

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

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

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD, *et al.*,

Relief Defendants.

**MOTION FOR ORDER APPROVING AND AUTHORIZING PAYMENT OF
RECEIVER'S AND PROFESSIONALS' FEES AND COSTS
FROM APRIL 1, 2022 THROUGH JUNE 30, 2022**

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 April 1, 2022 through the end of the quarter, June 30, 2022 (the "Third 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 \$4,235.00 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 \$116,148.30 and Gibbons' costs of \$96.91 for a total of \$116,245.21 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 \$17,050.00 and RMA's costs of \$111.24 for a total of \$17,161.24 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's firm Robb Evans and Associates, LLC's, ("Robb Evans") fees totaling \$616.95 and costs of \$0.53 for a total of \$617.48 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 \$1,375.40 and costs of \$10.00 for a total of \$1,385.40 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 third Quarterly Fee Application pursuant to the Receiver Order, and covers the Third Expense Period, from April 1, 2022 through June 30, 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 April 1, 2022 through June 30, 2022* [ECF No. 353] (the "Receiver's Third 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 required 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 has indicated that it has no objection to this Motion.

The Receiver provided a copy of this Quarterly Fee Application in advance to attorneys for the following defendants: Mediatrix Capital Inc., Blue Isle Markets Inc., Blue Isle Markets Ltd., Bryant E. Sewall, Hanna Ohonkova Sewall, Michael S. Young, Maria C. Young, Salve Regina Trust, West Beach LLC, TF Alliance LLC, Hase Haus LLC and Casa Conejo LLC as well as to

pro se defendants Michael S. Stewart and Victoria M. Stewart. No Defendants 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.

Asset Analysis and Recovery; Asset Disposition; Business Operations; and Case Administration

During this period 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 Third Expense Period concerned the real property assets, personal property assets, and avoidance claims.

The Receiver prepared and filed the Report of Receiver’s Activities from January 1, 2022 through March 31, 2022 and Motion for Order Approving and Authorizing Payment of Receiver’s and Professionals’ Fees and Costs from January 1, 2022 through March 31, 2022 both of which were approved.

The Receiver also has continued his successful efforts to obtain replacement homeowners insurance for the Youngs' residence in Greenwood Village, Colorado as well as lots in Port Charlotte, Florida and 1197 Lloyds Road in Little Elm, Texas.

To provide investors and other interested parties with timely information regarding the status of the receivership, the Receiver and his team established a website at www.mediatrixreceivership.com. One of the paraprofessionals of Receiver's counsel has updated 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.

1197 Lloyds Road, Oak Point, TX

The Receiver and his counsel have been working to facilitate the sale of 1197 Lloyds Road including working out re-vesting of the title in Mr. Sewall's name. Following the re-vesting of title, the Receiver's listing agent re-advertised the property for sale. A Sale Motion was drafted during the period and filed on July 19, 2022 [ECF 347]. That motion remains pending.

Litigation

In the Tenth Circuit Court of Appeals, case numbers 21-1061; 21-1075; and 21-1322, the Receiver and his counsel continued to monitor significant filings. On July 28, 2022 the Tenth Circuit affirmed the two district court orders that were appealed [ECF No. 351] and issued its mandate on the same day [ECF No. 352].

As noted in the Receiver's First Quarterly Status Report for 2022, there was a motion pending on the District Court docket regarding settlement with Equiti UK entitled *Motion to Modify Asset Freeze to Permit the Transfer of Funds, Including Certain Disputed Funds, from*

Equiti UK to the Receiver (the “Equiti Motion”) [ECF No. 295]. On May 18, 2022, an Order was entered granting the Equiti Motion [ECF No. 331]. The Receiver, his counsel and his accountants coordinated procedures for receipt of the Equiti funds in excess of \$11 million that were received on August 9, 2022.

On May 24, 2022, the Receiver filed his *Motion for (1) Authority to Pursue Certain Avoidance Claims and Asset Freeze Violations; and (2) Approval of Proposed Settlement Procedures* [ECF 332] (the “Avoidance Action Motion”) along with a Forthwith Motion. Advocacy of the Avoidance Action Motion included drafting and filing a 12-page reply in support on June 6, 2022 [ECF 340] that successfully responded to the Young’s opposition to the Action Motion. The Avoidance Action Motion was granted on June 9 [ECF 341].

A 21-page Complaint with 12 pages of attachments was filed against 10 broker defendants on June 14, 2022. Summonses were issued on June 23, 2022. Domestic and international service upon the defendants is in process.

In the interest of avoiding the costs of litigation, the Receiver’s counsel sent “demand letters” to each broker paid a fraudulent-based “Commission,” and to Net Winners that were paid more than they deposited (“Fictitious Profits”). Each demand letter includes the Broker’s or the Net Winner’s debits received from the Receivership Defendants, and includes settlement parameters and a draft settlement agreement. To date, the Receiver has since received 5 fully executed settlement agreements with Net Winners, totaling \$133,262.03, with another \$302,874.68 anticipated from two additional Net Winner settlements.

During this period the Receiver sent three reminder tolling letters to charitable organizations. To date, we have received signed tolling agreements from eight charities and one

alleged asset freeze violator. Demand letters have been prepared and mailed to eight additional alleged asset freeze violators. Additionally, demand letters to the charities including settlement offers are being prepared and will be mailed by August 15, 2022.

Further, the Receiver continues to identify and analyze data as well as perform legal research in support of potential avoidance actions, potential actions regarding certain vehicles and a 38' motor vessel, the "M/V Currenseas", and other personal property. During the period, the Receiver attempted to follow up on a demand letter to Michael Stewart for the titles of seven vehicles and also attempted to follow up with Mr. Stewart regarding an additional nine motor vehicle titles.

Having exhausted informal efforts, the Receiver ultimately filed a motion for an order to show cause why Mr. Stewart should not be held in contempt on May 24, 2022, which motion was granted by Judge Crews on July 12, 2022. [ECF No. 346]. The Receiver also propounded discovery requests to Michael Stewart during the period. Although Mr. Stewart continues to remain silent, the Receiver has continually reached out (via email and phone) to meet and confer in good faith regarding the multiple outstanding issues involving Mr. Stewart—to no avail. Mr. Stewart's response to the Order to Show Cause was due on July 22, 2022, but no response has been filed to date.

Further, the Receiver received certain financial records from a former financial Mediatrix employee. The Receiver also issued subpoenas and received records with information from third parties regarding assets.

Receiver's counsel have worked with the Receiver's accountants to identify Net Winners. The Receiver and Gibbons personnel continued their due diligence efforts to locate addresses for

certain potential net-winners with respect to the Mediatrix scheme. Demand letters were drafted and sent out to net winners. In addition a complaint against net winners has been drafted. We only anticipate filing that complaint if we cannot reach settlement with any particular net winner.

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 Third Expense Period were related to Receivership operations and included but are not limited to the following: preparation of Quarterly Report for the 1st Quarter of 2022; establish segregation account; communications with the Receiver and his counsel at Gibbons and with SEC personnel; review and verification of investor lists and contact information; receipt of funds; preparation of payments to vendors; forensic investigation; and work on tax-related matters. 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 Third 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 Third 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 June 30, 2022 and requested in the Motion. Based on the cash on hand reported in the Receiver's Third Report that was filed on July 29, 2022 [ECF 353], the Receivership Estate had \$12,394,266.87 on hand net of accrued and unpaid fees and costs totaling \$139,946.28.¹

CONCLUSION

The Receiver respectfully requests that the Court grant the Motion in its entirety, authorize and approve for payment all of the fees incurred by the Receiver and his professionals as well as minimal transition fees generated by Robb Evans and Barnes & Thornburg as set forth herein, and enter the proposed order submitted concurrently herewith.

¹ The current balance net of accrued fees is \$12,394,266.87.

Respectfully submitted,

Dated: September 13, 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 September 13 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:

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

Further, I certify that a copy of the foregoing will be served on September 14, 2022 upon the following non-CM/ECF participant by regular U.S. Mail: Aaron Stewart, 23800 North 73rd Place, Scottsdale, AZ 85255.

/s/ David N. Crapo

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

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

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD, *et al.*,

Relief Defendants.

**DECLARATION OF MARK B. CONLAN, ESQ., RECEIVER, IN SUPPORT OF THE
MOTION FOR ORDER APPROVING AND AUTHORIZING PAYMENT OF
RECEIVER'S AND PROFESSIONALS' FEES AND COSTS
FROM APRIL 1, 2022 THROUGH JUNE 30, 2022**

I, Mark B. Conlan, of full age, hereby declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

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 April 1, 2022 through June 30, 2022* (the "Third 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 Third Expense Period¹ 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 \$4,235.00 for the Third 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 \$17,050.00 and RMA's costs of \$111.24 for a total of \$17,161.24 for the Third Expense Period.

7. Attached hereto as Exhibit C is a true and correct copy of Original Receiver's firm, Robb Evans and Associates, LLC's, fees totaling \$616.95 plus costs of \$0.53 for a total of \$617.48 for the Third Expense Period.

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

8. Attached hereto as Exhibit D is a true and correct copy of Original Receiver's counsel, Barnes & Thornburg LLP's, ("Barnes & Thornburg") invoice for Barnes & Thornburg's fees of \$1,375.40 plus costs of \$10.00 for a total of \$1,385.40 for the Third Expense Period.

9. In accordance with the Receiver Order, I certify that the Third 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 Third 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 September 13, 2022 at Newark, New Jersey.

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

EXHIBIT A

Gibbons P.C.Time Detail
Run Date: 8/10/2022

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
04/28/2022	Review and analyze RMA financial statements for Q1 report [0.1]; e-mails with E. Rosen re: same [0.1].	RE05	02062	MC2	0.20	\$70.00
	Sub-Total For Task:	RE05			0.20	\$70.00
		Status Reports				
04/14/2022	Working session with M. Conforti and E. Rosen re: avoidance motion.	B62	02062	MC2	0.90	\$315.00
04/26/2022	Conference call with SEC, D. Barney and M. Conforti re: avoidance and contempt motions.	B62	02062	MC2	0.90	\$315.00
05/20/2022	Conference call with SEC Team re: Stewart Contempt Motion, Avoidance Motion, and website content.	B62	02062	MC2	0.50	\$175.00
06/06/2022	Revise letter to M. Stewart demanding turnover of rare coins purchased from Island Technologies bank account.	B62	02062	MC2	0.10	\$35.00
06/30/2022	Telephone call with R. D'Aloisio re: tracing LaVelle retainer.	B62	02062	MC2	0.20	\$70.00
	Sub-Total For Task:	B62			2.60	\$910.00
		Litigation				
04/15/2022	Attend to e-mails with G. Caris re: payment of Barnes & Thornburg and Robb Evans fee invoices [0.1]; review same [0.1].	B58	02062	MC2	0.20	\$70.00
	Sub-Total For Task:	B58			0.20	\$70.00
		Fee Applications				
05/02/2022	E-mails with D. Crapo and counsel for investor re: claims and distribution process.	B54	02062	MC2	0.10	\$35.00
	Sub-Total For Task:	B54			0.10	\$35.00
		Claims Administration and Objections				
04/05/2022	Telephone call with SEC counsel regarding case status.	B53	02062	MC2	0.30	\$105.00
05/13/2022	Attend to e-mails with SEC re: title company inquiry into Peoria property.	B53	02062	MC2	0.10	\$35.00
	Sub-Total For Task:	B53			0.40	\$140.00
		Case Administration				
04/04/2022	Draft follow-up e-mail to Harvey Topitz re: replacement insurance for Greenwood Village home.	B52	02062	MC2	0.10	\$35.00
04/05/2022	Review e-mail from H. Topitz re: information needed for insurance quote [0.1]; partially complete questionnaire [0.2]; draft follow-up e-mail to T. Ashmore re: completing missing information [0.1].	B52	02062	MC2	0.40	\$140.00
04/06/2022	E-mails with T. Ashmore re: homeowners insurance application.	B52	02062	MC2	0.10	\$35.00
04/06/2022	Attend to e-mails with G. Caris, A. Jen and R. Erekson re: payment of insurance invoices.	B52	02062	MC2	0.10	\$35.00
04/08/2022	Attend to e-mails with R. Erekson re: approving payment of Lee & Mason insurance bill.	B52	02062	MC2	0.10	\$35.00
04/12/2022	Attend to e-mails with J. DePinto, M. Young, D. Crapo and T. Ashmore re: replacement insurance for Greenwood Village location.	B52	02062	MC2	0.50	\$175.00
04/12/2022	E-mails with H. Topitz re: insurance coverage for Greenwood Village home.	B52	02062	MC2	0.20	\$70.00
04/12/2022	Telephone call with Harvey Topitz re: insurance policy for Greenwood Village home and jewelry rider.	B52	02062	MC2	0.30	\$105.00
04/13/2022	E-mails with J. DePinto re: insurance on Greenwood Village property.	B52	02062	MC2	0.10	\$35.00
04/13/2022	E-mails with D. Crapo re: insurance on Greenwood Village property.	B52	02062	MC2	0.10	\$35.00
04/16/2022	Attend to e-mails with D. Crapo re: Hase Haus data needed for homeowners policy.	B52	02062	MC2	0.10	\$35.00
04/18/2022	E-mails with D. Crapo re: obtaining Hase Haus corporate documents for Young insurance policy.	B52	02062	MC2	0.10	\$35.00
04/19/2022	Attending to e-mails with J. DePinto and R. Erekson re: insurance bill for Greenwood Village property.	B52	02062	MC2	0.20	\$70.00
04/21/2022	E-mails with R. Erekson re: approval of payment of Greenwood Village insurance.	B52	02062	MC2	0.10	\$35.00
04/25/2022	Attend to e-mails with T. Ashmore and J. DePinto re: Young insurance policy.	B52	02062	MC2	0.20	\$70.00
05/09/2022	Attend to e-mails with J. Hankins and R. Erekson re: reimbursement for lawn mowing.	B52	02062	MC2	0.10	\$35.00
05/10/2022	Attend to e-mails with G. Caris re: insurance issues.	B52	02062	MC2	0.10	\$35.00
05/12/2022	Attend to e-mails with R. Erekson re: approval of reimbursement check for J. Hankins.	B52	02062	MC2	0.10	\$35.00
05/18/2022	E-mails with E. Rosen re: changes to website content.	B52	02062	MC2	0.10	\$35.00
05/18/2022	Telephone call with W. McKinley re: insurance coverage for Florida and Texas parcels.	B52	02062	MC2	0.30	\$105.00
05/18/2022	Draft detailed e-mail to J. DePinto re: placing insurance on Florida lots.	B52	02062	MC2	0.20	\$70.00
05/18/2022	E-mails with J. Hankins re: insurance for Texas property.	B52	02062	MC2	0.10	\$35.00
05/18/2022	Telephone call with Mark Blackburn re: replacement insurance of Little Elm property.	B52	02062	MC2	0.10	\$35.00
05/18/2022	E-mails with G. Caris and A. Jen re: replacement insurance.	B52	02062	MC2	0.10	\$35.00

Gibbons P.C.

