

**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 JULY 1, 2022 THROUGH SEPTEMBER 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 payment of Receivership fees and costs incurred for the period from July 1, 2022 through the end of the quarter, September 30, 2022 (the “**Fourth Expense Period**”). The Receiver specifically moves the Court for an order approving and authorizing payment of Receivership fees and reimbursement of costs (the “**Motion**”) as follows:

a) Receiver's fees of \$2,870.00 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 \$153,668.05 and Gibbons' costs of \$1,980.28 for a total of \$155,648.33 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 \$18,567.00 and RMA's costs of \$226.92 for a total of \$18,793.92 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 \$126.90 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 \$239.20 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 fourth Quarterly Fee Application pursuant to the Receiver Order, and covers the Fourth Expense Period, from July 1, 2022 Through September 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 July 1, 2022 through September 30, 2022* [ECF No. 381] (the “**Receiver’s Fourth 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**”).¹ 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.

¹ Capitalized terms not otherwise defined herein have the meaning ascribed to such terms in the Receiver Order.

We have advised the following defendants or their counsel of this Quarterly Fee Application in advance: 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 defendant Michael S. Stewart and pro se relief defendant Victoria M. Stewart. We have been advised by counsel for the Youngs and counsel for Michael Stewart that their clients will be taking no position in connection with this Quarterly Fee Application. To date, we have not received a response from counsel for the Sewalls and their related entities.

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.

Litigation; Asset Analysis and Recovery; Sale Motion; Asset Disposition; Fee Application; Status Reports; Business Operations; Case Administration; and Claims

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 insurance brokers; real estate brokers and professional appraisers in connection with issues regarding potential avoidance claims, real property assets, personal property assets, and other assets. The Receiver has also responded to investor inquiries during the period. The majority of these communications during the Fourth 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 April 1, 2022 through June 30, 2022* [ECF No. 353] and *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] both of which were approved.

As noted in the Receiver's Third Quarterly Status Report [ECF No. 353], on May 18, 2022, an Order was entered [ECF No. 331] granting the SEC's *Motion to Modify Asset Freeze to Permit the Transfer of Funds, Including Certain Disputed Funds, from Equiti UK to the Receiver* [ECF No. 295] (the "**Equiti Motion**"). The Equiti Motion provided for the transfer of \$11,183,135.06 to the Receiver. The Receiver, his counsel and his accountants coordinated procedures for receipt of the Equiti funds, which were received on August 5, 2022 and placed in a segregated account. The Receiver's counsel also engaged in negotiations with Equiti regarding a subpoena issued for documents in Equiti's custody and ultimately received documents that may contain information regarding potentially recoverable assets.

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 continues to update 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

A motion seeking to sell the one (1) acre lot located at 1197 Lloyds Road, Oak Point, Texas for \$230,000 was filed on July 19, 2022 [ECF 347]. That motion was granted by Order entered

on August 16, 2022 [ECF 354] (the “**Sale Order**”). The Sale Order provided for an Overbid Auction, which the Receiver caused to be advertised in the Dallas Morning News in accordance with the Sale Order. The Receiver received two overbids, only one of which qualified to bid at for the Overbid Auction. The Overbid Auction was held on September 12, 2022, which resulted in a final sale price in the amount of \$303,500.

Litigation

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. Each demand letter included the Broker’s or the Net Winner’s receipts from the Receivership Defendants (net of deposits), and included settlement parameters and a draft settlement agreement.

In late July, Receiver’s counsel sent out 23 demand letters to certain Net Winners. As of the date of this report, Receiver’s counsel has: negotiated, settled and received funds in connection with 14 Net Winners; is still negotiating with 1 Net Winner; has received no response from five Net Winners; and has determined that three Net Winners are no longer worth pursuing (one under criminal indictment and assets all frozen, one in bankruptcy, and one was determined to be a net loser). See Exhibit A to Crapo Declaration for detail. To date, the Receiver has received 12 fully executed settlement agreements with Net Winners, totaling \$527,757.69.

During Q3 2022, the Receiver’s counsel sent demand letters for eight additional alleged asset freeze violators.

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 motor vehicles and a 38' motor vessel, the "M/V Currenseas", and other personal property.

During the previous 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. During the Fourth Expense Period, Mr. Stewart continued to remain non-responsive to the Receiver's continued attempts to reach out (via email and phone) to meet and confer regarding the multiple outstanding issues involving Mr. Stewart—to no avail. Ultimately on October 10, 2022, the Receiver filed a Motion for Contempt [ECF 368] which also requested that the Court compel Mr. Stewart to respond to outstanding discovery requests. The Motion was granted on October 19, 2022 [ECF 372] (the "**Contempt Order**"). The Contempt Order was stayed until November 1, 2022 [ECF No. 380].

The Receiver also issued a subpoena and received records with information from third parties regarding potential receivership assets as well as receiving responses to previously propounded subpoenas.

The Receiver's counsel also drafted follow-up demand letters and tolling letters to certain charitable entities. The Receiver is currently in negotiations with several of those entities to recover certain donations they received from Defendant Michael Young.

During Q3 2022, the Receiver's counsel also drafted demand letters and tolling letters to other potential avoidance action defendants, including certain Net Winners,

A 21-page Complaint with was filed against two charitable entities on August 31, 2022 (the “**Guardian Complaint**”). The charitable entities later demonstrated financial inability to pay and the Guardian Complaint was voluntarily dismissed without prejudice on October 18, 2022.

The Receiver’s counsel also drafted demand letters to Defendant Michael Stewart, members of his family, related entities and former counsel to Mediatrix and Blue Isle demanding repayment of transfers of receivership property they are alleged to have received and disposed of in violation of the Asset Freeze Order.

SUMMARY OF SERVICES BY OTHER RECEIVER PROFESSIONALS

Rocky Mountain Advisory Services

The majority of RMA’s services provided in the Fourth Expense Period were related to Receivership operations and included but are not limited to the following: preparation of Quarterly Report for the 2nd Quarter of 2022; communications with the Receiver and his counsel at Gibbons; review and verification of investor lists and contact information; accounting services such as receipt of funds and preparation of payments to vendors; work on tax-related matters; and forensic investigation, including analysis of recovery claims against brokers and investors receiving net profits on their investments; assisting Receiver’s counsel with evaluation of recovery claims, responses to defenses and settlements; analysis of bank and financial documents and added transactional data to transaction database for various receivership purposes. 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. The majority of communications in the Fourth Expense

Period concerned transfer of recently received Receivership assets; the Quarterly Report for the 2nd Quarter of 2022; an invoice regarding certain real property; and final insurance invoices. 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 Fourth 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 September 30, 2022 and requested in the Motion. Based on the cash on hand reported in the Receiver's Fourth Report that was filed on October 27, 2022 [ECF No. 381], the Receivership Estate was holding \$24,112,031.33 net of accrued and unpaid fees and costs totaling \$177,800.35.

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.

Respectfully submitted,

Dated: November 11, 2022

GIBBONS P.C.

By: /s/ David N. Crapo

David N. Crapo

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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 November 11, 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 to the parties as indicated on the attached service list.

/s/ David N. Crapo_____

SERVICE LIST

VIA CM/ECF and 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

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Defendant

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jordan_deckenbach@fd.org

Designation: Public Defender or Community Defender Appointment on behalf of Defendant Michael S. Stewart

Victoria M. Stewart (Pro Se)
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Relief Defendant

VIA U.S. MAIL

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Scottsdale, AZ 85255

**IN THE UNITED STATES DISTRICT COURT
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UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

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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 JULY 1, 2022 THROUGH SEPTEMBER 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 July 1, 2022 through September 30, 2022* (the "Fourth 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 Fourth 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 \$2,870.00 for the Fourth 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 \$18,567.00 and RMA's costs of \$226.92 for a total of \$18,793.92 for the Fourth 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 \$126.90 for the Fourth Expense Period.

¹ Capitalized terms not otherwise defined herein shall have the meaning ascribed to them in the Fourth 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 \$239.20 for the Fourth Expense Period.

9. In accordance with the Receiver Order, I certify that the Fourth 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 Fourth 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 November 11, 2022 at Newark, New Jersey.

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

EXHIBIT A

Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
07/26/2022	Review and revise Q2 report; attend to e-mails with E. Rosen and D. Crapo re: same.	RE05	02062	MC2	0.10	\$35.00
07/27/2022	Telephone call E. Rosen re: Q2 report.	RE05	02062	MC2	0.10	\$35.00
	Sub-Total For Task:	RE05			0.20	\$70.00
		Status Reports				
07/12/2022	Telephone call to M. Stewart re: open issues.	B62	02062	MC2	0.10	\$35.00
07/15/2022	Telephone call with D. Crapo re: Equiti settlement.	B62	02062	MC2	0.10	\$35.00
08/01/2022	Review and sign settlement agreement with net winner.	B62	02062	MC2	0.10	\$35.00
08/04/2022	E-mails with D. Crapo, counsel for Equiti and RMA re: Equiti wire transfer.	B62	02062	MC2	0.10	\$35.00
08/04/2022	Review and sign settlement stipulation with net winner.	B62	02062	MC2	0.20	\$70.00
08/04/2022	E-mails with M. Conforti re: net winner settlement.	B62	02062	MC2	0.10	\$35.00
08/05/2022	Review wire confirmation on Equiti settlement transfer.	B62	02062	MC2	0.10	\$35.00
08/08/2022	E-mails with D. Crapo re: settlements with Trendy Properties.	B62	02062	MC2	0.10	\$35.00
08/08/2022	E-mails with J. Curtis confirming receipt of Equiti wire transfer.	B62	02062	MC2	0.10	\$35.00
09/20/2022	Review wire confirmation for net winner settlement.	B62	02062	MC2	0.10	\$35.00
	Sub-Total For Task:	B62			1.10	\$385.00
		Litigation				
08/02/2022	Attend to e-mails with investor, E. Rosen and D. Crapo re: claims process.	B54	02062	MC2	0.10	\$35.00
	Sub-Total For Task:	B54			0.10	\$35.00
		Claims Administration and Objections				
08/12/2022	Attending to e-mails with E. Rosen and R. Erekson re: missing check for Express Subpoena Cayman service fees.	B53	02062	MC2	0.20	\$70.00
	Sub-Total For Task:	B53			0.20	\$70.00
		Case Administration				
07/05/2022	Attend to e-mails with R. Erekson re: approval of payment of professional fees to RMA, Robb Evans and Barnes and Thornburg.	B52	02062	MC2	0.10	\$35.00
07/05/2022	Telephone calls with SEC personnel re: Equiti wire transfer.	B52	02062	MC2	0.10	\$35.00
07/07/2022	E-mails with D. Crapo and R. Erekson re: payment of Broker Opinion of Value for 1197 Lloyds Road.	B52	02062	MC2	0.10	\$35.00
07/14/2022	Attend to insurance reimbursement check from Lee & Mason.	B52	02062	MC2	0.10	\$35.00
07/18/2022	E-mails and telephone call with E. Rosen re: updating service address on CoServ invoices for 1197 Lloyds Road property.	B52	02062	MC2	0.10	\$35.00
07/19/2022	Review insurance bill for Little Elm, TX property; e-mail same to R. Erekson for payment.	B52	02062	MC2	0.10	\$35.00
07/20/2022	E-mails with D. Crapo re: status of Equiti wire transfer.	B52	02062	MC2	0.10	\$35.00
07/21/2022	Telephone call with East West Bank re: endorsement stamp (0.1); draft follow-up e-mail to J. Curtis re: same (0.1).	B52	02062	MC2	0.20	\$70.00
07/25/2022	Attend to payment of CoServ electric bill for 1197 Lloyds Road property.	B52	02062	MC2	0.10	\$35.00
07/26/2022	Attend to e-mails with R. Erekson and D. Barney re: payment of M/V Currencies marine survey fee.	B52	02062	MC2	0.10	\$35.00
07/27/2022	Attending to e-mails with R. Erekson re: payment of Currencies marine survey and CoServ invoices.	B52	02062	MC2	0.10	\$35.00
07/28/2022	Review and approve payment of invoice for foreign service (Cayman Islands) from Express Subpoena.	B52	02062	MC2	0.10	\$35.00
07/29/2022	Review, sign and transmit wire authorization for payment of marine survey on M/V Currencies.	B52	02062	MC2	0.20	\$70.00
07/29/2022	Telephone call with East West Bank confirming outgoing wire transfer in payment of survey fees for M/V Currencies.	B52	02062	MC2	0.10	\$35.00
08/04/2022	Attending to e-mails with E. Rosen and D. Crapo re: Express Subpoena invoices.	B52	02062	MC2	0.10	\$35.00
08/16/2022	E-mails with E. Rosen and R. Erekson re: payment of Invoice for Service on Patricia Velcich.	B52	02062	MC2	0.10	\$35.00
09/09/2022	Review East West Bank Statement for August.	B52	02062	MC2	0.10	\$35.00
	Sub-Total For Task:	B52			1.90	\$665.00
		Business Operations				
07/05/2022	E-mails with counsel to certain investors (J. Golden) re: case status.	B51	02062	MC2	0.20	\$70.00
07/08/2022	E-mails with James Hankins re: purchase offers on 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$35.00
07/12/2022	Review and analyze purchase contract on 1197 Lloyds Road property (0.5); confer with D. Crapo re: same (0.1).	B51	02062	MC2	0.60	\$210.00

Gibbons P.C.

Time Detail

Run Date: 10/27/2022

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
07/12/2022	Attend to e-mails with James Hankins re: edits to sale contract for 1197 Lloyds Road property.	B51	02062	MC2	0.30	\$105.00
07/12/2022	E-mails with J. Hankins re: 1197 Lloyds Road sale contract and addendum.	B51	02062	MC2	0.20	\$70.00
07/12/2022	Telephone call with J. Hankins re: sale contract for 1197 Lloyds Road.	B51	02062	MC2	0.10	\$35.00
07/13/2022	Attend to e-mails with J. Hankins re: sale contract for 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$35.00
07/13/2022	E-mails with J. Hankins and E. Rosen re: 1197 Lloyds Road sale.	B51	02062	MC2	0.10	\$35.00
07/13/2022	Telephone call with D. Crapo re: sale of 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$35.00
07/13/2022	E-mails with parties re: sale of 1197 Lloyds Road Property.	B51	02062	MC2	0.30	\$105.00
07/14/2022	Fact research on M/V Currencies (0.2); telephone call with E. Rosen re: same (0.2).	B51	02062	MC2	0.40	\$140.00
07/14/2022	Telephone call with D. Barney re: sale of M/V Currencies.	B51	02062	MC2	0.10	\$35.00
07/15/2022	Review and respond to e-mail from J. Hankins re: marketing efforts on 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$35.00
07/15/2022	Telephone call with CoServ re: electric service at 1197 Lloyds Road (0.1); draft follow-up e-mail to E. Rosen re: same (0.1).	B51	02062	MC2	0.20	\$70.00
07/19/2022	Working telephone call with E. Rosen re: final edits to 1197 Lloyds Road sale motion.	B51	02062	MC2	0.50	\$175.00
07/26/2022	Review e-mails from D. Crapo and N. Patterson re: proposed form of deed for sale of 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$35.00
07/26/2022	E-mails with J. Hankins re: sale motion for 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$35.00
07/29/2022	Review insurance notice of continued coverage on 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$35.00
08/08/2022	Attend to \$300 check from Orange County Title with proceeds from 8221 E. Sheridan St. closing.	B51	02062	MC2	0.10	\$35.00
08/08/2022	Review and sign settlement stipulation with net winners (0.1); telephone call with M. Conforti re: same (0.1).	B51	02062	MC2	0.20	\$70.00
09/14/2022	Attend to e-mails with J. Hankins re: payment of grass cutting invoice for 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$35.00
09/27/2022	Review wire confirmation from East West Bank re: sale proceeds from 1197 Lloyds Road property; attend to e-mails with RMA re: same.	B51	02062	MC2	0.10	\$35.00
09/28/2022	E-mails with D. Barney re: repairs to M/V Currencies.	B51	02062	MC2	0.20	\$70.00
09/29/2022	Due diligence on yacht broker.	B51	02062	MC2	0.20	\$70.00
	Sub-Total For Task:	B51				
			Sale Motion/363 Sales		4.60	\$1,610.00
07/26/2022	Attend to e-mails with D. Barney re: insurance claim on M/V Currencies.	B50	02062	MC2	0.10	\$35.00
	Sub-Total For Task:	B50				
			Asset Analysis and Recovery		0.10	\$35.00
	Total For Matter:	106197		Mark Conlan in his capacity as SEC Recei	8.20	\$2,870.00
Totals For Client:					8.20	\$2,870.00

Gibbons P.C.

Time Summary
Run Date: 10/27/2022

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	8.20	\$350.00	\$2,870.00
Totals:				8.20		\$2,870.00

Gibbons P.C.

Fee Application

Run Date: 10/27/2022

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	1.10	\$385.00
B54	Claims Administration and Objections	0.10	\$35.00
B53	Case Administration	0.20	\$70.00
B52	Business Operations	1.90	\$665.00
B51	Sale Motion/363 Sales	4.60	\$1,610.00
B50	Asset Analysis and Recovery	0.10	\$35.00
Totals:		8.20	\$2,870.00

Gibbons P.C.Fee Application
Run Date: 10/27/2022

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	1.10	\$385.00
B62	Litigation	1.10	\$385.00
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	0.20	\$70.00
B53	Case Administration	0.20	\$70.00
B52	<u>Business Operations</u>		
	02062 Conlan, Mark	1.90	\$665.00
B52	Business Operations	1.90	\$665.00
B51	<u>Sale Motion/363 Sales</u>		
	02062 Conlan, Mark	4.60	\$1,610.00
B51	Sale Motion/363 Sales	4.60	\$1,610.00
B50	<u>Asset Analysis and Recovery</u>		
	02062 Conlan, Mark	0.10	\$35.00
B50	Asset Analysis and Recovery	0.10	\$35.00
Totals:		8.20	\$2,870.00

EXHIBIT B

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



October 18, 2022

Mark Conlan, Reciever
 Via Electronic Mail
 mconlan@gibbonslaw.com

Invoice Number: 16036
 Invoice Period: 07-05-2022 - 09-30-2022

Payment Terms: Net 15

RE: Mediatrix Capital

SEC v. Mediatrix

Time Details

Date	Staff Member	Description	Hours	Rate	Amount
<u>Accounting</u>					
07-08-2022	HD	Updated QuickBooks accounting data with banking detail.	0.80	230.00	184.00
07-11-2022	HD	Finish updating QuickBooks with Q2 banking detail.	0.90	230.00	207.00
07-19-2022	JHC	Reviewed communications on insurance payment and discussed with and directed R. Erekson on payment of the same.	0.30	315.00	94.50
08-02-2022	JHC	Responded to email and provided wiring instructions for incoming settlement payment.	0.30	315.00	94.50
08-08-2022	JHC	Met with and directed J. Yakumo regarding bank record import and analysis (.4). Received and recorded incoming wires and transferred large deposit to segregated client funds account (.4).	0.80	315.00	252.00
08-25-2022	JHC	Reviewed bank records and communications to confirm wire deposit and responded to counsel (.4). Correspondence with D. Crapo on accounting for M. Young investments through various entities (.2).	0.60	315.00	189.00
09-29-2022	JHC	Reviewed and recorded incoming wire for sale of property by receiver.	0.30	315.00	94.50
			4.00		1,115.50
<u>Case Administration</u>					
07-05-2022	RE	Prepare check for vendors and document for file.	0.20	90.00	18.00
07-07-2022	RE	Prepare check for vendor and document for file.	0.10	90.00	9.00
07-08-2022	HD	Begin preparation of Q2 Report.	2.00	230.00	460.00
07-11-2022	HD	Finish preparation of the Q2 report and sent to J. Curtis for review.	3.10	230.00	713.00
07-11-2022	JHC	Reviewed quarterly report details and professional fees (.5). Revised report and submitted to counsel for filing (.6).	1.10	315.00	346.50
07-27-2022	RE	Preparation of check to vendor (.1). Prepare international wire transfer for payment for	0.40	90.00	36.00

