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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.  
24

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

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

Date: October 18, 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 twelfth interim application for approval and  
4 payment of fees and reimbursement of expenses ("Application"). This Application  
5 covers the period from April 1, 2021, through June 30, 2021 ("Fourteenth  
6 Application Period"), and seeks interim approval of \$37,010.70 in fees and  
7 \$2,754.35 in expenses, and an order authorizing the Receiver to pay, on an interim  
8 basis, 80% of the fees incurred (\$29,608.56) 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

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

3 **II. FEE APPLICATION**

4 This fee application should be read in conjunction with the Receiver's  
5 Fourteenth Interim Report ("Fourteenth Report") filed on August 5, 2021 (Dkt.  
6 No. 428), which describes in detail the Receiver's activities during the Fourteenth  
7 Application Period. This Application seeks interim approval of \$37,010.70 in fees  
8 for a total of 65.30 hours worked, and payment on an interim basis of 80% of that  
9 amount, or \$29,608.56. The work performed is described task-by-task on Exhibit A  
10 and is broken down into the following categories:

11

Category	Hours	Amount
General Receivership	0.60	\$442.8
Reporting	2.30	\$1,407.60
Claims & Distributions	4.90	\$3,095.55
Third Party Recoveries	11.90	\$5,634.45
Employment/Fees	1.70	\$1,040.40
MP&C Litigation	43.90	\$25,389.90
Total	65.30	\$37,010.70

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

23 **III. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED**

24 **A. Categories and Descriptions of Work**

25 1. General Receivership

26 Work in this category focused on assisting the Receiver in analyzing tax  
27 issues related to the insurance policies held by the receivership estate and the  
28

1 interim distribution checks issued to investors (as approved by the Court). The  
2 reasonable and necessary fees for work in this category total \$442.80.

3           2.     Reporting

4           Allen Matkins' time in this category focused on preparing the Receiver's  
5 Thirteenth Interim Report. Dkt. 399. The report contains detailed descriptions of  
6 the Receiver's activities during the fourth quarter of 2020, policy maturities, investor  
7 communications, pending litigation, tax issues, and post-receivership receipts and  
8 disbursements. The report also includes the Receiver's recommendations for the  
9 continued administration of the receivership estate. The reasonable and necessary  
10 fees for work in this category total \$1,407.60.

11           3.     Claims and Distributions

12           Allen Matkins' time in this category focused on assisting the Receiver in  
13 implementing the Court-approved interim distribution of receivership estate funds.  
14 Allen Matkins also addressed the request of an investor to assign a claim against the  
15 receivership estate to another investor. The firm also assisted the Receiver in  
16 preparing content for the receivership website, including answers to frequently  
17 asked questions and monthly case updates, and assisted in addressing unique  
18 investor inquiries. The reasonable and necessary fees for work in this category total  
19 \$3,095.55.

20           4.     Third Party Recoveries

21           Allen Matkins' work in this category focused on assisting the Receiver in  
22 formulating demand letters and proposed settlement agreements, which were sent to  
23 investors who received profits from their investments in PWCG Trust. The  
24 Receiver, with Allen Matkins' assistance, has already reached several settlements of  
25 these claims, which have already generated over \$198,000 in recoveries for the  
26 receivership estate. The Receiver's motion to approve certain clawback settlements  
27 was approved by the Court on January 14, 2020. Dkt. 384. The Receiver has been  
28 working to reach other settlements and his motion to approve two additional

1 settlements is pending. Dkt. 427. The reasonable and necessary fees for work in  
2 this category total \$5,634.45.

3           5.     Employment/Fees

4           Although fee applications are a necessary component of federal equity  
5 receiverships, neither the Receiver nor his professionals charge for time spent  
6 preparing their own detailed applications. Allen Matkins assisted the Receiver in  
7 preparing his fee application and with meeting and conferring with counsel for the  
8 SEC regarding the fee applications. Dkt. 330. The reasonable and necessary fees  
9 for work in this category total \$1,040.40.