Time Detail

Run Date: 8/10/2022

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
05/19/2022	Telephone call and e-mails with Khara Schauer at We Insure re: coverage for Port Charlotte lots.	B52	02062	MC2	0.30	\$105.00
05/19/2022	E-mails with D. Crapo re: insurance coverage for 1197 Lloyds Road.	B52	02062	MC2	0.20	\$70.00
05/19/2022	E-mails with Mark Blackburn and D. Crapo re insurance for 1197 Lloyd's Road.	B52	02062	MC2	0.10	\$35.00
05/20/2022	Telephone call with E. Rosen re: FAQ section for webpage.	B52	02062	MC2	0.20	\$70.00
05/23/2022	E-mails with E. Rosen re: website content.	B52	02062	MC2	0.10	\$35.00
05/25/2022	Review recent pleadings posted on receivership website (0.1); telephone call with E. Rosen re: same (0.0).	B52	02062	MC2	0.10	\$35.00
05/26/2022	E-mails with investor T.C.	B52	02062	MC2	0.10	\$35.00
06/01/2022	Telephone call with D. Crapo re: insurance coverage for Lloyds Road property.	B52	02062	MC2	0.10	\$35.00
06/01/2022	Attending to e-mails with W. McKinley re: Florida insurance.	B52	02062	MC2	0.10	\$35.00
06/02/2022	E-mails with K. Schauer re: Port Charlotte insurance.	B52	02062	MC2	0.10	\$35.00
06/02/2022	Attending to insurance for Port Charlotte lots.	B52	02062	MC2	0.30	\$105.00
06/03/2022	E-mails with Mark Blackburn re: insurance for 1197 Lloyds Road property.	B52	02062	MC2	0.10	\$35.00
06/03/2022	E-mails with R. Erikson re: payment of insurance invoice for Florida lots.	B52	02062	MC2	0.10	\$35.00
06/07/2022	Review and sign insurance application for 1197 Lloyds Road property.	B52	02062	MC2	0.20	\$70.00
06/07/2022	E-mails with Mark Blackburn re: insurance for 1197 Lloyds Road property.	B52	02062	MC2	0.10	\$35.00
06/08/2022	E-mails with T. Ashmore re: notice of changes to Greenwood Village insurance policy, need for jewelry rider.	B52	02062	MC2	0.30	\$105.00
06/08/2022	E-mails with T. Ashmore and J. DePinto re: cost of jewelry rider.	B52	02062	MC2	0.10	\$35.00
06/08/2022	Review and approve payment to Express Subpoena for service of Coinbase subpoena.	B52	02062	MC2	0.10	\$35.00
06/08/2022	E-mails with G. Caris and K. Schauer re: insurance coverage for Florida and Texas [0.2]; e-mails with R. Erikson re: payment of April and May insurance invoices [0.1].	B52	02062	MC2	0.30	\$105.00
06/09/2022	Attend to e-mails with K. Schauer, G. Caris, A. Jen and T. Ashmore re: new Florida General Liability policy.	B52	02062	MC2	0.20	\$70.00
06/23/2022	Attend to invoice for grass cutting at 1197 Lloyds Road; e-mails with J. Hankins and R. Erikson re: same.	B52	02062	MC2	0.10	\$35.00
06/27/2022	E-mails with D. Crapo re: Equiti Wire transfer.	B52	02062	MC2	0.10	\$35.00
06/27/2022	Review and approve invoice from Guaranteed Subpoena.	B52	02062	MC2	0.10	\$35.00
	Sub-Total For Task:	B52	Business Operations		7.40	\$2,590.00
05/11/2022	Attend to e-mails with N. Patterson, D. Crapo, J. Hankins and V. Drohan re: 1197 Lloyds Road conveyance deed.	B51	02062	MC2	0.10	\$35.00
05/23/2022	E-mails with RMA re: segregating Equiti funds.	B51	02062	MC2	0.20	\$70.00
05/23/2022	E-mails with defendants and counsel re: disposition of Equiti funds.	B51	02062	MC2	0.20	\$70.00
06/27/2022	E-mails with R. Lean re: liquidation of Bitcoin balance.	B51	02062	MC2	0.10	\$35.00
	Sub-Total For Task:	B51	Sale Motion/363 Sales		0.60	\$210.00
04/19/2022	Attend to e-mails with D. Barney re: retention of appraiser to appraise 38' Sea Vee motor vessel.	B50	02062	MC2	0.10	\$35.00
05/25/2022	Fact research on missing coins and digital currencies.	B50	02062	MC2	0.30	\$105.00
06/03/2022	Telephone call with A. Mignone at International Coin Alliance in Minnesota re: \$68,000 in rare coin purchases [0.1]; e-mails with SEC re: same [0.1].	B50	02062	MC2	0.20	\$70.00
	Sub-Total For Task:	B50	Asset Analysis and Recovery		0.60	\$210.00
	Total For Matter:	106197	Mark Conlan in his capacity as SEC Recei		12.10	\$4,235.00
Totals For Client:					12.10	\$4,235.00

Gibbons P.C.

Time Summary
Run Date: 8/10/2022

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

Atty Code	Initials	Attorney Name	Position	Hours	Avg Rate	Value
02062	MC2	Conlan, Mark	Director	12.10	\$350.00	\$4,235.00
Totals:				12.10		\$4,235.00

Gibbons P.C.

Fee Application

Run Date: 8/10/2022

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

Task/ Code	Description Of Services	Hours	Value
RE05	Status Reports	0.20	\$70.00
B62	Litigation	2.60	\$910.00
B58	Fee Applications	0.20	\$70.00
B54	Claims Administration and Objections	0.10	\$35.00
B53	Case Administration	0.40	\$140.00
B52	Business Operations	7.40	\$2,590.00
B51	Sale Motion/363 Sales	0.60	\$210.00
B50	Asset Analysis and Recovery	0.60	\$210.00
Totals:		12.10	\$4,235.00

Gibbons P.C.Fee Application
Run Date: 8/10/2022

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

Task Code	Description Of Services	Hours	Value
RE05	<u>Status Reports</u>		
	02062 Conlan, Mark	0.20	\$70.00
RE05	Status Reports	0.20	\$70.00
B62	<u>Litigation</u>		
	02062 Conlan, Mark	2.60	\$910.00
B62	Litigation	2.60	\$910.00
B58	<u>Fee Applications</u>		
	02062 Conlan, Mark	0.20	\$70.00
B58	Fee Applications	0.20	\$70.00
B54	<u>Claims Administration and Objections</u>		
	02062 Conlan, Mark	0.10	\$35.00
B54	Claims Administration and Objections	0.10	\$35.00
B53	<u>Case Administration</u>		
	02062 Conlan, Mark	0.40	\$140.00
B53	Case Administration	0.40	\$140.00
B52	<u>Business Operations</u>		
	02062 Conlan, Mark	7.40	\$2,590.00
B52	Business Operations	7.40	\$2,590.00
B51	<u>Sale Motion/363 Sales</u>		
	02062 Conlan, Mark	0.60	\$210.00
B51	Sale Motion/363 Sales	0.60	\$210.00
B50	<u>Asset Analysis and Recovery</u>		
	02062 Conlan, Mark	0.60	\$210.00
B50	Asset Analysis and Recovery	0.60	\$210.00
Totals:		12.10	\$4,235.00

EXHIBIT B

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



July 07, 2022

Mark Conlan, Reciever
Gibbons Law Firm

Invoice Number: 15803

Invoice Period: 04-05-2022 - 06-30-2022

Payment Terms: Net 15

RE: Mediatrix Capital

SEC v. Mediatrix

Time Details

<u>Date</u>	<u>Staff Member</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<u>Accounting</u>					
05-23-2022	JHC	Set up new account to segregate large receipt of client funds and communicated with M. Conlan regarding the same.	0.40	315.00	126.00
			0.40		126.00
<u>Case Administration</u>					
04-18-2022	HD	Update QuickBooks with receipts and checks for Q1 (1.2). Prepare Q1 2022 report to be filed with the court (3.0).	4.20	230.00	966.00
04-19-2022	JHC	Reviewed quarterly report financial schedules, made various revisions and updates and prepared final schedules to send to receiver (1.8). Directed H. Denison in preparation of additional report for quarterly report (.3).	2.10	315.00	661.50
04-21-2022	HD	Reviewed outstanding invoices for professional and legal fees (1.4). Met with J. Curtis to ensure compliance with reporting guidelines (.2).	1.60	230.00	368.00
04-26-2022	JHC	Prepared, reviewed and revised exhibit for quarterly report showing accrued and unpaid professional fees and provided to receiver with other exhibits and explanatory email.	1.20	315.00	378.00
06-07-2022	HD	Updated QuickBooks for April 1 - June 7 and extracted April and May bank statements in preparation of Q2 filing.	0.60	230.00	138.00
06-24-2022	RE	Prepare check for lawn maintenance for the Lloyds Road property and document for the file.	0.20	90.00	18.00
06-30-2022	RE	Work on wire transfer request for Gibbons Second Quarter Fees.	0.80	90.00	72.00
			10.70		2,601.50

Date	Staff Member	Description	Hours	Rate	Amount
<u>Fee Applications</u>					
05-04-2022	JHC	Reviewed invoice for first quarter of 2022 and provided changes and revisions to R. Ereksen (.5). Finalized invoice and submitted to counsel for applications to Court (.3).	0.80	315.00	252.00
			0.80		252.00
<u>Forensic/Investigation</u>					
04-14-2022	JM	Analyzed payee and transaction comments provided by REDACTED and examined documents and information obtained to resolve outstanding questions.	0.90	240.00	216.00
04-21-2022	JM	Examined REDACTED comments and questions regarding certain payee and payors as well as analyzed bank transactions and documents obtained to provide answers to outstanding questions.	3.30	240.00	792.00
04-29-2022	JM	Analyzed the comments and questions of REDACTED and utilized documents obtained, including bank statements and non-financial documents provided, to provide answers to outstanding questions.	1.80	240.00	432.00
05-05-2022	JHC	Searched transaction data for potential cryptocurrency purchases (.5). Prepared summary of potential purchases or transactions involving Coinbase.com and other entities and sent to Receiver (.3).	0.80	315.00	252.00
05-13-2022	JM	Examined comments and questions from REDACTED and utilized data and information obtained to answer certain outstanding questions.	1.10	240.00	264.00
05-13-2022	JHC	Email communications with E. Rosen regarding needed reports for financial institutions on investor payments to obtain additional information.	0.30	315.00	94.50
05-16-2022	JHC	Queried data, reviewed results and prepared detailed reports of payments to financial institutions for eight potential investors receiving excess payments over deposits for M. Conlan for potential recovery actions (3.3). Searched for documents and bank records REDACTED to provide to Receiver and provided update regarding the same (.6).	3.90	315.00	1,228.50
05-23-2022	JHC	Email communications with M. Conlan regarding summary for mediation of assets of Young parties (.2). Reviewed email REDACTED summarizing assets as of an earlier date (.3).	0.50	315.00	157.50
05-24-2022	JHC	Prepared various detailed schedules of payments for potential recovery actions for various financial institutions likely to represent investor deposits and payments and submitted files to Receiver's office (3.1). Email communications with E. Rosen regarding detailed schedules (0.2). Prepared summary of funds held or frozen traceable to Young	3.90	315.00	1,228.50

Date	Staff Member	Description	Hours	Rate	Amount
<u>Forensic/Investigation</u>					
05-25-2022	JHC	defendants (0.6). Prepared summary of assets held or frozen by receivership traceable to the Young defendants (1.2). Reviewed accounting records, bank records and other receivership reports and documents to prepare summary of assets (1.1).	2.30	315.00	724.50
05-26-2022	JM	Prepared a memo describing the findings of investor details and name.	2.20	240.00	528.00
05-27-2022	JM	Prepared a memo describing the findings of investor details and name.	1.30	240.00	312.00
05-31-2022	JHC	Reviewed investor transaction analysis prepared by J. Messer and met to discuss findings and analysis (0.6). Reviewed M. Conlan email regarding analysis needed (0.3). Analyzed Mediatrix transactions relative to investor money and evidence supporting allegations and prepared various schedules and reports of the same (2.7).	3.60	315.00	1,134.00
06-01-2022	JHC	Reviewed email from M. Conlan and declaration of J. Felder and exhibits thereto provided relative to analysis of characteristics of alleged fraudulent activities (1.8). Analyzed transactions in main Mediatrix account over six month period, classified and summarized transactions and prepared preliminary analysis and summaries (.9). Prepared preliminary draft findings of characteristics of transactions of Mediatrix and provided the same to M. Conlan (1.2).	3.90	315.00	1,228.50
06-02-2022	JHC	Reviewed trading losses and recreated SEC exhibits calculating monthly trading losses and cumulative totals (1.4). Responded to M. Conlan regarding trading losses over discreet periods and overall (.3).	1.70	315.00	535.50
06-03-2022	JHC	Reviewed and responded to email communications from M. Conlan regarding subpoenas and investigative work (.3). Reviewed coin transactions related to email communications (.4).	0.70	315.00	220.50
06-13-2022	JHC	Call with M. Conlan and legal team regarding filing of avoidance actions and other recovery actions (.8). Prepared draft exhibit for complaint and requested comments (.3). Prepared exhibits showing cash disbursements to brokers and submitted to counsel for complaint (1.1).	2.20	315.00	693.00
06-14-2022	JHC	Analyzed transaction data to determine Mediatrix entities from which broker payments were made and provided information to M. Conlan.	0.70	315.00	220.50
06-15-2022	JHC	Prepared files and database queries for analysis by S. Ott (.7). Meeting with S. Ott regarding analysis of net winners (.4). Directed S. Ott in analysis of net winners (.3).	1.40	315.00	441.00
06-15-2022	SO	Review case summary with J. Curtis (.4). Analyzed data to prepare detailed reports of net winners, investigating additional potentially related transactions (3.7).	4.10	155.00	635.50

Date	Staff Member	Description	Hours	Rate	Amount
<u>Forensic/Investigation</u>					
06-16-2022	SO	Searched for and analyzed related investor accounts within database provided by client and prepared detailed reports of potential net winners.	1.60	155.00	248.00
06-22-2022	JHC	Reviewed net winner analyses by individual or entity, made revisions and prepared summaries for discussion with counsel.	1.40	315.00	441.00
06-24-2022	JHC	Reviewed and revised net winner analysis and submitted to counsel for review and discussion.	1.10	315.00	346.50
06-27-2022	SO	Analyzed bank transaction data and prepared detailed reports of potential net winners including identifying clients whose investment contributions are not accounted for.	4.60	155.00	713.00
			49.30		13,086.50
<u>Litigation Consulting</u>					
04-05-2022	GAM	Call with Receiver regarding net winner claims and jurisdiction issues; call with D. Barney regarding same.	0.40	425.00	170.00
04-21-2022	JHC	Prepared for call on avoidance actions through review of various files and investor summary (.9). Call with M. Conlan and D. Barney regarding avoidance actions, calculations and analysis of net winners and data for the same (.6). Discussed accrued and unpaid fees analysis with H. Denison (.3). Email communications with E. Rosen on quarterly report information (.2).	2.00	315.00	630.00
			2.40		800.00
<u>Tax Work</u>					
04-05-2022	HD	Prepared 2021 tax extension.	0.20	230.00	46.00
05-11-2022	HD	Research tax topics related to capitalizing property charges opposed to expensing (.4). Prepared tax return attachments (.2).	0.60	230.00	138.00
			0.80		184.00
			Total		17,050.00

Time Summary

Staff Member	Hours	Rate	Amount
Gil A. Miller	0.40	425.00	170.00
Heather Denison	7.20	230.00	1,656.00
Jennie Messer	10.60	240.00	2,544.00
John H. Curtis	34.90	315.00	10,993.50
Raani Ereksion	1.00	90.00	90.00
Saria Ott	10.30	155.00	1,596.50
Total	64.40		17,050.00

Expense Summary

Expense	Amount
Copies	2.10
PACER	22.30
Postage	3.71
Supplies - Tax Forms	83.13
Total Expenses	111.24

Total for this Invoice	17,161.24
Previous Invoice Balance	9,269.12
Total Amount to Pay as of 07-07-2022	26,430.36

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



Mark Conlan, Reciever
Gibbons Law Firm

July 07, 2022

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

Invoice Number: 15803
Invoice Period: 04-05-2022 - 06-30-2022

REMITTANCE COPY

RE: Mediatrix Capital

Fees	17,050.00
Expenses	111.24
Total for this Invoice	17,161.24
Previous Invoice Balance	9,269.12
Total Amount to Pay as of 07-07-2022	26,430.36

Project	Balance Due
Mediatrix Capital	26,430.36
Total Amount to Pay	26,430.36

Open Invoices and Credits

Date	Transaction	Project	Amount	Applied	Balance
05-04-2022	Invoice 15644	Mediatrix Capital	9,269.12		9,269.12
07-07-2022	Invoice 15803	Mediatrix Capital	17,161.24		17,161.24
				Balance	26,430.36

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 #
4/30/2022	Mediatrix21

Bill To
Mark Conlan Receiver of Mediatrix Capital

P.O. No.

Description	Qty	Rate	Amount
For professional services provided from 4/1/22 to 4/30/22 by: C. DeCius	0.1	121.50	12.15
Total			\$12.15

**Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
April-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	
Total	<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 : April-22
Financial Activity : Accounting/Auditing
Name : Carl DeCius

Date	Description	Hours
4/6/22	Prepare and forward insurance bills to new Receiver for processing.	0.10

Robb Evans & Associates LLC

11450 Sheldon Street
Sun Valley, CA 91352

Invoice

Date	Invoice #
5/31/2022	Mediatrix22

Bill To
Mark Conlan Receiver of Mediatrix Capital

P.O. No.

Description	Qty	Rate	Amount
For professional services provided from 5/1/22 to 5/31/22 by:			
A. Jen	0.5	342.00	171.00
C. DeCius	0.9	121.50	109.35
		Total	\$280.35

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
May-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	0.50	342	171.00
Claims Administration and Objections	-	342	-
Employee Benefits/ Pensions	-	342	-
Accounting/Auditing	-	342	-
Business Analysis	-	342	-
Corporate Finance	-	342	-
Data Analysis	-	342	-
Status Reports	-	342	-
Litigation Consulting	-	342	-
Forensic Accounting	-	342	-
Tax Issues	-	342	-
Valuation	-	342	-
		342	
Total	<u>0.50</u>		<u>171.00</u>

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

Date	Description	Hours
5/18/22	Discussion with G. Caris re : properties insurance questions from Receiver	0.30
5/18/22	Discussion with C. DeCius re : properties insurance	0.10
5/18/22	Read and reply emails from G. Caris re : properties insurance	0.10

**Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
May-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	0.90	121.5	109.35
Business Analysis	-	121.5	-
Corporate Finance	-	121.5	-
Data Analysis	-	121.5	-
Status Reports	-	121.5	-
Litigation Consulting	-	121.5	-
Forensic Accounting	-	121.5	-
Tax Issues	-	121.5	-
Valuation	-	121.5	-
		121.5	
Total	<u>0.90</u>		<u>109.35</u>

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

Date	Description	Hours
5/2/22	Review files and documents; transfer electronic files to archive.	0.30
5/10/22	Emails with G. Caris regarding property insurance coverage matters.	0.10
5/10/22	Review emails from new Receiver.	0.10
5/18/22	Phone call with associate regarding property insurance matters. Locate and forward insurance documents to new Receiver. Cancel existing coverage on CO property.	0.40

Robb Evans & Associates LLC

11450 Sheldon Street
Sun Valley, CA 91352

Invoice

Date	Invoice #
6/30/2022	Mediatrix23

Bill To
Mark Conlan Receiver of Mediatrix Capital

P.O. No.

