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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)

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

Date: February 27, 2023
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 July 1, 2022, through September 30, 2022 ("Nineteenth
 6 Application Period"), and seeks interim approval of \$71,391.60 in fees and
 7 \$2,650.39 in expenses, and an order authorizing the Receiver to pay, on an interim
 8 basis, 80% of the fees incurred (\$57,113.28) 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 Nineteenth Interim Report ("Nineteenth Report") filed on November 10, 2022 (Dkt. No. 513), which describes in detail the Receiver's activities during the Nineteenth Application Period. This Application seeks interim approval of \$71,391.60 in fees for a total of 92 hours worked, and payment on an interim basis of 80% of that amount, or \$57,113.28. The work performed is described task-by-task on Exhibit A and is broken down into the following categories:

Category	Hours	Amount
General Receivership	1.30	\$1,164.15
Asset Investigation & Recovery	0.70	\$626.85
Reporting	2.70	\$1,941.75
Claims & Distributions	5.10	\$3,511.35
Employment/Fees	0.90	\$619.65
MPC Litigation	81.30	\$63,527.85
Total	92.00	\$71,391.60

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 advising the Receiver regarding the ongoing litigation between the Securities and Exchange Commission and the remaining Defendants in the case, including anticipated testimony from the Receiver at trial. The reasonable and necessary fees for work in this category total \$1,164.15.

2. Asset Investigation & Recovery

Allen Matkins' time in this category focused on advising the Receiver regarding the ongoing maintenance and management of life insurance policies including in the receivership estate. The reasonable and necessary fees for work in this category total \$626.85.

3. Reporting

Allen Matkins' time in this category focused on preparing the Receiver's Eighteenth Interim Report. Dkt. 499. The report contains detailed descriptions of the Receiver's activities during the second quarter of 2022, policy maturities, investor communications, pending litigation, tax issues, and post-receivership receipts and disbursements. The report also includes the Receiver's recommendations for the continued administration of the receivership estate. The reasonable and necessary fees for work in this category total \$1,941.75.

4. Claims & Distributions

Allen Matkins assisted the Receiver in providing updates to investors through the receivership website. The reasonable and necessary fees for work in this category total \$3,511.35.

5. Employment/Fees

Although fee applications are a necessary component of federal equity receiverships, Allen Matkins does not charge any time for preparing its own fee

1 applications. The firm assisted in preparing interim fee applications for the
 2 Receiver and his tax accountant. The reasonable and necessary fees for work in this
 3 category total \$619.65.

4 6. MP&C Litigation¹

5 The majority of Allen Matkins' work during the Nineteenth Application
 6 Period focused on the Receiver's claims against Mills Potoczak & Company
 7 ("MPC") on behalf of PWCG Trust (the Receiver's Complaint against MPC was
 8 previously filed on September 3, 2020) and settlement of those claims. The firm's
 9 diligent work during the third quarter, in coordination with counsel for the investor
 10 class in the Los Angeles Superior Court ("LASC") cases, directly lead to execution
 11 of a favorable Settlement Agreement for \$9.75 million settlement out of \$10 million
 12 in available insurance coverage (\$5 million in primary coverage and \$5 million in
 13 excess coverage).

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

23 As a result of the delay caused by MPC's insurance carriers, a stipulation and
 24 order extending the dates and deadlines in the Receiver's case against MPC was
 25 prepared, filed with the Court, and approved by the Court. At that point, to the
 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.

Receiver's surprise, one of the class representatives in the state court actions refused to sign the Settlement Agreement, demanding a greater service award for acting as a class representative. This issue was addressed through status reports and status conferences with Judge Riff, who now has the two related state court cases. After the issue was resolved, the Settlement Agreement was amended to provide for a larger proposed service award to each class representative, and the agreement was then fully executed.

A motion for preliminary approval of the Settlement Agreement, including supporting declarations and the proposed class notice, was prepared and filed in the LASC on September 30, 2022. The motion was initially set for hearing on November 22, 2022, but the hearing was recently continued by the LASC to March 28, 2023, and a checklist of concerns with the class settlement notice and administration process was provided by the court. The Receiver and class counsel plan to address the concerns raised promptly and request that the hearing date be advanced.

