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*Attorneys for Receiver Jonathan O. Hafen*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

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COMMODITY FUTURES TRADING  
COMMISSION, and STATE OF UTAH  
DIVISION OF SECURITIES, through  
Attorney General Sean D. Reyes,

Plaintiffs,

vs.

RUST RARE COIN INC., a Utah corporation,  
and GAYLEN DEAN RUST, an individual,  
DENISE GUNDERSON RUST, an individual,  
JOSHUA DANIEL RUST, an individual,

Defendants;

and

ALEESHA RUST FRANKLIN, an individual,  
R LEGACY RACING INC, a Utah  
corporation, R LEGACY ENTERTAINMENT  
LLC, a Utah limited liability company, and R  
LEGACY INVESTMENTS LLC, a Utah  
limited liability company.

Relief Defendants.

**EIGHTEENTH INTERIM FEE  
APPLICATION**

Civil No. 2:18-cv-00892-TC

Judge Tena Campbell

Magistrate Judge Dustin Pead

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Jonathan O. Hafen, the Court-Appointed Receiver over the assets of the following Defendants and Relief Defendants: Rust Rare Coin Inc. (“RRC”), Gaylen Dean Rust, R Legacy Racing Inc., R Legacy Entertainment LLC, R Legacy Investments LLC, Gaylen Dean Rust, Denise Gunderson Rust, Joshua Daniel Rust, and Aleesha Rust Franklin (collectively, “Receivership

Defendants”), hereby submits this eighteenth interim fee application (this “Fee Application”), seeking approval by the Court for the fees and expenses incurred by the Receiver; the Receiver’s counsel, Parr Brown Gee & Loveless (“Parr Brown”); the Conflict Receiver, Wayne Klein, and his counsel, Ogletree Deakins Nash Smoak & Stewart; and the Receiver’s accountants, Berkeley Research Group (“BRG”), for the period of January 1, 2023, through March 31, 2023 (the “Application Period”). The Receiver seeks authorization to pay all allowed fees and expenses from the Receivership Estate once the Receiver has recovered an amount equal to three times the fees requested in this Fee Application and allowed in prior applications. In support hereof, the Receiver states as follows:

**I. RELEVANT BACKGROUND**

1. On November 27, 2018, the Court entered an *Order Appointing Receiver and Staying Litigation* (the “Appointment Order”). *See* Dkt. No. 54. Accordingly, the Receiver has worked in concert with his counsel, Parr Brown, and his accountants, BRG, to identify, secure, and liquidate various Receivership assets, identify claimants and creditors of the Receivership Estate, and identify and initiate discussions with net winners to recover funds for the benefit of all Receivership claimants.

2. The Receiver has filed his *Eighteenth Quarterly Status Report*, which includes a status report for the period of January 1, 2023, through March 31, 2023 (the “Eighteenth Status Report”).<sup>1</sup> The Eighteenth Status Report provides a comprehensive description of the services performed by the Receiver and his professionals during the Application Period and is incorporated herein by reference.

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<sup>1</sup> Docket No. 506 filed April 28, 2023.

## **II. REQUEST FOR COURT APPROVAL OF FEES AND EXPENSES**

3. The Appointment Order provides, in the relevant part:

57. Subject to Paragraph 59 immediately below, the Receiver is authorized to solicit persons and entities (“Retained Personnel”) to assist him in carrying out the duties and responsibilities described in this Order. The Receiver shall not engage any Retained Personnel without first obtaining an Order of the Court authorizing such engagement.

58. The Receiver and Retained Personnel are entitled to reasonable compensation and expense reimbursement from the Receivership Estates. The Receiver and Retained Personnel shall not be compensated or reimbursed by, or otherwise entitled to, any funds from the Court, the CFTC, or the State of Utah. Such compensation shall require the prior review by Plaintiffs and approval of the Court.

4. Accordingly, the Receiver respectfully requests that the Court approve the fees and expenses incurred by the Receiver and his team, the Conflict Receiver and his counsel, and BRG, as set forth below and in the attached Exhibits.

## **III. FEES AND EXPENSES REQUESTED ARE ACTUAL, NECESSARY AND REASONABLE FOR THE SERVICES RENDERED**

5. During this Application Period, the Receiver and his professionals have provided actual and necessary services for the Receivership Estate as summarized below and detailed in the Exhibits attached hereto. The Exhibits also detail the out-of-pocket expenses incurred by the professionals in rendering services to the Receivership Estate.

6. Parr Brown, the Conflict Receiver and BRG have submitted their invoices to the Receiver, and the Receiver has reviewed and approved the invoices.

7. This Fee Application complies with the billing instructions set forth in the Appointment Order. The Receiver submitted this Fee Application to the Utah Division of Securities and CFTC prior to filing it with the Court, and both have informed the Receiver that they have no objection to the payment of the fees and reimbursement of the expenses outlined herein.

8. The Receiver believes that the fees and expenses are reasonable. The Receiver also believes that the services rendered and the expenses advanced have been beneficial to the Receivership Estate.

9. Consistent with the Receiver's previous fee applications, the Receiver and his professionals have continued to write off time and delay payment to assure that the Receivership Estate will receive an amount at least three times in excess of any fees requested *before* the Receiver and his professionals are paid. In this Fee Application, the Receiver has voluntarily written off all time related to the preparation of any fee application and has otherwise made voluntary downward adjustments to fees and expenses as appropriate.

#### **IV. SUMMARY OF AMOUNTS REQUESTED**

10. The total amounts requested for the Receiver, his professionals, the Conflict Receiver and his counsel, and BRG in this Fee Application, including the relevant voluntary write downs, are summarized below:

a. Receiver: From January 1, 2023, through March 31, 2023, the Receiver billed a total of 48.6 hours for services to the Receivership Estate. The Receiver is seeking approval for the payment of fees totaling \$21,627.00. *See* Exhibit A.

b. Parr Brown: From January 1, 2023, through March 31, 2023, Parr Brown billed a total of 967.5 hours for legal services to the Receivership Estate. Parr Brown is seeking approval for the payment of fees and expenses totaling \$319,817.65 of which \$306,661.50 is for fees and \$13,156.15 is for out-of-pocket expenses. *See* Exhibit B. These amounts include a voluntary write down of \$9,090.50.

c. BRG: From January 1, 2023, through March 31, 2023, BRG billed a total of 380 hours providing forensic, tax, and general accounting services to the Receivership

Estate. BRG is seeking approval for the payment of fees and expenses totaling \$132,461.88 of which \$132,410.50 is for fees and \$51.38 for out-of-pocket expenses. *See* Exhibit C. These amounts include a voluntary write down of \$2,236.50.

d. Conflict Receiver and counsel: From January 1, 2023, through March 31, 2023, Conflict Receiver, Wayne Klein, and his legal counsel billed a total of 12.6 hours for services to the Receivership Estate. The Conflict Receiver is seeking approval for the payment of fees totaling \$3,850.00.

11. The amounts requested reflect a total of \$11,327.00 in voluntary reductions by the respective professionals in an exercise of their billing judgment.

12. The Receivership Estate has sufficient funds to pay all amounts requested. However, as set forth above, the Receiver and his professionals will not take any fees or be reimbursed for any expenses from the Receivership Estate until *after* the Receiver recovers at least three times the total amount of the fees requested in this and all previous fee applications.

## V. SUMMARY OF EXHIBITS

13. Professional services have been recorded contemporaneously with services being rendered and these services, as well as the expenses incurred, are detailed in the attached Exhibits described below.

14. The Receiver, Parr Brown and BRG have maintained their time in records organized according to tasks, with each task record being maintained in chronological order.

15. The following Exhibits are attached hereto in support of this Fee Application:

### Exhibit A—Time Records of Receiver

#### **Exhibit A Summary by Task**

16. This section of Exhibit A breaks down the total fees assessed for each of the

Receiver's tasks, which are discussed in more detail below.

**Exhibit A-1 Administration of Receivership Estate**

17. The Receiver continued to communicate with the Utah Attorney General's Office to ensure they remain updated about the status of the Receivership Estate and the ongoing claims analysis process and recovery efforts. In addition, the Receiver reviewed certain tax and financial documents related to the administration of the Receivership Estate and assisted in the preparation and filing of the Estate's tax returns.

**Exhibit A-2 Asset Analysis and Recovery**

18. The Receiver worked closely with his legal counsel during the Application Period in negotiating favorable settlement agreements with net winners. These settlement efforts involved extensive coordination with the Receiver's counsel and required the Receiver to review the supporting documentation and settlement agreements before their execution. The Receiver continued coordinating with investors and their counsel to substantiate various metal transactions that were associated with such investors.

**Exhibit A-5 Claims Administration**

19. Having published the Claims Registry, which identifies all 627 claims submitted to date, the Receiver worked closely with his team to review and analyze responses received from Claimants.

**Exhibit B-Time Records of Parr Brown**

**Exhibit B Summary by Task**

20. This section of Exhibit B breaks down the total fees assessed for each of Parr Brown's tasks, which are discussed in more detail below.

**Exhibit B-1 Administration of Receivership Estate**

21. During this Application Period, Parr Brown continued to manage and keep secure the property within the Receivership Estate. Parr Brown continued posting motions and Court orders on the Receiver's website and also providing updates to the Receiver's mailing matrix to ensure all interested parties received information about the Receivership's progress.

**Exhibit B-2 Asset Analysis & Recovery**

22. During the Application Period, Parr Brown continued to work the numerous claw back actions filed against approximately 124 investors (the "Claw Back Defendants"). Parr Brown also continued working with the 170 potential net winners (the "Net Winners") with whom they executed tolling agreements in order to facilitate further discussions and negotiations regarding their transactions with the Receivership Defendants. As a result of the Court granting the Receiver's Motion for Settlement Authority (*See* Dkt. No. 271), Parr Brown has worked closely with the Receiver to finalize agreements and negotiate with investors and creditors to increase the number of settlement agreements.

**Exhibit B-3 Disposition of Assets**

23. Parr Brown continues to work on the sale of certain intellectual property assets. The Receivership Estate owns the rights to hundreds of low-value songs and albums. Parr Brown has received offers to purchase such songs or albums ranging from a few hundred dollars to a few thousand dollars. In order to efficiently liquidate these, Parr Brown filed a motion with the Court seeking permission to sell music rights, without having to incur the expense of filing a motion and obtaining Court approval, if the sale is for less than \$7,500. This will allow the Receiver to sell lower value music rights "as is" while minimizing administrative expenses to the Receivership Estate.

**Exhibit B-5 Claims Administration**

24. During this Application Period, Parr Brown served the Claims Registry packet, which identifies all 627 claims and includes the Claimants' self-reported amount claimed, the allowed amount of the claim as determined by the Receiver, and—if applicable—an explanation of the Receiver's determination and objection to all or part of the claim. Claimants had until May 17, 2023, to file a response to the Receiver's determination and treatment of their claim. Parr Brown, in coordination with the Receiver, is thoroughly reviewing each Claimant's response and will take one of the following actions: (i) accept the response as adequately addressing the Receiver's concerns and accept the claim amount as originally filed, (ii) contact the Claimant to resolve any remaining disagreement informally and, (iii) if the claim cannot be resolved informally, schedule a hearing on the claim objection and request that the Court resolve the claim dispute.

25. During the Application Period, Parr Brown assisted with processing the claims in the Zion Bank class action lawsuit. Parr Brown is tracking its fees for those services separately, as it anticipates seeking reimbursement for the Receivership Estate of those fees from the Zions class settlement.

**Exhibit C-Time Records of BRG**

26. This section breaks down the total fees assessed by BRG, which are discussed in more detail below.

**Claims Process/Distribution**

27. BRG worked extensively with the Receiver's team to review the investor claims filed and recorded in this matter. BRG assisted the Receiver's team to review, analyze and reconcile over 500 investor claims that were included in the claims register prepared by the



Receiver. BRG also provided assistance in the determination and calculation of the percent recovery for investor claims, as well as the allowed amount of investor claims.

### **Net Winner/Claims Analysis & Recovery Litigation**

28. BRG continued to analyze and review information, support, and transaction data contained in Rust Rare Coin's records, as well as investor claims for various investors in connection with the Receiver's claims review process. BRG has also assisted the Receiver and his team to verify the accuracy, identify any issues, and reconcile the amount being claimed by each investor, based upon the books and records of Rust Rare Coin.

29. BRG continued to assist the Receiver in responding to investors and their counsel and in providing requested documents and support for the Receiver's analyses, including replying to discovery requests and subpoenas for documents received from opposing counsel.

30. BRG also continued to perform analysis of cash receipt and disbursement activity, transaction support, investor files, email communications, investor questionnaire responses, claim filings, and document requests, in order to identify and determine the amount of funds invested and draws taken by each individual investor and group. BRG's analysis has been critical in assisting the Receiver to identify and verify potential claw backs to pursue, as well as potential claims by investors. BRG has also developed and provided additional analyses to the Receiver for investors to be used in discussions, negotiations, and potential recoveries.

31. Additionally, BRG continues to assist the Receiver in communications with investors and their counsel, including participating in mediations, meetings, and calls, to obtain additional information and support regarding investment activity and to reach settlement agreements. BRG has worked with the Receiver and his counsel to analyze and review proposed settlement offers and financial information from investors to determine the appropriateness and

accuracy of such offers, as well as claims concerning the ability to pay the amounts sought by the Receiver.

### **Tax Compliance / Analysis / Preparation**

32. BRG analyzed 2022 cash transactions to identify information returns required to be prepared and filed. BRG prepared the 2022 Form(s) 1099. The completed returns were reviewed to ensure completeness and accuracy. Corrections and updates were made as was necessary.

### **Deposition Preparation**

33. BRG experts were required to prepare for and offer deposition testimony in a related lawsuit outside of, but related to, the Rust Rare Coin receivership. BRG reviewed its expert declaration containing its analysis, opinions, and conclusions regarding the alleged Rust Ponzi scheme activities, including extensive exhibits and appendices in connection with this request. BRG also reviewed and compiled case files, documents, and support related to investor activity relevant to the investor involved in this lawsuit.

### **Exhibit D—Time Records of Conflict Receiver and His Counsel**

34. During this Application Period, the Conflict Receiver and his counsel continued their correspondence and review of documentation related to various claw back defendants. The Conflict Receiver continued to work towards a resolution of these recovery matters and to correspond with investors and their legal counsel regarding the same.

## **VI. PRIOR REQUESTS AND INTERIM NATURE OF REQUEST**

35. The Receiver has previously filed seventeen interim fee applications,<sup>2</sup> all of which

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<sup>2</sup> The Receiver's First Interim Fee Application was filed on February 22, 2019. *See* Dkt. No. 120. The Receiver's Second Interim Fee Application was filed on May 24, 2019. *See* Dkt. No. 187. The Receiver's Third Interim Fee Application was filed on September 4, 2019. *See* Dkt. No. 241. The Receiver's Fourth Interim Fee Application was filed on December 31, 2019. *See* Dkt. No. 274. The Receiver's Fifth Interim Fee Application was filed on March 10, 2020. *See* Dkt. No. 292. The Receiver's Sixth Interim Fee Application was filed on August 7, 2020. *See* Dkt. No. 333. The Receiver's Seventh Interim Fee Application was filed on November 13, 2020. *See* Dkt. No. 367. The Receiver's

were approved by the Court. *See* Dkt. Nos. 153, 203, 247, 275, 293, 339, 367, 382, 413, 416, 428, 434, 442, 461, 481, 488 and 494. This is the Eighteenth Interim Fee Application of the Receiver and his professionals. The Receiver and his professionals understand that the authorization and payment of fees and expenses is interim in nature. All fees and expenses allowed on an interim basis will be subject to final review at the close of the case and the discharge of the Receiver when the Receiver files a final accounting and the Receiver and his professional's file final fee applications.

41. For the reasons set forth above, and as supported by the Exhibits attached hereto, the Receiver respectfully submits that the fees and expenses requested herein are for actual services that were necessary for and beneficial to the administration of the Receivership Estate. The Receiver has made every attempt to limit the administrative expenses of this Receivership Estate, and the Receiver submits that given the work that has been performed as reflected in the attached time entries, the fees and expenses that have been incurred are reasonable.

42. Pursuant to Paragraph 62 of the Appointment Order, *see* Dkt. No. 54, the Receiver represents and avers that this Fee Application complies with the terms of the billing instructions agreed to by the Receiver, the fees and expenses included therein were incurred in the best interests of the Receivership Estate, and 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.

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Eighth Interim Fee Application was filed on January 15, 2021. *See* Dkt. No. 382. The Receiver's Ninth Interim Fee Application was filed on May 27, 2021. *See* Dkt. No. 413. The Receiver's Tenth Interim Fee Application was filed on July 6, 2021. *See* Dkt. No. 416. The Receiver's Eleventh Interim Fee Application was filed on October 5, 2021. *See* Dkt. No. 428. The Receiver's Twelfth Interim Fee Application was filed on December 13, 2021. *See* Dkt. No. 434. The Receiver's Thirteenth Interim Fee Application was filed on February 22, 2022. *See* Dkt. No. 442. The Receiver's Fourteenth Interim Fee Application was filed on June 14, 2022. *See* Dkt. No. 461. The Receiver's Fifteenth Interim Fee Application was filed on September 12, 2022. *See* Dkt. No. 481. The Receiver's Sixteenth Interim Fee Application was filed on December 14, 2022. *See* Dkt. No. 488. The Receiver's Seventeenth Interim Fee Application was filed on March 14, 2023. *See* Dkt. No. 494.

43. The Receiver respectfully requests that the Court enter an Order (i) approving, on an interim basis, the Receiver's fees in the amount of \$21,627.00; Parr Brown's fees in the amount of \$306,661.50 and out-of-pocket expenses of \$13,156.15; BRG's fees in the amount of \$132,410.50 and out-of-pocket expenses of \$51.38; the Conflict Receiver and his counsel's fees in the amount of \$3,850; and (ii) authorizing the Receiver to pay these fees and reimburse the expenses from the Receivership Estate once the Receiver has recovered for the Estate at least three times the amount of fees requested in this Fee Application and prior applications.

44. A proposed Order is attached hereto as **Exhibit E**.

The Receiver, Parr Brown, BRG and the Conflict Receiver verify under penalty of perjury that the foregoing is true and correct.

DATED this 12th day of June 2023.

**RECEIVER**

By: /s/ Jonathan O. Hafen  
Jonathan O. Hafen, Receiver

**PARR BROWN GEE & LOVELESS, P.C.**

By: /s/ Joseph M.R. Covey  
Joseph M.R. Covey  
Jeffrey A. Balls  
Walter O. Peterson  
*Attorneys for Receiver Jonathan O. Hafen*

**BERKELEY RESEARCH GROUP**

By: /s/ \*Ray Strong  
Ray Strong  
*\*Electronically signed with permission*

**CONFLICT RECEIVER**

/s/ \*Wayne Klein  
Wayne Klein, Conflict Receiver  
*\*Electronically signed with permission*

**OGLETREE DEAKINS NASH SMOAK &  
STEWART, P.C.**

By: /s/ \*David C. Castleberry  
David. C. Castleberry  
*Attorney for Conflict Receiver Wayne Klein*  
*\*Electronically signed with permission*

**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that service of the above **EIGHTEENTH INTERIM FEE APPLICATION** was (1) electronically filed with the Clerk of the Court through the CM/ECF system on June 12, 2023, which sent notice of the electronic filing to all counsel of record, (2) posted on the Receiver's website (rustrarecoinreceiver.com), and (3) emailed to all those on the Receiver's master mailing matrix.

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/s/ Lori Stumpf

**EXHIBIT A**

**EXHIBIT A**  
**FIFTEENTH FEE APPLICATION**  
**Receiver's Fees**

**EXHIBIT A**



**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receiver

May 26, 2023

Invoice: 925968  
Client: 177110  
Matter: 1

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**INVOICE SUMMARY**

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Administration**

Professional Services	\$ 845.50
Total Costs Advanced	<u>\$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 845.50</b>

**PARR BROWN GEE & LOVELESS**

Invoice: 925968  
 Rust Rare Coin Receiver  
 Administration

May 26, 2023  
 Client: 177110  
 Matter: 1

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
1/31/23	JOH	Attend to tax refund matter; Correspond by email with Joe Covey re same; Prepare for call with accountants and others; Follow up with legal counsel re staffing matters	.50	222.50
2/16/23	JOH	Attend to investor communication matter	.10	44.50
3/06/23	JOH	Attend to three clawback actions; Meet with legal counsel re various matters; Attend to communications re claims	1.30	578.50

**TOTAL PROFESSIONAL SERVICES** **\$ 845.50**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Rate</b>	<b>Hours</b>	<b>Total</b>
Jonathan O Hafen	445.00	1.90	845.50
<b>TOTALS</b>		<b>1.90</b>	<b>\$ 845.50</b>

**TOTAL THIS INVOICE** **\$ 845.50**

**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receiver

May 26, 2023

Invoice: 925968  
Client: 177110  
Matter: 1

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**REMITTANCE ADVICE**

RE: Administration

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**BALANCE DUE THIS INVOICE \$ 845.50**

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Please return this advice with payment to:

Parr Brown Gee & Loveless  
P.O. Box 11019  
Salt Lake City, UT 84147

**Wire Transfer Instructions**

JP Morgan Chase Bank  
201 South Main St Ste 300  
Salt Lake City, UT 84111-2870  
Swift Code #: CHASUS33  
ABA #: 021000021  
Parr Brown Gee & Loveless  
Account #: 912454114

**E-Check**

Name of Bank: \_\_\_\_\_  
Routing #: \_\_\_\_\_  
Account #: \_\_\_\_\_  
Name on Account: \_\_\_\_\_  
Account Holder Address: \_\_\_\_\_  
Amount: \$ \_\_\_\_\_

**EFT/ACH Pay Instructions**

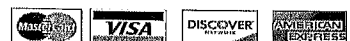
Routing #: 124001545  
Account #: 912454114

**\*3% fee for credit card transactions**

**Please reference your invoice # 925968**

**Online Payments:** <https://parrbrown.com/payment-portal>  
**Payments accepted by phone (801) 532-7840**  
Payable Upon Receipt

A finance charge of twelve percent (12%) per annum will accrue on any account not paid within thirty (30) days after the date of this invoice



**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receiver

May 26, 2023

Invoice: 925969  
Client: 177110  
Matter: 2

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**INVOICE SUMMARY**

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Assett Analysis & Recovery**

Professional Services	\$ 13,483.50
Total Costs Advanced	<u>    \$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 13,483.50</b>

## PARR BROWN GEE &amp; LOVELESS

Invoice: 925969  
 Rust Rare Coin Receiver  
 Asset Analysis & Recovery

May 26, 2023  
 Client: 177110  
 Matter: 2

**PROFESSIONAL SERVICES RENDERED**

Date	Tkpr	Description	Hours	Amount
1/03/23	JOH	Attend to clawback action; Review email correspondence re settlement	.80	356.00
1/04/23	JOH	Attend to two clawback actions; Call with legal counsel re various matters	.80	356.00
1/05/23	JOH	Attend to clawback action	.20	89.00
1/06/23	JOH	Attend to six clawback actions; Attend to potential sale of music asset; Follow up with legal counsel re same; Attend to communication from potential asset purchaser	1.90	845.50
1/10/23	JOH	Attend to clawback action	.40	178.00
1/17/23	JOH	Attend to clawback action	.30	133.50
1/18/23	JOH	Review email correspondence from legal counsel re claims process; Attend to clawback action	.40	178.00
1/19/23	JOH	Attend to clawback action; Correspond by email with legal counsel re issue re potential depositions of Gaylen Rust; Follow up re same	.40	178.00
1/20/23	JOH	Attend to clawback action	.10	44.50
1/24/23	JOH	Attend to clawback action	.30	133.50
1/25/23	JOH	Attend to multiple clawback actions; Correspond by email with legal counsel re claims process	.30	133.50
1/27/23	JOH	Attend to two clawback actions; Review email correspondence re tax refund matter	.70	311.50
1/30/23	JOH	Attend to clawback actions; Correspond by email with legal counsel re potential sale of music asset; Follow up re same; Review quarterly report; Correspond by email with legal counsel re same.	.80	356.00
2/01/23	JOH	Attend to three claw back actions; Call and review email correspondence re tax matter; Follow up with legal counsel re same; Prepare for meeting re claims registry; Correspond by email with legal counsel re various matters	2.40	1,068.00
2/03/23	JOH	Review email correspondence from legal counsel; Attend to claims logistics and related matters; Analyze clawback action and proposed settlement; Review documents; Review proposed dismissal document and related email correspondence	1.30	578.50
2/06/23	JOH	Attend to clawback action; Attend to potential sale of music asset; Review pleading and related email correspondence re dismissal of action	.90	400.50
2/07/23	JOH	Follow up with legal counsel re two clawback actions; Review document re potential sale of asset	1.20	534.00
2/13/23	JOH	Call with opposing counsel in re issue with claim; Attend to two clawback actions; Meet with legal counsel re various matters; Review documents	2.10	934.50
2/14/23	JOH	Attend to clawback action	.30	133.50
2/21/23	JOH	Attend to three clawback actions; Analyze proposed resolution of claim; Correspond by email with conflicts receiver re same; Review documents	1.70	756.50
2/23/23	JOH	Attend to clawback action; Call with legal counsel re various matters; Review documents	1.00	445.00
2/27/23	JOH	Attend to clawback action; Follow up re evidence relating to victim claim	.60	267.00

