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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

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

Date: September 12, 2022
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 seventeenth interim application for approval and
4 payment of fees and reimbursement of expenses ("Application"). This Application
5 covers the period from January 1, 2022, through March 31, 2022 ("Seventeenth
6 Application Period"), and seeks interim approval of \$174,879.45 in fees and
7 \$7,319.29 in expenses, and an order authorizing the Receiver to pay, on an interim
8 basis, 80% of the fees incurred (\$139,903.56) 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

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 Seventeenth Interim Report ("Sixteenth Report") filed on May 17, 2022 (Dkt. No. 481), which describes in detail the Receiver's activities during the Seventeenth Application Period. This Application seeks interim approval of \$174,879.45 in fees for a total of 250.00 hours worked, and payment on an interim basis of 80% of that amount, or \$139,903.56. The work performed is described task-by-task on Exhibit A and is broken down into the following categories:

Category	Hours	Amount
General Receivership	9.10	\$5,994.45
Reporting	7.30	\$5,645.70
Claims & Distributions	0.20	\$128.70
Employment/Fees	2.10	\$1,525.50
MP&C Litigation	231.30	\$161,585.10
Total	250.00	\$174,879.45

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

Allen Matkins' time in this category focused on assisting and advising the Receiver regarding the production of documents in response to subpoenas issued to

1 the Receiver and his servicing agent (ITM TwentyFirst) by the remaining
2 Defendants in the case, including addressing confidential information contained on
3 documents produced through a protective order. The reasonable and necessary fees
4 for work in this category total \$5,994.45.

5 2. Reporting

6 Allen Matkins' time in this category focused on preparing the Receiver's
7 Sixteenth Interim Report. Dkt. 455. The report contains detailed descriptions of the
8 Receiver's activities during the third quarter of 2021, policy maturities, investor
9 communications, pending litigation, tax issues, and post-receivership receipts and
10 disbursements. The report also includes the Receiver's recommendations for the
11 continued administration of the receivership estate. Attorney David Zaro also
12 attended the hearing held by the Court on February 7, 2022. The reasonable and
13 necessary fees for work in this category total \$5,645.70.

14 3. Claims & Distributions

15 Allen Matkins assisted the Receiver in addressing issues relating to the death
16 of an investor claimant and the change to the holder of the claim to the
17 representative of his probate estate. The reasonable and necessary fees for work in
18 this category total \$128.70.

19 4. Employment/Fees

20 Although fee applications are a necessary component of federal equity
21 receiverships, Allen Matkins does not charge any time for preparing its own fee
22 applications. The firm assisted the Receiver and his tax accountants, Duffy
23 Kruspodin, in preparing their fee applications, and attorney David Zaro attended the
24 hearing held on February 14, 2022. The reasonable and necessary fees for work in
25 this category total \$1,525.50.

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1 5. MP&C Litigation¹

2 The vast majority of Allen Matkins' work during the Seventeenth Application
3 Period focused on prosecuting the Receiver's claims against Mills Potoczak &
4 Company ("MPC") on behalf of PWCG Trust (the Receiver's Complaint against
5 MPC was previously filed on September 3, 2020). The firm's diligent work during
6 the first quarter, in coordination with counsel for the putative investor class, directly
7 lead to the very favorable settlement of the case against MPC for \$9.75 million
8 settlement out of \$10 million in available insurance coverage (\$5 million in primary
9 coverage and \$5 million in excess coverage). A motion to approve the Settlement
10 Agreement will be filed soon.

11 The Receiver, the investor-plaintiffs and MPC attended mediation with the
12 Hon. Raymond J. Ikola (Ret.) of JAMS on January 13, 2022. Allen Matkins
13 prepared the Receiver's mediation brief, participated on a pre-mediation call with
14 Justice Ikola, attend the full-day mediation, and communicated with counsel for
15 MPC and counsel for the investor-plaintiffs regarding the MPC insurance coverage
16 issues, settlement, mediation issues, as well as the scheduling of further discovery
17 for after the mediation. The case did not settle at mediation, and MPC promptly
18 filed a declaratory relief action to address the disputed issues of insurance coverage
19 raised during the mediation. The Receiver and the putative investor class also
20 issued a second joint settlement demand on MPC for the limits of its available
21 insurance coverage.

22 Allen Matkins continued to assist the Receiver in moving the case forward,
23 including noticing, preparing for, and taking the deposition of MPC's person most
24 knowledgeable, William Potoczak. The firm also handled communications with the
25 expert witness the Receiver planned to use and handled the sharing of relevant
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.

documents with counsel for the putative investor class. Allen Matkins analyzed the coverage positions asserted by MPC's respective insurance carriers, which became a significant obstacle to settlement of the case.

Allen Matkins handled negotiations with MPC and its insurance carriers on behalf of the Receiver, including coordinating such negotiations with counsel for the putative investor class. As noted above, these negotiations ultimately resulted in a settlement in which MPC, subject to Court approval, will pay \$9.75 million out of \$10 million in available insurance coverage. The reasonable and necessary fees for work in this category total \$161,585.10.

B. Summary of Expenses Requested for Reimbursement

Allen Matkins requests the Court approve reimbursement of \$7,319.29 in out-of-pocket costs. The itemization of such expenses is summarized below by category.

