

**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 JANUARY 1, 2023 THROUGH MARCH 31, 2023**

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 January 1, 2023 through the end of the quarter, March 31, 2023 (the "**Sixth 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 \$10,185.00 in connection with services described in detail below as well as on the Receiver's invoice attached as Exhibit A to the Declaration of Mark B. Conlan filed contemporaneously herewith (the "**Conlan Declaration**");

b) Receiver's counsel Gibbons P.C.'s ("**Gibbons**") fees of \$150,489.50 and Gibbons' costs of \$838.62, for a total of \$151,328.12 in connection with services described in detail below as well as on the Gibbons invoice attached as Exhibit A to the Declaration of David N. Crapo filed contemporaneously herewith (the "**Crapo Declaration**") and together with the Conlan Declaration (the "**Conlan and Crapo Declarations**");

c) Receiver's accountants, Rocky Mountain Advisory, LLC's ("**RMA**"), fees of \$9,449.50 and RMA's costs of \$59.67 for a total of \$9,509.17 in connection with services described in detail below as well as on RMA's invoice attached as Exhibit B to the Conlan Declaration; and

d) Receiver's litigation local counsel in Washington State, Corr Cronin LLP, ("**Corr Cronin**") fees of \$2,203.20 and Corr Cronin's costs of \$371.53 for a total of \$2,574.73 in connection with services described in detail below as well as on Corr Cronin's invoice attached as Exhibit C to the Conlan Declaration.

INTRODUCTION

This is the sixth Quarterly Fee Application pursuant to the Receiver Order, and covers the Sixth Expense Period, from January 1, 2023 through March 31, 2023. The Motion is based on the memorandum of points and authorities below, the Conlan and Crapo Declarations, upon the pleadings, records and files of the Court in this case of which the Receiver requests the Court to take judicial notice, including without limitation the *Report of Receiver's Activities from January*

1, 2023 through March 31, 2023 [ECF No. 396] (the “**Receiver’s Sixth 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 prior to filing the Motion. The Plaintiff has indicated that it has no objection to this Motion.

We have advised the following parties or their counsel of this Quarterly Fee Application in advance: the SEC; 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 SEC, counsel for Michael Stewart, and counsel for the Sewalls; Mediatrix Capital Inc., Blue Isle Markets Inc., and Blue Isle Markets Ltd. that their clients have

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

no objection to the Quarterly Fee Application. We have been advised by counsel for the Youngs that they do object to the Gibbons fee application only.

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; Business Operations; Fee Application; Asset Disposition; Status Reports; Claims; Tax Issues; Asset Analysis and Recovery; Litigation Consulting; Employment Applications; 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, as well as insurance brokers regarding insurance coverage, defendants in avoidance actions, and parties involved with real property assets, personal property assets, and other assets. The Receiver has also responded to investor inquiries during the Sixth Expense Period.

During the Sixth Expense Period, Receiver’s counsel prepared and filed the *Report of Receiver’s Activities from October 1, 2022 through December 31, 2022* [ECF No. 396] and *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 “**Q4 Fee Application**”). The Q4 Fee Application was approved by order dated March 14, 2023 [ECF 401].

The Receiver prepared and filed his *Unopposed Motion Authorizing Receiver for an Order Authorizing Receiver to Invest Receivership Funds* [ECF No. 397] (the “**Investment Motion**”) on January 27, 2023, which motion was granted by order entered on February 14, 2023 [ECF No. 398]. The Investment Motion was undertaken in order to take advantage of rising interest rates on

government issued debt securities. A significant amount of time was invested by the Receiver and his professionals during Q1 2023 in connection with negotiating the best terms with a number of potential banks and securities brokers, as well as negotiating and drafting the governing documents that were submitted to the Court in support of the Investment Motion. As a result of these efforts, the Receivership Estate earned \$295,617.42 in interest income during Q1 2023.

The Receiver also negotiated and recovered \$9,250 in previously charged bank fees during Q1 2023.

As of the 1st Quarter of 2023, Receiver's counsel negotiated, settled, and/or received funds in connection with 6 Brokers (two of which the receivership estate settled and received funds in full, two of which the receivership estate settled but has yet to receive funds, and two of which the receivership estate previously settled and received monthly payments). Receiver's counsel communicated with the Brokers to explore settlement where possible, abandon claims where the Brokers were judgment proof (after reviewing financial documents produced), and finalized four settlements within Q1 2023.

During the Sixth Expense Period, Receiver's counsel entered into two settlements with Net Winners (one of which began as a complaint in the State of Washington, and one of which was an international Net Winner). Receiver's counsel has also been monitoring monthly payments from a Net Winner previously settled.

The Receiver remained in communication or negotiations with several charitable entities to recover certain donations they received from Defendant Michael Young. Settlements with one additional charity was reached during Q1 2023 in the amount of \$9,000 and that settlement

payment has since been received. The Receiver's counsel is negotiating a settlement with one final charity.

To date the Receiver has negotiated and collected a total of \$710,475.83 in settlement payments in avoidance actions, of which \$65,901.69 was received during the Sixth Expense Period.

During the Sixth Expense Period, the Receiver continued to review a large document production in excess of 43,000 pages received in late 2022 from Equiti UK, Ltd. concerning its relationship and transactions with the entity defendants to assist in determining whether the Receivership Estate has any claims against Equiti UK, Ltd., and/or its affiliates.

Further, the Receiver has continued to identify and analyze data as well as perform legal research in support of other potential causes of action. The Receiver's counsel also followed up on demand letters to certain asset freeze violators and tolling letters to certain charitable entities. The Receiver and his counsel determined which asset violators to pursue. Updated addresses for asset violators have been obtained, and the Receiver intends to file an complaint(s) against the asset violators by May 15, 2023.

On October 31, 2022, both Plaintiff's counsel and Receiver's counsel filed opposition briefs [ECF Nos. 382; 383] to the *Young's Renewed Motion to Terminate Receiver's Collection Actions Against Religious Charities* [ECF No. 367] ("**Charities Motion**"), which was denied by order entered on March 23, 2023. [ECF No. 405]. During the Sixth Expense Period, Receiver's counsel also monitored and made preparations to respond to a Tenth Circuit appeal by defendant Michael Young and relief defendant Maria Young of this Court's denial of the Charities Motion, which appeal was later dismissed.

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. A complaint was filed by Local Counsel on January 18, 2023, and this complaint prompted the Net Winner to enter into a favorable settlement with the Receiver.

During the Sixth Expense Period, the Receiver's counsel negotiated the sale of a damaged 2014, 39' SeaVee motor vessel, the "M/V Currenseas," to Compass Solutions International Limited in The Bahamas. This sale was complicated by the fact that the title to the vessel was not originally in the name of any defendant or relief defendant, requiring multiple applications/submissions to the United States Coast Guard before a sale was possible.

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 Sixth Expense 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. During the Sixth Expense Period, the Receiver's professionals worked with the web designer on a Frequently Asked Questions ("FAQ") page to be added to the website.

SUMMARY OF SERVICES BY OTHER RECEIVER PROFESSIONALS

Rocky Mountain Advisory LLC

The majority of RMA's services provided during the Sixth Expense Period were related to Receivership operations and included but are not limited to the following: preparation of Quarterly Report for the 4th Quarter of 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; forensic investigation; assisting Receiver's counsel with evaluation of recovery claims, responses to defenses and settlements, seeking final judgment by default against two (2) brokers (which prompted one to settle); analysis of bank and financial documents, maintaining the Receivership Estate's books and records, as well as analysis of proposals from multiple banks and securities brokers for higher returns on deposited funds, and assisting with logistics for moving funds in order to achieve better investment yields. For additional detail, please see time entries on Exhibit B to the Conlan Declaration.

Corr Cronin LLP

The Receiver and his counsel communicated with Seattle local counsel for the purpose of pursuing a Net Winner avoidance action in Washington State Court. Local counsel was retained because the Net Winner failed to respond to any of the Receiver's communications concerning resolution of the Receiver's Claim. On January 18, 2023, Local Counsel filed a complaint that prompted the Net Winner to enter into a favorable settlement with the Receiver. 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 Sixth Expense Period, the Receiver and his professionals rendered reasonable, necessary and valuable services for the Receivership Estate that were beneficial to the Receivership Estate and the parties in interest. As demonstrated herein, including the supporting declarations and exhibits, the Receiver and his professionals have performed substantial and wide-ranging tasks that were beneficial to the Receivership Estate,

including directly bringing funds into the Receivership Estate so that these funds could not be diverted, misused or concealed, as well as taking possession and control of parcels of real property and laying the groundwork for the subsequent sale of that property for the benefit of the Receivership Estate. *See Federal Trade Comm'n v. Capital Acquisitions & Mgmt. Corp.*, 2005 U.S. Dist. LEXIS 18504 (N.D. Ill. August 26, 2005). The Receiver submits the fees are reasonable in light of the services rendered, and the fees and costs requested should be awarded in their entirety.

The Receiver has sufficient funds on hand to pay the fees and costs incurred through March 31, 2023 and requested in the Motion. Based on the cash on hand reported in the Receiver's Sixth Report, the Receivership Estate was holding \$24,070,522.02 net of accrued and unpaid fees and costs totaling \$173,597.02.

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 fees incurred by local counsel, Corr Cronin, as set forth herein, and enter the proposed order submitted concurrently herewith.

Respectfully submitted,

Dated: May 19, 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 May 19, 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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**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 JANUARY 1, 2023 THROUGH MARCH 31, 2023**

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 January 1, 2023 through March 31, 2023* (the "**Sixth 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 Sixth 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 \$10,185.00 for the Sixth Expense Period.

6. Attached hereto as Exhibit B is a true and correct copy of the Receiver's accountants, Rocky Mountain Advisory, LLC's, ("**RMA**") invoice for RMA's fees of \$9,509.17 and RMA's costs of \$59.67 for a total of \$9,568.84 for the Sixth Expense Period.

7. Attached hereto as Exhibit C is a true and correct copy of Washington Local Counsel, Corr Cronin LLP's ("**Corr Cronin**") invoice for Corr Cronin's fees of \$2,203.20 and Corr Cronin's costs of \$371.53 for a total of \$2,574.73 for the Sixth Expense Period.

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

8. In accordance with the Receiver Order, I certify that the Sixth 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 Sixth 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 May 19, 2023 at Newark, New Jersey.

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

EXHIBIT A

23
Gibbons P.C.Time Detail
Run Date: 4/26/2023

Client/Matter: 117199	Mark Conlan
106197	Mark Conlan in his capacity as SEC Receiver for Mediat

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
01/24/2023	E-mails with D. Crapo re: Q4 report.	RE05	02062	MC2	0.10	\$35.00
	Sub-Total For Task: RE05 Status Reports				0.10	\$35.00
01/30/2023	Review e-mails from D. Barney and J. Cunningham re: cruising permit for MV Currenseas.	Z017	02062	MC2	0.10	\$35.00
	Sub-Total For Task: Z017 Asset Analysis and Recovery				0.10	\$35.00
01/03/2023	E-mails with J. Curtis and M. Wisbey re: return on deposited funds.	Z019	02062	MC2	0.10	\$35.00
01/03/2023	Confer with D. Crapo re: improving return on deposits.	Z019	02062	MC2	0.10	\$35.00
01/04/2023	Due diligence on bank rates.	Z019	02062	MC2	0.20	\$70.00
01/04/2023	Telephone calls with J. Curtis re: bank rates.	Z019	02062	MC2	0.40	\$140.00
01/04/2023	Confer with R. Malone re: improving bank interest rates.	Z019	02062	MC2	0.30	\$105.00
01/04/2023	Telephone call with J. McGinley at Ankura Trust re: bank interest rates.	Z019	02062	MC2	0.20	\$70.00
01/04/2023	Telephone call with V. Iacovazzi re: M&T Bank banking services.	Z019	02062	MC2	0.20	\$70.00
01/05/2023	Telephone call with J. Curtis and J. McGinley re: US Treasuries.	Z019	02062	MC2	0.30	\$105.00
01/05/2023	Telephone call with SEC Counsel re: investment options.	Z019	02062	MC2	0.50	\$175.00
01/05/2023	Due diligence on investment rates, e-mails with Ankura Trust; Wilmington Trust and J. Curtis re: same.	Z019	02062	MC2	1.40	\$490.00
01/05/2023	Telephone call with N. Adams at Wilmington Trust re: investing in US Treasuries.	Z019	02062	MC2	0.20	\$70.00
01/05/2023	Telephone call with M. Wisbey at Stretto re: bank deposit account interest.	Z019	02062	MC2	0.30	\$105.00
01/06/2023	E-mails with R. Malone re: bank deposits.	Z019	02062	MC2	0.10	\$35.00
01/06/2023	Telephone call with M. Wisbey at Stretto re: bank proposals.	Z019	02062	MC2	0.30	\$105.00
01/06/2023	Telephone call with N. Adams at M&T Bank re: bank proposal.	Z019	02062	MC2	0.20	\$70.00
01/10/2023	E-mails with N. Adams at Wilmington Trust re: bank interest rates.	Z019	02062	MC2	0.20	\$70.00
01/11/2023	Review East West Bank statement; draft follow-up e-mail to M. Wisbey re: reimbursement of bank fees.	Z019	02062	MC2	0.30	\$105.00
01/13/2023	E-mails with J. Curtis and M. Wisbey re: bank account fee credits.	Z019	02062	MC2	0.20	\$70.00
01/13/2023	E-mails with J. Curtis re: bank accounts.	Z019	02062	MC2	0.10	\$35.00
01/13/2023	E-mails and telephone call with H. Owens at Wilmington Trust re: know-your-customer (KYC) documentation.	Z019	02062	MC2	0.20	\$70.00
01/17/2023	Attend to e-mails with investor D. Fathers re: status of receivership case.	Z019	02062	MC2	0.20	\$70.00
01/17/2023	E-mails with R. Erekson re: review of EastWest Bank fee credits.	Z019	02062	MC2	0.10	\$35.00
01/18/2023	Complete Wilmington Trust KYC documents.	Z019	02062	MC2	1.00	\$350.00
01/18/2023	Attend to e-mails with H. Owen re: KYC call with Wilmington Trust.	Z019	02062	MC2	0.10	\$35.00
01/18/2023	Telephone call and e-mails with E. Rosen re: Wilmington Trust KYC application.	Z019	02062	MC2	0.20	\$70.00
01/18/2023	Working on KYC package for Wilmington Trust.	Z019	02062	MC2	0.40	\$140.00
01/19/2023	WebEx call with Wilmington Trust KYC team (0.4); e-mail KYC package to H. Owen at Wilmington Trust (0.1).	Z019	02062	MC2	0.50	\$175.00
01/19/2023	Teams call with M. Boyd and J. Krugman at Axos Bank re: potential deposit account.	Z019	02062	MC2	0.50	\$175.00
01/19/2023	Telephone call with Chris Blau re: Ahmed bank setup.	Z019	02062	MC2	0.40	\$140.00
01/20/2023	E-mails with Wilmington Trust re: collateralizing accounts.	Z019	02062	MC2	0.20	\$70.00
01/20/2023	Attend to e-mails with N. Adams and H. Owen at Wilmington Trust re: collateralization, access to T-Bills and edits to Escrow Agreement.	Z019	02062	MC2	0.50	\$175.00
01/20/2023	Telephone call with D. Barney re: banking options.	Z019	02062	MC2	0.40	\$140.00
01/23/2023	E-mails with Wilmington Trust re: investments in T-Bills.	Z019	02062	MC2	0.20	\$70.00
01/23/2023	Review Receivership Appointment Order re: scope of investment authority.	Z019	02062	MC2	0.30	\$105.00
01/24/2023	Review and revise Wilmington Trust Escrow Agreement (0.2); review D. Barney's edits to same (0.1).	Z019	02062	MC2	0.30	\$105.00
01/24/2023	Attend to e-mails with H. Owen at Wilmington Trust re: KYC documents.	Z019	02062	MC2	0.10	\$35.00
01/24/2023	Telephone call with H. Owen at Wilmington Trust re: KYC information.	Z019	02062	MC2	0.10	\$35.00

Gibbons P.C.

Time Detail

Run Date: 4/26/2023

Client/Matter: 117199	Mark Conlan
106197	Mark Conlan in his capacity as SEC Receiver for Mediat

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
01/24/2023	Further revisions to escrow agreement; e-mails with Wilmington Trust re: same.	Z019	02062	MC2	0.30	\$105.00
01/25/2023	Attend to e-mails with N. Adams and H. Owen at Wilmington Trust re: edits to proposed form of Escrow Agreement.	Z019	02062	MC2	0.60	\$210.00
01/26/2023	E-mails with J. Curtis re: interest credited to accounts.	Z019	02062	MC2	0.10	\$35.00
01/26/2023	E-mails with L. Misner at M&T Financial Services re: T-Bill Rates.	Z019	02062	MC2	0.10	\$35.00
01/30/2023	E-mails with J. Krogman at Axos Bank re: investment of funds.	Z019	02062	MC2	0.10	\$35.00
02/06/2023	Attend to e-mails with Lloyds Road insurance agent re: policy refund.	Z019	02062	MC2	0.20	\$70.00
02/06/2023	Review, sign and transmit Policy Release form to Lloyds Road insurance agent.	Z019	02062	MC2	0.20	\$70.00
02/08/2023	Review January bank statement (0.2); attend to follow-up call with M. Conforti (0.1); e-mails with R. Erekson re: same (0.1).	Z019	02062	MC2	0.40	\$140.00
02/14/2023	Review and sign U.S. Coast Guard Application for Certificate of Documentation.	Z019	02062	MC2	0.20	\$70.00
02/15/2023	E-mails with Wilmington Trust re: approval of investment order.	Z019	02062	MC2	0.10	\$35.00
02/15/2023	Attend to e-mails and telephone calls with Wilmington Trust, D. Barney and J. Curtis re: setting up new accounts at Wilmington Trust.	Z019	02062	MC2	0.90	\$315.00
02/15/2023	Telephone call with J. Curtis re: setting up wire transfers.	Z019	02062	MC2	0.10	\$35.00
02/15/2023	E-mails with H. Owens at Wilmington Trust re: releasing signatures from escrow; e-mails with J. Curtis re: initiating wire transfers.	Z019	02062	MC2	0.10	\$35.00
02/16/2023	Telephone confirmation with EastWest Bank re: outgoing wire transfers.	Z019	02062	MC2	0.10	\$35.00
02/16/2023	Attending to telephone calls and e-mails with H. Owen at Wilmington Trust re: receipt of wire transfers.	Z019	02062	MC2	0.20	\$70.00
02/17/2023	Attend to online access for Rocky Mountain Advisory re: Wilmington Trust	Z019	02062	MC2	0.20	\$70.00
02/28/2023	Telephone call with R. Erekson re: bank deposits.	Z019	02062	MC2	0.10	\$35.00
02/28/2023	Attend to e-mails and telephone call with R. Erekson re: payment of Arapahoe County taxes.	Z019	02062	MC2	0.20	\$70.00
03/02/2023	E-mails with Wilmington Trust, M&T Bank and D. Barney re: T-Bill investments.	Z019	02062	MC2	0.20	\$70.00
03/02/2023	Prepare for and participate in telephone call with M&T Bank and Wilmington Trust re: T-Bill investments.	Z019	02062	MC2	0.80	\$280.00
03/03/2023	Attend to e-mails with D. Barney and Wilmington Trust re: purchasing T-Bills and reviewing account statements.	Z019	02062	MC2	0.30	\$105.00
03/09/2023	Review February EastWest Bank Statements.	Z019	02062	MC2	0.10	\$35.00
03/10/2023	Reviewing Wilmington Trust Bank statements.	Z019	02062	MC2	0.10	\$35.00
03/10/2023	Draft written directives to Wilmington Trust re: investments in T-Bills; e-mails with H. Owen and Wilmington Trust re: same.	Z019	02062	MC2	0.40	\$140.00
03/10/2023	Attending to e-mails and telephone call with J. Curtis re: transferring remaining balance from EastWest Bank to Wilmington Trust.	Z019	02062	MC2	0.20	\$70.00
03/13/2023	Review EastWest Bank statements.	Z019	02062	MC2	0.10	\$35.00
03/13/2023	E-mails with M. Carcich at Freedom Bank re: opening operating account.	Z019	02062	MC2	0.20	\$70.00
03/13/2023	Telephone calls with H. Owen re: wire from EastWest Bank and purchase of T-Bills.	Z019	02062	MC2	0.20	\$70.00
03/13/2023	Attend to e-mails with R. Erekson re: EastWest wire authorization.	Z019	02062	MC2	0.20	\$70.00
03/13/2023	Prepare, sign and transmit Written Direction Letter for (\$475k) fund transfer.	Z019	02062	MC2	0.20	\$70.00
03/13/2023	Telephone call with Santiago at EastWest Bank confirming outgoing wire transfer.	Z019	02062	MC2	0.10	\$35.00
03/13/2023	Attend to wire confirmations with H. Owen, J. Curtis and R. Erekson.	Z019	02062	MC2	0.10	\$35.00
03/14/2023	Confer with D. Barney re: T-Bill investments.	Z019	02062	MC2	0.10	\$35.00
03/14/2023	Telephone call with H. Owen re: accessing online banking information.	Z019	02062	MC2	0.10	\$35.00
03/14/2023	Reviewing account balances at Wilmington Trust (0.2); review and analyze T-Bill yields (0.3); determine purchase quantities (0.5); prepare, sign and transmit written directions to Wilmington Trust and M&T Financial (0.5).	Z019	02062	MC2	1.50	\$525.00
03/14/2023	Attend to e-mails with M. Carcich and J. Flood at Freedom Bank re: opening account.	Z019	02062	MC2	0.20	\$70.00
03/14/2023	Review T-Bill Trade confirmations; attend to e-mails with H. Owen re: same.	Z019	02062	MC2	0.20	\$70.00
03/15/2023	Attend to e-mails with J. Curtis, R. Erekson, E. Rosen and H. Owen re: payment of professional fees.	Z019	02062	MC2	0.10	\$35.00
03/15/2023	E-mails with J. Flood at Freedom Bank re: opening operating account.	Z019	02062	MC2	0.10	\$35.00

Gibbons P.C.

