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10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**

12
13
14 SECURITIES AND EXCHANGE
15 COMMISSION,

16 Plaintiff,

17 v.

18 LOUIS V. SCHOOLER and FIRST
19 FINANCIAL PLANNING
20 CORPORATION d/b/a WESTERN
21 FINANCIAL PLANNING
22 CORPORATION,

23 Defendants.

Case No.: 3:12-cv-02164-GPC-JMA

**ARDIZZONE INVESTORS’
OPPOSITION TO 14TH AND 15TH
INTERIM FEE APPLICATIONS BY
THOMAS C. HEBRANK AND
ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP**

Date: September 16, 2016

Time: 1:30 p.m.

Dept.: 2D

Judge: Hon. Gonzalo P. Curiel

1 I. Introduction

2 The Ardizzone Investors¹ oppose the 14th and 15 interim fee applications by
3 Thomas C. Hebrank (“Hebrank”) and Allen Matkins Leck Gamble Mallory & Natsis
4 LLP (“Allen Matkins”) fee applications (Dkt. Nos. 1327-1330). In doing so, the
5 Ardizzone Investors rely primarily on Hebrank’s filings in this case to establish the
6 legal principles and facts. Hebrank has recognized in words but not actions his duty to
7 protect the receivership assets and to maximize the return to investors. In truth, he has
8 served his own financial interests by serving as the SEC’s co-counsel and co-
9 prosecutor. In each case where the SEC’s interests conflicted with those of investors,
10 the latter were thrown under the bus.

11 We might not make this claim if investors were only run over only once. But it
12 has happened again and again and each time just after the SEC gave Hebrank guidance.
13 And we can be specific. After the Court’s findings undermined the SEC’s theory of
14 subject matter jurisdiction, the SEC and Hebrank collaborated on how to continue the
15 receivership without a hearing on its fatal flaw (subject matter jurisdiction over the
16 GPs) and how to deprive investors of their rights to challenge this fatal flaw. In the
17 same manner, the SEC, Hebrank, and Allen Matkins collaborated to preserve the myth
18 they were protecting investors.

19 The simple truth is that the SEC desperately needed Hebrank to help it prove its
20 shaky claims against the defendants. In acting as the SEC’s deputy, Hebrank breached
21 his duties to investors through he claimed each breach was done to protect investors and
22 receivership assets. When he stripped investors of their rights to notice, it was done to
23 save money. When he secretly sold GP property through under-seal filings and redacted
24 orders, he did it to get the best price. When he misled investors regarding his receipts

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26 ¹ We use “Ardizzone Investors” throughout this brief to refer to the investors bringing
27 this motion: Joseph M. Ardizzone, David R. Schwarz, Lois Schwarz, Dennis Frisman,
28 Eric Gilbert, and Rick Moore.

1 and disbursements, he praised himself for stopping the process. We marvel at his ability
2 to spin every violation of investors' rights into something noble. Rumpelstiltskin would
3 be envious.

4 **II. Investors Have Right to (1) Notice and Object to Fee Applications under**
5 **Local Rule 66.1.f and (2) to Intervene under Fed. R. Civ. P. 24(a).**

6 Investors have the right to notice and to object to Hebrank's and Allen Matkins'
7 fee applications under both Local Rule ("L.R.") 66.1.f and Fed. R. Civ. P. 24(a). L.R.
8 66.1.f mandates the receiver to give "interested parties" 14-day notice of "applications
9 for fees of the receiver or the attorney." Investors are "interested parties" in relation to
10 fee applications. *SEC v. Vassallo*, 2015 U.S. Dist. LEXIS 172188 (E.D. Cal. Dec. 16,
11 2015). The notice requirements of L. R. 66.1.f would make no sense unless the
12 "interested parties," such as the Ardizzone Investors, could interpose their objections to
13 the fee application.

14 Separately, the Ardizzone Investors have satisfied each requirement for
15 mandatory intervention under Fed. R. Civ. P. 24(a). Citing *Donnelly v. Glickman*, 159
16 F.3d 405, 409 (9th Cir. 1998), this Court confirmed the four-part test to determine
17 intervention as a matter of right should be granted in *In re Novatel Wireless Sec.*
18 *Litigation*, No. 08-cv-1689, 2014 U.S. Dist. LEXIS 85994, at *5-6 (S.D. Cal. 2014):

19 (1) the applicant must assert a significantly protectable interest relating to
20 the party or transaction that is the subject of the action; (2) the applicant's
21 interest must be inadequately represented by the parties to the action; (3)
22 disposition of the action without intervention may as a practical matter
23 impair or impeded its ability to protect that interest; and (4) the applicant's
24 motion must be timely.

25 The Court's May 18, 2016, order held that the motion to intervene brought by a
26 prior group of investors, represented by the same counsel, satisfied all requirements for
27 intervention under Fed. R. Civ. P. 24(a), except timeliness. Dkt. No. 1296 at 4-5. The
28 Ardizzone Investors rely on the same evidence and the same law as the prior investor

1 group to satisfy the same three elements of Fed. R. Civ. P. 24(a): protectable interest, no
2 adequate representative, and impairment. Accordingly, the SEC and Hebrank are barred
3 from re-litigating these three issues under the doctrines of collateral estoppel and issue
4 preclusion, *Hydranautics v. FilmTec Corp.*, 204 F.3d 880, 885 (9th Cir. 2000), and law
5 of the case, *Arizona v. California*, 460 U.S. 605, 618 (1983). The only open issue is
6 timeliness. In that regard, we have timely filed our opposition within the period
7 permitted by the local rules.

8 **III. Legal Standards**

9 In its first fee application, Allen Matkins cited *U.S. v. Code Prods. Corp.*, 362 F.
10 2d 669, 673 (3d Cir. 1966) for its statement of the factors the Court should consider in
11 allowing fees:

12 [T]he time, labor and skill required, but not necessarily that actually
13 expended, *in the proper performance of the duties imposed by the court*
14 upon the receiver[], the fair value of such time, labor and skill measured by
15 conservative business standards, the degree of activity, integrity and
dispatch with which the work is conducted and the result obtained.

