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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-SIXTH 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-sixth 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 January 1, 2025, through March 31, 2025 (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-Sixth Quarterly Status Report*, which includes a status report for the period of January 1, 2025, through March 31, 2025 (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.

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.

¹ Docket No. 566 filed April 24, 2025.

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

- a. Receiver: From January 1, 2025, through March 31, 2025, the Receiver billed a total of 37.6 hours for services to the Receivership Estate. The Receiver is seeking

approval for the payment of fees and expenses totaling \$19,364.00. *See Exhibit A.*

b. Parr Brown: From January 1, 2025, through March 31, 2025, Parr Brown billed a total of 265.2 hours for legal services to the Receivership Estate. Parr Brown is seeking approval for the payment of fees and expenses totaling \$110,935.69. *See Exhibit B.* These amounts include a voluntary write down of \$10,535.50. In addition and as previously represented to the Court, Parr Brown wrote down all fees related to the memorandum opposing AG Tsunami, et al.'s motion to reconsider and dismiss.

c. BRG: From January 1, 2025, through March 31, 2025, BRG billed a total of 335 hours providing forensic, tax, and general accounting services to the Receivership Estate. BRG is seeking approval for the payment of fees and expenses totaling \$131,772.85. *See Exhibit C.* These amounts include a voluntary write down of \$1,760.00.

d. Arizona Counsel: From January 1, 2025, through March 31, 2025, Arizona Counsel billed a total of 35.6 hours for legal services to the Receivership Estate. Arizona Counsel is seeking approval for the payment of fees and expenses totaling \$14,733.50. *See Exhibit D.*

11. The amounts requested reflect a total of \$12,295.50 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 also worked with his legal counsel in several litigation matters with Claw Back Defendants. The Receiver continued coordinating with investors and their counsel to substantiate various metal transactions that were associated with such investors.

Exhibit A-3 Claims Administration

19. The Receiver and his team have completed the claims analysis process and are focused on resolving all remaining outstanding claims.

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), and the Receiver's ongoing settlement efforts, this quarter the Receiver entered into three settlement agreements that will bring in \$167,500 and recovered approximately \$217,800 on these and prior settlement agreements. 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 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 three 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.

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

26. BRG continued 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.

Claims Process & Distribution

27. BRG continued to monitor and update the distribution model with payment data and review the status of the distributions made to date by the Receiver.

Recovery Litigation

28. BRG has continued to be involved in assisting the Receiver in various litigation matters. BRG has analyzed the activity and transactions, including supporting documents, for various investors for whom the Receiver has filed clawback actions. BRG has met with the Receiver and his counsel to discuss various issues associated with these matters. BRG has also prepared support, declarations, expert reports and exhibits in connection with various of these litigation matters in which the Receiver is involved.

29. BRG has continued to work with the Receiver and his counsel to analyze and review various litigation issues, including preparation of summary judgment motions, default judgements, 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 amounts sought by the Receiver.

Tax Compliance and Analysis

30. BRG reviewed, prepared, and submitted the required filings for the federal and state payroll tax returns for Q4 2024 in connection with the distributions made related to the wage claims of former employees of Rust Rare Coin. BRG also prepared 2024 Forms W-2 for all relevant payees. BRG reviewed, prepared and distributed Forms 1099 for 2024. BRG reviewed and followed up with state taxing authorities on issues related to Receivership entities. BRG also reviewed, researched and responded to Receiver inquiries regarding various tax issues as requested.

Exhibit D-Time Records of Arizona Counsel

31. 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. Arizona Counsel previously initiated foreclosure proceedings which were stifled due to the filing of a bankruptcy by the net winners. Arizona Counsel is currently working with the Receiver and his team to have the bankruptcy dismissed so that the foreclosure proceedings can move forward.

VI. PRIOR REQUESTS AND INTERIM NATURE OF REQUEST

32. The Receiver has previously filed twenty-five interim fee applications,² all of

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

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, 530, 534, 544, 554, 558 and 564. This is the Twenty-Sixth Interim Fee Application of the Receiver and his professionals. The Receiver and his professionals understand that the authorization and payment of fees and expenses is interim in nature. All fees and expenses allowed on an interim basis will be subject to final review at the close of the case and the discharge of the Receiver when the Receiver files a final accounting and the Receiver and his professional's file final fee applications.

41. For the reasons set forth above, and as supported by the Exhibits attached hereto, the Receiver respectfully submits that the fees and expenses requested herein are for actual services that were necessary for and beneficial to the administration of the Receivership Estate. The Receiver has made every attempt to limit the administrative expenses of 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

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. The Receiver's Twenty-First Interim Fee Application was filed on March 13, 2024. *See* Dkt. No. 533. The Receiver's Twenty-Second Interim Fee Application was filed on March 13, 2024. *See* Dkt. No. 543. The Receiver's Twenty-Third Interim Fee Application was filed on September 11, 2024. *See* Dkt. No. 553. The Receiver's Twenty-Fourth Interim Fee Application was filed on December 16, 2024. *See* Dkt. No. 557. The Receiver's Twenty-Fifth Interim Fee Application was filed on March 21, 2025. *See* Dkt. No. 563

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 \$19,364.00; Parr Brown's fees and expenses in the amount of \$110,935.69; BRG's fees and expenses in the amount of \$131,772.85; Arizona Counsel's fees and expenses in the amount of \$14,733.50, 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 23rd day of June 2025.

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 GROUPBy: /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-SIXTH INTERIM FEE APPLICATION** was (1) electronically filed with the Clerk of the Court through the CM/ECF system on June 23, 2025, which sent notice of the electronic filing to all counsel of record, (2) posted on the Receiver's website (rustrarecoinreceiver.com), and (3) emailed to all those on the Receiver's master mailing matrix.

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/s/ Lori Stumpf

EXHIBIT A

EXHIBIT A

TWENTY-THIRD INTERIM FEE APPLICATION

Time Records of Receiver

EXHIBIT A

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

Rust Rare Coin Receiver

May 28, 2025

Invoice: 962142
Client: 177110
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration

Professional Services	\$ 1,699.50
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 1,699.50

PARR BROWN GEE & LOVELESS

Invoice: 962142
Rust Rare Coin Receiver
Administration

May 28, 2025
Client: 177110
Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/17/25	JOH	Attention to clawback action; Follow up re tax matter; Follow up re expert invoice	1.00	515.00
1/22/25	JOH	Attention to bankruptcy matter; Email with Arizona counsel re same; Email with Utah counsel re same; Attention to banking transaction; Follow up re status of clawback action; Review related documents	1.30	669.50
2/10/25	JOH	Attention to bankruptcy matter; Review documents re clawback action and potential resolution	.70	360.50
3/03/25	JOH	Attention to inquiry from claimant re status of receivership; Follow up re potential clawback settlement	.30	154.50

TOTAL PROFESSIONAL SERVICES \$ 1,699.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	515.00	3.30	1,699.50
TOTALS		3.30	\$ 1,699.50

TOTAL THIS INVOICE \$ 1,699.50

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

May 28, 2025

Rust Rare Coin Receiver

Invoice: 962142
Client: 177110
Matter: 1

REMITTANCE ADVICE**RE: Administration**

BALANCE DUE THIS INVOICE**\$ 1,699.50**

Please return this advice with payment to:

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

Wire Transfer Instructions

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

E-Check

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

EFT/ACH Pay Instructions

Routing #: 124001545
Account #: 912454114

3% fee for credit card transactions*Please reference your invoice # 962142**

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

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



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

Rust Rare Coin Receiver

May 28, 2025

Invoice: 962143
Client: 177110
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Assett Analysis & Recovery

Professional Services	\$ 16,840.50
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 16,840.50

PARR BROWN GEE & LOVELESS

Invoice: 962143
Rust Rare Coin Receiver
Asset Analysis & Recovery

May 28, 2025
Client: 177110
Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/03/25	JOH	Attention to two clawback actions; Review email correspondence and related documents concerning same; Attention to tax matter; Review related email correspondence	1.30	669.50
1/06/25	JOH	Attention to victim payment issue; Attention to clawback action; Follow up re bankruptcy issue; Review related email correspondence and analyze rule	1.40	721.00
1/16/25	JOH	Attention to two clawback actions; Review related documents; Meet with counsel for clawback defendant	1.20	618.00
1/21/25	JOH	Attention to clawback action; Meet with legal counsel re various matters; Review documents relating to potential resolution of clawback action	1.30	669.50
1/24/25	JOH	Attention to clawback settlement payment; Review related documents	.40	206.00
1/27/25	JOH	Attention to two clawback actions; Email with legal counsel re potential settlement of claim; Review documents	1.40	721.00
1/30/25	JOH	Attention to potential settlement of clawback action; Review and analyze report; Email with legal counsel re same; Attention to potential sale of various assets	1.40	721.00
2/05/25	JOH	Attention to four clawback claims; Email with legal counsel re same; Follow up re personal property question	.80	412.00
2/11/25	JOH	Further attention to resolution of multiple clawback claims; Review related documents and email correspondence; Further follow up re multiple bankruptcy matters; Email with legal counsel re same	2.10	1,081.50
2/12/25	JOH	Attention to clawback action; Email with legal counsel re dispute with clawback defendant and related matters	1.30	669.50
3/02/25	JOH	Attention to potential settlement of clawback action; Review related document and relating email communications	.60	309.00
3/04/25	JOH	Attend to two clawback actions; Review related documents and email correspondence; Review bankruptcy pleadings and related email correspondence; Review settlement agreement; Email with legal counsel re same	1.40	721.00
3/05/25	JOH	Prepare for and participate in meeting with legal counsel re various clawback actions; Review related documents; Follow up re tax matter; Review pleadings and court order	1.80	927.00
3/06/25	JOH	Attend to multiple clawback actions; Follow up re timeline for wrap-up of receivership; Prepare for and meet with legal counsel; Review bankruptcy filings	2.20	1,133.00
3/07/25	JOH	Attend to various clawback actions; Review related documents and email correspondence; Analyze potential settlement offer; Email with legal counsel re same; Follow up re bankruptcy matter; Email with legal counsel re same; Prepare for and participate for upcoming meeting with clawback defendants and claimants	3.10	1,596.50
3/10/25	JOH	Attend to two clawback actions; Prepare for meeting with group of clawback defendants and claimants	1.10	566.50

PARR BROWN GEE & LOVELESS

Invoice: 962143
Rust Rare Coin Receiver
Asset Analysis & Recovery

May 28, 2025
Client: 177110
Matter: 2

Date	Tkpr	Description	Hours	Amount
3/11/25	JOH	Prepare for meeting with multiple claimants and clawback defendants; Review related documents and email correspondence	1.10	566.50
3/12/25	JOH	Prepare for and participate in meeting with clawback defendants and counsel relating to numerous clawback actions; Review related documents; Meet with legal counsel re foregoing	2.70	1,390.50
3/13/25	JOH	Attend to clawback action; Email with legal counsel re clawback defendant conduct and related matters	.60	309.00
3/21/25	JOH	Attend to multiple clawback actions; Review related documents; Email with legal counsel re potential settlement; Analyze offer	1.20	618.00
3/28/25	JOH	Review documents relating to multiple clawback defendants; Attend to potential resolution of clawback settlement	1.10	566.50
3/29/25	JOH	Email with legal counsel re claimant inquiry	.10	51.50
3/31/25	JOH	Attend to two clawback actions; Review related documents and email correspondence; Analyze financial condition of clawback defendant for purposes of potential settlement; Email with legal counsel re resolving potential dispute with title company; Follow up re request from Arizona counsel; Prepare for meeting re multiple clawback actions and potential settlements	3.10	1,596.50

TOTAL PROFESSIONAL SERVICES

\$ 16,840.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	515.00	32.70	16,840.50
TOTALS		32.70	\$ 16,840.50

TOTAL THIS INVOICE

\$ 16,840.50

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

Rust Rare Coin Receiver

May 28, 2025

Invoice: 962143
Client: 177110
Matter: 2

REMITTANCE ADVICE**RE: Assett Analysis & Recovery**

BALANCE DUE THIS INVOICE**\$ 16,840.50**

Please return this advice with payment to:

