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6
7 Local Counsel in Nevada to Receiver
THOMAS C. HEBRANK

8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10
11 SECURITIES AND EXCHANGE
COMMISSION,

12 Plaintiff,

13 v.

14 LOUIS V. SCHOOLER and FIRST
FINANCIAL PLANNING
15 CORPORATION d/b/a WESTERN
FINANCIAL PLANNING
16 CORPORATION,

17 Defendants.

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

**SECOND INTERIM FEE
APPLICATION OF HOLLEY
DRIGGS WALCH FINE WRAY
PUZEY & THOMPSON, LOCAL
COUNSEL IN NEVADA TO
RECEIVER**

Date: April 5, 2019
Time: 1:30 p.m.
Ctrm.: 2D
Judge: Hon. Gonzalo P. Curiel

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1 Holley, Driggs, Walch, Fine, Wray, Puzey & Thompson, formerly known as
2 Cotton, Driggs, Walch, Holley, Woloson & Thompson ("Holley Driggs"), local
3 counsel in Nevada to Thomas C. Hebrank ("Receiver"), Court-appointed receiver
4 for First Financial Planning Corporation d/b/a Western Financial Planning
5 Corporation ("Western"), and its subsidiaries, hereby submits this second interim
6 application for payment of professional fees and reimbursement of costs for the time
7 period August 20, 2013, through August 6, 2018 ("Application Period"). Holley
8 Driggs incurred \$31,100.00 in fees and \$202.40 in costs during the application
9 period and seeks interim approval and payment of its fees incurred and 100% of
10 costs incurred.

11 **I. FEE APPLICATION SUMMARY**

12 During the Application Period, Holley Driggs provided a total of 101.8 hours
13 of service for a total of \$31,100.00 in fees. Holley Driggs requests payment on an
14 interim basis of this amount. The firm has provided its services as set forth task-by-
15 task in Exhibit A.

16 **II. TASKS PERFORMED**

17 During the Application Period, Holley Driggs worked diligently to assist the
18 Receiver with legal issues affecting the receivership. The following is a discussion
19 of Holley Driggs' work, broken down by the matters listed on Exhibit A.

20 A. Minden Property -- Carson Valley Partners, et al. (Matter Nos.
21 00016-00 and 00016-06)

22 Work in this matter relates to assisting the Receiver with obtaining a water
23 permit for a piece of real property located in Douglas County, Nevada.

24 During the Application Period, Holley Driggs assisted the Receiver in
25 preparing an Application for Extension of Time for Permit 65378.

26 Holley Driggs also assisted the Receiver in addressing a water dedication
27 agreement, water right issues, a Douglas County interlocal agreement with the Town
28 of Minden, Nevada, change application issues, and a banking agreement.

1 Holley Driggs also researched and advised the Receiver on issues relating to
2 proposed wells and diversion rates. Holley Driggs also researched and prepared
3 deeds for dedication from partnerships to Douglas County, Nevada. The reasonable
4 and necessary fees in this matter total \$12,384.00.

5 B. Gold Ridge Partners (Matter No. 00016-108)

6 This matter includes time spent researching and preparing a Stipulation and
7 Order to Dismiss Prejudice the case known as Sierra Pacific Power Company v.
8 Gold Ridge Partners, et al., Case No. CV20172. The reasonable and necessary fees
9 for work in this matter total \$854.00.

10 C. Thomas Hebrank as Receiver for Washoe 3 Property (Matter No.
11 11773-01)

12 Holley Driggs' work in this matter focused on assisting the Receiver with
13 successfully obtaining waivers of penalties and interest related to Special
14 Assessment Bond payments owing on two parcels of real property owned by two of
15 the Receivership's General Partnerships. This work including extensive research,
16 correspondence and meetings with the District Attorney's office and various county
17 officials. The reasonable and necessary fees for this matter total \$11,022.00.

18 D. Thomas Hebrank as Receiver for Reno Vista Partners (Matter No.
19 11773-02)

20 Holley Driggs' work in this matter focused on assisting the Receiver with
21 terminating a stale Deed of Trust and clearing it from the title to a parcel of real
22 property located in Washoe County, Nevada so that same could be sold and the
23 funds realized therefrom could be added to the amounts available for distribution to
24 the investors. The reasonable and necessary fees for this matter total \$6,840.00.