Time Detail

Run Date: 4/26/2023

Client/Matter: 117199	Mark Conlan
106197	Mark Conlan in his capacity as SEC Receiver for Mediat

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
03/15/2023	Prepare written instruction letter to Wilmington Trust to pay fees.	Z019	02062	MC2	0.20	\$70.00
03/15/2023	Telephone call with T. Parker at Wilmington Trust confirming wire instructions; e-mails with T. Cafferty re: same.	Z019	02062	MC2	0.20	\$70.00
03/16/2023	E-mails with Freedom Bank re: depository account.	Z019	02062	MC2	0.10	\$35.00
03/20/2023	Review Wilmington Trust online account portal; create investment tracking spreadsheet.	Z019	02062	MC2	0.70	\$245.00
03/21/2023	Review account balances.	Z019	02062	MC2	0.10	\$35.00
03/22/2023	Attending to KYC request from Connect One Bank.	Z019	02062	MC2	0.30	\$105.00
03/23/2023	Telephone call with L. Kramer at Freedom Bank re: KYC information for deposit accounts.	Z019	02062	MC2	0.20	\$70.00
03/23/2023	Prepare written directive for payment of Young Homeowners Insurance and Epiq eDiscovery invoices.	Z019	02062	MC2	0.30	\$105.00
03/23/2023	Telephone call with E. Rosen re: suggested changes to receivership website.	Z019	02062	MC2	0.10	\$35.00
03/23/2023	Telephone call with T. Parker at Wilmington Trust confirming payments to Safeco Insurance and Epiq eDiscovery Solutions.	Z019	02062	MC2	0.10	\$35.00
03/24/2023	Attend to e-mails with Connect One Bank re: new fiduciary account.	Z019	02062	MC2	0.10	\$35.00
03/24/2023	Telephone call with Lisa Kramer at Freedom Bank re: KYC information for new deposit account.	Z019	02062	MC2	0.10	\$35.00
03/24/2023	Complete KYC documentation for Freedom Bank account (0.1); transmit same to L. Kramer at Freedom Bank (0.4).	Z019	02062	MC2	0.50	\$175.00
03/27/2023	E-mails with Freedom Bank and Connect One Bank re: new depository accounts	Z019	02062	MC2	0.10	\$35.00
03/28/2023	Attend to payment of Wilmington Trust annual fee invoice (0.1); e-mails with H. Owen re: same (0.1).	Z019	02062	MC2	0.20	\$70.00
03/28/2023	E-mails with Connect One re: opening new depository account.	Z019	02062	MC2	0.10	\$35.00
03/28/2023	Attend to e-mails with Freedom Bank re: new depository accounts.	Z019	02062	MC2	0.20	\$70.00
03/29/2023	Telephone call with L. Kramer at Freedom Bank re: opening new deposit account.	Z019	02062	MC2	0.10	\$35.00
03/29/2023	Telephone call with J. Licursi at Connect One Bank re: opening depository account.	Z019	02062	MC2	0.10	\$35.00
03/30/2023	Telephone call with L. Kramer at Freedom Bank re: signature card.	Z019	02062	MC2	0.10	\$35.00
03/30/2023	Review, revise, sign and deliver Connect One Bank signature form.	Z019	02062	MC2	0.20	\$70.00
03/30/2023	Review, sign and deliver Freedom Bank signature card.	Z019	02062	MC2	0.20	\$70.00
03/30/2023	E-mails with L. Kramer at Freedom Bank re: opening new depository account.	Z019	02062	MC2	0.30	\$105.00
03/30/2023	Prepare written direction to Wilmington Trust to fund Freedom Bank account; telephone calls with L. Kramer re: same.	Z019	02062	MC2	0.30	\$105.00
03/30/2023	Review, sign and transmit Written Direction to Wilmington Trust to fund Freedom Bank account (0.1); e-mails with H. Owen re: same (0.1).	Z019	02062	MC2	0.20	\$70.00
03/31/2023	Attend to e-mails with Wilmington Trust re: funding Freedom Bank account.	Z019	02062	MC2	0.10	\$35.00
03/31/2023	E-mails with J. Curtis re: Freedom Bank account.	Z019	02062	MC2	0.10	\$35.00
03/31/2023	Telephone call with T. Cafferty re: confirmation of Freedom Bank wire instructions.	Z019	02062	MC2	0.10	\$35.00
03/31/2023	Telephone call with T. Parker at Wilmington Trust re: confirming Freedom Bank wire.	Z019	02062	MC2	0.10	\$35.00
	Sub-Total For Task: Z019 Business Operations				26.50	\$9,275.00
02/15/2023	Attend to e-mails re: returned 1099 for Robb Evans & Associates.	Z020	02062	MC2	0.10	\$35.00
	Sub-Total For Task: Z020 Case Administration				0.10	\$35.00
01/17/2023	Review and revise Corr Cronin engagement letter (0.2); e-mails with counsel re: same (0.1).	Z023	02062	MC2	0.30	\$105.00
01/18/2023	Review and sign Corr Cronin retention letter.	Z023	02062	MC2	0.30	\$105.00
02/27/2023	Review retention proposal from Faegre Drinker re: retention of special counsel to investigate prime broker claim.	Z023	02062	MC2	0.10	\$35.00
	Sub-Total For Task: Z023 Employment Applications				0.70	\$245.00
01/23/2023	Review Barnes & Thornburg Q4 invoices.	Z025	02062	MC2	0.10	\$35.00
01/27/2023	Telephone call with E. Rosen re: Q4 Fee application.	Z025	02062	MC2	0.20	\$70.00

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Gibbons P.C.

Time Detail
Run Date: 4/26/2023

Client/Matter:	117199	Mark Conlan
	106197	Mark Conlan in his capacity as SEC Receiver for Mediat

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
	Sub-Total For Task: Z025 Fee Applications				0.30	\$105.00
01/17/2023	Review Geluk Capital Cease & Desist Order.	Z029	02062	MC2	0.20	\$70.00
	Sub-Total For Task: Z029 Litigation				0.20	\$70.00
01/13/2023	E-mails with E. Rosen re: W-9 form for Receivership estate.	Z076	02062	MC2	0.20	\$70.00
	Sub-Total For Task: Z076 Tax Issues				0.20	\$70.00
01/17/2023	Review docket in Bahamas Forfeiture action (0.1); draft follow-up e-mail to V. Drohan re: status of 704 Ocean Place property (0.1).	ZD03	02062	MC2	0.20	\$70.00
02/09/2023	Review insurance cancellation memo on Lloyds Road property.	ZD03	02062	MC2	0.10	\$35.00
02/22/2023	Attend to e-mails with D. Crapo, R. Ereksen and T. Ashmore re: Young's overdue real property taxes.	ZD03	02062	MC2	0.10	\$35.00
03/10/2023	Review e-mail from T. Ashmore with copy of Young's homeowner's policy; review and file copy of same.	ZD03	02062	MC2	0.20	\$70.00
03/20/2023	Review renewal notice re: Youngs' homeowners' policy; e-mails with T. Ashmore re: same.	ZD03	02062	MC2	0.10	\$35.00
03/22/2023	Attend to e-mails with T. Ashmore and Wilmington Trust re: insurance renewal on Greenwood Village home.	ZD03	02062	MC2	0.20	\$70.00
	Sub-Total For Task: ZD03 Asset Disposition				0.90	\$315.00
	Total For Matter: 106197 Mark Conlan in his capacity as SEC Recei				29.10	\$10,185.00
Totals For Client:					29.10	\$10,185.00

Gibbons P.C.

Time Summary
Run Date: 4/26/2023

Client/Matter: 117199	Mark Conlan
106197	Mark Conlan in his capacity as SEC Receiver for Mediat

Atty Code	Initials	Attorney Name	Position	Hours	Avg Rate	Value
02062	MC2	Conlan, Mark	Director	29.10	\$350.00	\$10,185.00
Totals:				29.10		\$10,185.00

Gibbons P.C.

Fee Application
Run Date: 4/26/2023

Client/Matter: 117199	Mark Conlan
106197	Mark Conlan in his capacity as SEC Receiver for Mediat

Phase/ Code	Description Of Services	Hours	Value
<u>Z119</u>	<u>Factual investigation</u>		
	02062 Conlan, Mark	29.10	\$10,185.00
Z119	Factual investigation	29.10	\$10,185.00
Totals:		29.10	\$10,185.00

Gibbons P.C.

Fee Application
Run Date: 4/26/2023

Client/Matter: 117199 Mark Conlan 106197 Mark Conlan in his capacity as SEC Receiver for Mediat

Task/ Code	Description Of Services	Hours	Value
RE05	Status Reports	0.10	\$35.00
Z017	Asset Analysis and Recovery	0.10	\$35.00
Z019	Business Operations	26.50	\$9,275.00
Z020	Case Administration	0.10	\$35.00
Z023	Employment Applications	0.70	\$245.00
Z025	Fee Applications	0.30	\$105.00
Z029	Litigation	0.20	\$70.00
Z076	Tax Issues	0.20	\$70.00
ZD03	Asset Disposition	0.90	\$315.00
Totals:		29.10	\$10,185.00

Gibbons P.C.

Fee Application
Run Date: 4/26/2023

Client/Matter:	117199	Mark Conlan
	106197	Mark Conlan in his capacity as SEC Receiver for Mediat

Task Code	Description Of Services	Hours	Value
<u>RE05</u>	<u>Status Reports</u>		
	02062 Conlan, Mark	0.10	\$35.00
RE05	Status Reports	0.10	\$35.00
<u>Z017</u>	<u>Asset Analysis and Recovery</u>		
	02062 Conlan, Mark	0.10	\$35.00
Z017	Asset Analysis and Recovery	0.10	\$35.00
<u>Z019</u>	<u>Business Operations</u>		
	02062 Conlan, Mark	26.50	\$9,275.00
Z019	Business Operations	26.50	\$9,275.00
<u>Z020</u>	<u>Case Administration</u>		
	02062 Conlan, Mark	0.10	\$35.00
Z020	Case Administration	0.10	\$35.00
<u>Z023</u>	<u>Employment Applications</u>		
	02062 Conlan, Mark	0.70	\$245.00
Z023	Employment Applications	0.70	\$245.00
<u>Z025</u>	<u>Fee Applications</u>		
	02062 Conlan, Mark	0.30	\$105.00
Z025	Fee Applications	0.30	\$105.00
<u>Z029</u>	<u>Litigation</u>		
	02062 Conlan, Mark	0.20	\$70.00
Z029	Litigation	0.20	\$70.00
<u>Z076</u>	<u>Tax Issues</u>		
	02062 Conlan, Mark	0.20	\$70.00
Z076	Tax Issues	0.20	\$70.00
<u>ZD03</u>	<u>Asset Disposition</u>		
	02062 Conlan, Mark	0.90	\$315.00
ZD03	Asset Disposition	0.90	\$315.00
Totals:		29.10	\$10,185.00

EXHIBIT B

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



April 17, 2023

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

Invoice Number: 16499
 Invoice Period: 01-03-2023 - 03-31-2023

Payment Terms: Net 15

RE: Mediatrix Capital

SEC v. Mediatrix

Time Details

Date	Staff Member	Description	Hours	Rate	Amount
<u>Accounting</u>					
01-05-2023	JHC	Call with M. Conlan on interest rates and moving funds, proposals from banks and trusts (.3). Call with Ankura Trust on terms and security of funds (.2). Reviewed follow up emails on moving funds and SEC response (.2).	0.70	345.00	241.50
01-12-2023	HD	Began updating QuickBooks with Quarter 4 activity.	2.90	250.00	725.00
01-13-2023	JHC	Email communications and call with J. Krogman regarding potential transfer to Axos bank, interest rates, etc. (.2). Email communications with Receiver and Stretto on fee refunds and related issues (.2).	0.40	345.00	138.00
01-18-2023	JHC	Reviewed accounts for interest income and follow up with M. Conlan (.2). Follow up with M. Wisbey on interest income (.2). Updated banking application to access Mediatrix accounts (.3). Reviewed and signed certification related to default judgment against broker (.4).	1.10	345.00	379.50
01-20-2023	JHC	Reviewed quarterly report for Q4 2022 and provided reports to E. Rosen.	0.60	345.00	207.00
01-20-2023	HD	Finished updating QuickBooks with Q4 data (1.3). Prepared exhibits for MOR and sent to J. Curtis for review (1.0).	2.30	250.00	575.00
01-23-2023	HD	Corresponded with E. Rosen regarding necessary changes to exhibits for the Q4 2022 MOR.	0.30	250.00	75.00
02-15-2023	JHC	Reviewed and provided account balances to M. Conlan and communications regarding the same (.4). Worked with R. Erektion on preparing large wire transfer documentation for transfers of funds to Wilmington Trust account (.3).	0.70	345.00	241.50
03-03-2023	JHC	Set up online access to Wilmington Trust	0.80	345.00	276.00

Date	Staff Member	Description	Hours	Rate	Amount
<u>Accounting</u>					
		accounts and confirmed access.			
03-15-2023	JHC	Provided wire information to M. Conforti and communications with Receiver on banking information (.2). Provided account information to counsel (.2). Directed R. Erektion in preparation of checks (.1).	0.50	345.00	172.50
03-31-2023	JHC	Provided account access to H. Denison for quarterly report (.3). Searched for address information available for investors and provided data and source to M. Conlan along with source of database used for investor analysis (1.2).	1.50	345.00	517.50
03-31-2023	SO	Update QuickBooks and begin entering Q1 expenses and deposits.	2.00	240.00	480.00
			13.80		4,028.50
<u>Case Administration</u>					
01-12-2023	RE	Deposit settlement checks and document for the file.	0.20	100.00	20.00
01-24-2023	HD	Corresponded with E. Rosen regarding amounts to include in Q4 2022 Receiver report.	0.30	250.00	75.00
01-26-2023	JHC	Reviewed bank accounts for interest posting, updated receiver with amounts of interest deposits and responded regarding quarterly report update.	0.40	345.00	138.00
02-03-2023	JHC	Reviewed fee application description relative to RMA fee application and responded to E. Rosen (.3). Responded to R. Erektion on accounting for incoming wires (.1).	0.40	345.00	138.00
02-09-2023	RE	Deposit settlement payment and document.	0.10	100.00	10.00
02-15-2023	RE	Begin preparation of outgoing wires to transfer funds from East West Bank to M&T Trust.	1.10	100.00	110.00
02-16-2023	RE	Finalize and submit outgoing wire transfer requests from East West Bank to M & T Trust.	0.60	100.00	60.00
02-22-2023	RE	Communications with Arapahoe County Treasurer's office regarding taxes due for Young residence and update Receiver.	0.50	100.00	50.00
02-28-2023	RE	Prepare checks for tax payments to Arapahoe County Treasurer, communicate with Receiver, and send to taxing authority.	0.50	100.00	50.00
03-07-2023	RE	Deposit settlement check and insurance refund check into account.	0.20	100.00	20.00
03-10-2023	JHC	Call with M. Conlan on moving funds to Wilmington Trust (.2). Call R. Erektion and provided direction on wiring most of remaining funds to Wilimington Trust (.2). Email communications with M. Conlan and R. Erektion regarding bank accounts and wire (.2).	0.60	345.00	207.00
03-13-2023	JHC	Assisted R. Erektion with wire of funds to Wilmington Trust accounts (.2). Reviewed amounts and updated M. Conlan on status of remaining funds to be transferred (.2).	0.40	345.00	138.00
03-13-2023	RE	Prepare wire to transfer funds to new Wilmington Trust Account and document all for the file.	0.20	100.00	20.00
03-15-2023	RE	Generate checks for payment of services for fifth	0.40	100.00	40.00

<u>Date</u>	<u>Staff Member</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<u>Case Administration</u>					
03-31-2023	HD	quarterly fee application for receiver and professionals (.2). Post settlement payment to the ledger (.1). Document all for the file (.1). Began preparation of Q1 2023 quarterly report by downloading bank statements and directing S. Ott on recording cash transactions in QuickBooks.	1.40	250.00	350.00
			7.30		1,426.00
<u>Claims Administration</u>					
03-24-2023	JHC	Prepared summary of claims by payee/payor, reviewed and revised the same and reviewed against other documents and data (1.9). Sent summary of claims to M. Conlan with explanation (.4). Researched bank records in support of charitable contribution payment and responded to D. Crapo (.6).	2.90	345.00	1,000.50
			2.90		1,000.50
<u>Forensic/Investigation</u>					
01-03-2023	JHC	Reviewed email communications on change to interest rate on accounts and responded (.2). Analyzed responses and documents submitted by Mercury Alternative Fund to provide response to counsel (1.0).	1.20	345.00	414.00
01-04-2023	JHC	Call with M. Conlan on moving receivership funds to obtain higher rates of return (.3). Reviewed interest rates at various banks and responded to receiver (.5). Analyzed Mercury Alternative fund documents and data and provided detailed response to M. Conforti (.9). Researched and compiled supporting documentation for P. Velcich payments and provided to M. Conforti (.7).	2.40	345.00	828.00
01-12-2023	JHC	Researched payments to Puerto Rico charity and extracted cancelled checks and support for payments; provided the same to D. Crapo.	0.60	345.00	207.00
02-21-2023	JHC	Reviewed declaration regarding P. Velcich commission payments, signed declaration and submitted to council for filing.	0.70	345.00	241.50
03-23-2023	JHC	Reviewed investor analysis to respond to M. Conlan (.5). Reviewed data available to determine investor analysis (.2). Analyzed cash flow summary for Mediatrix and related data and information and responded to M. Conlan regarding likely investor losses and response to Defendants' claims (1.5).	2.20	345.00	759.00
			7.10		2,449.50
<u>Tax Work</u>					
01-13-2023	HD	Reviewed cash ledger for payments requiring a 1099.	0.30	250.00	75.00
01-17-2023	JG	Analyze for/review 1099 filings.	0.40	265.00	106.00
01-18-2023	HD	Requested W-9s for vendors who received payments requiring a 1099.	0.40	250.00	100.00
01-25-2023	SO	Phone calls and emails regarding missing W-9's.	1.10	240.00	264.00
			2.20		545.00

