

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

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

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD, *et al.*,

Relief Defendants.

**MOTION FOR ORDER APPROVING AND AUTHORIZING PAYMENT OF
RECEIVER'S AND PROFESSIONALS' FEES AND COSTS
FROM OCTOBER 1, 2022 THROUGH DECEMBER 31, 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 October 1, 2022 through the end of the quarter, December 31, 2022 (the "**Fifth 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 \$1,505.00 plus Receiver's costs of \$59.04 for a total of \$1,564.04 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 \$122,927.55 and Gibbons' costs of \$2,526.10 for a total of \$125,453.65 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 \$5,996.00 and RMA's costs of \$54.43 for a total of \$6,050.43 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 counsel at Barnes & Thornburg LLP's, (“**Barnes & Thornburg**”) fees of \$478.40 for transition services described in detail below as well as on Barnes & Thornburg's invoice attached as Exhibit C to the Conlan Declaration.

INTRODUCTION

This is the fifth Quarterly Fee Application pursuant to the Receiver Order, and covers the Fifth Expense Period, from October 1, 2022 through December 31, 2022. The Motion is based on the memorandum of points and authorities below, the Conlan and Crapo Declarations, upon the pleadings, records and files of the Court in this case of which the Receiver requests the Court to take judicial notice, including without limitation the *Report of Receiver's Activities from October*

1, 2022 through December 31, 2022 [ECF No. 396] (the “**Receiver’s Fifth 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.

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 counsel for 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 the Quarterly Fee Application. To date, we have not received a response from counsel for the Sewalls and their related entities.

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

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. [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; Status Reports; Fee Application; Employment Applications; Business Operations; Claims; Sale Motion; Tax Issues and Case Administration

During this period the Receiver and Gibbons personnel communicated with personnel from the offices of the Plaintiff, offices of counsel for certain Defendants, pro se Defendants, offices of counsel to the Original Receiver,² as well as insurance brokers regarding insurance coverage, and attended to avoidance claims, real property assets, personal property assets, and other assets. The Receiver has also responded to investor inquiries during the period.

The Receiver prepared and filed the Receiver’s Fifth Report and *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. 386], both of which were approved.

As of the fourth Quarter of 2022, Receiver’s counsel has: negotiated, settled and/or received funds in connection with 13 Net Winners; is still negotiating with one Net Winner; has one more Net Winner for whom the firm drafted a complaint that was later filed by local counsel in Washington State court; has received no response from five Net Winners (three of whom are foreign and two of whom have cannot be located); and determined that the remaining three Net Winners are no longer worth pursuing (including one under criminal indictment and whose assets

² The original Receiver Order appointed Brick Kane of Robb Evans & Associates LLC as Receiver (the “**Original Receiver**”).

are frozen, one in bankruptcy, and one subsequently found to be a net loser). *See Exhibit A* for detail.

Receiver's counsel also communicated with certain broker defendants to explore settlement. This process also included review and analysis of related documents, including numerous documents produced by the broker defendants. In the interest of avoiding the costs of litigation, the Receiver's counsel had previously 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. The Receiver has so far received a total of \$645,574.14 in settlement payments of which \$110,306.45 was received during the Fifth Expense Period.

The Receiver's counsel also followed up on demand letters to certain asset violators and with tolling agreements with certain charitable entities. The Receiver is still in communication or negotiations with several charitable entities to recover certain donations they received from Defendant Michael Young. During the Q4 2022 Period, the Receiver collected an additional \$7,500 from a charity and initiated and continued negotiations with two (2) other charities.

On December 20, 2022, Receiver's counsel filed an Unopposed Motion to Retain a Seattle law firm as Local Counsel [ECF No. 391] (the "**Unopposed Local Counsel Motion**") to pursue an avoidance action against a Net Winner in Washington State Court. The Unopposed Local Counsel Motion was granted on January 11, 2023 [ECF No. 392]. The Unopposed Local Counsel Motion followed the Net Winner's failure for three months to respond to any communications from the Receiver concerning resolution of the Receiver's claim. After the Court granted the

Unopposed Local Counsel Motion, the Net Winner contacted the Receiver's counsel in an attempt to reopen settlement discussions.

During the previous period, the Receiver attempted to follow up with Michael Stewart regarding the titles of seven vehicles and regarding an additional nine motor vehicle titles. During the Fifth Expense Period, Mr. Stewart continued to remain non-responsive to the Receiver's attempts to reach out (via email and phone) to meet and confer regarding 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**"), followed the next day by a text order appointing counsel for Mr. Stewart [ECF 375]. The Contempt Order was stayed until November 1, 2022 [ECF No. 380].

Following months of negotiations, on October 17, 2022, the Receiver received more than 43,000 pages of documents from Equiti UK, Ltd., the Defendants' former prime broker, concerning its relationship and transactions with the Defendants. The Receiver's counsel reviewed the bulk of those documents in the Fifth Expense Period to assist in determining whether the Receiver has any claims against the prime broker, and/or its affiliates.

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.

Further, the Receiver continues to identify and analyze data as well as perform legal research in support of other potential avoidance actions, potential actions regarding certain vehicles and a 39' motor vessel, the "M/V Currenseas," and other personal property. The Receiver and his counsel have engaged in communications regarding measures to safeguard assets, including coordinating repairs and obtaining insurance for such personal property.

On October 31, 2022 both Plaintiff's counsel and Receiver's counsel filed opposition briefs [ECF No. 382; 383] to the Young's Renewed Motion to Terminate Receiver's Collection Actions Against Religious Charities [ECF No. 367], which remains pending.

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 other personal property. The Receiver and his counsel have also communicated with interested parties, as well as parties currently holding the "M/V Currenseas" in connection with its repair and eventual sale.

SUMMARY OF SERVICES BY OTHER RECEIVER PROFESSIONALS

Rocky Mountain Advisory Services

The majority of RMA's services provided during the Fifth Expense Period were related to Receivership operations and included but are not limited to the following: preparation of Quarterly Report for the 3rd Quarter of 2022; communications with the Receiver and his counsel at Gibbons; accounting services such as receipt of funds and preparation of payments to vendors and professionals; 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

The Receiver and his counsel communicated with counsel for the Original Receiver. The majority of communications in the Fifth Expense Period concerned transfer of recently received Receivership assets; an invoice regarding certain real property; and an investor inquiry. For additional detail, please see time entries on Exhibit C 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 Fifth Expense Period, the Receiver and his professionals rendered reasonable, necessary and valuable services for the Receivership Estate that were beneficial to the Receivership Estate and the parties in interest. As demonstrated herein, including the supporting declarations and exhibits, the Receiver and his professionals have performed substantial and wide-ranging tasks that were beneficial to the Receivership Estate, including directly bringing funds into the Receivership Estate so that these funds could not be diverted, misused or concealed, as well as taking possession and control of parcels of real property and laying the groundwork for the subsequent sale of that property for the benefit of the Receivership Estate. *See Federal Trade Comm'n v. Capital Acquisitions & Mgmt. Corp.*, 2005 U.S. Dist. LEXIS 18504 (N.D. Ill. August 26, 2005). The Receiver submits the fees are reasonable in light of the services rendered, and the fees and costs requested should be awarded in their entirety.

The Receiver has sufficient funds on hand to pay the fees and costs incurred through December 31, 2022 and requested in the Motion. Based on the cash on hand reported in the

Receiver's Fifth Report, the Receivership Estate was holding \$23,922,773.89 net of accrued and unpaid fees and costs totaling \$132,639.04.

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: February 21, 2023

GIBBONS P.C.

By: /s/ David N. Crapo
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Counsel to Mark B. Conlan, as Receiver

CERTIFICATE OF SERVICE

I hereby certify that on February 21, 2023, I caused the foregoing to be electronically filed by means of the CM/ECF system which will send notification of such filing to parties or counsel registered with CM/ECF.

Further on the same date, I certify that I have caused the foregoing to be emailed to the parties as indicated on the attached service list.

Further on the same date, I certify that I have caused a copy of the foregoing to be mailed to the following non-CM/ECF participant: Aaron Stewart, 23800 North 73rd Place, Scottsdale, AZ 85255.

/s/ David N. Crapo

SERVICE LIST

VIA CM/ECF and EMAIL

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

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Relief Defendant

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Scottsdale, AZ 85255

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

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

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD, *et al.*,

Relief Defendants.

**DECLARATION OF MARK B. CONLAN, ESQ., RECEIVER, IN SUPPORT OF THE
MOTION FOR ORDER APPROVING AND AUTHORIZING PAYMENT OF
RECEIVER'S AND PROFESSIONALS' FEES AND COSTS
FROM OCTOBER 1, 2022 THROUGH DECEMBER 31, 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 October 1, 2022 through December 30, 2022* (the "**Fifth 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 Fifth 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 \$1,505.00 in and Receiver's costs of \$59.04 for a total of \$1,564.04 for the Fifth 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 \$5,996.00 and RMA's costs of \$54.43 for a total of \$6,050.43 for the Fifth Expense Period.

7. Attached hereto as Exhibit C is a true and correct copy of Original Receiver's counsel, Barnes & Thornburg LLP's, ("**Barnes & Thornburg**") invoice for Barnes & Thornburg's fees of \$478.40 for the Fifth Expense Period.

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

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

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

10. 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 February 21, 2023 at Newark, New Jersey.

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

EXHIBIT A

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
10/18/2022	Review and sign California, Colorado and Federal 2021 tax returns (0.4); confer with J. Gifford at RMA re: same (0.3).	B70	02062	MC2	0.70	\$245.00
11/01/2022	Review and sign request for prompt tax determination to IRS.	B70	02062	MC2	0.20	\$70.00
11/21/2022	Attend to e-mails with T. Ashmore and R. Ereksen re: Florida tax bill.	B70	02062	MC2	0.10	\$35.00
	Sub-Total For Task:	B70			1.00	\$350.00
10/05/2022	Review Q2 fee order; e-mails with R. Ereksen re: payment of approved fees.	B58	02062	MC2	0.20	\$70.00
	Sub-Total For Task:	B58			0.20	\$70.00
10/05/2022	E-mails with R. Ereksen and J. Curtis re: payment of Q2 professional fees.	B52	02062	MC2	0.10	\$35.00
10/07/2022	Review and sign wire authorization for repairs of M/V Currencies.	B52	02062	MC2	0.10	\$35.00
10/07/2022	Telephone calls with Santiago at EastWest Bank and D. Barney re: wire instructions for Compass Marine.	B52	02062	MC2	0.30	\$105.00
10/12/2022	Telephone call with D. Barney and Santiago at EastWest Bank confirming wiring instructions for Compass Marine.	B52	02062	MC2	0.10	\$35.00
10/13/2022	Telephone call with EastWest Bank (Stephanie) confirming outbound wire to Compass Marine; e-mails with D. Barney and J. Cunningham re: same.	B52	02062	MC2	0.10	\$35.00
10/24/2022	Attending to checks received from Wells Fargo and broker defendant.	B52	02062	MC2	0.10	\$35.00
11/02/2022	E-mails with G. Caris re: Co-Serv invoice on 1197 Lloyds Road (0.1); telephone call with E. Rosen re: same (0.1).	B52	02062	MC2	0.20	\$70.00
11/03/2022	E-mails with D. Crapo and R. Ereksen re: ordering check service for service of summons and complaint on Alt. Asset Management and K8EDW.	B52	02062	MC2	0.10	\$35.00
11/04/2022	E-mails with K. Schauer re: insurance for M/V Currenseas and two BMWs in Nassau.	B52	02062	MC2	0.10	\$35.00
11/04/2022	Review invoice from Bayshore Marina for M/V Currenseas storage charges; e-mails with D. Barney and R. Ereksen re: same.	B52	02062	MC2	0.10	\$35.00
11/04/2022	Draft detailed e-mail to K. Schauer re: insurance for M.V. Currenseas.	B52	02062	MC2	0.30	\$105.00
11/04/2022	Fact research and e-mails with J. Deckenbach re: insurance for BMWs and M/V Currenseas.	B52	02062	MC2	0.20	\$70.00
11/07/2022	Review October EastWest Bank Statement.	B52	02062	MC2	0.10	\$35.00
11/28/2022	Review and approve for payment invoices for Port Charlotte taxes and CoServ.	B52	02062	MC2	0.10	\$35.00
12/06/2022	E-mails with E. Rosen re: boat insurance.	B52	02062	MC2	0.10	\$35.00
12/06/2022	Attend to e-mails with R. Ereksen re: approval of professionals' Q3 2022 fee payments.	B52	02062	MC2	0.10	\$35.00
12/07/2022	Attend to e-mails with J. Deckenbach re: insurance for motor vehicles.	B52	02062	MC2	0.10	\$35.00
12/16/2022	Review Check Hold Notice from EastWest Bank.	B52	02062	MC2	0.10	\$35.00
12/16/2022	E-mails with G. Caris, E. Rosen and M. Conforti re: investor inquiry.	B52	02062	MC2	0.10	\$35.00
	Sub-Total For Task:	B52			2.50	\$875.00
10/04/2022	Attend to e-mails with D. Crapo re: expenses for Dallas Morning News advertisements for 1197 Lloyds Road overbid session.	B51	02062	MC2	0.20	\$70.00
11/22/2022	Attending to CoServ invoice; forward same to N. Patterson and James Hankins for payment by buyer of 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$35.00
11/23/2022	Attend to e-mails re: balance due CoServ on 1197 Lloyds Road property.	B51	02062	MC2	0.10	\$35.00
	Sub-Total For Task:	B51			0.40	\$140.00
10/06/2022	Confer with D. Barney re: payment of Compass Marine invoice for repair of M/V Currencies (0.1); attend to e-mails with R. Ereksen, J. Curtis and D. Barney re: same (0.1).	B50	02062	MC2	0.20	\$70.00
	Sub-Total For Task:	B50			0.20	\$70.00
Total For Matter:					4.30	\$1,505.00
Totals For Client:					4.30	\$1,505.00

Gibbons P.C.

Time Summary
Run Date: 2/2/2023

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	4.30	\$350.00	\$1,505.00
Totals:				4.30		\$1,505.00

Gibbons P.C.

Fee Application
Run Date: 2/2/2023

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
B70	Tax Issues	1.00	\$350.00
B58	Fee Applications	0.20	\$70.00
B52	Business Operations	2.50	\$875.00
B51	Sale Motion/363 Sales	0.40	\$140.00
B50	Asset Analysis and Recovery	0.20	\$70.00
Totals:		4.30	\$1,505.00

Gibbons P.C.Fee Application
Run Date: 2/2/2023

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
<u>B70</u>	<u>Tax Issues</u>		
	02062 Conlan, Mark	1.00	\$350.00
B70	Tax Issues	1.00	\$350.00
<u>B58</u>	<u>Fee Applications</u>		
	02062 Conlan, Mark	0.20	\$70.00
B58	Fee Applications	0.20	\$70.00
<u>B52</u>	<u>Business Operations</u>		
	02062 Conlan, Mark	2.50	\$875.00
B52	Business Operations	2.50	\$875.00
<u>B51</u>	<u>Sale Motion/363 Sales</u>		
	02062 Conlan, Mark	0.40	\$140.00
B51	Sale Motion/363 Sales	0.40	\$140.00
<u>B50</u>	<u>Asset Analysis and Recovery</u>		
	02062 Conlan, Mark	0.20	\$70.00
B50	Asset Analysis and Recovery	0.20	\$70.00
Totals:		4.30	\$1,505.00

Gibbons P.C.

