

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)

**ELEVENTH JOINT INTERIM APPLICATION OF THE RECEIVER
AND OTTERBOURG P.C. FOR ALLOWANCE OF COMPENSATION
AND REIMBURSEMENT OF EXPENSES INCURRED DURING THE PERIOD
JANUARY 1, 2020 THROUGH AND INCLUDING MARCH 31, 2020**

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 Eleventh Joint Interim Application (the “Eleventh Interim Application”) for Allowance of

Compensation and Reimbursement of Expenses Incurred During the Period from January 1, 2020 through and including March 31, 2020 (the “Eleventh 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 \$102,206.40 and reimbursement of expenses in the amount of \$1,366.19 for the Eleventh Application Period. Otterbourg requests interim approval of fees in the amount of \$1,213,020.30 and reimbursement of expenses in the amount of \$22,744.39 for the Eleventh Application Period, for a combined total of fees for Applicants in the amount of \$1,315,226.70,¹ and expenses in the amount of \$24,110.58 for the Eleventh Application Period.

This Eleventh Interim Application contains the following sections:

Section I provides a preliminary statement of the Receiver’s activities during the Eleventh 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

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 Eleventh Application Period, the Receiver’s recorded time charges before application of these accommodations were \$168,846.00 and Otterbourg’s recorded time charges were \$1,573,188.00, for a combined gross legal fees total (before the application of any accommodations) of \$1,742,034.00.

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

Section III contains a narrative description of the work Otterbourg professionals performed on behalf of the Receiver during the Eleventh 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 Applicants seek reimbursement and the procedures and policies adopted by Applicants 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 Eleventh Application Period, the primary focus of the Receiver and her team² was (i) the litigation commenced by the Receiver in the United States District Court for the Southern District of New York against various defendants seeking to avoid certain liens purportedly held by those defendants that would adversely impact potential distributions to investors and creditors as well as to recover 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 certain Accounting Firms (the "Arbitration"). In addition, during the Eleventh Application Period or in the intervening time prior to the submission of this Fee Application, settlements in were reached with respect to significant lien avoidance claims within the Beechwood Action (which is subject to final documentation) and the

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").

entire Arbitration. In addition, a settlement was reached resolving the litigation that the Receiver commenced to recover death benefits from a life insurance policy that was part of the ALS Life Settlement Portfolio.

Certain of the settlements that the Receiver reached, and is in the process of negotiating or expects to negotiate, are confidential. To preserve the confidentiality of these settlements, in this Eleventh Interim Application (as was done in the recently filed Status Report and in future Status Reports and fee applications), the Receiver will not disclose details of *any* settlements, including the identity of the settling parties, the amounts agreed to be paid by such parties, whether such amounts are to be paid in structured payouts or over what period of time, and/or the source of any litigation-related funds received in any interim application period, unless such details are matters of public record by virtue of a motion for Court approval of such settlement or otherwise.

A. Analysis and Disposition of Receivership Assets

During the Eleventh Application Period, the Platinum Receivership received approximately \$5.4 million. This amount is in addition to the approximately \$66.2 million received by the Platinum Receivership from the liquidation of various assets from the date of appointment of the Receiver. Certain parties have asserted a claim to all or part of the proceeds of such liquidated investments. None of these assets has been marketed or sold in a “fire sale” fashion.

The Receiver’s goal is to complete the monetization of the non-litigation assets by the third quarter of this year. There are certain assets in the portfolio that may ultimately have no realizable value. Many of the investments made by Platinum were investments in enterprises that were 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 seemingly 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. Even with such assumptions made by prior management regarding additional investment, the prior valuations generally were not supportable.

The Receiver's attorneys continue to prosecute the Greehey Action (discussed below). During the Eleventh Application Period, the Receiver settled the Lincoln/Rosenberg litigation with the life settlement insurance company over its refusal to pay the death benefit on the last remaining policy in the ALS portfolio of life insurance policies. Negotiations are in progress to resolve certain other litigations the Receiver commenced and/or has an interest in, and to dispose of certain other assets that also remain in the Platinum portfolio. The Receiver continues to evaluate the remaining assets in the portfolio to determine if any can be liquidated.

Certain parties have asserted an interest, including an alleged secured interest, in some or all of the proceeds of the sale of Receivership Estate assets. In the Beechwood Action, the Receiver has sought to void the purported blanket liens asserted on the Platinum assets and the underlying debt secured by the purported liens. The Receiver expects that those lien claims will be completely or significantly resolved by the aforementioned settlements reached with certain defendants in the Beechwood Action.

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

B. Administrative Matters

During the Eleventh 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”),³ the SEC and Platinum investors. The Receiver regularly updated 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.

The Receivership Team also filed and responded to other applications made before this Court and in other court proceedings involving Platinum. During the Eleventh 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,⁴ 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”).

³ 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.

⁴ Uri Landesman passed away in September 2018.

The SEC Complaint alleged, *inter alia*, that the Defendants conducted a fraudulent scheme to inflate asset values and illicitly moved investor money to cover losses and liquidity problems. This was an allegedly multi-pronged fraud perpetrated by Platinum Management (NY) LLC and Platinum Credit Management, L.P., the managers of PPVA and Platinum Credit Opportunities Master Fund L.P. (together with its feeder funds, “PPCO”), respectively, involving multiple individuals led by Nordlicht, the founder of the Platinum Entities and the Co-Chief Investment Officer of PPVA and PPCO. The SEC further alleged that Nordlicht and the managers of the Platinum Entities overstated the value of an oil company (Black Elk) that was among the funds’ largest assets, and that they concealed a growing liquidity crisis by transferring money between the funds, making redemptions to favored investors and using misrepresentations to attract new investors to the struggling funds.

In a parallel action, the U.S. Attorney’s Office for the Eastern District of New York brought criminal charges against Nordlicht and the individual Defendants. Following the criminal trial of Mark Nordlicht, David Levy and Joseph SanFilippo, the jury returned a verdict convicting Nordlicht and Levy of defrauding bondholders in portfolio company Black Elk Offshore Operations LLC, but acquitting each of them 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 Levy and ordered a new trial with respect to Nordlicht. The Department of Justice has appealed those decisions, and in the interim, two additional criminal trials have been delayed.

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, and determine whether one or more of the Receivership Entities should undertake bankruptcy filings.

B. Case Status⁵

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

(a) As of March 31, 2020, the Receivership Entities had approximately \$30 million in funds. Certain parties have claimed an interest in certain sold assets and 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 which, on their face, purport to grant them security interests in all or certain of Platinum's assets. These secured claims have been challenged and are subject to settlements, the exact scope of which is now being documented

It is estimated that, as of March 31, 2020, accrued and unpaid administrative expenses amount to approximately \$4.8 million. This amount includes the fees and expenses that the Receiver and Otterbourg are requesting in this Eleventh Interim Application and that Goldin is requesting in a separate application for the Eleventh Application Period, 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 Eleventh Application Period.

(b) Cash disbursements during the Interim Application Period totaled approximately \$5.9 million. This amount consisted primarily of (i) \$3,084,812 in disbursements to

⁵ The Receiver and Otterbourg base the information in this section primarily on the receivership's Standardized Fund Accounting Reports covering the period January 1, 2020 through March 31, 2020.

professionals; (ii) \$661,741 in business asset expenses (payroll and related expenses paid to Platinum employees, as well as office rent); and (iii) \$2,166,667 in additional litigation expenses.

Cash receipts during the Interim Application Period totaled \$5,395,000. This amount primarily consists of proceeds from prior and/or current settlements.

The Receiver believes that the Receivership is currently entering the final stages in which the remaining assets that can be monetized will be, the significant litigations have concluded or will be concluding, and the issues regarding the purported blanket liens resolved. The next stage for the receivership will be continued and heightened focus on formulating a plan of distribution of assets to creditors and investors, making final determinations regarding the commencement of any additional litigations and resolving any claim issues.

Pursuant to the previously-approved bar date procedures motion [Dkt. No. 453], 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. In total, 327 claims were filed prior to the applicable bar date. Some of these claims may be duplicate claims and some may be asserted against non-Receivership Entities. Parties holding investor claims, claims for unpaid redemptions and administrative claims were not required to file proofs of claim. The Receiver cannot at this time state what distributions will ultimately be to creditors and investors. Also, in addition to determining how to treat different claims (*e.g.*, unsecured creditor claims, unpaid redemption claims, insider claims, non-insider investor claims), the Receiver will need to determine if the various Platinum Entities will be fully or partially consolidated for claim and distribution purposes or if each will be treated separately. There may also be issues of Cayman law regarding the three Cayman funds that also may be implicated.

As of March 31, 2020, the primary assets of the Receivership Estate (“Receivership Property”) consisted of the following:

- (i) cash and cash equivalents of approximately \$30.5 million;
- (ii) remaining stock and royalty interests, litigation financing, loan receivables and other miscellaneous investments; and
- (iii) litigation claims.

(c) In addition to the asset specific lawsuits – including, the Lincoln/Rosenberg (now settled) and Greehey Litigations – PPCO’s interest in the lawsuit relating to Agera Energy and PPCO’s and PPLO’s interest in certain other litigation commenced pre-petition that continue to be pending, the Receiver’s investigation of pre-petition activities has to date resulted in the commencement of two targeted litigations: (i) the Arbitration and (ii) the Beechwood Action. Other than the Beechwood Action and the Arbitration, which the Receiver has now settled, the Receiver cannot predict the outcome of any litigations she commenced or in which the Receivership has an interest or the timing of collecting on any judgment or settlement that may ultimately be obtained. As set forth above, to preserve the confidentiality of certain settlements that the Receiver has reached, and is in the process of negotiating or expects to negotiate, the Receiver will not disclose details of any settlements, including the identity of the settling parties, amounts agreed to be paid by such parties, whether such amounts are to be paid in structured payouts and over what period of time, and the source of any litigation-related funds received in any interim application period, unless such details are matters of public record by virtue of a motion for Court approval of such settlement or otherwise.

The Receivership Team is concluding its review and analysis of 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, on a cost-benefit basis, warrant the commencement of litigation. For any claims in which a statute of limitations may be approaching, the Receiver has reached out, and will continue to reach out, to the potential targets to enter into tolling agreements to allow the Receivership Team the appropriate time to investigate potential claims, reach agreements prior to commencing any litigation, and, if necessary, commence action(s) against those targets that have declined to toll the statute of limitations. The Receiver will be making final determinations in the coming months whether any additional actions will be commenced.

III. FEES AND EXPENSES REQUESTED

In connection with the Eleventh Application Period, the Receiver requests interim approval of her fees in the amount of \$102,206.40 and reimbursement of expenses in the amount of \$1,366.19. Otterbourg requests interim approval of fees in the amount of \$1,213,020.30 and reimbursement of expenses in the amount of \$22,744.39. Thus, the combined total of fees for Applicants of \$1,315,226.70, plus expenses of \$24,110.58, is \$1,339,337.28.

The Receiver has assembled a team of Otterbourg professionals to prosecute the litigations commenced by the Receiver and 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 \$168,846.00 to \$102,206.40, a reduction in the amount of \$66,639.60. Moreover, the recorded time charges for the Otterbourg professionals have been reduced from \$1,573,188.00 to \$1,213,020.30, a reduction in the amount of \$360,167.70. Therefore, the total reduction for legal fees incurred during the Eleventh Application Period by the Receiver and Otterbourg professionals is \$426,807.30.

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 detail for the Eleventh Interim Application to SEC counsel on May 6, 2020 to allow for a thirty-day review period.

This Eleventh Interim Application includes certain exhibits:

(a) The SFAR for the period of January 1, 2020 through March 31, 2020 is attached as **Exhibit A** hereto.

(b) A Fee Schedule showing the total fees billed and hours worked during the Eleventh 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 Eleventh 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 Eleventh 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 eleventh 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 Eleventh Interim Application to SEC counsel prior to filing the Application with the Court, and SEC counsel has reviewed such time records and fee and expenses being requested pursuant to this 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 one paraprofessional billed time during the Eleventh Application Period (in addition to the Receiver).⁶ 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

⁶ The Receiver has voluntarily not billed the time of any professional that billed less than fifteen (15) hours to the case during the Eleventh Application Period.

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 Eleventh Application Period and their specific roles were as follows:

(a) Adam C. Silverstein (Partner) (8.4 Hours to P01; 5.4 Hours to P02; 56.2 Hours to P04; 42.3 Hours to P14; 45.7 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 Eleventh Application Period was dedicated to matters relating to the Arbitration, including matters relating to the settlement. Mr. Silverstein also assisted with certain issues relating to the Beechwood Action and proposed settlements. During the Eleventh Application Period, Mr. Silverstein also spent time responding to the Court’s Minute Order in response to certain Defendants’ request for advancement of fees and whether the Platinum Estate should be in bankruptcy (discussed below). Mr. Silverstein has also been one of the point persons regarding communications with the SEC.

(b) William Moran (Partner) (.5 Hours to P02; 6.1 Hours to P04; 1.4 Hours to P10; 386.3 Hours to P14; .5 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 Eleventh Application Period including responding to requests for admissions, responding to motions for summary judgment and assisting the Receiver in analyzing settlements proposals and preparing documents in connection with the settlement with at least one of the defendants.

(c) Philip Berg (Partner) (5.5 Hours to P01; 20.7 Hours to P02) – Mr. Berg is a partner in the firm’s corporate department and specializes in negotiation and documentation of asset sales and other transactions. During the Eleventh Application Period, Mr. Berg was primarily involved with the sale of the Cokal royalty, including preparing a non-disclosure agreement, reviewing the necessary documents and preparing and negotiating the asset purchase agreement and corresponding acknowledgment agreement.

(d) Jennifer S. Feeney (Of Counsel) (5.4 Hours to P01; 7.7 Hours to P02; 21.8 Hours to P04; .4 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 Eleventh Application Period, Ms. Feeney attended to 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, reviewed 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) (20.6 Hours to P01; 2.9 Hours to P02; 22.5 Hours to P04; 4.7 Hours to P10; 452.6 Hours to P14) – Mr. Weinick is a senior litigator and is also a member of Otterbourg’s bankruptcy department. He has served as the Receiver’s “hub and spoke,” coordinating 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 Eleventh Application Period in connection with responding to motions for summary judgment, preparing for oral argument, conducting remaining depositions and attending to all other matters in the Beechwood Action, including issues relating to settlements.

(f) Andrew S. Halpern (Associate) (49.6 Hours to P04; 2.6 Hours to P10; 417.9 Hours to P14; 27.6 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 analyzing potential additional actions, the relevant statutes of limitation and extending tolling agreements when necessary. Mr. Halpern spent significant time in connection with responding to motions for summary judgment in the Beechwood Action and analyzing for the Receiver issues relevant to settlement discussions. He also had extensive communications with experts and consultants in the Beechwood Action.

(g) Gabriela S. Leon (Associate) (1.7 Hours to P02; 4.8 Hours to P10; 354.5 Hours to P14; 9.6 Hours to P15) – Ms. Leon is a junior associate in the litigation department. Ms. Leon assisted with both the Arbitration and the Beechwood Action. During the Eleventh Application Period, in the Beechwood Action, Ms. Leon assisted with responding to requests for admissions, responding to supplemental documents requests, reviewing transcripts and researching issues for the response to motions for summary judgment. Ms. Leon also assisted with research related to statutes of limitation, all at a considerably lower billing rate.

(h) Alessandra Dagirmanjian (Associate) (15.3 Hours to P01; 2.6 Hours to P14) – Ms. Dagirmanjian is a first-year associate in the litigation department. Ms. Dagirmanjian

assisted with certain research issues in connection with the Greehey action and the Beechwood Action, at a considerably lower billing rate.

(i) Jessica Hildebrandt (Paralegal) (17.0 Hours to P01; 11.8 Hours to P04; .8 Hours to P10; 276.0 Hours to P14; .3 Hours to P15) – Ms. Hildebrandt is a paralegal and has assisted the Otterbourg attorneys with certain document review, including review of transcripts (which are suitable for a paralegal at a lower billable rate), and helped prepare the Otterbourg attorneys for various hearings, depositions and court filings.

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

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

**A. Asset Analysis and Recovery (P01) - Total Fees: \$55,218.00
Asset Disposition (P02)⁸ - Total Fees: \$37,426.00**

During the Eleventh 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, other investors in the underlying asset, including counsel to PPVA. Also included in the time billed during the Eleventh 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.

⁷ 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.

⁸ 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.

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 team meetings with 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. Goldin also prepared regular updates on the status of the remaining assets in the Platinum portfolio and current disposition options, which Applicants reviewed.

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

1. **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 jointly owned by PPVA and 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").⁹ 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

⁹ 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.

“Agera Action”). The Case is No. 2019-0431. Thereafter, the case was removed to the United States District Court for the District of Delaware (the “Delaware District Court”) (Case No. 19-cv-01319) and the plaintiffs filed a motion for remand. In early April, the Delaware District Court granted Plaintiffs’ motion to remand the action to the Delaware Chancery Court.

In addition, in connection with the Agera litigation, a settlement was reached by and among PPVA, the Joint Official Liquidators of PPVA, PGS, Michael Nordlicht, Kevin Cassidy and two “Starfish” entities. While PPCO is not a party to the agreement, it acknowledged and agreed to its terms because of PPCO’s membership interest in PGS. The agreement provides for a settlement payment to PPVA/ PGS. While PPCO will not receive cash from the settlement with Cassidy and Starfish, its share of the funding amount that must be repaid from any settlement proceeds before PGS can share in any recovery was reduced.

During the Eleventh Application Period, Applicants communicated with counsel for PGS and PPVA regarding these matters and reviewed pleadings and agreements when appropriate. Otterbourg attorneys who have billed time to this matter include attorneys with litigation experience.

2. **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 or her predecessor. The Receiver asserted 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 (the “Rosenberg Litigation”). 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 Eleventh Application Period, the Receiver and the other parties to the Rosenberg Litigation engaged in settlement discussions, which resulted in the execution of a Settlement Agreement. The terms of the settlement will not be disclosed.

During the Eleventh Application Period, Applicants worked with counsel of record in charge of the matter. Applicants reviewed and revised the settlement agreement and communicates with the minority shareholders of ALS. 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.

3. **Cokal Limited** (ASX: “CKA”) – refers to a coal mining company headquartered in Sydney, NSW. CKA’s active mining project is on the island of Borneo in the Bumi Barito Mineral (“BBM”) of Indonesia. PPCO originally held common stock, warrants, and a Note in CKA (PPVA also owned common stock, options, and a Note). As a result of a debt restructuring transaction agreed to by prior management, the Note was restructured into new options and a royalty from revenues of BBM. During the first quarter of 2019, PPCO sold its entire stock and options position in CKA to one of CKA’s current shareholders. At the time, the shareholder expressed interested in potentially purchasing PPCO’s royalty interest, but such discussions went dormant until the end of last year. The Receivership team re-engaged with the shareholder and during the Eleventh Application Period, entered into an agreement for the sale of PPCO’s royalty interest. Pursuant to the sale agreement, a good faith deposit on the sale was wired to Otterbourg’s escrow account on March 27, 2020, and the closing on the sale is to be completed

within ninety (90) days from receipt of such deposit, at which point the escrowed funds will be released from escrow to PPCO and the purchaser will pay the remaining portion of the purchase price to PPCO.

During the Eleventh Application Period, Applicants prepared a non-disclosure agreement with the purchaser, reviewed the underlying documents and prepared the asset purchase agreement and acknowledgment for the sale of the royalty. This matter was handled by an Otterbourg attorney with transactional experience.

4. **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 (the “Greehey Litigation”) seeking entry of a judgment holding Defendants in default on an immediate payment obligation to Bakken, in addition to associated interest, costs and expenses, including reasonable attorneys’ fees and costs. The Receiver has amended her complaint and responded to the Defendants revised counter-claims. Discovery continued during the Eleventh Application Period.

During the Eleventh Application Period, Applicants discussed strategy with Platinum’s General Counsel, who is primarily responsible for the Greehey Litigation, and assisted with research and document production issues. Otterbourg attorneys who have billed time to this matter include attorneys with experience in litigation.

B. Case Administration (P04) - Total Fees: \$156,540.50

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 tasks recorded under this category include the following:

1. **Investor Communications.** During the Eleventh 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. Applicants also prepared the Tenth Status Report of the Receiver during the Eleventh Application Period.

2. **Response to Requests for Advancement of Fees.** Following the conclusion of the criminal trial, certain Defendants renewed their requests for the advancement and/or indemnification of attorneys' fees. Toward the conclusion of the fourth quarter of 2019, by minute order entered December 12, 2019 (the "Minute Order"), the Court requested additional briefing and argument on the "sole issue [of] whether it would be appropriate for this Court to dismiss the case without prejudice to the right of the Receiver or creditors to file a bankruptcy petition against the company in light of the fact that this Court has been called upon to apply Bankruptcy Code concepts to substantial claims and procedures in this matter." In response to the Minute Order, Applicants prepared and filed on January 17, 2020 a Declaration and

Memorandum of Law in Response to the Minute Order Entered December 12, 2019 (collectively, the “Receiver’s Response to Minute Order”) [Dkt. No. 516]. On January 22, 2020, the Court issued an Order on the docket, pursuant to which the Court found, *inter alia*, that (i) compelling the Receiver to file a bankruptcy petition at this point would not be in the best interest of all parties and (ii) that while both SanFilippo and Levy are entitled to indemnification, their claims are non-priority claims among many that must wait for any payment *pari passu* with other non-priority claimants.

3. **Schafer & Weiner**. On September 25, 2018, the Court issued its Memorandum Decision and Order denying the fee application of Schafer & Weiner (“S&W”) and reserving judgment on the Receiver’s cross-motion seeking disgorgement of the pre-Receivership fees paid to S&W. [Dkt. No. 383] S&W then appealed that decision to the U.S. Court of Appeals for the Second Circuit. While the appeal was pending, S&W and the Receiver participated in the Second Circuit’s mandatory mediation conference (CAMP) and simultaneously engaged in conversations with S&W and the SEC regarding a possible resolution of the appeal and the Receiver’s cross-motion to disgorge fees. The CAMP process did not directly lead to a resolution of issues with S&W. The parties, however, continued to engage in discussions and during the Eleventh Application Period, the parties agreed to and executed a written Settlement Agreement on January 16, 2020 (the “S&W Settlement”) that was presented to the Court on February 6, 2020 [Dkt. No. 520] and approved on February 24, 2020 [Dkt. No. 525]. The Receivership received the first payment and agreed to a delay in the second payment in view of circumstances caused by COVID-19.

Time was spent by Applicants during the Eleventh Application Period in connection with the negotiation of the preparation of the settlement agreement and motion to the Court.

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

5. **PPVA.** The Receiver and the Receivership Team had periodic teleconferences and in-person meetings with the Joint Liquidators for the PPVA Master Fund and the PPVA Feeder Fund and/or their staff to discuss issues of mutual interest, including jointly held assets, the Beechwood Action, a related Chapter 15 bankruptcy proceeding, the Agera Action (discussed below) and additional claims that may be jointly held.

6. **Receiver Oversight.** Time during the Eleventh 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: \$9,549.50

The Receiver is nearing the conclusion of her review on whether additional causes of action against other parties should be asserted. The analysis includes transfers from Platinum, the value of the assets transferred, and the consideration given in return for the transferred assets.

The Receiver has entered into tolling agreements with certain third parties. Final decisions will be made in the near term as to whether to commence, or to settle out of court, any additional claims.

During the Eleventh Application Period, the Receiver engaged in discussions with the Executor of the estate of Uri Landesman (the "Landesman Estate"), a former Platinum officer, who, prior to his passing, had been a defendant in the criminal and civil action commenced by the SEC. The discussions included the SEC and the joint liquidators for the PPVA Funds. In cooperation with the SEC and the Joint Liquidators, the Receiver agreed to settle all claims against the Landesman Estate. PPVA and the SEC agreed to settle its claims against the Landesman Estate as well. During the Eleventh Application Period, Applicants spent time reviewing and addressing issues relevant to the settlement with the Landesman Estate.

D. Beechwood Action (P14) – Total Fees: \$1,384,636.50

On December 19, 2018, the Receiver commenced the Beechwood Action in the Southern District of New York against (i) certain so-called Beechwood entities, (ii) Senior Health Insurance Company of Pennsylvania, (iii) Fuzion Analytics, Inc., (iv) CNO Financial Group, Inc., (v) Bankers Consec Life Insurance Company, (vi) Washington National Insurance Company and (vii) 40|86 Advisors, Inc. The case is captioned "*Melanie L. Cyganowski, as Equity Receiver for Platinum Partners Credit Opportunities Master Fund LP, et al. v. Beechwood RE Ltd., et al.*" and is pending as Case 1:18-cv-12018 in the United States District Court for the Southern District of New York. The Receiver exercised her right under the applicable rules and orders of the Court to amend the original filed complaint, and on March 29, 2019, the Receiver filed an amended complaint. A copy of the redacted amended complaint filed in the Beechwood Action may be accessed on the Receiver's website

(www.PlatinumReceivership.com), and summaries of developments in the Beechwood Action may be found in the Receiver's prior Status Reports.

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. On October 7, 2019, Judge Rakoff issued an Opinion and Order, which, while dismissing many of the Receiver's causes of action for monetary damages, sustained her causes of action to set aside the liens currently preventing a distribution of estate assets, as well as the Receiver's causes of action for aiding and abetting breach of fiduciary duty, and unjust enrichment against certain of the defendants. During the Interim Application Period, the Receiver filed a motion for partial summary judgment against one of the defendants, and responded to motions for summary judgment filed by the defendants in the Beechwood Action. The Receiver's professionals also prepared to present oral argument on these motions on April 7, 2020, although, due to the settlements in principle discussed above and below, which were reached on the eve of argument, argument was only heard by the Court on the one motion not covered by those settlements.

Parallel to the litigation track, the Receiver and the Receiver's counsel also engaged in ongoing settlement discussions with certain defendants asserting liens, as principal and/or agent, on all of the Receiver's assets. Together, there were three groups of defendants and the Receiver has now reached settlements with each group of defendants asserting such liens, although the exact scope of such settlements, which are in the process of being documented, will depend, in part, on the ability of defendants holding liens as agent to compromise such liens. As a result of the settlements, at the request of the parties, the District Court held the majority of the summary judgment motions in abeyance, and only heard argument on the summary judgment motion filed by a defendant that had not asserted liens against the estate. By Memorandum and Opinion

dated April 15, 2020, the Court granted that defendant's motion for summary judgment and the Receiver is now considering her options relating thereto, including appeal.

The Receiver expects to completely document and execute settlement agreements resolving all or a significant portion of the Beechwood Action during the current quarter, and will report on such settlements, to the extent allowed, in the next status report. The Receiver also will continue to update her website, www.PlatinumReceivership.com/index, with any developments in the case.

During the Eleventh Application Period, Applicants spent time responding to requests for admissions propounded by one of the defendants and completing discovery, including final depositions. Applicants also prepared responses to multiple motions for summary judgment, prepared for and attended oral argument on the motions for summary judgment. Applicants also participated in numerous discussions and meetings with various defendants regarding potential settlements of the claims, which included a thorough analysis of settlement options and an analysis of the liens asserted by the defendants. Applicants also spent time drafting and revising the settlement agreement with one of the defendants.

E. Arbitration (P15) – Total Fees \$92,088.50

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. In the Arbitration, the Receiver claimed 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 sought monetary

damages in an amount to be determined by the arbitration panel. The Arbitration was before a tribunal of three neutral arbitrators. On June 25, 2019, the Accounting Firms submitted a motion for summary judgment dismissing all of the Receiver's claims. The motion was fully briefed and oral argument was held on the motion on November 21, 2019.

During the Eleventh Application Period, the Receiver and the Accounting Firms reached a settlement resolving the Arbitration in its entirety. Consistent with the rules of the arbitral forum in which the Arbitration was contractually required to be brought, the terms of the parties' settlement are, and must remain, confidential. By letter to the Court, dated February 28, 2020, filed on the docket that day [Dkt. No. 526], the Receiver notified the Court and all interested parties of the Receiver's intention to consummate the settlement with the Accounting Firms confidentially and without further order of the Court, in accordance with the powers vested in her by the Receiver Order, unless the Court were to express disagreement with the Receiver's approach within ten days after the filing of such letter. The Receiver received no objection to the approach described in her letter from the Court or any interested party. Accordingly, the Receiver consummated the settlement during the Eleventh Application Period. Because of the aforementioned confidentiality restrictions, no further information regarding the Arbitration can be provided.

During the Eleventh Application Period, time was spent by the attorney working on the case to issues relevant to the negotiations and settlement of the Arbitration.

V. EXPLANATION OF EXPENSES AND RELATED POLICIES

Applicants seek reimbursement of its out-of-pocket costs in the amount of \$24,110.58. **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 Eleventh 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 29,856 internal laser copies and photocopies during the Eleventh Application Period at the rate of 0.15 cents per page, totaling \$4,478.40 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 Eleventh 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. Applicants incurred travel and transportation expenses during the Eleventh Application Period in connection with the Receiver's travel to Texas to discuss settlement with the representatives for one of the defendants.

(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 and warranted. 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.

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 Eleventh 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 Tenth Interim Fee Application if the requested fees are approved is \$110,908.70 (\$20,441.28 for the Receiver and \$90,467.42 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 \$102,206.40 (the "Allowed Receiver Fees");

(b) Grant interim approval of Otterbourg’s compensation in the amount of \$1,213,020.30 (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 \$1,366.19;

(d) grant interim approval of Otterbourg’s request for reimbursement of its out-of-pocket expenses in the amount of \$22,744.39;

(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: May 8, 2020

Otterbourg P.C.