PARR BROWN GEE & LOVELESS

Invoice: 925969  
 Rust Rare Coin Receiver  
 Asset Analysis & Recovery

May 26, 2023  
 Client: 177110  
 Matter: 2

Date	Tkpr	Description	Hours	Amount
3/01/23	JOH	Attend to two clawback claims	1.00	445.00
3/08/23	JOH	Correspond by email with opposing counsel re claims issue; Correspond by email with legal counsel re same	.20	89.00
3/10/23	JOH	Correspond by email with legal counsel re clawback action; Follow up re same	.30	133.50
3/13/23	JOH	Review various documents; Meetings with legal counsel re clawback actions and related matters; Follow up re same; Attend to claims status	1.90	845.50
3/16/23	JOH	Attend to two clawback actions; Call with legal counsel re various matters; Analyze potential application of class action funds; Correspond by email with legal counsel re same	1.80	801.00
3/17/23	JOH	Attend to clawback action; Correspond by email with legal counsel re various matters; Review email correspondence from counsel to CFTC; reviewing expert disclosures in clawback action	1.50	667.50
3/21/23	JOH	Prepare for and participate in meeting with legal counsel re clawback actions and related matters; Attend to distribution methodology issue	1.60	712.00
3/28/23	JOH	Attend to clawback action	.30	133.50
3/30/23	JOH	Attend to three clawback actions; Meet with legal counsel re various matters; Correspond by email with legal counsel re discovery response; Review discovery responses; Correspond by email with legal counsel re upcoming claims meeting; Prepare for same	2.20	979.00
3/31/23	JOH	Attend to clawback action; Correspond by email with legal counsel re asset sale	.60	267.00

**TOTAL PROFESSIONAL SERVICES \$ 13,483.50**

**SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Jonathan O Hafen	445.00	30.30	13,483.50
<b>TOTALS</b>		<b>30.30</b>	<b>\$ 13,483.50</b>

**TOTAL THIS INVOICE \$ 13,483.50**

**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receiver

May 26, 2023

Invoice: 925969  
Client: 177110  
Matter: 2

---

**REMITTANCE ADVICE**

**RE: Assett Analysis & Recovery**

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**BALANCE DUE THIS INVOICE \$ 13,483.50**

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Please return this advice with payment to:

Parr Brown Gee & Loveless  
P.O. Box 11019  
Salt Lake City, UT 84147

**Wire Transfer Instructions**

JP Morgan Chase Bank  
201 South Main St Ste 300  
Salt Lake City, UT 84111-2870  
Swift Code #: CHASUS33  
ABA #: 021000021  
Parr Brown Gee & Loveless  
Account #: 912454114

**E-Check**

Name of Bank: \_\_\_\_\_  
Routing #: \_\_\_\_\_  
Account #: \_\_\_\_\_  
Name on Account: \_\_\_\_\_  
Account Holder Address: \_\_\_\_\_  
Amount: \$ \_\_\_\_\_

**EFT/ACH Pay Instructions**

Routing #: 124001545  
Account #: 912454114

**\*3% fee for credit card transactions**

**Please reference your invoice # 925969**

**Online Payments:** <https://parrbrown.com/payment-portal>  
**Payments accepted by phone (801) 532-7840**  
Payable Upon Receipt

A finance charge of twelve percent (12%) per annum will accrue on any account not paid within thirty (30) days after the date of this invoice



**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receiver

May 26, 2023

Invoice: 925970  
Client: 177110  
Matter: 3

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**INVOICE SUMMARY**

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Disposition of Assets**

Professional Services	\$ 1,602.00
Total Costs Advanced	<u>    \$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 1,602.00</b>



**PARR BROWN GEE & LOVELESS**

Invoice: 925970  
 Rust Rare Coin Receiver  
 Disposition of Assets

May 26, 2023  
 Client: 177110  
 Matter: 3

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
1/11/23	JOH	Attend to potential sale of music asset; Attend to clawback action	.50	222.50
1/12/23	JOH	Follow up with legal counsel re potential sale of music asset	.10	44.50
1/23/23	JOH	Attend to potential sale of asset; Review documents; Attend to three clawback actions; Call with legal counsel re various matters; Review proposed settlement agreement; Call with and correspond by email with potential purchaser of music asset	2.10	934.50
2/08/23	JOH	Attend to clawback action; Attend to asset sale; Review documents relating to foregoing	.90	400.50
<b>TOTAL PROFESSIONAL SERVICES</b>				<b>\$ 1,602.00</b>

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Rate</b>	<b>Hours</b>	<b>Total</b>
Jonathan O Hafen	445.00	3.60	1,602.00
<b>TOTALS</b>		<b>3.60</b>	<b>\$ 1,602.00</b>

**TOTAL THIS INVOICE \$ 1,602.00**

**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receiver

May 26, 2023

Invoice: 925970  
Client: 177110  
Matter: 3

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**REMITTANCE ADVICE**

**RE: Disposition of Assets**

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**BALANCE DUE THIS INVOICE \$ 1,602.00**

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Please return this advice with payment to:

Parr Brown Gee & Loveless  
P.O. Box 11019  
Salt Lake City, UT 84147

**Wire Transfer Instructions**

JP Morgan Chase Bank  
201 South Main St Ste 300  
Salt Lake City, UT 84111-2870  
Swift Code #: CHASUS33  
ABA #: 021000021  
Parr Brown Gee & Loveless  
Account #: 912454114

**E-Check**

Name of Bank: \_\_\_\_\_  
Routing #: \_\_\_\_\_  
Account #: \_\_\_\_\_  
Name on Account: \_\_\_\_\_  
Account Holder Address: \_\_\_\_\_  
Amount: \$ \_\_\_\_\_

**EFT/ACH Pay Instructions**

Routing #: 124001545  
Account #: 912454114

**\*3% fee for credit card transactions**

**Please reference your invoice # 925970**

**Online Payments:** <https://parrbrown.com/payment-portal>  
**Payments accepted by phone (801) 532-7840**  
Payable Upon Receipt

A finance charge of twelve percent (12%) per annum will accrue on any account not paid within thirty (30) days after the date of this invoice



**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receiver

May 26, 2023

Invoice: 925971  
Client: 177110  
Matter: 5

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**INVOICE SUMMARY**

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Claims Administration**

Professional Services	\$ 5,696.00
Total Costs Advanced	<u>    \$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 5,696.00</b>

PARR BROWN GEE & LOVELESS

Invoice: 925971  
 Rust Rare Coin Receiver  
 Claims Administration

May 26, 2023  
 Client: 177110  
 Matter: 5

**PROFESSIONAL SERVICES RENDERED**

Date	Tkpr	Description	Hours	Amount
2/02/23	JOH	Prepare for and participate in meeting with legal counsel re claims registry and related matters; Review documents; Analyze clawback actions; Attend to tax issues	4.10	1,824.50
2/09/23	JOH	Prepare for and attend meeting with lawyers and experts re distribution methodology and related matters; Follow up re clawback action; Call with opposing counsel re clawback action; Attend to tax matter	2.00	890.00
2/10/23	JOH	Prepare for and participate in meeting with legal counsel re claims and claims registry and related matters; Follow up re clawback action	1.70	756.50
3/03/23	JOH	Attend to inquiries by claim purchasers; Follow up re same; Attend to communications from claimants	.80	356.00
3/07/23	JOH	Correspond by email with legal counsel re claims matter	.10	44.50
3/20/23	JOH	Attend to two clawback actions; Prepare for and attend meeting with distribution methodology; Follow up re same; Correspond by email with legal counsel re same	1.70	756.50
3/22/23	JOH	Further analysis of distribution methodology issue; Correspond by email with legal counsel re same; Attend to clawback action; Review pleading and related email correspondence; Analyze potential changes to claims registry	1.40	623.00
3/23/23	JOH	Further attention to modifications to language on claims registry; Review email correspondence with legal counsel re same; Attend to two clawback actions	1.00	445.00

**TOTAL PROFESSIONAL SERVICES \$ 5,696.00**

**SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Jonathan O Hafen	445.00	12.80	5,696.00
<b>TOTALS</b>		<b>12.80</b>	<b>\$ 5,696.00</b>

**TOTAL THIS INVOICE \$ 5,696.00**

**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receiver

May 26, 2023

Invoice: 925971  
Client: 177110  
Matter: 5

---

**REMITTANCE ADVICE**

**RE: Claims Administration**

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**BALANCE DUE THIS INVOICE \$ 5,696.00**

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Please return this advice with payment to:

Parr Brown Gee & Loveless  
P.O. Box 11019  
Salt Lake City, UT 84147

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**E-Check**

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Account #: \_\_\_\_\_  
Name on Account: \_\_\_\_\_  
Account Holder Address: \_\_\_\_\_  
Amount: \$ \_\_\_\_\_

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**\*3% fee for credit card transactions**

**Please reference your invoice # 925971**

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Payable Upon Receipt

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**EXHIBIT B**

**EXHIBIT B**  
**FIFTEENTH FEE APPLICATION**  
**Parr Brown's Fees & Expenses**

**EXHIBIT B**

**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receivership

May 26, 2023

Invoice: 925963  
Client: 176430  
Matter: 1

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**INVOICE SUMMARY**

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Administration of Receivership Estate**

Professional Services	\$ 15,844.50
Total Costs Advanced	<u>\$ 57.87</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 15,902.37</b>

## PARR BROWN GEE &amp; LOVELESS

Invoice: 925963  
 Rust Rare Coin Receivership  
 Administration of Receivership Estate

May 26, 2023  
 Client: 176430  
 Matter: 1

**PROFESSIONAL SERVICES RENDERED**

Date	Tkpr	Description	Hours	Amount
1/03/23	SB	Review and redact general initial disclosures to prepare them for production to the pro se defendants; Review and respond to emails; Review and update the tracking matrix; Review filing procedures and emails from Jessica Houf	5.90	1,209.50
1/04/23	SB	Review and redact general initial disclosures; Review and respond to emails from claimants; Review summaries and Excel tracking forms; Review emails re Quarterly Reports	4.80	984.00
1/05/23	JMC	Correspond with Walter Peterson and Caralee Marsh re transition work by Jesse Houf	.60	255.00
1/05/23	SB	Review and redact general initial disclosures; Review and respond to emails	5.80	1,189.00
1/06/23	JMC	Review bank account information	.20	85.00
1/06/23	SB	Review and redact general initial disclosures to prepare them for production to the pro se defendants; Review emails re music right purchases; Review Outlook email box and website email; Review and log deposit items for today	2.70	553.50
1/09/23	WOP	Review attorney time sheets for quarterly report; Correspond with various attorneys re same; Review docket	3.20	896.00
1/12/23	JMC	Review expenses related to disposed real property	.10	42.50
1/13/23	WOP	Begin draft of quarterly report	1.80	504.00
1/17/23	WOP	Continue draft of quarterly report; Correspond with Jess and Kathy re same	2.10	588.00
1/18/23	WOP	No Charge - Review and redact time sheets for fee application; Call with Claire	3.30	N/C
1/18/23	WOP	Continue draft of quarterly report; Review ledger; Correspond with Susie re same; Create exhibits	1.80	504.00
1/18/23	CMM	Review emails re Gregory settlement issues including need for a point person for investor questions	.50	130.00
1/19/23	WOP	Call with Joe re quarterly report; Revise draft of same	.80	224.00
1/20/23	WOP	Continue quarterly report; Correspond with Claire re same	.80	224.00
1/22/23	WOP	Review docket and pleadings in Zions class action; Revise quarterly report	2.20	616.00
1/23/23	JMC	Correspond with Walter Peterson re quarterly report	.10	42.50
1/23/23	WOP	Finish draft of quarterly report; Correspond with Jeff re same; Create exhibits	4.70	1,316.00
1/24/23	JMC	Work on quarterly report	.60	255.00
1/24/23	WOP	No Charge - Correspondence with conflict receiver, BRG and Arizona counsel re fee application	.60	N/C
1/24/23	WOP	Review time sheets; Redact the same; Meet with Jeff re disclosure of settlement agreements	3.30	924.00



## PARR BROWN GEE &amp; LOVELESS

Invoice: 925963  
 Rust Rare Coin Receivership  
 Administration of Receivership Estate

May 26, 2023  
 Client: 176430  
 Matter: 1

Date	Tkpr	Description	Hours	Amount
1/27/23	JMC	Review and revise Rust Seventeenth Quarterly Report; Correspond with Jon Hafen re the same	.60	255.00
1/30/23	WOP	Review comments to quarterly report	.40	112.00
1/31/23	JMC	Review filed Seventeenth Quarterly Report	.20	85.00
1/31/23	SB	Research claims and their treatment for claims registry	2.80	574.00
2/01/23	SB	Handle invoice for database services	.10	20.50
2/02/23	JMC	Review IRS forms and coordinate delivery to BRG	.10	42.50
2/03/23	JMC	Review payment receipts from the case	.20	85.00
2/03/23	WOP	No Charge - Correspond with Caralee and team re setting up new matter for the payment of fees for the Gregory case; Correspond with BRG re fee application; Correspond with conflict receiver re same; Correspond with Arizona counsel re same; Review prior fee application	3.30	N/C
2/03/23	CMM	Communicate with Susie Bailey re process for taking questions and new claims once claims registry is published	.80	208.00
2/06/23	JMC	Review income receipts from case	.20	85.00
2/06/23	WOP	No Charge - Review docket; Correspond with BRG re fee application; Review and redact BRG invoices	2.70	N/C
2/08/23	SB	Review the Percell calendar and email Chaunceton Bird re same	.10	20.50
2/16/23	JMC	No Charge - Correspond with Walter Peterson re fee application	.20	N/C
2/16/23	WOP	No Charge - Continue draft of fee application; Correspond with Joe re same; Correspond with Claire re same	2.10	N/C
2/17/23	JMC	No Charge - Correspond with Claire McGuire re fee application; Correspond with Walter Peterson re the same	.20	N/C
2/17/23	WOP	No Charge - Continue draft of fee application	1.70	N/C
2/18/23	WOP	No Charge - Review revised attorney time sheets; Redact the same; Continue draft of fee application; Create all exhibits; Create backup calculation for fees; Correspond with Caralee; Correspond with Joe	4.60	N/C
2/21/23	WOP	No Charge - Revise fee application; Correspond with Joe; Correspond with Caralee re same	1.80	N/C
2/28/23	WOP	No Charge - Revise fee application	1.30	N/C
2/28/23	CMM	Call with Jeff Shaw and follow up to the same re analysis needed for Larsen documents; Meeting with Joseph Covey and Michael Hoppe re settlement with investor and various mechanism to get money from asset; Meeting with the same re summary judgement filing in Darren Nelson matter and extension of fact discovery in Larsen matter; Review verified financial statement sent in by investor re assets available to settle claim	3.80	988.00
3/01/23	JMC	No Charge - Review and finalize 17th fee application; Correspond with Jon Hafen re the same	1.10	N/C
3/01/23	CMM	Call with Jeffery Balls and Susie Bailey re process for taking questions re claims determination	.50	130.00

**PARR BROWN GEE & LOVELESS**

Invoice: 925963  
 Rust Rare Coin Receivership  
 Administration of Receivership Estate

May 26, 2023  
 Client: 176430  
 Matter: 1

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
3/02/23	CMM	Draft and respond to investor re settlement offer; Revise the same per feedback from Michael Hoppe; Communicate with Michael Hoppe re discount to investor in settlement negotiations; Review beneficiary defendants second set of discovery requests and communications re the same with Michael Hoppe and Joe Covey	3.70	962.00
3/03/23	JMC	No Charge - Correspond with Jon Hafen and representatives for the government re the seventeenth fee application	.50	N/C
3/06/23	JMC	No Charge - Correspond with Jennifer Korb and Walter Peterson re fee application	.30	N/C
3/06/23	WOP	No Charge - Correspond with BRG re fee application	.20	N/C
3/07/23	JMC	No Charge - Correspond with Jennifer Korb and Claire McGuire re changes to fee application	1.00	N/C
3/07/23	WOP	No Charge - Correspond with Claire Joe re time entries in fee application	.40	N/C
3/09/23	JMC	No Charge - Review fee application	.10	N/C
3/14/23	JMC	Correspond with Kathy Bates re Rust deposits and related issues	.40	170.00
3/14/23	JMC	No Charge - Correspond with the CFTC re the fee application; Coordinate the filing, posting and service of the fee application	1.20	N/C
3/14/23	WOP	No Charge - Correspond with Claire and BRG re fee application	.40	N/C
3/17/23	JMC	Correspond with CFTC re restitution payments and claims; Review settlement payment information	.50	212.50
3/20/23	JMC	Correspond with Lori Stumpf re settlement payments received and related issues; Correspond with Jeff Balls and Jen Luft re various administrative issues in the case	1.30	552.50
3/21/23	JMC	No Charge - Review and analyze numbers for fee application	1.10	N/C
3/23/23	JMC	Correspond with Jeff Balls and counsel for Zions re deposition and related issues; Correspond with Jeff Balls re the same	1.10	467.50
3/24/23	JMC	Correspond with Jeff Balls and Ray Strong re expert testimony issues	.20	85.00
3/27/23	JMC	No Charge - Review and finalize payment on seventeenth fee application; Correspond with Kathy Bates re the payment	.70	N/C
3/27/23	WOP	No Charge - Correspond with Kathy and Spencer re fee application	.20	N/C
3/29/23	JMC	No Charge - Correspond with Kathy Bates re fee application	.10	N/C
3/31/23	JMC	Correspond with Susie Bailey re transition issues	.10	42.50
3/31/23	SB	Handle the RRC invoices; Review and update the RRC folders and merge my files to the share drive; Email to Lori Stumpf re same	1.00	205.00

**TOTAL PROFESSIONAL SERVICES**

**\$ 15,844.50**

**PARR BROWN GEE & LOVELESS**

Invoice: 925963  
 Rust Rare Coin Receivership  
 Administration of Receivership Estate

May 26, 2023  
 Client: 176430  
 Matter: 1

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Rate</b>	<b>Hours</b>	<b>Total</b>
Joseph M R Covey	425.00	6.50	2,762.50
Walter O Peterson	280.00	21.10	5,908.00
Claire M McGuire	260.00	9.30	2,418.00
Susan Bailey - Paralegal	205.00	23.20	4,756.00
<b>TOTALS</b>		<b>60.10</b>	<b>\$ 15,844.50</b>

**COSTS ADVANCED**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
1/21/23	Grasshopper	19.29
2/21/23	Grasshopper.com	19.29
3/21/23	Grasshopper.com	19.29

**TOTAL COSTS ADVANCED \$ 57.87**

**TOTAL THIS INVOICE \$ 15,902.37**

**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receivership

May 26, 2023

Invoice: 925963  
Client: 176430  
Matter: 1

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**REMITTANCE ADVICE**

**RE: Administration of Receivership Estate**

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**BALANCE DUE THIS INVOICE** **\$ 15,902.37**

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Please return this advice with payment to:

Parr Brown Gee & Loveless  
P.O. Box 11019  
Salt Lake City, UT 84147

**Wire Transfer Instructions**

JP Morgan Chase Bank  
201 South Main St Ste 300  
Salt Lake City, UT 84111-2870  
Swift Code #: CHASUS33  
ABA #: 021000021  
Parr Brown Gee & Loveless  
Account #: 912454114

**E-Check**

Name of Bank: \_\_\_\_\_  
Routing #: \_\_\_\_\_  
Account #: \_\_\_\_\_  
Name on Account: \_\_\_\_\_  
Account Holder Address: \_\_\_\_\_  
Amount: \$ \_\_\_\_\_

**EFT/ACH Pay Instructions**

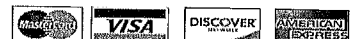
Routing #: 124001545  
Account #: 912454114

**\*3% fee for credit card transactions**

**Please reference your invoice # 925963**

**Online Payments:** <https://parrbrown.com/payment-portal>  
**Payments accepted by phone (801) 532-7840**  
Payable Upon Receipt

A finance charge of twelve percent (12%) per annum will accrue on any account not paid within thirty (30) days after the date of this invoice



**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receivership

May 26, 2023

Invoice: 925964  
Client: 176430  
Matter: 2

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**INVOICE SUMMARY**

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Asset Analysis & Recovery**

Professional Services	\$ 204,036.50
Total Costs Advanced	<u>\$ 1,812.28</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 205,848.78</b>

## PARR BROWN GEE &amp; LOVELESS

Invoice: 925964  
 Rust Rare Coin Receivership  
 Asset Analysis & Recovery

May 26, 2023  
 Client: 176430  
 Matter: 2

**PROFESSIONAL SERVICES RENDERED**

Date	Tkpr	Description	Hours	Amount
1/02/23	CMM	Review terms of settlement with investor; Draft settlement agreement for investor; Communicate settlement agreement to investor through counsel	2.80	728.00
1/03/23	JMC	Correspond with Wayne Klein and Jeff Balls re settlement payments and related issues; Review various clawback actions and discovery status	1.70	722.50
1/03/23	JAB	Conference with Joseph Covey re status; Conference with Robert Wing re settlements	.40	148.00
1/03/23	CMM	Review communications re settlement payment with net winner; Update settlement tracking document; Research issue re claim implicated in claw back; Review claimant documents for the same	4.20	1,092.00
1/03/23	RGW	Telephone call with counsel for Mr. Oberhansly; Telephone calls with counsel for Hess re settlement	.40	180.00
1/04/23	RGW	Telephone calls re Oberhansly complaint	.40	180.00
1/05/23	MTH	Correspond with Claire McGuire re protective order for Darren Nelson	.10	40.50
1/05/23	CMM	Review emails between Cynthia Love and various parties relating to investor settlement; Draft settlement and communicate re the same with opposing counsel; Review documents related to Ault lawsuit; Draft initial complaint for the same	4.60	1,196.00
1/05/23	RGW	Address Oberhansly service issue	.20	90.00
1/06/23	MTH	Review proposed protective order and stipulated motion re Darren Nelson matter; Review and respond to correspondence from Claire McGuire re protective order; Correspond with Darren Nelson re protective order and stipulated motion	.50	202.50
1/06/23	JAB	Correspond with Jonathan Hafen re settlement; Telephone conference with Ryan Pahnke; Conference with Claire McGuire; Email Jeff Shaw; Review settlement agreement	1.00	370.00
1/06/23	CMM	Draft protective order and Motion for Darren Nelson claw back	1.70	442.00
1/06/23	CMM	Communicate with Mike Hoppe re Darren Nelson case; Review documents for initial disclosures; Research redactions needed in the instance of a pro se litigant; Communicate with Susie Bailey re production; Review responses and documents sent in the Larsen case	5.60	1,456.00
1/06/23	CMM	Revise settlement agreement with investor per comments from Jeff Balls	.60	156.00
1/06/23	CBB	Send follow up email to Adam Wells and Ronald Wells re claim stipulation (.1); Discuss claim stipulation on phone call with Adam Wells (.2)	.30	88.50
1/09/23	MTH	Review and evaluate discovery responses from Richard Larsen; Correspond with Joe Covey and Claire McGuire re discovery responses and discovery strategy	.50	202.50
1/09/23	MTH	Review and respond to correspondence from Claire McGuire re documents from Larsen	.10	40.50
1/09/23	CMM	Finalize and revise settlement agreement with Mr. Stillman; Communicate the same with Mr. Stillman's counsel Adam Dunn	.80	208.00



