

1 ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
2 DAVID R. ZARO (BAR NO. 124334)  
865 South Figueroa Street, Suite 2800  
3 Los Angeles, California 90017-2543  
Phone: (213) 622-5555  
4 Fax: (213) 620-8816  
E-Mail: dzaro@allenmatkins.com

5 ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
6 EDWARD G. FATES (BAR NO. 227809)  
One America Plaza  
7 600 West Broadway, 27th Floor  
8 San Diego, California 92101-0903  
Phone: (619) 233-1155  
9 Fax: (619) 233-1158  
E-Mail: tfates@allenmatkins.com

10 Attorneys for Receiver  
11 THOMAS C. HEBRANK

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

14  
15 SECURITIES AND EXCHANGE  
COMMISSION,

16 Plaintiff,

17 v.

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

21 Defendants.  
22  
23  
24  
25  
26  
27  
28

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

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

Date: October 1, 2021  
Time: 1:30 p.m.  
Ctrm.: 2D  
Judge: Hon. Gonzalo P. Curiel

**TABLE OF CONTENTS**

	<b><u>Page</u></b>
I. INTRODUCTION .....	5
II. FINAL APPLICATION PERIOD .....	6
III. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED.....	7
A. Categories and Descriptions of Work .....	7
1. General Receivership.....	7
2. Reporting .....	7
3. Operations and Asset Sales.....	8
4. Claims and Distributions .....	8
5. Employment/Fees .....	8
B. Summary of Expenses Requested for Reimbursement.....	8
IV. APPROVAL OF PRIOR INTERIM FEE APPLICATIONS AND PAYMENT OF HOLDBACKS .....	9
V. ESTIMATED FEES FOR REMAINING LEGAL WORK.....	10
VI. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE ALLOWED.....	11
VII. CONCLUSION .....	13

# TABLE OF AUTHORITIES

Page(s)

## Cases

<i>Gaskill v. Gordon</i> , 27 F.3d 248 (7th Cir. 1994).....	11
<i>SEC v. Elliot</i> , 953 F.2d 1560 (11th Cir. 1992).....	11

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"),  
 2 counsel for Thomas C. Hebrank ("Receiver"), Court-appointed receiver for First  
 3 Financial Planning Corporation d/b/a Western Financial Planning Corporation  
 4 ("Western"), and its subsidiaries and the General Partnerships listed in Schedule 1  
 5 to the Preliminary Injunction Order entered on March 13, 2013 (collectively,  
 6 "Receivership Entities"), hereby submits this final application for approval of  
 7 payment of fees and reimbursement of expenses ("Application"). This Application  
 8 is filed concurrently with the Receiver's Motion to Conclude the Receivership  
 9 ("Motion to Conclude") as well as the Receiver's fee application.

10 Allen Matkins seeks approval of the total fees and costs incurred by the firm  
 11 for the receivership in the amount of \$1,940,546.66, which includes the following:

- 12 • Approval and payment of fees and costs incurred during the five-  
 13 month period from January 1, 2021, through May 31, 2021 ("Final  
 14 Application Period") of \$21,297.00 and \$954.46;
- 15 • Final approval of the firm's thirty-four interim fee applications<sup>1</sup> and of  
 16 the \$1,502,667.50 (\$1,471,904.21 of fees and \$30,763.29 of expenses)  
 17 previously paid in connection with those applications;
- 18 • Approval and payment of fees held back from Allen Matkins' thirty-  
 19 four interim fee applications in the total amount of \$385,627.70  
 20 ("Holdback Amount"); and
- 21 • Approval of estimated fees and costs of up to \$30,000 for remaining  
 22 legal work to conclude the receivership.

23  
 24  
 25  
 26  
 27 <sup>1</sup> Allen Matkins' thirty-four interim fee applications, along with bills reflecting the  
 28 work performed during each period can be found at Dkt. Nos. 64, 176, 198,  
 478, 526, 567, 601, 819, 962, 1092, 1097, 1127, 1154, 1328, 1330, 1386, 1434,  
 1465, 1490, 1522, 1559, 1597, 1620, 1654, 1691, 1710, 1732, 1744, 1751, 1759,  
 1773, 1787, 1793, and 1806 and are incorporated herein by this reference.

## I. INTRODUCTION

Allen Matkins has diligently assisted the Receiver in carrying out his Court-ordered duties. If the Motion to Conclude filed herewith and the fee applications are granted, the final distribution amount will be \$4,287,535; as such, the Receiver will distribute a total of about \$23.3 million to investors under the Distribution Plan approved by the Court, meaning investors with approved claims will recover about 17 cents for each dollar of their investment losses.

The Receiver, with Allen Matkins' assistance, has completed his Court-ordered duties, including securing, preserving and protecting the Receivership Entities' assets, completing a detailed forensic accounting of the sources and uses of funds of the Receivership Entities, completing sales of receivership real and personal property, pursuing claims against third parties to recover sums for the benefit of the receivership estate, completing a claims process, and making interim distributions to those with allowed claims.

The Receiver and Allen Matkins have filed detailed reports on activities on a quarterly basis throughout the case and have sought Court authority and approval of all sales of assets, pursuits of litigation, settlements of litigation, as well as all aspects of the investor claims process and distribution of receivership estate funds. The Receiver and Allen Matkins have also filed interim fee applications on a quarterly basis throughout the case, including a hold back of 20% of fees incurred from all but three applications;<sup>2</sup> all of the interim fee applications have been granted.

With respect to projected fees and costs for remaining work (including work performed since June 1, 2021 and to be performed through the close of the receivership), as reflected in the Motion to Conclude and as further laid out below,

---

<sup>2</sup> In connection with Allen Matkins' second, third, and fourth interim fee applications, the Court approved a payment of 70% of fees incurred, with a holdback of 30% for each of those applications.

1 the legal work necessary to conclude the receivership includes: (1) assisting in  
 2 preparing the Motion to Conclude (including responding to any opposition and  
 3 attending the hearing, as necessary); (2) advising the Receiver regarding entry of a  
 4 consent judgment with the Securities and Exchange Commission resolving the  
 5 remaining claims against Western; (3) advising the Receiver on making  
 6 administrative payments and final distributions to approved claimants and  
 7 establishing a reserve for remaining administrative payments; (4) assisting the  
 8 Receiver with his final accounting of reserve funds and declaration (to be filed after  
 9 the completion of remaining tasks); (5) advising the Receiver on remaining tax  
 10 issues and the final turnover of funds to United States Treasury; and (6) otherwise  
 11 assisting the Receiver in the discharge of his remaining duties.

