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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  
25  
26  
27  
28

Case No. 2:15-cv-02563 DDP(ASx)

**EIGHTEENTH 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 17, 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 eighteenth interim application for approval and  
 4 payment of fees and reimbursement of expenses ("Application"). This Application  
 5 covers the period from April 1, 2022, through June 30, 2022 ("Eighteenth  
 6 Application Period"), and seeks interim approval of \$109,918.35 in fees and  
 7 \$2,777.59 in expenses, and an order authorizing the Receiver to pay, on an interim  
 8 basis, 80% of the fees incurred (\$87,934.68) 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 Eighteenth Interim Report ("Eighteenth Report") filed on \_\_\_\_\_, 2022 (Dkt. No. \_\_\_\_), which describes in detail the Receiver's activities during the Eighteenth Application Period. This Application seeks interim approval of \$109,918.35 in fees for a total of 145.40 hours worked, and payment on an interim basis of 80% of that amount, or \$87,934.68. The work performed is described task-by-task on Exhibit A and is broken down into the following categories:

Category	Hours	Amount
General Receivership	49.10	\$36,941.85
Reporting	2.10	\$1,351.35
Claims & Distributions	0.20	\$128.70
Employment/Fees	0.60	\$502.20
MP&C Litigation	93.40	\$70,994.25
Total	145.40	\$109,918.35

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 preparing objections to the subpoenas and  
 3 addressing confidential information contained on documents produced through a  
 4 protective order. Attorney David Zaro also represented ITM TwentyFirst at the  
 5 deposition taken by Defendants. The reasonable and necessary fees for work in this  
 6 category total \$36,941.85.

## 7 2. Reporting

8 Allen Matkins' time in this category focused on preparing the Receiver's  
 9 Seventeenth Interim Report. Dkt. 481. The report contains detailed descriptions of  
 10 the Receiver's activities during the first quarter of 2022, policy maturities, investor  
 11 communications, pending litigation, tax issues, and post-receivership receipts and  
 12 disbursements. The report also includes the Receiver's recommendations for the  
 13 continued administration of the receivership estate. The reasonable and necessary  
 14 fees for work in this category total \$1,351.35.

## 15 3. Claims & Distributions

16 Allen Matkins assisted the Receiver in providing updates to investors through  
 17 the receivership website. The reasonable and necessary fees for work in this  
 18 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. Attorney David Zaro attended the hearing held on April 18, 2022.  
 23 The reasonable and necessary fees for work in this category total \$502.20.

## 24 5. MP&C Litigation<sup>1</sup>

25 The majority of Allen Matkins' work during the Eighteenth Application  
 26 Period focused on the Receiver's claims against Mills Potoczak & Company  
 27

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28 <sup>1</sup> Because this matter involves pending litigation, Allen Matkins' time entries have  
 been redacted so as not to disclose confidential information relating to the

1 ("MPC") on behalf of PWCG Trust (the Receiver's Complaint against MPC was  
2 previously filed on September 3, 2020) and settlement of those claims. The firm's  
3 diligent work during the second quarter, in coordination with counsel for the  
4 putative investor class, directly lead to the very favorable settlement of the case  
5 against MPC for \$9.75 million settlement out of \$10 million in available insurance  
6 coverage (\$5 million in primary coverage and \$5 million in excess coverage). A  
7 motion to approve the Settlement Agreement is expected to be filed soon.

8 The Receiver, the investor-plaintiffs and MPC were able to reach a  
9 settlement, subject to Court approval, in March 2022. A settlement agreement was  
10 then drafted that covers, among other things, resolution of the receivership estate's  
11 claims against MPC, resolution of the investor class claims against MPC, approval  
12 by this Court, approval by the Los Angeles Superior Court (as a class settlement),  
13 mutual releases, payment of class counsel's contingent fee, and distribution of the  
14 settlement funds through the receivership. The settlement agreement could not be  
15 signed, however, until MPC had negotiated and executed separate settlements with  
16 its insurance carriers, which took considerable time.

17 As a result of the delay caused by MPC's insurance carriers, a stipulation and  
18 order extending the dates and deadlines in the Receiver's case against MPC was  
19 prepared, filed with the Court, and approved by the Court. Allen Matkins also  
20 prepared a motion for approval of the settlement. At that point, to the Receiver's  
21 surprise, one of the class representatives in the state court actions refused to sign the  
22 Settlement Agreement, demanding a greater service award for acting as a class  
23 representative. Counsel for the proposed class has since addressed this issue  
24 through status conferences with Judge Riff who now has the two related state court  
25 cases. The Receiver hopes the issue will be resolved soon, the last signature on the  
26 Settlement Agreement can be obtained, and the Receiver can file the motion for  
27

28 Receiver's litigation strategy or approach to the case. An unredacted copy can be  
provided to the Court upon request for *in camera* review.