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1/09/23	CMM	Communicate with Mike Hoppe re discovery issues in Larsen case; Review documents produced by Larsen's counsel in response to discovery requests; Draft scheduling order in Wade clawback; Communicate with Jeff Balls re the same; Communicate with Susie Bailey re documents for Larsen case; Communicate with opposing counsel re the same; Review documents produced in response to discovery requests in the Larsen case	6.80	1,768.00
1/09/23	CY	Draft motion and order to amend scheduling order for Ben Wade; Draft motion and order to amend scheduling order for Jill Sagarin	.80	124.00
1/09/23	SB	Follow up re the close of discovery and update the team re future deadlines re Wade-Weilacher-Olsen-Hook-Berry, et al.; Email exchanges with Claire McGuire re the Richard Larsen production of documents; Troubleshoot and download same; Unitize the combined PDFs received from the second production of Richard Larsen; Upload the Richard Larsen production 02 materials to the vendor with instructions and specifications for the prepare a load file; Send the Wade-Weilacher-Olsen-Hook-Berry, et al. Amended Scheduling Order to the experts; Email to Jeff Balls re same; Review Rust tracking and update same; Email exchange and telephone call with Claire McGuire re the Larsen and Nelson productions	4.00	820.00
1/10/23	JMC	Correspond with Michael Hoppe and James Tracy re clawback litigation	.50	212.50
1/10/23	MTH	Meeting with Claire McGuire to discuss Darren Nelson and Rick Larsen matters; Review correspondence from opposing counsel in Larsen matter; Correspond with opposing counsel in Larsen matter re depositions and discovery; Review correspondence from Chauncey Bird re negotiations on claw back matter; Review correspondence from James Tracy re Larsen matter; Correspond with Joe Covey and Claire McGuire re Larsen matter; Review correspondence from Claire McGuire and Jeffrey Shaw re Larsen matter; Conference with Claire McGuire re Larsen	2.30	931.50
1/10/23	WOP	Research whether investor can secure investment with UCC-1	2.40	672.00
1/10/23	CMM	Draft stipulated motion and amended scheduling order in Sagarin matter; Communicate re the same with opposing counsel Ryan Pahnke; Prepare the same for filing; Attorney conference with Michael Hoppe re challenge to production in the Larsen claw back and need to schedule depositions; Attorney conference with Michael Hoppe re Daren Nelson claw back and needed discovery request and research; Attorney conference with Jeffery Balls re various claw back and claims registry issues; Review documents produced in the Larsen claw back	5.20	1,352.00
1/10/23	CBB	Review executed claim stipulation from Adam Wells and Ronald Wells and provide finalized version to Jeff Balls and discuss strategy with Jeff (.3); Review case notes and past correspondence with Laraine Maisey and draft and send email requesting additional documentation and information to Maisey (.4)	.70	206.50
1/10/23	CY	File motion and order to amend scheduling order for Jill Sagarin; Print out exhibits for Sagarin case and label for court reporter	1.00	155.00

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1/10/23	SB	Download and unzip the load file for the Richard Larsen Production 02; Modify the OPT and DAT files for same; Run the load file, load the images, link the natives and add OCR; Back up the database; Create reviewer tags; Email the information to Claire McGuire to assist with her review	1.90	389.50
1/11/23	JMC	Correspond with Michael Hoppe re Larsen litigation and discovery	.40	170.00
1/11/23	MTH	Review and evaluate correspondence from opposing counsel re discovery issues in Larsen matter; Review correspondence from legal team re discovery; Draft correspondence with opposing counsel re depositions, negotiations and other case issues in Larsen matter	.80	324.00
1/11/23	MTH	Review correspondence from opposing counsel re legal argument concerning deposition of Rust Tippet in Larsen matter; Research argument and respond with position to counsel for Larsen; Review correspondence from Jeff Shaw re valuation of gold in Larsen matter; Correspond with legal team re same	1.00	405.00
1/11/23	JAB	Review correspondence re clawback against Laraine Maisey; Review documents re same	.40	148.00
1/11/23	CMM	Communicate with paralegal Susie Bailey re a stop to redaction project and the need for production of documents in the Nelson claw back case; Review further financial documents sent by Nelson; Call with Darren Nelson re the possibility of settlement; Review email from Jeff Shaw re value of metals transaction admitted to by claw back defendant; Communicate with Mike Hoppe and Joe Covey re the same; Draft notice of appearance for Nelson clawback	6.20	1,612.00
1/11/23	CBB	Review strategy email from Jeff Balls and draft and revise stipulated motion to dismiss Igor Kovalenko from Wells Group claw back action (.7); Send motion to opposing counsel with request for approval and signature (.1)	.80	236.00
1/11/23	SB	Review the RRC Outlook email account; Review the website email account; Review pleadings; Prepare and send amended scheduling order to Jeff Shaw; Review tracking logs to update new scheduling deadlines	1.60	328.00
1/12/23	MTH	Review correspondence from Claire McGuire and Jeff Shaw re Larsen matter (.1)	.10	40.50
1/12/23	JLO	Meet re clawback claims against various investors	.40	154.00
1/12/23	JAB	Telephone conference with Jeff Shaw; Conference with Robert Wing	.70	259.00
1/12/23	CMM	Research financial information for Nelson claw back case sent by Mike Hoppe; Draft first set of discovery requests to Darren Nelson; Communicate with Jeff Shaw re responses in Larsen claw back to discovery requests	6.60	1,716.00
1/12/23	CY	Draft notice of appearance for Claire McGuire; Draft discovery requests	.30	46.50
1/13/23	MTH	Conference with Claire McGuire re Darren Nelson matter; Correspond with Darren Nelson re protective order; Review correspondence from Darren Nelson re protective order; Compile financial information re Darren Nelson matter	.40	162.00



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1/13/23	CMM	Communicate with Defendant Darren Nelson re judge assigned to case; Draft discovery requests to the same; Communicate with Michael Hoppe re previously produced financial documents and settlement discussions with the same; Review documents produced in the Larsen case related to settlement of dispute with the beneficiary defendants and Richard Larsen	6.40	1,664.00
1/16/23	MTH	Review Richard Larsen's discovery responses and draft challenges to same	1.40	567.00
1/16/23	JAB	Review status of matters; Review correspondence re dismissal of action against Igor Kovalenko; Review deposition of Jill Sagarin; Email Jeff Shaw re same; Analyze Sagarin clawback; Correspond with Jonathan Hafen re potential settlement for Jill Sagarin	3.10	1,147.00
1/17/23	JAB	Telephone conference with Jeff Shaw; Analyze clawback against Sagarin; Correspond with Matthew Barneck re deposition of Gaylen Rust; Review correspondence re Igor Kovalenko; Review settlement agreement with clawback defendant; Telephone conference with John Swallow re settlement agreement; Revise proposed settlement agreement; Email Jonathan Hafen re same	4.60	1,702.00
1/17/23	CMM	Review settlement payment sent by Kathy Bates; Update settlement tracker re the same; Review and analyze production from Larsen clawback; Review documents related to the sale of musical rights and needed authority for the Receiver to dispose of the same	6.80	1,768.00
1/17/23	CBB	In Wells Group, discuss stipulated motion with counsel for Igor Kovalenko and make requested revisions to stipulated motion; discuss case strategy with Jeff Balls	.60	177.00
1/17/23	RGW	Emails with Mark Pugsley and receiver re Hess matter	.60	270.00
1/18/23	JMC	Review and analyze several clawback settlements and litigation issues; Correspond with Jeff Balls re the same	1.00	425.00
1/18/23	MTH	Review correspondence from Darren Nelson re case; Review and revise analysis of Larsen discovery responses and correspond with Claire McGuire re same	.40	162.00
1/18/23	MTH	Meeting with Claire McGuire re Darren Nelson and case strategy (.4)	.40	162.00
1/18/23	JAB	Conference with Robert Wing; Conference with Joseph Covey and Claire McGuire; Review and revise Notice of Settlement Distribution Plan	2.50	925.00
1/18/23	CMM	Communicate with Susie Bailey and Walter Peterson re settlement information from the last quarter; Communicate with Jeff Balls re new Gregory settlement	.30	78.00
1/18/23	CMM	Review emails from George Hofman concerning purchase of musical IP; Meeting with Joe Covey concerning various Receivership issues including a motion for limited authority to sell musical rights, claims registry issues and claw backs	1.50	390.00
1/18/23	CMM	Review analysis from Michael Hoppe re discovery challenges from Larsen Defendants; Research issue of document production and responsibility of parties to respond with documents in their control	2.80	728.00

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1/18/23	CBB	Review, revise, finalize, and file stipulated motion to dismiss Igor Kovalenko and accompanying proposed order	.70	206.50
1/18/23	RGW	Emails with Jeff Shaw and attend to accounting issues re clawback cases; Review Hess redlines	1.10	495.00
1/18/23	RGW	Review documents re Oberhansly and Woodfin	.80	360.00
1/18/23	SB	Review emails and check payment tracking to respond to the emails from Joseph Covey and Walter Peterson	.40	82.00
1/19/23	JMC	Correspond with Jeff Balls re Gaylen Rust deposition; Review terms of clawback settlement and discovery issues	.70	297.50
1/19/23	MTH	Review and respond to correspondence from Jeff Balls and others re Gaylen Rust, potential deposition and strategy	.30	121.50
1/19/23	JAB	Conference with Joseph Covey re deposition of Gaylen Rust; Conference with Claire McGuire re same; Email RRC group re depositions; Email Matthew Barneck re motion to extend deadline and deposition of Gaylen Rust	1.20	444.00
1/19/23	CMM	Attorney conference with Jeff Balls re deposition of Gaylen Rust and timing issues; Review email re the same sent to all claw back attorneys	.50	130.00
1/20/23	MTH	Review and respond to correspondence from Claire McGuire re challenge to discovery responses in Larsen matter	.10	40.50
1/20/23	MJB	(Hafen v. Howell) Correspond with Jeff Shaw (0.2)	.20	78.00
1/20/23	JLO	Conference call with Jeff Shaw re various clawback actions	.50	192.50
1/20/23	JAB	Telephone conference with Jeff Shaw, Robert Wing, Tom Melton, and Joni Ostler;	2.10	777.00
1/20/23	CMM	Draft discovery requests for claw back action; Call with investor who would like to settle claim; Meeting with Michael Hoppe re the same; Draft initial settlement terms and need for updated financial documents and send to investor; Call with Darren Nelson re financial condition and possibility of bankruptcy; Draft email for Darren Nelson re need for updated financials within short time frame because of discovery limits; Communicate with Michael Hoppe re the same; Review documents in Larsen clawback; Review court entered dismissal of parties in Wells claw back action; Review claim question and provide analysis of the same	7.40	1,924.00
1/20/23	TMM	Prepare Guyon complaint; review receipts	4.60	2,070.00
1/20/23	SB	Review emails and the website; Update claims matrix; Email exchange with Kathy Bates re the Quarterly Report; Email Exchange with Jeffrey Shaw re the amended scheduling order; Review claims and clawback folders; Review emails from Jessica Houf re procedures	2.80	574.00
1/20/23	SB	Email exchange with Kathy Bates and Jeff Shaw re W-9 for Moyes Sellers and Hendricks; Review files; Email to Lori Stumpf re same	.30	61.50
1/23/23	JMC	Correspond with Jeff Balls and Michael Hoppe re various litigation matters	.30	127.50

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1/23/23	MTH	Review correspondence from Claire McGuire re communications with Darren Nelson; Review and revise draft correspondence with Darren Nelson re potential pathway to resolution; Review correspondence from Claire McGuire re Nelson	.50	202.50
1/23/23	MTH	Review and respond to correspondence from Larsen's counsel re deposition of Gaylen Rust	.20	81.00
1/23/23	JAB	Draft notice of claims procedure; Review documents for quarterly report	4.20	1,554.00
1/23/23	WOP	Continue analysis of loan payments	1.80	504.00
1/23/23	RGW	Emails re Hess and Woodfin matters	.50	225.00
1/23/23	SB	Review and respond to emails; Check the website; Update the matrix; Email to Lori Stumpf re updated address information for a claimant; Update the post claim communications for both Sergio Payan and Clint Serr; Email from CD Baby re payment	1.20	246.00
1/24/23	JMC	Correspond with Michael Hoppe and Claire McGuire re Larsen motion by beneficiaries; Review motion for summary judgment from beneficiaries of Larsen	.60	255.00
1/24/23	MTH	Review correspondence from court re filing in Larsen matter; Review summary judgment motion from Beneficiaries in Larsen case; Correspond with Joe Covey and Claire McGuire re evaluation of summary judgment motion	.90	364.50
1/24/23	MTH	Review and respond to correspondence from Claire McGuire and Joe Covey re summary judgment motion in Larsen matter	.10	40.50
1/24/23	MTH	Review and respond to correspondence from Joe Covey re response to summary judgment motion in Larsen matter	.10	40.50
1/24/23	JAB	Review and revise notice of settlement distribution plan; Correspond with Joseph Covey re same; Correspond with Robert Wing re settlement agreements	.90	333.00
1/24/23	CMM	Review summary judgement motion filed on behalf of the Beneficiary Defendants in Larsen claw back; Review email re the same sent by Michael Hoppe; Research discovery rule issues for opposition to the same	5.50	1,430.00
1/24/23	RGW	Telephone conference with Mark Pugsley re Hess matter and Woodfin matter; Emails re same	1.10	495.00
1/24/23	SB	Download the RRC_Muir Production 02 files; Extract load the load file; Backup the database; Copy the load file to the database; Modify the OPT and DAT files; Run the load file; Link the images and natives and add the OCR; Backup the database; Download the modified RRC_Percele Production 2 files; Extract load the load file; Backup the database; Copy the load file to the database; Modify the OPT and DAT files; Run the load file; Link the images and natives and add the OCR; Backup the database; Review and update the One Drive folders; Email a new link to the team with the update folders; Check the website; Update the OneDrive shared files; Send links to Lori Stumpf re same	3.70	758.50

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1/25/23	JMC	Correspond with Jeff Balls re clawback settlement strategy and discovery issues; Correspond with Michael Hoppe and Claire McGuire re summary judgment motion by beneficiaries in Larsen matter	1.00	425.00
1/25/23	RMB	Review docket and status of Dolores Batalla potential settlement and refinance; Communicate with Robb Jones re Dolores Batalla refinance and settlement; Review Troy Piantes email and review claimed potential investment; Review Mike Johnson file for documentation supporting claimed investments	1.80	729.00
1/25/23	MTH	Conference with Joe Covey and Claire McGuire re response to summary judgment motion; Conference with Claire McGuire re case strategy re summary judgment motion in Larsen matter	.70	283.50
1/25/23	JAB	Review litigation status for Haddock matter; Email Jonathan Hafen re settlements; Review Sagarin claim; Draft summary and settlement recommendation re same; Conference with Joseph Covey re settlements and notice of settlement distribution plan; Review and revise settlement distribution plan; Email Jonathan Hafen re same	3.70	1,369.00
1/25/23	CMM	Review summary judgement motion filed by beneficiary defendants; Review communications with James Tracy re assertion that beneficiary defendants obtained value; Research discovery rule; Meeting with Mike Hoppe and Joe Hoppe re opposition to the same	5.60	1,456.00
1/26/23	JAB	Conference with Robert Wing	.60	222.00
1/26/23	CMM	Analyze claim associated with clawback; Draft analysis of the same for Jeff Balls	2.60	676.00
1/26/23	RGW	Prepare motion for alternative service in Oberhansly matter; Review records re same	2.10	945.00
1/27/23	JMC	Correspond with Gary Longmore re tax return with Oberhansly; Correspond with Ray Strong re the same; Review potential response to IRS	.30	127.50
1/27/23	MTH	Review discovery responses in Larsen matter and draft challenges and meet and confer communication re insufficient responses	.80	324.00
1/27/23	MTH	Review and respond to correspondence from James Tracy re discovery dispute in Larsen matter	.10	40.50
1/27/23	JAB	Review information from Jessie Houf	.20	74.00
1/27/23	CMM	Review response sent to Larsen defendants re discovery issues in their first production; Review Larsen defendants partial response to the same; Research produced documents re allocation of funds from the trust for the same	4.60	1,196.00
1/30/23	JMC	Correspond with Lori Stumpf re settlement payments	.20	85.00
1/30/23	MTH	Conference with Claire McGuire re Darren Nelson matter	.10	40.50
1/30/23	JAB	Review correspondence re music; Correspond with Chauncey Bird re claim; Telephone conference with John Swallow re settlement; Correspond with Jeff Shaw	1.20	444.00



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1/30/23	CMM	Research musical IP rights and past agreements to purchase the same; Review agreements with Tunecore and CD baby as well as order granting Receiver authority to dispose of assets; Research sale of slightly valuable musical IP; Draft motion for limited authority to sell musical IP	5.40	1,404.00
1/30/23	CBB	In Wells Group collection matter, evaluation evidence provided by Laraine Maisey and compose strategy email to Jeff Balls and Jeff Shaw re potential settlement (1.6); Review additional correspondence from Jeff Balls and Jeff Shaw and discuss intermediary payment issue with Claire McGuire (.7); Draft strategy email re Kayleen Roberts substitution to Jessica Houf (subsequently sent to Susie Bailey) and discuss needed information in support of motion to substitute Kayleen Roberts's estate for Kayleen (.6); Review and analyze motion to substitute from Jeff Balls in separate matter, review court order on that motion (.7); Review and analyze Utah substantive and Federal procedural law re substitution of parties and begin drafting motion for substitution of party (3.2)	6.80	2,006.00
1/30/23	CBB	In Percell Group matter, discuss potential settlement with counsel for Rosaria and Charlotte Percell by phone and email (.6); Discuss needed financial disclosures for parties claiming to have insufficient means of payment with Claire McGuire (.3); Review parties' initial disclosures and discovery responses and identify setoff claimed by opposing counsel (.5); Compose and send email to opposing counsel re needed financial disclosures and submissions (.5); Review history of settlement discussions re Vanessa Percell (.2)	2.10	619.50
1/31/23	JMC	Correspond with Chauncey Bird and Jeff Shaw re clawback settlements and discovery issues; Correspond with Ray Strong, Jon Hafen, Gary Longmore and Ryan Yahnke re Oberhansly tax refund	1.30	552.50
1/31/23	JAB	Correspondence re Wells claims;	.60	222.00
1/31/23	CMM	Draft Motion for authority to sell musical IP, Prepare for claims meeting with Jeff Shaw and Jeff Balls; Communicate re Darren Nelson call with Mike Hoppe	7.20	1,872.00
1/31/23	CBB	In Wells group matter, review findings from Susie Bailey and communicate with litigation team re the same; Confirm with Jeff Shaw that Adam and Ronald Wells were net losers; Discuss dismissal and case strategy with Jeff Balls; Provide status report and case summary to litigation team; Discuss case and email correspondence with Claire McGuire	1.30	383.50
2/01/23	JMC	Correspond with Gary Longmore, Jon Hafen and others re Oberhansly tax return and related issues	.50	212.50
2/01/23	JLO	Discuss claim for breach of settlement agreement against investor and strategy for reaching assets; Review documents regarding the investor's financials	.80	308.00
2/01/23	CMM	Prepare for and attend meeting with Joni Olster re breach of contract lawsuit against Ault parties	.80	208.00

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2/02/23	MTH	Review and respond to correspondence from Claire McGuire re meet and confer in Larsen	.10	40.50
2/02/23	MTH	Review correspondence from opposing counsel re meet and confer in Larsen matter and correspond with Claire McGuire re same	.10	40.50
2/02/23	JLO	Analyze potential clawback claims against various investors; Emails to counsel for various investors re settlement discussions	2.80	1,078.00
2/02/23	JAB	Correspond with Susie Bailey; Telephone conference with Judson Pitts; Email Judson Pitts re verified financials; Correspond with Joni Ostler	.70	259.00
2/02/23	CMM	Communicate with opposing counsel in the Larsen claw back re meet and confer schedule; Research and pull documents for Joni Ostler in the Sargent 2 Group litigation; Research negotiations with Daniel Barnett with relation to potential claw back not yet resolved	1.80	468.00
2/02/23	CBB	In Wells group, review evidence in support of Maisey's settlement offer and discuss matter with Claire McGuire	.50	147.50
2/02/23	SB	Review emails and pleadings; Update the files re same	.80	164.00
2/03/23	JAB	Correspond with Beth Boland and Paul Scarlato re settlement distribution plan; Review and revise notice of settlement distribution plan; Review correspondence form Susie Bailey; Review notice of dismissal for Wells	2.40	888.00
2/03/23	CMM	Communicate with net winner re potential settlement; Communicate with opposing counsel re meet and confer in the Larsen matter; Review draft settlement distribution plan and subsequent communication about the same; Draft Motion and proposed order to dispose of musical IP; Review files associated with claims determinations related to claw back action	6.40	1,664.00
2/03/23	CBB	In Wells group, draft notice of dismissal of Adam Wells, Ronald Wells, and Rosalie Wells, and circulate to litigation group	.40	118.00
2/03/23	SB	Review files and the settlement tracking matrix; Prepare a list of issues re same; Draft email to Jeff Balls re policies and procedures; Review responses re same; Update settlement payments and other depositions on the Matrix	1.50	307.50
2/03/23	SB	Review pleadings, locate the amended scheduling order filed in the Taylor matter and send a copy to the Jeff Shaw	.30	61.50
2/06/23	MTH	Review and respond to Susie Bailey's queries re receivership (.2)	.20	81.00
2/06/23	JAB	Review motion to dismissal Adam and Ron Wells; Review correspondence re hymns	.60	222.00
2/06/23	CMM	Research use of 408 settlement negotiations in summary judgement opposition for beneficiary defendants for Larsen claw back; Research statute of limitations issues associated with voidable transfer statute and inherent discovery rule; Review years of communications with Larsen counsel; Set up meet and confer call with opposing counsel to contest responses to discovery requests	5.20	1,352.00

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2/06/23	CBB	In Wells Group, review Federal Rules of Civil Procedure and accompanying case law re voluntary dismissal of non-answering parties and revise notice of dismissal of the Wells Parties into motion to dismiss the Wells Parties and report on the same to Jeff Balls; Draft and revise proposed order granting motion to dismiss Wells Parties	2.70	796.50
2/06/23	CBB	In Wells Group, effectuate filing (and refiling) of motion to dismiss Wells Parties and accompanying proposed order and provide copies of filings to Wells Parties, litigation group, and Laraine Maisey	1.60	472.00
2/06/23	CBB	In the Wells Group matter, discuss issue of identifying representative of Kayleen Roberts's estate with Susie Bailey and Amanda Bradley, and research whether Kayleen's estate has been probated; Review and analyze law re substitution of parties	1.50	442.50
2/06/23	CBB	In Wells Group, review and analyze law re motions to suspend deadlines and begin drafting and revising motion to suspend scheduling order and stay proceedings	2.80	826.00
2/06/23	SB	Email exchange with Amanda Bradley re the Kayleen Roberts Trust; Email to Chaunceton Bird re same	.20	41.00
2/06/23	SB	Email exchange with Michael Hoppe re policies and procedures	.10	20.50
2/06/23	SB	Email from Blake Faulkner re music ownership and executing the Quitclaim Deed. Review and search inventory records for references to same	1.20	246.00
2/06/23	AB	Communications with Susie Bailey re estate of Kayleen Roberts, deceased; Review probate court filings; Communications with Susie Bailey and Chaunceton Bird re same	.40	82.00
2/07/23	MTH	Conference with Claire McGuire re Darren Nelson matter	.10	40.50
2/07/23	MTH	Review correspondence with Darren Nelson re case	.10	40.50
2/07/23	CMM	Communicate with claw back defendants re settlement and need for provision of financial documents; Discuss the same with Michael Hoppe; Research inquiry notice for an agent for amending pleadings in the Larsen matter	2.90	754.00
2/07/23	CBB	In Wells Group, draft and revise motion to suspend case deadlines and review precedent and past filings where litigants requested the same relief in support of drafting motion (6.7); Email draft to Jeff Balls and Joe Covey and request feedback and discuss strategy (.1)	6.80	2,006.00
2/07/23	RGW	Revise alternative service documents re Mr. Oberhansly	1.10	495.00
2/07/23	SB	Email communications with Joe Covey; Review email exchange with Blake Faulkner re Music Rights and the transfer and sale of same; Run multiple searches in Eclipse; Read and review emails; Open attachments to same; Locate information re ownership; Email exchange with Joe Covey re same; Email exchange with the vendor re troubleshooting blank database files	4.60	943.00
2/08/23	JMC	Correspond with Michael Hoppe re Larsen litigation	.10	42.50

