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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.

**ELEVENTH 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 eleventh interim fee application (this "Fee Application"), seeking approval by the Court for the fees and expenses incurred by the Receiver; the Receiver's counsel, Parr Brown Gee & Loveless ("Parr Brown"); the Receiver's accountants, Berkeley Research Group ("BRG"); and the Conflict Receiver, Wayne Klein, and his counsel, Manning Curtis Bradshaw & Bednar, for the period of April 1, 2021 through June 30, 2021 (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 *Eleventh Quarterly Status Report*, which includes a status report for the period of April 1, 2021, through June 30, 2021 (the "Eleventh Status

Report").[1] The Eleventh 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, his team, and the Conflict Receiver and his counsel 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, BRG and the Conflict Receiver have submitted their invoices to the Receiver, and the Receiver has reviewed and approved the invoices.

[1] Docket No. 421 filed July 30, 2021.

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

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

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

## IV. SUMMARY OF AMOUNTS REQUESTED

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

a. Receiver: From April 1, 2021, through June 30, 2021, the Receiver billed a total of 61.8 hours for services to the Receivership Estate. The Receiver is seeking approval for the payment of fees totaling $22,248. *See* Exhibit A.

b. Parr Brown: From April 1, 2021, through June 30, 2021, Parr Brown

billed a total of 1,340.2 hours for legal services to the Receivership Estate. Parr Brown is seeking approval for the payment of fees and expenses totaling $351,776.51 of which $348,887 is for fees and $2,879.51 is for out-of-pocket expenses. *See* Exhibit B. These amounts include a voluntary write down of $9,615.

c. BRG: From April 1, 2021, through June 30, 2021, BRG billed a total of 218.90 hours providing forensic, tax, and general accounting services to the Receivership Estate. BRG is seeking approval for the payment of fees and expenses totaling $73,165.81 of which $73,078 is for fees and $87.81 is for out-of-pocket expenses. *See* Exhibit C. These amounts include a voluntary write down of $1,267.50.

d. Conflict Receiver and counsel: From April 1, 2021, through June 30, 2021, Conflict Receiver, Wayne Klein, and his legal counsel billed a total of 58.5 hours for services to the Receivership Estate. The Conflict Receiver and his counsel are seeking approval for the payment of fees and expenses totaling $15,684.98 of which $14,795 is for fees and $889.98 is for expenses. *See* Exhibit D. These amounts include a voluntary write down of $2,500.

11. The amounts requested reflect a total of $13,382.50 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, BRG, the Conflict Receiver and his counsel 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**

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**

The Receiver continued to communicate with the 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.

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

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

**Exhibit A-3 Disposition of Assets**

The Receiver oversaw and coordinated the negotiation and/or sale of various real and personal property during the Application Period. The Receiver worked with his legal counsel and industry experts to sell the properties formerly held by Denise Rust. The Receiver also worked with local counsel to complete the sale of Angler's Roost.

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

**Exhibit B Summary by Task**

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**

During this Application Period, Parr Brown continued to manage and keep secure the various real and personal property within the Receivership Estate. Parr Brown continued posting motions and Court orders on the Receiver's website and also making 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**

As previously reported, after analyzing the cash and metal transactions associated with Mr. Rust's silver pool, Parr Brown was able to identify potential net winners of the Receivership Estate. In order to preserve the Receiver's right to recover funds from net winners, Parr Brown continued to work the 30 separate claw back actions filed against approximately 124 investors (the "Claw Back Defendants"). Parr Brown also continued working with the 170 potential net winners (the "Net Winners") with whom they executed tolling agreements in order to facilitate further discussion and negotiations regarding their transactions with the Receivership Defendants. As a result of the Court granting the Receiver's Motion for Settlement Authority

(*See* Dkt. No. 271), Parr Brown worked diligently to communicate and meet with Claw Back Defendants and Net Winners, and their counsel, to secure favorable settlement agreements where possible. When settlement agreements have not been reached, Parr Brown has taken those actions necessary to move numerous cases forward through the litigation process. Given the vast number of Claw Back Defendants and Net Winners, these recovery efforts have required a significant amount of analysis and review. Parr Brown continues to work closely with the Receiver to finalize agreements and negotiate with investors and creditors to increase the number of settlement agreements. Currently, there are over 22 settlement agreements in varying phases of final approval. These agreements attempt to get the largest return of funds while minimizing administrative burden to the Receivership Estate.

**Exhibit B-3 Disposition of Assets**

Parr Brown continues to work closely with the Receiver to coordinate the sale of both real and personal property. As reported, Parr Brown entered into a settlement agreement with Denise Rust pursuant to which the Receiver took title to the home that she and her former husband lived in, along with the adjoining property and certain water rights. *See Dkt. No*. 387. Although the Receiver's real estate broker listed and marketed the property for sale for $1,950,000, the due diligence process revealed several issues with the property which hindered its resale value. Accordingly, the offers received to purchase the property were below the asking price. During this Application Period, the Receiver submitted to the Court an offer to purchase the Layton property for $1,600,000. *See Dkt. No*. 417.

Parr Brown continues to look for ways to recoup the millions of dollars that Gaylen Rust invested in various companies and projects. This Application Period, Parr Brown worked closely with the Receiver to close on the sale of Angler's Roost whereby over $95,000 was brought into

the Receivership.

**Exhibit B-4 Claims Administration**

1. As previously reported, Parr Brown arranged to have over 4,000 hardcopies of the Court-approved claim form sent out to all potential creditors of the Receivership Estate. In response to this process, Parr Brown has received over 623 claim forms from potential creditors. During this Application Period, Parr Brown continued the process of reviewing and verifying the various claim forms submitted to the Receivership Estate. This involves ongoing correspondence with both the Receiver and his accountants at BRG. To date, Parr Brown has reviewed all claim forms submitted by potential claimants to determine whether such claims will be allowed or subject to objection. All claim forms submitted by investors, trade vendors and customers have been analyzed by comparing the asserted losses with data from the books and records of the Receivership Defendants.

**Exhibit C—Time Records of BRG**

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

**Net Winner/Claims Analysis**

BRG has continued to assist the Receiver and his team in reviewing and analyzing filed claims to verify accuracy and reconcile differences between the amounts reported by investors and the data identified in RRC and bank records, as well as the recording and tracking of filed claims.

BRG has continued to perform extensive analysis of cash receipt and disbursement activity, transaction support, investor files, email communications, as well as information received from individual investors through questionnaire responses, claim filings, and document

requests for various investors and investor groups in order to identify and determine the amount of funds invested and draws taken by each individual / group. One of the complicating factors in this analysis is the quantity of transactions that are "non-cash" in nature. In its analysis, BRG has identified many non-cash transactions that occurred between RRC and investors that involve investments and draws using physical metals, which are then converted and credited to the investor's account. This information is not captured in the cash receipt and disbursement activity and is only identified through additional supporting information such as RRC receipts, email communications, investor statements and RRC investor files.

Notwithstanding the difficulties noted above, BRG's analysis has been critical in assisting the Receiver to identify and verify potential claw backs to pursue, as well as potential claims by investors. BRG has developed and provided analyses to the Receiver for various investors to be used in discussions, negotiations, and potential recoveries. BRG has also been involved in assisting the Receiver to respond to investors and their counsel in providing requested documents and support for its analyses. Additionally, BRG has assisted the Receiver in communications, including attending various meetings and calls, with investors and their counsel to obtain additional information and support regarding investment activity. BRG has worked with the Receiver and his counsel to analyze and review proposed settlement offers from investors to determine the appropriateness and accuracy of such offers and to provide guidance and recommendations in relation to these offers.

Finally, BRG has prepared an expert report, declarations and supporting schedules containing its analysis and findings of the alleged Rust Ponzi scheme and investor related activity in connection with various claw back litigations. Additionally, in connection with these claw back litigations, BRG has reviewed opposing expert reports, prepared for and attended

depositions of claw back defendants, and prepared to be deposed by opposing counsel.

**Tax Compliance, Analysis & Preparation**

BRG reviewed proposed amended Form 706 for completeness and accuracy. BRG responded to inquiries from investors regarding treatment as theft loss. BRG analyzed historical records to secure basis information related to certain assets to be sold in order to determine tax implications of sale.

BRG analyzed transactions for the period of October 1, 2020, through December 31, 2020, in order to identify taxable receipts, deductible expenditures and other reportable activity for the preparation of the 2020 income tax returns. BRG analyzed numerous 2020 cash transactions and researched the proper reporting for the preparation of the 2020 income tax returns of the receivership. BRG prepared additional supporting work papers to be used in the preparation of the 2020 income tax returns of the receivership. BRG prepared the 2020 receivership federal and state income tax returns. The completed returns were reviewed for completeness and accuracy. Corrections and revisions were made as was required. BRG prepared and filed required extension of time to file requests.

BRG reviewed correspondence received from taxing authorities and prepared responses as was required.

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

This section breaks down the total fees assessed by the Conflict Receiver and his counsel, which are discussed in more detail below.

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

correspond with investors and their legal counsel regarding the same. In addition, the Conflict Receiver worked closely with his counsel to brief and prepare for a hearing in the Zions Bank matter where the Court ordered Zions Bank to return $1.6 million dollars to the Receivership Estate. (*See* Dkt. No. 407).

## VI. PRIOR REQUESTS AND INTERIM NATURE OF REQUEST

16. The Receiver has previously filed ten interim fee applications,[2] all of which were approved by the Court. *See* Dkt. Nos. 153, 203, 247, 275, 293, 339, 367, 382, 413, and 416.

17. This is the Eleventh Interim Fee Application of the Receiver and his professionals.

18. 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.

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

[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.

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.

20. 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.

21. The Receiver respectfully requests that the Court enter an Order (i) approving, on an interim basis, the Receiver's fees in the amount of $22,248; Parr Brown's fees in the amount of $348,887 and out-of-pocket expenses of $2,879.51; BRG's fees in the amount of $73,078 and out-of-pocket expenses of $87.81; and the Conflict Receiver and his counsel's fees in the amount of $14,795 and out-of-pocked expenses of $889.98; 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.

22. A proposed Order is attached hereto as Exhibit E.

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

DATED this 5th day of October 2021.

**RECEIVER**

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

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

/s/ Joseph M.R. Covey
Joseph M.R. Covey
Cynthia D. Love
*Attorneys for Receiver Jonathan O. Hafen*

**BERKELEY RESEARCH GROUP**

/s/ Ray Strong
Ray Strong

**CONFLICT RECEIVER**

/s/ Wayne Klein
Wayne Klein, Conflict Receiver

**MANNING CURTIS BRADSHAW & BEDNAR**

/s/ David C. Castleberry
David. C. Castleberry
*Attorney for Conflict Receiver Wayne Klein*

**CERTIFICATE OF SERVICE**

IT IS HEREBY CERTIFIED that service of the above **ELEVENTH INTERIM FEE APPLICATION** was (1) electronically filed with the Clerk of the Court through the CM/ECF system on October 5, 2021, 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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| | |
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| John Robinson, Jr.<br>DEISS LAW PC<br>10 W 100 S STE 425<br>SALT LAKE CITY, UT 84101<br>(801)433-0226<br>jrobinson@deisslaw.com | Thomas L. Simek<br>COMMODITY FUTURES TRADING COMMISSION<br>4900 MAIN ST STE 500<br>KANSAS CITY, MO 64112<br>(816)960-7760<br>tsimek@cftc.gov |
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/s/ *Joseph M.R. Covey*
Joseph M.R. Covey

PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

July 15, 2021

Invoice: 897542
Client: 177110
Matter: 1

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Administration**

| | |
|---|---|
| Professional Services | $ 2,412.00 |
| Total Costs Advanced | $ .00 |
| **TOTAL THIS INVOICE** | **$ 2,412.00** |

Parr Brown Gee & Loveless, A Professional Corporation
Post Office Box 11019, Salt Lake City, UT 84147
T 801.532.7840 F 801.532.7750 **Tax ID 87-0307691**

Invoice: 897542 July 15, 2021
Rust Rare Coin Receiver Client: 177110
Administration Matter: 1

**PROFESSIONAL SERVICES RENDERED**

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 4/09/21 | JOH | Review email correspondence re tax filing and related matters | .20 | 72.00 |
| 4/10/21 | JOH | Review email correspondence by legal counsel concerning tax matter | .10 | 36.00 |
| 4/20/21 | JOH | Attend to tax matter; Review documents | .70 | 252.00 |
| 4/21/21 | JOH | Attention to loss number; cbe with Attorney Generals Office re same; reviewing documents; attention to clawback actions; Attention to potential settlements; Follow up re Layton property sales process; cbe with legal counsel re same; Reviewing status of claims; Reviewing list of vendor claims | 2.20 | 792.00 |
| 4/23/21 | JOH | Call with legal counsel re various matters; Attention to status of Layton property marketing efforts; Call with Attorney General's Office re various matters | .60 | 216.00 |
| 4/29/21 | JOH | Attention to tax filing; Reviewing email correspondence re receiver's report | .30 | 108.00 |
| 5/10/21 | JOH | Review incoming payment and related email correspondence | .10 | 36.00 |
| 5/12/21 | JOH | Attend to various clawback actions; Call with Attorney General's Office re various matters; Review bank statements | .90 | 324.00 |
| 5/14/21 | JOH | Attend to inquiry re taxes; Review documents; Correspond by email with legal counsel re same; Review draft pleading | 1.30 | 468.00 |
| 6/09/21 | JOH | Correspond by email with AG's Office re update; Correspond by email with legal counsel re same; Review email correspondence involving clawback claim | .30 | 108.00 |

**TOTAL PROFESSIONAL SERVICES $ 2,412.00**

**SUMMARY OF PROFESSIONAL SERVICES**

| Name | Rate | Hours | Total |
|---|---|---|---|
| Jonathan O Hafen | 360.00 | 6.70 | 2,412.00 |
| **TOTALS** | | **6.70** | **$ 2,412.00** |

**TOTAL THIS INVOICE $ 2,412.00**

PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

July 15, 2021

Invoice: 897542
Client: 177110
Matter: 1

# REMITTANCE ADVICE

**RE: Administration**

**BALANCE DUE THIS INVOICE** **$ 2,412.00**

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

To Pay by Credit Card:

__Visa __Mastercard __Discover __Amex
Credit Card # _____
Expiration Date _____/_____
Security Code # _____
Name on Account: _____
Billing Address: _____
_____
Amount: $_____
**Payments accepted by phone (801) 532-7840**

ACH Payment Instructions
ABA Routing #: 124001545
Account #: 912454114
**Please reference your invoice # 897542**

Online Payment: www.parrbrown.com

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, 2021

Invoice: 897543
Client: 177110
Matter: 2

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Assett Analysis & Recovery**

| | |
|---|---|
| Professional Services | $ 18,144.00 |
| Total Costs Advanced | $ .00 |
| **TOTAL THIS INVOICE** | **$ 18,144.00** |

Invoice: 897543 July 15, 2021
Rust Rare Coin Receiver Client: 177110
Asset Analysis & Recovery Matter: 2

**PROFESSIONAL SERVICES RENDERED**

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 4/01/21 | JOH | Review email correspondence re various matters; Attend to clawback action; Review information re tax issues | 1.10 | 396.00 |
| 4/02/21 | JOH | Call with legal counsel; Attend to clawback actions; Review documents re same; Review email correspondence re settlement payment | 1.30 | 468.00 |
| 4/05/21 | JOH | Attend to potential clawback settlement; Review correspondence; Review email correspondence from legal counsel re various matters | 1.50 | 540.00 |
| 4/06/21 | JOH | Attend to various clawback actions; Correspond by email with legal counsel re same; Review documents; Review email correspondence re settlement payment | 1.30 | 468.00 |
| 4/07/21 | JOH | Attend to clawback actions; Review email correspondence re potential settlement | 1.00 | 360.00 |
| 4/12/21 | JOH | Attend hearing on motion re Zions; Call with legal counsel; Review settlement agreements in various clawback actions; Follow up re same; Review bank statement | 1.70 | 612.00 |
| 4/13/21 | JOH | Attend to potential settlements of clawback action; Correspond by email with legal counsel re same; Call with legal counsel and consultants re same; Review order re clawback action; Follow up with Attorney Generals Office re same; Correspond by email with legal counsel re same; Attend to potential sale of Layton property; Call with legal counsel; Review documents | 2.20 | 792.00 |
| 4/15/21 | JOH | Attend to clawback claims; Follow up with legal counsel re various settlements; Review documents; Call and correspond by email with Attorney General's Office; Follow up with legal counsel re total loss number and related matters | 2.00 | 720.00 |
| 4/16/21 | JOH | Attend to potential settlements of clawback claims; Review documents; Review email correspondence; Correspond by email with legal counsel re various matters | 1.30 | 468.00 |
| 4/19/21 | JOH | Attend to various clawback actions; Review email correspondence from legal counsel re various matters; Review appraisal and related email correspondence | .90 | 324.00 |
| 4/22/21 | JOH | Attention to clawback action; Reviewing documents; Attention to sales process of Layton property | 1.20 | 432.00 |
| 4/26/21 | JOH | Attention to potential clawback settlement; Reviewing email correspondence; Email with legal counsel re quarterly report | .80 | 288.00 |
| 4/27/21 | JOH | Email with opposing counsel re potential settlement discussion; Reviewing email correspondence re discovery responses | .80 | 288.00 |
| 4/28/21 | JOH | Attention to potential clawback settlement; Email with legal counsel re same; reviewing documents; Reviewing and revising report; Email with legal counsel re same; Reviewing incoming payment and related email correspondence. | 2.00 | 720.00 |
| 5/03/21 | JOH | Attend to clawback claim; Correspond by email with legal counsel re bankruptcy issue and securing local counsel; Attend to potential sale of Layton property; Correspond by email with legal counsel re same | 1.30 | 468.00 |

PARR BROWN GEE & LOVELESS

Invoice: 897543 July 15, 2021
Rust Rare Coin Receiver Client: 177110
Asset Analysis & Recovery Matter: 2

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 5/04/21 | JOH | Attend to clawback action; Correspond by email with legal counsel re same; Correspond by email with legal counsel re employee claims; Review email correspondence re bankruptcy matter | 1.40 | 504.00 |
| 5/06/21 | JOH | Attend to various clawback actions; Follow up re status of marketing efforts of Layton property | .50 | 180.00 |
| 5/11/21 | JOH | Follow up with legal counsel re claims process; Attend to clawback action; Correspond by email with legal counsel re same; Attend to new lawsuit relating to investor losses; Correspond by email with Attorney General's Office; Attend to marketing of Layton property | 1.00 | 360.00 |
| 5/13/21 | JOH | Attend to clawback action; Review email correspondence and related document | .60 | 216.00 |
| 5/18/21 | JOH | Attend to clawback action; Correspond by email with legal counsel re potential deposition; Review email correspondence and related document re potential settlement of action; Review email correspondence and related documents concerning breach of settlement agreement | 2.20 | 792.00 |
| 5/19/21 | JOH | Attend to various clawback actions; Call with legal counsel | 1.00 | 360.00 |
| 5/20/21 | JOH | Call with legal counsel; Attend to potential depositions in clawback action; Review email correspondence from legal counsel; Review email correspondence and related document concerning status of offers on Layton property | .90 | 324.00 |
| 5/25/21 | JOH | Call with legal counsel; Attend to various clawback actions; Review email correspondence and related documents concerning settlement payments; Review bankruptcy notice | 1.60 | 576.00 |
| 5/28/21 | JOH | Follow up with legal counsel re various matters; Attend to potential clawback settlement; Further research, review, analyze, draft, revise potential sale of Layton property | 1.00 | 360.00 |
| 6/01/21 | JOH | Follow up re tax question from victim; Attend to various clawback actions; Correspond by email with legal counsel re clawback action; Correspond by email with legal counsel re upcoming depositions | 1.60 | 576.00 |
| 6/07/21 | JOH | Attend to clawback action; Review email correspondence re potential property sale | .60 | 216.00 |
| 6/08/21 | JOH | Attend to clawback actions; Follow up re status of claims process | .80 | 288.00 |
| 6/10/21 | JOH | Attend to resolution of clawback action; Correspond by email with legal counsel re same; Attend to engagement of Arizona bankruptcy counsel; Correspond by email with legal counsel re same; Review email correspondence re status of potential sale of property | 2.20 | 792.00 |
| 6/15/21 | JOH | Prepare for and participate in meetings with legal counsel re various matters, including upcoming deposition in clawback action; Review email correspondence re clawback action; Review documents | 2.40 | 864.00 |
| 6/17/21 | JOH | Meetings with legal counsel re various clawback actions; Attend to claims and claims process; Meet with legal counsel re same; Prepare for deposition in clawback action; Attend to potential settlements of clawback actions; Review documents | 5.40 | 1,944.00 |
| 6/18/21 | JOH | Attend to clawback settlement; Review email correspondence re same | .20 | 72.00 |

PARR BROWN GEE & LOVELESS

Invoice: 897543 July 15, 2021
Rust Rare Coin Receiver Client: 177110
Asset Analysis & Recovery Matter: 2

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 6/21/21 | JOH | Attend to clawback actions; Review email correspondence re same; Attend to potential sale of receivership asset | .60 | 216.00 |
| 6/22/21 | JOH | Attend to clawback actions; Attend to sale of Layton property; Review email correspondence re same | .30 | 108.00 |
| 6/23/21 | JOH | Prepare for deposition in clawback action | 1.30 | 468.00 |
| 6/24/21 | JOH | Prepare for and participate in deposition in clawback action; Attend to various other clawback actions; Review documents and email correspondence; Review settlement agreement; Correspond by email with legal counsel re same | 4.40 | 1,584.00 |

**TOTAL PROFESSIONAL SERVICES** **$ 18,144.00**

**SUMMARY OF PROFESSIONAL SERVICES**

| Name | Rate | Hours | Total |
|---|---|---|---|
| Jonathan O Hafen | 360.00 | 50.40 | 18,144.00 |
| **TOTALS** | | **50.40** | **$ 18,144.00** |

**TOTAL THIS INVOICE** **$ 18,144.00**

PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

July 15, 2021

Invoice: 897543
Client: 177110
Matter: 2

# REMITTANCE ADVICE

**RE: Assett Analysis & Recovery**

**BALANCE DUE THIS INVOICE** **$ 18,144.00**

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

To Pay by Credit Card:

__Visa __Mastercard __Discover __Amex
Credit Card # _____
Expiration Date _____/_____
Security Code # _____
Name on Account: _____
Billing Address: _____
_____
Amount: $_____
**Payments accepted by phone (801) 532-7840**

ACH Payment Instructions
ABA Routing #: 124001545
Account #: 912454114
**Please reference your invoice # 897543**

Online Payment: www.parrbrown.com

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, 2021

Invoice: 898477
Client: 177110
Matter: 3

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Disposition of Assets**

| | |
|---|---|
| Professional Services | $ 1,692.00 |
| Total Costs Advanced | $ .00 |
| **TOTAL THIS INVOICE** | **$ 1,692.00** |

