

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:19-cv-02594-RM-SKC

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD, *et al.*,

Relief Defendants.

**MOTION FOR ORDER APPROVING AND AUTHORIZING PAYMENT OF
RECEIVER'S AND PROFESSIONALS' FEES AND COSTS
FROM OCTOBER 20, 2021 THROUGH DECEMBER 31, 2021**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

Mark B. Conlan of Gibbons P.C., as receiver ("Receiver"), by and through his counsel, hereby moves this Court for an order approving and authorizing for payment Receivership fees and costs incurred from the time of the appointment of Mark B. Conlan as successor receiver on October 20, 2021 through the end of the quarter, December 31, 2021 (the "First Expense Period"). The Receiver specifically moves the Court for an order approving and authorizing for payment Receivership fees and reimbursement of costs (the "Motion") as follows:

- a) Receiver's fees of \$19,215.00 and Receiver's costs of \$46.01 for a total of \$19,261.01 in connection with services described in detail below as well as on the

Receiver's invoice attached as Exhibit A to the Declaration of Mark B. Conlan filed contemporaneously herewith (the Conlan Declaration");

b) Receiver's counsel Gibbons P.C.'s ("Gibbons") fees of \$75,531.60 and Gibbons' costs of \$445.25 for a total of \$75,976.85 in connection with services described in detail below as well as on the Gibbons invoice attached as Exhibit A to the Declaration of David N. Crapo filed contemporaneously herewith (the "Crapo Declaration") and together with the Conlan Declaration (the "Conlan and Crapo Declarations");

c) Receiver's accountants, Rocky Mountain Advisory, LLC's ("RMA"), fees of \$12,078.00 and RMA's costs of \$136.61 for a total of \$12,214.61 in connection with services described in detail below as well as on RMA's invoice attached as Exhibit B to the Conlan Declaration;

d) Original Receiver firm Robb Evans and Associates, LLC's, ("Robb Evans") fees totaling \$7,513.65 and Robb Evans' costs of \$42.00 for a total of \$7,555.65 for transition services described in detail below as well as on Robb Evans' invoice attached as Exhibit C to the Conlan Declaration; and

e) Original Receiver's counsel at Barnes & Thornburg LLP's, ("Barnes & Thornburg") fees of \$17,988.70 and Barnes & Thornburg's costs of \$95.58 for a total of \$18,084.28 for transition services described in detail below as well as on Barnes & Thornburg's invoice attached as Exhibit D to the Conlan Declaration.

INTRODUCTION

This is the first Quarterly Fee Application pursuant to the Receiver Order, and covers the First Expense Period, from October 20, 2021 through December 31, 2021. The Motion is based

on the memorandum of points and authorities below, the Conlan and Crapo Declarations, upon the pleadings, records and files of the Court in this case of which the Receiver requests the Court to take judicial notice, including without limitation the *Report of Receiver's Activities from October 20, 2021 through December 31, 2021* [ECF No. 310] (the "Receiver's First Report") and such other evidence as may be provided by the Receiver in support of the Motion.

The Motion is made pursuant to paragraphs 45-48 of the Order Appointing Receiver (ECF No. 153) (the "Receiver Order"). Paragraph 45 of the Receiver Order specifically provides for the Receiver to apply for compensation and expense reimbursement on a quarterly basis from Receivership Funds within 75 days after the end of each calendar quarter.

**STATEMENT REGARDING DUTY TO CONFER
PURSUANT TO D.C. COLO. LCivR 7.1(a)**

Pursuant to paragraph 45 of the Receiver Order, the Receiver is to serve upon counsel for the United States Securities and Exchange Commission ("SEC" or "Plaintiff") a complete copy of the Motion, together with all exhibits and relevant billing information in a format approved by the SEC within 30 days (the "SEC Deadline") prior to filing the Motion. The Plaintiff indicates that it has no objection to this Motion. The SEC agreed to extend the SEC Deadline for the First Expense Period to March 9, 2022.

The Receiver provided a copy of the first Quarterly Fee Application in advance to the following defendants: Mediatrix Capital Inc., Blue Isle Markets Inc., Blue Isle Markets Ltd., Michael S. Stewart, Victoria M. Stewart, Bryant E. Sewall and Hanna Ohonkova Sewall, as well as Attorneys for Defendant Michael S. Young, Maria C. Young, Salve Regina Trust, West Beach LLC, TF Alliance LLC, Hase Haus LLC and Casa Conejo LLC through their counsel. The Receiver received an objection to the first Quarterly Fee Application from Defendant Michael S.

Young and Relief Defendant Maria C. Young (the “Youngs”). No Defendants other than the Youngs have responded to the first Quarterly Fee Application.

The Receiver Order requires that the Court rule on the Motion for the payment of the Receiver's fees and expenses and those of its counsel and other professionals [ECF No. 153]. In addition the Receiver Order specifies certain procedures in connection with application for approval and authorization for Receiver's fees and cost reimbursement as generally described above and as set forth in detail at paragraphs 45-48 of the Receiver Order.

**MEMORANDUM OF POINTS AND AUTHORITIES,
STATEMENT OF FACTS AND SUMMARIES OF SERVICES**

Introduction and Statement of Facts

On September 11, 2020 the Court entered the Receiver Order appointing Brick Kane of Robb Evans & Associates LLC (the “Original Receiver”) as receiver over the (1) Entity Defendants; (2) the Receivership Assets of the Individual Defendants; and (3) the Recoverable Assets of the Receivership Relief Defendants, as those terms are defined therein. [ECF No. 153 at p. 2.] The Receiver Order provides that “[t]he Receiver shall have all powers, authorities, rights and privileges heretofore possessed by the officers, directors, managers and general and limited partners of the Receivership Defendants and the Receivership Relief Defendants under applicable state and federal law, by the governing charters, by-laws, articles and/or agreements in addition to all powers and authority of a receiver at equity, and all powers conferred upon a receiver by the provisions of 28 U.S.C. §§ 754, 959 and 1692, and Federal Rule of Civil Procedure 66.” (*Id.* at ¶ 1.)

On October 20, 2021, a docket order was entered substituting Mark Conlan of Gibbons P.C. as Receiver in this case, to function under the terms and conditions of the existing Receiver Order. (the “Appointment Order”) [ECF No. 284]

The Original Receiver’s duties and responsibilities under the Receiver Order required him to, among other things, identify, account for, and preserve and protect Receivership assets. To that end, the Receiver Order allowed him to “engage and employ persons in his discretion to assist him in carrying out his duties and responsibilities [under the Receiver Order], including, but not limited to ... attorneys...” (*Id.* at ¶ 4.F.)

SUMMARY OF SERVICES BY RECEIVER AND HIS COUNSEL, GIBBONS P.C.

Employment Applications

Given the Receiver’s need for assistance of counsel, on October 29, 2021, the Receiver and his counsel filed an Unopposed Motion for Order Authorizing Employment of Gibbons P.C. as Counsel for Receiver, *nunc pro tunc* to October 20, 2021, which was granted on November 1, 2021 (ECF Nos. 288 and 291).

The Receiver and his counsel also determined that accounting assistance was necessary in this matter to assist with forensic accounting, advisory services, financial analysis, bookkeeping as well as required quarterly status and other reporting. Therefore, on November 1, 2021, the Receiver engaged RMA in Salt Lake City, Utah to serve as the Receiver’s accountants in this matter.

The Receiver and his counsel also engaged James Hankins of ACR Realty, Inc. in Plano, Texas on December 23, 2021 to re-list the real property located at 1197 Lloyds Road, Little Elm, Texas for sale.

Asset Analysis and Recovery; Business Operations; and Case Administration

Shortly after the Court issued the Appointment Order, the Receiver, by and through Gibbons, filed miscellaneous actions under 28 U.S.C. § 754 in the United States District Courts of Arizona, the Eastern and Northern Districts of Texas, the District of Puerto Rico, and the Middle District of Florida.

The Receiver and Gibbons personnel communicated with personnel from the offices of the Plaintiff, offices of counsel for certain Defendants, and offices of the Original Receiver and his counsel to ascertain the status of and issues regarding real property assets, personal property assets, and other assets. Of course, the majority of these communications in the initial quarter concerned the transition of Receivership operations from Robb Evans & Associates LLC and their counsel at Barnes & Thornburg LLP and such related administrative duties as establishing bank accounts, receipt of funds, obtaining insurance coverage on certain real property, informing vendors of the substitution, and coordinating the transfer of numerous electronic files and providing access to the Receiver's professionals, including Gibbons and RMA.

Litigation

In the 10th Circuit Appeals in case numbers 21-1061; 21-1075; and 21-1322; the Receiver and his counsel submitted a Motion to Substitute Mark B. Conlan as Receiver on December 23, 2021 that included a statement (mindful of the costs associated with appellate practice) that the Receiver's views were well represented by the Appellee's brief filed by the United States Securities & Exchange Commission and that the Receiver did not intend to file a brief in those appeals.

During this period the Receiver and his counsel sent 13 demand letters to 14 charitable organizations as well as nine demand letters to alleged asset freeze violators. To date, we have received signed tolling agreements from six charities and one alleged asset freeze violator.

In addition, the Receiver and his counsel are analyzing the most cost-effective means of recovering commission payments paid to certain brokers that introduced investors to Mediatrix. As an initial step, the Receiver and his counsel intend to send demand letters to brokers where contact information is available in the records.

The Receiver and his counsel have also identified potential avoidance actions, potential actions regarding vehicles and other personal property, as well as other potential litigation.

Asset Analysis and Recovery

1197 Lloyds Road Oak Point, TX is a 1.0 acre lot improved with a good quality metal building with four rollup doors. There is no residence, water service, or operating septic system. The Receiver has been informed by the listing agent that the property is not eligible for water, sewer or septic service under existing zoning regulations in Denton County, Texas. The Receiver's listing agent has received a purchase offer for \$170,000. A Sale Motion is anticipated and has been drafted. Updated appraisals have been requested.

On December 15, 2021, the Plaintiff filed a Motion to Modify Asset Freeze (the "Equiti Motion") regarding a potential settlement with Equity UK [ECF No. 295]. Michael Young and Maria Young filed a partial objection to the Equiti Motion [ECF No. 301]. The Receiver does not oppose the relief sought in the Equiti Motion, which was fully briefed as of January 18, 2022. As of March 16, 2022, the Court has not scheduled a hearing or ruled on the Motion.

SUMMARY OF SERVICES BY OTHER RECEIVER PROFESSIONALS

Rocky Mountain Advisory Services

The majority of RMA's services provided in the initial quarter were related to the transition of Receivership operations from Robb Evans & Associates LLC and included but are not limited to the following: extensive communications with the Receiver and his counsel at Gibbons, SEC personnel, Robb Evans personnel, and Barnes & Thornburg personnel; review and receipt of accounting data from the Original Receiver; coordination of the Receivership banking system; review and receipt of voluminous data from Robb Evans; review of numerous historical documents, including Original receiver reports; preparation of systems to assist in providing financial reporting for current and future quarterly report filings; review and verification of investor lists and contact information; as well as preparation of IRS Form 56; and preparation of payments to vendors. For additional detail, please see time entries on Exhibit B to the Conlan Declaration.

Barnes & Thornburg and Robb Evans Services

The Receiver and his counsel communicated with personnel from the offices of the Original Receiver and his counsel to ascertain the status of and issues regarding real property assets, personal property assets, and other assets. The majority of communications in the initial quarter concerned the transition of Receivership operations from Robb Evans and its counsel at Barnes & Thornburg as well as related coordination of administrative duties such as establishing bank accounts, receipt of funds, obtaining insurance coverage on certain real property, informing vendors of the substitution, and coordinating the transfer of and providing access to numerous

electronic files. For additional detail, please see time entries on Exhibit C and Exhibit D to the Conlan Declaration.

Receiver Order Requirements for Applications for Compensation

Paragraph 45 of the Receiver Order provides for the Receiver to apply for compensation and expense reimbursement on a quarterly basis from Receivership Funds within 75 days after the end of each calendar quarter. Further, paragraph 45 provides that 30 days prior to the filing of such motion, the Receiver is required to serve upon counsel for the SEC a complete copy of the motion, together with all declarations, exhibits and relevant billing information in a format approved by the SEC, which the Receiver has done.

Paragraph 46 of the Receiver Order provides that all Quarterly Fee Applications will be interim and subject to cost benefit and final reviews at the close of the Receivership. Paragraph 48 of the Receiver Order provides, among other things, that each Quarterly Fee Application shall comply with the terms of the Billing Instructions provided by the SEC to the Receiver; shall represent that the fees and expenses were incurred in the best interests of the Receivership Estate; and that the Receiver has not entered into any agreement with any person or entity concerning the amount of any compensation paid or to be paid from the Receivership Estate, or any sharing thereof. The requisite certifications are contained in the Conlan and Crapo Declarations.

FEEES AND COSTS OF THE RECEIVER AND HIS PROFESSIONALS ARE REASONABLE

It is a fundamental tenet of receivership law that expenses of administration incurred by the receiver, including those of the receiver, his counsel and others employed by him, constitute priority expenses for which compensation should be paid from the assets of the receivership. As explained in the leading treatise CLARK ON RECEIVERS:

The obligations and expenses which the court creates in its administration of the property are necessarily burdens on the property taken possession of, and this, irrespective of the question who may be the ultimate owner, or who may have the preferred lien, or who may invoke the receivership. The appointing court pledges its good faith that all duly authorized obligations incurred during the receivership shall be paid.

2 Clark, Ralph Ewing, *A Treatise on the Law and Practice of Receivers* § 637, p. 1052 (3rd ed. Rev. 1992).

The Receiver is an officer of the Court charged with a myriad of duties under the Receiver Order. Many of those duties, particularly at the outset of the appointment, do not lead to the direct and immediate recovery of assets or increase in the funds available for distribution to creditors. Because of the nature of the administrative and other services required in receiverships, the benefit a receiver confers on receivership property cannot be determined based solely on the increase or decrease in the value of property in the receiver's possession. As the Court explained in *Securities and Exchange Comm'n v. Elliott*, 953 F. 2d 1560, 1577 (11th Cir. 1992):

[I]t is sometimes difficult to ascertain what type of benefits a receiver has bestowed on receivership property [A] benefit to a secured party may take more subtle forms than a bare increase in monetary value. Even though a receiver may not have increased, or prevented a decrease in, the value of the collateral, if a receiver reasonably and diligently discharges his duties, he is entitled to compensation. [Citations omitted.]
Id at 1577.

The Court has broad discretion in determining the reasonableness of fees to be awarded a receiver. *See In re San Vicente Medical Partners Ltd.*, 962 F. 2d 1402, 1409-1410 (9th Cir. 1992). The Court may evaluate the time and effort expended by the Receiver with respect to specific projects and aspects of the administration of the estate, and may look to a number of different factors under the case law in approving receiver's and counsel's fees. *Id.* at 1409-1410.

This Motion establishes that during the First Expense Period, the Receiver and his professionals rendered reasonable, necessary and valuable services for the Receivership Estate that were beneficial to the Receivership Estate and the parties in interest. As demonstrated herein, including the supporting declarations and exhibits, the Receiver and his professionals have performed substantial and wide-ranging tasks that were beneficial to the Receivership Estate, including directly bringing funds into the Receivership Estate so that these funds could not be diverted, misused or concealed, as well as taking possession and control of parcels of real property and laying the groundwork for the subsequent sale of that property for the benefit of the Receivership Estate. *See Federal Trade Comm'n v. Capital Acquisitions & Mgmt. Corp.*, 2005 U.S. Dist. LEXIS 18504 (N.D. Ill. August 26, 2005). The Receiver submits the fees are reasonable in light of the services rendered, and the fees and costs requested should be awarded in their entirety.

The Receiver has sufficient funds on hand to pay the fees and costs incurred through December 31, 2021 and requested in the Motion. Based on the cash on hand reported in the *Report of Receiver's Activities from October 20, 2021 through December 31, 2021* [ECF No. 310] that was filed on January 28, 2022, the Receivership Estate has \$12,634,121.22 on hand net of accrued and unpaid fees and costs totaling \$125,255.90.¹

CONCLUSION

The Receiver respectfully requests that the Court grant the Motion in its entirety, authorize and approve for payment all of the fees incurred by the Receiver and his professionals as well as

¹ The current balance net of accrued fees is \$12,508,865.32.

transition fees generated by Robb Evans and Barnes & Thornburg as set forth herein, and enter the proposed order submitted concurrently herewith.

Respectfully submitted,

Dated: March 16, 2022

GIBBONS P.C.

By: /s/ David N. Crapo

David N. Crapo

One Gateway Center

Newark, NJ 07102

Telephone: (973) 596-4500

Facsimile: (973) 596-4545

Email: dcrapo@gibbonslaw.com

Counsel to Mark B. Conlan, as Receiver

Certificate of Service

I hereby certify that on March 16, 2022, I caused the foregoing to be electronically filed by means of the CM/ECF system.

Further, I certify that a copy of the foregoing was served on the same date, upon the following counsel of record via the Court's CM/ECF system and via email:

Mark L. Williams
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*Attorney for Defendant Michael S. Young,
Maria C. Young, Salve Regina Trust, West
Beach LLC, TF Alliance LLC, Hase Haus
LLC and Casa Conejo LLC*

Michael S. Stewart (Pro Se)
Email: defender1989@protonmail.com

Victoria M. Stewart (Pro Se)
Email: vstewart1989@gmail.com

Further, I certify that a copy of the foregoing was served on the same date upon the following non-CM/ECF participant by regular U.S. Mail: Aaron Stewart, 23800 North 73rd Place, Scottsdale, AZ 85255.

s/ David N. Crapo _____

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:19-cv-02594-RM-SKC

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD, *et al.*,

Relief Defendants.

**DECLARATION OF MARK B. CONLAN, ESQ., RECEIVER IN SUPPORT OF THE
MOTION FOR ORDER APPROVING AND AUTHORIZING PAYMENT OF
RECEIVER'S AND PROFESSIONALS' FEES AND COSTS
FROM OCTOBER 20, 2021 THROUGH DECEMBER 31, 2021**

I, Mark B. Conlan, declare:

1. I am a Director with the firm of Gibbons P.C. and the Court-appointed Receiver in the above-captioned case pursuant to the Court's Order entered on October 20, 2021 [ECF No. 284] ("Substitute Appointment Order"). I have personal knowledge of the matters set forth in this declaration and if I were called upon to testify as to these matters I could and would competently testify thereto.

2. This Declaration is submitted in support of the *Motion for Order Approving and Authorizing Payment of Receiver's and Professionals' Fees and Costs from October 20, 2021 through December 31, 2021* (the "First Quarterly Fee Application").

3. The Substitute Appointment Order directs me to function under the terms and conditions of the existing Order Appointing Receiver [ECF No. 153] ("Receiver Order").

4. Upon my appointment on October 20, 2021, I selected Gibbons P.C. to act as my counsel, effective the same date. On November 1, 2021, upon motion, the Court authorized the retention of Gibbons in the *Order Granting Unopposed Motion of Receiver, Mark B. Conlan, for Order Authorizing Employment of Gibbons P.C. as Counsel for the Receiver Nunc Pro Tunc to October 20, 2021* [ECF No. 291]. The invoice for Gibbons services in the First Expense Period is attached as Exhibit A to the Declaration of David N. Crapo filed contemporaneously herewith.

5. Attached hereto as Exhibit A is a true and correct copy of the Receiver's invoice for fees of \$19,215.00 and costs of \$46.01 for a total of \$19,261.01 for the First Expense Period.

6. Attached hereto as Exhibit B is a true and correct copy of the Receiver's accountants, Rocky Mountain Advisory, LLC's, ("RMA") invoice for RMA's fees of \$12,078.00 and RMA's costs of \$136.61 for a total of \$12,214.61 for the First Expense Period.

