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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)

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

Date: September 18, 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 twenty-first interim application for approval and
 4 payment of fees and reimbursement of expenses ("Application"). This Application
 5 covers the period from January 1, 2023, through March 31, 2023 ("Twenty-First
 6 Application Period"), and seeks interim approval of \$59,239.80 in fees and
 7 \$1,955.46 in expenses, and an order authorizing the Receiver to pay, on an interim
 8 basis, 80% of the fees incurred (\$47,391.84) 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 Twenty-First Interim Report ("Twenty-First Report") filed on May 18, 2023 (Dkt. No. 550), which describes in detail the Receiver's activities during the Twenty-First Application Period. This Application seeks interim approval of \$59,239.80 in fees for a total of 77.50 hours worked, and payment on an interim basis of 80% of that amount, or \$47,391.84. The work performed is described task-by-task on Exhibit A and is broken down into the following categories:

| Category | Hours | Amount |
|--------------------------------|-------|-------------|
| Asset Investigation & Recovery | 0.70 | \$895.50 |
| Reporting | 2.60 | \$1,914.30 |
| Claims & Distributions | 2.30 | \$1,583.55 |
| Employment/Fees | 2.2 | \$1,514.70 |
| MPC Litigation | 69.7 | \$53,331.75 |
| Total | 77.50 | \$59,239.80 |

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. Asset Investigation & Recovery

Allen Matkins' limited time in this category focused on advising the Receiver with regard the remaining portfolio of life insurance policies and communications

1 with counsel for the SEC. The reasonable and necessary fees for work in this
2 category total \$895.50.

3 2. Reporting

4 Allen Matkins' time in this category focused on preparing the Receiver's
5 Twentieth Interim Report. Dkt. 450. The report contains detailed descriptions of
6 the Receiver's activities during the fourth quarter of 2022, policy maturities, investor
7 communications, pending litigation, and post-receivership receipts and
8 disbursements. The reports also include the Receiver's recommendations for the
9 continued administration of the receivership estate. The reasonable and necessary
10 fees for work in this category total \$1,914.30.

11 3. Claims & Distributions

12 Allen Matkins assisted the Receiver in providing updates to investors through
13 the receivership website and in response to their inquiries. The reasonable and
14 necessary fees for work in this category total \$1,583.55.

15 4. Employment/Fees

16 Allen Matkins does not charge for the preparation of its own detailed fee
17 applications. The firm assisted the Receiver in preparing his Nineteenth and
18 Twentieth Fee Applications, and in meeting and conferring with counsel for SEC
19 about the fee applications. The reasonable and necessary fees for work in this
20 category total \$1,514.70.

21 5. MP&C Litigation¹

22 The majority of Allen Matkins' work during the Twentieth Application
23 Period focused on the Receiver's claims against Mills Potoczak & Company
24 ("MPC") on behalf of PWCG Trust (the Receiver's Complaint against MPC was
25 previously filed on September 3, 2020) and settlement of those claims. The firm's
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.

1 diligent work during the fourth quarter, in coordination with counsel for the investor
 2 class in the Los Angeles Superior Court ("LASC") cases, directly lead to the LASC
 3 granting preliminary approval of a favorable Settlement Agreement for
 4 \$9.75 million settlement out of \$10 million in available insurance coverage
 5 (\$5 million in primary coverage and \$5 million in excess coverage).

6 The Receiver/class settlement is subject to final approval by the LASC and
 7 this Court. In response to a checklist of comments on the proposed settlement from
 8 the LASC, the Receiver's counsel and class counsel have worked to address the
 9 concerns raised. The proposed settlement agreement was revised, as was the motion
 10 for preliminary approval. The continued hearing on the motion for preliminary
 11 approval of the settlement was held on March 28, 2023. Shortly thereafter,
 12 preliminary approval was granted and a hearing date for final approval was set for
 13 August 30, 2023.

14 The Receiver intends to file a motion for approval of the Settlement
 15 Agreement in this Court final once approval of the Receiver/class settlement has
 16 been obtained from the LASC. The reasonable and necessary fees for work in this
 17 category total \$27,828.00.