25 E. Summary of Costs Requested

26 Holley Driggs requests the Court approve reimbursement of \$202.40 for out-
27 of-pocket costs incurred in executing the foregoing tasks, as itemized in Exhibit B.

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1 **III. FEES AND COSTS INCURRED AND PAID TO DATE**

2 From inception of the receivership on September 6, 2012, through April 19,
3 2013, the Holley Driggs (formerly Cotton Driggs Walch, Holley, Woloson &
4 Thompson) incurred \$11,784.50 in fees and costs of \$573.80, of which amount
5 \$12,358.30 has been approved by the Court and paid.

6 **IV. APPROVAL OF REQUESTED FEES AND COSTS**

7 In its Order Granting in Part First Interim Fee Applications ("First Fee
8 Order"), the Court analyzed the case law regarding approval of interim fee
9 applications in regulatory receiverships and determined the following factors should
10 be considered: (1) the complexity of the receiver's tasks; (2) the fair value of the
11 time, labor, and skill measured by conservative business standards; (3) the quality of
12 work performed, including the results obtained and the benefit to the receivership
13 estate; (4) the burden the receivership estate may safely be able to bear; and (5) the
14 Commission's opposition or acquiescence. Dkt. No. 169, p. 7.

15 A. Complexity of Tasks

16 Here, the tasks performed by Holley Driggs are significantly complex and the
17 number of hours billed to complete them are reasonable. These tasks include (a)
18 working with County and State water officials on a process to obtain a water permit;
19 (b) advised the Receiver on issues related to proposed wells and diversion rates; (c)
20 legal research; (d) property title research; (e) drafting documents to obtain dismissal
21 of a case; (f) negotiate and work with the District Attorney's office and various
22 county officials to determine the process to successfully obtain waivers of penalties
23 and interest related to a two parcels of real property; (g) evaluating options to
24 determine most expedient and efficient process to obtain a court order removing the
25 state deed of trust.

26 B. Fair Value of Time, Labor & Skill

27 The Court previously determined in connection with the firm's first interim
28 fee application that the hourly rates of Holley Driggs, which are consistent or below

1 those charged by other firms in the Las Vegas and Reno markets, represent the fair
2 value of their time, labor, and skill.

3 C. Quality of Work Performed

4 Holley Driggs has diligently and competently assisted the Receiver in the
5 specific aspects of the receivership described above. These services have allowed
6 the Receiver to preserve and protect the value of the Receivership Entities' assets for
7 the benefit of investors.

8 D. Receivership Estate's Ability to Bear Burden of Fees

9 Pursuant to the Court's May 25, 2016 Order (Dkt. No. 1304), the assets of the
10 Receivership Entities (Western and the GPs) have been pooled, creating a common
11 pool of receivership estate cash from which mortgages, property taxes, and other
12 operating expenses have been and will continue to be paid. The cash balance has
13 grown and will continue to grow as properties are sold through the Court-approved
14 Modified Orderly Sale Process (Dkt. Nos. 1309, 1359). As a result of sales closed
15 to date, the receivership estate held approximately \$4 million in cash as of
16 September 30, 2018. Therefore, the receivership estate has the ability to pay the
17 fees and costs requested herein.

18 E. Commission's Opposition or Acquiescence

19 Prior to filing, the Receiver, Allen Matkins and Holley Driggs provided their
20 fee applications to counsel for the Commission in substantially final form. Counsel
21 for the Commission has advised that the Commission has no opposition to the fees
22 and costs requested.

23 Accordingly, the five factors identified by the Court for considering interim
24 fee applications all support interim approval and payment of the requested fees and
25 costs.

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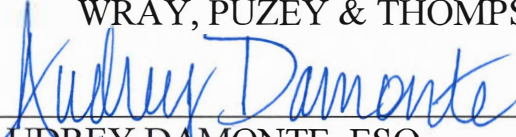
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V. CONCLUSION

WHEREFORE, the Receiver and Holley Driggs respectfully request entry of an order:

1. Approving payment of fees to Holley Driggs on an interim basis of \$31,100.00;
2. Approving reimbursement of expenses to Holley Driggs on an interim basis of \$202.40;
3. Authorizing and directing the Receiver to pay these amounts to Holley Driggs from assets of the Receivership Entities; and
4. Granting such further and other relief as the Court deems just and proper.

Dated: This 17th day of January, 2019.

