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5 ALLEN MATKINS LECK GAMBLE
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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.
22

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

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

Date: August 28, 2020
Time: 1:30 p.m.
Ctrm.: 2D
Judge: Hon. Gonzalo P. Curiel

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 Thirtieth Interim Application for
 7 payment of professional fees and reimbursement of costs for the time period
 8 January 1, 2020, through March 31, 2020 ("Thirty-First Application Period").
 9 Allen Matkins incurred \$7,110.00 in fees and \$18.00 in costs during the three-
 10 month period and seeks interim approval and payment of 80% of fees incurred, or
 11 \$5,688.00, and 100% of costs incurred. As it has throughout the case, Allen
 12 Matkins has discounted its customary hourly rates by 10%.

13 I. FEE APPLICATION SUMMARY

14 During the Thirty-First Application Period, Allen Matkins provided a total of
 15 16.20 hours of service for a total of \$7,110.00 in fees. Allen Matkins requests
 16 payment on an interim basis of 80% of this amount, or \$5,688.00. The firm has
 17 provided its services in the following categories, as discussed in further detail
 18 below and as set forth task-by-task in Exhibit A:

19 Category	Hours	Total
20 General Receivership	0.20	\$103.50
21 Reporting	2.60	\$1,345.50
22 Operations and Asset Sales	11.10	\$4,470.75
23 Claims and Distributions	1.10	\$569.25
24 Employment/Fees	1.20	\$621.00
Total Fees	16.20	\$7,110.00

25 II. TASKS PERFORMED

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

1 **A. General Receivership**

2 Allen Matkins' time in this category was for advice provided to the Receiver
3 regarding a claim asserted by the Franchise Tax Board. The reasonable and
4 necessary fees for work in this category total \$103.50.

5 **B. Reporting**

6 This category includes time spent preparing the Receiver's Thirtieth Interim
7 Report filed on March 31, 2020. Dkt. No. 1757. The report includes detailed
8 updates regarding closed and pending sales of properties, and receipts and
9 disbursements for the receivership estate. The reasonable and necessary fees for
10 work in this category total \$1,345.50.

11 **C. Operations and Asset Sales**

12 Allen Matkins' time in this category focused on sales of receivership
13 properties via the Modified Orderly Sale Process. During the Thirty-First
14 Application Period, this work focused on the Minden and Silver Springs properties.
15 The reasonable and necessary fees for Allen Matkins' work in this category total
16 \$4,470.75.

17 **D. Claims and Distributions**

18 Allen Matkins assisted in addressing unique issues with investor
19 distributions, preparing monthly case updates to investors, and responding to
20 several direct inquiries from investors or their counsel regarding distributions. The
21 reasonable and necessary fees for this work total \$569.25.

22 **E. Employment/Fees**

23 Although fee applications are a necessary component of federal equity
24 receiverships, neither the Receiver nor his professionals bill time for preparing their
25 own detailed applications. Allen Matkins assisted the Receiver in preparing his
26 Thirtieth Fee Application, which was filed on April 17, 2020. Dkt. 1758. The
27 reasonable and necessary fees for this work total \$621.00.

28

1 **F. Summary of Costs Requested**

2 Allen Matkins requests the Court approve reimbursement of \$18.00 for out-
3 of-pocket costs incurred in executing the foregoing tasks, as itemized in Exhibit A.
4 Pursuant to the Court's Order Granting in Part First Fee Applications, Allen
5 Matkins has reduced its request for reimbursement of copy costs to five cents per
6 page and written off any excess copy charges incurred.

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

8 From inception of the receivership through March 31, 2020, the Receiver
9 incurred fees and costs of \$2,440,935.14, of which amount \$479,175.21 is subject
10 to holdback pending approval of the Receiver's final fee application at the
11 conclusion of the receivership, \$14,448.30 is awaiting the Court's review and
12 approval, and \$1,950,186.23 has been approved by the Court and paid to date.
13 During the same time period, Allen Matkins has incurred fees and costs of
14 \$1,821,518.63, of which amount \$372,346.42 is subject to holdback pending
15 approval of the Allen Matkins' final fee application at the conclusion of the
16 receivership, \$7,128.00 is awaiting the Court's review and approval, and
17 \$1,443,466.21 has been approved by the Court and paid to date. Finally, during the
18 same time period, tax accountant Duffy Kruspodin & Company, LLP ("Duffy") has
19 incurred fees and costs totaling \$972,104.93, all of which has been paid to date for
20 preparing tax returns for Western, GP, and other non-GP Receivership Entities.