The Receiver intends to file a motion for approval of the Settlement Agreement in this Court once preliminary approval of the class settlement has been obtained from the LASC and the class notices have gone out to class members. The reasonable and necessary fees for work in this category total \$63,527.85.

B. Summary of Expenses Requested for Reimbursement

Allen Matkins requests the Court approve reimbursement of \$2,650.39 in out-of-pocket costs. The itemization of such expenses is summarized below by category.

Category	Total
E-Discovery	\$2,528.19
Document Searches (incl. PACER, Lexis, Sec. of State)	\$122.20
TOTAL	\$2,650.39

FEES AND COSTS INCURRED AND PAID TO DATE

From inception of the receivership through September 30, 2022, the Receiver incurred fees and costs of \$555,939.14, of which amount \$104,170.41 is subject to holdback pending approval of the Receiver's final fee application at the conclusion of the receivership, \$11,157.57 is awaiting the Court's review and approval, and \$442,570.46 has been approved by the Court and paid to date. During the same time period, Allen Matkins has incurred fees and costs of \$1,570,799.20, of which amount \$307,117.44 is subject to holdback pending approval of Allen Matkins' final fee application at the conclusion of the receivership, \$74,041.99 is awaiting the Court's review and approval, and \$1,203,918.09 has been approved by the Court and paid to date.

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

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

In allowing fees, a court should consider "the time, labor and skill required, but not necessarily that actually expended, in the proper performance of the duties imposed by the court upon the receiver[], the fair value of such time, labor and skill measured by conservative business standards, the degree of activity, integrity and dispatch with which the work is conducted and the result obtained." *United States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted). In practical terms, receiver and professional compensation thus ultimately rests upon the result of an equitable, multi-factor balancing test involving the

1 "economy of administration, the burden that the estate may be able to bear, the
2 amount of time required, although not necessarily expended, and the overall value of
3 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d 232, 237 (3d Cir.
4 1970). Regardless of how this balancing test is formulated, no single factor is
5 determinative and "a reasonable fee is based [upon] all circumstances surrounding
6 the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*,
7 374 F. Supp. 465, 480 (S.D. Tex. 1974).

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

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

20 Allen Matkins has submitted a detailed fee application which describes the
21 nature of the services rendered, and the identity and billing rate of each individual
22 performing each task. *See* Exhibit A. Allen Matkins has endeavored to staff matters
23 as efficiently as possible, while remaining cognizant of the complexity of issues.
24 The request for fees is based on Allen Matkins' customary billing rates charged for
25 comparable services provided in other matters, less a 10% discount. Moreover,
26 Allen Matkins wrote off and did not charge for 1.1 hours of work (\$757.35 in fees).

27 The work performed by Allen Matkins was essential to carrying out the
28 Receiver's Court-ordered duties. The Receiver and Allen Matkins have worked

1 diligently since the Receiver's appointment to preserve and protect the assets of the
 2 receivership estate, to investigate potential claims against third parties, and to
 3 maximize the funds available for ultimate distribution to investors. Moreover, Allen
 4 Matkins seeks payment of only 80% of fees incurred on an interim basis in
 5 recognition of the fact that its work in assisting the Receiver is ongoing. Payment of
 6 the proposed 20% holdback will be sought at the conclusion of the receivership.
 7 Allen Matkins' fees are fair and reasonable and should be approved and paid on an
 8 interim basis.

9 V. CONCLUSION

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

- 11 1. Approving Allen Matkins' fees, on an interim basis, of \$71,391.60;
- 12 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
 13 \$57,113.28, from the assets of the Receivership Entities;
- 14 3. Approving Allen Matkins' costs in the amount of \$2,650.39 and
 15 authorizing and directing the Receiver to reimburse such costs in full; and
- 16 4. For such other and further relief as the Court deems appropriate.