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

Wire Transfer Instructions

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

E-Check

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

EFT/ACH Pay Instructions

Routing #: 124001545
Account #: 912454114

3% fee for credit card transactions*Please reference your invoice # 962143**

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

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



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

Rust Rare Coin Receiver

May 28, 2025

Invoice: 962144
Client: 177110
Matter: 3

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Disposition of Assets

Professional Services	\$ 824.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 824.00

PARR BROWN GEE & LOVELESS

Invoice: 962144
Rust Rare Coin Receiver
Disposition of Assets

May 28, 2025
Client: 177110
Matter: 3

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
2/02/25	JOH	Analyze options re liquidation of remaining assets; Email with legal counsel re various matters; Follow up re clawback action	.80	412.00
2/03/25	JOH	Attention to bankruptcy matter; Review related documents; Email with legal counsel re same; Follow up with legal counsel re asset disposition matters	.80	412.00

TOTAL PROFESSIONAL SERVICES \$ 824.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	515.00	1.60	824.00
TOTALS		1.60	\$ 824.00

TOTAL THIS INVOICE \$ 824.00

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

May 28, 2025

Rust Rare Coin Receiver

Invoice: 962144
Client: 177110
Matter: 3

REMITTANCE ADVICE**RE: Disposition of Assets**

BALANCE DUE THIS INVOICE**\$ 824.00**

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EXHIBIT B

EXHIBIT B TWENTY-THIRD INTERIM FEE APPLICATION Time Records of Parr Brown

EXHIBIT B

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

Rust Rare Coin Receivership

May 28, 2025

Invoice: 962138
Client: 176430
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration of Receivership Estate

Professional Services	\$ 7,569.50
Total Costs Advanced	<u>\$ 162.51</u>
TOTAL THIS INVOICE	\$ 7,732.01

PARR BROWN GEE & LOVELESS

Invoice: 962138
Rust Rare Coin Receivership
Administration of Receivership Estate

May 28, 2025
Client: 176430
Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/08/25	JMC	Correspond with Jeff Shaw re Writer's Den information	.10	48.50
1/10/25	JMC	Correspond with Jeff Shaw re Writer's Den related issues; Review settlement documents	.50	242.50
1/13/25	WOP	Review docket; Correspond with attorneys re updates for quarterly report	1.20	408.00
1/17/25	JMC	Correspond with Jeff Balls and Jon Hafen re payment issues and distribution; Review order terminating the stay	.50	242.50
1/20/25	WOP	Review attorney time sheets; Continue draft of quarterly report	3.20	1,088.00
1/21/25	WOP	Office conference with Jeff re updates for quarterly report; Correspond with Kathy re quarterly ledger; Review quarterly ledger; Continue draft of quarterly report	3.80	1,292.00
1/22/25	WOP	Correspondence re quarterly report	.30	102.00
1/24/25	WOP	Correspond with Jeff re quarterly report; Finish report; Create related exhibits	.90	306.00
1/27/25	JMC	Correspond with Jeff Balls re quarterly report	.10	48.50
1/27/25	WOP	Redact quarterly ledger report to remove names of claimants receiving distributions; Email correspondence with Joe and Jeff Balls	1.30	442.00
1/29/25	JMC	Correspond with Jeff Balls re quarterly report	.30	145.50
1/29/25	WOP	No Charge - Review and redact attorney time sheets for fee application; Correspond with BRG re fee application	4.40	N/C
1/30/25	JMC	Review and revise quarterly report; Correspond with Jon Hafen and Jeff Balls re collection and sale of Josh Rust assets	1.60	776.00
1/30/25	WOP	No Charge - Review and redact BRG time sheets for fee application; Review previous fee applications re necessary redactions	2.10	N/C
1/31/25	WOP	No Charge - Review attorney time sheets; Redact the same; Correspond with Arizona counsel; Correspond with conflict receiver;	2.60	N/C
2/03/25	JMC	Correspond with Jon Hafen and Jeff Balls re Josh Rust items	.10	48.50
2/10/25	WOP	No Charge - Call with Arizona counsel; Redact time sheets; Correspond with Caralee re same	3.10	N/C
2/11/25	WOP	No Charge - Review and analyze Arizona time sheets re discrepancy in billing records; Emails re same	1.90	N/C
2/12/25	JMC	Review and analyze information from Darren Nelson; Correspond with Claire McGuire and others re the same	.60	291.00
2/17/25	WOP	No Charge - Continue draft of fee application; Email correspondence re same	2.80	N/C
2/18/25	WOP	No Charge - Continue draft of fee application; Review docket report; Continue review and redaction of time sheets	2.70	N/C
2/21/25	WOP	No Charge - Redact BRG's time sheets; Revise BRG narrative for fee application	1.90	N/C
2/26/25	WOP	No Charge - Finish draft of fee application; Create exhibits; Draft proposed order; Correspondence re same	3.40	N/C

PARR BROWN GEE & LOVELESS

Invoice: 962138
Rust Rare Coin Receivership
Administration of Receivership Estate

May 28, 2025
Client: 176430
Matter: 1

Date	Tkpr	Description	Hours	Amount
3/05/25	WOP	No Charge - Email to Jeff re fee application; Email to Joe re same	.20	N/C
3/07/25	JMC	Review recently deposited checks; Correspond with Kathy Bates re the same	.10	48.50
3/07/25	JAB	No Charge - Review application for attorney fees	.50	N/C
3/11/25	JMC	No Charge - Correspond with Jeff Balls and Jon Hafen re fee application; Correspond with the government re the same	.70	N/C
3/18/25	JMC	No Charge - Correspond with Jeff Balls and the government re fee application	.20	N/C
3/19/25	JMC	No Charge - Correspond with Jeff Balls and government re fee application	.20	N/C
3/19/25	WOP	No Charge - Review invoices for Arizona counsel to determine discrepancy between billed and paid amounts; Email to Joe and Jeff re same	1.40	N/C
3/19/25	WOP	Review docket history; Prepare template for quarterly report; Correspond with attorneys re updates to be included in next report	2.60	884.00
3/21/25	JMC	No Charge - Correspond with Tom Simek and Jeff Balls about Rust fee application approval	.10	N/C
3/21/25	JAB	No Charge - Review and finalize attorney fees	.70	N/C
3/24/25	JMC	No Charge - Review order approving fee application; Correspond with Jef Balls re the same	.30	N/C
3/24/25	JAB	No Charge - Review attorney fees	.70	N/C
3/24/25	WOP	Attend to various tasks in preparation for quarterly report; Review prior reports; Continue draft of same	3.40	1,156.00

TOTAL PROFESSIONAL SERVICES**\$ 7,569.50****SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Joseph M R Covey	485.00	3.90	1,891.50
Walter O Peterson	340.00	16.70	5,678.00
TOTALS		20.60	\$ 7,569.50

COSTS ADVANCED

Date	Description	Amount
1/21/25	Grasshopper.com	19.43
2/21/25	Grasshopper - Michael Anderson	19.34
3/21/25	Grasshopper - Michael Anderson	19.49
3/24/25	Constable Reitz - RUSH service of summons on Sara Leonard, as personal representative of the estate of Mary Wade	104.25

PARR BROWN GEE & LOVELESS

Invoice: 962138
Rust Rare Coin Receivership
Administration of Receivership Estate

May 28, 2025
Client: 176430
Matter: 1

TOTAL COSTS ADVANCED \$ 162.51

TOTAL THIS INVOICE \$ 7,732.01

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

May 28, 2025

Rust Rare Coin Receivership

Invoice: 962138
Client: 176430
Matter: 1

REMITTANCE ADVICE**RE: Administration of Receivership Estate**

BALANCE DUE THIS INVOICE**\$ 7,732.01**

Please return this advice with payment to:

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

Wire Transfer Instructions

JP Morgan Chase Bank
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Parr Brown Gee & Loveless
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E-Check

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

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

Rust Rare Coin Receivership

May 28, 2025

Invoice: 962139
Client: 176430
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Asset Analysis & Recovery

Professional Services	\$ 94,375.00
Total Costs Advanced	<u>\$ 3,523.68</u>
TOTAL THIS INVOICE	\$ 97,898.68

PARR BROWN GEE & LOVELESS

Invoice: 962139
Rust Rare Coin Receivership
Asset Analysis & Recovery

May 28, 2025
Client: 176430
Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/02/25	JMC	Review and schedule dates for several clawback actions; Review status request in Powell case; Correspond with Jim Samuelson and Jeff Balls re same	.90	436.50
1/02/25	MTH	Review and respond to correspondence from Darren Nelson and Joe Covey re OPC complaint and bankruptcy	.20	92.00
1/02/25	JAB	Correspond with counsel; Review pleadings	.20	84.00
1/02/25	CMM	Communicate with Joseph Covey re discovery issues with Nelson proceeding; Communicate with Thomas Melton and Peter Guyon re stipulated extension and edits to the same; Draft meet and confer email to Oberhansly counsel; Revise filing re the same	4.40	1,474.00
1/02/25	JWN	No Charge - Continue to draft opposition to defendants AG Tsunami, et al.'s motion to reconsider and to dismiss for insufficient service of process; Review cases re insufficient service of process, time extensions under Rule 4(m), and dismissals with prejudice under Rule 4(m)	4.30	N/C
1/02/25	CY	Email correspondence with ICU re final attempts with T Chard, K Karkra and Silver Shoes; Email correspondence with Thomas Melton re filing non-served affidavit with courts; Email correspondence with staff re mailing out complaints, summons and order; Research Xchange for possible court cases re B. Baker; Email correspondence with staff re process server to try new updated address; Cont	2.10	430.50
1/02/25	TMM	Review service of process status for Fields and Sargent Group. Review status of personal service; Follow up on Guyon stipulation for expert witness disclosure;	1.20	540.00
1/02/25	TMM	Review service on Sargent and Fields group; Review stipulation for extension of time in Guyon matter	.50	225.00
1/03/25	JMC	Correspond with Jeff Balls re collection of judgment; Review various claw back pleadings	.20	97.00
1/03/25	JAB	Correspond with James Samuelson	.10	42.00
1/03/25	CMM	Research extension of fact discovery issue for Guyon case; Revise stipulation and order; Communicate re the same with Thomas Melton; Communicate with opposing counsel re the same; Attorney conference re current claw back actions; Research collection action in Haddock matter; Review communications re the same	6.40	2,144.00
1/03/25	JWN	No Charge - Continue to draft memorandum opposing defendants AG Tsunami, et al.'s motion to reconsider and to dismiss for insufficient service of process; Continue to review cases re insufficient service of process, time extensions under Rule 4(m), and dismissals with prejudice under Rule 4(m)	6.00	N/C
1/03/25	CY	Multiple email correspondence with Thomas Melton re update on process servers; Phone conference with ICU Investigations re remaining people to serve summons and complaint to; Email correspondence with staff re mailing out orders, summons and complaints; Email correspondence with Thomas Melton re who was served after 12/27 date	1.20	246.00

