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10 Attorneys for Receiver
11 THOMAS HEBRANK

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

14
15 SECURITIES AND EXCHANGE
COMMISSION,

16 Plaintiff,

17 v.

18 PACIFIC WEST CAPITAL GROUP,
19 INC.; ANDREW B CALHOUN IV;
PWCG TRUST; BRENDA CHRISTINE
20 BARRY; BAK WEST, INC.; ANDREW B
CALHOUN JR.; ERIC CHRISTOPHER
21 CANNON; CENTURY POINT, LLC;
MICHAEL WAYNE DOTTA; and
22 CALEB AUSTIN MOODY (dba SKY
STONE),

23 Defendants.
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Case No. 2:15-cv-02563-DDP-FFM

**ELEVENTH INTERIM
APPLICATION OF ALLEN
MATKINS LECK GAMBLE
MALLORY & NATSIS, LLP,
GENERAL COUNSEL TO THE
RECEIVER, FOR PAYMENT OF
FEES AND REIMBURSEMENT OF
EXPENSES**

Date: February 22, 2021
Time: 10:00 a.m.
Ctrm.: 9C
Judge: Hon. Dean D. Pregerson

1 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"),
2 general counsel to Thomas Hebrank ("Receiver"), the Court-appointed receiver for
3 PWCG Trust, hereby submits this eleventh interim application for approval and
4 payment of fees and reimbursement of expenses ("Application"). This Application
5 covers the period from July 1, 2020, through September 30, 2020 ("Eleventh
6 Application Period"), and seeks interim approval of \$95,548.95 in fees and
7 \$1,311.46 in expenses, and an order authorizing the Receiver to pay, on an interim
8 basis, 80% of the fees incurred (\$76,439.16) and 100% of expenses incurred.

9 I. INTRODUCTION

10 This equity receivership was established pursuant to the Consent of
11 Defendant PWCG Trust filed on February 12, 2018, and the Judgment as to
12 Defendant PWCG Trust ("Appointment Order") entered on February 16, 2018. Dkt.
13 Nos. 143, 145. The Appointment Order confers full powers of an equity receiver,
14 including full power over all funds, assets, and other property of PWCG Trust, and
15 including its bank accounts, life insurance policies ("Policies"), books and records,
16 and all funds and assets controlled or managed by PWCG Trust. The Appointment
17 Order also authorizes the Receiver to "engage and employ attorneys, accountants,
18 and other persons" to assist him in the performance of his duties. Dkt. No. 145,
19 Section III(F).

20 The Receiver promptly determined that his experienced staff at E3 Realty
21 Advisors, Inc., dba E3 Advisors ("E3"), as well as experienced, qualified counsel
22 was critical due to the number of people involved, the amount at stake for investors,
23 the transactional volume, and the complex issues facing PWCG Trust. Accordingly,
24 the Receiver has cost-effectively used his team at E3 to assist in carrying out
25 receivership duties, as well as Allen Matkins as his counsel.

26 In an abundance of caution, the Receiver sought specific Court approval of
27 Allen Matkins' employment, which was approved on April 10, 2018. Dkt. Nos. 150,
28

152. The Court also approved the Receiver's proposal to file reports and fee applications on a quarterly basis. *Id.*

II. FEE APPLICATION

This fee application should be read in conjunction with the Receiver's Eleventh Interim Report ("Eleventh Report") filed on January 14, 2020 (Dkt. No. 386), which describes in detail the Receiver's activities during the Eleventh Application Period. This Application seeks interim approval of \$95,548.95 in fees for a total of 134.30 hours worked, and payment on an interim basis of 80% of that amount, or \$76,439.16. The work performed is described task-by-task on Exhibit A and is broken down into the following categories:

Category	Hours	Amount
General Receivership	18.50	\$14,388.30
Reporting	3.80	\$2,577.15
Operations & Asset Sales	2.20	\$1,559.25
Claims & Distributions	36.50	\$26,169.30
Third Party Recoveries	18.10	\$9,211.95
Pending Litigation	1.90	\$1,259.55
Employment/Fees	0.70	\$428.40
MP&C Litigation	52.60	\$39,955.05
Total	134.30	\$95,548.95

Allen Matkins has worked diligently and efficiently to assist the Receiver to address legal issues facing the receivership estate. The firm's work has allowed the Receiver to preserve and protect the substantial value of receivership estate assets. Allen Matkins' work has assisted the Receiver in carrying out his Court-ordered duties and the firm should be compensated on an interim basis.

III. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED

A. Categories and Descriptions of Work

1. General Receivership

Work in this category focused on assisting and advising the Receiver on issues related to the trial of the SEC's claims against the remaining defendants,

1 which was scheduled for February 4, 2020, was continued to May 19, 2020, was
2 then continued again to September 15, 2020, then to November 10, 2020, and most
3 recently to March 9, 2021. Dkt. 303, 327, 364. The remaining defendants have
4 issued a subpoena to the Receiver for the production of documents and his
5 attendance at a deposition. The reasonable and necessary fees for work in this
6 category total \$14,388.30.

7 2. Reporting

8 Allen Matkins' time in this category focused on completing the Receiver's
9 Tenth Interim Report, which was filed on September 22, 2020. Dkt. 365. The
10 report contains detailed descriptions of the Receiver's activities during the second
11 quarter of 2020, policy maturities, investor communications, pending litigation, tax
12 issues, and post-receivership receipts and disbursements. The report also includes
13 the Receiver's recommendations for the continued administration of the receivership
14 estate. The reasonable and necessary fees for work in this category total \$2,577.15.

15 3. Operations & Asset Sales

16 Allen Matkins' time in this category focused on advising and assisting the
17 Receiver regarding policy maturities and their impact on cash flow for the overall
18 portfolio. The reasonable and necessary fees for work in this category total
19 \$1,559.25.

20 4. Claims and Distributions

21 Allen Matkins' time in this category focused on assisting the Receiver in
22 implementing the Court-approved procedures for the administration of claims
23 against the receivership estate. This work included advising the Receiver on unique
24 claim issues and calculations, the accounting process, and documentation needed for
25 the administration of investor claims. Allen Matkins also advised the Receiver
26 regarding the large claims asserted by BroadRiver Asset Management
27 ("BroadRiver"), of behalf of Cook Street Master Trust ("CSMT") and handled
28 communications with counsel for BroadRiver.

1 Allen Matkins also addressed the request of an investor to assign a claim
2 against the receivership estate to another investor. The firm also assisted the
3 Receiver in preparing content for the receivership website, including answers to
4 frequently asked questions and monthly case updates, and assisted in addressing
5 unique investor inquiries. The reasonable and necessary fees for work in this
6 category total \$26,169.30.

7 5. Third Party Recoveries

8 Allen Matkins' work in this category focused on assisting the Receiver in
9 formulating demand letters and proposed settlement agreements, which were sent to
10 investors who received profits from their investments in PWCG Trust. The
11 Receiver, with Allen Matkins' assistance, has already reached several settlements of
12 these claims, which will generate over \$208,000 in recoveries for the receivership
13 estate. The Court approved these settlements on January 14, 2020. Dkt. 384. The
14 Receiver is working to reach other settlements. The reasonable and necessary fees
15 for work in this category total \$9,211.95.

16 6. Pending Litigation

17 At the time of the Receiver's appointment, there were four civil actions
18 brought by investors that were pending in Los Angeles Superior Court in which
19 PWCG Trust (or MPC as its Trustee) is a defendant. Allen Matkins promptly
20 (a) provided counsel for the parties in these cases with notice of the Receiver's
21 appointment and the stay of litigation against PWCG Trust, and (b) filed a notice of
22 the receivership and the litigation stay in each case.

23 During the Eleventh Application Period, Allen Matkins assisted in preparing a
24 joint status report in the pending *Shechter* case and communicated with counsel for
25 MPC regarding the *Names* case (which has since been dismissed). The reasonable
26 and necessary fees for work in this category total \$1,259.55.

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1 7. Employment/Fees

2 Although fee applications are a necessary component of federal equity
3 receiverships, neither the Receiver nor his professionals charge for time spent
4 preparing their own detailed applications. Allen Matkins assisted the Receiver's tax
5 accountant, Duffy Kruspodin LLP, in preparing their first fee applications.
6 Dkt. 330. The reasonable and necessary fees for work in this category total \$428.40.