By: /s/ Adam C. Silverstein

Adam C. Silverstein

Jennifer S. Feeney

Erik B. Weinick

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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 1/1/2020 to 3/31/2020

FUND ACCOUNTING (See Instructions)		Period from 1/1/2020 to 3/31/2020		
		PPCO	PPLO	Total
	Beginning Balance (As of 1/1/2020)	\$ 27,264,534	\$ 3,353,717	\$ 30,618,251
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income	-	-	-
Line 3	Cash and Securities	-	-	-
Line 4	Interest/Dividend Income	-	-	-
Lines 5, 6, 7	Asset Liquidations and Third-Party Litigations Income	5,395,000	-	5,395,000
Line 8	Miscellaneous - Other	-	-	-
	Total Funds Available (Lines 1-8)	\$ 32,659,534	\$ 3,353,717	\$ 36,013,251
	<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	(3,084,812)	-	(3,084,812)
Line 10b	Business Asset Expenses	(661,741)	-	(661,741)
Line 10c	Personal Asset Expenses	-	-	-
Line 10d	Investment Expenses	-	-	-
Line 10e	Third-Party Litigation Expenses	-	-	-
	1. Attorney Fees	(2,166,667)	-	(2,166,667)
	2. Litigation Expenses	-	-	-
	Total Third-Party Litigation Expenses	(2,166,667)	-	(2,166,667)
Line 10f	Tax Administrator Fees and Bonds	-	-	-
Line 10g	Federal and State Tax Payments	(2,400)	-	(2,400)
	Total Disbursements for Receivership Operations	\$ (5,915,619)	\$ -	\$ (5,915,619)
Line 11	Disbursements for Distribution Expenses Paid by the Fund	-	-	-
Line 12	Disbursements to Court/Other	-	-	-
	Total Funds Disbursed	\$ (5,915,619)	\$ -	\$ (5,915,619)
Line 13	Ending Balance (As of 3/31/2020)	\$ 26,743,915	\$ 3,353,717	\$ 30,097,631

EXHIBIT B

Fee Schedule by Professional

**SUMMARY OF HOURS BILLED BY PROFESSIONALS AND PARAPROFESSIONALS
FOR THE STATEMENT PERIOD OF
JANUARY 1, 2020 THROUGH MARCH 31, 2020**

Professional	Year Admitted	Rate Per Hour	No. of Hrs.	Total Compensation¹
Melanie L. Cyganowski ("MLC") Partner	1982	\$1315.00 ²	128.4	\$168,846.00
Adam C. Silverstein ("ACS") Partner	1992	\$910.00	158.0	\$143,780.00
William M. Moran ("WMM") Partner	1990	\$895.00	394.8	\$353,346.00
Philip C. Berg ("PCB") Partner	1992	\$885.00	26.2	\$23,187.00
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$850.00	35.3	\$30,005.00
Erik B. Weinick ("EBW") Of Counsel	2002	\$805.00	503.3	\$405,156.50
Andrew S. Halpern ("ASH") Associate	1986	\$775.00	497.7	\$385,717.50
Gabriela S. Leon ("GSL") Associate	2019	\$360.00	370.6	\$133,416.00
Alessandra M. Dagirmanjian ("AMD") Associate	2020	\$295.00	17.9	\$5,280.50
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$305.00	305.9	\$93,299.50
	TOTAL		2438.1	\$1,742,034.00

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	9.0	\$11,835.00	\$2,880.00	\$1,791.00	\$4,671.00	\$7,164.00
P02	Asset Disposition	3.7	\$4,865.50	\$1,184.00	\$736.30	\$1,920.30	\$2,945.20
P04	Case Administration	15.7	\$20,645.50	\$5,024.00	\$3,124.30	\$8,148.30	\$12,497.20
P10	Forensics	0.4	\$526.00	\$128.00	\$79.60	\$207.60	\$318.40
P13	Travel	5.0	\$6,575.00	\$1,600.00	\$995.00	\$2,595.00	\$3,980.00
P14	Beechwood Litigation	75.5	\$99,282.50	\$24,160.00	\$15,024.50	\$39,184.50	\$60,098.00
P15	Arbitration	19.1	\$25,116.50	\$6,112.00	\$3,800.90	\$9,912.90	\$15,203.60
	TOTALS:	128.4	\$168,846.00	\$41,088.00	\$25,551.60	\$66,639.60	\$102,206.40

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	72.20	\$43,383.00	\$4,338.30	\$39,044.70
P02	Asset Disposition	37.2	\$32,560.50	\$3,256.05	\$29,304.45
P04	Case Administration	169.7	\$135,895.00	\$13,589.50	\$122,305.50
P10	Forensics	14.3	\$9,023.5	\$902.35	\$8,121.15
P14	Beechwood Litigation	1932.60	\$1,285,354.00	\$321,338.50	\$964,015.50
P15	Arbitration	83.70	\$66,972.00	\$16,743.00	\$50,229.00
	TOTALS:	2,309.7	\$1,573,188.00	\$360,167.70	\$1,213,020.30

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	\$1,315.00	9.0	\$11,835.00
Adam C. Silverstein ("ACS") Partner	1992	\$910.00	8.4	\$7,644.00
Philip C. Berg ("PCB") Partner	1992	\$885.00	5.5	\$4,867.50
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$850.00	5.4	\$4,590.00
Erik B. Weinick ("EBW") Of Counsel	2002	\$805.00	20.6	\$16,583.00
Alessandra M. Dagirmanjian ("AMD")	2020	\$295.00	15.3	\$4,513.50
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$305.00	17.0	\$5,185.00
	TOTAL		81.2	\$55,218.00

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	\$1,315.00	3.7	\$4,865.50
Adam C. Silverstein ("ACS") Partner	1992	\$910.00	5.4	\$4,914.00
William M. Moran ("WMM") Partner	1990	\$895.00	.5	\$447.50
Philip C. Berg ("PCB") Partner	1992	\$885.00	20.7	\$18,319.50
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$850.00	7.7	\$6,545.00
Erik B. Weinick ("EBW") Of Counsel	2002	\$805.00	2.9	\$2,334.50
	TOTAL		40.9	\$37,426.00

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	\$1,315.00	15.7	\$20,645.50
Adam C. Silverstein ("ACS") Partner	1992	\$910.00	56.2	\$51,142.00
William M. Moran ("WMM") Partner	1990	\$895.00	6.1	\$5,459.50
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$850.00	21.8	\$18,530.00
Erik B. Weinick ("EBW") Of Counsel	2002	\$805.00	22.5	\$18,112.50
Andrew S. Halpern ("ASH") Associate	1986	\$775.00	49.6	\$38,440.00
Gabriela S. Leon ("GSL") Associate	2019	\$360.00	1.7	\$612.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$305.00	11.8	3599.00
	TOTAL		185.4	\$156,540.50

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
Melanie L. Cyganowski ("MLC") Partner	1982	\$1,315.00	.4	\$526.00
William M. Moran ("WMM") Partner	1990	\$895.00	1.4	\$1,253.00
Erik B. Weinick ("EBW") Of Counsel	2002	\$805.00	4.7	\$3,783.50
Andrew S. Halpern ("ASH") Associate	1986	\$775.00	2.6	\$2,015.00
Gabriela S. Leon ("GSL") Associate	2019	\$360.00	4.8	\$1,728.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$305.00	.8	\$244.00
	TOTAL		14.7	\$9,549.50

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
Melanie L. Cyganowski ("MLC") Partner	1982	\$1,315.00	5.0	\$6,575.00
	TOTAL		5.0	\$6,575.00

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	\$1,315.00	75.5	\$99,282.50
Adam C. Silverstein ("ACS") Partner	1992	\$910.00	42.3	38,493.00
William M. Moran ("WMM") Partner	1990	\$895.00	386.3	\$345,738.50
Jennifer S. Feeney ("JSF") Of Counsel	1998	\$850.00	.4	\$340.00
Erik B. Weinick ("EBW") Of Counsel	2002	\$805.00	452.6	\$364,343.00
Andrew S. Halpern ("ASH") Associate	1986	\$775.00	417.9	\$323,872.50
Gabriela S. Leon ("GSL") Associate	2019	\$360.00	354.5	\$127,620.00
Alessandra M. Dagirmanjian ("AMD")	2020	\$295.00	2.6	\$767.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$305.00	276.0	\$84,180.00
	TOTAL		2008.1	\$1,384,636.50

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	\$1,315.00	19.1	\$25,116.50
Adam C. Silverstein ("ACS") Partner	1992	\$910.00	45.7	\$41,587.00
William M. Moran ("WMM") Partner	1990	\$895.00	.5	\$447.50
Andrew S. Halpern ("ASH") Associate	1986	\$775.00	27.6	\$21,390.00
Gabriela S. Leon ("GSL") Associate	2019	\$360.00	9.6	\$3,456.00
Jessica K. Hildebrandt ("JKH") Paralegal	N/A	\$305.00	.3	\$91.50
	TOTAL		102.8	\$92,088.50

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

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

May 5, 2020
BILL NO. 209786

For Services Rendered Through March 31, 2020:

<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>
MLC	01/10/20	Conference(s) in Office Team meeting with Otterbourg and Goldin (MLC portion)	2.20	2,893.00
MLC	01/29/20	Review/analyze Review of draft correspondence outlining outstanding issues for ALS litigation	.90	1,183.50
MLC	01/31/20	Conference(s) in Office Meeting with Otterbourg and Goldin teams to review pending matters (MLC Portion)	1.50	1,972.50
MLC	02/12/20	Analysis of Memorandum Review and analysis of financial memorandum prepared by Goldin concerning Receivership assets	.80	1,052.00
MLC	02/19/20	Conference(s) in Office Team meeting reviewing status of various litigations and dispositions (MLC Portion)	1.80	2,367.00

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

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/06/20 MLC	Conference call(s) Meeting with Goldin and Otterbourg concerning status of ongoing dispositions and litigations (MLC Portion)	.30	394.50
03/17/20 MLC	Analysis of Memorandum Review of ALS/Lincoln Life settlement payment terms	.80	1,052.00
03/27/20 MLC	Conference call(s) Team meeting re status of various matters and next steps (MLC Portion)	.70	920.50
TOTAL PHASE P01		9.00	\$11,835.00

Phase: P02 Asset Disposition

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/27/20 MLC	Telephone Call(s) Telcon with counsel for buyer re Abdala	.40	526.00
02/17/20 MLC	Correspondence Correspondence with counsel for Buyer re potential settlement involving Abdala	.40	526.00
02/17/20 MLC	Analysis of Memorandum Correspondence with Goldin re possible disposition of Cokal	.80	1,052.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/18/20 MLC	Correspondence Email to Buyer's counsel responding to settlement proposal	.50	657.50
03/11/20 MLC	Analysis of Memorandum Review and analysis of dispute issues arising in connection with LC Energy Lease settlement agreement	.80	1,052.00
03/27/20 MLC	Analysis of Memorandum Review and analysis of Cokal asset Purchase Agreement (Wintercrest Advisors; Northrock Financial)	.80	1,052.00
TOTAL PHASE P02		3.70	\$4,865.50

Phase: P04

Case Administration

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/07/20 MLC	Telephone Call(s) Telcon with James Wells of the California Franchise Board of Taxation	.40	526.00
01/09/20 MLC	Review/analyze Review of Goldin financial analysis of receivership	.80	1,052.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/09/20 MLC	Review/analyze Reviewed outline of response to Judge Cogan directive re: bankruptcy issues	1.50	1,972.50
01/13/20 MLC	Review of Documents Review of financial analysis prepared by Goldin	.90	1,183.50
01/16/20 MLC	Review/analyze Review of MOL in response to court minute order	1.10	1,446.50
01/17/20 MLC	Review/analyze Final review and revision to MLC declaration in response to court request	1.50	1,972.50
01/17/20 MLC	Review/analyze Final review of MOL in response to court request	1.20	1,578.00
01/17/20 MLC	Review/analyze Review of response filed by SEC	.50	657.50
01/17/20 MLC	Review/analyze Review of response to court order filed by defendants	.30	394.50
01/17/20 MLC	Review/analyze Review of response to court order filed by PPVA	.20	263.00

OTTERBOURG P.C.
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/21/20 MLC	Draft/revise Reviewed and revised draft of Receiver's status report	1.30	1,709.50
01/27/20 MLC	Telephone Call(s) Telcon with Allan Diamond re PPVA proposed settlement in a confidential litigation	.50	657.50
01/27/20 MLC	Correspondence Review of Court's minute Order and correspondence to team re same	.80	1,052.00
01/30/20 MLC	Review Documents Admin: Payment of various outstanding bills of Receivership and Current Cash Report	.70	920.50
02/05/20 MLC	Conference(s) in Office Meeting with Trey Rogers re change of token and financial payment process	.60	789.00
02/20/20 MLC	Review/analyze Reviewed financials and paid certain monthly expenses	.50	657.50
02/21/20 MLC	Telephone Call(s) Telcon with court staff concerning receivership dispositions	.30	394.50

OTTERBOURG P.C.
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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/11/20 MLC	Analysis of Memorandum Attention to financial analysis prepared by Goldin and payment of certain bills	1.10	1,446.50
03/13/20 MLC	Analysis of Memorandum Review of certain financial reports prepared by Goldin	.60	789.00
03/19/20 MLC	Correspondence Correspondence with counsel for PPVA re settlement and request for release from PPCO	.50	657.50
03/27/20 MLC	Review File Review of financial reports from Goldin and CFO	.40	526.00
TOTAL PHASE P04		15.70	\$20,645.50

Phase: P10 Forensic Accounting

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/27/20 MLC	Analysis of Memorandum Review of Tolling Agreement Extension	.40	526.00
TOTAL PHASE P10		.40	\$526.00

Phase: P13 Travel

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/06/20	MLC	Non-Working Travel Travel to Austin to meet with SHIP Receiver (billed at half time)	2.50	3,287.50
02/07/20	MLC	Non-Working Travel Return travel to NYC from Austin (billed at half time)	2.50	3,287.50
TOTAL PHASE P13			5.00	\$6,575.00

Phase: P14

BEECHWOOD LITIGATION

<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/06/20	MLC	Correspondence Beechwood - correspondence re: upcoming settlement meeting with SHIP receiver in Beechwood litigation	.60	789.00
01/07/20	MLC	Conference(s) in Office Beechwood - conference with Beechwood team in preparation for settlement conference with SHIP Receiver	.70	920.50
01/08/20	MLC	Preparation of Settlement Beechwood - preparation for settlement conference with SHIP receiver	.80	1,052.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/08/20	MLC	Preparation of Settlement Beechwood - Reviewed settlement options in Beechwood litigation	.60	789.00
01/08/20	MLC	Conference call(s) Beechwood - settlement conference with SHIP receiver	.50	657.50
01/10/20	MLC	Conference(s) in Office Beechwood - meeting with Goldin re: certain litigation issues in Beechwood	.60	789.00
01/17/20	MLC	Conference(s) in Office Beechwood - conference with counsel re: mediation	1.00	1,315.00
01/27/20	MLC	Draft/revise Reviewed and revised draft of letter to SHP receiver re possible settlement	1.30	1,709.50
01/29/20	MLC	Correspondence Beechwood - correspondence re settlement meeting with SHIP receiver	.60	789.00
01/30/20	MLC	Preparation of Settlement Beechwood - prepared for settlement meeting with SHIP receiver	2.00	2,630.00
01/31/20	MLC	Conference(s) in Office Meeting with Goldin re litigation support (MLC Portion)	.50	657.50

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/31/20	MLC	Preparation of Settlement Beechwood - prepared for meeting with SHIP receiver	.60	789.00
02/04/20	MLC	Prepare for Meeting Prepared for mediation discussion with SHIP receiver in Austin	2.20	2,893.00
02/05/20	MLC	Draft/revise Reviewed and revised letter to SHIP Receiver in anticipation of mediation discussion	2.40	3,156.00
02/05/20	MLC	Prepare for Meeting Continued to prepare for mediation session with SHIP Receiver	1.90	2,498.50
02/06/20	MLC	Prepare for Meeting Prepared for meeting with SHIP Receiver	1.50	1,972.50
02/07/20	MLC	Conference Out of Office Meeting with SHIP Receiver at his office in Austin to discuss possible settlement	3.00	3,945.00
02/07/20	MLC	Telephone Call(s) Telcon with EBW re potential settlement with SHIP	.50	657.50
02/07/20	MLC	Telephone Call(s) Telcon with Neal Jacobson concerning items of common interest	.30	394.50

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/07/20	MLC	Draft/revise Draft outline of potential settlement with SHIP Receiver	.90	1,183.50
02/10/20	MLC	Conference call(s) Conference call with SEC concerning items of common interest	.90	1,183.50
02/10/20	MLC	Conference(s) in Office Conference with EBW and ACS re Beechwood litigation and potential settlement	.60	789.00
02/11/20	MLC	Analysis of Memorandum Review and analysis of outline of certain litigation arguments re SHIP and its relationship to other parties	1.40	1,841.00
02/12/20	MLC	Telephone Call(s) Telcon with SHIP receiver re potential settlement	.30	394.50
02/13/20	MLC	Conference(s) in Office Meeting with counsel re potential settlement with SHIP receiver	.40	526.00
02/13/20	MLC	Conference call(s) Beechwood - Telcon with SEC re: items of common interest	.70	920.50

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/13/20	MLC	Conference(s) in Office Meeting with Beechwood litigation team re: analysis of status of litigation and related matters (MLC Portion)	2.00	2,630.00
02/13/20	MLC	Review/analyze Beechwood - Review and analysis of draft of partial MSJ motion to be filed	1.80	2,367.00
02/14/20	MLC	Review/analyze Beechwood - preliminary review of MSJ motions filed in Beechwood litigation	1.30	1,709.50
02/16/20	MLC	Analysis of Memorandum Review of partial MSJ filed by Receiver	1.80	2,367.00
02/17/20	MLC	Review/analyze Beechwood - review and analysis of MSJ papers filed in Beechwood case	2.20	2,893.00
02/18/20	MLC	Review/analyze Beechwood - review of MSJ motion by Beechwood	1.10	1,446.50
02/19/20	MLC	Review/analyze Beechwood - reviewed and analyzed MSJ papers filed by SHIP	1.90	2,498.50
02/19/20	MLC	Review/analyze Beechwood - reviewed strategy of responding to Beechwood SHIP MSJ	1.30	1,709.50

OTTERBOURG P.C.
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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/20/20	MLC	Review/analyze Reviewed and analyzed arguments presented by SHIP in summary judgment motion	2.30	3,024.50
02/21/20	MLC	Telephone Call(s) Follow up telcon with SEC staff concerning items of common interest	.90	1,183.50
02/24/20	MLC	Analysis of Memorandum Reviewed and analyzed MORs in connection with Beechwood MSJ	1.80	2,367.00
02/24/20	MLC	Conference call(s) Conference call with SEC regarding items of common interest	.80	1,052.00
03/04/20	MLC	Draft/revise Reviewed and revised motion papers in opposition to MSJ	3.80	4,997.00
03/05/20	MLC	Analysis of Memorandum Reviewed and analyzed papers in opposition to MSJ motions	3.80	4,997.00
03/06/20	MLC	Draft/revise Reviewed and revised motion papers in opposition to MSJ	4.20	5,523.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/09/20 MLC	Analysis of Memorandum Review of papers filed by SHIP in opposition to Platinum motion re agency relationship with Beechwood	1.40	1,841.00
03/11/20 MLC	Telephone Call(s) Conference call with Neal Jacobson re status of various matters	.50	657.50
03/14/20 MLC	Draft/revise Reviewed draft of reply in support of agency MSJ	2.50	3,287.50
03/16/20 MLC	Analysis of Memorandum Review of papers filed by various parties including Huberfeld	1.30	1,709.50
03/17/20 MLC	Draft/revise Final review of reply memorandum prior to filing	1.50	1,972.50
03/20/20 MLC	Analysis of Memorandum Review of MSJ litigation briefs	1.60	2,104.00
03/23/20 MLC	Correspondence Correspondence with team re Beechwood litigation papers	.40	526.00
03/25/20 MLC	Conference call(s) Teleconference with SEC re: items of common interest	1.00	1,315.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/27/20 MLC	Analysis of Memorandum Analysis of SHIP letter	.90	1,183.50
03/27/20 MLC	Analysis of Memorandum Review of recent procedural rulings by Judge Rakoff	.40	526.00
03/29/20 MLC	Analysis of Memorandum Review and consideration of SHIP letter	.90	1,183.50
03/29/20 MLC	Correspondence Review of memo re SHIP correspondence	1.20	1,578.00
03/29/20 MLC	Draft/revise Drafted and revised letter to SHIP Receiver	.80	1,052.00
03/30/20 MLC	Prepare for Meeting Reviewed ASH analysis in preparation for settlement discussion with SHIP Receiver	1.10	1,446.50
03/31/20 MLC	Prepare for Meeting Prepared for settlement conference with SHIP receiver	1.30	1,709.50
03/31/20 MLC	Conference call(s) Conference call with EBW and ACS concerning evaluation of MSJ briefing (MLC Portion)	.90	1,183.50
TOTAL PHASE P14		75.50	\$99,282.50

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Phase: P15

ARBITRATION

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/03/20 MLC	Draft/revise Reviewed and revised draft mediation statement for arbitration mediation	2.20	2,893.00
01/05/20 MLC	Analysis of Memorandum Reviewed and analyzed revised memorandum in support of mediation statement	1.00	1,315.00
01/08/20 MLC	Review/analyze Prepared for mediation in arbitration proceeding	1.10	1,446.50
01/10/20 MLC	Review/analyze Review of confidential mediation statement	1.50	1,972.50
01/14/20 MLC	Review/analyze Review of confidential mediation statement	1.30	1,709.50
01/21/20 MLC	Prepare for Meeting Prepared for mediation with ACS and ASH on Jan 22	1.30	1,709.50
01/22/20 MLC	Conference Out of Office Prepared for mediation with ACS and ASH on Jan 22	7.00	9,205.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/10/20 MLC	Conference(s) in Office Meeting with ACS to review proposed changes to settlement agreement	.80	1,052.00
03/10/20 MLC	Analysis of Memorandum Review of proposed settlement agreement and proposed revisions to same	1.60	2,104.00
03/13/20 MLC	Analysis of Memorandum Review and analysis of proposed changes to settlement agreement	1.30	1,709.50
TOTAL PHASE P15		19.10	\$25,116.50
TOTAL FOR SERVICES			\$168,846.00

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

May 5, 2020
BILL NO. 209787

For Services Rendered Through March 31, 2020:

<u>DATE</u>		<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
Phase: P01		Asset Analysis & Recovery		
<u>ATTORNEY</u>				
01/02/20		Correspondence	.10	80.50
EBW		Lincoln - correspondence with contingency counsel regarding strategy.		
01/03/20		Correspondence	.20	161.00
EBW		Lincoln - correspondence with contingency counsel regarding strategy.		
01/06/20		Telephone Call(s)	.30	241.50
EBW		Lincoln - teleconference with B. Weisenberg and contingency counsel regarding status and strategy.		
01/08/20		Telephone Call(s)	.40	322.00
EBW		Greehey - teleconference with B. Weisenberg and adversary regarding discovery.		
01/09/20		Examine Documents	.10	85.00
JSF		Arabella Status - Payment		

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/09/20 EBW	Preparation for Conference Dispositions - preparation for bi-weekly team meeting.	.40	322.00
01/10/20 JSF	Conference(s) in Office Team Meeting with Receiver; Otterbourg and Goldin (JSF Portion)	2.20	1,870.00
01/10/20 JSF	Examine Documents Prepare for Team Meeting with Goldin and Otterbourg	.30	255.00
01/10/20 EBW	Preparation for Conference Administrative - preparation for bi-weekly status and strategy meeting.	.70	563.50
01/10/20 EBW	Conference(s) In Office Administrative - attendance at bi-weekly status and strategy meeting. (EBW Portion).	2.00	1,610.00
01/10/20 PCB	Conference call(s) Periodic Receiver; Otterbourg; Goldin and Platinum team review and strategy meeting. (PCB Portion)	2.10	1,858.50
01/10/20 ACS	Conference(s) w/ CoCounsel - Other Receiver-Goldin-Otterbourg meeting (ACS time)	2.10	1,911.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/15/20	EBW	Analysis of Legal Papers Agera - review of funding agreement issues.	.60	483.00
01/15/20	EBW	Analysis of Legal Papers Agera - attention to partial settlement issues.	.80	644.00
01/15/20	JKH	Research Agera - research re: funding agreement	.70	213.50
01/16/20	JKH	Research Agera - additional research re: funding agreement	.70	213.50
01/27/20	EBW	Telephone Call(s) Lincoln - teleconference and correspondence with contingency counsel.	.70	563.50
01/28/20	EBW	Telephone Call(s) Lincoln - teleconferences with B. Weisenberg and contingency counsel regarding settlement.	.90	724.50
01/29/20	EBW	Analysis of Legal Papers Lincoln - attention to settlement issues.	.80	644.00
01/30/20	EBW	Preparation for Conference Administrative - preparation for team meeting.	.60	483.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/31/20 EBW	Preparation for Conference Administrative - preparation for team meeting.	.40	322.00
01/31/20 EBW	Conference(s) In Office Dispositions - Team meeting (EBW portion).	1.70	1,368.50
01/31/20 PCB	Conference(s) In Office Team meeting with Receiver; Otterbourg; Goldin and Platinum. (PCB Portion)	1.20	1,062.00
02/10/20 EBW	Review Documents Greehey - attention to document production issues.	.30	241.50
02/10/20 AMD	Research re Client Greehey - Loan Repayment issues	1.60	472.00
02/11/20 EBW	Review Documents Greehey - attention to document production issues.	.20	161.00
02/11/20 AMD	Research re Client Greehey re: Obligation to Fund Loans	5.50	1,622.50
02/12/20 EBW	Review Documents Greehey - attention to document production issues; including review.	1.80	1,449.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/13/20 JKH	Correspondence Greehey - telephone call and email correspondence with B. Weisenberg re: Greehey production	.30	91.50
02/13/20 JKH	Document Production Greehey - review of documents in connection with document production	.60	183.00
02/13/20 AMD	Research re Client Greehey - Funding of Loans	2.90	855.50
02/14/20 JKH	Correspondence Greehey - telephone and email communications with B. Weisenberg re: document production to opposing counsel	.40	122.00
02/14/20 JKH	Correspondence Greehey - communications with vendor re: document production	.60	183.00
02/14/20 JKH	Document Production Greehey - redactions for document production	2.30	701.50
02/18/20 JSF	Examine Documents Arabella - Notice to Creditors in Chapter 15 - Final Meeting and Closing of Case	.20	170.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/18/20	EBW	Analysis of Legal Papers Lincoln - review of draft settlement agreement.	.40	322.00
02/18/20	EBW	Telephone Call(s) Lincoln - teleconference with contingency counsel regarding draft settlement agreement.	.40	322.00
02/18/20	JKH	Document Review Greehey - review document redactions	.60	183.00
02/19/20	JSF	Conference(s) in Office Team Meeting with Receiver and Goldin	1.40	1,190.00
02/19/20	EBW	Conference(s) In Office Administrative - participation in bi-weekly team status and strategy session.	1.50	1,207.50
02/19/20	PCB	Conference(s) In Office Team meeting with Receiver; Otterbourg; Goldin and Platinum (PCB Portion)	1.30	1,150.50
02/19/20	ACS	Conference(s) w/ CoCounsel - Other Receiver-Otterbourg team-Goldin team status meeting (ACS time)	1.30	1,183.00
02/19/20	JKH	Document Production Greehey - prepare document production	.40	122.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/19/20 AMD	Research re Client Greehey: Resend Re: Lender obligations	5.30	1,563.50
02/20/20 JKH	Document Production Greehey - prepare document production	1.30	396.50
02/21/20 JKH	Document Production Greehey - Prepare document production	1.40	427.00
02/24/20 JKH	Review Documents Greehey - review privilege log	.60	183.00
02/26/20 JKH	Prepare Legal Papers Greehey - prepare privilege log	1.80	549.00
03/01/20 JKH	Document Review Greehey - privilege log	2.00	610.00
03/03/20 JKH	Prepare Legal Papers Greehey - prepare privilege log	2.70	823.50
03/04/20 EBW	Preparation of Legal Papers Greehey - attention to privilege log.	.20	161.00
03/04/20 ACS	Review/correct Opposing brief for motion Review and insert comments in revised draft SHIP opposition brief and meet with drafting team to discuss	4.30	3,913.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/05/20	EBW	Preparation of Legal Papers Greehey - attention to privilege log.	.10	80.50
03/06/20	JSF	Telephone Call(s) Team Meeting Conference Call	.30	255.00
03/17/20	EBW	Analysis of Legal Papers Greehey - attention to deposition and discovery issues.	.40	322.00
03/17/20	EBW	Analysis of Legal Papers Lincoln - attention to settlement issues.	.10	80.50
03/25/20	EBW	Telephone Call(s) Greehey - teleconference with B. Weisenberg regarding status and strategy.	.50	402.50
03/25/20	EBW	Correspondence ALS - correspondence with team regarding status and correspondence with minority members.	.30	241.50
03/26/20	JKH	Document Review Greehey - reviewing document production	.60	183.00
03/27/20	JSF	Telephone Call(s) Team Meeting via Conference Call - Update on Open Items	.90	765.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/27/20	EBW	Telephone Call(s) ALS - teleconference with B. Weisenberg and T. Rogers regarding status and strategy.	.90	724.50
03/27/20	EBW	Telephone Call(s) ALS - teleconference with minority members and counsel.	.50	402.50
03/27/20	EBW	Analysis of Legal Papers Greehey - analysis of relevant documents.	.20	161.00
03/27/20	PCB	Conference call(s) Platinum team conference call with Receiver; Otterbourg; Goldin and Platinum.	.90	796.50
03/27/20	ACS	Telephone Call(s) w/CoCounsel - Other Receiver-Otterbourg-Goldin status telecon (ACS time)	.70	637.00
03/30/20	EBW	Telephone Call(s) Decision Diagnostics - teleconference with C. Solsvig; B. Weisenberg and T. Rogers regarding strategy and analysis of correspondence.	.80	644.00
03/30/20	EBW	Correspondence Greehey - correspondence and teleconference with B. Weisenberg regarding strategy.	.60	483.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/31/20 EBW	Telephone Call(s) Greehey - teleconference and correspondence with B. Weisenberg regarding strategy and scheduling.	.40	322.00
03/31/20 EBW	Telephone Call(s) Greehey - teleconference and correspondence with B. Weisenberg and adversary regarding scheduling.	.40	322.00
TOTAL PHASE P01		72.20	\$43,383.00