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

19 Allen Matkins requests the Court approve reimbursement of \$1,955.46 in out-
 20 of-pocket costs. The itemization of such expenses is summarized below by
 21 category.

| Category | Total |
|--|------------|
| E-Discovery | \$1,835.46 |
| Document Searches (incl. PACER, Lexis, Sec. of State) | \$120.00 |
| TOTAL | \$1,955.46 |

FEES AND COSTS INCURRED AND PAID TO DATE

From inception of the receivership through March 31, 2023, the Receiver incurred fees and costs of \$591,343.05, of which amount \$110,692.26 is subject to holdback pending approval of the Receiver's final fee application at the conclusion of the receivership, \$19,958.38 is awaiting the Court's review and approval, and \$464,362.16 has been approved by the Court and paid to date. During the same time period, Allen Matkins has incurred fees and costs of \$1,675,148.80, of which amount \$327,057.39 is subject to holdback pending approval of Allen Matkins' final fee application at the conclusion of the receivership, \$61,195.26 is awaiting the Court's review and approval, and \$1,298,744.11 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 0.80 hours of work (\$550.80 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 \$59,239.80;
- 12 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
 13 \$47,391.84, from the assets of the Receivership Entities;
- 14 3. Approving Allen Matkins' costs in the amount of \$1,955.46 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: August 15, 2023

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

19 By: /s/ Edward Fates

20 EDWARD G. FATES
 21 Attorneys for Receiver
 22 THOMAS HEBRANK
 23
 24
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EXHIBIT A

06/20/23 14:47:38 PROFORMA STATEMENT FOR MATTER 377432.00003 (Thomas C. Hebrank, as Receiver for PWCG) (Asset Investigation & Recovery)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 377432.00003 Client Name: Thomas C. Hebrank, as Receiver for PWCG
Date of Last Billing: 02/17/23 Matter Name: Asset Investigation & Recovery
Proforma Number: 1221467
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 | |
|------------|---------|---|-------------|-------|--------|--------|--------|--------|----|
| 02/27/23 | 9132281 | Call with SEC counsel concerning the status of PWCG matter, settlement, pending matter and motion for summary judgment. | Zaro, David | 0.30 | 268.65 | 268.65 | WO | HD | TR |
| 03/01/23 | 9139165 | Analysis of status of operations/the policies and further review, evaluation of portfolio. | Zaro, David | 0.40 | 358.20 | 626.85 | WO | HD | TR |

Disbursements for Matter 377432.00003 (Asset Investigation & Recovery)

| Trans Date | Index | Type | Quantity | Amt | Circle | Action | |
|------------|---------|--|----------|--------|--------|--------|----|
| 01/01/23 | 2800196 | EDISC – CS Disco, Inc. - Monthly Hosting for January 2023 | 0.00 | 150.00 | WO | HD | TR |
| 01/01/23 | 2800226 | EDISC – CS Disco, Inc. - Monthly Hosting for January 2023 | 0.00 | 150.00 | WO | HD | TR |
| 01/01/23 | 2800229 | EDISC – CS Disco, Inc. - Monthly Hosting for January 2023 | 0.00 | 542.73 | WO | HD | TR |
| 02/01/23 | 2803907 | EDISC – CS Disco, Inc. - Monthly Hosting for February 2023 | 0.00 | 150.00 | WO | HD | TR |
| 02/01/23 | 2803936 | EDISC – CS Disco, Inc. - Monthly Hosting for February 2023 | 0.00 | 150.00 | WO | HD | TR |
| 02/01/23 | 2803939 | EDISC – CS Disco, Inc. - Monthly Hosting for February 2023 | 0.00 | 542.73 | WO | HD | TR |

06/20/23 14:47:38 PROFORMA STATEMENT FOR MATTER 377432.00003 (Thomas C. Hebrank, as Receiver for PWCG) (Asset Investigation & Recovery)

Disbursements for Matter 377432.00003 (Asset Investigation & Recovery)

| Trans Date | Index | Type | Quantity | Amt | | | | |
|------------|---------|---|----------|--------|----|----|----|-------|
| 02/09/23 | 2802455 | DCSRCH – Case Anywhere LLC - System Access Fee (11/1/22 - 1/31/23) | 0.00 | 120.00 | WO | HD | TR | _____ |
| 03/01/23 | 2809678 | EDISC – CS Disco, Inc. - Monthly Hosting for March 2023 | 0.00 | 150.00 | 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 | | | | 1,955.46 |

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

Account Summary – As Of 06/20/23

| | Fiscal YTD | | | Calendar YTD | | | LTD | | |
|--------------|------------|----------|----------|--------------|----------|----------|------------|------------|---------------|
| | Total | Fees | Disb. | Total | Fees | Disb. | Total | Fees | Disbursements |
| Worked | 5,648.40 | 4,298.40 | 1,350.00 | 5,627.01 | 3,671.55 | 1,955.46 | 142,526.60 | 139,634.64 | 2,891.96 |
| Unbilled Adj | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.09 | 0.09 | 0.00 |
| Billed | 626.85 | 626.85 | 0.00 | 626.85 | 626.85 | 0.00 | 135,648.00 | 135,648.00 | 936.50 |
| Collected | 626.85 | 626.85 | 0.00 | 626.85 | 626.85 | 0.00 | 136,584.50 | 135,648.00 | 936.50 |
| AR Write Off | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |

