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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.

**TWENTY-FIRST 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 twenty-first 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”) and Sacks Tierney P.A. (“Arizona Counsel”); and the Receiver’s accountants, Berkeley Research Group (“BRG”), for the period of October 1, 2023, through December 31, 2023 (the “Application Period”). The Receiver seeks authorization to pay all allowed fees and expenses from the Receivership Estate once the Receiver has recovered an amount equal to three times the fees requested in this Fee Application and allowed in prior applications. In support hereof, the Receiver states as follows:

I. RELEVANT BACKGROUND

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

2. The Receiver has filed his *Twenty-First Quarterly Status Report*, which includes a status report for the period of October 1, 2023, through December 31, 2023 (the “Quarterly Status Report”).¹ The Quarterly Status Report provides a comprehensive description of the services performed by the Receiver and his professionals during the Application Period and is incorporated herein by reference.

¹ Docket No. 531 filed January 31, 2024.

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, 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, Arizona Counsel 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 and BRG in this Fee Application, including the relevant voluntary write downs, are summarized below:

a. Receiver: From October 1, 2023, through December 31, 2023, the Receiver billed a total of 38.2 hours for services to the Receivership Estate. The Receiver is seeking approval for the payment of fees and expenses totaling \$17,003.50. *See Exhibit A.*

b. Parr Brown: From October 1, 2023, through December 31, 2023, Parr Brown billed a total of 748.3 hours for legal services to the Receivership Estate. Parr Brown is seeking approval for the payment of fees and expenses totaling \$258,611.36 of which \$257,557.00 is for fees and \$1,054.36 is for out-of-pocket expenses. *See Exhibit B.* These amounts include a voluntary write down of \$11,005.50.

c. BRG: From October 1, 2023, through December 31, 2023, BRG billed a total of 532.90 hours providing forensic, tax, and general accounting services to the Receivership Estate. BRG is seeking approval for the payment of fees and expenses

totaling \$178,699.00. *See Exhibit C.* These amounts include a voluntary write down of \$994.00.

d. Arizona Counsel: From October 1, 2023, through December 31, 2023, Arizona Counsel billed a total of 9.4 hours for legal services to the Receivership Estate. Arizona Counsel is seeking approval for the payment of fees and expenses totaling \$2,803.88. *See Exhibit D.*

11. The amounts requested reflect a total of \$11,999.50 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, Arizona Counsel 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. The Receiver and his team have completed the claims analysis process and are focused on resolving all remaining outstanding claims. Having resolved the vast majority of the claims, and as set forth in more detail in the Quarterly Status Report, the Receiver made three distributions to Claimants in the amount of over twenty-three million dollars.

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 previously submitted to the Court the Claims Registry packet, which identifies all 668 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. Only five unresolved claims remain which are either involved in claw back litigation or are stayed by the Court. Parr Brown continues to diligently resolve each unresolved claim while minimizing expenses to the Receivership Estate. Parr Brown also worked closely with the Receiver to make the initial distributions to Claimants in the amount of over twenty-three million dollars.

Exhibit C-Time Records of BRG

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

Net Winner/Claims Analysis & Distribution

26. BRG continued to analyze and review information, support, and transaction data contained in Rust Rare Coin's records, as well as investor claims for various investors in connection with the Receiver's claims review process. BRG has assisted the Receiver and his team in determining the allowed claim amounts for claimants through verifying accuracy, identifying any issues with the claim, and reconciling the amount being claimed by the investor with the books and records of Rust Rare Coin. BRG also continues to assist the Receiver in providing analysis for investors to be used in discussions, negotiations, and potential settlement recoveries in outstanding clawback actions that have been brought by the Receiver.

27. BRG has also developed and prepared a distribution model consistent with the rising tide distribution methodology approved by the Receiver and the Court. In its preparation

and development of this model, BRG reviewed and verified claims data, including cash receipts and disbursements, supporting documents, and other relevant information and data. Throughout this process, BRG worked with the Receiver and his professionals and engaged in frequent discussions regarding claims information, the distribution model, the initial amount to be distributed to claimants, and the plan of distribution. BRG also prepared initial distribution schedules which were provided to the distribution agent for payment.

Recovery Litigation

28. BRG has continued to be involved in assisting the Receiver in various clawback matters. BRG has analyzed and prepared support, declarations, expert reports and exhibits in connection with various litigation matters in which the Receiver is involved.

29. Specifically, BRG performed extensive analyses and review of Rust Rare Coin's accounting records, point of sale data, and investor transaction data and support in connection with current clawback litigation in which the Receiver is involved. BRG also reviewed deposition testimony given in this matter, as well as opposing expert reports which were produced. Finally, in response to the opposing expert reports produced in this matter, BRG prepared an expert rebuttal report, including exhibits and appendices. BRG also prepared an updated declaration and schedules in connection with this litigation.

30. BRG has continued to work 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 and Analysis

31. BRG has assisted the Receiver in reviewing and researching tax issues associated

with the plan of distribution. Specifically, BRG performed analysis and review of issues related to the requirements and tax implications of the wage claims and Zion's distribution.

Exhibit D-Time Records of Arizona Counsel

32. As a result of the Receiver's and his team's clawback efforts, the Receiver previously secured a judgment in favor of the Receivership Estate against net winners who own real property in the State of Arizona. The Receiver engaged Arizona Counsel to advise the Receiver and take the steps necessary under Arizona law to foreclose on the real property. During the application period, Arizona Counsel domesticated and attached the judgment to the net winners' real property, paving the way for the Receiver to foreclosure in the event the judgement remains unpaid.

VI. PRIOR REQUESTS AND INTERIM NATURE OF REQUEST

33. The Receiver has previously filed twenty interim fee applications,² all of which were approved by the Court. *See* Dkt. Nos. 153, 203, 247, 275, 293, 339, 368, 383, 414, 418, 429, 435, 443, 463, 482, 490, 495, 509, 517 and 530. This is the Twenty-First Interim Fee Application of the Receiver and his professionals. The Receiver and his professionals understand that the

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. The Receiver's Nineteenth Interim Fee Application was filed on September 20, 2023. *See* Dkt. No. 516. The Receiver's Twentieth Interim Fee Application was filed on December 13, 2023. *See* Dkt. No. 528.

authorization and payment of fees and expenses is interim in nature. All fees and expenses allowed on an interim basis will be subject to final review at the close of the case and the discharge of the Receiver when the Receiver files a final accounting and the Receiver and his professional's file final fee applications.

41. For the reasons set forth above, and as supported by the Exhibits attached hereto, the Receiver respectfully submits that the fees and expenses requested herein are for actual services that were necessary for and beneficial to the administration of the Receivership Estate. The Receiver has made every attempt to limit the administrative expenses of 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 and expenses in the amount of \$17,003.50; Parr Brown's fees in the amount of \$257,557.00 and out-of-pocket expenses of \$1,054.36; BRG's fees and expenses in the amount of \$178,699.00; Arizona Counsel's fees and expenses in the amount of \$2,803.88, 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, Arizona Counsel and BRG verify under penalty of perjury that the foregoing is true and correct.

DATED this 14th day of March 2024.

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
Jeffery A. Balls
Walter O. Peterson
Attorneys for Receiver Jonathan O. Hafen

BERKELEY RESEARCH GROUP

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

SACKS TIERNEY P.A.

By: /s/ *Michael Harris
Michael Harris
**Electronically signed with permission*

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the above TWENTY-FIRST INTERIM FEE APPLICATION was (1) electronically filed with the Clerk of the Court through the CM/ECF system on March 14, 2024, 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>John Robinson, Jr. DEISS LAW PC 10 W 100 S STE 425 SALT LAKE CITY, UT 84101 (801)433-0226 jrobinson@deisslaw.com</p>	<p>Thomas L. Simek COMMODITY FUTURES TRADING COMMISSION 4900 MAIN ST STE 500 KANSAS CITY, MO 64112 (816)960-7760 tsimek@cftc.gov</p>
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<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

TWENTY-FIRST INTERIM FEE APPLICATION

Time Records of Receiver

EXHIBIT A

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

Rust Rare Coin Receiver

January 15, 2024

Invoice: 938386
Client: 177110
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration

Professional Services	\$ 712.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 712.00

PARR BROWN GEE & LOVELESS

Invoice: 938386
 Rust Rare Coin Receiver
 Administration

January 15, 2024
 Client: 177110
 Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/04/23	JOH	Review email correspondence with regulator	.10	44.50
11/07/23	JOH	Attention to two clawback actions; Call and Email with legal counsel re same; Review email correspondence re same; Follow up re tax issue; Review proposed settlement agreement	1.50	667.50

TOTAL PROFESSIONAL SERVICES \$ 712.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	445.00	1.60	712.00
TOTALS		1.60	\$ 712.00

TOTAL THIS INVOICE \$ 712.00

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

January 15, 2024

Rust Rare Coin Receiver

Invoice: 938386
Client: 177110
Matter: 1

REMITTANCE ADVICE

RE: Administration

BALANCE DUE THIS INVOICE

\$ 712.00

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

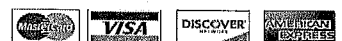
Routing #: 124001545
Account #: 912454114

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

Please reference your invoice # 938386

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

January 15, 2024

Invoice: 938387
Client: 177110
Matter: 2

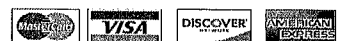
INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Assett Analysis & Recovery

Professional Services	\$ 10,635.50
Total Costs Advanced	<u>\$ 4.50</u>
TOTAL THIS INVOICE	\$ 10,640.00



PARR BROWN GEE & LOVELESS

Invoice: 938387
 Rust Rare Coin Receiver
 Asset Analysis & Recovery

January 15, 2024
 Client: 177110
 Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/01/23	JOH	Attend to two clawback claims; Email legal counsel re various matters	.70	311.50
10/02/23	JOH	Attend to three clawback actions; Email with legal counsel re various matters; Review pleadings	1.40	623.00
10/03/23	JOH	Attend to clawback action; Attend to claims process; Meet with legal counsel re various matters; Review pleadings and related documents and legal authorities	1.30	578.50
10/10/23	JOH	Attend to clawback action	.10	44.50
10/12/23	JOH	Preparing for and attending hearing; meetings with legal counsel; meeting with expert; meeting with clerk; attention to potential settlement of clawback action; meeting with party bringing claim	2.90	1,290.50
10/13/23	JOH	Attention to clawback action; emailing with legal counsel re potential mediation and related matters	.80	356.00
10/16/23	JOH	Attend to clawback action; Email with legal counsel re mediation logistics; Review email correspondence from CFTC	.70	311.50
10/18/23	JOH	Attend to clawback action	.30	133.50
10/23/23	JOH	Attend to clawback action; Review email correspondence with regulator	.30	133.50
10/25/23	JOH	Attend to two clawback actions; Review email correspondence re disposition of assets and related matters	.40	178.00
10/26/23	JOH	Attend to clawback action	.30	133.50
10/27/23	JOH	Attend to clawback action	.20	89.00
10/30/23	JOH	Attend to clawback action; Attend to potential asset sale	.50	222.50
11/02/23	JOH	Attention to two clawback actions; Call with legal counsel re case strategy and related matters	.90	400.50
11/08/23	JOH	Attention to clawback action; Call and Email with legal counsel re same	.90	400.50
11/09/23	JOH	Attention to clawback actions; Email with legal counsel re two settlement agreements; Review documents	1.10	489.50
11/17/23	JOH	Follow up re tax matters; Attention to clawback action	.40	178.00
11/21/23	JOH	Attention to potential settlement negotiations	.30	133.50
11/27/23	JOH	Attention to two clawback actions; Meeting with legal counsel re potential settlement; follow up re bankruptcy matter; Reviewing related email correspondence	1.40	623.00
12/05/23	JOH	Review documents; Attention to clawback action; Meet and Email with legal counsel re various matters	1.40	623.00
12/06/23	JOH	Attention to bankruptcy proceeding; Follow up re clawback action; Communicate with legal counsel re same; Follow up re mediation of appeal	1.30	578.50
12/07/23	JOH	Attention to two clawback actions; Review documents relating to same; Review proposed settlement agreement; Follow up with legal counsel re same	1.40	623.00
12/12/23	JOH	Attention to clawback action; Email with legal counsel re same	.30	133.50

PARR BROWN GEE & LOVELESS

Invoice: 938387
 Rust Rare Coin Receiver
 Asset Analysis & Recovery

January 15, 2024
 Client: 177110
 Matter: 2

Date	Tkpr	Description	Hours	Amount
12/13/23	JOH	Attention to clawback action; Attention to incoming payment for Zions Class Action; Follow up with legal counsel re same; Follow up on potential sale of IP; Review pleadings	1.40	623.00
12/19/23	JOH	Meet with legal counsel re various matters; Attention to three clawback actions; Review documents	1.80	801.00
12/21/23	JOH	Attention to two clawback actions; Review documents	1.00	445.00
12/31/23	JOH	Review settlement agreement; Email with counsel re same	.40	178.00
TOTAL PROFESSIONAL SERVICES				\$ 10,635.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	445.00	23.90	10,635.50
TOTALS		23.90	\$ 10,635.50

COSTS ADVANCED

Date	Description	Amount
10/12/23	Salt Lake City Parking - Jonathan Hafen parking	4.50
TOTAL COSTS ADVANCED		\$ 4.50
TOTAL THIS INVOICE		\$ 10,640.00

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

January 15, 2024

Rust Rare Coin Receiver

Invoice: 938387
Client: 177110
Matter: 2

REMITTANCE ADVICE

RE: Assett Analysis & Recovery

BALANCE DUE THIS INVOICE

\$ 10,640.00

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

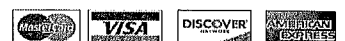
Routing #: 124001545
Account #: 912454114

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

Please reference your invoice # 938387

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

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Rust Rare Coin Receiver

January 15, 2024

Invoice: 938391
Client: 177110
Matter: 3

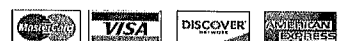
INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Disposition of Assets

Professional Services	\$ 1,780.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 1,780.00



PARR BROWN GEE & LOVELESS

Invoice: 938391
 Rust Rare Coin Receiver
 Disposition of Assets

January 15, 2024
 Client: 177110
 Matter: 3

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
11/06/23	JOH	Attention to potential sale of property; Follow up re status of clawback action; Email with legal counsel re same	.40	178.00
11/16/23	JOH	Attention to claim regarding sale of coin collection; Follow up with legal counsel re same	.20	89.00
12/11/23	JOH	Attention to potential asset sale; Review documents relating to clawback action	.40	178.00
12/15/23	JOH	Attention to sale of property; Review documents and related email correspondence concerning clawback action	.60	267.00
12/20/23	JOH	Attention to potential asset sale; Follow up re clawback action	.80	356.00
12/27/23	JOH	Attention to sale of IP; Follow up re distribution to claimants; Review documents and relating email correspondence from legal counsel; Email with legal counsel re upcoming mediation; Further review of distribution letter to claimants; Email with legal counsel re same; Review documents	1.60	712.00

TOTAL PROFESSIONAL SERVICES \$ 1,780.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	445.00	4.00	1,780.00
TOTALS		4.00	\$ 1,780.00

TOTAL THIS INVOICE \$ 1,780.00

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

Rust Rare Coin Receiver

January 15, 2024

Invoice: 938391
Client: 177110
Matter: 3

REMITTANCE ADVICE

RE: Disposition of Assets

BALANCE DUE THIS INVOICE

\$ 1,780.00

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**

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

Rust Rare Coin Receiver

January 15, 2024

Invoice: 938392
Client: 177110
Matter: 5

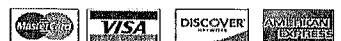
INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Claims Administration

Professional Services	\$ 3,871.50
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 3,871.50



PARR BROWN GEE & LOVELESS

Invoice: 938392
 Rust Rare Coin Receiver
 Claims Administration

January 15, 2024
 Client: 177110
 Matter: 5

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/06/23	JOH	Attend to claims matters; Follow up with legal counsel re same; Prepare for hearing; Attend to clawback action; Follow up with legal counsel re same	1.60	712.00
10/31/23	JOH	Reviewing and revising report; emailing with legal counsel re same; follow up re status of distribution to victims and creditors; reviewing documents relating to claims	1.70	756.50
11/01/23	JOH	Attention to four clawback actions; prepare for and attend meeting with legal counsel and accounting expert re various matters; review documents related to claims	2.30	1,023.50
12/08/23	JOH	Follow up re status of distribution; Email with legal counsel re same; Attention to clawback action; Review documents	1.40	623.00
12/26/23	JOH	Attention to clawback action; Email with legal counsel re upcoming mediation and related matters; Review and revise correspondence to claimants; Email with legal counsel re same; Review documents	1.70	756.50