7 8. MP&C Litigation¹

8 Allen Matkins' time in this category focused on the Receiver's claims against
9 Mills Potoczak & Company ("MPC") on behalf of PWCG Trust. The firm assisted
10 the Receiver in analyzing the claims and discussing them with counsel for MPC, as
11 well as counsel for the investor-plaintiffs in the pending *Shechter* and *Applebaum*
12 cases in Los Angeles Superior Court. The parties then agreed to participate in a
13 mediation, which has since been deferred due to issues that arose regarding the
14 various insurers and insurance policies that potentially provide coverage for the
15 Receiver's and the investors' claims.

16 The firm continued to assist the Receiver in analyzing issues concerning
17 MPC's insurance coverage and in discussions with counsel for MPC and counsel for
18 the investor-plaintiffs regarding the parties' respective claims and a possible global
19 resolution. Allen Matkins assisted the Receiver in preparing a motion seeking
20 authority to bring a related action against MPC, along with a draft complaint against
21 MPC, which was attached as an exhibit. The motion was filed on May 5, 2020 and
22 granted on July 31, 2020. Dkt. 335, 357.

23 Allen Matkins assisted the Receiver in revising the Complaint against MPC,
24 filing it on September 3, 2020 as a related action, and serving it on MPC's counsel.
25 The firm also continued to discuss the coordination of prosecution of the Receiver
26

27 ¹ Because this matter involves pending litigation, Allen Matkins' time entries have
28 been redacted so as not to disclose confidential information relating to the
Receiver's litigation strategy or approach to the case. An unredacted copy can be
provided to the Court upon request for *in camera* review.

claims and the investors' claims with counsel for the putative investor class in the pending *Shechter* and *Applebaum* cases. The reasonable and necessary fees for work in this category total \$39,955.05.

B. Summary of Expenses Requested for Reimbursement

Allen Matkins requests the Court approve reimbursement of \$1,311.46 in out-of-pocket costs. The itemization of such expenses is summarized below by category.

Category	Total
E-Discovery	\$450.00
Document Searches (incl. PACER, Lexis, Sec. of State)	\$126.40
Messenger/FedEx Fees	\$132.56
Duplication	\$61.90
Postage	\$288.60
Court Filing Fees	\$400.00
Telephonic Court Appearances (Credit)	(\$148.00)
TOTAL	\$1,311.46

FEES AND COSTS INCURRED AND PAID TO DATE

From inception of the receivership through September 30, 2020, the Receiver incurred fees and costs of \$366,798.15, of which amount \$68,754.60 is subject to holdback pending approval of the Receiver's final fee application at the conclusion of the receivership, \$41,030.54 is awaiting the Court's review and approval, and \$264,882.25 has been approved by the Court and paid to date. During the same time period, Allen Matkins has incurred fees and costs of \$827,095.34, of which amount \$163,470.42 is subject to holdback pending approval of Allen Matkins' final fee application at the conclusion of the receivership, \$96,548.56 is awaiting the Court's review and approval, and \$586,123.78 has been approved by the Court and paid to date. Finally, during the same time period, MPC has incurred fees and costs totaling \$195,958.96, of which amount \$7,767.59 is awaiting the Court's review and approval, and \$188,191.37 has been approved by the Court and paid to date.

IV. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE ALLOWED

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

In allowing fees, a court should consider "the time, labor and skill required, but not necessarily that actually expended, in the proper performance of the duties imposed by the court upon the receiver[], the fair value of such time, labor and skill measured by conservative business standards, the degree of activity, integrity and dispatch with which the work is conducted and the result obtained." *United States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted). In practical terms, receiver and professional compensation thus ultimately rests upon the result of an equitable, multi-factor balancing test involving the "economy of administration, the burden that the estate may be able to bear, the amount of time required, although not necessarily expended, and the overall value of the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d 232, 237 (3d Cir. 1970). Regardless of how this balancing test is formulated, no single factor is determinative and "a reasonable fee is based [upon] all circumstances surrounding the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F. Supp. 465, 480 (S.D. Tex. 1974).

As a preliminary matter, the Appointment Order confers on the Receiver substantial duties and powers, including to conduct such investigation and discovery as is necessary to locate and account for all receivership assets, take such action as is necessary and appropriate to assume control over and preserve receivership assets,

1 and employ attorneys and others to investigate and, where appropriate, institute,
2 pursue, and prosecute all claims and causes of action of whatever kind and nature.
3 *See* Appointment Order, Section III.

4 The Receiver promptly determined that experienced, qualified counsel was
5 necessary due to the size and complexity of the receivership estate and the Court
6 agreed, specifically approving Allen Matkins' employment. Dkt. No. 152. The
7 Court also approved the Receiver's proposal to file interim reports and fee
8 applications on a quarterly basis. *Id.*

9 Allen Matkins has submitted a detailed fee application which describes the
10 nature of the services rendered, and the identity and billing rate of each individual
11 performing each task. *See* Exhibit A. Allen Matkins has endeavored to staff matters
12 as efficiently as possible, while remaining cognizant of the complexity of issues.
13 The request for fees is based on Allen Matkins' customary billing rates charged for
14 comparable services provided in other matters, less a 10% discount. In addition, the
15 firm has written off and not charged for 1.10 hours of time (\$673.20) during the
16 Eleventh Application Period.

17 The work performed by Allen Matkins was essential to carrying out the
18 Receiver's Court-ordered duties. The Receiver and Allen Matkins have worked
19 diligently since the Receiver's appointment to preserve and protect the assets of the
20 receivership estate, to investigate potential claims against third parties, and to
21 maximize the funds available for ultimate distribution to investors. Moreover, Allen
22 Matkins seeks payment of only 80% of fees incurred on an interim basis in
23 recognition of the fact that its work in assisting the Receiver is ongoing. Payment of
24 the proposed 20% holdback will be sought at the conclusion of the receivership.
25 Allen Matkins' fees are fair and reasonable and should be approved and paid on an
26 interim basis.

V. CONCLUSION

Allen Matkins therefore respectfully requests this Court enter an Order:

1. Approving Allen Matkins' fees, on an interim basis, of \$95,548.95;
2. Authorizing and directing the Receiver to pay 80% of approved fees, or \$76,439.16, from the assets of the Receivership Entities;
3. Approving Allen Matkins' costs in the amount of \$1,311.46 and authorizing and directing the Receiver to reimburse such costs in full; and
4. For such other and further relief as the Court deems appropriate.

Dated: January 21, 2021

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/ Edward Fates

EDWARD G. FATES
Attorneys for Receiver
THOMAS HEBRANK

EXHIBIT A

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12/23/20 10:55:54 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward
(Ted)

Matter #: 377432.00002

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

Date of Last Billing: 12/03/20

Matter Name: General Receivership

Proforma Number: 1066777

Client/Matter Joint Group # 377432-1

Fees for Matter 377432.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/13/20	8145369	Address issues re: subpoena for deposition and document production issued to Receiver by remaining defendants	Fates, Edward (Ted)	0.30	183.60	183.60	WO	HD	TR
07/13/20	8147671	Review email/subpoenas for records, deposition of the Receiver and emails to counsel and Receiver (.7). Follow-up to evaluate scope of production, prior work, analysis of approach to production, call with counsel (1.2).	Zaro, David	1.90	1,530.45	1,714.05	WO	HD	TR
07/14/20	8148243	Email to the Receiver related to subpoenas, document request and response (.4). Assess issues and review emails, follow-up regarding scope of production request and further analysis of Receiver's options (.5).	Zaro, David	0.90	724.95	2,439.00	WO	HD	TR
07/15/20	8148763	Call with SEC counsel related to the discovery, address response to discovery and call with counsel (.4).	Zaro, David	0.40	322.20	2,761.20	WO	HD	TR
07/17/20	8153335	Email with Receiver, call with counsel and follow-up related to the discovery requests (.6). Emails concerning production, assess	Zaro, David	0.90	724.95	3,486.15	WO	HD	TR

