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

**THIRTIETH INTERIM FEE
APPLICATION OF ALLEN
MATKINS LECK GAMBLE
MALLORY & NATSIS LLP,
COUNSEL TO RECEIVER**

Date: June 5, 2020
Time: 1:30 p.m.
Ctrm.: 2D
Judge: Hon. Gonzalo P. Curiel

Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), counsel for Thomas C. Hebrank ("Receiver"), Court-appointed receiver for First Financial Planning Corporation d/b/a Western Financial Planning Corporation ("Western"), and its subsidiaries and the General Partnerships listed in Schedule 1 to the Preliminary Injunction Order entered on March 13, 2013 (collectively, "Receivership Entities"), hereby submits this Thirtieth Interim Application for payment of professional fees and reimbursement of costs for the time period October 1, 2019, through December 31, 2019 ("Thirtieth Application Period"). Allen Matkins incurred \$4,083.75 in fees and \$171.38 in costs during the three-month period and seeks interim approval and payment of 80% of fees incurred, or \$3,267.00, and 100% of costs incurred. As it has throughout the case, Allen Matkins has discounted its customary hourly rates by 10%.

I. FEE APPLICATION SUMMARY

During the Thirtieth Application Period, Allen Matkins provided a total of 8.90 hours of service for a total of \$4,083.75 in fees. Allen Matkins requests payment on an interim basis of 80% of this amount, or \$3,267.00. The firm has provided its services in the following categories, as discussed in further detail below and as set forth task-by-task in Exhibit A:

Category	Hours	Total
General Receivership	2.60	\$823.50
Reporting	2.40	\$1,242.00
Operations and Asset Sales	1.00	\$517.50
Claims and Distributions	1.70	\$879.75
Third Party Recoveries	0.40	\$207.00
Employment/Fees	0.80	\$414.00
Total Fees	8.90	\$4,083.75

II. TASKS PERFORMED

During the Thirtieth Application Period, Allen Matkins worked diligently to assist the Receiver with legal issues affecting the receivership. The following is a discussion of Allen Matkins' work, broken down by the categories listed above.

A. General Receivership

This category includes time spent addressing a notice from the San Diego County Probation Department that WFP Receivership had potentially been the victim of an identity theft-related crime. Allen Matkins looked into the matter at the Receiver's request to gather more information. The reasonable and necessary fees for work in this category total \$823.50.

B. Reporting

This category includes time spent preparing the Receiver's Twenty-Ninth Interim Report filed on November 20, 2019. Dkt. No. 1748. The report includes detailed updates regarding enforcement of judgments against the LinMar entities, 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 \$1,242.00.

C. Operations and Asset Sales

Allen Matkins' time in this category focused on sales of receivership properties via the Modified Orderly Sale Process. The receivership properties to which this work pertained during the Thirtieth Application Period include the Yuma properties and Washoe III. The reasonable and necessary fees for Allen Matkins' work in this category total \$517.50.

D. Claims and Distributions

Allen Matkins assisted in addressing unique issues with investor distributions, preparing monthly case updates to investors, and responding to several direct inquiries from investors or their counsel regarding distributions. The reasonable and necessary fees for this work total \$879.75.

1 **E. Third Party Recoveries**

2 Allen Matkins' work in this category focused on recovery on the judgment
3 against LinMar III. During the prior application period, Allen Matkins assisted the
4 Receiver in preparing a motion to close the post-judgment receivership (which was
5 filed in the related case against LinMar III, Case No. 13-cv-2180-GPC-LL). The
6 Receiver's motion was filed on July 3, 2019 and granted on October 25, 2019.

7 During this Application Period, Allen Matkins advised the Receiver
8 regarding the order and communicated with the post-judgment receiver regarding
9 disbursement of the remaining funds to the Receiver. The reasonable and
10 necessary fees for work in this category total \$207.00.

11 **F. Employment/Fees**

12 Although fee applications are a necessary component of federal equity
13 receiverships, neither the Receiver nor his professionals bill time for preparing their
14 own detailed applications. Allen Matkins assisted the Receiver in preparing his
15 Twenty-Eighth Interim Fee Application, which was filed on October 23, 2019.
16 Dkt. 1743. The reasonable and necessary fees for this work total \$414.00.

17 **G. Summary of Costs Requested**

18 Allen Matkins requests the Court approve reimbursement of \$171.38 for out-
19 of-pocket costs incurred in executing the foregoing tasks, as itemized in Exhibit A.
20 Pursuant to the Court's Order Granting in Part First Fee Applications, Allen
21 Matkins has reduced its request for reimbursement of copy costs to five cents per
22 page and written off any excess copy charges incurred.

