

**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.

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**MOTION FOR ORDER APPROVING AND AUTHORIZING PAYMENT OF  
RECEIVER'S AND PROFESSIONALS' FEES AND COSTS  
FROM JANUARY 1, 2022 THROUGH MARCH 31, 2022**

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**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 January 1, 2022 through the end of the quarter, March 31, 2022 (the "Second 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 \$4,130.00 and Receiver's costs of \$4.50 for a total of \$4,134.50 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 \$66,621.00 and Gibbons' costs of \$465.32 for a total of \$67,086.32 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 \$9,045.00 and RMA’s costs of \$224.12 for a total of \$9,269.12 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 \$515.25 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 \$717.60 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 second Quarterly Fee Application pursuant to the Receiver Order, and covers the Second Expense Period, from January 1, 2022 through March 31, 2022. 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 January 1, 2022 through March 31, 2022* [ECF No. 324] (the “Receiver’s Second 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 Receiver provided a copy of this 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 this 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 this 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 the 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**

The Receiver and his counsel continued the retention of James Hankins, CCIM of ACR Realty, Inc. to sell the 1197 Lloyds Road property. The Receiver and his counsel engaged Robert W. Snider of Lowery Property Advisors and Jason Seacrest of Pyles Whatley Corporation during the Second Expense Period to provide updated appraisals for the 1197 Lloyds Road property. In addition, the Receiver and his counsel engaged Mike Tobin of Team Tobin to provide a broker's value opinion for the same property.

#### **Asset Analysis and Recovery; Business Operations; and Case Administration**

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 as well as real estate brokers and professional appraisers in connection with issues regarding potential avoidance claims, real property assets, personal property assets, and other assets. The majority of these communications in the Second Expense Period concerned the real property assets, personal property assets, and avoidance claims.

Updated appraisals and a broker's value opinion on the 1197 Lloyds Road, Oak Point Texas property were requested during the Second Expense Period and two updated appraisals have been

received and reviewed. The Receiver and Gibbons personnel worked extensively with counsel for a title company to address a title issue regarding this property. The issue is expected to be resolved by May 15, 2022.

To provide investors and other interested parties with timely information regarding the status of the receivership, the Receiver and his team engaged a web designer to develop a receivership website during January, 2022. The website address is [www.mediatrixreceivership.com](http://www.mediatrixreceivership.com). One of the paraprofessionals of Receiver's counsel has been updating the website throughout the period to reflect significant activity in matters related to the receivership. This arrangement is significantly less expensive than paying a third-party to host the website.

### **Litigation**

In the 10<sup>th</sup> Circuit Appeals in case numbers 21-1061; 21-1075; and 21-1322; the Receiver and his counsel continued to monitor significant filings, including those regarding the January 28, 2022 *Young Appellants' Motion for Stay of Trial Court Proceedings Pending Appeal* which was denied by order of the Court of Appeals on March 9, 2022.

The Receiver and Gibbons personnel sent out tolling agreement letters to charities who had received donations from assets of the individuals and entities subject to the instant receivership and brokers who had received commission payments paid to certain brokers that had introduced investors to Mediatrix. Reminder letters were sent to the charities that had not responded to the initial letters and will be sent to the brokers who do not respond to their initial letters. To date, the Receiver has received responses from eight (8) charities, one alleged violator of the Asset Freeze Order and two brokers. The Receiver and Gibbons personnel are conducting due diligence to

locate addresses for certain so-called net-winners with respect to the Mediatrix scheme. Once those addresses are obtained, demand and tolling agreement letters will be sent to them as will be further described in an upcoming motion.

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.

### **SUMMARY OF SERVICES BY OTHER RECEIVER PROFESSIONALS**

#### **Rocky Mountain Advisory Services**

The majority of RMA's services provided in the Second Expense Period were related to Receivership operations and included but are not limited to the following: preparation of Quarterly Report for the 4th Quarter of 2021; communications with the Receiver and his counsel at Gibbons and with SEC personnel; review and verification of investor lists and contact information; preparation of payments to vendors; forensic investigation; work on tax-related matters; and consulting on the Receiver's website, [www.mediatrixreceivership.com](http://www.mediatrixreceivership.com). 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 their counsel in connection with issues regarding real property assets, personal property assets and other assets. The majority of communications in the Second Expense Period concerned insurance coverage on certain real property and communications with insurance vendors regarding same. 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.

### **FEES 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 Second 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 March 31, 2022 and requested in the Motion. Based on the cash on hand reported in the Receiver's Second Report that was filed on April 29, 2022 [ECF 324], the Receivership Estate has \$12,490,287.49 on hand net of accrued and unpaid fees and costs totaling \$80,960.29.<sup>1</sup>

### **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

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<sup>1</sup> The current balance net of accrued fees is \$12,409,327.20.

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

Respectfully submitted,

Dated: May 27, 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 May 27, 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  
U.S. Securities and Exchange Commission  
1961 Stout Street, Suite 1700  
Denver, CO 80294-1961  
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Ohonkova Sewall*

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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 73<sup>rd</sup> 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.

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**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 JANUARY 1, 2022 THROUGH MARCH 31, 2022**

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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 January 1, 2022 through March 31, 2022* (the "Second 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 Second 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 \$4,130.00 and costs of \$4.50 for a total of \$4,134.50 for the Second 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 \$9,045.00 and RMA's costs of \$224.12 for a total of \$9,269.12 for the Second 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 \$515.25 for the Second 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 \$717.60 for the Second Expense Period.

9. In accordance with the Receiver Order, I certify that the Second 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 Second 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 May 27, 2022 at Newark, New Jersey.

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

# **EXHIBIT A**



**Gibbons P.C.**

Time Detail

Run Date: 5/4/2022

<b>Client/Matter:</b> 117199 106197	<b>Mark Conlan</b> <b>Mark Conlan in his capacity as SEC Receiver for Mediat</b>
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
02/02/2022	E-mails with J. Curtis and G. Miller re: 2021 tax return.	B70	02062	MC2	0.10	\$35.00
	<b>Sub-Total For Task:</b>	<b>B70</b>			<b>0.10</b>	<b>\$35.00</b>
	<b>Tax Issues</b>					
03/08/2022	Telephone call with securities plaintiff counsel at Faegre Drinker.	B62	02062	MC2	0.40	\$140.00
03/09/2022	Telephone calls with REDACTED re: Equiti.	B62	02062	MC2	0.20	\$70.00
	<b>Sub-Total For Task:</b>	<b>B62</b>			<b>0.60</b>	<b>\$210.00</b>
	<b>Litigation</b>					
02/15/2022	Telephone call with E. Rosen re: fee applications	B58	02062	MC2	0.20	\$70.00
02/16/2022	E-mails with E. Rosen and J. Curtis re: RMA fee application.	B58	02062	MC2	0.10	\$35.00
02/17/2022	Telephone call with E. Rosen re: fee application.	B58	02062	MC2	0.20	\$70.00
02/22/2022	E-mails with E. Rosen re: Gibbons fee application.	B58	02062	MC2	0.10	\$35.00
02/23/2022	Attend to e-mails with E. Rosen re: First Interim Fee Application.	B58	02062	MC2	0.10	\$35.00
02/24/2022	Telephone call with E. Rosen re: Q4 fee application.	B58	02062	MC2	0.20	\$70.00
03/03/2022	Attend to e-mails E. Rosen re: circulation of draft fee application.	B58	02062	MC2	0.10	\$35.00
03/04/2022	Telephone call with D. Crapo re: fee application.	B58	02062	MC2	0.10	\$35.00
03/21/2022	Draft e-mail to J. Curtis and R. Erekson re: Barnes & Thornburg fee award.	B58	02062	MC2	0.10	\$35.00
03/21/2022	E-mails with R. Erekson re: approval of fee payments per court order.	B58	02062	MC2	0.10	\$35.00
03/29/2022	E-mails with R. Erekson re: payment of approved 4th Quarter 2021 fee applications.	B58	02062	MC2	0.10	\$35.00
	<b>Sub-Total For Task:</b>	<b>B58</b>			<b>1.40</b>	<b>\$490.00</b>
	<b>Fee Applications</b>					
03/29/2022	Telephone call with REDACTED SEC re: case status.	B53	02062	MC2	0.50	\$175.00
	<b>Sub-Total For Task:</b>	<b>B53</b>			<b>0.50</b>	<b>\$175.00</b>
	<b>Case Administration</b>					
02/02/2022	Telephone call with E. Rosen re: open issues and next steps regarding recording of appointment order in Eastern District of Texas [0.2]; set up of receivership website [0.6]; and 2021 tax return [0.2].	B52	02062	MC2	1.00	\$350.00
02/12/2022	Draft e-mail to J. DePinto re: insurance for Young's residence.	B52	02062	MC2	0.10	\$35.00
02/16/2022	Attend to e-mails with G. Caris, T. Ashmore and R. Erekson re: payment of insurance bills.	B52	02062	MC2	0.10	\$35.00
02/16/2022	E-mails with J. Curtis re: Robb Evans returned 1099 form.	B52	02062	MC2	0.10	\$35.00
02/18/2022	E-mails with E. Rosen re: investor communications.	B52	02062	MC2	0.10	\$35.00
02/25/2022	Detailed e-mails with investor REDACTED re: receivership estate assets.	B52	02062	MC2	0.40	\$140.00
02/28/2022	Attend to e-mails with D. Crapo and investor REDACTED re: claims and distribution protocol.	B52	02062	MC2	0.20	\$70.00
03/01/2022	Telephone call with REDACTED re: case status, claims and distribution process.	B52	02062	MC2	0.40	\$140.00
03/08/2022	Attend to e-mails with A. Jen and R. Erekson re: wire transfer from Robb Evans.	B52	02062	MC2	0.10	\$35.00
03/10/2022	E-mails with investor REDACTED.	B52	02062	MC2	0.10	\$35.00
03/11/2022	E-mails with E. Rosen re: tracking investors contacts.	B52	02062	MC2	0.10	\$35.00
03/11/2022	Telephone call with E. Rosen re: tracking investor contacts and information.	B52	02062	MC2	0.10	\$35.00
03/14/2022	Attending to e-mails with G. Caris and R. Erekson re: payment of insurance bills for Young's property [0.1]; follow-up e-mails with T. Ashmore and D. Crapo re: replacement of Robb Evans' property insurance [0.1].	B52	02062	MC2	0.20	\$70.00
03/17/2022	E-mails with R. Erekson re: payment of insurance premium.	B52	02062	MC2	0.10	\$35.00
03/18/2022	E-mails with R. Erekson on and T. Ashmore re: payment of Port Charlotte property taxes.	B52	02062	MC2	0.10	\$35.00
03/25/2022	E-mails with H. Topitz re: replacement insurance policies.	B52	02062	MC2	0.10	\$35.00
03/25/2022	Look up Young Property on Arapahoe Tax website for insurance policy.	B52	02062	MC2	0.10	\$35.00
03/25/2022	Telephone call with H. Topitz re: insurance policy for Greenwood Village property.	B52	02062	MC2	0.40	\$140.00
03/25/2022	Telephone call with E. Rosen re: binding insurance on Greenwood Village property.	B52	02062	MC2	0.20	\$70.00
03/25/2022	Draft detailed e-mail to H. Topitz re: case background and need for insurance on Greenwood Village property.	B52	02062	MC2	0.40	\$140.00
03/31/2022	Telephone call with East West Bank confirming wire transfer.	B52	02062	MC2	0.10	\$35.00
	<b>Sub-Total For Task:</b>	<b>B52</b>			<b>4.50</b>	<b>\$1,575.00</b>
	<b>Business Operations</b>					