10           6.     MP&C Litigation<sup>1</sup>

11           Allen Matkins' time in this category focused on the Receiver's claims against  
12 Mills Potoczak & Company ("MPC") on behalf of PWCG Trust (the Receiver's  
13 Complaint against MPC was previously filed on September 3, 2020). The firm  
14 assisted the Receiver in preparing and propounding written discovery requests  
15 (including Requests for Production of Documents, Interrogatories, and Requests for  
16 Admissions), reviewing MPC's discovery responses, and addressing deficiencies in  
17 MPC's responses, including through meet and confer communications with MPC's  
18 counsel.

19           The Receiver, the investor-plaintiffs and MPC have agreed to attend  
20 mediation with the Hon. Carl West (Ret.) of JAMS, although the mediation was  
21 recently postponed to give MPC time to work on resolving coverage issues with one  
22 of its insurance carriers. Allen Matkins has communicated with counsel for MPC  
23 and counsel for the investor-plaintiffs regarding the MPC insurance coverage,  
24 settlement, and mediation issues. The reasonable and necessary fees for work in this  
25 category total \$25,389.90.

26 \_\_\_\_\_  
27 <sup>1</sup> 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.

**B. Summary of Expenses Requested for Reimbursement**

Allen Matkins requests the Court approve reimbursement of \$2,754.35 in out-of-pocket costs. The itemization of such expenses is summarized below by category.

<b>Category</b>	<b>Total</b>
E-Discovery	\$2,591.88
Document Searches (incl. PACER, Lexis, Sec. of State)	\$137.70
Duplication	\$4.20
Postage/FedEx	\$20.57
<b>TOTAL</b>	<b>\$2,754.35</b>

**FEES AND COSTS INCURRED AND PAID TO DATE**

From inception of the receivership through June 30, 2021, the Receiver incurred fees and costs of \$476,437.80, of which amount \$89,668.62 is subject to holdback pending approval of the Receiver's final fee application at the conclusion of the receivership, \$24,563.73 is awaiting the Court's review and approval, and \$362,205.45 has been approved by the Court and paid to date. During the same time period, Allen Matkins has incurred fees and costs of \$1,089,890.66, of which amount \$215,163.90 is subject to holdback pending approval of Allen Matkins' final fee application at the conclusion of the receivership, \$36,362.91 is awaiting the Court's review and approval, and \$842,363.85 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

1 discretion of the Court. See *SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992)  
2 (rev'd in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).

3 In allowing fees, a court should consider "the time, labor and skill required,  
4 but not necessarily that actually expended, in the proper performance of the duties  
5 imposed by the court upon the receiver[], the fair value of such time, labor and skill  
6 measured by conservative business standards, the degree of activity, integrity and  
7 dispatch with which the work is conducted and the result obtained." *United States v.*  
8 *Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks  
9 omitted). In practical terms, receiver and professional compensation thus ultimately  
10 rests upon the result of an equitable, multi-factor balancing test involving the  
11 "economy of administration, the burden that the estate may be able to bear, the  
12 amount of time required, although not necessarily expended, and the overall value of  
13 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d 232, 237 (3d Cir.  
14 1970). Regardless of how this balancing test is formulated, no single factor is  
15 determinative and "a reasonable fee is based [upon] all circumstances surrounding  
16 the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*,  
17 374 F. Supp. 465, 480 (S.D. Tex. 1974).

18 As a preliminary matter, the Appointment Order confers on the Receiver  
19 substantial duties and powers, including to conduct such investigation and discovery  
20 as is necessary to locate and account for all receivership assets, take such action as is  
21 necessary and appropriate to assume control over and preserve receivership assets,  
22 and employ attorneys and others to investigate and, where appropriate, institute,  
23 pursue, and prosecute all claims and causes of action of whatever kind and nature.  
24 See Appointment Order, Section III.

25 The Receiver promptly determined that experienced, qualified counsel was  
26 necessary due to the size and complexity of the receivership estate and the Court  
27 agreed, specifically approving Allen Matkins' employment. Dkt. No. 152. The  
28

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

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

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

21 **V. CONCLUSION**

22 Allen Matkins therefore respectfully requests this Court enter an Order:

- 23 1. Approving Allen Matkins' fees, on an interim basis, of \$37,010.70;
- 24 2. Authorizing and directing the Receiver to pay 80% of approved fees, or  
25 \$29,608.56, from the assets of the Receivership Entities;