PARR BROWN GEE & LOVELESS

Invoice: 962139
Rust Rare Coin Receivership
Asset Analysis & Recovery

May 28, 2025
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
1/04/25	JWN	No Charge - Continue to draft memorandum opposing defendants AG Tsunami, et al.'s motion to reconsider and to dismiss for insufficient service of process; Continue to review relevant authority	5.10	N/C
1/05/25	JWN	No Charge - Revise memorandum opposing defendants AG Tsunami, et al.'s motion to reconsider and to dismiss for insufficient service of process	.80	N/C
1/06/25	JMC	Correspond with Jeff Balls and Jon Hafen re payment issues on adversary	.10	48.50
1/06/25	CMM	Communicate with opposing counsel in Guyon matter re close of fact discovery and various edits to stipulated motion; Revise and draft stipulated motion; Communicate with Parr Brown team re the same; Research additional claims issues	2.80	938.00
1/06/25	JWN	No Charge - Continue to revise memorandum opposing defendants AG Tsunami, et al.'s motion to reconsider and to dismiss for insufficient service of process; Review relevant cases re extensions under Rule 4(m); Review memorandum for accuracy and errors	3.20	N/C
1/06/25	CY	Continue reviewing who has been served; Phone conference with ICU Investigations re remaining people to serve summons and complaint to; Email correspondence with staff re mailing out orders, summons and complaints	2.20	451.00
1/06/25	LH	Review emails from claimants re most recent distribution checks and respond to same; Review returned distribution checks	.10	23.50
1/07/25	JMC	Correspond with Jeff Balls re additional filings in claw backs; Correspond with Michael Hoppe re Nelson case and response	1.30	630.50
1/07/25	MTH	Conference with Joe Covey re Nelson matter and response	.50	230.00
1/07/25	CMM	Review communications with claimant re distribution issues; Communicate with potential claw back defendant re potential settlement; Draft settlement agreement; Communicate with opposing counsel in the Nelson matter re rejection of settlement; Review potential revised stipulation	4.60	1,541.00
1/07/25	JWN	No Charge - Continue to revise memorandum opposing defendants AG Tsunami, et al.'s motion to reconsider and to dismiss for insufficient service of process; Review relevant cases re extensions under Rule 4(m); Prepare exhibits; Analyze the strengths and weaknesses of the memorandum; Draft email to Jeffery Balls re same	1.50	N/C
1/08/25	JMC	Correspond with G Walker and Jeff Balls re claw back action	.40	194.00
1/08/25	JAB	Correspond with James Samuelson; Telephone conference with G Walker	.40	168.00
1/08/25	CMM	Communicate with Parr Brown team re upcoming status hearing; Draft attorneys fees motion for motion to compel; Communicate with Parr team re Walker claw back and notice	1.70	569.50
1/08/25	JWN	No Charge - Final quick review of memorandum	.10	N/C
1/09/25	JMC	Correspond with Jeff Balls re identity of claw back party; Review new filings in claw back	.20	97.00

PARR BROWN GEE & LOVELESS

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Rust Rare Coin Receivership
Asset Analysis & Recovery

May 28, 2025
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Date	Tkpr	Description	Hours	Amount
1/09/25	LH	Communicate with accounting re V and S Nelson re new check for 77K needed; Email Jeff Balls re same; Review checks returned in mail to determine if forwarding address was expired or not good address	.20	47.00
1/10/25	CMM	Communicate with opposing counsel re stipulated motion to extend; Revise and draft new order re the same; Prepare the same for filing	1.20	402.00
1/10/25	CY	Update spreadsheet with tracking numbers of certified mail we sent to investors; Revise motion and order for amended scheduling order; File docs with the court; Email order to judge	.80	164.00
1/13/25	JAB	Telephone conference with claw back defendant	.40	168.00
1/13/25	CMM	Communicate with claimant re claim updates; Attorney conference with Jeffery Balls re claw back actions; Review court order re attorney fees; Communicate with Parr team re Oberhansley expert report; Review and analyze the same	3.40	1,139.00
1/13/25	TMM	No Charge - Emails re various defendants and status of service of process	.30	N/C
1/14/25	JAB	Telephone conference with defendant; Review correspondence from defendant re amount; Conference with Claire McGuire	1.20	504.00
1/14/25	JWN	No Charge - Review Thomas Melton's changes to the reply memorandum opposing AG Tsunami et al.'s motion for reconsideration and to dismiss for insufficient service of process; Email correspondence with Jeffery Balls and Thomas Melton re same; Revise reply memorandum to include Thomas Melton's revisions; Prepare redline re same	.50	N/C
1/14/25	TMM	No Charge - Revise AG Tsunami opposition to motion to dismiss	.70	N/C
1/15/25	JMC	Correspond with Jeff Balls re settlement agreement	.10	48.50
1/15/25	JAB	Telephone conference with Claire McGuire; Review settlement agreement and confession of judgment; Telephone conference with court clerk	1.50	630.00
1/15/25	CMM	Attorney conference with Jeffery Balls re remaining claw back actions; Review and revise Ault settlement agreement and confession of judgement; Communicate with expert witness re expert report in Guyon	2.60	871.00
1/15/25	JWN	No Charge - Email correspondence with Thomas Melton and Jeffery Balls re filing memorandum opposing motion to reconsider and to dismiss for insufficient service of process; Review motion to ensure that it is ready for filing	.10	N/C
1/15/25	LH	Calls to claimants re returned check and communicate with Jeff Balls re access to claims registry	.50	117.50
1/16/25	JMC	Review various pleadings in claw back actions	.10	48.50
1/16/25	JAB	Draft notice of dismissals; Correspond with court clerk; Research additional address for Walkers; Review pleadings	1.40	588.00
1/16/25	CMM	Communicate with defendant re dismissal of case; Draft attorney fee motion; Research discovery issues for claw back action; Communicate with expert re payor analysis for Guyon claw back	3.70	1,239.50

PARR BROWN GEE & LOVELESS

Invoice: 962139
Rust Rare Coin Receivership
Asset Analysis & Recovery

May 28, 2025
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Matter: 2

Date	Tkpr	Description	Hours	Amount
1/17/25	JMC	Review and analyze various claw back pleadings; Correspond with Jeff Balls re order to terminate the stay	1.00	485.00
1/17/25	JAB	Review court orders; Review correspondence from court clerk; Review pleadings	.50	210.00
1/17/25	CMM	Communicate with Robert Wing re remaining claw back actions; Research subsequent transferee issue	4.20	1,407.00
1/20/25	JAB	Correspond with Shaun Peck; Review documents	.60	252.00
1/21/25	JMC	Correspond with Jeff Balls and Jim Samuelson re Howell dismissal and legal strategy	.60	291.00
1/21/25	JAB	Telephone conference with K Karkra; Conference with Joseph Covey; Telephone conference with J Samuelson; Review order on motion to dismiss	1.30	546.00
1/21/25	CMM	Review discovery and initial disclosures in claw back action; Communicate re the same with expert witness	4.60	1,541.00
1/22/25	JMC	Correspond with Jon Hafen and Keith Hendricks re McGrath bankruptcy case and dismissal	.20	97.00
1/22/25	CMM	Review expert report questions and respond to the same from Jeff Shaw; Communicate with Parr Brown team re initial disclosures from Guyon	2.10	703.50
1/22/25	CY	Research P Guyon's initial disclosures; Email correspondence with Claire McGuire re same	.20	41.00
1/22/25	LH	Calls to claimants re returned distribution checks; Draft list of new addresses and send to Jeff Balls to add to claims registry; Prepare envelopes and put checks in the mail	1.60	376.00
1/23/25	JAB	Review correspondence re claims; Telephone conference with defendant	.80	336.00
1/23/25	CY	Create spreadsheet for Sargent and Fields re responses due; Email correspondence with staff re certified mailing and if complaints have been delivered; Email correspondence with Thomas Melton and Jeffery Balls re voicemail from K Karkra	1.20	246.00
1/23/25	TMM	Emails re various defendants and service of process	1.00	450.00
1/23/25	LH	Communicate with legal team re mailing matrix and information on distribution checks; Review returned check and compare address on check to address on claims registry; Email claimant N Berlin re same; Update claims registry with new mailing address for N Berlin and resend check to claimant	.40	94.00
1/24/25	JMC	Correspond with Matt Boley, Jeff Balls, Jim Samuelson, and others re Howell settlement offer and various legal issues; Correspond with Max Milavetz re exemption issues	2.10	1,018.50
1/24/25	JAB	Telephone conference with K Karkra; Revise quarterly report; Review correspondence re bankruptcy; Conference with Joseph Covey; Telephone conversation with defendants re claims; Review documents; Correspond with Jeff Shaw	2.20	924.00
1/24/25	MSM	Discuss caselaw analysis project with Joseph Covey re applicability of homestead exemption to fraudulent transfer collections matter	.70	196.00

PARR BROWN GEE & LOVELESS

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Date	Tkpr	Description	Hours	Amount
1/24/25	CY	Continue updating spreadsheet for deadlines; Review when USPS delivered mailed complaint and summons	1.90	389.50
1/27/25	JMC	Correspond with Jim Samuelson re Arizona judgment	.20	97.00
1/27/25	JAB	Revise quarterly report; Review correspondence re bankruptcy; Coordinate settlement agreement; Review bank information; Draft notice of dismissal; Draft discovery requests to K Tilley; Correspond with Jonathan Hafen re settlement proposal	1.80	756.00
1/27/25	MSM	Analyze Arizona caselaw re possibility of a fraudulent transfer removing statutory homestead exemption from judgment debtor's access	1.00	280.00
1/27/25	CY	Email correspondence with Thomas Melton and Jeffery Balls re Chard family not being served; Draft acceptance of service for Ryan Pahnke at RQN; Email correspondence with Thomas Melton re same; Continue to update spreadsheet; Email correspondence with Thomas Melton and Jeffery Balls re spreadsheet and updates to when answers due for defendants	1.20	246.00
1/27/25	TMM	Emails re Guyon attorney fees claims; Review status of Chard service and email to opposing counsel re acceptance of service	.30	135.00
1/27/25	LH	Prepare distribution checks and W2s for mailing to claimants and send; Email Jeff Balls re same; Update claims registry with new addresses	1.00	235.00
1/28/25	JAB	Review court order; Review motion to extend; Correspond with opposing counsel re same; Review dismissal documents	.30	126.00
1/28/25	MSM	Analyze caselaw re applicability of Arizona homestead exemption in light of fraudulent transfer origin of funds for homestead property	.60	168.00
1/28/25	CY	Revise acceptance of service with signature of Ryan Pahnke; Email correspondence with Thomas Melton re same	.20	41.00
1/28/25	TMM	Emails re acceptance of service for Chard group; review and revise acceptance of service	.30	135.00
1/29/25	JAB	Correspond with Tom Melton; Conference with Jeff Shaw	.50	210.00
1/29/25	MSM	Analyze caselaw re statutory exceptions to Arizona homestead statutory exemption from collections, re whether an equitable lien can constitute a consensual lien, per same statute	1.40	392.00
1/29/25	TMM	Emails re documents related to claim and investment; emails with opposing counsel re checks and other evidence	.30	135.00
1/30/25	JAB	Review correspondence; Correspond with Jonathan Hafen	.50	210.00
1/30/25	MSM	Analyze additional caselaw re availability of Arizona homestead exemption to purchaser of real property with proceeds of a ponzi scheme	1.00	280.00
1/30/25	TMM	Emails re N and T Gray checks; email re liability	.30	135.00
1/31/25	JMC	Correspond with Max Milavetz re research on Arizona real estate exemption	.40	194.00
1/31/25	JAB	Review deposit into bank account; Correspond with M Barneck; Draft scheduling order	.80	336.00
1/31/25	MSM	Write analysis re applicability of exception to Arizona homestead exemption	.40	112.00

