

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 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.

**THIRTY-FIRST INTERIM FEE
APPLICATION**

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

Judge Tena Campbell

Magistrate Judge Dustin Pead

Jonathan O. Hafen, the Court-Appointed Receiver over the assets of the following Defendants and Relief Defendants: Rust Rare Coin Inc. (“RRC”), Gaylen Dean Rust, R Legacy Racing Inc., R Legacy Entertainment LLC, R Legacy Investments LLC, Denise Gunderson Rust, Joshua Daniel Rust, and Aleesha Rust Franklin (collectively, “Receivership Defendants”), hereby submits this thirty-first interim fee application (this “Fee Application”), seeking approval by the Court for the fees and expenses incurred by the Receiver; the Receiver’s counsel, Parr Brown Gee & Loveless (“Parr Brown”) and Sacks Tierney P.A. (“Arizona Counsel”); and the Receiver’s accountants, Berkeley Research Group (“BRG”), for the period of April 1, 2026, through June 30, 2026 (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 *Thirty-First Quarterly Status Report*, which includes a status report for the period of April 1, 2026, through June 30, 2026 (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, Parr Brown, Arizona Counsel, and BRG, as set forth below and in the attached Exhibits.

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

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

6. Parr Brown, Arizona Counsel and BRG have submitted their invoices to the

¹ Docket No. 588, filed August 3, 2026.

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 April 1, 2026, through June 30, 2026, the Receiver billed a total of 22.5 hours for services to the Receivership Estate. The Receiver is seeking approval for the payment of fees and expenses totaling \$12,375.00. *See Exhibit A.*

b. Parr Brown: From April 1, 2026, through June 30, 2026, Parr Brown billed a total of 66.6 hours for legal services to the Receivership Estate. Parr Brown is seeking approval for the payment of fees and expenses totaling \$28,654.00. *See Exhibit B.* These amounts include a voluntary write down of \$2,726.00.

c. BRG: From April 1, 2026, through June 30, 2026, BRG billed a total of 22.8 hours providing forensic, tax, and general accounting services to the Receivership Estate. BRG is seeking approval for the payment of fees and expenses totaling \$8,374.50. *See Exhibit C.* These amounts include a voluntary write down of \$1,176.00.

d. Arizona Counsel: From April 1, 2026, through June 30, 2026, Arizona Counsel billed a total of 1.9 hours for legal services to the Receivership Estate. Arizona Counsel is seeking approval for the payment of fees and expenses totaling \$881.00. *See Exhibit D.*

11. The amounts requested reflect a total of \$3,902.00 in voluntary reductions by the respective professionals in an exercise of their billing judgment.

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

V. SUMMARY OF EXHIBITS

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

14. The Receiver, Parr Brown, 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 B-Time Records of Parr Brown

Exhibit B Summary by Task

19. 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

20. 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

21. 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 recovered \$205,800 pursuant to 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-5 Claims Administration

22. 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

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

Recovery Litigation

24. BRG continued to be involved in assisting the Receiver in ongoing litigation matters. BRG analyzed the activity and transactions, including supporting documents, for investors for whom the Receiver has filed claw back actions. BRG met with counsel to discuss various issues associated with these matters. Pursuant to counsel requests, BRG reviewed and responded to emails and provided supporting documents and other information regarding these matters.

Tax Compliance, Analysis and Preparation

25. BRG analyzed transactions for the period of January 1, 2025, through December 31, 2025, in order to identify taxable receipts, deductible expenditures, and other reportable activity for the preparation of the 2025 income tax returns. BRG prepared additional supporting work papers to be used in the preparation of the 2025 income tax returns of the receivership. BRG prepared the 2025 receivership federal and state income tax returns. The completed returns were reviewed for completeness and accuracy. Corrections and revisions were made as was required.

26. BRG prepared, reviewed and filed federal and state payroll tax returns for Q1 2026

in connection with the distributions made related to the wage claims of former employees of Rust Rare Coin.