7. Attached hereto as Exhibit C is a true and correct copy of Original Receiver firm, Robb Evans and Associates, LLC's, fees totaling \$7,513.65 and Robb Evans' costs of \$42.00 for a total of \$7,555.65 for the First Expense Period.

8. Attached hereto as Exhibit D is a true and correct copy of Original Receiver counsel, Barnes & Thornburg LLP's, ("Barnes & Thornburg") invoice for Barnes & Thornburg's

fees of \$17,988.70 and Barnes & Thornburg's costs of \$95.58 for a total of \$18,084.28 for the First Expense Period.

9. In accordance with the Receiver Order, I certify that the First Quarterly Fee Application complies with the terms of the Billing Instructions provided by the SEC to the Receiver.

10. Further, I certify that the fees and costs in the First Quarterly Fee Application were incurred in the best interests of the Receivership Estate.

11. Further, I certify that I have not entered into any agreement with any person or entity concerning the amount of any compensation paid or to be paid from the Receivership Estate, or any sharing thereof.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on March 16, 2022 at Newark, New Jersey.

By: /s/ Mark B. Conlan, Esq.
Mark B. Conlan, Esq.

EXHIBIT A

Gibbons P.C.

Time Detail

Run Date: 2/23/2022

Client/Matter: 117199 106197	Mark Conlan Mark Conlan in his capacity as SEC Receiver for Mediat
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
10/27/2021	Review IRS form 8822-b (0.1); telephone call with P. Ulrich re: same(0.1); e-mails with G. Miller and J. Gifford re: IRS form 56 (0.1).	B70	02062	MC2	0.30	\$105.00
10/28/2021	Review and revise IRS Form 56, e-mail same to Josh Gifford	B70	02062	MC2	0.20	\$70.00
10/28/2021	Review, sign and transmit IRS Form 56 to Josh Gifford at Rocky Mountain Advisory.	B70	02062	MC2	0.20	\$70.00
	Sub-Total For Task:	B70			0.70	\$245.00
						Tax Issues
10/25/2021	Telephone call with N. Songonuga re: review of potential litigation claims.	B62	02062	MC2	0.30	\$105.00
10/29/2021	Review Young Plea Agreement.	B62	02062	MC2	0.20	\$70.00
11/04/2021	Conference call with N. Songonuga re: transfer of receivership from Robb Evans and Barnes & Thornburg and potential litigation claims.	B62	02062	MC2	1.00	\$350.00
01/05/2022	Reviewing background documents, including deposition transcript of James Mason.	B62	02062	MC2	1.50	\$525.00
01/26/2022	Review and analyze deposition transcript of Shawn Stewart.	B62	02062	MC2	0.50	\$175.00
01/28/2022	Review e-mail from N. Mitchell to Clerk for the E.D. of Texas re: docketing original receivership order.	B62	02062	MC2	0.10	\$35.00
	Sub-Total For Task:	B62			3.60	\$1,260.00
						Litigation
12/02/2021	Attend to e-mails with G. Caris, E. Rosen and R. Erekson re: payment of final fee order for prior receiver and firm.	B58	02062	MC2	0.10	\$35.00
12/02/2021	Attend to e-mails and telephone calls with R. Erekson and G. Caris re: professional fee claims.	B58	02062	MC2	0.20	\$70.00
12/03/2021	Attend to e-mails with R. Erekson, E. Rosen, G. Miller and G. Caris re: payment of approved professional fee claims.	B58	02062	MC2	0.20	\$70.00
	Sub-Total For Task:	B58			0.50	\$175.00
						Fee Applications
10/25/2021	Telephone call with N. Songonuga re: retention of professionals.	B56	02062	MC2	0.20	\$70.00
10/26/2021	Telephone calls with E. Rosen re: Gibbons retention application	B56	02062	MC2	0.20	\$70.00
10/26/2021	Telephone call with G. Miller at Rocky Mountain Advisory re: accountant retention.	B56	02062	MC2	0.60	\$210.00
10/27/2021	E-mails with G. Miller and E. Rosen re: retention application for Rocky Mountain Advisory.	B56	02062	MC2	0.10	\$35.00
10/28/2021	Attending to retention of accountant (0.1); e-mails with G. Miller and J. Curtis re: same (0.2).	B56	02062	MC2	0.30	\$105.00
10/29/2021	Attending to retention of RMA as accountants (0.1); e-mails with SEC counsel re: same (0.1).	B56	02062	MC2	0.20	\$70.00
11/01/2021	Review, sign and transmit RMA Engagement Letter.	B56	02062	MC2	0.20	\$70.00
01/20/2022	Review and revise Engelman Berger retention agreement (0.3); attend to e-mails re: same (0.2).	B56	02062	MC2	0.50	\$175.00
01/20/2022	Draft e-mail to SEC team re: retention of Engelman Berger firm.	B56	02062	MC2	0.20	\$70.00
	Sub-Total For Task:	B56			2.50	\$875.00
						Employment Applications
10/25/2021	Conference call with Gary Caris, E. Rosen, N. Songonuga and SEC Team re: case background and transition items.	B53	02062	MC2	3.00	\$1,050.00
10/27/2021	Teams call with Anita Jen (Robb Evans), Gary Caris, Ellen Rosen and Gil Miller re: transition issues and background.	B53	02062	MC2	1.30	\$455.00
10/29/2021	Telephone call with Morgan Wisbey (Stretto) re: terms of banking software contract (0.1); review and analyze same (0.3).	B53	02062	MC2	0.40	\$140.00
11/02/2021	Telephone call with E. Rosen re: file transfer from prior receiver's office.	B53	02062	MC2	0.10	\$35.00
11/03/2021	Attending to e-mails with Robb Evans re: transfer of prior receiver's files.	B53	02062	MC2	0.20	\$70.00
11/04/2021	Telephone call with E. Rosen re: Robb Evans file transfer.	B53	02062	MC2	0.10	\$35.00
11/10/2021	Telephone call with E. Rosen re: transfer of files from Robb Evans.	B53	02062	MC2	0.20	\$70.00
11/15/2021	Telephone call with D. Whitford re: missing Concordance database from Robb Evans production; attend to follow up e-mail with A. Jen and D. Whitford re: same.	B53	02062	MC2	0.10	\$35.00
11/19/2021	Review and revise cover letter to Raani Erekson re: transmittal of historical check stubs and invoices; e-mails with G. Borak re: same.	B53	02062	MC2	0.10	\$35.00
12/07/2021	Attend to e-mails with R. Erekson and G. Caris re: missing check to Robb Evans.	B53	02062	MC2	0.10	\$35.00
12/28/2021	Attend to e-mails with D. Crapo re: next steps.	B53	02062	MC2	0.10	\$35.00
12/29/2021	Prepare for and participate in call with D. Crapo re: reviewing checklist and next steps.	B53	02062	MC2	0.70	\$245.00
01/04/2022	Conference call with D. Crapo, S. McKenna, J. Felder and T. Bowen re: case status and next steps (split).	B53	02062	MC2	0.40	\$140.00
01/17/2022	E-mails with Prime Clerk re: website hosting.	B53	02062	MC2	0.10	\$35.00
01/25/2022	E-mails with E. Rosen re: quarterly report.	B53	02062	MC2	0.10	\$35.00

Gibbons P.C.Time Detail
Run Date: 2/23/2022

Client/Matter: 117199 106197	Mark Conlan Mark Conlan in his capacity as SEC Receiver for Mediat
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
	Sub-Total For Task:				7.00	\$2,450.00
	B53 Case Administration					
10/27/2021	Attend to e-mails with Gil Miller re: setting up receivership bank accounts and transition of Tax ID number.	B52	02062	MC2	0.30	\$105.00
11/01/2021	Attend to e-mails with S. McKenna and G. Miller re: RMA engagement letter.	B52	02062	MC2	0.20	\$70.00
11/01/2021	Review edits to Stretto Software Agreement (0.2); e-mails with Morgan Wisbey re: same (0.1).	B52	02062	MC2	0.30	\$105.00
11/04/2021	Attending to Stretto Software License Agreement (0.2); e-mails with Morgan Wisbey and G. Miller re: same (0.2).	B52	02062	MC2	0.40	\$140.00
11/08/2021	Attend to e-mails with East West Bank on setting up bank accounts.	B52	02062	MC2	0.10	\$35.00
11/08/2021	E-mails with G. Miller re: setting of receivership accounts.	B52	02062	MC2	0.10	\$35.00
11/08/2021	Telephone call with East West Bank re: completing bank forms.	B52	02062	MC2	0.20	\$70.00
11/08/2021	Attend to forms needed to open accounts at East West Bank (0.4); telephone call with J. Gifford at Rocky Mountain Advisory re: same (0.6); attend to e-mails with A. Jen at Robb Evans re: same (0.6).	B52	02062	MC2	1.60	\$560.00
11/09/2021	Telephone call with Stretto Banking re: web access.	B52	02062	MC2	0.40	\$140.00
11/09/2021	Attend to e-mails with East West Bank re: setting up bank accounts.	B52	02062	MC2	0.10	\$35.00
11/10/2021	Review wire confirmation from Robb Evans; circulate same to Gil Miller.	B52	02062	MC2	0.10	\$35.00
11/11/2021	Telephone call with John Curtis re: transfer of financial records from Robb Evans to RMA.	B52	02062	MC2	0.20	\$70.00
11/11/2021	Telephone calls with Morgan Wisbey re: installation of Stretto desktop banking software.	B52	02062	MC2	0.80	\$280.00
11/12/2021	Attend to e-mails with G. Miller and A. Jen re: wire confirmation.	B52	02062	MC2	0.10	\$35.00
11/15/2021	Telephone call with E. Rosen re: proposed use of outside e-discovery vendor.	B52	02062	MC2	0.10	\$35.00
11/16/2021	E-mails with M. Wisbey, G. Miller and SEC staff re: collateralization of East West Bank account.	B52	02062	MC2	0.20	\$70.00
11/16/2021	Telephone call with Gary Caris re: insurance coverage.	B52	02062	MC2	0.20	\$70.00
11/17/2021	Telephone call with Lee & Mason Insurance re: property insurance invoices for Florida, Texas and Colorado properties.	B52	02062	MC2	0.20	\$70.00
11/17/2021	Attend to e-mails with A. Jen, G. Caris, E. Rosen, N. Songonuga and Lee & Mason re: property maintenance contract and outstanding insurance invoices.	B52	02062	MC2	0.40	\$140.00
11/18/2021	Attending to e-mails with G. Miller and T. Ashmore re: placing insurance coverage on real property interests.	B52	02062	MC2	0.30	\$105.00
11/18/2021	Attend to e-mails with G. Caris and G. Miller re: replacing insurance underwriter on real properties.	B52	02062	MC2	0.10	\$35.00
11/18/2021	Telephone call with Robin Coons at Lee & Mason re: replacing insurance coverage (0.1); e-mails with G. Caris re: same (0.1).	B52	02062	MC2	0.20	\$70.00
11/18/2021	Review accounting records from Robb Evans, e-mails with G. Miller and J. Curtis re: same.	B52	02062	MC2	0.20	\$70.00
11/19/2021	Telephone call with Doug Snow re: placing insurance on Port Charlotte, Little Elm and Greenwood Village properties (0.2); attending to follow-up e-mails re: same (0.2).	B52	02062	MC2	0.40	\$140.00
11/19/2021	Review and approve check request from Raani Ereksan.	B52	02062	MC2	0.10	\$35.00
11/19/2021	Telephone call with E. Rosen re: information needed for insurance policies, e-mails with G. Caris re: same.	B52	02062	MC2	0.20	\$70.00
11/23/2021	Telephone call with E. Rosen re: Texas utility bills.	B52	02062	MC2	0.10	\$35.00
12/01/2021	Telephone call with N. Songonuga re: facts needed for insurance coverage of various properties (0.2), draft detailed e-mail to D. Snow re: same (0.2).	B52	02062	MC2	0.40	\$140.00
12/02/2021	E-mails with M. Wisbey re: hosting webpage.	B52	02062	MC2	0.10	\$35.00
12/06/2021	Attend to e-mails with T. Ashmore and D. Snow re: Insurance coverage for Colorado property.	B52	02062	MC2	0.30	\$105.00
12/06/2021	Attend to e-mails with M. Wisbey re: pricing for Stretto to host webpage per appointment order.	B52	02062	MC2	0.10	\$35.00
12/09/2021	Conference call with V. Drohan and D. Crapo re: jewelry, boat and property insurance (0.5); follow-up discussion with D. Crapo (0.2).	B52	02062	MC2	0.70	\$245.00
12/09/2021	Attend to e-mails with T. Ashmore, J. DePinto and G. Miller re: insurance on Colorado property.	B52	02062	MC2	0.20	\$70.00
12/09/2021	Confer with J. Wolak re: terms of insurance coverage.	B52	02062	MC2	0.20	\$70.00
12/09/2021	Conference call with SEC team, D. Crapo and J. Curtis re: bank statements, demand letters and insurance issues.	B52	02062	MC2	0.50	\$175.00
12/09/2021	Draft detailed e-mail to T. Ashmore re: need for insurance on Colorado property.	B52	02062	MC2	0.20	\$70.00
12/09/2021	Telephone call with D. Crapo re: insurance on Colorado property.	B52	02062	MC2	0.10	\$35.00
12/09/2021	Telephone call with Tracy Ashmore re: placement of insurance.	B52	02062	MC2	0.20	\$70.00
12/09/2021	E-mails with D. Snow re: insurance issues.	B52	02062	MC2	0.10	\$35.00

Gibbons P.C.

Time Detail

Run Date: 2/23/2022

Client/Matter: 117199 106197	Mark Conlan Mark Conlan in his capacity as SEC Receiver for Mediat
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
12/09/2021	Telephone call with John Patento re: placement of insurance on Colorado property.	B52	02062	MC2	0.20	\$70.00
12/13/2021	E-mails with G. Caris re: insurance invoices.	B52	02062	MC2	0.10	\$35.00
12/13/2021	Attend to e-mails with J. DePinto and D. Crapo re: insurance on Young property in Colorado.	B52	02062	MC2	0.10	\$35.00
12/13/2021	Telephone call with T. Ashmore re: insurance on Young residence.	B52	02062	MC2	0.10	\$35.00
12/14/2021	Attend to e-mails with R. Ereksen re: approval of insurance invoices.	B52	02062	MC2	0.10	\$35.00
12/15/2021	E-mails with M. Wisbey confirming name on bank accounts complies with appointment order.	B52	02062	MC2	0.10	\$35.00
12/15/2021	Attend to e-mails with J. Waldron re: hosting webpage.	B52	02062	MC2	0.20	\$70.00
01/07/2022	Attend to e-mails with G. Caris and R. Ereksen re: payment of insurance invoices.	B52	02062	MC2	0.10	\$35.00
01/07/2022	Telephone call with J. DePinto (insurance broker) on replacement (0.2); draft follow up e-mail with exhibits to J. DePinto re: insurance on Greenwood Village property (0.2).	B52	02062	MC2	0.40	\$140.00
01/08/2022	Attend to e-mails with V. Drohan re: Arroyo Road Insurance.	B52	02062	MC2	0.10	\$35.00
01/11/2022	Attend to e-mails with R. Ereksen re: payment of insurance invoices.	B52	02062	MC2	0.10	\$35.00
01/13/2022	Telephone call with V. Drohan re: insurance coverage on Scottsdale property.	B52	02062	MC2	0.20	\$70.00
01/13/2022	Attend to e-mails with H. Topitz re: insurance issues.	B52	02062	MC2	0.20	\$70.00
01/14/2022	Attend to e-mails with T. Ashmore re: insurance on Greenwood Village residence.	B52	02062	MC2	0.20	\$70.00
01/18/2022	E-mails with G. Miller re: case webpage.	B52	02062	MC2	0.10	\$35.00
01/19/2022	E-mails with E. Rosen re: website layout.	B52	02062	MC2	0.10	\$35.00
	Sub-Total For Task: B52 Business Operations				13.10	\$4,585.00
10/20/2021	Telephone call with S. McKenna, M. Williams and J. Felder re: background and transition issues.	B50	02062	MC2	1.00	\$350.00
10/20/2021	Attend to e-mails with K. Johnson, G. Caris and SEC team re: transition call.	B50	02062	MC2	0.20	\$70.00
10/20/2021	E-mails with team re: identification of estate assets.	B50	02062	MC2	0.20	\$70.00
10/20/2021	Call with N. Songonuga and E. Rosen re: transition of receivership estate.	B50	02062	MC2	0.80	\$280.00
10/20/2021	Review and analyze ECF Nos. 4 and 5 for background information.	B50	02062	MC2	1.40	\$490.00
10/21/2021	Telephone call with E. Rosen re: additional discovery needed on SEC investigation; draft follow-up e-mail to J. Felder re: same.	B50	02062	MC2	0.20	\$70.00
10/22/2021	Attend to e-mails with SEC Team, E. Rosen, N. Songonuga and G. Caris re: transition.	B50	02062	MC2	0.10	\$35.00
10/22/2021	Telephone call with E. Rosen re: SEC exhibits.	B50	02062	MC2	0.10	\$35.00
10/25/2021	Reviewing documents and preparing for background call with former receiver's counsel and SEC team.	B50	02062	MC2	1.30	\$455.00
10/26/2021	Conference call with SEC team re: proposed settlement with Equiti.	B50	02062	MC2	0.80	\$280.00
10/27/2021	Telephone calls with E. Rosen re: asset accounting.	B50	02062	MC2	0.20	\$70.00
10/29/2021	Telephone call with N. Songonuga re: deadline to bring avoidance clawback claims.	B50	02062	MC2	0.10	\$35.00
11/01/2021	Telephone call with N. Songonuga and T. Ashmore re: case background.	B50	02062	MC2	0.70	\$245.00
11/01/2021	Telephone call with N. Songonuga re: next steps.	B50	02062	MC2	0.30	\$105.00
11/03/2021	E-mails with N. Songonuga re: next steps.	B50	02062	MC2	0.10	\$35.00
11/03/2021	Review case checklist prepared by E. Rosen.	B50	02062	MC2	0.30	\$105.00
11/03/2021	Draft e-mail to N. Songonuga re: following up on Drohan retainer.	B50	02062	MC2	0.20	\$70.00
11/03/2021	Review background documents.	B50	02062	MC2	0.60	\$210.00
11/03/2021	Review background documents, including Sworn Asset listings, and prior receiver reports.	B50	02062	MC2	1.00	\$350.00
11/05/2021	Download and review SEC document production; e-mails with N. Songonuga and E. Rosen re: same.	B50	02062	MC2	0.50	\$175.00
11/05/2021	Prepare for call with G. Caris and N. Songonuga re: transition issues and next steps.	B50	02062	MC2	0.20	\$70.00
11/05/2021	Teams call with G. Caris and N. Songonuga re: transition items, including charities and brokers; follow-up calls with N. Songonuga and E. Rosen re: same.	B50	02062	MC2	1.40	\$490.00
11/05/2021	Teams call with G. Caris, G. Miller and N. Songonuga re: status of asset collections and potential litigation claims.	B50	02062	MC2	0.70	\$245.00
11/05/2021	Telephone call with N. Songonuga re: items to review and SEC counsel.	B50	02062	MC2	0.20	\$70.00
11/05/2021	Review notes of calls with SEC and Receiver's counsel.	B50	02062	MC2	0.40	\$140.00
11/09/2021	Reviewing Robb Evans documents; e-mail prior financial report to Gil Miller.	B50	02062	MC2	0.20	\$70.00
11/09/2021	Telephone call with Kevin Judiscak re: counsel for receiver in Arizona real property issues.	B50	02062	MC2	0.10	\$35.00