17
 18 Dated: January 19, 2023

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

19 By: /s/ Edward Fates

20 EDWARD G. FATES
 21 Attorneys for Receiver
 22 THOMAS HEBRANK
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EXHIBIT A

11/30/22 09:11:50 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: 11/17/22 Matter Name: General Receivership
Proforma Number: 1189998
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	
07/22/22	8906301	Several emails with counsel as to the SEC action and Receiver as witness at trial, discovery issues.	Zaro, David	0.40	358.20	358.20	WO	HD	TR
07/25/22	8908511	Evaluate the SEC's motion for summary judgment as to the remaining defendants (.5). Call with counsel as to the report and fee application, follow-up on remaining party to settlement and call with counsel (.4).	Zaro, David	0.90	805.95	1,164.15	WO	HD	TR

Disbursements for Matter 377432.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	Circle	Action	
07/01/22	2774657	EDISC – CS Disco, Inc. - Monthly Hosting for July 2022	0.00	150.00	WO	HD	TR
07/01/22	2774693	EDISC – CS Disco, Inc. - Monthly Hosting for July 2022	0.00	150.00	WO	HD	TR
07/01/22	2774696	EDISC – CS Disco, Inc. - Monthly Hosting for July 2022	0.00	542.73	WO	HD	TR
07/07/22	2781892	DCSRCH – Document Search - PACER - 04/22 - 06/22 Usage	0.00	1.10	WO	HD	TR

11/30/22 09:11:50 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	WO	HD	TR	
07/07/22	2781893	DCSRCH – Document Search - PACER - 04/22 - 06/22 Usage	0.00	1.10	WO	HD	TR	_____
08/01/22	2778594	EDISC – CS Disco, Inc. - Monthly Hosting for August 2022	0.00	150.00	WO	HD	TR	_____
08/01/22	2778628	EDISC – CS Disco, Inc. - Monthly Hosting for August 2022	0.00	150.00	WO	HD	TR	_____
08/01/22	2778631	EDISC – CS Disco, Inc. - Monthly Hosting for August 2022	0.00	542.73	WO	HD	TR	_____
08/07/22	2777239	DCSRCH – Case Anywhere LLC - System Access Fee (5/1/22 - 7/31/22)	0.00	120.00	WO	HD	TR	_____
09/01/22	2782388	EDISC – CS Disco, Inc. - Monthly Hosting for September 2022	0.00	150.00	WO	HD	TR	_____
09/01/22	2782422	EDISC – CS Disco, Inc. - Monthly Hosting for September 2022	0.00	150.00	WO	HD	TR	_____
09/01/22	2782425	EDISC – CS Disco, Inc. - Monthly Hosting for September 2022	0.00	542.73	WO	HD	TR	_____

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	1.30	895.50	1,164.15
		1.30		\$1,164.15
Subtotal Fees				\$1,164.15
Discount				0.00
Total Fees				1,164.15
Total Disbursements				2,650.39

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

11/30/22 09:11:50 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

Account Summary – As Of 11/30/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,417.85	2,417.85	0.00	58,101.42	45,354.15	12,747.27	188,298.05	159,820.65	28,477.40
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	2,119.59	15.03	2,104.56
Billed	53,033.18	42,936.30	10,096.88	63,368.65	50,676.30	12,692.35	157,397.31	157,397.31	25,827.01
Collected	53,033.18	42,936.30	10,096.88	63,368.65	50,676.30	12,692.35	183,224.32	157,397.31	25,827.01
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	Total	Fees	Costs						
Balance	6,460.70	2,417.85	4,042.85						
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

11/30/22 09:11:51 PROFORMA STATEMENT FOR MATTER 377432.00003 (Thomas C. Hebrank, as Receiver for PWCG) (Asset Investigation & Recovery)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward Matter #: 377432.00003 Client Name: Thomas C. Hebrank, as Receiver for PWCG
(Ted)
Date of Last Billing: 12/03/20 Matter Name: Asset Investigation & Recovery
Proforma Number: 1189998
Client/Matter Joint Group # 377432-1 Client Matter Number:

Fees for Matter 377432.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
09/09/22	8959889	Address the Receiver's accounting and cash flow, timing for revised LE analysis, follow-up emails among Receiver/investor counsel as to Receiver's next steps.	Zaro, David	0.70	626.85	626.85	WO	HD TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.70	895.50	626.85
		0.70		\$626.85
Subtotal Fees				\$626.85
Discount				0.00
Total Fees				626.85
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

11/30/22 09:11:51 PROFORMA STATEMENT FOR MATTER 377432.00003 (Thomas C. Hebrank, as Receiver for PWCG) (Asset Investigation & Recovery)

Account Summary – As Of 11/30/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	4,925.25	4,925.25	0.00	4,925.25	4,925.25	0.00	141,197.99	140,261.49	936.50
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.09	0.09	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	135,021.15	135,021.15	936.50
Collected	0.00	0.00	0.00	0.00	0.00	0.00	135,957.65	135,021.15	936.50
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	5,225.25	4,925.25	300.00						
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

11/30/22 09:11:52 PROFORMA STATEMENT FOR MATTER 377432.00004 (Thomas C. Hebrank, as Receiver for PWCG) (Reporting)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward Matter #: 377432.00004 Client Name: Thomas C. Hebrank, as Receiver for PWCG
(Ted)
Date of Last Billing: 11/17/22 Matter Name: Reporting
Proforma Number: 1189998
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	
08/04/22	8922898	Call/email regarding Receiver Report, fee application and follow-up with counsel.	Zaro, David	0.40	358.20	358.20	WO	HD	TR
08/22/22	8934889	Work on Receiver's 18th interim report (1.1) communications with Receiver re: same (.1)	Fates, Edward (Ted)	1.20	826.20	1,184.40	WO	HD	TR
08/24/22	8937966	Discuss revisions to 18th interim report with Receiver (.4) work on same (.3)	Fates, Edward (Ted)	0.70	481.95	1,666.35	WO	HD	TR
09/06/22	8953850	Meet and confer with SEC counsel re: interim report (.2) finalize same (.2)	Fates, Edward (Ted)	0.40	275.40	1,941.75	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.40	895.50	358.20
001665	Fates, Edward (Ted)	2.30	688.50	1,583.55
		2.70		\$1,941.75
Subtotal Fees				\$1,941.75
Discount				0.00
Total Fees				1,941.75
Total Disbursements				0.00

11/30/22 09:11:52 PROFORMA STATEMENT FOR MATTER 377432.00004 (Thomas C. Hebrank, as Receiver for PWCG) (Reporting)

Attorney Billing Instructions

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

Billing Instructions

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

Account Summary – As Of 11/30/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	5,054.40	5,054.40	0.00	12,051.45	12,051.45	0.00	63,805.35	58,007.25	5,798.10
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	6,997.05	6,997.05	0.00	18,768.00	12,969.90	5,798.10	52,952.85	52,952.85	5,798.10
Collected	6,997.05	6,997.05	0.00	18,768.00	12,969.90	5,798.10	58,750.95	52,952.85	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	5,054.40	5,054.40	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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

11/30/22 09:11:53 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: 11/17/22 Matter Name: Claims & Distributions
Proforma Number: 1189998
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	
08/05/22	8920451	Call/emails with investor regarding assignment of claim in receivership for estate planning and health reasons (.5) discuss same with Receiver and A. Herren (.3)	Fates, Edward (Ted)	0.80	550.80	550.80	WO	HD	TR
08/10/22	8925044	Communications with investor re: assignment of claim for health and estate planning purposes	Fates, Edward (Ted)	0.40	275.40	826.20	WO	HD	TR
08/18/22	8932146	Communications with elderly investor re: potential assignment of claim in receivership due to health concerns and estate planning issues (.5) prepare assignment form for investor signature (.9) communications with A. Herren re: same (.2)	Fates, Edward (Ted)	1.60	1,101.60	1,927.80	WO	HD	TR
08/23/22	8936378	Communications with Receiver re: assignment of investor claim (.2) communications with investor re: same (.2)	Fates, Edward (Ted)	0.40	275.40	2,203.20	WO	HD	TR
09/07/22	8954630	Advise Receiver re: responses to investor inquiries regarding further distributions and	Fates, Edward (Ted)	0.30	206.55	2,409.75	WO	HD	TR