Exhibit D-Time Records of Arizona Counsel

27. 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

28. The Receiver has previously filed thirty interim fee applications,² all of which were

² The Receiver's First Interim Fee Application was filed on February 22, 2019. *See* Dkt. No. 120. The Receiver's Second Interim Fee Application was filed on May 24, 2019. *See* Dkt. No. 187. The Receiver's Third Interim Fee Application was filed on September 4, 2019. *See* Dkt. No. 241. The Receiver's Fourth Interim Fee Application was filed on December 31, 2019. *See* Dkt. No. 274. The Receiver's Fifth Interim Fee Application was filed on March 10, 2020. *See* Dkt. No. 292. The Receiver's Sixth Interim Fee Application was filed on August 7, 2020. *See* Dkt. No. 333. The Receiver's Seventh Interim Fee Application was filed on November 13, 2020. *See* Dkt. No. 367. The Receiver's Eighth Interim Fee Application was filed on January 15, 2021. *See* Dkt. No. 382. The Receiver's Ninth Interim Fee Application was filed on May 27, 2021. *See* Dkt. No. 413. The Receiver's Tenth Interim Fee Application was filed on July 6, 2021. *See* Dkt. No. 416. The Receiver's Eleventh Interim Fee Application was filed on October 5, 2021. *See* Dkt. No. 428. The Receiver's Twelfth Interim Fee Application was filed on December 13, 2021. *See* Dkt. No. 434. The Receiver's Thirteenth Interim Fee Application was filed on February 22, 2022. *See* Dkt. No. 442. The Receiver's Fourteenth Interim Fee Application was filed on June 14, 2022. *See* Dkt. No. 461. The Receiver's Fifteenth Interim Fee Application was filed on September 12, 2022. *See* Dkt. No. 481. The Receiver's Sixteenth Interim Fee Application was filed on December 14, 2022. *See* Dkt. No. 488. The Receiver's Seventeenth Interim Fee Application was filed on March 14, 2023. *See* Dkt. No. 494. The Receiver's Eighteenth Interim Fee Application was filed on June 12, 2023. *See* Dkt. No. 508. The Receiver's Nineteenth Interim Fee Application was filed on September 20, 2023. *See* Dkt. No. 516. The Receiver's Twentieth Interim Fee Application was filed on December 13, 2023. *See* Dkt. No. 528. 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. The Receiver's Twenty-Sixth Interim Fee Application was filed on June 23, 2025. *See* Dkt. No. 569. The Receiver's Twenty-Seventh Interim Fee Application was filed on

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, 564, 570, 574, 577, 580 and 586. This is the Thirty-First 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 professionals file final fee applications.

29. 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.

30. Pursuant to Paragraph 62 of the Appointment Order, *see* Dkt. No. 54, the Receiver represents and avers that this Fee Application complies with the terms of the billing instructions agreed to by the Receiver, the fees and expenses included therein were incurred in the best interests of the Receivership Estate, and the Receiver has not entered into any agreement, written or oral, express or implied, with any person or entity concerning the amount of compensation paid or to be paid from the Receivership Estate, or any sharing thereof.

31. The Receiver respectfully requests that the Court enter an Order (i) approving, on

September 22, 2025. *See* Dkt. No. 573. The Receiver's Twenty-Eighth Interim Fee Application was filed on December 18, 2025. *See* Dkt. No. 576. The Receiver's Twenty-Ninth Interim Fee Application was filed on March 16, 2026. *See* Dkt. No. 579. The Receiver's Thirtieth Interim Fee Application was filed on June 24, 2026. *See* Dkt. No. 585.

an interim basis, the Receiver's fees and expenses in the amount of \$12,375.00; Parr Brown's fees and expenses in the amount of \$28,654.00; BRG's fees and expenses in the amount of \$8,374.50; Arizona Counsel's fees and expenses in the amount of \$881.00, and (ii) authorizing the Receiver to pay these fees and reimburse the expenses from the Receivership Estate once the Receiver has recovered for the Estate at least three times the amount of fees requested in this Fee Application and prior applications.

32. 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 24th day of September 2026.

RECEIVER

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

PARR BROWN GEE & LOVELESS, P.C.

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

BERKELEY RESEARCH GROUP

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

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 **THIRTY-FIRST INTERIM FEE APPLICATION** was (1) electronically filed with the Clerk of the Court through the CM/ECF system on September 24, 2026, 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.

Kristen R. Angelos UTAH FEDERAL DEFENDER OFFICE 46 W BROADWAY STE 110 SALT LAKE CITY, UT 84101 kris_angelos@fd.org	Walter F. Bugden BUGDEN & ISAACSON LLC 445 E 200 S STE 150 SALT LAKE CITY, UT 84111 wally@bilaw.net
Jennifer Juniper Chapin COMMODITY FUTURES TRADING COMMISSION 4900 MAIN ST STE 500 KANSAS CITY, MO 64112 jchapin@cftrc.gov	Tara L. Isaacson LLC BUGDEN & ISAACSON LLC 445 E 200 S STE 150 SALT LAKE CITY, UT 84111 tara@bilaw.net
Andrew G. Deiss DEISS LAW PC 10 W 100 S STE 425 SALT LAKE CITY, UT 84101 adeiss@deisslaw.com	Sean N. Egan SOUTH TEMPLE TOWER STE 1505 136 E SOUTH TEMPLE SALT LAKE CITY, UT 84111-1139 seannegan@sneganlaw.com
Wayne Klein KLEIN & ASSOCIATES PO BOX 1836 SALT LAKE CITY, UT 84110 wklein@kleinutah.com	Kristen R. Angelos FEDERAL PUBLIC DEFENDER DISTRICT OF UTAH 46 W ROADWAY STE 110 SALT LAKE CITY, UT 84101
Paula Woodland Faerber UTAH ATTORNEY GENERALS OFFICE 160 E 300 S 5TH FLOOR SALT LAKE CITY, UT 84114 pfaerber@agutah.gov	Jacob L. Fannesbeck SMITH WASHBURN LLP 8 E BROADWAY STE 320 SALT LAKE CITY, UT 84111 jfannesbeck@smithwashburn.com
Robert K. Hunt UTAH FEDERAL DEFENDER OFFICE 46 W BROADWAY SUITE 110 SALT LAKE CITY, UTAH 84101 robert_hunt@fd.org	Jennifer R. Korb UTAH ATTORNEY GENERAL'S OFFICE 160 E 300 S 5TH FL SALT LAKE CITY, UT 84114 jkorb@agutah.gov