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

22 In its Order Granting in Part First Interim Fee Applications ("First Fee
23 Order"), the Court analyzed the case law regarding approval of interim fee
24 applications in regulatory receiverships and determined the following factors
25 should be considered: (1) the complexity of the receiver's tasks; (2) the fair value
26 of the time, labor, and skill measured by conservative business standards; (3) the
27 quality of work performed, including the results obtained and the benefit to the
28

1 receivership estate; (4) the burden the receivership estate may safely be able to
2 bear; and (5) the Commission's opposition or acquiescence. Dkt. No. 169, p. 7.

3 **A. Complexity of Tasks**

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

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

13 The Court has previously determined on multiple occasions that the
14 discounted hourly rates of Allen Matkins represent the fair value of their time,
15 labor, and skill. Accordingly, Allen Matkins' discounted hourly rates continue to
16 represent the fair value of its time, labor, and skill. In addition, Allen Matkins
17 wrote off and did not charge for 2.5 hours of time during the Thirty-First
18 Application Period (\$1,293.75).

19 **C. Quality of Work Performed**

20 Allen Matkins has diligently and competently assisted the Receiver in all
21 aspects of the receivership, including preserving and protecting the assets of the
22 Receivership Entities, analyzing the Receivership Entities' assets and liabilities,
23 addressing Western's cash shortage, reducing Western's operating expenses as well
24 as administrative expenses of the receivership, selling assets and collecting loans,
25 protecting the Receivership Entities' interests in pending litigation and other legal
26 matters, preserving and pursuing causes of action against third parties, formulating
27 plans and procedures for the determination of investor claims and the fair and
28 equitable distribution of receivership estate assets, and preparing detailed reports to

1 the Court and interested parties. These services have allowed the Receiver to
2 preserve and protect the value of the Receivership Entities' assets for the benefit of
3 investors.

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

5 Pursuant to the Court's May 25, 2016 Order (Dkt. No. 1304), the assets of the
6 Receivership Entities (Western and the GPs) have been pooled, creating a common
7 pool of receivership estate cash from which mortgages, property taxes, and other
8 operating expenses have been and will continue to be paid. The cash balance has
9 grown and will continue to grow as properties are sold through the Court-approved
10 Modified Orderly Sale Process (Dkt. Nos. 1309, 1359). As a result of sales closed
11 as of March 31, 2020, and factoring in interim distributions that had been cashed as
12 of that date, the receivership estate held approximately \$3.48 million.

13 On June 17, 2019, the Court approved a second interim distribution to
14 investors with allowed claims in the total amount of \$6 million. As part of the
15 Receiver's motion, a reserve sufficient to pay the ongoing fees and costs of the
16 receivership was maintained. Therefore, the receivership estate has the ability to
17 pay the fees and costs requested herein.

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

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

26 **V. CONCLUSION**

27 WHEREFORE, the Receiver and Allen Matkins respectfully request entry of
28 an order:

- 1 1. Approving payment of fees to Allen Matkins on an interim basis of
- 2 \$5,688.00;
- 3 2. Approving reimbursement of expenses to Allen Matkins on an interim
- 4 basis of \$18.00;
- 5 3. Authorizing and directing the Receiver to pay these amounts to Allen
- 6 Matkins from assets of the Receivership Entities; and
- 7 4. Granting such further and other relief as the Court deems just and
- 8 proper.

9
10 Dated: July 10, 2020

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/ Edward Fates

EDWARD G. FATES
Attorneys for Receiver
THOMAS C. HEBRANK

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EXHIBIT INDEX

Exhibit A	Detailed Time Reports	9
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EXHIBIT A

EXHIBIT A

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05/12/20 11:32:35 PROFORMA STATEMENT FOR MATTER 372640.00002 (Thomas C. Hebrank, as Receiver for Weste) (General Receivership)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward Matter #: 372640.00002 Client Name: Thomas C. Hebrank, as Receiver for Weste
 (Ted)
 Date of Last Billing: 04/05/20 Matter Name: General Receivership
 Proforma Number: 1037060
 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	
03/03/20	8025432	Advise Receiver on issues re: FTB tax claims against Western	Fates, Edward (Ted)	0.20	103.50	103.50	WO	HD	TR

Disbursements for Matter 372640.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	Circle	Action	
02/14/20	2643186	MSNGR – First Legal, LLC - USDC Southern District, Courtesy copy to Judge Curiel at USDC Southern District	0.00	18.00	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.20	517.50	103.50
		0.20		\$103.50
	Subtotal Fees			\$103.50
	Discount			0.00
	Total Fees			103.50
	Total Disbursements			18.00

Attorney Billing Instructions

() BILL ALL () Hold

05/12/20 11:32:35 PROFORMA STATEMENT FOR MATTER 372640.00002 (Thomas C. Hebrank, as Receiver for Weste) (General Receivership)