1 Court approval of the settlement. The reasonable and necessary fees for work in this  
2 category total \$70,994.25.

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

4 Allen Matkins requests the Court approve reimbursement of \$2,777.59 in out-  
5 of-pocket costs. The itemization of such expenses is summarized below by  
6 category.

Category	Total
E-Discovery	\$2,528.19
Document Searches (incl. PACER, Lexis, Sec. of State)	\$123.40
Mediation Deposit	\$126.00
TOTAL	\$2,777.59

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

14 From inception of the receivership through June 30, 2022, the Receiver  
15 incurred fees and costs of \$544,781.57, of which amount \$102,211.11 is subject to  
16 holdback pending approval of the Receiver's final fee application at the conclusion  
17 of the receivership, \$31,785.65 is awaiting the Court's review and approval, and  
18 \$416,613.21 has been approved by the Court and paid to date. During the same time  
19 period, Allen Matkins has incurred fees and costs of \$1,496,757.21, of which  
20 amount \$292,839.12 is subject to holdback pending approval of Allen Matkins' final  
21 fee application at the conclusion of the receivership, \$294,894.68 is awaiting the  
22 Court's review and approval, and \$965,982.97 has been approved by the Court and  
23 paid to date.

24 **IV. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE**  
25 **ALLOWED**

26 "As a general rule, the expenses and fees of a receivership are a charge upon  
27 the property administered." *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994).  
28 These expenses include the fees and expenses of this Receiver and his professionals,

1 including Allen Matkins. Decisions regarding the timing and amount of an award of  
2 fees and costs to the Receiver and his Professionals are committed to the sound  
3 discretion of the Court. See *SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992)  
4 (rev'd in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).

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

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

27 The Receiver promptly determined that experienced, qualified counsel was  
28 necessary due to the size and complexity of the receivership estate and the Court



1 agreed, specifically approving Allen Matkins' employment. Dkt. No. 152. The  
2 Court also approved the Receiver's proposal to file interim reports and fee  
3 applications on a quarterly basis. *Id.*

4 Allen Matkins has submitted a detailed fee application which describes the  
5 nature of the services rendered, and the identity and billing rate of each individual  
6 performing each task. *See* Exhibit A. Allen Matkins has endeavored to staff matters  
7 as efficiently as possible, while remaining cognizant of the complexity of issues.  
8 The request for fees is based on Allen Matkins' customary billing rates charged for  
9 comparable services provided in other matters, less a 10% discount.

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

## 20 V. CONCLUSION

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

- 22 1. Approving Allen Matkins' fees, on an interim basis, of \$109,918.35;
- 23 2. Authorizing and directing the Receiver to pay 80% of approved fees, or  
24 \$87,934.68, from the assets of the Receivership Entities;

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Dated: September 6, 2022

By: /s/ Edward Fates

# EXHIBIT A

08/10/22 17:20:33 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward      Matter #: 377432.00002      Client Name: Thomas C. Hebrank, as Receiver for PWCG  
(Ted)  
Date of Last Billing: 04/22/22      Matter Name: General Receivership  
Proforma Number: 1175461  
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		
04/01/22	8786564	Evaluate Receiver and ITM subpoenas, initial production, follow-up thereon (.6). Call with counsel for ITM21 related to the documents (.5). Prepare the draft of the objection to the subpoena to the Receiver (1.1).	Zaro, David	2.20	1,841.40	1,841.40	WO	HD	TR	_____
04/04/22	8789453	Work on the draft of the objection to the subpoena from Receiver (.6). Work on the objection to subpoena by ITM21st, follow-up (.6). Calls with the Receiver related to response and follow-up with counsel (.4).	Zaro, David	1.60	1,339.20	3,180.60	WO	HD	TR	_____
04/05/22	8790885	Revise the letter to counsel and Receiver regarding objections to subpoenas (.6). Email with SEC counsel regarding discovery (.3). Email to Receiver and ITM, follow-up on draft objections and call related to production (.6).	Zaro, David	1.50	1,255.50	4,436.10	WO	HD	TR	_____
04/06/22	8790978	Work on the production of the records and email from Receiver.	Zaro, David	0.40	334.80	4,770.90	WO	HD	TR	_____
04/07/22	8791001	Address revisions to the ITM objection to document production and Receiver's	Zaro, David	1.40	1,171.80	5,942.70	WO	HD	TR	_____