Category	Total
E-Discovery	\$2,776.24
Document Searches (incl. PACER, Lexis, Sec. of State)	\$1,387.70
Duplication	\$16.40
Mediation Fee (JAMS)	\$75.60
Deposition Transcript	\$3,063.35
TOTAL	\$7,319.29

FEES AND COSTS INCURRED AND PAID TO DATE

From inception of the receivership through March 31, 2022, the Receiver incurred fees and costs of \$530,220.62, of which amount \$99,564.66 is subject to holdback pending approval of the Receiver's final fee application at the conclusion of the receivership, \$17,224.70 is awaiting the Court's review and approval, and \$416,613.21 has been approved by the Court and paid to date. During the same time period, Allen Matkins has incurred fees and costs of \$1,384,061.27, of which

1 amount \$270,855.45 is subject to holdback pending approval of Allen Matkins' final
2 fee application at the conclusion of the receivership, \$182,198.74 is awaiting the
3 Court's review and approval, and \$965,982.97 has been approved by the Court and
4 paid to date.

5 **IV. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE**
6 **ALLOWED**

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

14 In allowing fees, a court should consider "the time, labor and skill required,
15 but not necessarily that actually expended, in the proper performance of the duties
16 imposed by the court upon the receiver[], the fair value of such time, labor and skill
17 measured by conservative business standards, the degree of activity, integrity and
18 dispatch with which the work is conducted and the result obtained." *United States v.*
19 *Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks
20 omitted). In practical terms, receiver and professional compensation thus ultimately
21 rests upon the result of an equitable, multi-factor balancing test involving the
22 "economy of administration, the burden that the estate may be able to bear, the
23 amount of time required, although not necessarily expended, and the overall value of
24 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d 232, 237 (3d Cir.
25 1970). Regardless of how this balancing test is formulated, no single factor is
26 determinative and "a reasonable fee is based [upon] all circumstances surrounding
27 the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*,
28 374 F. Supp. 465, 480 (S.D. Tex. 1974).

1 As a preliminary matter, the Appointment Order confers on the Receiver
2 substantial duties and powers, including to conduct such investigation and discovery
3 as is necessary to locate and account for all receivership assets, take such action as is
4 necessary and appropriate to assume control over and preserve receivership assets,
5 and employ attorneys and others to investigate and, where appropriate, institute,
6 pursue, and prosecute all claims and causes of action of whatever kind and nature.
7 *See* Appointment Order, Section III.

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

13 Allen Matkins has submitted a detailed fee application which describes the
14 nature of the services rendered, and the identity and billing rate of each individual
15 performing each task. *See* Exhibit A. Allen Matkins has endeavored to staff matters
16 as efficiently as possible, while remaining cognizant of the complexity of issues.
17 The request for fees is based on Allen Matkins' customary billing rates charged for
18 comparable services provided in other matters, less a 10% discount. In addition, the
19 firm has written off and not charged for 0.70 hours of time (\$450.45) during the
20 Seventeenth Application Period.

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

1 Allen Matkins' fees are fair and reasonable and should be approved and paid on an
2 interim basis.

3 **V. CONCLUSION**

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

- 5 1. Approving Allen Matkins' fees, on an interim basis, of \$174,879.45;
6 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
7 \$139,903.56, from the assets of the Receivership Entities;
8 3. Approving Allen Matkins' costs in the amount of \$7,319.29 and
9 authorizing and directing the Receiver to reimburse such costs in full; and
10 4. For such other and further relief as the Court deems appropriate.

11
12 Dated: August 5, 2022

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

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14 By: /s/ Edward Fates

15 EDWARD G. FATES
16 Attorneys for Receiver
17 THOMAS HEBRANK
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EXHIBIT A

07/20/22 17:37:33 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: 04/22/22 Matter Name: General Receivership
 Proforma Number: 1170892
 Client/Matter Joint Group # 377432-1 Client Matter Number:

Fees for Matter 377432.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/18/22	8699915	Analysis and determination of document productions and deposition materials in preparation for attorney review.	Peng, Simona	0.80	252.00	252.00	WO	HD	TR
01/19/22	8699951	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.30	94.50	346.50	WO	HD	TR
02/03/22	8717579	Advise Receiver on issues / updates for status conference on 2/7/22	Fates, Edward (Ted)	0.20	128.70	475.20	WO	HD	TR
02/08/22	8727388	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.30	94.50	569.70	WO	HD	TR
02/09/22	8727481	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.30	94.50	664.20	WO	HD	TR
03/07/22	8755432	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.10	31.50	695.70	WO	HD	TR
03/08/22	8755438	Analysis and determination of document productions in preparation for attorney	Peng, Simona	0.50	157.50	853.20	WO	HD	TR

07/20/22 17:37:33 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 review.	Timekeeper	Hours	Fees	Sum	Circle	Action	
03/10/22	8755481	Analysis and determination of document productions in preparation for attorney review.	Peng, Simona	0.40	126.00	979.20	WO	HD	TR _____
03/15/22	8758952	Advise on issues re: discovery requests from counsel for remaining defendants (.2) communications with SEC counsel re: same (.1)	Fates, Edward (Ted)	0.30	193.05	1,172.25	WO	HD	TR _____
03/15/22	8760013	Several emails related to the defendant's discovery requests (.4). Call with counsel and email with Receiver related to discovery response (.3).	Zaro, David	0.70	585.90	1,758.15	WO	HD	TR _____
03/16/22	8761679	Several conferences with counsel, emails with Receiver related to the discovery requests from defendants.	Zaro, David	0.40	334.80	2,092.95	WO	HD	TR _____
03/22/22	8765901	Advise on issues relating to new subpoena for documents issued to Receiver by remaining defendants	Fates, Edward (Ted)	0.20	128.70	2,221.65	WO	HD	TR _____
03/22/22	8767657	Several emails to/from the defendant's counsel regarding ITM and discovery/subpoenas (.4). Email with ITM general counsel related to the subpoenas (.2).	Zaro, David	0.60	502.20	2,723.85	WO	HD	TR _____
03/23/22	8767134	Advise on issues relating to production of documents by Receiver in response to subpoena	Fates, Edward (Ted)	0.40	257.40	2,981.25	WO	HD	TR _____
03/23/22	8772083	Several emails with counsel related to the subpoena and follow-up (.3). Call with ITM	Zaro, David	1.20	1,004.40	3,985.65	WO	HD	TR _____