Date	Staff Member	Description	Hours	Rate	Amount
			Total		9,449.50

Time Summary

Staff Member	Hours	Rate	Amount
Heather Denison	7.90	250.00	1,975.00
John H. Curtis	18.10	345.00	6,244.50
Josh Gifford	0.40	265.00	106.00
Raani Erekson	3.80	100.00	380.00
Saria Ott	3.10	240.00	744.00
Total	33.30		9,449.50

Expense Summary

Expense	Amount
Copies	2.55
Overnight Expenses	19.87
PACER	4.50
Postage	1.17
Supplies - Tax Forms	31.58
Total Expenses	59.67

Total for this Invoice	9,509.17
Previous Invoice Balance	6,050.43
Payment - 1056 on 03-20-2023	(6,050.43)
Total Amount to Pay as of 04-21-2023	9,509.17

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



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

April 17, 2023

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

Invoice Number: 16499
Invoice Period: 01-03-2023 - 03-31-2023

REMITTANCE COPY

RE: Mediatrix Capital

Fees	9,449.50
Expenses	59.67
Total for this Invoice	9,509.17
Previous Invoice Balance	6,050.43
Payment - 1056 on 03-20-2023	(6,050.43)
Total Amount to Pay as of 04-21-2023	9,509.17

Project	Balance Due
Mediatrix Capital	9,509.17
Total Amount to Pay	9,509.17

Open Invoices and Credits

Date	Transaction	Project	Amount	Applied	Balance
04-17-2023	Invoice 16499	Mediatrix Capital	9,509.17		9,509.17
				Balance	9,509.17

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



EXHIBIT C

CORR CRONIN | LLP
 A Limited Liability Partnership
1015 Second Avenue Floor 10
Seattle, WA 98104-1001
 TEL: 206-625-8600 FAX: 206-625-0900
 Tax ID # 91-1952756

Mark Conlan
 c/o Gibbons P.C.
 One Gateway Center
 Newark NJ 07102-5310

Page: 1
 01/31/2023
 Account No: 2061-00001M
 Statement No: 1

Attn: Mark Conlan

Re: Matthew Gray

FEEES

			<u>RATE</u>	<u>HOURS</u>	
01/12/2023	TTW	Review incoming order from court on appointment of local counsel and confer with M. Conforti re same.	472.00	0.20	94.40
01/18/2023	TTW	Review and revise draft complaint to conform to Washington pleading requirements (.5); circulate draft complaint to M. Conforti for approval (.1); finalize complaint for filing and prepare summons for service (.4); review incoming case schedule and judge assignment sheet and circulate to M. Conforti with analysis (.4).	472.00	1.40	660.80
01/19/2023	TTW	Review incoming update from process sever and respond to same.	472.00	0.20	94.40
	TTW	Review and add to service package and approve for service.	472.00	0.20	94.40
01/20/2023	JSS	Research new service address for M. Gray.	160.00	0.20	32.00
	TTW	Review additional data on service address and confer with staff re new service attempt.	472.00	0.20	94.40
01/23/2023	TTW	Review email from process server and confer with process server re service attempt details (.2); exchange emails with M. Conforti re update on attempts to serve process and next steps (.3); prepare acceptance of service form for service via email (.2).	472.00	0.70	330.40
01/29/2023	TTW	Review update from client re service and save signed affidavit of service to records; respond to email from M. Conforti.	472.00	0.20	94.40
		FOR LEGAL SERVICES RENDERED THROUGH 01/31/2023		3.30	1,495.20

SUMMARY OF TIME

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Todd Williams	Partner	3.10	\$472.00	\$1,463.20
Julia S. Segner	Paralegal	0.20	160.00	32.00

Mark Conlan

Page: 2

01/31/2023

Account No: 2061-00001M
Statement No: 1

Re: Matthew Gray

ADVANCES

01/31/2023	Filing Fee - King Co. Superior Ct-Electronic Filing ER (filing fee re complaint and exhibits 1/18/23)	<u>242.49</u>
	Filing Fee - King Co. Superior Ct-Electronic Filing	242.49
01/31/2023	Process Service - KNR Couriers, LLC (1/19/23 service attempt on M. Gray)	65.00
01/31/2023	Process Service - KNR Couriers, LLC (1/23/23 service attempt on M. Gray)	<u>35.00</u>
	Process Service -	100.00
	TOTAL ADVANCES THROUGH 01/31/2023	<u>342.49</u>
	<u>Total Due for Current Invoice 01/31/2023</u>	1,837.69
	TOTAL DUE	<u>\$1,837.69</u>

Billing History

<u>Fees</u>	<u>Expenses</u>	<u>Advances</u>	<u>Finance Charge</u>	<u>Payments</u>
1,495.20	0.00	342.49	0.00	0.00

Payment is due upon receipt of invoice.

CORR CRONIN | LLP
 A Limited Liability Partnership
 1015 Second Avenue Floor 10
 Seattle, WA 98104-1001
 TEL: 206-625-8600 FAX: 206-625-0900
 Tax ID # 91-1952756

Mark Conlan
 c/o Gibbons P.C.
 One Gateway Center
 Newark NJ 07102-5310

Page: 1
 02/28/2023
 Account No: 2061-00001M
 Statement No: 2

Attn: Mark Conlan

Re: Matthew Gray

EXPENSES

02/13/2023	Lexis/Westlaw Research Thomson Reuters (January 2023)	29.04
	Lexis/Westlaw Research	29.04
		<hr/>
	TOTAL EXPENSES THROUGH 02/28/2023	29.04
	Previous Balance	\$1,837.69
	<u>Total Due for Current Invoice 02/28/2023</u>	29.04
		<hr/>
	TOTAL DUE	<u>\$1,866.73</u>

Aged Due Amounts					
<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
2,109.22	0.00	0.00	0.00	0.00	0.00

Billing History

<u>Fees</u>	<u>Expenses</u>	<u>Advances</u>	<u>Finance Charge</u>	<u>Payments</u>
1,495.20	29.04	584.98	0.00	0.00

Payment is due upon receipt of invoice.

CORR CRONIN | LLP
 A Limited Liability Partnership
 1015 Second Avenue Floor 10
 Seattle, WA 98104-1001
 TEL: 206-625-8600 FAX: 206-625-0900
 Tax ID # 91-1952756

Ellen Rosen
 c/o Gibbons P.C.
 One Gateway Center
 Newark NJ 07102-5310

Page: 1
 03/31/2023
 Account No: 2061-00001M
 Statement No: 3

Attn: Ellen Rosen

Re: Matthew Gray

Duplicate

FEES

			<u>RATE</u>	<u>HOURS</u>	
03/01/2023	TTW	Revise and edit settlement agreement, confession of judgment, and send to client.	472.00	0.90	424.80
03/14/2023	TTW	Review and respond to M. Conforti re possible motion for entry of default.	472.00	0.30	141.60
03/15/2023	TTW	Review and respond to email from M. Conforti re case status and possible edits to confession of judgment.	472.00	0.30	141.60
		FOR LEGAL SERVICES RENDERED THROUGH 03/31/2023		1.50	708.00

SUMMARY OF TIME

<u>Timekeeper</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Todd Williams	Partner	1.50	\$472.00	\$708.00

Previous Balance before Adjustments \$2,109.22

03/31/2023 Write off of \$242.49 filing fee duplicate billing (01/31 & 02/28) -242.49

Previous Balance \$1,866.73

Total Due for Current Invoice 03/31/2023 708.00

TOTAL DUE \$2,574.73

Aged Due Amounts

<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
708.00	1,866.73	0.00	0.00	0.00	0.00

Billing History

	<u>Fees</u>	<u>Expenses</u>	<u>Advances</u>	<u>Finance Charge</u>	<u>Payments</u>
	2,203.20	29.04	584.98	0.00	0.00
Write Off	0.00	0.00	242.49	0.00	

Payment is due upon receipt of invoice.

**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 JANUARY 1, 2023 THROUGH MARCH 31, 2023**

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 January 1, 2023 through March 31, 2023 (the "Sixth 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 \$150,489.50 plus costs of \$838.62 for a total of \$151,328.12 for the Sixth Expense Period¹.

5. In accordance with the Receiver Order, I certify that the Sixth 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 Sixth Quarterly Fee Application were incurred in the best interests of the Receivership Estate.

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

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on May 19, 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 Sixth Quarterly Fee Application ascribed to them.

EXHIBIT A

Gibbons P.C.

Time Detail

Run Date: 4/26/2023

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
01/03/2023	Begin drafting 4th Quarter 2022 Status Report.	RE05	26059	ER	0.60	\$164.70
01/12/2023	Detailed email to J. Curtis at RMA re invoices for Status Report accounting analysis backup; email with prior Receiver's office and counsel regarding Q4 invoices; confer and email with M. Conlan re: same.	RE05	26059	ER	0.20	\$54.90
01/18/2023	Draft Status Report (0.4); email with team re: same (0.1).	RE05	26059	ER	0.50	\$137.25
01/19/2023	Telephone call with E. Rosen re: Q4 Report.	RE05	02062	MC2	0.10	\$59.85
01/19/2023	Draft Status Report (0.7); confer with team re: same (0.1).	RE05	26059	ER	0.80	\$219.60
01/20/2023	Draft Status Report [0.9]; confer with team re: same [0.2].	RE05	26059	ER	1.10	\$301.95
01/23/2023	Draft portions of Status Report for Q4 (1.6); email with team re: same (0.1).	RE05	26059	ER	1.70	\$466.65
01/24/2023	Review and revise Q4 2022 Report (0.5); e-mails with team re: same (0.2).	RE05	02062	MC2	0.70	\$418.95
01/24/2023	Q4 2022 Quarterly Report preparation.	RE05	02548	DC	0.50	\$299.25
01/24/2023	E-mails to/from M. Conlan, M. Conforti and E. Rosen re: Q4 2022 Quarterly Report preparation.	RE05	02548	DC	0.10	\$59.85
01/24/2023	Draft portions of Status Report for Q4 (0.4); email with team re: same (0.2); email RMA re: same (0.2).	RE05	26059	ER	0.80	\$219.60
01/24/2023	Docket deadline for Status Report re: Conlan v. K8EDW.	RE05	26059	ER	0.10	\$27.45
01/25/2023	Prepare Quarterly Status Report for Q4 for electronic filing (0.3); email with team re: same (0.1).	RE05	26059	ER	0.40	\$109.80
01/26/2023	Review and revise Q4 report and exhibits to same (0.2); e-mails with E. Rosen, D. Crapo and M. Conforti re: same (0.1).	RE05	02062	MC2	0.30	\$179.55
01/26/2023	Review e-mails from M. Conlan and E. Rosen re: Q4 2022 Quarterly Report.	RE05	02548	DC	0.10	\$59.85
01/27/2023	Prepare Quarterly Status Report for Q4 for electronic filing (0.3); file and serve same (0.2); review and receipt of as-filed version (0.1); coordinate mail service of same (0.1); email with team re: same (0.1).	RE05	26059	ER	0.80	\$219.60
02/13/2023	E-mails with M. Conforti and D. Crapo re: status report due in K8EDW matter.	RE05	02062	MC2	0.10	\$59.85
02/13/2023	Attend to e-mails with M. Conforti, D. Crapo and E. Rosen re: draft status report in K8EDW matter.	RE05	02062	MC2	0.10	\$59.85
02/13/2023	Draft Joint Status Report for Conlan v. K8EDW (0.3); prepare same for electronic filing (0.1); file and serve same; review and receipt of as-filed copy of same (0.1); email coordinate service of same (0.1); and confer with team re: same (0.1).	RE05	26059	ER	0.70	\$192.15
03/16/2023	Draft Status Report for Conlan v. K8EDW (0.1); confer and email with team re: same (0.1).	RE05	26059	ER	0.20	\$54.90
03/17/2023	Prepare Status Report for Conlan v. K8EDW for electronic filing; file and serve same (0.1); coordinate mail service of same; email with team re: same (0.1).	RE05	26059	ER	0.20	\$54.90
03/23/2023	Email with team re: research on potential status report language.	RE05	26059	ER	1.00	\$274.50
03/31/2023	E-mails with E. Rosen re: Q1 Report (0.1) and updated FAQ page for website (0.1).	RE05	02062	MC2	0.20	\$119.70
03/31/2023	Draft portions of Q1 2023 Quarterly Status Report (0.7); detailed email with team re: same (0.1).	RE05	26059	ER	0.80	\$219.60
	Sub-Total For Task: RE05 Status Reports				12.10	\$4,034.25
01/24/2023	Confer with D. Whitford re: potential production vendor.	RE06	26059	ER	0.10	\$27.45
02/09/2023	Assistance to M. Conlan regarding the preparation of the SOW for delivery to Epiq.	RE06	89266	DW	0.20	\$41.40
02/09/2023	Communications with Scott Segel of Epiq regarding the setup of the Relativity database for this matter.	RE06	89266	DW	0.10	\$20.70
02/17/2023	Communications with Scott Segel of Epiq regarding the ingestion of documents into the Relativity database.	RE06	89266	DW	0.10	\$20.70
02/17/2023	Assistance M. Conlan regarding the creation of a password protected file for posting to the FTP for delivery to vendor for processing and hosting.	RE06	89266	DW	1.60	\$331.20
02/17/2023	Communications with D. Barney, M. Conlan and D. Crapo regarding custodians for database documents.	RE06	89266	DW	0.20	\$41.40
03/23/2023	E-mails with team re: document hosting platform.	RE06	02062	MC2	0.10	\$59.85
03/31/2023	Communication with Courtney Randolph of Epiq regarding the adding of a new user and the removal of another.	RE06	89266	DW	0.30	\$62.10
03/31/2023	Assistance to E. Rosen regarding review of agreements.	RE06	89266	DW	0.30	\$62.10

28
Gibbons P.C.Time Detail
Run Date: 4/26/2023

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
Sub-Total For Task: RE06 Litigation Consulting					3.00	\$666.90
01/03/2023	Telephone call and e-mail to Yaitza Maldonado re: Receiver's claim against Parrochia de San Antonio de Padua.	Z017	02548	DC	0.20	\$119.70
01/04/2023	Participate in conference call with M. Conlan and Tracey Ashcroft, counsel for Michael and Maria Young, re: status of Receiver's claims against charities.	Z017	02548	DC	0.10	\$59.85
01/12/2023	E-mails to/from John Curtis of RMA re: payments to Parrocchia de San Antonio de Padua.	Z017	02548	DC	0.20	\$119.70
01/12/2023	Review cancelled checks to Parrocchia de San Antonio de Padua.	Z017	02548	DC	0.10	\$59.85
01/13/2023	Confer with E. Rosen re: various claims of the Receiver.	Z017	02548	DC	0.10	\$59.85
01/30/2023	Telephone call with D. Barney re: M/V Currenseas.	Z017	02062	MC2	0.10	\$59.85
02/01/2023	E-mails with Library re: ordering Island Bum certificate of formation.	Z017	02062	MC2	0.10	\$59.85
02/01/2023	Review Certificate of Formation for Island Bum LLC (M/V Currenseas owner); e-mails with Library re: same and annual reports.	Z017	02062	MC2	0.10	\$59.85
02/22/2023	Review court notices.	Z017	02548	DC	0.10	\$59.85
03/01/2023	Review e-mails to/from various parties re: Michael and Maria Young's scheduling motion.	Z017	02548	DC	0.10	\$59.85
03/22/2023	Review e-mails from Michael and Maria Young's counsel re: insurance.	Z017	02548	DC	0.10	\$59.85
03/23/2023	Due diligence on missing BMWs in the Bahamas (0.2); e-mails with D. Barney and T. Ashmore re: same (0.2).	Z017	02062	MC2	0.40	\$239.40
03/24/2023	E-mails to/from M. Conlan re: status of claims against charities.	Z017	02548	DC	0.10	\$59.85
03/24/2023	E-mail to Mr. Welsh re: tolling agreement.	Z017	02548	DC	0.10	\$59.85
03/24/2023	E-mail to John Curtis of RMA re: the donations by Michael and Maria Young to the Archdiocese of Philadelphia.	Z017	02548	DC	0.30	\$179.55
Sub-Total For Task: Z017 Asset Analysis and Recovery					2.20	\$1,316.70
01/03/2023	Confer with M. Conlan re: collected funds on deposit.	Z019	02548	DC	0.10	\$59.85
01/03/2023	Review e-mail from M. Conlan re: funds on deposit.	Z019	02548	DC	0.10	\$59.85
01/04/2023	Confer with M. Conlan re: collected funds on deposit.	Z019	02548	DC	0.10	\$59.85
01/06/2023	Reviewing Wilmington Trust escrow agreement.	Z019	02062	MC2	0.50	\$299.25
01/06/2023	Attending to e-mails with Wilmington Trust re: escrow agreement.	Z019	02062	MC2	0.40	\$239.40
01/10/2023	Confer with M. Conlan re: deposit of receivership funds with Wilmington Trust.	Z019	02518	DEB	0.30	\$179.55
01/10/2023	Review Wilmington Trust Escrow Agreement.	Z019	02518	DEB	1.10	\$658.35
01/10/2023	Telephone call with D. Barney re: Mediatrix deposit accounts.	Z019	02062	MC2	0.20	\$119.70
01/10/2023	Reviewing and revising Wilmington Trust Escrow Agreement.	Z019	02062	MC2	1.00	\$598.50
01/11/2023	Confer with M. Conlan and N. Adams re: Wilmington Trust escrow agreement for deposit of \$24 million receivership funds.	Z019	02518	DEB	0.60	\$359.10
01/11/2023	Reviewing Wilmington Trust Escrow Agreement.	Z019	02062	MC2	0.20	\$119.70
01/11/2023	Teams call with D. Barney and N. Adams working through issues with Wilmington Trust Escrow Agreement.	Z019	02062	MC2	0.50	\$299.25
01/11/2023	Reviewing and revising Wilmington Trust escrow agreement.	Z019	02062	MC2	2.80	\$1,675.80
01/12/2023	Review/revise Wilmington Trust escrow agreement.	Z019	02518	DEB	1.10	\$658.35
01/12/2023	E-mails with D. Barney re: Wilmington Trust Escrow Agreement (0.1); further revisions to same (0.2),	Z019	02062	MC2	0.30	\$179.55
01/13/2023	Review emails re: Wilmington Trust escrow agreement and review agreement.	Z019	02518	DEB	0.20	\$119.70
01/17/2023	Attend to e-mails with D. Crapo, investor and D. Porteous re: investor inquiry.	Z019	02062	MC2	0.10	\$59.85
01/18/2023	Review and receipt of investor inquiries.	Z019	26059	ER	0.20	\$54.90
01/19/2023	Telephone with SEC staff and Wilmington Trust rep re: escrow accounts.	Z019	02518	DEB	0.40	\$239.40
01/19/2023	Review Wilmington Trust proposed edits to Escrow Agreement (0.4); revise same (0.3); e-mails with Wilmington Trust re: same (0.2).	Z019	02062	MC2	0.90	\$538.65
01/19/2023	Conference call with M. Conforti and SEC counsel re: broker claims and Wilmington Trust Escrow Agreement.	Z019	02062	MC2	0.70	\$418.95