() 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 05/12/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	973.00	927.00	46.00	121.50	103.50	18.00	121.50	103.50	18.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	10.87	10.87	0.00
Billed	2,286.42	1,979.54	306.88	1,222.86	1,035.00	187.86	392,274.67	392,274.67	30,185.46
Collected	2,286.42	1,979.54	306.88	1,222.86	1,035.00	187.86	422,460.13	392,274.67	30,185.46
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP Balance	1,239.73	927.00	312.73						
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

}
 05/12/20 11:32:37 PROFORMA STATEMENT FOR MATTER 372640.00004 (Thomas C. Hebrank, as Receiver for Weste) (Reporting)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward Matter #: 372640.00004 Client Name: Thomas C. Hebrank, as Receiver for Weste
 (Ted)
 Date of Last Billing: 04/05/20 Matter Name: Reporting
 Proforma Number: 1037060
 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		
02/18/20	8007544	Work on Receiver's 30th interim report (1.1) discuss same with Receiver and G. Rodriguez (.2)	Fates, Edward (Ted)	1.30	672.75	672.75	WO	HD	TR	_____
03/25/20	8044076	Discuss 30th interim report with Receiver	Fates, Edward (Ted)	0.40	207.00	879.75	WO	HD	TR	_____
03/30/20	8048146	Revisions to interim report exhibits	Fates, Edward (Ted)	0.20	103.50	983.25	WO	HD	TR	_____
03/31/20	8049224	Work on revisions to 30th interim report (.6) discuss same with Receiver (.1)	Fates, Edward (Ted)	0.70	362.25	1,345.50	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.60	517.50	1,345.50
		2.60		\$1,345.50
				\$1,345.50
				0.00
				1,345.50

05/12/20 11:32:37 PROFORMA STATEMENT FOR MATTER 372640.00004 (Thomas C. Hebrank, as Receiver for Weste) (Reporting)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
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 05/12/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	5,175.00	5,175.00	0.00	2,380.50	2,380.50	0.00	1,345.50	1,345.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	31.37	31.37	0.00
Billed	4,398.75	4,398.75	0.00	3,001.50	3,001.50	0.00	165,735.29	165,735.29	379.33
Collected	4,398.75	4,398.75	0.00	3,001.50	3,001.50	0.00	166,114.62	165,735.29	379.33
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	3,622.50	3,622.50	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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

05/12/20 11:32:37 PROFORMA STATEMENT FOR MATTER 372640.00004 (Thomas C. Hebrank, as Receiver for Weste) (Reporting)

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05/12/20 11:32:38 PROFORMA STATEMENT FOR MATTER 372640.00005 (Thomas C. Hebrank, as Receiver for Weste) (Operations & Asset Sales)

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

Matter #: 372640.00005

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

Date of Last Billing: 04/05/20

Matter Name: Operations & Asset Sales

Proforma Number: 1037060

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		
01/16/20	55230	Review Letter of Intent for Minden property.	Lorenzen, Jonathan	0.30	122.85	122.85	WO	HD	TR	_____
01/22/20	52639	Revise notice to investors regarding credible offers for Minden and Silver Springs South properties.	Fates, Edward (Ted)	0.30	155.25	278.10	WO	HD	TR	_____
01/23/20	63010	Review terms of PSA for the sale of a 2-acre portion of the Minden property; prepare initial draft of PSA for Minden.	Lorenzen, Jonathan	4.30	1,760.85	2,038.95	WO	HD	TR	_____
01/24/20	57918	Review issues with subdivision of property for Minden; complete preparation of PSA for 2-acre portion of Minden and send for Buyer's review.	Lorenzen, Jonathan	2.60	1,064.70	3,103.65	WO	HD	TR	_____
03/09/20	8040100	Begin drafting the purchase and sale agreement with KSA Advancements for that property commonly known as Silver Springs South based on the letter of intent and other information provided by the client.	Thiels, Megan	2.60	936.00	4,039.65	WO	HD	TR	_____

05/12/20 11:32:38 PROFORMA STATEMENT FOR MATTER 372640.00005 (Thomas C. Hebrank, as Receiver for Weste) (Operations & Asset Sales)

Fees for Matter 372640.00005.(Operations & Asset Sales)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
03/10/20	8031314	Review and revise Purchase and Sale Agreement for Silver Springs.	Lorenzen, Jonathan	0.80	327.60	4,367.25	WO	HD TR
03/10/20	8031348	Advise on revisions to purchase and sale agreement for Silver Springs South property.	Fates, Edward (Ted)	0.20	103.50	4,470.75	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.50	517.50	258.75
002115	Lorenzen, Jonathan	8.00	409.50	3,276.00
002306	Thiels, Megan	2.60	360.00	936.00
		<u>11.10</u>		<u>\$4,470.75</u>
Subtotal Fees				\$4,470.75
Discount				0.00
Total Fees				4,470.75
Total Disbursements				0.00