07/20/22 17:37:33 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			
		general counsel and follow-up (.3). Email to the Receiver to address the response to the subpoena, assess production issues regarding ITM protective order (.6).								
03/24/22	8772148	Several emails related to discovery requests of defendants (.2). Call with Receiver related to the discovery (.2). Conference with Mr. Jones related to discovery (.3). Email with ITM counsel related to the discovery and follow-up with defendants (.6).	Zaro, David	1.30	1,088.10	5,073.75	WO	HD	TR	_____
03/28/22	8777376	Several emails related to defendants' discovery and ITM subpoena.	Zaro, David	0.40	334.80	5,408.55	WO	HD	TR	_____
03/30/22	8777416	Several emails/work on ITM subpoena and address response, follow-up.	Zaro, David	0.30	251.10	5,659.65	WO	HD	TR	_____
03/31/22	8782266	Emails with counsel for ITM21 and address issues/objections to requests.	Zaro, David	0.40	334.80	5,994.45	WO	HD	TR	_____

Disbursements for Matter 377432.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
01/01/22	2749926	EDISC – CS Disco, Inc. - Monthly Hosting for January 2022	0.00	150.00	WO	HD	TR	_____
01/01/22	2749966	EDISC – CS Disco, Inc. - Monthly Hosting for January 2022	0.00	543.42	WO	HD	TR	_____
01/01/22	2749971	EDISC – CS Disco, Inc. - Monthly Hosting for January 2022	0.00	150.00	WO	HD	TR	_____
01/06/22	2761151	DCSRCH – Document Search - - PACER - 10/21 - 12/21 Usage	0.00	0.20	WO	HD	TR	_____

07/20/22 17:37:33 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					
01/06/22	2761152	DCSRCH – Document Search - - PACER - 10/21 - 12/21 Usage	0.00	1.10	WO	HD	TR		_____
01/06/22	2761153	DCSRCH – Document Search - - PACER - 10/21 - 12/21 Usage	0.00	52.80	WO	HD	TR		_____
02/01/22	2753865	EDISC – CS Disco, Inc. - Monthly Hosting for February 2022	0.00	150.00	WO	HD	TR		_____
02/01/22	2753903	EDISC – CS Disco, Inc. - Monthly Hosting for February 2022	0.00	666.41	WO	HD	TR		_____
02/01/22	2753908	EDISC – CS Disco, Inc. - Monthly Hosting for February 2022	0.00	275.00	WO	HD	TR		_____
02/04/22	2751370	DCSRCH – Case Anywhere LLC - System Access Fee (11/1/2021 - 1/31/2022)	0.00	120.00	WO	HD	TR		_____
02/13/22	2754379	RSRCH – WestLaw	0.00	482.80	WO	HD	TR		_____
03/01/22	2756177	EDISC – CS Disco, Inc. - Monthly Hosting for March 2022	0.00	150.00	WO	HD	TR		_____
03/01/22	2756215	EDISC – CS Disco, Inc. - Monthly Hosting for March 2022	0.00	541.41	WO	HD	TR		_____
03/01/22	2756220	EDISC – CS Disco, Inc. - Monthly Hosting for March 2022	0.00	150.00	WO	HD	TR		_____
03/02/22	2758806	RSRCH – WestLaw	0.00	572.40	WO	HD	TR		_____
03/02/22	2759116	RSRCH – Lexis	0.00	158.40	WO	HD	TR		_____
03/03/22	2755400	BW – Duplication - Black & White Copies	115.00	11.50	WO	HD	TR		_____
03/03/22	2755401	COLOR – Duplication - Color Copies	49.00	4.90	WO	HD	TR		_____
03/03/22	2755441	MEDIT – JAMS, Inc. - Deposit for Services of Hon. Raymond J. Ikola	0.00	75.60	WO	HD	TR		_____
03/08/22	2755720	DEPO – Veritext, LLC - Deposition Transcript of William Potoczak , PMQ Taken on 03/04/2022	0.00	3,063.35	WO	HD	TR		_____
Proforma Summary									

07/20/22 17:37:33 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	5.30	837.00	4,436.10
001665	Fates, Edward (Ted)	1.10	643.50	707.85
002307	Peng, Simona	2.70	315.00	850.50
		<u>9.10</u>		<u>\$5,994.45</u>
Subtotal Fees				\$5,994.45
Discount				0.00
Total Fees				5,994.45
Total Disbursements				7,319.29

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

Account Summary – As Of 07/20/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	16,440.79	9,121.50	7,319.29	146,637.42	123,588.00	23,049.42
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	2,119.59	15.03	2,104.56
Billed	0.00	0.00	0.00	10,335.47	7,740.00	2,595.47	114,461.01	114,461.01	15,730.13
Collected	0.00	0.00	0.00	10,335.47	7,740.00	2,595.47	130,191.14	114,461.01	15,730.13
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	18,648.38	9,121.50	9,526.88						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

07/20/22 17:37:33 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

Billing Address

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

07/20/22 17:37:34 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: 04/22/22 Matter Name: Reporting
Proforma Number: 1170892
Client/Matter Joint Group # 377432-1 Client Matter Number:

Fees for Matter 377432.00004.(Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/10/22	8691516	Assess issues, status per several emails with Receiver and counsel, address Court ordered status conference and notice.	Zaro, David	0.60	502.20	502.20	WO	HD	TR
01/11/22	8689666	Work on Receiver's 16th interim report, discuss same with Receiver	Fates, Edward (Ted)	1.20	772.20	1,274.40	WO	HD	TR
01/25/22	8704634	Revisions/updates to Receiver's 16th interim report	Fates, Edward (Ted)	0.70	450.45	1,724.85	WO	HD	TR
01/26/22	8704633	Meet and confer communications with SEC counsel regarding Receiver's 16th interim report	Fates, Edward (Ted)	0.20	128.70	1,853.55	WO	HD	TR
01/26/22	8706414	Work on the draft of Receiver's report and recommendations, call with Receiver/counsel (.6).	Zaro, David	0.60	502.20	2,355.75	WO	HD	TR
01/28/22	8707780	Meet and confer communications with SEC counsel (.1) finalize interim report (.2)	Fates, Edward (Ted)	0.30	193.05	2,548.80	WO	HD	TR
01/28/22	8714290	Follow-up on draft report Receiver report, review final draft and related emails.	Zaro, David	0.40	334.80	2,883.60	WO	HD	TR

07/20/22 17:37:34 PROFORMA STATEMENT FOR MATTER 377432.00004 (Thomas C. Hebrank, as Receiver for PWCG) (Reporting)

Fees for Matter 377432.00004.(Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
02/03/22	8720164	Emails related to the Receiver Report, follow-up regarding same (.3). Call/email with the Receiver and counsel related to the hearing and report to the Court (.3).	Zaro, David	0.60	502.20	3,385.80	WO	HD	TR _____
02/04/22	8721757	Email/call with counsel to prepare for the hearing/Receiver's Report (.4). Follow-up on Receiver's Report timing of policies (.2),	Zaro, David	0.60	502.20	3,888.00	WO	HD	TR _____
02/07/22	8721778	Review of the case materials, reports and prepare for the hearing as to the Receiver's Report and Recommendations (.9). Attend the hearing regarding the Receiver's 16th Report, follow-up and call with Receiver (.8).	Zaro, David	1.70	1,422.90	5,310.90	WO	HD	TR _____
02/11/22	8727002	Communications with the Court and Receiver related to court appearance, follow-up on preparation for the upcoming hearing.	Zaro, David	0.40	334.80	5,645.70	WO	HD	TR _____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	4.90	837.00	4,101.30
001665	Fates, Edward (Ted)	2.40	643.50	1,544.40
		<u>7.30</u>		<u>\$5,645.70</u>
Subtotal Fees				\$5,645.70
Discount				0.00
Total Fees				5,645.70
Total Disbursements				0.00

Attorney Billing Instructions

07/20/22 17:37:34 PROFORMA STATEMENT FOR MATTER 377432.00004 (Thomas C. Hebrank, as Receiver for PWCG) (Reporting)

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

Account Summary – As Of 07/20/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	6,997.05	6,997.05	0.00	58,750.95	52,952.85	5,798.10
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	11,770.95	5,972.85	5,798.10	45,955.80	45,955.80	5,798.10
Collected	0.00	0.00	0.00	11,770.95	5,972.85	5,798.10	51,753.90	45,955.80	5,798.10
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	6,997.05	6,997.05	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

07/20/22 17:37:35 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: 04/22/22 Matter Name: Claims & Distributions
 Proforma Number: 1170892
 Client/Matter Joint Group # 377432-1 Client Matter Number:

Fees for Matter 377432.00006.(Claims & Distributions)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
03/24/22	8768631	Advise A. Herren re: deceased investor, probate representative and change of holder of claim	Fates, Edward (Ted)	0.20	128.70	128.70	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.20	643.50	128.70
		0.20		\$128.70
Subtotal Fees				\$128.70
Discount				0.00
Total Fees				128.70
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

07/20/22 17:37:35 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

Account Summary – As Of 07/20/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	257.40	257.40	0.00	146,760.30	146,760.30	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	6.66	6.66	0.00
Billed	0.00	0.00	0.00	1,724.85	1,724.85	0.00	146,509.56	146,509.56	0.00
Collected	0.00	0.00	0.00	1,724.85	1,724.85	0.00	146,509.56	146,509.56	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>WIP</i>	<i>Total</i>	<i>Fees</i>	<i>Costs</i>						
<i>Balance</i>	<i>257.40</i>	<i>257.40</i>	<i>0.00</i>						
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>						
<i>Unalloc</i>	<i>0.00</i>								
<i>Payment</i>									
<i>Client Trust</i>	<i>0.00</i>								
<i>Balance</i>									

Billing Address

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

07/20/22 17:37:36 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: 04/22/22 Matter Name: Employment/Fees
Proforma Number: 1170892
Client/Matter Joint Group # 377432-1 Client Matter Number:

Fees for Matter 377432.00009.(Employment/Fees)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/03/22	8679432	Meet and confer communications with counsel for SEC re: interim fee applications	Fates, Edward (Ted)	0.20	128.70	128.70	WO	HD	TR
02/10/22	8724005	Communications with Duffy firm re: interim fee application	Fates, Edward (Ted)	0.20	128.70	257.40	WO	HD	TR
02/14/22	8729960	Prepare for the hearing on the fee applications of Receiver and counsel (.4). Attend the hearing on the fee applications before Judge Pregerson and follow-up regarding same (.5).	Zaro, David	0.90	753.30	1,010.70	WO	HD	TR
03/09/22	8753228	Revisions to Receiver interim fee application (.2) meet and confer communications with SEC counsel regarding interim fee applications (.2)	Fates, Edward (Ted)	0.40	257.40	1,268.10	WO	HD	TR
03/14/22	8759939	Meet and confer with SEC counsel regarding fee applications (.1) communications with Duffy regarding finalization of fee application for filing (.1)	Fates, Edward (Ted)	0.20	128.70	1,396.80	WO	HD	TR
03/16/22	8760298	Finalize Receiver and Duffy fee applications for filing	Fates, Edward (Ted)	0.20	128.70	1,525.50	WO	HD	TR