Phase: P02 Asset Disposition

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/07/20 ACS	Telephone Call(s) w/CoCounsel - Other Telecon S Dumain; RShimon and B Weisenberg re CBOE mediation	.20	182.00
01/22/20 PCB	Preparation of Documents Cokal - Preparation of buyer NDA.	.40	354.00
01/22/20 PCB	Correspondence Cokal - Correspondence including transmittal of Cokal buyer NDA.	.20	177.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/27/20 EBW	Telephone Call(s) Abdala - teleconference with Receiver and purchaser.	.30	241.50
01/28/20 PCB	Review Documents Cokal - Review and analysis of Amendment to Litigation Funding Agreement.	.80	708.00
01/28/20 PCB	Memo Cokal - Preparation of analysis of litigation funding agreement.	.60	531.00
02/05/20 JSF	Examine Documents Status of Remaining non-Litigation Assets (Updates) and Ongoing Litigations	2.30	1,955.00
02/05/20 EBW	Review Documents Abdala - attention to issues regarding correspondence from buyer.	.60	483.00
02/06/20 EBW	Correspondence Abdala - correspondence with team regarding issues raised by buyer.	.60	483.00
02/07/20 EBW	Correspondence Abdala - correspondence and teleconference with counsel for buyer regarding post-closing issues.	.40	322.00
02/10/20 JSF	Examine Documents Possible Sale of Cokal Royalty Details	.30	255.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/14/20	JSF	Examine Documents Asset Status and Settlement Status for Update	1.80	1,530.00
02/17/20	EBW	Correspondence Abdala - analysis of proposal by buyer.	.30	241.50
02/17/20	EBW	Correspondence Cokal - analysis of purchase proposal.	.30	241.50
02/17/20	WMM	Legal services/Client Abdala: Review email from buyer's counsel and communications concerning response to same.	.50	447.50
02/18/20	JSF	Examine Documents Prepare for Team Meeting - Update on Asset Recoveries and Resolved Litigations	1.40	1,190.00
02/19/20	JSF	Examine Documents Remaining Asset List	.80	680.00
02/21/20	JSF	Examine Documents Letter with WPP re: Final Payments on Lease	.20	170.00
02/24/20	PCB	Review File Cokal - Review and analysis of existing Cokal documents such as Escrow Deed and Royalty Deed.	.90	796.50

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/24/20	PCB	Review Documents Cokal - Review and analysis of appropriate Purchase Agreement precedent.	.60	531.00
02/24/20	PCB	Preparation of Documents Cokal - Initial drafting of Asset/Securities Purchase Agreement.	1.30	1,150.50
02/26/20	PCB	Preparation of Documents Cokal - Completed drafting of Cokal Purchase Agreement.	1.70	1,504.50
02/26/20	PCB	Correspondence Cokal - Correspondence including transmittal of draft Purchase Agreement.	.40	354.00
02/27/20	PCB	Revision of Documents Cokal - Further revision of draft Purchase Agreement.	.80	708.00
02/27/20	PCB	Correspondence Cokal - Correspondence and review of correspondence re: Purchase Agreement.	.30	265.50
03/02/20	PCB	Correspondence Cokal: Correspondence and review of correspondence re: Asset Purchase Agreement.	.50	442.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/02/20 PCB	Revision of Documents Cokal - Revision of Asset Purchase Agreement and transmittal thereof.	.80	708.00
03/03/20 ACS	Correspondence w/CoCounsel - Other E-mails to/from S Dumain re CBOE settlement	.30	273.00
03/03/20 ACS	Review/correct Settlement Agreement Review and edit draft CBOE settlement	1.20	1,092.00
03/05/20 JSF	Examine Documents Letter Agreement with WPP re: LC Energy Lease Final Payment	.20	170.00
03/05/20 JSF	Examine Documents Prepare for Team Meeting- Asset Update	.70	595.00
03/09/20 PCB	Preparation of Documents Cokal - Preparation of Acknowledgment and Agreement to Asset Purchase Agreement.	.50	442.50
03/09/20 PCB	Correspondence Cokal - Correspondence and review of correspondence re: APA and Acknowledgement and Agreement thereto.	.30	265.50
03/13/20 PCB	Review Documents Cokal - Review and analysis of counterparty comments to APA.	.50	442.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/13/20 PCB	Correspondence Cokal - Correspondence with Goldin including responses to requested changes to APA.	.70	619.50
03/16/20 PCB	Correspondence Cokal - Correspondence and review of correspondence including purchaser comments to Asset Purchase Agreement.	.80	708.00
03/16/20 PCB	Revision of Documents Cokal - Revision of Asset Purchase Agreement.	1.20	1,062.00
03/16/20 PCB	Review File Cokal - Review precedent re: APA reps and warranties.	.40	354.00
03/16/20 PCB	Revision of Documents Cokal - Finalize revised draft Asset Purchase Agreement and transmittal of same.	1.00	885.00
03/16/20 ACS	Telephone Call(s) w/CoCounsel - Other Telecon S Dumain and C Smith re CBOE settlement issues	.30	273.00
03/17/20 PCB	Revision of Documents Cokal - Further revisions to Asset Purchase Agreement in response to comments.	.80	708.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/17/20 PCB	Correspondence Cokal - Correspondence and review of correspondence including explanation of UCC termination provisions.	.70	619.50
03/17/20 PCB	Due Diligence Research Cokal - Due diligence research re: Alpine Invest Holding Ltd.	.40	354.00
03/17/20 ACS	Analysis of Legal Papers Review record re Platinum entities not either in NY or Cayman receivership/liquidations for CBOE settlement (.4) and e-mails to/from T. Rogers re same (.2)	.60	546.00
03/17/20 ACS	Correspondence w/CoCounsel - Other E-mails to/from S Dumain re entities not under control of either receivership/liquidation estate	.30	273.00
03/18/20 PCB	Review Documents Cokal - Review and analysis of purchaser markup of Asset Purchase Agreement.	.50	442.50
03/18/20 PCB	Revision of Documents Cokal - Revision of Asset Purchase Agreement with purchaser comments.	1.00	885.00
03/18/20 PCB	Correspondence Cokal - Correspondence and review of correspondence.	.30	265.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/18/20 ACS	Telephone Call(s) w/CoCounsel - Other Telecon S Dumain and C Smith re CBOE settlement	.20	182.00
03/18/20 ACS	Telephone Call(s) w/CoCounsel - Other Telecon S Dumain; C Smith; CBOE and its counsel re CBOE settlement	.80	728.00
03/19/20 EBW	Analysis of Legal Papers Cokal - attention to transaction issues.	.40	322.00
03/19/20 PCB	Revision of Documents Cokal - Proposed final revisions to Asset Purchase Agreement.	.70	619.50
03/19/20 PCB	Correspondence Cokal - Correspondence and review of correspondence including transmittal of proposed final Asset Purchase Agreement.	.30	265.50
03/23/20 ACS	Correspondence w/CoCounsel - Other E-mails to/from S Dumain re CBOE settlement	.40	364.00
03/24/20 PCB	Correspondence Cokal - Correspondence and review of correspondence re: execution and delivery of APA.	.40	354.00
03/25/20 ACS	Telephone Call(s) w/CoCounsel - Other Telecon with CBOE mediator and counsel re CBOE settlement issues	.90	819.00

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03/26/20 PCB	Correspondence Cokal - Correspondence re: final execution APA.	.30	265.50
03/26/20 PCB	Review Documents Cokal - Review and sign-off on final execution version of APA.	.40	354.00
03/27/20 PCB	Correspondence Cokal - Correspondence with Receiver and Goldin re: execution of Cokal APA.	.20	177.00
03/31/20 ACS	Correspondence w/CoCounsel - Other E-mail to/from S Dumain re CBOE settlement	.20	182.00
TOTAL PHASE P02		37.20	\$32,560.50

Phase: P04

Case Administration

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/02/20 JSF	Examine Documents Status Update for Investors	.80	680.00
01/02/20 ASH	Conference(s) w/ CoCounsel - Other Meet with ACS; Trey Rogers and Brent Weisenberg re receivership v. bankruptcy	1.60	1,240.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/02/20 ACS	Conference(s) w/ CoCounsel - Other Meet with T Rogers and B Weisenberg re receivership v. bankruptcy	1.60	1,456.00
01/02/20 ACS	Telephone Call(s) w/CoCounsel - Other Telecon S Rhodes Re: S&W Settlement	.10	91.00
01/02/20 ACS	Analysis of Settlement Agreement Revise S&W settlement per conversation with S. Rhodes	.20	182.00
01/03/20 ACS	Review/correct Settlement Agreement Edit S&W settlement agreement and confession of judgment per Rhodes comments and subsequent telecon	.60	546.00
01/03/20 ACS	Correspondence w/CoCounsel - Other E-mail to N Jacobson; M Bradylyons and the Receiver re S&W	.20	182.00
01/03/20 ACS	Preparation of Legal Papers Draft Receiver declaration re receivership v. bankruptcy	.50	455.00
01/06/20 EBW	Preparation for Conference SEC - preparation for teleconference with SEC regarding matters of joint interest.	.50	402.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/06/20 EBW	Telephone Call(s) SEC - teleconference with SEC and W. Edwards regarding matters of joint interest; including pre-call with W. Edwards.	.50	402.50
01/06/20 ACS	Review/correct Settlement Agreement Further edit S&W settlement agreement	.20	182.00
01/06/20 ACS	Correspondence w/CoCounsel - Other E-mail to S. Rhodes re S&W settlement	.20	182.00
01/06/20 ACS	Preparation of Legal Papers Draft declaration re receiver versus bankruptcy	.70	637.00
01/07/20 ASH	Research re Brief for motion Legal research regarding bankruptcy vs. receivership issue	5.60	4,340.00
01/07/20 ASH	Conference(s) w/ CoCounsel - Other Meet with ACS regarding issues relating to bankruptcy vs. receivership issue	.50	387.50
01/07/20 ASH	Telephone Call(s) w/CoCounsel - Other With Adam Silverstein and Trey Rogers regarding issues relating to bankruptcy vs. receivership	.90	697.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/07/20 EBW	Telephone Call(s) Investors - teleconference with investor regarding case inquiries.	.30	241.50
01/07/20 EBW	Preparation of Legal Papers Administrative - preparation of status report.	.70	563.50
01/07/20 EBW	Conference(s) In Office Administrative - conference with A. Silverstein and A. Halpern regarding "bankruptcy" response.	.30	241.50
01/07/20 ACS	Preparation of Legal Papers Draft declaration re receivership v. bankruptcy	1.80	1,638.00
01/08/20 JSF	Prepare Legal Papers Agenda for Team Meeting and Issues for Discussion	.50	425.00
01/08/20 ASH	Preparation of Brief for motion Prepare Memorandum of Law relating to issue of bankruptcy vs. receivership raised by Judge Cogan	2.90	2,247.50
01/08/20 ASH	Research re Brief for motion Legal research regarding bankruptcy vs. receivership issue;	3.40	2,635.00

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01/08/20 ASH	Conference(s) w/ CoCounsel - Other Meet with ACS and Receiver regarding bankruptcy vs. receivership issue	.50	387.50
01/08/20 ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with Neal Jacobson and ACS regarding bankruptcy vs. receivership issue	.30	232.50
01/08/20 EBW	Telephone Call(s) Defendants - teleconference with T. Rogers regarding Small pre-trial conference.	.20	161.00
01/08/20 EBW	Preparation of Legal Papers Administrative - attention to status report.	1.10	885.50
01/08/20 ACS	Preparation of Legal Papers Draft Receiver declaration on receivership v. bankruptcy	4.80	4,368.00
01/08/20 ACS	Telephone Call(s) w/CoCounsel - Other Telecon T. Rogers re data for receivership v. bankruptcy	.40	364.00
01/08/20 ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon N Jacobson re receivership v. bankruptcy	.30	273.00

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01/08/20 ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and Receiver re receivership v. bankruptcy	.50	455.00
01/08/20 JKH	Diary & Docket Calendar potential date for Small trial	.10	30.50
01/09/20 JSF	Correspondence Goldin and Otterbourg re: Team Meeting and Agenda	.20	170.00
01/09/20 JSF	Examine Documents 13-Week Cash Flow	.10	85.00
01/09/20 ASH	Telephone Call(s) w/CoCounsel - Other Teleconference with ACS and Trey Rogers re bankruptcy vs. receivership	.70	542.50
01/09/20 ASH	Conference(s) w/ CoCounsel - Other Meeting with ACS and Brent Weisenberg regarding bankruptcy vs. receivership	.40	310.00
01/09/20 ASH	Research re Brief for motion Legal research regarding bankruptcy vs. receivership	2.60	2,015.00
01/09/20 ASH	Preparation of Brief for motion Regarding bankruptcy vs. receivership	2.10	1,627.50

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01/09/20 EBW	Telephone Call(s) SEC - teleconference with SEC regarding items of mutual interest.	.10	80.50
01/09/20 ACS	Preparation of Legal Papers Draft declaration re receivership v. bankruptcy	1.20	1,092.00
01/09/20 ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and B Weisenberg re bankruptcy v receivership	.40	364.00
01/09/20 ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and telecon T Rogers re bankruptcy v receivership	.70	637.00
01/10/20 JSF	Prepare Legal Papers Status Report Outline	.60	510.00
01/10/20 ASH	Research re Brief for motion Legal research regarding issue of bankruptcy vs. receivership	1.80	1,395.00
01/10/20 EBW	Preparation for Conference Investor - preparation for investor teleconference.	.50	402.50
01/10/20 ACS	Preparation of Legal Papers Draft declaration re receivership v bankruptcy	1.80	1,638.00

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01/10/20 ACS	Correspondence w/CoCounsel - Other E-mail from/to M Bradylyons re S&W	.10	91.00
01/11/20 JSF	Prepare Legal Papers Status Report for Fourth Quarter	1.60	1,360.00
01/11/20 ASH	Research re Brief for motion Legal research regarding bankruptcy vs. receivership	1.20	930.00
01/11/20 ACS	Preparation of Legal Papers Bankruptcy vs Receivership	2.30	2,093.00
01/12/20 JSF	Prepare Legal Papers Fourth Quarter Status Report	.80	680.00
01/12/20 ASH	Preparation of Brief for motion Memorandum of Law regarding bankruptcy vs. receivership	2.40	1,860.00
01/12/20 ASH	Analysis of Legal Papers Documents regarding establishment of bar date notice for use in brief re bankruptcy vs. receivership	.30	232.50
01/12/20 ASH	Analysis of Court Decision Analyze opinion staying action and related court filings; email to ACS regarding same	.40	310.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/12/20 ACS	Preparation of Legal Papers Draft Receiver declaration re receivership v. bankruptcy	3.60	3,276.00
01/13/20 JSF	Prepare Legal Papers Update Status Report	2.10	1,785.00
01/13/20 JSF	Correspondence Trey Rogers and W. Edwards re: Property List	.20	170.00
01/13/20 JSF	Examine Documents Property List	.20	170.00
01/13/20 ASH	Review/correct Affidavit for motion Draft of Declaration of the Receiver regarding bankruptcy vs. receivership	.80	620.00
01/13/20 ASH	Preparation of Brief for motion Memorandum of Law re bankruptcy vs. receivership	1.50	1,162.50
01/13/20 ASH	Research re Brief for motion Legal research regarding issues relating to bankruptcy vs. receivership; emails to ACS regarding same	1.30	1,007.50
01/13/20 EBW	Preparation for Conference Investor - preparation for investor call; including pre-call with W. Edwards.	.70	563.50

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01/13/20 EBW	Telephone Call(s) Investor - teleconference with investor and W. Edwards.	.50	402.50
01/13/20 EBW	Preparation of Memorandum Administrative - preparation of status report.	2.10	1,690.50
01/13/20 EBW	Preparation of Legal Papers Administrative - revisions to Cyganowski declaration regarding court's bankruptcy inquiry.	1.10	885.50
01/13/20 ACS	Preparation of Legal Papers Draft and edit declaration re receivership v. bankruptcy	7.30	6,643.00
01/13/20 ACS	Telephone Call(s) w/Adversary Telecon S Rhodes re S&W	.10	91.00
01/13/20 ACS	Correspondence w/CoCounsel - Other E-mail to/from M Bradylyons re S&W	.20	182.00
01/13/20 WMM	Legal services/Legal Papers Analyzing revised draft of MLC affidavit cocnerning PPCO bankruptcy.	1.00	895.00
01/14/20 JSF	Examine Documents Tax Update from T. Rogers	.30	255.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/14/20 JSF	Prepare Legal Papers Further Review and Updates to Status Report	.60	510.00
01/14/20 ASH	Preparation of Brief for motion Prepare memorandum of law regarding bankruptcy vs. receivership	2.70	2,092.50
01/14/20 ASH	Conference(s) w/ CoCounsel - Other Meet with ACS regarding bankruptcy vs. receivership	.50	387.50
01/14/20 ASH	Research re Brief for motion Legal research regarding legal issues relating to bankruptcy vs. receivership	1.90	1,472.50
01/14/20 EBW	Telephone Call(s) Investors - teleconference with counsel for investors regarding items of mutual interest.	.20	161.00
01/14/20 EBW	Analysis of Legal Papers Administrative - attention to issues regarding potential conversion to bankruptcy.	.70	563.50
01/14/20 ACS	Conference(s) w/ CoCounsel - Other Meet with ASH re receivership v. bankruptcy	.50	455.00
01/14/20 ACS	Preparation of Legal Papers Edit receivership v. bankruptcy declaration per comments	2.20	2,002.00

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01/15/20	JSF	Examine Documents Declaration in Response to Minute Order of Court re: Bankruptcy	1.20	1,020.00
01/15/20	JSF	Prepare Legal Papers Update Status Report	2.60	2,210.00
01/15/20	JSF	Examine Documents SFAR for Fourth Quarter	.30	255.00
01/15/20	JSF	Examine Documents Amended Property List	.20	170.00
01/15/20	ASH	Review/correct Affidavit for motion Revise Receiver's declaration regarding bankruptcy vs. receivership in response to Judge Cogan's December 12; 2019 Order; analyze background documents regarding same	2.40	1,860.00
01/15/20	ASH	Preparation of Brief for motion Memorandum of Law regarding bankruptcy vs. receivership in response to Judge Cogan's December 12; 2019 Minute Order	.90	697.50
01/15/20	ASH	Research re Brief for motion Legal research regarding when bankruptcy law can be used by analogy to fill in the gaps in receivership law; review case law regarding issues relating to bankruptcy vs. receivership	1.50	1,162.50

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01/15/20 EBW	Preparation of Memorandum Administrative - preparation of status report.	2.20	1,771.00
01/15/20 ACS	Review/correct Legal Papers Further edit declaration re receivership v. bankruptcy	1.20	1,092.00
01/15/20 ACS	Correspondence w/CoCounsel - Other E-mail to A Bambach and N Jacobson re Issue of Common Interest	.20	182.00
01/15/20 ACS	Review/correct Legal Papers Edit memo of law re receivership v. bankruptcy	2.00	1,820.00
01/16/20 JSF	Telephone Call(s) Trey Rogers re: Status Report	.10	85.00
01/16/20 ASH	Review/correct Brief for motion Memorandum of Law regarding bankruptcy vs. receivership in response to Judge Cogan's December 12; 2019 Minute Order	2.20	1,705.00
01/16/20 ASH	Research re Brief for motion Legal research regarding issues relating to bankruptcy vs. receivership; analyze cases cited in memorandum of law	1.10	852.50

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01/16/20	EBW	Telephone Call(s) PPVA - teleconference with counsel for PPVA regarding items of joint interest.	.30	241.50
01/16/20	EBW	Preparation of Legal Papers Administrative - revisions to indemnity v bankruptcy memorandum of law.	1.10	885.50
01/16/20	ACS	Review/correct Legal Papers Edit memo of law re receivership v. bankruptcy	3.80	3,458.00
01/16/20	ACS	Telephone Call(s) w/CoCounsel - Other Telecon N Jacobson re items of common Interest	.20	182.00
01/16/20	ACS	Correspondence w/CoCounsel - Other E-mail to A Bambach and N Jacobson re bankruptcy v. receivership	.20	182.00
01/16/20	ACS	Correspondence w/CoCounsel - Other E-mail to S Rhodes re S&W	.10	91.00
01/16/20	ACS	Review/correct Legal Papers Final edits to memo of law and declaration re receivership v. bankruptcy	3.40	3,094.00

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01/17/20	ASH	Review/correct Brief for motion Revise and finalize Memorandum of Law regarding bankruptcy vs. receivership in resposne to Judge Cogan's December 12; 2019 Order	2.30	1,782.50
01/17/20	ASH	Review/correct Affidavit for motion Revise and finalize Declaration of Receiver regarding bankruptcy vs. receivership in response to December 12; 2019 Order	1.50	1,162.50
01/17/20	ASH	Analysis of Brief for motion Analyze papers filed by the SEC; the PPVA Liquidators; Joseph San Filippo and David Levy in response to Judge Cogan's question regarding bankruptcy vs. receivership	.30	232.50
01/17/20	EBW	Analysis of Legal Papers Administrative - review of filings regarding bankruptcy issue and correspondence with team regarding same.	1.70	1,368.50
01/17/20	ACS	Telephone Call(s) w/Court Meet with AW and telecon 2nd Cir. case manager re S&W	.20	182.00
01/17/20	ACS	Review/correct Legal Papers Review and edit 10th status report	.50	455.00
01/17/20	GSL	Review/correct Memorandum Re receivership vs. bankruptcy brief	1.70	612.00

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01/17/20	WMM	Legal services/Legal Papers Review draft MOL on bankruptcy issue and communications concerning same; review SEC's MOL on same; review San Felippo's papers on same.	1.80	1,611.00
01/19/20	ACS	Preparation of Correspondence Review and edit 10th status report	2.10	1,911.00
01/21/20	JSF	Prepare Legal Papers Revise and Finalize Status Report for Filing	2.10	1,785.00
01/21/20	ACS	Review/correct Legal Papers Further edit 10th status report	.80	728.00
01/21/20	ACS	Review/correct Legal Papers Edit motion for extension of time to 2nd Cir. re S&W appeal	.80	728.00
01/21/20	ACS	Correspondence w/Adversary E-mails to/from J Grekin re S&W appeal	.20	182.00
01/21/20	JKH	Prepare Legal Papers Preparing cover letter and chambers copies of Receiver's Tenth Status Report	.20	61.00

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01/22/20 EBW	Analysis of Legal Papers Administrative - analysis of Judge's order regarding bankruptcy and indemnification; as well as correspondence with team regarding same.	.80	644.00
01/22/20 EBW	Telephone Call(s) Taxes - teleconference with T. Rogers and California franchise board.	.40	322.00
01/22/20 EBW	Correspondence Defendants - correspondence with counsel for SanFilippo.	.20	161.00
01/22/20 ACS	Review/correct Legal Papers Finalize S&W time extension motion in 2nd Cir. on S&W appeal	.10	91.00
01/22/20 WMM	Legal services/Client Communications concerning Court's decision concerning PPCO bankruptcy.	.70	626.50
01/23/20 ACS	Review/correct Suppl'l aff. for motion Edit memo of law in support of motion for approval of S&W settlement	2.70	2,457.00
01/24/20 EBW	Telephone Call(s) Administrative - teleconference with counsel for SanFillipo.	.40	322.00

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01/24/20	ACS	Review/correct Suppl'l aff. for motion Edit memo of law in support of motion to approve settlement with S&W	.30	273.00
01/27/20	ACS	Review/correct Suppl'l aff. for motion Edit memo of law in support of motion for approval of S&W	.30	273.00
01/27/20	ACS	Preparation of Affidavit for motion Draft Receiver declaration in support of S&W settlement motion	.20	182.00
01/27/20	ACS	Preparation of Suppl'l br'f for motion Draft proposed order in support of S&W settlement motion	.30	273.00
01/27/20	ACS	Preparation of Legal Papers Edit notice of motion re S&W settlement	.20	182.00
01/27/20	ACS	Correspondence w/CoCounsel - Other E-mail to N Jacobson and M Bradylyons re S&W settlement	.30	273.00
01/27/20	ACS	Correspondence w/Adversary E-mail to S Rhodes; D Weiner; M Bradylyons and N Jacobson	.20	182.00
01/27/20	ACS	Telephone Call(s) w/CoCounsel - Other Meet with Receiver and telecon A Diamond re Issues of Common interest	.20	182.00

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01/29/20 ASH	Analysis of Order Receivership Order for SHIP; Receivership Orders for the PPCO Funds	.20	155.00
01/29/20 EBW	Telephone Call(s) PPVA - teleconference with counsel for PPVA Feeder Fund regarding items of mutual interest.	.30	241.50
01/29/20 EBW	Analysis of Legal Papers Taxes - review of retention agreement for Deloitte.	.60	483.00
01/30/20 EBW	Analysis of Legal Papers Tax - attention to Deloitte retention issues.	.20	161.00
01/31/20 JSF	Conference(s) in Office Team Meeting with Receiver; Goldin and Otterbourg (JSF portion)	.60	510.00
01/31/20 ACS	Conference(s) w/ CoCounsel - Other Receiver-Goldin-Otterbourg meeting (ACS Portion)	1.20	1,092.00
02/03/20 EBW	Correspondence Administrative - attention to claims agent issues.	.20	161.00

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02/03/20	ACS	Correspondence w/Adversary E-mail to/from S Rhodes and D Weiner re S&W settlement motion	.20	182.00
02/05/20	ACS	Correspondence w/Adversary E-mail to S Rhodes and D Weiner re S&W settlement motion	.10	91.00
02/05/20	ACS	Review/correct Suppl'l aff. for motion Review and incorporate comments of D Weiner to S&W settlement motion brief	.20	182.00
02/05/20	ACS	Review/correct Suppl'l aff. for motion Finalize S&W settlement motion for filing	.50	455.00
02/06/20	ACS	Correspondence w/Adversary E-mail to D Weiner and S Rhodes re S&W settlement	.10	91.00
02/06/20	ACS	Preparation of Correspondence Letter to Judge Cogan re S&W settlement	.10	91.00
02/12/20	JSF	Correspondence Administrative Matters - Scheduling Meeting and Agenda Items for Next Meeting	.40	340.00
02/14/20	EBW	Telephone Call(s) PPVA - teleconference with Goldin regarding PPVA issues.	.50	402.50

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02/18/20	JSF	Correspondence Receivership Team re: Team Meeting and Update	.20	170.00
02/19/20	JSF	Examine Documents Prepare for Team Meeting - Agenda Items	.70	595.00
02/19/20	JKH	Diary & Docket PPVA - review of email with attached notice of creditor meeting; calendar date and respond to email	.30	91.50
02/21/20	JSF	Examine Documents Status of Open Settlements and Documentation/Payments	.60	510.00
02/24/20	ACS	Review/correct Suppl'l br'f for motion Review S&W settlement approval order	.10	91.00
02/24/20	ACS	Correspondence w/Adversary E-mails from/to D Weiner re: S&W	.20	182.00
02/24/20	JKH	Diary & Docket S&W - calendar settlement payment dates	.20	61.00
02/25/20	ACS	Correspondence w/Adversary E-mails to/from D Weiner re S&W settlement	.20	182.00
02/25/20	ACS	Telephone Call(s) w/CoCounsel - Other Telecon D Weiner re S&W settlement	.10	91.00

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03/09/20 EBW	Analysis of Legal Papers Administrative - attention to issues regarding indemnification claims.	.20	161.00
03/10/20 JSF	Examine Documents Platinum Status Report	.40	340.00
03/10/20 EBW	Preparation of Memorandum Administrative - preparation of status report.	.60	483.00
03/15/20 ASH	Examine Documents Analyze tolling agreement with BDO and related documents; emails with EBW; ACS and Brent Weisenberg regarding same	.30	232.50
03/16/20 EBW	Correspondence Investors - attention to investor inquiries.	.30	241.50
03/17/20 EBW	Analysis of Legal Papers PPVA - review of status report.	.40	322.00
03/18/20 EBW	Analysis of Legal Papers PPVA - attention to PPVA issues; including preparation for creditors' meeting and correspondence with Goldin.	.60	483.00

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03/19/20 EBW	Telephone Call(s) PPVA - teleconference with Goldin; B. Weisenberg and T. Rogers regarding claim issues.	.40	322.00
03/20/20 EBW	Telephone Call(s) Teleconference with counsel for BCLIC regarding document requests.	.10	80.50
03/20/20 WMM	Legal services/Client Communications among concerning scheduling call with the court; about deposition and oral arguments; communications concerning scheduling call with counsel for BCLIC/WNIC about other discovery issues.	.60	537.00
03/23/20 EBW	Telephone Call(s) PPVA - teleconference with counsel for JOLs regarding items of mutual interest.	.30	241.50
03/23/20 ACS	Telephone Call(s) w/CoCounsel - Other Telecon B Weisenberg re subpoena served on receivership	.20	182.00
03/24/20 EBW	Telephone Call(s) Administrative - teleconference with W. Moran and counsel for BCLIC and WNIC regarding state court subpoena.	.50	402.50

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03/24/20	WMM	Legal services/Client Prepare for and participate in conference call with counsel for BCLIC/WNIC in state court actions concerning document production.	.50	447.50
03/25/20	EBW	Correspondence Administrative - correspondence with litigation team regarding BCLIC subpoena.	.30	241.50
03/26/20	JKH	Research Review of emails re: BCLIC WNIC Subpoena	1.30	396.50
03/26/20	JKH	Review/analyze Review emails re: BCLIC/WNIC subpoena	.70	213.50
03/27/20	JSF	Examine Documents Active Items for Status Report	.40	340.00
03/27/20	EBW	Telephone Call(s) Administrative - participation in bi-weekly Platinum team call. (EBW portion).	.40	322.00
03/27/20	JKH	Prepare Legal Papers Begin draft memo re: BCLIC/WNIC subpoena	1.30	396.50
03/27/20	JKH	Review/analyze Review BCLIC/WNIC subpoena	.30	91.50