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1           3.       Approving Allen Matkins' costs in the amount of \$2,754.35 and  
2 authorizing and directing the Receiver to reimburse such costs in full; and

3           4.       For such other and further relief as the Court deems appropriate.  
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5 Dated: September 13, 2021

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

6  
7 By:           /s/ Edward Fates          

EDWARD G. FATES  
Attorneys for Receiver  
THOMAS HEBRANK

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# **EXHIBIT A**

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08/27/21 11:29:24 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: 08/20/21

Matter Name: General Receivership

Proforma Number: 1109282

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		
04/06/21	8407217	Email/call related to several issues regarding taxes, court report and supporting accounting (.3).	Zaro, David	0.30	241.65	241.65	WO	HD	TR	_____
04/14/21	8411607	Email with Hebrank and Benjamin re. tax filing issues.	Kraus, Katherine	0.30	201.15	442.80	WO	HD	TR	_____

**Disbursements for Matter 377432.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt	Circle	Action		
04/01/21	2705919	EDISC – CS Disco, Inc. - Monthly Hosting for April 2021	0.00	150.00	WO	HD	TR	_____
04/01/21	2705984	EDISC – CS Disco, Inc. - Monthly Hosting for April 2021	0.00	727.23	WO	HD	TR	_____
04/01/21	2705990	EDISC – CS Disco, Inc. - Monthly Hosting for April 2021	0.00	150.00	WO	HD	TR	_____
04/16/21	2705057	BW – Duplication - Black & White Copies	14.00	1.40	WO	HD	TR	_____
04/16/21	2712057	POST – Postage - RICOH - 1 large envelope	0.00	1.40	WO	HD	TR	_____
05/01/21	2711194	EDISC – CS Disco, Inc. - Monthly Hosting for May 2021	0.00	482.88	WO	HD	TR	_____

08/27/21 11:29:24 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				
05/01/21	2711215	EDISC – CS Disco, Inc. - Monthly Hosting for May 2021	0.00	150.00	WO	HD	TR	_____
05/01/21	2711264	EDISC – CS Disco, Inc. - Monthly Hosting for May 2021	0.00	150.00	WO	HD	TR	_____
05/06/21	2709337	DCSRCH – Case Anywhere LLC - System Access Fee (2/1/21 - 4/30/21)	0.00	120.00	WO	HD	TR	_____
05/10/21	2719164	DCSRCH – Document Search - - PACER - 1/21 -3/21 Usage	0.00	0.20	WO	HD	TR	_____
05/10/21	2719165	DCSRCH – Document Search - - PACER - 1/21 -3/21 Usage	0.00	8.70	WO	HD	TR	_____
05/10/21	2719166	DCSRCH – Document Search - - PACER - 1/21 -3/21 Usage	0.00	8.40	WO	HD	TR	_____
05/10/21	2719167	DCSRCH – Document Search - - PACER - 1/21 -3/21 Usage	0.00	0.40	WO	HD	TR	_____
05/13/21	2710222	BW – Duplication - Black & White Copies	28.00	2.80	WO	HD	TR	_____
05/13/21	2714282	MSNGR – Federal Express - Ship To: Dennis J Kelly, Esq	0.00	19.17	WO	HD	TR	_____
06/01/21	2716462	EDISC – CS Disco, Inc. - Monthly Hosting for June 2021	0.00	150.00	WO	HD	TR	_____
06/01/21	2716522	EDISC – CS Disco, Inc. - Monthly Hosting for June 2021	0.00	481.77	WO	HD	TR	_____
06/01/21	2716528	EDISC – CS Disco, Inc. - Monthly Hosting for June 2021	0.00	150.00	WO	HD	TR	_____

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.30	805.50	241.65
002372	Kraus, Katherine	0.30	670.50	201.15
		0.60		\$442.80
Subtotal Fees				\$442.80
Discount				0.00
Total Fees				442.80

08/27/21 11:29:24 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
Total Disbursements				2,754.35