12 Accordingly, Allen Matkins requests approval of its total fees and costs for  
 13 the receivership in the amount of \$1,940,546.66, including final approval of the  
 14 \$1,502,667.50 (\$1,471,904.21 of fees and \$30,763.29 of expenses) previously paid  
 15 to the firm on an interim basis, payment of fees and costs incurred during the Final  
 16 Application Period of \$21,297.00 and \$954.46, payment of fees held back from its  
 17 thirty-four interim fee applications of \$385,627.70, and authorization for the  
 18 Receiver to pay projected fees and costs to complete the legal tasks remaining to  
 19 conclude the receivership of \$30,000.

20 The Securities and Exchange Commission ("Commission") has reviewed this  
 21 Application, along with the Receiver's fee application filed concurrently herewith.  
 22 The Commission does not oppose the applications.

## 23 **II. FINAL APPLICATION PERIOD**

24 The fees incurred by Allen Matkins during the Final Application Period (a  
 25 five-month period) total \$21,297.00 in fees for a total of 43.40 hours worked. The  
 26 firm has provided its services in the following categories, as discussed in further  
 27 detail below and as set forth task-by-task in Exhibit A:  
 28

Category	Hours	Total
General Receivership	1.80	\$931.50
Reporting	2.10	\$1,086.75
Operations and Asset Sales	30.70	\$14,724.75
Claims and Distributions	8.10	\$4,191.75
Employment/Fees	0.70	\$362.25
Total Fees	43.40	\$21,297.00

### III. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED

Allen Matkins has worked diligently and efficiently to assist the Receiver with important legal issues necessary to preserve and protect the substantial value of receivership estate assets and in carrying out her Court-ordered duties and therefore should be compensated for its work. As reflected in the bills attached as Exhibit A, legal work performed by Allen Matkins' attorneys and staff during the Final Application Period did not overlap with or duplicate the Receiver's work. Exhibit A provides a detailed list of each and every charge, sorted by category of work, person executing the work, and task performed.

#### A. Categories and Descriptions of Work

##### 1. General Receivership

This category includes time spent addressing issues relating to Defendant Louis Schooler's personal assets, as well as advising the Receiver regarding the steps/process for wrapping up the receivership. The reasonable and necessary fees for work in this category total \$931.50.

##### 2. Reporting

This category includes time spent preparing the Receiver's Thirty-Fourth Interim Report filed on February 23, 2021. Dkt. No. 1799. The report includes detailed updates regarding closed and pending sales of properties, and receipts and disbursements for the receivership estate. The reasonable and necessary fees for work in this category total \$1,086.75.

1                   3.     Operations and Asset Sales

2           Allen Matkins' time in this category focused on sales of receivership  
3 properties via the Modified Orderly Sale Process. During the Thirty-Third  
4 Application Period, this work focused on the Washoe III property, Western-Owned  
5 Dayton property, and 79-acre Minden property. The reasonable and necessary fees  
6 for Allen Matkins' work in this category total \$14,724.75.

7                   4.     Claims and Distributions

8           Allen Matkins assisted with the initial work on the Receiver's motion to  
9 make a final distribution and conclude the receivership (which is filed concurrently  
10 herewith), as well as in preparing a monthly case update to investors. The  
11 reasonable and necessary fees for this work total \$4,191.75.

12                  5.     Employment/Fees

13           Although fee applications are a necessary component of federal equity  
14 receiverships, neither the Receiver nor his professionals bill time for preparing their  
15 own detailed applications. Allen Matkins assisted the Receiver in preparing his  
16 Thirty-Third and Thirty-Fourth Interim Fee Applications, and in conferring with  
17 counsel for the Securities and Exchange Commission regarding the fee  
18 applications. The reasonable and necessary fees for this work total \$362.25.

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

20           Allen Matkins requests the Court approve reimbursement of \$954.46 in out-  
21 of-pocket costs. The costs are specifically broken down by category as follows:

Category	Total
Messenger/FedEx Fees	\$948.71
Document Searches (incl. PACER, Lexis, Secretary of State)	\$5.50
Duplication/Postage/Facsimile	\$0.25
TOTAL	\$ 954.46



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

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

<b>FEE APPLICATION</b>	<b>FEES INCURRED</b>	<b>INTERIM 80% PAYMENT<sup>3</sup></b>	<b>20% HOLDBACK</b>
First	\$31,969.35	\$25,575.48	\$6,393.87
Second	\$45,817.65	\$32,072.36	\$13,745.30
Third	\$50,899.50	\$35,629.65	\$15,269.85
Fourth	\$44,496.00	\$31,147.20	\$13,348.80
Fifth	\$73,707.75	\$58,966.20	\$14,741.55
Sixth	\$59,170.95	\$47,336.76	\$11,834.19
Seventh	\$51,765.30	\$41,412.24	\$10,353.06
Eighth	\$47,171.70	\$37,737.36	\$9,434.34
Ninth	\$86,642.55	\$69,314.04	\$17,328.51
Tenth	\$108,140.85	\$86,512.68	\$21,628.17
Eleventh	\$98,756.10	\$79,004.88	\$19,751.22
Twelfth	\$54,722.25	\$43,777.80	\$10,944.45
Thirteenth	\$35,397.00	\$28,317.60	\$7,079.40
Fourteenth	\$19,852.20	\$15,881.76	\$3,970.44
Fifteenth	\$100,615.05	\$80,492.04	\$20,123.01
Sixteenth	\$169,132.95	\$135,306.36	\$33,826.59
Seventeenth	\$99,325.35	\$79,460.28	\$19,865.07
Eighteenth	\$85,655.70	\$68,524.56	\$17,131.14
Nineteenth	\$81,124.20	\$64,899.36	\$16,224.84
Twentieth	\$82,392.30	\$65,913.84	\$16,478.46
Twenty-First	\$65,349.90	\$52,279.92	\$13,069.98
Twenty-Second	\$76,565.00	\$61,252.00	\$15,313.00
Twenty-Third	\$64,172.45	\$51,337.96	\$12,834.49

<sup>3</sup> For Allen Matkins' second, third, and fourth interim fee applications, the interim payment amount approved by the Court was 70% of fees incurred and the holdback amount was 30% of fees incurred.