16 Dkt. No. 64 at 5.

17 Applying these factors, no award of fees should be made. All of these factors
18 relate to the manner in which Hebrank and Allen Matkins carried out the primary
19 objective of the receivership. Hebrank described that objective to the Court as follows,
20 “The Receiver asserts his objective is to preserve and protect all receivership assets,
21 maximize the recovery for all investors, and if authorized by the Court, distribute assets
22 in a fair and equitable manner.” Dkt. No. 470 at 19. Applying the four factors of *Code*
23 *Prods. Corp.*, Hebrank’s and Allen Matkins’ fee application must be denied, because
24 (1) neither properly performed the duties imposed by the Court; (2) their services did
25 not bring value to investors; (3) their services were not performed with integrity; and
26 (4) the result obtained for investors was a disaster.

1 **IV. The “Result Obtained” Could Hardly Be Worse**

2 We address the last factor first. It is challenging to conceive how the “result
3 obtained” could be worse. The SEC and Hebrank persuaded the Court to keep the GPs
4 in the receivership, because the SEC expected to recover a big chunk of a large
5 judgment against Schooler and Western. Once again, the SEC and Hebrank were only
6 thinking of investors: “releasing the GPs would prohibit those GPs’ investors from
7 recovering from any distribution plan that may be instituted in this case.” Dkt. No. 1003
8 at 11. The Court agreed with the SEC and Hebrank and thus kept the GPs in the
9 receivership over the screams of investors: “Let us out.” It is now clear there will be no
10 bounty. Hebrank has expressed his pessimism about any recovery from Defendant
11 Louis Schooler. Dkt. No. 1181-1 at 8. Hebrank and Allen Matkins should know because
12 they obtained financial statements at the outset of this case pursuant to the Court’s
13 order. Dkt. No. 211. Likewise Hebrank and Allen Matkins now project a recovery of
14 only \$1.2 million from Western (Dkt. No. 1181-1 at 13), though the Court in its March
15 3, 2015, order contemplated a recovery from Western of \$4.6 million. Dkt. No. 1003 at
16 19.

17 Instead of delivering a gain to investors or even preserving the receivership’s
18 assets, the “result obtained” by Hebrank’s and Allen Matkins’ receivership is a massive
19 loss to investors. The only uncertainty is the amount of that loss, which is between \$15
20 million and \$20 million. We cannot be more concrete about the loss, because Hebrank
21 and Allen Matkins have managed to file meaningless financial reports with the Court
22 from September 2012 through the first quarter of 2016. The first report to present any
23 meaningful information regarding the receivership gross receipts and disbursements is
24 the last one they filed, the Sixteenth Interim Report, Dkt. No. 1353, Ex. B. This appears
25 to be the first interim report Hebrank and Allen Matkins have ever filed that states how
26 much money Hebrank received and spent, where it came from, why it was paid, how it
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1 was spent, and to whom it was paid. In short, it took Hebrank and Allen Matkins three
2 and a half years to file a meaningful financial statement with this Court.

3 On the losses to investors, approximately 95% of the funds Hebrank spent came
4 from (1) the GPs in which investors hold 94% of the financial interests, and (2) directly
5 or indirectly from investors. Investors continued to contribute funds to the GPs and to
6 Western, because Hebrank repeatedly told them they had a duty to do so under the
7 agreements with Western. Investors were severely prejudiced by the order staying suits
8 against Western.

9 In view of the SEC's summary judgment establishing the GPs were securities
10 issued in violation of Section 5 of the Securities Act, investors could have sued Western
11 under Section 12(1)(a) of the Securities Act of 1933 for the sale of unregistered
12 securities and sought an order cancelling their note obligations. See: *In re Elec. Data*
13 *Sys. Corp. "ERISA" Litig.*, 224 F.R.D. 613, 619 (E.D. Tex. 2004) ("Plaintiffs bring a
14 claim under Securities Act section 12(a)(1) seeking rescission of all unregistered stock
15 purchases..."). But that could not happen because of the stay order. Instead, the Court's
16 August 16, 2013, order directed "the Receiver to continue the collection of payments on
17 the loans Western made to the GPs to finance the purchase of GP units and to cover
18 shortfalls in operational funds." Dkt. No. 470 at 26. To raise these funds, Hebrank
19 pressed investors to pay operational fees and repay the notes they signed. Hebrank's
20 revised 14th Interim Report suggests investors may have paid another \$13.686 million
21 during the receivership. Dkt. No. 1315, Exhibit C at 16, line 8. Ultimately, Hebrank
22 used some of these funds to pay fees to himself and his attorneys. Dkt. No. 1292 at 14.

23 **V. Hebrank and Allen Matkins Failed to Advise the Court It Lacked Subject**
24 **Matter Jurisdiction**

25 Few law firms have more experience in receivership cases than Allen Matkins.
26 The law firm is intimately familiar with the limitations of subject matter jurisdiction and
27 due process on the Court's powers. See for example, *SEC v. Ross* 504 F.3d 1130 (9th
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1 Cir. 2007), a case where Allen Matkins represented the receiver, which was reversed
2 because of due process violations. It must have been self-evident to Allen Matkins that
3 this Court undermined its factual basis for subject matter jurisdiction when it expressly
4 rejected the SEC's theory for subject matter jurisdiction, i.e., that Western controlled
5 the GPs. Dkt. No. 44 at 7-10.

6 Knowing the Court lacked subject matter jurisdiction under the SEC's asserted
7 grounds and controlling case law, Hebrank and Allen Matkins did not merely stay
8 silent. They found a way to continue the receivership even though the Court had no
9 subject matter jurisdiction. They took three steps, all of which violated investors' due
10 process rights. First, with no notice to investors, they obtained a partial waiver of L.R.
11 66.1. Second, they ignored the other requirements of L.R. 66.1 designed to protect
12 investors, including L.R. 66.1.a.2, which requires notice and a hearing before Hebrank
13 could be appointed permanent receiver. In particular, they negotiated with the SEC and
14 Defendants to eliminate any notice to investors under L.R. 66.1.a.2. Additionally,
15 Hebrank and Allen Matkins committed a third violation of investors' due process rights
16 by stipulating to the appointment of Hebrank as permanent receiver without giving
17 investors prior notice under L.R. 66.1.a. Dkt. Nos. 60, 62, 70-73 and 75.

18 We agree that Hebrank and Allen Matkins used their skill and familiarity with the
19 procedural rules that apply to receiverships. Unfortunately, they used those skills and
20 experience to perpetuate the receivership even though the Court lacked subject matter
21 jurisdiction.