Monique McElwee COMMODITY FUTURES TRADING COMMISSION 4900 MAIN ST STE 500 KANSAS CITY, MO 64112 mmcelwee@cftc.gov	Corey Drew Riley DEISS LAW PC 10 W 100 S STE 425 SALT LAKE CITY, UT 84101 criley@deisslaw.com
John Robinson, Jr. DEISS LAW PC 10 W 100 S STE 425 SALT LAKE CITY, UT 84101 jrobinson@deisslaw.com	Thomas L. Simek COMMODITY FUTURES TRADING COMMISSION 4900 MAIN ST STE 500 KANSAS CITY, MO 64112 tsimek@cftc.gov
Jessica Stengel FEDERAL PUBLIC DEFENDER DISTRICT OF UTAH 46 W BROADWAY STE 110 SALT LAKE CITY, UT 84101 jessica_stengel@fd.org	Megan K. Baker DORSEY & WHITNEY LLP 111 S MAIN ST 21ST FL SALT LAKE CITY, UT 84111-2176 baker.megan@dorsey.com
D. Loren Washburn SMITH WASHBURN LLP 8 E BROADWAY STE 320 SALT LAKE CITY, UT 84111 lwashburn@smithwashburn.com	Steven T. Waterman DORSEY & WHITNEY LLP 111 S MAIN ST 21ST FL SALT LAKE CITY, UT 84111-2176 waterman.steven@dorsey.com
David C. Castleberry OGLETREE DEAKINS NASH SMOAK & STEWART PC 2050 S 1300 E STE 500 SALT LAKE CITY, UT 84106 david.castleberry@ogletreedeakins.com	

/s/ Lori Stumpf

EXHIBIT A

EXHIBIT A

THIRTY-FIRST INTERIM FEE APPLICATION

Time Records of Receiver

EXHIBIT A

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

Rust Rare Coin Receiver

July 15, 2026

Invoice: 983790
Client: 177110
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration

Professional Services	\$ 7,480.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 7,480.00



PARR BROWN GEE & LOVELESS

Invoice: 983790
Rust Rare Coin Receiver
Administration

July 15, 2026
Client: 177110
Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/08/26	JOH	Review information relating to motion in clawback action; Email with legal counsel re same; Attention to HOA issue relating to receivership property; Follow up with legal counsel re same; Research re home values in area and related matters; Review information re title commitments and related matters; Follow up re status of tax matter; Review related document and email correspondence	3.10	1,705.00
4/09/26	JOH	Prepare for and participate in client calls; Email with W. Peterson re case background and strategy; Email with client re insurance matter; Research re ratification issue; Draft correspondence to opposing party	1.70	935.00
4/16/26	JOH	Review settlement agreement; Email with legal counsel re same; Review related email correspondence; Review document related to real estate matter; Review related email correspondence	1.30	715.00
4/21/26	JOH	Attention to tax matter; Review related documents and email correspondence; Email with accountant re same	.40	220.00
4/24/26	JOH	Attention to title matter involving receivership property; Review email correspondence and documentation re same; Initial review of quarterly report; Review related email correspondence and documents; Follow up re clawback action	1.20	660.00
4/30/26	JOH	Attention to quarterly report; Review prior email correspondence and documents re two clawback actions; Email with legal counsel re quarterly report	.90	495.00
5/28/26	JOH	Review email correspondence from opposing counsel re Kingman property	.10	55.00
6/01/26	JOH	Review materials relating to Kingan property; Email with legal counsel re same; Research re property sales in area	.80	440.00
6/05/26	JOH	Review materials from title company relating to Kingman property; Follow up re same	.50	275.00
6/08/26	JOH	Attention to potential sale of real property; Review related email correspondence; Follow up re pricing question; Attention to lien issue; Research re same; Review related email correspondence	1.30	715.00
6/09/26	JOH	Follow up re preparing real property for sale; Review related document and email correspondence	.80	440.00
6/22/26	JOH	Review materials relating to potential sale of real property	.70	385.00
6/25/26	JOH	Further analysis of documents relating to potential real property transaction; Email with legal counsel re same	.80	440.00

TOTAL PROFESSIONAL SERVICES**\$ 7,480.00**

PARR BROWN GEE & LOVELESS

Invoice: 983790
Rust Rare Coin Receiver
Administration

July 15, 2026
Client: 177110
Matter: 1

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	550.00	13.60	7,480.00
TOTALS		13.60	\$ 7,480.00