11/30/22 09:11:53 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

Fees for Matter 377432.00006.(Claims & Distributions)

Trans Date	Index	Description of Service Rendered timing	Timekeeper	Hours	Fees	Sum	Circle Action			
09/09/22	8957162	Communications with claimant re: assignment of claim for estate planning purposes (.2) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.30	206.55	2,616.30	WO	HD	TR	_____
09/13/22	8977393	Respond to inquiries from investors re: distributions and assignment of claim	Fates, Edward (Ted)	0.30	206.55	2,822.85	WO	HD	TR	_____
09/19/22	8965267	Work on update for investors relating to MPC settlement and court approval process (.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.60	413.10	3,235.95	WO	HD	TR	_____
09/21/22	8967293	Communications with A. Herren and claimant re: assignment of claim in receivership (.2) respond to inquiry from investor re: distributions (.2)	Fates, Edward (Ted)	0.40	275.40	3,511.35	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	5.10	688.50	3,511.35
		5.10		\$3,511.35
Subtotal Fees				\$3,511.35
Discount				0.00
Total Fees				3,511.35
Total Disbursements				0.00

Attorney Billing Instructions

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

11/30/22 09:11:53 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

Billing Instructions

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

Account Summary – As Of 11/30/22

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	4,268.70	4,268.70	0.00	4,526.10	4,526.10	0.00	151,029.00	151,029.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	6.66	6.66	0.00
Billed	257.40	257.40	0.00	1,982.25	1,982.25	0.00	146,766.96	146,766.96	0.00
Collected	257.40	257.40	0.00	1,982.25	1,982.25	0.00	146,766.96	146,766.96	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	4,268.70	4,268.70	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

11/30/22 09:11:54 PROFORMA STATEMENT FOR MATTER 377432.00009 (Thomas C. Hebrank, as Receiver for PWCG) (Employment/Fees)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward Matter #: 377432.00009 Client Name: Thomas C. Hebrank, as Receiver for PWCG
(Ted)
Date of Last Billing: 11/17/22 Matter Name: Employment/Fees
Proforma Number: 1189998
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	
08/02/22	8916941	Revisions to Receiver and Duffy interim fee applications (.4) meet and confer communications with SEC counsel re: same (.2)	Fates, Edward (Ted)	0.60	413.10	413.10	WO	HD	TR
08/05/22	8920465	Meet and confer communications with SEC counsel re: fee applications (.1) finalize Receiver and Duffy fee applications, proposed orders and notice of hearing (.2)	Fates, Edward (Ted)	0.30	206.55	619.65	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.90	688.50	619.65
		0.90		\$619.65
Subtotal Fees				\$619.65
Discount				0.00
Total Fees				619.65
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL () Hold

11/30/22 09:11:54 PROFORMA STATEMENT FOR MATTER 377432.00009 (Thomas C. Hebrank, as Receiver for PWCG) (Employment/Fees)

() BILL FEES ONLY
 () BILL COST ONLY

() Write Off
 () 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 11/30/22

	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	2,027.70	2,027.70	0.00	3,778.65	3,778.65	0.00	9,685.26	9,685.26	0.00
Collected	2,027.70	2,027.70	0.00	3,778.65	3,778.65	0.00	9,685.26	9,685.26	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>619.65</i>	<i>619.65</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

11/30/22 09:11:56 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: 11/17/22 Matter Name: MP&C Litigation
Proforma Number: 1189998
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	
07/01/22	8886413		Fates, Edward (Ted)	0.30	206.55	206.55	WO	HD	TR
07/01/22	8887857		Zaro, David	0.90	805.95	1,012.50	WO	HD	TR
07/01/22	8909523		Farrell, Michael	0.30	247.05	1,259.55	WO	HD	TR
07/05/22	8885988		Fates, Edward (Ted)	0.70	481.95	1,741.50	WO	HD	TR
07/05/22	8887865		Zaro, David	1.10	985.05	2,726.55	WO	HD	TR

