

1 ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
2 DAVID R. ZARO (BAR NO. 124334)  
865 South Figueroa Street, Suite 2800  
3 Los Angeles, California 90017-2543  
Phone: (213) 622-5555  
4 Fax: (213) 620-8816  
E-Mail: dzaro@allenmatkins.com

5 ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
6 EDWARD G. FATES (BAR NO. 227809)  
One America Plaza  
7 600 West Broadway, 27th Floor  
8 San Diego, California 92101-0903  
Phone: (619) 233-1155  
9 Fax: (619) 233-1158  
E-Mail: tfates@allenmatkins.com

10 Attorneys for Receiver  
11 THOMAS HEBRANK

12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA

14  
15 SECURITIES AND EXCHANGE  
COMMISSION,

16 Plaintiff,

17 v.

18 PACIFIC WEST CAPITAL GROUP,  
19 INC.; ANDREW B CALHOUN IV;  
PWCG TRUST; BRENDA CHRISTINE  
20 BARRY; BAK WEST, INC.; ANDREW B  
CALHOUN JR.; ERIC CHRISTOPHER  
21 CANNON; CENTURY POINT, LLC;  
MICHAEL WAYNE DOTTA; and  
22 CALEB AUSTIN MOODY (dba SKY  
STONE),

23 Defendants.  
24

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

**TWENTY-SIXTH 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 21, 2024  
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-sixth interim application for approval and  
4 payment of fees and reimbursement of expenses (“Application”). This Application  
5 covers the period from April 1, 2024, through June 30, 2024 (“Twenty-Sixth  
6 Application Period”), and seeks interim approval of \$8,554.50 in fees and \$450.00  
7 in expenses, and an order authorizing the Receiver to pay, on an interim basis, 80%  
8 of the fees incurred (\$6,843.60) 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  
27  
28

1 In an abundance of caution, the Receiver sought specific Court approval of  
2 Allen Matkins’ employment, which was approved on April 10, 2018. Dkt.  
3 Nos. 150, 152. The Court also approved the Receiver’s proposal to file reports and  
4 fee applications on a quarterly basis. *Id.*

5 **II. FEE APPLICATION**

6 This fee application should be read in conjunction with the Receiver’s  
7 Twenty-Sixth Interim Report (“Twenty-Sixth Report”) filed on August 22, 2024  
8 (Dkt. No. 643), which describes in detail the Receiver’s activities during the  
9 Twenty-Sixth Application Period. This Application seeks interim approval of  
10 \$8,554.50 in fees for a total of 11.40 hours worked, and payment on an interim basis  
11 of 80% of that amount, or \$6,843.60. The work performed is described task-by-task  
12 on Exhibit A and is broken down into the following categories:

Category	Hours	Amount
General	1.20	\$981.00
Reporting	2.80	\$2,079.00
Claims & Distributions	6.50	\$4,826.25
Employment/Fees	0.40	\$297.00
MPC Litigation	0.50	\$371.25
Total	11.40	\$8,554.50

13  
14  
15  
16  
17  
18  
19  
20  
21 Allen Matkins has worked diligently and efficiently to assist the Receiver to  
22 address legal issues facing the receivership estate. The firm’s work has allowed the  
23 Receiver to preserve and protect the substantial value of receivership estate assets.  
24 Allen Matkins’ work has assisted the Receiver in carrying out his Court-ordered  
25 duties and the firm should be compensated on an interim basis.

26  
27  
28

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

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

3 1. General

4 Work in this category focused on ensuring that PWCG Trust complies with  
5 the filing requirements of the Corporate Transparency Act. The reasonable and  
6 necessary fees for work in this category total \$981.00.

7 2. Reporting

8 Allen Matkins' time in this category focused on preparing the Receiver's  
9 Twenty-Fifth Report. Dkt. 634. The report contains detailed descriptions of the  
10 Receiver's activities during the first quarter of 2024, policy maturities, investor  
11 communications, pending litigation, and post-receivership receipts and  
12 disbursements. The reports also include 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 \$2,079.00.

