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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

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

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

Date: December 16, 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-seventh interim application for approval  
4 and payment of fees and reimbursement of expenses (“Application”). This  
5 Application covers the period from July 1, 2024, through September 30, 2024  
6 (“Twenty-Seventh Application Period”), and seeks interim approval of \$7,889.85 in  
7 fees and \$450.00 in expenses, and an order authorizing the Receiver to pay, on an  
8 interim basis, 80% of the fees incurred (\$6,311.88) 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.  
28

1 Nos. 150, 152. The Court also approved the Receiver’s proposal to file reports and  
2 fee applications on a quarterly basis. *Id.*

3 **II. FEE APPLICATION**

4 This fee application should be read in conjunction with the Receiver’s  
5 Twenty-Seventh Interim Report (“Twenty-Seventh Report”) filed on November 12,  
6 2024 (Dkt. No. 650), which describes in detail the Receiver’s activities during the  
7 Twenty-Seventh Application Period. This Application seeks interim approval of  
8 \$7,889.85 in fees for a total of 9.50 hours worked, and payment on an interim basis  
9 of 80% of that amount, or \$6,311.88. The work performed is described task-by-task  
10 on Exhibit A and is broken down into the following categories:

Category	Hours	Amount
Reporting	3.10	\$2,734.65
Claims & Distributions	1.80	\$1,449.90
Employment/Fees	0.70	\$563.85
MPC Litigation	3.90	\$3,141.45
Total	9.50	\$7,889.85

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

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

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

25 **1. Reporting**

26 Allen Matkins’ time in this category focused on preparing the Receiver’s  
27 Twenty-Sixth Report. Dkt. 643. The report contains detailed descriptions of the  
28 Receiver’s activities during the second quarter of 2024, policy maturities, investor

1 communications, pending litigation, and post-receivership receipts and  
2 disbursements. The reports also include the Receiver’s recommendations for the  
3 continued administration of the receivership estate. The reasonable and necessary  
4 fees for work in this category total \$2,734.65.

5           2.     Claims & Distributions

6           Allen Matkins assisted the Receiver in resolving issues relating to investor  
7 claims and providing updates to investors through the receivership website and in  
8 response to their inquiries. The reasonable and necessary fees for work in this  
9 category total \$1,449.90.

10           3.     Employment/Fees

11           Allen Matkins does not charge for time spent preparing its own fee  
12 applications. The firm assisted the Receiver in preparing his Twenty-Sixth Interim  
13 Fee Application, which was filed on May 17, 2024. Dkt. 644. The reasonable and  
14 necessary fees for work in this category total \$563.85.

15           4.     MP&C Litigation

16           Allen Matkins’ work in this category focused on assisting the Receiver  
17 regarding issues relating to class settlement distribution checks and providing a final  
18 report on such distributions to the Los Angeles Superior Court. The reasonable and  
19 necessary fees for work in this category total \$3,141.45.

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

21           Allen Matkins requests the Court approve reimbursement of \$450.00 in out-  
22 of-pocket costs. The itemization of such expenses is summarized below by  
23 category.

Category	Total
E-Discovery	\$450.00
TOTAL	\$ 450.00

**IV. FEES AND COSTS INCURRED AND PAID TO DATE**

1 From inception of the receivership through September 30, 2024, the Receiver  
2 incurred fees and costs of \$751,818.99, of which amount \$141,143.76 is subject to  
3 holdback pending approval of the Receiver's final fee application at the conclusion  
4 of the receivership, \$20,184.93 is awaiting the Court's review and approval, and  
5 \$594,224.85 has been approved by the Court and paid to date. During the same time  
6 period, Allen Matkins has incurred fees and costs of \$1,810,559.90, of which  
7 amount \$353,527.01 is subject to holdback pending approval of Allen Matkins' final  
8 fee application at the conclusion of the receivership, \$8,339.85 is awaiting the  
9 Court's review and approval, and \$1,450,271.01 has been approved by the Court and  
10 paid to date.

**V. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE ALLOWED**

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

21 In allowing fees, a court should consider “the time, labor and skill required,  
22 but not necessarily that actually expended, in the proper performance of the duties  
23 imposed by the court upon the receiver[], the fair value of such time, labor and skill  
24 measured by conservative business standards, the degree of activity, integrity and  
25 dispatch with which the work is conducted and the result obtained.” *United States v.*  
26 *Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks  
27 omitted). In practical terms, receiver and professional compensation thus ultimately  
28 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 1.00 hours of work (\$742.50 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 **VI. CONCLUSION**

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

- 11 1. Approving Allen Matkins’ fees, on an interim basis, of \$7,889.85;
- 12 2. Authorizing and directing the Receiver to pay 80% of approved fees, or  
13 \$6,311.88, from the assets of the Receivership Entities;
- 14 3. Approving Allen Matkins’ costs in the amount of \$450.00 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: November 12, 2024

