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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.	**SEVENTEENTH 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 seventeenth interim fee application (this "Fee Application"), seeking approval by the Court for the fees and expenses incurred by the Receiver; the Receiver's counsel, Parr Brown Gee & Loveless ("Parr Brown"); and the Receiver's accountants, Berkeley Research Group ("BRG"), for the period of October 1, 2022, through December 31, 2022 (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 *Seventeenth Quarterly Status Report*, which includes a status report for the period of October 1, 2022, through December 31, 2022 (the "Seventeenth

Status Report").[1] The Seventeenth Status Report provides a comprehensive description of the services performed by the Receiver and his professionals during the Application Period and is incorporated herein by reference.

II. REQUEST FOR COURT APPROVAL OF FEES AND EXPENSES

3. The Appointment Order provides, in the relevant part:

> 57. Subject to Paragraph 59 immediately below, the Receiver is authorized to solicit persons and entities ("Retained Personnel") to assist him in carrying out the duties and responsibilities described in this Order. The Receiver shall not engage any Retained Personnel without first obtaining an Order of the Court authorizing such engagement.
>
> 58. The Receiver and Retained Personnel are entitled to reasonable compensation and expense reimbursement from the Receivership Estates. The Receiver and Retained Personnel shall not be compensated or reimbursed by, or otherwise entitled to, any funds from the Court, the CFTC, or the State of Utah. Such compensation shall require the prior review by Plaintiffs and approval of the Court.

4. Accordingly, the Receiver respectfully requests that the Court approve the fees and expenses incurred by the Receiver and his team, and BRG, as set forth below and in the attached Exhibits.

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

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

[1] Docket No. 484 filed October 31, 2022.

6. Parr Brown and BRG have submitted their invoices to the Receiver, and the Receiver has reviewed and approved the invoices.

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

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

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

IV. SUMMARY OF AMOUNTS REQUESTED

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

a. Receiver: From October 1, 2022, through December 31, 2022, the Receiver billed a total of 43 hours for services to the Receivership Estate. The Receiver is seeking

approval for the payment of fees totaling $17,630.00. *See* Exhibit A.

b. Parr Brown: From October 1, 2022, through December 31, 2022, Parr Brown billed a total of 1,236.8 hours for legal services to the Receivership Estate. Parr Brown is seeking approval for the payment of fees and expenses totaling $342,334.58 of which $341,729.26 is for fees and $605.32 is for out-of-pocket expenses. *See* Exhibit B. These amounts include a voluntary write down of $9,979.

c. BRG: From October 1, 2022, through December 31, 2022, BRG billed a total of 296.5 hours providing forensic, tax, and general accounting services to the Receivership Estate. BRG is seeking approval for the payment of fees and expenses totaling $100,339.09 of which $100,279.50 is for fees and $59.59 for out-of-pocket expenses. *See* Exhibit C. These amounts include a voluntary write down of $1,292.00.

11. The amounts requested reflect a total of $11,271.00 in voluntary reductions by the respective professionals in an exercise of their billing judgment.

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

V. SUMMARY OF EXHIBITS

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

14. The Receiver, Parr Brown and BRG have maintained their time in records

organized according to tasks, with each task record being maintained in chronological order.

15. The following Exhibits are attached hereto in support of this Fee Application:

Exhibit A—Time Records of Receiver

Exhibit A Summary by Task

16. This section of Exhibit A breaks down the total fees assessed for each of the Receiver's tasks, which are discussed in more detail below.

Exhibit A-1 Administration of Receivership Estate

17. The Receiver continued to communicate with the Utah Attorney General's Office to ensure they remain updated about the status of the Receivership Estate and the ongoing claims analysis process and recovery efforts. In addition, the Receiver reviewed certain tax and financial documents related to the administration of the Receivership Estate and assisted in the preparation and filing of the Estate's tax returns.

Exhibit A-2 Asset Analysis and Recovery

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

Exhibit A-5 Claims Administration

19. The Receiver worked in tandem with his legal counsel to create a Claims Registry which identifies all 627 claims submitted to date and sets forth the Receiver's proposed treatment

of each claim.

Exhibit B-Time Records of Parr Brown

Exhibit B Summary by Task

20. This section of Exhibit B breaks down the total fees assessed for each of Parr Brown's tasks, which are discussed in more detail below.

Exhibit B-1 Administration of Receivership Estate

21. During this Application Period, Parr Brown continued to manage and keep secure the property within the Receivership Estate. Parr Brown continued posting motions and Court orders on the Receiver's website and also providing updates to the Receiver's mailing matrix to ensure all interested parties received information about the Receivership's progress.

Exhibit B-2 Asset Analysis & Recovery

22. During the Application Period, Parr Brown continued to work the numerous claw back actions filed against 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 discussions and negotiations regarding their transactions with the Receivership Defendants. As a result of the Court granting the Receiver's Motion for Settlement Authority (*See* Dkt. No. 271), Parr Brown has worked closely with the Receiver to finalize agreements and negotiate with investors and creditors to increase the number of settlement agreements.

Exhibit B-3 Disposition of Assets

23. During the Application Period, Parr Brown worked on the sale of certain intellectual property assets.

Exhibit B-5 Claims Administration

24. During this Application Period, Parr Brown continued to review and analyze the 627 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.

25. During the Application Period, Parr Brown worked closely with the Receiver to refine a Claims Registry distilling the analysis done by the Receiver, his attorneys and his forensic accounting team. This Registry identifies all 627 claims by number and name and sets forth the Receiver's proposed treatment of each claim.

Exhibit C-Time Records of BRG

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

Claims Process/Distribution

27. BRG worked extensively with the Receiver's team to review the investor claims filed and recorded in this matter. BRG assisted the Receiver's team to review, analyze and reconcile over 500 investor claims that were included in the claims register prepared by the Receiver. BRG also provided assistance in the determination and calculation of the percent recovery for investor claims, as well as the allowed amount of investor claims.

Net Winner/Claims Analysis

28. BRG continued to analyze and review information, support, and transaction data contained in RRC's records, as well as investor claims for various investors in connection with the Receiver's claims review process. BRG has assisted the Receiver and his team to verify the accuracy of claims, identify any issues with claims, and reconcile the amount being claimed by the investor with the books and records of RRC.

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

30. BRG also continues to perform analysis of cash receipt and disbursement activity, transaction support, investor files, email communications, as well as information received from individual investors through questionnaire responses, claim filings, and document requests for various investors and investor groups in order to identify and determine the amount of funds invested and draws taken by each individual / group. BRG's analysis has been critical in assisting the Receiver to identify and verify potential claw backs to pursue, as well as potential claims by investors. BRG has also developed and provided additional analyses to the Receiver for investors to be used in discussions, negotiations, and potential recoveries.

31. Additionally, BRG continues to assist the Receiver in communications with investors and their counsel, including participating in mediations, meetings, and calls, to obtain additional information and support regarding investment activity and to reach settlement agreements. BRG has worked with the Receiver and his counsel to analyze and review proposed settlement offers and financial information from investors to determine the appropriateness and

accuracy of such offers.

Document Subpoena Requests

32. BRG reviewed, prepared, and submitted requested case files, documents, and support in response to a subpoena it received in a separate litigation. BRG coordinated its efforts with the Receiver's counsel and the Utah Attorney General's office.

VI. PRIOR REQUESTS AND INTERIM NATURE OF REQUEST

33. The Receiver has previously filed sixteen interim fee applications,[2] all of which were approved by the Court. *See* Dkt. Nos. 153, 203, 247, 275, 293, 339, 367, 382, 413, 416, 428, 434, 442, 461, 481 and 488. This is the Seventeenth Interim Fee Application of the Receiver and his professionals. The Receiver and his professionals understand that the authorization and payment of fees and expenses is interim in nature. All fees and expenses allowed on an interim basis will be subject to final review at the close of the case and the discharge of the Receiver when the Receiver files a final accounting and the Receiver and his professional's file final fee applications.

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

34. 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 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.

35. 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.

36. The Receiver respectfully requests that the Court enter an Order (i) approving, on an interim basis, the Receiver's fees in the amount of $17,630.00; Parr Brown's fees in the amount of $341,729.26 and out-of-pocket expenses of $605.32; BRG's fees in the amount of $100,279.50 and out-of-pocket expenses of $59.59; 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.

37. A proposed Order is attached hereto as **Exhibit D**.

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

DATED this 14th day of March 2023.

RECEIVER

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

PARR BROWN GEE & LOVELESS, P.C.

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

BERKELEY RESEARCH GROUP

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

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the above **SEVENTEENTH INTERIM FEE APPLICATION** was (1) electronically filed with the Clerk of the Court through the CM/ECF system on March 14, 2023, which sent notice of the electronic filing to all counsel of record, (2) posted on the Receiver's website (rustrarecoinreceiver.com), and (3) emailed to all those on the Receiver's master mailing matrix.

