

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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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. :

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No. 16-CV-6848 (BMC)

**NINTH JOINT INTERIM APPLICATION OF THE RECEIVER
AND OTTERBOURG P.C. FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES INCURRED DURING THE PERIOD
JULY 1, 2019 THROUGH AND INCLUDING SEPTEMBER 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 Ninth Joint Interim Application (the “Ninth Interim Application”) for Allowance of

Compensation and Reimbursement of Expenses Incurred During the Period from July 1, 2019 through and including September 30, 2019 (the “Ninth 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 \$44,337.20 and reimbursement of expenses in the amount of \$938.27 for the Ninth Application Period. Otterbourg requests interim approval of fees in the amount of \$1,038,220.95 and reimbursement of expenses in the amount of \$18,339.44 for the Ninth Application Period, for a combined total of fees for Applicants in the amount of \$1,082,558.15,¹ and expenses in the amount of \$19,277.71 for the Ninth Application Period.

This Ninth Interim Application contains the following sections:

Section I provides a preliminary statement of the Receiver’s activities during the Ninth 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 of each exhibit to this Ninth Interim Application and the reduction in fees agreed to in connection with the appointment of the Receiver.

¹ 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 Ninth Application Period, the Receiver’s recorded time charges before application of these accommodations were \$69,625.00 and Otterbourg’s recorded time charges were \$1,328,139.00, for a combined gross legal fees total (before the application of any accommodations) of \$1,397,764.00.

Section III contains a narrative description of the work Otterbourg professionals performed on behalf of the Receiver during the Ninth 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 Ninth Application Period, the primary focus of the Receiver and her team² 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 finalized the disposition of one of the Receivership’s most problematic assets – LC Energy – and made significant progress towards bringing another one of its problematic assets – Arabella Exploration – to a conclusion.

² 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”).

A. Analysis and Disposition of Receivership Assets

During the Ninth Application Period, the Receiver (i) completed the sale of one portfolio asset (LC Energy LLP) that resulted in the limitation of potential liabilities with respect to the asset and (ii) settled a dispute over a litigation finance asset that resulted in the payment to Platinum of certain insurance proceeds (described below). The Receivership Team also participated in a successful mediation in Texas that resolved one of the last remaining issues so that the Arabella bankruptcy case can be closed and distributions made to creditors, including Platinum as its secured creditor. Both Arabella and LC Energy have been two of the more challenging assets in the Platinum portfolio. The Receiver continues to explore options for some of the smaller assets in the Platinum portfolio, but the Receiver is not anticipating any significant recoveries on account of the remaining non-litigation assets.

To assist the Receiver with the monetization of the assets, she retained Houlihan Lokey Capital, Inc. (“Houlihan Lokey”)³ and Conway MacKenzie Capital Advisors, LLC (“Conway MacKenzie”) shortly after her appointment.⁴ The services of both Houlihan Lokey and Conway MacKenzie have since concluded.

During the Ninth Application Period, the Platinum Receivership received approximately \$1.8 million from the settlement of a dispute with two insurance companies relating to the Accutane litigation finance investment. This amount is in addition to the approximately \$64.2 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

³ 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”).

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

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 were still in the developmental stage, had no established market value (with any future value being highly speculative) and, in some instances, required 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 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.

The Receiver at this time does not anticipate significant recoveries from the remaining non-litigation assets. While there may be a few assets in which recoveries on a smaller scale are possible, most of the remaining non-litigation assets in the portfolio 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 assets of the estate (the "Receivership Estate"). 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 Ninth Application Period and the work done during the Ninth Application Period with respect to those investments is set forth in Section IV of this Ninth Interim Application.

B. Administrative Matters

During the Ninth 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"),⁵ 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 website also includes links to the Beechwood Action docket.

⁵ 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.

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 Ninth 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.

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,⁶ Joseph Mann, Joseph San 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.

⁶ Uri Landesman passed away in September 2018.

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 Ninth 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 Status⁷

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

(a) As of September 30, 2019, the Receivership Entities had approximately \$37.7 million in funds. 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 September 30, 2019, accrued and unpaid administrative expenses amount to approximately \$5.5 million. This amount includes the estimate of fees and expenses that have been incurred by the Receiver, Otterbourg and Goldin during the second and third quarters of this year and that will be requested in future applications, 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 Ninth Application Period.

(b) Cash disbursements during the Ninth Application Period totaled approximately \$4.9 million. This amount consisted primarily of (i) \$4,037,597 in disbursements to professionals; (ii) \$517,613 in business asset expenses (payroll and related expenses paid to Platinum employees, as well as office rent); and (iii) \$427,053 in investment expenses (of this

⁷ 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.

amount, \$380,000 represents funds paid to the purchaser of LC Energy to avoid certain potential environmental liabilities and the balance represents funds used to preserve the pre-sale value of LC Energy).

Cash receipts during the Reporting Period totaled \$1,863,885. This amount primarily consists of net proceeds derived from the settlement of a dispute with two insurance companies relating to the litigation finance investment referred to as “Accutane,” which is discussed below.

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 \$37.7 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) Litigation claims.

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

(d) In addition to the asset specific lawsuits – namely, Lincoln National Insurance and Greehey (described below) – and PPCO’s interest in the lawsuit relating to Agera Energy, the Receiver’s investigation of pre-petition activities has to date 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. 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 primary focus of the Beechwood Action remains voiding of purported blanket liens on Platinum’s assets.

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 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 entered into tolling agreements and amended tolling agreements with potential targets 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 Ninth Application Period, the Receiver requests interim approval of her fees in the amount of \$44,337.20 and reimbursement of expenses in the amount of

\$938.27. Otterbourg requests interim approval of its fees in the amount of \$1,038,220.95 and reimbursement of expenses in the amount of \$18,339.44. Thus, the combined total of fees for Applicants of \$1,082,558.15, plus expenses of \$19,277.71, is \$1,101,835.86.

The Receiver has assembled a team of Otterbourg professionals to address different investments and different issues that may arise within each investment. 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 1st 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 \$69,625.00 to \$44,337.20, a reduction in the amount of \$25,287.80. Moreover, the recorded time charges for the Otterbourg professionals have been reduced from \$1,328,139.00 to \$1,038,220.95, a reduction in the amount of \$289,918.05. Therefore, the total reduction for legal fees incurred during the Ninth Application Period by the Receiver and Otterbourg professionals is \$315,205.85.

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 Ninth Interim Application to SEC counsel on November 22, 2019 to allow for a thirty-day review period and previously provided the SEC with its monthly time records.

This Ninth Interim Application includes certain exhibits:

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

(b) A Fee Schedule showing the total fees billed and hours worked during the Ninth 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 Ninth 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 Ninth 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 ninth 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 Ninth 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.

Eight attorneys and two paraprofessionals billed time during the Ninth Application Period (in addition to the Receiver).⁸ Because of the diversity of issues confronting the Receiver, this case necessitated the involvement of attorneys with background and experience in the multitude of litigation and transactional disciplines relevant to this 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 Ninth Application Period and their specific roles were as follows:

(a) Adam C. Silverstein (Partner) (.9 Hours to P01; 7.5 Hours to P04; .3 Hours to P10; 2.8 Hours to P14; 247.0 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 is the lead attorney responsible for the Arbitration and, therefore, most of his time during the Ninth Application Period was dedicated to matters relating to the Arbitration. Mr. Silverstein also assisted with applications to the Court and negotiations involving the S&W dispute (described below). Mr. Silverstein has also been one of the point persons regarding communications with the SEC during the Ninth Application Period.

⁸ The Receiver has voluntarily not billed the time of any professional that billed less than fifteen (15) hours to the case during the Ninth Application Period.

(b) William Moran (Partner) (.7 Hours to P01; 29.8 Hours to P02; 215.1 Hours to P14; 8.1 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 Ninth Application Period, as well as post-sale issues in connection with Abdala.

(c) Philip C. Berg (Partner) (6.4 Hours to P01; 50.8 Hours to P02; 3.7 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 Ninth 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. In Particular, during the Ninth Application Period, Mr. Berg assisted with the closing of the LC Energy Asset and with post-closing issues related to the prior sale of assets known as Abdala.

(d) Jennifer S. Feeney (Of Counsel) (26.9 Hours to P01; 31.5 Hours to P02; 44.0 Hours to P04; 5.2 Hours to P13; .5 Hours to P14) – Ms. Feeney is a senior member of Otterbourg’s bankruptcy department and provides specific bankruptcy-related counsel to the Receiver. During the Ninth Application Period, Ms. Feeney spent time with respect to the Arabella bankruptcy case, including attendance at the mediation in Texas to resolve one of the last remaining issues necessary to close the Arabella bankruptcy case. 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) (39.2 Hours to P01; 46.3 Hours to P02; 20.4 Hours to P04; 2.6 Hours to P10; 257.3 Hours to P14; 11.4 Hours to P15) – 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 Ninth Application Period in connection with argument in opposition to various motions to dismiss, preparing for depositions and other discovery matters including attention to preparation of the Receiver's expert report in the Beechwood Action.

(f) Andrew S. Halpern (Associate) (17.5 Hours to P10; 83.1 Hours to P14; 315.4 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 in connection with argument in opposition to various motions to dismiss, preparing for depositions and other discovery matters including attention to preparation of the Receiver's expert report in the Beechwood Action and the completion of document production in the Arbitration.

(g) Gabriela S. Leon (Associate) (4.1 Hours to P01; .6 Hours to P04; 186.1 Hours to P14; 169.6 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) Breahna S. Wright (Associate) (7.0 Hours to P01; 11.9 Hours to P04) – Ms. Wright is a junior associate in the litigation department. Ms. Wright assisted with the response to motions for indemnification made by certain former employees.

(i) Christine O'Brien (Paralegal) (1.9 Hours to P04; .5 Hours to P14; 14.3 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.

(j) Jessica Hildebrandt (Paralegal) (4.8 Hours to P01; 11.4 Hours to P04; 4.1 Hours to P10; 107.9 Hours to P14; 13.2 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.

IV. SERVICES RENDERED BY RECEIVER AND OTTERBOURG DURING NINTH APPLICATION PERIOD

In accordance with Section D.3 of the SEC Billing Guidelines, Applicants segregated their time during the Ninth Application Period into seven (7) project categories.⁹ Narrative summaries of these activity categories follow:

⁹ 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.

**A. Asset Analysis and Recovery (P01) - Total Fees: \$ 73,819.00
Asset Disposition (P02)¹⁰ - Total Fees: \$137,140.00**

During the Ninth 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 Ninth 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.

¹⁰ 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.

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

1. **Abdala** – refers to PPCO’s formerly held interests (through a subsidiary, West Ventures LLC) in a gold tailings impoundment located near Cuiababa, Brazil. PPCO owned contract rights to extract gold for a period of ten years from the tailings impoundment, which was adjacent to the former Abdala gold mining operation. The sale of the Abdala Tailings Project was previously approved and closed in September 2018. The sale was for \$27.5 million in cash at closing (less payment of fees and taxes). The sale agreement also provided that if the gold content of the tailings impoundment was validated to exceed 9 grams per ton, the Receivership Estate will be entitled to receive \$3 million in cash royalty advances approximately six months after closing. Multiple rounds of testing have now been performed on the tailings impoundment to determine the gold content. The results of these tests as reported to the Receiver are that the gold content is well below the 9 grams per ton threshold and Platinum will not be receiving any additional consideration from this asset.

During the Ninth Application Period, Applicants attended to certain post-closing issues. Applicants reviewed the results of the gold content testing and participated in conference calls with counsel to discuss their concerns regarding the low gold content. Otterbourg attorneys who have billed time to this matter include attorneys with litigation experience and transactional experience.

2. **Accutane** - refers to a litigation financing investment by Platinum in a products liability litigation concerning the drug Accutane. In October 2018, the Supreme Court for the State of New Jersey entered a decision ending the lawsuits. This investment was insured by

insurance from two insurance companies that had insured 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. During the Ninth Application Period, Applicants and Platinum's General Counsel spent time reviewing documents produced by the insurers and had multiple calls with the insurance carrier's counsel, and negotiated and consummated a settlement with the insurance companies that recovered \$1.8 million in settlement proceeds. Otterbourg attorneys who have billed time to this matter include attorneys with litigation experience.

3. 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 "Agera Action"). The Case is No. 2019-0431. Thereafter, the case was removed to the United States District Court for the District of Delaware (Case No. 19-cv-01319), where a motion for remand is currently pending.

In addition, on October 4, 2019, Agera Energy LLC and certain of its affiliates, none of which are parties to the Agera Action, filed for chapter 11 bankruptcy relief in the United States Bankruptcy Court for the Southern District of New York, Case No. 19-23803.

During the Ninth Application Period, Applicants reviewed filings in both the Delaware matter and the bankruptcy case, as well as spent time communicating with counsel for PGS and PPVA regarding these matters. Otterbourg attorneys who have billed time to this matter include attorneys with litigation experience.

4. **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 Reporting Period, the Receivership Team and contingency counsel continued to litigate the counterclaims asserted by the back-end beneficiary, which claims the Receiver believes are without merit and are legally deficient, and continued to pursue the primary claims against the insurer. Discovery has concluded.

During the Ninth Application Period, Applicants worked with contingency counsel regarding discovery matters, including the taking and defense of depositions and the retention of an expert. 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.

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 Ninth Application Period, the only remaining issue to be resolved to enable Arabella to make distributions and close the bankruptcy case, was the claim by the AEI liquidator and his professionals for approximately \$530,000 (the “Substantial Contribution Claim”). These professionals were retained by Prior Management to assist with the workout of the Arabella loan and are also parties to a Guaranty Agreement with Prior Management. The Receiver objected to the Substantial Contribution Claim.

During the Ninth Application Period, the parties, while preparing for discovery, agreed to mediate the issue in a one-day session in Texas. Applicants agreed to the selection of a mediator, prepared a mediation statement and participated in an all-day mediation session in Texas on August 14, 2019. As a result of the all-day mediation, a resolution was reached by which the substantial contribution claim was allowed against the Arabella estate in the amount of \$100,000 and the AEI liquidator and his professionals will be entitled to an unsecured claim against the Platinum estate for the balance. This resolution avoided the additional cost and expense of litigation the Substantial Contribution Claim in the Arabella bankruptcy. Arabella’s professionals are currently in the process of settling the amounts owed to all parties. Arabella intends to make final distributions before the end of the year. Any proceeds received by Platinum are subject to a claim by the counterparty to a Participation Agreement entered into with the Prior Receiver. The Receiver is in the process of resolving the claim with the participant.

During the Ninth Application Period, in addition to preparing for and attending the mediation session, Applicants also documented the terms of the settlement with the claimants,

and had frequent telephonic and e-mail communications with Arabella's retained professionals, including its CRO, bankruptcy counsel and litigation counsel. 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. Otterbourg attorneys who have billed time to this matter include attorneys with experience in bankruptcy and litigation.

6. **Greehey** – refers to a \$3.23 million secured loan (the "**Loan**") made by a wholly owned subsidiary of PPCO, Bakken Development Opportunities, I, LLC ("**Bakken**"), to Greehey & Company, Ltd. ("**Greehey**") and Dynamic Resources LLC ("**Dynamic**," and together with Greehey, "**Defendants**"). The Loan was secured by certain real property located in Telluride, Colorado and certain oil and gas leases located in North Dakota. The Loan matured on August 31, 2017. Despite repeated requests by the Receiver, the Defendants failed to pay the amounts outstanding under the Loan and on August 1, 2019, the Receiver commenced a lawsuit against Greehey and Dynamic seeking entry of a judgment holding Defendants in default on an immediate payment obligation to Bakken of \$3.23 million, in addition to associated interest, costs and expenses, including reasonable attorneys' fees and costs. The Defendants have since answered the complaint and filed counterclaims against PPCO and Bakken, and discovery has commenced.

During the Ninth Application Period, Applicants prepared for and attended the case management conference and assisted with the preparation of an answer to the counterclaims. Otterbourg attorneys who have billed time to this matter include attorneys with experience in litigation.

7. **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.

Unlike the usual circumstance in which assets are sold from a bankruptcy estate free and clear of all liens, here, the bankruptcy court order did not provide for the sale of the assets to LC Energy free and clear of liens. As a result, there were multiple liens and a claim by the committee of unsecured creditors in the Lily Group bankruptcy case asserted against the LC Energy assets. The Receivership Court previously approved a Bid Procedures Motion on January 16, 2019 [Dkt. No. 444] and Houlihan Lokey immediately began to market the LC Energy assets.

The one offer received for the Mine 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. When it became apparent that no additional bids were forthcoming, the Receiver met and conferred with Houlihan Lokey, her financial advisors, her local Indiana bankruptcy and environmental counsel, and certain other experts and interested parties, to determine how best to dispose of the Mine without the prospects of a ready, willing and able buyer for it. The Receiver considered abandoning the Mine. However, while the Receiver believed that upon abandonment, ERC Mining Indiana Corp. (the “Purchaser”), in its capacity as manager of the Mine, would be responsible to remediate the Mine, the Purchaser disagreed. Rather, the Purchaser asserted that LC Energy would remain liable for any such costs and expenses, expenses that the Purchaser asserted could well exceed \$1.5 million. To avoid a lengthy and costly dispute over the ramifications of abandonment, the parties soon commenced

negotiations about the future of the Mine and which party would have responsibility for satisfying associated liabilities. The Receiver ultimately agreed with the Purchaser in an Asset Purchase Agreement dated August 16, 2019 (the “APA”), that LC Energy would sell the Mine to the Purchaser while the Purchaser would 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 the Purchaser of \$380,000 and an assignment to the Purchaser of the \$250,000 in cash collateral currently securing a bond in favor of the State of Indiana. The APA was approved by the Receivership Court and closing of the sale occurred during the Ninth Application Period.

During the Ninth Application Period, Applicants continued to review its options with respect to this asset and the potential environmental liability that could arise or be asserted. Applicants had several conference calls with local Indiana bankruptcy and environmental counsel and considered the abandonment of the asset, including the preparation of a motion to abandon. Simultaneously, Applicants spoke with the permittee of the Mine and entered into negotiations for the permittee to become the Purchaser. Otterbourg attorneys provided the Purchaser with necessary due diligence, drafted the sale documents, including a bill of sale and quitclaim deed and effectuated the closing of the sale on September 20, 2019. 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.

B. Case Administration (P04) - Total Fees: \$ 93,125.00

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 Ninth 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 responded to investor inquiries and continue to regularly respond and react to inquiries and requests for information. The Receiver held a Town Hall on August 14, 2019. Applicants spent time preparing for the Town Hall and addressing questions that were provided in advance of the webinar. Applicants also prepared the Eighth Status Report of the Receiver during the Ninth Application Period.

2. **Defendants.** During the Ninth 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 Ninth 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 for post-Receivership work and reserving judgment on the Receiver's cross-motion seeking disgorgement of fees paid to S&W for pre-Receivership work after the commencement of the Receivership. [Dkt. No. 383] S&W then appealed that decision to the U.S. Court of Appeals for the Second Circuit. During the Ninth Application Period, Applicants participated 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 S&W filed its appeal brief. Since then the Receiver has reached an agreement in principle with S&W that Applicants are in the process of documenting. The settlement requires Court approval and its terms will be publicly filed.

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

6. **PPVA**. Applicants had regular 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 action discussed above. Applicants 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. **Receiver Oversight.** Time during the Ninth 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 regularly 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. Forensic/Investigatory Work (P10) - Total Fees: \$16,758.00

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 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 entered into tolling agreements with potential targets and has amended such agreements to extend the time period when necessary and appropriate. Applicants also negotiated a protective order with one of Platinum's former professionals regarding the delivery of documents to the Receiver. Applicants also reviewed and responded to subpoenas.

D. Beechwood Action (P14) – Total Fees: \$ 543,197.00

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 Conesco 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). 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 now 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 Ninth 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 dismiss 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 in preparation for oral argument which was heard during the Application Period. The Applicants participated in discovery, including depositions, which commenced during the Application Period. Finally, the Applicants participated in numerous discussions and meetings with various defendants regarding potential settlements of the claims.

E. Arbitration (P15) – Total Fees \$529,539.00

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 took 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 Ninth Application Period, Applicants reviewed the Accounting Firms' motion for summary judgment and researched and prepared a memorandum of law in response to the motion. In connection with the response to the motion for summary judgment, Applicants researched relevant issues, reviewed documents and spoke with the Receiver's retained experts. Applicants also prepared the Receiver's witness for deposition, prepared for the deposition of the Accounting Firms' witness and attended the depositions. Applicants also spent time during the Ninth Application Period engaged in extensive correspondence with opposing counsel and the representatives of the arbitration panel regarding the selection of a replacement neutral arbitrator and researched numerous potential replacements.

V. EXPLANATION OF EXPENSES AND RELATED POLICIES

Applicants seek reimbursement of its out-of-pocket costs in the amount of \$19,277.71. **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 Ninth 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 39,026 internal laser copies and photocopies during the Ninth Application Period at the rate of 0.15 cents per page, totaling \$5,853.90 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 Ninth 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 Ninth 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 Ninth Interim Fee Application if the requested fees are approved is \$98,683.52 (\$8,867.44 for the Receiver and \$89,816.08 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 \$44,337.20 (the "Allowed Receiver Fees");

(b) Grant interim approval of Otterbourg's compensation in the amount of \$1,038,220.95 (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 \$938.27;

(d) grant interim approval of Otterbourg's request for reimbursement of its out-of-pocket expenses in the amount of \$18,339.44;

(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: December 24, 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 7/1/2019 to 9/30/2019

FUND ACCOUNTING (See Instructions)		Period from 7/1/2019 to 9/30/2019		
		PPCO	PPLO	Total
Line 1	Beginning Balance (As of 7/1/2019)	\$ 33,684,375	\$ 3,203,908	\$ 36,888,283
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income	-	-	-
Line 3	Cash and Securities	-	-	-
Line 4	Interest/Dividend Income	61,093	-	61,093
Line 5	Business Asset Liquidation ¹	1,800,000	-	1,800,000
Line 6	Personal Asset Liquidation	-	-	-
Line 7	Third-Party Litigation Income	-	-	-
Line 8	Miscellaneous - Other	2,791	-	2,791
	Total Funds Available (Lines 1-8)	\$ 35,548,260	\$ 3,203,908	\$ 38,752,167
	<i>Decreases in Fund Balance:</i>			
Line 9	Disbursements to Investors/Claimants	-	-	-
Line 10	Disbursements for Receivership Operations	-	-	-
Line 10a	Disbursements to Receiver or Other Professionals	(4,037,597)	-	(4,037,597)
Line 10b	Business Asset Expenses	(517,613)	-	(517,613)
Line 10c	Personal Asset Expenses	-	-	-
Line 10d	Investment Expenses ²	(427,053)	-	(427,053)
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	-	-	-
	Total Disbursements for Receivership Operations	\$ (4,982,262)	\$ -	\$ (4,982,262)
Line 11	Disbursements for Distribution Expenses Paid by the Fund	-	-	-
Line 12	Disbursements to Court/Other	-	-	-
	Total Funds Disbursed	\$ (4,982,262)	\$ -	\$ (4,982,262)
Line 13	Ending Balance (As of 9/30/2019)	\$ 30,565,997	\$ 3,203,908	\$ 33,769,905

(1) This amount consists of the proceeds received from the settlement of a dispute with two insurance companies insuring up to a \$4.5 million return on a litigation finance investment commonly referred to as "Accutane".

(2) Of this amount, \$380,000 represents funds paid to the purchaser of LC Energy to avoid environmental liabilities, the balance represents funds used to preserve the pre-sale value of LC Energy.

EXHIBIT B

Fee Schedule by Professional

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

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation¹
Melanie L. Cyganowski ("MLC") Partner	1982	\$1250.00 ²	55.7	\$69,625.00
Adam C. Silverstein ("ACS") Partner	1992	\$865.00	258.5	\$223,602.50
Philip C. Berg ("PCB") Partner	1992	\$840.00	60.9	\$51,156.00
William M. Moran ("WMM") Partner	1990	\$795.00	253.7	\$201,691.50
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$805.00	108.1	\$87,020.50
Erik B. Weinick ("EBW") Of Counsel	2002	\$765.00	377.2	\$288,558.00
Andrew S. Halpern ("ASH") Associate	1986	\$760.00	416.0	\$316,160.00
Breahna S. Wright ("BSW") Associate	2017	\$370.00	18.9	\$6,993.00
Gabriela S. Leon ("GSL") Associate	2019	\$295.00	360.4	\$106,318.00
Christine M. O'Brien ("CMO") Paralegal	N/A	\$295.00	16.7	\$4,926.50
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$295.00	141.4	\$41,713.00
	TOTAL		2067.5	\$1,397,764.00

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

² 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)

Project Code	Project Category	Total Hours	Total Fees Recorded	Billable Rate Accommodation¹	Public Service Accommodation²	Total Accommodation	Total Fees Requested
P01	Asset Analysis and Recovery	8.2	\$10,250.00	\$2,091.00	\$1,631.80	\$3,722.80	\$6,527.20
P02	Asset Disposition	8.0	\$10,000.00	\$2,040.00	\$1,592.00	\$3,632.00	\$6,368.00
P04	Case Administration	19.2	\$24,000.00	\$4,896.00	\$3,820.80	\$8,716.80	\$15,283.20
P14	Beechwood Litigation	18.0	\$22,500.00	\$4,590.00	\$3,582.00	\$8,172.00	\$14,328.00
P15	Arbitration	2.3	\$2,875.00	\$586.50	\$457.70	\$1,044.20	\$1,830.80
	TOTALS:	55.7	\$69,625.00	\$14,203.50	\$11,084.30	\$25,287.80	\$44,337.20

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

Project Code	Project Category	Total Hours	Total Fees Recorded	Public Service Accommodation³	Total Fees Requested
P01	Asset Analysis and Recovery	90.0	\$63,569.00	\$6,356.90	\$57,212.10
P02	Asset Disposition	158.4	\$127,140.00	\$12,714.00	\$114,426.00
P04	Case Administration	101.4	\$69,125.00	\$6,912.50	\$62,212.50
P10	Forensics	24.5	\$16,758.00	\$1,675.80	\$15,082.20
P13	Travel	5.2	\$4,186.00	\$418.60	\$3,767.40
P14	Beechwood Litigation	853.3	\$520,697.00	\$130,174.25	\$390,522.75
P15	Arbitration	779.0	\$526,664.00	\$131,666.00	\$394,998.00
	TOTALS:	2011.8	\$1,328,139.00	\$289,918.05	\$1,038,220.95

¹ 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.

² The public service accommodation is 20% for all project codes.

³ 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**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation¹
Melanie L. Cyganowski ("MLC") Partner	1982	\$1,250.00	8.2	\$10,250.00
Adam C. Silverstein ("ACS") Partner	1992	\$865.00	.9	\$778.50
Philip C. Berg ("PCB") Partner	1992	\$840.00	6.4	\$5,376.00
William M. Moran ("WMM") Partner	1990	\$795.00	.7	\$556.50
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$805.00	26.9	\$21,654.50
Erik B. Weinick ("EBW") Of Counsel	2002	\$765.00	39.2	\$29,988.00
Breahna S. Wright ("BSW") Associate	2017	\$370.00	7.0	\$2,590.00
Gabriela S. Leon ("GSL") Associate	2019	\$295.00	4.1	\$1,209.50
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$295.00	4.8	\$1,416.00
	TOTAL		98.2	\$73,819.00

¹ 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

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation¹
Melanie L. Cyganowski ("MLC") Partner	1982	\$1,250.00	8.0	\$10,000.00
Philip C. Berg ("PCB") Partner	1992	\$840.00	50.8	\$42,672.00
William M. Moran ("WMM") Partner	1990	\$795.00	29.8	\$23,691.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$805.00	31.5	\$25,357.50
Erik B. Weinick ("EBW") Of Counsel	2002	\$765.00	46.3	\$35,419.50
	TOTAL		166.4	\$137,140.00

¹ 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**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation¹
Melanie L. Cyganowski ("MLC") Partner	1982	\$1,250.00	19.2	\$24,000.00
Adam C. Silverstein ("ACS") Partner	1992	\$865.00	7.5	\$6,487.50
Philip C. Berg ("PCB") Partner	1992	\$865.00	3.7	\$3,108.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$805.00	44.0	\$35,420.00
Erik B. Weinick ("EBW") Of Counsel	2002	\$765.00	20.4	\$15,606.00
Breahna S. Wright ("BSW") Associate	2017	\$370.00	11.9	\$4,403.00
Gabriela S. Leon ("GSL") Associate	2019	\$295.00	.6	\$177.00
Christine M. O'Brien ("CMO") Paralegal	N/A	\$295.00	1.9	\$560.50
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$295.00	11.4	\$3,363.00
	TOTAL		120.6	\$93,125.00

¹ 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

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation¹
Adam C. Silverstein ("ACS") Partner	1992	\$865.00	.3	\$259.50
Erik B. Weinick ("EBW") Of Counsel	2002	\$765.00	2.6	\$1,989.00
Andrew S. Halpern ("ASH") Associate	1986	\$760.00	17.5	\$13,300.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$295.00	4.1	\$1,209.50
	TOTAL		24.5	\$16,758.00

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

P13 – TRAVEL
SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS
FOR PROJECT CODE P13

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation ²
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$805.00	5.2	\$4,186.00
	TOTAL		5.2	\$4,186.00

² 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**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation³
Melanie L. Cyganowski ("MLC") Partner	1982	\$1,250.00	18.0	\$22,500.00
Adam C. Silverstein ("ACS") Partner	1992	\$865.00	2.8	\$2,422.00
William M. Moran ("WMM") Partner	1990	\$795.00	215.1	\$171,004.50
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$805.00	.5	\$402.50
Erik B. Weinick ("EBW") Of Counsel	2002	\$765.00	257.3	\$196,834.50
Andrew S. Halpern ("ASH") Associate	1986	\$760.00	83.1	\$63,156.00
Gabriela S. Leon ("GSL") Associate	2019	\$295.00	186.1	\$54,899.50
Christine M. O'Brien ("CMO") Paralegal	N/A	\$295.00	.5	\$147.50
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$295.00	107.9	\$31,830.50
	TOTAL		871.3	\$543,197.00

³ 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**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation¹
Melanie L. Cyganowski ("MLC") Partner	1982	\$1,250.00	2.3	\$2,875.00
Adam C. Silverstein ("ACS") Partner	1992	\$865.00	247.00	\$213,655.00
William M. Moran ("WMM") Partner	1990	\$795.00	8.1	\$6,439.50
Erik B. Weinick ("EBW") Of Counsel	2002	\$765.00	11.4	\$8,721.00
Andrew S. Halpern ("ASH") Associate	1986	\$760.00	315.4	\$239,704.00
Gabriela S. Leon ("GSL") Associate	2019	\$295.00	169.6	\$50,032.00
Christine M. O'Brien ("CMO") Paralegal	N/A	\$295.00	14.3	\$4,218.50
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$295.00	13.2	\$3,894.00
	TOTAL		781.3	\$529,539.00

¹ 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 7, 2019
BILL NO. 205862

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

For Services Rendered Through September 30, 2019:

Phase: P01		Asset Analysis & Recovery	
<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/19 MLC	Conference(s) in Office Arabella - discussions with EBW re: substantial contribution motion	.10	125.00
07/02/19 MLC	Analysis of Legal Papers Review of final draft of Accutane settlement	.90	1,125.00
07/08/19 MLC	Correspondence Correspondence re potential development involving Cleveland Mining liquidation in Australia	.90	1,125.00
07/12/19 MLC	Conference call(s) Team meeting conference call and post-meeting with W. Edwards	1.50	1,875.00
07/18/19 MLC	Telephone Call(s) LC Energy - telephone call with PCB	.30	375.00

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

Client/Matter: 22126/0901
Page 2

November 7, 2019
BILL NO. 205862

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/19/19 MLC	Telephone Call(s) Telcon with Neal Jacobson concerning updates re Abdalla and LC Energy	.20	250.00
08/12/19 MLC	Conference(s) In Office Con with JSF to prepare for Arabella mediation	.40	500.00
08/13/19 MLC	Conference(s) In Office Team meeting with Otterbourg and Goldin concerning status of various dispositions and litigation strategies	1.50	1,875.00
08/26/19 MLC	Conference(s) in Office Meeting with Otterbourg and Goldin teams re: abdala and related issues	1.30	1,625.00
09/06/19 MLC	Conference call(s) Team meeting with Goldin and Otterbourg	1.10	1,375.00
TOTAL PHASE P01		8.20	\$10,250.00

Phase: P02

Asset Disposition

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/19 MLC	Conference(s) in Office Meeting with JSF re: LC Energy and Arabella	.50	625.00