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**



10/24/24 10:48:16 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: 09/29/24      Matter Name: Reporting  
 Proforma Number: 1299300  
 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		
07/23/24	9704721	Work on Receiver's 26th interim report (.9) communications with Receiver re: same (.2)	Fates, Edward (Ted)	1.10	886.05	886.05	WO	HD	TR	_____
07/24/24	9705686	Revisions to Receiver's 26th interim report (.4) meet and confer communications with SEC counsel (.2) communications with law clerk for Judge Goddard (.3)	Fates, Edward (Ted)	0.90	724.95	1,611.00	WO	HD	TR	_____
08/22/24	9741977	Finalize Receiver's 26th interim report and exhibits	Fates, Edward (Ted)	0.30	241.65	1,852.65	WO	HD	TR	_____
09/03/24	9759521	Evaluate court order and follow-up with counsel related to status of accounting, policies and reporting matters, review accounting/report.	Zaro, David	0.40	441.00	2,293.65	WO	HD	TR	_____
09/23/24	9779749	Evaluate the notice from the court, follow-up on the status of receiver projections and cash flow, next steps.	Zaro, David	0.40	441.00	2,734.65	WO	HD	TR	_____

**Disbursements for Matter 377432.00004 (Reporting)**

Trans Date	Index	Type	Quantity	Amt
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10/24/24 10:48:16 PROFORMA STATEMENT FOR MATTER 377432.00004 (Thomas C. Hebrank, as Receiver for PWCG) (Reporting)

**Disbursements for Matter 377432.00004 (Reporting)**

Trans Date	Index	Type	Quantity	Amt				
07/01/24	2890783	EDISC – CS Disco, Inc. - Monthly Hosting for July 2024	0.00	150.00	WO	HD	TR	_____
08/01/24	2895449	EDISC – CS Disco, Inc. - Monthly Hosting for August 2024	0.00	150.00	WO	HD	TR	_____
09/01/24	2899474	EDISC – CS Disco, Inc. - Monthly Hosting for September 2024	0.00	150.00	WO	HD	TR	_____

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.80	1,102.50	882.00
001665	Fates, Edward (Ted)	2.30	805.50	1,852.65
		<u>3.10</u>		<u>\$2,734.65</u>
Subtotal Fees				\$2,734.65
Discount				0.00
Total Fees				2,734.65
Total Disbursements				450.00

**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 10/24/24**

	Fiscal YTD		Calendar YTD				LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,734.65	2,734.65	0.00	9,027.90	8,127.90	900.00	101,242.95	93,974.85	7,268.10
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	2,079.00	2,079.00	0.00	13,496.25	12,476.25	1,020.00	91,240.20	91,240.20	6,818.10
Collected	2,079.00	2,079.00	0.00	13,496.25	12,476.25	1,020.00	98,058.30	91,240.20	6,818.10

10/24/24 10:48:16 PROFORMA STATEMENT FOR MATTER 377432.00004 (Thomas C. Hebrank, as Receiver for PWCG) (Reporting)

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 Balance</b>	<b>3,184.65</b>	<b>2,734.65</b>	<b>450.00</b>						
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc Payment</b>	<b>0.00</b>								
<b>Client Trust Balance</b>	<b>0.00</b>								

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**Billing Address**

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

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10/24/24 10:48:16 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: 09/29/24      Matter Name: Claims & Distributions  
 Proforma Number: 1299300  
 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		
07/09/24	9688116	Call from counsel for claimants regarding status of portfolio and anticipated timing of future distributions	Fates, Edward (Ted)	0.40	322.20	322.20	WO	HD	TR	_____
07/15/24	9695051	Advise Receiver on monthly case update to claimants	Fates, Edward (Ted)	0.30	241.65	563.85	WO	HD	TR	_____
08/20/24	9738917	Revisions to Receiver's monthly update to claimants	Fates, Edward (Ted)	0.30	241.65	805.50	WO	HD	TR	_____
08/22/24	9741117	Advise Receiver re: responses to investor inquiries	Fates, Edward (Ted)	0.30	241.65	1,047.15	WO	HD	TR	_____
09/17/24	9772407	Assist Receiver with monthly case update to investors	Fates, Edward (Ted)	0.20	161.10	1,208.25	WO	HD	TR	_____
09/30/24	9787675	Analyze info about investor inquiry from A. Herren and advise on same	Fates, Edward (Ted)	0.30	241.65	1,449.90	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
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10/24/24 10:48:16 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