08/10/22 17:20:33 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	
		objections (.7). Emails with Receiver and ITM related to objections (.7).							
04/07/22	8792368	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.30	94.50	6,037.20	WO	HD	TR _____
04/08/22	8791114	Work on revisions, emails regarding Receiver's and ITM's objections to subpoena, follow-up with Receiver (.6). Prepare for/attend meeting with ITM re: production of records and further revisions to objection (.8). Follow-up on the meeting with ITM and address objection (.4).	Zaro, David	1.60	1,339.20	7,376.40	WO	HD	TR _____
04/11/22	8791994	Emails with Receiver and ITM counsel regarding production of records (.4). Review existing protective order and call with counsel for defendants regarding subpoena, extension and protective order (.5).	Zaro, David	0.90	753.30	8,129.70	WO	HD	TR _____
04/11/22	8792409	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.50	157.50	8,287.20	WO	HD	TR _____
04/12/22	8792433	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.50	157.50	8,444.70	WO	HD	TR _____
04/12/22	8793233	Review/evaluate documents produced by ITM, assess attorney/client privilege and work on the production (1.1). Work on the protective orders, emails with Receiver, ITM and defendant's counsel (.8).	Zaro, David	1.90	1,590.30	10,035.00	WO	HD	TR _____

08/10/22 17:20:33 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

**Fees for Matter 377432.00002.(General Receivership)**

<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>			
04/15/22	8797519	Several emails with Receiver and counsel related to subpoenas and production (.4). Emails with ITM related to the protective order (.4). Revise protective order, follow-up emails with ITM//SEC counsel and Defendants' counsel (.8).	Zaro, David	1.60	1,339.20	11,374.20	WO	HD	TR	_____
04/15/22	8797526	Several emails with Receiver, the SEC And counsel related to hearing and appearance.	Zaro, David	0.40	334.80	11,709.00	WO	HD	TR	_____
04/18/22	8798551	Emails with counsel for defendants related to the protective order terms and revisions (.6). Follow-up on Receiver production of records (.5).	Zaro, David	1.10	920.70	12,629.70	WO	HD	TR	_____
04/19/22	8799342	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.50	157.50	12,787.20	WO	HD	TR	_____
04/19/22	8801433	Emails with Defendants' counsel and SEC counsel related to ITM (.6). Follow-up on the protective order and respond to issues from Defendants as to terms and confidentiality (.4). Commence review of Receiver documents (.4). Emails/call with Receiver's counsel related to the Receiver's production of records per subpoena and follow-up with Defendants' counsel (.5). Call with counsel at SEC related to protective order (.4).	Zaro, David	2.30	1,925.10	14,712.30	WO	HD	TR	_____
04/20/22	8799361	Analysis and determination of responsive documents in preparation for attorney review.	Peng, Simona	0.20	63.00	14,775.30	WO	HD	TR	_____

08/10/22 17:20:33 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		
04/20/22	8803264	Emails/clal with Mr. Jones related to the discovery and protective order (.6). Follow-up with counsel related to ITM proposed revisions (.2). Review proposed revisions and emails to IM related to the protective order and follow-up (1.0).	Zaro, David	1.80	1,506.60	16,281.90	WO	HD	TR	
04/20/22	8811599	Conference and analysis re: production of documents by agent and protective order issues related to same.	Farrell, Michael	0.20	153.90	16,435.80	WO	HD	TR	
04/21/22	8800129	Advise on Receiver document production and privilege / work product issues (.4) communications with Receiver re: same (.1)	Fates, Edward (Ted)	0.50	321.75	16,757.55	WO	HD	TR	
04/21/22	8803290	Several emails with ITM and counsel as to the ITM protective order and proprietary/business records issues (.4). Follow-up emails related to ITM production issues (.3). Research/analysis of protective order issues/proprietary/trade secret issues and follow-up (.7). Review of Receiver production to prepare to respond to subpoena (.8). Prepare for/attend conference call with ITM in-house counsel regarding records, proprietary/trade secret (.4).	Zaro, David	2.60	2,176.20	18,933.75	WO	HD	TR	
04/25/22	8810495	Email with defendants and SEC counsel related to the production/protective order (.4). Follow-up with counsel as to the production/review of ITM/Hebrank documents (.5).	Zaro, David	0.90	753.30	19,687.05	WO	HD	TR	
04/27/22	8810811	Call/emails related to ITM subpoena as to deposition and follow-up (.4). Call with	Zaro, David	1.60	1,339.20	21,026.25	WO	HD	TR	