Gibbons P.C.Time Detail
Run Date: 2/23/2022

Client/Matter: 117199 106197	Mark Conlan Mark Conlan in his capacity as SEC Receiver for Mediat
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
11/09/2021	Telephone call to James Hankins re: 1197 Lloyd's Road listing.	B50	02062	MC2	0.10	\$35.00
11/10/2021	Telephone call with N. Songonuga re: agenda for call with SEC counsel.	B50	02062	MC2	0.10	\$35.00
11/10/2021	Teams call with N. Songonuga, D. Barney, Gil Miller and SEC team.	B50	02062	MC2	1.40	\$490.00
11/10/2021	Review agenda for call with SEC team.	B50	02062	MC2	0.20	\$70.00
11/15/2021	Telephone call with Jim Hankins, real estate broker for 1197 Lloyd's Road.	B50	02062	MC2	0.10	\$35.00
11/15/2021	E-mails with N. Songonuga re: disposition of real property.	B50	02062	MC2	0.10	\$35.00
11/15/2021	Review e-mail from investor David Motes; draft follow-up e-mail to N. Songonuga re: same.	B50	02062	MC2	0.10	\$35.00
11/16/2021	E-mails with N. Songonuga re: disposition of boat and Land Rover.	B50	02062	MC2	0.10	\$35.00
11/16/2021	E-mails with J. Hankins and E. Rosen re: 1197 Lloyd's Road appraisal and Broker's Opinion of Value.	B50	02062	MC2	0.20	\$70.00
11/16/2021	Review and analyze zoning map for Little Elm, TX.	B50	02062	MC2	0.20	\$70.00
11/18/2021	Confer with D. Barney re: sale of 38' Sea Vee boat [0.1]; telephone call with D. Barney and V. Drohan re: same [0.2].	B50	02062	MC2	0.30	\$105.00
11/23/2021	Attend to e-mails with Jim Hankins re: re-listing 1197 Lloyd's Road property.	B50	02062	MC2	0.30	\$105.00
11/30/2021	Attend to e-mails with J. Hankins and D. Crapo re: listing agreement for 1197 Lloyd's Road.	B50	02062	MC2	0.10	\$35.00
11/30/2021	Review and respond to e-mail from D. Crapo re: review of listing agreement for 1197 Lloyd's Road property.	B50	02062	MC2	0.10	\$35.00
12/01/2021	Review and download Receiver's Last Report and Accounting; circulate same to D. Crapo for review.	B50	02062	MC2	0.10	\$35.00
12/01/2021	Due diligence on 1197 Lloyds Road property (0.1); attend to e-mails with D. Crapo re: finalizing listing agreement (0.1).	B50	02062	MC2	0.20	\$70.00
12/07/2021	Review accounting files (0.3); draft follow up e-mail to J. Felder, J. Curtis and D. Crapo re: net winner analysis (0.3); telephone calls with N. Songonuga re: same (0.2).	B50	02062	MC2	0.80	\$280.00
12/08/2021	E-mails with D. Crapo re: agenda for calls with SEC and counsel.	B50	02062	MC2	0.20	\$70.00
12/13/2021	E-mails with D. Crapo re: 1197 Lloyds Road listing agreement.	B50	02062	MC2	0.20	\$70.00
12/14/2021	Due diligence on 38' yacht (0.1); e-mails with V. Drohan re: same (0.2).	B50	02062	MC2	0.30	\$105.00
12/14/2021	Review e-mail from J. Hankins re: prior offer on 1197 Lloyds Road property by Mr. Flynn; draft follow-up e-mail to D. Crapo re: same.	B50	02062	MC2	0.10	\$35.00
12/15/2021	Telephone call with S. McKenna re: motion to approve settlement with Equiti.	B50	02062	MC2	0.10	\$35.00
12/15/2021	E-mails with R. Erekson re: wire instructions for Equiti settlement.	B50	02062	MC2	0.10	\$35.00
12/17/2021	E-mails with Jim Hankins re: listing of 1197 Lloyds Road property.	B50	02062	MC2	0.10	\$35.00
12/22/2021	Review and sign listing agreement for 1197 Lloyds Road property (0.2); e-mails with D. Crapo re: same (0.2).	B50	02062	MC2	0.40	\$140.00
12/22/2021	Review purchase offer on 1197 Lloyds Road Property (0.1), draft follow up e-mail to G. Caris re: title to property (0.1).	B50	02062	MC2	0.20	\$70.00
12/22/2021	Due Diligence on 1197 Lloyds Road title.	B50	02062	MC2	0.20	\$70.00
12/22/2021	Review and respond to e-mail from J. Hankins re: offers on 1197 Lloyds Road.	B50	02062	MC2	0.20	\$70.00
12/22/2021	Review and analyze e-mail, correspondence and exhibits from FX Strategy Master Fund re: Mediatrix claim (0.6); attend to follow-up e-mails (0.2).	B50	02062	MC2	0.80	\$280.00
12/23/2021	Review and analyze Purchase Agreement for 1197 Lloyds Road property (0.2); draft follow-up e-mail to D. Crapo with edits to same (0.2).	B50	02062	MC2	0.40	\$140.00
12/23/2021	Attend to e-mails with J. Hankins and V. Drohan re: removal of unsightly storage container.	B50	02062	MC2	0.20	\$70.00
12/23/2021	Attend to e-mails with H. Sanders and SEC counsel re: submission received from FX Strategy Master Fund.	B50	02062	MC2	0.40	\$140.00
12/23/2021	E-mails with J. Hankins re: listing agreement.	B50	02062	MC2	0.10	\$35.00
12/23/2021	Review, sign and deliver revised listing agreement.	B50	02062	MC2	0.30	\$105.00
12/28/2021	E-mails with J. Hankins re: 1197 Lloyds Road listing agreement.	B50	02062	MC2	0.10	\$35.00
01/04/2022	E-mails with J. Hankins and N. Patterson re: updated survey on 1197 Lloyds Road property.	B50	02062	MC2	0.10	\$35.00
01/04/2022	Prepare for call with SEC team (0.1); telephone call with E. Rosen re: same (0.1).	B50	02062	MC2	0.20	\$70.00
01/05/2022	E-mails with D. Crapo and J. Hankins re: sale offer on 1197 Lloyds Road.	B50	02062	MC2	0.20	\$70.00
01/06/2022	Telephone call with J. Hankins re: 1197 Lloyds Road listing.	B50	02062	MC2	0.10	\$35.00
01/10/2022	Review and analyze December 2021 bank statement from East West Bank (0.1); attend to follow up e-mails with R. Erekson, G. Miller and E. Rosen re: same (0.1).	B50	02062	MC2	0.20	\$70.00
01/10/2022	Review revised purchase agreement for 1197 Lloyds Road property (0.1); attend to e-mails with D. Crapo re: same (0.1).	B50	02062	MC2	0.20	\$70.00

Gibbons P.C.

Time Detail

Run Date: 2/23/2022

Client/Matter: 117199 106197	Mark Conlan Mark Conlan in his capacity as SEC Receiver for Mediat
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value		
01/10/2022	Telephone call with D. Barney re: locating 38' Yellow Fin boat.	B50	02062	MC2	0.30	\$105.00		
01/11/2022	E-mails with E. Rosen and D. Crapo re: motion to approve sale of 1197 Lloyds Road property.	B50	02062	MC2	0.10	\$35.00		
01/13/2022	Review e-mail from D. Barney to Chris Illing, general manager of Paradise Harbor Marina re: missing boat.	B50	02062	MC2	0.10	\$35.00		
01/13/2022	Review results of asset searches on Westlaw (0.2); e-mails with Library re: same (0.1).	B50	02062	MC2	0.30	\$105.00		
01/13/2022	Telephone call with Susan Vanyo at The Arizona Group re: Scottsdale property (0.2); attend to follow up e-mails with S. Vanyo (0.2).	B50	02062	MC2	0.40	\$140.00		
01/17/2022	Attend to e-mails with J. Hankins re: mowing grass at 1197 Lloyds Road property.	B50	02062	MC2	0.10	\$35.00		
01/19/2022	E-mails with J. Hankins re: appraisal requirement (split).	B50	02062	MC2	0.10	\$35.00		
01/20/2022	E-mails with J. Secrest re: appraisal for 1197 Lloyds Road property.	B50	02062	MC2	0.10	\$35.00		
01/20/2022	Telephone call with D. Crapo re: retention of appraiser and broker for 1197 Lloyds Road sale motion.	B50	02062	MC2	0.10	\$35.00		
01/20/2022	E-mails with J. Hankins re: retention of second appraiser and broker.	B50	02062	MC2	0.20	\$70.00		
01/20/2022	Draft detailed e-mail to J. Brinen re: retention to record lis pendens on Greenwood Village Property.	B50	02062	MC2	0.40	\$140.00		
01/21/2022	Telephone call with Kevin Judiscak re: lis pendens (0.1); draft follow-up e-mail to SEC team re: same (0.1).	B50	02062	MC2	0.20	\$70.00		
01/21/2022	Attend to e-mails with J. Felder and K. Judiscak re: recorded Temporary Restraining Order.	B50	02062	MC2	0.10	\$35.00		
01/21/2022	Attend to e-mails with J. Curtis and E. Rosen re: 4th Quarterly report.	B50	02062	MC2	0.20	\$70.00		
01/24/2022	Attend to e-mails with E. Rosen and D. Crapo re: 4th Quarterly report.	B50	02062	MC2	0.20	\$70.00		
01/26/2022	Telephone call with E. Rosen re: 4th Quarterly report 2021 (0.1); e-mails with E. Rosen and J. Curtis re: same (0.1).	B50	02062	MC2	0.20	\$70.00		
01/26/2022	Review and approve engagement letter with Pyles Whatley for updated appraisal of 1197 Lloyds Road property; e-mails with G. Borak re: same.	B50	02062	MC2	0.10	\$35.00		
01/27/2022	Telephone calls with E. Rosen re: 4th Quarterly report 2021.	B50	02062	MC2	0.40	\$140.00		
01/27/2022	Review and analyze Robb Evans final report.	B50	02062	MC2	0.40	\$140.00		
01/28/2022	E-mails with J. Hankins and D. Crapo re: appraisals.	B50	02062	MC2	0.10	\$35.00		
01/28/2022	Telephone call with E. Rosen re: 4th Quarterly Report 2021.	B50	02062	MC2	0.20	\$70.00		
Sub-Total For Task:					B50	Asset Analysis and Recovery	27.50	\$9,625.00
Total For Matter:					106197	Mark Conlan in his capacity as SEC Recei	54.90	\$19,215.00
Totals For Client:							54.90	\$19,215.00

Gibbons P.C.

Time Summary
Run Date: 2/23/2022

Client/Matter: 117199 **Mark Conlan**

Atty Code	Initials	Attorney Name	Position	Hours	Avg Rate	Value
02062	MC2	Conlan, Mark	Director	54.90	\$350.00	\$19,215.00
Totals:				54.90		\$19,215.00

Gibbons P.C.

Fee Application
Run Date: 2/23/2022

Client/Matter: 117199 Mark Conlan

Task/ Code	Description Of Services	Hours	Value
B70	Tax Issues	0.70	\$245.00
B62	Litigation	3.60	\$1,260.00
B58	Fee Applications	0.50	\$175.00
B56	Employment Applications	2.50	\$875.00
B53	Case Administration	7.00	\$2,450.00
B52	Business Operations	13.10	\$4,585.00
B50	Asset Analysis and Recovery	27.50	\$9,625.00
Totals:		54.90	\$19,215.00

Gibbons P.C.

Fee Application
Run Date: 2/23/2022

Client/Matter: 117199 Mark Conlan

Task Code	Description Of Services	Hours	Value
B70	<u>Tax Issues</u>		
	02062 Conlan, Mark	0.70	\$245.00
B70	Tax Issues	0.70	\$245.00
B62	<u>Litigation</u>		
	02062 Conlan, Mark	3.60	\$1,260.00
B62	Litigation	3.60	\$1,260.00
B58	<u>Fee Applications</u>		
	02062 Conlan, Mark	0.50	\$175.00
B58	Fee Applications	0.50	\$175.00
B56	<u>Employment Applications</u>		
	02062 Conlan, Mark	2.50	\$875.00
B56	Employment Applications	2.50	\$875.00
B53	<u>Case Administration</u>		
	02062 Conlan, Mark	7.00	\$2,450.00
B53	Case Administration	7.00	\$2,450.00
B52	<u>Business Operations</u>		
	02062 Conlan, Mark	13.10	\$4,585.00
B52	Business Operations	13.10	\$4,585.00
B50	<u>Asset Analysis and Recovery</u>		
	02062 Conlan, Mark	27.50	\$9,625.00
B50	Asset Analysis and Recovery	27.50	\$9,625.00
Totals:		54.90	\$19,215.00

Gibbons P.C.

Disbursement Detail
Run Date: 2/23/2022

<u>Client/Matter:</u>	117199	Mark Conlan
	106197	Mark Conlan in his capacity as SEC Receiver for Mediatrix Capital Inc., et al.

Disbursement Type: Expedited Delivery Service (Federal Express)

11/19/2021	Expedited Delivery Service (Federal Express)	To: FEDEX: Raani Erekson, SALT LAKE CITY UT	\$46.01
	Total:	Expedited Delivery Service (Federal Express)	\$46.01

Total Disbursements:	\$46.01
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EXHIBIT B



215 South State Street
 Suite 550
 Salt Lake City, UT 84111
 801.428.1600

Mark Conlan, Reciever
 Gibbons Law Firm

February 16, 2022
 Invoice # 15472

Billing for: 10/01/21 to 12/31/21

RE: SEC v. Mediatrix

Professional Services Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	
Gil A. Miller	6.10	425.00	\$2,592.50
John H. Curtis	14.60	305.00	\$4,453.00
Jordan Colohan	3.50	235.00	\$822.50
Josh Gifford	0.90	250.00	\$225.00
Jennie Messer	14.20	235.00	\$3,337.00
Heather Denison	2.40	225.00	\$540.00
Raani Ereksen	1.20	90.00	\$108.00

Professional Services Detail

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	
<u>Accounting</u>				
11/10/21	JHC	Reviewed tax return documents and cursory review of receivership QuickBooks file, including chart of accounts, asset and liability balances and report options (.5). Set up access to banking system to assist receiver with accounting and banking work (.4). Discussed financial records and issues with G. Miller (.3).	1.20	\$366.00
11/11/21	JHC	Call with M. Conlan regarding accounting data from former receiver's office and case issues (.3). Retrieved and reviewed documents, data and other information from former receiver and SEC (.9). Call with A. Jen regarding documents and data available and provided to M. Conlan's office (.2).	1.40	\$427.00
12/07/21	JHC	Meeting with H. Denison regarding accounting and quarterly reports (.4). Reviewed docket for quarterly report filings and electronic report file provided by former receiver (.3). Communications with M. Conlan regarding data for report on investor deposits and payments and arranged meeting with SEC (.3). Reviewed data from M. Conlan for sufficiency of data (.4).	1.40	\$427.00

Rocky Mountain Advisory, LLC

Mark Conlan, Reciever

February 16, 2022

Date	Init.	Description	Hours	
12/08/21	HD	Update QuickBooks with new banking information (.5). Review prior receiver reports to gain an understanding of case status and progress (1.0). Review prior tax returns to gain understanding on what is required moving forward (.3)	1.80	\$405.00
12/09/21	JHC	Prepared for meeting with the SEC and receiver, M. Conlan through review of schedule of bank transactions and summaries (.4). Meeting with SEC and M. Conlan regarding bank records, reports and schedules provided and other issues (.7). Met with and directed J. Messer in preparation of database for analysis of bank transactions and cash receipts and disbursements (.3).	1.40	\$427.00
	JM	Met with J. Curtis to discuss the case and outstanding tasks (.2). Analyzed the transactions within the various bank records received, prepared the transactions to be uploaded to a database, and created a database (1.8). Began standardizing the names of payees (.4).	2.40	\$564.00
12/10/21	HD	Updated QuickBooks with transactions which have transpired since the new receiver took over.	0.60	\$135.00
	JM	Standardized payee names for certain disbursements.	0.80	\$188.00
12/13/21	JM	Analyzed the transaction details received for accounts ending in 9344, 9449, 3192, 3272, 3352, 9312, 9582, 5788, 1911, 0573, 2424, 6478, 6486, and other bank accounts (.6) Converted bank transaction amounts to the US Dollar for accounts originally denominated in the Euro, Gold British Pound, or New Zealand Dollar (1.2). Examined transaction details provided to determine and standardize the payee or payor of each the bank transactions (4.1).	5.90	\$1,386.50
12/14/21	JHC	Met with and directed J. Messer in preparation of cash receipts and disbursements summaries, payment summaries and analyses.	0.40	\$122.00
	JM	Continued standardizing payee or payor names of each transaction, including several transfers between the different bank accounts, and noted findings during the analysis.	3.20	\$752.00
12/15/21	JM	Finished standardizing the names of each transaction (.8). Examined and prepared, for J. Curtis, reports that summarize payee and payor total deposits and disbursements (1.1).	1.90	\$446.50
12/16/21	JHC	Prepared summaries of cash receipts and disbursements for receiver and potential recovery actions (1.4). Analyzed data and made revisions to summaries (.4).	1.80	\$549.00
12/17/21	JHC	Prepared summaries of cash receipts and disbursements, including summaries of investor deposits and disbursements (.9). Added source data and information to summary schedules and provided to M. Conlan, receiver, for review (.4).	1.30	\$396.50
12/20/21	JHC	Prepared for and attended Teams meeting with M. Conlan and D. Crapo regarding summaries of deposits and disbursements, potential investors receiving excess disbursements and other case issues (.8). Call with J. Felder of SEC regarding addresses and contact information for investors and sales people (.4). Searched for and provided example demand letters to M. Conlan (.4). Reviewed data for investor contact information (.3).	1.90	\$579.50

Rocky Mountain Advisory, LLC

Mark Conlan, Reciever

February 16, 2022

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	
12/22/21	JHC	Prepared and reviewed summary of investor deposits and disbursements, including email address contact information and provided to M. Conlan, receiver, with explanation (.8). Reviewed various reports from SEC regarding investor data (.3).	1.10	\$335.50
SUBTOTAL:			[28.50	\$7,506.50]
<u>Case Administration</u>				
10/27/21	GAM	Initial status call with receiver and former receiver's counsel and office (1.3). Work with Stretto and receiver to set up new banking accounts (.5). Communications with R. Evans regarding tax ID number (.2).	2.00	\$850.00
10/28/21	JHC	Call with G. Miller regarding receivership work and background of case (.3). Email communication regarding engagement letter and retention information (.3).	0.60	\$183.00
10/29/21	GAM	Assist receiver with establishing bank account.	0.20	\$85.00
	JHC	Prepared engagement letter and made revisions and updates pursuant to comments from G. Miller (.5). Email communications with G. Miller (.2).	0.70	\$213.50
11/01/21	JHC	Updated engagement letter to be consistent with order appointing receiver and billing requirements (.2). Communications with G. Miller and counsel regarding retention (.2). Reviewed billing procedures and order appointing receiver to ensure compliance with the same (.2). Reviewed SEC billing instructions (.2).	0.80	\$244.00
11/05/21	GAM	Call with receiver and former receiver's counsel regarding documentation, forensic accounting, and fraudulent conveyances (.7). Review 1st, 2nd, and 3rd Receiver Status Reports (.5).	1.20	\$510.00
11/09/21	JHC	Reviewed email from M. Conlan, reviewed SEC reporting requirements and responded regarding standardized fund accounting report (.3). Reviewed email communications with G. Miller regarding obtaining financial records and requested access for obtaining data and documents (.3).	0.60	\$183.00
	GAM	Correspondence with receiver's office regarding documents we need; follow up with E. Rossen regarding shared folder for documents (.2). Correspondence with receiver regarding ongoing reporting and third quarter report (.1).	0.30	\$127.50
11/10/21	GAM	Communications with Stretto regarding opening of new bank account (.1). Email with former receiver office regarding transfer of funds (.1). Call with SEC regarding actions to pursue (1.40).	1.60	\$680.00
11/16/21	GAM	Respond to emails from receiver and Stretto regarding account collateralization.	0.30	\$127.50
11/18/21	GAM	Send request for quote email to broker.	0.10	\$42.50
11/19/21	RE	Communications with receiver regarding procedures for processing payments (.3). Prepare payments to vendors and document (.2).	0.50	\$45.00
	GAM	Assist receiver with new property insurance quotes.	0.20	\$85.00
12/03/21	RE	Prepare payments to professionals, overnight, and document (.3). Communications with bank regarding checks (.2).	0.50	\$45.00

Rocky Mountain Advisory, LLC

Page 4

Mark Conlan, Reciever

February 16, 2022

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	
12/03/21	GAM	Review final payment order for prior professionals and approve check amounts and descriptions.	0.20	\$85.00
12/14/21	RE	Prepare checks for two insurance payments and document.	0.20	\$18.00
SUBTOTAL:			[10.00	\$3,524.00]
<u>Claims Administration</u>				
12/21/21	JC	Discuss matter with J. Curtis and begin reviewing SEC prepared lists of investors and email addresses.	1.10	\$258.50
12/22/21	JC	Research investor email addresses and compare to SEC prepared lists (2.1). Update investor email addresses (.3).	2.40	\$564.00
SUBTOTAL:			[3.50	\$822.50]
<u>Tax Work</u>				
10/27/21	JG	Discuss tax reporting requirements of a successor receiver and prepare IRS Form 56.	0.90	\$225.00
SUBTOTAL:			[0.90	\$225.00]
Total for professional services rendered			42.90	\$12,078.00

Expenses

<u>Date</u>	<u>Init.</u>	<u>Description</u>		
<u>Copies</u>				
11/30/21	RE	Copying cost (5 copies at \$.15 per copy)		\$0.75
12/31/21	RE	Copying cost (3 copies at \$.15 per copy)		\$0.45
SUBTOTAL:			[\$1.20]
<u>Overnight Charges</u>				
12/07/21	RE	Overnight Expenses		\$98.16
12/17/21	RE	Overnight Expenses		\$35.66
SUBTOTAL:			[\$133.82]
<u>Postage</u>				
11/30/21	RE	Postage		\$1.59
SUBTOTAL:			[\$1.59]

Mark Conlan, Reciever

February 16, 2022

Total expenses	\$136.61
Total new charges	\$12,214.61
Balance due	\$12,214.61

EXHIBIT C

Robb Evans & Associates LLC

11450 Sheldon Street
Sun Valley, CA 91352

Invoice

Date	Invoice #
10/31/2021	Mediatrix15

Bill To
Mark Conlan Receiver of Mediatrix Capital

P.O. No.