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Wayne Klein KLEIN & ASSOCIATES PO BOX 1836 SALT LAKE CITY, UT 84110 801-824-9616 wklein@kleinutah.com	

____/s/ Lori Stumpf_____

EXHIBIT A

EXHIBIT A

SEVENTEENTH FEE APPLICATION

Receiver's Fees

EXHIBIT A

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

January 15, 2023

Invoice: 921735
Client: 177110
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration

Professional Services	$ 984.00
Total Costs Advanced	$ .00
TOTAL THIS INVOICE	**$ 984.00**

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: 921735
Rust Rare Coin Receiver
Administration

January 15, 2023
Client: 177110
Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/19/22	JOH	Attend to banking matter	.20	82.00
10/31/22	JOH	Review and revise Receiver's Report; Correspond by email with legal counsel re same; Review related documents; attention to potential settlement; Correspond by email with legal counsel re claims review matter; Attend to potential sale of Josh Rust home; Correspond by email with legal counsel re same; Attend to clawback action	1.80	738.00
12/13/22	JOH	Review incoming payments; Attend to clawback action	.40	164.00

TOTAL PROFESSIONAL SERVICES **$ 984.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	410.00	2.40	984.00
TOTALS		**2.40**	**$ 984.00**

TOTAL THIS INVOICE **$ 984.00**

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

January 15, 2023

Invoice: 921735
Client: 177110
Matter: 1

REMITTANCE ADVICE

RE: Administration

BALANCE DUE THIS INVOICE **$ 984.00**

Please return this advice with payment to:

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

Wire Transfer Instructions

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

E-Check

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

EFT/ACH Pay Instructions
Routing #: 124001545
Account #: 912454114

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

Please reference your invoice # 921735

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

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

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

January 15, 2023

Invoice: 921736
Client: 177110
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Assett Analysis & Recovery

Professional Services	$ 11,152.00
Total Costs Advanced	$ .00
TOTAL THIS INVOICE	**$ 11,152.00**

Invoice: 921736
Rust Rare Coin Receiver
Asset Analysis & Recovery

January 15, 2023
Client: 177110
Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/03/22	JOH	Review documents; Attend to two clawback actions; Correspond by email with legal counsel re same; Follow up re completion of clawback settlement; Research re additional clawback action	1.40	574.00
10/04/22	JOH	Research re history of clawback settlement negotiations; Analyze claim	1.10	451.00
10/11/22	JOH	Attend to clawback action; Correspond by email with legal counsel re potential settlement of additional clawback action	.80	328.00
10/13/22	JOH	Review documents relating to various claims; Attend to clawback action; Correspond by email with legal counsel re scheduling matters	1.30	533.00
10/17/22	JOH	Attend to two clawback actions; Review proposed settlement agreement in clawback action and related email correspondence; Attend to claims analysis	1.50	615.00
10/20/22	JOH	Attend to clawback action	.80	328.00
10/21/22	JOH	Attend to clawback litigation issues; Review documents; Correspond by email with legal counsel re potential settlement	.60	246.00
10/24/22	JOH	Attend to clawback action; Analyze settlement terms of proposed agreement in clawback action and related email correspondence; Attend to claims matters	1.10	451.00
10/28/22	JOH	Analyze potential settlement offer; Correspond by email with legal counsel re same; Review documents relating to claims process; Communicate with legal counsel re Receiver's Report	1.40	574.00
11/01/22	JOH	Attend to various discovery-related matters; Review documents relating to clawback	1.30	533.00
11/07/22	JOH	Review email correspondence re Zions subpoena	.10	41.00
11/08/22	JOH	Attend to clawback action; Review related documents; Review multiple emails re discovery issue	.90	369.00
11/09/22	JOH	Attend to various clawback actions; Review documents related to same; Review email correspondence re potential settlements; Follow up re same	1.00	410.00
11/11/22	JOH	Attend to two clawback actions; Review bank statements	1.30	533.00
11/15/22	JOH	Attend to responsive actions to scam calls to victims; Follow up with legal counsel re same; Correspond by email with legal counsel re clawback actions; Review documents relating to discovery matters	1.10	451.00
11/16/22	JOH	Prepare for and participate in meeting with counsel re clawback actions, work allocation and related matters; Correspond by email with counsel re same; Review documents; Review legal authority re ponzi schemes	3.40	1,394.00
11/18/22	JOH	Attend to discovery matter	.20	82.00
11/29/22	JOH	Follow up with legal counsel re status of clawback actions and claims registry; Attend to clawback action	.20	82.00
12/01/22	JOH	Attend to clawback action; Review email correspondence from legal counsel	.40	164.00
12/02/22	JOH	Attend to clawback action	.30	123.00

PARR BROWN GEE & LOVELESS

Invoice: 921736
Rust Rare Coin Receiver
Asset Analysis & Recovery

January 15, 2023
Client: 177110
Matter: 2

Date	Tkpr	Description	Hours	Amount
12/05/22	JOH	Attend to clawback action; Correspond by email with legal counsel re various matters	.50	205.00
12/06/22	JOH	Attend to two clawback actions; Correspond by email with legal counsel re various matters; Attend to claims transfer notice	1.40	574.00
12/07/22	JOH	Attend to two clawback matters; Correspond by email with legal counsel re various matters	.80	328.00
12/08/22	JOH	Attend to clawback action; Review email correspondence re service issue	.40	164.00
12/09/22	JOH	Attend to clawback action	.30	123.00
12/12/22	JOH	Attend to discovery issue in clawback action; Review draft settlement agreement	.60	246.00
12/14/22	JOH	Attend to discovery matter in clawback action	.30	123.00
12/15/22	JOH	Attend to clawback action	.30	123.00
12/20/22	JOH	Attend to clawback action; Follow up with legal counsel re same; Review email correspondence from claimant	.40	164.00
12/22/22	JOH	Attend to incoming settlement payment	.10	41.00
12/28/22	JOH	Correspond by email with legal counsel re clawback action; Review documents re claims; Review email correspondence re forum issue	1.30	533.00
12/29/22	JOH	Correspond by email with legal counsel re settlement; Attend to two clawback actions	.60	246.00

TOTAL PROFESSIONAL SERVICES **$ 11,152.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	410.00	27.20	11,152.00
TOTALS		**27.20**	**$ 11,152.00**

TOTAL THIS INVOICE **$ 11,152.00**

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

January 15, 2023

Invoice: 921736
Client: 177110
Matter: 2

REMITTANCE ADVICE

RE: Assett Analysis & Recovery

BALANCE DUE THIS INVOICE **$ 11,152.00**

Please return this advice with payment to:

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

Wire Transfer Instructions

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

E-Check

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

EFT/ACH Pay Instructions
Routing #: 124001545
Account #: 912454114

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

Please reference your invoice # 921736

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

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

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

January 15, 2023

Invoice: 921737
Client: 177110
Matter: 5

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Claims Administration

Professional Services	$ 5,494.00
Total Costs Advanced	$ .00
TOTAL THIS INVOICE	**$ 5,494.00**

PARR BROWN GEE & LOVELESS

Invoice: 921737
Rust Rare Coin Receiver
Claims Administration

January 15, 2023
Client: 177110
Matter: 5

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/25/22	JOH	Prepare for and participate in meetings with legal counsel analyzing various claims; Attend to three clawback actions; Call with bank re various matters; Review email correspondence re same	3.90	1,599.00
10/26/22	JOH	Further attention to claims analysis; Meet with legal counsel re various matters; Attend to multiple clawback actions	5.80	2,378.00
10/27/22	JOH	Further attention to claims analysis; Follow up re banking issue; Meet with legal counsel re potential settlement; Review documents re same	3.50	1,435.00
12/16/22	JOH	Review communications from victim; Follow up re same	.20	82.00

TOTAL PROFESSIONAL SERVICES **$ 5,494.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	410.00	13.40	5,494.00
TOTALS		**13.40**	**$ 5,494.00**

TOTAL THIS INVOICE **$ 5,494.00**

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

January 15, 2023

Invoice: 921737
Client: 177110
Matter: 5

REMITTANCE ADVICE

RE: Claims Administration

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EXHIBIT B

EXHIBIT B
SEVENTEENTH FEE APPLICATION
Parr Brown's Fees & Expenses

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

January 15, 2023

Invoice: 921730
Client: 176430
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration of Receivership Estate

Professional Services	$ 8,448.70
Total Costs Advanced	$ 59.40
TOTAL THIS INVOICE	**$ 8,508.10**
Credit Balance Applied (overpay 12/30/22)	$ -74.84
BALANCE DUE THIS INVOICE	**$ 8,433.26**

Invoice: 921730
Rust Rare Coin Receivership
Administration of Receivership Estate

January 15, 2023
Client: 176430
Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/10/22	WOP	Review docket history; Correspond with multiple attorneys re current status; Review attorney time sheets for quarterly report	2.70	648.00
10/12/22	JMC	Correspond with Lori Stumpf and others re Payoneer and Tunecore payments	.20	78.00
10/12/22	WOP	Review attorney time sheets; Correspond with Kathy and Susie re updates for quarterly report; Review quarterly ledger; Draft quarterly report	4.40	1,056.00
10/12/22	SB	Email from Walter Peterson re quarterly report update; Email exchanges with Kathy Bates re same; Email to the team re same; Review and comment on the undated RRC initial Disclosures; Review email from Josh Lee re response labeling; Email exchange with MIchael Hoppe re same	1.00	200.00
10/12/22	SB	Review document collections and update folder structures; Remove duplicates and prepare an index of same	2.40	480.00
10/13/22	WOP	Continue draft of quarterly report	1.40	336.00
10/14/22	JMC	Correspond with Lori Stumpf re Denise Rust time entries; Correspond with Jeff Balls re impact on Rust case of new lawyers	1.00	390.00
10/17/22	JMC	Correspond with Lori Stumpf re TuneCore issues	.30	117.00
10/18/22	JMC	No Charge - Correspond with Walter Peterson re fee application	.20	N/C
10/18/22	WOP	Draft quarterly status report and related tasks	2.10	504.00
10/20/22	JMC	Correspond with Jessie Houf and others re CC Soundhouse payment and related issues	.30	117.00
10/20/22	WOP	Revise quarterly report per feedback; Create exhibits; Correspond with Kathy re same; Correspond with Susie re same	3.30	792.00
10/20/22	SB	Research and send the Gaylen Rust guilty plea to Claire McGuire per her request	.20	40.00
10/21/22	JH	Correspond with Claire McGuire and Susie Bailey re Zions subpoena; Organize information responsive to request	1.90	290.70
10/24/22	JMC	Correspond with Walter Peterson re quarterly status report; Review and revise reports	1.20	468.00
10/24/22	JMC	No Charge - Correspond with Wayne Klein re fee application	.10	N/C
10/24/22	WOP	No Charge - Correspond with conflict receiver re time for fee application; Redact time sheets; Correspond with various attorneys re same; Correspond with Caralee re same	2.90	N/C
10/25/22	JMC	Correspond with Lori Stumpf re payment from Payoneer	.10	39.00
10/25/22	JMC	Correspond with Michael Hoppe and Jeff Balls re various clawback matters and settlement	.90	351.00
10/26/22	JMC	Review and revise quarterly report	.20	78.00
10/27/22	WOP	No Charge - Review and redact attorney time sheets; Correspond with BRG re same; Correspond with Caralee; Review revised time sheets	3.30	N/C
10/27/22	WOP	No Charge - Draft fee application	2.10	N/C