08/10/22 17:20:33 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	
		counsel, address email re: records production and protective order (.4). Email with counsel to produce records following review (.8).							
04/27/22	8811832	Finalize production of receivership documents.	Neglia, Ross	2.20	693.00	21,719.25	WO	HD	TR
04/28/22	8810881	Follow-up email with counsel for the Securities and Exchange Commission as to objections to subpoena and the records production (.4). Address several emails and call/email with Receiver counsel as to records production (.5).	Zaro, David	0.90	753.30	22,472.55	WO	HD	TR
04/29/22	8811021	Emails with counsel as to SEC And Defendants' document production (.4). Several emails/evaluate issues and approach to person most knowledgeable deposition of ITM/advice to ITM as to approach, follow-up with Defendants as to scope (.9).	Zaro, David	1.30	1,088.10	23,560.65	WO	HD	TR
04/29/22	8812255	Attention to issues with receivership production.	Neglia, Ross	0.60	189.00	23,749.65	WO	HD	TR
05/02/22	8817531	Address the protective order filing and follow-up (.4). Several emails with defendant's counsel related to the deposition (.5).	Zaro, David	0.90	753.30	24,502.95	WO	HD	TR
05/02/22	8821783	Identify relevant documents for production to counsel.	Neglia, Ross	1.10	346.50	24,849.45	WO	HD	TR
05/03/22	8817595	Evaluate the deposition subpoena/topics of deposition and follow-up (.4). Several	Zaro, David	1.20	1,004.40	25,853.85	WO	HD	TR



08/10/22 17:20:33 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	
		emails relates to the deposition of Mr. Tomasella, ITM scope and production, follow-up (.8).							
05/03/22	8822137	Resolve issues with parties' access to documents.	Neglia, Ross	1.20	378.00	26,231.85	WO	HD	TR _____
05/04/22	8818891	Emails related to the production of Receiver's records (.4). Follow-up on the documents/deposition preparation, work on the witness issues and emails with counsel for defendants as to the deposition (1.7).	Zaro, David	2.10	1,757.70	27,989.55	WO	HD	TR _____
05/05/22	8819888	Work with ITM related to the deposition preparation, emails with counsel for defendants/SEC (.6). Conferences with Receiver counsel related to discovery (.2).	Zaro, David	0.80	669.60	28,659.15	WO	HD	TR _____
05/05/22	8822150	Prepare corrected document production to parties.	Neglia, Ross	0.50	157.50	28,816.65	WO	HD	TR _____
05/06/22	8822608	Prepare for/attend meeting with ITM to prepare witness for the deposition (1.4). Email with counsel and witness related to the deposition (.3).	Zaro, David	1.70	1,422.90	30,239.55	WO	HD	TR _____
05/09/22	8821644	Analyze and advise on issues relating to ITM/21st deposition	Fates, Edward (Ted)	0.40	257.40	30,496.95	WO	HD	TR _____
05/09/22	8822800	Emails related to the ITM deposition with ITM (.3). Follow-up with counsel for defendants to obtain documents and further review of documents, prepare ITM witness for deposition (1.60). Review/evaluate the filing by SEC As to the trial, motion for summary judgment and discovery (.2).	Zaro, David	2.10	1,757.70	32,254.65	WO	HD	TR _____

08/10/22 17:20:33 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

**Fees for Matter 377432.00002.(General Receivership)**

<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>			
05/10/22	8823943	Emails with defendant's counsel and client/ITM related to maturity sums report, records and the deposition (.7). Prepare for/call with counsel, email and then attend the deposition of Mr. Tomisino/ITM, follow-up call (3.6). Further conferences with ITM and Receiver counsel (.4).	Zaro, David	4.70	3,933.90	36,188.55	WO	HD	TR	_____
06/10/22	8863787	Prepare for/attend the conference call with the SEC counsel and the Receiver as to status and prospective discovery, records and follow-up with Receiver.	Zaro, David	0.60	502.20	36,690.75	WO	HD	TR	_____
06/24/22	8874887	Follow-up on the ITM records production call from defendant's/Nationwide.	Zaro, David	0.30	251.10	36,941.85	WO	HD	TR	_____

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

<b>Trans Date</b>	<b>Index</b>	<b>Type</b>	<b>Quantity</b>	<b>Amt</b>				
04/01/22	2760549	EDISC – CS Disco, Inc. - Monthly Hosting for April 2022	0.00	150.00	WO	HD	TR	_____
04/01/22	2760586	EDISC – CS Disco, Inc. - Monthly Hosting for April 2022	0.00	541.41	WO	HD	TR	_____
04/01/22	2760590	EDISC – CS Disco, Inc. - Monthly Hosting for April 2022	0.00	150.00	WO	HD	TR	_____
04/05/22	2759728	MEDIT – JAMS, Inc. - Deposit for services - Hon. Raymond J. Ikola	0.00	126.00	WO	HD	TR	_____
04/07/22	2761225	DCSRCH – Document Search - - PACER - 1/22 - 3/22 Usage	0.00	0.20	WO	HD	TR	_____
04/07/22	2761226	DCSRCH – Document Search - - PACER - 1/22 - 3/22 Usage	0.00	3.20	WO	HD	TR	_____
05/01/22	2765476	EDISC – CS Disco, Inc. - Monthly Hosting for May 2022	0.00	150.00	WO	HD	TR	_____