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/28/20	ASH	Analysis of Settlement Agreement Provisions of Settlement Agreement relevant to status reports	.60	465.00
03/29/20	JKH	Document Review Review of emails in response to BCLIC/WNIC Subpoena	2.00	610.00
03/30/20	JSF	Prepare Legal Papers Status Report	2.80	2,380.00
03/30/20	JKH	Document Review Review of emails relating to BCLIC/WNIC subpoena	2.60	793.00
03/30/20	JKH	Prepare Legal Papers Draft memo re: BCLIC/WNIC subpoena	2.80	854.00
03/31/20	JSF	Prepare Legal Papers Quarterly Status Report	1.20	1,020.00
03/31/20	WMM	Legal services/Client Communcations concerning BCLIC/WNIC subpoena in NY state court action and reviewing same; communications concerning steps taken for production of documents in the PPCO server.	1.50	1,342.50
TOTAL PHASE P04			169.70	\$135,895.00

Phase: P10

Forensic Accounting

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/06/20 EBW	Telephone Call(s) Forensics - teleconference with B. Weisenberg regarding tolling agreements and settlements.	.40	322.00
01/08/20 EBW	Preparation of Legal Papers Forensic - revisions to Landesman settlement agreement.	.40	322.00
01/15/20 GSL	Analysis/Strategy Research - re statute of limitations for Additional Action	2.80	1,008.00
01/15/20 GSL	Preparation of Memorandum Prepared memo - re research on statute of limitations	1.10	396.00
01/16/20 EBW	Analysis of Legal Papers Forensics - review of Cassidy/Nordlicht settlement agreements and correspondence with parties regarding same.	.90	724.50
01/16/20 GSL	Preparation of Memorandum Continued preparing summary of research - re statute of limitations	.90	324.00
01/17/20 EBW	Preparation of Legal Papers Forensics - attention to settlement issues	.40	322.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/17/20 WMM	Legal services/Legal Papers Attention to analysis of SOL for potential claims and communications concerning same.	1.40	1,253.00
01/30/20 EBW	Analysis of Legal Papers Forensics - attention to settlement issues Landesman	.40	322.00
02/04/20 EBW	Analysis of Legal Papers Forensics - attention to Landesman settlement issues.	.20	161.00
02/05/20 EBW	Analysis of Legal Papers Forensics - attention to Landesman settlement issues.	.90	724.50
02/06/20 EBW	Analysis of Legal Papers Forensics - attention to issues regarding Landesman settlement.	.80	644.00
02/19/20 ASH	Analysis of Legal Papers Tolling Agreements	.30	232.50
02/19/20 ASH	Telephone Call(s) w/CoCounsel - Other emails and telephone call regarding extending tolling agreement	.30	232.50
02/19/20 JKH	Review/analyze A&M - review prior tolling and email communication	.20	61.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/20/20	ASH	Preparation of Legal Papers Third Amendment to tolling agreement; emails with counsel regarding same	.90	697.50
02/26/20	EBW	Telephone Call(s) Forensics - teleconference with PPVA's counsel regarding joint interest items.	.30	241.50
03/16/20	ASH	Correspondence w/Adversary Counsel regarding possible extension of tolling agreement	.20	155.00
03/17/20	JKH	Prepare Legal Papers preparing Fourth Amended Tolling Agreement	.50	152.50
03/25/20	ASH	Preparation of Legal Papers Prepare fourth amendment to tolling agreement with BDO; email to Counsel regarding same	.50	387.50
03/26/20	ASH	Preparation of e-mail(s) To Counsel regarding tolling agreement	.20	155.00
03/27/20	ASH	Preparation of e-mail(s) To Receiver regarding tolling agreement	.20	155.00
03/27/20	JKH	Diary & Docket Update calendar re: tolling agreement	.10	30.50
TOTAL PHASE P10			14.30	\$9,023.50

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Phase: P14

BEECHWOOD LITIGATION

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/01/20 ASH	Memorandum to CoCounsel - Other To Brent Weisenberg; WMM and GSL regarding response to SHIP's notice to admit	.50	387.50
01/02/20 ASH	Conference(s) w/ CoCounsel - Other Meet with Brent Weisenberg; Trey Rogers; WMM and GSL regarding responses to SHIP's notice to admit	2.50	1,937.50
01/02/20 ASH	Preparation of Ans. to req. for adm. Responses to SHIP's First Set of Requests for Admission Directed to the Receiver	1.50	1,162.50
01/02/20 ASH	Analysis of Ans. to req. for adm. SHIP's responses to requests for admissions served by Lincoln	.30	232.50
01/02/20 EBW	Analysis of Legal Papers Beechwood - attention to issues regarding requests to admit; review of court orders.	.60	483.00
01/02/20 GSL	Conference(s) re Ans. to req. Team Meeting - re Response to SHIP RFAs	3.50	1,260.00
01/02/20 JKH	Review/analyze Beechwood - document searches and review of certain trust accounts	2.40	732.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/02/20	JKH	Prepare Legal Papers Beechwood - preparing document binders of trust statements	1.30	396.50
01/02/20	JKH	Review/analyze Beechwood - review of Hart transcript	2.30	701.50
01/02/20	JKH	Review/analyze Beechwood - review of Feuer (day 1) transcript	1.30	396.50
01/02/20	WMM	Legal services/Client Prepare for and participate in team meeting to respond the SHIP's Requests for Admssion.	4.70	4,206.50
01/03/20	ASH	Preparation of Ans. to req. for adm. Responses to SHIP's First Set of Requests for Admission Directed to the Receiver	3.20	2,480.00
01/03/20	ASH	Telephone Call(s) w/CoCounsel - Other with Trey Rogers regarding facts	.20	155.00
01/03/20	ASH	Examine Documents Documents regarding IMAs	.90	697.50
01/03/20	ASH	Analysis of Order Judge Rakoff's decision regarding motion to dismiss filed by Ezra Beren	.20	155.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/03/20 ASH	Correspondence w/CoCounsel - Other to Mary Jane Constant regarding factual issues	.20	155.00
01/03/20 JKH	Review/analyze Beechwood - review and make notes of Feuer (day 1) transcript	2.40	732.00
01/03/20 JKH	Review/analyze Beechwood - review of Dessert Hawk assignments and Wilmington Trust Statements	2.60	793.00
01/03/20 JKH	Review/analyze Beechwood - review of funds flow letters and trust statements	1.70	518.50
01/03/20 JKH	Review/analyze Beechwood - review SHIP RFAs	1.30	396.50
01/03/20 JKH	Review/analyze Beechwood - review draft response to RFAs	.70	213.50
01/03/20 JKH	Correspondence Beechwood - prepare email summary to ASH re: possible responses for RFAs	.60	183.00
01/03/20 WMM	Legal services/Client Receive and review Saks errata sheet and compare to transcript.	.90	805.50

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01/03/20 WMM	Legal services/Legal Papers Receive and review J. Rakoff order to PPVA to file brief concerning sanctions and communications concerning same.	.70	626.50
01/03/20 WMM	Legal services/Legal Papers Reviewing RFAs and rules concerning same; communications concerning responses to same	2.60	2,327.00
01/03/20 WMM	Legal services/Legal Papers Receive and review Wegner errata sheet and compare to transcript.	.80	716.00
01/04/20 ASH	Examine Documents Analyze numerous account statements from Wilmington Trust relating to assignments; participations and holdings in Desert Hawk and Northstar	3.30	2,557.50
01/04/20 ASH	Correspondence w/CoCounsel - Other to Trey Rogers regarding factual issue; to Mary Jane Constant regarding factual issues	.40	310.00
01/04/20 ASH	Preparation of Ans. to req. for adm. Prepare the Receiver's Response to SHIP First Set of Requests for Admission Directed to the Receiver	1.50	1,162.50

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01/04/20	ASH	Research re Ans. to req. for admission Legal research regarding the Receiver's Responses to SHIP's First Set of Requests for Admission Directed to the Receiver	.70	542.50
01/04/20	JKH	Review/analyze Beechwood - Review of Adler transcript	2.20	671.00
01/04/20	JKH	Review/analyze Beechwood - review of Hart transcript	1.40	427.00
01/05/20	ASH	Analysis of Deposition Analyze deposition transcript excerpts regarding factual issues as relevant to responses to requests for admissions	2.10	1,627.50
01/05/20	ASH	Preparation of Ans. to req. for adm. the Receiver's Responses to SHIP's First Set of Requests for Admission	2.60	2,015.00
01/05/20	ASH	Examine Documents Analyze assignments and account statements regarding transfers of assets and funds to and from numerous Beechwood; SHIP and other entities	1.50	1,162.50
01/05/20	JKH	Review/analyze Beechwood - review of Feuer (day 2) transcript	2.50	762.50

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01/06/20	ASH	Conference(s) w/ CoCounsel - Other WMM; EBW; GSL and Brent Weisenberg regarding RFAs	1.40	1,085.00
01/06/20	ASH	Preparation of Ans. to req. for adm. Revise and finalize responses to requests for admission.	4.50	3,487.50
01/06/20	ASH	Analysis of Deposition transcript Analyze portions of deposition transcripts regarding factual issues	2.80	2,170.00
01/06/20	ASH	Examine Documents Analyze documents relating to responses to requests for admission	1.30	1,007.50
01/06/20	EBW	Correspondence Beechwood - correspondence with adversaries regarding post-discovery issues.	.20	161.00
01/06/20	EBW	Analysis of Legal Papers Beechwood - review of responses to requests for admission.	2.30	1,851.50
01/06/20	EBW	Conference(s) In Office Beechwood - conference with litigation team regarding status and strategy; including responses to requests for admission. (EBW Portion)	2.50	2,012.50

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01/06/20 ACS	Review/correct Resp to disc. device Edit responses to SHIP RFAs	.80	728.00
01/06/20 GSL	Preparation of Correspondence Preparation of Letter to D. Benhaim - re Beechwood's Response to RFAs	1.20	432.00
01/06/20 GSL	Research re Correspondence Research - re Sufficiency of Response to RFAs	.30	108.00
01/06/20 GSL	Conference(s) re Ans. to req. Platinum-Beechwood Meeting - re Reponse to SHIP RFAs	1.60	576.00
01/06/20 GSL	Research re Court Reviewed/summarized Rakoff's individual rules - re trial prep	.70	252.00
01/06/20 GSL	Review/correct Ans. to req. for adm.	.40	144.00
01/06/20 JKH	Correspondence Beechwood - prepare email summary to ASH of additional possible responses to SHIP RFAs	.60	183.00
01/06/20 JKH	Review/analyze Beechwood - review of Christian Thomas deposition	2.60	793.00

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01/06/20	JKH	Review/analyze Beechwood - continued review of Feuer (day 2) transcript	1.40	427.00
01/06/20	JKH	Review/analyze Beechwood - review of draft responses to SHIP RFAs	.40	122.00
01/06/20	JKH	Review/analyze Beechwood - profiling multiple transcripts and exhibits	.60	183.00
01/06/20	JKH	Review/analyze Beechwood - review of Narain transcript	.70	213.50
01/06/20	WMM	Legal services/Client Communications among counsel and team concerning application to adjust SJ schedule.	.50	447.50
01/06/20	WMM	Legal services/Legal Papers Communications concerning RFA responses and letter to Beechwood counsel concerning same; reviewing same.	1.80	1,611.00
01/06/20	WMM	Legal services/Client Team meeting concerning responses to RFAs; motions for SJ and potential settlement; follow-up communications concerning Rakoff rules for SJ. (WMM Portion)	2.80	2,506.00

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01/06/20 WMM	Legal services/Legal Papers Review draft of circumstantial evidence argument and revise same.	2.20	1,969.00
01/07/20 EBW	Preparation for Conference Beechwood - preparation for settlement discussions; including case status memo.	3.10	2,495.50
01/07/20 EBW	Conference(s) In Office Beechwood - conference with receiver regarding settlement.	1.50	1,207.50
01/07/20 EBW	Analysis of Legal Papers Beechwood - review of responses to requests for admission.	.30	241.50
01/07/20 EBW	Telephone Call(s) Beechwood - teleconference with court and other counsel regarding scheduling.	.40	322.00
01/07/20 JKH	Review/analyze Beechwood - review and organize hard copy exhibits from depositions	1.70	518.50
01/07/20 JKH	Correspondence Beechwood - preparing and editing errata/transcript letters for Huberfeld and Hart	.30	91.50

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/07/20	JKH	Review Documents Beechwood - review of Serio transcript and exhibits	.30	91.50
01/07/20	JKH	Diary & Docket Review of email re rescheduling of hearing and calendaring same	.10	30.50
01/07/20	JKH	Document Review Document review related to transactions	2.30	701.50
01/07/20	JKH	Review/analyze Beechwood - review of amended complaint re: certain transactions	.60	183.00
01/07/20	WMM	Legal services/Legal Papers Review deposition exhibits from reporter and communications concerning filing.	.90	805.50
01/07/20	WMM	Legal services/Legal Papers Review draft settlement memo and communications concerning revisions and memo to MLC.	.80	716.00
01/07/20	WMM	Legal services/Legal Papers Communications concerning SHIP responses to RFAs and analyzing same.	2.50	2,237.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/07/20 WMM	Legal services/Client Prepare for and participate in team meeting in prep for settlement conference; and follow-up communications for next steps. (WMM Portion)	2.70	2,416.50
01/07/20 WMM	Legal services/Client Communications concerning court conference to adjust schedule and receive ruling from Court.	.80	716.00
01/08/20 EBW	Preparation of Memorandum Beechwood - preparation of status memo.	1.20	966.00
01/08/20 EBW	Telephone Call(s) Beechwood - teleconference with Receiver and SHIP.	.70	563.50
01/08/20 EBW	Analysis of Legal Papers Beechwood - attention to summary judgment issues.	2.10	1,690.50
01/08/20 EBW	Telephone Call(s) Beechwood - teleconferences with Goldin regarding status and strategy.	.90	724.50
01/08/20 EBW	Telephone Call(s) Beechwood - teleconference with B. Weisenberg regarding strategy.	.20	161.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/08/20 GSL	Preparation of Correspondence Letters to DLA - errata sheets for Hampton and Bowler	.60	216.00
01/08/20 JKH	Correspondence Beechwood - prepare email to US legal requesting list of depositions taken	.20	61.00
01/08/20 JKH	Review Documents Beechwood - review of Brian Jedwab transcript and exhibits	.30	91.50
01/08/20 JKH	Review Documents Beechwood - review of Jedwab transcript and exhibits	.30	91.50
01/08/20 JKH	Review/analyze Beechwood - review of Christian Thomas transcript	1.30	396.50
01/08/20 WMM	Legal services/Legal Papers Review settlement memo and communications concerning changes.	.80	716.00
01/08/20 WMM	Legal services/Client Prepare for and participate in settlement conference; communications concerning same.	1.70	1,521.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/08/20 WMM	Legal services/Client Analysis of potential damages and circumstantial evidence argument.	1.80	1,611.00
01/09/20 ASH	Conference(s) w/ CoCounsel - Other Meeting with EBW; ACS; WMM; GSL and Brent Weisenberg regarding status and next steps (ASH Portion)	1.50	1,162.50
01/09/20 ASH	Correspondence w/CoCounsel - Other Analyze IMAs; email to Brent Weisenberg regarding same	.30	232.50
01/09/20 EBW	Preparation for Conference Beechwood - preparation for litigation strategy session.	1.00	805.00
01/09/20 EBW	Conference(s) In Office Beechwood - litigation strategy session. (EBW Portion)	1.00	805.00
01/09/20 EBW	Reviewed Transcript of Exam. Beechwood - review and analysis of deposition transcripts.	3.70	2,978.50
01/09/20 GSL	Conference(s) in Office Beechwood Team Meeting - next steps (GSL Portion)	1.10	396.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/09/20	GSL	Analysis/Strategy Research - re motion to determine sufficiency of response to RFAs	1.80	648.00
01/09/20	GSL	Review file re Deposition Review of Serio Deposition Transcript - re supplemental document requests	.50	180.00
01/09/20	JKH	Conference(s) in Office Beechwood - team meeting to discuss next steps (JKH Portion)	1.00	305.00
01/09/20	JKH	Correspondence Beechwood - prepare email to H&K re: transcripts	.30	91.50
01/09/20	JKH	Review Documents Beechwood - review list of depositions taken and prepare list of transcripts needed	.40	122.00
01/09/20	JKH	Correspondence Beechwood - correspondence with US legal re: transcripts	.20	61.00
01/09/20	JKH	Correspondence Beechwood - reply email to Huberfeld counsel attaching transcript	.10	30.50
01/09/20	JKH	Review/analyze Beechwood - review of assignments	2.30	701.50

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01/09/20	JKH	Review Documents Beechwood - review of Huberfeld transcript and exhibits	.30	91.50
01/09/20	JKH	Prepare Legal Papers Beechwood - preparing electronic copies of relevant transcripts for team	.40	122.00
01/09/20	JKH	Review/analyze Beechwood - review of Bodner transcript	.30	91.50
01/09/20	WMM	Legal services/Client Analyzing agency issue for SJ and review IMA language; communications concerning same.	1.70	1,521.50
01/09/20	WMM	Legal services/Client Prepare for and participate in team meeting concerning next steps; communications concerning deposition review and follow up concerning RFAs. (WMM Portion)	2.80	2,506.00
01/10/20	ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with Brent Weisenberg and counsel for the Wilmington Trusts regarding documents or certifications needed and potential settlement	.50	387.50

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01/10/20 ASH	Examine Documents Analyze lien searches; UCC financing statements and related correspondence to ascertain what parties hold liens; correspondence with EBW and Brent Weisenberg regarding termination statements required for any settlement	2.80	2,170.00
01/10/20 EBW	Conference(s) In Office Beechwood - conferences with B. Weisenberg regarding status and strategy and settlement.	2.10	1,690.50
01/10/20 EBW	Reviewed Transcript of Exam. Beechwood - review of transcripts in preparation for summary judgment and attention to related issues.	2.50	2,012.50
01/10/20 GSL	Preparation of Correspondence Letter to DLA - re Serio supplemental document requests	1.70	612.00
01/10/20 GSL	Research re Memorandum Research - re SJ papers	2.10	756.00
01/10/20 GSL	Analysis/Strategy Research - re damages	2.00	720.00
01/10/20 JKH	Review/analyze Beechwood - analysis of note purchase agreements and related account statements	2.70	823.50

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01/10/20 JKH	Correspondence Beechwood - prepare letter to Bodner counsel re: confidential portion of transcript	.60	183.00
01/10/20 WMM	Legal services/Legal Papers Review letter to Benheim and communications concerning same.	.50	447.50
01/10/20 WMM	Legal services/Client Participate in Platinum meeting concerning settlement status and unjust enrichment argument; follow-up communications concerning same. (WMM Portion)	1.70	1,521.50
01/10/20 WMM	Legal services/Client Analyzing unjust enrichment claim in amended complaint and numbers from expert report; draft argument for same.	3.50	3,132.50
01/10/20 WMM	Legal services/Legal Papers Review letter concerning Serio deposition document request and communications concerning same.	.50	447.50
01/11/20 ASH	Review/correct Settlement Agreement Settlement agreement with certain Defendants	1.30	1,007.50
01/12/20 ASH	Review/correct Settlement Agreement Settlement agreement with certain Defendants	2.10	1,627.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/12/20 ASH	Analysis of Legal Papers secured lenders' SHIP lien documents; email to Phil Berg regarding same	.40	310.00
01/12/20 GSL	Analysis/Strategy Damages research	1.20	432.00
01/13/20 ASH	Conference(s) w/ CoCounsel - Other With EBW; Brent Weisenberg; WMM and GSL regarding settlement; status and tasks (ASH Portion)	1.00	775.00
01/13/20 ASH	Preparation of Legal Papers Prepare detailed analysis of Northstar; Desert Hawk and LC Energy assignments; participations and payments; analyze documents regarding same	2.50	1,937.50
01/13/20 ASH	Analysis of Legal Papers Chart of \$69 million loan; assignments and participation; meeting with Brent Weisenberg regarding same	.30	232.50
01/13/20 ASH	Memorandum to CoCounsel - Other to internal team regarding Wilmington Trust deposition	.30	232.50
01/13/20 ASH	Memorandum to CoCounsel - Other Regarding unjust enrichment claims	1.30	1,007.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/13/20 EBW	Conference(s) In Office Beechwood - conference with litigation team regarding strategy. (EBW Portion)	1.00	805.00
01/13/20 GSL	Analysis/Strategy Damages - re research summary	.30	108.00
01/13/20 GSL	Conference(s) in Office Platinum-Beechwood Team Meeting - re damages (GSL Portion)	1.00	360.00
01/13/20 GSL	Research re Memorandum Research - re summary judgment papers	1.40	504.00
01/13/20 GSL	Correspondence w/CoCounsel - Other Correspondence with Cayman counsel	.40	144.00
01/13/20 JKH	Review/analyze Beechwood - review and organize Wilmington Trust account statements	3.40	1,037.00
01/13/20 JKH	Review/analyze Beechwood - continued review of Wilmington Trust statements	2.30	701.50
01/13/20 WMM	Legal services/Client Team meeting concerning next steps and unjust enrichment arguments; review caselaw analysis of same; continue analysis with counter-arguments communications.	3.20	2,864.00

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01/13/20 WMM	Legal services/Client Reviewing updated spreadsheets and related assignments from Beechwood's counsel; and review table concerning same.	.50	447.50
01/13/20 WMM	Legal services/Client Review and analyze civil conspiracy analysis as set forth in J. Rakoff's decision in SHIP action.	.70	626.50
01/13/20 WMM	Legal services/Client Attention to chart of percentage ownership of debt and communications concerning same and strategy.	.50	447.50
01/13/20 WMM	Legal services/Legal Papers Analyze Court's decision on sanctions issue with H&K and communications concerning same.	.80	716.00
01/13/20 WMM	Legal services/Legal Papers Reviewing draft settlement agreement.	.70	626.50
01/14/20 EBW	Telephone Call(s) PPVA - teleconference with PPVA's counsel regarding items of mutual concern.	.40	322.00
01/14/20 GSL	Analysis/Strategy Review of Beechwood Re bankruptcy docket	.70	252.00

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01/14/20 GSL	Attendance at Deposition Wilmington Trust/David Young Deposition via telephone	1.20	432.00
01/14/20 GSL	Research re Memorandum Continued research - re summary judgment papers	4.50	1,620.00
01/14/20 JKH	Review/analyze Beechwood - review of Northwood transcript and prepare digest of same	2.10	640.50
01/14/20 JKH	Review/analyze Beechwood - continued review of wilmington trust statements	1.90	579.50
01/14/20 WMM	Legal services/Legal Papers Communications concerning draft MLC affidavit and potential settlement with other defendants;	1.50	1,342.50
01/14/20 WMM	Legal services/Legal Papers Review letter from DLA concerning Serio deposition document requests amd communications concerning same.	.50	447.50
01/14/20 WMM	Legal services/Legal Papers Analyzing Wegner deposition for excerpts to use in SJ motions.	2.00	1,790.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/15/20 ASH	Conference(s) w/ CoCounsel - Other Meeting with Brent Weisenberg; Trey Rogers; WMM; EBW and GSL regarding strategy for Beechwood case and settlement negotiations (ASH Portion)	.80	620.00
01/15/20 ASH	Analysis of Correspondence Letters from counsel for SHIP regarding discovery; email to internal team regarding same	.30	232.50
01/15/20 ASH	Analysis of Correspondence Analyze documents previously produced by the Receiver for possible responsiveness to letter from SHIP; telephone with JKH regarding same	.30	232.50
01/15/20 EBW	Correspondence Beechwood - review of correspondence with adversaries regarding discovery.	.60	483.00
01/15/20 EBW	Conference(s) In Office Beechwood - litigation strategy session with litigation team. (EBW portion).	2.80	2,254.00
01/15/20 EBW	Reviewed Transcript of Exam. Beechwood - review of deposition transcripts.	.80	644.00
01/15/20 ACS	Conference(s) w/ CoCounsel - Other Meet with EBW; WM; GSL; B Weisenberg and T Rogers re Beechwood strategy (ACS Portion)	.50	455.00

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01/15/20	GSL	Preparation of Memorandum Continued research - re summary judgment papers	.70	252.00
01/15/20	GSL	Conference(s) in Office Platinum-Beechwood Team Meeting (GSL Portion)	2.60	936.00
01/15/20	GSL	Analysis/Strategy Prepared summary of main points - re Platinum Beechwood team meeting	1.20	432.00
01/15/20	JKH	Correspondence Beechwood - review letter from SHIP re: document requests	.20	61.00
01/15/20	JKH	Document Review Beechwood - document searches re: SHIP's doc requests	1.20	366.00
01/15/20	JKH	Review/analyze Beechwood - review and analysis of A. Northwood deposition	.60	183.00
01/15/20	JKH	Review/analyze Beechwood - review of PBIHL 30(b) (6) transcript	1.40	427.00

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01/15/20 WMM	Legal services/Client Prepare for and participate in team meeting concerning clawback claims; unjust enrichment and next steps. (WMM portion)	1.50	1,342.50
01/15/20 WMM	Legal services/Client Communications concerning DLA position on Serio documents and review same.	.70	626.50
01/15/20 WMM	Legal services/Legal Papers Review draft affidavit sent to SEC and communications concerning same.	1.30	1,163.50
01/15/20 WMM	Legal services/Legal Papers Analysis of settlement discussion points and communications concerning same.	.50	447.50
01/15/20 WMM	Legal services/Client Continue analysis of Wegner deposition for excerpts to use at SJ.	3.50	3,132.50
01/16/20 ASH	Review/correct Settlement Agreement Settlement agreement with certain Defendants	1.40	1,085.00
01/16/20 EBW	Reviewed Transcript of Exam. Beechwood - review of deposition transcripts.	3.80	3,059.00
01/16/20 EBW	Analysis of Legal Papers Beechwood - attention to strategy issues.	1.10	885.50

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01/16/20	GSL	Review file re Deposition Reviewed rough deposition transcript - re Wilmington Trust deposition	.50	180.00
01/16/20	GSL	Research re Correspondence Research -- re fraudulent conveyance	1.40	504.00
01/16/20	GSL	Review file re Deposition Reviewed Hampton and Bowler deposition transcripts - re DLA correspondence	1.30	468.00
01/16/20	GSL	Correspondence w/CoCounsel - Other Correspondence with Cayman counsel	.10	36.00
01/16/20	JKH	Correspondence Beechwood - preparing emails to various parties re: executed transcripts	.40	122.00
01/16/20	JKH	Correspondence Beechwood - email communications with T. Rogers re: SHIP doc request	.30	91.50
01/16/20	JKH	Document Review Beechwood - document searches related to SHIP doc request	1.80	549.00
01/16/20	JKH	Review/analyze Beechwood - continued review and summary of A. Northwood transcript and exhibits	3.20	976.00

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01/16/20	JKH	Correspondence Beechwood - email communications with Relativity re: additional production	.20	61.00
01/16/20	JKH	Review/analyze Beechwood - review of T. Rogers transcript in connection with SHIP doc request	.50	152.50
01/17/20	ASH	Telephone Call(s) w/Client Attend a portion of meeting with MLC; Trey Rogers and ACS regarding Beechwood case	.20	155.00
01/17/20	ASH	Research re Legal Papers Agency issues	.30	232.50
01/17/20	EBW	Conference(s) In Office Beechwood - conference with Receiver and litigation team regarding strategy.	.80	644.00
01/17/20	EBW	Preparation for Conference Beechwood - preparation for strategy session with receiver.	1.20	966.00
01/17/20	EBW	Correspondence Beechwood - preparation of correspondence to SHIP.	1.10	885.50
01/17/20	EBW	Reviewed Transcript of Exam. Beechwood - review of deposition transcripts.	2.50	2,012.50

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01/17/20	ACS	Conference(s) w/ CoCounsel - Other Meet with Receiver; EBW; WM and T Rogers re strategy (ACS Portion)	.80	728.00
01/17/20	WMM	Legal services/Client Communications concerning Serio document production dispute and review correspondence.	.80	716.00
01/17/20	WMM	Legal services/Client Prepare for and participate in team meeting concerning potential settlement and strategy; and follow up communications concerning same. (WMM Portion)	1.80	1,611.00
01/17/20	WMM	Legal services/Client Communications concerning H&K pleading and Navidea funds; and review same.	.80	716.00
01/18/20	ASH	Research re Brief for motion Legal research regarding agency	1.40	1,085.00
01/19/20	GSL	Review file re Deposition Reviewed deposition transcript summaries - re correspondence with SHIP	.80	288.00
01/20/20	ASH	Preparation of Rule 56.1 Statement Prepare Rule 56.1 Statement in Support of Motion for Summary Judgment	3.50	2,712.50

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01/21/20 ASH	Correspondence w/Adversary Letter to defendants' counsel regarding facts and law supporting case	1.70	1,317.50
01/21/20 ASH	Examine Documents Analyze documents regarding factual issues relating to motions for summary judgment	1.20	930.00
01/21/20 ASH	Analysis of Legal Papers Documents regarding amount of alleged debt to lenders; emails with Trey Rogers regarding same	.30	232.50
01/21/20 EBW	Correspondence Beechwood - preparation of correspondence to SHIP.	1.80	1,449.00
01/21/20 EBW	Reviewed Transcript of Exam. Beechwood - review of deposition transcripts.	3.40	2,737.00
01/21/20 EBW	Correspondence Beechwood - correspondence with adversaries and team regarding outstanding discovery issues	.80	644.00
01/21/20 GSL	Preparation of Correspondence Preparation of letter to SHIP - re Serio deposition supplemental requests	2.70	972.00