HOLLEY, DRIGGS, WALCH, FINE,
WRAY, PUZEY & THOMPSON


AUDREY DAMONTE, ESQ.
Local Counsel in Nevada to the Receiver

EXHIBIT INDEX

Exhibit A	Detailed Time Reports	8
Exhibit B	Out-of-Pocket Cost Report	27

EXHIBIT A

EXHIBIT A

HOLLEY DRIGGS WALCH FINE WRAY PUZEY & THOMPSON

Transactions Copy of Listing (Wide) Report

Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='00016-06'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
<i>Component: T</i>						
<i>Component Type: Fees</i>						
2/14/2014	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review file; telephone conference with Douglas County regarding change application	T	0.3000	250.0000	75.0000
2/19/2014	TDD	00016-06 / First Financial Planning Corp./ Carson Valley Partners, et al Review file and banking agreement; email correspondence to Mr. Ruschmeyer regarding the change application	T	0.4000	250.0000	100.0000
3/4/2014	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review water permit files; review correspondence from Douglas County Water District regarding change application information; email correspondence to receiver; telephone conference with Attorney Fates regarding	T	0.7000	255.0000	178.5000
3/13/2014	TDD	00016-06 / First Financial Planning Corp Carson Valley Partners, et al Email correspondence to water engineer consultant regarding market value; review files	T	0.2000	255.0000	51.0000
3/18/2014	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review file; draft status report for Reciever	T	0.3000	255.0000	76.5000
3/19/2014	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review files; draft email to reciever regarding water rights	T	1.3000	255.0000	331.5000
3/20/2014	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Telephone conferences with Truckee Meadows Water Authority and water broker regarding	T	0.8000	255.0000	204.0000

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Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='00016-06'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
		water issues				
3/21/2014	TDD	00016-06 / First Financial Planning Corp. Telephone conference with Mr. Fates and Mr. Hebrank regarding water rights issues	Carson Valley Partners, et al T	0.7000	255.0000	178.5000
4/8/2014	TDD	00016-06 / First Financial Planning Corp. Review file; prepare Application for Extension of Time for Permit 65378	Carson Valley Partners, et al T	1.3000	255.0000	331.5000
2/26/2015	TDD	00016-06 / First Financial Planning Corp. Email correspondence to Mr. Fates and Mr. Hebrank regarding extension application	Carson Valley Partners, et al T	0.2000	265.0000	53.0000
3/4/2015	TDD	00016-06 / First Financial Planning Corp. Review file; prepare Application for Extension of Time for Permit	Carson Valley Partners, et al T	0.8000	265.0000	212.0000
10/19/2015	TDD	00016-06 / First Financial Planning Corp. Review file; email correspondence to Mr. Ruschmeyer regarding Douglas County interlocal agreement with Town of Minden regarding wholesal	Carson Valley Partners, et al T	0.3000	265.0000	79.5000
1/8/2016	TDD	00016-06 / First Financial Planning Corp. Review file and status of Douglas County Water District wholesale water agreement; review and analysis of water permit extension and change application issues with Mr. Walch	Carson Valley Partners, et al T	0.6000	265.0000	159.0000
1/20/2016	TDD	00016-06 / First Financial Planning Corp. Detailed message and email to Douglas County Water District regarding water dedication	Carson Valley Partners, et al T	0.7000	265.0000	185.5000

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Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='00016-06'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
		agreement; email to Receiver's counsel Mr. Fates regarding the same				
1/22/2016	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Telephone conference with Douglas County Public Works Director regarding banking agreement	T	0.6000	265.0000	159.0000
1/22/2016	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review file documents and extension issues; review and analysis of water extension issues with Mr. Walch	T	0.6000	265.0000	159.0000
1/25/2016	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review email from Douglas County Public Works Department regarding change application information	T	0.6000	265.0000	159.0000
1/26/2016	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review and reply to email from Douglas County Water District regarding proposed point of diversion and place of use for change application; review dedication agreement regarding the same	T	1.1000	265.0000	291.5000
2/8/2016	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review file and preparation for telephone conference; telephone conference with Mr. Fates and Mr. Hebrank regarding water issues	T	0.9000	275.0000	247.5000
2/17/2016	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review file; prepare change application from Permit 65378	T	1.7000	275.0000	467.5000