07/20/22 17:37:36 PROFORMA STATEMENT FOR MATTER 377432.00009 (Thomas C. Hebrank, as Receiver for PWCG) (Employment/Fees)

Fees for Matter 377432.00009.(Employment/Fees)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
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Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.90	837.00	753.30
001665	Fates, Edward (Ted)	1.20	643.50	772.20
		2.10		\$1,525.50
Subtotal Fees				\$1,525.50
Discount				0.00
Total Fees				1,525.50
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2023: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

Account Summary – As Of 07/20/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	2,027.70	2,027.70	0.00	9,678.15	9,678.15	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	7.11	7.11	0.00
Billed	0.00	0.00	0.00	1,750.95	1,750.95	0.00	7,657.56	7,657.56	0.00
Collected	0.00	0.00	0.00	1,750.95	1,750.95	0.00	7,657.56	7,657.56	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	2,027.70	2,027.70	0.00						

07/20/22 17:37:36 PROFORMA STATEMENT FOR MATTER 377432.00009 (Thomas C. Hebrank, as Receiver for PWCG) (Employment/Fees)

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

07/20/22 17:37:38 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: 04/22/22 Matter Name: MP&C Litigation
Proforma Number: 1170892
Client/Matter Joint Group # 377432-1 Client Matter Number:

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
01/03/22	8680862		Fates, Edward (Ted)	1.50	965.25	965.25	WO	HD	TR
01/03/22	8685575		Zaro, David	2.70	2,259.90	3,225.15	WO	HD	TR
01/03/22	8714453		Farrell, Michael	2.60	2,000.70	5,225.85	WO	HD	TR

07/20/22 17:37:38 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		
01/04/22	8684667		Fates, Edward (Ted)	2.60	1,673.10	6,898.95	WO	HD	TR	_____
01/04/22	8686373		Zaro, David	1.40	1,171.80	8,070.75	WO	HD	TR	_____
01/04/22	8709385		Pham, Matt D.	0.30	124.20	8,194.95	WO	HD	TR	_____
01/04/22	8709387		Pham, Matt D.	0.50	207.00	8,401.95	WO	HD	TR	_____
01/04/22	8709405		Pham, Matt D.	0.10	41.40	8,443.35	WO	HD	TR	_____
01/04/22	8714954		Farrell, Michael	0.90	692.55	9,135.90	WO	HD	TR	_____
01/05/22	8685245		Fates, Edward (Ted)	1.80	1,158.30	10,294.20	WO	HD	TR	_____

07/20/22 17:37:38 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			
01/05/22	8690374		Zaro, David	1.70	1,422.90	11,717.10	WO	HD	TR	_____
01/05/22	8715330		Farrell, Michael	3.90	3,001.05	14,718.15	WO	HD	TR	_____
01/06/22	8686159		Fates, Edward (Ted)	1.20	772.20	15,490.35	WO	HD	TR	_____
01/06/22	8690422		Zaro, David	1.40	1,171.80	16,662.15	WO	HD	TR	_____

07/20/22 17:37:38 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	
01/06/22	8715508		Farrell, Michael	1.30	1,000.35	17,662.50	WO	HD	TR _____
01/07/22	8687015		Fates, Edward (Ted)	0.80	514.80	18,177.30	WO	HD	TR _____
01/07/22	8687611		Farrell, Michael	0.40	307.80	18,485.10	WO	HD	TR _____
01/07/22	8691443		Zaro, David	1.20	1,004.40	19,489.50	WO	HD	TR _____
01/10/22	8713969		Farrell, Michael	0.30	230.85	19,720.35	WO	HD	TR _____
01/11/22	8692540		Zaro, David	0.40	334.80	20,055.15	WO	HD	TR _____
01/12/22	8691091		Fates, Edward (Ted)	0.90	579.15	20,634.30	WO	HD	TR _____
01/12/22	8692549		Zaro, David	0.90	753.30	21,387.60	WO	HD	TR _____

07/20/22 17:37:38 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			
01/12/22	8713097		Farrell, Michael	1.60	1,231.20	22,618.80	WO	HD	TR	_____
01/13/22	8692727		Fates, Edward (Ted)	6.10	3,925.35	26,544.15	WO	HD	TR	_____
01/13/22	8696077		Zaro, David	0.90	753.30	27,297.45	WO	HD	TR	_____
01/13/22	8708813		Farrell, Michael	7.10	5,463.45	32,760.90	WO	HD	TR	_____
01/14/22	8696045		Zaro, David	0.70	585.90	33,346.80	WO	HD	TR	_____

07/20/22 17:37:38 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	
01/14/22	8712870		Farrell, Michael	0.80	615.60	33,962.40	WO	HD	TR _____
01/18/22	8696161		Fates, Edward (Ted)	0.80	514.80	34,477.20	WO	HD	TR _____
01/18/22	8699054		Zaro, David	1.30	1,088.10	35,565.30	WO	HD	TR _____
01/18/22	8711394		Pham, Matt D.	0.40	165.60	35,730.90	WO	HD	TR _____
01/18/22	8711404		Pham, Matt D.	0.70	289.80	36,020.70	WO	HD	TR _____
01/18/22	8711408		Pham, Matt D.	0.80	331.20	36,351.90	WO	HD	TR _____
01/18/22	8711416		Pham, Matt D.	0.70	289.80	36,641.70	WO	HD	TR _____
01/18/22	8711424		Pham, Matt D.	1.40	579.60	37,221.30	WO	HD	TR _____