11/30/22 09:11:56 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)										
Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/05/22	8909616		Farrell, Michael	0.50	411.75	3,138.30	WO	HD	TR	_____
07/06/22	8886479		Fates, Edward (Ted)	0.20	137.70	3,276.00	WO	HD	TR	_____
07/06/22	8909657		Farrell, Michael	0.20	164.70	3,440.70	WO	HD	TR	_____
07/11/22	8890605		Fates, Edward (Ted)	1.30	895.05	4,335.75	WO	HD	TR	_____
07/11/22	8892051		Zaro, David	0.40	358.20	4,693.95	WO	HD	TR	_____
07/11/22	8910562		Farrell, Michael	0.90	741.15	5,435.10	WO	HD	TR	_____
07/12/22	8891985		Fates, Edward (Ted)	0.30	206.55	5,641.65	WO	HD	TR	_____
07/12/22	8893345		Zaro, David	0.30	268.65	5,910.30	WO	HD	TR	_____
07/12/22	8910625		Farrell, Michael	0.30	247.05	6,157.35	WO	HD	TR	_____

11/30/22 09:11:56 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)										
Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/13/22	8893131		Fates, Edward (Ted)	0.50	344.25	6,501.60	WO	HD	TR	_____
07/13/22	8894356		Zaro, David	1.60	1,432.80	7,934.40	WO	HD	TR	_____
07/14/22	8893807		Fates, Edward (Ted)	0.80	550.80	8,485.20	WO	HD	TR	_____
07/19/22	8901697		Fates, Edward (Ted)	0.30	206.55	8,691.75	WO	HD	TR	_____
07/19/22	8911188		Farrell, Michael	0.10	82.35	8,774.10	WO	HD	TR	_____
07/20/22	8899664		Fates, Edward (Ted)	0.70	481.95	9,256.05	WO	HD	TR	_____
07/22/22	8904314		Farrell, Michael	0.20	164.70	9,420.75	WO	HD	TR	_____
07/22/22	8906305		Zaro, David	0.70	626.85	10,047.60	WO	HD	TR	_____

11/30/22 09:11:56 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/26/22	8908549		Zaro, David	0.60	537.30	10,584.90	WO	HD	TR	_____
07/26/22	8913590		Farrell, Michael	1.20	988.20	11,573.10	WO	HD	TR	_____
07/28/22	8908742		Farrell, Michael	1.40	1,152.90	12,726.00	WO	HD	TR	_____
07/28/22	8909528		Zaro, David	1.10	985.05	13,711.05	WO	HD	TR	_____
08/02/22	8940441		Farrell, Michael	0.20	164.70	13,875.75	WO	HD	TR	_____
08/03/22	8918362		Fates, Edward (Ted)	0.60	413.10	14,288.85	WO	HD	TR	_____

11/30/22 09:11:56 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
08/03/22	8920197		Zaro, David	0.90	805.95	15,094.80	WO	HD	TR	_____
08/03/22	8940432		Farrell, Michael	1.10	905.85	16,000.65	WO	HD	TR	_____
08/09/22	8941205		Farrell, Michael	0.80	658.80	16,659.45	WO	HD	TR	_____
08/10/22	8923962		Fates, Edward (Ted)	0.30	206.55	16,866.00	WO	HD	TR	_____
08/10/22	8929322		Zaro, David	1.20	1,074.60	17,940.60	WO	HD	TR	_____
08/10/22	8941209		Farrell, Michael	1.30	1,070.55	19,011.15	WO	HD	TR	_____
08/11/22	8924808		Fates, Edward (Ted)	1.90	1,308.15	20,319.30	WO	HD	TR	_____