Description	Qty	Rate	Amount
For professional services provided from 10/21/2021 to 10/31/2021 by:			
V. Miller	0.7	342.00	239.40
A. Jen	4.4	342.00	1,504.80
T. Chung	0.3	301.50	90.45
		Total	\$1,834.65

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
October-21

Name : M. Val Miller

Time Summary

Categories	Total Hours	Rate	Total amount
Asset Analysis and Recovery	-	342	-
Asset Disposition	-	342	-
Business Operations	-	342	-
Case Administration	0.70	342	239.40
Claims Administration and Objections	-	342	-
Employee Benefits/ Pensions	-	342	-
Accounting/Auditing	-	342	-
Business Analysis	-	342	-
Corporate Finance	-	342	-
Data Analysis	-	342	-
Status Reports	-	342	-
Litigation Consulting	-	342	-
Forensic Accounting	-	342	-
Tax Issues	-	342	-
Valuation	-	342	-
		342	
Total	<u>0.70</u>		<u>239.40</u>

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
For the Month of : October-21
Legal Activity : Case Administration
Name : M. Val Miller

Date	Description	Hours
10/18/21	Conference call with associate, Anita Jen, and receiver's counsel, Gary Caris re: proposed settlement agreement and administrative issues.	0.50
10/19/21	Email exchanges with associate and receiver's counsel, Gary Caris re: discussion with SEC counsel and appointment of a successor receiver.	0.20

**Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
October-21**

Name : Anita Jen

Time Summary

Categories	Total Hours	Rate	Total amount
Asset Analysis and Recovery	-	342	-
Asset Disposition	-	342	-
Business Operations	-	342	-
Case Administration	3.30	342	1,128.60
Claims Administration and Objections	-	342	-
Employee Benefits/ Pensions	-	342	-
Accounting/Auditing	0.80	342	273.60
Business Analysis	-	342	-
Corporate Finance	-	342	-
Data Analysis	-	342	-
Status Reports	-	342	-
Litigation Consulting	-	342	-
Forensic Accounting	-	342	-
Tax Issues	0.30	342	102.60
Valuation	-	342	-
		342	
Total	<u>4.40</u>		<u>1,504.80</u>

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
For the Month of : October-21
Legal Activity : Case Administration
Name : Anita Jen

Date	Description	Hours
10/25/21	Discussion with G. Caris re : conference call to discuss new Receiver	1.10
10/27/21	Prepare for meeting with M. Conlan	0.40
10/27/21	Discussions with G. Caris re : prepare for meeting with M. Conlan	0.60
10/27/21	Discussions with G. Caris, M. Conlan, E. Rosen, G. Miller re : transitions	1.20
10/29/21	Forward Port Charlotte property tax bill to M. Conlan, and confirm previous tax was paid	0.00

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
For the Month of : October-21
Financial Activity : Accounting/Auditing
Name : Anita Jen

Date	Description	Hours
10/25/21	Prepare final accounting	0.60
10/29/21	Prepare final accounting	0.20

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
For the Month of : October-21
Financial Activity : Tax Issues
Name : Anita Jen

Date	Description	Hours
10/27/21	Email received from G. Miller re : QSF tax ID, Call G. Miller to discuss QSF tax id; reply email to G. Miller re : providing QSF tax ID and request a completed form 8822b	0.20
10/27/21	Discussion with R. Han re : QSF EIN transferability	0.10

**Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
October-21**

Name : Tiffany Chung

Time Summary

Categories	Total Hours	Rate	Total amount
Asset Analysis and Recovery	-	301.5	-
Asset Disposition	-	301.5	-
Business Operations	-	301.5	-
Case Administration	0.30	301.5	90.45
Claims Administration and Objections	-	301.5	-
Employee Benefits/ Pensions	-	301.5	-
Accounting/Auditing	-	301.5	-
Business Analysis	-	301.5	-
Corporate Finance	-	301.5	-
Data Analysis	-	301.5	-
Status Reports	-	301.5	-
Litigation Consulting	-	301.5	-
Forensic Accounting	-	301.5	-
Tax Issues	-	301.5	-
Valuation	-	301.5	-
		301.5	
Total	<u>0.30</u>		<u>90.45</u>

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
For the Month of : October-21
Legal Activity : Case Administration
Name : Tiffany Chung

Date	Description	Hours
10/27/21	Search information and previous correspondences & information in response to inquiry from A. Jen. Email to A. Jen re: the same.	0.30

Robb Evans & Associates LLC

11450 Sheldon Street
Sun Valley, CA 91352

Invoice

Date	Invoice #
11/30/2021	Mediatrix16

Bill To
Mark Conlan Receiver of Mediatrix Capital

P.O. No.

Description	Qty	Rate	Amount
For professional services provided from 11/1/21 to 11/30/21 by:			
A. Jen	14.4	342.00	4,924.80
K. Johnson	1	301.50	301.50
C. DeCius	1.9	121.50	230.85
		Total	\$5,457.15

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
November-21

Name : Anita Jen

Time Summary

Categories	Total Hours	Rate	Total amount
Asset Analysis and Recovery	-	342	-
Asset Disposition	-	342	-
Business Operations	-	342	-
Case Administration	9.50	342	3,249.00
Claims Administration and Objections	-	342	-
Employee Benefits/ Pensions	-	342	-
Accounting/Auditing	4.90	342	1,675.80
Business Analysis	-	342	-
Corporate Finance	-	342	-
Data Analysis	-	342	-
Status Reports	-	342	-
Litigation Consulting	-	342	-
Forensic Accounting	-	342	-
Tax Issues	-	342	-
Valuation	-	342	-
		342	
Total	<u>14.40</u>		<u>4,924.80</u>

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
For the Month of : November-21
Legal Activity : Case Administration
Name : Anita Jen

Date	Description	Hours
11/3/21	Uploading files to M. Conlan	2.10
11/5/21	Discussion with G. Caris re : files sent to Receiver	0.10
11/5/21	Discussion with G. Caris re : discussion with M. Conlan	0.20
11/8/21	Provide M. Conlan W9 information	0.10
11/9/21	Discussions with G. Caris re : Wind up motion; information transfer to M. Conlan and G. Mill	1.10
11/9/21	Backup QBs file for G. Mill, upload tax files and QBs file to E. Rossen	0.40
11/10/21	Received email from G. Miller for transfer funds instructions; review fund balance, prepare bank reconciliations, prepare wire and confirm wire	0.60
11/10/21	Follow up with FedEx account # to send documents as requested by G. Miller	0.00
11/11/21	Left message with J. Curtis from Rocky Mountain Advisory, LLC re : to check with M. Conlan on the additional financial records and documents we may have for Mediatrx and related entities.	0.00
11/12/21	Discussions with G. Caris re : final accounting and wind up motion	0.30
11/15/21	Reply to M. Conlan re : Concordance database	0.00
11/17/21	Deal with residual issues; email to M. Conlan re : residual vendor issues	0.60
11/17/21	Discussions with G. Caris re : final report	0.20
11/17/21	Discussions with C. DeCius re : insurance issues	0.40
11/17/21	Discussions with G. Caris re : insurance issues	0.40
11/18/21	Discussion with G. Caris re : insurance issues	0.10
11/18/21	Review Motion and declarations, email redline back to G. Caris	1.50
11/18/21	Forward vendor bill received to Receiver for payment and update mailing informaiton	0.00
11/18/21	Discussion with G. Caris re : revised motion and declarations	0.10
11/18/21	Prepare final report package and send package to SEC for review	0.30

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
For the Month of : November-21
Legal Activity : Case Administration
Name : Anita Jen

Date	Description	Hours
11/19/21	read email forwarded from G. Caris re : insurance questions; call with C. DeCius re : Insurance issues	0.40
11/22/21	Resending final report package to SEC for review	0.30
11/23/21	Provide appraisal to M. Conlan for 1197 Lloyds	0.10
11/29/21	Search and provide title information re : 1197 Lloyd's Road	0.20
11/29/21	Upload 1197 Lloyd's Road title files to E. Rosen	0.00

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
For the Month of : November-21
Financial Activity : Accounting/Auditing
Name : Anita Jen

Date	Description	Hours
11/3/21	Prepare final accounting	0.10
11/5/21	Continue prepare final accounting	1.80
11/8/21	Continue prepare final accounting; prepare SEC SFAR	1.70
11/12/21	Reconcile funds wired to final accounting; update final accounting; email revised report to G. Caris	1.30

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
November-21

Name : Kenton Johnson

Time Summary

Categories	Total Hours	Rate	Total amount
Asset Analysis and Recovery	-	301.5	-
Asset Disposition	1.00	301.5	301.50
Business Operations	-	301.5	-
Case Administration	-	301.5	-
Claims Administration and Objections	-	301.5	-
Employee Benefits/ Pensions	-	301.5	-
Accounting/Auditing	-	301.5	-
Business Analysis	-	301.5	-
Corporate Finance	-	301.5	-
Data Analysis	-	301.5	-
Status Reports	-	301.5	-
Litigation Consulting	-	301.5	-
Forensic Accounting	-	301.5	-
Tax Issues	-	301.5	-
Valuation	-	301.5	-
		301.5	
Total	<u>1.00</u>		<u>301.50</u>

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
For the Month of : November-21
Legal Activity : Asset Disposition
Name : Kenton Johnson

Date	Description	Hours
11/17/21	Telephone call with attorney Caris about the valuation and marketing details for 1197 Lloyds Road and a potential discussion with the Receiver.	0.10
11/18/21	Telephone discussion with the real estate agent James Hankins to go over issues and information related to the 1197 Lloyds Road property.	0.20
11/30/21	Read email from the successor trustee forwarded by attorney Caris about the Azimuth Family Trust. Locate all correspondence with former trustee Jon Reynolds and forward response.	0.20
11/30/21	Telephone discussion with attorney Caris about the details of the Azimuth Family Trust and the conversations with former trustee Jon Reynolds.	0.20
11/30/21	Locate court docket records about the sale of the 1199 Lloyds Road property and the release of 1197 Lloyds Road property from the existing deed of trust. Confirm the Court ordered 1197 remain as frozen personal property of Bryant Sewall. Forward to attorney Caris.	0.30

**Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
November-21**

Name : Carl DeCius

Time Summary

Categories	Total Hours	Rate	Total amount
Asset Analysis and Recovery	-	121.5	-
Asset Disposition	-	121.5	-
Business Operations	-	121.5	-
Case Administration	1.90	121.5	230.85
Claims Administration and Objections	-	121.5	-
Employee Benefits/ Pensions	-	121.5	-
Accounting/Auditing	-	121.5	-
Business Analysis	-	121.5	-
Corporate Finance	-	121.5	-
Data Analysis	-	121.5	-
Status Reports	-	121.5	-
Litigation Consulting	-	121.5	-
Forensic Accounting	-	121.5	-
Tax Issues	-	121.5	-
Valuation	-	121.5	-
Total	<u>1.90</u>	121.5	<u>230.85</u>

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
For the Month of : November-21
Legal Activity : Case Administration
Name : Carl DeCius

Date	Description	Hours
11/19/21	Phone calls and email with insurance brokers and associates regarding reinstatement of existing policy and inquiries from new Receiver.	0.50
11/17/21	Phone calls and email with insurance brokers and associates regarding reinstatement of existing policy and inquiries from new Receiver. Work to reinstate coverage for Receivership properties.	1.10
11/23/21	Emails with broker for status.	0.10
11/24/21	Review new certificate of insurance for reinstated properties; forward and discuss with associates.	0.20

Robb Evans & Associates LLC

11450 Sheldon Street
Sun Valley, CA 91352

Invoice

Date	Invoice #
12/31/2021	Mediatrix17

Bill To
Mark Conlan Receiver of Mediatrix Capital

P.O. No.

Description	Qty	Rate	Amount
For professional services provided from 12/1/21 to 12/31/21 by:			
A. Jen	0.4	342.00	136.80
C. DeCius	0.7	121.50	85.05
		Total	\$221.85

**Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
December-21**

Name : Anita Jen

Time Summary

Categories	Total Hours	Rate	Total amount
Asset Analysis and Recovery	-	342	-
Asset Disposition	-	342	-
Business Operations	-	342	-
Case Administration	0.40	342	136.80
Claims Administration and Objections	-	342	-
Employee Benefits/ Pensions	-	342	-
Accounting/Auditing	-	342	-
Business Analysis	-	342	-
Corporate Finance	-	342	-
Data Analysis	-	342	-
Status Reports	-	342	-
Litigation Consulting	-	342	-
Forensic Accounting	-	342	-
Tax Issues	-	342	-
Valuation	-	342	-
		342	
Total	<u>0.40</u>		<u>136.80</u>

Fee Claims for: **Robb Evans & Associates LLC**
Case : **MEDIATRIX CAPITAL INC et al.**
For the Month of : **December-21**
Legal Activity : **Case Administration**
Name : **Anita Jen**

Date	Description	Hours
12/1/21	Discussion with G. Caris re : filing and request from Receiver	0.10
12/2/21	Discussion with G. Caris re : Order approving fees	0.10
12/7/21	Prepare and provide Excel version of the September 30th receivership report to John Curtis	0.20

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
December-21

Name : Carl DeCius

Time Summary

Categories	Total Hours	Rate	Total amount
Asset Analysis and Recovery	-	121.5	-
Asset Disposition	-	121.5	-
Business Operations	-	121.5	-
Case Administration	0.70	121.5	85.05
Claims Administration and Objections	-	121.5	-
Employee Benefits/ Pensions	-	121.5	-
Accounting/Auditing	-	121.5	-
Business Analysis	-	121.5	-
Corporate Finance	-	121.5	-
Data Analysis	-	121.5	-
Status Reports	-	121.5	-
Litigation Consulting	-	121.5	-
Forensic Accounting	-	121.5	-
Tax Issues	-	121.5	-
Valuation	-	121.5	-
		121.5	
Total	<u>0.70</u>		<u>85.05</u>

Fee Claims for: **Robb Evans & Associates LLC**
Case : **MEDIATRIX CAPITAL INC et al.**
For the Month of : **December-21**
Legal Activity : **Case Administration**
Name : **Carl DeCius**

Date	Description	Hours
12/13/21	Phone call and emails with Lee & Mason regarding revised insurance bills for reinstated properties. Prepare and forward bills for processing. Emails with G. Caris regarding billing matters.	0.60
12/16/21	Review and respond to email from insurance agent regarding payment details.	0.10

Robb Evans & Associates LLC

11450 Sheldon Street
Sun Valley, CA 91352

Statement

Date

1/18/2022

To:

Mark Conlan Receiver of Mediatrix Capital

					Amount Due	Amount Enc.
					\$42.00	
Date	Transaction				Amount	Balance
12/31/2021	Due 01/18/2022. K. Chapin 12/1/21~12/31/21 Inv # 2865mci				42.00	42.00
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due	
42.00	0.00	0.00	0.00	0.00	\$42.00	

Kenneth Chapin

P. O. Box 355
Lawndale, CA 90260

Invoice

BILL TO
BRICK KANE of ROBB EVANS AND ASSOCIATES MEDIATRIX CAPITAL, INC., et al. 11450 SHELDON STREET SUN VALLEY CA 91352

DATE	INVOICE #
1/1/2022	2865 mci

Date	DESCRIPTION	Hours	Amount
12/31/2021	Per Attached Detail for December 2021.	0.7	42.00
<i>Kenneth Chapin</i>			
Total			\$42.00

Kenneth Chapin
Fee Claim for Robb Evans & Associates, Receiver
Mediatrix Capital, Inc., et al.
28-Nov-21
4-Dec-21

Date	Description	Hours
28-Nov-21		0.00
29-Nov-21		0.00
30-Nov-21		0.00
1-Dec-21		0.00
2-Dec-21	Prepare and publish document to public website.	0.70
3-Dec-21		0.00
4-Dec-21		0.00
		0.70



Kenneth Chapin
1/1/2022

EXHIBIT D

BARNES & THORNBURG LLP

2029 Century Park East, Suite 300
Los Angeles, CA 90067-2904 U.S.A.
E.I.N. 35-0900596
(310) 284-3880

Invoice 2541420

ROBB EVANS & ASSOCIATES LLC
ATTN: ANITA JEN
11450 SHELDON STREET
SUN VALLEY, CA 91352-1121

November 11, 2021
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

Fees for Services	\$	6,277.00
Other Charges	\$	<u>0.00</u>
TOTAL THIS INVOICE	\$	6,277.00

REMITTANCE

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(310) 284-3880

Invoice 2541420

Page 2

ROBB EVANS & ASSOCIATES LLC
ATTN: ANITA JEN
11450 SHELDON STREET
SUN VALLEY, CA 91352-1121

November 11, 2021
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

00061044-000026
MEDIATRIX CAPITAL, INC.

For legal services rendered in connection with the above matter for the period ending October 31, 2021 as described on the attached detail.

Fees for Services \$ 6,277.00

TOTAL THIS INVOICE \$ 6,277.00

00061044-000026 ROBB EVANS & ASSOCIATES LLC

MEDIATRIX CAPITAL, INC.

