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Attorneys for Receiver Jonathan O. Hafen

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

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.

**NINETEENTH INTERIM FEE
APPLICATION**

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

Judge Tena Campbell

Magistrate Judge Dustin Pead

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 nineteenth 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 April 1, 2023, through June 30, 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 *Nineteenth Quarterly Status Report*, which includes a status report for the period of April 1, 2023, through June 30, 2023 (the “Nineteenth Status Report”).¹ The Nineteenth Status Report provides a comprehensive description of the services

¹ Docket No. 511 filed July 31, 2023.

performed by the Receiver and his professionals during the Application Period and is incorporated herein by reference.

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 April 1, 2023, through June 30, 2023, the Receiver billed a total of 53.6 hours for services to the Receivership Estate. The Receiver is seeking approval for the payment of fees totaling \$23,852.00. *See* Exhibit A.

b. Parr Brown: From April 1, 2023, through June 30, 2023, Parr Brown billed a total of 1,120 hours for legal services to the Receivership Estate. Parr Brown is seeking

approval for the payment of fees and expenses totaling \$357,915.69 of which \$354,002.50 is for fees and \$3,913.19 is for out-of-pocket expenses. *See* Exhibit B. These amounts include a voluntary write down of \$10,206.50.

c. BRG: From April 1, 2023, through June 30, 2023, BRG billed a total of 350.4 hours providing forensic, tax, and general accounting services to the Receivership Estate. BRG is seeking approval for the payment of fees and expenses totaling \$116,171.63 of which \$116,066.50 is for fees and \$105.13 for out-of-pocket expenses. *See* Exhibit C. These amounts include a voluntary write down of \$1,597.50.

d. Conflict Receiver and counsel: From April 1, 2023, through June 30, 2023, Conflict Receiver, Wayne Klein, and his legal counsel billed a total of 4 hours for services to the Receivership Estate. The Conflict Receiver is seeking approval for the payment of fees totaling \$1,220.00.

11. The amounts requested reflect a total of \$11,804.00 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 scores of investors (the "Claw Back Defendants"). Parr Brown also continued working with the many 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. The Court granted the motion, which has allowed the Receiver to sell lower value music rights “as is” while minimizing administrative expenses to the Receivership Estate.

Exhibit B-5 Claims Administration

24. Parr Brown has submitted to the Court 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 received approximately 115 objections/responses 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 or, (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.

Net Winner/Claims Analysis & Recovery Litigation

27. 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 and has assisted the Receiver and his team to verify accuracy, identify any issues with the claim, and reconcile the amount being claimed by the investor with the books and records of Rust Rare Coin.

28. In connection with requests from the CFTC, BRG reviewed and prepared a summary of all bank and non-bank investment activity which has been identified to date.

29. BRG has continued to be involved in assisting the Receiver to respond to investors and their counsel in providing requested documents and support for its analyses, including replying to discovery requests and subpoenas for documents received from opposing counsel.

30. BRG also continues to perform analysis of cash receipt and disbursement activity, transaction support, investor files, email communications, as well as information received from individual investors through questionnaire responses, claim filings, and document requests for various investors and investor groups in order to identify and determine the amount of funds invested and draws taken by each individual / group. BRG's analysis has been critical in assisting the Receiver 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 reviewed, prepared, and submitted required forms to taxing authorities related to the 2022 tax return. BRG analyzed transactions for the period of January 1, 2022, through December 31, 2022, in order to identify taxable receipts, deductible expenditures, and other reportable activity for the preparation of the 2022 income tax returns. BRG analyzed numerous 2022 cash transactions and researched the proper reporting for the preparation of the 2022 income tax returns of the receivership. BRG prepared additional supporting work papers to be used in the preparation of the 2022 income tax returns of the receivership. BRG prepared the 2022 receivership federal and state income tax returns.

Deposition Preparation

33. BRG experts were requested to prepare for deposition testimony in a related lawsuit outside of, but related to, the Rust Rare Coin receivership. BRG, at the request of the Receiver, 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 eighteen interim fee applications,² all of which were approved by the Court. *See* Dkt. Nos. 153, 203, 247, 275, 293, 339, 367, 382, 413, 416, 428, 434, 442, 461, 481, 488, 494, and 508. This is the Nineteenth 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

² 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 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. The Receiver's Eighteenth Interim Fee Application was filed on June 12, 2023. *See* Dkt. No. 508.

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 the 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.

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 \$23,852.00; Parr Brown's fees in the amount of \$354,002.50 and out-of-pocket expenses of \$3,913.19; BRG's fees in the amount of \$116,066.50 and out-of-pocket expenses of \$105.13; the Conflict Receiver and his counsel's fees in the amount of \$1,220.00; 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 19th day of September 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 via email*

CONFLICT RECEIVER

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

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

/s/ *David C. Castleberry
David. C. Castleberry
Attorney for Conflict Receiver Wayne Klein
**Electronically signed with permission via email*

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the above **NINETEENTH INTERIM FEE APPLICATION** was (1) electronically filed with the Clerk of the Court through the CM/ECF system on September 19, 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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<p>Jessica Stengel FEDERAL PUBLIC DEFENDER DISTRICT OF UTAH 46 W BROADWAY STE 110 SALT LAKE CITY, UT 84101 (801)524-4010 jessica_stengel@fd.org</p>	<p>Megan K. Baker DORSEY & WHITNEY LLP 111 S MAIN ST 21ST FL SALT LAKE CITY, UT 84111-2176 (801)933-7360 baker.megan@dorsey.com</p>
<p>D. Loren Washburn SMITH WASHBURN LLP 8 E BROADWAY STE 320 SALT LAKE CITY, UT 84111 (801)584-1800 lwashburn@smithwashburn.com</p>	<p>Steven T. Waterman DORSEY & WHITNEY LLP 111 S MAIN ST 21ST FL SALT LAKE CITY, UT 84111-2176 (801)933-7360 waterman.steven@dorsey.com</p>
<p>David C. Castleberry OGLETREE DEAKINS NASH SMOAK & STEWART PC 2050 S 1300 E STE 500 SALT LAKE CITY, UT 84106 (801)658-6100 david.castleberry@ogletreedeakins.com</p>	

/s/ Lori Stumpf

EXHIBIT A

EXHIBIT A

NINETEENTH FEE APPLICATION

Receiver's Fees

EXHIBIT A

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

Rust Rare Coin Receiver

July 15, 2023

Invoice: 930009
Client: 177110
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration

Professional Services	\$ 1,557.50
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 1,557.50

PARR BROWN GEE & LOVELESS

Invoice: 930009
 Rust Rare Coin Receiver
 Administration

July 15, 2023
 Client: 177110
 Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/13/23	JOH	Follow up re status of tax matter; Attention to clawback settlement	.50	222.50
4/14/23	JOH	Attention to claims issues; Review documents	.80	356.00
4/17/23	JOH	Attention to tax refund issue; Follow up re clawback settlement	.40	178.00
4/19/23	JOH	Attention to clawback action; Follow up re tax refund process	.70	311.50
4/20/23	JOH	Review email correspondence re tax refund; Review email correspondence with CFTC	.20	89.00
4/24/23	JOH	Monitoring status of wire transfer	.10	44.50
5/18/23	JOH	Analyze claim; Email with legal counsel re same; Attention to clawback action; Attention to asset sale	.80	356.00

TOTAL PROFESSIONAL SERVICES \$ 1,557.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	445.00	3.50	1,557.50
TOTALS		3.50	\$ 1,557.50

TOTAL THIS INVOICE \$ 1,557.50

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

Rust Rare Coin Receiver

July 15, 2023

Invoice: 930009
Client: 177110
Matter: 1

REMITTANCE ADVICE

RE: Administration

BALANCE DUE THIS INVOICE \$ 1,557.50

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 # 930009

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

July 15, 2023

Invoice: 930010
Client: 177110
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Assett Analysis & Recovery

Professional Services	\$ 19,313.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 19,313.00

PARR BROWN GEE & LOVELESS

Invoice: 930010
 Rust Rare Coin Receiver
 Asset Analysis & Recovery

July 15, 2023
 Client: 177110
 Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/04/23	JOH	Attention to clawback action; Review email correspondence re potential property transaction	.90	400.50
4/05/23	JOH	Prepare for meeting with legal counsel; Attend meeting with legal counsel; follow up re potential settlement of two clawback actions; Review documents relating to various claims and related email correspondence	2.10	934.50
4/07/23	JOH	Attention to clawback action; Meeting with legal counsel; Review settlement agreement and related email correspondence	1.00	445.00
4/10/23	JOH	Attention to clawback action; Follow up re tax issue; Review notice of tax refund and related email correspondence	1.10	489.50
4/11/23	JOH	Attention to clawback action and tax refund process	.30	133.50
4/12/23	JOH	Analyze claims process, including timing for potential distribution; Follow up with legal counsel re same; Attention to two clawback actions; Meeting with legal counsel re clawback action and claims status; Attention to sale agreement	1.60	712.00
4/25/23	JOH	Review assessment of conflicts Receiver re various matters; Follow up re same	.40	178.00
4/26/23	JOH	Reviewing email correspondence from legal counsel	.10	44.50
4/28/23	JOH	Review report; Email with legal counsel re same; Attention to claims issues; Review documents; Email with counsel for claimant; Follow up with legal counsel re same	1.30	578.50
5/01/23	JOH	Review documents; Prepare for and participate in meeting with legal counsel; Attention to two clawback actions; Respond to media inquiry	2.90	1,290.50
5/02/23	JOH	Attention to clawback action	.30	133.50
5/04/23	JOH	Respond to media inquiry; Attention to clawback action; Review information relating to third party litigation	1.40	623.00
5/05/23	JOH	Attention to two clawback claims; Review related email correspondence	.60	267.00
5/07/23	JOH	Review information re clawback action; Correspondence by email with legal counsel re clawback action	.40	178.00
5/08/23	JOH	Attention to clawback action; Email with legal counsel re upcoming meeting	.40	178.00
5/09/23	JOH	Attention to clawback action	.20	89.00
5/10/23	JOH	Attention to clawback action; Review pleadings and related email correspondence concerning probate issue; Follow up re same	1.20	534.00
5/15/23	JOH	Calls with victims; Call with legal counsel re same and related matters; Email with counsel for claimant re status of claim; Follow up re same; Review documents; Attention to additional claims matters	2.40	1,068.00
5/16/23	JOH	Email with counsel re claimant; Follow up with legal team re same; Attention to various clawback claims; Meet with legal counsel re status of settlement negotiations in clawback action; Follow up re same; Respond to media request	1.50	667.50

PARR BROWN GEE & LOVELESS

Invoice: 930010
 Rust Rare Coin Receiver
 Asset Analysis & Recovery

July 15, 2023
 Client: 177110
 Matter: 2

Date	Tkpr	Description	Hours	Amount
5/22/23	JOH	Prepare for and participate in meeting with legal counsel re clawback action and related issues; Review documents relating to clawback action; Attention to victim claim; Respond to media inquiry; Attention to probate matter; Calls with victim re same; Follow up with legal counsel re same; Review claims documents	3.20	1,424.00
5/25/23	JOH	Attention to clawback action	.40	178.00
5/26/23	JOH	Prepare for and participate in various meetings concerning multiple clawback claims; Review documents	1.70	756.50
5/30/23	JOH	Attention to clawback and consignment claims and related matters; Email with legal counsel re portions of same; Respond to additional media inquiry	.80	356.00
6/01/23	JOH	Review email correspondence from legal counsel; Attention to multiple clawback actions; Review documents	1.90	845.50
6/02/23	JOH	Attention to two clawback actions; Review documents relating to same	1.30	578.50
6/05/23	JOH	Attention to various clawback actions; Meet with legal counsel re same; Review documents	1.80	801.00
6/06/23	JOH	Attention to three clawback actions; Meet with legal counsel re potential settlement; Email with legal counsel re clawback strategy matter	1.80	801.00
6/07/23	JOH	Attention to two clawback actions; Review documents and related email correspondence	.80	356.00
6/09/23	JOH	Attention to clawback action	.10	44.50
6/12/23	JOH	Review updated expert report and related email correspondence; Attention to clawback claim	.80	356.00
6/14/23	JOH	Review correspondence re hearing	.10	44.50
6/15/23	JOH	Attention to two clawback actions; Email with legal counsel re potential settlement and related matters; Review motion for writ of habeas corpus and related relief and related legal authorities; Follow up with legal counsel re same	1.50	667.50
6/16/23	JOH	Attention to potential settlement of clawback action; Attention to additional clawback claim	.80	356.00
6/19/23	JOH	Review settlement agreement; Email with legal counsel re same; Attention to potential mediation of clawback action; Follow up with legal counsel re same; Review documents; Attention to bankruptcy issues relating to clawback settlement; Follow up with legal counsel re same; Email with legal counsel re initial disclosures in clawback action; Review analysis of bankruptcy matters and related documents	2.60	1,157.00
6/22/23	JOH	Attention to clawback action; Follow up re settlement payment in resolved clawback matter; Review notice of bankruptcy and related email correspondence	.80	356.00
6/23/23	JOH	Attention to clawback action; Email with legal counsel re settlement issue; Follow up re potential mediation of clawback claim	.80	356.00
6/26/23	JOH	Attention to clawback action	.20	89.00
6/27/23	JOH	Attention to bankruptcy issue relating to clawback settlement; Follow up with legal counsel re same	.20	89.00

PARR BROWN GEE & LOVELESS

Invoice: 930010
 Rust Rare Coin Receiver
 Asset Analysis & Recovery

July 15, 2023
 Client: 177110
 Matter: 2

Date	Tkpr	Description	Hours	Amount
6/30/23	JOH	Attention to various clawback actions; Review documents; Follow up re potential mediation of pending action; Attention to banking issue; Attention to damages issues	1.70	756.50

TOTAL PROFESSIONAL SERVICES \$ 19,313.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	445.00	43.40	19,313.00
TOTALS		43.40	\$ 19,313.00

TOTAL THIS INVOICE \$ 19,313.00

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

Rust Rare Coin Receiver

July 15, 2023

Invoice: 930010
Client: 177110
Matter: 2

REMITTANCE ADVICE

RE: Assett Analysis & Recovery

BALANCE DUE THIS INVOICE \$ 19,313.00

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 # 930010

Online Payments: <https://parrbrown.com/payment-portal>
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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

July 15, 2023

Invoice: 930011
Client: 177110
Matter: 3

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Disposition of Assets

Professional Services	\$ 1,513.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 1,513.00

PARR BROWN GEE & LOVELESS

Invoice: 930011
 Rust Rare Coin Receiver
 Disposition of Assets

July 15, 2023
 Client: 177110
 Matter: 3

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
5/11/23	JOH	Attention to asset sale; Attention to two clawback actions	.80	356.00
5/12/23	JOH	Review email correspondence re asset sale; Attention to matter relevant to claim; Review documents re claim	.90	400.50
5/17/23	JOH	Review email from prospective purchaser of asset	.10	44.50
5/19/23	JOH	Review and execute sales document; Email with legal counsel re same; Follow up re claims matters; Review documents re same	1.60	712.00

TOTAL PROFESSIONAL SERVICES \$ 1,513.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	445.00	3.40	1,513.00
TOTALS		3.40	\$ 1,513.00

TOTAL THIS INVOICE \$ 1,513.00

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

July 15, 2023

Rust Rare Coin Receiver

Invoice: 930011
Client: 177110
Matter: 3

REMITTANCE ADVICE

RE: Disposition of Assets

BALANCE DUE THIS INVOICE \$ 1,513.00

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

Rust Rare Coin Receiver

July 15, 2023

Invoice: 930012
Client: 177110
Matter: 5

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Claims Administration

Professional Services	\$ 1,468.50
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 1,468.50

PARR BROWN GEE & LOVELESS

Invoice: 930012
 Rust Rare Coin Receiver
 Claims Administration

July 15, 2023
 Client: 177110
 Matter: 5

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/27/23	JOH	Attention to claims issues	.60	267.00
5/23/23	JOH	Attention to probate matter; Attention to claims issue; Analyze materials relating to potential settlement of clawback and consignment claims	1.30	578.50
5/24/23	JOH	Respond to media inquiry; Attention to claims issues; Review documents relating to clawback claim and related matters	1.40	623.00

TOTAL PROFESSIONAL SERVICES \$ 1,468.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	445.00	3.30	1,468.50
TOTALS		3.30	\$ 1,468.50

TOTAL THIS INVOICE \$ 1,468.50

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

July 15, 2023

Rust Rare Coin Receiver

Invoice: 930012
Client: 177110
Matter: 5

REMITTANCE ADVICE

RE: Claims Administration

BALANCE DUE THIS INVOICE \$ 1,468.50

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E-Check

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

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Routing #: 124001545
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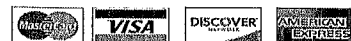


EXHIBIT B

EXHIBIT B

NINETEENTH FEE APPLICATION

Parr Brown's Fees & Expenses

EXHIBIT B

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

Rust Rare Coin Receivership

July 15, 2023

Invoice: 930003
Client: 176430
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration of Receivership Estate

Professional Services	\$ 4,370.50
Total Costs Advanced	<u>\$ 57.03</u>
TOTAL THIS INVOICE	\$ 4,427.53

PARR BROWN GEE & LOVELESS

Invoice: 930003
 Rust Rare Coin Receivership
 Administration of Receivership Estate