TOTAL THIS INVOICE **\$ 7,480.00**

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

July 15, 2026

Rust Rare Coin Receiver

Invoice: 983790
Client: 177110
Matter: 1

REMITTANCE ADVICE**RE: Administration**

BALANCE DUE THIS INVOICE**\$ 7,480.00**

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 # 983790****Online Payments:** <https://parrbrown.com/payment-portal>**Payments accepted by phone (801) 532-7840****Payable Upon Receipt**

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



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

Rust Rare Coin Receiver

July 15, 2026

Invoice: 985218
Client: 177110
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Assett Analysis & Recovery

Professional Services	\$ 4,895.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 4,895.00

PARR BROWN GEE & LOVELESS

Invoice: 985218
Rust Rare Coin Receiver
Asset Analysis & Recovery

July 15, 2026
Client: 177110
Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/01/26	JOH	Call with counsel for bank re class action and related matters; Attention to multiple clawback settlements; Review related documents; emailing with legal counsel re one of potential clawback settlements; Follow up re tax matter; Review related documents and email correspondence	2.60	1,430.00
4/02/26	JOH	Review documents relating to clawback settlement; Review prior email correspondence	.30	165.00
4/06/26	JOH	Review documents relating to clawback action; Follow up re potential resolution of claim	1.00	550.00
6/10/26	JOH	Analyze various clawback actions to assess settlement potential; Review related documents and email correspondence	1.30	715.00
6/12/26	JOH	Email with legal counsel re clawback actions; Additional review of related documents; Review materials relating to music rights; Review email correspondence from legal counsel re same	1.40	770.00
6/16/26	JOH	Prepare for and participate in meeting with legal counsel re group of clawback actions; Review related email correspondence and documents; Follow up re real property title	.90	495.00
6/23/26	JOH	Further review of documents relating to clawback action; Follow up with counsel re potential resolution of clawback defendant group; Review real estate documentation	1.40	770.00

TOTAL PROFESSIONAL SERVICES

\$ 4,895.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	550.00	8.90	4,895.00
TOTALS		8.90	\$ 4,895.00

TOTAL THIS INVOICE

\$ 4,895.00

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

July 15, 2026

Rust Rare Coin Receiver

Invoice: 985218
Client: 177110
Matter: 2

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

BALANCE DUE THIS INVOICE**\$ 4,895.00**

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 # 985218****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 B

EXHIBIT B

T THIRTY-FIRST INTERIM FEE APPLICATION

Time Records of Parr Brown

EXHIBIT B

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

Rust Rare Coin Receivership

July 15, 2026

Invoice: 983787
Client: 176430
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration of Receivership Estate

Professional Services	\$ 6,413.00
Total Costs Advanced	<u>\$ 74.06</u>
TOTAL THIS INVOICE	\$ 6,487.06

PARR BROWN GEE & LOVELESS

Invoice: 983787
Rust Rare Coin Receivership
Administration of Receivership Estate

July 15, 2026
Client: 176430
Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/06/26	WOP	Review and redact attorney time sheets; Correspond with Arizona counsel; Continue draft of quarterly report	3.40	1,241.00
4/07/26	JAB	Review attorney fees and costs	.40	N/C
4/07/26	WOP	Email correspondence with Arizona counsel; Reconcile discrepancies between Arizona's balance of amounts due; Emails re same	2.40	876.00
4/08/26	JMC	Correspond with Jeff Balls re Guyon objection; Review Howell title report	.20	103.00
4/08/26	WOP	Review and redact attorney time sheets; Further correspondence with Arizona counsel; Office conference with Jenny Buelt re summary of quarterly receipts for quarterly report; Review the same; Email to Jeff Balls re same	2.10	766.50
4/10/26	JAB	Correspond with Walter Peterson re quarterly report	.10	44.50
4/23/26	WOP	Review attorney time sheets; Revise quarterly report; Create exhibits; Email to Jeff Balls re same	1.30	474.50
4/24/26	JAB	Review quarterly report; Correspond with Jonathan Hafen re same	.70	311.50
4/30/26	JMC	Review quarterly report	.10	51.50
4/30/26	WOP	Email correspondence with Jeff Balls re filing quarterly report	.20	73.00
5/08/26	JAB	Review case status of litigation matters; Review status of settlements	.60	267.00
6/01/26	JMC	Correspond with Jeff Balls re ancillary proceedings	.10	51.50
6/02/26	WOP	No Charge - Correspond with BRG and Arizona counsel re fee application	.40	N/C
6/03/26	JMC	Correspond with a creditor and Jeff Balls re future distributions	.20	103.00
6/04/26	WOP	No Charge - Continue draft of fee application; Email correspondence with BRG and Arizona counsel; Call with Chloe re invoices; Review and revise the same; Create exhibits re same	3.70	N/C
6/10/26	JAB	Review status of settlements	1.90	845.50
6/10/26	WOP	No Charge - Email correspondence with BRG; Update fee application to include BRG narrative and invoice details; Create new exhibit; Email to Jeff Balls re same	1.20	N/C
6/12/26	JAB	No Charge - Correspond with Jonathan Hafen re attorney fees; Correspond with government re same	.30	N/C
6/13/26	JMC	No Charge - Review thirtieth fee application; Correspond with Jef Balls re the same	.30	N/C
6/19/26	JAB	No Charge - Correspond with government re attorney fee application	.10	N/C
6/22/26	JMC	No Charge - Correspond with Jeff Balls re fee application	.20	N/C
6/22/26	JAB	No Charge - Coordinate filing of attorney fees application	.10	N/C
6/24/26	JAB	No Charge - Review court order approving fees; Coordinate payment of fees	.30	N/C
6/26/26	WOP	Review docket history; Review prior quarterly reports in preparation for thirty-first quarterly report; Begin draft of same	3.30	1,204.50