Date	Staff Member	Description	Hours	Rate	Amount
<u>Case Administration</u>					
		surveyor of Currenseas (.2). Document all for file (.1).			
07-28-2022	RE	Prepare vendor check and document for file.	0.10	90.00	9.00
08-11-2022	JC	Correspond with Stretto regarding banking system access and prepare deposit.	0.30	255.00	76.50
08-12-2022	JC	Correspond with staff regarding check deposit.	0.10	255.00	25.50
08-31-2022	RE	Prepared deposit of settlement funds and documented for the file.	0.10	90.00	9.00
09-14-2022	RE	Prepare and mail check to vendor and document for the file.	0.10	90.00	9.00
			7.60		1,711.50
<u>Fee Applications</u>					
07-07-2022	JHC	Reviewed and revised invoice for Q2 2022 and provided to Receiver's office for filing.	0.50	315.00	157.50
			0.50		157.50
<u>Forensic/Investigation</u>					
07-11-2022	JHC	Reviewed net winner analysis and responded to counsel regarding details and findings of analysis (.8). Verified various details of analysis and provided additional information to counsel (.9).	1.70	315.00	535.50
07-26-2022	JHC	Prepared various exhibits for net winner cash receipts and disbursements detail for complaint to recover excess funds received (2.8). Analyzed cash flow data for exhibits to complaint (.6).	3.40	315.00	1,071.00
07-27-2022	JHC	Reviewed net winner analyses and responded to M. Conforti emails (.5). Prepared additional exhibits of potential net winners and provided to M. Conforti and Receiver's counsel (1.1).	1.60	315.00	504.00
08-03-2022	JY	Conference with J. Curtis regarding preparing a charity payment analysis (.2). Search the transaction database for payees that were identified as charitable organizations (.3). Compile a separate list of charitable donations and prepare a summary and outline variances from the list provided by Gibbons Law (.8). Conference with J. Curtis to review findings and discuss the discrepancies from the list provided by Gibbons Law (.2). Prepare summary of discrepancies found from the schedule of charitable donations and email E. Rosen requesting clarification (.3).	1.80	240.00	432.00
08-03-2022	JHC	Met with and directed J. Yakumo on analysis of transfer to charities and preparation of schedules of such payments.	0.30	315.00	94.50
08-04-2022	JY	Analyze the charitable contribution listing provided by Gibbons Law and compare it to the detail provided by the SEC, outline variances, and prepare email to J. Curtis regarding the same (2.2). Search discovery records for an address for either Archdiocese Catholic Appeal or Archbishop Catholic Appeal, compile the related cancelled checks, perform a web-search	3.40	240.00	816.00

Date	Staff Member	Description	Hours	Rate	Amount
<u>Forensic/Investigation</u>					
		for an address and email D. Crapo regarding the same (1.2).			
08-08-2022	JY	Conference with J. Curtis regarding adding additional bank activity to the transaction database.	0.10	240.00	24.00
08-10-2022	JY	Locate and organize bank statements for Banco 1784, Banco 9843, KeyBank 0586, KeyBank 6425, UBS 2294, and UBS 8594 and upload them to OcroLus for data conversion.	1.20	240.00	288.00
08-10-2022	JHC	Call with M. Conlan on M. Young assets summary (.4). Updated M. Young summary of assets held or frozen by Receivership or disclosed by M. Young and provided to M. Conlan and M. Young counsel (1.4).	1.80	315.00	567.00
08-11-2022	JHC	Analyzed M. Pelletier investment transaction and bank records and responded to Receiver's team regarding findings relative to net winner recovery action (.9). Confirmed settlement deposits from settling parties and responded to Receiver (.3).	1.20	315.00	378.00
08-15-2022	JY	Continue to format the Perfect Audit data to prepare for import to the transaction database (.5). Conference with J. Curtis to discuss the same (.1). Worked on importing supplemental data to the transaction database (.5). Compiled account statements to prepare for alternative entry into the transaction database (.1). Import the supplemental transactions to the database and begin to complete the transaction payee/payor details for the imported items (2.5).	3.70	240.00	888.00
08-16-2022	JY	Continue to complete the transaction payee/payor details for the imported items.	2.00	240.00	480.00
08-17-2022	JHC	Reviewed data for I.T. Crude entity and responded to counsel with findings (.2). Responded to counsel email on net winner inquiry with findings (.2). Reviewed bank records and retrieved relevant documentation of wires to potential net winner (.8).	1.20	315.00	378.00
08-19-2022	JHC	Searched for data and evidence of deposits and investments of M. Young (.9). Email to D. Crapo regarding findings on investments of M. Young (.2).	1.10	315.00	346.50
08-24-2022	JY	Continue to complete the transaction payee/payor details for the imported items; populating approx. 1,332 records.	2.20	240.00	528.00
08-25-2022	JY	Identify the beginning and ending balances for Banco 1784, 9843 and Key Bank 0586, 6425 and edit the transaction database to incorporate the same to prepare for reconciliations (1.1). Continue to complete the transaction payee/payor details for the imported items, populating approx. 182 records (.8).	1.90	240.00	456.00
08-26-2022	JHC	Analyzed M. Young investments through various affiliated entities and prepared detailed listing of potential investments (1.7). Prepared email to D. Crapo describing unique deposits into non-	2.10	315.00	661.50

<u>Date</u>	<u>Staff Member</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<u>Forensic/Investigation</u>					
		Mediatrix accounts (.4).			
08-29-2022	JY	Continue to complete the transaction payee/ payor details for the imported items; populating approx. 585 records.	2.90	240.00	696.00
08-31-2022	JY	Inspect the KeyBank 6425 statements for transactions not included and populate the payee details for another 170 transactions.	1.60	240.00	384.00
09-01-2022	JY	Continue to inspect the KeyBank 6425 statements for transactions not included and populate the payee details for 128 transactions (. 9). Inspect the Banco 1784 statements for transactions not included and populate the payee details for 41 transactions (.6). Inspect the Banco 9843 statements for transactions not included and populate the payee details for 94 transactions (.8).	2.30	240.00	552.00
09-06-2022	JY	Inspect the 9/2018 and 9/2019 statements for Banco 9843 and manually enter into the database the transaction details not included and populate 256 transactions.	1.80	240.00	432.00
09-08-2022	JHC	Analyzed balances at time of asset freeze with respect to Island Technologies bank accounts, including review of bank records and summaries (.6). Responded to D. Crapo with findings (.2).	0.80	315.00	252.00
09-13-2022	JHC	Analyzed Shea/Vision Financial responses to receiver's demand and documents produced and responded to M. Comforti with comments and needed additional information.	0.90	315.00	283.50
09-15-2022	KS	Analyzed bank statement transactions to identify payments made to Autumn Gold Service.	1.30	230.00	299.00
09-15-2022	JHC	Reviewed Autumn Gold request and reviewed available bank records to respond to the same (. 3). Directed K. Swasey in compiling bank records support for payments (.2). Reviewed files and sent to M. Comforti to provide bank records supporting Autumn Gold commission payments (.6).	1.10	315.00	346.50
09-20-2022	JHC	Reviewed accounts for wire receipt (.2). Analyzed ability to pay of Premiertrade Forex based on tax returns and financial documents and provided comments to M. Conforti relative to demand for return of commissions (1.1).	1.30	315.00	409.50
09-26-2022	JHC	Analyzed S. Young investment records and documents relative to assertions regarding Jedsco 2 and other investment entities and responded to counsel (.7). Reviewed documents produced and responded to M. Conforti (.2).	0.90	315.00	283.50
			45.60		12,386.00
<u>Tax Work</u>					
09-22-2022	JG	Discuss 2021 tax return with H. Denison.	0.30	255.00	76.50
09-22-2022	HD	Finished preparation of the 2021 Federal and State tax returns and sent to J. Gifford for review.	3.90	230.00	897.00
09-23-2022	JG	Review receivership order and sale agreement for Casitas and Sheridan real property.	2.70	255.00	688.50

Date	Staff Member	Description	Hours	Rate	Amount
<u>Tax Work</u>					
09-26-2022	JG	Discuss tax return with J. Curtis (.3). Review prior year disclosures and elections (.5).	0.80	255.00	204.00
09-27-2022	JG	Review federal and state returns and discuss revisions with H. Denison.	1.30	255.00	331.50
09-30-2022	JG	Discuss return with H. Denison.	0.40	255.00	102.00
09-30-2022	HD	Met with J. Gifford to discuss changes to the tax return (.4). Researched various tax topics, made changes to the return and sent back to J. Gifford for review (3.5).	3.90	230.00	897.00
			13.30		3,196.50
			Total		18,567.00

Time Summary

Staff Member	Hours	Rate	Amount
Heather Denison	14.60	230.00	3,358.00
Jennifer Yakumo	24.90	240.00	5,976.00
John H. Curtis	23.30	315.00	7,339.50
Jordan Colohan	0.40	255.00	102.00
Josh Gifford	5.50	255.00	1,402.50
Katelyn Swasey	1.30	230.00	299.00
Raani Ereksen	1.00	90.00	90.00
Total	71.00		18,567.00

Expense Summary

Expense	Amount
Copies	5.10
Electronic Record Extraction	150.00
Overnight Expenses	58.85
PACER	8.00
Postage	4.97
Total Expenses	226.92

Total for this Invoice	18,793.92
Previous Invoice Balance	26,430.36
Payment - 1027 on 07-08-2022	(9,269.12)
Payment - 1042 on 10-10-2022	(17,161.24)
Total Amount to Pay as of 10-20-2022	18,793.92

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



Mark Conlan, Reciever
 Via Electronic Mail
 mconlan@gibbonslaw.com

October 18, 2022

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

Invoice Number: 16036
 Invoice Period: 07-05-2022 - 09-30-2022

REMITTANCE COPY

RE: Mediatrix Capital

Fees	18,567.00
Expenses	226.92
Total for this Invoice	18,793.92
Previous Invoice Balance	26,430.36
Payment - 1027 on 07-08-2022	(9,269.12)
Payment - 1042 on 10-10-2022	(17,161.24)
Total Amount to Pay as of 10-20-2022	18,793.92

Project	Balance Due
Mediatrix Capital	18,793.92
Total Amount to Pay	18,793.92

Open Invoices and Credits

Date	Transaction	Project	Amount	Applied	Balance
10-18-2022	Invoice 16036	Mediatrix Capital	18,793.92		18,793.92
				Balance	18,793.92

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 #
8/31/2022	Mediatrix25

Bill To
Mark Conlan Receiver of Mediatrix Capital

P.O. No.

Description	Qty	Rate	Amount
For professional services provided from 8/1/22 to 8/31/22 by: C. DeCius	0.2	121.50	24.30
Total			\$24.30

Fee Claims for: **Robb Evans & Associates LLC**
Case : **MEDIATRIX CAPITAL INC**
For the Month of : **August-22**
Name : **Carl DeCius**

Date	Description	Hours
8/3/22	Review billing information and correspondence for insurance. Prepare and forward final invoice to G. Caris to send to Receiver	0.20



Robb Evans & Associates LLC

11450 Sheldon Street
Sun Valley, CA 91352

Invoice

Date	Invoice #
7/31/2022	Mediatrix24

Bill To
Mark Conlan Receiver of Mediatrix Capital

P.O. No.

Description	Qty	Rate	Amount
For professional services provided from 7/1/22 to 7/31/22 by: A. Jen	0.3	342.00	102.60
Total			\$102.60

Fee Claims for: Robb Evans & Associates LLC
Case : MEDIATRIX CAPITAL INC
For the Month of : July-22
Name : Anita Jen

Date	Description	Hours
7/4/22	Received creditor email in B. Kane's email box and reply and forward email to Receiver for reply to creditor	0.10
7/11/22	received additional insurance refund check, confirm refund should be to Receiver, coordinate endorsement of check and mailing check to Receiver	0.10
7/25/22	Received refund check from Orange Costs Title Co, coordinate with C. Callahan	0.10



EXHIBIT D

BARNES & THORNBURG LLP

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

(310) 284-3880

Invoice 2645979

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

August 10, 2022
Gary O. Caris
00061044-000026

PAYABLE UPON RECEIPT

Fees for Services	\$	59.80
Other Charges	\$	<u>0.00</u>
TOTAL THIS INVOICE	\$	59.80

REMITTANCE

[REDACTED]

BARNES & THORNBURG LLP

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

(310) 284-3880

Invoice 2645979

Page 2

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

August 10, 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 July 31, 2022 as described on the attached detail.

Fees for Services \$ 59.80

TOTAL THIS INVOICE \$ **59.80**

00061044-000026 ROBB EVANS & ASSOCIATES LLC

MEDIATRIX CAPITAL, INC.

CASE ADMINISTRATION

07/07/22	GOC	Exchanged e-mails with Rosen regarding invoices for second quarter for Robb Evans and Barnes & Thornburg; exchanged e-mails with A. Jen regarding same (.2 NO CHARGE).	NO CHARGE
07/08/22	GOC	Exchanged e-mails with A. Jen regarding invoices to be sent to Conlan; redacted Barnes & Thornburg invoices for forwarding to Conlan; prepared and sent e-mails to Rosen regarding same (.4 NO CHARGE).	NO CHARGE
07/25/22	GOC	Analyzed e-mail from A. Jen regarding invoice pertaining to 1197 Lloyds Road; prepared and sent e-mail to Conlan regarding same.	0.10
SEC140	CASE ADMINISTRATION		0.10
Fees for Services Total			\$59.80

	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Gary O. Caris	0.10	\$598.00	\$59.80
TOTALS	0.10		\$59.80

BARNES & THORNBURG LLP

2029 Century Park East, Suite 3000
Los Angeles, CA 90067 U.S.A.

[REDACTED]
(310) 284-3880

Invoice 3000964

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

September 12, 2022
Gary O. Caris
00061044-00000026

PAYABLE UPON RECEIPT

Fees for Services	\$	179.40
Other Charges	\$	0.00
Total This Invoice	\$	179.40

REMITTANCE

[REDACTED]

BARNES & THORNBURG LLP

2029 Century Park East, Suite 3000
Los Angeles, CA 90067 U.S.A.

[REDACTED]
(310) 284-3880

Invoice 3000964

Page 2

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

September 12, 2022
Gary O. Caris
00061044-00000026

PAYABLE UPON RECEIPT

00061044-00000026

MEDIATRIX CAPITAL, INC.

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

Fees for Services	\$	<u>179.40</u>
Total This Invoice	\$	179.40

00061044-00000026 ROBB EVANS & ASSOCIATES LLC

Page 3

MEDIATRIX CAPITAL, INC.

Summary of Invoice

LEGAL ACTIVITIES

08/03/22	GOC	Analyzed e-mail from DeCius regarding final insurance invoices; prepared and sent e-mail to Conlan regarding same.	0.10
08/16/22	GOC	Analyzed e-mail from Gore; prepared and sent e-mails to Conlan and Crapo regarding same; analyzed e-mails between Crapo and Gore.	0.20
SEC140	CASE ADMINISTRATION		0.30
Fees for Services			\$ 179.40

	Hours	Rate	Amount
Gary O. Caris	0.30	\$598.00	\$179.40
TOTALS	0.30		\$179.40

**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 JULY 1, 2022 THROUGH SEPTEMBER 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 July 1, 2022 through September 30, 2022 (the "Fourth 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 \$153,668.05 plus costs of \$1,980.28 for a total of \$155,648.33 for the Fourth Expense Period¹.

5. In accordance with the Receiver Order, I certify that the Fourth 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 Fourth 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 November 11, 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 Fourth Quarterly Fee Application ascribed to them.

EXHIBIT A

Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
07/07/2022	Detailed email request to RMA reporting for 2nd Quarter 2022 (0.1); follow up email re: same (0.1); email with G. Caris and A. Jenn re: same (0.1).	RE05	26059	ER	0.30	\$82.35
07/07/2022	Draft Report for 2nd Quarter 2022.	RE05	26059	ER	0.40	\$109.80
07/08/2022	Draft Report for 2nd Quarter 2022.	RE05	26059	ER	1.60	\$439.20
07/11/2022	Review and respond to e-mail from E. Rosen re: discussion of sale of 1197 Lloyd's Road property in quarterly report.	RE05	02548	DC	0.20	\$119.70
07/12/2022	Review and respond to e-mails E. Rosen re: quarterly report.	RE05	02548	DC	0.20	\$119.70
07/12/2022	Draft Quarterly Report (0.9); email with RMA and team re: same (0.1).	RE05	26059	ER	1.00	\$274.50
07/15/2022	Review and revise draft of Q2 report to court.	RE05	02062	MC2	0.50	\$299.25
07/15/2022	Draft portions of 2nd Quarter Quarterly Report.	RE05	26059	ER	1.10	\$301.95
07/25/2022	Finalize portions of 2nd Quarter Quarterly Report [0.4]; email with team re: same [0.1].	RE05	26059	ER	0.50	\$137.25
07/26/2022	Review and revise quarterly report to reflect recent developments.	RE05	02548	DC	0.50	\$299.25
07/26/2022	E-mail to M. Conlan and E. Rosen re: quarterly report.	RE05	02548	DC	0.20	\$119.70
07/27/2022	Finalize 2nd Quarter Quarterly Report.	RE05	26059	ER	0.40	\$109.80
07/29/2022	Review and respond to e-mails from E. Rosen re: Quarterly Report.	RE05	02548	DC	0.20	\$119.70
07/29/2022	Prepare 2nd Quarter Quarterly Report for electronic filing (0.6); draft Certificate of Service for same (0.1); file and serve same (0.3); review and receipt of as-filed version of same (0.1); coordinate service of same (0.1); email with team re: same (0.1).	RE05	26059	ER	1.30	\$356.85
	Sub-Total For Task:	RE05	Status Reports		8.40	\$2,889.00
07/01/2022	Review and receipt of summonses in broker action.	B62	26059	ER	0.10	\$27.45
07/05/2022	Research regarding ongoing Stewart contempt issues.	B62	30541	MAC	0.40	\$131.40
07/05/2022	Research regarding Broker demand letter issues (0.2); emails with team regarding same (0.1).	B62	30541	MAC	0.30	\$98.55
07/05/2022	Review docket in criminal case.	B62	02062	MC2	0.20	\$119.70
07/05/2022	Email with team re: potential defendants.	B62	26059	ER	0.10	\$27.45
07/05/2022	Review and receipt of LaVelle and Coinbase subpoena responses.	B62	26059	ER	0.10	\$27.45
07/06/2022	Review final broker dealer complaint (0.8); emails with team re: same (0.3).	B62	02518	DEB	1.10	\$658.35
07/06/2022	Telephone call with E. Rosen re: service of foreign defendants.	B62	02062	MC2	0.10	\$59.85
07/06/2022	Review "Notices of Dishonor" from M. Stewart.	B62	02062	MC2	0.10	\$59.85
07/06/2022	Confer and email with team re: status of domestic service (0.2); docket deadlines (0.2); Internet research on non-served defendant (0.5); email with team re: same (0.1).	B62	26059	ER	1.00	\$274.50
07/07/2022	Email with team re: additional research on broker service address (0.2); additional research on broker service address (0.4); email with process server re: latest address info (0.1).	B62	26059	ER	0.70	\$192.15
07/08/2022	Review information re: diversion of funds by or at the behest of Michael Stewart.	B62	02548	DC	1.20	\$718.20
07/08/2022	Begin drafting common part of demand letter to Asset Freeze Order violators.	B62	02548	DC	5.10	\$3,052.35
07/08/2022	Confer and email with team re: additional research on broker service address (0.1); additional research on broker service address (0.4).	B62	26059	ER	0.50	\$137.25
07/11/2022	Emails with team re: broker dealer demand letters.	B62	02518	DEB	0.50	\$299.25
07/11/2022	Emails with expert regarding claim analyses.	B62	30541	MAC	0.20	\$65.70
07/11/2022	Confer with M. Conlan regarding Broker demand letters.	B62	30541	MAC	0.30	\$98.55
07/11/2022	Finalized the Broker demand letters, including attachments for each, and assisted with effecting service of same.	B62	30541	MAC	1.20	\$394.20
07/11/2022	E-mails with M. Conforti re: Stewart contempt motion.	B62	02062	MC2	0.20	\$119.70
07/11/2022	Telephone call with M. Conforti re: broker demand letters (0.1); telephone call with M. Conforti re: Stewart contempt motion (0.1).	B62	02062	MC2	0.20	\$119.70
07/11/2022	Complete draft of demand letter to Asset Freeze Order Violators.	B62	02548	DC	4.30	\$2,573.55
07/11/2022	Review e-mails between M. Conforti and John Curtis re: fee applications and brokers' letters.	B62	02548	DC	0.10	\$59.85
07/12/2022	Emails with team regarding service issues for Broker defendants.	B62	30541	MAC	0.10	\$32.85
07/12/2022	Confer with M. Conlan regarding the Michael Stewart contempt motion.	B62	30541	MAC	0.20	\$65.70
07/12/2022	Draft letter to court regarding supplementing factual record on the Michael Stewart contempt motion.	B62	30541	MAC	1.50	\$492.75
07/12/2022	Telephone calls with E. Rosen re: outstanding Stewart discovery requests.	B62	02062	MC2	0.10	\$59.85
07/12/2022	Legal research on enforcing compliance with Interrogatories to Michael Stewart.	B62	02062	MC2	0.10	\$59.85

Gibbons P.C.