ASSET ANALYSIS AND RECOVERY

10/27/21	GOC	Analyzed Youngs' reply to opposition to motion regarding collection activities against charities.	0.10	
SEC110	ASSET ANALYSIS AND RECOVERY		0.10	\$59.80

CASE ADMINISTRATION

10/24/21	GOC	Prepared for conference call with new receiver, his team and the SEC tomorrow; prepared detailed outline of items to be discussed.	2.80	
10/25/21	GOC	Telephoned A. Jen briefing her on the conference call with Conlan and the SEC and next steps.	1.10	
10/25/21	GOC	Had conference call with Conlan, Songonuga, Rosen, Williams, McKenna and Felder to address receivership and receiver transition issues.	2.90	
10/25/21	GOC	Coordinated delivery of documents for Anita Jen to package up with other documents for Conlan.	0.20	
10/25/21	CBM	Download and prepare documents received from SEC for client and transfer data to same.	1.00	
10/26/21	GOC	Telephoned Jen in preparation for call with Conlan and his team tomorrow; prepared and sent e-mails to A. Jen with spreadsheets for brokers and charities.	0.30	
10/27/21	GOC	Telephoned A. Jen regarding preparation for conference call with Conlan et al.	0.50	
10/27/21	GOC	Had telephone conference with Conlan, Rosen, Jen and Miller regarding receivership and transition issues.	1.20	
10/27/21	GOC	Telephoned A. Jen following our conference call with Conlan et al.	0.10	
10/27/21	GOC	Prepared for conference call with Conlan and his team this morning.	0.40	
10/27/21	GOC	Analyzed e-mails between Gil Miller and A. Jen and analyzed e-mail from Gil Miller to me regarding tax id issue.	0.20	
10/29/21	GOC	Exchanged e-mails with A. Jen regarding Charlotte County tax notice; analyzed e-mails between A. Jen and Conlan regarding same.	0.10	
10/29/21	GOC	Analyzed 10th Circuit letter; forwarded same to Conlan and his team.	0.10	
SEC140	CASE ADMINISTRATION		10.90	\$6,217.20

Fees for Services Total

\$6,277.00

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Gary O. Caris	10.00	\$598.00	\$5,980.00
Carla B. Montiel	1.00	\$297.00	\$297.00
TOTALS	11.00		\$6,277.00

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Invoice 2541420

ROBB EVANS & ASSOCIATES LLC
ATTN: ANITA JEN
11450 SHELDON STREET
SUN VALLEY, CA 91352-1121

November 11, 2021
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

Fees for Services	\$	6,277.00
Other Charges	\$	<u>0.00</u>
TOTAL THIS INVOICE	\$	6,277.00

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(310) 284-3880

Invoice 2555588

ROBB EVANS & ASSOCIATES LLC
ATTN: ANITA JEN
11450 SHELDON STREET
SUN VALLEY, CA 91352-1121

December 14, 2021
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

Fees for Services	\$	10,823.80
Other Charges	\$	<u>50.70</u>
TOTAL THIS INVOICE	\$	10,874.50

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Invoice 2555588

Page 2

ROBB EVANS & ASSOCIATES LLC
ATTN: ANITA JEN
11450 SHELDON STREET
SUN VALLEY, CA 91352-1121

December 14, 2021
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

00061044-000026
MEDIATRIX CAPITAL, INC.

For legal services rendered in connection with the above matter for the period ending November 30, 2021 as described on the attached detail.

Fees for Services	\$	10,823.80
Other Charges	\$	50.70
TOTAL THIS INVOICE	\$	10,874.50

00061044-000026 ROBB EVANS & ASSOCIATES LLC

MEDIATRIX CAPITAL, INC.

ASSET ANALYSIS AND RECOVERY

11/03/21	GOC	Prepared and sent e-mail to Conlan regarding various contact information.	0.30	
SEC110	ASSET ANALYSIS AND RECOVERY		0.30	\$179.40

CASE ADMINISTRATION

11/04/21	GOC	Exchanged e-mails with Songonuga regarding payment to Drohan.	0.10	
11/05/21	GOC	Had multiple telephone conferences with Conlan, Songonuga and G. Miller regarding charities, brokers and various other receivership issues.	1.50	
11/05/21	GOC	Telephoned A. Jen regarding transition issues and final report.	0.20	
11/05/21	GOC	Telephoned Jen regarding documents sent to Conlan.	0.10	
11/06/21	GOC	Reviewed and prepared suggested revisions to the final accounting; prepared and sent e-mail to A. Jen regarding same.	0.30	
11/08/21	GOC	Analyzed e-mails between Conlan and A. Jen regarding information for bank account opening.	0.10	
11/08/21	GOC	Exchanged e-mails with A. Jen regarding wind up financials.	0.10	
11/08/21	GOC	Selected and uploaded various documents for Conlan.	0.20	
11/09/21	GOC	Prepared and sent multiple e-mails to Conlan regarding Byron Brown and forwarding various ECF notices and e-mail from Drohan regarding appellate brief.	0.20	
11/09/21	GOC	Reviewed and redacted four Robb Evans & Associates bills and four Barnes & Thornburg bills in preparation for final wind-up motion (1.4 NO CHARGE).		NO CHARGE
11/09/21	GOC	Had multiple telephone calls with A. Jen regarding final financial report, wind up motion, and documents for G. Miller; exchanged e-mails with G. Miller and Conlan regarding documents for G. Miller.	1.10	
11/10/21	GOC	Exchanged e-mails with Conlan regarding pleadings to be electronically delivered; conferred with S. Moore regarding how to implement.	0.40	
11/11/21	GOC	Analyzed e-mail from Curtis to A. Jen; telephoned Jen regarding same.	0.10	
11/12/21	GOC	Prepared Caris declaration in support of final motion on behalf of Robb Evans & Associates LLC.	0.60	
11/12/21	GOC	Prepared proposed order for final motion on behalf of Robb Evans & Associates LLC.	0.80	
11/12/21	GOC	Prepared final motion on behalf of Robb Evans & Associates LLC, including its last report.	3.60	
11/12/21	GOC	Prepared Jen declaration in support of final motion on behalf of Robb Evans & Associates LLC.	0.80	
11/12/21	GOC	Telephoned Jen regarding issues for final accounting and wind up motion.	0.30	
11/12/21	GOC	Analyzed revised financials for wind up motion.	0.20	
11/15/21	GOC	Conferred with S. Moore and briefly reviewed documents to be uploaded for Conlan.	0.20	

00061044-000026 ROBB EVANS & ASSOCIATES LLC

Page 4

MEDIATRIX CAPITAL, INC.

11/15/21	GOC	Analyzed e-mail from Hogan; prepared and sent e-mail to Conlan attaching same.	0.10
11/16/21	GOC	Exchanged e-mails with Songonuga regarding lis pendens.	0.10
11/16/21	GOC	Reviewed and revised final wind up motion, Jen declaration, Caris declaration and proposed order.	2.40
11/17/21	GOC	Analyzed e-mails between A. Jen and Songonuga regarding invoices; exchanged e-mails with Songonuga and Conlan regarding same.	0.20
11/17/21	GOC	Received telephone call from A. Jen regarding property insurance issues.	0.40
11/17/21	GOC	Telephoned K. Johnson regarding 1197 Lloyds Road and Conlan's intent to call K. Johnson regarding same.	0.10
11/17/21	GOC	Prepared and sent e-mail to A. Jen regarding wind up motion.	0.10
11/17/21	GOC	Had multiple telephone calls with DeCius regarding real property insurance issues.	0.20
11/17/21	GOC	Prepared and sent e-mail to Conlan regarding property insurance.	0.10
11/17/21	GOC	Telephoned A. Jen regarding wind up motion and two invoices recently received.	0.20
11/17/21	GOC	Telephoned Conlan regarding insurance issues.	0.20
11/17/21	GOC	Prepared exhibits for wind up motion and supporting declarations.	0.10
11/18/21	GOC	Analyzed changes to wind up motion suggested by A. Jen.	0.10
11/18/21	GOC	Had multiple telephone calls with A. Jen regarding suggested changes to wind up motion, final revisions, and communications with SEC.	0.20
11/18/21	GOC	Revised wind up motion and supporting pleadings per A. Jen's comments; prepared and sent e-mail to A. Jen with revised pleadings for forwarding to the SEC.	0.30
11/18/21	GOC	Analyzed e-mails from DeCius regarding reinstatement of insurance and evidence of insurance on three properties.	0.10
11/18/21	GOC	Exchanged e-mails with Conlan regarding real property insurance issues.	0.10
11/18/21	GOC	Telephoned A. Jen regarding certificates of insurance.	0.10
11/19/21	GOC	Analyzed e-mail from DeCius regarding insurance status.	0.10
11/19/21	GOC	Exchanged e-mails with A. Jen regarding insurance issues and appraisal on 1197 Lloyds Road.	0.10
11/19/21	GOC	Exchanged e-mails with Conlan regarding insurance.	0.10
11/24/21	GOC	Exchanged e-mails with Drohan and Ashmore regarding final motion.	0.20
11/24/21	GOC	Analyzed certificates of insurance (five) covering three properties.	0.20
11/29/21	GOC	Exchanged e-mails with Rosen regarding title work on 1197 Lloyds Road; exchanged e-mails with A. Jen regarding same; reviewed documents located by A. Jen.	0.20
11/30/21	GOC	Exchanged e-mails with Songonuga regarding title on 1197 Lloyds; exchanged e-mails with K. Johnson regarding same.	0.30
11/30/21	GOC	Telephoned Drohan; she has no opposition to the wind up motion.	0.10
11/30/21	GOC	Telephoned K. Johnson regarding 1197 Lloyds Road.	0.20
11/30/21	GOC	Reviewed, revised and finalized wind up motion, declarations and proposed order to reflect that the motion is unopposed.	0.30

00061044-000026 ROBB EVANS & ASSOCIATES LLC

MEDIATRIX CAPITAL, INC.

SEC140	CASE ADMINISTRATION	17.80	\$10,644.40
Fees for Services Total			\$10,823.80

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Gary O. Caris	18.10	\$598.00	\$10,823.80
TOTALS	18.10		\$10,823.80

Other Charges:

Pacer Court Filing System Charges 10/01/2021-10/31/2021	1.10
Pacer Court Filing System Charges 10/01/2021-10/31/2021	1.80
Pacer Court Filing System Charges 10/01/2021-10/31/2021	3.00
Pacer Court Filing System Charges 10/01/2021-10/31/2021	3.90
Pacer Court Filing System Charges 10/01/2021-10/31/2021	3.90
Pacer Court Filing System Charges 10/01/2021-10/31/2021	3.00
Pacer Court Filing System Charges 10/01/2021-10/31/2021	31.00
Pacer Court Filing System Charges 10/01/2021-10/31/2021	3.00

\$ 50.70

BARNES & THORNBURG LLP

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Los Angeles, CA 90067-2904 U.S.A.
E.I.N. 35-0900596
(310) 284-3880

Invoice 2555588

ROBB EVANS & ASSOCIATES LLC
ATTN: ANITA JEN
11450 SHELDON STREET
SUN VALLEY, CA 91352-1121

December 14, 2021
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

Fees for Services	\$	10,823.80
Other Charges	\$	<u>50.70</u>
TOTAL THIS INVOICE	\$	10,874.50

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Invoice 2568501

ROBB EVANS & ASSOCIATES LLC
ATTN: ANITA JEN
11450 SHELDON STREET
SUN VALLEY, CA 91352-1121

January 24, 2022
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

Fees for Services	\$	837.20
Other Charges	\$	<u>44.88</u>
TOTAL THIS INVOICE	\$	882.08

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Invoice 2568501

Page 2

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ATTN: ANITA JEN
11450 SHELDON STREET
SUN VALLEY, CA 91352-1121

January 24, 2022
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

00061044-000026
MEDIATRIX CAPITAL, INC.

For legal services rendered in connection with the above matter for the period ending December 31, 2021 as described on the attached detail.

Fees for Services	\$	837.20
Other Charges	\$	44.88
TOTAL THIS INVOICE	\$	882.08

00061044-000026 ROBB EVANS & ASSOCIATES LLC

Page 3

MEDIATRIX CAPITAL, INC.

CASE ADMINISTRATION

12/01/21	GOC	Telephoned A. Jen regarding wind up motion and inquiry concerning 1197 Lloyds Road.	0.10
12/02/21	GOC	Analyzed entered wind up order; prepared and sent e-mail to Conlan regarding same; exchanged e-mails with A. Jen and Judiscak regarding same; gathered wire transfer information and exchanged e-mails with Conlan and G. Miller regarding payments.	0.30
12/03/21	GOC	Exchanged e-mails with Conlan and Songonuga regarding Brown.	0.10
12/13/21	GOC	Exchanged e-mails with Conlan regarding insurance bills; exchanged e-mails with A. Jen and DeCius regarding same.	0.30
12/13/21	GOC	Exchanged e-mails with DeCius regarding insurance bills; analyzed same.	0.20
12/20/21	GOC	Received telephone call from Rao (10th Circuit) regarding Receiver's status.	0.20
12/22/21	GOC	Exchanged e-mails with Conlan regarding 1197 Lloyds Road.	0.20
SEC140	CASE ADMINISTRATION		1.40
Fees for Services Total			\$837.20

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Gary O. Caris	1.40	\$598.00	\$837.20
TOTALS	1.40		\$837.20

Other Charges:

Postage	10.35
Conference Call Charges Inv# 3172361313-111221 Moderator Gary Caris Time of Call 10:27AM	26.43
Conference Call Charges Inv# 3172361313-111221 Moderator Gary Caris Time of Call 8:57AM	8.10

\$ 44.88

BARNES & THORNBURG LLP

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Invoice 2568501

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January 24, 2022
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

Fees for Services	\$	837.20
Other Charges	\$	<u>44.88</u>
TOTAL THIS INVOICE	\$	882.08

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:19-cv-02594-RM-SKC

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD, *et al.*,

Relief Defendants.

**DECLARATION OF DAVID N. CRAPO, ESQ., RECEIVER COUNSEL, IN SUPPORT
OF THE MOTION FOR ORDER APPROVING AND AUTHORIZING PAYMENT OF
RECEIVER'S AND PROFESSIONALS' FEES AND COSTS
FROM OCTOBER 20, 2021 THROUGH DECEMBER 31, 2021**

I, David N. Crapo, declare:

1. I am Counsel with the firm of Gibbons P.C. ("Gibbons") and counsel to Mark B. Conlan, as receiver (the "Receiver") in the above-captioned case pursuant to the Court's Order entered on October 20, 2021 [ECF No. 284] ("Substitute Appointment Order"). I have personal knowledge of the matters set forth in this declaration and if I were called upon to testify as to these matters I could and would competently testify thereto.

2. This Declaration is submitted in support of the *Motion for Order Approving and Authorizing Payment of Receiver's and Professionals' Fees and Costs from October 20, 2021 through December 31, 2021* (the "First Quarterly Fee Application").

3. Upon appointment on October 20, 2021, the Receiver selected Gibbons P.C. to act as his counsel, effective the same date. On November 1, 2021, upon motion, the Court authorized the retention of Gibbons in the *Order Granting Unopposed Motion of Receiver, Mark B. Conlan, for Order Authorizing Employment of Gibbons P.C. as Counsel for the Receiver Nunc Pro Tunc to October 20, 2021* [ECF No. 291].

4. Attached hereto as Exhibit A is a true and correct copy of Gibbons invoice for fees of \$75,531.60 and costs of \$445.25 for a total of \$75,976.85 for the First Expense Period.

5. In accordance with the Receiver Order, I certify that the First Quarterly Fee Application complies with the terms of the Billing Instructions provided by the SEC to the Receiver.

6. Further, I certify that the fees and costs in the First Quarterly Fee Application were incurred in the best interests of the Receivership Estate.

7. Further, I certify that I have not entered into any agreement with any person or entity concerning the amount of any compensation paid or to be paid from the Receivership Estate, or any sharing thereof.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on March 16, 2022 at Newark, New Jersey.

By: /s/ David N. Crapo, Esq.
David N. Crapo, Esq.

EXHIBIT A

Gibbons P.C.Time Detail
Run Date: 2/23/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
--	---

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
11/09/2021	Email with M. Conlan and N. Songonuga re: tax returns.	B70	26059	ER	0.10	\$27.45
11/09/2021	Review email from E. Rosen re Mediatrix's tax returns.	B70	30046	NS1	0.10	\$59.85
	Sub-Total For Task:	B70			0.20	\$87.30
10/20/2021	Review docket in 10th Circuit appeals.	B62	02062	MC2	0.50	\$299.25
10/29/2021	Review 10th Circuit briefing letter; draft follow up e-mail to J. Hradil and N. Songonuga re: same.	B62	02062	MC2	0.10	\$59.85
10/29/2021	Review briefing letter from 10th Circuit clerk, attend to follow-up e-mail to E. Rosen re: same.	B62	02062	MC2	0.10	\$59.85
10/29/2021	Review and receipt of 10th Circuit Order [0.2]; email with team re: same [0.1].	B62	26059	ER	0.30	\$82.35
11/01/2021	Review 10th Circuit docket.	B62	02062	MC2	0.30	\$179.55
11/01/2021	Review SEC complaint.	B62	02062	MC2	0.70	\$418.95
11/01/2021	Review 10/5/21 10th Circuit Order regarding deadlines [0.1]; docket detailed deadlines [0.2].	B62	26059	ER	0.30	\$82.35
11/01/2021	Review and receipt of 10th Circuit filings and related USDC filings [0.5]; email with team re: same [0.1].	B62	26059	ER	0.60	\$164.70
11/01/2021	Exchange emails with N. Mitchell re pulling of 10th Circuit appeal records.	B62	30046	NS1	0.10	\$59.85
11/02/2021	Review and analyze Young's 10th Circuit Opening Brief.	B62	02062	MC2	1.20	\$718.20
11/02/2021	Confer with J. Hradil re: 10th Circuit appeal.	B62	02062	MC2	0.30	\$179.55
11/02/2021	Reviewing documents re: 10th Circuit appeal on asset freeze.	B62	02062	MC2	1.30	\$778.05
11/07/2021	Attend to e-mails with G. Caris, N. Songonuga and J. Hradil re: Stewart and Sewall 10th Circuit opening brief.	B62	02062	MC2	0.10	\$59.85
11/08/2021	Telephone call with E. Rosen re: 10th Circuit appeal.	B62	02062	MC2	0.10	\$59.85
11/08/2021	E-mails with SEC team re: conference call on Litigation claims.	B62	02062	MC2	0.10	\$59.85
11/08/2021	Review Stewart and Sewall's 10th Circuit brief.	B62	02062	MC2	0.40	\$239.40
11/08/2021	Review and receipt of Appellants Joint 10th Circuit Brief.	B62	26059	ER	0.10	\$27.45
11/09/2021	Review corrected Stewart and Sewall Brief.	B62	02062	MC2	0.20	\$119.70
11/09/2021	Review and receipt of Appellants' 10th Circuit Joint Corrected Brief; email with team re: same.	B62	26059	ER	0.10	\$27.45
11/09/2021	Attend to emails with M. Conlan regarding discussion and emails with James Sallah re claims against Equiti (0.2); review class action complaint against Equiti (0.2).	B62	30046	NS1	0.40	\$239.40
11/09/2021	Review email from Vivian Drohan and M. Conlan re appeal brief (0.1); draft email to Ms. Drohan re service on prior receiver's counsel (0.1).	B62	30046	NS1	0.20	\$119.70
11/10/2021	Confer with M. Conlan re: potential fraudulent transfer actions and factual background.	B62	02518	DEB	0.70	\$418.95
11/10/2021	Review Motes class action complaint against Equiti.	B62	02518	DEB	0.70	\$418.95
11/10/2021	Prepare for and attend SEC call re: case background.	B62	02518	DEB	1.60	\$957.60
11/10/2021	Confer with D. Barney re: potential litigation claims.	B62	02062	MC2	0.70	\$418.95
11/11/2021	Reviewing witness deposition transcript for Stewart real estate broker.	B62	02062	MC2	0.50	\$299.25
11/11/2021	E-mails with SEC team re: 10th Circuit briefing.	B62	02062	MC2	0.10	\$59.85
11/11/2021	Import seven deposition transcripts with 65 exhibits into Case Notebook [0.8]; detailed email with team re: same [0.1].	B62	26059	ER	0.90	\$247.05
11/15/2021	Conference call with J. Hradil and SEC appellate team re: 10th Circuit appeal.	B62	02062	MC2	0.20	\$119.70
11/15/2021	Telephone call with SEC counsel regarding 10th Circuit brief.	B62	20967	JAH	0.10	\$59.85
11/15/2021	Assist M. Conlan regarding review of historical receivership data for delivery and for hosting by vendor.	B62	89266	DW	0.60	\$124.20
11/22/2021	Assist E. Rosen regarding the update of historical receivership data for delivery.	B62	89266	DW	0.30	\$62.10
12/15/2021	E-mails with S. McKenna, M. Williams and D. Crapo re: draft securities complaint against broker/dealer.	B62	02062	MC2	0.10	\$59.85
12/20/2021	Telephone call with 10th Circuit counsel re: motion to substitute party and waiver of briefing.	B62	02062	MC2	0.20	\$119.70
12/20/2021	Review 10th Circuit Order to file Motion to Substitute Party; e-mails with J. Hradil re: same.	B62	02062	MC2	0.10	\$59.85
12/20/2021	Reviewed Order from Tenth Circuit (0.1); conferred with A. Marino regarding motion (0.1).	B62	20967	JAH	0.20	\$119.70
12/20/2021	Call with J. Hradil to discuss motion (0.2); review case file and district court proceedings (0.8); draft Rule 43(a) motion to substitute party (1.7)	B62	30577	AJM1	2.70	\$886.95
12/21/2021	Review draft motion and email correspondence to appellant's counsel regarding same.	B62	20967	JAH	0.10	\$59.85
12/21/2021	Revise draft Rule 43(a) motion (0.8); email with J. Hradil re: same (0.1).	B62	30577	AJM1	0.90	\$295.65
12/23/2021	Telephone call with E. Rosen re: filing substitution with 10th Circuit.	B62	02062	MC2	0.10	\$59.85