08/10/22 17:20:33 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				
05/01/22	2765511	EDISC – CS Disco, Inc. - Monthly Hosting for May 2022	0.00	544.05	WO	HD	TR	_____
05/01/22	2765515	EDISC – CS Disco, Inc. - Monthly Hosting for May 2022	0.00	150.00	WO	HD	TR	_____
05/10/22	2764879	DCSRCH – Case Anywhere LLC - System Access Fee (2/1/22 - 4/30/22)	0.00	120.00	WO	HD	TR	_____
06/01/22	2769544	EDISC – CS Disco, Inc. - Monthly Hosting for June 2022	0.00	150.00	WO	HD	TR	_____
06/01/22	2769579	EDISC – CS Disco, Inc. - Monthly Hosting for June 2022	0.00	542.73	WO	HD	TR	_____
06/01/22	2769583	EDISC – CS Disco, Inc. - Monthly Hosting for June 2022	0.00	150.00	WO	HD	TR	_____

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	40.40	837.00	33,814.80
000739	Farrell, Michael	0.20	769.50	153.90
001665	Fates, Edward (Ted)	0.90	643.50	579.15
002307	Peng, Simona	2.00	315.00	630.00
002448	Neglia, Ross	5.60	315.00	1,764.00
		<u>49.10</u>		<u>\$36,941.85</u>
Subtotal Fees				\$36,941.85
Discount				0.00
Total Fees				36,941.85
Total Disbursements				2,777.59

**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

08/10/22 17:20:33 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

**Account Summary – As Of 08/10/22**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	45,713.89	42,936.30	2,777.59	175,910.52	157,402.80	18,507.72
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
<b>WIP</b>	<b>53,725.91</b>	<b>42,936.30</b>	<b>10,789.61</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

08/10/22 17:20:34 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: 1175461  
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	
04/25/22	8803310	Work on Receiver's 17th interim report (1.3) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.50	965.25	965.25	WO	HD	TR
05/04/22	8817295	Revise and finalize Receiver's 17th interim report and recommendations (.4) meet and confer communications with SEC counsel (.2)	Fates, Edward (Ted)	0.60	386.10	1,351.35	WO	HD	TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.10	643.50	1,351.35
		2.10		\$1,351.35
Subtotal Fees				\$1,351.35
Discount				0.00
Total Fees				1,351.35
Total Disbursements				0.00

**Attorney Billing Instructions**

( ) BILL ALL      ( ) Hold  
( ) BILL FEES ONLY      ( ) Write Off

08/10/22 17:20:34 PROFORMA STATEMENT FOR MATTER 377432.00004 (Thomas C. Hebrank, as Receiver for PWCG) (Reporting)

( ) 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 08/10/22**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	358.20	358.20	0.00	7,355.25	7,355.25	0.00	59,109.15	53,311.05	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
<b><i>WIP</i></b>	<b><i>Total</i></b>	<b><i>Fees</i></b>	<b><i>Costs</i></b>						
<b><i>Balance</i></b>	<b><i>7,355.25</i></b>	<b><i>7,355.25</i></b>	<b><i>0.00</i></b>						
<b><i>AR Balance</i></b>	<b><i>0.00</i></b>	<b><i>0.00</i></b>	<b><i>0.00</i></b>						
<b><i>Unalloc</i></b>	<b><i>0.00</i></b>								
<b><i>Payment</i></b>									
<b><i>Client Trust</i></b>	<b><i>0.00</i></b>								
<b><i>Balance</i></b>									

**Billing Address**

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

08/10/22 17:20:35 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: 1175461  
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
04/20/22	8798511	Review and advise Receiver re: update to investors on status of portfolio of policies	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
				\$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



08/10/22 17:20:35 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

**Account Summary – As Of 08/10/22**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	550.80	550.80	0.00	808.20	808.20	0.00	147,311.10	147,311.10	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
<b><i>WIP</i></b>	<b><i>Total</i></b>	<b><i>Fees</i></b>	<b><i>Costs</i></b>						
<b><i>Balance</i></b>	<b><i>808.20</i></b>	<b><i>808.20</i></b>	<b><i>0.00</i></b>						
<b><i>AR Balance</i></b>	<b><i>0.00</i></b>	<b><i>0.00</i></b>	<b><i>0.00</i></b>						
<b><i>Unalloc</i></b>	<b><i>0.00</i></b>								
<b><i>Payment</i></b>									
<b><i>Client Trust</i></b>	<b><i>0.00</i></b>								
<b><i>Balance</i></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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08/10/22 17:20:37 PROFORMA STATEMENT FOR MATTER 377432.00009 (Thomas C. Hebrank, as Receiver for PWCG) (Employment/Fees)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward (Ted)  
Date of Last Billing: 04/22/22  
Proforma Number: 1175461  
Client/Matter Joint Group # 377432-1