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01/21/20	JKH	Review/analyze Beechwood - review Bodner errata sheet and prepare brief email summary	.40	122.00
01/21/20	JKH	Correspondence Beechwood - prepare email summary re: responses to SHIP doc requests	.60	183.00
01/21/20	JKH	Review/analyze Beechwood - review EBW annotations re: Serio deposition	1.10	335.50
01/21/20	WMM	Legal services/Legal Papers Drafting settlement letter and communications concerning same.	1.10	984.50
01/21/20	WMM	Legal services/Legal Papers Analyzing choice quotes from testimony for use in SHIP settlement letter.	.90	805.50
01/21/20	WMM	Legal services/Client Review draft letter to DLA concerning discovery controversy.	.50	447.50
01/22/20	ASH	Correspondence w/Adversary to counsel regarding settlement; analyze documents regarding same	2.20	1,705.00
01/22/20	EBW	Reviewed Transcript of Exam. Beechwood - analysis of deposition transcripts.	4.10	3,300.50

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01/22/20	EBW	Correspondence Beechwood - correspondence with adversaries regarding discovery issues.	.70	563.50
01/22/20	EBW	Correspondence Beechwood - preparation of correspondence to SHIP.	.80	644.00
01/22/20	GSL	Research re Memorandum Continued research - re motion for summary judgment legal framework	1.60	576.00
01/22/20	JKH	Review/analyze Beechwood - review EBW annotations to Serio deposition and prepare deposition digest	3.30	1,006.50
01/22/20	JKH	Review/analyze Beechwood - review and summarize Alexis Northwood deposition	1.30	396.50
01/22/20	JKH	Review/analyze Beechwood - review of Wilmington Trust statements	.40	122.00
01/22/20	WMM	Legal services/Legal Papers Continue drafting settlement letter and communications concerning same.	.80	716.00
01/22/20	WMM	Legal services/Legal Papers Continue reviewing Wegner deposition for excerpts to summarize for SJ motions.	3.10	2,774.50

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01/22/20 WMM	Legal services/Legal Papers Reviewing Staldine deposition for SJ excerpts.	2.40	2,148.00
01/23/20 ASH	Review/correct Settlement Agreement Settlement agreement; emails to Brent Weisenberg regarding same; review related documents; emails with Brent Weisenberg regarding same	.60	465.00
01/23/20 ASH	Examine Documents Rescission analysis; meetings JKH regarding letter from opposing counsel regarding issues relating to letter from opposing counsel regarding portion of letter regarding rescission analysis	.40	310.00
01/23/20 ASH	Preparation of e-mail(s) to Trey Rogers regarding deposition and exhibits	.20	155.00
01/23/20 EBW	Correspondence Beechwood - preparation of discovery correspondence with adversaries.	1.20	966.00
01/23/20 EBW	Reviewed Transcript of Exam. Beechwood - review of deposition transcripts.	3.00	2,415.00
01/23/20 GSL	Research re Memorandum Continued research - re motion for summary judgment legal framework	2.40	864.00

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01/23/20 GSL	Preparation of Memorandum Prepared summary of research - re motion for summary judgment	4.30	1,548.00
01/23/20 JKH	Document Review Beechwood - additional document searches re: SHIP supplemental document request	2.80	854.00
01/23/20 JKH	Correspondence Beechwood - email communications with T. Rogers re: SHIP's supplemental document requests	.40	122.00
01/23/20 JKH	Conference(s) in Office Beechwood - discussion with ASH re: SHIP's supplemental document request	.30	91.50
01/23/20 JKH	Draft/revise Beechwood - draft/edit response letter to SHIP re: supplemental document request	1.50	457.50
01/23/20 JKH	Review/analyze Continued review and summarization of Northwood deposition	.70	213.50
01/23/20 WMM	Legal services/Legal Papers Review draft SHIP letter concerning settlemet and review same; communications concerning same.	.80	716.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/23/20 WMM	Legal services/Legal Papers Continue analysis of Staldine deposition for SJ motions.	6.00	5,370.00
01/24/20 ASH	Examine Documents Analyze assignment agreements for Northstar; Desert Hawk and LC Energy shares; documents regarding ownership of PPCO Loan; account statements regarding flows of funds; documents relating to rescission claims and prior productions; application to retain Goldin and Goldin retention letters	2.20	1,705.00
01/24/20 ASH	Review/correct Correspondence Letter regarding possible settlement; three letters to counsel for SHIP regarding discovery requested from the Receiver and discovery requested by the Receiver to SHIP	1.50	1,162.50
01/24/20 ASH	Conference(s) w/ CoCounsel - Other EBW; Brent Weisenberg and Trey Rogers regarding letter to the SHIP Receiver	.60	465.00
01/24/20 ASH	Telephone Call(s) w/CoCounsel - Other With Alois Chakabva regarding issues relating to letter to SHIP receiver	.20	155.00
01/24/20 ASH	Correspondence w/CoCounsel - Other to Will Edwards regarding facts regarding letter to counsel for SHIP regarding Receiver's production	.20	155.00

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01/24/20 ASH	Correspondence w/CoCounsel - Other with Trey Rogers regarding rescission claims	.20	155.00
01/24/20 EBW	Correspondence Beechwood - preparation of correspondence with SHIP.	4.80	3,864.00
01/24/20 EBW	Reviewed Transcript of Exam. Beechwood - review of transcripts and attention to summary judgment issues.	2.60	2,093.00
01/24/20 GSL	Preparation of Memorandum Continued preparing summary of research - re motion for summary judgment legal framework	5.70	2,052.00
01/24/20 GSL	Preparation of Correspondence Prepared letters to SHIP - re deposition correspondence	1.80	648.00
01/24/20 GSL	Review file re Deposition Reviewed deposition transcripts for citations - re correspondence	1.70	612.00
01/24/20 JKH	Review Documents Beechwood - review documents related to letter re: Prager deposition	.80	244.00

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01/24/20	JKH	Document Review Beechwood - document review related to SHIP's supplemental document request	1.60	488.00
01/24/20	JKH	Draft/revise Beechwood - review and edit response letter to SHIP's supplemental document request	.70	213.50
01/24/20	JKH	Review/analyze Beechwood - continued review and summarization of Northwood deposition	1.80	549.00
01/24/20	WMM	Legal services/Legal Papers Review revised draft letter regarding settlement and communications concerning same.	1.20	1,074.00
01/24/20	WMM	Legal services/Legal Papers Continue review of Staldine deposition and drafting summaries of excerpts.	1.80	1,611.00
01/24/20	WMM	Legal services/Legal Papers Analyzing Robison deposition for SJ excerpts.	4.00	3,580.00
01/25/20	ASH	Examine Documents Analyze documents relating to motion for partial summary judgment against Senior Health Insurance Company of Pennsylvania	1.20	930.00

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01/27/20	ASH	Conference(s) w/ CoCounsel - Other Meeting with EBW; Brent Weisenberg; GSL and Trey Rogers regarding motions for summary judgment (ASH Portion)	1.00	775.00
01/27/20	EBW	Conference(s) In Office Beechwood - strategy session with litigation team regarding summary judgment. (EBW Portion).	1.80	1,449.00
01/27/20	EBW	Reviewed Transcript of Exam. Beechwood - review of transcripts.	3.80	3,059.00
01/27/20	EBW	Correspondence Beechwood - correspondence with SHIP.	.90	724.50
01/27/20	GSL	Conference(s) in Office Platinum-Beechwood team meeting - re motions for summary judgment (GSL Portion)	.90	324.00
01/27/20	GSL	Research re Memorandum Research - re fraudulent conveyance claims	3.20	1,152.00
01/27/20	JKH	Correspondence Beechwood - prepare cover letter enclosing PBIHL transcript	.20	61.00
01/27/20	JKH	Diary & Docket Beechwood - calendar calls and deadlines	.10	30.50

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01/27/20	WMM	Legal services/Client Prepare for and participate in team meeting concerning SJ motions. (WMM Portion)	1.90	1,700.50
01/27/20	WMM	Legal services/Legal Papers Continue reviewing Robison deposition and drafting summaries of excerpts.	3.50	3,132.50
01/27/20	WMM	Legal services/Legal Papers Reviewing revised draft SHIP letter and communications concerning same.	1.50	1,342.50
01/28/20	ASH	Analysis of Deposition transcript Analyze transcripts of depositions of Mark Feuer and David Young	1.50	1,162.50
01/28/20	ASH	Analysis of Legal Papers Analyze deposition exhibits as related to motions for partial summary judgment	.50	387.50
01/28/20	ASH	Preparation of Legal Papers Prepare motion for partial summary judgment	1.10	852.50
01/28/20	EBW	Telephone Call(s) Beechwood - preparation for teleconference with SHIP re discovery.	.40	322.00
01/28/20	EBW	Telephone Call(s) Beechwood - teleconference with SHIP re: discovery.	.30	241.50

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01/28/20	EBW	Correspondence Beechwood - correspondence with SHIP.	.20	161.00
01/28/20	EBW	Correspondence Beechwood - correspondence with Beechwood regarding RFAs.	.40	322.00
01/28/20	EBW	Reviewed Transcript of Exam. Beechwood - review of transcripts.	4.10	3,300.50
01/28/20	GSL	Preparation of Memorandum Prepared draft memorandum of law - re motion for summary judgment	4.60	1,656.00
01/28/20	GSL	Telephone Call(s) w/Adversary Correspondence/call with David Benhaim - re RFAs	1.10	396.00
01/28/20	GSL	Telephone Call(s) w/Adversary Call with SHIP - re Serio deposition supplemental document requests	.30	108.00
01/28/20	GSL	Review file re Deposition Review of Wegner deposition/exhibits - re Serio supplemental document requests	2.00	720.00
01/28/20	JKH	Review/analyze Beechwood - review Feuer transcript markup	1.30	396.50

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01/28/20	WMM	Legal services/Client Communications concerning depositions to be obtained and review of list.	.60	537.00
01/28/20	WMM	Legal services/Legal Papers Revise summaries of Wegner and Staldine depositions.	2.00	1,790.00
01/28/20	WMM	Legal services/Legal Papers Continue analysis of Robison Day 1 deposition and drafting excerpt summaries.	4.50	4,027.50
01/29/20	ASH	Preparation of Legal Papers Prepare Rule 56.1 statement in support of motion for partial summary judgment	4.60	3,565.00
01/29/20	ASH	Analysis of Deposition Analyze deposition testimony of witnesses	2.10	1,627.50
01/29/20	EBW	Legal Research Beechwood - review of legal research.	1.20	966.00
01/29/20	EBW	Correspondence Beechwood - correspondence with adversaries.	.80	644.00
01/29/20	EBW	Reviewed Transcript of Exam. Beechwood - review of transcripts.	4.20	3,381.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/29/20	GSL	Research re Trial Legal/equitable claims - re questions for the jury/judge	1.50	540.00
01/29/20	GSL	Research re Memorandum Research - re agency/fraudulent conveyance	1.50	540.00
01/29/20	GSL	Review/correct Memorandum memorandum of law - re motion for summary judgment	4.40	1,584.00
01/29/20	JKH	Review/analyze Beechwood - review Staldine transcript summary	.30	91.50
01/29/20	JKH	Review/analyze Beechwood - review of Wegner transcript analysis	.40	122.00
01/29/20	JKH	Prepare Chart(s) Beechwood - prepare chart of all depositions; exhibits and assignments for review	1.60	488.00
01/29/20	JKH	Review/analyze Beechwood - review; profile and save E. Beren transcript	.20	61.00
01/29/20	JKH	Review/analyze Beechwood - review; profile and save J. Beren transcript and exhibits	.30	91.50

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01/29/20 JKH	Review/analyze Beechwood - review; profile and save J. Rechnitz transcript and exhibits	.30	91.50
01/29/20 WMM	Legal services/Client Communications concering Serio document issue.	.50	447.50
01/29/20 WMM	Legal services/Client Communications concerning status of summaries of Wegner and Staldine depositions.	.50	447.50
01/29/20 WMM	Legal services/Legal Papers Continue reviewing Robison deposition and drafting summaries of excepts.	3.80	3,401.00
01/30/20 ASH	Preparation of Legal Papers Rule 56.1 statement in support of motion for partial summary judgment	3.10	2,402.50
01/30/20 ASH	Analysis of Deposition transcript Deposition testimony of SHIP and Beechwood witnesses and summaries thereof	2.30	1,782.50
01/30/20 ASH	Analysis of Brief for motion analyze draft of memorandum of law in support of motion for partial summary judgment	.90	697.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/30/20 EBW	Telephone Call(s) Beechwood - teleconference with SHIP's counsel regarding discovery issues.	.20	161.00
01/30/20 EBW	Analysis of Legal Papers Beechwood - attention to SHIP issues.	1.60	1,288.00
01/30/20 EBW	Reviewed Transcript of Exam. Beechwood - review of transcripts and attention to summary judgment issues.	3.90	3,139.50
01/30/20 GSL	Preparation of Memorandum memorandum of law - re motion for summary judgment	.50	180.00
01/30/20 GSL	Analysis of Deposition transcript Review of deposition transcripts - re summary judgment motions	4.40	1,584.00
01/30/20 GSL	Research re Memorandum Continued research - re motions for summary judgment	1.90	684.00
01/30/20 GSL	Analysis of Complaint Re SHIP Complaint	.90	324.00
01/30/20 JKH	Review/analyze Beechwood - review; profile and save all remaining deposition transcripts and exhibits	4.50	1,372.50

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01/30/20 JKH	Prepare Chart(s) Beechwood - continued preparation of list of all depositions; exhibits and assignments for review	.40	122.00
01/30/20 JKH	Review/analyze Beechwood - review of Wilmington Trust statements; sending same via email to ASH	.20	61.00
01/30/20 WMM	Legal services/Legal Papers Analyzing Lorenz deposition for excerpt summaries.	5.50	4,922.50
01/31/20 ASH	Preparation of Legal Papers Rule 56.1 Statement in support of motion for partial summary judgment	1.60	1,240.00
01/31/20 ASH	Analysis of Correspondence from counsel for SHIP; email to team regarding proposed response to correspondence from SHIP regarding documents	.20	155.00
01/31/20 EBW	Analysis of Legal Papers Beechwood - attention to outstanding discovery issues.	.40	322.00
01/31/20 EBW	Analysis of Legal Papers Beechwood - review of Bodner supplemental report.	.40	322.00

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01/31/20	EBW	Correspondence Beechwood - correspondence with SHIP's receiver.	.30	241.50
01/31/20	GSL	Preparation of Memorandum Memorandum of law - re motion for summary judgment	1.80	648.00
01/31/20	JKH	Review/analyze Beechwood - review draft motion for summary judgment	.80	244.00
01/31/20	JKH	Review/analyze Beechwood - review; analyze and profile Wilmington Trust transcript and exhibits	.30	91.50
01/31/20	JKH	Review/analyze Beechwood - review; analyze and summarize A. Northwood transcript and exhibits	2.30	701.50
01/31/20	JKH	Review/analyze Beechwood - review and summarize transcript markups re: Feuer (day 1)	1.20	366.00
01/31/20	WMM	Legal services/Client Communications concerning Serio deposition document agreement with DLA.	.50	447.50
01/31/20	WMM	Legal services/Legal Papers Reviewing supplemental report from PPVA.	1.00	895.00

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01/31/20 WMM	Legal services/Legal Papers Review stipulation of dismissal of Cassidy and Michael Nordlicht and communications concerning same.	.50	447.50
01/31/20 WMM	Legal services/Legal Papers Continue review of Lorentz deposition.	4.00	3,580.00
02/01/20 ASH	Preparation of Legal Papers Prepare Rule 56.1 statement in support of motion for partial summary judgment; analyze documents regarding same	1.80	1,395.00
02/01/20 ASH	Analysis of Deposition transcript Transcripts of deposition of Wilmington Trust; Mark Feuer; Dhruv Narain and Brian Wegner and exhibits thereto	1.50	1,162.50
02/02/20 ASH	Review File re: Proof of Claim Proofs of Claim filed by Beechwood and SHIP	1.20	930.00
02/02/20 ASH	Analysis of Legal Papers Statements of account from Wilmington Trust; documents regarding the PPCO Loan Transactions and Securities Purchases	2.10	1,627.50
02/02/20 ASH	Preparation of Legal Papers Rule 56.1 statement in support of motion for summary judgment	2.60	2,015.00

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02/03/20 ASH	Preparation of Legal Papers Rule 56.1 Statement in support of possible motion for summary judgment	3.10	2,402.50
02/03/20 ASH	Examine Documents Analyze exhibits to depositions of Wilmington Trust; Dhruv Narain; Marc Kirschner; Danny Saks and John Robison; Brian Wegner and Mark Kirschner	1.50	1,162.50
02/03/20 ASH	Analysis of Deposition transcript Analyze excerpts from transcripts of depositions of Wilmington Trust; Dhruv Narain; Marc Kirschner; Danny Saks and John Robison and Brian Wegner	2.20	1,705.00
02/03/20 ASH	Analysis of Legal Papers Proof of claim filed by SHIP	1.40	1,085.00
02/03/20 ASH	Analysis of Legal Papers Analyze UCC filings; email to EBW; Brent Weisenberg and ACS regarding same	.40	310.00
02/03/20 EBW	Reviewed Transcript of Exam. Beechwood - review of deposition transcripts.	2.20	1,771.00
02/03/20 EBW	Correspondence Beechwood - correspondence with SHIP.	1.10	885.50

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02/03/20 GSL	Analysis of Deposition transcript Re motions for summary judgment	2.30	828.00
02/03/20 GSL	Preparation of Memorandum Prepared draft memorandum of law - re motion for summary judgment	3.70	1,332.00
02/03/20 JKH	Review/analyze Beechwood - document research re: receipt of statements by SHIP	.60	183.00
02/03/20 JKH	Research Beechwood - transcript and document searches for certain key items and documents related to motion for summary judgment	1.30	396.50
02/03/20 JKH	Review/analyze Beechwood - review and summarize markups of Feuer (day 1) transcript	3.40	1,037.00
02/04/20 ASH	Analysis of Brief for motion Analyze draft of memorandum of law in support of possible motion for summary judgment	.90	697.50
02/04/20 ASH	Preparation of Legal Papers Prepare Rule 56.1 Statement in in support of possible motion for summary judgment	4.80	3,720.00

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02/04/20	ASH	Analysis of Deposition transcript Analyze deposition transcripts including Lorentz and Wilmington Trust	.90	697.50
02/04/20	EBW	Preparation for Conference Beechwood - preparation for meeting with SHIP.	1.40	1,127.00
02/04/20	EBW	Legal Research Beechwood - attention to summary judgment legal research.	3.10	2,495.50
02/04/20	EBW	Reviewed Transcript of Exam. Beechwood - review of deposition transcripts and exhibits.	2.10	1,690.50
02/04/20	GSL	Research re Memorandum Research - re 56.1 statement requirements	.20	72.00
02/04/20	JKH	Review/analyze Beechwood - review and summarize marked transcript of Feuer (day 1)	.70	213.50
02/04/20	JKH	Review/analyze Beechwood - review and summarize marked up transcript of Serio	4.30	1,311.50
02/04/20	JKH	Review/analyze Beechwood - review and summarize Feuer (day 2) marked transcript	1.60	488.00

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02/04/20 WMM	Legal services/Client Continue analysis of Wegner; Staldine and Lorenz summaries and revising same.	4.50	4,027.50
02/05/20 ASH	Conference(s) w/ CoCounsel - Other Meeting with EBW; Brent Weisenberg; WMM and GSL regarding motions for summary judgment (ASH Portion)	1.40	1,085.00
02/05/20 ASH	Research re Legal Papers Legal research regarding motions for summary judgment; email to Brent Weisenberg; EBW and WMM regarding same	1.20	930.00
02/05/20 ASH	Research re Notice of petition Review cases; emails to Brent Weisenberg; EBW and GSL regarding same	1.10	852.50
02/05/20 ASH	Analysis of Legal Papers Analyze documents regarding transactions underlying claims in First Amended Complaint	1.10	852.50
02/05/20 ASH	Review/correct Correspondence Revise letter to SHIP; emails to internal team regarding same	.50	387.50
02/05/20 ASH	Preparation of Legal Papers Prepare Rule 56.1 statement in support of motion for summary judgment	2.10	1,627.50

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02/05/20 EBW	Conference(s) In Office Beechwood - strategy session with litigation team.	1.80	1,449.00
02/05/20 EBW	Legal Research Beechwood - attention to summary judgment legal research.	2.30	1,851.50
02/05/20 EBW	Telephone Call(s) Beechwood - teleconference with Court regarding summary judgment page limits and attention to Court' ruling.	.40	322.00
02/05/20 EBW	Preparation for Conference Beechwood - preparation for meeting with SHIP receiver.	1.20	966.00
02/05/20 EBW	Reviewed Transcript of Exam. Beechwood - review of deposition transcripts and exhibits.	.80	644.00
02/05/20 ACS	Review/correct Correspondence Review and mark up draft letter to SHIP receiver	.50	455.00
02/05/20 GSL	Conference(s) re Brief for motion Platinum-Beechwood team meeting - re summary judgment motion	1.70	612.00

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02/05/20 GSL	Research re Memorandum Follow up research - re summary judgment motion	4.80	1,728.00
02/05/20 GSL	Review/correct Memorandum Re summary judgment motion	2.10	756.00
02/05/20 JKH	Review/analyze Beechwood - review and summarize Huberfeld (day 1) transcript notes	2.10	640.50
02/05/20 JKH	Research Beechwood - research re: Kimelman referenced in Huberfeld transcript	1.40	427.00
02/05/20 JKH	Review/analyze Beechwood - review CNO deposition transcripts	.30	91.50
02/05/20 JKH	Correspondence Beechwood - prepare email summary re: Michael Kimelman	.40	122.00
02/05/20 JKH	Review/analyze Beechwood - review transcript markup of Huberfeld (day 2) and prepare summary	1.60	488.00
02/05/20 WMM	Legal services/Client Team meeting concerning SJ.	1.00	895.00

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02/05/20 WMM	Legal services/Client summaries of SHIP depositions.	3.60	3,222.00
02/05/20 WMM	Legal services/Legal Papers Analyzing research and draft MOL for SJ motion; communications concerning same.	2.20	1,969.00
02/05/20 WMM	Legal services/Client Communicatons concerning Kimmelman evidence	.30	268.50
02/06/20 ASH	Review/correct Settlement Agreement Settlement agreement; emails with Brent Weisenberg and EBW regarding same	.50	387.50
02/06/20 ASH	Review/correct Brief for motion Memorandum of Law in Support of Motion for Partial Summary Judgment	.60	465.00
02/06/20 ASH	Preparation of Legal Papers Rule 56.1 statement in support of possible motion for partial summary judgment	2.90	2,247.50
02/06/20 ASH	Analysis of Resp to disc. device Analyze revised responses to Requests for Admissions served by Beechwood; email to EBW; GSL and Brent Weisenberg regarding same	.30	232.50

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02/06/20	EBW	Legal Research Beechwood - review of legal research regarding summary judgment.	3.10	2,495.50
02/06/20	EBW	Preparation for Conference Beechwood - preparation for conference with SHIP.	1.60	1,288.00
02/06/20	EBW	Analysis of Legal Papers Beechwood - review of settlement agreement.	.60	483.00
02/06/20	GSL	Analysis/Strategy Research - re Beechwood Response to RFAs	2.50	900.00
02/06/20	GSL	Review/correct Memorandum Re motion for summary judgment	.40	144.00
02/06/20	JKH	Review/analyze Beechwood - review of Beechwood's amended RFAs	.30	91.50
02/06/20	JKH	Review/analyze Beechwood - review Wilmington Trust statements	.70	213.50
02/06/20	JKH	Document Review Beechwood - document review and searches re: Kimelman	1.30	396.50

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02/06/20 JKH	Review/analyze Beechwood - review and profile Robison (day 3) transcript and exhibits	.30	91.50
02/06/20 JKH	Preparation of Digest of dep. trans. Beechwood - re: Albanese transcript	2.60	793.00
02/06/20 JKH	Review/analyze Beechwood - continued analysis and summary of Serio transcript	1.70	518.50
02/06/20 WMM	Legal services/Client Attention to issue of admissibility of trust statements and authentication of same; and business record exception issues.	.80	716.00
02/06/20 WMM	Legal services/Legal Papers Communications concerning Day 2 of Robison deposition and analyzing same for SJ summaries.	6.50	5,817.50
02/06/20 WMM	Legal services/Client Communications with W. Gluck re: items of common interest	.40	358.00
02/07/20 ASH	Analysis of Deposition transcript Analyze deposition transcripts relating to motions for summary judgment	1.10	852.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/07/20 ASH	Analysis of Legal Papers Analyze documents relating to motions for summary judgment	2.20	1,705.00
02/07/20 ASH	Preparation of Legal Papers Rule 56.1 statement in support of possible motion for partial summary judgment	1.70	1,317.50
02/07/20 EBW	Correspondence Beechwood - correspondence and teleconferences with Receiver regarding SHIP meeting.	.90	724.50
02/07/20 EBW	Analysis of Legal Papers Beechwood - attention to summary judgment issues; including preparation of motion.	4.10	3,300.50
02/07/20 ACS	Telephone Call(s) w/Client Telecon Receiver and EBW re SHIP strategy	.30	273.00
02/07/20 GSL	Review/correct Memorandum Re summary judgment motion	.40	144.00
02/07/20 JKH	Review/analyze Beechwood - review Wilmington Trust production re: statements	2.30	701.50
02/07/20 JKH	Review/analyze Beechwood - continued analysis and summary of Albanese deposition	2.60	793.00

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02/07/20 JKH	Review/analyze Beechwood - review of Bowler transcript	1.40	427.00
02/07/20 WMM	Legal services/Client Communications concerning potential settlement and consideration of proposed terms.	.50	447.50
02/07/20 WMM	Legal services/Legal Papers Analyzing Day 3 of Robison deposition and drafting summaries of same for SJ; revising all summaries.	7.10	6,354.50
02/08/20 ASH	Preparation of Brief for motion Prepare memorandum of law in support of possible motion for summary judgment	3.60	2,790.00
02/08/20 ASH	Analysis of Legal Papers Analysis of liens	2.10	1,627.50
02/08/20 EBW	Telephone Call(s) Beechwood - teleconferences with litigation team regarding status and strategy. (EBW portion)	1.40	1,127.00
02/08/20 GSL	Telephone Call(s) re: Brief for motion Platinum-Beechwood team call - re motion for summary judgment	1.00	360.00
02/08/20 GSL	Preparation of Memorandum Re summary judgment motion	6.00	2,160.00

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02/08/20	WMM	Legal services/Client Communications concerning strategy.	.40	358.00
02/09/20	ASH	Preparation of Brief for motion Memorandum of law in support of motion for partial summary judgment	1.80	1,395.00
02/09/20	ASH	Research re Brief for motion Regarding summary judgment motions	2.10	1,627.50
02/09/20	EBW	Preparation of Legal Papers Beechwood - review of and revisions to; summary judgment pleadings.	1.90	1,529.50
02/09/20	JKH	Preparation of Digest of dep. trans. Beechwood - re: Bowler transcript	1.30	396.50
02/09/20	WMM	Preparation of Opposing brief for motion Reviewing draft MOL for SJ	2.10	1,879.50
02/10/20	ASH	Conference(s) w/ Client Meetings with Receiver; EBW; WMM and Brent Weisenberg regarding summary judgment motions	1.30	1,007.50
02/10/20	ASH	Preparation of Legal Papers Outline re issues for motions for summary judgment	4.20	3,255.00

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02/10/20 ASH	Preparation of Brief for motion Memorandum of Law in Support of Motion for Partial Summary Judgment on Agency and Imputation	2.90	2,247.50
02/10/20 ASH	Research re Brief for motion Legal research regarding summary judgment motion	.90	697.50
02/10/20 ASH	Preparation of Deposition transcript Transcript of deposition of Tim Hart	.60	465.00
02/10/20 ASH	Analysis of Legal Papers Analysis of loan agreements	.80	620.00
02/10/20 EBW	Conference(s) In Office Beechwood - conferences with Receiver regarding SHIP. (EBW portion).	.80	644.00
02/10/20 EBW	Telephone Call(s) Beechwood - teleconference with Receiver and SEC regarding common interest issues. (EBW portion).	1.00	805.00
02/10/20 EBW	Conference(s) In Office Beechwood - conference with litigation team regarding summary judgment.	.70	563.50
02/10/20 EBW	Preparation of Legal Papers Beechwood - preparation of summary judgment papers.	6.00	4,830.00

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02/10/20	ACS	Conference(s) w/ Client Meet with Receiver re SHIP Beechwood strategy	.60	546.00
02/10/20	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and EBW re SHIP Beechwood strategy	.20	182.00
02/10/20	ACS	Conference(s) w/ CoCounsel - Other Meet with EBW (.2) and then meet with Receiver (.2) re call with SEC	.40	364.00
02/10/20	GSL	Review file re Deposition Additional review of transcripts - re motions for summary judgment	1.00	360.00
02/10/20	GSL	Preparation of Memorandum Motion for summary judgment - agency	2.30	828.00
02/10/20	JKH	Preparation of Digest of dep. trans. Beechwood - Bowler transcript	4.30	1,311.50
02/10/20	JKH	Preparation of Digest of dep. trans. Beechwood - re: Albanese	.70	213.50
02/10/20	WMM	Preparation of Legal Papers Review draft statement of undisputed facts and communications about same.	2.50	2,237.50