**Gibbons P.C.**

Time Detail

Run Date: 5/4/2022

<b>Client/Matter:</b> 117199 106197	<b>Mark Conlan</b> <b>Mark Conlan in his capacity as SEC Receiver for Mediat</b>
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<b>Tran Date</b>	<b>Description Of Services</b>	<b>Task Code</b>	<b>Tkpr</b>	<b>Initials</b>	<b>Hours</b>	<b>Value</b>
02/01/2022	Review e-mails from J. Hankins re: 1197 Lloyds Road purchase offer.	B51	02062	MC2	0.10	\$35.00
02/02/2022	E-mails with J. Hankins re: sale of 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$35.00
02/02/2022	Telephone call with J. Hankins re: sale of 1197 Lloyds Road.	B51	02062	MC2	0.40	\$140.00
02/10/2022	Attend to e-mails with J. Hankins and D. Crapo re: purchase offers on 1197 Lloyds Road [0.1]; review same [0.1].	B51	02062	MC2	0.20	\$70.00
02/17/2022	Telephone call and e-mails with J. Hankins re: sale of 1197 Lloyds Road property.	B51	02062	MC2	0.20	\$70.00
02/17/2022	Review new purchase offer from J. Hankins; review and respond to e-mail from J. Hankins re: auction process.	B51	02062	MC2	0.40	\$140.00
03/16/2022	Attend to emails with Justin Cunningham re: disposition of 39' Sea Vee motor yacht.	B51	02062	MC2	0.10	\$35.00
03/16/2022	Confer with D. Barney re: valuation and disposition of damaged 39' Sea Vee motor yacht [0.2]; e-mails with SEC counsel re: same [0.2].	B51	02062	MC2	0.40	\$140.00
03/21/2022	Confer with D. Crapo re: sale of vehicles.	B51	02062	MC2	0.20	\$70.00
03/30/2022	Attend to e-mails with J. Hankins re: new offer on 1197 Lloyds Road Property.	B51	02062	MC2	0.10	\$35.00
	<b>Sub-Total For Task:</b>	<b>B51</b>	<b>Sale Motion/363 Sales</b>		<b>2.20</b>	<b>\$770.00</b>
02/02/2022	E-mail with D. Crapo and R. Erikson re: retention and payment of Lowery Property Advisors for 1197 Lloyds Road appraisal.	B50	02062	MC2	0.10	\$35.00
02/02/2022	Confer with D. Crapo re: retention of appraiser.	B50	02062	MC2	0.10	\$35.00
02/03/2022	Review e-mails from D. Crapo and R. Erikson re: payment of appraisal fee for the 1197 Lloyds Road property.	B50	02062	MC2	0.10	\$35.00
02/05/2022	Attend to e-mails with J. Hankins and D. Crapo re: title to 1197 Lloyds Road.	B50	02062	MC2	0.30	\$105.00
02/17/2022	Review invoice from Pyles Whatley re: invoice for updated 1197 Lloyds Road real estate appraisal; e-mails with R. Erikson re: payment of same.	B50	02062	MC2	0.10	\$35.00
02/17/2022	Review and analyze Pyles Whatley appraisal for 1197 Lloyds Road property.	B50	02062	MC2	0.20	\$70.00
02/18/2022	Attend to e-mails with <b>REDACTED</b> re: case status and claims process [0.3]; fact research for same [0.3].	B50	02062	MC2	0.60	\$210.00
02/22/2022	Review e-mail from D. Crapo to V. Drohan re: correcting title issues with 1197 Lloyds Road property.	B50	02062	MC2	0.10	\$35.00
03/03/2022	Attend to e-mails with D. Barney re: Bahamas boat.	B50	02062	MC2	0.20	\$70.00
03/03/2022	Conference call with SEC team re: status, fee application and open issues.	B50	02062	MC2	0.70	\$245.00
	<b>Sub-Total For Task:</b>	<b>B50</b>	<b>Asset Analysis and Recovery</b>		<b>2.50</b>	<b>\$875.00</b>
	<b>Total For Matter:</b>	<b>106197</b>	<b>Mark Conlan in his capacity as SEC Recei</b>		<b>11.80</b>	<b>\$4,130.00</b>
<b>Totals For Client:</b>					<b>11.80</b>	<b>\$4,130.00</b>

### Gibbons P.C.

Time Summary  
Run Date: 5/4/2022

**Client/Matter:** 117199      **Mark Conlan**

<b>Atty Code</b>	<b>Initials</b>	<b>Attorney Name</b>	<b>Position</b>	<b>Hours</b>	<b>Avg Rate</b>	<b>Value</b>
02062	MC2	Conlan, Mark	Director	11.80	\$350.00	\$4,130.00
<b>Totals:</b>				<b>11.80</b>		<b>\$4,130.00</b>

**Gibbons P.C.**

Fee Application  
Run Date: 5/4/2022

**Client/Matter:** 117199 Mark Conlan

<b>Task/ Code</b>	<b>Description Of Services</b>	<b>Hours</b>	<b>Value</b>
B70	Tax Issues	0.10	\$35.00
B62	Litigation	0.60	\$210.00
B58	Fee Applications	1.40	\$490.00
B53	Case Administration	0.50	\$175.00
B52	Business Operations	4.50	\$1,575.00
B51	Sale Motion/363 Sales	2.20	\$770.00
B50	Asset Analysis and Recovery	2.50	\$875.00
<b>Totals:</b>		<b>11.80</b>	<b>\$4,130.00</b>

**Gibbons P.C.**Fee Application  
Run Date: 5/4/2022

Client/Matter: 117199 Mark Conlan

Task Code	Description Of Services	Hours	Value
<b>B70</b>	<b><u>Tax Issues</u></b>		
	02062 Conlan, Mark	0.10	\$35.00
<b>B70</b>	<b>Tax Issues</b>	<b>0.10</b>	<b>\$35.00</b>
<b>B62</b>	<b><u>Litigation</u></b>		
	02062 Conlan, Mark	0.60	\$210.00
<b>B62</b>	<b>Litigation</b>	<b>0.60</b>	<b>\$210.00</b>
<b>B58</b>	<b><u>Fee Applications</u></b>		
	02062 Conlan, Mark	1.40	\$490.00
<b>B58</b>	<b>Fee Applications</b>	<b>1.40</b>	<b>\$490.00</b>
<b>B53</b>	<b><u>Case Administration</u></b>		
	02062 Conlan, Mark	0.50	\$175.00
<b>B53</b>	<b>Case Administration</b>	<b>0.50</b>	<b>\$175.00</b>
<b>B52</b>	<b><u>Business Operations</u></b>		
	02062 Conlan, Mark	4.50	\$1,575.00
<b>B52</b>	<b>Business Operations</b>	<b>4.50</b>	<b>\$1,575.00</b>
<b>B51</b>	<b><u>Sale Motion/363 Sales</u></b>		
	02062 Conlan, Mark	2.20	\$770.00
<b>B51</b>	<b>Sale Motion/363 Sales</b>	<b>2.20</b>	<b>\$770.00</b>
<b>B50</b>	<b><u>Asset Analysis and Recovery</u></b>		
	02062 Conlan, Mark	2.50	\$875.00
<b>B50</b>	<b>Asset Analysis and Recovery</b>	<b>2.50</b>	<b>\$875.00</b>
<b>Totals:</b>		<b>11.80</b>	<b>\$4,130.00</b>

**Gibbons P.C.**

Disbursement Detail  
Run Date: 5/4/2022

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

Tran Date	Description Of Disbursement	Value
<hr/>		
<b><u>Disbursement Type:</u></b>	<b><u>Legal Research - PACER</u></b>	
	<b>Total:</b>	<b>\$4.50</b>
<b>Total Disbursements:</b>		<b>\$4.50</b>

## **EXHIBIT B**

**Rocky Mountain Advisory LLC**  
 15 West South Temple, Suite 500  
 Salt Lake City, UT 84101  
 (801) 428-1600



May 04, 2022

**Mark Conlan, Reciever**  
 Gibbons Law Firm

**Invoice Number: 15644**

Invoice Period: 01-04-2022 - 03-31-2022

Payment Terms: Net 15

**RE: Mediatrix Capital**

SEC v. Mediatrix

**Time Details**

<b>Date</b>	<b>Staff Member</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
<u>Accounting</u>				
01-06-2022	HD	Update QuickBooks with December 2021 activity.	0.80	184.00
01-11-2022	HD	Began preparation of 4th quarter report.	0.90	207.00
01-13-2022	HD	Prepare 2021 4th Quarter Report.	2.60	598.00
01-14-2022	HD	Completed 4th Quarter report and sent to J. Curtis for review.	0.90	207.00
01-19-2022	JHC	Reviewed quarterly report for the quarter ended December 31, 2021, and reviewed bank transactions to ensure completeness (1.1). Reviewed SEC reporting requirements and determined revisions to format to conform with reporting needed (.3). Directed H. Denison in revising and update quarterly report (.6). Prepared final exhibits and sent to M. Conlan for preparation of quarterly report (.3).	2.30	724.50
01-19-2022	HD	Make updates to 4th Quarter report after review with J. Curtis.	1.90	437.00
01-26-2022	JHC	Prepared report of accrued and unpaid professional fees for the quarter ended December 31, 2021 and compared and confirmed against billing statements and records (1.3). Prepared fee statement data for inclusion in summary of accrued and unpaid fees report and requested electronic data for summarization from Receiver's office (1.1). Updated filed and accounting records (.2).	2.60	819.00
01-27-2022	JHC	Updated summary report of accrued and unpaid professional fees and receiver's fees for the quarter ended December 31, 2021 and provided to Receiver's office for quarterly report.	0.90	283.50
02-23-2022	HD	Validate Q1 figures for counsel (.4). Update QuickBooks with year-to-date transactions (.5).	0.90	207.00
03-31-2022	JHC	Email communications with M. Conlan regarding payment	0.40	126.00



Date	Staff Member	Description	Hours	Amount
<u>Accounting</u>				
		of professional fees (.2). Worked with R. Erikson on wire transfer for payment of fees and related issues (.2).	14.20	3,793.00
<u>Case Administration</u>				
01-10-2022	GAM	Respond to receiver email regarding bank account interest.	0.10	42.50
01-11-2022	RE	Prepare insurance payment and document.	0.10	9.00
01-20-2022	RE	Prepare check for vendor and document for file.	0.10	9.00
01-21-2022	GAM	Work with counsel's office and website designer to begin build of website.	0.50	212.50
01-24-2022	GAM	Prepare for and attend Zoom meeting with website designer to finalize website design, including follow up emails.	0.80	340.00
02-01-2022	GAM	Work on uploading website training video to receiver's office.	0.20	85.00
02-16-2022	JHC	Email communications with receiver's office regarding fee statement (.1). Reviewed invoice for Q4 2021 fees and costs and provided revisions to R. Erikson (.3). Final review of Q4 2021 fees and costs and submitted to receiver for filing (.2).	0.60	189.00
02-18-2022	RE	Prepare check for insurance payment and document (.1). Prepare check for appraisal services and document (.1).	0.20	18.00
03-18-2022	RE	Prepare and document Charlotte County property tax payment.	0.30	27.00
03-31-2022	RE	Prepare wire to Gibbons for First Quarterly Fee Application.	0.50	45.00
			3.40	977.00
<u>Forensic/Investigation</u>				
01-05-2022	JM	Inventoried and organized bank statement, ATM receipts, and check and deposit copies received from the SEC for Banco Popular accounts ending in 9843 and 1784.	1.90	456.00
01-07-2022	JHC	Prepare for call with counsel and call with M. Conlan and D. Crapo regarding data and analysis for demand letters and tolling agreements.	0.80	252.00
01-10-2022	JM	Examined, inventoried, and organized bank statements, check copies, ATM receipts, and other documents received from the SEC for Banco Popular accounts ending in 9027, 8741, and 5590.	2.10	504.00
01-20-2022	JM	Analyzed and inventoried bank statements, check copies, articles of incorporation and other documents received.	0.60	144.00
01-21-2022	JHC	Reviewed email from M. Conlan regarding quarterly report, researched transaction and responded to receiver (.8). Updated cash disbursements summaries to include summary of broker payments and provided to M. Conlan (1.5).	2.30	724.50
01-21-2022	JM	Examined and inventoried documents received for Key Bank account ending in 6425, 0586, and 0022, TF Alliance bank statements and articles of organization, Ceska Sporitelna, and other documents received.	1.80	432.00
02-08-2022	JHC	Searched accounting data for information on sale of watercraft and followed up with former receiver's office (.5). Provided information to M. Conlan (.2).	0.70	220.50
02-08-2022	JM	Updated our inventory of documents received from the Securities and Exchange Commission to include additional	1.40	336.00

Date	Staff Member	Description	Hours	Amount
<u>Forensic/Investigation</u>				
		document references.		
			11.60	3,069.00
<u>Tax Work</u>				
01-04-2022	JG	Request Form 2 or cash ledger for 1099 filing requirements.	0.10	25.50
01-06-2022	HD	Review 2021 cash disbursements determining who needs a 1099.	2.10	483.00
01-11-2022	HD	Contact vendors requiring a 1099 and obtain W-9.	1.10	253.00
01-11-2022	JG	Review IRS Forms 1099.	0.20	51.00
01-31-2022	JG	E-file IRS Forms 1099.	0.10	25.50
03-22-2022	HD	Began preparation of 2021 Federal and State Tax Returns.	1.60	368.00
			5.20	1,206.00
			<b>Total</b>	<b>9,045.00</b>

**Time Summary**

Staff Member	Hours	Rate	Amount
Gil A. Miller	1.60	425.00	680.00
Heather Denison	12.80	230.00	2,944.00
Jennie Messer	7.80	240.00	1,872.00
John H. Curtis	10.60	315.00	3,339.00
Josh Gifford	0.40	255.00	102.00
Raani Ereksen	1.20	90.00	108.00
	<b>Total</b>		<b>9,045.00</b>

**Expense Summary**

Expense	Amount
Copies	2.10
Overnight Expenses	158.38
PACER	28.90
Postage	3.38
Supplies - Tax Forms	31.36
	<b>Total Expenses</b>
	<b>224.12</b>

<b>Total for this Invoice</b>	9,269.12
<b>Previous Invoice Balance</b>	12,214.61
Payment - Check number 1016 on 03-25-2022	(12,214.61)
<b>Total Amount to Pay as of 05-04-2022</b>	<b>9,269.12</b>

Pay by [clicking here](#) or by scanning the QR code



**Mark Conlan, Reciever**  
Gibbons Law Firm

May 04, 2022

**Rocky Mountain Advisory LLC**  
15 West South Temple, Suite 500  
Salt Lake City, UT 84101

**Invoice Number: 15644**  
Invoice Period: 01-04-2022 - 03-31-2022

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**REMITTANCE COPY**

**RE: Mediatrix Capital**

<b>Fees</b>	9,045.00
<b>Expenses</b>	224.12
<b>Total for this Invoice</b>	9,269.12
<b>Previous Invoice Balance</b>	12,214.61
Payment - Check number 1016 on 03-25-2022	(12,214.61)
<b>Total Amount to Pay as of 05-04-2022</b>	<b>9,269.12</b>

<b>Project</b>	<b>Balance Due</b>
Mediatrix Capital	9,269.12
<b>Total Amount to Pay</b>	<b>9,269.12</b>

**Open Invoices and Credits**

<b>Date</b>	<b>Transaction</b>	<b>Project</b>	<b>Amount</b>	<b>Applied</b>	<b>Balance</b>
05-04-2022	Invoice 15644	Mediatrix Capital	9,269.12		9,269.12
				<b>Balance</b>	<b>9,269.12</b>

Pay by [clicking here](#) or by scanning the QR code



## **EXHIBIT C**

Robb Evans & Associates LLC

11450 Sheldon Street  
Sun Valley, CA 91352

# Invoice

Date	Invoice #
1/31/2022	Mediatrix18

Bill To
Mark Conlan Receiver of Mediatrix Capital

P.O. No.