06/20/23 14:47:38 PROFORMA STATEMENT FOR MATTER 377432.00003 (Thomas C. Hebrank, as Receiver for PWCG) (Asset Investigation & Recovery)

| | Total | Fees | Costs |
|---------------------|-----------------|-----------------|-----------------|
| WIP | 5,927.01 | 3,671.55 | 2,255.46 |
| 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

06/20/23 14:47:40 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: 05/25/23 Matter Name: Reporting
 Proforma Number: 1221467
 Client/Matter Joint Group # 377432-1 Client Matter Number:

Fees for Matter 377432.00004.(Reporting)

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle | Action | |
|------------|---------|---|---------------------|-------|--------|----------|--------|--------|----|
| 01/31/23 | 9101552 | Work on quarterly interim report | Fates, Edward (Ted) | 0.40 | 275.40 | 275.40 | WO | HD | TR |
| 01/31/23 | 9106785 | Several conferences, address the status, prospective policy payment, Receiver accounting and address Receiver report. | Zaro, David | 0.60 | 537.30 | 812.70 | WO | HD | TR |
| 02/02/23 | 9108418 | Work on revisions to 20th interim report (.7) discuss same with Receiver (.4) | Fates, Edward (Ted) | 1.10 | 757.35 | 1,570.05 | WO | HD | TR |
| 02/13/23 | 9115998 | Meet and confer communications with SEC counsel regarding 20th interim report | Fates, Edward (Ted) | 0.10 | 68.85 | 1,638.90 | WO | HD | TR |
| 02/21/23 | 9132797 | Update and finalize Receiver's 20th interim report | Fates, Edward (Ted) | 0.40 | 275.40 | 1,914.30 | WO | HD | TR |

Proforma Summary

| Timekeeper Number | Timekeeper | Hours | Rate | Amounts |
|-------------------|---------------------|-------|--------|------------|
| 000313 | Zaro, David | 0.60 | 895.50 | 537.30 |
| 001665 | Fates, Edward (Ted) | 2.00 | 688.50 | 1,377.00 |
| | | 2.60 | | \$1,914.30 |

06/20/23 14:47:40 PROFORMA STATEMENT FOR MATTER 377432.00004 (Thomas C. Hebrank, as Receiver for PWCG) (Reporting)

Proforma Summary**Timekeeper**

| Number | Timekeeper | Hours | Rate | Amounts |
|---------------------|-------------------|--------------|-------------|----------------|
| Subtotal Fees | | | | \$1,914.30 |
| Discount | | | | 0.00 |
| Total Fees | | | | 1,914.30 |
| Total Disbursements | | | | 0.00 |

Attorney Billing Instructions

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

Billing Instructions

| |
|---|
| expires 6/30/2024: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10 |
|---|

Account Summary – As Of 06/20/23

| | Fiscal YTD | | | Calendar YTD | | | LTD | | |
|---------------------|------------------|------------------|-------------|--------------|-----------|-------|-----------|-----------|---------------|
| | Total | Fees | Disb. | Total | Fees | Disb. | Total | Fees | Disbursements |
| Worked | 25,811.10 | 25,811.10 | 0.00 | 16,837.20 | 16,837.20 | 0.00 | 84,562.05 | 78,763.95 | 5,798.10 |
| Unbilled Adj | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| Billed | 15,970.95 | 15,970.95 | 0.00 | 8,973.90 | 8,973.90 | 0.00 | 61,926.75 | 61,926.75 | 5,798.10 |
| Collected | 15,970.95 | 15,970.95 | 0.00 | 8,973.90 | 8,973.90 | 0.00 | 67,724.85 | 61,926.75 | 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 | 16,837.20 | 16,837.20 | 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

