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

Date: January 8, 2021
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 Thirty-Second Interim Application for
 7 payment of professional fees for the time period April 1, 2020, through June 30,
 8 2020 ("Thirty-Second Application Period"). Allen Matkins incurred \$18,934.20 in
 9 fees during the three-month period and seeks interim approval and payment of 80%
 10 of fees incurred, or \$15,147.36. As it has throughout the case, Allen Matkins has
 11 discounted its customary hourly rates by 10%.

12 **I. FEE APPLICATION SUMMARY**

13 During the Thirty-Second Application Period, Allen Matkins provided a total
 14 of 41.10 hours of service for a total of \$18,934.20 in fees. Allen Matkins requests
 15 payment on an interim basis of 80% of this amount, or \$15,147.36. The firm has
 16 provided its services in the following categories, as discussed in further detail
 17 below and as set forth task-by-task in Exhibit A:

18 Category	Hours	Total
19 Reporting	2.0	\$1,035.00
20 Operations and Asset Sales	35.9	\$16,243.20
21 Claims and Distributions	1.0	\$517.50
22 Employment/Fees	2.2	\$1,138.50
Total Fees	41.10	\$18,934.20

23 **II. TASKS PERFORMED**

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

28

1 **A. Reporting**

2 This category includes time spent preparing the Receiver's Thirty-First
3 Interim Report filed on April 28. Dkt. No. 1762. The report includes detailed
4 updates regarding closed and pending sales of properties, and receipts and
5 disbursements for the receivership estate. The reasonable and necessary fees for
6 work in this category total \$1,035.00.

7 **B. Operations and Asset Sales**

8 Allen Matkins' time in this category focused on sales of receivership
9 properties via the Modified Orderly Sale Process. During the Thirty-Second
10 Application Period, this work focused on the Santa Fe, Dayton III, and Washoe III
11 properties, as well as the two-acre portion of the Minden property. Dkt. 1763,
12 1765, 1767, 1768. The reasonable and necessary fees for Allen Matkins' work in
13 this category total \$16,243.20.

14 **C. Claims and Distributions**

15 Allen Matkins assisted in addressing unique issues with investor
16 distributions, preparing monthly case updates to investors, and responding to
17 several direct inquiries from investors or their counsel regarding distributions. The
18 reasonable and necessary fees for this work total \$517.50.

19 **D. Employment/Fees**

20 Although fee applications are a necessary component of federal equity
21 receiverships, neither the Receiver nor his professionals bill time for preparing their
22 own detailed applications. Allen Matkins assisted the Receiver in preparing his
23 Thirtieth Fee Application and assisted Duffy in prepared its Eleventh Fee
24 Application, which applications were filed on April 17, 2020. Dkt. 1758, 1760.
25 The reasonable and necessary fees for this work total \$1,138.50.

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

27 From inception of the receivership through June 30, 2020, the Receiver
28 incurred fees and costs of \$2,459,956.64, of which amount \$482,962.05 is subject

1 to holdback pending approval of the Receiver's final fee application at the
2 conclusion of the receivership, \$19,021.50 awaiting the Court's review and
3 approval, and \$1,961,759.93 has been approved by the Court and paid to date.
4 During the same time period, Allen Matkins has incurred fees and costs of
5 \$1,840,452.83, of which amount \$376,133.26 is subject to holdback pending
6 approval of the Allen Matkins' final fee application at the conclusion of the
7 receivership, \$18,934.20 is awaiting the Court's review and approval, and
8 \$1,449,172.21 been approved by the Court and paid to date. Finally, during the
9 same time period, tax accountant Duffy Kruspodin & Company, LLP ("Duffy") has
10 incurred fees and costs totaling \$972,104.93, all of which has been paid to date for
11 preparing tax returns for Western, GP, and other non-GP Receivership Entities.