Description	Qty	Rate	Amount
For professional services provided from 1/1/22 to 1/31/22 by:			
A. Jen	0.3	342.00	102.60
C. DeCius	0.1	121.50	12.15
		<b>Total</b>	\$114.75

Tax ID # 95-4800611

**Fee Claims for: Robb Evans & Associates LLC  
Case : MEDIATRIX CAPITAL INC et al.  
January-22**

**Name :** Anita Jen

**Time Summary**

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

**Fee Claims for:** Robb Evans & Associates LLC  
**Case :** MEDIATRIX CAPITAL INC et al.  
**For the Month of :** January-22  
**Legal Activity :** Case Administration  
**Name :** Anita Jen

Date	Description	Hours
1/19/22	Prepare reconciliations between funds sent to Receiver and final accounting per John Curtis request	0.30

**Fee Claims for: Robb Evans & Associates LLC  
Case : MEDIATRIX CAPITAL INC et al.  
January-22**

**Name :** Carl DeCius

**Time Summary**

<b>Categories</b>	<b>Total Hours</b>	<b>Rate</b>	<b>Total amount</b>
<b>Asset Analysis and Recovery</b>	-	121.5	-
<b>Asset Disposition</b>	-	121.5	-
<b>Business Operations</b>	-	121.5	-
<b>Case Administration</b>	-	121.5	-
<b>Claims Administration and Objections</b>	-	121.5	-
<b>Employee Benefits/ Pensions</b>	-	121.5	-
<b>Accounting/Auditing</b>	0.10	121.5	12.15
<b>Business Analysis</b>	-	121.5	-
<b>Corporate Finance</b>	-	121.5	-
<b>Data Analysis</b>	-	121.5	-
<b>Status Reports</b>	-	121.5	-
<b>Litigation Consulting</b>	-	121.5	-
<b>Forensic Accounting</b>	-	121.5	-
<b>Tax Issues</b>	-	121.5	-
<b>Valuation</b>	-	121.5	-
<b>Total</b>	<u>0.10</u>	121.5	<u>12.15</u>



**Fee Claims for:** Robb Evans & Associates LLC  
**Case :** MEDIATRIX CAPITAL INC et al.  
**For the Month of :** January-22  
**Financial Activity :** Accounting/Auditing  
**Name :** Carl DeCius

Date	Description	Hours
1/7/22	Prepare and forward December insurance billings for payment.	0.10

Robb Evans & Associates LLC

11450 Sheldon Street  
Sun Valley, CA 91352

# Invoice

Date	Invoice #
2/28/2022	Mediatrix19

Bill To
Mark Conlan Receiver of Mediatrix Capital

P.O. No.

Description	Qty	Rate	Amount
For professional services provided from 2/1/28 to 2/28/22 by:			
A. Jen	0.8	342.00	273.60
C. DeCius	0.1	121.50	12.15
		<b>Total</b>	\$285.75

**Fee Claims for: Robb Evans & Associates LLC  
Case : MEDIATRIX CAPITAL INC et al.  
February-22**

**Name :** Anita Jen

**Time Summary**

Categories	Total Hours	Rate	Total amount
Asset Analysis and Recovery	-	342	-
Asset Disposition	-	342	-
Business Operations	-	342	-
Case Administration	0.80	342	273.60
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	
<b>Total</b>	<u>0.80</u>		<u>273.60</u>

**Fee Claims for:** Robb Evans & Associates LLC  
**Case :** MEDIATRIX CAPITAL INC et al.  
**For the Month of :** February-22  
**Legal Activity :** Case Administration  
**Name :** Anita Jen

Date	Description	Hours
2/8/22	Research and reply to J. Curtis email	0.60
2/8/22	coordinate website update per E. Rosen's request	0.10
2/9/22	coordinate website update per E. Rosen's request	0.10

**Fee Claims for: Robb Evans & Associates LLC  
Case : MEDIATRIX CAPITAL INC et al.  
February-22**

**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	-	121.5	-
Claims Administration and Objections	-	121.5	-
Employee Benefits/ Pensions	-	121.5	-
Accounting/Auditing	0.10	121.5	12.15
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	
<b>Total</b>	<u>0.10</u>		<u>12.15</u>

Fee Claims for: Robb Evans & Associates LLC  
Case : MEDIATRIX CAPITAL INC et al.  
For the Month of : February-22  
Financial Activity : Accounting/Auditing  
Name : Carl DeCius

Date	Description	Hours
2/16/22	Prepare and forward Receivership insurance Billings for payment.	0.10

Robb Evans & Associates LLC

11450 Sheldon Street  
Sun Valley, CA 91352

# Invoice

Date	Invoice #
3/31/2022	Mediatrix20

Bill To
Mark Conlan Receiver of Mediatrix Capital

P.O. No.

Description	Qty	Rate	Amount
For professional services provided from 3/1/22 to 3/31/22 by:			
A. Jen	0.3	342.00	102.60
C. DeCius	0.1	121.50	12.15
		<b>Total</b>	\$114.75

**Fee Claims for: Robb Evans & Associates LLC  
Case : MEDIATRIX CAPITAL INC et al.  
March-22**

**Name :** Anita Jen

**Time Summary**

Categories	Total Hours	Rate	Total amount
Asset Analysis and Recovery	-	342	-
Asset Disposition	-	342	-
Business Operations	-	342	-
Case Administration	0.30	342	102.60
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	
<b>Total</b>	<u>0.30</u>		<u>102.60</u>



Fee Claims for: Robb Evans & Associates LLC  
Case : MEDIATRIX CAPITAL INC et al.  
For the Month of : March-22  
Legal Activity : Case Administration  
Name : Anita Jen

Date	Description	Hours
3/8/22	Prepare final wire and send to Receiver from Enterprise Bank; download bank statement from 11/10/21 to 2/28/22; request bank to close account after funds are wired; email G. Caris of the transaction; receive confirmation from Bank to close account	0.20
3/8/22	Email wire and bank statement to M. Colon	0.10
3/17/22	Email Receiver with refund check received from Orange Coast Title	0.00

**Fee Claims for: Robb Evans & Associates LLC  
Case : MEDIATRIX CAPITAL INC et al.  
March-22**

**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	-	121.5	-
Claims Administration and Objections	-	121.5	-
Employee Benefits/ Pensions	-	121.5	-
Accounting/Auditing	0.10	121.5	12.15
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	
<b>Total</b>	<u>0.10</u>		<u>12.15</u>

Fee Claims for: Robb Evans & Associates LLC  
Case : MEDIATRIX CAPITAL INC et al.  
For the Month of : March-22  
Financial Activity : Accounting/Auditing  
Name : Carl DeCius

Date	Description	Hours
3/14/22	Approve and forward insurance bill for payment.	0.10

**EXHIBIT D**

**BARNES & THORNBURG** LLP

2029 Century Park East, Suite 300  
Los Angeles, CA 90067-2904 U.S.A.

(310) 284-3880

Invoice 2575130

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

February 09, 2022  
Gary O. Caris  
00061044-000026

PAYABLE UPON RECEIPT

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Fees for Services	\$	119.60
Other Charges	\$	<u>0.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$</b>	<b>119.60</b>

REMITTANCE



**BARNES & THORNBURG** LLP

2029 Century Park East, Suite 300  
Los Angeles, CA 90067-2904 U.S.A.

[REDACTED]  
(310) 284-3880

Invoice 2575130

Page 2

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

February 09, 2022  
Gary O. Caris  
00061044-000026

PAYABLE UPON RECEIPT

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**00061044-000026**  
**MEDIATRIX CAPITAL, INC.**

For legal services rendered in connection with the above matter for the period ending January 31, 2022 as described on the attached detail.

Fees for Services	\$	119.60
<b>TOTAL THIS INVOICE</b>	<b>\$</b>	<b>119.60</b>

00061044-000026 ROBB EVANS & ASSOCIATES LLC

MEDIATRIX CAPITAL, INC.

CASE ADMINISTRATION

01/07/22	GOC	Prepared and sent e-mail to Conlan regarding three insurance invoices.	0.10
01/07/22	GOC	Analyzed e-mail from DeCius regarding insurance invoices.	0.10
SEC140	CASE ADMINISTRATION		0.20
Fees for Services Total			\$119.60

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Gary O. Caris	0.20	\$598.00	\$119.60
TOTALS	0.20		\$119.60

**BARNES & THORNBURG** LLP

2029 Century Park East, Suite 300  
Los Angeles, CA 90067-2904 U.S.A.

(310) 284-3880

Invoice 2585797

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

March 07, 2022  
Gary O. Caris  
00061044-000026

PAYABLE UPON RECEIPT

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Fees for Services	\$	179.40
Other Charges	\$	<u>0.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$</b>	<b>179.40</b>

REMITTANCE





**BARNES & THORNBURG** LLP

2029 Century Park East, Suite 300  
Los Angeles, CA 90067-2904 U.S.A.

[REDACTED]  
(310) 284-3880

Invoice 2585797

Page 2

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

March 07, 2022  
Gary O. Caris  
00061044-000026

PAYABLE UPON RECEIPT

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**00061044-000026**  
**MEDIATRIX CAPITAL, INC.**

For legal services rendered in connection with the above matter for the period ending February 28, 2022 as described on the attached detail.

Fees for Services	\$	179.40
<b>TOTAL THIS INVOICE</b>	<b>\$</b>	<b>179.40</b>

00061044-000026 ROBB EVANS & ASSOCIATES LLC

MEDIATRIX CAPITAL, INC.

CASE ADMINISTRATION

02/03/22	GOC	Exchanged e-mails with Conlan regarding depositions of defendants (including e-mails exchanged 2/2 and 2/3).	0.10
02/16/22	GOC	Exchanged e-mails with A. Jen and DeCius regarding insurance invoices on three properties and reviewed invoices.	0.10
02/16/22	GOC	Prepared and sent e-mail to Conlan regarding insurance invoices.	0.10
SEC140	CASE ADMINISTRATION		0.30
Fees for Services Total			\$179.40

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Gary O. Caris	0.30	\$598.00	\$179.40
TOTALS	0.30		\$179.40

**BARNES & THORNBURG LLP**

2029 Century Park East, Suite 300  
Los Angeles, CA 90067-2904 U.S.A.

(310) 284-3880

Invoice 2599441

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

April 13, 2022  
Gary O. Caris  
00061044-000026

PAYABLE UPON RECEIPT

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Fees for Services	\$	418.60
Other Charges	\$	<u>0.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$</b>	<b>418.60</b>

REMITTANCE



**BARNES & THORNBURG** LLP

2029 Century Park East, Suite 300  
Los Angeles, CA 90067-2904 U.S.A.

[REDACTED]  
(310) 284-3880

Invoice 2599441

Page 2

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

April 13, 2022  
Gary O. Caris  
00061044-000026

PAYABLE UPON RECEIPT

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**00061044-000026**  
**MEDIATRIX CAPITAL, INC.**

For legal services rendered in connection with the above matter for the period ending March 31, 2022 as described on the attached detail.

Fees for Services	\$	418.60
<b>TOTAL THIS INVOICE</b>	\$	<b>418.60</b>

00061044-000026 ROBB EVANS &amp; ASSOCIATES LLC

Page 3

MEDIATRIX CAPITAL, INC.

CASE ADMINISTRATION

03/08/22	GOC	Exchanged e-mails with A. Jen regarding remaining payment made to Conlan to close out account; analyzed e-mail from A. Jen to Conlan regarding same.	0.10
03/14/22	GOC	Analyzed e-mail from DeCius regarding insurance billings on three properties; prepared and sent e-mail to Conlan forwarding same.	0.10
03/16/22	GOC	Analyzed e-mails between Conlan and Felder regarding Mediatrix corporate documents.	0.10
03/16/22	GOC	Analyzed fee motion filed by Conlan (.2 - NO CHARGE).	NO CHARGE
03/18/22	GOC	Exchanged e-mails with Conlan regarding fee order and proper amount for payment.	0.20
03/18/22	GOC	Analyzed e-mail from DeCius regarding Port Charlotte tax bill; prepared and sent e-mail to Conlan regarding same.	0.10
03/21/22	GOC	Exchanged e-mails with Conlan regarding Ashmore's representation regarding collection from charities.	0.10
SEC140	CASE ADMINISTRATION		0.70
Fees for Services Total			\$418.60

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Gary O. Caris	0.70	\$598.00	\$418.60
TOTALS	0.70		\$418.60

**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.

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**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 JANUARY 1, 2022 THROUGH MARCH 31, 2022**

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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 January 1, 2022 through March 31, 2022* (the "Second 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 \$66,621.00 and costs of \$465.32 for a total of \$67,086.32 for the Second Expense Period.