PARR BROWN GEE & LOVELESS

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Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
1/31/25	TMM	Email re Cameron Sargeant claim; Email re Thomas Gray claim	.20	90.00
2/03/25	JAB	Correspond with Jeff Shaw; Conference with Tom Melton	.40	168.00
2/03/25	CMM	Review expert report and research underlying materials; Draft expert disclosure document; Communicate re the same with Parr team; Review court order in claw back action; Communicate with Ault party re settlement and extension of time because of family circumstances	5.30	1,775.50
2/03/25	CY	Update spreadsheet with answers to complaint and new deadlines for Fields and Sargent groups	.40	82.00
2/03/25	TMM	Telephone conference with Thomas Gray's counsel; Review motion to extend time for answer; Meeting with Jeff Balls re Settlement	.50	225.00
2/04/25	JAB	Conference with Claire McGuire	.40	168.00
2/04/25	CMM	Attorney conference with Jeffery Balls re requested extension of deadline for settlement; Communicate with defendant re the same; Review Court minute entry related to bankruptcy case; Communicate with Parr Brown team re the same	1.50	502.50
2/04/25	CY	Review court docket to see any updates on filing answers; Email correspondence with Thomas Melton re same	.20	41.00
2/04/25	LH	Open mail from claimant and review letter enclosed re distribution and gratitude re same; Deliver same to Jeff Balls	.20	47.00
2/05/25	JAB	Telephone conference with Shaun Peck; Review settlement payments	.40	168.00
2/05/25	TMM	Draft email re Gray, Barker, Defa, and Williams settlement; Analysis of claim	1.20	540.00
2/07/25	JMC	Review and analyze research memo on Arizona homestead exemptions and consensual liens; Correspond with Jeff Balls re the Howell settlement	1.00	485.00
2/07/25	CMM	Communicate with Jeffery Balls re expert reports and summary judgement for Oberhansly and Guyon; Review order re status of claw back action; Research and draft report for Court; Research expert report for claw back action	6.10	2,043.50
2/10/25	JMC	Review and analyze settlement with Howell; Correspond with John Samuelson, Jeff Balls and Claire McGuire re Arizona law issues and strategy	1.10	533.50
2/10/25	JAB	Review research re homestead exemption; Review correspondence; Conference with Joseph Covey and Claire McGuire	2.10	882.00
2/10/25	CMM	Communicate with Josph Covey re Howell proposal for settlement; Review memo related to homestead exemption; Attorney conference with Jeffery Balls and Joseph Covey re the homestead exemption and Howell settlement; Research homestead exemption in Arizona; Communicate with Joseph Covey re bankruptcy issue and need for response on settlement	5.70	1,909.50
2/11/25	JMC	Correspond with Jeremy Sink re D Nelson settlement; Review stipulation to dismiss; Review and revise status report; Correspond with Jon Hafen, Jeff Balls and Claire McGuire re Nelson clawback action	2.40	1,164.00

PARR BROWN GEE & LOVELESS

Invoice: 962139
Rust Rare Coin Receivership
Asset Analysis & Recovery

May 28, 2025
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Date	Tkpr	Description	Hours	Amount
2/11/25	JAB	Review status report; Conference with Joseph Covey; Review correspondence from Matthew Barneck	.30	126.00
2/11/25	CMM	Review Court order re Nelson matter; Communicate with Joseph Covey and Jeffery Balls re the same; Draft status report; Communicate with Parr team re the same; Revise and prepare status report for filing; Review expert analysis; Communicate with expert re the same; Review settlement question from potential claw back defendant; Research the same	5.90	1,976.50
2/11/25	CY	Draft notice of dismissal for T Grey; Email correspondence with Thomas Melton re same	.20	41.00
2/12/25	JAB	Correspond with defendants	.50	210.00
2/12/25	CMM	Communicate with Parr team re issues with Nelson claw back action and bankruptcy filings; Review and revise expert report; Communicate with expert re filing of the same; Review new filing in Nelson case	4.80	1,608.00
2/12/25	JWN	No Charge - Review Silver Shoes' motion to reconsider and to dismiss for insufficient service of process; Review AG Tsunami et al.'s reply; Begin drafting opposition memorandum to Silver Shoes' motion to reconsider and to dismiss for insufficient service of process	.70	N/C
2/12/25	CY	Email correspondence with staff re filing notice of dismissal	.50	102.50
2/13/25	JWN	No Charge - Analyze possible counterarguments to the arguments raised by Silver Shoes in the motion; Draft opposition memorandum to Silver Shoes' motion to reconsider and to dismiss for insufficient service of process; Review relevant cases re insufficient service of process; Review service affidavits relating to Silver Shoes; Review Silver Shoes' registered agent information; Continue to review relevant case documents	5.30	N/C
2/13/25	CY	Draft settlement agreement for R Gray, N DeFa and N Williams; Draft notice of dismissal for R Gray, N DeFa and N Williams; Multiple email correspondence with Thomas Melton re same	1.10	225.50
2/14/25	JMC	Correspond with Jeff Balls re clawback settlement	.10	48.50
2/14/25	CMM	Review and revise expert report; Communicate with expert, Thomas Melton, and Jeffery Balls re the same; Finalize exhibits; Research expert disclosure rules and review case history; Serve expert report on opposing counsel	5.90	1,976.50
2/14/25	JWN	No Charge - Continue to draft opposition memorandum to Silver Shoes' motion to reconsider and to dismiss for insufficient service of process; Continue to review relevant cases re insufficient service of process; Attorney conference with Thomas Melton re opposition memorandum	2.00	N/C
2/14/25	CY	Research Z Finley status of service; Email correspondence with Thomas Melton re same	.20	41.00
2/16/25	JWN	No Charge - Revise opposition memorandum to Silver Shoes' motion to reconsider and to dismiss for insufficient service of process; Continue to review relevant cases re insufficient service of process; Continue to evaluate possible arguments	2.80	N/C

PARR BROWN GEE & LOVELESS

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Asset Analysis & Recovery

May 28, 2025
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Matter: 2

Date	Tkpr	Description	Hours	Amount
2/17/25	CMM	Review and revise expert report in claw back action; Communicate with expert re the same; Finalize and serve expert report; Communicate with Parr team re the same; Research summary judgement issues; Draft fact section for the same; Communicate with Guyon re access to exhibits and related issues; Communicate re settlement redline with claw back defendant	6.80	2,278.00
2/17/25	JWN	No Charge - Continue to revise opposition memorandum to Silver Shoes' motion to reconsider and to dismiss for insufficient service of process; Continue to review relevant authority re permissive extensions under Rule 4(m); Review opposition memorandum for accuracy; Prepare exhibits; Email correspondence with Thomas Melton and Jeffery Balls re opposition memorandum	3.10	N/C
2/18/25	JMC	Correspond with Jeff Balls and Arizona counsel re settlement and bankruptcy issues	.40	194.00
2/19/25	JAB	Conference with Ash McMurray re music streaming	.10	42.00
2/19/25	CMM	Research Howell homestead exemption issue; Review documents and expert report for Guyon summary judgment motion; Draft summary judgment motion; Communicate with Parr team re the same; Listen to claimant voicemail and respond to the same; Communicate with Joseph Covey re discovery issue	6.90	2,311.50
2/20/25	CMM	Research attorney lien issue; Research issue of illusory contract and lack of documentation/adverse presumption for summary judgment motion; Draft summary judgment fact section	7.40	2,479.00
2/20/25	JWN	No Charge - Email correspondence with opposing counsel re an extension of time to reply to their motion to dismiss; Draft stipulated motion for extension of time; Draft proposed order re same; Email correspondence with Thomas Melton and Jeffery Balls re same	2.00	N/C
2/21/25	JMC	Correspond with Jeff Balls and Claire McGuire re extensive requests; Review requests	.30	145.50
2/21/25	JAB	Telephone conference with Jeff Shaw	.80	336.00
2/21/25	CMM	Research question re unknown pro se filing; Communicate with Parr team re the same; Draft response to motion	3.60	1,206.00
2/24/25	JAB	Review opposition to motion to dismiss; Correspond with Crista Yancey re proofs of service	.70	294.00
2/24/25	CY	Draft Jeffery Balls declaration for service of process for C Fillerup, E Fillerup, B Baker and Z Finley; Research USPS tracking information re same; Email correspondence with Jeffery Balls re same	1.20	246.00
2/25/25	JAB	Review signed settlement agreement; Revise proofs of service; Telephone conference with Jeff Shaw; Correspond with defendant re settlement agreement	1.80	756.00
2/25/25	CMM	Review documents and expert analysis for summary judgement motion; Communicate re the same with Thomas Melton; Research attorney lien issue	5.70	1,909.50
2/25/25	CY	Phone conference with Jeffery Balls re declarations and delivery dates	.10	20.50

PARR BROWN GEE & LOVELESS

Invoice: 962139
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Date	Tkpr	Description	Hours	Amount
2/26/25	JAB	Review proofs of service; Telephone conference with defendant; Revise settlement agreement; Email defendant re same	.60	252.00
2/26/25	CMM	Review new filings related to main case; Research and draft portions of summary judgment motion; Review communications with opposing counsel and new 10th circuit ruling for potential impact	5.50	1,842.50
2/28/25	CMM	Review expert report for drafting of summary judgement motion; Research precious metals issues for the same	2.70	904.50
2/28/25	TMM	Review settlement agreements with N Defa, R Gray, and N Williams; telephone conference with Jeff Balls and D Mortensen re Tuesday hearing	.50	225.00
3/02/25	JAB	Correspond with defendants re settlement agreement	.30	126.00
3/04/25	JMC	Correspond with Jeff Balls re response to court; Correspond with Jon Hafen re clawback settlement	.20	97.00
3/04/25	CMM	Review communications with Joseph Covey and Jeffery Balls re to settlement of Howell matter	.20	67.00
3/05/25	JMC	Correspond with Jeff Balls and Jon Hafen re Howell settlement	.10	48.50
3/05/25	RMB	Prepare for meeting with Jon Hafen and Jeff Shaw; Meet with Jon Hafen, Jeff Balls and Jeff Shaw regarding Lugli investor group claw-back claims; Communicate with Erik Olson, legal counsel for Luglis, re meeting with the Receiver Jon Hafen	2.10	976.50
3/05/25	JAB	Correspond with defendant re settlement; Conference with Jeff Shaw and Rodger Burge	2.30	966.00
3/06/25	JMC	Review dismissal of McGrath matter; Correspond with Jon Hafen, Jeff Balls and others re Howell matter	1.20	582.00
3/06/25	MJB	(Hafen v. Howell) Conference with Jeff Balls (0.1); Correspond with L Draxlir (0.1)	.20	91.00
3/06/25	CMM	Communicate with Joseph Covey, Jeffery Balls and Receiver re Howell settlement offer; Review memo re homestead exemption	.60	201.00
3/06/25	CMM	Prepare for and attend meeting with Receiver, Joseph Covey and Jeffery Balls re settlement offer from Howell's and potential of collecting judgment; Review judgment and ruling from tenth circuit in same case; Draft potential settlement offer	1.90	636.50
3/07/25	JMC	Review and analyze motion to reinstate case in McGrath bankruptcy adversary proceeding; Correspond with Jon Hafen re the same	.20	97.00
3/07/25	RMB	Review Lugli claim file analyses and documents and communicate with Erik Olson re settlement meeting	1.30	604.50
3/07/25	MJB	(Hafen v. Howell) Correspond with Lewis Draxlir (0.1)	.10	45.50
3/07/25	JAB	Review deposits; Conference with Claire McGuire; Review settlement offer; Email Jonathan Hafen re same	.30	126.00
3/07/25	CMM	Research for argument in summary judgement motion; Attorney conference with Jeffery Balls re the same; Review information related to property appraisal for Kingman AZ property; Review objection filed by McGrath parties and reinstatement of Adversary Proceeding; Communicate with Jeffery Balls re Ault Settlement	4.10	1,373.50