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

Client/Matter: 22126/0901
Page 3

November 7, 2019
BILL NO. 205862

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/08/19	MLC	Analysis of Legal Papers Reviewed proposed settlement of certain stock transactions	.70	875.00
07/09/19	MLC	Correspondence Correspondence with Trey Rogers concerning sale of BLINK stock	.30	375.00
07/17/19	MLC	Review/analyze LC Energy - review status update	.20	250.00
07/18/19	MLC	Conference(s) In Office Meeting with EBW and Brent W concerning LC Energy and next steps	.70	875.00
07/19/19	MLC	Telephone Call(s) Telcon with Brian Pfeiffer concerning Abdalla	.30	375.00
08/05/19	MLC	Conference(s) In Office Meeting with EBW, WM and Brent Weisenberg re Steinberg, and LC Energy issues	.50	625.00
08/20/19	MLC	Conference(s) in Office Conference re: status of Abdala; Beechwood and Arabella	.30	375.00
08/21/19	MLC	Telephone Call(s) Telcon with Paul Sanabria (HL) re Abdala	.50	625.00

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

Client/Matter: 22126/0901
Page 4

November 7, 2019
BILL NO. 205862

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/21/19 MLC	Telephone Call(s) Telcon with Neal Jacobson and EBW re Abdala	.50	625.00
08/23/19 MLC	Correspondence Correspondence with Goldin and Otterbourg teams re meeting on Abdalla issues	.40	500.00
08/26/19 MLC	Conference(s) in Office LC Energy - discussions with EBW	.40	500.00
08/26/19 MLC	Review/analyze LC Engergy - review motion papers	.60	750.00
08/27/19 MLC	Correspondence Correspondence with B. Pfeiffer re: meeting with centerbridge	.20	250.00
09/05/19 MLC	Conference(s) In Office Conference with Centerbridge and its counsel re Abdala	1.50	1,875.00
09/23/19 MLC	Telephone Call(s) Telcon with Centerbridge concerning Abdala	.40	500.00
TOTAL PHASE P02		8.00	\$10,000.00

Phase: P04

Case Administration

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
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OTTERBOURG P.C.
230 PARK AVENUE
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901
Page 5

November 7, 2019
BILL NO. 205862

07/01/19 MLC	Review Financial Documents Review of proposed financial payment wires	.80	1,000.00
07/01/19 MLC	Analysis of Legal Papers Reviewed draft opposition to Salfati motion	1.70	2,125.00
07/01/19 MLC	Review Financial Documents Attention to Capital One matter concerning closing of ALS account without authorization	.60	750.00
07/02/19 MLC	Analysis of Legal Papers Follow up review of revisions to Salfati opposition draft	.70	875.00
07/02/19 MLC	Analysis of Legal Papers Review of Rhodes deposition in S&W matter	2.20	2,750.00
07/02/19 MLC	Analysis of Legal Papers Review of Baum deposition transcript	1.30	1,625.00
07/03/19 MLC	Conference(s) In Office Meeting with Brent Weisenberg to review and sign Poteat contract extension	.70	875.00
07/08/19 MLC	Review Financial Documents Reviewed financial analysis report prepared by Goldin	1.30	1,625.00

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

Client/Matter: 22126/0901
Page 6

November 7, 2019
BILL NO. 205862

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/09/19	MLC	Telephone Call(s) Telcon with Neal Jacobson in preparation for CAMP mediation session with S&W	.20	250.00
07/09/19	MLC	Conference call(s) CAMP mediation session involving S&W and SEC	1.80	2,250.00
08/05/19	MLC	Correspondence Review of Trott correspondence re Israel tax exemption	.40	500.00
08/05/19	MLC	Draft/revise Review of draft letter to Steinberg counsel	.40	500.00
08/12/19	MLC	Draft/revise Reviewed and revised Town Hall script	1.80	2,250.00
08/12/19	MLC	Telephone Call(s) Telcon with ACS re S&W mediation	.10	125.00
08/12/19	MLC	Correspondence Correspondence re Second Circuit mediation re S&W	.30	375.00
08/19/19	MLC	Conference call(s) Conference call with Second Circuit Mediator Dean Leslie with SEC and S&W	2.60	3,250.00

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

Client/Matter: 22126/0901
Page 7

November 7, 2019
BILL NO. 205862

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/20/19 MLC	Correspondence Correspondence with Neal Jacobson re status update	.20	250.00
08/22/19 MLC	Correspondence Correspondence re: expert retention	.20	250.00
08/27/19 MLC	Conference(s) in Office S&W - meeting with ACS re: settlement	.40	500.00
08/29/19 MLC	Conference(s) in Office S&W - conference with EBW and ACS re: S&W and the participant	.20	250.00
08/30/19 MLC	Review Financial Documents Review bi-monthly financial summary and itemization provided by Goldin	.60	750.00
09/13/19 MLC	Review Financial Documents Review and payment of certain receivership expenses	.70	875.00
TOTAL PHASE P04		19.20	\$24,000.00

Phase: P14

BEECHWOOD LITIGATION

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
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OTTERBOURG P.C.
230 PARK AVENUE
NEW YORK, NY 10169-0075

Client/Matter: 22126/0901
Page 8

November 7, 2019
BILL NO. 205862

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/03/19	MLC	Analysis of Legal Papers Review of Rule 30(b)(6) subpoena directed to MLC	.80	1,000.00
07/03/19	MLC	Correspondence Correspondence with litigation team concerning Rule 30(b)(6) potential alternates	.80	1,000.00
07/11/19	MLC	Conference(s) in Office Beechwood - conference with EBW re: status and strategy	.30	375.00
07/17/19	MLC	Conference(s) in Office Beechwood - conference with EBW re: strategy	.30	375.00
08/05/19	MLC	Correspondence Correspondence re Beechwood litigation	.60	750.00
08/05/19	MLC	Conference(s) in Office Beechwood - conference with EBW and WMM re: strategy	.20	250.00
08/09/19	MLC	Conference(s) in Office Beechwood - conference with EBW re: status and strategy	.20	250.00
08/15/19	MLC	Attendance at Hearing Beechwood - attend court for oral argument on motions to dismiss	8.00	10,000.00

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

Client/Matter: 22126/0901
Page 9

November 7, 2019
BILL NO. 205862

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/20/19	MLC	Analysis of Legal Papers Reviewed and analyzed Court summary and decision	1.40	1,750.00
08/29/19	MLC	Prepare for Meeting Prepare for mediation session with certain Beechwood parties	.80	1,000.00
08/29/19	MLC	Conference Out of Office Meeting at Proskauer with EBW and certain Beechwood parties to discuss possible resolution of litigation	2.00	2,500.00
09/03/19	MLC	Correspondence Correspondence concerning mediation	.90	1,125.00
09/12/19	MLC	Telephone Call(s) Conference call with EBW and Brent Weisenberg re mediation session	.70	875.00
09/16/19	MLC	Conference(s) In Office Conference with Brent Weisenberg, ACS, WM, EBW and Trey Rogers concerning Beechwood litigation, potential settlement and next steps	1.00	1,250.00
TOTAL PHASE P14			18.00	\$22,500.00

Phase: P15

ARBITRATION

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Client/Matter: 22126/0901
Page 10

November 7, 2019
BILL NO. 205862

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/10/19	MLC	Correspondence Correspondence with Otterbourg team re: comments on reply to dispositive motion to dismiss arbitration	.60	750.00
09/13/19	MLC	Conference(s) In Office Meeting with ACS re deposition of Trey Rogers in Arbitration	.40	500.00
09/23/19	MLC	Correspondence Correspondence re neutral arbitrator selection	1.30	1,625.00
TOTAL PHASE P15			2.30	\$2,875.00
			TOTAL FOR SERVICES	\$69,625.00

EXHIBIT E

Otterbourg Time Records

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

December 23, 2019
BILL NO. 206900

For Services Rendered Through September 30, 2019:

<u>DATE</u>		<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
Phase: P01		Asset Analysis & Recovery		
<u>ATTORNEY</u>	<u>DATE</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
EBW	07/01/19	Legal Research Agera - attention to legal research regarding causes of action.	2.80	2,142.00
EBW	07/01/19	Correspondence Arabella - correspondence with local counsel and adversary and attention to substantial contribution motion issues.	.70	535.50
EBW	07/01/19	Telephone Call(s) Arabella - teleconference with debtor's counsel regarding substantial contribution motion discovery.	.20	153.00
JKH	07/01/19	Review Documents Arabella - reviewing corrected notices and doc requests	.20	59.00
EBW	07/02/19	Correspondence Arabella - correspondence with adversary and co-counsel regarding discovery.	.30	229.50

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Client/Matter: 22126/0902
Page 2

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/19	EBW	Telephone Call(s) Arabella - teleconferences with debtor's professionals.	.40	306.00
07/02/19	EBW	Conference(s) In Office Arabella - conference with Receiver regarding substantial contribution motion and related discovery. (EBW portion).	.10	76.50
07/02/19	EBW	Analysis of Legal Papers Accutane - review of revised settlement agreement and teleconference with B. Weisenberg regarding same.	.30	229.50
07/02/19	EBW	Telephone Call(s) Accutane - teleconference with B. Weisenberg and counsel for insurer regarding settlement.	.20	153.00
07/03/19	EBW	Telephone Call(s) Arabella - teleconference with counsel for substantial contribution movant.	.20	153.00
07/09/19	EBW	Analysis of Legal Papers Pro Player - analysis of borrower bankruptcy issues.	.10	76.50
07/09/19	EBW	Analysis of Legal Papers Pro Player - attention to Harris loan issues; including teleconference and correspondence with Borrower's counsel.	1.10	841.50

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Client/Matter: 22126/0902
Page 3

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/11/19	EBW	Review Documents Arabella - analysis of possible mediators and correspondence with debtor regarding same.	.90	688.50
07/11/19	PCB	Prep. for conference call Preparation for bi-weekly team meeting conference call; review of deal files.	.60	504.00
07/12/19	JSF	Conference(s) in Office Team Meeting Conference Call and Post-Meeting with Receiver and W. Edwards	1.40	1,127.00
07/12/19	JSF	Examine Documents Prepare for Team Meeting/Call with Receiver	.60	483.00
07/12/19	EBW	Telephone Call(s) Dispositions - bi-weekly team strategy and status conference. (EBW Portion)	.90	688.50
07/12/19	PCB	Conference call(s) Bi-weekly Receiver; Otterbourg; Goldin and Platinum team meeting.	1.50	1,260.00
07/15/19	EBW	Correspondence Arabella - correspondence with debtor; adversary and receivership team; regarding mediation and hearing schedule.	.60	459.00

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Client/Matter: 22126/0902
Page 4

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/15/19	JKH	Diary & Docket Arabella - review of email with mediation date and calendaring same	.10	29.50
07/16/19	EBW	Correspondence Arabella - correspondence with JOL.	.20	153.00
07/16/19	WMM	Legal services/Legal Papers Receive and review removal papers from CNO in Agera case.	.70	556.50
07/17/19	EBW	Analysis of Legal Papers Agera - analysis of notice of removal.	.40	306.00
07/17/19	EBW	Conference Out of Office Arabella - conference with M. Trott regarding outstanding issues.	.50	382.50
07/17/19	GSL	Analysis/Strategy Research - re Agera removal	.30	88.50
07/19/19	EBW	Correspondence Arabella - correspondence with adversaries and debtor regarding motion resolution.	.80	612.00
07/19/19	EBW	Analysis of Legal Papers Accutane - review of executed settlement agreement and correspondence with receivership team regarding same.	.20	153.00

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Client/Matter: 22126/0902
Page 5

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/22/19	EBW	Telephone Call(s) Arabella - teleconference with co-counsel regarding protective order.	.10	76.50
07/22/19	EBW	Analysis of Legal Papers Arabella - review of motion for protective order and preparation of responsive correspondence.	.90	688.50
07/22/19	EBW	Telephone Call(s) Arabella - teleconferences with counsel for substantial contribution claimant.	.40	306.00
07/22/19	EBW	Correspondence Arabella - correspondence with parties regarding substantial contribution discovery.	.40	306.00
07/23/19	JSF	Examine Documents Arabella - Waterfall Analysis and Potential Distributions	.30	241.50
07/23/19	EBW	Correspondence Arabella - correspondence with other parties regarding scheduling.	.40	306.00
07/23/19	EBW	Telephone Call(s) Arabella - teleconference with counsel for participant.	.20	153.00

OTTERBOURG P.C.
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Client/Matter: 22126/0902
Page 6

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/23/19	EBW	Preparation of Legal Papers Arabella - preparation of objections to movant's document requests.	.40	306.00
07/23/19	EBW	Preparation of Legal Papers Greehey - revisions to draft complaint.	.30	229.50
07/24/19	JSF	Examine Documents Greehey - Draft Complaint	.30	241.50
07/25/19	EBW	Preparation of Legal Papers Arabella - revisions to mediation statement.	.40	306.00
07/30/19	EBW	Analysis of Legal Papers Accutane - attention to settlement issues.	.20	153.00
07/30/19	EBW	Correspondence Accutane - correspondence with receivership team regarding settlement proceeds.	.10	76.50
07/31/19	JSF	Examine Documents Accutane Settlement Details	.30	241.50
07/31/19	EBW	Preparation of Legal Papers Arabella - preparation of mediation statement.	1.20	918.00

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Client/Matter: 22126/0902
Page 7

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/01/19	EBW	Preparation of Legal Papers Greehey - finalize and file complaint.	1.80	1,377.00
08/01/19	EBW	Preparation of Legal Papers Arabella - revisions to mediation statement.	.40	306.00
08/01/19	GSL	Review/correct Complaint Review of Greehey Complaint (re Greehey/Dynamic)	1.40	413.00
08/01/19	GSL	Filing Papers at Court Prepared Summons and Cover Sheet for Greehey Complaint (re Greehey/Dynamic)	.90	265.50
08/01/19	GSL	Analysis/Strategy Research - 7.1 Disclosure Statement (re Greehey/Dynamic Complaint)	.70	206.50
08/02/19	EBW	Preparation of Legal Papers Arabella - revisions to mediation statement.	.80	612.00
08/02/19	EBW	Correspondence Lincoln - correspondence with contingency counsel regarding status.	.10	76.50
08/02/19	EBW	Analysis of Legal Papers Greehey - analysis of case initiating filings.	.40	306.00

OTTERBOURG P.C.
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Client/Matter: 22126/0902
Page 8

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/02/19	GSL	Service of Summons and Complaint Arranging for service of process in TX (Greehey/Dynamic Complaint)	.60	177.00
08/03/19	EBW	Preparation of Legal Papers Arabella - preparation of mediation statement.	.60	459.00
08/05/19	EBW	Preparation of Legal Papers Arabella - revisions to mediation statement and correspondence with local counsel.	.90	688.50
08/05/19	JKH	Prepare Legal Papers Arabella - Preparing and reviewing Receiver's Mediation Statement re substantial contribution	1.10	324.50
08/06/19	EBW	Preparation of Legal Papers Arabella - revisions to mediation statement and correspondence with mediator.	.60	459.00
08/06/19	JKH	Preparation for Mediation Arabella - preparing mediation letter/statement	1.30	383.50
08/07/19	EBW	Analysis of Legal Papers Greehey - analysis of filings from court.	.40	306.00

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Client/Matter: 22126/0902
Page 9

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/07/19	EBW	Correspondence Lincoln - correspondence with contingency counsel.	.20	153.00
08/08/19	EBW	Telephone Call(s) Lincoln - teleconference with B. Weisenberg regarding status and strategy.	.20	153.00
08/08/19	EBW	Analysis of Legal Papers Greehey - attention to status and strategy issues.	.20	153.00
08/08/19	JKH	Prepare Legal Papers Arabella - preparing mediation statement	.80	236.00
08/09/19	EBW	Analysis of Legal Papers Accutane - attention to settlement issues.	.10	76.50
08/09/19	JKH	Prepare Legal Papers Arabella - preparing mediation statement to be sent to H. Rubin	.40	118.00
08/12/19	JSF	Prepare Legal Papers Agenda for Team Meeting	.40	322.00
08/12/19	JSF	Examine Documents Arabella - Prepare for Mediation Session	2.80	2,254.00
08/12/19	JSF	Examine Documents Arabella - Guaranty and Amended Guaranty	.40	322.00

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Client/Matter: 22126/0902
Page 10

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/13/19	JSF	Examine Documents Prepare for Team Meeting	.30	241.50
08/13/19	JSF	Conference(s) in Office Attendance at Team Meeting (JSF Partial Time)	.40	322.00
08/13/19	JSF	Examine Documents Arabella - Prepare for Mediation on Substantial Contribution (Read Cases; Mediation Statement; Motion and Objection)	3.60	2,898.00
08/13/19	JSF	Prepare Legal Papers Arabella - Prepare Outline of Opening Remarks and Arguments for Mediation Session	1.50	1,207.50
08/13/19	EBW	Conference(s) In Office Administrative - attendance at bi-weekly team meeting.	1.50	1,147.50
08/13/19	PCB	Conference(s) In Office Weekly team meeting with Receiver; Otterbourg; Goldin and Platinum.	1.40	1,176.00
08/13/19	ACS	Conference(s) w/ CoCounsel - Other Goldin-Otterbourg-Receiver meeting (ACS time) (.6) and meet with T. Rogers re arbitration (.3)	.90	778.50

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Client/Matter: 22126/0902
Page 11

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/14/19	JSF	Conference out of Office Arabella - Meet with Local Counsel Howard Rubin Prior to Mediation	.50	402.50
08/14/19	JSF	Examine Documents Arabella - Prepare for Mediation - Review Statement and Opening Notes	.40	322.00
08/14/19	JSF	Conference out of Office Arabella - Attend Mediation Session Before Judge Felsenthal re: Substantial Contribution Motion	7.00	5,635.00
08/14/19	EBW	Correspondence Arabella - correspondence and teleconferences with J. Feeney regarding mediation.	.30	229.50
08/15/19	JSF	Correspondence Arabella - Curt Solsvig re: Terms of Settlement on Substantial Contribution Motion	.10	80.50
08/15/19	JSF	Examine Documents Arabella - Review of Terms of Settlement with JOL Liquidators of Parent	.70	563.50
08/15/19	JSF	Examine Documents Arabella - Waterfall/Recovery to PPCO	.50	402.50

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Client/Matter: 22126/0902
Page 12

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/19/19	JSF	Examine Documents Review of Meeting Notes of Last Several Goldin/Otterbourg Team Meetings re: Assets and Status	1.60	1,288.00
08/20/19	EBW	Analysis of Legal Papers Greehey - analysis of issues regarding stipulation on lift stay.	.60	459.00
08/21/19	JSF	Examine Documents Arabella - Waterfall Analysis and Options for Settlement with Participant	.30	241.50
08/21/19	EBW	Analysis of Legal Papers Greehey - analysis of lift stay motion and correspondence with adversary regarding same.	.70	535.50
08/21/19	GSL	Prepare Notice of Appearance Prepared Notice of Appearance for ACS - re Greehey	.20	59.00
08/22/19	EBW	Correspondence Lincoln - correspondence with receiver and contingency counsel regarding expert retention.	.30	229.50
08/27/19	EBW	Analysis of Legal Papers Lincoln - review of expert retention agreement.	.20	153.00

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Client/Matter: 22126/0902
Page 13

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/28/19	EBW	Analysis of Legal Papers Lincoln - review of expert retention agreement.	.10	76.50
08/28/19	EBW	Correspondence Agera - correspondence with counsel for PPVA regarding items of mutual interest.	.40	306.00
08/29/19	JSF	Telephone Call(s) Arabella- Call with Forshey re: Settlement of Claim	.20	161.00
08/29/19	JSF	Telephone Call(s) Arabella - EBW re: Status of Participation; S&W and Forshey	.20	161.00
08/29/19	JSF	Examine Documents Arabella - Terms of Settlement and Process to Effectuate	.30	241.50
08/29/19	JSF	Examine Documents Arabella - Distribution Waterfall	.30	241.50
08/30/19	EBW	Analysis of Legal Papers Arabella - attention to settlement issues.	.10	76.50
09/03/19	EBW	Telephone Call(s) Recoveries - teleconference with B. Weisenberg regarding Arabella; Beechwood; Greehey; Agera; LC Energy and Lincoln.	.40	306.00

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NEW YORK, NY 10169-0075

Client/Matter: 22126/0902
Page 14

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/04/19	EBW	Correspondence Lincoln - correspondence and teleconference with contingency counsel.	.40	306.00
09/06/19	JSF	Examine Documents Prepare for Team Meeting	.30	241.50
09/06/19	JSF	Conference(s) in Office Team Meeting to Discuss Open Assets and Litigation (JSF Portion)	.80	644.00
09/06/19	JSF	Examine Documents Arabella - RHSW Claims and Letter to Forshey	.30	241.50
09/06/19	EBW	Conference(s) In Office Dispositions - attend bi-weekly team meeting. (EBW Portion)	1.00	765.00
09/06/19	PCB	Prep. for conference call Preparation for weekly team meeting including review of asset dispositions.	.60	504.00
09/06/19	PCB	Conference(s) In Office Weekly team meeting with Receiver; Otterbourg; Goldin and Platinum. (PCB Portion)	1.10	924.00
09/09/19	JSF	Examine Documents Arabella - Draft Letter to Forshey re: Claim	.20	161.00

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Client/Matter: 22126/0902
Page 15

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/10/19	JSF	Examine Documents Arabella - Letter re: RHSW Claim	.30	241.50
09/10/19	JSF	Examine Documents Arabella - Draft Stipulation re: Substantial Contribution Motion	.20	161.00
09/11/19	EBW	Preparation for Court Pro Player - attention to pre-conference issues.	.20	153.00
09/11/19	BSW	Review file re Legal Papers Pro Player reviewed legal papers in preparation for court appearance	2.00	740.00
09/12/19	BSW	Attendance at Court Pro Player: Attended court for conference	2.50	925.00
09/16/19	EBW	Analysis of Legal Papers Pro Player - analysis of entered scheduling orders.	.20	153.00
09/18/19	EBW	Correspondence Lincoln - correspondence with contingency counsel regarding depositions and strategy.	.30	229.50
09/18/19	JKH	Review/analyze Acceleration Bay - review joint status report and provide email summary to EBW	.60	177.00

OTTERBOURG P.C.
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NEW YORK, NY 10169-0075

Client/Matter: 22126/0902
Page 16

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/19/19	EBW	Analysis of Legal Papers Greehey - attention to case management conference issues.	.40	306.00
09/19/19	EBW	Analysis of Legal Papers Lincoln - attention to deposition issues.	.40	306.00
09/19/19	PCB	Preparation of Documents LC Energy - Preparation of Instrument of Assumption of Liabilities.	1.20	1,008.00
09/20/19	EBW	Correspondence Lincoln - correspondence with contingency counsel and B. Weisenberg regarding depositions.	.30	229.50
09/23/19	EBW	Conference(s) In Office Recoveries - conference with B. Weisenberg and T. Rogers regarding Beechwood; Lincoln; Greehey and Defendants.	.90	688.50
09/24/19	EBW	Preparation for Deposition Lincoln - preparation for Rule 30(b)(6) deposition with T. Rogers; B. Weisenberg and contingency counsel.	2.50	1,912.50
09/24/19	EBW	Telephone Call(s) Greehey - Rule 26 conference with B. Weisenberg and opposing counsel.	.80	612.00

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NEW YORK, NY 10169-0075

Client/Matter: 22126/0902
Page 17

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/25/19	EBW	Conference(s) In Office Lincoln - conference with T. Rogers and contingency counsel in preparation for deposition.	.70	535.50
09/25/19	EBW	Preparation of Legal Papers Greehey - preparation of answer to counterclaim.	.90	688.50
09/26/19	EBW	Telephone Call(s) Lincoln - teleconference with T. Rogers regarding deposition.	.20	153.00
09/26/19	EBW	Preparation for Court Greehey - preparation for case management conference.	.80	612.00
09/26/19	EBW	Attend Court Greehey - attendance at case management conference.	2.00	1,530.00
09/26/19	JKH	Prepare Legal Papers Greehey - Preparing document binder for hearing re case management	.30	88.50
09/27/19	JSF	Examine Documents Arabella - Status of Term Sheet and Open Items	.40	322.00
09/30/19	BSW	Preparation of Memorandum Pro Player: Drafted motion to dismiss	2.50	925.00

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Client/Matter: 22126/0902
Page 18

December 23, 2019
BILL NO. 206900

TOTAL PHASE P01 90.00 \$63,569.00

Phase: P02 Asset Disposition

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/19	JSF	Examine Documents Motion re: BLAB Asset and Payment of Ordinary Course Professional (Description of Status of Asset)	.20	161.00
07/01/19	EBW	Telephone Call(s) LC - teleconference with B. Weisenberg and D. Hatchett regarding abandonment issues and follow-up with B. Weisenberg.	.80	612.00
07/01/19	EBW	Analysis of Legal Papers LC - review of abandonment motion.	.70	535.50
07/01/19	PCB	Review File LC Energy - Review and analysis of file and prior APA.	.80	672.00
07/02/19	JSF	Conference(s) in Office Meeting with Receiver to Discuss LC Energy and Arabella	.50	402.50
07/02/19	EBW	Conference(s) In Office LC - conference with Receiver regarding strategy. (EBW portion).	.30	229.50

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

Client/Matter: 22126/0902
Page 19

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/19	EBW	Telephone Call(s) LC - teleconference with Houlihan regarding declaration.	.10	76.50
07/02/19	PCB	Correspondence LC: Correspondence and review of correspondence re: disposition options.	.40	336.00
07/03/19	EBW	Correspondence LC - correspondence with receivership team regarding strategy.	.40	306.00
07/03/19	EBW	Correspondence LC - correspondence with receivership team regarding strategy.	.30	229.50
07/03/19	EBW	Preparation of Legal Papers LC - review of draft motion.	.40	306.00
07/08/19	JSF	Telephone Call(s) LC Energy - Call with Greg Jensen of ERC and Brent Weisenberg; Curt Solsvig and David Hatchett	.50	402.50
07/08/19	JSF	Telephone Call(s) LC Energy - Follow-Up Call with Brent Weisenberg; Curt Solsvig and David Hatchett re: Response to ERC	.40	322.00

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

Client/Matter: 22126/0902
Page 20

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/08/19	JSF	Examine Documents LC Energy - Review Draft of Proposed E-Mail Outlining Proposed Response to ERC	.20	161.00
07/08/19	EBW	Preparation for Conference LC - preparation for teleconference with management company.	.30	229.50
07/08/19	EBW	Telephone Call(s) LC - teleconference with Receivership team and management company; immediately followed by teleconference with Receivership team.	.90	688.50
07/08/19	EBW	Correspondence LC - correspondence with Receivership team regarding strategy and review of draft pleadings.	.80	612.00
07/08/19	EBW	Correspondence Securities - attention to securities disposition issues.	.20	153.00
07/09/19	EBW	Analysis of Legal Papers LC - analysis of disposition issues.	1.20	918.00
07/09/19	PCB	Review Documents Blink Charging - Review and sign-off of proposed Rule 144 letter for Blink Charging stock.	.50	420.00

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

Client/Matter: 22126/0902
Page 21

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/09/19	PCB	Correspondence Blink Charging - Correspondence and review of correspondence re: disposition of Blink Charging stock.	.40	336.00
07/10/19	EBW	Telephone Call(s) LC - preparation for teleconference with bidder.	.30	229.50
07/10/19	EBW	Telephone Call(s) LC - teleconference with B. Weisenberg and counsel for bidder; as well as post-call with B. Weisenberg.	.70	535.50
07/10/19	EBW	Correspondence LC - correspondence with receivership team regarding pending legal issues.	.30	229.50
07/10/19	EBW	Analysis of Legal Papers LC - analysis of LC Energy issues.	.60	459.00
07/11/19	EBW	Correspondence LC - correspondence with receivership team regarding disposition issues.	.80	612.00
07/11/19	EBW	Correspondence LC - correspondence with receivership team regarding disposition issues.	.40	306.00

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

Client/Matter: 22126/0902
Page 22

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/12/19	JSF	Examine Documents LC Energy - Correspondence on Update of Status and Options	.40	322.00
07/12/19	EBW	Telephone Call(s) LC - teleconference with environmental and local counsel regarding strategy.	.90	688.50
07/15/19	JSF	Examine Documents Review of Asset Sales and Status of Active Assets Under Review	2.90	2,334.50
07/15/19	JSF	Examine Documents LC Energy - West Pocohontas Status	.30	241.50
07/15/19	EBW	Analysis of Legal Papers LC - analysis of draft pleadings.	1.30	994.50
07/15/19	EBW	Conference(s) In Office LC - conference with B. Weisenberg regarding status and strategy.	.50	382.50
07/15/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence with Houlihan Lokey.	.50	420.00
07/16/19	JSF	Examine Documents LC Energy - Western Pocohontas Amendment to Lease and Draft Letter	.40	322.00

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

Client/Matter: 22126/0902
Page 23

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/16/19	JSF	Examine Documents Receivership Property List	.40	322.00
07/16/19	JSF	Examine Documents LC Energy - Status of Abandonment and Other Options	.50	402.50
07/16/19	JSF	Examine Documents Goldin Update on Assets	.40	322.00
07/16/19	JSF	Examine Documents LC Energy - Abandonment Motion	.40	322.00
07/16/19	EBW	Correspondence LC - correspondence with receivership team regarding strategy.	.30	229.50
07/16/19	EBW	Correspondence LC - correspondence with ERC regarding status.	.50	382.50
07/17/19	JSF	Telephone Call(s) LC Energy - Conference Call with Brent Weisenberg and Curt Solsvig re: Status and Report to Receiver	.30	241.50
07/17/19	EBW	Telephone Call(s) LC - teleconference with receivership team regarding strategy.	.30	229.50

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

Client/Matter: 22126/0902
Page 24

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/18/19	JSF	Telephone Call(s) Meeting with Receiver to Discuss LC Energy and Abdala	.50	402.50
07/18/19	JSF	Examine Documents LC Energy Abandonment Motion Draft	.60	483.00
07/18/19	EBW	Preparation for Conference LC - preparation for conference with receiver.	.20	153.00
07/18/19	EBW	Conference(s) In Office LC - conference with Receiver; J. Feeney and B. Weisenberg regarding status and strategy.	.80	612.00
07/18/19	EBW	Conference(s) In Office Dispositions - conference with B. Weisenberg regarding dispositions.	.30	229.50
07/18/19	EBW	Correspondence Abdala - correspondence with counsel for purchaser regarding post-closing issues.	.20	153.00
07/18/19	PCB	Telephone Call(s) LC Energy - Telephone call with MLC.	.30	252.00
07/19/19	JSF	Telephone Call(s) Abdala - Call with Counsel to Centerbridge re: post-closing issues	.30	241.50

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

Client/Matter: 22126/0902
Page 25

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/19/19	JSF	Examine Documents Abdala - Receiver re Results of Testing	.20	161.00
07/19/19	EBW	Telephone Call(s) LC - teleconference with ERC regarding disposition	.10	76.50
07/19/19	EBW	Correspondence LC - correspondence with receivership team regarding disposition issues.	.20	153.00
07/19/19	EBW	Telephone Call(s) Abdala - teleconference with buyer's counsel regarding post-closing issues.	.30	229.50
07/19/19	PCB	Review File LC Energy - Review and analysis of LC Energy existing agreements.	1.10	924.00
07/19/19	PCB	Correspondence LC Energy - Correspondence re: LC Energy existing documents.	.30	252.00
07/22/19	EBW	Correspondence LC - preparation of settlement offer correspondence.	1.20	918.00
07/23/19	EBW	Correspondence LC Energy - preparation of correspondence with ERC.	.60	459.00

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

Client/Matter: 22126/0902
Page 26

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/24/19	JSF	Examine Documents LC Energy - 2014 Sale Documents re: Description of Assets	.20	161.00
07/24/19	JSF	Telephone Call(s) LC Energy - Call with Representatives of Quirk/ERC (Permittee)	.60	483.00
07/24/19	JSF	Telephone Call(s) LC Energy - Follow-Up Call with Curt Solsvig re: Quirk/ERC Discussions	.20	161.00
07/24/19	JSF	Examine Documents LC Energy - Assets Available for Sale	.30	241.50
07/24/19	EBW	Telephone Call(s) LC Energy - teleconference with ERC regarding disposition.	.70	535.50
07/24/19	EBW	Telephone Call(s) LC Energy - teleconference with R. Saltzman regarding disposition issues.	.10	76.50
07/24/19	EBW	Correspondence LC - correspondence with receivership team regarding disposition issues and analysis of same.	1.70	1,300.50
07/24/19	EBW	Telephone Call(s) Abdala - teleconference with R. Saltzman regarding post-disposition issues.	.30	229.50