Disbursement Detail
Run Date: 2/1/2023

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

Disbursement Type: **Expedited Delivery Service (Federal Express)**

10/12/2022	Expedited Delivery Service (Federal Express)	\$59.04
	Total:	\$59.04

Total Disbursements:	\$59.04
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EXHIBIT B

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



February 02, 2023

Mark Conlan, Reciever
Gibbons Law Firm

Invoice Number: 16273
Invoice Period: 10-05-2022 - 12-31-2022

Payment Terms: Net 15

RE: Mediatrix Capital

SEC v. Mediatrix

Time Details

Date	Staff Member	Description	Hours	Rate	Amount
<u>Accounting</u>					
10-13-2022	HD	Updated QuickBooks with all Q3 receipts and disbursements.	2.10	230.00	483.00
10-20-2022	JHC	Reviewed RMA invoice and submitted to E. Rosen (.3). Reviewed incoming wire, determined nature of funds, and recorded proceeds in records of the receivership (.2). Discussed status of payments with R. Erektion (.2).	0.70	315.00	220.50
10-21-2022	JHC	Reviewed Q3 2022 quarterly report financial exhibits, made revisions and submitted to E. Rosen and M. Conlan for inclusion with quarterly report.	1.10	315.00	346.50
11-22-2022	JHC	Reviewed and recorded receipt of settlement funds and communicated the same with M. Comforti.	0.40	315.00	126.00
12-21-2022	JHC	Call with M. Conlan regarding interest rate on bank accounts with Stretto. Followed up with Stretto on interest on bank accounts. Communicated with Stretto on bank accounts and related information.	0.60	315.00	189.00
			4.90		1,365.00
<u>Case Administration</u>					
10-05-2022	RE	Prepare and send payments to professionals for Third Quarterly Fee Application and document for file.	0.30	90.00	27.00
10-06-2022	RE	Prepare outgoing international wire for marine repair and document.	0.50	90.00	45.00
10-13-2022	HD	Discussed asset ownership with R. Erektion (.6). Began preparation of the Q3 report (1.5).	2.10	230.00	483.00
10-18-2022	HD	Met with J. Curtis discussing appropriate presentation of exhibits (.2). Finished preparation of the Q3 report and sent to J. Curtis for review (3.7).	3.90	230.00	897.00
10-24-2022	JHC	Email communications with E. Rosen on	0.50	315.00	157.50

<u>Date</u>	<u>Staff Member</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<u>Case Administration</u>					
		information needed for quarterly report (.3). Requested information from H. Denison for quarterly report (.2).			
10-24-2022	HD	Reviewed figures provided by counsel for Q3 report and provided feedback on necessary changes.	0.30	230.00	69.00
10-27-2022	RE	Prepare deposit for settlement payments and document for file (.2). Communications with bank and Receiver's office regarding settlement payments (.1).	0.20	90.00	18.00
11-14-2022	RE	Prepare deposit for settlement payment,	0.20	90.00	18.00
11-28-2022	RE	Generate checks for Florida tax payment and 1197 Lloyds electric bill and document for file.	0.20	90.00	18.00
12-07-2022	RE	Generate payments for professionals for Fourth Quarterly Fee Application and document for file.	0.40	90.00	36.00
12-15-2022	RE	Prepare deposit and document for the file.	0.20	90.00	18.00
			<u>8.80</u>		<u>1,786.50</u>
<u>Forensic/Investigation</u>					
10-27-2022	JHC	Analyzed Autumn Gold documents relative to ability to pay settlement and responded to M. Conforti regarding documents and potential requests. Directed R. Erekson in redeposit of check and accounting issues.	1.30	315.00	409.50
11-01-2022	JHC	Reviewed Autumn Gold additional financial documents produced relative to ability to pay, assets, income and other issues (.5). Responded to M. Conforti regarding potential settlement with Autumn Gold and pass-through nature (.4).	0.90	315.00	283.50
12-01-2022	JHC	Met with and directed K. Swasey in analysis of bank records to find support for payments to broker and documenting of the same.	0.30	315.00	94.50
12-01-2022	KS	Met with J. Curtis to discuss the extraction of bank statements supporting payments to Phenom Ventures, LLC.	0.10	230.00	23.00
12-02-2022	KS	Extracted bank statements containing payments to Phenom Ventures, LLC and highlighted those transactions to support the summary of disbursements schedule previously created.	0.90	230.00	207.00
12-08-2022	JHC	Prepared and sent bank records support for Phenom payments to M. Conforti and provided description of the same, for default judgment filing.	0.50	315.00	157.50
12-20-2022	JHC	Reviewed documents from M. Conforti on Mercury Alternative Fund and claim for reduced repayment.	0.60	315.00	189.00
12-22-2022	JHC	Analyzed documents and transactions for broker Mercury Alternative, including bank records, to update transaction descriptions (.7). Reviewed documents and followed up with M. Conforti (.2).	0.90	315.00	283.50
			<u>5.50</u>		<u>1,647.50</u>
<u>Tax Work</u>					
10-10-2022	JG	Review revised tax returns and disclosures.	2.10	255.00	535.50

Date	Staff Member	Description	Hours	Rate	Amount
<u>Tax Work</u>					
10-11-2022	JG	Compile returns and final review.	0.80	255.00	204.00
10-11-2022	MHC	Review tax matters with J. Gifford.	0.40	315.00	126.00
10-12-2022	JG	Final tax review with M. Connors and prepare for mailing.	1.10	255.00	280.50
10-26-2022	JG	Prepare tax tracking template for 2023.	0.20	255.00	51.00
			4.60		1,197.00
			Total		5,996.00

Time Summary

Staff Member	Hours	Rate	Amount
Heather Denison	8.40	230.00	1,932.00
John H. Curtis	7.80	315.00	2,457.00
Josh Gifford	4.20	255.00	1,071.00
Katelyn Swasey	1.00	230.00	230.00
Matt H. Connors	0.40	315.00	126.00
Raani Erekson	2.00	90.00	180.00
	Total	23.80	5,996.00

Expense Summary

Expense	Amount
Copies	2.55
Overnight Expenses	9.55
PACER	37.20
Postage	5.13
Total Expenses	54.43

Total for this Invoice	6,050.43
Previous Invoice Balance	18,793.92
Payment - 1050 on 12-12-2022	(18,793.92)
Total Amount to Pay as of 02-02-2023	6,050.43

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



Mark Conlan, Reciever
Gibbons Law Firm

February 02, 2023

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

Invoice Number: 16273
Invoice Period: 10-05-2022 - 12-31-2022

REMITTANCE COPY

RE: Mediatrix Capital

Fees	5,996.00
Expenses	54.43
Total for this Invoice	6,050.43
Previous Invoice Balance	18,793.92
Payment - 1050 on 12-12-2022	(18,793.92)
Total Amount to Pay as of 02-02-2023	6,050.43

Project	Balance Due
Mediatrix Capital	6,050.43
Total Amount to Pay	6,050.43

Open Invoices and Credits

Date	Transaction	Project	Amount	Applied	Balance
02-02-2023	Invoice 16273	Mediatrix Capital	6,050.43		6,050.43
				Balance	6,050.43

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



EXHIBIT C

BARNES & THORNBURG LLP

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

[REDACTED]
(310) 284-3880

Invoice 3037946

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

December 9, 2022
Gary O. Caris
00061044-00000026

PAYABLE UPON RECEIPT

Fees for Services	\$	299.00
Other Charges	\$	0.00
Total This Invoice	\$	299.00

REMITTANCE

[REDACTED]

BARNES & THORNBURG LLP

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

[REDACTED]
(310) 284-3880

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

Invoice 3037946

Page 2

December 9, 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 November 30, 2022 as described on the attached detail.

Fees for Services	\$	<u>299.00</u>
Total This Invoice	\$	299.00

00061044-00000026 ROBB EVANS & ASSOCIATES LLC

Page 3

MEDIATRIX CAPITAL, INC.

Summary of Invoice

LEGAL ACTIVITIES

11/01/22	GOC	Analyzed e-mail from A. Jen regarding electric bill for 1197 Lloyds Road.	0.10	
11/01/22	GOC	Prepared and sent e-mail to Conlan regarding electric bill for 1197 Lloyds Road.	0.10	
11/02/22	GOC	Exchanged e-mails with Conlan regarding electric utility bill.	0.10	
11/02/22	GOC	Prepared and sent e-mail to A. Jen regarding electric utility bill.	0.10	
11/16/22	GOC	Received telephone call from Conlan regarding procedures for rate increases and receivership status.	0.10	
SEC110 ASSET ANALYSIS AND RECOVERY				0.50
Fees for Services			\$	299.00

		Hours	Rate	Amount
Gary O. Caris		0.50	\$598.00	\$299.00
	TOTALS	0.50		\$299.00

BARNES & THORNBURG LLP

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

[REDACTED]
(310) 284-3880

Invoice 3050690

ROBB EVANS & ASSOCIATES LLC
ATTN: ANITA JEN
245 E. MAIN STREET, SUITE 115
ALHAMBRA, CA 91801

January 13, 2023
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 300
Los Angeles, CA 90067 U.S.A.

[REDACTED]
(310) 284-3880

ROBB EVANS & ASSOCIATES LLC
ATTN: ANITA JEN
245 E. MAIN STREET, SUITE 115
ALHAMBRA, CA 91801

Invoice 3050690

Page 2

January 13, 2023
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 December 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

12/05/22	GOC	Exchanged e-mails with Conlan regarding Brand's e-mails to A. Jen.	0.10	
12/05/22	GOC	Analyzed e-mails from Brand to A. Jen.	0.10	
12/15/22	GOC	Analyzed e-mail from A. Jen forwarding e-mail from Brand; prepared and sent e-mail to Conlan regarding same.	0.10	
SEC110	ASSET ANALYSIS AND RECOVERY			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 OCTOBER 1, 2022 THROUGH DECEMBER 31, 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 October 1, 2022 through December 30, 2022 (the "Fifth 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 \$122,927.55 plus costs of \$2,526.10 for a total of \$125,453.65 for the Fifth Expense Period¹.

5. In accordance with the Receiver Order, I certify that the Fifth 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 Fifth 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 February 21, 2023 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 Fifth Quarterly Fee Application ascribed to them.

EXHIBIT A

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
10/10/2022	E-mails with D. Crapo and E. Rosen re: creditor list.	RE05	02062	MC2	0.10	\$59.85
10/17/2022	Review and receipt of Robb Evans, Barnes Thornsburg, Receiver, and Gibbons invoices for Q3 Quarterly Report (0.1); email and confer with team re: RMA report for Q3 (0.30); email with RMA re: same (0.1).	RE05	26059	ER	0.50	\$137.25
10/17/2022	Review and receipt of Robb Evans, Barnes Thornsburg, Receiver, and Gibbons invoices for Q3 Quarterly Report [0.1]; email and confer with team re: RMA report for Q3 [0.2].	RE05	26059	ER	0.30	\$82.35
10/18/2022	Attend to e-mails with J. Curtis re: information needed for Q3 report (0.2); fact research for same (0.3).	RE05	02062	MC2	0.50	\$299.25
10/19/2022	Draft Q3 Quarterly Report (4th).	RE05	26059	ER	1.20	\$329.40
10/20/2022	Confer with E. Rosen re: quarterly report.	RE05	02548	DC	0.10	\$59.85
10/20/2022	Draft Q3 Quarterly Report (4th) (2.8); confer with team to confirm facts re: same (0.1).	RE05	26059	ER	2.90	\$796.05
10/21/2022	Review accounting reports for Q3 2022; e-mails with E. Rosen, D. Crapo and J. Curtis re: same.	RE05	02062	MC2	0.10	\$59.85
10/24/2022	Telephone call with E. Rosen re: Q3 report (0.1); e-mails with D. Crapo and M. Conforti re: same (0.1).	RE05	02062	MC2	0.20	\$119.70
10/24/2022	Attend to e-mails with E. Rosen and J. Curtis re: accounting needed for Q3 report.	RE05	02062	MC2	0.10	\$59.85
10/24/2022	Review and receipt of RMA reports and invoice for Q3 Quarterly Report (0.1); draft portions of Q3 Quarterly Report (1.8); redact RMA report (0.1); detailed email and confer with team and RMA re: same (0.1).	RE05	26059	ER	2.10	\$576.45
10/25/2022	Quarterly Report preparation.	RE05	02548	DC	0.80	\$478.80
10/26/2022	Working on Q3 2002 report.	RE05	02062	MC2	1.20	\$718.20
10/26/2022	Telephone calls with E. Rosen re: Q3 2022 Report.	RE05	02062	MC2	0.20	\$119.70
10/26/2022	Review and respond to e-mails from M. Conlan and E. Rosen re: quarterly report.	RE05	02548	DC	0.30	\$179.55
10/26/2022	Review of and revisions to quarterly status report.	RE05	02548	DC	0.10	\$59.85
10/26/2022	Draft portions of Receiver's 4th Quarterly Report (1.0); draft portions of Certificate of Service for same (0.1); email with team re: same (0.3).	RE05	26059	ER	1.40	\$384.30
10/27/2022	Prepare Receiver's 4th Quarterly Report and exhibits for Q3 2022 for electronic filing (0.5); file and serve same (0.2); review and receipt of same (0.1); coordinate email and mail service of same (0.2); email with team re: same (0.1).	RE05	26059	ER	1.10	\$301.95
10/28/2022	E-mails to/from M. Conlan and E. Rosen re: impact of settlement on quarterly report.	RE05	02548	DC	0.30	\$179.55
10/28/2022	Confer with M. Conlan re: quarterly report.	RE05	02548	DC	0.10	\$59.85
10/31/2022	E-mails to/from E. Rosen re: quarterly report.	RE05	02548	DC	0.20	\$119.70
10/31/2022	Review latest draft of quarterly status report.	RE05	02548	DC	0.20	\$119.70
	Sub-Total For Task:	RE05			14.00	\$5,301.00
10/18/2022	Confer with P. Ulrich re: Mediatix tax returns.	B70	02062	MC2	0.40	\$239.40
10/18/2022	Review 2021 QSF return to be filed.	B70	00168	PJU	0.30	\$179.55
10/18/2022	Research regulations under IRC Section 468B regarding qualified settlement funds.	B70	00168	PJU	0.10	\$59.85
10/18/2022	Confer with M. Conlan regarding results of review of 2021 return for qualified settlement fund.	B70	00168	PJU	0.10	\$59.85
10/31/2022	Telephone call and e-mail with G. Borak re: Request for Prompt Assessment of Taxes.	B70	02062	MC2	0.10	\$59.85
	Sub-Total For Task:	B70			1.00	\$598.50
10/03/2022	Draft Broker complaint (1.1); research effect of filing same (0.8).	B62	30541	MAC	1.90	\$778.05
10/03/2022	Emails with Broker defendant finalizing settlement agreement.	B62	30541	MAC	0.20	\$81.90
10/03/2022	Review and revise net winner's settlement agreement.	B62	30541	MAC	0.40	\$163.80
10/03/2022	Emails with Broker defendant re: case management and logistics.	B62	30541	MAC	0.40	\$163.80
10/03/2022	Telephone calls with M. Conforti and D. Barney re: preparing and filing supplemental broker complaint.	B62	02062	MC2	0.50	\$299.25
10/03/2022	Review draft complaint against broker defendants.	B62	02062	MC2	0.30	\$179.55
10/03/2022	Attending to e-mails with team re: filing supplemental broker complaint.	B62	02062	MC2	0.20	\$119.70
10/03/2022	E-mails to/from M. Conforti re: settlement with net winner.	B62	02548	DC	0.10	\$59.85
10/03/2022	E-mails to/from Michael and Maria Young's attorney, Tracy Ashmore, re: claims against charities.	B62	02548	DC	0.10	\$59.85
10/03/2022	Review e-mails between M. Conforti and net winner re: settlement.	B62	02548	DC	0.10	\$59.85
10/03/2022	Review e-mails between M. Conforti and net winner counsel re: settlement.	B62	02548	DC	0.10	\$59.85