07/20/22 17:37:38 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			
01/18/22	8711430		Pham, Matt D.	0.20	82.80	37,304.10	WO	HD	TR	_____
01/18/22	8712745		Farrell, Michael	1.30	1,000.35	38,304.45	WO	HD	TR	_____
01/19/22	8696940		Fates, Edward (Ted)	1.10	707.85	39,012.30	WO	HD	TR	_____
01/19/22	8702284		Zaro, David	0.80	669.60	39,681.90	WO	HD	TR	_____
01/19/22	8711973		Farrell, Michael	1.40	1,077.30	40,759.20	WO	HD	TR	_____

07/20/22 17:37:38 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		
01/20/22	8702412		Zaro, David	0.60	502.20	41,261.40	WO	HD	TR	_____
01/20/22	8711846		Farrell, Michael	0.30	230.85	41,492.25	WO	HD	TR	_____
01/20/22	8712948		Pham, Matt D.	0.20	82.80	41,575.05	WO	HD	TR	_____
01/23/22	8708876		Farrell, Michael	0.30	230.85	41,805.90	WO	HD	TR	_____
01/25/22	8705165		Zaro, David	1.10	920.70	42,726.60	WO	HD	TR	_____
01/25/22	8708861		Farrell, Michael	0.90	692.55	43,419.15	WO	HD	TR	_____
01/25/22	8713237		Pham, Matt D.	1.30	538.20	43,957.35	WO	HD	TR	_____
01/26/22	8704933		Fates, Edward (Ted)	0.90	579.15	44,536.50	WO	HD	TR	_____

07/20/22 17:37:38 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			
01/26/22	8706431		Zaro, David	1.30	1,088.10	45,624.60	WO	HD	TR	_____
01/26/22	8708844		Farrell, Michael	0.90	692.55	46,317.15	WO	HD	TR	_____
01/26/22	8900180		Zaro, David	0.80	669.60	46,986.75	WO	HD	TR	_____
02/03/22	8717426		Fates, Edward (Ted)	0.40	257.40	47,244.15	WO	HD	TR	_____
02/03/22	8720165		Zaro, David	0.80	669.60	47,913.75	WO	HD	TR	_____
02/03/22	8741442		Farrell, Michael	0.80	615.60	48,529.35	WO	HD	TR	_____

07/20/22 17:37:38 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	
02/04/22	8718723		Fates, Edward (Ted)	0.50	321.75	48,851.10	WO	HD	TR _____
02/04/22	8720692		Zaro, David	1.40	1,171.80	50,022.90	WO	HD	TR _____
02/04/22	8741599		Farrell, Michael	1.30	1,000.35	51,023.25	WO	HD	TR _____
02/06/22	8741651		Farrell, Michael	0.20	153.90	51,177.15	WO	HD	TR _____
02/07/22	8719707		Fates, Edward (Ted)	2.50	1,608.75	52,785.90	WO	HD	TR _____
02/07/22	8721781		Zaro, David	3.90	3,264.30	56,050.20	WO	HD	TR _____

07/20/22 17:37:38 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			
02/07/22	8741737		Farrell, Michael	2.20	1,692.90	57,743.10	WO	HD	TR	_____
02/08/22	8723089		Zaro, David	1.20	1,004.40	58,747.50	WO	HD	TR	_____
02/08/22	8724004		Fates, Edward (Ted)	1.10	707.85	59,455.35	WO	HD	TR	_____

07/20/22 17:37:38 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	
02/08/22	8741807		Farrell, Michael	2.00	1,539.00	60,994.35	WO	HD	TR
02/08/22	8742149		Pham, Matt D.	0.40	165.60	61,159.95	WO	HD	TR
02/08/22	8742150		Pham, Matt D.	0.30	124.20	61,284.15	WO	HD	TR
02/09/22	8722733		Fates, Edward (Ted)	1.40	900.90	62,185.05	WO	HD	TR
02/09/22	8724259		Zaro, David	1.40	1,171.80	63,356.85	WO	HD	TR
02/09/22	8742064		Farrell, Michael	1.30	1,000.35	64,357.20	WO	HD	TR

07/20/22 17:37:38 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			
02/09/22	8742169		Pham, Matt D.	0.40	165.60	64,522.80	WO	HD	TR	_____
02/10/22	8742215		Farrell, Michael	0.90	692.55	65,215.35	WO	HD	TR	_____
02/13/22	8742218		Pham, Matt D.	1.40	579.60	65,794.95	WO	HD	TR	_____
02/13/22	8742219		Pham, Matt D.	1.90	786.60	66,581.55	WO	HD	TR	_____
02/14/22	8726664		Fates, Edward (Ted)	0.20	128.70	66,710.25	WO	HD	TR	_____
02/14/22	8727397		Farrell, Michael	0.30	230.85	66,941.10	WO	HD	TR	_____
02/15/22	8727995		Fates, Edward (Ted)	0.40	257.40	67,198.50	WO	HD	TR	_____
02/15/22	8729990		Zaro, David	0.80	669.60	67,868.10	WO	HD	TR	_____

07/20/22 17:37:38 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			
02/15/22	8729994		Zaro, David	0.80	669.60	68,537.70	WO	HD	TR	_____
02/15/22	8739425		Farrell, Michael	0.70	538.65	69,076.35	WO	HD	TR	_____
02/15/22	8742235		Pham, Matt D.	0.60	248.40	69,324.75	WO	HD	TR	_____
02/15/22	8742237		Pham, Matt D.	0.30	124.20	69,448.95	WO	HD	TR	_____
02/16/22	8733971		Zaro, David	1.10	920.70	70,369.65	WO	HD	TR	_____
02/16/22	8739466		Farrell, Michael	1.20	923.40	71,293.05	WO	HD	TR	_____