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

Client/Matter: 22126/0902
Page 27

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/24/19	PCB	Review Documents LC Energy - Review and analysis of Asset Purchase Agreement between Lily Group and LC Energy; as well as Disclosure Schedules thereto.	1.70	1,428.00
07/24/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence re: LC Energy sale term sheet.	.40	336.00
07/24/19	PCB	Conference(s) In Office LC Energy - Conference with co-counsel re: LC Energy sale.	.30	252.00
07/25/19	JSF	Examine Documents LC Energy - Draft Term Sheet	.60	483.00
07/25/19	EBW	Preparation of Legal Papers LC - attention to preparation of term sheet.	1.10	841.50
07/25/19	PCB	Review Documents LC Energy - Review and analysis of Sale Order and Valuation Report.	.80	672.00
07/25/19	PCB	Review File LC Energy - Review precedent re: asset purchase term sheet.	.60	504.00

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

Client/Matter: 22126/0902
Page 28

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/25/19	PCB	Preparation of Documents LC Energy - Initial drafting of Asset Purchase Agreement Term Sheet.	2.80	2,352.00
07/25/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence re: LC Energy Asset Purchase Term Sheet.	1.00	840.00
07/25/19	PCB	Revision of Documents LC Energy - Revise and finalize LC Energy Asset Purchase Term Sheet.	1.10	924.00
07/26/19	JSF	Examine Documents Goldin Status Report on Asset Portfolio	1.80	1,449.00
07/26/19	JSF	Examine Documents LC Energy - Term Sheet and Status of Negotiations	.40	322.00
07/26/19	EBW	Correspondence LC - correspondence with ERC as well as with receivership team regarding disposition strategies and inquiries from ERC.	1.20	918.00
07/26/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence; including detailed response to buyer's due diligence list.	1.20	1,008.00

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

Client/Matter: 22126/0902
Page 29

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/30/19	JSF	Examine Documents LC Energy - Lease Agreements and Other Documents for ERC/Quest	.60	483.00
07/30/19	JSF	Correspondence LC Energy: Correspondence with ERC/Quest re: Western Pocahontas Leases	.30	241.50
07/30/19	EBW	Correspondence LC - correspondence with ERC and receivership team regarding status and strategy.	.70	535.50
07/30/19	EBW	Correspondence Abdala - attention to local counsel issues.	.10	76.50
07/30/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence re: APA term sheet.	.70	588.00
07/30/19	PCB	Review Documents LC Energy - Review and analysis of LC Energy real estate leases and related documents.	1.10	924.00
07/31/19	JSF	Telephone Call(s) LC Energy - Conference Call with ERC Representatives	.20	161.00
07/31/19	JSF	Examine Documents LC Energy - Correspondence with ERC re: Possible Sale	.40	322.00

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

Client/Matter: 22126/0902
Page 30

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/31/19	EBW	Telephone Call(s) LC - teleconference with ERC and receivership team regarding sale issues.	.20	153.00
07/31/19	EBW	Correspondence LC - correspondence with receivership team regarding sale issues.	.40	306.00
07/31/19	PCB	Conference call(s) LC Energy - working group conference call.	.30	252.00
07/31/19	PCB	Prep. for conference call LC Energy - preparation for working group conference call.	.50	420.00
08/01/19	JSF	Examine Documents LC Energy -Term Sheet with ERC	.20	161.00
08/01/19	EBW	Correspondence LC - correspondence and teleconferences with ERC and receivership team regarding disposition.	1.80	1,377.00
08/01/19	PCB	Review File LC Energy - Review and analysis of correspondence and term sheet precedent.	.50	420.00
08/01/19	PCB	Revision of Documents LC Energy - Revision of sale term sheet.	1.10	924.00

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

Client/Matter: 22126/0902
Page 31

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/01/19	PCB	Review/Revision of Documents LC Energy - Review and revision of purchase and sale term sheet.	1.30	1,092.00
08/01/19	PCB	Correspondence LC Energy - Correspondence re: term sheet.	.30	252.00
08/02/19	EBW	Correspondence LC - correspondence with ERC and receivership team regarding disposition.	.60	459.00
08/02/19	EBW	Analysis of Legal Papers LC - attention to disposition issues.	.40	306.00
08/05/19	EBW	Conference(s) In Office LC - conference with B. Weisenberg regarding APA issues.	.20	153.00
08/05/19	EBW	Telephone Call(s) LC - teleconference with ERC regarding disposition issues.	.10	76.50
08/05/19	EBW	Conference(s) In Office LC - conference with Receiver and W. Moran regarding strategy.	.20	153.00
08/06/19	EBW	Telephone Call(s) LC - teleconferences with ERC regarding disposition.	.40	306.00

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

Client/Matter: 22126/0902
Page 32

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/06/19	EBW	Preparation of Legal Papers LC - revisions to correspondence and disposition agreements.	.70	535.50
08/08/19	EBW	Analysis of Legal Papers LC - attention to disposition issues.	.40	306.00
08/09/19	EBW	Telephone Call(s) LC - teleconference with B. Weisenberg regarding disposition issues.	.20	153.00
08/11/19	EBW	Preparation of Legal Papers LC - Revisions to disposition agreement.	.50	382.50
08/13/19	EBW	Preparation for Conference Administrative - preparation for bi-weekly team meeting.	.20	153.00
08/13/19	EBW	Telephone Call(s) Abdala - conference call with receiver and buyer's counsel regarding post-closing issues.	.60	459.00
08/13/19	PCB	Prep. for conference call Preparation for weekly team meeting.	.50	420.00
08/13/19	PCB	Review/Revision of Documents LC Energy - Review and revision of draft Asset Purchase Agreement.	2.10	1,764.00

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

Client/Matter: 22126/0902
Page 33

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/14/19	PCB	Review/Revision of Documents LC Energy - Review and revision of Asset Purchase Agreement.	1.30	1,092.00
08/14/19	PCB	Due Diligence Research LC Energy - Due diligence research re: LC Energy APA.	.80	672.00
08/14/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence re: APA.	.50	420.00
08/15/19	JSF	Examine Documents Goldin Asset Portfolio Overview - Status	1.30	1,046.50
08/15/19	PCB	Review/Revision of Documents LC Energy - Review and comment on purchaser's markup of APA.	1.60	1,344.00
08/15/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence.	.50	420.00
08/16/19	JSF	Examine Documents Abdala - Report on Gold Deposit Findings	.30	241.50
08/16/19	JSF	Examine Documents Review Status of Remaining Possible Monetizations in Asset Portfolio	1.20	966.00

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

Client/Matter: 22126/0902
Page 34

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/16/19	EBW	Analysis of Legal Papers Abdala - analysis of post-closing issues.	.40	306.00
08/16/19	EBW	Analysis of Legal Papers LC - attention to APA issues.	.40	306.00
08/19/19	JSF	Examine Documents LC Energy - Status of Sale	.30	241.50
08/19/19	EBW	Conference(s) In Office Dispositions - conference with B. Weisenberg regarding LC; Greehey; Navidea and other matters.	.50	382.50
08/19/19	EBW	Analysis of Legal Papers Abdala - attention to post-disposition issues.	.20	153.00
08/19/19	EBW	Analysis of Legal Papers Arabella - attention to post-mediation issues.	.10	76.50
08/19/19	PCB	Review File Abdala - Review file re: bid process correspondence.	1.00	840.00
08/19/19	PCB	Correspondence Abdala - Correspondence and review of correspondence.	.50	420.00

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

Client/Matter: 22126/0902
Page 35

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/20/19	JSF	Examine Documents LC Energy - Notice of Sale	.80	644.00
08/20/19	EBW	Analysis of Legal Papers Abdala - analysis of post-disposition issues.	.40	306.00
08/20/19	EBW	Analysis of Legal Papers LC - revisions to sale motion and papers.	.80	612.00
08/20/19	EBW	Conference(s) In Office Abdala - conference with W. Moran regarding post-disposition issues.	.30	229.50
08/20/19	WMM	Legal services/Legal Papers Abdala: analysis of post-closing issues	2.80	2,226.00
08/21/19	JSF	Examine Documents Abdala - analysis of post-closing issues	.20	161.00
08/21/19	JSF	Examine Documents LC Energy - Sale Papers and Bid Procedures Requirements	.60	483.00
08/21/19	EBW	Analysis of Legal Papers LC - analysis of issues regarding sale.	.80	612.00

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

Client/Matter: 22126/0902
Page 36

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/21/19	EBW	Conference(s) In Office Abdala - conference with receiver and P. Berg regarding post-closing issues; including teleconference with seller's counsel.	1.30	994.50
08/21/19	EBW	Analysis of Legal Papers Abdala - analysis of post-closing issues.	.40	306.00
08/21/19	PCB	Review Documents Abdala - analysis of post-closing issues	.60	504.00
08/21/19	PCB	Conference(s) In Office Abdala - Conferences with colleagues.	.40	336.00
08/21/19	PCB	Review/Revision of Documents LC Energy - Review and comment on APA approval order filings.	1.40	1,176.00
08/21/19	PCB	Correspondence LC Energy - Correspondence re: court filings.	.40	336.00
08/21/19	WMM	Legal services/Legal Papers Abdala: analysis of post-closing communications with buyer and related documents	3.50	2,782.50
08/22/19	JSF	Prepare Legal Papers LC Energy - Review and Provide Comments to LC Energy Sale Papers	.40	322.00

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

Client/Matter: 22126/0902
Page 37

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/22/19	EBW	Preparation of Legal Papers LC Energy - revision to notice of sale.	.80	612.00
08/22/19	EBW	Review Documents Abdala - analysis of documents and issues relating to disposition.	1.80	1,377.00
08/23/19	JSF	Prepare Legal Papers LC Energy - Review and Provide Comments to LC Energy Sale Papers	1.20	966.00
08/23/19	EBW	Review Documents Abdala - analysis of post-disposition issues.	1.80	1,377.00
08/23/19	PCB	Correspondence Abdala - Correspondence and review of correspondence re: post-disposition issues	.60	504.00
08/26/19	JSF	Examine Documents LC Energy - Sale Pleadings	.60	483.00
08/26/19	JSF	Conference(s) in Office Abdala - Meeting re: post-disposition issues	1.10	885.50
08/26/19	EBW	Conference(s) In Office Abdala - team conference regarding post-disposition issues. (EBW portion).	1.20	918.00

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

Client/Matter: 22126/0902
Page 38

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/26/19	EBW	Preparation of Legal Papers LC - finalize notice of sale and related papers.	.80	612.00
08/26/19	PCB	Prep. for conference call Abdala - Preparation for conference call.	.40	336.00
08/26/19	PCB	Conference call(s) Abdala - Working group conference call.	.90	756.00
08/27/19	JSF	Prepare Bill of Sale LC Energy - Review and Finalize for Filing the Notice of Successful Bidder; Declaration and Order	1.50	1,207.50
08/27/19	JSF	Examine Documents Asset Disposition Status Update	1.20	966.00
08/27/19	EBW	Preparation of Legal Papers LC - attention to filing and service issues re: notice of sale; and associated correspondence.	.40	306.00
08/27/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence re: APA.	.50	420.00
08/27/19	WMM	Legal services/Client Abdala: continued analysis of post-closing issues	3.50	2,782.50

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

Client/Matter: 22126/0902
Page 39

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/28/19	JSF	Examine Documents Review Status of Asset Review and Disposition	2.60	2,093.00
08/28/19	EBW	Analysis of Legal Papers LC - attention to post-filing issues.	.20	153.00
08/28/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence.	.60	504.00
08/28/19	WMM	Legal services/Legal Papers Abdala: continued analysis of post-closing issues	4.70	3,736.50
08/29/19	PCB	Review File Abdala - Review and analysis of file.	1.10	924.00
08/29/19	WMM	Legal services/Legal Papers Abdala: continued analysis of post-closing issues	2.90	2,305.50
08/30/19	JSF	Examine Documents Asset Review Status and Open Issues	.50	402.50
08/30/19	WMM	Legal services/Legal Papers Abdala: Continue analysis of post-closing issues	3.00	2,385.00

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

Client/Matter: 22126/0902
Page 40

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/03/19	EBW	Telephone Call(s) Abdala - teleconference with R. Saltzman regarding post-disposition issues.	.20	153.00
09/03/19	EBW	Preparation for Conference Abdala - preparation for conference with buyer.	.40	306.00
09/03/19	WMM	Legal services/Legal Papers Abdala: Continue analysis and revising memo.	.50	397.50
09/04/19	JSF	Examine Documents Abdala: Analysis re: Post-Closing Matters	.30	241.50
09/04/19	WMM	Legal services/Legal Papers Abdala: Continue analysis and revisions to memo; communications concerning same; communications concerning report.	4.70	3,736.50
09/05/19	EBW	Preparation for Conference Abdala - preparation for conference with buyer and buyer's counsel.	.80	612.00
09/05/19	EBW	Conference(s) In Office Abdala - conference with Receiver; B. Moran; buyer; buyer's counsel; Goldin and Houlihan regarding post-sale issues.	1.00	765.00

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

Client/Matter: 22126/0902
Page 41

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/05/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence re: closing of sale.	.40	336.00
09/05/19	PCB	Correspondence Abdala - Correspondence and review of correspondence re: Otterbourg meeting.	.40	336.00
09/05/19	WMM	Legal services/Legal Papers Abdala: Analyze report from White & Case; revising memo; prepare for and participate in conference regarding same.	4.00	3,180.00
09/06/19	EBW	Preparation for Conference Dispositions - preparation for team meeting.	.50	382.50
09/06/19	PCB	Review Documents Abdala - Review and analysis of Purchase; Sale & Royalty Agreement.	.90	756.00
09/09/19	EBW	Analysis of Legal Papers LC Energy - attention to disposition issues.	.30	229.50
09/09/19	PCB	Correspondence LC Energy - Correspondence re: APA closing.	.30	252.00
09/10/19	JSF	Examine Documents LC Energy Sale - WPPLP Statement/Objection	.40	322.00

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

Client/Matter: 22126/0902
Page 42

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/11/19	JSF	Examine Documents LC Energy - Certificate of No Objection and Related Exhibits for Filing	.60	483.00
09/11/19	JSF	Prepare Legal Papers LC Energy - Revise Proposed Order Approving Sale	.80	644.00
09/11/19	PCB	Review Documents LC Energy - Review and analysis of response to Receiver's sale motion and related correspondence.	.70	588.00
09/12/19	JSF	Examine Documents LC Energy -Entered Sale Order	.20	161.00
09/12/19	PCB	Review Documents LC Energy - Review and analysis of Approval Order and related documents.	.50	420.00
09/12/19	PCB	Correspondence LC Energy - Correspondence re: transaction closing logistics.	.40	336.00
09/18/19	EBW	Correspondence LC - correspondence with P. Berg and buyer regarding closing issues.	.10	76.50
09/18/19	PCB	Review File LC Energy - Review APA and precedent file for required closing documentation.	.80	672.00

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

Client/Matter: 22126/0902
Page 43

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/18/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence re: closing.	.50	420.00
09/19/19	PCB	Review File LC Energy - Review ancillary closing document precedent.	.50	420.00
09/19/19	PCB	Preparation of Documents LC Energy - Preparation of Bill of Sale.	1.00	840.00
09/19/19	PCB	Preparation of Documents LC Energy - Preparation of Assignment and Assumption of Cash Collateral.	.80	672.00
09/19/19	PCB	Review/Revision of Documents LC Energy - Review and revision of form of Quitclaim Deed.	1.40	1,176.00
09/19/19	PCB	Correspondence LC Energy - Correspondence re: closing and ancillary closing documents.	.60	504.00
09/19/19	PCB	Due Diligence Research LC Energy - Due diligence research and research re: deed requirements.	.90	756.00
09/19/19	PCB	Telephone Call(s) LC Energy - Teleconference re: closing.	.40	336.00

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

Client/Matter: 22126/0902
Page 44

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/20/19	JSF	Examine Documents LC Energy - Closing Status	.20	161.00
09/20/19	EBW	Correspondence LC - correspondence with buyer and receivership team regarding closing issues.	.40	306.00
09/20/19	PCB	Correspondence LC Energy - Correspondence and review of correspondence re: closing of sale.	.70	588.00
09/20/19	PCB	Attend Closing LC Energy - Closing of sale of LC Energy including final review; compiling fully-executed closing docs; wire transfer; post-closing clean up and filing.	2.80	2,352.00
09/23/19	PCB	Revision of Documents LC Energy - Post closing clean-up and filing including correction to assignment schedule.	.70	588.00
09/23/19	PCB	Correspondence Abdala - Review of correspondence re: meeting.	.40	336.00
09/23/19	WMM	Legal services/Client Abdala: Communications concerning status with Buyer and review file.	.20	159.00

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

Client/Matter: 22126/0902
Page 45

December 23, 2019
BILL NO. 206900

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
TOTAL PHASE P02		158.40	\$127,140.00

Phase: P04	Case Administration
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/19 JSF	Examine Documents Objection to Salfati Motion for Payment	.40	322.00
07/01/19 EBW	Preparation of Legal Papers Employees - revisions to opposition to Salfati motion.	1.80	1,377.00
07/01/19 JKH	Analyze Documents Defendants - reviewing criminal transcripts	.60	177.00
07/01/19 JKH	Pacer-Docket Check Defendants - Reviewing criminal docket and various motions and responses re curative jury instructions	.90	265.50
07/02/19 EBW	Conference(s) In Office Employees - conference with Receiver regarding IT contract. (EBW portion).	.10	76.50
07/02/19 EBW	Telephone Call(s) Investor - teleconference with investor regarding inquiry as to status.	.10	76.50

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

Client/Matter: 22126/0902
Page 46

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/19	EBW	Preparation of Legal Papers Employees - finalize and file opposition to Salfati motion; including correspondence to court.	2.40	1,836.00
07/02/19	ACS	Correspondence w/Adversary E-mail to S. Rhodes re S&W	.10	86.50
07/02/19	ACS	Analysis of Brief for motion Review opposition to Salfati motion and comment	.40	346.00
07/02/19	ACS	Telephone Call(s) w/Adversary Telecon S. Rhodes re S&W	.30	259.50
07/02/19	JKH	Analyze Documents Defendants - Reviewing all criminal trial transcripts received and preparing organizational chart of same	2.60	767.00
07/02/19	JKH	Analyze Documents Preparation and review of Salfati Objection; including redactions; preparation of exhibits and preparing letter and chamber copies	1.60	472.00
07/03/19	JSF	Examine Documents Prepare Review for Town Hall and Next Status Report	1.40	1,127.00

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

Client/Matter: 22126/0902
Page 47

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/08/19	JSF	Examine Documents Questions from Investors for Town Hall	.60	483.00
07/08/19	EBW	Correspondence Investors - attention to investor communication issues; including review of questions for investor forum.	.60	459.00
07/08/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon S Rhodes re S&W	.10	86.50
07/08/19	JKH	Correspondence Defendants - email exchanges regarding additional criminal trial transcripts	.30	88.50
07/09/19	JSF	Memo Notice of Change of Date for Webinar and Posting for Investors	.60	483.00
07/09/19	EBW	Analysis of Legal Papers Defendants - analysis of issues relating to criminal jury verdict.	1.20	918.00
07/09/19	ACS	Telephone Call(s) S&W CAMP conference	1.20	1,038.00
07/10/19	JSF	Examine Documents Investors: Proposed Notice to Investors re: Criminal Trial	.20	161.00

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

Client/Matter: 22126/0902
Page 48

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/10/19	EBW	Telephone Call(s) Defendants - teleconference with counsel for SanFilippo regarding advancement.	.20	153.00
07/10/19	EBW	Correspondence Defendants - correspondence with Receivership team regarding criminal verdict issues.	.40	306.00
07/10/19	JKH	Diary & Docket Defendants - review of criminal docket regarding verdict and post-trial schedule; calendaring all relevant dates	.20	59.00
07/11/19	JSF	Telephone Call(s) Trey Rogers - Team Meeting; Agenda Items and Criminal Trial	.20	161.00
07/11/19	JSF	Prepare Legal Papers Agenda for Team Meeting	1.20	966.00
07/11/19	JSF	Examine Documents Application to Pay Maslon Firm	.30	241.50
07/11/19	EBW	Review Documents Investors - attention to website and investor communications.	.70	535.50
07/12/19	JSF	Examine Documents SFAR for Second Quarter	.40	322.00

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

Client/Matter: 22126/0902
Page 49

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/12/19	JSF	Prepare Legal Papers Status Report for Second Quarter	.80	644.00
07/12/19	JSF	Examine Documents Cash Receipts and Disbursements	.30	241.50
07/15/19	JSF	Prepare Legal Papers Status Report of Receiver	3.60	2,898.00
07/15/19	JSF	Examine Documents Motion for Payment of Maslon Firm Fees	.40	322.00
07/16/19	JSF	Prepare Legal Papers Further Revisions to Status Report	1.90	1,529.50
07/16/19	EBW	Telephone Call(s) Investors - teleconference with investor regarding K1.	.10	76.50
07/16/19	ACS	Review/correct Legal Papers Edit S&W draft status update and email to S&W and SEC	.20	173.00
07/16/19	JKH	Prepare Legal Papers Black Elk - preparing PPLO suppression letters	.80	236.00
07/16/19	JKH	Prepare Legal Papers Preparing Motion to Approve Maslon Fees for filing	.30	88.50

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

Client/Matter: 22126/0902
Page 50

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/16/19	JKH	Prepare Legal Papers Preparing letter and courtesy copy to chambers re Motion to Approve Maslon Fees	.20	59.00
07/17/19	JSF	Prepare Legal Papers Updates to Status Report on Assets	1.70	1,368.50
07/17/19	JSF	Correspondence Trey Rogers re: Taxes	.20	161.00
07/17/19	EBW	Analysis of Legal Papers Employees - analysis of order denying Salfati motion.	.30	229.50
07/17/19	EBW	Preparation of Legal Papers Investors - revisions to status report.	1.20	918.00
07/17/19	JKH	Telephone Call(s) w/Clerk of the Court Defendants - telephone call with court re trial exhibits	.10	29.50
07/18/19	PCB	Review Documents Review and comment on draft 8th Quarterly Status Report.	1.50	1,260.00
07/18/19	PCB	Review File Review file re: 8th Quarterly Status Report.	.50	420.00

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

Client/Matter: 22126/0902
Page 51

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/19/19	JSF	Prepare Legal Papers Revise Status Report to Incorporate Comments	1.80	1,449.00
07/19/19	JSF	Correspondence Team re: Next Meeting	.30	241.50
07/19/19	JSF	Examine Documents Cash Flow Projections	.40	322.00
07/21/19	PCB	Review/Revision of Documents Review and comment on revised draft 8th Quarterly Status Report.	1.70	1,428.00
07/22/19	CMO	Analysis of Correspondence Court reporter bid	.30	88.50
07/22/19	JSF	Prepare Legal Papers Review; Revise and Finalize Status Report	1.70	1,368.50
07/22/19	JSF	Correspondence Update to Website re: Taxes	.30	241.50
07/22/19	ACS	Review/correct Legal Papers Review and edit quarterly status report	.80	692.00
07/22/19	JKH	Diary & Docket Arabella - Reviewing email with dates regarding mediation and calendaring same	.20	59.00

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

Client/Matter: 22126/0902
Page 52

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/23/19	JSF	Examine Documents Review of Cash on Hand and Accrued Administrative Expenses	.40	322.00
07/23/19	EBW	Telephone Call(s) Administrative - teleconference with claims agent.	.10	76.50
07/23/19	EBW	Telephone Call(s) Investors - teleconference with W. Edwards to prepare for investor call.	.50	382.50
07/23/19	EBW	Correspondence Administrative - correspondence with counsel for criminal defendant regarding claims.	.40	306.00
07/23/19	JKH	Prepare Legal Papers Preparing and sending chambers copies of Eighth Status Report	.20	59.00
07/24/19	JSF	Prepare Legal Papers Prepare for Town Hall - Outline of Events and Status	2.40	1,932.00
07/24/19	JSF	Examine Documents Review of Receiver's Status Reports for Town Hall	1.20	966.00

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

Client/Matter: 22126/0902
Page 53

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/24/19	EBW	Telephone Call(s) Investors - teleconference with investors and representatives regarding inquiries.	.70	535.50
07/24/19	JKH	Pacer-Docket Check Defendants - reviewing criminal docket and preparing email summary	.40	118.00
07/25/19	JSF	Examine Documents Correspondence re: Navidea Agreement with PPVA	.40	322.00
07/25/19	JSF	Prepare Legal Papers Asset Report and Report on Litigation Re: Town Hall	3.60	2,898.00
07/25/19	EBW	Correspondence PPVA - correspondence with JOL regarding Navidea.	.20	153.00
07/26/19	EBW	Telephone Call(s) Black Elk - teleconference with T. Rogers and Credit Suisse regarding suppression letter.	.10	76.50
07/26/19	GSL	Conference(s) In Office Meeting with EBW - re notices and subpoenas (depositions)	.30	88.50
07/29/19	JSF	Prepare Legal Papers Script for Town Hall	.60	483.00

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

Client/Matter: 22126/0902
Page 54

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/31/19	JSF	Examine Documents Updated Receivership Financial Information	.40	322.00
07/31/19	EBW	Telephone Call(s) PPVA - teleconference with counsel for PPVA and follow-up with T. Rogers regarding items of mutual interest.	.80	612.00
08/01/19	JSF	Examine Documents Review of Status Reports to Prepare for Town Hall	2.20	1,771.00
08/01/19	JSF	Prepare Legal Papers Prepare Outline for Town Hall Script	1.60	1,288.00
08/01/19	EBW	Telephone Call(s) PPVA - teleconference with counsel for PPVA regarding items of mutual interest.	.10	76.50
08/02/19	JSF	Prepare Legal Papers Prepare Script for Town Hall	2.80	2,254.00
08/03/19	EBW	Correspondence Investors - preparation of town hall script.	.70	535.50
08/05/19	EBW	Telephone Call(s) PPVA - teleconference with counsel for PPVA regarding items of mutual interest.	.40	306.00

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

Client/Matter: 22126/0902
Page 55

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/06/19	EBW	Telephone Call(s) PPVA - teleconference with B. Parlin and T. Rogers regarding items of mutual interest.	.40	306.00
08/08/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon S. Rhodes Re: S&W	.20	173.00
08/12/19	JSF	Prepare Legal Papers Review and Update Script for Town Hall	3.10	2,495.50
08/12/19	ACS	Telephone Call(s) w/Adversary Telecon S. Rhodes re S&W	.10	86.50
08/12/19	JKH	Review/analyze S&W - review of categorized fees and preparing and sending email summary of same	.80	236.00
08/13/19	JKH	Diary & Docket S&W - calendar mediation conference	.10	29.50
08/14/19	EBW	Conference(s) In Office Investors - participation in town hall meeting.	1.30	994.50
08/15/19	JSF	Examine Documents Report on Town Hall	.20	161.00
08/15/19	ACS	Preparation of Correspondence Draft description of claims against S&W at request of S&W	.50	432.50

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

Client/Matter: 22126/0902
Page 56

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/16/19	JSF	Examine Documents Receivership Website - Review for Updates	.40	322.00
08/16/19	EBW	Telephone Call(s) PPVA - teleconference with PPVA's counsel regarding items of mutual interest.	.50	382.50
08/19/19	ACS	Attendance at Conference S&W CAMP conference	2.70	2,335.50
08/20/19	JSF	Correspondence Goldin and Otterbourg re: Team Meeting	.10	80.50
08/20/19	EBW	Telephone Call(s) Investors - teleconference with CPA for investor.	.10	76.50
08/20/19	EBW	Correspondence Investors - correspondence with W. Edwards regarding investor inquiry.	.10	76.50
08/20/19	EBW	Conference(s) In Office Administrative - conference with Receiver regarding Abdala; Beechwood and Arabella.	.30	229.50
08/21/19	EBW	Telephone Call(s) Administrative - teleconference with SEC and Receiver regarding status of various assets.	.50	382.50

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

Client/Matter: 22126/0902
Page 57

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/21/19	GSL	Analysis of Correspondence Re - production of third party productions	.30	88.50
08/21/19	JKH	Prepare Legal Papers Preparing service of Stipulation and Order Regarding Lifting of Stay; including cover letter and copy to chambers	.30	88.50
08/21/19	JKH	Pacer-Docket Check Defendants - reviewing government's response to rule 29 and 33 motions; preparing email summary of same	.40	118.00
08/23/19	JSF	Examine Documents Receivership Website - New Postings	.20	161.00
08/23/19	JKH	Correspondence Email communications with Epiq regarding uploading of webinar video	.30	88.50
08/26/19	JSF	Prepare Legal Papers Update to Status Report	.90	724.50
08/26/19	EBW	Correspondence Navidea - correspondence and teleconference with PPVA regarding outstanding issues.	.30	229.50
08/27/19	EBW	Correspondence PPVA - correspondence with T. Rogers and B. Parlin regarding items of mutual concern.	.20	153.00

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

Client/Matter: 22126/0902
Page 58

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/27/19	JKH	Filing Papers in Court Preparing and filing Notice of Successful Bidder Re: LC Energy	.30	88.50
08/27/19	JKH	Prepare Legal Papers Preparing courtesy copy and cover letter to chambers re Notice of Successful Bidder	.20	59.00
08/28/19	EBW	Correspondence Investors - correspondence with team regarding investor inquiries.	.20	153.00
08/28/19	ACS	Telephone Call(s) w/Adversary Telecons S Rhodes re S&W	.20	173.00
08/29/19	ACS	Conference(s) w/ Client Meet with Receiver and EBW re S&W and the participant	.20	173.00
09/04/19	JSF	Examine Documents Review of Platinum Cash Position and Additional Asset Recovery Potentials	.40	322.00
09/04/19	EBW	Review Documents Investors - attention to investor communication issues.	.40	306.00
09/05/19	JSF	Prepare Legal Papers Agenda for Team Meeting	.50	402.50

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

Client/Matter: 22126/0902
Page 59

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/05/19	EBW	Telephone Call(s) PPVA - teleconference with counsel for PPVA regarding items of mutual concern.	.30	229.50
09/06/19	JSF	Examine Documents Review and Respond to Inquiry from Walkers re: PPLO Intermediate/Feeder Funds	.20	161.00
09/09/19	EBW	Correspondence Black Elk - correspondence with Trustee's counsel.	.20	153.00
09/11/19	CMO	Preparation for Court (conference) Prepare file for BSW's attendance at Harris v. ProPlayer conference	.70	206.50
09/11/19	CMO	Preparation for Court (conference) Prepare file for BSW's attendance at Harris v. ProPlayer conference	.70	206.50
09/11/19	JSF	Correspondence Letter to Judge Cogan with Courtesy Copy of Certificate of No Objection	.20	161.00
09/12/19	JSF	Examine Documents Summary of Cash; Projected Assets and Admin Claims	.30	241.50
09/15/19	JSF	Examine Documents Update on Litigations; Claims Review and Open Issues	.60	483.00

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

Client/Matter: 22126/0902
Page 60

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/16/19	EBW	Correspondence Defendants - correspondence with defendant's counsel regarding indemnification.	.10	76.50
09/17/19	JSF	Examine Documents Review of Activities/Stauts for Prep of Next Status Report	.60	483.00
09/17/19	EBW	Preparation of Legal Papers Administrative - attention to status report.	.80	612.00
09/18/19	CMO	Review/correct Correspondence Revise EBW letter to Judge Cogan	.20	59.00
09/19/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon B Weisenberg and prepare for Greehey hearing	.50	432.50
09/20/19	EBW	Correspondence Investors - correspondence with receivership team regarding investor inquiries and distribution analysis.	.30	229.50
09/23/19	JSF	Examine Documents Status Report	.60	483.00
09/23/19	JKH	Analyze Documents Defendants - review of Sanfilpo's motion and related documents	.30	88.50

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

Client/Matter: 22126/0902
Page 61

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/24/19	JSF	Examine Documents Status of Litigation and Other Matters for Update to Investors	.40	322.00
09/24/19	BSW	Preparation of Memorandum Starting drafting legal memorandum in opposition to defendant's motion to compel legal fees	1.50	555.00
09/25/19	BSW	Review file re Legal Papers Reviewed legal documents regarding motion to compel fees for indemnification	1.50	555.00
09/25/19	BSW	Preparation of Memorandum Outlined and continued drafting legal memo in opposition to indemnification	1.40	518.00
09/26/19	JSF	Examine Documents Case Status - Update on Litigations and Other Assets	.60	483.00
09/26/19	EBW	Analysis of Legal Papers Defendants - attention to response to SanFillipo motion to compel.	.40	306.00
09/26/19	EBW	Telephone Call(s) PPVA - teleconference with counsel for PPVA.	.20	153.00