July 15, 2023
 Client: 176430
 Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/02/23	SB	Email to the vendor and Lori Stumpf to change contact information for the invoices; Email from Lori Stumpf re new claim files and the handling for same	.50	102.50
4/10/23	WOP	Correspond with Caralee re costs for Howell case	.20	56.00
4/11/23	JMC	Correspond with Jeff Shaw re Rust tax payment	.20	85.00
4/11/23	WOP	Correspond with attorneys re quarterly status report developments; Review docket; Correspond with Kathy re ledger; Review attorney time sheets; Begin draft of quarterly report	3.90	1,092.00
4/11/23	WOP	No Charge - Redact time sheets for fee application	2.20	N/C
4/12/23	WOP	Continue draft of quarterly report; Review ledger; Correspond with Kathy re same	3.30	924.00
4/24/23	WOP	Continue draft of quarterly report	2.30	644.00
4/25/23	JAB	Review quarterly report	.40	148.00
4/25/23	WOP	Meet with Jeff re quarterly report; Revise the same per Jeff's feedback; Prepare exhibits	3.10	868.00
4/27/23	WOP	Review comments to quarterly report; Correspond with BRG and conflict receiver re same	.70	196.00
4/28/23	JMC	Correspond with Jon Hafen re eighteenth quarterly report; Review and finalize report; Coordinate its filing, service and posting	.30	127.50
4/28/23	WOP	No Charge - Correspond with various attorneys re fee application; Correspond with BRG re same; Review time sheets	1.80	N/C
5/01/23	WOP	No Charge - Draft fee application	2.20	N/C
5/11/23	JMC	Correspond with Judge Campbell's law clerk re motion to sell music assets without court approval, status conference hearing and related matters	.30	127.50
5/15/23	JMC	No Charge - Correspond with Walter Peterson re fee application	.10	N/C
5/25/23	WOP	No Charge - Review docket; Correspond with BRG re time sheets; Redact the same	2.20	N/C
5/26/23	WOP	No Charge - Review and revise attorney time sheets in preparation for fee application; Meet with Caralee and Jeff Balls re same; Redact time sheets to remove party names	4.40	N/C
5/29/23	WOP	No Charge - Continue draft of fee application	2.10	N/C
6/01/23	JMC	No Charge - Correspond with Walter Peterson re the fee application	.30	N/C
6/01/23	WOP	No Charge - Continue draft of fee application	3.70	N/C
6/02/23	WOP	No Charge - Review and redact BRG time records for fee application; Continue draft of same	2.40	N/C
6/03/23	WOP	No Charge - Revise fee application; Create all exhibits; Perform final review of attorney time sheets; Correspond with Joe	4.90	N/C
6/05/23	JMC	No Charge - Correspond with Walter Peterson re fee application; Review, analyze and revise application; Correspond with Jon Hafen and the government re the same	4.10	N/C

PARR BROWN GEE & LOVELESS

Invoice: 930003
 Rust Rare Coin Receivership
 Administration of Receivership Estate

July 15, 2023
 Client: 176430
 Matter: 1

Date	Tkpr	Description	Hours	Amount
6/05/23	WOP	No Charge - Call with Joe re fee application; Revise application; Create new exhibits; Draft proposed order; Correspond with Caralee	1.90	N/C
6/08/23	JMC	No Charge - Correspond with Tom Simek and Jennifer Korb re the fee application; Coordinate the filing, service and publishing of the same	.30	N/C
6/09/23	JMC	No Charge - Coordinate filing of fee application	.20	N/C
6/21/23	JMC	No Charge - Correspond with Lamont Richardson re fee application	.40	N/C
6/29/23	JMC	No Charge - Correspond with Kathleen Bates and others re eighteenth fee application	.30	N/C

TOTAL PROFESSIONAL SERVICES**\$ 4,370.50****SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Joseph M R Covey	425.00	.80	340.00
Jeffery A Balls	370.00	.40	148.00
Walter O Peterson	280.00	13.50	3,780.00
Susan Bailey - Paralegal	205.00	.50	102.50
TOTALS		15.20	\$ 4,370.50

COSTS ADVANCED

Date	Description	Amount
4/21/23	Grasshopper.com	19.01
5/21/23	Grasshopper.com	19.01
6/21/23	Grasshopper.com	19.01

TOTAL COSTS ADVANCED**\$ 57.03****TOTAL THIS INVOICE****\$ 4,427.53**

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

Rust Rare Coin Receivership

July 15, 2023

Invoice: 930003
Client: 176430
Matter: 1

REMITTANCE ADVICE

RE: Administration of Receivership Estate

BALANCE DUE THIS INVOICE \$ 4,427.53

Please return this advice with payment to:

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P.O. Box 11019
Salt Lake City, UT 84147

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Salt Lake City, UT 84111-2870
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E-Check

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

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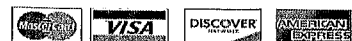
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Account #: 912454114

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

Rust Rare Coin Receivership

July 15, 2023

Invoice: 930004
Client: 176430
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Asset Analysis & Recovery

Professional Services	\$ 254,620.00
Total Costs Advanced	<u>\$ 3,856.16</u>
TOTAL THIS INVOICE	\$ 258,476.16

PARR BROWN GEE & LOVELESS

Invoice: 930004
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

July 15, 2023
 Client: 176430
 Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/03/23	CBB	In Wells group, review and respond to emails from office of vital records and provide and request additional information relating to request for death certificate of Kayleen Roberts	.40	118.00
4/03/23	CBB	In Muir claw back action, review docket deadlines and case filings; Draft and revise first set of discovery requests; Serve discovery requests; Revise first set of discovery requests and re-serve revised version	6.30	1,858.50
4/03/23	CBB	In Wells group claw back, review order from court granting motion to dismiss Laraine Maisey and forward order and narrative discussing case status to Ms. Maisey	.30	88.50
4/04/23	JMC	Correspond with Steve McCardell re Barry Jones	.10	42.50
4/04/23	RGW	Analyze initial disclosure issue and emails re same	.50	225.00
4/05/23	MTH	Conference with Claire McGuire re claw back actions and strategies	.30	121.50
4/05/23	MJB	(Hafen v. Howell) Conference with Jeff Balls; Revise memorandum in opposition to motion to alter or amend judgment	.60	234.00
4/05/23	JAB	Review and revise memorandum in opposition to motion to amend judgment	.90	333.00
4/05/23	CMM	Attorney conference with Robert Wing re Oberhansley claw back and next steps for litigation; Review and respond to email communication re the same; Draft attorney planning meeting summary to file with the court; Communicate with claimant attempting to settle potential claw back action	1.60	416.00
4/05/23	RGW	Conference with Claire McGuire re disclosures and planning meeting; Analyze issues re potential mediation	1.10	495.00
4/06/23	JAB	Telephone conference with Steve Waterman; Review Correspond with Jeff Shaw re status	.50	185.00
4/06/23	CMM	Research royalties being paid by Receivership estate to various music publishing sites; Make appearance in Oberhansley matter; Review email from Robert Wing re the same matter; Draft new scheduling order for the same	1.40	364.00
4/07/23	CMM	Review documents sent by in the Larsen clawback and ensure that the same are added to database	2.80	728.00
4/07/23	CBB	In Wells group, review mail from Office of Vital Records re additional payment and documentation needed from us before fulfilling our request for death certificate and work with staff to provide additional information and re-send request; Review fully executed settlement agreement, work with staff to get check to appropriate location, and provide to Laraine Maisey	.80	236.00
4/07/23	CBB	Review amended scheduling order from counsel for Percell defendants and provide feedback	.30	88.50
4/07/23	CBB	In Percell claw back, review email from opposing counsel re amended scheduling order	.10	29.50

PARR BROWN GEE & LOVELESS

Invoice: 930004
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

July 15, 2023
 Client: 176430
 Matter: 2

Date	Tkpr	Description	Hours	Amount
4/10/23	JMC	Correspond with Jeff Balls re Ray Strong deposition and resolution of lawsuit; Correspond with Ryan Pahnke and Jon Hafen re tax return payment	.40	170.00
4/10/23	RMB	Review Dolores Batalla Settlement Agreement; Communicate with Robb Jones re finalizing Batalla settlement and motion to approve settlement; Prepare motion to approve settlement	.70	283.50
4/10/23	CMM	Review documents sent in Larsen clawback; Communicate with Joseph Covey re the same; Draft response to Larsen re still needed information; Review case file for Oberhansley and claims as well as expert reports re the same; Review settlement agreement for claimant who has stopped making payments; Draft demand letter related to the same	5.80	1,508.00
4/10/23	CBB	In Wells group, discuss internally needed ID, \$30 check, and legal need for request of death certificate for Kayleen Roberts	.30	88.50
4/11/23	JMC	Review and analyze Oberhansly settlement agreement; Correspond with Ryan Pahnke, Jon Hafen, Gary Longmore and others re the same; Correspond with Claire McGuire re Larsen lawsuit	2.30	977.50
4/11/23	RMB	Review docket for Kennedy Barnes matter; Review Kennedy Barnes settlement agreement; Review summary judgment papers for Kennedy Barnes matter and prepare reply memorandum; Review Lugli group produced documents	2.40	972.00
4/11/23	JAB	Review correspondence; Review settlement agreement	.70	259.00
4/11/23	CMM	File notice of appearance in Oberhansley matter; Draft email to opposing counsel in the same; Review discovery requests in Larsen matter from Beneficiary Defendants; Review Reply in Larsen matter and cases referenced in the same; Correspond with Receiver and Joseph Covey re permission to sell musical IP	7.60	1,976.00
4/11/23	CBB	Review and respond to email from Jeff Shaw re expert report dates and potential settlement in Percell matter	.20	59.00
4/12/23	RMB	Communicate with Robb Jones re Dolores Batalla settlement and prepare motion to approve settlement	.80	324.00
4/12/23	CMM	Review documents in Larsen clawback associated with upcoming summary judgement; Research issues related to local rule procedural issue for rule 56(d) relief; Draft summary of arguments for Michael Hoppe re the same; Review discovery responses associated with the Trust and the Beneficiary defendants	6.80	1,768.00
4/12/23	CBB	Discuss proposal to stay discovery deadlines with opposing counsel in Percell matter	.30	88.50
4/13/23	RMB	Prepare Motion to Lift Stay for Kennedy Barnes Group; Communicate with Brad Schmidt re Kennedy Barnes settlement status and motion to lift stay; Review Andreini group related investment documents for settlement with Terri Andreini and Troy Piantes, and default judgments on additional defendants	3.30	1,336.50
4/13/23	MJB	(Hafen v. Howell) Correspond with Steven Waterman (0.1)	.10	39.00

PARR BROWN GEE & LOVELESS

Invoice: 930004
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
4/13/23	CMM	Review documents related to filing a new claw back action and claimants file related to the same; Calls with claimants related to responses and remaining questions; Review emails related to Gregory settlement	3.60	936.00
4/13/23	CMM	Review documents for initial disclosures in the Oberhansley matter; Draft initial disclosures; Communicate with experts re documents needed for initial disclosures; Review reply submitted re motion to transfer claim	3.20	832.00
4/13/23	CBB	Discuss stay of discovery deadlines in Percell matter with expert Jeff Shaw	.10	29.50
4/14/23	RMB	Prepare Motion to Lift Stay for Kennedy Barnes matter; Review Kennedy Barnes investment related documents for ownership and control issue and preparation of reply memorandum; Review Lugli investment related documents as part of preparation of claims analysis and complaint; Review and Analyze proper treatment of Augustin Rico and Adrian Alvarez investment account activity for judgment purposes	4.40	1,782.00
4/14/23	JAB	Correspond with Judson Pitts re settlement; Review motion to suspend case deadlines	.30	111.00
4/14/23	CMM	Review reply submitted by beneficiary defendants and prepare for summary judgement arguments	2.10	546.00
4/14/23	CBB	In Percell matter, draft and revise stipulated motion to stay case deadlines as well as draft of proposed order accompanying motion and provide to opposing counsel	1.70	501.50
4/17/23	RMB	Prepare Motion to Approve Batalla Settlement; Communicate with Robb Jones re Batalla settlement; Review Guadalupe Valencia file and settlement status; Review Lugli file and analyses prepared by BRG; Prepare Reply in Support of Motion for Partial Summary Judgment in Barnes Kennedy case and review Court order re motion to lift stay	3.30	1,336.50
4/17/23	JAB	Review documents; Review motion to approve settlement; Conference with Rodger Burge	1.00	370.00
4/17/23	CMM	Review communications relating to tax return from Ray Quinney; Communicate re the same with accountants and co-counsel	1.10	286.00
4/17/23	CMM	Attorney conference with Michael Hoppe re Nelson clawback; Draft response to Darren Nelson re need for meet and confer and extension of discovery deadlines	1.40	364.00
4/17/23	CBB	In Wells group matter, discuss Kayleen Roberts's death certificate issue with staff	.10	29.50
4/17/23	CBB	Draft, revise, and finalize stipulated motion for stay of discovery deadlines and accompanying proposed order in the Percell claw back action and effectuate filing	.80	236.00
4/17/23	CBB	Discuss with opposing counsel opposing counsel's planned retirement and replacement of counsel for Rosaria and Charlotte Percell in Percell claw back action	.20	59.00
4/17/23	CBB	Compile financial disclosures provided by Rosaria and Charlotte Percell and provide to Jeff Shaw for analysis	.30	88.50

PARR BROWN GEE & LOVELESS

Invoice: 930004
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

July 15, 2023
 Client: 176430
 Matter: 2

Date	Tkpr	Description	Hours	Amount
4/17/23	CBB	Emails to and from counsel for Vanessa Percell re additional documentation of inability to pay	.20	59.00
4/17/23	CBB	In Muir matter, review docket and response deadlines to our discovery requests	.20	59.00
4/18/23	CMM	Communicate with experts and paralegals re need for initial disclosures in the Oberhansley matter; Communicate with experts re new information in the Larsen matter; Attorney conference with Joseph Covey and Michael Hoppe re Larsen matter; Analyze new documents produced in Larsen matter; Identify and communicate with opposing counsel re issues with bates number of documents; Draft response to opposing counsel in Larsen matter	4.80	1,248.00
4/18/23	CBB	Review financial disclosures from Charlotte and Rose Percell, pleadings, and discovery documents; Telephone conference with expert Jeff Shaw discussing financial disclosures from Percells	2.30	678.50
4/18/23	CBB	Review and analyze court's granting of motion to stay and order for joint status report in 90 days, and every 90 days thereafter	.20	59.00
4/18/23	CBB	Discuss Wells group and Muir group claims and active defendants with expert Jeff Shaw	.30	88.50
4/18/23	CY	Attorney conference with Claire McGuire re initial disclosures production; Email correspondence with Susie Bailey re same	.20	31.00
4/18/23	CY	Email correspondence with Claire McGuire re docs needed to add to database; Email correspondence with Shane Bawden from Salt Lake Legal re getting docs added to database; Email correspondence with Claire McGuire re missing bates doc documents (Hafen v Larsen Case)	.20	31.00
4/19/23	JMC	Correspond with counsel for Oberhansley re tax return payment and related issues	.20	85.00
4/19/23	RMB	Review settlement agreement and motion to approve settlement for purposes of revision of said motion	.40	162.00
4/19/23	MTH	Review correspondence re claw back action; Conference with Claire McGuire re various claw back cases; Review information provided by opposing counsel in claw back action; Review and respond to correspondence from opposing counsel	.90	364.50
4/19/23	CMM	Review Larsen and Beneficiary Defendants productions and communications in preparation for summary judgement hearing; Review case law and highlight the same for summary judgment argument	5.80	1,508.00
4/19/23	CBB	Review financial disclosures from Charlotte Percell and Rose Percell, and review notes from call with Jeff Shaw, and draft and send email to counsel for Percells seeking additional financial documents	.30	88.50
4/19/23	CY	Follow up email with Claire McGuire re missing bates doc documents, Research last production of docs we received and verify if they are downloaded to concordance; Email correspondence with Susie Bailey re missing docs (Hafen v Larsen)	1.00	155.00
4/20/23	JMC	Correspond with Kathy Bates and Oberhansly's counsel re tax return issues	.20	85.00

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4/20/23	RMB	Communicate with Robb Jones re Motion to Approve Settlement; Review correspondence with Brandon Jones re Guadalupe Valencia settlement and payments	.60	243.00
4/20/23	MJB	(Hafen v. Howell) Correspond with Joe Covey (0.1)	.10	39.00
4/20/23	CMM	Research case law related to inquiry notice burden and discovery rule issues in preparation for opposition to summary judgement	3.20	832.00
4/20/23	CY	Finish preparing hearing binder for Hafen v Larsen	1.00	155.00
4/20/23	SB	Review database files re Richard Larsen; Email exchange with Crista Yancey and Claire McGuire re same; Email to Bennett Tueller to request replacement link and production materials	1.00	205.00
4/21/23	JMC	Correspond with Gary Longmore and others to coordinate payment of Oberhansly tax return; Correspond with Jeff Balls re contested hearing	.60	255.00
4/21/23	CMM	Draft summary of argument for summary judgement; Gather and highlight all materials needed to prepare for summary judgement argument; Review productions in preparation for summary judgment argument in Larsen	4.20	1,092.00
4/24/23	JMC	Correspond with Michael Hoppe re summary judgment motion	.10	42.50
4/24/23	RMB	Review Guadalupe Valencia settlement agreement and settlement status; Communicate with Brandon Smith re settlement status; Review Mike Johnson file and investment records for settlement analysis and default judgment; Review Larry Milligan file and investment records for default judgment determination	3.80	1,539.00
4/24/23	MTH	Review briefing and case law and prepare outline for oral argument on summary judgment motion in Larsen matter (3.7)	3.70	1,498.50
4/24/23	CMM	Review issues with production from Larsen and communicate with outgoing paralegal Susie Bailey re remaining issues; Review correspondence related to Oberhansley tax return; Research questions from Hoppe re beneficiary defendants reply and productions	6.50	1,690.00
4/24/23	CY	Download remaining docs to T drive; Email correspondence with Shane Baldwin at Salt Lake Legal re getting docs prepared for concordance; Phone conference with Shane Baldwin re bates numbered docs; Email correspondence with Claire McGuire re same; Email correspondence with Angelica Torres re duplicate bates numbers; Download new bates docs to T drive and send to Salt Lake Legal to download (Hafen v Larsen)	1.00	155.00
4/25/23	JMC	Meeting with Michael Hoppe and Claire McGuire re Larsen hearing; Analyze and review clawback issues	.80	340.00
4/25/23	RMB	Review Peggy Hennings, Traci Harmond and Terry Jones investment activity and related records in evaluating default judgments settlements; Review Troy Piantes settlement offer and evaluate supporting documents	3.50	1,417.50
4/25/23	MTH	Prepare for hearing on motion for summary judgment in Larsen matter; Meeting with Joe Covey and Claire McGuire re hearing; Continue preparing outline for oral argument on motion for summary judgment	1.10	445.50