5. In accordance with the Receiver Order, I certify that the Second 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 Second 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 May 27, 2022 at Newark, New Jersey.

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

**Gibbons P.C.**

Time Detail

Run Date: 5/4/2022

<b>Client/Matter:</b> 117199 106202	<b>Mark Conlan</b> <b>Counsel to Mark Conlan in his capacity as SEC Receiver</b>
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
01/19/2022	Review Joint Status Report filed by SEC and Defendants.	RE05	02062	MC2	0.10	\$59.85
01/24/2022	Review quarterly reports and related information [0.5]; draft detailed email to team regarding quarterly report parameters [0.5]; confer and email with team re: same [0.2].	RE05	26059	ER	1.20	\$329.40
01/25/2022	E-mails to/from E. Rosen re: 4th Quarter report.	RE05	02548	DC	0.10	\$59.85
01/25/2022	Draft Quarterly Report for 10/20/21 through 12/31/21 [2.7]; email with team re: same [0.1]; review and receipt of quarterly report exhibits from J. Curtis [0.1].	RE05	26059	ER	2.90	\$796.05
01/26/2022	E-mails to/from E. Rosen and M. Conlan re: quarterly report.	RE05	02548	DC	0.20	\$119.70
01/26/2022	Review and revise quarterly report.	RE05	02548	DC	0.80	\$478.80
01/26/2022	Draft Quarterly Report for 10/20/21 through 12/31/21 [1.5]; detailed email with J. Curtis re: accrued and unpaid administrative expenses [0.5]; confer and email with team re: same [0.2].	RE05	26059	ER	2.20	\$603.90
01/26/2022	Review comments and changes to draft Quarterly Report [0.3]; detailed email with team re: same [0.2].	RE05	26059	ER	0.50	\$137.25
01/27/2022	Review and revise Q4 Report [1.3]; circulate same to E. Rosen and D. Crapo [0.1].	RE05	02062	MC2	1.40	\$837.90
01/27/2022	Review and respond to e-mails from E. Rosen re: quarterly report.	RE05	02548	DC	0.20	\$119.70
01/27/2022	Review of and revisions to quarterly report.	RE05	02548	DC	0.20	\$119.70
01/27/2022	Confer with team re: Quarterly Report.	RE05	26059	ER	0.20	\$54.90
01/27/2022	Draft Quarterly Report for 10/20/21 through 12/31/21 [1.9]; email with team re: same [0.3].	RE05	26059	ER	2.20	\$603.90
01/28/2022	Review and revise Q4 2021 report [0.7]; e-mails with E. Rosen and D. Crapo re: same [0.2].	RE05	02062	MC2	0.90	\$538.65
01/28/2022	E-mails to/from E. Rosen and M. Conlan re: quarterly report.	RE05	02548	DC	0.20	\$119.70
01/28/2022	Draft portions of Quarterly Report for 10/20/21 through 12/31/21 [2.8]; email with J. Curtis re: same [0.1]; draft Certificate of Service for Same [0.1]; prepare same for electronic filing [0.2]; file and serve same [0.2]; review and receipt of as-filed copies [0.1]; coordinate email and mail service [0.1]; email and confer with team re: same [0.2].	RE05	26059	ER	3.80	\$1,043.10
	<b>Sub-Total For Task:</b>	<b>RE05</b>	<b>Status Reports</b>		<b>17.10</b>	<b>\$6,022.35</b>
01/04/2022	Review e-mails and the Youngs' opposition to motion to approve Equiti settlement in preparation for conference call with SEC.	B62	02548	DC	0.40	\$239.40
01/05/2022	Attend to e-mails with REDACTED and D. Crapo re: potential litigation claims.	B62	02062	MC2	0.10	\$59.85
01/05/2022	Review and analyze Young opposition to Equiti settlement.	B62	02062	MC2	0.30	\$179.55
01/10/2022	Research re: background on REDACTED powerboat in Bahamas.	B62	02518	DEB	0.80	\$478.80
01/10/2022	Confer with M. Conlan re: REDACTED boat.	B62	02518	DEB	0.30	\$179.55
01/10/2022	Review SEC complaint.	B62	02518	DEB	0.30	\$179.55
01/11/2022	Research re: location and control of REDACTED 39' SeaVee motor boat.	B62	02518	DEB	0.60	\$359.10
01/11/2022	Emails to/from M. Conlan re: 39' SeaVee motor boat.	B62	02518	DEB	0.20	\$119.70
01/11/2022	Draft email to C. Illing re: REDACTED boat [0.5]; emails to/from M. Conlan re: same [0.4].	B62	02518	DEB	0.90	\$538.65
01/11/2022	Review and respond to emails from M. Conlan and Michael Stewart's counsel re response to Michael Stewart's notice, including consideration of additional tolling agreements.	B62	02548	DC	0.30	\$179.55
01/12/2022	Confer with team re: 10th Circuit admission logistics.	B62	26059	ER	0.20	\$54.90
01/13/2022	Finalize email to C. Illing re: SeaVee [0.1]; review pleadings re: same [0.9].	B62	02518	DEB	1.00	\$598.50
01/18/2022	Review and analyze deposition transcript of Aaron Stewart	B62	02062	MC2	0.70	\$418.95
01/18/2022	Confer with Tony Bingham, Shawn Stewart's attorney re tolling letter and Mr. Stewart's defenses.	B62	02548	DC	0.30	\$179.55
01/18/2022	Emails to/from M. Conlan re telephone conference with Tony Bingham, Shawn Stewart's attorney re tolling letter and Mr. Stewart's defenses.	B62	02548	DC	0.20	\$119.70
01/18/2022	Begin review of deposition transcripts in preparation for asset recovery actions.	B62	02548	DC	0.30	\$179.55
01/18/2022	Emails to/from E. Rosen re transcripts.	B62	02548	DC	0.10	\$59.85
01/19/2022	Review and analyze SEC Reply to Young Opposition to Equiti Settlement.	B62	02062	MC2	0.20	\$119.70
01/19/2022	Legal research on issuing document subpoena in UK.	B62	02062	MC2	0.30	\$179.55
01/20/2022	Begin review of deposition transcripts re: property recovery litigation.	B62	02548	DC	2.10	\$1,256.85
01/21/2022	Continue review of deposition transcripts re: property recovery litigation.	B62	02548	DC	2.00	\$1,197.00
01/24/2022	Continue review of deposition transcripts re: property recovery litigation.	B62	02548	DC	0.70	\$418.95
01/25/2022	Review Order Granting Drohan motion to withdraw as counsel to Stewarts, et al.	B62	02062	MC2	0.10	\$59.85
01/27/2022	Emails re: boat status.	B62	02518	DEB	0.20	\$119.70



**Gibbons P.C.**

Time Detail

Run Date: 5/4/2022

<b>Client/Matter:</b> 117199 106202	<b>Mark Conlan</b> <b>Counsel to Mark Conlan in his capacity as SEC Receiver</b>
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
01/27/2022	E-mails to/from class plaintiffs' counsel, REDACTED, re: claims.	B62	02548	DC	0.20	\$119.70
01/28/2022	Review Young's 10th Circuit Motion for Stay Pending Appeal [0.1]; e-mails with J. Hradil re: same [0.1].	B62	02062	MC2	0.20	\$119.70
01/28/2022	Continue reading deposition transcripts re: REDACTED .	B62	02548	DC	1.40	\$837.90
01/31/2022	Review e-mail from D. Crapo to REDACTED re: potential class action claim.	B62	02062	MC2	0.10	\$59.85
01/31/2022	Review documents in support of further receivership claims.	B62	02548	DC	1.00	\$598.50
02/02/2022	E-mails to/from M. Conlan re: impact of delay in criminal trial.	B62	02548	DC	0.10	\$59.85
02/02/2022	Begin research for obtaining discovery in UK.	B62	02548	DC	0.10	\$59.85
02/02/2022	Confer and email with M. Conlan re: Apostille and international service.	B62	26059	ER	0.20	\$54.90
02/14/2022	Review Young's Motion for Stay Pending Appeal in 10th Circuit appeal.	B62	02062	MC2	0.20	\$119.70
02/14/2022	Detailed email with team re: defendant depositions.	B62	26059	ER	0.20	\$54.90
02/17/2022	Review SEC 10th Circuit Brief in Opposition to Defense Motion for Stay Pending Appeal	B62	02062	MC2	0.20	\$119.70
02/23/2022	Review briefs submitted to the Tenth Circuit by the SEC and the Youngs re: motion for leave to file a sur-reply.	B62	02062	MC2	0.20	\$119.70
03/04/2022	Confer with M. Conlan re: powerboat.	B62	02518	DEB	0.20	\$119.70
03/04/2022	Draft Email to Compass Power re: possession of SeaVee powerboat.	B62	02518	DEB	0.50	\$299.25
03/08/2022	Emails to/from M. Conlan re: Powerboat and authorization to seize same.	B62	02518	DEB	0.70	\$418.95
03/08/2022	Telephone with Compass Power re: status of repairs on SeaVee 39.	B62	02518	DEB	0.20	\$119.70
03/08/2022	Telephone with M. Conlan re: status of repairs on SeaVee 39.	B62	02518	DEB	0.40	\$239.40
03/09/2022	Telephone call with securities counsel D. Porteous.	B62	02062	MC2	0.30	\$179.55
03/15/2022	Review Young's Unopposed Motion for Mediation.	B62	02062	MC2	0.10	\$59.85
03/16/2022	Confer with M. Conlan re: powerboat.	B62	02518	DEB	0.30	\$179.55
03/16/2022	Research re: registration of M/V Currenseas.	B62	02518	DEB	0.70	\$418.95
03/21/2022	Review order for mediation status conference; e-mails with D. Crapo re: same.	B62	02062	MC2	0.10	\$59.85
03/21/2022	Review motion to extend case deadlines.	B62	02062	MC2	0.10	\$59.85
03/24/2022	Update Parties and Potential Witness List.	B62	26059	ER	0.30	\$82.35
03/24/2022	Review secondary source research re: potential fraudulent transfer complaints [0.7]; confer and email with M. Conlan and team re: same [0.3].	B62	26059	ER	1.00	\$274.50
03/25/2022	Emails to/from M. Conlan re: Powerboat condition and repairs [0.1]; review photographs [0.2].	B62	02518	DEB	0.30	\$179.55
03/29/2022	Review court notice re: Young mediation.	B62	02548	DC	0.10	\$59.85
03/30/2022	Confer with M. Conlan re: fraudulent transfer claims.	B62	02518	DEB	0.40	\$239.40
03/30/2022	Research re: marine surveyor and Volvo outdrive [0.4]; emails re: same [0.1].	B62	02518	DEB	0.50	\$299.25
03/30/2022	E-mails with E. Rosen and D. Crapo re: motion for leave to conduct avoidance litigation.	B62	02062	MC2	0.10	\$59.85
03/30/2022	Telephone call with E. Rosen re: research on avoidance claims and defendant addresses.	B62	02062	MC2	0.50	\$299.25
03/30/2022	Reviewing and analyzing background documents for potential avoidance claims, including REDACTED Declaration and exhibits referenced therein.	B62	02062	MC2	2.80	\$1,675.80
03/30/2022	Review transcript of SEC deposition of Michael Young.	B62	02062	MC2	0.50	\$299.25
03/30/2022	Legal research on avoidance of net winner claims.	B62	02062	MC2	1.70	\$1,017.45
03/30/2022	Telephone call with D. Barney re: broker and net winner avoidance claims.	B62	02062	MC2	0.40	\$239.40
03/30/2022	Telephone call with REDACTED at SEC re: avoidance claims.	B62	02062	MC2	0.80	\$478.80
03/30/2022	Further research on re: potential fraudulent transfer complaints [1.1]; confer and email with M. Conlan re: same [0.4].	B62	26059	ER	1.50	\$411.75
03/31/2022	E-mails with E. Rosen re: fact research for tolling and demand letters.	B62	02062	MC2	0.10	\$59.85
03/31/2022	Reviewing background documents, including Young Deposition transcript for potential avoidance claims.	B62	02062	MC2	2.50	\$1,496.25
	<b>Sub-Total For Task:</b>	<b>B62</b>	<b>Litigation</b>		<b>33.80</b>	<b>\$19,127.70</b>
01/18/2022	Docket deadlines for SEC approval of fee applications.	B58	26059	ER	0.20	\$54.90
01/25/2022	Review and receipt of Barnes Thornburg and Robb Evans fees for October-December 2021; email with M. Conlan and G. Caris re: same.	B58	26059	ER	0.10	\$27.45
02/01/2022	Draft Fee Application.	B58	26059	ER	0.10	\$27.45