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

Client/Matter: 22126/0902
Page 62

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/26/19	BSW	Preparation of Memorandum Continued drafting motion Re: request for fees	2.60	962.00
09/27/19	EBW	Analysis of Legal Papers Defendants - analysis of issues regarding defendants' acquittal.	.30	229.50
09/27/19	JKH	Diary & Docket Defendants - review article and docket re acquittal and new trial orders	.30	88.50
09/27/19	BSW	Preparation of Memorandum Continued drafting and editing opposition memo for indemnification	1.20	444.00
09/29/19	JSF	Examine Documents Website - Status of Investor Updates	.40	322.00
09/29/19	EBW	Analysis of Legal Papers Defendants - attention to issues regarding indemnification.	.40	306.00
09/29/19	BSW	Preparation of Memorandum Drafted and edited memo of law in opposition to Defendant's motion for immediate indemnification	3.70	1,369.00
TOTAL PHASE P04			101.40	\$69,125.00

Phase: P10

Forensic Accounting

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

Client/Matter: 22126/0902
Page 63

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/03/19	ASH	Review/correct Stipulation Analyze draft protective order	.40	304.00
07/03/19	EBW	Telephone Call(s) Forensics - teleconference and correspondence with counsel for tolling agreement counter-party regarding status.	.40	306.00
07/05/19	ASH	Analysis of Correspondence Letter from counsel for third party regarding issues relating to tolling	.10	76.00
07/05/19	EBW	Correspondence Forensics - correspondence with Receivership team regarding tolling agreements and strategy.	.30	229.50
07/05/19	JKH	Review Documents Reviewing letter from valuation firm regarding termination of tolling agreement; calendaring date re same	.20	59.00
07/08/19	JKH	Draft/revise Updating tolling agreement chart	.20	59.00
07/09/19	EBW	Analysis of Legal Papers Forensics - attention to subpoena issues; including correspondence with counsel for recipients and analysis of form of confidentiality stipulation.	.90	688.50

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

Client/Matter: 22126/0902
Page 64

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/10/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon W Scherer re Cassidy	.30	259.50
07/12/19	ASH	Review/correct Stipulation Revise Confidentiality Stipulation with auditor; analyze background documents regarding same	3.90	2,964.00
07/12/19	ASH	Correspondence w/Adversary E-mail regarding subpoena to Former Valuation Firm	.20	152.00
07/17/19	EBW	Analysis of Legal Papers Forensics - analysis of issues regarding subpoenas and responses.	.50	382.50
07/19/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone conference with counsel for auditor regarding subpoena; e-mail to ACS regarding results of same	.50	380.00
07/19/19	ASH	Examine Documents stipulation and other documents relating to subpoena addressed to auditor	.40	304.00
07/25/19	EBW	Analysis of Legal Papers Forensics - attention to tolling agreements.	.30	229.50

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

Client/Matter: 22126/0902
Page 65

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/25/19	JKH	Prepare Legal Papers Preparing amended tolling agreement and calendaring new termination date	.70	206.50
08/02/19	ASH	Correspondence w/Adversary To counsel regarding documents to be produced	.10	76.00
08/07/19	ASH	Analysis of Stipulation Analyze changes to protective order from counsel for auditor; e-mail to counsel for auditor regarding same; e-mail to ACS regarding same	.30	228.00
08/08/19	ASH	Review/correct Stipulation Revise Protective Order with auditor; review background documents regarding same; e-mail to counsel for auditor regarding same; meeting with ACS regarding same	.80	608.00
08/09/19	JKH	Prepare Legal Papers preparing and sending copy of fully executed amended tolling agreement	.10	29.50
08/14/19	ASH	Telephone Call(s) w/CoCounsel - Other Trey Rogers regarding investor documents	.10	76.00
08/16/19	ASH	Correspondence w/Adversary to counsel for accounting firm regarding subpoena	.20	152.00

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

Client/Matter: 22126/0902
Page 66

December 23, 2019
BILL NO. 206900

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/16/19 ASH	Telephone Call(s) w/CoCounsel - Other Trey Rogers regarding Investor documents	.20	152.00
08/16/19 ASH	Telephone Call(s) w/CoCounsel - Other Investor documents	.60	456.00
08/16/19 JKH	Review Documents Forensics - review Investordocuments	.30	88.50
08/19/19 JKH	Document Review Forensics - reviewing Investor documents	1.40	413.00
08/23/19 ASH	Preparation of Legal Papers notice to custodian regarding possible production of documents	2.60	1,976.00
08/23/19 ASH	Examine Documents Confidentiality agreement with custodian	.50	380.00
08/25/19 ASH	Correspondence w/CoCounsel - Other to counsel for auditor regarding document production	.30	228.00
08/29/19 EBW	Telephone Call(s) Forensics - teleconference with counsel for subpoena respondent.	.20	153.00
09/04/19 ASH	Analysis of Legal Papers Analyze tolling agreements with auditor and valuation firm	.30	228.00

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

Client/Matter: 22126/0902
Page 67

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/04/19	ASH	Correspondence w/Adversary to counsel for valuation firm regarding tolling; to counsel for auditor regarding tolling	.40	304.00
09/04/19	JKH	Review Documents Review of upcoming expirations of tolling agreements	.30	88.50
09/09/19	ASH	Preparation of Legal Papers Second Amended Tolling Agreement Consulting Firm	.60	456.00
09/10/19	ASH	Preparation of Legal Papers second amendment to tolling agreement with valuation firm	1.10	836.00
09/12/19	ASH	Telephone Call(s) w/CoCounsel - Other with counsel regarding tolling agreement with valuation firm	.20	152.00
09/13/19	ASH	Analysis of Legal Papers Executed copy of tolling agreement received from counsel for valuation firm; e-mails with MLC and EBW regarding same	.20	152.00
09/13/19	JKH	Diary & Docket Calendar new tolling expiration Re: Valuation Expert	.10	29.50

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

Client/Matter: 22126/0902
Page 68

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/16/19	ASH	Correspondence w/Adversary to counsel regarding tolling agreement	.20	152.00
09/16/19	JKH	Prepare Legal Papers Preparing cover letters and copies document production from BDO to be sent to experts	.70	206.50
09/23/19	ASH	Preparation of Legal Papers Third Amended Tolling Agreement with accounting firm	2.10	1,596.00
09/23/19	ASH	Correspondence w/Adversary Email to counsel for auditor regarding Third Amended Tolling Agreement	.20	152.00
09/24/19	ASH	Research re Legal Papers Arbitration association rules regarding confidentiality and confidentiality agreement	.20	152.00
09/24/19	ASH	Correspondence w/CoCounsel - Other Brent Weisenberg regarding issue relating to potential confidentiality issue during deposition	.20	152.00
09/25/19	ASH	Preparation of e-mail(s) to MLC regarding tolling agreement with auditor	.10	76.00

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

Client/Matter: 22126/0902
Page 69

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/25/19	JKH	Diary & Docket Review new tolling agreement with accounting firm and calendar new expiration	.10	29.50
09/26/19	ASH	Preparation of e-mail(s) to counsel for auditor regarding tolling agreement; analyze and assemble fully executed tolling agreement	.20	152.00
09/30/19	ASH	Analysis of Court Decision Judge Cogan's decision in criminal trial	.30	228.00
TOTAL PHASE P10			24.50	\$16,758.00

Phase: P13 Travel

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/13/19	JSF	Conference out of Office Travel to Dallas for Mediation in Arabella Matter (Billed at Half)	2.20	1,771.00
08/14/19	JSF	Conference out of Office Arabella - Travel Time to New York From Texas (Billed at Half)	3.00	2,415.00
TOTAL PHASE P13			5.20	\$4,186.00

Phase: P14

BEECHWOOD LITIGATION

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

Client/Matter: 22126/0902
Page 70

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/19	EBW	Telephone Call(s) Beechwood - teleconference with B. Parlin regarding Chapter 15 issues.	.20	153.00
07/01/19	EBW	Correspondence Beechwood - correspondence with counsel regarding depositions and attention to depositions protocol.	.30	229.50
07/01/19	EBW	Correspondence Beechwood - correspondence with P. Poteat and document vendor regarding production issues.	.30	229.50
07/01/19	EBW	Preparation of Legal Papers Beechwood - preparation of limited objection to recognition motion.	.30	229.50
07/01/19	GSL	Analysis/Strategy Research for Limited Objection to Beechwood Re's Renewed Motion for Provisional Relief Pending Recognition	.60	177.00
07/01/19	GSL	Pleadings Prepared Limited Objection to Beechwood Re's Renewed Motion	2.70	796.50

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

Client/Matter: 22126/0902
Page 71

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/19	WMM	Legal services/Client Analyzing flow of funds diagram for Black Elk transactions; and review amended complaint concerning same.	1.70	1,351.50
07/02/19	ASH	Review/correct Subpoena Finalize subpoena to Duff & Phelps	1.10	836.00
07/02/19	ASH	Correspondence w/CoCounsel - Other to process server regarding subpoena to Duff & Phelps	.20	152.00
07/02/19	ASH	Correspondence w/Adversary to all counsel regarding subpoena to Duff & Phelps	.20	152.00
07/02/19	EBW	Preparation of Legal Papers Beechwood - preparation of limited objection to recognition motion.	.80	612.00
07/02/19	EBW	Correspondence Beechwood - correspondence with counsel for PPVA regarding chapter 15 issues.	.40	306.00
07/02/19	EBW	Telephone Call(s) Beechwood - participation in teleconference with Court regarding filing of CNO's reply under seal.	.10	76.50

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

Client/Matter: 22126/0902
Page 72

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/19	EBW	Analysis of Legal Papers Beechwood - analysis of pleadings and documents.	2.40	1,836.00
07/02/19	GSL	Memorandum re Reply brief for motion Edits to Limited Objection to Beechwood Re's Renewed Motion for Provisional Relief	.20	59.00
07/02/19	GSL	Memorandum re Reply brief for motion Prepared new version of Objection - re Joint Limited Objection of PPVA and PPCO to Beechwood Re's Renewed Motion for Provisional Relief	1.60	472.00
07/02/19	JKH	Correspondence Beechwood - preparing and sending email to counsel attaching Beechwood Re Joint Objection	.10	29.50
07/02/19	JKH	Prepare Legal Papers Beechwood - preparing letter and chamber copies re Beechwood Re Joint Objection	.60	177.00
07/03/19	ASH	Analysis of Notice of Deposition Notice of deposition addressed to Receiver; e-mails to co-counsel regarding notice of deposition and scheduling	.30	228.00
07/03/19	EBW	Analysis of Legal Papers Beechwood - review of deposition stipulation and attention to related issues.	1.20	918.00

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

Client/Matter: 22126/0902
Page 73

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/03/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for PPVA regarding deposition stipulation.	.70	535.50
07/03/19	EBW	Analysis of Legal Papers Beechwood - analysis of issues regarding CNO deposition notice.	.60	459.00
07/03/19	WMM	Legal services/Legal Papers Receive and analyze 30(b)(6) notice from CNO and communications concerning same.	.50	397.50
07/05/19	EBW	Correspondence Beechwood - correspondence and teleconference with counsel for Beechwood.	.30	229.50
07/07/19	ASH	Analysis of Legal Papers Analyze documents and agreements regarding Black Elk	1.60	1,216.00
07/07/19	ASH	Research re Opposing brief for motion Review briefs in related action; e-mail to ACS and GSL regarding same	.30	228.00
07/07/19	EBW	Correspondence Beechwood - correspondence with adversaries regarding depositions.	.30	229.50
07/08/19	ASH	Analysis of Legal Papers Review documents regarding Black Elk transactions from Trey Rogers	1.10	836.00

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

Client/Matter: 22126/0902
Page 74

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/08/19	ASH	Correspondence w/CoCounsel - Other To counsel for PPVA liquidator regarding transcripts; analyze docket entries regarding possible additional transcripts	.30	228.00
07/08/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for Beechwood regarding case status.	.30	229.50
07/08/19	EBW	Analysis of Legal Papers Beechwood -attention to chapter 15 issues; including review of debtor's filing.	1.80	1,377.00
07/08/19	EBW	Correspondence Beechwood - correspondence with document vendors.	.40	306.00
07/08/19	EBW	Telephone Call(s) Beechwood - participation in teleconference with adversaries regarding depositions.	.50	382.50
07/08/19	EBW	Analysis of Legal Papers Beechwood - analysis of legal issues regarding depositions.	.60	459.00
07/08/19	JKH	Prepare Legal Papers Beechwood - prepare document binder and index in preparation for Beechwood Re provisional relief hearing	1.30	383.50

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

Client/Matter: 22126/0902
Page 75

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/08/19	WMM	Legal services/Legal Papers Continue analysis of motions to dismiss in preparation of approaching oral argument.	2.50	1,987.50
07/09/19	EBW	Telephone Call(s) Beechwood - teleconference with B. Weisenberg regarding production issues and strategy.	.50	382.50
07/09/19	EBW	Conference(s) In Office Beechwood - conference with W. Moran and B. Weisenberg regarding deposition strategy.	.80	612.00
07/09/19	EBW	Preparation for Court Beechwood - preparation for chapter 15 hearing.	.80	612.00
07/09/19	EBW	Analysis of Legal Papers Beechwood - analysis of deposition issues; including legal research regarding Rule 30(b)(6); and protocols proposal.	.70	535.50
07/09/19	GSL	Analysis/Strategy Reviewed PPVA's draft objection to Beechwood Re Recognition of foreign proceeding	.30	88.50
07/09/19	GSL	Analysis/Strategy Continued preparation for oral argument	.30	88.50

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

Client/Matter: 22126/0902
Page 76

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/09/19	GSL	Analysis/Strategy Research - cases cited by PPVA in objection to Chapter 15 recognition	.50	147.50
07/09/19	JKH	Correspondence Beechwood - review of email from D&P with requested extension	.10	29.50
07/09/19	WMM	Legal services/Client Team conference concerning 30(b)(6) deposition and analyzing notice; communications concerning criminal verdict.	.70	556.50
07/10/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with EBW; WMM and Brent Weisenberg regarding document reviews	.90	684.00
07/10/19	ASH	Analysis of Legal Papers Deposition protocol and extensive correspondence from counsel for PPVA; CNO; SHIP and other parties to litigation regarding same and other discovery-related issues	.40	304.00
07/10/19	ASH	Analysis of Legal Papers various revisions to deposition protocol and extensive correspondence among counsel regarding same	.30	228.00

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

Client/Matter: 22126/0902
Page 77

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/10/19	EBW	Preparation for Conference Beechwood - preparation for teleconference with all counsel regarding depositions.	.20	153.00
07/10/19	EBW	Telephone Call(s) Beechwood - teleconference with all counsel regarding depositions.	.60	459.00
07/10/19	EBW	Conference(s) In Office Beechwood - conference with document vendor regarding analysis.	.90	688.50
07/10/19	EBW	Preparation for Court Beechwood - preparation for Chapter 15 hearing.	.80	612.00
07/10/19	EBW	Attend Court Beechwood - attendance at Chapter 15 hearing.	2.50	1,912.50
07/10/19	GSL	Memorandum re Reply brief for motion Prepared joint objection to Beechwood Re's recognition motion - PPVA and PPCO	2.90	855.50
07/10/19	GSL	Analysis/Strategy Continued chart summarizing criminal trial transcripts Re: Beechwood Claims	2.00	590.00

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

Client/Matter: 22126/0902
Page 78

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/10/19	JKH	Correspondence Beechwood - Review of email with attached letter for document production; communicating with strategic regarding same	.60	177.00
07/10/19	JKH	Review Documents Beechwood - Review of HFF production and updating document production chart	.20	59.00
07/10/19	WMM	Legal services/Client Communications concerning settlement discussions and depositions.	.50	397.50
07/10/19	WMM	Legal services/Legal Papers Communications concerning deposition protocol and locations; reviewing same; conference concerning same.	2.00	1,590.00
07/10/19	WMM	Legal services/Conference Attend conference with litigation team and vendor	.80	636.00
07/10/19	WMM	Legal services/Client Communications concerning designation of 30(b)(6) witness.	.50	397.50
07/10/19	WMM	Legal services/Client Communications concerning issue of stay after criminal trial and application to court.	.50	397.50

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

Client/Matter: 22126/0902
Page 79

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/11/19	ASH	Memorandum to CoCounsel - Other to EBW; Brent Weisenberg and Paul Poteat regarding scope of documents transferred from Global Relay to Relativity; analyze background documents and correspondence regarding same	.60	456.00
07/11/19	ASH	Telephone Call(s) w/CoCounsel - Other telephone calls with counsel for Duff & Phelps regarding subpoenas	.30	228.00
07/11/19	ASH	Analysis of Subpoena Subpoena to Duff & Phelps and documents regarding same	.40	304.00
07/11/19	EBW	Conference(s) In Office Beechwood - conference with receiver regarding status and strategy.	.30	229.50
07/11/19	EBW	Review Documents Beechwood - attention to document analysis issues; including review of complaint and motions to dismiss.	4.20	3,213.00
07/11/19	EBW	Preparation for Conference Beechwood - preparation for teleconference with court regarding criminal trial and scheduling.	.10	76.50

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

Client/Matter: 22126/0902
Page 80

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/11/19	EBW	Telephone Call(s) Beechwood - participation in teleconference with court regarding criminal trial and scheduling.	.20	153.00
07/11/19	EBW	Correspondence Beechwood - correspondence with PPVA regarding document production issues.	.30	229.50
07/11/19	EBW	Telephone Call(s) Beechwood - participation in teleconference with adversaries regarding privilege issues.	.10	76.50
07/11/19	JKH	Document Review Beechwood - reviewing documents in connection with D&P subpoena	.40	118.00
07/11/19	WMM	Legal services/Client Communications concerning direction from court concerning keeping stay in effect.	.50	397.50
07/12/19	GSL	Memorandum re Reply brief for motion Reviewed PPVA's changes to joint objection to Beechwood Re Recognition	.40	118.00
07/12/19	WMM	Legal services/Client Communications concerning continuance of stay and Judge Rakoff's order on security.	.50	397.50

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

Client/Matter: 22126/0902
Page 81

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/12/19	WMM	Legal services/Client Review pleadings and creating search terms	1.70	1,351.50
07/15/19	EBW	Telephone Call(s) Beechwood - teleconference with document vendor regarding analysis.	.30	229.50
07/15/19	EBW	Review Documents Beechwood - analysis of case documents.	4.10	3,136.50
07/15/19	WMM	Legal services/Client Continue reviewing pleadings and motion papers to prepare search terms for Agnes software.	1.90	1,510.50
07/16/19	EBW	Correspondence Beechwood - preparation of correspondence to counsel regarding document production.	.70	535.50
07/16/19	EBW	Correspondence Beechwood - correspondence with document vendor regarding searches.	.20	153.00
07/16/19	EBW	Analysis of Legal Papers Beechwood - analysis of case documents and preparation for hearing on motion to dismiss.	4.60	3,519.00
07/16/19	JKH	Prepare Legal Papers Beechwood - preparing certificate of service re joint objection in Beechwood Re	.30	88.50

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

Client/Matter: 22126/0902
Page 82

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/16/19	JKH	Prepare Legal Papers Beechwood - preparing service of Joint Objection in Beechwood Re; and preparing letter and courtesy copy to chambers	.40	118.00
07/16/19	WMM	Legal services/Legal Papers Receive and review CNO motion papers concerning joinder to joint motion.	.80	636.00
07/17/19	ASH	Preparation of e-mail(s) To counsel for Beechwood responding to question regarding subpoena	.10	76.00
07/17/19	ASH	Analysis of Subpoena Subpoena to Alexis Northwood served by counsel for the CNO defendants	.10	76.00
07/17/19	EBW	Conference(s) In Office Beechwood - conference with receiver regarding strategy.	.30	229.50
07/17/19	EBW	Correspondence Beechwood - correspondence with adversaries regarding discovery issues; including depositions.	.30	229.50
07/17/19	EBW	Telephone Call(s) Beechwood - teleconference with document vendor regarding analysis.	.50	382.50

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

Client/Matter: 22126/0902
Page 83

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/17/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for PPVA regarding items of mutual interest.	.10	76.50
07/17/19	EBW	Analysis of Legal Papers Beechwood - analysis of complaint; motions to dismiss and legal research with respect to hearing preparation and deposition preparation.	3.10	2,371.50
07/17/19	GSL	Analysis/Strategy Research - 30(b)(6) designation requirements	1.30	383.50
07/17/19	GSL	Correspondence w/Adversary Prepared letter to Alston & Bird - 30(b)(6) designee	.50	147.50
07/17/19	GSL	Other Discovery Prepared objections to CNO's 30(b)(6) Notice	1.90	560.50
07/17/19	GSL	Analysis/Strategy Review of Relativity Documents	2.70	796.50
07/17/19	JKH	Document Production Beechwood - review of document productions and sending request information to Agnes	.80	236.00

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

Client/Matter: 22126/0902
Page 84

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/17/19	JKH	Pacer-Docket Check Beechwood - review of docket entries for deadline to file poc in ch. 15 case	1.10	324.50
07/17/19	WMM	Legal services/Legal Papers Conference concerning 30(b)(6) notice to CNO; review and revise same.	.80	636.00
07/18/19	EBW	Telephone Call(s) Beechwood - teleconference with B. Weisenberg and counsel for witness.	.30	229.50
07/18/19	EBW	Correspondence Beechwood - correspondence with CNO regarding discovery and Rule 30(b)(6).	.40	306.00
07/18/19	EBW	Correspondence Beechwood - correspondence with PPVA and other counsel regarding discovery.	.30	229.50
07/18/19	EBW	Analysis of Legal Papers Beechwood - attention to deposition and discovery issues; including teleconferences with Goldin and B. Weisenberg.	.60	459.00
07/18/19	EBW	Preparation for Court Beechwood - preparation for motion to dismiss hearing and depositions.	1.20	918.00

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

Client/Matter: 22126/0902
Page 85

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/18/19	GSL	Correspondence w/Adversary Letter to Alston and Bird - re 30(b)(6) Designee	.50	147.50
07/18/19	JKH	Correspondence Beechwood - email communications with Strategic re sending documents to Agnes	.60	177.00
07/18/19	JKH	Review Documents Beechwood - updating email contact list pursuant to numerous removal requests	.30	88.50
07/18/19	JKH	Document Review Beechwood - Doc review	1.20	354.00
07/18/19	WMM	Legal services/Legal Papers Review final draft of 30(b)(6) notice to BCLIC/WNIC and communications concerning same; review correspondence concerning same.	1.80	1,431.00
07/19/19	ASH	Analysis of Correspondence from arbitrators; ACS and counsel for respondents in arbitration regarding scheduling	.10	76.00
07/19/19	EBW	Correspondence Beechwood - correspondence with vendor regarding production issues.	.30	229.50

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

Client/Matter: 22126/0902
Page 86

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/19/19	EBW	Correspondence Beechwood - correspondence with adversaries regarding supplemental production.	.40	306.00
07/19/19	EBW	Telephone Call(s) Beechwood - teleconference with adversaries regarding depositions and schedule.	.50	382.50
07/19/19	EBW	Telephone Call(s) Beechwood - teleconference with adversaries regarding depositions and schedule.	.10	76.50
07/19/19	EBW	Telephone Call(s) Beechwood - teleconference with adversaries regarding depositions and schedule.	.20	153.00
07/19/19	EBW	Analysis of Legal Papers Beechwood - hearing and deposition preparation.	3.10	2,371.50
07/19/19	GSL	Memorandum re Reply brief for motion Continued draft of section of opposition to motion for SJ	4.10	1,209.50
07/19/19	GSL	Analysis/Strategy Review of Relativity folder - Bodner production	.50	147.50

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

Client/Matter: 22126/0902
Page 87

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/19/19	GSL	Analysis/Strategy Review of deposition list - re notices/subpoenas	.30	88.50
07/19/19	JKH	Analyze Documents Beechwood - Review of Notice of Deposition and calendaring same	.10	29.50
07/19/19	WMM	Legal services/Client Communicaitons concerning settlement proposal to SHIP; consideration of same and communicaitons concerning discovery production.	.80	636.00
07/19/19	WMM	Legal services/Client Attention to deposition scheduling and communications concerning same.	.70	556.50
07/22/19	ASH	Analysis of Brief for motion Meeting with EBW; WMM Brent Weisenberg and GSL regarding current status of litigation and strategy	.50	380.00
07/22/19	ASH	Correspondence w/Adversary to counsel for the Beechwood parties requesting Register	.90	684.00
07/22/19	ASH	Analysis of Legal Papers Note Purchase Agreement and Amended and Restated Security Agreement	.60	456.00

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

Client/Matter: 22126/0902
Page 88

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/22/19	EBW	Telephone Call(s) Beechwood - teleconference with Goldin regarding 30(b)(6).	.10	76.50
07/22/19	EBW	Preparation for Conference Beechwood - preparation for chapter 15 hearing.	.60	459.00
07/22/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for PPVA regarding chapter 15 hearing.	.10	76.50
07/22/19	EBW	Preparation for Conference Beechwood - preparation for conference with SHIP counsel.	.40	306.00
07/22/19	EBW	Conference(s) In Office Beechwood - conferences with litigation team regarding status and strategy. (EBW portion).	1.80	1,377.00
07/22/19	EBW	Preparation for Court Beechwood - preparation for depositions and motion to dismiss hearing.	1.50	1,147.50
07/22/19	GSL	Analysis/Strategy Prepared list of notices and subpoenas for depositions	.50	147.50

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

Client/Matter: 22126/0902
Page 89

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/22/19	GSL	Conference(s) In Office Otterbourg Platinum meeting - re depositions	.50	147.50
07/22/19	GSL	Discovery Continued preparing 30(b)(6) notice of deposition to CNO Defendants	3.60	1,062.00
07/22/19	GSL	Pacer-Docket Check Research - re stay of discovery in SEC action	.30	88.50
07/22/19	JKH	Review Documents Review documents and prepare document binder for recognition hearing	.80	236.00
07/22/19	JKH	Analyze Documents Beechwood - review of PPVA subpoenas	.20	59.00
07/22/19	JKH	Review/analyze Beechwood - reviewing deposition proposal and website and preparing email with comments	.40	118.00
07/22/19	JKH	Document Review Beechwood - doc review Re: Depositions	.90	265.50

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

Client/Matter: 22126/0902
Page 90

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/22/19	WMM	Legal services/Client Team conference concerning 30(b)(6) witness; communications concerning notice of same to CNO and communications concerning SHIP offer.	1.50	1,192.50
07/23/19	ASH	Telephone Call(s) w/CoCounsel - Other Brent Weisenberg regarding Register maintained by BAM Administrative Services; LLC	.10	76.00
07/23/19	ASH	Examine Documents Documents relating to Register maintained by BAM Administrative Services; LLC	.40	304.00
07/23/19	ASH	Correspondence w/Adversary To counsel for the Beechwood parties regarding documents	.70	532.00
07/23/19	EBW	Preparation for Court Beechwood - preparation for chapter 15 hearing.	.50	382.50
07/23/19	EBW	Attend Court Beechwood - attendance at chapter 15 hearing.	3.00	2,295.00
07/23/19	EBW	Conference Out of Office Beechwood - conference with counsel for SHIP regarding status.	1.50	1,147.50

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

Client/Matter: 22126/0902
Page 91

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/23/19	EBW	Telephone Call(s) Beechwood - teleconference with B. Weisenberg regarding status and strategy.	.30	229.50
07/23/19	JKH	Correspondence Beechwood - multiple email exchanges w Agnes and Strategic regarding document productions	.80	236.00
07/23/19	JKH	Document Review Beechwood - doc review Re: Depositions	2.70	796.50
07/23/19	JKH	Analysis of Complaint Beechwood - Review of CNO third party complaint	.80	236.00
07/23/19	JKH	Diary & Docket Beechwood - review of email re new date for oral argument	.10	29.50
07/23/19	JKH	Review/analyze Beechwood - Review of Order re Beechwood re recognition hearing	.20	59.00
07/23/19	JKH	Diary & Docket Beechwood - calendar dates of receiver designee deposition	.10	29.50
07/23/19	WMM	Legal services/Client Attention to oral argument date and communications concerning same	.80	636.00

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

Client/Matter: 22126/0902
Page 92

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/24/19	EBW	Preparation of Legal Papers Beechwood - revisions to deposition notices and subpoenas.	.70	535.50
07/24/19	EBW	Preparation for Court Beechwood - preparation for depositions and argument on motion to dismiss.	1.80	1,377.00
07/24/19	GSL	Discovery Additional changes to 30(b)(6) Notice to CNO Defendants	1.20	354.00
07/24/19	GSL	Analysis/Strategy Continued preparing list of notices/subpoenas for depositions	1.00	295.00
07/24/19	JKH	Correspondence Beechwood - email communications with Agnes re status of documents; providing email update to EBW re same	.30	88.50
07/24/19	JKH	Document Review Beechwood - document review	1.10	324.50
07/24/19	WMM	Legal services/Legal Papers Review draft 30(b)(6) Notice to CNO and communications concerning same; receive and analyze 30(b)(6) Notice from CNO and communications concerning same.	1.00	795.00

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

Client/Matter: 22126/0902
Page 93

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/25/19	ASH	Review/correct Opposing brief for motion Revise and finalize memorandum of law in opposition to motion to dismiss	3.90	2,964.00
07/25/19	ASH	Letter(s)-Accountant to assistant to auditing standards expert and auditing standards expert	.50	380.00
07/25/19	EBW	Conference(s) In Office Beechwood - conference with document consultant regarding review.	1.50	1,147.50
07/25/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for PPVA regarding discovery.	.10	76.50
07/25/19	EBW	Review Documents Beechwood - review of documents in preparation for depositions.	2.50	1,912.50
07/25/19	EBW	Analysis of Legal Papers Beechwood - review of deposition notices.	.20	153.00
07/25/19	EBW	Preparation for Court Beechwood - preparation for hearing.	1.20	918.00
07/25/19	JKH	Review Documents Beechwood - reviewing and calendaring deposition dates Re: Depositions	.40	118.00

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

Client/Matter: 22126/0902
Page 94

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/25/19	JKH	Document Review Beechwood - document review Re: Depositions	1.70	501.50
07/25/19	WMM	Legal services/Client Meeting with J. Snyder of Agnes.	1.00	795.00
07/25/19	WMM	Legal services/Client Data review Re: Depositions	2.50	1,987.50
07/26/19	EBW	Conference(s) In Office Beechwood - conference with G. Leon regarding deposition notices and subpoenas.	.30	229.50
07/26/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for PPVA regarding scheduling and strategy.	.40	306.00
07/26/19	EBW	Correspondence Beechwood - correspondence and teleconferences with adversaries regarding status.	.40	306.00
07/26/19	EBW	Preparation for Court Beechwood - preparation for depositions and oral argument.	3.10	2,371.50

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

Client/Matter: 22126/0902
Page 95

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/26/19	EBW	Review Documents Beechwood - attention to subpoena issues; case scheduling and logistics.	1.20	918.00
07/26/19	GSL	Discovery Prepared and delivered 30(b)(6) Notice to counsel for CNO Defendants	.50	147.50
07/26/19	GSL	Discovery Prepared/delivered Notices to Matt Hall; Eric Johnson; and Tim Bischof; prepared/delivered subpoenas for Brian Wegner; and Paul Lorentz	3.90	1,150.50
07/26/19	JKH	Review Documents Beechwood - reviewing and calendaring additional deposition dates and creating chart regarding same	1.30	383.50
07/26/19	JKH	Correspondence Beechwood - email communications with Agnes and Strategic to coordinate document exchange	.40	118.00
07/26/19	WMM	Legal services/Client Communications concerning deposition scheduling.	.50	397.50
07/26/19	WMM	Legal services/Client Data review Agnes re: Depositions	5.50	4,372.50

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

Client/Matter: 22126/0902
Page 96

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/27/19	EBW	Correspondence Beechwood - correspondence with receivership team and counsel for PPVA regarding logistics.	.40	306.00
07/27/19	JKH	Review Documents Beechwood - reviewing multiple deposition notices and calendaring same	.60	177.00
07/28/19	EBW	Preparation for Court Beechwood - preparation for oral argument on motions to dismiss.	.70	535.50
07/29/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with counsel for Duff & Phelps regarding subpoena; e-mail to EBW and Brent Weisenberg regarding same	.40	304.00
07/29/19	ASH	Correspondence w/Adversary with representatives of DTI regarding printing out compendium of authorities	.30	228.00
07/29/19	EBW	Preparation for Court Beechwood - preparation for oral argument on motions to dismiss.	2.50	1,912.50
07/29/19	EBW	Correspondence Beechwood - correspondence with team and adversaries regarding subpoenas and logistics.	.70	535.50