Parr Brown Gee & Loveless, A Professional Corporation
Post Office Box 11019, Salt Lake City, UT 84147
T 801.532.7840 F 801.532.7750 Tax ID 87-0307691

PARR BROWN GEE & LOVELESS

Invoice: 898477 July 15, 2021
Rust Rare Coin Receiver Client: 177110
Disposition of Assets Matter: 3

**PROFESSIONAL SERVICES RENDERED**

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 5/05/21 | JOH | Attend to Layton property sale; Correspond by email with realtor re same; Correspond by email with legal counsel re same; Correspond by email with legal counsel re claims analysis; Follow up re same; Attend to payment from Zions; Correspond by email with legal counsel re same | .90 | 324.00 |
| 5/07/21 | JOH | Attend to potential sale of Layton property; Review email correspondence from legal counsel re various matters | .40 | 144.00 |
| 5/08/21 | JOH | Review email correspondence re status of sale of Layton property | .10 | 36.00 |
| 5/17/21 | JOH | Correspond by email with legal counsel re pleading; Attend to marketing of Layton property | .20 | 72.00 |
| 5/21/21 | JOH | Review documents; Attend to potential sale of Layton property; Review email correspondence and related documents from legal counsel | 1.00 | 360.00 |
| 5/24/21 | JOH | Further attend to potential sale of Layton property | .20 | 72.00 |
| 5/26/21 | JOH | Call with legal counsel re various matters; Follow up re offer on Layton property; Correspond by email with realtor re same; Review document re same | 1.00 | 360.00 |
| 5/29/21 | JOH | Review email correspondence from realtor | .10 | 36.00 |
| 6/04/21 | JOH | Attend to potential property sale; Review related email correspondence | .20 | 72.00 |
| 6/11/21 | JOH | Attend to sale of asset; Correspond by email with legal counsel re same; Prepare for upcoming deposition; Correspond by email with legal counsel re same; Attend to property sale | .60 | 216.00 |

**TOTAL PROFESSIONAL SERVICES** **$ 1,692.00**

**SUMMARY OF PROFESSIONAL SERVICES**

| Name | Rate | Hours | Total |
|---|---|---|---|
| Jonathan O Hafen | 360.00 | 4.70 | 1,692.00 |
| **TOTALS** | | **4.70** | **$ 1,692.00** |

**TOTAL THIS INVOICE** **$ 1,692.00**

PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

July 15, 2021

Invoice: 898477
Client: 177110
Matter: 3

# REMITTANCE ADVICE

**RE: Disposition of Assets**

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Please return this advice with payment to:

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ABA #: 021000021
Parr Brown Gee & Loveless
Account #: 912454114

To Pay by Credit Card:

__Visa __Mastercard __Discover __Amex
Credit Card # _____
Expiration Date _____/_____
Security Code # _____
Name on Account: _____
Billing Address: _____
_____
Amount: $_____
**Payments accepted by phone (801) 532-7840**

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**Please reference your invoice # 898477**

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Payable Upon Receipt

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PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

August 16, 2021

Invoice: 897538
Client: 176430
Matter: 1

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Administration of Receivership Estate**

| | |
|---|---|
| Professional Services | $ 9,955.00 |
| Total Costs Advanced | $ 929.27 |
| **TOTAL THIS INVOICE** | **$ 10,884.27** |

Invoice: 897538 August 16, 2021
Rust Rare Coin Receivership Client: 176430
Administration of Receivership Estate Matter: 1

**PROFESSIONAL SERVICES RENDERED**

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 4/01/21 | WOP | Correspond with Daniel re quarterly status report; Review docket | 1.60 | 368.00 |
| 4/02/21 | WOP | Meet with various attorneys re updates for the tenth quarterly report; Review and revise settlement agreement; Begin draft of tenth quarterly report | 3.30 | 759.00 |
| 4/05/21 | JMC | Correspond with Cynthia Love and others re consignment issue for Rob Thurston | .20 | 67.00 |
| 4/05/21 | CMM | Draft email to Midland national about surrender of insurance policies; Edit letters to opposing about supplemental disclosure and claw back of produced documents | .60 | 135.00 |
| 4/06/21 | WOP | Revise tenth quarterly report | 2.70 | 621.00 |
| 4/07/21 | WOP | Continue draft of quarterly status report; Discuss the same with various attorneys for status updates | 3.40 | 782.00 |
| 4/12/21 | JMC | Correspond with Gary Longmore and Ray Strong re amended tax return and related issues; Review and analyze amended return | 3.10 | 1,038.50 |
| 4/16/21 | WOP | Continue draft of status report; Call with Cynthia re same; Call with Joe re same; Call with Claire re same | 2.60 | 598.00 |
| 4/19/21 | WOP | Continue draft of status report | 1.80 | 414.00 |
| 4/20/21 | WOP | Compile exhibits for quarterly status report; Meet with Kathy re same; Complete draft of report; Correspond with Joe re same | 2.30 | 529.00 |
| 4/20/21 | WOP | No Charge - Begin review of attorney time sheets for tenth fee application | 1.80 | N/C |
| 4/21/21 | JMC | Correspond with Daniel Zarkou re insurance on clawback target's property; Review and analyze amended tax return | .40 | 134.00 |
| 4/22/21 | WOP | No Charge - Review attorney time sheets for fee application | 1.30 | N/C |
| 4/23/21 | WOP | No Charge - Review attorney time sheets for fee application; Correspond with various attorneys re same | 1.20 | N/C |
| 4/26/21 | JMC | Review and revise tenth quarterly report; Correspond with Jon Hafen re the same | .90 | 301.50 |
| 4/27/21 | JMC | Finalize tenth quarterly report; Correspond with Jon Hafen and Walter Peterson re the same | 1.00 | 335.00 |
| 4/28/21 | JMC | Correspond with Walter Peterson re tenth quarterly report filing; Correspond with Mark Pugsley re amended tax return | .90 | 301.50 |
| 4/28/21 | WOP | No Charge - Review docket report and related cases in preparation for fee application | 1.80 | N/C |
| 4/29/21 | WOP | Make final revisions to status report; Correspond with Daniel and Lor re filing the same and sending emails | .80 | 184.00 |
| 4/29/21 | WOP | No Charge - Continue review of attorney time sheets for fee application | 2.20 | N/C |
| 4/30/21 | JMC | Correspond with Ray Strong re tax return issues | .30 | 100.50 |
| 5/03/21 | WOP | No Charge - Complete review of time sheets; Correspond with Caralee re same; Review BRG time sheets for necessary redactions; Begin draft of fee application | 4.60 | N/C |

PARR BROWN GEE & LOVELESS

Invoice: 897538 August 16, 2021
Rust Rare Coin Receivership Client: 176430
Administration of Receivership Estate Matter: 1

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 5/04/21 | JMC | No Charge - Review and revise Ninth Fee Application; Correspond with Jon Hafen re the same | 1.50 | N/C |
| 5/05/21 | WOP | Review records related to sale of precious metals; Correspond with Daniel and Claire re same | 1.40 | 322.00 |
| 5/06/21 | JMC | Review and locate all transaction ion 2020 for tax return; Correspond with Jeff Shaw re the same | 1.90 | 636.50 |
| 5/06/21 | WOP | Review documents related to metal transactions; Correspond with Joe and BRG re same; | 1.80 | 414.00 |
| 5/07/21 | WOP | Review additional documents related to metal transactions; Cross reference with BRG statements; Correspond with Daniel and Robert Olson re statements | 2.40 | 552.00 |
| 5/10/21 | JMC | No Charge - Correspond with Jon Hafen re fee application | .10 | N/C |
| 5/10/21 | JMC | Review checks received on insurance policies | .10 | 33.50 |
| 5/11/21 | JMC | No Charge - Review and finalize fee application; Correspond with Jon Hafen and the government re the same | .80 | N/C |
| 5/14/21 | JMC | Correspond with Jon Hafen and Ray Strong re tax issues | .30 | 100.50 |
| 5/18/21 | WOP | No Charge - Review docket; Correspond with various attorneys re status updates; Begin draft of tenth fee application | 3.40 | N/C |
| 5/21/21 | WOP | No Charge - Continue draft of fee application; Correspond with BRG re same | 1.70 | N/C |
| 5/24/21 | KBT | Legal research re ERISA anti-alienation issue re KAK (Kirkham) defined benefit plan | 2.20 | 1,001.00 |
| 5/24/21 | WOP | No Charge - Correspond with BRG and conflict receiver re fees for tenth fee application; Review ninth fee application to ensure fees were calculated correctly | 1.80 | N/C |
| 5/24/21 | WOP | No Charge - Continue draft of fee application | 1.20 | N/C |
| 5/26/21 | KBT | Telephone conference with Roger Burge re ERISA anti-alienation issue re KAK (Kirkham) defined benefit plan; Analyze ERISA anti-alienation issue re KAK pension plan | .50 | 227.50 |
| 5/26/21 | JMC | No Charge - Correspond with the government and Walter Peterson re fee application | .40 | N/C |
| 5/26/21 | WOP | No Charge - Call with Joe re status of fee application; Correspond with Kathy re same; Review conflict receiver time sheets; Correspond with conflict receiver re same | .80 | N/C |
| 5/27/21 | JMC | No Charge - Finalize ninth fee application; Correspond with government re the same; Coordinate filing and service of the same | .20 | N/C |
| 5/28/21 | WOP | No Charge - Continue draft of fee application; Create all exhibits | 3.80 | N/C |
| 6/01/21 | WOP | No Charge - Complete draft of fee application; Perform third review of attorney time sheets to ensure no errors were made; Draft proposed order | 6.10 | N/C |
| 6/02/21 | JMC | No Charge - Correspond with Kathleen Bates re fee application and related issues | .50 | N/C |

PARR BROWN GEE & LOVELESS

Invoice: 897538 August 16, 2021
Rust Rare Coin Receivership Client: 176430
Administration of Receivership Estate Matter: 1

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 6/02/21 | WOP | No Charge - Review docket; Correspond with Joe and Kathy re approval of fee application | .20 | N/C |
| 6/04/21 | JMC | No Charge - Review and finalize ninth and tenth fee application issues; Correspond with Ray Strong, Walter Peterson, Wayne Klein and others re the same | 1.30 | N/C |
| 6/07/21 | JMC | No Charge - Revise ninth and tenth fee applications; Correspond with Kathy Bates re the same | .40 | N/C |
| 6/15/21 | JMC | No Charge - Review and revise tenth fee application; Correspond with Jon Hafen re the same | .70 | N/C |
| 6/21/21 | JMC | No Charge - Correspond with Jon Hafen re fee application | .20 | N/C |
| 6/24/21 | JMC | No Charge - Review and finalize tenth fee application; Correspond with Jon Hafen and the government re the same | .70 | N/C |

**TOTAL PROFESSIONAL SERVICES** **$ 9,955.00**

**SUMMARY OF PROFESSIONAL SERVICES**

| Name | Rate | Hours | Total |
|---|---|---|---|
| Kenneth B Tillou | 455.00 | 2.70 | 1,228.50 |
| Joseph M R Covey | 335.00 | 9.10 | 3,048.50 |
| Walter O Peterson | 230.00 | 24.10 | 5,543.00 |
| Claire M McGuire | 225.00 | .60 | 135.00 |
| **TOTALS** | | **36.50** | **$ 9,955.00** |

**COSTS ADVANCED**

| Date | Description | Amount |
|---|---|---|
| 2/07/21 | PACER Electronic Court Records | 9.40 |
| 4/21/21 | Grasshopper.com | 19.72 |
| 4/29/21 | PACER Electronic Court Records | 4.90 |
| 5/21/21 | Grasshopper.com | 19.72 |
| | Copies - B & W | 13.20 |
| 6/15/21 | Gourmandise - lunches for deposition preparation meeting | 68.84 |
| 6/21/21 | Grasshopper.com | 19.71 |
| 6/23/21 | DepomaxMerit Litigation Services - Daniel Dearden Eric Dearden, and Sandra Dearden deposition transcripts | 773.78 |

**TOTAL COSTS ADVANCED** **$ 929.27**

**TOTAL THIS INVOICE** **$ 10,884.27**

PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

August 16, 2021

Invoice: 897538
Client: 176430
Matter: 1

# REMITTANCE ADVICE

**RE: Administration of Receivership Estate**

**BALANCE DUE THIS INVOICE** **$ 10,884.27**

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

To Pay by Credit Card:

__Visa __Mastercard __Discover __Amex
Credit Card # _____
Expiration Date _____/_____
Security Code # _____
Name on Account: _____
Billing Address: _____
_____
Amount: $_____
**Payments accepted by phone (801) 532-7840**

ACH Payment Instructions
ABA Routing #: 124001545
Account #: 912454114
**Please reference your invoice # 897538**

Online Payment: www.parrbrown.com

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, 2021

Invoice: 897539
Client: 176430
Matter: 2

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Asset Analysis & Recovery**

| | |
|---|---|
| Professional Services | $ 295,153.50 |
| Total Costs Advanced | $ 1,944.77 |
| **TOTAL THIS INVOICE** | **$ 297,098.27** |

Invoice: 897539 July 15, 2021
Rust Rare Coin Receivership Client: 176430
Asset Analysis & Recovery Matter: 2

**PROFESSIONAL SERVICES RENDERED**

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 4/01/21 | JMC | Correspond with Cynthia Love re clawback settlements | .30 | 100.50 |
| 4/01/21 | DEB | Research motion to dismiss; Attend to procedural motions; Prepare summary of investments and withdrawals for negotiations | 3.80 | 1,235.00 |
| 4/01/21 | MJB | (Hafen v. Howell) Review counteroffer (0.3); Correspond with Joseph Covey (0.1) | .40 | 126.00 |
| 4/01/21 | CDL | Evaluate legal standard in claw back action; Review settlement proposal and provide comments re same | .80 | 200.00 |
| 4/02/21 | JMC | Review and analyze Oberhansly settlement counter-offer; Correspond with Ray Strong, Jonathan Hafen and Cynthia Love re counter-offer; Begin drafting response; Correspond with Dan Barnett re other clawback offers | 1.80 | 603.00 |
| 4/02/21 | DEB | Prepare summary of investments and withdrawals for negotiation; Finalize and file stipulation for scheduling order and proposed scheduling order | 2.50 | 812.50 |
| 4/02/21 | CDL | Attend various issues re claw backs; Telephone conference with Claire McGuire; Conference re Oberhansly settlement | 6.30 | 1,575.00 |
| 4/02/21 | DPMP | Research cases identified by opposing counsel to support equitable defenses | 8.20 | 2,050.00 |
| 4/02/21 | CMM | Draft legal analysis for investor group; Compile evidence including Brinks statements; Analyze investor group claims and analysis provided by BRG | 5.20 | 1,170.00 |
| 4/03/21 | RMB | Communicate with Miriam Martinez re settlement meeting; Communicate with Robb Jones re Dolores Batalla claw-back claim and settlement; Communicate with Brandon Smith re Guadalupe Valencia claw-back; Review status on Kirkham and Nielson claw-backs | 2.20 | 715.00 |
| 4/05/21 | JMC | Review and finalize counter-offer for Oberhansly; Correspond with Mark Pugsley re the same; Review and analyze clawback settlement; Correspond with Matthew Ball re the same | 3.20 | 1,072.00 |
| 4/05/21 | DEB | Review correspondence and respond to defendant; Review correspondence re investments and disbursements | 1.50 | 487.50 |
| 4/05/21 | MTH | Correspond with opposing counsel re matter; Review and respond to correspondence from Claire McGuire re case analysis | .20 | 64.00 |
| 4/05/21 | CDL | Review and revise settlement communication in claw back; Telephone conference with Claire McGuire; Legal research re same | 2.40 | 600.00 |
| 4/05/21 | DPMP | Telephone conversation with opposing counsel re equitable defenses; Research cases undermining defenses; Review documents related to defenses | 8.30 | 2,075.00 |
| 4/05/21 | CMM | Attorney conference with Cynthia Love about investor analysis; Draft new response to investor settlement offer; Draft email detailing the same to Michael Hoppe | 3.60 | 810.00 |
| 4/05/21 | CMM | Call with appraiser about water shares; Research joinder issue in Taylor claw back | 2.60 | 585.00 |

PARR BROWN GEE & LOVELESS

Invoice: 897539 July 15, 2021
Rust Rare Coin Receivership Client: 176430
Asset Analysis & Recovery Matter: 2