Description	Qty	Rate	Amount
For professional services provided from 6/1/22 to 6/30/22 by:			
A. Jen	0.7	342.00	239.40
C. DeCius	0.7	121.50	85.05
		Total	\$324.45

**Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
June-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	0.70	342	239.40
Claims Administration and Objections	-	342	-
Employee Benefits/ Pensions	-	342	-
Accounting/Auditing	-	342	-
Business Analysis	-	342	-
Corporate Finance	-	342	-
Data Analysis	-	342	-
Status Reports	-	342	-
Litigation Consulting	-	342	-
Forensic Accounting	-	342	-
Tax Issues	-	342	-
Valuation	-	342	-
		342	
Total	<u>0.70</u>		<u>239.40</u>

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

Date	Description	Hours
6/8/22	Read multiple emails between G. Caris and Receiver re : insurance	0.00
6/8/22	Discussions with G. Caris and C. DeCius re : insurance issues	0.40
6/24/22	Read multiple emails between G. Caris and Receiver re : insurance	0.00
6/30/22	Read Court Order approved fees	0.10
6/30/22	Received insurance refund check, discussion with C. DeCius re : breakdown of the refund, forward refund information to G. Caris; endorse check and send to Receiver	0.20

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC et al.
June-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	0.70	121.5	85.05
Business Analysis	-	121.5	-
Corporate Finance	-	121.5	-
Data Analysis	-	121.5	-
Status Reports	-	121.5	-
Litigation Consulting	-	121.5	-
Forensic Accounting	-	121.5	-
Tax Issues	-	121.5	-
Valuation	-	121.5	-
		121.5	
Total	<u>0.70</u>		<u>85.05</u>

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

Date	Description	Hours
6/8/22	Emails and calls with associates and counsel regarding insurance matters. Forward billing documents. Phone call with agent to discuss.	0.40
6/22/22	Process remaining policy cancellations.	0.20
6/30/22	Review insurance refund details and advise associate.	0.10

Robb Evans & Associates LLC

11450 Sheldon Street
Sun Valley, CA 91352

Statement

Date

7/8/2022

To:

Brick Kane, Rec of Mediatrix Capital Fund

					Amount Due	Amount Enc.
					\$0.53	
Date	Transaction				Amount	Balance
05/19/2022	Due 07/08/2022. Stamps.com for 2/20/22-5/19/22				0.53	0.53
CURRENT	1-30 DAYS PAST DUE	31-60 DAYS PAST DUE	61-90 DAYS PAST DUE	OVER 90 DAYS PAST DUE	Amount Due	
0.53	0.00	0.00	0.00	0.00	\$0.53	

Print Date	Amount Paid	Quoted Ar Payment	Recipient	Origin Zip	Status	Tracking #	Carrier	Class Service	Cost Code	Weight	Ship Date
3/23/2022	\$0.53	\$0.53 Prepaid	ROCKY MOUNTAIN ADVISORY, Attention: RAANI EREKSON, 215 S STATE ST STE 550, SALT LAKE CITY, UT 84111, US	91352	Printed	00040202540536212766	USPS	First Class (R)	Mediatrix	0lb 1oz	3/23/2022

EXHIBIT D

BARNES & THORNBURG LLP

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

(310) 284-3880

Invoice 2609192

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

May 06, 2022
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

Fees for Services	\$	119.60
Other Charges	\$	<u>7.00</u>
TOTAL THIS INVOICE	\$	126.60

REMITTANCE



BARNES & THORNBURG LLP

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

(310) 284-3880

Invoice 2609192

Page 2

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

May 06, 2022
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

00061044-000026
MEDIATRIX CAPITAL, INC.

For legal services rendered in connection with the above matter for the period ending April 30, 2022 as described on the attached detail.

Fees for Services	\$	119.60
Other Charges	\$	7.00
TOTAL THIS INVOICE	\$	126.60

00061044-000026 ROBB EVANS & ASSOCIATES LLC

MEDIATRIX CAPITAL, INC.

CASE ADMINISTRATION

04/06/22	GOC	Analyzed e-mail from DeCius including monthly invoices for real property insurance; exchanged e-mails with Conlan regarding same.	0.10
04/15/22	GOC	Exchanged e-mails with A. Jen regarding bills to forward to Conlan (.2 NO CHARGE).	NO CHARGE
04/15/22	GOC	Prepared and sent e-mails to Conlan with invoices from Robb Evans and Barnes & Thornburg for inclusion in the next fee motion (.2 NO CHARGE).	NO CHARGE
04/15/22	GOC	Reviewed and redacted invoices before sending them to Conlan (.2 NO CHARGE).	NO CHARGE
04/18/22	GOC	Prepared and sent e-mail to A. Jen regarding website link.	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

Other Charges:

Pacer Court Filing System Charges 03/01/2022-03/31/2022	7.00		
		\$	7.00

BARNES & THORNBURG LLP

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

[REDACTED]
(310) 284-3880

Invoice 2621553

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

June 07, 2022
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

Fees for Services	\$	837.20
Other Charges	\$	<u>0.00</u>
TOTAL THIS INVOICE	\$	837.20

REMITTANCE

[REDACTED]

BARNES & THORNBURG LLP

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

(310) 284-3880

Invoice 2621553

Page 2

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

June 07, 2022
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

00061044-000026
MEDIATRIX CAPITAL, INC.

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

Fees for Services \$ 837.20

TOTAL THIS INVOICE \$ 837.20

00061044-000026 ROBB EVANS & ASSOCIATES LLC

Page 3

MEDIATRIX CAPITAL, INC.

CASE ADMINISTRATION

05/10/22	GOC	Exchanged e-mails with A. Jen and DeCius regarding timing of cancellation of insurance on various real estate and receiver's procurement of insurance for the Greenwood property.	0.20
05/10/22	GOC	Exchanged e-mails with Conlan regarding insurance invoices and coverage.	0.20
05/10/22	GOC	Reviewed latest report to ascertain status of insurance on properties.	0.20
05/11/22	GOC	Analyzed e-mail from Rosen with declaration pages from new insurance on Greenwood Village property and Jen's e-mail to DeCius regarding same.	0.10
05/18/22	GOC	Telephoned A. Jen regarding insurance issues and coverage.	0.30
05/18/22	GOC	Analyzed e-mail from Conlan regarding insurance; prepared and sent e-mail to A. Jen regarding same.	0.10
05/18/22	GOC	Analyzed e-mail from DeCius with certificates of insurance for Port Charlotte and Little Elm properties; exchanged e-mails with A. Jen regarding same.	0.20
05/19/22	GOC	Prepared and sent e-mail to Conlan regarding insurance policies for Port Charlotte and Little Elm properties.	0.10
05/27/22	GOC	Analyzed fee motion filed by Conlan (.2 NO CHARGE).	NO CHARGE

SEC140	CASE ADMINISTRATION	1.40
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Fees for Services Total	\$837.20
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	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Gary O. Caris	1.40	\$598.00	\$837.20
TOTALS	1.40		\$837.20

BARNES & THORNBURG LLP

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

(310) 284-3880

Invoice 2632499

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

July 07, 2022
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

Fees for Services	\$	418.60
Other Charges	\$	<u>3.00</u>
TOTAL THIS INVOICE	\$	421.60

REMITTANCE



BARNES & THORNBURG LLP

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

(310) 284-3880

Invoice 2632499

Page 2

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

July 07, 2022
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

00061044-000026
MEDIATRIX CAPITAL, INC.

For legal services rendered in connection with the above matter for the period ending June 30, 2022 as described on the attached detail.

Fees for Services	\$	418.60
Other Charges	\$	3.00
TOTAL THIS INVOICE	\$	421.60

00061044-000026 ROBB EVANS & ASSOCIATES LLC

MEDIATRIX CAPITAL, INC.

CASE ADMINISTRATION

06/08/22	GOC	Exchanged multiple e-mails with Conlan regarding insurance premiums and coverage; analyzed e-mail from Erektion to Conlan regarding premiums.	0.30
06/08/22	GOC	Analyzed multiple e-mails from DeCius regarding insurance premiums and coverage.	0.20
06/24/22	GOC	Analyzed e-mail from DeCius regarding insurance invoices; prepared and sent e-mail to Conlan regarding same; analyzed e-mail from Conlan to Erektion and Erektion to me regarding same.	0.20
06/30/22	GOC	Analyzed order granting fee motion for first quarter of 2022 (.1 NO CHARGE).	NO CHARGE

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

Other Charges:

Pacer Court Filing System Charges 3.00
05/01/2022-05/31/2022

\$ 3.00

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

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

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD, *et al.*,

Relief Defendants.

**DECLARATION OF DAVID N. CRAPO, ESQ., RECEIVER COUNSEL, IN SUPPORT
OF THE MOTION FOR ORDER APPROVING AND AUTHORIZING PAYMENT OF
RECEIVER'S AND PROFESSIONALS' FEES AND COSTS
FROM APRIL 1, 2022 THROUGH JUNE 30, 2022**

I, David N. Crapo, of full age, hereby declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

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 April 1, 2022 through June 30, 2022 (the "Third 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 \$116,148.30 plus costs of \$96.91 for a total of \$116,245.21 for the Third Expense Period¹.

5. In accordance with the Receiver Order, I certify that the Third 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 Third 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 September 13, 2022 at Newark, New Jersey.

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

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

EXHIBIT A

Gibbons P.C.Time Detail
Run Date: 8/10/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver for Mediatrix Capital Inc.,
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
06/01/2022	Wedex meeting with M. Conlan, D. Porteous and M. MacPhail re: Equiti claims.	RE06	02518	DEB	0.60	\$359.10
06/03/2022	Emails from M. Conlan and SEC re: additional personal property assets and asset freeze violations.	RE06	02518	DEB	0.50	\$299.25
06/07/2022	Review reply brief on motion to authorize avoidance claims.	RE06	02518	DEB	0.30	\$179.55
06/13/2022	Attend meeting with team re: avoidance actions.	RE06	02518	DEB	0.60	\$359.10
06/14/2022	Review emails from litigation team re: broker dealer avoidance actions (0.3); emails to team re: same (0.5).	RE06	02518	DEB	0.80	\$478.80
06/14/2022	Review/revise broker dealer fraudulent transfer complaint.	RE06	02518	DEB	0.60	\$359.10
	Sub-Total For Task:	RE06			3.40	\$2,034.90
						Litigation Consulting
04/18/2022	Email with M. Conlan and J. Curtis re: 1st Quarter 2022 Quarterly Report.	RE05	26059	ER	0.20	\$54.90
04/18/2022	Draft 1st Quarter 2022 Quarterly Report.	RE05	26059	ER	0.50	\$137.25
04/19/2022	Email with J. Curtis re: accrued fees data for 1st Quarter 2022 Quarterly Report.	RE05	26059	ER	0.10	\$27.45
04/20/2022	Draft 1st Quarter 2022 Quarterly Report [0.7]; confer with team re: same [0.1].	RE05	26059	ER	0.80	\$219.60
04/21/2022	Telephone call with E. Rosen re: Q1 Quarterly Report.	RE05	02062	MC2	0.10	\$59.85
04/21/2022	Draft 1st Quarter 2022 Quarterly Report [1.5]; confer with team re: same [0.1].	RE05	26059	ER	1.60	\$439.20
04/22/2022	Draft 1st Quarter 2022 Quarterly Report.	RE05	26059	ER	0.80	\$219.60
04/25/2022	E-mails with E. Rosen and D. Crapo re: Q1 Quarterly report.	RE05	02062	MC2	0.10	\$59.85
04/25/2022	Draft 1st Quarter 2022 Quarterly Report.	RE05	26059	ER	0.30	\$82.35
04/25/2022	Draft 1st Quarter 2022 Quarterly Report.	RE05	26059	ER	0.30	\$82.35
04/26/2022	E-mails to/from E. Rosen re: quarterly report.	RE05	02548	DC	0.20	\$119.70
04/26/2022	Review draft of quarterly report.	RE05	02548	DC	0.20	\$119.70
04/26/2022	Draft 1st Quarter 2022 Quarterly Report [0.8]; email with team re: same [0.1]; prepare Exhibit A for electronic filing [0.1]; email with J. Curtis re: same [0.1].	RE05	26059	ER	1.10	\$301.95
04/27/2022	Telephone call with E. Rosen re: Q1 Quarterly Report.	RE05	02062	MC2	0.10	\$59.85
04/27/2022	Confer with team re: draft 1st Quarter 2022 Quarterly Report [0.1]; detailed email with team re: same [0.1].	RE05	26059	ER	0.20	\$54.90
04/27/2022	Confer with team re: draft 1st Quarter 2022 Quarterly Report [0.1]; detailed email with team re: same [0.1].	RE05	26059	ER	0.20	\$54.90
04/28/2022	Review and revise Q1 Quarterly Report to Judge Moore.	RE05	02062	MC2	0.50	\$299.25
04/28/2022	Telephone call with E. Rosen re: Q1 Quarterly Report.	RE05	02062	MC2	0.40	\$239.40
04/28/2022	E-mails to/from E. Rosen and M. Conlan re: quarterly report.	RE05	02548	DC	0.30	\$179.55
04/28/2022	Review latest draft of quarterly report.	RE05	02548	DC	0.10	\$59.85
04/28/2022	Email with M. Conlan re: calculations in Exhibit A of draft 1st Quarter 2022 Quarterly Report [0.1]; draft portions of quarterly report [0.4]; confer with M. Conlan re: same [0.3]; review and receipt of appraisals [0.1]; email with team re: same [0.1].	RE05	26059	ER	1.00	\$274.50
04/29/2022	Review Q1 Quarterly Report, telephone call with E. Rosen re: same.	RE05	02062	MC2	0.20	\$119.70
04/29/2022	Attend to e-mails with E. Rosen re: service of Q1 Quarterly Report.	RE05	02062	MC2	0.10	\$59.85
04/29/2022	Draft portions of quarterly report [0.1]; confer with M. Conlan re: same [0.1]; draft Certificate of Service [0.1]; prepare quarterly report with exhibits and Certificate of Service for electronic filing [0.1]; file and serve same [0.1]; review and receipt of as-filed versions of same [0.1]; coordinate service of same [0.1]; email with team re: service [0.1].	RE05	26059	ER	0.80	\$219.60
	Sub-Total For Task:	RE05			10.20	\$3,545.10
						Status Reports
04/01/2022	Telephone with J. Cunningham re: M/V Currenseas.	B62	02518	DEB	0.30	\$179.55
04/01/2022	Telephone call with E. Rosen re: investor list.	B62	02062	MC2	0.20	\$119.70
04/01/2022	Review and analyze sample motion and supporting exhibits for leave to commence net winner settlement program.	B62	02062	MC2	0.80	\$478.80
04/04/2022	Conferred with M. Conlan regarding potential avoidance action claims.	B62	30541	MAC	0.60	\$197.10
04/04/2022	Review pleadings, including complaint and declaration thereto, along with exhibits, for purposes of pursuing avoidance claims, if any.	B62	30541	MAC	2.80	\$919.80
04/04/2022	Confer with M. Conforti re: potential litigation claims.	B62	02062	MC2	0.60	\$359.10
04/05/2022	Emails to/from appraiser and M. Conlan re: M/V Currenseas appraisal.	B62	02518	DEB	0.30	\$179.55