Matter #: 377432.00009

Client Name: Thomas C. Hebrank, as Receiver for PWCG  
Matter Name: Employment/Fees  
Client Matter Number:

**Fees for Matter 377432.00009.(Employment/Fees)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
04/18/22	8798544	Prepare for/attend the hearing related to fee applications of Receiver, Accountant and counsel, follow-up.	Zaro, David	0.60	502.20	502.20	WO	HD TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.60	837.00	502.20
		0.60		\$502.20
Subtotal Fees				\$502.20
Discount				0.00
Total Fees				502.20
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

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

08/10/22 17:20:37 PROFORMA STATEMENT FOR MATTER 377432.00009 (Thomas C. Hebrank, as Receiver for PWCG) (Employment/Fees)

**Account Summary – As Of 08/10/22**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	619.65	619.65	0.00	2,647.35	2,647.35	0.00	10,297.80	10,297.80	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
<b><i>WIP</i></b>	<b><i>2,647.35</i></b>	<b><i>2,647.35</i></b>	<b><i>0.00</i></b>						
<b><i>Balance</i></b>									
<b><i>AR Balance</i></b>	<b><i>0.00</i></b>	<b><i>0.00</i></b>	<b><i>0.00</i></b>						
<b><i>Unalloc</i></b>	<b><i>0.00</i></b>								
<b><i>Payment</i></b>									
<b><i>Client Trust</i></b>	<b><i>0.00</i></b>								
<b><i>Balance</i></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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08/10/22 17:20:38 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: 1175461

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	
04/01/22	8808486		Farrell, Michael	0.40	307.80	307.80	WO	HD	TR
04/06/22	8785692		Fates, Edward (Ted)	0.40	257.40	565.20	WO	HD	TR
04/06/22	8790983		Zaro, David	0.70	585.90	1,151.10	WO	HD	TR
04/06/22	8808637		Farrell, Michael	0.20	153.90	1,305.00	WO	HD	TR
04/07/22	8791097		Zaro, David	0.40	334.80	1,639.80	WO	HD	TR
04/08/22	8791141		Zaro, David	0.40	334.80	1,974.60	WO	HD	TR
04/08/22	8809065		Farrell, Michael	0.90	692.55	2,667.15	WO	HD	TR

08/10/22 17:20:38 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			
04/11/22	8789806		Fates, Edward (Ted)	0.60	386.10	3,053.25	WO	HD	TR	_____
04/11/22	8793212		Zaro, David	1.90	1,590.30	4,643.55	WO	HD	TR	_____
04/11/22	8809694		Farrell, Michael	1.10	846.45	5,490.00	WO	HD	TR	_____
04/12/22	8793243		Zaro, David	2.30	1,925.10	7,415.10	WO	HD	TR	_____
04/12/22	8809847		Farrell, Michael	0.60	461.70	7,876.80	WO	HD	TR	_____
04/13/22	8793303		Zaro, David	1.60	1,339.20	9,216.00	WO	HD	TR	_____
04/13/22	8810274		Farrell, Michael	0.40	307.80	9,523.80	WO	HD	TR	_____

08/10/22 17:20:38 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	
04/14/22	8792905		Fates, Edward (Ted)	3.10	1,994.85	11,518.65	WO	HD	TR _____
04/14/22	8797469		Zaro, David	2.40	2,008.80	13,527.45	WO	HD	TR _____
04/14/22	8810472		Farrell, Michael	1.90	1,462.05	14,989.50	WO	HD	TR _____
04/15/22	8810756		Farrell, Michael	0.90	692.55	15,682.05	WO	HD	TR _____
04/18/22	8795490		Fates, Edward (Ted)	0.30	193.05	15,875.10	WO	HD	TR _____
04/18/22	8798546		Zaro, David	0.60	502.20	16,377.30	WO	HD	TR _____
04/18/22	8810872		Farrell, Michael	0.50	384.75	16,762.05	WO	HD	TR _____

08/10/22 17:20:38 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	
04/19/22	8797468		Fates, Edward (Ted)	0.20	128.70	16,890.75	WO	HD	TR
04/19/22	8801454		Zaro, David	0.40	334.80	17,225.55	WO	HD	TR
04/19/22	8811407		Farrell, Michael	1.70	1,308.15	18,533.70	WO	HD	TR
04/20/22	8798387		Fates, Edward (Ted)	0.80	514.80	19,048.50	WO	HD	TR
04/20/22	8803256		Zaro, David	1.90	1,590.30	20,638.80	WO	HD	TR
04/20/22	8811655		Farrell, Michael	2.90	2,231.55	22,870.35	WO	HD	TR



