

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

SECURITIES AND EXCHANGE COMMISSION, :

Plaintiff, :

-v- :

PLATINUM MANAGEMENT (NY) LLC; :

PLATINUM CREDIT MANAGEMENT, L.P.; :

MARK NORDLICHT; :

DAVID LEVY; :

DANIEL SMALL; :

URI LANDESMAN; :

JOSEPH MANN; :

JOSEPH SANFILIPPO; and :

JEFFREY SHULSE, :

Defendants. :

----- X

No. 16-CV-6848 (BMC)

**EIGHTH JOINT INTERIM APPLICATION OF THE RECEIVER  
AND OTTERBOURG P.C. FOR ALLOWANCE OF COMPENSATION  
AND REIMBURSEMENT OF EXPENSES INCURRED DURING THE PERIOD  
APRIL 1, 2019 THROUGH AND INCLUDING JUNE 30, 2019**

Melanie L. Cyganowski, the receiver (the “Receiver”) for Platinum Credit Management, L.P., Platinum Partners Credit Opportunities Master Fund LP, Platinum Partners Credit Opportunities Fund (TE) LLC, Platinum Partners Credit Opportunities Fund LLC, Platinum Partners Credit Opportunities Fund (BL) LLC, Platinum Liquid Opportunity Management (NY) LLC, Platinum Partners Liquid Opportunity Fund (USA) L.P., Platinum Partners Liquid Opportunity Master Fund L.P., Platinum Partners Credit Opportunities Fund International Ltd and Platinum Partners Credit Opportunities Fund International (A) Ltd. (collectively, the “Receivership Entities,” the “Platinum Entities” or “Platinum”), and Otterbourg P.C., as counsel to the Receiver (“Otterbourg” and, together with the Receiver, “Applicants”), hereby submit this Eighth Joint Interim Application (the “Eighth Interim Application”) for Allowance of

Compensation and Reimbursement of Expenses Incurred During the Period from April 1, 2019 through and including June 30, 2019 (the “Eighth Application Period”). There are two components to this Application: (i) the Receiver’s services; and (ii) the services of her counsel (Otterbourg). The Receiver requests interim approval of fees in the amount of \$67,660.00 and reimbursement of expenses in the amount of \$873.00 for the Eighth Application Period. Otterbourg requests interim approval of fees in the amount of \$966,801.82 and reimbursement of expenses in the amount of \$16,269.87 for the Eighth Application Period, for a combined total of fees for Applicants in the amount of \$1,034,461.82,<sup>1</sup> and expenses in the amount of \$17,142.87 for the Eighth Application Period.

This Eighth Interim Application contains the following sections:

**Section I** provides a preliminary statement of the Receiver’s activities during the Eighth Application Period.

**Section II** summarizes the background of the receivership and also contains case status information required by Section C.2 of the Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission (the “SEC Billing Guidelines”). Section II also describes the procedures used by Otterbourg in compiling its billing records and provides other information as requested by the SEC Billing Guidelines, including a description

---

<sup>1</sup> As agreed to by the Receiver, this total amount reflects several accommodations voluntarily made by Applicants: (1) a public service accommodation of a twenty percent (20%) reduction in the Receiver’s recorded time charges; (2) a ten percent (10%) reduction in Otterbourg’s recorded time charges for all project code categories except for those related to the Beechwood Action and the Arbitration (defined below), for which Applicants have agreed to a twenty-five percent (25%) reduction in Otterbourg’s time charges, subject to Applicants requesting partial repayment of such reduction later in the case; and (3) a reduction in the Receiver’s aggregate fees (prior to application of the public service accommodation) to discount for the customary annual increases in her billable rate since her appointment. Therefore, during the Eighth Application Period, the Receiver’s recorded time charges before application of these accommodations were \$106,250.00 and Otterbourg’s recorded time charges were \$1,218,824.50, for a combined gross legal fees total (before the application of any accommodations) of \$1,325,074.50.

of each exhibit to this Eighth Interim Application and the reduction in fees agreed to in connection with the appointment of the Receiver.

**Section III** contains a narrative description of the work Otterbourg professionals performed on behalf of the Receiver during the Eighth Application Period, under each project category, in accordance with Section D of the SEC Billing Guidelines. All such categories correspond with the SEC's SFAR in this case.

**Section IV** contains a summary of all expenses for which Otterbourg seeks reimbursement and the procedures and policies adopted by Otterbourg to ensure compliance with Section E of the SEC Billing Guidelines.

**Section V** briefly summarizes the standards to be applied by the Court in determining fee awards in SEC receivership cases.

## **I. PRELIMINARY STATEMENT**

During the Eighth Application Period, the significant areas of focus for the Receiver and her team<sup>2</sup> continued to be (i) the litigation commenced by the Receiver at the end of 2018 in the United States District Court for the Southern District of New York against a group of defendants seeking the avoidance of certain liens which may otherwise adversely impact potential distributions to investors and creditors as well as damages for claims arising from a fraudulent scheme perpetrated to the detriment of Platinum (the "Beechwood Action"); and (ii) the confidential arbitration proceeding commenced against the auditor of PPCO's 2014 financial statements (the "Arbitration"). The Receiver also continued to review the remaining non-litigation assets in the portfolio and seek to monetize those assets that still have prospects for monetization, both in and out of ongoing court proceedings, and for certain assets for which

---

<sup>2</sup> To assist her with her duties, the Receiver retained, with the approval of the Court (on July 21, 2017), Otterbourg P.C. ("Otterbourg") as her legal counsel [Dkt. no. 231] and Goldin Associates LLC as her financial advisor [Dkt. no. 232] ("Goldin" and, together with Otterbourg, the "Receivership Team").

monetization is not currently a possibility, to seek to limit any liability while the asset is held for potential future monetization or abandonment.

During the Eighth Application Period, the Receiver closed the sale of American Patriot Gold for net cash of \$251,679 to the Platinum estate (the “Receivership Estate”). The Receiver continues to monitor and seek disposition options for the remaining, illiquid and/or more problematic assets, but the focus of the Receivership has shifted to the pursuit of claims in the Arbitration and the Beechwood Action. The Beechwood Action also seeks to avoid blanket liens on Platinum’s assets asserted by certain of the defendants in the Beechwood Action. Accordingly, the results of the Beechwood Action have significance greater than just obtaining recoveries on behalf of the Receivership Estate.

**A. Analysis and Disposition of Receivership Assets**

The Receivership Team completed the sale of one portfolio asset (American Patriot Gold). The Receivership Team continued during the Eighth Application Period to work with restructuring professionals in Texas to bring the Arabella bankruptcy proceeding to a conclusion and focused on the disposition of the assets of LC Energy Operations LLP and the limitation of any potential liabilities with respect to the assets. The Receiver continued to explore options for some of the smaller assets, including small stock holdings. If there are any assets that have no current value, but have the potential to have value in the future and have no cost to the estate to maintain, the Receiver will continue to hold such assets while the litigations are ongoing.

To assist the Receiver with the monetization of the assets, she retained Houlihan Lokey Capital, Inc. (“Houlihan Lokey”)<sup>3</sup> and Conway MacKenzie Capital Advisors, LLC (“Conway MacKenzie”).<sup>4</sup> The services of both Houlihan Lokey and Conway MacKenzie have concluded.

During the Eighth Application Period, the Platinum Receivership received approximately \$250,000 from the sale of American Patriot Gold. This amount is in addition to the approximately \$64 million received by the Platinum Receivership from the liquidation of other assets from the date of appointment of the Receiver. Certain parties have asserted a claim to all or part of the proceeds of some of such liquidated investments. None of these assets has been marketed or sold in a “fire sale” fashion.

The Receiver cannot ascribe values to the assets that have not yet been monetized. Unfortunately, many of the values ascribed to Platinum assets, whether by the Prior Receiver or Platinum management, were based upon assumptions that derived from the plans and projections of prior (now removed) management. The actual realized value of these investments may differ materially from the valuations determined by Platinum’s prior management and/or the Prior Receiver, and the underlying assets may suffer from significant liabilities that were not accounted for in prior valuations. Many of the investments made by Platinum were investments in enterprises that are still in the developmental stage, have no established market value (with any future value being highly speculative) and, in some instances, require significant additional capital investment to even have the possibility of realizing a return on such investment. As such, the prior valuations were often based on assumptions that Platinum would invest significant

---

<sup>3</sup> The Court approved Houlihan Lokey’s retention on November 11, 2017, *nunc pro tunc* to September 11, 2017, and issued a Memorandum Opinion regarding Houlihan Lokey’s retention on November 21, 2017 [Dkt. No. 285] (the “Houlihan Opinion”).

<sup>4</sup> Conway MacKenzie’s retention was approved by the Court on November 11, 2017, *nunc pro tunc* to October 12, 2017. [Dkt. No. 280].

additional capital in the assets with the hope that such investments would pay dividends in the long-term future. As the Court previously stated, the Receiver is not tasked with making speculative investments or indulging in risky investment opportunities. *Houlihan Opinion* at 8. Even with such assumptions made by prior management regarding additional investment, the prior valuations generally were not supportable.

There are certain assets that may ultimately have no realizable value. All assets have been reviewed and disposition options for the remaining assets that are not in the process of being monetized are limited. Based upon the thorough due diligence performed by the Receivership Team, the Receiver's goal is to limit any further investment of professional resources in assets for which there is a limited or non-existent market. If the Receiver believes that there is the possibility that a market will develop (*e.g.*, a stock that is not currently trading, but for which the underlying company may develop into a profitable business), the Receiver may hold the asset for a period of time until a final decision must be made. Certain assets may ultimately be abandoned or become part of a bulk lot remnant sale. The Receivership Team also continues to work with other parties to realize upon assets that are subject to bankruptcy or liquidation proceedings.

Certain parties have asserted an interest, including an alleged secured interest, in some or all of the proceeds of the sale of Receivership Estate assets. In the Beechwood Action, the Receiver is seeking to void the purported blanket liens asserted on the Platinum assets.

A description of the investments in which Applicants dedicated significant time during the Eighth Application Period and the work done during the Eighth Application Period with respect to those investments is set forth in Section IV of this Eighth Interim Application.

## **B. Administrative Matters**

During the Eighth Application Period, the Receiver and the Receivership Team continued to speak and meet with various interested parties and groups, including the joint liquidators for Platinum Partners Value Arbitrage Fund L.P. (together with its feeder funds, “PPVA” or “PPVA Funds”),<sup>5</sup> the SEC and Platinum investors. The Receiver regularly updates the Receiver’s website with key documents, answers to frequently asked questions, and status reports to investors.

The Receivership Team also filed and responded to other applications made before this Court and in other court proceedings involving Platinum. Some of the Platinum investments are subject to their own bankruptcy proceedings or are involved in other court proceedings around the country and the world. During the Eighth Application Period, the Receivership Team continued to monitor such proceedings, either directly or through local counsel, and, when necessary, prepared pleadings and/or made appearances in such proceedings. The Receivership Team also responded to third party subpoenas during the Eighth Application Period.

## **II. CASE BACKGROUND AND STATUS**

### **A. Case Background**

#### SEC Complaint

On December 19, 2016, the United States Securities and Exchange Commission (the “SEC”) filed its Complaint (the “SEC Complaint”) against individual defendants Mark Nordlicht (“Nordlicht”), David Levy (“Levy”), Daniel Small, Uri Landesman,<sup>6</sup> Joseph Mann, Joseph San

---

<sup>5</sup> PPVA is the subject of insolvency proceedings pending in the Cayman Islands and a Chapter 15 bankruptcy proceeding in the U.S. Bankruptcy Court for the Southern District of New York.

<sup>6</sup> Uri Landesman passed away in September 2018.

Filippo (“San Filippo”), Jeffrey Shulse, and both Platinum Management (NY) LLC and Platinum Credit Management, L.P. (collectively with Nordlicht, the “Defendants”).

The SEC Complaint alleged, *inter alia*, that the Defendants conducted a fraudulent scheme to inflate asset values and illicitly moved investor money to cover losses and liquidity problems. This was an allegedly multi-pronged fraud perpetrated by Platinum Management (NY) LLC and Platinum Credit Management, L.P., the managers of PPVA and Platinum Credit Opportunities Master Fund L.P. (together with its feeder funds, “PPCO”), respectively, involving multiple individuals led by Nordlicht, the founder of the Platinum Entities and the Co-Chief Investment Officer of PPVA and PPCO.

The SEC further alleged that Nordlicht and the managers of the Platinum Entities overstated the value of an oil company (Black Elk) that was among the funds’ largest assets, and that they concealed a growing liquidity crisis by transferring money between the funds, making redemptions to favored investors and using misrepresentations to attract new investors to the struggling funds.

In a parallel action, the U.S. Attorney’s Office for the Eastern District of New York brought criminal charges against Nordlicht and the individual Defendants. The criminal trial against Nordlicht, Levy and San Filippo proceeded during the Eighth Application Period. Following the trial, the jury returned a verdict convicting Nordlicht and Levy of defrauding bondholders in portfolio company Black Elk Offshore Operations LLC, but acquitting the pair on the remaining charges. SanFilippo was acquitted on all counts with which he was charged. The Court thereafter overturned the jury verdict with respect to Mr. Levy and ordered a new trial with respect to Mr. Nordlicht. The Department of Justice is in the process of appealing those decisions, and in the interim, two additional criminal trials have been delayed. The Receiver and



the Receivership Team were not involved in either the prosecution of the criminal case by the Department of Justice (which almost entirely focused on PPVA rather than PPCO) or the advancement of the civil litigation by the SEC. However, the Receiver and her team did monitor the trial and verdict to analyze any impact of the outcome and the trial evidence on the Receivership.

Appointment of Receiver and Receivership Order

To prevent further diversion of funds and dissipation of the assets of the Platinum Entities, the SEC sought, *inter alia*, the appointment of a receiver to take control of the Platinum Entities and their assets.

On December 19, 2016, the District Court entered an Order Appointing Receiver, [Dkt. Nos. 6 and 16], which appointed Bart Schwartz as receiver (the “Prior Receiver”). At the time of his appointment, the Prior Receiver was serving as a monitor for the Platinum Entities.

On June 23, 2017, after six months, the Prior Receiver resigned and, upon the recommendation of the SEC, by Order dated July 6, 2017, Melanie L. Cyganowski was appointed as Receiver, effective immediately (*i.e.*, July 6, 2017), and ordered to assume all authority previously held by the Prior Receiver under the current Receivership Order. [Dkt. No. 216]. On October 16, 2017, the Court entered the Second Amended Order Appointing Receiver (the “Receivership Order”). [Dkt. No. 276]. The Court amended the Receivership Order on December 29, 2017 to add the following Cayman Islands entities to the receivership: Platinum Partners Liquid Opportunity Master Fund L.P., Platinum Partners Credit Opportunities Fund International, Ltd. and Platinum Partners Credit Opportunities Fund International (A), Ltd. [Dkt. No. 297].

Under the terms of the Receivership Order, the Receiver is, among other things, required to preserve the *status quo*, ascertain the extent of commingling of funds, ascertain the true

financial condition of the Platinum Entities, prevent further dissipation of property and assets of those entities, prevent the encumbrance or disposal of property or assets of the Platinum Entities, preserve the books, records, and documents of the Platinum Entities, be available to respond to investors' inquiries, protect investors' assets, conduct an orderly wind down, including a responsible disposition of assets and an orderly and fair distribution of those assets to investors, and determine whether one or more of the Receivership Entities should undertake bankruptcy filings.

**B. Case Status<sup>7</sup>**

In accordance with Section C.2. of the SEC Billing Guidelines, the Receiver and Otterbourg state as follows:

(a) As of June 30, 2019, the Receivership Entities had approximately \$37 million in funds. These funds include proceeds from the monetization of Platinum assets. Certain parties claiming an interest in particular sold assets have asserted claims to a portion of the sale proceeds of such assets (as opposed to a general claim against the Receivership Estate). Other parties have presented documentation purporting to grant them security interests in all or certain of Platinum's assets. These claims are being challenged in the Beechwood Action.

It is estimated that, as of June 30, 2019, accrued and unpaid administrative expenses were approximately \$7.3 million. Subsequent to the Eighth Application Period, the Court entered orders authorizing the payment of professional fees requested by the Receiver and the Receivership Team for the fourth quarter of 2018 and first quarter of 2019. Accordingly, current accrued and unpaid administrative expenses are approximately \$5.5 million, inclusive of this request and unbilled fees and expenses through September 30th. This amount also includes

---

<sup>7</sup> The Receiver and Otterbourg base the information in this section primarily on the receivership's Standardized Fund Accounting Reports covering the period October 1, 2018 through December 31, 2018.

holdbacks for prior applications of the Receiver, Otterbourg and Goldin, holdbacks to the Prior Receiver's counsel (Cooley) with respect to its interim fee application, and fees and expenses of other professionals retained by the Receiver or the Prior Receiver. In addition to these unpaid administrative expenses, the Receivership Estate paid remaining in-house Platinum staff and other operating expenses during the Eighth Application Period.

(b) Cash disbursements during the Eighth Application Period totaled approximately \$674,000. This amount consisted primarily of (i) \$93,079 in disbursements to professionals; (ii) \$420,976 in business asset expenses (payroll and related expenses paid to Platinum employees, as well as office rent); and (iii) \$160,025 in investment expenses, which relates to expenses associated with the preservation of the LC Energy asset.

Cash receipts during the Eighth Application Period totaled approximately \$491,000. This amount primarily consists of net proceeds derived from the disposition of the American Patriot Gold asset (\$251,679) and a refund (\$239,340) of the unused portion of a retainer that was deposited pre-Receivership with JDS Energy, a consultant retained in connection with the Abdala Gold Tailings asset.

The Receiver cannot at this time state when she expects the case to be concluded. The focus is shifting from the liquidation of assets to the prosecution and/or resolution of claims, litigation and/or resolution of purported blanket secured liens.

(c) Pursuant to the previously approved bar date procedures motion, the bar date to file a proof of claim asserting a claim arising before the Receivership was March 29, 2019 and the bar date for governmental units to file a proof of claim was April 12, 2019. Parties holding investor claims, claims for unpaid redemptions and administrative claims were not required to file proofs of claim. In addition, the Receiver has claims that may have been filed with the Prior

Receiver. In total, 327 claims were filed prior to the bar date. Some of these claims may be duplicate claims and some may be asserted against non-Receivership Entities. The Receivership Team has preliminarily reviewed the filed claims, but has not yet done an in-depth analysis of each claim, including which claims may be the subject to an objection and disallowance.

As of June 30, 2019, the primary assets of the Receivership Estate (“Receivership Property”) consisted of the following:

- (i) Cash and cash equivalents of approximately \$37 million;
- (ii) Real estate investments without any set book value, due to their inherently speculative nature;
- (iii) Remaining investments in natural resources, litigation financing, energy and other miscellaneous investments; and
- (iv) Potential litigation claims.

As stated above, the Receiver cannot at this time ascribe values to each of the assets in the Platinum portfolio.

(d) Other than the one pending action relating to a specific asset -- Lincoln National Insurance – and PPCO’s interest in the lawsuit relating to Agera Energy, the Receiver’s investigation of pre-petition activities has so far resulted in the commencement of two litigations: (i) the Arbitration commenced on April 27, 2018 and (ii) the Beechwood Action commenced on December 19, 2018.<sup>8</sup> Both of these actions are in the discovery and dispositive pleading stage and the Receiver cannot predict the outcome of these litigations or the timing of collecting on any judgment or settlement that may ultimately be obtained.

The Receivership Team continues to analyze other pre-Receivership activities, including transfers made by PPCO and PPLO to other entities and individuals, and the professional

---

<sup>8</sup> Subsequent to the Eighth Application Period, on August 1, 2019, the Receiver commenced a lawsuit against Greehey & Company, Ltd. Dynamic Resources LLC to recover on a loan obligation.

services provided by, among others, valuation agents, fund administrators, auditors and legal advisors, to determine if any additional causes of action exist that warrant the commencement of litigation. For any claims in which a statute of limitations may be approaching, the Receiver has reached out, and will continue to reach out, to the potential targets to enter into tolling agreements to allow the Receivership Team the appropriate time to investigate potential claims and, if necessary, commence action(s) against those targets that have declined to toll the statute of limitations. The Receiver cannot at this time state whether any additional actions will be commenced and, if so, when they would be commenced.

### **III. FEES AND EXPENSES REQUESTED**

In connection with the Eighth Application Period, the Receiver requests interim approval of her fees in the amount of \$67,660.00 and reimbursement of expenses in the amount of \$873.00. Otterbourg requests interim approval of its fees in the amount of \$966,801.82 and reimbursement of expenses in the amount of \$16,269.87. Thus, the combined total of fees for Applicants of \$1,034,461.82, plus expenses of \$17,142.87, is \$1,051,604.69.

The Receiver has assembled a team of Otterbourg professionals to address different investments and different issues that may arise within each investment. For example, a single investment, such as Arabella, which is in multiple bankruptcy proceedings in Texas, may require the assistance of professionals knowledgeable about bankruptcy issues, as well as pure litigation issues. The Otterbourg professionals communicate with each other and the other retained professionals regularly, so as to keep others informed of each's activities and avoid duplication of efforts.

The fees requested are determined on the basis of the hours worked by Otterbourg attorneys and paraprofessionals, as well as the Receiver, and the hourly rates in effect at the time the services were rendered, as modified by a public service accommodation, described below.

The fees requested also take into account all relevant circumstances and factors as set forth in the New York Lawyer's Rules of Professional Responsibility, as applied to Otterbourg as attorneys, including the nature of the services performed, the amount of time spent, the experience and ability of the lawyers and legal assistants working on this engagement, the novelty and complexity of the specific issues involved, the time limitations imposed by the circumstances, and the responsibilities undertaken by the Receiver and Otterbourg.

Pursuant to the public service accommodation applicable to this matter, a 20% accommodation has been applied across the board to the Receiver's recorded time. Furthermore, fees for legal services performed by Otterbourg professionals have been reduced by 10% from the aggregate recorded time charges for all project codes, except for those relating to the Beechwood Action and the Arbitration, for which Applicants have applied a 25% discount to the aggregate recorded time charges, subject to the right of Applicants to request a partial repayment of the discount later in the case. In addition, the Receiver has agreed to provide a further discount in an amount that represents the increase in her fees since her appointment. (In accordance, with Otterbourg's regular practice, its hourly rates are reviewed and potentially increased on October 1<sup>st</sup> of each year.)

Pursuant to the public service and rate increase accommodations described above, the recorded time charges for the Receiver have been reduced from \$106,250.00 to \$67,660.00, a reduction in the amount of \$38,590.00. Moreover, the recorded time charges for the Otterbourg professionals have been reduced from \$1,218,824.50 to \$966,801.82, a reduction in the amount of \$252,022.68. Therefore, the total reduction for legal fees incurred during the Eighth Application Period by the Receiver and Otterbourg professionals is \$290,612.68.

All non-working travel time is billed at half of the amount of the actual non-working travel time of the professional.

In addition, as required by the SEC Billing Guidelines, the Receiver and Otterbourg submitted the Eighth Interim Application to SEC counsel on October 18, 2019 to allow for a thirty-day review period and previously provided the SEC with its monthly time records.

This Eighth Interim Application includes certain exhibits:

(a) The SFAR for the period of April 1, 2019 through June 30, 2019 is attached as **Exhibit A** hereto.

(b) A Fee Schedule showing the total fees billed and hours worked during the Eighth Application Period by the Receiver and each Otterbourg professional, along with the billing rates of each such professional, is attached as **Exhibit B** hereto.

(c) In accordance with Section D.3.c of the SEC Billing Guidelines, a summary reflecting the total fees billed and the hours worked by the Receiver and each professional organized by project category, including a chart showing the amounts being requested after application of the accommodations discussed above, is attached as **Exhibit C** hereto.

(d) In accordance with the Section D.5 of the SEC Billing Guidelines, the time records of the Receiver and the Otterbourg professionals for the Eighth Application Period, arranged in chronological order within each activity category, are attached as **Exhibits D** and **E**, respectively, hereto.

(e) In accordance with Section E.1.a. of the SEC Billing Guidelines, a summary of all expenses for which Applicants seek reimbursement organized by expense category is attached as **Exhibit F** hereto.

(f) In accordance with Section E.1.a. of the SEC Billing Guidelines, the expense records of the Receiver and Otterbourg for the Eighth Application Period, arranged in chronological order, are attached as **Exhibits G** and **H**, respectively, hereto.

(g) Also submitted herewith as **Exhibit I** is the Certification required by Section A.1 of the SEC Billing Guidelines.

This is the Receiver and Otterbourg's eighth request for fees and expenses in this case. Otterbourg received no retainer in this case and the Receivership Order limits the Receiver and Otterbourg to obtaining compensation solely from the Receivership Estate.

The Receivership Order permits the Receiver and her advisors to be paid on a quarterly basis. In accordance with the SEC Billing Guidelines, and as noted above, the Receiver and Otterbourg submitted its time records for the Eighth Interim Application to SEC counsel prior to filing the Application with the Court, and SEC counsel has reviewed the Application.

The Receiver and Otterbourg professionals recorded all services performed in time increments of one tenth (0.1) of an hour. All services by Otterbourg paralegals and other paraprofessionals were professional in nature and, if not performed by the indicated paraprofessionals, would have been performed by attorneys.

Seven attorneys and three paraprofessionals billed time during the Eighth Application Period (in addition to the Receiver). A core team of attorneys performed the lion's share of the services, including Adam Silverstein, Philip C. Berg, William Moran, Erik B. Weinick, Jennifer S. Feeney, Andrew Halpern and Gabriela Leon.<sup>9</sup> Because of the diversity of issues confronting the Receiver, this case necessitated the involvement of additional attorneys with background and experience in the multitude of litigation and transactional disciplines relevant to this

---

<sup>9</sup> The Receiver has voluntarily not billed the time of any professional that billed less than fifteen (15) hours to the case during the Eighth Application Period.



receivership. In addition, while several senior attorneys were utilized, each brought different expertise to the engagement and was the primary responsible party on different tasks. Because of the shift in the Receivership from the sale of assets to the pursuit of recoveries through litigation, the bulk of the hours billed were performed by litigation attorneys who are actively involved in the Beechwood Action and/or the Arbitration.

The particular Otterbourg professionals who billed time during the Eighth Application Period and their specific roles were as follows:

(a) Adam C. Silverstein (Partner) (5.4 Hours to P01; 18.0 Hours to P04; 1.5 Hours to P10; 5.3 Hours to P14; 94.8 Hours to P15) – Mr. Silverstein is a senior litigator who has focused his efforts on Receivership matters requiring applications to the Court, litigation services, and the forensics investigation. Mr. Silverstein dedicated most of his time during the Eighth Application Period to matters relating to the Arbitration. Mr. Silverstein also assisted with applications to the Court. Mr. Silverstein has also been one of the point persons regarding communications with the SEC during the Eighth Application Period.

(b) William Moran (Partner) (1.6 Hours to P01; 5.5 Hours to P10; 144.1 Hours to P14; 1.2 Hours to P15) – Mr. Moran is a senior litigator who has focused his efforts on Receivership matters relating to the Receiver's litigation activities. In particular, Mr. Moran has primarily assisted with the Beechwood Action during the Eighth Application Period.

(c) Philip C. Berg (Partner) (36.7 Hours to P01; 30.4 Hours to P02; 4.0 Hours to P04) – Mr. Berg is a senior transactional partner and Chairman of Otterbourg's Corporate Department, whose focus has been the negotiation, documentation and closing of Receivership transactions. During the Eighth Application Period, Mr. Berg reviewed and negotiated all documents relating

to the sale of assets and reviewed other corporate documents that were necessary in connection with the review and possible sale of Platinum assets.

(d) Jennifer S. Feeney (Of Counsel) (39.2 Hours to P01; 32.2 Hours to P02; 82.4 Hours to P04; 1.1 Hours to P05; .4 to P14) – Ms. Feeney is a senior member of Otterbourg’s bankruptcy department and provides specific bankruptcy-related counsel to the Receiver. During the Eighth Application Period, Ms. Feeney spent time with respect to the Arabella bankruptcy case, including attention to the remaining items necessary to close-out this asset. Ms. Feeney also attended to other case administration matters, including preparing the Receiver’s quarterly report and updating other reports regarding the status of asset dispositions. Additionally, Ms. Feeney, along with Erik B. Weinick, prepared applications to the Court and worked to keep the Receiver apprised of all activities being undertaken by the Receivership Team and the Receiver’s other professionals.

(e) Erik B. Weinick (Of Counsel) (80.0 Hours to P01; 26.7 Hours to P02; 51.6 Hours to P04; .9 Hours to P05; 3.8 Hours to P10; 214.9 Hours to P14) – Mr. Weinick is a senior litigator and is also a member of Otterbourg’s bankruptcy department. He has served as the Receiver’s “hub and spoke,” coordinating, along with Jennifer S. Feeney, the work of the Receiver’s professionals and Platinum’s in-house employees on almost every matter confronting the Receivership from asset dispositions, to affirmative and defensive claims (including appearing in court on behalf of the Receiver), and administrative matters, including responding to investor inquiries, responding to requests from the Defendants and communicating with counsel for the PPVA on matters of mutual interest. Mr. Weinick is also the attorney primarily responsible for the Beechwood Action and spent significant time during the Eighth Application

Period preparing the Receiver's response to the motions to dismiss, coordinating discovery and attending to other matters relating to the Beechwood Action.

(f) Andrew S. Halpern (Associate) (2.6 Hours to P10; 241.1 Hours to P14; 252.7 Hours to P15) – Mr. Halpern is an experienced litigator, particularly in the areas of claims of professional malpractice and fraudulent conveyance and forensic analysis. As such, Mr. Halpern continued his work in both the Beechwood Action and the Arbitration, as well as preparing tolling agreements for other third parties. Mr. Halpern spent significant time responding to the motions to dismiss in the Beechwood Action and the completion of document production in the Arbitration.

(g) Gabriela S. Leon (Associate) (.8 Hours to P04; .6 Hours to P10; 221.7 Hours to P14; 49.1 Hours to P15) – Ms. Leon is a junior associate in the litigation department. Ms. Leon was utilized to research issues relating to both the Beechwood Action and the Arbitration, in addition to assisting with the preparation and review of pleadings. Ms. Leon also assisted with research related to other motions made to the Court, all at a considerably lower billing rate.

(h) Christine O'Brien (Paralegal) (.7 Hours to P04; 21.9 Hours to P14; 3.6 Hours to P15) – Ms. O'Brien is an experienced litigation paralegal. Ms. O'Brien primarily assisted with the production of documents and the receipt of documents produced to the Receiver in connection with ongoing litigation.

(i) Jessica Hildebrandt (Paralegal) (.7 Hours to P01; .1 Hours to P02; 25.3 Hours to P04; 2.9 Hours to P10; 113.6 Hours to P14; 4.9 Hours to P15) – Ms. Hildebrandt is a paralegal and has assisted the Otterbourg attorneys with certain research issues (which are suitable for a paralegal at a lower billable rate), helped prepare the Otterbourg attorneys for various hearings and court filings, and monitored the criminal docket for the Receivership Team.

(j) Anthony Williams (Managing Clerk) (12.8 Hours to P04; 10.6 Hours to P14) – Mr. Williams is Otterbourg’s managing clerk and has assisted the Otterbourg attorneys with court filings, monitoring of dockets, obtaining court papers, and calendaring relevant dates.

**IV. SERVICES RENDERED BY RECEIVER AND OTTERBOURG DURING EIGHTH APPLICATION PERIOD**

In accordance with Section D.3 of the SEC Billing Guidelines, Applicants segregated their time during the Eighth Application Period into seven (7) project categories.<sup>10</sup> Narrative summaries of these activity categories follow:

- A. Asset Analysis and Recovery (P01) - Total Fees: \$166,358.50  
Asset Disposition (P02)<sup>11</sup> - Total Fees: \$75,787.00**

During the Eighth Application Period, the Receiver and her professionals continued to review the remaining assets in the portfolio. Certain assets are still embroiled in litigation and/or bankruptcy proceedings and actions have been taken by the Receiver and the Receivership Team to position such assets so that they can eventually be monetized. In certain instances, time was also spent with respect to an asset that may not ultimately have a positive return to the Receivership Estate, but work is still required to reduce potential liabilities and exposure to the Receivership Estate, as well as to ensure that any such asset without value is not imprudently abandoned by the Receivership Estate.

During the Eighth Application Period, Applicants continued to analyze the remaining assets in Platinum’s portfolio, including in-person and telephonic meetings with her team of professionals and staff, as well as, in some instances, management and other investors in the underlying asset, including counsel to PPVA. Also included in the time billed during the Eighth

---

<sup>10</sup> As noted above, **Exhibit C** hereto shows each professional working on a particular project category and the total hours he or she billed in that category prior to the agreed-upon reduction to the aggregate recorded time charges. The fees for each activity category are stated herein *without* showing the agreed upon reductions.

<sup>11</sup> Because of the symbiotic nature of these two project categories, Applicants are describing the work done with respect to each in a combined narrative to allow the reader to better understand the tasks performed.

Application Period, are regular conferences with working groups of Otterbourg attorneys, memoranda prepared for the Receiver to enable her to analyze the asset and make a decision, and regular meetings with the Receiver and the Receivership Team to update the Receiver on activities with respect to each investment and other current tasks of the Receivership.

To keep the Receiver and the Receivership Team apprised of all activities with respect to each investment, cash activity, and other matters on which the Receivership Team was working, the Receiver scheduled regular (approximately every two weeks) team meetings with her team of professionals and staff, Otterbourg, Goldin, and Platinum's General Counsel and Chief Financial Officer. In advance of these meetings, Applicants reviewed with members of the Receivership Team which matters were active and needed to be discussed with the Receiver, and prepared an Agenda for maximum efficiency. These meetings were and are critical to maintaining a comprehensive and organized approach to understanding and developing a strategic plan for liquidating the remaining Platinum portfolio. Goldin also prepared regular updates on the status of the remaining assets in the Platinum portfolio and current disposition options, which Applicants reviewed.

Below is an overview of certain of the investments in which Applicants have dedicated time during the Eighth Application Period. The below summaries include a brief description of the nature of the investment, work performed, and status.

1. **Accutane** - refers to a litigation financing investment by a Platinum related entity in a products liability litigation currently on appeal before the Supreme Court for the State of New Jersey. PPCO has been engaged in a dispute with two insurance companies insuring up to a \$4.5 million return on the litigation finance investment. The PPCO subsidiary made a claim under the insurance policy for the \$4.5 million which was initially denied by the insurers. The

parties then commenced informal discovery after which they entered into arms' length negotiations to resolve their dispute without court intervention. Following the Eighth Application Period, the Receiver settled with the insurance companies for \$1.8 million to resolve the dispute without litigation. During the Eighth Application Period, Applicants and in-house spent reviewing documents produced by the insurer and had multiple calls with the insurance carrier's counsel. Otterbourg attorneys who have billed time to this matter include attorneys with litigation experience.

2. **Agera** – refers to Agera Energy LLC and Agera Holdings, LLC (collectively, "Agera"). Agera is a retail energy service company. In June 2016, prior to the receivership, Principal Growth Strategy, LLC ("PGS"), which is owned 55% by PPVA and 45% by PPCO, sold a portion of its interests in Agera to certain entities affiliated and/or associated with Beechwood Re Investments LLC.

Pursuant to their respective interests in PGS, both PPVA and PPCO agreed to pursue certain claims and causes of action relating to PGS's ownership of a certain promissory note convertible into 95% of the common equity of energy reseller Agera Energy (the "Agera Claims"). In connection with such agreement, a complaint was filed in the Court of Chancery of the State of Delaware on June 7, 2019 against numerous defendants, including AGH Parent LLC, Senior Health Insurance Company of Pennsylvania and CNO Financial Group, Inc. The case was subsequently removed to the United States District Court for the District of Delaware, where a motion to remand is currently pending. The Case No. is 19-cv-01319-CFC.

During the Eighth Application Period, Applicants reviewed and commented on draft term sheets to fund the litigation, reviewed the litigation funding agreement, coordinated with PPVA on case strategy and reviewed and commented upon the draft complaint. Otterbourg attorneys

who have billed time to this matter include attorneys with litigation experience and transactional experience.

3. **ALS Life Settlements (Lincoln/Rosenberg Litigation)** – refers to a portfolio of life settlement investments that were owned through an entity in which PPCO is the majority owner and managing member. All but one policy in the portfolio was previously sold by the Receiver. The one insurance policy that was not sold has a total death benefit of \$8.5 million (with ALS entitled to \$7.2 million of that total). The Receiver believes that the insurance company – Lincoln Life – improperly lapsed this policy prior to the Receiver’s appointment. The insured under the policy (Rosenberg) subsequently passed away, leaving the potential death benefit in dispute. The Receiver commenced an action in the United States District Court for the Eastern District of New York and retained contingency counsel. A back-end beneficiary under the policy (who the Receiver named as a nominal defendant because it was a necessary party to the litigation) filed counterclaims against the Receiver, seeking a ruling that it is entitled to 100% of the death benefit in the event that the Court determines that the Receivership somehow caused the alleged lapse.

During the Eighth Application Period, Applicants worked with contingency counsel to Receiver’s Reply in Support of the Motion to Dismiss the counterclaims asserted by the back-end beneficiary, which the Receiver believes are without merit and are legally deficient. Applicants also spent time responding to discovery requests. Otterbourg attorneys who have billed time to this matter include attorneys with litigation experience and their role was primarily to monitor and interface with contingency counsel and to assist with responses to discovery.

4. **American Patriot Gold** – refers to Platinum’s formerly held ownership interest, through Maximilian Resources LLC (“Maximilian”), in approximately 370 acres of land fee

simple, in addition to mining claims in Montezuma County, Colorado. American Patriot Gold ran the Red Arrow Mine on the property until its mining permit was revoked in March 2014 as a result of non-payment of restitution for environmental and operational violations.

Based upon Conway MacKenzie's due diligence, obtaining permits and selling the asset as a working gold mine was determined not to be an economical option due to the significant cost and timeframes involved. Accordingly, the Receiver retained a local broker, with the authority of the Court, and the broker actively marketed the property. Two bids were received and an auction was held on March 11, 2019. At the auction, the winning bid was \$300,000 minus a \$20,000 credit for certain environmental remediation, which represented an \$80,000 increase above the initial bid. The Receiver filed a motion to approve the sale to the winning bidder and the Court entered an order approving the sale on March 22, 2019 [Dkt. No. 457]. The sale closed on April 3, 2019. After taking into account the environmental remediation credit and payment to the broker of its 8.5% fee, the Receivership Estate received net cash of \$251,679.

The majority of the work done with respect to this asset occurred during the prior Eighth Application Period. During the Eighth Application Period, Applicants attended to the closing of the sale and certain post-closing matters.

5. **Arabella** – refers to three entities each containing Arabella in their names. In 2014, PPCO made a \$16 million loan to Arabella Exploration, Inc. (“AEI”) pursuant to a \$45 million facility (the “Loan”). The Loan was secured by all of AEI's assets, and was guaranteed and secured by the assets of AEI's subsidiaries, Arabella Exploration, LLC (“AEX”) and Arabella Operating, LLC (“AO” and, together with AEX and AEI, “Arabella”). Arabella had working interests in certain leased oil and gas properties in the Permian and Delaware Basins in Texas. AEX and AO are debtors in bankruptcy proceedings in the U.S. Bankruptcy Court for the



Northern District of Texas (the “Texas Bankruptcy Court”) and a liquidation proceeding in the Cayman Islands (which has been recognized in a Chapter 15 case pending in the Texas Bankruptcy Court). Platinum filed claims in Arabella’s bankruptcy proceedings in an amount of \$20,061,589.

Arabella’s plan of reorganization was confirmed by the Texas Bankruptcy Court and the sale of assets closed at the end of 2018. From the sale proceeds, payments will be made by Arabella to certain third parties pursuant to settlement agreements entered into by Arabella with parties that had claimed an interest in Arabella’s assets. In addition, payments were made to the broker and the taxing authorities, and payments will also be made to certain lienholders with interests senior to those of Platinum, priority and administrative claimants and Arabella’s retained professionals, all entitled to be paid before Platinum will receive its share of the proceeds. As of the beginning of the Eighth Application Period, there were several issues that remained open before Arabella could conclude its bankruptcy case

During the Eighth Application Period, Applicants worked with Arabella to resolve the remaining open issues. Applicants had frequent telephonic and e-mail communications with Arabella’s retained professionals, including its CRO, bankruptcy counsel and litigation counsel regarding (i) claims made by a handful of parties claiming to have materialman’s (oil) liens superior to those of Platinum (the “M&M Liens”); (ii) a non-operating former owner, which claims to be owed money from Arabella (Arabella asserts that these claims were released in a prior settlement); and (iii) a motion made by the liquidating trustee of AEI (the Cayman parent to the operating subsidiaries) seeking payment of his and his professionals’ fees on the grounds of substantial contribution to the Arabella bankruptcy case (the “Substantial Contribution Claim”). Applicants reviewed the M&M Liens analysis, the mediations statements and assisted with

preparing for the mediation of the M&M Liens. Applicants also worked with Goldin to analyze various liquidation scenarios and claims and liens that may come ahead of those of Platinum to ascertain the potential best case and worst case recovery scenarios. Applicants continued to have discussions with the joint liquidators of the parent company in the Cayman Islands regarding the Substantial Contribution Motion, preparation of discovery requests and discussions to mediate the issue. Otterbourg attorneys who have billed time to this matter include attorneys with experience in bankruptcy and litigation.

6. **LC Energy** – refers to LC Energy Holdings, LLC, the owner of the Goldstar Coal Mine in Green County, Indiana, which is wholly owned by PPCO. PPCO acquired its ownership interest in the mine in March 2014 in the bankruptcy case of In re Lily Group, Inc., Case No. 13-81073 (Bankr. S.D. Ind.). The Mine is currently idled.

During the Eighth Application Period, Houlihan Lokey thoroughly and diligently marketed the Mine. To that end, Houlihan contacted nine local strategic buyers, all of whom but one declined to bid. The one offer received for LC Energy was predicated on the Receivership Estate paying the buyer for potential environmental liabilities, which the bidder believed may well exceed any short-term future production from the mine. The Receiver has since met and conferred with Houlihan Lokey, her financial advisors, her local Indiana bankruptcy and environmental counsel, and certain other interested parties, to determine how best to dispose of the Mine without the prospect of a ready, willing and able buyer for the mine. This analysis included a review of the potential remediation liabilities of LC Energy and the responsibilities of the operator with respect to such liabilities.

Subsequent to the Eighth Application Period, to avoid potential liabilities with respect to the Mine (even if abandoned), including purported liabilities to ERC Mining Indiana Corp.

(“ERC”), in its capacity as manager of the Mine, the Receiver and ERC entered into an Asset Purchase Agreement dated August 16, 2019 (the “APA”). Pursuant to the APA, LC Energy sold the Mine to ERC and ERC agreed to assume any and all current and future clean-up and other remediation costs at the Mine in consideration for a payment by LC Energy to Purchaser of \$380,000 and an assignment to Purchaser of the \$250,000 in cash collateral that had secured a bond in favor of the State of Indiana. The APA was approved by the Receivership Court and the sale of the Mine closed during the third quarter of this year.