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Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='00016-06'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
2/18/2016	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Email correspondence to Douglas County Utilities regarding draft change application; prepare extension application for Permit 65378	T	1.3000	275.0000	357.5000
2/19/2016	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review status of water dedication issues with Mr. Walch	T	0.3000	275.0000	82.5000
2/23/2016	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review file; email to Douglas County regarding status of draft change application; review and reply to comments from Douglas County; revise and finalize change application	T	1.4000	275.0000	385.0000
2/24/2016	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review further comments from Douglas County; revise and finalize change application	T	0.7000	275.0000	192.5000
3/15/2016	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review and respond to request from Receiver's counsel regarding Douglas County water banking agreement and related documents	T	0.8000	275.0000	220.0000
3/18/2016	GJW	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Conference with attorney Driggs regarding status and strategy	T	0.2000	425.0000	85.0000
12/5/2016	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Telephone conference with Mr. Fates regarding status update of water rights change application	T	0.3000	275.0000	82.5000
12/7/2016	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review file and water permit file; email correspondence to Receiver's counsel regarding water	T	0.7000	175.0000	122.5000

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Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='00016-06'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
		rights sale description				
3/14/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review water permit file regarding application approval and extension issues	T	0.2000	285.0000	57.0000
3/15/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Telephone message left with Mr. Randal of DWR regarding status of water Application; email to Mr. Randal regarding the same	T	0.3000	285.0000	85.5000
3/21/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review telephone message from Mr. Randall of DWR regarding Application 85965; review permit files and statutes regarding notice requirements	T	0.9000	285.0000	256.5000
3/22/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Telephone conference with Mr. Ruschmeyer of Douglas County regarding water application issues	T	0.4000	285.0000	114.0000
3/23/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review notice from State Engineer regarding Permit 65378; telephone conference with Mr. Fates regarding water permit issues	T	0.4000	285.0000	114.0000
3/24/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review and analysis of change application and diversion rate issues with Mr. Walch	T	0.2000	285.0000	57.0000
3/27/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Email to Mr. Ruschmeyer of Douglas County regarding well issues; email Mr. Randall of DWR regarding the same; draft letter to withdraw diversion rate	T	1.6000	285.0000	456.0000

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Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='00016-06'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
3/28/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review Douglas County water permits in proposed well; email correspondence to Mr. Ruschmeyer regarding the same	T	1.2000	285.0000	342.0000
4/6/2017	TDD	00016-06 / First Financial Planning Corp., Carson Valley Partners, et al Email Douglas County regarding change application issues; review file	T	0.6000	285.0000	171.0000
4/7/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review and reply to email from Duoglas County regarding diversion rate; finalize letter withdrawing diversion rate; prepare extension application	T	0.9000	175.0000	157.5000
4/10/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Prepare water permit extension of time	T	0.9000	285.0000	256.5000
4/24/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Reply to email correspondence to Mr. Fates regarding status of the water rights	T	0.6000	175.0000	105.0000
6/15/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review message from Mr. Randall of DWR regarding Application 85965; telephone conference and email with Mr. Randall regarding the same	T	0.4000	285.0000	114.0000
7/29/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review banking agreement regarding dedication issues	T	0.4000	285.0000	114.0000

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Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='00016-06'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
7/31/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Prepare draft deeds for dedication to Douglas County	T	0.3000	285.0000	85.5000
8/7/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review file; prepare draft deeds from partnerships to Douglas County	T	1.7000	285.0000	484.5000
8/17/2017	TDD	00016-06 / First Financial Planning Corp.. Carson Valley Partners, et al Review file; review letters from State Engineer issuing new water permit	T	0.6000	285.0000	171.0000
8/25/2017	TDD	00016-06 / First Financial Planning Corp.. Carson Valley Partners, et al Review file; prepare deeds	T	1.2000	285.0000	342.0000
9/18/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review file; review and revise deeds; review recoder's records; prepare declaration of value	T	2.8000	285.0000	798.0000
9/19/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Prepare reports of conveyance and abstracts of title; research chain of title; research entity status, review and revise deed	T	2.3000	285.0000	655.5000
9/26/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Email correspondence to Mr. Ruschmeyer, Director of Douglas County Public Works, regarding draft deed and reports of conveyance; review file	T	1.1000	285.0000	313.5000
9/27/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review and revise water rights deed, finalize email to Douglas County Public Works Director regarding water rights dedication	T	0.6000	285.0000	171.0000