12/23/20 10:55:54 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

Fees for Matter 377432.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered response by Receiver and SEC (.3).	Timekeeper	Hours	Fees	Sum	Circle Action			
07/20/20	8153350	Review previous communications related to defendant parties' subpoena, SEC communications related to witness and assess the Receiver's production issues (2.0). Call with Receiver related to the deposition/document request (.3). Call with SEC counsel related to the subpoenas (.3).	Zaro, David	2.60	2,094.30	5,580.45	WO	HD	TR	_____
07/22/20	8158722	Call with counsel related to the third party subpoena (.3). Follow-up emails to Receiver and counsel for defendants related to production/dates (.3).	Zaro, David	0.60	483.30	6,063.75	WO	HD	TR	_____
07/27/20	8160898	Evaluate issues concerning the subpoena, Receiver's obligations/limits, and emails with Receiver to address timing/response/scope (.7). Follow-up on further issues related to the discovery and confer with counsel regarding response (.4). Emails from receiver related to the valuation/policy maturities (.2).	Zaro, David	1.30	1,047.15	7,110.90	WO	HD	TR	_____
07/28/20	8160955	Call with SEC counsel related to the discovery, follow-up to address the scope of production.	Zaro, David	0.40	322.20	7,433.10	WO	HD	TR	_____
07/29/20	8159844	Advise on document production issues re: subpoenas issued to Receiver by remaining defendants	Fates, Edward (Ted)	0.20	122.40	7,555.50	WO	HD	TR	_____
07/29/20	8162272	Respond/email to counsel for individual defendants as to the subpoena/document production issues (.5). Several emails/call with counsel related to discovery (.3).	Zaro, David	0.80	644.40	8,199.90	WO	HD	TR	_____

12/23/20 10:55:54 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

Fees for Matter 377432.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
08/03/20	8168952	Call/email with Receiver counsel related to the taxes/maturities.	Zaro, David	0.40	322.20	8,522.10	WO	HD	TR	_____
08/10/20	8174515	Email related to the discovery from defendants and production of records, assess need for a protective order and follow-up regarding same.	Zaro, David	0.60	483.30	9,005.40	WO	HD	TR	_____
08/14/20	8177908	Review of the subpoena, follow-up on email from the individual defendant's counsel related to to subpoena/testimony (.3). Email to Receiver related to the deposition/production of records (.4).	Zaro, David	0.70	563.85	9,569.25	WO	HD	TR	_____
08/24/20	8183776	Advise on issues re: subpoena issued to Receiver by remaining defendants for deposition and document production	Fates, Edward (Ted)	0.20	122.40	9,691.65	WO	HD	TR	_____
08/24/20	8185965	Review the amended subpoena and discovery requests of individual defendants, follow-up regarding draft email related to discovery requests (.6). Conference/email with counsel related to the discovery and the trial continuance as to the Barry, Cannon, Moody action/deposition continuance (.2).	Zaro, David	0.80	644.40	10,336.05	WO	HD	TR	_____
08/25/20	8186023	Work on the document production, and the email to/from the Receiver related to the deposition (.4). Follow-up email to counsel/defendants related to deposition/documents and continuance (.4).	Zaro, David	0.80	644.40	10,980.45	WO	HD	TR	_____
08/26/20	8188748	Emails with defendants Barry, Cannon, and Moody related to the subpoena/deposition.	Zaro, David	0.40	322.20	11,302.65	WO	HD	TR	_____

12/23/20 10:55:54 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

Fees for Matter 377432.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
09/02/20	8200819	Follow-up with Receiver and counsel regarding subpoena for deposition, follow-up to address response.	Zaro, David	0.40	322.20	11,624.85	WO	HD	TR	_____
09/16/20	8206685	High level review of Receiver's tax summary	Kraus, Katherine	0.80	536.40	12,161.25	WO	HD	TR	_____
09/16/20	8207293	Several emails/call with tax counsel as to tax returns and preliminary analysis.	Zaro, David	0.40	322.20	12,483.45	WO	HD	TR	_____
09/29/20	8218487	TCs and emails with Livia Benjamin and Receiver re. tax issues	Kraus, Katherine	1.80	1,206.90	13,690.35	WO	HD	TR	_____
09/30/20	8220581	Email re. 2019 tax returns and loss carrybacks.	Kraus, Katherine	0.20	134.10	13,824.45	WO	HD	TR	_____
09/30/20	8223446	Several emails/call to address tax counsel's advice and coordination of tax work.	Zaro, David	0.30	241.65	14,066.10	WO	HD	TR	_____
09/30/20	8223457	Conference with tax counsel related to the ongoing issues with regard to the tax returns/strategy and coordination with tax accountants.	Zaro, David	0.40	322.20	14,388.30	WO	HD	TR	_____

Disbursements for Matter 377432.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
07/01/20	2655692	EDISC – CS Disco, Inc. - Monthly Hosting for July 2020	0.00	150.00	WO	HD	TR	_____
07/07/20	2662594	DCSRCH – Document Search - - PACER - 04/20 -6/20 Usage	0.00	1.20	WO	HD	TR	_____
07/07/20	2662595	DCSRCH – Document Search - - PACER - 04/20 -6/20 Usage	0.00	5.20	WO	HD	TR	_____

12/23/20 10:55:54 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

Disbursements for Matter 377432.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
07/08/20	2654655	BW – Duplication - Black & White Copies	119.00	11.90	WO	HD	TR	_____
07/08/20	2654656	COLOR – Duplication - Color Copies	39.00	3.90	WO	HD	TR	_____
07/08/20	2658297	POST – Epiq Global - POSTAGE 13 Certified and Return @\$7.80	0.00	101.40	WO	HD	TR	_____
07/09/20	2654726	BW – Duplication - Black & White Copies	82.00	8.20	WO	HD	TR	_____
07/09/20	2654727	COLOR – Duplication - Color Copies	26.00	2.60	WO	HD	TR	_____
07/09/20	2658298	POST – Epiq Global - POSTAGE 9 Certified and Return @\$7.80	0.00	70.20	WO	HD	TR	_____
07/13/20	2654895	BW – Duplication - Black & White Copies	141.00	14.10	WO	HD	TR	_____
07/13/20	2654896	COLOR – Duplication - Color Copies	44.00	4.40	WO	HD	TR	_____
07/13/20	2658299	POST – Epiq Global - POSTAGE 15 Certified and Return @\$7.80	0.00	117.00	WO	HD	TR	_____
07/23/20	2658687	COURTC – CourtCall, LLC - LA Superior Court, Judge Gregory Alacron	0.00	(94.00)	WO	HD	TR	_____
07/23/20	2658688	COURTC – CourtCall, LLC - LA Superior Court - Judge Amy Houge	0.00	(54.00)	WO	HD	TR	_____
08/01/20	2661560	EDISC – CS Disco, Inc. - Monthly Hosting for August 2020	0.00	150.00	WO	HD	TR	_____
08/06/20	2659287	DCSRCH – Case Anywhere LLC - System Access Fee (05/01/2020 - 07/31/2020)	0.00	120.00	WO	HD	TR	_____
08/31/20	2664991	BW – Duplication - Black & White Copies	12.00	1.20	WO	HD	TR	_____
08/31/20	2664992	COLOR – Duplication - Color Copies	2.00	0.20	WO	HD	TR	_____
09/01/20	2666624	EDISC – CS Disco, Inc. - Monthly Hosting for September 2020	0.00	150.00	WO	HD	TR	_____
09/03/20	2667064	FILING – -Stephanie Hanks 001927,COURTS/USDC-CA-C-	0.00	400.00	WO	HD	TR	_____

12/23/20 10:55:54 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

Disbursements for Matter 377432.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
09/04/20	2667943	Fee for filing Summons/Complaint and Initiating Documents MSNGR – Nationwide Legal, LLC - UNITED STATES DISTRICT COURT OF CALIFORNIA - WESTERN DIVISION, DELIVER COURTESY	0.00	77.30	WO	HD	TR	_____
09/14/20	2666374	BW – Duplication - Black & White Copies	152.00	15.20	WO	HD	TR	_____
09/14/20	2666375	COLOR – Duplication - Color Copies	2.00	0.20	WO	HD	TR	_____
09/14/20	2667681	MSNGR – Federal Express - Ship To: Dennis J Kelly, Esq	0.00	23.77	WO	HD	TR	_____
09/14/20	2667682	MSNGR – Federal Express - Ship To: James K Roosa, Esq	0.00	31.49	WO	HD	TR	_____