<b>FEE APPLICATION</b>	<b>FEES INCURRED</b>	<b>INTERIM 80% PAYMENT<sup>3</sup></b>	<b>20% HOLDBACK</b>
Twenty-Fourth	\$32,690.25	\$26,152.20	\$6,538.05
Twenty-Fifth	\$36,017.55	\$28,814.04	\$7,203.51
Twenty-Sixth	\$23,123.05	\$18,498.44	\$4,624.61
Twenty-Seventh	\$19,599.80	\$15,679.84	\$3,919.96
Twenty-Eighth	\$35,789.05	\$28,631.24	\$7,157.81
Twenty-Ninth	\$16,348.50	\$13,078.80	\$3,269.70
Thirtieth	\$4,083.75	\$3,267.00	\$816.75
Thirty-First	\$7,110.00	\$5,688.00	\$1,422.00
Thirty-Second	\$18,934.20	\$15,147.36	\$3,786.84
Thirty-Third	\$20,864.65	\$16,691.72	\$4,172.93
Thirty-Fourth	\$10,129.05	\$8,103.24	\$2,025.81
<b>TOTAL</b>	<b>\$1,857,531.90</b>	<b>\$1,471,904.21</b>	<b>\$385,627.70</b>

## **V. ESTIMATED FEES FOR REMAINING LEGAL WORK**

The projected fees for remaining legal work from June 1, 2021 forward that is necessary to close the receivership is as follows:

<b>Legal Work</b>	<b>Estimated Fees &amp; Costs</b>
Assist in preparing final report, motion to conclude the receivership, proposed final discharge order and related documents/exhibits, meet and confer with counsel for SEC, address any opposition to motion, attend hearing (if necessary)	\$13,500
Assist with issues relating to Receiver's consent to entry of judgment against Western, meet and confer with counsel for SEC	\$3,000

Legal Work	Estimated Fees & Costs
Assist with legal issues relating to investor distribution checks, inquiries from investors, uncashed checks and related issues	\$3,500
Assist with legal issues relating to closing of remaining receivership entities, destruction of records, and preparation of final tax returns	\$5,500
Assist with preparing final declaration of Receiver regarding completion of closing tasks and request for entry of final discharge order	\$4,500
Total	\$30,000

Accordingly, Allen Matkins requests that the Receiver be authorized to pay the actual fees and costs for legal work from June 1, 2021 forward to close the receivership up to a total of \$30,000.

**VI. THE FEES AND COSTS ARE  
REASONABLE AND SHOULD BE ALLOWED**

"As a general rule, the expenses and fees of a receivership are a charge upon the property administered." *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994). These expenses include the fees and expenses of the Receiver and her professionals, including Allen Matkins. Decisions regarding the timing and amount of an award of fees and costs are committed to the sound discretion of the Court. *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992) (rev'd in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).

In its Order Granting in Part First Interim Fee Applications ("First Fee Order"), the Court analyzed the case law regarding approval of interim fee applications in regulatory receiverships and determined the following factors should be considered: (1) the complexity of the receiver's tasks; (2) the fair value of

1 the time, labor, and skill measured by conservative business standards; (3) the  
2 quality of work performed, including the results obtained and the benefit to the  
3 receivership estate; (4) the burden the receivership estate may safely be able to  
4 bear; and (5) the Commission's opposition or acquiescence. Dkt. No. 169, p. 7.

5 Throughout the receivership, the Court has consistently held that these  
6 factors have been satisfied in approving all interim fee applications. The Receiver,  
7 with Allen Matkins' assistance, has efficiently managed the assets of the  
8 receivership estate through challenging circumstances, preserved the value of those  
9 assets, and, when authorized by the Court to do so, conducted an orderly and  
10 efficient sale process, including giving appropriate notices and opportunities for  
11 investors to weigh in or even participate in sales of properties. These efforts have  
12 resulted in a total of approximately \$23.3 million being distributed to investors with  
13 allowed claims, a sum that is considerably more than what was projected when the  
14 Court authorized the Receiver to begin selling properties.

15 Throughout the receivership, Allen Matkins has endeavored to staff matters  
16 as efficiently as possible while remaining cognizant of the complexity of issues  
17 presented. All of Allen Matkins' requests for fees have been based on the firm's  
18 customary billing rates charged for comparable services provided in other matters,  
19 less a 10% discount. Allen Matkins further agreed during the case to freeze its  
20 hourly rates, providing a substantial savings to the estate. In addition, over the  
21 course of the receivership, Allen Matkins has written off \$65,263.35 in fees and  
22 \$8,395.29 in costs in recognition of the need to conserve receivership assets.

23 The work performed by Allen Matkins throughout the receivership was  
24 essential to carrying out the Receiver's Court-ordered duties. The Receiver and  
25 Allen Matkins have worked diligently since the Receiver's appointment to preserve  
26 and protect the assets of the receivership estate, to investigate and pursue claims  
27 where appropriate, to efficiently market and sell properties through licensed  
28 brokers, and to maximize the funds available for ultimate distribution to investors.

1 **VII. CONCLUSION**

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

- 3 1. Approving the firm's total fees and costs for the receivership in the  
4 amount of \$1,940,546.66, including:
- 5 a. Approval and authority to pay fees of \$21,297.00 and costs of  
6 \$954.46 for the Final Application Period;
  - 7 b. Approval, on a final basis, of the \$1,502,667.50 (\$1,471,904.21  
8 of fees and \$30,763.29 of expenses) paid to Allen Matkins  
9 pursuant to its thirteen interim fee applications;
  - 10 c. Approval and authority to pay fees held back from Allen  
11 Matkins' thirteen interim fee applications in the amount of  
12 \$385,627.70;
  - 13 d. Approval and authority to pay projected fees and costs from the  
14 reserve in the amount of up to \$30,000 to complete the legal  
15 tasks remaining to conclude the receivership; and
- 16 2. Granting such other and further relief as the Court deems appropriate.