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

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

21 **A. Complexity of Tasks**

22 Here, the tasks performed by Allen Matkins are significantly complex and
23 the number of hours billed to complete them are reasonable. These tasks include
24 (a) advising the Receiver regarding federal equity receivership, debtor/creditor
25 rights, real property, contract, insurance, tax, civil procedure, judgment
26 enforcement and other applicable areas of law, and (b) assisting the Receiver in
27 selling assets, (c) assisting the Receiver in distributing receivership assets in a
28

1 manner that treats investors fairly and equitably, and (d) providing detailed reports
2 to the Court and interested parties.

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

4 The Court has previously determined on multiple occasions that the
5 discounted hourly rates of Allen Matkins represent the fair value of their time,
6 labor, and skill. Accordingly, Allen Matkins' discounted hourly rates continue to
7 represent the fair value of its time, labor, and skill. In addition, Allen Matkins
8 wrote off and did not charge for .90 hours of time during the Thirty-Second
9 Application Period (\$465.75).

10 **C. Quality of Work Performed**

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

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

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

1 Modified Orderly Sale Process (Dkt. Nos. 1309, 1359). As a result of sales closed
2 as of June 30, 2020, and factoring in interim distributions that had been cashed as
3 of that date, the receivership estate held approximately \$3.48 million.

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

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

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

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

17 **V. CONCLUSION**

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

20 1. Approving payment of fees to Allen Matkins on an interim basis of
21 \$15,147.36;

22 2. Authorizing and directing the Receiver to pay these amounts to Allen
23 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.

3
4 Dated: October 28, 2020

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

5
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	9
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EXHIBIT A

EXHIBIT A

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09/15/20 11:28:40 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: 08/26/20 Matter Name: Reporting
 Proforma Number: 1053224
 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	
04/23/20	8072418	Work on Receiver's 31st interim report (.9) discuss same with Receiver and G. Rodriguez (.2)	Fates, Edward (Ted)	1.10	569.25	569.25	WO	HD	TR
04/28/20	8076780	Revisions to 31st interim report (.7) discuss same with Receiver and G. Rodriguez (.2)	Fates, Edward (Ted)	0.90	465.75	1,035.00	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.00	517.50	1,035.00
		2.00		\$1,035.00
	Subtotal Fees			\$1,035.00
	Discount			0.00
	Total Fees			1,035.00
	Total Disbursements			0.00

Attorney Billing Instructions

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

09/15/20 11:28:40 PROFORMA STATEMENT FOR MATTER 372640.00004 (Thomas C. Hebrank, as Receiver for Weste) (Reporting)

Billing Instructions

EXPIRES 6/30/2021: 7/2016 rates less10% DISCOUNT ON FEES (rated code 10)- AUTOMATIC; copies @ .05; no text editing

Account Summary – As Of 09/15/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,449.00	1,449.00	0.00	3,829.50	3,829.50	0.00	1,035.00	1,035.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	38.12	38.12	0.00
Billed	1,345.50	1,345.50	0.00	5,595.75	5,595.75	0.00	168,329.54	168,329.54	379.33
Collected	1,345.50	1,345.50	0.00	5,595.75	5,595.75	0.00	168,708.87	168,329.54	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	Costs						
WIP	2,484.00	2,484.00	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

}

09/15/20 11:28:41 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: 08/26/20

Matter Name: Operations & Asset Sales

Proforma Number: 1053224

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		
04/03/20	8055384	Prepare amendment to Purchase and Sale Agreement for Minden to extend Contingency Date.	Lorenzen, Jonathan	0.60	245.70	245.70	WO	HD	TR	_____
04/06/20	8056356	Communications with Receiver Trustee transition issues	Fates, Edward (Ted)	0.30	155.25	400.95	WO	HD	TR	_____
04/17/20	8067477	Review Letter of Intent from Lansing for Silver Springs property.	Lorenzen, Jonathan	1.30	532.35	933.30	WO	HD	TR	_____
04/17/20	8068490	Advise on issues re: sale of Silver Springs property and terms for PSA	Fates, Edward (Ted)	0.40	207.00	1,140.30	WO	HD	TR	_____
04/20/20	8068459	Complete Purchase and Sale Agreement for Lansing to purchase Silver Springs property.	Lorenzen, Jonathan	0.80	327.60	1,467.90	WO	HD	TR	_____
04/27/20	8075769	Discuss remaining receivership properties and strategy/approach to sales with Receiver and G. Rodriguez	Fates, Edward (Ted)	0.50	258.75	1,726.65	WO	HD	TR	_____