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	15.00	805.50	12,082.50
001665	Fates, Edward (Ted)	0.70	612.00	428.40
002372	Kraus, Katherine	2.80	670.50	1,877.40
		18.50		\$14,388.30
Subtotal Fees				\$14,388.30
Discount				0.00
Total Fees				14,388.30
Total Disbursements				1,311.46

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

Account Summary – As Of 12/23/20

12/23/20 10:55:54 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	31,278.60	31,278.60	0.00	35,132.01	32,197.95	2,934.06	15,699.76	14,388.30	1,311.46
Unbilled Adj	0.00	0.00	0.00	689.54	0.54	689.00	700.79	11.79	689.00
Billed	2,541.41	918.81	1,622.60	41,428.20	37,264.95	4,163.25	52,394.85	52,394.85	7,495.28
Collected	2,541.41	918.81	1,622.60	41,428.20	37,264.95	4,163.25	59,890.13	52,394.85	7,495.28
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	31,785.90	31,278.60	507.30						
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 PWCG Trust
c/o E3 Advisors
501 West Broadway, Suite 800
San Diego, CA 92101

}

12/23/20 10:55:55 PROFORMA STATEMENT FOR MATTER 377432.00004 (Thomas C. Hebrank, as Receiver for PWCG) (Reporting)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted)

Matter #: 377432.00004

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

Date of Last Billing: 12/03/20

Matter Name: Reporting

Proforma Number: 1066777

Client/Matter Joint Group # 377432-1

Fees for Matter 377432.00004.(Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/09/20	8200395	Work on Receiver's 10th interim report (1.8) discuss same with Receiver (.3)	Fates, Edward (Ted)	2.10	1,285.20	1,285.20	WO	HD	TR
09/09/20	8201646	Review/revise the draft of the Receiver report, then follow-up with counsel concerning same (.6). Evaluate the status of the taxes/returns and approach to income and impact of recent recovery (.3).	Zaro, David	0.90	724.95	2,010.15	WO	HD	TR
09/14/20	8204124	Meet and confer communications with SEC counsel re: Receiver's 10th interim report	Fates, Edward (Ted)	0.10	61.20	2,071.35	WO	HD	TR
09/22/20	8210862	Meet and confer communications with SEC counsel re: 10th interim report (.1) finalize report (.2)	Fates, Edward (Ted)	0.30	183.60	2,254.95	WO	HD	TR
09/22/20	8213696	Evaluate the draft Receiver Report, follow-up on counsel's email related to further report.	Zaro, David	0.40	322.20	2,577.15	WO	HD	TR

Proforma Summary

12/23/20 10:55:55 PROFORMA STATEMENT FOR MATTER 377432.00004 (Thomas C. Hebrank, as Receiver for PWCG) (Reporting)

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	1.30	805.50	1,047.15
001665	Fates, Edward (Ted)	2.50	612.00	1,530.00
		<u>3.80</u>		<u>\$2,577.15</u>
Subtotal Fees				\$2,577.15
Discount				0.00
Total Fees				2,577.15
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: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

Account Summary – As Of 12/23/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	4,413.15	4,413.15	0.00	13,634.55	13,634.55	0.00	2,577.15	2,577.15	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	9,221.40	9,221.40	0.00	18,332.55	18,332.55	0.00	34,039.80	34,039.80	0.00
Collected	9,221.40	9,221.40	0.00	18,332.55	18,332.55	0.00	34,039.80	34,039.80	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	4,413.15	4,413.15	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

12/23/20 10:55:55 PROFORMA STATEMENT FOR MATTER 377432.00004 (Thomas C. Hebrank, as Receiver for PWCG) (Reporting)

Billing Address

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

}

12/23/20 10:55:56 PROFORMA STATEMENT FOR MATTER 377432.00005 (Thomas C. Hebrank, as Receiver for PWCG) (Operations & Asset Sales)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward
(Ted)

Matter #: 377432.00005

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

Date of Last Billing: 12/03/20

Matter Name: Operations & Asset Sales

Proforma Number: 1066777

Client/Matter Joint Group # 377432-1

Fees for Matter 377432.00005.(Operations & Asset Sales)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/07/20	8141050	Analyze issues re: updated LE reports and reevaluation of portfolio of policies	Fates, Edward (Ted)	0.30	183.60	183.60	WO	HD	TR
07/09/20	8143197	Discuss issues re: policy maturities, LE reports and valuations, cash flow and distributions with Receiver	Fates, Edward (Ted)	0.40	244.80	428.40	WO	HD	TR
07/09/20	8144530	Emails to Receiver and counsel concerning the maturities (.3). Evaluate impact of recent recovery upon the Clear Life/ITM, Twenty First/LE, cash flow and next steps (.4). Conference call with Receiver and counsel related to the approach to the assets, accounting and impact on reserves and prospective disposition (.4).	Zaro, David	1.10	886.05	1,314.45	WO	HD	TR
08/03/20	8167104	Discuss tax issues re: policy maturities with Receiver	Fates, Edward (Ted)	0.20	122.40	1,436.85	WO	HD	TR
08/24/20	8183689	Discuss issues re: policy maturities, updated LE reports and evaluation of portfolio with Receiver	Fates, Edward (Ted)	0.20	122.40	1,559.25	WO	HD	TR

12/23/20 10:55:56 PROFORMA STATEMENT FOR MATTER 377432.00005 (Thomas C. Hebrank, as Receiver for PWCG) (Operations & Asset Sales)

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	1.10	805.50	886.05
001665	Fates, Edward (Ted)	1.10	612.00	673.20
		<u>2.20</u>		<u>\$1,559.25</u>
Subtotal Fees				\$1,559.25
Discount				0.00
Total Fees				1,559.25
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL	() Hold
() BILL FEES ONLY	() Write Off
() BILL COST ONLY	() <u>Transfer All</u>

Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

Account Summary – As Of 12/23/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,987.65	1,987.65	0.00	12,247.65	12,247.65	0.00	1,559.25	1,559.25	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.09	0.09	0.00
Billed	10,260.00	10,260.00	0.00	24,628.95	24,628.95	0.00	122,189.04	122,189.04	0.00
Collected	10,260.00	10,260.00	0.00	24,628.95	24,628.95	0.00	122,189.04	122,189.04	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	1,987.65	1,987.65	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									

12/23/20 10:55:56 PROFORMA STATEMENT FOR MATTER 377432.00005 (Thomas C. Hebrank, as Receiver for PWCG) (Operations & Asset Sales)

Client Trust **0.00**
Balance

Billing Address

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

}

12/23/20 10:55:58 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward
(Ted)

Matter #: 377432.00006

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

Date of Last Billing: 12/03/20

Matter Name: Claims & Distributions

Proforma Number: 1066777

Client/Matter Joint Group # 377432-1

Fees for Matter 377432.00006.(Claims & Distributions)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/02/20	8139081	Advise A. Herren on unique issues re: investor net losses and claim amounts	Fates, Edward (Ted)	0.20	122.40	122.40	WO	HD	TR
07/07/20	8143502	Evaluate the issues concerning the claims process, Broad River claim, advice to counsel (.4). Call with counsel related to Notices to claimants and bar date (.2). Emails Receiver related to claims notices/Broad River (.3).	Zaro, David	0.90	724.95	847.35	WO	HD	TR
07/07/20	8143503	Work with counsel/Receiver related to distribution accounting/LE's and budgeting analysis based on LE's updated.	Zaro, David	0.60	483.30	1,330.65	WO	HD	TR
07/15/20	8148392	Analyze unique investor claim issues and communications with Receiver and A. Herren re: same	Fates, Edward (Ted)	1.10	673.20	2,003.85	WO	HD	TR
07/17/20	8149308	Analyze issues re: W. Bemis claims (.4) call with W. Bemis re: same (.4) communications with Receiver and A. Herren re: same (.3)	Fates, Edward (Ted)	1.10	673.20	2,677.05	WO	HD	TR