28
Gibbons P.C.Time Detail
Run Date: 4/26/2023

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
01/20/2023	Review emails re: Wilmington Trust escrow account.	Z019	02518	DEB	0.30	\$179.55
01/20/2023	Confer with M. Conlan re: Wilmington Trust Escrow account and alternatives.	Z019	02518	DEB	0.40	\$239.40
01/23/2023	Review Ahmed motion for order authorizing T Bill account and emails to/from M. Conlan re: same.	Z019	02518	DEB	0.70	\$418.95
01/23/2023	Revise Wilmington Trust escrow agreement and emails re: same.	Z019	02518	DEB	1.30	\$778.05
01/23/2023	Review sample investment motion (0.2); e-mails with D. Barney re: same (0.1).	Z019	02062	MC2	0.30	\$179.55
01/23/2023	Draft detailed e-mail to counsel re: filing investment motion unopposed.	Z019	02062	MC2	0.30	\$179.55
01/23/2023	Drafting Investment Motion.	Z019	02062	MC2	0.50	\$299.25
01/23/2023	Review latest draft Escrow Agreement from Wilmington Trust (0.3); revise same; e-mails with D. Barney re: same (0.1).	Z019	02062	MC2	0.40	\$239.40
01/24/2023	Review/Revise Wilmington Trust Escrow agreement.	Z019	02518	DEB	0.50	\$299.25
01/24/2023	Confer with M. Conlan and Wilmington Trust team re: Escrow Agreement.	Z019	02518	DEB	0.70	\$418.95
01/24/2023	Conference call with D. Barney and Wilmington Trust team re: edits to proposed form of Escrow Agreement.	Z019	02062	MC2	0.70	\$418.95
01/24/2023	Further revisions to Wilmington Trust Escrow Agreement; e-mails with D. Barney re: same.	Z019	02062	MC2	0.20	\$119.70
01/24/2023	Working on investment motion.	Z019	02062	MC2	0.90	\$538.65
01/25/2023	Review final Wilmington Trust escrow agreement (0.3); confer with M. Conlan re: same (0.2).	Z019	02518	DEB	0.50	\$299.25
01/25/2023	Drafting Investment Motion.	Z019	02062	MC2	3.30	\$1,975.05
01/25/2023	E-mails and telephone call with Wilmington Trust re: fee structure on T-Bill investments.	Z019	02062	MC2	0.20	\$119.70
01/25/2023	Telephone calls with D. Barney re: edits to Wilmington Trust proposed form of Escrow Agreement.	Z019	02062	MC2	0.20	\$119.70
01/25/2023	Further edits to escrow agreement (0.3); e-mail same to Wilmington Trust team (0.1).	Z019	02062	MC2	0.40	\$239.40
01/25/2023	Conduct research re: government securities for investment motion.	Z019	30611	KPM	1.40	\$459.90
01/25/2023	Draft summary of criminal case status for Investment Motion [0.7]; email with team re: same [0.1].	Z019	26059	ER	0.70	\$192.15
01/26/2023	Review/revise motion to approve Wilmington Trust escrow agreement and treasury investment (1.4); confer with M. Conlan re: same (0.2).	Z019	02518	DEB	1.60	\$957.60
01/26/2023	Emails to/from M. Conlan and Wilmington Trust re: T Bill investments and yields.	Z019	02518	DEB	0.30	\$179.55
01/26/2023	Review final Wilmington Trust escrow agreement and attachments (0.3); confer with M. Conlan re: same (0.2).	Z019	02518	DEB	0.50	\$299.25
01/26/2023	Review and revise investment motion.	Z019	02062	MC2	0.40	\$239.40
01/26/2023	E-mails with E. Rosen and D. Barney re: assembling, redacting and filing investment motion.	Z019	02062	MC2	0.10	\$59.85
01/26/2023	Telephone call with H. Owen at Wilmington Trust re: Escrow Agreement.	Z019	02062	MC2	0.10	\$59.85
01/26/2023	Drafting Investment Motion.	Z019	02062	MC2	2.60	\$1,556.10
01/26/2023	E-mails with L. Misner at M&T Financial re: T-Bill fee structure for Investment Motion.	Z019	02062	MC2	0.10	\$59.85
01/26/2023	Confer with D. Barney re: Investment Motion.	Z019	02062	MC2	0.20	\$119.70
01/27/2023	Review emails re: investor inquiry on interest yield.	Z019	02518	DEB	0.20	\$119.70
01/27/2023	Final review of motion to approve Wilmington Trust escrow agreement and emails re: same.	Z019	02518	DEB	1.60	\$957.60
01/27/2023	Telephone calls with E. Rosen re: Investment Motion.	Z019	02062	MC2	0.10	\$59.85
01/27/2023	Revisions to investment motion and proposed form of order (0.1); e-mails with D. Barney and E. Rosen re: same (0.1).	Z019	02062	MC2	0.20	\$119.70
01/27/2023	E-mails with D. Porteous re: inquiry from investor.	Z019	02062	MC2	0.10	\$59.85
01/27/2023	Prepare Investment Motion for electronic filing (0.8); file and serve same (0.1); review and receipt of as-filed version (0.1); coordinate service (0.1); confer and email with team re: same (0.2).	Z019	26059	ER	1.30	\$356.85
01/30/2023	Researched and retrieved Island Bum and real property in Texas information as per M. Conlan.	Z019	40027	RT1	0.80	\$212.00

Gibbons P.C.

Time Detail

Run Date: 4/26/2023

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
01/31/2023	Add latest Quarterly Status Report to mediatrixreceivership.com website.	Z019	26059	ER	0.30	\$82.35
02/02/2023	Email with developer re: mediatrixreceivership.com website down.	Z019	26059	ER	0.10	\$27.45
02/07/2023	E-mails with E. Rosen and D. Barney re: unopposed investment motion.	Z019	02062	MC2	0.10	\$59.85
02/08/2023	Draft email to chambers re: Investment Motion (0.1); confer and email with team re: same (0.1)	Z019	26059	ER	0.20	\$54.90
02/14/2023	Telephone call with E. Rosen re: investment motion.	Z019	02062	MC2	0.20	\$119.70
02/14/2023	Confer with M. Conlan re: status of Order on Investment Motion (0.1); email with chambers re: same (0.1); review and receipt of entered order on Investment Motion (0.1).	Z019	26059	ER	0.30	\$82.35
02/15/2023	Emails to/from M. Conlan and H. Owen (Wilmington Trust) re: transfer of estate funds from East West Bank to Wilmington Trust and final Escrow Agreement.	Z019	02518	DEB	0.30	\$179.55
02/15/2023	Final review and signature of Wilmington Trust Escrow Agreement (1,2); deliver same to Wilmington Trust (0.1).	Z019	02062	MC2	1.30	\$778.05
02/15/2023	Review entered order on Investment Motion (0.1); email with team re: same (0.1).	Z019	26059	ER	0.20	\$54.90
02/22/2023	Post recent significant filings to mediatrixreceivership.com; email with team re: same.	Z019	26059	ER	0.60	\$164.70
02/27/2023	Review e-mail from D. Barney re: FOREX trades.	Z019	02062	MC2	0.10	\$59.85
03/02/2023	Attend meeting with Wilmington Trust representatives and M. Conlan re: T-Bill purchase structure and mechanics.	Z019	02518	DEB	0.60	\$359.10
03/03/2023	Emails re: Wilmington Trust T-Bill investments.	Z019	02518	DEB	0.50	\$299.25
03/08/2023	Detailed response to investor regarding claims procedure inquiry.	Z019	26059	ER	0.20	\$54.90
03/09/2023	Email with investor and M. Conlan re: further investor inquiry.	Z019	26059	ER	0.10	\$27.45
03/14/2023	Review emails from Wilmington Trust and M. Conlan re: T-Bill purchases.	Z019	02518	DEB	0.30	\$179.55
03/14/2023	Legal research on scope of FDIC insurance coverage.	Z019	02062	MC2	0.30	\$179.55
03/16/2023	Post Order Granting 5th Quarterly Fee Application for Q4 2022 to mediatrixreceivership.com website.	Z019	26059	ER	0.20	\$54.90
03/22/2023	Legal research on securing deposit accounts.	Z019	02062	MC2	0.30	\$179.55
03/23/2023	Legal research on FDIC deposit insurance coverage.	Z019	02062	MC2	0.20	\$119.70
03/23/2023	Confer with M. Conlan re: potential website enhancement [0.1]; review website sample [0.2]; detailed email with developer re: same [0.3].	Z019	26059	ER	0.60	\$164.70
03/27/2023	Confer and email with team re: mediatrixreceivership.com modification.	Z019	26059	ER	0.10	\$27.45
03/28/2023	Telephone call with P. Ulrich re: FAQ page for mediatrixreceivership.com.	Z019	02062	MC2	0.10	\$59.85
03/28/2023	Working on FAQ sheet for website.	Z019	02062	MC2	1.30	\$778.05
03/28/2023	Review FAQ's for Receivership website.	Z019	02548	DC	0.10	\$59.85
03/28/2023	Email with M. Miller re: adding FAQs to receivership website [0.1]; draft potential list of questions for FAQs [0.6]; email with team re: same [0.1].	Z019	26059	ER	0.90	\$247.05
03/29/2023	Revise investor FAQ for receivership website.	Z019	02518	DEB	0.40	\$239.40
03/29/2023	Working on FAQ page for website.	Z019	02062	MC2	0.30	\$179.55
03/30/2023	Working on FAQ page for website.	Z019	02062	MC2	0.40	\$239.40
03/30/2023	Review and analyze corporate resolution form from Connect One Bank (0.2); confer with P. Ulrich and R. Danylchuk re: same (0.1); e-mails with Connect One Bank re: same (0.2).	Z019	02062	MC2	0.50	\$299.25
03/30/2023	E-mails with Connect One Bank re: need for corporate resolution to open account.	Z019	02062	MC2	0.10	\$59.85
03/30/2023	Review various pleadings for FAQ and website information.	Z019	02062	MC2	0.90	\$538.65
03/30/2023	Review pleadings for FAQ.	Z019	02062	MC2	0.20	\$119.70
03/31/2023	Edits to FAQ page of website.	Z019	02062	MC2	0.10	\$59.85
03/31/2023	Detailed email with team re: mediatrixreceivership.com FAQs.	Z019	26059	ER	0.10	\$27.45
	Sub-Total For Task: Z019 Business Operations				48.40	\$26,346.20
02/15/2023	Email with team re: Robb Evans contact information; email J. Curtis re: same.	Z020	26059	ER	0.10	\$27.45
	Sub-Total For Task: Z020 Case Administration				0.10	\$27.45

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Gibbons P.C.Time Detail
Run Date: 4/26/2023

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
01/04/2023	E-mails with D. Crapo and M. Conforti re: individual broker avoidance claim.	Z021	02062	MC2	0.10	\$59.85
01/05/2023	E-mails with M. Conforti and D. Crapo re: resolution of open avoidance claims.	Z021	02062	MC2	0.30	\$179.55
01/18/2023	E-mails and telephone call with SEC counsel re: broker claims.	Z021	02062	MC2	0.20	\$119.70
01/19/2023	Prepare for conference call with SEC team re: broker claims.	Z021	02062	MC2	0.10	\$59.85
02/02/2023	E-mails with D. Crapo re: status of claims against asset freeze violators.	Z021	02062	MC2	0.10	\$59.85
02/02/2023	Confer with D. Crapo re: asset freeze violation claims.	Z021	02062	MC2	0.20	\$119.70
02/13/2023	Review e-mail from N. Edwards re: mortgage claims against Delmonden Farm; e-mails with M. Conforti and D. Crapo re: same.	Z021	02062	MC2	0.10	\$59.85
03/22/2023	E-mails with J. Curtis re: investor claims.	Z021	02062	MC2	0.10	\$59.85
03/23/2023	E-mails with team re: claims process.	Z021	02062	MC2	0.20	\$119.70
03/23/2023	Review e-mails between various parties re: investor lists in preparation for a bar date.	Z021	02548	DC	0.20	\$119.70
03/24/2023	Telephone call with Tracy Ashmore re: calculating investor losses.	Z021	02062	MC2	0.30	\$179.55
03/24/2023	Telephone call with D. Barney re: investors losses.	Z021	02062	MC2	0.20	\$119.70
03/24/2023	E-mails with J. Curtis and D. Barney re: investor losses.	Z021	02062	MC2	0.20	\$119.70
03/24/2023	Review and analyze potential investor claims (0.2); e-mails with D. Barney and J. Curtis re: same (0.2).	Z021	02062	MC2	0.40	\$239.40
03/24/2023	Review e-mails between various parties re: investor lists in preparation for a bar date motion.	Z021	02548	DC	0.20	\$119.70
03/30/2023	E-mails with SEC team and D. Barney re: claims procedure motion and FAQ page.	Z021	02062	MC2	0.10	\$59.85
03/31/2023	Prepare rough claims analysis (0.2); e-mails with D. Barney and M. Conforti re: same (0.2).	Z021	02062	MC2	0.40	\$239.40
03/31/2023	Prepare for call with SEC team re: claims procedures motion.	Z021	02062	MC2	0.50	\$299.25
03/31/2023	Telephone call with D. Barney re: claims analysis.	Z021	02062	MC2	0.30	\$179.55
03/31/2023	Telephone call with M. Conforti and D. Whitford re: access to database for claims process.	Z021	02062	MC2	0.20	\$119.70
03/31/2023	E-mails with J. Curtis re: claims process.	Z021	02062	MC2	0.10	\$59.85
03/31/2023	Legal research on claims procedures.	Z021	02062	MC2	0.20	\$119.70
03/31/2023	Telephone call with E. Rosen re: claims procedure motion.	Z021	02062	MC2	0.30	\$179.55
03/31/2023	Teams call with D. Barney and SEC Counsel re: claims procedures motion (0.2) and FAQs (0.2).	Z021	02062	MC2	0.40	\$239.40
03/31/2023	Confer with team re: subscription agreements and potential claims protocols.	Z021	26059	ER	0.50	\$137.25
Sub-Total For Task: Z021 Claims Administration and Objections					5.90	\$3,369.15
01/06/2023	E-mails and telephone call with E. Rosen re: application to retain local counsel.	Z023	02062	MC2	0.10	\$59.85
01/06/2023	Email and confer with team re: status of pending Unopposed Order to Employ Local Counsel.	Z023	26059	ER	0.10	\$27.45
01/11/2023	Email to chambers and Courtroom Deputy re: proposed order on Motion to Employ Local Counsel (0.2); review and receipt of entered Order on Motion to Employ Local Counsel (0.1).	Z023	26059	ER	0.30	\$82.35
Sub-Total For Task: Z023 Employment Applications					0.50	\$169.65
01/06/2023	Telephone call with E. Rosen re: Q4 fee application.	Z025	02062	MC2	0.10	\$59.85
01/27/2023	Attend to Q4 fee application.	Z025	02062	MC2	0.10	\$59.85
02/02/2023	Telephone call and e-mails with E. Rosen re: Q4 fee application.	Z025	02062	MC2	0.10	\$59.85
02/02/2023	Draft 5th Quarterly Fee Application for Q4 2022 (1.6); prepare exhibits for same for filing (0.4); email and confer with team re: same (0.2).	Z025	26059	ER	2.20	\$603.90
02/03/2023	Emails re: description of prime broker claims for fee application.	Z025	02518	DEB	0.20	\$119.70
02/03/2023	Review and revise Q4 fee application.	Z025	02062	MC2	0.50	\$299.25
02/03/2023	Fee Application Preparation.	Z025	02548	DC	0.20	\$119.70
02/03/2023	Draft portions of 5th Quarterly Fee Application for Q4 2022 (1.6); prepare exhibits for same for electronic filing (0.5); docket UFTA SOL deadline (0.1); email with team re: same (0.2).	Z025	26059	ER	2.40	\$658.80

Gibbons P.C.

Time Detail

Run Date: 4/26/2023

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
02/06/2023	Fee Application preparation.	Z025	02548	DC	0.20	\$119.70
02/07/2023	Review and revise Fifth Interim (Q4 2022) Fee Application.	Z025	02062	MC2	0.80	\$478.80
02/07/2023	Review and revise proposed form of order and declarations in support of Fifth Quarterly Fee Application (Q4 2022) .	Z025	02062	MC2	0.30	\$179.55
02/07/2023	Telephone call with E. Rosen re: Fifth Quarterly Fee Application (Q4 2022) .	Z025	02062	MC2	0.10	\$59.85
02/07/2023	Fee Application Preparation.	Z025	02548	DC	0.20	\$119.70
02/07/2023	Prepare 5th Quarterly Fee Application for Q4 2022 for submission to SEC Counsel (0.1); draft declarations in support of Application (0.3); draft proposed order re: Application (0.2); prepare exhibits for electronic filing (0.1) email and confer with team re: same (0.1)	Z025	26059	ER	0.80	\$219.60
02/08/2023	Prepare 5th Quarterly Fee Application with Declarations, Exhibits, and Proposed Order for submission to SEC counsel for comment and approval.	Z025	26059	ER	0.50	\$137.25
02/15/2023	E-mails with SEC team re: Q4 2022 fee application.	Z025	02062	MC2	0.10	\$59.85
02/16/2023	Telephone calls and e-mails re: Q4 fee application (Q4 2022).	Z025	02062	MC2	0.20	\$119.70
02/16/2023	E-mails with E. Rosen and D. Crapo re: Q4 fee app.	Z025	02062	MC2	0.10	\$59.85
02/16/2023	Prepare 5th Quarterly Fee Application, Declaration, Exhibits, and Proposed Order for electronic filing.	Z025	26059	ER	0.20	\$54.90
02/17/2023	Fee Application preparation.	Z025	02548	DC	0.30	\$179.55
02/17/2023	Prepare 5th Quarterly Fee Application for Q4 2022, Declarations in Support with exhibits, and Proposed Order for electronic filing.	Z025	26059	ER	0.30	\$82.35
02/21/2023	Final review of most recent fee application.	Z025	02548	DC	0.10	\$59.85
02/21/2023	Further updates to 5th Quarterly Fee Application for Q4 2022, Declarations in Support with exhibits, and Proposed Order in preparation for electronic filing (0.1); file and serve same (0.2); review and receipt of as-filed versions re: same (0.2); coordinate email and mail service of same (0.2); email with team re: same (0.1).	Z025	26059	ER	0.80	\$219.60
03/14/2023	Telephone call with E. Rosen re: submission of proposed form of order approving fee applications to Chambers.	Z025	02062	MC2	0.10	\$59.85
03/14/2023	Review proposed order approving Gibbons' and Receiver's fees.	Z025	02548	DC	0.10	\$59.85
03/14/2023	Confer with E. Rosen re: proposed order approving Gibbons' and Receiver's fees.	Z025	02548	DC	0.10	\$59.85
03/14/2023	Email chambers with Word copy of proposed order on 5th Quarterly Fee Application (0.1); confer and email with M. Conlan re: same (0.1).	Z025	26059	ER	0.20	\$54.90
03/15/2023	Review and receipt of Order Granting Receiver's Q4 2022 Fee Application and SEC Motion to Extend Time to Respond or Reply to Renewed Asset Freeze Motion [0.1]; email with team re: same [0.1].	Z025	26059	ER	0.20	\$54.90
03/20/2023	E-mails with Seattle local counsel re: fee application process.	Z025	02062	MC2	0.10	\$59.85
03/30/2023	Draft portions of Rate Motion (0.7); detailed email with team re: same (0.1).	Z025	26059	ER	0.80	\$219.60
	Sub-Total For Task: Z025 Fee Applications				12.40	\$4,699.80
01/03/2023	Reviewed broker defendant's financials and limited document production.	Z029	30541	MAC	0.50	\$204.75
01/03/2023	Consider next steps re: Asset Freeze Order violation claims.	Z029	02548	DC	0.20	\$119.70
01/03/2023	E-mail to broker and to/from M. Conforti re: Receiver's claim against broker and her husband.	Z029	02548	DC	0.30	\$179.55
01/04/2023	Emails regarding broker defendant complaint next steps.	Z029	30541	MAC	0.20	\$81.90
01/04/2023	Draft entry of default papers for one broker defendant.	Z029	30541	MAC	0.30	\$122.85
01/04/2023	Draft entry of default papers for a second broker defendant.	Z029	30541	MAC	0.50	\$204.75
01/04/2023	Draft entry of default papers for a third broker defendant.	Z029	30541	MAC	0.30	\$122.85
01/04/2023	Reviewed document production from broker defendant with counsel for the Receiver.	Z029	30541	MAC	0.60	\$245.70
01/04/2023	Telephone call with T. Ashmore and D. Crapo re: avoidance action collections.	Z029	02062	MC2	0.30	\$179.55
01/04/2023	Confer with M. Conforti re: status of broker and net winner avoidance actions.	Z029	02062	MC2	0.20	\$119.70
01/04/2023	E-mails with D. Crapo re: net winner and broker actions.	Z029	02062	MC2	0.10	\$59.85
01/04/2023	Confer with R. Malone re: prime broker claims.	Z029	02062	MC2	0.20	\$119.70
01/04/2023	Review and respond to e-mails from M. Conlan and M. Conforti re: avoidance claims.	Z029	02548	DC	0.30	\$179.55

Gibbons P.C.