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

**Account Summary – As Of 08/27/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,193.40	1,193.40	0.00	26,189.72	22,472.10	3,717.62	3,197.15	442.80	2,754.35
Unbilled Adj	0.00	0.00	0.00	3.24	3.24	0.00	2,116.59	15.03	2,101.56
Billed	21,795.93	20,832.66	963.27	56,768.39	53,883.36	2,885.03	106,278.21	106,278.21	10,380.31
Collected	21,795.93	20,832.66	963.27	56,768.39	53,883.36	2,885.03	116,658.52	106,278.21	10,380.31
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>5,781.49</b>	<b>1,636.20</b>	<b>4,145.29</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 PWCG Trust  
 c/o E3 Advisors  
 501 West Broadway, Suite 800  
 San Diego, CA 92101

}  
 08/27/21 11:29:25 PROFORMA STATEMENT FOR MATTER 377432.00004 (Thomas C. Hebrank, as Receiver for PWCG) (Reporting)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward      Matter #: 377432.00004      Client Name: Thomas C. Hebrank, as Receiver for PWCG  
 (Ted)  
 Date of Last Billing: 08/20/21      Matter Name: Reporting  
 Proforma Number: 1109282  
 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
04/29/21	8426626	Work on Receiver's 13th interim report (1.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.60	979.20	979.20	WO	HD TR
05/05/21	8435014	Revisions to Receiver's 13th interim report (.2) discuss same with Receiver (.1) communications with SEC counsel re: same (.1)	Fates, Edward (Ted)	0.40	244.80	1,224.00	WO	HD TR
05/13/21	8442171	Meet and confer communications with SEC counsel (.1) finalize 13th interim report (.2)	Fates, Edward (Ted)	0.30	183.60	1,407.60	WO	HD TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.30	612.00	1,407.60
		2.30		\$1,407.60
Subtotal Fees				\$1,407.60
Discount				0.00
Total Fees				1,407.60
Total Disbursements				0.00

08/27/21 11:29:25 PROFORMA STATEMENT FOR MATTER 377432.00004 (Thomas C. Hebrank, as Receiver for PWCG) (Reporting)

**Attorney Billing Instructions**

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

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**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

**Account Summary – As Of 08/27/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,282.75	3,282.75	0.00	6,220.35	6,220.35	0.00	1,407.60	1,407.60	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	1,530.00	1,530.00	0.00	5,943.15	5,943.15	0.00	39,982.95	39,982.95	0.00
Collected	1,530.00	1,530.00	0.00	5,943.15	5,943.15	0.00	39,982.95	39,982.95	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 Balance</b>	<b>4,690.35</b>	<b>4,690.35</b>	<b>0.00</b>						
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc Payment</b>	<b>0.00</b>								
<b>Client Trust Balance</b>	<b>0.00</b>								

**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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08/27/21 11:29:26 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: 08/20/21      Matter Name: Claims & Distributions  
 Proforma Number: 1109282  
 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		
04/07/21	8408701	Several emails related to the Broad River distribution.	Zaro, David	0.20	161.10	161.10	WO	HD	TR	_____
04/08/21	8405997	Advise on distribution issues re: Broadriver	Fates, Edward (Ted)	0.20	122.40	283.50	WO	HD	TR	_____
04/08/21	8406120	Analyze issues re: potential transfers of investor claims (.4) respond to inquiry from investor re: same (.3)	Fates, Edward (Ted)	0.70	428.40	711.90	WO	HD	TR	_____
04/12/21	8409083	Revisions to monthly case update for investors	Fates, Edward (Ted)	0.30	183.60	895.50	WO	HD	TR	_____
04/14/21	8413367	Emails related to the distribution, orders and SEC motion.	Zaro, David	0.30	241.65	1,137.15	WO	HD	TR	_____
05/11/21	8439841	Advise Receiver on issues re: potential transfer/assignment of investor claims	Fates, Edward (Ted)	0.20	122.40	1,259.55	WO	HD	TR	_____
05/14/21	8443522	Revisions to monthly case update for investors	Fates, Edward (Ted)	0.30	183.60	1,443.15	WO	HD	TR	_____