Time Detail

Run Date: 10/27/2022

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
07/12/2022	Telephone call with M. Conforti re: next steps Stewart discovery.	B62	02062	MC2	0.10	\$59.85
07/12/2022	Confer with D. Barney re: service of broker summons and complaint on foreign defendants.	B62	02062	MC2	0.10	\$59.85
07/12/2022	Review and revise letter to Judge Crews re: Stewart failure to respond to discovery requests (0.2); telephone call with M. Conforti re: same (0.1).	B62	02062	MC2	0.30	\$179.55
07/12/2022	Review Judge Crews' Order Granting Receiver's Order to Show Cause; transmit same to M. Conforti.	B62	02062	MC2	0.10	\$59.85
07/12/2022	Review and receipt of latest status report on service of broker complaints as well as proof of service.	B62	26059	ER	0.10	\$27.45
07/12/2022	Emails with team and process server re: service of broker complaints.	B62	26059	ER	0.20	\$54.90
07/12/2022	Confer and email with team re: potential motion to compel.	B62	26059	ER	0.10	\$27.45
07/13/2022	Emails to/from A. Armbruster re: survey of M/V Currenseas.	B62	02518	DEB	0.30	\$179.55
07/13/2022	Edit letter regarding Stewart contempt motion.	B62	30541	MAC	0.20	\$65.70
07/13/2022	Emails with team regarding court's order granting order to show cause, including next steps.	B62	30541	MAC	0.10	\$32.85
07/13/2022	E-mails with M. Conforti re: Court's ruling on order to show cause.	B62	02062	MC2	0.10	\$59.85
07/13/2022	E-mails with D. Crapo re: Mercury Alternative Fund request for additional time to answer.	B62	02062	MC2	0.10	\$59.85
07/13/2022	Review and revise draft form of letters to asset freeze violators (1.2); e-mails with D. Crapo re: same (0.2).	B62	02062	MC2	1.40	\$837.90
07/13/2022	Review comments from D. Crapo on proposed form of demand letter to asset freeze defendants (0.1); telephone call with D. Crapo re: same (0.1).	B62	02062	MC2	0.20	\$119.70
07/13/2022	Emails with team and process server re: service of broker complaints (0.1); docket deadlines for defendant responses (0.2).	B62	26059	ER	0.30	\$82.35
07/13/2022	Review and receipt of broker demand letters (0.1); docket deadlines for defendant earliest responses to demand letters (0.1).	B62	26059	ER	0.20	\$54.90
07/14/2022	Emails to/from M. Conlan and A. Armbruster re: survey of M/V Currenseas.	B62	02518	DEB	0.30	\$179.55
07/14/2022	Review motion to hold M. Stewart in contempt and confer with M. Conlan re: same.	B62	02518	DEB	1.10	\$658.35
07/14/2022	Draft and circulate Stipulation to Extend Time to Answer the Complaint for Broker Defendant Mercury.	B62	30541	MAC	0.40	\$131.40
07/14/2022	Review broker Complaint allegations against broker Defendant Mercury.	B62	30541	MAC	0.50	\$164.25
07/14/2022	Emails with team regarding service issues with certain Broker Defendants.	B62	30541	MAC	0.10	\$32.85
07/14/2022	Research Federal Rules of Civil Procedure and Colorado Local Rules in relation to service issues.	B62	30541	MAC	0.40	\$131.40
07/14/2022	Review stipulation extending Mercury's time to answer or move.	B62	02062	MC2	0.10	\$59.85
07/14/2022	Email with team and process server re: status of service of broker complaints and next steps (0.5); review and receipt of non service affidavits (0.1).	B62	26059	ER	0.60	\$164.70
07/15/2022	Emails to/from A. Armbruster and M. Conlan re: condition and registry of M/V Currenseas.	B62	02518	DEB	0.50	\$299.25
07/15/2022	E-mails with T. Ashmore and SEC re: amending asset freeze order to permit bankruptcy filings.	B62	02062	MC2	0.10	\$59.85
07/15/2022	E-mails with E. Rosen re: briefing schedule in receivership case.	B62	02062	MC2	0.10	\$59.85
07/15/2022	Prepare Mercury Alternative Stipulation Extending Time to Answer for electronic filing; file and serve same (0.1); review and receipt of as-filed version; email with team and opposing counsel re: same (0.1).	B62	26059	ER	0.20	\$54.90
07/19/2022	Conferred with E Rosen regarding open domestic service issues.	B62	30541	MAC	0.30	\$98.55
07/19/2022	Conference call with SEC counsel re: document production and scope of protective order.	B62	02062	MC2	0.30	\$179.55
07/19/2022	E-mails with D. Crapo and D. Barney re: SEC document production.	B62	02062	MC2	0.10	\$59.85
07/19/2022	Follow up on service of Broker Defendants [0.3]; detailed email with process server re: same [0.2]; confer with M. Conforti re: same [0.2].	B62	26059	ER	0.70	\$192.15
07/21/2022	Emails with team regarding Complaints, and demand letters.	B62	30541	MAC	0.30	\$98.55
07/21/2022	Confer with M. Conlan and D Crapo regarding extensions of time for Broker Defendants to respond to complaint.	B62	30541	MAC	0.20	\$65.70
07/21/2022	Fact research for complaint and demand letters.	B62	30541	MAC	0.20	\$65.70
07/22/2022	Review emails and spreadsheets re: venue of claims (0.3); confer with M. Conforti re: same (0.2).	B62	02518	DEB	0.50	\$299.25
07/22/2022	Confer with E. Rosen regarding complaint and demand letter information.	B62	30541	MAC	0.30	\$98.55
07/22/2022	Confer with D. Barney on complaint.	B62	30541	MAC	0.10	\$32.85
07/22/2022	Finalize letter to court regarding factual addition to Stewart contempt motion.	B62	30541	MAC	0.20	\$65.70
07/22/2022	Draft 10 demand letters.	B62	30541	MAC	3.20	\$1,051.20
07/22/2022	Review and revise letter to Judge Crews re: order to show cause.	B62	02062	MC2	0.10	\$59.85

Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
07/22/2022	Telephone call with E. Rosen re: SEC document production.	B62	02062	MC2	0.10	\$59.85
07/22/2022	E-mails with D. Crapo re: Equiti settlement wire.	B62	02062	MC2	0.10	\$59.85
07/22/2022	Create tracking spreadsheet with addresses for complaints and demand letters (1.9); address research re: same (0.4); confer and email with team re: same (0.3).	B62	26059	ER	2.60	\$713.70
07/22/2022	Confer and email with team re: status of document productions.	B62	26059	ER	0.10	\$27.45
07/22/2022	Prepare letter regarding Order to Show Cause to Judge Crews for electronic filing; file and serve same; review and receipt of as-filed version (0.1); draft email to Judge Crews and notice parties; email with team re: same (0.1).	B62	26059	ER	0.20	\$54.90
07/22/2022	Researched and retrieved service address information for various individuals/entities as per E.Rosen.	B62	40027	RT1	3.10	\$821.50
07/23/2022	E-mails with M. Conforti and D. Crapo re: broker dealer action.	B62	02062	MC2	0.20	\$119.70
07/25/2022	Review M/V Currenseas survey report (0.7); emails re: same (0.4).	B62	02518	DEB	1.10	\$658.35
07/25/2022	Emails with team regarding Stewart contempt motion and Y Man broker defendant complaint.	B62	30541	MAC	0.20	\$65.70
07/25/2022	Email with team re: additional address database research re: potential net winners.	B62	26059	ER	0.10	\$27.45
07/26/2022	Review all emails re: damage to and repairs to M/V Currenseas (1.9); draft email to A. Warrington re: same (0.3).	B62	02518	DEB	2.20	\$1,316.70
07/26/2022	Emails with expert conferring regarding demand letters and complaints.	B62	30541	MAC	0.20	\$65.70
07/26/2022	Revise potential net winners spreadsheet to reflect additional address database research; email with team re: same.	B62	26059	ER	0.30	\$82.35
07/27/2022	Emails to/from team re: complaints.	B62	02518	DEB	0.60	\$359.10
07/27/2022	Review and analyze investments and withdrawals of approximately 17 separate net winners.	B62	30541	MAC	2.20	\$722.70
07/27/2022	Draft 17 separate demand letters and coordinate service of same.	B62	30541	MAC	2.40	\$788.40
07/27/2022	Review Young's Unopposed Motion to Extend Deadlines.	B62	02062	MC2	0.10	\$59.85
07/27/2022	Review and receipt of Autumn Gold Affidavit of Service and Phenom Ventures [0.1]; docket deadline for Phenom Ventures [0.1].	B62	26059	ER	0.20	\$54.90
07/27/2022	Email with process server re: status of service of broker compaints and additional address information.	B62	26059	ER	0.10	\$27.45
07/27/2022	Research and related information for potential demand letters [1.3]; prepare service list for demand letters [0.7]; update spreadsheet re: same [0.4]; email with RMA re: potential net loser [0.2]; confer and detailed email with team re: same [0.3].	B62	26059	ER	2.90	\$796.05
07/27/2022	Researched and retrieved service address information as per E. Rosen.	B62	40027	RT1	2.00	\$530.00
07/28/2022	Drafted six additional demand letters (1.1); effect service of same (0.3).	B62	30541	MAC	1.40	\$459.90
07/28/2022	Communicate with net winner regarding settlement.	B62	30541	MAC	0.40	\$131.40
07/28/2022	Review and analyze 10th Circuit's Order and Judgment affirming district court's denial of motion to unfreeze asset freeze to pay counsel fees.	B62	02062	MC2	0.40	\$239.40
07/28/2022	Prepare service list for five demand letters (0.1); update spreadsheet re: same (0.1); email with team re: same (0.1).	B62	26059	ER	0.30	\$82.35
07/28/2022	Researched and retrieved service address information as per E. Rosen.	B62	40027	RT1	1.50	\$397.50
07/29/2022	Review Notice of Acceptance from M. Stewart re: Judge Crews' ruling on order to show cause.	B62	02062	MC2	0.10	\$59.85
08/01/2022	Emails re: net winner settlement offer.	B62	02518	DEB	0.30	\$179.55
08/01/2022	Emails with team regarding demand letters and responses thereto.	B62	30541	MAC	0.10	\$32.85
08/01/2022	Communicate with via email and shared signed Settlement Agreement.	B62	30541	MAC	0.10	\$32.85
08/01/2022	Attending to e-mails with M. Conforti and D. Crapo re: avoidance settlements.	B62	02062	MC2	0.20	\$119.70
08/01/2022	Working on settlement stipulation with net winner.	B62	02062	MC2	0.20	\$119.70
08/01/2022	Review e-mail from broker representative re: settlement.	B62	02548	DC	0.20	\$119.70
08/03/2022	Emails with team regarding Broker and demand letters and responses thereto.	B62	30541	MAC	0.30	\$98.55
08/03/2022	Conferred with M. Conlan and D Crapo regarding Broker and demand letters and responses thereto.	B62	30541	MAC	0.30	\$98.55
08/03/2022	Conferred with G Borak regarding demand letters.	B62	30541	MAC	0.30	\$98.55
08/03/2022	Review e-mails from net winner and D. Crapo re: avoidance demand.	B62	02062	MC2	0.10	\$59.85
08/03/2022	Attend to e-mails with M. Conforti and D. Crapo re: avoidance demand on Premier Forex.	B62	02062	MC2	0.10	\$59.85
08/03/2022	E-mails to/from net winner and to M. Conforti re: release and settlement agreement.	B62	02548	DC	0.20	\$119.70
08/03/2022	Review and respond to e-mail from net winner expressing concerns about settlement.	B62	02548	DC	0.50	\$299.25
08/03/2022	Confer with representative of a net winner to address questions concerning settlement agreement.	B62	02548	DC	0.20	\$119.70

Gibbons P.C.

Time Detail

Run Date: 10/27/2022

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
08/03/2022	E-mails to/from M. Conlan concerning net winner concern about the settlement agreement.	B62	02548	DC	0.20	\$119.70
08/03/2022	Review settlement agreements and demand letters in preparation for negotiations with brokers and net winners.	B62	02548	DC	0.20	\$119.70
08/03/2022	Review e-mail from net winner to discuss settlement.	B62	02548	DC	0.10	\$59.85
08/03/2022	E-mails to/from M.E. Conlan and M. Conforti re: letter from net winner to discuss settlement.	B62	02548	DC	0.20	\$119.70
08/04/2022	Attention to broker complaints and responses thereto.	B62	30541	MAC	0.30	\$98.55
08/04/2022	Attention to response letter from broker defendant regarding the complaint.	B62	30541	MAC	0.30	\$98.55
08/04/2022	Attention to settlement (discussions and finalizing) for net winner.	B62	30541	MAC	0.80	\$262.80
08/04/2022	E-mails with M. Conforti re: form of settlement stipulations.	B62	02062	MC2	0.10	\$59.85
08/04/2022	E-mails to/from Equiti counsel, Steven Senderowitz, and M. Conlan re: Equiti settlement payment.	B62	02548	DC	0.20	\$119.70
08/04/2022	Finalize settlement agreement with the net winner.	B62	02548	DC	0.30	\$179.55
08/04/2022	E-mails to/from net winner, M. Conlan re: settlement.	B62	02548	DC	0.40	\$239.40
08/05/2022	Emails with team regarding settlement discussions.	B62	30541	MAC	0.20	\$65.70
08/05/2022	E-mails to/from M. Conforti and to net winner representative re: settlement.	B62	02548	DC	0.10	\$59.85
08/05/2022	Confer with net winner re: settlement.	B62	02548	DC	0.20	\$119.70
08/05/2022	E-mails to/from M. Conlan and M. Conforti re: settlement with new winner.	B62	02548	DC	0.20	\$119.70
08/08/2022	Emails with team regarding settlement discussions.	B62	30541	MAC	0.90	\$295.65
08/08/2022	Conferred with M. Conlan regarding settlement discussions.	B62	30541	MAC	0.20	\$65.70
08/08/2022	Attention to incoming settlement agreements with net winner.	B62	30541	MAC	0.50	\$164.25
08/08/2022	E-mails with D. Crapo and M. Conforti re: settlement call with Premier Trade Forex.	B62	02062	MC2	0.10	\$59.85
08/08/2022	Review and revise demand letter to S. Stewart.	B62	02062	MC2	0.40	\$239.40
08/08/2022	E-mails to/from broker representative re: settlement of fraudulent transfer claims.	B62	02548	DC	0.20	\$119.70
08/08/2022	E-mails to/from counsel for broker, M. Conlan and M. Conforti re: settlement of fraudulent transfer claims.	B62	02548	DC	0.20	\$119.70
08/08/2022	Prepare for telephone conferences with net winners re: settlement.	B62	02548	DC	0.40	\$239.40
08/08/2022	Confer with net winners re: settlement.	B62	02548	DC	0.40	\$239.40
08/08/2022	Finalize net winner settlements.	B62	02548	DC	0.50	\$299.25
08/08/2022	E-mails to/from M. Conlan re: net winner settlements.	B62	02548	DC	0.30	\$179.55
08/08/2022	Update net winner list (0.1); review and receipt of settlement documentation (0.3); email with team re: same (0.1).	B62	26059	ER	0.50	\$137.25
08/09/2022	Drafted three additional demand letters to brokers.	B62	30541	MAC	0.70	\$229.95
08/09/2022	Attention to multiple brokers regarding possible settlement.	B62	30541	MAC	0.30	\$98.55
08/09/2022	Forward settlement proposal to brokers.	B62	02548	DC	0.30	\$179.55
08/09/2022	Confer with net winner re: settlement.	B62	02548	DC	0.20	\$119.70
08/09/2022	Email and confer with team re: logistics for latest demand letters.	B62	26059	ER	0.20	\$54.90
08/10/2022	Call with net winner to discuss settlement.	B62	30541	MAC	0.40	\$131.40
08/10/2022	Drafted additional demand letters to brokers.	B62	30541	MAC	0.40	\$131.40
08/10/2022	Call with one broker Defendant's attorney to explore settlement.	B62	30541	MAC	0.20	\$65.70
08/10/2022	Prepped for call with broker Defendant's attorney to explore settlement.	B62	30541	MAC	0.30	\$98.55
08/10/2022	Attention to emails to net winners regarding settlements, coordinating with accountants, and reaching out to net winners with additional demand letters.	B62	30541	MAC	1.30	\$427.05
08/10/2022	Review Notice of Dishonor from M. Stewart re: Order to Show Cause.	B62	02062	MC2	0.10	\$59.85
08/10/2022	E-mails with M. Conforti, D. Crapo, E. Rosen and J. Curtis re: avoidance settlements.	B62	02062	MC2	0.10	\$59.85
08/10/2022	Review and signed settlement agreement with net winner (0.1); telephone call with D. Crapo re: same (0.1).	B62	02062	MC2	0.20	\$119.70
08/10/2022	Confer with M. Conlan re: settlement demands to charities, brokers and net winners.	B62	02548	DC	0.20	\$119.70
08/10/2022	Review and respond to e-mails from M. Conforti re: settlement demands to brokers and net winners.	B62	02548	DC	0.20	\$119.70
08/10/2022	Participation in conference call with M. Conforti and Larry Pino, counsel for net winner, re: settlement proposal.	B62	02548	DC	0.20	\$119.70

Gibbons P.C.

Time Detail

Run Date: 10/27/2022

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
08/10/2022	E-mails to/from Autumn Gold re: settlement proposal.	B62	02548	DC	0.20	\$119.70
08/10/2022	Review e-mail from net winner re: settlement and e-mail to M. Conlan re: same.	B62	02548	DC	0.20	\$119.70
08/10/2022	Confer with M. Conlan re: settlement demands to charities, brokers and net winners.	B62	02548	DC	0.20	\$119.70
08/10/2022	Review and respond to e-mails from M. Conlan re: settlement demands to charities, brokers and net winners.	B62	02548	DC	0.20	\$119.70
08/10/2022	Email with team and process server re: next steps on service.	B62	26059	ER	0.20	\$54.90
08/11/2022	Telephone with J. Cunningham re: repair of M/V Currenseas.	B62	02518	DEB	0.30	\$179.55
08/11/2022	Attention to settlements and ongoing discussions.	B62	30541	MAC	0.40	\$131.40
08/11/2022	Emails re: finalizing settlement.	B62	30541	MAC	0.20	\$65.70
08/11/2022	Emails with regarding settlement.	B62	30541	MAC	0.10	\$32.85
08/11/2022	Attend to e-mails with M. Conforti re: net winner settlement agreement; review and sign same.	B62	02062	MC2	0.20	\$119.70
08/11/2022	Attend to e-mails with M. Conforti and J. Curtis re: settlements.	B62	02062	MC2	0.10	\$59.85
08/11/2022	Attend to e-mails from net winner and M. Conforti re: confirming receipt of settlement funds.	B62	02062	MC2	0.10	\$59.85
08/11/2022	E-mails to/from representative of net winner re: settlement agreement.	B62	02548	DC	0.10	\$59.85
08/11/2022	E-mails to/from M. Conlan, M.A. Conlan, G. Borak and E. Rosen re: settlements with net winners.	B62	02548	DC	0.70	\$418.95
08/11/2022	Email with process server re: next steps on service.	B62	26059	ER	0.10	\$27.45
08/11/2022	Review and receipt of settlement documentation (0.3); track same on spreadsheet (0.6); confer and email with team re: demand letters (0.1).	B62	26059	ER	1.00	\$274.50
08/12/2022	Call with potential subject of claims regarding transactions.	B62	30541	MAC	0.20	\$65.70
08/12/2022	Prepare settlement/tolling letters and settlement agreements for charities.	B62	02548	DC	3.90	\$2,334.15
08/12/2022	Confer with net winner re: settlement.	B62	02548	DC	0.20	\$119.70
08/12/2022	Review and receipt of Asset Freeze Violator demand letters (0.2); update Asset Freeze Violator list (0.6); email with team re: same (0.1).	B62	26059	ER	0.90	\$247.05
08/15/2022	Emails with team discussing settlement.	B62	30541	MAC	0.10	\$32.85
08/15/2022	Prepare settlement/tolling letters and settlement agreements for charities.	B62	02548	DC	2.80	\$1,675.80
08/15/2022	Confer with net winner re: settlement.	B62	02548	DC	0.50	\$299.25
08/15/2022	Review settlement agreement with net winner.	B62	02548	DC	0.10	\$59.85
08/15/2022	E-mail to net winner re: settlement.	B62	02548	DC	0.10	\$59.85
08/16/2022	Follow up on settlement and collection issues re: charities and net winners.	B62	02548	DC	0.60	\$359.10
08/16/2022	Telephone call to net winner re: settlement.	B62	02548	DC	0.10	\$59.85
08/16/2022	Confer with Guardian Group representative re: settlement of claim.	B62	02548	DC	0.30	\$179.55
08/16/2022	E-mail to Guardian Group representative re: settlement.	B62	02548	DC	0.20	\$119.70
08/16/2022	E-mail M. Conlan and M. Conforti regarding net winner settlement.	B62	02548	DC	0.10	\$59.85
08/17/2022	Emails to/from team re: I.T. Crude and claims.	B62	02518	DEB	0.50	\$299.25
08/17/2022	Emails with team discussing claim analyses.	B62	30541	MAC	0.20	\$65.70
08/17/2022	E-mails with D. Crapo, M. Conforti and D. Barney re: litigation.	B62	02062	MC2	0.20	\$119.70
08/17/2022	Telephone call to net winner re: settlement.	B62	02548	DC	0.10	\$59.85
08/17/2022	Review and receipt of FedEx receipts for 11 demand letters (0.5); review and receipt of 6 demand letters (0.3) update charts re: status of same (0.5).	B62	26059	ER	1.30	\$356.85
08/18/2022	Emails to/from team re: claims against Jedsco.	B62	02518	DEB	0.30	\$179.55
08/18/2022	Review Jedsco demand letter.	B62	02518	DEB	0.20	\$119.70
08/18/2022	Emails with net winner discussing tolling agreement.	B62	30541	MAC	0.30	\$98.55
08/18/2022	Emails with team discussing the broker complaint and outstanding settlement offers.	B62	30541	MAC	0.20	\$65.70
08/18/2022	Emails with counsel for .	B62	30541	MAC	0.10	\$32.85
08/18/2022	Emails with net winner discussing terms of settlement.	B62	30541	MAC	0.40	\$131.40
08/18/2022	Drafted tolling agreement for a net winner.	B62	30541	MAC	0.90	\$295.65
08/18/2022	Review and respond to e-mails from M. Conforti re: settlements with various net winners.	B62	02548	DC	0.50	\$299.25
08/18/2022	E-mails to/from Byron Browne, counsel to net winner re: settlement and answer to complaint.	B62	02548	DC	0.20	\$119.70
08/18/2022	Confer with net winner re: settlement.	B62	02548	DC	0.20	\$119.70

Gibbons P.C.