**Gibbons P.C.**

Time Detail

Run Date: 5/4/2022

<b>Client/Matter:</b> 117199 106202	<b>Mark Conlan</b> <b>Counsel to Mark Conlan in his capacity as SEC Receiver</b>
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
02/04/2022	E-mails with E. Rosen and SEC re: first fee application.	B58	02062	MC2	0.10	\$59.85
02/11/2022	Draft Fee Application.	B58	26059	ER	1.70	\$466.65
02/14/2022	Draft Fee Application.	B58	26059	ER	0.90	\$247.05
02/16/2022	Draft Fee Application [1.9]; email with J. Curtis and G. Miller and team re: same [0.2].	B58	26059	ER	2.10	\$576.45
02/17/2022	Draft Fee Application [1.9]; confer with M. Conlan and email with team re: same [0.4].	B58	26059	ER	2.30	\$631.35
02/18/2022	Review and revise First Interim Fee Application.	B58	02062	MC2	0.60	\$359.10
02/18/2022	Draft Conlan Declaration in support of First Quarterly Fee Application [1.1]; email with team re: same [0.1].	B58	26059	ER	1.20	\$329.40
02/22/2022	Detailed email with J. Curtis re: description of RMA services in 1st Quarterly Fee Application and verification of cash on hand ([01]; email with team re: same [0.1].	B58	26059	ER	0.20	\$54.90
02/22/2022	Draft Declaration of D. Crapo in Support of 1st Quarterly Fee Application [0.3]; email with team re: same [0.1].	B58	26059	ER	0.40	\$109.80
02/23/2022	Review and respond to emails to/from M. Conlan and E. Rosen re: fee applications.	B58	02548	DC	0.20	\$119.70
02/23/2022	Draft proposed order on First Quarterly Fee Application [0.5]; add footnote to First Quarterly Fee Application [0.1]; email with RMA and team re: same [0.2].	B58	26059	ER	0.80	\$219.60
02/24/2022	Prepare 1st Quarterly Fee Application for submission to SEC [1.1]; email to REDACTED, SEC submitting same [0.1]; confer with team re: same [0.1].	B58	26059	ER	1.30	\$356.85
03/02/2022	Email with M. Conlan re: upcoming call with SEC personnel.	B58	26059	ER	0.10	\$27.45
03/03/2022	E-mails to/from and confer with M. Conlan re: fee application.	B58	02548	DC	0.20	\$119.70
03/04/2022	Telephone call with E. Rosen re: finalizing fee application and serving same.	B58	02062	MC2	0.20	\$119.70
03/04/2022	E-mails to/from E. Rosen re: fee application.	B58	02548	DC	0.10	\$59.85
03/04/2022	Modify 1st Quarterly Fee Application to reflect SEC comments [0.1]; defendant contact research [0.3]; confer with team re: same [0.2].	B58	26059	ER	0.60	\$164.70
03/07/2022	Review and revise fee application [0.2]; attend to e-mails with E. Rosen and D. Crapo re: same [0.1].	B58	02062	MC2	0.30	\$179.55
03/07/2022	Review revised draft of fee application.	B58	02548	DC	0.10	\$59.85
03/07/2022	E-mails to/from M. Conlan and E. Rosen re: Quarterly Fee Application.	B58	02548	DC	0.20	\$119.70
03/07/2022	Modify 1st Quarterly Fee Application to reflect SEC comments [0.3]; draft Certificate of Service for same [0.1]; email with defendants re: same [0.2]; email with team re: same [0.2].	B58	26059	ER	0.80	\$219.60
03/08/2022	Attend to e-mail with T. Ashmore re: exhibits to 4th Quarter fee applications.	B58	02062	MC2	0.20	\$119.70
03/09/2022	Telephone call with E. Rosen re: fee application.	B58	02062	MC2	0.20	\$119.70
03/09/2022	Attend to e-mails with T. Ashmore re: fee application.	B58	02062	MC2	0.10	\$59.85
03/09/2022	Confer and detailed email with team re: Youngs' objection to 1st Quarterly Fee Application.	B58	26059	ER	0.30	\$82.35
03/10/2022	Telephone call with Tracy Ashmore re: fee application and case status.	B58	02062	MC2	0.50	\$299.25
03/14/2022	Add objector information to relevant paragraph in First Quarterly Fee Application.	B58	26059	ER	0.10	\$27.45
03/15/2022	Attend to e-mail with E. Rosen re: fee application.	B58	02062	MC2	0.10	\$59.85
03/15/2022	Revise Duty to Confer paragraph in First Quarterly Fee Application to reflect objection status [0.3]; revise certificate of service [0.2]; email with team re: same [0.1].	B58	26059	ER	0.60	\$164.70
03/16/2022	Review and revise fee application.	B58	02062	MC2	0.30	\$179.55
03/16/2022	Revise portions of 1st Quarterly Fee Application [0.4]; prepare same for electronic filing [0.2]; file and serve same [0.2]; review and receipt of as-filed versions of same [0.1]; coordinate service [0.2]; calculate and docket deadline [0.1]; email and confer with team re: same [0.1].	B58	26059	ER	1.30	\$356.85
03/21/2022	Telephone call with E. Rosen re: first interim fee order.	B58	02062	MC2	0.10	\$59.85
03/21/2022	Confer with D. Crapo re: first interim fee application and Young's inquiry on tolling letters.	B58	02062	MC2	0.10	\$59.85
03/21/2022	Review and receipt of Order Granting First Quarterly Fee Application [0.1]; compare to proposed order [0.1]; confer and email with team re: same [0.1]; email J. Curtis re: same [0.1].	B58	26059	ER	0.40	\$109.80
03/22/2022	Telephone call with E. Rosen re: preparation of 1st Quarter 2022 fee applications; draft e-mail to P. Eiden re: same.	B58	02062	MC2	0.10	\$59.85
	<b>Sub-Total For Task:</b>	<b>B58</b>	<b>Fee Applications</b>		<b>19.20</b>	<b>\$6,469.20</b>
01/12/2022	Telephone calls with SEC Counsel re: withdrawal of Stewart's counsel.	B56	02062	MC2	0.50	\$299.25
01/12/2022	Review attorney's motion for authorization to withdraw from representing Michael Stewart.	B56	02548	DC	0.10	\$59.85
01/12/2022	Review and respond to emails from M. Conlan re response to motion to withdraw from representation.	B56	02548	DC	0.20	\$119.70

**Gibbons P.C.**

Time Detail

Run Date: 5/4/2022

<b>Client/Matter:</b> 117199 106202	<b>Mark Conlan</b> <b>Counsel to Mark Conlan in his capacity as SEC Receiver</b>
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
01/17/2022	Review and revise Stewart motion to withdraw [0.1]; attend to e-mails with V. Drohan re: same [0.1].	B56	02062	MC2	0.20	\$119.70
	<b>Sub-Total For Task:</b>	<b>B56</b>			<b>1.00</b>	<b>\$598.50</b>
	<b>Employment Applications</b>					
01/04/2022	Conference call with D. Crapo, <b>REDACTED</b> re: case status and next steps (split).	B53	02062	MC2	0.40	\$239.40
01/04/2022	Draft detailed e-mails to D. Crapo, E. Rosen and D. Barney re: next steps.	B53	02062	MC2	0.30	\$179.55
01/13/2022	Review case docket.	B53	02062	MC2	0.20	\$119.70
01/14/2022	Confer with M. Conlan re contempt and insurance issues.	B53	02548	DC	0.20	\$119.70
01/18/2022	Update checklist to reflect latest developments.	B53	26059	ER	0.20	\$54.90
01/26/2022	Review Notice of Dishonor filed by M. Stewart.	B53	02062	MC2	0.10	\$59.85
02/01/2022	Telephone call with D. Crapo re: case status, next steps and open items.	B53	02062	MC2	0.50	\$299.25
02/02/2022	Review case dockets [0.1]; e-mails with D. Crapo and E. Rosen re: same [0.1].	B53	02062	MC2	0.20	\$119.70
02/02/2022	Review and receipt of Scheduling Order [0.1]; docket trial related deadlines from Scheduling Order [0.1].	B53	26059	ER	0.20	\$54.90
02/02/2022	Confer with M. Conlan re: recent developments.	B53	26059	ER	0.30	\$82.35
03/01/2022	Review McKenna Motion to Withdraw as counsel to SEC.	B53	02062	MC2	0.10	\$59.85
03/01/2022	Review latest notice from defendants Michael and Victoria Stewart.	B53	02548	DC	0.10	\$59.85
03/15/2022	Confer with D. Crapo re: open issues.	B53	02062	MC2	0.30	\$179.55
03/15/2022	Review and organize key document filings.	B53	26059	ER	0.20	\$54.90
03/23/2022	E-mails with <b>REDACTED</b> re: contact information for Mediatrix former CFO.	B53	02062	MC2	0.10	\$59.85
03/31/2022	Update parties and witness list.	B53	26059	ER	0.10	\$27.45
	<b>Sub-Total For Task:</b>	<b>B53</b>			<b>3.50</b>	<b>\$1,770.75</b>
	<b>Case Administration</b>					
01/12/2022	Attend to e-mails with V. Drohan re: motion to withdraw as counsel and insurance coverage on Scottsdale property.	B52	02062	MC2	0.20	\$119.70
01/12/2022	Telephone call with D. Crapo re: insurance on Scottsdale property.	B52	02062	MC2	0.10	\$59.85
01/13/2022	Emails to/from investor's broker Anthony Canci re procedural issues.	B52	02548	DC	0.10	\$59.85
01/14/2022	E-mails with V. Drohan and SEC team re: insurance on Scottsdale property.	B52	02062	MC2	0.10	\$59.85
01/14/2022	Telephone call with J. Wolak re: insurance issues [0.1]; draft memo to file re: same [0.2].	B52	02062	MC2	0.30	\$179.55
01/14/2022	Telephone conference with M. Conlan regarding insurance status and issues on property policies.	B52	00169	JTW	0.20	\$138.00
01/18/2022	Review proposed webpage [0.2]; draft memo re: suggested content and format changes [0.5]; email with team re: same [0.1].	B52	26059	ER	0.80	\$219.60
01/19/2022	Review sample receiver webpage [0.2]; email with team re: same and webpage considerations generally [0.1].	B52	26059	ER	0.30	\$82.35
01/24/2022	Prepare for call with G. Miller and M. Miller regarding Receivership website design [0.2]; review email from M. Miller re: same [0.2]; detailed email response to M. Miller re: same [0.3]; website design call with G. Miller and M. Miller [0.5]; provide additional data for website - contact info and sample news [0.6]; review revised proposed website design [0.1]; further email with G. Miller and M. Miller re: same [0.1].	B52	26059	ER	2.00	\$549.00
01/25/2022	Research status of recording of receivership appointment [0.3]; communicate with courts regarding same [0.2].	B52	26048	NM3	0.50	\$103.50
01/26/2022	Continue researching status of recording of receivership appointment [0.3]; communicate with courts regarding same [0.3].	B52	26048	NM3	0.60	\$124.20
01/27/2022	Review and revise draft e-mail to the Clerk for the Eastern District of Texas requesting docketing of appointment order.	B52	02062	MC2	0.10	\$59.85
01/27/2022	Compose response to court regarding recording of receivership appointment and M. Conlan request for receivership Order.	B52	26048	NM3	0.80	\$165.60
01/28/2022	Email with team and G. Miller re: status of website.	B52	26059	ER	0.10	\$27.45
01/31/2022	E-mail to investor counsel, <b>REDACTED</b> , re: cooperation.	B52	02548	DC	0.20	\$119.70
02/02/2022	Update Receivership website to add recent Substantive Filings [0.4]; revise case news [0.3]; add deadlines [0.2]; confer with M. Conlan re: website content, analytics, and logistics [0.4]; email with A. Jen re: redirecting prior website to successor website [0.1].	B52	26059	ER	1.40	\$384.30
02/02/2022	Confer with M. Conlan re: USDC EDTX response to request for docketed substitution notice.	B52	26059	ER	0.20	\$54.90
02/14/2022	Review and receipt of EastWest statement [0.1]; review and organize EastWest folder [0.1].	B52	26059	ER	0.20	\$54.90

