Reviewed response from Hiscox re business policy for Capital Sun Investments and provided same to K. Freitag. (0.2)	0.2	G. Rodriguez	\$ 256.50	\$ 51.30	\$ -	\$ -	\$ -	\$ -	\$ 51.30	\$ -	\$ -	\$ -	\$ -	\$ -
12/12/2018	Conferred with attorney re vendor notice. (.2)	0.2	L. Ryan	\$ 121.50	\$ 24.30	\$ -	\$ -	\$ -	\$ -	\$ 24.30	\$ -	\$ -	\$ -	\$ -	\$ -
12/13/2018	Conferred with FTC re: general update. (.3) Attended call with Microsoft counsel re: demand for turnover. (.7)	1.0	K. Freitag	\$ 292.50	\$ 292.50	\$ -	\$ 292.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
12/13/2018	Distributed notification letters and court order to additional vendors; conferred and corresponded with L. Ryan re same. (.7)	0.7	A. Herren	\$ 225.00	\$ 157.50	\$ -	\$ -	\$ -	\$ -	\$ 157.50	\$ -	\$ -	\$ -	\$ -	\$ -

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	001	002	003	004	005	006	007	008	009	010
12/13/2018	Made changes to DNS forwarding for two websites to redirect websites to receivership website. (0.2) Briefly conferred with Hiscox re review of policy information provided. (0.1) Coordinated call with Microsoft counsel re access to Exchange accounts and participated in same conference call with K. Freitag (0.7)	1.0	G. Rodriguez	\$ 256.50	256.50	\$ -	\$ 179.55	\$ -	\$ -	\$ 76.95	\$ -	\$ -	\$ -	\$ -	\$ -
12/13/2018	Prepared and sent wire instructions to merchants. (3) Researched and noticed additional merchants per Discover response. (9) Updated vendor log with responses and corresponded with vendor re additional information. (4)	1.6	L. Ryan	\$ 121.50	194.40	\$ -	\$ 109.35	\$ -	\$ -	\$ 85.05	\$ -	\$ -	\$ -	\$ -	\$ -
12/14/2018	Distributed notification letters and court order to additional vendor; conferred and corresponded with L. Ryan re same. (4) Picked up copies of bank statements at Chase; conferred and corresponded with L. Ryan re same. (4)	0.8	A. Herren	\$ 225.00	180.00	\$ -	\$ -	\$ -	\$ -	\$ 180.00	\$ -	\$ -	\$ -	\$ -	\$ -
12/14/2018	Conferred with R Bank re accounts and document production. (2) Corresponded multiple times with vendors and updated log and noticed additional vendors. (1.4) Continued to follow up with Chase re statements. (2)	1.8	L. Ryan	\$ 121.50	218.70	\$ -	\$ -	\$ -	\$ -	\$ 218.70	\$ -	\$ -	\$ -	\$ -	\$ -
12/17/2018	Conferred with Wells and retrieved cashier's check; deposited same in receivership estate account. (7) Attended call with Microsoft re: demand for turnover. (5)	1.2	K. Freitag	\$ 292.50	351.00	\$ -	\$ 351.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
12/17/2018	Coordinated and participated in a conference call with Microsoft and K. Freitag re access to email accounts for Defendant entities and briefly conferred with K. Freitag re acceptance of Microsoft's offer. (0.5)	0.5	G. Rodriguez	\$ 256.50	128.25	\$ -	\$ 128.25	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
12/17/2018	Reviewed bank statements for vendor activity and cell phone charges. (1.8) Logged bank responses and prepared and noticed additional banks. (2.0) Corresponded with Choice and First Data re wires. (3)	4.1	L. Ryan	\$ 121.50	498.15	\$ -	\$ -	\$ -	\$ -	\$ 498.15	\$ -	\$ -	\$ -	\$ -	\$ -
12/18/2018	Worked on preliminary forensic accounting for Capital Sun Investments, LLC. (3.8)	3.8	K. Freitag	\$ 292.50	1,111.50	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,111.50
12/18/2018	Traveled to/from Santa Ana to box records. (4.0)	4.0	A. Herren	\$ 112.50	450.00	\$ -	\$ -	\$ -	\$ -	\$ 450.00	\$ -	\$ -	\$ -	\$ -	\$ -
12/18/2018	Prepared and documented Santa Ana office documents for storage; met with Iron Mountain representative re same; conferred and corresponded with K. Freitag re same. (4.0) Met with Parks Coffee representative re pickup of leased coffee machine; conferred with K. Freitag re same. (5)	4.5	A. Herren	\$ 225.00	1,012.50	\$ -	\$ -	\$ -	\$ -	\$ 1,012.50	\$ -	\$ -	\$ -	\$ -	\$ -
12/18/2018	Further coordination with auction company re timing for removal of personal property at the leased space. (0.2) Further discussion with Nationwide insurance and provided additional requested information re policy payments. (0.3)	0.5	G. Rodriguez	\$ 256.50	128.25	\$ -	\$ 76.95	\$ -	\$ -	\$ 51.30	\$ -	\$ -	\$ -	\$ -	\$ -
12/18/2018	Conferred with Payliance and prepared and noticed same and made documents request. (8)	0.8	L. Ryan	\$ 121.50	97.20	\$ -	\$ -	\$ -	\$ -	\$ 97.20	\$ -	\$ -	\$ -	\$ -	\$ -
12/19/2018	Worked on preliminary forensic accounting for Capital Sun Investments, LLC. (1.3)	1.3	K. Freitag	\$ 292.50	380.25	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 380.25
12/19/2018	Conferred with multiple vendors, updated log and noticed additional vendor. (1.5) Conferred multiple times with Chase re signature card and accounts. (3) Prepared and noticed Comerica and updated bank log. (1.0) Researched and corresponded with merchant re wire. (3)	3.1	L. Ryan	\$ 121.50	376.65	\$ -	\$ -	\$ -	\$ -	\$ 376.65	\$ -	\$ -	\$ -	\$ -	\$ -
12/20/2018	Briefly reviewed and provided Madera production documents to FTC, as requested. (9) Downloaded bank account activity. (4) Provided signature card. (1)	1.4	K. Freitag	\$ 292.50	409.50	\$ -	\$ -	\$ -	\$ -	\$ 409.50	\$ -	\$ -	\$ -	\$ -	\$ -
12/20/2018	Distributed notification letters and court order to additional vendors; conferred and corresponded with L. Ryan re same. (4)	0.4	A. Herren	\$ 225.00	90.00	\$ -	\$ 90.00	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
12/20/2018	Continued to follow up with merchants. (4)	0.4	L. Ryan	\$ 121.50	48.60	\$ -	\$ -	\$ -	\$ -	\$ 48.60	\$ -	\$ -	\$ -	\$ -	\$ -