During the Eighth Application Period, Applicants discussed with Houlihan Lokey the results of its marketing efforts, had several conference calls with local Indiana bankruptcy and environmental counsel to review options available and to minimize further expense, reviewed the analysis prepared by environmental counsel regarding applicable Indiana statutory regulations and other legal issues applicable to the asset, spoke to the one bidder who is seeking payment from LC Energy for potential environmental liabilities and spoke with the permittee of the Mine. Otterbourg attorneys regularly updated the Receiver on the status of these efforts. Otterbourg attorneys who have billed time to this investment primarily include attorneys with litigation, transactional and bankruptcy experience.

7. **NJ Ethanol LLC** – refers to a company that built a small-scale plant in New Jersey to convert food waste into food- and pharmaceutical-grade ethanol. The business failed and the plant was closed. PPCO owns Class B preferred and common stock. These shares have limited marketability outside of a sale back to the company. During the Eighth Application Period, the Receivership Team continued discussions to sell Platinum’s interests in NJ Ethanol on an “as is” basis to the company’s principal for \$75,000. During the Eight Application Period, Applicants prepared a draft Securities Purchase Agreement. The sale has not yet closed.

Otterbourg attorneys regularly updated the Receiver on the status of these efforts. Otterbourg attorneys who have billed time to this investment primarily include attorneys with transactional experience.

8. **Securities Dispositions** – Applicants coordinated with Goldin on the status of the sale of a handful of securities with limited marketability, including seeking the assistance of foreign brokers to help with the sale of securities registered in foreign jurisdictions. Applicants also reviewed a confidentiality deed in connection with the possible sale of the Receiver's interest in a royalty in Cokal.

**B. Case Administration (P04) - Total Fees: \$192,168.00**

This category includes tasks that may not be directly related to a specific investment or transaction, but impact the overall administration of the Receivership Estate, including communications with investors, preparing motions relating to the administration of the Receivership Estate, addressing internal business and administrative issues at Platinum and litigation relating to current or prior assets in the Receivership portfolio. The nature of the tasks performed under this category is varied, and includes the following:

1. **Investor Communications.** During the Eighth Application Period, Applicants continued to revise and update the Receiver's website (PlatinumReceivership.com), which provides investors and other interested parties with, among other things, periodic status reports, access to court documents and answers to frequently asked questions. The Receiver and the Receivership Team have attempted to respond to investor inquiries and continue to regularly respond and react to inquiries and requests for information. Applicants also prepared the Seventh Status Report of the Receiver during the Eighth Application Period.

2. **Defendants.** During the Eighth Application period, the Receiver continued to monitor the criminal trial of Mark Nordlicht, David Levy and Joseph SanFilippo to analyze any impact those proceedings may have on the Receivership.

3. **Employees.** During the Eighth Application Period, the Receiver responded to the Motion of a former Platinum employee, Samuel Salfati, seeking Allowance and Payment of Administrative Expense Claim. [Dkt. Nos. 465, 472] Mr. Salfati was seeking the immediate and full payment of a pre-receivership claim based upon a Retention Agreement entered into with Prior Management that was rejected by the Receiver when Mr. Salfati was terminated. The Receiver filed papers in opposition to Mr. Salfati's motion on the basis of, among other things, that Mr. Salfati is not entitled to payment at this time of a pre-Receivership claim. On July 17, 2019, the Court entered an order denying Mr. Salfati's motion. [Dkt. No. 480]

4. **Schafer & Weiner.** On September 25, 2018, the Court issued its Memorandum Decision and Order denying Schafer & Weiner's ("S&W") fee application and reserving judgment on the Receiver's cross-motion seeking disgorgement of the pre-Receivership fees paid to S&W. [Dkt. No. 383] S&W then appealed that decision to the U.S. Court of Appeals for the Second Circuit. During the Eighth Application Period, Applicants continued to participate in the Second Circuit's mandatory mediation conference (CAMP) and engaged in conversations with S&W and the SEC regarding a possible resolution of the appeal and the Receiver's cross-motion. The CAMP process did not lead to a resolution of issues with S&W, and has come to a conclusion. The parties continue to discuss a resolution.

5. **SEC Meetings.** Applicants communicated as warranted with the SEC staff to keep them apprised of ongoing matters as to which SEC input is appropriate and to alert them to certain filings by the Receiver. The Receiver and the Receivership Team also met in person with

the SEC during the Eighth Application Period. Applicants also had periodic communications with SEC personnel about pending matters before the Court for which SEC input was appropriate.

6. **PPVA.** The Receiver and the Receivership Team had periodic teleconferences and in-person meetings with the Joint Liquidators for the PPVA Master Fund and the PPVA Feeder Fund and/or their staff to discuss issues of mutual interest, including jointly held assets, the Beechwood Action, a related Chapter 15 bankruptcy proceeding and additional claims that may be jointly held, such as the Agera Claims. Otterbourg also continued to discuss procedures regarding access to documents held on the Platinum mainframe and the production of documents in connection with the ongoing litigations.

7. **Subpoenas.** Applicants also spent time during the Eighth Application Period responding to subpoenas on a variety of matters.

8. **Retention of Professionals.** During the Eighth Application Period, Applicants prepared an application to retain experts in connection with the Arbitration and, if necessary, the Beechwood Action. The Application was approved by the Court during the Eighth Application Period. Applicants also monitored the work of the ordinary course professionals and the status of payments to such professionals to stay within the previously entered order approving the retention of ordinary course professionals.

9. **Receiver Oversight.** Time during the Eighth Application Period was also devoted to the general oversight of the Platinum Entities and the Receivership Estate. Conferences with the Receiver and members of the Receivership Team occurred on a daily basis to facilitate the exchange of relevant information and to avoid duplication of effort. The Receivership Team meets with the Receiver bi-monthly to discuss ongoing asset disposition,

litigation, claims and other administrative matters, and prepared agendas and reviewed assets for discussion in advance of the meetings. The Receiver maintained direct oversight over all the legal and financially-related work being done by her Receivership Team. Otterbourg attorneys assisted the Receiver, along with assistance from internal management and Goldin, in analyzing budget, cash management and tax issues.

**C. Claims Administration Work (P05) – Total Fees: \$1,574.00**

Pursuant to the previously approved bar date procedures motion, the bar date to file a proof of claim asserting a claim arising before the Receivership was March 29, 2019 and the bar date for governmental units to file a proof of claim was April 12, 2019. Parties holding investor claims, claims for unpaid redemptions and administrative claims were not required to file proofs of claim. In addition, the Receiver has claims that may have been filed with the Prior Receiver. In total, 327 claims were filed prior to the bar date. Some of these claims may be duplicate claims and some may be asserted against non-Receivership Entities. The Receivership Team has preliminarily reviewed the filed claims, but has not yet done an in depth analysis of each claim, including which claims may be the subject to an objection and disallowance. Applicants did not devote significant time to the claims review process during the Eighth Application Period other than to review the bar date order and to respond to inquiries regarding the status of claims. At this time, Platinum's in-house team is conducting the initial review and analysis of claims as Applicants focus on the Receiver's efforts to void the purported blanket liens on assets.

**D. Forensic/Investigatory Work (P10) - Total Fees: \$11,585.50**

In addition to the monetization of assets, potential sources of recovery include claims by the Receiver as innocent successor to the Platinum Entities against possible liable parties. The bulk of the investigatory work to date has resulted in the commencement of the Arbitration and

the Beechwood Action (both discussed below). In addition, the Receiver continues to review additional causes of action that could be asserted. The analysis also includes transfers from Platinum and the value of the assets it transferred and consideration given in return. In addition, during the Eighth Application Period, Applicants entered into additional tolling agreements or reviewed and renewed tolling agreements that were set to expire. The tolling agreements will allow the Receiver and the Receivership Team the appropriate time to investigate potential claims. The Receiver also issued certain subpoenas for the production of documents, which were prepared by Applicants during the Eighth Application Period.

**E. Beechwood Action (P14) – Total Fees: \$585,851.50**

On December 19, 2018, the Receiver commenced the Beechwood Action in the Southern District of New York against (i) certain so-called Beechwood entities, (ii) Senior Health Insurance Company of Pennsylvania, (iii) Fuzion Analytics, Inc., (iv) CNO Financial Group, Inc., (v) Bankers Consec Life Insurance Company, (vi) Washington National Insurance Company and (vii) 40|86 Advisors, Inc. The case is captioned “*Melanie L. Cyganowski, as Equity Receiver for Platinum Partners Credit Opportunities Master Fund LP, et al. v. Beechwood RE Ltd., et al.*” and is pending as Case 1:18-cv-12018 in the United States District Court for the Southern District of New York. The Receiver exercised her right under the applicable rules and orders of the Court to amend the original filed complaint, and on March 29, 2019, the Receiver filed an amended complaint. A copy of the redacted amended complaint filed in the Beechwood Action may be accessed on the Receiver’s website ([www.PlatinumReceivership.com](http://www.PlatinumReceivership.com)). The summary here is not intended to alter or recast any of the substantial allegations in the complaint.



The Receiver's complaint (subsequently amended) seeks redress for an alleged scheme perpetrated to the detriment of Platinum and its innocent investors by certain criminally charged managers of Platinum. Specifically, in the complaint, the Receiver alleges, among other things, that through the creation of what was a thinly disguised independent reinsurance entity, Beechwood, the Platinum insiders, fueled with money knowingly or recklessly contributed by the defendants, were able to prolong and expand a scheme that personally enriched the insiders through the generation of tens of millions of dollars in management fees, incentive fees, false profits and other remuneration over the years.

Certain of the defendants named in the Receiver's amended complaint were alleged to have substantially assisted, and participated with, Beechwood and the Platinum insiders to commit fraud and breach their fiduciary duties to the PPCO Funds. Specifically, these defendants – acting through Beechwood – structured and implemented a series of transactions that ultimately saddled the PPCO Funds with approximately \$69.1 million of debt owing to Beechwood, as agent for the insurers, secured by purported liens on substantially all of the PPCO Funds' assets, including those of nearly all of their portfolio companies, in consideration for assets that were worth a fraction of that amount.

For these reasons, the Receiver asserted causes of action for, among other things, (i) violations of the Racketeer Influenced and Corrupt Organizations Act and/ or federal securities fraud; (ii) aiding and abetting common law fraud; (iii) aiding and abetting breach of fiduciary duty; (iv) actual and constructive fraudulent conveyances; and (v) unjust enrichment. In addition to seeking to avoid the purported first-priority liens asserted against PPCO Funds' assets by certain defendants that may otherwise adversely impact potential distributions to investors and creditors, the Receiver seeks monetary damages.

Each of the defendants in the Beechwood Action filed motions to dismiss the Amended Complaint. The hearing on the motions to dismiss took place on August 15, 2019. Shortly thereafter, Judge Rakoff issued a “bottom line” decision, which, while dismissing certain of the Receiver’s causes of action, sustained certain of her causes of action including, among others, claims to set aside the liens currently preventing a distribution of estate assets and for unjust enrichment. On October 7, 2019, Judge Rakoff issued a 177-page opinion setting forth the reasons for his decision. The parties are now fully immersed in discovery, including the exchange of documents and fact and expert depositions. Discovery is to conclude on December 31, 2019, followed by summary judgment motions and a trial sometime in late spring 2020.

During the Eighth Application Period, Applicants spent time issuing the necessary summonses, negotiating the 502(d) Stipulation, producing documents and reviewing documents that had been produced, participating in multiple discovery calls with the defendants, negotiating a briefing schedule and attending to certain privilege issues in connection with the production of documents. Applicants also reviewed the motions to discuss and analyzed the legal and factual issues raised by each. Applicants responded to the motions to dismiss, including researching additional legal issues and gathering additional facts to buttress the claims asserted in the Amended Complaint.

**F. Arbitration (P15) – Total Fees \$294,125.00**

On April 27, 2018, the Receiver timely commenced a confidential arbitration against an accounting firm and its affiliate (collectively, the “Accounting Firms”) that provided audit services to certain of the Receivership Entities, claiming that the Accounting Firms committed negligence in conducting audits of the financial statements of certain of the Receivership Entities (the “Audited Platinum Entities”) for the fiscal year ended December 31, 2014, and that the

Accounting Firms breached their contractual obligations to the Audited Platinum Entities in connection with those audits. The Receiver seeks monetary damages in an amount to be determined by the arbitration panel. The arbitration is before a tribunal of three neutral arbitrators, and, subject to the resolution of disputes, recently completed the discovery phase. On June 25, 2019, the Accounting Firms submitted a dispositive motion for summary judgment seeking the dismissal of all of the Receiver's claims. The Receiver submitted her response on July 25, 2019. The Accounting Firms submitted their reply papers on August 9, 2019. Depositions were taken and completed between September 6th and 20th. The argument date on the motion had been scheduled for September 24, 2019, but, unfortunately, the Chairperson of the arbitration panel passed away on September 10, 2019. On October 17, 2019, a new Chairperson was appointed, and argument on the motion is scheduled to take place on November 21, 2019. A hearing is currently scheduled for April 13, 2020. Because of confidentiality restrictions, no further information regarding the arbitration can be provided at this time, including the identity of the Accounting Firms.

During the Eighth Application Period, Applicants spent time reviewing the documents to be produced to the Accounting Firms, worked with the Receiver's retained experts, prepared subpoenas and document requests and participated in conferences regarding discovery disputes. Applicants also continued to research factual and legal issues in connection with the Accounting Firms' motion for summary judgment and began to prepare the Receiver's response to the motion. Applicants also corresponded with the arbitration panel and strategized on the response to the motion for summary judgment and the Arbitration in general.

## **V. EXPLANATION OF EXPENSES AND RELATED POLICIES**

Applicants seek reimbursement of its out-of-pocket costs in the amount of \$17,142.87. **Exhibit F** sets forth the various categories of expenses for which Otterbourg seeks

reimbursement. Applicants will retain the documentation supporting these expenses for a period of seven years in accordance with the SEC Billing Guidelines and will provide the SEC with copies upon request.

Applicants observed the following policies in connection with its expenses during the Eighth Application Period:

(a) In accordance with Section E.2.b. of the SEC Billing Guidelines, Applicants seek reimbursement for photocopying and laser printing expenses performed in-house (listed as Photocopies and Laser Copies in **Exhibit F**) at a rate of \$.15 per page. Otterbourg made 23,611 internal laser copies and photocopies during the Eighth Application Period at the rate of 0.15 cents per page, totaling \$3,541.65 for all in-house copies.

(b) In accordance with Section E.2.g., Applicant would normally seek reimbursement of outgoing facsimile charges at a rate of \$1.00 per page for outgoing transmissions. However, Otterbourg did not make any outgoing facsimile transmissions during the Eighth Application Period. Similarly, Otterbourg has not received any incoming facsimile transmissions, nor would it seek to charge anything for them.

(c) With respect to all expenses, Applicants seek reimbursement only for the actual cost of its filing and court reporting fees, postage and overnight delivery fees and long distance telephone charges. Applicants have not included in any request for expense reimbursement the amortization of the cost of any investment, equipment or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth in the SEC Billing Guidelines). Whenever possible, Applicants have used email to transmit documents via portable document format, thereby reducing facsimile, overnight courier and copying costs otherwise chargeable to the Receivership Estate.

(d) In accordance with Section E.2.h of the SEC Billing Guidelines, Applicants have charged for computerized research only to the extent of the actual discounted invoiced cost of its vendor, Westlaw.

(e) In accordance with Section E.2.j. of the SEC Billing Guidelines, Applicants have neither sought reimbursement for local travel expenses for late night travel home or travel to court (including mileage, taxis, etc.) nor for meals.

(f) In accordance with Section E.2.K of the SEC Applicants have not sought reimbursement for secretarial, word processing, proofreading or document preparation expenses (other than by professionals or paraprofessionals), data processing and other staff services (exclusive of paraprofessional services) or clerical overtime.

(g) The Receiver has created a website to provide updates to investors and other interested parties and to answer frequently asked questions. This service is only charged to the extent of the invoiced cost from the vendor Epiq (formerly GCG), which will be billed directly to the Receivership Estate.

(h) In some instances, cost incurred during a particular application period will not be reflected in Applicants' records until a subsequent application period. Applicants will seek reimbursement for such "trailing" expenses in subsequent fee application periods.

## **VI. FACTORS TO BE CONSIDERED BY THE COURT IN AWARDING FEES**

The case law on equity receiverships sets forth the standards for approving receiver compensation and the fees and expenses for the receiver's counsel. This Court has discretion to determine compensation to be awarded to a court-appointed equity receiver and his or her counsel and "may consider all of the factors involved in a particular receivership in determining an appropriate fee." *Gaskill v. Gordon*, 27 F.3d 248, 253 (7th Cir. 1994). Many authorities (even if dated) provide "convenient guidelines", but in the final analysis, "the unique fact

situation of each case renders direct reliance on precedent impossible.” *Securities & Exchange Comm’n v. W.L. Moody & Co.*, 374 F. Supp. 465, 480 (S.D. Tex. 1974), *aff’d sub nom*, 519 F.2d 1087 (5th Cir. 1975).

In allowing counsel fees in Securities Act receiverships, “[t]he court will consider . . . the complexity of problems faced, the benefit to the receivership estate, the quality of work performed, and the time records presented.” *Securities & Exchange Comm’n v. Fifth Ave. Coach Lines, Inc.*, 364 F. Supp. 1220, 1222 (S.D.N.Y. 1973); *see also United States v. Code Prods. Corp.*, 362 F.2d 669, 673 (3d Cir. 1966) (court should consider the time, labor and skill required (but not necessarily expended), the fair value of such time, labor and skill, the degree of activity, the dispatch with which the work is conducted and the result obtained). “[R]esults are always relevant.” *Securities & Exchange Comm’n v. Elliott*, 953 F.2d 1560, 1577 (11th Cir. 1992) (quoting *Moody*, 374 F Supp. at 480). However, a good result may take a form other than a bare increase in monetary value. *Id.* (“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.”).

Another “basic consideration is the nature and complexity of the legal problems confronted and the skill necessary to resolve them.” *Moody*, 374 F. Supp. at 485. Moreover, “[t]ime spent cannot be ignored.” *Id.* at 483. Another “significant factor . . . is the amount of money involved.” *Id.* at 486; *see also Gasser v. Infanti Int’l, Inc.*, 358 F. Supp. 2d 176, 182 (E.D.N.Y. 2005) (receiver’s legal fees “must be reasonable in light of the services rendered by counsel and the amount of property held in the receivership”).

Under these standards, Applicants have adequately demonstrated that the amount of fees requested is appropriate. Applicants have acted quickly to take control of and monetize the

assets of the Platinum Entities. The ultimate benefit to investors, though not specifically quantifiable at this stage of the Receivership, will become more quantifiable as the case proceeds. Investors now have a forum in which they may present their views (including their criticisms) and monitor the Receiver's efforts to marshal the valuable assets of Platinum Entities to expeditiously dispose of these assets and generate a return for investors.

The issues being addressed by the Receiver and Otterbourg are highly complex and diverse. Many of the people with factual knowledge are facing criminal charges. Documentation, to the extent it exists, must be questioned and verified. Based on the foregoing, we respectfully submit that the compensation sought by the Receiver and Otterbourg is wholly warranted.

## **VII. HOLDBACKS**

The Receiver and Otterbourg are cognizant of the fact that the disposition of the all assets is not yet complete, that the claims reconciliation process is in process and that the litigations to address, among other things, the asserted blanket liens on Platinum's assets are ongoing. Accordingly, in an effort to preserve assets at this stage of the Receivership, Applicants have agreed to hold back twenty percent (20%) of the allowed fees requested in this Eighth Interim Application with respect to all project codes other than with respect to the fees approved for Otterbourg with respect to the Beechwood Action and the Arbitration, for which Applicants will hold back five percent (5%) in view of the additional fee accommodation being taken at this time with respect to those two project codes (collectively, the "Holdback Amount"). Accordingly, the total Holdback Amount for this Eighth Interim Fee Application if the requested fees are approved is \$109,287.20 (\$13,532.00 for the Receiver and \$95,755.20 for Otterbourg). All payments will be made from the Receivership assets.

WHEREFORE, PREMISES CONSIDERED, the Receiver and Otterbourg respectfully request that the Court:

(a) Grant interim approval of the Receiver's compensation in the amount of \$67,660.00 (the "Allowed Receiver Fees");

(b) Grant interim approval of Otterbourg's compensation in the amount of \$966,801.82 (the "Allowed Otterbourg Fees" and, together with the Allowed Receiver Fees, the "Allowed Fees");

(c) grant interim approval of Receiver's request for reimbursement of her out-of-pocket expenses in the amount of \$873.00;

(d) grant interim approval of Otterbourg's request for reimbursement of its out-of-pocket expenses in the amount of \$16,269.87;

(e) authorize the Receiver to immediately pay to Applicants from the Receivership assets (i) the Allowed Fees, less the Holdback Amount, plus (ii) 100% of the allowed out-of-pocket expenses of Applicants; and

(f) Grant such other relief as the Court deems appropriate.

Dated: November 26, 2019

Otterbourg P.C.

By: /s/ Adam C. Silverstein

Adam C. Silverstein

Jennifer S. Feeney

Erik B. Weinick

230 Park Avenue

New York, New York 10169

Tel.: (212) 661-9100

Fax: (212) 682-6104

asilverstein@otterbourg.com

On Behalf of Melanie L. Cyganowski, as Receiver,  
and Otterbourg P.C., as Counsel to the Receiver



**EXHIBIT A**

SFAR

**PLATINUM PARTNERS CREDIT OPPORTUNITIES MASTER FUND LP AND AFFILIATED ENTITIES**

## STANDARDIZED FUND ACCOUNTING REPORT

Reporting Period from 4/1/2019 to 6/30/2019

FUND ACCOUNTING (See Instructions)		Period from 4/1/2019 to 6/30/2019		
		PPCO	PPLO	Total
Line 1	Beginning Balance (As of 4/1/2019)	\$ 33,864,861	\$ 3,206,483	\$ 37,071,343
	<b><i>Increases in Fund Balance:</i></b>			
Line 2	Business Income	-	-	-
Line 3	Cash and Securities	-	-	-
Line 4	Interest/Dividend Income	-	-	-
Line 5	Business Asset Liquidation <sup>1</sup>	251,679	-	251,679
Line 6	Personal Asset Liquidation	-	-	-
Line 7	Third-Party Litigation Income	-	-	-
Line 8	Miscellaneous - Other	239,340	-	239,340
	<b>Total Funds Available (Lines 1-8)</b>	<b>\$ 34,355,880</b>	<b>\$ 3,206,483</b>	<b>\$ 37,562,362</b>
	<b><i>Decreases in Fund Balance:</i></b>			
Line 9	Disbursements to Investors/Claimants	-	-	-
Line 10	Disbursements for Receivership Operations	-	-	-
Line 10a	Disbursements to Receiver or Other Professionals	(90,504)	(2,575)	(93,079)
Line 10b	Business Asset Expenses	(420,976)	-	(420,976)
Line 10c	Personal Asset Expenses	-	-	-
Line 10d	Investment Expenses <sup>2</sup>	(160,025)	-	(160,025)
Line 10e	Third-Party Litigation Expenses	-	-	-
	1. Attorney Fees	-	-	-
	2. Litigation Expenses	-	-	-
	Total Third-Party Litigation Expenses	-	-	-
Line 10f	Tax Administrator Fees and Bonds	-	-	-
Line 10g	Federal and State Tax Payments	-	-	-
	<b>Total Disbursements for Receivership Operations</b>	<b>\$ (671,505)</b>	<b>\$ (2,575)</b>	<b>\$ (674,080)</b>
Line 11	Disbursements for Distribution Expenses Paid by the Fund	-	-	-
Line 12	Disbursements to Court/Other	-	-	-
	<b>Total Funds Disbursed</b>	<b>\$ (671,505)</b>	<b>\$ (2,575)</b>	<b>\$ (674,080)</b>
Line 13	Ending Balance (As of 6/30/2019)	\$ 33,684,375	\$ 3,203,908	\$ 36,888,283

(1) This amount consists primarily of proceeds derived from dispositions and collections associated with American Patriot Gold.

(2) This amount was disbursed to preserve the value of LC Energy.

# **EXHIBIT B**

## Fee Schedule by Professional

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS  
FOR THE STATEMENT PERIOD OF  
APRIL 1, 2019 THROUGH JUNE 30, 2019**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hrs.</b>	<b>Total Compensation<sup>1</sup></b>
Melanie L. Cyganowski ("MLC") Partner	1982	\$1250.00 <sup>2</sup>	85.0	\$106,250.00
Adam C. Silverstein ("ACS") Partner	1992	\$865.00	125.0	\$108,125.00
Philip C. Berg ("PCB") Partner	1992	\$840.00	71.1	\$59,724.00
William M. Moran ("WMM") Partner	1990	\$795.00	152.4	\$121,158.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$805.00	155.3	\$125,016.50
Erik B. Weinick ("EBW") Of Counsel	2002	\$765.00	377.9	\$289,093.50
Andrew S. Halpern ("ASH") Associate	1986	\$760.00	496.4	\$377,264.00
Gabriela S. Leon ("GSL") Associate	2019	\$295.00	272.2	\$80,299.00
Christine M. O'Brien ("CMO") Paralegal	N/A	\$295.00	26.2	\$7,729.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$295.00	147.5	\$43,512.50
Anthony Williams ("AW") Managing Clerk	N/A	\$295.00	23.4	\$6,903.00
	<b>TOTAL</b>		<b>1932.4</b>	<b>\$1,325,074.50</b>

<sup>1</sup> These amounts reflect the recorded fees prior to application of the agreed upon fee accommodations.

<sup>2</sup> The Receiver's hourly billable rate at the time of retention in July 2017 was \$995. As previously agreed with the SEC, the Receiver's aggregate fees have been reduced to discount for any increase in her billable rate since being retained.

# **EXHIBIT C**

## Fees by Project Code

**SUMMARY OF COMPENSATION BY PROJECT CODE FOR RECEIVER (WITH DISCOUNTS)**

<b>Project Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees Recorded</b>	<b>Billable Rate Accommodation<sup>1</sup></b>	<b>Public Service Accommodation<sup>2</sup></b>	<b>Total Accommodation</b>	<b>Total Fees Requested</b>
P01	Asset Analysis and Recovery	30.7	\$38,375.00	\$7,828.50	\$6,109.30	\$13,937.80	\$24,437.20
P02	Asset Disposition	3.1	\$3,875.00	\$790.50	\$616.90	\$1,407.40	\$2,467.60
P04	Case Administration	39.6	\$49,500.00	\$10,098.00	\$7,880.40	\$17,978.40	\$31,521.60
P14	Beechwood Litigation	8.2	\$10,250.00	\$2,091.00	\$1,631.80	\$3,722.80	\$6,527.20
P15	Arbitration	3.4	\$4,250.00	\$867.00	\$676.60	\$1,543.60	\$2,706.40
	<b>TOTALS:</b>	<b>85.0</b>	<b>\$106,250.00</b>	<b>\$21,675.00</b>	<b>\$16,915.00</b>	<b>\$38,590.00</b>	<b>\$67,660.00</b>

**SUMMARY OF COMPENSATION BY PROJECT CODE FOR OTTERBOURG (WITH DISCOUNTS)**

<b>Project Code</b>	<b>Project Category</b>	<b>Total Hours</b>	<b>Total Fees Recorded</b>	<b>Public Service Accommodation<sup>3</sup></b>	<b>Total Fees Requested</b>
P01	Asset Analysis and Recovery	163.6	\$129,733.50	\$12,973.35	\$116,760.15
P02	Asset Disposition	89.4	\$71,912.00	\$7,191.20	\$64,720.80
P04	Case Administration	195.6	\$136,418.00	\$13,641.80	\$122,776.20
P05	Claims Administration & Objections	2.0	\$1,574.00	\$157.40	\$1,416.60
P10	Forensics	16.9	\$11,585.50	\$1,158.55	\$10,426.95
P14	Beechwood Litigation	973.6	\$575,601.50	\$143,900.38	\$431,701.12
P15	Arbitration	406.3	\$292,000.00	\$73,000.00	\$219,000.00
	<b>TOTALS:</b>	<b>1847.4</b>	<b>\$1,218,824.50</b>	<b>\$252,022.68</b>	<b>\$966,801.82</b>

<sup>1</sup> The billable rate accommodation is a reduction in the Receiver's aggregate fees (prior to application of the public service accommodation) to discount for the customary annual increases in her billable rate since October 1, 2017.

<sup>2</sup> The public service accommodation for the Receiver is 20% for all project codes.

<sup>3</sup> The public service accommodation is a ten percent (10%) reduction in Otterbourg's recorded time charges for all project code categories except for the Beechwood Litigation and the Arbitration, for which Otterbourg agreed to a twenty-five percent (25%) reduction, subject to Applicants requesting partial repayment of such reduction later in the case.

**P01 - ASSET ANALYSIS AND RECOVERY**  
**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS**  
**FOR PROJECT CODE P01**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hrs.</b>	<b>Total Compensation<sup>1</sup></b>
Melanie L. Cyganowski ("MLC") Partner	1982	\$1,250.00	30.7	\$38,375.00
Adam C. Silverstein ("ACS") Partner	1992	\$865.00	5.4	\$4,671.00
Philip C. Berg ("PCB") Partner	1992	\$840.00	36.7	\$30,828.00
William M. Moran ("WMM") Partner	1990	\$795.00	1.6	\$1,272.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$805.00	39.2	\$31,556.00
Erik B. Weinick ("EBW") Of Counsel	2002	\$765.00	80.0	\$61,200.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$295.00	.7	\$206.50
	<b>TOTAL</b>		<b>194.3</b>	<b>\$168,108.50</b>

<sup>1</sup> These amounts reflect the recorded fees prior to application of the agreed upon fee accommodations.

**P02 - ASSET DISPOSITION**  
**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS**  
**FOR PROJECT CODE P02**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hrs.</b>	<b>Total Compensation<sup>1</sup></b>
Melanie L. Cyganowski ("MLC") Partner	1982	\$1,250.00	3.1	\$3,875.00
Philip C. Berg ("PCB") Partner	1992	\$840.00	30.4	\$25,536.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$805.00	32.2	\$25,921.00
Erik B. Weinick ("EBW") Of Counsel	2002	\$765.00	26.7	\$20,425.50
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$285.00	.1	\$29.50
	<b>TOTAL</b>		<b>92.5</b>	<b>\$75,787.00</b>

<sup>1</sup> These amounts reflect the recorded fees prior to application of the agreed upon fee accommodations.



**P04 – CASE ADMINISTRATION  
SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS  
FOR PROJECT CODE P04**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hrs.</b>	<b>Total Compensation<sup>1</sup></b>
Melanie L. Cyganowski ("MLC") Partner	1982	\$1,250.00	39.6	\$49,500.00
Adam C. Silverstein ("ACS") Partner	1992	\$865.00	18.0	\$15,570.00
Philip C. Berg ("PCB") Partner	1992	\$865.00	4.0	\$3,360.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$805.00	82.4	\$66,332.00
Erik B. Weinick ("EBW") Of Counsel	2002	\$765.00	51.6	\$39,474.00
Gabriela S. Leon ("GSL") Associate	2019	\$295.00	.8	\$236.00
Christine M. O'Brien ("CMO") Paralegal	N/A	\$295.00	.7	\$206.50
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$295.00	25.3	\$7,463.50
Anthony Williams ("AW") Managing Clerk	N/A	\$295.00	12.8	\$3,776.00
	<b>TOTAL</b>		<b>235.2</b>	<b>\$185,918.00</b>

<sup>1</sup> These amounts reflect the recorded fees prior to application of the agreed upon fee accommodations.

**P05 – CLAIMS ADMINISTRATION & OBJECTIONS  
SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS  
FOR PROJECT CODE P05**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation <sup>1</sup>
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$805.00	1.1	\$885.50
Erik B. Weinick ("EBW") Of Counsel	2002	\$765.00	.9	\$688.50
	<b>TOTAL</b>		<b>2.0</b>	<b>\$1,574.00</b>

---

<sup>1</sup> These amounts reflect the recorded fees prior to application of the agreed upon fee accommodations.

**P10 – FORENSICS**  
**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS**  
**FOR PROJECT CODE P10**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hrs.</b>	<b>Total Compensation<sup>2</sup></b>
Adam C. Silverstein ("ACS") Partner	1992	\$865.00	1.5	\$1,297.50
William M. Moran ("WMM") Partner	1990	\$795.00	5.5	\$4,372.50
Erik B. Weinick ("EBW") Of Counsel	2002	\$765.00	3.8	\$2,907.00
Andrew S. Halpern ("ASH") Associate	1986	\$760.00	2.6	\$1,976.00
Gabriela S. Leon ("GSL") Associate	2019	\$295.00	.6	\$177.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$295.00	2.9	\$855.50
	<b>TOTAL</b>		<b>16.9</b>	<b>\$11,585.50</b>

<sup>2</sup> These amounts reflect the recorded fees prior to application of the agreed upon fee accommodations.

**P14 –BEECHWOOD LITIGATION**  
**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS**  
**FOR PROJECT CODE P14**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hrs.</b>	<b>Total Compensation<sup>3</sup></b>
Melanie L. Cyganowski ("MLC") Partner	1982	\$1,250.00	8.2	\$10,250.00
Adam C. Silverstein ("ACS") Partner	1992	\$865.00	5.3	\$4,584.50
William M. Moran ("WMM") Partner	1990	\$795.00	144.1	\$114,559.50
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$805.00	.4	\$322.00
Erik B. Weinick ("EBW") Of Counsel	2002	\$765.00	214.9	\$164,398.50
Andrew S. Halpern ("ASH") Associate	1986	\$760.00	241.1	\$183,236.00
Gabriela S. Leon ("GSL") Associate	2019	\$295.00	221.7	\$65,401.50
Christine M. O'Brien ("CMO") Paralegal	N/A	\$295.00	21.9	\$6,460.50
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$295.00	113.6	\$33,512.00
Anthony Williams ("AW") Managing Clerk	N/A	\$295.00	10.6	\$3,127.00
	<b>TOTAL</b>		<b>981.8</b>	<b>\$585,851.50</b>

<sup>3</sup> These amounts reflect the recorded fees prior to application of the agreed upon fee accommodations.

**P15 – ARBITRATION  
SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS  
FOR PROJECT CODE P15**

<b>Professional</b>	<b>Year Admitted</b>	<b>Rate Per Hour</b>	<b>No. of Hrs.</b>	<b>Total Compensation<sup>1</sup></b>
Melanie L. Cyganowski ("MLC") Partner	1982	\$1,250.00	3.4	\$4,250.00
Adam C. Silverstein ("ACS") Partner	1992	\$865.00	94.8	\$82,002.00
William M. Moran ("WMM") Partner	1990	\$795.00	1.2	\$954.00
Andrew S. Halpern ("ASH") Associate	1986	\$760.00	252.7	\$192,052.00
Gabriela S. Leon ("GSL") Associate	2019	\$295.00	49.1	\$14,484.50
Christine M. O'Brien ("CMO") Paralegal	N/A	\$295.00	3.6	\$1,062.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$295.00	4.9	\$1,445.50
	<b>TOTAL</b>		<b>409.7</b>	<b>\$296,250.00</b>

<sup>1</sup> These amounts reflect the recorded fees prior to application of the agreed upon fee accommodations.

# **EXHIBIT D**

## Receiver Time Records

OTTERBOURG P.C.  
 230 PARK AVENUE  
 NEW YORK, NY 10169-0075

November 26, 2019  
 BILL NO. 206576

Client/Matter No.: 22126/0901  
 Matter Name: SEC v. PLATINUM MANAGEMENT (NY) LLC,  
 et al  
 Billing Partner: RL STEHL

For Services Rendered Through June 30, 2019:

<u>Phase: P01</u>		<u>Asset Analysis &amp; Recovery</u>	
<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/19 MLC	Analysis of Legal Papers Review of proposed engagement agreement with expert for confidential proceeding	.60	750.00
04/01/19 MLC	Draft/revise Review of suggested revisions to expert retention agreement	.70	875.00
04/01/19 MLC	Analysis of Legal Papers Review and revision to draft interrogatory responses in Lincoln ALS litigation action	.60	750.00
04/02/19 MLC	Draft/revise ALS litigation: Reviewed and revised draft interrogatories' responses	1.20	1,500.00
04/02/19 MLC	Conference call(s) Conference call with EBW and Brent Weisenberg concerning responses to interrogatories (ALS)	.30	375.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 2

November 26, 2019  
BILL NO. 206576

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/02/19	MLC	Analysis of Legal Papers Review of S&W's proposed settlement term sheet	1.30	1,625.00
04/03/19	MLC	Analysis of Legal Papers Lincoln/ALS: review of draft discovery responses	1.30	1,625.00
04/03/19	MLC	Correspondence Correspondence concerning closing of APG	.40	500.00
04/03/19	MLC	Correspondence Correspondence concerning retention of expert in connection with confidential arbitration	.60	750.00
04/05/19	MLC	Analysis of Legal Papers Review of Order in Beechwood case	.50	625.00
04/12/19	MLC	Conference(s) in Office Team meeting regarding status of dispositions and litigation	1.50	1,875.00
04/12/19	MLC	Conference(s) in Office PPVA/Agera litigation: meeting with EBW and Marc Kirschner concerning agreement with PPVA re division of responsibilities for litigation and funding	.40	500.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 3

November 26, 2019  
BILL NO. 206576

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/18/19	MLC	Analysis of Legal Papers Review of litigation pleadings in Beechwood	1.40	1,750.00
04/25/19	MLC	Telephone Call(s) Telcon with Brian Pfeiffer concerning status of Abdala testing	.70	875.00
04/30/19	MLC	Analysis of Legal Papers Review and analysis of memorandum concerning recommendation for resolution of Accutane claim	1.10	1,375.00
04/30/19	MLC	Analysis of Legal Papers Review of confidential Agera legal memorandum prepared by PPVA	1.20	1,500.00
05/01/19	MLC	Analysis of Legal Papers Review of Agera addendum regarding litigation funding	.60	750.00
05/02/19	MLC	Draft/revise Reviewed and revised draft of memo in support of motion for hire of legal experts	.40	500.00
05/07/19	MLC	Conference(s) in Office Conference with JSF and EBW concerning updates regarding Arabella; criminal trial and Agera	.80	1,000.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 4

November 26, 2019  
BILL NO. 206576

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/10/19	MLC	Conference(s) in Office Team meeting to review status of dispositions and litigations	1.80	2,250.00
05/14/19	MLC	Analysis of Legal Papers Reviewed summary of open issues remaining in Arabella/mediation	.70	875.00
05/20/19	MLC	Conference(s) In Office Settlement conference at Otterbourg with Judge Rhodes and Dan Weiner	1.20	1,500.00
05/31/19	MLC	Conference(s) In Office Team meeting to review asset dispositions and litigations	2.00	2,500.00
06/04/19	MLC	Correspondence Accutane - Analysis of correspondence with adversary re: settlement	.20	250.00
06/06/19	MLC	Review Documents Agera - analysis of issues re complaint	.40	500.00
06/14/19	MLC	Conference(s) in Office Attendance at team meeting and post-meeting	2.50	3,125.00
06/17/19	MLC	Examine Documents Arabella - update on issues	.80	1,000.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 5

November 26, 2019  
BILL NO. 206576

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/17/19 MLC	Analysis of Legal Papers Review and analysis of Rule 29 Order	1.10	1,375.00
06/19/19 MLC	Conference(s) in Office Conference with Otterbourg and Goldin in preparation for SEC meeting	1.50	1,875.00
06/20/19 MLC	Correspondence Correspondence with Brent Weisenberg concerning shares held in Decision Diagnostics	.30	375.00
06/21/19 MLC	Conference(s) in Office Decision Diagnostics - conference with B. Weisenberg and EBW re strategy	.40	500.00
06/28/19 MLC	Conference(s) in Office Team meeting to review assets and litigation	1.70	2,125.00
06/28/19 MLC	Prepare for Meeting Prepare for team meeting	.50	625.00
TOTAL PHASE P01		30.70	\$38,375.00

Phase: P02

Asset Disposition

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
--------------------------------	--------------------	--------------	---------------

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 6

November 26, 2019  
BILL NO. 206576

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/12/19 MLC	Correspondence LC Energy: correspondence concerning Indiana bill of sale	.30	375.00
04/24/19 MLC	Telephone Call(s) Telcon with Curt Solsvig concerning preparation for call with counsel for potential bidder of Gold Star Mine	.40	500.00
04/24/19 MLC	Conference call(s) Conference call with Solsvig and Glenn Siegel concerning potential bid for Gold Star Mine	.60	750.00
05/03/19 MLC	Analysis of Legal Papers Review of memo concerning LC Energy	.60	750.00
05/03/19 MLC	Correspondence Correspondence with team concerning LC Energy disposition options	.40	500.00
06/18/19 MLC	Examine Documents Goldin Report - asset status update	.80	1,000.00
TOTAL PHASE P02		3.10	\$3,875.00

Phase: P04

Case Administration

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
--------------------------------	--------------------	--------------	---------------

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 7

November 26, 2019  
BILL NO. 206576

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/19	MLC	Correspondence Correspondence with IDB concerning establishment of new account	.40	500.00
04/03/19	MLC	Correspondence Correspondence with Cooley re various open matters	.20	250.00
04/03/19	MLC	Correspondence Correspondence with EBW and ASH concerning discovery costs and various sharing arrangements	.60	750.00
04/03/19	MLC	Correspondence Review of indictment of Greg Lindberg (Eli Global)	.40	500.00
04/03/19	MLC	Review Financial Documents Review of various financial requests for reimbursement from JDS	.70	875.00
04/03/19	MLC	Correspondence Correspondence with SEC concerning S&W proposed term settlement sheet	.30	375.00
04/04/19	MLC	Examine Documents Examine certain financial documents prepared by Goldin and CFO concerning the receivership	1.30	1,625.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 8

November 26, 2019  
BILL NO. 206576

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/08/19	MLC	Examine Documents Review of certain financial statements prepared by Goldin and CFO Rogers	.80	1,000.00
04/10/19	MLC	Conference call(s) Re S&W mediation: telcon with SEC concerning S&W's recent proposed settlement term sheet	.50	625.00
04/10/19	MLC	Conference(s) in Office Con with ACS concerning retention of experts in litigations and issues raised by draft engagement agreements	1.80	2,250.00
04/11/19	MLC	Correspondence Review of draft agenda for team meeting	.20	250.00
04/12/19	MLC	Conference(s) in Office Meeting with Alois and Trey Rogers concerning financial issues	.40	500.00
04/12/19	MLC	Examine Documents Review of analysis summary of PPVA proof of claim	.90	1,125.00
04/17/19	MLC	Prepare for Meeting Review of case summaries in preparation for meeting with SEC	1.30	1,625.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 9

November 26, 2019  
BILL NO. 206576

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/22/19	MLC	Draft/revise Reviewed and revised final draft of quarterly status report	4.20	5,250.00
04/22/19	MLC	Draft/revise Reviewed and revised draft term sheet with S&W	1.20	1,500.00
04/23/19	MLC	Correspondence Correspondence with SEC concerning S&W draft term sheet	.90	1,125.00
04/24/19	MLC	Correspondence Follow up correspondence with Neal Jacobson concerning S&W settlement and other outstanding matters	.60	750.00
04/25/19	MLC	Conference(s) In Office Meeting with Trey Rogers concerning certain financials, including payment of certain expenses and presentation of checks	1.10	1,375.00
04/26/19	MLC	Conference call(s) CAMP Mediation session with Second Circuit mediator re S&W appeal	2.80	3,500.00
04/29/19	MLC	Correspondence Review of correspondence concerning Judge Cogan's comments at close of criminal trial	.30	375.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 10

