

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

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

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

Date: April 30, 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-Fourth Interim Application for  
 7 payment of professional fees and reimbursement of costs for the time period  
 8 October 1, 2020 through December 31, 2020 ("Thirty-Fourth Application Period").  
 9 Allen Matkins incurred \$10,129.05 in fees and \$9.12 in costs during the three-  
 10 month period and seeks interim approval and payment of 80% of fees incurred, or  
 11 \$8,103.24, 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-Fourth Application Period, Allen Matkins provided a total  
 15 of 20.70 hours of service for a total of \$10,129.05 in fees. Allen Matkins requests  
 16 payment on an interim basis of 80% of this amount, or \$8,103.24. 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 Reporting	2.60	\$1,345.50
21 Operations and Asset Sales	16.20	\$7,800.30
22 Claims and Distributions	0.70	\$362.25
23 Employment/Fees	1.20	\$621.00
Total Fees	20.70	\$10,129.05

### 24 II. TASKS PERFORMED

25 During the Thirty-Fourth Application Period, Allen Matkins worked  
 26 diligently to assist the Receiver with legal issues affecting the receivership. The  
 27  
 28

1 following is a discussion of Allen Matkins' work, broken down by the categories  
2 listed above.

3 **A. Reporting**

4 This category includes time spent preparing the Receiver's Thirty-Third  
5 Interim Report filed on November 28, 2020. Dkt. No. 1789. The report includes  
6 detailed updates regarding closed and pending sales of properties, and receipts and  
7 disbursements for the receivership estate. The reasonable and necessary fees for  
8 work in this category total \$1,345.50.

9 **B. Operations and Asset Sales**

10 Allen Matkins' time in this category focused on sales of receivership  
11 properties via the Modified Orderly Sale Process. During the Thirty-Fourth  
12 Application Period, this work focused on the Washoe III, the two-acre portion of  
13 the Minden property, and the Western-owned Dayton property. The reasonable and  
14 necessary fees for Allen Matkins' work in this category total \$7,800.30.

15 **C. Claims and Distributions**

16 Allen Matkins assisted in responding to direct inquiries from investors or  
17 their counsel regarding distributions. The reasonable and necessary fees for this  
18 work total \$362.25.

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 Thirty-Second and Thirty-Third Fee Applications. The reasonable and necessary  
24 fees for this work total \$621.00.

25 **E. Summary of Costs Requested**

26 Allen Matkins requests the Court approve reimbursement of \$9.12 for out-of-  
27 pocket costs incurred in executing the foregoing tasks, as itemized in Exhibit A.  
28 Pursuant to the Court's Order Granting in Part First Fee Applications, Allen

1 Matkins has reduced its request for reimbursement of copy costs to five cents per  
2 page and written off any excess copy charges incurred.

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

4 From inception of the receivership through December 31, 2020, the Receiver  
5 incurred fees and costs of \$2,485,224.19, of which amount \$487,976.31 is subject  
6 to holdback pending approval of the Receiver's final fee application at the  
7 conclusion of the receivership, \$9,767.29 awaiting the Court's review and approval,  
8 and \$1,989,419.19 has been approved by the Court and paid to date. During the  
9 same time period, Allen Matkins has incurred fees and costs of \$1,871,455.65, of  
10 which amount \$382,332.00 is subject to holdback pending approval of the Allen  
11 Matkins' final fee application at the conclusion of the receivership, \$10,138.17 is  
12 awaiting the Court's review and approval, and \$1,481,011.29 been approved by the  
13 Court and paid to date. Finally, during the same time period, tax accountant Duffy  
14 Kruspodin & Company, LLP ("Duffy") has incurred fees and costs totaling  
15 \$972,104.93, all of which has been paid to date for preparing tax returns for  
16 Western, GP, and other non-GP Receivership Entities.

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

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

26 **A. Complexity of Tasks**

27 Here, the tasks performed by Allen Matkins are significantly complex and  
28 the number of hours billed to complete them are reasonable. These tasks include

1 (a) advising the Receiver regarding federal equity receivership, debtor/creditor  
2 rights, real property, contract, insurance, tax, civil procedure, judgment  
3 enforcement and other applicable areas of law, and (b) assisting the Receiver in  
4 selling assets, (c) assisting the Receiver in distributing receivership assets in a  
5 manner that treats investors fairly and equitably, and (d) providing detailed reports  
6 to the Court and interested parties.