15 3. Claims & Distributions

16 Allen Matkins assisted the Receiver in resolving issues relating to investor  
17 claims and providing updates to investors through the receivership website and in  
18 response to their inquiries. The reasonable and necessary fees for work in this  
19 category total \$4,826.25.

20 4. Employment/Fees

21 Allen Matkins does not charge for time spent preparing its own fee  
22 applications. The firm assisted the Receiver in preparing his Twenty-Fifth Interim  
23 Fee Application, which was filed on May 17, 2024. Dkt. 635. The reasonable and  
24 necessary fees for work in this category total \$297.00.

25  
26  
27  
28



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  
28

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

6 Allen Matkins has submitted a detailed fee application which describes the  
7 nature of the services rendered, and the identity and billing rate of each individual  
8 performing each task. *See* Exhibit A. Allen Matkins has endeavored to staff matters  
9 as efficiently as possible, while remaining cognizant of the complexity of issues.  
10 The request for fees is based on Allen Matkins' customary billing rates charged for  
11 comparable services provided in other matters, less a 10% discount. Moreover,  
12 Allen Matkins wrote off and did not charge for 1.00 hours of work (\$742.50 in fees).

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

## 23 VI. CONCLUSION

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

- 25 1. Approving Allen Matkins' fees, on an interim basis, of \$8,554.50;
- 26 2. Authorizing and directing the Receiver to pay 80% of approved fees, or  
27 \$6,843.60, from the assets of the Receivership Entities;

28

1           3.     Approving Allen Matkins’ costs in the amount of \$450.00 and  
2 authorizing and directing the Receiver to reimburse such costs in full; and

3           4.     For such other and further relief as the Court deems appropriate.  
4

5 Dated: September 17, 2024

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

By:           /s/ Edward Fates          

EDWARD G. FATES  
Attorneys for Receiver  
THOMAS HEBRANK

6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



# **EXHIBIT A**

07/24/24 16:55:40 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: 06/04/24      Matter Name: General Receivership  
 Proforma Number: 1284966  
 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		
05/02/24	9610484	Evaluate the status of portfolio, cash flow and projections, follow-up with counsel.	Zaro, David	0.40	387.00	387.00	WO	HD	TR	_____
06/19/24	9665882	Analyze requirements of Corporate Transparency Act and application of same to PWCG Trust (.5) discuss same with Receiver (.3)	Fates, Edward (Ted)	0.80	594.00	981.00	WO	HD	TR	_____

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

Trans Date	Index	Type	Quantity	Amt	Circle	Action		
04/01/24	2874815	EDISC – CS Disco, Inc. - Monthly Hosting for April 2024	0.00	150.00	WO	HD	TR	_____
05/01/24	2878924	EDISC – CS Disco, Inc. - Monthly Hosting for May 2024	0.00	150.00	WO	HD	TR	_____
06/01/24	2884282	EDISC – CS Disco, Inc. - Monthly Hosting for June 2024	0.00	150.00	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.40	967.50	387.00
001665	Fates, Edward (Ted)	0.80	742.50	594.00

07/24/24 16:55:40 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
		1.20		\$981.00
	Subtotal Fees			\$981.00
	Discount			0.00
	Total Fees			981.00
	Total Disbursements			450.00

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2025: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

**Account Summary – As Of 07/24/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	1,431.00	981.00	450.00	199,152.74	166,959.45	32,193.29
Unbilled Adj	0.00	0.00	0.00	1.70	0.00	1.70	2,128.29	15.03	2,113.26
Billed	0.00	0.00	0.00	0.00	0.00	0.00	165,972.96	165,972.96	31,743.29
Collected	0.00	0.00	0.00	0.00	0.00	0.00	197,716.25	165,972.96	31,743.29
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>1,432.90</b>	<b>981.00</b>	<b>451.90</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**

07/24/24 16:55:40 PROFORMA STATEMENT FOR MATTER 377432.00002 (Thomas C. Hebrank, as Receiver for PWCG) (General Receivership)