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

Client/Matter: 22126/0902
Page 97

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/29/19	WMM	Legal services/Client Communications concerning deposition scheduling.	.50	397.50
07/29/19	WMM	Legal services/Client Data search of discovery documents Re: Depositions	6.50	5,167.50
07/30/19	ASH	Preparation of Legal Papers compendium of cases; analyze PACER cites and opposing counsel's citations	1.40	1,064.00
07/30/19	ASH	Correspondence w/Adversary With David Marcou regarding response to subpoena to Duff & Phelps	.30	228.00
07/30/19	ASH	Analysis of Legal Papers Analyze loan register produced by counsel for the Beechwood parties; e-mail to co-counsel at Otterbourg regarding same	.50	380.00
07/30/19	ASH	Analysis of Notice of Deposition Deposition notices served by numerous parties and related correspondence	.20	152.00
07/30/19	EBW	Preparation of Legal Papers Beechwood - preparation of subpoenas.	.60	459.00
07/30/19	EBW	Preparation for Conference Beechwood - preparation for conference with all counsel.	.40	306.00

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

Client/Matter: 22126/0902
Page 98

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/30/19	EBW	Preparation for Court Beechwood - preparation for oral argument on motions to dismiss.	1.80	1,377.00
07/30/19	GSL	Discovery Prepared and sent subpoenas to Paul Lorentz; Brian Wegner and Ed Bonach	2.30	678.50
07/30/19	GSL	Discovery Prepared draft of 30(b)(6) Notice to SHIP	1.10	324.50
07/30/19	GSL	Analysis/Strategy Prepared notes for EBW - re deposition meeting at H&K on 7/31	1.00	295.00
07/30/19	WMM	Legal services/Client Data search.	4.50	3,577.50
07/30/19	WMM	Legal services/Legal Papers Reviewing Notices of Depositions.	.50	397.50
07/31/19	ASH	Examine Documents Analyze documents produced by Duff & Phelps to BCLIC and WNIC and reproduced by the CNO Defendants; analyze related documents	.50	380.00
07/31/19	ASH	Analysis of Legal Papers Confidentiality agreement with respondents in arbitration	.20	152.00

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

Client/Matter: 22126/0902
Page 99

December 23, 2019
BILL NO. 206900

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/31/19 ASH	Correspondence w/CoCounsel - Other With representatives of Strategic regarding location of documents produced by Duff & Phelps within the CNO Defendants' production	.20	152.00
07/31/19 EBW	Conference Out of Office Beechwood - attendance at meeting with all counsel regarding discovery.	3.00	2,295.00
07/31/19 EBW	Review Documents Beechwood - attention to document production issues.	.90	688.50
07/31/19 EBW	Preparation for Court Beechwood - preparation for oral argument on motions to dismiss.	2.30	1,759.50
07/31/19 EBW	Preparation for Conference Beechwood - preparation for conference with counsel.	.30	229.50
07/31/19 GSL	Conference Out of Office Meeting at Holland and Knight - re deposition schedule for consolidated action	2.50	737.50
07/31/19 GSL	Analysis/Strategy Review of third-party productions to the receiver - follow-up to deposition meeting at holland and knight	1.80	531.00

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

Client/Matter: 22126/0902
Page 100

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/31/19	WMM	Legal services/Legal Papers Communications concerning 30(b) (6) Notices; scheduling and depositions.	1.00	795.00
07/31/19	WMM	Legal services/Client Data search.	4.50	3,577.50
08/01/19	ASH	Correspondence w/CoCounsel - Other To Alois Chakabva; Karthik Bhavaraju; Trey Rogers requesting information related to prior production by Duff & Phelps to BCLIC and WNIC	.30	228.00
08/01/19	ASH	Analysis of Correspondence Recent correspondence from numerous parties regarding discovery	.20	152.00
08/01/19	EBW	Correspondence Beechwood - correspondence with adversaries regarding scheduling.	.40	306.00
08/01/19	EBW	Telephone Call(s) Beechwood - teleconference with adversaries regarding scheduling.	.50	382.50
08/01/19	EBW	Preparation for Court Beechwood - preparation for oral argument.	2.50	1,912.50
08/01/19	GSL	Discovery Prepared 30(b) (6) notice to SHIP/Fuzion	.60	177.00

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

Client/Matter: 22126/0902
Page 101

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/01/19	GSL	Analysis/Strategy Review of new document requests in Beechwood-Litigation (Michael Nordlicht and Kevin Cassidy)	.40	118.00
08/01/19	WMM	Legal services/Legal Papers Communications concerning 30(b)(6) notices and reviewing same.	.50	397.50
08/01/19	WMM	Legal services/Client review case documents	2.90	2,305.50
08/02/19	ASH	Examine Documents Analyze document requests and responses from GSL	1.10	836.00
08/02/19	ASH	Analysis of Legal Papers Review notices of deposition and extensive recent correspondence from numerous parties regarding scheduling of depositions	.20	152.00
08/02/19	EBW	Telephone Call(s) Beechwood - teleconference with document vendor regarding review.	.30	229.50
08/02/19	EBW	Correspondence Beechwood - correspondence and teleconference with counsel regarding schedule.	.80	612.00

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

Client/Matter: 22126/0902
Page 102

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/02/19	EBW	Preparation for Court Beechwood - preparation for oral argument on motions to dismiss.	2.10	1,606.50
08/02/19	GSL	Document Production Reviewed discovery requests with ASH - third party notice for document production	.20	59.00
08/02/19	GSL	Telephone Call(s) re: Conference Call with vendor - re document review	.30	88.50
08/02/19	GSL	Document Production Prepared draft notice of production of documents to third parties	.70	206.50
08/02/19	JKH	Review Documents Beechwood - reviewing email communications re deposition schedule; calendaring dates re same	.60	177.00
08/02/19	WMM	Legal services/Client Communications concerning Steinberg meeting and consideration of release for same.	.50	397.50
08/02/19	WMM	Legal services/Client Various communications among counsel concerning 30(b)(6) deposition and scheduling for same.	.50	397.50

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

Client/Matter: 22126/0902
Page 103

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/02/19	WMM	Legal services/Client Conference with team and personnel from vendor.	.50	397.50
08/03/19	EBW	Correspondence Beechwood - correspondence with adversaries regarding discovery.	.40	306.00
08/03/19	EBW	Preparation for Court Beechwood - preparation for hearing on motion to dismiss.	1.20	918.00
08/04/19	EBW	Correspondence Beechwood - correspondence with adversaries regarding discovery.	.40	306.00
08/04/19	EBW	Preparation for Court Beechwood - preparation for hearing on motion to dismiss.	.40	306.00
08/04/19	GSL	Analysis/Strategy Prepared notes summarizing arguments in motions to dismiss - re oral argument	1.10	324.50
08/05/19	EBW	Conference(s) In Office Beechwood - conference with B. Weisenberg regarding strategy.	.20	153.00
08/05/19	EBW	Conference(s) In Office Beechwood - conference with receivership team regarding strategy.	.30	229.50

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

Client/Matter: 22126/0902
Page 104

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/05/19	EBW	Preparation for Court Beechwood - preparation for teleconferences with Court.	.80	612.00
08/05/19	EBW	Telephone Call(s) Beechwood - teleconference with common-interest counsel in advance of call with Court.	.50	382.50
08/05/19	EBW	Telephone Call(s) Beechwood - teleconference with clerk regarding schedule.	.90	688.50
08/05/19	EBW	Telephone Call(s) Beechwood - teleconference with Court regarding schedule.	.70	535.50
08/05/19	EBW	Conference(s) In Office Beechwood - conference with Receiver and W. Moran regarding strategy.	.20	153.00
08/05/19	GSL	Analysis/Strategy Continued preparing summary of arguments in motions to dismiss - re oral argument	4.20	1,239.00
08/05/19	GSL	Conference(s) In Office Otterbourg meeting - re deposition schedule	.20	59.00

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

Client/Matter: 22126/0902
Page 105

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/05/19	JKH	Diary & Docket Reviewing email with new deadline for discovery; calendaring same	.10	29.50
08/05/19	JKH	Conference(s) in Office Beechwood - Discussions with GSL re deposition schedule updates	.20	59.00
08/05/19	WMM	Legal services/Client Team conference concerning depositions; strategy with same and approach with D. Steinberg; communications concerning new Rakoff clerk.	2.50	1,987.50
08/05/19	WMM	Legal services/Client Various communications in preparation for; and participation in; conference with court concerning discovery schedule.	1.50	1,192.50
08/05/19	WMM	Legal services/Client Prepare for and participate in conference with M. Cyganowski; E. Weinick and B. Weisenberg concerning meeting witness.	.50	397.50
08/05/19	WMM	Legal services/Legal Papers Analyzing SHIP brief in prep for oral argument meeting.	2.00	1,590.00
08/06/19	ASH	Analysis of Correspondence David Marcou (counsel for Duff & Phelps)	.10	76.00

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

Client/Matter: 22126/0902
Page 106

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/06/19	EBW	Correspondence Beechwood - correspondence and conference with G. Leon regarding production and scheduling issues.	.40	306.00
08/06/19	EBW	Correspondence Beechwood - correspondence with adversaries regarding scheduling.	.40	306.00
08/06/19	EBW	Review Documents Beechwood - attention to issues regarding witness testimony.	.80	612.00
08/06/19	EBW	Preparation for Court Beechwood - preparation for hearing.	1.20	918.00
08/06/19	GSL	Analysis/Strategy Reviewed list of third party productions to the JOLS (email from PPVA) - In re Platinum Litigation	.30	88.50
08/06/19	GSL	Analysis/Strategy Continued preparing notes summarizing arguments - re oral argument on motions to dismiss	4.50	1,327.50
08/06/19	JKH	Correspondence Beechwood - review of email with new document production; forwarding information to Strategic and Agnes	.40	118.00

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

Client/Matter: 22126/0902
Page 107

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/06/19	JKH	Analyze Documents Beechwood - review of ch. 15 Beechwood Re filing and calendaring objection date	.40	118.00
08/06/19	WMM	Legal services/Legal Papers Receive and review discovery responses and proposed schedule from counsel in response to Judge Rakoff's direction.	.70	556.50
08/06/19	WMM	Legal services/Legal Papers Analyzing BCLIC/WNIC and Beechwood briefs in preparation for oral argument meeting.	4.00	3,180.00
08/07/19	ASH	Correspondence w/Adversary Analyze correspondence from counsel for Duff & Phelps; prepare correspondence to Alois Chakabva regarding same; analyze background documents regarding same	.30	228.00
08/07/19	ASH	Analysis of Resp to disc. device discovery requests served by numerous parties	.20	152.00
08/07/19	EBW	Correspondence Beechwood - correspondence with other parties regarding discovery matters.	.20	153.00
08/07/19	EBW	Preparation for Deposition Beechwood - preparation for depositions.	.90	688.50

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

Client/Matter: 22126/0902
Page 108

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/07/19	EBW	Preparation for Court Beechwood - preparation for oral argument.	4.10	3,136.50
08/07/19	JKH	Correspondence Beechwood - reviewing and responding to email related to D&P document request	.30	88.50
08/07/19	JKH	Document Review Beechwood - reviewing CNO documents for D&P production	.40	118.00
08/07/19	WMM	Legal services/Legal Papers Communications concerning preparation for oral argument; continue analysis of BCLIC/WNIC brief and legal research for responses to arguments in memo as prep for oral argument.	6.90	5,485.50
08/08/19	ASH	Preparation for Court (motion) Analyze SHIP's brief in support of motion to dismiss First Amended Complaint; prepare summary of same	1.80	1,368.00
08/08/19	ASH	Analysis of Correspondence Analyze correspondence from numerous counsel including counsel for the CNO Defendants; the Bodner Group and PPVA setting forth discovery proposals; e-mail to EBW with suggestions regarding same	.20	152.00

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

Client/Matter: 22126/0902
Page 109

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/08/19	ASH	Analysis of Correspondence From Alois Chakabva regarding Duff & Phelps subpoena; analyze excerpts from Complaint from Alois Chakabva relating to same	.20	152.00
08/08/19	ASH	Analysis of Ntc of disc and insp. Served by PBIHL; e-mail to all EBW; Brent Weisenberg and GSL regarding same	.20	152.00
08/08/19	EBW	Correspondence Beechwood - correspondence with adversaries regarding discovery.	.30	229.50
08/08/19	EBW	Preparation for Court Beechwood - preparation for oral argument.	2.40	1,836.00
08/08/19	EBW	Review Documents Beechwood - attention to witness issues.	.70	535.50
08/08/19	GSL	Conference Out of Office Meeting to discuss FAC	2.40	708.00
08/08/19	JKH	Analyze Documents Beechwood - reviewing multiple requests for document production; creating chart and calendaring relevant dates	1.40	413.00
08/08/19	WMM	Legal services/Client Communications concerning deposition protocol and scheduling conference concerning discovery	.50	397.50

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

Client/Matter: 22126/0902
Page 110

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/09/19	EBW	Correspondence Beechwood - correspondence to parties regarding discovery issues and scheduling.	.30	229.50
08/09/19	EBW	Conference(s) In Office Beechwood - conference with B. Weisenberg regarding status and strategy.	1.80	1,377.00
08/09/19	EBW	Conference(s) In Office Beechwood - conference with receiver regarding status and strategy.	.20	153.00
08/09/19	EBW	Preparation for Court Beechwood - preparation for oral argument.	2.50	1,912.50
08/09/19	EBW	Correspondence Beechwood - correspondence with parties regarding chapter 15 motion and analysis of same.	.40	306.00
08/09/19	GSL	Pacer-Docket Check Docket review - Beechwood Re's Chapter 15 motion for comity	.20	59.00
08/09/19	GSL	Analysis/Strategy Continued preparing summary of arguments in motions to dismiss - oral argument	2.40	708.00
08/09/19	JKH	Document Review Beechwood - doc review	3.20	944.00

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

Client/Matter: 22126/0902
Page 111

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/09/19	WMM	Legal services/Legal Papers Continue analysis of BCLIC/WNIC brief and preparing memo for oral argument prep.	6.50	5,167.50
08/10/19	EBW	Preparation for Court Beechwood - preparation for oral argument.	5.50	4,207.50
08/10/19	WMM	Legal services/Client Preparation for oral argument	1.00	795.00
08/11/19	ASH	Analysis of Opposing brief for motion Memorandum of law in opposition to motions to dismiss	.80	608.00
08/11/19	ASH	Analysis of Reply brief for motion SHIP's reply memorandum in support of its motion to dismiss	.60	456.00
08/11/19	EBW	Preparation for Court Beechwood - preparation for oral argument.	4.50	3,442.50
08/11/19	GSL	Preparation for Court (motion) Continued preparing summary of arguments on motions to dismiss - re oral argument	3.50	1,032.50
08/12/19	ASH	Research re Court (motion) Analyze cases cited by SHIP and cases cited by the Receiver in opposition to motion to dismiss	.90	684.00

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

Client/Matter: 22126/0902
Page 112

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/12/19	ASH	Preparation for Court (motion) Summary of arguments made by SHIP and the Receiver's responses	3.80	2,888.00
08/12/19	ASH	Analysis of Memorandum Memo from GSL regarding statute of limitations issue	.20	152.00
08/12/19	EBW	Preparation for Court Beechwood - preparation for oral argument.	4.80	3,672.00
08/12/19	GSL	Preparation for Court (motion) Research - re oral argument on motions to dismiss	1.70	501.50
08/12/19	GSL	Preparation for Court (motion) Research - re oral argument on motions to dismiss	2.70	796.50
08/12/19	WMM	Legal services/Client Communications scheduling discovery meeting on 8/14.	.50	397.50
08/12/19	WMM	Legal services/Legal Papers Finalize memo of responses to BCLIC/WNIC brief in prep for oral argument.	2.00	1,590.00
08/12/19	WMM	Legal services/Legal Papers Review legal research of securities claim.	.90	715.50

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

Client/Matter: 22126/0902
Page 113

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/12/19	WMM	Legal services/Client Conference with counsel for SHIP; PPVA and CNO cocnerning joint opposition to comity motion and communications concerning same.	.60	477.00
08/13/19	EBW	Preparation for Court Beechwood - preparation for oral argument.	7.50	5,737.50
08/13/19	GSL	Preparation for Court (motion) Research on securities - re oral argument on motions to dismiss	2.80	826.00
08/13/19	GSL	Preparation for Court (motion) Prepared documents/notes for EBW - re oral argument	1.10	324.50
08/13/19	JKH	Correspondence Beechwood - Review of email from Vendor with inquiry; preparing response to same	.30	88.50
08/13/19	JKH	Prepare Legal Papers Beechwood - preparing documents for oral argument	.30	88.50
08/14/19	ASH	Telephone Call(s) w/Adversary Brian Siebert regarding deposition notices (2); analyze correspondence regarding same; e-mails with co-counsel regarding same	.30	228.00

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

Client/Matter: 22126/0902
Page 114

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/14/19	EBW	Preparation for Court Beechwood - preparation for oral argument.	9.20	7,038.00
08/14/19	GSL	Analysis of Memorandum Review/analysis of Beechwood Re's Motion for Comity	.60	177.00
08/14/19	GSL	Preparation for Court (motion) Prepared research/notes for EBW - re oral argument on motions to dismiss	3.70	1,091.50
08/14/19	JKH	Prepare Legal Papers Beechwood - preparing documents for oral argument	2.20	649.00
08/14/19	WMM	Legal services/Client Prepare for and attend discovery conference among counsel at offices of Holland & Knight; communicatinos concerning same.	3.50	2,782.50
08/14/19	WMM	Legal services/Legal Papers Attention to notice from court concerning time for oral argument and communications concerning same.	.50	397.50
08/15/19	EBW	Preparation for Court Beechwood - preparation for oral argument.	1.50	1,147.50

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

Client/Matter: 22126/0902
Page 115

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/15/19	EBW	Attend Court Beechwood - attend and argue at oral argument on motions to dismiss.	8.00	6,120.00
08/15/19	GSL	Preparation for Court (motion) Prepared research/notes for EBW - re oral argument on motions to dismiss	.80	236.00
08/15/19	GSL	Research re Reply Research - re objection to Beechwood Re's motion for comity	1.60	472.00
08/15/19	JKH	Document Review Beechwood - doc review	3.10	914.50
08/15/19	JKH	Prepare Legal Papers Beechwood - preparing documents for oral argument	.30	88.50
08/15/19	WMM	Legal services/Client Prepare for and participate in oral argument in court; communications concerning same.	3.50	2,782.50
08/16/19	EBW	Conference(s) In Office Beechwood - conference with potential expert witness.	1.50	1,147.50
08/16/19	EBW	Analysis of Legal Papers Beechwood - analysis of legal issues regarding comity motion.	1.20	918.00

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

Client/Matter: 22126/0902
Page 116

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/16/19	EBW	Analysis of Legal Papers Beechwood - analysis of post-hearing issues.	.60	459.00
08/16/19	GSL	Preparation of Memorandum Prepared outline for objection to Beechwood Re's motion for comity	1.40	413.00
08/16/19	JKH	Diary & Docket Beechwood - review of email with confirmed deposition dates; calendaring same	.20	59.00
08/16/19	JKH	Document Review Beechwood - doc review (D&P docs)	2.30	678.50
08/16/19	JKH	Document Review Beechwood - doc review (SHIP docs)	2.10	619.50
08/16/19	WMM	Legal services/Legal Papers Review letters to court from CNO and SHIP concerning new case used at oral argument.	1.00	795.00
08/18/19	GSL	Preparation of Memorandum Prepared draft objection to motion to comity	4.50	1,327.50
08/19/19	ASH	Telephone Call(s) w/CoCounsel - Other B. Parlin regarding documents from third parties	.20	152.00

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

Client/Matter: 22126/0902
Page 117

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/19/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with Troy Sarpen regarding documents received from Trey Rogers and memo	.40	304.00
08/19/19	ASH	Analysis of Order Analyze order on motion to dismiss	.40	304.00
08/19/19	ASH	Telephone Call(s) w/CoCounsel - Other With MLC and EBW regarding decision on motion to dismiss	.20	152.00
08/19/19	ASH	Analysis of Correspondence Letters from counsel for SHIP and CNO regarding new case cited at oral argument	.20	152.00
08/19/19	EBW	Preparation for Conference Beechwood - preparation for litigation team meeting.	.20	153.00
08/19/19	EBW	Conference(s) In Office Beechwood - litigation team strategy session.	1.00	765.00
08/19/19	EBW	Telephone Call(s) Beechwood - teleconference with B. Parlin regarding items of mutual interest.	.10	76.50
08/19/19	EBW	Preparation of Legal Papers Beechwood - review of opposition to comity motion.	.80	612.00

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

Client/Matter: 22126/0902
Page 118

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/19/19	EBW	Analysis of Legal Papers Beechwood - analysis of short form order; including conferences with A. Halpern and teleconference with receiver.	2.50	1,912.50
08/19/19	GSL	Preparation of Memorandum Continued preparing objection to motion for comity	1.80	531.00
08/19/19	GSL	Preparation of Memorandum Edits/continued preparing objection to motion for comity	4.00	1,180.00
08/19/19	GSL	Conference(s) In Office Team meeting - re depositions	1.00	295.00
08/19/19	GSL	Analysis of Order Re - remaining claims	.90	265.50
08/19/19	GSL	Research re Order Order on MTD	1.00	295.00
08/19/19	JKH	Review/analyze Beechwood - review order re motions to dismiss	.20	59.00
08/19/19	JKH	Document Review Beechwood - doc review	3.70	1,091.50

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

Client/Matter: 22126/0902
Page 119

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/19/19	JKH	Correspondence Beechwood - preparing email summary to group re analysis of doc review	.60	177.00
08/19/19	WMM	Legal services/Legal Papers Analyze bottom line Order on Motions to Dismiss; communications concerning same.	1.00	795.00
08/20/19	ASH	Analysis of Brief for motion SHIP's memorandum of law in support of motion to dismiss	.60	456.00
08/20/19	ASH	Analysis of Legal Papers Meeting with EBW; WMM; GSL and Brent Weisenberg regarding depositions	2.00	1,520.00
08/20/19	ASH	Examine Documents Regarding Beechwood transactions	.90	684.00
08/20/19	ASH	Preparation for Deposition Analyze and assemble documents for depositions	3.80	2,888.00
08/20/19	ASH	Preparation of Legal Papers Review discovery requests regarding additional productions	.30	228.00
08/20/19	EBW	Analysis of Legal Papers Beechwood - continued analysis of short form order on motions to dismiss.	1.20	918.00

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

Client/Matter: 22126/0902
Page 120

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/20/19	EBW	Analysis of Legal Papers Beechwood - final review of opposition to comity motion.	.80	612.00
08/20/19	EBW	Analysis of Legal Papers Beechwood - analysis of other oppositions to comity motion.	.30	229.50
08/20/19	EBW	Preparation for Conference Beechwood - preparation for strategy meeting.	.60	459.00
08/20/19	EBW	Conference(s) In Office Beechwood - strategy meeting with litigation team.	2.20	1,683.00
08/20/19	GSL	Research re Deposition Research - re experts	.50	147.50
08/20/19	GSL	Preparation for Deposition Prepared CoA chart for depositions	2.40	708.00
08/20/19	GSL	Preparation of Memorandum Continued preparing objection to motion for comity	2.10	619.50
08/20/19	GSL	Research re Order Prepared summary of research	.30	88.50

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

Client/Matter: 22126/0902
Page 121

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/20/19	GSL	Conference(s) In Office Beechwood Team Meeting - re order	2.10	619.50
08/20/19	GSL	Conference(s) In Office Arbitration team meeting - re prep for depositions	1.00	295.00
08/20/19	JKH	Conference(s) in Office Beechwood - group meeting to discuss next steps	.40	118.00
08/20/19	JKH	Prepare Legal Papers Beechwood - preparing service and letter to chambers re joint response to comity motion	.20	59.00
08/20/19	WMM	Legal services/Client Review cause of action memo and participate in team conference concerning strategy.	3.00	2,385.00
08/21/19	ASH	Examine Documents to EBW; Brent Weisenberg; Marc Kirschner and GSL regarding issues relating to document productions and depositions (7)	.30	228.00
08/21/19	EBW	Correspondence Beechwood - correspondence with counsel for Beechwood regarding meeting.	.10	76.50
08/21/19	EBW	Analysis of Legal Papers Beechwood - analysis of oppositions to comity motion.	.70	535.50

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

Client/Matter: 22126/0902
Page 122

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/21/19	EBW	Analysis of Legal Papers Beechwood - analysis of dismissal of Lincoln complaint.	.60	459.00
08/21/19	EBW	Preparation for Conference Beechwood - preparation for conference with 30(b)(6) witness.	.40	306.00
08/21/19	EBW	Preparation of Legal Papers Beechwood - revisions to notices and responses.	.70	535.50
08/21/19	GSL	Preparation of Discovery device Prepared notices/subpoenas	6.40	1,888.00
08/21/19	GSL	Preparation of Resp to disc. device Prepared objections to 30(b)(6) Notices to the Receiver	.50	147.50
08/21/19	GSL	Conference(s) In Office Arbitration team meeting - re production of third party productions	.20	59.00
08/21/19	JKH	Document Review Beechwood - reviewing and gathering documents related to certain transactions	2.60	767.00
08/21/19	JKH	Review Documents Beechwood - reviewing documents and making list of possible parties to send notice to; preparing email summary re same	1.40	413.00

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

Client/Matter: 22126/0902
Page 123

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/21/19	JKH	Review/analyze Beechwood - reviewing and profiling multiple notices of deposition	.40	118.00
08/21/19	WMM	Legal services/Legal Papers Review 30(b)(6) Notices and subpoenas to various parties and communications concerning same.	1.00	795.00
08/21/19	WMM	Legal services/Legal Papers Review 30(b)(6) objections and communications concerning same; scheduling and witnesses to depose.	1.00	795.00
08/22/19	EBW	Preparation for Conference Beechwood - preparation for conference with 30(b)(6) witness.	.40	306.00
08/22/19	EBW	Conference(s) In Office Beechwood - conference with G. Leon and 30(b)(6) witness.	.70	535.50
08/22/19	EBW	Correspondence Beechwood - correspondence with adversaries regarding scheduling issues.	.20	153.00
08/22/19	EBW	Preparation of Legal Papers Beechwood - revisions to deposition notices and objections.	.60	459.00

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

Client/Matter: 22126/0902
Page 124

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/22/19	EBW	Preparation for Deposition Beechwood - preparation for depositions.	1.30	994.50
08/22/19	GSL	Correspondence w/Adversary Re - authority to accept service of subpoena	.50	147.50
08/22/19	GSL	Preparation for Deposition 30(b)(6) Witness prep	1.20	354.00
08/22/19	GSL	Preparation of Discovery device Prepared 30(b)(6) notices to Beechwood Defendants	2.30	678.50
08/22/19	GSL	Preparation of Resp to disc. device Prepared objections to document requests to the Receiver	2.80	826.00
08/22/19	JKH	Prepare Legal Papers Beechwood - preparing document binder for M. Kirschner to prepare for deposition	.30	88.50
08/23/19	EBW	Correspondence Beechwood - correspondence with team and adversaries regarding scheduling and depositions.	.70	535.50
08/23/19	EBW	Analysis of Legal Papers Beechwood - analysis of Chapter 15 issues; including debtor's reply brief.	.80	612.00

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

Client/Matter: 22126/0902
Page 125

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/23/19	EBW	Preparation for Deposition Beechwood - preparation for depositions.	1.70	1,300.50
08/23/19	GSL	Research re Order Additional research - re order to dismiss	.80	236.00
08/23/19	JKH	Correspondence Beechwood - email to strategic regarding new production to be added	.20	59.00
08/24/19	ASH	Correspondence w/CoCounsel - Other with B. Parlin regarding whether documents received from the Trusts have been produced	.20	152.00
08/25/19	ASH	Examine Documents Review UCC searches for production	.20	152.00
08/25/19	ASH	Correspondence w/Adversary to all counsel in action producing documents; to all counsel regarding document produced by Beechwood	.30	228.00
08/25/19	ASH	Preparation of e-mail(s) To EBW; Brent Weisenberg; GSL and JKH regarding issues relating to document productions and documents relating to Beechwood transactions	.40	304.00
08/26/19	EBW	Preparation for Deposition Beechwood - preparation for depositions.	.80	612.00

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

Client/Matter: 22126/0902
Page 126

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/26/19	GSL	Preparation of Correspondence Correspondence with counsel - re depositions	.80	236.00
08/26/19	WMM	Legal services/Client Communications concerning deposition scheduling and discovery.	.50	397.50
08/27/19	JKH	Analyze Documents Beechwood - reviewing documents and preparing binders with various assignments and agreements relating to certain transactions	2.80	826.00
08/27/19	WMM	Legal services/Client Communications scheduling depo prep and concerning issues with testimony.	.50	397.50
08/28/19	EBW	Preparation for Conference Beechwood - preparation for conference with Beechwood.	.80	612.00
08/28/19	EBW	Preparation for Deposition Beechwood - preparation for depositions; including review of changes to protocol.	.80	612.00
08/28/19	GSL	Correspondence w/Adversary Correspondence with counsel - re deposiiton protocol	.30	88.50

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

Client/Matter: 22126/0902
Page 127

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/29/19	EBW	Preparation for Conference Beechwood - preparation for conference with counsel for Beechwood.	.90	688.50
08/29/19	EBW	Conference Out of Office Beechwood - conference with Receiver and counsel for Beechwood; along with post-conference discussion with Receiver.	2.50	1,912.50
08/29/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for Beechwood.	.30	229.50
08/29/19	EBW	Correspondence Beechwood - correspondence with various adversaries regarding depositions issues.	.70	535.50
08/29/19	GSL	Correspondence w/Adversary Correspondence with counsel - re deposition protocol	.80	236.00
08/29/19	WMM	Legal services/Client Communications concerning response and review same; communications concerning scheduling depositions.	.70	556.50
08/30/19	ASH	Preparation of e-mail(s) to ASC regarding documents; analyze documents regarding same	.30	228.00

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

Client/Matter: 22126/0902
Page 128

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/30/19	EBW	Correspondence Beechwood - correspondence and teleconferences with counsel for Beechwood and SHIP.	1.60	1,224.00
08/30/19	EBW	Correspondence Beechwood - correspondence with litigation team regarding depositions.	.40	306.00
08/30/19	EBW	Telephone Call(s) Beechwood - teleconference with document vendor regarding status.	.40	306.00
08/30/19	WMM	Legal services/Client Communications concerning scheduling possible mediations and call regarding Protocol and depositions.	.70	556.50
09/03/19	ASH	Conference(s) w/ CoCounsel - Other With EBW; WMM; GSL and Brent Weisenberg regarding depositions	.70	532.00
09/03/19	EBW	Conference(s) In Office Beechwood - litigation team meeting regarding strategy and preparation.	.70	535.50
09/03/19	EBW	Telephone Call(s) Beechwood - teleconference with adversaries regarding depositions.	.60	459.00

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

Client/Matter: 22126/0902
Page 129

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/03/19	EBW	Preparation for Conference Beechwood - preparation for litigation team meeting.	.80	612.00
09/03/19	EBW	Analysis of Legal Papers Beechwood - attention to case strategy and research.	2.60	1,989.00
09/03/19	GSL	Preparation for Conference Prepared agenda for Beechwood Team Meeting - re deposition preparation	.30	88.50
09/03/19	GSL	Analysis of Discovery device Reviewed latest draft of deposition protocol	.40	118.00
09/03/19	GSL	Conference(s) In Office Platinum-Beechwood Team Meeting - re deposition protocol	.70	206.50
09/03/19	GSL	Preparation of Correspondence Prepared draft email to counsel - re deposition protocol	.20	59.00
09/03/19	JKH	Review/analyze Beechwood - preparing document binder of transactions	3.20	944.00
09/03/19	JKH	Diary & Docket Beechwood - Reviewing deposition protocol and calendaring all depositions	.90	265.50

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

Client/Matter: 22126/0902
Page 130

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/03/19	JKH	Review/analyze Beechwood - review of additional document production	.20	59.00
09/03/19	JKH	Telephone Call(s) Beechwood - conference call re deposition scheduling	.70	206.50
09/03/19	WMM	Legal services/Legal Papers Review court decision on SHIP motion to dismiss counterclaims.	.50	397.50
09/03/19	WMM	Legal services/Legal Papers Review updated protocol and deposition schedule and party call concerning same.	1.50	1,192.50
09/03/19	WMM	Legal services/Client Team meeting concerning deposition prep.	.70	556.50
09/03/19	WMM	Review file re Deposition Reviewing amended complaint and briefs for CNO 30(b)(6) deposition prep.	3.50	2,782.50
09/03/19	WMM	Legal services/Client Communications concerning post-receivership privilege issues.	.20	159.00
09/03/19	WMM	Legal services/Legal Papers Review correspondence from counsel for CNO concerning our response and objections to BCLIC/WNIC 30(b)(6) notice.	.80	636.00