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

8 The Court has previously determined on multiple occasions that the  
9 discounted hourly rates of Allen Matkins represent the fair value of their time,  
10 labor, and skill. Accordingly, Allen Matkins' discounted hourly rates continue to  
11 represent the fair value of its time, labor, and skill. In addition, Allen Matkins  
12 wrote off and did not charge for 1.70 hours of time during the Thirty-Fourth  
13 Application Period (\$879.75).

14 **C. Quality of Work Performed**

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

27  
28



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

3  
4 Dated: March 18, 2021

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  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**EXHIBIT INDEX**

Exhibit A	Detailed Time Reports	9
-----------	-----------------------	---



# EXHIBIT A

# EXHIBIT A

}

03/17/21 12:06:51 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: 12/29/20      Matter Name: Reporting  
 Proforma Number: 1081483  
 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		
11/18/20	8268266	Work on Receiver's 33rd interim report (1.3) discuss same with Receiver and G. Rodriguez (.3)	Fates, Edward (Ted)	1.60	828.00	828.00	WO	HD	TR	_____
11/20/20	8270727	Revisions to Receiver's 33rd interim report (.4) discuss same with Receiver and G. Rodriguez (.2)	Fates, Edward (Ted)	0.60	310.50	1,138.50	WO	HD	TR	_____
11/24/20	8273741	Revise and finalize 33rd interim report	Fates, Edward (Ted)	0.40	207.00	1,345.50	WO	HD	TR	_____

**Disbursements for Matter 372640.00004 (Reporting)**

Trans Date	Index	Type	Quantity	Amt	Circle	Action		
12/30/20	2685242	BW – Duplication - Black & White Copies	48.00	9.12	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

03/17/21 12:06:51 PROFORMA STATEMENT FOR MATTER 372640.00004 (Thomas C. Hebrank, as Receiver for Weste) (Reporting)

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
				\$1,345.50
				0.00
				1,345.50
				9.12

**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 03/17/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,929.45	3,881.25	48.20	1,086.75	1,086.75	0.00	1,354.62	1,345.50	9.12
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	38.12	38.12	0.00
Billed	2,380.50	2,380.50	0.00	0.00	0.00	0.00	169,364.54	169,364.54	379.33
Collected	2,380.50	2,380.50	0.00	1,035.00	1,035.00	0.00	169,743.87	169,364.54	379.33
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>3,890.37</b>	<b>3,881.25</b>	<b>9.12</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

03/17/21 12:06:51 PROFORMA STATEMENT FOR MATTER 372640.00004 (Thomas C. Hebrank, as Receiver for Weste) (Reporting)

c/o E3 Advisors  
501 West Broadway, Suite 800  
San Diego, CA 92101

---

}

03/17/21 12:06:52 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: 12/29/20

Matter Name: Operations &amp; Asset Sales

Proforma Number: 1081483

Client/Matter Joint Group # 372640-1

**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>		
10/05/20	8225707	Discuss plan for sale of remaining properties with Receiver and G. Rodriguez	Fates, Edward (Ted)	0.50	258.75	258.75	WO	HD	TR	_____
11/09/20	8259960	Analyze and advise on sale and overbid issues for Washoe III property	Fates, Edward (Ted)	0.30	155.25	414.00	WO	HD	TR	_____
11/09/20	8260041	Review updated terms for Washoe III.	Lorenzen, Jonathan	0.30	122.85	536.85	WO	HD	TR	_____
11/10/20	8260749	Complete preparation of draft Purchase and Sale Agreement for Washoe III (1.1); review water issues for Minden (0.4); review correspondence regarding updates to Minden Sawmill Purchase and Sale Agreement and prepare revised version (0.9).	Lorenzen, Jonathan	2.40	982.80	1,519.65	WO	HD	TR	_____
11/12/20	8263455	Communications with local counsel in NV and G. Rodriguez re: water rights issues for Minden property	Fates, Edward (Ted)	0.30	155.25	1,674.90	WO	HD	TR	_____