22 **VI. Hebrank and Allen Matkins Collaborated to Deprive Investors of Their** 23 **Rights**

24 The Ardizzone Investors addressed Hebrank's and Allen Matkins' violations of
25 the notice provisions of investors' rights to due process of law in their motion to
26 intervene. Dkt. No. 1348 at 4-13. We see no purpose in restating those arguments here,
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1 since the Court has already ruled on them. We urge those grounds here solely to present
2 the issue for the purpose of appeal.

3 **VII. Hebrank and Allen Matkins Misstated the Law and Facts in Recommending**
4 **their Liquidation Plan**

5 Hebrank and Allen Matkins misstated the law and facts to the Court in their
6 motion for approval of the liquidation plan (Dkt. No. 1181) by claiming the Court had
7 power to void the GP agreements, sell off the GP properties, pool the sale proceeds, and
8 distribute those funds in violation of the GP agreements. It is clear from the Court's
9 May 25, 2016, order that it relied on Hebrank's and Allen Matkins' factual and legal
10 contentions in approving the Receiver's plan. Dkt. No. 1304 at 5, 9-10, 16,18-20, 22-23,
11 26-27, and 29. Hebrank's plan effectively voids investors' rights under the GP
12 agreements. Hebrank sells all GPs' realty, pools the proceeds of those sales and, in
13 violation of the GP agreements, distributes those funds to strangers. The Court relied
14 upon Hebrank and Allen Matkins, because of the expertise they claim in SEC
15 receivership cases and their purported commitment to protect investors' interests.
16 Hebrank's and Allen Matkins' recommendations thereby distorted applicable legal
17 principles and the actual facts in the case to investors' detriment. We will not go into
18 these issues, because the Court ruled against an earlier investor group who made the
19 same argument in opposing Hebrank's plan. Dkt. Nos. 1229, 1235, 1258, 1293 and
20 1297. We merely raise the issue in this opposition to preserve our rights to appellate
21 review.

22 **VIII. Hebrank and Allen Matkins Have Acted as the SEC's Alter Ego to**
23 **Investors' Detriment**

24 The Ardizzone Investors established that Hebrank-Allen Matkins is the SEC's
25 alter ego by their emails. Those emails prove the SEC directed Hebrank to take actions
26 directly in conflict with his duties to investors, e.g., when the SEC told him not to
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1 propose alternatives that would allow the GPs to exit the receivership. Dkt. No. 1348 at
2 9-12. Based on these emails the Court ordered Hebrank:

- 3
- 4 2. The Receiver is ordered to refrain from seeking input on his briefs from
5 a single party. If he wishes to seek input on his briefs, he must seek input
6 from both the SEC and Defendants. The Receiver is of course still free
7 to not seek input from any party if he believes that to be the appropriate
8 course of action; and
- 9 3. The Receiver is ordered to refrain from altering the legal conclusions in
10 his briefs to fit the case strategy of either the SEC or Defendants. All
11 legal conclusions must be his own.

12 Dkt. No. 1004 at 12.

13 Nothing has changed since this order. The SEC continues to direct Hebrank on
14 every significant issue in this case; Hebrank and Allen Matkins carry out those
15 instructions as good soldiers. The billing records for the periods before² and after³ the
16 Court's order (Dkt. No. 1004) continue to show constant consultation between the SEC
17 and Hebrank-Allen Matkins before each significant motion presented to the Court.
18 Aguirre Decl., ¶ 3, Ex. 1. Both have walked in lockstep from the first call of
19 Ardizzone's counsel to Allen Matkins on January 5, 2016,⁴ through the last billing entry
20 in the first quarter of 2016.⁵ The billing records reveal that Allen Matkins, Hebrank and
21 the SEC immediately and jointly circled their wagons to stop investors from getting a
22 procedural foothold in this case. From that point on, the SEC, Hebrank and Allen
23 Matkins decided the best way to keep investors in the dark was to wind up the
24 receivership as quickly as possible.⁶

25 ² Aguirre Decl., Ex. 1 Entries Nos. 1 through 196.

26 ³ *Id.*, Entries Nos. 197 through 247.

27 ⁴ *Id.*, Entry No. 222.

28 ⁵ *Id.*, Entry No. 247.

⁶ *Id.*, Entry Nos. 222 to 241.

1 We can find no evidence in the billing records of any significant effort to come
2 up with a distribution plan before January 5, 2016, when the Ardizzone Investors'
3 counsel called Allen Matkins.⁷ And from that point on, there was a concerted effort to
4 get Hebrank's proposed liquidation plan on file as soon as possible.⁸ The SEC and
5 Hebrank vigorously opposed any effort by any group of investors to have a voice in
6 what was done with their assets. They have largely succeeded in silencing investors.
7 The case is now on appeal. Until the ninth Circuit speaks on the law and the facts we
8 have presented establishing that Hebrank and Allen Matkins served as the SEC's alter
9 ego, rather than investors' protectors, we submit no further interim fee requests should
10 be approved.

11 DATED: September 2, 2016

Respectfully submitted,

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14 By: /s/ Gary J. Aguirre
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Aguirre Law, A.P.C.

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16 gary@aguirrelawapc.com

17 Attorney for Investors Joseph M.
18 Ardizzone, David R. Schwarz,
19 Lois Schwarz, Dennis Frisman, Eric
20 Gilbert, and Rick Moore

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⁷ *Id.*, Entry No. 222.

27 ⁸ *Id.*, Entry No. 222-241.
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9 Attorney for Investors Joseph Ardizzone, David R. Schwarz,
10 Lois Schwarz Dennis Frisman, Eric Gilbert, and Rick Moore

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13 **UNITED STATES DISTRICT COURT**
14 **SOUTHERN DISTRICT OF CALIFORNIA**

15 SECURITIES AND EXCHANGE
16 COMMISSION,
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19 LOUIS V. SCHOOLER and FIRST
20 FINANCIAL PLANNING
21 CORPORATION d/b/a WESTERN
22 FINANCIAL PLANNING
23 CORPORATION,
24 Defendants.

Case No.: 3:12-cv-02164-GPC-JMA

**DECLARATION OF GARY J.
AGUIRRE IN SUPPORT OF
ARDIZZONE INVESTORS'
OPPOSITION TO 14TH AND 15TH
INTERIM FEE APPLICATIONS BY
THOMAS C. HEBRANK AND
ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP**

Date: September 6, 2016
Time: 1:30 p.m.
Ctrm: 2D
Judge: Hon. Gonzalo P. Curiel

1 I, Gary J. Aguirre, of San Diego, California, declare:

2 1. I have personal knowledge of the facts set forth in this declaration and, if
3 called as a witness, could and would testify competently to such facts under oath.