PARR BROWN GEE & LOVELESS

Invoice: 962139
Rust Rare Coin Receivership
Asset Analysis & Recovery

May 28, 2025
Client: 176430
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Date	Tkpr	Description	Hours	Amount
3/10/25	RMB	Review Lugli summary information from Jeff Shaw; Prepare for meeting with Jon Hafen and Jeff Shaw and review Lugli claim documents	1.20	558.00
3/10/25	JAB	Correspond with Ryan Pahnke	.50	210.00
3/10/25	CMM	Research and draft fact section of summary judgement motion	2.90	971.50
3/11/25	RMB	Meet with Jon Hafen, Jeff Balls and Jeff Shaw regarding settlement meeting with Lugli investor group counsel; Review correspondence from Jeff Shaw re Lugli group transactions	1.20	558.00
3/11/25	MJB	(Hafen v. Howell) Correspond with Elise Harron (0.1)	.10	45.50
3/11/25	JAB	Telephone conference with M Boley; Draft status report; Conference with Jeff Shaw, Roger Burge, and Jonathan Hafen; Correspond with Erik Olson; Conference with Claire McGuire	2.00	840.00
3/11/25	CMM	Research and draft summary judgement motion	4.90	1,641.50
3/12/25	RMB	Prepare for and attend settlement conference with Lugli family group counsel, Jon Hafen, Jeff Shaw and Jeff Balls	1.60	744.00
3/12/25	JAB	Conference with Erik Olson, R Lugli, Jeff Shaw, Jonathan Hafen, Rodger Burge; Draft notice of dismissal; Email Ryan Pahnke re same	1.70	714.00
3/12/25	CMM	Review dismissal and order; Research settlement compliance issue	1.60	536.00
3/12/25	JWN	No Charge - Review reply filed by Silver Shoes; Email correspondence with Jeffery Balls re same	.30	N/C
3/13/25	RMB	Review Lugli group analysis and beneficial ownership materials from Jeff Shaw and review beneficial ownership materials provided by Lugli counsel	.60	279.00
3/13/25	JAB	Telephone conference with defendant; Review summary judgment motion	1.30	546.00
3/13/25	CMM	Research and draft summary judgement motion; Communicate with Jeffery Balls re the same; Communicate with expert re potential edits and clarifications	5.30	1,775.50
3/14/25	JAB	Revise motion for summary judgment; Conference with Claire McGuire; Telephone conference with Jeff Shaw	2.00	840.00
3/14/25	CMM	Draft and revise summary judgement motion; Communicate with Jeffery Balls and Jeff Shaw re the same; Prepare exhibits for and file the same; Attorney conference with Jeffery Balls re the motion strategy	4.70	1,574.50
3/17/25	RMB	Review of additional documentation from Lugli counsel re investments and entity ownership (1.2)	1.20	558.00
3/18/25	JAB	Call defendant re settlement check; Review messages folders	.70	294.00
3/18/25	CMM	Review and analyze objection filed in Nelson bankruptcy; Research issues impacting litigation	2.60	871.00
3/19/25	MJB	(Hafen v. Howell) Telephone conference with E Harron (0.1)	.10	45.50
3/19/25	JAB	Correspond with James Samuelson re appraisal; Draft motion for default judgment	1.30	546.00
3/20/25	JAB	Attend court hearing; Review deposits; Telephone conference with Ryan Pahnke; Correspond with Jeff Shaw	2.70	1,134.00
3/21/25	JMC	Correspond with Jim Samuelson re Howell settlement	.20	97.00

PARR BROWN GEE & LOVELESS

Invoice: 962139
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Asset Analysis & Recovery

May 28, 2025
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Date	Tkpr	Description	Hours	Amount
3/21/25	JAB	Correspond with Jeff Shaw; Correspond with Jonathan Hafen re settlement	1.30	546.00
3/21/25	CMM	Research issues for summary judgement motion in Guyon	5.20	1,742.00
3/24/25	MJB	(Hafen v. Howell) Telephone conference with E Harron (0.1)	.10	45.50
3/24/25	CMM	Review case law and motions re strict payor and payee scheme per inquiry from Joseph Covey	2.30	770.50
3/25/25	JAB	Review litigation status	.30	126.00
3/26/25	JMC	Correspond with Jeff Balls re Fidelity case; Review correspondence re the same	.30	145.50
3/26/25	MJB	(Hafen v. Howell) Correspond with Elise Harron (0.1)	.10	45.50
3/26/25	JAB	Review correspondence from B Booth; Research default judgment against Transnation	.70	294.00
3/27/25	CMM	Research attorney lien issue; Research retainer issue and destruction of file issue for summary judgement	6.90	2,311.50
3/28/25	JMC	Correspond with Jeff Balls re clawback action and setting aside judgment; Correspond with Jon Hafen re the same	.70	339.50
3/28/25	MJB	(Hafen v. Howell) Correspond with Jeff Balls (0.1)	.10	45.50
3/28/25	JAB	Telephone conference with B Booth; Review documents from B Booth; Conference with Joseph Covey	2.30	966.00
3/28/25	CMM	Research homestead exemption issue and settlement notes; Communicate with Jeffery Balls re the same; Research issue of contingency fee agreement for summary judgment motion	6.60	2,211.00
3/31/25	JAB	Correspond with John Hafen re settlements; Call B Booth re default judgment; Correspond with K Baughman; Telephone conference with K Baughman; Prepare for oral argument	.60	252.00

TOTAL PROFESSIONAL SERVICES**\$ 94,375.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Joseph M R Covey	485.00	16.00	7,760.00
Rodger M Burge	465.00	9.20	4,278.00
Michael T Hoppe	460.00	.70	322.00
Matthew J Ball	455.00	.80	364.00
Jeffery A Balls	420.00	42.90	18,018.00
Claire M McGuire	335.00	165.30	55,375.50
Maxwell S Milavetz	280.00	5.10	1,428.00
Thomas M Melton	450.00	6.30	2,835.00
Lori Henry - Paralegal	235.00	4.00	940.00
Crista Yancey - Paralegal	205.00	14.90	3,054.50
TOTALS		265.20	\$ 94,375.00

PARR BROWN GEE & LOVELESS

Invoice: 962139
Rust Rare Coin Receivership
Asset Analysis & Recovery

May 28, 2025
Client: 176430
Matter: 2

COSTS ADVANCED

Date	Description	Amount
12/02/24	ICU Investigations - Attempt to serve Zachary Finley complaint and summons	351.00
1/01/25	ICU Investigations - rush service of process on Natalie Williams and Noreen Defa	315.50
1/01/25	ICU Investigations - rush service of process on Thomas Chard	227.25
1/01/25	ICU Investigations - Summons and complaint served on Kapil Karkra	227.25
1/01/25	ICU Investigations - Summons and complaint served on Cameron Sargent	227.25
1/01/25	ICU Investigations - Summons and complaint served on Thomas Gray	227.25
1/01/25	ICU Investigations - Summons and complaint attempt to serve on Chard Family	392.00
1/01/25	ICU Investigations - Summons and complaint served on Silver Shoes	217.25
1/02/25	Pacer - electronic court records	1.20
1/02/25	SimpleCertified Mail	33.96
1/02/25	SimpleCertified Mail	8.22
1/03/25	SimpleCertified Mail	16.71
1/03/25	TD's Legal Process - rush service of process on Zachary Finley	53.00
1/06/25	SimpleCertified Mail	8.76
1/06/25	TD's Legal Process - rush service of process on Brigham Baker, Lehi Address	72.50
1/07/25	Constable Reitz - service of motion for substitution of Mary Wade due to death on Sara Leonard	84.00
1/09/25	SimpleCertified Mail	50.13
1/15/25	Pacer - electronic court records	3.90
1/31/25	Pacer - electronic court records	4.80
1/31/25	January 2025 Westlaw charges	255.77
2/28/25	Moyes Sellers & Hendricks - local counsel legal services through 2/28/25	630.00
3/21/25	PACER electronic court records	7.20
3/25/25	SimpleCertified Mail	16.88
3/31/25	PACER electronic court records	1.90
3/31/25	Moyes Sellers & Hendricks - Local counsel legal services through 3/31/2025	90.00

TOTAL COSTS ADVANCED \$ 3,523.68

TOTAL THIS INVOICE \$ 97,898.68

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

May 28, 2025

Rust Rare Coin Receivership

Invoice: 962139
Client: 176430
Matter: 2

REMITTANCE ADVICE**RE: Asset Analysis & Recovery**

BALANCE DUE THIS INVOICE**\$ 97,898.68**

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 # 962139****Online Payments:** <https://parrbrown.com/payment-portal>**Payments accepted by phone (801) 532-7840****Payable Upon Receipt**

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

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

Rust Rare Coin Receivership

May 28, 2025

Invoice: 962141
Client: 176430
Matter: 5

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Claims Administration

Professional Services	\$ 5,305.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 5,305.00

PARR BROWN GEE & LOVELESS

Invoice: 962141
Rust Rare Coin Receivership
Claims Administration

May 28, 2025
Client: 176430
Matter: 5

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/02/25	JAB	Review returned checks; Coordinate resending of same	.20	84.00
1/06/25	JAB	Telephone conference with claimant; Correspond with claimants	1.10	462.00
1/08/25	JAB	Correspond with claimants	.20	84.00
1/10/25	JAB	Telephone conference with claimants; Correspond with claimants	.60	252.00
1/13/25	JAB	Telephone conference with claimant; Coordinate issuance of checks	.70	294.00
1/14/25	JAB	Review returned checks	.10	42.00
1/22/25	JAB	Telephone conference with Leif Larsen and Jeff Shaw	.60	252.00
1/23/25	JAB	Correspond with claimants	.80	336.00
1/24/25	JAB	Correspond with claimants re checks; Correspond with claimants re claim amounts; Coordinate reissuance of checks; Correspond with Stretto	1.20	504.00
1/27/25	JMC	Correspond with John Hansen re E Johnson distributions and related issues	.20	97.00
1/27/25	JAB	Conference with Joseph Covey; Correspond with T Jones re distributions	.90	378.00
1/28/25	JAB	Telephone conference with claimants	.70	294.00
1/29/25	JAB	Telephone conference with claimants	.10	42.00
1/30/25	JAB	Telephone conference with claimant	.20	84.00
1/31/25	JAB	Telephone conference with claimant; Correspond with claimant	.50	210.00
2/03/25	JAB	Call claimants re check; Correspond with claimants re taxes	.60	252.00
2/05/25	JAB	Telephone conference with claimant	.70	294.00
2/10/25	JAB	Telephone conference with claimant; Correspond with claimant	.60	252.00
2/11/25	JAB	Telephone conference with claimant; Coordinate reissuance of check	.10	42.00
2/19/25	JAB	Call claimant re tax issue	.50	210.00
2/24/25	JAB	Correspond with claimants	.30	126.00
3/05/25	JAB	Review bank account status; Conference with claimant	.40	168.00
3/10/25	JAB	Telephone conference with claimant re 1099; Telephone conference with Jeff Shaw; Email claimant re 1099	.40	168.00
3/11/25	JAB	Correspond with claimant	.10	42.00
3/12/25	JAB	Correspond with claimant re tax documents	.10	42.00
3/13/25	JAB	Review correspondence from claimant; Email BRG re tax documents	.20	84.00
3/18/25	JAB	Correspond with claimants re checks; Review bank account	.50	210.00

TOTAL PROFESSIONAL SERVICES

\$ 5,305.00

PARR BROWN GEE & LOVELESS

Invoice: 962141
Rust Rare Coin Receivership
Claims Administration

May 28, 2025
Client: 176430
Matter: 5

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	485.00	.20	97.00
Jeffery A Balls	420.00	12.40	5,208.00
TOTALS		12.60	\$ 5,305.00

TOTAL THIS INVOICE

\$ 5,305.00

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

Rust Rare Coin Receivership

May 28, 2025

Invoice: 962141
Client: 176430
Matter: 5

REMITTANCE ADVICE

RE: Claims Administration

BALANCE DUE THIS INVOICE

\$ 5,305.00

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 # 962141

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-THIRD INTERIM FEE APPLICATION

Time Records of BRG

EXHIBIT C



INVOICE

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

May 06, 2025
Client-Project: 016222-025457
Invoice #: 10019078
Tax ID: 27-1451273

Via Email: jhafen@parrbrown.com

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

Services Rendered From January 1, 2025 Through March 31, 2025

Professional Services	\$ 133,341.00	USD
Voluntary Reduction	(1,760.00)	
Expenses Incurred	191.85	
CURRENT CHARGES	\$ 131,772.85	USD

PAYMENT IS DUE BY June 05, 2025

Please direct questions regarding this invoice to: Jeffrey Shaw at 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: 10019078

Please send remittance advice details to:
remitadvice@thinkbrg.com

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



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 # 10019078
Client-Project: 016222-025457

Services Rendered From January 1, 2025 Through March 31, 2025

PROFESSIONAL SERVICES

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Managing Director			
Ray Strong	435.00	6.10	2,653.50
Associate Director			
Leif Larsen	400.00	33.40	13,360.00
Jeffrey Shaw	400.00	287.40	114,960.00
Jeffrey Shaw	0.00	4.40	N/C
Associate			
Alexa Stubbs	190.00	1.40	266.00
Case Assistant			
Kellee Calder	155.00	1.60	248.00
Milo Kuhn	135.00	0.50	67.50
Ava McConkie	130.00	0.20	26.00
Total Professional Services		335.00	131,581.00