November 26, 2019  
BILL NO. 206576

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/30/19	MLC	Correspondence Correspondence concerning Kern County tax issue	.60	750.00
04/30/19	MLC	Examine Documents Review of month end financial analysis prepared by Goldin	.80	1,000.00
04/30/19	MLC	Examine Documents Review of financials prepared by CFO	.30	375.00
05/01/19	MLC	Analysis of Legal Papers Review of potential expert retention agreement	.80	1,000.00
05/01/19	MLC	Draft/revise Reviewed and revised draft of motion for procedure to retain experts	1.30	1,625.00
05/01/19	MLC	Draft/revise Reviewed and revised draft of MLC declaration in support of motion for procedure to retain experts	1.10	1,375.00
05/01/19	MLC	Analysis of Legal Papers Review of expert engagement agreement	.60	750.00
05/02/19	MLC	Draft/revise Reviewed and revised draft of MLC declaration in support of motion for hire of legal experts	.50	625.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 11

November 26, 2019  
BILL NO. 206576

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/02/19	MLC	Analysis of Legal Papers Review of ACS edits to motion for legal experts	.50	625.00
05/09/19	MLC	Telephone Call(s) Telcon with Neal Jacobson concerning S&W proposed settlement	.40	500.00
05/09/19	MLC	Court Appearance - General Conference call with Second Circuit CAMP Mediator and counsel for SEC and S&W	.50	625.00
05/09/19	MLC	Prepare for Court Appearance Prepared for CAMP mediation conference	.90	1,125.00
05/09/19	MLC	Telephone Call(s) Telcon with Will Edwards concerning quarterly status report and related issues	.40	500.00
05/10/19	MLC	Correspondence Correspondence concerning S&W settlement offer	.20	250.00
05/15/19	MLC	Examine Documents Reviewed financial analysis prepared by Goldin	.80	1,000.00
05/31/19	MLC	Telephone Call(s) Call with ACS concerning S&W settlement discussions	.50	625.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 12

November 26, 2019  
BILL NO. 206576

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/14/19	MLC	Conference(s) in Office Meeting with M. Kirshner and W. Edwards to prepare for SEC meeting	.50	625.00
06/17/19	MLC	Telephone Call(s) Telcon with ACS concerning response to S&W settlement demands	.30	375.00
06/17/19	MLC	Prepare for Meeting Prepared for meeting with SEC	1.10	1,375.00
06/17/19	MLC	Analyze Documents S&W - Review S&W status	.20	250.00
06/18/19	MLC	Telephone Call(s) Call with Goldin Team re: review of presentation to SEC	.50	625.00
06/19/19	MLC	Conference out of Office Meeting with SEC	1.50	1,875.00
06/19/19	MLC	Prepare for Meeting Prepared for meeting with SEC by, among other things, reviewing slide presentation	1.30	1,625.00
06/25/19	MLC	Correspondence Correspondence re closing arguments in criminal trial	.60	750.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 13

November 26, 2019  
BILL NO. 206576

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/26/19	MLC	Correspondence Correspondence with court concerning pending matters	.40	500.00
06/26/19	MLC	Review Financial Documents Review of financial report prepared by Goldin	1.30	1,625.00
06/28/19	MLC	Analysis of Legal Papers Review of proposed contract for IT	.40	500.00
06/28/19	MLC	Correspondence Follow up correspondence re status of criminal trial	.40	500.00
TOTAL PHASE P04			39.60	\$49,500.00

Phase: P14

BEECHWOOD LITIGATION

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/02/19	MLC	Analysis of Legal Papers Review of Amended Complaint (Beechwood)	1.30	1,625.00
04/04/19	MLC	Analysis of Legal Papers Beechwood: review of discovery issues concerning Curtis Mallet claim of attorney client privilege	1.30	1,625.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 14

November 26, 2019  
BILL NO. 206576

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/10/19	MLC	Examine Documents Beechwood litigation: follow up re Poteat lawsuit	.60	750.00
04/11/19	MLC	Telephone Call(s) Beechwood: telcon with Jonathan Lupkin (possible counsel to Paul Poteat) re litigation	.30	375.00
04/12/19	MLC	Conference(s) in Office Meeting with Brent Weisenberg and EBW concerning various litigation matters involving Beechwood	.50	625.00
04/29/19	MLC	Analysis of Legal Papers Review of litigation memorandum concerning status of current matters	.60	750.00
05/10/19	MLC	Conference(s) in Office Conference with Brent W and EBW concerning litigation discovery schedule in Beechwood	.20	250.00
05/15/19	MLC	Analysis of Legal Papers Summary review of motions to dismiss Beechwood complaint	1.40	1,750.00
05/16/19	MLC	Analysis of Legal Papers Summary review of various pleadings to dismiss the PPCO complaint	.70	875.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 15

November 26, 2019  
BILL NO. 206576

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/18/19	MLC	Conference(s) in Office Beechwood - conference with litigation team re: status and strategy	.20	250.00
06/21/19	MLC	Examine Documents Decision on PPVA motion to dismiss	.60	750.00
06/22/19	MLC	Examine Documents Motions to dismiss	.50	625.00
TOTAL PHASE P14			8.20	\$10,250.00

Phase: P15

ARBITRATION

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/02/19	MLC	Conference(s) in Office Arbitration: con with ACS re potential experts to assist in litigation and arbitration	1.00	1,250.00
06/25/19	MLC	Correspondence Review of correspondence with Arbitrators in confidential arbitration proceeding re scheduling of motions, etc	.70	875.00
06/25/19	MLC	Analysis of Legal Papers Preliminary review and analysis of motion for summary judgment by adversary	1.70	2,125.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 16

November 26, 2019  
BILL NO. 206576

TOTAL PHASE P15	3.40	\$4,250.00
	TOTAL FOR SERVICES	\$106,250.00

# **EXHIBIT E**

## Otterbourg Time Records

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter No.: 22126/0902  
Matter Name: COUNSEL TO RECEIVER IN SEC v. PLATINUM  
MANAGEMENT  
Billing Partner: RL STEHL

October 17, 2019  
BILL NO. 205506

For Services Rendered Through June 30, 2019:

---

Phase: P01 Asset Analysis & Recovery

---

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/19	JSF	Examine Documents Arabella - Update on Safari Arbitration	.40	322.00
04/01/19	EBW	Telephone Call(s) Lincoln - teleconference with contingency counsel regarding discovery responses.	.80	612.00
04/01/19	EBW	Analysis of Legal Papers Lincoln - analysis of revised discovery responses and correspondence with Receiver regarding same.	.40	306.00
04/02/19	EBW	Analysis of Legal Papers Agera - review of proposed term sheets.	.40	306.00
04/02/19	EBW	Review Documents Agera - review of documents and indictment.	.40	306.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 2

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/02/19	EBW	Telephone Call(s) Lincoln - teleconference with B. Weisenberg and contingency counsel regarding discovery responses and motion to dismiss.	1.00	765.00
04/02/19	EBW	Telephone Call(s) Lincoln - additional teleconference with contingency counsel regarding discovery responses and motion to dismiss.	.30	229.50
04/02/19	EBW	Conference(s) In Office Lincoln - conference with Receiver regarding discovery responses.	.20	153.00
04/02/19	EBW	Preparation of Legal Papers Lincoln - review of discovery responses.	.40	306.00
04/02/19	PCB	Review Documents Agera Litigation - Review and analysis of PPVA Litigation Funding Agreement.	1.40	1,176.00
04/02/19	PCB	Review Documents Agera Litigation - Review and analysis of PPVA Litigation Funding Commitment.	1.00	840.00
04/03/19	EBW	Preparation for Conference Agera - preparation for teleconference with P. Berg and M. Kirschner regarding PPVA agreement.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 3

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/03/19	EBW	Telephone Call(s) Agera - teleconference with P. Berg and M. Kirschner regarding PPVA agreement.	.50	382.50
04/03/19	EBW	Analysis of Legal Papers Agera - attention to case strategy issues.	1.20	918.00
04/03/19	EBW	Correspondence Greehey - review of correspondence with debtor's counsel and correspondence with receivership team regarding same.	.30	229.50
04/03/19	PCB	Prep. for conference call Agera Litigation - Preparation for conference call including review Second Amended Complaint.	.80	672.00
04/03/19	PCB	Conference call(s) Agera Litigation - Conference call with Goldin.	.60	504.00
04/03/19	PCB	Correspondence Agera Litigation - Correspondence with Goldin and co-counsel.	.40	336.00
04/04/19	EBW	Correspondence Lincoln - correspondence with contingency counsel regarding discovery and strategy.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 4

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/04/19	EBW	Telephone Call(s) Lincoln - teleconference with contingency counsel regarding discovery and strategy.	.50	382.50
04/04/19	EBW	Review Documents Greehey - attention to loan recovery issues.	.30	229.50
04/04/19	EBW	Review Documents Agera - attention to PPVA issues.	.20	153.00
04/05/19	EBW	Review Documents Greehey - attention to loan recovery issues.	.20	153.00
04/05/19	EBW	Correspondence Arabella - correspondence with local counsel and debtor's counsel regarding scheduling and status.	.20	153.00
04/08/19	EBW	Analysis of Legal Papers TARS - analysis of order granting motion to dismiss.	.30	229.50
04/08/19	EBW	Review Documents Greehey - review of memo regarding recommendations.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 5

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/09/19	EBW	Correspondence Lincoln - correspondence with contingency counsel and review of proposed filings; as well as produced documents.	.80	612.00
04/09/19	EBW	Telephone Call(s) Lincoln - teleconference with contingency counsel and B. Weisenberg regarding strategy.	.30	229.50
04/09/19	EBW	Review Documents Accutane - analysis of documents produced by insurer.	.40	306.00
04/09/19	EBW	Analysis of Legal Papers Arabella - review of draft closing argument letter to arbitrator.	.30	229.50
04/09/19	PCB	Review Documents Agera Litigation - Review and analysis of draft Addendum to Funding Agreement and underlying Funding Agreement.	.90	756.00
04/09/19	PCB	Revision of Documents Agera Litigation - Initial revision of draft Addendum to Funding Agreement.	.50	420.00
04/09/19	PCB	Correspondence Agera Litigation - Correspondence re: Addendum to Funding Agreement.	.40	336.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 6

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/10/19	EBW	Correspondence Lincoln - correspondence with contingency counsel regarding amended complaint.	.20	153.00
04/10/19	EBW	Review Documents Accutane - analysis of produced documents.	.40	306.00
04/10/19	EBW	Analysis of Legal Papers Agera - attention to issues regarding PPVA agreement.	.30	229.50
04/10/19	EBW	Correspondence Arabella - correspondence with debtor's counsel and local counsel regarding status issues.	.10	76.50
04/10/19	PCB	Revision of Documents Agera Litigation - Completed markup of Addendum to Funding Agreement.	1.30	1,092.00
04/10/19	PCB	Review File Agera Litigation - Review file including underlying litigation funding documents.	.60	504.00
04/10/19	PCB	Correspondence Agera Litigation - Correspondence and review of correspondence.	.50	420.00
04/11/19	JSF	Examine Documents Arabella - Update on M&M Lien Mediation	.30	241.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 7

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/11/19	EBW	Analysis of Legal Papers Agera - review of revisions to funding addendum.	.40	306.00
04/11/19	EBW	Correspondence Arabella - correspondence with debtor's counsel regarding mediation and arbitration.	.20	153.00
04/11/19	PCB	Revision of Documents Agera Litigation - Final revisions to Addendum to Funding Agreement.	.70	588.00
04/11/19	PCB	Correspondence Agera Litigation - Correspondence and review of correspondence.	.30	252.00
04/11/19	PCB	Telephone Call(s) Agera Litigation - Telephone conference with counsel.	.30	252.00
04/12/19	JSF	Examine Documents Prepare for Team Meeting with Receiver and Goldin	.80	644.00
04/12/19	JSF	Telephone Call(s) Team Meeting with Receiver; Otterbourg and Goldin to Review Assets; Administrative Matters and Litigation	1.50	1,207.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 8

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/12/19	EBW	Preparation for Conference Status - preparation for bi-weekly status meeting.	.40	306.00
04/12/19	EBW	Conference(s) In Office Status - attendance at bi-weekly disposition and strategy session with receivership team. (EBW portion)	1.50	1,147.50
04/12/19	EBW	Analysis of Legal Papers Agera - attention to PPVA issues.	.20	153.00
04/12/19	EBW	Review Documents Accutane - review of documents produced by insurer.	.40	306.00
04/12/19	EBW	Preparation of Legal Papers Lincoln - review of draft reply in further support of motion to dismiss and correspondence with contingency counsel regarding same.	1.20	918.00
04/13/19	EBW	Preparation of Legal Papers Lincoln - analysis of revised brief.	.30	229.50
04/15/19	EBW	Telephone Call(s) Lincoln - teleconference with contingency counsel regarding motion to dismiss.	.10	76.50
04/16/19	JSF	Examine Documents TARS and Cleveland Mining Updates	.60	483.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 9

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/16/19	EBW	Correspondence Agera - preparation of correspondence to PPVA regarding items of mutual concern.	.20	153.00
04/16/19	PCB	Revision of Documents Agera Litigation - Further revision of Addendum to Funding Agreement to incorporate Goldin comments.	1.20	1,008.00
04/16/19	PCB	Review File Agera Litigation - Review of precedent.	.40	336.00
04/16/19	PCB	Correspondence Agera Litigation - Correspondence with counsel and Goldin.	.30	252.00
04/17/19	JSF	Examine Documents Arabella - Correspondence re: Schedule for Mediation of Lien Holders' Claims and Preparation for Mediation	.40	322.00
04/19/19	PCB	Revision of Documents Agera Litigation - Further revision of Addendum to Funding Agreement.	1.00	840.00
04/19/19	PCB	Correspondence Agera Litigation - Correspondence and review of correspondence re: Addendum to Funding Agreement.	.50	420.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 10

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/22/19	JSF	Telephone Call(s) Arabella - Call with CRO and Counsel re: Preparation for M&M Lienholder Mediation	.80	644.00
04/22/19	JSF	Examine Documents Arabella - Updated Waterfall	.30	241.50
04/23/19	JSF	Examine Documents Arabella - Review of Issues to Raise by Receiver in M&M Lien Mediation	1.20	966.00
04/26/19	JSF	Conference(s) in Office Team Meeting with Receiver and Goldin to Discuss Assets and Litigation and Subsequent Meeting with Receiver	2.80	2,254.00
04/26/19	JSF	Examine Documents Prepare for Team Meeting with Receiver and Goldin	.50	402.50
04/26/19	EBW	Conference(s) In Office Administrative - attendance at bi-weekly team meeting on dispositions and litigation.	1.50	1,147.50
04/26/19	EBW	Analysis of Legal Papers Greehey - attention to status and strategy of loan recovery.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 11

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/26/19	EBW	Analysis of Legal Papers Accutane - attention to status and strategy of loan recovery.	.20	153.00
04/26/19	PCB	Review File Preparation for weekly team meeting.	.50	420.00
04/26/19	PCB	Conference(s) In Office Weekly team meeting of Receiver; Otterbourg; Goldin and Platinum.	1.80	1,512.00
04/26/19	WMM	Legal services/Legal Papers Analyze Agera memo for PPCO and budget; and communications concerning same.	.80	636.00
04/29/19	JSF	Examine Documents Update on Status of Asset Disposition and Litigation	1.60	1,288.00
04/29/19	EBW	Review Documents Agera - review of memoranda and proposed agreements from PPVA.	.30	229.50
04/29/19	EBW	Conference(s) In Office Accutane - conference with B. Weisenberg regarding strategy.	.20	153.00
04/29/19	EBW	Preparation of Memorandum Accutane - preparation of memorandum regarding strategy.	.40	306.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 12

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/30/19	EBW	Telephone Call(s) Agera - teleconference with PPVA regarding items of mutual interest.	.50	382.50
04/30/19	EBW	Telephone Call(s) Agera - teleconference with M. Kirschner regarding strategy.	.30	229.50
04/30/19	EBW	Telephone Call(s) Accutane - teleconference with B. Weisenberg regarding strategy.	.20	153.00
04/30/19	PCB	Review Documents Agera Litigation - Review and analysis of comments to Addendum to Funding Agreement.	1.00	840.00
04/30/19	PCB	Correspondence Correspondence and review of correspondence.	.60	504.00
04/30/19	WMM	Legal services/Legal Papers Analyzing Agera litigation memo and communications concerning same.	.80	636.00
05/01/19	EBW	Correspondence Agera - correspondence regarding funding agreement and revisions to same.	.80	612.00
05/01/19	EBW	Conference(s) In Office Agera - conference with Receiver regarding funding agreement.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 13

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/19	EBW	Telephone Call(s) Accutane - teleconference with B. Weisenberg regarding strategy.	.30	229.50
05/01/19	EBW	Preparation for Conference Accutane - preparation for teleconference with counsel for insurance company.	.20	153.00
05/01/19	PCB	Review Documents Agera - Review and analysis of draft Agera Addendum to Funding Agreement.	.80	672.00
05/01/19	PCB	Correspondence Agera - Correspondence and review of correspondence.	.50	420.00
05/01/19	PCB	Review/Revision of Documents Agera: - Review and comment on proposed new language for Addendum to Funding Agreement.	.50	420.00
05/02/19	EBW	Telephone Call(s) Agera - teleconference with counsel for PPVA regarding issues of mutual interest.	.10	76.50
05/02/19	EBW	Analysis of Legal Papers Agera - attention to tolling issues.	.20	153.00
05/02/19	EBW	Preparation for Conference Accutane - preparation for call with insurer's counsel.	.90	688.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 14

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/02/19	EBW	Telephone Call(s) Accutane - teleconference with insurer's counsel.	.20	153.00
05/02/19	EBW	Preparation of Legal Papers Agera - preparation of agreement language.	.40	306.00
05/02/19	PCB	Correspondence Agera - Correspondence re: Addendum to Funding Agreement.	.30	252.00
05/02/19	PCB	Review Documents Agera - Review and sign-off on further revised Addendum to Funding Agreement.	.40	336.00
05/06/19	JSF	Examine Documents Arabella - Analysis of Arbitration Decision re: Safari Group	.70	563.50
05/06/19	JSF	Examine Documents Arabella - Equitable Issues re: Proration of Liens in Bankruptcy re: M&M Arbitration	.60	483.00
05/06/19	EBW	Analysis of Legal Papers Arabella - review of arbitrator's decision on scope of settlement agreement.	.30	229.50
05/06/19	EBW	Telephone Call(s) Recoveries - teleconference with B. Weisenberg regarding Accutane; Greehey and Cashcall.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 15

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/07/19	JSF	Examine Documents Arabella - Updated Waterfall Analysis	.40	322.00
05/07/19	JSF	Telephone Call(s) Call with Curt Solsvig re: LC Energy and Arabella	.30	241.50
05/07/19	JSF	Examine Documents Arabella - Open Issues to Close-Out	.30	241.50
05/07/19	JSF	Research Arabella - Equitable Splitting of M&M Lien Obligations Among Non-Operating Owners	.60	483.00
05/07/19	EBW	Analysis of Legal Papers Arabella - review of arbitrator's decision and correspondence with debtor regarding same.	.30	229.50
05/07/19	EBW	Telephone Call(s) Agera - teleconference with counsel for PPVA regarding items of mutual concern.	.10	76.50
05/07/19	EBW	Analysis of Legal Papers Agera - attention to tolling issues.	.60	459.00
05/07/19	JKH	Research Running people search regarding Over Everything loan	.40	118.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 16

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/08/19	JSF	Telephone Call(s) - Creditor Arabella - Calls with Curt Solsvig re: Safari Litigation and APC Additional Proceeds	.30	241.50
05/08/19	JSF	Conference(s) in Office Arabella and LC Energy - Meeting with Receiver to Discuss Options and Next Steps	1.30	1,046.50
05/08/19	JSF	Examine Documents Arabella - Updated Waterfall Analysis	.30	241.50
05/08/19	JSF	Correspondence Arabella - Dan Callahan re: M&M Lien Mediation	.20	161.00
05/08/19	EBW	Telephone Call(s) Accutane - teleconference with counsel for insurer.	.30	229.50
05/08/19	EBW	Preparation for Conference Accutane - preparation with B. Weisenberg for teleconference with counsel for insurer.	.30	229.50
05/08/19	EBW	Correspondence Arabella - correspondence with debtor's team regarding strategy and arbitration outcome.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 17

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/08/19	EBW	Conference(s) In Office Arabella - participation in receivership team meeting on status and strategy. (EBW portion).	.40	306.00
05/09/19	EBW	Correspondence Agera - correspondence with Receiver regarding funding issues.	.30	229.50
05/09/19	EBW	Telephone Call(s) Lincoln - teleconference with contingency counsel and B. Weisenberg regarding status and strategy.	.40	306.00
05/10/19	JSF	Examine Documents Prepare for Meeting to Discuss Admin. Matters; Asset Disposition and Litigation	.60	483.00
05/10/19	JSF	Conference(s) in Office Team Meeting with Receiver and Goldin	1.50	1,207.50
05/10/19	JSF	Correspondence Arabella - Dan Callahan re: Founders Arbitration Decision and Settlement Discussions	.20	161.00
05/10/19	EBW	Conference(s) In Office Dispositions - participation in bi-weekly strategy and status conference. (EBW portion).	1.50	1,147.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 18

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/10/19	EBW	Correspondence Arabella - correspondence with local counsel and attention to recent correspondence from debtor.	.20	153.00
05/10/19	PCB	Prep. for conference call Preparation for team meeting.	.40	336.00
05/10/19	PCB	Conference(s) In Office Receiver; Otterbourg; Goldin and Platinum team update and status meeting.	1.50	1,260.00
05/10/19	ACS	Conference(s) w/ CoCounsel - Other Receiver-Otterbourg-Goldin meeting	1.50	1,297.50
05/13/19	JSF	Examine Documents Arabella - Draft Mediation Statement for M&M Lien Mediation	1.30	1,046.50
05/13/19	JSF	Examine Documents Review of Summary of LC Energy and Arabella Status and Request for Research from SEC	.40	322.00
05/13/19	JSF	Examine Documents Updates on Administrative and Asset Issues	1.10	885.50
05/13/19	EBW	Telephone Call(s) Accutane - preparation for teleconference with counsel for insurer; as well as pre and post-call with B. Weisenberg.	.40	306.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 19

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/13/19	EBW	Correspondence Arabella - preparation of correspondence to SEC.	.40	306.00
05/14/19	EBW	Correspondence Arabella - correspondence with SEC regarding Arabella status.	.20	153.00
05/14/19	EBW	Correspondence Arabella - correspondence with adversary and receivership team regarding substantial contribution motion.	.30	229.50
05/15/19	EBW	Correspondence Arabella - correspondence with C. Solsvig regarding motion for substantial contribution.	.10	76.50
05/16/19	JSF	Examine Documents Arabella - Mineral Lien Analysis for Mediation	.40	322.00
05/16/19	EBW	Analysis of Legal Papers Arabella - attention to mediation issues.	.60	459.00
05/16/19	EBW	Correspondence Accutane - correspondence and teleconference with B. Weisenberg regarding settlement.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 20

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/17/19	JSF	Telephone Call(s) Arabella - Call with Chip and Curt re: M&M Mediation and Substantial Contribution Motion	.50	402.50
05/17/19	JSF	Correspondence Arabella - Dan Callahan re: M&M Lien Analysis and Mediation	.20	161.00
05/17/19	EBW	Telephone Call(s) Arabella - teleconference with J. Feeney; C. Solsvig and Debtor's CRO regarding status and strategy.	.50	382.50
05/17/19	PCB	Review Documents Agera/PGS - Review of PPVA comments to Addendum to Funding Agreement.	.80	672.00
05/17/19	PCB	Correspondence Agera/PGS - Correspondence re: Addendum to Funding Agreement.	.40	336.00
05/20/19	EBW	Correspondence Agera - correspondence with receivership team regarding Agera funding agreement.	.20	153.00
05/20/19	EBW	Correspondence Arabella - correspondence with case counsel regarding hearing on substantial contribution motion.	.10	76.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 21

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/20/19	EBW	Analysis of Legal Papers Accutane - analysis of settlement issues.	.10	76.50
05/20/19	PCB	Research Agera/PGS - Research re: PGS; Beechwood and LL Finance.	.50	420.00
05/20/19	PCB	Correspondence Agera/PGS - Correspondence re: Addendum to Funding Agreement.	.40	336.00
05/21/19	JSF	Examine Documents Arabella - Adversaries Mediation Statements in M&M Lien Actions	.60	483.00
05/21/19	EBW	Telephone Call(s) Golden Gate - teleconference with T. Rogers and B. Parlin regarding background information.	.70	535.50
05/21/19	EBW	Correspondence Greehey - correspondence and teleconference with B. Weisenberg regarding loan recovery strategy.	.30	229.50
05/21/19	EBW	Analysis of Legal Papers Agera - review of agreements with PPVA and correspondence with receivership team and PPVA regarding same.	.90	688.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 22

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/21/19	PCB	Review/Revision of Documents Agera/PGS - Review and comment on Letter Agreement.	1.10	924.00
05/21/19	PCB	Revision of Documents Agera/PGS - Further revision of Addendum to Funding Agreement.	.50	420.00
05/21/19	PCB	Correspondence Agera/PGS - Correspondence and review of correspondence.	.60	504.00
05/22/19	JSF	Examine Documents Update Receiver on Arabella and LC Energy Assets	.30	241.50
05/22/19	JSF	Examine Documents Arabella - Order Scheduling Hearing on Substantial Contribution Motion	.20	161.00
05/22/19	EBW	Correspondence Agera - correspondence with receiver and SEC regarding status.	.10	76.50
05/23/19	EBW	Telephone Call(s) Arabella - teleconference with debtor's professionals regarding mediation.	.60	459.00
05/23/19	EBW	Correspondence Arabella - correspondence with debtor's professionals regarding mediation.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 23

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/23/19	EBW	Preparation for Court Arabella - preparation for substantial contribution motion hearing.	2.10	1,606.50
05/23/19	EBW	Analysis of Legal Papers Lincoln - review of trust's pleadings.	.80	612.00
05/23/19	EBW	Telephone Call(s) Agera - teleconference with SEC regarding Agera proposal.	.30	229.50
05/23/19	EBW	Correspondence Agera - correspondence with PPVA's counsel regarding items of mutual interest.	.20	153.00
05/24/19	JSF	Telephone Call(s) LC Energy - Conference Call with Curt Solvig; David Hatchett and Debbie Caruso re: Closing Down the Mine	.90	724.50
05/24/19	JSF	Examine Documents LC Energy - Memos from David Hatchett re: Statutory and Contractual Liabilities	.70	563.50
05/24/19	EBW	Analysis of Legal Papers Agera - analysis of draft complaint.	.80	612.00
05/24/19	EBW	Correspondence Accutane - analysis of correspondence from insurer's counsel.	.40	306.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 24

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/28/19	EBW	Telephone Call(s) Recoveries - teleconferences with B. Weisenberg regarding Accutane; Beechwood; forensics and Lincoln.	.80	612.00
05/28/19	EBW	Telephone Call(s) Accutane - teleconference with counsel for insurer regarding claims.	.30	229.50
05/28/19	EBW	Correspondence Accutane - correspondence with Receiver regarding status.	.20	153.00
05/28/19	EBW	Correspondence Arabella - correspondence with parties regarding mineral lien mediation.	.20	153.00
05/28/19	EBW	Analysis of Legal Papers Arabella - analysis of issues regarding motion for substantial contribution.	.80	612.00
05/28/19	EBW	Analysis of Legal Papers LC - analysis of draft bill of sale regarding railroad issues.	.20	153.00
05/28/19	EBW	Telephone Call(s) Lincoln - update call with contingency counsel.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 25

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/29/19	JSF	Examine Documents Arabella - Notice of Dispute from APC Trustee	.40	322.00
05/29/19	EBW	Telephone Call(s) Agera - teleconference with SEC regarding status and correspondence with receiver following call.	.30	229.50
05/29/19	EBW	Analysis of Legal Papers Agera - review of draft complaint from PPVA	2.60	1,989.00
05/29/19	PCB	Correspondence Agera/PGS - Correspondence and review of correspondence.	.40	336.00
05/30/19	EBW	Correspondence Accutane - correspondence and teleconference with B. Weisenberg regarding settlement.	.30	229.50
05/30/19	EBW	Correspondence Agera - correspondence with PPVA regarding agreement.	.40	306.00
05/30/19	EBW	Correspondence Arabella - correspondence with local counsel and others regarding mediation.	.20	153.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 26

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/30/19	EBW	Review Documents Lincoln - attention to document production issues.	.30	229.50
05/30/19	PCB	Review Documents Agera/PGS - Review Collas Crill initial comments to PGS Addendum and Letter Agreement.	.70	588.00
05/30/19	PCB	Telephone Call(s) Agera/PGS - Teleconference with Rupert Stanning at Collas Crill re: comments on documents.	.50	420.00
05/30/19	PCB	Correspondence Agera/PGS - Correspondence and review of correspondence.	.40	336.00
05/30/19	PCB	Research Agera/PGS - Research re: legal entities.	.50	420.00
05/31/19	JSF	Conference(s) in Office Attend Team Meeting with Goldin and Receiver re: Assets and Investigation	1.60	1,288.00
05/31/19	JSF	Correspondence Arabella - Correspondence re: Status of M&M Lien Mediation in TX	.20	161.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 27

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/31/19	JSF	Telephone Call(s) Arabella - Curt Solsvig re: Preparation for M&M Lien Mediation in TX	.20	161.00
05/31/19	EBW	Review Documents Lincoln - attention to vendor agreement and production issues.	.30	229.50
05/31/19	EBW	Correspondence Agera - correspondence regarding funding agreement.	.30	229.50
05/31/19	EBW	Correspondence Arabella - correspondence and teleconference with C. Solsvig and co-counsel regarding lien mediation.	.60	459.00
05/31/19	EBW	Conference(s) In Office Dispositions/Litigation - participation in bi-weekly receivership team status and strategy conference. (EBW portion).	1.80	1,377.00
05/31/19	EBW	Preparation for Conference Dispositions/Litigation - preparation for bi-weekly receivership team status and strategy conference.	.20	153.00
05/31/19	EBW	Analysis of Legal Papers Agera - review of draft complaint.	.40	306.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 28

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/31/19	PCB	Conference(s) In Office Regular Receiver; Otterbourg; Goldin and Platinum team status and update meeting (PCB Portion)	.80	672.00
05/31/19	PCB	Review/Revision of Documents Agera/PGS - Review and comment on draft PGS Addendum from Collas Crill.	.80	672.00
05/31/19	PCB	Review/Revision of Documents Agera/PGS - Review and comment on draft Letter Agreement from Collas Crill.	.60	504.00
05/31/19	PCB	Correspondence Agera/PGS - Correspondence; review of correspondence and filing re: execution versions of PGS Addendum and Letter Agreement.	1.00	840.00
05/31/19	ACS	Conference(s) w/ CoCounsel - Other Receiver-Otterbourg-Goldin meeting (ACS time)	1.10	951.50
05/31/19	ACS	Analysis of Correspondence Continued review and comment on Agera complaint and e-mail to EBW; et al	.80	692.00
06/01/19	EBW	Correspondence Arabella - correspondence with C. Solsvig regarding results of mediation and analysis of same.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 29

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/03/19	JSF	Examine Documents Arabella - Revised Waterfall Post-M&M Settlement	.30	241.50
06/03/19	EBW	Correspondence Agera - correspondence with counsel for PGS regarding complaint.	.80	612.00
06/03/19	EBW	Correspondence Agera - correspondence with PGS and funder regarding agreements.	.20	153.00
06/03/19	EBW	Analysis of Legal Papers Agera - review of revised complaint.	2.40	1,836.00
06/03/19	EBW	Telephone Call(s) Lincoln - teleconference with contingency counsel regarding status report.	.80	612.00
06/03/19	PCB	Review/Revision of Documents Agera - Review and finalizing of PGS Addendum to Funding Agreement for signature.	.70	588.00
06/03/19	PCB	Correspondence Agera - Correspondence and review of correspondence re: PGS Addendum to Funding Agreement.	.60	504.00
06/03/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon counsel to BDO	.50	432.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 30

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/04/19	EBW	Correspondence Agera - correspondence and teleconference with counsel for PPVA regarding complaint.	.60	459.00
06/04/19	EBW	Correspondence Agera - correspondence with counsel for PPVA and funder regarding agreements.	.30	229.50
06/04/19	EBW	Preparation for Court Lincoln - preparation for status conference.	.30	229.50
06/04/19	EBW	Correspondence Accutane - correspondence with adversary and receiver regarding settlement.	.20	153.00
06/04/19	EBW	Analysis of Legal Papers Agera - review of draft complaint.	1.90	1,453.50
06/05/19	EBW	Preparation for Court Lincoln - preparation for status conference.	.40	306.00
06/05/19	EBW	Attend Court Lincoln - attendance at status conference; including post conference meetings with counsel.	3.00	2,295.00
06/05/19	EBW	Correspondence Agera - correspondence and teleconferences with PGS counsel regarding complaint.	1.20	918.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 31

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/05/19	EBW	Preparation of Legal Papers Agera - revisions to complaint.	1.80	1,377.00
06/05/19	PCB	Correspondence Agera - Correspondence and review of correspondence and of executed signature pages re: PGS Addendum.	.50	420.00
06/06/19	EBW	Telephone Call(s) Agera - teleconferences with B. Weisenberg and M. Kirschner regarding complaint.	.40	306.00
06/06/19	EBW	Preparation of Legal Papers Agera - attention to issues regarding complaint; including correspondence and teleconferences with Receiver; and analysis of applicable law.	4.20	3,213.00
06/06/19	EBW	Analysis of Legal Papers Agera - multiple teleconferences and correspondence with counsel for PGS regarding complaint.	.80	612.00
06/06/19	EBW	Review Documents Lincoln - attention to discovery issues.	.20	153.00
06/07/19	EBW	Correspondence Agera - correspondence with counsel for PGS regarding complaint and attention to issues relating thereto.	2.40	1,836.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 32

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/12/19	JSF	Examine Documents Review of Status of Remaining Assets	1.80	1,449.00
06/13/19	JSF	Examine Documents Status of Asset Review and Litigations	2.30	1,851.50
06/13/19	EBW	Telephone Call(s) ALS - teleconference with counsel for minority members.	.30	229.50
06/13/19	EBW	Preparation for Conference Administrative - preparation for bi-weekly team meeting.	.40	306.00
06/14/19	JSF	Conference(s) in Office Team Meeting with Goldin and Receiver	1.50	1,207.50
06/14/19	JSF	Examine Documents Prepare for Team Meeting with Receiver and Goldin	.40	322.00
06/14/19	PCB	Conference(s) In Office Weekly Receiver; Otterbourg; Goldin and Platinum review and update meeting.	1.50	1,260.00
06/17/19	JSF	Telephone Call(s) Arabella - Call with Curt Solsvig; Chip Hoebeke and David Hall re: Final Steps to Close Case and Substantial Contribution Motion	.50	402.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 33

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/17/19	JSF	Examine Documents Arabella - Strategic Options re: Substantial Contribution Motion and Claims of Professionals	.40	322.00
06/17/19	EBW	Telephone Call(s) Agera - teleconference with W. Gluck regarding common-interest issues.	.50	382.50
06/17/19	EBW	Telephone Call(s) Arabella - teleconference with J. Feeney; C. Solsvig and debtor's professionals regarding status and strategy.	.50	382.50
06/17/19	EBW	Analysis of Legal Papers Arabella - attention to issues regarding substantive contribution motion.	.60	459.00
06/18/19	EBW	Preparation of Legal Papers Arabella - preparation of deposition notices and document requests.	.40	306.00
06/18/19	EBW	Telephone Call(s) Lincoln - teleconference with contingency counsel regarding document production.	.60	459.00
06/20/19	EBW	Correspondence Arabella - correspondence with co-counsel regarding substantial contribution motion discovery.	.40	306.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 34

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/21/19	JSF	Examine Documents Asset Analysis - Review of Open Issues and Active Assets	1.80	1,449.00
06/21/19	JSF	Examine Documents Arabella - Subpoenas to Liquidators and CRO re: Substantial Contribution Motion	.30	241.50
06/21/19	EBW	Correspondence Arabella - correspondence with co-counsel regarding substantial contribution motion discovery requests.	.60	459.00
06/25/19	EBW	Correspondence Arabella - correspondence with local counsel and attention to hearing issues.	.40	306.00
06/25/19	EBW	Correspondence Agera - analysis of legal issues.	.80	612.00
06/26/19	JSF	Examine Documents Arabella - Deposition Notices	.30	241.50
06/26/19	EBW	Analysis of Legal Papers Agera - analysis of participation issues.	.40	306.00
06/27/19	EBW	Legal Research Agera - preparation for teleconference with counsel for PGS regarding status and strategy.	.60	459.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 35

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/28/19	JSF	Conference(s) in Office Team Meeting with Receiver to Review Assets and Litigation	1.70	1,368.50
06/28/19	JSF	Examine Documents Prepare for Team Meeting to Discuss Assets and Litigation Updates	.40	322.00
06/28/19	EBW	Preparation for Conference Agera - preparation for teleconference with PGS/PPVA counsel regarding status and strategy.	.40	306.00
06/28/19	EBW	Telephone Call(s) Agera - teleconference with PGS/PPVA counsel regarding status and strategy.	.50	382.50
06/28/19	EBW	Correspondence Arabella - review of discovery requests and correspondence with local counsel regarding same.	.80	612.00
06/28/19	PCB	Prep. for conference call Preparation for bi-weekly team meeting; review of file.	.60	504.00
06/28/19	PCB	Conference(s) In Office Bi-weekly Receiver; Otterbourg; Goldin and Platinum team meeting.	1.40	1,176.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 36

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/28/19	ACS	Conference(s) w/ CoCounsel - Other Goldin-Otterbourg meeting	1.50	1,297.50
06/29/19	JKH	Analyze Documents Arabella - Reviewing Notice of Deposition and letter from counsel and calendaring all deadlines	.30	88.50
TOTAL PHASE P01			163.60	\$129,733.50

Phase: P02

Asset Disposition

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/19	JSF	Examine Documents Asset Portfolio Status	.80	644.00
04/01/19	EBW	Telephone Call(s) Dispositions - teleconference with C. Solsvig regarding status and strategy of Arabella; LC Energy; Greehey and Decision Diagnostics.	.40	306.00
04/01/19	EBW	Telephone Call(s) Dispositions - status teleconference regarding various dispositions and asset recoveries with B. Weisenberg and T. Rogers; including Accutane; Claims process; Bahamas; LC Energy and Lincoln.	.60	459.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 37

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/19	PCB	Correspondence Daybreak - Correspondence with buyer's counsel re: release documentation.	.40	336.00
04/02/19	EBW	Review Documents Dispositions - review of outstanding disposition issues.	.60	459.00
04/03/19	EBW	Telephone Call(s) Securities - teleconference with T. Rogers regarding disposition issues.	.20	153.00
04/04/19	EBW	Correspondence Abdala - correspondence with receivership team regarding post-closing matters.	.10	76.50
04/04/19	EBW	Review Documents LC - attention to disposition status issues.	.20	153.00
04/04/19	PCB	Correspondence Abdala - Correspondence and review of correspondence re: JDS deposit.	.40	336.00
04/05/19	JSF	Examine Documents LC Energy - Issues Concerning Liability	.20	161.00
04/09/19	EBW	Correspondence LC - correspondence with receivership team regarding status.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 38

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/10/19	JSF	Conference(s) in Office Meet with C. Solsvig; B. Weisenberg; T. Rogers and EBW re: Update on Open Transactions	1.40	1,127.00
04/10/19	JSF	Examine Documents Review of Status of Open Transactions for Next Report	1.40	1,127.00
04/10/19	EBW	Conference(s) In Office Dispositions - conference with J. Feeney; B. Weisenberg; C. Solsvig and T. Rogers regarding LC; Cokal; NJE; TARS; Greehey and additional.	1.40	1,071.00
04/10/19	EBW	Analysis of Legal Papers Abdala - attention to post-closing issues.	.20	153.00
04/10/19	PCB	Review/Revision of Documents Abdala - Review and comment on JDS letter.	.50	420.00
04/10/19	PCB	Correspondence Abdala - Correspondence re: JDS.	.30	252.00
04/11/19	JSF	Examine Documents Cokal Royalty Update	.20	161.00
04/11/19	PCB	Review/Revision of Documents Cokal - Review and comment on Confidentiality Deed.	.90	756.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 39

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/11/19	PCB	Correspondence Cokal - Correspondence re: Confidentiality Deed.	.30	252.00
04/12/19	JSF	Examine Documents Asset Review Summary	1.70	1,368.50
04/12/19	EBW	Correspondence Cokal - correspondence with receivership team regarding sale issues.	.10	76.50
04/12/19	JKH	Review Documents Beta Sale - reviewing and responding regarding retrieval of formation documations	.10	29.50
04/15/19	JSF	Examine Documents Prior Goldin Reports on Asset Disposition Status	2.30	1,851.50
04/15/19	PCB	Review File Abdala/Daybreak/Desert Hawk/PEDEVCO - Review of file and assembly of closing documents from several deals for auditor.	.80	672.00
04/15/19	PCB	Correspondence Abdala/Daybreak/Desert Hawk/PEDEVCO - Correspondence re: closing documents.	.70	588.00
04/16/19	JSF	Examine Documents Asset Status - Accutane and Cokal	.30	241.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 40

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/18/19	JSF	Examine Documents Cokal - Update on Discussions re: Sale of Royalty	.20	161.00
04/23/19	JSF	Examine Documents LC Energy - Status of Bidding and Sale Process	.60	483.00
04/24/19	JSF	Research LC Energy re: Liabilities After Abandonment of Property	.40	322.00
04/25/19	JSF	Telephone Call(s) Call with Houlihan Lokey re: LC Energy Bids and Options	.40	322.00
04/25/19	JSF	Telephone Call(s) LC Energy - Call with Curt Solsvig and Indiana Environmental Counsel re: Procedures for Abandoning Mine and Liabilities	1.50	1,207.50
04/25/19	JSF	Examine Documents Cokal - Revisions to Retention Agreement with Australian Counsel re: Cokal Sale of Royalty and NDA Review	.20	161.00
04/25/19	JSF	Examine Documents LC Energy - Motion and Procedures for Sale	.30	241.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 41

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/25/19	EBW	Telephone Call(s) LC - teleconference with receivership team and Houlihan regarding status.	.40	306.00
04/25/19	EBW	Telephone Call(s) Abdala - teleconference with receiver and buyer's counsel regarding post-closing issues.	.20	153.00
04/25/19	PCB	Prep. for conference call LC Energy - Preparation for update call.	.40	336.00
04/25/19	PCB	Conference call(s) LC Energy - Update conference call with Houlihan Lokey.	.50	420.00
04/26/19	JSF	Examine Documents LC Energy - Updates on Discussions with HL and Indiana Environmental Counsel and Consider Options	.30	241.50
04/29/19	JSF	Telephone Call(s) LC Energy - Call with Curt Solsvig re: Bond Transfer Issue	.60	483.00
04/29/19	JSF	Examine Documents LC Energy - Operating Agreement with Quest	.80	644.00
04/30/19	JSF	Examine Documents Cokal - Status of Marketing of Royalty	.20	161.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 42