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02/10/20 WMM	Legal services/Client Continue revisions to Lorentz summaries of testimony for brief and analysis of transcripts.	2.50	2,237.50
02/10/20 WMM	Legal services/Client Communications concerning draft.	.50	447.50
02/10/20 WMM	Legal services/Client Team meeting and call to SEC re: common interest issues	1.50	1,342.50
02/10/20 WMM	Preparation of Opposing brief for motion Communications concerning outline for MSJ and review same.	.50	447.50
02/11/20 ASH	Conference(s) w/ CoCounsel - Other Team meeting regarding outline of facts	2.30	1,782.50
02/11/20 ASH	Memorandum to CoCounsel - Other To EBW; Brent Weisenberg; WMM and GSL regarding issues relating to SHIP's motion for summary judgment	1.60	1,240.00
02/11/20 ASH	Analysis of Brief for motion revisions to memorandum of law in support of motion for partial summary judgment	.90	697.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/11/20 ASH	Research re Brief for motion Legal research relating to memorandum of law in support of motion for summary judgment	.70	542.50
02/11/20 ASH	Analysis of Deposition transcript Analyze deposition testimony for motion for partial summary judgment	1.40	1,085.00
02/11/20 ASH	Preparation of Brief for motion Memorandum of Law in support of motion for partial summary judgment	.70	542.50
02/11/20 EBW	Telephone Call(s) Beechwood - teleconference with SEC regarding common interest issues. (EBW portion).	.40	322.00
02/11/20 EBW	Conference(s) In Office Beechwood - conference with litigation team regarding summary judgment.	1.80	1,449.00
02/11/20 EBW	Preparation of Legal Papers Beechwood - preparation of summary judgment papers.	5.50	4,427.50
02/11/20 GSL	Conference(s) re Brief for motion Platinum-Beechwood Team meeting - re motions for summary judgment	1.80	648.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/11/20 GSL	Review/correct Memorandum Changes to memorandum of law in support of motion for summary judgment	5.80	2,088.00
02/11/20 GSL	Preparation of Legal Papers Preparation of notice of motion and EBW declaration - re motion for summary judgment	2.30	828.00
02/11/20 JKH	Review/analyze Beechwood - review Wilmington Trust statements	2.30	701.50
02/11/20 JKH	Review Documents Beechwood - additional document searches re: Kimelman; preparing email summary re same	1.60	488.00
02/11/20 JKH	Preparation of Digest of dep. trans. Beechwood - Review transcript markups and prepare summary of Tim Hart Deposition	.70	213.50
02/11/20 WMM	Legal services/Client Team meeting with Receiver concerning status of motions and strategy.	.90	805.50
02/11/20 WMM	Legal services/Client Prepare for and participate in conference with EBW and Neal Jacobson of SEC.	.40	358.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/11/20 WMM	Preparation of Legal Papers Analysis of depositions to outline for MSJ; and continue review of depositions for same.	3.50	3,132.50
02/11/20 WMM	Legal services/Client Review and revise outline of argumetns for summary judgment and communicatons concerning same.	1.50	1,342.50
02/11/20 WMM	Preparation of Legal Papers Reviewing draft brief for motion for SJ on agency.	2.40	2,148.00
02/12/20 ASH	Analysis of Legal Papers Analyze loan transactions; prepare analysis of same	1.50	1,162.50
02/12/20 ASH	Examine Documents Analyze documents produced by SHIP; telephone calls and emails with Brian Seibert regarding same	.40	310.00
02/12/20 ASH	Preparation of Brief for motion Revise memorandum of law in support of motion for partial summary judgment	4.50	3,487.50
02/12/20 ASH	Analysis of Brief for motion Comments from Adam Silverstein on memorandum of law of law in support of motion for partial summary judgment	.40	310.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/12/20	EBW	Preparation of Legal Papers Beechwood - preparation of summary judgment papers.	6.50	5,232.50
02/12/20	EBW	Telephone Call(s) Beechwood - teleconference with adversaries and Court.	.40	322.00
02/12/20	ACS	Conference(s) w/ Client Meet with Receiver re SHIP strategy	.20	182.00
02/12/20	GSL	Preparation of Legal Papers Continued preparing EBW declaration - re motion for summary judgment	2.00	720.00
02/12/20	GSL	Review/correct Memorandum Changes to memorandum of law - re motion for summary judgment	3.90	1,404.00
02/12/20	GSL	Preparation of Legal Papers Preparation of exhibits - EBW declaration - re motion for summary judgment	2.70	972.00
02/12/20	JKH	Review/analyze Beechwood - review of drafts re motion for summary judgment	2.40	732.00
02/12/20	JKH	Document Review Beechwood - document searches related to MSJ papers	1.40	427.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/12/20 WMM	Legal services/Client Communications concerning case issues.	.40	358.00
02/12/20 WMM	Legal services/Legal Papers Analyze draft brief on MSJ on communications concerning same.	2.20	1,969.00
02/12/20 WMM	Legal services/Client Continue analyzing Saks; Narain and Thomas depositions to marshall evidence in opposition to SJ brief.	4.50	4,027.50
02/12/20 WMM	Legal services/Client Reviewing draft 56.1 statement and communications concerning same.	2.50	2,237.50
02/13/20 ASH	Preparation of Brief for motion Memorandum of law in support of motion for partial summary judgment	7.70	5,967.50
02/13/20 ASH	Research re Brief for motion Legal research regarding motion for partial summary judgment	1.30	1,007.50
02/13/20 ASH	Review/correct Legal Papers Statement of undisputed facts in support of Motion for summary judgment	2.70	2,092.50
02/13/20 ASH	Preparation of Notice of motion Notice of motion in support of motion for partial summary judgment	.30	232.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/13/20 ASH	Preparation of Affidavit for motion Prepare declaration of Erik B. Weinick in support of motion for partial summary judgment	.40	310.00
02/13/20 EBW	Preparation of Legal Papers Beechwood - preparation of summary judgment motion.	7.00	5,635.00
02/13/20 EBW	Conference(s) In Office Beechwood - conference with Receiver and litigation team regarding status and strategy.	1.80	1,449.00
02/13/20 ACS	Conference(s) w/ CoCounsel - Other Meet with EBW; WM; RGH and Receiver re Beechwood strategy	1.80	1,638.00
02/13/20 ACS	Telephone Call(s) w/CoCounsel - Other Meet with Receiver and telecon N Jacobson and A Bambach	.60	546.00
02/13/20 GSL	Review/correct Memorandum Changes to memorandum of law - re motion for summary judgment against SHIP	13.00	4,680.00
02/13/20 JKH	Review/analyze Beechwood - Review SOF and prepare transcript excerpts for exhibits to decl in support of summary judgment	2.90	884.50

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02/13/20	JKH	Review/analyze Beechwood - continued preparation of summary of all deposition analysis	2.60	793.00
02/13/20	JKH	Review/analyze Beechwood - review statement of facts	1.40	427.00
02/13/20	JKH	Review/analyze Beechwood - review MOL in support of summary judgment	1.30	396.50
02/13/20	JKH	Review/analyze Beechwood - review exhibits for accuracy with SOF	1.30	396.50
02/13/20	WMM	Legal services/Client Prepare for and participate in conference with MLC; RGH; ACS and EBW concerning status and strategy	1.50	1,342.50
02/13/20	WMM	Legal services/Legal Papers Communications concerning revisions to motion for SJ on agency and analyze same.	2.20	1,969.00
02/13/20	WMM	Legal services/Client Analyzing draft settlement and communications concerning same.	.80	716.00
02/13/20	WMM	Legal services/Client Continue analysis of depositions for marshalling of evidence and add to outline.	4.50	4,027.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/14/20 ASH	Review/correct Brief for motion Prepare and finalize memorandum of law in support of motion for summary judgment	4.40	3,410.00
02/14/20 ASH	Preparation of Legal Papers Rule 56.1 Statement in support of motion for partial summary judgment on issues of agency and imputation	1.30	1,007.50
02/14/20 ASH	Analysis of Brief for motion Memorandum of Law in Support of PBIHL's motion for summary judgment	.40	310.00
02/14/20 ASH	Examine Documents Analyze documents relating to motion for partial summary judgment on issues of agency and imputation	.50	387.50
02/14/20 EBW	Preparation of Legal Papers Beechwood - preparation of summary judgment motion.	9.50	7,647.50
02/14/20 ACS	Analysis of Settlement Agreement Review draft settlement agreement for comments (.4) and e-mail to B Weisenberg and EBW re same (.1)	.50	455.00
02/14/20 GSL	Review/correct Legal Papers Final changes to summary judgment papers for filing	11.60	4,176.00

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02/14/20	JKH	Prepare Legal Papers Beechwood - prepare exhibits to decl. in support of summary judgment	1.20	366.00
02/14/20	JKH	Review/analyze Beechwood - review and edit MOL in support of summary judgment	2.60	793.00
02/14/20	JKH	Review/analyze Beechwood - review 56.1 statement	1.60	488.00
02/14/20	JKH	Filing Papers in Court Beechwood - preparing and filing summary judgment papers	1.70	518.50
02/14/20	JKH	Preparation of Digest of dep. trans. Beechwood - reviewing all deposition summaries and preparing overall summary of depositions	2.20	671.00
02/14/20	JKH	Prepare Legal Papers Beechwood - Preparing and sending email with summary judgment papers; including exhibits to SEC	.40	122.00
02/14/20	JKH	Review/analyze Beechwood - review PBIHL motion for summary judgment	.40	122.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/14/20 WMM	Legal services/Client Finalize analysis of depositions for outline and revising same.	6.50	5,817.50
02/14/20 WMM	Legal services/Client Communications concerning CNO settlement draft.	.50	447.50
02/14/20 WMM	Legal services/Client Finalize motions for SJ on agency and communications concerning same.	1.50	1,342.50
02/15/20 JKH	Review/analyze Beechwood - review SHIP summary judgment brief	1.60	488.00
02/16/20 ASH	Analysis of Brief for motion Analyze briefs filed in support of motions for summary judgment	2.10	1,627.50
02/16/20 ASH	Preparation of Brief for motion Prepare memorandum of law in opposition to motions for summary judgment	2.10	1,627.50
02/16/20 ASH	Correspondence w/CoCounsel - Other To Trey Rogers regarding information needed for opposition to motion for summary judgment	.60	465.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/16/20 ASH	Analysis of Legal Papers Analyze exhibits in SHIP's support of motion for summary judgment	2.10	1,627.50
02/16/20 EBW	Analysis of Legal Papers Beechwood - analysis of summary judgment papers and correspondence with team regarding same.	2.20	1,771.00
02/17/20 ASH	Preparation of Opposing brief for motion Memorandum of Law in Opposition to Motions for Summary Judgment	1.40	1,085.00
02/17/20 ASH	Analysis of Brief for motion SHIP's memorandum of law in support of motion for summary judgment	1.30	1,007.50
02/17/20 ASH	Preparation of Legal Papers Prepare list of issues and questions relating to motions for summary judgment	2.20	1,705.00
02/17/20 EBW	Correspondence Beechwood - correspondence and teleconference with counsel for PPVA regarding items of common interest.	.40	322.00
02/17/20 EBW	Analysis of Legal Papers Beechwood - analysis of summary judgment papers and correspondence with team regarding same.	1.50	1,207.50

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02/17/20	GSL	Analysis of Adversary's Brief Analysis of motions for summary judgment filed against the Receiver	2.50	900.00
02/17/20	JKH	Review/analyze Beechwood - review PBIHL 30(b)(6) transcript	1.60	488.00
02/17/20	JKH	Review/analyze Beechwood - review PBIHL summary judgment brief	2.10	640.50
02/17/20	JKH	Review/analyze Beechwood - review SHIP summary judgment brief	1.30	396.50
02/18/20	ASH	Conference(s) w/ CoCounsel - Other Meeting with EBW; GSL; David Prager and Mary Jane Constant regarding response to SHIP's motion for summary judgment	1.90	1,472.50
02/18/20	ASH	Telephone Call(s) w/CoCounsel - Other With Trey Rogers; EBW; GSL; WMM and Brent Weisenberg regarding motions for summary judgment	1.10	852.50
02/18/20	ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motion for summary judgment	2.20	1,705.00

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02/18/20 ASH	Analysis of Legal Papers Analyze documents relating to motions for summary judgment	1.20	930.00
02/18/20 ASH	Research re Opposing brief for motion Legal research regarding motions for summary judgment	1.20	930.00
02/18/20 EBW	Conference(s) In Office Beechwood - conferences with litigation team and expert regarding opposition to summary judgment.	3.50	2,817.50
02/18/20 EBW	Telephone Call(s) Beechwood - teleconference with counsel for PPVA and Nordlicht regarding discovery.	.40	322.00
02/18/20 EBW	Preparation of Legal Papers Beechwood - preparation of opposition to summary judgment.	4.50	3,622.50
02/18/20 ACS	Preparation of Brief for motion Review SHIP for summary judgment motion	.50	455.00
02/18/20 GSL	Preparation of Memorandum Prepared summary of motions for summary judgment filed against the Receiver	2.80	1,008.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/18/20 GSL	Conference(s) in Office Platinum-Beechwood Team Meeting - re motions for summary judgment against the Receiver	1.50	540.00
02/18/20 GSL	Research re Memorandum Preparing list of research questions - re motions for summary judgment against the Receiver	.80	288.00
02/18/20 GSL	Conference(s) in Office Meeting with experts - re motions for summary judgment against the Receiver	2.10	756.00
02/18/20 JKH	Prepare Legal Papers Beechwood - prepare chambers copy and cover letter of partial motion for summary judgment	.80	244.00
02/18/20 JKH	Review/analyze Beechwood - review exhibits to SHIP declaration and prepare document binder re same	4.10	1,250.50
02/18/20 JKH	Document Review Beechwood - review SHIP MSJ	1.70	518.50
02/18/20 JKH	Prepare Legal Papers Beechwood - review PHIHL MSJ and prepare document binder with exhibits	1.60	488.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/18/20 JKH	Prepare Legal Papers Beechwood - prepare draft response to SHIP's SOF	.40	122.00
02/18/20 WMM	Legal services/Client Communications concerning Nordlicht's affidavit and motion for order to take deposition.	.50	447.50
02/18/20 WMM	Legal services/Legal Papers Analyzing motions for SJ from SHIP; Beechwood and PBIH.	4.50	4,027.50
02/18/20 WMM	Legal services/Client Team meeting concerning SHIP; Beechwood and PBIH motions (WMM Portion)	1.80	1,611.00
02/19/20 JSF	Examine Documents Discussion with Receiver and Updates on Status and Motion Papers	.40	340.00
02/19/20 ASH	Memorandum to Client Memo and Chart of claims; defenses and probability of success	4.30	3,332.50
02/19/20 ASH	Conference(s) w/ CoCounsel - Other Meet with Receiver regarding strategy	.20	155.00
02/19/20 ASH	Preparation of Brief for motion Prepare memorandum of law in opposition to motion for summary judgment	3.40	2,635.00

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02/19/20	ASH	Analysis of Legal Papers Analyze possible exhibits to opposition to SHIP's motion for summary judgment	1.60	1,240.00
02/19/20	ASH	Research re Legal Papers Legal research regarding summary judgment motions	1.50	1,162.50
02/19/20	EBW	Preparation for Conference Beechwood - preparation for teleconference with Court regarding Nordlicht.	.30	241.50
02/19/20	EBW	Conference(s) re Court (conference) Beechwood - participation in teleconference with Court regarding Nordlicht.	.80	644.00
02/19/20	EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motion for summary judgment.	7.00	5,635.00
02/19/20	ACS	Conference(s) w/ Client Meet with Receiver re SHIP strategy	.30	273.00
02/19/20	GSL	Review File re: Research Review of past research memos for Platinum-Beechwood litigation	.80	288.00
02/19/20	JKH	Preparation for Deposition Beechwood - review deposition exhibits in preparation for Nordlicht deposition	2.30	701.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/19/20 JKH	Prepare Legal Papers Beechwood - continued preparation of document binder of PBIHL Declaration and exhibits	1.40	427.00
02/19/20 JKH	Review/analyze Beechwood - review of email communications and attachments re: Nordlicht deposition	.60	183.00
02/19/20 JKH	Document Review Beechwood - document review related to SHIP MSJ	1.30	396.50
02/19/20 WMM	Legal services/Client Communications concerning Nordlicht deposition and meeting tomorrow with MLC.	.50	447.50
02/20/20 ASH	Conference(s) w/ CoCounsel - Other EBW; MLC and Brent Weisenberg (ASH Portion)	1.40	1,085.00
02/20/20 ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motions for summary judgment filed by SHIP and the Beechwood Entities	7.20	5,580.00
02/20/20 ASH	Research re Opposing brief for motion Legal research regarding memorandum of law in opposition to motion for summary judgment	1.30	1,007.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/20/20 ASH	Preparation of Legal Papers Summary of claims; defenses	1.10	852.50
02/20/20 EBW	Preparation for Conference Beechwood - preparation for strategy session.	1.50	1,207.50
02/20/20 EBW	Conference(s) In Office Beechwood - strategy session with Receiver and litigation team.	1.80	1,449.00
02/20/20 EBW	Telephone Call(s) Beechwood - teleconferences with SEC regarding items of common interest.	.30	241.50
02/20/20 EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions for summary judgment.	4.40	3,542.00
02/20/20 EBW	Preparation for Deposition Beechwood - preparation for Nordlicht deposition.	2.50	2,012.50
02/20/20 ACS	Telephone Call(s) w/CoCounsel - Other Receiver; RGH; EBW; WSM meeting (ACS participating by telephone) re SHIP strategy	1.60	1,456.00
02/20/20 GSL	Research re Memorandum Research - re (SHIP motion for summary judgment)	1.70	612.00

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02/20/20 GSL	Research re Memorandum Continued research - re (SHIP motion for summary judgment)	2.80	1,008.00
02/20/20 GSL	Preparation of Memorandum Preparing memorandum - re opposition to summary judgment (standing)	3.80	1,368.00
02/20/20 JKH	Preparation for Deposition Beechwood - prepare for Nordlicht deposition	2.70	823.50
02/20/20 JKH	Document Review Beechwood - document review related to SHIP MSJ	1.40	427.00
02/20/20 WMM	Legal services/Client Prepare for and participate in conference with MLC; RGH; ACS and EBW concerning opposition to MSJ; communications concerning same.	1.80	1,611.00
02/20/20 WMM	Legal services/Client Review outline for discussion with SEC.	1.20	1,074.00
02/20/20 WMM	Legal services/Client Numerous conference and communications concerning status and strategy.	1.20	1,074.00

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02/21/20 ASH	Analysis of Legal Papers Analyze documents relating to responses to Motions for Summary Judgment filed by SHIP and the Beechwood Defendants	2.30	1,782.50
02/21/20 ASH	Preparation of Legal Papers Legal research regarding Memorandum of Law in Opposition to Motions for Summary Judgment filed by SHIP and the Beechwood Entities	3.20	2,480.00
02/21/20 ASH	Preparation of Opposing brief for motion Prepare Memorandum of Law in Opposition to Motion for Summary Judgment filed by SHIP and the Beechwood Defendants	4.40	3,410.00
02/21/20 EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions for summary judgment.	8.50	6,842.50
02/21/20 EBW	Preparation for Deposition Beechwood - preparation for Nordlicht deposition; including correspondence with various counsel regarding same.	.60	483.00
02/21/20 GSL	Preparation of Memorandum Continued preparing memorandum - re opposition (standing)	.70	252.00
02/21/20 GSL	Research re Memorandum Research - re (SHIP summary judgment motion)	3.30	1,188.00

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02/21/20 GSL	Research re Memorandum Research - (SHIP summary judgment motion)	3.50	1,260.00
02/21/20 JKH	Prepare Legal Papers Beechwood - preparing electronic copy of all exhibits	2.40	732.00
02/21/20 JKH	Document Review Beechwood - document review in connection with response to SJ motions	.60	183.00
02/21/20 WMM	Legal services/Client Communications concerning status and strategy concerning motions and Nordlicht deposition.	.50	447.50
02/22/20 ASH	Preparation of Opposing brief for motion Memorandum of Law in Opposition to Motions for Summary Judgment	5.50	4,262.50
02/22/20 ASH	Research re Opposing brief for motion Legal research regarding memorandum of law in opposition to motion for summary judgment	2.30	1,782.50
02/22/20 EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions for summary judgment.	7.00	5,635.00

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02/22/20		Research re Memorandum	4.00	1,440.00
	GSL	Research - re (SHIP motion for summary judgment)		
02/22/20		Preparation of Memorandum	4.00	1,440.00
	GSL	Preparation of opposition - re (SHIP motion for summary judgment)		
02/22/20		Legal services/Legal Papers	3.50	3,132.50
	WMM	Drafting of opposition to summary judgment		
02/23/20		Preparation of Opposing brief for motion	7.10	5,502.50
	ASH	Prepare memorandum of law in opposition to motions for summary judgment		
02/23/20		Research re Legal Papers	2.80	2,170.00
	ASH	Legal research regarding summary judgment		
02/23/20		Preparation of Legal Papers	5.90	4,749.50
	EBW	Beechwood - preparation of opposition to motions for summary judgment.		
02/23/20		Research re Memorandum	8.00	2,880.00
	GSL	Continued research - re (SHIP motion for summary judgment)		
02/23/20		Legal services/Client	3.20	2,864.00
	WMM	Beechwood - Review cases re: Summary Judgment		

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/23/20 WMM	Legal services/Legal Papers Review revised brief	.80	716.00
02/24/20 ASH	Conference(s) w/ CoCounsel - Other With WMM; EBW regarding issues relating to summary judgment motions	.30	232.50
02/24/20 ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motions for summary judgment	5.90	4,572.50
02/24/20 ASH	Research re Opposing brief for motion Review caselaw regarding opposition to motions for summary judgment	1.70	1,317.50
02/24/20 ASH	Examine Documents Analyze documents relating to motions for summary judgment	1.30	1,007.50
02/24/20 EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions for summary judgment.	9.20	7,406.00
02/24/20 EBW	Telephone Call(s) Beechwood - teleconference with Receiver and SEC regarding common interest items.	.80	644.00
02/24/20 ACS	Correspondence w/Client Prepare for conference call with SEC re SHIP motion	.30	273.00

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02/24/20	ACS	Telephone Call(s) w/CoCounsel - Other Call with Receiver and SEC re SHIP (.7) and follow up call with Receiver (.3)	1.00	910.00
02/24/20	GSL	Research re Memorandum Research -- legal issues on summary judgment	1.50	540.00
02/24/20	GSL	Research re Memorandum Continued research - re legal issues on summary judgment motions	2.60	936.00
02/24/20	GSL	Conference(s) re Brief for motion Platinum-Beechwood team meeting - re motions for summary judgment	.60	216.00
02/24/20	GSL	Preparation of Memorandum Opposition to motions for summary judgment	3.60	1,296.00
02/24/20	JKH	Review/analyze Beechwood - review transcripts re: relationships of beneficiaries	.60	183.00
02/24/20	JKH	Document Review Beechwood - document review in connection with response to sj motions	1.40	427.00
02/24/20	JKH	Preparation for Deposition Beechwood - prepare for Nordlicht deposition	.60	183.00

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02/24/20 WMM	Legal services/Client Review draft of brief	6.00	5,370.00
02/24/20 WMM	Legal services/Client Communications with counsel concerning briefing.	.40	358.00
02/24/20 WMM	Legal services/Legal Papers Review new summary judgment papers and research	.60	537.00
02/24/20 WMM	Legal services/Client Communications concerning Nordlicht's deposition and time for each party.	.50	447.50
02/24/20 WMM	Legal services/Client Team conference concerning breakdown of briefing.	.10	89.50
02/25/20 ASH	Research re Opposing brief for motion Legal research regarding issues relating to opposition to motions for summary judgment	1.30	1,007.50
02/25/20 ASH	Preparation of Opposing brief for motion Prepare memorandum of law in support of motions for summary judgment filed by SHIP; the Beechwood Defendants and PBIHL	4.30	3,332.50

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/25/20	ASH	Examine Documents Analyze documents relating memorandum of law in opposition to motions for summary judgment	1.10	852.50
02/25/20	ASH	Analysis of Deposition transcript Kalter depo transcript	.60	465.00
02/25/20	EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions for summary judgment.	6.80	5,474.00
02/25/20	EBW	Preparation for Deposition Beechwood - preparation for Nordlicht deposition.	2.20	1,771.00
02/25/20	ACS	Preparation of Brief for motion Review of SHIP summary judgment brief to edit response	.40	364.00
02/25/20	GSL	Review/correct Memorandum Summary judgment standard - re motions for summary judgment	1.10	396.00
02/25/20	GSL	Preparation of Memorandum Continued opposition to motions for summary judgment	1.40	504.00
02/25/20	JKH	Review/analyze Beechwood - review kalter transcript and exhibits	.70	213.50

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02/25/20 JKH	Review/analyze Beechwood - review transcripts re: beneficiary relationships	1.20	366.00
02/25/20 WMM	Legal services/Client Review draft outline for Nordlicht's deposition.	.80	716.00
02/25/20 WMM	Legal services/Legal Papers Continue drafting good faith section for brief.	3.50	3,132.50
02/26/20 ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motions for summary judgment filed by SHIP; the Beechwood Defendants and PBIHL	4.30	3,332.50
02/26/20 ASH	Examine Documents Analyze documents regarding summary judgment	1.60	1,240.00
02/26/20 ASH	Research re Opposing brief for motion Legal research regarding motions for summary judgment filed by SHIP; the Beechwood Defendants and PBIHL	1.90	1,472.50
02/26/20 ASH	Correspondence w/CoCounsel - Other to David Prager and Mary Jane Constrant regarding issues regarding summary judgment motion	.30	232.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/26/20 ASH	Conference(s) w/ CoCounsel - Other Meetings with ACS regarding response to Motion for Summary Judgment filed by SHIP	1.30	1,007.50
02/26/20 ASH	Correspondence w/CoCounsel - Other to Trey Rogers regarding issues relating to summary judgment motions	.50	387.50
02/26/20 ASH	Telephone Call(s) w/CoCounsel - Other Trey Rogers regarding factual issues	.30	232.50
02/26/20 EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions for summary judgment.	7.90	6,359.50
02/26/20 EBW	Preparation for Deposition Beechwood - preparation for Nordlicht deposition.	1.70	1,368.50
02/26/20 EBW	Telephone Call(s) Beechwood - teleconference with PPVA's counsel regarding joint interest items regarding Nordlicht deposition.	.30	241.50
02/26/20 ACS	Conference(s) w/ CoCounsel - Other Meetings with ASH re response to SHIP motion	1.30	1,183.00
02/26/20 GSL	Preparation of Memorandum Continued opposition to motions for summary judgment	1.50	540.00

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02/26/20	JKH	Document Review Beechwood - document searches re: N Management	1.40	427.00
02/26/20	JKH	Correspondence Beechwood - email communications re: deposition transcripts	.60	183.00
02/26/20	JKH	Preparation for Deposition Beechwood - review docs re: Nordlicht deposition	1.70	518.50
02/26/20	JKH	Review/analyze Beechwood - review transcripts re: response to MSJs	1.10	335.50
02/26/20	WMM	Legal services/Client Communicaitons concerning Nordlicht deposition and call with H&K concerning same.	.90	805.50
02/26/20	WMM	Legal services/Legal Papers Continue to marshall evidence for brief	6.40	5,728.00
02/26/20	WMM	Legal services/Client Review SHIP's SOF and communications concerning same.	.50	447.50
02/26/20	WMM	Legal services/Legal Papers Review current draft of brief and communications concerning same.	1.50	1,342.50

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02/27/20 ASH	Conference(s) w/ CoCounsel - Other WMM; GSL; EBW and Brent Weisenberg re SJ motions	.50	387.50
02/27/20 ASH	Examine Documents Analyze Prager report and other documents relating to motions for summary judgment; emails to internal team and Trey Rogers regarding same	1.10	852.50
02/27/20 ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motions for summary judgment filed by SHIP; the Beechwood Defendants and PBIHL	4.80	3,720.00
02/27/20 ASH	Conference(s) w/ CoCounsel - Other Meet with ACS regarding motion for summary judgment	.60	465.00
02/27/20 ASH	Telephone Call(s) w/CoCounsel - Other Telephone conference with ACS; David Prager and Trey Rogers re response to SHIP motion	1.00	775.00
02/27/20 ASH	Correspondence w/CoCounsel - Other Trey Rogers regarding fact relating to motion for summary judgment	.20	155.00
02/27/20 ASH	Preparation of Legal Papers Outline of affidavit of Trey Rogers regarding deposition outline	.50	387.50

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02/27/20 ASH	Telephone Call(s) w/CoCounsel - Other Trey Rogers regarding factual issues	.40	310.00
02/27/20 EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions for summary judgment.	10.00	8,050.00
02/27/20 EBW	Preparation for Deposition Beechwood - preparation for Nordlicht deposition.	1.50	1,207.50
02/27/20 EBW	Telephone Call(s) Beechwood - teleconference with Court and correspondence with adversaries regarding page limitations.	.20	161.00
02/27/20 EBW	Telephone Call(s) Beechwood - teleconference with SEC regarding issues of common interest.	.20	161.00
02/27/20 EBW	Telephone Call(s) Beechwood - teleconference with PPVA's counsel regarding items of common interest.	.20	161.00
02/27/20 ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon D Prager and T Rogers re response to SHIP motion	1.00	910.00

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02/27/20 ACS	Conference(s) w/ CoCounsel - Other Continued review of SHIP motion (3/10) and Meet with ASH re response to SHIP motion (6/10)	.90	819.00
02/27/20 GSL	Research re Memorandum Continued research - re legal issues on summary judgment	3.00	1,080.00
02/27/20 GSL	Conference(s) re Brief for motion Team meeting - re status of MOL in opposition to motions for summary judgment	.80	288.00
02/27/20 GSL	Preparation of Memorandum Continued opposition to motions for summary judgment	3.50	1,260.00
02/27/20 GSL	Review/correct Memorandum Opposition to Motions for SJ	5.00	1,800.00
02/27/20 JKH	Preparation for Deposition Beechwood - review Nordlicht depo outline re: exhibits	1.30	396.50
02/27/20 JKH	Preparation for Deposition Beechwood - document searches re: Nordlicht deposition	2.30	701.50
02/27/20 JKH	Preparation for Deposition Beechwood - prepare exhibits and binder for Nordlicht deposition	3.20	976.00