12/23/20 10:55:58 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

Fees for Matter 377432.00006.(Claims & Distributions)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/17/20	8153291	Emails/conference with counsel to assess the approach to investor claims arising out of non-trust investment claims.	Zaro, David	0.60	483.30	3,160.35	WO	HD	TR
07/20/20	8150503	Advise Receiver on issues re: physical threats made by investor with disputed claim	Fates, Edward (Ted)	0.20	122.40	3,282.75	WO	HD	TR
07/29/20	8162277	Email concerning Receiver's analysis of cash flow and possible interim distribution, timing of surplus and call with counsel (.4).	Zaro, David	0.40	322.20	3,604.95	WO	HD	TR
07/30/20	8160767	Advise A. Herren on issues re: disputed investor claims	Fates, Edward (Ted)	0.40	244.80	3,849.75	WO	HD	TR
08/04/20	8170963	Email from counsel for Cook Street/Broad River claim, follow-up with Receiver (.4). Emails with counsel and research issues related to Broad River claim (.5).	Zaro, David	0.90	724.95	4,574.70	WO	HD	TR
08/05/20	8170983	Follow-up to review the Broad River claim documents and communications, prepare for conference with Broad River counsel.	Zaro, David	0.80	644.40	5,219.10	WO	HD	TR
08/06/20	8171414	Follow-up on the claims related to Cook Street, review record/emails (.2).	Zaro, David	0.20	161.10	5,380.20	WO	HD	TR
08/07/20	8170927	Analyze response to claims letter from counsel for spouse of deceased claimant	Fates, Edward (Ted)	0.30	183.60	5,563.80	WO	HD	TR
08/07/20	8171861	Research, contract analysis and work on the analysis of the Cook Street, PWCG, Trust contract, and claims issues.	Zaro, David	0.70	563.85	6,127.65	WO	HD	TR
08/10/20	8171830	Analyze and advise on BroadRiver claim issues (.3) analyze issues re: D. Robinson	Fates, Edward (Ted)	1.30	795.60	6,923.25	WO	HD	TR

12/23/20 10:55:58 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

Fees for Matter 377432.00006.(Claims & Distributions)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
		claim and correspondence from counsel (.3) communications with counsel for D. Robinson (.5) discuss same with Receiver and A. Herren (.2)							
08/10/20	8174509	Conference with Receiver counsel related to the strategy concerning claimants/Broad River related to Calhoun payments (.3). Email wit counsel for Broad River related to the claims (.6).	Zaro, David	0.90	724.95	7,648.20	WO	HD	TR
08/11/20	8173188	Analyze issues re: claim of J. Pelayo and dispute as to claim (.3) communications with A. Herren (.2) call/emails with J. Pelayo (.9) advise on issues re: BroadRiver claim dispute (.4)	Fates, Edward (Ted)	1.80	1,101.60	8,749.80	WO	HD	TR
08/11/20	8175535	Call with counsel related to the accounting/calculation of losses to investors.	Zaro, David	0.40	322.20	9,072.00	WO	HD	TR
08/11/20	8175537	Assess issues related to the Cook Street claim and related claims concerning PWCG, Inc./Calhoun investors (.4). Attend conference call with counsel for broad River (.5). Follow-up call with counsel to address the disputed claims/strategy and approach (.4).	Zaro, David	1.30	1,047.15	10,119.15	WO	HD	TR
08/14/20	8176712	Revisions to monthly case update to investors (.2) discuss analysis of investor claims with Receiver (.3)	Fates, Edward (Ted)	0.50	306.00	10,425.15	WO	HD	TR
08/17/20	8180170	Call from investor claimant related to the claims process and next steps (.4). Follow-up o the issues related to disputed claims,	Zaro, David	0.80	644.40	11,069.55	WO	HD	TR

12/23/20 10:55:58 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

Fees for Matter 377432.00006.(Claims & Distributions)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		the Broad River discovery and request (.4).								
08/20/20	8181173	Respond to direct investor inquiries re: claims and distributions	Fates, Edward (Ted)	0.30	183.60	11,253.15	WO	HD	TR	_____
08/25/20	8184454	Advise A. Herren on issues relating to investor claim disputes	Fates, Edward (Ted)	0.30	183.60	11,436.75	WO	HD	TR	_____
08/26/20	8186093	Advise A. Herren on issues with analysis of allowed claim amounts and disputed claims	Fates, Edward (Ted)	0.40	244.80	11,681.55	WO	HD	TR	_____
08/31/20	8194494	Several emails, review history/communications concerning Broad River claim, background, accounting issues and advice to Receiver.	Zaro, David	0.70	563.85	12,245.40	WO	HD	TR	_____
09/01/20	8195565	Analyze and advise Receiver re: response to claim asserted by A. Calhoun Jr. (.3) advise on issues re: BroadRiver claim dispute (.2)	Fates, Edward (Ted)	0.50	306.00	12,551.40	WO	HD	TR	_____
09/01/20	8198629	Several issues related to Broad River and address response to document demand.	Zaro, David	0.40	322.20	12,873.60	WO	HD	TR	_____
09/02/20	8196214	Analyze issues re: approach to BroadRiver claim dispute and document production (.2) discuss same with Receiver (.3)	Fates, Edward (Ted)	0.50	306.00	13,179.60	WO	HD	TR	_____
09/02/20	8199277	Evaluate issues related to the Broad River disputes and claims/discovery (.3). Conferences with Receiver and counsel related to the Broad River claims, discovery, strategy (.8).	Zaro, David	1.10	886.05	14,065.65	WO	HD	TR	_____

12/23/20 10:55:58 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

Fees for Matter 377432.00006.(Claims & Distributions)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
09/04/20	8201605	Emails with Receiver and Ms. Herren concerning claims disputes, Receiver response and strategy.	Zaro, David	0.40	322.20	14,387.85	WO	HD	TR	_____
09/09/20	8200528	Revisions to monthly case update to investors, discuss same with Receiver	Fates, Edward (Ted)	0.30	183.60	14,571.45	WO	HD	TR	_____
09/09/20	8201657	Emails from Receiver related to the documents/communications related to the Cook Street/Broad River claims (.6). Call with counsel related to claims process/disputes (.3).	Zaro, David	0.90	724.95	15,296.40	WO	HD	TR	_____
09/10/20	8201265	Analyze and advise A. Herren re: responses to investors re: disputed claim amounts (.6) respond to direct inquiry from investor re: claims process (.2)	Fates, Edward (Ted)	0.80	489.60	15,786.00	WO	HD	TR	_____
09/10/20	8202808	Analysis of the issues and supporting documents related to disputed claims, follow-up emails with counsel and Receiver (1.1). Emails concerning PWCG tax issues (.2).	Zaro, David	1.30	1,047.15	16,833.15	WO	HD	TR	_____
09/11/20	8202228	Analyze BroadRiver claim dispute and request for documents relating to same (.8) discuss same and strategy/approach with Receiver (.9) advise A. Herren on claim issues relating to D. Calhoun (.8)	Fates, Edward (Ted)	2.50	1,530.00	18,363.15	WO	HD	TR	_____
09/11/20	8205125	Assess documents/evaluate accounting documents in preparation for the claims assessment and Broad River meeting with Receiver to assess strategy (.8). Attend meeting with Receiver and counsel related to the claims processing/disputed claims	Zaro, David	2.10	1,691.55	20,054.70	WO	HD	TR	_____

12/23/20 10:55:58 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

Fees for Matter 377432.00006.(Claims & Distributions)