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4/25/23	JAB	Correspond with Matthew Barneck re extension for Taylor matter;	.40	148.00
4/25/23	CMM	Research issues related to upcoming summary judgement hearing requested by Michael Hoppe; Review communications with opposing counsel related to discovery request responses	2.80	728.00
4/25/23	CBB	Review death certificate of Kayleen Roberts (Wells group) provided by the department of vital records and discuss with internal staff re filing in probate action	.30	88.50
4/26/23	RMB	Review docket for Kennedy-Barnes claw back; Review defendant's opposition to motion for partial summary judgment in Kennedy-Barnes matter; Communicate with Robb Jones re Dolores Batalla motion to approve settlement and review same	1.40	567.00
4/26/23	MTH	Prepare for summary judgment hearing; Conference with Claire McGuire re claw back action	1.80	729.00
4/26/23	JAB	Review dismissal documents for North Valley partners lawsuit	.20	74.00
4/26/23	CMM	Research issues requested by Michael Hoppe re procedural issues, concurrent legal remedy doctrine and productions; Draft summary of the same; Attorney with Michael Hoppe and Joseph Covey to discuss issues and arguments for summary judgement hearing	4.80	1,248.00
4/26/23	CBB	Discuss doctrine of laches as it applies to Larson and other claw back actions with Claire McGuire	.40	118.00
4/27/23	JMC	Review and revise clawback settlement agreement	.30	127.50
4/27/23	JMC	Review and revise clawback settlement agreement	.90	382.50
4/27/23	RMB	Communicate with Robb Jones re settlement payments and motion to approve settlement; Review correspondence file with Brad Schmidt, counsel for Kennedy Barnes group; Review Terri Andreini file and correspondence with counsel	.80	324.00
4/27/23	MTH	Prepare for summary judgment hearing; Attend and participate in summary judgment hearing; Conference with Claire McGuire re Larsen case; Review correspondence from claw back defendant re status report; Review draft correspondence to claw back defendant and correspond with Claire McGuire re same	2.90	1,174.50
4/27/23	JAB	Revise settlement agreement for Tyler Thurgood; Email Jared Scott re same; Telephone conference with Ryan Pahnke	2.30	851.00
4/27/23	CMM	Prepare for and attend summary judgment hearing relating to the beneficiary defendants; Communicate with opposing counsel in Oberhansley matter re scheduling and meet and confer; Communicate with Darren Nelson re new scheduling order and other discovery issues	6.10	1,586.00
4/27/23	RGW	Emails re Oberhansly matter	.20	90.00
4/28/23	RMB	Review Terri Andreini correspondence file and analyze collectibility issues	.80	324.00
4/28/23	MTH	Review correspondence with claw back claimant; conference with Claire McGuire re summary judgment ruling; Review summary judgment ruling in Larsen matter	.40	162.00

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4/28/23	MTH	Review and respond to correspondence from beneficiaries counsel in Larsen matter re discovery	.10	40.50
4/28/23	WOP	Call with Joe re investor loan documents; Review and summarize the same	1.30	364.00
4/28/23	CMM	Communicate with claimants re responses and issues with claims; Meet with Jeffery Balls re determinations of the same; File joint status report for Darren Nelson claw back	4.60	1,196.00
4/28/23	CBB	In Wells group, review case file and probate action docket in matter of Kayleen Roberts; Draft and revise proposed statement of information appointment of personal representative; Request notice information and requirements from Amanda Bradley and discuss it internally; Effectuate filing of statement	2.90	855.50
4/28/23	CBB	Review Jeanne Muir docket and discovery deadlines, specifically re when Muir's responses to our discovery requests are due	.20	59.00
4/28/23	CY	Download initial disclosure docs for Mark Oberhansly case	.20	31.00
5/01/23	JMC	Correspond with Jon Hafen re clawback settlement approvals	.10	42.50
5/01/23	RMB	Prepare Second Amended Scheduling Order for Kennedy Barnes claw-back; Communicate with Brad Schmidt re preparation of joint scheduling order; Review Kennedy Barnes depositions in connection with preparation of motion for partial summary judgment; Review Mike Johnson communications and investment related documents	3.40	1,377.00
5/01/23	MTH	Review and respond to correspondence from opposing counsel in claw back action	.10	40.50
5/01/23	JAB	Correspond with Matthew Barneck re Mississippi deposition; Conference with Jonathan Hafen re settlement; Review Thurgood settlement	.60	222.00
5/01/23	WOP	Review correspondence from potential net winner re settlement	.40	112.00
5/01/23	CMM	Communicate with counsel for Bo Oberhansly re meet and confer; Participate in meet and confer; Draft and file summary re meet and confer and proposed order; Review communications with Andrew Collins re discovery requests deadlines in Larsen matter	1.80	468.00
5/01/23	CBB	In Wells claw back action, review and analyze filings of death certificate and application for appointment of receiver and discuss filings and court communications internally	.40	118.00
5/01/23	CBB	In Muir claw back action, review and respond to email from opposing counsel re discovery extension and review case discovery deadlines	.20	59.00
5/01/23	CY	Phone conference with Claire McGuire re attorney planning report; Edit and revise attorney planning report and file (Hafen v Oberhansly)	.50	77.50
5/01/23	CY	Draft stipulated motion to extend scheduling order deadlines (Hafen v Nelson)	.30	46.50
5/01/23	RGW	Review emails re Oberhansly matter	.30	135.00

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5/02/23	RMB	Revise motion to approve Dolores Batalla settlement agreement; Prepare stipulated motion to extend case deadlines for Kennedy Barnes claw-back group; Communicate with Brad Schmidt's office re proposed stipulated motion and second amended scheduling order; Review Guadalupe Valencia correspondence file and settlement agreement; Review Kennedy Barnes group depositions	2.70	1,093.50
5/02/23	JAB	Prepare for oral argument on Howell matter; Review pleadings, statutes, and case law	1.90	703.00
5/02/23	WOP	Review loan records for investor; Calculate total interest paid	2.90	812.00
5/02/23	CMM	Draft extended scheduling order in Nelson claw back and communicate the same; Attorney conference with Robert Wing re Oberhansley claw back; Draft email to opposing counsel in Oberhansley claw back action; Review information from BRG related to Larsen claw back; Update settlement tracking	3.70	962.00
5/02/23	CBB	Review email from paralegal Crista Yancey re access to documents, check access to Dropbox, review additional links and Dropbox folders, and respond to email from Crista.	.30	88.50
5/02/23	CY	Draft order for motion to extend scheduling order deadlines; Prepare initial disclosure documents for production; Email correspondence with Claire McGuire re same (Hafen v Oberhansly)	3.20	496.00
5/03/23	JMC	Correspond with Jeff Balls re upcoming Larsen hearing and related issues; Review Lugli settlement; Correspond with Jeff Balls re the same; Review discovery in other clawback action	2.50	1,062.50
5/03/23	RMB	Review Lugli investment group analysis and flowcharts from BRG; Conference with Jeff Balls re Lugli group analysis from BRG; Review and analyze file documents from Lugli counsel re silver pool investment activity; Evaluate claimed investments for Terri Andreini	3.20	1,296.00
5/03/23	MTH	Review correspondence from opposing counsel re discussions and respond to same; Conference with Claire McGuire re Larsen matter; Conference with Claire McGuire re Nelson matter	.40	162.00
5/03/23	JAB	Conference with Joseph Covey re hearing; Prepare for hearing; Conference with Abbey Farnsworth	2.00	740.00
5/03/23	CMM	Draft initial disclosures for Oberhansley matter; Respond to correspondence from the Court in the same matter; Communicate with expert witnesses re upcoming deposition in Larsen matter	2.90	754.00
5/03/23	CMM	Communicate with opposing counsel re settlement discussions; Compile documents re the same; Draft second set of discovery requests directed at Richard Larsen re Trust disbursements	2.60	676.00
5/03/23	CY	Attorney conference with Claire McGuire re email from courts on filing; Draft motion for scheduling order and proposed order; Edit and revise motion and order; Phone conference with court clerk re filing errors; Attorney conference with Claire McGuire re same (Hafen v Oberhansly)	2.00	310.00
5/04/23	JMC	Correspond with Jeff Balls re clawback action and with Steve Waterman re settlement; Correspond with Michael Hoppe re Larsen deposition	.90	382.50

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5/04/23	RMB	Review Kennedy Barnes group depositions for purposes of preparation of reply memorandum in support of motion for partial summary judgment	2.40	972.00
5/04/23	MTH	Review and evaluate discovery requests to Larsen; Prepare for meeting with opposing counsel in Larsen; Telephone conference with opposing counsel in Larsen; Conference with Joe Covey re Larsen matter	.80	324.00
5/04/23	JAB	Prepare for hearing re Howells; Argue hearing re Howells	2.20	814.00
5/04/23	CMM	Review new credit card and bank statements sent by Larsen; Coordinate meet and confer re the same; Attorney conference with Michael Hoppe; Manage documents sent by Larsen parties; Communicate with Oberhansley opposing counsel; Review materials for settlement communications with claimant counsel; Meet and Confer call with Michael Hoppe, James Tracy, Josh Lee re scheduling deposition and needed information for Rick Larsen; Review communications with counsel representing investor/lender	5.20	1,352.00
5/04/23	CBB	Discuss Muir matter and defendant's ability to repay with counsel	.30	88.50
5/04/23	RGW	Emails with Claire McGuire re Oberhansly	.20	90.00
5/05/23	RMB	Revise stipulated motion to extend case deadlines and proposed Second Amended Order; Review Andreini party docket; Review potential assets of Larry Milligan	1.60	648.00
5/05/23	JAB	Telephone conference with Jared Scott re claims; Review signed settlement agreement	.50	185.00
5/05/23	AWF	Research re community property and enforcement of orders; Conference with Jeff Balls re the same	2.00	660.00
5/05/23	CMM	Review communication from potential clawback defendant re settlement; Draft scheduling order and stipulated motion for extension; Communicate with Darren Nelson re scheduling order; Prepare the same for filing; Review confidential settlement for use in claims registry; Review documents for scheduled deposition of Richard Larsen	4.30	1,118.00
5/05/23	CY	Review motion to extend scheduling orders (Hafen v Nelson)	.40	62.00
5/08/23	RMB	Revise motion to extend case deadlines and proposed Second Amended Scheduling Order for Kennedy Barnes matter; Preparation of Reply memorandum in support of motion for partial summary judgment; Review Lugli investor group produced documents and tolling agreement	3.20	1,296.00
5/08/23	MTH	Review schedule order and new dates for Darren Nelson matter	.10	40.50
5/08/23	CMM	Review settlement with potential claw back defendants and communicate with Jeffery Balls and Joseph Covey re the same	1.20	312.00
5/08/23	CBB	In Wells Group, review emails from staff re clerks need of additional addresses for additional notices; Perform people searches; Request assistance on people searches from paralegal Jen Luft; Discuss filing of addresses with Madi Morgan	1.30	383.50
5/08/23	CBB	In Muir matter, review and analyze Muir's first supplemental disclosure and accompanying documents; discuss with staff and forward to Jeff Shaw	.40	118.00

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5/08/23	JL	Person report for J. Roberts, S. Campbell, C. Satterthwaite and C. Campbell	1.80	342.00
5/09/23	RMB	Review Miriam Martinez and Luisa Marquez file documents for settlement purposes; Review Larry Milligan file and investment related documents; Review Guadalupe Valencia settlement agreement	1.30	526.50
5/09/23	JAB	Conference with Judson Pitts; Draft motion to amend scheduling order	.50	185.00
5/09/23	CMM	Review documents submitted by potential claw back defendant in an effort to reach settlement; Review and prepare documents for production with initial disclosures in Oberhansley matter	5.60	1,456.00
5/09/23	CBB	In Muir matter, review and analyze supplemental disclosure from Muir and work with staff to organize and file disclosures	.30	88.50
5/09/23	CY	Prepare production of documents; Attorney conference with Claire McGuire re same; Organize production of documents (Hafen v Oberhansly)	3.00	465.00
5/10/23	JMC	Correspond with Claire McGuire and Michael Hoppe re Rick Larsen deposition; Begin drafting deposition outline; Review other clawback information	2.00	850.00
5/10/23	RMB	Review depositions of Kennedy Barnes group; Prepare Reply in Support of Motion for Partial Summary Judgment; Review Troy Piantes and Terri Andreini investment files for settlement planning; Review incoming correspondence from Brandon Smith re Guadalupe Valencia settlement	4.50	1,822.50
5/10/23	MTH	Review correspondence from Joe Covey re deposition of Rick Larsen; Correspond with opposing counsel in Larsen matter re deposition	.30	121.50
5/10/23	MTH	Review and respond to correspondence from James Tracy re deposition of Rick Larsen	.10	40.50
5/10/23	MJB	(Hafen v. Howell) Conference with Jeff Balls (0.2)	.20	78.00
5/10/23	CMM	Attorney conference with Joseph Covey re deposition of Rick Larsen; Review communications with opposing counsel re the same; Review documents from BRG for draft of deposition outline; Draft deposition outline	4.80	1,248.00
5/10/23	CBB	In Wells matter, review and analyze minute entry from the court re notice of application being sent to heirs of Kayleen Roberts estate; Provide email update to Wells group team; Request that deadlines for responses be entered into calendars from calendaring	.50	147.50
5/10/23	TMM	Review Guyon spreadsheets and filings.	3.50	1,575.00
5/11/23	RMB	Review depositions of Kennedy Barnes defendants; Prepare Reply in Support of Motion for Partial Summary Judgment	4.40	1,782.00
5/11/23	MTH	Review and respond to correspondence from opposing counsel re deposition in Larsen matter and correspond with Joe Covey re same	.10	40.50
5/11/23	WOP	Review and analyze Jones loan transactions	3.20	896.00
5/11/23	CMM	Attorney conference with Joseph Covey re entry of musical IP order and motion; Communicate with opposing counsel re deposition of Rick Larsen; Communicate with opposing counsel re discovery issues; Review Larsen documents for deposition outline	1.80	468.00

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5/11/23	CMM	Update research for inquiry notice issues related to secure creditors; Conference with summer associate related to the same; Prepare for deposition of Rick Larsen; Review response issues to review with Receiver related to claw backs and claims; Communicate with opposing counsel in Larsen claw back re deposition of Richard Larsen and bifurcation of the same; Draft initial disclosures in the Oberhansley matter; Prepare documents to accompany the same; Produce initial disclosures to Oberhansley; Attorney conference with Joseph Covey related to motion for authority to dispose of intellectual property rights; Review correspondence with music purchasers re the same	6.80	1,768.00
5/11/23	CY	Prepare initial disclosures; Draft initial disclosures (Hafen v Oberhansly)	2.00	310.00
5/11/23	RGW	Analyze issues re initial disclosures and potential for mediation; Review documents re same	1.50	675.00
5/12/23	RMB	Prepare Reply in Support of Motion for Partial Summary Judgment in Kennedy Barnes matter	6.20	2,511.00
5/12/23	MTH	Review correspondence and information from counsel for Rick Larsen and respond to same	.10	40.50
5/12/23	JAB	Conference with Joseph Covey; Conference with clerk re status of cases; Conference with Claire McGuire re Oberhansly	.60	222.00
5/12/23	WOP	Continue review and analysis of Jones loan transactions; Calculate interest paid under each loan; Call with Joe re same; Draft summary of loan transactions	5.20	1,456.00
5/12/23	CMM	Review new documents provided by Richard Larsen including bank statements in preparation for deposition of the same; Draft new section of deposition outline related to the same; Review letters from investors attorney related to secured loans and consigned items; Review documents and receipts related to schedule of allegedly consigned items in preparation for informal mediation	5.30	1,378.00
5/12/23	CMM	Draft and file notice of deposition for Richard Larsen; Prepare documents for deposition	1.10	286.00
5/12/23	CY	Draft notice of deposition and subpoena for Richard Larsen	.40	62.00
5/12/23	SD	Research at Davis County Recorder's office re abstract and chain of title	.70	143.50
5/13/23	WOP	Continue analysis of Jones loan payments; Correspond with BRG re same; Review silver account statements and agreements	2.70	756.00
5/15/23	RMB	Prepare and finalize reply in support of Motion for Partial Summary Judgment for Kennedy Barnes claw-back; Prepare appendix for Kennedy Barnes reply in support of motion for partial summary judgment; Review second amended scheduling order for Kennedy Barnes claw-back action; Further analysis of Terri Andreini claimed evidence for investments	4.30	1,741.50
5/15/23	JAB	Review reply memorandum for Barnes; Conference with Rodger Burge re same	1.30	481.00
5/15/23	WOP	Review previous research related to transfer of liens to related parties; Prepare for meeting with Joe, Claire and Jeff	2.20	616.00