17  
18 Dated: July 19, 2021

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

19 By: /s/ Edward Fates

20 EDWARD G. FATES  
21 Attorneys for Receiver  
22 THOMAS C. HEBRANK  
23  
24  
25  
26  
27  
28

**EXHIBIT INDEX**

Exhibit A	Detailed Time Reports	15
-----------	-----------------------	----

}

05/28/21 19:43:58 PROFORMA STATEMENT FOR MATTER 372640.00002 (Thomas C. Hebrank, as Receiver for Weste) (General Receivership)

**Preliminary Billing Form**Billing Atty: 001665 - Fates, Edward  
(Ted)

Matter #: 372640.00002

Client Name: Thomas C. Hebrank, as Receiver for Weste

Date of Last Billing: 03/23/21

Matter Name: General Receivership

Proforma Number: 1094658

Client/Matter Joint Group # 372640-1

**Fees for Matter 372640.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/11/21	8315759	Call from fiduciary for L. Schooler trust re: SEC judgment issues (.3) communications with SEC counsel re: same (.1)	Fates, Edward (Ted)	0.40	207.00	207.00	WO	HD	TR
03/10/21	8374717	Call with SEC counsel re: notice concerning frozen Schooler account (.2) discuss same with Receiver and G. Rodriguez (.3)	Fates, Edward (Ted)	0.50	258.75	465.75	WO	HD	TR
03/15/21	8379132	Communications with Receiver and counsel for SEC regarding frozen Schooler account	Fates, Edward (Ted)	0.30	155.25	621.00	WO	HD	TR
03/17/21	8387124	Discuss plan and timing for wrapping up receivership with Receiver and tax accountant	Fates, Edward (Ted)	0.40	207.00	828.00	WO	HD	TR
04/28/21	8425052	Advise Receiver on tax issues relating to closing receivership	Fates, Edward (Ted)	0.20	103.50	931.50	WO	HD	TR

**Disbursements for Matter 372640.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt
------------	-------	------	----------	-----

05/28/21 19:43:58 PROFORMA STATEMENT FOR MATTER 372640.00002 (Thomas C. Hebrank, as Receiver for Weste) (General Receivership)

**Disbursements for Matter 372640.00002 (General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Type</b>	<b>Quantity</b>	<b>Amt</b>				
07/18/19	180888	MSNGR – Messenger - - Nationwide Legal, LLC, USDC SOUTHERN DISTRICT, COURTESY COPY^11007	1.00	17.00	WO	HD	TR	_____
07/19/19	180889	MSNGR – Messenger - - Nationwide Legal, LLC, USDC SOUTHERN DISTRICT, COURTESY COPY^11007	1.00	11.35	WO	HD	TR	_____
07/24/19	180835	MSNGR – Messenger - - Nationwide Legal, LLC, USDC SOUTHERN DISTRICT, OBTAIN A CERTIFIED COPY^11007	1.00	41.00	WO	HD	TR	_____
07/30/19	180836	MSNGR – Messenger - - Nationwide Legal, LLC, USDC SOUTHERN DISTRICT, OBTAIN A CERTIFIED COPY^11007	1.00	41.00	WO	HD	TR	_____
07/07/20	2655075	MSNGR – Federal Express - Ship To: Ms Greta Kjolhede	0.00	19.68	WO	HD	TR	_____
07/07/20	2656222	DCSRCH – First Legal Network LLC - USDC - San Diego, ORDER APPROVING SALE OF SANTA FE PROPERTIES	0.00	88.75	WO	HD	TR	_____
07/24/20	2658393	MSNGR – Federal Express - Ship To: Ms Amy Gutierrez, Escrow Offi	0.00	18.60	WO	HD	TR	_____
07/24/20	2660066	DCSRCH – Document Research - - First Legal LLC - USDC-SAN DIEGO - ORDER APPROVING SALE WASHOE; ORDER APPROVING SALE MINDEN; Advance \$45.00	0.00	135.50	WO	HD	TR	_____
08/12/20	2660937	DCSRCH – First Legal Network, LLC - USD -San Diego, CERTIFIED ORDER GRANTING RECEIVER'S MOTION	0.00	88.75	WO	HD	TR	_____
08/12/20	2660938	DCSRCH – First Legal Network, LLC - USDC-San Diego, CERTIFIED COPY OF ORDER GRANTING RECEIVER'S MOTION	0.00	89.75	WO	HD	TR	_____
08/17/20	2668312	DCSRCH – First Legal - Allen Matkins, San Diego; ORDER GRANTING MOTION FOR APPROVAL OF SALE OF THE SRF RI; Advance \$17.00	0.00	89.75	WO	HD	TR	_____
09/01/20	2665773	MSNGR – Federal Express - Ship To: Amy Gutierrez, Escrow Officer	0.00	18.60	WO	HD	TR	_____
02/08/21	2694650	DCSRCH – First Legal Network, LLC - USDC - San Diego; ORDER APPROVING SALE	0.00	53.00	WO	HD	TR	_____
02/09/21	2694440	MSNGR – Federal Express - Ship To: Ms Amy Gutierrez, Escrow Offi	0.00	19.87	WO	HD	TR	_____
02/10/21	2701730	DCSRCH – Document Search - - PACER - 10/20 -12/20 Usage	0.00	5.50	WO	HD	TR	_____
03/08/21	2698592	COLOR – Duplication - Color Copies	1.00	0.25	WO	HD	TR	_____



05/28/21 19:43:58 PROFORMA STATEMENT FOR MATTER 372640.00002 (Thomas C. Hebrank, as Receiver for Weste) (General Receivership)

**Disbursements for Matter 372640.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt				
03/08/21	2700944	DCSRCH – First Legal Network, LLC - USDC-San Diego; OBTAIN A CERTIFIED COPY OF DOC#1803 ORDER	0.00	44.00	WO	HD	TR	_____
03/10/21	2700946	DCSRCH – First Legal Network, LLC - USDC-San Diego; OBTAIN A CERTIFIED COPY OF ORDER GRANTING REQUEST	0.00	54.00	WO	HD	TR	_____
03/24/21	2704204	MSNGR – Federal Express - Ship To: Ms Amy Gutierrez, Escrow Offi	0.00	20.11	WO	HD	TR	_____
03/24/21	2709134	DCSRCH – Document Research - First Legal LLC - ORDER APPROVING SALE; Advance \$15.00	0.00	43.00	WO	HD	TR	_____
04/19/21	2711883	DCSRCH – Document Research - First Legal - San Diego ORDER GRANTING REQUEST TO APPROVE SALE Advance \$17.00	0.00	55.00	WO	HD	TR	_____