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02/27/20	JKH	Correspondence Beechwood - email communications with B. Weisenberg re: deposition transcripts	.40	122.00
02/27/20	WMM	Legal services/Client Participation in call with N. Jacobson of SEC and EBW	.20	179.00
02/27/20	WMM	Legal services/Client Team meeting concerning brief.	.50	447.50
02/27/20	WMM	Legal services/Client Communicaitons among counsel concerning Nordlicht deposition and analysis of same.	.50	447.50
02/27/20	WMM	Legal services/Legal Papers Review draft brief	.60	537.00
02/27/20	WMM	Legal services/Client Communiations concerning Nordlicht deposition and status.	.30	268.50
02/27/20	WMM	Legal services/Legal Papers Continue drafting brief and communications re: same	8.50	7,607.50
02/28/20	ASH	Preparation of Opposing brief for motion Prepare portions of memorandum of law in opposition to motion for summary relating to the Beechwood Defendants	3.70	2,867.50

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02/28/20 ASH	Preparation of Legal Papers Meeting with WMM; EBW; Brent Weisenberg regarding issues relating to summary judgment papers	.60	465.00
02/28/20 ASH	Analysis of Deposition transcript Deposition transcripts relating to motions for summary judgment	.90	697.50
02/28/20 EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions for summary judgment.	7.50	6,037.50
02/28/20 EBW	Preparation for Deposition Beechwood - preparation for Nordlicht deposition.	1.10	885.50
02/28/20 ACS	Review/correct Opposing brief for motion Review and comment on SHIP opposition to sj brief	1.20	1,092.00
02/28/20 GSL	Preparation of Memorandum Continued opposition to motions for summary judgment	3.60	1,296.00
02/28/20 GSL	Conference(s) re Brief for motion Team Meeting - re opposition to motions for summary judgment	.90	324.00

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02/28/20	GSL	Review/correct Memorandum Re opposition to motions for summary judgment	.50	180.00
02/28/20	GSL	Review file re Deposition Reviewed expert deposition transcripts	.90	324.00
02/28/20	GSL	Research re Memorandum Continued research - re legal issues on summary judgment	1.50	540.00
02/28/20	JKH	Preparation for Deposition Beechwood - prepare documents for Nordlicht deposition	3.60	1,098.00
02/28/20	JKH	Conference(s) in Office Beechwood - team meeting re: filing steps	.60	183.00
02/28/20	JKH	Review/analyze Beechwood - review draft MOL in response to SJ motions	.80	244.00
02/28/20	JKH	Review/analyze Beechwood - review draft statement of facts	1.30	396.50
02/28/20	WMM	Legal services/Legal Papers Analyzing draft brief and revising same; communications concerning same and SEC.	3.90	3,490.50

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02/28/20 WMM	Legal services/Legal Papers Review declaratory judgment section.	.30	268.50
02/28/20 WMM	Legal services/Legal Papers Reviewing PBIH section.	.80	716.00
02/28/20 WMM	Legal services/Legal Papers Reviewing SOF draft.	2.50	2,237.50
02/29/20 ASH	Preparation of Opposing brief for motion Memorandum of Law in Opposition to Motions for Summary Judgment	5.80	4,495.00
02/29/20 ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with EBW; Brent Weisenberg; WMM and GSL regarding summary judgment papers	.50	387.50
02/29/20 EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions for summary judgment.	2.50	2,012.50
02/29/20 EBW	Preparation for Deposition Beechwood - preparation for Nordlicht deposition.	2.50	2,012.50
02/29/20 GSL	Research re Memorandum Continued research - re summary judgment	2.00	720.00

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02/29/20	GSL	Preparation of Memorandum Re bullet point summaries for brief	2.20	792.00
02/29/20	JKH	Review/analyze Beechwood - review transcripts re: Bodner and Huberfeld roles	2.40	732.00
02/29/20	JKH	Review/analyze Beechwood - review draft MOL in response to summary judgment motions	1.60	488.00
02/29/20	JKH	Review/analyze Beechwood - review statement of facts re: exhibits	3.50	1,067.50
02/29/20	WMM	Legal services/Legal Papers Team call concerning comments to brief; drafting Facts section of brief.	6.50	5,817.50
03/01/20	ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motions for summary judgment	6.60	5,115.00
03/01/20	ASH	Analysis of Legal Papers Analyze statements of undisputed facts	.80	620.00
03/01/20	ASH	Research re Opposing brief for motion Memorandum of Law in Opposition to Motions for Summary Judgment	1.20	930.00

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03/01/20 EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions for summary judgment.	3.00	2,415.00
03/01/20 EBW	Preparation for Deposition Beechwood - preparation for Nordlicht deposition.	3.50	2,817.50
03/01/20 GSL	Preparation of Memorandum Re bullet point summaries for brief (opposition to motions)	1.60	576.00
03/01/20 GSL	Research re Memorandum Research - re motions for summary judgment	1.30	468.00
03/01/20 JKH	Review/analyze Beechwood - review SOF re: exhibits	2.70	823.50
03/01/20 JKH	Review/analyze Beechwood - review WMM section of MOL re: exhibits	2.30	701.50
03/01/20 WMM	Preparation of Legal Papers Continue drafting facts section of brief.	2.50	2,237.50
03/01/20 WMM	Legal services/Client Communications concerning Nordlicht deposition postponement and call to court.	.50	447.50

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03/02/20 ASH	Telephone Call(s) w/Court Conference call with court regarding timing of motions for summary judgment	.40	310.00
03/02/20 ASH	Research re Opposing brief for motion Legal research and analyze caselaw regarding issues relating to motions for summary judgment	1.70	1,317.50
03/02/20 ASH	Examine Documents Analyze portions of expert witness reports relevant to motions for summary judgment	.60	465.00
03/02/20 ASH	Preparation of Opposing brief for motion Memorandum of Law in Opposition to Motions for Summary Judgment	5.90	4,572.50
03/02/20 ASH	Analysis of Memorandum From GSL regarding legal research issues relating to motions for summary judgment	.30	232.50
03/02/20 ASH	Telephone Call(s) w/Adversary Conference call with all counsel regarding timing of motions for summary judgment and Nordlicht deposition	.50	387.50
03/02/20 ASH	Analysis of Opposing brief for motion Analyze and comment on factual sections of memorandum of law in opposition to motions for summary judgment prepared by WMM	.50	387.50

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03/02/20	ASH	Analysis of Legal Papers Analyze SHIP's Rule 56.1 statement in support of motion for summary judgment	.50	387.50
03/02/20	ASH	Analysis of Correspondence Analyze comments on motion for summary judgment	.40	310.00
03/02/20	EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions for summary judgment.	10.50	8,452.50
03/02/20	EBW	Telephone Call(s) Beechwood - teleconferences with other parties regarding deposition.	.30	241.50
03/02/20	ACS	Conference(s) w/ CoCounsel - Other Meet with ASH re opposition to summary judgment motions	1.00	910.00
03/02/20	ACS	Review/correct Legal Papers Review and comment on Statement of Facts	1.20	1,092.00
03/02/20	GSL	Review/correct Memorandum	6.50	2,340.00
03/02/20	GSL	Research re Memorandum Continued research - re motions for summary judgment	.80	288.00

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03/02/20	JKH	Review/analyze Beechwood - review transcripts re: MOL	1.50	457.50
03/02/20	JKH	Document Review Beechwood - document searches related to MOL	.60	183.00
03/02/20	WMM	Preparation of Legal Papers Prepare brief; reviewing SEC comments for same; and continue drafting and revising arguments and SOF.	7.90	7,070.50
03/02/20	WMM	Legal services/Client Communicatons concerning scheduling Nordlicht deposition.	.50	447.50
03/03/20	ASH	Examine Documents Analyze documents relating to fair equivalent issue	1.30	1,007.50
03/03/20	ASH	Preparation of Opposing brief for motion Prepare memorandum of law in opposition to motions for summary judgment filed by Senior Health Insurance Company of Pennsylvania; Beechwood and PBIHL	5.80	4,495.00
03/03/20	ASH	Telephone Call(s) w/CoCounsel - Other Conference call with David Prager regarding expert issues	.50	387.50

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03/03/20 ASH	Conference(s) w/ CoCounsel - Other Meetings with EBW; Brent Weisenberg; WMM and Trey Rogers regarding papers	2.60	2,015.00
03/03/20 ASH	Analysis of Memorandum Analyze memos from GSL regarding legal research issues relating to motions for summary judgment	.50	387.50
03/03/20 ASH	Analysis of Legal Papers Review drafts of statement of undisputed facts	.50	387.50
03/03/20 EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions for summary judgment.	11.00	8,855.00
03/03/20 EBW	Telephone Call(s) Beechwood - teleconference with Receiver and SEC.	.50	402.50
03/03/20 ACS	Review/correct Legal Papers Continued review and insertion of comments in 56.1 statement	1.10	1,001.00
03/03/20 ACS	Telephone Call(s) w/CoCounsel - Other Meet with EBW and WSM and telecon Receiver; A Grace and N Jacobson	.80	728.00
03/03/20 GSL	Conference(s) re Brief for motion Re motions for summary judgment	.60	216.00

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03/03/20 GSL	Review/correct Memorandum Re motions for summary judgment	3.50	1,260.00
03/03/20 GSL	Research re Memorandum Re motions for summary judgment	1.80	648.00
03/03/20 JKH	Review Documents Beechwood - review SOF and prepare transcript excerpt exhibits	4.10	1,250.50
03/03/20 JKH	Review/analyze Beechwood - review MOL for transcript excerpts	2.30	701.50
03/03/20 WMM	Preparation of Legal Papers Continue revising SOF portion of brief; team conference drafting papers.	9.50	8,502.50
03/04/20 ASH	Telephone Call(s) w/CoCounsel - Other David Prager; EBW; Brent Weisenberg and Trey Rogers regarding expert issues	.60	465.00
03/04/20 ASH	Preparation of Opposing brief for motion Memorandum of Law in Opposition to Motions for Summary Judgment filed by SHIP; the Beechwood Entities and PBIH	5.80	4,495.00
03/04/20 ASH	Conference(s) w/ CoCounsel - Other Meetings with Brent Weisenberg; EBW; WMM; ACS and Trey Rogers regarding papers in oppositon to motions for summary judgment	2.20	1,705.00

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03/04/20 ASH	Correspondence w/CoCounsel - Other to David Prager regarding expert issues relating to opposition to motions for summary judgment	.60	465.00
03/04/20 ASH	Examine Documents Analyze and assemble documents relating to expert issues	1.70	1,317.50
03/04/20 ASH	Examine Documents Exhibits to Declarations in Opposition to Motions for Summary Judgment from JKH and GSL	.60	465.00
03/04/20 ASH	Analysis of Memorandum Research memos from GSL and related cases	.50	387.50
03/04/20 ASH	Analysis of Opposing brief for motion Analyze recent ACS comments on memorandum of law in opposition to motions for summary judgment	.40	310.00
03/04/20 EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions for summary judgment.	12.20	9,821.00
03/04/20 GSL	Review/correct Memorandum Citation review - re opposition to motions for summary judgment	4.60	1,656.00

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03/04/20 GSL	Preparation of Memorandum Re exhibits (opposition to motions for summary judgment)	9.00	3,240.00
03/04/20 JKH	Review/analyze Beechwood - edit SOF	1.50	457.50
03/04/20 JKH	Review/analyze Beechwood - review exhibits to SOF re: transcripts	3.40	1,037.00
03/04/20 JKH	Review/analyze Beechwood - prepare transcript excerpt exhibits	2.10	640.50
03/04/20 JKH	Review/analyze Beechwood - review excerpts in SOF accuracy	4.30	1,311.50
03/04/20 JKH	Prepare Legal Papers Beechwood - prepare exhibits for filing	2.30	701.50
03/04/20 JKH	Review/analyze Beechwood - edit SOF	1.10	335.50
03/04/20 WMM	Preparation of Legal Papers Team conference revising motion papers.	8.50	7,607.50
03/04/20 WMM	Legal services/Client Communications concerning Nordlicht deposition.	.50	447.50

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03/05/20 ASH	Preparation of Opposing brief for motion Portions of brief in opposition to motions for summary judgment regarding specific legal points	4.20	3,255.00
03/05/20 ASH	Review/correct Legal Papers Rule 56.1. Statement	4.60	3,565.00
03/05/20 ASH	Preparation of Legal Papers Select exhibits to Rogers and Weinick declarations (more than 100)	5.90	4,572.50
03/05/20 ASH	Research re Legal Papers Caselaw regarding issues regarding opposition to motions for summary judgment	.60	465.00
03/05/20 ASH	Conference(s) w/ CoCounsel - Other Meetings with EBW; WMM; Brent Weisenberg and Trey Rogers regarding opposition to defendants' motions for summary judgment	1.10	852.50
03/05/20 ASH	Conference(s) w/ CoCounsel - Other Meetings with ACS and ASG regarding responding papers and legal research	.40	310.00
03/05/20 ASH	Review/correct Opposing aff for motion Declaration of Trey Rogers in opposition to motions for summary judgment	1.50	1,162.50
03/05/20 ASH	Analysis of Legal Papers Comments from ACS regarding brief	.40	310.00

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03/05/20 ASH	Correspondence w/CoCounsel - Other Comments on papers to EBW; WMM Brent Weisenberg and Trey Rogers	.30	232.50
03/05/20 EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions for summary judgment.	14.50	11,672.50
03/05/20 ACS	Review/correct Opposing brief for motion Review and insert comments into revised opp to SHIP motion	2.10	1,911.00
03/05/20 ACS	Conference(s) w/ CoCounsel - Other Meet with ASH and AMD re research for opposition to SHIP motion	.50	455.00
03/05/20 ACS	Review/correct Legal Papers Review and insert comments into Statement of Facts	1.80	1,638.00
03/05/20 GSL	Preparation of Memorandum Re opposition to motions for summary judgment	14.50	5,220.00
03/05/20 AMD	Research re Client Researched cases explaining how to demonstrate element of knowledge under affirmative defense to fraudulent conveyance.	2.60	767.00

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03/05/20	WMM	Preparation of Legal Papers Team conference to draft and revise motion papers; and attention to exhibits.	11.50	10,292.50
03/05/20	WMM	Legal services/Client More communications concernring Nordlicht deposition.	.20	179.00
03/06/20	ASH	Preparation of Opposing aff for motion Revise Trey Rogers Declaration	2.10	1,627.50
03/06/20	ASH	Conference(s) w/ CoCounsel - Other Meetings with EBW; WMM; Trey Rogers and Brent Weisenberg regarding finalizing papers	.70	542.50
03/06/20	ASH	Preparation of Legal Papers Response to SHIP's Rule 56.1 statement	3.80	2,945.00
03/06/20	ASH	Preparation of Legal Papers Exhibits for summary judgment motion	1.10	852.50
03/06/20	EBW	Preparation of Legal Papers Beechwood - preparation of opposition to motions for summary judgment.	16.00	12,880.00
03/06/20	GSL	Preparation of Memorandum Re opposition to motions for summary judgment	17.80	6,408.00

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03/06/20 WMM	Preparation of Legal Papers Reviewing drafts; team conference to revise and finalize motion papers and finalize same.	7.40	6,623.00
03/07/20 ASH	Analysis of Opposing brief for motion SHIP's memorandum of law in opposition to the Receiver's motion for partial summary judgment on the issues of agency and imputation	.70	542.50
03/07/20 ASH	Analysis of Legal Papers Statement of facts filed by SHIP in opposition to the Receiver's motion for partial summary judgment on issues of agency and imputation	.60	465.00
03/07/20 ASH	Analysis of Legal Papers Final papers filed by the Receiver in opposition to SHIP's; the Beechwood parties' and PBIHL's motions for summary judgment	.70	542.50
03/08/20 WMM	Legal services/Legal Papers Reviewing opposition to SJ on agency and communications concerning same.	1.50	1,342.50
03/09/20 EBW	Conference(s) In Office Beechwood - conference with W. Moran and B. Weisenberg regarding reply papers.	.40	322.00

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03/09/20	EBW	Analysis of Legal Papers Beechwood - analysis of issues relating to PBIH 56.1	.40	322.00
03/09/20	EBW	Preparation of Legal Papers Beechwood - preparation of reply in further support of summary judgment motion as to agency.	6.80	5,474.00
03/09/20	WMM	Legal services/Legal Papers Team conference concerning SHIP opposition and issues for Reply; analyze opposiiton papers and reviewing cases cited.	4.40	3,938.00
03/10/20	EBW	Preparation of Legal Papers Beechwood - preparation of reply in further support of summary judgment motion as to agency.	6.10	4,910.50
03/10/20	EBW	Telephone Call(s) Beechwood - teleconferences with counsel for SHIP.	.20	161.00
03/10/20	EBW	Telephone Call(s) Beechwood - teleconference with Court regarding briefing.	.30	241.50
03/10/20	GSL	Research re Memorandum Review of Rakoff decisions in Platinum-Beechwood litigation - re reply to SHIP opposition	.90	324.00

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03/10/20 GSL	Research re Memorandum Reviewed cases cited by SHIP in opposition to MSJ	5.20	1,872.00
03/10/20 GSL	Review file re Memorandum Prepared binder for Receiver - re motions for summary judgment	1.20	432.00
03/10/20 WMM	Legal services/Client Communications concerning application to extend page limit and due date for filing.	.50	447.50
03/10/20 WMM	Legal services/Legal Papers Reviewing draft Reply and provide comments; reviewing chart of cases; reviewing cases.	4.60	4,117.00
03/11/20 EBW	Preparation of Legal Papers Beechwood - preparation of reply in further support of summary judgment motion as to agency.	7.10	5,715.50
03/11/20 EBW	Telephone Call(s) Beechwood - teleconference with Receiver; ACS and SEC regarding items of common interest.	.40	322.00
03/11/20 EBW	Correspondence Beechwood - attention to issues regarding Nordlicht deposition.	.20	161.00

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03/11/20 ACS	Analysis of Opposing brief for motion Review and annotate SHIP opposition to summary judgment motion	1.40	1,274.00
03/11/20 ACS	Telephone Call(s) w/CoCounsel - Other Meet with EBW and telecon Receiver and N Jacobson re status and strategy	.30	273.00
03/11/20 GSL	Research re Memorandum Reviewed/summarized cases cited by SHIP in opposition	5.50	1,980.00
03/11/20 JKH	Review/analyze Beechwood - review of response to MSJ	1.30	396.50
03/11/20 WMM	Legal services/Legal Papers Analyzing draft Reply and cases; communications concerning same.	4.10	3,669.50
03/12/20 ASH	Analysis of Correspondence Recent correspondence with court regarding page limits and deadlines	.20	155.00
03/12/20 EBW	Preparation of Legal Papers Beechwood - preparation of reply in further support of summary judgment motion as to agency.	8.20	6,601.00
03/12/20 EBW	Telephone Call(s) Beechwood - teleconference with Court and counsel regarding Nordlicht deposition.	.20	161.00

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03/12/20	GSL	Research re Memorandum Research - re reply to SHIP opposition on MSJ	3.00	1,080.00
03/12/20	GSL	Review file re Memorandum Reviewed SHIP's proof of claim and SHIP SAC	1.20	432.00
03/12/20	GSL	Review/correct Memorandum re - Reply to SHIP opposition to MSJ	3.70	1,332.00
03/12/20	JKH	Prepare Legal Papers Beechwood - prepare document binders for oral argument	1.70	518.50
03/12/20	WMM	Legal services/Legal Papers Analyze and revise Reply; communications concerning same.	4.50	4,027.50
03/13/20	EBW	Preparation of Legal Papers Beechwood - preparation of reply in further support of summary judgment motion as to agency.	6.50	5,232.50
03/13/20	GSL	Review/correct Memorandum Re reply to SHIP opposition to MSJ	.80	288.00
03/13/20	JKH	Prepare Legal Papers Beechwood - review documents and prepare document binders for oral argument	2.70	823.50

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03/13/20 WMM	Legal services/Legal Papers Analyze and revise draft brief; communications concerning editing to page limit; edit draft and communications concerning same.	4.80	4,296.00
03/14/20 ACS	Review/correct Reply brief for motion Review draft reply on agency summary judgment motion and insert comments	1.80	1,638.00
03/15/20 ASH	Analysis of Correspondence Papers in related case that relate to motions for summary judgment	.20	155.00
03/15/20 EBW	Preparation of Legal Papers Beechwood - revisions to summary judgment reply brief.	2.10	1,690.50
03/15/20 GSL	Research re Memorandum Research - re reply to SHIP opposition to MSJ	3.80	1,368.00
03/16/20 ASH	Preparation of e-mail(s) Review emails regarding papers; idea regarding papers	.20	155.00
03/16/20 EBW	Preparation of Legal Papers Beechwood - preparation of reply brief.	6.80	5,474.00

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03/16/20	GSL	Research re Memorandum Research - re reply to SHIP opposition to agency MSJ	2.00	720.00
03/16/20	GSL	Review/correct Memorandum Re - reply to SHIP opposition to agency MSJ	5.70	2,052.00
03/16/20	GSL	Correspondence Platinum-Beechwood Team Call - re reply to SHIP opposition (MSJ)	.30	108.00
03/16/20	JKH	Diary & Docket Beechwood - calendar Nordlicht depo date and related information	.10	30.50
03/16/20	JKH	Review/analyze Beechwood - review reply brief in support of MSJ	.60	183.00
03/16/20	WMM	Legal services/Client Review and revise Reply brief and team meetings concerning same.	4.50	4,027.50
03/17/20	ASH	Telephone Call(s) w/CoCounsel - Other Adam Silverstein regarding issues relating to motions	.20	155.00
03/17/20	ASH	Analysis of Reply brief for motion Beechwood parties' reply brief in support of motion for summary judgment	.30	232.50

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03/17/20 EBW	Preparation of Legal Papers Beechwood - finalization of reply brief.	5.20	4,186.00
03/17/20 EBW	Correspondence Beechwood - correspondence with other parties and court.	.30	241.50
03/17/20 EBW	Analysis of Legal Papers Beechwood - review of filings.	.60	483.00
03/17/20 ACS	Analysis of Legal Papers Review Receiver's reply on partial summary judgment motion	.40	364.00
03/17/20 GSL	Review/correct Memorandum Reply in Further Support of Agency MSJ against SHIP (prep for filing)	3.40	1,224.00
03/17/20 GSL	Telephone Call(s):Reply brief for motion Platinum-Beechwood team call - re filing Reply in further support of agency MSJ	.40	144.00
03/17/20 GSL	Analysis of Reply Replies of SHIP; Beechwood and PBIH in further support of MSJ	1.50	540.00
03/17/20 JKH	Conference call(s) Beechwood - conference call re: filing of Reply in Support of MSJ	.40	122.00

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03/17/20	JKH	Review Documents Beechwood - review reply brief in support of MSJ for filing	.30	91.50
03/17/20	JKH	Review/analyze Beechwood - review PB reply in support of MSJ	.40	122.00
03/17/20	JKH	Correspondence Beechwood - review emails re: Nordlicht deposition; calendaring related calls	.20	61.00
03/17/20	JKH	Review/analyze Beechwood - review of SHIP's reply in support of summary judgment	.80	244.00
03/17/20	JKH	Review/analyze Beechwood - review of replies in support of summary judgment and circulating same to team	.30	91.50
03/17/20	WMM	Preparation of Legal Papers Analyzing draft Reply to SHIP and revising same; team conference concerning revisions; final review and finalize.	5.10	4,564.50
03/17/20	WMM	Analysis of Legal Papers Reviewing reply briefs from PB; Beechwood and SHIP and communications concerning same.	2.20	1,969.00

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03/18/20 ASH	Analysis of Reply brief for motion Review SHIP's reply memorandum in support of motion for summary judgment	1.10	852.50
03/18/20 ASH	Analysis of Legal Papers SHIP's 56.1 Statement in Support of Motion for Summary Judgment	.90	697.50
03/18/20 ASH	Preparation of e-mail(s) Numerous emails to WMM; EBW; Brent Weisenberg and GSL regarding upcoming meetings	.30	232.50
03/18/20 EBW	Analysis of Legal Papers Beechwood - review of other parties' summary judgment papers.	3.80	3,059.00
03/18/20 EBW	Telephone Call(s) Beechwood - teleconference with court regarding Nordlicht deposition.	.20	161.00
03/18/20 ACS	Analysis of Legal Papers Review papers on SHIP motion for summary judgment	3.40	3,094.00
03/18/20 GSL	Analysis of Reply Re motions for summary judgment against the Receiver	1.10	396.00

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03/18/20	JKH	Review Documents Beechwood - review of all summary judgment motions	1.40	427.00
03/18/20	JKH	Review/analyze Beechwood - review PB reply in support	.40	122.00
03/18/20	WMM	Analysis of Legal Papers Continue analysis of SHIP's Reply and communications concerning same.	2.80	2,506.00
03/18/20	WMM	Analysis of Legal Papers Analysis of SHIP's counter statement of facts for use at oral argument; communications concerning same.	3.30	2,953.50
03/19/20	ASH	Telephone Call(s) w/CoCounsel - Other with EBW; WMM; Brent Weisenberg and GSL regarding settlement possibilities	.80	620.00
03/19/20	ASH	Review/correct Legal Papers Revise charts regarding litigation issues; emails to Brent Weisenberg; EBW and WMM regarding same	1.20	930.00
03/19/20	ASH	Analysis of Deposition Analyze documents for possible use at Mark Nordlicht's deposition	.70	542.50

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03/19/20 EBW	Telephone Call(s) Beechwood - teleconference with litigation team regarding strategy.	.90	724.50
03/19/20 EBW	Preparation for Court (motion) Beechwood - preparation for oral argument.	2.30	1,851.50
03/19/20 EBW	Preparation for Deposition Beechwood - preparation for Nordlicht deposition.	1.50	1,207.50
03/19/20 ACS	Analysis of Legal Papers Continued review of cross motions for summary judgment to analyze merits	1.30	1,183.00
03/19/20 GSL	Telephone Call(s) re: Court (motion) Platinum-Beechwood Team Call - re oral argument/Nordlicht deposition	.80	288.00
03/19/20 GSL	Preparation for Argument Review of Rakoff's individual rules - re oral argument	.50	180.00
03/19/20 GSL	Review file re Reply Motions for summary judgment against the Receiver - re oral argument prep team call	.50	180.00
03/19/20 JKH	Preparation for Deposition Beechwood - prepare for Nordlicht deposition	.80	244.00

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03/19/20 WMM	Analysis of Legal Papers Analyzing all Reply papers in preparation for team conference; participate in team conference concerning motions and strategy.	3.50	3,132.50
03/19/20 WMM	Legal services/Client Communications concerning Nordlicht deposition and court conference.	.50	447.50
03/19/20 WMM	Legal services/Client Analyze memo concerning analysis of SJ motions.	.50	447.50
03/20/20 ASH	Preparation of Legal Papers Prepare updated litigation analysis	4.80	3,720.00
03/20/20 ASH	Analysis of Brief for motion Analyze SHIP's memorandum of law in support of motion to dismiss	.90	697.50
03/20/20 ASH	Analysis of Reply brief for motion Analyze reply memorandum filed by SHIP in support of motion for summary judgment	.80	620.00
03/20/20 ASH	Correspondence w/CoCounsel - Other with Brent Weisenberg; EBW and WMM regarding analysis of litigation issues	.40	310.00
03/20/20 EBW	Preparation for Court (motion) Beechwood - preparation for oral argument.	2.00	1,610.00

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03/20/20 EBW	Preparation for Deposition Beechwood - preparation for Nordlicht deposition.	1.80	1,449.00
03/20/20 WMM	Legal services/Client Analyze settlement memo and numerous communication concerning same.	1.90	1,700.50
03/22/20 JKH	Preparation for Deposition Beechwood - Prepare for video deposition re: Nordlicht	1.00	305.00
03/23/20 ASH	Review/correct Memorandum Chart describing claims and defenses	4.50	3,487.50
03/23/20 ASH	Examine Documents Documents regarding underlying transactions	.90	697.50
03/23/20 EBW	Telephone Call(s) Beechwood - teleconference with B. Weisenberg regarding strategy.	.40	322.00
03/23/20 EBW	Telephone Call(s) Beechwood - teleconference with all counsel regarding summary judgment.	.40	322.00
03/23/20 EBW	Preparation for Deposition Beechwood - preparation for Nordlicht deposition.	2.10	1,690.50

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03/23/20 EBW	Analysis of Legal Papers Beechwood - review of summary judgment pleadings.	2.50	2,012.50
03/23/20 ACS	Analysis of Legal Papers Continued review of SHIP summary judgment motion papers to assess merits	.40	364.00
03/23/20 JKH	Preparation for Deposition Beechwood - prepare and review electronic exhibits for Nordlicht deposition	1.70	518.50
03/23/20 WMM	Preparation for Conference Analyzing ASH memo concerning case analysis and communications concerning same	1.60	1,432.00
03/23/20 WMM	Legal services/Client Communications concerning deposition of Nordlicht and participate in same.	.50	447.50
03/23/20 WMM	Legal services/Client Numerous communications and conference call of counsel concerning call to court to discuss oral argument.	.40	358.00
03/23/20 WMM	Legal services/Client Communications among counsel concerning Nordlicht deposition.	.30	268.50