Trans Date	Index	Description of Service Rendered and legal issues regarding Broad River (.9). Draft email to claimant in response to claim issues (.4).	Timekeeper	Hours	Fees	Sum	Circle Action			
09/14/20	8206477	Emails to address Broad River claim issues and the records request (.4). Call with counsel related to claims and processing of disputed claims/review email. (.3).	Zaro, David	0.70	563.85	20,618.55	WO	HD	TR	_____
09/14/20	8206628	Evaluate Plan for distribution; calculation/accounting; the potential tax issue, call with counsel concerning foregoing matters.	Zaro, David	0.40	322.20	20,940.75	WO	HD	TR	_____
09/15/20	8205175	Advise on issues and strategy for disputed investor claims	Fates, Edward (Ted)	0.30	183.60	21,124.35	WO	HD	TR	_____
09/15/20	8207248	Evaluate Paul Momita and Ms. Lindsey claim, emails/ documents and filings, order as to claims (.8). Conference with counsel and draft the response to the Momita/Lindsey claim dispute (.5). Work on the issues related to claims process/disputed claims and application of MIMO/trade dispute (.4).	Zaro, David	1.70	1,369.35	22,493.70	WO	HD	TR	_____
09/21/20	8210282	Advise A. Herren regarding issue concerning ownership/assignment of investor claim	Fates, Edward (Ted)	0.40	244.80	22,738.50	WO	HD	TR	_____
09/23/20	8212158	Analyze issues concerning claim asserted by D. Calhoun (.4) advise Receiver and A. Herren re: same (.3)	Fates, Edward (Ted)	0.70	428.40	23,166.90	WO	HD	TR	_____
09/23/20	8214767	Email concerning the Calhoun claims and preliminary evaluations of the issues (.4).	Zaro, David	0.70	563.85	23,730.75	WO	HD	TR	_____

12/23/20 10:55:58 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

Fees for Matter 377432.00006.(Claims & Distributions)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		Emails and follow-up on claims allowance motion (.3).								
09/24/20	8213178	Analyze and respond to claim dispute asserted by A. Calhoun Jr. (.6) discuss same and list of disputed claims with A. Herren (.5)	Fates, Edward (Ted)	1.10	673.20	24,403.95	WO	HD	TR	_____
09/28/20	8222994	Follow-up with Receiver counsel as to prospective Broad River and other disputed claimants.	Zaro, David	0.30	241.65	24,645.60	WO	HD	TR	_____
09/29/20	8217118	Analyze BroadRiver objection to proposed allowed claim amount and correspondence re: same (.3) analyze issues re: claim dispute and correspondence from counsel from A. Calhoun Jr. (.5) advise Receiver re: same (.3)	Fates, Edward (Ted)	1.10	673.20	25,318.80	WO	HD	TR	_____
09/30/20	8219795	Analyze issues re: A. Calhoun Jr. claim dispute (.3) communications with counsel for A. Calhoun Jr. re: same (.2) update Receiver re: same (.1)	Fates, Edward (Ted)	0.60	367.20	25,686.00	WO	HD	TR	_____
09/30/20	8223351	Emails with counsel, follow-up analysis of the Calhoun claims issues, the letter and insider/MIMO issues.	Zaro, David	0.60	483.30	26,169.30	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	19.80	805.50	15,948.90
001665	Fates, Edward (Ted)	16.70	612.00	10,220.40
		36.50		\$26,169.30
Subtotal Fees				\$26,169.30

12/23/20 10:55:58 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
Discount				0.00
Total Fees				26,169.30
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: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

Account Summary – As Of 12/23/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	69,098.40	69,098.40	0.00	100,009.80	100,009.80	0.00	26,169.30	26,169.30	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	30,911.40	30,911.40	0.00	63,467.55	63,467.55	0.00	96,079.95	96,079.95	0.00
Collected	30,911.40	30,911.40	0.00	63,467.55	63,467.55	0.00	96,079.95	96,079.95	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	69,098.40	69,098.40	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 PWCG Trust c/o E3 Advisors
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12/23/20 10:55:59 PROFORMA STATEMENT FOR MATTER 377432.00007 (Thomas C. Hebrank, as Receiver for PWCG) (Third Party Recoveries)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted)

Matter #: 377432.00007

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

Date of Last Billing: 12/03/20

Matter Name: Third Party Recoveries

Proforma Number: 1066777

Client/Matter Joint Group # 377432-1

Fees for Matter 377432.00007.(Third Party Recoveries)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/02/20	8139439	Advise on strategy and next steps re: clawback letters	Fates, Edward (Ted)	0.30	183.60	183.60	WO	HD	TR
07/06/20	8139942	Communications with Receiver and A. Herren re: clawback claims and associated letters (.3) advise on strategy and approach to investor responses to clawback demands (.6)	Fates, Edward (Ted)	0.90	550.80	734.40	WO	HD	TR
07/06/20	8140924	Confer with counsel regarding finalizing and transmitting clawback letters, and commence transmittal process (.5).	Aspis, Norman	0.50	222.75	957.15	WO	HD	TR
07/07/20	8141258	Advise on revisions to clawback settlements and associated letters	Fates, Edward (Ted)	0.30	183.60	1,140.75	WO	HD	TR
07/07/20	8148313	Review letters to clawback targets and corresponding settlement agreements and stipulated judgments (.5).	Aspis, Norman	0.50	222.75	1,363.50	WO	HD	TR
07/08/20	8166520	Confer with M. Diaz regarding adjustments to clawback letters (.3).	Aspis, Norman	0.30	133.65	1,497.15	WO	HD	TR

12/23/20 10:55:59 PROFORMA STATEMENT FOR MATTER 377432.00007 (Thomas C. Hebrank, as Receiver for PWCG) (Third Party Recoveries)

Fees for Matter 377432.00007.(Third Party Recoveries)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/09/20	8143805	Review and finalize certain letters and settlement agreements for transmittal (.5).	Aspis, Norman	0.50	222.75	1,719.90	WO	HD	TR	_____
07/10/20	8145123	Review clawback letters and finalize the same for transmittal (.4).	Aspis, Norman	0.40	178.20	1,898.10	WO	HD	TR	_____
07/13/20	8166444	Review letters to clawback recipients and confer with M. Diaz regarding transmittal (.7).	Aspis, Norman	0.70	311.85	2,209.95	WO	HD	TR	_____
07/21/20	8153211	Confer with investor representative regarding settlement agreement and demand (.3).	Aspis, Norman	0.30	133.65	2,343.60	WO	HD	TR	_____
07/24/20	8156495	Confer with clawback target and review notes regarding the same (.3).	Aspis, Norman	0.30	133.65	2,477.25	WO	HD	TR	_____
07/28/20	8159570	Confer with clawback target extensively regarding clawback procedures (.6).	Aspis, Norman	0.60	267.30	2,744.55	WO	HD	TR	_____
07/29/20	8159500	Advise on issues re: clawback claims and settlements	Fates, Edward (Ted)	0.40	244.80	2,989.35	WO	HD	TR	_____
07/30/20	8161807	Confer with counsel regarding clawback targets and teleconference with clawback target (.3).	Aspis, Norman	0.30	133.65	3,123.00	WO	HD	TR	_____
08/06/20	8169702	Discuss approach to clawback demands with Receiver and A. Herren	Fates, Edward (Ted)	0.40	244.80	3,367.80	WO	HD	TR	_____
08/14/20	8177519	Confer with counsel regarding clawback claims letters (.2).	Aspis, Norman	0.20	89.10	3,456.90	WO	HD	TR	_____

12/23/20 10:55:59 PROFORMA STATEMENT FOR MATTER 377432.00007 (Thomas C. Hebrank, as Receiver for PWCG) (Third Party Recoveries)