11/30/22 09:11:56 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
08/11/22	8929376		Zaro, David	0.60	537.30	20,856.60	WO	HD	TR	_____
08/11/22	8943245		Farrell, Michael	1.10	905.85	21,762.45	WO	HD	TR	_____
08/12/22	8926681		Fates, Edward (Ted)	0.40	275.40	22,037.85	WO	HD	TR	_____
08/12/22	8929403		Zaro, David	0.50	447.75	22,485.60	WO	HD	TR	_____
08/12/22	8943255		Farrell, Michael	0.30	247.05	22,732.65	WO	HD	TR	_____
08/17/22	8932120		Zaro, David	0.60	537.30	23,269.95	WO	HD	TR	_____
08/18/22	8931936		Fates, Edward (Ted)	1.80	1,239.30	24,509.25	WO	HD	TR	_____

11/30/22 09:11:56 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
08/18/22	8933244		Farrell, Michael	0.40	329.40	24,838.65	WO	HD	TR	_____
08/18/22	8934792		Zaro, David	0.40	358.20	25,196.85	WO	HD	TR	_____
08/19/22	8937973		Zaro, David	0.40	358.20	25,555.05	WO	HD	TR	_____
08/24/22	8938016		Fates, Edward (Ted)	0.40	275.40	25,830.45	WO	HD	TR	_____
08/24/22	8940559		Farrell, Michael	0.20	164.70	25,995.15	WO	HD	TR	_____
08/24/22	8953822		Zaro, David	0.40	358.20	26,353.35	WO	HD	TR	_____
08/25/22	8938658		Fates, Edward (Ted)	0.40	275.40	26,628.75	WO	HD	TR	_____
08/25/22	8940580		Farrell, Michael	0.40	329.40	26,958.15	WO	HD	TR	_____

11/30/22 09:11:56 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
08/29/22	8941758		Fates, Edward (Ted)	2.00	1,377.00	28,335.15	WO	HD	TR
08/29/22	8943271		Farrell, Michael	0.30	247.05	28,582.20	WO	HD	TR
08/29/22	8953916		Zaro, David	0.40	358.20	28,940.40	WO	HD	TR
08/30/22	8943706		Fates, Edward (Ted)	1.50	1,032.75	29,973.15	WO	HD	TR
08/30/22	8948593		Farrell, Michael	0.30	247.05	30,220.20	WO	HD	TR
08/30/22	8953919		Zaro, David	0.70	626.85	30,847.05	WO	HD	TR

11/30/22 09:11:56 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)										
Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
08/31/22	8947142		Fates, Edward (Ted)	0.20	137.70	30,984.75	WO	HD	TR	_____
08/31/22	8948606		Farrell, Michael	0.30	247.05	31,231.80	WO	HD	TR	_____
09/01/22	8953934		Zaro, David	0.40	358.20	31,590.00	WO	HD	TR	_____
09/01/22	8976552		Fates, Edward (Ted)	1.10	757.35	32,347.35	WO	HD	TR	_____
09/01/22	8979536		Farrell, Michael	0.20	164.70	32,512.05	WO	HD	TR	_____
09/06/22	8953942		Fates, Edward (Ted)	0.60	413.10	32,925.15	WO	HD	TR	_____
09/06/22	8979555		Farrell, Michael	0.30	247.05	33,172.20	WO	HD	TR	_____
09/07/22	8957061		Zaro, David	0.80	716.40	33,888.60	WO	HD	TR	_____

11/30/22 09:11:56 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
09/07/22	8976928		Fates, Edward (Ted)	0.40	275.40	34,164.00	WO	HD	TR	_____
09/08/22	8956017		Fates, Edward (Ted)	1.70	1,170.45	35,334.45	WO	HD	TR	_____
09/08/22	8979620		Farrell, Michael	0.40	329.40	35,663.85	WO	HD	TR	_____
09/09/22	8959886		Zaro, David	0.60	537.30	36,201.15	WO	HD	TR	_____
09/09/22	8976938		Fates, Edward (Ted)	1.50	1,032.75	37,233.90	WO	HD	TR	_____
09/09/22	8979963		Farrell, Michael	0.30	247.05	37,480.95	WO	HD	TR	_____
09/12/22	8959907		Zaro, David	0.80	716.40	38,197.35	WO	HD	TR	_____