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 4/05/21 | DZ | Telephone conference with Claire McGuire re supplemental productions and Midland National Life Insurance letter; Edit Midland National Life Insurance letter and send to Midland; Review email from Joe Covey re consignor questions | .80 | 120.00 |
| 4/06/21 | JMC | Correspond with Matt Ball re Howell new winner settlement offer and litigation strategy; Review and analyze offer | .50 | 167.50 |
| 4/06/21 | DEB | Correspondence with defendants re settlement negotiations; Review documents re same | .80 | 260.00 |
| 4/06/21 | RMB | Review expert reports for Ray Strong and Jeff Shaw; Communicate with Jeff Shaw re preparation of Jeff Shaw expert report | 1.20 | 390.00 |
| 4/06/21 | MTH | Review and evaluate information and analysis re claw back action; Correspond with Claire McGuire re claw back action; Review and respond to correspondence from Claire McGuire re case; Correspond with opposing counsel re claw back action | .90 | 288.00 |
| 4/06/21 | MJB | (Hafen v. Howell) Conference with Joseph Covey (0.3) | .30 | 94.50 |
| 4/06/21 | MJB | (Hafen v. Goodsell) Telephone conference with Tonya Wright (0.1) | .10 | 31.50 |
| 4/06/21 | CDL | Attend various issues re claw backs; review proposed settlement framework | 1.30 | 325.00 |
| 4/06/21 | DPMP | Research cases undermining defenses; Research Idaho choice of law cases; Research Idaho enforceability of judgments; Research market for Idaho businesses | 8.30 | 2,075.00 |
| 4/06/21 | DZ | Coordinate with Rodger Burge re the Strong expert report; Download bates numbered Strong expert report and create a share link for the same; Send to Rodger Burge a link to the expert report | .70 | 105.00 |
| 4/07/21 | JMC | Correspond with Mark Pugsley re Oberhansly settlement; Review and analyze counter-offer; Correspond with Ray Strong and others re the same | 1.40 | 469.00 |
| 4/07/21 | DEB | Correspondence with defendants re settlement negotiations; Review documents re same | .70 | 227.50 |
| 4/07/21 | RMB | Review and produce expert reports of Jeff Shaw and Ray Strong in Kennedy-Barnes claw-back action | .80 | 260.00 |
| 4/07/21 | MTH | Correspond with claw back respondent | .20 | 64.00 |
| 4/07/21 | MJB | (Hafen v. Howell) Correspond with Patrick Johnson (0.1); Draft discovery request (0.1); Correspond with Joe Covey (0.2) | .40 | 126.00 |
| 4/07/21 | DPMP | Telephone conversation with opposing counsel re enforceability of judgment; Review documents related to defenses; Research alternatives to enforce judgment; Telephone conversation with opposing counsel re settlement | 8.50 | 2,125.00 |
| 4/08/21 | DEB | Communications with defendants re settlement negotiations; Review documents and correspondence re same | 3.30 | 1,072.50 |
| 4/08/21 | DZ | Edit supplemental production letters per Claire McGuire's request and send them to her for her review; Update important deadlines for claw back and send to BRG | .70 | 105.00 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 4/09/21 | DEB | Review correspondence and financial documentation re settlement negotiation; Review correspondence and documentation re metals received and receipts | 2.90 | 942.50 |
| 4/09/21 | MTH | Review and respond to correspondence from claw back defendant re claims | .40 | 128.00 |
| 4/09/21 | MJB | (Hafen v. Goodsell) Correspond with Tonya Wright (0.1); Review financial documents (1.0) | 1.10 | 346.50 |
| 4/09/21 | CMM | Research issue of estate joinder in Taylor claw back; Draft initial structure of response to motion to dismiss for supposed rule 19 violation | 4.80 | 1,080.00 |
| 4/09/21 | CMM | Review Michael Hoppe comments on settlement; Restructure and draft settlement offer to investor | 3.60 | 810.00 |
| 4/12/21 | DEB | Attend to settlement agreements; Communications with counsel re defendants and bankruptcy; Review documents and correspondence | .90 | 292.50 |
| 4/12/21 | MTH | Review settlement agreement and confession of judgment; Review settlement agreement and issues re case; Review and revise demand letter re large claw back action | 2.60 | 832.00 |
| 4/12/21 | MJB | (Hafen v. Howell) Correspond with Joe Covey (0.1) | .10 | 31.50 |
| 4/12/21 | CDL | Prepare for and attend hearing re Leland Jacobson matter | 1.10 | 275.00 |
| 4/12/21 | DPMP | Prepare documents in response to request for documents from opposing counsel; Review expert report to be produced with same; Review prior motions to identify examples to provide copies to opposing counsel; Research additional documents that may be relevant to settlement discussions | 7.90 | 1,975.00 |
| 4/12/21 | WOP | Review loan summary for investor; Research UCC law re same | 4.20 | 966.00 |
| 4/12/21 | CMM | Draft final version of investor settlement and send to Mike Hoppe | 1.50 | 337.50 |
| 4/12/21 | CMM | Research whether rule 19(a) and (b) requires the joinder of an initial transferee if that transferee no longer holds any property; Review case law cited in motion to dismiss in Taylor claw back | 5.60 | 1,260.00 |
| 4/13/21 | RMB | Analyze claw-back action for remaining claw-back group and prepare for conference with Jeff Shaw; Conference with Jeff Shaw | 1.70 | 552.50 |
| 4/13/21 | MTH | Review and revise demand/settlement letter to large investor; Correspond with Claire McGuire re revisions to demand letter; Review correspondence from opposing counsel re settlement payment; Correspond with Joe Covey re same; Review and respond to correspondence from opposing counsel; Telephone conference with Joe Covey re case | 1.60 | 512.00 |
| 4/13/21 | MJB | (Hafen v. Goodsell) Review financial records (0.6); Correspond with Joseph Covey (0.1) | .70 | 220.50 |
| 4/13/21 | JAB | Review court order re turnover of $1.6 million | .30 | 85.50 |
| 4/13/21 | CDL | Conference re potential settlement | .80 | 200.00 |
| 4/13/21 | DPMP | Telephone conversation with opposing counsel; Identify additional documents relevant to settlement discussions; Review cases identified by opposing counsel | 7.80 | 1,950.00 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 4/13/21 | CMM | Review final draft of investor settlement from Hoppe; Draft final edits based on comments; Research date of uniform fraudulent transaction update in Utah and any changes applicable to the Taylor claw back; Draft relation back section of memorandum in opposition of motion to dismiss | 6.40 | 1,440.00 |
| 4/14/21 | JMC | Correspond with Michael Hoppe re clawback matters | .20 | 67.00 |
| 4/14/21 | RMB | Prepare for Dearden group depositions; Communicate with Robb Jones and Brett Anderson re case schedule | 1.40 | 455.00 |
| 4/14/21 | MTH | Review and revise draft demand letter in claw back action; Correspond with Claire McGuire re case | .60 | 192.00 |
| 4/14/21 | DPMP | Telephone conversation with opposing counsel re possible summary disposition of case without requiring extensive discovery; Draft proposed motion re same; Review documents re claw back defendant's claim; Review flow of funds; Research cases on intermediate purchasers | 7.30 | 1,825.00 |
| 4/15/21 | JMC | Correspond with Michael Hoppe re large net winner claim and potential lawsuit; Correspond with Mark Pugsley re Oberhansly settlement agreement | 3.10 | 1,038.50 |
| 4/15/21 | DEB | Attend to settlement agreements; Review documents and correspondence re investments and disbursements in clawback matters | 3.90 | 1,267.50 |
| 4/15/21 | RMB | Prepare for meeting with Cynthia Love and Jeff Shaw; Meet with Cynthia Love and Jeff Shaw on potential claw-back claims and litigation strategy | 1.40 | 455.00 |
| 4/15/21 | MTH | Review materials re case; Correspond with Claire McGuire re claw back action; Telephone conference with Joe Covey re case; Correspond with Jon Hafen re claw back action and proposed settlement offer; Review and respond to correspondence from Jon Hafen re case; Correspond with Toni Gard-Moore re letter | 1.10 | 352.00 |
| 4/15/21 | CDL | Attend various issues re claw backs | 2.30 | 575.00 |
| 4/15/21 | EWB | Redact sensitive information from produced documents | 5.60 | 1,204.00 |
| 4/15/21 | CMM | Review and finalize investor settlement; Email Michael Hoppe about the same; Email Jeff Shaw about Bary Jones analysis | .20 | 45.00 |
| 4/15/21 | DZ | Email Jeff Balls re settlement agreement for claw back case; Search for settlement agreements on internal database; Email claw back attorneys re settlement agreement payments | .30 | 45.00 |
| 4/16/21 | JMC | Correspond with Matt Ball re Howell litigation and related issues | .50 | 167.50 |
| 4/16/21 | RMB | Revise stipulated motion to amend scheduling order; Communicate with Robb Jones and Brett Anderson re Dearden group case deadlines; Prepare for Dearden group depositions; Communicate with Tony Napolitano re status of potential claw-back action | 1.80 | 585.00 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 4/16/21 | MTH | Revise letter response to claw back respondent; Correspond with legal team re declaration for response; Correspond with Toni Gard-Moore re letter response; Review and respond to correspondence re response; Correspond with opposing counsel re response; Review and respond to correspondence from opposing counsel re case | .70 | 224.00 |
| 4/16/21 | MJB | (Hafen v. Howell) Correspond with Joe Covey (0.1); Correspond with Patrick Johnson (0.1); Correspond with Daniel Zarkou (0.1) | .30 | 94.50 |
| 4/16/21 | CDL | Attend various issues re claw backs | .60 | 150.00 |
| 4/16/21 | EWB | Redact sensitive information from produced documents | 4.50 | 967.50 |
| 4/16/21 | DZ | Review email from Matt Ball re potential Receivership asset; Coordinate with Rodger Burge and Jonathan Hafen re amendment to RRC claw back settlement agreement | .30 | 45.00 |
| 4/19/21 | JMC | Correspond with Cynthia Love, Mark Pugsley and others re Oberhansly settlement, amended tax return and related issues | .50 | 167.50 |
| 4/19/21 | DEB | Review bankruptcy fillings and schedules; Draft and file notice of filing of bankruptcy; Telephone conference with counsel re offsets and payments | 1.80 | 585.00 |
| 4/19/21 | RMB | Communicate with Brett Anderson re Dearden depositions and case schedule; Analyze discovery and scheduling issues; Review settlement offer from Josh Lee for Kirkham claim | 1.10 | 357.50 |
| 4/19/21 | MTH | Review correspondence re claw back action; Correspond with Jon Hafen re same | .20 | 64.00 |
| 4/19/21 | MJB | (Hafen v. Howell) Conference with Daniel Zarkou (0.1) | .10 | 31.50 |
| 4/19/21 | DPMP | Research potential bankruptcy defenses raised by opposing counsel; Research fraud exceptions to bankruptcy; Research assets owned by claw back defendant that could satisfy a judgment | 5.00 | 1,250.00 |
| 4/19/21 | EWB | Redact sensitive information from produced documents | 2.90 | 623.50 |
| 4/19/21 | CMM | Call with Jeff Shaw about Bary Jones analysis; Research spot price of silver and review charts sent by Jeff Shaw | 3.80 | 855.00 |
| 4/19/21 | DZ | Coordinate with Matt Balls re claw back case insurance; Telephone conferences with insurance agencies re insurance-related questions; Coordinate with Andrea Coates re claw back settlement agreement; Upload settlement agreement to internal network and update information related to claw back settlements | 1.60 | 240.00 |
| 4/20/21 | DEB | Review documents and correspondence re clawback claims; Communications re agreements and offsets | 1.50 | 487.50 |
| 4/20/21 | RMB | Review status of Nielson, Kirkham, Andreini, Rico, and Dearden claw-back actions and plan further litigation and settlement strategy | 3.90 | 1,267.50 |
| 4/20/21 | MTH | Review correspondence from opposing counsel re case; Correspond with Claire McGuire re case; Correspond with opposing counsel re case; Review and respond to correspondence from opposing counsel re case; Correspond with Joe Covey re case; Correspond with opposing counsel re claw back cases; Correspond with Jon Hafen re settlement payment | .50 | 160.00 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 4/20/21 | MJB | (Hafen v. Howell) Correspond with Patrick Johnson (0.1) | .10 | 31.50 |
| 4/20/21 | MJB | (Hafen v. Goodsell) Correspond with Joe Covey and Cynthia Love (0.2) | .20 | 63.00 |
| 4/20/21 | JAB | Email Jeff Shaw re meeting with Ken Wade | .30 | 85.50 |
| 4/20/21 | CDL | Attend issues re claw backs | .60 | 150.00 |
| 4/20/21 | CDL | Attend various issues re claw backs; review proposed settlement agreements | 4.90 | 1,225.00 |
| 4/20/21 | EWB | Redact sensitive information from produced documents | 1.20 | 258.00 |
| 4/20/21 | WOP | Meet with Claire re investor documents; Review loan documents re same investor | 1.60 | 368.00 |
| 4/20/21 | CMM | Research joinder of an estate for Taylor claw back; Draft response to motion to dismiss in the same matter | 4.20 | 945.00 |
| 4/21/21 | JMC | Review clawback action with Dan Barnett; Correspond with Matt Boley re Howell litigation | .30 | 100.50 |
| 4/21/21 | RMB | Meet with Miriam Martinez and Luisa Marquez re settlement; Evaluate Miriam Martinez and Luisa Marquez claw-back claim; Communicate with Brett Anderson re discovery issues and Dearden depositions; Analyze service and default issues for Mike Johnson and Peggy Hennings; Evaluate Gary Nielson claim and communicate with Jeff Colemere re status of settlement options; Evaluate potential summary judgment motion for Kennedy-Barnes claw-back claim | 7.00 | 2,275.00 |
| 4/21/21 | MTH | Instruct Toni Gard-Moore re confession of judgment; Correspond with opposing counsel re confession of judgment; Review materials in preparation for call with opposing counsel; Telephone conference with opposing counsel and Claire McGuire re claw back action; Review tolling agreement and respond to correspondence from Claire McGuire re claw back action | 1.40 | 448.00 |
| 4/21/21 | JAB | Review documents re Ken Wade | 2.50 | 712.50 |
| 4/21/21 | EWB | Redact sensitive information from produced documents | .70 | 150.50 |
| 4/21/21 | CMM | Draft motion to approve settlement with Lucile Rust Johnson; Draft proposed order re the same; Call with Michael Hoppe and James Tracy about potential investor settlement; Pull tolling agreement related to the same; Pull and review investor tolling agreement; Send opposing counsel motion to approve settlement and proposed order for comments or objections in investor claw back action | 2.60 | 585.00 |
| 4/21/21 | DZ | Coordinate with Matt Ball re updates on securing Receivership entity; Coordinate with Rodger Burge re certificates of service for summonses in claw back case; Coordinate with Cheryl Healy re same | .80 | 120.00 |
| 4/22/21 | JMC | Draft Oberhansly settlement agreement; Review and revise various documents related to settlement | 3.80 | 1,273.00 |
| 4/22/21 | DEB | Review case files; Follow up with clawback defendants | 3.80 | 1,235.00 |
| 4/22/21 | RMB | Prepare and finalize stipulated motion to stay case for Andreini claw-back action; Communicate with Mark Pugsley re motion to stay case; Prepare motion for entry of default for Adrian Alvarez; Further evaluate claims and strategy in Andreini claw-back | 4.30 | 1,397.50 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 4/22/21 | MTH | Review correspondence from Joe Covey; Provide case analysis and strategy to Joe Covey re claw back action | .30 | 96.00 |
| 4/22/21 | MJB | Draft amended scheduling order (0.2); Correspond with Patrick Johnson (0.1) | .30 | 94.50 |
| 4/22/21 | CDL | Attend various issues re claw backs; finalize settlement agreement; review potential settlement terms | 7.30 | 1,825.00 |
| 4/22/21 | DPMP | Telephone conversation with opposing counsel; Revise settlement plan for case to reflect same; Draft proposed motion for summary disposition | 5.10 | 1,275.00 |
| 4/22/21 | CMM | Finalize motion to approve settlement with Rust Johnson; Communicate re same with opposing counsel | .70 | 157.50 |
| 4/22/21 | DZ | Coordinate with Claire McGuire re claw back deadlines related to claw back case; Telephone conference with insurance agency re options for securing Receivership Defendant asset | 1.00 | 150.00 |
| 4/23/21 | JMC | Review and revise Oberhansly draft settlement agreement | .50 | 167.50 |
| 4/23/21 | DEB | Review case files; Follow up with clawback defendants and counsel for defendants; Review expert report | 3.50 | 1,137.50 |
| 4/23/21 | RMB | Teleconference with Miriam Martinez re settlement; Prepare dismissal pleadings for Augustin Rico; Prepare dismissal papers for Kliff Bare; Evaluate settlement strategy for Miriam Martinez; Analyze default judgment and service issues for Estate of Mary LaJean Dearden; Review and analyze investment documentation for Guadalupe Valencia | 3.50 | 1,137.50 |
| 4/23/21 | CDL | Attend various issues re claw backs | 2.40 | 600.00 |
| 4/23/21 | WOP | Redaction project | 3.60 | 828.00 |
| 4/23/21 | CMM | Research relation back in the context of addition of a party in the context of a rule 19(b) motion to dismiss for the Taylor claw back | 3.60 | 810.00 |
| 4/23/21 | DZ | Update claw back deadlines for Rodger Burge claw back group; Upload recent Court filings to website and prepare for email | .70 | 105.00 |
| 4/26/21 | DEB | Communications with clawback defendants; Review claims and backup re clawback offsets; Review defendants' expert opinion report | 4.90 | 1,592.50 |
| 4/26/21 | RMB | Analyze default judgment issues for Dearden and Rico groups | .40 | 130.00 |
| 4/26/21 | MJB | (Hafen v. Howell) Correspond with Patrick Johnson (0.1); Revise scheduling order (0.1) | .20 | 63.00 |
| 4/26/21 | WOP | Review comments to quarterly status report; Redact sensitive information for pro se litigants | 6.20 | 1,426.00 |
| 4/26/21 | DZ | Email Matt Ball re alternatives related to possible Receivership defendant asset; Send BRG a claw back settlement agreement | .40 | 60.00 |
| 4/27/21 | JMC | Draft settlement agreement with Oberhansly; Review and revise amended tax return; Correspond with Mark Pugsley re the same | 1.50 | 502.50 |
| 4/27/21 | DEB | Communications with clawback defendants; Review claims and backup re clawback offsets; Review defendants' expert opinion report | 1.80 | 585.00 |
| 4/27/21 | DPMP | Research cases to assist with proposed request for summary disposition and revise same | 8.00 | 2,000.00 |
| 4/27/21 | EWB | Redact sensitive information from produced documents | 2.00 | 430.00 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 4/27/21 | WOP | Redaction project | 4.20 | 966.00 |
| 4/28/21 | DEB | Telephone conference with clawback defendants; Follow-up communications with clawback defendants; Review expert opinion reports; Review appraisal report; Review claims and backup re clawback offsets | 4.70 | 1,527.50 |
| 4/28/21 | DPMP | Research out-of-jurisdiction cases relevant to settlement discussions with claw back defendants | 6.50 | 1,625.00 |
| 4/28/21 | WOP | Redaction project | 4.20 | 966.00 |
| 4/28/21 | CMM | Research bankruptcy code cited in 10th circuit case cited in motion to dismiss; Research motion to dismiss procedural posture for rule 19(b) motions to dismiss and what facts are properly considered; Draft opposition to motion to dismiss in Taylor claw back action | 6.10 | 1,372.50 |
| 4/29/21 | JMC | Review and revise amended Oberhansly tax return and related documents; Correspond with Cynthia Love, Ray Strong and Gary Longmore re the same | 2.20 | 737.00 |
| 4/29/21 | DEB | Conferences with Cynthia Love, Claire McGuire, and Jeff Shaw re motions and expert opinion reports; Review claims and backup re clawback offsets | 4.30 | 1,397.50 |
| 4/29/21 | CDL | Conference re claw back action; attend various issues re claw backs; | 5.20 | 1,300.00 |
| 4/29/21 | EWB | Redact sensitive information from produced documents | .70 | 150.50 |
| 4/29/21 | WOP | Review payments made in connection with artist's agreement; Review corresponding agreement; Redaction project | 4.80 | 1,104.00 |
| 4/29/21 | CMM | Draft memorandum in opposition of motion to dismiss for failure to join an indispensable party in Taylor claw back action | 9.10 | 2,047.50 |
| 4/29/21 | DZ | Coordinate with Amanda Bradley re accessing probate proceedings; Telephone conference with Court offices in Idaho and Montana re probate proceedings in either state related to claw back individual; Search for probate proceedings related to claw back individual in state public records in Idaho and Utah | 1.80 | 270.00 |
| 4/30/21 | DEB | Review and revise opposition to motion to dismiss; Conference with Cynthia Love and Claire McGuire; Telephone conference with clawback defendants; Prepare summaries of payments and disbursements; Attend to stipulation and proposed order to extend briefing schedule | 5.60 | 1,820.00 |
| 4/30/21 | RMB | Communicate with Heather Taylor re pending claims; Review and analyze settlement offer from Kirkham group; Analyze default judgment issues for Estate of Mary LaJean Dearden | 1.30 | 422.50 |
| 4/30/21 | MTH | Review message from opposing counsel; Correspond with Claire McGuire re case | .10 | 32.00 |
| 4/30/21 | MJB | (Hafen v. Howell) Correspond with Patrick Johnson (0.1) | .10 | 31.50 |
| 4/30/21 | CDL | Revise opposition to motion to dismiss; conference re same | 3.80 | 950.00 |
| 4/30/21 | EWB | Redact sensitive information from produced documents | .80 | 172.00 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 4/30/21 | CMM | Make final edits to motion opposing motion to dismiss in the Taylor claw back; Add citations to the same; Edit and finalize response to motion to Dismiss in Taylor claw back; Attorney conference with Cynthia Love and Daniel Barnett about damages issue; Research issue of when 12(b)(7) can be converted into a rule 56 motion sua sponte by the court; Draft research summary re the same | 7.70 | 1,732.50 |
| 4/30/21 | SB | Communications with Daniel Zarkou; Research and create a background report on Kenneth R and LaJean Mary. Dearden to identify the Trust and other assets; Review reports and create notes and send to Daniel Zarkou | 1.20 | 180.00 |
| 4/30/21 | DZ | Search for invoices related to claw back case per Jeff Shaw request; Search for probate proceedings on Xchange; Coordinate with Susie Bailey re information re estate related to claw back case; Coordinate with Xchange representative re access to probate proceedings related to claw back case; Send expert deadlines to BRG for Matt Ball claw back case; Add updated claw back deadlines to spreadsheet | 2.00 | 300.00 |
| 5/03/21 | JMC | Review and analyze financial documents of net winner; Correspond with Matt Ball re the same; Correspond with Gary Longmore re amended tax return | 1.30 | 435.50 |
| 5/03/21 | RMB | Communicate with Brandon Smith re Guadalupe Valencia claw-back claim; Communicate with Brent Baker re Guadalupe Valencia claim; Prepare Notice of Voluntary Dismissal of Augustin Rico; Prepare for Dearden depositions; Communicate with Brett Anderson re Dearden depositions; Review Kirkham settlement offer and analysis; Communicate with Jeff Shaw re Kirkham matter | 3.80 | 1,235.00 |
| 5/03/21 | MTH | Review correspondence from Claire McGuire re case; Review message from opposing counsel re claw back action; Correspond with Claire McGuire re case strategy; Review correspondence from opposing counsel re settlement and correspond with legal team re same; Review and respond to correspondence from opposing counsel; Correspond with Jonathan Hafen re settlement agreement; Correspond with opposing counsel re meeting; Review and respond to correspondence from opposing counsel re case | 1.00 | 320.00 |
| 5/03/21 | MJB | (Hafen v. Goodsell) Correspond with Joseph Covey (0.3); Correspond with Daniel Zarkou (0.1); Correspond with Shaun Peck (0.1) | .50 | 157.50 |
| 5/03/21 | DPMP | Telephone conversation with claw back defendant's counsel; Research enforceability of judgments in foreign states; Review alleged defenses identified by counsel | 8.10 | 2,025.00 |
| 5/03/21 | CMM | Emails scheduling call with investor claw back counsel; Research tolling issues and timing; Call with Cynthia Love re the same; Email summarizing research and scheduling to Michael Hoppe; Research issues of precious metals valuation | 4.30 | 967.50 |
| 5/03/21 | SB | Research background of the Dearden Kenneth R. Trust, Kenneth Dearden and LaJean Deardean; Check property records, address information, asset information and relative information | 1.50 | 225.00 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 5/03/21 | DZ | Respond to email from Michael Hoppe re settlement payments related to claw back case; Coordinate with Utah Xchange re probate records; Send email to Rodger Burge re private Court records related to probate search; Send email to Jeff Shaw re RRC invoice search related to claw back case | .20 | 30.00 |
| 5/04/21 | JMC | Correspond with Dan Barnett and Jon Hafen re bankruptcy and clawback matters; Review financials; Correspond with Matt Ball re settlement counter-proposal; Correspond with Cynthia Love re clawback settlements | 1.30 | 435.50 |
| 5/04/21 | DEB | Telephone conference with counsel re outstanding issues; Follow up on communications with defendants and counsel for defendants re negotiations and finances | 3.80 | 1,235.00 |
| 5/04/21 | RMB | Teleconference with Jeff Shaw re Kirkham settlement offer and analysis; Evaluate Kirkham offer and prepare analysis for Jon Hafen; Communicate with Jeff Colemere re Gary Nielson claw-back action; Communicate with Jeff Shaw re Gary Nielson claw-back action; Prepare for Dearden depositions; Teleconference with Brandon Smith re Guadalupe Valencia claw-back action; Review Adrian Alvarez investment activity and documentation | 4.80 | 1,560.00 |
| 5/04/21 | MTH | Review correspondence from opposing counsel re case; Review correspondence from Claire McGuire re claw back action; Telephone conference with opposing counsel re case; Telephone conference with Claire McGuire re case strategy | .60 | 192.00 |
| 5/04/21 | MJB | (Hafen v. Goodsell) Correspond with Daniel Zarkou (0.2); Correspond with Joseph Covey (0.2) | .40 | 126.00 |
| 5/04/21 | CDL | Conference with opposing counsel re various claw backs | 1.70 | 425.00 |
| 5/04/21 | CMM | Research issue of pre-ponzi disbursements in response to opposing counsel in claw back action; Call with Michael Hoppe and opposing re the same; Draft email to Jeff Shaw about meeting for same investor to discuss settlement; Research amount of precious metals sold at end of Ponzi; Review declarations from Brinks and Ray Strong re profitability of various arms of Ponzi; Review Taylor claw back motion to dismiss and find documents for production | 5.80 | 1,305.00 |
| 5/04/21 | DZ | Coordinate with Matt Ball re investor group property, business, and assets questions; Telephone conference with Utah Department of Transportation re question related to investor group assets; Search Cache County Recorder's database for property information related to Matt Ball investor group; Search for business information related to Matt Ball investor group on Google and Utah Business Search page; Coordinate with Claire McGuire re inventory sold or auctioned by Receivership; Search ledger reports for inventory sales or auctions; Search for settlement agreement and send to BRG | 4.10 | 615.00 |
| 5/05/21 | JMC | Correspond with Dan Barnett re several clawback settlement matters and bankruptcies; Correspond with Steve Waterman re payment by Zions Bank; Review and analyze receivership order for engagement of local Arizona counsel for bankruptcy prosecution | 2.80 | 938.00 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 5/05/21 | DEB | Conference with Arizona counsel re bankruptcy claims and issues; Review documents and correspondence re same | 1.50 | 487.50 |
| 5/05/21 | RMB | Review and finalize settlement agreement with Kliff Bare; Further investigation and analysis of Kirkham claw-back and settlement offer; Further investigation and analysis of potential claw-back claims | 4.20 | 1,365.00 |
| 5/05/21 | MTH | Review correspondence from expert re accounting issues; Correspond with expert re same | .20 | 64.00 |
| 5/05/21 | MJB | (Hafen v. Howell) Correspond with Patrick Johnson (0.1) | .10 | 31.50 |
| 5/05/21 | MJB | (Hafen v. Goodsell) Correspond with Shaun Peck (0.1); Correspond with Jon Hafen (0.2) | .30 | 94.50 |
| 5/05/21 | CDL | Attend various issues re claw backs; updated master claw back matrix; inventory of outstanding claims | 5.60 | 1,400.00 |
| 5/05/21 | DPMP | Telephone conversation with claw back defendant discussing whether contributions through a third party can be offset against distributions to the defendant; Research re same; Review documents provided by defendant; Analyze court orders re same | 4.10 | 1,025.00 |
| 5/05/21 | CMM | Call with Walter Peterson about inventory at the store when Receivership took over and tax document requests; Emails with Jeff Shaw re possible appreciation of precious metals if kept by Gaylen Rust for pendency of Ponzi; Track down spot prices and possible valuation from metals expert; Review statements from Erkelens and Olsen, Legacy Rare Coins, Ian Russell and Monarch Coin to determine value of precious metals on site to prepare for settlement negotiations; Call with Daniel Zarkou re the same | 4.30 | 967.50 |
| 5/05/21 | DZ | Coordinate with Claire McGuire re total sales of volume of auctions and sales of RRC metals; Email Ian Russell re sales volume of Great Collections auction; Email Walter Peterson to confirm the sales volume from RRC bullion and low-value metals; Email Claire McGuire with total sales volume from metals sales and auctions confirmed by Walter Peterson | .80 | 120.00 |
| 5/06/21 | DEB | Williams, Devan Fields, McGrath AZ Counsel | 2.90 | 942.50 |
| 5/06/21 | RMB | Communicate with Daniel Zarkou re claw-back case status and filings; Communicate with Kliff Bare re claw-back action and Mike and Patty Dearden dismissal; Review Holmes settlement agreement and status of settlement payments; Analyze Adrian Alvarez investment issues and Guadalupe Valencia claw-back claim | 3.40 | 1,105.00 |
| 5/06/21 | MTH | Review correspondence and research information re claw back claim | .50 | 160.00 |
| 5/06/21 | CDL | Attend various claw backs; review proposed settlement agreements | 4.20 | 1,050.00 |
| 5/06/21 | DPMP | Review documents provided by claw back defendant; Telephone conversation with claw back defendant to explain why they are liable and possible settlement structure; Review additional correspondence between Gaylen Rust and defendant; Research case law re defenses | 7.60 | 1,900.00 |
| 5/06/21 | CMM | Draft inventory email to Michael Hoppe relating to investor claw back | .20 | 45.00 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 5/06/21 | DZ | Email Claire McGuire re Ian Russell response re sales volume for Great Collections auctions; Coordinate with Toni Gard-Moore re settlement agreement related to Michael Hoppe investor group; Coordinate with Wendy Tuckett re filing returns of service for summons in Jeff Balls' claw back case; Coordinate with Rodger Burge and Cheryl Healy re filing returns of service for summons in Rodger Burge's claw back cases | 1.90 | 285.00 |
| 5/07/21 | DEB | Draft motion for appointment of Arizona counsel; Begin drafting motion for partial summary judgment; Review financials provided by clawback defendant | 4.90 | 1,592.50 |
| 5/07/21 | RMB | Prepare settlement analysis of Kirkham claw-back claim for Jon Hafen; Communicate with Brent Baker re Holmes settlement status; Analyze Adrian Alvarez investment issues | 2.80 | 910.00 |
| 5/07/21 | MTH | Contact Joe Covey re claw back issues | .10 | 32.00 |
| 5/07/21 | DPMP | Review claw back defendant's claims file; Telephone conversation with claw back defendant to explain why their relatives are liable and possible settlement structure; Review additional correspondence between Gaylen Rust and defendant; Research case law re defenses | 8.30 | 2,075.00 |
| 5/07/21 | DZ | Coordinate with Rodger Burge re settlement payment for one of his claw back cases; Coordinate with Kathy Bates, Rodger Burge, and Wendy Tuckett re same; Telephone conference with Walter Peterson re statements to support the gross and net sales volumes for RRC auctions in 2020 to support our 2020 tax filings; Coordinate with Erkelens and Olsen and Great Collections re same; Review email from Dan Barnett re status of one of his claw back cases | 1.30 | 195.00 |
| 5/10/21 | DEB | Continue drafting motion for partial summary judgment; Review financials and information from defendants | 1.80 | 585.00 |
| 5/10/21 | RMB | Communicate with Brent Baker re Holmes settlement payment; Review Jeff Colemere letter re Gary Nielson claw-back claims | .50 | 162.50 |
| 5/10/21 | MJB | (Hafen v. Howell) Correspond with Jeff Shaw (0.1); Telephone conference with Tina Rinde (0.1); Revise deposition notice (0.1) | .30 | 94.50 |
| 5/10/21 | CDL | Review and revise opposition to motion to dismiss | 4.20 | 1,050.00 |
| 5/10/21 | DPMP | Review evidence of contributions made by claw back defendant; Cross-reference same with internal records; Research offsets alleged by defendant | 3.10 | 775.00 |
| 5/10/21 | WOP | Redaction project | 4.90 | 1,127.00 |
| 5/10/21 | DZ | Review Dan Barnett email re documents produced by Vickie Bauer in RRC claw back case; Download documents and copy to internal network for Dan Barnett review; Coordinate with Ian Russell re settlement statements related to RRC metals auctions in 2020; Review email from Margarita Gonzales re RRC insurance policies | .70 | 105.00 |
| 5/11/21 | JMC | Correspond with Steve Christiansen re clawback action against his client; Correspond with Michael Hoppe re net winner claim | .90 | 301.50 |
| 5/11/21 | DEB | Continue drafting motion for partial summary judgment, review deposition transcripts, prepare exhibits | 4.80 | 1,560.00 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 5/11/21 | MTH | Telephone conference with Joe Covey re claims; Correspond with expert re claims; correspond with Claire McGuire re meeting with claw back defendant; Begin drafting correspondence to opposing counsel re case | .90 | 288.00 |
| 5/11/21 | MJB | (Hafen v. Howell) Correspond with Patrick Johnson (0.1); Correspond with Tina Rinde (0.1); Prepare for Howell depositions (5.4) ; Conference with Cynthia Love (0.2) | 5.80 | 1,827.00 |
| 5/11/21 | MJB | (Hafen v. Goodsell) Correspond with Shaun Peck (0.1) | .10 | 31.50 |
| 5/11/21 | CDL | Attend various issues re claw backs; revise opposition to motion to dismiss | 5.40 | 1,350.00 |
| 5/11/21 | DZ | Verify deposition transcript related to Sonya Kennedy for exhibits; Store deposition exhibit with other deposition exhibits; Coordinate with Rodger Burge re electronic deposition exhibit for Sonya Kennedy | .70 | 105.00 |
| 5/12/21 | DEB | Continue drafting motion for partial summary judgment, review deposition transcripts, prepare exhibits | 4.50 | 1,462.50 |
| 5/12/21 | RMB | Review additional documentation and analysis from Jeff Colemere | .70 | 227.50 |
| 5/12/21 | MTH | Review correspondence from claw back defendant and respond to same; Correspond with forensic accountant re meeting; Draft correspondence to opposing counsel in claw back matter; Correspond with opposing counsel; Review case information and materials re claw back action; Correspond with legal team re case; Review and respond to correspondence from claw back defendant | 1.90 | 608.00 |
| 5/12/21 | MJB | (Hafen v. Howell) Correspond with Tina Rinde (0.1); Prepare for depositions of Les and Gretchen Howell (5.2); Correspond with Jeff Shaw (0.1) | 5.40 | 1,701.00 |
| 5/12/21 | MJB | (Hafen v. Goodsell) Correspond with Tonya Wright (0.1) | .10 | 31.50 |
| 5/12/21 | JAB | Email Jeff Shaw re analysis; Email Ryan Pahnke | .10 | 28.50 |
| 5/12/21 | CDL | Legal research re motion to dismiss; revise same | 5.40 | 1,350.00 |
| 5/12/21 | DPMP | Telephone conversation with claw back defendant to discuss liability and enforceability of judgment; Research case law re enforceability of judgment; Research assets held by claw back defendant | 4.10 | 1,025.00 |
| 5/12/21 | CMM | Discuss response to Taylor Motion to dismiss with Cynthia Love re interest not maintained by estate; Research joinder and dismissal in the context of estates | 2.50 | 562.50 |
| 5/12/21 | DZ | Coordinate with Walter Peterson re receiving financial statements from auction house that assisted with auctioning RRC inventory to prepare for filing taxes; Coordinate with Walter Peterson re war room | .20 | 30.00 |
| 5/13/21 | DEB | Continue drafting motion for partial summary judgment, review deposition transcripts, prepare exhibits | 5.40 | 1,755.00 |
| 5/13/21 | RMB | Revise settlement analysis for Kirkham claim; Review and analyze settlement offer and additional documentation from Jeff Colemere; Analyze Alvarez investment activity | 3.50 | 1,137.50 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 5/13/21 | MTH | Review correspondence from opposing counsel and correspond with legal team re same; Correspond with Claire McGuire re case; Telephone conference with Claire McGuire re case; Correspond with opposing counsel re claw back case | .50 | 160.00 |
| 5/13/21 | CDL | Attend various issues re claw backs | 1.20 | 300.00 |
| 5/13/21 | EWB | Redact sensitive information from produced documents | 1.40 | 301.00 |
| 5/13/21 | DZ | Coordinate with Dan Barnett re redaction questions to prepare for expert declaration in the Evans matter; Redact a page and confirm my redaction approach with Dan Barnett for the same matter | .30 | 45.00 |
| 5/14/21 | DEB | Revise, finalize, and file motion for partial summary judgment | 3.50 | 1,137.50 |
| 5/14/21 | MJB | (Hafen v. Howell) Correspond with Jon Hafen and Ray Strong (0.1); Correspond with Patrick Johnson (0.1) | .20 | 63.00 |
| 5/14/21 | JAB | Telephone conference with Jeff Shaw | .40 | 114.00 |
| 5/14/21 | CDL | Review motion for partial summary judgment in claw back action | .40 | 100.00 |
| 5/14/21 | DPMP | Research assets held by claw back defendant; Review claims file to identify additional bank accounts; Research protections afforded by trust and corporate form and whether the fraudulent transfer statute allows piercing of those protections | 6.30 | 1,575.00 |
| 5/14/21 | EWB | Redact sensitive information from produced documents | 5.70 | 1,225.50 |
| 5/14/21 | WOP | Redaction project | 3.90 | 897.00 |
| 5/14/21 | DZ | Redact privileged bank information from expert declaration for Dan Barnett claw back case; Coordinate with Dan Barnett re redaction questions; Redact additional information per Dan Barnett request and send to Dan Barnett the final, redacted expert declaration | 3.00 | 450.00 |
| 5/17/21 | JMC | Draft Oberhansly settlement agreement | 1.10 | 368.50 |
| 5/17/21 | DEB | Review documents and correspondence re settlement discussions and clawbacks | .60 | 195.00 |
| 5/17/21 | RMB | Review and analyze Kirkham claim and settlement offer; Review Gary Nielson documentation | .80 | 260.00 |
| 5/17/21 | MTH | Review correspondence from opposing counsel re claw back action; Correspond with legal team and expert re claw back action; Correspond with opposing counsel; Review and respond to correspondence from opposing counsel | .30 | 96.00 |
| 5/17/21 | MJB | (Hafen v. Howell) Conference with Cynthia Love (0.2); Telephone conference with Jeff Shaw (0.6); Revise deposition outline (0.7); Correspond with Jeff Shaw (0.1) | 1.60 | 504.00 |
| 5/17/21 | MJB | (Hafen v. Goodsell) Correspond with Tonya Wright (0.1); Review documents (0.2) | .30 | 94.50 |
| 5/17/21 | JAB | Review analysis from Jeff Shaw | .90 | 256.50 |
| 5/17/21 | CDL | Telephone conference with Ray Strong; claim analysis; update master claw back matrix | 4.70 | 1,175.00 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 5/17/21 | DPMP | Research protections afforded by trust and corporate form and whether the fraudulent transfer statute allows piercing of those protections; Research foreign jurisdictions' protections; Review correspondence between Gaylen Rust and claw back defendant | 8.60 | 2,150.00 |
| 5/17/21 | EWB | Redact sensitive information from produced documents | 2.30 | 494.50 |
| 5/18/21 | JMC | Correspond with Cynthia Love re potential clawback action against a bank; Correspond to Aleexa Franklin's counsel re settlement payments and related issues; Draft settlement agreement with the Oberhanslys; Review and analyze documents related to the same | 6.80 | 2,278.00 |
| 5/18/21 | DEB | Review communication from counsel re settlement proposal; Review opposition to motion to dismiss | 2.20 | 715.00 |
| 5/18/21 | RMB | Analyze settlement counteroffers from plaintiffs' counsel and evaluate settlement strategy (.7) | .70 | 227.50 |
| 5/18/21 | RMB | Teleconference with Jeff Shaw re Kirkham analysis and settlement negotiations; Further analysis and review of Gary Nielson claim and settlement strategy; Review Lugli complaint against Zions Bank; Evaluate summary judgment motion for Kennedy Barnes claim | 4.20 | 1,365.00 |
| 5/18/21 | MJB | (Hafen v. Howell) Correspond with Jon Hafen (0.1) | .10 | 31.50 |
| 5/18/21 | MJB | (Hafen v. Goodsell) Draft letter to Shaun Peck (0.4); Correspond with Shaun Peck (0.1) | .50 | 157.50 |
| 5/18/21 | JAB | Conference with Rodger Burge; Research subsequent transferee | .60 | 171.00 |
| 5/18/21 | CDL | Telephone conference with Ray Strong; telephone conference with Joe Covey; telephone conference with Receiver; attend various issues re claw backs | 5.50 | 1,375.00 |
| 5/18/21 | DZ | Review ledger reports to verify the correct amount of settlement checks received since the conception of the Receivership; Coordinate with Kathy Bates re two settlement payments; Review email from Wendy Tuckett re RRC settlement payment | .90 | 135.00 |
| 5/19/21 | KBT | Office conference with Roger Burge re Keith Kirkham MD Defined Benefit Plan; Analyze ERISA issues; Review pension plan Form 5500 | 1.40 | 637.00 |
| 5/19/21 | JMC | Correspond with Cynthia Love re clawback action by conflicts receiver against bank and related issues | 1.80 | 603.00 |
| 5/19/21 | DEB | Review and revise opposition to motion to dismiss | 6.60 | 2,145.00 |
| 5/19/21 | RMB | Analyze ERISA issue for Kirkham profit sharing plan defendant; Analyze Adrian Alvarez investment activities in connection with motion for default judgment; Review and prepare litigation strategy for Andreini defendants | 4.30 | 1,397.50 |
| 5/19/21 | MJB | (Hafen v. Howell) Correspond with Patrick Johnson (0.1); Conference with Joseph Covey (0.1) | .20 | 63.00 |
| 5/19/21 | JAB | Conference with Rodger Burge | .20 | 57.00 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 5/19/21 | DPMP | Telephone conversation with opposing counsel re claw back action; Outline proposed settlement agreement; Review documents related to defendant's ability to repay judgment; Research defenses raised by opposing counsel; Research possible health concerns raised by counsel | 7.20 | 1,800.00 |
| 5/19/21 | EWB | Redact sensitive information from produced documents | 2.20 | 473.00 |
| 5/19/21 | CMM | Make final edits to response to motion to dismiss in Taylor claw back; Discuss changes and filing with Cynthia Love; Add citations to the same | 1.30 | 292.50 |
| 5/20/21 | DEB | Review and revise opposition to motion to dismiss | 5.80 | 1,885.00 |
| 5/20/21 | RMB | Analyze ERISA issues for Kirkham settlement; Review and analyze Banyan/Mike Chapman investment activities and documents; Review and analyze Adrian Alvarez investment documentation | 4.40 | 1,430.00 |
| 5/20/21 | MJB | (Hafen v. Howell) Correspond with Ray Strong and Jon Hafen (0.1); Correspond with Patrick Johnson (0.2) | .30 | 94.50 |
| 5/20/21 | CDL | Update re various claw backs; telephone conference re opposition to motion to dismiss | 1.80 | 450.00 |
| 5/20/21 | DPMP | Telephone conversation with Cynthia Love re claw back action status update; Revise case approach to reflect same; Review prior case files to determine the best way to proceed with claw back actions; Review prior settlement discussions | 6.20 | 1,550.00 |
| 5/20/21 | EWB | Redact sensitive information from produced documents | 4.40 | 946.00 |
| 5/21/21 | DEB | Review and revise opposition to motion to dismiss; Finalize and file | 2.80 | 910.00 |
| 5/21/21 | RMB | Review and analyze Mike Chapman claw-back claim and relationship with Banyan Ventures; Review settlement agreement with Kliff Bare; Review Mike Johnson documentation and claw-back claim; Prepare settlement email to Cynthia Love re Miriam Martinez settlement issues; Communicate with Robb Jones re Dolores Batalla claw-back action; Plan litigation strategy for Dearden group defendants | 4.60 | 1,495.00 |
| 5/21/21 | MTH | Correspond with claw back defendant re case | .10 | 32.00 |
| 5/21/21 | MJB | (Hafen v. Howell) Correspond with Jeff Shaw (0.1); Correspond with Patrick Johnson (0.2) | .30 | 94.50 |
| 5/21/21 | CDL | Attend various issues re claw backs; telephone conference re opposition to motion to dismiss; review same | 1.80 | 450.00 |
| 5/21/21 | DPMP | Telephone conversation with opposing counsel re case status; Research effect of defendant's mental capacity on ability to prosecute the case, ability to obtain discovery, and enforceability of judgment; Review Rust documents related to claw back defendant to determine whether there was a capacity problem during dealings with Gaylen Rust | 8.60 | 2,150.00 |
| 5/21/21 | EWB | Redact sensitive information from produced documents | 2.30 | 494.50 |
| 5/21/21 | WOP | Redaction project | 4.80 | 1,104.00 |
| 5/21/21 | DZ | Coordinate with Rodger Burge re settlement agreement and implications on investor claim related to claw back case; Email Jonathan Hafen re settlement agreement | .40 | 60.00 |
| 5/23/21 | EWB | Redact sensitive information from produced documents | 1.20 | 258.00 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 5/24/21 | JMC | Correspond with Dan Barnett re McGrath non-discharge bankruptcy meeting | .30 | 100.50 |
| 5/24/21 | DEB | Review Gaylen Rust phone records; Correspondence with counsel re meeting of creditors | 1.00 | 325.00 |
| 5/24/21 | RMB | Review Mike Chapman and Banyan Ventures file; Review Andreini defendant file and investment analysis; Prepare for Dearden group depositions | 2.60 | 845.00 |
| 5/24/21 | MTH | Review and respond to correspondence from claw back defendant; Review correspondence from Claire McGuire re claw back action and correspond with team re same | .20 | 64.00 |
| 5/24/21 | DPMP | Research effect of defendant's mental capacity on ability to prosecute the case, ability to obtain discovery, and enforceability of judgment; Review Rust documents related to claw back defendant to determine whether there was a capacity problem during dealings with Gaylen Rust | 8.30 | 2,075.00 |
| 5/25/21 | JMC | Correspond with Dan Barnett and Keith Hendricks re McGrath bankruptcy issues; Revise and finalize Oberhansly settlement agreement; Correspond with Jon Hafen, Cynthia Love and Ray Strong re the same | 4.60 | 1,541.00 |
| 5/25/21 | DEB | Review summary of meeting of creditors; Review bankruptcy records; Communications with Arizona counsel re bankruptcy proceedings | 1.90 | 617.50 |
| 5/25/21 | DPMP | Research effect of defendant's mental capacity on ability to prosecute the case, ability to obtain discovery, and enforceability of judgment; Telephone conversation with opposing counsel re capacity; Telephone conversation with opposing counsel re case status | 6.20 | 1,550.00 |
| 5/25/21 | WOP | Redaction project | 3.50 | 805.00 |
| 5/25/21 | DZ | Send email blast and upload Court documents to RRC Receivership website | .20 | 30.00 |
| 5/26/21 | JMC | Correspond with Dan Barnett re various clawback actions; Correspond with local counsel re McGrath bankruptcy issues | .90 | 301.50 |
| 5/26/21 | RMB | Review documents and file for Mike Chapman and Banyan Ventures claw-back and investment file; Communicate with Tyler Thatcher re Mike Chapman claim; Analyze Andreini defendant claims and investment activity | 2.40 | 780.00 |
| 5/26/21 | DPMP | Telephone conversation with opposing counsel re case status; Research defenses raised by opposing counsel ; Review correspondence between claw back defendant and Gaylen Rust; Review claw back defendant's claims file; Revise case settlement prospects; Research additional claims that could be filed against defendant; Verify defendant's contributions | 8.60 | 2,150.00 |
| 5/27/21 | JMC | Correspond with Dan Barnett re McGrath bankruptcy issues | .30 | 100.50 |
| 5/27/21 | DEB | Communications re private investigations; Review documents and correspondence re same | 2.40 | 780.00 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 5/27/21 | DPMP | Review correspondence between claw back defendant and Gaylen Rust; Review claw back defendant's claims file; Revise case settlement prospects; Analyze whether defendant could potentially be on inquiry notice | 7.60 | 1,900.00 |
| 5/27/21 | WOP | Redaction project | 1.90 | 437.00 |
| 5/27/21 | CMM | Review letter from opposing counsel in settlement negotiations with investor; Review agreement for commission scheme; Research issue of comingling of funds; Review and Analyze final schedule of investor activity from Jeff Shaw and provide the same to opposing counsel | 6.80 | 1,530.00 |
| 5/28/21 | JMC | Correspond with Ray Strong and Mark Pugsley re settlement agreement; Review Oberhansly tax filings; Correspond with Shawn Egan re Alesha Franklin | .70 | 234.50 |
| 5/28/21 | RMB | Communicate with Jeff Shaw re Gary Nielson claw-back claim and analysis ; Prepare for teleconference with Tyler Thatcher; Further analysis of Mike Chapman and Baynan Ventures claw-back claim | 1.60 | 520.00 |
| 5/28/21 | MTH | Review correspondence from opposing counsel re claim and correspond with Claire McGuire re same | .10 | 32.00 |
| 5/28/21 | MJB | (Hafen v. Goodsell) Correspond with Shaun Peck (0.1) | .10 | 31.50 |
| 5/28/21 | EWB | Redact sensitive information from produced documents | 2.80 | 602.00 |
| 5/29/21 | WOP | Redaction project | 4.60 | 1,058.00 |
| 6/01/21 | JMC | Correspond with Michael Hoppe, Claire McGuire and Jeff Shaw re clawback matter and upcoming meeting; Review and analyze clawback analysis; Correspond with Cynthia Love, Jon Hafen and Ray Strong re depositions in Howell case; Correspond with Jon Hafen, Cynthia Love and Ray Strong re Oberhansly settlement | 3.30 | 1,105.50 |
| 6/01/21 | DEB | Review claim summary spreadsheet; Prepare and file pretrial disclosures | 4.80 | 1,560.00 |
| 6/01/21 | RMB | Communicate with Cynthia Love and Jon Hafen re claw-back claims; Communicate with Robb Jones re Dolores Batalla claim; Communicate with Jeff Shaw re Gary Nielson matter; Review additional investment analysis from Gary Nielson counsel | 1.40 | 455.00 |
| 6/01/21 | MTH | Review correspondence from opposing counsel and Claire McGuire re claw back analysis; Correspond with Jeff Shaw re claw back analysis; Correspond with opposing counsel re accounting analysis; Prepare for meeting with team re significant claw back claim; Meet with Joe Covey, Claire McGuire and Jeff Shaw re claw back analysis in preparation for meeting with opposing party and counsel | 2.00 | 640.00 |
| 6/01/21 | MJB | (Hafen v. Howell) Conference with Jon Hafen (0.1) | .10 | 31.50 |
| 6/01/21 | CDL | Attend various issues re claw backs; meeting with Receiver re settlement agreement; telephone conference with Joe Covey re same | 2.20 | 550.00 |