Gibbons P.C.Time Detail
Run Date: 8/10/2022

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
04/05/2022	Legal research on 10th Circuit case law regarding approving settlements in support of Avoidance Action Motion.	B62	30541	MAC	5.30	\$1,741.05
04/05/2022	Drafting motion to seek court authority to pursue avoidance actions.	B62	30541	MAC	1.90	\$624.15
04/05/2022	Confer with M. Conforti and D. Crapo re: motion for leave to bring avoidance action claims.	B62	02062	MC2	0.60	\$359.10
04/05/2022	Telephone call with G. Miller and M. Conforti re: avoidance claims.	B62	02062	MC2	0.20	\$119.70
04/05/2022	Attend to e-mails with N. Nesvig re: net winner claims.	B62	02062	MC2	0.30	\$179.55
04/05/2022	Legal research on contempt motion.	B62	02062	MC2	0.30	\$179.55
04/05/2022	Confer with M. Conlan and M. Conforti re: jurisdictional issues in actions against net winners.	B62	02548	DC	0.30	\$179.55
04/06/2022	Legal research regarding potential fraudulent transfer claims.	B62	30541	MAC	0.50	\$164.25
04/06/2022	Legal research in support of Avoidance Action Motion.	B62	30541	MAC	1.50	\$492.75
04/06/2022	Drafting motion for authority to pursue avoidance claims, including the Conlan Declaration thereto.	B62	30541	MAC	5.60	\$1,839.60
04/06/2022	E-mails with SEC counsel and E. Rosen re: net winners.	B62	02062	MC2	0.10	\$59.85
04/06/2022	Telephone call with E. Rosen and SEC counsel re: net winners.	B62	02062	MC2	0.60	\$359.10
04/06/2022	Conference call with SEC counsel regarding Net Winners data.	B62	26059	ER	0.60	\$164.70
04/07/2022	Finalized initial draft of Avoidance Motion and supporting Declaration.	B62	30541	MAC	1.20	\$394.20
04/07/2022	Drafting form of settlement agreement as exhibit to Avoidance Motion.	B62	30541	MAC	0.60	\$197.10
04/07/2022	E-mails with E. Rosen re: due diligence on net winners.	B62	02062	MC2	0.20	\$119.70
04/07/2022	Update Net Winners spreadsheet data per conference call with SEC counsel [1.3]; email with M. Conlan re: same [0.1].	B62	26059	ER	1.40	\$384.30
04/08/2022	Finished drafting form of settlement agreement as exhibit to Avoidance Motion.	B62	30541	MAC	2.30	\$755.55
04/08/2022	Telephone call with E. Rosen re: net winner due diligence.	B62	02062	MC2	0.30	\$179.55
04/08/2022	Confer with M. Conlan re: Net Winners data.	B62	26059	ER	0.30	\$82.35
04/11/2022	Draft proposed form of Stipulated Judgment as exhibit to Avoidance Motion.	B62	30541	MAC	0.80	\$262.80
04/11/2022	Draft proposed order to be included with Avoidance Motion.	B62	30541	MAC	0.40	\$131.40
04/11/2022	Revise and edit Motion for Authority to Pursue Avoidance Claims and related pleadings.	B62	30541	MAC	2.00	\$657.00
04/11/2022	Legal research in support of Avoidance Motion.	B62	30541	MAC	0.60	\$197.10
04/11/2022	Review and revise Motion for Authority to Bring Avoidance Claims.	B62	02062	MC2	1.80	\$1,077.30
04/12/2022	Review and revise Motion for Authority to Bring Avoidance Claims.	B62	02062	MC2	1.80	\$1,077.30
04/13/2022	Research re: location of and appraisal of M/V Currenseas.	B62	02518	DEB	0.70	\$418.95
04/13/2022	Emails to/from M. Conlan and appraiser re: appraisal of M/V Currenseas.	B62	02518	DEB	0.30	\$179.55
04/13/2022	Discuss Avoidance Motion with M. Conlan.	B62	30541	MAC	0.40	\$131.40
04/13/2022	Telephone call with J. Curtis at RMA re: service addresses for Avoidance Action Motion.	B62	02062	MC2	0.10	\$59.85
04/13/2022	Continue review and revision of Motion for Authority to Bring Avoidance Claims and related pleadings.	B62	02062	MC2	1.40	\$837.90
04/13/2022	Confer with M. Conforti re: avoidance action motion.	B62	02062	MC2	0.40	\$239.40
04/13/2022	Review and revise brief in support of Avoidance Action Motion.	B62	02062	MC2	0.90	\$538.65
04/13/2022	Email with team and J. Curtis re: Net Winners spreadsheet.	B62	26059	ER	0.20	\$54.90
04/13/2022	Email with M. Conlan re: teams call regarding service.	B62	26059	ER	0.10	\$27.45
04/14/2022	Call with E. Rosen and M. Conlan discussing case needs [0.3]; Net Winners service considerations [0.2]; the asset freeze violations [0.2]; and motion for leave papers, including next steps to complete that motion [0.2].	B62	30541	MAC	0.90	\$295.65
04/14/2022	Review and revise Avoidance Motion.	B62	30541	MAC	2.40	\$788.40
04/14/2022	Draft a separate Broker-specific form settlement agreement for inclusion with Avoidance Motion.	B62	30541	MAC	1.00	\$328.50
04/14/2022	Legal research on avoidance of broker commissions.	B62	30541	MAC	0.30	\$98.55
04/14/2022	Drafting motion papers for Motion for Forthwith Hearing on the Avoidance Motion.	B62	30541	MAC	1.20	\$394.20
04/14/2022	Review broker documents.	B62	02062	MC2	0.50	\$299.25
04/14/2022	Meeting with M. Conlan and M. Conforti re: service considerations [0.7]; email with team re: same [0.2].	B62	26059	ER	0.90	\$247.05
04/14/2022	Summary review of Robb Evans database [0.5]; generate report [0.2]; confer and detailed email with team re: same [0.3].	B62	26059	ER	1.00	\$274.50

Gibbons P.C.

Time Detail

Run Date: 8/10/2022

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
04/15/2022	Finished drafting motion papers for Motion for Forthwith Hearing on Avoidance Motion.	B62	30541	MAC	0.70	\$229.95
04/18/2022	Review and revise forthwith hearing motion, declaration and proposed form of order [0.5]; e-mails with M. Conforti re: same [0.1].	B62	02062	MC2	0.60	\$359.10
04/18/2022	Review and revise Avoidance Action Motion and related pleadings.	B62	02062	MC2	1.50	\$897.75
04/18/2022	Telephone call with M. Conforti re: avoidance action motion.	B62	02062	MC2	0.20	\$119.70
04/19/2022	Draft email to SEC counsel re: M/V Currenseas appraisal.	B62	02518	DEB	0.90	\$538.65
04/19/2022	Review motion authorizing filing of fraudulent transfer actions.	B62	02518	DEB	1.50	\$897.75
04/19/2022	Edit and revise Motion for Forthwith Hearing on the Avoidance Action Motion.	B62	30541	MAC	0.50	\$164.25
04/19/2022	Review and revise Avoidance Motion.	B62	30541	MAC	1.60	\$525.60
04/19/2022	Attend to e-mails re: Avoidance Motion.	B62	30541	MAC	0.20	\$65.70
04/19/2022	Telephone call with M. Conforti re: circulating draft Avoidance Action Motion to parties in interest.	B62	02062	MC2	0.10	\$59.85
04/19/2022	Revise draft Avoidance Action Motion [0.5]; circulate same to SEC per L.R. 7.1(a) [0.1].	B62	02062	MC2	0.60	\$359.10
04/19/2022	E-mails with D. Barney and M. Conforti re: changes to Avoidance Action Motion.	B62	02062	MC2	0.10	\$59.85
04/19/2022	Telephone call with SEC counsel re: Avoidance Action Motion.	B62	02062	MC2	0.50	\$299.25
04/19/2022	Verify avoidance claim facts [0.3]; confer and email with team re: list of potential avoidance action claims [0.1]; detailed email with team re: avoidance action statistics [0.1].	B62	26059	ER	0.50	\$137.25
04/20/2022	Review/revise Avoidance Actions Procedures Motion and Forthwith Motion.	B62	02518	DEB	1.30	\$778.05
04/20/2022	Review and revise Motion for Authority to Bring Avoidance Action Motion.	B62	30541	MAC	0.60	\$197.10
04/20/2022	Legal research in support of Avoidance Action Motion.	B62	30541	MAC	0.40	\$131.40
04/20/2022	Review multiple "Notices of Dishonor" from M. Stewart.	B62	02062	MC2	0.10	\$59.85
04/20/2022	Draft e-mail to M. Stewart requesting telephone call.	B62	02062	MC2	0.10	\$59.85
04/20/2022	Draft e-mail to SEC counsel re: Avoidance Action Motion.	B62	02062	MC2	0.10	\$59.85
04/20/2022	E-mails with M. Conforti re: Avoidance Action Motion.	B62	02062	MC2	0.10	\$59.85
04/21/2022	Confer with M. Conlan re: proofs on avoidance action claims.	B62	02518	DEB	0.30	\$179.55
04/21/2022	Review and revise brief in support of Motion for Authority to Bring Avoidance Actions.	B62	30541	MAC	0.30	\$98.55
04/21/2022	Legal research in support of Avoidance Action Motion.	B62	30541	MAC	0.50	\$164.25
04/21/2022	Telephone call with SEC counsel re: Avoidance Action Motion.	B62	02062	MC2	0.20	\$119.70
04/21/2022	Conference call with SEC counsel and D. Barney re: 38' motor vessel and Avoidance Action Motion.	B62	02062	MC2	0.70	\$418.95
04/21/2022	Teams call with D. Barney and J. Curtis re: net winner data.	B62	02062	MC2	0.50	\$299.25
04/21/2022	Draft e-mail to parties pursuant to Local Rule 7.1(a) re: Avoidance Action Motion.	B62	02062	MC2	0.20	\$119.70
04/21/2022	Telephone call with D. Barney re: Avoidance Action Motion.	B62	02062	MC2	0.30	\$179.55
04/21/2022	E-mails with J. Curtis and D. Barney re: Avoidance Action Motion.	B62	02062	MC2	0.10	\$59.85
04/22/2022	Review settlement on M/V Currenseas repair [0.4]; investigate background [0.5]; telephone call with insurance brokers [0.4].	B62	02518	DEB	1.30	\$778.05
04/22/2022	Legal research in support of Stewart contempt motion.	B62	30541	MAC	1.20	\$394.20
04/22/2022	Working on Stewart contempt motion.	B62	30541	MAC	2.80	\$919.80
04/22/2022	Begin review of Brief in Support of Avoidance Action Motion, including recoveries for breaches of asset freeze order and approval of settlement procedures.	B62	02548	DC	0.10	\$59.85
04/25/2022	Drafting Stewart contempt motion.	B62	30541	MAC	1.90	\$624.15
04/25/2022	Drafting ancillary documents, including Conlan Declaration in support of Stewart contempt motion.	B62	30541	MAC	0.50	\$164.25
04/25/2022	E-mails with D. Barney re: investigating possible third party claims.	B62	02062	MC2	0.10	\$59.85
04/26/2022	Telephone w/ M. Conlan and SEC counsel re: motion on avoidance actions and investigation status.	B62	02518	DEB	0.80	\$478.80
04/26/2022	Working on Stewart contempt motion.	B62	30541	MAC	2.10	\$689.85
04/26/2022	Finalize ancillary documents in support of Stewart motion for Order to Show Cause, including supporting Declaration.	B62	30541	MAC	0.70	\$229.95
04/26/2022	Conduct meet and confer with SEC counsel regarding the Receiver's proposed Avoidance Motion.	B62	30541	MAC	0.80	\$262.80
04/26/2022	Review and revise draft brief in support of Avoidance Motion and related pleadings.	B62	30541	MAC	0.70	\$229.95
04/26/2022	Review and revise Stewart Contempt Motion.	B62	02062	MC2	0.40	\$239.40

Gibbons P.C.

Time Detail

Run Date: 8/10/2022

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
04/26/2022	Further revisions to Avoidance Action Motion.	B62	02062	MC2	0.20	\$119.70
04/26/2022	Confer with M. Conforti re: Stewart Contempt Motion.	B62	02062	MC2	0.10	\$59.85
04/27/2022	Investigate insurance settlement agreement on M/V Currenseas.	B62	02518	DEB	1.20	\$718.20
04/27/2022	Final edits and revisions to draft contempt motion.	B62	30541	MAC	1.00	\$328.50
04/27/2022	Research Colorado procedural rules re: Stewart contempt motion.	B62	30541	MAC	0.40	\$131.40
04/27/2022	Review and revise Stewart contempt motion.	B62	02062	MC2	0.90	\$538.65
04/28/2022	Review and revise Stewart contempt motion (0.4); e-mail same to SEC counsel and D. Crapo (0.1).	B62	02062	MC2	0.50	\$299.25
05/03/2022	Fact research for Stewart contempt motion.	B62	30541	MAC	0.40	\$131.40
05/03/2022	Revise Stewart Order to Show Cause.	B62	30541	MAC	1.40	\$459.90
05/03/2022	Telephone call with M. Conforti re: Stewart Contempt motion.	B62	02062	MC2	0.10	\$59.85
05/03/2022	Telephone call M. Conforti re: Stewart Contempt Motion.	B62	02062	MC2	0.60	\$359.10
05/04/2022	Emails to/from M. Conlan re: conference call re: potential claims against Equiti.	B62	02518	DEB	0.30	\$179.55
05/04/2022	Final edits and revisions to Stewart contempt motion, including additional exhibits based on recent correspondence from Mr Stewart.	B62	30541	MAC	0.40	\$131.40
05/04/2022	Review three "Notices of Dishonor" from M. Stewart.	B62	02062	MC2	0.10	\$59.85
05/04/2022	Review and revise Stewart Contempt Motion, Notice of Motion, supporting declaration and proposed form of order.	B62	02062	MC2	0.60	\$359.10
05/04/2022	Attend to e-mails with parties in interest pursuant to D. Colo. LR 7.1(a) re: Motion for Order to Show Cause Why Michael Stewart Should Not be Held in Contempt.	B62	02062	MC2	0.30	\$179.55
05/04/2022	Review e-mail from Michael and Maria Young's counsel, Tracy Ashmore, re contempt motion against Michael Stewart for failure to turnover property.	B62	02548	DC	0.10	\$59.85
05/05/2022	Review D. Crapo's edits to avoidance motion.	B62	02062	MC2	0.10	\$59.85
05/05/2022	Review and revise motion for authorization to bring avoidance claims.	B62	02548	DC	1.60	\$957.60
05/05/2022	E-mail to M. Conlan re revisions to avoidance motion.	B62	02548	DC	0.10	\$59.85
05/09/2022	Review Order Setting Settlement Conference before Judge Crews.	B62	02062	MC2	0.10	\$59.85
05/09/2022	Review courtroom minutes from settlement conference.	B62	02062	MC2	0.10	\$59.85
05/10/2022	Review Minute Order on Stewart Defendants' Notice of Dishonor.	B62	02062	MC2	0.10	\$59.85
05/12/2022	Attend to e-mails with N. Nesvig re: net winner service addresses.	B62	02062	MC2	0.10	\$59.85
05/12/2022	Researched and retrieved personal identification information as per M. Conlan.	B62	40027	RT1	0.30	\$72.00
05/13/2022	Emails to/from M. Conlan re: insurance settlement on M/V Currencies.	B62	02518	DEB	0.30	\$179.55
05/13/2022	Telephone call with E. Rosen re: research needed on institutional investors.	B62	02062	MC2	0.10	\$59.85
05/13/2022	Telephone call with E. Rosen re: digital asset search.	B62	02062	MC2	0.20	\$119.70
05/13/2022	Review and analysis of potential Net Winners data for banking and investment company entities [1.4]; email and confer with M. Conlan re: same [0.1]; detailed email with J. Curtis re: same [0.1].	B62	26059	ER	1.60	\$439.20
05/16/2022	Emails re: Investors' complaint against Equiti.	B62	02518	DEB	0.30	\$179.55
05/16/2022	E-mails with T. Ashmore and Drinker firm re: potential Equiti liability.	B62	02062	MC2	0.10	\$59.85
05/16/2022	E-mails to/from M. Conlan re: potential claims against Equiti.	B62	02548	DC	0.10	\$59.85
05/16/2022	Email with M. Conlan re: report on records in Gibbons Concordance database.	B62	26059	ER	0.10	\$27.45
05/17/2022	Prepare for/attend conference with T. Ashmore and M. Conlan re: Receiver's potential claims against Equiti.	B62	02518	DEB	1.50	\$897.75
05/17/2022	Review J. Mason deposition.	B62	02518	DEB	0.50	\$299.25
05/17/2022	E-mails with T. Ashmore and D. Barney re: potential litigation claims.	B62	02062	MC2	0.10	\$59.85
05/17/2022	Telephone call with E. Rosen re: potential litigation claims.	B62	02062	MC2	0.10	\$59.85
05/17/2022	Teams call with T. Ashmore and D. Barney re: potential litigation claims.	B62	02062	MC2	1.50	\$897.75
05/17/2022	E-mails with D. Barney and Class Counsel re: potential litigation claims.	B62	02062	MC2	0.10	\$59.85
05/17/2022	Research on class action [0.3]; review and receipt of complaint [0.1]; confer and email with team re: same [0.1].	B62	26059	ER	0.50	\$137.25
05/18/2022	E-mails with E. Rosen re: net winner analysis.	B62	02062	MC2	0.10	\$59.85
05/18/2022	Review and receipt of Mason deposition and exhibits [0.1]; organize deposition files [0.1].	B62	26059	ER	0.20	\$54.90
05/20/2022	Telephone call with M. Conlan and D. Porteous re: claims against Equiti.	B62	02518	DEB	0.50	\$299.25