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
10/03/2022	E-mails to/from M. Conforti re: Receiver's claim against broker, K8EDW	B62	02548	DC	0.20	\$119.70
10/03/2022	Review draft of avoidance complaint against K8EDW	B62	02548	DC	0.20	\$119.70
10/03/2022	E-mails to/from net winner counsel re: settlement meeting.	B62	02548	DC	0.10	\$59.85
10/03/2022	Review e-mails between M. Conforti and net winner counsel re: settlement.	B62	02548	DC	0.10	\$59.85
10/03/2022	Initiate case opening and file complaint per M. Conforti.	B62	26048	NM3	0.40	\$82.80
10/04/2022	Revise motion to hold M. Stewart in contempt (0.4); emails re: same (0.1).	B62	02518	DEB	0.50	\$299.25
10/04/2022	Finalize settlement agreement with Net Winner and circulate same with the Net Winner.	B62	30541	MAC	0.30	\$122.85
10/04/2022	Finalize settlement agreement with different net winner and circulate same with that net winner.	B62	30541	MAC	0.30	\$122.85
10/04/2022	Finalize settlement agreement with Broker defendant (0.2); circulate same (0.1).	B62	30541	MAC	0.30	\$122.85
10/04/2022	Telephone call with Net Winner regarding edits to settlement agreement; circulate fully executed settlement with net winner.	B62	30541	MAC	0.20	\$81.90
10/04/2022	Emails with Broker defendant's counsel exploring settlement.	B62	30541	MAC	0.20	\$81.90
10/04/2022	Emails with Net Winner and Broker regarding settlement agreements.	B62	30541	MAC	0.30	\$122.85
10/04/2022	Work on new Broker complaint (0.5); prepare Summons and civil cover sheet re: same (0.3).	B62	30541	MAC	0.80	\$327.60
10/04/2022	E-mails with M. Conforti re: avoidance settlements.	B62	02062	MC2	0.10	\$59.85
10/04/2022	Review settlement stipulations for three net winners with M. Conforti (0.2); review and sign same (0.1).	B62	02062	MC2	0.30	\$179.55
10/04/2022	Review and revise Conlan Declaration in support of Stewart Contempt Motion (0.8), conforming edits to brief (0.7).	B62	02062	MC2	1.50	\$897.75
10/04/2022	Telephone call with M. Conforti re: withdrawal of second broker complaint.	B62	02062	MC2	0.10	\$59.85
10/04/2022	Draft e-mails to M. Stewart and V. Drohan re: contempt motion against M. Stewart.	B62	02062	MC2	0.20	\$119.70
10/04/2022	Review e-mails between M. Conforti and net winner counsel re: settlement.	B62	02548	DC	0.10	\$59.85
10/04/2022	Review e-mails between M. Conforti and net winner counsel re: settlement.	B62	02548	DC	0.10	\$59.85
10/04/2022	Review e-mails between M. Conforti and net winner re: settlement.	B62	02548	DC	0.10	\$59.85
10/04/2022	Confer with Judge Moore's law clerk re: complaint against brokers.	B62	02548	DC	0.20	\$119.70
10/04/2022	E-mails to/from M. Conforti and M. Conlan re: K8EDW complaint.	B62	02548	DC	0.30	\$179.55
10/04/2022	Review e-mails between M. Conforti and net winner re: settlement.	B62	02548	DC	0.10	\$59.85
10/04/2022	Confer with M. Conlan re: Equiti document production.	B62	02548	DC	0.20	\$119.70
10/04/2022	E-mails to/from M. Conforti and broker counsel, O. Smith, re: settlement discussion.	B62	02548	DC	0.20	\$119.70
10/04/2022	Draft Contempt Motion (0.8); draft Declaration in support of Contempt Motion (.8); prepare exhibits for electronic filing (1.0); confer and email with team re: same (0.1).	B62	26059	ER	2.70	\$741.15
10/05/2022	Call and emails with Broker defendant re: settlement.	B62	30541	MAC	0.20	\$81.90
10/05/2022	Emails with Net Winner finalizing settlement terms.	B62	30541	MAC	0.10	\$40.95
10/05/2022	Telephone call with J. Deckenbach (Stewart's criminal counsel) re: contempt motion.	B62	02062	MC2	0.10	\$59.85
10/05/2022	Review and revise Stewart contempt motion, brief, declaration and proposed form of order (0.8); e-mails with team re: same (0.2).	B62	02062	MC2	1.00	\$598.50
10/05/2022	Review e-mails from net winner re: settlement.	B62	02548	DC	0.10	\$59.85
10/05/2022	E-mail to M. Conforti re: net winner settlement.	B62	02548	DC	0.10	\$59.85
10/05/2022	Review e-mails between M. Conforti and net winner re: settlement.	B62	02548	DC	0.20	\$119.70
10/05/2022	Confer with counsel for Crown Capital re: settlement.	B62	02548	DC	0.20	\$119.70
10/05/2022	EFile Civil Cover Sheet and Summonses per M. Conforti.	B62	26048	NM3	0.50	\$103.50
10/05/2022	Draft Proposed Order (0.2); draft portions of Contempt Motion and Declaration in support of Contempt Motion (0.6); prepare additional exhibit for electronic filing (0.2); email with team re: same (0.1).	B62	26059	ER	1.10	\$301.95
10/06/2022	Emails to/from J. Cunningham re: repairs to M/V Currenseas (0.2); confer with M. Conlan re: same (0.1).	B62	02518	DEB	0.30	\$179.55
10/06/2022	Review due diligence on Guardian Group (0.2); confer with D. Crapo re: resolution of charity avoidance action (0.2).	B62	02062	MC2	0.40	\$239.40
10/06/2022	Attend to email with M. Conforti re: net winner and broker settlement.	B62	02062	MC2	0.10	\$59.85
10/06/2022	Analyze claims against charities.	B62	02548	DC	0.20	\$119.70
10/06/2022	Review e-mails between M. Conforti and net winner re: settlement.	B62	02548	DC	0.10	\$59.85
10/07/2022	Edits and revisions to settlement terms with Broker (0.4); share same with their counsel (0.1).	B62	30541	MAC	0.50	\$204.75

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
10/07/2022	Edits and revisions to settlement terms with Net Winner (0.2); share same with the Net Winner (0.1).	B62	30541	MAC	0.30	\$122.85
10/07/2022	E-mails with D. Crapo and SEC team re: charities and document production.	B62	02062	MC2	0.10	\$59.85
10/07/2022	Call with D. Crapo and SEC counsel re: charities avoidance action.	B62	02062	MC2	0.30	\$179.55
10/07/2022	E-mails with T. Ashmore re: charities Motion.	B62	02062	MC2	0.10	\$59.85
10/07/2022	Confer with Equiti's counsel re: document production.	B62	02548	DC	0.20	\$119.70
10/07/2022	E-mails to/from E. Rosen re: document production.	B62	02548	DC	0.10	\$59.85
10/07/2022	E-mails to/from M. Conforti re: settlements with net winners.	B62	02548	DC	0.10	\$59.85
10/07/2022	Review e-mails between M. Conforti and net winner counsel re: settlement.	B62	02548	DC	0.10	\$59.85
10/07/2022	Review e-mails between M. Conforti and net winner re: settlement.	B62	02548	DC	0.10	\$59.85
10/07/2022	E-mail to international process server re: service of K8EDW in UK.	B62	02548	DC	0.10	\$59.85
10/07/2022	E-mail information from international process server to M. Conforti, N. Mitchell and E. Rosen.	B62	02548	DC	0.10	\$59.85
10/07/2022	Review e-mail from net winner re: settlement.	B62	02548	DC	0.10	\$59.85
10/07/2022	Participate in conference call with SEC personnel re: claims against charities.	B62	02548	DC	0.20	\$119.70
10/07/2022	E-mail to counsel for Guardian Group re: dismissal of action.	B62	02548	DC	0.10	\$59.85
10/07/2022	E-mails to/from Michael Young's counsel, Tracy Ashmore, re: dismissal of action against charities.	B62	02548	DC	0.20	\$119.70
10/07/2022	Review and receipt of latest broker and net winner settlements and settlement documentation (0.3); update spreadsheets (0.5) email with team re: same (0.1).	B62	26059	ER	0.90	\$247.05
10/07/2022	Email with team re: document production logistics.	B62	26059	ER	0.30	\$82.35
10/07/2022	Email and confer with team re: same document production (0.1); review and retrieve email from SEC (0.2).	B62	26059	ER	0.30	\$82.35
10/10/2022	Review/revise motion to hold Stewart in contempt (1.2); emails with team re: same (0.2).	B62	02518	DEB	1.40	\$837.90
10/10/2022	Emails regarding settlement with Broker defendant.	B62	30541	MAC	0.10	\$40.95
10/10/2022	Emails regarding settlement with Net Winner.	B62	30541	MAC	0.10	\$40.95
10/10/2022	Emails finalizing two separate settlement agreements.	B62	30541	MAC	0.20	\$81.90
10/10/2022	Review and analyze Youngs' Motion to Terminate Collection Actions against Charities (0.7); fact and legal research in connection with same (0.6); e-mails with D. Crapo and M. Conforti re: same (0.3).	B62	02062	MC2	1.60	\$957.60
10/10/2022	Final review of Stewart Contempt pleadings (0.2); e-mails with E. Rosen and D. Barney re: same (0.2).	B62	02062	MC2	0.40	\$239.40
10/10/2022	Review Shepards Report for contempt brief.	B62	02062	MC2	0.20	\$119.70
10/10/2022	Review e-mail from M. Conforti to J. Curtis re: due diligence on broker defendant.	B62	02062	MC2	0.10	\$59.85
10/10/2022	Review and analyze settlement stipulations with net winner (0.2); telephone call with M. Conforti re: same (0.1); review and sign settlement stipulations for each (0.1).	B62	02062	MC2	0.40	\$239.40
10/10/2022	Telephone call with T. Ashmore re: motion to terminate avoidance claims against charities.	B62	02062	MC2	0.20	\$119.70
10/10/2022	Telephone call with D. Crapo re: avoidance settlements.	B62	02062	MC2	0.10	\$59.85
10/10/2022	Review and revise Stewart Contempt Motion (1.3); e-mails with D. Barney and E. Rosen re: same (0.2).	B62	02062	MC2	1.50	\$897.75
10/10/2022	Review and conform exhibits to supporting declaration re: Stewart Contempt motion.	B62	02062	MC2	0.30	\$179.55
10/10/2022	E-mail from net winner re: settlement.	B62	02548	DC	0.10	\$59.85
10/10/2022	E-mails to/from M. Conlan re: donations to charities by Michael and Maria Young.	B62	02548	DC	0.10	\$59.85
10/10/2022	Review and analyze Michael and Maria Young's renewed motions to enjoin recovery of fraudulent transfers to charities.	B62	02548	DC	0.30	\$179.55
10/10/2022	Review e-mail from M. Conlan re: Young's renewed motion.	B62	02548	DC	0.10	\$59.85
10/10/2022	Begin reviewing pleadings in preparation for opposition to the Youngs' motion to enjoin recovery of fraudulent transfers to charities.	B62	02548	DC	0.20	\$119.70
10/10/2022	Confer with M. Conlan and Tracy Ashmore re: her clients', Michael and Maria Young's renewed motion to halt collection from charities.	B62	02548	DC	0.20	\$119.70
10/10/2022	E-mails to/from E. Rosen re: Equiti document production.	B62	02548	DC	0.10	\$59.85
10/10/2022	E-mail to Equiti's counsel, Steven Senderowitz, re: document production.	B62	02548	DC	0.30	\$179.55
10/10/2022	Research re: authority of receivers to seek recovery of fraudulent transfers to charities.	B62	02548	DC	0.50	\$299.25
10/10/2022	Email with team re: document production protocols.	B62	26059	ER	0.10	\$27.45

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
10/10/2022	Prepare Contempt Motion, Brief in Support, Declaration with exhibits A-O, and Proposed Order for electronic filing [0.8]; file and serve same [0.2]; review and receipt of same [0.1]; coordinate email service [0.2]; email and confer with team re: same [0.3].	B62	26059	ER	1.60	\$439.20
10/10/2022	Assistance to M. Conlan regarding the preparation of documentation for delivery of electronically stored information production.	B62	89266	DW	0.30	\$62.10
10/11/2022	Review M/V Currenseas status (0.3); email to J. Cunningham re: wire instructions (0.2).	B62	02518	DEB	0.50	\$299.25
10/11/2022	Review Minute Order to Show Cause from Judge Moore re: Stewart Contempt Motion.	B62	02062	MC2	0.10	\$59.85
10/11/2022	Telephone call with T. Ashmore re: Stewart Contempt Motion.	B62	02062	MC2	0.20	\$119.70
10/11/2022	Review relevant pleadings and orders in preparation for response to the Youngs' motion to enjoin fraudulent transfers against charities.	B62	02548	DC	1.80	\$1,077.30
10/11/2022	Review and receipt of SEC correspondence (0.1); email with team re: same (0.1).	B62	26059	ER	0.20	\$54.90
10/12/2022	Telephone with J. Cunningham re: confirmation of Compass wire instructions (0.1); telephone with M. Conlan and EW Bank re: same (0.2).	B62	02518	DEB	0.30	\$179.55
10/12/2022	E-mails with D. Crapo re: Notice of Dismissal of charities.	B62	02062	MC2	0.10	\$59.85
10/12/2022	Review relevant documents, pleadings and case law for response to the Youngs' motion to enjoin fraudulent transfers against charities.	B62	02548	DC	3.10	\$1,855.35
10/12/2022	E-mails to/from K. McEvelly re: dismissing charity complaint.	B62	02548	DC	0.10	\$59.85
10/12/2022	Review e-mails between M. Conforti and net winner family member re: settlement of receiver's avoidance claim against mother's trust.	B62	02548	DC	0.10	\$59.85
10/12/2022	Review and receipt of check copy for net winner settlement; email with team re: same.	B62	26059	ER	0.10	\$27.45
10/13/2022	Emails re: wire confirmation to Compass Intl. for M/V Currenseas repair.	B62	02518	DEB	0.20	\$119.70
10/13/2022	Emails finalizing Broker settlement agreement, circulate fully executed agreement with Broker's counsel.	B62	30541	MAC	0.20	\$81.90
10/13/2022	Emails with team re: response to Youngs' motion to halt receiver's collection activities.	B62	30541	MAC	0.20	\$81.90
10/13/2022	Attend to e-mails with D. Crapo and M. Conforti re: response to Youngs' Motion to Terminate Collection Activities.	B62	02062	MC2	0.10	\$59.85
10/13/2022	Review and sign settlement stipulation with broker defendant (0.1); e-mails with M. Conforti and D. Crapo re: same (0.1).	B62	02062	MC2	0.20	\$119.70
10/13/2022	Confer with K. McEvelly re: dismissing charity complaint.	B62	02548	DC	0.10	\$59.85
10/13/2022	Review e-mails between M. Conforti and net winners re: settlement.	B62	02548	DC	0.20	\$119.70
10/13/2022	E-mails to/from M. Conforti re: Youngs' renewed motion to prevent Receiver from recovering fraudulent transfers to charities.	B62	02548	DC	0.10	\$59.85
10/13/2022	Draft Notice of Voluntary Dismissal (Charity Case).	B62	30611	KPM	0.70	\$229.95
10/13/2022	Draft demand letter to bank (0.8); confer and email with team re: same (0.1).	B62	26059	ER	0.90	\$247.05
10/14/2022	Review Notice of Acceptance from T Squared Contractors and K. Stewart; e-mails with D. Crapo re: same.	B62	02062	MC2	0.10	\$59.85
10/14/2022	E-mails with D. Crapo re: asset freeze violation claims.	B62	02062	MC2	0.10	\$59.85
10/14/2022	Review and respond to e-mail (including attachments) from Equiti's counsel, Steven Senderowitz, re: document production.	B62	02548	DC	0.30	\$179.55
10/14/2022	Review notice from K. Stewart and her business, T Squared, in response to payment demand.	B62	02548	DC	0.10	\$59.85
10/14/2022	E-mails to/from M. Conlan re: response to notice from K. Stewart and her business, T Squared, in response to payment demand and next steps with respect to actions against members of the Stewart family and attorney James Roche II re: recovery of property transferred in violation of the asset freeze order.	B62	02548	DC	0.20	\$119.70
10/14/2022	Review and revise notice of dismissal of the complaint against charities.	B62	02548	DC	0.10	\$59.85
10/14/2022	E-mails to/from K. McEvelly re: dismissal of complaint against charities.	B62	02548	DC	0.10	\$59.85
10/14/2022	Prepare settlement agreement with Mary Mother of God Mission Society.	B62	02548	DC	0.50	\$299.25
10/14/2022	E-mail to T. Hogan, counsel to MMGMS re settlement agreement.	B62	02548	DC	0.10	\$59.85
10/17/2022	Emails with opposing counsel regarding settlement payment terms.	B62	30541	MAC	0.20	\$81.90
10/17/2022	Review and sign Protective Order (0.1); telephone call and e-mails with D. Crapo re: same (0.1).	B62	02062	MC2	0.20	\$119.70
10/17/2022	Review e-mails between M. Conforti and net winners re: settlements.	B62	02548	DC	0.20	\$119.70
10/17/2022	Review and respond to e-mail (including attachments) from Equiti's counsel, Steven Senderowitz, re: Equiti document production.	B62	02548	DC	0.30	\$179.55
10/17/2022	Review proposed certification concerning Equiti document production.	B62	02548	DC	0.10	\$59.85
10/17/2022	E-mails to/from M. Conlan re: certification.	B62	02548	DC	0.10	\$59.85
10/17/2022	Confer with M. Conlan re: Equiti document production.	B62	02548	DC	0.10	\$59.85