TOTAL PROFESSIONAL SERVICES **\$ 3,871.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	445.00	8.70	3,871.50
TOTALS		8.70	\$ 3,871.50

TOTAL THIS INVOICE **\$ 3,871.50**

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

January 15, 2024

Rust Rare Coin Receiver

Invoice: 938392
Client: 177110
Matter: 5

REMITTANCE ADVICE

RE: Claims Administration

BALANCE DUE THIS INVOICE

\$ 3,871.50

Please return this advice with payment to:

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

Wire Transfer Instructions

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Salt Lake City, UT 84111-2870
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E-Check

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

EFT/ACH Pay Instructions

Routing #: 124001545
Account #: 912454114

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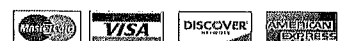


EXHIBIT B

EXHIBIT B

TWENTY-FIRST INTERIM FEE APPLICATION

Time Records of Parr Brown

EXHIBIT B

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

Rust Rare Coin Receivership

January 15, 2024

Invoice: 938382
Client: 176430
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration of Receivership Estate

Professional Services	\$ 7,207.50
Total Costs Advanced	<u>\$ 344.26</u>
TOTAL THIS INVOICE	\$ 7,551.76

PARR BROWN GEE & LOVELESS

Invoice: 938382
 Rust Rare Coin Receivership
 Administration of Receivership Estate

January 15, 2024
 Client: 176430
 Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/03/23	WOP	No Charge - Review attorney time sheets in preparation for fee application and quarterly report; Review and redact the same	3.80	N/C
10/04/23	WOP	Draft quarterly report; Review docket history; Call with various attorneys re same	4.40	1,232.00
10/09/23	WOP	Continue review and revisions of time sheets; Continue draft of quarterly report	4.10	1,148.00
10/11/23	WOP	Continue draft of quarterly report	1.70	476.00
10/12/23	JMC	Correspond with Lori Stumpf re TuneCore payment	.30	127.50
10/13/23	JMC	Review deposits in Rust case; Correspond with Kathy Bates re the same	.20	85.00
10/17/23	JMC	Correspond with Jeff Balls re restitution order and Josh and Denise Rust judgments; Review payments from Denise Rust	.90	382.50
10/17/23	WOP	Continue draft of quarterly report	2.40	672.00
10/19/23	WOP	No Charge - Review and redact time sheets for fee application; Correspond with BRG re same; Review docket report; Call with attorney re status of distribution	4.20	N/C
10/19/23	WOP	Continue draft of reports; Review claims registry	1.80	504.00
10/23/23	WOP	No Charge - Correspond with Caralee re printing new time sheets for fee application	.20	N/C
10/23/23	WOP	Complete draft of quarterly report; Create exhibits; Correspond with Kathy re ledger; Review ledger; Correspond with Joe re same	3.40	952.00
10/24/23	JMC	Correspond with Jeff Balls re Josh Rust and Denise Rust collection, recent claims decisions and related issues; Review and revise quarterly receiver report	1.30	552.50
10/24/23	WOP	No Charge - Perform additional review of attorney time sheets for those sheets that were destroyed for fee application	2.40	N/C
10/25/23	JMC	Correspond with Walter Peterson re quarterly report	.30	127.50
10/25/23	WOP	No Charge - Draft third quarter fee application	2.80	N/C
10/30/23	WOP	No Charge - Correspond with BRG and Conflict Receiver re fee application	.40	N/C
10/31/23	JMC	Correspond with Jon Hafen re quarterly report; Prepare report for filing	.60	255.00
10/31/23	WOP	No Charge - Continue draft of fee application	3.30	N/C
11/01/23	WOP	No Charge - Redact attorney time sheets again; Correspond with Caralee re same; Correspond with BRG re time sheets	3.40	N/C
11/03/23	JMC	Review weekly deposits	.10	42.50
11/07/23	WOP	No Charge - Continue work on fee application	1.80	N/C
11/13/23	WOP	No Charge - Correspond with BRG; Review and redact time records; Review docket; Continue draft of fee application	4.40	N/C
11/20/23	WOP	No Charge - Continue review of exhibits for fee application; Correspond with BRG re same	2.70	N/C

PARR BROWN GEE & LOVELESS

Invoice: 938382
 Rust Rare Coin Receivership
 Administration of Receivership Estate

January 15, 2024
 Client: 176430
 Matter: 1

Date	Tkpr	Description	Hours	Amount
11/22/23	JMC	Review weekly deposits	.10	42.50
12/04/23	JMC	Correspond with Ray Strong, Jeff Balls, Michael Hoppe and others re expert report in Larsen litigation	1.00	425.00
12/04/23	WOP	No Charge - Correspond with Jeff Shaw re narrative for fee application; Re-create exhibits reflecting updated billing numbers; Call with Joe Covey; Draft proposed order; Finalize draft of fee application	4.60	N/C
12/05/23	JMC	No Charge - Correspond with Jeff Balls re fee application	.10	N/C
12/06/23	JMC	No Charge - Correspond with Jeff Balls re fee application	.10	N/C
12/06/23	JAB	No Charge - Review attorney fees application; Correspond with Jonathan Hafen re same	.70	N/C
12/06/23	WOP	No Charge - Correspond with Jeff Balls re fee application; Review comments to the same; Revise fee application	.90	N/C
12/07/23	JMC	No Charge - Correspond with Jeff Balls re fee application	.10	N/C
12/08/23	JMC	No Charge - Review and revise order on fees; Correspond with the government re the same	.20	N/C
12/12/23	JMC	No Charge - Correspond with Jennifer Karb re fee application	.10	N/C
12/13/23	JMC	No Charge - Correspond with Jeff Balls re fee application	.10	N/C
12/13/23	JAB	No Charge - Review application for attorney fees; Conference with Walter Peterson re same; Conference with Joseph Covey re same	.60	N/C
12/14/23	JAB	No Charge - Review order for payment; Calculate attorney fees	1.00	N/C
12/20/23	JMC	No Charge - Review fee application and order	.20	N/C
12/21/23	WOP	Email correspondence with Jeff Shaw and Lori Stump	.20	56.00
12/27/23	JMC	Review distribution letter; Correspond with Jeff Balls re transfer of digital rights	.30	127.50

TOTAL PROFESSIONAL SERVICES \$ 7,207.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	425.00	5.10	2,167.50
Walter O Peterson	280.00	18.00	5,040.00
TOTALS		23.10	\$ 7,207.50

COSTS ADVANCED

Date	Description	Amount
10/16/23	ICU Investigations - Service of Motion and Order upon Bruce Roberts	87.50
10/21/23	Grasshopper.com	19.67
11/21/23	Grasshopper.com	19.67
11/30/23	ICU Investigations - Service of Motion and Order Upon Bruce Roberts	101.75
12/21/23	Grasshopper.com	19.67
12/22/23	ICU Investigations - Service of Motion and Order Upon Bruce Roberts	96.00

PARR BROWN GEE & LOVELESS

Invoice: 938382
Rust Rare Coin Receivership
Administration of Receivership Estate

January 15, 2024
Client: 176430
Matter: 1

TOTAL COSTS ADVANCED	\$ 344.26
TOTAL THIS INVOICE	\$ 7,551.76

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

January 15, 2024

Rust Rare Coin Receivership

Invoice: 938382
Client: 176430
Matter: 1

REMITTANCE ADVICE

RE: Administration of Receivership Estate

BALANCE DUE THIS INVOICE

\$ 7,551.76

Please return this advice with payment to:

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

Wire Transfer Instructions

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201 South Main St Ste 300
Salt Lake City, UT 84111-2870
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Rust Rare Coin Receivership

January 15, 2024

Invoice: 938383
Client: 176430
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Asset Analysis & Recovery

Professional Services	\$ 212,556.50
Total Costs Advanced	<u>\$ 710.10</u>
TOTAL THIS INVOICE	\$ 213,266.60



PARR BROWN GEE & LOVELESS

Invoice: 938383
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

January 15, 2024
 Client: 176430
 Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/01/23	RGW	Email with Jonathan Hafen re CFTC issue	.10	45.00
10/02/23	JMC	Correspond with Matt Boley re Howell appeal; Correspond with Ray Strong re expert reports in Larsen matter; Review discovery time line	.90	382.50
10/02/23	MTH	Review correspondence re Larsen case schedule	.10	40.50
10/02/23	MJB	(Hafen v. Howell) Correspond with Matt Boley (0.1)	.10	39.00
10/02/23	JAB	Review correspondence re mediation; Correspond with Peter Guyon	1.10	407.00
10/02/23	WOP	Review payments history for purchase of music intellectual property; Call re same; Research release of claims for principal	4.40	1,232.00
10/02/23	CMM	Call with claimant to discuss various claw back actions and timeline; Draft responses to Guyon motions; Review Guyon motions	5.60	1,456.00
10/02/23	CBB	Discuss Percell settlement with Jon Hafen and opposing counsel	.30	88.50
10/02/23	RGW	Emails with Thomas Melton re Guyon memoranda; Review and revise memoranda	3.10	1,395.00
10/02/23	TMM	Revise responses to Motions to Dismiss; Review Donnell analysis; Telephone conversation with Robert Wing re same	5.50	2,475.00
10/03/23	JAB	Review settlement offer; Correspond with Tom Melton; Review relevant pleadings	.70	259.00
10/03/23	CMM	Attorney conference with Jeffery Balls re responses to Guyon motions to dismiss; Review and revise oppositions to various motions to dismiss; Communicate with opposing counsel in bankruptcy Nelson matter; Research BR7004(g); Communicate internally re the same	4.20	1,092.00
10/03/23	TMM	Review and revise response to Guyon motions to dismiss	3.20	1,440.00
10/04/23	RMB	Review status of Dolores Batalla settlement payments; Review Rico investment group analysis	.80	324.00
10/04/23	MTH	Review and respond to correspondence from Claire McGuire re Nelson matter	.10	40.50
10/04/23	CMM	Research service requirements; Internal communications re the same in the Nelson matter; Communicate with opposing re the same; Review motion filed by Guyon re declaratory judgement; Communicate internally re the same; Draft response; Revise motion submitting objections of claimants	7.30	1,898.00
10/04/23	RGW	Email to Mark Pugsley re proposed settlement in Woodfin; Review submission re lodged document; Review default motion by Guyon	1.50	675.00
10/04/23	TMM	Revise Guyon response to motions to dismiss; Review Guyon motion for default	3.70	1,665.00
10/05/23	RMB	Further preparation of Jeff Shaw declaration for Larry Milligan default judgment and review Larry Milligan investment related documents	1.20	486.00
10/05/23	MTH	Conference with Claire McGuire re Darren Nelson case and Rick Larsen case	.20	81.00
10/05/23	JAB	Conference with Robert Wing re Guyon matter; Review opposition to motion to certify	.30	111.00

PARR BROWN GEE & LOVELESS

Invoice: 938383
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

January 15, 2024
 Client: 176430
 Matter: 2

Date	Tkpr	Description	Hours	Amount
10/05/23	CMM	Draft motion responding to motion for declaratory judgement; Revise various motions to dismiss based on the same; Finalize and prepare for filing motion responding to motion for declaratory judgment in Guyon matter; Revise per comments from Robert Wing; Coordinate filing of motion re the same	6.80	1,768.00
10/05/23	RGW	Prepare responses to Guyon motions; Emails and calls with Tom Melton re same; Emails with Claire McGuire re same	5.70	2,565.00
10/05/23	TMM	Review research re declaratory judgment; review draft of motion in response to motion for default	3.70	1,665.00
10/06/23	MTH	Review and respond to correspondence from Joe Covey re Darren Nelson case	.10	40.50
10/06/23	JAB	Review settlement offer; Correspond with Robert Wing re same; Conference with Jonathan Hafen; Correspond with Peter Guyon	1.30	481.00
10/06/23	CMM	Review new deposition transcripts; Draft fact section for summary judgement motion; Review discovery re the same; Revise and bluebook motion to respond to Guyon dismissal motions; Prepare the same for filing	8.20	2,132.00
10/06/23	RDR	[Guyon] Telephone conferences with Claire McGuire re filing oppositions to motion to dismiss, motion to dismiss for lack of jurisdiction, and motion to dismiss on statute of limitations grounds; Review and edit the three opposition motions for citation and legal accuracy; File the three opposition motions	2.10	546.00
10/06/23	RGW	Emails with Claire McGuire re additions to Guyon memos; Review Woodfin counter-offer; Conference with Jeff Balls re same	2.20	990.00
10/06/23	TMM	Review and revise Opposition to Guyon Motion to Dismiss; emails re same	1.30	585.00
10/09/23	JMC	Correspond with Jeff Balls re the claims objection hearing and treatment of claims issues	2.20	935.00
10/09/23	RMB	Conference with Jeff Balls re Guadalupe Valencia settlement; Review email correspondence file and Guadalupe Valencia settlement agreement	.60	243.00
10/09/23	CMM	Communicate re new Gaylen transcript; Review litigation deadlines in Larsen clawback; Draft motion for summary judgment argument section; Research issues of reasonably equivalent value	6.80	1,768.00
10/10/23	JMC	Correspond with Claire McGuire re service of complaint in Darren Nelson adversary proceeding; Correspond with Darren Nelson's counsel; Review service issues; Correspond with Jory Trease re the same	1.40	595.00
10/10/23	MTH	Review correspondence from opposing counsel and Jeff Balls re hearing and Larsen matter; Review correspondence from opposing counsel in Darren Nelson matter	.20	81.00
10/10/23	MTH	Review correspondence from Joe Covey re Darren Nelson matter and conference with Joe Covey re same	.30	121.50

PARR BROWN GEE & LOVELESS

Invoice: 938383
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

January 15, 2024
 Client: 176430
 Matter: 2

Date	Tkpr	Description	Hours	Amount
10/10/23	JAB	Correspond with Joe re Denise Rust settlement; Correspond with Jeff Shaw re depositions; Correspond with Peter Guyon re settlement	3.60	1,332.00
10/10/23	CMM	Attorney conference with Robert Wing re various claw back actions; Draft initial disclosures; Draft opposition to motion to dismiss; Communicate with claimant re payment of claim; Communicate with opposing counsel in bankruptcy matter re service and extension; Research and send Larsen discovery requests	8.80	2,288.00
10/10/23	CMM	Research issues related to objections and furlough date; Attorney meeting with Cheylynn Hayman re the same; Draft summary of the same	1.20	312.00
10/10/23	TMM	Research and draft opposition to Motion to Certify; review prior cases re same	5.20	2,340.00
10/11/23	JMC	Review docket for new pleading filed in ancillary proceeding; Correspond with Jory Trease re Darren Nelson lawsuit and bankruptcy proceeding	.40	170.00
10/11/23	MJB	(Hafen v. Howell) Research and draft reply memorandum in support of motion to certify (3.3)	3.30	1,287.00
10/11/23	JAB	Email claimants re court hearing; Conference with Robert Wing re claims and settlements; Telephone conference with Ray Strong re depositions	2.90	1,073.00
10/11/23	CMM	Draft argument section of motion for partial summary judgment; Draft motion for overlength and coordinate exhibits for opposition to motion to certify questions from Guyon; Review motion to certify; Review communications with opposing counsel in Nelson matter	6.80	1,768.00
10/11/23	CBB	In Percell matter: Review emails from opposing counsel re settlement amount and form of payment; Draft and revise settlement agreement; Draft and revise confession of judgment; Draft and revise final judgment and order; Draft and revise joint motion to approve settlement; Provide documents to opposing counsel and request signatures	5.30	1,563.50
10/11/23	RGW	Review response to motion to certify; Emails with Thomas Melton re same; Research re same; Prepare response to Woodfin offer	3.20	1,440.00
10/11/23	TMM	Research prior motions to certify in other Rust fraudulent transfer actions	3.40	1,530.00
10/12/23	JMC	Correspond with Jory Trease and others re bankruptcy proceedings	.70	297.50
10/12/23	WOP	Continue review of payment records; Correspond with BRG re same	2.10	588.00
10/12/23	CMM	Review and revise mediation statement	.80	208.00
10/12/23	CBB	Review Utah substantive and Federal procedural law re transferal of litigation liabilities to estate upon death of defendant in support of drafting motion for substitution of party; Draft and revise motion for substitution of party	5.10	1,504.50
10/12/23	RGW	Revise memo re Ponzi scheme presumption; Update research re same; Call with Tom Melton re same; Prepare for Oberhansly mediation	3.10	1,395.00
10/12/23	TMM	Draft opposition to Motion to Certify	3.70	1,665.00
10/13/23	JAB	Review reply in support of motion to certify judgment	.50	185.00