06/20/23 14:47:41 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward Matter #: 377432.00006 Client Name: Thomas C. Hebrank, as Receiver for PWCG
(Ted)
Date of Last Billing: 05/25/23 Matter Name: Claims & Distributions
Proforma Number: 1221467
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 | |
|------------|---------|--|---------------------|-------|--------|----------|--------|--------|----|
| 01/12/23 | 9083428 | Communications with Receiver re: updated information for website and investor notice | Fates, Edward (Ted) | 0.30 | 206.55 | 206.55 | WO | HD | TR |
| 02/06/23 | 9109892 | Respond to investor inquiries regarding claims and distributions | Fates, Edward (Ted) | 0.30 | 206.55 | 413.10 | WO | HD | TR |
| 02/09/23 | 9118590 | Respond directly to investor correspondence re: distributions (.4) discuss same with Receiver (.3) | Fates, Edward (Ted) | 0.70 | 481.95 | 895.05 | WO | HD | TR |
| 02/14/23 | 9135187 | Assist Receiver with preparing status update for investors for website | Fates, Edward (Ted) | 0.40 | 275.40 | 1,170.45 | WO | HD | TR |
| 03/14/23 | 9149172 | Advise Receiver on information and updates for receivership website | Fates, Edward (Ted) | 0.30 | 206.55 | 1,377.00 | WO | HD | TR |
| 03/28/23 | 9164321 | Analyze and advise Receiver on response to investor communications | Fates, Edward (Ted) | 0.30 | 206.55 | 1,583.55 | WO | HD | TR |

Proforma Summary

| Timekeeper Number | Timekeeper | Hours | Rate | Amounts |
|-------------------|------------|-------|------|---------|
|-------------------|------------|-------|------|---------|

06/20/23 14:47:41 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

Proforma Summary**Timekeeper**

| Number | Timekeeper | Hours | Rate | Amounts |
|---------------------|---------------------|--------------|-------------|----------------|
| 001665 | Fates, Edward (Ted) | 2.30 | 688.50 | 1,583.55 |
| | | 2.30 | | \$1,583.55 |
| Subtotal Fees | | | | \$1,583.55 |
| Discount | | | | 0.00 |
| Total Fees | | | | 1,583.55 |
| Total Disbursements | | | | 0.00 |

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

Account Summary – As Of 06/20/23

| | Fiscal YTD | | | Calendar YTD | | | LTD | | |
|---------------------|-----------------|-----------------|-------------|--------------|----------|-------|------------|------------|---------------|
| | Total | Fees | Disb. | Total | Fees | Disb. | Total | Fees | Disbursements |
| Worked | 8,041.95 | 8,041.95 | 0.00 | 3,773.25 | 3,773.25 | 0.00 | 154,802.25 | 154,802.25 | 0.00 |
| Unbilled Adj | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 6.66 | 6.66 | 0.00 |
| Billed | 4,526.10 | 4,526.10 | 0.00 | 4,268.70 | 4,268.70 | 0.00 | 151,035.66 | 151,035.66 | 0.00 |
| Collected | 4,526.10 | 4,526.10 | 0.00 | 4,268.70 | 4,268.70 | 0.00 | 151,035.66 | 151,035.66 | 0.00 |
| AR Write Off | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| WIP | 3,773.25 | 3,773.25 | 0.00 | | | | | | |
| Balance | | | | | | | | | |
| AR Balance | 0.00 | 0.00 | 0.00 | | | | | | |
| Unalloc | 0.00 | | | | | | | | |
| Payment | | | | | | | | | |
| Client Trust | 0.00 | | | | | | | | |
| Balance | | | | | | | | | |

06/20/23 14:47:42 PROFORMA STATEMENT FOR MATTER 377432.00009 (Thomas C. Hebrank, as Receiver for PWCG) (Employment/Fees)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 377432.00009 Client Name: Thomas C. Hebrank, as Receiver for PWCG
Date of Last Billing: 02/17/23 Matter Name: Employment/Fees
Proforma Number: 1221467
Client/Matter Joint Group # 377432-1 Client Matter Number:

Fees for Matter 377432.00009.(Employment/Fees)

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle | Action | |
|------------|---------|--|---------------------|-------|--------|----------|--------|--------|----|
| 01/06/23 | 9078602 | Revisions to Receiver's 19th interim fee application | Fates, Edward (Ted) | 0.40 | 275.40 | 275.40 | WO | HD | TR |
| 01/09/23 | 9089001 | Meet and confer communications with SEC counsel regarding 19th interim fee applications | Fates, Edward (Ted) | 0.30 | 206.55 | 481.95 | WO | HD | TR |
| 01/19/23 | 9089041 | Finalize Receiver's 19th fee application, proposed order and notice of hearing | Fates, Edward (Ted) | 0.40 | 275.40 | 757.35 | WO | HD | TR |
| 03/14/23 | 9160039 | Work on revisions to Receiver's 20th interim fee application | Fates, Edward (Ted) | 0.50 | 344.25 | 1,101.60 | WO | HD | TR |
| 03/15/23 | 9150759 | Meet and confer communications with SEC counsel regarding interim fee applications | Fates, Edward (Ted) | 0.20 | 137.70 | 1,239.30 | WO | HD | TR |
| 03/21/23 | 9156522 | Meet and confer call with SEC counsel (.1) finalize Receiver's interim fee application, notice and proposed order (.3) | Fates, Edward (Ted) | 0.40 | 275.40 | 1,514.70 | WO | HD | TR |