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

---

07/24/24 16:55:44 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: 06/04/24      Matter Name: Reporting  
 Proforma Number: 1284966  
 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		
04/24/24	9597394	Work on Receiver's 25th interim report	Fates, Edward (Ted)	1.10	816.75	816.75	WO	HD	TR	_____
04/25/24	9599359	Work on revisions to Receiver's 25th interim report (.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.60	445.50	1,262.25	WO	HD	TR	_____
04/30/24	9604031	Meet and confer communications with SEC counsel regarding 25th interim report	Fates, Edward (Ted)	0.20	148.50	1,410.75	WO	HD	TR	_____
05/17/24	9625394	Meet and confer communications with SEC counsel regarding 25th interim report and related accounting issues (.6) discuss same with Receiver (.3)	Fates, Edward (Ted)	0.90	668.25	2,079.00	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.80	742.50	2,079.00
		2.80		\$2,079.00
Subtotal Fees				\$2,079.00
Discount				0.00
Total Fees				2,079.00

07/24/24 16:55:44 PROFORMA STATEMENT FOR MATTER 377432.00004 (Thomas C. Hebrank, as Receiver for PWCG) (Reporting)

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
Total Disbursements				0.00

**Attorney Billing Instructions**

<input type="checkbox"/>	BILL ALL	<input type="checkbox"/>	Hold
<input type="checkbox"/>	BILL FEES ONLY	<input type="checkbox"/>	Write Off
<input type="checkbox"/>	BILL COST ONLY	<input type="checkbox"/>	Transfer All

**Billing Instructions**

expires 6/30/2025: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

**Account Summary – As Of 07/24/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	5,843.25	5,393.25	450.00	98,058.30	91,240.20	6,818.10
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	11,417.25	10,397.25	1,020.00	89,161.20	89,161.20	6,818.10
Collected	0.00	0.00	0.00	11,417.25	10,397.25	1,020.00	95,979.30	89,161.20	6,818.10
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>2,079.00</b>	<b>2,079.00</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

07/24/24 16:55:44 PROFORMA STATEMENT FOR MATTER 377432.00004 (Thomas C. Hebrank, as Receiver for PWCG) (Reporting)

07/24/24 16:55:48 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: 06/04/24      Matter Name: Claims & Distributions  
 Proforma Number: 1284966  
 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		
04/08/24	9604393	Advise Receiver on distribution issues related to uncashed checks	Fates, Edward (Ted)	0.40	297.00	297.00	WO	HD	TR	_____
04/09/24	9580783	Respond to inquiry from investor re: distributions	Fates, Edward (Ted)	0.20	148.50	445.50	WO	HD	TR	_____
04/24/24	9597375	Analyze documents relating to deceased claimant's estate and advise A. Herren on beneficiary of claim in receivership	Fates, Edward (Ted)	0.60	445.50	891.00	WO	HD	TR	_____
04/25/24	9598565	Advise on content and revisions for monthly case update for investors (.4) analyze issues relating to death of claimants Ackley and Delight and requests to transfer claims to estate beneficiaries (.8) advise Receiver and A. Herren re: same (.4) call/emails with counsel for surviving heirs of claimant Ackley (.5)	Fates, Edward (Ted)	2.10	1,559.25	2,450.25	WO	HD	TR	_____
05/10/24	9617504	Analyze documents from attorney for heirs of deceased claimant and advise A. Herren re: change of ownership of claim	Fates, Edward (Ted)	0.60	445.50	2,895.75	WO	HD	TR	_____