PARR BROWN GEE & LOVELESS

Invoice: 938383
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

January 15, 2024
 Client: 176430
 Matter: 2

Date	Tkpr	Description	Hours	Amount
10/13/23	CMM	Draft and revise opposition to motion to certify	2.60	676.00
10/13/23	CBB	In Wells claw back action: Review voidable transactions act for discussion or guidance on transferal of claims; Review precedent for instances where claims are extinguished upon decedent's death; Review Utah and Federal law re proper party for transfer of case; Review law re required service of motion for substitution of party; Review Hafen v. Wade to avoid dismissal reasons; Review probate court order re Bruce Roberts's appointment as personal representative of estate	5.90	1,740.50
10/13/23	CBB	Draft and revise motion for substitution of party; Draft and revised proposed order granting motion; Review past filings for Bruce Roberts's address; Effectuate filing of motion and proposed order, and service of both	2.80	826.00
10/13/23	TMM	Draft opposition to Motion to Certify	4.00	1,800.00
10/16/23	JMC	Correspond with Ray Strong re expert	.10	42.50
10/16/23	MJB	(Hafen v. Howell) Revise reply memorandum in support of motion to certify judgment (0.1); Correspond with Joe Covey (0.1)	.20	78.00
10/16/23	CMM	Review rust deposits and current settlement agreements; Communicate with opposing counsel re settlement	.50	130.00
10/16/23	CMM	Revise and file opposition to motion to certify questions; Attorney conference with Robert Wing and Thomas Melton re the same	4.00	1,040.00
10/16/23	CBB	In Wells matter, work with staff to get motion to substitute party filed; Discuss internally service of motion on non-party to be substituted	.40	118.00
10/16/23	CBB	In Percell matter: review docket and scheduling order; Discuss joint status report with opposing counsel; Draft and revise joint status report; Discuss draft with opposing counsel; Finalize joint status report; Effectuate filing of joint status report; Review opposing counsel's feedback and suggestions in settlement agreement and consent judgment; Discuss revisions, execution, and dismissal paperwork with opposing counsel; Review docket and case status	3.20	944.00
10/16/23	CY	Draft motion for overlength for Pete Guyon	.50	77.50
10/16/23	RGW	Email with Claire McGuire re certification response memo; Review memo	.40	180.00
10/17/23	JMC	Correspond with Jeff Balls and Rodger Burge re clawback actions and upcoming meeting	.30	127.50
10/17/23	RMB	Conference with Joe Covey and Jeff Balls re Lugli investor group clawback claims and strategy	.20	81.00
10/17/23	JAB	Conference with Joseph Covey re Josh Rust; Conference with Robert Wing; Review bank register for payments; Review settlements	4.30	1,591.00
10/17/23	CMM	Communicate internally re sale of home and settlement agreement; Review edits to settlement agreement sent by opposing counsel; Revise final motion	3.20	832.00

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10/18/23	JMC	Correspond with Ray Strong, Jeff Balls and Jeff Shaw re Larsen expert report; Review and analyze Howell reply brief; Correspond with Matt Ball re the same	4.10	1,742.50
10/18/23	MJB	(Hafen v. Howell) Revise reply memorandum (0.2)	.20	78.00
10/18/23	JAB	Draft email to CFTC re settlements; Review documents re recoveries; Conference with Joseph Covey; Conference with Claire McGuire	2.10	777.00
10/18/23	JAB	Review claims registry	2.70	999.00
10/18/23	CMM	Review and revise motion lodging additional evidence; Research appraisal and settlement agreement	5.20	1,352.00
10/19/23	RMB	Review Miriam Martinez, Luisa Marquez correspondence file and default materials	.80	324.00
10/19/23	MJB	Telephone conference with Susan Ensslin (0.1)	.10	39.00
10/19/23	JAB	Review messages on website; Respond to parties	1.10	407.00
10/19/23	CMM	Negotiate settlement agreement with opposing counsel; Draft motion for partial summary judgment for Larsen matter; Review discovery in Larsen matter	9.20	2,392.00
10/20/23	RMB	Review Lugli file documents from Lugli group counsel; Review Mike Johnson analysis and documents for dismissal purposes	1.40	567.00
10/20/23	CMM	Review Guyon reply in support of to lack of jurisdiction motion; Review Guyon reply to declaratory judgement motion; Review Guyon reply in support of motion to dismiss for failure to state a claim; Communicate with Thomas Melton re the same	3.60	936.00
10/20/23	TMM	Review reply motions re Motion to Dismiss	2.50	1,125.00
10/20/23	TMM	Review, revise and file Opposition to Motion to Dismiss	4.30	1,935.00
10/21/23	JMC	Correspond with Steve McCardell re settlement	.10	42.50
10/23/23	JMC	Correspond with Jeff Balls re various clawback issues and information to the government	.20	85.00
10/24/23	JMC	Correspond with Michael Hoppe and Claire McGuire re Larsen lawsuit, expert report and related issues	.50	212.50
10/24/23	MTH	Telephone conference with Joe Covey re Larsen matter	.30	121.50
10/24/23	MJB	(Hafen v. Howell) Correspond with Denise McClure (0.1); Draft request to submit (0.2)	.30	117.00
10/24/23	JAB	Draft settlement agreement; Correspond with Thomas Simek; Review correspondence re appellate mediation; Review judgments against Rust defendants	3.70	1,369.00
10/24/23	CBB	In Wells claw back action, review past filings in claw back action and probate action, review contact information for Bruce Roberts; Draft and send email update and status request to Bruce Roberts	.50	147.50
10/25/23	JMC	Correspond with Jeff Balls re clawback settlement agreement terms; Correspond with Michael Hoppe and Claire McGuire re Larsen expert report, summary judgment and related issues	5.90	2,507.50
10/25/23	MTH	Conference with Joe Covey re summary judgment motion in Larsen matter	.10	40.50

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10/25/23	JAB	Review settlement agreement; Review inventory; Telephone conference with CFTC and Joseph Covey re matters; Telephone conference with Jeff Shaw	4.80	1,776.00
10/25/23	CMM	Review and gather all discovery produced in the Larsen matter for expert reports; Review Hashimoto report	2.70	702.00
10/26/23	JAB	Review correspondence re mediation; Review status of clawbacks; Correspond with Matthew Barneck	.90	333.00
10/26/23	CMM	Review documents in Larsen matter; Communicate about managing the same with Crista Yancey; Communicate with claw back target re settlement; Research potential claw back action	6.10	1,586.00
10/26/23	CY	Communicate with Claire McGuire re managing documents for Larsen matter	.20	31.00
10/27/23	RMB	Review Guadalupe Valencia file; Conference with Jeff Balls re status of Guadalupe Valencia settlement; Prepare email to Brandon Smith re final settlement payment from Guadalupe Valencia	.60	243.00
10/27/23	JAB	Review settlement agreement; Review motion to amend scheduling order; Email Matthew Barneck re same; Review clawback actions	1.10	407.00
10/27/23	TMM	Research re Guyon Second Motion to Dismiss; Review cases in Second Motion	4.50	2,025.00
10/30/23	JMC	Review several filings in clawback actions; Begin review of expert report	.30	127.50
10/30/23	RMB	Review of Lugli investment related documents in connection with preparation for strategic planning meeting with Jon Hafen and assessing potential value of claw-back claims	3.40	1,377.00
10/30/23	MTH	Review draft report of Jeffrey Shaw and correspond with legal team re same	.30	121.50
10/30/23	JAB	Review Jeff Shaw Declaration; Review FBI files; Review invoices for Zions class action; Correspond with Paul Scarlato; Review settlement offer; Correspond with Judson Pitts; Review Ault complaint	5.50	2,035.00
10/30/23	CMM	Research complaint against claw back defendant and settlement agreement of the same; Draft complaint; Attorney conference with Jeffery Balls re complaint and issues associated with expert report; Attorney conference re delay in settlement agreement; Communication with accounting re late settlement payment	6.80	1,768.00
10/30/23	CBB	In Percell claw back action, review history of communications with opposing counsel and follow up re settlement agreement; Review and respond to email from opposing counsel and follow up with settlement status	.30	88.50
10/30/23	TMM	Review Guyon reply to Motion to Certify; Draft response to Guyon Second Motion to Dismiss	3.70	1,665.00
10/31/23	JMC	Review and analyze expert report in Larsen; Correspond with Jeff Balls and other re the same	.50	212.50

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10/31/23	RMB	Further review of Lugli investment group documents for purposes of analyzing potential claw-back claim amounts and correspondence and agreements with Rust Rare Coin; Review Terri Andreini file and Andreini investment group related documents	2.80	1,134.00
10/31/23	MTH	Review and respond to correspondence from legal team re expert report in Larsen matter	.10	40.50
10/31/23	JAB	Review supplemental expert report of Jeffrey Shaw; Telephone conference with Jeffrey Shaw; Review litigation status; Conference with Claire McGuire re Ault complaint	3.30	1,221.00
10/31/23	CMM	Review supplemental report from expert; Serve the same on opposing parties; Review supplemental expert report sent by opposing counsel	3.90	1,014.00
10/31/23	RGW	Research re Guyon response issue whether fraudulent transfer claims are considered a tort	.80	360.00
10/31/23	TMM	Draft Response to Guyon Second Motion to Dismiss; Telephone conference with Robert Wing re same and nature of fraudulent conveyance claims	4.50	2,025.00
11/01/23	JMC	Review and analyze Mark Hashimoto supplemental expert report; Correspond with Claire McGuire, Michael Hoppe and Jeff Balls re the same	1.30	552.50
11/01/23	RMB	Review Lugli investment group investment documents in connection with preparation for strategy meeting with Receiver and analyses prepared for potential claw-back claims; Meet with Jon Hafen, Jeff Balls and Jeff Shaw re Lugli investment group potential claw-back claims	4.40	1,782.00
11/01/23	MTH	Review supplemental expert report from Larsen; correspond with legal team re case strategy	.30	121.50
11/01/23	MTH	Review and respond to correspondence from team re expert reports in Larsen matter	.10	40.50
11/01/23	MTH	Review and respond to correspondence from experts and legal team re meeting	.10	40.50
11/01/23	MTH	Review correspondence from opposing counsel and correspondence from legal team re mediation and case strategy	.10	40.50
11/01/23	JAB	Review supplemental expert report of Mark Hashimoto; Conference with Jeff Shaw, Jonathan Hafen, and Rodger Burge; Review settlement payment status	3.20	1,184.00
11/01/23	CMM	Revise Ault complaint to include new cause of action; Research the same; Review and draft summary of new Hashimoto report in Larsen matter	5.60	1,456.00
11/01/23	RGW	Review counteroffer in Woodfin; Email to Jonathan Hafen re same	.90	405.00
11/02/23	JMC	Correspond with Michael Hoppe, Ray Strong, Jeff Balls and Claire McGuire re Larsen, expert rebuttal report, summary judgment motion and related issues; Review and analyze Hashimoto supplemental expert report	1.90	807.50
11/02/23	MTH	Review correspondence from experts and correspond with Claire McGuire re Larsen matter	.10	40.50

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11/02/23	MTH	Review and respond to correspondence from Claire McGuire re meeting in Larsen matter	.10	40.50
11/02/23	MTH	Prepare for attend meeting with experts (BRG) in Larsen matter (1.7)	1.70	688.50
11/02/23	JAB	Review expert report of Mark Hashimoto; Analyze facts re Larsen matter; Review and coordinate clawback actions; Correspond with Dominic Shaw; Telephone conference with Judson Pitts; Review settlement agreements; Conference with BRG and receiver team re rebuttal expert report	5.70	2,109.00
11/02/23	CMM	Review expert reports for Larsen matter; Meet with experts Ray Strong and Jeff Shaw with Parr Brown team to discuss rebuttal report; Draft new scheduling motion and order; Communicate with experts re access to documents; Draft initial disclosures and gather documents for the same	6.30	1,638.00
11/02/23	CBB	Review and respond to email from opposing counsel re settlement documents in Percell matter	.20	59.00
11/02/23	TMM	Research and draft response to Guyon second motion to dismiss	2.30	1,035.00
11/03/23	JMC	Correspond with Ray Strong re rebuttal expert report; Correspond with James Tracy re rebuttal reports	.20	85.00
11/03/23	JAB	Review settlement payments; Correspond with Jonathan Hafen;	2.20	814.00
11/03/23	CMM	Review communications with experts re upcoming report deadlines; Review expert report and potential rebuttal report topics; Research for summary judgement motion	4.20	1,092.00
11/06/23	MTH	Review correspondence from counsel for Larsen and correspond with Receiver legal team re same	.10	40.50
11/06/23	MTH	Review and respond to correspondence from Jeff Balls re Larsen matter; Conference with Claire McGuire re Flint matter	.30	121.50
11/06/23	JAB	Research writ of attachment; Correspond with Jonathan Hafen; Review order from Tenth Circuit; Conference with Claire McGuire; Draft motion to approve Tyler Thurgood settlement	4.30	1,591.00
11/06/23	CMM	Review correspondence with opposing counsel re mediation of Larsen clawback and extension; Attorney conference with Jeffery Balls and Michael Hoppe re settlement negotiations and upcoming summary judgment filing; Draft communication with potential claw back claim	2.80	728.00
11/06/23	CBB	Discuss Percell settlement agreement internally and effectuate retrieval of hard signed copy form from opposing counsel	.30	88.50
11/06/23	CY	Research missing production for Larsen Clawback	.40	62.00
11/07/23	JMC	Correspond with Claire McGuire re Larsen expert report, summary judgment, mediation and related issues; Correspond with James Tracy re the mediation and expert reports; Correspond with Matt Ball re Howell certification	1.70	722.50
11/07/23	MTH	Review correspondence from Claire McGuire to Kelly Flint re Flint matter	.10	40.50
11/07/23	JAB	Conference with Matt Ball; Review court order re certify amended judgment; Correspond with court clerk	.60	222.00

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11/07/23	CBB	Follow up with Jon Hafen re Percell settlement agreement	.10	29.50
11/07/23	CY	Continue researching missing production for Larsen Clawback; Download docs for RRC_Larsen production and native files; Email correspondence with Claire McGuire about missing discovery and other issues	3.20	496.00
11/07/23	RGW	Email to Mark Pugsley re Woodfin counteroffer	.20	90.00
11/08/23	JMC	Review and revise settlement agreement with Bary Jones; Correspond with Jeff Balls re the same; Correspond with Jon Hafen and Jeff Balls re the Larsen litigation and legal strategy issues	3.90	1,657.50
11/08/23	JAB	Correspond with Jonathan Hafen; Draft affidavit for attorney fees; Conference with Jonathan Hafen and Joseph Covey; Telephone conference with court clerk re certification of judgment	2.80	1,036.00
11/08/23	CY	Continue researching missing production for Larsen Clawback; Email Angelica Torres for missing RL production; Email correspondence with Claire McGuire re missing discovery; Add missing discovery requests to pleading index	3.80	589.00
11/08/23	RGW	Research re Guyon second motion to dismiss; Emails with Tom Melton re same; Work on response	3.50	1,575.00
11/09/23	JMC	Review recent filings in Darren Nelson bankruptcy case; Correspond with Steve McCardell and Jeff Balls re Bary Jones settlement	1.50	637.50
11/09/23	JAB	Review and revise Bary Jones settlement agreement; Review clawback actions; Correspond with Matthew Barneck re Taylor matter	2.50	925.00
11/09/23	CBB	Discuss Percell settlement agreement with Jon Hafen and staff; Discuss fully executed settlement agreement and stipulated motion to dismiss with opposing counsel; Finalize stipulated motion to dismiss; Draft and revise proposed order accompanying motion to dismiss; Effectuate filing	.90	265.50
11/09/23	CY	Continue reviewing docs for production	1.20	186.00
11/10/23	MJB	(Hafen v. Howell) Correspond with Joe Covey (0.1)	.10	39.00
11/10/23	JAB	Correspond with Jeff Shaw; Review litigation matters	5.10	1,887.00
11/10/23	RGW	Work on response to Guyon's second motion to dismiss	1.50	675.00
11/13/23	MJB	(Hafen v. Howell) Review court orders (0.1); Correspond with Michelle Gonsalves (0.1); Correspond with Susan Ensslin (0.1)	.30	117.00
11/13/23	JAB	Draft motion to approve settlement agreement with Tyler Thurgood; Review claw back actions; Review motion to dismiss from Guyon; Correspond with Robert Wing re same; Call Ryan Pahnke; Draft motion to amend scheduling order; Email Ryan Pahnke re same	6.60	2,442.00
11/13/23	CBB	Review and respond to case status report request from Jeff Balls; Review case docket, filings, and correspondence with opposing counsel in support of providing Jeff case status	.30	88.50
11/13/23	RGW	Work on response to Guyon's second motion to dismiss; Emails with Jeff Balls re same	3.50	1,575.00
11/14/23	MTH	Review correspondence from expert in Larsen matter	.10	40.50