**Proforma Summary****Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.80	517.50	931.50
		1.80		\$931.50
Subtotal Fees				\$931.50
Discount				0.00
Total Fees				931.50
Total Disbursements				954.46

**Attorney Billing Instructions**

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

**Billing Instructions**

EXPIRES 6/30/2021: 7/2016 rates less 10% DISCOUNT ON FEES (rated code 10)- AUTOMATIC; copies @ .05; no text editing

**Account Summary – As Of 06/01/21**

Fiscal YTD

Calendar YTD

LTD

05/28/21 19:43:58 PROFORMA STATEMENT FOR MATTER 372640.00002 (Thomas C. Hebrank, as Receiver for Weste) (General Receivership)

	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,989.50	931.50	1,058.00	1,226.23	931.50	294.73	1,885.96	931.50	954.46
Unbilled Adj	1.00	0.00	1.00	0.00	0.00	0.00	11.87	10.87	1.00
Billed	201.50	103.50	98.00	80.00	0.00	80.00	392,378.17	392,378.17	30,454.84
Collected	201.50	103.50	98.00	80.00	0.00	80.00	422,833.01	392,378.17	30,454.84
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b><i>WIP</i></b>	<b><i>Total</i></b>	<b><i>Fees</i></b>	<b><i>Costs</i></b>						
<b><i>Balance</i></b>	<b><i>1,898.96</i></b>	<b><i>931.50</i></b>	<b><i>967.46</i></b>						
<b><i>AR Balance</i></b>	<b><i>0.00</i></b>	<b><i>0.00</i></b>	<b><i>0.00</i></b>						
<b><i>Unalloc</i></b>	<b><i>0.00</i></b>								
<b><i>Payment</i></b>									
<b><i>Client Trust</i></b>	<b><i>0.00</i></b>								
<b><i>Balance</i></b>									

**Billing Address**

Thomas C. Hebrank, as Receiver for Western Financial  
c/o E3 Advisors  
501 West Broadway, Suite 800  
San Diego, CA 92101

}

05/28/21 19:44:02 PROFORMA STATEMENT FOR MATTER 372640.00004 (Thomas C. Hebrank, as Receiver for Weste) (Reporting)

**Preliminary Billing Form**Billing Atty: 001665 - Fates, Edward  
(Ted)

Matter #: 372640.00004

Client Name: Thomas C. Hebrank, as Receiver for Weste

Date of Last Billing: 04/26/21

Matter Name: Reporting

Proforma Number: 1094658

Client/Matter Joint Group # 372640-1

**Fees for Matter 372640.00004.(Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
02/08/21	8343576	Work on Receiver's 34th interim report (1.4) discuss same with Receiver and G. Rodriguez (.3)	Fates, Edward (Ted)	1.70	879.75	879.75	WO	HD	TR
02/23/21	8357295	Revise and finalize Receiver's 34th interim report and exhibits	Fates, Edward (Ted)	0.40	207.00	1,086.75	WO	HD	TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.10	517.50	1,086.75
		2.10		\$1,086.75
Subtotal Fees				\$1,086.75
Discount				0.00
Total Fees				1,086.75
Total Disbursements				0.00

**Attorney Billing Instructions**

( )	BILL ALL	( )	Hold
( )	BILL FEES ONLY	( )	Write Off

05/28/21 19:44:02 PROFORMA STATEMENT FOR MATTER 372640.00004 (Thomas C. Hebrank, as Receiver for Weste) (Reporting)

( ) BILL COST ONLY ( ) Transfer All**Billing Instructions**

EXPIRES 6/30/2021: 7/2016 rates less 10% DISCOUNT ON FEES (rated code 10)- AUTOMATIC; copies @ .05; no text editing

**Account Summary – As Of 06/01/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,881.25	3,881.25	0.00	1,086.75	1,086.75	0.00	1,086.75	1,086.75	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	38.12	38.12	0.00
Billed	5,184.12	5,175.00	9.12	2,803.62	2,794.50	9.12	172,159.04	172,159.04	388.45
Collected	5,184.12	5,175.00	9.12	3,838.62	3,829.50	9.12	172,547.49	172,159.04	388.45
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>Balance</b>	<b>1,086.75</b>	<b>1,086.75</b>	<b>0.00</b>						
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

Thomas C. Hebrank, as Receiver for Western Financial  
 c/o E3 Advisors  
 501 West Broadway, Suite 800  
 San Diego, CA 92101

}

05/28/21 19:44:06 PROFORMA STATEMENT FOR MATTER 372640.00005 (Thomas C. Hebrank, as Receiver for Weste) (Operations &amp; Asset Sales)

**Preliminary Billing Form**Billing Atty: 001665 - Fates, Edward  
(Ted)

Matter #: 372640.00005

Client Name: Thomas C. Hebrank, as Receiver for Weste

Date of Last Billing: 04/26/21

Matter Name: Operations &amp; Asset Sales

Proforma Number: 1094658

Client/Matter Joint Group # 372640-1

**Fees for Matter 372640.00005.(Operations & Asset Sales)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/05/21	8310288	Follow up communications with counsel for prior Washoe III buyer and potential overbidder re: prior deposit and bid qualification issues (.9) initial work on overbid purchase and sale agreement (.6)	Fates, Edward (Ted)	1.50	776.25	776.25	WO	HD	TR
01/05/21	8311434	Review issues related to Minden property.	Lorenzen, Jonathan	0.20	81.90	858.15	WO	HD	TR
01/05/21	8311811	Review and analyze correspondence with counsel for AJR Properties re: the overbid purchase and sale agreement for the Washoe III property.	Thiels, Megan	0.60	246.00	1,104.15	WO	HD	TR
01/08/21	8314560	Continue drafting, editing and revising the new overbid purchase and sale agreement with ARJ Properties for the Washoe III property.	Thiels, Megan	2.10	861.00	1,965.15	WO	HD	TR
01/08/21	8314628	Review issues related to Minden Purchase and Sale Agreement (0.5); review issues related to Washoe property (0.2).	Lorenzen, Jonathan	0.70	286.65	2,251.80	WO	HD	TR