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03/23/20 WMM	Legal services/Legal Papers Receive revised ASH memo and analyze same; communications and preparation for strategy call with Receiver tomorrow.	1.80	1,611.00
03/23/20 WMM	Legal services/Client Communications with court concerning oral argument by telephone and communications concerning same.	.30	268.50
03/24/20 ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with ACS regarding factual and legal issues	.90	697.50
03/24/20 ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with Receiver; EBW; WMM; Brent Weisenberg and ACS regarding issues relating to Beechwood case	1.00	775.00
03/24/20 ASH	Research re Legal Papers Review statutory framework under the Debtor & Creditor Law to prepare for telephone call with Receiver; ACS; EBW; WMM and Brent Weisenberg regarding settlement	.40	310.00
03/24/20 ASH	Preparation of e-mail(s) To ACS regarding factual and legal issues relating to upcoming argument; analyze documents regarding same	.40	310.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/24/20	EBW	Telephone Call(s) Beechwood - strategy teleconferences with W. Moran.	.50	402.50
03/24/20	EBW	Telephone Call(s) Beechwood - strategy teleconference with Receiver and litigation team.	1.10	885.50
03/24/20	EBW	Preparation for Deposition Beechwood - preparation for Nordlicht deposition.	1.50	1,207.50
03/24/20	EBW	Correspondence Beechwood - correspondence with SEC regarding items of mutual interest.	.30	241.50
03/24/20	EBW	Preparation for Court (motion) Beechwood - preparation for strategy sessions and oral argument.	2.10	1,690.50
03/24/20	ACS	Analysis of Legal Papers Continued review of motion papers and review Prager report to assess merits	3.00	2,730.00
03/24/20	ACS	Telephone Call(s) w/CoCounsel - Other Telecon Receiver; EBW; WMM; ASH and B Weisenberg re strategy	1.00	910.00
03/24/20	JKH	Preparation for Deposition Beechwood - prepare electronic exhibits for Nordlicht deposition	1.20	366.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/24/20	JKH	Review Documents related to SEC request	.20	61.00
03/24/20	WMM	Legal services/Client Prepare for and participate in conference concerning settlement; communications concerning strategy.	2.90	2,595.50
03/25/20	ASH	Examine Documents Analyze prior correspondence regarding discovery; email to JKH regarding same	.30	232.50
03/25/20	ASH	Telephone Call(s) w/CoCounsel - Other With EBW regarding possible letter to opposing counsel	.20	155.00
03/25/20	EBW	Telephone Call(s) Beechwood - teleconference with Receiver; A. Silverstein and SEC regarding items of common interest.	1.00	805.00
03/25/20	EBW	Telephone Call(s) Beechwood - teleconference with litigation team following SEC call.	.30	241.50
03/25/20	EBW	Preparation for Conference Beechwood - preparation for teleconference with Receiver; A. Silverstein and SEC regarding items of common interest.	1.00	805.00

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03/25/20	EBW	Preparation for Deposition Beechwood - preparation for Nordlicht deposition.	3.00	2,415.00
03/25/20	EBW	Telephone Call(s) Beechwood - teleconference with counsel for PPVA regarding items of common interest.	.50	402.50
03/25/20	ACS	Telephone Call(s) w/CoCounsel - Other Telecon A Bambach; N Jacobson; A Grace; Receiver and EBW re summary judgment and settlement	1.00	910.00
03/25/20	GSL	Research re Court (motion) Researched/reviewed transcripts from proceedings before Rakoff - re oral argument prep	1.70	612.00
03/25/20	GSL	Research re Court (motion) Prepared summary of research - re transcripts from proceedings before Rakoff	.70	252.00
03/25/20	JKH	Preparation for Deposition Beechwood - preparing and sending electronic exhibits in advance of Nordlicht deposition	.60	183.00
03/25/20	JKH	Research Beechwood - email research regarding document productions	2.30	701.50

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03/25/20 JKH	Preparation for Deposition Beechwood - prepare documents for Nordlicht deposition	.30	91.50
03/25/20 JKH	Correspondence Beechwood - respond to emails regarding Nordlicht exhibits	.20	61.00
03/25/20 JKH	Preparation for Deposition Beechwood - review documents in preparation for Nordlicht deposition	.40	122.00
03/25/20 WMM	Legal services/Client Communications concerning conference with SEC and Nordlicht deposition; reviewing documents in preparation for Nordlicht deposition.	1.50	1,342.50
03/26/20 ASH	Telephone Call(s) w/CoCounsel - Other With EBW; WMM and Brent Weisenberg regarding deposition and further tasks on case	.50	387.50
03/26/20 ASH	Correspondence w/CoCounsel - Other Explanation of transactions at issue	2.30	1,782.50
03/26/20 ASH	Examine Documents Documents regarding transactions for use in later stages of proceedings	.90	697.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/26/20 EBW	Attend at Exam. B/T Beechwood - attend and take Nordlicht deposition.	8.80	7,084.00
03/26/20 EBW	Preparation for Deposition Beechwood - preparation for Nordlicht deposition.	1.20	966.00
03/26/20 EBW	Telephone Call(s) Beechwood - post deposition teleconference with litigation team.	.80	644.00
03/26/20 JKH	Preparation for Deposition Beechwood - preparing and sending exhibits to court reporter for Nordlicht deposition	.20	61.00
03/26/20 JKH	Review Documents Beechwood - review and download other parties' deposition exhibits in advance of Nordlicht deposition	.30	91.50
03/26/20 WMM	Legal services/Client Team conference concerning same and application to court for supplemental briefing and potential motion to compel; communications with counsel and court for conference to discuss same tomorrow.	1.20	1,074.00
03/26/20 WMM	Legal services/Client Prepare for and participate in deposition of M. Nordlicht	8.80	7,876.00

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03/27/20 ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with EBW; WMM; Brent Weisenberg; GSL and JKH regarding status and tasks to be performed	.70	542.50
03/27/20 ASH	Examine Documents Analyze documents regarding facts relating to questions raised by the SEC	2.10	1,627.50
03/27/20 ASH	Correspondence w/CoCounsel - Other to SEC regarding common interest issues	2.20	1,705.00
03/27/20 ASH	Telephone Call(s) w/CoCounsel - Other EBW regarding issues relating to case	.30	232.50
03/27/20 ASH	Analysis of Correspondence from opposing counsel regarding issues relating to case	.70	542.50
03/27/20 ASH	Correspondence w/CoCounsel - Other to Trey Rogers regarding factual issue	.20	155.00
03/27/20 EBW	Telephone Call(s) Beechwood - teleconference with litigation team regarding status and strategy.	.80	644.00
03/27/20 EBW	Telephone Call(s) Beechwood - teleconference with Court regarding Nordlicht deposition.	.40	322.00

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03/27/20	EBW	Correspondence Beechwood - correspondence with SEC regarding items of common interest.	.70	563.50
03/27/20	EBW	Correspondence Beechwood - analysis of correspondence from SHIP.	1.70	1,368.50
03/27/20	EBW	Analysis of Legal Papers Beechwood - analysis of summary judgment issues; including Nordlicht deposition issues.	1.40	1,127.00
03/27/20	GSL	Review file re Deposition Reviewed Nordlicht depo rough draft	1.30	468.00
03/27/20	GSL	Telephone Call(s) re: Deposition Platinum-Beechwood Team Call - re Nordlicht Depo / supplemental brief / oral argument prep	.60	216.00
03/27/20	GSL	Analysis/Strategy Research on 5th Amendment adverse inference - re supplemental brief	2.40	864.00
03/27/20	GSL	Research re Court (motion) Prepared summary of research - 5th Amendment supplemental brief	1.60	576.00

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03/27/20 GSL	Analysis of Notice of motion Re Notice of Motion and Rule 11 Letter from SHIP	.30	108.00
03/27/20 JKH	Review/analyze Beechwood - review SHIP letter dated 3/27	.80	244.00
03/27/20 JKH	Conference call(s) Beechwood - conference call re: next steps for oral argument and trial	.70	213.50
03/27/20 JKH	Review/analyze Beechwood - review docket regarding settlements entered into by SHIP; prepare summary chart regarding same	1.40	427.00
03/27/20 JKH	Review/analyze Beechwood - review and profile Nordlicht transcript	.20	61.00
03/27/20 JKH	Review/analyze Beechwood - review documents for upcoming oral argument	1.20	366.00
03/27/20 JKH	Diary & Docket Beechwood - calendar supplemental reply deadlines	.10	30.50

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03/27/20 WMM	Legal services/Client Prepare for and participate in team conference concerning adverse inference from Nordlicht deposition and strategy.	1.50	1,342.50
03/27/20 WMM	Legal services/Client Prepare for and participate in conference with court concerning supplementatl briefing; communications concerning same and decision from court.	1.10	984.50
03/27/20 WMM	Legal services/Client Analyze letter from counsel from SHIP; various communications concerning same and strategy.	3.50	3,132.50
03/29/20 ASH	Correspondence w/Adversary Draft correspondence to counsel for the Receiver of SHIP	3.60	2,790.00
03/29/20 ASH	Analysis of Correspondence Analyze draft letter from SHIP receiver; analyze prior correspondence with the SHIP Receiver and drafts of that correspondence	.80	620.00
03/29/20 ASH	Examine Documents Proofs of claim and documents regarding amount of debt	.50	387.50

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03/29/20	EBW	Correspondence Beechwood - correspondence with Receiver and litigation team regarding SHIP correspondence.	1.80	1,449.00
03/29/20	ACS	Analysis of Legal Papers Review settlement e-mail from SHIP receiver (.1) and SHIP letter (.7) and e-mail to Receiver and litigation team regardig strategic response (.3)	1.10	1,001.00
03/29/20	ACS	Correspondence w/CoCounsel - Other E-mails from/to Receiver; EBW and A Bambach re common interest issues	.40	364.00
03/29/20	WMM	Legal services/Client Analyzing communications concerning SHIP letter; analyzing draft email to rehabilitator and communications concerning same.	2.50	2,237.50
03/30/20	ASH	Preparation of Memorandum Regarding legal issues and related facts; spreadsheet regarding same	5.10	3,952.50
03/30/20	ASH	Telephone Call(s) w/CoCounsel - Other With Brent Weisenberg and EBW regarding issues relating to escrow monies	.30	232.50
03/30/20	ASH	Examine Documents Analyze documents and correspondence regarding case analyses	.60	465.00

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03/30/20 ASH	Preparation of e-mail(s) To Trey Rogers; Brent Weisenberg; Erik Weinick; Adam Silverstein regarding factual issues	.60	465.00
03/30/20 EBW	Correspondence Beechwood - correspondence and teleconferences with Receiver and litigation team regarding SHIP correspondence.	2.50	2,012.50
03/30/20 EBW	Preparation for Court (motion) Beechwood - preparation for summary judgment argument.	3.00	2,415.00
03/30/20 ACS	Review/correct Correspondence Review draft proposal letter to SHIP Receiver and comment on same	.30	273.00
03/30/20 ACS	Correspondence w/CoCounsel - Other E-mails from/to EBW and ASH re legal analysis	.30	273.00
03/30/20 GSL	Analysis/Strategy Research - re stipulation	1.60	576.00
03/30/20 JKH	Review Documents Beechwood - review docket and email communications related to settlement orders	.30	91.50

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03/30/20 WMM	Legal services/Client Communications continued concerning response to letter	2.90	2,595.50
03/30/20 WMM	Legal services/Client Communications concerning value of liens and calculations for same.	1.40	1,253.00
03/30/20 WMM	Legal services/Client Communications concerning minute entry of Judge's decision denying discovery of Saks settlement agreement with caveat; review same.	.50	447.50
03/30/20 WMM	Legal services/Client Communications of analysis and calculations of escrow and reviewing same.	.50	447.50
03/31/20 ASH	Telephone Call(s) w/CoCounsel - Other Conference call EBW; WMM; Brent Weisenberg and GSL regarding oral argument	.50	387.50
03/31/20 ASH	Telephone Call(s) w/CoCounsel - Other with Brent Weisenberg (.2); with Brent Weisenberg and Trey Rogers (.3)	.50	387.50
03/31/20 ASH	Analysis of Reply brief for motion SHIP's reply memorandum in support of motion for summary judgment	.50	387.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/31/20 ASH	Conference(s) w/ CoCounsel - Other Analysis of outcomes; analyze documents regarding same	3.80	2,945.00
03/31/20 ASH	Telephone Call(s) w/CoCounsel - Other with ACS and EBW regarding settlement strategy	.50	387.50
03/31/20 ASH	Preparation of e-mail(s) Numerous emails to Receiver and litigation team regarding factual issues relating to issues relating to litigation	.60	465.00
03/31/20 EBW	Telephone Call(s) Beechwood - correspondence and teleconference with Receiver and litigation team regarding SHIP correspondence. (EBW portion)	1.40	1,127.00
03/31/20 EBW	Telephone Call(s) Beechwood - teleconference with A. Silverstein and A. Halpern regarding SHIP correspondence.	.50	402.50
03/31/20 EBW	Telephone Call(s) Beechwood - teleconference with litigation team regarding strategy.	.50	402.50
03/31/20 EBW	Preparation for Conference Beechwood - preparation for teleconference with Receiver and SEC.	1.50	1,207.50

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03/31/20 EBW	Preparation for Court (motion) Beechwood - preparation for summary judgment hearing.	3.50	2,817.50
03/31/20 ACS	Analysis of Legal Papers Review ASH analysis of outcomes for strategy (.3) and e-mail follow up questions/observations to ASH (.2)	.50	455.00
03/31/20 ACS	Telephone Call(s) w/CoCounsel - Other Telecon Receiver and EBW (1) and EBW and ASH (.5) re strategy	1.50	1,365.00
03/31/20 GSL	Telephone Call(s) re: Court (motion) Platinum Team Call - re prep for oral argument	.50	180.00
03/31/20 GSL	Analysis of Reply Review arguments in SHIP Reply and cases cited	1.10	396.00
03/31/20 GSL	Research re Court (motion) Research for response to SHIP arguments on reply - re: oral argument	3.20	1,152.00
03/31/20 JKH	Review/analyze Beechwood - review cited cases in summary judgment motions	.70	213.50

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/31/20 JKH	Research Beechwood - review cited cases from summary judgment briefs	2.60	793.00
03/31/20 WMM	Legal services/Client Team meeting concerning oral argument; analyzing motion papers for same.	3.50	3,132.50
TOTAL PHASE P14		1,932. 60	\$1,285,354.00

Phase: P15

ARBITRATION

<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/02/20 ASH	Preparation of Mediation Statement Revise ACS's draft of mediation statement	1.10	852.50
01/02/20 ACS	Correspondence w/Adversary E-mail from D Cheifetz	.10	91.00
01/02/20 ACS	Correspondence w/CoCounsel - Other Draft e-mail to Panel	.40	364.00
01/02/20 ACS	Preparation of Legal Papers Draft mediation statement	3.90	3,549.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/03/20 ASH	Preparation of Mediation Statement Edit mediation statement	1.50	1,162.50
01/03/20 ACS	Review/correct Legal Papers Edit mediation statement per ASH comments	.80	728.00
01/04/20 ACS	Review/correct Legal Papers Edit mediation statement for confidential mediation	1.20	1,092.00
01/06/20 ACS	Review/correct Legal Papers Further edits to mediation statement per Receiver's comments	1.70	1,547.00
01/06/20 ACS	Review/correct Legal Papers Finalize mediation statement	1.10	1,001.00
01/06/20 ACS	Correspondence w/Adversary E-mail to J Bernard and D Cheifetz	.10	91.00
01/06/20 ACS	Correspondence w/CoCounsel - Other E-mail to audit expert	.10	91.00
01/06/20 ACS	Correspondence w/CoCounsel - Other E-mail to damages expert	.10	91.00
01/06/20 GSL	Review/correct Legal Papers Review of mediation statement	1.00	360.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/06/20 JKH	Diary & Docket Calendar multiple dates related to mediation and discovery	.30	91.50
01/09/20 ACS	Telephone Call(s) w/CoCounsel - Other Telecon L Seidman re PPVA	.40	364.00
01/10/20 ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with auditing standards expert and assistant to auditing standards expert	1.00	775.00
01/10/20 ACS	Telephone Call(s) w/CoCounsel - Other Telecon audit expert	1.00	910.00
01/13/20 ACS	Correspondence w/Adversary E-mail to J Bernard and D Cheifetz	.10	91.00
01/14/20 ASH	Telephone Call(s) w/CoCounsel - Other With ACS and assistant to auditing standards expert	1.50	1,162.50
01/14/20 ACS	Analysis of Legal Papers Review auditor mediation statement	.50	455.00
01/14/20 ACS	Correspondence w/CoCounsel - Other E-mail to damages expert	.10	91.00
01/14/20 ACS	Correspondence w/CoCounsel - Other E-mail to audit expert	.10	91.00

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01/14/20 ACS	Telephone Call(s) w/CoCounsel - Other Telecon T Rogers re audit question	.20	182.00
01/14/20 ACS	Telephone Call(s) w/CoCounsel - Other Meet with ASH and telecon audit expert	1.50	1,365.00
01/14/20 WMM	Legal services/Client Communicatons concerning mediation issues.	.50	447.50
01/16/20 ASH	Telephone Call(s) w/CoCounsel - Other Analyze respondents' mediation statement	.50	387.50
01/17/20 ASH	Telephone Call(s) w/CoCounsel - Other Telephone call with David Prager and ACS regarding damages	.70	542.50
01/17/20 ACS	Preparation for Conference Re-review draft valuation/forensic/damages report to prepare for call with expert	.50	455.00
01/17/20 ACS	Telephone Call(s) w/CoCounsel - Other Telecon valuation/forensic/damages expert	.80	728.00
01/19/20 ASH	Telephone Call(s) w/CoCounsel - Other Expert witness report of David Prager	1.10	852.50

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01/19/20 ASH	Correspondence w/CoCounsel - Other to David Prager and Trey Rogers regarding issues relating to damages	.50	387.50
01/19/20 ASH	Review/correct Correspondence Review communication from mediator; revise draft response; emails to ACS and MLC regarding same	.20	155.00
01/20/20 ASH	Research re Legal Papers Legal research regarding other cases in which respondents have been involved	1.10	852.50
01/21/20 ASH	Conference(s) w/ CoCounsel - Other Meet with Receiver and ACS to prepare for mediation	1.10	852.50
01/21/20 ASH	Preparation for Mediation Analyze expert reports; notice of arbitration; correspondence and other papers to prepare for arbitration; assemble papers for mediation	2.20	1,705.00
01/21/20 ASH	Examine Documents To ACS regarding draft expert witness reports	.30	232.50
01/21/20 ACS	Review/correct Legal Papers Review and mark up valuation/forensic/damages draft analysis	1.10	1,001.00

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01/21/20 ACS	Correspondence w/Adversary E-mails from/to D Cheifetz	.40	364.00
01/21/20 ACS	Conference(s) w/ Client Meet with Receiver; ASH and GSL to prepare for mediation	1.10	1,001.00
01/21/20 GSL	Analysis/Strategy Reviewed/summarized past research - re damages	1.00	360.00
01/21/20 GSL	Conference(s) in Office Team meeting - re mediation	1.10	396.00
01/22/20 ASH	Attendance at Mediation Attend mediation	7.80	6,045.00
01/22/20 ACS	Attendance at Conference All day auditor mediation	7.80	7,098.00
01/22/20 GSL	Attendance at Mediation	6.50	2,340.00
01/29/20 ACS	Correspondence w/Adversary E-mail to D Cheifetz re settlement agreement	.10	91.00
02/04/20 ACS	Correspondence w/Adversary E-mail to D Cheifetz	.10	91.00

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02/05/20 ACS	Telephone Call(s) w/CoCounsel - Other Telecon W Edwards re auditor	.10	91.00
02/06/20 ASH	Review/correct Settlement Agreement Analyze settlement agreement; email to ACS and MLC conveying comments regarding same	1.50	1,162.50
02/06/20 ASH	Analysis of Correspondence from counsel for respondents in arbitration regarding possible settlement	.20	155.00
02/06/20 ACS	Telephone Call(s) w/Adversary Telecon D Cheifetz	.30	273.00
02/12/20 ACS	Review/correct Settlement Agreement Review and mark up draft settlement agreement	1.20	1,092.00
02/12/20 ACS	Conference(s) w/ Client Meet with Receiver re auditor settlement	.30	273.00
02/13/20 ACS	Correspondence w/CoCounsel - Other E-mails to/from N Jacobson and A Bambach re issues of common interest	.40	364.00
02/14/20 ACS	Review/correct Settlement Agreement Edit auditor settlement agreement	1.80	1,638.00

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230 PARK AVENUE
NEW YORK, NY 10169-0075

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/18/20 ACS	Telephone Call(s) w/Adversary Telecon D Cheifetz re confidential settlement	.10	91.00
02/24/20 ACS	Correspondence w/Adversary E-mail to/from D Cheifetz re confidential settlement	.20	182.00
02/24/20 ACS	Telephone Call(s) w/Adversary E-mail to/from D Cheifetz re confidential settlement	.10	91.00
02/25/20 ACS	Preparation of Correspondence Draft letter to Judge Cogan re confidential settlement	1.50	1,365.00
02/25/20 ACS	Review/correct Correspondence Further edit letter to Judge Cogan per comments of Receiver and EBW re confidential arbitration	.30	273.00
02/26/20 ACS	Review/correct Correspondence Edit letter to Judge Cogan re confidential settlement	1.10	1,001.00
02/26/20 ACS	Correspondence w/Client E-mail to D Cheifetz re confidential arbitration	.10	91.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/26/20 ACS	Review/correct Settlement Agreement Further edit confidential arbitration settlement agreement	1.30	1,183.00
02/27/20 ASH	Analysis of Correspondence Analyze draft letter to Judge Cogan regarding prospective settlement and respondents' counsel's comments on same	.30	232.50
02/27/20 ACS	Review/correct Correspondence Review edits to proposed letter to Court re confidential arbitration settlement	.20	182.00
02/27/20 ACS	Correspondence w/Client Research confidentiality requirements in arbitration (.2) and e-mail to Receiver and ASH re same (.2)	.40	364.00
02/27/20 ACS	Correspondence w/CoCounsel - Other E-mail to K Byrne of SEC re confidential arbitration	.20	182.00
02/28/20 ASH	Review/correct Settlement Agreement Settlement Agreement	.90	697.50
02/28/20 ACS	Review/correct Correspondence Edit letter to Judge Cogan re confidential settlement per comments	.30	273.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/28/20 ACS	Correspondence w/CoCounsel - Other E-mail to N Jacobson re confidential settlement letter	.10	91.00
02/28/20 ACS	Review/correct Settlement Agreement Further edit confidential settlement agreement	.20	182.00
03/05/20 ACS	Correspondence w/Adversary E-mail to D Cheifetz re confidential settlement	.10	91.00
03/07/20 ASH	Analysis of Settlement Agreement Review revised drafts of settlement agreement and correspondence regarding same; email to Adam Silverstein regarding same	.60	465.00
03/08/20 ACS	Review/correct Settlement Agreement Review further revisions to confidential settlement agreement by auditor and make revisions to same	1.60	1,456.00
03/09/20 ACS	Review/correct Settlement Agreement Further review and edit revised draft of confidential settlement agreement	1.20	1,092.00
03/10/20 ACS	Conference(s) w/ Client Meet with MLC re confidential settlement agreement revisions	.50	455.00

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<u>DATE</u> <u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/10/20 ACS	Review/correct Settlement Agreement Edit confidential settlement agreement per discussion with Receiver (1) and e-mail to D. Cheifetz (.1)	1.10	1,001.00
03/11/20 ASH	Analysis of Settlement Agreement Analyze revised draft of settlement agreement; email to ACS regarding same	.50	387.50
03/11/20 ACS	Correspondence w/Adversary Review e-mail and draft revisions to confidential settlement agreement from D. Cheifetz (.2) and reply e-mail (.2)	.40	364.00
03/11/20 ACS	Correspondence w/Adversary E-mails from/to D. Cheifetz	.20	182.00
03/11/20 ACS	Telephone Call(s) w/Adversary Telecon D Cheifetz re confidential subpoena	.70	637.00
03/12/20 ACS	Review/correct Settlement Agreement Further edit confidential settlement	1.40	1,274.00
03/12/20 ACS	Correspondence w/Adversary E-mail to D Cheifetz re settlement	.40	364.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/13/20	ACS	Review/correct Settlement Agreement Review revised settlement agreement circulated by D. Cheifetz (.1); edit and finalize settlement agreement (.8); create redline against Cheifetz draft (.1) and e-mail to D. Cheifetz (.1)	1.10	1,001.00
03/13/20	ACS	Correspondence w/Adversary E-mails from/to D. Cheifetz re confidential settlement agreement	.20	182.00
03/23/20	ACS	Correspondence w/Adversary E-mail from/to D Cheifetz re confidential settlement	.20	182.00
03/24/20	ASH	Analysis of Settlement Agreement Review David Cheifetz's changes to settlement agreement and correspondence regarding same; review final settlement agreement; emails and telephone call with ACS regarding same	.90	697.50
03/24/20	ACS	Review/correct Settlement Agreement Review "final" changes to confidential settlement from D Cheifetz (.3) and e-mail to Receiver re same (.1)	.40	364.00
03/25/20	ACS	Review/correct Settlement Agreement Finalize confidential settlement agreement (.22) and e-mail to accountant's counsel (.1)	.30	273.00

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<u>DATE</u>	<u>ATTORNEY</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/28/20	ASH	Preparation of Legal Papers Portions of status reports relating to claim against auditor	1.20	930.00
03/28/20	ASH	Analysis of Correspondence Letter to Judge Cogan regarding approval of settlement and attachments	.30	232.50
03/31/20	ASH	Analysis of Settlement Agreement Analyze settlement agreement for upcoming deadlines; emails to MLC; GSL; JKH and AW regarding same (4)	.60	465.00
03/31/20	ACS	Correspondence w/Adversary E-mails from/to D Cheifetz	.20	182.00
03/31/20	ACS	Correspondence w/Adversary E-mails of settlement deliverables to D Cheifetz	.20	182.00
TOTAL PHASE P15			83.70	\$66,972.00
			TOTAL FOR SERVICES	\$1,573,188.00

EXHIBIT F

Expense Summary

**SUMMARY OF ACTUAL AND NECESSARY DISBURSEMENTS FOR THE
STATEMENT PERIOD OF
JANUARY 1, 2020 THROUGH MARCH 31, 2020**

Expense Category	Service Provider (if applicable)	Total Expenses ¹
Air Freight (Overnight Courier)	Federal Express	\$455.65
Conference Calls	West Unified (conference call service)	\$3,461.52
Electronic Research	Westlaw, Pacer	\$12,742.52
Laser Copies (\$.15 per page)		\$4,478.40
Outside Messenger	Champion Courier Inc.	\$54.00
Photocopies (\$.15 per page)		\$1,648.05
Telephone Calls (Tolls Only)		\$10.00
Travel – Out of Town – lodging, etc.	MLC – Hotel, Transportation, Meals in TX for Beechwood Meeting	\$1,260.44
TOTAL:		\$24,110.58

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

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DISBURSEMENTS FOR YOUR ACCOUNT

Laser Copies	105.75
Travel-Out of Town-lodging,etc	1,260.44
	<hr/>
TOTAL DISBURSEMENTS	1,366.19

EXHIBIT H

Otterbourg Expense Records

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

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DISBURSEMENTS FOR YOUR ACCOUNT

Laser Copies	4,372.65
Conference Call(s)	3,461.52
Electronic Research	12,742.52
Air Freight	455.65
Outside Messenger	54.00
Telephone Calls (tolls only)	10.00
Photocopies	1,648.05
	<hr/>
TOTAL DISBURSEMENTS	22,744.39

EXHIBIT I

Certification

Melanie L. Cyganowski
Adam C. Silverstein
OTTERBOURG P.C.
230 Park Avenue
New York, New York 10169
Telephone: (212) 661-9100
Facsimile: (212) 682-6104

Counsel to the Receiver

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X	
SECURITIES AND EXCHANGE COMMISSION,	:
	:
Plaintiff,	:
	:
-v-	:
PLATINUM MANAGEMENT (NY) LLC;	:
PLATINUM CREDIT MANAGEMENT, L.P.;	:
MARK NORDLICHT;	:
DAVID LEVY;	:
DANIEL SMALL;	:
URI LANDESMAN;	:
JOSEPH MANN;	:
JOSEPH SANFILIPPO; and	:
JEFFREY SHULSE,	:
	:
Defendants.	:
-----X	

No. 16-CV-6848 (BMC)

**CERTIFICATION IN SUPPORT OF ELEVENTH JOINT INTERIM APPLICATION OF
THE RECEIVER AND OTTERBOURG P.C. FOR ALLOWANCE OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED DURING
THE PERIOD JANUARY 1, 2020 THROUGH MARCH 31, 2020**

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 Eleventh Joint Interim Application of the Receiver and Otterbourg P.C. for Allowance of Compensation and Reimbursement of Expenses Incurred during the Period January 1, 2020 through March 31, 2020 (the “Eleventh Interim Application”).

3. To best of my knowledge, information, and belief formed after reasonable inquiry, the Eleventh 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 Eleventh Interim Application are based on the rates listed in the Fee Schedule (Exhibit B to the Application), subject to the discounts described in the Eleventh 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 Eleventh 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: May 8, 2020

/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 ELEVENTH JOINT INTERIM APPLICATION OF THE RECEIVER AND OTTERBOURG P.C. FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES INCURRED DURING THE PERIOD JANUARY 1, 2020 THROUGH MARCH 31, 2020

THIS MATTER coming before the Court on the Eleventh 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 January 1, 2020 Through March 31, 2020 (the “Eleventh Interim Application”)¹ [Dkt. No. ____]; and the Court having considered the Eleventh Interim Application and exhibits and other documents filed in support of the Eleventh Interim Application; and the Court having found that the Eleventh 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 Eleventh Interim Application.

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

ORDERED that the Receiver’s compensation for the Eleventh Application Period is allowed on an interim basis in the amount of \$102,206.40 (the “Allowed Receiver Fees”); and it is further

ORDERED that the fees requested by Otterbourg for the Eleventh Application Period are allowed on an interim basis in the amount of \$1,213,020.30 (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 Eleventh Application Period is allowed on an interim basis in the amount of \$1,366.19; and it is further

ORDERED that Otterbourg’s request for reimbursement of its out-of-pocket expenses for the Eleventh Application Period is allowed on an interim basis in the amount of \$22,744.39; 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.