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11/14/23	JAB	Review claw back actions; Draft affidavit of attorney fees	1.10	407.00
11/14/23	RGW	Continue work on response to Guyon's second motion to dismiss	2.20	990.00
11/15/23	RMB	Review Lugli group investment analyses and documents in connection with preparation for conference with Luglis re resolution of claims and any claw-back claims	.90	364.50
11/15/23	JAB	Conference with Joseph Covey; Review claw back actions	.90	333.00
11/15/23	CMM	Review motion to dismiss entered by claw back defendant	1.00	260.00
11/15/23	RGW	Revise response to Guyon Motion; Email with Claire McGuire re same	2.30	1,035.00
11/16/23	CMM	Review settlement agreements and upcoming discovery deadlines; Draft initial disclosures; Research issues and begin drafting summary judgement motion; Return investor call; Review disclosed expert report and pre judgement interest case law; Review and revise response motion to Guyon motion to dismiss; Attorney conference with Robert Wing re the same	7.40	1,924.00
11/17/23	RMB	Prepare Jeff Shaw Declaration for Andreini group default judgments; Prepare and revise motion for default judgment for Larry Milligan; Assess potential investments by Larry Milligan for purposes of determining default judgment and collection amounts and review relevant investment documents in connection therewith; Review Terry Jones investment activity and related documents	4.40	1,782.00
11/17/23	JAB	Draft motion for attorney fees; Review opposition to motion to dismiss	2.60	962.00
11/17/23	CMM	Review and summarize issues pertaining to Call Group claw back; Attorney conference with Robert Wing re the same; Review settlement offer from potential claw back defendants; Draft recommendation re the same	3.40	884.00
11/17/23	RGW	Review Call matter; Email to Tom Melton	.30	135.00
11/20/23	RMB	Review Lugli investor group investor file and documents; Research Terri Andreini and Mike Johnson communications with Rust Rare Coin; Prepare Motions for Default Judgment on Terry Jones and LeRay Andreini	3.30	1,336.50
11/20/23	JAB	Correspond with Judson Pitts; Draft motion to amend scheduling order; Draft motion for attorney fees; Email Paul Scarlato re same	2.30	851.00
11/20/23	CMM	Communicate with experts re upcoming reports and research documents for the same	1.20	312.00
11/20/23	CBB	In Percell matter, review record and docket, and draft and revise request for voluntary dismissal and accompanying proposed order	.90	265.50
11/21/23	JMC	Review and analyze answer in Darren Nelson lawsuit	.50	212.50
11/21/23	RMB	Review documentation for Modesto Security Deposit transactions in Lugli investor group; Review documents from Lugli group counsel in connection with evaluating potential claw-back claim and settlement strategy; Analyze LeRay Andreini investment documentation	3.30	1,336.50
11/21/23	MTH	Review correspondence re case dates	.10	40.50
11/21/23	JAB	Review order of dismissal; Review claw back actions; Review correspondence re claw back; Draft Shaw affidavit	1.60	592.00

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11/21/23	CBB	In Percell matter, effectuate filing of request for voluntary dismissal; Communicate with opposing counsel re order dismissing case without prejudice; Work with staff to re-file request and proposed order dismissing case with prejudice	.60	177.00
11/21/23	CBB	In Wells claw back action, review docket filings and case status; Review default procedure and applicable rules; Discuss default filings with colleague; Begin drafting and revising motion for summary judgment against Bruce Roberts; Review summary judgment motions from prior claw back actions	6.90	2,035.50
11/21/23	RGW	Emails with Mark Pugsley re Woodfin	.10	45.00
11/22/23	RMB	Review and revise declaration of Jeff Shaw for Larry Milligan and Terry Jones default judgments; Review Andreini investor group analyses and investment related documents	1.70	688.50
11/22/23	JAB	Review settlement payments; Review pleadings in Howell case	.20	74.00
11/22/23	CMM	Review Answer filed by Darren Nelson; Research issues raised including perjury standard and proof of claim; Review claims transfers	3.60	936.00
11/22/23	CBB	In Wells claw back action, draft and revise motion for summary judgment	1.70	501.50
11/22/23	RGW	Call with Mark Pugsley re Woodfin offer and counteroffer	.30	135.00
11/27/23	JMC	Correspond with Michael Hoppe re Darren Nelson answer and related issues	.30	127.50
11/27/23	RMB	Review and respond to email from Jeff Shaw re Terry Jones and Larry Milligan claw-back claims; Review investment documentation and analyze claw-back claim amounts for LeRay Andreini, the Estate of Gene Andreini, and Mike Johnson	2.50	1,012.50
11/27/23	MTH	Review and evaluate answer to complaint in Darren Nelson adversary proceeding; Correspond with Joe Covey and Claire McGuire re same	.90	364.50
11/27/23	MTH	Review and respond to correspondence from Joe Covey re Darren Nelson case	.10	40.50
11/27/23	MTH	Conference with Claire McGuire re Darren Nelson case	.20	81.00
11/27/23	JAB	Conference with Robert Wing; Telephone conference with Jeff Shaw; Correspond with Jeff Shaw	2.20	814.00
11/27/23	CMM	Review and research issues in Answer; Review issues with settlement agreement; Attorney conference with team re the same; Draft initial disclosures	4.80	1,248.00
11/27/23	CBB	In Wells matter, draft and revise motion for summary judgment	2.60	767.00
11/28/23	JMC	Correspond with Claire McGuire and others re Darren Nelson lawsuit and meeting	.40	170.00
11/28/23	RMB	Conference with Jeff Shaw re Larry Milligan and Terry Jones default judgments; Review and analyze Terri Andreini investment documents and correspondence from her legal counsel; Prepare settlement recommendation for Mike Johnson; Prepare LeRay Andreini and Estate of Gene Andreini default judgment motions	4.70	1,903.50

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11/28/23	MTH	Review and respond to correspondence from Tammy Frisbee and Claire McGuire in Darren Nelson BK case	.10	40.50
11/28/23	MTH	Review correspondence from opposing counsel in Rick Larsen matter and correspond with legal team re case strategy	.10	40.50
11/28/23	JAB	Telephone conference with Rodger Burge and Jeff Shaw re defaults; Conference with Joseph Covey; Telephone conference with James Tracy re amended scheduling order; Review settlement agreement for Jones entities	3.80	1,406.00
11/28/23	CMM	Review notices from the Court re transfer; Attorney conference with Robert Wing re the same; Call with Court re lack of assignment; Draft summary judgement motion; Communicate re Answer and discovery in Nelson matter	3.40	884.00
11/28/23	CBB	In Wells claw back: draft and revise motion for summary judgment; Review case pleadings and schedule; Email Jeff Shaw re expert report for Kayleen Roberts; Re-assess case strategy, check case deadlines, and email Jeff Shaw again	4.10	1,209.50
11/28/23	TMF	Review 28-page answer, confirming accuracy of disputed factual allegations in complaint and preliminary review of legal defenses raised	2.60	650.00
11/29/23	JMC	Meeting with Claire McGuire, Tammy Frisby and Michael Hoppe re Darren Nelson lawsuit, Discovery and legal strategy; Review bankruptcy docket and answer	1.00	425.00
11/29/23	RMB	Further review of Lugli investment and disbursement transactions and related documents; Analyze default judgment amounts for Adrian Alvarez and review Rico investment group documents and analyses for default judgment and settlement purposes	3.90	1,579.50
11/29/23	MTH	Correspond with Joe Covey and Claire McGuire re meeting re Nelson	.10	40.50
11/29/23	MTH	Meeting with Joe Covey, Claire McGuire and Tammy Frisbee re Nelson matter and Larsen matter	.80	324.00
11/29/23	JAB	Revise settlement agreement; Draft motion to extend deadlines; Correspond with James Tracy and Ryan Mitchell; Correspond with Matthew Barneck; Coordinate with Jeffrey Shaw	2.90	1,073.00
11/29/23	CMM	Attorney conference with Michael Hoppe, Tammy Frisby, and Joseph Covey re Nelson case and needed discovery; Draft and gather initial disclosures	3.00	780.00
11/29/23	CBB	In Wells claw back action: Review docket and operative scheduling order and order staying case; Draft and revise motion for entry of amended scheduling order, accompanying proposed order, and accompanying declaration; Compile exhibits for declaration and finalize motion and proposed order; Effectuate filing and service of motion and proposed order	5.70	1,681.50
11/29/23	TMF	Meet with team re Darren Nelson answer to nondischarge complaint and discovery scheduling	.80	200.00
11/30/23	JMC	Correspond with Claire McGuire re clawback litigation issues	.20	85.00

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11/30/23	MTH	Review and respond to correspondence from Claire McGuire re Flint Farms Trust; Draft case and settlement analysis for Receiver re Flint Farms Trust	.60	243.00
11/30/23	MTH	Review initial disclosures from Nelson in Nelson adversary proceeding; Correspond with legal team re Nelson matter	.30	121.50
11/30/23	JAB	Telephone conference with Jeff Shaw; Review Bary Jones matter	1.40	518.00
11/30/23	CMM	Draft scheduling order; Review initial disclosures; Negotiate settlement and review recommendation	2.30	598.00
11/30/23	TMF	Review Darren Nelson's initial disclosures	.20	50.00
11/30/23	RGW	Conference with Jeff Balls re Larsen issue	.50	225.00
12/01/23	RMB	Review status of Guadalupe Valencia settlement; Further review and analysis of Mike Johnson potential metals investment and analysis of values thereof; Further investigation and analysis of possible Larry Milligan investments and review file documents	2.30	931.50
12/01/23	MTH	Review correspondence from expert in Larsen matter and from Joe Covey re expert report	.10	40.50
12/01/23	MTH	Review and respond to correspondence from Claire McGuire re Flint Farms Trust; Correspond with Joe Covey re same; Review correspondence from expert in Larsen matter	.20	81.00
12/01/23	MTH	Meeting with Ray Strong and Jeff Shaw re rebuttal reports in Larsen matter	.60	243.00
12/01/23	JAB	Correspond with Ray Strong; Review expert reports; Review revisions to application for fees; Conference with Claire McGuire; Telephone conference with BRG and Michael Hoppe re expert reports; Conference with Chauncey Bird; Telephone conference with Jeff Shaw; Correspond with Steven McCardell re settlement; Review and revise settlement agreement	5.40	1,998.00
12/01/23	CMM	Review settlement offer from net winner; Attorney conference with Micheal Hoppe re the same; Prepare initial disclosures for Neslon case; Communicate re expert report with Ray Strong and Jeff Balls for expert disclosures to Larsen; Communicate with Jeff Balls re expert report and disclosures; Communicate re initial disclosures for Darren Nelson with Crista Yancey; Prepare the same for service	6.90	1,794.00
12/01/23	CY	Multiple email correspondence with Claire McGuire re expert reports; Download expert reports to T drive; Email correspondence with Ray Strong re missing expert report; Research Ray Strong July 2023 report	1.50	232.50
12/04/23	RMB	Review Miriam Matinez and Luisa Marquez claw-back claim file; Review Rico group analyses; Review Guadalupe Valencia settlement agreement	1.40	567.00
12/04/23	MTH	Review and respond to correspondence from Claire McGuire re initial disclosures in Nelson matter; Review initial disclosures in Nelson matter; Review and respond to correspondence from expert in Larsen matter	.60	243.00

PARR BROWN GEE & LOVELESS

Invoice: 938383
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

January 15, 2024
 Client: 176430
 Matter: 2

Date	Tkpr	Description	Hours	Amount
12/04/23	MTH	Review and revise initial disclosures in Nelson matter; Meeting with Ray Strong and Jeff Shaw re expert analysis in Larsen matter	1.40	567.00
12/04/23	MTH	Conference with Claire McGuire re initial disclosures	.10	40.50
12/04/23	MTH	Review correspondence from Claire McGuire re initial disclosures in Nelson matter and correspond with Joe Covey re same	.10	40.50
12/04/23	MTH	Review issues re Flint Farms Trust	.10	40.50
12/04/23	JAB	Review expert reports; Telephone conference with BRG and team; Telephone conference with Steve McCardell; Revise settlement agreements; Correspond with Receiver re same	2.80	1,036.00
12/04/23	CMM	Revise and serve initial disclosures to Darren Nelson counsel; Communicate with investors re potential claw back; Attorney conference with Michael Hoppe re the same; Review transfer of claims from investors	4.30	1,118.00
12/04/23	CBB	In Wells claw back action: Discuss service of motion for amended scheduling order internally; Discuss filing affidavit of service with staff; Review case docket	.30	88.50
12/04/23	CY	Prepare production for Darren Nelson; Email correspondence with Claire McGuire re same; Continue researching missing expert report for Richard Larsen	.90	139.50
12/05/23	JMC	Correspond with Michael Hoppe and Jeff Balls re Larsen discovery responses, expert report and related issues	.90	382.50
12/05/23	MTH	Correspond with Joe Covey re Flint Farms Trust; Correspond with Jeff Balls re expert reports in Larsen matter; Correspond with Joe Covey re Larsen matter	.30	121.50
12/05/23	MTH	Review schedule re hearings in Nelson BK matter	.10	40.50
12/05/23	MTH	Telephone conference with Joe Covey re Larsen matter; Meeting with Joe Covey and Jeff Balls re Larsen matter	.70	283.50
12/05/23	JAB	Review attorney fees application; Conference with Joseph Covey and Michael Hoppe	1.30	481.00
12/05/23	CBB	Speak with Bruce Roberts on phone call (.4); Review case filings and docket (.1); Draft and send update to Receiver and attorneys on case (.2)	.70	206.50
12/06/23	JMC	Review 2004 exam information re Darren Nelson deposition; correspond with Michael Hoppe, Claire McGuire and Mike Thompson re the same	1.00	425.00
12/06/23	MTH	Conference with Claire McGuire re Nelson bankruptcy matter	.10	40.50
12/06/23	MTH	Review and respond to correspondence re Nelson matter	.30	121.50
12/06/23	MTH	Review correspondence from Trustee in Nelson case and correspond with Joe Covey re 2004 exam	.20	81.00
12/06/23	MJB	(Hafen v. Howell) Conference with Jeff Balls (0.1); Correspond with Jon Hafen and Joe Covey (0.1); Prepare for mediation conference (0.2)	.40	156.00
12/06/23	JAB	Review initial disclosures; Correspond with Michael Hoppe; Correspond with Ray Strong	1.60	592.00

PARR BROWN GEE & LOVELESS

Invoice: 938383
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

January 15, 2024
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Date	Tkpr	Description	Hours	Amount
12/06/23	CMM	Draft attorney planning meeting; Review answer; Communicate with paralegals re discovery issues; Review updated expert report	4.20	1,092.00
12/07/23	JMC	Correspond with Michael Hoppe re Larsen expert report issues; Prepare for and attend deposition of Darren Nelson; Correspond with Mike Thompson re non-discharge lawsuits	6.60	2,805.00
12/07/23	MTH	Review correspondence re expert reports in Larsen matter; Correspond with legal team re updated report; Review and revise attorney planning report in Nelson matter	.70	283.50
12/07/23	MTH	Review updated Ray Strong report and exhibits and correspond with counsel in Larsen matter re same	.30	121.50
12/07/23	MJB	(Hafen v. Howell) Attend mediation conference (2.2)	2.20	858.00
12/07/23	JAB	Correspond with team re expert report; Correspond with Steve McCardell; Attend appellate mediation for Howells	3.40	1,258.00
12/07/23	CMM	Attorney conference with Michael Hoppe and Joseph Covey re bankruptcy deposition and attorney planning report; Research issues associated with the same	.90	234.00
12/07/23	JL	Prepare expert report of Ray Strong for distribution to opposing counsel; Discussion with Michael Hoppe re same	.20	41.00
12/08/23	JMC	Meeting with Michael Hoppe and Claire McGuire re Darren Nelson 2004 examination; Correspond with Mike Thompson re the same; Review Darren Nelson evidence	3.60	1,530.00
12/08/23	MTH	Correspond with Joe Covey re Darren Nelson 2004 examination	.10	40.50
12/08/23	MTH	Meeting with Joe Covey and Claire McGuire re Nelson case and strategy; Telephone conference with Chapter 7 trustee re Nelson case	1.60	648.00
12/08/23	MJB	Conference with Jeff Balls (0.1); Correspond with Michael Harris (0.1)	.20	78.00
12/08/23	JAB	Review correspondence from Matthew Barneck; Review correspondence re judgment lien	.30	111.00
12/08/23	WOP	Email correspondence re distributions to victims	.40	112.00
12/08/23	CMM	Meet with Michael Hoppe and Joseph Covey re bankruptcy 2004 exam; Review Answer from Nelson case; Draft attorney planning meeting report; Research issues associated with the same; Review Larsen report	8.50	2,210.00
12/08/23	CBB	Review voicemail left by Bruce Roberts (substituted defendant in Wells claw back action); Return phone call and discuss his record collection efforts; Schedule time to retrieve records	.40	118.00
12/09/23	JAB	Draft motion to approve settlement agreement; Correspond with Robert Wing	1.10	407.00
12/11/23	RMB	Revise LeRay Andreini default papers; Review Larry Milligan file note and documents	1.20	486.00
12/11/23	JAB	Correspond with Matthew Barneck; Finalize motion to approve Bary Jones settlement; Conference with Robert Wing; Telephone conference with Steve Waterman; Review expert report of Ray Strong	2.60	962.00