Gibbons P.C.Time Detail
Run Date: 8/10/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver for Mediatix Capital Inc.,
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
05/20/2022	Finalize documents for Avoidance Motion.	B62	30541	MAC	0.60	\$197.10
05/20/2022	Finalize documents for Motion for Forthwith Hearing.	B62	30541	MAC	0.60	\$197.10
05/20/2022	Finalize all documents for Order to Show Cause on Stewart Contempt for purposes of preparing same for filing.	B62	30541	MAC	0.20	\$65.70
05/20/2022	Telephone call with M. Conforti re: filing and service of the Stewart Contempt Motion and Avoidance Motion.	B62	02062	MC2	0.20	\$119.70
05/20/2022	Conference call with D. Porteous and D. Barney re: potential litigation claims.	B62	02062	MC2	0.50	\$299.25
05/22/2022	Email with M. Conlan re: potential subscription agreement production.	B62	26059	ER	0.10	\$27.45
05/23/2022	Conform documents to local rules (0.2); call with E Rosen to discuss same (0.1).	B62	30541	MAC	0.30	\$98.55
05/23/2022	Edit Stewart Contempt Motion to comply with local rules.	B62	30541	MAC	0.70	\$229.95
05/23/2022	E-mails with E. Rosen re: Stewart Contempt Motion and Avoidance Motion.	B62	02062	MC2	0.10	\$59.85
05/23/2022	Review motion to hold Defendant Michael Stewart in contempt.	B62	02548	DC	0.20	\$119.70
05/23/2022	E-mails to/from M. Conforti re: contempt motion.	B62	02548	DC	0.10	\$59.85
05/24/2022	Finalize three motions (Avoidance Motion (0.4); Motion for Forthwith Hearing (0.4); and Order to Show Cause (0.3)); assisted preparing same for filing (0.3).	B62	30541	MAC	1.40	\$459.90
05/24/2022	Facetime with T. Ashmore re: contempt motion.	B62	02062	MC2	0.10	\$59.85
05/24/2022	E-mails to/from E. Rosen and M. Conforti re: motions in receivership action.	B62	02548	DC	0.30	\$179.55
05/24/2022	Review and prepare Motion for Authority, Declaration, Exhibits, and Proposed Order for electronic filing [0.7]; file and serve same [0.4]; email and confer with team re: same [0.3].	B62	26059	ER	1.40	\$384.30
05/24/2022	Email with RMA re: Net Winner information.	B62	26059	ER	0.10	\$27.45
05/24/2022	Review and prepare Forthwith Motion for Motion for Authority, Declaration, and Proposed Order for electronic filing [0.2]; file and serve same [0.1]; email with team re: same [0.1].	B62	26059	ER	0.40	\$109.80
05/24/2022	Review and prepare Motion for Contempt, Brief, Declaration with numerous exhibits, and Proposed Order for electronic filing [0.3]; file and serve same [0.1]; email with team re: same [0.1].	B62	26059	ER	0.50	\$137.25
05/24/2022	Review and receipt of as-filed copies of Motion for Authority; Forthwith Motion; and Stewart Contempt Motion [0.4]; coordinate service [0.1]; email with team re: same [0.1].	B62	26059	ER	0.60	\$164.70
05/25/2022	E-mails with E. Rosen and SEC re: recent document production.	B62	02062	MC2	0.10	\$59.85
05/25/2022	Review Court's text orders (i) referring Stewart Motion for Order to Show Cause to Judge Crews, and (ii) setting briefing schedule on Authority Motion.	B62	02062	MC2	0.10	\$59.85
05/25/2022	Review and receipt of additional RMA analysis of non-investor entities [0.5]; update net winner chart re: same [0.8].	B62	26059	ER	1.30	\$356.85
05/26/2022	Research re: FOREX trading strategies and platforms re: potential claims against Equiti.	B62	02518	DEB	1.10	\$658.35
05/26/2022	Review Divisa contract and Mason deposition re: potential claims against Equiti.	B62	02518	DEB	1.00	\$598.50
05/26/2022	Coordinate share link for possible document production [0.4]; confer with team re: same [0.1]; email with counsel re: same [0.1].	B62	26059	ER	0.60	\$164.70
05/26/2022	Docket deadlines set by Court for responses to and any reply in support of Motion for Authority.	B62	26059	ER	0.10	\$27.45
05/26/2022	Continue review of RMA analysis [0.1]; update net winner chart re: same [0.1].	B62	26059	ER	0.20	\$54.90
05/27/2022	Draft subpoena to Coinbase regarding recoverable receivership assets.	B62	30541	MAC	0.60	\$197.10
05/27/2022	Assisted in finalizing subpoena to Coinbase, including effecting service of process of same.	B62	30541	MAC	0.40	\$131.40
05/27/2022	E-mails with M. Conforti Coinbase subpoena.	B62	02062	MC2	0.10	\$59.85
05/27/2022	Review and revise subpoena to Coinbase.	B62	02062	MC2	0.20	\$119.70
05/27/2022	Registered agent research on subpoena [0.1]; confer and email with team re: same [0.3]; confer and email with process server re: same [0.1].	B62	26059	ER	0.50	\$137.25
05/31/2022	Review Youngs' opposition brief to the Receiver's Avoidance Motion.	B62	30541	MAC	0.50	\$164.25
05/31/2022	Confer with M. Conlan regarding Young's opposition motion to the Receiver's Motion for Authority.	B62	30541	MAC	0.10	\$32.85
05/31/2022	Began drafting outline for Reply to the Youngs' opposition motion regarding the Receiver's Motion for Authority.	B62	30541	MAC	0.90	\$295.65
05/31/2022	Research in support of creation of outline and draft of Reply to Youngs' opposition to the Receiver's Motion for Authority.	B62	30541	MAC	1.10	\$361.35
05/31/2022	Review cases cited in Youngs' Brief in Opposition to Avoidance Motion.	B62	02062	MC2	0.60	\$359.10
05/31/2022	Review Declaration in connection with Avoidance Motion Reply Brief.	B62	02062	MC2	0.40	\$239.40
05/31/2022	Review case scheduling order.	B62	02062	MC2	0.10	\$59.85
05/31/2022	Review Young Opposition to Avoidance Motion.	B62	02062	MC2	0.40	\$239.40

Gibbons P.C.

Time Detail

Run Date: 8/10/2022

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
05/31/2022	Attend to e-mails with J. Curtis, M. Conforti and D. Barney re: reply brief in support of avoidance motion.	B62	02062	MC2	0.20	\$119.70
06/01/2022	Continued research to assist with creation of outline and draft of Reply to Youngs' opposition to the Receiver's Motion for Authority.	B62	30541	MAC	2.00	\$657.00
06/01/2022	Initial draft of Reply to Youngs' opposition to the Receiver's Motion for Authority.	B62	30541	MAC	4.10	\$1,346.85
06/01/2022	Attend to e-mails with team re: summons for broker dealer action.	B62	02062	MC2	0.10	\$59.85
06/01/2022	Review and analyze draft reply to Young objection to avoidance motion.	B62	02062	MC2	0.70	\$418.95
06/01/2022	E-mails with J. Curtis re: financial fraud analysis.	B62	02062	MC2	0.20	\$119.70
06/01/2022	Confer with D. Crapo re: avoidance reply brief.	B62	02062	MC2	0.20	\$119.70
06/01/2022	Telephone call with T. Ashmore re: objection to avoidance motion.	B62	02062	MC2	0.40	\$239.40
06/01/2022	Reviewing background documents for Avoidance Reply Brief, including Declaration and exhibits thereto.	B62	02062	MC2	1.60	\$957.60
06/01/2022	Confer with M. Conforti re: response to Young Objection to Avoidance Motion.	B62	02062	MC2	0.20	\$119.70
06/01/2022	Review and revise Receiver's Reply to Michael and Maria Young's opposition to Receiver's motion for leave to file avoidance actions.	B62	02548	DC	1.40	\$837.90
06/01/2022	Confer with M. Conlan re: Receiver's Reply to Michael and Maria Young's opposition to Receiver's motion for leave to file avoidance actions.	B62	02548	DC	0.20	\$119.70
06/01/2022	Review and analyze Michael and Maria Young's opposition to Receiver's motion for authorization to bring avoidance actions.	B62	02548	DC	0.60	\$359.10
06/01/2022	Confer with team re: Net Winners.	B62	26059	ER	0.10	\$27.45
06/01/2022	Review responses to Avoidance Action Motion; email with team re: same.	B62	26059	ER	0.10	\$27.45
06/01/2022	Email with SEC and team re: potential production.	B62	26059	ER	0.20	\$54.90
06/02/2022	Finished initial draft of Reply to Youngs' opposition to the Receiver's Motion for Authority.	B62	30541	MAC	1.40	\$459.90
06/02/2022	Edits and revisions to draft Reply to Youngs' opposition to the Receiver's Motion for Authority.	B62	30541	MAC	0.70	\$229.95
06/02/2022	Review edits to avoidance reply brief; e-mails with J. Curtis, M. Conforti and D. Crapo re: same.	B62	02062	MC2	0.40	\$239.40
06/02/2022	Review and revise avoidance reply brief.	B62	02062	MC2	0.30	\$179.55
06/02/2022	Telephone call with counsel for Coinbase re: Stewart Subpoena [0.3]; follow-up fact research and e-mails re: same [0.2].	B62	02062	MC2	0.50	\$299.25
06/02/2022	E-mails to/from M. Conlan and M. Conforti and from John Curtis re: reply to Michael and Maria Young's response to Receivers Motion for Leave to File Avoidance Actions.	B62	02548	DC	0.50	\$299.25
06/02/2022	Email with team re: Net Winners data.	B62	26059	ER	0.10	\$27.45
06/02/2022	Communications with SEC regarding the collection of documents.	B62	89266	DW	0.30	\$62.10
06/03/2022	Legal research for Coinbase subpoena.	B62	30541	MAC	0.20	\$65.70
06/03/2022	Emails discussing Coinbase subpoena.	B62	30541	MAC	0.10	\$32.85
06/03/2022	Draft Notice of Subpoena for the Coinbase subpoena.	B62	30541	MAC	0.10	\$32.85
06/03/2022	Attend to e-mails with M. Conforti and E. Rosen re: service of Coinbase subpoena.	B62	02062	MC2	0.10	\$59.85
06/03/2022	Update witness and party list.	B62	26059	ER	0.40	\$109.80
06/03/2022	Review and receipt of Coinbase subpoena affidavit [0.1]; research re: same [0.1]; email with team re: same [0.1].	B62	26059	ER	0.30	\$82.35
06/03/2022	Serve Notice of Subpoena.	B62	26059	ER	0.10	\$27.45
06/06/2022	Draft Notice of Subpoena and subpoena for LaVelle law firm.	B62	30541	MAC	0.40	\$131.40
06/06/2022	Confer with M Conlan regarding subpoena to LaVelle law firm.	B62	30541	MAC	0.20	\$65.70
06/06/2022	Telephone call with E. Rosen re: open issues with broker action.	B62	02062	MC2	0.10	\$59.85
06/06/2022	Telephone call with SEC re: tracing assets and document productions.	B62	02062	MC2	0.60	\$359.10
06/06/2022	Review draft subpoena re: gold coins (0.1); telephone call with M. Conforti re: same (0.2).	B62	02062	MC2	0.30	\$179.55
06/06/2022	Telephone call with SEC re: avoidance motion.	B62	02062	MC2	0.20	\$119.70
06/06/2022	Telephone call with E. Rosen re: filing avoidance reply brief; e-mails with M. Conforti re: same.	B62	02062	MC2	0.10	\$59.85
06/06/2022	Review and revise avoidance reply brief [0.8]; e-mail same to D. Crapo and E. Rosen for filing [0.1].	B62	02062	MC2	0.90	\$538.65
06/06/2022	E-mails with M. Conforti re: issuance of document subpoena to Mr. Stewart's former law firm re: document request for retainer check/wire receipts.	B62	02062	MC2	0.20	\$119.70
06/06/2022	Review final draft of Receiver's Reply to Michael and Maria Young's opposition for motion for leave to file avoidance actions.	B62	02548	DC	0.10	\$59.85
06/06/2022	Confer with M. Conlan re: Reply.	B62	02548	DC	0.10	\$59.85

Gibbons P.C.Time Detail
Run Date: 8/10/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver for Mediatix Capital Inc.,
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
06/06/2022	E-mail to E. Rosen re: Reply.	B62	02548	DC	0.10	\$59.85
06/06/2022	Prepare Reply in Support of Motion for Authority for electronic filing [0.1]; file and serve same [0.2]; review and receipt of as-filed version of same [0.1]; email with team re: same [0.1].	B62	26059	ER	0.50	\$137.25
06/07/2022	Drafted Interrogatory and Document Requests to Michael S. Stewart.	B62	30541	MAC	1.80	\$591.30
06/07/2022	E-mails with M. Conforti re: service of Stewart interrogatories.	B62	02062	MC2	0.10	\$59.85
06/07/2022	Review and revise interrogatories to Michael Stewart; e-mails with M. Conforti re: same.	B62	02062	MC2	0.10	\$59.85
06/07/2022	Review discovery requests to Michael Stewart.	B62	02548	DC	0.20	\$119.70
06/07/2022	E-mails to/from M. Conlan re: discovery requests.	B62	02548	DC	0.10	\$59.85
06/08/2022	Emails regarding subpoena service.	B62	30541	MAC	0.10	\$32.85
06/08/2022	Assisting finalizing subpoena and discovery requests for service.	B62	30541	MAC	0.30	\$98.55
06/08/2022	E-mails with M. Conforti re: service of discovery on M. Stewart and LaVelle & LaVelle.	B62	02062	MC2	0.10	\$59.85
06/08/2022	Telephone call with E. Rosen re: service of LaVelle subpoena.	B62	02062	MC2	0.10	\$59.85
06/08/2022	Registered agent and address research for subpoena (0.2); confer and email with team re: same (0.1); confer and email with process server re: same (0.1); coordinate service of same along with Notice of Subpoena (0.1).	B62	26059	ER	0.50	\$137.25
06/08/2022	Coordinate email and mail service of discovery to M. Stewart [0.1]; confer and email with team re: same [0.1].	B62	26059	ER	0.20	\$54.90
06/09/2022	Review order authorizing Receiver to bring avoidance action.	B62	02548	DC	0.10	\$59.85
06/10/2022	Review Judge Crews' order cancelling settlement conference.	B62	02062	MC2	0.10	\$59.85
06/10/2022	Review Order Approving Avoidance Motion [0.1]; attend to follow-up e-mails with D. Crapo, E. Rosen, D. Barney, M. Conforti and J. Curtis re: same [0.1].	B62	02062	MC2	0.20	\$119.70
06/10/2022	Review e-mails from M. Conlan, E. Rosen and John Curtis re: order granting leave to bring avoidance actions.	B62	02548	DC	0.20	\$119.70
06/13/2022	Prepare for call with M Conlan regarding Asset Freeze Violations.	B62	30541	MAC	0.10	\$32.85
06/13/2022	Call with M Conlan regarding needs related to Avoidance Claims.	B62	30541	MAC	0.70	\$229.95
06/13/2022	Drafting broker complaint.	B62	30541	MAC	5.20	\$1,708.20
06/13/2022	Telephone call with E. Rosen re: Mediatix avoidance program.	B62	02062	MC2	0.40	\$239.40
06/13/2022	Teams call with D. Barney, D. Crapo, M. Conforti and E. Rosen re: avoidance program.	B62	02062	MC2	0.70	\$418.95
06/13/2022	Telephone call with M. Conforti re: broker complaint.	B62	02062	MC2	0.10	\$59.85
06/13/2022	Review form of avoidance schedule for broker complaint; e-mails with J. Curtis re: same.	B62	02062	MC2	0.10	\$59.85
06/13/2022	Fact research for broker complaint.	B62	02062	MC2	0.50	\$299.25
06/13/2022	E-mails with SEC re: document production.	B62	02062	MC2	0.10	\$59.85
06/13/2022	Participate in conference call re: strategy for avoidance actions.	B62	02548	DC	0.70	\$418.95
06/13/2022	Review e-mails from John Curtis re: avoidance actions.	B62	02548	DC	0.10	\$59.85
06/13/2022	Confer with team re: potential litigation data [0.3]; fact research re: same [0.4]; email and confer with team re: same [0.1].	B62	26059	ER	0.80	\$219.60
06/14/2022	Confer with E. Rosen regarding procedural requirements for filing Broker Complaint.	B62	30541	MAC	1.20	\$394.20
06/14/2022	Finish drafting Broker complaint.	B62	30541	MAC	4.00	\$1,314.00
06/14/2022	Review and analyze accountant's itemized Broker transfers.	B62	30541	MAC	0.70	\$229.95
06/14/2022	Assisted with finalizing all documents, integrating all edits and revisions, and filing of the Broker Complaint.	B62	30541	MAC	1.00	\$328.50
06/14/2022	Fact research for Broker complaint (0.4); e-mails and telephone calls with M. Conforti re: same (0.3).	B62	02062	MC2	0.70	\$418.95
06/14/2022	Telephone calls and e-mails with M. Conforti and D. Barney re: broker complaint.	B62	02062	MC2	0.20	\$119.70
06/14/2022	Review and revise broker complaint.	B62	02062	MC2	1.00	\$598.50
06/14/2022	E-mails with E. Rosen, D. Crapo and M. Conforti re: civil cover sheet for broker action.	B62	02062	MC2	0.10	\$59.85
06/14/2022	E-mails with J. Curtis re: net winner claims.	B62	02062	MC2	0.10	\$59.85
06/14/2022	E-mails with team re: form of avoidance demand letter.	B62	02062	MC2	0.10	\$59.85
06/14/2022	Review Colorado Civil Suit Package; e-mails with M. Conforti re: same.	B62	02062	MC2	0.10	\$59.85
06/14/2022	Participate in conference call re: strategy for avoidance actions.	B62	02548	DC	0.70	\$418.95
06/14/2022	Review avoidance complaint against brokers.	B62	02548	DC	0.40	\$239.40