Time Detail
Run Date: 4/26/2023

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
01/04/2023	Review proof of service on K8EDW and Asset Management.	Z029	02548	DC	0.10	\$59.85
01/04/2023	Review and respond to e-mail from individual broker defendant re: Receiver's claim against her.	Z029	02548	DC	0.10	\$59.85
01/04/2023	Review/analyze e-mail from broker's husband re: Receiver's claim against broker.	Z029	02548	DC	0.20	\$119.70
01/04/2023	E-mails to/from M. Conforti and M. Conlan re: analysis of Receiver's claim against broker.	Z029	02548	DC	0.40	\$239.40
01/04/2023	Review and analyze documentation provided by broker in response to Receiver's claim against him.	Z029	02548	DC	1.40	\$837.90
01/04/2023	Draft and transmit to M. Conlan and M. Conforti analysis of Receiver's claim against broker and recommendation concerning settlement of claim.	Z029	02548	DC	0.40	\$239.40
01/04/2023	Prepare Request for Entry of Default papers for electronic filing against three broker defendants [0.4]; file and serve same [0.4]; review and receipt of as-filed versions of same [0.1]; coordinate service of same [0.1]; update broker chart to reflect same [0.1]; email and confer with team re: same [0.1].	Z029	26059	ER	1.40	\$384.30
01/05/2023	Review and substantiated accountant's analysis of broker defendant's document production.	Z029	30541	MAC	1.20	\$491.40
01/05/2023	Reviewed and analyzed broker defendant's position and defenses shared with counsel for the Receiver.	Z029	30541	MAC	0.70	\$286.65
01/05/2023	Review documents produced by Net Winner.	Z029	30541	MAC	0.30	\$122.85
01/05/2023	Review and respond to e-mails (and attachments) from M. Conlan and M. Conforti re: Receiver's claim against Buy Investment Property.	Z029	02548	DC	0.30	\$179.55
01/05/2023	Confer with M. Conlan re: Receiver's claims against brokers, net winners and prime broker.	Z029	02548	DC	0.10	\$59.85
01/05/2023	Review RMA analysis of Mercury Alternative defenses to Receiver's claim and M. Conforti's e-mail to Mercury Alternative's counsel re: settlement proposal.	Z029	02548	DC	0.30	\$179.55
01/05/2023	E-mails to M. Conforti and from M. Conlan re negotiations concerning resolution of Receiver's claims against brokers.	Z029	02548	DC	0.30	\$179.55
01/06/2023	Telephone call with R. Malone and M. Pompeo re: claims against prime broker.	Z029	02062	MC2	0.20	\$119.70
01/09/2023	Call with broker defendant to discuss settlement.	Z029	30541	MAC	0.20	\$81.90
01/09/2023	Confer internally with D Crapo to discuss broker defendant's settlement.	Z029	30541	MAC	0.20	\$81.90
01/09/2023	Emails with broker defendant discussing settlement.	Z029	30541	MAC	0.10	\$40.95
01/09/2023	Emails with Net Winner discussing settlement.	Z029	30541	MAC	0.30	\$122.85
01/09/2023	Confer with M. Conforti and broker re: resolution of Receiver's claim.	Z029	02548	DC	0.30	\$179.55
01/09/2023	Follow up conference with M. Conforti to discuss strategy.	Z029	02548	DC	0.20	\$119.70
01/09/2023	Review e-mails from M. Conforti to individual broker defendant re: resolution of Receiver's claims.	Z029	02548	DC	0.10	\$59.85
01/09/2023	Review of and e-mail to M. Conforti re: settlement offer to Buy Investment Property.	Z029	02548	DC	0.20	\$119.70
01/09/2023	E-mail recommendation to M. Conlan re: settlement with broker.	Z029	02548	DC	0.20	\$119.70
01/09/2023	Update Broker chart to reflect entry of default; review and receipt of court notice re: same.	Z029	26059	ER	0.10	\$27.45
01/10/2023	Attend to e-mails with D. Crapo and M. Conforti re: settlement with individual broker.	Z029	02062	MC2	0.10	\$59.85
01/10/2023	E-mails with T. Ashmore, V. Drohan and SEC counsel re: Unopposed Motion to Extend Discovery Schedule.	Z029	02062	MC2	0.10	\$59.85
01/10/2023	Due diligence on K8EDW and Alternative Asset Management.	Z029	02062	MC2	0.80	\$478.80
01/10/2023	E-mails to/from M. Conforti and M. Conlan re: Receiver's claim against individual broker defendant.	Z029	02548	DC	0.10	\$59.85
01/10/2023	Telephone calls to/from Yaritza Mal-donado counsel for Parrocchia di San Antonio de Padua re: resolution of Receiver's claim.	Z029	02548	DC	0.10	\$59.85
01/10/2023	Review and analyze e-mail from proprietor of Asset Management and K8EDW re: Receiver's claims (0.1); consider response (0.1).	Z029	02548	DC	0.20	\$119.70
01/10/2023	E-mail analysis of broker defendant representative; e-mail to M. Conlan and M. Conforti re: same.	Z029	02548	DC	0.10	\$59.85
01/10/2023	Review e-mail re: resolution of Receiver's claim against Buy Investor Properties.	Z029	02548	DC	0.10	\$59.85
01/10/2023	Draft and transmit proposal re: settlement of Receiver's claim against broker.	Z029	02548	DC	0.30	\$179.55

Time Detail
Run Date: 4/26/2023

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
01/10/2023	Review information concerning proprietor of Alternative Asset Management.	Z029	02548	DC	0.10	\$59.85
01/10/2023	E-mails to/from M. Conlan re: business activities of Alternative Asset Management and K8EDW proprietor.	Z029	02548	DC	0.10	\$59.85
01/11/2023	Confer with Yaritza Maldonado, counsel for Parocchia de San Antonio de Padua re: resolution of Receiver's claim.	Z029	02548	DC	0.20	\$119.70
01/12/2023	Emails with local counsel regarding Net Winner complaint.	Z029	30541	MAC	0.10	\$40.95
01/12/2023	Review Young's Unopposed Motion to Extend Case Deadlines.	Z029	02062	MC2	0.10	\$59.85
01/12/2023	E-mails to/from M. Conlan re: resolution of Receiver's claims against Parocchia de San Antonio de Padua, Archdiocese of Philadelphia and St. Charles Borromeo Seminary.	Z029	02548	DC	0.20	\$119.70
01/12/2023	Review and receipt of Defendant Youngs' Unopposed Motion to Extend Case Deadlines; email with team re: same.	Z029	26059	ER	0.10	\$27.45
01/13/2023	Emails regarding Motion for Default Judgment against Broker Defendant.	Z029	30541	MAC	0.10	\$40.95
01/13/2023	Emails regarding service of Net Winner complaint.	Z029	30541	MAC	0.20	\$81.90
01/13/2023	E-mails to/from Buy Property Investment re: resolution of Receiver's claim.	Z029	02548	DC	0.20	\$119.70
01/13/2023	Confer with attorney Yaritza Maldonado re: resolution of Receiver's claim against Parrocchia de San Antonio de Padua.	Z029	02548	DC	0.10	\$59.85
01/13/2023	Review and redact broker default judgment exhibits [0.8]; confer with team re: same [0.1].	Z029	26059	ER	0.90	\$247.05
01/16/2023	Emails regarding two Broker Defendant complaints.	Z029	30541	MAC	0.10	\$40.95
01/16/2023	E-mails from proprietor of K8EDW and Alternative Management to/from M. Conlan and M. Conforti re: resolution of Receiver's claims.	Z029	02548	DC	0.10	\$59.85
01/17/2023	Began drafting Motion for Default Judgment as to one Broker Defendant.	Z029	30541	MAC	1.10	\$450.45
01/17/2023	Confer with Receiver regarding Broker Defendant complaints.	Z029	30541	MAC	0.10	\$40.95
01/17/2023	Telephone call with M. Conforti re: Alternative Asset Management and K8EDW; e-mails with SEC team re: same.	Z029	02062	MC2	0.10	\$59.85
01/17/2023	E-mails to/from counsel Yaitza Maldonado re: settlement of Receiver's claim against Parrocchia de San Antonio de Padua.	Z029	02548	DC	0.20	\$119.70
01/17/2023	E-mails to/from M. Conlan re: third party request for information and resolution of Receivership claims.	Z029	02548	DC	0.10	\$59.85
01/17/2023	Review e-mails from M. Conforti re: Receiver's claims against various parties.	Z029	02548	DC	0.10	\$59.85
01/17/2023	Continue review, redact and preparation of broker default judgment exhibits (178 pages) (0.9); email and confer with team re: same (0.1)	Z029	26059	ER	1.00	\$274.50
01/17/2023	Review broker bank statements for asset violator mentions (0.1); email with team re: same (0.1).	Z029	26059	ER	0.20	\$54.90
01/18/2023	Conference with M. Conlan and Faegre Drinker team re: Receiver's claims against prime broker.	Z029	02518	DEB	0.80	\$478.80
01/18/2023	Review documents related to settlement discussions with Net Winner.	Z029	30541	MAC	0.30	\$122.85
01/18/2023	Completed initial draft of motion for default judgment papers against Broker Defendant.	Z029	30541	MAC	2.30	\$941.85
01/18/2023	Emails to Broker Defendants regarding settlement talks.	Z029	30541	MAC	0.30	\$122.85
01/18/2023	Emails to Net Winner regarding settlement talks.	Z029	30541	MAC	0.10	\$40.95
01/18/2023	Final edits and revisions with local counsel, for purposes of finalizing Net Winner complaint.	Z029	30541	MAC	0.20	\$81.90
01/18/2023	Conference call with Drinker team re: claims against prime broker.	Z029	02062	MC2	0.80	\$478.80
01/18/2023	Review draft complaint against broker; telephone call with M. Conforti re: same.	Z029	02062	MC2	0.10	\$59.85
01/18/2023	Confer with E. Rosen re: document productions by Equiti and SEC.	Z029	02548	DC	0.20	\$119.70
01/18/2023	Review e-mails from M. Conforti re: resolution of Receiver's claims against various parties.	Z029	02548	DC	0.30	\$179.55
01/18/2023	Continue review of Equiti document production.	Z029	02548	DC	1.80	\$1,077.30
01/18/2023	E-mail to E. Rosen re: Equiti document production.	Z029	02548	DC	0.10	\$59.85
01/18/2023	Review and receipt of defendant corporate documentation (0.3); review and receipt of commission reports (0.2); confer with team re: same (0.3).	Z029	26059	ER	0.80	\$219.60
01/18/2023	Review and receipt of local counsel revised engagement letter, signed version of same (0.1); email with team re: same (0.1).	Z029	26059	ER	0.20	\$54.90

Time Detail
Run Date: 4/26/2023

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
01/19/2023	Finalize Default Judgment papers in Broker Defendant action, and effected filing of same.	Z029	30541	MAC	0.20	\$81.90
01/19/2023	Confer with E. Rosen regarding scheduling order.	Z029	30541	MAC	0.30	\$122.85
01/19/2023	Prepare for call with SEC staff.	Z029	30541	MAC	0.50	\$204.75
01/19/2023	Confer with SEC regarding Broker Defendant.	Z029	30541	MAC	0.30	\$122.85
01/19/2023	Telephone call with M. Conforti re: avoidance claims against Alternative Asset Management and K8EDW.	Z029	02062	MC2	0.20	\$119.70
01/19/2023	E-mail from E. Rosen re: document productions by Equiti and SEC.	Z029	02548	DC	0.10	\$59.85
01/19/2023	Continue review of Equiti document production.	Z029	02548	DC	4.80	\$2,872.80
01/19/2023	Prepare default judgment motion, certifications with exhibits, and proposed order for electronic filing (0.5); file and serve same (0.2); review and receipt of as-filed versions (0.1); coordinate mail service to defendant (0.1); confer email with team re: same (0.1); docket deadline (0.1).	Z029	26059	ER	1.10	\$301.95
01/19/2023	Draft email to chambers re: status of case and scheduling conference (0.5); confer and email with M. Conforti re: same (0.2).	Z029	26059	ER	0.70	\$192.15
01/20/2023	Emails to Broker Defendant.	Z029	30541	MAC	0.30	\$122.85
01/20/2023	E-mails with M. Conforti and E. Rosen re: engaging skip tracer in Washington State.	Z029	02062	MC2	0.10	\$59.85
01/20/2023	Attending to e-mails with N. Shea and M. Conforti re: net winner settlement payment.	Z029	02062	MC2	0.10	\$59.85
01/20/2023	Review e-mails between M. Conlan, M. Conforti and E. Rosen re: Receiver's claim against individual broker defendant.	Z029	02548	DC	0.10	\$59.85
01/20/2023	Review e-mails between M. Conforti and Net Winner re: Receiver's claim against Buy Property Investors.	Z029	02548	DC	0.20	\$119.70
01/20/2023	Review e-mails between M. Conforti and various parties re: Receiver's claim against brokers.	Z029	02548	DC	0.20	\$119.70
01/20/2023	Review information concerning status of brokers Alternative Asset Management and K8EDW.	Z029	02548	DC	0.10	\$59.85
01/20/2023	Review e-mail and settlement proposal from individual broker defendant.	Z029	02548	DC	0.20	\$119.70
01/20/2023	E-mails to/from M. Conlan and M. Conforti re; resolution of Receiver's claim against individual broker defendant.	Z029	02548	DC	0.20	\$119.70
01/20/2023	Email with M. Rinsky re: skip trace for elusive defendant (0.1); email with team re: same (0.1).	Z029	26059	ER	0.20	\$54.90
01/23/2023	Research re: Certificate of Documentation for M/V Currenseas (0.9); emails to/from J. Deckenbach re: same (0.2).	Z029	02518	DEB	1.10	\$658.35
01/23/2023	Emails regarding Broker Complaint and scheduling order.	Z029	30541	MAC	0.30	\$122.85
01/23/2023	Emails with Broker Defendant's counsel regarding settlement.	Z029	30541	MAC	0.10	\$40.95
01/23/2023	Emails regarding Net Winner complaint and settlement.	Z029	30541	MAC	0.10	\$40.95
01/23/2023	E-mails with D. Crapo re: charity settlement.	Z029	02062	MC2	0.10	\$59.85
01/23/2023	Due diligence on written disclosures from Alternative Asset Management and K8EDW (1.8); e-mails with D. Crapo and M. Conforti re: same (0.4).	Z029	02062	MC2	2.20	\$1,316.70
01/23/2023	Review e-mail from counsel re: resolution of Receiver's claim against Y-Man.	Z029	02548	DC	0.10	\$59.85
01/23/2023	E-mails to/from counsel, Yaitza Maldonado, re: resolution of Receiver's claim against Parrochia de San Antonio de Padua.	Z029	02548	DC	0.20	\$119.70
01/23/2023	Review and analyze information provided by representative of Alternative Asset Management in response to Receiver's claim.	Z029	02548	DC	0.60	\$359.10
01/23/2023	E-mail recommendation to M. Conlan and M. Conforti.	Z029	02548	DC	0.10	\$59.85
01/23/2023	E-mails to/from M. Conforti re: information provided by representative of Alternative Asset Management.	Z029	02548	DC	0.20	\$119.70
01/23/2023	Continue reviewing documents produced by Equiti.	Z029	02548	DC	1.30	\$778.05
01/23/2023	Monitor dockets (0.1); update broker defendant charts (0.1)	Z029	26059	ER	0.20	\$54.90
01/23/2023	Review email with chambers re: potential opposition to postponement of scheduling conference; confer with M. Conforti re: same.	Z029	26059	ER	0.10	\$27.45
01/24/2023	Confer with M. Conlan and R. Malone re: Receiver's claims against prime broker.	Z029	02518	DEB	0.50	\$299.25
01/24/2023	Review Coast Guard documentation procedure and emails to/from J. Deckenbach re: same re: M/V Currenseas.	Z029	02518	DEB	0.30	\$179.55