05/28/21 19:44:06 PROFORMA STATEMENT FOR MATTER 372640.00005 (Thomas C. Hebrank, as Receiver for Weste) (Operations &amp; Asset Sales)

**Fees for Matter 372640.00005.(Operations & Asset Sales)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/11/21	8315469	Review correspondence and draft of Purchase and Sale Agreement for Washoe III.	Lorenzen, Jonathan	0.90	368.55	2,620.35	WO	HD	TR	_____
01/11/21	8315965	Address issues re: purchase and sale agreement for overbid for Washoe III property (.3) communications with counsel for overbidder re: same (.2) work on notice re: lack of overbids for WFPC Dayton property (.3)	Fates, Edward (Ted)	0.80	414.00	3,034.35	WO	HD	TR	_____
01/11/21	8334678	Continue editing and revising the overbid purchase and sale agreement with AJR Properties for the Washoe III property; correspond with the client re: the such agreement.	Thiels, Megan	0.40	164.00	3,198.35	WO	HD	TR	_____
01/12/21	8316686	Address issues re: second overbid purchase and sale agreement for Washoe III property	Fates, Edward (Ted)	0.20	103.50	3,301.85	WO	HD	TR	_____
01/13/21	8334786	Draft, edit and revise the overbid purchase and sale agreement with Lobco Investments for the Washoe III property; correspond with the client re: such agreement.	Thiels, Megan	1.40	574.00	3,875.85	WO	HD	TR	_____
01/14/21	8318709	Review status of Minden water issues.	Lorenzen, Jonathan	0.20	81.90	3,957.75	WO	HD	TR	_____
01/18/21	8321133	Begin reviewing and analyzing ARJ Properties' requested edits to the overbid PSA for the Washoe III property.	Thiels, Megan	0.20	82.00	4,039.75	WO	HD	TR	_____
01/18/21	8321524	Review comments regarding Washoe III property.	Lorenzen, Jonathan	0.20	81.90	4,121.65	WO	HD	TR	_____

05/28/21 19:44:06 PROFORMA STATEMENT FOR MATTER 372640.00005 (Thomas C. Hebrank, as Receiver for Weste) (Operations &amp; Asset Sales)

**Fees for Matter 372640.00005.(Operations & Asset Sales)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
01/18/21	8322966	Address comments to purchase and sale agreement and issues raised by counsel for overbidder for Washoe III property, discuss same with G. Rodriguez	Fates, Edward (Ted)	0.70	362.25	4,483.90	WO	HD	TR	_____
01/19/21	8334968	Edit and revise the overbid purchase and sale agreement with ARJ Properties for the Washoe III property.	Thiels, Megan	0.80	328.00	4,811.90	WO	HD	TR	_____
01/20/21	8323199	Review comments to Overbid Purchase and Sale Agreement for Washoe III.	Lorenzen, Jonathan	0.60	245.70	5,057.60	WO	HD	TR	_____
01/20/21	8323394	Finish editing and revising the overbid purchase and sale agreement with ARJ Properties for the Washoe III property; correspond with the client re: such revised draft of the agreement.	Thiels, Megan	0.60	246.00	5,303.60	WO	HD	TR	_____
01/20/21	8323395	Communications with G. Rodriguez and counsel for overbidder re: overbid purchase and sale agreement and title report	Fates, Edward (Ted)	0.70	362.25	5,665.85	WO	HD	TR	_____
01/25/21	8327473	Communications with G. Rodriguez re: title issues relating to Washoe III property and overbid (.2) communications with counsel for overbidder re: execution of overbid purchase and sale agreement (.2)	Fates, Edward (Ted)	0.40	207.00	5,872.85	WO	HD	TR	_____
01/27/21	8329681	Communications with counsel for Washoe III overbidder re: executing of overbid purchase and sale agreement (.2) discuss same and next steps with Receiver and G. Rodriguez (.4)	Fates, Edward (Ted)	0.60	310.50	6,183.35	WO	HD	TR	_____

05/28/21 19:44:06 PROFORMA STATEMENT FOR MATTER 372640.00005 (Thomas C. Hebrank, as Receiver for Weste) (Operations &amp; Asset Sales)

**Fees for Matter 372640.00005.(Operations & Asset Sales)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>	
01/29/21	8332410	Review and analyze special escrow instructions for Washoe III overbidder deposit per terms of overbid purchase and sale agreement	Fates, Edward (Ted)	0.20	103.50	6,286.85	WO	HD	TR
02/01/21	8358563	Revisions to Washoe III sale motion relating to overbid and resolution of dispute re: prior sale and prior deposit (1.2) discuss same with G. Rodriguez (.2) advise Receiver and G. Rodriguez on issues relating to WFPC Dayton sale and Washoe III sale and buyer's closing deadlines for 1031 exchanges (.6) communications with court clerk re: timing issues for WFPC Dayton sale (.4) work on Receiver declaration, notice of motion and proposed order for Washoe III sale motion (.9)	Fates, Edward (Ted)	3.30	1,707.75	7,994.60	WO	HD	TR
02/02/21	8338857	Communications with Court clerk re: hearing date for WFPC Dayton sale motion (.2) advise Receiver and G. Rodriguez re: same and discuss Washoe III overbid/deposit issues (.3)	Fates, Edward (Ted)	0.50	258.75	8,253.35	WO	HD	TR
02/03/21	8340738	Advise Receiver and G. Rodriguez re: order moving hearing date for WFPC Dayton sale motion up to 2/19	Fates, Edward (Ted)	0.20	103.50	8,356.85	WO	HD	TR
02/04/21	8358560	Discuss timing and strategy re: Washoe III overbid and sale approval with Receiver and G. Rodriguez	Fates, Edward (Ted)	0.40	207.00	8,563.85	WO	HD	TR
02/05/21	8341752	Communications with G. Rodriguez re: status and next steps re: Washoe III overbid and sale motion (.3) communications with court clerk re: hearing date for sale motion	Fates, Edward (Ted)	0.70	362.25	8,926.10	WO	HD	TR



05/28/21 19:44:06 PROFORMA STATEMENT FOR MATTER 372640.00005 (Thomas C. Hebrank, as Receiver for Weste) (Operations &amp; Asset Sales)