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5/15/23	WOP	Attend meeting re Jones transactions with Joe, Claire and Jeff; Research inquiry notice and transfer of liens to affiliates	3.80	1,064.00
5/15/23	CMM	Prepare for and attend meeting with Joseph Covey, Walter Peterson; Jeffery Balls and Jeff Shaw re upcoming investor meeting and potential settlement offer re the same; Follow up research related to investors consigned items and standard for common law consignment; Attorney conference with Joseph Covey re potential settlement	3.60	936.00
5/15/23	RGW	Review and revise Guyon complaint; Call with Tom Melton re same	1.60	720.00
5/15/23	TMM	Revise Guyon complaint	5.50	2,475.00
5/16/23	RMB	Review Guadalupe Valencia settlement for installment payment schedule; Revise motion to approve settlement for Dolores Batalla; Assess default judgments for remaining Andreini and Rico defendants	1.60	648.00
5/16/23	MTH	Review and respond to correspondence from Jeff Shaw re Darren Nelson	.10	40.50
5/16/23	WOP	Call with Joe re Jones transactions; Research inquiry notice with respect to secured liens and transfers	1.80	504.00
5/16/23	CMM	Review and prepare documents for deposition of Richard Larsen; Attorney conference with Joseph Covey re the same	3.00	780.00
5/16/23	CMM	Review draft of settlement letter with investor; Revise the same; Review documents related to consigned items	2.30	598.00
5/16/23	EL	Meet with Claire McGuire to discuss research project re Rust Rare Coin receivership	.40	96.00
5/16/23	TMM	Revise Guyon complaint	3.20	1,440.00
5/17/23	JMC	Correspond with Claire McGuire re clawback issues and settlement	.20	85.00
5/17/23	RMB	Review Troy Piantes settlement offer; Review Troy Piantes correspondence file and related documents; Analyze issues raised by Troy Piantes re investment and settlement amount; Review notice from court re Kennedy-Barnes motion for partial summary judgment; Review local rules and bench rules for summary judgment motions; Prepare response and counteroffer to Troy Piantes with analysis of investment related activity and amount owed	5.20	2,106.00
5/17/23	MTH	Review correspondence from Claire McGuire re deposition; Review deposition notice and correspond with Claire McGuire and Joe Covey re deposition of Rick Larsen	.20	81.00
5/17/23	WOP	Analyze Jones silver rollover accounts; Meet with Jeff re same; Update loan matrix re same; Draft summary of findings for Joe	4.80	1,344.00
5/17/23	CMM	Research investor documents in preparation for a mediation with investor; Update research related to inquiry notice as related to secured lenders; Draft and file notice of deposition; Draft financial deposition outline and prepare exhibits for the same; Communicate with expert re Darren Nelson expert reports	5.70	1,482.00
5/17/23	EL	Research re effect of inquiry notice of a secured creditor	2.20	528.00
5/18/23	JMC	Correspond with Jeff Shaw re Bary Jones issues; Review and analyze Bary Jones consignment issues	.90	382.50

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5/18/23	RMB	Further analysis of Troy Piantes investment activity and recent settlement offer, including prior correspondence and documentation from BRG; Further analysis of Terri Andreini claimed investments and review potential assets for collection	3.60	1,458.00
5/18/23	JAB	Telephone conference with Steve Waterman; Correspond with Chance Thomas re music rights	.60	222.00
5/18/23	WOP	Continue review of Jones silver transaction statements and secured liens	2.70	756.00
5/18/23	CMM	Prepare for financial deposition of Richard Larsen; Attorney conference with Joseph Covey re the same; Prepare documents for deposition; Communicate with opposing counsel re missing documents	3.80	988.00
5/18/23	CMM	Review research from Eric Love; Attorney conference with Eric Love re subjugation of claim and treatment of a secured claim	1.10	286.00
5/18/23	EL	Research re effect of a secured creditor's inquiry notice; Draft informal memo re secured creditor's inquiry notice	7.20	1,728.00
5/19/23	JMC	Review and analyze consignment items, loan documents and agreement, and investors statements of Bary Jones in preparation for meeting; Review research re inquiry notice	7.10	3,017.50
5/19/23	JAB	Correspond with Jonathan Hafen re conveyance of music rights	.10	37.00
5/19/23	WOP	Call with Joe re Jones payments; Review and revise loan tracker	1.70	476.00
5/19/23	EL	Draft memo re effect of inquiry notice on secured creditor	2.50	600.00
5/21/23	WOP	Research indirect benefit rule; Review prior research done on related topic	4.80	1,344.00
5/22/23	JMC	Review and analyze Bary Jones loan, consignment and investment activity; Review documents related to the same; Review research on inquiry notice and other legal issues; Correspond with Walter Peterson and Claire McGuire re loan and investment issues	10.00	4,250.00
5/22/23	RMB	Further review of Miriam Martinez, Luisa Marquez, Larry Milligan and Mike Johnson investment claw-back files for purposes of settlement and entry of default judgment; Prepare Terri Andreini settlement offer	2.40	972.00
5/22/23	MTH	Review and respond to correspondence from Claire McGuire re Darren Nelson discovery	.10	40.50
5/22/23	WOP	Meet with Jones team to discuss strategy; Meet with team and Jon Hafen re same; Meet with Joe re trust deed on huge studios; Do follow up research on loan payments; Update loan summary	6.80	1,904.00
5/22/23	WOP	Call with Joe re loan analysis; Review calculations provided by counsel re Ohio mortgage; Create summary of same; Correspond with team re same	2.20	616.00
5/22/23	CMM	Review loan summary sent by Walter Peterson; Draft and send research summary related to possible investor settlement; Review investment summary from Jeff Shaw related to potential investor settlement; Review and analyze new letter from investor and lender's counsel re questions and updates; Review Guyon complaint and tolling agreement; Meet with Jonathan Hafen and Joseph Covey re investor settlement proposal and determination on various claims and responses	7.20	1,872.00

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5/22/23	CMM	Communicate with Darren Nelson re deposition dates and production of documents; Attorney conference with Michael Hoppe re the same	.60	156.00
5/22/23	CBB	Review and respond to emails from Jon Hafen re correspondence with Bruce Roberts, surviving spouse of Kayleen Roberts in the Wells claw back action; Review past correspondence with Roberts family; Call with Bruce Roberts and discuss status of case and needed financial information	1.50	442.50
5/22/23	CBB	Report to litigation team re call with Bruce Roberts	.20	59.00
5/23/23	JMC	Review and analyze Bary Jones documents, including loans, consignments and investments; Meet with Bary Jones, Steve McCardell, Jeff Balls and others re all Bary Jones issues; Draft correspondence to Jon Hafen and others re meeting and negotiations; Review case law on inquiry notice and other legal issues; Correspond with Claire McGuire re Larsen deposition and documents	11.40	4,845.00
5/23/23	WOP	Prepare for meeting with Jones; Attend meeting; Meet with Joe, Jeff Balls and Jeff Shaw re strategy; Revise loan summary; Correspond with counsel re same	7.20	2,016.00
5/23/23	CMM	Prepare for and attend informal mediations with investor, Joseph Covey, Walter Peterson, Jeff Shaw, Jeffery Balls, and investors counsel; Review draft of settlement proposal with investor; Revise the same	6.90	1,794.00
5/23/23	CBB	In Wells group collection matter, review notes from call with Bruce Roberts, surviving spouse of Kayleen Roberts, and draft and send email re needed financial disclosures	.40	118.00
5/23/23	CBB	Discuss need for stay in probate action internally and request info from court	.20	59.00
5/23/23	RGW	Emails re Oberhansly initial disclosure failure; Emails re potential mediation	.90	405.00
5/24/23	JMC	Review and analyze financial information for Larsen deposition; Review and revise settlement proposal for clawback action; Correspond with Walter Peterson, Jeff Balls, Jeff Shaw and Claire McGuire re same	5.40	2,295.00
5/24/23	RMB	Communicate with Tony Napolitano re Lugli investment group claw-back status and KCB investment related records; Review Lugli group investment records; Review correspondence file and tolling agreement for KCB Investments; Review Dolores Batalla settlement agreement; Analyze Troy Piantes claimed investments for purposes of settlement	2.30	931.50
5/24/23	JAB	Review correspondence from Anthony Napolitano; Conference with Rodger Burge	.30	111.00
5/24/23	WOP	Review Jones settlement proposal; Call with Joe re same; Revise loan analysis; Review loan documents; Draft summary of new findings	6.20	1,736.00

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5/24/23	CMM	Review new analysis from Walter Peterson re secured debt treatment for investor and lender; Draft response to the same; Review financial documents in preparation for deposition of Richard Larsen; Communicate with other net winner re settlement and possible sale of land; Review receipts for consigned items and communicate with paralegal Crista Yancey re collecting documents; Communicate with investor counsel re additional documents needed; Review credit card statements from Richard Larsen	6.40	1,664.00
5/24/23	CBB	In Muir matter, draft and revise responses to Muir's second set of discovery requests; Email Jeff Shaw re questions about Muir's contributions	2.10	619.50
5/24/23	CY	Pull documents for Claire McGuire (Larsen)	.50	77.50
5/24/23	CY	Gather documents for Claire McGuire (Bary Jones)	.50	77.50
5/25/23	JMC	Prepare for and analyze documents related to Rick Larsen; Review and analyze financials and discovery responses; Correspond with Claire McGuire and Jeff Shaw re financials and related issues; Review and revise settlement offer re Bary Jones	11.40	4,845.00
5/25/23	RMB	Review Kennedy-Barnes summary judgment papers; Review Dolores Batalla verified financial information for preparation of motion to approve settlement	1.60	648.00
5/25/23	JAB	Review correspondence re settlements; Conference with Joseph Covey; Research joint ownership	.90	333.00
5/25/23	WOP	Review research re transfer of secured lien; Update loan transaction spreadsheet; Correspond with Claire re same	1.10	308.00
5/25/23	CMM	Attorney conference with Joseph Covey re financial deposition of Richard Larsen; Review documents related to deposition on financial matters; Review discovery requests responses by Richard Larsen; Communicate with opposing counsel and paralegals re missing exhibits; Update deposition outline and prepare exhibits	7.80	2,028.00
5/25/23	CBB	Discuss Larson matter and deposition with Claire McGuire and Joe Covey	.50	147.50
5/25/23	DW	Meet with Claire McGuire re complaint-drafting strategy	.30	72.00
5/25/23	CY	Gather documents for Claire McGuire; Email correspondence with Claire McGuire re same (Bary Jones)	.90	139.50
5/26/23	JMC	Prepare for and take deposition of Rick Larsen; Correspond with Claire McGuire, Jon Hafen, Michael Hoppe and Jeff Shaw re the same; Draft proposed settlement offer; Review and revise Bary Jones settlement; Correspond with Jon Hafen and others re the same	9.60	4,080.00
5/26/23	RMB	Review Andreini file and status of Troy Piantes settlement; Review Miriam Martinez and Luisa Marquez notes and claw-back file for purposes of settlement negotiations	1.60	648.00
5/26/23	MTH	Meeting with Jon Hafen and team re Rick Larsen and case plan	.60	243.00
5/26/23	WOP	Call with Joe re investor loan payments; Revise spreadsheet re same	2.10	588.00

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5/26/23	CMM	Prepare for and attend financial deposition of Richard Larsen; Prepare exhibits for the same; Meet with the Receiver, Michael Hoppe, Joseph Covey and Jeff Shaw re content of deposition and potential settlement offer; Review settlement offer letter drafted by Joseph Covey	8.20	2,132.00
5/26/23	CBB	In Muir matter, discuss potential settlement and extension of discovery deadlines with opposing counsel; Review draft discovery responses and emails to Jeff Shaw; Discuss case status and strategy with Claire McGuire	.60	177.00
5/26/23	DW	Review and analyze existing documents provided in the Ault matter; Email correspondence with Claire McGuire re drafting of complaint	1.30	312.00
5/30/23	JMC	Correspond with Michael Hoppe and Jeff Shaw re Rick Larsen settlement	.20	85.00
5/30/23	MTH	Review correspondence from Jeff Shaw re Larsen matter	.10	40.50
5/30/23	JAB	Correspond with Matthew Barneck re deposition	.20	74.00
5/30/23	CBB	Review email from Jeff Shaw re document in Muir	.10	29.50
5/30/23	DW	Email correspondence with Claire McGuire re drafting of complaint; Review email correspondence from the Aults re the settlement agreement; Telephone conference with Claire McGuire re drafting of complaint	1.60	384.00
5/30/23	CY	Download tax returns to T drive; Email correspondence with Claire McGuire and Michael Hoppe re missing docs	.20	31.00
5/31/23	JMC	Correspond with Liz Blaylock and Jeff Balls re Ron Wells matter	.20	85.00
5/31/23	CMM	Draft Guyon letter ending tolling agreement; Communicate with Tom Melton re the same; Review settlement letter to Richard Larsen and revise the same; Attorney conference with Chaunceton Bird related to Muir claw back and documents for response to discovery requests	2.90	754.00
5/31/23	CBB	In Percell claw back case, review additional financial disclosures provided by counsel for Rosaria Percell and Charlotte Percell; Respond to email from opposing counsel; Provide additional documents to Jeff Shaw and discuss case status with Jeff Shaw	.50	147.50
5/31/23	CBB	Review email from Jeff Shaw re certain missing document; Discuss document and document location with Claire McGuire; Provide document to Jeff Shaw; Check discovery deadlines and draft responses	.40	118.00
5/31/23	CBB	In Wells claw back action, review and respond to email from staff re probate action	.10	29.50
5/31/23	DW	Meet with Claire McGuire re drafting of Complaint against the Aults	.40	96.00
6/01/23	JMC	Draft settlement offer to Bary Jones and Rick Larsen; Review and analyze claims, payments and other issues; Correspond with James Tracy, Steve McCardell and others re the same	3.40	1,445.00
6/01/23	CMM	Draft letter to end tolling agreement with investor and affiliated entities; Call with Joseph Covey to discuss settlement communications and upcoming litigation strategy	1.40	364.00
6/01/23	CMM	Review and analyze settlement communication in Larsen case; Attorney conference with Joseph Covey re the same	1.20	312.00

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6/01/23	CMM	Communicate with Tom Melton and Robert Wing re ending tolling agreement with Guyon; Revise letter re the same	.40	104.00
6/01/23	TMM	Review termination of stay letter; Emails re same	1.30	585.00
6/02/23	JMC	Correspond with Michael Hoppe re Larsen deposition and related matters; Correspond with Steve McCardell re Bary Jones settlement; Review and analyze consignment schedules	2.00	850.00
6/02/23	MTH	Review and respond to correspondence from Joe Covey re settlement proposal; Review and respond to correspondence from opposing counsel in Larsen matter; Correspond with Claire McGuire re discovery issues	.50	202.50
6/02/23	CMM	Review verified discovery responses per receiver's second set of requests sent by Larsen; Communicate with Michael Hoppe and Joseph Covey re the same; Review settlement communication and resulting questions from possible claw back defendant related to possible consigned items	3.60	936.00
6/02/23	CBB	Review email from Jeff Shaw; Review records in Percell and Muir matters; Call with Jeff Shaw re Percells and Muir	.90	265.50
6/02/23	DW	Review filings to draft Ault Complaint	.20	48.00
6/05/23	JMC	Correspond with Walter Peterson and Jeff Balls re clawback actions	.30	127.50
6/05/23	MTH	Review discovery responses from Larsen (.1)	.10	40.50
6/05/23	JAB	Review correspondence; Review information for deposition of Taylor; Email Desi Potts re deposition; Email Matthew Barneck; Review deposition transcripts; Conference with Joseph Covey	3.30	1,221.00
6/05/23	CMM	Review Larsen deposition transcript; Research re marital property issue; Review and track deposits as per settlement agreements; Communicate with potential claw back defendant re sale of property to fulfill settlement obligation; Meet with Eric Love to discuss research re treatment of secured loans in receivership context and inquiry notice interplay with the same	5.40	1,404.00
6/05/23	CBB	In Percell group claw back, review case files and notes from call with Jeff Shaw and discuss matter and recommendations with Jon Hafen	.40	118.00
6/05/23	CY	Download Richard Larsen deposition to T drive	.20	31.00
6/06/23	MTH	Review discovery requests from Beneficiaries to Larsen	.10	40.50
6/06/23	CMM	Review communications to opposing counsel in Oberhansly matter; Communicate with Robert Wing re the same; Review documents related to Oberhansly matter and analysis provided by expert accountants re the same; Serve ending of tolling agreement per certified mail; Review beneficiary defendants third set of discovery requests; Attorney conference with Michael Hoppe re the same; Review final settlement communication with Percell defendants	3.10	806.00
6/06/23	CBB	In Muir matter, continue revising and finalizing response to Muir's second set of discovery requests and discuss the same with Jeff Shaw	4.50	1,327.50

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6/06/23	CBB	In Percell matter, review email from Jon Hafen re acceptance of offer of settlement from Rosaria Percell and Charlotte Percell; Review email correspondence and settlement offers from Percells; Email counsel for Rosaria and Charlotte and accept offer of settlement	.40	118.00
6/06/23	RGW	Address Oberhansly document issue and effect on mediation	.90	405.00
6/07/23	JMC	Correspond with Michael Hoppe re bankruptcy filing of clawback defendant	.20	85.00
6/07/23	MTH	Conference with Claire McGuire re discovery in Darren Nelson matter; Conference with Claire McGuire re Larsen case; Review and respond to correspondence from Beneficiaries counsel in Larsen matter; Review correspondence from bankruptcy counsel for Darren Nelson; Correspond with Joe Covey and Claire McGuire re same; Conference with Claire McGuire re Darren Nelson and Rick Larsen matters	1.30	526.50
6/07/23	WOP	Review settlement offer; Review loan documents; Call with Joe re same	1.60	448.00
6/07/23	CMM	Communicate with opposing counsel for beneficiary defendants re upcoming meet and confer conference; Attorney conference with Michael Hoppe re upcoming discovery deadlines in Larsen matter and possibility of settlement; Review Larsen's responses to discovery requests and accompanying documents; Communicate with opposing counsel in Oberhansly matter re need to meet and confer and possible mediation; Review communication with bankruptcy counsel retained by Darren Nelson to stay litigation; Communicate with Michael Hoppe and Joseph Covey re the same; Review communication from beneficiary defendants counsel re deficiency of responses from Larsen; Review research memo from Eric Love re updated case law for inquiry notice; Review opposing counsel's questions re settlement offer for potential claw back defendant	5.80	1,508.00
6/07/23	CBB	Draft and revise responses to Muir's second set of written discovery requests; Discuss requests on call with Jeff Shaw; Revise responses; Finalize responses; Provide responses to opposing counsel and answer questions from James Tracy re amount receiver believes Muir contributed to Ponzi scheme	7.30	2,153.50
6/07/23	RGW	Email to opposing counsel	.20	90.00
6/08/23	JMC	Correspond with James Tracy re various clawback discovery issues; Correspond with Steve McCardell re clawback settlement issues	1.10	467.50
6/08/23	MTH	Meeting with opposing counsel in Larsen matter (beneficiaries); Conference with Claire McGuire re case issues in Larsen matter	.50	202.50
6/08/23	JAB	Email Ryan Pahnke re settlement; Telephone conference with investor; Review information re clawbacks; Email Jeff Shaw	2.00	740.00
6/08/23	JAB	Telephone conference with investor	.30	111.00
6/08/23	WOP	Review correspondence re settlement offer; Correspond with Joe re same	.40	112.00