Proforma Summary

06/20/23 14:47:42 PROFORMA STATEMENT FOR MATTER 377432.00009 (Thomas C. Hebrank, as Receiver for PWCG) (Employment/Fees)

Timekeeper

| Number | Timekeeper | Hours | Rate | Amounts |
|---------------------|---------------------|--------------|-------------|----------------|
| 001665 | Fates, Edward (Ted) | 2.20 | 688.50 | 1,514.70 |
| | | 2.20 | | \$1,514.70 |
| Subtotal Fees | | | | \$1,514.70 |
| Discount | | | | 0.00 |
| Total Fees | | | | 1,514.70 |
| Total Disbursements | | | | 0.00 |

Attorney Billing Instructions

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

Billing Instructions

| |
|---|
| expires 6/30/2024: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10 |
|---|

Account Summary – As Of 06/20/23

| | Fiscal YTD | | | Calendar YTD | | | LTD | | |
|---------------------|-----------------|-----------------|--------------|--------------|----------|-------|-----------|-----------|---------------|
| | Total | Fees | Disb. | Total | Fees | Disb. | Total | Fees | Disbursements |
| Worked | 2,134.35 | 2,134.35 | 0.00 | 1,514.70 | 1,514.70 | 0.00 | 11,812.50 | 11,812.50 | 0.00 |
| Unbilled Adj | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 7.11 | 7.11 | 0.00 |
| Billed | 2,647.35 | 2,647.35 | 0.00 | 619.65 | 619.65 | 0.00 | 10,304.91 | 10,304.91 | 0.00 |
| Collected | 2,647.35 | 2,647.35 | 0.00 | 619.65 | 619.65 | 0.00 | 10,304.91 | 10,304.91 | 0.00 |
| AR Write Off | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| WIP | 1,514.70 | 1,514.70 | Costs | | | | | | |
| Balance | | | 0.00 | | | | | | |
| AR Balance | 0.00 | 0.00 | 0.00 | | | | | | |
| Unalloc | 0.00 | | | | | | | | |
| Payment | | | | | | | | | |
| Client Trust | 0.00 | | | | | | | | |
| Balance | | | | | | | | | |

Billing Address

06/20/23 14:47:44 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: 05/25/23 | | Matter Name: MP&C Litigation |
| Proforma Number: 1221467 | | |
| Client/Matter Joint Group # 377432-1 | | Client Matter Number: |

Fees for Matter 377432.00011.(MP&C Litigation)

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle | Action | |
|---------------|---------|---------------------------------|---------------------|-------|--------|----------|--------|--------|----|
| 01/03/23 | 9085603 | | Farrell, Michael | 1.20 | 988.20 | 988.20 | WO | HD | TR |
| 01/03/23 | 9088367 | | Fates, Edward (Ted) | 0.90 | 619.65 | 1,607.85 | WO | HD | TR |
| 01/04/23 | 9077207 | | Fates, Edward (Ted) | 0.40 | 275.40 | 1,883.25 | WO | HD | TR |
| 01/04/23 | 9092347 | | Farrell, Michael | 0.50 | 411.75 | 2,295.00 | WO | HD | TR |
| 01/05/23 | 9080096 | | Zaro, David | 1.10 | 985.05 | 3,280.05 | WO | HD | TR |

06/20/23 14:47:44 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle Action | | | |
|------------|---------|---------------------------------|---------------------|-------|----------|-----------|---------------|----|----|-------|
| 01/05/23 | 9088389 | | Fates, Edward (Ted) | 0.70 | 481.95 | 3,762.00 | WO | HD | TR | _____ |
| 01/06/23 | 9088402 | | Fates, Edward (Ted) | 2.70 | 1,858.95 | 5,620.95 | WO | HD | TR | _____ |
| 01/06/23 | 9093944 | | Farrell, Michael | 3.40 | 2,799.90 | 8,420.85 | WO | HD | TR | _____ |
| 01/09/23 | 9102932 | | Farrell, Michael | 0.50 | 411.75 | 8,832.60 | WO | HD | TR | _____ |
| 01/10/23 | 9103047 | | Farrell, Michael | 2.30 | 1,894.05 | 10,726.65 | WO | HD | TR | _____ |