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2/08/23	RMB	Communicate with Robb Jones re Dolores Batalla settlement status and joint status report; Review appraisal report and verified financial information from Dolores Batalla	.60	243.00
2/08/23	MTH	Review discovery responses and challenges in preparation for meet and confer re responses to Receiver's discovery requests in Larsen matter	.20	81.00
2/08/23	MTH	Review materials in preparation for meeting with opposing counsel; Meet with opposing counsel re discovery issues and settlement discussions; Conference with Claire McGuire re case strategy and discovery issues in Larsen matter	1.10	445.50
2/08/23	MTH	Correspond with Joe Covey and Claire McGuire re Larsen matter	.10	40.50
2/08/23	JAB	Correspond with Joseph Covey re Notice of Settlement Distribution Plan	.50	185.00
2/08/23	CMM	Review summary judgement motion of beneficiary defendants; Attorney conference with Michael Hoppe and Joseph Covey re strategy in Larsen claw back and need for response related to discovery issues; Research statute of limitation issues and discovery rule case law for opposition to the same	7.30	1,898.00
2/08/23	CMM	Prepare for and attend meet and confer meeting with James Tracy, Josh Lee and Michael Hoppe; Research issues of relevance and provision of financial documents discussed on the same call	1.10	286.00
2/08/23	CBB	In Wells Group matter, review order granting motion to dismiss the Wells parties and circulate to litigants and litigation team and discuss with Claire McGuire	.30	88.50
2/08/23	CBB	In Wells Group, review state law re substitution of parties and discuss case strategy with litigation team	.40	118.00
2/08/23	SB	Email communications with Joe Covey; Continue to review documents related to music rights and the transfer and sale of same; Run multiple searches in Eclipse; Read and review emails; Open attachments to same; Locate information re ownership; Email exchange with Joe Covey re same; Prepare and send pdf documents re ownership of Beloved Hymns	3.60	738.00
2/08/23	SB	Email exchange with SEO Werks who purchased Firetoss re website account changes; Email to the team re same	.20	41.00
2/09/23	CMM	Research rule 408 in relation to a motion for summary judgement; Research federal standard for rule 56(d) motions in response to summary judgment motion; Review initial disclosures of the beneficiary defendants and communications with their counsel; Review trust documents provided by Larsen	5.80	1,508.00
2/09/23	CBB	In Wells Group, meet with Matt Ball and discuss probate case specifics (.4); Review contact information for next of kin for Kayleen Roberts and discuss need for substitution of party with Michael Lee (son of Kayleen Roberts) (.4); Review and analyze public records in search of representative or power of attorney for Kayleen Roberts (.7)	1.50	442.50
2/09/23	SB	Review the deposit and update the tracking matrix re same; Review the emails from the Website and Outlook	.80	164.00



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 Rust Rare Coin Receivership  
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Date	Tkpr	Description	Hours	Amount
2/10/23	MTH	Meeting with Joe Covey and Claire McGuire re discovery and case strategy in Larsen and other matters	.80	324.00
2/10/23	CMM	Draft fact section of opposition to summary judgement filed by beneficiary defendants in the Larsen claw back; Attorney conference with Joseph Covey and Michael Hoppe re response to Larsen meet and confer and relevance issues	4.20	1,092.00
2/10/23	CY	Draft opposition for motion for summary judgment for Larsen trustback	.70	108.50
2/13/23	JMC	Correspond with Jeff Balls and Claire McGuire re various clawback cases	.50	212.50
2/13/23	JAB	Review settlement agreement tracking log; Correspond with Susie Bailey re same; Conference with Claire McGuire and Joseph Covey re claw back actions	.60	222.00
2/13/23	CMM	Draft discovery requests in Darren Nelson claw back; Research and draft follow up to meet and confer call with Larsen defendants; Research issues related to opposition to beneficiary defendants summary judgement motion	6.20	1,612.00
2/13/23	CBB	Review status of case and follow up with Jeff Balls and Joe Covey re motion to suspend deadlines in Wells Group clawback	.20	59.00
2/13/23	SB	Email exchanges re payments and settlement tracking; Update the matrix re same; Review files re same	1.00	205.00
2/14/23	RMB	Review Dolores Batalla claw-back file documents in connection with preparation of summary judgment motion; Review correspondence with Robb Jones; Analyze investment account for Adrian Alvarez and Augustin Rico for Dolores Batalla potential setoffs and default judgment against Adrian Alvarez	2.90	1,174.50
2/14/23	MTH	Review and evaluate draft correspondence to counsel in Larsen matter re discovery requests; Review and revise draft discovery requests to Darren Nelson and correspond with Claire McGuire re same	.60	243.00
2/14/23	MTH	Conference with Claire McGuire re discovery requests to Darren Nelson	.10	40.50
2/14/23	JAB	Review claw back matrix; Review correspondence from Vi Tran; Conference with Claire McGuire	1.60	592.00
2/14/23	CMM	Review and analyze entire supplemental production of text messages by Rick Larsen; Review feedback from Michael Hoppe re discovery requests to Darren Nelson; Serve the same on Darren Nelson; Communicate with Vi Tran re use of AEO documents in Lugli action against Zions with respect to the deposition of Gaylen Rust; Review the same documents for personal identifying information; Discuss re designation with Jeffery Balls	9.60	2,496.00
2/14/23	CY	Edit discovery requests for Darren Nelson	.30	46.50
2/15/23	JMC	RIGHT MATTER? Correspond with Jeff Balls re class action distribution issues	.30	127.50

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Date	Tkpr	Description	Hours	Amount
2/15/23	JLO	Conference with BRG re evidence and calculations on claim against Ellingfords; Analyze evidence re claims against Ellingfords; Internal communication re strategy re claims against Ellingfords; Review evidence re claims against additional investor; Emails with outside counsel for additional investor	1.30	500.50
2/15/23	JAB	Telephone conference with Ryan Pahnke re Sagarin; Conference with Robert Wing; Review correspondence from Vi Tran	.50	185.00
2/15/23	CMM	Review documents provided in supplemental production from Larsen; Communicate with opposing counsel re documents that were not readable; Research standard for provision of native files; Draft introduction of opposition to summary judgement motion in response to filing by beneficiary defendants	5.60	1,456.00
2/16/23	RMB	Review Dolores Batalla file and Rico group investment documents and analysis; Conference with Jeff Balls re settlement strategy for Dolores Batalla claim; Communicate with Robb Jones re refinance issues and settlement; Review financial information provided by Dolores Batalla and asses financial hardship	1.20	486.00
2/16/23	JAB	Conference with Rodger Burge; Conference with Robert Wing and Claire McGuire re clawback actions	1.40	518.00
2/16/23	WOP	Call with Joe Covey re status of loan analysis; Review loan documents re same	1.40	392.00
2/16/23	CMM	Research standard for rule 56(d) Motions in federal court; Draft rule 56(d) opposition in response to beneficiary defendants summary judgment motion; Draft argument section with respect to subsequent transferees	5.60	1,456.00
2/16/23	SB	Review and respond to emails; Update post claim files	1.00	205.00
2/17/23	RMB	Prepare status report for Dolores Batalla claw-back; Communicate with Robb Jones re Dolores Batalla settlement options and filing of joint status report with Court; Review Dolores Batalla investment records and analysis and evaluate possible settlement alternatives; Analyze claims and potential setoff amounts for Adrian Alvarez, Dolores Batalla, Junita Alvarez, and Augstin Rico; Review settlement agreement for Guadalupe Valencia and status of settlement; Review correspondence file with Brandon Smith re Guadalupe Valencia settlement; Communicate with Brandon Smith re Guadalupe Valencia settlement payments	5.20	2,106.00
2/17/23	MTH	Conference with Claire McGuire re summary judgment motion in Larsen matter; Review discovery issues in Larsen matter; Conference with Claire McGuire re discovery issues in Larsen matter; Draft correspondence to counsel for Larsen re discovery dispute and revised requests	1.00	405.00
2/17/23	JAB	Telephone conference with John Swallow; Call Judson Pitts; Draft settlement agreement for Kathy Avis	1.00	370.00
2/17/23	CMM	Draft opposition to summary judgement motion and prepare exhibits for the same; Review productions of Larsen and Beneficiary defendants for information of distributions from the trust	2.50	650.00

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2/17/23	CMM	Draft opposition to summary judgement and rule 56(d) motion response to summary judgement filed by beneficiary defendants in Larsen matter; Review trust documents and communications re distributions made	4.80	1,248.00
2/17/23	RGW	Review order for alternative service and arrange for alternative service	.20	90.00
2/18/23	JAB	Review correspondence re Batalla clawback	.20	74.00
2/20/23	RMB	Review Troy Piantes correspondence file and prepare settlement proposal	.70	283.50
2/20/23	JAB	Review scheduling order; Email Judson Pitts re same	.30	111.00
2/21/23	JMC	Review and revise opposition to summary judgment motion and supporting declaration in Larsen case; Correspond with Michael Hoppe re the same	3.90	1,657.50
2/21/23	RMB	Review prior motions for summary judgment in connection with preparation of summary judgment motion for Dolores Batalla; Review investment documents for preparation of declaration of Jeff Shaw for Dolores Batalla summary judgment motion	1.40	567.00
2/21/23	MTH	Review and revise opposition to motion for summary judgment; Review and revise declaration in support of opposition; Conference with legal team re filings	6.10	2,470.50
2/21/23	MTH	Review and revise opposition to motion for summary judgment and declaration and correspond with Claire McGuire re same	.20	81.00
2/21/23	CMM	Draft summary memo in opposition to summary judgement motion filed by beneficiary defendants; Draft declaration of Michael Hoppe to attach to Rule 56(d) motion; Research federal rule 56(d) motions; Draft rule 56(d) motion; Revise the same per feedback of Michael Hoppe; Prepare exhibits and appendix of the same; File memo in opposition to summary judgement motion	8.10	2,106.00
2/21/23	CY	Draft appendix for motion to summary judgment for Larsen trustback; Gather exhibits together; Email correspondence with Claire McGuire re same	.40	62.00
2/22/23	RMB	Review status of Andreini, Rico and Dearden claw-back actions; Evaluate settlement or default judgment for Mike Johnson	1.40	567.00
2/22/23	CMM	Research various claims still subject to tolling agreements including Flint and Dilley matters; Meet with potential claw back attorneys	3.70	962.00
2/22/23	CBB	Discuss claim and claw back status, strategy, and discovery issues in Larson and Wells with Claire McGuire	.90	265.50
2/23/23	JMC	Review judgment and order against Howells; Correspond with Matt Ball and Jon Hafen re the same	.30	127.50
2/23/23	RMB	Communicate with Robb Jones re Dolores Batalla claim; Review Dolores Batalla file and prepare summary judgment motion	3.20	1,296.00
2/23/23	MTH	Review information re various claw back actions and conference with Claire McGuire re same	.90	364.50
2/23/23	MTH	Conference with Claire McGuire re claw back action	.10	40.50
2/23/23	MTH	Review correspondence from Claire and draft correspondence with claw back defendant and revise the same	.30	121.50

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2/23/23	MJB	(Hafen v. Howell) Review ruling and judgment (0.5); Telephone conferences with Joe Covey and Jeff Balls (0.4); Research costs, stay and registration (0.7); Correspond with Joe Covey (0.3)	1.90	741.00
2/23/23	JAB	Review court order re Gretchen Howell litigation; Conference with Matt Ball re same; Analyze impact on claims; Correspond with Chaunceton Bird re Wells litigation; Review prejudgment interest claim	2.00	740.00
2/23/23	CMM	Meeting with Michael Hoppe re claim against certain investor Trust; Review documents and communications re the same; Draft settlement communication re the same; Research remaining claim against another investor; Review communications with Percell defendants sent by Chaunceton Bird; Review courts ruling in the Howell matter and discussion re collection efforts for the same and potential motion for pre judgement interest; Draft updates for Receiver's report; Draft and communicate settlement offer to investor	6.70	1,742.00
2/23/23	CBB	Review status of Charlotte and Rosaria Percell settlement discussions and follow up with counsel for Percells	.30	88.50
2/23/23	CBB	Check case status and discover deadlines of Muir matter	.30	88.50
2/23/23	CBB	Review and revise motion for suspension of deadlines; Communicate with Jeff Balls and Joe Covey re motion; Check Utah Rules of Civil Procedure re pre-trial stays; Work with staff to file motion	3.30	973.50
2/23/23	SB	Review emails	.20	41.00
2/24/23	JMC	Correspond with Michael Hoppe re Larsen financials and correspondence; Review financials	.40	170.00
2/24/23	MTH	Review correspondence re claw back matter	.10	40.50
2/24/23	MTH	Correspond with Claire McGuire re claw back defendant	.10	40.50
2/24/23	MTH	Review and respond to correspondence from Andrew Collins re summary judgment motion in Larsen matter	.10	40.50
2/24/23	MTH	Review correspondence from James Tracy re Larsen matter and correspond with Joe Covey and Claire McGuire re same; Review financial materials provided by Larsen	.40	162.00
2/24/23	MTH	Correspond with Joe Covey re Larsen matter	.10	40.50
2/24/23	CMM	Communicate with investor re settlement offer; Meeting with Michael Hoppe re the same; Review communications and motions re suspension of case deadlines in Wells claw back; Communicate with Larsen opposing counsel re extension of deadlines for reply to opposition; Review financial disclosures and settlement communications sent by Richard Larsen	5.70	1,482.00
2/24/23	CBB	Discuss motion to stay deadlines in Wells matter with Cheryl Healy and effectuate filing (again) (.3); Provide as-filed motion to Laraine Maisey and review email from Laraine (.2)	.50	147.50
2/27/23	JMC	Correspond with Michael Hoppe and Claire McGuire re Larsen litigation; Review and analyze financials and related documents	1.00	425.00



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2/27/23	RMB	Review Roberto Asunez and Junita Alavarez investment related document in evaluating potential judgment amount for Dolores Batalla (.4)	.40	162.00
2/27/23	MTH	Review documents prepared by beneficiaries' counsel in Larsen matter and respond to correspondence re same	.20	81.00
2/27/23	MTH	Review materials in preparation for meeting re strategy re Larsen; Meet with Joe Covey and Claire McGuire re discovery plan, financial analysis and case strategy re Larsen	1.10	445.50
2/27/23	MTH	Review correspondence from Claire McGuire and from Jeff Shaw re financial analysis in claw back action	.10	40.50
2/27/23	MJB	(Hafen v. Howell) Research and draft motion to amend judgment (1.2)	1.20	468.00
2/27/23	JAB	Conference with Robert Wing; Review Woodfin documents	.80	296.00
2/27/23	CMM	Review bank statements and financial disclosures for inconsistencies sent by Richard Larsen in effort to settle; Communicate with Michael Hoppe and Joseph Covey re the same; Draft email to Jeff Shaw re settlement issues and accounting analysis of documents provided by Larsen	4.60	1,196.00
2/27/23	CBB	In Wells Group claw back action, review and respond to email from Laraine Maisey re potential claim stipulation (.3); Discuss potential claim stipulation with Jeff Balls (.1)	.40	118.00
2/27/23	RGW	Emails with opposing counsel re Woodfin; Conference with Jeff Balls re Woodfin; Review related documents	1.10	495.00
2/28/23	JMC	Correspond with Michael Hoppe and Claire McGuire re various clawback actions and legal strategy	1.20	510.00
2/28/23	MTH	Review issues re claw back case	.10	40.50
2/28/23	MTH	Review respond from claw back defendant; Meeting with Claire McGuire re strategy on claw back claim; Meeting with Joe Covey and Claire McGuire re strategy on various claw back claims; Review information provided by claw back defendant; Correspond with Claire McGuire re same	1.40	567.00
2/28/23	MJB	(Hafen v. Howell) Research and draft motion for award of prejudgment interest (1.1); Research and draft bill of costs (0.8); Correspond with Jon Hafen, Joe Covey and Jeff Balls (0.1)	2.00	780.00
2/28/23	JAB	Conference with Matt Ball; Review motion to amend judgment	.10	37.00
2/28/23	CBB	Review order from court staying proceedings and forward order along to Laraine Maisey	.20	59.00
2/28/23	SB	Email exchange with Robert Wing re the Woodfin matter; Review and update the Master Clawback; Review payments re same	.70	143.50
3/01/23	JMC	Correspond with Matt Ball re enforcement of Howell judgment; Correspond with local Arizona counsel re the same; Correspond with Jeff Balls re clawback settlement	1.70	722.50
3/01/23	RMB	Review Lugli investment documents and claim forms for purposes of preparing Complaint and identifying amounts to recover from various Lugli parties	2.30	931.50

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Date	Tkpr	Description	Hours	Amount
3/01/23	MTH	Review correspondence from James Tracy and Claire McGuire re discovery in Larsen matter	.10	40.50
3/01/23	MJB	(Hafen v. Howell) Correspond with Jeff Balls and Joe Covey (0.2); Telephone conference with Joe Covey (0.1)	.30	117.00
3/01/23	JAB	Correspond with Beth Boland re deposition of Ray Strong; Correspond with Ray Strong re same	.30	111.00
3/01/23	CMM	Review supplemental documents recordings Larsen's phone conversations with Gaylen Rust sent by Larsen's counsel; Communicate with Larsen's counsel re missing pages and information; Communicate with Zions counsel re the deposition of Ray Strong; Attorney conference with Jeff Balls re possible subjects for the same; Review filing of settlement distribution plan sent by Jeff Balls and response by Beth Boland; Review beneficiary defendants second set of discovery requests sent to the Larsen parties	5.40	1,404.00
3/01/23	SB	Research and review claims to prepare for the posting of the Claims Registry; Review incoming emails and handle same; Locate and send the Wells Scheduling Order to Jeff Shaw; Review checks and email to Lori Stumpf re same; Research the history of McBride payments; Email to Kathy Bates re same; Email to Jeff Balls re CD Baby payment tracking	2.20	451.00
3/02/23	JMC	Correspond with Michael Hoppe re clawback	.10	42.50
3/02/23	RMB	Communicate with Robb Jones re Dolores Batalla claw-back claim; Review Guadalupe Valencia settlement agreement; Prepare motion for summary judgment against Dolores Batalla	2.60	1,053.00
3/02/23	MTH	Review and revise correspondence with claw back defendant re negotiations; Review discovery requests from beneficiaries in Larsen matter and correspond with legal team re same	.70	283.50
3/02/23	MTH	Review and respond to correspondence from Claire McGuire re claw back action	.10	40.50
3/02/23	MJB	(Hafen v. Howell) Correspond with Keith Hendricks (0.2)	.20	78.00
3/02/23	JAB	Correspond with Beth Boland re deposition and meeting; Correspond with Ray Strong	.20	74.00
3/02/23	SB	Research and review claims to prepare for the posting of the Claims Registry to assist with responding to same; Review incoming emails and handle same; Email to Joe Covey re the class claims process	5.50	1,127.50
3/03/23	MTH	Conference with Claire McGuire re discovery issues and meeting with expert in Larsen matter; Correspond with expert re same	.10	40.50
3/03/23	CMM	Review documents sent by Rick Larsen to assert inability to pay; Meeting with Joe Covey and Mike Hoppe re Larsen documents and litigation strategy; Communicate with Jeff Shaw re need for analysis of the same; Review filing of extension from beneficiary defendants for Reply in support of their motion for summary judgment	3.80	988.00
3/03/23	CBB	Review motion for extension of time filed in Larson claw back action	.10	29.50

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Date	Tkpr	Description	Hours	Amount
3/03/23	SB	Telephone call with Joe Covey to review the claims handling processes; Review court dockets and calendar upcoming deadlines to communicate with Jeffrey Shaw; Review the Claims Tracking and Analysis and obtain the status of multiple claims to assist with responding to emails; Telephone call with Robert Wing re research assignment re the Woodfin Group; Review the Woodfin materials; Email to Robert Wing the link for same Review multiple documents and the collection of materials on the share drive re same; Review incoming emails and handle same; Email to Jeff Balls re the Wade deadlines and request a new scheduling order	5.00	1,025.00
3/06/23	JMC	Correspond with Michael Hoppe, Claire McGuire and Jeff Shaw re Larsen litigation matter; Review Larsen financial information and respond to opposing counsel	1.60	680.00
3/06/23	MTH	Review and respond to correspondence from team and expert re meeting; Meet with expert re financial information from Larsen; Conference with Claire McGuire re claw back action	1.50	607.50
3/06/23	MTH	Draft response to Larsen's counsel re financial information and discovery plan and correspond with Joe Covey and Claire McGuire re same (.4)	.40	162.00
3/06/23	JAB	Review correspondence from Judson Pitts	.20	74.00
3/06/23	CMM	Communicate with expert Jeff Shaw re expert report in Sagarin claw back and potential for settlement; Meeting with Jeff Shaw, Joe Covey and Micheal Hoppe re Larsen's inability to pay documents and further information needed for settlement discussions; Review order filed in Larsen matter; Draft email follow up to Larsen parties	1.40	364.00
3/06/23	SB	Prepare a summary of calendar items and communicate them with Jeff Shaw; Email exchange with Jeff Balls re email monitoring and communications re same; Review claims files to prepare for responding the posting of the Claims Registry; Review incoming emails and handle same; Email to Robert Wing the IPro/Eclipse instructions; Run searches and review hits; Export a report for the document references to Woodfin and email to Robert Wing re same	5.20	1,066.00
3/07/23	JMC	Correspond with Michael Hoppe re Larsen lawsuit; Correspond with Jeff Shaw re Larsen financial information	.60	255.00
3/07/23	RMB	Review Dolores Batalla notes and claw-back related documents for purposes of preparation of motion for summary judgment; Analyze settlement and summary judgment strategy for Kennedy-Barnes group; Review Troy Piantes file for settlement counteroffer purposes	3.20	1,296.00
3/07/23	MTH	Correspond with Joe Covey and Claire McGuire re response to Larsen's counsel; Finalize response to Larsen's counsel on various issues and send same	.30	121.50
3/07/23	JAB	Correspond with Judson Pitts; Draft motion to amend scheduling order; Revise settlement agreement for Avis; Review docket for Sagarin; Call Ryan Pahnke re Sagarin matter; Telephone conference with Jeff Shaw	1.70	629.00

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3/07/23	CMM	Communicate with Michael Hoppe and Joe Covey re communications with opposing counsel in Larsen and need for further discovery; Draft third party subpoena to Lynn Evans; Review notice of zoom hearing related to summary judgement hearing; Review report sent by Jeff Shaw with analysis of bank statements and remaining issues to be addressed through document requests to Larsen and subsequent communication to opposing counsel	3.80	988.00
3/07/23	CBB	Review hearing notification in Larson claw back and accept zoom link calendar invite from court (.1); Review status of Wells group claw back and send follow up email to Jeff Balls re claim stipulation with Laraine Maisey (.2)	.30	88.50
3/07/23	CBB	Follow up with Amanda Bradley and discuss filing a probate action and review templates for initiating action	.30	88.50
3/07/23	SB	Prepare a summary of calendar items and communicate them with Jeff Shaw; Email exchange with Jeff Balls re email monitoring and communications re same; Review claims files to prepare for responding the posting of the Claims Registry; Review incoming emails and handle same; Email to Lori Stumpf re the Zions Claim 597; Email to Kathy Bates to request a payment ledger; Email exchange with Lori Stumpf re Joseph Rice documents; Review files re same	4.90	1,004.50
3/08/23	MTH	Review information provided by Jeff Shaw re Larsen financial information; Correspond with Jeff Shaw re same; Draft correspondence to Larsen's counsel re additional requests and information; Correspond with Joe Covey and Claire McGuire re same	.80	324.00
3/08/23	MTH	Review and revise correspondence to opposing counsel in Larsen matter; Review and respond to correspondence from Claire McGuire re revisions; Correspond with Larsen counsel	.40	162.00
3/08/23	JAB	Review settlement payments; Correspond with Ryan Pahnke; Draft motion to amend scheduling order for Sagarin	2.00	740.00
3/08/23	CMM	Communicate with investor re ability to pay and sale of property in order to settle Receiver's claim and discuss the same with Michael Hoppe; Communicate with Michael Hoppe and Joe Covey re need for multiple years of investment activity in the Larsen ability to pay analysis; Review proposed motion and order sent by Larsen counsel and discuss the same with Michael Hoppe; Review communications related to needed deposition dates	1.40	364.00
3/08/23	SB	Attend the Rust Claims Coordination Meeting; Email exchange with Jeff Balls re email monitoring and communications; Review claims files to prepare for responding the posting of the Claims Registry; Review incoming emails and handle same; Prepare a claims tracking sheet for the Zions Class Action Claims; Share the OneDrive replacement folder with the team; Review the Claims Registry Instruction, the Claims Response Form and the Claims Response Bar Date Notice; Review the mailing list for the Zions Class Action Claims Proposed Settlement	3.00	615.00