08/10/22 17:20:38 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	
04/21/22	8799645		Fates, Edward (Ted)	0.70	450.45	23,320.80	WO	HD	TR _____
04/21/22	8803293		Zaro, David	1.10	920.70	24,241.50	WO	HD	TR _____
04/21/22	8813608		Farrell, Michael	2.20	1,692.90	25,934.40	WO	HD	TR _____
04/22/22	8801199		Fates, Edward (Ted)	0.40	257.40	26,191.80	WO	HD	TR _____
04/22/22	8808558		Zaro, David	0.50	418.50	26,610.30	WO	HD	TR _____
04/22/22	8813711		Farrell, Michael	1.60	1,231.20	27,841.50	WO	HD	TR _____

08/10/22 17:20:38 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			
04/27/22	8806401		Fates, Edward (Ted)	0.20	128.70	27,970.20	WO	HD	TR	_____
04/27/22	8806996		Farrell, Michael	0.20	153.90	28,124.10	WO	HD	TR	_____
04/27/22	8810817		Zaro, David	0.20	167.40	28,291.50	WO	HD	TR	_____
04/28/22	8808018		Fates, Edward (Ted)	0.20	128.70	28,420.20	WO	HD	TR	_____
04/28/22	8809458		Farrell, Michael	0.30	230.85	28,651.05	WO	HD	TR	_____
04/28/22	8810877		Zaro, David	0.40	334.80	28,985.85	WO	HD	TR	_____
05/03/22	8843922		Farrell, Michael	0.20	153.90	29,139.75	WO	HD	TR	_____
05/04/22	8843984		Farrell, Michael	0.40	307.80	29,447.55	WO	HD	TR	_____

08/10/22 17:20:38 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			
05/05/22	8819886		Zaro, David	0.60	502.20	29,949.75	WO	HD	TR	_____
05/05/22	8844022		Farrell, Michael	0.60	461.70	30,411.45	WO	HD	TR	_____
05/11/22	8825041		Zaro, David	0.70	585.90	30,997.35	WO	HD	TR	_____
05/11/22	8845485		Farrell, Michael	0.40	307.80	31,305.15	WO	HD	TR	_____
05/12/22	8826069		Fates, Edward (Ted)	0.80	514.80	31,819.95	WO	HD	TR	_____
05/12/22	8828168		Zaro, David	1.70	1,422.90	33,242.85	WO	HD	TR	_____
05/12/22	8846098		Farrell, Michael	0.60	461.70	33,704.55	WO	HD	TR	_____

08/10/22 17:20:38 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

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

<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>			
05/13/22	8826173		Fates, Edward (Ted)	1.30	836.55	34,541.10	WO	HD	TR	_____
05/13/22	8830954		Zaro, David	2.90	2,427.30	36,968.40	WO	HD	TR	_____
05/13/22	8846242		Farrell, Michael	2.60	2,000.70	38,969.10	WO	HD	TR	_____
05/15/22	8846287		Farrell, Michael	0.30	230.85	39,199.95	WO	HD	TR	_____

08/10/22 17:20:38 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			
05/16/22	8832327		Zaro, David	0.80	669.60	39,869.55	WO	HD	TR	_____
05/16/22	8846515		Farrell, Michael	0.50	384.75	40,254.30	WO	HD	TR	_____
05/17/22	8846599		Farrell, Michael	0.30	230.85	40,485.15	WO	HD	TR	_____
05/18/22	8846651		Farrell, Michael	1.70	1,308.15	41,793.30	WO	HD	TR	_____
05/19/22	8832395		Fates, Edward (Ted)	0.40	257.40	42,050.70	WO	HD	TR	_____
05/19/22	8833894		Zaro, David	0.60	502.20	42,552.90	WO	HD	TR	_____
05/19/22	8846763		Farrell, Michael	1.70	1,308.15	43,861.05	WO	HD	TR	_____

08/10/22 17:20:38 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			
05/20/22	8834097		Fates, Edward (Ted)	0.30	193.05	44,054.10	WO	HD	TR	_____
05/20/22	8834499		Farrell, Michael	0.90	692.55	44,746.65	WO	HD	TR	_____
05/20/22	8836334		Zaro, David	1.40	1,171.80	45,918.45	WO	HD	TR	_____
05/25/22	8840780		Zaro, David	0.30	251.10	46,169.55	WO	HD	TR	_____
05/25/22	8841636		Farrell, Michael	0.60	461.70	46,631.25	WO	HD	TR	_____
05/27/22	8843114		Farrell, Michael	0.40	307.80	46,939.05	WO	HD	TR	_____