**Gibbons P.C.**

Time Detail

Run Date: 5/4/2022

<b>Client/Matter:</b> 117199 106202	<b>Mark Conlan</b> <b>Counsel to Mark Conlan in his capacity as SEC Receiver</b>
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
02/18/2022	Review and organize investor correspondence [0.3]; email with team re: same [0.1].	B52	26059	ER	0.40	\$109.80
02/28/2022	Review and receipt of investor correspondence.	B52	26059	ER	0.20	\$54.90
02/28/2022	Email with M. Conlan re: update of Mediatrrix website [0.1]; draft post re: same [0.1].	B52	26059	ER	0.20	\$54.90
03/01/2022	Review and receipt of investor correspondence.	B52	26059	ER	0.10	\$27.45
03/04/2022	Review insurance report on powerboat [0.2]; investigate same [0.4].	B52	02518	DEB	0.60	\$359.10
03/07/2022	Review and receipt of recent East West bank statement; email with team re: same.	B52	26059	ER	0.10	\$27.45
03/08/2022	Participate in conference call with investors' counsel re: distributions from receivership.	B52	02548	DC	0.20	\$119.70
03/11/2022	Review and receipt of REDACTED investor correspondence.	B52	26059	ER	0.20	\$54.90
03/16/2022	Review Mediatrrix Capital formation documents; e-mails with E. Rosen re: same.	B52	02062	MC2	0.10	\$59.85
03/16/2022	Email with team re: new website post.	B52	26059	ER	0.10	\$27.45
03/17/2022	Add Case News and Substantive Pleadings posts to Mediatrrix website.	B52	26059	ER	0.40	\$109.80
03/21/2022	Add Case News and Substantive Pleadings posts to Mediatrrix website for Order Granting First Quarterly Fee Application.	B52	26059	ER	0.40	\$109.80
03/25/2022	Telephone with Clyde & Co. re: insurance payment for powerboat repair.	B52	02518	DEB	0.20	\$119.70
03/28/2022	Emails to/from J. Cunningham and M. Conlan re: invoice for M/V Currenseas repair.	B52	02518	DEB	0.60	\$359.10
03/28/2022	E-mails with D. Barney and J. Cunningham re: boat repair costs.	B52	02062	MC2	0.10	\$59.85
03/29/2022	E-mails with D. Barney re: insurance payment on damaged boat.	B52	02062	MC2	0.10	\$59.85
03/31/2022	Update Mediatrrix Receivership website [0.2]; email with team re: same [0.1].	B52	26059	ER	0.30	\$82.35
	<b>Sub-Total For Task:</b>	<b>B52</b>	<b>Business Operations</b>		<b>12.50</b>	<b>\$4,358.10</b>
01/05/2022	Attend to e-mails with J. Hankins and D. Crapo re: purchase and sale contract with REDACTED.	B51	02062	MC2	0.10	\$59.85
01/05/2022	Review and revise sale contract for 1197 Lloyd Rd. property.	B51	02548	DC	0.20	\$119.70
01/05/2022	Emails to/from M. Conlan and broker, James Hankins re sale contract.	B51	02548	DC	0.30	\$179.55
01/06/2022	Conference call with V. Drohan and D. Crapo re: withdrawal as counsel for M. Stewart, sale of 1197 Lloyds Road property and title for Bahamas boat.	B51	02062	MC2	0.50	\$299.25
01/06/2022	Attend to e-mails with J. Hankins re: 1197 Lloyds Road sale agreement.	B51	02062	MC2	0.10	\$59.85
01/11/2022	Email with team re: initial draft Sale Motion for Lloyds Road property.	B51	26059	ER	0.10	\$27.45
01/12/2022	Review and respond to email from James Hankins, broker, re sale of 1197 Lloyd Road Property [0.2]; emails to/from M. Conlan re same [0.1].	B51	02548	DC	0.30	\$179.55
01/13/2022	Telephone call with E. Rosen re: 1197 Lloyds Road sale motion.	B51	02062	MC2	0.10	\$59.85
01/13/2022	Draft portions of Sale Motion for 1197 Lloyds Road property [1.7]; email and confer with team re: same [0.1].	B51	26059	ER	1.80	\$494.10
01/14/2022	Telephone call with E. Rosen re: sale motion for 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$59.85
01/14/2022	Draft Sale Motion for Lloyds Road property with Declaration and Proposed Order [2.1]; confer with team re: same [0.1].	B51	26059	ER	2.20	\$603.90
01/18/2022	Review and revise sale motion for 1197 Lloyds Road property.	B51	02062	MC2	0.30	\$179.55
01/18/2022	Draft portions of Sale Motion for 1197 Lloyds Road.	B51	26059	ER	1.60	\$439.20
01/19/2022	Review and revise 1197 sale motion [0.9]; telephone call with E. Rosen re: same [0.1].	B51	02062	MC2	1.00	\$598.50
01/19/2022	Legal research on appraisal requirements for private sale.	B51	02062	MC2	0.40	\$239.40
01/19/2022	Emails to/from M. Conlan and from real estate broker re sale of 1197 Lloyd Road (Denton) property.	B51	02548	DC	0.50	\$299.25
01/19/2022	Research on 28 USC 2001 appraisal requirement for Sale Motion [0.3]; confer and email with team re: same [0.1].	B51	26059	ER	0.40	\$109.80
01/20/2022	Confer with M. Conlan re sale of 1197 Lloyd Road property.	B51	02548	DC	0.20	\$119.70
01/20/2022	Review emails to/from various parties re sale of 1197 Lloyd Road property.	B51	02548	DC	0.30	\$179.55
02/01/2022	Telephone call with J. Curtis re: tracing proceeds from boat sale.	B51	02062	MC2	0.10	\$59.85
02/02/2022	Confer with M. Conlan re: sale of 1197 Lloyd Road property.	B51	02548	DC	0.10	\$59.85
02/07/2022	E-mails to/from appraiser, Will Snyder, and M. Conlan re: sale of 1197 Lloyd Road property.	B51	02548	DC	0.20	\$119.70
02/10/2022	E-mails to/from M. Conlan re: sale of 1197 Lloyd Road property.	B51	02548	DC	0.10	\$59.85
02/10/2022	E-mails to from broker, James Hankins, re: sale of 1197 Lloyd Road property.	B51	02548	DC	0.10	\$59.85
02/17/2022	Confer with M. Conlan re: mechanics of sale of 1197 Lloyd Road property.	B51	02548	DC	0.20	\$119.70

**Gibbons P.C.**

Time Detail

Run Date: 5/4/2022

<b>Client/Matter:</b> 117199 106202	<b>Mark Conlan</b> <b>Counsel to Mark Conlan in his capacity as SEC Receiver</b>
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
02/23/2022	Attend to e-mails with D. Crapo and J. Hankins re: addendum to 1197 Lloyds Road sale contract.	B51	02062	MC2	0.10	\$59.85
02/23/2022	E-mails to/from James Hankins, broker, re: sale of 1197 Lloyd Rd Property.	B51	02548	DC	0.30	\$179.55
03/01/2022	Review latest draft of contract to sell the 1197 Lloyd Road property.	B51	02548	DC	0.10	\$59.85
03/04/2022	Confer with M. Conlan re: sale of 1197 Lloyd Road property.	B51	02548	DC	0.20	\$119.70
03/04/2022	E-mail to broker, James Hankins, re: timing of sale of 1197 Lloyd Road property.	B51	02548	DC	0.10	\$59.85
03/08/2022	Telephone call with D. Barney re: location and potential sale of 39' SeaVee motor yacht.	B51	02062	MC2	0.40	\$239.40
03/16/2022	Telephone with J. Cunningham re: Sale of powerboat.	B51	02518	DEB	0.30	\$179.55
03/21/2022	Review asset freeze orders, receivership appointment order and sworn asset accountings [0.5]; draft demand letter to M. Stewart for titles to vehicles [0.5].	B51	02062	MC2	1.00	\$598.50
03/25/2022	E-mail to Title Officer, Nancy Patterson, re: 1197 Lloyds Rd. deed to Bryant Sewall.	B51	02548	DC	0.10	\$59.85
03/28/2022	Attend to e-mails with J. Hankins and D. Crapo re: conveyance of 1197 Lloyds Road property out of trust.	B51	02062	MC2	0.10	\$59.85
03/28/2022	E-mails to/from M. Conlan and broker, James Hankins, re: sale of 1197 Lloyds Road property.	B51	02548	DC	0.30	\$179.55
03/29/2022	E-mails to/from title officer, Nancy Patterson, M. Conlan and broker, James Hankins, re: transfer of 1197 Lloyds Road property back into the name of Bryant Sewall.	B51	02548	DC	0.50	\$299.25
03/30/2022	Review draft deed for transfer of 1197 Lloyds Road Property to Bryant Sewall [0.1]; review e-mails from N. Patterson, D. Crapo and J. Hankins re: same [0.1].	B51	02062	MC2	0.20	\$119.70
03/30/2022	Review deed of 1197 Lloyds Road property back to Bryant Sewall.	B51	02548	DC	0.20	\$119.70
03/30/2022	E-mail to M. Conlan re: deed of 1197 Lloyds Road property back to Bryant Sewall.	B51	02548	DC	0.10	\$59.85
03/30/2022	E-mails to/from title officer, Nancy Patterson, re: deed of 1197 Lloyds Road property from Azimuth back to Bryant Sewall.	B51	02548	DC	0.10	\$59.85
03/30/2022	E-mail to Bryant Sewall's attorney, Vivian Drohan, re: deed of 1197 Lloyds Road property from Azimuth back to Bryant Sewall.	B51	02548	DC	0.10	\$59.85
03/30/2022	E-mail to broker, James Hankins, re: status of deed of 1197 Lloyds Road property from Azimuth back to Bryant Sewall.	B51	02548	DC	0.10	\$59.85
03/30/2022	Review offer of <b>REDACTED</b> for 1197 Lloyds Road property.	B51	02548	DC	0.10	\$59.85
	<b>Sub-Total For Task:</b>	<b>B51</b>	<b>Sale Motion/363 Sales</b>		<b>15.70</b>	<b>\$7,420.05</b>
01/04/2022	E-mails with V. Drohan re: open issues.	B50	02062	MC2	0.10	\$59.85
01/04/2022	E-mail to M. Conlan and E. Rosen re executed tolling agreement from James Roach.	B50	02548	DC	0.10	\$59.85
01/04/2022	Participate in conference call with SEC re status and next steps.	B50	02548	DC	0.80	\$478.80
01/04/2022	Review executed tolling agreement from James Roach.	B50	02548	DC	0.10	\$59.85
01/04/2022	Review document population for status of lis pendens and other information regarding Cottonwood and Arroyo properties as well as Arkonik wire transfers [0.4]; email with team re: same [0.1].	B50	26059	ER	0.50	\$137.25
01/04/2022	Email with team re: status of Asset Freeze Violator letters [0.1]; update Asset Freeze Violator list to reflect letters sent and signed agreement [0.1].	B50	26059	ER	0.20	\$54.90
01/05/2022	Review tolling agreements sent to alleged Asset Freeze Violators [0.1]; attend to e-mails with D. Crapo and E. Rosen re: same [0.1].	B50	02062	MC2	0.20	\$119.70
01/05/2022	Attend to e-mails with V. Drohan and D. Crapo re: insurance, purchase offer on Lloyds Road and title to boat.	B50	02062	MC2	0.10	\$59.85
01/05/2022	E-mails with D. Crapo and E. Rosen re: filing lis pendens [0.2] and tolling agreement with car vendor [0.2].	B50	02062	MC2	0.40	\$239.40
01/05/2022	Review and receipt of signed Philadelphia Archdiocese tolling agreement [0.1]; update chart re: same [0.1].	B50	26059	ER	0.20	\$54.90
01/06/2022	Attend to e-mails with D. Crapo re: net winners.	B50	02062	MC2	0.10	\$59.85
01/06/2022	Attend to e-mails with D. Crapo and J. Curtis re: net winner calculations.	B50	02062	MC2	0.10	\$59.85
01/06/2022	Email to broker, James Hankins, re 1179 Lloyd Rd. property [0.1]; emails to/ from counsel for recipient of charitable donations [0.1].	B50	02548	DC	0.10	\$59.85
01/06/2022	Participate in conference call with Vivian Drohan re status and property.	B50	02548	DC	0.50	\$299.25
01/06/2022	Email to broker, James Hankins, re 1179 Lloyd Rd. property.	B50	02548	DC	0.10	\$59.85
01/07/2022	Prepare for and participate in conference call with D. Crapo and J. Curtis re: net winner analysis.	B50	02062	MC2	0.40	\$239.40
01/07/2022	Confer with M. Conlan and Financial Advisor, John Curtis, re: Brokers and Net Winners.	B50	02548	DC	0.30	\$179.55
01/10/2022	Review and respond to e-mails from M. Conlan re insurance and tolling agreements.	B50	02548	DC	0.30	\$179.55
01/10/2022	Participate in conference call with SEC re status and next steps.	B50	02548	DC	0.80	\$478.80