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| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 6/01/21 | DPMP | Telephone conversation with opposing counsel re case status; Research defenses raised by opposing counsel; Review Rust documents re claw back defendant's case file; Revise case settlement prospects; Verify defendant's contributions; Analysis of possible assets held by claw back defendant | 5.30 | 1,325.00 |
| 6/01/21 | EWB | Redact sensitive information from produced documents | 5.20 | 1,118.00 |
| 6/01/21 | CMM | Meeting with Michael Hoppe, Jeff Shaw and Joseph Covey to prepare for settlement negotiation to take place tomorrow with investor; Review all documents and evidence supporting Receiver's claims in case of investor | 6.50 | 1,462.50 |
| 6/01/21 | DZ | Telephone conference with Dan Barnett re documents produced in the Evans and Taylor claw back cases; Respond to Email from Jon Hafen re claw back agreement related to Rodger Burge investor group | .30 | 45.00 |
| 6/02/21 | JMC | Review correspondence from James Tracy re clawback action; Prepare for and attend meeting with Michael Hoppe, James Tracy and others re clawback settlement and related issues | 2.50 | 837.50 |
| 6/02/21 | DEB | Review correspondence and case status; Review correspondence and documents re financial statements and settlements | .80 | 260.00 |
| 6/02/21 | RMB | Prepare for meeting with Jeff Shaw re Gary Nielson claw-back claim; Meet with Jeff Shaw re Gary Nielson claw-back claim and additional analysis; Meet with Cynthia Love re Miriam Martinez claim; Prepare for Dearden depositions; Prepare summary judgment motion for Kennedy claw-back | 3.70 | 1,202.50 |
| 6/02/21 | MTH | Prepare for meeting with opposing counsel and experts re claw back action; Meeting with Joe Covey and Claire McGuire; Review correspondence from claw back defendant | 2.20 | 704.00 |
| 6/02/21 | EWB | Redact sensitive information from produced documents | 8.10 | 1,741.50 |
| 6/02/21 | CMM | Read emails from opposing counsel presenting new arguments to consider at negotiation; Pull various receipts referenced by opposing counsel; Pull order establishing Ponzi scheme presumption; Review Strong report for meeting; Meet with opposing counsel and their forensic accountant about possible settlement offers with Joseph Covey, Michael Hoppe and Jeff Shaw | 4.50 | 1,012.50 |
| 6/02/21 | DZ | Coordinate with Claire McGuire re expert report and Court Order related to Motion for Summary Judgement; Search for and send to Claire McGuire the same; Upload bates numbered expert report and appendices to internal network for Claire McGuire access | .40 | 60.00 |
| 6/03/21 | DEB | Review financials, statements, and correspondence; Continue preparing trial documents | 6.00 | 1,950.00 |
| 6/03/21 | RMB | Prepare for Dearden depositions; Prepare summary judgment motion for Kennedy claw-back group | 3.30 | 1,072.50 |
| 6/03/21 | MTH | Review and respond to correspondence from expert re claw back action; Telephone conference with expert re valuation | .40 | 128.00 |