08/10/22 17:20:38 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		
05/27/22	8848129		Zaro, David	0.30	251.10	47,190.15	WO	HD	TR	_____
05/31/22	8849783		Pham, Matt D.	0.10	41.40	47,231.55	WO	HD	TR	_____
05/31/22	8849845		Farrell, Michael	1.70	1,308.15	48,539.70	WO	HD	TR	_____
06/01/22	8851833		Zaro, David	0.90	753.30	49,293.00	WO	HD	TR	_____
06/01/22	8867555		Fates, Edward (Ted)	0.40	257.40	49,550.40	WO	HD	TR	_____
06/01/22	8877184		Farrell, Michael	0.90	692.55	50,242.95	WO	HD	TR	_____
06/02/22	8854383		Zaro, David	0.30	251.10	50,494.05	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		
06/02/22	8877955		Farrell, Michael	0.40	307.80	50,801.85	WO	HD	TR	_____
06/03/22	8858964		Zaro, David	0.60	502.20	51,304.05	WO	HD	TR	_____
06/03/22	8878157		Farrell, Michael	0.50	384.75	51,688.80	WO	HD	TR	_____
06/06/22	8858991		Zaro, David	0.30	251.10	51,939.90	WO	HD	TR	_____
06/06/22	8867898		Fates, Edward (Ted)	0.60	386.10	52,326.00	WO	HD	TR	_____
06/06/22	8878238		Farrell, Michael	0.60	461.70	52,787.70	WO	HD	TR	_____
06/07/22	8859004		Zaro, David	0.70	585.90	53,373.60	WO	HD	TR	_____
06/07/22	8878326		Farrell, Michael	1.30	1,000.35	54,373.95	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	
06/08/22	8862427		Zaro, David	0.40	334.80	54,708.75	WO	HD	TR _____
06/08/22	8878398		Farrell, Michael	1.10	846.45	55,555.20	WO	HD	TR _____
06/13/22	8862780		Farrell, Michael	0.80	615.60	56,170.80	WO	HD	TR _____
06/13/22	8863809		Zaro, David	0.30	251.10	56,421.90	WO	HD	TR _____
06/14/22	8864880		Zaro, David	0.90	753.30	57,175.20	WO	HD	TR _____
06/14/22	8878657		Farrell, Michael	1.10	846.45	58,021.65	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		
06/16/22	8878732		Farrell, Michael	0.20	153.90	58,175.55	WO	HD	TR	_____
06/17/22	8868719		Fates, Edward (Ted)	0.80	514.80	58,690.35	WO	HD	TR	_____
06/17/22	8879559		Farrell, Michael	0.50	384.75	59,075.10	WO	HD	TR	_____
06/20/22	8867220		Fates, Edward (Ted)	4.30	2,767.05	61,842.15	WO	HD	TR	_____
06/20/22	8879659		Farrell, Michael	0.30	230.85	62,073.00	WO	HD	TR	_____
06/21/22	8871376		Fates, Edward (Ted)	2.40	1,544.40	63,617.40	WO	HD	TR	_____
06/21/22	8879808		Farrell, Michael	0.50	384.75	64,002.15	WO	HD	TR	_____
06/22/22	8873213		Zaro, David	0.40	334.80	64,336.95	WO	HD	TR	_____
06/22/22	8880572		Farrell, Michael	1.10	846.45	65,183.40	WO	HD	TR	_____

08/10/22 17:20:38 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			
06/23/22	8871063		Fates, Edward (Ted)	0.90	579.15	65,762.55	WO	HD	TR	_____
06/23/22	8873236		Zaro, David	1.30	1,088.10	66,850.65	WO	HD	TR	_____
06/23/22	8880760		Farrell, Michael	1.10	846.45	67,697.10	WO	HD	TR	_____
06/23/22	8882991		Pham, Matt D.	0.80	331.20	68,028.30	WO	HD	TR	_____
06/27/22	8875161		Fates, Edward (Ted)	0.20	128.70	68,157.00	WO	HD	TR	_____

08/10/22 17:20:38 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	
06/27/22	8877115		Farrell, Michael	1.70	1,308.15	69,465.15	WO	HD	TR
06/29/22	8877901		Fates, Edward (Ted)	1.30	836.55	70,301.70	WO	HD	TR
06/29/22	8882758		Farrell, Michael	0.90	692.55	70,994.25	WO	HD	TR

**Proforma Summary**

Timekeeper				
Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	30.20	837.00	25,277.40
000739	Farrell, Michael	41.70	769.50	32,088.15
001665	Fates, Edward (Ted)	20.60	643.50	13,256.10
002510	Pham, Matt D.	0.90	414.00	372.60
		93.40		\$70,994.25
Subtotal Fees				\$70,994.25
Discount				0.00
Total Fees				70,994.25
Total Disbursements				0.00

**Attorney Billing Instructions**

08/10/22 17:20:38 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

( )	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 08/10/22**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	14,930.10	14,930.10	0.00	247,509.45	247,509.45	0.00	443,454.75	443,454.75	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
<b>WIP</b>	<b>247,509.45</b>	<b>247,509.45</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