06/20/23 14:47:44 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle Action | | | |
|------------|---------|---------------------------------|---------------------|-------|--------|-----------|---------------|----|----|-------|
| 01/11/23 | 9088420 | | Fates, Edward (Ted) | 0.80 | 550.80 | 11,277.45 | WO | HD | TR | _____ |
| 01/11/23 | 9103092 | | Farrell, Michael | 1.20 | 988.20 | 12,265.65 | WO | HD | TR | _____ |
| 01/18/23 | 9088678 | | Zaro, David | 0.40 | 358.20 | 12,623.85 | WO | HD | TR | _____ |
| 01/18/23 | 9103974 | | Farrell, Michael | 0.30 | 247.05 | 12,870.90 | WO | HD | TR | _____ |
| 01/19/23 | 9104059 | | Farrell, Michael | 0.30 | 247.05 | 13,117.95 | WO | HD | TR | _____ |
| 01/20/23 | 9090646 | | Farrell, Michael | 0.20 | 164.70 | 13,282.65 | WO | HD | TR | _____ |
| 01/23/23 | 9093029 | | Zaro, David | 0.20 | 179.10 | 13,461.75 | WO | HD | TR | _____ |

06/20/23 14:47:44 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle Action | | | |
|------------|---------|---------------------------------|---------------------|-------|----------|-----------|---------------|----|----|-------|
| 01/25/23 | 9104964 | | Farrell, Michael | 0.20 | 164.70 | 13,626.45 | WO | HD | TR | _____ |
| 01/26/23 | 9099440 | | Zaro, David | 0.60 | 537.30 | 14,163.75 | WO | HD | TR | _____ |
| 01/26/23 | 9104388 | | Fates, Edward (Ted) | 0.80 | 550.80 | 14,714.55 | WO | HD | TR | _____ |
| 01/26/23 | 9105246 | | Farrell, Michael | 0.90 | 741.15 | 15,455.70 | WO | HD | TR | _____ |
| 01/27/23 | 9097282 | | Fates, Edward (Ted) | 0.50 | 344.25 | 15,799.95 | WO | HD | TR | _____ |
| 01/27/23 | 9100403 | | Farrell, Michael | 2.10 | 1,729.35 | 17,529.30 | WO | HD | TR | _____ |
| 01/31/23 | 9102375 | | Farrell, Michael | 0.30 | 247.05 | 17,776.35 | WO | HD | TR | _____ |

06/20/23 14:47:44 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle Action | | | |
|------------|---------|---------------------------------|---------------------|-------|----------|-----------|---------------|----|----|-------|
| 01/31/23 | 9106797 | | Zaro, David | 0.40 | 358.20 | 18,134.55 | WO | HD | TR | _____ |
| 02/01/23 | 9107350 | | Fates, Edward (Ted) | 2.70 | 1,858.95 | 19,993.50 | WO | HD | TR | _____ |
| 02/01/23 | 9133951 | | Farrell, Michael | 1.30 | 1,070.55 | 21,064.05 | WO | HD | TR | _____ |
| 02/02/23 | 9134424 | | Farrell, Michael | 0.50 | 411.75 | 21,475.80 | WO | HD | TR | _____ |
| 02/03/23 | 9116088 | | Fates, Edward (Ted) | 0.90 | 619.65 | 22,095.45 | WO | HD | TR | _____ |
| 02/03/23 | 9134575 | | Farrell, Michael | 1.50 | 1,235.25 | 23,330.70 | WO | HD | TR | _____ |
| 02/06/23 | 9134634 | | Farrell, Michael | 0.30 | 247.05 | 23,577.75 | WO | HD | TR | _____ |
| 02/07/23 | 9111307 | | Fates, Edward (Ted) | 0.70 | 481.95 | 24,059.70 | WO | HD | TR | _____ |