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|---|---|---|---|---|
| 6/03/21 | MJB | (Hafen v. Howell) Correspond with Jeff Shaw (0.1); Correspond with Patrick Johnson (0.1); Prepare for depositions of Les and Gretchen Howell (2.4) | 2.60 | 819.00 |
| 6/03/21 | DPMP | Analysis of possible assets held by claw back defendant; Research possible claims to be asserted against defendant; Telephone conversation with opposing counsel re settlement possibilities; Research defenses raised by opposing counsel; Review Rust documents re claw back defendant's case file; | 8.50 | 2,125.00 |
| 6/03/21 | EWB | Redact sensitive information from produced documents | 1.20 | 258.00 |
| 6/03/21 | DZ | Search for and send settlement agreements and signed orders for summary judgment in claw back cases to Jeff Shaw; Send email to Jeff Balls re settlement agreement; Update settlement and summary judgement info into RRC settlements spreadsheet | .90 | 135.00 |
| 6/04/21 | DEB | Review financials, statements, and correspondence; Continue preparing trial documents | 3.80 | 1,235.00 |
| 6/04/21 | RMB | Prepare for Dearden depositions; Review analysis from Jeff Shaw re Gary Nielson claw-back claim | 1.30 | 422.50 |
| 6/04/21 | MJB | (Hafen v. Howell) Depose Les and Gretchen Howell (4.6) | 4.60 | 1,449.00 |
| 6/04/21 | DPMP | Analysis of possible assets held by claw back defendant; Research possible claims to be asserted against defendant; Telephone conversation with claw back defendant re issues with transfers to third parties and family members; Review financial documents provided by claw back defendant | 8.20 | 2,050.00 |
| 6/04/21 | EWB | Redact sensitive information from produced documents | .90 | 193.50 |
| 6/04/21 | WOP | Redaction project | 5.60 | 1,288.00 |
| 6/07/21 | DEB | Review financials, statements and correspondence; Continue preparing trial documents | .50 | 162.50 |
| 6/07/21 | MJB | (Hafen v. Howell) Conference with Jon Hafen and Cynthia Love (0.3); Correspond with Ray Strong (0.1); Correspond with Patrick Johnson (0.1) | .50 | 157.50 |
| 6/07/21 | EWB | Redact sensitive information from produced documents | .30 | 64.50 |
| 6/07/21 | DZ | Search through review and production databases for documents to prepare for Dearden II claw back depositions; Search for documents related to Dearden II claw back group members on internal network; Pull together documents related to the same; Coordinate with Jeff Shaw re bank transactions related to Dearden II claw back group | 2.60 | 390.00 |
| 6/08/21 | RMB | Preparation of summary judgment motion for Barnes Kennedy group; prepare for Dearden group depositions | 2.80 | 910.00 |
| 6/08/21 | MJB | (Hafen v. Goodsell) Review counteroffer (0.2); Correspond with Jon Hafen (0.2) | .40 | 126.00 |
| 6/08/21 | MJB | (Hafen v. Howell) Correspond with Ray Strong (0.1) | .10 | 31.50 |
| 6/08/21 | EWB | Redact sensitive information from produced documents | 2.00 | 430.00 |

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|---|---|---|---|---|
| 6/08/21 | DZ | Review documents sent by Jeff Shaw for Dearden II depositions; Finish tagging documents in review database related to Dearden II claw back group to have processed; Coordinate with SLL re documents to print to PDF in review database; Send file path to Rodger Burge re documents to review for depositions in Dearden II claw back case | 1.80 | 270.00 |
| 6/09/21 | JMC | Correspond with Matt Ball re Howell deposition | .10 | 33.50 |
| 6/09/21 | DEB | Communications with counsel and defendants re case status and settlement communications | .40 | 130.00 |
| 6/09/21 | RMB | Preparation of motion for summary judgment in Barnes-Kennedy matter; Preparation for Dearden group depositions | 2.40 | 780.00 |
| 6/09/21 | MTH | Review and evaluate Jeff Shaw's analysis re net winnings and correspond with Jeff Shaw and legal team re same | .30 | 96.00 |
| 6/09/21 | MJB | (Hafen v. Howell) Correspond with Jon Hafen and Joe Covey (0.1) | .10 | 31.50 |
| 6/09/21 | JAB | Email Judson Pitts re settlement; | .20 | 57.00 |
| 6/09/21 | DPMP | Telephone conversation with claw back defendant re issues potential recoverability; Review Rust Rare Coin documents re claw back defendant to identify critical documents that may establish some sort of notice or increase liability of defendant; Research defenses to judgment; Revise settlement prospects | 6.50 | 1,625.00 |
| 6/09/21 | EWB | Redact sensitive information from produced documents | 4.30 | 924.50 |
| 6/09/21 | DZ | Prepare questions for Rodger Burge re Dearden II deposition documents | .40 | 60.00 |
| 6/10/21 | JMC | Correspond with Michael Hoppe and Jeff Shaw re settlement discussions with James Tracy's client | .70 | 234.50 |
| 6/10/21 | DEB | Review investigator engagement letter; Review new case filings | .40 | 130.00 |
| 6/10/21 | RMB | Preparation of Motion for Summary Judgment in Kennedy Barnes group; Review Dearden investment and related documents for deposition preparation | 3.90 | 1,267.50 |
| 6/10/21 | MJB | (Hafen v. Howell) Correspond with Cynthia Love (0.1); Correspond with Patrick Johnson (0.1) | .20 | 63.00 |
| 6/10/21 | DPMP | Research possible claims to be asserted against defendant; Telephone conversation with claw back defendant re issues with transfers to third parties and family members; Review financial documents provided by claw back defendant; Review claims file; Determine likelihood that claw back defendant will receive anything back in the event of a settlement; Revise possible settlement options | 8.30 | 2,075.00 |
| 6/10/21 | EWB | Redact sensitive information from produced documents | 1.80 | 387.00 |
| 6/10/21 | CMM | Review emails about metals valuation from Jeff Shaw and new proposed settlement for investor; Draft email to Joseph Covey and Michael Hoppe re the same | .60 | 135.00 |

Invoice: 897539 July 15, 2021
Rust Rare Coin Receivership Client: 176430
Asset Analysis & Recovery Matter: 2

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 6/10/21 | DZ | Pull all motions for summary judgment and send to Rodger Burge per his request; Download PDFs processed by SLL and organize for Rodger Burge review for the Dearden II group depositions; Telephone conference with Claire McGuire re audio files for R Legacy Entertainment; Search hard drives for audio files related to R Legacy Entertainment and coordinate with Claire McGuire re the files | 2.20 | 330.00 |
| 6/11/21 | JMC | Correspond with Tom Simek re Aleesha Franklin issues; Correspond with Cynthia Love re Howell depositions | .30 | 100.50 |
| 6/11/21 | DEB | Review RRC financials, investor statements and claims, and tax returns re Ponzi activity | 3.00 | 975.00 |
| 6/11/21 | RMB | Review Dearden discovery responses and investment file | 1.30 | 422.50 |
| 6/11/21 | MJB | (Hafen v. Howell) Correspond with Ray Strong (0.2); Correspond with Patrick Johnson (0.1) | .30 | 94.50 |
| 6/11/21 | DPMP | Telephone conversation with claw back defendant re issues with transfers to third parties and family members; Research novel defenses raised by claw back defendant; Review claims file; Analyze additional documents referenced by claw back defendant | 8.40 | 2,100.00 |
| 6/11/21 | EWB | Redact sensitive information from produced documents | 3.50 | 752.50 |
| 6/11/21 | DZ | Email Rodger Burge re location of the Dearden II deposition documents | .10 | 15.00 |
| 6/12/21 | RMB | Prepare for Dearden group depositions | 5.20 | 1,690.00 |
| 6/12/21 | EWB | Redact sensitive information from produced documents | 1.80 | 387.00 |
| 6/13/21 | EWB | Redact sensitive information from produced documents | 1.10 | 236.50 |
| 6/14/21 | JMC | Correspond with Tom Simek and others re Aleesha Franklin settlement and related issues; Review and analyze settlement agreement and related documents | 1.40 | 469.00 |
| 6/14/21 | DEB | Review pleadings, scheduling order and other financials re discovery, settlement and pending motions | 2.10 | 682.50 |
| 6/14/21 | RMB | Prepare for Dearden group depositions | 6.40 | 2,080.00 |
| 6/14/21 | CDL | Prepare for depositions | 4.80 | 1,200.00 |
| 6/14/21 | DPMP | Review documents to be provided in disclosures as requested by claw back defendant | 3.50 | 875.00 |
| 6/14/21 | EWB | Redact sensitive information from produced documents | 1.50 | 322.50 |
| 6/15/21 | JMC | Correspond with Dan Barnett re various clawback actions and settlements | .30 | 100.50 |
| 6/15/21 | DEB | Review pleadings, financials and documents re discovery and depositions | 2.60 | 845.00 |
| 6/15/21 | RMB | Conduct depositions of Dearden group defendants | 4.60 | 1,495.00 |
| 6/15/21 | MJB | (Hafen v. Goodsell) Correspond with Jon Hafen (0.1); Conference with Jon Hafen and Cynthia Love (0.1); Correspond with Shaun Peck (0.1) | .30 | 94.50 |
| 6/15/21 | MJB | (Hafen v. Howell) Meeting with Ray Strong, Jeff Shaw, Jon Hafen and Cynthia Love (3.3); Assemble deposition binder for Jon Hafen (0.6) | 3.90 | 1,228.50 |
| 6/15/21 | CDL | Deposition prep re Howell claw back; claims analysis meeting | 7.90 | 1,975.00 |

Invoice: 897539 July 15, 2021
Rust Rare Coin Receivership Client: 176430
Asset Analysis & Recovery Matter: 2

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 6/15/21 | EWB | Redact sensitive information from produced documents | 2.40 | 516.00 |
| 6/15/21 | WOP | Redaction project | 1.30 | 299.00 |
| 6/15/21 | DZ | Review email from Lori Stumpf re RRC property notice violation; Telephone conference with Lori Stumpf re same and finding a lawn care person to bring the property in compliance with the city ordinance; Send email to Dan Nelson re same | .40 | 60.00 |
| 6/16/21 | JMC | Correspond with Cynthia Love and Claire McGuire re claim issues | .20 | 67.00 |
| 6/16/21 | JMC | Draft correspondence to James Tracy re settlement proposal for clawback action; Correspond with Michael Hoppe re the same | .60 | 201.00 |
| 6/16/21 | DEB | Review pleadings, financials and documents re discovery and depositions | 5.50 | 1,787.50 |
| 6/16/21 | RMB | Analyze and evaluate Dearden claw-back claim and settlement strategy; Review correspondence from Jeff Shaw re Dearden claim; Communicate with Brad Schmidt re Motion for Summary Judgment and case deadlines; Prepare Motion for Summary Judgment for Kennedy Barnes | 4.40 | 1,430.00 |
| 6/16/21 | MJB | (Hafen v. Howell) Correspond with Ray Strong (0.2) | .20 | 63.00 |
| 6/16/21 | CDL | Attend various issues re claw backs | 3.10 | 775.00 |
| 6/16/21 | DPMP | Telephone conversation with claw back defendant re issues potential recoverability; Analyze possible valuation of Idaho property; Review possible enforceability of judgment against assets held by related entities; Research defenses to judgment; Revise settlement prospects; Review disclosures to be provided to defendant | 7.90 | 1,975.00 |
| 6/16/21 | WOP | Redaction project | 2.30 | 529.00 |
| 6/17/21 | JMC | Review and revise Oberhansly settlement agreement; Correspond with Mark Pugsley, Cynthia Love and Jon Hafen re the same; Review various clawback actions | 2.80 | 938.00 |
| 6/17/21 | DEB | Meet with Cynthia Love, Jonathan Hafen, and Claire McGuire; Review bankruptcy matters; Prepare for depositions | 1.20 | 390.00 |
| 6/17/21 | RMB | Prepare and file Motion for Extension on Dispositive Motion Deadline for Kennedy Barnes matter; Review summary judgment motions for preparation of Motion for Summary Judgment in Kennedy Barnes matter; Prepare Motion for Summary Judgment for Kennedy Barnes matter | 4.20 | 1,365.00 |
| 6/17/21 | MTH | Review correspondence from Joe Covey and information re settlement proposal | .20 | 64.00 |
| 6/17/21 | MJB | (Hafen v. Howell) Deposition preparation with Jon Hafen and Cynthia Love (0.5) | .50 | 157.50 |
| 6/17/21 | CDL | Prepare for and attend deposition of Jon Hafen; claims analysis meeting; attend issues re claw backs | 4.10 | 1,025.00 |
| 6/17/21 | DPMP | Review claims files re claw back defendants | 5.00 | 1,250.00 |
| 6/17/21 | EWB | Redact sensitive information from produced documents | .80 | 172.00 |

Invoice: 897539 July 15, 2021
Rust Rare Coin Receivership Client: 176430
Asset Analysis & Recovery Matter: 2

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 6/17/21 | DZ | Send to Claire McGuire settlement agreement with The Church; Coordinate with Brandon Pringle re email from investor | .30 | 45.00 |
| 6/18/21 | DEB | Review bankruptcy matters | .30 | 97.50 |
| 6/18/21 | RMB | Prepare Motion for Summary Judgment in Kennedy Barnes matter; Prepare analysis of Dearden claw-back claim | 3.40 | 1,105.00 |
| 6/18/21 | MJB | (Hafen v. Howell) Correspond with Ray Strong (0.1); Correspond with Jeff Shaw (0.1) | .20 | 63.00 |
| 6/18/21 | CMM | Review and package claims for Jonathan Hafen review; Review claims for major deltas and begin drafting Motion for claims registry process | 5.20 | 1,170.00 |
| 6/18/21 | DZ | Coordinate with Dan Barnett and the Arizona counsel re some McGrath documents to the Arizona counsel; Coordinate with Dan Barnett re questions related to the documents; Send the documents to the Arizona counsel | .40 | 60.00 |
| 6/21/21 | JMC | Correspond with Mark Pugsley re settlement agreement of clawback action | .30 | 100.50 |
| 6/21/21 | DEB | Review documents and correspondence re depositions; Review opposition to motion for partial summary judgment | 2.30 | 747.50 |
| 6/21/21 | RMB | Prepare analysis of Dearden group claw-back claims and settlement strategy; Prepare motion for summary judgment for Kennedy Barnes group; Prepare analysis of Kirkham settlement options | 7.20 | 2,340.00 |
| 6/21/21 | MTH | Review and respond to correspondence from opposing counsel; Correspond with Jon Hafen re settlement agreement | .20 | 64.00 |
| 6/21/21 | MJB | (Hafen v. Goodsell) Correspond with Shaun Peck (0.1); Correspond with Jon Hafen (0.1) | .20 | 63.00 |
| 6/21/21 | MJB | (Hafen v. Howell) Correspond with Jeff Shaw and Cynthia Love (0.1); Correspond with Patrick Johnson (0.1) | .20 | 63.00 |
| 6/21/21 | EWB | Meet with Claire McGuire re trusts as entities | .10 | 21.50 |
| 6/21/21 | CMM | Claims review for Jonathan Hafen approval; Attorney conference with Joseph Covey about proposed bright line rules and agreements entered into with various venders; Attorney conference with Daniel Zarkou about problem claim that had been split; Figure out digital CD rights for creator who had purchased physical CDs in sale last year | 4.90 | 1,102.50 |
| 6/21/21 | DZ | Attempt to access CD Baby account for R Legacy and troubleshoot access issues; Coordinate with Lori Stumpf re accessing the CD Baby account for R Legacy | .30 | 45.00 |
| 6/22/21 | JMC | Review and analyze McGrath bankruptcy proceeding and asset review; Correspond with Dan Barnett re the same | .70 | 234.50 |
| 6/22/21 | DEB | Conference with Joseph Covey re bankruptcy issues; Communications with Arizona counsel re investigations and objections | .70 | 227.50 |
| 6/22/21 | RMB | Prepare written analysis of Dearden claw-back claims and settlement options; Prepare motion for summary judgment for Kennedy Barnes group | 5.80 | 1,885.00 |
| 6/22/21 | MJB | (Hafen v. Howell) Correspond with Jeff Shaw and Cynthia Love (0.1) | .10 | 31.50 |

Invoice: 897539 July 15, 2021
Rust Rare Coin Receivership Client: 176430
Asset Analysis & Recovery Matter: 2

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 6/22/21 | CMM | Review claims with large deltas to determine when distribution will be possible | 4.00 | 900.00 |
| 6/22/21 | DZ | Call CD Baby to request access to the R Legacy digital albums; Troubleshoot difficulties with accessing the albums and coordinate with Lori Stumpf re same | .60 | 90.00 |
| 6/23/21 | RMB | Evaluate Dearden Group settlement strategy; Prepare summary judgment motion for Kennedy Group | 2.20 | 715.00 |
| 6/23/21 | MTH | Conference with Joe Covey re claw back action; Review correspondence from Joe Covey re case | .20 | 64.00 |
| 6/23/21 | MJB | (Hafen v. Goodsell) Correspond with Tonya Wright (0.1) | .10 | 31.50 |
| 6/23/21 | CDL | Prepare for and attend deposition of Gaylen Rust; telephone conference with Gaylen Rust | 2.10 | 525.00 |
| 6/23/21 | DPMP | Review settlement offer received from opposing counsel | .50 | 125.00 |
| 6/24/21 | JMC | Correspond with James Tracy and Matt Ball re various clawback matters; Correspond with Michael Hoppe re the same; Correspond with Dan Barnett re McGrath home sale; review abandonment motion | 3.80 | 1,273.00 |
| 6/24/21 | DEB | Review documents and correspondence; Meet with Jeff Shaw re expert opinion reports; Communications re scheduling and bankruptcy matters | 2.90 | 942.50 |
| 6/24/21 | MTH | Correspond with claw back defendant re financial information; Review correspondence from opposing counsel; Correspond with legal team re case; Telephone conference with Joe Covey re case; Review correspondence from receiver re settlement agreement; Correspond with opposing counsel re agreement | .60 | 192.00 |
| 6/24/21 | MJB | (Hafen v. Howell) Prepare for deposition of Jon Hafen (0.4); Defend deposition of Jon Hafen (1.6) | 2.00 | 630.00 |
| 6/24/21 | MJB | (Hafen v. Goodsell) Correspond with Tonya Wright (0.1) | .10 | 31.50 |
| 6/24/21 | CDL | Prepare for and attend deposition of Jon Hafen | 2.10 | 525.00 |
| 6/24/21 | DPMP | Prepare summary of settlement offer and likely outcome of litigation; Analysis of claims file to assess the strengths of the settlement offer; Review correspondence from Gaylen Rust re claw back defendant | 4.10 | 1,025.00 |
| 6/25/21 | CDL | Teleconference with Ray Strong | 1.10 | 275.00 |
| 6/25/21 | CMM | Draft motion to dismiss with prejudice in Oberhansley matter; Review Settlement Agreement for the same | .80 | 180.00 |
| 6/28/21 | DEB | Conference with Cynthia Love; Review bankruptcy pleadings; Continue drafting reply in support of partial summary judgment | .90 | 292.50 |
| 6/28/21 | MTH | Review and respond to correspondence from claw back defendant; Telephone conference with claw back defendant | .60 | 192.00 |
| 6/29/21 | JMC | Correspond with Dan Barnett re McGrath bankruptcy strategy | .20 | 67.00 |
| 6/29/21 | DEB | Review bankruptcy pleadings and procedure; Prepare proposed amended schedule; Continue drafting reply in support of partial summary judgment | 3.70 | 1,202.50 |
| 6/29/21 | CMM | Draft motion to approve sale of Layton property; Draft motion to dismiss Oberhansley lawsuit with prejudice; Prepare exhibits for the same | 4.70 | 1,057.50 |