**Proforma Summary**

**Timekeeper**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.80	805.50	1,449.90
		<u>1.80</u>		<u>\$1,449.90</u>
Subtotal Fees				\$1,449.90
Discount				0.00
Total Fees				1,449.90
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 10/24/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,449.90	1,449.90	0.00	5,682.15	5,682.15	0.00	165,681.90	165,681.90	0.00
Unbilled Adj	0.00	0.00	0.00	3.15	3.15	0.00	9.81	9.81	0.00
Billed	3,115.35	3,115.35	0.00	9,426.60	9,426.60	0.00	164,235.51	164,235.51	0.00
Collected	3,115.35	3,115.35	0.00	9,426.60	9,426.60	0.00	164,235.51	164,235.51	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>1,449.90</b>	<b>1,449.90</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>									

10/24/24 10:48:16 PROFORMA STATEMENT FOR MATTER 377432.00006 (Thomas C. Hebrank, as Receiver for PWCG) (Claims & Distributions)

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**Billing Address**

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

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10/24/24 10:48:16 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: 09/29/24      Matter Name: Employment/Fees  
 Proforma Number: 1299300  
 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		
08/22/24	9741088	Finalize Receiver's 26th fee app, notice of hearing and proposed order	Fates, Edward (Ted)	0.20	161.10	161.10	WO	HD	TR	_____
09/16/24	9771848	Meet and confer communications with SEC counsel (.1) finalize Receiver fee application, notice of hearing and proposed order (.4)	Fates, Edward (Ted)	0.50	402.75	563.85	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.70	805.50	563.85
		0.70		\$563.85
Subtotal Fees				\$563.85
Discount				0.00
Total Fees				563.85
Total Disbursements				0.00

**Attorney Billing Instructions**

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

10/24/24 10:48:16 PROFORMA STATEMENT FOR MATTER 377432.00009 (Thomas C. Hebrank, as Receiver for PWCG) (Employment/Fees)

( ) 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 10/24/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	563.85	563.85	0.00	1,677.60	1,677.60	0.00	15,866.10	15,866.10	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	7.11	7.11	0.00
Billed	297.00	297.00	0.00	3,489.75	3,489.75	0.00	15,309.36	15,309.36	0.00
Collected	297.00	297.00	0.00	3,489.75	3,489.75	0.00	15,309.36	15,309.36	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>563.85</b>	<b>563.85</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



10/24/24 10:48:16 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward      Matter #: 377432.00011      Client Name: Thomas C. Hebrank, as Receiver for PWCG  
 (Ted)  
 Date of Last Billing: 09/29/24      Matter Name: MP&C Litigation  
 Proforma Number: 1299300  
 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		
07/22/24	9702428	Communications with Receiver and A. Herren re: class settlement distribution issues and unclaimed settlement funds	Fates, Edward (Ted)	0.80	644.40	644.40	WO	HD	TR	_____
07/23/24	9704760	Communications with class counsel re: uncashed distribution checks and CA unclaimed property fund	Fates, Edward (Ted)	0.30	241.65	886.05	WO	HD	TR	_____
07/30/24	9712915	Communications with Receiver and A. Herren regarding uncashed checks and turnover of funds to CA unclaimed property fund per MPC settlement agreement	Fates, Edward (Ted)	0.30	241.65	1,127.70	WO	HD	TR	_____
08/30/24	9755211	Communications with class counsel regarding report to state court on class settlement distributions	Fates, Edward (Ted)	0.70	563.85	1,691.55	WO	HD	TR	_____
09/03/24	9756604	Analyze state court order continuing class settlement case review (.1) communications with class counsel re: report on distributions (.1)	Fates, Edward (Ted)	0.20	161.10	1,852.65	WO	HD	TR	_____
09/12/24	9767348	Communications with Receiver and class counsel for MPC settlement regarding	Fates, Edward (Ted)	0.40	322.20	2,174.85	WO	HD	TR	_____

10/24/24 10:48:16 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
09/13/24	9787767	Discuss class settlement administrator declaration requested by class counsel with Receiver (.4) work on revisions to same (.5) communications with class counsel re: same (.3)	Fates, Edward (Ted)	1.20	966.60	3,141.45	WO	HD TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	3.90	805.50	3,141.45
		3.90		\$3,141.45
Subtotal Fees				\$3,141.45
Discount				0.00
Total Fees				3,141.45
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

**Account Summary – As Of 10/24/24**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,141.45	3,141.45	0.00	3,735.45	3,735.45	0.00	532,770.30	532,770.30	0.00
Unbilled Adj	0.00	0.00	0.00	24.30	24.30	0.00	87.70	87.70	0.00

10/24/24 10:48:16 PROFORMA STATEMENT FOR MATTER 377432.00011 (Thomas C. Hebrank, as Receiver for PWCG) (MP&C Litigation)

Billed	371.25	371.25	0.00	38,592.81	38,592.81	0.00	529,659.13	529,659.13	0.00
Collected	371.25	371.25	0.00	38,592.81	38,592.81	0.00	529,659.13	529,659.13	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>3,141.45</b>	<b>3,141.45</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

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**Billing Address**

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

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