Attorney Billing Instructions

- | | |
|---|---------------------------------------|
| <input type="checkbox"/> BILL ALL | <input type="checkbox"/> Hold |
| <input type="checkbox"/> BILL FEES ONLY | <input type="checkbox"/> Write Off |
| <input type="checkbox"/> BILL COST ONLY | <input type="checkbox"/> 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 05/12/20

	Fiscal YTD		Calendar YTD				LTD		
Worked	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
	10,635.75	10,635.75	0.00	8,686.80	8,686.80	0.00	4,470.75	4,470.75	0.00

05/12/20 11:32:38 PROFORMA STATEMENT FOR MATTER 372640.00005 (Thomas C. Hebrank, as Receiver for Weste) (Operations & Asset Sales)

Unbilled Adj	5.40	5.40	0.00	0.00	0.00	0.00	31.54	31.54	0.00
Billed	19,849.09	19,849.09	0.00	11,168.54	11,168.54	0.00	433,971.66	433,971.66	0.00
Collected	19,849.09	19,849.09	0.00	11,168.54	11,168.54	0.00	433,971.66	433,971.66	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	Costs						
WIP	9,359.55	9,359.55	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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

}

05/12/20 11:32:39 PROFORMA STATEMENT FOR MATTER 372640.00006 (Thomas C. Hebrank, as Receiver for Weste) (Claims & Distributions)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward Matter #: 372640.00006 Client Name: Thomas C. Hebrank, as Receiver for Weste
 (Ted)
 Date of Last Billing: 04/05/20 Matter Name: Claims & Distributions
 Proforma Number: 1037060
 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		
01/27/20	57901	Revisions to monthly case update for investors.	Fates, Edward (Ted)	0.40	207.00	207.00	WO	HD	TR	_____
03/02/20	8023708	Respond to inquiry from investor regarding estimated timing of final distributions	Fates, Edward (Ted)	0.20	103.50	310.50	WO	HD	TR	_____
03/09/20	8030494	Revisions to monthly case update to investors	Fates, Edward (Ted)	0.30	155.25	465.75	WO	HD	TR	_____
03/20/20	8040594	Respond to direct inquiry from investor re: distributions	Fates, Edward (Ted)	0.20	103.50	569.25	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.10	517.50	569.25
		1.10		\$569.25
	Subtotal Fees			\$569.25
	Discount			0.00
	Total Fees			569.25
	Total Disbursements			0.00

05/12/20 11:32:39 PROFORMA STATEMENT FOR MATTER 372640.00006 (Thomas C. Hebrank, as Receiver for Weste) (Claims & Distributions)

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 05/12/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,570.75	3,570.75	0.00	879.75	879.75	0.00	569.25	569.25	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	8.45	8.45	0.00
Billed	8,228.25	8,228.25	0.00	5,692.50	5,692.50	0.00	185,841.10	185,841.10	0.00
Collected	8,228.25	8,228.25	0.00	5,692.50	5,692.50	0.00	185,841.10	185,841.10	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	Costs						
WIP	1,759.50	1,759.50	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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

}

05/12/20 11:32:40 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: 04/05/20 Matter Name: Employment/Fees
 Proforma Number: 1037060
 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		
01/14/20	24538	Communications with Receiver regarding 29th interim fee application.	Fates, Edward (Ted)	0.20	103.50	103.50	WO	HD	TR	_____
01/28/20	136417	Revisions to Receiver's fee application (.4); meet and confer communications with SEC counsel regarding same (.1).	Fates, Edward (Ted)	0.50	258.75	362.25	WO	HD	TR	_____
02/12/20	8003829	Meet and confer with SEC counsel re: interim fee applications, advise Receiver re: same	Fates, Edward (Ted)	0.20	103.50	465.75	WO	HD	TR	_____
02/14/20	8005574	Finalize Receiver's 29th fee application, proposed order and notice of hearing	Fates, Edward (Ted)	0.30	155.25	621.00	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.20	517.50	621.00
		1.20		\$621.00
Subtotal Fees				\$621.00
Discount				0.00

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Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
	Total Fees			621.00
	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 05/12/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,742.75	2,742.75	0.00	1,759.50	1,759.50	0.00	621.00	621.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.79	0.79	0.00
Billed	2,328.75	2,328.75	0.00	1,863.00	1,863.00	0.00	37,298.09	37,298.09	0.00
Collected	2,328.75	2,328.75	0.00	1,863.00	1,863.00	0.00	37,298.09	37,298.09	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	2,173.50	2,173.50	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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

05/12/20 11:32:40 PROFORMA STATEMENT FOR MATTER 372640.00009 (Thomas C. Hebrank, as Receiver for Weste) (Employment/Fees)

San Diego, CA 92101