PARR BROWN GEE & LOVELESS

Invoice: 983787
Rust Rare Coin Receivership
Administration of Receivership Estate

July 15, 2026
Client: 176430
Matter: 1

TOTAL PROFESSIONAL SERVICES \$ 6,413.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	515.00	.60	309.00
Jeffery A Balls	445.00	3.70	1,646.50
Walter O Peterson	365.00	12.70	4,635.50
TOTALS		17.00	\$ 6,487.06

COSTS ADVANCED

Date	Description	Amount
4/16/26	Simplifile - County Recording Fees	15.00
4/22/26	Grasshopper - monthly service	20.00
5/22/26	Grasshopper - monthly service	19.53
6/21/26	Grasshopper - monthly service	19.53

TOTAL COSTS ADVANCED \$ 74.06

TOTAL THIS INVOICE \$ 6,487.06

**PARR BROWN
& LOVELESS**
ATTORNEYS AT LAW

July 15, 2026

Rust Rare Coin Receivership

Invoice: 983787
Client: 176430
Matter: 1

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

BALANCE DUE THIS INVOICE**\$ 6,487.06**

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 # 983787****Online Payments:** <https://parrbrown.com/payment-portal>**Payments accepted by phone (801) 532-7840**

Payable Upon Receipt

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



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

Rust Rare Coin Receivership

July 15, 2026

Invoice: 983788
Client: 176430
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Asset Analysis & Recovery

Professional Services	\$ 21,292.00
Total Costs Advanced	<u>\$ 73.94</u>
TOTAL THIS INVOICE	\$ 21,365.94



PARR BROWN GEE & LOVELESS

Invoice: 983788
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2026
Client: 176430
Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/01/26	JAB	Review scheduling order	.80	356.00
4/02/26	JAB	Correspond with Ryan Pahnke re settlement	.10	44.50
4/06/26	JAB	Review bankruptcy filings for Darren Nelson; Draft notice of settlement	.50	222.50
4/07/26	JAB	Review settlement payments	.20	89.00
4/08/26	JAB	Review settlement check	.20	89.00
4/08/26	JAB	Review motion to amend judgment	.80	356.00
4/09/26	JMC	Review Lugli settlement proposal; Correspond with Jeff Balls and Jon Hafen re Darren Nelson dismissal	.30	154.50
4/15/26	JAB	Review status of claims; Draft opposition to motion to reconsider	1.80	801.00
4/16/26	JAB	Correspond with Ryan Pahnke re settlement agreement; Record release of trust deed; Correspond with Tammy Wooten re same	1.20	534.00
4/17/26	JAB	Draft opposition to motion to reconsider	1.50	667.50
4/20/26	JAB	Draft opposition memorandum to motion to alter or amend orders	3.50	1,557.50
4/21/26	JAB	Draft opposition to motion to reconsider	3.50	1,557.50
4/22/26	JAB	Draft opposition to motion to reconsider	4.60	2,047.00
4/23/26	JAB	Telephone conference with M. Chard; Telephone conference with Ryan Pahnke re settlement payment and claims; Telephone conference with Jeff Shaw re BRG analysis	1.10	489.50
4/24/26	JAB	Correspond with Jeff Shaw re analysis for settlement; Draft motion to dismiss lawsuit against Darren Nelson; Review correspondence from M. Chard; Correspond with Ryan Pahnke	.80	356.00
4/27/26	JAB	Review settlement payment; Correspond with Ryan Pahnke; Telephone conference with Jeff Shaw; Review Wade analysis	.80	356.00
4/28/26	JAB	Correspond with Ryan Pahnke; Draft notice of dismissal	.80	356.00
4/30/26	JAB	Review notice of case termination	.50	222.50
5/04/26	JAB	Review financial transactions for litigation claims; Review settlement offer	.70	311.50
5/05/26	JAB	Review reply memorandum	.40	178.00
5/13/26	JAB	Telephone conference with Dominic Shaw; Call Ryan Pahnke	.40	178.00
5/14/26	JAB	Telephone conference with Ryan Pahnke	.30	133.50
5/15/26	JAB	Draft stipulated motions for extension of time; Correspond with Jeff Shaw; Correspond with Ryan Pahnke; Correspond with Dominic Shaw	2.00	890.00
5/27/26	JAB	Review transactions for litigation claim; Telephone conference with Dominic Shaw and Todd Lugli; Review documents	2.40	1,068.00
6/03/26	JAB	Correspond with Joseph Covey re distributions	.30	133.50
6/05/26	JAB	Review documents re closing of Arizona property	.50	222.50
6/08/26	JAB	Correspond with Nicole Nijdl re closing of property; Correspond with Jim Samuelson re release of lien; Review settlement documents; Review closing documents	2.10	934.50