03/17/21 12:06:52 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>		
11/12/20	8263525	Review executed version of Washoe III Purchase and Sale Agreement.	Lorenzen, Jonathan	0.50	204.75	1,879.65	WO	HD	TR	_____
11/16/20	8266124	Review Letter of Intent for Lyon property and prepare initial draft of Purchase and Sale Agreement.	Lorenzen, Jonathan	0.90	368.55	2,248.20	WO	HD	TR	_____
11/17/20	8267023	Complete Purchase and Sale Agreement for Lyon property.	Lorenzen, Jonathan	0.90	368.55	2,616.75	WO	HD	TR	_____
11/20/20	8270824	Advise G. Rodriguez on water rights issues for Minden property	Fates, Edward (Ted)	0.20	103.50	2,720.25	WO	HD	TR	_____
11/23/20	8273060	Review Purchase and Sale Agreement from Buyer for Lyon property.	Lorenzen, Jonathan	0.20	81.90	2,802.15	WO	HD	TR	_____
11/24/20	8273543	Work on motion for approval of sale of Washoe III property (1.4) discuss same with G. Rodriguez (.3)	Fates, Edward (Ted)	1.70	879.75	3,681.90	WO	HD	TR	_____
11/25/20	8274852	Revisions to Washoe III sale motion (.4) discuss same with G. Rodriguez (.2)	Fates, Edward (Ted)	0.60	310.50	3,992.40	WO	HD	TR	_____
11/30/20	8277801	Confirm status of Minden Purchase and Sale Agreement.	Lorenzen, Jonathan	0.20	81.90	4,074.30	WO	HD	TR	_____
11/30/20	8281482	Work on Receiver's declaration, notice and proposed order for Washoe III sale motion (1.1) revisions to notice to investors re: offer for remaining Dayton land (.2)	Fates, Edward (Ted)	1.30	672.75	4,747.05	WO	HD	TR	_____
12/02/20	8282945	Address issues re: form of order for Washoe III sale and release of prior deposit	Fates, Edward (Ted)	0.20	103.50	4,850.55	WO	HD	TR	_____

03/17/21 12:06:52 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>		
12/07/20	8286366	Advise Receiver on issues with potential overbid for Washoe III sale and strategy re: same	Fates, Edward (Ted)	0.40	207.00	5,057.55	WO	HD	TR	_____
12/10/20	8289435	Communications with G. Rodriguez re: proposed order for Washoe III sale and resolution of dispute re: prior deposit	Fates, Edward (Ted)	0.20	103.50	5,161.05	WO	HD	TR	_____
12/10/20	8290066	Advise G. Rodriguez on title issues re: release of prior deposit and form of proposed order re: same	Fates, Edward (Ted)	0.30	155.25	5,316.30	WO	HD	TR	_____
12/11/20	8290853	Communications with G. Rodriguez and title company re: issues with Washoe III prior deposit	Fates, Edward (Ted)	0.20	103.50	5,419.80	WO	HD	TR	_____
12/14/20	8292638	Communications with G. Rodriguez re: sale of Western-owned Dayton land (.2) work on motion for approval of sale (.6)	Fates, Edward (Ted)	0.80	414.00	5,833.80	WO	HD	TR	_____
12/15/20	8293986	Work on motion for approval of sale of Western-owned Dayton property (1.5) discuss same with G. Rodriguez (.2) revisions to motion (.2) work on Receiver declaration in support of sale motion (.6)	Fates, Edward (Ted)	2.50	1,293.75	7,127.55	WO	HD	TR	_____
12/23/20	8301605	Communications with G. Rodriguez re: Washoe III escrow issues	Fates, Edward (Ted)	0.20	103.50	7,231.05	WO	HD	TR	_____
12/29/20	8304050	Communications with G. Rodriguez re: title, escrow, and overbid issues for Washoe III sale	Fates, Edward (Ted)	0.40	207.00	7,438.05	WO	HD	TR	_____
12/30/20	8305524	Analyze and advise Receiver and G. Rodriguez on issues with failed sale of Washoe III, prior deposit, new sale/auction	Fates, Edward (Ted)	0.70	362.25	7,800.30	WO	HD	TR	_____

03/17/21 12:06:52 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
		and resolution of deposit dispute (.4) communications with counsel for prior buyer re: same (.3)					