Date	Description of Services	Hours	Personnel	Per Hour	Total Fee	001	002	003	004	005	006	007	008	009	010
12/21/2018	Conferred with vendor and updated response log. (.6) Downloaded R Bank documents and logged response. (.5)	1.1	L. Ryan	\$ 121.50	\$ 133.65	\$ -	\$ -	\$ -	\$ -	\$ 133.65	\$ -	\$ -	\$ -	\$ -	\$ -
12/24/2018	Scanned and archived Merchant Services chargeback letters received; corresponded with L. Ryan re same. (.6)	0.6	A. Herren	\$ 225.00	\$ 135.00	\$ -	\$ -	\$ -	\$ -	\$ 135.00	\$ -	\$ -	\$ -	\$ -	\$ -
12/26/2018	Began research on Impetus rent payment. (.6)	0.6	K. Freitag	\$ 292.50	\$ 175.50	\$ -	\$ -	\$ -	\$ -	\$ 175.50	\$ -	\$ -	\$ -	\$ -	\$ -
12/27/2018	Reviewed and archived merchant documents. (.4)	0.4	L. Ryan	\$ 121.50	\$ 48.60	\$ -	\$ -	\$ -	\$ -	\$ 48.60	\$ -	\$ -	\$ -	\$ -	\$ -
12/28/2018	Met with auction company/movers and property management re: moveout. (4.8)	4.8	K. Freitag	\$ 292.50	\$ 1,404.00	\$ -	\$ -	\$ -	\$ -	\$ 1,404.00	\$ -	\$ -	\$ -	\$ -	\$ -
12/28/2018	Recorded cash activity and merchant funds received to date. (.6) Recorded accounts payable and prepared payment. (.4) Updated vendor log with additional responses. (.2)	1.2	L. Ryan	\$ 121.50	\$ 145.80	\$ -	\$ -	\$ -	\$ -	\$ 145.80	\$ -	\$ -	\$ -	\$ -	\$ -
Total November 2018 - December 2018 Fees		259.0			\$ 58,590.00	\$ -	\$ 32,226.75	\$ 487.35	\$ 4,084.20	\$ 19,488.15	\$ 811.80	\$ -	\$ -	\$ -	\$ 1,491.75

Date	Description	Expense
11/16/2018	Change of Address	\$ 21.00
11/27/2018	Mail Retrieval	\$ 203.00
11/30/2018	RingCentral, Inc.	\$ 3.51
11/30/2018	FedEx - November 18	\$ 43.19
11/30/2018	Copies - November 18	\$ 61.35
12/4/2018	Postage - mailing	\$ 50.00
12/4/2018	Receiver's Bond	\$ 171.00
12/4/2018	Website SetUp/Updates - November 18	\$ 552.50
12/4/2018	Change of Address	\$ 1.00
12/5/2018	Mail Retrieval	\$ 202.00
12/13/2018	Parking	\$ 3.75
12/31/2018	Postage - December 18	\$ 25.78
12/31/2018	Copies - December 18	\$ 307.80
	SETEC	\$ 3,586.48
Total		\$ 5,232.36