Invoice: 921730
Rust Rare Coin Receivership
Administration of Receivership Estate

January 15, 2023
Client: 176430
Matter: 1

Date	Tkpr	Description	Hours	Amount
10/28/22	JMC	Review and finalize sixteenth quarterly report; Correspond with Jon Hafen re the same	1.00	390.00
10/31/22	JMC	Review and revise sixteenth quarterly status report; Correspond with Jon Hafen re the same	.50	195.00
10/31/22	WOP	Review comments to quarterly report; Revise the same	.80	192.00
10/31/22	WOP	No Charge - Correspond with Arizona counsel; Correspond with Joe Covey re fee application; Continue review of time sheets; Continue draft of application	4.30	N/C
11/03/22	SB	Email exchange with Claire McGuire; Review the collections prepared for any actions related to Zions Bank; Summarize file size and property information; Summarize the history of productions to Zions; Email results to Claire McGuire; Communications with Jessica Houf re OneDrive share file and access for new attorneys	2.00	400.00
11/07/22	JMC	No Charge - Correspond with Jeff Shaw re fee application	.10	N/C
11/10/22	WOP	No Charge - Review and redact BRG invoices; Create exhibits for fee application; Revise draft of fee application; Correspond with Joe re same	5.80	N/C
11/11/22	JMC	Correspond with Jacob Strain with the government and Robert Wing and others re civil actions against Denise and Josh Rust, restitution orders and related issues; Review restitution orders; Review and analyze Rust bank account balances	1.80	702.00
11/11/22	WOP	No Charge - Revise and finish draft of fee application	2.80	N/C
11/14/22	JMC	Correspond with Jeff Balls re Zions documents and plan of distribution	.30	117.00
11/18/22	JMC	Review and analyze court order re substitution of counsel; Correspond with Jeff Balls and Claire McGuire re the same; Review and analyze several court approvals of settlements and other motions; Correspond with Ray Strong re turnover of documents	.80	312.00
11/22/22	JMC	Correspond with Lori Stumpf re various postings, mailing and other matters	.40	156.00
11/28/22	WOP	No Charge - Correspond with Jeff Shaw re fee application; Correspond with Joe re same	.40	N/C
12/06/22	JMC	No Charge - Review and revise sixteenth fee application; Correspond with Jon Hafen re the same	.80	N/C
12/07/22	JMC	No Charge - Review and revise Rust sixteenth fee application; Correspond with Jon Hafen and the CFTC and Utah department of securities regarding the same	1.80	N/C
12/13/22	JMC	No Charge - Correspond with Jennifer Karb re sixteenth fee application	.10	N/C
12/14/22	JMC	No Charge - Correspond with the government re the fee application; Coordinate the filing and service of the same	.80	N/C
12/15/22	JMC	No Charge - Review order approving fee application; Begin calculation of fees; Review agreements re legal services	1.30	N/C
12/28/22	JMC	No Charge - Review and analyze Rust fees collected and most recent fee application; Calculate payment; Coordinate payment of fees	1.40	N/C

Invoice: 921730
Rust Rare Coin Receivership
Administration of Receivership Estate

January 15, 2023
Client: 176430
Matter: 1

Date	Tkpr	Description	Hours	Amount
12/29/22	JMC	No Charge - Coordinate execution of fee application payments; Correspond with Jon Hafen and Caralee Marsh re payments	1.40	N/C

TOTAL PROFESSIONAL SERVICES **$ 8,448.70**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	390.00	9.00	3,510.00
Walter O Peterson	240.00	14.70	3,528.00
Susan Bailey - Paralegal	200.00	5.60	1,120.00
Jessica Houf - Paralegal	153.00	1.90	290.70
TOTALS		**31.20**	**$ 8,448.70**

COSTS ADVANCED

Date	Description	Amount
10/21/22	Grasshopper.com	19.00
11/18/22	PACER Electronic Court Records	2.40
11/21/22	Grasshopper.com	19.00
12/21/22	Grasshopper.com	19.00

TOTAL COSTS ADVANCED **$ 59.40**

TOTAL THIS INVOICE **$ 8,508.10**
Less Applied Credits $ -74.84

BALANCE DUE THIS INVOICE **$ 8,433.26**

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

January 15, 2023

Invoice: 921730
Client: 176430
Matter: 1

REMITTANCE ADVICE

RE: Administration of Receivership Estate

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Rust Rare Coin Receivership

January 15, 2023

Invoice: 921731
Client: 176430
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Asset Analysis & Recovery

Professional Services	$ 282,982.70
Total Costs Advanced	$ 545.92
TOTAL THIS INVOICE	**$ 283,528.62**

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/27/22	JAB	Review correspondence from Rodger Burge; Check claims sheet	.10	34.00
10/03/22	JMC	Correspond with Wally Bugden re Denise Rust; Correspond with Jeff Balls re claims and various clawback actions; Correspond with Jon Hafen re various settlements	2.50	975.00
10/03/22	RMB	Review Troy Piantes counter-offer and evaluate settlement payment options; Review Troy Piantes investment records and statements in connection with evaluating Troy Piantes counter-offer; Review and evaluate additional documentation from Miriam Martinez and Luisa Marquez claimed by the same to support initial investments made in Silver Pool; Evaluate collectability of Larry Milligan default judgment	2.60	988.00
10/03/22	MTH	Review receiver's report and declaration of Ray Strong in preparation of discovery responses in Larsen matter; Continue drafting discovery responses in Larsen matter; Conference with Claire McGuire re Larsen matter and other cases	1.60	592.00
10/03/22	JAB	Telephone conference with Joe Covey re matters and claims	.30	102.00
10/03/22	CMM	Call with Jeff Shaw re Larsen production and documents to be included	.20	46.00
10/03/22	CMM	Communicate with paralegals Susie Bailey and Jessie Houf re production issues; Review settlement negotiations emails related to several potential claw back defendants; Collect documents for Larsen production; Review documents for the same	4.70	1,081.00
10/03/22	CMM	Attorney conference with Michael Hoppe re entities associated with Rust and timing of responses to discovery requests	.40	92.00
10/03/22	CBB	Discuss potential dismissal of Igor Kovalenko with Jon Hafen	.20	54.00
10/03/22	SB	Assist with updating the settlement payment tracking log to identify amounts past due; communications with Jessica Houf re same; Review the CD Baby email and forward to and communicate with Jessica Houf re same; Handle the IPro Eclipse database invoice; Review court filings and calendar deadlines	1.10	220.00
10/03/22	SB	Email exchange with Kimberly Sacco re document exporting issues	.10	20.00
10/03/22	JH	Review and tag documents for Claire McGuire in Eclipse responsive to Zions' production request; Respond to attorney emails re Larsen production	3.20	489.60
10/04/22	MTH	Review and revise discovery responses for Larsen; Correspond with Claire McGuire re discovery responses	.30	111.00
10/04/22	WOP	Review loan documents and emails re same for claw back investor	1.60	384.00
10/04/22	CMM	Review documents to respond to third party subpoena from Zions; Communicate with Zions counsel re the same; Draft responses to Larsen's first discovery requests; Communicate with BRG re discovery; Revise interrogatories per Michael Hoppe comments	7.20	1,656.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
10/04/22	SB	Email exchange with Vi Tran and Claire McGuire; Research document collections and data files to locate all original QuickBooks produced in this matter; Prepare a shared file of same; Research produced QuickBooks and prepare a production set of same; Email communications with Claire McGuire re same	1.20	240.00
10/04/22	SB	Communications with Claire McGuire; Research and review documents to respond to the Third-Party Subpoena from Zions Bank in the NVP matter; Modify and update inventory documents; Email exchange with Jeff Shaw and Claire McGuire re the BRG Discovery Requests materials; Troubleshoot access to same	3.60	720.00
10/04/22	JH	Review and tag documents for Claire McGuire in Eclipse responsive to Zions' production request	4.50	688.50
10/05/22	JMC	Review and revise settlement agreement for clawback; Correspond with Matt Ball re the same	.90	351.00
10/05/22	RMB	Review Dolores Batalla claw-back claim file and documents in connection with settlement and potential summary judgment motion; Review Troy Piantes settlement communications and evaluate settlement options and strategy	1.30	494.00
10/05/22	MTH	Review and revise discovery responses in Larsen; Correspond with Claire McGuire re discovery responses; Conference with Claire McGuire re document production in Larsen	1.00	370.00
10/05/22	MJB	(Hafen v. Goodsell) Conference with Joe Covey (0.1)	.10	36.00
10/05/22	CMM	Coordinate production to salt lake legal of documents for third party subpoena from Zions; Coordinate production of documents in response to Larsen's first request for documents from BRG; Draft responses to discovery requests from Richard Larsen; Revise the same; Draft requests for admission and requests for production of documents to send out in Larsen case; Revise the same; Attorney conference with Michael Hoppe and Joseph Covey re discovery issues in Larsen claw back	8.80	2,024.00
10/05/22	SB	Continue to research, review and tag documents to prepare our responses to the Larsen and to Zions Third-Party Subpoena re NVP; Review and tag the family documents; Research document collection to prepare the General Initial Disclosures, Ponzi document and the Expert Reports with their supporting documentations for production; Troubleshoot file share from BRG; Communications with Claire McGuire re same; Upload the BRG documents, the RRC Discovery Responses and the RRC Inventory documents to the vendor with instructions for processing same	7.30	1,460.00
10/05/22	JH	Review and tag documents for Claire McGuire in Eclipse responsive to Zions' production request; Request a load file for the Zions' production from the vendor	4.60	703.80
10/06/22	RMB	Review status of Guadalupe Valencia settlement; Further review of Dolores Batalla appraisal and financial forms in developing settlement recommendation; Review Troy Piantes communication re settlement	1.20	456.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
10/06/22	MTH	Review correspondence from Claire McGuire and conference with Claire McGuire re document production; Conference with Susie Bailey re expert reports; Review discovery requests; Conference with Claire McGuire re discovery responses and various case issues	.90	333.00
10/06/22	JAB	Review summary of matters handled by Briggs Matheson	.20	68.00
10/06/22	CMM	Revise Larsen Response to add Bates numbers; Review email from Jeff Shaw re changes in metals valuation for the same; Communicate with Michael Hoppe re the same; Gather documents for production; Communicate with Susie Bailey and salt lake legal re the same; Review documents for production	4.80	1,104.00
10/06/22	SB	Communications with Jessica Houf and Claire McGuire re production parameters; Continue to research, review and tag documents to prepare our responses to the Larsen and to Zions Third-Party Subpoena re NVP; Prepare the interviews and the relevant depositions for same; Rerun the NVP Production with the Designation; Continue to troubleshoot file share from BRG; Communications with Claire McGuire re same; Redact personal and private information to prepare documents for production; Troubleshoot redaction issues and fix same; Email to the vendor the specifications for preparing the documents for our responses to the Third-Party Subpoena from Zions re the NVP documents; Email exchange with Michael Hoppe re the old Expert Reports of Hafen and Strong; Add additional documents to the Larsen Production; Modify the NVP document collections and add the new Expert Reports of Hafen and Strong; Prepare a summary for Jessica Houf of the issues with the different versions of the Expert Reports; Identify document control number ranges to assist with our responses to the Larsen requests	5.10	1,020.00
10/06/22	JH	Draft updated active lawsuit spreadsheet; Locate documents responsive to Larsen production; Draft an initial disclosures index for claw backs	4.60	703.80
10/07/22	MTH	Review correspondence from Claire McGuire re discovery responses and review discovery responses; Correspond with Claire McGuire re same; Review information provided by Jeff Shaw re Larsen transactions; Correspond with Jeff Shaw re same; Review and revise discovery requests to Larsen	1.60	592.00
10/07/22	WOP	Review loan documents; Calculate interest paid on all notes	3.80	912.00
10/07/22	CMM	Finalize production to Larsen claw back; Send out production; Set up new matter for Ault breach of settlement; Draft complaint for Ault breach of settlement; Review discovery request for Sagarin claw back; Draft responses to Sagarin claw back; Communicate with experts re access to Eclipse documents; Update initial disclosures sent out to all claw back parties	5.90	1,357.00
10/07/22	CY	Draft Complaint for Ault	.20	30.00