07/24/24 16:55:48 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

**Fees for Matter 377432.00006.(Claims & Distributions)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/15/24	9623391	Advise A. Herren on issues relating to separation of previously combined investor claims of parent and (now adult) child	Fates, Edward (Ted)	0.40	297.00	3,192.75	WO	HD	TR	_____
05/16/24	9624372	Call with class counsel re: settlement distribution issues (.3) discuss same and tax issues relating to distributions with A. Herren (.4)	Fates, Edward (Ted)	0.70	519.75	3,712.50	WO	HD	TR	_____
05/20/24	9628639	Respond to inquiry re: distributions from counsel for investor	Fates, Edward (Ted)	0.20	148.50	3,861.00	WO	HD	TR	_____
06/07/24	9651697	Analyze and revise monthly update to investors regarding policies, maturities and distributions	Fates, Edward (Ted)	0.30	222.75	4,083.75	WO	HD	TR	_____
06/10/24	9653885	Review harassing emails from investors (.2) communications with Receiver and A. Herren re: same (.2) prepare email to investor re: same (.4)	Fates, Edward (Ted)	0.80	594.00	4,677.75	WO	HD	TR	_____
06/20/24	9666621	Respond to inquiry from counsel for investor re: future distributions	Fates, Edward (Ted)	0.20	148.50	4,826.25	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	6.50	742.50	4,826.25
		6.50		\$4,826.25
Subtotal Fees				\$4,826.25
Discount				0.00
Total Fees				4,826.25
Total Disbursements				0.00

07/24/24 16:55:48 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

**Attorney Billing Instructions**

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

---

**Billing Instructions**

expires 6/30/2025: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10
---

**Account Summary – As Of 07/24/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	563.85	563.85	0.00	6,503.85	6,503.85	0.00	166,503.60	166,503.60	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	6,311.25	6,311.25	0.00	161,120.16	161,120.16	0.00
Collected	0.00	0.00	0.00	6,311.25	6,311.25	0.00	161,120.16	161,120.16	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>5,390.10</b>	<b>5,390.10</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

07/24/24 16:55:50 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: 06/04/24      Matter Name: Employment/Fees  
 Proforma Number: 1284966      Client Matter Number:  
 Client/Matter Joint Group # 377432-1

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
04/25/24	9598542	Revisions to Receiver's 25th interim fee application	Fates, Edward (Ted)	0.40	297.00	297.00	WO	HD TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.40	742.50	297.00
		0.40		\$297.00
Subtotal Fees				\$297.00
Discount				0.00
Total Fees				297.00
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2025: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

07/24/24 16:55:50 PROFORMA STATEMENT FOR MATTER 377432.00009 (Thomas C. Hebrank, as Receiver for PWCG) (Employment/Fees)

**Account Summary – As Of 07/24/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	1,113.75	1,113.75	0.00	15,302.25	15,302.25	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	3,192.75	3,192.75	0.00	15,012.36	15,012.36	0.00
Collected	0.00	0.00	0.00	3,192.75	3,192.75	0.00	15,012.36	15,012.36	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>297.00</b>	<b>297.00</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

---

07/24/24 16:55:55 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: 06/04/24      Matter Name: MP&C Litigation  
 Proforma Number: 1284966  
 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
06/03/24	9646905	Analyze minute order relating to final report on class settlement distribution	Fates, Edward (Ted)	0.20	148.50	148.50	WO	HD TR
06/26/24	9674244	Advise A. Herren on issues relating to class settlement distribution checks	Fates, Edward (Ted)	0.30	222.75	371.25	WO	HD TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.50	742.50	371.25
		0.50		\$371.25
	Subtotal Fees			\$371.25
	Discount			0.00
	Total Fees			371.25
	Total Disbursements			0.00

**Attorney Billing Instructions**

- |   |                                       |
|---|---------------------------------------|
| <input type="checkbox"/> BILL ALL       | <input type="checkbox"/> Hold         |
| <input type="checkbox"/> BILL FEES ONLY | <input type="checkbox"/> Write Off    |
| <input type="checkbox"/> BILL COST ONLY | <input type="checkbox"/> Transfer All |

07/24/24 16:55:55 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

**Billing Instructions**

expires 6/30/2025: 10% off standard rates (automatic); no text editing; no conf calls; copies @ .10

**Account Summary – As Of 07/24/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	644.40	644.40	0.00	1,238.40	1,238.40	0.00	530,273.25	530,273.25	0.00
Unbilled Adj	0.00	0.00	0.00	24.30	24.30	0.00	87.70	87.70	0.00
Billed	0.00	0.00	0.00	38,221.56	38,221.56	0.00	529,287.88	529,287.88	0.00
Collected	0.00	0.00	0.00	38,221.56	38,221.56	0.00	529,287.88	529,287.88	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>1,015.65</b>	<b>1,015.65</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