Gibbons P.C.Time Detail
Run Date: 2/23/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
12/23/2021	Review and revise Rule 43 Substitution motion; e-mails with J. Hradil re: same.	B62	02062	MC2	0.10	\$59.85
12/23/2021	Telephone calls with E. Rosen and J. Hradil re: filing Notice of Appearance in 10th Circuit.	B62	02062	MC2	0.10	\$59.85
12/23/2021	Finalized and approved Motion to substitute Receiver in Tenth Circuit.	B62	20967	JAH	0.10	\$59.85
12/23/2021	Research facts for 10th Circuit Motion to Substitute [0.3]; draft Entry of Appearance [0.5]; file and serve Entry of Appearance and Motion to Substitute [0.5]; confer and email with team re: same [0.4].	B62	26059	ER	1.70	\$466.65
12/28/2021	Review and receipt of 10th Circuit Order Granting M. Conlan Receiver Motion to Substitute; docket deadline for Appellants reply.	B62	26059	ER	0.10	\$27.45
12/30/2021	Review 10th Circuit Clerk's Deficiency Notice; e-mails with J. Hradil and E. Rosen re: same.	B62	02062	MC2	0.10	\$59.85
12/30/2021	Email with team re: M. Conlan Entry of Appearance [0.1]; confer with 10th Circuit Clerk's Office re: same [0.1].	B62	26059	ER	0.20	\$54.90
12/31/2021	Attending to e-mails with E. Rosen re: 10th Circuit deficiency notice and SEC document production.	B62	02062	MC2	0.20	\$119.70
	Sub-Total For Task:	B62			20.90	\$9,791.10
10/22/2021	Attend to e-mails with E. Rosen re: preparation of retention application.	B56	02062	MC2	0.10	\$59.85
10/26/2021	Telephone with M. Conlan and G. Miller re: case background and RMA retention.	B56	02518	DEB	0.80	\$478.80
10/26/2021	Draft Conlan Declaration in support of Gibbons retention application.	B56	02062	MC2	0.50	\$299.25
10/26/2021	Draft N. Songonuga Declaration in support of retention papers authorizing Gibbons as counsel to receiver [1.0]; draft M. Conlan Declaration in support of retention papers authorizing Gibbons as counsel to receiver [0.2]; draft retention motion for Gibbons [1.6]; draft proposed order re: same [0.2]; draft Certificate of Service and current service list re: same [1.2]; confer and email with team re: retention papers [0.2].	B56	26059	ER	4.40	\$1,207.80
10/27/2021	Review and revise Gibbons retention application (0.4); e-mails with N. Songonuga and E. Rosen re: same (0.1).	B56	02062	MC2	0.50	\$299.25
10/27/2021	Email and confer with team re: N. Songonuga Declaration in Support of Gibbons Retention.	B56	26059	ER	0.20	\$54.90
10/27/2021	Review and revise retention pleadings, including declaration (0.4); confer with M. Conlan re same (0.3).	B56	30046	NS1	0.70	\$418.95
10/28/2021	Review and revise Gibbons retention application, supporting declaration, proposed form of order and certificate of service (0.4); confer with N. Songonuga re: same (0.3).	B56	02062	MC2	0.70	\$418.95
10/28/2021	Telephone calls with S. McKenna and N. Songonuga re: Gibbons Retention Motion.	B56	02062	MC2	0.10	\$59.85
10/28/2021	Draft portions of Retention Motion [0.1] draft portions of Conlan Declaration [0.1] draft portions of Songonuga Declaration [0.1] email and confer with team re: modifications to retention papers [0.2].	B56	26059	ER	0.50	\$137.25
10/28/2021	Confer and email with team re: retention motion for Gil Miller, Rocky Mountain Advisory.	B56	26059	ER	0.40	\$109.80
10/28/2021	Confer with M. Conlan re retention application (0.2); revise application and related documents (0.4).	B56	30046	NS1	0.60	\$359.10
10/28/2021	Draft email to counsel for SEC, defendants and other parties regarding unopposed retention application (0.2); review responses re: same (0.1); draft replies re: same (0.3).	B56	30046	NS1	0.50	\$299.25
10/28/2021	Review Receiver Order (0.1); exchange email with M. Conlan re retention of accountant (0.2).	B56	30046	NS1	0.30	\$179.55
10/29/2021	Final review of Gibbons Retention application.	B56	02062	MC2	0.20	\$119.70
10/29/2021	Draft Receiver Declaration in Support of Forthwith Motion [0.6]; draft proposed order [0.4]; email and confer with team re: same [0.1].	B56	26059	ER	1.10	\$301.95
10/29/2021	Prepare Retention Motion, Declarations, Proposed Order and Certificate of Service for electronic filing [0.2]; file and serve same [0.7]; coordinate email service [0.2]; email and confer with team re: same [0.2]; email proposed orders to chambers [0.1].	B56	26059	ER	1.40	\$384.30
10/29/2021	Revise Certificate of Service and service list [0.2]; verify service list [0.4]; email with team re: same [0.1].	B56	26059	ER	0.70	\$192.15
10/29/2021	Confer with chambers re: Forthwith Motion and proposed order [0.1]; detailed email with team re: same [0.1].	B56	26059	ER	0.20	\$54.90
10/29/2021	Call with M. Conlan re Gibbons retention motion.	B56	30046	NS1	0.10	\$59.85
10/29/2021	Draft motion for Forthwith Hearing; review and edit Receiver's Declaration in support of same and proposed order.	B56	30046	NS1	1.20	\$718.20
10/29/2021	Exchange numerous emails with E. Rosen re Motion for Forthwith Hearing.	B56	30046	NS1	0.30	\$179.55
	Sub-Total For Task:	B56			15.50	\$6,393.15
10/20/2021	Confer with M. Conlan and N. Songonuga in preparation for transitional call with Robb Evans firm (0.8); draft agenda re: same (0.2).	B53	26059	ER	1.00	\$274.50
10/20/2021	Call with M. Conlan in preparation for transitional call with Robb Evans firm.	B53	30046	NS1	0.70	\$418.95

Gibbons P.C.

Time Detail

Run Date: 2/23/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
10/21/2021	Docket review [0.1]; update agenda [0.3]; confer and email with team re: exhibits, to do list, and party list updates [0.2].	B53	26059	ER	0.60	\$164.70
10/21/2021	Docket conference call [0.1]; review and receipt of Felder Declaration exhibits [0.7].	B53	26059	ER	0.80	\$219.60
10/22/2021	Confer with team re: review and organization of Felder Declaration exhibits.	B53	26059	ER	0.10	\$27.45
10/22/2021	Review Felder Declaration for background in preparation for conference call (0.2); update agenda and parties information from review in preparation for conference call (0.3).	B53	26059	ER	0.50	\$137.25
10/24/2021	Review Felder Declaration for background in preparation for conference call (0.3); update agenda and parties data re: same in preparation for conference call (0.7).	B53	26059	ER	1.00	\$274.50
10/25/2021	Attend to e-mails with N. Songonuga and P. Crawford re: filing complaint and appointment order in Middle District of Florida.	B53	02062	MC2	0.20	\$119.70
10/25/2021	Prepare for conference call [0.1]; participate in conference call with SEC and prior receiver counsel [2.9].	B53	26059	ER	3.00	\$823.50
10/25/2021	Participate in call with SEC and prior receiver re transition to M. Conlan.	B53	30046	NS1	2.00	\$1,197.00
10/25/2021	Follow-up call with M. Conlan re next steps.	B53	30046	NS1	0.30	\$179.55
10/25/2021	Exchange emails with E. Rosen and M. Conlan re docketing of complaint and appointment orders in Arizona and Florida.	B53	30046	NS1	0.20	\$119.70
10/25/2021	Review agenda in preparation for call with SEC and prior receiver.	B53	30046	NS1	0.10	\$59.85
10/26/2021	Review receivership statutes and SEC information re: receiver's duties and authority.	B53	02518	DEB	0.70	\$418.95
10/26/2021	Review Mediatrix dockets in Arizona and Puerto Rico (0.2); attend to e-mails with E. Rosen and N. Songonuga re: supplementing same with substitute appointment order per 28 USC 754 (0.3).	B53	02062	MC2	0.50	\$299.25
10/26/2021	Review Judge Moore's civil practice standards.	B53	02062	MC2	0.20	\$119.70
10/26/2021	Reviewing historical receivership docket re: pending motion to terminate pre-judgment collection actions.	B53	02062	MC2	0.20	\$119.70
10/26/2021	Assist N. Songonuga and M. Conlan with preparation of documents to enforce new receivership order.	B53	26048	NM3	3.80	\$786.60
10/26/2021	PACER search to confirm identity of states where receiver appointment recorded [0.2]; create chart of same [0.1]; email with team re: same [0.1].	B53	26059	ER	0.40	\$109.80
10/26/2021	Draft letters for Florida, Texas, Puerto Rico, Arizona to docket Receiver letter (0.9); call with clerk of the District Court for the Eastern District of Texas regarding impact of close case (0.3); exchange numerous emails with M. Conlan and N. Mitchell re the foregoing (0.5).	B53	30046	NS1	1.70	\$1,017.45
10/27/2021	Attend to e-mails with N. Mitchell submission of substitute appointment orders to clerks of the District of Puerto Rico, Middle District of Florida, the Eastern and Northern Districts of Texas and the District of Arizona per 28 USC 754.	B53	02062	MC2	0.10	\$59.85
10/27/2021	Review and revise letter to Clerk for the Middle District of Florida re: recording complaint and appointment orders per 28 USC 754.	B53	02062	MC2	0.10	\$59.85
10/27/2021	Assist N. Songonuga and M. Conlan with preparation and filing of documents to enforce new receivership order.	B53	26048	NM3	0.80	\$165.60
10/27/2021	Email with G. Miller re: Conlan Appointment Order.	B53	26059	ER	0.10	\$27.45
10/27/2021	Conference call with M. Conlan, G. Caris, Anita Jen, and G. Miller re: transition of historical receivership documentation to Gibbons and background info regarding same [2.3]; review follow up emails re: same [0.1].	B53	26059	ER	2.40	\$658.80
10/27/2021	Email and confer with team re: letters registering M. Conlan receivership appointment in various states.	B53	26059	ER	0.20	\$54.90
10/27/2021	Finalize letters to the Clerk of the Court for Northern and Eastern Texas and Florida (0.2); confer with N. Mitchell re same (0.1).	B53	30046	NS1	0.30	\$179.55
10/28/2021	Telephone call with E. Rosen re: notice of substitute receiver in Arizona miscellaneous action.	B53	02062	MC2	0.10	\$59.85
10/28/2021	Complete portions of IRS Form 56 [0.2]; email and confer with team re: same [0.1].	B53	26059	ER	0.30	\$82.35
10/28/2021	Review and receipt of Youngs' Reply in Support of Collections Motion re: Charities.	B53	26059	ER	0.10	\$27.45
10/28/2021	Draft email to Receiver regarding Tracy Ashmore's request for a phone call.	B53	30046	NS1	0.10	\$59.85
10/29/2021	Assist N. Songonuga and M. Conlan with service of documents to enforce new receivership order.	B53	26048	NM3	0.40	\$82.80
10/29/2021	Email with N. Songonuga and T. Westerberg re: removing from service list.	B53	26059	ER	0.10	\$27.45
10/29/2021	Began legal research on Statute of Limitations (1.3); confer with M. Conlan re same (0.3).	B53	30046	NS1	1.60	\$957.60
10/29/2021	Confer with M. Conlan re Tracy Ashmore's request; draft email to T. Ashmore setting up call.	B53	30046	NS1	0.10	\$59.85
11/01/2021	Assist N. Songonuga with preparation and filing of letters to the Clerks of Court re: receivership.	B53	26048	NM3	0.30	\$62.10
11/01/2021	Update informal case checklist with latest information regarding projects and deadlines.	B53	26059	ER	0.20	\$54.90
11/02/2021	Review e-mail receipt of section 754 filing in the Middle District of Florida.	B53	02062	MC2	0.10	\$59.85
11/02/2021	Send Imanageshare requests for historical receivership documents to G. Caris and A. Jen [0.1]; email to G. Caris and A. Jen re: same [0.1].	B53	26059	ER	0.20	\$54.90

Gibbons P.C.

Time Detail

Run Date: 2/23/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
11/02/2021	Draft checklist of projects, deadlines, and staffing [0.9]; confer with team re: same [0.8]; email with team re: same [0.1].	B53	26059	ER	1.80	\$494.10
11/02/2021	Attend to emails from Barnes & Thornburg regarding historical document transition (0.1); confer with E. Rosen re same (0.1).	B53	30046	NS1	0.20	\$119.70
11/02/2021	Working session with E. Rosen on case checklist and deadlines.	B53	30046	NS1	0.80	\$478.80
11/03/2021	E-mails with G. Caris re: uploading Barnes & Thornburg receivership-related documents to Sharefile site.	B53	02062	MC2	0.10	\$59.85
11/03/2021	Draft checklist of projects, deadlines, and staffing [0.9]; email with team re: same [0.1].	B53	26059	ER	1.00	\$274.50
11/03/2021	Send Imanageshare requests for historical receivership documents to A. Jen [0.1]; email to A. Jen re: same [0.1].	B53	26059	ER	0.20	\$54.90
11/03/2021	Review and receipt of historical receivership files from Robb Evans.	B53	26059	ER	0.70	\$192.15
11/03/2021	Review emails re historical receivership documentation transition.	B53	30046	NS1	0.10	\$59.85
11/04/2021	Email with G. Caris and A. Jen regarding Imanageshare requests for historical receivership documentation update [0.1]; confer with M. Conlan and team re: same [0.1].	B53	26059	ER	0.20	\$54.90
11/04/2021	Review and organize files from Robb Evans [0.4]; confer and email with M. Conlan re: same [0.1].	B53	26059	ER	0.50	\$137.25
11/04/2021	Update key contacts per G. Caris email.	B53	26059	ER	0.10	\$27.45
11/04/2021	Email and confer with team re: historical receivership documentation to be provided by Barnes & Thornburg.	B53	26059	ER	0.20	\$54.90
11/04/2021	Update case checklist to include comparison of Asset List with 3rd Quarterly Report [0.1]; email and confer with team re: same [0.1].	B53	26059	ER	0.20	\$54.90
11/04/2021	Review/analyze all three Quarterly Reports (0.8); outline open issues for discussion with Barnes & Thornburg (0.8).	B53	30046	NS1	1.60	\$957.60
11/04/2021	Confer with M. Conlan re case checklist.	B53	30046	NS1	0.20	\$119.70
11/04/2021	Attend to emails re call with Barnes & Thornburg.	B53	30046	NS1	0.10	\$59.85
11/05/2021	Review and organize files from Robb Evans [3.0]; confer and email with team re: same [0.2].	B53	26059	ER	3.20	\$878.40
11/05/2021	Follow-up call with Gary Caris, Mark Conlan and Gil Miller regarding case status.	B53	30046	NS1	0.70	\$418.95
11/08/2021	Send upload request and share to G. Caris for providing historical receivership documents from Barnes & Thornburg [0.2]; email with G. Caris re: same [0.1].	B53	26059	ER	0.30	\$82.35
11/08/2021	Review and organize files from Robb Evans.	B53	26059	ER	0.70	\$192.15
11/08/2021	Exchange emails with M. Conlan re agenda for SEC call.	B53	30046	NS1	0.10	\$59.85
11/09/2021	Review and receipt of Barnes & Thornburg historical receivership files [0.2]; review document population to strategize document handling [0.3]; detailed email with team re: same [0.3].	B53	26059	ER	0.80	\$219.60
11/09/2021	Review and receipt of Quickbooks files from Robb Evans; share with G. Miller; email with A. Jen and G. Miller re: same [0.1].	B53	26059	ER	0.10	\$27.45
11/09/2021	Exchange numerous emails with M. Conlan (Receiver) on open receivership issues.	B53	30046	NS1	0.20	\$119.70
11/09/2021	Review emails from Anita Jen of Robb Evans re historical receivership documentation uploads.	B53	30046	NS1	0.10	\$59.85
11/10/2021	Email with team re: case checklist.	B53	26059	ER	0.10	\$27.45
11/10/2021	Share numerous receivership files with Rocky Mountain Advisory personnel, G. Miller and J. Curtis.	B53	26059	ER	0.70	\$192.15
11/10/2021	Email with A. Jen re: logistics for forwarding hard copy of historical receivership documentation [0.1]; confer with M. Conlan re: same [0.1].	B53	26059	ER	0.20	\$54.90
11/10/2021	Call with SEC counsel on case status and next steps.	B53	30046	NS1	1.20	\$718.20
11/10/2021	Confer with M. Conlan re agenda for call with the SEC (0.1); draft email to D. Barney re same (0.2).	B53	30046	NS1	0.30	\$179.55
11/12/2021	Briefly review asset-related deposition testimony [0.1]; confer with team re: logistics for review of testimony and documents [0.1]; continue review and organization of Robb Evans files from SEC [0.6].	B53	26059	ER	0.80	\$219.60
11/15/2021	Continue review and organization of Robb Evans files from SEC [1.5]; email and confer with team re: database logistics [0.2].	B53	26059	ER	1.70	\$466.65
11/15/2021	Confer with C. McMullan re research on statute of limitations issue.	B53	30046	NS1	0.30	\$179.55
11/15/2021	Confer with M. Conlan re pending matter before the Magistrate Judge on charities (0.1); review local rules on contact with Chambers (0.1); draft email to M. Conlan re same (0.1).	B53	30046	NS1	0.30	\$179.55
11/16/2021	Review, receipt and organization of Barnes & Thornburg historical ECF files [1.7]; detailed email with team re: same [0.1].	B53	26059	ER	1.80	\$494.10
11/16/2021	Place call to US attorney on forfeiture matters.	B53	30046	NS1	0.20	\$119.70
11/16/2021	Confer with M. Conlan on next steps in the case.	B53	30046	NS1	0.30	\$179.55

Gibbons P.C.