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

24 From inception of the receivership through December 31, 2019, the Receiver
25 incurred fees and costs of \$2,426,486.84, of which amount \$476,300.61 is subject
26 to holdback pending approval of the Receiver's final fee application at the
27 conclusion of the receivership, \$18,319.37 is awaiting the Court's review and
28 approval, and \$1,935,478.11 has been approved by the Court and paid to date.

1 During the same time period, Allen Matkins has incurred fees and costs of
 2 \$1,814,390.63, of which amount \$370,924.42 is subject to holdback pending
 3 approval of the Allen Matkins' final fee application at the conclusion of the
 4 receivership, \$4,255.13 is awaiting the Court's review and approval, and
 5 \$1,440,027.83 has been approved by the Court and paid to date. Finally, during the
 6 same time period, tax accountant Duffy Kruspodin & Company, LLP ("Duffy") has
 7 incurred fees and costs totaling \$982,620.17, \$972,104.93 of which has been paid
 8 to date, and \$10,515.24 of which is awaiting the Court's review and approval.

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

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

18 **A. Complexity of Tasks**

19 Here, the tasks performed by Allen Matkins are significantly complex and
 20 the number of hours billed to complete them are reasonable. These tasks include
 21 (a) advising the Receiver regarding federal equity receivership, debtor/creditor
 22 rights, real property, contract, insurance, tax, civil procedure, judgment
 23 enforcement and other applicable areas of law, and (b) assisting the Receiver in
 24 selling assets, (c) assisting the Receiver in distributing receivership assets in a
 25 manner that treats investors fairly and equitably, and (d) providing detailed reports
 26 to the Court and interested parties.

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1 **B. Fair Value of Time, Labor & Skill**

2 The Court has previously determined on multiple occasions, including on
3 April 10, 2017, that the discounted hourly rates of Allen Matkins represent the fair
4 value of their time, labor, and skill. Dkt. No. 1460. Accordingly, Allen Matkins'
5 discounted hourly rates continue to represent the fair value of its time, labor, and
6 skill. In addition, Allen Matkins wrote off and did not charge for 2.5 hours of time
7 during the Thirtieth Application Period (\$1,293.75).

8 **C. Quality of Work Performed**

9 Allen Matkins has diligently and competently assisted the Receiver in all
10 aspects of the receivership, including preserving and protecting the assets of the
11 Receivership Entities, analyzing the Receivership Entities' assets and liabilities,
12 addressing Western's cash shortage, reducing Western's operating expenses as well
13 as administrative expenses of the receivership, selling assets and collecting loans,
14 protecting the Receivership Entities' interests in pending litigation and other legal
15 matters, preserving and pursuing causes of action against third parties, formulating
16 plans and procedures for the determination of investor claims and the fair and
17 equitable distribution of receivership estate assets, and preparing detailed reports to
18 the Court and interested parties. These services have allowed the Receiver to
19 preserve and protect the value of the Receivership Entities' assets for the benefit of
20 investors.

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

22 Pursuant to the Court's May 25, 2016 Order (Dkt. No. 1304), the assets of the
23 Receivership Entities (Western and the GPs) have been pooled, creating a common
24 pool of receivership estate cash from which mortgages, property taxes, and other
25 operating expenses have been and will continue to be paid. The cash balance has
26 grown and will continue to grow as properties are sold through the Court-approved
27 Modified Orderly Sale Process (Dkt. Nos. 1309, 1359). As a result of sales closed
28

1 as of December 31, 2019, and factoring in interim distributions that had been
 2 cashed as of that date, the receivership estate held approximately \$3.48 million.

3 As noted above, on June 17, 2019, the Court approved a second interim
 4 distribution to investors with allowed claims in the total amount of \$6 million. As
 5 part of the Receiver's motion, a reserve sufficient to pay the ongoing fees and costs
 6 of the receivership was maintained. Therefore, the receivership estate has the
 7 ability to pay the fees and costs requested herein.

8 **E. Commission's Opposition or Acquiescence**

9 Prior to filing, the Receiver and Allen Matkins provided these fee
 10 applications to counsel for the Commission in substantially final form. Counsel for
 11 the Commission has advised that the Commission has no opposition to the fees and
 12 costs requested.

13 Accordingly, the five factors identified by the Court for considering interim
 14 fee applications all support interim approval and payment of the requested fees and
 15 costs.