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/30/19	PCB	Review Documents Cokal - Review and sign-off on final revision of Confidentiality Deed.	.60	504.00
04/30/19	PCB	Correspondence Cokal - Correspondence re: Confidentiality Deed.	.30	252.00
05/02/19	JSF	Telephone Call(s) LC Energy - Curt Solsvig re: Status of Bids and Next Steps	.20	161.00
05/02/19	JSF	Examine Documents LC Energy - Analysis of Current State of Bidding and Possible Options	.70	563.50
05/02/19	JSF	Examine Documents LC Energy - Operating Agreement re: Wind Down	.90	724.50
05/02/19	JSF	Examine Documents Review of Property List and Remaining Assets for Possible Liquidation or No Value Assessment	1.80	1,449.00
05/03/19	JSF	Telephone Call(s) LC Energy - Conference Call with David Hatchett (IN Counsel) and Curt Solsvig	.90	724.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 43

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/03/19	JSF	Telephone Call(s) LC Energy - Conference Call with Curt Solsvig re: Next Steps	.20	161.00
05/03/19	JSF	Conference(s) in Office LC Energy - Update to Receiver	.30	241.50
05/03/19	JSF	Examine Documents LC Energy - Analysis of Disposition and Wind Down Options	.60	483.00
05/03/19	JSF	Examine Documents LC Energy - Mining and Management Agreement	.70	563.50
05/03/19	EBW	Review Documents Dispositions - review of pending disposition and recovery issues.	.70	535.50
05/03/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence.	.40	336.00
05/06/19	JSF	Examine Documents Updated Asset Disposition Review from Goldin	1.60	1,288.00
05/06/19	JSF	Examine Documents LC Energy - Open Issues	.60	483.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 44

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/06/19	JSF	Examine Documents LC Energy - Releases re: IRR Leases	.20	161.00
05/08/19	JSF	Examine Documents LC Energy Permittee's Management Agreement	.40	322.00
05/08/19	EBW	Conference(s) In Office LC Energy - participation in receivership team meeting on status and strategy. (EBW portion).	1.10	841.50
05/08/19	EBW	Telephone Call(s) Dispositions - teleconference with C. Solsvig and PPVA counsel regarding Over Everything.	.60	459.00
05/08/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence.	.30	252.00
05/08/19	PCB	Conference(s) In Office LC Energy - Internal update meeting re: disposition of LC Energy.	1.10	924.00
05/09/19	EBW	Telephone Call(s) LC Energy - teleconferences with B. Weisenberg and local counsel regarding status.	.60	459.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 45

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/09/19	EBW	Correspondence LC Energy - correspondence with B. Weisenberg and local counsel regarding status.	.20	153.00
05/09/19	EBW	Telephone Call(s) LC Energy - teleconferences with C. Solsvig and operator regarding next steps.	.60	459.00
05/09/19	EBW	Preparation for Conference Dispositions - preparation for bi-weekly disposition and strategy team meeting.	.20	153.00
05/09/19	PCB	Review Documents Genesis Resources Ltd. - Review and analysis of draft Sale of Shares Agreement.	.70	588.00
05/09/19	PCB	Revision of Documents Genesis Resources Ltd. - Revision of Sale of Shares Agreement.	.50	420.00
05/09/19	PCB	Correspondence Genesis Resources Ltd. - Correspondence and review of correspondence.	.30	252.00
05/10/19	EBW	Telephone Call(s) Dispositions - teleconference with N. Jacobson regarding LC Energy and Arabella.	.10	76.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 46

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/10/19	PCB	Correspondence NJ Ethanol - Correspondence and review of correspondence and documents.	.60	504.00
05/13/19	EBW	Correspondence LC - preparation of correspondence to SEC.	.40	306.00
05/14/19	EBW	Correspondence LC - correspondence with SEC regarding LC Energy status.	.20	153.00
05/15/19	PCB	Review File Decision Diagnostics - Review and analysis of file and shareholder disclosures.	1.20	1,008.00
05/15/19	PCB	Correspondence Decision Diagnostics - Correspondence and review of correspondence.	.20	168.00
05/15/19	PCB	Review Documents NJ Ethanol - Review and sign-off on draft Securities Purchase Agreement.	.90	756.00
05/15/19	PCB	Correspondence NJ Ethanol - Correspondence and review of correspondence.	.30	252.00
05/16/19	PCB	Correspondence NJ Ethanol - Correspondence and review of correspondence.	.30	252.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 47

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/17/19	EBW	Telephone Call(s) LC - teleconference with C. Solsvig and J. Feeney regarding FOIA request.	.20	153.00
05/17/19	PCB	Due Diligence Research Decision Diagnostics - Research re: Decision Diagnostics business and filings.	1.00	840.00
05/17/19	PCB	Review Documents Decision Diagnostics - Review demand letter precedent.	.40	336.00
05/17/19	PCB	Preparation of Documents Decision Diagnostics - Initial drafting of demand letter.	1.80	1,512.00
05/17/19	PCB	Correspondence Decision Diagnostics - Correspondence re: demand letter.	.50	420.00
05/20/19	JSF	Examine Documents LC Energy - Update from Houlihan Lokey	.20	161.00
05/20/19	EBW	Correspondence LC - correspondence with Receivership team regarding status.	.20	153.00
05/20/19	PCB	Review/Revision of Documents Agera/PGS - Review and revision of PPVA draft of Addendum to Funding Agreement.	1.00	840.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 48

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/20/19	PCB	Review/Revision of Documents Decision Diagnostics - Review and comment on revised demand letter.	.70	588.00
05/20/19	PCB	Correspondence Decision Diagnostics - Correspondence.	.10	84.00
05/20/19	PCB	Review Documents LC Energy - Review and analysis of Sunrise Coal bid letter.	.40	336.00
05/21/19	PCB	Correspondence NJ Ethanol - Correspondence and review of correspondence.	.40	336.00
05/22/19	EBW	Correspondence Pro Player - correspondence with receivership team regarding assignment.	.10	76.50
05/22/19	EBW	Telephone Call(s) LC - teleconference with Goldin regarding status and strategy regarding sale.	.20	153.00
05/22/19	PCB	Review/Revision of Documents Decision Diagnostics - Review and comment on proposed final demand letter.	.70	588.00
05/22/19	PCB	Correspondence Decision Diagnostics - Correspondence including transmittal of revised drafts.	.40	336.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 49

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/23/19	EBW	Correspondence LC - correspondence with receivership team regarding status and strategy and review of environmental counsel's memos.	1.20	918.00
05/23/19	PCB	Telephone Call(s) LC Energy - Telephone call with Houlihan Lokey.	.20	168.00
05/23/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence.	.30	252.00
05/24/19	EBW	Telephone Call(s) LC - teleconference with J. Feeney; C. Solsvig and Indiana counsel regarding strategy.	.90	688.50
05/24/19	EBW	Correspondence LC - continued review of environmental counsel's memos.	.80	612.00
05/24/19	EBW	Analysis of Legal Papers Pro Player - attention to assignment issues.	.30	229.50
05/28/19	EBW	Analysis of Legal Papers Abdala - attention to post-closing issues.	.10	76.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 50

October 17, 2019  
BILL NO. 205506

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/28/19 PCB	Correspondence Abdala - Correspondence and review of correspondence re: resource validation deadline.	.40	336.00
05/28/19 PCB	Correspondence LC Energy - Correspondence and review of correspondence.	.30	252.00
05/29/19 PCB	Correspondence Abdala - Correspondence re: resource validation.	.30	252.00
05/30/19 EBW	Telephone Call(s) LC - teleconference with C. Solsvig regarding termination letter.	.10	76.50
05/30/19 EBW	Preparation for Conference Dispositions - preparation for bi-weekly disposition conference.	.30	229.50
06/02/19 JSF	Examine Documents LC Energy - Permittee Agreement with ERC	.30	241.50
06/02/19 EBW	Correspondence LC Energy - preparation of ERC termination letter.	.70	535.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 51

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/03/19	JSF	Telephone Call(s) LC Energy - Call with Curt Solsvig and Gregg Jenson (ERC - Mine Operator) re: Shutting Down Mine	.50	402.50
06/03/19	JSF	Telephone Call(s) LC Energy - Call with Curt Solsvig re: Follow-Up From Call with ERC	.20	161.00
06/03/19	JSF	Examine Documents LC Energy - ERC Contract and Notice of Termination	.30	241.50
06/03/19	EBW	Telephone Call(s) LC - pre-and post calls with receivership team regarding management contract.	.20	153.00
06/03/19	EBW	Telephone Call(s) LC - teleconference with mine manager.	.50	382.50
06/04/19	JSF	Examine Documents LC Energy - ERC Termination	.20	161.00
06/04/19	EBW	Correspondence LC - revisions to termination letter.	.30	229.50
06/04/19	PCB	Correspondence Agera - Correspondence and review of correspondence re: full execution of addendum.	.50	420.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 52

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/04/19	PCB	Telephone Call(s) LC Energy - Teleconference with Houlihan Lokey.	.60	504.00
06/05/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence.	.40	336.00
06/06/19	PCB	Correspondence Agera - Correspondence re: fully-executed PGS Addendum.	.30	252.00
06/06/19	PCB	Correspondence Abdala - Correspondence and review of correspondence re: resource validation.	.50	420.00
06/07/19	PCB	Correspondence Abdala - Correspondence and review of correspondence.	.40	336.00
06/11/19	PCB	Correspondence Abdala - Correspondence with Chediak.	.30	252.00
06/12/19	EBW	Correspondence LC - correspondence and teleconference with C. Solsvig regarding termination issues.	.30	229.50
06/14/19	EBW	Preparation for Conference Dispositions - preparation for bi-weekly team meeting.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 53

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/14/19	EBW	Conference(s) In Office Dispositions - attendance at bi-weekly team meeting and post-meeting with Receiver. (EBW portion).	2.50	1,912.50
06/14/19	PCB	Correspondence Decision Diagnostics - Correspondence and review of correspondence.	.40	336.00
06/14/19	PCB	Correspondence LC Energy - Correspondence.	.20	168.00
06/17/19	EBW	Conference(s) In Office Conference with B. Weisenberg and T. Rogers regarding Beechwood; forensics; administrative; dispositions and litigation.	1.00	765.00
06/17/19	EBW	Correspondence LC - correspondence with team regarding abandonment issues.	.20	153.00
06/17/19	PCB	Review File Decision Diagnostics - Review file.	.50	420.00
06/17/19	PCB	Correspondence Decision Diagnostics - Correspondence re: demand letter.	.30	252.00
06/18/19	JSF	Telephone Call(s) LC Energy - Call with Houlihan re: Status	.20	161.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 54

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/18/19	JSF	Telephone Call(s) LC Energy - Call with Curt Solsvig and David Hatchett re: Preparation for Call with ERC	.60	483.00
06/18/19	JSF	Examine Documents LC Energy - Permittee Agreement with ERC	.30	241.50
06/18/19	JSF	Examine Documents LC Energy - Overview of Discussion Points for Conference Call with ERC	.50	402.50
06/18/19	PCB	Prep. for conference call LC Energy - Review file in preparation for conference call.	.70	588.00
06/18/19	PCB	Conference call(s) LC Energy - Conference call with Houlihan Lokey.	.60	504.00
06/18/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence in follow-up to call.	.60	504.00
06/18/19	PCB	Correspondence Decision Diagnostics - Correspondence re: next steps.	.50	420.00
06/19/19	JSF	Examine Documents LC Energy - Prepare for Call with ERC	.30	241.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 55

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/19/19	EBW	Correspondence LC - correspondence with receivership team regarding abandonment.	.20	153.00
06/20/19	JSF	Telephone Call(s) LC Energy - Call with Curt Solsvig; David Hatchett and Greg Jennings re: Abandonment of Mine	.70	563.50
06/20/19	JSF	Examine Documents LC Energy - Prepare for Call with ERC Representative (Review of Outline	.40	322.00
06/20/19	EBW	Telephone Call(s) LC - teleconference with J. Feeney; C. Solvig; environmental counsel and ERC.	.70	535.50
06/20/19	EBW	Analysis of Legal Papers LC - attention to abandonment issues.	.60	459.00
06/20/19	PCB	Correspondence LC Energy - Follow-up correspondence re: abandonment.	.30	252.00
06/21/19	JSF	Examine Documents LC Energy - Operating Agreement Indemnification Provisions	.40	322.00
06/21/19	EBW	Telephone Call(s) LC - teleconference with B. Weisenberg and local counsel.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 56

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/21/19	EBW	Conference(s) In Office Decision Diagnostics - conference with B. Weisenberg and Receiver regarding strategy.	.40	306.00
06/24/19	JSF	Examine Documents Goldin Asset Review Summary	1.70	1,368.50
06/24/19	EBW	Telephone Call(s) LC - teleconference with B. Weisenberg regarding abandonment issues.	.30	229.50
06/25/19	JSF	Examine Documents LC Energy - Update from Curt Solsvig	.20	161.00
06/25/19	EBW	Analysis of Legal Papers LC - attention to abandonment issues.	.60	459.00
06/26/19	PCB	Correspondence Decision Diagnostics - Correspondence re: next steps.	.40	336.00
06/26/19	PCB	Review File Decision Diagnostics - Review file and demand letter.	.60	504.00
06/27/19	JSF	Telephone Call(s) LC Energy - Call with Greg Jensen; David Hatchett; Curt Solsvig and Brent Weisenberg re: Abandonment and Remediation	.40	322.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 57

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/27/19	JSF	Examine Documents LC Energy - Issues for Remediation and Abandonment of Mine	.30	241.50
06/27/19	JSF	Examine Documents Asset Review - Update on Status of Portfolio	.70	563.50
06/27/19	EBW	Telephone Call(s) LC - teleconference with Receiver's professionals and ERC regarding abandonment.	.50	382.50
06/27/19	EBW	Telephone Call(s) LC - teleconferences with Receiver's professionals regarding abandonment.	.50	382.50
06/28/19	JSF	Examine Documents LC Energy Abandonment Motion and Related Issues	.40	322.00
06/28/19	EBW	Conference(s) In Office Dispositions - participation in bi-weekly team meeting. (EBW portion).	1.50	1,147.50
06/28/19	EBW	Preparation of Legal Papers Decision Diagnostics - revisions to motion to compel.	.80	612.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 58

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/28/19	EBW	Telephone Call(s) LC - teleconference with B. Weisenberg and counsel for potential purchaser.	.40	306.00
06/28/19	PCB	Correspondence Followup correspondence re: LC Energy and Decision Diagnostics.	.50	420.00
06/29/19	EBW	Analysis of Legal Papers LC - review of purchase proposal.	.30	229.50
06/30/19	JSF	Examine Documents BLAB - Motion to Pay Counsel and Explanation of Status of Asset	.50	402.50
TOTAL PHASE P02			89.40	\$71,912.00

Phase: P04

Case Administration

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/19	JSF	Prepare Legal Papers Review of Fourth Quarter Status Report and Updates	1.40	1,127.00
04/01/19	EBW	Preparation of Legal Papers Administrative - preparation of status report.	.60	459.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 59

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/02/19	JSF	Prepare Legal Papers Status Report for First Quarter	.80	644.00
04/02/19	JSF	Examine Documents Updates on Litigations and Open Assets	1.80	1,449.00
04/02/19	JKH	Pacer-Docket Check Criminal Docket Check - Review docket and provide email summary regarding motion to quash and motion to exclude expert testimony	.30	88.50
04/03/19	JSF	Examine Documents Review of Updates on Ongoing Litigations and Claims Process and Asset Review	1.40	1,127.00
04/03/19	JSF	Prepare Legal Papers Status Report	.80	644.00
04/03/19	EBW	Preparation of Legal Papers Administrative - preparation of status report.	.80	612.00
04/03/19	EBW	Analysis of Legal Papers Professionals - attention to tolling agreements.	.20	153.00
04/03/19	EBW	Analysis of Legal Papers Defendants - review of criminal docket entries.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 60

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/03/19	ACS	Correspondence w/CoCounsel - Other E-mail to K McGrath and M Bradylyons re S&W	.10	86.50
04/04/19	EBW	Correspondence Investors - correspondence with W. Edwards regarding investor inquiry.	.10	76.50
04/05/19	EBW	Telephone Call(s) Investors - teleconference with W. Edwards regarding investor inquiry.	.10	76.50
04/05/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon N Jacobson re Landesman	.10	86.50
04/08/19	EBW	Preparation for Conference Investors - preparation for teleconference with investor regarding document request.	.10	76.50
04/08/19	EBW	Telephone Call(s) Investors - teleconference with investor regarding document request.	.20	153.00
04/08/19	EBW	Conference(s) In Office Investors - conference with Receiver regarding documents to investors.	.10	76.50
04/08/19	EBW	Analysis of Legal Papers Defendants - review of pleadings.	.40	306.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 61

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/08/19	ACS	Correspondence w/CoCounsel - Other Review e-mail from N. Jacobson re Landesman	.10	86.50
04/08/19	ACS	Correspondence w/CoCounsel - Other E-mail to B Weisenberg re Landesman	.10	86.50
04/08/19	JKH	Pacer-Docket Check Criminal Docket Check - reviewing multiple documents and preparing email summary of same	.90	265.50
04/09/19	ACS	Correspondence w/CoCounsel - Other E-mail from/to M. Brandylyons re S&W	.20	173.00
04/09/19	JKH	Pacer-Docket Check Platinum Criminal Docket Check - reviewing multiple motions and responses and preparing email summary of same	.80	236.00
04/10/19	AW	Obtaining Copies of Court Records Process server served subpoena	.90	265.50
04/10/19	JSF	Conference(s) in Office Meet with Receiver and ACS re: Retention and Payment of Experts in Litigation	.60	483.00
04/10/19	EBW	Conference(s) In Office Employees - conference with Receiver and A. Silverstein regarding employee issues.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 62

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/10/19	EBW	Correspondence D&O - correspondence with defendants regarding claims.	.10	76.50
04/10/19	EBW	Analysis of Legal Papers Defendants - analysis of criminal docket filings.	.30	229.50
04/10/19	EBW	Telephone Call(s) Employees - teleconference with B. Weisenberg regarding employee issues.	.30	229.50
04/10/19	EBW	Review Documents Professionals - attention to issues relating to claims by professionals.	.20	153.00
04/10/19	ACS	Conference(s) w/ CoCounsel - Other Meet with Receiver and telecon SEC re S&W	.50	432.50
04/10/19	JKH	Pacer-Docket Check Criminal Docket Check - reviewing multiple requests and replies; preparing emailing summary regarding same	.60	177.00
04/11/19	AW	Obtaining Copies of Court Records Spoke to clerk re: docket entry remove notice	.60	177.00
04/11/19	JSF	Prepare Legal Papers Prepare Agenda for Team Meeting	1.30	1,046.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 63

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/11/19	JSF	Prepare Legal Papers Status Report for First Quarter 2019	1.40	1,127.00
04/11/19	JSF	Examine Documents Receivership Order re: Retention and Payment of Experts	.60	483.00
04/11/19	EBW	Telephone Call(s) Administrative - teleconferences with B. Weisenberg and T. Rogers regarding insurance and other administrative issues.	.60	459.00
04/11/19	ACS	Correspondence w/CoCounsel - Other Review and edit update to Second Circuit drafted by S&W (.2) and e-mail to J. Grekin; K McGrath and M Bradylyons (.1)	.30	259.50
04/12/19	JSF	Prepare Legal Papers Status Report	3.60	2,898.00
04/12/19	JKH	Pacer-Docket Check Platinum Criminal Docket Check - reviewing letters and motions relating to upcoming trial; preparing email summary of same	.40	118.00
04/14/19	EBW	Correspondence Taxes - correspondence with T. Rogers regarding tax issue.	.10	76.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 64

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/14/19	EBW	Preparation of Legal Papers Administrative - preparation of status report.	.90	688.50
04/15/19	JSF	Prepare Legal Papers Draft Seventh Status Report to the Court	3.70	2,978.50
04/15/19	JSF	Telephone Call(s) Trey Rogers re: Tax Returns and Status Report	.20	161.00
04/15/19	JSF	Examine Documents First Quarter SFAR and Disbursement Report	.60	483.00
04/15/19	JSF	Examine Documents Notice to Investors for Filing on Website of Amended Complaint	.30	241.50
04/15/19	JSF	Examine Documents Platinum's Cash Position	.30	241.50
04/15/19	EBW	Correspondence Correspondence with client regarding status conference.	.20	153.00
04/15/19	EBW	Analysis of Legal Papers Defendants - review of filings and correspondence with receivership team regarding case commencement.	.40	306.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 65

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/15/19	JKH	Pacer-Docket Check Platinum Criminal Docket Check - Reviewing multiple requests; responses and orders regarding upcoming trial and preparing email summary of same	1.10	324.50
04/16/19	JSF	Prepare Legal Papers Revisions and Updates to Status Report	3.30	2,656.50
04/16/19	JSF	Examine Documents Team Meeting Agendas of Assets Under Review	.40	322.00
04/16/19	EBW	Legal Research Employees - attention to employee issues.	.30	229.50
04/16/19	EBW	Preparation of Legal Papers Administrative - preparation of status report.	.80	612.00
04/16/19	ACS	Review/correct Legal Papers Edit S&W term sheet	1.30	1,124.50
04/16/19	JKH	Pacer-Docket Check Platinum Criminal Docket - reviewing pre-trial motions/requests and preparing email summary of same	.40	118.00
04/17/19	JSF	Prepare Legal Papers Further Updates to Asset Reviews and Litigation Status in Status Report	2.30	1,851.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 66

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/17/19	JSF	Prepare Legal Papers Draft Motion to Permit Payment of Expert Fees	1.20	966.00
04/17/19	JSF	Examine Documents Accrued Administrative Expenses	.40	322.00
04/17/19	JSF	Examine Documents Updated Receivership Property List	.40	322.00
04/18/19	AW	Diary & Docket Med. session	.30	88.50
04/18/19	JSF	Conference(s) in Office Meeting to Discuss Status of Litigations; Budget; Retention of Experts and Meeting with SEC	.90	724.50
04/18/19	JSF	Prepare Legal Papers Revise Status Report to Incorporate Comments Received	1.80	1,449.00
04/18/19	JSF	Correspondence Cosimo Borrelli re: Update and Status Call	.10	80.50
04/18/19	PCB	Review/Revision of Documents Review; analysis and comment on draft Receiver's Seventh Status Report to the Court.	2.30	1,932.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 67

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/18/19		Review File	.40	336.00
	PCB	Review file re: Seventh Status Report transactional sections.		
04/18/19		Conference(s) w/ Client	1.00	865.00
	ACS	Meet with Receiver re expert retention procedures		
04/18/19		Pacer-Docket Check	.40	118.00
	JKH	Criminal Trial Update - reviewing documents related to discovery and exhibits before trial; preparing email summary of same		
04/18/19		Pacer-Docket Check	.60	177.00
	JKH	Criminal Docket Check - reviewing multiple requests regarding opening statements; preparing email summary regarding same		
04/19/19		Prepare Legal Papers	2.20	1,771.00
	JSF	Motion to Retain Experts and Pay Litigation Expenses		
04/19/19		Prepare Legal Papers	.80	644.00
	JSF	Revisions to Status Report		
04/19/19		Pacer-Docket Check	.10	29.50
	JKH	Criminal Docket Check - reviewing docket for jury selection/trial schedule; sending email update regarding same		

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 68

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/21/19	ACS	Review/correct Legal Papers Review and edit 7th status report	1.10	951.50
04/22/19	AW	Filing Papers at Court Filed Status Report	.50	147.50
04/22/19	JSF	Prepare Legal Papers Motion to Permit Retention of Experts and Pay Litigation Expenses	2.20	1,771.00
04/22/19	JSF	Prepare Legal Papers Finalize Status Report for Filing	1.60	1,288.00
04/22/19	JSF	Correspondence Judge Cogan - Status Report	.20	161.00
04/22/19	JSF	Examine Documents SFAR and Schedule of Receipts and Disbursements	.40	322.00
04/23/19	JSF	Telephone Call(s) NY City Department of Finance (Kathy Lee) re: Claim and Audit	.40	322.00
04/23/19	JSF	Telephone Call(s) Calls with Trey Rogers re: S&W Payments	.20	161.00
04/23/19	JSF	Examine Documents S&W Term Sheet	.50	402.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 69

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/23/19	JSF	Examine Documents Summary of Administrative Expenses	.40	322.00
04/23/19	JSF	Examine Documents Receivership Order re: NYC Department of Finance Inquiry Re: Audit Results	.40	322.00
04/23/19	ACS	Review/correct Brief for motion Edit expert protocols motion	.80	692.00
04/23/19	JKH	Correspondence Defendants - sending email update regarding opening statements in criminal trial	.10	29.50
04/24/19	JSF	Examine Documents Administrative Expenses; Payments and Receipts	.60	483.00
04/24/19	JKH	Pacer-Docket Check Defendants - reviewing criminal docket entries regarding opening statements; preparing email summary of same	.80	236.00
04/24/19	JKH	Correspondence Defendants - Preparing email to court reporter regarding expenses and options for criminal trial transcripts; reviewing reply and preparing additional response	.70	206.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 70

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/25/19	JSF	Prepare Legal Papers Prepare Team Meeting Agenda for Transactions and Administrative Matters	1.30	1,046.50
04/25/19	JSF	Telephone Call(s) Call with Cosimo Borrelli and Counsel (Lewis Baach Firm) re: Update on PPVA Intermediate Fund Activities	.50	402.50
04/25/19	EBW	Conference(s) In Office Defendants - conference with T. Rogers and Receiver regarding criminal trial.	.40	306.00
04/25/19	EBW	Telephone Call(s) PPVA Feeder - teleconference with J. Feeney and JOL regarding items of mutual interest.	.50	382.50
04/25/19	EBW	Preparation for Conference Administrative - preparation for bi-weekly litigation and disposition conference with team.	.30	229.50
04/25/19	JKH	Pacer-Docket Check Defendants - reviewing documents relating to trial motions and providing email summary of same	.80	236.00
04/25/19	JKH	Analyze Documents Review tolling agreement for expiration and calendaring same with reminder	.20	59.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 71

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/26/19	EBW	Analysis of Legal Papers Defendants - review of updates on criminal trial.	.40	306.00
04/26/19	JKH	Review Documents Defendants - reviewing trial update and preparing and sending email of same	.20	59.00
04/26/19	JKH	Examine Transcript Defendants - receiving and reviewing transcript of opening statements	.30	88.50
04/26/19	JKH	Review Documents Defendants - reviewing multiple motions relating to criminal trial witnesses; preparing email summary of same	1.10	324.50
04/29/19	AW	Filing Papers at Court Field NOA in all case SDNY	.60	177.00
04/29/19	EBW	Attend Court Defendants - attendance at expected testimony of former Platinum officer.	2.20	1,683.00
04/29/19	EBW	Preparation of Legal Papers Investors - preparation of confidentiality stipulation governing document production.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 72

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/29/19	JKH	Review Documents Defendants - reviewing multiple motions in criminal trial regarding witness testimony; preparing email summary of same	1.20	354.00
04/30/19	JSF	Prepare Legal Papers Revisions to Motion to Retain Experts	1.60	1,288.00
04/30/19	JSF	Prepare Legal Papers Declaration of Receiver in Support of Motion to Approve Procedures for Retaining Experts	2.80	2,254.00
04/30/19	EBW	Analysis of Legal Papers Defendants - review of pleadings and case developments.	.40	306.00
04/30/19	JKH	Correspondence Defendants - email exchanges with court reporter to order 4/29 transcript	.10	29.50
05/01/19	JSF	Prepare Legal Papers Review and Revise Motion Papers for Procedures to Retain Experts	2.40	1,932.00
05/01/19	JSF	Examine Documents Updated Status Report - Review of Transactions	1.70	1,368.50
05/01/19	EBW	Review Documents Investors - attention to website issues.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 73

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/19	EBW	Telephone Call(s) PPVA - teleconference with counsel for PPVA regarding items of mutual interest.	.20	153.00
05/01/19	EBW	Preparation of Legal Papers Investors - revisions to confidentiality stipulation.	.30	229.50
05/02/19	AW	Filing Papers at Court Filed Service affidavits with summons	1.90	560.50
05/02/19	JSF	Prepare Legal Papers Revision to MLC Declaration in Support of Expert Retention	.90	724.50
05/02/19	JSF	Prepare Legal Papers Proposed Order re: Retention of Experts	.60	483.00
05/02/19	EBW	Correspondence Investors - correspondence with investors regarding criminal trial.	.10	76.50
05/02/19	EBW	Preparation of Legal Papers Investors - preparation of confidentiality stipulation.	.40	306.00
05/02/19	EBW	Conference(s) In Office Investors - conference with receivership team regarding confidentiality stipulation.	.30	229.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 74

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/02/19	EBW	Telephone Call(s) Investors - teleconference with W. Edwards and B. Weisenberg regarding investor inquiry on criminal trial.	.10	76.50
05/02/19	EBW	Analysis of Legal Papers Administrative - review of motion to retain experts.	.40	306.00
05/02/19	ACS	Review/correct Brief for motion Further edit expert retention procedures motion	1.00	865.00
05/02/19	JKH	Review Documents Defendants - reviewing criminal docket entries and sending email update regarding same	.30	88.50
05/03/19	AW	Diary & Docket Answer due/ d/l tolling expires	.60	177.00
05/03/19	AW	Diary & Docket D/l move to dismiss/ d/l joinder due	.60	177.00
05/03/19	JSF	Prepare Legal Papers Review and Revise Motion to Approve Procedures to Retain Experts	.60	483.00
05/03/19	EBW	Telephone Call(s) Investors - teleconference with counsel for investors regarding document review.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 75

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/03/19	JKH	Pacer-Docket Check Defendants - reviewing docket for updates on trial and reporting on same	.20	59.00
05/03/19	JKH	Pacer-Docket Check Defendants - reviewing criminal docket and preparing email summary re: orders and motions	.40	118.00
05/06/19	JSF	Examine Documents Prior Status Report to Investors/Creditors	1.40	1,127.00
05/06/19	JSF	Examine Documents Motion re: Expert Retention - Update on Status of Retentions	.30	241.50
05/06/19	EBW	Attend Court Defendants - attendance at criminal trial.	2.50	1,912.50
05/06/19	EBW	Preparation of Legal Papers Administrative - preparation of status report.	1.20	918.00
05/06/19	JKH	Pacer-Docket Check Defendants - reviewing motions and responses regarding witness testimony; preparing email summary of same	.80	236.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 76

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/07/19	EBW	Conference(s) In Office Administrative - conference with Receiver regarding Agera; criminal trial; LC Energy and Arabella.	.40	306.00
05/07/19	EBW	Telephone Call(s) Cashcall - teleconference with counsel for subpoena issuer; including pre-call with B. Weisenberg.	.60	459.00
05/07/19	JKH	Pacer-Docket Check Defendants - reviewing motions and responses regarding witness testimony and summarizing same	.70	206.50
05/08/19	AW	Filing Papers at Court Filed Mtion with supporting Documents Re: Motion to Retain Experts	1.30	383.50
05/08/19	JSF	Examine Documents Review and Finalize Motion Papers for Approval of Procedures to Retain Experts	1.40	1,127.00
05/08/19	JSF	Correspondence Letter to Judge Cogan with Materials re: Retained Experts	.20	161.00
05/08/19	EBW	Analysis of Legal Papers Taxes - attention to; and analysis of research and documents relating to NYC Finance audits.	1.10	841.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 77

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/08/19	EBW	Telephone Call(s) Black Elk - teleconference with T. Rogers regarding trustee actions and research.	.30	229.50
05/08/19	ACS	Review/correct Brief for motion Edit and finalize exhibits to expert retention protocol motion	.40	346.00
05/08/19	JKH	Pacer-Docket Check Defendants - reviewing order of release and related documents and preparing email summary of same	.20	59.00
05/08/19	JKH	Pacer-Docket Check Black Elk - Reviewing docket for filings regarding settlement	1.80	531.00
05/08/19	JKH	Prepare Legal Papers Preparing chamber and SEC copies regarding retention documents	.40	118.00
05/08/19	JKH	Correspondence Preparing letters to chambers and SEC enclosing retention documents	.40	118.00
05/09/19	AW	Diary & Docket D/l response	.30	88.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 78

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/09/19	JSF	Correspondence To SEC and to Judge Cogan re: Motion for Procedures to Retain Experts and Confidential Materials re: Experts	.40	322.00
05/09/19	JSF	Prepare Legal Papers Agenda for Platinum Team Meeting	1.20	966.00
05/09/19	EBW	Analysis of Legal Papers Taxes - attention to NYC tax issues; including correspondence and teleconferences with B. Weisenberg and T. Rogers.	.70	535.50
05/09/19	ACS	Review/correct Legal Papers Further edit S&W term sheet and e-mail Receiver	.80	692.00
05/09/19	ACS	Review/correct Legal Papers Further edit S&W term sheet and e-mail to SEC	.20	173.00
05/09/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with Receiver and telecon N Jacobson re S&W	.30	259.50
05/09/19	ACS	Telephone Call(s) w/CoCounsel - Other Second Circuit CAMP conference re S&W appeal	.50	432.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 79

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/09/19	JKH	Pacer-Docket Check Defendants - reviewing criminal docket entries regarding witness testimony; preparing email summary of same	.70	206.50
05/10/19	EBW	Preparation for Conference Administrative - preparation for bi-weekly meeting.	.20	153.00
05/10/19	EBW	Telephone Call(s) Investors - preparation for; and participation in; teleconference with foreign investors regarding status.	.90	688.50
05/10/19	ACS	Review/correct Legal Papers Further revise S&W term sheet	.50	432.50
05/10/19	ACS	Correspondence w/CoCounsel - Other E-mail to N Jacobson re S&W	.20	173.00
05/10/19	ACS	Correspondence w/CoCounsel - Other E-mail to S Rhodes re revised S&W term sheet	.40	346.00
05/10/19	JKH	Correspondence Defendants - Regarding criminal trial transcripts	.40	118.00
05/13/19	EBW	Preparation of Memorandum Administrative - preparation of status report.	1.60	1,224.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 80

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/13/19	JKH	Review Documents Black Elk - Reviewing docket re settlement with Trustee	.20	59.00
05/13/19	JKH	Pacer-Docket Check Defendants - reviewing criminal docket and preparing summary of motions regarding testimony	.30	88.50
05/14/19	JSF	Examine Documents Ordinary Course Professionals - Status of Fees	.30	241.50
05/14/19	EBW	Correspondence Investors - correspondence with receivership team regarding inquiry on hold back of redemption.	.10	76.50
05/14/19	ACS	Conference(s) w/ CoCounsel - Other Meet with EBW to prepare for scheduled meeting with SEC	.50	432.50
05/14/19	ACS	Review/correct Legal Papers Edit draft joint status report to 2nd Circuit re S&W and e-mail to J Grekin and N Jacobson	.20	173.00
05/14/19	GSL	Document Review Document Review - Black Elk Folder	.40	118.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 81

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/15/19	AW	Filing Papers at Court Filed Services of Complaint	.90	265.50
05/15/19	AW	Filing Papers at Court Subpoena to service	.80	236.00
05/16/19	AW	Diary & Docket Conference	.70	206.50
05/16/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon J Potts and M Franek re subordination mechanics in Black Elk settlement	.30	259.50
05/17/19	EBW	Correspondence Defendants - correspondence with PPVA counsel and T. Rogers regarding items of mutual interest.	.20	153.00
05/20/19	JSF	Telephone Call(s) S&W - Participate with Receiver in CAMP Conference (partial)	.60	483.00
05/20/19	EBW	Telephone Call(s) PPVA - teleconference with PPVA's counsel regarding items of mutual interest.	.10	76.50
05/20/19	EBW	Telephone Call(s) S&W - participation in CAMP conference.	1.50	1,147.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 82

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/20/19	JKH	Pacer-Docket Check Defendants - reviewing criminal docket and providing email update summary regarding witness testimony	.30	88.50
05/21/19	JSF	Examine Documents Review of Updates to Frequently Asked Questions	.60	483.00
05/21/19	JSF	Examine Documents Analysis and Review of Administrative Expenses	.90	724.50
05/21/19	EBW	Correspondence Investors - attention to website FAQ issues.	.30	229.50
05/21/19	EBW	Conference(s) In Office Defendants - conference with T. Rogers regarding criminal trial.	.40	306.00
05/22/19	JSF	Correspondence Goldin and Otterbourg Team re: Upcoming Meeting	.20	161.00
05/22/19	EBW	Correspondence Investors - correspondence with receivership team regarding investor inquiry.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 83

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/22/19	EBW	Analysis of Legal Papers Defendants - review of criminal case pleadings.	.30	229.50
05/22/19	JKH	Pacer-Docket Check Defendants - reviewing criminal docket and provide email summary regarding witness testimony	.20	59.00
05/23/19	AW	Diary & Docket Report due	.30	88.50
05/24/19	EBW	Review Documents Administrative - analysis of documents and issues regarding status report.	.40	306.00
05/28/19	JKH	Pacer-Docket Check Defendants - reviewing multiple filings on criminal docket regarding witness testimony and preparing email summary of same	.90	265.50
05/29/19	JSF	Correspondence Updates to Frequently Asked Questions for Investors/Creditors	.50	402.50
05/29/19	EBW	Telephone Call(s) Cashcall - teleconference with counsel for Katten regarding subpoena.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 84

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/29/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon T. Rogers re criminal trial	.60	519.00
05/29/19	JKH	Pacer-Docket Check Defendants - reviewing criminal docket filings and preparing email summary regarding Mandelbaum testimony	.60	177.00
05/30/19	ACS	Correspondence w/CoCounsel - Other E-mail from/to S. Rhodes re S&W term sheet	.20	173.00
05/30/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon T. Rogers re criminal trial	.30	259.50
05/30/19	JKH	Pacer-Docket Check Defendants - Review docket entry regarding witness testimony; providing email summary of same	.20	59.00
05/30/19	JKH	Correspondence Defendants - review of emails regarding criminal trial transcripts	.20	59.00
05/31/19	JKH	Review Documents Defendants - reviewing criminal docket entries regarding Mandelbaum testimony and preparing email summary of same	.20	59.00
06/04/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon N Kritzer re his inquiry re status	.10	86.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 85

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/04/19	JKH	Review Documents BDO - search for contact regarding extension for tolling agreement; preparing email reporting same	.10	29.50
06/05/19	EBW	Telephone Call(s) PPVA - teleconference with counsel for feeder fund regarding items of mutual interest.	.20	153.00
06/06/19	AW	Diary & Docket Opp.	.30	88.50
06/07/19	JKH	Pacer-Docket Check Defendants - reviewing various motions and orders filed on criminal docket and preparing email summary of same	.70	206.50
06/07/19	JKH	Draft/revise A&M - revise amended tolling agreement	.20	59.00
06/10/19	CMO	Analysis of Legal Papers Re: better process address for Senior Heath Care Oversight Fund	.20	59.00
06/10/19	JSF	Examine Documents Asset Review and Preparation for Next Status Report	1.80	1,449.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 86

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/10/19	JKH	Pacer-Docket Check Defendants - Reviewing motions regarding preclusion of exhibits and defendants' rule 29 motion; preparing email summary of same	.60	177.00
06/11/19	CMO	Telephone Call(s) re: Legal Papers With CSC re: registered agent for Senior Health Care Oversight Trust	.20	59.00
06/11/19	CMO	Research re Legal Papers Research where Senior Health Care Oversight Trust can be served	.30	88.50
06/11/19	JSF	Prepare Legal Papers Receiver's update for investors	1.20	966.00
06/11/19	JSF	Examine Documents Defendants - Update on Criminal Trial	.30	241.50
06/11/19	JKH	Pacer-Docket Check Defendants - Review of multiple filings regarding Rule 29 motions and witnesses; providing email summary of same	.90	265.50
06/13/19	JSF	Prepare Legal Papers Review Active Activities and Prepare Agenda for Team Meeting	1.80	1,449.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 87

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/13/19	EBW	Conference(s) In Office Administrative - conference with P. Poteat regarding administrative issues.	.20	153.00
06/13/19	EBW	Preparation of Legal Papers Administrative - preparation of status report.	2.40	1,836.00
06/14/19	JSF	Conference(s) in Office Meeting with Receiver; EBW; Marc Kirshner and Will Edwards to Prepare for SEC Meeting	.50	402.50
06/14/19	JSF	Examine Documents Agenda for Items to Discuss with SEC	.30	241.50
06/14/19	EBW	Preparation of Legal Papers Administrative - preparation of status report.	1.50	1,147.50
06/15/19	JSF	Prepare Legal Papers Status Report - Updates	1.40	1,127.00
06/17/19	JSF	Prepare Legal Papers Asset Review and Preparation for Next Status Report	2.70	2,173.50
06/17/19	JSF	Examine Documents Goldin Update on Status of Assets	1.30	1,046.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 88

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/17/19	EBW	Preparation of Memorandum Administrative - preparation of status report.	3.20	2,448.00
06/17/19	ACS	Analysis of Legal Papers Review S&W update to 2nd Cir (.1) and e-mail Receiver re same (.1)	.20	173.00
06/17/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon S Rhodes re S&W	.20	173.00
06/17/19	ACS	Telephone Call(s) w/Adversary Telecon J Grekin (.1); revise draft status report to 2nd Circuit (.1); e-mail to J. Grekinand re: S&W	.30	259.50
06/17/19	JKH	Pacer-Docket Check Defendants - review of criminal docket regarding defendants motion and order on various motions; providing email summary of same	.70	206.50
06/18/19	JSF	Telephone Call(s) Call with Goldin Team and Receiver re: Review of Presentation to SEC	.50	402.50
06/18/19	JSF	Examine Documents Presentation Materials to SEC	1.60	1,288.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 89

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/18/19	JSF	Correspondence Information to Alois Chakabva for Presentation Deck to SEC	1.20	966.00
06/18/19	EBW	Telephone Call(s) Adminstrative - teleconference with Goldin regarding status report.	.50	382.50
06/18/19	EBW	Preparation of Memorandum Administrative - preparation of status report.	4.40	3,366.00
06/18/19	ACS	Preparation for Conference Prepare of status report	1.30	1,124.50
06/18/19	ACS	Conference(s) w/ CoCounsel - Other Meet with EBW re status report	.60	519.00
06/18/19	JKH	Correspondence Defendants - preparing follow-up email to J. King regarding criminal trial transcripts	.20	59.00
06/18/19	JKH	Review Documents Defendants - reviewing and profiling criminal trial transcripts	.80	236.00
06/19/19	JSF	Examine Documents Revised Presentation for SEC Meeting	.80	644.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 90

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/19/19	JSF	Prepare Legal Papers Update of Sections for Report to Investors	2.30	1,851.50
06/19/19	EBW	Preparation of Legal Papers Administrative - update of status report.	2.00	1,530.00
06/19/19	EBW	Telephone Call(s) PPVA - teleconference with counsel for PPVA Feeder regarding items of mutual interest.	.20	153.00
06/19/19	EBW	Conference(s) in Office Administrative - conference with Receiver and Goldin in preparation for SEC meeting.	1.50	1,147.50
06/19/19	EBW	Conference out of Office Administrative meeting with SEC	1.50	1,147.50
06/19/19	ACS	Conference(s) w/ CoCounsel - Other Prepare with EBW; W. Edwards and Receiver for SEC meeting	1.50	1,297.50
06/19/19	ACS	Attendance at Conference Meeting with SEC	1.50	1,297.50
06/20/19	AW	Diary & Docket Reply due	.90	265.50
06/20/19	JSF	Conference(s) in Office Receiver re: Report from SEC Meeting	.40	322.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 91