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Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
10/07/22	SB	Download and unzip the RRC_LARSEN_PROD02 corrected load file; Upload to the databases folder; Troubleshoot removing the initial load file from the database; Clear Temp folder; Communicate with Concordance Customer Service re same; Create a new replacement database; Modify the OPT and DAT files; Run the load file, link the images and native and add the OCR; Upload the load file to share drive for production of same; Email exchange with the vendor to follow up re the NVPPROD001.2 production; Email exchange with Jeff Shaw re the Sagrin document review and database access and instruction	5.90	1,180.00
10/07/22	JH	Draft initial disclosures index for claw backs; Meet with Claire McGuire re claw back productions; Meet with Susie to manage claw back Concordance databases	4.50	688.50
10/10/22	JMC	Correspond with Matt Ball re clawback action	.20	78.00
10/10/22	MTH	Review correspondence from Claire McGuire re production and respond to same; Conference with Chauncey Bird and Claire McGuire re claw back action; Review and respond to correspondence from Darren Nelson re complaint and answer in claw back action	.70	259.00
10/10/22	JAB	Conference with Claire McGuire	.30	102.00
10/10/22	WOP	Review loan documents; Compile new spreadsheet	2.10	504.00
10/10/22	CMM	Attorney conference with Jeffery Balls re claims registry finalization and timeline for publication of Registry; Attorney conference with Chaunceton Bird re Wells group claw back and claims stipulation needed between investors and third party intermediary; Research Wells' claim and offset agreements; Review load file sent by SLL for final production to third party subpoena; Communicate with Susie Bailey and Vi Tran re issues with load file	4.80	1,104.00
10/10/22	CBB	Discuss dismissal of Igor Kovelenko with Claire McGuire and Michael Hoppe	.50	135.00
10/10/22	CBB	Review offset agreement from Claire McGuire and review Adam Wells case information for Adam Wells contact information (.3); Draft and send Adam Wells email re status of his representation (.2)	.50	135.00
10/10/22	SB	Download the RRC_NVP_PROD001.2 load file replacement; Unzip 56,163 files; Copy the materials for production of same and then cancel due to issues with the load; Troubleshoot synch issues with the helpdesk; Modify the opt and dat files; Run the load file, link the natives and images and add the OCR; Backup the database; Review issues with the load file; Rerun the OPT and to link additional images; Email exchange with Concordance re same; Email exchange with Claire McGuire re same; Email to the vendor re missing text files and blank image folders	5.40	1,080.00
10/10/22	JH	Complete draft of initial disclosure index for claw backs	2.90	443.70
10/11/22	JMC	Correspond with Lori Stumpf and Jeff Balls re discovery responses; Correspond with Briggs Matheson and Jeff Balls re cases; Correspond with Jon Hafen and Matt Ball re clawback settlement	1.20	468.00