PARR BROWN GEE & LOVELESS

Invoice: 938383
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

January 15, 2024
 Client: 176430
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Date	Tkpr	Description	Hours	Amount
12/11/23	CMM	Review and revise Bary Jones settlement motion and order; Attorney conference with Jeffery Balls re the same	2.50	650.00
12/11/23	CBB	In Wells claw back action, call Bruce Roberts and discuss case and needed documentation; Coordinate document retrieval with runners	.60	177.00
12/12/23	JMC	Correspond with Michael Hoppe, Ray Strong and others re expert rebuttal report; Review and analyze report	1.40	595.00
12/12/23	MTH	Review and evaluate draft report from Ray Strong in Larsen matter; Correspond with legal team re draft report; Review and respond to correspondence from BRG re draft report	1.00	405.00
12/12/23	MTH	Review and respond to correspondence from BRG re expert report in Larsen matter	.10	40.50
12/12/23	MTH	Meeting with BRG re expert report in Larsen matter	.30	121.50
12/12/23	JAB	Review Ray Strong expert report; Review RRC files; Telephone conference with BRG and team	2.70	999.00
12/12/23	CMM	Review expert rebuttal report sent by Ray Strong; Participate in meeting with experts to discuss report and next steps; Review research for claw back action	3.60	936.00
12/12/23	CBB	Review and analyze documents disclosed by Bruce Roberts; Draft email to expert re documents; Draft and send email memo with summary and recommendations to Receiver and attorneys on case	1.70	501.50
12/13/23	JMC	Correspond with Jeff Balls re expert report and litigation strategy	.80	340.00
12/13/23	JAB	Review settlement correspondence; Correspond with Steven McCardell; Conference with Joseph Covey; Review quit claim deed	2.00	740.00
12/13/23	CBB	Discuss dismissal of action with Jeff Balls, Joe Covey, and Jon Hafen; Draft and revise motion for voluntary dismissal; Draft and revise proposed order granting motion for voluntary dismissal; Effectuate filing and service of motion and signed order	3.30	973.50
12/13/23	RGW	Emails re Woodfin settlement	.20	90.00
12/14/23	RMB	Review Andreini and Rico investor group analyses and files	.40	162.00
12/14/23	MTH	Review correspondence from Ray Strong re expert report in Larsen matter; Correspond with legal team re Strong report in Larsen matter	.20	81.00
12/14/23	JAB	Review Strong supplemental report	.70	259.00
12/14/23	CMM	Review final draft of Ray Strong Rebuttal report; Draft new section of summary judgement motion for Larsen case; Attorney conference with Jeffery Balls re the same; Review order approving settlement for Jones	6.60	1,716.00
12/14/23	CBB	Review court order dismissing action and closing case; Call Bruce Roberts to discuss dismissal and preferred document disposition; Forward order to litigation team and report on case dismissal	.40	118.00
12/15/23	JMC	Correspond with Ray Strong re expert report	.30	127.50
12/15/23	JAB	Review motion to dismiss for Howells; Correspond with Blake Faulkner	1.10	407.00
12/18/23	JMC	Correspond with Jeff Balls and Claire McGuire re Larsen expert discovery issues; Correspond with Jeff Balls re settlement proposal	.80	340.00

PARR BROWN GEE & LOVELESS

Invoice: 938383
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

January 15, 2024
 Client: 176430
 Matter: 2

Date	Tkpr	Description	Hours	Amount
12/18/23	MTH	Review correspondence and filings from BK trustee in Darren Nelson case; Correspond with Claire McGuire re planning meeting report in Nelson case	.20	81.00
12/18/23	MTH	Conference with Claire McGuire re Larsen and Flint	.20	81.00
12/18/23	JAB	Conference with Claire McGuire; Conference with Joseph Covey	.40	148.00
12/18/23	CMM	Attorney conference with Michael Hoppe re Nelson case; Serve attorney planning meeting draft to opposing counsel; Review response from Jory Trease and draft response to the same; Review transfer notice for investors	2.90	754.00
12/19/23	JAB	Conference with Robert Wing re settlement; Correspond with Steve McCardell	.90	333.00
12/20/23	JMC	Correspond with Claire McGuire re Nelson scheduling order; Correspond with Jory Trease re the same	.60	255.00
12/20/23	MTH	Review correspondence from Nelson's counsel and correspond with team re attorney planning meeting	.10	40.50
12/20/23	MTH	Conference with Claire McGuire re attorney planning meeting	.10	40.50
12/20/23	MTH	Review correspondence from opposing counsel in Nelson matter and conference with Claire McGuire re planning conference	.20	81.00
12/20/23	MTH	Review draft response to opposing counsel and correspond with Claire McGuire re same in Nelson matter	.10	40.50
12/20/23	JAB	Review Bary Jones information	2.50	925.00
12/20/23	CMM	Attorney conference with Michael Hoppe to discuss Nelson case and potential settlement offer from net winner investor; Communicate with opposing counsel in the Nelson matter	3.40	884.00
12/21/23	JMC	Correspond with Claire McGuire re Darren Larson discovery issues and attorney planning meeting report	1.00	425.00
12/21/23	MTH	Review correspondence re attorney planning meeting in Nelson matter	.10	40.50
12/21/23	JAB	Review Bary Jones information; Conference with Bary Jones	2.60	962.00
12/21/23	CMM	Communicate with opposing counsel in Nelson matter; Draft argument section of summary judgement motion; Review documents associated with Nelson matter; Research what constitutes a statement re assets	4.40	1,144.00
12/22/23	JMC	Review order extending deadline to object to Darren Nelson's bankruptcy discharge; Correspond with Mike Thompson and others re a meeting with the receiver	.40	170.00
12/22/23	CBB	In Muir claw back, review case deadlines and case filings	.20	59.00
12/26/23	JAB	Correspond with Robert Wing; Review documents	.70	259.00
12/26/23	RGW	Review email from counsel for Mr. Oberhansly; Emails with Jonathan Hafen and Jeff Balls re same; Prepare for mediation	.80	360.00
12/27/23	JAB	Correspond with Jonathan Hafen; Review documents for Oberhansley; Correspond with Blake Faulkner re quitclaim deed	1.80	666.00
12/27/23	CMM	Attorney conference with Jeffery Balls re return of consigned items; Draft settlement proposal	2.60	676.00
12/27/23	RGW	Emails with Jonathan Hafen re Woodfin settlement	.20	90.00

PARR BROWN GEE & LOVELESS

Invoice: 938383
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

January 15, 2024
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Date	Tkpr	Description	Hours	Amount
12/28/23	JAB	Conference with Claire McGuire; Review documents for Oberhansley	1.00	370.00
12/29/23	CBB	Review service affidavit in Wells claw back action; Discuss filing of affidavit with staff	.20	59.00

TOTAL PROFESSIONAL SERVICES **\$ 212,556.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	425.00	47.90	20,357.50
Rodger M Burge	405.00	46.20	18,711.00
Michael T Hoppe	405.00	18.40	7,452.00
Matthew J Ball	390.00	7.40	2,886.00
Jeffery A Balls	370.00	126.80	46,916.00
Chaunceton B Bird	295.00	55.90	16,490.50
Walter O Peterson	280.00	6.90	1,932.00
Rick D Rose	260.00	2.10	546.00
Claire M McGuire	260.00	204.10	53,066.00
Tammy M Frisby	250.00	3.60	900.00
Thomas M Melton	450.00	55.50	24,975.00
Robert G Wing	450.00	36.60	16,470.00
Jasmine Leonardi - Paralegal	205.00	.20	41.00
Crista Yancey - Paralegal	155.00	11.70	1,813.50
TOTALS		623.30	\$ 212,556.50

COSTS ADVANCED

Date	Description	Amount
10/05/23	PACER Electronic Court Records	23.90
10/18/23	PACER Electronic Court Records	3.00
10/19/23	PACER Electronic Court Records	3.60
10/31/23	PACER Electronic Court Records	4.80
10/31/23	October 2023 Westlaw charges	360.12
11/08/23	US District Court - certified documents	11.00
11/09/23	FedEx - Sacks Tierney/Susan D. Ensslin	34.32
11/13/23	Michelle Gonsalves - copy of hearing transcript	62.00
11/30/23	November 2023 Westlaw charges	182.72
12/13/23	PACER Electronic Court Records	7.20
12/14/23	SimpleCertified Mail	17.44

TOTAL COSTS ADVANCED **\$ 710.10**

TOTAL THIS INVOICE **\$ 213,266.60**

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

Rust Rare Coin Receivership

January 15, 2024

Invoice: 938383
Client: 176430
Matter: 2

REMITTANCE ADVICE

RE: Asset Analysis & Recovery

BALANCE DUE THIS INVOICE

\$ 213,266.60

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

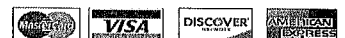
Routing #: 124001545
Account #: 912454114

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

Please reference your invoice # 938383

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

January 15, 2024

Invoice: 938384
Client: 176430
Matter: 3

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Disposition of Assets

Professional Services	\$ 1,046.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 1,046.00

PARR BROWN GEE & LOVELESS

Invoice: 938384
 Rust Rare Coin Receivership
 Disposition of Assets

January 15, 2024
 Client: 176430
 Matter: 3

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/09/23	JMC	Correspond with Jeff Balls re the sale of assets and the collection of funds as requested by the CFTC; Review financial information	2.20	935.00
10/09/23	JAB	Conference with Joseph Covey re enforcement and settlement matters; Review documents Denise Rust settlement and payments	.30	111.00

TOTAL PROFESSIONAL SERVICES \$ 1,046.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	425.00	2.20	935.00
Jeffery A Balls	370.00	.30	111.00
TOTALS		2.50	\$ 1,046.00

TOTAL THIS INVOICE \$ 1,046.00

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

Rust Rare Coin Receivership

January 15, 2024

Invoice: 938384
Client: 176430
Matter: 3

REMITTANCE ADVICE

RE: Disposition of Assets

BALANCE DUE THIS INVOICE

\$ 1,046.00

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

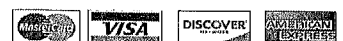
Routing #: 124001545
Account #: 912454114

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Rust Rare Coin Receivership

January 15, 2024

Invoice: 938385
Client: 176430
Matter: 5

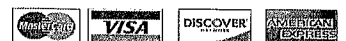
INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Claims Administration

Professional Services	\$ 36,747.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 36,747.00



PARR BROWN GEE & LOVELESS

Invoice: 938385
 Rust Rare Coin Receivership
 Claims Administration

January 15, 2024
 Client: 176430
 Matter: 5

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/02/23	JAB	Revise claims registry; Review correspondence from claimant; Correspond with Jonathan Hafen re same	1.70	629.00
10/03/23	JAB	Draft submission to court re objections to claims registry; Telephone conference with claimants; Conference with Jon Hafen re claims	3.90	1,443.00
10/03/23	CMM	Attorney conference with Jeffery Balls re issues associated with upcoming hearing	.60	156.00
10/04/23	JAB	Draft submission for claim objections; Review exhibits for production; Conference with Robert Wing; Telephone conference with Jeff Shaw	8.40	3,108.00
10/05/23	JAB	Revise claims registry; Telephone conference with claimants; Finalize filing for claims objections; Conference with Claire McGuire	4.10	1,517.00
10/06/23	JMC	Correspond with Matt Ball re injunction lien in Howell matter	.20	85.00
10/06/23	JAB	Review claims; Telephone conference with claimants; Correspond with claimants; Correspond with Jonathan Hafen re claims	2.20	814.00
10/09/23	JAB	Conference with Joseph Covey re claims	.50	185.00
10/09/23	CMM	Attorney conference with Jeffery Balls re maintained objections to claims process; Search for furlough documents and notice of the same	.80	208.00
10/10/23	CH	Attorney conference with Claire McGuire re determining if employee with wage claim received notice; Review prior file and emails re evidence of same	.50	192.50
10/10/23	JAB	Review claims registry; Conference with Claire McGuire re claims; Correspond with James Tracy	1.00	370.00
10/11/23	JAB	Prepare for hearing	.50	185.00
10/12/23	JMC	Correspond with Jeff Balls re claims and claims hearing	.40	170.00
10/12/23	JAB	Prepare for hearing on claim registry; Argue at hearing re claims registry; Conference with Joseph Covey; Review documents from Scott Lang; Draft response to Scott Lang	6.50	2,405.00
10/12/23	CMM	Review minute entry from hearing re final claims objections; Attorney conference re the same	.50	130.00
10/13/23	JAB	Draft response to claimant evidence; Research case law re consequential damages	2.00	740.00
10/16/23	JAB	Correspond with Scott Lang; Draft response to objection; Revise claims registry	3.60	1,332.00
10/17/23	JAB	Draft response to claims; Revise claims registry	2.20	814.00
10/20/23	JAB	Correspond to claimants	.40	148.00
10/23/23	JAB	Review and revise claims registry	3.70	1,369.00
10/24/23	JAB	Review order re claims registry; Finalize claims registry; Correspond with Jeff Shaw and Ray Strong re same; Email Scott Lang	.90	333.00
10/25/23	JMC	Correspond with Jeff Balls re claims payment issues	.40	170.00
10/25/23	JAB	Finalize claims registry	.30	111.00
11/02/23	JAB	Correspond with claimants; Update claims registry	.50	185.00

PARR BROWN GEE & LOVELESS

Invoice: 938385
 Rust Rare Coin Receivership
 Claims Administration

January 15, 2024
 Client: 176430
 Matter: 5

Date	Tkpr	Description	Hours	Amount
11/06/23	JAB	Correspond with Paul Scarlato re claimant	.20	74.00
11/07/23	JAB	Correspond with claimants; Revise claims registry; Telephone conference with Jeff Shaw; Telephone conference with Paul Scarlato and Paul Mulholland	2.00	740.00
11/13/23	JMC	Correspond with Jeff Balls re claims	.10	42.50
11/14/23	JAB	Correspond with claimants	.40	148.00
11/16/23	JAB	Call claimants re claims	.20	74.00
11/17/23	JMC	Correspond with Jeff Balls re claims transfer; Review transfer agreement; Correspond with Andrew Valentini re the same	.30	127.50
11/17/23	JAB	Correspond re assignment of claims; Review and revise claims registry	2.70	999.00
11/20/23	JAB	Revise claims registry for assignment of claims; Attention to correspondence re same; Revise Zions claims registry	2.60	962.00
11/21/23	JAB	Review claims; Telephone conference with claimants; Conference with Joseph Covey re claims; Email Jeff Shaw re claims registry	2.30	851.00
11/27/23	JAB	Telephone conference with claimants	.30	111.00
11/28/23	JMC	Correspond with Jeff Balls re claims issues and related matters	.20	85.00
11/28/23	JAB	Correspond with claimants; Review website responses	.90	333.00
11/29/23	JAB	Correspond with claimants	.30	111.00
11/30/23	JMC	Correspond with Jeff Balls re claims issues	.10	42.50
11/30/23	JAB	Correspond re assignment of claims; Correspond with Paul Scarlato; Conference with Robert Wing; Correspond with claimants	2.40	888.00
12/01/23	JAB	Review correspondence from claimants; Correspond with VonWin re assignment; Revise claims registry	.30	111.00
12/04/23	JMC	Correspond with Jeff Balls re Bary Jones settlement, Zions claims payments and related issues	.40	170.00
12/04/23	JAB	Finalize affidavit of attorney fees	.30	111.00
12/05/23	JAB	Finalize motion for fees and costs; Correspond with claimants re transfer of claims; Correspond with Stretto re account and distribution; Telephone conference with Jeff Shaw	2.70	999.00
12/06/23	JAB	Correspond with Jeff Shaw	.50	185.00
12/07/23	JAB	Correspond with Jeffrey Shaw	.30	111.00
12/08/23	JAB	Telephone conference with claimants; Telephone conference with Jeff Shaw; Correspond with Jonathan Hafen re distribution; Review claims registry	1.70	629.00
12/11/23	JAB	Correspond with Jeff Shaw; Review employee claims; Correspond with Paul Mulholland re Zions distribution; Telephone conference with claimants	1.90	703.00
12/12/23	JAB	Telephone conference with claimants; Revise claims registry; Correspond with Paul Mulholland re Zions amount; Email VonWin re assignment of claims	1.10	407.00
12/13/23	JMC	Correspond with Jeff Balls and Blake Faulkner re sale of hymns to the Church of Jesus Christ	.60	255.00