Time Detail

Run Date: 10/27/2022

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
08/19/2022	Emails with discussing terms of settlement.	B62	30541	MAC	0.10	\$32.85
08/19/2022	Attend to e-mails re: net winner settlement.	B62	02062	MC2	0.10	\$59.85
08/19/2022	Review e-mails from D. Crapo, E. Rosen and M. Conforti re: Buy Investment's request for additional time to evaluate settlement offer.	B62	02062	MC2	0.10	\$59.85
08/19/2022	Attend to e-mails re: net winner settlement.	B62	02062	MC2	0.10	\$59.85
08/19/2022	E-mail to net winner's counsel, Byron Browne, re: settlement and answer.	B62	02548	DC	0.10	\$59.85
08/19/2022	E-mails to/from M. Conlan, D. Barney and M. Conforti re: net winner settlement.	B62	02548	DC	0.20	\$119.70
08/23/2022	Emails with net winner finalizing settlement.	B62	30541	MAC	0.30	\$98.55
08/23/2022	Confer with net winner re: settlement.	B62	02548	DC	0.20	\$119.70
08/23/2022	E-mails to/from M. Conlan, D. Barney and M. Conforti re: net winner settlement.	B62	02548	DC	0.20	\$119.70
08/23/2022	E-mails to/from Buy Investment Properties re: settlement.	B62	02548	DC	0.20	\$119.70
08/23/2022	E-mails to/from D. Barney, M. Conforti and Tom Krysa, counsel for net winners re: settlement.	B62	02548	DC	0.20	\$119.70
08/24/2022	Call with net winner counsel to discuss transactions.	B62	30541	MAC	0.40	\$131.40
08/24/2022	Conferred with D Crapo to strategy next step's after call with 's counsel.	B62	30541	MAC	0.10	\$32.85
08/24/2022	Revised tolling agreement with net winner and re-shared with same.	B62	30541	MAC	0.40	\$131.40
08/24/2022	Communications with net winner regarding finalizing terms of settlement agreement.	B62	30541	MAC	0.40	\$131.40
08/24/2022	Communications with net winner regarding terms of settlement agreement.	B62	30541	MAC	0.40	\$131.40
08/24/2022	Confer with Thomas Krysa, attorney for net winners re: settlement of claim.	B62	02548	DC	0.30	\$179.55
08/24/2022	Confer with Robert Welch, counsel for the Archdiocese of Philadelphia and Saint Charles Borromeo Seminary, re: settlement.	B62	02548	DC	0.20	\$119.70
08/24/2022	E-mails to/from of Buy Investment Properties re: settlement.	B62	02548	DC	0.10	\$59.85
08/25/2022	Emails with finalizing settlement.	B62	30541	MAC	0.10	\$32.85
08/25/2022	E-mails to/from Bryan Harrison, counsel for the Mercury brokers, and M. Conforti re: settlement call.	B62	02548	DC	0.20	\$119.70
08/25/2022	E-mails to/from counsel for ATP charity re: settlement.	B62	02548	DC	0.10	\$59.85
08/26/2022	Prepared for and conferred with broker Defendant's counsel to discuss broker Complaint.	B62	30541	MAC	0.40	\$131.40
08/26/2022	Reviewed documents sent by counsel response to demand letter.	B62	30541	MAC	0.20	\$65.70
08/26/2022	Participate in conference call with Mercury counsel, Bryan Harrison, re: settlement.	B62	02548	DC	0.30	\$179.55
08/26/2022	Letter to Raani Ereksan of RMA re: Trendy Properties settlement.	B62	02548	DC	0.20	\$119.70
08/26/2022	E-mails to/from counsel for the Archdiocese of Philadelphia and St. Charles Borromeo Seminary re: settlement.	B62	02548	DC	0.10	\$59.85
08/26/2022	E-mail to Pastor of St. Thomas More Catholic Parish in Centennial, CO re: settlement of avoidance claim.	B62	02548	DC	0.20	\$119.70
08/26/2022	E-mail to Pastor of Our Lady of Lourdes Catholic Church in Denver, re: settlement of avoidance claim.	B62	02548	DC	0.20	\$119.70
08/26/2022	Telephone call to Pastor of Our Lady of Lourdes Catholic Church in Denver, re: settlement of avoidance claim.	B62	02548	DC	0.10	\$59.85
08/26/2022	Telephone call to COO of the Archdiocese of Denver, re: settlement of avoidance claim.	B62	02548	DC	0.10	\$59.85
08/26/2022	Review and respond to e-mails from Chris Baumgartner, counsel to net winners re: settlement.	B62	02548	DC	0.30	\$179.55
08/29/2022	Emails with team regarding and claims and brokers' financials, including next steps.	B62	30541	MAC	0.20	\$65.70
08/29/2022	Attend to e-mails with D. Crapo and M. Conforti re: asset disclosure forms for avoidance defendants; review and revise same.	B62	02062	MC2	0.30	\$179.55
08/29/2022	E-mails to/from M. Conforti and E. Rosen re: next steps re: settlements and collections.	B62	02548	DC	0.20	\$119.70
08/30/2022	Emails to/from Gibbons team re: default judgments against certain defendants.	B62	02518	DEB	0.30	\$179.55
08/30/2022	Conferred with M. Conlan regarding open items to discuss with SEC.	B62	30541	MAC	0.10	\$32.85
08/30/2022	Emails with M. Conlan and team laying out open item agenda for call with SEC.	B62	30541	MAC	0.70	\$229.95
08/30/2022	Reviewed the documents shared by broker defendant.	B62	30541	MAC	0.80	\$262.80
08/30/2022	Prepared both individual and business asset disclosure forms for Brokers and net winners.	B62	30541	MAC	0.50	\$164.25
08/30/2022	Call with net winner counsel to explore settlement.	B62	30541	MAC	0.30	\$98.55
08/30/2022	Emails with team regarding asset disclosure forms.	B62	30541	MAC	0.70	\$229.95
08/30/2022	Email with broker defendant regarding settlement and asset disclosure form.	B62	30541	MAC	0.30	\$98.55

Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
08/30/2022	Email with Broker's counsel regarding settlement and asset disclosure form.	B62	30541	MAC	0.30	\$98.55
08/30/2022	Email with broker defendant regarding settlement and asset disclosure form.	B62	30541	MAC	0.20	\$65.70
08/30/2022	Prepared for and participated in call with SEC to discuss open items and next steps.	B62	30541	MAC	1.30	\$427.05
08/30/2022	Telephone call with M. Conforti re: open issues with avoidance claims.	B62	02062	MC2	0.10	\$59.85
08/30/2022	E-mails with team re: avoidance claims.	B62	02062	MC2	0.30	\$179.55
08/30/2022	E-mails with team re: status of SEC document production.	B62	02062	MC2	0.10	\$59.85
08/30/2022	Telephone call with D. Crapo re: avoidance claims against charities.	B62	02062	MC2	0.20	\$119.70
08/30/2022	E-mails to/from Bryan Harrison, counsel for Mercury brokers, and M. Conforti re: settlement call.	B62	02548	DC	0.20	\$119.70
08/30/2022	E-mails to/from counsel for ATP charity re: settlement.	B62	02548	DC	0.10	\$59.85
08/30/2022	Draft avoidance summary for attorneys in preparation for attorneys in preparation for meeting (0.5); review and receipt of net winner settlement (0.1); email with team and J. Curtis re: same (0.1).	B62	26059	ER	0.70	\$192.15
08/31/2022	Emails and further communications with Broker defendant exploring settlement.	B62	30541	MAC	0.60	\$197.10
08/31/2022	Reviewed financial information documents sent over by Broker.	B62	30541	MAC	0.50	\$164.25
08/31/2022	Emails with net winner exploring settlement .	B62	30541	MAC	0.20	\$65.70
08/31/2022	Worked on Rule 45 document subpoena for Equiti.	B62	30541	MAC	0.50	\$164.25
08/31/2022	Emails with net winner's counsel exploring settlement.	B62	30541	MAC	0.20	\$65.70
08/31/2022	Attend to e-mails with M. Conforti re: document subpoena to Equiti.	B62	02062	MC2	0.10	\$59.85
08/31/2022	E-mails and telephone call with M. Conforti re: document subpoena on Equiti US LLC; e-mails with D. Crapo re: same	B62	02062	MC2	0.20	\$119.70
08/31/2022	Review and revise avoidance complaint against charities (0.5); confer with D. Crapo re: same (0.1).	B62	02062	MC2	0.60	\$359.10
08/31/2022	Review e-mails between M. Conforti and Autumn Gold re: settlement of broker commissions claim against Autumn Gold.	B62	02548	DC	0.20	\$119.70
08/31/2022	Review e-mail from Tom Krysa, counsel for net winners re: settlement.	B62	02548	DC	0.20	\$119.70
08/31/2022	Assist M. Conforti with service of Subpoena for production of documents upon Equiti (0.3); assist D. Crapo with filing of Complaint against charities (0.5).	B62	26048	NM3	0.80	\$165.60
08/31/2022	Assist M. Conforti with service of Subpoena for production of documents upon Equiti.	B62	26048	NM3	0.30	\$62.10
09/01/2022	Reviewed financials of broker Defendant, for purposes of exploring settlement possibilities.	B62	30541	MAC	0.20	\$65.70
09/01/2022	Emails with net winner's counsel negotiating settlement.	B62	30541	MAC	0.20	\$65.70
09/01/2022	Attend to e-mails with M. Conforti and D. Crapo re: service of Equiti subpoena and settlement discussions with brokers and s.	B62	02062	MC2	0.20	\$119.70
09/01/2022	E-mails to/from M. Conlan and M. Conforti re: status of various settlements.	B62	02548	DC	0.20	\$119.70
09/01/2022	E-mails to/from Equiti's counsel, Steven Senderowitz, M. Conlan and M. Conforti re: subpoena of documents Equiti produced to SEC.	B62	02548	DC	0.30	\$179.55
09/01/2022	Review court notices.	B62	02548	DC	0.10	\$59.85
09/02/2022	Reviewed additional financial information shared by broker defendant.	B62	30541	MAC	0.20	\$65.70
09/02/2022	Review settlement-related correspondence from brokers and net winners (0.2); review and respond to e-mails from M. Conforti re: various settlements (0.1).	B62	02548	DC	0.30	\$179.55
09/02/2022	Review status of net winner demand.	B62	02548	DC	0.10	\$59.85
09/02/2022	E-mail to M. Conforti re: getting back in touch with counsel for Premier Trade Forex.	B62	02548	DC	0.10	\$59.85
09/02/2022	Review status of net winner/broker settlement.	B62	02548	DC	0.10	\$59.85
09/02/2022	E-mails to/from M. Conforti and to net winner/broker counsel re: settlement.	B62	02548	DC	0.20	\$119.70
09/02/2022	Assist M. Conforti with filing of Second Stipulation to Extend Time to Respond.	B62	26048	NM3	0.20	\$41.40
09/06/2022	E-mails with D. Crapo re: net winner settlement.	B62	02062	MC2	0.10	\$59.85
09/06/2022	Review and respond to e-mails from net winner re: settlement.	B62	02548	DC	0.30	\$179.55
09/06/2022	Confer with net winner re: settlement.	B62	02548	DC	0.20	\$119.70
09/06/2022	E-mails to/from M. Conlan and M. Conforti re: settlement.	B62	02548	DC	0.10	\$59.85
09/06/2022	Assist M. Conforti with service of Subpoena.	B62	26048	NM3	0.10	\$20.70
09/07/2022	Review and respond to e-mail from Owen Smith, counsel for Crown Financial Services, re: brokerage claim.	B62	02548	DC	0.10	\$59.85
09/07/2022	Review and respond to e-mail from net winner claim	B62	02548	DC	0.20	\$119.70

Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
09/07/2022	Review and respond to e-mail from net winner re: settlement.	B62	02548	DC	0.10	\$59.85
09/08/2022	Emails with net winner regarding settlement parameters.	B62	30541	MAC	0.40	\$131.40
09/08/2022	Confer with M. Conlan regarding s settlement .	B62	30541	MAC	0.10	\$32.85
09/08/2022	Emails with team regarding settlement procedures.	B62	30541	MAC	0.20	\$65.70
09/08/2022	Conferred with E Rosen regarding service strategies.	B62	30541	MAC	0.20	\$65.70
09/08/2022	E-mails with net winner and M. Conforti re: settlement.	B62	02062	MC2	0.10	\$59.85
09/08/2022	Telephone call with M. Conforti re: net winner settlement.	B62	02062	MC2	0.10	\$59.85
09/08/2022	E-mails with M. Conforti and D. Crapo re: net winner settlement.	B62	02062	MC2	0.10	\$59.85
09/08/2022	Attend to e-mails from D. Crapo and M. Conforti re: Equiti document production; review criminal docket in connection with same.	B62	02062	MC2	0.30	\$179.55
09/08/2022	E-mails to/from M. Conforti re: net winner settlement.	B62	02548	DC	0.20	\$119.70
09/08/2022	E-mails to/from M. Conlan re: net winner settlement.	B62	02548	DC	0.10	\$59.85
09/08/2022	E-mails to/from net winner re: settlement	B62	02548	DC	0.10	\$59.85
09/08/2022	E-mails to/from M. Conforti re: net winner settlement.	B62	02548	DC	0.20	\$119.70
09/08/2022	E-mails to/from net winner re Trust settlement.	B62	02548	DC	0.20	\$119.70
09/08/2022	Confer with Equiti's counsel, Steven Senderowitz, re: Equiti document production.	B62	02548	DC	0.20	\$119.70
09/08/2022	E-mail to M. Conlan re: Equiti's document production.	B62	02548	DC	0.10	\$59.85
09/09/2022	Emails with net winner finalizing settlement agreement.	B62	30541	MAC	0.20	\$65.70
09/09/2022	Emails with net winner exploring settlement.	B62	30541	MAC	0.30	\$98.55
09/09/2022	Researched for purposes of drafting Motion to Approve Settlement.	B62	30541	MAC	0.80	\$262.80
09/09/2022	Drafted Motion to Approve Settlement.	B62	30541	MAC	3.60	\$1,182.60
09/09/2022	E-mails with net winner and M. Conforti re: net winner Settlement; review and sign same.	B62	02062	MC2	0.20	\$119.70
09/09/2022	E-mails to/from M. Conforti re: settlement with Y-Man.	B62	02548	DC	0.10	\$59.85
09/09/2022	E-mails to/from M. Conforti re: settlement with net winner.	B62	02548	DC	0.10	\$59.85
09/09/2022	Review correspondence between M. Conforti re: settlement with net winner.	B62	02548	DC	0.10	\$59.85
09/09/2022	E-mails to/from counsel for net winner re: settlement.	B62	02548	DC	0.10	\$59.85
09/09/2022	E-mails to/from counsel, Byron Brown, re: settlement.	B62	02548	DC	0.10	\$59.85
09/09/2022	Confer with net winner re: settlement.	B62	02548	DC	0.20	\$119.70
09/09/2022	Researched and retrieved service address information as per E.Rosen.	B62	40027	RT1	1.00	\$265.00
09/12/2022	Confer with Owen Smith, counsel for Crown Financial Services, re: Receiver's claim.	B62	02548	DC	0.20	\$119.70
09/12/2022	Update demand/complaint chart re: status.	B62	26059	ER	0.30	\$82.35
09/13/2022	Emails with Broker regarding potential settlement.	B62	30541	MAC	0.10	\$32.85
09/13/2022	Emails with Broker defendant regarding potential settlement.	B62	30541	MAC	0.10	\$32.85
09/13/2022	Emails with net winner finalizing settlement, including wire instructions.	B62	30541	MAC	0.30	\$98.55
09/13/2022	Emails with net winner re: documentation supporting Receiver's demand letter.	B62	30541	MAC	0.20	\$65.70
09/13/2022	Reviewed documents from net winner including financials, for purposes of facilitating settlement.	B62	30541	MAC	0.30	\$98.55
09/13/2022	Draft and coordinate mailing of updated letter to net winner.	B62	30541	MAC	0.20	\$65.70
09/13/2022	Attention to net winner's bankruptcy filing and potential proof of claim.	B62	30541	MAC	0.50	\$164.25
09/13/2022	Internal emails regarding settlement positions in broker action.	B62	30541	MAC	0.20	\$65.70
09/13/2022	Call with attorney for broker defendant for purposes of factual investigation.	B62	30541	MAC	0.20	\$65.70
09/13/2022	Review and sign net winners Settlement.	B62	02062	MC2	0.10	\$59.85
09/13/2022	Review and respond to e-mail from bankruptcy trustee for net winner re: Receiver's claim in net winner's bankruptcy.	B62	02548	DC	0.20	\$119.70
09/13/2022	Review notice of net winner's bankruptcy.	B62	02548	DC	0.10	\$59.85
09/13/2022	E-mail to counsel for Crown Financial Services re: potential settlement.	B62	02548	DC	0.10	\$59.85
09/13/2022	Review e-mails from net winner re settlement of Receiver's claim.	B62	02548	DC	0.20	\$119.70
09/13/2022	E-mails to/from M. Conforti re: claim against Crown Financial Services.	B62	02548	DC	0.10	\$59.85
09/13/2022	Review and respond to e-mails from M. Conforti and M. Conlan re: net winner settlement.	B62	02548	DC	0.10	\$59.85

Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
09/13/2022	Review proposed motion for approval of non-conforming settlements.	B62	02548	DC	0.20	\$119.70
09/13/2022	Confer with M. Conforti re: Receiver's claim in net winner's bankruptcy.	B62	02548	DC	0.10	\$59.85
09/13/2022	E-mails to/from M. Conforti re: settlement with net winner.	B62	02548	DC	0.20	\$119.70
09/13/2022	Review letters to Crown Financial Services and affiliates in preparation for conference call with counsel.	B62	02548	DC	0.20	\$119.70
09/13/2022	E-mails to/from M. Conlan and M. Conforti re settlement with net winner.	B62	02548	DC	0.10	\$59.85
09/13/2022	Review e-mails from Dr. Pino re: Receiver's claims against his client.	B62	02548	DC	0.10	\$59.85
09/13/2022	E-mails to/from M. Conforti and M. Conlan re: non-conforming settlements motion.	B62	02548	DC	0.20	\$119.70
09/13/2022	Participate in Microsoft Teams meeting with M. Conforti and Crown Financial Services counsel, Owen Smith, re: settlement of Receiver's claims.	B62	02548	DC	0.30	\$179.55
09/14/2022	Complete preparation of proof of Receiver's claim in net winner's bankruptcy.	B62	02548	DC	0.30	\$179.55
09/14/2022	E-mails to/from Equiti's counsel, Stephen Senderowitz, re: subpoena.	B62	02548	DC	0.20	\$119.70
09/14/2022	E-mail to M. Conlan re: subpoena.	B62	02548	DC	0.10	\$59.85
09/14/2022	Review notices in Receiver's avoidance actions against Guardian Group and Karibu Sana	B62	02548	DC	0.20	\$119.70
09/14/2022	Review e-mail from John Curtis of RMA re: Visions Investments.	B62	02548	DC	0.10	\$59.85
09/14/2022	Confer with Steven Eager, attorney for Guardian Group, re: Receivership claim.	B62	02548	DC	0.20	\$119.70
09/14/2022	Review, receipt and organize settlement documentation [0.2]; update chart re: same [0.3].	B62	26059	ER	0.50	\$137.25
09/15/2022	Emails with net winner's counsel discussing settlement.	B62	30541	MAC	0.30	\$98.55
09/15/2022	Emails with broker defendant discussing settlement.	B62	30541	MAC	0.30	\$98.55
09/15/2022	Emails with Broker defendant discussing complaint allegations.	B62	30541	MAC	0.30	\$98.55
09/15/2022	Emails with team regarding subpoena and document review.	B62	30541	MAC	0.10	\$32.85
09/15/2022	Additional review of broker defendant's financials for purposes of facilitating settlement.	B62	30541	MAC	0.40	\$131.40
09/15/2022	Internal emails regarding recent settlements.	B62	30541	MAC	0.10	\$32.85
09/15/2022	Review and revise motion to approve net winner settlement (0.3); confer with M. Conforti re: same (0.1).	B62	02062	MC2	0.40	\$239.40
09/15/2022	E-mails with D. Crapo re: Equiti document production.	B62	02062	MC2	0.10	\$59.85
09/15/2022	E-mails with D. Crapo re: Stewarts' response to demand letters.	B62	02062	MC2	0.10	\$59.85
09/15/2022	Confer with Equiti counsel, Steven Senderowitz, re: Equiti document production.	B62	02548	DC	0.20	\$119.70
09/15/2022	E-mail to Equiti counsel, Steven Senderowitz, re: Equiti document production.	B62	02548	DC	0.10	\$59.85
09/15/2022	E-mail to M. B. Conlan re: Equiti document production.	B62	02548	DC	0.10	\$59.85
09/15/2022	E-mails to/from M. Conforti re: settlement with net winner.	B62	02548	DC	0.20	\$119.70
09/15/2022	Review response of Michael and Victoria Stewart to demand letter re: asset stay violations.	B62	02548	DC	0.10	\$59.85
09/15/2022	E-mail to M. Conlan re: next steps re: demand to Michael and Victoria Stewart.	B62	02548	DC	0.10	\$59.85
09/15/2022	Review and receipt of document production for Autumn Gold [0.2]; detailed email with team re: redaction and production logistics [0.1].	B62	26059	ER	0.30	\$82.35
09/16/2022	Emails with broker defendant regarding settlement.	B62	30541	MAC	0.20	\$65.70
09/16/2022	Reviewed broker's financials to facilitate settlement discussions.	B62	30541	MAC	0.30	\$98.55
09/16/2022	Reviewed broker defendant's documents to ascertain extent of liability.	B62	30541	MAC	0.40	\$131.40
09/16/2022	Call with boker defendant counsel regarding potential settlement.	B62	30541	MAC	0.30	\$98.55
09/16/2022	Review e-mails between M. Conforti and John Curtis of RMA and net winners.	B62	02548	DC	0.30	\$179.55
09/16/2022	E-mails to/from M. Conlan re: proposed settlements.	B62	02548	DC	0.10	\$59.85
09/16/2022	E-mails to/from Byron Browne, counsel to Y-Man, re settlement.	B62	02548	DC	0.10	\$59.85
09/16/2022	Confer with net winner re: settlement.	B62	02548	DC	0.20	\$119.70
09/16/2022	E-mails to/from M. Conforti re settlement with net winner.	B62	02548	DC	0.10	\$59.85
09/16/2022	E-mails to/from M. Conlan re: Equiti document production.	B62	02548	DC	0.10	\$59.85
09/16/2022	E-mails to/from M. Conlan re: Receiver claims against the Stewarts for violations of the Asset Freeze Order.	B62	02548	DC	0.20	\$119.70
09/16/2022	E-mails to/from net winner re settlement.	B62	02548	DC	0.50	\$299.25
09/16/2022	Participate in conference call with M. Conforti and counsel, Byron Browne, re: settlement.	B62	02548	DC	0.20	\$119.70

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Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
09/16/2022	Review and redact personal identifiers and add bates numbers for part 1 of 2 of Autumn Gold production [3.5]; email with team re: same [0.1].	B62	26059	ER	3.60	\$988.20
09/19/2022	Emails with Broker defendant regarding discovery-related documents.	B62	30541	MAC	0.10	\$32.85
09/19/2022	Emails with regarding settlement agreement.	B62	30541	MAC	0.10	\$32.85
09/19/2022	E-mails to/from Bryan Harrison, counsel to net winner re: settlement.	B62	02548	DC	0.10	\$59.85
09/19/2022	MEDIATRIX Review and redact personal identifiers and add bates numbers for part 2 of 2 of Autumn Gold production [3.3]; detailed email with team re: same [0.2].	B62	26059	ER	3.50	\$960.75
09/20/2022	Emails with team regarding settlement procedures.	B62	30541	MAC	0.20	\$65.70
09/20/2022	Conferred with M. Conlan regarding next steps.	B62	30541	MAC	0.20	\$65.70
09/20/2022	Review and analyze NOTICE OF NO ABILITY TO SUSTAIN A PERSONA STANDI IN JUDICIO by Defendants Michael S. Stewart, Victoria M. Stewart.	B62	02062	MC2	0.40	\$239.40
09/20/2022	Attend to e-mails with D. Crapo re: settlement with Mary Mother of God charity.	B62	02062	MC2	0.10	\$59.85
09/20/2022	E-mails with D. Crapo and M. Conforti re: settlement offer from .	B62	02062	MC2	0.10	\$59.85
09/20/2022	Confer with M. Conforti re: status of broker and litigation.	B62	02062	MC2	0.20	\$119.70
09/20/2022	Confer with D. Crapo status of Equiti document production.	B62	02062	MC2	0.10	\$59.85
09/20/2022	Draft e-mail to T. Ashmore re: avoidance defendant assertions.	B62	02062	MC2	0.30	\$179.55
09/20/2022	E-mails to/from counsel for a charity recipient of fraudulent transfers re: settlement.	B62	02548	DC	0.20	\$119.70
09/20/2022	Review and receipt of wire advice; update chart; email with team re: settlement funds.	B62	26059	ER	0.10	\$27.45
09/20/2022	Review and receipt of returned demand letters [0.1]; update chart re: same [0.2].	B62	26059	ER	0.30	\$82.35
09/20/2022	Research local rules regarding restrictive filings (0.3); detailed email with team re: same (0.2).	B62	26059	ER	0.50	\$137.25
09/21/2022	Conferred with E Rosen regarding motion to approve settlements.	B62	30541	MAC	0.20	\$65.70
09/21/2022	Drafted four additional settlement agreements.	B62	30541	MAC	2.00	\$657.00
09/21/2022	Emails with broker defendant re: settlement agreement and discussing next steps.	B62	30541	MAC	0.20	\$65.70
09/21/2022	Emails with Broker defendant's counsel regarding complaint.	B62	30541	MAC	0.10	\$32.85
09/21/2022	Confer with M. Young and his counsel regarding allegations against net winners.	B62	30541	MAC	0.20	\$65.70
09/21/2022	Conference call with M. Conforti, T. Ashmore and M. Young re: Garcia avoidance demand.	B62	02062	MC2	0.30	\$179.55
09/21/2022	Telephone call with M. Conforti re: Garcia avoidance demand.	B62	02062	MC2	0.10	\$59.85
09/21/2022	Review and respond to e-mail from M. Conforti re: settlements with three net winners.	B62	02548	DC	0.10	\$59.85
09/21/2022	Review e-mails between M. Conforti and net winners or brokers re: settlements.	B62	02548	DC	0.30	\$179.55
09/21/2022	E-mails to/from broker re: settlement.	B62	02548	DC	0.20	\$119.70
09/21/2022	E-mail to Thomas Hogan, counsel for Mary Mother of God charity, re: settlement.	B62	02548	DC	0.10	\$59.85
09/21/2022	E-mails to net winners re: settlement agreements	B62	02548	DC	0.30	\$179.55
09/21/2022	Review and respond to e-mail (including attachments) from Thomas Krysa, counsel for net winners re: settlement.	B62	02548	DC	0.10	\$59.85
09/21/2022	Email and confer with team re: Sealed Motion [0.3]; confer and email with chambers re: same [0.1].	B62	26059	ER	0.40	\$109.80
09/22/2022	Review and revise Lis Pendens Release (0.2); sign and e-mail same to N. Patterson (0.1).	B62	02062	MC2	0.30	\$179.55
09/22/2022	Review e-mail from Thomas Hogan, counsel for charity recipient of transfer, re: settlement.	B62	02548	DC	0.10	\$59.85
09/22/2022	Review and respond to re: settlement of net winner claim.	B62	02548	DC	0.20	\$119.70
09/22/2022	Review e-mails from Larry Pino re: settlement with his "" client.	B62	02548	DC	0.10	\$59.85
09/23/2022	Emails with broker regarding settlement terms.	B62	30541	MAC	0.20	\$65.70
09/23/2022	E-mails to/from net winner and M. Conforti re: settlement.	B62	02548	DC	0.20	\$119.70
09/23/2022	E-mails to/from net winner counsel Owen Smith and M. Conforti re: scheduling and settlement.	B62	02548	DC	0.20	\$119.70
09/23/2022	E-mail to Thomas Hogan, charity counsel, re: tolling and settlement agreement.	B62	02548	DC	0.20	\$119.70
09/23/2022	Review e-mails from net winners or their counsel to M. Conforti re: settlement.	B62	02548	DC	0.20	\$119.70
09/23/2022	File Third Stipulation of Extension of Time to file Answer per D. Crapo.	B62	26048	NM3	0.10	\$20.70
09/26/2022	Emails with broker defendant finalizing settlement.	B62	30541	MAC	0.20	\$65.70
09/26/2022	Emails net winner finalizing settlement.	B62	30541	MAC	0.20	\$65.70
09/26/2022	Emails with broker finalizing settlement.	B62	30541	MAC	0.40	\$131.40
09/26/2022	Reviewed documents from net winner related to potential claim against it.	B62	30541	MAC	0.30	\$98.55

Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
09/26/2022	Drafted settlement agreement for net winner.	B62	30541	MAC	0.60	\$197.10
09/26/2022	Revise draft motion to approve settlements.	B62	30541	MAC	2.80	\$919.80
09/26/2022	Telephone call with M. Conforti re: hardship settlements.	B62	02062	MC2	0.10	\$59.85
09/26/2022	E-mails to/from Owen Smith, counsel to Crown Capital, re: settlement conference.	B62	02548	DC	0.10	\$59.85
09/26/2022	Review e-mails between M. Conforti and net winner counsel, Christopher Baumgarten re: settlement of avoidance claim.	B62	02548	DC	0.10	\$59.85
09/26/2022	Review and respond to e-mails between M. Conforti and Larry Pino, counsel for a net winner re: settlement of avoidance claim.	B62	02548	DC	0.10	\$59.85
09/27/2022	Emails to/from M. Conlan re: payment to Compass to repair M/V Currenseas (0.1); review order (0.2).	B62	02518	DEB	0.30	\$179.55
09/27/2022	Telephone call with M. Conforti and E. Rosen re: deadlines in broker action.	B62	02062	MC2	0.10	\$59.85
09/27/2022	Review e-mail from net winner re: settlement.	B62	02548	DC	0.10	\$59.85
09/27/2022	E-mails to/from Darryl Laddin re: settlement with AMEX.	B62	02548	DC	0.20	\$119.70
09/28/2022	Emails to/from J. Cunningham and M. Conlan re: repairs to M/V Currenseas.	B62	02518	DEB	0.50	\$299.25
09/28/2022	Review survey and photos of M/V Currenseas.	B62	02518	DEB	0.60	\$359.10
09/28/2022	Research re: Bahamian Yacht broker.	B62	02518	DEB	0.40	\$239.40
09/28/2022	Telephone with and emails to A. DiBenedetto re: United Yacht Sales brokerage of M/V Currenseas.	B62	02518	DEB	1.10	\$658.35
09/28/2022	Confer with M. Conlan re: sale of M/V Currenseas .	B62	02518	DEB	0.10	\$59.85
09/28/2022	Confer with M. Conlan re: Stewart contempt motion.	B62	02518	DEB	0.20	\$119.70
09/28/2022	Emails with net winner regarding defenses to avoidance claim.	B62	30541	MAC	0.20	\$65.70
09/28/2022	Review Judge Crews' Order Denying Youngs' Motion to Terminate Receiver's Pre-Judgment Collection Activities (0.1); e-mails with T. Ashmore, SEC counsel and D. Crapo re: same (0.1).	B62	02062	MC2	0.20	\$119.70
09/28/2022	Confer with D. Barney re: preparation of contempt motion against M. Stewart.	B62	02062	MC2	0.10	\$59.85
09/28/2022	E-mails to/from CrownCapital counsel, Owen Smith, re: settlement discussions.	B62	02548	DC	0.20	\$119.70
09/28/2022	Review and respond to e-mails from net winner re: settlement.	B62	02548	DC	0.20	\$119.70
09/28/2022	E-mails to/from Thomas Hogan, counsel for Mary Mother of God Missionary Society, re: settlement of receiver's claims.	B62	02548	DC	0.20	\$119.70
09/29/2022	Draft brief to hold M. Stewart in contempt (2.5); review all prior pleadings on Order to Show Cause and exhibits (1.8); research re: same (0.8).	B62	02518	DEB	5.10	\$3,052.35
09/29/2022	Conferred with M. Conlan and D Barney regarding Stewart contempt motion.	B62	30541	MAC	0.20	\$65.70
09/29/2022	Telephone call with D. Barney and M. Conforti re: Stewart Contempt Motion.	B62	02062	MC2	0.10	\$59.85
09/29/2022	Fact research for Stewart contempt motion.	B62	02062	MC2	0.30	\$179.55
09/29/2022	Prepare for conference call with T. Ashmore and SEC counsel re: Young's proposed motion to terminate charity collection activities.	B62	02062	MC2	0.20	\$119.70
09/29/2022	Participate in conference call with T. Ashmore, D. Crapo and SEC counsel re: Young motion to terminate collection activities against charities.	B62	02062	MC2	0.40	\$239.40
09/30/2022	Review District of Colorado local rules, Judge Moore's procedures and admission application.	B62	02518	DEB	1.90	\$1,137.15
09/30/2022	Review revised scheduling order; e-mails with E. Rosen re: same.	B62	02062	MC2	0.10	\$59.85
09/30/2022	E-mails with J. Curtis and M. Conforti re: avoidance claims.	B62	02062	MC2	0.10	\$59.85
09/30/2022	Review docket in Guardian Group case.	B62	02062	MC2	0.20	\$119.70
09/30/2022	Review and revise Stewart Contempt Motion.	B62	02062	MC2	2.20	\$1,316.70
09/30/2022	E-mails with T. Ashmore and D. Crapo re: Young request to intervene in case against Guardian Group, et al.	B62	02062	MC2	0.10	\$59.85
09/30/2022	E-mail recommendation re: claim against Guardian Group to M. Conlan.	B62	02548	DC	0.20	\$119.70
09/30/2022	E-mails to/from E. Rosen re: suits against brokers.	B62	02548	DC	0.40	\$239.40
09/30/2022	E-mail complaint against charities to Michael and Maria Young's counsel, Tracy Ashmore.	B62	02548	DC	0.10	\$59.85
09/30/2022	E-mail to M. Conlan re: claims against charities.	B62	02548	DC	0.10	\$59.85
09/30/2022	Review and receipt of complaint and related filings (0.1); email with team re: summonses (0.1); docket deadlines and updated deadlines (0.2).	B62	26059	ER	0.40	\$109.80
	Sub-Total For Task:	B62	Litigation		179.50	\$79,981.90
07/06/2022	Telephone call with E. Rosen re: Q2 fee application.	B58	02062	MC2	0.10	\$59.85

Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
07/11/2022	Review e-mails between M. Conforti and John Curtis re: fee applications.	B58	02548	DC	0.10	\$59.85
08/01/2022	Telephone call with E. Rosen re: Q2 fee application.	B58	02062	MC2	0.10	\$59.85
08/01/2022	Draft 3rd Quarter Fee Application for the period April - June 2022.	B58	26059	ER	1.00	\$274.50
08/08/2022	Telephone call with E. Rosen re: fee application.	B58	02062	MC2	0.10	\$59.85
08/08/2022	Draft 2nd Quarter Fee Application for the period April - June 2022 (1.4); confer with team re: same (0.2); review and receipt of 10th Circuit Order and Judgment and Mandate (0.1).	B58	26059	ER	1.70	\$466.65
08/08/2022	Follow up with team re: Third Quarterly Fee App [0.1]; email re: address research [0.1].	B58	26059	ER	0.20	\$54.90
08/09/2022	Telephone call with E. Rosen re: Q2 fee application.	B58	02062	MC2	0.10	\$59.85
08/09/2022	Reviewing RMA invoices for Q2 fee application; e-mails with E. Rosen re: same.	B58	02062	MC2	0.20	\$119.70
08/09/2022	Telephone call with E. Rosen re: Q2 fee application.	B58	02062	MC2	0.20	\$119.70
08/09/2022	Draft 3rd Quarterly Fee Application for the 2nd Quarter 2022 period (April - June 2022) (0.3); draft declarations re: same (0.8); redact RMA invoice (0.2); draft proposed order (0.3); confer and email with team re: same (0.3).	B58	26059	ER	1.90	\$521.55
08/10/2022	Review and revise Q2 fee application (0.3); telephone call and e-mails with M. Conforti re: same (0.2).	B58	02062	MC2	0.50	\$299.25
08/10/2022	Draft 3rd Quarterly Fee Application for the 2nd Quarter 2022 period (April - June 2022) (0.4); draft declarations re: same (0.3); draft proposed order (0.2); prepare exhibits for electronic filing (0.3); confer and email with team re: same (0.1).	B58	26059	ER	1.30	\$356.85
08/11/2022	Prepare 3rd Quarterly Fee Application for the 2nd Quarter 2022 period (April - June 2022) along with Declarations, Exhibits, and Proposed Orders for submission to SEC review process (0.9); email with team re: same (0.1).	B58	26059	ER	1.00	\$274.50
09/08/2022	Email with SEC re: review of 2nd Quarter Fee Application; email with team re: same.	B58	26059	ER	0.10	\$27.45
09/12/2022	Telephone call with E. Rosen re: Q2 fee application; e-mail with SEC team re: same.	B58	02062	MC2	0.10	\$59.85
09/12/2022	Email and confer with team re: quarterly fee application status.	B58	26059	ER	0.20	\$54.90
09/13/2022	Email 3rd Quarterly Fee Application to opposing counsel and pro se defendants for approval or objection [0.2]; prepare same for electronic filing along with Declarations, Exhibits, and Proposed Order [0.8]; file and serve same [0.2]; review and receipt of as-filed version [0.1]; coordinate service [0.2]; confer and email with team re: quarterly fee application [0.3].	B58	26059	ER	1.80	\$494.10
09/15/2022	Fee application preparation.	B58	02548	DC	0.20	\$119.70
	Sub-Total For Task:	B58			10.90	\$3,542.85
						Fee Applications
07/27/2022	E-mails with M. Conforti re: claims.	B54	02062	MC2	0.10	\$59.85
08/08/2022	E-mails with D. Barney re: insurance claim on M/V Currencies.	B54	02062	MC2	0.10	\$59.85
08/08/2022	Telephone call with D. Crapo re: third party claims.	B54	02062	MC2	0.20	\$119.70
09/08/2022	E-mails to/from Hayley Sanders of FX Strategy Master Fund re: settlement.	B54	02548	DC	0.10	\$59.85
	Sub-Total For Task:	B54			0.50	\$299.25
						Claims Administration and Objections
07/05/2022	E-mails with M. Conforti, D. Barney and E. Rosen re: service on New Zealand entities.	B53	02062	MC2	0.20	\$119.70
08/03/2022	Draft detailed e-mail to team re: case status.	B53	02062	MC2	0.30	\$179.55
08/03/2022	E-mails with M. Conforti re: service of broker-dealer demand letters.	B53	02062	MC2	0.10	\$59.85
08/04/2022	Review and analyze letter from broker defendant; draft follow-up e-mail to D. Crapo and M. Conforti re: same.	B53	02062	MC2	0.40	\$239.40
08/04/2022	E-mails with E. Rosen and D. Crapo re: response to investor's request for tax advice.	B53	02062	MC2	0.10	\$59.85
08/17/2022	E-mails with D. Crapo re: access to Equiti documents.	B53	02062	MC2	0.10	\$59.85
08/30/2022	Review docket in Receivership case.	B53	02062	MC2	0.10	\$59.85
	Sub-Total For Task:	B53			1.30	\$778.05
						Case Administration
07/01/2022	Add Order Granting Receiver and Professional Fees and Costs for First Quarter 2022 to Substantive Pleadings on mediatixreceivership website.	B52	26059	ER	0.10	\$27.45
07/05/2022	Review and receipt of investor inquiries and receiver responses (0.1); email with investor re: latest quarterly report (0.1).	B52	26059	ER	0.20	\$54.90
07/06/2022	E-mails to/from M. Conlan re: status of Equiti payment.	B52	02548	DC	0.10	\$59.85
07/06/2022	Review and organize investor inquiries and receiver responses.	B52	26059	ER	0.10	\$27.45
07/07/2022	Review and receipt of investor inquiry from investor T.C.	B52	26059	ER	0.10	\$27.45

Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
07/18/2022	Follow up on 1197 Lloyd's utility invoices [0.2]; detailed email to CoServe re: same [0.3].	B52	26059	ER	0.50	\$137.25
07/19/2022	Follow up on 1197 Lloyd's utility invoices [0.1]; confer with M. Conlan re: same [0.1].	B52	26059	ER	0.20	\$54.90
07/20/2022	Telephone call with SEC re: status of document production.	B52	02062	MC2	0.10	\$59.85
07/20/2022	Post 1197 Lloyds Sale Motion on mediatrix website.	B52	26059	ER	0.20	\$54.90
07/28/2022	Email with Express Process Service, team, and R. Ereckson re: Cayman Islands service.	B52	26059	ER	0.20	\$54.90
07/29/2022	Post as-filed Quarterly Report for 2nd Quarter 2022 to Substantive Pleadings and Case News on mediatrixreceivership.com website.	B52	26059	ER	0.40	\$109.80
08/01/2022	Call CoServe re transferring account to current receiver (0.1); email with team re: CoServe account (0.2); confer with team re: same (0.1).	B52	26059	ER	0.40	\$109.80
08/16/2022	Transmit settlement payment from Trendy Properties to Rocky Mountain Advising.	B52	02548	DC	0.10	\$59.85
08/17/2022	Post Sale Order to mediatrixreceivership.com website.	B52	26059	ER	0.10	\$27.45
09/08/2022	Detailed email with team re: creditor inquiry.	B52	26059	ER	0.30	\$82.35
09/14/2022	Update Mediatrix website with latest Quarterly Fee Application [0.2]; email with team re: same [0.1].	B52	26059	ER	0.30	\$82.35
09/26/2022	Attend to e-mails with D. Crapo and N. Patterson re: wiring closing funds; telephone call with D. Crapo re: same.	B52	02062	MC2	0.10	\$59.85
	Sub-Total For Task:	B52	Business Operations		3.50	\$1,090.35
06/13/2022	E-mail from realtor James Hankins re: sale of 1197 Lloyds Road property.	B51	02548	DC	0.10	\$59.85
07/13/2022	Review and revise draft sale motion for 1197 Lloyds Road property.	B51	02062	MC2	0.20	\$119.70
07/13/2022	Review and execute sale contract and addendum for sale of 1197 Lloyds Road property.	B51	02062	MC2	0.60	\$359.10
07/13/2022	Draft motion to sell 1197 Lloyds Road property.	B51	02548	DC	3.20	\$1,915.20
07/13/2022	Review e-mails from M. Conlan and E. Rosen re: motion to sell 1197 Lloyds Road property.	B51	02548	DC	0.10	\$59.85
07/13/2022	E-mails to/from James Hankins, broker, re: sale of 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
07/13/2022	Review and receipt of detailed email regarding 1197 Lloyds; email with team re: same,	B51	26059	ER	0.10	\$27.45
07/13/2022	Draft portions of Sale Motion.	B51	26059	ER	1.00	\$274.50
07/14/2022	Review and revise 1197 Lloyds Road sale motion.	B51	02062	MC2	0.50	\$299.25
07/14/2022	E-mails with D. Barney re: M/V Currencies.	B51	02062	MC2	0.10	\$59.85
07/14/2022	Attend to e-mails from D. Crapo, J. Hankins and N. Patterson re: sale of 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$59.85
07/14/2022	E-mails with E. Rosen and D. Crapo re: need for forthwith motion in connection with the sale of 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$59.85
07/14/2022	Further revisions to the 1197 Lloyds Road sale motion.	B51	02548	DC	1.00	\$598.50
07/14/2022	E-mails to/from M. Conlan re: status of 1197 Lloyds Road sale motion.	B51	02548	DC	0.20	\$119.70
07/14/2022	Confer with M. Conlan re: status of 1197 Lloyds Road property.	B51	02548	DC	0.10	\$59.85
07/14/2022	E-mails to/from E. Rosen re: certification in support of the 1197 Lloyds Road sale motion and the proposed order approving the sale.	B51	02548	DC	0.10	\$59.85
07/14/2022	E-mails to/from E. Rosen and from M. Conlan re: expediting 1197 Lloyds Road sale motion.	B51	02548	DC	0.10	\$59.85
07/14/2022	E-mails to/from title attorney, Nancy Patterson, re: sale of 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
07/14/2022	Review and respond to e-mail from listing agent, James Hankins, re: 1197 Lloyds Road Sale Motion.	B51	02548	DC	0.30	\$179.55
07/14/2022	Review certification in support of 1197 Lloyds Road sale motion.	B51	02548	DC	0.10	\$59.85
07/14/2022	Email with D. Crapo re: first appraisal for Lloyds property.	B51	26059	ER	0.10	\$27.45
07/14/2022	Draft portions of Sale Motion; draft declaration in support of Sale Motion (0.5); draft proposed order (0.4); email with team re: same (0.1).	B51	26059	ER	1.00	\$274.50
07/15/2022	Attend to e-mails with J. Hankins, E. Rosen and D. Crapo re: sale motion for 1197 Lloyds Road property.	B51	02062	MC2	0.40	\$239.40
07/15/2022	Review proposed form of order approving sale of 1197 Lloyds Road Property; review prior sale orders (0.2); e-mails with E. Rosen and D. Crapo re: same (0.1).	B51	02062	MC2	0.30	\$179.55
07/15/2022	E-mails with D. Crapo and E. Rosen re: correcting property description for 1197 Lloyds Road sale motion.	B51	02062	MC2	0.10	\$59.85
07/15/2022	E-mails to/from M. Conlan and E. Rosen re: 1197 Lloyds Road sale motion.	B51	02548	DC	0.90	\$538.65
07/15/2022	Review and respond to e-mail from listing agent, James Hankins, re: 1197 Lloyds Road analysis.	B51	02548	DC	0.10	\$59.85
07/15/2022	Review of and revisions to 1197 Lloyds Road sale pleadings to reflect information from James Hankins and for conformity to similar sales.	B51	02548	DC	3.60	\$2,154.60

Gibbons P.C.

Time Detail

Run Date: 10/27/2022

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
07/15/2022	Review and receipt of sale-related documentation.	B51	26059	ER	0.20	\$54.90
07/15/2022	Email with team re: Sale Motion (0.1); prepare Sale Motion Declaration exhibits 1-3 for electronic filing (0.2).	B51	26059	ER	0.30	\$82.35
07/18/2022	Reviewing and revise sale motion for 1197 Lloyds Road (1.4); legal research in support of same (0.8).	B51	02062	MC2	2.20	\$1,316.70
07/18/2022	Telephone call with D. Crapo re: 1197 Lloyd Road sale motion.	B51	02062	MC2	0.10	\$59.85
07/18/2022	Review and revise proposed form of order approving sale of 1197 Lloyds Road property.	B51	02062	MC2	0.40	\$239.40
07/18/2022	E-mails with D. Crapo and E. Rosen re: proposed form of order approving sale of 1197 Lloyds Road; revisions to same.	B51	02062	MC2	0.20	\$119.70
07/18/2022	Review and respond to e-mails from E. Rosen re: 1197 Lloyds Road sale motion and proposed order.	B51	02548	DC	0.30	\$179.55
07/18/2022	Further revisions to 1197 Lloyds Road sale motion and proposed order.	B51	02548	DC	0.80	\$478.80
07/18/2022	E-mails to/from M. Conlan re: 1197 Lloyds Road sale motion and proposed order.	B51	02548	DC	0.40	\$239.40
07/18/2022	Confer with M. Conlan re: 1197 Lloyds Road sale motion and proposed order.	B51	02548	DC	0.10	\$59.85
07/18/2022	Detailed email with team re: Property description for 1197 Sale Motion (0.1); prepare exhibit for declaration in support of same (0.1).	B51	26059	ER	0.20	\$54.90
07/19/2022	Telephone conference with E. Rosen re: 1197 Lloyds Road sale motion.	B51	02548	DC	0.10	\$59.85
07/19/2022	Final review of 1197 Lloyds Road sale motion and proposed order.	B51	02548	DC	0.30	\$179.55
07/19/2022	Confer with M. Conlan re: Sale Motion and related filings [0.2]; revise portions of Sale Motion, Declaration and Proposed Order [0.3]; prepare Sale Motion, Declaration, Exhibits, and Proposed Order for electronic filing [0.3]; file and serve same [0.3]; review and receipt of as-filed versions of same [0.1]; coordinate service of same [0.2]; confer and email with team re: same [0.3].	B51	26059	ER	1.70	\$466.65
07/20/2022	Begin review of title commitment re: 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
07/20/2022	Review e-mails from Nancy Patterson re: sale of 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
07/25/2022	Review and consider changes to proposed survey affidavit for 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
07/26/2022	Review and respond to e-mails from listing agent, James Hankins, re: sale of 1197 Lloyds Road property.	B51	02548	DC	1.30	\$778.05
07/26/2022	Prepare deed for 1197 Lloyds Road property.	B51	02548	DC	0.50	\$299.25
07/26/2022	Draft overbid notice for 1197 Lloyds Road property.	B51	02548	DC	0.50	\$299.25
07/26/2022	E-mails to/from title attorney, Nancy Patterson, re: sale of 1197 Lloyds Road Property.	B51	02548	DC	0.60	\$359.10
07/27/2022	E-mails to/from Nancy Patterson, title counsel, re: sale of 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
07/27/2022	Review overbid notice for 1197 Lloyds Road property.	B51	02548	DC	0.10	\$59.85
07/28/2022	E-mails to/from Nancy Patterson, title counsel, re: sale of 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
07/28/2022	Review overbid notice for 1197 Lloyds Road property.	B51	02548	DC	0.10	\$59.85
07/29/2022	Review and respond to e-mails from listing agent, James Hankins re: status of sale of 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
08/03/2022	Review and respond to e-mail from listing agent, James Hankins, re: sale of 1197 Lloyds Road property.	B51	02548	DC	0.10	\$59.85
08/05/2022	E-mails with D. Crapo and J. Magee at Holland & Knight re: PwC appointment as liquidator in the Bahamas.	B51	02062	MC2	0.10	\$59.85
08/05/2022	Attend to e-mails with D. Crapo and M. Conforti. re: demand letter settlements.	B51	02062	MC2	0.10	\$59.85
08/05/2022	E-mails with J. Harris re: receipt of settlement funds.	B51	02062	MC2	0.10	\$59.85
08/08/2022	Teams call with Jessica Magee, Warren Gluck and D. Crapo re: Bahamas liquidator.	B51	02062	MC2	0.40	\$239.40
08/08/2022	E-mails with M. Conforti re: settlement negotiations with net winners.	B51	02062	MC2	0.30	\$179.55
08/09/2022	E-mails with J. Hankins, D. Crapo and E. Rosen re: status of sale motion; telephone call with E. Rosen re: same.	B51	02062	MC2	0.20	\$119.70
08/09/2022	Email with J. Hankins re: status of Sale Motion (0.1); confer and email with team re: same (0.1).	B51	26059	ER	0.20	\$54.90
08/12/2022	E-mails with E. Rosen re: status of 1197 Lloyds Road sale motion.	B51	02062	MC2	0.10	\$59.85
08/15/2022	E-mails with J. Hankins and E. Rosen re: 1197 sale.	B51	02062	MC2	0.10	\$59.85
08/15/2022	E-mails to/from James Hankins re: 1197 Lloyds Road sale motion.	B51	02548	DC	0.10	\$59.85
08/15/2022	Confer with E. Rosen re: 1197 Lloyds Road sale motion.	B51	02548	DC	0.10	\$59.85
08/15/2022	Confer with chambers re: status of Sale Motion (0.1); email with J. Hankins re: same (0.1); confer with D. Crapo re: same (0.1).	B51	26059	ER	0.30	\$82.35
08/16/2022	Review 1197 Lloyds Road Sale Order.	B51	02548	DC	0.10	\$59.85

Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
08/16/2022	E-mail to listing agent, James Hankins, re: 1197 Lloyds Road sale order.	B51	02548	DC	0.10	\$59.85
08/16/2022	Review and receipt of Sale Order (0.1); email with team re: same (0.1).	B51	26059	ER	0.20	\$54.90
08/17/2022	E-mails with D. Crapo re 1197 Lloyd's Road sale order; review same.	B51	02062	MC2	0.20	\$119.70
08/23/2022	Attend to e-mails with D. Crapo re: financial distress settlement.	B51	02062	MC2	0.10	\$59.85
08/25/2022	E-mails to/from listing agent, James Hankins, re: status of 1197 Lloyds Road sale.	B51	02548	DC	0.10	\$59.85
08/26/2022	Confer with Max Tezkol of Dallas Morning News re: public notice of 1197 Lloyds Road overbid notice.	B51	02548	DC	0.30	\$179.55
08/26/2022	E-mails to/from listing agent, James Hankins, title attorney, Nancy Patterson; and M. Conlan re: 1197 Lloyds Road overbid session notice.	B51	02548	DC	0.60	\$359.10
08/26/2022	Prepare public notice of 1197 Lloyds Road overbid.	B51	02548	DC	1.70	\$1,017.45
08/26/2022	E-mail to Max Tezkol of Dallas Morning News re: public notice of 1197 Lloyds Road overbid notice.	B51	02548	DC	0.10	\$59.85
08/29/2022	Attend to e-mails with team re: response to demand letter from net winner.	B51	02062	MC2	0.20	\$119.70
08/29/2022	E-mails to/from listing agent, James Hankins, and E. Rosen re: notice of 1197 Lloyds Road sale and overbid session.	B51	02548	DC	0.20	\$119.70
08/30/2022	Attend to e-mails with D. Crapo and J. Curtis re: net winner settlement discussions.	B51	02062	MC2	0.10	\$59.85
08/30/2022	E-mails with team re: net winner settlement.	B51	02062	MC2	0.10	\$59.85
08/30/2022	Preparing agenda for SEC call.	B51	02062	MC2	0.30	\$179.55
08/30/2022	Attend Teams call with M. Conforti, D. Crapo and SEC re: various open issues and next steps.	B51	02062	MC2	1.30	\$778.05
08/30/2022	Attending to e-mails with team re: open issues.	B51	02062	MC2	0.40	\$239.40
08/30/2022	Attend to e-mails with D. Crapo and E. Rosen re: Trendy Properties settlement.	B51	02062	MC2	0.10	\$59.85
08/30/2022	E-mails with D. Crapo re: settlement offers made to six charities.	B51	02062	MC2	0.10	\$59.85
08/30/2022	Review e-mails from T. Ashmore and D. Crapo re: Young account balances.	B51	02062	MC2	0.10	\$59.85
08/30/2022	E-mails to/from listing agent, James Hankins, re: status of 1197 Lloyds Road sale.	B51	02548	DC	0.10	\$59.85
08/31/2022	E-mails with J. Felder re: Wells Fargo production.	B51	02062	MC2	0.10	\$59.85
08/31/2022	E-mails with D. Crapo and M. Conforti re: settlement discussions with net winner.	B51	02062	MC2	0.10	\$59.85
08/31/2022	E-mails to from listing agent, James Hankins, re: 1197 Lloyds Road sales procedures.	B51	02548	DC	0.10	\$59.85
09/07/2022	Confer with other bidder re: offer for 1197 Lloyds Road.	B51	02548	DC	0.20	\$119.70
09/07/2022	Confer with other bidder re: potential offer for 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
09/08/2022	E-mails to/from listing agent re: sale of 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
09/08/2022	E-mails to/from other bidder re: his offer for the 1197 Lloyds Road property and the existing sale contract.	B51	02548	DC	0.20	\$119.70
09/08/2022	Review and respond to e-mails from other bidder re: his offer for 1197 Lloyds Road property.	B51	02548	DC	0.30	\$179.55
09/08/2022	Telephone call to and conference with Brian Wallas of Nicolet Bank re: due diligence on other bidder's financial strength.	B51	02548	DC	0.20	\$119.70
09/08/2022	Review and receipt of Lloyd's published overbid notice (0.1); review and receipt of returned mail from demand letters (1.0); confer and email with team re: same (0.3).	B51	26059	ER	1.40	\$384.30
09/09/2022	E-mails with M. Conforti and net winner representative re: settlement.	B51	02062	MC2	0.10	\$59.85
09/09/2022	E-mail to James Hankins, listing agent, re: sale of 1197 Lloyds Road property.	B51	02548	DC	0.10	\$59.85
09/12/2022	E-mails with D. Crapo and N. Patterson re: revised sale price for 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$59.85
09/12/2022	Prepare for auction of 1197 Lloyds Road Property (0.4); e-mails with D. Crapo, J. Hankins and E. Rosen re: same (0.3); telephone calls with J. Hankins and E. Rosen re: same (0.4).	B51	02062	MC2	1.10	\$658.35
09/12/2022	Conduct auction of 1197 Lloyds Road property; follow-up call and e-mails with E. Rosen re: same.	B51	02062	MC2	0.50	\$299.25
09/12/2022	Draft detailed e-mail summarizing auction results to counsel for the SEC, B. Sewall and M. Young.	B51	02062	MC2	0.30	\$179.55
09/12/2022	E-mails to/from Nancy Patterson, title attorney, re: post-auction procedures re: 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
09/12/2022	Confer with M. Conlan re: 1197 Lloyds Road sale.	B51	02548	DC	0.30	\$179.55
09/12/2022	E-mails to/from M. Conlan and James Hankins, listing agent, re: 1197 Lloyds Road sale.	B51	02548	DC	0.40	\$239.40
09/12/2022	Attend Overbid Auction for Lloyds property [0.5]; detailed email and confer with team re: same [0.1].	B51	26059	ER	0.60	\$164.70
09/13/2022	E-mails with D. Crapo re: Williams auction complaint; confer with D. Crapo re: same.	B51	02062	MC2	0.20	\$119.70
09/13/2022	E-mail from Andra Williams re: overbid session.	B51	02548	DC	0.10	\$59.85

Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
09/13/2022	Confer with M. Conlan re: response to Ms. Williams re: overbid session.	B51	02548	DC	0.30	\$179.55
09/13/2022	Confer with Andra Williams, successful bidder for 1197 Lloyds Road property, re: overbid session.	B51	02548	DC	0.30	\$179.55
09/13/2022	E-mails to/from James Hankins, listing agent, re: overbid session and Andra Williams' comments.	B51	02548	DC	0.30	\$179.55
09/15/2022	E-mails with D. Crapo and E. Rosen re: scheduling closing on 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$59.85
09/15/2022	E-mail to title counsel, Nancy Patterson, re: closing of sale of 1197 Lloyds Road property.	B51	02548	DC	0.10	\$59.85
09/15/2022	E-mail from M. Conlan re: closing of sale of 1197 Lloyds Road property.	B51	02548	DC	0.10	\$59.85
09/15/2022	E-mail listing agent, James Hankins, re: closing of sale of 1197 Lloyds Road property.	B51	02548	DC	0.10	\$59.85
09/15/2022	Detailed email with team re: Lloyds property closing logistics.	B51	26059	ER	0.10	\$27.45
09/16/2022	E-mails to/from M. Conlan re: Andra Williams and closing of 1197 Lloyds Road sale.	B51	02548	DC	0.10	\$59.85
09/16/2022	E-mail to Andra Williams re: closing of 1197 Lloyds Road sale	B51	02548	DC	0.30	\$179.55
09/16/2022	E-mails to/from James Hankins, listing agent, re: 1197 Lloyds Road sale closing.	B51	02548	DC	0.30	\$179.55
09/16/2022	E-mails to/from M. Conlan re: 1197 Lloyds Road sale closing.	B51	02548	DC	0.10	\$59.85
09/19/2022	E-mails to/from James Hankins, listing agent, re: 1197 Lloyds Road sale closing.	B51	02548	DC	0.10	\$59.85
09/21/2022	Review and analyze closing checklist for 1197 Lloyds Road property; e-mails with D. Crapo re: same.	B51	02062	MC2	0.20	\$119.70
09/21/2022	Attend to e-mails with N. Patterson, D. Crapo and E. Rosen re: preparing for closing on 1197 Lloyds Road property, review sale order and confer with D. Crapo re: same.	B51	02062	MC2	0.50	\$299.25
09/21/2022	Review Oak Point sale order and compare it to 1197 Lloyds Road sale order.	B51	02548	DC	0.20	\$119.70
09/21/2022	Review and respond to e-mails from James Hankins, listing agent, re: closing 1197 Lloyds Road sale.	B51	02548	DC	0.10	\$59.85
09/21/2022	E-mails to/from Nancy Patterson, title attorney, re: closing of 1197 Lloyds Road sale.	B51	02548	DC	0.90	\$538.65
09/21/2022	Review and analyze Title Company Underwriter Bulletin and its impact on the 1197 Lloyds Road closing.	B51	02548	DC	0.20	\$119.70
09/21/2022	Confer with M. Conlan re Underwriter Bulletin impact on 1197 Lloyds Road closing, particularly any requirement for a sale confirmation order.	B51	02548	DC	0.20	\$119.70
09/21/2022	E-mails to/from E. Rosen re: closing of 1197 Lloyds Road sale.	B51	02548	DC	0.20	\$119.70
09/21/2022	Email with team re: closing logistics [0.1]; docket closing deadline [0.1].	B51	26059	ER	0.20	\$54.90
09/21/2022	Email with team re: Sale Motion and Order Granting in support of closing.	B51	26059	ER	0.10	\$27.45
09/22/2022	Telephone call with SEC and D. Barney re: disposition of M/V Currencies.	B51	02062	MC2	0.30	\$179.55
09/22/2022	Review and revise Crapo Affidavit in support of sale.	B51	02062	MC2	0.10	\$59.85
09/22/2022	Confer with D. Barney re: disposition of motor vessel Currencies; e-mails with SEC counsel re: same.	B51	02062	MC2	0.20	\$119.70
09/22/2022	E-mails with D. Crapo re: assignment of 1197 Lloyds Road purchase and sale agreement.	B51	02062	MC2	0.10	\$59.85
09/22/2022	Attend to e-mails with D. Crapo, N. Patterson and J. Hankins re: 1197 Lloyds Road closing.	B51	02062	MC2	0.40	\$239.40
09/22/2022	Draft affidavits, review additional documents and information provided by Nancy Patterson, title attorney, in preparation for 1197 Lloyds Road closing.	B51	02548	DC	2.10	\$1,256.85
09/22/2022	E-mails to/from Ms. Patterson re: 1197 Lloyds Road closing.	B51	02548	DC	0.50	\$299.25
09/22/2022	E-mail from James Hankins re: 1197 Lloyds Road closing.	B51	02548	DC	0.10	\$59.85
09/22/2022	Confer with M. Conlan re: 1197 Lloyds Road closing.	B51	02548	DC	0.10	\$59.85
09/22/2022	E-mails to/from M. Conlan re: closing 1197 Lloyds Road sale.	B51	02548	DC	0.10	\$59.85
09/23/2022	Reviewing and signing closing documents for 1197 Lloyds Road Property (2.5); e-mail copies of same to Nancy Patterson (0.1).	B51	02062	MC2	2.60	\$1,556.10
09/23/2022	Attending to e-mails with D. Crapo and N. Patterson re: 1197 Lloyds Road closing.	B51	02062	MC2	0.30	\$179.55
09/23/2022	Review and revise draft deed for 1197 Lloyds Road property (0.2); telephone call with D. Crapo re: review same (0.1).	B51	02062	MC2	0.30	\$179.55
09/23/2022	Telephone calls with N. Patterson and D. Crapo re: 1197 Lloyds Road closing.	B51	02062	MC2	0.20	\$119.70
09/23/2022	Prepare, sign and deliver closing escrow letter Nancy Patterson.	B51	02062	MC2	0.80	\$478.80
09/23/2022	Confer with M. Conlan re: 1197 Lloyds Road closing.	B51	02548	DC	0.30	\$179.55
09/23/2022	Draft, review, revise and finalize affidavits, release, deed to 1197 Lloyds Road property and other closing-related documents in preparation for closing.	B51	02548	DC	2.30	\$1,376.55
09/23/2022	E-mails to/from title attorney, Nancy Patterson, and M. Conlan re: closing issues.	B51	02548	DC	0.70	\$418.95
09/26/2022	Review revised closing statement for 1197 Lloyds Road property (0.1); e-mails with N. Patterson re: same (0.1).	B51	02062	MC2	0.20	\$119.70

Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
09/26/2022	E-mails with D. Crapo re: 1197 Lloyds Road closing.	B51	02062	MC2	0.10	\$59.85
09/26/2022	Confer with M. Conlan re: closing of sale of 1197 Lloyds Road property.	B51	02548	DC	0.10	\$59.85
09/26/2022	Review and respond to e-mails from title attorney, Nancy Patterson, re: closing of sale of 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
09/27/2022	Telephone call with N. Patterson (Closing Attorney's) Office confirming wiring instructions.	B51	02062	MC2	0.10	\$59.85
09/27/2022	E-mails with J. Hankins, N. Patterson and D. Crapo re: exhibits to recorded deed for 1197 Lloyds Road Property.	B51	02062	MC2	0.30	\$179.55
09/27/2022	Review and respond to e-mails from Nancy Patterson re: sale of 1197 Lloyds Road property.	B51	02548	DC	0.20	\$119.70
09/28/2022	Confer with D. Barney re: sale of M/V Currencies.	B51	02062	MC2	0.20	\$119.70
09/28/2022	Attend to e-mails with N. Patterson, D. Crapo and E. Rosen re: 1197 Lloyds Road closing documents.	B51	02062	MC2	0.10	\$59.85
09/28/2022	E-mails to/from title attorney, Nancy Patterson, re: 1197 Lloyds Road closing documents.	B51	02548	DC	0.10	\$59.85
09/28/2022	Review and receipt of Lloyds Closing documentation.	B51	26059	ER	0.10	\$27.45
	Sub-Total For Task:	B51	Sale Motion/363 Sales		60.50	\$33,682.05
07/05/2022	Continue review of information and analysis for preparation of demand letters.	B50	02548	DC	0.50	\$299.25
07/12/2022	Review of and revisions to contract for sale of 1197 Lloyd's Road property.	B50	02548	DC	0.40	\$239.40
07/12/2022	Confer with M. Conlan re: contract for sale of 1197 Lloyd's Road property.	B50	02548	DC	0.20	\$119.70
07/12/2022	Review, revise and finalize template of letter to violators of the Asset Freeze Order.	B50	02548	DC	1.90	\$1,137.15
07/12/2022	E-mail to M. Conlan re: finalize template of letter to violators of the Asset Freeze Order.	B50	02548	DC	0.20	\$119.70
07/13/2022	Review and revise template for demand letters to violators of the Asset Freeze Order per M. Conlan's comments.	B50	02548	DC	0.50	\$299.25
07/13/2022	Respond to M. Conlan's comments concerning demands to violators of the asset freeze order.	B50	02548	DC	0.90	\$538.65
07/13/2022	E-mails to/from M. Conforti re: extension of time to answer in the Mercury Alternative Fund matter.	B50	02548	DC	0.20	\$119.70
07/13/2022	Review and respond to e-mails from Nancy Patterson, title attorney, re: survey.	B50	02548	DC	0.20	\$119.70
07/13/2022	Confer with M. Conlan re: demand letters to violators of Asset Freeze Order.	B50	02548	DC	0.20	\$119.70
07/14/2022	Review proposed order granting sales motion.	B50	02548	DC	0.10	\$59.85
07/14/2022	Review e-mails from E. Rosen and M. Conforti re: procedural issues in broker avoidance action.	B50	02548	DC	0.10	\$59.85
07/14/2022	Confer with M. Conlan re: boat ownership status.	B50	26059	ER	0.10	\$27.45
07/15/2022	E-mails to/from E. Rosen re: procedure in broker avoidance action.	B50	02548	DC	0.10	\$59.85
07/19/2022	E-mails to/from E. Rosen re: sale motion.	B50	02548	DC	0.20	\$119.70
07/19/2022	Confer with M. Conlan re: protective order.	B50	02548	DC	0.10	\$59.85
07/19/2022	Draft demand letters to Asset Freeze Order violators.	B50	02548	DC	4.60	\$2,753.10
07/19/2022	E-mails to M. Conlan re: demand letters to Asset Freeze Order violators.	B50	02548	DC	0.20	\$119.70
07/20/2022	Follow up on Charity demand/tolling letters.	B50	02548	DC	0.20	\$119.70
07/20/2022	Complete demand letters to Asset Freeze Order violators.	B50	02548	DC	1.60	\$957.60
07/20/2022	E-mail to M. Conlan re: demand letters to Asset Freeze Order violators.	B50	02548	DC	0.10	\$59.85
07/20/2022	Review and respond to e-mails from M. Conlan re: Equiti payment and consent to receipt of documents.	B50	02548	DC	0.20	\$119.70
07/20/2022	Confer with Equiti UK counsel, Stephen Senderowitz, re: status of wire transfer.	B50	02548	DC	0.20	\$119.70
07/21/2022	E-mails to/from Y-Man Investment's counsel, Byron Brown, re: answer to Receiver's complaint.	B50	02548	DC	0.30	\$179.55
07/21/2022	E-mails to M. Conlan and to/from M. Conforti re: strategy.					
07/21/2022	E-mails to/from Jessica Magee of Holland & Knight and to M. Conlan re: receivership and Bahamas proceeding.	B50	02548	DC	0.10	\$59.85
07/22/2022	E-mails to/from Y-Man Investment's counsel, Byron Brown, re: answer to Receiver's complaint	B50	02548	DC	0.30	\$179.55
07/22/2022	E-mails to M. Conlan and to/from M. Conforti re: strategy re: Y Man matter.	B50	02548	DC	0.30	\$179.55
07/22/2022	E-mails to/from Jessica Magee of Holland & Knight and to M. Conlan re: receivership and Bahamas proceeding.	B50	02548	DC	0.10	\$59.85
07/22/2022	E-mails to/from Steven Senderowitz, Equity UK's counsel, and M. Conlan re: Equity payment.	B50	02548	DC	0.30	\$179.55
07/25/2022	Review and analyze title commitment.	B50	02548	DC	0.30	\$179.55
07/25/2022	E-mail concerns about title commitment to title counsel, Nancy Patterson.	B50	02548	DC	0.10	\$59.85

Gibbons P.C.

Time Detail

Run Date: 10/27/2022

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
07/25/2022	Review e-mail and attached scheduling motion from Michael and Maria Young's attorney Tracy Ashmore.	B50	02548	DC	0.30	\$179.55
07/25/2022	Review e-mails from M. Conlan, D. Barney and M. Conforti re: demand letters and tolling letters.	B50	02548	DC	0.30	\$179.55
07/25/2022	E-mails to/from Jessica Magee of Holland & Knight, counsel to the Joint Liquidators in the Bahamian proceeding and M. Conlan re: receivership and Bahamas proceeding.	B50	02548	DC	0.20	\$119.70
07/25/2022	E-mails to/from Steven Senderowitz, Equiti UK's counsel, and M. Conlan re: Equiti payment.	B50	02548	DC	0.20	\$119.70
07/25/2022	Confer with Steven Senderowitz, Equiti UK's counsel, and M. Conlan re: Equiti payment.	B50	02548	DC	0.20	\$119.70
07/25/2022	E-mail to M. Conlan re: scheduling order.	B50	02548	DC	0.10	\$59.85
07/26/2022	E-mails to/from to M. Conlan re: proposed scheduling order.	B50	02548	DC	0.10	\$59.85
07/26/2022	Review and respond to e-mails to/from Steven Senderowitz, Equiti UK's counsel re: Equiti payment.	B50	02548	DC	0.30	\$179.55
07/27/2022	Confer with counsel for Equiti, Steven Senderowitz and Christopher Cunningham, re: Equiti's transfer of funds to the Recenver.	B50	02548	DC	0.30	\$179.55
07/27/2022	E-mails to/from M. Conlan re: Equiti wire transfer.	B50	02548	DC	0.20	\$119.70
07/28/2022	Confer with counsel for Equiti, Steven Senderowitz and Christopher Cunningham, re: Equiti's transfer of funds to the Recenver.	B50	02548	DC	0.30	\$179.55
07/28/2022	E-mails to/from M. Conlan re: same.	B50	02548	DC	0.20	\$119.70
07/29/2022	Confer with M.E. Conlan re meeting with Bahamian liquidator.	B50	02548	DC	0.10	\$59.85
07/29/2022	E-mail to counsel for Liquidator in Bahamian proceeding re: meeting.	B50	02548	DC	0.10	\$59.85
07/29/2022	E-mails to/from Ellen Rosen re: demands to Charities.	B50	02548	DC	0.30	\$179.55
07/29/2022	E-mails to/from to John Curtis of RMA re: demands to charities	B50	02548	DC	0.20	\$119.70
07/29/2022	Review information re: demands to Charities.	B50	02548	DC	0.20	\$119.70
07/29/2022	Review charity related data; email with D. Crapo re: same.	B50	26059	ER	0.10	\$27.45
08/01/2022	E-mails to/from M. Conlan and M. Conforti re: response to net winner.	B50	02548	DC	0.20	\$119.70
08/01/2022	E-mails to/from M.B. Counsel and Jessica McGee, counsel for Liquidator in Bahamian proceeding, re: meeting.	B50	02548	DC	0.20	\$119.70
08/02/2022	E-mail to Bahamas proceeding liquidator re: meeting.	B50	02548	DC	0.10	\$59.85
08/02/2022	E-mail from John Curtis of RMA and to E. Rosen re: Charities.	B50	02548	DC	0.10	\$59.85
08/03/2022	Review information re: status of responses to demand letters.	B50	02548	DC	0.30	\$179.55
08/03/2022	E-mail from John Curtis of RMA and to E. Rosen re: charities.	B50	02548	DC	0.20	\$119.70
08/03/2022	Email latest charities list to J. Curtis.	B50	26059	ER	0.10	\$27.45
08/04/2022	E-mails to/from John Curtis of RMA re: claims against Charities.	B50	02548	DC	0.10	\$59.85
08/04/2022	Review and analyze the information forwarded by Mr. Curtis re: charities to determine next steps concerning the charities.	B50	02548	DC	1.70	\$1,017.45
08/04/2022	E-mail to M. Conlan re: recommendations concerning nest steps concerning charities.	B50	02548	DC	0.50	\$299.25
08/04/2022	E-mail to investor advising him that neither the receiver nor his counsel could provide him with tax advice.	B50	02548	DC	0.10	\$59.85
08/04/2022	E-mails to/from counsel for Bahamas liquidation proceeding and M. Conlan re: meeting.	B50	02548	DC	0.10	\$59.85
08/04/2022	Review and respond to e-mail from Jennifer Yakumo of RMA re: payments to Archdiocese of Denver.	B50	02548	DC	0.20	\$119.70
08/04/2022	Review letter from K. Avery of broker Autumn Gold Services re: defense to avoidance action.	B50	02548	DC	0.50	\$299.25
08/04/2022	E-mails to SEC/Broker claim team re: Avery's letter and review e-mail from M. Conlan re: same.	B50	02548	DC	0.20	\$119.70
08/04/2022	Review invoices and proofs of service or non-service of avoidance complaint against brokers.	B50	02548	DC	0.20	\$119.70
08/04/2022	E-mails to/from SEC/Broker claim team re: service on brokers.	B50	02548	DC	0.20	\$119.70
08/04/2022	E-mails to/from E. Rosen re: status of demands on charities.	B50	02548	DC	0.20	\$119.70
08/04/2022	Review e-mail from "" and M. Conforti's response.	B50	02548	DC	0.10	\$59.85
08/04/2022	Email with team and RMA re: charities tolling letters and charity payments data.	B50	26059	ER	0.30	\$82.35
08/05/2022	E-mails to/from Equiti counsel, Steven Senderowitz, and M. Conlan re: Equiti payment.	B50	02548	DC	0.20	\$119.70
08/05/2022	E-mails to/from counsel to liquidator in Bahamas procedure and to M. Conlan re: meeting.	B50	02548	DC	0.20	\$119.70
08/08/2022	Participate in conference call with M. Conlan and representatives of PWC re: potential source of additional recoveries for the receivership estate.	B50	02548	DC	0.40	\$239.40
08/08/2022	Follow up conference call with M. Conlan re: same.	B50	02548	DC	0.20	\$119.70
08/08/2022	E-mail to Equiti's counsel, Steven Senderowitz, re: document production.	B50	02548	DC	0.20	\$119.70

Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
08/08/2022	E-mails to/from M.E. Conlan re: demand letters to asset freeze order violators.	B50	02548	DC	0.20	\$119.70
08/08/2022	Finalize demand letters to asset freeze order violators.	B50	02548	DC	1.20	\$718.20
08/09/2022	Confer with Equiti's counsel, Steven Senderowitz, re: production of documents provided to SEC.	B50	02548	DC	0.20	\$119.70
08/10/2022	Review demand letters from M. Conforti to various defendants.	B50	02062	MC2	0.10	\$59.85
08/10/2022	Telephone call with E. Rosen re: service of avoidance demand letters.	B50	02062	MC2	0.10	\$59.85
08/10/2022	Conference call with T. Ashmore, E. Rosen and J. Curtis re: accounting for Young's Assets.	B50	02062	MC2	0.40	\$239.40
08/10/2022	Review asset analysis from RMA on Young assets.	B50	02062	MC2	0.10	\$59.85
08/10/2022	Confer with E. Rosen re: payments from charities.	B50	02548	DC	0.10	\$59.85
08/10/2022	Review e-mail from E. Rosen re: payments from charities.	B50	02548	DC	0.10	\$59.85
08/10/2022	Confer and email with team and Defendant counsel re: asset collection calculations.	B50	26059	ER	0.40	\$109.80
08/11/2022	Review e-mail and attachments from "" concerning payments.	B50	02548	DC	0.30	\$179.55
08/11/2022	E-mails to/from John Curtis of RMA re: ""s" concerns re: payments.	B50	02548	DC	0.20	\$119.70
08/12/2022	E-mails to/from M. Conlan and E. Rosen re: 1197 Lloyd Road sale motion.	B50	02548	DC	0.10	\$59.85
08/15/2022	E-mails to/from to M. Conlan, M. Conforti and E. Rosen re: same.	B50	02548	DC	0.20	\$119.70
08/16/2022	E-mails to/from charity, Guardian Group re: amount of and backup for Receiver's claim.	B50	02548	DC	0.30	\$179.55
08/16/2022	E-mails to/from Administrator of St. Martin Monastery re: Receiver claim.	B50	02548	DC	0.20	\$119.70
08/16/2022	E-mails to/from Equiti counsel, Steven Senderowitz, re: document production to SEC.	B50	02548	DC	0.20	\$119.70
08/16/2022	Confer with Mr. Senderowitz re: document production to SEC.	B50	02548	DC	0.20	\$119.70
08/17/2022	Review and analyze information included in e-mail from "" D. Pelletier re: defense to receiver's claim.	B50	02548	DC	0.30	\$179.55
08/17/2022	Review available information re: I.T. Black Crude entity and any connection with Mediatrix/Blue Isle	B50	02548	DC	0.30	\$179.55
08/17/2022	E-mails to/from M. Conlan re: Mr. Pelletier's defense and defense asserted by "", Mr. Garcia.	B50	02548	DC	0.20	\$119.70
08/17/2022	E-mails to/from John Curtis of Rocky Mountain Advisory re: I.T. Black Crude entity.	B50	02548	DC	0.30	\$179.55
08/17/2022	E-mails to/from M. Conforti re: I.T. Black Crude entity and Mr. Garcia defense.	B50	02548	DC	0.20	\$119.70
08/17/2022	E-mails to/from D. Barney re: I.T. Black Crude entity and Mr. Garcia defense.	B50	02548	DC	0.10	\$59.85
08/17/2022	Review e-mail from Asim Ali of Buy Investment Properties re: Receiver demand.	B50	02548	DC	0.10	\$59.85
08/17/2022	E-mail to/from M. Conforti and to D. Barney re: Mr. Ali's e-mail.	B50	02548	DC	0.20	\$119.70
08/17/2022	Review and respond to e-mail from Thomas Krysa, counsel for Seldon Young and Jedsco 2 re: Receiver's claim.	B50	02548	DC	0.10	\$59.85
08/17/2022	E-mail to M. Conforti and D. Barney re: Receiver's claim against Seldon Young and Jedsco 2.	B50	02548	DC	0.10	\$59.85
08/18/2022	Review and revise tolling agreement with Buy Investment Properties.	B50	02548	DC	0.30	\$179.55
08/18/2022	E-mails to/from counsel for net winner, D. Barney and M. Conforti, re: meeting.	B50	02548	DC	0.30	\$179.55
08/19/2022	E-mails to/from M. Conlan re: request from Michael Young's counsel, Tracy Ashmore.	B50	02548	DC	0.10	\$59.85
08/19/2022	E-mails to/from J. Curtis re: possible contributions by defendant.	B50	02548	DC	0.30	\$179.55
08/22/2022	E-mails to/from M. Conforti and to E. Rosen re: K8EDW.	B50	02548	DC	0.20	\$119.70
08/23/2022	E-mails to/from Michael Young's counsel, Tracy Ashmore, re: Microsoft Teams Meeting re: Michael Young.	B50	02548	DC	0.20	\$119.70
08/23/2022	Follow up on demand letters to brokers.	B50	02548	DC	0.10	\$59.85
08/24/2022	Review revised tolling agreement with Buy Investment Properties.	B50	02548	DC	0.10	\$59.85
08/24/2022	E-mails to/from M.. Conforti re: revised Buy Investment Properties.	B50	02548	DC	0.10	\$59.85
08/24/2022	Follow up conference with M. Conforti.	B50	02548	DC	0.10	\$59.85
08/24/2022	Confer with Michael Young's counsel, Tracy Ashmore, re: IT Black Crude LLC and contributions by Michael Young.	B50	02548	DC	0.30	\$179.55
08/24/2022	Follow up on demand letters to brokers.	B50	02548	DC	0.10	\$59.85
08/24/2022	Determine and prioritize next steps.	B50	02548	DC	0.30	\$179.55
08/25/2022	E-mails to/from Nancy Patterson, title counsel, re: status of Michael Stewart.	B50	02548	DC	0.10	\$59.85
08/25/2022	Review and respond to e-mail from Michael Young's counsel, Tracy Ashmore, re: Young contributions to Blue Isle and Mediatrix.	B50	02548	DC	0.20	\$119.70
08/25/2022	Review files for information concerning Michael Young-related entities.	B50	02548	DC	0.30	\$179.55

Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
08/25/2022	E-mail to John Curtis re: contributions by Michael Young to Mediatrix and Blue Isle.	B50	02548	DC	0.20	\$119.70
08/25/2022	E-mail to M. Conlan re: status of collections from charities.	B50	02548	DC	0.50	\$299.25
08/26/2022	Review e-mail from “.”	B50	02548	DC	0.10	\$59.85
08/26/2022	Confer with Karibu Sana re: donations by Michael Young.	B50	02548	DC	0.60	\$359.10
08/26/2022	Analyze information provided by Ms. Little.	B50	02548	DC	0.20	\$119.70
08/29/2022	Review and analyze information related to charities to determine next steps.	B50	02548	DC	0.70	\$418.95
08/29/2022	E-mail analysis re: charities to M. Conlan.	B50	02548	DC	1.20	\$718.20
08/30/2022	E-mails to/from Nancy Patterson, title counsel, re: status of Michael Stewart.	B50	02548	DC	0.10	\$59.85
08/30/2022	Review and respond to e-mail from Michael Young’s counsel, Tracy Ashmore, re: Young contributions to Blue Isle and Mediatrix.	B50	02548	DC	0.20	\$119.70
08/30/2022	Review files for information concerning Michael Young-related entities.	B50	02548	DC	0.30	\$179.55
08/30/2022	E-mail to John Curtis re: contributions by Michael Young to Mediatrix and Blue Isle.	B50	02548	DC	0.20	\$119.70
08/30/2022	E-mail to M. Conlan re: status of collections from charities.	B50	02548	DC	0.50	\$299.25
08/30/2022	Review and receipt of latest demand letters to charities [0.3]; update charities spreadsheet re: same [0.4]; review and receipt of returned mail letters [0.4].	B50	26059	ER	1.10	\$301.95
08/31/2022	Review, revise and complete avoidance complaint against charities.	B50	02548	DC	1.60	\$957.60
08/31/2022	E-mail to M. Conlan re: avoidance complaint against charities.	B50	02548	DC	0.10	\$59.85
08/31/2022	E-mail to Steven Senderowitz, counsel for Equiti, re: production of documents previously produced to SEC.	B50	02548	DC	0.20	\$119.70
08/31/2022	E-mails to/from M. Conlan and M. Conforti re: document subpoena on Equiti.	B50	02548	DC	0.10	\$59.85
08/31/2022	Review document subpoena on Equiti.	B50	02548	DC	0.10	\$59.85
08/31/2022	Prepare complaint against charities for filing.	B50	02548	DC	0.50	\$299.25
08/31/2022	Confer with Equiti counsel, Steven Senderowitz, re: subpoena.	B50	02548	DC	0.10	\$59.85
08/31/2022	Confer with M. Conlan re: subpoena on Equiti.	B50	02548	DC	0.10	\$59.85
08/31/2022	Review e-mail from Robert Diehl, counsel to SMP, re: his discussions with Allison Masse of BRiley and Bolta’s restructuring counsel, Douglas Lieberman.	B50	02548	DC	0.10	\$59.85
08/31/2022	Review e-mails (including attachments) between M. Conforti and broker commission defendant re: claims against her.	B50	02548	DC	0.20	\$119.70
08/31/2022	E-mails to/from counsel for the Mercury group, Bryan Harrison and to Neal Mitchell re: procedural issues.	B50	02548	DC	0.10	\$59.85
08/31/2022	Begin review of financial information provided by net winner.	B50	02548	DC	0.30	\$179.55
08/31/2022	E-mail to M. Conforti re: information from broker defendant.	B50	02548	DC	0.10	\$59.85
08/31/2022	E-mails to/from M. Conlan and M. Conforti re: claim against net winner.	B50	02548	DC	0.20	\$119.70
09/01/2022	Review and receipt of returned demand letter documentation (0.1); docket extended charity entity tolling deadline (0.1); update charity chart re same (0.1).	B50	26059	ER	0.30	\$82.35
09/02/2022	Review and analyze information re: Michael Young’s assets and contributions to Mediatrix.	B50	02548	DC	0.20	\$119.70
09/02/2022	E-mails to/from John Curtis of RMA re: same.	B50	02548	DC	0.20	\$119.70
09/04/2022	E-mails with D. Crapo and J. Curtis re: deposits into Island Technology accounts.	B50	02062	MC2	0.10	\$59.85
09/07/2022	E-mail to listing agent, James Hankins, re: other bidder offer.	B50	02548	DC	0.10	\$59.85
09/07/2022	Review sale approval order to ensure overbids comply.	B50	02548	DC	0.20	\$119.70
09/07/2022	Review and respond to e-mail from other bidder re: his offer.	B50	02548	DC	0.20	\$119.70
09/07/2022	E-mail to Mr. Hankins re: Darrin McCurdy offer.	B50	02548	DC	0.10	\$59.85
09/08/2022	Attend to e-mails with Hayley Sanders at FX Strategy Master Fund, D. Crapo and E. Rosen re: creditor list.	B50	02062	MC2	0.10	\$59.85
09/08/2022	Telephone call to and conference with Landry Scott of Liberty Bank re: due diligence on other bidder’s financial strength.	B50	02548	DC	0.20	\$119.70
09/09/2022	Confer with overbidder’s realtor, Darrin McCurdy. re: overbid session.	B50	02548	DC	0.20	\$119.70
09/09/2022	Review and receipt of returned mail from demand letters (0.4); review, receipt and organize recent settlement documentation (0.1); update chart re: same (0.8); preliminary research re: same (0.3); email and confer with team re: same (0.3).	B50	26059	ER	1.90	\$521.55
09/12/2022	Review amendment to sale contract.	B50	02548	DC	0.10	\$59.85
09/13/2022	Draft and transmit to M. Conlan analysis of overbid session.	B50	02548	DC	1.40	\$837.90
09/16/2022	Follow up telephone conference with M. Conforti.	B50	02548	DC	0.10	\$59.85

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Gibbons P.C.Time Detail
Run Date: 10/27/2022

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
09/19/2022	E-mails to/from M. Conlan and Michael and Maria Young's counsel, Tracy Ashmore, re: latest filing by Michael and Victoria Young.	B50	02548	DC	0.10	\$59.85
09/19/2022	Begin review of latest filing by Michael and Maria Young.	B50	02548	DC	0.20	\$119.70
09/19/2022	Review e-mail from Steven Senderowitz, Equiti's counsel, document production.	B50	02548	DC	0.10	\$59.85
09/20/2022	Confer with M.E. Conlan re: latest filing by Michael and Victoria Stewart.	B50	02548	DC	0.10	\$59.85
09/20/2022	Continue reviewing latest filing by Michael and Victoria Stewart.	B50	02548	DC	0.60	\$359.10
09/21/2022	E-mails to/from M. Conforti re: same.	B50	02548	DC	0.10	\$59.85
09/23/2022	E-mail to N. Mitchell re: Mercury proceeding.	B50	02548	DC	0.10	\$59.85
09/26/2022	Unsuccessful telephone call to Mr. Smith.	B50	02548	DC	0.20	\$119.70
09/26/2022	Review and respond to e-mails from M. Conforti and Jedsco counsel re: resolution of Receiver's claim against Jedsco.	B50	02548	DC	0.10	\$59.85
09/27/2022	Review receivership order for authority to repair M/V Currencies (0.1); e-mails with D. Barney re: same (0.1).	B50	02062	MC2	0.20	\$119.70
09/28/2022	E-mails to/from M. Conforti re: claims against Mr. Pelletiere.	B50	02548	DC	0.20	\$119.70
09/28/2022	Confer with M. Conlan re: claims against charities.	B50	02548	DC	0.10	\$59.85
09/28/2022	Prepare outline of status of claims against charities for M.B Conlan.	B50	02548	DC	0.20	\$119.70
09/28/2022	E-mail to MBC re: charities.	B50	02548	DC	0.10	\$59.85
09/28/2022	Review e-mail from net winner.	B50	02548	DC	0.10	\$59.85
09/28/2022	Review e-mails from Michael and Maria Young's counsel, Tracy Ashmore, re: claims against charities.	B50	02548	DC	0.20	\$119.70
09/29/2022	E-mails to/from Steven Senderowitz, Equiti's counsel, re document production.	B50	02548	DC	0.20	\$119.70
09/29/2022	Confer with M. Conlan re: claims against charities.	B50	02548	DC	0.10	\$59.85
09/29/2022	Participate in conference call with M. Conlan, Young counsel, Tracy Ashmore; and SEC re: claims against charities.	B50	02548	DC	0.50	\$299.25
09/30/2022	Consider issues re: response to a potential motion by Michael and Maria Young re: collections from charities.	B50	02548	DC	0.50	\$299.25
09/30/2022	E-mails to/from M. Conlan re: suits against charities.	B50	02548	DC	0.20	\$119.70
09/30/2022	E-mails to/from Guardian Group re: information concerning Receiver's claim.	B50	02548	DC	0.10	\$59.85
09/30/2022	Review information provided by Mr. Eager.	B50	02548	DC	0.50	\$299.25
Sub-Total For Task:		B50	Asset Analysis and Recovery		54.80	\$31,404.60
Total For Matter:		106202	Counsel to Mark Conlan in his capacity a		319.40	\$153,668.05
Totals For Client:					319.40	\$153,668.05

Gibbons P.C.

Time Summary
Run Date: 10/27/2022

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	20.30	\$598.50	\$12,149.55
02062	MC2	Conlan, Mark	Director	41.70	\$598.50	\$24,957.45
02548	DC	Crapo, David	Counsel	132.50	\$598.50	\$79,301.25
30541	MAC	Conforti, Michael A.	Associate	58.30	\$328.50	\$19,151.55
26059	ER	Rosen, Ellen	Case Manager	57.50	\$274.50	\$15,783.75
26048	NM3	Mitchell, Neal	ParaLegal	1.50	\$207.00	\$310.50
40027	RT1	Traylor, Robin	Others	7.60	\$265.00	\$2,014.00
Totals:				319.40		\$153,668.05

Gibbons P.C.

Fee Application
Run Date: 10/27/2022

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

Task/ Code	Description Of Services	Hours	Value
RE05	Status Reports	8.40	\$2,889.00
B62	Litigation	179.50	\$79,981.90
B58	Fee Applications	10.90	\$3,542.85
B54	Claims Administration and Objections	0.50	\$299.25
B53	Case Administration	1.30	\$778.05
B52	Business Operations	3.50	\$1,090.35
B51	Sale Motion/363 Sales	60.50	\$33,682.05
B50	Asset Analysis and Recovery	54.80	\$31,404.60
Totals:		319.40	\$153,668.05

Gibbons P.C.

Fee Application

Run Date: 10/27/2022

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

Task Code	Description Of Services	Hours	Value
RE05	<u>Status Reports</u>		
	02062 Conlan, Mark	0.50	\$299.25
	02548 Crapo, David	1.30	\$778.05
	26059 Rosen, Ellen	6.60	\$1,811.70
RE05	Status Reports	8.40	\$2,889.00
B62	<u>Litigation</u>		
	02518 Barney, Dale E.	20.30	\$12,149.55
	30541 Conforti, Michael A.	58.30	\$19,151.55
	02062 Conlan, Mark	17.50	\$10,473.75
	02548 Crapo, David	47.80	\$28,608.30
	26048 Mitchell, Neal	1.50	\$310.50
	26059 Rosen, Ellen	26.50	\$7,274.25
	40027 Traylor, Robin	7.60	\$2,014.00
B62	Litigation	179.50	\$79,981.90
B58	<u>Fee Applications</u>		
	02062 Conlan, Mark	1.40	\$837.90
	02548 Crapo, David	0.30	\$179.55
	26059 Rosen, Ellen	9.20	\$2,525.40
B58	Fee Applications	10.90	\$3,542.85
B54	<u>Claims Administration and Objections</u>		
	02062 Conlan, Mark	0.40	\$239.40
	02548 Crapo, David	0.10	\$59.85
B54	Claims Administration and Objections	0.50	\$299.25
B53	<u>Case Administration</u>		
	02062 Conlan, Mark	1.30	\$778.05
B53	Case Administration	1.30	\$778.05
B52	<u>Business Operations</u>		
	02062 Conlan, Mark	0.20	\$119.70
	02548 Crapo, David	0.20	\$119.70
	26059 Rosen, Ellen	3.10	\$850.95
B52	Business Operations	3.50	\$1,090.35
B51	<u>Sale Motion/363 Sales</u>		
	02062 Conlan, Mark	19.30	\$11,551.05
	02548 Crapo, David	33.40	\$19,989.90
	26059 Rosen, Ellen	7.80	\$2,141.10
B51	Sale Motion/363 Sales	60.50	\$33,682.05
B50	<u>Asset Analysis and Recovery</u>		
	02062 Conlan, Mark	1.10	\$658.35
	02548 Crapo, David	49.40	\$29,565.90
	26059 Rosen, Ellen	4.30	\$1,180.35
B50	Asset Analysis and Recovery	54.80	\$31,404.60
Totals:		319.40	\$153,668.05

Gibbons P.C.

Disbursement Detail

Run Date: 10/27/2022

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

Tran Date	Description Of Disbursement	Value
<u>Disbursement Type:</u> <u>Expedited Delivery Service (Federal Express)</u>		
08/03/2022	Expedited Delivery Service (Federal Express)	\$84.98
08/03/2022	Expedited Delivery Service (Federal Express)	\$117.00
08/03/2022	Expedited Delivery Service (Federal Express)	\$108.28
08/03/2022	Expedited Delivery Service (Federal Express)	\$100.23
08/03/2022	Expedited Delivery Service (Federal Express)	\$91.51
08/10/2022	Expedited Delivery Service (Federal Express)	\$108.50
08/10/2022	Expedited Delivery Service (Federal Express)	\$36.75
08/10/2022	Expedited Delivery Service (Federal Express)	\$36.75
08/12/2022	Expedited Delivery Service (Federal Express)	\$35.73
08/12/2022	Expedited Delivery Service (Federal Express)	\$73.61
08/12/2022	Expedited Delivery Service (Federal Express)	\$76.53
08/12/2022	Expedited Delivery Service (Federal Express)	\$69.72
08/12/2022	Expedited Delivery Service (Federal Express)	\$69.72
08/12/2022	Expedited Delivery Service (Federal Express)	\$73.61
08/15/2022	Expedited Delivery Service (Federal Express)	\$58.86
08/15/2022	Expedited Delivery Service (Federal Express)	\$74.21
08/15/2022	Expedited Delivery Service (Federal Express)	\$74.21
08/15/2022	Expedited Delivery Service (Federal Express)	\$74.21
08/15/2022	Expedited Delivery Service (Federal Express)	\$89.53
08/26/2022	Expedited Delivery Service (Federal Express)	\$51.18
09/13/2022	Expedited Delivery Service (Federal Express)	\$39.61
	Total: Expedited Delivery Service (Federal Express)	\$1,544.73

Disbursement Type: Filing and Miscellaneous Fees

06/28/2022	Filing and Miscellaneous Fees	\$9.48
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Gibbons P.C.

Disbursement Detail

Run Date: 10/27/2022

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

Tran Date	Description Of Disbursement	Value
06/28/2022	Filing and Miscellaneous Fees	\$27.03
06/30/2022	Filing and Miscellaneous Fees	\$9.48
06/30/2022	Filing and Miscellaneous Fees	\$27.03
07/08/2022	Filing and Miscellaneous Fees	\$7.21
07/08/2022	Filing and Miscellaneous Fees	\$43.93
07/08/2022	Filing and Miscellaneous Fees	\$18.16
07/27/2022	Filing and Miscellaneous Fees	\$9.48
07/27/2022	Filing and Miscellaneous Fees	\$57.56
07/27/2022	Filing and Miscellaneous Fees	\$27.03
07/27/2022	Filing and Miscellaneous Fees	\$9.08
07/28/2022	Filing and Miscellaneous Fees	\$3.98
07/28/2022	Filing and Miscellaneous Fees	\$9.48
07/22/2022	Filing and Miscellaneous Fees	\$9.48
	Total: Filing and Miscellaneous Fees	\$268.41

Disbursement Type: Legal Research - Lexis

06/08/2022	Legal Research - Lexis	\$56.24
	Total: Legal Research - Lexis	\$56.24

Disbursement Type: Legal Research - PACER

06/14/2022	Legal Research - PACER	\$0.10
06/14/2022	Legal Research - PACER	\$0.10
06/15/2022	Legal Research - PACER	\$3.00
06/06/2022	Legal Research - PACER	\$0.10
06/06/2022	Legal Research - PACER	\$0.20
07/13/2022	Legal Research - PACER	\$3.00
07/13/2022	Legal Research - PACER	\$0.60
07/13/2022	Legal Research - PACER	\$0.20
07/13/2022	Legal Research - PACER	\$1.80
07/19/2022	Legal Research - PACER	\$3.00
07/05/2022	Legal Research - PACER	\$0.30
07/05/2022	Legal Research - PACER	\$0.10
07/05/2022	Legal Research - PACER	\$0.10
07/05/2022	Legal Research - PACER	\$0.10
07/05/2022	Legal Research - PACER	\$0.10
07/05/2022	Legal Research - PACER	\$0.80
07/05/2022	Legal Research - PACER	\$0.60
07/05/2022	Legal Research - PACER	\$0.70
07/05/2022	Legal Research - PACER	\$0.60
07/07/2022	Legal Research - PACER	\$0.10
07/07/2022	Legal Research - PACER	\$0.10
	Total: Legal Research - PACER	\$15.70

Disbursement Type: Legal Research - Westlaw

Gibbons P.C.

Disbursement Detail

Run Date: 10/27/2022

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

Tran Date	Description Of Disbursement	Value
05/04/2022	Legal Research - Westlaw	\$0.90
05/04/2022	Legal Research - Westlaw	\$1.10
05/17/2022	Legal Research - Westlaw	\$0.10
05/17/2022	Legal Research - Westlaw	\$0.10
05/17/2022	Legal Research - Westlaw	\$0.10
05/17/2022	Legal Research - Westlaw	\$0.30
05/17/2022	Legal Research - Westlaw	\$0.50
05/17/2022	Legal Research - Westlaw	\$1.80
05/17/2022	Legal Research - Westlaw	\$0.10
05/17/2022	Legal Research - Westlaw	\$0.10
05/17/2022	Legal Research - Westlaw	\$0.10
07/27/2022	Legal Research - Westlaw	\$40.00
07/08/2022	Legal Research - Westlaw	\$30.00
07/28/2022	Legal Research - Westlaw	\$10.00
07/11/2022	Legal Research - Westlaw	\$10.00
	Total: Legal Research - Westlaw	\$95.20

Total Disbursements:	\$1,980.28
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

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

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD, *et al.*,

Relief Defendants.

**ORDER APPROVING AND AUTHORIZING PAYMENT OF
RECEIVER'S AND PROFESSIONALS' FEES AND COSTS
FROM JULY 1, 2022 THROUGH SEPTEMBER 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 July 1, 2022 through September 30, 2022* [ECF No.] (the "Fourth Quarterly Fee Application"). The Court having reviewed and considered the Fourth Quarterly Fee Application and all pleadings and evidence filed in support thereof, and there being no opposition to the Fourth Quarterly Fee Application, and good cause appearing therefore, IT IS

ORDERED that:

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

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

- a. The Receiver's fees in the amount of \$2,870.00; and
- b. The Receiver's counsel, Gibbons P.C.'s fees of \$153,668.05 plus costs of \$1,980.28 for a total of \$155,648.33; and
- c. The Receiver's accountants, Rocky Mountain Advisory, LLC's, fees of \$18,567.00 and RMA's costs of \$226.92 for a total of \$18,793.92; and
- d. The Original Receiver firm, Robb Evans and Associates, LLC's, fees totaling \$126.90; and
- e. The Original Receiver's counsel at Barnes & Thornburg LLP's, fees of \$239.20.

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 Fourth Quarterly Fee Application.