Fees for Matter 377432.00007.(Third Party Recoveries)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
08/18/20	8183621	Review and revise Excel spreadsheet tracking clawback claims (.2).	Aspis, Norman	0.20	89.10	3,546.00	WO	HD	TR	_____
08/20/20	8181922	Attention to reviewing notes and correspondence from clawback targets and updating tracking chart regarding the same (.3).	Aspis, Norman	0.30	133.65	3,679.65	WO	HD	TR	_____
08/21/20	8183227	Review chart of clawback targets (.1) and confer with clawback target (.3).	Aspis, Norman	0.40	178.20	3,857.85	WO	HD	TR	_____
08/24/20	8183343	Advise on strategy and next steps regarding potential clawback settlements	Fates, Edward (Ted)	0.30	183.60	4,041.45	WO	HD	TR	_____
08/24/20	8185953	Emails to/from investor/conference related to claw back and call with counsel, follow-up regarding same.	Zaro, David	0.60	483.30	4,524.75	WO	HD	TR	_____
08/25/20	8184737	Advise on issues/communications with profiting investor re: clawback claim	Fates, Edward (Ted)	0.40	244.80	4,769.55	WO	HD	TR	_____
08/25/20	8187034	Conference call with several clawback targets; review correspondence from the same, and confer with counsel and Receiver regarding the same (1.4).	Aspis, Norman	1.40	623.70	5,393.25	WO	HD	TR	_____
08/26/20	8186095	Discuss additional clawback claim and info re: same with A. Herren	Fates, Edward (Ted)	0.20	122.40	5,515.65	WO	HD	TR	_____
08/27/20	8187444	Advise on issues re: additional clawback claim, discuss same with A. Herren	Fates, Edward (Ted)	0.40	244.80	5,760.45	WO	HD	TR	_____
08/27/20	8193125	Teleconference with clawback target regarding settlement (.2); review information regarding amended clawback	Aspis, Norman	0.40	178.20	5,938.65	WO	HD	TR	_____

12/23/20 10:55:59 PROFORMA STATEMENT FOR MATTER 377432.00007 (Thomas C. Hebrank, as Receiver for PWCG) (Third Party Recoveries)

Fees for Matter 377432.00007.(Third Party Recoveries)

Trans Date	Index	Description of Service Rendered target (.2).	Timekeeper	Hours	Fees	Sum	Circle Action			
08/31/20	8191757	Advise on issues regarding additional clawback claim	Fates, Edward (Ted)	0.20	122.40	6,061.05	WO	HD	TR	_____
08/31/20	8192808	Draft and revise certain letters to clawback targets and confer with counsel regarding the same (.9); revise and update tracking chart (.2).	Aspis, Norman	1.10	490.05	6,551.10	WO	HD	TR	_____
09/04/20	8198073	Advise on issues re: settlements of clawback claims	Fates, Edward (Ted)	0.20	122.40	6,673.50	WO	HD	TR	_____
09/04/20	8198976	Confer with A. Herren and counsel regarding clawback efforts (.3).	Aspis, Norman	0.30	133.65	6,807.15	WO	HD	TR	_____
09/10/20	8201685	Advise on issues and strategy for clawback claims and settlements	Fates, Edward (Ted)	0.30	183.60	6,990.75	WO	HD	TR	_____
09/11/20	8204800	Review correspondence from clawback targets and confer with counsel regarding the same (.3).	Aspis, Norman	0.30	133.65	7,124.40	WO	HD	TR	_____
09/14/20	8203513	Advise on strategy and next steps for clawback claims and settlements	Fates, Edward (Ted)	0.60	367.20	7,491.60	WO	HD	TR	_____
09/14/20	8204707	Review and revise clawback tracking spreadsheet (.2); review correspondence from clawback targets (.2); and confer with counsel regarding the same (.4).	Aspis, Norman	0.80	356.40	7,848.00	WO	HD	TR	_____
09/15/20	8206046	Review tracking chart and correspondence from clawback targets (.3).	Aspis, Norman	0.30	133.65	7,981.65	WO	HD	TR	_____

12/23/20 10:55:59 PROFORMA STATEMENT FOR MATTER 377432.00007 (Thomas C. Hebrank, as Receiver for PWCG) (Third Party Recoveries)

Fees for Matter 377432.00007.(Third Party Recoveries)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/16/20	8206474	Advise on strategy and next steps re: clawback settlements	Fates, Edward (Ted)	0.20	122.40	8,104.05	WO	HD	TR
09/17/20	8207868	Confer with counsel regarding clawback targets and review materials regarding the same (.6).	Aspis, Norman	0.60	267.30	8,371.35	WO	HD	TR
09/22/20	8211960	Confer with clawback target regarding settlement agreement (.2).	Aspis, Norman	0.20	89.10	8,460.45	WO	HD	TR
09/25/20	8215960	Confer with counsel regarding outstanding clawback issues (.1).	Aspis, Norman	0.10	44.55	8,505.00	WO	HD	TR
09/28/20	8222740	Confer with A. Herren regarding contact information for B. Berlin (.2).	Aspis, Norman	0.20	89.10	8,594.10	WO	HD	TR
09/29/20	8217223	Work on letter to profiting investor re: settlement of clawback claim and related issues	Fates, Edward (Ted)	0.50	306.00	8,900.10	WO	HD	TR
09/29/20	8222318	Draft letter to B. Berlin and confer with counsel regarding the same (.7).	Aspis, Norman	0.70	311.85	9,211.95	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.60	805.50	483.30
001665	Fates, Edward (Ted)	5.60	612.00	3,427.20
002369	Aspis, Norman	11.90	445.50	5,301.45
		18.10		\$9,211.95
Subtotal Fees				\$9,211.95
Discount				0.00
Total Fees				9,211.95
Total Disbursements				0.00

12/23/20 10:55:59 PROFORMA STATEMENT FOR MATTER 377432.00007 (Thomas C. Hebrank, as Receiver for PWCG) (Third Party Recoveries)

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

Account Summary – As Of 12/23/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	35,356.05	35,356.05	0.00	118,602.00	118,602.00	0.00	9,211.95	9,211.95	0.00
Unbilled Adj	0.00	0.00	0.00	2.34	2.34	0.00	2.34	2.34	0.00
Billed	83,243.61	83,243.61	0.00	107,477.91	107,477.91	0.00	108,121.86	108,121.86	0.00
Collected	83,243.61	83,243.61	0.00	107,477.91	107,477.91	0.00	108,121.86	108,121.86	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	35,476.05	35,356.05	120.00						
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 PWCG Trust c/o E3 Advisors 501 West Broadway, Suite 800 San Diego, CA 92101

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12/23/20 10:56:00 PROFORMA STATEMENT FOR MATTER 377432.00008 (Thomas C. Hebrank, as Receiver for PWCG) (Pending Litigation)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward Matter #: 377432.00008 Client Name: Thomas C. Hebrank, as Receiver for PWCG
 (Ted)
 Date of Last Billing: 12/03/20 Matter Name: Pending Litigation
 Proforma Number: 1066777
 Client/Matter Joint Group # 377432-1

Fees for Matter 377432.00008.(Pending Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/21/20	8153375	Review proposed joint status report for case management conference in Shechter case, communications with counsel for putative class re: same (.6) communications with counsel for MPC re: status conference in pending Names case (.5)	Fates, Edward (Ted)	1.10	673.20	673.20	WO	HD	TR
07/22/20	8158723	Review draft of the case management conference Statement (.2). Conference concerning the draft of the case management statement by State Court class action counsel (.3).	Zaro, David	0.50	402.75	1,075.95	WO	HD	TR
08/03/20	8167042	Communications with counsel for MPC re: dismissal of Names action	Fates, Edward (Ted)	0.30	183.60	1,259.55	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.50	805.50	402.75
001665	Fates, Edward (Ted)	1.40	612.00	856.80

12/23/20 10:56:00 PROFORMA STATEMENT FOR MATTER 377432.00008 (Thomas C. Hebrank, as Receiver for PWCG) (Pending Litigation)

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
		1.90		\$1,259.55
Subtotal Fees				\$1,259.55
Discount				0.00
Total Fees				1,259.55
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: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

Account Summary – As Of 12/23/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,932.75	1,932.75	0.00	3,613.95	3,613.95	0.00	1,259.55	1,259.55	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	1,681.20	1,681.20	0.00	13,911.75	13,911.75	0.00	27,495.45	27,495.45	0.00
Collected	1,681.20	1,681.20	0.00	13,911.75	13,911.75	0.00	27,495.45	27,495.45	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	1,932.75	1,932.75	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

12/23/20 10:56:00 PROFORMA STATEMENT FOR MATTER 377432.00008 (Thomas C. Hebrank, as Receiver for PWCG) (Pending Litigation)

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

}

12/23/20 10:56:01 PROFORMA STATEMENT FOR MATTER 377432.00009 (Thomas C. Hebrank, as Receiver for PWCG) (Employment/Fees)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward
(Ted)