EXPENSES

Postage	99.09
Supplies	92.76
Total Expenses	191.85



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SUMMARY BY TASK CODE

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
300	Claims Process / Distribution	9.00	3,348.00
350	Net Winner / Claims Analysis	12.70	5,080.00
500	Recovery Litigation	264.30	105,891.50
600	Tax Compliance & Analysis	44.60	17,261.50
950	Fee Application Preparation & Hearing	4.40	0.00
Total Professional Services		335.00	131,581.00



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Services Rendered From January 1, 2025 Through March 31, 2025

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					
01/09/25	Jeffrey Shaw	Analyzed distribution check reports and status.	1.50	400.00	600.00
01/09/25	Jeffrey Shaw	Reviewed and updated summary distribution schedule.	3.50	400.00	1,400.00
01/10/25	Jeffrey Shaw	Analyzed distribution checks and updated summary schedule.	2.50	400.00	1,000.00
03/03/25	Alexa Stubbs	Reviewed documents and prepared schedule in connection with 1099 filings.	1.20	190.00	228.00
03/07/25	Jeffrey Shaw	Followed up regarding distribution check status.	0.30	400.00	120.00
Total for Task Code 300			9.00		3,348.00
Task Code: 350 - Net Winner / Claims Analysis					
02/18/25	Jeffrey Shaw	Reviewed and analyzed Sargent group activity and transactions and support.	4.80	400.00	1,920.00
02/19/25	Jeffrey Shaw	Analyzed Sargent group transactions and activity.	3.60	400.00	1,440.00
02/21/25	Jeffrey Shaw	Analyzed Sargent transactions and support and prepared response per counsel request.	2.10	400.00	840.00
03/20/25	Jeffrey Shaw	Prepared updated net winner analysis for Wade group.	0.70	400.00	280.00
03/20/25	Jeffrey Shaw	Reviewed Wade group activity and responded to counsel request.	1.50	400.00	600.00
Total for Task Code 350			12.70		5,080.00
Task Code: 500 - Recovery Litigation					
01/03/25	Jeffrey Shaw	Reviewed and updated declaration narrative.	2.50	400.00	1,000.00
01/06/25	Jeffrey Shaw	Reviewed updated and prepared declaration exhibits.	2.70	400.00	1,080.00
01/06/25	Jeffrey Shaw	Reviewed, updated and prepared declaration narrative.	1.80	400.00	720.00
01/07/25	Jeffrey Shaw	Reviewed, updated and prepared declaration narrative.	2.00	400.00	800.00
01/07/25	Jeffrey Shaw	Reviewed, updated and prepared declaration exhibits.	5.50	400.00	2,200.00
01/08/25	Jeffrey Shaw	Reviewed, updated and prepared declaration narrative.	4.90	400.00	1,960.00
01/09/25	Jeffrey Shaw	Analyzed Lugli document production and transaction detail.	2.50	400.00	1,000.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 500 - Recovery Litigation					
01/10/25	Jeffrey Shaw	Reviewed and updated declaration narrative.	1.80	400.00	720.00
01/10/25	Jeffrey Shaw	Reviewed and updated declaration exhibits.	2.10	400.00	840.00
01/13/25	Jeffrey Shaw	Coordinated meeting regarding Oberhansly litigation.	0.20	400.00	80.00
01/13/25	Jeffrey Shaw	Reviewed and updated declaration exhibits.	3.10	400.00	1,240.00
01/13/25	Jeffrey Shaw	Met with BRG to review declaration narrative.	1.80	400.00	720.00
01/13/25	Jeffrey Shaw	Reviewed, revised and updated declaration narrative.	1.80	400.00	720.00
01/13/25	Ray Strong	Reviewed Mark Oberhansly declaration in preparation for filing.	1.00	435.00	435.00
01/13/25	Ray Strong	Met with BRG regarding finalization of Mark Oberhansly declaration.	1.80	435.00	783.00
01/14/25	Jeffrey Shaw	Reviewed and updated declaration narrative.	1.30	400.00	520.00
01/14/25	Jeffrey Shaw	Reviewed and updated declaration exhibits.	6.50	400.00	2,600.00
01/15/25	Jeffrey Shaw	Reviewed and updated declaration narrative.	3.70	400.00	1,480.00
01/15/25	Jeffrey Shaw	Reviewed and updated declaration exhibits.	3.80	400.00	1,520.00
01/15/25	Jeffrey Shaw	Call and emails with counsel regarding Oberhansly declaration.	0.50	400.00	200.00
01/16/25	Jeffrey Shaw	Reviewed and finalized declaration narrative.	3.50	400.00	1,400.00
01/16/25	Jeffrey Shaw	Reviewed and finalized declaration exhibits.	4.00	400.00	1,600.00
01/17/25	Jeffrey Shaw	Reviewed and prepared declaration exhibits for submission to counsel.	2.50	400.00	1,000.00
01/17/25	Jeffrey Shaw	Follow-up regarding Guyon group litigation.	0.30	400.00	120.00
01/17/25	Jeffrey Shaw	Analyzed Guyon group investment activity.	1.90	400.00	760.00
01/17/25	Alexa Stubbs	Prepared consolidated file of Oberhansly declaration exhibits.	0.20	190.00	38.00
01/21/25	Jeffrey Shaw	Spoke with counsel regarding litigation issues.	0.40	400.00	160.00
01/21/25	Jeffrey Shaw	Reviewed and analyzed Guyon group investment activity and support.	4.20	400.00	1,680.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 500 - Recovery Litigation					
01/21/25	Jeffrey Shaw	Follow-up regarding Guyon litigation.	0.30	400.00	120.00
01/22/25	Jeffrey Shaw	Reviewed and analyzed Guyon group investment activity and support.	2.10	400.00	840.00
01/22/25	Jeffrey Shaw	Reviewed and prepared Guyon declaration narrative.	1.50	400.00	600.00
01/22/25	Jeffrey Shaw	Prepared Guyon declaration exhibits.	2.20	400.00	880.00
01/22/25	Jeffrey Shaw	Reviewed Guyon filed proof of claim.	1.30	400.00	520.00
01/23/25	Jeffrey Shaw	Analyzed Guyon transaction data and support.	4.30	400.00	1,720.00
01/24/25	Jeffrey Shaw	Analyzed Guyon account activity, transactions, emails, support.	6.50	400.00	2,600.00
01/24/25	Jeffrey Shaw	Prepared declaration schedules.	1.50	400.00	600.00
01/27/25	Jeffrey Shaw	Analyzed Guyon account activity, transactions, emails, support.	4.10	400.00	1,640.00
01/27/25	Jeffrey Shaw	Prepared declaration schedules.	2.80	400.00	1,120.00
01/27/25	Jeffrey Shaw	Follow-up with counsel regarding litigation issues.	0.30	400.00	120.00
01/28/25	Jeffrey Shaw	Reviewed electronic communication between Guyon and Rust Rare Coin.	2.30	400.00	920.00
01/29/25	Jeffrey Shaw	Reviewed electronic communication between Guyon and Rust Rare Coin.	4.50	400.00	1,800.00
01/29/25	Jeffrey Shaw	Emails regarding Fields group transactions.	0.30	400.00	120.00
01/29/25	Jeffrey Shaw	Call and emails to counsel regarding litigation issues.	0.40	400.00	160.00
01/30/25	Jeffrey Shaw	Reviewed Fields group transactions and prepared support per counsel request.	1.20	400.00	480.00
01/31/25	Jeffrey Shaw	Reviewed and revised Guyon schedules.	1.60	400.00	640.00
01/31/25	Jeffrey Shaw	Analyzed Guyon activity and support.	2.90	400.00	1,160.00
01/31/25	Jeffrey Shaw	Prepared declaration narrative.	1.70	400.00	680.00
02/03/25	Jeffrey Shaw	Emails with counsel regarding litigation issues.	0.30	400.00	120.00
02/03/25	Jeffrey Shaw	Reviewed and responded to emails regarding litigation issues.	0.40	400.00	160.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 500 - Recovery Litigation					
02/03/25	Jeffrey Shaw	Prepared declaration narrative.	4.80	400.00	1,920.00
02/04/25	Jeffrey Shaw	Reviewed transaction data and support and prepared declaration narrative.	3.20	400.00	1,280.00
02/04/25	Jeffrey Shaw	Analyzed Guyon transactions and support.	2.00	400.00	800.00
02/05/25	Jeffrey Shaw	Analyzed Guyon transactions and support.	2.50	400.00	1,000.00
02/05/25	Jeffrey Shaw	Prepared declaration narrative.	2.50	400.00	1,000.00
02/06/25	Jeffrey Shaw	Analyzed Guyon transactions and support.	2.30	400.00	920.00
02/06/25	Jeffrey Shaw	Prepared declaration narrative.	2.80	400.00	1,120.00
02/06/25	Jeffrey Shaw	Reviewed Guyon counterclaim.	1.40	400.00	560.00
02/06/25	Jeffrey Shaw	Reviewed and updated declaration schedules.	1.30	400.00	520.00
02/07/25	Jeffrey Shaw	Reviewed Guyon counterclaim and transactions.	2.70	400.00	1,080.00
02/07/25	Jeffrey Shaw	Reviewed and updated declaration narrative.	0.80	400.00	320.00
02/10/25	Jeffrey Shaw	Prepared declaration narrative.	3.50	400.00	1,400.00
02/10/25	Jeffrey Shaw	Prepared declaration exhibits.	4.50	400.00	1,800.00
02/11/25	Jeffrey Shaw	Prepared declaration narrative.	0.70	400.00	280.00
02/11/25	Jeffrey Shaw	Prepared declaration exhibits.	5.40	400.00	2,160.00
02/12/25	Jeffrey Shaw	Prepared declaration exhibits.	3.90	400.00	1,560.00
02/12/25	Ray Strong	Analyzed draft Guyon declaration for litigation.	0.80	435.00	348.00
02/13/25	Jeffrey Shaw	Met with BRG regarding declaration narrative.	0.80	400.00	320.00
02/13/25	Jeffrey Shaw	Prepared declaration exhibits.	5.90	400.00	2,360.00
02/13/25	Jeffrey Shaw	Updated declaration narrative.	0.80	400.00	320.00
02/13/25	Ray Strong	Analyzed Oberhansly declaration and related exhibits for finalization.	0.70	435.00	304.50
02/13/25	Ray Strong	Met with BRG regarding finalization of Guyon declaration for litigation.	0.80	435.00	348.00
02/14/25	Jeffrey Shaw	Reviewed and updated declaration narrative.	1.50	400.00	600.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 500 - Recovery Litigation					
02/14/25	Jeffrey Shaw	Prepared declaration exhibits.	4.80	400.00	1,920.00
02/14/25	Jeffrey Shaw	Reviewed and updated declaration exhibits.	1.50	400.00	600.00
02/14/25	Jeffrey Shaw	Reviewed, finalized and submitted declaration and exhibits.	1.00	400.00	400.00
02/17/25	Jeffrey Shaw	Reviewed and updated Oberhansly declaration narrative.	2.50	400.00	1,000.00
02/17/25	Jeffrey Shaw	Reviewed and updated Oberhansly declaration exhibits.	3.50	400.00	1,400.00
02/17/25	Jeffrey Shaw	Reviewed, finalized and submitted declaration and exhibits.	1.20	400.00	480.00
02/18/25	Ray Strong	Reviewed litigation status.	0.20	435.00	87.00
02/20/25	Jeffrey Shaw	Analyzed Tilley transactions / emails.	1.20	400.00	480.00
02/21/25	Jeffrey Shaw	Call with counsel regarding litigation issues.	0.70	400.00	280.00
02/21/25	Jeffrey Shaw	Analyzed Tilley transactions and support.	3.30	400.00	1,320.00
02/24/25	Jeffrey Shaw	Followed-up with counsel regarding litigation and case issues.	0.30	400.00	120.00
02/24/25	Jeffrey Shaw	Followed-up with counsel regarding litigation and other case issues.	0.30	400.00	120.00
02/24/25	Jeffrey Shaw	Analyzed Tilley activity and support.	1.80	400.00	720.00
02/25/25	Jeffrey Shaw	Call with counsel regarding litigation issues.	0.30	400.00	120.00
02/25/25	Jeffrey Shaw	Analyzed Tilley transactions and support.	3.40	400.00	1,360.00
02/25/25	Jeffrey Shaw	Emails regarding litigation issues.	0.30	400.00	120.00
02/26/25	Jeffrey Shaw	Reviewed Tilley activity and support and responded to counsel inquiry.	2.10	400.00	840.00
02/27/25	Jeffrey Shaw	Analyzed Tilley transactions and prepared email regarding the same.	4.10	400.00	1,640.00
03/03/25	Jeffrey Shaw	Emails regarding Lugli group.	0.30	400.00	120.00
03/04/25	Jeffrey Shaw	Analyzed Lugli activity and support.	5.90	400.00	2,360.00
03/05/25	Jeffrey Shaw	Analyzed Lugli activity and support.	4.20	400.00	1,680.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 500 - Recovery Litigation					
03/05/25	Jeffrey Shaw	Prepared for and met with Receiver and counsel regarding Lugli group.	1.80	400.00	720.00
03/05/25	Ray Strong	Evaluated status of remaining litigation matters.	0.20	435.00	87.00
03/05/25	Ray Strong	Analyzed expert reports prepared for updates based on remaining litigation matters.	0.60	435.00	261.00
03/07/25	Jeffrey Shaw	Analyzed Lugli transactions and support.	6.10	400.00	2,440.00
03/07/25	Jeffrey Shaw	Followed-up with counsel regarding litigation issues.	0.30	400.00	120.00
03/10/25	Jeffrey Shaw	Analyzed Lugli activity and prepared schedules.	5.30	400.00	2,120.00
03/10/25	Jeffrey Shaw	Reviewed and suggested revisions of Lugli email.	0.60	400.00	240.00
03/10/25	Jeffrey Shaw	Emails in connection with Lugli group.	0.30	400.00	120.00
03/11/25	Jeffrey Shaw	Prepared for and attended meeting with Receiver and counsel regarding Lugli litigation.	1.40	400.00	560.00
03/11/25	Jeffrey Shaw	Attended meeting with Receiver and counsel regarding Lugli litigation.	0.80	400.00	320.00
03/11/25	Jeffrey Shaw	Reviewed and prepared Lugli schedules.	4.30	400.00	1,720.00
03/12/25	Jeffrey Shaw	Prepared for meeting with Lugli counsel.	2.00	400.00	800.00
03/12/25	Jeffrey Shaw	Reviewed and prepared Lugli schedules.	3.10	400.00	1,240.00
03/12/25	Jeffrey Shaw	Met with Receiver, Receiver counsel, Rusty Lugli and Lugli group counsel.	0.90	400.00	360.00
03/13/25	Jeffrey Shaw	Reviewed Lugli transactions and support and prepared schedules.	3.70	400.00	1,480.00
03/13/25	Jeffrey Shaw	Reviewed Lugli proof of claim.	0.80	400.00	320.00
03/14/25	Jeffrey Shaw	Reviewed Oberhansly Summary Judgment motion and submitted suggested revisions.	1.40	400.00	560.00
03/14/25	Jeffrey Shaw	Reviewed Oberhansly activity and schedules.	0.90	400.00	360.00
03/14/25	Jeffrey Shaw	Discussion and email with counsel regarding Oberhansly Summary Judgment motion.	0.30	400.00	120.00
03/14/25	Jeffrey Shaw	Reviewed Oberhansly schedules.	0.60	400.00	240.00
03/14/25	Jeffrey Shaw	Reviewed Lugli claim and documents.	2.00	400.00	800.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 500 - Recovery Litigation					
03/19/25	Jeffrey Shaw	Reviewed Lugli activity and support and prepared and updated schedule.	3.70	400.00	1,480.00
03/19/25	Jeffrey Shaw	Reviewed Lugli claim and response to Receiver determination.	1.90	400.00	760.00
03/20/25	Jeffrey Shaw	Reviewed Lugli activity and support and prepared and updated schedules.	3.00	400.00	1,200.00
03/21/25	Jeffrey Shaw	Prepared and updated Lugli schedules.	3.10	400.00	1,240.00
03/21/25	Jeffrey Shaw	Analyzed Lugli activity and support.	2.60	400.00	1,040.00
03/21/25	Jeffrey Shaw	Emails regarding litigation issues.	0.20	400.00	80.00
03/24/25	Jeffrey Shaw	Reviewed, updated, finalized and submitted Lugli schedules.	3.10	400.00	1,240.00
Total for Task Code 500			264.30		105,891.50
Task Code: 600 - Tax Compliance & Analysis					
01/03/25	Leif Larsen	Analyzed correspondence received from the state of Tennessee and contacted the revenue office to resolve outstanding issues related to Writers Den.	0.60	400.00	240.00
01/03/25	Jeffrey Shaw	Reviewed and prepared emails regarding tax issues.	0.20	400.00	80.00
01/06/25	Leif Larsen	Followed up on information needed to prepare information returns for 2024.	0.20	400.00	80.00
01/07/25	Leif Larsen	Prepared the fourth quarter 2024 state payroll tax returns.	2.60	400.00	1,040.00
01/07/25	Leif Larsen	Prepared the fourth quarter 2024 federal payroll tax returns.	2.20	400.00	880.00
01/07/25	Leif Larsen	Updated employee information and transferred 2024 data to be used in preparation of 2024 W-2s.	2.40	400.00	960.00
01/08/25	Jeffrey Shaw	Followed-up regarding tax issues.	0.30	400.00	120.00
01/08/25	Jeffrey Shaw	Reviewed 2023-2024 transactions and prepared reports for 1099s.	0.70	400.00	280.00
01/09/25	Jeffrey Shaw	Follow-up with Receiver regarding tax issues.	0.20	400.00	80.00
01/10/25	Leif Larsen	Prepared the annual 2024 federal payroll tax returns.	2.90	400.00	1,160.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 600 - Tax Compliance & Analysis					
01/10/25	Leif Larsen	Reviewed and reconciled 2024 payroll reports and prepared corresponding schedules.	2.40	400.00	960.00
01/13/25	Leif Larsen	Prepared Form W-2s for 2024 and prepared for distribution to recipients.	3.20	400.00	1,280.00
01/13/25	Leif Larsen	Prepared annual Utah state W-2 submission report and submitted to the Utah State Tax Commission.	2.10	400.00	840.00
01/13/25	Leif Larsen	Prepared annual Utah state Form 941-E report and submitted to the Utah State Tax Commission.	1.20	400.00	480.00
01/14/25	Kellee Calder	Printed and distributed tax year 2024 Form 1099s to recipients.	0.10	155.00	15.50
01/14/25	Leif Larsen	Finalized and reviewed all 2024 quarterly and annual payroll returns.	1.90	400.00	760.00
01/17/25	Milo Kuhn	Picked up signed payroll tax returns from Receiver's office.	0.50	135.00	67.50
01/17/25	Leif Larsen	Performed final review of 2024 payroll tax returns.	0.50	400.00	200.00
01/17/25	Jeffrey Shaw	Coordinated tax filings.	0.30	400.00	120.00
01/21/25	Kellee Calder	Printed and sent in Forms 940 and 941 to taxing authorities for tax year 2024.	0.10	155.00	15.50
01/21/25	Leif Larsen	Analyzed 2024 transactions and researched 1099 filing requirements for class action settlement payments.	1.80	400.00	720.00
01/21/25	Leif Larsen	Analyzed 2024 transactions and prepared supporting work papers for information returns.	2.60	400.00	1,040.00
01/21/25	Jeffrey Shaw	Discussion with BRG regarding tax issues.	0.30	400.00	120.00
01/21/25	Jeffrey Shaw	Prepared email to Receiver regarding tax issues.	0.30	400.00	120.00
01/22/25	Leif Larsen	Prepared for and participated in conference call regarding Zions class action proceeds.	0.70	400.00	280.00
01/22/25	Leif Larsen	Followed up with the state of Tennessee regarding tax issues related to Writer's Den, LLC.	0.30	400.00	120.00
01/22/25	Leif Larsen	Prepared 2024 Forms 1099 and 1096 and requested additional information need to finalize the returns.	1.40	400.00	560.00
01/22/25	Jeffrey Shaw	Attended call with counsel to discuss tax issues.	0.50	400.00	200.00