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6/08/23	CMM	Meet and confer call wit counsel for beneficiary defendants and Michael Hoppe re change in attorney and need for extension of rule 56(d) stay; Draft stipulated motion and order; Communicate with Michael Hoppe re the same	2.60	676.00
6/08/23	CMM	Attorney conference with Michael Hoppe re Darren Nelson litigation and bankruptcy implications; Communicate with Joseph Covey re the same	.50	130.00
6/08/23	CMM	Attorney conference with Chaunceton Bird re responses to discovery requests in Muir claw back; Research documents for the same	.80	208.00
6/08/23	CBB	In Wells matter, review information sent and received to and from Kayleen's widower and send follow up email requesting financial disclosures	.30	88.50
6/08/23	CBB	In Muir matter, communicate via email with opposing counsel James Tracy and Josh Lee re disclosures, document interpretation, proposed meeting to review evidence, and status of claim; discuss communications internally and with Jeff Shaw on phone call	1.30	383.50
6/08/23	CBB	In Muir matter, track down two documents requested from opposing counsel, discuss interpretation of documents internally, discuss documents with Jeff Shaw	.70	206.50
6/08/23	RGW	Emails with counsel for Oberhansly	.20	90.00
6/09/23	JMC	Correspond with Michael Hoppe and Claire McGuire re various clawback cases; Correspond with James Tracy re the same	2.40	1,020.00
6/09/23	MTH	Review correspondence from Claire McGuire re stipulated motion and order and correspond with Claire McGuire re proposed revisions; Meeting with Joe Covey and Claire McGuire re case strategy on Larsen matter and strategy on Darren Nelson matter	1.30	526.50
6/09/23	MTH	Review correspondence from Joe Covey re Larsen matter	.10	40.50
6/09/23	WOP	Call with Joe re settlement	.60	168.00
6/09/23	CMM	Review motion for writ of habeas corpus ad testificandum filed by Larsen counsel; Attorney conference with Joseph Covey and Michael Hoppe re Larsen motion and Nelson bankruptcy issues; Review bankruptcy documents filed by Nelson and compare to financial statement	4.60	1,196.00
6/09/23	CBB	In Muir matter, respond to email from Josh Lee and communicate about the same with counsel in firm	.20	59.00
6/09/23	CY	Edit and revise motion to extend rule 56(d) stay and briefing schedule; Email correspondence with Claire McGuire re same (Hafen v Larsen)	1.00	155.00
6/12/23	JMC	Correspond with Jeff Balls and Matt Ball re litigation issues involving expert report; Review correspondence from Ray Strong re the same; Review and analyze bankruptcy filing of clawback defendant; Correspond with Wesley White re research	2.70	1,147.50
6/12/23	RMB	Review Troy Piantes settlement correspondence and related documents; Review status of Kennedy-Barnes matter; Review Lugli analysis and KCP investment claw-back claim	1.40	567.00
6/12/23	MJB	(Hafen v. Howell) Conference with Joe Covey and Jeff Balls (0.3)	.30	117.00

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6/12/23	JAB	Review expert report of Ray Strong; Conference with Joseph Covey and Matt Ball re same; Review deposition of Gaylen Rust; Conference with Robert Wing re clawback matters	2.70	999.00
6/12/23	RGW	Meeting with Joni Ostler re claims; Review Sargent and Ellingford documents	1.10	495.00
6/13/23	JMC	Correspond with Steve McCardell re meeting with his client on clawback action; Correspond with Jeff Balls re upcoming hearing and related issues	.50	212.50
6/13/23	MTH	Review information re case schedule for Larsen matter	.10	40.50
6/13/23	JAB	Correspond with Ray Strong; Call Steve Waterman	.10	37.00
6/13/23	CBB	Discuss meet and confer with opposing counsel in Muir matter; Discuss with Jeff Shaw and Claire McGuire	.40	118.00
6/13/23	RGW	Review Sargent documents; Conference with Jennifer Luft re same	.30	135.00
6/14/23	JAB	Telephone conference with Steven Waterman; Review order from court re Jacobsen claim; Telephone conference with Ray Strong	.90	333.00
6/14/23	CMM	Review and revise complaint in matter yet to be filed against party who defaulted per settlement	2.60	676.00
6/14/23	DW	Email correspondence with Claire McGuire re Ault Complaint	.10	24.00
6/14/23	DW	Draft Ault Complaint	.40	96.00
6/14/23	JL	Search for documents involving Sargent family	2.50	475.00
6/15/23	MTH	Conference with Joe Covey re Larsen matter; Review and respond to correspondence from opposing counsel in Larsen matter	.20	81.00
6/15/23	CMM	Review settlements with potential claw back defendants; Review writ Motion filed by Larsen and send to client; Communicate with Tom Melton and Jeffery Balls re ending of Guyon tolling agreement	2.80	728.00
6/15/23	CBB	Draft and revise settlement agreement between the Receiver and Rose and Charlotte Percell and discuss agreement with opposing counsel	3.20	944.00
6/15/23	CBB	Draft, revise, and finalize settlement agreement in Percell matter and draft and revise motion to approve settlement; Discuss these documents with opposing counsel	3.30	973.50
6/16/23	JMC	Correspond with Michael Hoppe and James Tracy re Larsen litigation matter	.20	85.00
6/16/23	MTH	Review correspondence from Jon Hafen re Larsen matter and review motion from Larsen re deposition	.10	40.50
6/16/23	MTH	Review and respond to correspondence from opposing counsel in Larsen matter	.10	40.50
6/16/23	CMM	Communicate with Guyon re ending of tolling agreement; Review letter sent by Guyon re the same; Communicate with Jeffery Balls, Robert Wing and Tom Melton re the same and claims in letter; Communicate with opposing counsel in Larsen matter re call related to settlement negotiations	3.60	936.00
6/16/23	CBB	Prepare for and participate in phone call with opposing counsel in Muir matter re the Receiver's response to interrogatory no. 1 from Muir	.70	206.50

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6/16/23	CBB	In Muir matter, review and search for disclosed documents and investor analysis documents in preparation for meet and confer, and in response to request from opposing counsel; Discuss the existence and location of certain documents with Jeff Shaw	3.90	1,150.50
6/19/23	JMC	Correspond with Michael Hoppe, Claire McGuire and others re Rick Rose re Rick Larsen settlement and related issues; Correspond with Jeff Shaw re the same; Review and analyze financials related to clawback bankruptcy filing; Correspond with Jon Hafen and others re the same	4.60	1,955.00
6/19/23	MTH	Meeting with Joe Covey and Claire McGuire re case strategy in Larsen matter in preparation for meeting with opposing counsel; Meeting with opposing counsel in Larsen re case; Conference with Joe Covey and Claire McGuire re case	1.60	648.00
6/19/23	JAB	Review for deposition of Gaylen Rust; Telephone conference with Matthew Barneck	1.30	481.00
6/19/23	CMM	Communicate with opposing counsel re meet and confer meeting in Oberhansly matter; Review initial disclosures served in the same; Attempt to access documents in the same matter; Attorney conference with Robert Wing re the same; Attorney conference with Joseph Covey and Michael Hoppe re research needed in Larsen and Nelson matters; Meeting with Bryant Holloway to discuss the same	3.30	858.00
6/19/23	CBB	In Percell matter, review executed settlement agreement, take to Jon Hafen for signature, discuss docusign with Jon, communicate and coordinate with internal staff to get completed settlement agreement from Jon	.40	118.00
6/19/23	DW	Draft Ault Complaint; Research legal implications of creditors' access to the assets of Alaska trusts	6.70	1,608.00
6/19/23	BH	Meet with Claire re voidable transfer defense	.30	72.00
6/19/23	RGW	Review initial disclosure documents re Oberhansly	.20	90.00
6/20/23	JMC	Review and analyze Darren Nelson bankruptcy filing documents	.60	255.00
6/20/23	MTH	Review and evaluate information re Darren Nelson bankruptcy and financial disclosures and correspond with team re same	.40	162.00
6/20/23	JAB	Review correspondence re Darren Nelson; Correspond with Jeff Shaw; Telephone conference with Rocky Mountain Collections re outstanding balance for Layton property; Telephone conference with Matthew Barneck; Conference with Claire McGuire; Conference with Robert Wing	1.60	592.00
6/20/23	CMM	Attorney conference with Robert Wing re meet and confer call with John Webster and remaining issues including scheduling meditation; Pull documents for draft of mediation brief; Meet with Jeffery Balls re claims made by Guyon in response letter and need to file Complaint; Revise Guyon complaint and prepare for filing	5.80	1,508.00
6/20/23	CBB	Discuss executed settlement agreement with counsel for Rose and Charlotte Percell	.20	59.00
6/20/23	CBB	Review order to show case to the warden of FCI Yazoo City Medium	.20	59.00

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6/20/23	CBB	Review email request from James Tracy re documentation of investor statements in Muir matter	.10	29.50
6/20/23	BH	Research reasonably equivalent value under the UVTA	2.70	648.00
6/21/23	RMB	Review Troy Piantes emails re settlement; Prepare Troy Piantes settlement agreement; Review Andreini group claw-back analysis for default judgment and settlement strategy for Terri Andreini and Mike Johnson; Review correspondence with Luisa Marquez and Miriam Martinez and investment related documentation	4.40	1,782.00
6/21/23	JAB	Review documents for deposition of Gaylen Rust; Email Ryan Pahnke	4.00	1,480.00
6/21/23	CMM	File new claw back action and attend to issues associated with the same; Draft discovery issues letter to opposing counsel	1.60	416.00
6/21/23	CBB	In Percell matter, draft, revise, and finalize motion to approve settlement and request staff file the motion with executed settlement agreement attached	.40	118.00
6/22/23	RMB	Analyze Troy Piantes investment related issues as well as Florida homestead issues in connection with settlement; Prepare settlement agreement for Troy Piantes; Analyze confession of judgment issues and Florida law judgment collection issues; Review KCB Investment notes and documentation	4.80	1,944.00
6/22/23	MTH	Review bankruptcy notice for Darren Nelson; Conference with Claire McGuire re Nelson and Larsen cases	.40	162.00
6/22/23	WOP	Call with artist re purchasing work; Review agreement with Rust; Correspond with artist re same	2.20	616.00
6/22/23	CMM	Review Darren Nelson financial documents and bankruptcy filings; Review research memo related to the same re dischargeable debts; Communicate with Michael Hoppe and Joseph Covey re the same; Review requests by opposing counsel related to Muir and Larsen productions; Attorney conference with Crista Yancey re the same; Review initial disclosures produced	6.60	1,716.00
6/22/23	CMM	Communicate with opposing counsel and Robert Wing re discovery issues; Plan for upcoming mediation with the same; Draft potential settlement negotiation to Guyon	1.60	416.00
6/22/23	CBB	In Percell matter, discuss filing of proposed order with staff	.10	29.50
6/23/23	RMB	Prepare Confession of Judgment for Troy Piantes; Prepare Settlement Agreement; Review Dolores Batalla motion to approve settlement; Review financial records for Miriam Martinez in connection with settlement agreement; Review docket for Terri Andreini investment group; Review Terri Andreini correspondence and investment records; Review Florida case law on homestead exemptions and fraud exceptions	4.70	1,903.50
6/23/23	MTH	Review and respond to correspondence from opposing counsel in Larsen case	.10	40.50
6/23/23	JAB	Review transcript of Gaylen Rust deposition	1.10	407.00

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6/23/23	CBB	Review and analyze investor statements in Muir claw back action; Review record documents for evidence of investment totals; Review emails from Jeff Shaw; Discuss document searches in database with Claire McGuire; Draft and send email to opposing counsel summarizing position on Muir's contributions	3.70	1,091.50
6/23/23	CBB	In Percell claw back action, draft and revise proposed order accompanying joint motion to approve settlement agreement (.4); Effectuate filing of proposed order and order, and discuss internally (.3)	.70	206.50
6/23/23	CY	Email correspondence with Johnna Smith re production of docs that were sent in Muir case; Upload docs to dropbox to send to outside counsel	2.20	341.00
6/23/23	RGW	Emails re Oberhansly mediation	.20	90.00
6/24/23	JAB	Review prior deposition of Gaylen Rust	1.10	407.00
6/25/23	JAB	Travel to Yazoo City; Prepare for deposition of Gaylen Rust	13.70	5,069.00
6/26/23	JMC	Correspond with Michael Hoppe, Jeff Balls, Claire McGuire re clawback litigation issues	1.70	722.50
6/26/23	RMB	Review Lugli claim file and claim analysis; Review and respond to email from Tony Napolitano re Lugli claim status	.60	243.00
6/26/23	JAB	Conduct deposition of Gaylen Rust; Telephone conference with Jeff Shaw; Prepare for deposition of Gaylen Rust	11.70	4,329.00
6/26/23	CMM	Attorney conference with Chaunceton Bird re responses to discovery issues in Muir claw back; Research documents associated with the same and draft response; Draft settlement communication and service communication to Guyon	4.20	1,092.00
6/26/23	CBB	In Percell matter, review and analyze order granting settlement agreement	.20	59.00
6/26/23	CBB	Discuss status and strategy in Muir matter with attorneys internally	.30	88.50
6/26/23	CY	Attorney conference with Claire McGuire re production of docs for Muir case; Phone and email correspondence with Johnna Smith with BTJD re docs needed; Download docs to flash drive for Johnna Smith with BTJD	7.20	1,116.00
6/26/23	RGW	Review documents in preparation for mediation; Review email from mediator	1.10	495.00
6/27/23	JMC	Meeting with Michael Hoppe and Claire McGuire re legal strategy in clawback action	.90	382.50
6/27/23	RMB	Revise Troy Piantes Settlement Agreement and Confession of Judgment; Review Motion to Approve Dolores Batalla settlement agreement; Review Guadalupe Valencia settlement status	1.70	688.50
6/27/23	MTH	Meeting with Joe Covey and Claire McGuire re Darren Nelson case; Review correspondence from Receiver re bankruptcy issues	.60	243.00
6/27/23	JAB	Attend deposition of Gaylen Rust; Travel to Jackson	10.00	3,700.00

PARR BROWN GEE & LOVELESS

Invoice: 930004
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

July 15, 2023
 Client: 176430
 Matter: 2

Date	Tkpr	Description	Hours	Amount
6/27/23	CMM	Attorney conference with Michael Hoppe and Joseph Covey re issues in Larsen and Nelson claw back actions; Research issues related to Larsen and off set for value of exchange as of the start of a Ponzi scheme; Communicate with Guyon re entities represented or not; Attorney conference with Crista Yancey re production issues for Muir and Larsen	7.40	1,924.00
6/27/23	CY	Continue downloading docs to flash drive for Johnna Smith with BTJD for Muir case	9.70	1,503.50
6/28/23	JAB	Return home from Jackson; Review documents from HBME	10.80	3,996.00
6/28/23	CBB	Email counsel for Rose and Charlotte Percell re settlement check	.10	29.50
6/28/23	BH	Research reasonably equivalent value under the UVTA	.80	192.00
6/28/23	BH	Draft memo re reasonably equivalent values	3.60	864.00
6/28/23	CY	Draft acceptance for service for Claire McGuire (Hafen v Guyon)	.30	46.50
6/29/23	JAB	Review documents re Taylor litigation; Telephone conference with Ray Strong and Jeff Shaw re Taylor deposition; Conference with Robert Wing	3.20	1,184.00
6/29/23	CMM	Review Nelson's notice of filing of bankruptcy; Research issue of value of offset for reasonably equivalent value defense for Larsen summary judgement; Draft initial portion of summary judgement motion	6.80	1,768.00
6/29/23	CBB	Review emails and document disclosures from opposing counsel re Vanessa Percell's claim of inability to pay and organize and save files; Email files to Jeff Shaw for analysis and request call after his analysis	.60	177.00
6/29/23	BH	Finish memo re reasonably equivalent value; Email memo to Claire McGuire	.30	72.00
6/29/23	RGW	Review Oberhansly documents re arbitration issues	1.80	810.00
6/30/23	JAB	Review settlement agreement; Review documents for Taylor clawback	1.90	703.00
6/30/23	CMM	Communicate with client and Robert Wing re Oberhansly mediation; Draft factual section of Larsen summary judgement motion; Research limited summary judgment issues	4.20	1,092.00
6/30/23	RGW	Review Oberhansly records to prepare mediation Statement; Begin drafting mediation statement	2.10	945.00
TOTAL PROFESSIONAL SERVICES				\$ 254,620.00

PARR BROWN GEE & LOVELESS

Invoice: 930004
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

July 15, 2023
 Client: 176430
 Matter: 2

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	425.00	88.40	37,570.00
Rodger M Burge	405.00	99.30	40,216.50
Michael T Hoppe	405.00	21.80	8,829.00
Matthew J Ball	390.00	1.30	507.00
Jeffery A Balls	370.00	87.70	32,449.00
Abbey W Farnsworth	330.00	2.00	660.00
Chaunceton B Bird	295.00	64.30	18,968.50
Walter O Peterson	280.00	67.90	19,012.00
Claire M McGuire	260.00	266.70	69,342.00
Thomas M Melton	450.00	13.50	6,075.00
Robert G Wing	450.00	14.40	6,480.00
Drake Walker	240.00	11.00	2,640.00
Bryant Holloway	240.00	7.70	1,848.00
Eric Love	240.00	12.30	2,952.00
Sheryl Dirksen - Paralegal	205.00	.70	143.50
Susan Bailey - Paralegal	205.00	1.00	205.00
Jennifer Luft - Paralegal	190.00	4.30	817.00
Crista Yancey - Paralegal	155.00	38.10	5,905.50
TOTALS		802.40	\$ 254,620.00