Time Detail
Run Date: 4/26/2023

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
01/24/2023	Attend to e-mails with M. Conforti re: avoidance actions against K8EDW and individual broker.	Z029	02062	MC2	0.10	\$59.85
01/24/2023	E-mails to/from M. Conforti re: resolution of Receiver's claim against individual broker defendant.	Z029	02548	DC	0.10	\$59.85
01/24/2023	E-mails to/from M. Conlan, M. Conforti and E. Rosen re: next steps in avoidance action against Alternative Asset Management and K8EDW.	Z029	02548	DC	0.10	\$59.85
01/25/2023	Research re: title to M/V Currenseas under Certificate of Documentation and review same.	Z029	02518	DEB	0.50	\$299.25
01/25/2023	Review e-mail concerning resolution of Receiver's claim against Buy Property Investments.	Z029	02548	DC	0.10	\$59.85
01/26/2023	Emails to/from J. Deckenbach re: M/V Currenseas bill of sale.	Z029	02518	DEB	0.20	\$119.70
01/26/2023	Review procedure for transferring title to documented vessel and email to US Coast Guard re: same.	Z029	02518	DEB	0.60	\$359.10
01/26/2023	Emails regarding upcoming interview with Broker Defendant.	Z029	30541	MAC	0.20	\$81.90
01/26/2023	Attend to e-mails with M. Conforti re: interview with Nick Edwards.	Z029	02062	MC2	0.20	\$119.70
01/26/2023	Review e-mail concerning resolution of Receiver's claim against Buy Property Investments.	Z029	02548	DC	0.10	\$59.85
01/26/2023	E-mails to/from M. Conlan and M. Conforti re: resolution of claim against broker.	Z029	02548	DC	0.30	\$179.55
01/26/2023	Review e-mails from M. Conforti re: resolution of Receiver's claim against Alternative Asset Management and K8EDW.	Z029	02548	DC	0.10	\$59.85
01/26/2023	Confer with individual broker defendant re: resolution of Receiver's claim against him.	Z029	02548	DC	0.20	\$119.70
01/26/2023	E-mails to/from M. Conlan and M. Conforti re: claims against Buy Property Investments.	Z029	02548	DC	0.20	\$119.70
01/26/2023	Confer with M. Conlan and M. Conforti re: examination of broker defendant.	Z029	02548	DC	0.10	\$59.85
01/27/2023	Emails to/from USCG and J. Deckenbach re: Transfer of documentation to M/V Currenseas.	Z029	02518	DEB	0.30	\$179.55
01/27/2023	Reviewed Broker Defendant's documents.	Z029	30541	MAC	1.60	\$655.20
01/27/2023	Interview-call with Broker Defendant.	Z029	30541	MAC	1.70	\$696.15
01/27/2023	Review and respond to e-mails from M. Conforti re: settlement proposal from broker defendant.	Z029	02062	MC2	0.20	\$119.70
01/27/2023	Prepare for conference call with principal of Alternative Asset Management and K8EDW re: resolution of Receiver's claim.	Z029	02548	DC	0.30	\$179.55
01/27/2023	Participate in conference call with M. Conforti and the principal of Alternative Asset Management and K8EDW re: resolution of Receiver's claim.	Z029	02548	DC	1.70	\$1,017.45
01/27/2023	Follow up e-mail to M. Conlan re: Alternative Asset Management and K8EDW claims.	Z029	02548	DC	0.10	\$59.85
01/27/2023	Confer with M. Conlan re: resolution of Receiver's claim against Alternative Asset Management and K8EDW.	Z029	02548	DC	0.10	\$59.85
01/27/2023	Draft e-mail to M. Conlan summarizing interview of representative of Alternative Asset Management.	Z029	02548	DC	0.30	\$179.55
01/27/2023	E-mail to broker re: resolution of Receiver's claim.	Z029	02548	DC	0.10	\$59.85
01/30/2023	Emails to/from J. Cunningham and J. Deckenbach re: cruising permit for M/V Currenseas (0.3); research re: same; (1.2); emails to/from M. Conlan re: same (0.2); confer with M. Conlan re: same (0.2).	Z029	02518	DEB	1.90	\$1,137.15
01/30/2023	Draft settlement agreement for Net Winner.	Z029	30541	MAC	0.70	\$286.65
01/30/2023	Due diligence on Island Bums LLC (0.5); e-mails with T. Ashmore, Library, D. Barney and J. Deckenbach re: same (0.4).	Z029	02062	MC2	0.80	\$478.80
01/30/2023	Review e-mails with D. Crapo and T. Woods re: settlement.	Z029	02062	MC2	0.10	\$59.85
01/30/2023	Review M. Conforti's e-mail re: Receiver's claim against Buy Property Investments.	Z029	02548	DC	0.10	\$59.85
01/30/2023	Review and respond to e-mails from M. Conlan re: next steps in resolving Receiver's claims against Alternative Asset Management and K8EDW.	Z029	02548	DC	0.20	\$119.70
01/30/2023	Review and respond to broker e-mail re: resolution of Receiver's claim.	Z029	02548	DC	0.10	\$59.85
01/30/2023	E-mail to M. Conforti re: resolution of Receiver's claim against broker.	Z029	02548	DC	0.10	\$59.85
01/31/2023	Draft settlement agreement for Broker Defendant.	Z029	30541	MAC	0.30	\$122.85
01/31/2023	Confer with D. Crapo re: broker settlements.	Z029	02062	MC2	0.10	\$59.85

Gibbons P.C.

Time Detail

Run Date: 4/26/2023

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
01/31/2023	Review e-mail from B. Browne re: settlement and M. Conforti's response.	Z029	02548	DC	0.20	\$119.70
01/31/2023	Review e-mail re: settlement of Receiver's claim against Buy Investment Property.	Z029	02548	DC	0.10	\$59.85
01/31/2023	Review agreement with broker settling Receiver's claim.	Z029	02548	DC	0.10	\$59.85
01/31/2023	E-mails to/from M. Conforti re: settlement with broker.	Z029	02548	DC	0.10	\$59.85
01/31/2023	Confer with M. Conlan re: settlement of Receiver's claims against Alternative Asset Management and K8EDW.	Z029	02548	DC	0.10	\$59.85
01/31/2023	E-mail to broker representative re: resolution of Receiver's claims against Alternative Asset Management and K8EDW.	Z029	02548	DC	0.20	\$119.70
02/01/2023	Emails to/from J. Deckenbach re: M/V Currenseas title documents.	Z029	02518	DEB	0.50	\$299.25
02/01/2023	Telephone with J. Cunningham re: Tariff charge on Volvo outdrive for M/V Currenseas.	Z029	02518	DEB	0.30	\$179.55
02/01/2023	Telephone with Bayshore Marina re: delivery of M/V Currenseas and current amounts due for Marina charges.	Z029	02518	DEB	0.30	\$179.55
02/01/2023	Confer with M. Conlan re: M/V Currenseas status.	Z029	02518	DEB	0.20	\$119.70
02/01/2023	Conference with Faegre Drinker team and M. Conlan re: prime broker claims and confer with M. Conlan re: same.	Z029	02518	DEB	0.90	\$538.65
02/01/2023	Emails strategizing next steps on Broker Defendant complaint.	Z029	30541	MAC	0.20	\$81.90
02/01/2023	Attend to e-mails with M. Conforti and D. Crapo re: settlement with broker defendant.	Z029	02062	MC2	0.10	\$59.85
02/01/2023	Review e-mails with N. Edwards, M. Conforti and D. Crapo re: settlement.	Z029	02062	MC2	0.10	\$59.85
02/01/2023	Confer with M. Conforti and D. Crapo re: avoidance actions.	Z029	02062	MC2	0.30	\$179.55
02/01/2023	Conference call with Drinker team and D. Barney re: prime broker claims.	Z029	02062	MC2	0.70	\$418.95
02/01/2023	E-mail from Tyler Wood re: resolution of Receiver's claim.	Z029	02548	DC	0.10	\$59.85
02/01/2023	E-mails to/from Nicholas Edwards and from M. Conforti re: resolution of Receiver's claims against Alternative Asset Management and K8EDW.	Z029	02548	DC	0.20	\$119.70
02/01/2023	Confer with M. Conlan re: resolution of Receiver's claims against Alternative Asset management and K8EDW.	Z029	02548	DC	0.20	\$119.70
02/01/2023	Review and analyze e-mail from Byron Brown re: resolution of Receiver's claim against Y-Man.	Z029	02548	DC	0.20	\$119.70
02/01/2023	E-mails to/from M. Conforti and M. Conlan re: resolution of Receiver's claim against Y-Man.	Z029	02548	DC	0.20	\$119.70
02/02/2023	Review ATC Brokers decision (0.9); confer with M. Conlan re: same (0.3).	Z029	02518	DEB	1.20	\$718.20
02/02/2023	Legal research on claims against prime broker.	Z029	02062	MC2	1.50	\$897.75
02/02/2023	E-mail to M. Conforti re: settlement of Receiver's claim against Y-Man.	Z029	02548	DC	0.10	\$59.85
02/02/2023	Confer with M. Conlan re: claims against prime broker.	Z029	02548	DC	0.20	\$119.70
02/02/2023	Confer with M. Conlan re: potential claims against Asset Freeze Order violator.	Z029	02548	DC	0.20	\$119.70
02/02/2023	Update deadlines per latest Scheduling Order.	Z029	26059	ER	0.10	\$27.45
02/02/2023	Review and receipt of signed Broker Settlement Agreement; update chart re: same.	Z029	26059	ER	0.10	\$27.45
02/03/2023	Review email history re: sale of M/V Currenseas	Z029	02518	DEB	0.60	\$359.10
02/03/2023	Analyze ATC Brokers decision (0.7); email to D. Porteous re: same (0.1).	Z029	02518	DEB	0.80	\$478.80
02/03/2023	Attend to e-mails with D. Barney and D. Porteous re: prime broker claims.	Z029	02062	MC2	0.10	\$59.85
02/06/2023	Review e-mails between M. Conforti and counsel for persons against whom the Receiver asserts claims re: settlement.	Z029	02548	DC	0.20	\$119.70
02/07/2023	Review bill of sale and documentation transfer forms (0.8); review procedure for processing same with USCG - M/V Currenseas (0.8).	Z029	02518	DEB	1.60	\$957.60
02/07/2023	Emails re: Equiti document production.	Z029	02518	DEB	0.40	\$239.40
02/07/2023	E-mails with D. Barney re: document production from prime broker.	Z029	02062	MC2	0.10	\$59.85
02/07/2023	Review e-mails between M. Conforti and counsel for persons against whom the Receiver asserts claims re: settlement.	Z029	02548	DC	0.10	\$59.85
02/07/2023	Confer with Matthew Gray re: resolution of Receiver's claim.	Z029	02548	DC	0.20	\$119.70
02/07/2023	E-mail to D. Barney re: Equiti documents.	Z029	02548	DC	0.10	\$59.85
02/07/2023	Review e-mail from Asim Ali re: resolution of Receiver's claim against Buy Investment Property.	Z029	02548	DC	0.10	\$59.85
02/07/2023	Review e-mail from Tyler Wood re: resolution of Receiver's claim.	Z029	02548	DC	0.10	\$59.85

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Gibbons P.C.

Time Detail
Run Date: 4/26/2023

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
02/07/2023	Confer with M. Conlan re: prime broker claims and related documents.	Z029	02548	DC	0.20	\$119.70
02/07/2023	Email with M. Conlan re: document production.	Z029	26059	ER	0.10	\$27.45
02/08/2023	Emails to/from J. Cunningham re: tariff duty on Volvo outdrive for M/V Currenseas.	Z029	02518	DEB	0.30	\$179.55
02/08/2023	Confer with M. Conlan re: prime broker claims and Faegre Drinker Representation.	Z029	02518	DEB	0.40	\$239.40
02/08/2023	Drafted settlement agreement for Broker Defendant's review.	Z029	30541	MAC	0.30	\$122.85
02/08/2023	Drafted separate settlement agreement for separate Broker Defendant's review.	Z029	30541	MAC	0.20	\$81.90
02/08/2023	Emails with Net Winner regarding settlement.	Z029	30541	MAC	0.20	\$81.90
02/08/2023	Confer with D. Barney re: retention of Faegre Drinker and prime broker contract.	Z029	02062	MC2	0.20	\$119.70
02/08/2023	E-mails with Faegre Drinker team re: engagement terms.	Z029	02062	MC2	0.20	\$119.70
02/08/2023	Review e-mails between M. Conforti and counsel for persons against whom the Receiver asserts claims re: settlement.	Z029	02548	DC	0.20	\$119.70
02/08/2023	Confer with M. Conlan re: Equiti document production.	Z029	02548	DC	0.10	\$59.85
02/08/2023	Continue review of documents produced by Equiti	Z029	02548	DC	3.40	\$2,034.90
02/09/2023	Review Equiti document production.	Z029	02518	DEB	2.40	\$1,436.40
02/09/2023	Attention to Broker Defendant default matter.	Z029	30541	MAC	0.50	\$204.75
02/09/2023	Confer with M. Conforti re: Phenom Ventures matter.	Z029	02062	MC2	0.10	\$59.85
02/09/2023	Confer with M. Conlan re: Equiti document production.	Z029	02548	DC	0.10	\$59.85
02/09/2023	Continue review of documents produced by Equiti.	Z029	02548	DC	1.70	\$1,017.45
02/09/2023	Emails to/from Rene Amaya re: resolution of Receiver's claim against Phenom ventures.	Z029	02548	DC	0.10	\$59.85
02/09/2023	E-mail to M. Conforti re: same	Z029	02548	DC	0.10	\$59.85
02/09/2023	Confer with M. Conforti re: same.	Z029	02548	DC	0.10	\$59.85
02/09/2023	Review and receipt of documentation of settlement payment.	Z029	26059	ER	0.10	\$27.45
02/09/2023	Review data to document estimate of default judgment costs (0.3); email with team re: same (0.1).	Z029	26059	ER	0.40	\$109.80
02/10/2023	Draft Form CG-1258 Application for Certificate of Documentation for M/V Currenseas (1.2); emails to/from M. Conlan and J. Cunningham re: same (0.3).	Z029	02518	DEB	1.50	\$897.75
02/10/2023	Continue review of documents produced by Equiti.	Z029	02548	DC	4.60	\$2,753.10
02/10/2023	Begin summary and analysis of documents produced by Equiti.	Z029	02548	DC	1.70	\$1,017.45
02/10/2023	Review data to estimate judgment costs (0.6); email and confer with team re: same (0.3).	Z029	26059	ER	0.90	\$247.05
02/11/2023	Continue summary and analysis of documents produced by Equiti	Z029	02548	DC	1.80	\$1,077.30
02/13/2023	Revised application for certificate of documentation of M/V Currenseas and letter to US Coast Guard re: same.	Z029	02518	DEB	1.30	\$778.05
02/13/2023	Emails with Broker Defendant regarding default judgment motion and settlement.	Z029	30541	MAC	0.20	\$81.90
02/13/2023	Emails with Net Winners regarding settlement.	Z029	30541	MAC	0.30	\$122.85
02/13/2023	Attention to Joint Status Report in the second Broker Complaint action.	Z029	30541	MAC	0.30	\$122.85
02/13/2023	Draft stipulation of dismissal for Broker Defendant is second Broker Complaint action.	Z029	30541	MAC	0.20	\$81.90
02/13/2023	Continue review, analysis and summary of documents produced by Equiti.	Z029	02548	DC	6.30	\$3,770.55
02/13/2023	Review Ross mortgage on Nicholas & Katherine Edwards' farm (0.1); e-mails with M. A. Conforti re: same (0.1).	Z029	02548	DC	0.30	\$179.55
02/13/2023	Prepare Notice of Dismissal of Defendant Wood in Conlan v. K8EDW for electronic filing; file and serve same; email with team re: same.	Z029	26059	ER	0.10	\$27.45
02/14/2023	Final review of application for certificate of documentation for M/V Currenseas.	Z029	02518	DEB	0.50	\$299.25
02/14/2023	Continue review, analysis and summary of documents produced by Equiti.	Z029	02548	DC	6.10	\$3,650.85
02/15/2023	Email to SEC Counsel re: Equiti platform mechanics.	Z029	02518	DEB	0.20	\$119.70
02/15/2023	Confer with M. Conlan and Faegre Drinker team re: Receiver's claims against prime broker.	Z029	02518	DEB	0.80	\$478.80
02/15/2023	Review Final Wilmington Trust Escrow Agreement.	Z029	02518	DEB	0.60	\$359.10
02/15/2023	Prepare for meeting with Faegre Drinker re: prime broker claims.	Z029	02518	DEB	0.70	\$418.95

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Gibbons P.C.

Time Detail
Run Date: 4/26/2023

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
02/15/2023	Draft settlement agreement for Broker Defendant.	Z029	30541	MAC	0.50	\$204.75
02/15/2023	Confer with E. Rosen regarding Broker Defendant default.	Z029	30541	MAC	0.50	\$204.75
02/15/2023	Emails with Broker Defendant regarding hardship documents shared.	Z029	30541	MAC	0.30	\$122.85
02/15/2023	Teams call with Faegre Drinker team and D. Barney re: prime broker retention.	Z029	02062	MC2	0.70	\$418.95
02/15/2023	Confer with D. Crapo and D. Barney re: claims against prime broker; e-mails with D. Porteous and J. Volling re: same.	Z029	02062	MC2	0.30	\$179.55
02/15/2023	E-mails with Drinker team re: call on prime broker claims.	Z029	02062	MC2	0.10	\$59.85
02/15/2023	Continue review, analysis and summary of documents produced by Equiti.	Z029	02548	DC	5.30	\$3,172.05
02/15/2023	Review e-mails between M. Conforti and Nicholas Edwards and Aaron Lukken re: UK real estate issues.	Z029	02548	DC	0.30	\$179.55
02/15/2023	Review and redact default exhibit against Broker (0.6); confer and email with team re: same (0.1).	Z029	26059	ER	0.70	\$192.15
02/16/2023	Research procedure for obtaining cruising permit for M/V Currenseas and create application.	Z029	02518	DEB	0.80	\$478.80
02/16/2023	Emails to/from J. Cunningham re: cruising permit for M/V Currenseas and duty on outdrive unit.	Z029	02518	DEB	0.50	\$299.25
02/16/2023	Emails re: wire of funds into escrow.	Z029	02518	DEB	0.30	\$179.55
02/16/2023	Emails with Net Winner discussing settlement.	Z029	30541	MAC	0.30	\$122.85
02/16/2023	Confer with M. Conlan re: privacy issue.	Z029	02548	DC	0.20	\$119.70
02/16/2023	Review records to calculate estimated fees and costs related to Net Winner complaint [0.7]; detailed email with team re: same [0.1].	Z029	26059	ER	0.80	\$219.60
02/17/2023	Review Equiti/Blue Isle contracts.	Z029	02518	DEB	1.70	\$1,017.45
02/17/2023	Telephone with SEC Counsel re: Receiver's claims against prime broker.	Z029	02518	DEB	0.50	\$299.25
02/17/2023	Emails to/from team re: Equiti document production.	Z029	02518	DEB	0.20	\$119.70
02/17/2023	Telephone with M. Conlan re: SEC status call.	Z029	02518	DEB	0.20	\$119.70
02/17/2023	Emails to/from J. Cunningham re: sale of M/V Currensea (0.1)s; review email archives re: same (0.2).	Z029	02518	DEB	0.30	\$179.55
02/17/2023	Emails re: Equiti document production.	Z029	02518	DEB	0.20	\$119.70
02/17/2023	E-mails to/from D. Whitford re: Equiti document production.	Z029	02548	DC	0.10	\$59.85
02/17/2023	E-mails to/from D. Barney re: suit against prime broker.	Z029	02548	DC	0.20	\$119.70
02/21/2023	Email from D. Porteous re: contingency proposal for prime broker claims.	Z029	02518	DEB	0.20	\$119.70
02/21/2023	Review receivership order re: claims against prime broker.	Z029	02518	DEB	0.50	\$299.25
02/21/2023	Emails regarding Broker Defendant's hardship documents.	Z029	30541	MAC	0.40	\$163.80
02/21/2023	Emails discussing Net Winner settlement.	Z029	30541	MAC	0.60	\$245.70
02/21/2023	Emails regarding Broker Defendant settlement.	Z029	30541	MAC	0.10	\$40.95
02/21/2023	Draft and effect filing of Motion for Default Judgment against Broker Defendant.	Z029	30541	MAC	2.80	\$1,146.60
02/21/2023	Review voicemail from prime broker's counsel, Stephen Senderowitz, re: Receiver's claims against prime broker.	Z029	02548	DC	0.10	\$59.85
02/21/2023	Review e-mails between M. Conforti and various parties re: resolution of Receiver's claims.	Z029	02548	DC	0.30	\$179.55
02/21/2023	Review default judgment motion against broker.	Z029	02548	DC	0.20	\$119.70
02/21/2023	E-mails to/from M. Conforti re: privacy issues raised by default motion.	Z029	02548	DC	0.10	\$59.85
02/21/2023	E-mails to/from E. Rosen re: privacy issues raised by default motion.	Z029	02548	DC	0.10	\$59.85
02/21/2023	Confer with E. Rosen re: fee application and default judgment motion against broker.	Z029	02548	DC	0.30	\$179.55
02/21/2023	Prepare Default Judgment Motion with Declarations in Support, exhibits, and Proposed Order in preparation for electronic filing, including additional redaction (0.7); file and serve same (0.1); review and receipt of as-filed versions re: same (0.1); coordinate email and mail service of same (0.2); email with team re: same (0.1).	Z029	26059	ER	1.20	\$329.40
02/21/2023	Prepare broker default exhibit for electronic filing (0.7); confer and email with team re: same (0.1).	Z029	26059	ER	0.80	\$219.60
02/22/2023	Confer with M. Conlan re: prime broker claims.	Z029	02518	DEB	0.40	\$239.40
02/22/2023	Emails to/from M. Conlan and D. Porteous re: prime broker Claims.	Z029	02518	DEB	0.20	\$119.70

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Gibbons P.C.