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

Client/Matter: 22126/0902
Page 131

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/04/19	EBW	Preparation for Conference Beechwood - preparation for conference with counsel for SHIP.	.40	306.00
09/04/19	EBW	Conference Out of Office Beechwood - conference with counsel for SHIP regarding case.	2.00	1,530.00
09/04/19	EBW	Conference(s) In Office Beechwood - conferences with B. Weisenberg and Receiver regarding conference with SHIP's counsel.	2.00	1,530.00
09/04/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for SHIP regarding status.	.30	229.50
09/04/19	EBW	Telephone Call(s) Beechwood - teleconference with potential expert witness.	.30	229.50
09/04/19	GSL	Analysis/Strategy Prepared summary of parties and counsel	.30	88.50
09/04/19	JKH	Depositions Preparing documents for depositions	2.30	678.50
09/04/19	JKH	Prepare Legal Papers Beechwood - preparing document binder of transactions	1.10	324.50

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

Client/Matter: 22126/0902
Page 132

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/04/19	WMM	Legal services/Legal Papers Receive and review updated protocol and schedule; communications concerning CNO failure to provide deposition dates.	.80	636.00
09/05/19	ASH	Conference(s) w/ Client Meet with EBW; WMM; Brent Weisenberg and potential 30(b)(6) witness to prepare for 30(b)(6) witness for the Receiver	1.80	1,368.00
09/05/19	EBW	Preparation for Conference Beechwood - preparation for conference with 30(b)(6) witness.	1.40	1,071.00
09/05/19	EBW	Conference(s) In Office Beechwood - conference with 30(b)(6) witness. (EBW portion).	2.20	1,683.00
09/05/19	EBW	Analysis of Legal Papers Beechwood - review indemnification ruling.	.40	306.00
09/05/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for SHIP and CNO regarding status.	1.00	765.00
09/05/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for Beechwood regarding status.	.20	153.00

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

Client/Matter: 22126/0902
Page 133

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/05/19	JKH	Pacer-Docket Check Beechwood - check status and provide brief summary re AGH case in DE	.20	59.00
09/05/19	WMM	Legal services/Client Team meeting concerning preparation of 30(b)(6) witness for deposition.	1.50	1,192.50
09/05/19	WMM	Legal services/Legal Papers Receive and review changes to protocol and schedule; communications concerning CNO's response; reviewing subpoenas from Holland & Knight.	1.20	954.00
09/06/19	EBW	Conference(s) In Office Beechwood - conference with Goldin and B. Weisenberg regarding strategy.	1.00	765.00
09/06/19	EBW	Conference(s) In Office Beechwood - conference with expert witness and B. Weisenberg regarding strategy.	1.50	1,147.50
09/06/19	EBW	Review Documents Beechwood - analysis of various productions and responses by parties.	2.10	1,606.50
09/06/19	EBW	Telephone Call(s) Beechwood - teleconferences with counsel for PPVA regarding privilege issues.	.40	306.00

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

Client/Matter: 22126/0902
Page 134

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/06/19	JKH	Pacer-Docket Check Beechwood - reviewing AGH related case docket and preparing email summary of filings	.70	206.50
09/06/19	WMM	Review file re Deposition Reviewing Amended Complaint; briefs and documents in preparation for Wegner deposition.	4.50	3,577.50
09/06/19	WMM	Legal services/Client Team meeting with Expert concerning expert testimony and communications concerning same.	1.50	1,192.50
09/06/19	WMM	Legal services/Legal Papers Review correspondence from H&K concerning production and protective order; and communications concerning same.	.50	397.50
09/08/19	ASH	Preparation for Deposition Review and assemble documents to be used to prepare 30(b)(6) deponent for his deposition	5.90	4,484.00
09/09/19	ASH	Preparation for Deposition Assemble documents for use in preparing 30(b)(6) deponent for deposition	3.10	2,356.00
09/09/19	ASH	Telephone Call(s) w/CoCounsel - Other With Brent Weisenberg regarding preparation for 30(b)(6) deposition	.20	152.00

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

Client/Matter: 22126/0902
Page 135

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/09/19	EBW	Telephone Call(s) Beechwood - teleconference and correspondence with counsel for Beechwood.	.20	153.00
09/09/19	EBW	Correspondence Beechwood - analysis of correspondence from counsel for CNO.	.30	229.50
09/09/19	EBW	Preparation for Conference Beechwood - preparation for case conference.	1.50	1,147.50
09/09/19	JKH	Review/analyze Beechwood - reviewing and circulating documents in preparation for Wegner deposition	.70	206.50
09/09/19	WMM	Legal services/Deposition Analyzing documents in preparation for Wegner deposition; communications concerning same.	5.00	3,975.00
09/10/19	CMO	Analysis of Correspondence Re: upcoming Beechwood depositions	.20	59.00
09/10/19	ASH	Examine Documents Review documents for use in preparing 30(b)(6) witness for his deposition	.50	380.00

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

Client/Matter: 22126/0902
Page 136

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/10/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for Beechwood.	.50	382.50
09/10/19	ACS	Conference(s) w/ CoCounsel - Other Meet with EBW re Beechwood settlement status and strategy	.50	432.50
09/10/19	JKH	Depositions Beechwood - review and gather documents for Wegner and Receiver 30(b) (6) depositions	2.70	796.50
09/10/19	JKH	Review/analyze Beechwood - Reviewing and organizing multiple production and interrogatory requests and responses	1.10	324.50
09/10/19	WMM	Legal services/Deposition Communications concerning documents for Wegner deposition and continue preparations for same.	6.70	5,326.50
09/11/19	ASH	Analysis of Correspondence From Elizabeth Buckel regarding 30(b) (6) notices to the Receiver and to the CNO Defendants	.30	228.00
09/11/19	EBW	Preparation for Conference Beechwood - preparation for case conference with adversaries.	.40	306.00

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

Client/Matter: 22126/0902
Page 137

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/11/19	EBW	Telephone Call(s) Beechwood - teleconference with counsel for Lincoln.	.10	76.50
09/11/19	WMM	Legal services/Deposition Continue preparation for Wegner deposition.	4.50	3,577.50
09/12/19	JSF	Telephone Call(s) EBW and Brent Weisenberg re: Settlement Discussions	.20	161.00
09/12/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with B. Parlin and Sheila Shen regarding electronic discovery issue; e-mails with EBW and Brent Weisenberg regarding same; telephone call with EBW regarding same	.20	152.00
09/12/19	ASH	Examine Documents regarding prior electronic document productions	.30	228.00
09/12/19	EBW	Conference Out of Office Beechwood - conference with counsel for SHIP; CNO and Beechwood; as well as pre- and post-conference meetings with B. Weisenberg; T. Rogers and A. Chakabva.	9.50	7,267.50
09/12/19	JKH	Depositions Beechwood - preparing documents for depositions	2.40	708.00

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

Client/Matter: 22126/0902
Page 138

December 23, 2019
BILL NO. 206900

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/12/19 WMM	Legal services/Deposition Prepare for Wegner deposition.	2.70	2,146.50
09/12/19 WMM	Legal services/Client Communications concerning settlement discussions.	.50	397.50
09/13/19 ASH	Examine Documents Documents for use in preparation of 30(b)(6) witness; run searches regarding same; numerous e-mails with JKH and GLS regarding same	1.50	1,140.00
09/13/19 ASH	Correspondence w/Adversary To Elizabeth Buckel regarding meet and confer; e-mails with EBW regarding same	.30	228.00
09/13/19 ASH	Correspondence w/Client to Trey Rogers regarding documents for use in 30(b)(6) deposition preparation	.20	152.00
09/13/19 EBW	Analysis of Legal Papers Beechwood - attention to deposition issues.	.60	459.00
09/13/19 EBW	Telephone Call(s) Beechwood - teleconferences with B. Weisenberg; S. Silverstein and W. Moran regarding status and strategy.	.90	688.50

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

Client/Matter: 22126/0902
Page 139

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/13/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon K Burn re update on Beechwood settlement negotiations	.10	86.50
09/13/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon EBW re Beechwood settlement status and strategy	.60	519.00
09/13/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon B Weisenberg re Beechwood	.30	259.50
09/13/19	JKH	Prepare Legal Papers Beechwood - additional preparation for depositions	1.30	383.50
09/13/19	JKH	Document Review Beechwood - review and prepare documents for Wegner deposition	2.40	708.00
09/13/19	JKH	Review Documents Beechwood - review and prepare documents for 30(b)(6) deposition	1.70	501.50
09/13/19	JKH	Analyze Documents Beechwood - review 30(b)(6) notice from SHIP	.20	59.00
09/13/19	JKH	Analyze Documents Beechwood - review additional depo notices	.30	88.50

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

Client/Matter: 22126/0902
Page 140

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/13/19	WMM	Legal services/Deposition Continue preparation for Wegner deposition and communications concerning same.	6.30	5,008.50
09/13/19	WMM	Legal services/Client Communications concerning case status	.50	397.50
09/13/19	WMM	Legal services/Legal Papers Receive and review SHIP notice of 30(b)(6) deposition of Receiver and topics; communications concerning same.	.70	556.50
09/14/19	ASH	Analysis of Notice of Deposition SHIP's 30(b)(6) notice	.20	152.00
09/14/19	ASH	Analysis of Court Decision Judge Rakoff's decision regarding indemnification from SHIP	.30	228.00
09/15/19	JKH	Analyze Documents Beechwood - prepare and search for documents in preparation for Wegner deposition	2.60	767.00
09/15/19	WMM	Legal services/Deposition Preparing for deposition of Wegner.	2.50	1,987.50
09/16/19	CMO	Preparation of e-mail(s) To Court Reporter re: confirming attendance at Brian Wegner deposition	.20	59.00

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

Client/Matter: 22126/0902
Page 141

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/16/19	ASH	Review/correct Resp-ntc of disc-insp. Objections to notice of deposition served by SHIP	.70	532.00
09/16/19	ASH	Preparation for Deposition Binder for potential 30(b)(6) witness	2.40	1,824.00
09/16/19	ASH	Analysis of Notice of Deposition Analyze notices of 30(b)(6) depositions served by numerous parties	.80	608.00
09/16/19	ASH	Preparation of Legal Papers Prepare summary of arguments regarding 30(b)(6) notices to and from the CNO defendants	1.20	912.00
09/16/19	ASH	Preparation of e-mail(s) To EBW; WMM and Elizabeth Buckel regarding "meet and confer" regarding 30(b)(6) notices (8)	.50	380.00
09/16/19	EBW	Telephone Call(s) Beechwood - Multiple conference calls with B. Weisenberg and litigation team regarding strategy.	1.60	1,224.00
09/16/19	EBW	Correspondence Beechwood - correspondence with litigation team regarding deposition preparation.	.90	688.50

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

Client/Matter: 22126/0902
Page 142

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/16/19	EBW	Correspondence Beechwood - analysis of correspondence and filings/service by various parties.	.80	612.00
09/16/19	ACS	Conference(s) w/ CoCounsel - Other Meet with B Weisenberg and WMM re preparation for meeting with Receiver	.50	432.50
09/16/19	ACS	Conference(s) w/ Client Meet with Receiver; B Weisenberg; W Edwards; WMM and telecon EBW re case status discussions with Beechwood et al	.80	692.00
09/16/19	GSL	Preparation of Resp to disc. device Prepared Objections to SHIP's 30(b)(6) Notice to the Receiver	3.00	885.00
09/16/19	GSL	Review/correct Resp to disc. device Re Objections to SHIP's 30(b)(6) Notice	1.80	531.00
09/16/19	GSL	Analysis of Notice of Deposition Reviewed all notices to the Receiver and Deposition Protocol	1.20	354.00
09/16/19	GSL	Analysis of Legal Papers Prepared summary of PPVA status report for EBW	.30	88.50
09/16/19	JKH	Document Review Beechwood - reviewing documents for Wegner deposition	2.50	737.50

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

Client/Matter: 22126/0902
Page 143

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/16/19	JKH	Correspondence Beechwood - email communications re Wegner deposition attendance	.10	29.50
09/16/19	JKH	Review/analyze Beechwood - review of deposition protocol re deadline for deposition notices; researching rules re objections	.70	206.50
09/16/19	JKH	Correspondence Beechwood - review of emails regarding wegner depo time and place; updating calendar	.20	59.00
09/16/19	JKH	Correspondence Beechwood - multiple email communications with vendors re document productions	.40	118.00
09/16/19	WMM	Legal services/Client Prepare for and participate in team conference concerning case status.	.60	477.00
09/16/19	WMM	Legal services/Deposition Continue analyzing documents for Wegner deposition; communications concerning same.	6.70	5,326.50
09/17/19	ASH	Telephone Call(s) w/CoCounsel - Other With Adam Kaiser and WMM regarding 30 (b) (6) depositions	.40	304.00

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

Client/Matter: 22126/0902
Page 144

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/17/19	ASH	Analysis of Legal Papers In preparation for conference call with counsel for the CNO Defendants	.60	456.00
09/17/19	ASH	Correspondence w/Adversary to all counsel requesting meeting regarding procedures for 30(b)(6) notices	.40	304.00
09/17/19	ASH	Analysis of Correspondence Recent correspondence from numerous opposing counsel in case	.20	152.00
09/17/19	EBW	Telephone Call(s) Beechwood - Teleconferences with B. Weisenberg and W. Moran regarding depositions and strategy.	2.50	1,912.50
09/17/19	EBW	Correspondence Beechwood - attention to emails regarding depositions and strategy.	.60	459.00
09/17/19	JKH	Correspondence Beechwood - communications with court reporter re Wegner deposition	.20	59.00
09/17/19	JKH	Preparation for Deposition Beechwood - prepare documents for Wegner deposition	3.60	1,062.00

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

Client/Matter: 22126/0902
Page 145

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/17/19	JKH	Preparation for Deposition Beechwood - doc review for Wegner deposition	.70	206.50
09/17/19	WMM	Legal services/Client Prepare for and participate in meet and confer with CNO concerning deposition topics.	1.70	1,351.50
09/17/19	WMM	Legal services/Deposition Communications concerning subpoena to Wegner for arbitration and settlement documents for same; reviewing same; preparation for deposition tomorrow.	7.50	5,962.50
09/18/19	JSF	Examine Documents Status of case with MLC and B. Weisenberg	.30	241.50
09/18/19	ASH	Correspondence w/CoCounsel - Other With 30(b)(6) regarding documents for deposition preparation; with Brent Weisenberg and EBW regarding deposition preparation	.20	152.00
09/18/19	EBW	Telephone Call(s) Beechwood - multiple strategy calls with B. Weisenberg.	.90	688.50
09/18/19	EBW	Correspondence Beechwood - correspondence with litigation team regarding depositions and strategy.	.90	688.50

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

Client/Matter: 22126/0902
Page 146

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/18/19	GSL	Attendance at Deposition Attendance at Wegner Deposition	8.50	2,507.50
09/18/19	JKH	Review/analyze Beechwood - reviewing all recently received document productions and updating production chart	.80	236.00
09/18/19	WMM	Legal services/Deposition Taking the deposition of Wegner.	11.10	8,824.50
09/19/19	ASH	Preparation for Deposition With 30(b)(6); WMM and Brent Weisenberg to prepare for 30(b)(6) deposition	2.40	1,824.00
09/19/19	ASH	Preparation for Deposition Analyze and assemble documents for possible use in 30(b)(6) deposition preparation	1.10	836.00
09/19/19	ASH	Telephone Call(s) w/CoCounsel - Other B. Parlin regarding documents	.30	228.00
09/19/19	ASH	Preparation of e-mail(s) Emails to EBW and Brent Weisenberg regarding conversations with B. Parlin regarding documents	.20	152.00
09/19/19	EBW	Review Documents Beechwood - attention to document production issues.	.40	306.00

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

Client/Matter: 22126/0902
Page 147

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/19/19	EBW	Analysis of Legal Papers Beechwood - attention to depositions issues.	.40	306.00
09/19/19	JKH	Review Documents Beechwood - review and gather documents to prepare for PPCO 30(b)(6) deposition	.40	118.00
09/19/19	JKH	Research Beechwood - review of emails re supplemental production	.60	177.00
09/19/19	WMM	Legal services/Deposition Numerous communications concerning Wegner deposition and strategy for deposing Lorenz and SHIP; review letter from counsel concerning documents to be produced from SHIP; communications concerning deposition dates for CNO.	1.00	795.00
09/19/19	WMM	Legal services/Deposition Prepare for and participate in team conference to prepare for 30(b)(6) deposition.	2.70	2,146.50
09/20/19	ASH	Preparation of e-mail(s) To EBW; WMM; Brent Weisenberg and GSL regarding meeting with 30(B)(6) deposition regarding deposition preparation and future related tasks	.60	456.00

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

Client/Matter: 22126/0902
Page 148

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/20/19	EBW	Correspondence Beechwood - correspondence with litigation team regarding production and deposition issues.	.40	306.00
09/20/19	JKH	Prepare Legal Papers Beechwood - prepare for 30(b)(6) deposition	1.40	413.00
09/20/19	WMM	Legal services/Legal Papers Review document production from Bodner; communications concerning prep of 30(b)(6) witness.	1.80	1,431.00
09/22/19	ASH	Memorandum to CoCounsel - Other to Receiver; EBW; Receiver; Brent Weisenberg; EBW ; WMM and GSL regarding considerations and future legal and factual research regarding settlement; analyze background documents relating to same	1.10	836.00
09/23/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with Brent Weisenberg; Trey Rogers and GSL regarding legal research issues	.90	684.00
09/23/19	ASH	Preparation of e-mail(s) to all counsel regarding deposition scheduling	.10	76.00

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

Client/Matter: 22126/0902
Page 149

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/23/19	ASH	Research re Legal Papers Review caselaw regarding issues relating to claims	.50	380.00
09/23/19	ASH	Analysis of Correspondence Correspondence from numerous parties regarding depositions and scheduling	.20	152.00
09/23/19	ASH	Examine Documents Important documents produced by opposing parties	.50	380.00
09/23/19	EBW	Preparation for Deposition Beechwood - preparation for depositions.	2.80	2,142.00
09/23/19	EBW	Analysis of Legal Papers Beechwood - attention to expert witness matters and case strategy.	2.40	1,836.00
09/23/19	GSL	Preparation of Resp-ntc of disc-insp. Prepared Objections to PBIH 30(b)(6) Notice	.70	206.50
09/23/19	GSL	Preparation for Deposition Document review	2.70	796.50
09/23/19	GSL	Analysis/Strategy Research - re applicable statutes	1.00	295.00

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

Client/Matter: 22126/0902
Page 150

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/23/19	GSL	Analysis of Resp to disc. device Review of SHIP 30(b)(6) Objections	.40	118.00
09/23/19	JKH	Analyze Documents Beechwood - review Wegner transcript	.80	236.00
09/23/19	JKH	Document Review Beechwood - document review for Kim deposition	2.20	649.00
09/23/19	WMM	Legal services/Legal Papers Receive and review email of analysis from 30(b)(6) witness and communications concerning same.	.50	397.50
09/23/19	WMM	Legal services/Legal Papers Review draft objections to PBIHL 30(b)(6) Notice and communications concerning same.	.50	397.50
09/23/19	WMM	Legal services/Client Communications concerning settlement status and SHIP dismissal against Feit; communications concerning documents to use against Feit in deposition of same.	.80	636.00
09/23/19	WMM	Legal services/Deposition Communications concerning deposition of SHIP's first 30(b)(6) witness; Barry Staldine; and preparing for same.	3.00	2,385.00

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

Client/Matter: 22126/0902
Page 151

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/23/19	WMM	Legal services/Legal Papers Receive and review SHIP responses to Steinberg discovery requests.	.70	556.50
09/24/19	ASH	Examine Documents Meet with 30(b)(6) witness; Trey Rogers; EBW and Brent Weisenberg regarding deposition preparation	2.10	1,596.00
09/24/19	ASH	Research re Legal Papers Legal research regarding claims; meetings with GSL regarding same	1.80	1,368.00
09/24/19	ASH	Analysis of Legal Papers Preparation for SHIP deposition with WMM	.40	304.00
09/24/19	ASH	Preparation of e-mail(s) Emails to all counsel regarding depositions	.20	152.00
09/24/19	EBW	Preparation for Deposition Beechwood - preparation for Rule 30(b)(6) deposition with W. Moran; A. Halpern; B. Weisenberg; T. Rogers and Goldin.	2.00	1,530.00
09/24/19	EBW	Analysis of Legal Papers Beechwood - analysis of pending deposition and strategy issues.	2.80	2,142.00
09/24/19	GSL	Preparation of Memorandum Continued summary of consolidated actions	1.20	354.00

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

Client/Matter: 22126/0902
Page 152

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/24/19	GSL	Analysis/Strategy Continued research - re applicable statutes	4.40	1,298.00
09/24/19	GSL	Preparation of Notice of Deposition Deposition notices	1.20	354.00
09/24/19	GSL	Document Review Document review - re depo prep	.70	206.50
09/24/19	JKH	Document Review Beechwood - review and prepare documents for Stewart Kim Deposition	2.80	826.00
09/24/19	JKH	Analyze Documents Beechwood - receiving and reviewing Trott depo transcript and exhibits	.20	59.00
09/24/19	WMM	Legal services/Deposition Preparing for Staldine deposition and communications concerning same.	4.50	3,577.50
09/24/19	WMM	Legal services/Deposition Prepare for and participate in team conference to prepare for 30(b)(6) deposition.	2.50	1,987.50
09/25/19	ASH	Correspondence w/CoCounsel - Other to Brent Weisenberg and EBW regarding legal research issues regarding claims	.40	304.00

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

Client/Matter: 22126/0902
Page 153

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/25/19	ASH	Examine Documents Background documents relating to expert report	.30	228.00
09/25/19	EBW	Preparation for Deposition Beechwood - preparation for depositions.	3.40	2,601.00
09/25/19	EBW	Review Documents Beechwood - attention to legal research and strategy.	2.30	1,759.50
09/25/19	GSL	Analysis/Strategy Continued research - re applicable statutes	3.70	1,091.50
09/25/19	GSL	Analysis/Strategy Prepared memo summarizing research - re applicable statutes	3.20	944.00
09/25/19	GSL	Document Review Continued document review - re depo prep	.50	147.50
09/25/19	GSL	Analysis/Strategy Research - re causes of action in FAC	2.10	619.50
09/25/19	JKH	Document Review Beechwood - prepare and organize documents for Kim Deposition and prepare brief email summary re same	1.60	472.00

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

Client/Matter: 22126/0902
Page 154

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/25/19	JKH	Prepare Legal Papers Beechwood - prepare index and document binder of exhibits for Kim deposition	1.90	560.50
09/25/19	JKH	Analyze Documents Analyzing various documents re CNO Proof of Claim	.80	236.00
09/25/19	JKH	Document Review Beechwood - review additional documents for Kim deposition	.60	177.00
09/25/19	WMM	Legal services/Deposition Preparation for Staldine deposition.	7.50	5,962.50
09/25/19	WMM	Legal services/Legal Papers Review legal research concerning rescission issues and communications concerning same.	.50	397.50
09/26/19	ASH	Preparation for Deposition Deposition of Stewart Kim with GSL	.30	228.00
09/26/19	ASH	Research re Legal Papers Various claims in complaint	.40	304.00
09/26/19	ASH	Review/correct Legal Papers Revise expert disclosure	.20	152.00

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

Client/Matter: 22126/0902
Page 155

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/26/19	ASH	Analysis of Correspondence Extensive correspondence from numerous parties regarding depositions; document discovery and court conference	.20	152.00
09/26/19	EBW	Preparation for Deposition Beechwood - preparation for Kim deposition.	4.20	3,213.00
09/26/19	EBW	Preparation of Legal Papers Beechwood - preparation of expert disclosure.	.40	306.00
09/26/19	GSL	Expert Discovery Preparation of intial expert disclosure	1.30	383.50
09/26/19	GSL	Document Review Continued document review - re depo prep	4.80	1,416.00
09/26/19	GSL	Preparation for Deposition Preparation of outline	3.70	1,091.50
09/26/19	JKH	Review Documents Beechwood - reviewing transcripts and exhibits from depositions; saving and profiling same	.40	118.00
09/26/19	JKH	Preparation for Deposition Beechwood - preparing index of exhibits for Kim deposition	.90	265.50

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

Client/Matter: 22126/0902
Page 156

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/26/19	JKH	Preparation for Deposition Beechwood - editing index of Kim deposition exhibits incorporating numerous additional exhibits	1.30	383.50
09/26/19	JKH	Preparation for Deposition Beechwood - preparing documents for Kim deposition	2.40	708.00
09/26/19	JKH	Preparation for Deposition Beechwood - preparing documents for SHIP 30(b)(6) Staldine deposition	.70	206.50
09/26/19	JKH	Review Documents Beechwood - review of additional documents related to Kim deposition	.80	236.00
09/26/19	WMM	Legal services/Legal Papers Reviewing draft Notice of Expert Disclosure and communications concerning same.	.50	397.50
09/26/19	WMM	Legal services/Client Participate in call to court concerning CNO deposition dates and communications concerning same.	.50	397.50
09/26/19	WMM	Legal services/Deposition Communications with counsel concerning Staldine deposition; continue preparing for same.	7.50	5,962.50

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

Client/Matter: 22126/0902
Page 157

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/27/19	CMO	Analysis of Resp to disc. device W/JKH re: availabilty of images in database	.10	29.50
09/27/19	ASH	Telephone Call(s) w/CoCounsel - Other Conference call with Judge Rakoff and opposing counsel regarding scheduling of deposition of the CNO Defendants; prepare for same	.70	532.00
09/27/19	ASH	Preparation of e-mail(s) Email to WMM; EBW; GSL and Brent Weisenberg regarding deposition of the CNO Defendants and results of conference call	.30	228.00
09/27/19	ASH	Telephone Call(s) w/CoCounsel - Other With Rick Bixter regarding conference call with court; with Gabe Hertzberg regarding conference call with court	.20	152.00
09/27/19	ASH	Analysis of Answer Answer filed by the CNO Defendants	.30	228.00
09/27/19	ASH	Analysis of Correspondence From Goldin regarding issues relating to claims and enclosure regarding same	.20	152.00
09/27/19	ASH	Analysis of Notice of Deposition Analyze 30(b)(6) Notice to the CNO Defendants for possible negotiations and/or proposed revisions	.30	228.00

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

Client/Matter: 22126/0902
Page 158

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/27/19	EBW	Attend. at Exam B/T Beechwood - attend and take deposition of Stewart Kim.	9.50	7,267.50
09/27/19	GSL	Attendance at Deposition Attend and assist with Kim and Staldine deposition	9.00	2,655.00
09/27/19	JKH	Review Documents Beechwood - review of documents re PB Investments	.40	118.00
09/27/19	JKH	Correspondence Beechwood - email communications with Vendor and Strategic and review of relativity re production images	1.10	324.50
09/27/19	JKH	Review Documents Beechwood - downloading; reviewing and organizing additional transcripts and exhibits	1.20	354.00
09/27/19	WMM	Legal services/Deposition Taking deposition of SHIP 30(b) (6) witness Barry Staldine; various conferences and communications concerning same.	4.50	3,577.50
09/27/19	WMM	Legal services/Client Communications concerning court conference and ruling concerning CNO deposition dates.	.50	397.50

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

Client/Matter: 22126/0902
Page 159

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/30/19	ASH	Research re Legal Papers Legal research regarding relevant statutes	.50	380.00
09/30/19	ASH	Review/correct Ntc of disc and insp. Discovery requests to the PBIH	.70	532.00
09/30/19	ASH	Review/correct Legal Papers Receiver's expert disclosures	.20	152.00
09/30/19	ASH	Analysis of Legal Papers Analyze background documents for use in document requests to PBIH	.60	456.00
09/30/19	GSL	Analysis/Strategy Continued research - re causes of action in FAC	3.60	1,062.00
09/30/19	GSL	Analysis/Strategy Research - re standing	1.90	560.50
09/30/19	GSL	Expert Discovery Preparation and service of initial expert disclosure	.60	177.00
09/30/19	GSL	Preparation of Discovery device Preparation of RFP to PBIH	2.50	737.50
09/30/19	GSL	Preparation of Discovery device Preparation of RFP to Wilmington Trust	1.10	324.50

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

Client/Matter: 22126/0902
Page 160

December 23, 2019
BILL NO. 206900

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
TOTAL PHASE P14		853.30	\$520,697.00

Phase: P15	ARBITRATION
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/19 ASH	Preparation of Opposing brief for motion Memorandum of Law in Opposition to Motion for Summary Judgment filed by respondents	.70	532.00
07/01/19 ASH	Preparation of Discovery device Prepare response to respondents' request for information regarding damages	3.10	2,356.00
07/01/19 ASH	Conference(s) w/ CoCounsel - Other Meet with ACS regarding response to respondents' request for information regarding damages and dispositive motion served by respondents	.60	456.00
07/01/19 ASH	Telephone Call(s) w/CoCounsel - Other Conference call with ACS and valuation/forensic expert regarding response to dispositive motion	1.20	912.00
07/01/19 ASH	Analysis of Legal Papers Analyze documents regarding response to respondents' 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 161

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/01/19	ACS	Preparation of Opposing brief for motion Review ADVs of other hedge funds and scholarly articles on hedge fund governance to respond to dispositive motion	1.50	1,297.50
07/01/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and telecon valuation/forensic expert re response to dispositive motion	1.20	1,038.00
07/01/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH re responding to damages and dispositve motion	.60	519.00
07/01/19	ACS	Conference(s) w/ CoCounsel - Other E-mail to auditing expert re dispositve motion	.10	86.50
07/01/19	ACS	Research re Opposing brief for motion Research re investment fund governance vs. corporate governance	1.20	1,038.00
07/01/19	GSL	Analysis/Strategy Continued summarizing cases cited in CZ motion for SJ	3.70	1,091.50
07/01/19	JKH	Analyze Documents Reviewing statement of Undisputed Facts and retrieving cited documents	4.70	1,386.50

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

Client/Matter: 22126/0902
Page 162

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/19	ASH	Preparation of Discovery device Prepare response to opposing counsel's request for information regarding damages	2.60	1,976.00
07/02/19	ASH	Examine Documents Analyze documents regarding damages	2.30	1,748.00
07/02/19	ASH	Preparation of Discovery device Prepare summary of Beechwood transactions for response to respondents' request for information regarding damages	1.10	836.00
07/02/19	ASH	Telephone Call(s) w/CoCounsel - Other Conference call with Trey Rogers and Alois Chakabva regarding response to respondents' request for information regarding damages	.90	684.00
07/02/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon T Rogers and A Chakabva re response to damages questionnaire	.90	778.50
07/02/19	ACS	Research re Opposing brief for motion Response to the dispositive motion	.20	173.00
07/02/19	ACS	Preparation of Opposing brief for motion Review work papers and audit standards from expert for response to dispositive motion	.50	432.50

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

Client/Matter: 22126/0902
Page 163

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/19	ACS	Correspondence w/Adversary E-mail from J Bernard	.10	86.50
07/02/19	ACS	Analysis of Legal Papers Research Re: mutual and hedge funds and corporations to respond to motion	1.80	1,557.00
07/02/19	ACS	Conference(s) w/ CoCounsel - Other Meetings with GSL re research for dispositive motion	1.20	1,038.00
07/02/19	ACS	Review/correct Resp to disc. device Edit response to auditor's damages questions	1.10	951.50
07/02/19	GSL	Analysis/Strategy Continued summarizing cases in motion for SJ	.80	236.00
07/02/19	GSL	Analysis/Strategy Research - re motion for SJ	3.90	1,150.50
07/02/19	JKH	Prepare Legal Papers Preparing list and electronic copy of documents in statement of undisputed facts	.40	118.00
07/03/19	ASH	Conference(s) w/ CoCounsel - Other with ACS and GSL regarding tasks for responding to respondents' motion for summary judgment and preparing for depositions	1.00	760.00

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

Client/Matter: 22126/0902
Page 164

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/03/19	ASH	Correspondence w/CoCounsel - Other with counsel for liquidator of PPVA regarding criminal transcripts and exhibits in criminal case (3)	.30	228.00
07/03/19	ASH	Examine Documents Analyze documents regarding motion for summary judgment filed by respondent	2.50	1,900.00
07/03/19	ASH	Preparation of e-mail(s) to other Otterbourg personnel regarding transcripts and exhibits from criminal trial	.20	152.00
07/03/19	EBW	Telephone Call(s) Arbitration - teleconference and correspondence with A. Halpern about related criminal trial issues.	.20	153.00
07/03/19	ACS	Preparation of Opposing brief for motion Review analysis of audit expert	.30	259.50
07/03/19	ACS	Correspondence w/CoCounsel - Other E-mail to audit expert re deposition scheduling	.20	173.00
07/03/19	ACS	Review/correct Resp to disc. device Edit response to damages questionnaire	3.30	2,854.50