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3/09/23	RMB	Review motion for partial summary judgment briefs for Kennedy-Barnes group; Review Kennedy-Barnes group claw-back claim file notes and documents; Prepare reply in support of motion for partial summary judgment	2.70	1,093.50
3/09/23	MTH	Review correspondence from opposing counsel in Larsen matter re discovery; Correspond with Claire McGuire re same	.30	121.50
3/09/23	JAB	Review exhibits from Gaylen Rust deposition; Conference with Claire McGuire re same	1.00	370.00
3/09/23	CMM	Review scheduling order sent by Josh Lee; Discuss the same with Michael Hoppe and potential scheduling of depositions; Communicate with Zions counsel re scheduling of deposition with Gaylen Rust; Review additional documents sent by Rick Larsen	2.90	754.00
3/09/23	CMM	Review email from Zions counsel re designation of deposition exhibits; Attorney conference with Jeff Balls re the same; Communicate need for Gaylen's deposition transcript with Zions counsel	.90	234.00
3/09/23	SB	Review incoming emails and handle same; Review pleading files and upcoming deadlines; Review Jessica Houf's emails re the McBride payments; Email exchange with Kathy Bates re same; Update the Settlement Tracking matrix re same	2.60	533.00
3/10/23	JMC	Correspond with Gary Longmore re Oberhansly tax return and timing	.30	127.50
3/10/23	RMB	Review depositions of Lyle and Jill Probst and Pamela Sanchez as part of preparing reply memorandum in support of motion for partial summary judgment; Research federal case law on "ownership" definitions and tests for purposes of disputed investments in Kennedy-Barnes matter	3.30	1,336.50
3/10/23	MTH	Conference with Joe Covey re Larsen matter; Conference with Claire McGuire re Larsen matter; Correspond with opposing counsel re depositions; Correspond with opposing counsel re stipulation and order	.50	202.50
3/10/23	JAB	Email Judson Pitts re scheduling order; Review IRS letter; Review correspondence re claims; Finalize amended scheduling order for Wade; Correspond with Ryan Pahnke; Telephone conference with Jeff Shaw; Review changes to Sagarin deposition; Review Gaylen Rust deposition transcript	1.80	666.00
3/10/23	CMM	Review early motion for summary judgement filed by Jeff Balls; Review information sent by Darren Nelson and draft fact section of summary judgement motion for the same; Review confidential deposition transcript of Gaylen Rust sent by Zions counsel; Communicate with opposing counsel in Larsen matter; Review communication with opposing counsel in Percell matter	3.80	988.00
3/10/23	CBB	Review and respond to email from Jeff Shaw re expert disclosure deadline in Percell litigation (.3); Discuss expert disclosures with Claire McGuire (.1); Review case scheduling order and communications with opposing counsel (.2); Email opposing counsel re status of Percell's last settlement offer and review response re intent to declare inability to repay (.3)	.90	265.50

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 Matter: 2

Date	Tkpr	Description	Hours	Amount
3/10/23	CBB	In Wells groups claw back, review Utah's Uniform Probate Code and review form filings from Amanda Bradley in preparation for drafting probate petition (1.2); Begin drafting application for information appointment of personal representative and conduct people searches on westlaw to confirm info on heirs for inclusion in application (2.6)	3.80	1,121.00
3/10/23	SB	Review the scheduling orders and communicate upcoming deadlines to Jeff Shaw; Continue reviewing claim files to prepare for responding to the Claim Registry	4.60	943.00
3/13/23	RMB	Review Kennedy-Barnes motion for partial summary judgment briefs and supporting declarations and documents in assessing litigation and settlement strategy; Review other pending claw-back actions to determine issues in considering payor intent with claimed investments	2.80	1,134.00
3/13/23	MTH	Review correspondence from opposing counsel in Larsen matter re depositions and correspond with Joe Covey and Claire McGuire re same	.10	40.50
3/13/23	JAB	Email court clerk re proposed order; Correspond with Matthew Barneck re deposition; Review deposition of Gaylen Rust	2.80	1,036.00
3/13/23	CMM	Correspond with Jeff Balls re valuation questions for settlement discussions in Sagarin claw back; Review communication with opposing counsel re the same; Review documents submitted by counsel for investor trying to settle claim; Communicate with Jeff Balls re confidentiality designations for exhibits in Gaylen Rust depo; Correspond with opposing counsel and Michael Hoppe re depositions for Larsen matter and counsel availability; Discuss settlement tracking with Susie Bailey	2.90	754.00
3/13/23	CBB	In Wells group, draft and revise application for appointment of personal representative and work with staff to finalize, notarize, and file	3.90	1,150.50
3/13/23	CBB	In Percell matter, discuss expert report with Claire McGuire and Jeffrey Shaw, review report from Howell claw back, and draft and revise expert disclosures	5.10	1,504.50
3/13/23	SB	Login to the website; Review and handle emails; Email exchange with Jeff Balls re calls from potential claimants and responses to same; Review file status re same; Review scheduling order for claw back matters; Send new scheduling order to Jeff Shaw; Review the status of the Wade and Larsen schedule and calendar to check for the signed orders; Review Daniel Zarkou's Dropbox files and archive files no longer in use; Copy active files to the firm share drive; Email to Robert Wing re the Woodfin document review	3.20	656.00
3/13/23	AB	Communications with Chaunceton Bird re probate filings	.30	61.50
3/14/23	RMB	Review depositions of Kennedy Barnes defendants and spouses; Conference with Jeff Balls re litigation strategy for Kennedy Barnes motion for partial summary judgment; Conference with Robert Wing re summary judgment issues in Kennedy Barnes claw-back	2.80	1,134.00
3/14/23	JAB	Review depositions changes; Review Rust deposition	3.80	1,406.00
3/14/23	CMM	Review documents associated with potential claw back defendants; Draft initial complaint against the same	2.80	728.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 925964  
 Rust Rare Coin Receivership  
 Asset Analysis & Recovery

May 26, 2023  
 Client: 176430  
 Matter: 2

Date	Tkpr	Description	Hours	Amount
3/14/23	CBB	Discuss Gaylen Rust deposition with Claire McGuire (.4); Review and analyze claims in Percell and Wells claw back actions in light of Rust testimony	.70	206.50
3/14/23	CBB	Discuss expert disclosures in Percell with expert Jeff Shaw, and review and revise expert disclosures	.70	206.50
3/14/23	CBB	In Wells claw back matter, review and analyze civil cover sheet and probate filing application and discuss filing and needed information with Madison Morgan	.50	147.50
3/14/23	SB	Email from Kathy Bates with deposit information; Review the schedule for settlement payments; Identify past due payments and communicate with the team re same; Review the payments made this quarter and update the settlement claims tracking matrix; Conference with Claire McGuire re status of her cases and future filings re same; Review the filings and the pleading index for each claw back matter and not the status of same; Review emails on the website	4.70	963.50
3/15/23	RMB	Further review of Kennedy-Barnes group depositions in connection with preparing reply memorandum for motion for partial summary judgment and assessing potential settlement options	1.30	526.50
3/15/23	MTH	Review correspondence from opposing counsel in Larsen matter re requested information	.20	81.00
3/15/23	JAB	Conference with Claire McGuire; Conference with Chauncey Bird; Review deposition of Gaylen Rust; Review correspondence with Andrew Howell re deposition exhibits; Telephone conference with Jeff Shaw; Review deposition of Taylor	3.40	1,258.00
3/15/23	CMM	Review exhibits that Zions counsel is requesting declassification on; Review deposition of Gaylen Rust; Draft communication to Zions counsel; Attorney conference with Jeff Balls re the same; Communication with clawback defendant Darren Nelson re discovery requests; Review communication with James Tracy relating to document about financial state for Rick Larsen	4.90	1,274.00
3/15/23	CBB	In Wells group, discuss strategy re Laraine Maisey claim stipulation with Jeff Balls; Follow up with practice assistant re filing of probate matter	.30	88.50
3/15/23	CBB	In Wells group, discuss outstanding questions in newly filed probate matter with staff	.20	59.00
3/16/23	RMB	Review depositions in Kennedy Barnes claw-back for control and ownership purposes, and review investment related documents, in connection with preparation of reply in support of motion for partial summary judgment; Review Lugli and Andreini claw-back claims for purposes of assessing impact of considering intent of investments in claw-back cases	4.30	1,741.50
3/16/23	JAB	Review deposition of Taylor; Correspond with Matthew Barneck	1.20	444.00

## PARR BROWN GEE &amp; LOVELESS

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May 26, 2023  
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Date	Tkpr	Description	Hours	Amount
3/16/23	CMM	Communicate with Zions counsel re designation of exhibits for deposition of Gaylen Rust; Review deposition transcript and exhibits for the same; Communicate with Jeff Balls re privilege and work product issues for the same; Review financial documents provided by Larsen and answers to questions re the same ; Correspond with Darren Nelson re extension of deadline for discovery responses	4.40	1,144.00
3/16/23	CBB	In Wells group matter, review and revise motion to substitute party for Kayleen Wells' estate and follow up with staff re probate filing	.80	236.00
3/16/23	SB	Review emails re claims; Email exchange with Jeff Balls re same; Update the settlement tracking log	.80	164.00
3/17/23	JMC	Review and analyze settlement offer on clawback matter	.20	85.00
3/17/23	MTH	Review correspondence from claw back defendant and correspond with Claire McGuire re same	.10	40.50
3/17/23	MJB	(Hafen v. Howell) Research and draft request to submit for decision (0.4)	.40	156.00
3/17/23	JAB	Telephone conference with Jeff Shaw	.40	148.00
3/17/23	CMM	Review documents sent in the Larsen case and tag the same; Draft deposition notices for Larsen case and subpoena for Lynn Evans; Review current scheduling order and communicate with Darren Nelson re discovery extensions	3.20	832.00
3/17/23	CBB	In Percell matter, draft and revise expert disclosures and discuss feedback and revisions from expert Jeff Shaw with Jeff and incorporate Jeff's revisions (.8); Discuss required expert disclosure filing in federal court with colleagues (.3); Draft and revise list of experts for filing with court (.3); Serve expert disclosures on all counsel for record, and file list of expert with court (.3)	1.50	442.50
3/17/23	CBB	Review and analyze email and financial statement from opposing counsel in Percell matter re Vanessa Percell's financial statement and settlement offer	.20	59.00
3/17/23	CBB	In Wells group matter, discuss probate filings with staff	.10	29.50
3/20/23	JMC	Correspond with Matt Ball re hearing to augment Howell judgment	.20	85.00
3/20/23	RMB	Review depositions of Kennedy Barnes defendants and spouses for purposes of preparing reply in support of Motion for Partial Summary Judgment; Prepare reply in support of motion for partial summary judgment in Kennedy Barnes matter; Review Andreini investment group claw-back files and status of claims	3.20	1,296.00
3/20/23	MJB	(Hafen v. Howell) Conference with Joe Covey and Jeff Balls (0.1); Review opposition memorandum (0.1); Research and draft reply memorandum in support of motion for prejudgment interest (1.4)	1.60	624.00
3/20/23	JAB	Review correspondence from Beth Boland re deposition; Email Ray Strong re same; Email Matt Barneck re Taylor; Email Ryan Pahnke re settlement; Conference with Rodger Burge re claim; Review deposition of Taylor	1.80	666.00



## PARR BROWN GEE &amp; LOVELESS

Invoice: 925964  
Rust Rare Coin Receivership  
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May 26, 2023  
Client: 176430  
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Date	Tkpr	Description	Hours	Amount
3/20/23	CBB	In Percell matter, review email from opposing counsel re settlement offer and financial statement from Vanessa Maldonado, review and analyze financial statement, and review and analyze past settlement communications with counsel for Ms. Maldonado (.8); Review past requests for financial documentation needed from defendants for settlement discussions and email opposing counsel with list of needed additional documents (.4); Review scheduling order and docket filings (.2); Review and respond to email from counsel for Charlotte Percell and Rosaria Percell and discuss her request for extension of deadlines and expert disclosures (.5)	1.90	560.50
3/20/23	CBB	In Wells claw back action, review docket entries for newly filed probate action; review stay in federal court action	.30	88.50
3/20/23	RGW	Prepare for and attend meeting re distribution issue; Emails re same	1.30	585.00
3/20/23	SB	Login to the website and review and handle emails; Research and review the claw back pleading files; Locate, review and send the Larsen and Wade Scheduling Orders to Jeff Shaw	.80	164.00
3/20/23	SB	Review and handle emails	.20	41.00
3/20/23	JL	Attend planning meeting to discuss claims and clawbacks	1.00	190.00
3/21/23	RMB	Review Kennedy Barnes correspondence file for settlement negotiations; Meet with Jon Hafen and Jeff Balls re Dolores Batalla and Kennedy-Barnes matters, as well as discussing strategic litigation issues of payor payee treatment of investments in claw-back actions; Prepare settlement agreement for Kennedy Barnes claw-back group; Prepare settlement agreement for Dolores Batalla claw-back claim; Communicate with Robb Jones re Dolores Batalla settlement	6.60	2,673.00
3/21/23	JAB	Conference with Jonathan Hafen and Rodger Burge; Review deposition of Colette Taylor; Correspond with Chauncey re payor/payee analysis	3.10	1,147.00
3/21/23	CBB	In Wells group matter, review and analyze record documents and docket filings, and draft and send email to defendant Laraine Maisey re settlement abilities of Receiver and inability to settle for her offered figure	1.30	383.50
3/21/23	CBB	Review and analyze motion from Receiver requesting entry of objections barring third-party claims and accompanying order	.40	118.00
3/21/23	SB	Review and handle emails; Check calendar events	.40	82.00
3/22/23	RMB	Prepare settlement agreement for Dolores Batalla; Communicate with Robb Jones re settlement agreement; Review Pamela Sanchez claim in receivership action; Prepare Settlement Agreement for Kennedy-Barnes group; Prepare correspondence to Brad Schmidt re status hearing and settlement agreement; Evaluate potential judgment and collection of claw-back amounts for Adrian Alvarez	5.40	2,187.00
3/22/23	JAB	Telephone conference with Monique McElwee; Telephone conference with Jeff Shaw; Conference with Robert Wing; Review redactions for Gaylen Rust deposition exhibits; Review reply in support of prejudgment interest; Review deposition of Colette Taylor	3.00	1,110.00
3/22/23	RGW	Emails re distribution issue	.40	180.00

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Date	Tkpr	Description	Hours	Amount
3/22/23	RGW	Review answer from Mark Oberhansly; Call with opposing counsel re same	1.30	585.00
3/22/23	SB	Review and update the settlement tracking log; Review calendar of upcoming events; Review clawback files and status of same; Review and handle emails from the website; Check pleading files and update tracking log of same	2.50	512.50
3/23/23	JMC	Review reply to Howell's objection re prejudgment interest; Correspond with Matt Ball re the same	.40	170.00
3/23/23	RMB	Further analysis of Lugli investments and proper characterization; Further evaluation of Mike Johnson claw-back claim and potential settlement or dismissal; Prepare reply in support of motion for partial summary judgment for Kennedy-Barnes group	2.20	891.00
3/23/23	MJB	(Hafen v. Howell) Finalize reply memorandum (0.1); Conference with Jeff Balls (0.1)	.20	78.00
3/23/23	JAB	Telephone conference with Beth Boland, Steve Waterman, Andrew Howell, and Joseph Covey; Conference with Joseph Covey; Telephone conference with Jeff Shaw; Email Ray Strong re deposition; Email Steve Waterman re deposition of Ray Strong	5.40	1,998.00
3/23/23	JL	Prepare draft of plaintiff's rule 26(a) initial disclosures	1.20	228.00
3/24/23	RMB	Review Guadalupe Valencia settlement agreement and status of payments; Review verified financial information and claw-back file for Miriam Martinez and Luisa Marquez; Review Kennedy Barnes party depositions for reply in support of motion for partial summary judgment re control and intent of disputed investments	2.30	931.50
3/24/23	JAB	Correspond with Ray Strong; Review deposition of Colette Taylor; Review Howell's motion to amend judgment; Review declaration of Ray Strong to prepare for deposition meeting	4.00	1,480.00
3/24/23	CBB	In Wells group matter, discuss probate proceeding and needed death certificate with staff	.20	59.00
3/25/23	MJB	(Hafen v. Howell) Correspond with Joe Covey (0.2)	.20	78.00
3/27/23	JMC	Correspond with Jeff Balls re litigation and discovery issues in Taylor clawback action	.50	212.50
3/27/23	RMB	Prepare Reply in Support of Motion for Partial Summary Judgment; Review Adrian Alvarez investment analysis and correspondence for purposes of default judgment; Review Kennedy-Barnes investment documentation	3.80	1,539.00
3/27/23	JAB	Email Matt Barneck; Review Taylor documents; Conference with Joseph Covey re discovery	1.00	370.00
3/27/23	CBB	In Wells group matter, review email and potential settlement offer from Laraine Maisey (.1); Review and analyze court order re third-party claims, pleadings on file, and prior correspondence and provide Ms. Maisey with assurance of settlement figure and confirmation of Receiver's preferred resolution methods (.5)	.60	177.00

## PARR BROWN GEE &amp; LOVELESS

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May 26, 2023  
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Date	Tkpr	Description	Hours	Amount
3/28/23	RMB	Prepare Reply in Support of Motion for Partial Summary Judgment for Kennedy-Barnes group; Prepare for status conference with Court re Kennedy-Barnes claw-back action; Attend status conference with Court for Kennedy-Barnes claw-back; Analyze Adrian Alvarez and Augustin Rico investment records for default judgment purposes	2.80	1,134.00
3/28/23	MJB	(Hafen v. Howell) Conference with Jeff Balls (0.1); Research and draft opposition to motion to alter or amend judgment (3.0)	3.10	1,209.00
3/28/23	JAB	Draft discovery responses for Colette Taylor; Review Colette Taylor documents	.40	148.00
3/28/23	CMM	Research and draft settlement agreement with Tyler Thurgood; Communicate with Joe Covey and Jeff Balls re the same; Conference with Mike Hoppe re response to Darren Nelson's request for extension of fact discovery; Communicate with investor re settlement and ability to pay issues	2.80	728.00
3/28/23	CBB	Review email from counsel for Rosaria Percell and Charlotte Percell and draft and send email to opposing counsel re extension of deadline for rebuttal expert disclosures	.30	88.50
3/28/23	CBB	In Wells group, follow up with staff re status of probate motion	.10	29.50
3/29/23	RMB	Review Terri Andreini correspondence and investment documents for settlement offer purposes	.70	283.50
3/29/23	JAB	Conference with Jeff Shaw; Telephone conference with Ray Strong and Jeff Shaw; Review Strong declaration and notes; Correspond with Chauncey Bird re settlement	4.90	1,813.00
3/29/23	CMM	Review Darren Nelson communications and records; Review early summary judgement motions in various similar cases; Draft introduction and fact section of early summary judgement motion; Meet with Michael Hoppe re next steps in Larsen matter and Darren Nelson matter; Correspond with investor re settlement negotiations; Communicate with Darren Nelson re scheduling order	6.80	1,768.00
3/29/23	CBB	In Wells group, discuss settlement with Laraine Maisey and Jeff Balls	.30	88.50
3/30/23	JMC	Correspond with Matt Ball re motion to reconsider order	.10	42.50
3/30/23	RMB	Review Andreini claw-back group file documents and status in connection with preparation of default judgments and preparing settlement evaluation and recommendation for Troy Piantes and Terri Andreini	1.20	486.00
3/30/23	MJB	(Hafen v. Howell) Research and draft opposition to motion to amend judgment (0.5)	.50	195.00
3/30/23	JAB	Review settlement agreement; Correspond with Chauncey Bird; Draft discovery responses for Taylor; Correspond with Jonathan Hafen re same; Email Matthew Barneck re same	.70	259.00
3/30/23	CBB	Review email correspondence with Laraine Maisey (.2); Draft and revise settlement agreement (3.2); Provide settlement agreement to Maisey and discuss case resolution (.1)	3.50	1,032.50
3/30/23	RGW	Emails re Taylor issue	.30	135.00

**PARR BROWN GEE & LOVELESS**

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Date	Tkpr	Description	Hours	Amount
3/31/23	JMC	Review pleadings in Howell litigation	.20	85.00
3/31/23	MTH	Conference with Claire McGuire re case strategy on claw back actions; Correspond with opposing counsel in Richard Larsen matter re depositions	.40	162.00
3/31/23	CMM	Draft settlement letter to potential claw back target; Attorney conference re guidance for third party intermediary issues; Draft new guidance for response examples and intakes	4.60	1,196.00
3/31/23	CBB	In Wells group matter, review check received from Laraine Maisey (.1); email Laraine Maisey re the same, email Jon Hafen re the same, and discuss the check with Claire McGuire (.3); Visit Jon Hafen's office in attempt to receive signature (.1); Draft and revise motion to dismiss Laraine Maisey and accompanying proposed order (.7); Effectuate filing of motion and proposed order (.1); Send as-filed versions of motion and proposed order to Laraine Maisey with narrative explaining dismissal (.2)	1.40	413.00
3/31/23	CBB	Discuss judge's request for certificate of death for Kayleen Roberts internally (.2); Review Utah Law re parties that can request certificate of death and review Utah State Health Department Office of Vital Records processes and information re the same (1.7); Draft and revise letter to Office of Vital Records requesting certificate of death (1.8)	3.70	1,091.50

**TOTAL PROFESSIONAL SERVICES****\$ 204,036.50****SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Joseph M R Covey	425.00	22.10	9,392.50
Rodger M Burge	405.00	72.30	29,281.50
Michael T Hoppe	405.00	33.70	13,648.50
Matthew J Ball	390.00	11.80	4,602.00
Joni L Ostler	385.00	5.80	2,233.00
Jeffery A Balls	370.00	83.20	30,784.00
Chaunceton B Bird	295.00	71.30	21,033.50
Walter O Peterson	280.00	5.60	1,568.00
Claire M McGuire	260.00	256.10	66,586.00
Thomas M Melton	450.00	4.60	2,070.00
Robert G Wing	450.00	12.90	5,805.00
Susan Bailey - Paralegal	205.00	77.70	15,928.50
Amanda Bradley - Paralegal	205.00	.70	143.50
Jennifer Luft - Paralegal	190.00	2.20	418.00
Crista Yancey - Paralegal	155.00	3.50	542.50
<b>TOTALS</b>		<b>663.50</b>	<b>\$ 204,036.50</b>



## PARR BROWN GEE &amp; LOVELESS

Invoice: 925964  
 Rust Rare Coin Receivership  
 Asset Analysis & Recovery

May 26, 2023  
 Client: 176430  
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**COSTS ADVANCED**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
1/11/23	Check issued to DepomaxMerit for Jill Sagarin deposition transcript	568.20
1/31/23	PACER Electronic Court Records	4.30
1/31/23	Constable Reitz - Attempted Personal Service upon Mark Oberhansly of Summons & Complaint	193.75
1/31/23	January 2023 Westlaw charges	464.79
2/28/23	February 2023 Westlaw	32.99
3/03/23	Constable Reitz - Service of Court Order Authorizing Alternative Service on Mark Oberhansly	20.00
3/03/23	Constable Reitz - Service of Summons & Complaint Certified Mail to Mark Oberhansly	28.00
3/03/23	Constable Reitz - Services of Summons & Complaint Emailed to Mark Oberhansly	5.00
3/03/23	Constable Reitz - Service of Summons & Complaint on John D. Hancock	5.00
3/14/23	PACER Electronic Court Records	7.60
3/14/23	Green Filing - petition for informal appointment of personal representative; probate cover sheet	5.00
3/14/23	Davis Court - petition for informal appointment of personal representative; probate cover sheet	375.00
3/17/23	PACER Electronic Court Records	1.00
3/27/23	PACER Electronic Court Records	4.70
3/27/23	SimpleCertified Mail	6.15
3/31/23	March 2023 Westlaw charges	90.80
<b>TOTAL COSTS ADVANCED</b>		<b>\$ 1,812.28</b>
<b>TOTAL THIS INVOICE</b>		<b>\$ 205,848.78</b>