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Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='00016-06'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
10/2/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review and reply to email from Douglas County regarding deed and report of conveyance; email to Mr. Fates regarding the same	T	0.6000	285.0000	171.0000
11/27/2017	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review file; prepare proof of completion for Permit 85965	T	1.4000	285.0000	399.0000
2/23/2018	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review file regarding Douglas County dedication	T	0.6000	295.0000	177.0000
5/8/2018	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review file; telephone conference with Mr. Broersma of Douglas County Water District regarding finalizing water dedication; email to Mr. Broersma and Mr. Roman regarding the same	T	1.7000	295.0000	501.5000
5/9/2018	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Finalize email to Douglas County regarding water rights dedication	T	0.2000	295.0000	59.0000
7/25/2018	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Review and reply to email from Douglas County regarding Proof of Completion for Permit 85965	T	0.7000	295.0000	206.5000
7/26/2018	TDD	00016-06 / First Financial Planning Corp. Carson Valley Partners, et al Email to Mr. Boersma of Douglas County Utility Department regarding water permit proof of	T	0.3000	295.0000	88.5000

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 Transactions Copy of Listing (Wide) Report

Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='00016-06'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
		completion				
8/6/2018	TDD	00016-06 / First Financial Planning Corp. Review and revise Proof of Completion	Carson Valley Partners, et al T	0.2000	295.0000	59.0000
			Component Type: Fees	47.0000		12,840.5000
			Component: T	47.0000		12,840.5000
			Grand Total	47.0000		12,840.5000

HOLLEY DRIGGS WALCH FINE WRAY PUZEY & THOMPSON

Transactions Copy of Listing (Wide) Report

Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='00016-108'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
<i>Component: T</i>						
<i>Component Type: Fees</i>						
11/5/2013	DMW	00016-108 / First Financial Planning Corp. Gold Ridge Partners Receive and review Order Approving Fees and email correspondence with Mr. Fates regarding the same and closure of the case	T	0.3000	260.0000	78.0000
11/6/2013	JAJ	00016-108 / First Financial Planning Corp. Gold Ridge Partners Review and analysis of court rules; telephone conference with Clerk of First Judicial District Court of Storey County regarding same; prepare e-mail analysis to Attorney Wittig regarding stipulation for dismissal	T	1.0000	170.0000	170.0000
11/6/2013	DMW	00016-108 / First Financial Planning Corp. Gold Ridge Partners Review Stipulation and Order to Dismiss with Prejudice and other pleadings (0.2), and telephone call with Mr. Chapman regarding status of state court action and dismissal (0.2)	T	0.4000	260.0000	104.0000
11/7/2013	DMW	00016-108 / First Financial Planning Corp. Gold Ridge Partners Email correspondence with Mr. Fates (0.2); telephone call and follow-up email to Mr. Chapman (0.3)	T	0.5000	260.0000	130.0000
11/13/2013	DMW	00016-108 / First Financial Planning Corp. Gold Ridge Partners Telephone call with Mr. Chapman regarding Stipulation	T	0.2000	260.0000	52.0000
11/14/2013	DMW	00016-108 / First Financial Planning Corp. Gold Ridge Partners Email correspondence with Mr. Fates regarding Stipulation to Dismiss	T	0.2000	260.0000	52.0000

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Transactions Copy of Listing (Wide) Report

Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='00016-108'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
11/15/2013	DMW	00016-108 / First Financial Planning Corp. Gold Ridge Partners Telephone call from Mr. Chapman and follow-up email with Mr. Fates regarding Stipulation (0.2); update Stipulation for Prejudice with Dismissal and send to Mr. Chapman for review and signature (0.4)	T	0.5000	260.0000	130.0000
11/19/2013	DMW	00016-108 / First Financial Planning Corp. Gold Ridge Partners Receive signed stipulation from Mr. Chapman	T	0.1000	260.0000	26.0000
11/20/2013	DMW	00016-108 / First Financial Planning Corp. Gold Ridge Partners Email correspondence with Mr. Fates regarding Stipulation	T	0.2000	260.0000	52.0000
11/21/2013	JAJ	00016-108 / First Financial Planning Corp. Gold Ridge Partners Research regarding rules of court regarding Stipulation and Order to Dismiss With Prejudice	T	0.2000	170.0000	34.0000
11/22/2013	DMW	00016-108 / First Financial Planning Corp. Gold Ridge Partners Confirm Storey County receipt of filing of the Stipulation to Dismiss	T	0.1000	260.0000	26.0000
			Component Type: Fees	3.7000		854.0000
			Component: T	3.7000		854.0000
			GrandTotal	3.7000		854.0000