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January 15, 2023
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Date	Tkpr	Description	Hours	Amount
10/11/22	MJB	(Hafen v. Howell) Correspond with Ray Strong and Jon Hafen (0.1); Correspond with Joe Covey (0.1); Attend status conference (0.4); Correspond with Joe Covey and Jeff Balls (0.2); Review pleadings (0.5)	1.30	468.00
10/11/22	MJB	(Hafen v. Goodsell) Correspond with Joe Covey (0.1); Correspond with Shaun Peck (0.1)	.20	72.00
10/11/22	JAB	Conference with Briggs Matheson and Claire McGuire; Review motions to exclude testimony of Ray Strong and Jonathan Hafen	1.30	442.00
10/11/22	BJM	Intraoffice conference with Jeff Balls and Claire McGuire re Taylor, Fields, and Cash Recipient case statuses and planning (.7); Email John Swallow re Fields settlement negotiations (.1)	.80	248.00
10/11/22	CMM	Communicate with Susie Bailey re issues with Lugli production; Review Strong and Hafen report and included appendix; Review documents to be produced in the same; Send production link to Zions counsel	5.60	1,288.00
10/11/22	SB	Modify and update the Hafen v Richard Larsen production database	1.00	200.00
10/11/22	SB	Review documents in the NVP_PROD001.2 database; Communications with the vendor re issues with same; Review with the vendor load file issues for Relativity; Zip new files and upload them to a share file for production; Troubleshoot share file; Cancel and send the link from the vendor to Clair McGuire for production of same; Concordance teams meeting with Jessica Houf to review issues with images loading and viewer selection issues	4.00	800.00
10/11/22	SB	Review and comment on the production summary from Jessica Houf	.30	60.00
10/11/22	JH	Complete initial disclosure index incorporating new database edits; Load initial disclosure documents into Concordance with Susie Bailey	5.20	795.60
10/12/22	JMC	Correspond with Matt Ball and Jeff Balls re Howell opposition to motion to exclude evidence; Review and analyze objections	.50	195.00
10/12/22	RMB	Communicate with Brandon Smith re Guadalupe Valencia settlement status ; Review communications re Zions Bank subpoena for Lugli state court action and responsive documents	1.30	494.00
10/12/22	MTH	Review and respond to correspondence from Claire McGuire re discovery responses to Larsen; Review correspondence from opposing counsel and review rules re discovery responses in Larsen case; Conference with Claire McGuire re supplemental responses; Review and revise Receiver's discovery requests to Larsen; Correspond with Claire McGuire re same	1.20	444.00
10/12/22	JAB	Review correspondence from Briggs Matheson; Review status of cases	.50	170.00
10/12/22	WOP	Analyze loan payments made by investor	1.70	408.00
10/12/22	CMM	Call with Walter Peterson re issues with potentially secured investor; Draft email re commissions scheme to Walter Peterson re the same; Revise production to third party subpoena	2.80	644.00
10/12/22	CBB	Call with Adam Wells to discus Igor Kovalenko collection matter and case status (.4); Discuss call with Claire McGuire and discuss case status and strategy (.4)	.80	216.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
10/12/22	SB	Update the RRC_Larsen database with replacement files; Backup the database; Email to Michael Hoppe re same	1.20	240.00
10/12/22	JH	Review collected settlement agreements and ledger from Kathy Bates; Revise settlement tracking spreadsheet	4.40	673.20
10/13/22	JMC	Correspond with Matt Bolneck re Taylor lawsuit; Correspond with Jon Hafen re stagging of clawback actions and related issues	.80	312.00
10/13/22	MJB	(Hafen v. Howell) Research and draft opposition memoranda re motions to exclude (2.2)	2.20	792.00
10/13/22	CMM	Review claims submitted by investor asserting secured loans; Review discovery responses to Larsen in light of opposing counsels request to further designate; Attorney conference with Michael Hoppe re supplemental responses	3.90	897.00
10/13/22	CBB	Review case master claw back index and document produced in Wells group production in preparation for drafting claim stipulation	.40	108.00
10/13/22	JH	Respond to attorney emails re claw back cases; Draft updated settlement tracking spreadsheet	4.50	688.50
10/14/22	JMC	Correspond with Matt Barneck re Taylor clawback action, discovery deadlines and related issues; Coordinate transition of clawback cases from Briggs Matheson; Correspond with Walter Peterson re clawback matters	1.30	507.00
10/14/22	JAB	Review and edit discovery responses for Sagarin; Review correspondence	1.10	374.00
10/14/22	WOP	Research ucc-9; Research avoidable transfers under UFTA	4.90	1,176.00
10/14/22	CMM	Review documents for Sagarin claw back discovery responses; Call with Jessie Houf re the same; Draft Sagarin discovery responses	2.60	598.00
10/14/22	CMM	Attorney conference with Jeffery Balls re Sagarin discovery responses; Finalize and send Sagarin discovery responses	.80	184.00
10/14/22	JH	Respond to attorney inquiries re claw back cases; Meet with Claire McGuire re Sagarin request; Review and confirm admissions in drafted Sagarin request	3.50	535.50
10/17/22	JMC	Correspond with Matt Ball re clawback settlement; Correspond with Jeff Balls re clawback settlement payment	.40	156.00
10/17/22	RMB	Review documents produced to Zions Bank in connection with preparation of claw-back claims and development of litigation strategy for Lugli claw-back action	1.30	494.00
10/17/22	MJB	(Hafen v. Goodsell) Revise settlement agreement (0.2); Correspond with Jon Hafen (0.1); Correspond with Shaun Peck (0.1)	.40	144.00
10/17/22	JAB	Review emails and documents from Briggs Matheson; Conference with Joseph Covey; Telephone conference with John Swallow; Email John Swallow re settlement; Review settlement agreement for Goodsells	2.50	850.00
10/17/22	WOP	Review Larsen metal agreement; Correspond with Claire re same; Research UCC re securing investments; Research attachment and perfection	4.80	1,152.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
10/17/22	CMM	Review document production issue emails for third party subpoena; Communicate with Zions counsel and Susie Bailey re the same; Attorney conference with Jeffery Balls re claims registry schedule; Review and respond to email with Walter Peterson re secured investor issue	1.80	414.00
10/17/22	SB	Review and respond to emails from Vi Tran and Clair McGuire re the load file with our responses to Zion's requests re the Lugli NVP related documents; Review the load file and discrepancies with same; Troubleshoot issues and page count issues re same; Telephone call and email exchanges with the vendor re same; Request an update and correct load file for same; Download the replacement load file; Unzip and review same; Email exchange with the vendor re same; Troubleshoot downloading and synchronizing issues; Telephone conference with the Helpdesk re same; Prepare a new secured link and share with the team; Download the replacement materials; Unzip the files; Modify the OPT and DAT files; Troubleshoot download; Request a thumb drive from the vendor	4.60	920.00
10/17/22	JH	Draft settlement tracking spreadsheet to review and track payments received; Draft summary of issues to resolve re settlement tracking; Respond to attorney inquiries re claw back settlements	4.60	703.80
10/18/22	RMB	Review Dolore Batalla real property appraisal; Evaluate potential settlement options for Dolores Batalla and refinancing property; Communicate with Robb Jones re Dolores Batalla appraisal; Review docket for Dearden claw-back action;	.80	304.00
10/18/22	MJB	(Hafen v. Howell) Research and draft opposition to motions to strike (3.1)	3.10	1,116.00
10/18/22	JAB	Review settlement status of various matters; Review correspondence from Jesse Houf	.30	102.00
10/18/22	CMM	Settlement follow up discussions re entity Gaylen invested in; Review Larsen disclosures to draft supplemental disclosures; Review materials from Jessie Houf re defaults on settlements; Attorney conference with Jessie Houf re the same	1.70	391.00
10/18/22	SB	Prepare a secured share file and produce the replacement NVP_PROD001.2 production to Zions re the Lugli NVP matter	.40	80.00
10/18/22	JH	Respond to emails re settlement agreements for the Receivership; Investigate, review, and update settlement agreement tracking for claw back cases	3.90	596.70
10/19/22	RMB	Review communications relating to subpoenas served in Lugli Zions Bank state court action; Conference with Claire McGuire re Lugli and Zions Bank subpoenas; Preparation of objections to Zions Bank subpoena for state court action	1.30	494.00
10/19/22	MJB	(Hafen v. Howell) Research and draft opposition memoranda (3.3)	3.30	1,188.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
10/19/22	CMM	Discuss secured investor issues with Walter Peterson; Prepare claims and transfer files re the same; Research settlement agreement with potential client; Draft supplemental response for Larsen discovery requests; Research and send documents in response to third party subpoena in Zions lawsuit	5.70	1,311.00
10/19/22	CY	Draft Supplemental Response to Production of Documents	.30	45.00
10/19/22	SB	Research in the database; Email to the vendor requested natives re the NVP production; Email the requested natives to Vi Tran	.50	100.00
10/19/22	SB	Review the email and attachment from Vi Tran re the BRG Exhibit 3 re the documents relied upon; Research several collections of documents to locate same; Email exchange with Claire McGuire re same; Email to Vi Tran re progress with same	1.50	300.00
10/19/22	JH	Respond to emails re settlement agreements for the Receivership; Investigate, review, and update settlement agreement tracking for claw back cases	4.20	642.60
10/20/22	MJB	(Hafen v. Howell) Research and draft opposition to motion to exclude report of Ray Strong (2.1)	2.10	756.00
10/20/22	JAB	Telephone conference with Jeff Shaw re Jill Sagarin; Correspond with Claire McGuire re same; Conference with Joseph Covey; Correspond with Ryan Pahnke re deposition	1.40	476.00
10/20/22	CMM	Communicate with opposing counsel and Jeffery Balls re deposition dates and discovery issues in the Sagarin matter; Correspond with Jessie Houf re productions and settlement issues; Revise Larsen discovery requests	2.80	644.00
10/20/22	SB	Email a summary of the Supplemental documents Vi Tran is requesting to Claire McGuire for comments; Research to locate and produce the 2021 Hafen and Strong Expert Reports; Email exchange and telephone call with Clarie McGuire re producing same; Prepare a share file for the FBI interviews; Email to Claire McGuire re producing same	3.90	780.00
10/20/22	SB	Communications with Jessica Houf and Daniel Zarkou re the old Expert Reports and load file and production of same; Email to Cynthia Love to verify they were not produced; Prepare the new Expert Reports to produced and to replace the previous versions in the database with the same numbering system	1.50	300.00
10/20/22	JH	Respond to emails re settlement agreements for the Receivership; Investigate, review, and update settlement agreement tracking for claw back cases	3.20	489.60
10/21/22	MJB	(Hafen v. Goodsell) Correspond with Jon Hafen and Joe Covey (0.1)	.10	36.00
10/21/22	MJB	(Hafen v. Howell) Research and draft opposition to motion to exclude Ray Strong's testimony (3.8); Correspond with Joe Covey and Jeff Balls (0.1)	3.90	1,404.00
10/21/22	JAB	Review oppositions to motion to exclude expert reports	.60	204.00
10/21/22	CMM	Draft and revise supplemental discovery responses for Larsen matter; Communicate with Zions counsel re third party subpoena	3.80	874.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
10/21/22	CMM	Attorney conference with Susie Bailey re further requests from Zion counsel in third party subpoena; Research RRC document production files; Discuss privilege issues with Susie Bailey and Jeffery Balls as related to work done by BRG	3.80	874.00
10/21/22	SB	Prepare a summary of the supplemental documents Vi Tran is still needing; Email same to Jessica Houf re same; Review the issues re the load file of the old Expert Report and production of same; Update the supplemental folder of requested items for Vi Tran; Email to Claire McGuire to review and approve same; Email the Supplemental documents to Vi Tran of Zions re the NVP matter; Prepare and send the control numbered Gaylen Rust Plea Agreement to Claire McGuire; Telephone call with Cynthia Love re the BRG Experts and privileged documents; Email to Claire McGuire re same; Review email from Jessica Houf re same	5.00	1,000.00
10/24/22	JMC	Correspond with Walter Peterson re clawback analysis, loans and inquiry notice standard; Correspond with Jeff Ball re clawback settlement	1.00	390.00
10/24/22	RMB	Conference with Jeff Balls re Dolores Batalla claim and claw-back action, and B & B Land and Livestock claim; Preparation of Motion for Partial Summary Judgment against Dolores Batalla	4.20	1,596.00
10/24/22	MTH	Review and respond to correspondence from Claire McGuire re discovery responses; Review supplemental discovery responses; Meeting with Claire McGuire to revise supplemental discovery responses and receiver's first set of discovery requests in Larsen; Review notification from court on Darren Nelson matter; Conference with Claire McGuire re strategy on discovery requests to Larsen; Review and evaluate information from Darren Nelson re lawsuit; Review and respond to Joe Covey re Darren Nelson suit; Begin drafting attorney planning meeting report for Darren Nelson matter	2.40	888.00
10/24/22	JAB	Correspond with Jonathan Hafen; Draft expert disclosures; Review status of matters	1.90	646.00
10/24/22	CMM	Attorney conference with Michael Hoppe re Larsen discovery requests; Draft discovery requests for beneficiary defendants; Communicate with Rodger Burge re potential subpoena	4.80	1,104.00
10/24/22	JH	Investigate, review, and update settlement agreement tracking for claw back cases; Manage and organize receipts for Receivership; Correspond with attorneys re settlement agreements	4.40	673.20
10/25/22	RMB	Communicate with Brandon Smith re Guadalupe Valencia settlement payment issues; Teleconference with Jeff Shaw re declaration for Dolores Batalla motion for partial summary judgment; Communicate with Ray Strong re report for Dolores Batalla motion for partial summary judgment; Communicate with Robb Jones re Dolores Batalla settlement options and identify of any co-investor distributions; Prepare motion for partial summary judgment for Dolores Batalla; Review Jeff Shaw declaration and assist in preparation of same	5.20	1,976.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
10/25/22	MTH	Review correspondence from Jessica Houf re settlement agreements on two matters; Review files and respond to queries from Jessica Houf; Review court order re Darren Nelson case; Conference with Joe Covey re case	.80	296.00
10/25/22	MJB	(Hafen v. Howell) Correspond with Jon Hafen and Joe Covey (0.1); Finalize opposition memoranda (0.2)	.30	108.00
10/25/22	JAB	Review status of litigation matters; Review settlements; Conference with Jesse Houf	4.00	1,360.00
10/25/22	SB	Email exchange with Claire McGuire and Jeff Shaw; Research in the original files of documents sent to the vendor for processing; Locate all QuickBooks native files; Prepare a RRC QuickBooks folder and share file location with the team; Create a secured shared drive and send them to Jeff Shaw; Email to Claire McGuire to approve of same	1.10	220.00
10/25/22	JH	Investigate, review, and update settlement agreement tracking for claw back cases; Request and process signed settlement agreements; Correspond with attorneys re settlement agreements	5.60	856.80
10/26/22	RMB	Prepare motion for partial summary judgment for Dolores Batalla claw-back claim; Review email from Ray Strong re expert report for summary judgment motions; Review Subpeona from Lugli group in Zions Bank state court action; Conference with Jeff Balls re Luglis subpoena; Review email from Robb Jones re Dolores Batalla settlement	1.90	722.00
10/26/22	MTH	Draft attorney planning meeting report in Darren Nelson matter per court order; Correspond with Darren Nelson re court order and attorney planning meeting report; Review and respond to correspondence from Darren Nelson re case plan and attorney planning meeting report	1.50	555.00
10/26/22	JAB	Review expert report of Ray Strong; Conference with Jon Hafen re matters; Conference with Claire McGuire and Rodger Burge re subpoena; Review status of settlements; Review settlement offer from John Swallow	2.60	884.00
10/26/22	CMM	Prepare for and attend claims approval meeting with Jeffery Balls and Jonathan Hafen; Revise callback matrix; Identify future lawsuit targets for new attorneys	4.80	1,104.00
10/26/22	CMM	Research third party subpoena from Lugli defendants; Recover emails from departed attorney researching the same	1.90	437.00
10/26/22	SB	Email exchange with Vi Tran to assist her with accessing the Dropbox; Reset the password and email same	.20	40.00
10/26/22	JH	Organize and manage RRC receipts, emails, and settlement agreements; Correspond with attorneys re settlement agreements; Complete settlement tracking spreadsheet and review	4.10	627.30
10/27/22	JMC	Correspond with Jeff Balls and Rodger Burge re clawback action and subpoena; Correspond with Trevor Lang re subpoena and response; Correspond with Matt Barneck re Taylor discovery dates; Review stipulation to extend dates	2.80	1,092.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
10/27/22	RMB	Prepare motion for partial summary judgment for Dolores Batalla claw-back claim; Conference with Jeff Balls re Lugli investment group subpoena to Receiver and service issues and possible objections; Communicate with Jeff Shaw re Dolores Batalla summary judgment motion preparation and supporting declaration; Prepare status update for court in Dolores Batalla claw-back action; Communicate with Robb Jones re status of Dolores Batalla claw-back claim and settlement; Communicate with Ray Strong re expert reports issues in connection with summary judgment motions	4.70	1,786.00
10/27/22	JAB	Telephone conference with Jeff Shaw; Review settlement documents; Review subpoena from North Valley Partners; Conference with Claire McGuire; Conference with Rodger Burge and Joseph Covey; Draft settlement agreement for Fields	3.40	1,156.00
10/27/22	JH	Request and process signed settlement agreements; Update settlement agreement tracking spreadsheet and NetDocs; Begin review and revision of active lawsuit tracking for RRC; Meet with Susie Bailey re updating the deposition index and production log	4.50	688.50
10/28/22	JMC	Review and analyze several settlement agreements for clawbacks; Correspond with Jon Hafen, Matt Ball, Jeff Balls and others re the same	3.30	1,287.00
10/28/22	RMB	Communicate with Jeff Shaw re preparation of declaration for Dolores Batalla motion for partial summary judgment and issues in connection with Ray Strong expert report; Communicate with Robb Jones re status report;	.70	266.00
10/28/22	MTH	Review correspondence from Darren Nelson re attorney planning meeting report and schedule; Revise attorney planning meeting report and correspond with Darren Nelson re same	.90	333.00
10/28/22	MTH	Review correspondence from Darren Nelson re process and respond to same	.10	37.00
10/28/22	JAB	Conference with Claire McGuire re subpoena; Conference with Jeff Shaw re same; Review correspondence re subpoena; Revise settlement agreement for Fields; Call Steve Waterman re settlement; Conference with Joseph Covey; Draft dismissal of McGrath matter	3.10	1,054.00
10/28/22	WOP	Continue review of loan documents; Review investor communications with Rusts; Prepare draft summary of the same	3.30	792.00
10/28/22	CMM	Communicate with Jeffery Balls and Susie Bailey re privilege issues and outstanding requests from third party subpoena; Research remaining issues for third party subpoena; Revise objections in claims registry	3.60	828.00
10/28/22	SB	Email exchange with Jeff Shaw; Review QuickBooks folders and productions; Email exchange with Claire McGuire; Draft a list of the documents outstanding from Zions NVP document requests and subsequent email requests received from Vi Tran and email the same to Claire McGuire	.70	140.00
10/28/22	JH	Review and revise active lawsuit tracking spreadsheet for RRC claw backs; Correspond with Claire McGuire re Zions production	4.50	688.50