**Gibbons P.C.**

Time Detail

Run Date: 5/4/2022

<b>Client/Matter:</b> 117199 106202	<b>Ma<sup>REDA</sup> Conlan</b> <b>Counsel to Mark Conlan in his capacity as SEC Receiver</b>
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
01/11/2022	Review Stewart Notice of Acceptance re: Tolling Agreement [0.1]; e-mails with D. Crapo and V. Drohan re: same [0.1].	B50	02062	MC2	0.20	\$119.70
01/11/2022	Due diligence on 39' SeaVee boat [0.4]; attend to e-mails with D. Barney re: same [0.2].	B50	02062	MC2	0.60	\$359.10
01/11/2022	Attend to e-mails with D. Crapo re: Stewart Tolling Agreement.	B50	02062	MC2	0.10	\$59.85
01/11/2022	Email to M. Conlan and E. Rosen re Stewart tolling agreement.	B50	02548	DC	0.20	\$119.70
01/11/2022	Review notice filed by Michael Stewart.	B50	02548	DC	0.30	\$179.55
01/12/2022	Attend to e-mails with J. Hankins and D. Crapo re: use of deed without warranty for Lloyds Road property.	B50	02062	MC2	0.10	\$59.85
01/12/2022	Review Drohan motion to withdraw; e-mails with D. Crapo re: same.	B50	02062	MC2	0.10	\$59.85
01/12/2022	Attend to e-mails with Arizona counsel re: recording lis pendens on 8082 E. Arroyo Hondo Road, Scottsdale, AZ property.	B50	02062	MC2	0.30	\$179.55
01/12/2022	Order motor vehicle searches from Library on various relief defendant entities.	B50	02062	MC2	0.20	\$119.70
01/12/2022	Confer with M. Conlan re Michael Stewart's residence in Scottsdale, AZ.	B50	02548	DC	0.20	\$119.70
01/12/2022	Review and respond to emails from M. Conlan re Michael Stewart's residence in Scottsdale, AZ.	B50	02548	DC	0.10	\$59.85
01/13/2022	Emails to/from M. Conlan re tolling agreement.	B50	02548	DC	0.10	\$59.85
01/14/2022	E-mails with REDACTED re: vehicles.	B50	02062	MC2	0.10	\$59.85
01/14/2022	Conference call with REDACTED re: vehicles.	B50	02062	MC2	0.50	\$299.25
01/14/2022	Telephone call with D. Crapo re: vehicles and asset freeze violations.	B50	02062	MC2	0.20	\$119.70
01/17/2022	Review and respond to e-mail from Kevin Judiscak re: lis pendens on Scottsdale property.	B50	02062	MC2	0.30	\$179.55
01/18/2022	Review Arkonik wire transfers [0.2]; draft e-mail to Arkonik requesting VIN number for missing Arkonik vehicle [0.1].	B50	02062	MC2	0.30	\$179.55
01/18/2022	E-mails with D. Crapo re: Shawn Stewart tolling request.	B50	02062	MC2	0.10	\$59.85
01/18/2022	Review and receipt of signed Asset Freeze Violator tolling agreement (Roach); review and receipt of return mail from Charity St. Antonio of Padua [0.1]; update tolling agreement status spreadsheets [0.1].	B50	26059	ER	0.20	\$54.90
01/19/2022	E-mails with J. Hankins re: appraisal requirement (split).	B50	02062	MC2	0.10	\$59.85
01/19/2022	Attend to e-mails with K. Judiscak re: recording lis pendens on Arroyo Hondo Road property.	B50	02062	MC2	0.20	\$119.70
01/20/2022	E-mails with E. Rosen and G. Caris re: filed lis pendens.	B50	02062	MC2	0.20	\$119.70
01/20/2022	Emails to/from Frank E. Stevenson of Locke, Lord and M. Conlan re appraisal of 1197 Lloyd Road property.	B50	02548	DC	0.20	\$119.70
01/26/2022	Review Court Notice.	B50	02548	DC	0.10	\$59.85
01/28/2022	E-mails to/from W. Snyder, appraiser, and M. Conlan re: 1197 Lloyd Road property.	B50	02548	DC	0.30	\$179.55
01/31/2022	Confer with M. Conlan re: status and strategy.	B50	02548	DC	0.30	\$179.55
02/01/2022	Review Stewart's Non-Negotiable Notice of Acceptance; e-mail same to D. Crapo.	B50	02062	MC2	0.10	\$59.85
02/01/2022	Review documents [0.6]; prepare for status call with D. Crapo [0.4].	B50	02062	MC2	1.00	\$598.50
02/01/2022	Confer with M. Conlan re: status and strategy.	B50	02548	DC	0.40	\$239.40
02/01/2022	E-mails to/from appraiser, Will Snyder, and broker, James Hankins, re: 1197 Lloyd Road property.	B50	02548	DC	0.20	\$119.70
02/02/2022	E-mails to/from appraiser, Will Snyder, re: 1197 Lloyd Road property.	B50	02548	DC	0.30	\$179.55
02/03/2022	Follow up re: appraisal of 1197 Lloyd Road property.	B50	02548	DC	0.10	\$59.85
02/08/2022	E-mails to/from M. Conlan, James Hankins (Broker) and appraiser re: 1197 Lloyd Road property.	B50	02548	DC	0.20	\$119.70
02/11/2022	Review correspondence from M. Stewart; draft follow-up e-mail to V. Drohan re: same.	B50	02062	MC2	0.10	\$59.85
02/11/2022	Confer with James Hankins, broker, and Jason Secrest, appraiser, re: best and highest use of 1197 Lloyd Road property.	B50	02548	DC	0.80	\$478.80
02/11/2022	E-mail to M. Conlan re: conference with broker and appraiser.	B50	02548	DC	0.20	\$119.70
02/11/2022	Review court filings.	B50	02548	DC	0.10	\$59.85
02/11/2022	Review information from Appraiser.	B50	02548	DC	0.10	\$59.85
02/14/2022	E-mails to/from broker for 1197 Lloyd Road property re valuation.	B50	02548	DC	0.10	\$59.85
02/14/2022	Confer with defendant's brother, Shawn Stewart, re: information.	B50	02548	DC	0.20	\$119.70
02/15/2022	E-mails to/from Shawn Stewart's current or former attorney, Tony Bingham, to confirm that Mr. Bingham is no longer representing Mr. Stewart [0.1]; advise M. Conlan re: same [0.1].	B50	02548	DC	0.20	\$119.70
02/16/2022	Review e-mails from broker and appraiser re: 1197 Lloyd Road property.	B50	02548	DC	0.30	\$179.55
02/17/2022	Telephone call with D. Crapo re: title to 1197 Lloyds Road property.	B50	02062	MC2	0.20	\$119.70

**Gibbons P.C.**

Time Detail

Run Date: 5/4/2022

<b>Client/Matter:</b> 117199 106202	<b>Mark Conlan</b> <b>Counsel to Mark Conlan in his capacity as SEC Receiver</b>
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
02/17/2022	Review and revise contract addendum for 1197 Lloyds Road [0.1]; confer with D. Crapo re: same [0.1].	B50	02062	MC2	0.30	\$179.55
02/17/2022	E-mails to/from broker James Hankins and appraiser Mike Tobin re: 1197 Lloyd Road property.	B50	02548	DC	0.20	\$119.70
02/18/2022	Telephone calls with D. Crapo, REDACTED and J. Hankins re: delivering title on 1197 Lloyds Road.	B50	02062	MC2	0.50	\$299.25
02/18/2022	Confer with Michael Tobin, appraiser, re: 1197 Lloyd Road property in Denton.	B50	02548	DC	0.20	\$119.70
02/18/2022	Confer with M. Conlan and Jeff Feldman of SEC re: 1197 Lloyd Road property.	B50	02548	DC	0.50	\$299.25
02/18/2022	Review Archdiocese of Denver Tolling Agreement.	B50	02548	DC	0.10	\$59.85
02/21/2022	Telephone call with J. Hankins, N. Patterson and D. Crapo re: clearing title to 1197 Lloyds Road Property.	B50	02062	MC2	0.40	\$239.40
02/21/2022	Participate in conference call with M. Conlan, broker James Hankins and title officer Nancy Patterson re: 1197 Lloyd Rd Property.	B50	02548	DC	0.40	\$239.40
02/22/2022	E-mail to Bryant Sewall's counsel, Vivian Drohan, re: 1197 Lloyd Road property.	B50	02548	DC	0.20	\$119.70
02/22/2022	Review and receipt of Denver Archdiocese tolling agreement [ 0.1]; update chart [0.1]; docket tolling agreement deadline for charities and Asset Freeze Violators [0.1].	B50	26059	ER	0.30	\$82.35
02/23/2022	E-mails to/from appraiser, Wil Snyder, re: appraisal of 1197 Lloyd Rd property.	B50	02548	DC	0.10	\$59.85
02/23/2022	Review executed tolling stipulations.	B50	02548	DC	0.10	\$59.85
02/28/2022	E-mails to/from M. Conlan re: provision for claims.	B50	02548	DC	0.10	\$59.85
03/01/2022	E-mail to the broker, James Hankins, re: 1197 Lloyd's Road property.	B50	02548	DC	0.10	\$59.85
03/01/2022	Review and receipt of tolling agreement from St. Thomas More Catholic Church; update chart re: same.	B50	26059	ER	0.10	\$27.45
03/02/2022	E-mail from broker, James Hankins, and to M. Conlan re: 1197 Lloyd's Road property.	B50	02548	DC	0.20	\$119.70
03/02/2022	E-mail to appraiser, Mike Tobin, re: 1197 Lloyd's Rd property.	B50	02548	DC	0.10	\$59.85
03/02/2022	Confer with M. Conlan re distributions.	B50	02548	DC	0.10	\$59.85
03/03/2022	E-mails to/from appraiser, Wil Snyder, re: 1197 Lloyd's road property.	B50	02548	DC	0.10	\$59.85
03/03/2022	Confer with Bryant Sewall's counsel, Vivian Drohan, re: 1197 Lloyd's Road Property.	B50	02548	DC	0.20	\$119.70
03/04/2022	E-mails to/from William Snyder re: his appraisal of 1197 Lloyd Rd. property.	B50	02548	DC	0.10	\$59.85
03/04/2022	Review and analyze Snyder appraisal.	B50	02548	DC	1.40	\$837.90
03/04/2022	E-mails to/from M. Conlan re: Snyder appraisal.	B50	02548	DC	0.20	\$119.70
03/04/2022	Telephone call with D. Crapo re: sale of 1197 Lloyds Road property.	B50	26059	ER	0.20	\$54.90
03/07/2022	E-mails to/from M. Conlan re: 1197 Lloyd Rd property.	B50	02548	DC	0.10	\$59.85
03/07/2022	E-mails to/from appraiser, Will Snyder, re: 1197 Lloyd Rd Property.	B50	02548	DC	0.10	\$59.85
03/07/2022	Review e-mail from broker, James Hankins, re: 1197 Lloyd Rd property.	B50	02548	DC	0.10	\$59.85
03/08/2022	Attend to e-mails with D. Barney and T. Ashmore re: 39' SeaVee Boat.	B50	02062	MC2	0.20	\$119.70
03/09/2022	Confer with M. Conlan re: confidentiality issues.	B50	02548	DC	0.10	\$59.85
03/14/2022	E-mails with D. Crapo re: tracking Arkonik Range Rover [0.1]; fact research re: same [0.1].	B50	02062	MC2	0.20	\$119.70
03/15/2022	Review e-mails from D. Crapo re: insurance on Greenwood Village property and appraisal on Lloyd's Road property.	B50	02062	MC2	0.10	\$59.85
03/15/2022	E-mail to M. Conlan re: appraisals.	B50	02548	DC	0.10	\$59.85
03/15/2022	Confer with M. Conlan re: next steps.	B50	02548	DC	0.30	\$179.55
03/15/2022	E-mail to broker, James Hankins, re: appraisal of 1197 Lloyd's Road property.	B50	02548	DC	0.10	\$59.85
03/15/2022	E-mails to/from John Di Pinto re: insurance on Young residence.	B50	02548	DC	0.10	\$59.85
03/16/2022	Draft e-mail to V. Drohan re: title to 39' SeaVee motor yacht.	B50	02062	MC2	0.10	\$59.85
03/16/2022	E-mail to M. Conlan re: appraisals.	B50	02548	DC	0.10	\$59.85
03/16/2022	Review and receipt of Bahamas entity corporate documentation; email with team re: same.	B50	26059	ER	0.10	\$27.45
03/21/2022	Telephone call with REDACTED re: titled motor vehicles.	B50	02062	MC2	0.60	\$359.10
03/21/2022	Draft e-mail to V. Drohan cc'ing letter to M. Stewart re: title to vehicles.	B50	02062	MC2	0.10	\$59.85
03/21/2022	Review e-mails from T. Ashmore and REDACTED re: tolling letters to charities [0.1]; draft follow-up e-mail to G. Caris re: same [0.1].	B50	02062	MC2	0.20	\$119.70
03/21/2022	E-mails to/from Michael Young's counsel, Tracy Ashmore, re: tolling letters.	B50	02548	DC	0.20	\$119.70
03/21/2022	Confer with M. Conlan re: procedural issues, asset recovery issues.	B50	02548	DC	0.40	\$239.40
03/21/2022	E-mails to/from M. Conlan re: procedural and asset recovery issues.	B50	02548	DC	0.20	\$119.70