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

Client/Matter: 22126/0902
Page 165

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/03/19	ACS	Conference(s) w/ CoCounsel - Other Meet with GSL and ASH re tasks for responding to dispositive motion and preparing for depositions	1.00	865.00
07/03/19	ACS	Correspondence w/Adversary E-mail from/to J. Bernard	.20	173.00
07/03/19	GSL	Analysis/Strategy Continued research - re motion for SJ	2.00	590.00
07/03/19	GSL	Conference(s) In Office Meeting with ACS and ASH - re motion for SJ	1.00	295.00
07/04/19	ASH	Examine Documents Analyze document regarding motion for summary judgment	2.80	2,128.00
07/04/19	ACS	Preparation of Opposing brief for motion Re-review articles re distinction between investment funds and corporations	1.30	1,124.50
07/04/19	ACS	Research re Opposing brief for motion Review caselaw cited by Respondents	1.70	1,470.50
07/04/19	ACS	Preparation of Opposing brief for motion Begin drafting memo of law and affidavit in opposition to dispositive motion	1.10	951.50

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

Client/Matter: 22126/0902
Page 166

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/05/19	ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motion for summary judgment	2.60	1,976.00
07/05/19	ASH	Examine Documents Analyze documents relating to respondents' motion for summary judgment	1.30	988.00
07/05/19	ASH	Research re Opposing brief for motion Memorandum of law in opposition to motion for summary judgment	.90	684.00
07/05/19	ACS	Research re Opposing brief for motion Review in pari delicto cases cited by respondents in dispositive motion	2.50	2,162.50
07/06/19	ASH	Research re Opposing brief for motion Legal research regarding opposition to respondents' motion for summary judgment	1.20	912.00
07/06/19	ASH	Review/correct Correspondence Analyze and revise ACS' draft of response regarding damages	.80	608.00
07/06/19	ASH	Preparation of Opposing brief for motion Memorandum of law in opposition to respondents' motion for summary judgment	1.20	912.00
07/06/19	ACS	Research re Opposing brief for motion Review cases re defense	1.30	1,124.50

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

Client/Matter: 22126/0902
Page 167

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/06/19	GSL	Analysis/Strategy Continued research - re motion for SJ	1.00	295.00
07/07/19	ASH	Analysis of Trial transcript Transcript of closing arguments in criminal trial re: Black Elk	1.90	1,444.00
07/07/19	ASH	Review/correct Discovery device Response to request for information regarding damages	.90	684.00
07/07/19	ASH	Analysis of Correspondence from ACS; Trey Rogers and Alois Chakabva regarding issues; comments and corrections regarding response to request for information regarding damages	.30	228.00
07/07/19	ACS	Review/correct Resp to disc. device Edit A Chakabva revisions to response to damages questions	1.40	1,211.00
07/07/19	GSL	Analysis/Strategy Research - re motion for SJ	2.50	737.50
07/08/19	ASH	Telephone Call(s) w/CoCounsel - Other Conference call with ACS and damages expert regarding response to damages question	.80	608.00

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

Client/Matter: 22126/0902
Page 168

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/08/19	ASH	Analysis of Memorandum Review research memo from GSL and cases and other authorities regarding independence issue; memo from GSL regarding analysis of citations	.60	456.00
07/08/19	ASH	Correspondence w/CoCounsel - Other With Kevin Melfi and Christopher Sharp of Strategic regarding document productions (6)	.40	304.00
07/08/19	ASH	Correspondence w/CoCounsel - Other to Trey Rogers regarding Black Elk documents	.20	152.00
07/08/19	ASH	Examine Documents Assemble and analyze additional documents regarding respondents' motion for summary judgment; e-mails to ACS regarding same; analyze documents regarding "Black Elk" on Relativity	1.80	1,368.00
07/08/19	ASH	Research re Legal Papers case regarding in pari delicto	.30	228.00
07/08/19	ASH	Analysis of Correspondence From Trey Rogers; Alois Chakabva and ACS regarding response re respondents' request for additional information regarding damages	.30	228.00

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

Client/Matter: 22126/0902
Page 169

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/08/19	ASH	Review/correct Discovery device edit response regarding damages	.50	380.00
07/08/19	ASH	Analysis of Correspondence Extensive correspondence from respondents' counsel and auditors regarding scheduling and related issues	.20	152.00
07/08/19	ACS	Review/correct Resp to disc. device Further edit response to damages questions in arbitration	2.30	1,989.50
07/08/19	ACS	Research re Opposing brief for motion Review GSL research re violations of auditor independence rules based on auditor releases	.40	346.00
07/08/19	ACS	Correspondence w/CoCounsel - Other E-mails from/to auditing experts re deposition schedule	.20	173.00
07/08/19	ACS	Preparation of Opposing brief for motion Review summaries of Manela criminal testimony for response to arbitration dispositive motion	.30	259.50
07/08/19	ACS	Preparation of Opposing brief for motion Review list of documents to be assembled for opposition	.30	259.50

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

Client/Matter: 22126/0902
Page 170

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/08/19	ACS	Preparation of Opposing brief for motion Re-review amended notice of arbitration for response	.60	519.00
07/08/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon damages expert re response to damages question	.80	692.00
07/08/19	ACS	Review/correct Resp to disc. device Further edit responses to damages questions per telecon D Prager	.40	346.00
07/08/19	ACS	Preparation of Opposing brief for motion Review auditor highlighted fund documents for use in responding to dispositive motion	.50	432.50
07/08/19	GSL	Analysis/Strategy Reviewed and prepared summary of undisputed facts	1.50	442.50
07/08/19	GSL	Analysis/Strategy Reviewed and prepared summary of Platinum criminal trial transcript	.90	265.50
07/08/19	GSL	Analysis/Strategy Continued research - re motion for SJ	3.00	885.00
07/08/19	GSL	Analysis/Strategy Prepared summary of research - re motion for SJ (engagement letters)	2.00	590.00

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

Client/Matter: 22126/0902
Page 171

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/08/19	GSL	Analysis/Strategy Prepared summary of cases - re motion for SJ	.60	177.00
07/08/19	GSL	Analysis/Strategy Continued reviewing platinum criminal trial transcripts	.30	88.50
07/09/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS and damages/valuation/forensic expert	1.70	1,292.00
07/09/19	ASH	Review/correct Discovery device edit response to damages questions	.50	380.00
07/09/19	ASH	Examine Documents Analyze documents regarding dispositive motion	2.40	1,824.00
07/09/19	ACS	Preparation of Opposing brief for motion Re-review notice of arbitration for response to dispositive motion	.40	346.00
07/09/19	ACS	Review/correct Resp to disc. device Further edit response to damages questions	.30	259.50
07/09/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and damages/valuation/forensic expert	1.70	1,470.50

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

Client/Matter: 22126/0902
Page 172

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/09/19	ACS	Review/correct Resp to disc. device Further edit response to damages questions	.20	173.00
07/09/19	ACS	Preparation of Opposing aff for motion Draft affidavit in opposition to the dispositive motion	1.50	1,297.50
07/09/19	GSL	Analysis/Strategy Research - in pari delicto - re motion for SJ	2.40	708.00
07/10/19	ASH	Preparation for Deposition Prepare extensive plan for deposition preparation; analyze numerous documents regarding same	2.70	2,052.00
07/10/19	ASH	Analysis of Trial transcript Shearer testimony in criminal trial	1.10	836.00
07/10/19	ASH	Preparation of Opposing brief for motion Prepare inserts for opposition to motion for summary judgment	2.30	1,748.00
07/10/19	ASH	Analysis of Legal Papers Summary of transcripts from GSL	.30	228.00
07/10/19	ACS	Review/correct Opposing aff for motion Draft affidavit in opposition to dispositive motion	.80	692.00

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

Client/Matter: 22126/0902
Page 173

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/10/19	ACS	Preparation of Opposing brief for motion Draft memo of law in opposition to dispositive motion	3.10	2,681.50
07/10/19	GSL	Analysis/Strategy Continued review of platinum criminal trial transcripts Re: Arbitration Claims	2.90	855.50
07/11/19	ASH	Examine Documents Run searches and analyze documents regarding audits conducted by auditors and loans by PPCO to PPVA	2.20	1,672.00
07/11/19	ASH	Preparation of Legal Papers Prepare detailed summary regarding prior and current auditors	1.60	1,216.00
07/11/19	ASH	Correspondence w/CoCounsel - Other with Trey Rogers regarding work by auditors	.20	152.00
07/11/19	ASH	Preparation of Opposing brief for motion Factual summary	.80	608.00
07/11/19	ACS	Preparation of Opposing brief for motion Draft memo of law in opp to dispositive motion	1.80	1,557.00
07/11/19	ACS	Preparation of Reply aff. for motion Draft affidavit in opp to dispositive motion	.30	259.50

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

Client/Matter: 22126/0902
Page 174

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/11/19	GSL	Analysis/Strategy Continued platinum criminal trial transcript review	1.80	531.00
07/12/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS regarding depositions	.50	380.00
07/12/19	ASH	Analysis of Correspondence From James Robertson and David Cheifetz regarding hearing date and briefing	.10	76.00
07/12/19	ASH	Analysis of Trial transcript Run sample searches on criminal trial transcripts	.40	304.00
07/12/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH re depositions	.50	432.50
07/12/19	ACS	Preparation of Opposing brief for motion Draft memo in opposition to dispositive motion	3.10	2,681.50
07/12/19	GSL	Analysis/Strategy Continued review of platinum criminal trial transcripts Re: Arbitration Claims	2.40	708.00
07/13/19	ASH	Examine Documents Analyze documents relating to work performed by respondents	2.20	1,672.00

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

Client/Matter: 22126/0902
Page 175

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/13/19	ASH	Preparation of e-mail(s) To ACS regarding issues relating to arbitration	.30	228.00
07/13/19	ASH	Preparation for Deposition list of issues for auditing standards expert regarding assistance required to prepare for depositions	1.60	1,216.00
07/14/19	ASH	Correspondence w/CoCounsel - Other to representatives of Goldin Associates regarding task list for discovery; review documents regarding same	.50	380.00
07/15/19	ASH	Preparation for Deposition outline listing information needed from auditing standards expert and assistant to auditing standards expert for discovery; analyze background documents regarding same	.90	684.00
07/15/19	ASH	Telephone Call(s) w/CoCounsel - Other telephone conference with ACS; auditing standards expert and assistant to auditing standards expert	1.30	988.00
07/15/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with ACS and Trey Rogers regarding facts relating to discovery and respondents' motion for summary judgment	.30	228.00

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

Client/Matter: 22126/0902
Page 176

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/15/19	ACS	Preparation of Opposing brief for motion Draft brief in opposition to dispositive motion	2.10	1,816.50
07/15/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon auditing expert	1.30	1,124.50
07/15/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon T Rogers	.30	259.50
07/15/19	GSL	Analysis/Strategy Continued research - re opposition to motion for SJ	4.30	1,268.50
07/15/19	GSL	Analysis/Strategy Continued review and summary of criminal trial transcripts	4.70	1,386.50
07/16/19	ASH	Preparation of Opposing brief for motion Prepare insert into factual discussion in opposition to respondents' motion for summary judgment	3.20	2,432.00
07/16/19	ASH	Analysis of Legal Papers Documents regarding corporate structure; e-mail to ACS regarding same	.30	228.00
07/16/19	ASH	Correspondence w/CoCounsel - Other To Trey Rogers and Alois Chakabva requesting factual information	.50	380.00

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

Client/Matter: 22126/0902
Page 177

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/16/19	ASH	Correspondence w/CoCounsel - Other to assistant to auditing expert regarding factual issue; review background documents regarding same	.30	228.00
07/16/19	ACS	Conference(s) w/ CoCounsel - Other Meet with GSL re: Opposition to Motion for SJ	.40	346.00
07/16/19	ACS	Preparation of Opposing brief for motion Draft brief in opposition to dispositive motion	2.30	1,989.50
07/16/19	GSL	Analysis/Strategy Continued review and summary of criminal trial transcripts	1.30	383.50
07/16/19	GSL	Conference(s) In Office Meeting with ACS to discuss drafting - re opposition to motion for SJ	.30	88.50
07/16/19	GSL	Memorandum re Reply brief for motion Drafted section of opposition to motion for SJ	6.00	1,770.00
07/17/19	ASH	Analysis of Trial transcript Review transcripts from criminal trial of testimony of Shearer	3.10	2,356.00

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

Client/Matter: 22126/0902
Page 178

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/17/19	ASH	Preparation of Opposing brief for motion Insert into Memorandum of Law in Opposition to Motion for Summary Judgment	3.70	2,812.00
07/17/19	ASH	Correspondence w/CoCounsel - Other To Kevin Melfi and Zach Bergquist regarding electronic documents and discovery	.20	152.00
07/17/19	ASH	Correspondence w/CoCounsel - Other to Trey Rogers requesting information and documentation	.40	304.00
07/17/19	ASH	Examine Documents Run searches for and analyze papers relating to motion for summary judgment	4.30	3,268.00
07/17/19	ASH	Telephone Call(s) w/CoCounsel - Other with Trey Rogers regarding facts and documents (2)	.80	608.00
07/17/19	ACS	Preparation of Opposing brief for motion Draft opposition memo to dispositive motion	3.60	3,114.00
07/17/19	JKH	Document Production Preparing and sending document production to R. Butcher and A. Chakabva	.40	118.00
07/17/19	JKH	Review Documents SSC - review of document production letter and updating production chart	.20	59.00

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

Client/Matter: 22126/0902
Page 179

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/18/19	ASH	Examine Documents Review and assemble documents relevant to motion for summary judgment filed by respondents	3.40	2,584.00
07/18/19	ASH	Preparation of Opposing brief for motion Prepare factual insert into memorandum of law in opposition to motion for summary judgment	1.40	1,064.00
07/18/19	ASH	Telephone Call(s) w/CoCounsel - Other with Trey Rogers regarding factual matters	.40	304.00
07/18/19	ASH	Correspondence w/CoCounsel - Other To Trey Rogers regarding facts relating to motion for summary judgment filed by respondents (3)	.70	532.00
07/18/19	ASH	Analysis of Trial transcript Review criminal trial transcripts of BW. Robert Shearer	1.10	836.00
07/18/19	GSL	Analysis/Strategy Prepared summary of Adversary document review	.80	236.00
07/18/19	GSL	Analysis/Strategy Continued review of CRZ document production	1.40	413.00

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

Client/Matter: 22126/0902
Page 180

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/18/19	GSL	Analysis/Strategy Continued draft of section for opposition to motion for SJ	1.20	354.00
07/19/19	ASH	Analysis of Legal Papers analysis by assistant to accounting standards expert	.30	228.00
07/19/19	ASH	Examine Documents Documents relating to work performed by respondents; e-mail to ACS regarding same	.40	304.00
07/19/19	ASH	Correspondence w/Adversary With Zach Bergquist regarding documents produced by the Bodner Group; analyze files on Relativity regarding same	.20	152.00
07/19/19	ACS	Preparation of Opposing brief for motion Draft opposition memo to dispositive motion	5.50	4,757.50
07/19/19	GSL	Memorandum re Reply brief for motion Continued draft of section of opposition	.60	177.00
07/19/19	GSL	Analysis/Strategy Additional research - re opposition to motion for SJ	1.40	413.00
07/20/19	ACS	Preparation of Opposing brief for motion Draft opposition memo to dispositive motion	3.40	2,941.00

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

Client/Matter: 22126/0902
Page 181

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/21/19	ASH	Examine Documents Analyze and assemble documents for possible use in opposition to motion for summary judgment	1.20	912.00
07/21/19	ASH	Analysis of Trial transcript Criminal trial transcripts Re: Arbitration Issues	1.10	836.00
07/21/19	ASH	Preparation for Deposition Review documents to prepare for depositions	.80	608.00
07/21/19	ASH	Preparation of e-mail(s) To ACS regarding documents relevant to motion for summary judgment	.50	380.00
07/21/19	ACS	Preparation of Opposing brief for motion Draft opposition memo to dispositive motion	6.30	5,449.50
07/22/19	CMO	Analysis of Legal Papers W/ASH and GSL re:opposition to summary judgment motion	.20	59.00
07/22/19	ASH	Correspondence w/CoCounsel - Other to assistant to auditing standards expert regarding depositions	.90	684.00
07/22/19	ASH	Research re Opposing brief for motion Review cases regarding in pari delicto	.40	304.00

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

Client/Matter: 22126/0902
Page 182

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/22/19	ASH	Examine Documents Documents regarding loans to PPVA and transactions with Chuuk LP	1.10	836.00
07/22/19	ASH	Conference(s) w/ CoCounsel - Other Meetings with GSL and ACS re opposition to dispositive motion	.80	608.00
07/22/19	ACS	Preparation of Opposing brief for motion Draft opposition memo to dispositive motion	10.70	9,255.50
07/22/19	ACS	Preparation of Opposing brief for motion Meetings with GSL and ASH re opposition to dispositive motion	.80	692.00
07/22/19	GSL	Analysis/Strategy Prepared exhibits for opposition to motion for SJ	1.00	295.00
07/22/19	GSL	Analysis/Strategy Review of Black Elk witness testimony at criminal trial (opposition to motion for SJ)	.40	118.00
07/23/19	ASH	Analysis of Trial transcript Summary of testimony of Dixon Yee at criminal trial	.20	152.00

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

Client/Matter: 22126/0902
Page 183

December 23, 2019
BILL NO. 206900

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/23/19 ASH	Analysis of Correspondence from counsel for Respondents submitting material in support of motion for summary judgment and attachments thereto	.20	152.00
07/23/19 ASH	Review/correct Opposing brief for motion Memorandum of Law in Opposition to Respondents' Motion for Summary Judgment	5.10	3,876.00
07/23/19 ACS	Preparation of Opposing brief for motion Draft opposition memo to dispositive motion	6.90	5,968.50
07/23/19 ACS	Preparation of Opposing brief for motion Meetings with GSL and ASH re opposition to dispositive motion	2.00	1,730.00
07/23/19 ACS	Review/correct Opposing aff for motion Edit affidavit in opposition to dispositive motion	.40	346.00
07/23/19 GSL	Analysis/Strategy Review of draft opposition to motion for summary judgment	.70	206.50
07/23/19 GSL	Conference(s) In Office Meeting with ACS and ASH - re opposition to motion for SJ	.50	147.50
07/23/19 WMM	Legal services/Legal Papers Review and revise brief in arbitration.	2.70	2,146.50

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

Client/Matter: 22126/0902
Page 184

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/24/19	ASH	Review/correct Opposing brief for motion Revise Memorandum of Law in Opposition to Respondents' Motion for Summary Judgment	6.30	4,788.00
07/24/19	ASH	Examine Documents Analyze documents relating to opposition to respondents' motion for summary judgment	2.10	1,596.00
07/24/19	ASH	Correspondence w/CoCounsel - Other to auditing standards expert and assistant to auditing standards expert; analyze documents regarding same	.50	380.00
07/24/19	ASH	Research re Opposing brief for motion legal issue relating to Memorandum of Law in Opposition to Respondents' Motion for Summary Judgment	.80	608.00
07/24/19	ASH	Analysis of Legal Papers auditing standards re: Dispositive Motion	.60	456.00
07/24/19	ASH	Analysis of Memorandum Analysis from auditing standards expert	.70	532.00
07/24/19	EBW	Preparation of Legal Papers Arbitration - review of opposition to motion for summary judgment.	.90	688.50

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

Client/Matter: 22126/0902
Page 185

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/24/19	ACS	Review/correct Opposing aff for motion Edit affidavit in opposition to dispositive motion	.50	432.50
07/24/19	ACS	Review/correct Opposing brief for motion Edit opposition to dispositive motion	9.60	8,304.00
07/24/19	GSL	Analysis/Strategy Continued preparing exhibits in support of opposition to motion for SJ	8.30	2,448.50
07/24/19	GSL	Analysis/Strategy Provided ASH with summary of research - re SEC regulation S-X	.80	236.00
07/24/19	GSL	Analysis/Strategy Prepared index for exhibits - re opposition to motion for SJ	.50	147.50
07/24/19	WMM	Legal services/Legal Papers Continue analyzing and revising brief.	4.50	3,577.50
07/25/19	ASH	Review/correct Opposing aff for motion Revise Affidavit of Adam C. Silverstein in opposition to motion to dismiss	1.10	836.00
07/25/19	ASH	Preparation of Legal Papers Analyze documents and select exhibits for appendix of exhibits in opposition to Memorandum of Law in Opposition to Respondents' Motion for Summary Judgment	3.60	2,736.00

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

Client/Matter: 22126/0902
Page 186

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/25/19	ASH	Correspondence w/Adversary to arbitrators regarding submission of papers in opposition to respondents' motion for summary judgment	.90	684.00
07/25/19	ASH	Review/correct Legal Papers Revise Appendix of Exhibits	.50	380.00
07/25/19	ACS	Review/correct Opposing brief for motion Edit and finalize opposition to dispositive motion and finalize for filing	12.50	10,812.50
07/25/19	GSL	Memorandum re Reply brief for motion Continued preparing index for exhibit list	1.40	413.00
07/25/19	GSL	Memorandum re Reply brief for motion Continued preparing pdf exhibits to opposition	2.50	737.50
07/25/19	GSL	Analysis/Strategy Research - adverse interest exception - re opposition to motion for SJ	.40	118.00
07/25/19	GSL	Memorandum re Reply brief for motion Final review and preparation of opposition to motion for SJ for filing	8.00	2,360.00
07/25/19	WMM	Legal services/Legal Papers Complete review of brief and communications concerning same.	.90	715.50

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

Client/Matter: 22126/0902
Page 187

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/26/19	ASH	Correspondence w/CoCounsel - Other to DTI regarding preparation of filing copies of papers in opposiiton to respondents' motion for summary judgment	.60	456.00
07/26/19	ASH	Conference(s) w/ CoCounsel - Other with ACS and GSL regarding next steps	.40	304.00
07/26/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and GSL re: preparing for depositions	.50	432.50
07/26/19	GSL	Memorandum re Reply brief for motion Prepared Final Exhibit List for Binding - re opposition to motion for SJ	.20	59.00
07/26/19	GSL	Conference(s) In Office Meeting with ACS and ASH - re prep for September depositions	.50	147.50
07/26/19	JKH	Prepare Legal Papers Preparing exhibits to Opposition for motion for summary judgment	3.20	944.00
07/29/19	ASH	Review/correct Legal Papers Appendix of exhibits for arbitrators and table of contents for same	1.10	836.00
07/29/19	ASH	Preparation of Legal Papers Compendium of authorities and table of contents for same	1.60	1,216.00

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

Client/Matter: 22126/0902
Page 188

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/29/19	ASH	Examine Documents Respondents' books of exhibits in support of motion for summary judgment	.60	456.00
07/30/19	ASH	Correspondence w/Arbitration tribunal Prepare letter to arbitrators regarding opposition to respondents' motion for summary judgment; arrangements for sending out same	1.20	912.00
07/30/19	ASH	Correspondence w/CoCounsel - Other to auditing standards expert and assistance to auditing standards expert	.20	152.00
07/31/19	ASH	Analysis of Legal Papers Summaries of criminal transcripts from GSL	.20	152.00
07/31/19	ASH	Correspondence w/CoCounsel - Other to auditing standards expert and assistant to auditing standards expert regarding transcripts and factual issues relating to depositions (4)	.40	304.00
07/31/19	ASH	Correspondence w/CoCounsel - Other to internal team and damages and valuation expert regarding motion for summary judgment	.20	152.00
07/31/19	ASH	Correspondence w/Arbitration tribunal to arbitration panel and opposing counsel regarding opposition to motion for summary judgment (2)	.60	456.00

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

Client/Matter: 22126/0902
Page 189

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/31/19	ASH	Examine Documents Deposition preparation	.50	380.00
07/31/19	ASH	Preparation for Deposition Deposition preparation	.60	456.00
07/31/19	GSL	Analysis/Strategy Criminal Transcript Summary for ASH	1.00	295.00
08/01/19	ASH	Correspondence w/Adversary to respondent in arbitration regarding request for production of documents	1.70	1,292.00
08/01/19	ASH	Correspondence w/Adversary to auditing standards expert and assistant to auditing standards expert (7)	.50	380.00
08/01/19	ASH	Analysis of Stipulation Confidentiality order in arbitration	.20	152.00
08/01/19	ASH	Correspondence w/CoCounsel - Other to Alois Chakabva; Karthik Bhavaraju and Trey Rogers requesting documentation	.20	152.00
08/02/19	ASH	Analysis of Correspondence Analyze request for information regarding damages from opposing counsel; analyze disclosure regarding damages to determine extent of disclosure required	.30	228.00

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

Client/Matter: 22126/0902
Page 190

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/06/19	ASH	Examine Documents Review documents to prepare for respondents' depositions	3.10	2,356.00
08/06/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with Trey Rogers regarding preparation for depositions	.60	456.00
08/06/19	ASH	Examine Documents analysis by auditing standards expert and forensic damages and valuation expert	.40	304.00
08/06/19	ASH	Correspondence w/Adversary with auditing expert standards expert	.10	76.00
08/06/19	ASH	Examine Documents Analyze documents underlying disclosure regarding damages	.60	456.00
08/06/19	ASH	Analysis of Legal Papers Documents from custodian	.50	380.00
08/07/19	ASH	Preparation for Deposition Analyze documents to prepare for depositions of representatives of respondents; begin preparing deposition outline	5.90	4,484.00
08/07/19	GSL	Analysis/Strategy Prepared draft deposition outline	1.50	442.50

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

Client/Matter: 22126/0902
Page 191

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/07/19	GSL	Analysis/Strategy Continued draft deposition outline	1.30	383.50
08/08/19	ASH	Preparation for Deposition Outline for deposition preparation of Trey Rogers; analyze documents from regarding same; correct draft of same from GSL	2.10	1,596.00
08/08/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS regarding status and strategy	1.40	1,064.00
08/08/19	ASH	Correspondence w/CoCounsel - Other Numerous to auditing standards expert and assistant to auditing standards expert; analyze documents relating to correspondence	1.40	1,064.00
08/08/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH re status and strategy re arbitration	1.40	1,211.00
08/08/19	GSL	Analysis/Strategy Continued deposition outline	3.10	914.50
08/09/19	ASH	Conference(s) w/ CoCounsel - Other Meet with T Rogers; A Chakabva; ACS and GSL to respond to damages documentation inquiry in arbitration and upcoming depositions	1.80	1,368.00

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

Client/Matter: 22126/0902
Page 192

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/09/19	ASH	Preparation for Deposition Outline for use during deposition preparation of Trey Rogers	1.90	1,444.00
08/09/19	ASH	Examine Documents Analyze damages disclosure and documents produced to determine documents supporting damages disclosure	2.10	1,596.00
08/09/19	ASH	Examine Documents Prepare chart of documents for damages disclosure	1.10	836.00
08/09/19	ASH	Correspondence w/CoCounsel - Other to Trey Rogers regarding documents needed relating to damages disclosure; conduct searches regarding documents needed	.50	380.00
08/09/19	ASH	Telephone Call(s) w/CoCounsel - Other with Trey Rogers regarding documents	.20	152.00
08/09/19	ACS	Conference(s) w/ CoCounsel - Other Meet with T. Rogers; A. Chakabva; ASH and GSL to respond to damages documentation inquiry in arbitration and to prep T. Rogers for deposition	1.80	1,557.00
08/09/19	ACS	Analysis of Reply brief for motion Review reply on dispositive motion to dismiss arbitration and annotate	1.30	1,124.50

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

Client/Matter: 22126/0902
Page 193

December 23, 2019
BILL NO. 206900

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/09/19 GSL	Conference(s) In Office Meeting - re damages - ACS; ASH; Trey; Alois	1.80	531.00
08/09/19 GSL	Analysis/Strategy Prepared summary of bates ranges - re documents supporting damages	2.40	708.00
08/09/19 GSL	Analysis/Strategy Reviewed Reply to Opposition to motion for SJ	.60	177.00
08/10/19 ASH	Examine Documents Analyze documents relating to damages claim	4.20	3,192.00
08/10/19 ASH	Preparation of Resp to disc. device Prepare list of documents relating to damages claim	1.50	1,140.00
08/10/19 ASH	Correspondence w/CoCounsel - Other to Trey Rogers requesting information relating to damages claims	.50	380.00
08/10/19 ACS	Correspondence w/CoCounsel - Other E-mails to Receiver and Receiver's professionals re comments on reply to dispositive motion to dismiss arbitration	.70	605.50
08/12/19 ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with expert; assistant to expert and ACS	1.80	1,368.00

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

Client/Matter: 22126/0902
Page 194

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/12/19	ASH	Telephone Call(s) w/CoCounsel - Other Trey Rogers regarding documents	.20	152.00
08/12/19	ASH	Examine Documents Documents relating to damages disclosure; additional documents from Trey Rogers	.80	608.00
08/12/19	ASH	Correspondence w/CoCounsel - Other Trey Rogers and representatives of Strategic regarding documents uploaded for possible production	.20	152.00
08/12/19	ASH	Correspondence w/CoCounsel - Other to auditing standards expert and assistant to auditing standards expert	.30	228.00
08/12/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon auditing expert	1.80	1,557.00
08/12/19	ACS	Preparation of Correspondence Draft response to Cheifetz e-mail re request for documents supporting response to damages questions	.30	259.50
08/12/19	ACS	Review/correct Correspondence Edit and send response to Cheifetz e-mail re request for documents supporting response to damages questions	.20	173.00

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

Client/Matter: 22126/0902
Page 195

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/12/19	GSL	Research re Reply Follow-up research/review - reply to Opposition	1.20	354.00
08/12/19	GSL	Preparation of Exhibits for deposition Vendor Document Review - re prep for T. Rogers Deposition	2.00	590.00
08/13/19	ACS	Correspondence w/CoCounsel - Other E-mail and proposed status report from J. Grekin (.1); e-mails from/to M. Brandylyons re same (.1); revise proposed status report and e-mail to J. Grekin (.2)	.40	346.00
08/14/19	ASH	Preparation for Deposition Depositions of Trey Rogers and Jennifer Lange	5.60	4,256.00
08/14/19	ASH	Analysis of Reply brief for motion Respondents' Reply Memorandum in support of Motion for Summary Judgment	1.30	988.00
08/14/19	GSL	Research re Reply Continued research - re follow up questions to Auditor's reply	1.00	295.00
08/15/19	ASH	Conference(s) w/ CoCounsel - Other Meet with Trey Rogers and ACS and GSL re deposition preparation for Trey Rogers and to take Jennifer Lange	2.50	1,900.00

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

Client/Matter: 22126/0902
Page 196

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/15/19	ASH	Conference(s) w/ CoCounsel - Other Conference call with ACS; GSL; Trey Rogers; auditing standards expert and assistant to auditing standards expert	1.00	760.00
08/15/19	ASH	Analysis of Deposition Deposition of Jennifer Lange	.60	456.00
08/15/19	ACS	Conference(s) w/ CoCounsel - Other Meet with T. Rogers and ASH and GSL re deposition preparation for T. Rogers and to take J. Lange (2.5) and telecon with auditing experts (1)	3.50	3,027.50
08/15/19	GSL	Research re Reply Continued research - re follow-up questions on Auditor's reply	.70	206.50
08/15/19	GSL	Conference(s) In Office Trey Deposition prep - meeting with ACS; ASH; and Trey	4.00	1,180.00
08/16/19	CMO	Preparation of e-mail(s) Re: audit partners depositions	.10	29.50
08/16/19	ASH	Conference(s) w/ CoCounsel - Other Meet with damages expert and ACS	2.50	1,900.00
08/16/19	ASH	Examine Documents Documents for production to respondents in arbitration	.60	456.00

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

Client/Matter: 22126/0902
Page 197

December 23, 2019
BILL NO. 206900

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/16/19 ASH	Examine Documents Analyze documents for production	.60	456.00
08/16/19 ACS	Conference(s) w/ CoCounsel - Other Meet with damages and valuation expert and ASH	2.60	2,249.00
08/16/19 GSL	Research re Reply Continued research/review - re follow-up questions to Auditor's reply	4.00	1,180.00
08/16/19 GSL	Analysis of Reply Prepared summary of research/review - re follow-up questions to reply	3.00	885.00
08/16/19 GSL	Preparation of Exhibits for deposition Document review on Agnes -- re Trey deposition prep	1.00	295.00
08/17/19 ASH	Correspondence w/CoCounsel - Other to valuation and forensic accounting expert regarding documents	.30	228.00
08/17/19 ASH	Examine Documents Analyze documents produced to opposing party regarding valuation issues	5.40	4,104.00
08/18/19 ASH	Analysis of Memorandum Analyze draft regarding auditing deficiencies	1.10	836.00