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
10/17/2022	Begin review of Equiti documents.	B62	02548	DC	0.50	\$299.25
10/17/2022	E-mail to Jeff Eager, counsel to charity, re: avoidance action.	B62	02548	DC	0.10	\$59.85
10/17/2022	File Notice of Dismissal per D. Crapo	B62	26048	NM3	0.10	\$20.70
10/17/2022	Confer with team re: non-delivery of demand letter.	B62	26059	ER	0.10	\$27.45
10/18/2022	E-mails with T. Ashmore re: contempt motion.	B62	02062	MC2	0.10	\$59.85
10/18/2022	Attend to correspondence with Wells Fargo Bank re: Women's Football Conference account.	B62	02062	MC2	0.10	\$59.85
10/18/2022	Confer with D. Crapo re: pre-litigation discovery on asset freeze violations.	B62	02062	MC2	0.20	\$119.70
10/18/2022	Attend to e-mails with D. Crapo and SEC team re: joinder to protective order and document production.	B62	02062	MC2	0.20	\$119.70
10/18/2022	Confer with M. Conlan re: enforcement of claims.	B62	02548	DC	0.20	\$119.70
10/18/2022	Review court notice in K8EDW avoidance action.	B62	02548	DC	0.20	\$119.70
10/18/2022	Consider service of process issues.	B62	02548	DC	0.30	\$179.55
10/18/2022	E-mails to/from M. Conforti re: procedural steps in K8EDW avoidance action, including service.	B62	02548	DC	0.30	\$179.55
10/18/2022	E-mail to broker defendant re: Receiver's claims.	B62	02548	DC	0.10	\$59.85
10/18/2022	Confer with M. Conlan re: litigation.	B62	02548	DC	0.10	\$59.85
10/18/2022	E-mails to/from Aaron Lukken of Viking re: service in K8EDW avoidance action.	B62	02548	DC	0.10	\$59.85
10/18/2022	Confer with M. Conlan re: nature of Equiti payment to Receiver.	B62	02548	DC	0.10	\$59.85
10/18/2022	Detailed email with M. Conforti re: Conlan v. K8EDW summonses and appearance.	B62	26059	ER	0.20	\$54.90
10/18/2022	Assistance to D. Crapo regarding preparation of document production for attorney review.	B62	89266	DW	3.80	\$786.60
10/18/2022	Communications with D. Crapo and M. Conforti regarding new production of documents in matter.	B62	89266	DW	0.20	\$41.40
10/19/2022	Review emails and order re: contempt motion.	B62	02518	DEB	0.30	\$179.55
10/19/2022	Attention to summons and service of same in the broker-defendant complaint.	B62	30541	MAC	0.30	\$122.85
10/19/2022	Draft notice of appearances for both broker-defendant actions.	B62	30541	MAC	0.10	\$40.95
10/19/2022	Draft Notice of voluntary dismissal for settled broker-defendant.	B62	30541	MAC	0.10	\$40.95
10/19/2022	Telephone call with SEC counsel re: Contempt Order.	B62	02062	MC2	0.30	\$179.55
10/19/2022	E-mails with E. Rosen re: follow-up to Stewart contempt order.	B62	02062	MC2	0.20	\$119.70
10/19/2022	Telephone calls and e-mails with T. Ashmore re: contempt order.	B62	02062	MC2	0.10	\$59.85
10/19/2022	Review court notice in K8EDW adversary proceeding.	B62	02548	DC	0.10	\$59.85
10/19/2022	E-mail to net winner re: resolution of Receiver's claim against him.	B62	02548	DC	0.20	\$119.70
10/19/2022	E-mail to re: resolution of receiver's avoidance claim against his client, Mercury Alternative.	B62	02548	DC	0.20	\$119.70
10/19/2022	Review contempt order against defendant, Michael Stewart.	B62	02548	DC	0.20	\$119.70
10/19/2022	E-mails to/from international process server re: service of defendants in the UK and the Cayman Islands.	B62	02548	DC	0.20	\$119.70
10/19/2022	Confer with M. Conlan re: enforcement of order on contempt motion (0.1); confer with chambers re: execution and enforcement of order (0.1); email with M. Conlan re: same (0.1); email with M. Conlan re: demand letter (0.1).	B62	26059	ER	0.40	\$109.80
10/19/2022	Prepare broker complaints Notices of Appearance of M. Conforti for electronic filing (0.1); file and serve same (0.1); email with team re: same (0.1).	B62	26059	ER	0.30	\$82.35
10/19/2022	Prepare Notice of Voluntary Dismissal for electronic filing; file and serve same.	B62	26059	ER	0.10	\$27.45
10/19/2022	Review and receipt of Wells Fargo demand letter and response (0.1); confer with team re: same (0.1).	B62	26059	ER	0.20	\$54.90
10/19/2022	Confer with Clerk's Office regarding issuance of Conlan v. K8EDW summons (0.1); detailed email with M. Conforti re: same and regarding international service (0.2).	B62	26059	ER	0.30	\$82.35
10/19/2022	Email with process server regarding domestic service and status of international service (0.1); research to confirm defendant current address (0.6); email and confer with team re: same (0.3).	B62	26059	ER	1.00	\$274.50
10/19/2022	Research and retrieve company corporate information for defendant as per M. Conlan.	B62	40027	RT1	1.00	\$265.00
10/19/2022	Research and retrieve contact information for defendant as per E. Rosen.	B62	40027	RT1	0.50	\$132.50
10/19/2022	Assistance to D. Crapo regarding preparation of document production for attorney review.	B62	89266	DW	2.20	\$455.40
10/20/2022	Confer with M. Conlan re: M. Stewart's request for stay of contempt order and review/revise email in response to same (0.4); review motion for stay. (0.3)	B62	02518	DEB	0.70	\$418.95
10/20/2022	Confer with D. Whitford re: setting up Relativity database; e-mails with SEC team re: same.	B62	02062	MC2	0.10	\$59.85

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
10/20/2022	Review Stewart's Motion for Appointment of Counsel.	B62	02062	MC2	0.10	\$59.85
10/20/2022	Review correspondence from SEC personnel re: SEC document production (0.1); confer with D. Whitford re: hosting same (0.1).	B62	02062	MC2	0.20	\$119.70
10/20/2022	Review Order appointing public defender to represent M. Stewart in contempt proceedings.	B62	02062	MC2	0.10	\$59.85
10/20/2022	Telephone call with M. Stewart's counsel, J. Deckenbach, re: stay of Contempt Order.	B62	02062	MC2	0.20	\$119.70
10/20/2022	Attend to settlement with charity settlement (0.1); confer with D. Crapo re: same (0.1).	B62	02062	MC2	0.20	\$119.70
10/20/2022	Telephone call with SEC Counsel re: Stewart Contempt Order.	B62	02062	MC2	0.20	\$119.70
10/20/2022	Draft detailed e-mail to J. Deckenbach re: requested stay of contempt order.	B62	02062	MC2	1.00	\$598.50
10/20/2022	Fact research on Stewart address (0.1); telephone call with Deputy at US Marshal's Denver office (0.1).	B62	02062	MC2	0.20	\$119.70
10/20/2022	Review Defendant Michael Stewart's motion for appointment of counsel and related correspondence.	B62	02548	DC	0.30	\$179.55
10/20/2022	E-mail to M. Conlan re: settlement.	B62	02548	DC	0.10	\$59.85
10/20/2022	Confer with M. Conlan re: settlement.	B62	02548	DC	0.10	\$59.85
10/20/2022	E-mails to/from international process server re: service on K8EDW.	B62	02548	DC	0.10	\$59.85
10/20/2022	Confer and email with M. Conlan re: status of action on Contempt Order.	B62	26059	ER	0.10	\$27.45
10/20/2022	Communication with SEC personnel regarding retrieval of documents from hard drive.	B62	89266	DW	0.10	\$20.70
10/20/2022	Communication with M. Conlan regarding retrieval of SEC production.	B62	89266	DW	0.10	\$20.70
10/21/2022	Review/revise opposition to M. Stewart's motion to stay contempt order and court order granting 10-day stay.	B62	02518	DEB	0.80	\$478.80
10/21/2022	Attention to motion to stay the contempt order, including the Receiver's opposition thereto.	B62	30541	MAC	0.40	\$163.80
10/21/2022	Call with third-party vendor re: effectuating international service of broker complaint.	B62	30541	MAC	0.50	\$204.75
10/21/2022	Emails regarding logistics of international service.	B62	30541	MAC	0.10	\$40.95
10/21/2022	Draft objection to Stewart Motion to Stay Contempt Order (1.3); e-mails with D. Barney re: same (0.2).	B62	02062	MC2	1.50	\$897.75
10/21/2022	Review Court's Order granting in part and denying in part Stewart's Motion for Stay of Contempt Order.	B62	02062	MC2	0.10	\$59.85
10/21/2022	E-mails to/from broker's counsel, B. Browne, and M. Conforti re: resolution of Receiver's claim.	B62	02548	DC	0.20	\$119.70
10/21/2022	Review e-mails between M. Conforti and net winner counsel.	B62	02548	DC	0.10	\$59.85
10/21/2022	Confer with international process server concerning service on K8EDW in UK.	B62	02548	DC	0.50	\$299.25
10/21/2022	Review international process server retention agreement.	B62	02548	DC	0.10	\$59.85
10/21/2022	E-mails to/from D. Whitford re: Equiti document production.	B62	02548	DC	0.10	\$59.85
10/21/2022	Review Defendant Michael Stewart's motion to stay contempt order (0.1); response to same and court's order on same (0.2).	B62	02548	DC	0.30	\$179.55
10/21/2022	E-file and serve Receiver's Objections to Motion to Stay.	B62	26048	NM3	0.40	\$82.80
10/21/2022	Communications with D. Crapo regarding the delivery of document production for review.	B62	89266	DW	0.20	\$41.40
10/22/2022	Review email to M. Stewart's counsel re: contempt order (0.3); confer with M. Conlan re: same (0.2).	B62	02518	DEB	0.50	\$299.25
10/24/2022	Attend to e-mails with R. Fitzgerald and SEC team re: eDiscovery hosting expense.	B62	02062	MC2	0.20	\$119.70
10/24/2022	Telephone call with D. Whitford re: cost of loading and hosting SEC production.	B62	02062	MC2	0.10	\$59.85
10/24/2022	Telephone call with SEC Counsel re: third party data hosting cost.	B62	02062	MC2	0.10	\$59.85
10/24/2022	Telephone call with D. Whitford re: third-party data hosting costs.	B62	02062	MC2	0.20	\$119.70
10/24/2022	Telephone call with R. Fitzgerald re: e-discovery vendor pricing.	B62	02062	MC2	0.30	\$179.55
10/24/2022	Draft opposition to Youngs' motion block attempts to recover fraudulent transfers to charities.	B62	02548	DC	6.10	\$3,650.85
10/24/2022	E-mail to M. Conlan re: opposition to Young's renewed motion.	B62	02548	DC	0.10	\$59.85
10/24/2022	E-mails to/from broker's counsel, B. Browne, and M. Conforti re: resolution of Receiver's claim.	B62	02548	DC	0.10	\$59.85
10/24/2022	Review Notice in K8EDW avoidance action.	B62	02548	DC	0.10	\$59.85
10/24/2022	Draft Amended Summons Requests for defendant Alternative Asset Management in broker complaint 22-1496 and defendant K8EDW in broker complaint 22-2602 (0.7); file and serve same (0.2); email with team re: same.	B62	26059	ER	0.90	\$247.05
10/24/2022	Detailed email with M. Rinsky re: broker defendant domestic service and international service to Alternative Asset Management and K8EDW (0.4); confer with M. Conlan, M. Conforti and process servers re: same (0.4).	B62	26059	ER	0.80	\$219.60

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
10/24/2022	Assistance to M. Conlan regarding review of SEC document production.	B62	89266	DW	1.80	\$372.60
10/25/2022	Emails re: data hosting and status of MV Currenseas.	B62	02518	DEB	0.30	\$179.55
10/25/2022	Attend to e-mails with D. Crapo, M. Conforti and E. Rosen re: Cayman Islands service issues.	B62	02062	MC2	0.10	\$59.85
10/25/2022	E-mail to M. Conlan, M. Conforti and E. Rosen re: UK broker defendant.	B62	02548	DC	0.10	\$59.85
10/25/2022	Review and analyze engagement letter from Viking Law for effecting service in the UK.	B62	02548	DC	0.30	\$179.55
10/25/2022	Review and respond to e-mails from E. Rosen and M. Conlan re: service on overseas defendants.	B62	02548	DC	0.30	\$179.55
10/25/2022	E-mail to M. Conan re: service on K8EDW in UK.	B62	02548	DC	0.10	\$59.85
10/25/2022	E-mails to/from Bryan Harrison, counsel for Mercury Alternative, re: settlement of Receiver's claim.	B62	02548	DC	0.20	\$119.70
10/25/2022	E-mail to B. Brown re: settlement with his broker defendant client.	B62	02548	DC	0.10	\$59.85
10/25/2022	Detailed email with team re: Alternative Asset Management international service (0.2); research re: same (0.1); confer with process server and team re: same (0.1); email with process server re: same (0.1).	B62	26059	ER	0.50	\$137.25
10/25/2022	Review and receipt of Amended Summons for broker defendant (0.1); email with team re: same (0.1).	B62	26059	ER	0.20	\$54.90
10/25/2022	Communications with SEC personnel regarding the document production.	B62	89266	DW	0.30	\$62.10
10/25/2022	Assistance to M. Conlan regarding the review of SEC document production.	B62	89266	DW	2.10	\$434.70
10/26/2022	Telephone with S. Smith re: Custody of M/V Currenseas.	B62	02518	DEB	0.20	\$119.70
10/26/2022	Emails to/from J. Cunningham and M. Conlan re: location of M/V Currenseas.	B62	02518	DEB	0.30	\$179.55
10/26/2022	Telephone with J. Cunningham re: same custody of M/V Currenseas.	B62	02518	DEB	0.20	\$119.70
10/26/2022	Spoke with attorney for one of the Broker defendants.	B62	30541	MAC	0.10	\$40.95
10/26/2022	Draft Broker defendant settlement agreement.	B62	30541	MAC	0.40	\$163.80
10/26/2022	Review and revise opposition to Youngs' Renewed Motion to Terminate Collection Activities (1.5); e-mails with D. Crapo re: same (0.2).	B62	02062	MC2	1.70	\$1,017.45
10/26/2022	Telephone call with D. Whitford re: Statement of Work for hosting SEC document production.	B62	02062	MC2	0.10	\$59.85
10/26/2022	E-mails to/from M. Conlan re: Defendant Michael Stewart's failure to comply with contempt order and his criminal trial.	B62	02548	DC	0.10	\$59.85
10/26/2022	E-mails to/from M. Conlan re: service of K8EDW in the UK; (ii) expert witness for avoidance action; and (iii) response to the Young's charity motion.	B62	02548	DC	0.30	\$179.55
10/26/2022	Confer with M. Conforti and broker counsel, B. Browne, re: settlement.	B62	02548	DC	0.10	\$59.85
10/26/2022	Final revisions to opposition to Young's charity motion.	B62	02548	DC	0.30	\$179.55
10/26/2022	E-mail to E. Rosen re: opposition to Youngs' charities motion.	B62	02548	DC	0.10	\$59.85
10/26/2022	Monitor criminal docket for status of trial; email with M. Conlan re: same (0.1); docket tentative trial dates (0.1).	B62	26059	ER	0.20	\$54.90
10/26/2022	Review and receipt of Amended Summons for defendant K8EDW Ltd. in Conlan v. same; assemble service packages for K8EDW and Alternative Asset Management in England (0.1); email with team re: same (0.1); email with process server re: same (0.1).	B62	26059	ER	0.30	\$82.35
10/26/2022	Email with D. Whitford re: information for database software project; confer with D. Whitford re: same (0.1); confer with M. Conlan re: same (0.1).	B62	26059	ER	0.20	\$54.90
10/26/2022	Review text order on stay of Stewart Contempt Order (0.1); docket deadlines re: same (0.1); email with team re: same (0.1)	B62	26059	ER	0.30	\$82.35
10/27/2022	Review status of M/V Currenseas (0.2), confer with M. Conlan re: same (0.1); email to J. Cunningham re: same (0.2).	B62	02518	DEB	0.50	\$299.25
10/27/2022	Emails with Net Winner discussing settlement payment.	B62	30541	MAC	0.10	\$40.95
10/27/2022	Emails with Net Winner discussing settlement agreement terms.	B62	30541	MAC	0.10	\$40.95
10/27/2022	Emails with accountants discussing Broker defendant defenses.	B62	30541	MAC	0.10	\$40.95
10/27/2022	E-mails with Broker defendant re: claims and defenses.	B62	30541	MAC	0.10	\$40.95
10/27/2022	Review Broker defendant's documents, tax returns, and bank statements with accountants.	B62	30541	MAC	0.60	\$245.70
10/27/2022	Attend to email with Broker defendant re: settlement.	B62	30541	MAC	0.40	\$163.80
10/27/2022	Emails with accountants regarding payments made to two Net Winners and one Broker.	B62	30541	MAC	0.20	\$81.90
10/27/2022	Attend to e-mails with EastWest Bank, R. Erekson and M. Conforti re: returned check from avoidance action defendant.	B62	02062	MC2	0.10	\$59.85
10/27/2022	Review e-mails between M. Conforti and net winners re: settlement.	B62	02548	DC	0.40	\$239.40
10/27/2022	Confer with E. Rosen re: opposition to Youngs' charity motion.	B62	02548	DC	0.10	\$59.85