COSTS ADVANCED

Date	Description	Amount
4/04/23	Utah Department of Health & Human Services - Request of Kayleen Roberts' death certificate	30.00
4/13/23	SimpleCertified Mail	8.39
4/24/23	City Creek Parking - Jeffrey Balls parking	12.00
4/25/23	Salt Lake Legal - Document production for Larsen Clawback case	96.76
4/28/23	PACER Electronic Court Records	4.40
4/28/23	Green Filing - death certificate of Kayleen Roberts	5.00
4/28/23	Green Filing - proposed statement of informal appointment of personal representative	5.00
5/17/23	PACER Electronic Court Records	5.80
	Copies - B & W	75.60
6/02/23	DepomaxMerit Litigation Services - Deposition Transcript of Richard Larsen	814.85
6/06/23	SimpleCertified Mail	8.39
6/11/23	Airfare, Delta, Jeffrey Balls	1,406.40
6/12/23	PACER Electronic Court Records	8.50
6/21/23	Utah District Court - complaint	402.00
6/25/23	Non-local Meals, Cotw-Ridgeland, Jeffrey Balls	27.73
6/26/23	Non-local Meals, Popeyes, Jeffrey Balls	13.07
6/27/23	Hotel, Hampton by Hilton, Jeffrey Balls	302.27
6/27/23	Non-local Meals, Moss Creek Fish House, Jeffrey Balls	28.55
6/28/23	Hotel, Courtyard by Marriott, Jeffrey Balls	165.76
6/28/23	Non-local Meals, Grindhouse Killer Burgers, Jeffrey Balls	21.39

PARR BROWN GEE & LOVELESS

Invoice: 930004
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

July 15, 2023
 Client: 176430
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Date	Description	Amount
6/28/23	Non-local rental car/taxi, Budget, Jeffery Balls	363.48
6/28/23	Non-local rental car/taxi, Shell, Jeffery Balls	34.04
6/30/23	SimpleCertified Mail	16.78
TOTAL COSTS ADVANCED		\$ 3,856.16
TOTAL THIS INVOICE		\$ 258,476.16

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

Rust Rare Coin Receivership

July 15, 2023

Invoice: 930004
Client: 176430
Matter: 2

REMITTANCE ADVICE

RE: Asset Analysis & Recovery

BALANCE DUE THIS INVOICE \$ 258,476.16

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 # 930004

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

July 15, 2023

Invoice: 930005
Client: 176430
Matter: 3

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Disposition of Assets

Professional Services	\$ 1,759.50
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 1,759.50

PARR BROWN GEE & LOVELESS

Invoice: 930005
 Rust Rare Coin Receivership
 Disposition of Assets

July 15, 2023
 Client: 176430
 Matter: 3

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/03/23	JMC	Review and revise motion to sale musical IP; Correspond with Claire McGuire re the same	.60	255.00
4/03/23	CMM	Revise IP asset sale motion and order; Communicate the same with Joseph Covey; Review quit claim deed returned by music publishing rights purchaser for revisions; Communicate with Joseph Covey re the same	2.80	728.00
4/04/23	CMM	Review and revise IP motion per comments from Joseph Covey; Communicate with Receiver re approval of the same; Prepare motion for filing	1.50	390.00
4/12/23	CY	Edit and revise motion for authority to sell musical intellectual property rights without prior court approval	.30	46.50
4/20/23	JMC	Correspond with claimants re claim questions	.30	127.50
5/11/23	JMC	Correspond with attorney George Hofmann re sale of IP music assets	.50	212.50

TOTAL PROFESSIONAL SERVICES \$ 1,759.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	425.00	1.40	595.00
Claire M McGuire	260.00	4.30	1,118.00
Crista Yancey - Paralegal	155.00	.30	46.50
TOTALS		6.00	\$ 1,759.50

TOTAL THIS INVOICE \$ 1,759.50

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

Rust Rare Coin Receivership

July 15, 2023

Invoice: 930005
Client: 176430
Matter: 3

REMITTANCE ADVICE

RE: Disposition of Assets

BALANCE DUE THIS INVOICE \$ 1,759.50

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

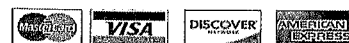
Routing #: 124001545
Account #: 912454114

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

Please reference your invoice # 930005

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



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ATTORNEYS AT LAW

Rust Rare Coin Receivership

July 15, 2023

Invoice: 930007
Client: 176430
Matter: 5

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Claims Administration

Professional Services	\$ 91,749.50
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 91,749.50

PARR BROWN GEE & LOVELESS

Invoice: 930007
Rust Rare Coin Receivership
Claims Administration

July 15, 2023
Client: 176430
Matter: 5

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/04/23	JL	Prepare attorney planning meeting report in Oberhansley	1.40	266.00
4/05/23	JAB	Conference with Jonathan Hafen and Claire McGuire re claims process; Review claims response forms; Call claimants re claims	2.30	851.00
4/05/23	CMM	Prepare for and create meeting agenda for meeting with Jonathan Hafen and Jeffery Balls re claims registry publication and evidence sufficiency questions with respect to claimant responses submitted responding to claim determinations	2.80	728.00
4/05/23	JL	Continue drafting attorney planning meeting report	1.00	190.00
4/06/23	JAB	Review claims; Conference with Claire McGuire, Lori Stumpf, and Jennifer Luft	5.10	1,887.00
4/06/23	CMM	Prepare for an attend meeting with Jonathan Hafen and Jeffery Balls re responses to claims analysis and determination; Review all responses submitted and guidance re how such responses will be dealt with; Research claimant responses as to extra time granted by previous attorneys	6.20	1,612.00
4/06/23	JL	Conference to discuss responses	.90	171.00
4/06/23	JL	Review and log claim response forms; View emails on website	3.40	646.00
4/07/23	JAB	Review claims for claims registry; Conference with Claire McGuire; Correspond with claimants	3.20	1,184.00
4/07/23	CMM	Meeting with Jenn Luft and Lori Stumpf re intake procedures for responses to claims analysis; Draft guidance re the same as well as sample responses; Review intake receipt drafted by paralegal	2.40	624.00
4/07/23	CMM	Review claim response from claimant fixing issues per determination	.60	156.00
4/10/23	JAB	Review claims; Telephone conference with Jeff Shaw; Conference with Jennifer Luft; Telephone conference with claimants; Email Matt Moscon re claimant	5.30	1,961.00
4/10/23	JL	Review response of Leland S. Jacobson Trust, Mary Suzanne Peterson; Thomas G. Harrison, and ZAD Consulting	1.80	342.00
4/11/23	JMC	Correspond with Claire McGuire, Jon Hafen and George Hofmann re the sale of music IP motion	.40	170.00
4/11/23	JAB	Review claims responses; Telephone conference with claimants	2.00	740.00
4/11/23	JL	Review claims for Neibaur, Clark; review address for changes; review website for emails.	1.20	228.00
4/12/23	JAB	Revise claims registry;	2.30	851.00
4/12/23	JL	Process responses from M. Isreal and D. Neville; Check email and webpage	1.10	209.00
4/13/23	JMC	Correspond with Jeff Balls re claims issues	.10	42.50
4/13/23	JAB	Review pleading re Jacobsen claim	2.50	925.00
4/13/23	JL	Review incoming email and mail on Wordpress; download and review files from S. Bailey	.70	133.00

PARR BROWN GEE & LOVELESS

Invoice: 930007
Rust Rare Coin Receivership
Claims Administration

July 15, 2023
Client: 176430
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Date	Tkpr	Description	Hours	Amount
4/14/23	JAB	Correspond with claimants; Conference with Claire McGuire re claim responses; Review and analyze claims responses	5.50	2,035.00
4/14/23	CMM	Prepare for and attend claims Reponses meeting with Jeffery Balls; Follow up calling claimants who have submitted response forms	2.50	650.00
4/17/23	JAB	Telephone conference with Erik Olsen; Review claims	3.10	1,147.00
4/17/23	CMM	Review and respond to questions related to sufficiency of evidence sent in by claimants responding to determinations of the Receiver; Review original claims re the same	2.70	702.00
4/17/23	JL	Complete production sets from Everlaw	1.30	247.00
4/17/23	JL	Review and process responses from T. Johnson and M. Thelin; read and forward other incoming email; review messages on webpage	.70	133.00
4/18/23	JAB	Review claims registry; Telephone conference with claimants re claims; Telephone conference with Jeff Shaw	2.90	1,073.00
4/18/23	JL	Review and process responses from E. and C. Wordal, S. S. Peterson, Peterson Advantage, T. Fisher, and D. Millett; Review past emails.	1.40	266.00
4/19/23	JAB	Review and revise claims registry; Correspond with claimants re registry	4.80	1,776.00
4/19/23	JL	Review and process claims for D. Baker and B. Fisher; Review and process new emails	1.40	266.00
4/20/23	JAB	Revise claims registry; Review claims; Correspond with claimants	3.40	1,258.00
4/20/23	JL	Review of the Rust Rare Coin emails	.30	57.00
4/21/23	JAB	Review and revise claims registry; Telephone conference with claimants; Correspond with claimants; Conference with Claire McGuire	3.90	1,443.00
4/21/23	JL	Review and process response from B Clark; Check Rust email and webpage	.40	76.00
4/24/23	JAB	Review and revise claims registry	3.50	1,295.00
4/24/23	JL	Process response of D. Shuck and update spreadsheets; Check emails and webpage	.50	95.00
4/25/23	JMC	Correspond with T. Fisher re claim issues; Correspond with Jeff Balls re hearing on Zions settlement	.40	170.00
4/25/23	JAB	Respond to inquiries through website; Revise claims registry; Telephone conference with Jeff Shaw	3.50	1,295.00
4/25/23	JL	Review inbox and webpage for claims	.30	57.00
4/26/23	JMC	Correspond with Jeff Balls re claims issues	.10	42.50
4/26/23	JAB	Review claims registry; Correspond with claimants; Telephone conference with Jeff Shaw	5.30	1,961.00
4/26/23	JL	Process claims, check email and webpage	1.10	209.00
4/27/23	JAB	Review claims registry; Correspond with claimants; Telephone conference with Ryan Pahnke	1.30	481.00
4/27/23	JL	Process claims; check email and website	.80	152.00
4/28/23	JAB	Telephone conference with claimants; Conference with Claire McGuire	5.30	1,961.00
4/28/23	JL	Process responses; check email and webpage	.50	95.00

PARR BROWN GEE & LOVELESS

Invoice: 930007
Rust Rare Coin Receivership
Claims Administration

July 15, 2023
Client: 176430
Matter: 5

Date	Tkpr	Description	Hours	Amount
5/01/23	JAB	Review and revise claims registry; Conference with Jonathan Hafen and Claire McGuire; Correspond with claimants; Review settlement offer from Dominic Shaw; Conference with Rodger Burge re same	5.40	1,998.00
5/01/23	CMM	Telephone conference with various claimants; Claims response meetings to review new evidence and make determinations; Claims response meeting and settlement approvals with Jonathan Hafen and Jeffery Balls; Follow up with various claimants re the same	4.60	1,196.00
5/01/23	JL	Review and process claims from M. Gregory, R. Gregory, Roofmasters Group, L. Transfield, and M. Thelin; Check webpage	1.50	285.00
5/02/23	JAB	Correspond with team re receiver email address; Review response claim forms; Telephone conference with claimants; Correspond with claimants; Correspond with Ryan Pahnke	2.60	962.00
5/02/23	CMM	Review questions from claimants re responses to claims determinations	.60	156.00
5/02/23	JL	Check mail, email, and website for responses.	.50	95.00
5/03/23	JMC	Correspond with Jeff Balls re claim response issues	.50	212.50
5/03/23	JAB	Review response forms; Review and revise claims registry; Telephone conference with claimants	4.00	1,480.00
5/03/23	JL	Process claims for GAP Properties and Shade Properties; Email S. Anderson re the need for a signed signature page; Check the website for messages	1.00	190.00
5/04/23	JMC	Correspond with Steve McCardell re Bary Jones claim issues	1.00	425.00
5/04/23	JAB	Telephone conference with claimants; Correspond with claimants; Conference with Joseph Covey	2.40	888.00
5/04/23	CMM	Communicate with Zions counsel re confidential settlement and claims registry issues; Communicate with claimants re responses; Review new claimant responses to registry	1.80	468.00
5/04/23	JL	Review and process incoming claims; Check webpage	2.20	418.00
5/05/23	JAB	Correspond with Jennifer Luft; Telephone conference with claimants; Review and revise claims registry	2.50	925.00
5/05/23	CMM	Review responses submitted by claimants; Communicate with several claimants re discrepancies in claims	1.80	468.00
5/05/23	JL	Process claims; Check Email and webpage	1.70	323.00
5/08/23	JMC	Correspond with Jon Hafen and Steve McCardell re Bary Jones claim	.40	170.00
5/08/23	JAB	Review response forms; Conference with Claire McGuire re same	5.70	2,109.00
5/08/23	CMM	Attorney conference with Jeffery Balls re responses to claims registry; Follow up with various claimants re objections and new documentation	1.60	416.00
5/08/23	JL	Process claims; Check email and webpage	1.40	266.00
5/09/23	JMC	Correspond with Steve McCardell and others re Bary Jones claim and settlement meeting	.80	340.00
5/09/23	JAB	Review response forms from claimants; Revise claims registry; Telephone conference with claimants; Correspond with claimants	1.90	703.00
5/09/23	JL	Process claims; Check email and webpage	1.00	190.00

PARR BROWN GEE & LOVELESS

Invoice: 930007
Rust Rare Coin Receivership
Claims Administration

July 15, 2023
Client: 176430
Matter: 5

Date	Tkpr	Description	Hours	Amount
5/10/23	JMC	Correspond with Jeff Balls re claims issues and related matters	.10	42.50
5/10/23	JAB	Review response forms	2.20	814.00
5/10/23	JL	Process claims;	.80	152.00
5/11/23	JMC	Correspond with Walter Peterson re Bary Jones claim information	.50	212.50
5/11/23	JAB	Review and revise claims registry; Correspond with Jared Scott; Conference with claimants	1.30	481.00
5/11/23	CMM	Attorney conference with Jeffery Balls re parties subject to settlement agreement and entity ability to file separate claims	.40	104.00
5/11/23	CMM	Coordinate intake and storage of files related to claims and responses to claims registry with Jenn Luft and Lori Stumpf; Communicate with investor re new claim documentation	1.60	416.00
5/11/23	JL	Process response; check emails and webpage	.50	95.00
5/12/23	JMC	Correspond with Jeff Balls and court clerk re upcoming hearing and various claims; Correspond with Steve Waterman re the Zions claim and response deadline; Correspond with Walter Peterson re claim issues	4.00	1,700.00
5/12/23	JAB	Correspond with J. Scott re claims; Correspond with claimants re claims; Correspond with Jeff Shaw	1.60	592.00
5/15/23	JMC	Review and analyze consignment, secured transactions and investments for Bary Jones; Correspond with Jeff Balls, Jeff Shaw, Claire McGuire and Walter Peterson re the same; Review and analyze other claims issues; Correspond with Jeff Balls re the same	7.90	3,357.50
5/15/23	JAB	Review claim response forms; Conference with Claire McGuire re same; Conference with Jeff Shaw, Claire McGuire, Joseph Covey, and Walter Peterson; Telephone conference with claimants; Correspond with claimants; Telephone conference with Ryan Pahnke	7.40	2,738.00
5/15/23	CMM	Prepare for and attend meeting with Jeffery Balls and Jeff Shaw to discuss determinations and follow up re various claims registry responses; Follow up with various claimants re the same	2.20	572.00
5/16/23	JMC	Correspond with Walter Peterson re claim issues; Review and analyze Bary Jones claim issues	.70	297.50
5/16/23	JAB	Review response forms; Telephone conference with claimants	8.50	3,145.00
5/16/23	JL	Process claims; check emails and webpage	2.90	551.00
5/17/23	JAB	Correspond with claimants; Telephone conference with claimants; Revise claims registry; Conference with claimants	7.50	2,775.00
5/17/23	CMM	Communicate with claimants re reinstatement of claims	.40	104.00
5/17/23	JL	Process incoming responses; check emails and webpage	3.80	722.00
5/18/23	JAB	Review response forms; Telephone conference with claimants; Correspond with J. Scott re claims	2.90	1,073.00
5/18/23	JL	Process claims; Check email and webpage	2.20	418.00
5/19/23	JAB	Review response forms; Telephone conference with Dominic Shaw	6.40	2,368.00

PARR BROWN GEE & LOVELESS

Invoice: 930007
Rust Rare Coin Receivership
Claims Administration

July 15, 2023
Client: 176430
Matter: 5

Date	Tkpr	Description	Hours	Amount
5/19/23	CMM	Prepare for and attend claims response determination meeting with Jeffery Balls and Jenn Luft; Follow up with various claimants re needed information and handling of claims; Meet with Jonathan Hafen and Joseph Covey re music publishing rights and claims determinations or objections	3.90	1,014.00
5/19/23	JL	Process claims; check emails and webpage	2.20	418.00
5/19/23	JL	Attend claims/response meeting	1.30	247.00
5/22/23	JAB	Review response forms; Conference with Jennifer Luft; Conference with Joseph Covey, Walter Peterson, Claire McGuire, Jeff Shaw, and Jonathan Hafen	5.00	1,850.00
5/22/23	JL	Communicate via written communication with claimants re confirmation of agreement of claim assessment; analyze and reconcile R. Wells claims	5.80	1,102.00
5/23/23	JAB	Conference with Joseph Covey, Jeff Shaw, Walter Peterson, Claire McGuire, and Steve McCardell; Conference with Jeff Shaw	7.20	2,664.00
5/23/23	JL	Summary of B. Hone Racing billing	6.50	1,235.00
5/24/23	JMC	Correspond with George Hofmann re sale of music IP to Catherine Todd	.20	85.00
5/24/23	JAB	Review correspondence to Jonathan Hafen; Research inquiry notice; Conference with Jennifer Luft; Review claim documents	2.90	1,073.00
5/24/23	JL	Continue to summarize Rust Hone Racing's invoices for CL0370	5.40	1,026.00
5/25/23	JAB	Review claims	.40	148.00
5/26/23	JAB	Correspond with Dominic Shaw; Review correspondence re claim	.20	74.00
5/26/23	JAB	Review claim response forms	.40	148.00
6/01/23	CMM	Communicate with Jennifer Luft and Jeffery Balls re question from claimant about response and objections to registry	.30	78.00
6/01/23	JL	Review and process claim from S. and M. Adams	.30	57.00
6/02/23	JL	Communicate with claimant re receiving response	.20	38.00
6/05/23	JAB	Review claims forms; Telephone conference with claimants; Correspond with Jeff Shaw	1.80	666.00
6/06/23	JAB	Review claim forms; Telephone conference with claimants; Correspond with Jeff Shaw	2.00	740.00
6/06/23	CMM	Review claims issues; Communicate with Jeffery Balls re remaining disputes	.40	104.00
6/07/23	JAB	Review settlement correspondence	.20	74.00
6/08/23	JAB	Review correspondence re settlement	.20	74.00
6/09/23	JAB	Review claim response forms; Conference with Jeff Shaw	3.90	1,443.00
6/12/23	JAB	Review response forms; Telephone conference with claimants	.50	185.00
6/12/23	WW	Meet with Joseph Covey re assignment on comparing D. Nelson finance statement with bankruptcy documents, drafting proof of claim, and researching whether Ponzi scheme debts are nondischargeable; Start reviewing D. Nelson financial documents	1.40	336.00
6/12/23	JL	Review of emails on Rust Receiver	1.20	228.00