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
10/29/22	JAB	Review quarterly status report; Review pleadings and status of case	.50	170.00
10/31/22	JMC	Correspond with Jeff Balls and Claire McGuire re Denise Rust, Josh Rust, Zions Bank and Jacobson litigation matters	1.40	546.00
10/31/22	RMB	Communicate with Jeff Shaw re preparation of declaration for Dolores Batalla motion for partial summary judgement; Revise and filed Status Update for Dolores Batalla claw-back claim	.40	152.00
10/31/22	MTH	Review correspondence from Darren Nelson re case; Begin drafting motion for scheduling conference	.40	148.00
10/31/22	JAB	Review correspondence re Josh Rust matter; Review edits to Goodsell settlement agreement; Revie status of litigation; Conference with Joseph Covey re Zions settlement claims process; Review documents re Zions settlement claims process	2.50	850.00
10/31/22	CMM	Review settlement agreement with Denise Rust and restitution agreement with Josh Rust; Draft analysis of sale of home re to criminal restitution order	1.50	345.00
10/31/22	SB	Update the OneDrive claim and claw back tracking folder and share it with Jessica Houf; Review and comment on the RRC Production Summary with same	.70	140.00
10/31/22	JH	Review and revise active lawsuit tracking spreadsheet for RRC claw back matrix	1.90	290.70
11/01/22	JMC	Correspond with Jeff Balls and Ray Strong re subpoena	.50	195.00
11/01/22	MTH	Continue drafting motion for initial scheduling conference; Correspond with Joe Covey and Claire McGuire re case schedule	.70	259.00
11/01/22	JAB	Correspond with Matthew Barneck; Review correspondence to court re Gaylen Rust deposition; Review amended scheduling order; Review subpoena; Review clawback matters; Review litigation status of ongoing cases	3.10	1,054.00
11/01/22	CMM	Review and revise scheduling order sent by Michael Hoppe re to Darren Nelson; Update settlement tracker and claw back matrix; Review documents to respond to third party subpoena	4.60	1,058.00
11/01/22	SB	Review and modify database files re HafenProd006; Modify and troubleshoot load files and replacements for same; Update production files; Review email exchange with Jeff Shaw re scheduling changes; Email exchange re payments	3.00	600.00
11/01/22	JH	Review active lawsuits and revise active lawsuit tracking spreadsheet for RRC claw back matrix; Respond to inquiries re claw backs from RRC attorneys	5.50	841.50
11/02/22	JMC	Review Nelson scheduling motion; Correspond with Michael Hoppe re the same; Correspond with Ray Strong and others re discovery requests	1.40	546.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
11/02/22	RMB	Review Zions bank subpoena and production; Review Lugli investor group Subpoena and evaluate potential objections and identify responsive documents; Review Lugli investor group produced documents in connection with analyzing claw-back claim litigation strategy and response to Subpoena; Review Mike & Patty Dearden and Mary LaJean investment activity files; Review Augustin Rico investment activity files	2.40	912.00
11/02/22	MTH	Review and respond to correspondence from Joe Covey and Claire McGuire re case; Finalize motion for scheduling conference and coordinate filing	.40	148.00
11/02/22	JAB	Review subpoena; Conference with Ray Strong, Jeff Shaw, Joseph Covey, and Claire McGuire; Review status of litigation; Telephone conference with Mark Anderson	2.50	850.00
11/02/22	CMM	Review scheduling order for Darren Nelson matter; Attorney conference with Jeffery Balls re schedule for registry; Review communications re class action settlement and docket text sent by class counsel	2.60	598.00
11/02/22	JH	Review active lawsuits and revise active lawsuit tracking spreadsheet for RRC claw back matrix; Respond to inquiries re claw backs from RRC attorneys	3.70	566.10
11/03/22	JMC	Correspond with Trevor Lang, Jeff Balls and Rodger Burge re discovery responses in North Valley Partners vs. Zions matter	.70	273.00
11/03/22	RMB	Review document production for Zions Bank in Lugli group state court action and compare Lugli group subpoena document categories; Analyze potential privilege and burdensome objections to Lugli group subpoena on Receiver; Conference with Jeff Balls re issues arising from Lugil group subpoena of Receiver documents; Meet and confer teleconference with Trevor Lang and Jeff Balls re Lugli group subpoena production and related issues; Review and analyze Troy Piantes settlement issues and related investment documents; Further analysis and review of Lugli investment activities and supporting documents in connection with preparation of Complaint and litigation strategy	6.20	2,356.00
11/03/22	JAB	Conference with Rodger Burge and Joseph Covey; Telephone conference with Trevor Lang; Conference with Claire McGuire and Joseph Covey re responsive documents;	2.40	816.00
11/03/22	CMM	Attorney conference with Jeffery Balls re final approvals needed from Jonathan Hafen for claims registry; Review and analyze claims issues for metals claims; Update claw back case tracker; Review filings and scheduling order in claw back matter; Attend to discovery matters in responding to third party subpoena including size and transfer issues	4.80	1,104.00
11/03/22	JH	Review active lawsuits and revise active lawsuit tracking spreadsheet for RRC claw back matrix; Respond to inquiries re claw backs from RRC attorneys	4.20	642.60
11/04/22	JMC	Correspond with counsel for clawback defendant re settlement offer and bankruptcy analysis	.40	156.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
11/04/22	RMB	Prepare Objection to Lugli group Subpoena in state court action with Lawsuit; Further analysis of privilege and other objections to same; Further negotiation of Dolores Batalla settlement; Review investment documents of Larry Milligan for default judgment	2.40	912.00
11/04/22	MTH	Correspond with Claire McGuire re supplement responses and first set of discovery requests in Larsen matter	.10	37.00
11/04/22	JAB	Email Trevor Lang re subpoena; Conference with Claire McGuire re production; Review correspondence re tax issues	.50	170.00
11/04/22	CMM	Communicate with Jessie Houf re Rust management and settlement project; Review active lawsuit tracker and follow up with various attorneys re status of stayed cases; Review documents for production in response to various requests; Research and draft email summary re payroll tax issues in the event of eventual distribution to claimants for wages	4.50	1,035.00
11/04/22	JH	Review active lawsuits and revise active lawsuit tracking spreadsheet for RRC claw back matrix; Email a summary of active lawsuits to RRC attorneys and paralegals; Respond to inquiries re claw backs from RRC attorneys	4.20	642.60
11/07/22	JMC	RIGHT MATTER? Correspond with Jeff Balls re various Rust settlements	.30	117.00
11/07/22	RMB	Review status of Dolores Batalla setlement offer; Review Peggy Hennings investment documentation and analysis; Review Larry Milligan file and investment activity in connection with preparation of default judgment papers	1.20	456.00
11/07/22	MTH	Review correspondence from opposing counsel re depositions in Larsen matter; Conference with Claire McGuire re deposition of Gaylen Rust and correspond with opposing counsel re same; Conference with Court clerk re filing of Darren Nelson answer; Review and respond to correspondence from Darren Nelson re filing	.80	296.00
11/07/22	MJB	(Hafen v. Howell) Prepare for oral argument on MSJ (5.7)	5.70	2,052.00
11/07/22	JAB	Review objections to North Valley Partners subpoena; Conference with Chauncey Bird re matters; Revie status of Wells matter, Muir matter, and Percell matter; Telephone conference with Daniel McCain; Review documents from BRG	2.10	714.00
11/07/22	CMM	Update Jeff Shaw on claw back matrix; Negotiate extensions due to penitentiary restrictions on deposition for Muir and Percell cases; Review latest deposition updates for Taylor case; Review documents sent by Jeff Shaw to respond to third party subpoena	6.60	1,518.00
11/07/22	CBB	Discuss upcoming discovery deadlines with Jeff Balls (.2); Send follow up emails to opposing counsel in Muir and Percell matters re settlement discussions and discovery deadlines and discuss with opposing counsel in subsequent emails (.4)	.60	162.00
11/08/22	JMC	Correspond with Matt Ball re Howell case, hearing and strategy going forward; Correspond with Jeff Balls re discovery issues	.80	312.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
11/08/22	MJB	(Hafen v. Howell) Prepare for oral argument (0.4); Correspond with Holly Boux (0.1); Conference with Joe Covey (0.1)	.60	216.00
11/08/22	MJB	(Hafen v. Goodsell) Correspond with Jon Hafen (0.1)	.10	36.00
11/08/22	JAB	Prepare for deposition of Jill Sagarin; Review Wells litigation status; Conference with Claire McGuire; Telephone conference with Jeff Shaw and Leif Larsen; Correspond with Ryan Pahnke	7.20	2,448.00
11/08/22	CMM	Revise supplemental production responses for Larsen case; Revise first set of discovery requests for to Larsen; Review documents produced to Receiver by Larsen; Review emails re settlement with investor as negotiated by Cynthia Love; Draft settlement agreement for the same investor; Review amended scheduling order sent by opposing counsel in Muir claw back case; Add particular bates ranges to supplemental discovery responses in various claw back matters; Review correspondence with opposing counsel in Sagarin claw back	8.10	1,863.00
11/08/22	CBB	Review stipulated motions to amend discovery deadlines in Muir and Wells matters and approve of proxy signature	.20	54.00
11/09/22	JMC	Correspond with Jeff Shaw, Jeff Balls and Ray Strong re litigation issues	.40	156.00
11/09/22	JAB	Review and revise settlement agreement for Gregory class action (1.5); Telephone conference with Joseph Covey, Jeff Shaw, and Ray Strong; Telephone conference with Judson Pitts; Email Jon Hafen re settlement; Review correspondence re deposition of Gaylen Rust	3.70	1,258.00
11/09/22	CMM	Review settlement agreement, statute email and docket text sent by class counsel in Gregory matter; Communicate with opposing counsel in claw back matter re pushing out of deadlines for discovery	1.50	345.00
11/09/22	CMM	Communicate with outside counsel and jail re availability of Gaylen Rust for depositions; Draft email re research for claw back attorneys	1.60	368.00
11/09/22	CBB	Call with Jeff Balls re status of Wells Group claims and communications	.40	108.00
11/10/22	JAB	Review Gregory settlement agreement and Gregory Class notice; Conference with Joseph Covey re same; Email same to Beth Boland and Paul Scarlato; Telephone conference with Joseph Covey, Beth Boland, and Paul Scarlato; Draft motion to amend scheduling order for Wade litigation; Email same to Judson Pitts	5.50	1,870.00
11/10/22	CMM	Review comments for documents sent to Gregory counsel; Meeting with outside counsel re the same; Review initial disclosures and update with new documents	2.60	598.00
11/10/22	CBB	Discuss Muir and Wells group matter with Jeff Balls and provide additional documentation	.30	81.00
11/10/22	JH	Review and update the claw back matrix with revised settlement and active lawsuit tracking	1.20	183.60
11/11/22	RMB	Review Troy Piantes settlement correspondence and evaluate potential assets for settlement; Review Mike Johnson claw-back claim file	1.60	608.00
11/11/22	MTH	Review discovery responses and requests in Larsen matter and correspond with Claire McGuire re same	.30	111.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
11/11/22	MTH	Review and revise first discovery requests in Larsen matter and correspond with Claire McGuire re same (.3)	.30	111.00
11/11/22	JAB	Draft notice of settlement distribution plan; Correspond with Paul Scarlato; Review settlement agreement for Goodsell; Review Gregory class notice; Review Sagarin emails and documents	3.00	1,020.00
11/11/22	CMM	Correspond with Michael Hoppe re supplemental responses and discovery requests in Larsen case; Revise discovery requests per comments from Michael Hoppe; Review issues with claim that may be subject to claw back action; Attend to discovery issues for various claw back actions; Draft supplemental production responses	3.10	713.00
11/11/22	JH	Review and update the claw back matrix with revised settlement and active lawsuit tracking; Research questions for Jeff Balls re Sagarin claw back and Lambert agreement	4.80	734.40
11/14/22	MTH	Review correspondence to opposing counsel and attached supplemental discovery responses and requests to Richard Larsen; Review notifications from Court; Review orders from Court and correspond with Darren Nelson re same	.60	222.00
11/14/22	JAB	Draft notice of settlement distribution plan; Telephone conference with Paul Scarlato; Telephone conference with Ryan Pahnke; Draft amended scheduling order for Sagarin matter	5.30	1,802.00
11/14/22	CMM	Review documents to respond to third party subpoena from north valley partners; Finalize Larsen discovery requests and serve the same; Review claims that are indicated in claw back actions; Review final settlement agreement as send by Zions counsel; Review filing in Sagarin claw back	4.80	1,104.00
11/14/22	JH	Review and revise claw back matrix to include updated settlement agreements and active lawsuits	1.20	183.60
11/15/22	JMC	Correspond with Jeff Balls and Claire McGuire re discovery issues in clawback actions	.60	234.00
11/15/22	RMB	Finalize Objections to Zions Bank subpoena and communicate with Trevor Lang re subpoena objections and production	.30	114.00
11/15/22	MTH	Review case issues re Richard Larsen; Telephone conference with Josh Lee re discovery requests in Richard Larsen matter; Conference with Claire McGuire re case strategy	.60	222.00
11/15/22	JAB	Conference with Joseph Covey and Claire McGuire; Review notice re scams; Correspond with Trevor Lang; Conference with Jesse Houf; Email Matthew Barneck	2.20	748.00
11/15/22	CMM	Review documents sent by BRG in response to third party subpoena; Attorney conference with Jeffery Balls re the same and privilege questions; Research and draft settlement with investor	4.90	1,127.00
11/15/22	JH	Prepare documents in response to subpoena for NVP v. Zions; Add updated scheduling orders to the active lawsuit tracking; Consult with Jeff Balls re subpoena production for NVP v. Zions	1.40	214.20