16 **V. CONCLUSION**

17 WHEREFORE, the Receiver and Allen Matkins respectfully request entry of
 18 an order:

- 19 1. Approving payment of fees to Allen Matkins on an interim basis of
 20 \$3,267.00;
- 21 2. Approving reimbursement of expenses to Allen Matkins on an interim
 22 basis of \$171.38;
- 23 3. Authorizing and directing the Receiver to pay these amounts to Allen
 24 Matkins from assets of the Receivership Entities; and

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1 4. Granting such further and other relief as the Court deems just and
2 proper.

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4 Dated: April 17, 2020

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

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6 By: /s/ Edward Fates

7 EDWARD G. FATES
8 Attorneys for Receiver
9 THOMAS C. HEBRANK
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EXHIBIT INDEX

Exhibit A	Detailed Time Reports	10
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EXHIBIT A

EXHIBIT A

02/19/20 11:42:05 PROFORMA STATEMENT FOR MATTER 372640-00002 (Thomas C. Hebrank, as Receiver for Western Financial) (General Receivership)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 372640-00002

Matter Name: General Receivership

Date of Last Billing: 01-29-2020

Client Name: Thomas C. Hebrank, as Receiver for Western Financial

Proforma Number 1456165

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
12/16/19	8056884	Research regarding criminal case involving Andrea Bejaran and Western Financial.	Kaup, John	0.3	76.95	76.95	WO HD TR_____
12/16/19	8055619	Analyze issues regarding notice of A. Bejaran criminal conviction and victim compensation, communications with G. Rodriguez regarding same.	Fates, Edward (Ted)	0.4	207.00	283.95	WO HD TR_____
12/17/19	8062606	Forward materials regarding criminal file for Andrea Bejaran.	Kaup, John	0.1	25.65	309.60	WO HD TR_____
12/18/19	8063007	Research regarding Bejaran criminal case and circumstances around notice to receivership.	Kaup, John	1.5	384.75	694.35	WO HD TR_____
12/18/19	8058442	Advise on issues related to A. Bejaran criminal conviction and victim compensation notice.	Fates, Edward (Ted)	0.2	103.50	797.85	WO HD TR_____
12/19/19	8063040	Telephone call to Attorney Joseph Hallare regarding criminal case of Andre Bejaran.	Kaup, John	0.1	25.65	823.50	WO HD TR_____

Disbursements for Matter 372640-00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	Circle	Action
10/24/19	2579661	Messenger - - Nationwide Legal, LLC, USDC, Southern District, ^13002	1.00	22.00	WO	HD TR_____
11/13/19	2577084	Messenger -- Federal Express Invoice No: 684591885 1665 Ship To: Tiffany Quarles	1.00	14.88	WO	HD TR_____
11/13/19	2579391	Document Research - - Nationwide Legal, LLC, USDC/SOUTHERN DISTRICT OF CALIFORNIA, OBTAIN A CERTIFIED COY OF THE ATTACHED ORDER^13445	1.00	69.50	WO	HD TR_____
12/17/19	2595655	Document Research - - Nationwide Legal, LLC, Please obtain a copy of the criminal file, case number SCN403775, filed 8/20/2019, Defendant Andrea Foster Bejaran.^14360	1.00	65.00	WO	HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000820	John Kaup	2.0	256.50	513.00
001665	Edward (Ted) Fates	0.6	517.50	310.50
		2.6		823.50
Total Fees				823.50
Total Disbursements				171.38

Attorney Billing Instructions

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

Billing Instructions

EXPIRES 6/30/2020: 7/2016 rates less 10% DISCOUNT ON FEES (rated code 10)- AUTOMATIC; copies @ .05; no text editing

Account Summary- As Of 12/31/2019

Fiscal YTD

Calendar YTD

LTD

	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	65,725.30	56,138.19	9,587.11	3,190.20	2,803.04	387.16	431,133.65	393,163.22	37,970.43
Unbilled Adj	(1,073.06)	0.41	(1,073.47)	0.00	0.00	0.00	(7,769.74)	(65.05)	(7,704.69)
Billed	138,583.75	128,978.30	9,605.45	1,131.76	1,035.00	96.76	422,369.03	392,274.67	30,094.36
Collected	138,583.75	128,978.30	9,605.45	1,131.76	1,035.00	96.76	422,369.03	392,274.67	30,094.36
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Cost						
WIP Balance	1,098.98	823.50	275.48						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

02/19/20 11:42:05 PROFORMA STATEMENT FOR MATTER 372640-00004 (Thomas C. Hebrank, as Receiver for Western Financial) (Reporting)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 372640-00004