4 2. I am the attorney for Joseph M. Ardizzano, David R. Schwarz and Lois
5 Schwarz, Dennis Frisman, Eric Gilbert, and Rick Moore investors in general partnerships
6 subject to the receivership in this matter.

7 3. Excerpts from the first through the fifteenth interim fee applications filed in
8 this case by Thomas C. Hebrank (“Hebrank”), Receiver, and Allen Matkins Leck Gamble
9 Mallory & Natsis LLP (“Allen Matkins”) referring to communications between Hebrank
10 or Allen Matkins and the SEC are attached hereto and incorporated herein as Exhibit 1.

11 Executed this 2nd day of September 2016, at Elche, Spain.

12 I declare under penalty of perjury under the laws of the United States that the
13 foregoing is true and correct.

14 /s/ Gary J. Aguirre
15 GARY J. AGUIRRE
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Exhibit List

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Exhibit 1.....4

	Date	Description Services	Hours	Personnel	Dkt. No.
1	9/4/12	Met with SEC representatives...		Hebrank	63
2	9/6/12	Communications with SEC's counsel		Fates	64
3	9/7/12	Call with SEC regarding data server/drive imaging issues	0.3	Fates	64
4	9/7/12	Conf calls with SEC		Hebrank	63
5	9/10/12	Call with SEC's counsel regarding investor note payments and employee access		Fates	64
6	9/10/12	Met with S. Brookman on N/R from investors, ACH collections process. Discuss with Atty Fates and SEC (1.4);...C/C with SEC on open issues (.4)		Hebrank	63
7	9/11/12	Review SEC and Defendant motions. Discuss with Atty. Fates and SEC...		Hebrank	63
8	9/12/12	Contact banks re: balances and signatories. Discuss issues with SEC.	1.7	Hebrank	63
9	9/13/12	Review drafts of Receivers report. Discuss with Atty Fates and SEC.	1.5	Hebrank	63
10	9/14/12	Prepare exhibits for Receiver Report. Make changes, review and sign final report. Discussions with Atty. Fates and SEC re: same	4	Hebrank	63
11	9/17/12	Meet with SEC's counsel in advance of hearing (.5)	0.5	Fates	64
12	9/17/12	Met with Atty Fates and SEC		Hebrank	63
13	9/20/12	Communications with SEC's counsel, review order regarding settlement conference, call with SEC's counsel regarding terms of tentative settlement, and discuss same with Receiver and D. Zaro (1.4);...	1.4	Fates	64
14	9/20/12	Conf call with SEC	0.7	Hebrank	63
15	QA	Review proposed stipulation from Schooler and discuss same with Receiver (.3); call with SEC's counsel regarding same (.2);	0.5	Fates	64
16	9/26/12	Discuss Western cash flow concerns and possible solutions with Receiver and review cash spreadsheet (.8); call with SEC's counsel regarding same (.2)	1	Fates	64
17	9/26/12	...review and discuss cash flow. Review GP documents relating to trust deeds. Review cash flow projections with T. Harris. Discuss with Atty. Fates and SEC	2.6	Hebrank	63
18	9/27/12	Communications with American West Bank, Receiver and SEC's counsel regarding asset freeze and Schooler's loan payments	0.6	Fates	64

19	9/27/12	Discuss cash flow and operational expense issues with Receiver, SEC's counsel, and law clerk; communications with Schooler's counsel re same.	4.4	Fates	64
20	9/27/12	Review cashflow situation. Request additional documentation relating same. Discuss with Atty. Fates and SEC (1.1);	1.1	Hebrank	63
21	9/28/12	Discuss cash flow and operational expense issues with Receiver and SEC's counsel;...		Fates	64
22	10/5/12	Review motion to dismiss SEC's complaint filed by Schooler; review preliminary injunction order and discuss same with Receiver; arrange call with SEC's counsel	2.1	Fates	176
23	10/9/12	Conf call with SEC		Hebrank	175
24	10/10/12	Communications with Receiver and SEC's counsel regarding receivership issues	0.3	Fates	176
25	10/11/12	Meetings and communications with Receiver and Schooler's counsel regarding status of receivership, asset freeze, monitor role, and letter to investors; call and emails with SEC's counsel regarding same.	4.9	Fates	176
26	10/11/12	Site visit. Met with Defendants and counsel re: operations and monitor role. Discuss same with SEC and Atty Fates...		Hebrank	175
27	10/12/12	Call with Receiver and SEC's counsel regarding assets of Western and Schooler, receivership and monitoring issues.	0.8	Fates	176
28	10/12/12	Conf call with SEC, discussions with Atty Fates re: receivership/monitor role. Follow up on documents (1.3)		Hebrank	175
29	10/16/12	Work on Receiver's report and proposal; discuss same with Receiver; communications with SEC's counsel regarding same		Fates	176
30	10/17/12	Review and discuss stipulation regarding modification of asset freeze with Receiver and SEC's counsel	0.6	Fates	176
31	10/18/12	Communicaitons with Receiver and SEC's counsel regarding [work on second report and proposal]; review SEC's brief in support	4.7	Fates	176
32	10/19/12	Review email and voicemail from reporter with inquiries about Western and WFP; discuss same with Receiver and SEC's counsel.	0.4	Fates	176
33	11/6/12	T/C with SEC	0.3	Hebrank	175