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
10/27/2022	Confer with M. Conlan re: opposition to Youngs' charity motion.	B62	02548	DC	0.10	\$59.85
10/27/2022	Email and confer with team re: status of service on broker defendant (0.1); fact research re: same (0.1).	B62	26059	ER	0.20	\$54.90
10/27/2022	Prepare Receiver's Opposition to Youngs' Renewed Charities Motion for electronic filing (0.6); draft Certificate of Service re: same (0.1); confer and email with team re: same (0.1).	B62	26059	ER	0.80	\$219.60
10/27/2022	Communications with SEC personnel regarding the document production.	B62	89266	DW	0.30	\$62.10
10/27/2022	Assistance to M. Conlan regarding review of SEC document production.	B62	89266	DW	0.50	\$103.50
10/28/2022	Confer with M. Conlan re: M. Stewart's surrender to titles to vehicles and M/V Currenseas.	B62	02518	DEB	0.40	\$239.40
10/28/2022	Review letter from J. Deckenbach re: vehicle and vessel titles.	B62	02518	DEB	0.30	\$179.55
10/28/2022	Telephone with J. Cunningham re: M/V Currenseas status.	B62	02518	DEB	0.30	\$179.55
10/28/2022	Telephone with SEC Counsel and M. Conlan re: status of vehicles and vessels.	B62	02518	DEB	0.60	\$359.10
10/28/2022	Telephone calls with SEC Counsel and D. Crapo re: Motion to Terminate Collection actions against charities.	B62	02062	MC2	0.30	\$179.55
10/28/2022	Review docket in charities avoidance action (0.1); e-mail to SEC counsel re: same (0.1).	B62	02062	MC2	0.20	\$119.70
10/28/2022	Telephone calls with D. Crapo and SEC counsel re: charity settlements.	B62	02062	MC2	0.10	\$59.85
10/28/2022	E-mails with D. Whitford and SEC counsel re: data hosting costs.	B62	02062	MC2	0.10	\$59.85
10/28/2022	Telephone call with SEC Counsel re: motion to terminate charity collections.	B62	02062	MC2	0.30	\$179.55
10/28/2022	Telephone call with D. Crapo re: revisions to brief in opposition to Youngs' motion to terminate charity collections (0.1); revisions to same (0.1).	B62	02062	MC2	0.20	\$119.70
10/28/2022	Review e-mails between M. Conforti and net winners or brokers re: settlement of Receiver's claims.	B62	02548	DC	0.20	\$119.70
10/28/2022	E-mails to/from D. Whitford re: Equiti document production.	B62	02548	DC	0.10	\$59.85
10/28/2022	Confer with M. Conlan re: opposition to Youngs' charities motion.	B62	02548	DC	0.20	\$119.70
10/28/2022	Revisions to the Receiver's opposition to the Youngs' charities motion per comments by the SEC.	B62	02548	DC	1.70	\$1,017.45
10/28/2022	Review letter from MMGMS re: settlement.	B62	02548	DC	0.10	\$59.85
10/30/2022	Review and revise brief in opposition to Youngs' Motion to Terminate Collection Activities.	B62	02062	MC2	1.00	\$598.50
10/31/2022	Review opposition to Youngs' motion to terminate claims against charities.	B62	02518	DEB	0.30	\$179.55
10/31/2022	Emails from M. Conlan and J. Deckenbach re: retrieval of vehicle and boat titles.	B62	02518	DEB	0.20	\$119.70
10/31/2022	Review asset freeze order.	B62	02518	DEB	0.40	\$239.40
10/31/2022	Telephone with marina re: location and surrender of M/V Currenseas (0.4); review emails re: same and confer with M. Conlan re: same (0.3).	B62	02518	DEB	0.70	\$418.95
10/31/2022	Revise letter to J. Deckenbach re: titles to vehicles and vessels.	B62	02518	DEB	0.50	\$299.25
10/31/2022	Review Stewart Declarations filed in support of Release of Asset Freeze re: alleged disability.	B62	02062	MC2	0.30	\$179.55
10/31/2022	Review and analyze letter from J. Deckenbach re: Stewart motor vehicles (0.7); fact research on same (0.8); prepare response letter to J. Deckenbach (0.4); e-mails with D. Crapo and D. Barney re: same (0.2).	B62	02062	MC2	2.10	\$1,256.85
10/31/2022	Review SEC's Opposition to Youngs' Motion to Terminate Collection Activities Against Charities.	B62	02062	MC2	0.10	\$59.85
10/31/2022	Review e-mails between M. Conforti and two net winners re: settlement of Receiver's claim.	B62	02548	DC	0.10	\$59.85
10/31/2022	E-mails to/from M. Conlan re: defendant Michael Stewart's interest in T-Squared.	B62	02548	DC	0.10	\$59.85
10/31/2022	Respond to e-mail from net winner re: Receiver's claim.	B62	02548	DC	0.10	\$59.85
10/31/2022	Review letter from M. Conlan to counsel for Defendant Michael Stewart re: frozen assets and contempt issues.	B62	02548	DC	0.20	\$119.70
10/31/2022	Further revisions to opposition to the Youngs' renewed charities motion.	B62	02548	DC	1.20	\$718.20
10/31/2022	Review authority re: suing religious organizations.	B62	02548	DC	0.40	\$239.40
10/31/2022	E-mails to/from M. Conlan re: further revisions to opposition to Youngs' charities motion.	B62	02548	DC	0.10	\$59.85
10/31/2022	E-mail to E. Rosen re: opposition to Youngs' Charity Motion.	B62	02548	DC	0.10	\$59.85
10/31/2022	Prepare Receiver's Opposition to Youngs' Renewed Charities Motion for electronic filing (0.1); file and serve same (0.1); review and receipt of same (0.1); coordinate email and mail service of same; email with team re: same (0.1).	B62	26059	ER	0.40	\$109.80
10/31/2022	Corporate searches for Island Bums LLC (0.1); confer and email with M. Conlan re: same (0.1).	B62	26059	ER	0.20	\$54.90
11/01/2022	Email from yacht broker re: status of M/V Currenseas.	B62	02518	DEB	0.20	\$119.70
11/01/2022	Revise letter to J. Deckenbach re: M. Stewart's compliance with discovery (0.5); Confer with M. Conlan re: same (0.2).	B62	02518	DEB	0.70	\$418.95

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
11/01/2022	Emails re: titles to vehicles and vessel.	B62	02518	DEB	0.20	\$119.70
11/01/2022	Emails with accountants discussing financials of Broker defendant.	B62	30541	MAC	0.20	\$81.90
11/01/2022	Finalize response letter to J. Deckenbach (0.2); e-mails with D. Barney re: same (0.1).	B62	02062	MC2	0.30	\$179.55
11/01/2022	Review and receipt of proof of service of broker defendant (0.1); update broker tracking spreadsheet (0.1); docket response deadline; email with process server re: same (0.1).	B62	26059	ER	0.30	\$82.35
11/01/2022	Monitor docket for Stewart compliance with Contempt Order.	B62	26059	ER	0.10	\$27.45
11/01/2022	Email with team re: motor vehicle information (0.1); research re: same (0.1).	B62	26059	ER	0.20	\$54.90
11/02/2022	Emails regarding international service of Broker complaint.	B62	30541	MAC	0.20	\$81.90
11/02/2022	Attend to e-mails with D. Crapo and M. Conforti re: service on K8EDW.	B62	02062	MC2	0.10	\$59.85
11/02/2022	Skim index to SEC document production; e-mails with team re: review of same.	B62	02062	MC2	0.10	\$59.85
11/02/2022	E-mails to/from E. Rosen re: service of process on K8EDW in the UK.	B62	02548	DC	0.20	\$119.70
11/02/2022	E-mails to/from M. Conlan and E. Rosen re: electrical bills at the 1197 Lloyds Road Property and the SEC document production.	B62	02548	DC	0.30	\$179.55
11/02/2022	Confer with M. Conlan re: review of SEC document production.	B62	02548	DC	0.10	\$59.85
11/02/2022	Confer and email with Express Process re: international service to England (0.2); email and confer with team re: same (0.2).	B62	26059	ER	0.40	\$109.80
11/02/2022	Detailed email with team re: document production logistics (0.2); review index re: same (0.1).	B62	26059	ER	0.30	\$82.35
11/03/2022	Confer with M. Conlan, D. Crapo and M. Conforti re: Open litigation items.	B62	02518	DEB	0.80	\$478.80
11/03/2022	Telephone with M. Conlan and D. Porteous re: claims against Equiti.	B62	02518	DEB	0.70	\$418.95
11/03/2022	Confer with M. Conlan and D. Crapo re: claims against Equiti.	B62	02518	DEB	0.30	\$179.55
11/03/2022	Telephone with M. Conlan and J. Deckenbach re: Title to vehicles and M/V Currenseas.	B62	02518	DEB	0.30	\$179.55
11/03/2022	Conferred with M. Conlan, D. Crapo, and D. Barney to strategize remaining receivership tasks.	B62	30541	MAC	0.80	\$327.60
11/03/2022	Conferred with D. Crapo regarding Broker Complaint.	B62	30541	MAC	0.10	\$40.95
11/03/2022	Conferred with E. Rosen regarding Broker Complaint.	B62	30541	MAC	0.40	\$163.80
11/03/2022	Working session with D. Barney, D. Crapo and M. Conforti re: avoidance actions, service of foreign defendants, SEC document production and Equiti analysis.	B62	02062	MC2	0.80	\$478.80
11/03/2022	Telephone calls with E. Rosen re: SEC document production and October prebill.	B62	02062	MC2	0.10	\$59.85
11/03/2022	Conference call with J. Deckenbach and D. Barney re: follow-up on Stewart compliance issues.	B62	02062	MC2	0.30	\$179.55
11/03/2022	Meet with M. Conlan, D. Barney and M. Conforti re: status of and next steps with respect to avoidance actions and Equiti document production.	B62	02548	DC	0.80	\$478.80
11/03/2022	E-mail to broker defendant re: receiver's claim against her.	B62	02548	DC	0.10	\$59.85
11/03/2022	Confer with M. Conlan and D. Barney re: review of Equiti document production.	B62	02548	DC	0.50	\$299.25
11/03/2022	E-mails to/from Aaron Lukken of Viking Advocates and M. Conforti re: service of Alternative Management and K8EDW in the UK.	B62	02548	DC	0.30	\$179.55
11/03/2022	E-mails to/from M. Conlan re: service of process in the UK.	B62	02548	DC	0.10	\$59.85
11/03/2022	Review and receipt of Stewart Asset Freeze Violator letters with documentation of delivery (0.2); update chart re: same (0.1).	B62	26059	ER	0.30	\$82.35
11/03/2022	Assistance to E. Rosen regarding delivery of Excel spreadsheet required in matter for review.	B62	89266	DW	0.20	\$41.40
11/04/2022	Review title documents to M/V Currenseas and emails to/from M. Conlan re: same.	B62	02518	DEB	0.40	\$239.40
11/04/2022	Review letter from J. Deckenbach re: further information on vehicle and vessel titles and review same.	B62	02518	DEB	0.30	\$179.55
11/04/2022	Telephone with M. Conlan re: status report to court and insurance on vehicles and vessels.	B62	02518	DEB	0.30	\$179.55
11/04/2022	Revise status report to court.	B62	02518	DEB	0.50	\$299.25
11/04/2022	Drafted Request for Entry of Default papers regarding Broker Defendant in Broker action.	B62	30541	MAC	1.30	\$532.35
11/04/2022	Review prior correspondence with J. Deckenbach (0.7); review contempt motion and applicable orders(0.7); draft status report to court (0.7).	B62	02062	MC2	2.10	\$1,256.85
11/04/2022	E-mails with D. Barney and N. Mitchell re: filing and service of Stewart status report.	B62	02062	MC2	0.10	\$59.85
11/04/2022	Review e-mail from net winner re: due diligence for settlement of receiver's claim.	B62	02548	DC	0.10	\$59.85
11/04/2022	Begin review of documents produced by Equiti.	B62	02548	DC	6.70	\$4,009.95
11/04/2022	EFile and serve Status Report re: Contempt Order per M. Conlan.	B62	26048	NM3	0.50	\$103.50
11/07/2022	E-mails with E. Rosen re: service of Stewart Contempt Motion Status Report.	B62	02062	MC2	0.20	\$119.70
11/07/2022	Telephone call with E. Rosen re: service of Stewart Contempt Motion Status Report.	B62	02062	MC2	0.10	\$59.85

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
11/07/2022	Telephone call with T. Ashmore re: status of Stewart Contempt Motion.	B62	02062	MC2	0.30	\$179.55
11/07/2022	E-mails to from "net winner" counsel, Bryan Harrison, re: settlement,	B62	02548	DC	0.20	\$119.70
11/07/2022	Review and receipt of documentation of certain settled claims against net winners (0.2); update chart re: same (0.2); email with M. Conforti re: same (0.1).	B62	26059	ER	0.50	\$137.25
11/07/2022	Confer with team re: returned demand letters (0.1); review and receipt of same (0.2); detailed email with D. Crapo re: same (0.1).	B62	26059	ER	0.40	\$109.80
11/07/2022	Email and confer with team re: service of Status Report re: Michael Stewart non-compliance with Contempt Order (0.1); coordinate email service (0.1); draft Amended Certificate of Service (0.2); prepare same for electronic filing; file and serve same; review and receipt of as-filed version of same (0.1).	B62	26059	ER	0.50	\$137.25
11/08/2022	Confer with M. Conlan and J. Deckenbach re: open items on vehicles and vessels from M. Stewart.	B62	02518	DEB	0.60	\$359.10
11/08/2022	Telephone with Land Rover N. Scottsdale re: sale of used vehicles and email to J. Deckenbach re: same.	B62	02518	DEB	0.30	\$179.55
11/08/2022	Attention to default judgment of Broker defendant.	B62	30541	MAC	0.20	\$81.90
11/08/2022	Conferred with E Rosen regarding default judgment of broker defendant.	B62	30541	MAC	0.10	\$40.95
11/08/2022	Review Request for Entry of Default against Phenom Ventures.	B62	02062	MC2	0.10	\$59.85
11/08/2022	Telephone call and e-mails with E. Rosen re: fees related to Stewart Order to Show Cause and contempt motion.	B62	02062	MC2	0.10	\$59.85
11/08/2022	Review returned demand letters to James Roche, Michael Stewart, Victoria Stewart, Aaron Stewart and Kathleen Stewart.	B62	02548	DC	0.10	\$59.85
11/08/2022	E-mail to B, Harrison, counsel to net winner, re: settlement of Receiver's claim.	B62	02548	DC	0.10	\$59.85
11/08/2022	Confer with charity counsel, Y. Maldonado, re: Receiver's claim against charity.	B62	02548	DC	0.20	\$119.70
11/08/2022	Review and analyze time for 2nd and 3rd Quarters 2022 plus to calculate estimated hours and fees for work on Show Cause Motion, Contempt Motion, and related filings (1.8); review time for 4th Quarter Oct 2022 regarding same (0.7); confer and emails with team re: same (0.2).	B62	26059	ER	2.70	\$741.15
11/09/2022	Emails with Broker Defendant regarding settlement.	B62	30541	MAC	0.40	\$163.80
11/09/2022	Draft settlement agreement for Broker Defendant.	B62	30541	MAC	0.60	\$245.70
11/09/2022	Emails with Broker Defendant's counsel regarding settlement.	B62	30541	MAC	0.20	\$81.90
11/09/2022	Review Broker Defendant's response to avoidance demands.	B62	30541	MAC	0.60	\$245.70
11/09/2022	Call with Broker Defendant's counsel to discuss commissions.	B62	30541	MAC	0.20	\$81.90
11/09/2022	Internal emails regarding Broker Defendant's commissions analysis.	B62	30541	MAC	0.30	\$122.85
11/09/2022	Reviewed documents produced by SEC, for purposes of Broker-Defendant Complaint.	B62	30541	MAC	0.20	\$81.90
11/09/2022	Telephone call with M. Conforti re: analysis of Mercury Fund avoidance response.	B62	02062	MC2	0.20	\$119.70
11/09/2022	Review e-mails between M. Conforti re: and broker representative re: settlement of Receiver's claim.	B62	02548	DC	0.20	\$119.70
11/09/2022	Participate in conference with M. Conforti and broker defendant's counsel, Bryan Harrison, re: settlement of Receiver's claim.	B62	02548	DC	0.20	\$119.70
11/09/2022	Review and consider e-mail from broker counsel, Mr. Harrison, re: client documents.	B62	02548	DC	0.10	\$59.85
11/09/2022	E-mails to/from M. Conforti and M. Conlan re: broker's lost documents.	B62	02548	DC	0.20	\$119.70
11/09/2022	Email with process server re: continuing service attempts upon West Chicago broker defendant.	B62	26059	ER	0.10	\$27.45
11/09/2022	Prepare Phenom Ventures Request for Entry of Default for electronic filing (0.1); file and serve same (0.1); review and receipt of as-filed version; email with team re: same (0.1).	B62	26059	ER	0.30	\$82.35
11/10/2022	Emails to/from J. Deckenbach re: Stewart vehicles.	B62	02518	DEB	0.30	\$179.55
11/10/2022	Emails with Broker Defendant's counsel regarding settlement topics.	B62	30541	MAC	0.10	\$40.95
11/10/2022	Attend to e-mails with M. Conforti re: Mercury Alternative Fund.	B62	02062	MC2	0.10	\$59.85
11/10/2022	Review e-mails between M. Conforti and broker counsel, Bryan Harrison, re: settlement of Receiver's claim.	B62	02548	DC	0.10	\$59.85
11/10/2022	Email with process server re: status of renewed service attempts upon West Chicago broker defendant (0.1); confer with process server re: same (0.1).	B62	26059	ER	0.20	\$54.90
11/14/2022	Research re: vehicle values.	B62	02518	DEB	0.80	\$478.80
11/14/2022	Draft papers for amended complaint regarding Broker Complaint.	B62	30541	MAC	1.00	\$409.50
11/14/2022	E-mails to/from Aaron Lukken of Viking Advocates re: service on Alternative Management, Ltd.	B62	02548	DC	0.20	\$119.70
11/14/2022	E-mails to/from M. Conforti re: service of process on Alternative Management Ltd.	B62	02548	DC	0.40	\$239.40
11/14/2022	Review e-mail from M. Conlan re: service of process on Alternative Management, Ltd.	B62	02548	DC	0.10	\$59.85