PARR BROWN GEE & LOVELESS

Invoice: 938385
 Rust Rare Coin Receivership
 Claims Administration

January 15, 2024
 Client: 176430
 Matter: 5

Date	Tkpr	Description	Hours	Amount
12/13/23	JAB	Telephone conference with Jeff Shaw; Review accounts; Correspond with Jonathan Hafen	1.10	407.00
12/14/23	JMC	Correspond with Jeff Balls re claims issues	.20	85.00
12/14/23	JAB	Review and revise claims registry; Correspond with claimants	2.50	925.00
12/15/23	JAB	Telephone conference with claimants; Review claims form; Telephone conference with Jeff Shaw	2.00	740.00
12/18/23	JMC	Correspond with Jeff Balls re payment of claims	.20	85.00
12/18/23	JAB	Review rising tide analysis; Email claimants re assignment of claims; Telephone conference with claimants; Telephone conference with Jeff Shaw	2.80	1,036.00
12/19/23	JAB	Email Stretto re taxes; Conference with Jonathan Hafen; Correspond with Jeff Shaw	1.40	518.00
12/20/23	JAB	Review rising tide methodology; Telephone conference with Jeff Shaw; Review addresses; Telephone conference with claimants; Email VonWin re claims	2.30	851.00
12/21/23	JAB	Review payroll check stubs; Finalize claims registry	3.20	1,184.00
12/22/23	JAB	Draft letter to claimants; Conference with Jeff Shaw; Review claims registry	1.60	592.00
12/26/23	JAB	Review claims registry; Correspond with Jeff Shaw; Review and revise final claims registry; Telephone conference with claimants	3.80	1,406.00
12/27/23	JAB	Review claims registry; Telephone conference with Jeff Shaw; Correspond with Stretto re distribution; Coordinate payment to secured claimants; Draft letter to secured claimants; Revise letter to unsecured claimants	5.00	1,850.00
12/28/23	JAB	Review comments on website; Correspond with claimants; Telephone conference with Stretto	.90	333.00
12/29/23	JAB	Correspond with claimants; Telephone conference with claimants; Correspond with Stretto re distribution; Update addresses on claims registry	1.80	666.00

TOTAL PROFESSIONAL SERVICES

\$ 36,747.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	425.00	3.10	1,317.50
Cheylynn Hayman	385.00	.50	192.50
Jeffery A Balls	370.00	93.90	34,743.00
Claire M McGuire	260.00	1.90	494.00
TOTALS		99.40	\$ 36,747.00

PARR BROWN GEE & LOVELESS

Invoice: 938385
Rust Rare Coin Receivership
Claims Administration

January 15, 2024
Client: 176430
Matter: 5

TOTAL THIS INVOICE

\$ 36,747.00

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

Rust Rare Coin Receivership

January 15, 2024

Invoice: 938385
Client: 176430
Matter: 5

REMITTANCE ADVICE

RE: Claims Administration

BALANCE DUE THIS INVOICE

\$ 36,747.00

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 # 938385

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

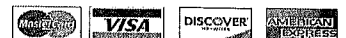


EXHIBIT C

EXHIBIT C

TWENTY-FIRST INTERIM FEE APPLICATION

Time Records of BRG

EXHIBIT C



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

February 29, 2024
Client-Matter: 16222-25457
Invoice #: 170541
Tax ID # 27-1451273

Via Email: jhafen@parrbrown.com

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

Services Rendered From October 1, 2023 Through December 31, 2023

Professional Services	\$ 179,693.00	USD
Voluntary Reduction	(994.00)	
CURRENT CHARGES	\$ 178,699.00	USD

PAYMENT IS DUE BY March 30, 2024

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: 170541

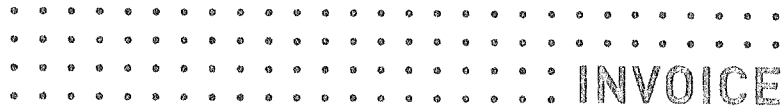
Please remit check payment to:

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

Please send remittance advice details 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 # 170541
 Client-Matter: 16222-025457

Services Rendered From October 1, 2023 Through December 31, 2023

PROFESSIONAL SERVICES

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Managing Director			
Vernon Calder	440.00	0.50	220.00
Paul Shields	415.00	1.70	705.50
Ray Strong	400.00	196.60	78,640.00
Director			
Matthew Babcock	370.00	0.90	333.00
Associate Director			
Leif Larsen	355.00	5.70	2,023.50
Jeffrey Shaw	355.00	205.90	73,094.50
Jeffrey Shaw	0.00	2.80	N/C
Senior Managing Consultant			
Jared Funk	340.00	2.00	680.00
Associate			
Spencer Rawlings	225.00	88.30	19,867.50
Case Assistant			
Dallin Godfrey	110.00	28.50	3,135.00
Total Professional Services		532.90	178,699.00

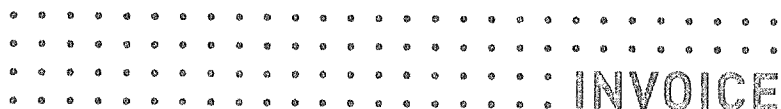


To: Jonathan O. Hafen
c/o: Parr Brown Gee & Loveless
RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

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Invoice # 170541
Client-Matter: 16222-025457

SUMMARY BY TASK CODE

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
300	Claims Process / Distribution	78.40	27,502.00
350	Net Winner / Claims Analysis	17.10	6,070.50
500	Recovery Litigation	423.80	141,497.00
600	Tax Compliance & Analysis	8.10	2,671.00
940	Hearing Preparation / Attendance	2.70	958.50
950	Fee Application Preparation & Hearing	2.80	0.00
Total Professional Services		532.90	178,699.00



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

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Services Rendered From October 1, 2023 Through December 31, 2023

DETAIL OF PROFESSIONAL SERVICES

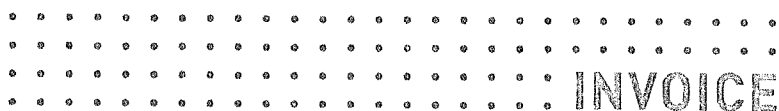
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 300 - Claims Process / Distribution					
11/02/23	Jeffrey Shaw	Analyzed claims register data in connection with distribution.	1.50	355.00	532.50
11/06/23	Jeffrey Shaw	Analyzed claims register and support in connection with distribution.	5.80	355.00	2,059.00
11/07/23	Jeffrey Shaw	Analyzed claims register in connection with distribution.	3.10	355.00	1,100.50
11/08/23	Jeffrey Shaw	Analyzed claims and prepared rising tide distribution model.	5.80	355.00	2,059.00
11/10/23	Jeffrey Shaw	Analyzed claims and prepared rising tide distribution model.	3.60	355.00	1,278.00
11/13/23	Jeffrey Shaw	Discussion with counsel regarding plan of distribution.	0.30	355.00	106.50
11/13/23	Jeffrey Shaw	Analyzed claims and prepared rising tide distribution model.	4.50	355.00	1,597.50
11/17/23	Jeffrey Shaw	Call with counsel regarding claims distribution.	0.20	355.00	71.00
11/22/23	Jeffrey Shaw	Reviewed and updated distribution model.	3.40	355.00	1,207.00
11/27/23	Jeffrey Shaw	Reviewed claims and distribution model.	0.60	355.00	213.00
11/30/23	Jeffrey Shaw	Analyzed claim data and updated distribution model.	2.30	355.00	816.50
12/01/23	Jeffrey Shaw	Analyzed claim data and updated distribution model.	2.30	355.00	816.50
12/05/23	Jeffrey Shaw	Reviewed and discussed tax related issues regarding Zions distribution.	0.50	355.00	177.50
12/05/23	Jeffrey Shaw	Discussion with counsel regarding claim distribution.	0.30	355.00	106.50
12/06/23	Jeffrey Shaw	Reviewed and updated distribution model.	4.80	355.00	1,704.00
12/06/23	Jeffrey Shaw	Reviewed and updated claims registry.	0.70	355.00	248.50
12/08/23	Jeffrey Shaw	Reviewed and updated claims registry.	0.50	355.00	177.50



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

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 Invoice # 170541
 Client-Matter: 16222-025457

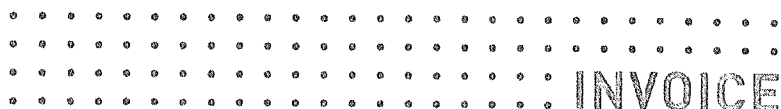
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/08/23	Jeffrey Shaw	Reviewed and updated distribution model.	1.30	355.00	461.50
12/08/23	Jeffrey Shaw	Call with counsel to discuss claims distribution.	0.50	355.00	177.50
12/11/23	Jeffrey Shaw	Follow-up with tax professionals and counsel regarding wage claim issues.	0.50	355.00	177.50
12/14/23	Jeffrey Shaw	Call with counsel regarding plan of distribution.	0.40	355.00	142.00
12/14/23	Jeffrey Shaw	Discussion and review of distribution model.	0.60	355.00	213.00
12/14/23	Ray Strong	Attended call regarding distribution model.	0.60	400.00	240.00
12/15/23	Jared Funk	Analyzed distribution model.	2.00	340.00	680.00
12/15/23	Jeffrey Shaw	Discussion and review of distribution model.	1.70	355.00	603.50
12/15/23	Jeffrey Shaw	Reviewed and updated distribution model.	2.40	355.00	852.00
12/15/23	Paul Shields	Reviewed initial distribution analysis.	1.70	415.00	705.50
12/18/23	Spencer Rawlings	Analyzed wage claims in connection with distribution.	3.10	225.00	697.50
12/18/23	Jeffrey Shaw	Reviewed wage claim issues.	0.70	355.00	248.50
12/18/23	Jeffrey Shaw	Discussion with counsel regarding distribution model.	0.50	355.00	177.50
12/18/23	Jeffrey Shaw	Reviewed and updated distribution model.	1.80	355.00	639.00
12/19/23	Jeffrey Shaw	Evaluated wage claim issues in connection with distribution.	1.40	355.00	497.00
12/19/23	Jeffrey Shaw	Reviewed and updated wage claim schedule.	1.10	355.00	390.50
12/20/23	Spencer Rawlings	Updated wage claim distribution schedule.	0.20	225.00	45.00
12/20/23	Jeffrey Shaw	Evaluated distribution model.	1.30	355.00	461.50
12/20/23	Jeffrey Shaw	Prepared distribution schedules.	1.20	355.00	426.00
12/21/23	Jeffrey Shaw	Prepared distribution lists.	1.30	355.00	461.50
12/21/23	Jeffrey Shaw	Call with counsel regarding distribution.	0.30	355.00	106.50
12/21/23	Jeffrey Shaw	Review and call regarding wage claims.	0.80	355.00	284.00



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 # 170541
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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/22/23	Jeffrey Shaw	Reviewed claim data and prepared distribution lists.	4.80	355.00	1,704.00
12/22/23	Jeffrey Shaw	Reviewed proposed distribution letter and discussion regarding the same.	0.70	355.00	248.50
12/22/23	Jeffrey Shaw	Call with counsel regarding distribution.	0.20	355.00	71.00
12/22/23	Jeffrey Shaw	Prepared distribution schedules and submitted to counsel.	0.30	355.00	106.50
12/26/23	Jeffrey Shaw	Reviewed and updated distribution lists.	1.50	355.00	532.50
12/26/23	Jeffrey Shaw	Reviewed distribution letter and provided comments to counsel.	0.50	355.00	177.50
12/27/23	Jeffrey Shaw	Discussions with counsel regarding distribution.	0.50	355.00	177.50
12/27/23	Jeffrey Shaw	Reviewed and discussed tax issues in connection with distribution.	0.50	355.00	177.50
12/27/23	Jeffrey Shaw	Reviewed and updated distribution lists.	1.30	355.00	461.50
12/27/23	Jeffrey Shaw	Reviewed and resolved issues in connection with distribution.	0.90	355.00	319.50
12/27/23	Jeffrey Shaw	Reviewed and revised distribution letter.	0.50	355.00	177.50
12/27/23	Jeffrey Shaw	Finalized and submitted distribution lists.	0.80	355.00	284.00
12/29/23	Jeffrey Shaw	Reviewed and updated claimant addresses.	0.30	355.00	106.50
Total for Task Code 300			78.40		27,502.00
Task Code: 350 - Net Winner / Claims Analysis					
10/03/23	Jeffrey Shaw	Call with counsel regarding claims issues.	0.30	355.00	106.50
10/03/23	Jeffrey Shaw	Analyzed claims and prepared support requested by counsel.	2.10	355.00	745.50
10/04/23	Jeffrey Shaw	Analyzed claims and prepared support requested by counsel.	3.60	355.00	1,278.00
10/04/23	Jeffrey Shaw	Discussion and emails with counsel regarding claims issues.	0.40	355.00	142.00
10/04/23	Jeffrey Shaw	Reviewed claim registry filing and email to counsel.	0.70	355.00	248.50



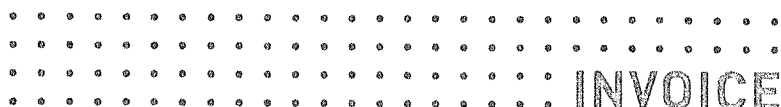
To: Jonathan O. Hafen
 c/o: Parr Brown Gee & Loveless
 RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

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 Invoice # 170541
 Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/12/23	Jeffrey Shaw	Discussion with counsel regarding claims issues.	0.20	355.00	71.00
11/01/23	Jeffrey Shaw	Attended meeting with Receiver and counsel regarding Lugli claim.	1.60	355.00	568.00
11/01/23	Jeffrey Shaw	Reviewed Lugli claim and support.	1.00	355.00	355.00
11/21/23	Jeffrey Shaw	Analyzed Lugli claim issues.	0.80	355.00	284.00
11/22/23	Jeffrey Shaw	Reviewed Lugli claim response to claim objection.	1.10	355.00	390.50
11/30/23	Jeffrey Shaw	Analyzed Bary Jones activity and proposed settlement.	4.10	355.00	1,455.50
11/30/23	Jeffrey Shaw	Call with counsel to discuss Bary Jones settlement.	0.90	355.00	319.50
12/01/23	Jeffrey Shaw	Call with counsel regarding B Jones settlement.	0.30	355.00	106.50
Total for Task Code 350			17.10		6,070.50

Task Code: 500 - Recovery Litigation

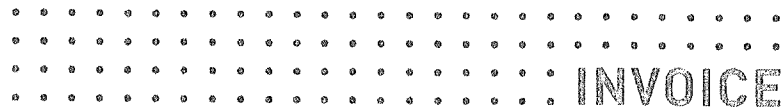
10/03/23	Spencer Rawlings	Analyzed investor statement activity for recovery litigation.	1.60	225.00	360.00
10/03/23	Spencer Rawlings	Continued analyzing investor statement activity for recovery litigation.	1.60	225.00	360.00
10/03/23	Jeffrey Shaw	Analyzed investor activity for recovery litigation.	1.80	355.00	639.00
10/03/23	Ray Strong	Analyzed investment statement activity for recovery litigation.	1.40	400.00	560.00
10/04/23	Spencer Rawlings	Analyzed investor statement activity for recovery litigation.	4.70	225.00	1,057.50
10/04/23	Spencer Rawlings	Continued analyzing investor statement activity for recovery litigation.	2.80	225.00	630.00
10/04/23	Ray Strong	Analyzed POS system data for historical metals transactions.	2.10	400.00	840.00
10/04/23	Ray Strong	Analyzed investor statements for analysis of alleged trading activity.	1.40	400.00	560.00
10/04/23	Ray Strong	Analyzed investor commission payments included on G.Rust statements.	1.10	400.00	440.00