34	11/7/12	Review Schooler's application for ruling on proposal; discuss same with Receiver and SEC's counsel.	0.8	Fates	176
35	11/13/12	Communications with Receiver and SEC's counsel regarding LinMar-related issues and letters from general partner Coopersmith;...		Fates	176
36	11/13/12	Conf call with SEC, Atty Fates on outstanding issues		Hebrank	175
37	11/15/12	Investor correspondence. Discuss with Atty Fates and SEC	0.5	Hebrank	175
38	11/28/12	Communications with SEC's counsel regarding Western employee issue; arrange conference call regarding same	0.2	Fates	176
39	11/28/12	Review proposed stipulation regarding unfreezing of Schooler's personal assets; draft suggested edits; discuss same with Receiver and SEC's counsel	0.9	Fates	176
40	11/29/12	Calls with Receiver and SEC's counsel regarding investor communications with Western's employees and related issues.	0.8	Fates	176
41	11/29/12	T/C with SEC and Atty Fates re: investor and operational issues. Follow up	0.8	Hebrank	175
42	12/3/12	Call with SEC's counsel regarding [order re report and proposal]		Fates	176
43	12/3/12	Conf call with SEC re: [Court order]		Hebrank	175
44	12/4/12	Review proposed preliminary injunction order sent by SEC's counsel; discuss same and bank accounts to be frozen with Receiver and SEC's counsel.	0.9	Fates	176
45	12/6/12	Discuss terms of proposed preliminary injunction order with Receiver and SEC's counsel	0.4	Fates	176
46	12/6/12	Discuss status of operational issues and asset recovery efforts with Receiver and SEC's counsel;		Fates	176
47	12/7/12	Discuss issues regarding terms of proposed preliminary injunction order with Receiver and SEC's counsel	1.3	Fates	176
48	12/7/12	Conf call with SEC on issues		Hebrank	175
49	12/17/12	Discuss issues regarding appraisals and operational issues with SEC's counsel	0.2	Fates	176
50	12/19/12	Discuss status/timing regarding Schooler's response to proposed Preliminary Injunction Order with SEC's counsel and Receiver	0.2	Fates	176
51	12/19/12	Arrange call with SEC's counsel		Fates	176
52	12/20/12	Call with SEC counsel regarding [plan re office lease, employees, tax returns and related issues]		Fates	176

53	12/20/12	Discuss [operations going forward, defendant operational plan, personnel, space, IT requirements, etc.] with Atty Fates, G. Rodriguez, SEC		Hebrank	175
54	12/27/12	Review Schooler's objection and proposed changes to Preliminary Injunction Order; discuss same with Receiver; communications with SEC's counsel regarding deadline to file responses;...		Fates	176
55	1/3/13	Continue work on response to Schooler's objections to proposed preliminary injunction order (1.7); discuss same with D. Zato and SEC's counsel (.4)	2.1	Fates	198
56	1/4/13	Continue work on response to Schooler's objections to proposed preliminary injunction order (1);... discuss same with SEC's counsel (.2)	1.2	Fates	198
57	1/7/13	Discuss Schooler's objections to proposed preliminary injunction order with SEC's counsel	0.2	Fates	198
58	1/14/13	Communications with SEC's counsel regarding timing of filing previously lodged documents	0.2	Fates	198
59	1/16/13	Review email from SEC counsel regarding possible additional GP. Discuss same with Receiver	0.3	Fates	198
60	1/18/13	Communications with SEC's counsel	0.2	Fates	198
61	2/4/13	...discuss automobiles with SEC counsel,...		Fates	198
62	2/5/13	Discuss need to limit costs of notice with Receiver(.3); discuss Motion for Relief from Local Rule 66 with K. Bui (.6); review and revise website posting and discuss communication to SEC's counsel regarding same with Receiver (.4)	1.3	Fates	198
63	2/5/13	Draft and have posted website updates. Correspond with SEC re: same	1	Hebrank	197
64	2/7/13	Revise motion regarding local rule requirements (.4); discuss same with SEC's counsel (.2)	0.6	Fates	198
65	2/8/13	Discuss motion regarding relief from local rule and related issues with SEC's counsel (.2); finalize same (.2)	0.4	Fates	198
66	2/9/13	Communications with SEC's counsel regarding fee applications	0.1	Fates	198
67	2/13/13	Update with SEC	0.3	Hebrank	197
68	2/14/13	Discuss status regarding automobiles and goldcoins with SEC's counsel	0.2	Fates	198
69	2/15/13	Discuss case with SEC	0.2	Hebrank	197
70	2/20/13	discuss [motion re sale of automobiles] with SEC's counsel	0.2	Fates	198

71	3/6/13	Discuss motion to sell cars and gold coins with SEC's counsel	0.2	Fates	198
72	3/6/13	Communications with SEC's counsel regarding whether hearing on fee applications will be held.	0.1	Fates	198
73	3/8/13	Discuss Court orders with SEC's counsel	0.1	Fates	198
74	3/18/13	Telephone call to clerk regarding miscellaneous filing of receivership order.	0.1	Fates	198
75	3/20/13	Discuss filing of preliminary injunction in Arizona district court, LinMar loans , and other issues with SEC's counsel	0.3	Fates	198
76	3/20/13	Discuss Real Asset Locators with SEC's counsel, prepare access letter, and discuss same with Receiver (.6)	0.6	Fates	198
77	3/21/13	...review and finalize SEC access letter	0.2	Fates	198
78	3/22/13	Finalize SEC access letter regarding RAL documents	0.3	Fates	198
79	3/27/13	Met with forensic team re: report. Review documents. Discuss with Atty Fates and SEC	2.1	Hebrank	197
80	3/28/13	Discuss access letter and timing for conference call with SEC's counsel	0.1	Fates	198
81	4/2/13	Prepare for and attend conference call with SEC re exhibits flowcharts and detailed spreadsheets for the Receiver's Forensic Report #1.		Hoslett	477
82	4/8/13	Download and review documents from SEC relating to Real Asset Locators	0.7	Fates	478
83	4/8/13	Assist in preparing fee application for local counsel in Nevada; discuss same with Receiver; send same to SEC's counsel	0.8	Fates	478
84	4/9/13	Update exhibits for formatting name issues as requested by the SEC and Mr. Hebrank.		Hoslett	477
85	4/11/13	Communications with SEC's counsel regarding position on fee application		Fates	478
86	4/22/13	T/C with SEC	0.4	Hebrank	477
87	4/23/13	Review spreadsheet showing analysis of appraisals, loan balances, estimated cost of sale, etc. for GP properties, discuss same with Receiver and SEC's counsel,...		Fates	478
88	4/23/13	Prepare for, adjust schedules and hold conf call with SEC and Atty Fates on receivership	2	Hebrank	477
89	5/23/13	Discuss motion regarding LinMar loans with Receiver and SEC's counsel	0.4	Fates	478
90	5/24/13	Meet and confer with SEC's counsel regarding Schooler's motion to modify preliminary injunction	0.4	Fates	478