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

Client/Matter: 22126/0902
Page 198

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/18/19	ASH	Examine Documents Analyze and assemble documents regarding valuations	3.50	2,660.00
08/18/19	ASH	Correspondence w/CoCounsel - Other To Strategic regarding documents to be produced and review background documents regarding same (.2); to auditing standards expert and assistant (.1); to forensic and valuation expert (.2); to Brent Weisenberg regarding documents to be produced and analyze documents regarding same (.2)	.70	532.00
08/19/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with EBW; GSL and Brent Weisenberg regarding deposition preparation	1.00	760.00
08/19/19	ASH	Preparation for Deposition Analyze documents for depositions	4.40	3,344.00
08/19/19	ASH	Correspondence w/CoCounsel - Other Troy Sarpen regarding documents	.30	228.00
08/19/19	ASH	Examine Documents Documents regarding valuations	1.20	912.00
08/19/19	ASH	Correspondence w/CoCounsel - Other with Trey Rogers regarding recently received documents	.20	152.00

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

Client/Matter: 22126/0902
Page 199

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/19/19	ACS	Preparation for Deposition Review and annotate draft outline from auditing expert	1.30	1,124.50
08/20/19	CMO	Preparation for Deposition Review case schedule and ascertain what will be needed for audit partner depositions	.80	236.00
08/20/19	CMO	Preparation for Deposition Email court reporter's scheduling department re: arrangements for depositions of Lange and Levy	.30	88.50
08/20/19	ASH	Conference(s) w/ CoCounsel - Other ACS and GSL regarding discovery and dispositive motion	.90	684.00
08/20/19	ASH	Correspondence w/CoCounsel - Other To Zach Bregquist of Strategic regarding document productions and searches (5)	.30	228.00
08/20/19	ACS	Research re Court (motion) Review research memo by GSL re reply arguments on dispositive motion and comment	.70	605.50
08/20/19	ACS	Preparation for Deposition Review audit expert draft of Lange outline and annotate	.80	692.00

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

Client/Matter: 22126/0902
Page 200

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/20/19	ACS	Correspondence w/CoCounsel - Other E-mail to audit expert re Lange deposition	.40	346.00
08/20/19	ACS	Analysis of Legal Papers Review valuation expert's analysis of auditor valuation flaws	.90	778.50
08/20/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and GSL re deposition preparation	.50	432.50
08/20/19	GSL	Analysis of Correspondence Reviewed correspondence - re production of documents	1.40	413.00
08/21/19	CMO	Preparation of e-mail(s) To court reporter re: confirmation of arrangements re: Lange deposition	.20	59.00
08/21/19	CMO	Preparation of e-mail(s) To court reporter re: confirmationn of arrangements re: Levy deposition	.20	59.00
08/21/19	ASH	Correspondence w/CoCounsel - Other with representatives of Strategic regarding issues relating to additional document production	.40	304.00

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

Client/Matter: 22126/0902
Page 201

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/21/19	ASH	Correspondence w/Adversary to counsel for respondents regarding production of additional documents and request for production of additional documents by respondents; analyze background documents regarding same	1.60	1,216.00
08/21/19	ASH	Correspondence w/CoCounsel - Other to assistant to auditing standards expert regarding documents	.20	152.00
08/21/19	ASH	Examine Documents Analyze documents for production to respondents	1.20	912.00
08/21/19	ASH	Preparation for Deposition Documents for use at depositions of respondents and Trey Rogers	2.50	1,900.00
08/21/19	ASH	Examine Documents with Troy Sarpen regarding documents for production	.20	152.00
08/21/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS and GSL re supplemental production	.20	152.00
08/21/19	ACS	Preparation for Deposition Continued review of valuation expert's analysis of audit firm's valuations and inserting of comments/questions	.60	519.00

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

Client/Matter: 22126/0902
Page 202

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/21/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and GSL re supplemental production	.20	173.00
08/22/19	JKH	Review Documents Review Documents	3.80	1,121.00
08/23/19	ASH	Examine Documents document requests from respondents and responses	.60	456.00
08/23/19	ASH	Preparation for Deposition Prepare for depositions of respondents	2.30	1,748.00
08/23/19	ASH	Correspondence w/Adversary with counsel for auditor regarding document productions	.30	228.00
08/23/19	ASH	Correspondence w/CoCounsel - Other to assistant to auditing expert regarding documents and analysis (2)	.20	152.00
08/23/19	ASH	Analysis of Correspondence Letter from counsel for auditor regarding document production	.20	152.00
08/23/19	GSL	Preparation of Correspondence Prepared draft letter - notice of production - re confidentiality order	.30	88.50

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

Client/Matter: 22126/0902
Page 203

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/23/19	GSL	Research re Reply Continued research - re reply	2.50	737.50
08/23/19	GSL	Preparation for Deposition Review of documents - re deposition prep	.70	206.50
08/23/19	GSL	Analysis/Strategy Review of next steps with ASH - deposition prep	.50	147.50
08/24/19	ASH	Examine Documents Analyze; organize; and select documents produced by both claimant and respondents for depositions; run searches for documents produced by Respondents for possible use at depositions	7.10	5,396.00
08/24/19	ASH	Preparation for Deposition Outline for depositions	4.70	3,572.00
08/25/19	ASH	Telephone Call(s) w/CoCounsel - Other Analyze and organize documents for depositions	3.40	2,584.00
08/25/19	ASH	Preparation for Deposition Outline for depositions	2.50	1,900.00
08/25/19	ASH	Preparation of e-mail(s) To ACS and GSL regarding issues relating to upcoming depositions (5)	.40	304.00

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

Client/Matter: 22126/0902
Page 204

December 23, 2019
BILL NO. 206900

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/25/19 ASH	Analysis of Memorandum Memo from assistant to expert witness regarding deposition preparation	.50	380.00
08/26/19 ASH	Telephone Call(s) w/CoCounsel - Other with ACS and GSL regarding depositions of respondents	.50	380.00
08/26/19 ASH	Examine Documents Documents produced by claimant and respondents; e-mails to ACS and GSL regarding same	.30	228.00
08/26/19 ACS	Conference(s) w/ CoCounsel - Other Meeting with Receiver; EBW; JSF; M Kirschner; CSolvSIG; W Edwards and telecon R Saltzman re Abdala situation	.80	692.00
08/26/19 ACS	Conference(s) w/ CoCounsel - Other Meet with GSL and ASH re deposition preparation	.50	432.50
08/26/19 ACS	Preparation for Deposition Review and annotate audit experts e-mails re deposition questions	.80	692.00
08/26/19 ACS	Preparation for Deposition Begin outlining for auditor depositions	1.80	1,557.00

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

Client/Matter: 22126/0902
Page 205

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/26/19	GSL	Telephone Call(s) re: Conference Call with ASH and ACS - next steps for depositions	.50	147.50
08/27/19	ASH	Correspondence w/CoCounsel - Other to auditing standards expert and assistant to expert; review documents sent	.20	152.00
08/27/19	ACS	Preparation for Deposition Outline for auditor depositions	4.40	3,806.00
08/27/19	GSL	Preparation for Deposition Document review - re deposition prep	1.00	295.00
08/28/19	ACS	Correspondence w/Adversary E-mail to J Bernard and D Cheifetz	.10	86.50
08/28/19	ACS	Preparation for Deposition Outline for auditor depositions	3.60	3,114.00
08/28/19	ACS	Correspondence w/CoCounsel - Other E-mails from/to auditing expert	.40	346.00
08/28/19	GSL	Preparation for Deposition Continued document review - re deposition prep	2.50	737.50
08/29/19	ASH	Preparation of e-mail(s) to ACS regarding strategy for depositions of respondents	.30	228.00

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

Client/Matter: 22126/0902
Page 206

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/29/19	ACS	Correspondence w/Adversary E-mail to J Bernard	.10	86.50
08/29/19	ACS	Analysis of Legal Papers Analyze auditing expert analysis and e-mail auditing expert re same	.80	692.00
08/29/19	ACS	Preparation for Deposition Review workpapers for use in auditor depositions and relevant auditing standards	6.10	5,276.50
08/29/19	GSL	Preparation for Deposition Continued document review - re deposition prep	.70	206.50
08/29/19	GSL	Preparation for Deposition Continued document review - re deposition prep	2.60	767.00
08/30/19	ACS	Preparation for Deposition Review workpapers and audit standards and outline for deposition	3.20	2,768.00
08/30/19	GSL	Preparation for Deposition Preparation of deposition outline	4.20	1,239.00
08/30/19	GSL	Preparation for Deposition Relativity Document Review - re deposition prep	3.40	1,003.00

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

Client/Matter: 22126/0902
Page 207

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/31/19	GSL	Preparation for Deposition Continued preparation of deposition outline	1.90	560.50
09/01/19	ACS	Preparation for Deposition Review binders prepared by audit expert re valuations and revise deposition outline	1.50	1,297.50
09/02/19	ACS	Preparation for Deposition Review binders prepared by audit expert re valuations and revise deposition outline	2.50	2,162.50
09/03/19	ASH	Conference(s) w/ CoCounsel - Other Meet with Trey Rogers; ACS and GSL regarding deposition preparation	2.50	1,900.00
09/03/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with ACS and GSL regarding preparation for deposition of Trey Rogers	1.00	760.00
09/03/19	ASH	Examine Documents Analyze documents regarding Sterling and valuation issues	.90	684.00
09/03/19	ACS	Correspondence w/Adversary E-mail from/to J. Bernard	.20	173.00
09/03/19	ACS	Preparation for Deposition Review and annotate T. Rogers deposition preparation outline	.80	692.00

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

Client/Matter: 22126/0902
Page 208

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/03/19	ACS	Preparation for Deposition Meet with ASH and GSL re preparation for T. Rogers deposition	1.00	865.00
09/03/19	ACS	Preparation for Deposition Review audit valuation work and outline for auditor depositions	4.20	3,633.00
09/03/19	ACS	Preparation for Deposition Meet with T Rogers re dep prep	2.50	2,162.50
09/03/19	GSL	Preparation for Conference Team Meeting - re preparation for meeting with witness	1.00	295.00
09/03/19	GSL	Preparation for Deposition Document Review - re deposition exhibits	2.60	767.00
09/03/19	GSL	Preparation for Deposition Meeting with witness - deposition prep	2.50	737.50
09/04/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS and Trey Rogers to prepare Trey Rogers for his deposition	3.10	2,356.00
09/04/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS and GSL re auditor depositions	.20	152.00

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

Client/Matter: 22126/0902
Page 209

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/04/19	ASH	Examine Documents regarding valuations	1.60	1,216.00
09/04/19	ASH	Correspondence w/CoCounsel - Other With Troy Sarpen and assistant to auditing standards expert regarding valuation issues	.30	228.00
09/04/19	ACS	Preparation for Deposition Outline for auditor depositions	4.20	3,633.00
09/04/19	ACS	Preparation for Deposition Meet with ASH and T Rogers to prep T Rogers for his deposition	3.10	2,681.50
09/04/19	ACS	Preparation for Deposition Meet with ASH and GSL re auditor depositions	.20	173.00
09/04/19	ACS	Preparation for Deposition Review emails for auditor deposition	.90	778.50
09/04/19	GSL	Preparation for Deposition Continued document review - re deposition prep	.70	206.50
09/05/19	ASH	Conference/ Accountants Meet with auditing standards expert and assistant to auditing standards expert to prepare for depositions	4.00	3,040.00

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

Client/Matter: 22126/0902
Page 210

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/05/19	ASH	Preparation for Deposition Prepare for deposition of auditor	.90	684.00
09/05/19	ASH	Conference/ Accountants Meet with assistant to auditing standards expert regarding issues relating to deposition	.50	380.00
09/05/19	ASH	Examine Documents Additional documents produced by Respondents	.50	380.00
09/05/19	ACS	Preparation for Deposition Review additional workpapers and revise outline of auditor dep	4.70	4,065.50
09/05/19	ACS	Conference(s) w/ CoCounsel - Other Meet with audit experts for deposition preparation	4.00	3,460.00
09/05/19	GSL	Preparation of Exhibits for deposition Prepare for Deposition of Auditor - prepare exhibits	11.00	3,245.00
09/05/19	JKH	Review Documents Review document production and prepare copies for team	.20	59.00
09/06/19	ASH	Attendance at Deposition Deposition of auditor	8.00	6,080.00

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

Client/Matter: 22126/0902
Page 211

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/06/19	ASH	Conference(s) w/ CoCounsel - Other Post-deposition analysis with auditing standards expert and assistant to auditing standards expert	.80	608.00
09/06/19	ASH	Preparation for Deposition Prepare for deposition of auditor	.40	304.00
09/06/19	ACS	Preparation for Deposition Prepare for first auditor deposition	1.50	1,297.50
09/06/19	ACS	Preparation for Deposition Take first auditor deposition	8.00	6,920.00
09/06/19	ACS	Conference(s) w/ CoCounsel - Other Post deposition analysis with experts	.80	692.00
09/06/19	JKH	Review/analyze Reviewing and preparing copies of document production	.30	88.50
09/07/19	ASH	Examine Documents Analyze correspondence regarding scheduling; numerous emails to ACS; GSL and AW regarding same	.50	380.00
09/09/19	ASH	Conference(s) w/ CoCounsel - Other Meet with Trey Rogers and ACS to prepare Trey Rogers for his deposition	5.10	3,876.00

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

Client/Matter: 22126/0902
Page 212

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/09/19	ACS	Preparation for Deposition Meet with ASH and T Rogers to prepare T Rogers for his deposition	5.20	4,498.00
09/10/19	CMO	Preparation of e-mail(s) To court reporter re: transcripts and ShareFile delivery	.20	59.00
09/10/19	CMO	Review file re Deposition Re: deposition bundle relating to Lange deposition	.90	265.50
09/10/19	CMO	Review file re Deposition Reporter's ShareFile re: depositions	.20	59.00
09/10/19	ASH	Examine Documents Criminal Trial Transcripts; e-mail to ACS regarding same	.90	684.00
09/10/19	ASH	Preparation for Deposition meetings with ACS and Trey Rogers to prepare Trey Rogers for his deposition	4.00	3,040.00
09/10/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS and EBW regarding Trey Rogers deposition	.50	380.00
09/10/19	ASH	Correspondence w/Adversary With David Cheifetz regarding deposition of Trey Rogers	.20	152.00

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

Client/Matter: 22126/0902
Page 213

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/10/19	ASH	Telephone Call(s) w/CoCounsel - Other with Trey Rogers regarding his deposition	.20	152.00
09/10/19	EBW	Preparation for Deposition Arbitration - preparation for T. Rogers deposition.	1.80	1,377.00
09/10/19	ACS	Preparation for Deposition Meetings with ASH and T Rogers to prepare him for his deposition	4.00	3,460.00
09/11/19	ASH	Attendance at Deposition Deposition of Trey Rogers	9.00	6,840.00
09/11/19	EBW	Attend. at Exam B/T Arbitration - attend and defend T. Rogers deposition.	8.50	6,502.50
09/11/19	ACS	Attendance at Deposition Attend T. Rogers deposition in arbitration (ACS time at deposition)	5.00	4,325.00
09/12/19	ASH	Analysis of Correspondence Review e-mails from Bernice Leber re neutral selection	.20	152.00
09/12/19	ASH	Correspondence w/CoCounsel - Other with assistant to auditing standards expert regarding documents	.20	152.00

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

Client/Matter: 22126/0902
Page 214

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/12/19	ASH	Analysis of Legal Papers Research and documents regarding potential arbitrators to replace arbitrators who passed away	1.40	1,064.00
09/12/19	ACS	Correspondence w/CoCounsel - Other Review e-mails from B Leber re neutral selection	.20	173.00
09/12/19	ACS	Analysis of Legal Papers Re-review CPR rules re replacement of an arbitrator	.10	86.50
09/12/19	ACS	Analysis of Correspondence Review neutral lists forwarded by CPR	.30	259.50
09/12/19	ACS	Analysis of Legal Papers Review expert valuation analysis	.80	692.00
09/13/19	CMO	Analysis of Exhibits for deposition To Trey Rogers deposition	2.50	737.50
09/13/19	CMO	Review file re Exhibits for deposition Prepare Rogers exhibits to go in workspace	1.20	354.00
09/13/19	ASH	Selection of Arbitrators Research regarding numerous possible arbitrators to replace arbitrator who died	3.40	2,584.00

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

Client/Matter: 22126/0902
Page 215

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/13/19	ACS	Analysis of Legal Papers Review and annotate expert valuation analysis	2.60	2,249.00
09/13/19	ACS	Correspondence w/CoCounsel - Other E-mail to GSL re additional work for next auditor deposition	.20	173.00
09/15/19	ASH	Selection of Arbitrators extensive research on Weslaw and internet regarding arbitrators to replace arbitrator who died	4.10	3,116.00
09/16/19	CMO	Preparation of Legal Papers Create binder of Auditor deposition exhibits	2.30	678.50
09/16/19	CMO	Review file re Deposition transcript Prepare set of color blowbacks of deposition exhibits	.80	236.00
09/16/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS regarding arbitrator selection	.20	152.00
09/16/19	ASH	Conference(s) w/ CoCounsel - Other Meet with ACS and GSL regarding preparation for auditor deposition	.60	456.00
09/16/19	ASH	Examine Documents Documents regarding auditor deposition	.70	532.00

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

Client/Matter: 22126/0902
Page 216

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/16/19	ACS	Correspondence w/Client Meet with ASH re arbitrator selection	.20	173.00
09/16/19	ACS	Conference(s) w/ CoCounsel - Other Meet with GSL re status and strategy of arbitration	.50	432.50
09/16/19	ACS	Preparation for Deposition Review first auditor deposition to prepare for second auditor deposition	.50	432.50
09/16/19	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and GSL re second auditor deposition	.60	519.00
09/16/19	ACS	Analysis of Legal Papers Review expert's valuation analysis and annotate	.50	432.50
09/16/19	GSL	Preparation for Deposition Meeting with ACS and ASH - re arbitration deposition prep	.50	147.50
09/16/19	GSL	Preparation for Deposition Re document review - deposition prep	1.20	354.00
09/17/19	CMO	Analysis of Exhibits for deposition For auditor deposition w/ASH	.30	88.50

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

Client/Matter: 22126/0902
Page 217

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/17/19	CMO	Preparation for Deposition Re: Relativity searches for deposition of auditor	.30	88.50
09/17/19	ASH	Conference(s) w/ CoCounsel - Other With possible valuation/damages expert; ACS and Troy Sarpen	2.10	1,596.00
09/17/19	ASH	Preparation for Deposition Analyze documents in preparation for second auditor deposition	3.20	2,432.00
09/17/19	ASH	Preparation of e-mail(s) To representatives of Vendor regarding documents for deposition	.20	152.00
09/17/19	ACS	Correspondence w/CoCounsel - Other E-mail to B Leber and Receiver re arbitrator selection	.10	86.50
09/17/19	ACS	Analysis of Legal Papers Review expert valuation analysis and annotate	1.40	1,211.00
09/17/19	ACS	Preparation for Deposition Prepare for second auditor deposition	.30	259.50
09/17/19	ACS	Correspondence w/Adversary E-mail to J Bernard and D Cheifetz	.10	86.50

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

Client/Matter: 22126/0902
Page 218

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/17/19	ACS	Telephone Call(s) w/Client Meet with ASH and telecon B Leber re neutral selection	.50	432.50
09/17/19	ACS	Preparation for Deposition Review documents to prepare for 2nd arbitrator deposition	1.00	865.00
09/17/19	GSL	Preparation for Deposition Continued document review - re deposition prep	1.80	531.00
09/17/19	GSL	Preparation for Deposition Relativity email review - deposition prep	.50	147.50
09/18/19	ASH	Telephone Call(s) w/CoCounsel - Other With counsel for respondents and ACS regarding arbitrator selection	.40	304.00
09/18/19	ASH	Telephone Call(s) w/CoCounsel - Other With arbitrator regarding arbitrator selection	.20	152.00
09/18/19	ASH	Research re Legal Papers Research regarding potential arbitrator	.70	532.00
09/18/19	ASH	Preparation for Deposition Review documents to prepare for second auditor deposition	3.80	2,888.00

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

Client/Matter: 22126/0902
Page 219

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/18/19	ASH	Analysis of Legal Papers from assistant to auditing standards expert regarding auditing procedures	.20	152.00
09/18/19	ACS	Preparation for Deposition Prepare for 2nd auditor deposition	.50	432.50
09/18/19	ACS	Conference(s) w/ Client Meet with Receiver re arbitrator selection	.20	173.00
09/18/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon B Leber re arbitrator selection	.20	173.00
09/18/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon J Bernard re neutral	.40	346.00
09/18/19	ACS	Preparation for Deposition Prepare for 2nd arbitrator deposition	2.40	2,076.00
09/19/19	CMO	Preparation for Deposition Confirm auditor deposition arrangements	.30	88.50
09/19/19	CMO	Review file re Deposition Prepare Trey Rogers transcript and exhibits to go in workspace	.80	236.00
09/19/19	CMO	Review file re Deposition Organize auditor and Rogers depositions and exhibits for DropBox delivery	.90	265.50

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

Client/Matter: 22126/0902
Page 220

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/19/19	ASH	Conference(s) w/ CoCounsel - Other Meeting with auditing standards expert to prepare for deposition	1.50	1,140.00
09/19/19	ASH	Telephone Call(s) w/CoCounsel - Other With ACS and arbitrator regarding arbitrator selection	.20	152.00
09/19/19	ASH	Preparation for Deposition Analyze documents for second auditor deposition	2.50	1,900.00
09/19/19	ACS	Telephone Call(s) w/CoCounsel - Other Call and e-mails to/from B Leber re neutral selection	.10	86.50
09/19/19	ACS	Correspondence w/Adversary E-mail to J Bernard re neutral selection	.10	86.50
09/19/19	ACS	Preparation for Deposition Prepare for 2nd arbitrator deposition	1.20	1,038.00
09/19/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon B Leber re neutral selection	.20	173.00
09/19/19	ACS	Correspondence w/Adversary Vm from J Bernard and email to J Bernard	.20	173.00

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

Client/Matter: 22126/0902
Page 221

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/19/19	ACS	Conference(s) w/ CoCounsel - Other Meet with and telecon audit expert to prepare for 2nd auditor deposition	3.80	3,287.00
09/19/19	ACS	Preparation for Deposition Outline for 2nd deposition auditor	2.00	1,730.00
09/19/19	GSL	Preparation of Exhibits for deposition Preparation of exhibits for 9/20/19 deposition	6.30	1,858.50
09/20/19	ASH	Preparation for Deposition Second auditor deposition	8.30	6,308.00
09/20/19	ACS	Preparation for Deposition Prepare for 2nd auditor deposition	.50	432.50
09/20/19	ACS	Attendance at Deposition Take 2nd auditor deposition	8.30	7,179.50
09/20/19	GSL	Preparation of Exhibits for deposition Prepared additional exhibits prior to deposition	.80	236.00
09/20/19	GSL	Attendance at Deposition Second Auditor Dep.	8.30	2,448.50

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

Client/Matter: 22126/0902
Page 222

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/21/19	ASH	Selection of Arbitrators Research additional arbitrator suggested by respondents; analyze rules regarding same	1.90	1,444.00
09/21/19	ASH	Analysis of Correspondence Extensive correspondence among ACS; Receiver; opposing counsel and party arbitrators regarding selection of replacement third arbitrator	.20	152.00
09/22/19	ASH	Correspondence w/CoCounsel - Other with ACS; Receiver and party arbitrator regarding arbitrator selection	.60	456.00
09/23/19	CMO	Preparation of e-mail(s) Re: Auditor deposition transcript	.10	29.50
09/23/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone calls with ACS and party arbitrator regarding neutral arbitrator selection (2)	.40	304.00
09/23/19	ASH	Analysis of Correspondence from ACS; opposing counsel and party arbitrator regarding neutral arbitrator selection	.30	228.00
09/23/19	ACS	Preparation of Correspondence Review history of correspondence on neutral selection to prepare for submission and e-mail to B Leber	.90	778.50

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

Client/Matter: 22126/0902
Page 223

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/23/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon B Leber and ASH re neutral selection	.30	259.50
09/23/19	ACS	Preparation of Correspondence Draft e-mail to CPR	.20	173.00
09/23/19	ACS	Correspondence w/CoCounsel - Other E-mails to/from B Leber re neutral selection	.50	432.50
09/23/19	ACS	Correspondence w/CoCounsel - Other E-mail from J Bernard and draft and edit e-mail to C Grace in response	.60	519.00
09/23/19	ACS	Correspondence w/CoCounsel - Other E-mail from/to H Erickson re confidential arbitration	.20	173.00
09/23/19	ACS	Telephone Call(s) w/CoCounsel - Other Telecon B Leber re neutral selection	.10	86.50
09/23/19	ACS	Correspondence w/Adversary E-mails from/to J Bernard and CPR	.30	259.50
09/23/19	ACS	Correspondence w/CoCounsel - Other E-mails to/from H Erickson and B Leber re neutral	.20	173.00

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

Client/Matter: 22126/0902
Page 224

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/23/19	ACS	Correspondence w/Adversary E-mail to J Bernard re arbitration	.30	259.50
09/24/19	CMO	Review file re Exhibits for deposition Check Trey Rogers deposition exhibits binder and finalize set	.30	88.50
09/24/19	ASH	Analysis of Legal Papers Research and review of materials regarding potential arbitrators	.80	608.00
09/24/19	ASH	Telephone Call(s) w/CoCounsel - Other ACS and party arbitrator regarding possible neutral	.50	380.00
09/24/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone conference with ACS and party-selected arbitrator regarding selection of neutral arbitrator	.50	380.00
09/24/19	ASH	Preparation of e-mail(s) E-mails with party arbitrator; ACS and opposing counsel regarding issues relating to selection of neutral arbitrator	.30	228.00
09/24/19	ACS	Correspondence w/CoCounsel - Other E-mail from J Bernard and e-mail to B Leber re neutral selection	.20	173.00

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

Client/Matter: 22126/0902
Page 225

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/24/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon B Leber re neutral selection	.50	432.50
09/24/19	ACS	Correspondence w/Adversary Meet with ASH and e-mail to J Bernard re neutral selection	.50	432.50
09/24/19	ACS	Correspondence w/Adversary E-mail to/from J Bernard re neutral selection	.30	259.50
09/24/19	GSL	Document Review Document Review	1.70	501.50
09/25/19	CMO	Preparation of e-mail(s) To attorneys re: auditor deposition workspace	.10	29.50
09/25/19	CMO	Review file re Deposition Update hard copy deposition files	.80	236.00
09/25/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone conference with ACS and counsel for respondents	.30	228.00
09/25/19	ASH	Telephone Call(s) w/CoCounsel - Other Telephone conference with ACS and party arbitrator	.30	228.00

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

Client/Matter: 22126/0902
Page 226

December 23, 2019
BILL NO. 206900

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/25/19	ASH	Analysis of Correspondence Emails from counsel for respondents; ACS; arbitration association and party arbitrators regarding arbitrator selection	.20	152.00
09/25/19	ASH	Correspondence w/CoCounsel - Other Arbitration association rules regarding selection of replacement arbitrators	.20	152.00
09/25/19	ASH	Correspondence w/Adversary to counsel for respondents regarding deficiencies in document productions; analyze background documents regarding same	3.50	2,660.00
09/25/19	ACS	Telephone Call(s) w/Adversary Meet with ASH and telecon J Bernard re neutral	.30	259.50
09/25/19	ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon B Leber re neutral (2nd call)	.30	259.50
09/25/19	ACS	Correspondence w/Client E-mail to J Bernard re neutral selection	.10	86.50
09/25/19	ACS	Correspondence w/CoCounsel - Other E-mails from/to J Bernard and H Erickson re neutral selection	.70	605.50

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

Client/Matter: 22126/0902
Page 227

December 23, 2019
BILL NO. 206900

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/25/19 ACS	Correspondence w/CoCounsel - Other E-mail to B Leber re neutral selection	.10	86.50
09/26/19 CMO	Review file re Exhibits for deposition Prepare auditor Exhibit binder	.50	147.50
09/26/19 ASH	Correspondence w/Adversary to counsel for respondents regarding discovery issues	3.20	2,432.00
09/26/19 ASH	Analysis of Correspondence Recent correspondence from counsel for Respondents; counsel for Claimant; party arbitrator and arbitration entity regarding arbitrator selection	.20	152.00
09/26/19 ACS	Correspondence w/CoCounsel - Other E-mail to auditor experts	.10	86.50
09/26/19 ACS	Telephone Call(s) w/CoCounsel - Other Telecon B Leber re neutral selection	.10	86.50
09/26/19 ACS	Correspondence w/CoCounsel - Other E-mails to/from H Erickson and J Bernard re arbitration	.40	346.00
09/26/19 ACS	Telephone Call(s) w/CoCounsel - Other E-mails from/to B Leber re neutral selection	.20	173.00
TOTAL PHASE P15		779.00	\$526,664.00

EXHIBIT F

Expense Summary

**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE
STATEMENT PERIOD OF
JULY 1, 2019 THROUGH SEPTEMBER 30, 2019**

Expense Category	Service Provider (if applicable)	Total Expenses ¹
Air Freight (Overnight Courier)	Federal Express	\$661.48
Conference Calls	West Unified (conference call service)	\$3,214.71
Court Reporting Services		\$576.00
Electronic Research	Westlaw, Pacer	\$4,462.36
Filing Fees, Court		\$400.00
Laser Copies (\$.15 per page)		\$3,493.20
Outside Messenger		\$86.50
Photocopies (\$.15 per page)		\$2,360.70
Process Service	Preemptive Process Server, TSI Legal	\$2,082.37
Miscellaneous		\$288.00
Telephone Calls (Tolls Only)		\$30.00
Travel – Out of Town – lodging, etc.	JSF Trip to TX re: Arabella (hotel, airline ticket, car service to and from airport, meals, etc.)	\$1,622.39
TOTAL:		\$19,277.71

¹ 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 11

November 7, 2019
BILL NO. 205862

DISBURSEMENTS FOR YOUR ACCOUNT

Laser Copies	300.75
Court Reporting Services	576.00
Air Freight	61.52
	<hr/>
TOTAL DISBURSEMENTS	938.27

EXHIBIT H

Otterbourg Expense Records

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

Client/Matter: 22126/0902
Page 229

December 23, 2019
BILL NO. 206900

DISBURSEMENTS FOR YOUR ACCOUNT

Laser Copies	3,192.45
Conference Call(s)	3,214.71
Filing Fees, Court	400.00
Miscellaneous	288.00
Electronic Research	4,462.36
Air Freight	599.96
Process Service	2,082.37
Outside Messenger	86.50
Telephone Calls (tolls only)	30.00
Travel-Out of Town-lodging,etc	1,622.39
Photocopies	2,360.70
	<hr/>
TOTAL DISBURSEMENTS	18,339.44

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; :

No. 16-CV-6848 (BMC)

PLATINUM CREDIT MANAGEMENT, L.P.;

MARK NORDLICHT;

DAVID LEVY;

DANIEL SMALL;

URI LANDESMAN;

JOSEPH MANN;

JOSEPH SANFILIPPO; and

JEFFREY SHULSE,

Defendants. :

-----X

**CERTIFICATION IN SUPPORT OF NINTH JOINT INTERIM APPLICATION OF
THE RECEIVER AND OTTERBOURG P.C. FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED DURING
THE PERIOD JULY 1, 2019 THROUGH SEPTEMBER 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 Ninth Joint Interim Application of the Receiver and Otterbourg P.C. for Allowance of Compensation and Reimbursement of Expenses Incurred during the Period July 1, 2019 through September 30, 2019 (the “Ninth Interim Application”).

3. To best of my knowledge, information, and belief formed after reasonable inquiry, the Ninth 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 Ninth Interim Application are based on the rates listed in the Fee Schedule (Exhibit B to the Application), subject to the discounts described in the Ninth 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 Ninth 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: December 24, 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 NINTH JOINT INTERIM APPLICATION
OF THE RECEIVER AND OTTERBOURG P.C. FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED DURING
THE PERIOD JULY 1, 2019 THROUGH SEPTEMBER 30, 2019**

THIS MATTER coming before the Court on the Ninth 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 July 1, 2019 Through September 30, 2019 (the "Ninth Interim Application")¹ [Dkt. No. ____]; and the Court having considered the Ninth Interim Application and exhibits and other documents filed in support of the Ninth Interim Application; and the Court having found that the Ninth 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

¹ Capitalized terms utilized but not otherwise defined herein shall have the meaning ascribed to them in the Ninth Interim Application.

ORDERED that the Ninth Interim Application for the period covering July 1, 2019 through September 30, 2019 (the “Ninth Application Period”) is granted; and it is further

ORDERED that the Receiver’s compensation for the Ninth Application Period is allowed on an interim basis in the amount of \$44,337.20 (the “Allowed Receiver Fees”); and it is further

ORDERED that the fees requested by Otterbourg for the Ninth Application Period are allowed on an interim basis in the amount of \$1,038,220.95 (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 Ninth Application Period is allowed on an interim basis in the amount of \$938.27; and it is further

ORDERED that Otterbourg’s request for reimbursement of its out-of-pocket expenses for the Ninth Application Period is allowed on an interim basis in the amount of \$18,339.44; 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.