06/20/23 14:47:44 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle | Action | |
|------------|---------|---------------------------------|---------------------|-------|----------|-----------|--------|--------|----------|
| 02/07/23 | 9134847 | | Farrell, Michael | 1.70 | 1,399.95 | 25,459.65 | WO | HD | TR _____ |
| 02/08/23 | 9111787 | | Fates, Edward (Ted) | 1.10 | 757.35 | 26,217.00 | WO | HD | TR _____ |
| 02/08/23 | 9113893 | | Farrell, Michael | 0.70 | 576.45 | 26,793.45 | WO | HD | TR _____ |
| 02/09/23 | 9113280 | | Fates, Edward (Ted) | 0.40 | 275.40 | 27,068.85 | WO | HD | TR _____ |
| 02/09/23 | 9135141 | | Farrell, Michael | 0.30 | 247.05 | 27,315.90 | WO | HD | TR _____ |
| 02/13/23 | 9119773 | | Zaro, David | 0.70 | 626.85 | 27,942.75 | WO | HD | TR _____ |

06/20/23 14:47:44 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle Action | | | |
|------------|---------|---------------------------------|---------------------|-------|--------|-----------|---------------|----|----|-------|
| 02/13/23 | 9135193 | | Fates, Edward (Ted) | 0.70 | 481.95 | 28,424.70 | WO | HD | TR | _____ |
| 02/13/23 | 9136169 | | Farrell, Michael | 0.90 | 741.15 | 29,165.85 | WO | HD | TR | _____ |
| 02/14/23 | 9117330 | | Fates, Edward (Ted) | 0.70 | 481.95 | 29,647.80 | WO | HD | TR | _____ |
| 02/14/23 | 9136427 | | Farrell, Michael | 0.40 | 329.40 | 29,977.20 | WO | HD | TR | _____ |
| 02/22/23 | 9125017 | | Fates, Edward (Ted) | 0.30 | 206.55 | 30,183.75 | WO | HD | TR | _____ |
| 02/22/23 | 9125396 | | Farrell, Michael | 0.40 | 329.40 | 30,513.15 | WO | HD | TR | _____ |
| 02/22/23 | 9130128 | | Zaro, David | 0.40 | 358.20 | 30,871.35 | WO | HD | TR | _____ |
| 02/23/23 | 9127136 | | Fates, Edward (Ted) | 0.30 | 206.55 | 31,077.90 | WO | HD | TR | _____ |

06/20/23 14:47:44 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Fees for Matter 377432.00011.(MP&C Litigation)

| Trans Date | Index | Description of Service Rendered | Timekeeper | Hours | Fees | Sum | Circle | Action | | |
|------------|---------|---------------------------------|---------------------|-------|----------|-----------|--------|--------|----|-------|
| 02/23/23 | 9132404 | | Farrell, Michael | 0.40 | 329.40 | 31,407.30 | WO | HD | TR | _____ |
| 02/28/23 | 9137442 | | Fates, Edward (Ted) | 0.60 | 413.10 | 31,820.40 | WO | HD | TR | _____ |
| 02/28/23 | 9138053 | | Farrell, Michael | 0.20 | 164.70 | 31,985.10 | WO | HD | TR | _____ |
| 03/01/23 | 9139163 | | Zaro, David | 0.20 | 179.10 | 32,164.20 | WO | HD | TR | _____ |
| 03/01/23 | 9149351 | | Fates, Edward (Ted) | 1.90 | 1,308.15 | 33,472.35 | WO | HD | TR | _____ |
| 03/01/23 | 9165305 | | Farrell, Michael | 1.10 | 905.85 | 34,378.20 | WO | HD | TR | _____ |
| 03/02/23 | 9154999 | | Fates, Edward (Ted) | 3.20 | 2,203.20 | 36,581.40 | WO | HD | TR | _____ |

06/20/23 14:47:44 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 | | | |
|---------------|---------|---------------------------------|---------------------|-------|----------|-----------|---------------|----|----|-------|
| 03/02/23 | 9166533 | | Farrell, Michael | 1.70 | 1,399.95 | 37,981.35 | WO | HD | TR | _____ |
| 03/03/23 | 9155000 | | Fates, Edward (Ted) | 2.60 | 1,790.10 | 39,771.45 | WO | HD | TR | _____ |
| 03/03/23 | 9168058 | | Farrell, Michael | 1.10 | 905.85 | 40,677.30 | WO | HD | TR | _____ |
| 03/04/23 | 9168089 | | Farrell, Michael | 0.40 | 329.40 | 41,006.70 | WO | HD | TR | _____ |