Gibbons P.C.Time Detail
Run Date: 8/10/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver for Mediatix Capital Inc.,
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
06/14/2022	Review e-mails from M. Conlan, D.E. Barney, M. Conforti and E. Rosen re: finalization of complaint against brokers.	B62	02548	DC	0.30	\$179.55
06/14/2022	Confer with E. Rosen re: finalization of complaint against brokers.	B62	02548	DC	0.20	\$119.70
06/14/2022	E-mail to E. Rosen re: avoidance actions against charities.	B62	02548	DC	0.10	\$59.85
06/14/2022	Review documents and data in connection with the preparation of avoidance complaints against charities and suits against asset freeze violators.	B62	02548	DC	0.60	\$359.10
06/14/2022	Review proposed exhibits and other data to update statute of limitations data [0.5]; create spreadsheet of same [0.6]; email and confer with team re: address for broker [0.1]; confer and detailed email with team re: same [0.9].	B62	26059	ER	2.10	\$576.45
06/14/2022	Prepare Civil Cover Sheet for Avoidance Action Complaint [0.5]; prepare Complaint, Cover Sheet and exhibits A-B for electronic filing [0.5]; complete elaborate attorney case opening process [0.5]; file and serve Complaint and attachments [0.2]; review and receipt of same [0.2]; confer and email with team re: same [0.5]; confer and email with team re: summons [0.2].	B62	26059	ER	2.60	\$713.70
06/14/2022	Researched and retrieved address information for international company.	B62	40027	RT1	1.00	\$240.00
06/15/2022	Emails regarding docket activity related to Stewart Contempt Motion.	B62	30541	MAC	0.10	\$32.85
06/15/2022	Review draft summonses for Broker Defendants compliance with local rules.	B62	30541	MAC	0.20	\$65.70
06/15/2022	Legal research related to Michael Stewart Contempt Motion.	B62	30541	MAC	0.50	\$164.25
06/15/2022	Draft Net Winner Demand Letters seeking return of fictitious profits and offering settlement parameters.	B62	30541	MAC	2.30	\$755.55
06/15/2022	Draft Net Winner complaint.	B62	30541	MAC	3.90	\$1,281.15
06/15/2022	Telephone calls with E. Rosen re: Broker Dealer complaint.	B62	02062	MC2	0.10	\$59.85
06/15/2022	E-mails with M. Conforti re: Stewart contempt motion.	B62	02062	MC2	0.10	\$59.85
06/15/2022	Analyze documents and reports to evaluate claims concerning violations of the Asset Freeze Order.	B62	02548	DC	3.30	\$1,975.05
06/15/2022	Draft summonses for each of 10 defendants [0.9]; monitor docket for Judge assignment [0.1]; detailed email with team re: summons and judge assignment [0.2]; prepare summons request for electronic filing [0.1]; file and serve same [0.2]; confer with Clerk and M. Conlan re: judge assignment and summons request [0.1].	B62	26059	ER	1.60	\$439.20
06/16/2022	Review form for Consent to Magistrate Judge, for purposes of conferring with defendants after serving defendants.	B62	30541	MAC	0.10	\$32.85
06/16/2022	Telephone call with E. Rosen re: service of LeValle subpoena.	B62	02062	MC2	0.10	\$59.85
06/16/2022	Review e-mails from E. Rosen and M. Conforti re: procedural issues.	B62	02548	DC	0.10	\$59.85
06/16/2022	Review and receipt of Affidavit for service of subpoena [0.1]; docket deadline; email with process server re: same [0.1].	B62	26059	ER	0.20	\$54.90
06/16/2022	Monitor docket for issuance of 10 subpoenas [0.1]; review and receipt of Magistrate Consent with Election form; email with team re: same [0.1].	B62	26059	ER	0.20	\$54.90
06/17/2022	Review and respond to e-mails from E. Rosen and M. Conforti re: service of broker complaints.	B62	02548	DC	0.30	\$179.55
06/17/2022	Revise summons request for each of 10 defendants per USDC CO comment [1.2]; file and serve same [0.1]; email with team re: summons [0.2]; confer with Clerk re: comments on summons request [0.2].	B62	26059	ER	1.70	\$466.65
06/20/2022	Review Coinbase production [0.1]; e-mails with counsel for Coinbase re: same [0.1].	B62	02062	MC2	0.20	\$119.70
06/21/2022	Attend to e-mails with counsel for Coinbase and SEC re: subpoena response.	B62	02062	MC2	0.10	\$59.85
06/27/2022	Attention to LaVelle response letter to Receiver's subpoena to the LaVelle firm.	B62	30541	MAC	0.20	\$65.70
06/27/2022	Attention to rare coin demand letter from Receiver to Mr. Stewart, including his response thereto.	B62	30541	MAC	0.30	\$98.55
06/27/2022	Attention to Coinbase response to the Receiver's subpoena, including a review of the documents produced.	B62	30541	MAC	0.40	\$131.40
06/27/2022	Review draft report from accountant pertaining to Net Winners.	B62	30541	MAC	2.90	\$952.65
06/27/2022	Legal research on service of foreign defendants.	B62	02062	MC2	0.10	\$59.85
06/27/2022	E-mails with M. Conforti re: CoinBase subpoena response.	B62	02062	MC2	0.10	\$59.85
06/27/2022	Telephone call with E. Rosen re: net winner analysis [0.1]; e-mails with J. Curtis and team re: same [0.1].	B62	02062	MC2	0.20	\$119.70
06/27/2022	Review Broker action, service requirements for foreign defendants; e-mails with team re: same.	B62	02062	MC2	0.30	\$179.55
06/27/2022	Review document production from LaVelle & LaVelle.	B62	02062	MC2	0.30	\$179.55
06/27/2022	Review e-mails between various parties re: complaint against Brokers.	B62	02548	DC	0.30	\$179.55
06/27/2022	Email and confer with team re: summons status, service logistics, and Consent to Magistrate.	B62	26059	ER	0.30	\$82.35
06/27/2022	Review draft complaint exhibits (0.1); email with team re: same (0.1).	B62	26059	ER	0.20	\$54.90

23
Gibbons P.C.Time Detail
Run Date: 8/10/2022

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
06/28/2022	Review Broker-related documents for purposes of Broker Demand Letters.	B62	30541	MAC	0.70	\$229.95
06/28/2022	Review accountant's reports on Broker entities for Broker Demand Letters.	B62	30541	MAC	0.40	\$131.40
06/28/2022	Emails with Coinbase representative for purposes of permitting Receiver to take possession of Receivership Property and assets.	B62	30541	MAC	0.10	\$32.85
06/28/2022	Draft avoidance demand letters for Brokers.	B62	30541	MAC	2.20	\$722.70
06/28/2022	Review Stewart Notice of Dishonor; e-mails with M. Conforti re: scheduling deposition.	B62	02062	MC2	0.10	\$59.85
06/28/2022	E-mails with E. Rosen re: service of broker complaints.	B62	02062	MC2	0.10	\$59.85
06/28/2022	Research on international service of broker dealer complaint.	B62	02062	MC2	0.10	\$59.85
06/28/2022	Telephone call and e-mails with M. Conforti re: international service.	B62	02062	MC2	0.10	\$59.85
06/28/2022	Telephone call with Sondra Rinsky (Express Subpoena) re: international service of Broker complaint.	B62	02062	MC2	0.10	\$59.85
06/28/2022	Review and revise Broker Demand Letter; e-mails with M. Conforti re: same.	B62	02062	MC2	0.60	\$359.10
06/28/2022	Draft detailed e-mail to team re: broker dealer action.	B62	02062	MC2	0.30	\$179.55
06/28/2022	Telephone call with Ashley in accounting at Interlink Engineering re: tracing LaVelle retainer.	B62	02062	MC2	0.30	\$179.55
06/28/2022	Fact research on LaVelle retainer.	B62	02062	MC2	0.40	\$239.40
06/28/2022	Telephone call to B. Warrington re: tracing LaVelle retainer.	B62	02062	MC2	0.10	\$59.85
06/28/2022	Review and revise net winner demand letter.	B62	02062	MC2	0.40	\$239.40
06/28/2022	Review law and documents in connection with seeking to recover from violators of the Asset Freeze Order.	B62	02548	DC	0.30	\$179.55
06/28/2022	Detailed email with team re: service logistics, domestic and foreign (0.4); prepare complaint packages for service (0.2); detailed email and confer with process server re: same (0.2).	B62	26059	ER	0.80	\$219.60
06/29/2022	Emails regarding international service of process on certain foreign Broker Defendants.	B62	30541	MAC	0.10	\$32.85
06/29/2022	Consider and apply various legal theories to recovery for violations of the Asset Freeze Order.	B62	02548	DC	2.30	\$1,376.55
06/30/2022	Emails regarding international service of process on foreign Broker avoidance defendants.	B62	30541	MAC	0.10	\$32.85
06/30/2022	Confer with E. Rosen regarding international service of process on foreign Broker defendants.	B62	30541	MAC	0.10	\$32.85
06/30/2022	Research regarding domestic service of process on Broker defendants.	B62	30541	MAC	0.20	\$65.70
06/30/2022	Telephone call with E. Rosen re: service of summons on foreign defendants.	B62	02062	MC2	0.20	\$119.70
06/30/2022	Detailed emails and confer with team and process server re: foreign service logistics [0.4]; procedural research re: same [0.8].	B62	26059	ER	1.20	\$329.40
06/30/2022	Email with team re: alternate defendant location research for service of summons and broker complaint [0.1]; review report; email process server and team re: same [0.1].	B62	26059	ER	0.20	\$54.90
	Sub-Total For Task:	B62	Litigation		201.00	\$84,339.60
04/06/2022	Telephone call with E. Rosen re: Q1 fee application.	B58	02062	MC2	0.20	\$119.70
04/19/2022	Attend to e-mails with J. Curtis re: Q1 fee applications.	B58	02062	MC2	0.10	\$59.85
04/20/2022	E-mails with E. Rosen and S. Laing re: Q1 fee application.	B58	02062	MC2	0.10	\$59.85
04/21/2022	E-mails with P. Eiden and S. Laing re: Q1 fee applications.	B58	02062	MC2	0.10	\$59.85
05/02/2022	Email with team and Rocky Mountain Advisory regarding 1st Quarter Fee Application.	B58	26059	ER	0.10	\$27.45
05/02/2022	Draft 1st Quarter Fee Application and Conlan Declaration.	B58	26059	ER	0.90	\$247.05
05/04/2022	Draft Crapo Declaration in support of 1st Quarter Fee Application and proposed order re: same.	B58	26059	ER	0.30	\$82.35
05/04/2022	Draft 1st Quarter Fee Application and proposed order re: same.	B58	26059	ER	1.10	\$301.95
05/05/2022	E-mails with E. Rosen re: review of fee application.	B58	02062	MC2	0.10	\$59.85
05/05/2022	Telephone call with E. Rosen re: Q1 fee application.	B58	02062	MC2	0.10	\$59.85
05/05/2022	Draft portions of 1st Quarter 2022 Fee Application [1.3]; draft portions of proposed order and declarations re: same [0.3]; confer and detailed email with team re: same [0.3].	B58	26059	ER	1.90	\$521.55
05/06/2022	E-mails with E. Rosen re: redacting fee application.	B58	02062	MC2	0.10	\$59.85
05/06/2022	E-mails to/from M. Conlan and E. Rosen re: fee application.	B58	02548	DC	0.20	\$119.70
05/06/2022	Begin review of fee application.	B58	02548	DC	0.10	\$59.85
05/06/2022	Review Receiver invoice for 1st Quarter 2022 Fee Application to identify confidential entries that may require redaction [0.2]; review Counsel invoice for 1st Quarter 2022 Fee Application re: same [0.6]; detailed email with team re: same [0.1]; redact confidential portions of invoice [0.2]; email and confer with team re: same [0.1].	B58	26059	ER	1.20	\$329.40

Gibbons P.C.Time Detail
Run Date: 8/10/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver for Mediatix Capital Inc.,
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
05/09/2022	Review and redact time entries for Q1 fee application.	B58	02062	MC2	0.20	\$119.70
05/09/2022	Email and confer with team re: Gibbons invoice redactions for and regarding 1st Quarter 2022 Fee Application [0.2]; mark and apply redactions to Gibbons invoice per attorney comments [0.8].	B58	26059	ER	1.00	\$274.50
05/10/2022	Review and revise Q1 fee application (0.2); e-mails with E. Rosen and D. Crapo re: same (0.1).	B58	02062	MC2	0.30	\$179.55
05/10/2022	Review of and revisions to fee application pleadings and exhibits.	B58	02548	DC	1.20	\$718.20
05/10/2022	E-mails to/from M. Conlan and E. Rosen re: fee application.	B58	02548	DC	0.20	\$119.70
05/10/2022	Review and edit latest draft of 1st Quarter 2022 Fee Application [0.4]; email with team re: same [0.1].	B58	26059	ER	0.50	\$137.25
05/11/2022	Generate and assemble SEC review copies of 1st Quarter 2022 Fee Application [0.5]; email with SEC re: same [0.1].	B58	26059	ER	0.60	\$164.70
05/16/2022	Review e-mail from E. Rosen to SEC re: Q1 fee application.	B58	02062	MC2	0.10	\$59.85
05/26/2022	Email with SEC counsel and team re: 1st Quarter 2022 Fee Application.	B58	26059	ER	0.10	\$27.45
05/27/2022	Telephone call with E. Rosen re: fee application.	B58	02062	MC2	0.10	\$59.85
05/27/2022	Review and respond to e-mail from E. Rosen re: fee application.	B58	02548	DC	0.20	\$119.70
05/27/2022	Prepare 1st Quarter 2022 Fee Application with Declarations, Exhibits, and Proposed Order for electronic filing; [0.5] file and serve same [0.2]; review and receipt of as-filed versions [0.1]; coordinate service [0.3]; email with team re: same [0.1].	B58	26059	ER	1.20	\$329.40
	Sub-Total For Task:	B58	Fee Applications		12.30	\$4,477.95
05/04/2022	E-mails with T. Ashmore re: due diligence on third party claims.	B54	02062	MC2	0.10	\$59.85
05/04/2022	E-mails with D. Barney re: third-party claims.	B54	02062	MC2	0.20	\$119.70
	Sub-Total For Task:	B54	Claims Administration and Objections		0.30	\$179.55
04/03/2022	Review initial pleadings.	B53	30541	MAC	0.70	\$229.95
04/05/2022	Telephone call with E. Rosen re: contact information for M. Stewart.	B53	02062	MC2	0.20	\$119.70
04/05/2022	Confer with team re: Stewart Non-negotiable Notice of Acceptance [0.1]; email with team re: same [0.1].	B53	26059	ER	0.20	\$54.90
04/25/2022	Monitor case docket.	B53	02062	MC2	0.10	\$59.85
04/29/2022	Telephone call with E. Rosen re: e-mail from M. Baker re: request for removal from service lists [0.1]; fact research re: same [0.1].	B53	02062	MC2	0.20	\$119.70
05/12/2022	Attend to e-mails with SEC team re: Chicago Title request for confirmation of no lien in connection with 10417 West Alyssa Lane.	B53	02062	MC2	0.30	\$179.55
05/12/2022	Telephone call with E. Rosen re: search on seller of 10417 West Alyssa Lane, Peoria, AZ.	B53	02062	MC2	0.30	\$179.55
05/12/2022	Attend to e-mails with R. Traylor, E. Rosen, and SEC team re: confirming no interest in real property located at 10417 West Alyssa Lane, Peoria, AZ [0.2], telephone call with E. Rosen re: same [0.1].	B53	02062	MC2	0.30	\$179.55
05/13/2022	Attend to e-mails with E. Rosen re: Mediatix database files.	B53	02062	MC2	0.10	\$59.85
05/23/2022	Email with team re: draft motions along with fee application pending SEC review [0.2]; confer with team re: draft motions [0.3].	B53	26059	ER	0.50	\$137.25
05/24/2022	Telephone calls with E. Rosen and D. Crapo re: avoidance motion and recording Lloyds Road deed.	B53	02062	MC2	0.10	\$59.85
06/10/2022	Review SEC Notice of Appearance filed today; update Service List re: same [0.1]; email with team re: updated Service List [0.1].	B53	26059	ER	0.20	\$54.90
	Sub-Total For Task:	B53	Case Administration		3.20	\$1,434.60
04/01/2022	Email with developer re: Mediatix Receivership website; email and confer with team re: same.	B52	26059	ER	0.10	\$27.45
04/11/2022	E-mails to/from John LaPinto re: insurance coverage.	B52	02548	DC	0.20	\$119.70
04/12/2022	Review and respond to e-mails from insurance broker, John DiPinto, and M. Conlan re: insurance coverage on the Youngs' residence [0.3]; review e-mails from the Youngs' counsel re: same [0.2].	B52	02548	DC	0.50	\$299.25
04/13/2022	E-mails to/from M. Conlan and from John DiPinto, broker, re: insurance on Young residence.	B52	02548	DC	0.20	\$119.70
04/29/2022	Post as-filed Quarterly Report for 1st Quarter 2022 to Case News and Substantive Pleadings on mediatixreceivership.com website.	B52	26059	ER	0.30	\$82.35
04/29/2022	Email and confer with M. Conlan re: request from M. Baker to remove from service list.	B52	26059	ER	0.10	\$27.45
05/06/2022	Review and receipt of bank statement.	B52	26059	ER	0.10	\$27.45
05/09/2022	E-mails with SEC and E. Rosen re: investor addresses.	B52	02062	MC2	0.10	\$59.85
05/11/2022	Email G. Caris re: Greenwood Village policy.	B52	26059	ER	0.10	\$27.45

Gibbons P.C.