Invoice: 897539 July 15, 2021
Rust Rare Coin Receivership Client: 176430
Asset Analysis & Recovery Matter: 2

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 6/29/21 | DZ | Edit deposition tracking spreadsheet with Dearden II group deposition info; Review deposition files for completeness | .30 | 45.00 |
| 6/30/21 | DEB | Communications re revised scheduling order; Continue drafting reply in support of motion for partial summary judgment | 4.50 | 1,462.50 |
| 6/30/21 | MTH | Review correspondence from opposing counsel; Review settlement agreement | .20 | 64.00 |
| 6/30/21 | MJB | (Hafen v. Howell) Review correspondence (0.1); Correspond with Cynthia Love (0.1) | .20 | 63.00 |
| 6/30/21 | EWB | Redact sensitive information from produced documents | 4.30 | 924.50 |
| 6/30/21 | DZ | Search for emails re hard drive submitted in Evans claw back case; Coordinate with Dan Barnett re Evans productions and hard drive | .20 | 30.00 |

**TOTAL PROFESSIONAL SERVICES** **$ 295,153.50**

**SUMMARY OF PROFESSIONAL SERVICES**

| Name | Rate | Hours | Total |
|---|---|---|---|
| Kenneth B Tillou | 455.00 | 1.40 | 637.00 |
| Joseph M R Covey | 335.00 | 59.80 | 20,033.00 |
| Daniel E Barnett | 325.00 | 155.00 | 50,375.00 |
| Rodger M Burge | 325.00 | 144.80 | 47,060.00 |
| Michael T Hoppe | 320.00 | 24.10 | 7,712.00 |
| Matthew J Ball | 315.00 | 37.90 | 11,938.50 |
| Jeffery A Balls | 285.00 | 5.50 | 1,567.50 |
| Cynthia D Love | 250.00 | 109.10 | 27,275.00 |
| David P Mooers-Putzer | 250.00 | 250.00 | 62,500.00 |
| Walter O Peterson | 230.00 | 61.60 | 14,168.00 |
| Emma W Balls | 215.00 | 80.00 | 17,200.00 |
| Claire M McGuire | 225.00 | 127.70 | 28,732.50 |
| Susan Bailey - Paralegal | 150.00 | 2.70 | 405.00 |
| Daniel Zarkou - Paralegal | 150.00 | 37.00 | 5,550.00 |
| **TOTALS** | | **1,096.60** | **$ 295,153.50** |

**COSTS ADVANCED**

| Date | Description | Amount |
|---|---|---|
| 2/12/21 | Metro National Title - Title Search on land located in Bountiful, UT (Sargent II Group) | 1,000.00 |
| 6/14/21 | CitiCourt - Deposition Transcripts of Leslie & Gretchen Howell | 936.30 |
| 6/19/21 | GoDaddy.com | 8.47 |

**TOTAL COSTS ADVANCED** **$ 1,944.77**

**TOTAL THIS INVOICE** **$ 297,098.27**

PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

July 15, 2021

Invoice: 897539
Client: 176430
Matter: 2

# REMITTANCE ADVICE

**RE: Asset Analysis & Recovery**

**BALANCE DUE THIS INVOICE** **$ 297,098.27**

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

To Pay by Credit Card:

__Visa __Mastercard __Discover __Amex
Credit Card # _____
Expiration Date _____/_____
Security Code # _____
Name on Account: _____
Billing Address: _____
_____
Amount: $_____
**Payments accepted by phone (801) 532-7840**

ACH Payment Instructions
ABA Routing #: 124001545
Account #: 912454114
**Please reference your invoice # 897539**

Online Payment: www.parrbrown.com

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

August 16, 2021

Invoice: 897540
Client: 176430
Matter: 3

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Disposition of Assets**

| | |
|---|---|
| Professional Services | $ 12,615.50 |
| Total Costs Advanced | $ 5.47 |
| **TOTAL THIS INVOICE** | **$ 12,620.97** |

Invoice: 897540 August 16, 2021
Rust Rare Coin Receivership Client: 176430
Disposition of Assets Matter: 3

**PROFESSIONAL SERVICES RENDERED**

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 4/12/21 | CMM | Review second appraisal for Layton property; Draft email about invoice and valuation to team selling property; Provide guidance on hourly wage worker claim for Daniel Zarkou | .50 | 112.50 |
| 4/13/21 | JMC | Correspond with Dan Nelson and Jon Hafen re listing of Layton property and related issues | .50 | 167.50 |
| 4/14/21 | JMC | Correspond with Dan Nelson re Layton property listing | .30 | 100.50 |
| 4/15/21 | JMC | Review new appraisal for Layton; Correspond with Dan Nelson re the same | .30 | 100.50 |
| 4/21/21 | JMC | Correspond with Jon Hafen and Dan Nelson re purchase process for Layton property; Review various offers | 1.10 | 368.50 |
| 4/22/21 | JMC | Correspond with Dan Nelson re sale proceeds on Layton and offers | .60 | 201.00 |
| 5/03/21 | JMC | Review and analyze numerous offers on Layton property; Correspond with Dan Nelson re the same | 2.10 | 703.50 |
| 5/04/21 | JMC | Correspond with Dan Nelson and Jon Hafen re offers on Layton property and related issues | .40 | 134.00 |
| 5/05/21 | JMC | Correspond with Dan Nelson and Jon Hafen re offers on Layton property; Review new offers | 1.20 | 402.00 |
| 5/06/21 | JMC | Correspond with Dan Nelson re Layton property | .30 | 100.50 |
| 5/07/21 | JMC | Correspond with Dan Nelson re offers | .30 | 100.50 |
| 5/10/21 | JMC | Correspond with Dan Nelson re water issues on Layton property | .10 | 33.50 |
| 5/19/21 | JMC | Correspond with Jon Hafen and Dan Nelson re sale of Layton property and offers | .30 | 100.50 |
| 5/20/21 | JMC | Correspond with Jon Hafen and Dan Nelson re sale of Layton property; Review addendum to sell of property; Review and draft addendum #1 to purchase contract | 2.30 | 770.50 |
| 5/24/21 | WOP | Call with artist re ownership of music; Review agreements and payment records re the same | 2.10 | 483.00 |
| 5/25/21 | JMC | Correspond with Jon Hafen re sale of Layton Property | .20 | 67.00 |
| 5/26/21 | JMC | Correspond with Jon Hafen and Dan Nelson re Symphony counter-offer on Layton property; Coordinate signature of counter-offer | .50 | 167.50 |
| 5/28/21 | JMC | Correspond with Dan Nelson and Jon Hafen re final addendum to Layton purchase contract; Coordinate execution of agreement | 1.20 | 402.00 |
| 6/04/21 | JMC | Correspond with Claire McGuire re motion to sell Layton property; Correspond with Dan Nelson re sale of Layton property; Review and revise escrow agreement for Layton property; Correspond with the title company re changes; Coordinate notice of sale for the Layton property | 2.90 | 971.50 |
| 6/04/21 | CMM | Review legal notice email for sale of the Layton property; Review claims for Jonathan Hafen approval; Discuss disparities in claims with Daniel Zarkou; Review notice of real property sale and previous motions to approve sale; Draft motion in anticipation of the running of the notice period | 6.60 | 1,485.00 |

PARR BROWN GEE & LOVELESS

Invoice: 897540 August 16, 2021
Rust Rare Coin Receivership Client: 176430
Disposition of Assets Matter: 3

| Date | Tkpr | Description | Hours | Amount |
|---|---|---|---|---|
| 6/07/21 | JMC | Correspond with newspaper re notice of sale; Correspond with Dan Nelson re timing of Layton sale and related issues | .60 | 201.00 |
| 6/07/21 | WOP | Review settlement agreement and payment history of artist looking to purchase music | 1.10 | 253.00 |
| 6/07/21 | CMM | Prepare motion for approval of sales price for West Gordon Ave property in Layton; Review appraisals and notices about the same; Review claims for Jonathan Hafen approval and draft summaries for the same; Discuss claims packaging project with Cynthia Love | 4.10 | 922.50 |
| 6/08/21 | WOP | Review settlement documents for Angler's Roost; Review capital account balance; Review operating agreement; Correspond with seller's counsel re same | 3.10 | 713.00 |
| 6/09/21 | WOP | Correspond with counsel for Angler's Roost; Correspond with BRG re sale of Angler's Roost | .90 | 207.00 |
| 6/10/21 | JMC | Correspond with Dan Nelson re sale of Layton property and higher and better offers | .40 | 134.00 |
| 6/10/21 | MSA | Multiple correspondence with attorney team re sale of digital entertainment assets; Analyze legal issues re same; Review prior correspondences and documents re same | .70 | 185.50 |
| 6/10/21 | WOP | Call with the owner of Anglers Roost re status of K-1; Meet with Kathy Bates re same; Correspond with BRG | 2.10 | 483.00 |
| 6/11/21 | WOP | Call with seller; Review settlement statement; Review K-1; Correspond with BRG re same; Coordinate signatures from receiver | 2.50 | 575.00 |
| 6/15/21 | JMC | Review 15 day notice on Layton property; Correspond with issuing officer; Correspond with Dan Nelson re the same | .40 | 134.00 |
| 6/15/21 | WOP | Review 2019 K-1; Correspond with BRG re Anglers Roost; Review final disbursement; Correspond with Kathy re same | .90 | 207.00 |
| 6/16/21 | JMC | Correspond with Dan Nelson re issues involving sale of Layton property | .90 | 301.50 |
| 6/22/21 | JMC | Correspond with Dan Nelson and Claire McGuire re motion to approve sale of Layton property and competing bids | .40 | 134.00 |
| 6/22/21 | CMM | Finalize motion to approve sale of Layton property; Prepare exhibits for the same; Phone call with Dan Nelson about other offers and utilities issues | 1.90 | 427.50 |
| 6/24/21 | JMC | Review and revise motion to sell Layton property; Examine liens of creditors, title reports and related issues; Correspond with Dan Nelson re the same | 1.00 | 335.00 |
| 6/29/21 | WOP | Review Anglers Roost documents; Upload the same to the matter | .70 | 161.00 |
| 6/30/21 | JMC | Correspond with Steve McGrath re sale of the Layton property and reservations of right with existing liens | .60 | 201.00 |
| 6/30/21 | WOP | Review motion to sell Layton property | .30 | 69.00 |
| | | **TOTAL PROFESSIONAL SERVICES** | | **$ 12,615.50** |

PARR BROWN GEE & LOVELESS

Invoice: 897540
Rust Rare Coin Receivership
Disposition of Assets

August 16, 2021
Client: 176430
Matter: 3

**SUMMARY OF PROFESSIONAL SERVICES**

| Name | Rate | Hours | Total |
|---|---|---|---|
| Joseph M R Covey | 335.00 | 18.90 | 6,331.50 |
| Michael S Anderson | 265.00 | .70 | 185.50 |
| Walter O Peterson | 230.00 | 13.70 | 3,151.00 |
| Claire M McGuire | 225.00 | 13.10 | 2,947.50 |
| **TOTALS** | | **46.40** | **$ 12,615.50** |

**COSTS ADVANCED**

| Date | Description | Amount |
|---|---|---|
| 6/07/21 | SimpleCertified Mail | 5.47 |

**TOTAL COSTS ADVANCED** **$ 5.47**

**TOTAL THIS INVOICE** **$ 12,620.97**

PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

August 16, 2021

Invoice: 897540
Client: 176430
Matter: 3

# REMITTANCE ADVICE

**RE: Disposition of Assets**

**BALANCE DUE THIS INVOICE** **$ 12,620.97**

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

To Pay by Credit Card:

__Visa __Mastercard __Discover __Amex
Credit Card # _____
Expiration Date _____/_____
Security Code # _____
Name on Account: _____
Billing Address: _____
_____
Amount: $_____
**Payments accepted by phone (801) 532-7840**

ACH Payment Instructions
ABA Routing #: 124001545
Account #: 912454114
**Please reference your invoice # 897540**

Online Payment: www.parrbrown.com

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

BRG

# INVOICE

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

**Via Email: jhafen@parrbrown.com**

August 4, 2021
Client-Matter: 16222-25457
Invoice #: 117983
Tax ID # 27-1451273

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

Services Rendered From April 1, 2021 Through June 30, 2021

| | | |
|---|---|---|
| Professional Services | $ 74,345.50 | USD |
| Voluntary Reduction | (1,267.50) | |
| Expenses Incurred | 87.81 | |
| **CURRENT CHARGES** | **$ 73,165.81** | **USD** |

**PAYMENT IS DUE BY September 3, 2021**

Please direct questions regarding this invoice to: Jeff Shaw at 801.364.6233 or jshaw@thinkbrg.com.

**Please remit wire/ACH payment to:**
Bank Name: PNC BANK, N.A.
SWIFT: PNCCUS33
ABA #: 031207607
Account Name: BERKELEY RESEARCH GROUP, LLC
Account #: 8026286672
Reference: 117983 Q2 Fee App

Remittance advice to be sent 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

****Due to COVID-19, we are kindly requesting all payments to be made electronically.**

BRG 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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Services Rendered From April 1, 2021 Through June 30, 2021

**PROFESSIONAL SERVICES**

| | Rate | Hours | Amount |
|---|---|---|---|
| **Managing Director** | | | |
| Vernon Calder | 400.00 | 5.90 | 2,360.00 |
| Ray Strong | 375.00 | 69.10 | 25,912.50 |
| **Associate Director** | | | |
| Leif Larsen | 325.00 | 14.10 | 4,582.50 |
| Leif Larsen | 0.00 | 0.60 | N/C |
| **Senior Managing Consultant** | | | |
| Jeffrey Shaw | 325.00 | 121.00 | 39,325.00 |
| Jeffrey Shaw | 0.00 | 3.30 | N/C |
| **Senior Associate** | | | |
| Christina Tergevorkian | 220.00 | 2.50 | 550.00 |
| **Case Assistant** | | | |
| Evelyn Perry | 145.00 | 2.40 | 348.00 |
| **Total Professional Services** | | **218.90** | **73,078.00** |

**EXPENSES**

| | |
|---|---|
| Data Retrieval | 87.81 |
| **Total Expenses** | **87.81** |

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**SUMMARY BY TASK CODE**

| Task Code | Description | Hours | Amount |
|---|---|---|---|
| 200 | Asset Identification, Preservation, and Liquidation | 0.30 | 97.50 |
| 350 | Net Winner / Claims Analysis | 69.70 | 23,337.50 |
| 500 | Recovery Litigation | 127.40 | 43,795.50 |
| 600 | Tax Compliance & Analysis | 1.70 | 567.50 |
| 610 | Income Tax Preparation | 15.90 | 5,280.00 |
| 950 | Fee Application Preparation & Hearing | 3.90 | 0.00 |
| **Total Professional Services** | | **218.90** | **73,078.00** |

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Services Rendered From April 1, 2021 Through June 30, 2021

**DETAIL OF PROFESSIONAL SERVICES**

| Date | Name | Description | Hours | Rate | Amount |
|---|---|---|---|---|---|
| **Task Code: 200 - Asset Identification, Preservation, and Liquidation** | | | | | |
| 06/09/21 | Jeffrey Shaw | Reviewed sale of Anglers Roost interest and prepared email regarding the same. | 0.30 | 325.00 | 97.50 |
| | | **Total for Task Code 200** | **0.30** | | **97.50** |
| **Task Code: 350 - Net Winner / Claims Analysis** | | | | | |
| 04/02/21 | Ray Strong | Attended call with counsel to discuss [redacted] settlement issues and tax return preparation. | 0.90 | 375.00 | 337.50 |
| 04/07/21 | Vernon Calder | Reviewed proposed term of settlement with [redacted] and provided comments regarding tax issues. | 0.90 | 400.00 | 360.00 |
| 04/08/21 | Vernon Calder | Email correspondence with accountants regarding filing IRS Protective Claims. | 0.40 | 400.00 | 160.00 |
| 04/08/21 | Ray Strong | Analyzed revised settlement offer sent by [redacted] counsel. | 0.20 | 375.00 | 75.00 |
| 04/08/21 | Ray Strong | Discussed revised [redacted] settlement offer with counsel. | 0.30 | 375.00 | 112.50 |
| 04/12/21 | Vernon Calder | Review proposed [redacted] Form 843 to be submitted to IRS in conjunction with Amended IRS Form 706, Estate Tax Return. | 1.00 | 400.00 | 400.00 |
| 04/12/21 | Jeffrey Shaw | Analyzed [redacted] silver account activity and prepared calculations per counsel request. | 3.40 | 325.00 | 1,105.00 |
| 04/12/21 | Jeffrey Shaw | Analyzed [redacted] group activity in preparation for call with counsel. | 0.50 | 325.00 | 162.50 |
| 04/13/21 | Jeffrey Shaw | Prepared for call with counsel regarding [redacted] group. | 0.80 | 325.00 | 260.00 |
| 04/13/21 | Jeffrey Shaw | Evaluated [redacted] silver account activity and support. | 1.30 | 325.00 | 422.50 |
| 04/13/21 | Jeffrey Shaw | Spoke with counsel regarding [redacted] group activity. | 0.90 | 325.00 | 292.50 |

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| Date | Name | Description | Hours | Rate | Amount |
|---|---|---|---|---|---|
| 04/13/21 | Jeffrey Shaw | Prepared and submitted schedules and coordinated meeting regarding [redacted] group. | 0.30 | 325.00 | 97.50 |
| 04/13/21 | Ray Strong | Analyzed [redacted] settlement and tax refund issues. | 0.50 | 375.00 | 187.50 |
| 04/14/21 | Jeffrey Shaw | Analyzed [redacted] activity and support. | 0.50 | 325.00 | 162.50 |
| 04/15/21 | Jeffrey Shaw | Prepared analysis of [redacted] investment activity. | 4.00 | 325.00 | 1,300.00 |
| 04/15/21 | Jeffrey Shaw | Call with counsel regarding [redacted] group. | 1.00 | 325.00 | 325.00 |
| 04/19/21 | Jeffrey Shaw | Call with counsel to discuss [redacted] account activity. | 0.50 | 325.00 | 162.50 |
| 04/19/21 | Jeffrey Shaw | Responded and follow-up with counsel regarding net winner/claims analysis. | 0.30 | 325.00 | 97.50 |
| 04/20/21 | Jeffrey Shaw | Prepared email regarding [redacted] activity. | 0.30 | 325.00 | 97.50 |
| 04/20/21 | Jeffrey Shaw | Analyzed activity and support for [redacted]. | 1.90 | 325.00 | 617.50 |
| 04/21/21 | Jeffrey Shaw | Attended meeting with counsel and [redacted] group. | 1.90 | 325.00 | 617.50 |
| 04/21/21 | Ray Strong | Analyzed [redacted] settlement issues and IRS tax refund. | 0.40 | 375.00 | 150.00 |
| 04/22/21 | Vernon Calder | Reviewed proposed amended Estate tax return for [redacted]. | 1.50 | 400.00 | 600.00 |
| 04/22/21 | Ray Strong | Analyzed draft tax documents sent by [redacted] regarding IRS tax return and amended tax return. | 0.70 | 375.00 | 262.50 |
| 04/26/21 | Jeffrey Shaw | Reviewed settlement agreements and updated net winner summary. | 0.30 | 325.00 | 97.50 |
| 04/27/21 | Vernon Calder | Reviewed final draft of [redacted] settlement agreement. | 0.30 | 400.00 | 120.00 |
| 04/30/21 | Ray Strong | Discussed [redacted] tax refund and settlement issues with counsel. | 0.20 | 375.00 | 75.00 |
| 05/05/21 | Jeffrey Shaw | Reviewed [redacted] activity and responded to counsel inquiry. | 1.10 | 325.00 | 357.50 |
| 05/06/21 | Jeffrey Shaw | Analyzed [redacted] group activity and support per counsel inquiry. | 1.10 | 325.00 | 357.50 |
| 05/06/21 | Jeffrey Shaw | Reviewed settlement agreements and updated net winner summary schedule. | 0.30 | 325.00 | 97.50 |

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| Date | Name | Description | Hours | Rate | Amount |
|---|---|---|---|---|---|
| 05/07/21 | Jeffrey Shaw | Analyzed [redacted] group activity and support and prepared email to counsel regarding findings. | 1.50 | 325.00 | 487.50 |
| 05/10/21 | Jeffrey Shaw | Reviewed [redacted] activity and prepared summary schedule of possible contributions. | 0.80 | 325.00 | 260.00 |
| 05/10/21 | Jeffrey Shaw | Analyzed [redacted] activity and support and responded to counsel questions. | 2.50 | 325.00 | 812.50 |
| 05/12/21 | Jeffrey Shaw | Prepared summary schedule of possible investment activity for [redacted]. | 1.50 | 325.00 | 487.50 |
| 05/13/21 | Jeffrey Shaw | Prepared for call regarding [redacted] group. | 0.30 | 325.00 | 97.50 |
| 05/13/21 | Jeffrey Shaw | Call with counsel regarding [redacted] group claims. | 0.60 | 325.00 | 195.00 |
| 05/13/21 | Jeffrey Shaw | Prepared and submitted responses to counsel questions regarding [redacted] group. | 0.30 | 325.00 | 97.50 |
| 05/13/21 | Jeffrey Shaw | Prepared summary schedule of possible investment activity for [redacted]. | 2.20 | 325.00 | 715.00 |
| 05/14/21 | Jeffrey Shaw | Discussion with counsel regarding [redacted] activity. | 0.20 | 325.00 | 65.00 |
| 05/14/21 | Jeffrey Shaw | Continued to prepare summary schedule of possible investment activity for [redacted]. | 1.50 | 325.00 | 487.50 |
| 05/19/21 | Jeffrey Shaw | Analyzed information and submitted findings related to [redacted] claim per counsel request. | 0.50 | 325.00 | 162.50 |
| 05/20/21 | Jeffrey Shaw | Analyzed [redacted] investment activity. | 0.30 | 325.00 | 97.50 |
| 05/21/21 | Jeffrey Shaw | Examined [redacted] production. | 3.00 | 325.00 | 975.00 |
| 05/24/21 | Jeffrey Shaw | Follow-up regarding status of settlement agreement. | 0.20 | 325.00 | 65.00 |
| 05/24/21 | Jeffrey Shaw | Coordinated call regarding [redacted] group. | 0.10 | 325.00 | 32.50 |
| 05/26/21 | Jeffrey Shaw | Analyzed [redacted] activity and support. | 4.90 | 325.00 | 1,592.50 |
| 05/27/21 | Jeffrey Shaw | Reviewed settlement agreements and updated net winner summary schedule. | 0.30 | 325.00 | 97.50 |