**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

May 26, 2023

Rust Rare Coin Receivership

Invoice: 925964  
Client: 176430  
Matter: 2

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**REMITTANCE ADVICE**

**RE: Asset Analysis & Recovery**

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**BALANCE DUE THIS INVOICE \$ 205,848.78**

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Please return this advice with payment to:

Parr Brown Gee & Loveless  
P.O. Box 11019  
Salt Lake City, UT 84147

**Wire Transfer Instructions**

JP Morgan Chase Bank  
201 South Main St Ste 300  
Salt Lake City, UT 84111-2870  
Swift Code #: CHASUS33  
ABA #: 021000021  
Parr Brown Gee & Loveless  
Account #: 912454114

**E-Check**

Name of Bank: \_\_\_\_\_  
Routing #: \_\_\_\_\_  
Account #: \_\_\_\_\_  
Name on Account: \_\_\_\_\_  
Account Holder Address: \_\_\_\_\_  
Amount: \$ \_\_\_\_\_

**EFT/ACH Pay Instructions**

Routing #: 124001545  
Account #: 912454114

**\*3% fee for credit card transactions**

**Please reference your invoice # 925964**

**Online Payments:** <https://parrbrown.com/payment-portal>  
**Payments accepted by phone (801) 532-7840**  
Payable Upon Receipt

A finance charge of twelve percent (12%) per annum will accrue on any account not paid within thirty (30) days after the date of this invoice



**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receivership

May 26, 2023

Invoice: 925965  
Client: 176430  
Matter: 3

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**INVOICE SUMMARY**

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Disposition of Assets**

Professional Services	\$ 9,523.50
Total Costs Advanced	<u>\$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 9,523.50</b>

## PARR BROWN GEE &amp; LOVELESS

Invoice: 925965  
 Rust Rare Coin Receivership  
 Disposition of Assets

May 26, 2023  
 Client: 176430  
 Matter: 3

**PROFESSIONAL SERVICES RENDERED**

Date	Tkpr	Description	Hours	Amount
1/17/23	JMC	Correspond with George Hofmann and Claire McGuire re sale of IP, general motion seeking approval and related issues	1.50	637.50
1/20/23	JMC	Correspond with Jon Hafen and counsel for the Church of Jesus Christ re sale of IP assets; Correspond with Claire McGuire re sale of music assets; Correspond with Chance Thomas re the same	.70	297.50
1/30/23	JMC	Correspond with George Hofmann and Blake Faulkner re the sale of music assets	1.80	765.00
2/01/23	JMC	Correspond with Jon Hafen re claims handling issues	.20	85.00
2/02/23	JMC	Correspond with Jon Hafen, Jeff Balls, Claire McGuire and Jeff Shaw re various claims issues and related matters	2.80	1,190.00
2/02/23	WOP	Review settlement agreement; Review payments made under settlement agreement; Correspond with buyer re payments	2.70	756.00
2/03/23	JMC	Correspond with Jeff Balls re alternative distribution plan; Correspond with Walter Peterson re the same	.60	255.00
2/06/23	JMC	Correspond with Blake Faulkner re sale of hymns and related issues; Research re Rust ownership of religious music	.60	255.00
2/06/23	CMM	Review agreement and communications with the church re the purchase of musical IP from the estate	.30	78.00
2/07/23	JMC	Review and locate music inventory lists and related items; Correspond with Blake Faulkner re purchase of music inventory; Correspond with Susie Baile re the same; Review and revise purchase of music by Cate Todd; Correspond with Jon Hafen re the same	3.60	1,530.00
2/07/23	CMM	Review communication with Blake Faulkner re sale of musical rights and ability to prove ownership of the same; Review communications with and redline of agreement sent to George Hofmann re sale of other musical IP	.40	104.00
2/08/23	JMC	Correspond with Susie Bailey re transfer documents for music sale; Review and analyze transfer document; Correspond with Blake Faulkner re the same; Correspond with Jeff Balls re class action claim payment issues	2.20	935.00
2/09/23	JMC	Correspond with Jeff Balls and class counsel re new claim in Zions class action	.20	85.00
2/10/23	JMC	Review and revise motion to sell music and other assets	1.40	595.00
2/14/23	JMC	Correspond with Jeff Balls re clawback matters	.30	127.50
3/07/23	JMC	Review and revise motion to sell Musical IP; Correspond with Claire McGuire re the same	.90	382.50
3/08/23	CMM	Review Motion for IP sales; Revise the same per comments from Joe Covey	2.50	650.00
3/15/23	JMC	Correspond with Lori Stumpf, Jeff Balls and Claire McGuire re claims registry and numerous claims issues; Review and revise claims notices	1.60	680.00
3/28/23	RCM	Conference with Joseph Covey to discuss quitclaim assignment of Nativity soundtrack and associated rights	.30	115.50

**PARR BROWN GEE & LOVELESS**

Invoice: 925965  
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 Disposition of Assets

May 26, 2023  
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**TOTAL PROFESSIONAL SERVICES \$ 9,523.50**

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Rate</b>	<b>Hours</b>	<b>Total</b>
Joseph M R Covey	425.00	18.40	7,820.00
Ryan C Morrison	385.00	.30	115.50
Walter O Peterson	280.00	2.70	756.00
Claire M McGuire	260.00	3.20	832.00
<b>TOTALS</b>		<b>24.60</b>	<b>\$ 9,523.50</b>

**TOTAL THIS INVOICE \$ 9,523.50**

**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receivership

May 26, 2023

Invoice: 925965  
Client: 176430  
Matter: 3

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**REMITTANCE ADVICE**

**RE: Disposition of Assets**

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**BALANCE DUE THIS INVOICE \$ 9,523.50**

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Please return this advice with payment to:

Parr Brown Gee & Loveless  
P.O. Box 11019  
Salt Lake City, UT 84147

**Wire Transfer Instructions**

JP Morgan Chase Bank  
201 South Main St Ste 300  
Salt Lake City, UT 84111-2870  
Swift Code #: CHASUS33  
ABA #: 021000021  
Parr Brown Gee & Loveless  
Account #: 912454114

**E-Check**

Name of Bank: \_\_\_\_\_  
Routing #: \_\_\_\_\_  
Account #: \_\_\_\_\_  
Name on Account: \_\_\_\_\_  
Account Holder Address: \_\_\_\_\_  
Amount: \$ \_\_\_\_\_

**EFT/ACH Pay Instructions**

Routing #: 124001545  
Account #: 912454114

**\*3% fee for credit card transactions**

**Please reference your invoice # 925965**

**Online Payments:** <https://parrbrown.com/payment-portal>  
**Payments accepted by phone (801) 532-7840**  
Payable Upon Receipt

A finance charge of twelve percent (12%) per annum will accrue on any account not paid within thirty (30) days after the date of this invoice



**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receivership

May 26, 2023

Invoice: 925966  
Client: 176430  
Matter: 5

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**INVOICE SUMMARY**

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Claims Administration**

Professional Services	\$ 72,219.00
Total Costs Advanced	<u>\$ 11,286.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 83,505.00</b>

## PARR BROWN GEE &amp; LOVELESS

Invoice: 925966  
 Rust Rare Coin Receivership  
 Claims Administration

May 26, 2023  
 Client: 176430  
 Matter: 5

**PROFESSIONAL SERVICES RENDERED**

Date	Tkpr	Description	Hours	Amount
1/03/23	JAB	Email Jeff Shaw; Review and revise claims registry	.50	185.00
1/06/23	JMC	Correspond with George Hofmann and Jon Hafen re sale of music rights to Kate Todd	.70	297.50
1/12/23	JAB	Telephone conference with Jeff Shaw; Review and revise claims registry	1.00	370.00
1/13/23	JMC	Correspond with Paul Scarlato re claims administration and notice issues	.80	340.00
1/16/23	JAB	Review and revise claims registry	.70	259.00
1/17/23	JAB	Review and revise claims	.30	111.00
1/18/23	JMC	Correspond with Paul Scarlato re claims issues involving class action parties; Correspond with Jeff Balls and Claire McGuire re the same	1.30	552.50
1/18/23	JAB	Review and revise claims registry	1.00	370.00
1/20/23	JAB	Correspond with Jeff Shaw	.30	111.00
1/21/23	JAB	Review and revise claims registry; Analyze claims	.40	148.00
1/23/23	JAB	Review and revise claims registry	2.80	1,036.00
1/24/23	JMC	Review and revise notice for distribution of Zions settlement amount; Correspond with Jeff Balls re the same	.60	255.00
1/24/23	JAB	Review and revise claims registry; Correspond with Jeff Shaw re same	2.80	1,036.00
1/25/23	JMC	Correspond with Jeff Balls re class action notice; Review and analyze notice	.90	382.50
1/25/23	JAB	Review and revise claims registry	2.80	1,036.00
1/26/23	JMC	Correspond with Jeff Balls and Jon Hafen re class action claims issues	.20	85.00
1/26/23	JAB	Review and revise claims registry	.80	296.00
1/27/23	JAB	Review and revise claim form	2.60	962.00
1/30/23	JAB	Review and revise claims registry	3.10	1,147.00
1/31/23	JAB	Review and revise claims registry	3.00	1,110.00
2/01/23	JAB	Conference with Jeff Shaw and Claire McGuire re claims registry; Review and revise claims registry	9.40	3,478.00
2/01/23	CMM	Prepare for and attend meeting with Jeff Shaw and Jeffery Balls re unreconciled claims and disbursements	7.80	2,028.00
2/01/23	CMM	Research notice given in case of possible claim failed to be filed for Lincoln County School District	.20	52.00
2/02/23	JAB	Conference with Jeff Shaw and Claire McGuire; Conference with Joseph Covey and Jonathan Hafen	7.50	2,775.00
2/02/23	CMM	Prepare for and attend claims reconciliation meeting with Jeff Shaw and Jeffery Balls; Attend settlement approval meeting with Joseph Covey and Jonathan Hafen	8.20	2,132.00
2/03/23	JAB	Review and revise claims registry	1.90	703.00
2/06/23	JAB	Review and revise claims registry	3.40	1,258.00
2/07/23	JAB	Conference with Jeff Shaw and Claire McGuire re claims registry	8.50	3,145.00



## PARR BROWN GEE &amp; LOVELESS

Invoice: 925966  
Rust Rare Coin Receivership  
Claims Administration

May 26, 2023  
Client: 176430  
Matter: 5

Date	Tkpr	Description	Hours	Amount
2/07/23	CMM	Prepare for and attend claims meeting with Jeff Shaw and Jeffery Balls; Communicate with Jonathan Hafen re rising tide issues; Update claims registry and claw back matrix	5.40	1,404.00
2/08/23	JAB	Review and revise claims registry	2.50	925.00
2/09/23	JAB	Review and revise claims registry; Conference with Jonathan Hafen re same	4.50	1,665.00
2/10/23	JAB	Review and revise claims registry; Conference with Jonathan Hafen and Claire McGuire re same; Telephone conference with Jeff Shaw	4.90	1,813.00
2/10/23	CMM	Prepare for and attend meeting with Jonathan Hafen and Jeffery Balls for claims approval and reconciliation meeting	3.80	988.00
2/13/23	JMC	Correspond with Ray Strong, Jon Hafen, Jeff Balls, Claire McGuire and Jeff Shaw re claims analysis, rising tide analysis and related issues	1.80	765.00
2/13/23	JAB	Review and revise claims registry; Conference with Ray Strong, Jeff Shaw, Jonathan Hafen, Joseph Covey, and Claire McGuire re claims registry	6.50	2,405.00
2/13/23	CMM	Meet re rising tide and distribution issues with Jeffery Balls, Jeff Shaw, Ray Strong, Joseph Covey, and Jonathan Hafen	2.50	650.00
2/14/23	JAB	Review and revise claims registry; Telephone conference with Jeff Shaw re same	2.40	888.00
2/15/23	JMC	Correspond with Steve Waterman re Leland Jacobson claim and related issues	.40	170.00
2/15/23	JAB	Review claims registry	.30	111.00
2/16/23	JMC	Correspond with Jeff Balls re claims treatment and related issues	.50	212.50
2/17/23	JAB	Telephone conference with Jeff Shaw re claims registry	1.20	444.00
2/20/23	JAB	Review and revise claims registry; Correspond with Jeff Shaw	2.10	777.00
2/21/23	JAB	Telephone conference with Jeff Shaw re claims registry; Review and revise claims registry	2.10	777.00
2/22/23	JMC	Correspond with Jeff Balls re claims issues	.20	85.00
2/22/23	JAB	Review claims registry; Draft and revise claims registry instructions	2.80	1,036.00
2/23/23	JAB	Review and revise claims registry; Telephone conference with Ray Strong and Jeff Shaw	2.40	888.00
2/24/23	JAB	Review and revise claims registry	.60	222.00
2/27/23	JMC	Correspond with Jeff Balls and Lori Stumpf re Zions claim issues	.40	170.00
2/27/23	JAB	Review and revise claims registry; Draft claims response instructions; Telephone conference with Brian Hyde	2.70	999.00
2/27/23	CMM	Research claims stipulation to resolve issue between various claims; Communicate with Jeffery Balls re the same; Review claims registry documents sent by Jeffery Balls	1.40	364.00
2/28/23	JAB	Correspond with Jeff Shaw re claims registry; Telephone conference with Jeff Shaw	2.00	740.00
3/01/23	JAB	Telephone conference with Jeff Shaw; Review and revise claims registry	1.30	481.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 925966  
 Rust Rare Coin Receivership  
 Claims Administration

May 26, 2023  
 Client: 176430  
 Matter: 5

Date	Tkpr	Description	Hours	Amount
3/03/23	JMC	Correspond with Susie Bailey, Jon Hafen and others re claim issues; Review Zions claims issues	2.60	1,105.00
3/07/23	JMC	Correspond with Susie Bailey, Jeff Balls and others re claims issues and meeting	.70	297.50
3/07/23	JAB	Review claims emails; Conference with Claire McGuire; Conference with Jeff Shaw; Review and revise claims registry	2.10	777.00
3/07/23	CMM	Communicate with investor re question on his claim; Organize meeting about new claims process with Susie Bailey, Joe Covey, Jeff Balls and Lori Stumpf; Attorney conference with Jeff Balls re new process for responses to claims registry publication	1.10	286.00
3/08/23	JMC	Correspond with Jeff Balls, Claire McGuire and Susie Bailey re claims handling issues	1.80	765.00
3/08/23	JAB	Telephone conference with Jeff Shaw; Conference with Joseph Covey, Claire McGuire, Lori Stumpf, and Susie Bailey re claims process	2.10	777.00
3/08/23	CMM	Meeting with Susie Bailey, Lori Stumpf, Jeff Balls and Joe Covey to RRC procedures for responses to claims registry and new claims process for Zions settlement; Review documents sent by claimant to prove ownership of Trust and subsequent communications re the same	2.60	676.00
3/09/23	JAB	Review claims registry; Revise claims registry instructions; Conference with Jeff Shaw	5.20	1,924.00
3/09/23	CMM	Review claims registry instructions packet; Communicate with Jeff Balls and Joe Covey re the same	1.40	364.00
3/09/23	CMM	Review filing from Wayne Klein to transfer claim CL0578 from Leland S. Jacobson to Zions Bank and memo of support for the same; Discuss the same with Jeff Balls	.80	208.00
3/10/23	JMC	Correspond with Jeff Shaw re claims issues	.40	170.00
3/10/23	JAB	Telephone conference with Wayne Klein re Leland Jacobsen claim	.60	222.00
3/11/23	JAB	Review receipt for documents; Draft and revise claims registry instructions; Email Matt Moscon re claim	1.90	703.00
3/13/23	JMC	Correspond with Jeff Balls, Jeff Shaw and Ray Strong re claims treatment and related issues; Begin review of final claims information	1.60	680.00
3/13/23	JAB	Review claims; Telephone conference with claimant re claim; Telephone conference with Joseph Covey, Ray Strong, and Jeff Shaw	4.00	1,480.00
3/14/23	JAB	Review and revise claims registry; Email party re claim; Telephone conference with Jeff Shaw re registry	4.10	1,517.00
3/14/23	CMM	Meeting with Susie Bailey re claims questions, response set up and settlement tracking issues	.60	156.00
3/15/23	JAB	Review and revise claims registry; Coordinate filing of claims registry; Telephone conference with Jeff Shaw; Conference with Claire McGuire; Correspond with Jeff Shaw and Ray Strong re claims registry instructions	3.40	1,258.00
3/16/23	JMC	Correspond with Jeff Balls re claims registry and related items	.30	127.50

## PARR BROWN GEE &amp; LOVELESS

Invoice: 925966  
 Rust Rare Coin Receivership  
 Claims Administration

May 26, 2023  
 Client: 176430  
 Matter: 5

Date	Tkpr	Description	Hours	Amount
3/16/23	JAB	Correspond with Jon Hafen re claims registry; Review documents for claims registry; Conference with Ray Strong and Jeff Shaw; Conference with Jonathan Hafen	2.50	925.00
3/17/23	JAB	Review and revise claims registry instructions; Coordinate production of claims registry; Review impact of settlement proceeds;	1.70	629.00
3/18/23	JAB	Correspond with Matt Moscon re claim	.10	37.00
3/20/23	JMC	Correspond with Jeff Balls, Jon Hafen and others re claims issues; Correspond with Jeff Shaw and Ray Strong re the same	2.00	850.00
3/20/23	JAB	Review claims registry	2.80	1,036.00
3/21/23	JAB	Conference with Jeff Shaw; Correspond re distributions; Conference with Jeff Shaw re claims distributions Review claims registry instructions; Review claims form	2.30	851.00
3/22/23	JMC	Correspond with Jeff Balls re claims analysis and related issues; Review Zions claims related issues	1.30	552.50
3/22/23	JAB	Email receivership group re distribution analysis; Conference with Joseph Covey; Conference with Robert Wing; Draft revision to claim instructions; Email David Clark re claims; Email claimant re claims	1.90	703.00
3/23/23	JMC	Correspond with Jeff Balls re claims registry changes	.60	255.00
3/23/23	JAB	Revise claims registry documents; Coordinate production of same; Review supplemental documents from Matt Moscon	1.50	555.00
3/24/23	JAB	Review claims form; Draft notice of filing of claims registry; Draft procedures for handling claims response forms	1.30	481.00
3/27/23	JMC	Review and analyze claim notice; correspond with Lori Stumpf re the same	.50	212.50
3/27/23	JAB	Coordinate filing and service of claims registry; Review email re claims registry; Telephone conference with Steve Welker; Review responses to claims registry; Email group re claims registry	3.70	1,369.00
3/28/23	JMC	Review and analyze IP music sale agreement; Correspond with George Hofmann and Ryan Morrison re the same	.80	340.00
3/28/23	JAB	Review claims responses; Review correspondence re claims; Telephone conference with claimants	4.00	1,480.00
3/28/23	CMM	Meet with new paralegal Jennifer Luft re responses to publishing claims registry; Review guidance sent by Jeff Balls re the same; Communicate wit IT re access to email account with RRC claims responses	1.20	312.00
3/29/23	JAB	Review responses to claims; Telephone conference with claimants re claims; Telephone conference with Matt Moscon	2.70	999.00
3/29/23	JL	Review claims emails; process claim response filed by Terry Fisher	.80	152.00
3/30/23	JAB	Review claims; Telephone conference with claimants; Telephone conference with Jeff Shaw	2.00	740.00
3/30/23	CMM	Attorney conference with Jeff Balls re responses to claims registry publication; Review responses to claims determinations; Draft responses to the same; Correspond with Jeff Balls and Jon Hafen re guidance and discretion for accepting responses	5.20	1,352.00

**PARR BROWN GEE & LOVELESS**

Invoice: 925966  
 Rust Rare Coin Receivership  
 Claims Administration

May 26, 2023  
 Client: 176430  
 Matter: 5

Date	Tkpr	Description	Hours	Amount
3/31/23	JMC	Review and finalize agreement to sell assets; Correspond with Jon Hafen and George Hofmann re the same	.60	255.00

**TOTAL PROFESSIONAL SERVICES \$ 72,219.00**

**SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Joseph M R Covey	425.00	21.00	8,925.00
Jeffery A Balls	370.00	141.00	52,170.00
Claire M McGuire	260.00	42.20	10,972.00
Jennifer Luft - Paralegal	190.00	.80	152.00
<b>TOTALS</b>		<b>205.00</b>	<b>\$ 72,219.00</b>

**COSTS ADVANCED**

Date	Description	Amount
	Copies - B & W	8,840.70
3/27/23	Postage (627 units x 3.90)	2,445.30

**TOTAL COSTS ADVANCED \$ 11,286.00**

**TOTAL THIS INVOICE \$ 83,505.00**

**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receivership

May 26, 2023

Invoice: 925966  
Client: 176430  
Matter: 5

---

**REMITTANCE ADVICE**

**RE: Claims Administration**

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**BALANCE DUE THIS INVOICE \$ 83,505.00**

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Please return this advice with payment to:

Parr Brown Gee & Loveless  
P.O. Box 11019  
Salt Lake City, UT 84147

**Wire Transfer Instructions**

JP Morgan Chase Bank  
201 South Main St Ste 300  
Salt Lake City, UT 84111-2870  
Swift Code #: CHASUS33  
ABA #: 021000021  
Parr Brown Gee & Loveless  
Account #: 912454114

**E-Check**

Name of Bank: \_\_\_\_\_  
Routing #: \_\_\_\_\_  
Account #: \_\_\_\_\_  
Name on Account: \_\_\_\_\_  
Account Holder Address: \_\_\_\_\_  
Amount: \$ \_\_\_\_\_

**EFT/ACH Pay Instructions**

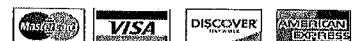
Routing #: 124001545  
Account #: 912454114

**\*3% fee for credit card transactions**

**Please reference your invoice # 925966**

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**Payments accepted by phone (801) 532-7840**  
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**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receivership

May 26, 2023

Invoice: 925967  
Client: 176430  
Matter: 5A

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**INVOICE SUMMARY**

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Zions Lawsuit – Claims Administration**

Professional Services	\$ 5,038.00
Total Costs Advanced	<u>    \$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 5,038.00</b>



## PARR BROWN GEE &amp; LOVELESS

Invoice: 925967  
 Rust Rare Coin Receivership  
 Zions Lawsuit – Claims Administration

May 26, 2023  
 Client: 176430  
 Matter: 5A

**PROFESSIONAL SERVICES RENDERED**

Date	Tkpr	Description	Hours	Amount
2/01/23	CMM	Communicate with Joseph Covey, Jonathan Hafen and Jeffery Balls re claims process for Gregory settlement and intake procedures with paralegals	.30	78.00
2/03/23	CMM	Review communication with Beth Boland related to timeline of plan for distribution; Communicate re the same with Jeffery Balls	.30	78.00
2/08/23	CMM	Review communications re and discuss BRG involvement in new claims process	.30	78.00
2/13/23	CMM	Review communication with Zions counsel re notice to the class about the distribution process and plan; Discuss the same with Jeffery Balls	.30	78.00
2/15/23	JAB	Telephone conference with Paul Scarlato	.20	74.00
2/27/23	CMM	Review first claim submitted in the Zions class action case; Discuss the same with Joseph Covey	.50	130.00
2/28/23	JAB	Review and revise notice of settlement distribution plan	.80	296.00
3/01/23	JAB	Review and revise notice of settlement distribution plan; Email Paul Scarlato re same; Email Zions counsel re same	1.00	370.00
3/03/23	CMM	Review and respond to emails from Lori Stumpf and Susie Bailey re Gregory settlement claims submissions tracking; Review email communication with Beth Boland and Paul Scarlato re final Notice and exhibits for claims process	.80	208.00
3/06/23	JMC	Correspond with Jeff Balls re Zions claims issues	.40	170.00
3/06/23	JAB	Review correspondence re claim; Revise notice of settlement distribution plan	2.80	1,036.00
3/07/23	JAB	Finalize notice of settlement distribution plan; Review correspondence re claims	.50	185.00
3/13/23	JAB	Review notice of hearing	.10	37.00
3/17/23	JAB	Prepare Zions claims registry	2.60	962.00
3/18/23	JAB	Review claims; Revise Zions claims registry	.60	222.00
3/20/23	JAB	Review and revise claims registry; Telephone conference with David Clark	2.00	740.00
3/21/23	JAB	Telephone conference with Paul Scarlato; Review claims registry	.80	296.00