Time Detail

Run Date: 8/10/2022

Client/Matter: 117199 Mark Conlan 106202 Counsel to Mark Conlan in his capacity as SEC Receiver for Mediatix Capital Inc.,
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
05/16/2022	E-mails with investor B.S. re: status of receivership.	B52	02062	MC2	0.20	\$119.70
05/18/2022	Review investor correspondence [0.1]; email with team re: same [0.2].	B52	26059	ER	0.30	\$82.35
05/18/2022	Detailed email with M. Conlan re: frequent investor question.	B52	26059	ER	0.30	\$82.35
05/19/2022	E-mails to/from M. Conlan re: insurance on 1197 Lloyds Road.	B52	02548	DC	0.10	\$59.85
05/19/2022	Confer with insurance broker, Michael Blackburn of Hibbs Hallmark. re: insurance on 1197 Lloyds Road property.	B52	02548	DC	0.10	\$59.85
05/19/2022	E-mail to Michael Blackburn re: insurance on 1197 Lloyds Road property.	B52	02548	DC	0.10	\$59.85
05/19/2022	Review and respond to e-mail from Michael Blackburn re: insurance on 1197 Lloyds Road property.	B52	02548	DC	0.30	\$179.55
05/19/2022	Review and respond to e-mail from counsel for an investor, D.K. re: distributions and other procedural issues.	B52	02548	DC	0.30	\$179.55
05/20/2022	Review and receipt of investor correspondence.	B52	26059	ER	0.10	\$27.45
05/20/2022	Review and receipt of Certificates of Insurance from Barnes & Thornburg; email with team re: same.	B52	26059	ER	0.10	\$27.45
05/20/2022	Email and confer with team re: website posts.	B52	26059	ER	0.10	\$27.45
05/23/2022	Update mediatrixreceivership website with 5/23 Equiti Order to Transfer Funds [0.1]; add case news post re: same [0.1]; email with M. Conlan re: same [0.1].	B52	26059	ER	0.30	\$82.35
05/25/2022	Update mediatrixreceivership.com website with three motions filed yesterday.	B52	26059	ER	0.50	\$137.25
05/31/2022	Update mediatrixreceivership website with latest deadline, contacts, and substantive pleadings.	B52	26059	ER	0.60	\$164.70
06/01/2022	Confer with M. Conlan re: insurance on 1197 Lloyds Road property.	B52	02548	DC	0.10	\$59.85
06/01/2022	Confer with Mark Blackburn of Hibbs Hallmark & Co. re: insurance on 1197 Lloyds Road property.	B52	02548	DC	0.20	\$119.70
06/03/2022	E-mail from Mark Blackburn, insurance broker, re: insurance on 1197 Lloyds Road property.	B52	02548	DC	0.10	\$59.85
06/03/2022	Review and respond to e-mail from Broker, James Hankins, to Mr. Blackburn.	B52	02548	DC	0.10	\$59.85
06/06/2022	E-mails to/from Mark Blackburn, insurance broker, re: policy on 1197 Lloyds Road property.	B52	02548	DC	0.30	\$179.55
06/06/2022	Review proposed policy on 1197 Lloyds Road property.	B52	02548	DC	0.10	\$59.85
06/06/2022	E-mails to/from M. Conlan re: policy on 1197 Lloyds Road property.	B52	02548	DC	0.10	\$59.85
06/06/2022	Add Young Opposition and Reply in Support of Motion for Authority for electronic filing to Substantive Pleadings on mediatrixreceivership website.	B52	26059	ER	0.30	\$82.35
06/07/2022	Follow up on insurance of the 1197 Lloyds Road property.	B52	02548	DC	0.10	\$59.85
06/09/2022	Review and receipt of insurance documentation.	B52	26059	ER	0.10	\$27.45
06/10/2022	Add Order Granting Motion for Authority for electronic filing to Substantive Pleadings on mediatrixreceivership website [0.1]; email with team re: same [0.1].	B52	26059	ER	0.20	\$54.90
06/21/2022	Review and receipt of email from J. DePinto; organize Insurance documentation.	B52	26059	ER	0.10	\$27.45
06/22/2022	Review and receipt of email regarding Lloyds policy; email with team re: same.	B52	26059	ER	0.10	\$27.45
	Sub-Total For Task:	B52	Business Operations		7.00	\$2,958.30
04/06/2022	E-mails to/from broker James Hankins re: transfer of title to 1197 Lloyd Road property back into Bryant Sewall.	B51	02548	DC	0.10	\$59.85
04/08/2022	E-mail to Bryant Sewall's counsel, Vivian Drohan, re: deed of 1197 Lloyd's Road property back into Mr. Sewall's name.	B51	02548	DC	0.10	\$59.85
04/12/2022	Review and respond to e-mail from broker, James Hankins, re: sale of 1197 Lloyd's Road property.	B51	02548	DC	0.10	\$59.85
04/13/2022	Telephone call with V. Drohan re: execution of 1197 Lloyds Road deed.	B51	02062	MC2	0.10	\$59.85
04/14/2022	E-mails to/from M. Conlan re: insuring Young residence and status of deed returning title to 1197 Lloyd Road property to Bryant Sewall.	B51	02548	DC	0.30	\$179.55
04/18/2022	E-mail to Nancy Patterson re: transfer of 1197 Lloyds Road property back into the name of Bryant Sewall.	B51	02548	DC	0.10	\$59.85
04/18/2022	E-mails to/from broker, James Hankins, re: status of sale of 1197 Lloyd Road property.	B51	02548	DC	0.10	\$59.85
04/21/2022	Telephone with SEC counsel and M. Conlan re: sale of M/V Currenseas.	B51	02518	DEB	0.50	\$299.25
04/21/2022	Telephone call with V. Drohan re: conveyance of 1197 Lloyds Road property back to Bryant Sewall in order to facilitate sale.	B51	02062	MC2	0.20	\$119.70
04/22/2022	E-mails to/from M. Conlan re: transfer of 1197 Lloyd Road property back into defendant Bryant Sewall.	B51	02548	DC	0.20	\$119.70
04/27/2022	E-mails from James Hankin, broker, re sale of 1197 Lloyd Road property.	B51	02548	DC	0.20	\$119.70
04/28/2022	E-mails with D. Crapo re: 1197 Lloyds Road sale.	B51	02062	MC2	0.10	\$59.85

23
Gibbons P.C.Time Detail
Run Date: 8/10/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver for Mediatrix Capital Inc.,
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
05/04/2022	Telephone call with V. Drohan re: 1197 Lloyds Road deed and Stewart Contempt Motion.	B51	02062	MC2	0.10	\$59.85
05/04/2022	E-mails with D. Crapo re: recordation of Azimuth Trust Deed for 1197 Lloyds Road.	B51	02062	MC2	0.10	\$59.85
05/04/2022	E-mails to/from M. Conlan re: sale of 1197 Lloyd's Road property.	B51	02548	DC	0.10	\$59.85
05/04/2022	E-mails to/from broker, James Hankins, re: sale of 1197 Lloyd's Road property.	B51	02548	DC	0.10	\$59.85
05/04/2022	E-mails to/from E. Rosen re: sale of 1197 Lloyd's Road property.	B51	02548	DC	0.10	\$59.85
05/05/2022	E-mails to/from M. Conlan re: sale of 1197 Lloyd's Road property.	B51	02548	DC	0.10	\$59.85
05/05/2022	Confer with M. Conlan re: sale of 1197 Lloyd's Road property.	B51	02548	DC	0.10	\$59.85
05/09/2022	E-mails to/from M. Conlan re: sale of 1197 Lloyd Road property.	B51	02548	DC	0.10	\$59.85
05/09/2022	Confer with M. Conlan re: status of sale of 1197 Lloyd Road property.	B51	02548	DC	0.10	\$59.85
05/09/2022	Confer with Bryant Sewall's counsel, Vivian Drohan, re: deed to 1197 Lloyd Road.	B51	02548	DC	0.10	\$59.85
05/10/2022	Attend to e-mails with Vivian Drohan, J. Hankins, D. Crapo and N. Patterson re: conveyance deed from Azimuth Family Trust to Bryant Sewall.	B51	02062	MC2	0.20	\$119.70
05/11/2022	E-mails to/from: title officer, Nancy Patterson, Bryant Sewall's counsel, Vivian Drohan and M. Conlan re: deed for 1197 Lloyds Road into Bryant Sewall.	B51	02548	DC	0.60	\$359.10
05/12/2022	Attend to e-mails with D. Crapo, N. Patterson and V. Drohan re: conveyance deed for 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$59.85
05/12/2022	E-mails to/from Bryant Sewall's counsel, Vivian Drohan, re: deed to 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
05/12/2022	E-mails to/from title counsel, Nancy Patterson, re: deed to 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
05/16/2022	E-mails to/from title attorney, Nancy Patterson re: deed to 1197 Lloyd Road property.	B51	02548	DC	0.20	\$119.70
05/17/2022	Attend to e-mails with N. Patterson and D. Crapo re: 1197 Lloyds Road property sale.	B51	02062	MC2	0.20	\$119.70
05/17/2022	Review Broker Price Opinion on 1197 Lloyds Road property.	B51	02062	MC2	1.00	\$598.50
05/17/2022	Review e-mails from various parties concerning the sale of the 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
05/17/2022	E-mails to/from broker, James Hankins, re: sale of 1197 Lloyds Road Property.	B51	02548	DC	0.20	\$119.70
05/17/2022	E-mails to/from M. Conlan and E. Rosen re: motion to sell 1197 Lloyds Road Property.	B51	02548	DC	0.20	\$119.70
05/17/2022	Email with team re: draft Sale Motion papers.	B51	26059	ER	0.10	\$27.45
05/23/2022	Face Time call with T. Ashmore re: disposition of Equiti funds and accounting for Young's assets.	B51	02062	MC2	0.50	\$299.25
05/23/2022	Attend to e-mails with T. Ashmore re: title to Florida lots.	B51	02062	MC2	0.10	\$59.85
05/23/2022	Telephone call with Nancy Patterson (title agent) re: recording deed from Azimuth Family Trust and preparation of lis pendens.	B51	02062	MC2	0.20	\$119.70
05/23/2022	Review e-mails from various parties re: various aspects sale of 1197 Lloyds Road Property.	B51	02548	DC	0.30	\$179.55
05/23/2022	Confer and email with team re: Lloyd's Road deed and related filing.	B51	26059	ER	0.20	\$54.90
05/24/2022	Confer with M. Conlan re: ensuring title to 1197 Lloyd Road is effectively transferred to Bryant Sewall.	B51	02548	DC	0.10	\$59.85
05/31/2022	E-mails to/from M. Conlan re: sale of 1197 Lloyds Road.	B51	02548	DC	0.10	\$59.85
06/01/2022	Review e-mail from D. Crapo with Lis Pendens for 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$59.85
06/01/2022	Consider and determine next steps re: sale of 1197 Lloyds Road property and demands to net winners.	B51	02548	DC	0.40	\$239.40
06/01/2022	Prepare Lis Pendens for 1197 Lloyds Road property.	B51	02548	DC	0.90	\$538.65
06/01/2022	E-mails to/from Title Attorney, Nancy Patterson, re: Lis Pendens and recording deed to 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
06/03/2022	Draft letter to M. Stewart re: disposition of rare coins.	B51	02062	MC2	0.30	\$179.55
06/03/2022	E-mails to/from Nancy Patterson, title attorney, re: lis pendens.	B51	02548	DC	0.10	\$59.85
06/07/2022	Telephone call with T. Ashmore re: Equiti settlement with Cayman entities.	B51	02062	MC2	0.30	\$179.55
06/07/2022	E-mails with T. Ashmore and counsel for Cayman entities re: Equiti Settlement.	B51	02062	MC2	0.20	\$119.70
06/13/2022	Finalize Lis Pendens.	B51	02548	DC	0.10	\$59.85
06/13/2022	E-mails to/from title attorney, Nancy Patterson, re: Lis Pendens.	B51	02548	DC	0.20	\$119.70
06/13/2022	E-mail from realtor James Hankins re: sale of 1197 Lloyds Road property.	B51	02548	DC	0.10	\$59.85
06/15/2022	Review and respond to e-mails from Title Attorney, Nancy Patterson, re: 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
06/20/2022	E-mails to from realtor James Hankins and title attorney Nancy Patterson re: sale of 1197 Lloyds road property.	B51	02548	DC	0.30	\$179.55
06/23/2022	Attend to e-mails with J. Hankins and N. Patterson re: recording deed in lis pendens for 1197 Lloyds Road.	B51	02062	MC2	0.10	\$59.85

Gibbons P.C.

Time Detail
Run Date: 8/10/2022

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver for Mediatix Capital Inc.,
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
06/23/2022	Review and respond to e-mails from James Hankins, Realtor, and Title Attorney, Nancy Patterson re: title to 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
06/24/2022	E-mails to/from James Hankins, realtor, and Nancy Hankins, title attorney, re: sale of 1197 Lloyds Road property.	B51	02548	DC	0.30	\$179.55
06/24/2022	Review file to begin preparing deed to 1197 Lloyds Road property.	B51	02548	DC	0.30	\$179.55
06/27/2022	Attend to e-mails with D. Crapo, N. Patterson and J. Hankins re: form of deed for 1197 Lloyds Road.	B51	02062	MC2	0.10	\$59.85
06/30/2022	Review and respond to e-mails from J. Hankins and N. Patterson re: 1197 Lloyds Road survey.	B51	02062	MC2	0.20	\$119.70
06/30/2022	Review e-mails from various parties re: sale of 1197 Lloyds Road Property.	B51	02548	DC	0.10	\$59.85
06/30/2022	E-mails from title attorney, Nancy Patterson, re: sale of 1197 Lloyds Road Property.	B51	02548	DC	0.10	\$59.85
	Sub-Total For Task:	B51	Sale Motion/363 Sales		12.80	\$7,563.60
04/01/2022	E-mails to/from E. Rosen re: demands to charities.	B50	02548	DC	0.10	\$59.85
04/01/2022	Update contact information for 70 potential tolling agreement letters [1.5]; email and confer with team re: same [0.2].	B50	26059	ER	1.70	\$466.65
04/04/2022	E-mails to/from E. Rosen re: follow up letters to charities.	B50	02548	DC	0.10	\$59.85
04/04/2022	Email with team tolling agreement letters.	B50	26059	ER	0.10	\$27.45
04/04/2022	Draft status chart for Asset Freeze Violator tolling agreement letters.	B50	26059	ER	0.20	\$54.90
04/05/2022	E-mails with D. Barney re: retention of surveyor for 39' Sea Vee vessel.	B50	02062	MC2	0.10	\$59.85
04/05/2022	Review response from M. Stewart re: demand for the production of motor vehicle titles [0.1]; attend to follow-up e-mails with SEC counsel re: same [0.2].	B50	02062	MC2	0.30	\$179.55
04/05/2022	Review first signed tolling stipulation from a broker/dealer; e-mail to E. Rosen re: same.	B50	02548	DC	0.10	\$59.85
04/06/2022	Review signed tolling stipulation from a charity and forward to E. Rosen.	B50	02548	DC	0.10	\$59.85
04/07/2022	E-mails to/from E. Rosen and to M. Conlan re: follow-up tolling agreement letter for charities.	B50	02548	DC	0.20	\$119.70
04/07/2022	Draft follow-up tolling agreement letter for charities.	B50	02548	DC	0.50	\$299.25
04/07/2022	Review and receipt of executed broker tolling agreement [0.1]; update and annotate status chart re: broker communications [0.1].	B50	26059	ER	0.20	\$54.90
04/07/2022	Email with D. Crapo re: tolling agreement reminder for non-responsive charities.	B50	26059	ER	0.10	\$27.45
04/08/2022	Review and revise follow-up tolling letter to charities; e-mails with E. Rosen and D. Crapo re: same.	B50	02062	MC2	0.10	\$59.85
04/08/2022	Review acknowledgement from defendants Michael and Victoria Stewart.	B50	02548	DC	0.10	\$59.85
04/08/2022	E-mails to/from M. Conlan and E. Rosen re: follow-up tolling stipulations to charities [0.2]; receipt of signed broker letters [0.1].	B50	02548	DC	0.30	\$179.55
04/08/2022	Review signed broker/dealer tolling letter.	B50	02548	DC	0.10	\$59.85
04/08/2022	Email and confer with team re: tolling agreement reminder for non-responsive charities [0.1]; draft portion of letter [0.1]; prepare reminder letters and initial letters [0.5].	B50	26059	ER	0.70	\$192.15
04/11/2022	Review Tolling Agreement.	B50	02548	DC	0.10	\$59.85
04/11/2022	Review and receipt of executed broker tolling agreement [0.1]; update and annotate status chart [0.1].	B50	26059	ER	0.20	\$54.90
04/12/2022	Review and receipt of sample broker dealer complaints [0.6]; email with team re: same [0.1].	B50	26059	ER	0.70	\$192.15
04/13/2022	E-mails with former employee re: investor records.	B50	02062	MC2	0.10	\$59.85
04/13/2022	Confer with Michael Tobin re: appraisal of 1197 Lloyd's Road property.	B50	02548	DC	0.20	\$119.70
04/14/2022	Follow up on tolling agreements with broker/dealers.	B50	02548	DC	0.20	\$119.70
04/14/2022	Review transcript of Michael Young's deposition, particularly for information concerning assets.	B50	02548	DC	1.10	\$658.35
04/20/2022	E-mails to/from appraiser, Mike Tobin, re: valuation of 1197 Lloyd's Road Property.	B50	02548	DC	0.10	\$59.85
04/20/2022	Review and receipt of returned broker letters [0.1]; update chart re: same [0.1]; email with Knowledge Management to request more current addresses [0.1].	B50	26059	ER	0.30	\$82.35
04/21/2022	Coordinate re-sending of returned broker letters to more current addresses [0.2]; update chart re: same [0.1]; email with team re: same [0.1]; review and receipt of signed charity letter with tolling agreement [0.1]; update chart re: same [0.2].	B50	26059	ER	0.70	\$192.15
04/22/2022	Review and respond to e-mail from E. Rosen re: Land Rover.	B50	02548	DC	0.10	\$59.85
04/22/2022	E-mails to/from James Hankins re: 1197 Lloyd Road property.	B50	02548	DC	0.10	\$59.85
04/22/2022	Follow-up e-mail to appraiser, Mike Tobin, re: valuation of 1197 Lloyd's Road Property.	B50	02548	DC	0.10	\$59.85
04/25/2022	E-mails with D. Crapo and E. Rosen re: Arkonik Land Rover and demand for motor vehicle titles.	B50	02062	MC2	0.10	\$59.85