PARR BROWN GEE & LOVELESS

Invoice: 930007
 Rust Rare Coin Receivership
 Claims Administration

July 15, 2023
 Client: 176430
 Matter: 5

Date	Tkpr	Description	Hours	Amount
6/13/23	JAB	Correspond with Jeff Shaw; Review	.50	185.00
6/13/23	WW	Review, analyze, and compare D. Nelson's bankruptcy documents, verified financial statement, 2018 2020 tax returns, and bank statements	2.60	624.00
6/14/23	JAB	Review response forms; Correspond with claimants	.30	111.00
6/15/23	JAB	Telephone conference with Jeff Shaw re claims; Review response forms	2.80	1,036.00
6/16/23	WW	Review financial records of D. Nelson; Start researching case law re nondischargeable debts in bankruptcy	.90	216.00
6/17/23	JAB	Review claims registry	.10	37.00
6/19/23	JAB	Review response claims registry; Correspond with Claire McGuire re same	1.20	444.00
6/19/23	WW	Research case law re whether fraudulent transfer debt is dischargeable in bankruptcy; Draft memo on findings and analysis re D. Nelson's financials and on findings and analysis re research on fraudulent transfer debt	4.30	1,032.00
6/21/23	JL	Review and compile exhibits from C. Taylor deposition for use in spreadsheets	4.20	798.00
6/22/23	JAB	Review documents; Telephone conference with Jeff Shaw	4.30	1,591.00
6/27/23	JAB	Review claims; Call claimant re claim	.20	74.00
6/30/23	JAB	Review claims registry	.60	222.00

TOTAL PROFESSIONAL SERVICES \$ 91,749.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	425.00	17.10	7,267.50
Jeffery A Balls	370.00	162.20	60,014.00
Claire M McGuire	260.00	36.80	9,568.00
Wesley White	240.00	9.20	2,208.00
Jennifer Luft - Paralegal	190.00	66.80	12,692.00
TOTALS		292.10	\$ 91,749.50

TOTAL THIS INVOICE \$ 91,749.50

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

July 15, 2023

Rust Rare Coin Receivership

Invoice: 930007
Client: 176430
Matter: 5

REMITTANCE ADVICE

RE: Claims Administration

BALANCE DUE THIS INVOICE \$ 91,749.50

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 # 930007

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

July 15, 2023

Invoice: 930008
Client: 176430
Matter: 42

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Zions Class Action

Professional Services	\$ 1,503.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 1,503.00

PARR BROWN GEE & LOVELESS

Invoice: 930008
 Rust Rare Coin Receivership
 Zions Class Action

July 15, 2023
 Client: 176430
 Matter: 42

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/11/23	JAB	Review Zions claims registry; Email Paul Scarlato	.30	111.00
4/12/23	JAB	Revise claims registry; Telephone conference with Paul Scarlato	1.10	407.00
4/24/23	JAB	Prepare for hearing; Attending hearing	2.10	777.00
5/04/23	CMM	Review confidential settlement and communication with counsel	.80	208.00
TOTAL PROFESSIONAL SERVICES				\$ 1,503.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jeffery A Balls	370.00	3.50	1,295.00
Claire M McGuire	260.00	.80	208.00
TOTALS		4.30	\$ 1,503.00

TOTAL THIS INVOICE \$ 1,503.00

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

July 15, 2023

Rust Rare Coin Receivership

Invoice: 930008
Client: 176430
Matter: 42

REMITTANCE ADVICE

RE: Zions Class Action

BALANCE DUE THIS INVOICE \$ 1,503.00

Please return this advice with payment to:

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

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201 South Main St Ste 300
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E-Check

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

EFT/ACH Pay Instructions

Routing #: 124001545
Account #: 912454114

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Please reference your invoice # 930008

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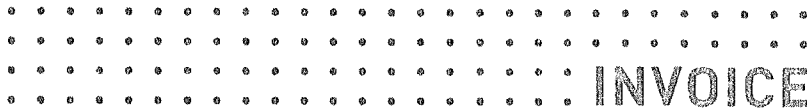
EXHIBIT C

EXHIBIT C

NINETEENTH FEE APPLICATION

BRG Fees and Expenses

EXHIBIT C



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

August 21, 2023
Client-Matter: 16222-25457
Invoice #: 158792
Tax ID # 27-1451273

Via Email: jhafen@parrbrown.com

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

Services Rendered From April 1, 2023 Through June 30, 2023

Professional Services	\$ 117,664.00	USD
Voluntary Reduction	(1,597.50)	
Expenses Incurred	<u>105.13</u>	
CURRENT CHARGES	\$ 116,171.63	USD

PAYMENT IS DUE BY September 20, 2023

Please direct questions regarding this invoice to: Jeffrey Shaw at 801.364.6233 or 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: 158792

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



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 # 158792
 Client-Matter: 16222-025457

Services Rendered From April 1, 2023 Through June 30, 2023

PROFESSIONAL SERVICES

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Managing Director			
Vernon Calder	440.00	1.20	528.00
Ray Strong	400.00	29.40	11,760.00
Associate Director			
Leif Larsen	355.00	16.60	5,893.00
Jeffrey Shaw	355.00	262.90	93,329.50
Jeffrey Shaw	0.00	4.50	N/C
Managing Consultant			
Christina Tergevorkian	250.00	0.60	150.00
Case Assistant			
Kellee Calder	145.00	0.30	43.50
Yuhao Xu	125.00	34.90	4,362.50
Total Professional Services		350.40	116,066.50

EXPENSES

Data Retrieval	100.99
Postage	4.14
Total Expenses	105.13

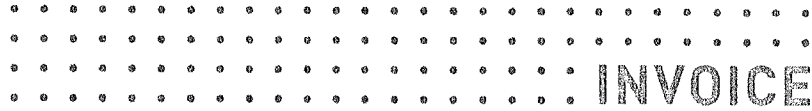


To: Jonathan O. Hafen
c/o: Parr Brown Gee & Loveless
RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

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Invoice # 158792
Client-Matter: 16222-025457

SUMMARY BY TASK CODE

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
350	Net Winner / Claims Analysis	122.40	36,604.00
500	Recovery Litigation	153.80	54,675.50
600	Tax Compliance & Analysis	1.00	355.00
610	Income Tax Preparation	15.10	5,399.50
730	Deposition Preparation	53.60	19,032.50
950	Fee Application Preparation & Hearing	4.50	0.00
Total Professional Services		350.40	116,066.50



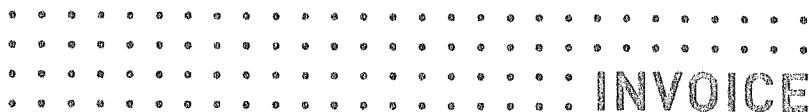
To: Jonathan O. Hafen
 c/o: Parr Brown Gee & Loveless
 RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

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 Invoice # 158792
 Client-Matter: 16222-025457

Services Rendered From April 1, 2023 Through June 30, 2023

DETAIL OF PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 350 - Net Winner / Claims Analysis					
04/06/23	Jeffrey Shaw	Analyzed investor activity and support.	0.90	355.00	319.50
04/06/23	Jeffrey Shaw	Review and discussion regarding investor activity.	1.50	355.00	532.50
04/06/23	Jeffrey Shaw	Analyzed investor claims.	1.80	355.00	639.00
04/06/23	Jeffrey Shaw	Call with counsel to discuss claims issues.	0.40	355.00	142.00
04/07/23	Jeffrey Shaw	Reviewed and updated investor transaction data.	1.10	355.00	390.50
04/07/23	Jeffrey Shaw	Analyzed █████ transactions and support per inquiry from counsel.	2.30	355.00	816.50
04/07/23	Jeffrey Shaw	Review and discussion with staff regarding investor analysis.	0.80	355.00	284.00
04/07/23	Jeffrey Shaw	Analyzed investor claim and support in connection with counsel inquiry.	1.60	355.00	568.00
04/07/23	Jeffrey Shaw	Call with counsel regarding █████ group transactions.	0.20	355.00	71.00
04/07/23	Yuhao Xu	Analyzed investor non-bank activity and prepared summary schedule.	4.50	125.00	562.50
04/10/23	Jeffrey Shaw	Reviewed investor activity summary schedule.	1.90	355.00	674.50
04/10/23	Jeffrey Shaw	Analyzed █████ group activity and supporting documents.	1.70	355.00	603.50
04/10/23	Jeffrey Shaw	Prepared email/schedule regarding investor activity in response to counsel inquiry.	0.90	355.00	319.50
04/10/23	Jeffrey Shaw	Reviewed investor claims responses and activity.	1.00	355.00	355.00
04/10/23	Jeffrey Shaw	Call with counsel regarding claimant response forms to claim registry.	0.80	355.00	284.00
04/11/23	Jeffrey Shaw	Reviewed and updated investor transaction data and net winner schedules.	2.30	355.00	816.50
04/11/23	Yuhao Xu	Analyzed investor non-bank activity and prepared summary schedule.	1.30	125.00	162.50



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 # 158792
 Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/12/23	Jeffrey Shaw	Analyzed investor activity in connection with preparing summary schedule.	3.70	355.00	1,313.50
04/12/23	Jeffrey Shaw	Analyzed [REDACTED] activity and support and replied to counsel inquiry.	1.50	355.00	532.50
04/12/23	Yuhao Xu	Analyzed the investor non-bank activity and prepared summary schedule	2.30	125.00	287.50
04/13/23	Jeffrey Shaw	Analyzed investor activity in connection with investor summary.	2.30	355.00	816.50
04/14/23	Jeffrey Shaw	Discussions with staff regarding investor analysis.	0.60	355.00	213.00
04/14/23	Yuhao Xu	Analyzed investor bank activity and prepared summary schedule.	0.80	125.00	100.00
04/14/23	Yuhao Xu	Analyzed investor bank activity and prepared summary schedule.	2.90	125.00	362.50
04/14/23	Yuhao Xu	Analyzed investor bank activity and prepared summary schedule.	2.90	125.00	362.50
04/18/23	Jeffrey Shaw	Call with counsel regarding claims issues.	0.20	355.00	71.00
04/18/23	Jeffrey Shaw	Reviewed and updated investor transaction data and reports.	2.50	355.00	887.50
04/18/23	Yuhao Xu	Analyzed investor bank activity and prepared summary schedule	2.50	125.00	312.50
04/19/23	Jeffrey Shaw	Discussion with staff regarding investor analysis.	0.30	355.00	106.50
04/19/23	Yuhao Xu	Analyzed investor bank activity and prepared summary schedule.	2.00	125.00	250.00
04/20/23	Jeffrey Shaw	Analyzed [REDACTED] investment activity and responded to counsel inquiry.	1.80	355.00	639.00
04/20/23	Jeffrey Shaw	Analyzed investor claims and investment activity and support.	2.70	355.00	958.50
04/20/23	Yuhao Xu	Analyzed investor bank activity and prepared summary schedule.	1.00	125.00	125.00
04/21/23	Jeffrey Shaw	Analyzed investor data and support in connection with claims responses.	5.40	355.00	1,917.00
04/21/23	Jeffrey Shaw	Call with counsel regarding claim issues.	0.80	355.00	284.00



INVOICE

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

Page 6 of 14
 Invoice # 158792
 Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/21/23	Jeffrey Shaw	Review and discussions with staff regarding investor analysis.	0.50	355.00	177.50
04/21/23	Yuhao Xu	Analyzed investor bank activity and prepared summary schedule.	2.90	125.00	362.50
04/21/23	Yuhao Xu	Analyzed investor bank activity and prepared summary schedule.	1.40	125.00	175.00
04/24/23	Jeffrey Shaw	Analyzed investor data and support in connection with claims responses.	2.70	355.00	958.50
04/24/23	Jeffrey Shaw	Call with counsel regarding claim issues.	0.20	355.00	71.00
04/25/23	Jeffrey Shaw	Reviewed and provided requested investor support to counsel in connection to claim response.	0.50	355.00	177.50
04/26/23	Jeffrey Shaw	Prepared [REDACTED] schedules per counsel request.	1.00	355.00	355.00
04/26/23	Jeffrey Shaw	Discussion with counsel regarding claim issues.	0.40	355.00	142.00
04/26/23	Jeffrey Shaw	Analyzed investor activity and responded to counsel inquiry in connection with claims response.	0.90	355.00	319.50
04/26/23	Yuhao Xu	Analyzed investor bank activity and prepared summary schedule.	2.50	125.00	312.50
04/28/23	Yuhao Xu	Analyzed investor bank activity and prepared summary schedule.	2.50	125.00	312.50
05/15/23	Jeffrey Shaw	Prepared for and attended meeting with counsel regarding [REDACTED] activity.	3.60	355.00	1,278.00
05/15/23	Jeffrey Shaw	Analyzed [REDACTED] investment activity and support.	1.20	355.00	426.00
05/16/23	Jeffrey Shaw	Follow-up with counsel regarding claims issues.	0.20	355.00	71.00
05/16/23	Jeffrey Shaw	Reviewed [REDACTED] claim settlement offer.	0.50	355.00	177.50
05/16/23	Jeffrey Shaw	Reviewed investor activity and support in preparation for call with counsel regarding claims.	1.50	355.00	532.50
05/16/23	Jeffrey Shaw	Call with counsel regarding claim issues.	2.10	355.00	745.50
05/17/23	Jeffrey Shaw	Call with counsel regarding claims issues.	0.80	355.00	284.00



INVOICE

To: Jonathan O. Hafen
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 RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

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 Invoice # 158792
 Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/17/23	Jeffrey Shaw	Analyzed █████ transactions and support.	3.10	355.00	1,100.50
05/22/23	Jeffrey Shaw	Prepared for and met with counsel and Receiver regarding █████ activity.	3.50	355.00	1,242.50
05/22/23	Jeffrey Shaw	Reviewed █████ activity and prepared schedule.	3.80	355.00	1,349.00
05/23/23	Jeffrey Shaw	Prepared for and attended meeting with counsel and █████.	4.10	355.00	1,455.50
05/23/23	Jeffrey Shaw	Follow-up meeting with counsel regarding █████.	1.50	355.00	532.50
05/23/23	Jeffrey Shaw	Reviewed response to claims with counsel.	2.00	355.00	710.00
05/24/23	Jeffrey Shaw	Reviewed and provided feedback on email regarding █████ investment activity.	1.90	355.00	674.50
06/08/23	Jeffrey Shaw	Responded to counsel inquiry regarding █████ activity.	0.40	355.00	142.00
06/09/23	Jeffrey Shaw	Prepared for and call with counsel regarding claims issues.	4.50	355.00	1,597.50
06/09/23	Jeffrey Shaw	Analyzed █████ group claims.	2.20	355.00	781.00
06/14/23	Jeffrey Shaw	Reviewed and updated cash receipts and disbursement analysis.	2.10	355.00	745.50
06/15/23	Jeffrey Shaw	Call with counsel to discuss claim issues.	2.60	355.00	923.00
06/16/23	Jeffrey Shaw	Analyzed █████ group activity and support.	2.90	355.00	1,029.50
06/16/23	Jeffrey Shaw	Call regarding █████ investment activity.	0.60	355.00	213.00
06/16/23	Christina Tergevorkian	Reviewed investor activity and transactions.	0.60	250.00	150.00
Total for Task Code 350			122.40		36,604.00
Task Code: 500 - Recovery Litigation					
04/11/23	Jeffrey Shaw	Follow-up regarding litigation issues.	0.20	355.00	71.00
04/12/23	Jeffrey Shaw	Reviewed and responded to litigation issues.	0.50	355.00	177.50
04/17/23	Jeffrey Shaw	Analyzed Percell documents.	3.50	355.00	1,242.50