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/20/19	EBW	Telephone Call(s) Cashcall - teleconference with counsel for subpoena issuer.	.30	229.50
06/20/19	JKH	Pacer-Docket Check Defendants - reviewing criminal docket entries regarding Franks Hearing	.60	177.00
06/21/19	EBW	Preparation of Legal Papers Administrative - revisions to status report.	.60	459.00
06/21/19	EBW	Correspondence Investors - correspondence with team regarding investor tax inquiries.	.20	153.00
06/24/19	JSF	Examine Documents Cash Position and Administrative Expenses	.70	563.50
06/24/19	JSF	Prepare Legal Papers Quarterly Report of Receiver	.80	644.00
06/24/19	PCB	Review/Revision of Documents Review and comment on quarterly report.	1.30	1,092.00
06/25/19	JSF	Examine Documents Begin Preparation for Town Hall - Update to Investors	1.60	1,288.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 92

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/25/19	EBW	Analysis of Legal Papers Employees - analysis of; and preliminary preparation of response to; motion for payment by former employee.	.80	612.00
06/26/19	AW	Filing Papers at Court Filed Opposition SDNY	1.30	383.50
06/26/19	GSL	Letter(s)-Court Prepared cover letter / courtesy copy of joint opposition to BCLIC/WNIC motion to enforce security statutes for Judge Rakoff	.40	118.00
06/27/19	JSF	Prepare Legal Papers Agenda for Team Meeting	.70	563.50
06/27/19	JSF	Examine Documents Prepare for Team Meeting - Open Issues for Discussion	.60	483.00
06/27/19	EBW	Preparation of Legal Papers Employees - preparation of response to employee motion for payment.	2.30	1,759.50
06/27/19	EBW	Analysis of Legal Papers Analysis of Forefront scheduling stipulation and correspondence with client and co-counsel regarding the same.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 93

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/28/19	EBW	Preparation for Conference Administrative - preparation for bi-weekly disposition meeting.	.60	459.00
06/28/19	EBW	Preparation of Legal Papers Employees - preparation of opposition to Salfati motion.	1.80	1,377.00
06/28/19	ACS	Analysis of Legal Papers Review e-mails and draft suppression letter from Black Elk trustee re suppression of Platinum's distribution per settlement	.30	259.50
TOTAL PHASE P04			195.60	\$136,418.00

---

Phase: P05 Claims Administration & Objections

---

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/02/19	EBW	Analysis of Legal Papers Claims - analysis of claims and claims issues.	.40	306.00
04/03/19	EBW	Analysis of Legal Papers Claims - analysis of claims issues.	.20	153.00
04/12/19	EBW	Analysis of Legal Papers Claims - analysis of proofs of claim.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 94

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/23/19	JSF	Examine Documents Claims Order and Bar Date	.30	241.50
05/03/19	JSF	Correspondence Robert Levy re: Response to Inquiry re: Status of Claims Process	.10	80.50
05/03/19	JSF	Examine Documents Status Report re: Notice on Claims Review Process	.30	241.50
06/19/19	JSF	Examine Documents Claims Update	.40	322.00
TOTAL PHASE P05			2.00	\$1,574.00

---

Phase: P10 Forensic Accounting

---

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/06/19	ASH	Analysis of Legal Papers Review tolling agreements with various parties to determine new deadlines; e-mail to ACS; GLS and EBW regarding same	.40	304.00
04/10/19	EBW	Preparation of Legal Papers Forensics - review and execution of subpoena for corporate documents.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 95

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/16/19	ASH	Analysis of Stipulation Stipulation for Brent Weisenberg; e-mails to Brent Weisenberg regarding same	.10	76.00
04/23/19	ASH	Examine Documents Review tolling agreement with opposing party	.20	152.00
04/23/19	ASH	Correspondence w/Adversary to opposing counsel regarding possible amendment to tolling agreement	.10	76.00
04/23/19	WMM	Legal services/Legal Papers Communications concerning drafting amended tolling agreement with third party and reviewing prior agreement.	1.00	795.00
04/24/19	ASH	Review/correct Legal Papers Amendment to Tolling Agreement; e-mails to attorney for counterparty to agreement and others regarding same	.60	456.00
04/24/19	WMM	Preparation of Legal Papers Draft Amended Tolling Agreement with third party and communications concerning same.	3.50	2,782.50
04/25/19	ASH	Examine Documents Amendment to tolling agreement from opposing counsel; e-mails to EBW and WMM and counterparty to tolling agreement regarding amendment to tolling agreement	.40	304.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 96

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/25/19	EBW	Correspondence Forensics - correspondence and teleconference with counsel for subpoena recipient.	.10	76.50
04/25/19	EBW	Correspondence Forensics - correspondence with tolling agreement counter-party.	.10	76.50
04/25/19	WMM	Legal services/Legal Papers Analyze revised Amended Tolling Agreement and communications concerning same.	1.00	795.00
04/29/19	ASH	Examine Documents Tolling agreements; conferences with GSL and JKH regarding same	.20	152.00
04/29/19	JKH	Review Documents Reviewing tolling agreements	.60	177.00
05/02/19	EBW	Analysis of Legal Papers Forensics - attention to issues regarding outstanding subpoenas.	.40	306.00
05/02/19	GSL	Analysis/Strategy Prepared chart on tolling agreements/deadlines	.60	177.00
05/03/19	EBW	Preparation for Conference Forensics - preparation for teleconference with counsel for subpoena recipient.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 97

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/03/19	EBW	Telephone Call(s) Forensics - teleconference with counsel for subpoena recipient.	.30	229.50
05/07/19	ASH	Examine Documents tolling agreements	.20	152.00
05/14/19	ACS	Review/correct Legal Papers Edit BDO subpoena requests	1.10	951.50
05/20/19	EBW	Correspondence Forensics - correspondence and teleconference with B. Weisenberg regarding forensic investigations.	.20	153.00
05/22/19	EBW	Correspondence Forensics - correspondence with receivership team regarding third-party subpoena response.	.10	76.50
05/28/19	EBW	Telephone Call(s) Forensics - teleconferences with T. Rogers and B. Weisenberg regarding potential causes of action.	.60	459.00
05/28/19	EBW	Correspondence Forensics - correspondence with Receivership team regarding outside inquiry.	.20	153.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 98

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/29/19	ASH	Analysis of Resp to disc. device Review BDO's objections to subpoena; review correspondence from BDO's counsel regarding same	.20	152.00
05/30/19	ACS	Analysis of Legal Papers Review BDO's objections to subpoena	.20	173.00
05/30/19	ACS	Correspondence w/CoCounsel - Other E-mail from/to B. Martin re BDO objections	.20	173.00
06/05/19	EBW	Review Documents Forensics - attention to tolling agreements.	.20	153.00
06/05/19	JKH	Diary & Docket BDO - review email and calendar new tolling agreement date	.10	29.50
06/05/19	JKH	Prepare Legal Papers BDO - Draft Second Amended Tolling Agreement	.90	265.50
06/05/19	JKH	Draft/revise BDO - making edits and preparing final clean copy of Second Amended Tolling Agreement	.20	59.00
06/06/19	EBW	Correspondence Forensics - correspondence with counsel for tolling agreement counter-parties.	.40	306.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 99

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/06/19	JKH	Review Documents A&M - Review of previous Tolling Agreement and looking up other side contact information	.20	59.00
06/06/19	JKH	Prepare Legal Papers A&M - Prepare draft Amended Tolling Agreement	.60	177.00
06/13/19	ASH	Review/correct Subpoena Revise subpoena	.20	152.00
06/18/19	JKH	Draft/revise Updating tolling agreement chart	.30	88.50
06/19/19	EBW	Correspondence Forensics - correspondence with subpoena recipient regarding response.	.10	76.50
06/21/19	EBW	Correspondence Forensics - correspondence regarding subpoenas.	.20	153.00
06/26/19	EBW	Analysis of Legal Papers Forensics - analysis of confidentiality stipulation.	.40	306.00
TOTAL PHASE P10			16.90	\$11,585.50

Phase: P14

BEECHWOOD LITIGATION

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 100

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/19	ASH	Analysis of Correspondence Recent correspondence from opposing counsel in consolidated Beechwood actions regarding discovery and other issues	.20	152.00
04/01/19	ASH	Correspondence w/Client To Trey Rogers; Alois Chakabva and Karthik Bhavaraju regarding possible meeting and e-mail to opposing counsel	.10	76.00
04/01/19	ASH	Examine Documents Documents produced by the CNO Defendants	.70	532.00
04/01/19	ASH	Examine Documents Review documents regarding Beechwood Reinsurance Trusts	.20	152.00
04/01/19	ASH	Correspondence w/Adversary revise correspondence to counsel for the CNO Defendants	.10	76.00
04/01/19	EBW	Telephone Call(s) Beechwood - teleconference with vendor and adversaries regarding production process.	.90	688.50
04/01/19	EBW	Telephone Call(s) Beechwood - teleconference with vendor regarding production process.	.40	306.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 101

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/19	EBW	Preparation for Conference Beechwood - preparation for discovery call with adversaries.	.30	229.50
04/01/19	EBW	Correspondence Beechwood - correspondence with court regarding filings.	.40	306.00
04/01/19	EBW	Legal Research Beechwood - attention to legal research and strategy.	1.60	1,224.00
04/01/19	EBW	Analysis of Legal Papers Beechwood - analysis of PPVA's amended complaint and CNO's cross-claims.	1.10	841.50
04/01/19	GSL	Review/correct Trial transcript Review of PPVA Oral Argument Transcript - re Ex. 31	.20	59.00
04/01/19	GSL	Pacer-Docket Check Review of docket / emails from clerk for updates on briefing schedule	.50	147.50
04/01/19	GSL	Prepare Order Prepared and filed proposed order granting leave to refile amended complaint to comply with requests of Clerk of Court	2.30	678.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 102

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/19	GSL	Analysis/Strategy Research for request of issuance of summons for new party - re Amended Complaint	1.00	295.00
04/01/19	JKH	Filing Papers at Court Beechwood - Travel to court to file sealed document (Half)	.90	265.50
04/01/19	JKH	Prepare Legal Papers Beechwood - preparing chamber copies of sealed and redacted amended complaint	.80	236.00
04/01/19	JKH	Filing Papers at Court Beechwood - pursuant to court instructions; re-filing amended complaint	1.20	354.00
04/01/19	JKH	Prepare Legal Papers Beechwood - preparing electronic cd copies of sealed amended complaint	.30	88.50
04/01/19	JKH	Draft/revise Beechwood - editing letter to chambers to reflect re-filed amended complaint	.20	59.00
04/01/19	WMM	Legal services/Legal Papers Communications concerning pleading issues with court.	.50	397.50
04/02/19	CMO	Analysis of Resp to disc. device Re: additional CNO document production	.30	88.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 103

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/02/19	ASH	Analysis of Correspondence Correspondence from opposing counsel regarding discovery issues	.20	152.00
04/02/19	ASH	Analysis of Stipulation Analyze protective orders	.20	152.00
04/02/19	ASH	Correspondence w/Adversary To counsel for Beechwood Reinsurance Trusts regarding request for documents	.40	304.00
04/02/19	EBW	Correspondence Beechwood - correspondence with adversaries regarding discovery issues.	.80	612.00
04/02/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for SHIP regarding discovery issues.	.10	76.50
04/02/19	EBW	Correspondence Beechwood - correspondence with vendor and review of vendor document production agreements.	.80	612.00
04/02/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for PPVA regarding discovery process.	.10	76.50
04/02/19	EBW	Analysis of Legal Papers Beechwood - review of CNO complaint.	1.50	1,147.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 104

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/02/19	EBW	Analysis of Legal Papers Beechwood - analysis of PPVA second amended complaint.	1.20	918.00
04/02/19	GSL	Analysis/Strategy Continued research - re motions to dismiss	.80	236.00
04/02/19	GSL	Analysis/Strategy Continued research - re Motions to Dismiss	.60	177.00
04/02/19	JKH	Telephone Call(s) Beechwood - call with clerk regarding filing of amended complaint	.20	59.00
04/03/19	CMO	Analysis of Resp to disc. device Additional CNO download	.50	147.50
04/03/19	ASH	Telephone Call(s) w/CoCounsel - Other With counsel for SHIP; CNO; PPVA and Beechwood regarding issues regarding Beechwood's refusal to produce all documents provided to SEC	.30	228.00
04/03/19	ASH	Telephone Call(s) w/CoCounsel - Other With counsel for SHIP and PPVA regarding meet and confer regarding documents produced to SEC (2)	.30	228.00
04/03/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with EBW and opposing counsel regarding discovery	.50	380.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 105

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/03/19	ASH	Analysis of Legal Papers Correspondence with counsel for Sterling; email to EBW regarding same	.20	152.00
04/03/19	ASH	Examine Documents Searches for subpoena issued by SEC to Beechwood	.40	304.00
04/03/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for PPVA regarding document production.	.20	153.00
04/03/19	EBW	Telephone Call(s) Beechwood - teleconferences with adversaries regarding SHIP/Beechwood document production issues.	.70	535.50
04/03/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for Bodner group regarding privilege issues.	.80	612.00
04/03/19	EBW	Telephone Call(s) Beechwood - teleconference with B. Weisenberg regarding strategy.	.30	229.50
04/03/19	EBW	Telephone Call(s) Beechwood - teleconference and correspondence with P. Poteat regarding document production issues.	.40	306.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 106

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/03/19	EBW	Analysis of Legal Papers Beechwood - analysis of CNO complaint and PPVA complaint.	1.80	1,377.00
04/03/19	GSL	Analysis/Strategy Reviewed CNO's Answer/Cross Claims - re preparation for motions to dismiss	3.70	1,091.50
04/03/19	GSL	Analysis/Strategy Prepared chart with notes on CNO's Answer/Cross Claims	3.50	1,032.50
04/03/19	GSL	Analysis/Strategy Reviewed Beechwood Defendant's responses to discovery requests/interrogatories	.40	118.00
04/04/19	ASH	Conference(s) w/ CoCounsel - Other meeting with Brent Weisenberg; EBW and WMM regarding current status of action	1.20	912.00
04/04/19	EBW	Conference(s) In Office Beechwood - strategy conference with B. Weisenberg; W. Moran and A. Halpern.	1.20	918.00
04/04/19	EBW	Preparation for Conference Beechwood - preparation for strategy conference.	1.60	1,224.00
04/04/19	EBW	Conference(s) In Office Beechwood - conference with Receiver regarding discovery and privilege issues.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 107

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/04/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for PPVA regarding items of mutual interest.	.50	382.50
04/04/19	EBW	Correspondence Beechwood - correspondence with PPVA counsel and document vendor regarding discovery.	.40	306.00
04/04/19	EBW	Review Documents Beechwood - attention to discovery issues.	1.20	918.00
04/04/19	GSL	Analysis/Strategy Additional review of BCLIC/WNIC's Answer/Cross Claims	2.00	590.00
04/04/19	GSL	Analysis/Strategy Continued summarizing BCLIC/WNIC's Answer/Cross Claims	3.20	944.00
04/04/19	GSL	Analysis/Strategy Reviewed the Receiver's Amended Complaint in preparation for motions to dismiss	2.20	649.00
04/04/19	WMM	Legal services/Conference Team conference concerning status and strategy.	1.00	795.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 108

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/04/19	WMM	Legal services/Conference Consideration of agenda items concerning best course of action for discovery review and service upon Beechwood Bermuda Inv. Holdings.	.70	556.50
04/04/19	WMM	Legal services/Legal Papers Reviewing analysis of Answer filed while motion to dismiss is pending.	.80	636.00
04/04/19	WMM	Legal services/Legal Papers Consideration of data storage items and inclusion into universe of documents to be produced.	.90	715.50
04/05/19	ASH	Conference(s) w/ CoCounsel - Other Meet with EBW and ACS re discovery protocol in Beechwood for possible use in arbitration	.50	380.00
04/05/19	ASH	Analysis of Stipulation Analyze revisions to 502(d) Order by Curtis Mallet and Holland & Knight	.20	152.00
04/05/19	ASH	Research re Stipulation regarding revisions to Rule 502(d) order	.50	380.00
04/05/19	ASH	Memorandum to CoCounsel - Other Regarding revised 502(d) order	.10	76.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 109

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/05/19	ASH	Review/correct Correspondence to opposing counsel regarding discovery	.20	152.00
04/05/19	ASH	Analysis of Order Arbitrators' order regarding motion to compel discovery in arbitration involving CNO Defendants and Beechwood parties	.10	76.00
04/05/19	ASH	Analysis of Legal Papers Chart of admissions prepared by GSL; admissions in Answer	.30	228.00
04/05/19	EBW	Analysis of Legal Papers Beechwood - review of pleadings.	2.40	1,836.00
04/05/19	EBW	Analysis of Legal Papers Beechwood - attention to legal issues regarding 502(d) order and related discovery issues.	2.80	2,142.00
04/05/19	EBW	Correspondence Beechwood - correspondence with adversaries regarding discovery issues.	.30	229.50
04/05/19	EBW	Telephone Call(s) Beechwood - teleconferences and correspondence with counsel for PPVA regarding discovery issues.	.40	306.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 110

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/05/19	ACS	Conference(s) w/ CoCounsel - Other Meet with EBW and ASH re discovery protocol in Beechwood and arbitration	.50	432.50
04/05/19	GSL	Analysis/Strategy Contiued review of the Amended Complaint in preparation for motions to dismiss	1.80	531.00
04/05/19	GSL	Analysis/Strategy Annotated the Receiver's Amended Complaint - re notes from chart	2.70	796.50
04/05/19	GSL	Analysis/Strategy Prepared chart for causes of action in the Amended Complaint	1.90	560.50
04/05/19	GSL	Analysis/Strategy Research for chart on causes of action - re Amended Complaint	1.90	560.50
04/05/19	WMM	Legal services/Legal Papers Communications concerning updates to adversaries and proposed revisions to 502(d); and review same.	.70	556.50
04/06/19	ASH	Correspondence w/Adversary to counsel for the Beechwood Reinsurance Trusts regarding information requests; review background documents regarding same	1.70	1,292.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 111

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/08/19	CMO	Analysis of Resp to disc. device External drive back up of CNO production	1.60	472.00
04/08/19	ASH	Conference(s) w/ CoCounsel - Other With Brent Weisenberg; Trey Rogers; Paul Poteat; EBW and WMM regarding issues regarding documents production	1.00	760.00
04/08/19	ASH	Review/correct Stipulation Revise 502(d) Order; analyze background documents and e-mails regarding same	.30	228.00
04/08/19	ASH	Telephone Call(s) w/CoCounsel - Other Conference call with EBW; Holland & Knight and Curtis Mallet regarding privilege issues	.40	304.00
04/08/19	ASH	Correspondence w/Adversary to all counsel regarding 502(d) order	.30	228.00
04/08/19	ASH	Analysis of Correspondence from Curtis Mallet; Holland & Knight and EBW regarding procedures regarding privileged documents	.10	76.00
04/08/19	EBW	Telephone Call(s) Beechwood - teleconference with A. Silverstein and potential expert witness. (EBW portion).	.60	459.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 112

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/08/19	EBW	Correspondence Beechwood - correspondence with potential expert witness.	.20	153.00
04/08/19	EBW	Conference(s) In Office Beechwood - conference at Platinum's office with Receivership Team regarding discovery issues.	1.00	765.00
04/08/19	EBW	Correspondence Beechwood - correspondence with adversaries regarding document production and privilege issues.	.60	459.00
04/08/19	EBW	Telephone Call(s) Beechwood - teleconference with PPVA and Bodner group regarding privilege issues.	.40	306.00
04/08/19	EBW	Correspondence Beechwood - correspondence with document vendor.	.40	306.00
04/08/19	EBW	Analysis of Legal Papers Beechwood - analysis of legal issues.	2.10	1,606.50
04/08/19	WMM	Legal services/Client Participate in discovery meeting in Platinum offices with team.	1.00	795.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 113

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/08/19	WMM	Legal services/Legal Papers Communications concerning 502d Order and analyze same.	1.50	1,192.50
04/08/19	WMM	Legal services/Legal Papers Communications concerning decision on Beechwood Bermuda Investment Holdings and analyze same.	.70	556.50
04/09/19	CMO	Analysis of Resp to disc. device Examine document folders produced by CNO	1.70	501.50
04/09/19	ASH	Correspondence w/Adversary to all counsel regarding document productions; analyze background documents regarding same	2.10	1,596.00
04/09/19	ASH	Analysis of Subpoena Review draft subpoena	.20	152.00
04/09/19	ASH	Correspondence re: Subpoena To counsel for PPVA and Brent Weisenberg regarding subpoena	.30	228.00
04/09/19	ASH	Examine Documents executed 502(d) counterparts; e-mails regarding same	.10	76.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 114

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/09/19	ASH	Examine Documents exhibit containing list of all search terms previously used on Global Relay database; review background materials regarding same	.60	456.00
04/09/19	EBW	Legal Research Beechwood - review of legal research regarding amendments.	.30	229.50
04/09/19	EBW	Correspondence Beechwood - correspondence with vendor; adversaries and PPVA regarding discovery issues.	.40	306.00
04/09/19	EBW	Correspondence Beechwood - correspondence with receivership team regarding subpoena issues.	.20	153.00
04/09/19	EBW	Analysis of Legal Papers Beechwood - review of pleadings.	1.60	1,224.00
04/09/19	GSL	Pleadings Prepared request for issuance of summons - BBIHL	.40	118.00
04/09/19	GSL	Analysis/Strategy Updated adversary email list	.20	59.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 115

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/09/19	GSL	Analysis/Strategy Summary of document production for email to adversaries	4.40	1,298.00
04/09/19	GSL	Analysis/Strategy Research on joinder of parties	2.60	767.00
04/09/19	GSL	Conference(s) In Office Meeting with EBW and ASH - re document production plan	.40	118.00
04/09/19	WMM	Legal services/Legal Papers Reviewing documents submitted to potential expert witness	1.80	1,431.00
04/09/19	WMM	Legal services/Legal Papers Review draft summons to BBIH and communications concerning same.	.50	397.50
04/09/19	WMM	Legal services/Legal Papers Analyzing legal research concerning amending complaint to include third party defendants.	.70	556.50
04/09/19	WMM	Legal services/Legal Papers Communications concerning proposed joint subpoena	.50	397.50
04/09/19	WMM	Legal services/Legal Papers Reviewing summary of production.	.80	636.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 116

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/09/19	WMM	Legal services/Legal Papers Analyzing PPVA motion papers and opposition.	1.50	1,192.50
04/10/19	CMO	Analysis of Resp to disc. device Check initial external drive back ups of CNO productions	.90	265.50
04/10/19	ASH	Review/correct Legal Papers Exhibits to correspondence to opposing counsel regarding electronic discovery document productions	.20	152.00
04/10/19	ASH	Memorandum to CoCounsel - Other To EBW regarding issues regarding discovery issues	.30	228.00
04/10/19	ASH	Analysis of Complaint Final Amended Complaint	.60	456.00
04/10/19	ASH	Analysis of Subpoena Subpoena to CNO from SEC	.10	76.00
04/10/19	ASH	Review/correct Correspondence current draft regarding summary of proposed document production	.20	152.00
04/10/19	ASH	Analysis of Correspondence extensive correspondence from counsel for plaintiffs; defendants and PPVA regarding discovery issues	.20	152.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 117

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/10/19	ASH	Telephone Call(s) w/CoCounsel - Other With counsel for the JOLs of PPVA regarding issues relating to joint e-mail production through Relativity workspaces	.30	228.00
04/10/19	EBW	Telephone Call(s) Beechwood - teleconference with A. Halpern and counsel for PPVA regarding privilege issues.	.40	306.00
04/10/19	EBW	Correspondence Beechwood - preparation of correspondence to all parties regarding document production.	.40	306.00
04/10/19	EBW	Correspondence Beechwood - correspondence with other parties and receivership team regarding case scheduling issues.	.40	306.00
04/10/19	EBW	Preparation of Legal Papers Beechwood - attention to issuance of summons.	.20	153.00
04/10/19	EBW	Analysis of Legal Papers Beechwood - analysis of pleadings and claims.	2.20	1,683.00
04/10/19	GSL	Pacer-Docket Check Filed request for issuance of summons with JKH	.30	88.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 118

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/10/19	GSL	Analysis/Strategy Input changes to summary of document production plan	.90	265.50
04/10/19	GSL	Analysis/Strategy Continued preparing chart - causes of action in Amended Complaint	.80	236.00
04/10/19	JKH	Filing Papers at Court Beechwood - Preparing and filing Request for Summons for BBIH	.40	118.00
04/10/19	JKH	Review Documents Beechwood - reviewing stip and creating chart of signatories	.40	118.00
04/10/19	JKH	Review Documents Beechwood - reviewing emails with attached signature pages and organizing accordingly	.20	59.00
04/10/19	WMM	Legal services/Court (motion) Communications concerning proposed schedule for motions.	.70	556.50
04/10/19	WMM	Legal services/Legal Papers Communications concerning subpoena	.50	397.50
04/10/19	WMM	Legal services/Legal Papers Analysis of search terms in Schedule and communications concerning same.	.80	636.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 119

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/10/19	WMM	Legal services/Legal Papers Communications concerning Curtis Mallet privilege claim and analysis of same.	1.50	1,192.50
04/11/19	ASH	Examine Documents Subpoenas; e-mail to EBW regarding same	.40	304.00
04/11/19	ASH	Preparation of Legal Papers exhibits to letter to all counsel regarding discovery	1.70	1,292.00
04/11/19	ASH	Review/correct Correspondence to all counsel regarding electronic discovery	.90	684.00
04/11/19	ASH	Telephone Call(s) w/CoCounsel - Other With Sheila Shen and EBW regarding electronic discovery	.30	228.00
04/11/19	ASH	Examine Documents Index of materials sent to Iron Mountain	.10	76.00
04/11/19	ASH	Analysis of Court Decision Judge Rakoff's decision on motion to dismiss the PPVA Complaint	.60	456.00
04/11/19	EBW	Telephone Call(s) Beechwood - teleconference with PPVA counsel regarding discovery.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 120

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/11/19	EBW	Correspondence Beechwood - correspondence with other parties regarding discovery.	2.20	1,683.00
04/11/19	EBW	Telephone Call(s) Beechwood - joint interest call with counsel for P. Poteat and Receiver.	.30	229.50
04/11/19	EBW	Analysis of Legal Papers Beechwood - attention to filing issues.	.20	153.00
04/11/19	EBW	Analysis of Legal Papers Beechwood - analysis of Judge Rakoff's decision on motions to dismiss as to Trott.	1.70	1,300.50
04/11/19	GSL	Analysis/Strategy Continued preparing chart - causes of action in Amended Complaint	3.20	944.00
04/11/19	GSL	Pacer-Docket Check PACER review - deficient filing notice	.50	147.50
04/11/19	JKH	Review Documents Beechwood - reviewing recent filed documents and preparing email regarding same	.40	118.00
04/11/19	JKH	Review Documents Beechwood - reviewing consolidated docket order in regard to returned summons	.20	59.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 121

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/11/19	WMM	Legal services/Legal Papers Analyze proposed response to Curtis Mallet letter and our draft response; communications concering same.	.60	477.00
04/11/19	WMM	Legal services/Legal Papers Receive and analyze new court filings.	.70	556.50
04/11/19	WMM	Legal services/Legal Papers Receive and analyze Judge Rakoff's Opinion in "Bottom Line Order."	.90	715.50
04/11/19	WMM	Legal services/Legal Papers Communications concerning summary of production and privilege filters.	.60	477.00
04/12/19	CMO	Analysis of Resp to disc. device Re: setting up review of defendants production	1.90	560.50
04/12/19	ASH	Conference(s) w/ CoCounsel - Other With ACS and EBW regarding discovery	.20	152.00
04/12/19	ASH	Telephone Call(s) w/CoCounsel - Other Sheila Shen regarding privilege filters	.10	76.00
04/12/19	ASH	Correspondence w/CoCounsel - Other Warren Gluck regarding issues relating to document productions	.20	152.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 122

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/12/19	ASH	Correspondence w/Adversary Gabe Hertzberg regarding privilege Bodner Group's requested exclusions from document production	.20	152.00
04/12/19	ASH	Telephone Call(s) w/CoCounsel - Other with Kevin Melfi regarding document production and privilege filters	.40	304.00
04/12/19	ASH	Telephone Call(s) w/CoCounsel - Other wiith Kevin Melfi and Chris Sharp regarding productions of electronic files	.30	228.00
04/12/19	ASH	Correspondence w/Adversary Revise correspondence to all counsel regarding email production and privilege filters	1.20	912.00
04/12/19	ASH	Correspondence w/CoCounsel - Other Kevin Melfi and Chris Sharp of Strategic regarding document counts	.30	228.00
04/12/19	EBW	Telephone Call(s) Beechwood - teleconference with W. Gluck regarding discovery.	.20	153.00
04/12/19	EBW	Conference(s) In Office Beechwood - conference with A. Silverstein and A. Halpern regarding productions issues.	.40	306.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 123

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/12/19	EBW	Telephone Call(s) Beechwood - teleconference with Court regarding scheduling issues.	.30	229.50
04/12/19	EBW	Correspondence Beechwood - correspondence with parties regarding discovery issues.	.20	153.00
04/12/19	EBW	Analysis of Legal Papers Beechwood - analysis of motion to dismiss orders.	.40	306.00
04/12/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and EBW re discovery in arbitration and Beechwood	.50	432.50
04/12/19	WMM	Legal services/Legal Papers Communications concerning scheduling motion dates with various counsel.	.80	636.00
04/12/19	WMM	Legal services/Legal Papers Reviewing PPVA Second Amended Complaint and Exhibits.	1.70	1,351.50
04/13/19	ASH	Examine Documents test out privileged document searches requested by various opposing counsel and review search hit results from opposing counsel	1.60	1,216.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 124

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/13/19	ASH	Correspondence w/CoCounsel - Other representatives of Holland & Knight regarding issues relating to privilege searches	.30	228.00
04/13/19	ASH	Correspondence w/CoCounsel - Other To Kevin Melfi regarding searches and search terms	.80	608.00
04/14/19	ASH	Correspondence w/CoCounsel - Other Kevin Melfi and Chris Sharp of Strategic Legal regarding privilege filters and possible conference call with opposing counsel	.30	228.00
04/14/19	EBW	Correspondence Beechwood - correspondence regarding discovery.	.20	153.00
04/15/19	AW	Filing Papers at Court Filed Amended Summons SDNY	.70	206.50
04/15/19	AW	Obtaining Copies of Court Records Reviewed docket for service re: summons & complaint a waivers	2.90	855.50
04/15/19	ASH	Analysis of Federal court summons Request for summons	.10	76.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 125

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/15/19	ASH	Analysis of Correspondence Gabriel Hertzberg regarding issues relating to document productions	.10	76.00
04/15/19	ASH	Correspondence w/CoCounsel - Other To Sheila Shen and Warren Gluck regarding privilege filters; review documents regarding same	.10	76.00
04/15/19	ASH	Correspondence w/CoCounsel - Other Kevin Melfi regarding privilege filter searches (5)	.40	304.00
04/15/19	ASH	Analysis of Legal Papers Review confidentiality agreements in various matters; e-mails to Brent Weisenberg regarding same	.40	304.00
04/15/19	ASH	Review/correct Legal Papers Description of privilege filters	.60	456.00
04/15/19	ASH	Telephone Call(s) w/CoCounsel - Other Kevin Melfi regarding privilege filters	.20	152.00
04/15/19	ASH	Analysis of Legal Papers Recent court filings	.20	152.00
04/15/19	EBW	Telephone Call(s) Beechwood - teleconference with court regarding scheduling on CNO complaint.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 126

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/15/19	EBW	Telephone Call(s) Beechwood - teleconferences with B. Weisenberg regarding scheduling and legal research.	.30	229.50
04/15/19	GSL	Analysis/Strategy Research on procedure for Amended Summons	2.00	590.00
04/15/19	GSL	Conference(s) In Office Meeting with ACS and ASH to discuss research assignment - re agency law	.40	118.00
04/15/19	GSL	Analysis/Strategy Prepared request for issuance of summons - BCLIC and WNIC	.20	59.00
04/15/19	JKH	Research Researching location of BBIH and preparing email regarding process for service of summons on Secretary of State	.80	236.00
04/16/19	CMO	Review file re Resp to disc. device Distribution of external drives of CNO Defendants' productions	.90	265.50
04/16/19	AW	Filing Papers at Court Proof sevice list of docs Efiled.	1.30	383.50
04/16/19	ASH	Analysis of Correspondence From Holland & Knight; Curtis Mallet; DLA regarding discovery disputes	.30	228.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 127

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/16/19	ASH	Correspondence w/CoCounsel - Other To Kevin Melfi and regarding issues relating to document productions (5)	.70	532.00
04/16/19	ASH	Correspondence w/CoCounsel - Other to representatives of Holland & Knight regarding issues relating to document productions and privilege logs	.50	380.00
04/16/19	ASH	Examine Documents Documentation from Strategic regarding numerous of documents from privilege filters	.30	228.00
04/16/19	ASH	Correspondence w/CoCounsel - Other to all counsel regarding production to be made by the Receiver and the Joint Liquidators of PPVA	.70	532.00
04/16/19	ASH	Examine Documents Statement of Work from Strategic Legal; arrange for execution of same; e-mail to Strategic Legal and counsel for JOLs regarding same	.20	152.00
04/16/19	ASH	Correspondence w/Adversary To John Aerni regarding issues relating to timing of document productions; review background documents regarding same	.20	152.00
04/16/19	ASH	Preparation of Legal Papers New summons; arrange for service of summons	.20	152.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 128

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/16/19	ASH	Analysis of Legal Papers Holland & Knight's revisions to proposed agreement from Curtis Mallet regarding privileged documents	.20	152.00
04/16/19	EBW	Correspondence Beechwood - correspondence with parties regarding discovery issues.	.40	306.00
04/16/19	GSL	Analysis/Strategy Review of original affidavits of service of process for filing with the court	.60	177.00
04/16/19	GSL	Service of Legal Papers BBIHL - correspondence with process server/prep for service of process with the secretary of state	.30	88.50
04/16/19	GSL	Pacer-Docket Check Remedying deficient request for issuance of summons	.70	206.50
04/16/19	WMM	Preparation of Witness for Trial Numerous communications with team and counsel scheduling call for new dates and call with court; and concerning initial production approach.	1.10	874.50
04/17/19	AW	Filing Papers at Court Filed Services & Waiver SDNY	1.90	560.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 129

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/17/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with ACS; Chris Sharp and Roger Smith of Strategic Legal and opposing counsel regarding documents	.60	456.00
04/17/19	ASH	Examine Documents Materials from JKH to prepare for conference call with court	.30	228.00
04/17/19	ASH	Correspondence w/CoCounsel - Other with Chris Sharp of Strategic confirming parameters of production	.40	304.00
04/17/19	EBW	Telephone Call(s) Beechwood - teleconferences with adversaries regarding discovery.	.30	229.50
04/17/19	EBW	Correspondence Beechwood - correspondence with adversaries regarding discovery.	.60	459.00
04/17/19	GSL	Analysis/Strategy Continued research on agency law	1.80	531.00
04/17/19	GSL	Analysis/Strategy Prepared summary of research on agency law	1.90	560.50
04/17/19	JKH	Review Documents Beechwood - reviewing complaint and document requests re specific defendants	.60	177.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 130

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/17/19	JKH	Diary & Docket Beechwood - Reviewing scheduling order and calendaring multiple deadlines re motions to dismiss third party complaint and amended complaint	.20	59.00
04/17/19	JKH	Analyze Documents Reviewing PPCO document request to Beechwood and response; flagging and creating chart of same	.80	236.00
04/17/19	WMM	Legal services/Legal Papers Numerous communications concerning discovery issues and disputes; reviewing discovery requests and chart concerning same; and scheduling conference call for full discussion and call to the court.	1.80	1,431.00
04/17/19	WMM	Legal services/Legal Papers Analyzing scheduling Order on motions as to TPC and the FAC.	.50	397.50
04/18/19	CMO	Analysis of Resp to disc. device W/ASH re: Ship production	.20	59.00
04/18/19	CMO	Analysis of Correspondence Estimate re: Strategic hosting of CNO_CSL production volumes	.20	59.00
04/18/19	AW	Obtaining Copies of Court Records Service to process server	.90	265.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 131

October 17, 2019  
BILL NO. 205506

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/18/19 ASH	Conference(s) w/ CoCounsel - Other Meeting with Receiver; ACS and EBW regarding status of matters	1.00	760.00
04/18/19 ASH	Correspondence w/CoCounsel - Other Numerous to opposing counsel including Gabe Hertzberg; Saul Feder; Sheila Shen and other opposing counsel regarding issues relating to opposing counsel workpapers	.50	380.00
04/18/19 ASH	Review/correct Legal Papers Instructions for Strategic for privilege filters	.80	608.00
04/18/19 ASH	Correspondence w/CoCounsel - Other to Chris Sharp regarding setting up opposing counsel workspaces	.40	304.00
04/18/19 ASH	Telephone Call(s) w/Adversary Meet and confer call with Warren Gluck; Gabriel Hertzberg and numerous other opposing counsel regarding discovery schedule	.30	228.00
04/18/19 ASH	Examine Documents Documents produced by SHIP and Fuzion	.30	228.00
04/18/19 EBW	Conference(s) In Office Beechwood - receivership team status and strategy meeting.	.90	688.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 132

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/18/19	EBW	Correspondence Beechwood - correspondence with various parties regarding discovery issues.	.40	306.00
04/18/19	EBW	Telephone Call(s) Beechwood - participation in multi-party teleconference and subsequent teleconference with court regarding discovery and scheduling issues.	.90	688.50
04/18/19	JKH	Review Documents Beechwood - reviewing and organizing signature pages for Consolidated Order	.20	59.00
04/18/19	WMM	Attendance at Conference Prepare for and participate in conference call with all counsel and call with Court concerning dates going forward.	.90	715.50
04/19/19	ASH	Examine Documents Documents produced by SHIP	.30	228.00
04/19/19	ASH	Review/correct Legal Papers Revised privilege filter lists based upon changes received from opposing counsel and comments from Strategic	.60	456.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 133

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/19/19	ASH	Correspondence w/Adversary To Gabriel Hertzberg and Saul Feder regarding changes to Bodner Group's privilege filters; to all counsel regarding changes to privilege filters and revised summary of search terms	.30	228.00
04/19/19	ASH	Examine Documents Analyses from Kevin Melfi and search terms from opposing counsel regarding different procedures for running privilege filters; e-mails to Kevin Melfi regarding same	.40	304.00
04/19/19	ASH	Correspondence w/CoCounsel - Other numerous to Kevin Melfi and Christopher Sharp regarding opposing counsel workspaces; document scanning and privilege filters	.20	152.00
04/19/19	EBW	Correspondence Beechwood - correspondence with other parties and court regarding scheduling and discovery matters.	.40	306.00
04/19/19	JKH	Diary & Docket Beechwood - reviewing email with new schedule of multiple deadlines regarding responses and discovery; calendaring deadlines of same	.70	206.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 134

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/19/19	WMM	Legal services/Legal Papers Communications concerning discovery issues with Court; briefing schedule for same; and initial discovery.	.50	397.50
04/20/19	ASH	Review/correct Legal Papers Revise summary of parameters of email production	.50	380.00
04/22/19	ASH	Correspondence w/CoCounsel - Other To Chris Sharp and Kevin Melfi of Strategic regarding search term lists	.20	152.00
04/22/19	JKH	Analyze Documents Beechwood - reviewing Motions to Dismiss and related documents in PPVA case	.40	118.00
04/22/19	JKH	Analysis of Complaint Beechwood - Review of BCLIC and WNIC Third Party Complaint	1.30	383.50
04/22/19	WMM	Legal services/Legal Papers Reviewing CNO motion to dismiss to analyze securities claim opposition.	1.50	1,192.50
04/22/19	WMM	Legal services/Legal Papers Attention to Beechwood status as to issue of production of SEC documents; and analyze same for upcoming motion.	1.50	1,192.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 135

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/23/19	CMO	Analysis of Resp to disc. device Production load files review	1.90	560.50
04/23/19	ASH	Examine Documents Documentation regarding privilege filters from Kevin Melfi	.20	152.00
04/23/19	ASH	Analysis of Legal Papers Review recent court filings in all three consolidated actions	.30	228.00
04/23/19	GSL	Analysis/Strategy Research - re motion to confirm arbitration award	1.50	442.50
04/23/19	JKH	Review Documents Beechwood - reviewing and organizing all Motions to Dismiss and related documents in PPVA case; sending email regarding same	1.30	383.50
04/23/19	WMM	Legal services/Legal Papers Communications concerning scheduling; CNO motion to confirm arbitration award; and today's court filings; and analyzing same.	3.70	2,941.50
04/23/19	WMM	Legal services/Settlement Communications concerning settlement discussions	.50	397.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 136

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/23/19	WMM	Legal services/Legal Papers Analyze Judge Rakoff opinion concerning "Bottom Line Order."	.80	636.00
04/24/19	GSL	Analysis/Strategy Continued research - re motion to confirm arbitration award	2.10	619.50
04/24/19	WMM	Legal services/Settlement Prepare for and participate in settlement conference with counsel for Beechwood; and communications concerning same.	1.50	1,192.50
04/24/19	WMM	Legal services/Legal Papers Continue analysis of CNO motion to confirm; communications about same; and review Court Order concerning same.	2.00	1,590.00
04/25/19	CMO	Analysis of Resp to disc. device Review Strategic Relativity hosting re: opposing parties productions	.90	265.50
04/25/19	CMO	Analysis of Resp to disc. device Re: load files for Ship production	1.90	560.50
04/25/19	EBW	Analysis of Legal Papers Beechwood - analysis of recent pleadings.	2.30	1,759.50
04/25/19	WMM	Legal services/Settlement Communications concerning strategy with Beechwood settlement discussions	1.80	1,431.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 137

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/26/19	CMO	Analysis of Resp to disc. device Review of Ship production load files	2.30	678.50
04/26/19	EBW	Correspondence Beechwood - correspondence with document vendor regarding production.	.20	153.00
04/26/19	EBW	Correspondence Beechwood - correspondence with litigation team regarding strategy issues.	.20	153.00
04/26/19	EBW	Analysis of Legal Papers Beechwood - review of recent pleadings and filings.	2.70	2,065.50
04/26/19	JKH	Analysis of Complaint Beechwood - additional review of third party complaint	.40	118.00
04/26/19	WMM	Legal services/Settlement Communications concerning settlement discussions; scheduling conference for same; and attention to trial status.	.70	556.50
04/28/19	ASH	Memorandum to CoCounsel - Other To MLC; EBW; WMM and GSL regarding issues relating to tasks to be done	1.20	912.00
04/28/19	ASH	Correspondence w/Adversary to all counsel requesting signed copies of the Rule 502(d) Stipulation	.20	152.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 138

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/28/19	ASH	Correspondence w/Adversary To Jeff Alexander; Michael Eggenberger and Eric Creizman regarding request to change notification list; to all counsel regarding same	.20	152.00
04/29/19	CMO	Preparation of e-mail(s) With James O'Neil (DLA Piper) re: Ship production	.20	59.00
04/29/19	CMO	Analysis of Resp to disc. device Re: Relativity hosting of other production load files	.30	88.50
04/29/19	ASH	Examine Documents final documentation of privilege filters from Strategic	.70	532.00
04/29/19	ASH	Correspondence w/CoCounsel - Other To Kevin Melfi and Christopher Sharp of Strategic regarding final privilege filters	.20	152.00
04/29/19	ASH	Analysis of Stipulation Review numerous executed copies of stipulations; prepare numerous e-mails to EBW; GSL and JKH regarding same	.20	152.00
04/29/19	ASH	Review/correct Court from William Moran to Court regarding Beechwood's refusal to produce documents	.30	228.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 139