Matter #: 377432.00009

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

Date of Last Billing: 12/03/20

Matter Name: Employment/Fees

Proforma Number: 1066777

Client/Matter Joint Group # 377432-1

Fees for Matter 377432.00009.(Employment/Fees)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
07/01/20	8137677	Revisions to Receiver's 9th interim fee application (.4) communications with counsel for MPC re: Q1 2020 fee application (.1)	Fates, Edward (Ted)	0.50	306.00	306.00	WO	HD	TR
07/07/20	8141158	Meet and confer communications with SEC counsel re: 9th interim fee applications	Fates, Edward (Ted)	0.20	122.40	428.40	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.70	612.00	428.40
		0.70		\$428.40
Subtotal Fees				\$428.40
Discount				0.00
Total Fees				428.40
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL

() Hold

12/23/20 10:56:01 PROFORMA STATEMENT FOR MATTER 377432.00009 (Thomas C. Hebrank, as Receiver for PWCG) (Employment/Fees)

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

Billing Instructions

expires 6/30/2021: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

Account Summary – As Of 12/23/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,468.80	1,468.80	0.00	3,818.70	3,818.70	0.00	428.40	428.40	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	2,349.90	2,349.90	0.00	2,349.90	2,349.90	0.00	2,349.90	2,349.90	0.00
Collected	2,349.90	2,349.90	0.00	2,349.90	2,349.90	0.00	2,349.90	2,349.90	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	1,468.80	1,468.80	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 PWCG Trust
c/o E3 Advisors
501 West Broadway, Suite 800
San Diego, CA 92101

}

12/23/20 10:56:03 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward
(Ted)

Matter #: 377432.00011

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

Date of Last Billing:

Matter Name: MP&C Litigation

Proforma Number: 1066777

Client/Matter Joint Group # 377432-1

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	WO	HD	TR	Circle Action
07/01/20	8141382		Zaro, David	1.10	886.05	886.05	WO	HD	TR	_____
07/06/20	8143437		Zaro, David	0.30	241.65	1,127.70	WO	HD	TR	_____
07/16/20	8150939		Zaro, David	0.30	241.65	1,369.35	WO	HD	TR	_____
07/21/20	8154498		Zaro, David	0.50	402.75	1,772.10	WO	HD	TR	_____
07/27/20	8157002		Fates, Edward (Ted)	0.20	122.40	1,894.50	WO	HD	TR	_____

12/23/20 10:56:03 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/27/20	8160912		Zaro, David	1.10	886.05	2,780.55	WO	HD	TR	_____
07/27/20	8163167		Hsu, Tim	0.50	272.25	3,052.80	WO	HD	TR	_____
07/30/20	8162414		Zaro, David	0.60	483.30	3,536.10	WO	HD	TR	_____
07/31/20	8166123		Zaro, David	0.50	402.75	3,938.85	WO	HD	TR	_____
08/07/20	8170835		Fates, Edward (Ted)	0.40	244.80	4,183.65	WO	HD	TR	_____
08/07/20	8171860		Zaro, David	1.60	1,288.80	5,472.45	WO	HD	TR	_____
08/11/20	8173462		Fates, Edward (Ted)	0.40	244.80	5,717.25	WO	HD	TR	_____

12/23/20 10:56:03 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/11/20	8175531		Zaro, David	3.60	2,899.80	8,617.05	WO	HD	TR	_____
08/12/20	8176947		Zaro, David	2.90	2,335.95	10,953.00	WO	HD	TR	_____
08/13/20	8177763		Zaro, David	2.80	2,255.40	13,208.40	WO	HD	TR	_____
08/25/20	8186026		Zaro, David	1.20	966.60	14,175.00	WO	HD	TR	_____
08/26/20	8188756		Zaro, David	3.10	2,497.05	16,672.05	WO	HD	TR	_____
08/27/20	8187480		Fates, Edward (Ted)	2.40	1,468.80	18,140.85	WO	HD	TR	_____

12/23/20 10:56:03 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
08/27/20	8188770		Zaro, David	2.70	2,174.85	20,315.70	WO	HD	TR	_____
08/28/20	8188806		Zaro, David	1.40	1,127.70	21,443.40	WO	HD	TR	_____
08/31/20	8194486		Zaro, David	1.20	966.60	22,410.00	WO	HD	TR	_____
09/01/20	8194564		Fates, Edward (Ted)	0.50	306.00	22,716.00	WO	HD	TR	_____
09/01/20	8198630		Zaro, David	0.60	483.30	23,199.30	WO	HD	TR	_____
09/02/20	8196138		Fates, Edward (Ted)	0.80	489.60	23,688.90	WO	HD	TR	_____

12/23/20 10:56:03 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
09/02/20	8199338		Zaro, David	1.20	966.60	24,655.50	WO	HD	TR	_____
09/03/20	8196893		Fates, Edward (Ted)	0.60	367.20	25,022.70	WO	HD	TR	_____
09/03/20	8201596		Zaro, David	1.70	1,369.35	26,392.05	WO	HD	TR	_____
09/04/20	8197586		Fates, Edward (Ted)	0.40	244.80	26,636.85	WO	HD	TR	_____
09/04/20	8201607		Zaro, David	1.80	1,449.90	28,086.75	WO	HD	TR	_____
09/08/20	8199273		Fates, Edward (Ted)	0.90	550.80	28,637.55	WO	HD	TR	_____
09/08/20	8201630		Zaro, David	2.60	2,094.30	30,731.85	WO	HD	TR	

12/23/20 10:56:03 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
09/09/20	8200273		Fates, Edward (Ted)	0.80	489.60	31,221.45	WO	HD	TR	_____
09/09/20	8201656		Zaro, David	0.90	724.95	31,946.40	WO	HD	TR	_____
09/10/20	8201829		Fates, Edward (Ted)	0.20	122.40	32,068.80	WO	HD	TR	_____
09/10/20	8202812		Zaro, David	1.50	1,208.25	33,277.05	WO	HD	TR	_____
09/11/20	8205127		Zaro, David	0.80	644.40	33,921.45	WO	HD	TR	_____
09/14/20	8203976		Fates, Edward (Ted)	0.30	183.60	34,105.05	WO	HD	TR	_____

12/23/20 10:56:03 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
09/14/20	8206632		Zaro, David	0.40	322.20	34,427.25	WO	HD	TR	_____
09/15/20	8207250		Zaro, David	0.70	563.85	34,991.10	WO	HD	TR	_____
09/16/20	8206421		Fates, Edward (Ted)	0.20	122.40	35,113.50	WO	HD	TR	_____
09/18/20	8208070		Fates, Edward (Ted)	0.60	367.20	35,480.70	WO	HD	TR	_____
09/18/20	8212716		Zaro, David	1.30	1,047.15	36,527.85	WO	HD	TR	_____
09/21/20	8209477		Fates, Edward (Ted)	0.50	306.00	36,833.85	WO	HD	TR	_____
09/21/20	8212810		Zaro, David	1.20	966.60	37,800.45	WO	HD	TR	_____

12/23/20 10:56:03 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
09/23/20	8212162		Fates, Edward (Ted)	0.60	367.20	38,167.65	WO	HD	TR	_____
09/24/20	8220117		Zaro, David	0.40	322.20	38,489.85	WO	HD	TR	_____
09/30/20	8219862		Fates, Edward (Ted)	0.70	428.40	38,918.25	WO	HD	TR	_____
09/30/20	8222194		Aspis, Norman	0.70	311.85	39,230.10	WO	HD	TR	_____
09/30/20	8223364		Zaro, David	0.90	724.95	39,955.05	WO	HD	TR	_____

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	40.90	805.50	32,944.95
001665	Fates, Edward (Ted)	10.50	612.00	6,426.00
002055	Hsu, Tim	0.50	544.50	272.25
002369	Aspis, Norman	0.70	445.50	311.85

12/23/20 10:56:03 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
		52.60		\$39,955.05
Subtotal Fees				\$39,955.05
Discount				0.00
Total Fees				39,955.05
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: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

Account Summary – As Of 12/23/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	57,212.10	57,212.10	0.00	57,212.10	57,212.10	0.00	39,955.05	39,955.05	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	57,212.10	57,212.10	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address