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| Date | Name | Description | Hours | Rate | Amount |
|---|---|---|---|---|---|
| 05/28/21 | Jeffrey Shaw | Correspondence regarding [redacted] activity/production. | 0.10 | 325.00 | 32.50 |
| 06/01/21 | Vernon Calder | Reviewed [redacted] settlement to verify correct IRS forms to be completed in order for any tax refund to be sent directly to the Receiver. | 0.10 | 400.00 | 40.00 |
| 06/01/21 | Jeffrey Shaw | Prepared for call regarding [redacted] group. | 0.40 | 325.00 | 130.00 |
| 06/01/21 | Jeffrey Shaw | Attended call with counsel regarding [redacted] group. | 1.40 | 325.00 | 455.00 |
| 06/01/21 | Ray Strong | Attended call with Receiver, counsel, and BRG team regarding settlement agreement with [redacted] family. | 0.40 | 375.00 | 150.00 |
| 06/01/21 | Ray Strong | Analyzed draft settlement agreement prepared by counsel related to [redacted] family. | 0.60 | 375.00 | 225.00 |
| 06/01/21 | Ray Strong | Discussed net winner settlement issues with BRG team. | 0.10 | 375.00 | 37.50 |
| 06/02/21 | Jeffrey Shaw | Prepared for [redacted] meeting. | 1.30 | 325.00 | 422.50 |
| 06/02/21 | Jeffrey Shaw | Attended meetings with counsel for [redacted] and [redacted] group. | 3.20 | 325.00 | 1,040.00 |
| 06/03/21 | Jeffrey Shaw | Analyzed [redacted] activity and support and prepared schedule per counsel request. | 1.80 | 325.00 | 585.00 |
| 06/03/21 | Jeffrey Shaw | Discussion with counsel regarding [redacted] metals activity. | 0.30 | 325.00 | 97.50 |
| 06/03/21 | Jeffrey Shaw | Analyzed [redacted] support and data and prepared schedule. | 2.60 | 325.00 | 845.00 |
| 06/04/21 | Jeffrey Shaw | Reviewed investment activity and prepared [redacted] schedule and email to counsel regarding the same. | 2.30 | 325.00 | 747.50 |
| 06/04/21 | Jeffrey Shaw | Reviewed settlement agreements and updated net winner summary schedule. | 0.40 | 325.00 | 130.00 |
| 06/09/21 | Jeffrey Shaw | Analyzed Hashimoto calculation and finalized valuation for [redacted] metals and prepared email regarding the same. | 2.30 | 325.00 | 747.50 |
| 06/09/21 | Ray Strong | Analyzed case documents in preparation for deposition on [redacted] matter. | 3.10 | 375.00 | 1,162.50 |

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| Date | Name | Description | Hours | Rate | Amount |
|---|---|---|---|---|---|
| 06/10/21 | Jeffrey Shaw | Reviewed and responded to emails regarding [redacted] group. | 0.90 | 325.00 | 292.50 |
| | | **Total for Task Code 350** | **69.70** | | **23,337.50** |
| **Task Code: 500 - Recovery Litigation** | | | | | |
| 04/01/21 | Jeffrey Shaw | Prepared declaration for Kennedy litigation. | 1.50 | 325.00 | 487.50 |
| 04/05/21 | Jeffrey Shaw | Continued to prepare declaration for Kennedy litigation. | 1.30 | 325.00 | 422.50 |
| 04/05/21 | Ray Strong | Analyzed draft settlement correspondence prepared by Receiver counsel and provided comments. | 0.20 | 375.00 | 75.00 |
| 04/06/21 | Jeffrey Shaw | Prepared Kennedy declaration, schedules and exhibits. | 6.70 | 325.00 | 2,177.50 |
| 04/06/21 | Ray Strong | Reviewed declaration required for recovery litigation in Kennedy matter. | 0.20 | 375.00 | 75.00 |
| 04/07/21 | Jeffrey Shaw | Reviewed, finalized and submitted Kennedy declaration to counsel. | 1.60 | 325.00 | 520.00 |
| 04/14/21 | Jeffrey Shaw | Participated in call regarding status of various case issues. | 0.90 | 325.00 | 292.50 |
| 04/14/21 | Ray Strong | Discussed status and assignments on recovery litigation with BRG team. | 0.90 | 375.00 | 337.50 |
| 04/19/21 | Jeffrey Shaw | Followed-up regarding status of L Rust litigation. | 0.20 | 325.00 | 65.00 |
| 04/24/21 | Jeffrey Shaw | Reviewed opposing expert report in Evans litigation. | 1.00 | 325.00 | 325.00 |
| 04/28/21 | Jeffrey Shaw | Participated in litigation status call. | 0.50 | 325.00 | 162.50 |
| 04/28/21 | Jeffrey Shaw | Coordinated call regarding litigation matters. | 0.30 | 325.00 | 97.50 |
| 04/28/21 | Jeffrey Shaw | Reviewed opposing expert report for Evans litigation. | 2.60 | 325.00 | 845.00 |
| 04/28/21 | Ray Strong | Discussed status of recovery litigation and case issue with BRG team. | 0.50 | 375.00 | 187.50 |
| 04/29/21 | Jeffrey Shaw | Analyzed Kirkham settlement offer and activity. | 1.50 | 325.00 | 487.50 |
| 04/29/21 | Jeffrey Shaw | Prepared for call with counsel regarding Evans litigation. | 0.20 | 325.00 | 65.00 |
| 04/29/21 | Jeffrey Shaw | Participated in call with counsel regarding Evans litigation. | 1.40 | 325.00 | 455.00 |

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| Date | Name | Description | Hours | Rate | Amount |
|---|---|---|---|---|---|
| 04/29/21 | Jeffrey Shaw | Spoke with BRG regarding invoice detail / issues related to Kirkham. | 0.70 | 325.00 | 227.50 |
| 04/29/21 | Jeffrey Shaw | Prepared correspondence to counsel regarding Kirkham settlement offer. | 0.50 | 325.00 | 162.50 |
| 04/29/21 | Ray Strong | Discussed clawback litigation issues relating to Kirkham transactions with BRG team. | 0.80 | 375.00 | 300.00 |
| 04/30/21 | Jeffrey Shaw | Analyzed Kirkham activity and support and prepared comments regarding settlement offer. | 2.60 | 325.00 | 845.00 |
| 05/03/21 | Jeffrey Shaw | Correspondence with counsel regarding Kirkham litigation. | 0.40 | 325.00 | 130.00 |
| 05/04/21 | Jeffrey Shaw | Discussion with counsel regarding Kirkham settlement and activity. | 0.70 | 325.00 | 227.50 |
| 05/10/21 | Jeffrey Shaw | Reviewed and responded to email regarding Howell litigation. | 0.20 | 325.00 | 65.00 |
| 05/10/21 | Jeffrey Shaw | Reviewed settlement correspondence from counsel regarding Kirkham litigation. | 0.50 | 325.00 | 162.50 |
| 05/10/21 | Jeffrey Shaw | Analyzed Kirkham activity and support and provided comments regarding email to Receiver. | 1.80 | 325.00 | 585.00 |
| 05/12/21 | Jeffrey Shaw | Participated in Rust litigation status call. | 0.50 | 325.00 | 162.50 |
| 05/12/21 | Ray Strong | Discussed status of net winner litigation with BRG team. | 0.40 | 375.00 | 150.00 |
| 05/14/21 | Jeffrey Shaw | Reviewed summary judgment motion for Evan's litigation. | 0.50 | 325.00 | 162.50 |
| 05/17/21 | Jeffrey Shaw | Discussion regarding Rust litigation issues. | 0.50 | 325.00 | 162.50 |
| 05/17/21 | Jeffrey Shaw | Reviewed Howell activity, including deposition outline and exhibits. | 2.90 | 325.00 | 942.50 |
| 05/17/21 | Jeffrey Shaw | Call with counsel regarding Howell litigation. | 0.60 | 325.00 | 195.00 |
| 05/17/21 | Ray Strong | Discussed status of net winner litigation with Receiver counsel. | 0.50 | 375.00 | 187.50 |
| 05/17/21 | Ray Strong | Discussed status of Howell/Evans litigation with BRG team. | 0.50 | 375.00 | 187.50 |
| 05/18/21 | Jeffrey Shaw | Discussion with counsel regarding Kirkham activity. | 0.40 | 325.00 | 130.00 |

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| Date | Name | Description | Hours | Rate | Amount |
|---|---|---|---|---|---|
| 05/18/21 | Ray Strong | Discussed status of net winner litigation with Receiver counsel. | 0.50 | 375.00 | 187.50 |
| 05/27/21 | Jeffrey Shaw | Followed-up regarding status of litigation. | 0.20 | 325.00 | 65.00 |
| 06/01/21 | Jeffrey Shaw | Reviewed litigation status/issues. | 0.20 | 325.00 | 65.00 |
| 06/01/21 | Jeffrey Shaw | Reviewed files and spoke with staff regarding summary for expert deposition preparation. | 0.50 | 325.00 | 162.50 |
| 06/02/21 | Evelyn Perry | Prepared summary schedule of total hours and fees by task code in connection with preparation for expert deposition. | 1.50 | 145.00 | 217.50 |
| 06/03/21 | Evelyn Perry | Prepared summary schedule of total hours and fees by task code in connection with preparation for expert deposition. | 0.90 | 145.00 | 130.50 |
| 06/03/21 | Jeffrey Shaw | Reviewed Howell deposition materials. | 2.30 | 325.00 | 747.50 |
| 06/03/21 | Jeffrey Shaw | Followed-up regarding litigation status. | 0.20 | 325.00 | 65.00 |
| 06/03/21 | Jeffrey Shaw | Followed-up regarding Howell depositions. | 0.20 | 325.00 | 65.00 |
| 06/04/21 | Jeffrey Shaw | Prepared for Howell depositions. | 0.70 | 325.00 | 227.50 |
| 06/04/21 | Jeffrey Shaw | Attended depositions of Les & Gretchen Howell. | 4.50 | 325.00 | 1,462.50 |
| 06/04/21 | Ray Strong | Analyzed case documentation in preparation for deposition in Howell matter. | 3.20 | 375.00 | 1,200.00 |
| 06/07/21 | Ray Strong | Analyzed case documents in preparation for deposition on Howell matter. | 2.80 | 375.00 | 1,050.00 |
| 06/08/21 | Jeffrey Shaw | Analyzed Dearden activity and support and provided requested documents to counsel. | 1.10 | 325.00 | 357.50 |
| 06/08/21 | Ray Strong | Analyzed case documents in preparation for deposition on Howell matter. | 2.70 | 375.00 | 1,012.50 |
| 06/10/21 | Jeffrey Shaw | Discussion regarding status of Howell litigation. | 0.50 | 325.00 | 162.50 |
| 06/10/21 | Ray Strong | Analyzed case documents in preparation for deposition on Howell matter. | 0.90 | 375.00 | 337.50 |

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|---|---|---|---|---|---|
| 06/11/21 | Jeffrey Shaw | Discussion and email regarding Howell litigation. | 0.30 | 325.00 | 97.50 |
| 06/11/21 | Ray Strong | Analyzed case documents in preparation for deposition on Howell matter. | 2.70 | 375.00 | 1,012.50 |
| 06/12/21 | Ray Strong | Compiled case information for deposition preparation on Howell matter. | 2.70 | 375.00 | 1,012.50 |
| 06/13/21 | Ray Strong | Compiled case information for deposition preparation on Howell matter. | 3.50 | 375.00 | 1,312.50 |
| 06/14/21 | Jeffrey Shaw | Analyzed Howell activity and support in preparation for deposition. | 3.50 | 325.00 | 1,137.50 |
| 06/14/21 | Jeffrey Shaw | Responded to counsel inquiry regarding Dearden activity. | 0.20 | 325.00 | 65.00 |
| 06/14/21 | Ray Strong | Analyzed Ponzi declaration exhibits in preparation for deposition in Howell matter. | 2.10 | 375.00 | 787.50 |
| 06/14/21 | Ray Strong | Analyzed Ponzi declaration in preparation for deposition in Howell matter. | 3.50 | 375.00 | 1,312.50 |
| 06/15/21 | Jeffrey Shaw | Prepared for meeting with counsel regarding Howell litigation. | 1.30 | 325.00 | 422.50 |
| 06/15/21 | Jeffrey Shaw | Met with Receiver and counsel regarding Howell litigation. | 3.40 | 325.00 | 1,105.00 |
| 06/15/21 | Ray Strong | Analyzed Ponzi declaration in preparation for deposition in Howell matter. | 4.30 | 375.00 | 1,612.50 |
| 06/15/21 | Ray Strong | Met with council in preparation for deposition in Howell matter. | 3.40 | 375.00 | 1,275.00 |
| 06/16/21 | Jeffrey Shaw | Reviewed Dearden group activity and prepared email regarding findings per counsel inquiry. | 1.30 | 325.00 | 422.50 |
| 06/16/21 | Jeffrey Shaw | Coordinated meeting regarding Taylor litigation. | 0.20 | 325.00 | 65.00 |
| 06/21/21 | Ray Strong | Analyzed declaration prepared in Oberhansly matter for deposition preparation in Howell matter. | 1.20 | 375.00 | 450.00 |

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|---|---|---|---|---|---|
| 06/22/21 | Ray Strong | Analyzed declaration exhibits prepared in Oberhansly matter for deposition preparation in Howell matter. | 1.30 | 375.00 | 487.50 |
| 06/22/21 | Ray Strong | Analyzed cash receipt and disbursement database activity relating to litigation recoveries. | 3.10 | 375.00 | 1,162.50 |
| 06/23/21 | Jeffrey Shaw | Analyzed Dearden activity and responded to counsel inquiry. | 1.50 | 325.00 | 487.50 |
| 06/23/21 | Jeffrey Shaw | Attended virtual deposition of Gaylen Rust in Howell litigation. | 0.80 | 325.00 | 260.00 |
| 06/23/21 | Jeffrey Shaw | Reviewed exhibits from G Rust deposition. | 0.80 | 325.00 | 260.00 |
| 06/23/21 | Ray Strong | Analyzed point of sale transaction activity relating to Ponzi analysis. | 1.30 | 375.00 | 487.50 |
| 06/23/21 | Ray Strong | Discussed deposition preparation with counsel on Howell matter. | 0.30 | 375.00 | 112.50 |
| 06/24/21 | Jeffrey Shaw | Prepared for meeting with counsel on Taylor litigation. | 1.30 | 325.00 | 422.50 |
| 06/24/21 | Jeffrey Shaw | Met with counsel regarding Taylor Group and other litigation matters. | 2.00 | 325.00 | 650.00 |
| 06/24/21 | Ray Strong | Analyzed declaration appendix D relating to FY 2010 Ponzi analysis for deposition in Howell matter. | 2.10 | 375.00 | 787.50 |
| 06/24/21 | Ray Strong | Analyzed declaration appendix C relating to FY 2009 Ponzi analysis for deposition in Howell matter. | 2.20 | 375.00 | 825.00 |
| 06/24/21 | Ray Strong | Analyzed declaration appendix B relating to FY 2008 Ponzi analysis for deposition in Howell matter. | 2.10 | 375.00 | 787.50 |
| 06/24/21 | Christina Tergevorkian | Reviewed POS COGS and Sales activity in connection with expert deposition in Howell matter. | 0.70 | 220.00 | 154.00 |
| 06/24/21 | Christina Tergevorkian | Reviewed QuickBooks files for R Legacy Entertainment, R Legacy Investments, R Legacy Racing, and Legacy Music Alliance in connection with expert deposition in Howell matter. | 1.80 | 220.00 | 396.00 |
| 06/25/21 | Jeffrey Shaw | Discussion regarding Howell activity and litigation status. | 1.10 | 325.00 | 357.50 |

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| Date | Name | Description | Hours | Rate | Amount |
|---|---|---|---|---|---|
| 06/25/21 | Ray Strong | Analyzed declaration appendix D relating to FY 2010 Ponzi analysis for deposition in Howell matter. | 1.30 | 375.00 | 487.50 |
| 06/25/21 | Ray Strong | Analyzed declaration appendix C relating to FY 2009 Ponzi analysis for deposition in Howell matter. | 1.30 | 375.00 | 487.50 |
| 06/25/21 | Ray Strong | Analyzed declaration appendix B relating to FY 2008 Ponzi analysis for deposition in Howell matter. | 1.30 | 375.00 | 487.50 |
| 06/25/21 | Ray Strong | Analyzed QuickBooks data for RRC and related affiliates for deposition in Howell matter. | 2.20 | 375.00 | 825.00 |
| 06/25/21 | Ray Strong | Discussed deposition preparation with counsel on Howell matter. | 1.00 | 375.00 | 375.00 |
| 06/25/21 | Ray Strong | Discussed deposition preparation with BRG team on Howell matter. | 1.00 | 375.00 | 375.00 |
| 06/28/21 | Ray Strong | Analyzed case documents in preparation for deposition in Howell matter. | 1.20 | 375.00 | 450.00 |
| 06/29/21 | Ray Strong | Analyzed case documents in preparation for deposition in Howell matter. | 1.30 | 375.00 | 487.50 |
| 06/30/21 | Jeffrey Shaw | Discussion regarding status of various litigations. | 0.20 | 325.00 | 65.00 |
| 06/30/21 | Ray Strong | Analyzed case documents in preparation for deposition in Howell matter. | 1.20 | 375.00 | 450.00 |
| | | **Total for Task Code 500** | **127.40** | | **43,795.50** |
| **Task Code: 600 - Tax Compliance & Analysis** | | | | | |
| 04/22/21 | Leif Larsen | Reviewed proposed amended Form 706 for completeness and accuracy. | 0.40 | 325.00 | 130.00 |
| 05/14/21 | Vernon Calder | Responded to inquiry from investor regarding treatment as Theft Loss. | 0.20 | 400.00 | 80.00 |
| 06/09/21 | Leif Larsen | Analyzed historical records in order to secure basis information related to certain assets to be sold in order to determine tax implications of sale. | 1.10 | 325.00 | 357.50 |
| | | **Total for Task Code 600** | **1.70** | | **567.50** |

BRG INVOICE

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


**Invoice #** 117983
**Client-Matter:** 16222-025457

| Date | Name | Description | Hours | Rate | Amount |
|---|---|---|---|---|---|
| **Task Code: 610 - Income Tax Preparation** | | | | | |
| 04/05/21 | Leif Larsen | Analyzed transactions for the period of October 1, 2020 through December 31, 2020 in order to identify taxable receipts, deductible expenditures and other reportable activity for the preparation of the 2020 income tax returns. | 2.90 | 325.00 | 942.50 |
| 04/05/21 | Leif Larsen | Analyzed numerous 2020 cash transactions and researched the proper reporting for the preparation of the 2020 income tax returns of the receivership. | 2.70 | 325.00 | 877.50 |
| 04/06/21 | Leif Larsen | Prepared additional supporting work papers to be used in the preparation of the 2020 income tax returns of the receivership. | 3.10 | 325.00 | 1,007.50 |
| 04/06/21 | Leif Larsen | Prepared the 2020 income tax returns of the receivership. | 2.80 | 325.00 | 910.00 |
| 04/09/21 | Vernon Calder | Reviewed 2020 income tax returns and related tax file. | 1.30 | 400.00 | 520.00 |
| 04/13/21 | Leif Larsen | Cleared review notes related to the 2020 receivership income tax returns and followed up on information needed in order to finalize the return. | 0.60 | 325.00 | 195.00 |
| 04/14/21 | Vernon Calder | Reviewed 2020 income tax return extensions. | 0.20 | 400.00 | 80.00 |
| 04/14/21 | Leif Larsen | Prepared and electronically filed federal and state extension Forms for 2020. | 0.50 | 325.00 | 162.50 |
| 04/14/21 | Jeffrey Shaw | Coordinated payment of amount due in connection with tax return. | 0.30 | 325.00 | 97.50 |
| 04/14/21 | Jeffrey Shaw | Correspondence regarding required tax payment. | 0.20 | 325.00 | 65.00 |
| 05/03/21 | Jeffrey Shaw | Reviewed and responded to emails regarding 2020 sales of assets for tax return preparation. | 0.60 | 325.00 | 195.00 |
| 05/06/21 | Jeffrey Shaw | Review and emails regarding closing docs for tax return. | 0.70 | 325.00 | 227.50 |
| | | **Total for Task Code 610** | **15.90** | | **5,280.00** |

BRG INVOICE

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


**Invoice #** 117983
**Client-Matter:** 16222-025457

| Date | Name | Description | Hours | Rate | Amount |
|---|---|---|---|---|---|
| **Task Code: 950 - Fee Application Preparation & Hearing** | | | | | |
| 04/28/21 | Jeffrey Shaw | Reviewed and revised time entries for Jan - Mar 2021. | 1.00 | 0.00 | N/C |
| 04/28/21 | Jeffrey Shaw | Correspondence regarding fee issues. | 0.20 | 0.00 | N/C |
| 05/03/21 | Jeffrey Shaw | Reviewed and prepared invoice for Jan-Mar 2021. | 0.80 | 0.00 | N/C |
| 05/24/21 | Jeffrey Shaw | Prepared narrative for fee application. | 0.60 | 0.00 | N/C |
| 05/25/21 | Leif Larsen | Reviewed time summaries for the period of January through March of 2021 and prepared narrative of tax related work performed for upcoming fee application. | 0.60 | 0.00 | N/C |
| 05/25/21 | Jeffrey Shaw | Reviewed and finalized narrative to be included in fee application. | 0.30 | 0.00 | N/C |
| 05/27/21 | Jeffrey Shaw | Followed-up regarding status of fee application. | 0.20 | 0.00 | N/C |
| 05/28/21 | Jeffrey Shaw | Correspondence regarding fee application status and issues. | 0.20 | 0.00 | N/C |
| | | **Total for Task Code 950** | **3.90** | | **0.00** |
| **Professional Services** | | | **218.90** | | **73,078.00** |

**DETAIL OF EXPENSES**

| Date | Description | Amount |
|---|---|---|
| **Data Retrieval** | | |
| 04/30/21 | CCH - CCH 4/23/21 - Data Retrieval Invoice #: 5411846240 Vchr Comment: Account #4001041067 Timekeeper : 09999 - Applicable, Not | 80.81 |
| 04/30/21 | CCH - CCH 4/23/21 - Data Retrieval Invoice #: 5411846241 Vchr Comment: Account #4001041067 Timekeeper : 09999 - Applicable, Not | 7.00 |
| | **Total For Data Retrieval** | **87.81** |
| **Expenses** | | **87.81** |