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
11/14/2022	Review Michael and Maria Stewart's extension motion of time to reply to Receiver's opposition to renewed charities motion.	B62	02548	DC	0.10	\$59.85
11/14/2022	Review amended complaint against brokers and notice of amendment.	B62	02548	DC	0.10	\$59.85
11/15/2022	Research re: vehicle and vessel values and titles.	B62	02518	DEB	0.70	\$418.95
11/15/2022	Emails regarding settlement with Broker Defendant.	B62	30541	MAC	0.10	\$40.95
11/15/2022	Attention to Amended Complaint documents and service of same.	B62	30541	MAC	0.30	\$122.85
11/15/2022	Review SEC's documents regarding agreements related to Broker Defendants.	B62	30541	MAC	0.30	\$122.85
11/15/2022	Continue review of documents produced by Equiti.	B62	02548	DC	3.60	\$2,154.60
11/15/2022	Review and respond to e-mail from M. Conforti re: broker defendant Settlement.	B62	02548	DC	0.10	\$59.85
11/15/2022	Confer with E. Rosen re: amended broker complaint.	B62	02548	DC	0.10	\$59.85
11/15/2022	Prepare Notice of Amended Complaint, Amended Complaint, and Summons for electronic filing (1.2); file and serve same (0.4); conferrals with team re: same (0.2).	B62	26059	ER	1.80	\$494.10
11/16/2022	Confer with M Conlan and SEC regarding settlement with Broker Defendant.	B62	30541	MAC	0.20	\$81.90
11/16/2022	Emails with Broker Defendant finalizing settlement.	B62	30541	MAC	0.10	\$40.95
11/16/2022	Draft settlement agreement for review and comment of Broker Defendant.	B62	30541	MAC	0.40	\$163.80
11/16/2022	Telephone call with SEC Counsel re: settlement with New Zealand defendants.	B62	02062	MC2	0.30	\$179.55
11/16/2022	Review e-mails between M. Conforti and net winners re: settlements.	B62	02548	DC	0.10	\$59.85
11/16/2022	E-mails to/from M. Conforti and E. Rosen re: Receiver's claim against broker.	B62	02548	DC	0.10	\$59.85
11/16/2022	Review agreement between Mediatrix and Mercury Alternative Fund.	B62	02548	DC	0.10	\$59.85
11/17/2022	Confer with M. Conlan and J. Deckenbach re: titles to vehicles and vessels and disposition of same.	B62	02518	DEB	0.50	\$299.25
11/17/2022	Confer with E Rosen regarding the amended Broker Complaint.	B62	30541	MAC	0.20	\$81.90
11/17/2022	Review financial information provided by defendant.	B62	02548	DC	2.60	\$1,556.10
11/17/2022	Continue review of documents Equiti produced.	B62	02548	DC	0.60	\$359.10
11/17/2022	Email with process server and team re: successful attempt to serve broker defendant.	B62	26059	ER	0.10	\$27.45
11/18/2022	Research replacing lost vehicle title in Bahamas (0.3); email to J. Deckenbach re: same (0.1).	B62	02518	DEB	0.40	\$239.40
11/18/2022	Emails with Broker Defendant's counsel regarding settlement discussions.	B62	30541	MAC	0.10	\$40.95
11/18/2022	Review and receipt of issued summons; email with team re: same.	B62	26059	ER	0.10	\$27.45
11/21/2022	Emails finalizing settlement with Broker Defendant.	B62	30541	MAC	0.20	\$81.90
11/21/2022	Emails regarding stipulation of dismissal as to a Broker Defendant.	B62	30541	MAC	0.20	\$81.90
11/21/2022	Review and sign settlement stipulation with broker defendant (0.1); telephone call and e-mails with M. Conforti re: same (0.1).	B62	02062	MC2	0.20	\$119.70
11/21/2022	E-mails to/from E. Rosen re: service on K8EDW.	B62	02548	DC	0.10	\$59.85
11/21/2022	Docket deadline for broker defendant to answer.	B62	26059	ER	0.10	\$27.45
11/22/2022	Emails with RMA regarding settlements.	B62	30541	MAC	0.10	\$40.95
11/22/2022	Confer with E Rosen regarding settlements received to date.	B62	30541	MAC	0.10	\$40.95
11/22/2022	Emails with Broker Defendant regarding settlement.	B62	30541	MAC	0.10	\$40.95
11/22/2022	Emails regarding Net Winners generally.	B62	30541	MAC	0.10	\$40.95
11/22/2022	E-mails to/from M. Conforti re: resolution of net winner actions.	B62	02548	DC	0.10	\$59.85
11/22/2022	E-mail to broker defendant re: Receiver's claim.	B62	02548	DC	0.10	\$59.85
11/22/2022	Review e-mails between M. Conforti and broker defendant re: settlement of Receiver's claim.	B62	02548	DC	0.10	\$59.85
11/22/2022	Review e-mails from D. Barney and between D. Barney and M. Conlan re: response to Michael and Maria Stewart's charities motion.	B62	02548	DC	0.20	\$119.70
11/22/2022	E-mail to net winner re: Receiver's claims.	B62	02548	DC	0.10	\$59.85
11/22/2022	Prepare dismissal for electronic filing (0.1); file and serve same; review and receipt of as-filed version; email with team re: same (0.1).	B62	26059	ER	0.20	\$54.90
11/22/2022	Review and organize settlement documentation (0.2); update tracking charts re: same (0.4); email with team re: same (0.1).	B62	26059	ER	0.70	\$192.15
11/22/2022	Email with process server re: proof of service for broker defendant.	B62	26059	ER	0.10	\$27.45
11/24/2022	Attend to e-mails with D. Crapo and A. Lukken re: Application to Strike-Off filed by Alternative Asset Management in England (0.4); telephone call with Companies House in England, review complaint (0.3), prepare and file objection to Application to Strike-Off (0.3).	B62	02062	MC2	1.00	\$598.50

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
11/24/2022	E-mails to/from M. Conlan and UK service of process expert, Aaron Lukken, re: potential dissolution of Alternative Management.	B62	02548	DC	0.20	\$119.70
11/25/2022	E-mails to/from net winner re: Receiver's claims.	B62	02548	DC	0.10	\$59.85
11/28/2022	Email with process server re: proof of service for broker defendant (0.1); review and receipt of proof of service; email with team re: same (0.1).	B62	26059	ER	0.20	\$54.90
11/29/2022	Follow up on settlement payment by charity.	B62	02548	DC	0.40	\$239.40
11/30/2022	Review Broker Defendant's document productions.	B62	30541	MAC	0.30	\$122.85
11/30/2022	Drafting motion for default judgment for sum certain papers against Broker Defendant.	B62	30541	MAC	1.00	\$409.50
11/30/2022	Review and analyze documents provided by counsel for Mercury Alternative Fund in defense to broker complaint.	B62	02062	MC2	0.30	\$179.55
11/30/2022	Telephone calls with M. Conforti re: response to Mercury Alternative Fund.	B62	02062	MC2	0.10	\$59.85
11/30/2022	Review M. Conforti's correspondence with parties to settlement agreements re: Receiver's claims.	B62	02548	DC	0.10	\$59.85
12/01/2022	Emails with Broker Defendants' counsel.	B62	30541	MAC	0.20	\$81.90
12/01/2022	E-mails to/from M. Conforti re: resolution of Receiver's claim against Mercury Alternative.	B62	02548	DC	0.10	\$59.85
12/01/2022	E-mails to/from M. Conforti and from broker counsel, Byron Browne, re: settlement of Receiver's claim against broker.	B62	02548	DC	0.10	\$59.85
12/02/2022	Emails to/from M. Conlan and B. Strawbridge re: case status.	B62	02518	DEB	0.50	\$299.25
12/02/2022	Emails with Net Winner regarding settlement.	B62	30541	MAC	0.40	\$163.80
12/02/2022	Call with Broker Defendant's counsel.	B62	30541	MAC	0.20	\$81.90
12/02/2022	Review e-mails to/from M. Conforti and between M. Conforti and broker counsel, B. Browne, re: settlement of Receiver's claim against broker.	B62	02548	DC	0.20	\$119.70
12/02/2022	Participate in conference call with broker counsel, B. Brown, re: resolution of Receiver's claim against broker.	B62	02548	DC	0.20	\$119.70
12/02/2022	Review and respond to e-mail from net winner re: Receiver's claim.	B62	02548	DC	0.20	\$119.70
12/05/2022	Emails to/from M. Conlan, B. Strawbridge and B. Sly re: case status.	B62	02518	DEB	0.50	\$299.25
12/05/2022	Conference with M. Conlan, D. Porteous and M. MacPhail re: Faegre retention for receiver's claims against prime broker.	B62	02518	DEB	1.40	\$837.90
12/05/2022	Emails regarding Broker Defendant settlement payments.	B62	30541	MAC	0.10	\$40.95
12/05/2022	Attention to Broker Defendant's strike-off application in UK.	B62	30541	MAC	0.40	\$163.80
12/05/2022	Call with Broker Defendant's counsel.	B62	30541	MAC	0.20	\$81.90
12/05/2022	Review e-mail correspondence from UK Companies House; draft follow-up e-mail to E. Rosen and M. Conforti re: objection to dissolution of Alternative Asset Management.	B62	02062	MC2	0.10	\$59.85
12/05/2022	Review correspondence from D. Crapo re: charity settlement; e-mails with D. Crapo re: same.	B62	02062	MC2	0.10	\$59.85
12/05/2022	Attend to settlement with MMGMS charity.	B62	02548	DC	0.30	\$179.55
12/05/2022	E-mails to/from MMGMS counsel, Thomas Hogan, re: settlement check.	B62	02548	DC	0.10	\$59.85
12/05/2022	Participate in conference call with D. Porteous re: potential claims against prime broker.	B62	02548	DC	1.00	\$598.50
12/05/2022	Participate in conference call with M. Conforti and B. Harrison, broker counsel, re: settlement.	B62	02548	DC	0.20	\$119.70
12/05/2022	E-mails to/from M. Conforti and UK Service of Process attorney, A. Lukken, re: service on international brokers.	B62	02548	DC	0.20	\$119.70
12/05/2022	Review and receipt of broker defendant settlement agreement and payment (0.1); docket deadline for Affiliated Asset Mgmt strikeoff (0.1).	B62	26059	ER	0.20	\$54.90
12/07/2022	Emails to/from J. Deckenbach and M. Conlan re: vehicles and M/V Currenseas.	B62	02518	DEB	0.50	\$299.25
12/07/2022	E-mails with M. Conforti re: net winner litigation.	B62	02062	MC2	0.10	\$59.85
12/07/2022	E-mails to/from broker counsel, B Browne, and M. Conforti re: settlement of Receiver's claim.	B62	02548	DC	0.10	\$59.85
12/08/2022	Emails to/from J. Cunningham and B. Strawbridge re: case status.	B62	02518	DEB	0.20	\$119.70
12/08/2022	E-mails to/from Equiti's counsel, S. Senderowitz, re: document review and Receiver's claim.	B62	02548	DC	0.20	\$119.70
12/08/2022	E-mails to/from M. Conforti re: resolution of Receiver's claims against "net winner" and a "broker."	B62	02548	DC	0.10	\$59.85
12/09/2022	Continue review of Equiti document production.	B62	02548	DC	3.60	\$2,154.60
12/12/2022	Reviewed Broker Defendant's documents produced to Receiver.	B62	30541	MAC	0.80	\$327.60
12/12/2022	Emails with Broker Defendant's counsel regarding documents produced to Receiver.	B62	30541	MAC	0.30	\$122.85
12/12/2022	Emails regarding Net Winner complaint strategy.	B62	30541	MAC	0.40	\$163.80
12/12/2022	Drafted Net Winner complaint.	B62	30541	MAC	2.00	\$819.00