91	5/30/13	Call with SEC's counsel regarding [work on report regarding real estate evaluation]	0.1	Fates	478
92	6/5/13	Confer with Receiver and SEC's counsel regarding Schooler's motion to modify preliminary injunction/dissolve receivership over GPs	0.4	Fates	478
93	6/14/13	Review SEC correspondence	0.4	Hebrank	477
94	6/18/13	T/Cs with Atty Fates, G. Rodriguez and SEC		Hebrank	477
95	6/19/13	Meet and confer with SEC's counsel regarding [real estate valuation] report		Fates	478
96	7/2/13	Review Defendant opposition. T/C with SEC	0.8	Hebrak	525
97	7/12/13	Communications with SEC's counsel regarding motion		Fates	526
98	7/17/13	T/C's with Atty Fates, conf call with SEC	0.8	Hebrak	525
99	8/19/13	Meet and confer with SEC's counsel regarding court orders on motion to modify, real estate report and Linmar Motion.	0.4	Fates	526
100	8/19/13	Met with T. Hebrank and Atty Fates to discuss Order from the Court. Conferred with SEC re same. Began preparations for transition of partnerships out of the Receivership	3.1	Rodriguez	525
101	8/20/13	Review and revise Cotton Driggs' final fee application, discuss same with Receiver, and send same to SEC's counsel for review.	1.2	Fates	526
102	8/26/13	Send fee applications to SEC's counsel for review	0.2	Fates	526
103	8/27/13	Communications with SEC's counsel regarding position on fee applications	0.1	Fates	526
104	8/28/13	Communications with court clerk and SEC's counsel regarding scheduling and attendance at ENE and review court order regarding same.	0.5	Fates	526
105	8/29/13	Communications with court law clerk and SEC's counsel regarding Schooler's ex parte application on potential date for hearing on Schooler's motion;...communications with SEC's counsel	0.6	Fates	526
106	8/30/13	Work on information packet; discuss same with Receiver and SEC's counsel	1.4	Fates	526
107	9/6/13	Discuss Defendants' motion for partial reconsideration with SEC's counsel and work on response to same.	0.9	Fates	526
108	10/1/13	Confer with Receiver and SEC's counsel regarding Schooler's motion for stay pending appeal, order modifying preliminary injunction, information packet, and related issues	0.7	Fates	567
109	10/14/13	Confer with SEC's counsel regarding report	0.2	Fates	567

110	10/15/13	Confer with SEC's counsel regarding appeal and appellate mediation issues	0.3	Fates	567
111	10/15/13	Confer with SEC's counsel regarding forensic report	0.3	Fates	567
112	10/23/13	Call with SEC's counsel to discuss issues regarding appeal	0.4	Fates	567
113	10/25/13	Communications with SEC's counsel regarding ENE on October 28	0.2	Fates	567
114	10/30/13	Confer with SEC's counsel regarding motion for stay pending appeal, potential cross-appeal, potential stay of release of GPs and information packets, and related issues and emails regarding same (.5);...confer with SEC's appellate counsel regarding facts and issues on appeal and potential cross-appeal (1.1)...	1.6	Fates	567
115	11/1/13	Confer with SEC's counsel regarding [response to defendants' motion for stay pending appeal] and potential cross-appeal, and advise Receiver regarding same (1.6)	2.1	Fates	567
116	11/7/13	Communications with SEC's appellate counsel	0.2	Fates	567
117	11/8/13	Call with SEC's appellate counsel regarding facts and issues on appeal	0.5	Fates	567
118	11/12/13	Call with SEC's counsel regarding facts and issues on appeal and potential cross-appeal		Fates	567
119	11/13/13	Discuss appeal issues and SEC's request for certain forensic accounting data with S. Hoslett and communications with SEC's counsel regarding same	0.8	Fates	567
120	11/14/13	Communications with SEC appellate counsel and S. Hoslett regarding facts/issues on appeal	0.4	Fates	567
121	11/15/13	Communications with SEC appellate counsel and S. Hoslett regarding facts/issues on appeal	0.6	Fates	567
122	11/18/13	Work on investor county by GP investment, as requested by Counsel/SEC	6.9	Hoslett	566
123	11/19/13	Communications with SEC appellate counsel and S. Hoslett regarding facts/issues on appeal	0.4	Fates	567
124	11/19/13	Confer with SEC's counsel regarding application to address mortgage payments	0.6	Fates	567
125	11/19/13	T/C with SEC	0.6	Hebrank	566
126	11/21/13	Confer with SEC's counsel regarding potential application to address GP mortgage payments and discuss same with G. Rodriguez	0.3	Fates	567

127	11/26/13	Call with SEC's counsel regarding concerns with receivership estate, mortgage payments and GP properties; discuss same with Receiver	0.6	Fates	567
128	11/27/13	Respond to inquiry from SEC's appellate counsel regarding facts at issue in appeal	0.2	Fates	567
129	12/2/13	Respond to SEC's inquiry regarding F-86 issue	0.1	Fates	567
130	1/2/14	Communications with SEC's counsel regarding information for appeal	0.1	Fates	601
131	1/31/14	Confer with SEC's counsel regarding issues in litigation with Schooler and Western	0.2	Fates	601
132	2/3/14	Confer with SEC's counsel regarding GP term expiration issue and recommendation regarding same in interim report	0.2	Fates	601
133	2/5/14	Call from SEC's counsel regarding concerns with Partnership Administrator communications with investors; discuss same with Receiver	0.3	Fates	601
134	3/11/14	Confer with SEC's counsel regarding deposition and written discovery issues	0.3	Fates	601
135	3/21/14	Review SEC's expert disclosure	0.1	Fates	601
136	3/25/14	Confer with SEC's counsel regarding motion for reconsideration, motion for summary judgment, and dates for depositions	0.6	Fates	601
137	3/31/14	...send all fee applications to SEC's counsel for review		Fates	601
138	4/7/14	Communications with SEC's counsel regarding fee applications	0.1	Fates	819
139	4/14/14	Attention to rules/pleadings as to oral argument on April 25 and discuss same with SEC's counsel and Receiver	0.3	Fates	819
140	4/18/14	Discuss documents produced by Schooler regarding legal analysis relied on and potential third party claims with SEC's counsel	0.2	Fates	819
141	4/24/14	Discuss hearing on MSJ and factual issues regarding same with SEC's counsel and discuss same with receiver	0.7	Fates	819
142	4/25/14	Review order granting SEC's partial summary judgment, discuss same with Receiver and communications with SEC's counsel	0.8	Fates	819
143	4/28/14	Communications with Receiver and SEC's counsel regarding issues raised in summary judgment order and Schooler motion to dissolve receivership over Western	0.7	Fates	819
144	4/28/14	Conf call with SEC	0.5	Hebrank	818