# Rust Coin Receivership
## Time Detail for Conflict Receiver and Klein & Associates
## April 1, 2021 to June 30, 2021

| Date | Worker | Hours | Rate | Amount | Description |
|---|---|---|---|---|---|
| 4/9/2021 | WK | 0.6 | 250.00 | 150.00 | Calls with D. Castleberry on strategy for oral argument on OSC motion against Zions Bank. |
| 4/12/2021 | WK | 1.1 | 250.00 | 275.00 | Particpate in Zoom court hearing on Receiver' OSC motion against Zions Bank; discussions with D. Castleberry on strategy, responses to possible questions by Court. |
| 4/13/2021 | WK | 0.9 | 250.00 | 225.00 | Read court opinion finding Zions Bank in contempt; call with D. Castleberry, emails with Parr Brown (.3); find time related to Zions Bank OSC, prepare invoice, send to Manning Curtis with comments (.6). |
| 4/15/2021 | WK | 0.3 | 250.00 | 75.00 | Call with D. Castleberry on fee application for Zions contempt order; revise fee application, send to D. Castleberry with comments. |
| 4/16/2021 | WK | 0.5 | 250.00 | 125.00 | Review fee application for Zions contempt order; create redline with comments; respond to D. Castleberry on time entries to omit (.3); read legal memo on government immunity claim for USU, read draft claim, respond to MC2B with approval to file. |
| 4/20/2021 | WK | 0.1 | 250.00 | 25.00 | Get filed notice of claim for Utah State University, send to USU counsel with comments. |
| 5/3/2021 | WK | 0.1 | 250.00 | 25.00 | Emails with Zions Bank attorney and Parr Brown on method for payment of $1.6 MM to Receiver; Zions' reaction to OSC order. |
| 5/18/2021 | WK | 0.1 | 250.00 | 25.00 | Call with D. Castleberry on tolling agreement with Zions Bank. |
| 5/26/2021 | WK | 0.3 | 250.00 | 75.00 | Discuss with D. Castleberry tolling of statutes of limitations for USU claim, when to file lawsuit. |
| 6/17/2021 | WK | 0.8 | 250.00 | 200.00 | Read memo from D. Castleberry on filings suit agaisnt USU; send directions (.4); gather and send documents to Manning Curtis for preparation of suit (.4). |
| 6/22/2021 | WK | 0.5 | 250.00 | 125.00 | Read draft complaint against USU, verify dates and amounts of contributions; create redline of complaint, send to D. Castleberry. |
| 6/28/2021 | WK | 0.5 | 250.00 | 125.00 | Call with M. McKinney, counsel for USU; notes of call; notify Manning Curtis of conversation; send copy of filed complaint to USU. |
| **Total** | | **5.8** | | **1,450.00** | |

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**www.mc2b.com**

Wayne Klein
Rust Coin Receivership
KLEIN & ASSOCIATES, PLLC
P.O. Box 1836
Salt Lake City, UT 84110

Statement Date: 04/30/2021

Account No: 21873

| Previous Balance | Fees | Expenses | Advances | Payments | Balance |
|---|---|---|---|---|---|
| 21873-00010 Edwards Jones | | | | | |
| 11,112.50 | 0.00 | 0.40 | 0.00 | 0.00 | $11,112.90 |

Taxpayer ID # 84-1395129

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P.O. Box 1836
Salt Lake City, UT 84110

| | |
|---|---|
| Page No: | 1 |
| Statement Date: | 04/30/2021 |
| Account No: | 21873-00010 |
| Statement No: | 62437 |

Edwards Jones

Expenses

| | |
|---|---|
| Photocopies | 0.40 |
| Total Expenses | 0.40 |
| Total Current Work | 0.40 |
| Previous Balance | $11,112.50 |
| Balance Due | $11,112.90 |

Taxpayer ID # 84-1395129

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KLEIN & ASSOCIATES, PLLC
P.O. Box 1836
Salt Lake City, UT 84110

Statement Date: 04/30/2021

Account No: 21873

| Previous Balance | Fees | Expenses | Advances | Payments | Balance |
|---|---|---|---|---|---|
| 21873-00020 Utah State | | | | | |
| 3,103.82 | 2,048.00 | 2.10 | 0.00 | 0.00 | $5,153.92 |

Taxpayer ID # 84-1395129

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Salt Lake City, UT 84110

| | |
|---|---|
| Page No: | 1 |
| Statement Date: | 04/30/2021 |
| Account No: | 21873-00020 |
| Statement No: | 62468 |

Utah State

Fees

| | | | Hours | |
|---|---|---|---|---|
| 04/02/2021 | | | | |
| | DCC | Draft e-mail to MMLongson re project in case and docket dates re same. | 0.20 | 80.00 |
| 04/09/2021 | | | | |
| | MML | Research re notice of claim procedures. | 0.40 | 92.00 |
| 04/13/2021 | | | | |
| | MML | Draft/revise Notice of Claim. | 0.40 | 92.00 |
| | DCC | Read e-mail from MMLongson re notice of claim. | 0.20 | 80.00 |
| 04/14/2021 | | | | |
| | MML | Draft/revise Notice of Claim; research re procedures for serving same and filing thereafter; draft memo to client summarizing Notice of Claim procedures. | 3.50 | 805.00 |
| | DCC | Read e-mail from MMLongson re drat notice of claim; read and analyze draft, etc.; conference with MMLongson re issues re GIA and review updated memo re same. | 0.60 | 240.00 |
| 04/16/2021 | | | | |
| | DCC | Update notice of claim and memo re same; draft e-mail to receiver re same; follow up e-mail exchanges with receiver re same. | 0.40 | 160.00 |

Rust Coin Receivership

Page No: 2
Statement Date: 04/30/2021
Account No: 21873-00020
Statement No: 62468

| | | Hours | |
|---|---|---|---|
| 04/17/2021 | | | |
| DCC | E-mail exchange with receiver re USU Notice of Claim. | 0.20 | 80.00 |
| 04/19/2021 | | | |
| MML | Proof and finalize Notice of Claim; direct LLAnderson re exhibit to same; research re procedures for service; direct LLAnderson re service of Notice. | 1.30 | 299.00 |
| DCC | Read e-mail from MMLongson re notice of claim in case. | 0.20 | 80.00 |
| 04/20/2021 | | | |
| DCC | Read e-mail from receiver re submittal of notice of claim. | 0.10 | 40.00 |
| | For Current Services Rendered | 7.50 | 2,048.00 |

Recapitulation

| Timekeeper | Hours | Rate | Total |
|---|---|---|---|
| David C. Castleberry | 1.90 | $400.00 | $760.00 |
| Mitch M. Longson | 5.60 | 230.00 | 1,288.00 |

Expenses

| | |
|---|---|
| Photocopies | 0.60 |
| Color Photocopies | 1.50 |
| Total Expenses | 2.10 |
| Total Current Work | 2,050.10 |
| Previous Balance | $3,103.82 |
| Balance Due | $5,153.92 |

Taxpayer ID # 84-1395129

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Wayne Klein
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KLEIN & ASSOCIATES, PLLC
P.O. Box 1836
Salt Lake City, UT 84110

Statement Date: 05/31/2021

Account No: 21873

| Previous Balance | Fees | Expenses | Advances | Payments | Balance |
|---|---|---|---|---|---|
| 21873-00020 Utah State | | | | | |
| 5,153.92 | 2,598.00 | 353.93 | 0.00 | 0.00 | $8,105.85 |

Taxpayer ID # 84-1395129

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| | |
|---|---|
| Page No: | 1 |
| Statement Date: | 05/31/2021 |
| Account No: | 21873-00020 |
| Statement No: | 62615 |

Utah State

Fees

| | | | Hours | |
|---|---|---|---|---|
| 05/04/2021 | | | | |
| | DCC | Read correspondence from state re notice of claim. | 0.20 | 80.00 |
| 05/05/2021 | | | | |
| | MML | Review correspondence received from State of Utah re Notice of Claim. | 0.10 | 23.00 |
| | DCC | Draft e-mail to receiver re notice from state re notice of claim. | 0.20 | 80.00 |
| 05/11/2021 | | | | |
| | DCC | Read e-mail from receiver and from counsel for USU re matter. | 0.20 | 80.00 |
| 05/18/2021 | | | | |
| | DCC | Review file; Draft e-mail to receiver re status of case; Read e-mail from receiver re issues in case. | 0.50 | 200.00 |
| 05/19/2021 | | | | |
| | MML | Analyze issues re possible defenses in case and research re same. | 0.50 | 115.00 |
| | DCC | Conference with MMLongson re analysis re defenses in case; read e-mail re dockets in case. | 0.40 | 160.00 |

Rust Coin Receivership

| | | Hours | |
|---|---|---|---|
| 05/20/2021 | | | |
| MML | Research re Governmental Immunity Act supplanting general statutes of limitation; research re date of "filing" of Notice of Claim; research re pleading around statute of limitations affirmative defense in federal court; draft memo summarizing same. | 3.10 | 713.00 |
| 05/21/2021 | | | |
| DCC | Legal research re issues re government immunity act and arguments re same; draft e-mail to MMLongson re research and background issues. | 1.50 | 600.00 |
| MML | Research re Governmental Immunity Act notice of claim requirements as jurisdictional and whether they may be tolled by express agreement; analyze issues re same with DCCastleberry; draft/revise memo re same. | 2.90 | 667.00 |
| 05/24/2021 | | | |
| MML | Continue research re nonclaim statutes and statutes of limitation; draft/revise Memo re same for DCCastleberry review. | 3.50 | 805.00 |
| DCC | Read e-mail from MMLongson re memo re possible defenses in case. | 0.20 | 80.00 |
| 05/25/2021 | | | |
| MML | Draft/revise memo re Utah State timeliness issues based on DCCastleberry comments. | 0.80 | 184.00 |
| DCC | Edit and revise memo and note follow up re same; draft e-mail to MMLongson re same. | 1.00 | 400.00 |
| 05/26/2021 | | | |
| MML | Further research re US Supreme Court law on jurisdictional limitations periods; add same to memo and address other comments from DCCastleberry in memo. | 1.70 | 391.00 |
| DCC | Conference with receiver re issues in case; read e-mail and udpated memo from MMLongson re procedural issues; analyze issues in matter. | 0.80 | 320.00 |
| DCC | Conference with receiver re issues in case; review e-mail and | | |

Rust Coin Receivership

| | Hours | |
|---|---|---|
| updated memo from MMLongson re issues in case. | 0.50 | 200.00 |
| For Current Services Rendered | 18.10 | 5,098.00 |
| **Courtesy Discount** | | -2,500.00 |
| Net Fees after Courtesy Discount | | 2,598.00 |

Recapitulation

| Timekeeper | Hours | Rate | Total |
|---|---|---|---|
| David C. Castleberry | 5.50 | $400.00 | $2,200.00 |
| Mitch M. Longson | 12.60 | 230.00 | 2,898.00 |

Expenses

| | |
|---|---|
| Computer Research Westlaw | 353.93 |
| Total Expenses | 353.93 |
| Total Current Work | 2,951.93 |
| Previous Balance | $5,153.92 |
| Balance Due | $8,105.85 |

Taxpayer ID # 84-1395129

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P.O. Box 1836
Salt Lake City, UT 84110

Statement Date: 06/30/2021

Account No: 21873

| Previous Balance | Fees | Expenses | Advances | Payments | Balance |
|---|---|---|---|---|---|
| 21873-00020 Utah State | | | | | |
| 8,105.85 | 3,718.00 | 0.00 | 402.00 | 0.00 | $12,225.85 |

Taxpayer ID # 84-1395129

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Salt Lake City, UT 84110

| | |
|---|---|
| Page No: | 1 |
| Statement Date: | 06/30/2021 |
| Account No: | 21873-00020 |
| Statement No: | 62957 |

Utah State

Fees

| | | | Hours | |
|---|---|---|---|---|
| 06/15/2021 | | | | |
| | DCC | Edit memo re possible defenses and issues in case. | 0.50 | 200.00 |
| 06/17/2021 | | | | |
| | MML | Review direction from client and materials received from client re filing of complaint. | 0.20 | 46.00 |
| | DCC | Edit and revise memo re defenses in case; review case law and arguments re same and legal research re same; draft e-mail to receiver re same; review e-mail from receiver re same; draft e-mail to receiver re information and documents needed for complaint; review e-mail and documents from receiver re information for complaint. | 1.60 | 640.00 |
| 06/18/2021 | | | | |
| | MML | Review materials received from client; draft/revise Complaint. | 3.30 | 759.00 |
| 06/21/2021 | | | | |
| | MML | Draft/revise Complaint for review by DCCastleberry. | 0.70 | 161.00 |
| | DCC | Review e-mail from MMLongson re draft complaint; review complaint; edit complaint; draft e-mail to receiver re same. | 0.70 | 280.00 |

Rust Coin Receivership

| | | | Hours | |
|---|---|---|---|---|
| 06/22/2021 | | | | |
| | DCC | Read e-mail from receiver re complaint; review redline of complaint; follow up re same. | 0.30 | 120.00 |
| 06/23/2021 | | | | |
| | MML | Incorporate client edits into Complaint and proof same; direct LLAnderson re Complaint exhibits and review same for filing. | 1.00 | 230.00 |
| | DCC | Read e-mail from MMLongson re complaint and re exhibits to same; analyze legal issues and follow up re same. | 0.50 | 200.00 |
| 06/24/2021 | | | | |
| | MML | Draft/revise Civil Cover Sheet and Summons; direct LLAnderson re same and filing of Complaint. | 1.00 | 230.00 |
| | DCC | Review draft of Complaint; email exchanges with MMLongson re same; provide instruction to MMLongson re filing re same. | 0.50 | 200.00 |
| 06/25/2021 | | | | |
| | DCC | Review filed complaint and identify dockets for follow up in case. | 0.50 | 200.00 |
| 06/28/2021 | | | | |
| | DCC | Email exchanges with receiver re filed complaint and communications with USU; review emails from counsel for USU and receiver; e-mail exchanges with receiver re press inquiry. | 0.70 | 280.00 |
| | MML | Review e-mail from Wayne Klein re discussion with Mica McKinney. | 0.20 | 46.00 |
| 06/30/2021 | | | | |
| | DCC | Read e-mail from MMLongson re deadlines in case; draft e-mail to MMLongson re same. | 0.20 | 80.00 |
| | MML | Research re statutory undertaking requirement. | 0.20 | 46.00 |
| | | For Current Services Rendered | 12.10 | 3,718.00 |

Rust Coin Receivership

Recapitulation

| Timekeeper | Hours | Rate | Total |
|---|---|---|---|
| David C. Castleberry | 5.50 | $400.00 | $2,200.00 |
| Mitch M. Longson | 6.60 | 230.00 | 1,518.00 |

Advances

| | | |
|---|---|---|
| 06/24/2021 | Filing Fees US District Court | 402.00 |
| | Total Advances | 402.00 |
| | Total Current Work | 4,120.00 |
| | Previous Balance | $8,105.85 |
| | Balance Due | $12,225.85 |

Taxpayer ID # 84-1395129

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Wayne Klein
Rust Coin Receivership
KLEIN & ASSOCIATES, PLLC
P.O. Box 1836
Salt Lake City, UT 84110

Statement Date: 04/30/2021

Account No: 21873

| Previous Balance | Fees | Expenses | Advances | Payments | Balance |
|---|---|---|---|---|---|
| 21873-00030 Zions Bank | | | | | |
| 6,852.85 | 5,281.00 | 120.55 | 11.00 | 0.00 | $12,265.40 |

Taxpayer ID # 84-1395129

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P.O. Box 1836
Salt Lake City, UT 84110

| | |
|---|---|
| Page No: | 1 |
| Statement Date: | 04/30/2021 |
| Account No: | 21873-00030 |
| Statement No: | 62439 |

Zions Bank

Fees

| | | | Hours | |
|---|---|---|---|---|
| 04/01/2021 | | | | |
| | DCC | E-mail exchanges re upcoming hearing; review follow up emails re same; review court notice re same. | 0.40 | 160.00 |
| 04/08/2021 | | | | |
| | DCC | Read briefing on motion for order to show cause in preparation for hearing in matter; analyze issues and develop strategy for oral argument. | 1.10 | 440.00 |
| 04/09/2021 | | | | |
| | MML | Direct LLAnderson re legal research file preparation for oral argument. | 0.30 | 69.00 |
| | DCC | Read briefing in case related to Motion for OSC; read procedural history of case and related filings and study filings cited by parties in briefing and outline issues and facts re same; read emails from receiver re hearing; telephone conference with Receiver re hearing. | 3.30 | 1,320.00 |
| 04/10/2021 | | | | |
| | DCC | Read cases cited in briefing related to Motion for OSC; analyze issues in matter and organize argument. | 2.20 | 880.00 |
| 04/12/2021 | | | | |
| | DCC | Prepare for hearing on motion for order to show cause; | | |

Rust Coin Receivership

| | | Hours | |
|---|---|---|---|
| | rework outline outline re argument and read cases cited; argue motion. | 3.50 | 1,400.00 |
| 04/13/2021 | | | |
| DCC | Read decision on motion for order to show cause; conference with counsel for Zions Bank re ruling; conference with receiver re ruling. | 0.40 | 160.00 |
| 04/14/2021 | | | |
| DCC | Read e-mail and attachment from receiver re fees in case; follow up re same with MMLongson and receiver. | 0.30 | 120.00 |
| 04/15/2021 | | | |
| DCC | Follow up re issues re fees in case; read emails re same. | 0.20 | 80.00 |
| 04/16/2021 | | | |
| DCC | Draft fee affidavit; revise fee affidavit; review billings re same; e-mail exchanges with receiver re same. | 1.00 | 400.00 |
| 04/19/2021 | | | |
| MML | Proof and finalize Fee Declaration and direct LLAnderson re creation of exhibits for and filing same. | 0.40 | 92.00 |
| DCC | Finalize and file declaration re fees; e-mail exchanges with MMLongson re same. | 0.40 | 160.00 |
| | For Current Services Rendered | 13.50 | 5,281.00 |

Recapitulation

| Timekeeper | Hours | Rate | Total |
|---|---|---|---|
| David C. Castleberry | 12.80 | $400.00 | $5,120.00 |
| Mitch M. Longson | 0.70 | 230.00 | 161.00 |

Expenses

| | |
|---|---|
| Photocopies | 21.00 |
| Computer Research Westlaw | 99.55 |
| Total Expenses | 120.55 |

Rust Coin Receivership

## Advances

| | | |
|---|---|---|
| 04/15/2021 | Electronic Document Processing - PACER [Billed Quarterly] - Electronic Court Records | 11.00 |
| | Total Advances | 11.00 |
| | Total Current Work | 5,412.55 |
| | Previous Balance | $6,852.85 |
| | Balance Due | $12,265.40 |

Taxpayer ID # 84-1395129

MANNING CURTIS BRADSHAW & BEDNAR PLLC
ATTORNEYS

136 East South Temple, Suite 1300
Salt Lake City, Utah 84111
(801) 363-5678
Facsimile (801) 364-5678
**www.mc2b.com**

Wayne Klein
Rust Coin Receivership
KLEIN & ASSOCIATES, PLLC
P.O. Box 1836
Salt Lake City, UT 84110

Statement Date: 05/31/2021

Account No: 21873

| Previous Balance | Fees | Expenses | Advances | Payments | Balance |
|---|---|---|---|---|---|
| 21873-00030 Zions Bank | | | | | |
| 12,265.40 | 600.00 | 0.00 | 0.00 | 0.00 | $12,865.40 |

Taxpayer ID # 84-1395129

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Salt Lake City, UT 84110

| | |
|---|---|
| Page No: | 1 |
| Statement Date: | 05/31/2021 |
| Account No: | 21873-00030 |
| Statement No: | 62616 |

Zions Bank

Fees

| | | | Hours | |
|---|---|---|---|---|
| 05/03/2021 | | | | |
| | DCC | E-mail exchanges re payment of judgment amount; note follow up re same. | 0.20 | 80.00 |
| | DCC | Telephone conference with opposing counsel; e-mail exchanges with receiver re same. | 0.40 | 160.00 |
| 05/05/2021 | | | | |
| | DCC | Read e-mail from Steve Waterman and draft e-mail to receiver re same. | 0.20 | 80.00 |
| | DCC | Read e-mail from opposing counsel re transfer; draft email to receiver re same. | 0.20 | 80.00 |
| 05/18/2021 | | | | |
| | DCC | Review file; Draft e-mail to receiver re status of case; Read e-mail from receiver re issues in case. | 0.50 | 200.00 |
| | | For Current Services Rendered | 1.50 | 600.00 |

Recapitulation

| Timekeeper | Hours | Rate | Total |
|---|---|---|---|
| David C. Castleberry | 1.50 | $400.00 | $600.00 |

Rust Coin Receivership

Page No: 2
Statement Date: 05/31/2021
Account No: 21873-00030
Statement No: 62616

| | |
|---|---|
| Total Current Work | 600.00 |
| Previous Balance | $12,265.40 |
| Balance Due | $12,865.40 |

Taxpayer ID # 84-1395129

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Wayne Klein
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KLEIN & ASSOCIATES, PLLC
P.O. Box 1836
Salt Lake City, UT 84110

Statement Date: 06/30/2021

Account No: 21873

| Previous Balance | Fees | Expenses | Advances | Payments | Balance |
|---|---|---|---|---|---|
| 21873-00030 Zions Bank | | | | | |
| 12,865.40 | 0.00 | 0.00 | 0.00 | 0.00 | $12,865.40 |

Taxpayer ID # 84-1395129

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Salt Lake City, UT 84110

| | |
|---|---|
| Page No: | 1 |
| Statement Date: | 06/30/2021 |
| Account No: | 21873-00030 |
| Statement No: | 62958 |

Zions Bank

| | |
|---|---|
| Previous Balance | $12,865.40 |
| Balance Due | $12,865.40 |

Taxpayer ID # 84-1395129

Joseph M.R. Covey (7492) (jcovey@parrbrown.com)
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*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<br><br>STATE OF UTAH DIVISION OF SECURITIES, through Attorney General Sean D. Reyes<br><br>Plaintiffs,<br><br>vs.<br><br>RUST RARE COIN INC., a Utah corporation, GAYLEN DEAN RUST, an individual, DENISE GUNDERSON RUST, an individual, JOSHUA DANIEL RUST, an individual,<br><br>Defendants;<br><br>and<br><br>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.<br><br>Relief Defendants. | **ORDER GRANTING ELEVENTH INTERIM FEE APPLICATION**<br><br>Civil No. 2:18-cv-00892-TC<br><br>Judge Tena Campbell<br><br>Magistrate Judge Dustin Pead |

Before the Court is the eleventh 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 expenses incurred by the Receiver; the Receiver's counsel, Parr Brown Gee & Loveless ("Parr Brown"); the Receiver's accountants, Berkeley Research Group ("BRG"), the Conflict Receiver, Wayne Klein, and his legal counsel, Manning Curtis Bradshaw & Bednar, for the period of April 1, 2021 through June 30, 2021 (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, the Conflict Receiver and his counsel as follows:

| | | |
|---|---|---|
| a. | Receiver: | $22,248.00 for fees. |
| b. | Parr Brown: | $348,887.00 for fees and<br>$2,879.51 for out-of-pocket expenses. |
| c. | BRG: | $73,078.00 for fees and<br>$87.81for out-of-pocket expenses. |
| d. | Conflict Receiver: | $14,795 for fees and<br>$889.98 for out of pocket 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 _____, 2021.

_____
Honorable Dustin B. Pead
United States Magistrate Judge