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
12/12/2022	E-mails with D. Crapo re: charitable settlement.	B62	02062	MC2	0.10	\$59.85
12/12/2022	Review e-mail from T. Ashmore re: rescheduled criminal trial; review Order Setting Trial in criminal case (0.1); e-mails with E. Rosen re: same (0.1).	B62	02062	MC2	0.20	\$119.70
12/13/2022	E-mails with T. Ashmore and REDACTED re: extension of deadlines in civil case.	B62	02062	MC2	0.10	\$59.85
12/14/2022	Draft letter to counsel for charity re: settlement.	B62	02548	DC	0.20	\$119.70
12/16/2022	Review e-mails between Gibbons M. Conforti and counsel for "net winner," B. Harrison, re: resolution of Receiver's claim.	B62	02548	DC	0.10	\$59.85
12/19/2022	Emails to/from M. Conlan and D. Crapo re: claims against prime broker.	B62	02518	DEB	0.30	\$179.55
12/19/2022	Review e-mail from B. Harrison, broker counsel, re: settlement of Receiver's claim.	B62	02548	DC	0.10	\$59.85
12/19/2022	Review e-mails between M. Conforti and B. Harrison.	B62	02548	DC	0.10	\$59.85
12/20/2022	Emails to/from M. Conlan, J. Deckenbach and A. DiBenidetto re: status of M/V Currenseas.	B62	02518	DEB	0.40	\$239.40
12/20/2022	Emails with accountants discussing Broker Defendant's newly produced documents.	B62	30541	MAC	0.30	\$122.85
12/20/2022	Review correspondence between M. Conforti and B Harrison, broker counsel, and J. Curtis, Receivership Accountant re: resolution of Receiver's claim.	B62	02548	DC	0.20	\$119.70
12/20/2022	Continue review of Equiti document production.	B62	02548	DC	2.70	\$1,615.95
12/20/2022	Prepare Unopposed Motion to Employ Local Counsel for electronic filing (0.2); file and serve same (0.2); review and receipt of as-filed copies (0.2); coordinate email and mail service (0.1); confer and email with team re: same (0.2).	B62	26059	ER	0.90	\$247.05
12/21/2022	Confer with M. Conlan re: investment of held funds and claims process.	B62	02518	DEB	0.30	\$179.55
12/21/2022	E-mails to/from "net winner" counsel, B. Brown, re: resolution of Receiver's claim.	B62	02548	DC	0.10	\$59.85
12/22/2022	E-mails to/from "net winner" counsel, B. Brown, re: resolution of Receiver's claim.	B62	02548	DC	0.10	\$59.85
12/27/2022	Confer with counsel for Archdiocese of Philadelphia and St. Charles Borromeo re: settlement of Receiver's claim.	B62	02548	DC	0.20	\$119.70
12/28/2022	Draft tolling agreement counsel for Archdiocese of Philadelphia and St. Charles Borromeo.	B62	02548	DC	0.30	\$179.55
12/28/2022	E-mail to counsel for Archdiocese of Philadelphia and St. Charles Borromeo re: settlement.	B62	02548	DC	0.20	\$119.70
12/29/2022	Call counsel for Archdiocese of Philadelphia and St. Charles Borromeo re: tolling Agreement.	B62	02548	DC	0.10	\$59.85
12/30/2022	E-mail from Robert Welch, counsel for Archdiocese of Philadelphia and St. Charles Borromeo Seminary, re: tolling Agreement.	B62	02548	DC	0.10	\$59.85
	Sub-Total For Task:	B62	Litigation		188.40	\$92,865.75
10/05/2022	Telephone call with E. Rosen re: Q3 fee application.	B58	02062	MC2	0.10	\$59.85
10/06/2022	Telephone call with E. Rosen re: Q3 fee application.	B58	02062	MC2	0.10	\$59.85
10/11/2022	Review Court's (duplicate) Q2 2022 Fee Order; telephone call with E. Rosen re: same.	B58	02062	MC2	0.10	\$59.85
10/17/2022	E-mails with E. Rosen and P. Eiden re: fee application.	B58	02062	MC2	0.10	\$59.85
10/20/2022	Telephone calls with E. Rosen re: Mediatrix fee application	B58	02062	MC2	0.20	\$119.70
10/24/2022	Fee application preparation.	B58	02548	DC	0.20	\$119.70
10/24/2022	E-mails to/from E. Rosen re: fee application and K8EDW summons.	B58	02548	DC	0.20	\$119.70
10/25/2022	Draft 4th Quarterly Fee Application for 7/1 through 9/30/2022 (2.20); email with RMA re: same (0.1).	B58	26059	ER	2.30	\$631.35
10/26/2022	Telephone call with E. Rosen re: Q3 fee application.	B58	02062	MC2	0.10	\$59.85
10/26/2022	Draft portions of Receiver's 4th Quarterly Fee Application (0.2); email with J. Curtis re: RMA summary of same (0.1).	B58	26059	ER	0.30	\$82.35
10/28/2022	Draft portions of Receiver's 4th Quarterly Fee Application.	B58	26059	ER	1.50	\$411.75
10/30/2022	Draft portions of Receiver's 4th Quarterly Fee Application (0.1); Draft portions of M. Conlan Declaration in Support of 4th Quarterly Fee Application for the 3rd Quarter of 2022 (0.2); draft portions of D. Crapo Declaration in Support of 4th Quarterly Fee Application for the 3rd Quarter of 2022 (0.1); draft proposed order for same (0.2).	B58	26059	ER	0.60	\$164.70
10/31/2022	Review and revise Q3 2022 fee application, e-mails and telephone call with E. Rosen re: same.	B58	02062	MC2	1.20	\$718.20
10/31/2022	Final review and edit of Receiver's 4th Quarterly Fee Application; Conlan Declaration in Support; Crapo Declaration; and proposed order for same (0.5); detailed email to and confer with team re: same (0.2); prepare same for submission to SEC personnel; email to SEC re: same (0.5).	B58	26059	ER	1.20	\$329.40
11/07/2022	E-mails with SEC team re: Q3 2022 fee application.	B58	02062	MC2	0.10	\$59.85
11/07/2022	Confer and email with team re: SEC review of 3rd Quarter Fee Application.	B58	26059	ER	0.10	\$27.45
11/09/2022	Telephone call with E. Rosen re: Q3 fee application.	B58	02062	MC2	0.20	\$119.70

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
11/09/2022	Draft detailed e-mail to counsel and parties re: Q3 fee application.	B58	02062	MC2	0.10	\$59.85
11/09/2022	Prepare 4th Quarterly Fee Application for 3rd Quarter 2022 for electronic filing (0.1); confer with M. Conlan re: same (0.1).	B58	26059	ER	0.20	\$54.90
11/11/2022	E-mails with E. Rosen re: submission of Q3 2022 fee application; e-mails with V. Drohan re: same.	B58	02062	MC2	0.10	\$59.85
11/11/2022	E-mails to/from E. Rosen re: fee application.	B58	02548	DC	0.10	\$59.85
11/11/2022	Prepare Fourth Quarterly Fee Application for Third Quarter 2022 for electronic filing (0.2); file and serve same (0.2); review and receipt of as-filed versions of same (0.1); coordinate mail and email service of same (0.2); email with team re: same (0.2).	B58	26059	ER	0.90	\$247.05
12/02/2022	Email with team re: pending 3rd Quarter Fee Application.	B58	26059	ER	0.10	\$27.45
	Sub-Total For Task:	B58			10.10	\$3,712.05
12/05/2022	Telephone call with D. Barney re: retention of contingency counsel.	B56	02062	MC2	0.10	\$59.85
12/12/2022	E-mails with Seattle local counsel and SEC team re: retention of local counsel.	B56	02062	MC2	0.20	\$119.70
12/12/2022	Attend to e-mails with telephone calls with M. Conforti re: retention of local counsel in Seattle.	B56	02062	MC2	0.20	\$119.70
12/13/2022	E-mails with SEC counsel and M. Conforti re: retention of local counsel.	B56	02062	MC2	0.10	\$59.85
12/15/2022	Legal research re: motion to retain local counsel related to Net Winner complaint.	B56	30541	MAC	1.00	\$409.50
12/15/2022	Draft motion for retention of local counsel on Net Winner claim.	B56	30541	MAC	2.00	\$819.00
12/16/2022	E-mails with defense counsel re: retention of local counsel in Seattle.	B56	02062	MC2	0.20	\$119.70
12/19/2022	Continue drafting motion to employ local counsel.	B56	30541	MAC	1.10	\$450.45
12/19/2022	Review and revise Corr Cronin retention application.	B56	02062	MC2	0.40	\$239.40
12/19/2022	Attend to e-mails with M. Conforti and V. Stewart re: local counsel retention in Seattle.	B56	02062	MC2	0.10	\$59.85
12/20/2022	Edits and revisions to motion to employ local counsel.	B56	30541	MAC	0.50	\$204.75
	Sub-Total For Task:	B56			5.90	\$2,661.75
10/06/2022	Attend to e-mails from H. Sanders and D. Crapo re: claims process.	B54	02062	MC2	0.10	\$59.85
10/06/2022	Review e-mail re: FX Strategy Master Fund re: the Fund's potential claim.	B54	02548	DC	0.10	\$59.85
11/03/2022	Conference call with D. Barney and D. Porteous re: analysis of Equiti claims.	B54	02062	MC2	0.70	\$418.95
11/03/2022	Confer with D. Crapo and D. Barney re: analysis of Equiti claims.	B54	02062	MC2	0.30	\$179.55
11/15/2022	Review court notices.	B54	02548	DC	0.10	\$59.85
11/22/2022	E-mail to Matthew Gray re: Receiver's claim.	B54	02548	DC	0.10	\$59.85
12/02/2022	E-mails with D. Porteous re: estate claims against prime broker.	B54	02062	MC2	0.10	\$59.85
12/02/2022	E-mails with D. Barney re: analysis of potential claims against prime broker.	B54	02062	MC2	0.10	\$59.85
12/05/2022	Prepare for call with Drinker team on potential prime broker claims (0.2); telephone call with D. Barney and D. Crapo re: same (0.2).	B54	02062	MC2	0.40	\$239.40
12/05/2022	Conference call with D. Porteous, D. Crapo and D. Barney re: analysis of third-party claims.	B54	02062	MC2	1.20	\$718.20
12/19/2022	Review e-mails from E. Rosen and investor re: claims process.	B54	02062	MC2	0.10	\$59.85
12/19/2022	E-mails with D. Crapo and D. Barney re: prime broker claims.	B54	02062	MC2	0.20	\$119.70
	Sub-Total For Task:	B54			3.50	\$2,094.75
10/03/2022	Review court notices.	B53	02548	DC	0.10	\$59.85
10/27/2022	Status call with T. Ashmore.	B53	02062	MC2	0.20	\$119.70
10/27/2022	Telephone call with SEC Counsel re: case status.	B53	02062	MC2	0.20	\$119.70
10/27/2022	E-mails with SEC Counsel, E. Rosen and D. Crapo re: case status.	B53	02062	MC2	0.10	\$59.85
12/12/2022	MEDIATRIX Update Criminal Trial dates (0.1); update Receivership deadlines (0.1)	B53	26059	ER	0.20	\$54.90
12/21/2022	E-mails with SEC team re: agenda items.	B53	02062	MC2	0.10	\$59.85
12/21/2022	Confer with R. Malone re: investment structure.	B53	02062	MC2	0.20	\$119.70
	Sub-Total For Task:	B53			1.10	\$593.55
10/05/2022	Post Order Granting Receiver and Professionals 2nd Quarter Fee Application to mediatrixreceivership.com website.	B52	26059	ER	0.20	\$54.90

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
10/10/2022	Detailed email with team re: potential creditor inquiry.	B52	26059	ER	0.20	\$54.90
10/11/2022	Review letter from Wells Fargo re: frozen bank accounts; e-mails with E. Rosen re: same.	B52	02062	MC2	0.10	\$59.85
10/13/2022	Review and receipt of correspondence and documents from investor entity (0.1); email with team re: same (0.1).	B52	26059	ER	0.20	\$54.90
10/18/2022	Review and respond to e-mails from J. Curtis of Rocky Mountain re: Equiti payment to Receiver.	B52	02548	DC	0.10	\$59.85
10/21/2022	Review and respond to e-mail from M. Conlan re: privacy issue.	B52	02548	DC	0.10	\$59.85
10/31/2022	E-mails with D. Barney and J. Deckenbach re: marina storage fees.	B52	02062	MC2	0.10	\$59.85
10/31/2022	Post recent filing on website.	B52	26059	ER	0.10	\$27.45
11/02/2022	E-mails with counsel to investors re: status of claims.	B52	02062	MC2	0.10	\$59.85
11/02/2022	Email and confer with M. Conlan re: Coserv invoice [0.1]; detailed email with Coserv re: same [0.3].	B52	26059	ER	0.40	\$109.80
11/03/2022	Draft letter to R. Erekson of Rocky Mountain Advisors re: settlement with charity.	B52	02548	DC	0.20	\$119.70
11/07/2022	Email with Coserve and M. Conlan re: 1197 Lloyds utility bill records.	B52	26059	ER	0.10	\$27.45
11/09/2022	E-mails with J. Deckenbach and D. Barney re: auto insurance.	B52	02062	MC2	0.10	\$59.85
11/09/2022	E-mails with M. Conforti re: Mercury Fund fee contract.	B52	02062	MC2	0.10	\$59.85
11/16/2022	Add case news and recent filing to receivership website (mediatrixreceivershipcom).	B52	26059	ER	0.30	\$82.35
12/02/2022	Review docket in criminal case in preparation of response to investor.	B52	02062	MC2	0.30	\$179.55
12/02/2022	Review and draft reply to investor on case status (0.2); e-mails with D. Crapo re: same (0.1).	B52	02062	MC2	0.30	\$179.55
12/02/2022	E-mails with D. Barney re: response to investor inquiry.	B52	02062	MC2	0.10	\$59.85
12/02/2022	Review and respond to e-mail from M. Conlan re: investor's implicit request for a partial distribution on claims.	B52	02548	DC	0.20	\$119.70
12/02/2022	Review and receipt of investor correspondence.	B52	26059	ER	0.10	\$27.45
12/05/2022	Review remittance from broker defendant; cause same to be forwarded to RMA.	B52	02062	MC2	0.10	\$59.85
12/09/2022	Add Q3 2022 Fee Order to mediatrixreceivership.com website.	B52	26059	ER	0.10	\$27.45
12/13/2022	E-mails to/from M. Conlan re: payments by charities.	B52	02548	DC	0.10	\$59.85
12/15/2022	Confer with process server and email with R. Erekson re: protocol for formerly missing check.	B52	26059	ER	0.10	\$27.45
12/16/2022	Update mediatrixreceivership.com website.	B52	26059	ER	0.10	\$27.45
12/16/2022	Detailed email response to investor inquiry (0.3); fact research regarding same (0.3); detailed emails with team re: same (0.2).	B52	26059	ER	0.80	\$219.60
12/21/2022	Telephone call with J. Curtis re: interest rates and investment structure.	B52	02062	MC2	0.20	\$119.70
12/21/2022	Telephone call with REDACTED re: investment structure.	B52	02062	MC2	0.20	\$119.70
	Sub-Total For Task:	B52	Business Operations		5.10	\$2,177.55
10/07/2022	Review 1197 Lloyds Road closing documents.	B51	02548	DC	0.10	\$59.85
10/18/2022	Telephone calls with T. Ashmore and SEC personnel re: Wells Fargo safe deposit box.	B51	02062	MC2	0.50	\$299.25
10/18/2022	Attend to e-mails with Wells Fargo re: hold in safe deposit box.	B51	02062	MC2	0.10	\$59.85
10/25/2022	Emails to/from M. Conlan, J. Cunningham and A. Benidetto re: repair and brokerage listing of M/V Currenseas.	B51	02518	DEB	0.50	\$299.25
10/26/2022	Telephone call with D. Barney re: location of M/V Currencies.	B51	02062	MC2	0.10	\$59.85
10/27/2022	E-mails with D. Barney re: location of M/V Currencies.	B51	02062	MC2	0.10	\$59.85
10/28/2022	Teams call with D. Barney and SEC counsel re: letter from J. Deckenbach re: vehicles and coins.	B51	02062	MC2	0.60	\$359.10
10/28/2022	Telephone call to Denver AUSA Gillespie re: motor vehicle titles.	B51	02062	MC2	0.10	\$59.85
10/28/2022	Review correspondence from J. Deckenbach re: disposition of vehicles and gold coins.	B51	02062	MC2	0.10	\$59.85
10/28/2022	Telephone call with SEC Counsel re: Bahamian assets.	B51	02062	MC2	0.10	\$59.85
10/28/2022	Telephone call with J. Deckenbach re: Stewart vehicles and coins.	B51	02062	MC2	0.50	\$299.25
10/28/2022	Telephone call with D. Barney re: assets in the Bahamas.	B51	02062	MC2	0.30	\$179.55
10/31/2022	Telephone call with counsel for Mr. Stewart re: location of M/V Currencies.	B51	02062	MC2	0.10	\$59.85
	Sub-Total For Task:	B51	Sale Motion/363 Sales		3.20	\$1,915.20
10/03/2022	Review e-mails from M. Conlan and E. Rosen re: claims against charities.	B50	02548	DC	0.10	\$59.85