Time Detail

Run Date: 2/23/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
11/17/2021	Continue organization of Barnes & Thornburg historical ECF files [1.5]; email with team re: key docs folder [0.1].	B53	26059	ER	1.60	\$439.20
11/17/2021	Review and edit case checklist (0.2); confer with E. Rosen re same (0.1).	B53	30046	NS1	0.30	\$179.55
11/18/2021	Attend to email from Anita Jen regarding services provided by CoServ.	B53	30046	NS1	0.10	\$59.85
11/18/2021	Review email from E. Rosen re historical receivership documentation received from Barnes & Thornburg.	B53	30046	NS1	0.10	\$59.85
11/19/2021	Inventory database and other documents provided by predecessor receiver [0.4]; email with team re: same [0.1].	B53	26059	ER	0.50	\$137.25
11/22/2021	Telephone call with N. Songonuga re: recording appointment order on real property.	B53	02062	MC2	0.30	\$179.55
11/22/2021	Confer with team re: database production and additional historical receivership files from Robb Evans and the SEC.	B53	26059	ER	0.10	\$27.45
11/22/2021	Confer with team re: case checklist (0.2); update case checklist to reflect recent developments (0.1); email with team re: same (0.2).	B53	26059	ER	0.50	\$137.25
11/22/2021	Working session with E. Rosen re case checklist and next steps.	B53	30046	NS1	0.20	\$119.70
11/23/2021	Docket key deadlines per case checklist.	B53	26059	ER	0.60	\$164.70
11/29/2021	Call with US Attorneys regarding case status and jurisdiction.	B53	30046	NS1	0.40	\$239.40
11/29/2021	Confer with M. Conlan re discussion with US Attorneys (0.1); draft email to M. Conlan and D. Barney re same (0.2).	B53	30046	NS1	0.30	\$179.55
11/30/2021	Research Azimuth Trust in connection with 1197 Lloyd property [0.4]; email and confer with team re: same [0.4].	B53	26059	ER	0.80	\$219.60
11/30/2021	Working session with D. Crapo on case status and next steps.	B53	30046	NS1	0.50	\$299.25
12/03/2021	Review calculations for payment of Robb Evans, Barnes Thornburg, and Engelman Berger [0.1]; email and confer with team re: same [0.1].	B53	26059	ER	0.20	\$54.90
12/08/2021	Review and bookmark 3rd Quarterly Report (0.1); update docket and distribute to team (0.1).	B53	26059	ER	0.20	\$54.90
12/16/2021	Review case checklist updates [0.1]; update selected case checklist items to reflect recent developments [0.1]; email with team re: same [0.1].	B53	26059	ER	0.30	\$82.35
12/22/2021	Review docket in Mediatrix case.	B53	02062	MC2	0.20	\$119.70
12/28/2021	Draft entry of appearance for D. Crapo [0.5]; email with team re: same [0.1].	B53	26059	ER	0.60	\$164.70
12/29/2021	Prepare D. Crapo Entry of Appearance for electronic filing; file and serve same [0.1]; review and receipt of as filed version of same; email with team re: same; coordinate mail service of same [0.1].	B53	26059	ER	0.20	\$54.90
12/30/2021	Download broker dealer production from SEC; circulate same to E. Rosen and D. Crapo.	B53	02062	MC2	0.10	\$59.85
12/30/2021	Download SEC Production, (0.2); telephone call with E. Rosen re: same (0.1).	B53	02062	MC2	0.30	\$179.55
12/31/2021	Email with team re: notices regarding M. Conlan Entry of Appearance.	B53	26059	ER	0.10	\$27.45
12/31/2021	Update case checklist to reflect recent developments.	B53	26059	ER	0.20	\$54.90
	Sub-Total For Task:	B53	Case Administration		56.40	\$21,247.65
10/30/2021	Draft redlined version of Stretto agreement reflecting P. Frazza comments [0.4]; email with team re: same [0.1].	B52	26059	ER	0.50	\$137.25
11/01/2021	Review edits to Stretto software agreement (0.1); transmit same to M. Wisbey at Stretto (0.1).	B52	02062	MC2	0.20	\$119.70
11/01/2021	Further revisions to Stretto software agreement (0.2); e-mails with M. Wisbey re: same (0.1).	B52	02062	MC2	0.30	\$179.55
11/01/2021	Emails with Mark Conlan (0.2); review software license agreement with Stretto (0.2); preparation of memo (from October 30, 2021) (0.4).	B52	00272	PJF	0.80	\$478.80
11/08/2021	Complete EastWest form for receivership account.	B52	26059	ER	0.30	\$82.35
11/09/2021	Review and receipt of fully executed EastWest Services Agreement.	B52	26059	ER	0.10	\$27.45
11/11/2021	Review and receipt of bank statements from Robb Evans files [0.2]; email with team re: same [0.1]; notate RMA file re: receipt of complete Robb Evans files [0.1].	B52	26059	ER	0.40	\$109.80
11/18/2021	Review emails from Gary Caris and M. Conlan re insurance on properties.	B52	30046	NS1	0.10	\$59.85
11/19/2021	Continue review and receipt of recent documents regarding insurance invoices [0.1]; email and confer with team re: same [0.1].	B52	26059	ER	0.20	\$54.90
11/23/2021	Email with team re: invoices needing attention [0.1]; confer with CoServe regarding transferring account to successor receiver [0.3]; draft detailed email to CoServe regarding transferring account [0.5]; email and confer with team re: same [0.1].	B52	26059	ER	1.10	\$301.95
12/09/2021	Confer with and e-mails to/from M.E. Conlan (0.1); review e-mail from Youngs' counsel, Tracey Ashmore, re: insurance on Youngs' residence (0.1).	B52	02548	DC	0.20	\$119.70
12/10/2021	E-mails to/from insurance broker, John Pinto, the Youngs' counsel and to M. Conlan re: insurance on Young residence.	B52	02548	DC	0.30	\$179.55

Gibbons P.C.

Time Detail

Run Date: 2/23/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
12/13/2021	Review e-mail from insurance broker John Pinto re: insurance of Young residence (0.1); e-mail to/from M. Conlan re: same and re: Lloyd Road property (0.1).	B52	02548	DC	0.20	\$119.70
12/14/2021	Review and receipt of EastWest Bank statement; email with team re: same.	B52	26059	ER	0.10	\$27.45
12/15/2021	Attend to e-mails with J. DePinto, T. Ashmore, J. Wolak and D. Crapo re: insurance of Young residence.	B52	02062	MC2	0.10	\$59.85
	Sub-Total For Task:	B52			4.90	\$2,057.85
	Business Operations					
10/25/2021	Research statute of limitations for fraudulent conveyance claims in Colorado.	B50	30046	NS1	0.20	\$119.70
10/26/2021	E-mails with B. Theisen and N. Songonuga re: response to Young Motion to Terminate Pre-judgment Collection Activities.	B50	02062	MC2	0.20	\$119.70
10/26/2021	Review/analyze the Young defendants' motion to terminate the receiver's pre-judgment efforts to collect donations made to charities, the Receiver's response to the Motion, and the SEC's opposition to the Motion (1.0); draft email summary and recommendations of next steps to M. Conlan (Receiver) (0.4).	B50	30046	NS1	1.40	\$837.90
10/27/2021	Review and receipt of Order Releasing Assets and Motions regarding motions to unfreeze assets filed with inventory lists.	B50	26059	ER	0.90	\$247.05
10/28/2021	E-mails with N. Songonuga re: Young reply in support of motion to terminate pre-judgment collection efforts.	B50	02062	MC2	0.10	\$59.85
10/28/2021	Review the Youngs' Reply re charities; draft email to M. Conlan re same.	B50	30046	NS1	0.20	\$119.70
10/29/2021	Review Young's Reply Brief in Support of Motion Terminating Receiver's Pre-judgment collection activities.	B50	02062	MC2	0.20	\$119.70
11/01/2021	Telephone call with N. Songonuga re: preparation for call with counsel for M. Young.	B50	02062	MC2	0.10	\$59.85
11/01/2021	Call with Receiver and Tracy Ashmore (Youngs' counsel) re: case background.	B50	30046	NS1	1.10	\$658.35
11/04/2021	Exchange emails with Gary Caris of Barnes & Thornburg re transfer made to Stewart's attorney.	B50	30046	NS1	0.20	\$119.70
11/04/2021	Exchange several emails with Vivian Drohan re retainer received from receivership assets.	B50	30046	NS1	0.20	\$119.70
11/04/2021	Working session with M. Conlan regarding discussion with Vivian Drohan regarding retainer and Bahamas assets and next steps.	B50	30046	NS1	1.00	\$598.50
11/04/2021	Confer with Vivian Drohan, M. Stewart's counsel, regarding receivership assets.	B50	30046	NS1	0.50	\$299.25
11/05/2021	Call with Gary Caris regarding transition items, including charities and brokers.	B50	30046	NS1	1.00	\$598.50
11/08/2021	Review and respond to e-mail from N. Songonuga re: agenda for SEC call.	B50	02062	MC2	0.30	\$179.55
11/08/2021	Draft email summary to M. Conlan outlining list of potential estate causes of action and exchange emails with M. Conlan re same.	B50	30046	NS1	0.60	\$359.10
11/09/2021	Attend to E-mails with G. Caris re: YMan Investments; attend to follow-up e-mail with N. Songonuga.	B50	02062	MC2	0.10	\$59.85
11/09/2021	Telephone call with class action counsel re: potential contingency claims.	B50	02062	MC2	0.40	\$239.40
11/09/2021	Attend to follow up e-mails with class action counsel re: potential claims.	B50	02062	MC2	0.20	\$119.70
11/09/2021	Review email from Gary Caris re YM Investments, LLC (0.1); place call to rep Byron Brown re fraudulent transfer (0.1).	B50	30046	NS1	0.20	\$119.70
11/09/2021	Review certain documents received from Barnes & Thornburg on potential claims belonging to the estate; update/draft agenda for call with SEC.	B50	30046	NS1	1.40	\$837.90
11/09/2021	Attend to emails from E. Rosen re additional documents on charities received from Barnes & Thornburg (0.1); review documents re: same (0.2).	B50	30046	NS1	0.30	\$179.55
11/10/2021	Review class complaint against Equiti.	B50	02062	MC2	1.10	\$658.35
11/10/2021	Draft follow-up e-mail to N. Songonuga re: preparation of tolling agreements.	B50	02062	MC2	0.20	\$119.70
11/10/2021	Review document population to identify investor data for attorney review [0.3]; detailed email with team re: same [0.2].	B50	26059	ER	0.50	\$137.25
11/12/2021	Telephone call with E. Rosen re: review of document production.	B50	02062	MC2	0.10	\$59.85
11/15/2021	Telephone call with N. Songonuga re: tolling agreements and next steps.	B50	02062	MC2	0.40	\$239.40
11/15/2021	Review appointment order, draft follow up e-mail to E. Rosen and N. Songonuga re: notice of substitute appointment, recording of appointment order and status of 1197 Lloyd's Road Property.	B50	02062	MC2	0.50	\$299.25
11/15/2021	Research re: tolling of statute of limitations.	B50	30581	CDM	2.50	\$821.25
11/15/2021	Confer and email with team re: possible responsive filing to charity motion.	B50	26059	ER	0.20	\$54.90
11/15/2021	Call with Bryon Brown rep for YM Investments regarding claims relating to commissions.	B50	30046	NS1	0.40	\$239.40
11/15/2021	Exchange emails with M. Conlan re Ukrainian Apartment.	B50	30046	NS1	0.10	\$59.85
11/15/2021	Exchange emails with M. Conlan re filing of appointment order with registry of deeds and exchange emails with Gary Caris re same.	B50	30046	NS1	0.30	\$179.55
11/15/2021	Review email from rep for Mary Mother of God Mission Society regarding in ability to repay.	B50	30046	NS1	0.10	\$59.85

Gibbons P.C.

Time Detail

Run Date: 2/23/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
11/16/2021	Draft email to AUSA Tonya Andrews re Bahamas properties.	B50	30046	NS1	0.10	\$59.85
11/16/2021	Draft form tolling agreements/letters for Broker Dealers and Charities.	B50	30046	NS1	3.10	\$1,855.35
11/17/2021	Confer with team re: recording receivership appointment for real property [0.1]; research on Ukraine property; detailed email with team re: same [0.1]; email with team re: criminal deadlines and monitor docket [0.1].	B50	26059	ER	0.30	\$82.35
11/17/2021	Review and respond to emails from Gary Caris and Anita Jen regarding services being provided at the Texas location.	B50	30046	NS1	0.20	\$119.70
11/17/2021	Review documents from prior receiver's firm on requests sent to Broker Dealers.	B50	30046	NS1	0.40	\$239.40
11/18/2021	Conference with M. Conlan and V. Drohan re: Bahamian assets.	B50	02518	DEB	0.30	\$179.55
11/18/2021	Review and revise draft forms of tolling agreement.	B50	02062	MC2	1.10	\$658.35
11/18/2021	Continue review and organization of Barnes Thornburg ECF files [1.2]; review and receipt of recent documents regarding charities, net winners and tolling agreements [0.2]; email with team re: same [0.1].	B50	26059	ER	1.50	\$411.75
11/18/2021	Review email from Young's counsel Tracy Ashmore re ownership of Florida property.	B50	30046	NS1	0.10	\$59.85
11/19/2021	Revise Charity and Broker Dealer tolling stips re: edits from M. Conlan. Began drafting tolling agreements for Asset Freeze Violators, Equiti entities, Net Winners	B50	30046	NS1	4.30	\$2,573.55
11/19/2021	Review and respond to email from M. Conlan re status of Bahamas boat.	B50	30046	NS1	0.10	\$59.85
11/22/2021	Place follow-up call to US Attorney re Bahamas properties (0.1) exchange numerous emails with attorney W. Gillispie re meeting to discuss same (0.2).	B50	30046	NS1	0.30	\$179.55
11/22/2021	Finalized draft tolling stipulations (0.3); and draft email to M. Conlan re same (0.1).	B50	30046	NS1	0.40	\$239.40
11/23/2021	Review and receipt of recent correspondence regarding tolling agreements and demand letters.	B50	26059	ER	0.10	\$27.45
11/29/2021	Attend to e-mails with E. Rosen re: title work on 1197 Lloyd's Road property.	B50	02062	MC2	0.10	\$59.85
11/29/2021	Telephone calls with N. Songonuga re: 1197 Lloyd's Road, tolling agreements and summary of call with AUSA Denver re: liquidation of foreign assets.	B50	02062	MC2	0.20	\$119.70
11/29/2021	Review Title Company productions to identify 1197 Lloyd's title work [0.4]; create share folder for same [0.1]; email with G. Caris and A. Jen re: same [0.1]; email with team re: same [0.1].	B50	26059	ER	0.70	\$192.15
11/29/2021	Follow-up emails with paralegal E. Pearson on title ownership of Texas property.	B50	30046	NS1	0.10	\$59.85
11/29/2021	Exchange numerous emails with M. Conlan re 1197 Texas Property and review documents re same.	B50	30046	NS1	0.40	\$239.40
11/29/2021	Continue review of documents received from prior receiver's counsel on receivership assets.	B50	30046	NS1	0.70	\$418.95
11/30/2021	Review title report for 1197 Lloyd's Road (0.1); e-mails with N. Songonuga and E. Rosen re: same; telephone call with E. Rosen re: same (0.1).	B50	02062	MC2	0.20	\$119.70
11/30/2021	Confer with N. Songonuga re: Tolling Agreements and other open issues.	B50	02548	DC	0.50	\$299.25
11/30/2021	Review listing agreement for 1197 Lloyds Road, Denton, TX.	B50	02548	DC	0.50	\$299.25
11/30/2021	E-mails to/from M.B. Conlan re: listing agreement.	B50	02548	DC	0.30	\$179.55
11/30/2021	Review documents and information re: property.	B50	02548	DC	0.30	\$179.55
11/30/2021	Review and receipt of 1197 Lloyd's title work from A. Jen [0.1]; email with team re: same [0.1].	B50	26059	ER	0.20	\$54.90
11/30/2021	Review emails re listing agreement for the sale of 1197 Lloyds Rd property	B50	30046	NS1	0.10	\$59.85
11/30/2021	Draft email to Gary Caris re 1197 Lloyds property.	B50	30046	NS1	0.10	\$59.85
11/30/2021	Review title documents, examiner's reports and other documents on 1197 Lloyds property and exchange numerous emails with M. Conlan re same.	B50	30046	NS1	0.70	\$418.95
11/30/2021	Exchange several emails with D. Crapo on receivership assets.	B50	30046	NS1	0.30	\$179.55
12/01/2021	Review original Receiver's Fourth Report.	B50	02548	DC	0.50	\$299.25
12/01/2021	Review broker dealer info (0.2); follow-up with D. Crapo on tolling stipulations (0.1).	B50	30046	NS1	0.30	\$179.55
12/02/2021	Review and revise tolling agreement templates.	B50	02062	MC2	1.20	\$718.20
12/02/2021	Telephone call with N. Songonuga re: tolling agreements.	B50	02062	MC2	0.10	\$59.85
12/02/2021	E-mails to/from and confer with N.M. Songonuga re: Receivership claims.	B50	02548	DC	0.20	\$119.70
12/02/2021	Review order on original Receiver's Fourth Report.	B50	02548	DC	0.10	\$59.85
12/02/2021	Review asset freeze documentation and sale orders [1.2]; revise asset list to reflect comparison with Motions to Unfreeze asset lists and Sale Orders [1.1]; confer and email with team re: same [0.1].	B50	26059	ER	2.40	\$658.80
12/02/2021	Attend to emails re net winners (0.1); confer with E. Rosen re file on same (0.1); review same (0.1).	B50	30046	NS1	0.30	\$179.55
12/02/2021	Review and respond to emails from D. Crapo on tolling stipulations.	B50	30046	NS1	0.10	\$59.85

Gibbons P.C.