06/20/23 14:47:44 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 | | | |
|------------|---------|---------------------------------|---------------------|-------|----------|-----------|---------------|----|----|-------|
| 03/06/23 | 9141324 | | Fates, Edward (Ted) | 1.70 | 1,170.45 | 42,177.15 | WO | HD | TR | _____ |
| 03/06/23 | 9168102 | | Farrell, Michael | 0.70 | 576.45 | 42,753.60 | WO | HD | TR | _____ |
| 03/15/23 | 9150224 | | Fates, Edward (Ted) | 0.70 | 481.95 | 43,235.55 | WO | HD | TR | _____ |
| 03/15/23 | 9170135 | | Farrell, Michael | 0.20 | 164.70 | 43,400.25 | WO | HD | TR | _____ |
| 03/20/23 | 9164631 | | Fates, Edward (Ted) | 0.90 | 619.65 | 44,019.90 | WO | HD | TR | _____ |
| 03/20/23 | 9170180 | | Farrell, Michael | 0.40 | 329.40 | 44,349.30 | WO | HD | TR | _____ |

06/20/23 14:47:44 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 | | |
|------------|---------|---------------------------------|---------------------|-------|----------|-----------|--------|--------|----|-------|
| 03/21/23 | 9164636 | | Fates, Edward (Ted) | 0.50 | 344.25 | 44,693.55 | WO | HD | TR | _____ |
| 03/21/23 | 9170187 | | Farrell, Michael | 0.30 | 247.05 | 44,940.60 | WO | HD | TR | _____ |
| 03/22/23 | 9159001 | | Zaro, David | 0.60 | 537.30 | 45,477.90 | WO | HD | TR | _____ |
| 03/22/23 | 9165304 | | Fates, Edward (Ted) | 0.70 | 481.95 | 45,959.85 | WO | HD | TR | _____ |
| 03/22/23 | 9170624 | | Farrell, Michael | 0.30 | 247.05 | 46,206.90 | WO | HD | TR | _____ |
| 03/24/23 | 9160054 | | Fates, Edward (Ted) | 0.30 | 206.55 | 46,413.45 | WO | HD | TR | _____ |
| 03/27/23 | 9173690 | | Zaro, David | 0.40 | 358.20 | 46,771.65 | WO | HD | TR | _____ |
| 03/28/23 | 9163791 | | Fates, Edward (Ted) | 4.10 | 2,822.85 | 49,594.50 | WO | HD | TR | _____ |

06/20/23 14:47:44 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 | |
|------------|---------|---------------------------------|---------------------|-------|----------|-----------|--------|--------|----------|
| 03/28/23 | 9164928 | | Farrell, Michael | 3.10 | 2,552.85 | 52,147.35 | WO | HD | TR _____ |
| 03/28/23 | 9173693 | | Zaro, David | 0.40 | 358.20 | 52,505.55 | WO | HD | TR _____ |
| 03/29/23 | 9172304 | | Fates, Edward (Ted) | 1.20 | 826.20 | 53,331.75 | WO | HD | TR _____ |

Proforma Summary

| Timekeeper Number | Timekeeper | Hours | Rate | Amounts |
|---------------------|---------------------|--------------|--------|--------------------|
| 000313 | Zaro, David | 5.40 | 895.50 | 4,835.70 |
| 000739 | Farrell, Michael | 31.30 | 823.50 | 25,775.55 |
| 001665 | Fates, Edward (Ted) | 33.00 | 688.50 | 22,720.50 |
| | | <u>69.70</u> | | <u>\$53,331.75</u> |
| Subtotal Fees | | | | \$53,331.75 |
| Discount | | | | 0.00 |
| Total Fees | | | | 53,331.75 |
| Total Disbursements | | | | 0.00 |

06/20/23 14:47:44 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

Account Summary – As Of 06/20/23

| | Fiscal YTD | | | Calendar YTD | | | LTD | | |
|---------------------|------------------|------------------|-------------|--------------|-----------|-------|------------|------------|---------------|
| | Total | Fees | Disb. | Total | Fees | Disb. | Total | Fees | Disbursements |
| Worked | 137,385.45 | 137,385.45 | 0.00 | 68,397.75 | 68,397.75 | 0.00 | 508,951.80 | 508,951.80 | 0.00 |
| Unbilled Adj | 2.88 | 2.88 | 0.00 | 0.00 | 0.00 | 0.00 | 9.98 | 9.98 | 0.00 |
| Billed | 244,605.33 | 244,605.33 | 0.00 | 68,985.54 | 68,985.54 | 0.00 | 440,555.21 | 440,555.21 | 0.00 |
| Collected | 244,605.33 | 244,605.33 | 0.00 | 68,985.54 | 68,985.54 | 0.00 | 440,555.21 | 440,555.21 | 0.00 |
| AR Write Off | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 | 0.00 |
| WIP | 68,397.75 | 68,397.75 | 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