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/29/19	ASH	Analysis of Brief for motion Drafts and final copies of papers filed by Senior Health Insurance of Pennsylvania in support of motion to compel the Beechwood parties to produce documents; papers filed by other parties on motion	.30	228.00
04/29/19	ASH	Examine Documents Review documents; correspondence and notes regarding productions to the SEC and correspondence and notes regarding same	.40	304.00
04/29/19	ASH	Examine Documents Summaries of document productions; CDs from prior productions	.20	152.00
04/29/19	EBW	Analysis of Legal Papers Beechwood - review of pending issues.	.40	306.00
04/29/19	EBW	Conference(s) In Office Beechwood - litigation team status and strategy meeting. (EBW portion).	1.00	765.00
04/29/19	EBW	Preparation for Conference Beechwood - preparation for teleconference with court.	.20	153.00
04/29/19	EBW	Telephone Call(s) Beechwood - teleconference with court regarding discovery filing.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 140

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/29/19	EBW	Preparation of Legal Papers Beechwood - review and prepare "joinder" in discovery filing.	.90	688.50
04/29/19	EBW	Telephone Call(s) Beechwood - teleconference with PPVA regarding items of mutual interest.	.20	153.00
04/29/19	GSL	Conference(s) In Office Beechwood-litigation meeting with Goldin and Platinum	1.00	295.00
04/29/19	GSL	Pacer-Docket Check Reviewed docket and prepared Notice of Appearance for WMM - re SHIP's motion to Compel Beechwood Defendants to produce their objections; responses; and production to the SEC's Subpoena	.90	265.50
04/29/19	GSL	Filing Papers at Court Filed letter joining SHIP's motion to Compel Beechwood to produce their objections; responses; and production to the SEC's Subpoena on the docket	1.00	295.00
04/29/19	JKH	Review Documents Beechwood - reviewing multiple emails with attached signature pages for 502 order; organizing and updating chart	.50	147.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 141

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/29/19	JKH	Draft/revise Beechwood - editing document production chart for all Beechwood productions	.60	177.00
04/29/19	WMM	Legal services/Legal Papers Prepare for and participate in team meeting; reviewing GSL documents from same; communications scheduling settlement conference and strategy for same.	1.00	795.00
04/29/19	WMM	Conference(s) w/ Adversary Prepare for and participate in conference call concerning motion for Beechwood production of SEC materials.	.50	397.50
04/29/19	WMM	Preparation of Legal Papers Analyze motion for Beechwood production of SEC materials; prepare motion to join same; communications concerning same and revise same.	4.50	3,577.50
04/29/19	WMM	Preparation of Legal Papers Communications concerning WMM notice of appearance; review and finalize same.	.50	397.50
04/30/19	JSF	Examine Documents Status of Retention of Experts	.40	322.00
04/30/19	ASH	Telephone Call(s) w/CoCounsel - Other With Kevin Melfi; Sheila Shen; et al. regarding privilege filters (3)	.40	304.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 142

October 17, 2019  
BILL NO. 205506

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/30/19 ASH	Analysis of Legal Papers Analyze revised privilege filters and correspondence from counsel for PPVA regarding same	.20	152.00
04/30/19 ASH	Correspondence w/CoCounsel - Other Numerous to Kevin Melfi; Christopher Sharp and Sheila Shen regarding privilege filters and related issues	.20	152.00
04/30/19 ASH	Examine Documents Analyze lists and background documents regarding issues relating to 502(d) Stipulation	.20	152.00
04/30/19 ASH	Telephone Call(s) w/Adversary Telephone call with counsel for Senior Health Insurance Company of Pennsylvania and Fuzion regarding 502(d) Order	.10	76.00
04/30/19 EBW	Preparation for Conference Beechwood - preparation for teleconference with Beechwood's counsel.	.20	153.00
04/30/19 EBW	Telephone Call(s) Beechwood - teleconference with Beechwood's counsel and W. Moran.	.40	306.00
04/30/19 EBW	Correspondence Beechwood - correspondence with parties regarding document production	.60	459.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 143

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/30/19	EBW	Telephone Call(s) Beechwood - teleconference with PPVA and Strategic regarding document production.	.20	153.00
04/30/19	EBW	Conference(s) In Office Litigation - conference with Receiver and A. Silverstein regarding litigation strategy. (EBW portion)	.40	306.00
04/30/19	GSL	Correspondence w/Adversary Made calls to counsel regarding Stip and 502(d) order	.60	177.00
04/30/19	JKH	Review Documents Beechwood - reviewing; organizing and compiling additional signature pages for 502 order and updating chart regarding same	.70	206.50
04/30/19	JKH	Telephone Call(s) Beechwood - follow-up telephone calls for non-responsive parties re 502 Order and updating chart regarding same	1.20	354.00
04/30/19	JKH	Prepare Legal Papers Beechwood - preparing service of letter motion	.30	88.50
04/30/19	WMM	Legal services/Settlement Prepare for and participate in settlement conference with counsel for Beechwood and EBW; and communications concerning same.	1.50	1,192.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 144

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/19	ASH	Telephone Call(s) w/Court Conference call with Sheila Shen and Judge Rakoff's law clerk regarding Rule 502(d) Stipulation	.10	76.00
05/01/19	ASH	Correspondence w/Adversary to numerous opposing counsel regarding 502(d) Order (11)	.70	532.00
05/01/19	ASH	Telephone Call(s) w/Adversary Telephone calls with counsel for BRe BCLIC Primary; BRe BCLIC Sub; BRe WNIC 2013 LTC Primary and BRe WNIC 2013 Sub regarding 502(d) Stipulation and factual matters	.70	532.00
05/01/19	ASH	Telephone Call(s) w/Adversary Telephone calls with Daniel Tepper of Wolf Halderstein; Edward Canter of Proskauer; Ken Zitter; Tovia Jakubowitz and others regarding Rule 502(d) Stipulation	.20	152.00
05/01/19	ASH	Telephone Call(s) w/CoCounsel - Other With Sheila Shen regarding 502(d) Stipulation	.20	152.00
05/01/19	ASH	Preparation of Legal Papers Prepare chart of experts; review documents regarding same	.70	532.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 145

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/19	ASH	Examine Documents Documents produced by BRe BCLIC Primary; BRe BCLIC Sub; BRe WNIC 2013 LTC Primary and BRe WNIC 2013 Sub	1.10	836.00
05/01/19	ASH	Review/correct Legal Papers Affidavit of Service on Beechwood Bermuda Investment Holdings; LTD.	.10	76.00
05/01/19	EBW	Correspondence Beechwood - correspondence with multiple parties regarding discovery.	.80	612.00
05/01/19	EBW	Analysis of Legal Papers Beechwood - review of pleadings.	2.50	1,912.50
05/01/19	GSL	Analysis/Strategy Research for service of Amended Summons	.80	236.00
05/01/19	GSL	Service of Summons and Complaint Correspondence with process server for service of Amended Summons	.50	147.50
05/01/19	GSL	Prepare Affidavit Preparation of affidavit for service on BBIHL (new party in Amended Complaint)	1.30	383.50
05/01/19	JKH	Pacer-Docket Check Beechwood - reviewing docket for hearings and telephone conferences	.70	206.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 146

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/19	JKH	Review Documents Beechwood - reviewing additional emails with signature pages organizing and updating chart	.80	236.00
05/01/19	JKH	Review Documents Beechwood - reviewing and compiling all signature pages for final executed 502(d) stipulation	.30	88.50
05/01/19	JKH	Review Documents Beechwood - reviewing email re telephone conference on 502(d) stipulation; calendaring same for all parties	.20	59.00
05/01/19	WMM	Legal services/Legal Papers Communications concerning facts from criminal trial and reviewing same	.50	397.50
05/02/19	CMO	Review file re Resp to disc. device Arrange for replacement of data files in CNO production load files	.20	59.00
05/02/19	ASH	Telephone Call(s) w/Court conference call with Judge Rakoff's clerk and numerous counsel regarding entry of Rule 502(d) Order	.30	228.00
05/02/19	ASH	Conference(s) w/ CoCounsel - Other with EBW to prepare for upcoming conference call with Court	.20	152.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 147

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/02/19	ASH	Correspondence w/Court to Ben Gifford (Judge Rakoff's law clerk) submitting both versions of Rule 502(d) Order	.70	532.00
05/02/19	ASH	Correspondence w/CoCounsel - Other To Paul Poteat regarding privilege filters for documents	.60	456.00
05/02/19	ASH	Correspondence w/Adversary to James Berg and Dan Schleifstein regarding updated Rule 502(d) Order	.20	152.00
05/02/19	ASH	Telephone Call(s) w/Adversary With Daniel Schleifstein regarding 502(d) and related issues	.30	228.00
05/02/19	ASH	Analysis of Correspondence Review two versions of language from Dan Schleifstein with new language for signature qualification	.10	76.00
05/02/19	ASH	Telephone Call(s) w/CoCounsel - Other With ACS; EBW and Brent Weisenberg regarding document production	.30	228.00
05/02/19	ASH	Analysis of Legal Papers Judge Rakoff's Rules and protective and 502(d) Orders	.40	304.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 148

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/02/19	ASH	Examine Documents Prepare outline for conference call with Judge Rakoff's chambers	.40	304.00
05/02/19	EBW	Preparation for Conference Beechwood - attention to privilege issues and preparation for court call.	.80	612.00
05/02/19	EBW	Telephone Call(s) Beechwood - teleconference with court regarding 502(d).	.40	306.00
05/02/19	EBW	Conference(s) In Office Beechwood - conference with receivership team regarding production and review issues.	.30	229.50
05/02/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon EBW ; ASH and B Weisenberg re discovery issues overlapping in Beechwood action and arbitration	.30	259.50
05/02/19	GSL	Prepare Affidavit Continued preapring affidavit for service on BBIHL	.70	206.50
05/02/19	GSL	Conference(s) In Office Conference in office - re upload and review of document productions to the receiver	.30	88.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 149

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/02/19	JKH	Conference(s) in Office Beechwood - Conference regarding Beechwood production	.40	118.00
05/02/19	JKH	Review Documents Reviewing document productions in preparation for meeting	.60	177.00
05/03/19	CMO	Review file re Resp to disc. device Prepare additional flash drives for Ship production	.30	88.50
05/03/19	ASH	Telephone Call(s) w/CoCounsel - Other With Brent Weisenberg; Paul Poteat and EBW regarding privilege searches for document production	.40	304.00
05/03/19	ASH	Examine Documents Review documents regarding possible privilege filters for production to non-party	.50	380.00
05/03/19	ASH	Memo-File With Sheila Shen regarding opposing counsel workspaces	.20	152.00
05/03/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with Karthik Bhavaraju; Alois Chakabva; ACS; EBW and GSL regarding strategy for analyzing electronically stored information for use in preparing case	.70	532.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 150

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/03/19	ASH	Examine Documents List of search terms from Alois Chakabva	.40	304.00
05/03/19	ASH	Telephone Call(s) w/CoCounsel - Other With Chris Sharp and Kevin Melfi regarding document productions	.30	228.00
05/03/19	EBW	Conference(s) In Office Beechwood - conference with litigation team regarding document review. (EBW portion).	1.00	765.00
05/03/19	EBW	Telephone Call(s) Investors - teleconference with B. Weisenberg; P. Poteat and A. Halpern regarding document request response.	.50	382.50
05/03/19	EBW	Attend Court Beechwood - attendance at hearing on attorneys' fees advancement request.	2.50	1,912.50
05/03/19	EBW	Analysis of Legal Papers Beechwood - attention to pleadings and related legal research.	1.50	1,147.50
05/03/19	ACS	Conference(s) w/ CoCounsel - Other Meeting on document review in Beechwood and auditor arbitration	.70	605.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 151

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/03/19	GSL	Conference(s) In Office Meeting with ASH; EBW; Goldin and Platinum to discuss search terms and document review	1.00	295.00
05/03/19	GSL	Analysis/Strategy Review of objections to the Receiver's Production Request	.50	147.50
05/03/19	GSL	Analysis/Strategy Review of Rakoff's 4/11/19 Orders in SHIP and PPVA actions - re chart summarizing CoA in FAC	2.60	767.00
05/03/19	WMM	Attendance at Conference Attend team meeting concering document review.	1.00	795.00
05/03/19	WMM	Legal services/Settlement Communications concerning settlement efforts with Beechwood.	.50	397.50
05/04/19	ASH	Examine Documents Analyze documents regarding possible search terms to prepare for discovery and ultimate hearing; prepare list of search terms	1.30	988.00
05/05/19	GSL	Analysis/Strategy Continued preparing chart with elements of each CoA in FAC	1.50	442.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 152

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/06/19	CMO	Analysis of Resp to disc. device Send SHIP production to Relativity hosting vendor in order to obtain hosting estimate	.70	206.50
05/06/19	ASH	Correspondence w/CoCounsel - Other To Barbra Parlin; Sheila Shen and EBW regarding issues relating to discovery	.30	228.00
05/06/19	EBW	Correspondence Beechwood - correspondence with PPVA and document vendor regarding production and hosting issues.	.80	612.00
05/06/19	EBW	Correspondence Beechwood - correspondence with adversaries regarding withdrawal of motion to compel.	.20	153.00
05/06/19	EBW	Correspondence Beechwood - correspondence with receivership team regarding search terms.	.30	229.50
05/06/19	GSL	Analysis/Strategy Continued preparing chart on elements for each cause of action in FAC	3.90	1,150.50
05/06/19	GSL	Analysis/Strategy Additional review of responses/objections to the Receiver's ROGS/RFP	.50	147.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 153

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/06/19	GSL	Analysis/Strategy Prepared chart on individuals identified in answers to Receiver's interrogatories	1.00	295.00
05/06/19	WMM	Legal services/Legal Papers Communications concerning defendant Cassidy settlement proposal; communications concerning SHIP and Fuzion conference call with court; communications concerning chart summarizing causes of action and analyze same.	2.00	1,590.00
05/07/19	ASH	Telephone Call(s) w/CoCounsel - Other telephone call with Brent Weisenberg; EBW; GSL; Alois and Karthik regarding issues relating to search terms and document review	.30	228.00
05/07/19	ASH	Correspondence w/Adversary to Kevin Melfi and Chris Sharp regarding workspaces	.10	76.00
05/07/19	EBW	Telephone Call(s) Beechwood - participation in teleconference with court regarding withdrawal of motion to compel.	.30	229.50
05/07/19	EBW	Correspondence Beechwood - correspondence with counsel for PPVA regarding items of mutual concern.	.20	153.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 154

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/07/19	EBW	Correspondence Beechwood - correspondence with receivership team and vendor regarding document hosting and production issues.	.40	306.00
05/07/19	EBW	Telephone Call(s) Beechwood - teleconference with receivership team regarding email search terms.	.30	229.50
05/07/19	EBW	Analysis of Legal Papers Beechwood - review of pleadings; legal research and related documents; including production documents.	3.60	2,754.00
05/07/19	GSL	Analysis/Strategy Review of all initial disclosures in consolidated actions - re chart on individuals with knowledge	3.40	1,003.00
05/07/19	GSL	Analysis/Strategy Relativity document search	.80	236.00
05/07/19	GSL	Conference call(s) Call with Otterbourg; Platinum; Goldin - re document review	.30	88.50
05/07/19	JKH	Review Documents Beechwood - reviewing disclosure statements	.60	177.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 155

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/08/19	CMO	Analysis of Resp to disc. device W/ASH re: additional hosting	.30	88.50
05/08/19	CMO	Preparation of e-mail(s) W/Relativity hosting vendor	.20	59.00
05/08/19	ASH	Examine Documents analyze documentation and correspondence regarding structure of workspaces of opposing counsel workspaces	.30	228.00
05/08/19	ASH	Correspondence w/Adversary Barbra Parlin and Sheila Shen regarding documents produced	.10	76.00
05/08/19	EBW	Review Documents Beechwood - review of document productions for relevant documents.	2.80	2,142.00
05/08/19	GSL	Analysis/Strategy Review of search terms in preparation for call with Otterbourg; Platinum; Goldin - re document review	1.00	295.00
05/08/19	JKH	Review Documents Beechwood - reviewing emails enclosing document productions	.40	118.00
05/09/19	CMO	Analysis of Resp to disc. device Re: Additional production in	1.50	442.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 156

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/09/19	CMO	Preparation of e-mail(s) Prepare email to Relativity vendor re: hosting	.50	147.50
05/09/19	CMO	Analysis of Resp to disc. device Re: additonal hosting and follow up emails	.70	206.50
05/09/19	ASH	Telephone Call(s) w/CoCounsel - Other With Brent Weisenberg; Alois Chakabva; Karthik Bhavaraju and EBW regarding document review and search terms	.50	380.00
05/09/19	ASH	Examine Documents CNO and SHIP productions; e-mails to CMO and Strategic regarding same	.50	380.00
05/09/19	ASH	Correspondence w/CoCounsel - Other Sheila Shen and Barbra Parlin regarding discovery	.20	152.00
05/09/19	ASH	Preparation of Legal Papers Summary of document productions and structure	.30	228.00
05/09/19	EBW	Telephone Call(s) Beechwood - teleconference with Receivership team regarding search terms.	.50	382.50
05/09/19	EBW	Review Documents Beechwood - analysis of production documents and discovery issues.	1.90	1,453.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 157

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/09/19	EBW	Analysis of Legal Papers Beechwood - analysis of pleadings.	1.40	1,071.00
05/09/19	GSL	Conference call(s) Call with Otterbourg; Goldin; Platinum - re search terms for document review	.50	147.50
05/09/19	JKH	Conference call(s) Beechwood - group call regarding document review	.50	147.50
05/09/19	WMM	Legal services/Legal Papers Communicaitons concerning Beechwood production and reviewing same	.50	397.50
05/10/19	ASH	Conference(s) w/ CoCounsel - Other Brent Weisenberg; William Moran; Erik Weinick; Gabriela Leon and Jessica Hildebrandt regarding planning	1.10	836.00
05/10/19	EBW	Conference(s) In Office Beechwood - participation in strategy and status meeting. (EBW portion).	1.80	1,377.00
05/10/19	EBW	Correspondence Beechwood - correspondence with vendor and team regarding document review and production.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 158

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/10/19	GSL	Conference(s) In Office Meeting with Otterbourg; Platinum; Goldin -- re document review search terms	1.40	413.00
05/10/19	JKH	Conference(s) in Office Beechwood - conference regarding productions and next steps in litigation	1.60	472.00
05/10/19	JKH	Review Documents Beechwood - reviewing SHIP email and letter with document production	.30	88.50
05/10/19	WMM	Attendance at Conference Team meeting concerning status and document review; communications concerning take aways from meeting and review memo of same; communications concerning searches.	2.50	1,987.50
05/13/19	ASH	Analysis of Legal Papers Legal research regarding discovery issue	1.20	912.00
05/13/19	ASH	Telephone Call(s) w/CoCounsel - Other Conference call with Kevin Melfi; Christopher Sharp; Brent Weinenberg; EBW; GSL and JKH regarding search terms and folders	.40	304.00
05/13/19	EBW	Telephone Call(s) Beechwood - teleconference with P. Poteat; B. Weisenberg and T. Rogers regarding document search matters.	.70	535.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 159

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/13/19	EBW	Correspondence Beechwood - correspondence with counsel for PPVA regarding items of mutual interest.	.30	229.50
05/13/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for PPVA regarding items of mutual interest.	.30	229.50
05/13/19	EBW	Review Documents Beechwood - analysis of document review issues.	.80	612.00
05/13/19	EBW	Review Documents Beechwood - analysis of deposition issues.	.60	459.00
05/13/19	EBW	Telephone Call(s) Beechwood - teleconference with court and counsel regarding filing under seal.	.10	76.50
05/13/19	EBW	Telephone Call(s) Beechwood - teleconference with new counsel for trusts regarding entry into case.	.10	76.50
05/13/19	GSL	Analysis/Strategy Research re: Subpoenas	3.40	1,003.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 160

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/13/19	JKH	Conference call(s) Beechwood - conference call with strategic regarding document searches	.40	118.00
05/13/19	JKH	Document Review Beechwood - preparing searches for document review	1.20	354.00
05/13/19	JKH	Document Review Beechwood - creating searches in preparation for document review	3.20	944.00
05/13/19	JKH	Review Documents Beechwood - Reviewing Huberfeld Disclosures and responses	.20	59.00
05/13/19	WMM	Legal services/Legal Papers Communications concerning SHIP conference on filing; draft searches; review same and concerning discovery of Brady material.	1.00	795.00
05/14/19	ASH	Analysis of Opposing brief for motion Opposition to Motion to Dismiss filed by Liquidators of PPVA	.30	228.00
05/14/19	ASH	Review/correct Subpoena Subpoena to SHOT	.30	228.00
05/14/19	ASH	Analysis of Answer Answer of Wilmington Trust N.A. to the Second Amended Complaint in Trott action	.30	228.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 161

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/14/19	EBW	Analysis of Legal Papers Beechwood - analysis of SHIP's motion to dismiss.	.50	382.50
05/14/19	EBW	Analysis of Legal Papers Beechwood - analysis of PPVA's opposition to motion to dismiss.	.30	229.50
05/14/19	EBW	Correspondence Beechwood - correspondence with receivership team regarding potential court call regarding chapter 15.	.20	153.00
05/14/19	JKH	Prepare Legal Papers Beechwood - preparing subpoena and Notice of Subpoena	.80	236.00
05/14/19	JKH	Prepare Legal Papers Beechwood - reviewing document request list and preparing draft subpoena rider	.70	206.50
05/14/19	JKH	Research Beechwood - researching subpoena rules	.30	88.50
05/14/19	WMM	Legal services/Settlement Communications concerning settlement efforts with Beechwood and analysis of same.	.50	397.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 162

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/14/19	WMM	Legal services/Client Communications concerning SHIP's court conference and adjournment of same.	.50	397.50
05/14/19	WMM	Legal services/Legal Papers Communications concerning SHIP motion to dismiss and reviewing same.	1.00	795.00
05/14/19	WMM	Legal services/Legal Papers Communications concerning SHOT document requests changes and reviewing same.	.50	397.50
05/15/19	CMO	Analysis of Resp to disc. device Re: follow up on additional uploads to Relativity Database	.80	236.00
05/15/19	ASH	Analysis of Brief for motion SHIP and Fuzion's Memorandum of Law in support of their Motion to Dismiss	.90	684.00
05/15/19	ASH	Examine Documents Review document productions by opposing parties	.50	380.00
05/15/19	ASH	Telephone Call(s) w/CoCounsel - Other With Barbra Parlin documents uploaded to workspaces	.30	228.00
05/15/19	ASH	Correspondence w/CoCounsel - Other To Kevin Melfi and Chris Sharp regarding opposing counsel Workspaces (4)	.30	228.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 163

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/15/19	EBW	Review Documents Beechwood - attention to document production issues.	.20	153.00
05/15/19	EBW	Telephone Call(s) Beechwood - teleconference with T. Rogers regarding potential witnesses.	.20	153.00
05/15/19	EBW	Analysis of Legal Papers Beechwood - review of various motions to dismiss.	1.50	1,147.50
05/15/19	ACS	Analysis of Legal Papers Review SHIP motion to dismiss re in pari delicto	.20	173.00
05/15/19	WMM	Legal services/Legal Papers Review of pleadings	1.50	1,192.50
05/16/19	ASH	Review/correct Subpoena Revise subpoena to SHOT; review background documents regarding same	2.10	1,596.00
05/16/19	ASH	Analysis of Brief for motion Beechwood Re's Memorandum of Law in support of Chapter 15 proceeding	.40	304.00
05/16/19	ASH	Analysis of Answer SHIP Answer	.40	304.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 164

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/16/19	ASH	Correspondence w/CoCounsel - Other To Brent Weisenberg and Karthik Bhavaraju regarding subpoena to SHOT (3)	.20	152.00
05/16/19	ASH	Analysis of Affidavit for motion Declaration of Stuart Sybersma in Support of Beechwood's Application for Provisional Relief	.20	152.00
05/16/19	EBW	Analysis of Legal Papers Beechwood - analysis of Chapter 15 issues and preparation for court.	.80	612.00
05/16/19	EBW	Analysis of Legal Papers Beechwood - analysis of pleadings; including motions to dismiss.	1.30	994.50
05/16/19	EBW	Review Documents Beechwood - attention to discovery issues.	.30	229.50
05/16/19	JKH	Review Documents Beechwood - reviewing all motions to dismiss and related documents and creating document binders and electronic folders re same	2.60	767.00
05/16/19	JKH	Analyze Documents Beechwood - reviewing docket re Beechwood Re Ch. 15 filing	1.40	413.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 165

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/16/19	JKH	Prepare Legal Papers Preparing Notices of Appearance in ch. 15 Beechwood case	.80	236.00
05/16/19	JKH	Review Documents Beechwood - reviewing articles re Beechwood Re ch. 15 filing; preparing and sending email to group re same	.30	88.50
05/16/19	WMM	Legal services/Settlement REview and revise draft letter to Proskauer concerning settlement; reviewing SHIP's Answer.	1.60	1,272.00
05/17/19	EBW	Preparation for Court Beechwood - preparation for Chapter 15 hearing.	.40	306.00
05/17/19	EBW	Attend Court Beechwood - attendance at Chapter 15 hearing.	2.50	1,912.50
05/17/19	EBW	Conference Out of Office Beechwood - conference with counsel for PPVA regarding items of mutual interest.	.50	382.50
05/17/19	EBW	Analysis of Legal Papers Beechwood - review of pleadings; including motions to dismiss.	2.50	1,912.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 166

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/17/19	EBW	Correspondence Beechwood - correspondence with Receivership team regarding discovery issues.	.30	229.50
05/17/19	JKH	Filing Papers at Court Beechwood - filing NOAs in Beechwood re ch 15 case	.40	118.00
05/17/19	JKH	Review Documents Beechwood - reviewing document production	.30	88.50
05/17/19	WMM	Legal services/Legal Papers Reviewing draft letter to Proskauer concerning settlement and revise same.	.50	397.50
05/18/19	ASH	Analysis of Brief for motion Memoranda of Law in support of motion to dismiss	1.20	912.00
05/20/19	ASH	Conference(s) w/ CoCounsel - Other EBW; WMM; GSL; Karthik Bhavaraju; GSL; Brent Weisenberg and Alois Chakabva regarding motions to dismiss and factual issues	1.40	1,064.00
05/20/19	ASH	Preparation of Legal Papers List of issues regarding motions to dismiss	.40	304.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 167

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/20/19	ASH	Research re Opposing brief for motion Legal research regarding statute of limitations issue raised by a defendant in brief	1.10	836.00
05/20/19	EBW	Conference(s) In Office Beechwood - conference with receivership litigation team regarding strategy for responding to motions to dismiss.	2.00	1,530.00
05/20/19	EBW	Review Documents Beechwood - analysis of discovery issues.	.60	459.00
05/20/19	EBW	Analysis of Legal Papers Beechwood - analysis of pleadings.	2.40	1,836.00
05/20/19	GSL	Examine Documents Review of motions to dismiss the Receiver's FAC	.40	118.00
05/20/19	GSL	Conference(s) In Office Platinum meeting - re motions to dismiss	1.50	442.50
05/20/19	GSL	Research Research for opposition- re motions to dismiss Receiver's FAC	1.50	442.50
05/20/19	JKH	Conference(s) in Office Beechwood - meeting to discuss next steps	2.00	590.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 168

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/20/19	JKH	Correspondence Beechwood - preparing draft email re request for answering motions to dismiss; sending same to GSL for review	.60	177.00
05/20/19	JKH	Correspondence Beechwood - email communications with Strategic regarding new production to be added	.40	118.00
05/20/19	WMM	Legal services/Legal Papers Conference with Team and communications concerning SHOT subpoena	1.50	1,192.50
05/20/19	WMM	Legal services/Legal Papers Review statute of limitations research and communications concerning same.	.50	397.50
05/21/19	CMO	Research re Subpoena FRCP on service; notice and subpoenas	.20	59.00
05/21/19	CMO	Preparation of e-mail(s) To Relativity hosting vendor re: external drives	.20	59.00
05/21/19	CMO	Telephone Call(s):Resp to disc. device With Relativity hosting vendor re: external drives	.10	29.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 169

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/21/19	ASH	Research re Opposing brief for motion Legal research regarding issues raised by opposing parties in Beechwood litigation	2.10	1,596.00
05/21/19	ASH	Preparation of Opposing brief for motion Outline of arguments for opposition to motion to dismiss	1.10	836.00
05/21/19	ASH	Correspondence w/CoCounsel - Other To Paul Poteat regarding issues relating to discovery	.10	76.00
05/21/19	ASH	Research re Subpoena Legal research regarding subpoenas	.20	152.00
05/21/19	ASH	Analysis of Opposing brief for motion Review prior memoranda of law in opposition to motions to dismiss	1.40	1,064.00
05/21/19	EBW	Preparation of Legal Papers Beechwood - preparation of discovery requests.	.80	612.00
05/21/19	EBW	Correspondence Beechwood - correspondence with counsel for Chapter 15 debtor.	.10	76.50
05/21/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for PPVA regarding items of mutual interest.	.20	153.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 170

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/21/19	EBW	Correspondence Beechwood - correspondence with receivership team and other counsel regarding various discovery issues.	.90	688.50
05/21/19	EBW	Analysis of Legal Papers Beechwood - analysis of pleadings; including cross-claims and third-party complaints; as well as ruling on advancement.	1.40	1,071.00
05/21/19	EBW	Legal Research Beechwood - analysis of legal research regarding motions to dismiss.	1.60	1,224.00
05/21/19	GSL	Analysis/Strategy Research on statute of limitations - re motions to dismiss FAC	4.30	1,268.50
05/21/19	GSL	Analysis/Strategy Research on civil procedure - re answer	.80	236.00
05/21/19	GSL	Prepare Order Prepared proposed order for leave to file omnibus brief	1.60	472.00
05/21/19	JKH	Document Review Beechwood - Doc Review	2.50	737.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 171

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/21/19	JKH	Research Beechwood - research regarding serice of subpoena	.80	236.00
05/21/19	JKH	Research Beechwood - researching address to serve SHOT subpoena	.40	118.00
05/21/19	JKH	Review Documents Beechwood - reviewing timing of when SHIP filed Answer	.10	29.50
05/21/19	JKH	Review Documents Beechwood - review of email regarding deponent list	.20	59.00
05/21/19	JKH	Review Documents Beechwood - reviewing opinion and order and circulating to team	.10	29.50
05/22/19	CMO	Analysis of Resp to disc. device Issues re: uploading parts of Ship production to Relativity	.30	88.50
05/22/19	CMO	Analysis of Subpoena Re: information for service address from PA Secretary of State	.20	59.00
05/22/19	ASH	Telephone Call(s) w/CoCounsel - Other EBW and John Jureller regarding Beechwood Re	.30	228.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 172

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/22/19	ASH	Telephone Call(s) w/CoCounsel - Other EBW and Brent Weisenberg regarding papers	.20	152.00
05/22/19	ASH	Review/correct Order Proposed Order	.10	76.00
05/22/19	ASH	Research re Opposing brief for motion regarding statute of limitations issue raised in opposing counsel's papers	.50	380.00
05/22/19	ASH	Correspondence w/Adversary E-mail to all counsel regarding notice of subpoena to SHOT	.20	152.00
05/22/19	ASH	Analysis of Memorandum from GSL regarding statute of limitations	.20	152.00
05/22/19	ASH	Analysis of Memorandum From GSL regarding simultaneous filing of answer and motion to dismiss	.20	152.00
05/22/19	ASH	Examine Documents Outline prepared by Brent Weisenberg of portions of motion to dismiss relating to Beechwood defendants	.40	304.00
05/22/19	ASH	Preparation of Legal Papers Prepare detailed outline of opposition to motions to dismiss; review briefs regarding same	2.70	2,052.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 173

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/22/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for Beechwood chapter 15 counsel regarding recognition and stay.	.40	306.00
05/22/19	EBW	Analysis of Legal Papers Beechwood - analysis of issues regarding Chapter 15 in preparation for teleconference with counsel for debtor.	.20	153.00
05/22/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for Beechwood regarding page limitations.	.10	76.50
05/22/19	EBW	Correspondence Beechwood - correspondence with court regarding page limitations and revisions to order.	.40	306.00
05/22/19	EBW	Correspondence Beechwood - correspondence with court regarding page limitations and revisions to order.	.20	153.00
05/22/19	EBW	Conference(s) In Office Beechwood - conference with A. Silverstein regarding overall Platinum litigation strategy.	.30	229.50
05/22/19	EBW	Preparation of Legal Papers Beechwood - review and execute subpoena to non-party.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 174

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/22/19	EBW	Legal Research Beechwood - analysis of legal research applicable to motions to dismiss.	5.20	3,978.00
05/22/19	GSL	Analysis/Strategy Research - opposition to motions to dismiss FAC	2.60	767.00
05/22/19	GSL	Analysis/Strategy Prepared summary of research - re statute of limitations	1.00	295.00
05/22/19	GSL	Analysis/Strategy Continued research - re Answer and MTD	1.30	383.50
05/22/19	JKH	Prepare Legal Papers Beechwood - reviewing prior emails and court docket and preparing Notice of subpoena service list	1.70	501.50
05/22/19	JKH	Prepare Legal Papers Beechwood - editing SHOT Subpoena and preparing final for service	1.20	354.00
05/22/19	JKH	Correspondence Beechwood - communications with SHIP counsel re issues with document production	.20	59.00
05/22/19	JKH	Diary & Docket Beechwood - calendar SHOT response to subpoena deadline	.10	29.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 175

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/22/19	JKH	Correspondence Beechwood - preparing email to service company attaching SHOT subpoena for service	.20	59.00
05/22/19	WMM	Preparation for Conference Communications concerning outlining opposition to motion and application for brief pages.	.50	397.50
05/22/19	WMM	Legal services/Legal Papers Analyzing statute of limitations research.	1.50	1,192.50
05/23/19	ASH	Conference(s) w/ CoCounsel - Other EBW; WMM; GSL; Brent Weisneberg re discovery	.70	532.00
05/23/19	ASH	Conference(s) w/ CoCounsel - Other Brent Weisenberg and GSL regarding response to motions to dismiss	1.00	760.00
05/23/19	ASH	Preparation of Legal Papers Detailed outline of memorandum of law in opposition to motions to dismiss	1.70	1,292.00
05/23/19	ASH	Examine Documents Loan documents; e-mail to GSL and Brent Weisenberg regarding same	.50	380.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 176

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/23/19	ASH	Analysis of Court Decision Decisions by Judge Rakoff on prior motions to dismiss	1.30	988.00
05/23/19	EBW	Conference(s) In Office Beechwood - conference with litigation team regarding depositions.	.50	382.50
05/23/19	EBW	Legal Research Beechwood - analysis of legal research regarding motions to dismiss.	2.70	2,065.50
05/23/19	GSL	Analysis/Strategy Research - re opposition to motions to dismiss FAC	3.90	1,150.50
05/23/19	GSL	Memorandum re Reply brief for motion Prepared draft section for opposition to motions to dismiss FAC	2.20	649.00
05/23/19	GSL	Analysis/Strategy Platinum meeting with ASH and Brent - re motions to dismiss FAC	1.50	442.50
05/23/19	GSL	Conference(s) In Office Platinum meeting - re depositions	.60	177.00
05/23/19	GSL	Analysis/Strategy Continued research - re opposition to motions to dismiss FAC	1.00	295.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 177

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/23/19	JKH	Conference(s) in Office Beechwood - Meeting with team to discuss possible deponents	.80	236.00
05/23/19	JKH	Correspondence Beechwood - email communications with Strategic regarding issues with productions	.40	118.00
05/23/19	WMM	Legal services/Legal Papers Team conference concerning depositions and lists of same; communications concerning same.	1.50	1,192.50
05/24/19	ASH	Preparation of Opposing brief for motion Omnibus Memorandum of Law in Opposition to Motions to Dismiss	.60	456.00
05/24/19	EBW	Correspondence Beechwood - correspondence with PPVA's counsel regarding chapter 15 status and strategy.	.20	153.00
05/24/19	EBW	Telephone Call(s) Beechwood - teleconference with PPVA's counsel regarding discovery.	.30	229.50
05/24/19	EBW	Correspondence Beechwood - attention to document production issues.	.20	153.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 178

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/24/19	EBW	Analysis of Legal Papers Beechwood - analysis of criminal trial matters potential relationship to Beechwood litigation.	.60	459.00
05/24/19	EBW	Legal Research Beechwood - legal research regarding motions to dismiss.	1.40	1,071.00
05/24/19	GSL	Analysis/Strategy Review of consolidated docket for preparation of opposition - re motions to dismiss FAC	1.70	501.50
05/24/19	GSL	Analysis/Strategy Continued research for preparation of draft of opposition to motions to dismiss	2.70	796.50
05/24/19	GSL	Memorandum re Reply brief for motion Prepared draft of section for opposition to motions to dismiss	2.50	737.50
05/24/19	JKH	Correspondence Beechwood - follow-up email communications with PPS regarding service of shot; providing update to team regarding same	.20	59.00
05/24/19	WMM	Preparation of Brief for motion Communications concerning drafting securities brief point and outlining same.	2.50	1,987.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 179

October 17, 2019  
BILL NO. 205506

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/25/19 ASH	Preparation of Opposing brief for motion Prepare Omnibus Memorandum of Law in Opposition to Motion to Dismiss	3.10	2,356.00
05/25/19 GSL	Memorandum re Reply brief for motion Continued preparing draft section of opposition to motions to dismiss	2.00	590.00
05/26/19 ASH	Preparation of Opposing brief for motion Memorandum of Law in Opposition to Motions to Dismiss	2.30	1,748.00
05/26/19 GSL	Memorandum re Reply brief for motion Continued drafting section of memorandum of law in opposition to motions to dismiss FAC	2.00	590.00
05/26/19 JKH	Analyze Documents Beechwood - reviewing amended complaint; motions to dismiss; answers and third party complaints	5.00	1,475.00
05/27/19 ASH	Preparation of Opposing brief for motion Memorandum of Law in Opposition to Motions to Dismiss	3.90	2,964.00
05/27/19 ASH	Analysis of Complaint Amended Complaint	1.10	836.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 180

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/27/19	GSL	Memorandum re Reply brief for motion Continued drafting section of memorandum of law in opposition to motions to dismiss FAC	3.00	885.00
05/27/19	JKH	Document Review Beechwood - document review	4.50	1,327.50
05/27/19	JKH	Draft/revise Beechwood - prepare notes on doc review	.50	147.50
05/28/19	ASH	Telephone Call(s) w/CoCounsel - Other With Bill Moran and Brent Weisenberg regarding motion to dismiss	.40	304.00
05/28/19	ASH	Preparation of Opposing brief for motion Prepare Memorandum of Law in Opposition to Motions to Dismiss	1.80	1,368.00
05/28/19	ASH	Analysis of Correspondence Review correspondence from John Aerni regarding discovery; prepare e-mails to EBW; Brent Weisenberg and WMM regarding same	.20	152.00
05/28/19	EBW	Correspondence Beechwood - correspondence and teleconference with PPVA's counsel about matters of mutual interest.	.40	306.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 181

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/28/19	EBW	Correspondence Beechwood - correspondence with counsel for chapter 15 debtor.	.20	153.00
05/28/19	EBW	Correspondence Beechwood - correspondence with PPVA and document vendor regarding viewing and production issues.	.70	535.50
05/28/19	EBW	Analysis of Legal Papers Beechwood - analysis of legal research and outlines regarding motions to dismiss in conjunction with opposing motion to dismiss.	1.80	1,377.00
05/28/19	ACS	Review/correct Opposing brief for motion Review and insert comments into draft Agera complaint	2.60	2,249.00
05/28/19	GSL	Memorandum re Reply brief for motion Continued drafting section of memorandum of law in opposition to motions to dismiss FAC	1.70	501.50
05/28/19	GSL	Analysis/Strategy Research on pleading standards -- re opposition to motions to dismiss FAC	.90	265.50
05/28/19	GSL	Analysis/Strategy Securities fraud research - re motions to dismiss FAC	3.40	1,003.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 182

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/28/19	GSL	Analysis/Strategy Review of Rakoff's orders in related cases - re motions to dismiss FAC	1.90	560.50
05/28/19	JKH	Correspondence Beechwood - preparing email summary regarding doc review results	.70	206.50
05/28/19	JKH	Review Documents Beechwood - searching system for documents received from D&P	.40	118.00
05/28/19	WMM	Preparation of Brief for motion Team meeting concerning outline of draft points for brief; and drafting same for securities claims.	5.00	3,975.00
05/29/19	ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motions to dismiss	8.80	6,688.00
05/29/19	ASH	Research re Opposing brief for motion Legal research regarding memorandum of law in opposition to motion to dismiss; review caselaw regarding securities law	1.20	912.00
05/29/19	EBW	Correspondence Beechwood - correspondence with adversaries; vendor and counsel for PPVA regarding document production issues.	1.10	841.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 183

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/29/19	EBW	Preparation of Legal Papers Beechwood - review of legal research and outlines regarding motions to dismiss.	1.60	1,224.00
05/29/19	GSL	Analysis/Strategy Continued research - re motions to dismiss FAC	3.70	1,091.50
05/29/19	GSL	Analysis/Strategy Reviewed/prepared summary of research -- re motions to dismiss FAC	3.60	1,062.00
05/29/19	GSL	Analysis/Strategy Continued research - re motions to dismiss FAC	1.00	295.00
05/29/19	JKH	Correspondence Beechwood - preparing email to counsel regarding issue with production; reviewing reply with attached document fixing issue; forwarding same to Strategic	.60	177.00
05/29/19	WMM	Legal services/Legal Papers Communications concerning issues with PPCO production and email to HK concerning same.	.50	397.50
05/29/19	WMM	Preparation of Brief for motion Reviewing research and continue drafting securities claims brief point.	5.20	4,134.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 184

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/30/19	ASH	Correspondence w/CoCounsel - Other Warren Gluck; Kevin Melfi and EBW regarding privilege screens	.30	228.00
05/30/19	ASH	Analysis of Correspondence Review correspondence from EBW; representatives of Strategic; Warren Gluck; Sheila Shen; Adam Kaiser; Julia Gumpper; Aidan McCormack and Gabriel Hertzberg regarding issues relating to document productions	.20	152.00
05/30/19	ASH	Preparation of Opposing brief for motion Memorandum of Law in Opposition to Motions to Dismiss	3.10	2,356.00
05/30/19	ASH	Examine Documents Assignment Agreements and loan transaction documents	1.10	836.00
05/30/19	ASH	Analysis of Opposing brief for motion PPVA's Memorandum of Law in Opposition to Second Round of Motion to Dismiss	.40	304.00
05/30/19	ASH	Analysis of Memorandum Regarding aiding and abetting breach of fiduciary duty; from GSL regarding PSLRA	.40	304.00
05/30/19	ASH	Research re Opposing brief for motion Aiding and abetting breach of fiduciary duty and unjust enrichment	1.40	1,064.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 185