Time Detail

Run Date: 2/23/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
12/03/2021	Return telephone call from counsel for broker (0.1); initial review of list of charities and e-mail from E. Rosen re: same (0.2); initial review of net winner information and e-mail from E. Rosen re: same (0.2); e-mails to/from proposed broker on the 1197 Lloyd Road property re: listing agreement (0.3); review docket and pleadings (0.3); e-mail to investor re: claims and claims resolution procedures (0.2).	B50	02548	DC	1.30	\$778.05
12/03/2021	E-mails to/from and confer with N.M. Songonuga re: Receivership claims.	B50	02548	DC	0.20	\$119.70
12/03/2021	Review and verify charity clawback demand collection data [0.9]; combine to single spreadsheet [0.8]; create merge letter [0.3]; confer and email with team re: same [0.2].	B50	26059	ER	2.20	\$603.90
12/03/2021	Review and respond to email from Gary Caris re broker dealer defendant.	B50	30046	NS1	0.10	\$59.85
12/03/2021	Confer with E. Rosen re status on tolling letters and next steps re same.	B50	30046	NS1	0.20	\$119.70
12/06/2021	Telephone call with E. Rosen re: net winners' list.	B50	02062	MC2	0.10	\$59.85
12/06/2021	E-mails to/from E. Rosen re: demands to charities.	B50	02548	DC	0.10	\$59.85
12/06/2021	Review background material for next steps.	B50	02548	DC	0.50	\$299.25
12/06/2021	Confer with counsel for a broker re: status of case.	B50	02548	DC	0.20	\$119.70
12/06/2021	Confer and email with team re: demand letters.	B50	26059	ER	0.10	\$27.45
12/06/2021	Update list for charity demand letters per attorney request.	B50	26059	ER	0.10	\$27.45
12/07/2021	Attend to e-mails with E. Rosen and J. Curtis re: net winner analysis (0.3); telephone call with E. Rosen re: same (0.1).	B50	02062	MC2	0.40	\$239.40
12/07/2021	Conference with D. Crapo re: tolling agreements, demand letters and action items.	B50	02062	MC2	1.00	\$598.50
12/07/2021	Confer with E. Rosen re: demands to charities.	B50	02548	DC	0.10	\$59.85
12/07/2021	Review e-mails from N.M. Songonuga and M.E. Conlan and financial advisors re: net winners analysis.	B50	02548	DC	0.40	\$239.40
12/07/2021	Confer with M.E. Conlan re: strategy and next steps.	B50	02548	DC	1.00	\$598.50
12/07/2021	Review of pleadings addressing potential assets for liquidation and claims to be pursued.	B50	02548	DC	0.80	\$478.80
12/07/2021	Further update list for charity demand letters per attorney request [0.2]; draft merge letter and merge list [0.6]; confer and email with team re: same [0.2].	B50	26059	ER	1.00	\$274.50
12/07/2021	Email and confer with M. Conlan re: Grant Thornton analysis of gains and losses.	B50	26059	ER	0.20	\$54.90
12/07/2021	Review documents regarding investor payments and working session with M. Conlan on bank schedules and payments to Broker Dealers.	B50	30046	NS1	1.20	\$718.20
12/08/2021	E-mails to/from and confer with E. Rosen re: demands to charities.	B50	02548	DC	0.20	\$119.70
12/08/2021	Review and respond to e-mail from M.E. Conlan re: meeting with SEC.	B50	02548	DC	0.30	\$179.55
12/08/2021	Review broker dealer lists for tolling agreement letters; draft merge list [0.9]; research brokers and addresses [0.8]; confer and detailed email with team re: same [0.2].	B50	26059	ER	1.90	\$521.55
12/08/2021	Review charity letters (0.1); email with D. Crapo and team re: same (0.1).	B50	26059	ER	0.20	\$54.90
12/09/2021	E-mails to/from Vivian Rivera Drohan, counsel to the Sewells and the Stewarts, for a meeting.	B50	02548	DC	0.20	\$119.70
12/09/2021	Participate in telephone conference with Vivian Riviera Drohan re: assets.	B50	02548	DC	0.60	\$359.10
12/09/2021	Follow up conference with M.E. Conlan re: assets,	B50	02548	DC	0.10	\$59.85
12/09/2021	Participate in conference call with SEC re: information necessary for asset recovery.	B50	02548	DC	0.50	\$299.25
12/09/2021	Draft merge list for Asset Freeze Violator demand letters.	B50	26059	ER	0.80	\$219.60
12/10/2021	E-mail to Mediatix team at SEC re: broker/dealers.	B50	02548	DC	0.10	\$59.85
12/10/2021	Update broker list [0.1]; modify list to request missing addresses from SEC [0.3]; email with D. Crapo and team re: same [0.1].	B50	26059	ER	0.50	\$137.25
12/13/2021	Review and respond to e-mail from J. Curtis re: net winner analysis.	B50	02062	MC2	0.10	\$59.85
12/13/2021	Review demand/tolling letters to Charities.	B50	02548	DC	0.60	\$359.10
12/13/2021	E-mail to E. Rosen re: tolling letters.	B50	02548	DC	0.20	\$119.70
12/13/2021	Draft revisions to proposed listing agreement for the 1197 Lloyd's Road property in Denton.	B50	02548	DC	0.30	\$179.55
12/13/2021	E-mails to/from prospective broker and to M.E. Conlan re listing agreement.	B50	02548	DC	0.30	\$179.55
12/14/2021	Confer with M.E. Conlan re: watercraft.	B50	02548	DC	0.10	\$59.85
12/14/2021	E-mails to/from Realtor James Hankinson re: listing agreement for 1197 Lloyd Rd., Denton, TX property.	B50	02548	DC	0.10	\$59.85
12/14/2021	Research and update list of asset violators for letters.	B50	26059	ER	0.20	\$54.90
12/14/2021	Proof and revise 14 letters to charities [0.7]; email and confer with team re: same [0.1].	B50	26059	ER	0.80	\$219.60

Gibbons P.C.Time Detail
Run Date: 2/23/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
12/15/2021	Review and revise dockets for 19-cv-2594, 19-cv-3310 and 21-cr-34 (0.3); review and revise receivership checklist (0.4); circulate same to D. Crapo and E. Rosen (0.1).	B50	02062	MC2	0.80	\$478.80
12/15/2021	Review SEC Motion to Approve Equiti Settlement Transfer (0.1); e-mails with G. Miller, R. Ereksion and E. Rosen re: same (0.1).	B50	02062	MC2	0.20	\$119.70
12/15/2021	Research and update list of asset violators for letters [0.4]; detailed email with team re: same [0.1].	B50	26059	ER	0.50	\$137.25
12/17/2021	Review and respond to e-mail from J. Curtis re: net winner analysis.	B50	02062	MC2	0.10	\$59.85
12/20/2021	Prepare for and participate in conference call with J. Curtis and D. Crapo re: net winner analysis.	B50	02062	MC2	0.70	\$418.95
12/20/2021	Review and analyze spreadsheet of net winners from Rocky Mountain Advisory.	B50	02062	MC2	0.60	\$359.10
12/20/2021	Participate in conference call with M. Conlan and financial advisor, John Curtis, re: demands to "net winners (0.4);" e-mail to M Conlan re: same (0.1).	B50	02548	DC	0.50	\$299.25
12/21/2021	Review listing agreement for 1196 Lloyd Rd. property and e-mails to/from listing agent re: same.	B50	02548	DC	0.20	\$119.70
12/21/2021	Review demand/tolling letters to freeze order violators and e-mails to/from E. Rosen re: same.	B50	02548	DC	0.20	\$119.70
12/22/2021	Legal research on sale motion for 1197 Lloyds Road property, emails with D. Crapo re: same.	B50	02062	MC2	0.20	\$119.70
12/22/2021	Confer with Paige Palmer, real estate agent for Josh Flynn, re: Lloyds Road property.	B50	02548	DC	0.20	\$119.70
12/22/2021	E-mails to/from listing agent re: sale of Lloyd's Road property.	B50	02548	DC	0.20	\$119.70
12/22/2021	Review and respond to e-mails from and confer with M.B. Conlan re: sale of Lloyds Road property.	B50	02548	DC	0.10	\$59.85
12/23/2021	Review e-mails with counsel for Archdiocese of Philadelphia and D. Crapo re: tolling agreement.	B50	02062	MC2	0.10	\$59.85
12/23/2021	Review and analyze Purchase Agreement for 1197 Lloyds Road property, draft follow-up e-mail to D. Crapo with edits to same (split).	B50	02062	MC2	0.40	\$239.40
12/23/2021	E-mails to/from Robert Welch, counsel for Archdiocese of Philadelphia, St. Charles Borromeo Seminary, and E. Rosen re: tolling letter.	B50	02548	DC	0.30	\$179.55
12/23/2021	Confer with Jeffrey Keith of Gardian re: tolling letter.	B50	02548	DC	0.20	\$119.70
12/27/2021	E-mails to/from E. Rosen re: procedural issues.	B50	02548	DC	0.10	\$59.85
12/28/2021	E-mails to/from E. Rosen re: procedural issues and demand letter to a charity.	B50	02548	DC	0.20	\$119.70
12/28/2021	Review and receipt of RMA drafts and information regarding Net Winners.	B50	26059	ER	0.10	\$27.45
12/28/2021	Email with Knowledge Management re: verifying asset freeze violator addresses.	B50	26059	ER	0.10	\$27.45
12/28/2021	Draft revised tolling stipulation letter to Archdiocese of Philadelphia and St. Charles Borromeo Seminary [0.3]; email with team re: same [0.1].	B50	26059	ER	0.40	\$109.80
12/29/2021	Attend to e-mails with D. Crapo and E. Rosen re: tolling agreements.	B50	02062	MC2	0.20	\$119.70
12/29/2021	E-mails with E. Rosen re: tolling letters for asset violators.	B50	02062	MC2	0.10	\$59.85
12/29/2021	Review Stewart Notice of and Repentance of Sins, attend to e-mails with D. Crapo, E. Rosen and G. Miller re: same.	B50	02062	MC2	0.20	\$119.70
12/29/2021	E-mails to/from E. Rosen and review e-mails from M.B. Conlan re: tolling stipulations.	B50	02548	DC	0.30	\$179.55
12/29/2021	Confer with M.B. Conlan re: next steps.	B50	02548	DC	0.30	\$179.55
12/29/2021	Confer with counsel for investor about status of matter.	B50	02548	DC	0.10	\$59.85
12/29/2021	Prepare letter to Archdiocese of Philadelphia and St. Charles Borromeo Seminary for email [0.1]; email opposing counsel re: same [0.1].	B50	26059	ER	0.20	\$54.90
12/29/2021	Review and receipt of various reports regarding verification of Asset Freeze Violators' addresses [0.1]; review reports regarding verification of addresses and update merge data list accordingly [0.9]; confer and email with team re: same [0.3].	B50	26059	ER	1.30	\$356.85
12/29/2021	Review all tolling agreement letters to confirm "alleged" language included [0.1]; detailed email with team re: Asset Violator letter language [0.1]; confer and email with team re: "alleged" language [0.1].	B50	26059	ER	0.30	\$82.35
12/30/2021	Review and revise tolling letter for asset freeze violators, e-mails with E. Rosen re: same.	B50	02062	MC2	0.40	\$239.40
12/30/2021	E-mails to/from E. Rosen (0.1); review e-mails from M. Conlan re: tolling stipulations (0.2).	B50	02548	DC	0.30	\$179.55
12/30/2021	Review and receipt of Guardian Group signed charity tolling agreement [0.1]; update chart re: same [0.2]; email with team re: same [0.1].	B50	26059	ER	0.40	\$109.80
12/30/2021	Review and receipt of additional reports regarding verification of Asset Freeze Violator Victoria Stewart address [0.2]; review reports regarding verification of addresses and update merge data list accordingly [0.4]; revise Asset Freeze Violator Tolling Agreement letter [0.2]; email with team re: same [0.2].	B50	26059	ER	1.00	\$274.50
12/31/2021	Finalize Asset Freeze Violator tolling agreement letters [0.7]; email and confer with team re: same [0.3].	B50	26059	ER	1.00	\$274.50
12/31/2021	Review SEC document population [0.2]; detailed email with team re: SEC document review [0.2].	B50	26059	ER	0.40	\$109.80

Gibbons P.C.

Time Detail
Run Date: 2/23/2022

Client/Matter: 117199	Mark Conlan
106202	Counsel to Mark Conlan in his capacity as SEC Receiver

Sub-Total For Task:	B50	Asset Analysis and Recovery	72.30	\$35,954.55
Total For Matter:	106202	Counsel to Mark Conlan in his capacity a	170.20	\$75,531.60
Totals For Client:			170.20	\$75,531.60

Gibbons P.C.

Time Summary
Run Date: 2/23/2022

Client/Matter: 117199 **Mark Conlan**

Atty Code	Initials	Attorney Name	Position	Hours	Avg Rate	Value
02518	DEB	Barney, Dale E.	Director	4.80	\$598.50	\$2,872.80
02062	MC2	Conlan, Mark	Director	25.50	\$598.50	\$15,261.75
00272	PJF	Frazza, Peter J.	Director	0.80	\$598.50	\$478.80
20967	JAH	Hradil, Jennifer A.	Director	0.50	\$598.50	\$299.25
30046	NS1	Songonuga, Natasha	Director	43.10	\$598.50	\$25,795.35
02548	DC	Crapo, David	Counsel	14.50	\$598.50	\$8,678.25
30577	AJM1	Marino, Andrew J.	Associate	3.60	\$328.50	\$1,182.60
30581	CDM	McMullan, Conor D.	Associate	2.50	\$328.50	\$821.25
26059	ER	Rosen, Ellen	Case Manager	68.70	\$274.50	\$18,858.15
89266	DW	Whitford, Diane	Case Manager	0.90	\$207.00	\$186.30
26048	NM3	Mitchell, Neal	ParaLegal	5.30	\$207.00	\$1,097.10
Totals:				170.20		\$75,531.60

Gibbons P.C.

Fee Application
Run Date: 2/23/2022

Client/Matter: 117199 Mark Conlan

Task/ Code	Description Of Services	Hours	Value
B70	Tax Issues	0.20	\$87.30
B62	Litigation	20.90	\$9,791.10
B56	Employment Applications	15.50	\$6,393.15
B53	Case Administration	56.40	\$21,247.65
B52	Business Operations	4.90	\$2,057.85
B50	Asset Analysis and Recovery	72.30	\$35,954.55
Totals:		170.20	\$75,531.60

Gibbons P.C.Fee Application
Run Date: 2/23/2022

Client/Matter: 117199 Mark Conlan

Task Code	Description Of Services	Hours	Value
B70	<u>Tax Issues</u>		
	26059 Rosen, Ellen	0.10	\$27.45
	30046 Songonuga, Natasha	0.10	\$59.85
B70	Tax Issues	0.20	\$87.30
B62	<u>Litigation</u>		
	02518 Barney, Dale E.	3.00	\$1,795.50
	02062 Conlan, Mark	7.90	\$4,728.15
	20967 Hradil, Jennifer A.	0.50	\$299.25
	30577 Marino, Andrew J.	3.60	\$1,182.60
	26059 Rosen, Ellen	4.30	\$1,180.35
	30046 Songonuga, Natasha	0.70	\$418.95
	89266 Whitford, Diane	0.90	\$186.30
B62	Litigation	20.90	\$9,791.10
B56	<u>Employment Applications</u>		
	02518 Barney, Dale E.	0.80	\$478.80
	02062 Conlan, Mark	2.10	\$1,256.85
	26059 Rosen, Ellen	8.90	\$2,443.05
	30046 Songonuga, Natasha	3.70	\$2,214.45
B56	Employment Applications	15.50	\$6,393.15
B53	<u>Case Administration</u>		
	02518 Barney, Dale E.	0.70	\$418.95
	02062 Conlan, Mark	2.50	\$1,496.25
	26048 Mitchell, Neal	5.30	\$1,097.10
	26059 Rosen, Ellen	32.20	\$8,838.90
	30046 Songonuga, Natasha	15.70	\$9,396.45
B53	Case Administration	56.40	\$21,247.65
B52	<u>Business Operations</u>		
	02062 Conlan, Mark	0.60	\$359.10
	02548 Crapo, David	0.70	\$418.95
	00272 Frazza, Peter J.	0.80	\$478.80
	26059 Rosen, Ellen	2.70	\$741.15
	30046 Songonuga, Natasha	0.10	\$59.85
B52	Business Operations	4.90	\$2,057.85
B50	<u>Asset Analysis and Recovery</u>		
	02518 Barney, Dale E.	0.30	\$179.55
	02062 Conlan, Mark	12.40	\$7,421.40
	02548 Crapo, David	13.80	\$8,259.30
	30581 McMullan, Conor D.	2.50	\$821.25
	26059 Rosen, Ellen	20.50	\$5,627.25
	30046 Songonuga, Natasha	22.80	\$13,645.80
B50	Asset Analysis and Recovery	72.30	\$35,954.55
Totals:		170.20	\$75,531.60

Gibbons P.C.

Disbursement Detail

Run Date: 2/23/2022

Client/Matter:	117199	Mark Conlan
	106202	Counsel to Mark Conlan in his capacity as SEC Receiver for Mediatrix Capital Inc., et al.

Tran Date	Description Of Disbursement	Value
<u>Disbursement Type:</u> <u>Expedited Delivery Service (Federal Express)</u>		
10/26/2021	Expedited Delivery Service (Federal Express) To: FEDEX: CLERK OF THE COURT, HATO REY PR	\$57.65
10/28/2021	Expedited Delivery Service (Federal Express) To: FEDEX: CLERK OF THE COURT, PHOENIX AZ	\$60.53
10/27/2021	Expedited Delivery Service (Federal Express) To: FEDEX: Clerk of the Court, SHERMAN TX	\$52.39
10/27/2021	Expedited Delivery Service (Federal Express) To: FEDEX: Clerk of the Court, DALLAS TX	\$52.39
10/27/2021	Expedited Delivery Service (Federal Express) To: FEDEX: Clerk of the Court, FORT MYERS FL	\$52.39
	Total: Expedited Delivery Service (Federal Express)	\$275.35
<u>Disbursement Type:</u> <u>Filing and Miscellaneous Fees</u>		
10/26/2021	Filing and Miscellaneous Fees Clerk of the Court; INVOICE#: 211026NS; 10/26/2021 - Misc. Matters case opening.	\$49.00
12/28/2021	Filing and Miscellaneous Fees Lexis Nexis Invoice No.-20211231 12/31/21	\$9.03
12/28/2021	Filing and Miscellaneous Fees Lexis Nexis Invoice No.-20211231 12/31/21	\$6.87
	Total: Filing and Miscellaneous Fees	\$64.90
<u>Disbursement Type:</u> <u>Legal Research - PACER</u>		
	Total: Legal Research - PACER	\$105.00

Total Disbursements:	\$445.25
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:19-cv-02594-RM-SKC

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD, *et al.*,

Relief Defendants.

**ORDER APPROVING AND AUTHORIZING PAYMENT OF
RECEIVER’S AND PROFESSIONALS’ FEES AND COSTS
FROM OCTOBER 20, 2021 THROUGH DECEMBER 31, 2021**

Before the Court is the Motion of Receiver, Mark B. Conlan (the “Receiver”) for Order Approving and Authorizing Payment of Receiver’s and Professionals’ Fees and Costs from October 20, 2021 through December 31, 2021 [ECF No. ____] (the “First Quarterly Fee Application”). The Court having reviewed and considered the First Quarterly Fee Application and all pleadings and evidence filed in support thereof, and there being no opposition to the First Quarterly Fee Application, and good cause appearing therefore, IT IS

ORDERED that:

1. The First Quarterly Fee Application is approved in its entirety;

2. The following fees and costs incurred in the First Expense Period¹ from the date of the Appointment Order through the end of the first quarter of the Receiver's appointment, are hereby authorized to be paid from the assets in the receivership estate:

a. The Receiver's fees in the amount of \$19,215.00 plus the Receiver's costs in the amount of \$46.01 for a total of \$19,261.01; and

b. The Receiver's counsel, Gibbons P.C.'s fees of \$75,531.60 and Gibbons' costs of \$445.25 for a total of \$75,976.85; and

c. The Receiver's accountants, Rocky Mountain Advisory, LLC's, fees of \$12,078.00 and RMA's costs of \$136.61 for a total of \$12,214.61; and

d. The Original Receiver firm, Robb Evans and Associates, LLC's, fees totaling \$7,513.65 and Robb Evans' costs of \$42.00 for a total of \$7,555.65; and

e. The Original Receiver's counsel at Barnes & Thornburg LLP's, fees of \$17,988.70 and Barnes & Thornburg's costs of \$95.58 for a total of \$18,084.28.

DATED this ____ day of _____, 2022.

BY THE COURT:

RAYMOND P. MOORE
United States District Judge

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the First Quarterly Fee Application.