Matter Name: Reporting

Date of Last Billing: 01-29-2020

Client Name: Thomas C. Hebrank, as Receiver for Western Financial

Proforma Number 1456166

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
11/12/19	8020912	Work on 29th interim report (1.4); communications with Receiver and G. Rodriguez regarding same (.2).	Fates, Edward (Ted)	1.6	828.00	828.00	WO HD TR _____
11/15/19	8025875	Revisions to Receiver's 29th interim report, discuss same with G. Rodriguez.	Fates, Edward (Ted)	0.4	207.00	1,035.00	WO HD TR _____
11/19/19	8028753	Revise and finalize Receiver's 29th interim report and exhibits.	Fates, Edward (Ted)	0.4	207.00	1,242.00	WO HD TR _____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward (Ted) Fates	2.4	517.50	1,242.00
		2.4		1,242.00
Total Fees				1,242.00
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

EXPIRES 6/30/2020: 7/2016 rates less 10% DISCOUNT ON FEES (rated code 10)- AUTOMATIC; copies @ .05; no text editing

Account Summary- As Of 12/31/2019

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	15,628.50	15,628.50	0.00	4,088.25	4,088.25	0.00	165,810.95	165,419.10	391.85
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	(6.83)	5.69	(12.52)
Billed	27,316.35	27,316.35	0.00	1,449.00	1,449.00	0.00	164,562.12	164,182.79	379.33
Collected	27,316.35	27,316.35	0.00	1,449.00	1,449.00	0.00	164,562.12	164,182.79	379.33
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Cost						
WIP Balance	2,794.50	2,794.50	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

02/19/20 11:42:05 PROFORMA STATEMENT FOR MATTER 372640-00005 (Thomas C. Hebrank, as Receiver for Western Financial) (Operations & Asset Sales)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 372640-00005

Matter Name: Operations & Asset Sales

Date of Last Billing: 01-29-2020

Client Name: Thomas C. Hebrank, as Receiver for Western Financial

Proforma Number 1456167

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
11/13/19	8022327	Review and advise Receiver and G. Rodriguez regarding order approving sale of Yuma properties.	Fates, Edward (Ted)	0.2	103.50	103.50	WO HD TR_____
11/18/19	8027006	Revisions to notice to investors regarding offer on Washoe III property.	Fates, Edward (Ted)	0.3	155.25	258.75	WO HD TR_____
11/22/19	8031790	Advise G, Rodriguez regarding response to request from buyer of Stead 1 property regarding water rights (.3); discuss strategy and timing re sales of remaining properties with Receiver(.2).	Fates, Edward (Ted)	0.5	258.75	517.50	WO HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward (Ted) Fates	1.0	517.50	517.50
		1.0		517.50
Total Fees				517.50
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

EXPIRES 6/30/2020: 7/2016 rates less 10% DISCOUNT ON FEES (rated code 10)- AUTOMATIC; copies @ .05; no text editing

Account Summary- As Of 12/31/2019

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	129,827.69	129,651.69	176.00	18,940.54	18,940.54	0.00	433,274.09	433,047.09	227.00
Unbilled Adj	(174.63)	1.37	(176.00)	0.00	0.00	0.00	(210.98)	16.02	(227.00)
Billed	207,316.32	207,316.32	0.00	9,742.49	9,742.49	0.00	432,545.61	432,545.61	0.00
Collected	207,316.32	207,316.32	0.00	9,742.49	9,742.49	0.00	432,545.61	432,545.61	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Cost						
WIP Balance	8,316.90	8,316.90	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

02/19/20 11:42:05 PROFORMA STATEMENT FOR MATTER 372640-00006 (Thomas C. Hebrank, as Receiver for Western Financial) (Claims & Distributions)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 372640-00006

Matter Name: Claims & Distributions

Date of Last Billing: 01-29-2020

Client Name: Thomas C. Hebrank, as Receiver for Western Financial

Proforma Number 1456168

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
10/11/19	7987436	Revisions to monthly case update to investors.	Fates, Edward (Ted)	0.3	155.25	155.25	WO HD TR_____
11/15/19	8025684	Revisions to monthly case update to investors, communications with G. Rodriguez regarding same.	Fates, Edward (Ted)	0.3	155.25	310.50	WO HD TR_____
11/27/19	8035968	Analyze issues raised in correspondence from G. Aguirre, advise Receiver regarding same (.3); prepare response to same (.3).	Fates, Edward (Ted)	0.6	310.50	621.00	WO HD TR_____
12/03/19	8042139	Revisions to notice to investors regarding status of remaining properties for sale.	Fates, Edward (Ted)	0.3	155.25	776.25	WO HD TR_____
12/17/19	8056358	Respond to direct investor inquiry regarding distributions.	Fates, Edward (Ted)	0.2	103.50	879.75	WO HD TR_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward (Ted) Fates	1.7	517.50	879.75
		1.7		879.75
Total Fees				879.75
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