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 # 170541
 Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/05/23	Spencer Rawlings	Analyzed investor statement activity for recovery litigation.	1.80	225.00	405.00
10/06/23	Spencer Rawlings	Analyzed investor statement activity for recovery litigation.	1.60	225.00	360.00
10/09/23	Spencer Rawlings	Analyzed investor statement activity for recovery litigation.	2.00	225.00	450.00
10/09/23	Jeffrey Shaw	Reviewed and prepared analysis for Larsen litigation.	5.00	355.00	1,775.00
10/09/23	Jeffrey Shaw	Discussion regarding Larsen litigation.	0.30	355.00	106.50
10/09/23	Ray Strong	Attended call regarding Larsen analyses.	0.30	400.00	120.00
10/09/23	Ray Strong	Analyzed Larsen statement activity for supplemental analysis.	0.40	400.00	160.00
10/10/23	Jeffrey Shaw	Analyzed Larsen investment payment activity.	5.30	355.00	1,881.50
10/10/23	Jeffrey Shaw	Discussion regarding Larsen litigation.	0.80	355.00	284.00
10/10/23	Jeffrey Shaw	Reviewed documents in connection with Larsen litigation.	0.50	355.00	177.50
10/10/23	Jeffrey Shaw	Reviewed G Rust deposition regarding Larsen litigation.	1.10	355.00	390.50
10/10/23	Ray Strong	Attended call regarding Larsen litigation issues.	0.80	400.00	320.00
10/10/23	Ray Strong	Analyzed Gaylen deposition transcripts.	2.10	400.00	840.00
10/10/23	Ray Strong	Analyzed POS system data for historical metals transactions.	1.90	400.00	760.00
10/11/23	Jeffrey Shaw	Reviewed Larsen investment activity and support.	3.20	355.00	1,136.00
10/11/23	Jeffrey Shaw	Analyzed Larsen investment activity.	3.80	355.00	1,349.00
10/11/23	Ray Strong	Analyzed Gaylen Rust deposition.	2.10	400.00	840.00
10/11/23	Ray Strong	Discussed Gaylen Rust deposition with counsel.	0.50	400.00	200.00
10/12/23	Jeffrey Shaw	Reviewed G Rust deposition in connection with Larsen litigation.	2.90	355.00	1,029.50
10/12/23	Ray Strong	Analyzed POS system data for historical metals transactions.	3.70	400.00	1,480.00



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 # 170541
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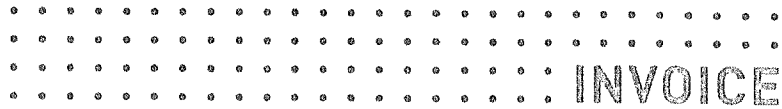
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/13/23	Jeffrey Shaw	Reviewed G Rust deposition and exhibits in connection with Larsen litigation.	2.80	355.00	994.00
10/14/23	Ray Strong	Analyzed accounting system data for historical metals transactions.	4.20	400.00	1,680.00
10/15/23	Ray Strong	Analyzed Larsen document production in connection with litigation.	4.40	400.00	1,760.00
10/16/23	Dallin Godfrey	Analyzed RRC financial statements for recovery litigation.	5.00	110.00	550.00
10/16/23	Jeffrey Shaw	Call regarding Larsen litigation.	0.90	355.00	319.50
10/16/23	Ray Strong	Analyzed investor activity included on G.Rust historical statements.	3.20	400.00	1,280.00
10/17/23	Dallin Godfrey	Analyzed RRC financial statements for recovery litigation.	0.70	110.00	77.00
10/17/23	Jeffrey Shaw	Discussion regarding Larsen activity.	0.20	355.00	71.00
10/17/23	Jeffrey Shaw	Analyzed RRC bank activity in connection with Larsen litigation.	2.30	355.00	816.50
10/17/23	Ray Strong	Analyzed accounting system data for historical metals transactions.	1.70	400.00	680.00
10/17/23	Ray Strong	Analyzed J.Rust deposition transcript.	2.40	400.00	960.00
10/17/23	Ray Strong	Analyzed Larsen activity included on G.Rust historical statements.	2.10	400.00	840.00
10/18/23	Dallin Godfrey	Analyzed investor statement activity for recovery litigation.	5.20	110.00	572.00
10/18/23	Spencer Rawlings	Analyzed investor statement activity for recovery litigation.	5.10	225.00	1,147.50
10/18/23	Jeffrey Shaw	Attended call with counsel regarding Larsen litigation.	1.70	355.00	603.50
10/18/23	Jeffrey Shaw	Reviewed Larsen activity and support and prepared declaration narrative.	1.80	355.00	639.00
10/18/23	Ray Strong	Attended call with counsel regarding Rick Larsen litigation.	1.70	400.00	680.00
10/18/23	Ray Strong	Analyzed Rick Larsen deposition transcript for Larsen litigation.	2.10	400.00	840.00
10/19/23	Dallin Godfrey	Analyzed investor statement activity for recovery litigation.	8.00	110.00	880.00
10/19/23	Spencer Rawlings	Analyzed Larsen investor statement activity for Winter Haven Lot.	0.30	225.00	67.50



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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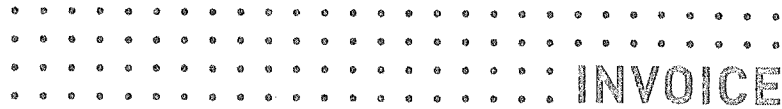
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/19/23	Spencer Rawlings	Analyzed Larsen investor statement activity for 90% Silver Rollover.	4.20	225.00	945.00
10/19/23	Spencer Rawlings	Analyzed Larsen investor statement activity for 90% Personal.	3.30	225.00	742.50
10/19/23	Jeffrey Shaw	Reviewed Larsen activity and support and prepared declaration narrative.	3.40	355.00	1,207.00
10/19/23	Ray Strong	Analyzed Larsen activity included on G.Rust historical statements.	2.70	400.00	1,080.00
10/20/23	Dallin Godfrey	Analyzed investor statement activity for recovery litigation.	7.10	110.00	781.00
10/20/23	Spencer Rawlings	Analyzed Larsen investor statement activity for Trust.	4.60	225.00	1,035.00
10/20/23	Spencer Rawlings	Analyzed Larsen investor statement activity for 90% Personal.	1.50	225.00	337.50
10/23/23	Dallin Godfrey	Analyzed investor statement activity for recovery litigation.	1.70	110.00	187.00
10/23/23	Jeffrey Shaw	Analyzed Larsen activity and support and prepared declaration narrative and schedules.	5.10	355.00	1,810.50
10/24/23	Dallin Godfrey	Attended call regarding investor statement activity analysis.	0.80	110.00	88.00
10/24/23	Spencer Rawlings	Analyzed historical metal pricings for recovery litigation.	2.50	225.00	562.50
10/24/23	Spencer Rawlings	Attended call regarding investor statement activity.	0.80	225.00	180.00
10/24/23	Jeffrey Shaw	Analyzed Larsen activity and support and prepared declaration narrative and schedules.	6.40	355.00	2,272.00
10/24/23	Ray Strong	Attended call with BRG regarding investor statement activity.	0.80	400.00	320.00
10/25/23	Jeffrey Shaw	Discussion with counsel regarding litigation issues.	0.60	355.00	213.00
10/25/23	Jeffrey Shaw	Analyzed Larsen activity and support and prepared declaration narrative and schedules.	6.70	355.00	2,378.50
10/26/23	Spencer Rawlings	Analyzed investor statement activity for recovery litigation.	0.90	225.00	202.50



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 # 170541
 Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
10/26/23	Jeffrey Shaw	Analyzed Larsen activity and support and prepared declaration narrative and schedules.	4.10	355.00	1,455.50
10/26/23	Jeffrey Shaw	Discussion with counsel regarding litigation issues.	0.20	355.00	71.00
10/27/23	Spencer Rawlings	Analyzed investor statement activity for recovery litigation.	0.60	225.00	135.00
10/27/23	Jeffrey Shaw	Analyzed Larsen activity and support and prepared declaration narrative and schedules.	5.50	355.00	1,952.50
10/30/23	Jeffrey Shaw	Prepared Larsen declaration exhibits.	1.80	355.00	639.00
10/30/23	Jeffrey Shaw	Reviewed Larsen documents.	1.20	355.00	426.00
10/30/23	Jeffrey Shaw	Call regarding Larsen declaration.	0.50	355.00	177.50
10/30/23	Jeffrey Shaw	Reviewed and revised Larsen declaration narrative and schedules.	2.90	355.00	1,029.50
10/30/23	Ray Strong	Reviewed BRG declaration regarding Larsen activity.	2.10	400.00	840.00
10/30/23	Ray Strong	Discussion regarding declaration to be filed in Larsen matter.	0.50	400.00	200.00
10/31/23	Jeffrey Shaw	Analyzed Larsen documents.	0.80	355.00	284.00
10/31/23	Jeffrey Shaw	Reviewed and revised Larsen declaration narrative and schedules.	2.90	355.00	1,029.50
10/31/23	Jeffrey Shaw	Finalized declaration narrative and schedules.	0.80	355.00	284.00
10/31/23	Ray Strong	Reviewed final BRG declaration in Larsen matter.	0.20	400.00	80.00
11/01/23	Jeffrey Shaw	Analyzed opposing expert supplemental report.	1.90	355.00	674.50
11/01/23	Jeffrey Shaw	Evaluated Larsen litigation issues.	2.30	355.00	816.50
11/02/23	Jeffrey Shaw	Reviewed Larsen litigation issues and status.	0.50	355.00	177.50
11/02/23	Jeffrey Shaw	Met with counsel regarding Larsen litigation.	1.90	355.00	674.50
11/02/23	Ray Strong	Attended meeting with Receiver counsel regarding Larsen litigation.	1.90	400.00	760.00
11/02/23	Ray Strong	Analyzed Larsen RRC statement activity.	2.10	400.00	840.00
11/02/23	Ray Strong	Discussed Larsen litigation issues.	0.50	400.00	200.00



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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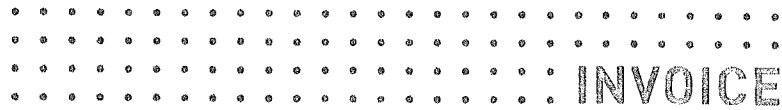
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/02/23	Ray Strong	Analyzed case data for Larsen rebuttal report.	2.20	400.00	880.00
11/03/23	Spencer Rawlings	Discussed Larsen litigation issues.	0.30	225.00	67.50
11/03/23	Spencer Rawlings	Analyzed Larsen statements for expert report.	3.00	225.00	675.00
11/03/23	Spencer Rawlings	Continued analyzing Larsen statements for expert report.	3.10	225.00	697.50
11/03/23	Ray Strong	Analyzed case data for Larsen rebuttal report issues.	3.20	400.00	1,280.00
11/03/23	Ray Strong	Analyzed Strong expert report for Larsen rebuttal report.	2.30	400.00	920.00
11/03/23	Ray Strong	Analyzed Hashimoto reports for Larsen rebuttal report.	0.80	400.00	320.00
11/03/23	Ray Strong	Analyzed J.Shaw declarations for Larsen rebuttal report.	0.90	400.00	360.00
11/06/23	Spencer Rawlings	Analyzed Larsen statements for expert report.	4.40	225.00	990.00
11/06/23	Ray Strong	Analyzed Larsen rebuttal report issues.	3.10	400.00	1,240.00
11/07/23	Spencer Rawlings	Analyzed Larsen statements for expert report.	3.40	225.00	765.00
11/07/23	Ray Strong	Attended call regarding Larsen rebuttal report issues.	0.20	400.00	80.00
11/08/23	Spencer Rawlings	Analyzed Larsen statements for expert report.	0.30	225.00	67.50
11/08/23	Jeffrey Shaw	Follow-up regarding litigation issues.	0.30	355.00	106.50
11/13/23	Jeffrey Shaw	Discussion with counsel regarding default judgment.	0.10	355.00	35.50
11/20/23	Ray Strong	Analyzed Josh Rust deposition transcript for Larsen rebuttal report.	3.10	400.00	1,240.00
11/20/23	Ray Strong	Analyzed Gaylen Rust deposition transcript for Larsen rebuttal report.	2.10	400.00	840.00
11/21/23	Ray Strong	Analyzed Gaylen Rust deposition transcript for Larsen rebuttal report.	2.30	400.00	920.00
11/22/23	Ray Strong	Analyzed Larsen RRC statement activity for rebuttal report.	2.20	400.00	880.00
11/23/23	Ray Strong	Analyzed Larsen RRC statement activity for rebuttal report.	2.10	400.00	840.00



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 # 170541
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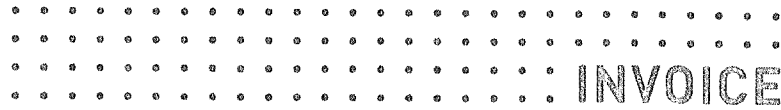
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
11/23/23	Ray Strong	Continued analyzing Larsen statement activity for rebuttal report.	2.70	400.00	1,080.00
11/27/23	Jeffrey Shaw	Analyzed Andreini group activity and prepared declaration in connection with default judgment (Larry Milligan & Terry Jones).	5.50	355.00	1,952.50
11/27/23	Jeffrey Shaw	Call with counsel regarding clawback litigations.	0.50	355.00	177.50
11/27/23	Ray Strong	Analyzed Larsen RRC statement activity for rebuttal report.	3.40	400.00	1,360.00
11/28/23	Spencer Rawlings	Continued analyzing Larsen statement activity for expert report.	4.00	225.00	900.00
11/28/23	Spencer Rawlings	Analyzed Larsen statements for expert report.	3.70	225.00	832.50
11/28/23	Jeffrey Shaw	Call with counsel regarding litigation issues.	0.40	355.00	142.00
11/28/23	Jeffrey Shaw	Analyzed L Milligan activity in connection with litigation.	0.50	355.00	177.50
11/29/23	Spencer Rawlings	Analyzed Larsen statement activity for expert report.	1.80	225.00	405.00
11/29/23	Spencer Rawlings	Continued analyzing Larsen investor statements for expert report.	3.30	225.00	742.50
12/01/23	Jeffrey Shaw	Reviewed status and issues regarding Larsen litigation.	0.60	355.00	213.00
12/01/23	Jeffrey Shaw	Call with counsel regarding Larsen litigation.	0.50	355.00	177.50
12/01/23	Jeffrey Shaw	Analyzed Larsen payment activity.	0.40	355.00	142.00
12/01/23	Ray Strong	Analyzed case documents for preparation of Larsen rebuttal report.	2.10	400.00	840.00
12/01/23	Ray Strong	Attended call with counsel regarding Larsen rebuttal report.	0.60	400.00	240.00
12/01/23	Ray Strong	Prepared rebuttal report for Larsen litigation.	1.90	400.00	760.00
12/01/23	Ray Strong	Analyzed transaction data for Larsen rebuttal report.	2.70	400.00	1,080.00
12/01/23	Ray Strong	Prepared Exhibits for Larsen rebuttal report.	2.30	400.00	920.00



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 # 170541
 Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/02/23	Ray Strong	Analyzed case documents for preparation of Larsen rebuttal report.	3.10	400.00	1,240.00
12/02/23	Ray Strong	Analyzed transaction data for Larsen rebuttal report.	3.10	400.00	1,240.00
12/02/23	Ray Strong	Prepared rebuttal report for Larsen litigation.	2.40	400.00	960.00
12/04/23	Jeffrey Shaw	Evaluated Larsen activity.	0.20	355.00	71.00
12/04/23	Jeffrey Shaw	Analyzed bank account activity and prepared schedules in connection with Larsen litigation.	2.50	355.00	887.50
12/04/23	Jeffrey Shaw	Call with counsel regarding Larsen litigation.	1.20	355.00	426.00
12/04/23	Ray Strong	Attended call with Receiver counsel and BRG for Larsen report.	1.20	400.00	480.00
12/04/23	Ray Strong	Analyzed transaction data for Larsen rebuttal report.	2.70	400.00	1,080.00
12/04/23	Ray Strong	Prepared exhibits for Larsen rebuttal report.	3.10	400.00	1,240.00
12/04/23	Ray Strong	Prepared rebuttal report for Larsen litigation.	0.60	400.00	240.00
12/05/23	Jeffrey Shaw	Analyzed bank account activity in connection with Larsen litigation.	1.00	355.00	355.00
12/05/23	Jeffrey Shaw	Discussion regarding Larsen litigation.	0.50	355.00	177.50
12/05/23	Ray Strong	Analyzed case documents for preparation of Larsen rebuttal report.	2.40	400.00	960.00
12/05/23	Ray Strong	Analyzed transaction data for Larsen rebuttal report.	1.40	400.00	560.00
12/05/23	Ray Strong	Prepared rebuttal report for Larsen litigation.	5.40	400.00	2,160.00
12/06/23	Spencer Rawlings	Analyzed investor statement activity for Larsen litigation.	2.70	225.00	607.50
12/06/23	Jeffrey Shaw	Call regarding investor settlement and litigation issues.	0.20	355.00	71.00
12/06/23	Ray Strong	Prepared exhibits for Larsen rebuttal report.	2.90	400.00	1,160.00
12/06/23	Ray Strong	Analyzed transaction data for Larsen rebuttal report.	1.90	400.00	760.00