08/27/21 11:29:26 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	
05/17/21	8444899	Analyze and advise G. Rodriguez on issues re: IRA administrator fees charged to investors and communications with IRA administrator re: same	Fates, Edward (Ted)	0.40	244.80	1,687.95	WO	HD	TR
05/21/21	8450003	Advise Receiver re: response to investor correspondence re: IRA administrator fees and potential claims re: same (.4) respond to investor re: same (.4)	Fates, Edward (Ted)	0.80	489.60	2,177.55	WO	HD	TR
06/10/21	8471892	Analyze and respond to correspondence from investor re: concerns with IRA administrator	Fates, Edward (Ted)	0.30	183.60	2,361.15	WO	HD	TR
06/14/21	8487436	Revisions to monthly case update to investors	Fates, Edward (Ted)	0.40	244.80	2,605.95	WO	HD	TR
06/18/21	8480472	Respond to inquiry from investor re: distributions	Fates, Edward (Ted)	0.20	122.40	2,728.35	WO	HD	TR
06/28/21	8489297	Advise A. Herren on probate issues relating to death of investor claimant (.2) advise Receiver on investor issues re: Entrust IRA administrator fees (.4)	Fates, Edward (Ted)	0.60	367.20	3,095.55	WO	HD	TR

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.50	805.50	402.75
001665	Fates, Edward (Ted)	4.40	612.00	2,692.80
		4.90		\$3,095.55
Subtotal Fees				\$3,095.55
Discount				0.00
Total Fees				3,095.55
Total Disbursements				0.00

08/27/21 11:29:26 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10
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**Account Summary – As Of 08/27/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,975.95	1,975.95	0.00	20,596.95	20,596.95	0.00	3,095.55	3,095.55	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	6.66	6.66	0.00
Billed	15,525.45	15,525.45	0.00	45,609.21	45,609.21	0.00	141,689.16	141,689.16	0.00
Collected	15,525.45	15,525.45	0.00	45,609.21	45,609.21	0.00	141,689.16	141,689.16	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>5,071.50</b>	<b>5,071.50</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 PWCG Trust  
 c/o E3 Advisors  
 501 West Broadway, Suite 800  
 San Diego, CA 92101

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08/27/21 11:29:28 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: 08/20/21

Matter Name: Third Party Recoveries

Proforma Number: 1109282

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		
04/05/21	8410520	Prepare for and participate in teleconference investor regarding disgorgement (.7).	Aspis, Norman	0.70	311.85	311.85	WO	HD	TR	_____
04/20/21	8431803	Attention to issues in connection with disgorgement efforts, including teleconference with disgorgement target (1).	Aspis, Norman	1.00	445.50	757.35	WO	HD	TR	_____
05/03/21	8437978	Confer with disgorgement target and review tracking chart regarding the same (.4).	Aspis, Norman	0.40	178.20	935.55	WO	HD	TR	_____
05/06/21	8458975	Review disgorgement related correspondence and confer with counsel regarding the same, and update disgorgement tracking chart (.3).	Aspis, Norman	0.30	133.65	1,069.20	WO	HD	TR	_____
05/07/21	8458826	Review disgorgement tracking chart and correspondence regarding disgorgement issues (.5).	Aspis, Norman	0.50	222.75	1,291.95	WO	HD	TR	_____
05/10/21	8438438	Communications with Receiver re: clawback recoveries	Fates, Edward (Ted)	0.20	122.40	1,414.35	WO	HD	TR	_____

08/27/21 11:29:28 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		
05/26/21	8459781	Review disgorgement correspondence with net winner and revise tracking chart (.4).	Aspis, Norman	0.40	178.20	1,592.55	WO	HD	TR	_____
05/27/21	8457060	Advise on next steps re: Keipper clawback settlement and court approval	Fates, Edward (Ted)	0.20	122.40	1,714.95	WO	HD	TR	_____
05/27/21	8459575	Review correspondence with various disgorgement targets and confer with them regarding status of settlements (1.3).	Aspis, Norman	1.30	579.15	2,294.10	WO	HD	TR	_____
05/28/21	8459589	Correspond with disgorgement target and his counsel and prepare motion to approve settlement (2.3).	Aspis, Norman	2.30	1,024.65	3,318.75	WO	HD	TR	_____
06/08/21	8469609	Revisions to motion and supporting declaration for approval of clawback settlement	Fates, Edward (Ted)	0.70	428.40	3,747.15	WO	HD	TR	_____
06/08/21	8494692	Review and revise motion to approve settlement agreement and confer with counsel regarding the same (.4).	Aspis, Norman	0.40	178.20	3,925.35	WO	HD	TR	_____
06/10/21	8474790	Confer with disgorgement target and counsel regarding prospective settlement and revise motion to approve to reflect the same (.8).	Aspis, Norman	0.80	356.40	4,281.75	WO	HD	TR	_____
06/11/21	8475476	Advise on clawback settlements and motion for approval of same	Fates, Edward (Ted)	0.40	244.80	4,526.55	WO	HD	TR	_____
06/16/21	8494847	Confer with disgorgement target regarding prospective settlement and payment (.2).	Aspis, Norman	0.20	89.10	4,615.65	WO	HD	TR	_____