PARR BROWN GEE & LOVELESS

Invoice: 983788
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2026
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
6/09/26	JAB	Correspond with Nicole Nijdl; Correspond with Rebecca Lopez re music rights	1.60	712.00
6/10/26	JAB	Analyze claims; Correspond with Jonathan Hafen re same	2.70	1,201.50
6/11/26	JAB	Correspond with Jim Samuelson re release of lien	.10	44.50
6/12/26	JAB	Correspond with Jonathan Hafen re assignment of music rights; Correspond with Jonathan Hafen re settlements	.30	133.50
6/15/26	JAB	Correspond with Jim Samuelson; Correspond with Nicole Nijdl re closing	.80	356.00
6/16/26	JAB	Conference with Jonathan Hafen; Correspond with Jim Samuelson; Review correspondence from Nicole Nijdl; Correspond with Dominic Shaw	1.50	667.50
6/17/26	JAB	Review documents re litigation status	.40	178.00
6/18/26	JAB	Finalize quitclaim of music; Correspond with Rebecca Lopez	1.10	489.50
6/19/26	JAB	Review correspondence from Jim Samuelson and Nicole Nijdl	.10	44.50
6/22/26	JAB	Review correspondence from Jim Samuelson re closing of Arizona property; Correspond with title company re closing	.30	133.50
6/23/26	JAB	Correspond with Matt Boley re settlement closing; Review documents for Luglis; Correspond with Jonathan Hafen; Call Ryan Phanke	1.70	756.50
6/24/26	JAB	Call Ryan Pahnke	.30	133.50
6/24/26	JAB	Review receivership website; Conference with Brandon Pringle	.60	267.00
6/25/26	JAB	Review closing documents; Review correspondence from Jim Samuelson; Telephone conference with Dominic Shaw; Review documents from Dominic Shaw	1.40	623.00
6/29/26	JAB	Review discovery responses; Review accounting documents; Analyze strategy for summary judgment	2.00	890.00
6/30/26	JAB	Draft reply motion	.80	356.00

TOTAL PROFESSIONAL SERVICES**\$ 21,292.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Joseph M R Covey	515.00	.30	154.50
Jeffery A Balls	445.00	47.50	21,137.50
TOTALS		47.80	\$ 21,292.00

COSTS ADVANCED

Date	Description	Amount
4/30/26	Sandline - eDiscovery	16.00
5/31/26	Sandline - eDiscovery	16.00
6/22/26	PACER - electronic court records	4.90
6/30/26	SimpleCertified Mail	21.04
7/31/26	Sandline - eDiscovery	16.00

PARR BROWN GEE & LOVELESS

Invoice: 983788
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2026

Client: 176430

Matter: 2

TOTAL COSTS ADVANCED**\$ 73.94****TOTAL THIS INVOICE****\$ 21,365.94**

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

July 15, 2026

Rust Rare Coin Receivership

Invoice: 983788
Client: 176430
Matter: 2

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

BALANCE DUE THIS INVOICE**\$ 21,365.94**

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 # 983788****Online Payments:** <https://parrbrown.com/payment-portal>**Payments accepted by phone (801) 532-7840**

Payable Upon Receipt

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



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

Rust Rare Coin Receivership

July 15, 2026

Invoice: 983789
Client: 176430
Matter: 5

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Claims Administration

Professional Services	\$ 801.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 801.00



PARR BROWN GEE & LOVELESS

Invoice: 983789
Rust Rare Coin Receivership
Claims Administration

July 15, 2026
Client: 176430
Matter: 5

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/20/26	JAB	Telephone conference with claimant	.20	89.00
5/18/26	JAB	Correspond with claimants re records of purchases	.90	400.50
6/24/26	JAB	Correspond with claimants re distributions	.70	311.50

TOTAL PROFESSIONAL SERVICES **\$ 801.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jeffery A Balls	445.00	1.80	801.00
TOTALS		1.80	\$ 801.00