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<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 600 - Tax Compliance & Analysis					
01/23/25	Jeffrey Shaw	Follow-up regarding 1099 issues.	0.20	400.00	80.00
01/27/25	Leif Larsen	Updated and finalized the 2024 Forms 1099-NEC, and 1096 returns.	0.60	400.00	240.00
01/29/25	Kellee Calder	Printed and distributed tax year 2024 Form 1099s.	0.10	155.00	15.50
01/31/25	Leif Larsen	Cleared diagnostics and submitted 2024 information returns to the IRS.	0.50	400.00	200.00
02/03/25	Leif Larsen	Updated 2024 W-2 to include state withholding account number.	1.20	400.00	480.00
02/03/25	Jeffrey Shaw	Discussion and email regarding tax issues.	0.50	400.00	200.00
02/04/25	Jeffrey Shaw	Discussion regarding tax issues.	0.20	400.00	80.00
02/05/25	Kellee Calder	Printed and distributed amended tax year 2024 Form 1099s to recipients.	1.00	155.00	155.00
02/12/25	Leif Larsen	Analyzed correspondence received from the state of Utah and prepared the annual filing report for the Department of Workforce services.	0.50	400.00	200.00
02/18/25	Ava McConkie	Performed quality review of 2024 1099 files.	0.20	130.00	26.00
02/25/25	Jeffrey Shaw	Reviewed claims and discussion regarding tax issues.	1.50	400.00	600.00
02/28/25	Leif Larsen	Reviewed vendor claimant distributions to identify recipients requiring 2024 information returns.	0.40	400.00	160.00
02/28/25	Jeffrey Shaw	Discussion with BRG regarding tax issues.	0.40	400.00	160.00
03/03/25	Jeffrey Shaw	Discussion with staff regarding analysis to be completed.	0.30	400.00	120.00
03/05/25	Jeffrey Shaw	Reviewed and discussed vendor distributions and 1099 requirements.	0.70	400.00	280.00
03/07/25	Jeffrey Shaw	Reviewed claims, updated vendor 1099 schedule, discussion with BRG regarding the same.	0.70	400.00	280.00
03/10/25	Jeffrey Shaw	Discussion with BRG and counsel regarding tax issues.	0.50	400.00	200.00
03/10/25	Jeffrey Shaw	Reviewed 1099s to verify correctness and completeness.	0.50	400.00	200.00
03/10/25	Jeffrey Shaw	Prepared and submitted 1099 per counsel request.	0.30	400.00	120.00



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Invoice # 10019078
Client-Project: 016222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 600 - Tax Compliance & Analysis					
03/11/25	Leif Larsen	Submitted corrected information returns to the proper taxing authorities.	0.80	400.00	320.00
03/12/25	Kellee Calder	Prepared 1099-NEC for mailing.	0.30	155.00	46.50
03/12/25	Leif Larsen	Updated vendor 1099 information returns.	0.40	400.00	160.00
03/12/25	Jeffrey Shaw	Emails and discussions regarding 1099 issues.	0.30	400.00	120.00
Total for Task Code 600			44.60		17,261.50
Task Code: 950 - Fee Application Preparation & Hearing					
01/28/25	Jeffrey Shaw	[NC] Reviewed and revised time entries and descriptions for Oct-Dec.	1.70	0.00	0.00
01/28/25	Jeffrey Shaw	[NC] Prepared fee application narrative.	1.90	0.00	0.00
01/28/25	Jeffrey Shaw	[NC] Reviewed, finalized and submitted Oct-Dec bill and narrative.	0.80	0.00	0.00
Total for Task Code 950			4.40		0.00
Professional Services			335.00		131,581.00