**Proforma Summary**

Timekeeper		Hours	Rate	Amounts
Number	Timekeeper			
001665	Fates, Edward (Ted)	10.80	517.50	5,589.00
002115	Lorenzen, Jonathan	5.40	409.50	2,211.30
		<u>16.20</u>		<u>\$7,800.30</u>
Subtotal Fees				\$7,800.30
Discount				0.00
Total Fees				7,800.30
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 6/30/2021: 7/2016 rates less 10% DISCOUNT ON FEES (rated code 10)- AUTOMATIC; copies @ .05; no text editing

**Account Summary – As Of 03/17/21**

	Fiscal YTD		Calendar YTD				LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	39,953.45	39,953.45	0.00	13,665.50	13,665.50	0.00	7,800.30	7,800.30	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	37.03	37.03	0.00
Billed	15,505.11	15,505.11	0.00	0.00	0.00	0.00	449,994.27	449,994.27	0.00
Collected	15,505.11	15,505.11	0.00	12,456.36	12,456.36	0.00	449,994.27	449,994.27	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00



03/17/21 12:06:52 PROFORMA STATEMENT FOR MATTER 372640.00005 (Thomas C. Hebrank, as Receiver for Weste) (Operations & Asset Sales)

	<i>Total</i>	<i>Fees</i>	<i>Costs</i>
<i>WIP</i>	<b>39,953.45</b>	<b>39,953.45</b>	<b>0.00</b>
<i>Balance</i>			
<i>AR Balance</i>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<i>Unalloc</i>	<b>0.00</b>		
<i>Payment</i>			
<i>Client Trust</i>	<b>0.00</b>		
<i>Balance</i>			

---

**Billing Address**

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

---

}

03/17/21 12:06:54 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: 12/29/20      Matter Name: Claims & Distributions  
 Proforma Number: 1081483  
 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	
10/13/20	8232667	Respond to investor inquiries re: final distributions	Fates, Edward (Ted)	0.30	155.25	155.25	WO	HD	TR
11/19/20	8269679	Respond to inquiry from counsel for investor re: final distributions	Fates, Edward (Ted)	0.20	103.50	258.75	WO	HD	TR
12/08/20	8287605	Respond to inquiry from counsel for investor re: distributions	Fates, Edward (Ted)	0.20	103.50	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**

03/17/21 12:06:54 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 03/17/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,190.25	1,190.25	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	8.45	8.45	0.00
Billed	1,086.75	1,086.75	0.00	0.00	0.00	0.00	187,807.60	187,807.60	0.00
Collected	1,086.75	1,086.75	0.00	517.50	517.50	0.00	187,807.60	187,807.60	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>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>1,190.25</b>	<b>1,190.25</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

}

03/17/21 12:06:55 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: 12/29/20      Matter Name: Employment/Fees  
 Proforma Number: 1081483  
 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
10/20/20	8238675	Revisions to Receiver's 32nd fee application, discuss same with Receiver (.3) meet and confer communications with SEC counsel re: fee applications (.1)	Fates, Edward (Ted)	0.40	207.00	207.00	WO	HD TR
10/27/20	8245392	Meet and confer communications with SEC counsel re: interim fee applications and estimated timeline to conclude receivership (.2) work on proposed order and notice for Receiver's interim fee application (.2)	Fates, Edward (Ted)	0.40	207.00	414.00	WO	HD TR
12/14/20	8293005	Revisions to Receiver's 33rd interim fee application (.3) meet and confer communications with SEC counsel re: same (.1)	Fates, Edward (Ted)	0.40	207.00	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

03/17/21 12:06:55 PROFORMA STATEMENT FOR MATTER 372640.00009 (Thomas C. Hebrank, as Receiver for Weste) (Employment/Fees)

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
Discount				0.00
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 6/30/2021: 7/2016 rates less 10% DISCOUNT ON FEES (rated code 10)- AUTOMATIC; copies @ .05; no text editing

**Account Summary – As Of 03/17/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,138.50	1,138.50	0.00	155.25	155.25	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	1,759.50	1,759.50	0.00	0.00	0.00	0.00	39,471.59	39,471.59	0.00
Collected	1,759.50	1,759.50	0.00	1,138.50	1,138.50	0.00	39,471.59	39,471.59	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>1,138.50</b>	<b>1,138.50</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