145	6/18/14	Communications with SEC's counsel regarding seventh interim fee applications		Fates	819
146	7/8/14	Communications with SEC's counsel to arrange call regarding [July 18 hearing]		Fates	962
147	7/11/14	Confer with Receiver and SEC's counsel on issues relating to July 18 hearing	1.7	Fates	962
148	7/17/14	Analyze issues for July 18 hearing regarding reconsideration of August 16, 2013 order, discuss same with Receiver and SEC's counsel	3.4	Fates	962
149	7/18/14	Analyze issues for hearing on sua sponte reconsideration of GPs in receivership and discuss same with Receiver and SEC's counsel (2.4);...review and analyze Court's tentative ruling and discuss same with Receiver and SEC's counsel (.9)	3.3	Fates	962
150	7/18/14	Met with Atty Fates, SEC, investors		Hebrank	961
151	7/29/14	Review expert report provided by SEC's counsel	0.2	Fates	962
152	7/30/14	Review correspondence from SEC's counsel regarding Schooler's objections to SEC's subpoenas	0.1	Fates	962
153	8/8/14	Discuss response to G. Post's motion to intervene with SEC's counsel and review SEC's response	0.3	Fates	962
154	9/8/14	Review Schooler's rebuttal testimony regarding value of properties appraised by SEC's expert and discuss same with Receiver	0.3	Fates	962
155	9/11/14	Confer with SEC's counsel regarding Ninth Interim Report	0.1	Fates	962
156	9/15/14	Confer with SEC's counsel regarding [receivership website and GP balloting and exhibits]		Fates	962
157	9/23/14	Confer with SEC's counsel regarding deposition issues and GP brief issues	0.3	Fates	962
158	9/25/14	Confer with SEC's counsel regarding GP briefs and issues for October 10 hearing	0.6	Fates	962
159	9/29/14	Discuss issues regarding appeal of order denying Schooler's motion to remove Western from receivership with SEC's counsel	0.2	Fates	962
160	10/2/14	Discuss issues regarding Jacobson and Schuler depositions and October 10 hearing with SEC's counsel	0.3	Fates	1092
161	10/9/14	Discuss partnership administrator depositions and issues for October 10 hearing with SEC's counsel	0.3	Fates	1092
162	10/9/14	Discuss server access issues with Receiver and prepare argument regarding same; discuss issues with SEC's counsel.	0.7	Fates	1092

163	10/13/14	Communications with SEC's counsel regarding documents received at October 10 hearing and sample operational bills	0.5	Fates	1092
164	10/14/14	Analyze issues for October 15 hearing, prepare for same, and communications with SEC's counsel regarding same (2.9); review Schooler's reply brief and discuss same with Receiver and SEC's counsel (1.1)	4	Fates	1092
165	10/15/14	Confer with SEC counsel on issues for 10/15 hearing and related issues	0.9	Fates	1092
166	10/15/14	Met with Atty Fates and SEC in preparation for hearing. Attend hearing. Discuss results of hearing.		Hebrank	1091
167	10/20/14	Send fee applications to SEC's counsel		Fates	1092
168	10/21/14	Communications with SEC's counsel and Receiver regarding issues for conference call	0.4	Fates	1092
169	10/22/14	Confer with Receiver and SEC's counsel on legal and factual issues related to report and recommendation due October 31 and research regarding same	2.2	Fates	1092
170	10/22/14	Conf call with SEC		Hebrank	1091
171	10/28/14	Discuss stipulation/joint motion regarding extension of time to file report and recommendation with SEC's counsel	0.1	Fates	1092
172	10/28/14	Discuss ex parte application and recommendation with SEC's counsel	0.2	Fates	1092
173	10/31/14	Discuss Hougen's deposition and related discovery issues with SEC's counsel	0.2	Fates	1092
174	11/6/14	Confer with SEC's counsel regarding discovery issues	0.2	Fates	1092
175	11/19/14	Confer with SEC's counsel regarding report and recommendations	0.8	Fates	1092
176	11/19/14	Conf call with SEC		Hebrank	1091
177	11/20/14	Confer with SEC's counsel regarding report and recommendations	0.5	Fates	1092
178	11/21/14	Confer with SEC's counsel regarding report and recommendations	0.7	Fates	1092
179	12/2/14	Confer with SEC's counsel regarding Defendants' request to access records in offsite storage and discuss same with Receiver	0.5	Fates	1092
180	12/4/14	Confer with SEC's counsel regarding potential motion for asset freeze and discuss same with Receiver	0.4	Fates	1092

181	12/22/14	Communications with G. Rodriguez and SEC's counsel regarding order of Iron Mountain documents, shipping of same, etc.	0.4	Fates	1092
182	12/23/14	Review briefing as to the removal of the Receiver, assess claims, confer with counsel as to SEC response	0.6	Zaro	1092
183	1/7/15	Communications with G. Rodriguez and SEC's counsel regarding transportation of Iron Mountain records from Defendants' counsel to SEC's counsel and return of same to Iron Mountain	0.3	Fates	1097
184	1/7/15	Call with chambers regarding letters of intent to purchase GP properties		Fates	1097
185	1/9/15	Send fee applications to SEC's counsel	0.5	Fates	1097
186	1/15/15	Various communications with SEC's counsel and G Rodriguez regarding transmission of Western boxes from SEC's offices in LA to Iron Mountain storage in San Diego	0.8	Fates	1097
187	1/16/15	Communications with G. Rodriguez and SEC's counsel regarding Iron Mountain issues and courier transmission issues	0.3	Fates	1097
188	1/20/15	Coordinated pickup of files from SEC to return them to Iron Mountain facility	0.5	Rodriguez	1096
189	1/20/15	Discuss investor request to transfer GP units with other investor with SEC's counsel and advise Receiver regarding interim response to investor	0.4	Fates	1097
190	1/20/15	Discuss position on fee applications with SEC's counsel	0.1	Fates	1097
191	1/21/15	Communications with SEC's counsel regarding delivery of boxes to Iron Mountain	0.1	Fates	1097
192	1/28/15	Discuss investor request to transfer GP units with SEC's counsel	0.3	Fates	1097
193	1/29/15	Discuss issues regarding investor request to transfer GP units to other investor with SEC's counsel and Receiver	0.7	Fates	1097
194	2/2/15	Review communication from Schooler's counsel regarding ex parte motion to file supplemental reply; discuss same with Receiver and SEC's counsel...		Fates	1097
195	2/9/15	Call with SEC's counsel regarding logistics for E. Houggen's deposition	0.2	Fates	1097
196	2/26/15	Confer with SEC's counsel regarding batches of Iron Mountain documents	0.2	Fates	1097
197	3/11/15	Discuss [ex parte notice] with SEC's counsel	0.2	Fates	1097