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
11/16/22	JMC	Correspond with Robert Wing, Tom Melton, Jeff Balls and others re litigation matters and settlements; Correspond with Jeff Balls re various settlements	1.00	390.00
11/16/22	MJB	(Hafen v. Goodsell) Revise motion to approve settlement agreement (0.4); Correspond with Joe Covey (0.1)	.50	180.00
11/16/22	JLO	Meet and discuss clawback actions and claims; Review and discuss applicable court opinions	1.90	684.00
11/16/22	JAB	Review clawback actions; Conference with Claire McGuire; Conference with Jonathan Hafen, Joseph Covey, Robert Wing, Tom Melton, Joni Ostler, and Claire McGuire re clawback actions	2.70	918.00
11/16/22	CMM	Attorney meeting with client, Jeffery Balls, Joni Olster, Tom Melton, Robert Wing and Jonathan Hafen to determine new cases to be filed; Manage claw back matrix and case assignment; Research work product privilege as related to expert discovery and materials used in creating report; Review documents sent by BRG for production; Coordinate entry of scheduling orders in claw back actions; Draft and enter notices of substitution of counsel and appearances for new attorneys taking over claw back actions	8.80	2,024.00
11/16/22	CY	Draft notice of appearance for Robert Wing, Thomas Melton for Ellingford and Call case; Draft notice of substitution for Joni Ostler for Ellingford and Call case	1.30	195.00
11/16/22	RGW	Meet with Rust team re assignment of matters; Communicate with expert; Review expert report; Research	5.80	2,610.00
11/16/22	TMM	Conference re status, assignments; Review receivership reports	5.50	2,475.00
11/16/22	JH	Manage documents for NVP v. Zions subpoena production; Check and respond to emails from RRC attorneys; Organize documents and draft a guide to RRC and ten specific claw back cases for Joni Ostler, Tom Melton, and Robert Wing	5.30	810.90
11/17/22	JMC	Review research re turnover of expert's notes; Review Goodsell motion to settle claim; Correspond with Matt Ball re the same	.80	312.00
11/17/22	MJB	(Hafen v. Goodsell) Finalize motion for approval of settlement agreement (0.3); Correspond with Shaun Peck (0.1)	.40	144.00
11/17/22	JLO	Discuss strategy for potential clawback claims against investors	.20	72.00
11/17/22	JAB	Review order denying motion to substitute party; Correspond with Jonathan Hafen re settlements; Review documents re third-party subpoena	1.50	510.00
11/17/22	CMM	Draft research summary re work product privilege for expert notes and interviews; Communicate with experts and Jeffery Balls re the same and upcoming third party production; Review documents from BRG for work product privilege; Attorney conference with Jeffery Balls re production and needed redactions; Correspond with the experts re redactions and confidential productions	6.90	1,587.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