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Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
02/16/22	8742250		Pham, Matt D.	0.20	82.80	71,375.85	WO	HD	TR	_____
02/17/22	8742296		Pham, Matt D.	0.10	41.40	71,417.25	WO	HD	TR	_____
02/22/22	8735496		Zaro, David	0.70	585.90	72,003.15	WO	HD	TR	_____
02/22/22	8739002		Farrell, Michael	0.40	307.80	72,310.95	WO	HD	TR	_____
02/22/22	8742341		Pham, Matt D.	1.90	786.60	73,097.55	WO	HD	TR	_____
02/22/22	8742343		Pham, Matt D.	0.90	372.60	73,470.15	WO	HD	TR	_____
02/23/22	8735137		Fates, Edward (Ted)	0.40	257.40	73,727.55	WO	HD	TR	_____
02/23/22	8736785		Zaro, David	0.40	334.80	74,062.35	WO	HD	TR	_____

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Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
02/23/22	8738995		Farrell, Michael	0.20	153.90	74,216.25	WO	HD	TR	_____
02/24/22	8738230		Fates, Edward (Ted)	0.60	386.10	74,602.35	WO	HD	TR	_____
02/24/22	8738990		Farrell, Michael	0.30	230.85	74,833.20	WO	HD	TR	_____
02/24/22	8742400		Pham, Matt D.	1.20	496.80	75,330.00	WO	HD	TR	_____
02/24/22	8743934		Zaro, David	0.70	585.90	75,915.90	WO	HD	TR	_____
02/25/22	8738370		Fates, Edward (Ted)	0.40	257.40	76,173.30	WO	HD	TR	_____
02/25/22	8739026		Farrell, Michael	0.80	615.60	76,788.90	WO	HD	TR	_____
02/25/22	8744146		Zaro, David	1.10	920.70	77,709.60	WO	HD	TR	_____

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Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
02/28/22	8739972		Fates, Edward (Ted)	1.50	965.25	78,674.85	WO	HD	TR	_____
02/28/22	8741309		Farrell, Michael	4.10	3,154.95	81,829.80	WO	HD	TR	_____
02/28/22	8744231		Pham, Matt D.	0.60	248.40	82,078.20	WO	HD	TR	_____
02/28/22	8744235		Pham, Matt D.	0.90	372.60	82,450.80	WO	HD	TR	_____
02/28/22	8744237		Pham, Matt D.	0.30	124.20	82,575.00	WO	HD	TR	_____

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Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
02/28/22	8744238		Pham, Matt D.	0.60	248.40	82,823.40	WO	HD	TR	_____
02/28/22	8744291		Zaro, David	2.70	2,259.90	85,083.30	WO	HD	TR	_____
03/01/22	8747130		Fates, Edward (Ted)	0.40	257.40	85,340.70	WO	HD	TR	_____
03/01/22	8748089		Zaro, David	0.70	585.90	85,926.60	WO	HD	TR	_____
03/01/22	8775752		Farrell, Michael	2.30	1,769.85	87,696.45	WO	HD	TR	_____
03/01/22	8778743		Pham, Matt D.	1.40	579.60	88,276.05	WO	HD	TR	_____
03/01/22	8778744		Pham, Matt D.	1.50	621.00	88,897.05	WO	HD	TR	_____

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Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
03/01/22	8778747		Pham, Matt D.	1.00	414.00	89,311.05	WO	HD	TR	_____
03/01/22	8778749		Pham, Matt D.	1.60	662.40	89,973.45	WO	HD	TR	_____
03/01/22	8778750		Pham, Matt D.	1.30	538.20	90,511.65	WO	HD	TR	_____
03/02/22	8746907		Fates, Edward (Ted)	0.90	579.15	91,090.80	WO	HD	TR	_____
03/02/22	8747352		Rosenblum, Rachel	2.80	882.00	91,972.80	WO	HD	TR	_____
03/02/22	8749006		Zaro, David	0.80	669.60	92,642.40	WO	HD	TR	_____
03/02/22	8775796		Farrell, Michael	5.30	4,078.35	96,720.75	WO	HD	TR	

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Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
03/02/22	8778752		Pham, Matt D.	1.80	745.20	97,465.95	WO	HD	TR	_____
03/02/22	8778754		Pham, Matt D.	1.30	538.20	98,004.15	WO	HD	TR	_____
03/02/22	8778756		Pham, Matt D.	1.70	703.80	98,707.95	WO	HD	TR	_____
03/02/22	8778759		Pham, Matt D.	1.00	414.00	99,121.95	WO	HD	TR	_____
03/02/22	8778762		Pham, Matt D.	0.60	248.40	99,370.35	WO	HD	TR	_____
03/02/22	8778764		Pham, Matt D.	1.10	455.40	99,825.75	WO	HD	TR	_____
03/02/22	8778766		Pham, Matt D.	0.80	331.20	100,156.95	WO	HD	TR	_____
03/03/22	8775998		Farrell, Michael	6.30	4,847.85	105,004.80	WO	HD	TR	_____

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Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
03/03/22	8778793		Pham, Matt D.	0.70	289.80	105,294.60	WO	HD	TR	_____
03/03/22	8778794		Pham, Matt D.	0.60	248.40	105,543.00	WO	HD	TR	_____
03/03/22	8778796		Pham, Matt D.	1.50	621.00	106,164.00	WO	HD	TR	_____
03/04/22	8748951		Fates, Edward (Ted)	5.10	3,281.85	109,445.85	WO	HD	TR	_____
03/04/22	8751206		Farrell, Michael	10.50	8,079.75	117,525.60	WO	HD	TR	_____
03/04/22	8752152		Zaro, David	1.70	1,422.90	118,948.50	WO	HD	TR	_____
03/04/22	8778808		Pham, Matt D.	0.20	82.80	119,031.30	WO	HD	TR	_____