09/15/20 11:28:41 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		
04/28/20	8076734	Prepare Purchase and Sale Agreement for Red Rocks property, and update Form Purchase and Sale Agreement to incorporate recent updates to transactions.	Lorenzen, Jonathan	3.10	1,269.45	2,996.10	WO	HD	TR	_____
04/30/20	8081324	Review Buyer's comments to Purchase and Sale Agreement for Red Rocks and prepare redraft.	Lorenzen, Jonathan	0.80	327.60	3,323.70	WO	HD	TR	_____
05/01/20	8084200	Review final version of Purchase and Sale Agreement for Santa Fe property, and review related Letter of Intent for Overbid Purchase and Sale Agreement.	Lorenzen, Jonathan	0.90	368.55	3,692.25	WO	HD	TR	_____
05/04/20	8084842	Review terms of overbid offer for Santa Fe property, and revise initial draft of Purchase and Sale Agreement.	Lorenzen, Jonathan	0.90	368.55	4,060.80	WO	HD	TR	_____
05/04/20	8084879	Analyze and advise on sales of remaining properties, list price issues, and court approval	Fates, Edward (Ted)	0.30	155.25	4,216.05	WO	HD	TR	_____
05/04/20	8084945	Begin drafting the overbid purchase and sale agreement with Lobco Investments LLC; prepare clean and redline versions of such agreement; correspond with the client re: such agreement.	Thiels, Megan	1.30	468.00	4,684.05	WO	HD	TR	_____
05/18/20	8096303	Revisions to notices to investors re: offers received on four receivership properties	Fates, Edward (Ted)	0.40	207.00	4,891.05	WO	HD	TR	_____
05/19/20	8097396	Review letters of intent for Dayton III and Washoe III, and prepare corresponding Purchase and Sale Agreements; review related correspondence.	Lorenzen, Jonathan	3.90	1,597.05	6,488.10	WO	HD	TR	_____

09/15/20 11:28:41 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		
05/19/20	8097432	Communications with G. Rodriguez re: proposed sale of Santa Fe and motion to approve same (.4) work on sale motion (1.5)	Fates, Edward (Ted)	1.90	983.25	7,471.35	WO	HD	TR	_____
05/20/20	8098496	Discuss revisions to motion re: sale of Santa Fe property with Receiver and G. Rodriguez (.3) work on same and Receiver declaration in support of motion (.9) work on proposed order and notice of motion (.2)	Fates, Edward (Ted)	1.40	724.50	8,195.85	WO	HD	TR	_____
05/28/20	8106711	Review comments to Purchase and Sale Agreement for Washoe III property.	Lorenzen, Jonathan	0.20	81.90	8,277.75	WO	HD	TR	_____
05/29/20	8109838	Coordinate closing for Washoe III.	Lorenzen, Jonathan	0.90	368.55	8,646.30	WO	HD	TR	_____
05/29/20	8110254	Begin editing and revising the purchase and sale agreement with Adam Ferran and Greg Garcia for the Washoe III property.	Thiels, Megan	1.20	432.00	9,078.30	WO	HD	TR	_____
06/05/20	8114708	Review executed Purchase and Sale Agreement for Washoe III.	Lorenzen, Jonathan	0.30	122.85	9,201.15	WO	HD	TR	_____
06/05/20	8121902	review and analyze the Washoe III PSA executed by buyer; correspond with client re: the new title report for such property.	Thiels, Megan	0.60	216.00	9,417.15	WO	HD	TR	_____
06/08/20	8116032	Review executed version of Purchase and Sale Agreement for Washoe III, and prepare Overbid Purchase and Sale Agreement.	Lorenzen, Jonathan	1.20	491.40	9,908.55	WO	HD	TR	_____
06/08/20	8116135	Discuss sale of Washoe III property with G. Rodriguez (.2) initial work on motion for approval of sale (.4)	Fates, Edward (Ted)	0.60	310.50	10,219.05	WO	HD	TR	_____