**Fees for Matter 372640.00005.(Operations & Asset Sales)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b> (.2) finalize sale motion and supporting documents for filing (.2)	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
02/08/21	8343440	Discuss updates to sale-related information on receivership website with Receiver and G. Rodriguez (.3) revisions to monthly case update for investors, communications with G. Rodriguez re: same (.4)	Fates, Edward (Ted)	0.70	362.25	9,288.35	WO	HD	TR	_____
02/08/21	8343698	Advise Receiver and G. Rodriguez re: order approving WFPC Dayton sale and steps for title/closing	Fates, Edward (Ted)	0.30	155.25	9,443.60	WO	HD	TR	_____
02/22/21	8355475	Work on notice of receipt of overbids for Washoe III sale (.4) communications with G. Rodriguez re: same (.2)	Fates, Edward (Ted)	0.60	310.50	9,754.10	WO	HD	TR	_____
02/23/21	8356930	Communications with G. Rodriguez re: notice of overbids for Washoe III and information for Minden property sale approval motion (.6) work on sale approval motion (1.6) analyze and advise on Washoe III auction instructions for bidders (.4)	Fates, Edward (Ted)	2.40	1,242.00	10,996.10	WO	HD	TR	_____
02/24/21	8358694	Work on Receiver declaration in support of Minden sale motion, notice of motion and proposed order (.9) discuss same with Receiver and G. Rodriguez (.3)	Fates, Edward (Ted)	1.20	621.00	11,617.10	WO	HD	TR	_____
02/25/21	8360026	Call/emails with Receiver and G. Rodriguez re: bid procedures and approach for Washoe III zoom auction (.4) communications with counsel for overbidder (.3)	Fates, Edward (Ted)	0.70	362.25	11,979.35	WO	HD	TR	_____

05/28/21 19:44:06 PROFORMA STATEMENT FOR MATTER 372640.00005 (Thomas C. Hebrank, as Receiver for Weste) (Operations &amp; Asset Sales)

**Fees for Matter 372640.00005.(Operations & Asset Sales)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action		
02/26/21	8360851	Attend auction for Washoe III property (.4) advise on amendments to purchase and sale agreements for winning bidder and back-up bidder (.2)	Fates, Edward (Ted)	0.60	310.50	12,289.85	WO	HD	TR
03/01/21	8367221	Review status of Washoe III sale and related correspondence and purchase and sale agreement drafts.	Lorenzen, Jonathan	0.20	81.90	12,371.75	WO	HD	TR
03/01/21	8389917	Advise on issues re: amendments to purchase and sale agreements for winning bidder and back up bidder from Washoe III auction	Fates, Edward (Ted)	0.40	207.00	12,578.75	WO	HD	TR
03/01/21	8395684	Begin drafting the Highest Bidder and Backup Bidder amendments to the applicable purchase and sale agreements for the Washoe III property.	Thiels, Megan	1.70	697.00	13,275.75	WO	HD	TR
03/02/21	8389929	Work on notice of results of auction of Washoe III and amended proposed order approving sale to winning bidder (.8) communications with G. Rodriguez re: PSA amendments and escrow issues (.4)	Fates, Edward (Ted)	1.20	621.00	13,896.75	WO	HD	TR
03/04/21	8369515	Revise and finalize notice of results of auction and amended proposed order for Washoe III sale	Fates, Edward (Ted)	0.40	207.00	14,103.75	WO	HD	TR
03/08/21	8372342	Advise Receiver and G. Rodriguez re: order approving Washoe III sale	Fates, Edward (Ted)	0.20	103.50	14,207.25	WO	HD	TR
03/10/21	8375452	Communications with counsel for buyer, title company and G. Rodriguez re: Washoe III closing issues	Fates, Edward (Ted)	0.50	258.75	14,466.00	WO	HD	TR

05/28/21 19:44:06 PROFORMA STATEMENT FOR MATTER 372640.00005 (Thomas C. Hebrank, as Receiver for Weste) (Operations &amp; Asset Sales)

**Fees for Matter 372640.00005.(Operations & Asset Sales)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
03/22/21	8385773	Communications with G. Rodriguez re: lack of overbids for Minden sale (.1) work on notice re: same (.2)	Fates, Edward (Ted)	0.30	155.25	14,621.25	WO	HD	TR
03/23/21	8387865	Review order approving sale of 79-acre portion of Minden property and advise Receiver re: same	Fates, Edward (Ted)	0.20	103.50	14,724.75	WO	HD	TR

**Proforma Summary****Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	19.90	517.50	10,298.25
002115	Lorenzen, Jonathan	3.00	409.50	1,228.50
002306	Thiels, Megan	7.80	410.00	3,198.00
		30.70		\$14,724.75
Subtotal Fees				\$14,724.75
Discount				0.00
Total Fees				14,724.75
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

EXPIRES 6/30/2021: 7/2016 rates less 10% DISCOUNT ON FEES (rated code 10)- AUTOMATIC; copies @ .05; no text editing

**Account Summary – As Of 06/01/21**

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

05/28/21 19:44:06 PROFORMA STATEMENT FOR MATTER 372640.00005 (Thomas C. Hebrank, as Receiver for Weste) (Operations &amp; Asset Sales)

Worked	34,833.35	34,833.35	0.00	14,724.75	14,724.75	0.00	14,724.75	14,724.75	0.00
Unbilled Adj	1.37	1.37	0.00	0.00	0.00	0.00	38.40	38.40	0.00
Billed	35,614.32	35,614.32	0.00	20,109.21	20,109.21	0.00	470,103.48	470,103.48	0.00
Collected	35,614.32	35,614.32	0.00	32,565.57	32,565.57	0.00	470,103.48	470,103.48	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>14,724.75</b>	<b>14,724.75</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

---

**Billing Address**

---

Thomas C. Hebrank, as Receiver for Western Financial  
c/o E3 Advisors  
501 West Broadway, Suite 800  
San Diego, CA 92101

---

}

05/28/21 19:44:11 PROFORMA STATEMENT FOR MATTER 372640.00006 (Thomas C. Hebrank, as Receiver for Weste) (Claims & Distributions)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward  
(Ted)