08/27/21 11:29:28 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	
06/17/21	8494884	Further confer with disgorgement target regarding settlement and payment (.2).	Aspis, Norman	0.20	89.10	4,704.75	WO	HD	TR
06/18/21	8494718	Confer with disgorgement target regarding settlement terms and payment instructions and revise motion to approve settlement (1.2).	Aspis, Norman	1.20	534.60	5,239.35	WO	HD	TR
06/24/21	8487538	Advise on next steps re: clawback settlement and motion to approve same	Fates, Edward (Ted)	0.30	183.60	5,422.95	WO	HD	TR
06/25/21	8492006	Confer with disgorgement target regarding prospective settlement (.2).	Aspis, Norman	0.20	89.10	5,512.05	WO	HD	TR
06/29/21	8490367	Advise on next steps re: clawback claims and settlements	Fates, Edward (Ted)	0.20	122.40	5,634.45	WO	HD	TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.00	612.00	1,224.00
002369	Aspis, Norman	9.90	445.50	4,410.45
		11.90		\$5,634.45
Subtotal Fees				\$5,634.45
Discount				0.00
Total Fees				5,634.45
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 |

08/27/21 11:29:28 PROFORMA STATEMENT FOR MATTER 377432.00007 (Thomas C. Hebrank, as Receiver for PWCG) (Third Party Recoveries)

**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

**Account Summary – As Of 08/27/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,910.60	2,910.60	0.00	14,741.55	14,741.55	0.00	5,634.45	5,634.45	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	2.34	2.34	0.00
Billed	6,196.50	6,196.50	0.00	29,910.15	29,910.15	0.00	138,032.01	138,032.01	0.00
Collected	6,196.50	6,196.50	0.00	29,910.15	29,910.15	0.00	138,032.01	138,032.01	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>8,551.55</b>	<b>8,545.05</b>	<b>6.50</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 PWCG Trust  
 c/o E3 Advisors  
 501 West Broadway, Suite 800  
 San Diego, CA 92101

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08/27/21 11:29:29 PROFORMA STATEMENT FOR MATTER 377432.00009 (Thomas C. Hebrank, as Receiver for PWCG) (Employment/Fees)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward      Matter #: 377432.00009      Client Name: Thomas C. Hebrank, as Receiver for PWCG  
 (Ted)  
 Date of Last Billing: 08/20/21      Matter Name: Employment/Fees  
 Proforma Number: 1109282  
 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		
04/05/21	8402876	Finalize Receiver and Duffy fee applications, proposed orders and notice of hearing	Fates, Edward (Ted)	0.40	244.80	244.80	WO	HD	TR	_____
04/07/21	8405274	Communications with Receiver and court clerk re: pending interim fee applications	Fates, Edward (Ted)	0.20	122.40	367.20	WO	HD	TR	_____
05/04/21	8433449	Analyze orders approving fee applications and issues with same (.2) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.30	183.60	550.80	WO	HD	TR	_____
06/15/21	8487439	Revisions to Receiver's 13th fee application (.6) communications with Receiver re: same (.2)	Fates, Edward (Ted)	0.80	489.60	1,040.40	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.70	612.00	1,040.40
		1.70		\$1,040.40
Subtotal Fees				\$1,040.40

08/27/21 11:29:29 PROFORMA STATEMENT FOR MATTER 377432.00009 (Thomas C. Hebrank, as Receiver for PWCG) (Employment/Fees)

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
Discount				0.00
Total Fees				1,040.40
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