11/30/22 09:11:56 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
09/13/22	8959393		Fates, Edward (Ted)	0.20	137.70	38,335.05	WO	HD	TR	_____
09/13/22	8980121		Farrell, Michael	0.20	164.70	38,499.75	WO	HD	TR	_____
09/14/22	8960747		Fates, Edward (Ted)	2.00	1,377.00	39,876.75	WO	HD	TR	_____
09/14/22	8980164		Farrell, Michael	0.40	329.40	40,206.15	WO	HD	TR	_____
09/16/22	8977510		Fates, Edward (Ted)	0.30	206.55	40,412.70	WO	HD	TR	_____
09/19/22	8964920		Fates, Edward (Ted)	0.90	619.65	41,032.35	WO	HD	TR	_____
09/19/22	8981307		Farrell, Michael	0.40	329.40	41,361.75	WO	HD	TR	_____
09/20/22	8966851		Farrell, Michael	0.50	411.75	41,773.50	WO	HD	TR	_____

11/30/22 09:11:56 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
09/20/22	8977580		Fates, Edward (Ted)	1.10	757.35	42,530.85	WO	HD	TR	_____
09/21/22	8967359		Fates, Edward (Ted)	0.20	137.70	42,668.55	WO	HD	TR	_____
09/21/22	8981356		Farrell, Michael	0.60	494.10	43,162.65	WO	HD	TR	_____
09/22/22	8968884		Fates, Edward (Ted)	1.90	1,308.15	44,470.80	WO	HD	TR	_____
09/22/22	8974146		Zaro, David	0.60	537.30	45,008.10	WO	HD	TR	_____
09/22/22	8981577		Farrell, Michael	2.60	2,141.10	47,149.20	WO	HD	TR	_____

11/30/22 09:11:56 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)										
Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
09/23/22	8981778		Farrell, Michael	0.30	247.05	47,396.25	WO	HD	TR	_____
09/26/22	8972240		Fates, Edward (Ted)	0.30	206.55	47,602.80	WO	HD	TR	_____
09/26/22	8982420		Farrell, Michael	0.20	164.70	47,767.50	WO	HD	TR	_____
09/27/22	8973257		Fates, Edward (Ted)	0.30	206.55	47,974.05	WO	HD	TR	_____
09/28/22	8975000		Fates, Edward (Ted)	0.70	481.95	48,456.00	WO	HD	TR	_____
09/28/22	8975665		Farrell, Michael	0.30	247.05	48,703.05	WO	HD	TR	_____
09/28/22	8978443		Zaro, David	1.30	1,164.15	49,867.20	WO	HD	TR	_____

11/30/22 09:11:56 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
09/29/22	8976262		Fates, Edward (Ted)	7.40	5,094.90	54,962.10	WO	HD	TR	_____
09/29/22	8978489		Zaro, David	2.90	2,596.95	57,559.05	WO	HD	TR	_____
09/29/22	8979611		Farrell, Michael	2.70	2,223.45	59,782.50	WO	HD	TR	_____
09/30/22	8977304		Fates, Edward (Ted)	2.10	1,445.85	61,228.35	WO	HD	TR	_____

11/30/22 09:11:56 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
09/30/22	8978565		Zaro, David	2.20	1,970.10	63,198.45	WO	HD	TR
09/30/22	8983639		Farrell, Michael	0.40	329.40	63,527.85	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	22.40	895.50	20,059.20
000739	Farrell, Michael	21.60	823.50	17,787.60
001665	Fates, Edward (Ted)	37.30	688.50	25,681.05
		81.30		\$63,527.85
Subtotal Fees				\$63,527.85
Discount				0.00
Total Fees				63,527.85
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 11/30/22

11/30/22 09:11:56 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	67,446.00	67,446.00	0.00	243,067.05	243,067.05	0.00	439,012.35	439,012.35	0.00
Unbilled Adj	0.00	0.00	0.00	2.52	2.52	0.00	7.10	7.10	0.00
Billed	175,619.79	175,619.79	0.00	234,550.52	234,550.52	0.00	371,569.67	371,569.67	0.00
Collected	175,619.79	175,619.79	0.00	234,550.52	234,550.52	0.00	371,569.67	371,569.67	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	67,446.00	67,446.00	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