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/30/19	ASH	Telephone Call(s) w/CoCounsel - Other Brent Weisenberg regarding opposition to motions to dismiss	.10	76.00
05/30/19	EBW	Telephone Call(s) Beechwood - pre- and post call with PPVA's counsel regarding meet and confer with adversaries.	.40	306.00
05/30/19	EBW	Telephone Call(s) Beechwood - meet and confer with adversaries regarding privilege.	.60	459.00
05/30/19	EBW	Correspondence Beechwood -correspondence with adversaries; PPVA and vendor regarding privilege and production.	1.20	918.00
05/30/19	EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motion to dismiss.	1.70	1,300.50
05/30/19	GSL	Analysis/Strategy Prepared summary of research - re motions to dismiss FAC	.70	206.50
05/30/19	GSL	Memorandum re Reply brief for motion Continued drafting section of MOL in opposition to motions to dismiss FAC	.80	236.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 186

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/30/19	JKH	Analyze Documents Beechwood - Review and circulate PPVA MOL in Response to PB MTD and related Declaration	.20	59.00
05/30/19	JKH	Correspondence Beechwood - email communications with Strategic re status of uploaded productions	.10	29.50
05/30/19	WMM	Preparation of Brief for motion Drafting brief securities point and researching same.	5.20	4,134.00
05/31/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with opposing counsel and Warren Gluck regarding discovery	1.00	760.00
05/31/19	ASH	Telephone Call(s) w/CoCounsel - Other with EBW and Warren Gluck regarding discovery	.30	228.00
05/31/19	ASH	Research re Opposing brief for motion Legal research regarding numerous issues relating to memorandum of law in opposition to motions to dismiss	2.80	2,128.00
05/31/19	ASH	Preparation of Opposing brief for motion Prepare Memorandum of Law in Opposition to Motions to Dismiss	2.30	1,748.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 187

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/31/19	ASH	Examine Documents documents relating to privilege screens	.20	152.00
05/31/19	ASH	Analysis of Correspondence Numerous from Sheila Shen; Warren Gluck; EBW; Chris Sharp and Kevin Melfi regarding discovery issues; privilege screens and numbers	.20	152.00
05/31/19	ASH	Analysis of Complaint First Amended Complaint	.50	380.00
05/31/19	ASH	Telephone Call(s) w/CoCounsel - Other Brent Weisenberg regarding memorandum of law in opposition to motions to dismiss	.10	76.00
05/31/19	EBW	Correspondence Beechwood - correspondence with vendor; PPVA and adversaries regarding privilege and meet and confer.	.70	535.50
05/31/19	EBW	Telephone Call(s) Beechwood - meet and confer with adversaries regarding privilege.	1.00	765.00
05/31/19	EBW	Preparation for Conference Beechwood - preparation for meet and confers regarding privilege; including pre- and post-calls with counsel for PPVA.	.80	612.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 188

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/31/19	EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions to dismiss.	.70	535.50
05/31/19	GSL	Memorandum re Reply brief for motion Continued drafting MOL in opposition to motions to dismiss FAC	2.10	619.50
05/31/19	GSL	Memorandum re Reply brief for motion Continued drafting MOL in opposition to motions to dismiss FAC	2.40	708.00
05/31/19	GSL	Memorandum re Reply brief for motion Continued drafting MOL in opposition to motions to dismiss FAC	4.00	1,180.00
05/31/19	GSL	Memorandum re Reply brief for motion MOL formatting -- re opposition to motions to dismiss FAC	1.10	324.50
05/31/19	WMM	Preparation of Brief for motion Drafting brief point and communications concerning same.	4.50	3,577.50
06/01/19	ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motions to dismiss	3.60	2,736.00
06/01/19	EBW	Analysis of Legal Papers Beechwood - analysis of litigation issues.	.80	612.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 189

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/02/19	ASH	Preparation of Opposing brief for motion Memorandum of Law in Opposition to Motions to Dismiss	6.90	5,244.00
06/02/19	ASH	Research re Opposing brief for motion Legal research regarding memorandum of law in support of motion to dismiss	2.30	1,748.00
06/03/19	ASH	Analysis of Stipulation Stipulations for the protection of confidential information	.10	76.00
06/03/19	ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motions to dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants other than PBIH	4.60	3,496.00
06/03/19	ASH	Analysis of Memorandum From GSL regarding amendments to the PSLRA	.20	152.00
06/03/19	ASH	Analysis of Memorandum from GSL regarding choice of law analysis	.30	228.00
06/03/19	ASH	Research re Opposing brief for motion Legal research regarding aiding and abetting breach of fiduciary duty	1.30	988.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 190

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/03/19	EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motion to dismiss.	3.50	2,677.50
06/03/19	EBW	Correspondence Beechwood - correspondence with vendor regarding document production.	.30	229.50
06/03/19	GSL	Analysis/Strategy Review of draft MOL in opposition to MTD FAC	.20	59.00
06/03/19	GSL	Analysis/Strategy Research for opposition to MTDs FAC	3.40	1,003.00
06/03/19	GSL	Analysis/Strategy Research for opposition to MTD FAC	3.00	885.00
06/03/19	GSL	Analysis/Strategy Prepared summary - choice of laws research - re opposition to MTD FAC	1.00	295.00
06/03/19	GSL	Analysis/Strategy Research for opposition to MTDs FAC	1.40	413.00
06/03/19	JKH	Correspondence Beechwood - preparing email with attachments for TRO in preparation for PPVA hearing	.70	206.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 191

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/03/19	WMM	Preparation of Opposing brief for motion Drafting and revising opposition to motion to dismiss	5.60	4,452.00
06/04/19	ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motions to dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants other than PBIH	6.90	5,244.00
06/04/19	ASH	Research re Opposing brief for motion Review caselaw regarding defenses	1.30	988.00
06/04/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with EBW and counsel for the Bodner Group; CNO; SHIP and PPVA regarding privilege screens	.30	228.00
06/04/19	ASH	Analysis of Memorandum Memos from Gabriela Leon regarding defenses	.40	304.00
06/04/19	ASH	Conference(s) w/ CoCounsel - Other with EBW regarding his comments on memorandum of law in opposition to motions to dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants other than PBIH	.20	152.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 192

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/04/19	EBW	Preparation of Legal Papers Beechwood - revisions to opposition to motion to dismiss.	.40	306.00
06/04/19	EBW	Correspondence Beechwood - correspondence with counsel for subpoena recipient.	.20	153.00
06/04/19	EBW	Attend Court Beechwood - attendance at hearing on motions to dismiss as to PPVA.	4.00	3,060.00
06/04/19	EBW	Preparation for Conference Beechwood - preparation for discovery meet and confer.	.30	229.50
06/04/19	EBW	Telephone Call(s) Beechwood - participation in telephonic meet and confer with all counsel.	1.00	765.00
06/04/19	GSL	Analysis/Strategy Continued research for opposition to MTD FAC	1.90	560.50
06/04/19	GSL	Memorandum re Reply brief for motion Edits to draft MOL - re opposition to MTD FAC	2.90	855.50
06/04/19	GSL	Analysis/Strategy Continued research for opposition to dismiss FAC	1.80	531.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 193

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/04/19	JKH	Analyze Documents Beechwood - review Beechwood re scheduling order and calendaring hearing and objection deadline	.40	118.00
06/04/19	JKH	Correspondence Beechwood - preparing email in response to a request regarding SHOT subpoena	.30	88.50
06/04/19	JKH	Document Review Beechwood - doc review	3.40	1,003.00
06/04/19	WMM	Preparation of Opposing brief for motion Reviewing chart for brief and continue drafting; research and revising same.	7.50	5,962.50
06/05/19	ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motions to dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants other than PBIH	7.40	5,624.00
06/05/19	ASH	Telephone Call(s) w/CoCounsel - Other Brent Weisenberg regarding memorandum of law in opposition to motions to dismiss	.20	152.00
06/05/19	ASH	Research re Opposing brief for motion Review caselaw regarding defenses	1.40	1,064.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 194

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/05/19	ASH	Analysis of Memorandum Review memorandum regarding defenses	.20	152.00
06/05/19	ASH	Examine Documents Documents relating to dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants other than PBIH	.20	152.00
06/05/19	EBW	Preparation of Legal Papers Beechwood - revisions to opposition to motion to dismiss.	2.80	2,142.00
06/05/19	EBW	Telephone Call(s) Beechwood - meet and confer with counsel for subpoena recipient.	.30	229.50
06/05/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for Wilmington Trust.	.20	153.00
06/05/19	GSL	Analysis/Strategy Reviewed MTDs FAC - re opposition to MTD	1.40	413.00
06/05/19	GSL	Analysis/Strategy Shepardized/reviewed cases cited in BCLIC/WNIC MTD	2.90	855.50
06/05/19	GSL	Analysis/Strategy Prepared chart summarizing/shepardizing cases cited in BCLIC/WNIC MTD	2.00	590.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 195

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/05/19	GSL	Analysis/Strategy Review draft MOL - re opposition to MTD FAC	1.10	324.50
06/05/19	JKH	Document Review Beechwood - doc review	3.20	944.00
06/05/19	WMM	Preparation of Opposing brief for motion Review; research and revising brief; and communications concerning same.	7.20	5,724.00
06/06/19	ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motions to dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants other than PBIH	6.60	5,016.00
06/06/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone calls with Brent Weisenberg regarding memorandum of law in opposition to motions to dismiss	.30	228.00
06/06/19	ASH	Research re Opposing brief for motion Legal research regarding defenses	.70	532.00
06/06/19	EBW	Preparation of Legal Papers Beechwood - revisions to opposition to motions to dismiss.	.60	459.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 196

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/06/19	EBW	Telephone Call(s) Beechwood - teleconferences with A. Halpern and B. Weisenberg regarding opposition to motions to dismiss.	.60	459.00
06/06/19	EBW	Correspondence Beechwood - correspondence with counsel regarding scheduling issues.	.20	153.00
06/06/19	GSL	Analysis/Strategy Changes/edits to MOL - re opposition to MTD FAC	2.70	796.50
06/06/19	GSL	Analysis/Strategy Continued summary of cases cited in BCLIC/WNIC MTD - re opposition to MTD FAC	.40	118.00
06/06/19	GSL	Analysis/Strategy Continued research - re MTD to FAC	2.10	619.50
06/06/19	JKH	Prepare Legal Papers Beechwood - Prepare Notice of Subpoena for D&P	.20	59.00
06/06/19	JKH	Prepare Legal Papers Beechwood - Prepare Notice of subpoena for Lincoln	.20	59.00
06/06/19	JKH	Prepare Legal Papers Beechwood - prepare subpoena for D&P	.30	88.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 197

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/06/19	JKH	Prepare Legal Papers Beechwood - prepare subpoena for Lincoln	.10	29.50
06/06/19	JKH	Document Review Beechwood - Doc Review	2.40	708.00
06/06/19	WMM	Preparation of Opposing brief for motion Research and revising brief; communications concerning same	7.50	5,962.50
06/07/19	ASH	Preparation of Opposing brief for motion Memorandum of Law in Opposition to Motions to Dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants	4.50	3,420.00
06/07/19	ASH	Research re Opposing brief for motion Legal research regarding defenses	1.80	1,368.00
06/07/19	EBW	Telephone Call(s) Beechwood - teleconference with vendor regarding document issues.	.60	459.00
06/07/19	EBW	Preparation of Legal Papers Beechwood - revisions to opposition to motion to dismiss.	3.80	2,907.00
06/07/19	EBW	Preparation of Legal Papers Beechwood - preparation of document requests.	.20	153.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 198

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/07/19	GSL	Analysis/Strategy Review of draft MOL - re opposition to MTD FAC	1.40	413.00
06/07/19	GSL	Analysis/Strategy Continued review of cases cited in MTDs FAC	3.00	885.00
06/07/19	GSL	Analysis/Strategy Prepared chart summarizing/shepardizing cases cited in MTDs FAC	2.00	590.00
06/07/19	JKH	Review Documents Beechwood - review draft response to motion to dismiss	.90	265.50
06/07/19	JKH	Document Review Beechwood - document review	1.60	472.00
06/07/19	WMM	Preparation of Opposing brief for motion Communications concerning brief and revising same.	6.50	5,167.50
06/08/19	ASH	Preparation of Opposing brief for motion Prepare Memorandum of Law in Opposition to Motions to Dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants	4.60	3,496.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 199

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/08/19	ASH	Research re Opposing brief for motion Legal research regarding issues raised by BCLIC/WNIC in Memorandum of Law in Support of Motion to Dismiss Amended Complaint	2.10	1,596.00
06/08/19	EBW	Preparation of Legal Papers Beechwood - review of drafts of opposition to motion to dismiss.	.80	612.00
06/09/19	ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motions to dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants other than PBIH	6.20	4,712.00
06/09/19	EBW	Preparation of Legal Papers Beechwood - review of drafts of opposition to motion to dismiss.	.70	535.50
06/09/19	JKH	Document Review Beechwood - Document review	2.70	796.50
06/10/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with EBW; GSL; Brent Weisenberg and William Moran regarding memorandum of law in opposition to motions to dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants other than PBIH	1.10	836.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 200

October 17, 2019  
BILL NO. 205506

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/10/19 ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motions to dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants other than PBIH	4.70	3,572.00
06/10/19 ASH	Review/correct Opposing brief for motion Prepare memorandum of law in opposition to motions to dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants other than PBIH	2.20	1,672.00
06/10/19 ASH	Research re Opposing brief for motion Review decisions and Platinum-Beechwood litigation; legal research regarding causes	2.70	2,052.00
06/10/19 EBW	Conference(s) In Office Beechwood - status and strategy meeting with litigation team regarding opposition to motions to dismiss.	1.10	841.50
06/10/19 EBW	Preparation of Legal Papers Beechwood - revisions to opposition to motions to dismiss.	5.80	4,437.00
06/10/19 GSL	Conference(s) In Office Meeting to discuss final steps for MOL in Opposition to MTD FAC	1.00	295.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 201

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/10/19	GSL	Analysis/Strategy Continued preparing chart summarizing cases cited in MTD	.80	236.00
06/10/19	JKH	Prepare Legal Papers Beechwood- preparation of D&P subpoena to be served	.40	118.00
06/10/19	JKH	Document Review Document review	3.20	944.00
06/10/19	WMM	Preparation of Opposing brief for motion Team meeting and continue drafting/revising brief.	5.50	4,372.50
06/11/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with ACS and EBW regarding memorandum of law in support of motions to dismiss	.50	380.00
06/11/19	ASH	Conference(s) w/ CoCounsel - Other Erik Weinick and Brent Weisenberg regarding memorandum of law in opposition to motions to dismiss	3.70	2,812.00
06/11/19	ASH	Preparation of Opposing brief for motion Prepare Memorandum of Law in Opposition to Motions to Dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants other than PBIH	5.20	3,952.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 202

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/11/19	ASH	Research re Opposing brief for motion Legal research regarding claims	1.10	836.00
06/11/19	EBW	Preparation of Legal Papers Beechwood - revisions to opposition to motion to dismiss.	9.20	7,038.00
06/11/19	EBW	Attend Court Beechwood - participation in call to court regarding scheduling matters.	.50	382.50
06/11/19	ACS	Review/correct Reply brief for motion Meet with EBW and ASH re draft opposition to motion to dismiss	.50	432.50
06/11/19	GSL	Analysis/Strategy Continued summarizing cases cited in MTD FAC	1.30	383.50
06/11/19	GSL	Analysis/Strategy Reviewed current draft of Opposition to MTD FAC	.90	265.50
06/11/19	JKH	Analyze Documents Beechwood - reviewing state securities motion	.70	206.50
06/11/19	JKH	Document Review Beechwood - document review	1.30	383.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 203

October 17, 2019  
BILL NO. 205506

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/11/19 WMM	Preparation of Opposing brief for motion Communications and revisions to brief.	2.00	1,590.00
06/12/19 AW	Filing Papers at Court Filed Memo's of LAw	2.90	855.50
06/12/19 ASH	Preparation of Opposing brief for motion Memorandum of Law in Opposition to Motions to Dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants other than PBIH	6.20	4,712.00
06/12/19 ASH	Review/correct Opposing brief for motion Memorandum of Law in Opposition to Motions to Dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants other than PBIH	3.80	2,888.00
06/12/19 ASH	Research re Opposing brief for motion Legal research regarding Memorandum of Law in Opposition to Motions to Dismiss filed by (i) BCLIC and WNIC; (ii) SHIP and Fuzion; (iii) CNO and 40/86; (iv) PBIH and (v) the Beechwood Defendants other than PBIH	.70	532.00
06/12/19 ASH	Conference(s) w/ CoCounsel - Other Meeting with Erik Weinick and Brent Weisenberg regarding memorandum of law in opposition to motions to dismiss	2.40	1,824.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 204

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/12/19	EBW	Preparation of Legal Papers Beechwood - finalize and file opposition to motion to dismiss.	11.50	8,797.50
06/12/19	GSL	Memorandum re Reply brief for motion Final changes/review of MOL in Opposition to MTD before filing	3.70	1,091.50
06/12/19	GSL	Memorandum re Reply brief for motion (Beechwood Litigation): Final review of MOL in Opposition to MTD for filing	6.70	1,976.50
06/12/19	JKH	Document Review Beechwood - document review	1.20	354.00
06/12/19	JKH	Diary & Docket Beechwood - calendar all deadlines relating to state securities motion	.20	59.00
06/12/19	WMM	Preparation of Opposing brief for motion Revising brief and communications concerning same.	1.90	1,510.50
06/13/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel regarding discovery issues.	.40	306.00
06/13/19	EBW	Telephone Call(s) Beechwood - teleconference with Beechwood counsel regarding case.	.40	306.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 205

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/13/19	EBW	Correspondence Beechwood - correspondence and teleconference with SHIP counsel regarding service issues.	.40	306.00
06/13/19	EBW	Preparation of Legal Papers Beechwood - preparation of discovery requests.	.30	229.50
06/13/19	EBW	Correspondence Beechwood - correspondence and teleconference with vendor regarding document preparation.	.30	229.50
06/13/19	EBW	Analysis of Legal Papers Beechwood - analysis of CNO motions.	1.60	1,224.00
06/13/19	JKH	Document Review Beechwood - document review	2.70	796.50
06/13/19	JKH	Conference(s) in Office Beechwood - discussion regarding next steps for summons and subpoena	.20	59.00
06/13/19	JKH	Review Documents Beechwood - reviewing responses to third party complaint	.60	177.00
06/13/19	JKH	Prepare Legal Papers Beechwood - Preparing cover letter and chambers copy of response to MTD	.40	118.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 206

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/14/19	ASH	Analysis of Correspondence from Julia Gumper regarding issues relating to issues the Bodner Group's privilege screens	.20	152.00
06/14/19	EBW	Telephone Call(s) Beechwood - teleconference with B. Parlin regarding depositions.	.10	76.50
06/14/19	EBW	Telephone Call(s) Beechwood - teleconference with vendor regarding production issues.	.40	306.00
06/14/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for Beechwood regarding various.	.40	306.00
06/14/19	EBW	Analysis of Legal Papers Beechwood - analysis of various third-party filings.	2.40	1,836.00
06/14/19	JKH	Document Review Beechwood - Doc review	2.70	796.50
06/14/19	JKH	Diary & Docket Beechwood - calendar oral argument date on third party complaint	.10	29.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 207

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/14/19	WMM	Legal services/Settlement Communications concerning Beechwood; communications with Court concerning copy of unredacted Amended Complaint and send same.	1.00	795.00
06/15/19	JKH	Document Review Beechwood - Document Review	2.00	590.00
06/17/19	ASH	Preparation of Legal Papers Questions for oral argument; list of issues regarding First Amended Complaint	1.10	836.00
06/17/19	ASH	Analysis of Legal Papers Review recent court filings on motions	.50	380.00
06/17/19	EBW	Correspondence Beechwood - correspondence with P. Poteat and document vendor regarding production matters.	.20	153.00
06/17/19	EBW	Analysis of Legal Papers Beechwood - analysis of pleadings.	1.30	994.50
06/17/19	JKH	Document Review Beechwood - document review	1.30	383.50
06/17/19	WMM	Preparation for Court (motion) Review Judge Cogan's Rule 29 Order at trial; analyzing brief in preparation for oral arguments.	1.50	1,192.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 208

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/18/19	ASH	Correspondence w/Adversary To Therese Doherty regarding protective order and unredacted copy of First Amended Complaint (2)	.40	304.00
06/18/19	ASH	Review/correct Subpoena Subpoena to Duff & Phelps	.40	304.00
06/18/19	EBW	Conference(s) In Office Beechwood - conference with Receiver regarding status and strategy.	.20	153.00
06/18/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for Beechwood regarding motions and status.	.10	76.50
06/18/19	EBW	Correspondence Beechwood - correspondence with P. Poteat and Strategic regarding document production.	.30	229.50
06/18/19	EBW	Telephone Call(s) Beechwood - teleconference with P. Poteat and B. Weisenberg regarding document production.	.30	229.50
06/18/19	EBW	Correspondence Beechwood - correspondence with PPVA regarding depositions.	.30	229.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 209

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/18/19	EBW	Preparation of Legal Papers Beechwood - preparation of document requests.	.20	153.00
06/18/19	EBW	Analysis of Legal Papers Beechwood - analysis of filings.	.70	535.50
06/18/19	GSL	Analysis/Strategy Review of BCLIC/WNIC Motion to Enforce Statutes	.30	88.50
06/18/19	JKH	Document Review Beechwood - Doc review	2.00	590.00
06/18/19	JKH	Correspondence Beechwood - prepare draft email relating to discoveries in doc review	.40	118.00
06/18/19	WMM	Legal services/Settlement Communications concerning Beechwood.	.50	397.50
06/19/19	EBW	Correspondence Beechwood - correspondence with counsel for PPVA regarding document production issues.	.30	229.50
06/19/19	EBW	Correspondence Beechwood - correspondence with counsel for Beechwood regarding case status.	.10	76.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 210

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/19/19	EBW	Analysis of Legal Papers Beechwood - analysis of filings.	1.10	841.50
06/19/19	GSL	Analysis/Strategy Research - re motion to enforce security statutes	1.30	383.50
06/19/19	WMM	Legal services/Settlement Communications concerning Beechwood and Landesman estate.	.50	397.50
06/20/19	ASH	Analysis of Legal Papers Telephone call with document vendor	.20	152.00
06/20/19	EBW	Correspondence Beechwood - correspondence with document vendor.	.40	306.00
06/20/19	EBW	Telephone Call(s) Beechwood - teleconference with parties regarding Bodner privilege issue.	.70	535.50
06/20/19	EBW	Telephone Call(s) Beechwood - teleconference/correspondence with adversaries regarding reply briefs.	.30	229.50
06/20/19	EBW	Preparation for Court Beechwood - preparation for argument on motions to dismiss.	1.70	1,300.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 211

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/20/19	EBW	Analysis of Legal Papers Beechwood - attention to CNO's security motion.	.70	535.50
06/20/19	GSL	Analysis/Strategy Continued research - re motion to enforce security statutes	1.90	560.50
06/20/19	GSL	Analysis/Strategy Preparation of outlines - re oral argument on motions to dismiss	3.10	914.50
06/20/19	JKH	Document Review Beechwood - document review	1.80	531.00
06/20/19	JKH	Correspondence Beechwood - email communications with counsel requesting unredacted copy of Beechwood's motion to dismiss SHIP's Third Party Complaint	.10	29.50
06/20/19	JKH	Document Review Beechwood - Document Review	1.20	354.00
06/20/19	WMM	Legal services/Legal Papers Reviewing Beechwood counterclaims against SHIP and communications concerning same and CNO request to extend page limitation for reply papers in motion to dismiss; continue reviewing our brief of same.	2.50	1,987.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 212

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/21/19	ASH	Analysis of Court Decision Opinion by Judge Rakoff on motions to dismiss PPVA claims	1.10	836.00
06/21/19	ASH	Telephone Call(s) w/Court Telephone calls with court and counsel for the CNO Defendants and the SHIP Defendants regarding page limitations	.30	228.00
06/21/19	ASH	Analysis of Memorandum From JKH regarding document review	.20	152.00
06/21/19	EBW	Analysis of Legal Papers Beechwood - analysis of judge's decision on PPVA motion to dismiss.	4.10	3,136.50
06/21/19	EBW	Preparation for Deposition Beechwood - attention to deposition preparation issues.	.60	459.00
06/21/19	GSL	Analysis/Strategy Review of Rakoff's PPVA Order	1.50	442.50
06/21/19	GSL	Analysis/Strategy Prepared summary/analysis of Rakoff's PPVA order	2.60	767.00
06/21/19	JKH	Document Review Beechwood - Document Review	1.80	531.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 213

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/21/19	JKH	Correspondence Beechwood - preparing email summary regarding findings and status of document review	1.10	324.50
06/21/19	JKH	Review Documents Beechwood - reviewing cases cited in opposition to motion to dismiss	2.40	708.00
06/21/19	WMM	Analysis of Legal Papers Analyze Judge Rakoff's decision in PPVA motions to dismiss; communications concerning same; communications concerning document review; review summary of Order and Decision.	2.70	2,146.50
06/22/19	ASH	Preparation for Court (motion) Prepare outline of issues for oral argument on motions to dismiss; analyze briefs regarding same; review background documents regarding same	2.80	2,128.00
06/23/19	ASH	Review/correct Subpoena Subpoena to Duff & Phelps; attachment to subpoena	2.30	1,748.00
06/23/19	ASH	Preparation for Court (motion) Prepare outline of issues for oral argument on motions to dismiss; analyze briefs regarding same; review background documents regarding same	1.70	1,292.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 214

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/24/19	ASH	Review/correct Subpoena to Duff & Phelps	1.60	1,216.00
06/24/19	EBW	Legal Research Beechwood - analysis of legal research.	.30	229.50
06/25/19	ASH	Preparation of Subpoena Subpoena to Duff & Phelps	2.50	1,900.00
06/25/19	ASH	Review/correct Legal Papers Waiver of service of summons	.10	76.00
06/25/19	ASH	Analysis of Correspondence from Trey Rogers regarding motion to dismiss	.10	76.00
06/25/19	EBW	Analysis of Legal Papers Beechwood - attention to CNO security motion.	1.80	1,377.00
06/25/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for PPVA regarding depositions.	.50	382.50
06/25/19	EBW	Review Documents Beechwood - attention to deposition preparation issues.	.80	612.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 215

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/25/19	GSL	Memorandum re Reply brief for motion Prepared joinder to motion - re BCLIC/WNIC motion to enforce security statutes	2.60	767.00
06/25/19	GSL	Memorandum re Reply brief for motion Changes to opposition - prepared joint opposition to BCLIC/WNIC motion to enforce security statutes with PPVA	3.00	885.00
06/25/19	GSL	Analysis/Strategy Prepared waiver of service form for PBIH	.60	177.00
06/25/19	GSL	Analysis/Strategy Review of affidavits of service for return of service	.60	177.00
06/25/19	GSL	Analysis/Strategy Review of Beechwood Re Chapter 15 docket	.50	147.50
06/26/19	ASH	Analysis of Reply brief for motion BCLIC and WNIC's Reply Memorandum in Support of Motion to Dismiss	.40	304.00
06/26/19	ASH	Analysis of Reply brief for motion Reply Memo in Support of Motion to Dismiss filed by PB Investments	.30	228.00
06/26/19	ASH	Analysis of Correspondence from Adam Kaiser regarding issues relating to Beechwood	.20	152.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 216

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/26/19	EBW	Preparation of Legal Papers Beechwood - revisions to objection to CNO security motion.	.70	535.50
06/26/19	EBW	Correspondence Beechwood - correspondence with counsel for PPVA regarding CNO security motion.	.40	306.00
06/26/19	EBW	Telephone Call(s) Beechwood - teleconference with B. Weisenberg regarding depositions and related issues.	.50	382.50
06/26/19	EBW	Correspondence Beechwood - correspondence with document vendor.	.20	153.00
06/26/19	EBW	Analysis of Legal Papers Beechwood - analysis of privilege issues.	.30	229.50
06/26/19	EBW	Analysis of Legal Papers Beechwood - review of replies in further support of motions to dismiss.	3.40	2,601.00
06/26/19	GSL	Memorandum re Reply brief for motion Continued preparation of joint opposition to motion to enforce security statutes	2.10	619.50
06/26/19	GSL	Analysis/Strategy Reviewed replies to omnibus reply to motions to dismiss the FAC	.90	265.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 217

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/26/19	JKH	Analyze Documents Beechwood - reviewing objections and responses and preparing document binder of cited cases	2.30	678.50
06/27/19	ASH	Correspondence w/Adversary Prepare correspondence to opposing party regarding damage claims; analyze background documents regarding same	1.20	912.00
06/27/19	ASH	Preparation of Subpoena Prepare attachment to subpoena to Duff & Phelps	1.10	836.00
06/27/19	EBW	Analysis of Legal Papers Beechwood - review of pleadings and preparation for oral argument.	3.10	2,371.50
06/27/19	EBW	Correspondence Beechwood - correspondence with PPVA regarding; and analysis of issues relating to; motion for chapter 15 recognition.	.30	229.50
06/27/19	EBW	Telephone Call(s) Beechwood - teleconference with adversaries regarding Bodner privilege issues.	.60	459.00
06/27/19	EBW	Correspondence Beechwood - correspondence with Receiver regarding document analysis issues.	.20	153.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 218

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/27/19	GSL	Letter(s)-Court Finalized/mailed courtesy copy of cover letter / courtesy copy of joint opposition	.40	118.00
06/27/19	GSL	Analysis/Strategy Continued review of replies to omnibus opposition to motions to dismiss FAC	.80	236.00
06/27/19	GSL	Analysis/Strategy Continued preparing notes/charts for oral argument on motions to dismiss the FAC	2.30	678.50
06/27/19	JKH	Analyze Documents Beechwood - reviewing cited cases in reply briefs	1.40	413.00
06/27/19	JKH	Analyze Documents Beechwood - reviewing emails with attached unredacted filings and profiling same	.30	88.50
06/27/19	JKH	Pacer-Docket Check Beechwood - reviewing docket for all reply briefs; circulating same	.60	177.00
06/27/19	JKH	Correspondence Beechwood - follow-up email with B. Wisenberg re Summons	.10	29.50
06/27/19	JKH	Prepare Legal Papers Beechwood - preparing chambers copies of objection to beechwood filing	.20	59.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 219

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/28/19	ASH	Analysis of Reply brief for motion CNO and 40/86's Reply Memorandum in Support of Motion to Dismiss	.30	228.00
06/28/19	JKH	Analyze Documents Beechwood - reviewing cited cases in Objection and reply briefs and creating document binder	6.40	1,888.00
TOTAL PHASE P14			973.60	\$575,601.50

Phase: P15

ARBITRATION

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with ACS and GSL regarding strategy for amending Notice of Arbitration	2.00	1,520.00
04/01/19	ASH	Correspondence w/CoCounsel - Other to Karthik Bhavaraju; Alois Chakabva and Trey Rogers regarding documents	.10	76.00
04/01/19	ACS	Review/correct Correspondence Draft and edit retention agreement for damages expert	.60	519.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 220

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and GSL re strategy to amend notice of arbitration	2.00	1,730.00
04/01/19	GSL	Conference(s) In Office Meeting with ACS and ASH to discuss amended Notice of Arbitration (GSL Portion)	1.20	354.00
04/01/19	GSL	Analysis/Strategy Research on in pari delicto	2.60	767.00
04/02/19	CMO	Analysis of Resp to disc. device Re: paper production of documents	.90	265.50
04/02/19	ASH	Conference(s) w/ CoCounsel - Other With Karthik Bhavaraju; Trey Rogers; ACS and GSL regarding issues relating to possible Amended Notice of Arbitration	2.50	1,900.00
04/02/19	ASH	Research re Arbitration statement Review caselaw regarding issues relating to Notice of Arbitration	.80	608.00
04/02/19	ASH	Analysis of Arbitration statement Analyze Notice of Arbitration	.50	380.00
04/02/19	ASH	Analysis of Legal Papers Review documents produced to be produced to respondent in arbitration	.50	380.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 221

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/02/19	ASH	Correspondence w/Adversary With ACS; Karthik Bhavaraju and Trey Rogers regarding meeting to discuss facts	.10	76.00
04/02/19	ACS	Conference(s) w/ CoCounsel - Other Meet with Receiver re expert retentions for arbitration	.80	692.00
04/02/19	ACS	Correspondence w/CoCounsel - Other E-mail to auditing standards expert	.10	86.50
04/02/19	ACS	Correspondence w/CoCounsel - Other E-mail to forensic expert	.10	86.50
04/02/19	ACS	Review/correct Legal Papers Meet with T Rogers; K Bhavaraju; ASH and GSL re amending pleading	2.30	1,989.50
04/02/19	GSL	Analysis/Strategy Continued research on in pari delicto	2.20	649.00
04/02/19	GSL	Memo Prepared memo for ACS and ASH summarizing research	2.10	619.50
04/02/19	GSL	Conference(s) In Office Meeting with ACS; ASH; Goldin and Platinum to discuss arbitration	2.50	737.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 222

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/03/19	CMO	Analysis of Resp to disc. device Documents selected by opposing counsel for reproduction	.70	206.50
04/03/19	ASH	Research re Arbitration statement Review caselaw regarding possible Notice of Arbitration	1.60	1,216.00
04/03/19	ASH	Analysis of Complaint SEC Complaint and exhibits thereto	1.30	988.00
04/03/19	ASH	Correspondence w/Client to Trey Rogers regarding issues relating to proposed Amended Notice of Arbitration	.10	76.00
04/04/19	CMO	Review file re Resp to disc. device Re: paper document prooduction to adversary	.30	88.50
04/04/19	ASH	Analysis of Legal Papers Review documents regarding factual issues	1.40	1,064.00
04/04/19	ASH	Conference(s) w/ CoCounsel - Other Meet with forensic expert and ACS	2.10	1,596.00
04/04/19	ASH	Research re Arbitration statement Review caselaw regarding arbitration statement	2.30	1,748.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 223

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/04/19	ASH	Examine Documents Documents selected by opposing counsel in arbitration	.20	152.00
04/04/19	ACS	Conference(s) w/ CoCounsel - Other Meet with forensic expert and ASH	2.40	2,076.00
04/05/19	ASH	Analysis of Legal Papers Analyze; organize and prepare documents for production	.80	608.00
04/05/19	ASH	Memorandum to CoCounsel - Other to representatives of Strategic regarding document production	.60	456.00
04/05/19	ASH	Analysis of Stipulation Analyze protective order; e-mail to ACS regarding same	.20	152.00
04/06/19	ASH	Research re Arbitration statement Legal research regarding issues relating to Amended Notice of Arbitration	2.20	1,672.00
04/07/19	ASH	Preparation of Arbitration statement Legal research regarding issues relating to arbitration	3.70	2,812.00
04/08/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with ACS; EBW and damages expert	.80	608.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 224

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/08/19	ASH	Conference(s) w/ CoCounsel - Other with ACS regarding theories of the case and Amended Notice of Arbitration	.50	380.00
04/08/19	ASH	Examine Documents Analyze financial statements of PPCO and PPVA	.60	456.00
04/08/19	ASH	Correspondence w/CoCounsel - Other to damages expert regarding background facts and documents	.90	684.00
04/08/19	ASH	Examine Documents Review caselaw regarding issue relating to arbitration	4.30	3,268.00
04/08/19	ASH	Analysis of Correspondence from damages expert and ACS regarding factual issues	.10	76.00
04/08/19	ACS	Correspondence w/Client E-mail to Receiver re accounting expert engagement	.10	86.50
04/08/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon damages expert re arbitration	.80	692.00
04/08/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH re amending notice of arbitration	.50	432.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 225

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/08/19	ACS	Correspondence w/CoCounsel - Other E-mails to/from damages expert re arbitration	.20	173.00
04/09/19	CMO	Analysis of Resp to disc. device Re: processing of paper production in Arbitration matter	.60	177.00
04/09/19	ASH	Conference(s) w/ CoCounsel - Other with ACS regarding confidential arbitration	.60	456.00
04/09/19	ASH	Telephone Call(s) w/CoCounsel - Other With Adam Silverstein and Alois Chakabva	.20	152.00
04/09/19	ASH	Telephone Call(s) w/CoCounsel - Other With ACS and damages expert	.40	304.00
04/09/19	ASH	Preparation of Note of issue Amended Notice of Arbitration	1.70	1,292.00
04/09/19	ASH	Correspondence w/CoCounsel - Other to damages expert	.20	152.00
04/09/19	ASH	Correspondence w/CoCounsel - Other To MLC regarding approval of expenses; to Strategic Legal regarding same	.20	152.00
04/09/19	ASH	Telephone Call(s) w/CoCounsel - Other with Trey Rogers regarding analysis	.30	228.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 226

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/09/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH re confidential arbitration (.6) and telecon A. Chakabva (.2) and telecon D. Prager (.4)	1.20	1,038.00
04/10/19	ASH	Preparation of Note of issue Amended Notice of Arbitration	3.10	2,356.00
04/10/19	ASH	Telephone Call(s) w/CoCounsel - Other With opposing counsel and ACS regarding discovery	.20	152.00
04/10/19	ASH	Telephone Call(s) w/CoCounsel - Other with Trey Rogers regarding analysis	.20	152.00
04/10/19	ASH	Examine Documents Analysis prepared by Trey Rogers	.20	152.00
04/10/19	ASH	Correspondence w/CoCounsel - Other to damages expert	.20	152.00
04/10/19	ASH	Telephone Call(s) w/CoCounsel - Other With Alois Chakabva regarding facts	.10	76.00
04/10/19	ASH	Examine Documents Review analysis of PPVA transfers	.30	228.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 227

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/10/19	ASH	Correspondence w/Adversary To Jenna Polivy regarding gap in CNO's production; review background documents regarding same	.30	228.00
04/10/19	ASH	Analysis of Correspondence Draft letter regarding depositions	.10	76.00
04/10/19	ASH	Analysis of Legal Papers Indictment	.50	380.00
04/10/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and telecon J Bernard re arbitration	.20	173.00
04/10/19	ACS	Conference(s) w/ Client Meet with Receiver and discuss consulting expert retentions	1.10	951.50
04/11/19	ASH	Telephone Call(s) w/CoCounsel - Other Auditing expert and ACS	.20	152.00
04/11/19	ASH	Conference(s) w/ CoCounsel - Other ACS regarding factual and legal issues	1.20	912.00
04/11/19	ASH	Preparation of Complaint Amended Notice of Arbitration	1.10	836.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 228

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/11/19	ASH	Research re Note of issue Legal research regarding issue relating to Amended Notice of Arbitration	.30	228.00
04/11/19	ACS	Correspondence w/CoCounsel - Other E-mail to auditing standards expert	.10	86.50
04/11/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and telecon accounting expert (.2) and strategize over amended arbitration notice and related research(1.2)	1.40	1,211.00
04/11/19	GSL	Conference(s) In Office Meeting with ACS and ASH - re research for arbitration	.60	177.00
04/11/19	GSL	Analysis/Strategy Research on agency	1.00	295.00
04/12/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS; Karthik Bhavaraju; Alois Chakabva and Trey Rogers regarding factual issues	1.30	988.00
04/12/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with ACS and damages consultant	1.20	912.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 229

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/12/19	ASH	Conference(s) w/ CoCounsel - Other with ACS and EBW regarding discovery in arbitration	.30	228.00
04/12/19	ASH	Memorandum to CoCounsel - Other to ACS regarding production of electronic files	.30	228.00
04/12/19	ASH	Analysis of Memorandum Memo from GSL regarding legal issues	.20	152.00
04/12/19	ACS	Review/correct Correspondence Edit engagement letter of auditing standards expert consultant for arbitration	.80	692.00
04/12/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon damages expert re arbitration	1.30	1,124.50
04/12/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH; K Bhavaraju; A Chakabva and T Rogers re arbitration	1.20	1,038.00
04/12/19	GSL	Analysis/Strategy Continued research - re agency	2.50	737.50
04/12/19	GSL	Analysis/Strategy Prepared memo summarizing research - re agency	2.90	855.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 230

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/13/19	ASH	Analysis of Legal Papers Portfolio Management Agreements	.40	304.00
04/13/19	ASH	Preparation of Note of issue Amended Notice of Arbitration	.90	684.00
04/15/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone conference with forensic valuation expert regarding arbitration	1.20	912.00
04/15/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS regarding arbitration	1.10	836.00
04/15/19	ASH	Preparation of Note of issue Prepare Amended Notice of Arbitration	.90	684.00
04/15/19	ASH	Examine Documents Analyze documents relating to factual issues	.50	380.00
04/15/19	ASH	Correspondence w/CoCounsel - Other to Trey Rogers regarding documents	.30	228.00
04/15/19	ASH	Correspondence w/CoCounsel - Other Alois Chakabva regarding auditing standards	.20	152.00
04/15/19	ASH	Memorandum to CoCounsel - Other ACS regarding financial statements	.30	228.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 231

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/15/19	ACS	Correspondence w/CoCounsel - Other E-mail to auditing standards expert re arbitration	.10	86.50
04/15/19	ACS	Research re Complaint Review research for amending notice of arbitration	.30	259.50
04/15/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH (1.1) and telecon forensic/valuation expert (1.1) re arbitration	2.20	1,903.00
04/16/19	ASH	Preparation of Note of issue Prepare Amended Notice of Arbitration	2.30	1,748.00
04/16/19	ASH	Conference(s) w/ CoCounsel - Other Meetings with ACS regarding access to electronic documents in arbitration	1.10	836.00
04/16/19	ASH	Correspondence w/CoCounsel - Other With Kevin Melfi; Christopher Sharp and David Cheifetz regarding discovery	.10	76.00
04/16/19	ASH	Preparation of Legal Papers Summary of status for Adam Silverstein	.20	152.00
04/16/19	ASH	Examine Documents Recent documents regarding PPVA and PPCO	.30	228.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 232

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/16/19	ACS	Correspondence w/Client E-mail from J. Bernard re auditor arbitration	.10	86.50
04/16/19	ACS	Conference(s) w/ CoCounsel - Other Meetings with ASH re access to electronic documents in auditor arbitration	1.10	951.50
04/17/19	ASH	Conference(s) w/ CoCounsel - Other With Alois Chakabva and Adam Silverstein regarding facts	2.10	1,596.00
04/17/19	ASH	Analysis of Memorandum prepared by Alois Chakabva relating to arbitration	.80	608.00
04/17/19	ASH	Preparation of Legal Papers List of items to discuss during meeting with Alois Chakabva	.30	228.00
04/17/19	ASH	Analysis of Legal Papers Review and assemble papers for service of Amended Complaint on Beechwood Trusts	.30	228.00
04/17/19	ASH	Preparation of Note of issue Amended Notice of Arbitration	1.30	988.00
04/17/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon auditing standards expert	.50	432.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 233

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/17/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon Strategic and D Cheifetz re auditor arbitration discovery	.60	519.00
04/17/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and AChakabva re amending arbitration notice	2.10	1,816.50
04/17/19	ACS	Review/correct Correspondence Revise auditing expert engagement and email to auditing expert	.40	346.00
04/17/19	ACS	Correspondence w/CoCounsel - Other E-mail to/from auditing expert's professional staff	.20	173.00
04/17/19	ACS	Review/correct Correspondence Edit forensic/valuation/damages retention letter	.30	259.50
04/18/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with Trey Rogers regarding documents	.10	76.00
04/18/19	ASH	Telephone Call(s) w/CoCounsel - Other Alois Chakbva and accounting expert's assistant	.50	380.00
04/18/19	ASH	Correspondence w/CoCounsel - Other To auditing expert and his assistant regarding materials and background (3)	.40	304.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 234