23
Gibbons P.C.Time Detail
Run Date: 8/10/2022

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
04/25/2022	E-mails to/from M. Conlan and E. Rosen re: defendant Michael Stewart and the Stewarts' Land Rover.	B50	02548	DC	0.40	\$239.40
04/25/2022	Draft letter to Thomas Parry of Arkonic re: Land Rover.	B50	02548	DC	0.50	\$299.25
04/25/2022	Email with team re: status of Broker Tolling Agreements.	B50	26059	ER	0.10	\$27.45
04/26/2022	Email with team re: M. Stewart tolling agreement letter.	B50	26059	ER	0.10	\$27.45
05/02/2022	Review and receipt of additional contracts and appraisal regarding 1197 Lloyds Road.	B50	26059	ER	0.20	\$54.90
05/04/2022	Email to Michael Tobin, broker, re: Broker Price Opinion for 1197 Lloyds's Road Property.	B50	02548	DC	0.10	\$59.85
05/04/2022	E-mails to broker Mike Tobin re: his Broker Price Opinion for the sale of 1197 Lloyd's Road property.	B50	02548	DC	0.10	\$59.85
05/04/2022	Review e-mail from B.S. re: distribution of Equiti payment.	B50	02548	DC	0.10	\$59.85
05/05/2022	E-mails with D. Barney, E. Rosen and J. Curtis re: digital assets.	B50	02062	MC2	0.10	\$59.85
05/09/2022	E-mail to appraiser, Mike Tobin, re: Broker Price Opinion for 1197 Lloyd Road property.	B50	02548	DC	0.10	\$59.85
05/12/2022	E-mail to broker, James Hankins, re: Broker Price Opinion for 1197 Lloyds Road property.	B50	02548	DC	0.10	\$59.85
05/12/2022	Research re: another Michael Shawn Stewart in Peoria, AZ [0.1]; confer and email with team re: same [0.2].	B50	26059	ER	0.30	\$82.35
05/13/2022	Telephone call with E. Rosen re: net winners tolling letters; e-mails with E. Rosen and D. Crapo re: same.	B50	02062	MC2	0.10	\$59.85
05/13/2022	E-mails with D. Barney re: repair of 39' motor vessel.	B50	02062	MC2	0.10	\$59.85
05/13/2022	E-mails to/from E. Rosen and from M. Conlan re: tolling letters for net winners.	B50	02548	DC	0.20	\$119.70
05/13/2022	Review SEC document production [0.1]; confer with M. Conlan re: same; email with J. Curtis re: same [0.1].	B50	26059	ER	0.20	\$54.90
05/17/2022	E-mails to/from M. Conlan re: appraisals and marketing of 1197 Lloyds Road property.	B50	02548	DC	0.20	\$119.70
05/17/2022	Review Whatley Appraisal.	B50	02548	DC	0.10	\$59.85
05/18/2022	Review Order Directing Equiti to Transfer Funds to Receiver [0.1]; attend to follow up e-mails with D. Crapo and E. Rosen re: same [0.1].	B50	02062	MC2	0.20	\$119.70
05/18/2022	Create chart of Castiglioni entity results in connection with Net Winners.	B50	26059	ER	0.30	\$82.35
05/18/2022	Review and receipt of RMA analysis of non-investor entities [0.3]; update net winner list re: same [0.3].	B50	26059	ER	0.60	\$164.70
05/23/2022	Draft detailed e-mail to J. Curtis, T. Ashmore, SEC re: accounting of Youngs' assets.	B50	02062	MC2	0.30	\$179.55
05/23/2022	Review detailed accounting of Young's assets from SEC.	B50	02062	MC2	0.20	\$119.70
05/23/2022	Telephone calls with E. Rosen re: recording Temporary Restraining Order on Lloyds Road property.	B50	02062	MC2	0.20	\$119.70
05/25/2022	Fact research on digital assets [0.2]; e-mails with M. Conforti and N. Nesvig re: same [0.1].	B50	02062	MC2	0.30	\$179.55
05/27/2022	E-mails to/from M. Conlan re: 1197 Lloyd Road property.	B50	02548	DC	0.20	\$119.70
06/01/2022	Conference call with D. Porteous, M. MacPhail and D. Barney re: Equiti.	B50	02062	MC2	0.70	\$418.95
06/01/2022	E-mails to/from Mike Tobin re: his appraisal of 1197 Lloyds Road property.	B50	02548	DC	0.20	\$119.70
06/01/2022	E-mails to/from M. Conlan re: Mike Tobin's appraisal.	B50	02548	DC	0.20	\$119.70
06/01/2022	Review accountant John Curtis' analysis of payments by Mediatrrix.	B50	02548	DC	0.20	\$119.70
06/03/2022	E-mails with SEC counsel re: rare and digital coins.	B50	02062	MC2	0.10	\$59.85
06/06/2022	E-mails with M. Conforti re: interrogatories to Michael Stewart re: coin collection.	B50	02062	MC2	0.20	\$119.70
06/06/2022	Telephone call with SEC re: coin collection.	B50	02062	MC2	0.30	\$179.55
06/06/2022	Research language regarding prior receiver agreement to segregate funds collected in connection with clawed-back charitable donations [0.1]; email with team re: same [0.1].	B50	26059	ER	0.20	\$54.90
06/08/2022	Review developments re: tolling agreements.	B50	02548	DC	0.10	\$59.85
06/09/2022	E-mails to/from M. Conlan re: strategy and next steps.	B50	02548	DC	0.10	\$59.85
06/10/2022	E-mails to/from realtor, Mike Tobin, re: broker's opinion re: 1197 Lloyds Road property.	B50	02548	DC	0.10	\$59.85
06/13/2022	E-mails to/from M. Conlan re: 1197 Lloyds Road property.	B50	02548	DC	0.20	\$119.70
06/15/2022	E-mail to E. Rosen re: Charity Defendants.	B50	02548	DC	0.10	\$59.85
06/15/2022	Confer with Equiti's counsel, Steven Senderowitz, re: motion to approve settlement.	B50	02548	DC	0.20	\$119.70
06/15/2022	Confer with E. Rosen re: procedural issues.	B50	02548	DC	0.10	\$59.85
06/17/2022	E-mails to/from M. Conlan re: Equiti settlement proceeds.	B50	02548	DC	0.20	\$119.70
06/17/2022	Confer with M. Conlan re: Equiti settlement proceeds.	B50	02548	DC	0.10	\$59.85

23
Gibbons P.C.

Time Detail
Run Date: 8/10/2022

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
06/20/2022	E-mail to M. Conlan re: Equiti settlement payment.	B50	02548	DC	0.10	\$59.85
06/23/2022	Begin preparing demand letters to Asset Protection Order violators.	B50	02548	DC	0.30	\$179.55
06/24/2022	Continue preparation of demand letters to Asset Protection Order violators.	B50	02548	DC	0.50	\$299.25
06/27/2022	Review correspondence from M. Stewart re: rare coin collection.	B50	02062	MC2	0.10	\$59.85
06/27/2022	E-mails with M. Conforti re: Stewart rare coin collection.	B50	02062	MC2	0.10	\$59.85
06/27/2022	Confer with Equiti counsel, Steven Senderowitz, re: settlement of claim against Equiti.	B50	02548	DC	0.30	\$179.55
06/27/2022	Review motion to modify Asset Freeze Order to permit the effectuation of the settlement between Equiti UK and the SEC.	B50	02548	DC	0.10	\$59.85
06/27/2022	E-mail to Raani Erekson re: transfer of funds from Equiti UK to the receiver.	B50	02548	DC	0.10	\$59.85
06/27/2022	E-mail to Equiti's counsel, Steven Senderovitz, re: transfer of settlement funds to the Receiver.	B50	02548	DC	0.30	\$179.55
Sub-Total For Task:					19.80	\$9,614.70

Total For Matter:	106202	Counsel to Mark Conlan in his capacity a	270.00	\$116,148.30
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Totals For Client:			270.00	\$116,148.30
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Gibbons P.C.

Time Summary
Run Date: 8/10/2022

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

Atty Code	Initials	Attorney Name	Position	Hours	Avg Rate	Value
02518	DEB	Barney, Dale E.	Director	18.30	\$598.50	\$10,952.55
02062	MC2	Conlan, Mark	Director	56.40	\$598.50	\$33,755.40
02548	DC	Crapo, David	Counsel	38.80	\$598.50	\$23,221.80
30541	MAC	Conforti, Michael A.	Associate	98.60	\$328.50	\$32,390.10
26059	ER	Rosen, Ellen	Case Manager	56.30	\$274.50	\$15,454.35
89266	DW	Whitford, Diane	Case Manager	0.30	\$207.00	\$62.10
40027	RT1	Traylor, Robin	Others	1.30	\$240.00	\$312.00
Totals:				270.00		\$116,148.30

Gibbons P.C.

Fee Application
Run Date: 8/10/2022

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

Task/ Code	Description Of Services	Hours	Value
RE06	Litigation Consulting	3.40	\$2,034.90
RE05	Status Reports	10.20	\$3,545.10
B62	Litigation	201.00	\$84,339.60
B58	Fee Applications	12.30	\$4,477.95
B54	Claims Administration and Objections	0.30	\$179.55
B53	Case Administration	3.20	\$1,434.60
B52	Business Operations	7.00	\$2,958.30
B51	Sale Motion/363 Sales	12.80	\$7,563.60
B50	Asset Analysis and Recovery	19.80	\$9,614.70
Totals:		270.00	\$116,148.30

Gibbons P.C.Fee Application
Run Date: 8/10/2022

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

Task Code	Description Of Services	Hours	Value
RE06	<u>Litigation Consulting</u>		
	02518 Barney, Dale E.	3.40	\$2,034.90
RE06	Litigation Consulting	3.40	\$2,034.90
RE05	<u>Status Reports</u>		
	02062 Conlan, Mark	1.50	\$897.75
	02548 Crapo, David	0.80	\$478.80
	26059 Rosen, Ellen	7.90	\$2,168.55
RE05	Status Reports	10.20	\$3,545.10
B62	<u>Litigation</u>		
	02518 Barney, Dale E.	14.40	\$8,618.40
	30541 Conforti, Michael A.	97.90	\$32,160.15
	02062 Conlan, Mark	43.30	\$25,915.05
	02548 Crapo, David	16.20	\$9,695.70
	26059 Rosen, Ellen	27.60	\$7,576.20
	40027 Traylor, Robin	1.30	\$312.00
	89266 Whitford, Diane	0.30	\$62.10
B62	Litigation	201.00	\$84,339.60
B58	<u>Fee Applications</u>		
	02062 Conlan, Mark	1.50	\$897.75
	02548 Crapo, David	1.90	\$1,137.15
	26059 Rosen, Ellen	8.90	\$2,443.05
B58	Fee Applications	12.30	\$4,477.95
B54	<u>Claims Administration and Objections</u>		
	02062 Conlan, Mark	0.30	\$179.55
B54	Claims Administration and Objections	0.30	\$179.55
B53	<u>Case Administration</u>		
	30541 Conforti, Michael A.	0.70	\$229.95
	02062 Conlan, Mark	1.60	\$957.60
	26059 Rosen, Ellen	0.90	\$247.05
B53	Case Administration	3.20	\$1,434.60
B52	<u>Business Operations</u>		
	02062 Conlan, Mark	0.30	\$179.55
	02548 Crapo, David	2.90	\$1,735.65
	26059 Rosen, Ellen	3.80	\$1,043.10
B52	Business Operations	7.00	\$2,958.30
B51	<u>Sale Motion/363 Sales</u>		
	02518 Barney, Dale E.	0.50	\$299.25
	02062 Conlan, Mark	4.20	\$2,513.70
	02548 Crapo, David	7.80	\$4,668.30
	26059 Rosen, Ellen	0.30	\$82.35
B51	Sale Motion/363 Sales	12.80	\$7,563.60
B50	<u>Asset Analysis and Recovery</u>		
	02062 Conlan, Mark	3.70	\$2,214.45
	02548 Crapo, David	9.20	\$5,506.20
	26059 Rosen, Ellen	6.90	\$1,894.05

Gibbons P.C.

Time Detail
Run Date: 8/10/2022

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

B50	Asset Analysis and Recovery	19.80	\$9,614.70
Totals:		270.00	\$116,148.30

Gibbons P.C.
 Disbursement Detail
 Run Date: 8/10/2022

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

Tran Date	Description Of Disbursement	Value
<u>Disbursement Type:</u> <u>Expedited Delivery Service (Federal Express)</u>		
04/08/2022	Expedited Delivery Service (Federal Express)	\$60.40
	Total:	\$60.40
<u>Disbursement Type:</u> <u>Filing and Miscellaneous Fees</u>		
05/12/2022	Filing and Miscellaneous Fees	\$9.48
05/12/2022	Filing and Miscellaneous Fees	\$27.03
	Total:	\$36.51
Total Disbursements:		\$96.91

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

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

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD, *et al.*,

Relief Defendants.

**ORDER APPROVING AND AUTHORIZING PAYMENT OF
RECEIVER'S AND PROFESSIONALS' FEES AND COSTS
FROM APRIL 1, 2022 THROUGH JUNE 30, 2022**

Before the Court is Mark B. Conlan's (the "Receiver") *Motion for Order Approving and Authorizing Payment of Receiver's and Professionals' Fees and Costs from April 1, 2022 through June 30, 2022* [ECF No. 357] (the "Third Quarterly Fee Application"). The Court having reviewed and considered the Third Quarterly Fee Application and all pleadings and evidence filed in support thereof, and there being no opposition to the Third Quarterly Fee Application, and good cause appearing therefore, IT IS

ORDERED that:

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

2. The following fees and costs incurred in the Third Expense Period¹, are hereby authorized to be paid from the assets in the receivership estate:

- a. The Receiver's fees in the amount of \$4,235.00; and
- b. The Receiver's counsel, Gibbons P.C.'s fees of \$116,148.30 and Gibbons' costs of \$96.91 for a total of \$116,245.21; and
- c. The Receiver's accountants, Rocky Mountain Advisory, LLC's, fees of \$17,050.00 and RMA's costs of \$111.24 for a total of \$17,161.24; and
- d. The Original Receiver firm, Robb Evans and Associates, LLC's, fees totaling \$616.95 plus costs of \$0.53 for a total of \$617.48; and
- e. The Original Receiver's counsel at Barnes & Thornburg LLP's, fees of \$1,375.40 plus costs of \$10.00 for a total of \$1,385.40.

DATED this ____ day of _____, 2022.

BY THE COURT:

RAYMOND P. MOORE
United States District Judge

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