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Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
03/04/22	8778809		Pham, Matt D.	0.20	82.80	119,114.10	WO	HD	TR	_____
03/07/22	8750585		Fates, Edward (Ted)	0.90	579.15	119,693.25	WO	HD	TR	_____
03/07/22	8752173		Zaro, David	0.60	502.20	120,195.45	WO	HD	TR	_____
03/07/22	8776051		Farrell, Michael	2.40	1,846.80	122,042.25	WO	HD	TR	_____
03/07/22	8778865		Pham, Matt D.	0.90	372.60	122,414.85	WO	HD	TR	_____
03/08/22	8753436		Zaro, David	1.10	920.70	123,335.55	WO	HD	TR	

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Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
03/08/22	8776213		Farrell, Michael	3.50	2,693.25	126,028.80	WO	HD	TR
03/08/22	8778880		Pham, Matt D.	0.10	41.40	126,070.20	WO	HD	TR
03/08/22	8778883		Pham, Matt D.	0.40	165.60	126,235.80	WO	HD	TR
03/09/22	8753294		Fates, Edward (Ted)	1.40	900.90	127,136.70	WO	HD	TR
03/09/22	8754537		Zaro, David	0.90	753.30	127,890.00	WO	HD	TR

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Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
03/09/22	8776294		Farrell, Michael	2.10	1,615.95	129,505.95	WO	HD	TR _____
03/10/22	8755068		Fates, Edward (Ted)	0.90	579.15	130,085.10	WO	HD	TR _____
03/10/22	8776323		Farrell, Michael	1.90	1,462.05	131,547.15	WO	HD	TR _____
03/11/22	8755862		Fates, Edward (Ted)	1.30	836.55	132,383.70	WO	HD	TR _____
03/11/22	8757935		Zaro, David	0.60	502.20	132,885.90	WO	HD	TR _____

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Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
03/11/22	8758168		Farrell, Michael	4.50	3,462.75	136,348.65	WO	HD	TR
03/14/22	8757737		Fates, Edward (Ted)	0.30	193.05	136,541.70	WO	HD	TR
03/16/22	8761665		Zaro, David	0.60	502.20	137,043.90	WO	HD	TR
03/16/22	8777367		Farrell, Michael	0.70	538.65	137,582.55	WO	HD	TR
03/18/22	8767464		Zaro, David	1.40	1,171.80	138,754.35	WO	HD	TR

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Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
03/18/22	8777613		Farrell, Michael	1.70	1,308.15	140,062.50	WO	HD	TR	_____
03/21/22	8767610		Zaro, David	0.90	753.30	140,815.80	WO	HD	TR	_____
03/21/22	8778067		Farrell, Michael	1.20	923.40	141,739.20	WO	HD	TR	_____
03/22/22	8767645		Zaro, David	0.90	753.30	142,492.50	WO	HD	TR	_____
03/22/22	8778168		Farrell, Michael	0.90	692.55	143,185.05	WO	HD	TR	_____

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Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	WO	Circle	Action	
03/23/22	8778209		Farrell, Michael	0.80	615.60	143,800.65	WO	HD	TR	_____
03/24/22	8769957		Fates, Edward (Ted)	0.80	514.80	144,315.45	WO	HD	TR	_____
03/24/22	8772173		Zaro, David	1.90	1,590.30	145,905.75	WO	HD	TR	_____
03/24/22	8778272		Farrell, Michael	2.20	1,692.90	147,598.65	WO	HD	TR	_____
03/25/22	8770479		Fates, Edward (Ted)	1.40	900.90	148,499.55	WO	HD	TR	_____
03/25/22	8777211		Zaro, David	1.80	1,506.60	150,006.15	WO	HD	TR	_____

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Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
03/25/22	8779443		Farrell, Michael	3.20	2,462.40	152,468.55	WO	HD	TR	_____
03/26/22	8779445		Farrell, Michael	0.80	615.60	153,084.15	WO	HD	TR	_____
03/28/22	8774565		Farrell, Michael	1.70	1,308.15	154,392.30	WO	HD	TR	_____
03/28/22	8777369		Zaro, David	1.30	1,088.10	155,480.40	WO	HD	TR	_____
03/29/22	8774523		Farrell, Michael	1.30	1,000.35	156,480.75	WO	HD	TR	_____

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Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
03/29/22	8777387		Zaro, David	0.40	334.80	156,815.55	WO	HD	TR
03/30/22	8777409		Zaro, David	1.60	1,339.20	158,154.75	WO	HD	TR
03/30/22	8779470		Farrell, Michael	1.00	769.50	158,924.25	WO	HD	TR
03/31/22	8779459		Farrell, Michael	1.50	1,154.25	160,078.50	WO	HD	TR
03/31/22	8782144		Zaro, David	1.80	1,506.60	161,585.10	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	53.20	837.00	44,528.40
000739	Farrell, Michael	96.50	769.50	74,256.75
001665	Fates, Edward (Ted)	40.50	643.50	26,061.75

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Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
002444	Rosenblum, Rachel	2.80	315.00	882.00
002510	Pham, Matt D.	38.30	414.00	15,856.20
		<u>231.30</u>		<u>\$161,585.10</u>
Subtotal Fees				\$161,585.10
Discount				0.00
Total Fees				161,585.10
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 6/30/2023: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

Account Summary – As Of 07/20/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	6,811.20	6,811.20	0.00	239,390.55	239,390.55	0.00	435,335.85	435,335.85	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	4.58	4.58	0.00
Billed	0.00	0.00	0.00	58,930.73	58,930.73	0.00	195,949.88	195,949.88	0.00
Collected	0.00	0.00	0.00	58,930.73	58,930.73	0.00	195,949.88	195,949.88	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	239,390.55	239,390.55	Costs						
Balance			0.00						
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

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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