**TOTAL PROFESSIONAL SERVICES****\$ 5,038.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Joseph M R Covey	425.00	.40	170.00
Jeffery A Balls	370.00	11.40	4,218.00
Claire M McGuire	260.00	2.50	650.00
<b>TOTALS</b>		<b>14.30</b>	<b>\$ 5,038.00</b>



**PARR BROWN GEE & LOVELESS**

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Invoice: 925967  
Rust Rare Coin Receivership  
**Zions Lawsuit – Claims Administration**

May 26, 2023  
Client: 176430  
Matter: 5A

**TOTAL THIS INVOICE**

**\$ 5,038.00**

**PARR BROWN  
GEE & LOVELESS**  
ATTORNEYS AT LAW

Rust Rare Coin Receivership

May 26, 2023

Invoice: 925967  
Client: 176430  
Matter: 5A

---

**REMITTANCE ADVICE**

**RE: Zions Lawsuit – Claims Administration**

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**BALANCE DUE THIS INVOICE \$ 5,038.00**

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Please return this advice with payment to:

Parr Brown Gee & Loveless  
P.O. Box 11019  
Salt Lake City, UT 84147

**Wire Transfer Instructions**

JP Morgan Chase Bank  
201 South Main St Ste 300  
Salt Lake City, UT 84111-2870  
Swift Code #: CHASUS33  
ABA #: 021000021  
Parr Brown Gee & Loveless  
Account #: 912454114

**E-Check**

Name of Bank: \_\_\_\_\_  
Routing #: \_\_\_\_\_  
Account #: \_\_\_\_\_  
Name on Account: \_\_\_\_\_  
Account Holder Address: \_\_\_\_\_  
Amount: \$ \_\_\_\_\_

**EFT/ACH Pay Instructions**

Routing #: 124001545  
Account #: 912454114

**\*3% fee for credit card transactions**

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**Payments accepted by phone (801) 532-7840**

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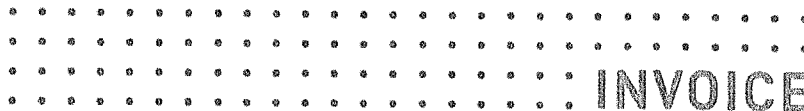
# **EXHIBIT C**

## **EXHIBIT C**

### **FIFTEENTH FEE APPLICATION**

#### **BRG's Fees & Expenses**

**EXHIBIT C**



Jonathan O. Hafen  
Parr Brown Gee & Loveless  
101 South 200 East, Suite 700  
Salt Lake City, UT 84111

June 1, 2023  
Client-Matter: 16222-25457  
Invoice #: 154023  
Tax ID # 27-1451273

Via Email: [jhafen@parrbrown.com](mailto:jhafen@parrbrown.com)

**RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.**

Services Rendered From January 1, 2023 Through March 31, 2023

Professional Services	\$ 134,647.00	USD
Voluntary Reduction	(2,236.50)	
Expenses Incurred	51.38	
<b>CURRENT CHARGES</b>	<b>\$ 132,461.88</b>	<b>USD</b>

**PAYMENT IS DUE BY July 1, 2023**

Please direct questions regarding this invoice to: Jeffrey Shaw at 801.364.6233 or [jshaw@thinkbrg.com](mailto:jshaw@thinkbrg.com).

**Please remit wire/ACH payment to:**

Bank Name: PNC BANK, N.A.  
SWIFT: PNCCUS33  
ABA #: 031207607  
Account Name: BERKELEY RESEARCH GROUP, LLC  
Account #: 8026286672  
Reference: 154023

**Please remit check payment to:**

BERKELEY RESEARCH GROUP, LLC  
PO BOX 676158  
DALLAS, TX 75267-6158

**Please remit express/overnight payment to:**

PNC BANK C/O BERKELEY RESEARCH GROUP, LLC  
LOCKBOX NUMBER 676158  
1200 E CAMPBELL RD, STE 108  
RICHARDSON, TX 75081

Remittance advice to be sent to:  
[remitadvice@thinkbrg.com](mailto:remitadvice@thinkbrg.com)



**INVOICE**

To: Jonathan O. Hafen  
 c/o: Parr Brown Gee & Loveless  
 RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

Page 2 of 14  
 Invoice # 154023  
 Client-Matter: 16222-025457

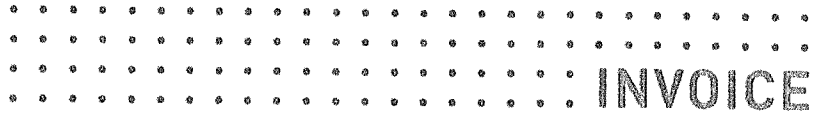
Services Rendered From January 1, 2023 Through March 31, 2023

**PROFESSIONAL SERVICES**

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
<b>Managing Director</b>			
Vernon Calder	440.00	1.30	572.00
Ray Strong	400.00	29.70	11,880.00
<b>Associate Director</b>			
Leif Larsen	355.00	2.90	1,029.50
Jeffrey Shaw	355.00	332.40	118,002.00
Jeffrey Shaw	0.00	6.30	N/C
<b>Case Assistant</b>			
Kellee Calder	145.00	0.10	14.50
Yuhao Xu	125.00	7.30	912.50
<b>Total Professional Services</b>		<b>380.00</b>	<b>132,410.50</b>

**EXPENSES**

Data Research	48.98
Postage	2.40
<b>Total Expenses</b>	<b>51.38</b>

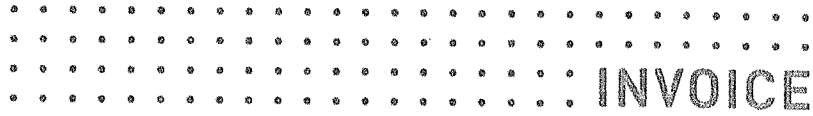


To: Jonathan O. Hafen  
c/o: Parr Brown Gee & Loveless  
RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

Page 3 of 14  
Invoice # 154023  
Client-Matter: 16222-025457

SUMMARY BY TASK CODE

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
300	Claims Process / Distribution	140.30	50,576.00
350	Net Winner / Claims Analysis	137.60	48,848.00
500	Recovery Litigation	51.10	18,253.00
600	Tax Compliance & Analysis	4.40	1,575.00
700	Civil Investigation / AG Inquiries	0.80	284.00
730	Deposition Preparation	39.50	12,874.50
950	Fee Application Preparation & Hearing	6.30	0.00
<b>Total Professional Services</b>		<b>380.00</b>	<b>132,410.50</b>



To: Jonathan O. Hafen  
 c/o: Parr Brown Gee & Loveless  
 RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

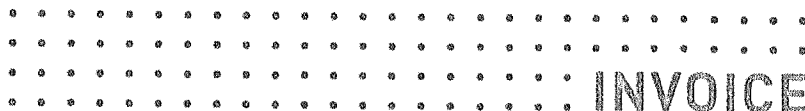
Page 4 of 14  
 Invoice # 154023  
 Client-Matter: 16222-025457

Services Rendered From January 1, 2023 Through March 31, 2023

**DETAIL OF PROFESSIONAL SERVICES**

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Task Code: 300 - Claims Process / Distribution</b>					
02/01/23	Jeffrey Shaw	Met with counsel to review claims and update claims registry.	8.00	355.00	2,840.00
02/02/23	Jeffrey Shaw	Met with counsel to review claims and update claims registry.	5.00	355.00	1,775.00
02/07/23	Jeffrey Shaw	Prepared for and met with counsel to review claims and update claim register.	8.50	355.00	3,017.50
02/08/23	Jeffrey Shaw	Follow-up with counsel regarding claims process.	0.30	355.00	106.50
02/08/23	Jeffrey Shaw	Analyzed claims register.	0.90	355.00	319.50
02/08/23	Ray Strong	Analyzed rising tide/claims issues for distribution model.	2.20	400.00	880.00
02/09/23	Jeffrey Shaw	Analyzed claims in connection with distribution model.	3.50	355.00	1,242.50
02/10/23	Jeffrey Shaw	Reviewed rising tide method and claims distribution model.	1.50	355.00	532.50
02/10/23	Ray Strong	Analysis of rising tide distribution methodology for claims register.	2.40	400.00	960.00
02/13/23	Jeffrey Shaw	Analyzed rising tide model.	1.60	355.00	568.00
02/13/23	Jeffrey Shaw	Meeting with counsel and Receiver regarding rising tide claim distribution model.	2.30	355.00	816.50
02/13/23	Ray Strong	Attended meeting with Receiver and counsel regarding plan of distribution and claims register.	2.30	400.00	920.00
02/13/23	Ray Strong	Analyzed rising tide distribution method in preparation for meeting with Receiver and counsel.	1.20	400.00	480.00
02/14/23	Jeffrey Shaw	Analyzed rising tide distribution method in connection with claims distribution.	1.30	355.00	461.50
02/14/23	Jeffrey Shaw	Call with counsel regarding claims register.	0.20	355.00	71.00
02/15/23	Jeffrey Shaw	Analyzed and updated claims register.	5.40	355.00	1,917.00



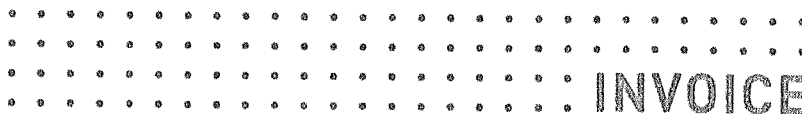


INVOICE

To: Jonathan O. Hafen  
 c/o: Parr Brown Gee & Loveless  
 RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

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 Invoice # 154023  
 Client-Matter: 16222-025457

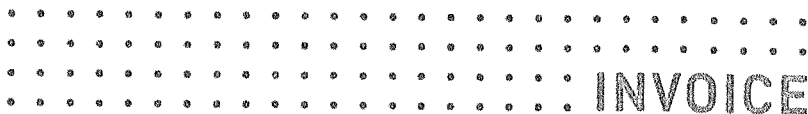
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/16/23	Jeffrey Shaw	Analyzed and updated claims register.	5.50	355.00	1,952.50
02/17/23	Jeffrey Shaw	Analyzed claims data and support and updated claims register.	6.40	355.00	2,272.00
02/17/23	Jeffrey Shaw	Call with counsel to discuss claims issues.	0.60	355.00	213.00
02/20/23	Jeffrey Shaw	Analyzed claims data and support and updated claims register.	6.20	355.00	2,201.00
02/21/23	Jeffrey Shaw	Analyzed claims data and support and updated claims register.	4.80	355.00	1,704.00
02/21/23	Jeffrey Shaw	Discussion with counsel regarding claims issues.	1.50	355.00	532.50
02/22/23	Jeffrey Shaw	Analyzed claims and updated claims register.	5.70	355.00	2,023.50
02/23/23	Jeffrey Shaw	Analyzed and updated claims register.	5.50	355.00	1,952.50
02/23/23	Jeffrey Shaw	Call with counsel to discuss claims register.	0.60	355.00	213.00
02/23/23	Jeffrey Shaw	Call with BRG to discuss claims register.	0.90	355.00	319.50
02/23/23	Ray Strong	Attended call with BRG regarding updates to claims register.	0.90	400.00	360.00
02/23/23	Ray Strong	Attended call with Counsel regarding updates to claims register.	0.50	400.00	200.00
02/27/23	Jeffrey Shaw	Analyzed and updated claims register.	4.50	355.00	1,597.50
02/28/23	Jeffrey Shaw	Analyzed and updated claims register.	2.80	355.00	994.00
03/01/23	Jeffrey Shaw	Discussion with counsel regarding claim register.	0.60	355.00	213.00
03/01/23	Jeffrey Shaw	Analyzed and updated claims register.	3.10	355.00	1,100.50
03/07/23	Jeffrey Shaw	Reviewed claims register.	0.50	355.00	177.50
03/07/23	Jeffrey Shaw	Discussion with counsel regarding claim register.	0.20	355.00	71.00
03/07/23	Jeffrey Shaw	Met with BRG regarding claims register.	1.00	355.00	355.00
03/07/23	Ray Strong	Met with BRG regarding updated claims register.	1.00	400.00	400.00
03/07/23	Ray Strong	Analyzed updated claims register in preparation for filing with the Court.	1.70	400.00	680.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/08/23	Jeffrey Shaw	Discussion with counsel regarding claims register.	0.40	355.00	142.00
03/08/23	Jeffrey Shaw	Reviewed forms to be included in claim filing.	2.10	355.00	745.50
03/09/23	Jeffrey Shaw	Reviewed claims register issues.	2.20	355.00	781.00
03/09/23	Jeffrey Shaw	Call with counsel to review claim register and litigation issues.	3.20	355.00	1,136.00
03/10/23	Jeffrey Shaw	Reviewed and updated claims registry.	0.50	355.00	177.50
03/13/23	Jeffrey Shaw	Reviewed claims register and Claims Registry Instructions.	3.50	355.00	1,242.50
03/13/23	Jeffrey Shaw	Call with counsel regarding claim registry.	1.00	355.00	355.00
03/13/23	Ray Strong	Reviewed and discussed claims register issues with Counsel in preparation for filing with the Court.	1.10	400.00	440.00
03/14/23	Jeffrey Shaw	Analyzed and updated claims registry.	3.40	355.00	1,207.00
03/14/23	Jeffrey Shaw	Call with counsel to discuss claims registry.	0.80	355.00	284.00
03/15/23	Jeffrey Shaw	Reviewed claim register instructions.	1.00	355.00	355.00
03/16/23	Jeffrey Shaw	Claims registry updates.	0.90	355.00	319.50
03/16/23	Jeffrey Shaw	Discussion regarding claim registry instructions.	0.30	355.00	106.50
03/16/23	Jeffrey Shaw	Reviewed claims registry and revised Claims Registry Instructions.	2.30	355.00	816.50
03/16/23	Jeffrey Shaw	Call with counsel regarding claims registry.	0.80	355.00	284.00
03/16/23	Ray Strong	Discussed claims instruction and claims registry with BRG.	0.30	400.00	120.00
03/16/23	Ray Strong	Analyzed latest claims registry sent by counsel for finalization.	0.40	400.00	160.00
03/16/23	Ray Strong	Analyzed claims instructions sent by counsel for finalization.	0.30	400.00	120.00
03/16/23	Ray Strong	Discussed Claims Register/Instructions with counsel.	0.80	400.00	320.00
03/17/23	Jeffrey Shaw	Reviewed and updated claims register schedules.	4.40	355.00	1,562.00
03/20/23	Jeffrey Shaw	Met with counsel to discuss claim registry and distribution issues.	1.70	355.00	603.50



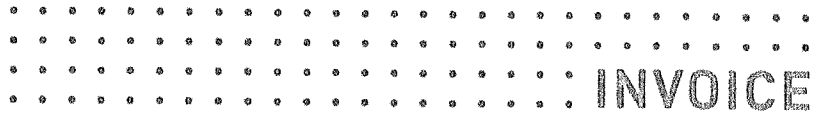
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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/20/23	Jeffrey Shaw	Prepared for meeting with counsel regarding claim issues.	0.70	355.00	248.50
03/20/23	Ray Strong	Attended call with Receiver and counsel to discuss issues relating to finalize claims register.	1.70	400.00	680.00
03/21/23	Jeffrey Shaw	Analyzed investor activity and claim registers.	2.60	355.00	923.00
03/21/23	Jeffrey Shaw	Reviewed Zions claim registry.	0.20	355.00	71.00
03/22/23	Jeffrey Shaw	Reviewed and provided feedback on issues related to claim distributions.	0.80	355.00	284.00
03/22/23	Ray Strong	Analyzed options regarding recovery percentage for rising tide methodology.	0.20	400.00	80.00
03/23/23	Jeffrey Shaw	Reviewed revised Claims Registry Instructions and email regarding the same.	0.80	355.00	284.00
03/23/23	Ray Strong	Reviewed revisions to Claims Register instructions sent by counsel.	0.10	400.00	40.00
03/29/23	Jeffrey Shaw	Call with counsel regarding claim issues.	0.70	355.00	248.50
<b>Total for Task Code 300</b>			<b>140.30</b>		<b>50,576.00</b>

**Task Code: 350 - Net Winner / Claims Analysis**

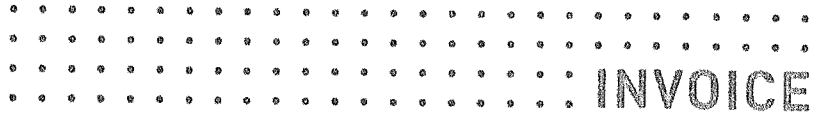
01/03/23	Jeffrey Shaw	Analyzed and reconciled [REDACTED] group claims.	7.10	355.00	2,520.50
01/04/23	Jeffrey Shaw	Analyzed and reconciled [REDACTED] group claims.	8.00	355.00	2,840.00
01/05/23	Jeffrey Shaw	Analyzed and reconciled [REDACTED] group claims.	7.50	355.00	2,662.50
01/06/23	Jeffrey Shaw	Analyzed and reconciled [REDACTED] group claims.	4.20	355.00	1,491.00
01/09/23	Jeffrey Shaw	Analyzed and reconciled [REDACTED] group claims.	7.30	355.00	2,591.50
01/10/23	Jeffrey Shaw	Analyzed and reconciled [REDACTED] group claims.	7.50	355.00	2,662.50
01/11/23	Jeffrey Shaw	Analyzed and reconciled [REDACTED] group claims.	7.00	355.00	2,485.00
01/12/23	Jeffrey Shaw	Analyzed and reconciled [REDACTED] group claims.	1.90	355.00	674.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/12/23	Jeffrey Shaw	Analyzed and reconciled █████ group claims.	3.90	355.00	1,384.50
01/13/23	Jeffrey Shaw	Analyzed and reconciled █████ group claims.	2.50	355.00	887.50
01/18/23	Jeffrey Shaw	Analyzed and reconciled █████ group claims.	4.70	355.00	1,668.50
01/18/23	Jeffrey Shaw	Analyzed and reconciled █████ group claims.	2.40	355.00	852.00
01/19/23	Jeffrey Shaw	Analyzed and reconciled █████ group claims.	2.70	355.00	958.50
01/19/23	Jeffrey Shaw	Analyzed investor activity in preparation for call with counsel.	1.00	355.00	355.00
01/20/23	Jeffrey Shaw	Analyzed and reconciled █████ group claims.	5.70	355.00	2,023.50
01/20/23	Jeffrey Shaw	Met with counsel regarding net winner issues.	0.60	355.00	213.00
01/20/23	Jeffrey Shaw	Prepared for meeting with counsel regarding net winner issues.	1.00	355.00	355.00
01/23/23	Jeffrey Shaw	Analyzed and reconciled █████ group claims.	6.50	355.00	2,307.50
01/24/23	Jeffrey Shaw	Responded to counsel inquiry regarding claims.	0.20	355.00	71.00
01/24/23	Jeffrey Shaw	Analyzed and reconciled █████ group claims.	6.20	355.00	2,201.00
01/25/23	Jeffrey Shaw	Analyzed and reconciled █████ group claims.	4.20	355.00	1,491.00
01/26/23	Jeffrey Shaw	Emails with counsel regarding claim issues.	0.50	355.00	177.50
01/26/23	Jeffrey Shaw	Analyzed and reconciled █████ group claims.	1.20	355.00	426.00
01/27/23	Jeffrey Shaw	Analyzed and reconciled █████ group claims.	1.00	355.00	355.00
01/30/23	Jeffrey Shaw	Analyzed activity and support for █████ per counsel request.	0.80	355.00	284.00
01/30/23	Jeffrey Shaw	Prepared email in response to counsel inquiry regarding █████ activity.	0.50	355.00	177.50
01/30/23	Jeffrey Shaw	Analyzed and reviewed claim reconciliations.	4.30	355.00	1,526.50



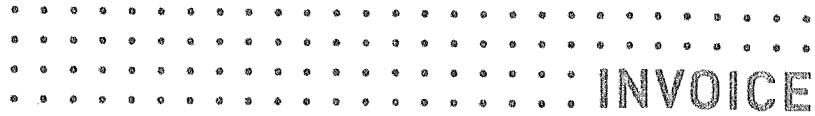
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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/31/23	Jeffrey Shaw	Analyzed, updated and reviewed claim reconciliations.	5.10	355.00	1,810.50
02/02/23	Jeffrey Shaw	Met with Receiver and counsel regarding litigation/claims issues.	2.00	355.00	710.00
02/10/23	Jeffrey Shaw	Discussion with counsel regarding claims issues.	0.60	355.00	213.00
02/14/23	Jeffrey Shaw	Analyzed and updated claims register.	5.90	355.00	2,094.50
03/01/23	Jeffrey Shaw	Emails to counsel regarding claim issues.	0.30	355.00	106.50
03/14/23	Jeffrey Shaw	Analyzed █████ investment activity.	1.50	355.00	532.50
03/21/23	Jeffrey Shaw	Call with counsel regarding claims issues.	0.40	355.00	142.00
03/23/23	Jeffrey Shaw	Analyzed █████ investor activity and support.	3.50	355.00	1,242.50
03/24/23	Jeffrey Shaw	Analyzed █████ investor activity and support.	3.30	355.00	1,171.50
03/27/23	Jeffrey Shaw	Analyzed █████ investor activity and support.	4.90	355.00	1,739.50
03/28/23	Jeffrey Shaw	Analyzed █████ investor activity and support.	5.50	355.00	1,952.50
03/29/23	Jeffrey Shaw	Reviewed investor activity and support.	1.50	355.00	532.50
03/30/23	Jeffrey Shaw	Call with counsel regarding Zion's claims.	0.40	355.00	142.00
03/30/23	Jeffrey Shaw	Analyzed Zion's claims.	2.30	355.00	816.50
<b>Total for Task Code 350</b>			<b>137.60</b>		<b>48,848.00</b>

**Task Code: 500 - Recovery Litigation**

01/06/23	Jeffrey Shaw	Prepared Sagarin declaration narrative.	2.40	355.00	852.00
01/11/23	Jeffrey Shaw	Analyzed Larsen metals transactions and responded to counsel inquiry.	0.90	355.00	319.50
01/11/23	Ray Strong	Followed up regarding status of ongoing claw-back actions.	0.30	400.00	120.00
01/12/23	Jeffrey Shaw	Reviewed litigation issues and deadlines.	0.50	355.00	177.50
01/12/23	Jeffrey Shaw	Call with counsel regarding various litigation matters.	0.50	355.00	177.50