**Gibbons P.C.**

Time Detail

Run Date: 5/4/2022

<b>Client/Matter:</b> 117199 106202	<b>Mark Conlan</b> <b>Counsel to Mark Conlan in his capacity as SEC Receiver</b>
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
03/22/2022	Telephone calls with E. Rosen re: tolling letters for net winners and brokers.	B50	02062	MC2	0.60	\$359.10
03/22/2022	Update Broker merge list [0.4]; omit de minimus [0.1]; prepare broker letter for customization [0.3].	B50	26059	ER	0.80	\$219.60
03/23/2022	Review and analyze net winner analysis from RMA [0.3]; confer with D. Crapo re: same [0.1]; telephone call to REDACTED re: missing investor information [0.3].	B50	02062	MC2	0.70	\$418.95
03/24/2022	Review and revise tolling letter to broker dealers [0.2]; e-mails with D. Crapo and E. Rosen re: same [0.1].	B50	02062	MC2	0.30	\$179.55
03/24/2022	E-mails to/from E. Rosen re: tolling letter to brokers and responses to tolling letters to charities.	B50	02548	DC	0.30	\$179.55
03/24/2022	Review M. Conlan's e-mail re: broker letters.	B50	02548	DC	0.10	\$59.85
03/24/2022	Review template for broker letters.	B50	02548	DC	0.20	\$119.70
03/24/2022	Customize broker letter [0.3]; email with team re: same [0.1].	B50	26059	ER	0.40	\$109.80
03/24/2022	Email with team re: status of charities' signed tolling agreements.	B50	26059	ER	0.10	\$27.45
03/25/2022	Review and revise draft tolling agreement for sales reps [0.2]; e-mails with E. Rosen and D. Crapo re: same [0.1].	B50	02062	MC2	0.30	\$179.55
03/25/2022	Telephone call with E. Rosen re: tolling letter to brokers.	B50	02062	MC2	0.10	\$59.85
03/25/2022	Attend to e-mails with J. Cunningham and D. Barney re: 39' SeaVee boat.	B50	02062	MC2	0.10	\$59.85
03/25/2022	E-mails to/from E. Rosen re: tolling letters.	B50	02548	DC	0.20	\$119.70
03/25/2022	E-mail to realtor, Michael Tobin, re: estimate of the Fair Market Value of 1197 Lloyds Rd.	B50	02548	DC	0.10	\$59.85
03/25/2022	Customize and quality control check 10 broker letters [1.4]; update tracking chart [0.2]; detailed email with and confer team re: same [0.5].	B50	26059	ER	2.10	\$576.45
03/25/2022	Research to confirm Cottonwood house owner [0.3]; confer and email with M. Conlan re: same [0.2].	B50	26059	ER	0.50	\$137.25
03/28/2022	Review and analyze asset search results for Keystone Business Trust, Weinzell LLC, Michael Stewart and Victoria Stewart [1.3]; draft detailed e-mail to Mr. & Mrs. Stewart demanding delivery of title documents [0.9].	B50	02062	MC2	2.20	\$1,316.70
03/28/2022	E-mails with E. Rosen re: tolling letters.	B50	02062	MC2	0.10	\$59.85
03/28/2022	Review search results for REDACTED [0.2]; draft detailed e-mail to REDACTED re: financial records [0.3].	B50	02062	MC2	0.50	\$299.25
03/28/2022	Attend to e-mails with Library re: motor vehicle searches.	B50	02062	MC2	0.10	\$59.85
03/28/2022	Review and receipt of 10 final broker letters [0.2]; update charity letter chart [0.1]; review and revise detailed list of Net Winners [0.6]; research email addresses [0.1]; detailed email and confer with team re: same [0.6]; docket deadlines re: same [0.1];	B50	26059	ER	1.70	\$466.65
03/29/2022	Fact research on assets.	B50	02062	MC2	0.10	\$59.85
03/29/2022	Telephone calls with E. Rosen re: tracing motor vehicle VINs.	B50	02062	MC2	0.20	\$119.70
03/29/2022	Review asset search results for Sandy Toes LLC	B50	02062	MC2	0.10	\$59.85
03/29/2022	Review and receipt of correspondence and documentation regarding assets.	B50	26059	ER	0.20	\$54.90
03/30/2022	Draft follow-up e-mail to REDACTED re: financial records.	B50	02062	MC2	0.10	\$59.85
03/30/2022	Follow up with recipients of tolling letters.	B50	02548	DC	0.20	\$119.70
03/30/2022	Confer with E. Rosen re: tolling letters to net winners.	B50	02548	DC	0.10	\$59.85
03/30/2022	Confer with D. Crapo re: contact information for tolling agreement letters.	B50	26059	ER	0.10	\$27.45
03/31/2022	Phone interview with REDACTED re: background.	B50	02062	MC2	0.70	\$418.95
03/31/2022	Update contact information for tolling agreement letters [0.8]; email with team re: same [0.1].	B50	26059	ER	0.90	\$247.05
<b>Sub-Total For Task:</b>		<b>B50</b>	<b>Asset Analysis and Recovery</b>		<b>39.50</b>	<b>\$20,854.35</b>

<b>Total For Matter:</b>	<b>106202</b>	<b>Counsel to Mark Conlan in his capacity a</b>	<b>142.30</b>	<b>\$66,621.00</b>
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<b>Totals For Client:</b>			<b>142.30</b>	<b>\$66,621.00</b>
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**Gibbons P.C.**

Time Summary  
Run Date: 5/4/2022

**Client/Matter:** 117199      **Mark Conlan**

<b>Atty Code</b>	<b>Initials</b>	<b>Attorney Name</b>	<b>Position</b>	<b>Hours</b>	<b>Avg Rate</b>	<b>Value</b>
02518	DEB	Barney, Dale E.	Director	10.20	\$598.50	\$6,104.70
02062	MC2	Conlan, Mark	Director	41.70	\$598.50	\$24,957.45
00169	JTW	Wolak, John T.	Director	0.20	\$690.00	\$138.00
02548	DC	Crapo, David	Counsel	33.30	\$598.50	\$19,930.05
26059	ER	Rosen, Ellen	Case Manager	55.00	\$274.50	\$15,097.50
26048	NM3	Mitchell, Neal	ParaLegal	1.90	\$207.00	\$393.30
<b>Totals:</b>				<b>142.30</b>		<b>\$66,621.00</b>

**Gibbons P.C.**

Fee Application  
Run Date: 5/4/2022

**Client/Matter:** 117199 Mark Conlan

<b>Task/ Code</b>	<b>Description Of Services</b>	<b>Hours</b>	<b>Value</b>
RE05	Status Reports	17.10	\$6,022.35
B62	Litigation	33.80	\$19,127.70
B58	Fee Applications	19.20	\$6,469.20
B56	Employment Applications	1.00	\$598.50
B53	Case Administration	3.50	\$1,770.75
B52	Business Operations	12.50	\$4,358.10
B51	Sale Motion/363 Sales	15.70	\$7,420.05
B50	Asset Analysis and Recovery	39.50	\$20,854.35
<b>Totals:</b>		<b>142.30</b>	<b>\$66,621.00</b>

**Gibbons P.C.**Fee Application  
Run Date: 5/4/2022

Client/Matter: 117199 Mark Conlan

Task Code	Description Of Services	Hours	Value
<b>RE05</b>	<b><u>Status Reports</u></b>		
	02062 Conlan, Mark	2.40	\$1,436.40
	02548 Crapo, David	1.70	\$1,017.45
	26059 Rosen, Ellen	13.00	\$3,568.50
<b>RE05</b>	<b>Status Reports</b>	<b>17.10</b>	<b>\$6,022.35</b>
<b>B62</b>	<b><u>Litigation</u></b>		
	02518 Barney, Dale E.	8.50	\$5,087.25
	02062 Conlan, Mark	12.60	\$7,541.10
	02548 Crapo, David	9.30	\$5,566.05
	26059 Rosen, Ellen	3.40	\$933.30
<b>B62</b>	<b>Litigation</b>	<b>33.80</b>	<b>\$19,127.70</b>
<b>B58</b>	<b><u>Fee Applications</u></b>		
	02062 Conlan, Mark	2.90	\$1,735.65
	02548 Crapo, David	0.80	\$478.80
	26059 Rosen, Ellen	15.50	\$4,254.75
<b>B58</b>	<b>Fee Applications</b>	<b>19.20</b>	<b>\$6,469.20</b>
<b>B56</b>	<b><u>Employment Applications</u></b>		
	02062 Conlan, Mark	0.70	\$418.95
	02548 Crapo, David	0.30	\$179.55
<b>B56</b>	<b>Employment Applications</b>	<b>1.00</b>	<b>\$598.50</b>
<b>B53</b>	<b><u>Case Administration</u></b>		
	02062 Conlan, Mark	2.20	\$1,316.70
	02548 Crapo, David	0.30	\$179.55
	26059 Rosen, Ellen	1.00	\$274.50
<b>B53</b>	<b>Case Administration</b>	<b>3.50</b>	<b>\$1,770.75</b>
<b>B52</b>	<b><u>Business Operations</u></b>		
	02518 Barney, Dale E.	1.40	\$837.90
	02062 Conlan, Mark	1.10	\$658.35
	02548 Crapo, David	0.50	\$299.25
	26048 Mitchell, Neal	1.90	\$393.30
	26059 Rosen, Ellen	7.40	\$2,031.30
	00169 Wolak, John T.	0.20	\$138.00
<b>B52</b>	<b>Business Operations</b>	<b>12.50</b>	<b>\$4,358.10</b>
<b>B51</b>	<b><u>Sale Motion/363 Sales</u></b>		
	02518 Barney, Dale E.	0.30	\$179.55
	02062 Conlan, Mark	4.50	\$2,693.25
	02548 Crapo, David	4.80	\$2,872.80
	26059 Rosen, Ellen	6.10	\$1,674.45
<b>B51</b>	<b>Sale Motion/363 Sales</b>	<b>15.70</b>	<b>\$7,420.05</b>
<b>B50</b>	<b><u>Asset Analysis and Recovery</u></b>		
	02062 Conlan, Mark	15.30	\$9,157.05
	02548 Crapo, David	15.60	\$9,336.60
	26059 Rosen, Ellen	8.60	\$2,360.70
<b>B50</b>	<b>Asset Analysis and Recovery</b>	<b>39.50</b>	<b>\$20,854.35</b>
<b>Totals:</b>		<b>142.30</b>	<b>\$66,621.00</b>

**Gibbons P.C.**

Disbursement Detail

Run Date: 5/4/2022

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

Tran Date	Description Of Disbursement	Value
<b><u>Disbursement Type:</u> Expedited Delivery Service (Federal Express)</b>		
11/17/2021	Expedited Delivery Service To: FEDEX: MARK B CONLAN, Esq, NEWARK NJ (Federal Express)	\$130.23
01/19/2022	Expedited Delivery Service To: FEDEX: Mark Conlan, SPARTA NJ (Federal Express)	\$41.48
	<b>Total: Expedited Delivery Service (Federal Express)</b>	<b>\$171.71</b>
<b><u>Disbursement Type:</u> Filing and Miscellaneous Fees</b>		
01/13/2022	Filing and Miscellaneous Fees Lexis Nexis Invoice Number 1008232-20220131 -1/31/22	\$9.03
01/13/2022	Filing and Miscellaneous Fees Lexis Nexis Invoice Number 1008232-20220131 -1/31/22	\$6.87
01/13/2022	Filing and Miscellaneous Fees Lexis Nexis Invoice Number 1008232-20220131 -1/31/22	\$41.84
01/13/2022	Filing and Miscellaneous Fees Lexis Nexis Invoice Number 1008232-20220131 -1/31/22	\$37.09
01/13/2022	Filing and Miscellaneous Fees Lexis Nexis Invoice Number 1008232-20220131 -1/31/22	\$25.74
01/13/2022	Filing and Miscellaneous Fees Lexis Nexis Invoice Number 1008232-20220131 -1/31/22	\$6.06
03/08/2022	Filing and Miscellaneous Fees Lexis Accurint Invoice No. 1008232-20220331 3/31/2022.	\$6.87
03/08/2022	Filing and Miscellaneous Fees Lexis Accurint Invoice No. 1008232-20220331 3/31/2022.	\$41.84
03/28/2022	Filing and Miscellaneous Fees Lexis Accurint Invoice No. 1008232-20220331 3/31/2022.	\$9.03
03/28/2022	Filing and Miscellaneous Fees Lexis Accurint Invoice No. 1008232-20220331 3/31/2022.	\$15.47
03/28/2022	Filing and Miscellaneous Fees Lexis Accurint Invoice No. 1008232-20220331 3/31/2022.	\$6.87
03/28/2022	Filing and Miscellaneous Fees Lexis Accurint Invoice No. 1008232-20220331 3/31/2022.	\$25.74
03/28/2022	Filing and Miscellaneous Fees Lexis Accurint Invoice No. 1008232-20220331 3/31/2022.	\$12.05
03/28/2022	Filing and Miscellaneous Fees Lexis Accurint Invoice No. 1008232-20220331 3/31/2022.	\$6.06
03/28/2022	Filing and Miscellaneous Fees Lexis Accurint Invoice No. 1008232-20220331 3/31/2022.	\$8.65
	<b>Total: Filing and Miscellaneous Fees</b>	<b>\$259.21</b>
<b><u>Disbursement Type:</u> Legal Research - Lexis</b>		
	<b>Total: Legal Research - Lexis</b>	<b>\$10.00</b>
<b><u>Disbursement Type:</u> Legal Research - PACER</b>		
	<b>Total: Legal Research - PACER</b>	<b>\$24.40</b>
<b>Total Disbursements:</b>		<b>\$465.32</b>

**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.

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**ORDER APPROVING AND AUTHORIZING PAYMENT OF  
RECEIVER’S AND PROFESSIONALS’ FEES AND COSTS  
FROM JANUARY 1, 2022 THROUGH MARCH 31, 2022**

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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 January 1, 2022 through March 31, 2022 [ECF No. \_\_\_\_] (the “Second Quarterly Fee Application”). The Court having reviewed and considered the Second Quarterly Fee Application and all pleadings and evidence filed in support thereof, and there being no opposition to the Second Quarterly Fee Application, and good cause appearing therefore, IT IS

ORDERED that:

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

2. The following fees and costs incurred in the Second Expense Period<sup>1</sup> from January 1, 2022 through the end of the first quarter of 2022, are hereby authorized to be paid from the assets in the receivership estate:

a. The Receiver's fees in the amount of \$4,130.00 plus the Receiver's costs in the amount of \$4.50 for a total of \$4,134.50; and

b. The Receiver's counsel, Gibbons P.C.'s fees of \$66,621.00 and Gibbons' costs of \$465.32 for a total of \$67,086.32; and

c. The Receiver's accountants, Rocky Mountain Advisory, LLC's, fees of \$9,045.00 and RMA's costs of \$224.12 for a total of \$9,269.12; and

d. The Original Receiver firm, Robb Evans and Associates, LLC's, fees totaling \$515.25; and

e. The Original Receiver's counsel at Barnes & Thornburg LLP's, fees of \$717.60.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2022.

BY THE COURT:

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RAYMOND P. MOORE  
United States District Judge

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Second Quarterly Fee Application.