**Account Summary – As Of 08/27/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	321.75	321.75	0.00	2,769.75	2,769.75	0.00	1,040.40	1,040.40	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	1,407.60	1,407.60	0.00	2,876.40	2,876.40	0.00	5,226.30	5,226.30	0.00
Collected	1,407.60	1,407.60	0.00	2,876.40	2,876.40	0.00	5,226.30	5,226.30	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>1,362.15</b>	<b>1,362.15</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 PWCG Trust  
c/o E3 Advisors



08/27/21 11:29:29 PROFORMA STATEMENT FOR MATTER 377432.00009 (Thomas C. Hebrank, as Receiver for PWCG) (Employment/Fees)

501 West Broadway, Suite 800  
San Diego, CA 92101

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 08/27/21 11:29:31 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: 08/20/21      Matter Name: MP&C Litigation  
 Proforma Number: 1109282  
 Client/Matter Joint Group # 377432-1

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**Fees for Matter 377432.00011.(MP&C Litigation)**

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/06/21	8403989		Fates, Edward (Ted)	1.70	1,040.40	1,040.40	WO	HD	TR	_____
04/06/21	8407215		Zaro, David	0.40	322.20	1,362.60	WO	HD	TR	_____
04/07/21	8404847		Fates, Edward (Ted)	1.30	795.60	2,158.20	WO	HD	TR	_____
04/07/21	8408697		Zaro, David	1.70	1,369.35	3,527.55	WO	HD	TR	_____

08/27/21 11:29:31 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		
04/08/21	8406176		Fates, Edward (Ted)	0.20	122.40	3,649.95	WO	HD	TR	_____
04/08/21	8408776		Zaro, David	0.40	322.20	3,972.15	WO	HD	TR	_____
04/09/21	8407501		Villagomez, Stacey	0.80	324.00	4,296.15	WO	HD	TR	_____
04/11/21	8407965		Villagomez, Stacey	1.00	405.00	4,701.15	WO	HD	TR	_____
04/12/21	8408226		Fates, Edward (Ted)	0.20	122.40	4,823.55	WO	HD	TR	_____
04/12/21	8408734		Villagomez, Stacey	0.80	324.00	5,147.55	WO	HD	TR	_____
04/12/21	8411596		Zaro, David	0.70	563.85	5,711.40	WO	HD	TR	_____
04/13/21	8410083		Fates, Edward (Ted)	0.30	183.60	5,895.00	WO	HD	TR	_____
04/13/21	8410460		Villagomez, Stacey	1.10	445.50	6,340.50	WO	HD	TR	_____

08/27/21 11:29:31 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		
04/14/21	8410708		Fates, Edward (Ted)	2.20	1,346.40	7,686.90	WO	HD	TR	_____
04/14/21	8411750		Villagomez, Stacey	0.50	202.50	7,889.40	WO	HD	TR	_____
04/14/21	8413365		Zaro, David	0.80	644.40	8,533.80	WO	HD	TR	_____
04/15/21	8412037		Fates, Edward (Ted)	1.30	795.60	9,329.40	WO	HD	TR	_____
04/15/21	8412940		Villagomez, Stacey	0.50	202.50	9,531.90	WO	HD	TR	_____
04/15/21	8412993		Peng, Simona	0.80	241.20	9,773.10	WO	HD	TR	_____
04/15/21	8413390		Zaro, David	0.30	241.65	10,014.75	WO	HD	TR	_____
04/16/21	8413467		Fates, Edward (Ted)	0.80	489.60	10,504.35	WO	HD	TR	_____

08/27/21 11:29:31 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		
04/16/21	8413848		Peng, Simona	0.50	150.75	10,655.10	WO	HD	TR	_____
04/20/21	8415667		Fates, Edward (Ted)	1.70	1,040.40	11,695.50	WO	HD	TR	_____
04/20/21	8418885		Zaro, David	0.80	644.40	12,339.90	WO	HD	TR	_____
04/21/21	8417352		Fates, Edward (Ted)	0.40	244.80	12,584.70	WO	HD	TR	_____
04/21/21	8421042		Zaro, David	0.70	563.85	13,148.55	WO	HD	TR	_____
04/23/21	8422380		Zaro, David	0.40	322.20	13,470.75	WO	HD	TR	_____
04/26/21	8422099		Fates, Edward (Ted)	0.50	306.00	13,776.75	WO	HD	TR	_____
04/26/21	8425833		Zaro, David	1.20	966.60	14,743.35	WO	HD	TR	_____