TOTAL THIS INVOICE **\$ 801.00**

**PARR BROWN
& LOVELESS**
ATTORNEYS AT LAW

July 15, 2026

Rust Rare Coin Receivership

Invoice: 983789
Client: 176430
Matter: 5

REMITTANCE ADVICE**RE: Claims Administration**

BALANCE DUE THIS INVOICE**\$ 801.00**

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 # 983789****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

THIRTY-FIRST 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

August 14, 2026
Client-Project: 016222-025457
Invoice #: 10052494
Tax ID: 27-1451273

Via Email: jhafen@parrbrown.com

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

Services Rendered From April 1, 2026 Through June 30, 2026

Professional Services	\$	9,540.00	USD
Voluntary Reduction		(1,176.00)	
Expenses Incurred		10.50	
CURRENT CHARGES	\$	8,374.50	USD

PAYMENT IS DUE BY SEPTEMBER 13, 2026

Please direct questions regarding this invoice to: Jeffrey Shaw at JShaw@thinkbrg.com.

Please remit EFT (Electronic Funds Transfer) payment to:

Bank Name: PNC BANK, N.A.
SWIFT/BIC: PNCCUS33
ABA #: 031207607
Account Name: Berkeley Research Group LLC
Account #: 8026286672
Reference: 10052494

Please remit check payment to:

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

Please remit express/overnight payment to:

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

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



INVOICE

Page 2 of 6

Invoice # 10052494

Client-Project: 016222-025457

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

Services Rendered From April 1, 2026 Through June 30, 2026

PROFESSIONAL SERVICES

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Associate Director			
Leif Larsen	425.00	13.20	5,610.00
Jeffrey Shaw	420.00	6.40	2,688.00
Jeffrey Shaw	0.00	2.80	N/C
Case Assistant			
Kellee Calder	165.00	0.40	66.00
Total Professional Services		22.80	8,364.00

EXPENSES

Computer Software	10.50
Total Expenses	10.50



INVOICE

Page 3 of 6

Invoice # 10052494

Client-Project: 016222-025457

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

Services Rendered From April 1, 2026 Through June 30, 2026

SUMMARY BY TASK CODE

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
500	Recovery Litigation	6.10	2,562.00
600	Tax Compliance & Analysis	4.10	1,689.00
610	Income Tax Preparation	9.80	4,113.00
950	Fee Application Preparation & Hearing	2.80	N/C
Total Professional Services		22.80	8,364.00



INVOICE

Page 4 of 6

Invoice # 10052494

Client-Project: 016222-025457

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

Services Rendered From April 1, 2026 Through June 30, 2026

DETAIL OF PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 500 - Recovery Litigation					
04/23/26	Jeffrey Shaw	Call with counsel to discuss Wade group litigation.	0.20	420.00	84.00
04/23/26	Jeffrey Shaw	Analyzed Wade transaction and activity.	1.30	420.00	546.00
04/24/26	Jeffrey Shaw	Call and emails with counsel regarding Wade group activity.	0.40	420.00	168.00
04/27/26	Jeffrey Shaw	Call with counsel regarding Wade litigation.	0.10	420.00	42.00
04/27/26	Jeffrey Shaw	Analyzed Wade investment activity.	1.30	420.00	546.00
04/27/26	Jeffrey Shaw	Reviewed, prepared transaction detail schedules of Wade activity and submitted to counsel.	2.40	420.00	1,008.00
05/15/26	Jeffrey Shaw	Reviewed and responded to email regarding litigation issues.	0.20	420.00	84.00
05/26/26	Jeffrey Shaw	Follow-up with counsel regarding litigation issues.	0.20	420.00	84.00
Total for Task Code 500			6.10		2,562.00
Task Code: 600 - Tax Compliance & Analysis					
04/01/26	Jeffrey Shaw	Prepared email regarding tax filing.	0.30	420.00	126.00
04/17/26	Leif Larsen	Prepared first quarter 2026 federal payroll returns.	1.60	425.00	680.00
04/17/26	Leif Larsen	Prepared first quarter 2026 state payroll returns and contacted state workforce services for correspondence related to account closure.	1.70	425.00	722.50
04/21/26	Kellee Calder	Prepared Q1 Form 941 tax return for the Trustee's review and required signatures for 2026.	0.20	165.00	33.00
04/21/26	Leif Larsen	Reviewed and signed first quarter 2026 payroll tax returns.	0.30	425.00	127.50
Total for Task Code 600			4.10		1,689.00
Task Code: 610 - Income Tax Preparation					
05/11/26	Leif Larsen	Analyzed 2025 transactions to determine proper tax reporting and finalized the 2025 supporting work papers.	2.90	425.00	1,232.50
05/12/26	Leif Larsen	Reviewed and referenced the 2025 income tax returns and supporting work papers.	1.50	425.00	637.50
05/12/26	Leif Larsen	Updated and finalized the 2025 state income tax return.	1.90	425.00	807.50
05/12/26	Leif Larsen	Updated and finalized the 2025 federal income tax return.	2.80	425.00	1,190.00
05/20/26	Kellee Calder	Prepared tax returns for the Receiver's review and required signatures for 2025.	0.20	165.00	33.00
06/30/26	Leif Larsen	Performed final review of the 2025 receivership income tax returns and provided to receiver for his review.	0.50	425.00	212.50
Total for Task Code 610			9.80		4,113.00
Task Code: 950 - Fee Application Preparation & Hearing					
06/04/26	Jeffrey Shaw	[NC] Reviewed and revised time entries and descriptions (Jan-Mar).	0.80	0.00	N/C
06/05/26	Jeffrey Shaw	[NC] Reviewed and determined 2026 bill rates.	0.50	0.00	N/C
06/10/26	Jeffrey Shaw	[NC] Prepared fee application narrative.	0.60	0.00	N/C