198	3/26/15	Review and discuss SEC case summary		Hebrank	1096
199	4/13/15	Return call from SEC's counsel	0.1	Fates	1127
200	4/28/15	Communications with SEC's counsel regarding transmittal of Western records to Iron Mountain	0.2	Fates	1127
201	4/29/15	Communications with SEC counsel and G. Rodriguez regarding scheduling delivery of Western records to Iron Mountain	0.4	Fates	1127
202	5/8/15	Confer with SEC's counsel regarding MSJ/discovery scheduling issues.	0.1	Fates	1127
203	5/11/15	Discuss investor inquiry regarding checks with SEC's counsel and Receiver	0.3	Fates	1127
204	5/20/15	Review the general order on the SEC's motion for summary judgment/disgorgement and follow-up with counsel at SEC re same, including collection of disgorgement amounts	0.6	Fates	1127
205	5/20/15	Call with SEC's counsel to discuss potential judgment enforcement issues regarding Schooler/Linmar III	0.4	Fates	1127
206	6/17/15	...contact court chambers regarding status of recommendations on LOIs regarding same.		Fates	1127
207	6/17/15	Discuss tenth interim fee applications with SEC's counsel	0.2	Fates	1127
208	7/8/15	Communications with Receiver and SEC's counsel regarding fee applications	0.2	Fates	1154
209	7/21/15	Discuss status regarding Linmar III receivership and potential sale of property with SEC's counsel	0.2	Fates	1154
210	8/6/15	Discuss investor correspondence and potential engagement of counsel by investors with SEC's counsel	0.2	Fates	1154
211	9/2/15	Send fee applications to SEC's counsel for review	0.2	Fates	1154
212	9/3/15	...call with SEC's counsel regarding [recommendation on Stead LOI ex parte application]	0.1	Fates	1154
213	9/3/15	Confer with SEC's counsel regarding fee applications	0.1	Fates	1154
214	9/30/15	Communications with SEC's counsel regarding issuance of GP units.		Fates	1154
215	10/7/15	Communications with SEC's counsel and Receiver regarding GP shortfall and capital call issues and review and revise letter to Santa Fe property investors.	0.6	Fates	1328

216	10/22/15	Call with SEC's counsel to discuss potential investor confusion regarding Dayton IV property and vote regarding underwater property,...		Fates	1328
217	11/9/15	Discuss 13th interim report with SEC's counsel	0.3	Fates	1328
218	11/9/15	Discuss claims and distributions issues with SEC's counsel	0.3	Fates	1328
219	11/18/15	...discuss letter filed by T. Boschee with SEC's counsel (.2)		Fates	1328
220	12/3/15	Work on Receiver's 13th interim fee application, send same to SEC counsel for review	0.4	Fates	1328
221	12/4/15	Communications with SEC counsel regarding 13th fee applications	0.2	Fates	1328
222	1/5/16	Discuss calls from G. Aguirre and P. Prindle with Receiver and SEC counsel.	0.8	Fates	1330
223	1/7/16	Discuss potential investor litigation		Hebrank	1329
224	1/11/16	Advise G. Rodriguez regarding response to inquiries from investor D. Gilman	0.2	Fates	1330
225	1/13/16	Met with SEC re: case	1.5	Hebrank	1329
226	1/13/16	Travel to/from LA	6	Hebrank	1329
227	1/13/16	Meet and confer with SEC's counsel regarding terms of proposed distribution, claims process, and related issues (1.1)...communications with SEC's counsel and Receiver to arrange follow up conference call (.2); review lengthy correspondence from investors D Gilman, D. KArp, and S. Gessner (.2)	1.5	Fates	1330
228	1/14/16	Prepare for and attend SEC conf call...		Hebrank	1329
229	1/14/16	Reviewed correspondence from D. Gilman and others regarding planned lawsuit against receiver (0.1)		Rodriguez	1329
230	1/14/16	Meet and confer calls with SEC's counsel and Receiver regarding distributions, claims process, and related issues (.9);	0.9	Fates	1330
231	1/15/16	Communications with Receiver and SEC's counsel concerning distribution issues	0.7	Fates	1330
232	1/19/16	Multiple investor correspondence re: upcoming litigation		Hebrank	1329
233	1/22/16	Call with counsel to address the distribution issues, meet/confer with parties	0.3	Zaro	1330
234	1/26/16	Conference with counsel as to Receiver's distribution plan, advice as to evidence to support potential opposition	0.3	Zaro	1330

235	1/26/16	Communications with Schooler's counsel regarding scheduling meet and confer on motion	0.1	Fates	1330
236	1/27/16	Communications with Schooler's counsel regarding meet and confer on motion	0.1	Fates	1330
237	2/1/16	Communications with SEC's counsel to arrange call to discuss motion	0.2	Fates	1330
238	2/2/16	Meet and confer call with SEC's counsel	0.2	Fates	1330
239	2/3/16	Conf call with SEC Enforcement on Schooler judgment collection. Provide requested data.		Hebrank	1329
240	2/3/16	Calls with Receiver and SEC's counsel regarding issues related to enforcement of judgment against Schooler.	0.7	Fates	1330
241	2/4/16	Discuss correspondence and response to Atty Aguirre		Hebrank	1329
242	2/18/16	Discuss response to communications from counsel for investor group with Receiver (.3); meet and confer with SEC's counsel regarding same (.2); prepare response to counsel for investor group (.2)	0.7	Fates	1330
243	2/29/16	Call with SEC's counsel regarding response to G. Aguirre request	0.1	Fates	1330
244	3/16/16	Confer with SEC's counsel regarding various Aguirre filings and position and potential response to same and advise Receiver regarding same (.4); confer with SEC's counsel regarding T. Dillon request for meeting with SEC and Receiver and advise Receiver regarding same (.3)	0.7	Fates	1330
245	3/20/16	...communications with Receiver and SEC's counsel regarding T. Dillon's request for meeting (.4)	Fates	Fates	1330
246	3/22/16	Conf call with SEC re: requested litigation meetings.		Hebrank	1329
247	3/22/16	Meet and confer with SEC's counsel regarding Dillon's request for meeting, Dillon's request to delay hearing, Aguirre's document requests, and related issues	0.8	Fates	1330