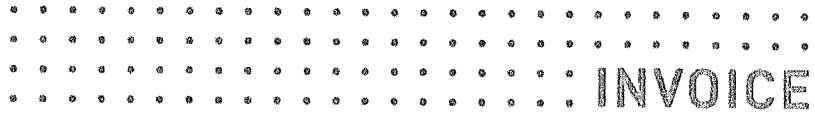


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01/13/23	Jeffrey Shaw	Reviewed Larsen response to discovery requests.	0.70	355.00	248.50
01/17/23	Jeffrey Shaw	Call with counsel regarding Sagarin litigation.	0.30	355.00	106.50
01/17/23	Jeffrey Shaw	Updated Sagarin net winner analysis.	0.30	355.00	106.50
01/17/23	Jeffrey Shaw	Reviewed narrative prepared regarding Sagarin net winner analysis.	0.20	355.00	71.00
01/17/23	Ray Strong	Followed up regarding status of ongoing claw-back actions.	0.30	400.00	120.00
01/30/23	Ray Strong	Analyzed responses regarding Oberhansly tax refund sent by counsel.	0.20	400.00	80.00
01/31/23	Jeffrey Shaw	Analyzed Wells investment activity and responded to counsel inquiry.	1.20	355.00	426.00
02/01/23	Vernon Calder	Prepared for and participated in conference call regarding recovery of federal estate taxes paid by Oberhansly.	0.90	440.00	396.00
02/03/23	Jeffrey Shaw	Follow-up regarding litigation issues.	0.50	355.00	177.50
02/03/23	Jeffrey Shaw	Reviewed litigation scheduling issues.	0.50	355.00	177.50
02/08/23	Jeffrey Shaw	Analyzed Ellingford activity and support per counsel inquiry.	2.90	355.00	1,029.50
02/14/23	Jeffrey Shaw	Emails with counsel regarding Ellingford activity.	0.20	355.00	71.00
02/15/23	Jeffrey Shaw	Prepared for and attended call with counsel regarding Ellingford group.	1.20	355.00	426.00
02/20/23	Jeffrey Shaw	Follow-up regarding litigation issues.	0.30	355.00	106.50
02/23/23	Jeffrey Shaw	Reviewed Howell Summary Judgment Order.	0.80	355.00	284.00
02/27/23	Jeffrey Shaw	Reviewed Howell ruling.	0.30	355.00	106.50
02/27/23	Jeffrey Shaw	Emails regarding Larsen litigation.	0.30	355.00	106.50
02/28/23	Jeffrey Shaw	Call with counsel to discuss Larsen litigation.	0.30	355.00	106.50
03/01/23	Jeffrey Shaw	Analyzed Larsen ability to pay documents.	1.30	355.00	461.50
03/02/23	Jeffrey Shaw	Analyzed Larsen ability to pay documents.	2.90	355.00	1,029.50
03/03/23	Jeffrey Shaw	Reviewed litigation timing and issues.	0.50	355.00	177.50

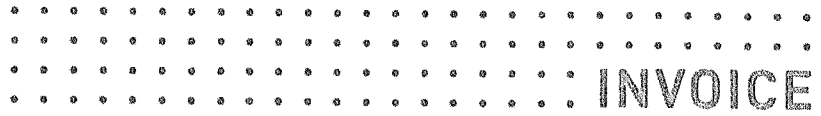


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03/03/23	Jeffrey Shaw	Follow-up regarding litigation issues.	0.20	355.00	71.00
03/03/23	Jeffrey Shaw	Analyzed Larsen activity and ability to pay documents.	4.90	355.00	1,739.50
03/06/23	Jeffrey Shaw	Follow-up regarding litigation issues.	0.20	355.00	71.00
03/06/23	Jeffrey Shaw	Analyzed Larsen account activity and ability to pay documents.	3.20	355.00	1,136.00
03/06/23	Jeffrey Shaw	Call with counsel to discuss Larsen litigation.	1.00	355.00	355.00
03/06/23	Jeffrey Shaw	Reviewed and prepared request in connection with Larsen litigation.	0.80	355.00	284.00
03/07/23	Jeffrey Shaw	Reviewed and prepared additional document request for Larsen litigation.	3.80	355.00	1,349.00
03/09/23	Jeffrey Shaw	Analyzed Sagarin activity and revised schedule.	1.50	355.00	532.50
03/10/23	Jeffrey Shaw	Prepared response to counsel inquiry regarding Sagarin activity.	0.50	355.00	177.50
03/10/23	Jeffrey Shaw	Reviewed investor statements for Wells group.	1.50	355.00	532.50
03/10/23	Jeffrey Shaw	Responded to counsel inquiry regarding litigation filings.	0.40	355.00	142.00
03/10/23	Jeffrey Shaw	Call with counsel regarding Sagarin activity.	0.10	355.00	35.50
03/13/23	Jeffrey Shaw	Reviewed expert disclosures for Percell matter.	0.50	355.00	177.50
03/14/23	Jeffrey Shaw	Responded to counsel email regarding potential settlement.	0.40	355.00	142.00
03/15/23	Jeffrey Shaw	Reviewed and prepared request to metals expert regarding metals values in connection with Sagarin litigation.	0.70	355.00	248.50
03/15/23	Jeffrey Shaw	Analyzed Sagarin activity and support in connection with counsel inquiry.	1.50	355.00	532.50
03/15/23	Jeffrey Shaw	Call with counsel to discuss Sagarin activity and related issues.	0.70	355.00	248.50
03/15/23	Jeffrey Shaw	Reviewed summary schedule and support of Sagarin metals.	0.90	355.00	319.50
03/16/23	Jeffrey Shaw	Analyzed Sagarin activity and support.	1.50	355.00	532.50

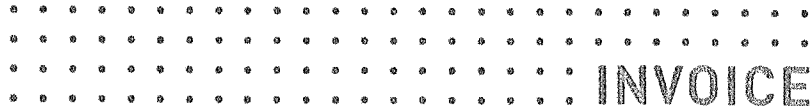




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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/17/23	Jeffrey Shaw	Reviewed and provided proposed revisions to expert disclosures in Percell matter.	1.50	355.00	532.50
03/20/23	Jeffrey Shaw	Reviewed litigation issues.	0.80	355.00	284.00
03/22/23	Jeffrey Shaw	Analyzed Sagarin data and prepared schedule.	2.90	355.00	1,029.50
03/23/23	Jeffrey Shaw	Follow-up regarding clawback actions.	0.20	355.00	71.00
03/23/23	Jeffrey Shaw	Call with counsel regarding litigation issues.	0.70	355.00	248.50
<b>Total for Task Code 500</b>			<b>51.10</b>		<b>18,253.00</b>
<b>Task Code: 600 - Tax Compliance &amp; Analysis</b>					
01/09/23	Leif Larsen	Reviewed tax work required for tax year 2022 and requested information needed.	0.20	355.00	71.00
01/10/23	Jeffrey Shaw	Reviewed 2022 activity and prepared ledger reports for 1099 filings.	0.20	355.00	71.00
01/20/23	Leif Larsen	Analyzed 2022 transactions and prepared required Form(s) 1099.	1.50	355.00	532.50
01/23/23	Vernon Calder	Reviewed 2022 Information tax returns - IRS Form 1099.	0.40	440.00	176.00
01/25/23	Leif Larsen	Cleared review notes related to the 2022 Forms 1099.	0.50	355.00	177.50
01/28/23	Kellee Calder	Prepared 2022 1099 forms for distribution to recipients.	0.10	145.00	14.50
01/31/23	Leif Larsen	Prepared 2022 Forms 1099 for submission to the proper taxing authorities.	0.30	355.00	106.50
02/03/23	Leif Larsen	Analyzed Form 1098-F received from the IRS.	0.40	355.00	142.00
02/03/23	Jeffrey Shaw	Reviewed and researched tax issues.	0.80	355.00	284.00
<b>Total for Task Code 600</b>			<b>4.40</b>		<b>1,575.00</b>
<b>Task Code: 700 - Civil Investigation / AG Inquiries</b>					
03/22/23	Jeffrey Shaw	Call with counsel regarding CFTC request.	0.20	355.00	71.00
03/22/23	Jeffrey Shaw	Discussions and email regarding CFTC request.	0.60	355.00	213.00
<b>Total for Task Code 700</b>			<b>0.80</b>		<b>284.00</b>



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Task Code: 730 - Deposition Preparation</b>					
03/24/23	Jeffrey Shaw	Reviewed Zions proposed questions and BRG expert report.	2.50	355.00	887.50
03/24/23	Jeffrey Shaw	Reviewed and provided expert declaration per counsel request in connection with Zions/Lugli matter.	0.60	355.00	213.00
03/29/23	Jeffrey Shaw	Analyzed Lugli activity and support in connection with expert deposition preparation.	2.50	355.00	887.50
03/29/23	Jeffrey Shaw	Call with counsel regarding expert deposition preparation.	1.80	355.00	639.00
03/29/23	Jeffrey Shaw	Call regarding Lugli activity (Zions).	0.40	355.00	142.00
03/29/23	Ray Strong	Analyzed Declaration filed with the Court in preparation for Zions Bank deposition.	3.10	400.00	1,240.00
03/29/23	Ray Strong	Discussed deposition preparation with BRG team.	0.30	400.00	120.00
03/29/23	Ray Strong	Analyzed Declaration filed with the Court in preparation for Zions Bank deposition.	3.10	400.00	1,240.00
03/30/23	Jeffrey Shaw	Analyzed Lugli activity and support in connection with expert deposition preparation.	5.10	355.00	1,810.50
03/30/23	Ray Strong	Analyzed Declaration filed with the Court in preparation for Zions Bank deposition.	2.40	400.00	960.00
03/31/23	Jeffrey Shaw	Analyzed Lugli activity and support and prepared schedules in connection with expert deposition preparation.	7.50	355.00	2,662.50
03/31/23	Ray Strong	Analyzed Declaration filed with the Court in preparation for Zions Bank deposition.	2.90	400.00	1,160.00
03/31/23	Yuhao Xu	Analyzed and compiled transaction support for Lugli group in connection with deposition preparation.	7.30	125.00	912.50
<b>Total for Task Code 730</b>			<b>39.50</b>		<b>12,874.50</b>



INVOICE

To: Jonathan O. Hafen  
 c/o: Parr Brown Gee & Loveless  
 RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

Page 14 of 14  
 Invoice # 154023  
 Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Task Code: 950 - Fee Application Preparation &amp; Hearing</b>					
01/30/23	Jeffrey Shaw	Reviewed time entries and descriptions for Oct-Dec 2022.	0.90	0.00	N/C
01/31/23	Jeffrey Shaw	Reviewed time entries and descriptions for Oct-Dec 2022.	0.50	0.00	N/C
02/03/23	Jeffrey Shaw	Reviewed and revised time descriptions for Oct-Dec 2022.	0.90	0.00	N/C
02/06/23	Jeffrey Shaw	Follow-up regarding Oct-Dec 2022 bill.	0.30	0.00	N/C
02/06/23	Jeffrey Shaw	Reviewed and prepared final invoice for Oct-Dec 2022 bill.	1.30	0.00	N/C
02/08/23	Jeffrey Shaw	Reviewed and prepared narrative for Oct-Dec time.	1.50	0.00	N/C
02/13/23	Jeffrey Shaw	Reviewed, finalized and submitted narrative for Oct-Dec bill.	0.50	0.00	N/C
03/20/23	Jeffrey Shaw	Reviewed and prepared fee application for review.	0.40	0.00	N/C
<b>Total for Task Code 950</b>			<b>6.30</b>		<b>0.00</b>
<b>Professional Services</b>			<b>380.00</b>		<b>132,410.50</b>

**DETAIL OF EXPENSES**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
<b>Data Research</b>		
03/31/23	TLOxp* (tlo.com)	48.98
<b>Total For Data Research</b>		<b>48.98</b>
<b>Postage</b>		
01/31/23	BRG Misc Clearing - BRG Misc Clearing 01/31/2023 Rust Rare Coins Postage Timekeeper : 09999 - Applicable, Not Invoice #: 013123 Vchr Comment: 013123 Salt Lake City Postage Chargeback	2.40
<b>Total For Postage</b>		<b>2.40</b>
<b>Expenses</b>		<b>51.38</b>

# **EXHIBIT D**

## **EXHIBIT D**

### **SEVENTEENTH FEE APPLICATION**

#### **Time Records of Conflict Receiver and Conflict Receiver's Counsel**

**EXHIBIT D**

**Rust Coin Receivership**  
**Time Detail for Conflicts Receiver**  
**January 1, 2023 to March 31, 2023**

Date	Worker	Hours	Rate	Amount	Description
1/3/2023	WK	0.1	250.00	25.00	Review files; email J. Covey to inquire whether USU made second settlement payment; read confirmation of full payment.
1/23/2023	WK	0.5	250.00	125.00	Review court filings re: Zions Bank class settlement; review settlement agreement exhibit; emails with S. Waterman about extending tolling agreement.
2/21/2023	WK	0.6	250.00	150.00	Read letter from Zions Bank on claim against Jacobson, send email to D. Castleberry and Parr Brown.
2/24/2023	WK	0.7	250.00	175.00	Emails with D. Castleberry re: Zions Bank claim, tolling agreement; send directions (.4); read comments from D. Castleberry, respond; email S. Waterman on tolling (.3).
2/27/2023	WK	0.1	250.00	25.00	Emails with S. Waterman on tolling agreement; read and sign tolling agreement.
3/6/2023	WK	0.7	250.00	175.00	Review Zions Bank motion re: assigning Jacobson claim to Zions Bank; create redline of motion, send to D. Castleberry with comments.
3/7/2023	WK	0.1	250.00	25.00	Review changes by D. Castleberry to Zions Bank motion, respond with approval.
3/10/2023	WK	0.8	250.00	200.00	Call with J. Balls about Zions motion to transfer Jacobson claim (.4); send copy of emails with Receiver; send summary of next steps and developments to S. Waterman, read response (.4).
3/21/2023	WK	0.2	250.00	50.00	Call with J. Balls re: Jacobson claim in class action lawsuit; read Jacobson claim.
3/23/2023	WK	0.5	250.00	125.00	Read draft Jacobson opposition to Zions motion to transfer Jacobson claim, respond to D. Castleberry to instruct Jacobson the Receiver will not oppose intervention (.4); respond to Zions Bank re: Jacobson claim.
3/24/2023	WK	0.1	250.00	25.00	Read Jacobson motion to intervene, send inquiry to D. Castleberry.
3/28/2023	WK	0.8	250.00	200.00	Read notice of claims registry, send to Zions Bank; calendar dates; verify claim information for claims reviewed by conflicts receiver, send comments to J. Balls.
3/30/2023	WK	0.1	250.00	25.00	Read conflicts receiver notice of non-opposition to Jacobson intervention, court order approving intervention.
3/31/2023	WK	0.3	250.00	75.00	Read Jacobson opposition to Zions motion to transfer claim (.1); review files to determine expiration of tolling period for potential claim by conflicts receiver, date for class approval hearing; calendar deadlines (.2).
<b>Total</b>		<b>5.6</b>		<b>1,400.00</b>	



**Submit Via E-Mail Only –  
Do Not Send Hard Copy**

**OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.**

*Attorneys at Law*

Administrative Office  
50 International Drive  
Patewood IV, Suite 200  
Greenville, SC 29615  
Telephone: (864) 241-1801  
Facsimile: (864) 241-1908  
www.ogletreedeakins.com

April 16, 2023

Wayne Klein  
Klein and Associates, PLLC  
P. O. Box 1836  
Salt Lake City, UT 84110  
wklein@kleinutah.com

PERSONAL AND CONFIDENTIAL

Bill No. 90929398  
Client.Matter # 102434.000004

**Re: Rust Rare Coin Receivership**

For professional services rendered through March 31, 2023, in connection with the above-referenced matter as outlined on the attached detailed billing sheets:

Fees .....	\$1,610.00
Expenses .....	\$0.00
<b>Total Due This Bill .....</b>	<b>\$1,610.00</b>

<u>Wire Payments</u>		<u>ACH Payments</u>		<u>Check Payments</u>
TD Bank NA	ABA #: 0311-0126-6	TD Bank	ABA #: 053902197	PO Box 89
300 Delaware Ave	Account #: 7100526246	102 South Main St	Account #: 7100526246	Columbia, SC 29202
Wilmington, Delaware 19801	Swift Code: NRTHUS33XXX	Greenville, SC 29601		

Credit to Ogletree Deakins Nash Smoak & Stewart / Please include bill numbers / Federal Tax ID: 57-1044820 / UEI#: HJ1HV7QNBAM8

**Payable upon receipt.** Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.  
If you would like to receive your bills via e-mail, please notify [Billing2@ogletreedeakins.com](mailto:Billing2@ogletreedeakins.com)



Page 2  
04/16/23  
Bill No. 90929398  
102434.000004-DC

Wayne Klein  
Klein and Associates, PLLC  
P. O. Box 1836  
Salt Lake City, UT 84110  
wklein@kleinutah.com

**Re: Rust Rare Coin Receivership**

For professional services rendered through March 31, 2023

<b>Date</b>	<b>Initials</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
03/03/23	DC	Read email from Steve Waterman regarding motion to transfer claim; read draft motion; identify follow up regarding same.	0.40	140.00
03/06/23	DC	Read email from receiver; read attached edited motion to transfer from receiver; follow up regarding same.	0.50	175.00
03/07/23	DC	Edit and revise motion to transfer claim; draft email to Steve Waterman regarding same.	0.50	175.00
03/07/23	DC	Draft email to receiver regarding motion to transfer claim.	0.20	70.00
03/08/23	DC	Read email from receiver regarding motion to transfer claim.	0.20	70.00
03/08/23	DC	Read email from Steve Waterman regarding motion to transfer.	0.20	70.00
03/09/23	DC	Telephone conference with Steve Waterman regarding case.	0.30	105.00
03/10/23	DC	Read email from Receiver regarding claims procedure.	0.20	70.00
03/13/23	DC	Read email from Karra Porter regarding motion to transfer claim.	0.20	70.00
03/23/23	DC	Read email from Karra Porter regarding opposition; follow up regarding same.	0.40	140.00
03/23/23	DC	Read email from receiver regarding issues in case; read follow up email regarding same.	0.20	70.00
03/23/23	DC	Read filing regarding motion to intervene.	0.30	105.00
03/24/23	DC	Read email from receiver regarding motion to intervene.	0.20	70.00
03/27/23	DC	Draft email to receiver regarding statement of non-opposition to motion to intervene.	0.20	70.00
03/30/23	DC	Draft and file non-opposition to motion to intervene.	0.40	140.00
03/30/23	DC	Read order on motion to intervene.	0.20	70.00
<b>Total Services:</b>			<b>4.60</b>	<b>1,610.00</b>





Page 3  
04/16/23  
Bill No. 90929398  
102434.000004-DC

**Timekeeper Summary**

<b>Timekeeper</b>	<b>Title</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
David C. Castleberry	Shareholder	350.00	4.60	1,610.00

TOTAL FEES	\$1,610.00
TOTAL EXPENSES	\$0.00
TOTAL THIS BILL	\$1,610.00



**Submit Via E-Mail Only –  
Do Not Send Hard Copy**

**OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.**

*Attorneys at Law*

Administrative Office  
50 International Drive  
Patewood IV, Suite 200  
Greenville, SC 29615  
Telephone: (864) 241-1801  
Facsimile: (864) 241-1908  
www.ogletreedeakins.com

March 20, 2023

Wayne Klein  
Klein and Associates, PLLC  
P. O. Box 1836  
Salt Lake City, UT 84110  
wklein@kleinutah.com

PERSONAL AND CONFIDENTIAL

Bill No. 90910807  
Client.Matter # 102434.000004

**Re: Rust Rare Coin Receivership**

For professional services rendered through February 28, 2023, in connection with the above-referenced matter as outlined on the attached detailed billing sheets:

Fees .....	\$840.00
Expenses.....	\$0.00
<b>Total Due This Bill.....</b>	<b>\$840.00</b>

<u>Wire Payments</u>			<u>ACH Payments</u>		<u>Check Payments</u>
TD Bank NA	ABA #:	0311-0126-6	TD Bank	ABA #:	053902197
300 Delaware Ave	Account #:	7100526246	102 South Main St	Account #:	7100526246
Wilmington, Delaware 19801	Swift Code:	NRTHUS33XXX	Greenville, SC 29601		PO Box 89 Columbia, SC 29202

Credit to Ogletree Deakins Nash Smoak & Stewart / Please include bill numbers / Federal Tax ID: 57-1044820 / UEI#: HJ1HV7QNBAM8

**Payable upon receipt.** Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.  
If you would like to receive your bills via e-mail, please notify [Billing2@ogletreedeakins.com](mailto:Billing2@ogletreedeakins.com)



Wayne Klein  
 Klein and Associates, PLLC  
 P. O. Box 1836  
 Salt Lake City, UT 84110  
 wklein@kleinutah.com

**Re: Rust Rare Coin Receivership**

For professional services rendered through February 28, 2023

Date	Initials	Description	Hours	Amount
02/21/23	DC	Read email and correspondence from Steve Waterman; identify follow up needed re same.	0.30	105.00
02/21/23	DC	Read and respond to email from Wayne Klein re issues re request from Zions Bank; read email from Jon Hafen re same.	0.30	105.00
02/22/23	DC	Email exchanges with Steve Waterman re matter.	0.40	140.00
02/23/23	DC	Telephone conference with Steve Waterman; draft email to receiver re same.	0.60	210.00
02/24/23	DC	Telephone conference with Steve Waterman; email exchange with receiver re issues.	0.80	280.00
Total Services:			2.40	840.00

**Timekeeper Summary**

Timekeeper	Title	Rate	Hours	Amount
David C. Castleberry	Shareholder	350.00	2.40	840.00

TOTAL FEES	\$840.00
TOTAL EXPENSES	\$0.00
TOTAL THIS BILL	\$840.00

**EXHIBIT E**

**EXHIBIT E**  
**SEVENTEENTH FEE APPLICATION**  
**Proposed Order**

**EXHIBIT E**

Joseph M.R. Covey (7492) (jcovey@parrbrown.com)  
Jeffery A. Balls (12437) (jballs@parrbrown.com)  
Walter O. Peterson (17300) (wpeterson@parrbrown.com)  
**PARR BROWN GEE & LOVELESS, P.C.**  
101 South 200 East, Suite 700  
Salt Lake City, Utah 84111  
Telephone: (801) 532-7840  
Facsimile: (801) 532-7750

*Attorneys for Jonathan O. Hafen as Receiver*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

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COMMODITY FUTURES TRADING  
COMMISSION, and

STATE OF UTAH DIVISION OF  
SECURITIES, through Attorney General  
Sean D. Reyes

Plaintiffs,

vs.

RUST RARE COIN INC., a Utah corporation,  
GAYLEN DEAN RUST, an individual,  
DENISE GUNDERSON RUST, an individual,  
JOSHUA DANIEL RUST, an individual,

Defendants;

and

ALEESHA RUST FRANKLIN, an individual,  
R LEGACY RACING INC, a Utah  
corporation, R LEGACY ENTERTAINMENT  
LLC, a Utah limited liability company, and R  
LEGACY INVESTMENTS LLC, a Utah  
limited liability company.

Relief Defendants.

**ORDER GRANTING EIGHTEENTH  
INTERIM FEE APPLICATION**

Civil No. 2:18-cv-00892-TC

Judge Tena Campbell

Magistrate Judge Dustin Pead

Before the Court is the eighteenth interim fee application (the “Fee Application”), submitted by Jonathan O. Hafen in his capacity as the Court-Appointed Receiver for Rust Rare Coin Inc., Gaylen Dean Rust, R Legacy Racing Inc., R Legacy Entertainment LLC, R Legacy Investments LLC, Denise Gunderson Rust, and Joshua Daniel Rust (collectively, “Defendants”) seeking approval by the Court for the fees and expenses incurred by the Receiver; the Receiver’s counsel, Parr Brown Gee & Loveless (“Parr Brown”); the Receiver’s accountants, Berkeley Research Group (“BRG”), and the Conflict Receiver, Wayne Klein and his legal counsel, for the period of January 1, 2023, through March 31, 2023 (the “Application Period”), and authorization to pay all allowed fees and expenses from funds of the Receivership Estate.

Based on the Fee Application and accompanying exhibits, and for good cause shown,

**IT IS HEREBY ORDERED** that:

1. The Fee Application is GRANTED; and
2. The Receiver is hereby authorized to pay the fees and expenses incurred by the

Receiver, Parr Brown, BRG, and the Conflict Receiver and his counsel as follows:

- |    |                    |  |
|----|--------------------|--|
| a. | Receiver:          | \$21,627.00 for fees.  |
| b. | Parr Brown:        | \$306,661.50 for fees and<br>\$13,156.15 for out-of-pocket expenses. |
| c. | BRG:               | \$132,410.50 for fees and<br>\$51.38 for out-of-pocket expenses.     |
| d. | Conflict Receiver: | \$3,850.00 for fees  |

3. The Receiver and his professionals will not take any fees or be reimbursed for any expenses from the Receivership Estate until after the Receiver recovers at least three times the amount of the fees for the Estate, at which time the approved fees and expenses shall be paid.

DATED this \_\_\_\_ day of June 2023.

---

Honorable Dustin B. Pead  
United States Magistrate Judge