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Transactions Copy of Listing (Wide) Report

Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='11773-01'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
<i>Component: T</i>						
<i>Component Type: Fees</i>						
6/28/2016	JDD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Telephone conference with client re: improvement district obligations	T	1.1000	420.0000	462.0000
6/29/2016	JDD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Conference with Mr. Puzey re: improvement district penalties	T	0.3000	420.0000	126.0000
6/30/2016	JWP	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr . Representation Regarding Special Assessment Discussions regarding possible waiver of penalties since property was under Court protection and funds were not allocated for payment; Review of correspondence regarding same and research regarding same; Telephone conference with Districts Attorney's office regarding meeting to discuss resolution	T	2.9000	360.0000	1,044.0000
7/5/2016	JWP	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Review of correspondence from counsel to civil division of DA regarding status of settlement discussions	T	0.4000	360.0000	144.0000
7/5/2016	APD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr . Representation Regarding Review documentation and telephone conference regarding Spanish Springs development property in receivership under the federal court order in San Diego; prepare email to Paul Lipparelli, Assistant Deputy Attorney -Civil Division regarding seeking waiver as special assessments and penalties	T	0.4000	360.0000	144.0000

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Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='11773-01'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
7/6/2016	APD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Research regarding real property assessment data, real property taxation, location of real property, and legal research regarding applicable statutes and receivership	T	2.4000	360.0000	864.0000
7/12/2016	JWP	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr . Representation Regarding Correspondence with clietn regarding a possible hearing with D.A.	T	0.4000	360.0000	144.0000
7/13/2016	APD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr . Representation Regarding Preparation for and initial telephone conference with Paul Lipparelli, Civil Deputy District Attorney providing him with preliminary information about the special assessment waivers sought, the application statutes and other pertinent information explaining the request	T	0.7000	360.0000	252.0000
7/18/2016	JDD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Correspondence re: status of discussions with Washoe district attorney	T	0.4000	420.0000	168.0000
7/18/2016	JWP	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr . Representation Regarding Telephone conference with Paul Lipparelli regarding meeting to discuss possible waiver of outstanding fees and penalties owed to Washoe County; Correspondence to counsel re: same	T	1.8000	360.0000	648.0000
7/20/2016	JDD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr . Representation Regarding Prepare for telephone conference with Washoe County district attorney; Telephone conference with Washoe County district attorney; correspondence to client	T	1.0000	420.0000	420.0000
7/20/2016	APD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Review Assessor's parcel tax information and applicable statutes; prepare for and participate in telephone conference with counsel Driggs, counsel Puzey, and Washoe County Deputy District Attorney, Civil Division, Paul Lipparelli to discuss potential for waiver of special assessment penalties and late fees and related issues under NRS 271.445 for Spanish	T	1.8000	360.0000	648.0000

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Transactions Copy of Listing (Wide) Report

Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='11773-01'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
Springs real property currently in receivership under federal court in San Diego						
7/20/2016	JWP	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr . Representation Regarding Telephone conference with Paul Lipparelli re: possible waiver of fees; Meeting with counsel regarding results of same	T	2.3000	360.0000	828.0000
7/25/2016	JDD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr . Representation Regarding Telephone conference with Mr. Driggs re: status	T	0.1000	420.0000	42.0000
7/26/2016	JWP	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr . Representation Regarding Review of correspondence from Washoe County District Attorney re: ordinance for assessment with the interest accumulation and penalties	T	0.6000	360.0000	216.0000
8/8/2016	JWP	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr . Representation Regarding Discussions with counsel and D/A re: status with Treasurer	T	0.8000	360.0000	288.0000
8/9/2016	JWP	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr . Representation Regarding Review of correspondence from District Attorney with applicable statute; Research regarding applicability of same.	T	0.7000	360.0000	252.0000
8/25/2016	JDD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr . Representation Regarding Correspondence with client re: status	T	0.2000	420.0000	84.0000
8/25/2016	APD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr . Representation Regarding Follow-up telephone call to Paul Lipparelli, Assistant District Attorney, Civil Division leaving a detailed message	T	0.4000	360.0000	144.0000

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Transactions Copy of Listing (Wide) Report

Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='11773-01'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
8/30/2016	JWP	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Review correspondence from counsel and client regarding scheduling meeting with DA's office to discuss removal of penalties	T	0.4000	360.0000	144.0000
9/8/2016	JWP	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Review of correspondence from counsel regarding upcoming meeting and status	T	0.2000	360.0000	72.0000
9/13/2016	APD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Prepare for and attend meeting with Michael Large, Washoe County Deputy District Attorney, Civil Division (1.8)	T	1.8000	360.0000	648.0000
9/13/2016	JWP	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Preparation for meeting with counsel for Washoe County; Meeting with Michael Large re: waiver of interest and penalties and our position regarding same	T	1.1000	360.0000	396.0000
10/19/2016	JWP	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Discussions with counsel regarding status of response from Washoe County; Review of correspondence from client regarding same	T	0.4000	360.0000	144.0000
10/25/2016	APD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Seek copy of bankruptcy orders requested by Deputy District Attorney Michael Large	T	0.3000	360.0000	108.0000
10/26/2016	APD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Telephone conference with Ted Fates obtaining additional information to provide same to Deputy DA Michael Large	T	0.4000	360.0000	144.0000

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Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='11773-01'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
11/28/2016	APD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Follow-up with Michael Large regarding his conversation with the Washoe County Treasurer	T	0.3000	360.0000	108.0000
12/5/2016	APD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Follow-up email to Michael Large, Deputy District Attorney inquiring into status and timeline regarding request to Treasurer; telephone conference with Michael Large regarding same and that he would be speaking with the Assistant Treasurer later this day and would get back to me, that Treasurer's initial reaction was to decline to waive penalties.	T	0.7000	360.0000	252.0000
1/19/2017	APD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr . Representation Regarding Legal research regarding options for removal of a lien from the title to real property	T	1.3000	360.0000	468.0000
1/25/2017	APD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Review applicable law for terminating an interest in real property; initial draft of petition regarding same	T	3.3000	360.0000	1,188.0000
1/29/2017	APD	11773-01 / Thomas Hebrank as Receiver for Washoe 3 Pr .Representation Regarding Revise and finalize Petition, prepare a notice of hearing, and proposed order designating the newspaper for publication	T	1.2000	360.0000	432.0000
				Component Type: Fees	30.1000	11,022.0000
				Component: T	30.1000	11,022.0000
				Grand Total	30.1000	11,022.0000

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Transactions Copy of Listing (Wide) Report

Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='11773-02'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
<i>Component: T</i>						
<i>Component Type: Fees</i>						
2/1/2017	APD	11773-02 / Thomas Hebrank as Receiver Revisions to Petition to Terminate Interest of Deceased Persons in Real Property; provide same to client, review client comments and several discussions with client regarding particulars from Petition and Exhibits; prepare notice of hearing; finalize petition	Reno Vista Partners T	3.9000	360.0000	1,404.0000
2/2/2017	APD	11773-02 / Thomas Hebrank as Receiver Final review of Petition and Notice of Hearing; instructions to assistant regarding filing;; review applicable statute for service requirements; instructions to assistant regarding the same	Reno Vista Partners T	1.6000	360.0000	576.0000
3/5/2017	APD	11773-02 / Thomas Hebrank as Receiver Attention to file for upcoming hearing; initial draft of proposed order granting Petition to Terminate an Interest of Deceased Persons in Real Property; review statute for compliance	Reno Vista Partners T	1.9000	360.0000	684.0000
3/15/2017	APD	11773-02 / Thomas Hebrank as Receiver Telephone conference with Andy Schooler regarding is objection to petition and disure for Louis share of trust distribution be reduced; telephone conference with Ted Fates regarding same and discussing strategy; telephone conference with Andy Schooler explaining away his misconceptions	Reno Vista Partners T	1.1000	360.0000	396.0000
3/28/2017	JWP	11773-02 / Thomas Hebrank as Receiver Preparation for hearing on Petition to Terminate an Interest in Real Property	Reno Vista Partners T	3.8000	360.0000	1,368.0000

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Search Description:

Fees and date 08/20/2013 to 08/08/2018 for matter id ='11773-02'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
3/28/2017	APD	11773-02 / Thomas Hebrank as Receiver Reno Vista Partners Review and respond to email of John Schooler, review and respond to emails from William Campbell; telephone conference with client regarding communications of John Schooler, Andy Schooler, and William Campbell and whether to grant request to continue hearing; telephone conference with counsel Mr. Puzey in preparation for tomorrow's hearing	T	1.8000	360.0000	648.0000
3/29/2017	JWP	11773-02 / Thomas Hebrank as Receiver Reno Vista Partners Prepare for and attendance at hearing on Petition to Terminate an Interest in Real Property	T	3.3000	360.0000	1,188.0000
3/29/2017	APD	11773-02 / Thomas Hebrank as Receiver Reno Vista Partners Telephone conference with counsel prior to and following hearing to discuss particulars of Petition and Deed of Trust, relay Judge's granting of Petition to client providing information on entry of order	T	0.9000	360.0000	324.0000
3/31/2017	APD	11773-02 / Thomas Hebrank as Receiver Reno Vista Partners Review order entered by Court granting Petition to be sure order entered was on same or substantial form as presented	T	0.3000	360.0000	108.0000
4/6/2017	APD	11773-02 / Thomas Hebrank as Receiver Reno Vista Partners Obtained certified copies of Order entered by Court; relay same to client requesting instructions for recording or provide to title company;	T	0.4000	360.0000	144.0000
				Component Type: Fees	19.0000	6,840.0000
				Component: T	19.0000	6,840.0000
				Grand Total	19.0000	6,840.0000

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EXHIBIT B

EXHIBIT B

Thomas Hebrank as Receiver for Western Financial

<u>Cost</u>	<u>Amount</u>
Service of Process	\$10.00
Courier Services	\$60.98
Photocopies	\$4.65
Postage	\$104.17
Online Research	\$22.60
Total	\$202.40

HOLLEY DRIGGS WALCH FINE WRAY PUZEY & THOMPSON

Transactions Copy of Listing (Wide) Report

Search Description:

costs and date 08/20/2013 to 04/30/2017 for matter id ='00016-108'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
<i>Component: fe</i>						
<i>Component Type: Hard Costs</i>						
12/9/2013		00016-108 / First Financial Planning Corp./San Diego / Gold Ridge Partners Federal Express	fe	1.0000	30.4900	30.4900
12/9/2013		00016-108 / First Financial Planning Corp./San Diego / Gold Ridge Partners Federal Express	fe	1.0000	30.4900	30.4900
			Component Type: Hard Costs	2.0000		60.9800
			Component: fe	2.0000		60.9800
<i>Component: pc</i>						
<i>Component Type: Soft Costs</i>						
11/21/2013		00016-108 / First Financial Planning Corp./San Diego / Gold Ridge Partners Photocopies	pc	21.0000	0.1500	3.1500
12/5/2013		00016-108 / First Financial Planning Corp./San Diego / Gold Ridge Partners Photocopies	pc	10.0000	0.1500	1.5000
			Component Type: Soft Costs	31.0000		4.6500
			Component: pc	31.0000		4.6500

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Search Description:

costs and date 08/20/2013 to 04/30/2017 for matter id ='00016-108'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
<i>Component: po</i>						
<i>Component Type: Soft Costs</i>						
12/5/2013		00016-108 / First Financial Planning Corp./San Diego / Gold Ridge Partners Postage E109	po	1.0000	0.9200	0.9200
			Component Type: Soft Costs	1.0000		0.9200
			Component po	1.0000		0.9200
<i>Component: pr</i>						
<i>Component Type: Hard Costs</i>						
10/11/2013		00016-108 / First Financial Planning Corp./San Diego / Gold Ridge Partners Pacer online research	pr	1.0000	22.6000	22.6000
			Component Type: Hard Costs	1.0000		22.6000
			Component: pr	1.0000		22.6000
			Grand Total	35.0000		89.1500

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Search Description:

costs and date 08/20/2013 to 04/30/2017 for matter id ='11773-02'

Date	Prof	MatterID/Client Sort Matter Description Narrative	Component Task Code	Units	Price	Value
<i>Component: po</i>						
<i>Component Type: Soft Costs</i>						
2/16/2017	DLO	11773-02 / Thomas Hebrank as Receiver for Postage	Reno Vista Partners po	1.0000	103.2500	103.2500
			Component Type: Soft Costs	1.0000		103.2500
			Component: po	1.0000		103.2500
<i>Component: sp</i>						
<i>Component Type: Hard Costs</i>						
4/27/2017		11773-02 / Thomas Hebrank as Receiver for Service of process	Reno Vista Partners sp	1.0000	10.0000	10.0000
			Component Type: Hard Costs	1.0000		10.0000
			Component: sp	1.0000		10.0000
			Grand Total	2.0000		113.2500