EXPIRES 6/30/2020: 7/2016 rates less 10% DISCOUNT ON FEES (rated code 10)- AUTOMATIC; copies @ .05; no text editing

Account Summary- As Of 12/31/2019

Fiscal YTD				Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	54,964.80	54,964.80	0.00	7,296.75	7,296.75	0.00	184,911.75	184,911.75	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	(2.15)	(2.15)	0.00
Billed	60,601.50	60,601.50	0.00	3,881.25	3,881.25	0.00	184,029.85	184,029.85	0.00
Collected	60,601.50	60,601.50	0.00	3,881.25	3,881.25	0.00	184,029.85	184,029.85	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP Balance	2,898.00	2,898.00	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

02/19/20 11:42:05 PROFORMA STATEMENT FOR MATTER 372640-00007 (Thomas C. Hebrank, as Receiver for Western Financial) (Third Party Recoveries)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 372640-00007

Matter Name: Third Party Recoveries

Date of Last Billing: 01-29-2020

Client Name: Thomas C. Hebrank, as Receiver for Western Financial

Proforma Number 1456169

Client/Matter Joint Group # 372640-1

Fees for Matter 372640-00007 (Third Party Recoveries)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
10/25/19	7999939	Analyze order on motion regarding distribution of disputed funds and closure of post-judgment receivership (.2); communications with Receiver, J. Lowe, and counsel for SEC regarding same (.2).	Fates, Edward (Ted)	0.4	207.00	207.00	WO HD TR _____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward (Ted) Fates	0.4	517.50	207.00
		0.4		207.00
Total Fees				207.00
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

EXPIRES 6/30/2020: 7/2016 rates less 10% DISCOUNT ON FEES (rated code 10)- AUTOMATIC; copies @ .05; no text editing

Account Summary- As Of 12/31/2019

Fiscal YTD				Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	33,443.94	33,443.94	0.00	13,092.75	13,092.75	0.00	166,469.34	166,469.34	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	(2.80)	(2.80)	0.00
Billed	14,908.44	14,908.44	0.00	11,229.75	11,229.75	0.00	166,259.54	166,259.54	0.00
Collected	14,908.44	14,908.44	0.00	11,229.75	11,229.75	0.00	166,259.54	166,259.54	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>WIP Balance</i>	<i>7,926.75</i>	<i>7,926.75</i>	<i>0.00</i>						
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>						
<i>Unalloc Payment</i>	<i>0.00</i>								
<i>Client Trust Balance</i>	<i>0.00</i>								

Billing Address

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

02/19/20 11:42:05 PROFORMA STATEMENT FOR MATTER 372640-00009 (Thomas C. Hebrank, as Receiver for Western Financial)
(Employment/Fees)

Preliminary Billing Form

Billing Atty: 001665 - Edward Fates

Matter #: 372640-00009

Matter Name: Employment/Fees

Date of Last Billing: 01-29-2020

Client Name: Thomas C. Hebrank, as Receiver for Western Financial

Proforma Number 1456170

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
10/21/19	7994437	Revisions to Receiver's 28th interim fee application (.6); meet and confer communications with counsel for SEC (.2).	Fates, Edward (Ted)	0.8	414.00	414.00	WO HD TR _____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward (Ted) Fates	0.8	517.50	414.00
		0.8		414.00
Total Fees				414.00
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

EXPIRES 6/30/2020: 7/2016 rates less 10% DISCOUNT ON FEES (rated code 10)- AUTOMATIC; copies @ .05;
no text editing

Account Summary- As Of 12/31/2019

Fiscal YTD				Calendar YTD			LTD		
	Total	Fees	Disbursement	Total	Fees	Disbursement	Total	Fees	Disbursement
Worked	13,248.00	13,248.00	0.00	2,173.50	2,173.50	0.00	37,187.10	37,187.10	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	(44.26)	(44.26)	0.00
Billed	14,231.25	14,231.25	0.00	1,293.75	1,293.75	0.00	36,728.84	36,728.84	0.00
Collected	14,231.25	14,231.25	0.00	1,293.75	1,293.75	0.00	36,728.84	36,728.84	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>WIP Balance</i>	<i>1,604.25</i>	<i>1,604.25</i>	<i>0.00</i>						
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>						
<i>Unalloc Payment</i>	<i>0.00</i>								
<i>Client Trust Balance</i>	<i>0.00</i>								

Billing Address

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