Matter #: 372640.00006

Client Name: Thomas C. Hebrank, as Receiver for Weste

Date of Last Billing: 04/26/21

Matter Name: Claims & Distributions

Proforma Number: 1094658

Client/Matter Joint Group # 372640-1

**Fees for Matter 372640.00006.(Claims & Distributions)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/07/21	8313337	Revisions to case update to investors, communications with Receiver and G. Rodriguez re: same	Fates, Edward (Ted)	0.40	207.00	207.00	WO	HD	TR
01/12/21	8316584	Respond to inquiry from investor re: final distributions	Fates, Edward (Ted)	0.10	51.75	258.75	WO	HD	TR
01/20/21	8322950	Respond to inquiry from investor re: final distributions	Fates, Edward (Ted)	0.20	103.50	362.25	WO	HD	TR
03/22/21	8385528	Call from investor re: timing of final distributions	Fates, Edward (Ted)	0.20	103.50	465.75	WO	HD	TR
04/08/21	8405668	Analyze legal steps remaining to make final distribution and wrap up receivership	Fates, Edward (Ted)	0.30	155.25	621.00	WO	HD	TR
04/14/21	8410952	Call/emails with Receiver and G. Rodriguez re: process for making final distributions and closing up receivership, outstanding issues to be resolved	Fates, Edward (Ted)	0.90	465.75	1,086.75	WO	HD	TR

05/28/21 19:44:11 PROFORMA STATEMENT FOR MATTER 372640.00006 (Thomas C. Hebrank, as Receiver for Weste) (Claims &amp; Distributions)

**Fees for Matter 372640.00006.(Claims & Distributions)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>	
04/15/21	8412545	Revisions to monthly case update (.3) communications with Receiver re: same (.1)	Fates, Edward (Ted)	0.40	207.00	1,293.75	WO	HD	TR
04/27/21	8426012	Work on motion to make final distribution, destroy entity documents and conclude receivership	Fates, Edward (Ted)	1.70	879.75	2,173.50	WO	HD	TR
04/28/21	8424892	Work on motion to make final distribution, destroy entity documents and conclude receivership (2.3) discuss same with Receiver (.3) respond to investor inquiry re: final distributions (.2)	Fates, Edward (Ted)	2.80	1,449.00	3,622.50	WO	HD	TR
05/17/21	8445339	Communications with Receiver re: motion to make final distributions and wrap up receivership	Fates, Edward (Ted)	0.20	103.50	3,726.00	WO	HD	TR
05/21/21	8450450	Respond to investor correspondence re: final distributions	Fates, Edward (Ted)	0.20	103.50	3,829.50	WO	HD	TR
05/24/21	8452200	Discuss revisions to motion to make final distribution and close receivership and timing issues with distributions and final tax returns with Receiver	Fates, Edward (Ted)	0.70	362.25	4,191.75	WO	HD	TR

**Proforma Summary**

<b>Timekeeper Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
001665	Fates, Edward (Ted)	8.10	517.50	4,191.75
		8.10		\$4,191.75
Subtotal Fees				\$4,191.75
Discount				0.00
Total Fees				4,191.75
Total Disbursements				0.00

05/28/21 19:44:11 PROFORMA STATEMENT FOR MATTER 372640.00006 (Thomas C. Hebrank, as Receiver for Weste) (Claims &amp; Distributions)

**Attorney Billing Instructions**

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

**Billing Instructions**

EXPIRES 6/30/2021: 7/2016 rates less 10% DISCOUNT ON FEES (rated code 10)- AUTOMATIC; copies @ .05; no text editing

**Account Summary – As Of 06/01/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	5,019.75	5,019.75	0.00	4,191.75	4,191.75	0.00	4,191.75	4,191.75	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	8.45	8.45	0.00
Billed	1,914.75	1,914.75	0.00	828.00	828.00	0.00	188,635.60	188,635.60	0.00
Collected	1,914.75	1,914.75	0.00	1,345.50	1,345.50	0.00	188,635.60	188,635.60	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>Total</b>	<b>4,191.75</b>	<b>4,191.75</b>	<b>0.00</b>						
<b>WIP Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc Payment</b>	<b>0.00</b>								
<b>Client Trust Balance</b>	<b>0.00</b>								

**Billing Address**

Thomas C. Hebrank, as Receiver for Western Financial  
 c/o E3 Advisors  
 501 West Broadway, Suite 800  
 San Diego, CA 92101

}

05/28/21 19:44:15 PROFORMA STATEMENT FOR MATTER 372640.00009 (Thomas C. Hebrank, as Receiver for Weste) (Employment/Fees)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward  
(Ted)

Matter #: 372640.00009

Client Name: Thomas C. Hebrank, as Receiver for Weste

Date of Last Billing: 04/26/21  
Proforma Number: 1094658

Matter Name: Employment/Fees

Client/Matter Joint Group # 372640-1

**Fees for Matter 372640.00009.(Employment/Fees)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/08/21	8315214	Meet and confer communications with SEC counsel (.1) finalize Receiver's 33rd fee application (.2)	Fates, Edward (Ted)	0.30	155.25	155.25	WO	HD	TR
03/18/21	8382933	Meet and confer communications with SEC re: interim fee applications (.1) revise and finalize Receiver's 34th interim fee application (.3)	Fates, Edward (Ted)	0.40	207.00	362.25	WO	HD	TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.70	517.50	362.25
		0.70		\$362.25
Subtotal Fees				\$362.25
Discount				0.00
Total Fees				362.25
Total Disbursements				0.00

**Attorney Billing Instructions**



05/28/21 19:44:15 PROFORMA STATEMENT FOR MATTER 372640.00009 (Thomas C. Hebrank, as Receiver for Weste) (Employment/Fees)

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

**Billing Instructions**

EXPIRES 6/30/2021: 7/2016 rates less 10% DISCOUNT ON FEES (rated code 10)- AUTOMATIC; copies @ .05; no text editing

**Account Summary – As Of 06/01/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,345.50	1,345.50	0.00	362.25	362.25	0.00	362.25	362.25	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.79	0.79	0.00
Billed	2,742.75	2,742.75	0.00	983.25	983.25	0.00	40,454.84	40,454.84	0.00
Collected	2,742.75	2,742.75	0.00	2,121.75	2,121.75	0.00	40,454.84	40,454.84	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>Balance</b>	<b>362.25</b>	<b>362.25</b>	<b>0.00</b>						
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

Thomas C. Hebrank, as Receiver for Western Financial  
c/o E3 Advisors  
501 West Broadway, Suite 800  
San Diego, CA 92101