08/27/21 11:29:31 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		
04/28/21	8425157		Fates, Edward (Ted)	0.50	306.00	15,049.35	WO	HD	TR	_____
04/28/21	8425439		Villagomez, Stacey	0.40	162.00	15,211.35	WO	HD	TR	_____
04/29/21	8428606		Villagomez, Stacey	1.00	405.00	15,616.35	WO	HD	TR	_____
04/30/21	8429639		Villagomez, Stacey	1.50	607.50	16,223.85	WO	HD	TR	_____
05/04/21	8434299		Villagomez, Stacey	2.30	931.50	17,155.35	WO	HD	TR	_____
05/05/21	8435039		Fates, Edward (Ted)	0.20	122.40	17,277.75	WO	HD	TR	_____
05/05/21	8435255		Zaro, David	0.20	161.10	17,438.85	WO	HD	TR	_____
05/05/21	8458325		Villagomez, Stacey	2.80	1,134.00	18,572.85	WO	HD	TR	_____
05/06/21	8435546		Fates, Edward (Ted)	1.90	1,162.80	19,735.65	WO	HD	TR	_____
05/06/21	8458351		Villagomez, Stacey	1.50	607.50	20,343.15	WO	HD	TR	_____

08/27/21 11:29:31 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

**Fees for Matter 377432.00011.(MP&C Litigation)**

<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>		
05/12/21	8440998		Fates, Edward (Ted)	0.40	244.80	20,587.95	WO	HD	TR	_____
05/12/21	8441458		Zaro, David	0.60	483.30	21,071.25	WO	HD	TR	_____
05/12/21	8458246		Villagomez, Stacey	0.80	324.00	21,395.25	WO	HD	TR	_____
05/13/21	8442239		Fates, Edward (Ted)	0.10	61.20	21,456.45	WO	HD	TR	_____
05/18/21	8450391		Zaro, David	0.20	161.10	21,617.55	WO	HD	TR	_____
05/19/21	8447928		Fates, Edward (Ted)	0.50	306.00	21,923.55	WO	HD	TR	_____
05/19/21	8450414		Zaro, David	0.40	322.20	22,245.75	WO	HD	TR	_____
06/01/21	8482802		Fates, Edward (Ted)	0.30	183.60	22,429.35	WO	HD	TR	_____
06/08/21	8471007		Zaro, David	0.70	563.85	22,993.20	WO	HD	TR	_____

08/27/21 11:29:31 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&amp;C Litigation)

**Fees for Matter 377432.00011.(MP&C Litigation)**

<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 Action</b>			
06/08/21	8483211		Fates, Edward (Ted)	0.50	306.00	23,299.20	WO	HD	TR	_____
06/09/21	8473705		Zaro, David	0.30	241.65	23,540.85	WO	HD	TR	_____
06/10/21	8473500		Fates, Edward (Ted)	1.50	918.00	24,458.85	WO	HD	TR	_____
06/11/21	8473741		Zaro, David	0.70	563.85	25,022.70	WO	HD	TR	_____
06/29/21	8490000		Fates, Edward (Ted)	0.20	122.40	25,145.10	WO	HD	TR	_____
06/30/21	8493006		Fates, Edward (Ted)	0.40	244.80	25,389.90	WO	HD	TR	_____

**Proforma Summary****Timekeeper**

<b>Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
000313	Zaro, David	10.50	805.50	8,457.75
001665	Fates, Edward (Ted)	17.10	612.00	10,465.20
002307	Peng, Simona	1.30	301.50	391.95



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**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
002336	Villagomez, Stacey	15.00	405.00	6,075.00
		43.90		\$25,389.90
Subtotal Fees				\$25,389.90
Discount				0.00
Total Fees				25,389.90
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

**Account Summary – As Of 08/27/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	12,474.90	12,474.90	0.00	68,588.55	68,588.55	0.00	25,389.90	25,389.90	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	30,723.75	30,723.75	0.00	111,629.25	111,629.25	0.00	111,629.25	111,629.25	0.00
Collected	30,723.75	30,723.75	0.00	111,629.25	111,629.25	0.00	111,629.25	111,629.25	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>37,864.80</b>	<b>37,864.80</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>									

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**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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