09/15/20 11:28:41 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		
06/09/20	8117148	Work on motion for approval of sale of Washoe III property (1.4) discuss same with G. Rodriguez (.2)	Fates, Edward (Ted)	1.60	828.00	11,047.05	WO	HD	TR	_____
06/09/20	8117419	Review updated title report for Washoe III.	Lorenzen, Jonathan	0.60	245.70	11,292.75	WO	HD	TR	_____
06/10/20	8118213	Prepare slip pages for Washoe III Purchase and Sale Agreement.	Lorenzen, Jonathan	0.20	81.90	11,374.65	WO	HD	TR	_____
06/12/20	8120300	Review updated title report for Washoe III and prepare slip pages to update legal description of property.	Lorenzen, Jonathan	0.60	245.70	11,620.35	WO	HD	TR	_____
06/12/20	8120306	Revisions to motion for approval of Washoe III sale (.4) discuss same with G. Rodriguez (.2)	Fates, Edward (Ted)	0.60	310.50	11,930.85	WO	HD	TR	_____
06/15/20	8121398	Communications with Receiver and G. Rodriguez re: overbid received for Santa Fe property	Fates, Edward (Ted)	0.20	103.50	12,034.35	WO	HD	TR	_____
06/15/20	8121581	Communications with G. Rodriguez regarding revised purchase and sale agreement for Washoe III sale	Fates, Edward (Ted)	0.20	103.50	12,137.85	WO	HD	TR	_____
06/17/20	8123262	Revise Overbid Purchase and Sale Agreement for Washoe III.	Lorenzen, Jonathan	0.60	245.70	12,383.55	WO	HD	TR	_____
06/17/20	8123863	Work on Receiver's declaration in support of Washoe III sale motion, notice or motion and proposed order	Fates, Edward (Ted)	0.80	414.00	12,797.55	WO	HD	TR	_____
06/18/20	8124872	Review executed Overbid Purchase and Sale Agreement for Washoe III.	Lorenzen, Jonathan	0.20	81.90	12,879.45	WO	HD	TR	_____

09/15/20 11:28:41 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			
06/19/20	8125212	Discuss sales of Dayton III property and two-acre portion of Minden property with G. Rodriguez (.3) initial work on motions for approval of sales (.6)	Fates, Edward (Ted)	0.90	465.75	13,345.20	WO	HD	TR	_____
06/22/20	8126628	Work on motion for approval of sale of two-acre portion of Minden property (.9) work on notice of receipt of overbid for Santa Fe sale (.3) communications with G. Rodriguez re: sale (.2)	Fates, Edward (Ted)	1.40	724.50	14,069.70	WO	HD	TR	_____
06/23/20	8128004	Revise notice of overbid for Santa Fe sale (.2) revisions to sale motion for two-acre portion of Minden, discuss same with G. Rodriguez (.5) work on Receiver's declaration and proposed order for Minden sale motion (.7)	Fates, Edward (Ted)	1.40	724.50	14,794.20	WO	HD	TR	_____
06/24/20	8129153	Discuss sale of Santa Fee to overbidder, notice of same, and overbid purchase and sale agreement with G. Rodriguez	Fates, Edward (Ted)	0.40	207.00	15,001.20	WO	HD	TR	_____
06/25/20	8130062	Work on motion for approval of sale of Dayton III property and Receiver declaration in support of same (1.6) discuss same with G. Rodriguez (.2) work on notice of winning bid and amended proposed order for Santa Fe sale (.6)	Fates, Edward (Ted)	2.40	1,242.00	16,243.20	WO	HD	TR	_____

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	15.70	517.50	8,124.75
002115	Lorenzen, Jonathan	17.10	409.50	7,002.45