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Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
10/03/2022	Analyze net winner's position, including a review of correspondence and statutory and case law.	B50	02548	DC	1.70	\$1,017.45
10/03/2022	E-mail to net winner re: analysis of the information he provided in his defense.	B50	02548	DC	0.50	\$299.25
10/04/2022	Review and respond to e-mails re: claim of FX Strategy Master Fund Claim.	B50	02548	DC	0.30	\$179.55
10/05/2022	E-mails to/from E. Rosen re procedural issues.	B50	02548	DC	0.10	\$59.85
10/06/2022	E-mail to M. Conlan re: claims against charities.	B50	02548	DC	0.10	\$59.85
10/06/2022	Confer with M. Conlan re: claims against charities.	B50	02548	DC	0.10	\$59.85
10/06/2022	E-mail to SEC Mediatrix Team re: claims against charities.	B50	02548	DC	0.10	\$59.85
10/07/2022	E-mails to/from SEC Counsel and M. Conlan re: claims against charities.	B50	02548	DC	0.10	\$59.85
10/10/2022	Review information concerning FX Master Fund Claim in receivership.	B50	02548	DC	0.40	\$239.40
10/10/2022	E-mails to/from M. Conlan and E. Rosen re: FX Master Fund Claim.	B50	02548	DC	0.30	\$179.55
10/10/2022	Follow-up conference with M. Conlan.	B50	02548	DC	0.20	\$119.70
10/10/2022	E-mails to/from M. Conlan re: results of research.	B50	02548	DC	0.10	\$59.85
10/18/2022	Review pleadings and other documents related to the Equiti payment to the Receiver.	B50	02548	DC	0.50	\$299.25
10/19/2022	Confer with M. Conforti re: open avoidance claims.	B50	02548	DC	0.20	\$119.70
10/19/2022	Confer with M. Conlan re: Bryant Sewall's interest in the National Women's Football Conference.	B50	02548	DC	0.20	\$119.70
10/19/2022	Review information re: National Women's Football Conference.	B50	02548	DC	0.50	\$299.25
10/19/2022	E-mails to/from Sewall's counsel, Vivian Drohan, re: interest in the National Women's Football Conference.	B50	02548	DC	0.30	\$179.55
10/19/2022	Review avoidance demand letter to broker.	B50	02548	DC	0.10	\$59.85
10/19/2022	E-mail to Net Winner re: resolution of receiver's claim.	B50	02548	DC	0.20	\$119.70
10/20/2022	E-mails to/from counsel re: resolution of Receiver's claim against Mary Mother of God Mission Society.	B50	02548	DC	0.30	\$179.55
10/21/2022	Review court notice.	B50	02548	DC	0.10	\$59.85
10/26/2022	Investigate location of M/V Currenseas, (0.3); contact Nassau marinas and confer with M. Conlan re: same (0.3).	B50	02518	DEB	0.60	\$359.10
10/28/2022	Confer with Tyler Wood re: Receiver's claim.	B50	02548	DC	0.20	\$119.70
10/31/2022	Telephone call with D. Barney re: current location and storage charges for M/V Currencies.	B50	02062	MC2	0.20	\$119.70
10/31/2022	E-mails with E. Rosen re: due diligence on Island Bums, LLC (0.1); fact research re: same (0.1).	B50	02062	MC2	0.20	\$119.70
10/31/2022	E-mails with Stewarts' counsel re: recovery of motor vehicle titles and insurance on primary vehicles.	B50	02062	MC2	0.10	\$59.85
10/31/2022	E-mails to/from M. Conlan re: Michael Stewart's interest in T-Squared.	B50	02548	DC	0.10	\$59.85
10/31/2022	Review Michael Stewart's 2020 motion for release of assets from asset freeze and Order denying same.	B50	02548	DC	0.40	\$239.40
11/01/2022	Due diligence on Stewart Motor Vehicle searches.	B50	02062	MC2	0.50	\$299.25
11/01/2022	Conference with A. Sachs re: results of motor vehicle searches.	B50	02062	MC2	0.20	\$119.70
11/01/2022	Review and revise asset letter to Stewart's counsel.	B50	02062	MC2	0.10	\$59.85
11/01/2022	E-mails with library re: motor vehicle and boat title searches.	B50	02062	MC2	0.20	\$119.70
11/01/2022	Fact research on Stewart motor vehicle transfers (1.0); review and revise response letter to counsel re: same (0.6).	B50	02062	MC2	1.60	\$957.60
11/01/2022	Review Coast Guard registration report for M.V. Currencies (0.1); e-mails with SEC team re: same (0.1).	B50	02062	MC2	0.20	\$119.70
11/01/2022	Email with M. Conlan re: previous M. Stewart asset searches.	B50	26059	ER	0.10	\$27.45
11/02/2022	E-mails with V. Drohan re: formation documents for Island Bums LLC.	B50	02062	MC2	0.10	\$59.85
11/03/2022	Confer with M. Conforti re: next steps.	B50	02548	DC	0.10	\$59.85
11/03/2022	Outline next steps for Equiti document review.	B50	02548	DC	0.20	\$119.70
11/03/2022	Begin review of documents provided by broker.	B50	02548	DC	0.20	\$119.70
11/04/2022	E-mails with J. Deckenbach re: Stewart assets.	B50	02062	MC2	0.20	\$119.70
11/04/2022	Telephone call with D. Barney re: title and registration for M/V Currenseas.	B50	02062	MC2	0.20	\$119.70
11/08/2022	E-mails with J. Deckenbach re: open issues.	B50	02062	MC2	0.10	\$59.85
11/08/2022	Conference call with D. Barney and J. Deckenbach re: motor vehicle titles and boat.	B50	02062	MC2	0.60	\$359.10
11/08/2022	E-mail to M. Conlan re: same.	B50	02548	DC	0.10	\$59.85

Gibbons P.C.

Time Detail

Run Date: 2/2/2023

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
11/09/2022	E-mail to Defendant Bryant Sewall's attorney, Vivian Drohan, re: Mr. Sewall's interest in the World Women's Football League.	B50	02548	DC	0.10	\$59.85
11/14/2022	E-mails with D. Barney re: 2016 Jeep VIN.	B50	02062	MC2	0.10	\$59.85
11/14/2022	Review returned "asset freeze order violations" demand letters and consider next steps.	B50	02548	DC	1.00	\$598.50
11/15/2022	Review agreements between Mediatrix and Mercury Alternative.	B50	02548	DC	0.20	\$119.70
11/15/2022	E-mails to/from AZ colleague re: locating James Roche, II.	B50	02548	DC	0.20	\$119.70
11/17/2022	Review and analyze Receiver Appointment Order re: sale of motor vehicles and yacht.	B50	02062	MC2	0.30	\$179.55
11/17/2022	Telephone call with J. Deckenbach and D. Barney re: Bahamian assets, and 2016 Jeep and Land Rover.	B50	02062	MC2	0.50	\$299.25
11/17/2022	E-mails to/from M. Conforti re: National Women's Football Conference.	B50	02548	DC	0.50	\$299.25
11/18/2022	Review e-mails between M. Conforti and "net winners."	B50	02548	DC	0.20	\$119.70
11/23/2022	Review e-mail from O. Smith re: resolution of Receiver's net winner claim against his client.	B50	02548	DC	0.10	\$59.85
11/29/2022	E-mails to/from MMGMS's counsel, Thomas Hogan, re: same.	B50	02548	DC	0.20	\$119.70
11/30/2022	E-mails with J. Deckenbach and D. Barney re: replacement boat title and other missing title documents.	B50	02062	MC2	0.10	\$59.85
12/02/2022	E-mails to/from M. Conlan re: Defendant Michael Stewart's interest in Women's Football League.	B50	02548	DC	0.10	\$59.85
12/05/2022	E-mail and telephone call to and confer with Bryant Sewall's civil counsel, Vivian Drohan. re: Mr. Sewall's interest in Women's International Football League as an asset of the receivership estate.	B50	02548	DC	0.20	\$119.70
12/05/2022	E-mails to/from M. Conlan re: Mr. Sewall's interest in Women's International Football League as an asset of the receivership estate.	B50	02548	DC	0.10	\$59.85
12/05/2022	Follow up conference with M. Conlan.	B50	02548	DC	0.10	\$59.85
12/06/2022	E-mail from net winner, Pati Velcek and to/from M. Conforti re: receiver's claim.	B50	02548	DC	0.20	\$119.70
12/08/2022	Attend to e-mails with D. Barney and J. Deckenbach re: new boat title.	B50	02062	MC2	0.10	\$59.85
12/08/2022	E-mails to/from Y-Man counsel, Byron Browne, and M. Conforti re: settlement of Receiver's claim.	B50	02548	DC	0.20	\$119.70
12/09/2022	E-mails to/from counsel for charity re: payment of settlement.	B50	02548	DC	0.10	\$59.85
12/12/2022	Consider next steps re: Receiver's claims.	B50	02548	DC	0.20	\$119.70
12/19/2022	E-mails to/from M. Conlan and D. Barney re: potential claims against prime broker.	B50	02548	DC	0.20	\$119.70
12/20/2022	Attend to e-mails from yacht broker and D. Barney re: status of repairs.	B50	02062	MC2	0.10	\$59.85
12/27/2022	Determine status of and next steps for collecting avoidable transfers from charities and "net winners."	B50	02548	DC	0.20	\$119.70
12/28/2022	Review and receipt of charity tolling letter; update chart re: same.	B50	26059	ER	0.10	\$27.45
12/30/2022	Review and respond to e-mail from M. Conlan re: status of claims against charities.	B50	02548	DC	0.10	\$59.85
Sub-Total For Task: B50 Asset Analysis and Recovery					18.50	\$11,007.45

Total For Matter:	106202	Counsel to Mark Conlan in his capacity a	250.80	\$122,927.55
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Totals For Client:			250.80	\$122,927.55
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Gibbons P.C.

Time Summary
Run Date: 2/2/2023

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	24.20	\$598.50	\$14,483.70
02062	MC2	Conlan, Mark	Director	52.10	\$598.50	\$31,181.85
00168	PJU	Ulrich, Peter J.	Director	0.50	\$598.50	\$299.25
02548	DC	Crapo, David	Counsel	79.80	\$598.50	\$47,760.30
30541	MAC	Conforti, Michael A.	Associate	31.60	\$409.50	\$12,940.20
30611	KPM	McEvelly, Kyle P.	Associate	0.70	\$328.50	\$229.95
26059	ER	Rosen, Ellen	Case Manager	46.40	\$274.50	\$12,736.80
89266	DW	Whitford, Diane	Case Manager	12.10	\$207.00	\$2,504.70
26048	NM3	Mitchell, Neal	ParaLegal	1.90	\$207.00	\$393.30
40027	RT1	Traylor, Robin	Others	1.50	\$265.00	\$397.50
Totals:				250.80		\$122,927.55

Gibbons P.C.

Fee Application
Run Date: 2/2/2023

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	14.00	\$5,301.00
B70	Tax Issues	1.00	\$598.50
B62	Litigation	188.40	\$92,865.75
B58	Fee Applications	10.10	\$3,712.05
B56	Employment Applications	5.90	\$2,661.75
B54	Claims Administration and Objections	3.50	\$2,094.75
B53	Case Administration	1.10	\$593.55
B52	Business Operations	5.10	\$2,177.55
B51	Sale Motion/363 Sales	3.20	\$1,915.20
B50	Asset Analysis and Recovery	18.50	\$11,007.45
Totals:		250.80	\$122,927.55

Gibbons P.C.Fee Application
Run Date: 2/2/2023

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	2.40	\$1,436.40
	02548 Crapo, David	2.10	\$1,256.85
	26059 Rosen, Ellen	9.50	\$2,607.75
RE05	Status Reports	14.00	\$5,301.00
B70	<u>Tax Issues</u>		
	02062 Conlan, Mark	0.50	\$299.25
	00168 Ulrich, Peter J.	0.50	\$299.25
B70	Tax Issues	1.00	\$598.50
B62	<u>Litigation</u>		
	02518 Barney, Dale E.	23.10	\$13,825.35
	30541 Conforti, Michael A.	27.00	\$11,056.50
	02062 Conlan, Mark	31.50	\$18,852.75
	02548 Crapo, David	64.00	\$38,304.00
	30611 McEvilly, Kyle P.	0.70	\$229.95
	26048 Mitchell, Neal	1.90	\$393.30
	26059 Rosen, Ellen	26.60	\$7,301.70
	40027 Traylor, Robin	1.50	\$397.50
	89266 Whitford, Diane	12.10	\$2,504.70
B62	Litigation	188.40	\$92,865.75
B58	<u>Fee Applications</u>		
	02062 Conlan, Mark	2.40	\$1,436.40
	02548 Crapo, David	0.50	\$299.25
	26059 Rosen, Ellen	7.20	\$1,976.40
B58	Fee Applications	10.10	\$3,712.05
B56	<u>Employment Applications</u>		
	30541 Conforti, Michael A.	4.60	\$1,883.70
	02062 Conlan, Mark	1.30	\$778.05
B56	Employment Applications	5.90	\$2,661.75
B54	<u>Claims Administration and Objections</u>		
	02062 Conlan, Mark	3.20	\$1,915.20
	02548 Crapo, David	0.30	\$179.55
B54	Claims Administration and Objections	3.50	\$2,094.75
B53	<u>Case Administration</u>		
	02062 Conlan, Mark	0.80	\$478.80
	02548 Crapo, David	0.10	\$59.85
	26059 Rosen, Ellen	0.20	\$54.90
B53	Case Administration	1.10	\$593.55
B52	<u>Business Operations</u>		
	02062 Conlan, Mark	1.70	\$1,017.45
	02548 Crapo, David	0.70	\$418.95
	26059 Rosen, Ellen	2.70	\$741.15
B52	Business Operations	5.10	\$2,177.55
B51	<u>Sale Motion/363 Sales</u>		
	02518 Barney, Dale E.	0.50	\$299.25

Gibbons P.C.

Time Detail
Run Date: 2/2/2023

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

	02062	Conlan, Mark	2.60	\$1,556.10
	02548	Crapo, David	0.10	\$59.85
B51	Sale Motion/363 Sales		3.20	\$1,915.20
B50	Asset Analysis and Recovery			
	02518	Barney, Dale E.	0.60	\$359.10
	02062	Conlan, Mark	5.70	\$3,411.45
	02548	Crapo, David	12.00	\$7,182.00
	26059	Rosen, Ellen	0.20	\$54.90
B50	Asset Analysis and Recovery		18.50	\$11,007.45
Totals:			250.80	\$122,927.55

Gibbons P.C.Disbursement Detail
Run Date: 2/1/2023

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>		
12/05/2022	Expedited Delivery Service (Federal Express)	\$45.78
12/14/2022	Expedited Delivery Service (Federal Express)	\$38.69
	Total: Expedited Delivery Service (Federal Express)	\$84.47
<u>Disbursement Type:</u> <u>Filing and Miscellaneous Fees</u>		
06/14/2022	Filing and Miscellaneous Fees	\$402.00
08/31/2022	Filing and Miscellaneous Fees	\$402.00
08/26/2022	Filing and Miscellaneous Fees	\$960.00
09/09/2022	Filing and Miscellaneous Fees	\$9.08
10/05/2022	Filing and Miscellaneous Fees	\$223.00
10/04/2022	Filing and Miscellaneous Fees	\$402.00
10/19/2022	Filing and Miscellaneous Fees	\$9.48
10/19/2022	Filing and Miscellaneous Fees	\$9.08
10/19/2022	Filing and Miscellaneous Fees	\$3.98
10/03/2022	Filing and Miscellaneous Fees	\$402.00
10/05/2022	Filing and Miscellaneous Fees	-\$402.00
11/01/2022	Filing and Miscellaneous Fees	\$12.65
11/01/2022	Filing and Miscellaneous Fees	\$6.36
	Total: Filing and Miscellaneous Fees	\$2,439.63
<u>Disbursement Type:</u> <u>Service Fees</u>		
10/19/2022	Service Fees	\$2.00
	Total: Service Fees	\$2.00
Total Disbursements:		\$2,526.10

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

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

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

MEDIATRIX CAPITAL INC., *et al.*,

Defendants,

and

MEDIATRIX CAPITAL FUND LTD, *et al.*,

Relief Defendants.

**ORDER APPROVING AND AUTHORIZING PAYMENT OF
RECEIVER’S AND PROFESSIONALS’ FEES AND COSTS
FROM OCTOBER 1, 2022 THROUGH DECEMBER 31, 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 October 1, 2022 through December 31, 2022* [ECF No.399] (the “Fifth Quarterly Fee Application”). The Court having reviewed and considered the Fifth Quarterly Fee Application, and all pleadings and evidence filed in support thereof, and there being no opposition to the Fifth Quarterly Fee Application, and good cause appearing therefore, IT IS

ORDERED that:

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

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

a. The Receiver's fees in the amount of \$1,505.00 plus Receiver's costs of \$59.04 for a total of \$1,564.04; and

b. The Receiver's counsel, Gibbons P.C.'s fees of \$122,927.55 and Gibbons' costs of \$2,526.10 for a total of \$125,435.65; and

c. The Receiver's accountants, Rocky Mountain Advisory, LLC's, fees of \$5,996.00 and RMA's costs of \$54.43 for a total of \$6,050.43; and

d. The Original Receiver's counsel at Barnes & Thornburg LLP's, fees of \$478.40.

DATED this ____ day of _____, 2023.

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 Fifth Quarterly Fee Application.