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

Page 8 of 14
 Invoice # 158792
 Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/18/23	Jeffrey Shaw	Reviewed and responded to emails regarding litigation issues.	0.30	355.00	106.50
04/18/23	Jeffrey Shaw	Analyzed Percell documents.	1.80	355.00	639.00
04/18/23	Jeffrey Shaw	Call with counsel regarding Percell litigation.	0.70	355.00	248.50
04/24/23	Jeffrey Shaw	Analyzed case documents for in connection with initial discovery.	0.50	355.00	177.50
04/24/23	Jeffrey Shaw	Prepared Larsen asset schedule per counsel request.	0.60	355.00	213.00
04/25/23	Jeffrey Shaw	Analyzed Larsen documents and support and prepared asset schedule per counsel request.	4.50	355.00	1,597.50
04/26/23	Jeffrey Shaw	Analyzed Larsen documents and support and prepared asset schedule per counsel request.	4.20	355.00	1,491.00
04/27/23	Jeffrey Shaw	Call with counsel regarding litigation issues.	0.30	355.00	106.50
04/27/23	Jeffrey Shaw	Reviewed and prepared M Oberhansly documents for initial discovery.	6.30	355.00	2,236.50
05/15/23	Jeffrey Shaw	Reviewed and follow-up with counsel regarding litigation issues.	0.50	355.00	177.50
05/16/23	Jeffrey Shaw	Follow-up with counsel regarding litigation issues.	0.50	355.00	177.50
05/16/23	Jeffrey Shaw	Reviewed litigation status and information.	0.50	355.00	177.50
05/17/23	Jeffrey Shaw	Analyzed Muir investor activity and documents produced.	2.40	355.00	852.00
05/22/23	Jeffrey Shaw	Reviewed documents produced in Larsen litigation.	0.30	355.00	106.50
05/23/23	Leif Larsen	Analyzed tax returns of Richard Larsen and prepared summary schedule.	1.90	355.00	674.50
05/24/23	Leif Larsen	Analyzed tax returns of Richard Larsen and updated summary schedule.	0.60	355.00	213.00
05/24/23	Jeffrey Shaw	Analyzed documents produced in R Larsen litigation.	2.80	355.00	994.00
05/24/23	Jeffrey Shaw	Reviewed deposition outline for R Larsen.	0.90	355.00	319.50



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 # 158792
Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
05/24/23	Jeffrey Shaw	Reviewed and discussed Larsen tax return.	1.30	355.00	461.50
05/25/23	Leif Larsen	Analyzed tax returns of Richard Larsen and updated summary schedule.	0.50	355.00	177.50
05/25/23	Jeffrey Shaw	Reviewed Larsen investment activity and support.	4.50	355.00	1,597.50
05/25/23	Jeffrey Shaw	Reviewed and prepared emails regarding Larsen investment activity.	0.70	355.00	248.50
05/25/23	Jeffrey Shaw	Call with counsel regarding Larsen litigation.	0.40	355.00	142.00
05/25/23	Jeffrey Shaw	Prepared documents requested by counsel in connection with Larsen deposition.	0.50	355.00	177.50
05/25/23	Jeffrey Shaw	Reviewed documents produced in Larsen litigation.	1.20	355.00	426.00
05/26/23	Jeffrey Shaw	Prepared for and attended R Larsen deposition.	5.00	355.00	1,775.00
05/26/23	Jeffrey Shaw	Reviewed Larsen investment activity and discussions with Receiver and counsel regarding status.	2.20	355.00	781.00
05/30/23	Jeffrey Shaw	Reviewed and analyzed Larsen support and activity and responded to email regarding the same.	2.90	355.00	1,029.50
05/30/23	Jeffrey Shaw	Analyzed Muir investment activity.	3.50	355.00	1,242.50
05/31/23	Jeffrey Shaw	Reviewed information provided in Percell litigation.	0.50	355.00	177.50
05/31/23	Jeffrey Shaw	Reviewed and updated litigation deadlines.	0.30	355.00	106.50
05/31/23	Jeffrey Shaw	Analyzed Muir investment activity and support.	3.90	355.00	1,384.50
06/01/23	Jeffrey Shaw	Reviewed Percell activity, support and produced documents.	4.80	355.00	1,704.00
06/02/23	Jeffrey Shaw	Analyzed Percell activity and documents.	2.90	355.00	1,029.50
06/02/23	Jeffrey Shaw	Call with counsel regarding litigation issues.	0.50	355.00	177.50
06/02/23	Jeffrey Shaw	Analyzed Muir activity and support and prepared schedule.	3.40	355.00	1,207.00



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 # 158792
 Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/07/23	Jeffrey Shaw	Analyzed Muir documents and activity.	5.10	355.00	1,810.50
06/07/23	Jeffrey Shaw	Call with counsel regarding Muir responses.	0.70	355.00	248.50
06/07/23	Jeffrey Shaw	Reviewed discovery responses and emails for Muir litigation.	0.50	355.00	177.50
06/08/23	Jeffrey Shaw	Analyzed Muir documents and activity.	3.10	355.00	1,100.50
06/08/23	Jeffrey Shaw	Discussions and emails regarding Muir activity.	0.70	355.00	248.50
06/08/23	Jeffrey Shaw	Prepared schedule of Muir activity.	1.10	355.00	390.50
06/14/23	Ray Strong	Attended call with counsel regarding updated expert report.	0.40	400.00	160.00
06/14/23	Ray Strong	Reviewed status of pending litigation.	0.30	400.00	120.00
06/15/23	Jeffrey Shaw	Analyzed Taylor activity and schedules.	1.90	355.00	674.50
06/16/23	Jeffrey Shaw	Reviewed litigation deadlines.	0.50	355.00	177.50
06/16/23	Jeffrey Shaw	Analyzed Taylor activity and updated schedule.	1.80	355.00	639.00
06/19/23	Jeffrey Shaw	Analyzed Taylor activity, support and schedules.	7.50	355.00	2,662.50
06/20/23	Jeffrey Shaw	Analyzed Taylor depositions and exhibits.	6.00	355.00	2,130.00
06/21/23	Jeffrey Shaw	Analyzed Taylor depositions and exhibits.	6.10	355.00	2,165.50
06/22/23	Jeffrey Shaw	Analyzed Taylor depositions and exhibits.	1.50	355.00	532.50
06/22/23	Jeffrey Shaw	Call with counsel regarding Taylor litigation.	1.80	355.00	639.00
06/22/23	Jeffrey Shaw	Reviewed activity and prepared Taylor schedule.	4.20	355.00	1,491.00
06/23/23	Jeffrey Shaw	Analyzed Taylor activity and support.	3.00	355.00	1,065.00
06/26/23	Jeffrey Shaw	Analyzed documents produced in Percell litigation.	2.10	355.00	745.50
06/26/23	Jeffrey Shaw	Follow-up regarding status of litigation matters.	0.30	355.00	106.50
06/26/23	Jeffrey Shaw	Call with counsel regarding Taylor litigation.	2.40	355.00	852.00
06/26/23	Jeffrey Shaw	Analyzed Taylor investment activity and support.	1.70	355.00	603.50



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 # 158792
 Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/27/23	Jeffrey Shaw	Analyzed documents produced in Percell litigation.	1.50	355.00	532.50
06/27/23	Jeffrey Shaw	Analyzed investment activity and documents produced in Muir litigation.	4.30	355.00	1,526.50
06/27/23	Jeffrey Shaw	Call with counsel regarding Taylor litigation.	0.80	355.00	284.00
06/28/23	Jeffrey Shaw	Analyzed investment activity and documents produced in Muir litigation.	5.80	355.00	2,059.00
06/29/23	Jeffrey Shaw	Analyzed documents produced in Percell litigation.	0.80	355.00	284.00
06/29/23	Jeffrey Shaw	Reviewed litigation status and deadlines.	0.50	355.00	177.50
06/29/23	Jeffrey Shaw	Analyzed investment activity and documents produced in Percell litigation.	4.90	355.00	1,739.50
06/29/23	Jeffrey Shaw	Call with counsel regarding Taylor litigation.	1.40	355.00	497.00
06/30/23	Jeffrey Shaw	Coordinated meeting regarding Oberhansly litigation.	0.30	355.00	106.50
06/30/23	Jeffrey Shaw	Analyzed investment activity and documents produced in Percell litigation.	7.00	355.00	2,485.00
06/30/23	Ray Strong	Attended call with Counsel regarding Gaylen Rust deposition.	1.00	400.00	400.00
Total for Task Code 500			153.80		54,675.50
Task Code: 600 - Tax Compliance & Analysis					
04/10/23	Jeffrey Shaw	Reviewed tax payment and email regarding the same.	0.20	355.00	71.00
04/11/23	Jeffrey Shaw	Reviewed and responded to inquiries regarding tax issues.	0.50	355.00	177.50
04/17/23	Jeffrey Shaw	Follow-up regarding tax issues.	0.30	355.00	106.50
Total for Task Code 600			1.00		355.00

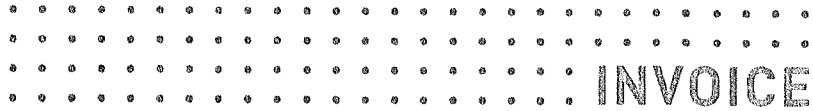


INVOICE

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 # 158792
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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 610 - Income Tax Preparation					
04/07/23	Leif Larsen	Prepared an initial draft of the 2022 receivership return and prepared Form 7004 and submitted to the proper taxing authorities.	0.80	355.00	284.00
04/07/23	Leif Larsen	Prepared 2022 Form TC-559 for the receivership and requested corresponding payment.	0.40	355.00	142.00
04/11/23	Vernon Calder	Reviewed 2022 Form 7004, Application for Automatic Extension of Time to File Certain Business Income Tax, Information and Other Returns.	0.10	440.00	44.00
04/28/23	Leif Larsen	Analyzed 2022 transaction detail in order to identify taxable receipts, deductible expenditures and other reportable activity for the preparation of the 2022 receivership returns.	2.90	355.00	1,029.50
05/01/23	Leif Larsen	Prepared supporting work papers to be used in the preparation of the 2022 receivership returns.	2.60	355.00	923.00
05/01/23	Leif Larsen	Prepared the 2022 federal receivership return.	2.90	355.00	1,029.50
05/01/23	Leif Larsen	Prepared the 2022 state receivership return.	1.60	355.00	568.00
05/02/23	Leif Larsen	Reviewed and referenced the 2022 receivership returns and supporting work papers.	1.20	355.00	426.00
05/09/23	Vernon Calder	Reviewed 2022 income tax returns - Rust Receivership.	0.70	440.00	308.00
05/09/23	Vernon Calder	Verified clearance of review notes on 2022 income tax returns and related tax file.	0.20	440.00	88.00
05/09/23	Leif Larsen	Cleared review notes related to the 2022 income tax returns.	1.20	355.00	426.00
05/10/23	Kellee Calder	Prepared 2022 income tax returns for submission to State taxing authorities.	0.30	145.00	43.50
05/11/23	Vernon Calder	Performed final review and signed 2022 income tax returns - Rust Rare Receivership.	0.20	440.00	88.00
Total for Task Code 610			15.10		5,399.50



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 730 - Deposition Preparation					
04/03/23	Jeffrey Shaw	Analyzed [REDACTED] activity and support in connection with Zion's matter.	5.90	355.00	2,094.50
04/03/23	Ray Strong	Analyzed investor statements for Zions deposition preparation.	3.10	400.00	1,240.00
04/04/23	Jeffrey Shaw	Analyzed [REDACTED] activity and support in connection with Zion's litigation.	7.10	355.00	2,520.50
04/04/23	Ray Strong	Analyzed case documents in preparation for deposition in Zions/Investor matter.	4.50	400.00	1,800.00
04/04/23	Ray Strong	Analyzed expert report in preparation for deposition in Zions/Investor matter.	3.10	400.00	1,240.00
04/04/23	Ray Strong	Analyzed Expert report exhibits/appendices in preparation for deposition in Zions/Investor matter.	2.70	400.00	1,080.00
04/05/23	Jeffrey Shaw	Analyzed [REDACTED] activity and prepared supporting documents in connection with Zions litigation.	6.40	355.00	2,272.00
04/05/23	Ray Strong	Analyzed expert report in preparation for deposition in Zions/Investor matter.	2.80	400.00	1,120.00
04/05/23	Ray Strong	Analyzed case documents in preparation for deposition in Zions/Investor matter.	1.80	400.00	720.00
04/05/23	Ray Strong	Analyzed case documents in preparation for deposition in Zions/Investor matter.	2.80	400.00	1,120.00
04/05/23	Ray Strong	Analyzed Expert report exhibits/appendices in preparation for deposition in Zions/Investor matter.	4.10	400.00	1,640.00
04/05/23	Yuhao Xu	Analyzed and compiled transaction support for [REDACTED] group.	4.40	125.00	550.00
04/06/23	Jeffrey Shaw	Reviewed and prepared [REDACTED] investment schedules in connection with Zions litigation.	1.10	355.00	390.50
04/06/23	Ray Strong	Analyzed expert report in preparation for deposition in Zions/Investor matter.	2.80	400.00	1,120.00



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 # 158792
 Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
04/06/23	Yuhao Xu	Analyzed and compiled transaction support for █████ group.	1.00	125.00	125.00
Total for Task Code 730			53.60		19,032.50
Task Code: 950 - Fee Application Preparation & Hearing					
05/30/23	Jeffrey Shaw	Reviewed and revised time entries and descriptions for Jan-Mar.	0.50	0.00	N/C
05/31/23	Jeffrey Shaw	Reviewed and revised time entries and descriptions for Jan-Mar.	1.50	0.00	N/C
06/01/23	Jeffrey Shaw	Prepared narrative for Q1 fee application.	0.90	0.00	N/C
06/01/23	Jeffrey Shaw	Reviewed, finalized and submitted Q1 invoice to Receiver.	0.90	0.00	N/C
06/01/23	Jeffrey Shaw	Reviewed and revised Q1 invoice.	0.70	0.00	N/C
Total for Task Code 950			4.50		0.00
Professional Services			350.40		116,066.50

DETAIL OF EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
Data Retrieval		
05/16/23	CCH - Data Retrieval Timekeeper : 09999 - Applicable, Not Invoice #: 5414204353 Vchr Comment: ProSystem fx Tax	93.04
05/23/23	CCH - Data Retrieval Timekeeper : 09999 - Applicable, Not Invoice #: 5414184922 Vchr Comment: #4001041067	7.95
Total For Data Retrieval		100.99
Postage		
05/31/23	BRG Misc Clearing - BRG Misc Clearing 05/31/2023 Rust Rare Coins Invoice #: 053123a Vchr Comment: 053123 Salt Lake City Postage chargeback Timekeeper : 09999 - Applicable, Not	4.14
Total For Postage		4.14
Expenses		105.13

EXHIBIT D

EXHIBIT D

NINETEENTH FEE APPLICATION

Time Records of Conflict Receiver and Conflict Receiver's Counsel

EXHIBIT D

Rust Coin Receivership
Time Detail for Wayne Klein, Conflicts Receiver
April 1, 2023 to June 30, 2023

Date	Worker	Hours	Rate	Amount	Description
4/13/2023	WK	0.7	250.00	175.00	Read draft Zions Bank reply to motion to transfer claim, create redline, send comments to D. Castleberry; approve filing (.5); call with S. Waterman on changes (.2).
4/25/2023	WK	0.9	250.00	225.00	Review PACER for results of hearing on settlement of class action against Zions Bank; read judgment and final approval order; send comments to J. Hafen and D. Castleberry.
4/27/2023	WK	0.1	250.00	25.00	Read notice of hearing re: transfer of Jacobson claim; email D. Castleberry.
6/26/2023	WK	0.1	250.00	25.00	Read court ruling on Zion Bank motion re: Jacobson claim; respond to S. Waterman.
Total		1.8		450.00	



**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

May 23, 2023

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

PERSONAL AND CONFIDENTIAL

Bill No. 90966756
Client.Matter # 102434.000004

Re: Rust Rare Coin Receivership

For professional services rendered through April 30, 2023, in connection with the above-referenced matter as outlined on the attached detailed billing sheets:

Fees	\$630.00
Expenses.....	\$0.00
Total Due This Bill.....	\$630.00

Other invoices outstanding as of 04/30/23 (if payment has been made, kindly disregard this reminder):

Date	Bill No.	Fees & Expenses	Credits	Balance Due
03/20/23	90910807	840.00	0.00	840.00
04/16/23	90929398	1,610.00	0.00	1,610.00

<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



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 April 30, 2023

Date	Initials	Description	Hours	Amount
04/06/23	DC	Read filing in case; follow up re issues in case; email exchange with Receiver and counsel for Zions Bank.	0.50	175.00
04/13/23	DC	Email exchanges re filings in case.	0.50	175.00
04/25/23	DC	Read and respond to email from Wayne Klein re class action settlement.	0.20	70.00
04/25/23	DC	Read emails re potential settlements and identify follow up re same.	0.20	70.00
04/26/23	DC	Read email from Jeff Balls re dismissal of North Valley Partners case.	0.20	70.00
04/27/23	DC	Read filing re hearing in matter and email exchanges with receiver re same.	0.20	70.00
Total Services:			1.80	630.00

Timekeeper Summary

Timekeeper	Title	Rate	Hours	Amount
David C. Castleberry	Shareholder	350.00	1.80	630.00

TOTAL FEES	\$630.00
TOTAL EXPENSES	\$0.00
TOTAL THIS BILL	\$630.00



**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

July 28, 2023

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

PERSONAL AND CONFIDENTIAL

Bill No. 91014424
Client.Matter # 102434.000004

Re: Rust Rare Coin Receivership

For professional services rendered through June 30, 2023, in connection with the above-referenced matter as outlined on the attached detailed billing sheets:

Fees	\$140.00
Expenses.....	\$0.00
Total Due This Bill.....	\$140.00

<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 FinOps@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 June 30, 2023

Date	Initials	Description	Hours	Amount
06/14/23	DC	Email communications regarding hearing in case.	0.20	70.00
06/14/23	DC	Read order from court regarding hearing regarding transfer of claim.	0.20	70.00
Total Services:			0.40	140.00

Timekeeper Summary

Timekeeper	Title	Rate	Hours	Amount
David C. Castleberry	Shareholder	350.00	0.40	140.00

TOTAL FEES	\$140.00
TOTAL EXPENSES	\$0.00
TOTAL THIS BILL	\$140.00

EXHIBIT E

EXHIBIT E
NINETEENTH 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

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

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 NINETEENTH
INTERIM FEE APPLICATION**

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

Judge Tena Campbell

Magistrate Judge Dustin Pead

Before the Court is the nineteenth 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 April 1, 2023, through June 30, 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: | \$23,852.00 for fees. |
| b. | Parr Brown: | \$354,002.50 for fees and
\$3,913.19 for out-of-pocket expenses. |
| c. | BRG: | \$116,066.50 for fees and
\$105.13 for out-of-pocket expenses. |
| d. | Conflict Receiver: | \$1,220.00 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 September 2023.

Honorable Dustin B. Pead
United States Magistrate Judge