09/15/20 11:28:41 PROFORMA STATEMENT FOR MATTER 372640.00005 (Thomas C. Hebrank, as Receiver for Weste) (Operations & Asset Sales)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
002306	Thiels, Megan	3.10	360.00	1,116.00
		<u>35.90</u>		\$16,243.20
Subtotal Fees				\$16,243.20
Discount				0.00
Total Fees				16,243.20
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 09/15/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	15,686.90	15,686.90	0.00	34,982.00	34,982.00	0.00	16,243.20	16,243.20	0.00
Unbilled Adj	0.00	0.00	0.00	3.15	3.15	0.00	34.69	34.69	0.00
Billed	3,048.75	3,048.75	0.00	14,734.79	14,734.79	0.00	437,537.91	437,537.91	0.00
Collected	3,048.75	3,048.75	0.00	14,734.79	14,734.79	0.00	437,537.91	437,537.91	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	32,085.35	32,085.35	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

09/15/20 11:28:41 PROFORMA STATEMENT FOR MATTER 372640.00005 (Thomas C. Hebrank, as Receiver for Weste) (Operations & Asset Sales)

Billing Address

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

}

09/15/20 11:28:42 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: 08/26/20 Matter Name: Claims & Distributions
 Proforma Number: 1053224
 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		
04/27/20	8075887	Revisions to monthly case update to investors	Fates, Edward (Ted)	0.30	155.25	155.25	WO	HD	TR	_____
05/01/20	8084055	Address investor inquiries re: property sales and distributions	Fates, Edward (Ted)	0.30	155.25	310.50	WO	HD	TR	_____
06/17/20	8123697	Revisions to monthly case update to investors	Fates, Edward (Ted)	0.40	207.00	517.50	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.00	517.50	517.50
		1.00		\$517.50
	Subtotal Fees			\$517.50
	Discount			0.00
	Total Fees			517.50
	Total Disbursements			0.00

Attorney Billing Instructions

09/15/20 11:28:42 PROFORMA STATEMENT FOR MATTER 372640.00006 (Thomas C. Hebrank, as Receiver for Weste) (Claims & Distributions)

()	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 09/15/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	207.00	207.00	0.00	1,293.75	1,293.75	0.00	517.50	517.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	8.45	8.45	0.00
Billed	569.25	569.25	0.00	7,141.50	7,141.50	0.00	187,290.10	187,290.10	0.00
Collected	569.25	569.25	0.00	7,141.50	7,141.50	0.00	187,290.10	187,290.10	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	724.50	724.50	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

}

09/15/20 11:28:43 PROFORMA STATEMENT FOR MATTER 372640.00009 (Thomas C. Hebrank, as Receiver for Weste) (Employment/Fees)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward Matter #: 372640.00009 Client Name: Thomas C. Hebrank, as Receiver for Weste (Ted)
 Date of Last Billing: 08/26/20 Matter Name: Employment/Fees
 Proforma Number: 1053224
 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		
04/07/20	8057639	Revisions to Receiver's 30th fee application	Fates, Edward (Ted)	0.70	362.25	362.25	WO	HD	TR	_____
04/13/20	8062223	Communications with L. Benjamin re: Duffy interim fee application (.2) review and revise same (.7) meet and confer communications with SEC counsel (.2)	Fates, Edward (Ted)	1.10	569.25	931.50	WO	HD	TR	_____
04/16/20	8065664	Finalize fee applications, proposed orders, and notice for Receiver and Duffy	Fates, Edward (Ted)	0.40	207.00	1,138.50	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.20	517.50	1,138.50
		2.20		\$1,138.50
	Subtotal Fees			\$1,138.50
	Discount			0.00
	Total Fees			1,138.50
	Total Disbursements			0.00

09/15/20 11:28:43 PROFORMA STATEMENT FOR MATTER 372640.00009 (Thomas C. Hebrank, as Receiver for Weste) (Employment/Fees)

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 09/15/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	362.25	362.25	0.00	2,121.75	2,121.75	0.00	1,138.50	1,138.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.79	0.79	0.00
Billed	621.00	621.00	0.00	2,898.00	2,898.00	0.00	38,333.09	38,333.09	0.00
Collected	621.00	621.00	0.00	2,898.00	2,898.00	0.00	38,333.09	38,333.09	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 Balance	1,759.50	1,759.50	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