Time Detail
Run Date: 4/26/2023

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
02/22/2023	Teams call with D. Barney re: prime broker claims.	Z029	02062	MC2	0.40	\$239.40
02/22/2023	Confer with D. Barney re: Receiver's claims against prime broker.	Z029	02548	DC	0.10	\$59.85
02/22/2023	E-mails to/from D. Barney and prime broker's counsel re: conference on Receiver's claims.	Z029	02548	DC	0.20	\$119.70
02/22/2023	Email with team re: docket order requesting Status Report for Conlan v. K8EDW.	Z029	26059	ER	0.10	\$27.45
02/22/2023	Assistance to M. Conlan regarding the delivery of image folder for ingestion into Relativity.	Z029	89266	DW	4.10	\$848.70
02/23/2023	Telephone with D. Crapo and S. Serenowitz re: tolling of date for determination of assertion of claims against prime broker and background.	Z029	02518	DEB	0.30	\$179.55
02/23/2023	Review/analyze pleadings and documents filed in Investors' 28 USC 1782 action against prime broker et al.	Z029	02518	DEB	4.20	\$2,513.70
02/23/2023	Participate in conference call with D. Barney and prime broker counsel, Stephen Senderowitz. re: Receiver's potential claim against prime broker.	Z029	02548	DC	0.20	\$119.70
02/23/2023	Confer with D. Barney re: Receiver's potential claim against prime broker.	Z029	02548	DC	0.10	\$59.85
02/23/2023	E-mail to Mr. Senderowitz re: Receiver's potential claim against prime broker.	Z029	02548	DC	0.10	\$59.85
02/23/2023	Review lien search re: Nicholas and Katherine Edwards' real property.	Z029	02548	DC	0.10	\$59.85
02/23/2023	E-mails to/from M. Conforti re: Nicholas and Katherine Edwards' real property.	Z029	02548	DC	0.10	\$59.85
02/23/2023	Assistance to M. Conlan regarding the final delivery of image folder for ingestion into Relativity.	Z029	89266	DW	5.10	\$1,055.70
02/24/2023	Emails to/from S. Senderowitz re: receiver's potential claims against prime broker.	Z029	02518	DEB	0.20	\$119.70
02/24/2023	Review Mason deposition and Forex trading mechanics re: open positions and potential claims against prime broker and email to M. Conlan re: same.	Z029	02518	DEB	3.20	\$1,915.20
02/24/2023	Review e-mails between M. Conforti and Asim Ali re: resolution of Receiver's claim against Buy Properties Investment.	Z029	02548	DC	0.20	\$119.70
02/24/2023	Review e-mail from Stephen Senderowitz re: potential Receivership claims against prime broker.	Z029	02548	DC	0.10	\$59.85
02/24/2023	Confer with Robert Welch, counsel for the Archdiocese of Philadelphia, and St. Charles Borromeo Seminary, re: resolution of Receiver's claims.	Z029	02548	DC	0.20	\$119.70
02/24/2023	Review of correspondence produced by Equiti.	Z029	02548	DC	0.20	\$119.70
02/27/2023	Emails to/from M. Conlan and J. Cunningham re: M/V Currenseas	Z029	02518	DEB	0.20	\$119.70
02/27/2023	Review application for documentation of M/V Currenseas (0.2); telephone call with USCG re: same (0.1).	Z029	02518	DEB	0.30	\$179.55
02/27/2023	Confirm status of documentation application for M/V Currenseas (0.3); confer with M. Conlan re: same (0.2); emails and telephone with J. Cunningham re: same (0.3).	Z029	02518	DEB	0.80	\$478.80
02/27/2023	Confer with Robert Welch, counsel for the Archdiocese of Philadelphia and St. Charles Borromeo Seminary, re: resolution of Receiver's claims.	Z029	02548	DC	0.30	\$179.55
02/27/2023	Revisions to settlement offer per conference with Mr. Welch.	Z029	02548	DC	0.20	\$119.70
02/27/2023	E-mails to/from M. Conlan re: prime broker representation.	Z029	02548	DC	0.20	\$119.70
02/27/2023	E-mails to/from counsel, Steven Senderowitz, re: prime broker representation.	Z029	02548	DC	0.10	\$59.85
02/27/2023	Confer with prime broker's counsel, Steven Senderowitz, re: prime broker representation.	Z029	02548	DC	0.20	\$119.70
02/27/2023	Review and receipt of settlement letter to charity; email with team re: same.	Z029	26059	ER	0.10	\$27.45
02/28/2023	Draft settlement agreement to resolve Net Winner complaint.	Z029	30541	MAC	1.30	\$532.35
02/28/2023	E-mails with SEC team and D. Barney re: Prime Broker claims.	Z029	02062	MC2	0.10	\$59.85
02/28/2023	Review and sign settlement agreement with Phenom Ventures.	Z029	02062	MC2	0.10	\$59.85
03/01/2023	Attend to e-mails with M. Conforti and T. Williams re: Gray settlement.	Z029	02062	MC2	0.10	\$59.85
03/02/2023	Review M. Young's motion for relief from asset freeze order for funds to pay counsel fees.	Z029	02518	DEB	0.70	\$418.95
03/02/2023	Emails to/from J. Cunningham re: Offer on M/V Currenseas.	Z029	02518	DEB	0.20	\$119.70
03/02/2023	Edits and revisions to draft settlement agreement, including conforming state-law edits.	Z029	30541	MAC	0.90	\$368.55
03/02/2023	Review e-mails to/from various parties re: Michael and Maria Young's motion re: relief from asset freeze order.	Z029	02548	DC	0.10	\$59.85
03/02/2023	Review e-mail between M. Conforti and net winner avoidance action defendant.	Z029	02548	DC	0.10	\$59.85

Gibbons P.C.

Time Detail

Run Date: 4/26/2023

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
03/02/2023	Review and receipt of broker settlement [0.1]; update status chart re: same [0.1].	Z029	26059	ER	0.20	\$54.90
03/03/2023	Review e-mails between M. Conforti and Asim Ali of Buy Properties Investments re: resolution of Receiver's claim.	Z029	02548	DC	0.10	\$59.85
03/06/2023	Attention to Net Winner settlement signature, and next steps.	Z029	30541	MAC	0.20	\$81.90
03/07/2023	Review messages from J. Cunningham and S. Serewitz re: M/V Currenseas and prime broker claims (0.2); confer with M. Conlan re: same (0.1).	Z029	02518	DEB	0.30	\$179.55
03/08/2023	Emails regarding settlements generally.	Z029	30541	MAC	0.20	\$81.90
03/08/2023	Review e-mails between M. Conforti and various parties re: resolution of Receiver's claims against them.	Z029	02548	DC	0.10	\$59.85
03/09/2023	Telephone with and email to J. Cunningham re: M/V Currenseas.	Z029	02518	DEB	0.50	\$299.25
03/09/2023	Review status of certificate of documentation of M/V Currenseas.	Z029	02518	DEB	0.50	\$299.25
03/09/2023	Emails finalizing two settlement agreements.	Z029	30541	MAC	0.30	\$122.85
03/09/2023	Telephone call with M. Conforti re: settlements with Buy Investments and Mercury Alternative Fund (0.1); review and sign settlement stipulations (0.2).	Z029	02062	MC2	0.30	\$179.55
03/09/2023	Review e-mails between M. Conforti and various parties (including Receiver) re: resolution of Receiver's claims against them.	Z029	02548	DC	0.20	\$119.70
03/10/2023	Emails to/from M. Conlan and J. Cunningham re: M/V Currenseas sale.	Z029	02518	DEB	0.60	\$359.10
03/13/2023	Emails with Broker Defendant's counsel finalizing settlement agreement.	Z029	30541	MAC	0.20	\$81.90
03/13/2023	Confer with D. Crapo re: litigation update.	Z029	02062	MC2	0.20	\$119.70
03/13/2023	Review and sign settlement agreement with broker defendant.	Z029	02062	MC2	0.10	\$59.85
03/13/2023	Review e-mails from settling "net winner"; review e-mails between M. Conforti and settling "net winner."	Z029	02548	DC	0.30	\$179.55
03/13/2023	Confer with M. Conlan re: claims against prime broker, K8EDW, James Roche and Stewart family members.	Z029	02548	DC	0.20	\$119.70
03/13/2023	Review information relevant to claims against Stewart family members.	Z029	02548	DC	0.30	\$179.55
03/14/2023	Confer with M. Conlan re: Claims against prime broker and M/V Currenseas.	Z029	02518	DEB	0.40	\$239.40
03/14/2023	Review e-mails between M. Conforti and "net winners" or brokers re: resolution of Receiver's claims.	Z029	02548	DC	0.30	\$179.55
03/14/2023	Review and receipt of wire advice (0.1); update broker chart to reflect settlement payment (0.1)	Z029	26059	ER	0.20	\$54.90
03/15/2023	Edits and revisions to draft New Winner settlement agreement.	Z029	30541	MAC	0.40	\$163.80
03/15/2023	Review SEC's unopposed motion for more time to respond to motion on remand.	Z029	02062	MC2	0.10	\$59.85
03/15/2023	Attend to e-mails with N. Shea and M. Conforti re: avoidance payment.	Z029	02062	MC2	0.10	\$59.85
03/16/2023	Conferred with E. Rosen regarding Status Report on the second Broker Defendant complaint.	Z029	30541	MAC	0.20	\$81.90
03/17/2023	Review court filings.	Z029	02518	DEB	0.20	\$119.70
03/17/2023	Finalized status report for Broker Complaint.	Z029	30541	MAC	0.10	\$40.95
03/17/2023	Review and receipt of Net Winner wire; update spreadsheet re: same.	Z029	26059	ER	0.10	\$27.45
03/20/2023	Emails to/from M. Conlan and D. Porteous re: meeting on prime broker claims.	Z029	02518	DEB	0.50	\$299.25
03/20/2023	Draft amended Coast Guard application documents for documentation of M/V Currenseas.	Z029	02518	DEB	2.20	\$1,316.70
03/20/2023	Attend to e-mails with M. Conforti and J. Curtis re: Buy Investments settlement.	Z029	02062	MC2	0.10	\$59.85
03/20/2023	E-mails with E. Rosen re: updating case deadlines.	Z029	02062	MC2	0.10	\$59.85
03/20/2023	Telephone call with M. Conforti re: settlement with M. Gray.	Z029	02062	MC2	0.10	\$59.85
03/20/2023	Telephone call with M. Conforti re: update on litigation claims.	Z029	02062	MC2	0.10	\$59.85
03/21/2023	Prepare for/attend conference with SEC Counsel and M. Conlan re: receiver's claims against prime broker and sale of M/V Currenseas (1.5); confer with M. Conlan and R. Malone re: same (0.8).	Z029	02518	DEB	2.30	\$1,376.55
03/21/2023	Telephone with USCG re: documentation of M/V Currenseas.	Z029	02518	DEB	0.30	\$179.55
03/21/2023	Emails to/from J. Deckenbach re: documentation for M/V Currenseas.	Z029	02518	DEB	0.20	\$119.70
03/21/2023	Legal research on prime broker claims.	Z029	02062	MC2	1.30	\$778.05
03/21/2023	Conference call with D. Barney and R. Malone re: prime broker claims.	Z029	02062	MC2	0.10	\$59.85

Gibbons P.C.

Time Detail

Run Date: 4/26/2023

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
03/21/2023	Review remittance from Vision Financial; transmit same to R. Ereksom.	Z029	02062	MC2	0.10	\$59.85
03/21/2023	Confer with M. Conlan re: potential claims against prime broker.	Z029	02548	DC	0.10	\$59.85
03/21/2023	Confer with Robert Welsh, counsel for the Archdiocese of Philadelphia, and St. Charles Borromeo Seminary re: resolution of Receiver's claim.	Z029	02548	DC	0.20	\$119.70
03/21/2023	E-mails to/from Yaitza Maldonado, counsel for Parrocchia de San Antonio de Padua, re: resolution of Receiver's claim.	Z029	02548	DC	0.20	\$119.70
03/21/2023	Prepare documents for settlement of Receiver's claims against Parrocchia de San Antonio de Padua.	Z029	02548	DC	0.50	\$299.25
03/22/2023	Conference with M. Conlan re: prime broker Claims.	Z029	02518	DEB	0.60	\$359.10
03/22/2023	Revise application for title documentation for M/V Currenseas (0.5); review Mediatrix complaint and corporate documents re: same (0.5); telephone with USCG re: same (0.2).	Z029	02518	DEB	1.20	\$718.20
03/22/2023	Confer with M. Conlan prime broker claims.	Z029	02518	DEB	0.50	\$299.25
03/22/2023	Confer with D. Barney re: review of prime broker claims.	Z029	02062	MC2	0.60	\$359.10
03/22/2023	E-mails with D. Porteous and D. Barney re: meeting on prime broker claims; telephone call with D. Barney re: same.	Z029	02062	MC2	0.30	\$179.55
03/22/2023	E-mail from prime broker counsel, Steven Senderowitz, re: Receiver's claims.	Z029	02548	DC	0.10	\$59.85
03/22/2023	E-mail to M. Conlan re: Receiver's claims against prime broker.	Z029	02548	DC	0.10	\$59.85
03/22/2023	Confer with D. Barney re: Receiver's claims against prime broker.	Z029	02548	DC	0.10	\$59.85
03/22/2023	E-mails to/from Yaitza Maldonado, counsel for Parrocchia de San Antonio de Padua, re: resolution of Receiver's claim.	Z029	02548	DC	0.20	\$119.70
03/22/2023	Detailed email with M. Conlan re: corporate documentation.	Z029	26059	ER	0.20	\$54.90
03/23/2023	Emails to/from team re: maintenance of Equiti document production.	Z029	02518	DEB	0.20	\$119.70
03/23/2023	Confer with M. Conlan re: claims process and review FDIC QSF whitepaper.	Z029	02518	DEB	0.30	\$179.55
03/23/2023	Draft email to USCG re: revisions to application for certificate of documentation of M/V Currenseas.	Z029	02518	DEB	0.50	\$299.25
03/23/2023	Review emails re: investor lists, claims process and QSF accounts and FDIC letter.	Z029	02518	DEB	0.50	\$299.25
03/23/2023	E-mails with team re: maintaining document database.	Z029	02062	MC2	0.10	\$59.85
03/23/2023	E-mails with team re: prime broker claims analysis.	Z029	02062	MC2	0.20	\$119.70
03/23/2023	Telephone call with T. Ashmore re: appeal of charitable contribution decision.	Z029	02062	MC2	0.30	\$179.55
03/23/2023	Review Court Order Denying Young's Renewed Motion re: Charities.	Z029	02062	MC2	0.10	\$59.85
03/23/2023	Telephone call with T. Ashmore re: Court's ruling on renewed charities motion, and Equiti document production (0.3); confer with D. Crapo re: same (0.2).	Z029	02062	MC2	0.50	\$299.25
03/23/2023	Confer with M. Conlan re: Equiti protective order.	Z029	02548	DC	0.10	\$59.85
03/23/2023	E-mails to/from M. Conlan re: status of claims against charities.	Z029	02548	DC	0.10	\$59.85
03/23/2023	E-mails to/from M. Conlan re: status of complaints against violators of asset freeze order.	Z029	02548	DC	0.10	\$59.85
03/23/2023	Review e-mails between various parties re: Equiti documents.	Z029	02548	DC	0.20	\$119.70
03/23/2023	Confer with Robert Welsh, counsel for Archdiocese of Philadelphia and St. Charles Borromeo Seminary, re: resolution of Receiver's claim.	Z029	02548	DC	0.10	\$59.85
03/23/2023	Review Judge Moore's opinion and order denying Michael and Maria Young's renewed charities motion, as well as related filings.	Z029	02548	DC	0.20	\$119.70
03/23/2023	Email with team re: metrics for Relativity data.	Z029	26059	ER	0.20	\$54.90
03/24/2023	Review emails from J. Curtis and M. Conlan re: investor losses (0.3); confer with M. Conlan re: same (0.2).	Z029	02518	DEB	0.50	\$299.25
03/24/2023	Review e-mails with D. Crapo and J. Curtis re: avoidance claims against the Archdiocese of Philadelphia.	Z029	02062	MC2	0.10	\$59.85
03/24/2023	Review court status conference notice in K8EDW matter.	Z029	02548	DC	0.10	\$59.85
03/24/2023	Review appeal transmittal papers re: Young's appeal from Judge Moore's order denying their renewed charities motion.	Z029	02548	DC	0.20	\$119.70
03/24/2023	E-mail's to/from M. Conlan and E. Rosen re: 10th Circuit appellate procedures.	Z029	02548	DC	0.20	\$119.70
03/24/2023	Confer with Robert Welsh, counsel for Archdiocese of Philadelphia and St. Charles Borromeo Seminary, re: resolution of Receiver's claim.	Z029	02548	DC	0.20	\$119.70

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Gibbons P.C.

Time Detail
Run Date: 4/26/2023

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
03/24/2023	Review Equiti/SEC confidentiality order.	Z029	02548	DC	0.20	\$119.70
03/24/2023	E-mail to M. Conlan re: Equiti confidentiality order on documents produced by Equiti.	Z029	02548	DC	0.10	\$59.85
03/24/2023	Confer with M. Conlan re: Equiti protective order.	Z029	02548	DC	0.10	\$59.85
03/24/2023	E-mails to/from M. Conlan re: status of complaints against violators of asset freeze order.	Z029	02548	DC	0.10	\$59.85
03/24/2023	Review and receipt of Youngs' Notice of Appeal (0.1); detailed email to team re: same (0.1).	Z029	26059	ER	0.20	\$54.90
03/24/2023	Docket Conlan v. K8EDW Status Conference.	Z029	26059	ER	0.10	\$27.45
03/27/2023	Review Young appeal pleadings and emails.	Z029	02518	DEB	0.30	\$179.55
03/27/2023	Review investor loss analysis (0.2); review emails re: same (0.1).	Z029	02518	DEB	0.30	\$179.55
03/27/2023	Emails to/from J. Cunningham re: M/V Currenseas.	Z029	02518	DEB	0.20	\$119.70
03/27/2023	Confer with E. Rosen re: 10th Circuit procedure.	Z029	02548	DC	0.10	\$59.85
03/27/2023	Confer with M. Conlan re: Equiti documents.	Z029	02548	DC	0.10	\$59.85
03/27/2023	Review and receipt of 10th Cir transmittal; confer with team re: same.	Z029	26059	ER	0.10	\$27.45
03/28/2023	Review pleadings on Youngs' appeal of order denying motion for access to funds.	Z029	02518	DEB	0.30	\$179.55
03/28/2023	Review wire confirmation from EastWest Bank re: settlement proceeds from Phenom Ventures; e-mails with M. Conforti re: same.	Z029	02062	MC2	0.10	\$59.85
03/28/2023	Confer with E. Rosen re: 10th Circuit procedure.	Z029	02548	DC	0.10	\$59.85
03/28/2023	Review notices from and filings with the Tenth Circuit re: appeal by Maria and Michael Young re: charities order.	Z029	02548	DC	0.10	\$59.85
03/28/2023	Review and receipt of 10th Circuit letter re: deadlines for entries of appearance and Certification of Interested Parties (0.1); docket deadlines (0.1).	Z029	26059	ER	0.20	\$54.90
03/29/2023	Review court's order to show cause on Young appeal.	Z029	02518	DEB	0.20	\$119.70
03/29/2023	Conference with M. Conlan and Faegre team re: Claims against prime broker.	Z029	02518	DEB	0.30	\$179.55
03/29/2023	Reviewed and finalized voluntary withdrawal of motion for default judgment papers, and voluntary dismissal of a broker defendant papers, for filing.	Z029	30541	MAC	0.20	\$81.90
03/29/2023	E-mails with D. Crapo re: Young appeal of Order Denying Motion to Terminate Collections from Charities.	Z029	02062	MC2	0.10	\$59.85
03/29/2023	Review 10th Circuit's Order staying briefing; e-mails with D. Crapo, J. Hradil and E. Rosen re: same.	Z029	02062	MC2	0.20	\$119.70
03/29/2023	Review docket entry certifying record on appeal to Court of Appeals.	Z029	02062	MC2	0.10	\$59.85
03/29/2023	Telephone call with E. Rosen re: Young appeal (0.1); e-mails with J. Hradil, E. Rosen and D. Crapo re: same (0.3).	Z029	02062	MC2	0.40	\$239.40
03/29/2023	Conference call with Faegre Drinker team re: prime broker claims.	Z029	02062	MC2	0.20	\$119.70
03/29/2023	E-mails with M. Conforti re: dismissal of claims against Alternative Asset Management and K8EDW.	Z029	02062	MC2	0.10	\$59.85
03/29/2023	E-mails to/from M. Conlan and E. Rosen re: 10th Circuit procedure.	Z029	02548	DC	0.30	\$179.55
03/29/2023	Update broker chart with final settlement payment (0.1); draft Notice of Dismissal re: Phenom Ventures (0.2); review an receipt of wire advice (0.1); email with team re: same (0.1).	Z029	26059	ER	0.50	\$137.25
03/30/2023	Confer with counsel for Parrocchia de San Antonio de Padua re: resolution of Receiver's claims.	Z029	02548	DC	0.20	\$119.70
03/30/2023	E-mails to/from counsel for Parrocchia de San Antonio de Padua re: resolution of Receiver's claims.	Z029	02548	DC	0.20	\$119.70
03/30/2023	E-mails to/from M. Conforti re: settlement procedures.	Z029	02548	DC	0.10	\$59.85
03/30/2023	E-mails to/from counsel for Michael and Maria Young, Tracy Ashmore, re: 10th Circuit Appeal.	Z029	02548	DC	0.30	\$179.55
03/30/2023	Review 10th Circuit order on Michael and Maria Young's appeal from charities order.	Z029	02548	DC	0.20	\$119.70
03/30/2023	Confer with M. Conlan re: Michael and Maria Young's appeal from charities order.	Z029	02548	DC	0.10	\$59.85
03/31/2023	Telephone with M. Conlan and SEC Counsel re: prime broker claims, FAQ and claims process.	Z029	02518	DEB	0.50	\$299.25
03/31/2023	Telephone with M. Conlan re: Investor loss totals and claims process.	Z029	02518	DEB	0.30	\$179.55
03/31/2023	Review emails and spreadsheets re: investor losses.	Z029	02518	DEB	0.70	\$418.95

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Gibbons P.C.