INVOICE

Page 5 of 6

Invoice # 10052494

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

Client-Project: 016222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
06/10/26	Jeffrey Shaw	[NC] Reviewed, finalized and submitted Q1 bill and narrative for fee application.	0.90	0.00	N/C
Total for Task Code 950			2.80		0.00
Total Professional Services			22.80		8,364.00



INVOICE

Page 6 of 6

Invoice # 10052494

Client-Project: 016222-025457

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

DETAIL OF EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
Computer Software		
04/23/26	Computer Software - 04/23/26	10.50
	Total for Computer Software	10.50
Total Expenses		10.50

EXHIBIT D

EXHIBIT D THIRTY-FIRST INTERIM FEE APPLICATION Time Records of Arizona Counsel

EXHIBIT D

SacksTierney P.A.

ATTORNEYS

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

Parr Brown Gee & Loveless
101 South 200 East Ste. 700
Salt Lake City, UT 84111**Attention: Jeff Balls**

July 10, 2026

Client: PA123

Matter: 00008

Invoice #: 1326940

Page: 1

RE: Gretchen Howell BK - Jonathan Hafen Creditor

For Professional Services Rendered Through June 30, 2026

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
06/22/2026	JSS	Draft letter to escrow officer, N. Nijdl; fed ex same with signed release; email to J. Balls re: same..	1.00	\$440.00	\$440.00
06/22/2026	SDE	Finalize release of judgment lien.	0.20	\$240.00	\$48.00
06/24/2026	JSS	Follow up with Nicole at Fidelity re: fed ex with release and instructions; review re: next steps.	0.40	\$440.00	\$176.00
06/25/2026	JSS	Email from N. Nijdl at First American with signed letter; email to J. Balls re: same.	0.30	\$440.00	\$132.00
Total Professional Services			1.90		\$796.00

SUMMARY

		Hours	Rate	Amount
JSS	James Scott Samuelson	1.70	\$440.00	\$748.00
SDE	Susan D. Ensslin	0.20	\$240.00	\$48.00

Total Services	\$796.00
Total Current Charges	\$796.00
Previous Balance	\$598.00
Less Payments	(\$513.00)
PAY THIS AMOUNT	\$881.00

SacksTierney P.A.

A T T O R N E Y S

July 10, 2026

Client: PA123

Matter: 00008

Invoice #: 1326940

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

**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 THIRTY-FIRST
INTERIM FEE APPLICATION**

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

Judge Tena Campbell

Magistrate Judge Dustin Pead

Before the Court is the thirty-first interim fee application (the “Fee Application”), submitted by Jonathan O. Hafen in his capacity as the Court-Appointed Receiver for Rust Rare Coin Inc., Gaylen Dean Rust, R Legacy Racing Inc., R Legacy Entertainment LLC, R Legacy Investments LLC, Denise Gunderson Rust, and Joshua Daniel Rust (collectively, “Defendants”) seeking approval by the Court for the fees and expenses incurred by the Receiver; the Receiver’s counsel, Parr Brown Gee & Loveless (“Parr Brown”), Sacks Tierney P.A. (“Arizona Counsel”),

and the Receiver's accountants, Berkeley Research Group ("BRG"), for the period of April 1, 2026, through June 30, 2026 (the "Application Period"), and authorization to pay all allowed fees and expenses from funds of the Receivership Estate.

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

IT IS HEREBY ORDERED that:

1. The Fee Application is GRANTED; and
2. The Receiver is hereby authorized to pay the fees and expenses incurred by the Receiver, Parr Brown, BRG and Arizona Counsel, as follows:

- a. Receiver: \$12,375.00 for fees and expenses.
- b. Parr Brown: \$28,654.00 for fees and expenses.
- c. BRG: \$8,374.50 for fees and expenses.
- d. Arizona Counsel: \$881.00 for fees and expenses.

3. The Receiver and his professionals shall not receive payment of any approved fees or reimbursement of expenses from the Receivership Estate until the Receiver has recovered for the Receivership Estate an amount equal to at least three times the aggregate amount of fees requested in this Fee Application and all prior fee applications..

DATED this ____ day of September, 2026.

Honorable Dustin B. Pead
United States Magistrate Judge