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 # 170541
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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/06/23	Ray Strong	Prepared rebuttal report for Larsen litigation.	3.70	400.00	1,480.00
12/07/23	Ray Strong	Analyzed case documents for preparation of Larsen rebuttal report.	2.70	400.00	1,080.00
12/07/23	Ray Strong	Analyzed transaction data for Larsen rebuttal report.	2.10	400.00	840.00
12/07/23	Ray Strong	Prepared rebuttal report for Larsen litigation.	4.40	400.00	1,760.00
12/08/23	Jeffrey Shaw	Call regarding Larsen litigation.	0.60	355.00	213.00
12/08/23	Jeffrey Shaw	Reviewed Larsen rebuttal report exhibits.	1.50	355.00	532.50
12/08/23	Ray Strong	Prepared exhibits for Larsen rebuttal report.	2.50	400.00	1,000.00
12/08/23	Ray Strong	Analyzed transaction data for Larsen rebuttal report.	1.30	400.00	520.00
12/08/23	Ray Strong	Prepared rebuttal report for Larsen litigation.	6.70	400.00	2,680.00
12/09/23	Ray Strong	Prepared exhibits for Larsen rebuttal report.	4.10	400.00	1,640.00
12/09/23	Ray Strong	Prepared rebuttal report for Larsen litigation.	6.40	400.00	2,560.00
12/10/23	Ray Strong	Prepared exhibits for Larsen rebuttal report.	3.40	400.00	1,360.00
12/10/23	Ray Strong	Prepared rebuttal report for Larsen litigation.	4.70	400.00	1,880.00
12/11/23	Jeffrey Shaw	Reviewed and updated expert rebuttal report exhibits.	7.50	355.00	2,662.50
12/11/23	Ray Strong	Analyzed case documents for preparation of Larsen rebuttal report.	1.10	400.00	440.00
12/11/23	Ray Strong	Prepared appendices for Larsen rebuttal report.	2.40	400.00	960.00
12/11/23	Ray Strong	Prepared rebuttal report for Larsen litigation.	6.40	400.00	2,560.00
12/12/23	Matthew Babcock	Reviewed Larsen rebuttal report.	0.90	370.00	333.00
12/12/23	Spencer Rawlings	Analyzed J Rust deposition support for Larsen rebuttal report.	3.90	225.00	877.50
12/12/23	Spencer Rawlings	Analyzed Larsen investor activity for expert report.	0.70	225.00	157.50



INVOICE

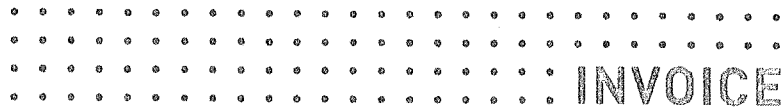
To: Jonathan O. Hafen
 c/o: Parr Brown Gee & Loveless
 RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/12/23	Spencer Rawlings	Reviewed Larsen rebuttal report.	1.10	225.00	247.50
12/12/23	Jeffrey Shaw	Reviewed Larsen rebuttal report, exhibits and appendices.	5.60	355.00	1,988.00
12/12/23	Jeffrey Shaw	Discussions regarding Larsen rebuttal report.	1.00	355.00	355.00
12/12/23	Jeffrey Shaw	Call with counsel regarding Larsen rebuttal report.	0.30	355.00	106.50
12/12/23	Ray Strong	Analyzed case documents for preparation of Larsen rebuttal report.	0.90	400.00	360.00
12/12/23	Ray Strong	Prepared appendices for Larsen rebuttal report.	4.10	400.00	1,640.00
12/12/23	Ray Strong	Attended call regarding Larsen rebuttal report.	0.70	400.00	280.00
12/12/23	Ray Strong	Attended call with counsel regarding Larsen rebuttal report.	0.30	400.00	120.00
12/12/23	Ray Strong	Prepared rebuttal report for Larsen litigation.	6.30	400.00	2,520.00
12/13/23	Spencer Rawlings	Prepared appendices for Larsen rebuttal report.	5.90	225.00	1,327.50
12/13/23	Jeffrey Shaw	Reviewed Larsen rebuttal report, exhibits, and appendices.	0.50	355.00	177.50
12/13/23	Ray Strong	Prepared appendices for Larsen rebuttal report.	3.50	400.00	1,400.00
12/13/23	Ray Strong	Prepared rebuttal report for Larsen litigation.	6.40	400.00	2,560.00
12/14/23	Spencer Rawlings	Finalized Larsen rebuttal report.	1.60	225.00	360.00
12/14/23	Ray Strong	Finalized Larsen rebuttal report.	1.10	400.00	440.00
Total for Task Code 500			423.80		141,497.00

Task Code: 600 - Tax Compliance & Analysis

12/05/23	Vernon Calder	Resolved tax issues regarding Zion's Bank independent settlement with investors which is to be administered by the Receiver.	0.20	440.00	88.00
12/19/23	Spencer Rawlings	Researched requirement to open tax withholding account and how to receive SUTA tax rate for receivership.	1.90	225.00	427.50



INVOICE

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

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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
12/20/23	Vernon Calder	Researched IRS publications to determine federal income tax withholding requirements to be applied to wage claim distributions to be made in 2023.	0.30	440.00	132.00
12/20/23	Leif Larsen	Prepared employee check detail reports to be provided to wage claim recipients.	1.50	355.00	532.50
12/20/23	Leif Larsen	Analyzed wage claims and prepared withholding schedules.	1.60	355.00	568.00
12/20/23	Leif Larsen	Prepared employee and check databases to be imported into the 2023 payroll software.	2.60	355.00	923.00
Total for Task Code 600			8.10		2,671.00
Task Code: 940 - Hearing Preparation / Attendance					
10/12/23	Jeffrey Shaw	Prepared for and attended claims objection hearing.	2.70	355.00	958.50
Total for Task Code 940			2.70		958.50
Task Code: 950 - Fee Application Preparation & Hearing					
11/14/23	Jeffrey Shaw	Reviewed time entries and descriptions for Jul-Sep bill.	1.30	0.00	N/C
11/20/23	Jeffrey Shaw	Reviewed Q3 bill.	0.50	0.00	N/C
11/22/23	Jeffrey Shaw	Reviewed, finalized and submitted Q3 invoice.	0.50	0.00	N/C
12/06/23	Jeffrey Shaw	Reviewed, finalized and submitted fee application narrative for Q3.	0.50	0.00	N/C
Total for Task Code 950			2.80		0.00
Professional Services			532.90		178,699.00

EXHIBIT D

EXHIBIT D

TWENTY-FIRST INTERIM FEE APPLICATION

Time Records of Arizona Counsel

EXHIBIT D

SacksTierney P.A.

A T T O R N E Y S

4250 North Drinkwater Boulevard | Fourth Floor | Scottsdale, Arizona 85251-3693 | 480.425.2600 | Fax 480.970.4610 | www.sackstierney.com

Parr Brown Gee & Loveless
 101 South 200 East Ste. 700
 Salt Lake City, UT 84111

Attention: **Matthew J. Ball**

October 03, 2023
 Client: PA123
 Matter: 00007
 Invoice #: 1298659

Page: 1

RE: Jonathan Hafen v. Leslie & Gretchen Howell

For Professional Services Rendered Through September 30, 2023

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
09/05/2023	MMD	Email correspondence with Attorney Harris (.1); legal research and analysis re foreign subpoenas (.4).	0.50	\$285.00	\$142.50
09/15/2023	MMD	Review article regarding homestead exemption (.4).	0.40	\$285.00	\$114.00
09/15/2023	SDE	[NO CHARGE] Research rules and laws relating to registration of foreign district court judgment, including 28 USC Sec. 1963 and form AO 451; email to Attorney Harris concerning same.	0.70	\$0.00	\$0.00
Total Professional Services			1.60		\$256.50

SUMMARY

		Hours	Rate	Amount
MMD	Mea M. Donnelly	0.90	\$285.00	\$256.50
SDE	Susan D. Ensslin	0.70	\$0.00	\$0.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
09/30/2023	Administrative Expense	\$12.83
Total Disbursements		\$12.83

October 03, 2023
Client: PA123
Matter: 00007
Invoice #: 1298659

SacksTierneyP.A.
ATTORNEYS

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Total Services	\$256.50	
Total Disbursements	\$12.83	
Total Current Charges		\$269.33
PAY THIS AMOUNT		\$269.33

ADDITIONAL COSTS MAY BE BILLED AT A LATER DATE
PAYABLE UPON RECEIPT
THE FIRM RESERVES THE RIGHT TO CHARGE INTEREST
AT A RATE OF TEN PERCENT PER ANNUM ON ACCOUNTS 30 DAYS IN ARREARS

Sacks Tierney P.A.

ATTORNEYS

4250 North Drinkwater Boulevard | Fourth Floor | Scottsdale, Arizona 85251-3693 | 480.425.2600 | Fax 480.970.4610 | www.sackstierney.com

Parr Brown Gee & Loveless
 101 South 200 East Ste. 700
 Salt Lake City, UT 84111

Attention: Matthew J. Ball

November 02, 2023
 Client: PA123
 Matter: 00007
 Invoice #: 1299444

Page: 1

RE: Jonathan Hafen v. Leslie & Gretchen Howell

For Professional Services Rendered Through October 31, 2023

Federal I.D. No.: 86-0493876

SERVICES

Date	Description of Services	Hours	Rate	Amount
10/19/2023	SDE Telephone call to Matt Ball re status of sending original certified copy of judgment for domestication (LVM); subsequent telephone conference with Mr. Ball regarding issues with obtaining certified copy.	0.20	\$215.00	\$43.00
Total Professional Services		0.20		\$43.00

SUMMARY

		Hours	Rate	Amount
SDE	Susan D. Ensslin	0.20	\$215.00	\$43.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
10/31/2023	Administrative Expense	\$2.15
Total Disbursements		\$2.15

November 02, 2023
Client: PA123
Matter: 00007
Invoice #: 1299444

Page: 2

SacksTierney P.A.
ATTORNEYS

Total Services	\$43.00	
Total Disbursements	\$2.15	
Total Current Charges		\$45.15
Previous Balance		\$269.33
PAY THIS AMOUNT		\$314.48

ADDITIONAL COSTS MAY BE BILLED AT A LATER DATE
PAYABLE UPON RECEIPT
THE FIRM RESERVES THE RIGHT TO CHARGE INTEREST
AT A RATE OF TEN PERCENT PER ANNUM ON ACCOUNTS 30 DAYS IN ARREARS

SacksTierney P.A.

ATTORNEYS

4250 North Drinkwater Boulevard | Fourth Floor | Scottsdale, Arizona 85251-3693 | 480.425.2600 | Fax 480.970.4610 | www.sackstierney.com

Parr Brown Gee & Loveless
 101 South 200 East Ste. 700
 Salt Lake City, UT 84111

Attention: Matthew J. Ball

December 04, 2023
 Client: PA123
 Matter: 00007
 Invoice #: 1300297

Page: 1

RE: Jonathan Hafen v. Leslie & Gretchen Howell

For Professional Services Rendered Through November 30, 2023

Federal I.D. No.: 86-0493876

SERVICES

Date	Description of Services	Hours	Rate	Amount
11/13/2023	SDE Draft Affidavit Substantiating a Foreign Judgment, Notice of Filing a Foreign Judgment, and Affidavit of Mailing.	1.10	\$215.00	\$236.50
Total Professional Services		1.10		\$236.50

SUMMARY

	Hours	Rate	Amount
SDE Susan D. Ensslin	1.10	\$215.00	\$236.50

DISBURSEMENTS

Date	Description of Disbursements	Amount
11/30/2023	Administrative Expense	\$11.82
Total Disbursements		\$11.82

Total Services	\$236.50
Total Disbursements	\$11.82
Total Current Charges	\$248.32
Previous Balance	\$314.48
Current Interest	\$2.24
PAY THIS AMOUNT	\$565.04

December 04, 2023
Client: PA123
Matter: 00007
Invoice #: 1300297

SacksTierneyP.A.
ATTORNEYS

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ADDITIONAL COSTS MAY BE BILLED AT A LATER DATE
PAYABLE UPON RECEIPT
THE FIRM RESERVES THE RIGHT TO CHARGE INTEREST
AT A RATE OF TEN PERCENT PER ANNUM ON ACCOUNTS 30 DAYS IN ARREARS

SacksTierney P.A.

ATTORNEYS

4250 North Drinkwater Boulevard | Fourth Floor | Scottsdale, Arizona 85251-3693 | 480.425.2600 | Fax 480.970.4610 | www.sackstierney.com

Parr Brown Gee & Loveless
 101 South 200 East Ste. 700
 Salt Lake City, UT 84111

Attention: Matthew J. Ball

January 03, 2024
 Client: PA123
 Matter: 00007
 Invoice #: 1301043

Page: 1

RE: Jonathan Hafen v. Leslie & Gretchen Howell

For Professional Services Rendered Through December 31, 2023

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
12/04/2023	JWA	Email from Ms. Ensslin re enforcement of Utah District Court judgment in Arizona; review prior research; email to and office conference with Ms. Ensslin re same.	0.50	\$515.00	\$257.50
12/06/2023	SDE	Obtain and draft District Court Form JS 44 Civil Cover Sheet; email same to Mr. Harris to review and/or complete.	0.80	\$215.00	\$172.00
12/07/2023	MJH	Research re judgment registration and reviewed and revised registration.	1.10	\$365.00	\$401.50
12/07/2023	SDE	Revise District Court Form JS 44 Civil Cover Sheet and arrange to have Judgment registered in Arizona District Court.	0.50	\$215.00	\$107.50
12/13/2023	SDE	Register foreign judgment in District Court - filing voided due to incorrect category.	0.80	\$215.00	\$172.00
12/14/2023	SDE	Register Utah Amended Judgment with Arizona District Court.	0.30	\$215.00	\$64.50
12/21/2023	SDE	Prepare Judgment Creditor's Information Statement, and digitally record Amended Judgment with Mohave County Recorder.	0.70	\$215.00	\$150.50
12/22/2023	MTR	Review property documents in Mojave County; emails with Michael Harris regarding same.	1.80	\$205.00	\$369.00
Total Professional Services			6.50		\$1,694.50

January 03, 2024
 Client: PA123
 Matter: 00007
 Invoice #: 1301043

SacksTierney P.A.
 ATTORNEYS

Page: 2

SUMMARY

		Hours	Rate	Amount
JWA	James W. Armstrong	0.50	\$515.00	\$257.50
MJH	Michael J. Harris	1.10	\$365.00	\$401.50
MTR	Mallory T. Rasmussen	1.80	\$205.00	\$369.00
SDE	Susan D. Ensslin	3.10	\$215.00	\$666.50

DISBURSEMENTS

Date	Description of Disbursements	Amount
12/13/2023	Arizona District Court - Filing Fee	\$405.00
12/14/2023	Arizona District Court - Filing Fee	\$52.00
12/31/2023	Administrative Expense	\$84.72

	Total Disbursements	\$541.72
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	Total Services	\$1,694.50
	Total Disbursements	\$541.72
	Total Current Charges	\$2,236.22
	Previous Balance	\$565.04
	Current Interest	\$2.62

	PAY THIS AMOUNT	\$2,803.88
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ADDITIONAL COSTS MAY BE BILLED AT A LATER DATE
PAYABLE UPON RECEIPT
THE FIRM RESERVES THE RIGHT TO CHARGE INTEREST
AT A RATE OF TEN PERCENT PER ANNUM ON ACCOUNTS 30 DAYS IN ARREARS

EXHIBIT E

EXHIBIT E

TWENTY-FIRST INTERIM FEE

APPLICATION

Proposed Order

EXHIBIT E

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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.

**ORDER GRANTING TWENTY-FIRST
INTERIM FEE APPLICATION**

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

Judge Tena Campbell

Magistrate Judge Dustin Pead

Before the Court is the twenty-first 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”), Sacks Tierney P.A. (“Arizona Counsel”), and the Receiver’s accountants, Berkeley Research Group (“BRG”), for the period of October 1, 2023, through December 31, 2023 (the “Application Period”), and authorization to pay all allowed fees and expenses from funds of the Receivership Estate.

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

IT IS HEREBY ORDERED that:

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

Receiver, Parr Brown, and BRG, as follows:

- a. Receiver: \$17,003.50 for fees and expenses.
- b. Parr Brown: \$258,611.36 for fees and expenses.
- c. BRG: \$178,699.00 for fees and expenses.
- d. Arizona Counsel: \$2,803.88 for fees and expenses.

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 March 2024.

Honorable Dustin B. Pead
United States Magistrate Judge