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/18/19	ASH	Examine Documents Financial statements	.40	304.00
04/18/19	ASH	Preparation of Note of issue Amended Notice of Arbitration	2.60	1,976.00
04/18/19	ASH	Telephone Call(s) w/CoCounsel - Other Assistant to auditing expert and Adam Silverstein	.30	228.00
04/18/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon A Chakabva and auditing expert's staff	.50	432.50
04/18/19	GSL	Analysis/Strategy Review of IMA agreements	1.90	560.50
04/19/19	ASH	Examine Documents Analysis of excel spreadsheets from Trey Rogers	.50	380.00
04/19/19	ASH	Preparation of Note of issue Amended Notice of Arbitration	1.10	836.00
04/19/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS regarding amending Notice of Arbitration	.80	608.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 235

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/19/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH re status and strategy of amending notice of arbitration	.80	692.00
04/20/19	ASH	Examine Documents Review hard copy document production	.50	380.00
04/20/19	ASH	Review/correct Legal Papers Analyze and revise statements of work for counter-party to arbitration	.40	304.00
04/20/19	ASH	Correspondence w/Adversary to opposing counsel regarding Statements of Work from Strategic	.40	304.00
04/20/19	ASH	Preparation of Note of issue Amended Notice of Arbitration	3.90	2,964.00
04/21/19	ASH	Preparation of Note of issue Amended Notice of Arbitration	5.90	4,484.00
04/22/19	CMO	Analysis of Resp to disc. device Paper document production to Stroock	.90	265.50
04/22/19	ASH	Preparation of Note of issue Amended Notice of Arbitration	7.60	5,776.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 236

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/22/19	ASH	Correspondence w/Adversary to opposing counsel in arbitration regarding document production; review production regarding same	.40	304.00
04/22/19	ASH	Correspondence w/CoCounsel - Other With Alois Chakabva and Karthik Bhavaraju regarding factual issues	.30	228.00
04/22/19	ACS	Review/correct Legal Papers Review and edit further revised S&W term sheet	.30	259.50
04/22/19	ACS	Correspondence w/Adversary E-mails from/to J Grekin	.20	173.00
04/22/19	ACS	Review/correct Brief for motion Further edit motion to designate Judge Davis	1.50	1,297.50
04/22/19	JKH	Correspondence Reviewing email from ASH with new production; downloading and updating production list accordingly	.60	177.00
04/23/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with auditing expert regarding auditing standards (ACS participated for a portion of the call)	1.50	1,140.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 237

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/23/19	ASH	Telephone Call(s) w/CoCounsel - Other Trey Rogers regarding facts	.30	228.00
04/23/19	ASH	Telephone Call(s) w/CoCounsel - Other David Prager (Trey Rogers and Adam Silverstein also participated for a portion of the time)	1.20	912.00
04/23/19	ASH	Analysis of Memorandum Memo from Alois Chakabva regarding auditing standards	.80	608.00
04/23/19	ASH	Preparation of Note of issue Prepare Notice of Arbitration	6.70	5,092.00
04/23/19	ASH	Telephone Call(s) w/CoCounsel - Other Adam Silverstein regarding Amended Notice of Arbitration	.20	152.00
04/23/19	ASH	Examine Documents Searches for factual materials regarding issues relating to Amended Notice of Arbitration; analyze materials located in searches	1.10	836.00
04/23/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon ASH re amendments to notice of arbitration	.80	692.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 238

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/23/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon ASH and damages expert re damages measures	.40	346.00
04/24/19	ASH	Preparation of Note of issue Prepare Amended Notice of Arbitration	8.90	6,764.00
04/24/19	ASH	Analysis of Legal Papers Analyze auditing standards	1.10	836.00
04/24/19	ASH	Examine Documents Analyze documents regarding factual issues relating to Amended Notice of Arbitration	1.10	836.00
04/24/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone calls with Alois Chakabva and Karthik Bhavaraju regarding accounting standards (2)	.60	456.00
04/24/19	ACS	Review/correct Legal Papers Edit amended arbitration notice	1.00	865.00
04/25/19	ASH	Telephone Call(s) w/Client Telephone calls with Trey Rogers regarding factual issues	.20	152.00
04/25/19	ASH	Preparation of Note of issue Prepare Amended Notice of Arbitration	8.30	6,308.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 239

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/25/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone calls with Adam Silverstein regarding Amended Notice of Arbitration	.30	228.00
04/25/19	ASH	Examine Documents Background documents relating to Notice of Arbitration	1.10	836.00
04/25/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone calls with Karthik Bhavaraju and Alois Chakabva regarding factual issues	.20	152.00
04/25/19	ASH	Correspondence w/CoCounsel - Other to Karthik Bhavaraju; Alois Chakabva and Trey Rogers regarding factual issues (13)	.50	380.00
04/25/19	ASH	Analysis of Note of issue Review comments on Amended Notice of Arbitration from numerous parties	1.10	836.00
04/25/19	ACS	Review/correct Legal Papers Edit amended notice of arbitration	9.70	8,390.50
04/25/19	WMM	Legal services/Legal Papers Reviewing Amended Notice of Arbitration to be filed tomorrow in Cohen Reznik case.	.70	556.50
04/26/19	ASH	Preparation of Note of issue Amended Notice of Arbitration	8.10	6,156.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 240

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/26/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone calls with Karthik Bhavaraju and Alois Chakabva regarding factual issues	.40	304.00
04/26/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone calls with Adam Silverstein regarding Amended Notice of Arbitration	1.20	912.00
04/26/19	ASH	Examine Documents Documents relating to Amended Notice of Arbitration	.90	684.00
04/26/19	ASH	Correspondence w/Arbitration tribunal to arbitrators submitting Amended Notice of Arbitration	.20	152.00
04/26/19	ASH	Correspondence w/CoCounsel - Other with Karthik Bhavaraju and Alois Chakabva regarding issues relating to Amended Notice of Arbitration	.40	304.00
04/26/19	ASH	Analysis of Note of issue Revisions to Amended Notice of Arbitration from ACS	.70	532.00
04/26/19	ACS	Review/correct Legal Papers Final edits on amended notice of arbitration	1.30	1,124.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 241

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/26/19	GSL	Preparation of Complaint Review/preparation of Amended Demand for Arbitration with ASH for filing	5.50	1,622.50
04/27/19	ASH	Analysis of Note of issue Amended Notice of Defense served by party to arbitration	.20	152.00
04/28/19	ASH	Research re Legal Papers Legal research regarding legal issue relating to claims	.50	380.00
04/29/19	ASH	Correspondence w/Adversary to opposing counsel in arbitration regarding discovery issues	.40	304.00
04/30/19	ASH	Telephone Call(s) w/Client Telephone call with Trey Rogers regarding discovery from opposing counsel	.30	228.00
04/30/19	ASH	Correspondence w/Adversary To Skadden regarding First Amended Complaint and 502(d) Order (3); review background documents regarding same	.40	304.00
04/30/19	ASH	Correspondence w/Adversary to opposing counsel in arbitration regarding issues relating to discovery issues; review documents and correspondence related to same	1.10	836.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 242

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/30/19	ASH	Correspondence w/Client to Trey Rogers regarding discovery issue	.20	152.00
04/30/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon auditing standards expert	.20	173.00
05/01/19	ASH	Review/correct Legal Papers Retention agreement with assistant to expert	.50	380.00
05/02/19	ASH	Preparation of Legal Papers Prepare chart of retainer agreements for motion for expert retention's	.80	608.00
05/02/19	ASH	Correspondence w/CoCounsel - Other to assistant to expert regarding retention agreement; analyze background documents regarding same	.60	456.00
05/02/19	ASH	Review/correct Legal Papers Retention agreement with assistant to auditing standards expert	.40	304.00
05/02/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with ACS regarding current status of matter	.40	304.00
05/03/19	CMO	Review file re Resp to disc. device Re: productions in arbitration	.20	59.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 243

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/03/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with ACS and forensic expert regarding auditor arbitration	1.80	1,368.00
05/03/19	ASH	Telephone Call(s) w/CoCounsel - Other with assistant to expert regarding issues relating to document production	.20	152.00
05/03/19	ASH	Examine Documents Document productions made by respondent in arbitration	.60	456.00
05/03/19	ACS	Conference(s) w/ CoCounsel - Other Meet with forensic expert and ASH in auditor arbitration	1.80	1,557.00
05/03/19	ACS	Review/correct Correspondence Further edit engagement letter with forensic expert	.50	432.50
05/03/19	JKH	Review Documents Reviewing and copying productions to send to examiner	1.10	324.50
05/03/19	JKH	Review Documents Reviewing and editing document production index	.30	88.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 244

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/05/19	ASH	Preparation of Legal Papers List of search terms for substantive review of documents produced; review documents regarding same	2.60	1,976.00
05/06/19	ASH	Preparation of Legal Papers List of search terms for case analysis	2.40	1,824.00
05/06/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with ACS; Alan Diamond and Lon Seidman; meet with ACS regarding same	.60	456.00
05/06/19	ASH	Preparation of Subpoena Subpoena to BDO	.60	456.00
05/06/19	ASH	Telephone Call(s) w/CoCounsel - Other Alois Chakabva regarding factual issues	.10	76.00
05/06/19	ASH	Correspondence w/CoCounsel - Other Assistant to auditing standards expert regarding factual issues	.30	228.00
05/06/19	ASH	Research re Resp-ntc of disc-insp. Legal issue relating to discovery issue	.90	684.00
05/06/19	ASH	Examine Documents Analyze documents relating to substantive issues and search terms	2.40	1,824.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 245

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/06/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon A Diamond and L Seidman re arbitration	.60	519.00
05/07/19	ASH	Telephone Call(s) w/CoCounsel - Other With assistant to auditing standards expert candidate regarding workpapers	.50	380.00
05/07/19	ASH	Examine Documents analyze numerous documents regarding factual issues	2.10	1,596.00
05/07/19	ASH	Correspondence w/CoCounsel - Other To Karthik Bhavaraju and Alois Chakabva regarding materials relating to audits	.20	152.00
05/07/19	ASH	Correspondence w/CoCounsel - Other to assistant to auditor expert candidate regarding background facts and materials	.20	152.00
05/07/19	ASH	Examine Documents organizational charts	.30	228.00
05/07/19	ASH	Examine Documents prepare lists of search terms; run sample searches regarding same	1.90	1,444.00
05/07/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon auditing expert's staff	.50	432.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 246

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/08/19	ASH	Research re Legal Papers Legal research regarding discovery issue	2.40	1,824.00
05/08/19	ASH	Examine Documents searches for materials relevant to action	2.40	1,824.00
05/08/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS regarding searches for arbitration	.50	380.00
05/08/19	ACS	Review/correct Correspondence Edit engagement letter for damages/valuation/forensic expert	.10	86.50
05/08/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH re searches of docs for arbitration	.50	432.50
05/09/19	ASH	Telephone Call(s) w/CoCounsel - Other Trey Rogers and ACS regarding depositions	.20	152.00
05/09/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with assistant to accounting standards expert candidate's regarding depositions	.60	456.00
05/09/19	ASH	Telephone Call(s) w/CoCounsel - Other with Trey Rogers regarding discovery	.20	152.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 247

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/09/19	ASH	Examine Documents Review documents online; run searches	2.30	1,748.00
05/09/19	ASH	Correspondence w/CoCounsel - Other Karthik Bhavaraju and Alois Chakabva regarding discovery	.20	152.00
05/09/19	ACS	Correspondence w/Adversary Draft e-mail to J Bernard and D Cheifetz re depositions in arbitration	.20	173.00
05/09/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon auditing standards expert's staff	.60	519.00
05/09/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon T. Rogers re arbitration	.20	173.00
05/09/19	GSL	Document Review Document Review - Relativity	1.60	472.00
05/10/19	ASH	Correspondence w/Adversary to opposing counsel in arbitration regarding document discovery	2.60	1,976.00
05/10/19	ASH	Research re Legal Papers Legal research regarding discovery issue	.40	304.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 248

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/10/19	ASH	Examine Documents analyze background documents regarding discovery issue	1.10	836.00
05/10/19	ACS	Correspondence w/CoCounsel - Other Edit e-mail to J Bernard and D Cheifetz re workpapers	.80	692.00
05/11/19	ASH	Examine Documents Workpapers as produced and related correspondence; e-mails to Adam Silverstein regarding same	.30	228.00
05/11/19	ASH	Analysis of Resp-ntc of disc-insp. Analyze respondents' response to discovery requests	.10	76.00
05/11/19	ACS	Review/correct Correspondence Further edit e-mail to J. Bernard re turnover of workpapers in native format	2.20	1,903.00
05/13/19	ASH	Correspondence w/Adversary to opposing counsel in arbitration regarding issues regarding discovery issue	1.90	1,444.00
05/13/19	ASH	Correspondence w/CoCounsel - Other Cos Borelli regarding possible discovery	.10	76.00
05/13/19	ASH	Analysis of Subpoena Jack Gordon regarding sample subpoena	.10	76.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 249

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/13/19	ASH	Preparation of Subpoena Prepare subpoena to auditor; review background documents regarding same	2.80	2,128.00
05/13/19	ASH	Correspondence w/Client to Trey Rogers regarding document productions	.10	76.00
05/13/19	ACS	Correspondence w/Adversary Edit e-mails to J Bernard and D Cheifetz re the reproduction of audit workpapers and the scheduling of depositions	.80	692.00
05/13/19	WMM	Legal services/Legal Papers Attention to draft documents request to SHIP and communications concerning same	.50	397.50
05/14/19	ASH	Telephone Call(s) w/CoCounsel - Other With Adam Silverstein regarding Answer served by respondent and theories of case	.50	380.00
05/14/19	ASH	Conference(s) w/ CoCounsel - Other with Adam Silverstein regarding strategy	.30	228.00
05/14/19	ASH	Analysis of Arbitration statement Respondents' Notice of Defense and related documents	.20	152.00
05/14/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS and GSL re arbitration status and strategy	.60	456.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 250

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/14/19	ASH	Review/correct Subpoena Subpoena to auditor	2.30	1,748.00
05/14/19	ASH	Correspondence w/CoCounsel - Other to auditing standards expert candidate and assistant to auditing standards expert candidate regarding Notice of Defense	.10	76.00
05/14/19	ASH	Analysis of Correspondence Correspondence from opposing counsel regarding depositions	.10	76.00
05/14/19	ASH	Analysis of Legal Papers Factual research regarding identity of auditor addresses and affiliates	.30	228.00
05/14/19	ASH	Examine Documents Opposing party's production	.40	304.00
05/14/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and GSL re arbitration status and strategy	.60	519.00
05/14/19	ACS	Analysis of Answer Review arbitration answer and supporting documents (.8) and meet with ASH and telecon T. Rogers re same (.8)	1.60	1,384.00
05/14/19	GSL	Conference(s) In Office Meeting with ACS and ASH to discuss document review	.40	118.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 251

October 17, 2019  
BILL NO. 205506

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/15/19 ASH	Preparation of Legal Papers Notice of Subpoena to auditor	.50	380.00
05/15/19 ASH	Telephone Call(s) w/Adversary Michael Merrick regarding BBIHL; e-mail to team regarding same	.30	228.00
05/15/19 ASH	Examine Documents Analyze documents produced by respondent	2.60	1,976.00
05/15/19 ASH	Review/correct Subpoena Subpoena to auditor	1.50	1,140.00
05/15/19 ASH	Analysis of Legal Papers to Trey Rogers requesting documentation and information	.70	532.00
05/15/19 ASH	Analysis of Correspondence Between ACS and opposing counsel regarding discovery dispute	.10	76.00
05/15/19 ACS	Preparation of Correspondence Draft response to J. Bernard re depositions to be taken in arbitration	.90	778.50
05/15/19 ACS	Review/correct Correspondence Edit response to J. Bernard	.20	173.00
05/15/19 GSL	Document Review Continued document review	2.60	767.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 252

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/16/19	ASH	Examine Documents Analyze documents located in searches in arbitration	1.60	1,216.00
05/16/19	ASH	Telephone Call(s) w/CoCounsel - Other with assistant to auditing standards expert candidate regarding discovery	.30	228.00
05/16/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS regarding next steps	.20	152.00
05/16/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and telecon auditing standards staff (.3) and meet with ASH re arbitration strategy and next steps (.2)	.50	432.50
05/16/19	GSL	Document Review Continued document review	.90	265.50
05/17/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS and GSL regarding strategy	1.30	988.00
05/17/19	ASH	Telephone Call(s) w/CoCounsel - Other With ACS and Trey Rogers regarding factual background	.50	380.00
05/17/19	ASH	Examine Documents Review documents obtained in Relativity searches	2.10	1,596.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 253

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/17/19	ASH	Research re Resp-ntc of disc-insp. Review caselaw regarding discovery-related issue	.30	228.00
05/17/19	ASH	Correspondence w/Adversary To opposing counsel regarding form of production of workpapers; review background documents regarding same	.20	152.00
05/17/19	ASH	Examine Documents Bills and time records from auditor; e-mail to Trey Rogers regarding same	.30	228.00
05/17/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and GSL re arbitration strategy	1.30	1,124.50
05/17/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon T. Rogers re criminal trial update	.50	432.50
05/17/19	GSL	Analysis/Strategy Preparation for meeting with ACS and ASH - re results of document review	.40	118.00
05/17/19	GSL	Conference(s) In Office Meeting with ACS and ASH - re results of document review	1.20	354.00
05/17/19	GSL	Analysis/Strategy Research on standing	1.20	354.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 254

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/18/19	ASH	Examine Documents Analyze documents produced by the Receiver on Relativity for important documents	2.20	1,672.00
05/19/19	ASH	Analysis of Legal Papers Analyze documents produced by respondent	2.30	1,748.00
05/19/19	GSL	Document Review Continued document review	.70	206.50
05/20/19	ASH	Telephone Call(s) w/CoCounsel - Other with auditing standards expert candidate; assistant to auditing standards expert and ACS regarding scope of services and related issues	.70	532.00
05/20/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with proposed damages and causation expert and ACS	1.80	1,368.00
05/20/19	ASH	Telephone Call(s) w/CoCounsel - Other Trey Rogers regarding factual matters and witnesses; e-mail to ACS summarizing same	.70	532.00
05/20/19	ASH	Research re Arbitration statement Caselaw regarding legal issue raised by respondent in response to Notice of Arbitration	.40	304.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 255

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/20/19	ACS	Conference(s) w/ CoCounsel - Other Meet with forensic/valuation/damages expert	1.80	1,557.00
05/20/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon auditing standards expert and ASH	.70	605.50
05/20/19	GSL	Analysis/Strategy Prepared summary of research on standing for ACS and ASH	1.80	531.00
05/21/19	ASH	Telephone Call(s) w/CoCounsel - Other With representatives of CaseWare regarding issues relating to workpapers	.40	304.00
05/21/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with Trey Rogers and ACS regarding criminal proceedings	.40	304.00
05/21/19	ASH	Correspondence w/Adversary to opposing counsel in arbitration (2)	.40	304.00
05/21/19	ASH	Examine Documents Initial disclosures from Beechwood litigation regarding potential witnesses; list of largest portfolio investments; materials from Trey Rogers regarding potential witnesses	.50	380.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 256

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/21/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call Trey Rogers re arbitration witnesses and status of criminal trial	.50	380.00
05/21/19	ASH	Preparation of Legal Papers List of issues and witnesses	.50	380.00
05/21/19	ASH	Correspondence w/CoCounsel - Other to assistant to auditing standards expert candidate regarding review of workpapers; to CaseWare regarding software	.40	304.00
05/21/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon T. Rogers re arbitration witnesses and status of criminal trial developments	.50	432.50
05/21/19	ACS	Analysis of Correspondence Draft e-mail to J. Bernard	.40	346.00
05/21/19	ACS	Analysis of Correspondence Draft follow up e-mail to J. Bernard	.50	432.50
05/21/19	ACS	Conference(s) w/ CoCounsel - Other Meeting with T. Rogers re further debrief on criminal proceedings and impact on Arbitration	.50	432.50
05/22/19	ASH	Correspondence w/Adversary opposing counsel regarding depositions	.20	152.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 257

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/22/19	ACS	Review/correct Correspondence Revise e-mail to J. Benard re witness list	.40	346.00
05/22/19	ACS	Research re Opposing brief for motion Review legal research re Wagoner's application in arbitration	.40	346.00
05/22/19	ACS	Research re Opposing brief for motion Meet with ASH re legal argument	.40	346.00
05/22/19	ACS	Correspondence w/Adversary E-mails from/tl J. Bernard re arbitration	.40	346.00
05/23/19	ASH	Research re Legal Papers Analyze CPR discovery rules and protocols regarding discovery issues	.30	228.00
05/23/19	ASH	Research re Legal Papers Legal research regarding subpoena power of arbitration panel; e-mail to arbitration panel regarding same	1.80	1,368.00
05/23/19	ASH	Examine Documents Files produced by opposing counsel	.40	304.00
05/23/19	ACS	Conference(s) w/ CoCounsel - Other Meet with Receiver re S&W; arbitration; expert protocol motion and Black Elk bankruptcy case	1.30	1,124.50



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 258

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/23/19	ACS	Research re Correspondence Review CPR arbitration rules re discovery issues	.20	173.00
05/23/19	ACS	Research re Correspondence Research re prehearing subpoena power of arbitration panel	.50	432.50
05/23/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH re arbitration discovery strategy	.50	432.50
05/23/19	ACS	Correspondence w/CoCounsel - Other E-mail to accounting standards expert staff	.10	86.50
05/23/19	GSL	Document Review Continued document review	.40	118.00
05/23/19	JKH	Review Documents Reviewing documents sent back from strategic	.50	147.50
05/24/19	ASH	Telephone Call(s) w/CoCounsel - Other ACS and opposing counsel in arbitration regarding depositions in arbitration	.40	304.00
05/24/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with assistant to auditing standards expert	.30	228.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 259

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/24/19	ASH	Telephone Call(s) w/CoCounsel - Other Adam Silverstein regarding telephone call with opposing counsel	.10	76.00
05/24/19	ASH	Correspondence w/CoCounsel - Other to Trey Rogers regarding documents needed; review background documents regarding same	.50	380.00
05/24/19	ASH	Examine Documents Analyze workpapers on CaseWare	.60	456.00
05/24/19	ASH	Correspondence w/CoCounsel - Other to assistant to auditing expert candidate	.20	152.00
05/24/19	ACS	Correspondence w/CoCounsel - Other Telecon auditing standards expert staff	.40	346.00
05/24/19	ACS	Correspondence w/Adversary Telecon J. Bernard and D. Cheifetz re depositions	.40	346.00
05/24/19	GSL	Document Review Continued document review	.60	177.00
05/24/19	JKH	Correspondence Preparing letter and sending flash drive to fact consultant	.50	147.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 260

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/28/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS and Receiver regarding arbitration	.20	152.00
05/28/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and Receiver re depositions in arbitration	.20	173.00
05/28/19	ACS	Correspondence w/Adversary E-mail to J. Bernard and D. Cheifetz re depositions	.10	86.50
05/29/19	ASH	Examine Documents Documents regarding scheduling; correspondence between Adam Silverstein and opposing counsel regarding scheduling	.20	152.00
05/29/19	ACS	Correspondence w/CoCounsel - Other E-mail to/from J. Bernard re arbitration discovery and schedule	.20	173.00
05/29/19	ACS	Analysis of Complaint Review Beechwood amended complaint re:conforming with arbitration allegations	.50	432.50
05/30/19	ACS	Correspondence w/CoCounsel - Other E-mails to experts regarding entry of order approving protocols	.30	259.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 261

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/30/19	ACS	Correspondence w/CoCounsel - Other E-mails to experts regarding scheduling changes	.20	173.00
05/31/19	ASH	Conference(s) w/ CoCounsel - Other Trey Rogers regarding documents needed; update of criminal trial; and document productions	.30	228.00
05/31/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon valuation/forensic expert	.20	173.00
06/03/19	ASH	Conference(s) w/ Adversary counsel for auditor regarding subpoena	.50	380.00
06/03/19	ASH	Telephone Call(s) w/CoCounsel - Other with audit standards expert; assistant to audit standards expert. and ACS	1.00	760.00
06/03/19	ASH	Correspondence w/CoCounsel - Other to auditing standards expert regarding additional materials	.20	152.00
06/03/19	ACS	Correspondence w/CoCounsel - Other E-mail to auditing standards expert	.10	86.50
06/03/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon auditing standards experts	1.00	865.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 262

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/03/19	JKH	Review Documents Reviewing and profiling confidentiality orders	.20	59.00
06/06/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with ACS regarding issues relating to arbitration	.50	380.00
06/06/19	ACS	Telephone Call(s) w/Adversary Telecon D Cheifetz	.20	173.00
06/06/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH re arbitration status and strategy	.50	432.50
06/07/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone conference with damages expert and representatives of Goldin Associates regarding arbitration	.50	380.00
06/07/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone conference with Trey Rogers and ACS regarding arbitration	1.40	1,064.00
06/07/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon T Rogers re arbitration	1.40	1,211.00
06/07/19	ACS	Analysis of Correspondence Review e-mail from D Cheifetz re damages	.10	86.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 263

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/07/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecom valuation; damages; forensic expert and staff	.50	432.50
06/13/19	ASH	Memorandum to CoCounsel - Other Meet with forensic valuation and damages expert and team	2.20	1,672.00
06/13/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS regarding arbitration	.60	456.00
06/13/19	ACS	Conference(s) w/ CoCounsel - Other Meet with forensic/valuation/damages expert and team	2.20	1,903.00
06/13/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH re arbitration	.60	519.00
06/14/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with ACS; auditing standards consultant and assistant to auditing standards consultant	.50	380.00
06/14/19	ASH	Telephone Call(s) w/CoCounsel - Other with ACS regarding issues relating to arbitration	.20	152.00
06/14/19	ASH	Examine Documents Private Placement Memos	.50	380.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 264

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/14/19	ACS	Conference(s) w/ CoCounsel - Other Meet with T Roger and A Chakabva re response to damages inquiry	.50	432.50
06/14/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon M Dorrs for PPVA re auditing standards expert	.30	259.50
06/17/19	ASH	Correspondence w/Adversary to opposing counsel in arbitration regarding discovery	.10	76.00
06/17/19	ASH	Research re Opposing brief for motion Legal research regarding in pari delicto defense	.80	608.00
06/17/19	ASH	Analysis of Legal Papers Private placement memorandum	.20	152.00
06/17/19	ASH	Analysis of Correspondence Review recent correspondence with experts and opposing counsel in arbitration	.20	152.00
06/17/19	ACS	Correspondence w/Adversary E-mail to D. Cheifetz	.20	173.00
06/17/19	ACS	Correspondence w/CoCounsel - Other E-mails to auditing standards expert	.20	173.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 265

October 17, 2019  
BILL NO. 205506

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/17/19 GSL	Analysis/Strategy Research - in pari delicto	.70	206.50
06/18/19 ASH	Examine Documents Review documents produced by the Receiver in arbitration	.90	684.00
06/18/19 ASH	Research re Legal Papers Legal research regarding in pari delicto	.80	608.00
06/18/19 ASH	Telephone Call(s) w/CoCounsel - Other With Alois Chakabva regarding opposing party's request for information	.20	152.00
06/18/19 ASH	Preparation of Legal Papers Prepare chart regarding production	.70	532.00
06/18/19 ASH	Correspondence w/CoCounsel - Other to Alois Chakabva regarding arbitration	.20	152.00
06/18/19 GSL	Analysis/Strategy Continued research on in pari delicto	3.30	973.50
06/19/19 ASH	Examine Documents Run searches for hits on key CohnReznick personnel; prepare revised chart regarding results of same	.60	456.00



OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 266

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/20/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with ACS regarding arbitration status and strategy	.80	608.00
06/20/19	ASH	Examine Documents Review documents for production to opposing counsel in arbitration	.90	684.00
06/20/19	ASH	Correspondence w/Arbitration tribunal Letter to arbitration tribunal regarding scheduling; review background documents regarding same	2.40	1,824.00
06/20/19	ASH	Correspondence w/CoCounsel - Other To Kevin Melfi and Trey Rogers regarding production of documents	.30	228.00
06/20/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone calls with Trey Rogers regarding document productions	.30	228.00
06/20/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH re arbitration status and strategy	.80	692.00
06/20/19	ACS	Correspondence w/CoCounsel - Other E-mail to auditing standards expert	.10	86.50
06/20/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon T Rogers re arbitration scheduling	.10	86.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 267

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/20/19	ACS	Correspondence w/Adversary E-mails to/from D Cheifetz re arbitration	.20	173.00
06/20/19	JKH	Review Documents Arbitration - reviewing document production and coordinating with strategic to place documents in workspace	.40	118.00
06/21/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone calls with Trey Rogers regarding document productions	.30	228.00
06/21/19	ASH	Examine Documents Review documents for production to opposing party in arbitration	3.30	2,508.00
06/21/19	ASH	Review/correct Correspondence revise joint letter to arbitrators regarding issues regarding scheduling	.40	304.00
06/21/19	ASH	Correspondence w/CoCounsel - Other To Kevin Melfi regarding document productions	.20	152.00
06/21/19	ASH	Correspondence w/Adversary to opposing counsel in arbitration regarding document productions	.30	228.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 268

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/21/19	ACS	Review/correct Correspondence Edit letter to Panel re arbitration re status update and requested scheduling change	3.60	3,114.00
06/21/19	ACS	Correspondence w/Adversary E-mail to J Bernard and D Cheifetz re arbitration	.10	86.50
06/21/19	GSL	Analysis/Strategy Continued research - re defenses	.70	206.50
06/24/19	ASH	Attendance at Trial Observe criminal trial	4.10	3,116.00
06/24/19	ASH	Analysis of Correspondence Revise drafts of letter to arbitration panel regarding status and scheduling from ACS and opposing counsel in arbitration	.20	152.00
06/24/19	ACS	Review/correct Correspondence Review D. Cheifetz revisions to draft letter re status and requested scheduling changes to arbitration panel and further edit	.40	346.00
06/24/19	ACS	Correspondence w/Adversary E-mail to D. Cheifetz re arbitration	.10	86.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 269

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/24/19	ACS	Review/correct Correspondence Further revise letter to panel re status and requested scheduling change	.50	432.50
06/25/19	ASH	Correspondence w/Arbitration tribunal Revise and finalize copy of letter to arbitration panel regarding status and scheduling; review background documents regarding same	1.20	912.00
06/25/19	ASH	Correspondence w/Adversary with opposing counsel in arbitration regarding possible changes to letter to arbitration panel; review background documents regarding same	.10	76.00
06/26/19	ASH	Analysis of Memorandum from GSL regarding in pari delicto	.20	152.00
06/26/19	ASH	Analysis of Brief for motion Memorandum of Law in Support of Motion for Summary Judgment filed by respondents in arbitration	1.50	1,140.00
06/26/19	ASH	Analysis of Brief for motion Statement of Undisputed Facts in support of Motion for Summary Judgment filed by respondents in arbitration	.90	684.00
06/26/19	ASH	Correspondence w/Adversary to opposing counsel responding to request for information regarding damages	1.20	912.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 270

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/26/19	GSL	Analysis/Strategy Reviewed motion for summary judgment	1.00	295.00
06/26/19	JKH	Review Documents Reviewing document productions and updating chart	.40	118.00
06/26/19	JKH	Analyze Documents Preparing copies of document productions	.20	59.00
06/27/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS and GSL regarding opposition to motion for summary judgment filed by respondents in arbitration	2.50	1,900.00
06/27/19	ASH	Examine Documents review documents relating to facts matters bearing on dispositive motion filed by respondents in arbitration	1.30	988.00
06/27/19	ACS	Analysis of Legal Papers Review and annotate auditors' dispositive motion papers	2.60	2,249.00
06/27/19	ACS	Conference(s) w/ CoCounsel - Other Meet with GSL and ASH re response to dispositive motion	2.50	2,162.50
06/27/19	GSL	Conference(s) In Office Meeting with ACS and ASH - re motion for summary judgment	2.40	708.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 271

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/27/19	JKH	Analyze Documents Preparing electronic copies of 6/21 production	.30	88.50
06/28/19	ASH	Telephone Call(s) w/CoCounsel - Other With auditing standards expert; assistant to auditing standards expert and ACS regarding arbitration	1.10	836.00
06/28/19	ASH	Examine Documents Background documents relating to opposition to motion for summary judgment filed by respondents in arbitration	1.10	836.00
06/28/19	ASH	Analysis of Correspondence from arbitrators; opposing counsel and ACS regarding issues relating to hearing on motion for summary judgment (4)	.20	152.00
06/28/19	ACS	Analysis of Legal Papers Review and annotate engagement letters; org. charts; management agreements; PPCO and PPVA financial statements and PPMs to respond to dispositive motion	2.60	2,249.00
06/28/19	ACS	Correspondence w/CoCounsel - Other E-mail from B Leber re Panel ruling on scheduling request	.10	86.50
06/28/19	ACS	Correspondence w/Adversary E-mail to D Cheifetz and J Bernard re scheduling	.10	86.50

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 272

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/28/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon auditing expert	1.10	951.50
06/28/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon T. Rogers re summations in criminal proceeding	.30	259.50
06/28/19	GSL	Analysis/Strategy Prepared folder with research materials	2.40	708.00
06/28/19	JKH	Analyze Documents Review of Statement of Undisputed Facts	.40	118.00
06/29/19	ASH	Correspondence w/Adversary Regarding response to opposing counsel regarding damages	1.10	836.00
06/29/19	ASH	Examine Documents documents regarding Black Elk Transactions	.80	608.00
06/29/19	ACS	Preparation of Opposing brief for motion Research re hedge fund governance and review master fund operating agreement to respond to dispositive motion	1.20	1,038.00
06/29/19	ACS	Preparation of Opposing brief for motion Review case and underlying briefs to respond to dispositive motion	1.20	1,038.00

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 273

October 17, 2019  
BILL NO. 205506

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/30/19	ASH	Preparation of Opposing brief for motion Prepare Memorandum of Law in Opposition to Respondent's Motion for Summary Judgment	3.20	2,432.00
06/30/19	ASH	Preparation of Legal Papers Review cases relating to motion for summary judgment filed by respondents in arbitration	1.30	988.00
06/30/19	ACS	Preparation of Opposing brief for motion Review decisions and underlying briefs to respond to dispositive motion	1.60	1,384.00
06/30/19	ACS	Preparation of Opposing brief for motion Review 6/21/19 Rakoff PPVA decision to respond to dispositive motion	.50	432.50
06/30/19	GSL	Analysis/Strategy Research - re hedge funds	.60	177.00
06/30/19	GSL	Analysis/Strategy Summary of cases cited in motion for summary judgement	1.20	354.00
TOTAL PHASE P15			406.30	\$292,000.00
			TOTAL FOR SERVICES	\$1,218,824.50



# **EXHIBIT F**

## Expense Summary

**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE  
STATEMENT PERIOD OF  
APRIL 1, 2019 THROUGH JUNE 30, 2019**

Expense Category	Service Provider (if applicable)	Total Expenses <sup>1</sup>
Air Freight (Overnight Courier)	Federal Express	\$356.88
Conference Calls	West Unified (conference call service)	\$3,651.50
Copies, Certified		\$13.00
Corporation Service		\$60.08
Court Reporting Services		\$859.16
Electronic Research	Westlaw, Pacer	\$7,802.72
Filing Fees, Court		\$231.00
Laser Copies (\$.15 per page)		\$2,884.05
Miscellaneous		\$452.83
Photocopies (\$.15 per page)		\$657.60
Postage, Excess		\$34.05
Process Service	Preemptive Process Server, TSI Legal	\$70.00
Telephone Calls (Tolls Only)		\$70.00
<b>TOTAL:</b>		<b>\$17,142.87</b>

<sup>1</sup> The date that appears on the annexed disbursement detail associated with a particular disbursement is as to certain disbursements (e.g., messenger) the date the disbursement is recorded in Otterbourg computer records and not the actual date the disbursement was incurred.

# **EXHIBIT G**

## Receiver Expense Records

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901  
Page 17

November 26, 2019  
BILL NO. 206576

DISBURSEMENTS FOR YOUR ACCOUNT

Laser Copies	862.65
Photocopies	10.35
	<hr/>
TOTAL DISBURSEMENTS	873.00

# **EXHIBIT H**

## Otterbourg Expense Records

OTTERBOURG P.C.  
230 PARK AVENUE  
NEW YORK, NY 10169-0075

Client/Matter: 22126/0902  
Page 274

October 17, 2019  
BILL NO. 205506

DISBURSEMENTS FOR YOUR ACCOUNT

Laser Copies	2,021.40
Conference Call(s)	3,651.50
Court Reporting Services	859.16
Filing Fees, Court	231.00
Miscellaneous	452.83
Electronic Research	7,802.72
Copies, Certified	13.00
Air Freight	356.88
Postage, Excess	34.05
Process Service	70.00
Corporation Service	60.08
Telephone Calls (tolls only)	70.00
Photocopies	647.25
	<hr/>
TOTAL DISBURSEMENTS	16,269.87

# **EXHIBIT I**

## Certification

Melanie L. Cyganowski  
Adam C. Silverstein  
OTTERBOURG P.C.  
230 Park Avenue  
New York, New York 10169  
Telephone: (212) 661-9100  
Facsimile: (212) 682-6104

*Counsel to the Receiver*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X	
SECURITIES AND EXCHANGE COMMISSION,	:
	:
Plaintiff,	:
	:
-v-	:
PLATINUM MANAGEMENT (NY) LLC;	:
PLATINUM CREDIT MANAGEMENT, L.P.;	:
MARK NORDLICHT;	:
DAVID LEVY;	:
DANIEL SMALL;	:
URI LANDESMAN;	:
JOSEPH MANN;	:
JOSEPH SANFILIPPO; and	:
JEFFREY SHULSE,	:
	:
Defendants.	:
-----X	

No. 16-CV-6848 (BMC)

**CERTIFICATION IN SUPPORT OF EIGHTH JOINT INTERIM APPLICATION OF  
THE RECEIVER AND OTTERBOURG P.C. FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED DURING  
THE PERIOD APRIL 1, 2019 THROUGH JUNE 30, 2019**

I, Adam C. Silverstein (the "Certifying Professional"), hereby certify that Melanie L. Cyganowski (the "Receiver") and Otterbourg P.C. ("Otterbourg") have designated me as the Certifying Professional with respect to the Certification required by Section A of the Billing



Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission (the “SEC Billing Guidelines”) and further certify that:

1. I am an attorney admitted to practice law in the Eastern District of New York since November, 1993 and in the State of New York since May, 1993 and am a partner at Otterbourg.

2. I have read the Eighth Joint Interim Application of the Receiver and Otterbourg P.C. for Allowance of Compensation and Reimbursement of Expenses Incurred during the Period April 1, 2019 through June 30, 2019 (the “Eighth Interim Application”).

3. To best of my knowledge, information, and belief formed after reasonable inquiry, the Eighth Interim Application and all fees and expenses sought therein are true and accurate and comply with the SEC Billing Guidelines, except as noted:

(a) Otterbourg has made every reasonable effort to insure that all billing professionals placed all related time entries in a single activity category (designated by task code). However, some variations may have occurred. Where multiple tasks within a particular task code occurred on the same day, those tasks were recorded as one entry.

4. All fees contained in the Eighth Interim Application are based on the rates listed in the Fee Schedule (Exhibit B to the Application), subject to the discounts described in the Eighth Interim Application, and all such fees are reasonable, necessary, and commensurate with the skill and experience required for the activity performed.

5. All necessary and reasonable expenses contained in the Eighth Interim Application are based on the actual cost incurred by Otterbourg. Otterbourg has not included in the amounts for which expense reimbursement is sought any amortization of the cost of any

investment, equipment, or capital outlay (except to the extent any such amortization is included within the permitted allowable amounts for photocopies and fax transmission).

6. In seeking reimbursement for an outside vendor service, which Otterbourg justifiably purchased or contracted for from a third party (such as court reporting services, electronic research, and overnight courier), Otterbourg requests reimbursement only for the actual amount billed to Otterbourg by the third party vendor and paid by Otterbourg to such vendor. Neither the Receiver nor Otterbourg is making a profit on such reimbursable service.

7. I represent that (i) the fees and expenses included therein were incurred in the best interests of the Receivership Estate; and, (ii) with the exception of the SEC Billing Guidelines, the Receiver has not entered into any agreement, written or oral, express or implied, with any person or entity concerning the amount of compensation paid or to be paid from the Receivership Estate, or any sharing thereof.

Dated: November 26, 2019

/s/ Adam C. Silverstein  
Adam C. Silverstein  
Certifying Professional

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
SECURITIES AND EXCHANGE COMMISSION, :

Plaintiff, :

-v- :

No. 16-cv-6848 (BMC)

PLATINUM MANAGEMENT (NY) LLC; :  
PLATINUM CREDIT MANAGEMENT, L.P.; :  
MARK NORDLICHT; :  
DAVID LEVY; :  
DANIEL SMALL; :  
URI LANDESMAN; :  
JOSEPH MANN; :  
JOSEPH SANFILIPPO; and :  
JEFFREY SHULSE, :

Defendants. :

-----X

**[PROPOSED] ORDER APPROVING EIGHTH JOINT INTERIM APPLICATION  
OF THE RECEIVER AND OTTERBOURG P.C. FOR ALLOWANCE OF  
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED DURING  
THE PERIOD APRIL 1, 2019 THROUGH JUNE 30, 2019**

THIS MATTER coming before the Court on the Eighth Joint Interim Application of Melanie L. Cyganowski, the duly appointed receiver herein (the “Receiver”) and Otterbourg P.C. (“Otterbourg”), counsel for the Receiver, for Allowance of Compensation and Reimbursement of Expenses Incurred During the Period April 1, 2019 Through June 30, 2019 (the “Eighth Interim Application”)<sup>1</sup> [Dkt. No. \_\_\_\_]; and the Court having considered the Eighth Interim Application and exhibits and other documents filed in support of the Eighth Interim Application; and the Court having found that the Eighth Interim Application complies with applicable standards for awarding fees and expenses; and after due deliberation and for good and sufficient cause shown; it is hereby

<sup>1</sup> Capitalized terms utilized but not otherwise defined herein shall have the meaning ascribed to them in the Eighth Interim Application.

**ORDERED** that the Eighth Interim Application for the period covering April 1, 2019 through June 30, 2019 (the “Eighth Application Period”) is granted; and it is further

**ORDERED** that the Receiver’s compensation for the Eighth Application Period is allowed on an interim basis in the amount of \$67,660.00 (the “Allowed Receiver Fees”); and it is further

**ORDERED** that the fees requested by Otterbourg for the Eighth Application Period are allowed on an interim basis in the amount of \$966,801.82 (the “Allowed Otterbourg Fees” and, together with the Allowed Receiver Fees, the “Allowed Fees”); and it is further

**ORDERED** that the Receiver’s request for reimbursement of her out-of-pocket expenses for the Eighth Application Period is allowed on an interim basis in the amount of \$873.00; and it is further

**ORDERED** that Otterbourg’s request for reimbursement of its out-of-pocket expenses for the Eighth Application Period is allowed on an interim basis in the amount of \$16,269.87; and it is further

**ORDERED** that the Receiver is authorized to immediately pay from the Receivership assets (i) the Allowed Fees, less the Holdback Amount, plus (ii) 100% of the allowed out-of-pocket expenses of Applicants.