Time Detail
Run Date: 4/26/2023

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
03/31/2023	Conferred with M Conlan and E Rosen regarding claims process and Broker Defendant Complaint.	Z029	30541	MAC	0.20	\$81.90
03/31/2023	Review and analyze SEC brief in opposition to Youngs' Motion for Relief from Asset Freeze Order to Pay Counsel Fees.	Z029	02062	MC2	0.60	\$359.10
03/31/2023	Attend to e-mails with D. Crapo and T. Ashmore re: request to dismiss Young appeal.	Z029	02062	MC2	0.10	\$59.85
03/31/2023	Review docket in prime broker 782 action.	Z029	02062	MC2	0.40	\$239.40
03/31/2023	Legal research on appellate jurisdiction for Youngs' appeal.	Z029	02062	MC2	0.10	\$59.85
03/31/2023	Update calendar re: discovery deadlines in case per ECF No. 395.	Z029	02062	MC2	0.10	\$59.85
03/31/2023	E-mails to/from E. Rosen and Melissa Marquinhos re: 10th Circuit procedures.	Z029	02548	DC	0.10	\$59.85
03/31/2023	Confer with E. Rosen re: 10th Circuit procedures.	Z029	02548	DC	0.10	\$59.85
03/31/2023	E-mails to/from M. Conforti re: 10th circuit appeal of denial of Michael and Maria Young's charity motion.	Z029	02548	DC	0.10	\$59.85
03/31/2023	E-mails to/from M. Conlan and counsel for Michael and Maria Young, Tracy Ashmore, re: dismissal of 10th Circuit appeal.	Z029	02548	DC	0.20	\$119.70
	Sub-Total For Task: Z029 Litigation				195.80	\$103,405.50
01/11/2023	Review tax provisions of Wilmington Trust escrow agreement and receivership order (0.2); emails re: same (0.1).	Z076	02518	DEB	0.30	\$179.55
01/11/2023	Review email and confer with M. Conlan regarding need to review draft Wilmington escrow agreement in light of status of Funds as Qualified Settlement Fund under IRC Section 468B.	Z076	00168	PJU	0.30	\$179.55
01/12/2023	E-mails and confer with P. Ulrich re: tax issues.	Z076	02062	MC2	0.30	\$179.55
01/12/2023	Review draft Wilmington escrow agreement in light of provision of Court Appointment Order providing for Qualified Settlement Fund treatment of receivership funds.	Z076	00168	PJU	0.70	\$418.95
01/13/2023	E-mails with P. Ulrich and N. Adams (Wilmington Trust) re: tax edits to Escrow Agreement.	Z076	02062	MC2	0.30	\$179.55
01/13/2023	Confer and email with team re: W-9 request (0.1); draft W-9 for Receivership (0.2); email with H. Denison of RMA re: same (0.1).	Z076	26059	ER	0.40	\$109.80
01/13/2023	Review 2021 previously filed federal and state returns and regulations under IRC Section 468B to analyze tax treatment of receivership funds under Appointment Order.	Z076	00168	PJU	0.60	\$359.10
01/13/2023	Draft insert to Wilmington escrow agreement to clarify tax treatment of receivership to be consistent with QSF regulations and Appointment Order. Forward to M. Conlan.	Z076	00168	PJU	0.60	\$359.10
02/21/2023	E-mails to/from Michael and Maria Young's counsel, Tracy Ashmore, re: tax issues.	Z076	02548	DC	0.10	\$59.85
02/22/2023	E-mails to/from Raani Ereksen of RMA re: payment of Youngs' property taxes.	Z076	02548	DC	0.20	\$119.70
02/22/2023	E-mails to/from Youngs' counsel, Tracy Ashmore, re: Youngs' property taxes.	Z076	02548	DC	0.10	\$59.85
03/28/2023	Confer with P. Ulrich re: tax issues, including call with J. Gifford at RMA re: extension on tax filing.	Z076	02062	MC2	0.30	\$179.55
03/28/2023	Confer with M. Conlan regarding tax return obligations and questions on filing dates. Confer regarding possible disclosures to beneficiaries.	Z076	00168	PJU	0.20	\$119.70
03/28/2023	Telephone call with M. Conlan and outside tax accountant on filing deadline and questions on filing issues and estimated taxes.	Z076	00168	PJU	0.10	\$59.85
	Sub-Total For Task: Z076 Tax Issues				4.50	\$2,563.65
01/19/2023	E-mails with J. Deckenbach re: replacement title for 38' Sea Vee motor yacht.	ZD03	02062	MC2	0.10	\$59.85
01/26/2023	Review e-mail from D. Barney to US Coast Guard re: transfer of title to MV Currenseas.	ZD03	02062	MC2	0.10	\$59.85
01/26/2023	Review e-mail from D. Barney re: obtaining replacement boat title for M.V Currenseas from USGC.	ZD03	02062	MC2	0.10	\$59.85
01/27/2023	Review e-mails between D. Barney, US Coast Guard and J. Deckenbach re: documentation for MV Currenseas.	ZD03	02062	MC2	0.10	\$59.85
02/01/2023	Telephone call with D. Barney re: disposition of MV Currenseas.	ZD03	02062	MC2	0.20	\$119.70
02/02/2023	Confer with D. Barney re: repairs on MV Currenseas.	ZD03	02062	MC2	0.10	\$59.85
02/02/2023	E-mails with V. Drohan re: 704 Ocean Place.	ZD03	02062	MC2	0.10	\$59.85
02/02/2023	Telephone call with V. Drohan re: status of 704 Ocean Place and other matters.	ZD03	02062	MC2	0.20	\$119.70

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Gibbons P.C.

Time Detail
Run Date: 4/26/2023

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

Tran Date	Description Of Services	Task Code	Tkpr	Initials	Hours	Value
02/10/2023	Attend to e-mails with D. Barney re: MV Currenseas repair.	ZD03	02062	MC2	0.10	\$59.85
02/14/2023	Review cover letter to USCG re: application for exchange Certificate of Documentation for MV Currenseas.	ZD03	02062	MC2	0.10	\$59.85
02/15/2023	Attend to e-mails with J. Cunningham and D. Barney re: MV Currenseas.	ZD03	02062	MC2	0.10	\$59.85
02/17/2023	Telephone call with D. Barney re: cruising permit for MV Currenseas and sale of same.	ZD03	02062	MC2	0.10	\$59.85
02/24/2023	Attend to e-mails with V. Drohan and AUSA Gillespie re: offer on Bahamian condo.	ZD03	02062	MC2	0.20	\$119.70
02/27/2023	E-mails with D. Barney re: repair to MV Currenseas.	ZD03	02062	MC2	0.10	\$59.85
02/27/2023	Telephone call with D. Barney re: sale of MV Currenseas.	ZD03	02062	MC2	0.10	\$59.85
03/09/2023	E-mails with D. Barney re: sale of MV Currenseas.	ZD03	02062	MC2	0.10	\$59.85
03/10/2023	E-mails with J. Cunningham and D. Barney re: boat lift and possible sale.	ZD03	02062	MC2	0.20	\$119.70
03/14/2023	Confer with D. Barney re: prime broker claims and disposition of MV Currenseas.	ZD03	02062	MC2	0.30	\$179.55
03/17/2023	Emails to/from J. Cunningham re: M/V Currenseas sale.	ZD03	02518	DEB	0.20	\$119.70
03/20/2023	Review deficiency notice from Coast Guard re: Vessel Documentation; transmit same to D. Barney for response.	ZD03	02062	MC2	0.10	\$59.85
03/21/2023	Emails to/from J. Cunningham re: sale of M/V Currenseas and repair costs.	ZD03	02518	DEB	0.20	\$119.70
03/21/2023	Draft revised application for documentation and title to M/V Currenseas.	ZD03	02518	DEB	1.40	\$837.90
03/21/2023	E-mails with D. Barney, J. Deckenbach and J. Cunningham re: M/V Currenseas.	ZD03	02062	MC2	0.10	\$59.85
03/21/2023	Teams call with D. Barney and SEC counsel re: prime broker claims and disposition of MV Currenseas.	ZD03	02062	MC2	1.00	\$598.50
03/22/2023	Attend to e-mails with D. Barney and E. Rosen re: Mediatix corporate formation documents; review same in connection with Coast Guard application for replacement title documents.	ZD03	02062	MC2	0.20	\$119.70
03/23/2023	Telephone with J. Cunningham re: sale of M/V Currenseas.	ZD03	02518	DEB	0.30	\$179.55
03/23/2023	Research need for Certificate of Documentation to transfer title to M/V Currenseas in Bahamas.	ZD03	02518	DEB	0.40	\$239.40
03/23/2023	Confer with D. Barney re: title issues with M/V Currenseas.	ZD03	02062	MC2	0.20	\$119.70
Sub-Total For Task: ZD03 Asset Disposition					6.50	\$3,890.25
Total For Matter: 106202 Counsel to Mark Conlan in his capacity a					291.40	\$150,489.50
Totals For Client:					291.40	\$150,489.50

Gibbons P.C.

Time Summary
Run Date: 4/26/2023

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

Atty Code	Initials	Attorney Name	Position	Hours	Avg Rate	Value
02518	DEB	Barney, Dale E.	Director	70.60	\$598.50	\$42,254.10
02062	MC2	Conlan, Mark	Director	60.10	\$598.50	\$35,969.85
00168	PJU	Ulrich, Peter J.	Director	2.50	\$598.50	\$1,496.25
02548	DC	Crapo, David	Counsel	74.60	\$598.50	\$44,648.10
30541	MAC	Conforti, Michael A.	Associate	29.00	\$409.50	\$11,875.50
30611	KPM	McEvelly, Kyle P.	Associate	1.40	\$328.50	\$459.90
26059	ER	Rosen, Ellen	Case Manager	40.40	\$274.50	\$11,089.80
89266	DW	Whitford, Diane	Case Manager	12.00	\$207.00	\$2,484.00
40027	RT1	Traylor, Robin	Others	0.80	\$265.00	\$212.00
Totals:				291.40		\$150,489.50

Gibbons P.C.

Fee Application
Run Date: 4/26/2023

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

Phase/ Code	Description Of Services	Hours	Value
Z119	<u>Factual investigation</u>		
	02518 Barney, Dale E.	70.60	\$42,254.10
	30541 Conforti, Michael A.	29.00	\$11,875.50
	02062 Conlan, Mark	60.10	\$35,969.85
	02548 Crapo, David	74.60	\$44,648.10
	30611 McEvilly, Kyle P.	1.40	\$459.90
	26059 Rosen, Ellen	40.40	\$11,089.80
	40027 Traylor, Robin	0.80	\$212.00
	00168 Ulrich, Peter J.	2.50	\$1,496.25
	89266 Whitford, Diane	12.00	\$2,484.00
Z119	Factual investigation	291.40	\$150,489.50
Totals:		291.40	\$150,489.50

Gibbons P.C.

Fee Application
Run Date: 4/26/2023

Client/Matter: 117199 106202	Mark Conlan Counsel to Mark Conlan in his capacity as SEC Receiver
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Task/ Code	Description Of Services	Hours	Value
RE05	Status Reports	12.10	\$4,034.25
RE06	Litigation Consulting	3.00	\$666.90
Z017	Asset Analysis and Recovery	2.20	\$1,316.70
Z019	Business Operations	48.40	\$26,346.20
Z020	Case Administration	0.10	\$27.45
Z021	Claims Administration and Objections	5.90	\$3,369.15
Z023	Employment Applications	0.50	\$169.65
Z025	Fee Applications	12.40	\$4,699.80
Z029	Litigation	195.80	\$103,405.50
Z076	Tax Issues	4.50	\$2,563.65
ZD03	Asset Disposition	6.50	\$3,890.25
Totals:		291.40	\$150,489.50

Gibbons P.C.

Fee Application
Run Date: 4/26/2023

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

Task Code	Description Of Services	Hours	Value
RE05	Status Reports		
	02062 Conlan, Mark	1.50	\$897.75
	02548 Crapo, David	0.70	\$418.95
	26059 Rosen, Ellen	9.90	\$2,717.55
RE05	Status Reports	12.10	\$4,034.25
RE06	Litigation Consulting		
	02062 Conlan, Mark	0.10	\$59.85
	26059 Rosen, Ellen	0.10	\$27.45
	89266 Whitford, Diane	2.80	\$579.60
RE06	Litigation Consulting	3.00	\$666.90
Z017	Asset Analysis and Recovery		
	02062 Conlan, Mark	0.70	\$418.95
	02548 Crapo, David	1.50	\$897.75
Z017	Asset Analysis and Recovery	2.20	\$1,316.70
Z019	Business Operations		
	02518 Barney, Dale E.	14.40	\$8,618.40
	02062 Conlan, Mark	25.30	\$15,142.05
	02548 Crapo, David	0.40	\$239.40
	30611 McEvilly, Kyle P.	1.40	\$459.90
	26059 Rosen, Ellen	6.10	\$1,674.45
	40027 Traylor, Robin	0.80	\$212.00
Z019	Business Operations	48.40	\$26,346.20
Z020	Case Administration		
	26059 Rosen, Ellen	0.10	\$27.45
Z020	Case Administration	0.10	\$27.45
Z021	Claims Administration and Objections		
	02062 Conlan, Mark	5.00	\$2,992.50
	02548 Crapo, David	0.40	\$239.40
	26059 Rosen, Ellen	0.50	\$137.25
Z021	Claims Administration and Objections	5.90	\$3,369.15
Z023	Employment Applications		
	02062 Conlan, Mark	0.10	\$59.85
	26059 Rosen, Ellen	0.40	\$109.80
Z023	Employment Applications	0.50	\$169.65
Z025	Fee Applications		
	02518 Barney, Dale E.	0.20	\$119.70
	02062 Conlan, Mark	2.60	\$1,556.10
	02548 Crapo, David	1.20	\$718.20
	26059 Rosen, Ellen	8.40	\$2,305.80
Z025	Fee Applications	12.40	\$4,699.80
Z029	Litigation		
	02518 Barney, Dale E.	53.20	\$31,840.20
	30541 Conforti, Michael A.	29.00	\$11,875.50
	02062 Conlan, Mark	19.90	\$11,910.15
	02548 Crapo, David	70.00	\$41,895.00
	26059 Rosen, Ellen	14.50	\$3,980.25
	89266 Whitford, Diane	9.20	\$1,904.40
Z029	Litigation	195.80	\$103,405.50
Z076	Tax Issues		

Gibbons P.C.

Time Detail

Run Date: 4/26/2023

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

	02518	Barney, Dale E.	0.30	\$179.55
	02062	Conlan, Mark	0.90	\$538.65
	02548	Crapo, David	0.40	\$239.40
	26059	Rosen, Ellen	0.40	\$109.80
	00168	Ulrich, Peter J.	2.50	\$1,496.25
Z076	Tax Issues		4.50	\$2,563.65
ZD03	Asset Disposition			
	02518	Barney, Dale E.	2.50	\$1,496.25
	02062	Conlan, Mark	4.00	\$2,394.00
ZD03	Asset Disposition		6.50	\$3,890.25
Totals:			291.40	\$150,489.50

Gibbons P.C.

Disbursement Detail
Run Date: 4/25/2023

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

Tran Date	Description Of Disbursement	Value
<u>Disbursement Type:</u> <u>Filing and Miscellaneous Fees</u>		
02/13/2023	Filing and Miscellaneous Fees	\$225.00
02/01/2023	Filing and Miscellaneous Fees	\$20.00
	Total: Filing and Miscellaneous Fees	\$245.00
<u>Disbursement Type:</u> <u>Service Fees</u>		
01/30/2023	Service Fees	\$21.00
02/01/2023	Service Fees	\$234.62
	Total: Service Fees	\$255.62
<u>Disbursement Type:</u> <u>Subpoena Fees</u>		
11/28/2022	Subpoena Fees	\$169.00
11/02/2022	Subpoena Fees	\$169.00
	Total: Subpoena Fees	\$338.00
Total Disbursements:		\$838.62

**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 JANUARY 1, 2023 THROUGH MARCH 31, 2023**

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 January 1, 2023 through March 31, 2023* [ECF No. 425] (the "Sixth Quarterly Fee Application"). The Court having reviewed and considered the Sixth Quarterly Fee Application, and all pleadings and evidence filed in support thereof, and there being no opposition to the Sixth Quarterly Fee Application, and good cause appearing therefore, IT IS

ORDERED that:

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

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

- a. The Receiver's fees in the amount of \$10,185.00; and
- b. The Receiver's counsel, Gibbons P.C.'s fees of \$150,489.50 and Gibbons' costs of \$838.62 for a total of \$151,328.12; and
- c. The Receiver's accountants, Rocky Mountain Advisory, LLC's, fees of \$9,449.50 and RMA's costs of \$59.67 for a total of \$9,509.17; and
- d. The Receiver's litigation local counsel in Washington State, Corr Cronin LLP's, fees of \$2,203.20 and Corr Cronin's costs of \$371.53 for a total of \$2,574.73.

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 Sixth Quarterly Fee Application.