INVOICE

To: Jonathan O. Hafen

c/o: Parr Brown Gee & Loveless

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

Page 14 of 14

Invoice # 10019078

Client-Project: 016222-025457

DETAIL OF EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
Postage		
01/15/25	Postage - Payment of Expenses Postage on 2025-01-15. Line number 3. Expense Rept#0100-7161-9981Certified mailing W3/W2 - Kellee Calder 01/15/2025	11.26
01/31/25	Postage	76.79
03/31/25	Postage March 2025. Postage Chargeback: 16 Units for \$11.04 - 03/31/2025	11.04
	Total for Postage	99.09
Supplies		
01/06/25	Supplies - 01/06/2025	92.76
	Total for Supplies	92.76
Expenses		191.09

EXHIBIT D

EXHIBIT D

TWENTY-THIRD 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: Jeff Balls

February 10, 2025

Client: PA123

Matter: 00008

Invoice #: 1312517

Page: 1

RE: Gretchen Howell BK - Jonathan Hafen Creditor

For Professional Services Rendered Through January 31, 2025

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
01/02/2025	JSS	Review and draft request for status hearing and order; email to J. Balls re: comment.	1.30	\$400.00	\$520.00
01/03/2025	JSS	Email from attorney J. Covey re: draft request for hearing; update and revise request; emails with attorney J. Balls re: same; file request, lodge order and serve same; later receive court order, calendar same; instructions to legal assistant; email to Balls and Covey with hearing order.	1.70	\$400.00	\$680.00
01/05/2025	JSS	Email exchange with attorney J. Covey re: status hearing and related matters; begin review on possible scenarios.	0.60	\$400.00	\$240.00
01/07/2025	JSS	[NO CHARGE] Emails with attorney J. Kahn and court chambers re: appearances at status hearing on MTD.	0.30	\$0.00	\$0.00
01/08/2025	JSS	Emails with attorney J. Kahn re: zoom hearing, Utah counsel and related matters; separate email to Kahn re: mediation; emails to attorneys' J. Balls and J. Covey re: zoom.	0.80	\$400.00	\$320.00
01/09/2025	JSS	Call to and emails with attorney M. Galen re: Zions lawsuit filed by Howells, status, next steps; research re: community property when spouse dies.	1.00	\$400.00	\$400.00
01/10/2025	JSS	Work on preparation for upcoming hearing; prepare hearing notes, analysis.	2.50	\$400.00	\$1,000.00
01/13/2025	JSS	Review AZ community property law, statutes and related materials including Colliers in preparation for upcoming hearing.	2.30	\$400.00	\$920.00

February 10, 2025

Client: PA123

Matter: 00008

Invoice #: 1312517

SacksTierney P.A.

ATTORNEYS

Page: 2

SERVICES

Date		Description of Services	Hours	Rate	Amount
01/14/2025	JSS	Continued review of case law, Arizona community property statutes, and related materials, begin draft outline for hearing.	2.90	\$400.00	\$1,160.00
01/15/2025	JSS	Continue research and preparation for upcoming hearing; review cases re: community property claim remaining after death of spouse; work on outline.	3.50	\$400.00	\$1,400.00
01/16/2025	JSS	Continue work on hearing notebook and preparation.	2.00	\$400.00	\$800.00
01/21/2025	JSS	Prepare for hearing; review online records, case law and related documents; finish outline of expected questions and answers; receive copy of decision and order dismissing; emails and call with attorney J. Balls re: same; call with attorney M. Harris re: Marshal's sale; call with attorney J. Covey re: same.	3.70	\$400.00	\$1,480.00
01/22/2025	JSS	Review re: writ of execution, next steps, emails with attorney M. Donnelly re: same.	1.00	\$400.00	\$400.00
01/24/2025	JSS	Receive COS re: dismissal order; review re: next steps; email to attorney's J. Balls and J. Covey with analysis; call with Balls and separate call with Covey re: same.	1.70	\$400.00	\$680.00
01/27/2025	JSS	Multiple emails with J. Covey re: interlocutory judgment, enforcement rights.	0.80	\$400.00	\$320.00
Total Professional Services			26.10		\$10,320.00

SUMMARY

		Hours	Rate	Amount
JSS	James Scott Samuelson	25.80	\$400.00	\$10,320.00
JSS	James Scott Samuelson	0.30	\$0.00	\$0.00
Total Services			\$10,320.00	
Total Current Charges				\$10,320.00
Previous Balance				\$5,890.00
PAY THIS AMOUNT				\$16,210.00

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

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

Attention: Jeff Balls

March 05, 2025

Client: PA123

Matter: 00008

Invoice #: 1313100

Page: 1

RE: Gretchen Howell BK - Jonathan Hafen Creditor

For Professional Services Rendered Through February 28, 2025

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
02/03/2025	JSS	Review re: next steps; writ and related items.	0.40	\$425.00	\$170.00
02/05/2025	JSS	Review re: appeals deadline, BNC mailing to debtor; calendar same.	0.30	\$425.00	\$127.50
02/07/2025	JSS	Review and email to attorney J. Balls and J. Covey re: next steps; email from J. Covey re: same.	0.40	\$425.00	\$170.00
02/10/2025	JSS	Email from J. Balls re: upcoming conference call and related questions; review and provide preliminary response to Balls and J. Covey.	1.80	\$425.00	\$765.00
02/11/2025	JSS	Review re: settlement issues, next steps, email to attorney J. Covey re: same.	1.00	\$425.00	\$425.00
02/12/2025	JSS	Review re: questions; phone call with attorney's J. Covey and J. Balls.	1.30	\$425.00	\$552.50
02/25/2025	JSS	Review re: follow up.	0.20	\$425.00	\$85.00
Total Professional Services			5.40		\$2,295.00

SUMMARY

		Hours	Rate	Amount
JSS	James Scott Samuelson	5.40	\$425.00	\$2,295.00

SacksTierney P.A.
ATTORNEYS

March 05, 2025

Client: PA123

Matter: 00008

Invoice #: 1313100

Page: 2

Total Services	\$2,295.00
Total Current Charges	\$2,295.00
Previous Balance	\$16,210.00
PAY THIS AMOUNT	\$18,505.00

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

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

Attention: Jeff Balls

April 09, 2025

Client: PA123

Matter: 00008

Invoice #: 1314182

Page: 1

RE: Gretchen Howell BK - Jonathan Hafen Creditor

For Professional Services Rendered Through March 31, 2025

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
03/05/2025	JSS	Review notes re: appeal, settlement and related items.	0.30	\$425.00	\$127.50
03/13/2025	JSS	Receive and review Chapter 13 Trustee final report in Howell dismissed case.	0.40	\$425.00	\$170.00
03/18/2025	JSS	Email to J. Balls re: settlement, next steps.	0.40	\$425.00	\$170.00
03/19/2025	JSS	Email from and to attorney J. Balls re: appraiser and Utah action; review for possible appraiser.	0.40	\$425.00	\$170.00
03/21/2025	JSS	Extended call from attorney J. Kahn re: Utah litigation, Kingman property and settlement offer, email to attorneys' J. Ball and J. Covey re: same.	1.60	\$425.00	\$680.00
03/24/2025	JSS	Review and email to attorney J. Kahn re: relayed offer.	0.60	\$425.00	\$255.00
Total Professional Services			3.70		\$1,572.50

SUMMARY

		Hours	Rate	Amount
JSS	James Scott Samuelson	3.70	\$425.00	\$1,572.50

SacksTierney P.A.
ATTORNEYS

April 09, 2025

Client: PA123

Matter: 00008

Invoice #: 1314182

Page: 2

Total Services	\$1,572.50
Total Current Charges	\$1,572.50
Previous Balance	\$18,505.00
Less Payments	(\$5,890.00)
PAY THIS AMOUNT	\$14,187.50

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.

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Parr Brown Gee & Loveless
101 South 200 East Ste. 700
Salt Lake City, UT 84111
Attention: Matthew J. Ball

August 02, 2024
Client: PA123
Matter: 00007
Invoice #: 1307225

Page: 1

RE: Jonathan Hafen v. Leslie & Gretchen Howell

For Professional Services Rendered Through July 31, 2024

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
07/22/2024	SED	Call from JSS regarding Chapter 13 plan, judgment and lift stay.	0.30	\$240.00	\$72.00
07/30/2024	SED	Call from J. Samuelson regarding home equity and plan.	0.20	\$240.00	\$48.00
Total Professional Services			0.50		\$120.00

SUMMARY

		Hours	Rate	Amount
SED	Sandra E. Dousdebos	0.50	\$240.00	\$120.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
07/31/2024	Administrative Expense	\$6.00
Total Disbursements		\$6.00

SacksTierney P.A.
ATTORNEYS

August 02, 2024

Client: PA123

Matter: 00007

Invoice #: 1307225

Page: 2

Total Services	\$120.00	
Total Disbursements	\$6.00	
Total Current Charges		\$126.00
Previous Balance		\$7,218.27
Current Interest		\$37.89
PAY THIS AMOUNT		\$7,382.16

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

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

Attention: Matthew J. Ball

December 02, 2024
Client: PA123
Matter: 00007
Invoice #: 1310744

Page: 1

RE: Jonathan Hafen v. Leslie & Gretchen Howell

For Professional Services Rendered Through November 30, 2024

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
11/21/2024	JSS	Review and email to attorney J. Balls re: decision and related matters; later email to R. Becker re: conference with Debtor's attorney.	0.40	\$400.00	\$160.00
Total Professional Services			0.40		\$160.00

SUMMARY

		Hours	Rate	Amount
JSS	James Scott Samuelson	0.40	\$400.00	\$160.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
11/30/2024	Administrative Expense	\$8.00
Total Disbursements		\$8.00

SacksTierney P.A.
ATTORNEYS

December 02, 2024
Client: PA123
Matter: 00007
Invoice #: 1310744

Page: 2

Total Services	\$160.00	
Total Disbursements	\$8.00	
Total Current Charges		\$168.00
Previous Balance		\$7,382.16
Less Payments		(\$7,155.73)
Less Credits/Write Offs		(\$100.43)
PAY THIS AMOUNT		\$294.00

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

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

Attention: Matthew J. Ball

February 19, 2025
Client: PA123
Matter: 00007
Invoice #: 1312813

Page: 1

RE: Jonathan Hafen v. Leslie & Gretchen Howell

For Professional Services Rendered Through January 31, 2025

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
01/22/2025	MMD	Attention to and analysis of Federal law regarding timing for new writ of execution (.4); email correspondence with Attorneys Harris and Samuelson regarding same (.4).	0.80	\$300.00	\$240.00
Total Professional Services			0.80		\$240.00

SUMMARY

		Hours	Rate	Amount
MMD	Mea M. Donnelly	0.80	\$300.00	\$240.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
01/31/2025	Administrative Expense	\$12.00
Total Disbursements		\$12.00

Total Services	\$240.00
Total Disbursements	\$12.00
Total Current Charges	\$252.00
Previous Balance	\$294.00
PAY THIS AMOUNT	\$546.00

February 19, 2025

Client: PA123

Matter: 00007

Invoice #: 1312813

SacksTierneyP.A.
ATTORNEYS

Page: 2

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-THIRD INTERIM FEE APPLICATION Proposed Order

EXHIBIT E

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

Attorneys for Jonathan O. Hafen as Receiver

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

COMMODITY FUTURES TRADING
COMMISSION, and

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

Plaintiffs,

vs.

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

Defendants;

and

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

Relief Defendants.

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

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

Judge Tena Campbell

Magistrate Judge Dustin Pead

Before the Court is the twenty-sixth 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 January 1, 2025, through March 31, 2025 (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: \$19,364.00 for fees and expenses.
- b. Parr Brown: \$110,935.69 for fees and expenses.
- c. BRG: \$131,772.85 for fees and expenses.
- d. Arizona Counsel: \$14,733.50 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 June 2025.

Honorable Dustin B. Pead
United States Magistrate Judge