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11/17/22	CY	Draft notice of withdrawal for Sarah Humphrey in Nichols, Olsen, Wheeler, Ellingford case; Draft notice of withdrawal for David Mooers-Putzer in Call case; Draft notice of withdrawal for Cynthia Love in Didonato, Haddock, Thurgood, Wheeler, Tea and Birge case	3.10	465.00
11/17/22	RGW	Research re inquiry notice standard and good faith under the fraudulent transfer act; Prepare memo re same; Communicate with Thomas Melton re complaint theories	6.50	2,925.00
11/17/22	TMM	Review documents re receivership and accounting; Conference with Robert Wing re same	5.50	2,475.00
11/17/22	JH	Prepare for attorney review BRG's subpoena documents; Update active lawsuit tracking with amended scheduling orders; Organize documents and draft a guide to RRC and ten specific claw back cases for Joni Ostler, Tom Melton, and Robert Wing	6.10	933.30
11/18/22	MTH	Conference with Claire McGuire re discovery in Larsen matter and general case issues	.50	185.00
11/18/22	JLO	Meet with Ray Strong, Jeff Shaw, Robert Wing, and Tom Melton re clawback calculations and evidence on various potential clawback claims; Review dockets; Edit Substitution of Counsel; Discuss applicable court rulings and burden of proof	2.60	936.00
11/18/22	JAB	Review notice of withdrawals for filing; Review status of litigation matters; Email Paul MacArther and Brian Langford re Wheeler clawback; Draft forms and default packet for Mary Anne Olsen; Telephone conference with Jeff Shaw; Correspond with Jon Hafen re settlements; Email Adam Millet re recordings	6.50	2,210.00
11/18/22	CMM	Draft redactions to Zions production from BRG; Review subsequent productions documents and interview notes sent by BRG; Attorney conference with Michael Hoppe re discovery issues and Gaylen Rust deposition; Draft discovery requests for beneficiary defendants; Draft discovery requests for beneficiary defendants	6.80	1,564.00
11/18/22	RGW	Meet with expert witness re claims analysis; Review Hafen v. Famulary and Hafen v. Brimley; Read documents re Mark Oberhansly	5.30	2,385.00
11/18/22	TMM	Review accounting and claims re investors; Draft complaint	8.80	3,960.00
11/18/22	JH	Check and respond to RRC team emails; Organize documents and draft a guide to RRC and ten specific claw back cases for Joni Ostler, Tom Melton, and Robert Wing; Redact documents for Claire McGuire; Search for documents for Jeff Balls re a claw back case	5.50	841.50
11/19/22	JMC	Correspond with Jared Scott re Thurgood settlement; Correspondence re division of clawback actions between Robert Wing, Tom Melton and Joni Ostler	.30	117.00
11/21/22	JMC	Review and revise settlement with clawback defendants; Correspond with Jeff Balls re the same; Correspond with Robert Wing and others re meeting; Correspond with Michael Hoppe re discovery issues involving Larsen	2.50	975.00
11/21/22	MTH	Review discovery schedule and correspond with counsel for Richard Larsen re discovery, depositions and case issues	.40	148.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
11/21/22	MTH	Review case filings and correspond with opposing counsel re discovery; Review correspondence from opposing counsel re case; Review and respond to correspondence from Joe Covey re case strategy; Review and respond to correspondence from opposing counsel re discovery; Conference with Claire McGuire re discovery strategy	.90	333.00
11/21/22	JLO	Discuss potential clawback claim against investor	.20	72.00
11/21/22	JAB	Conference with Robert Wing re clawback actions; Conference with Joseph Covey; Draft confession of judgment to resolve clawback action; Email John Swallow re settlement agreement; Draft and revise notice of settlement distribution plan	4.60	1,564.00
11/21/22	CMM	Correspond with Jeff Shaw re Quickbooks files for Zions production; Correspond with Zions counsel re deposition of Gaylen Rust and production of additional documents; Review quitclaim IP agreement and draft motion for approval of the same; Correspond with Jessica Houf re Pacer account and gathering documents for new claw back attorneys; Review settlement with Fields parties	3.60	828.00
11/21/22	CMM	Review and redact documents for production to Zions counsel from BRG; Review correspondence re extension in Larsen litigation; Attorney conference with Joseph Covey and Michael Hoppe re the same; Compile documents for supplemental production in various claw backs	4.40	1,012.00
11/21/22	CY	File notices of withdrawal for Sarah Humphrey in Nichols, Olsen, Wheeler, Ellingford case; File notices of withdrawal for David Mooers-Putzer and Cynthia Love in Call case; File notices of withdrawal for Cynthia Love in Didonato, Haddock, Thurgood, Wheeler, Tea and Birge case	1.50	225.00
11/21/22	RGW	Review documents re Mark Oberhansly claim and complaint; Communicate with expert witness re Oberhansly evidence; Review Oberhansly pleadings, including settlement agreement and dismissal of claim against Fern Oberhansly, et al; Begin draft complaint	6.20	2,790.00
11/21/22	TMM	Draft investors clawback complaint; Review clawback complaint; Review claim forms	5.30	2,385.00
11/21/22	SB	Email exchange with Jessica Houf re document collections and access by the team	.20	40.00
11/21/22	JH	Organize documents and draft a guide to RRC and ten specific claw back cases for Joni Ostler, Tom Melton, and Robert Wing; Update claw back tracking with new attorney assignments; Organize RRC claw back court opinions for Joni Ostler	6.00	918.00
11/22/22	JMC	Correspond with James Tracy and Michael Hoppe re discovery issues; Correspond with Jeff Balls re various clawback actions	1.50	585.00
11/22/22	MTH	Review and respond to correspondence from opposing counsel re discovery deadlines in Richard Larsen matter; Correspond with beneficiaries counsel re same	.30	111.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
11/22/22	JAB	Conference with Robert Wing; Coordinate production of documents to NVP; Telephone conference with Paul Scarlato; Telephone conference with Robert Wing, Tom Melton, Jeff Shaw, and Ray Strong; Review correspondence from Adam Millett; Email John Swallow re settlement	1.80	612.00
11/22/22	CMM	Attorney meeting with Michael Hoppe re discovery deadlines for Larsen; Communicate with opposing counsel re the same; Coordinate production to North Valley Partners in response to subpoena	.80	184.00
11/22/22	CMM	Review and redact new documents for initial disclosure supplement in claw back actions; Communicate with Zions counsel re documents produced in third party subpoena	5.60	1,288.00
11/22/22	CBB	Review Wells Group documents for confirmation of events and evidence re Igor Kovalenko claim (.7); Draft and revise claim stipulation for Ronald and Adam Wells to release their claim to money contributed by Igor (.8); Send stipulation to Jeff Balls with context and strategy (.2); Review request for update from Jessica Houf and Jeff Shaw (.1); Review case docket, outstanding claims, and record documents and provide update to Jessica and the litigation team in an email memo (.4)	2.20	594.00
11/22/22	CBB	Review and analyze Muir's first set of discovery requests	.30	81.00
11/22/22	RGW	Revise complaint; Communicate with co-counsel re Oberhansly claim and complaint; Telephone conference with expert witness re Oberhansly; Review Oberhansly records	5.50	2,475.00
11/22/22	TMM	Prepare clawback complaint; research issue re payments	7.60	3,420.00
11/22/22	JH	Check and respond to RRC related emails; Update and share with Jeff Balls documents re Mary Olsen's claw back; Organize and gather court opinions for Joni Ostler; Consult with Robert Wing re claw back cases; Meet with Jeff Shaw re amended scheduling orders and expert reports; Prepare large file transfer for Jeff Balls re an RRC subpoena request	7.00	1,071.00
11/23/22	RGW	Review documents produced by Mark Oberhansly in support of his claim;	2.00	900.00
11/23/22	TMM	Draft clawback complaint; Review investor complaint and accounting	3.40	1,530.00
11/23/22	JH	Prepare large file transfer for Jeff Balls re an RRC subpoena request; Organize review documents for Joni Ostler, Tom Melton, and Robert Wing; Update Joni Ostler, Tom Melton, and Robert Wing re their assigned claw back cases	4.00	612.00
11/25/22	JAB	Review expert report of Ray Strong; Review pleadings for summary judgment	3.90	1,326.00
11/28/22	JAB	Coordinate production of documents; Call and email John Flitton re Mary Ann Olsen matter; Analyze clawback action against Ron Wheeler	1.10	374.00
11/28/22	CMM	Research and draft complaint against investor having defaulted on settlement agreement; Research investor complaint re claim determinations	4.80	1,104.00
11/28/22	RGW	Read Gaylen Rust deposition; Read Josh Rust deposition	3.90	1,755.00
11/28/22	JH	Prepare and organize large file transfer for subpoena production for Jeff Balls; Manage settlement payment tracking	1.90	290.70

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
11/29/22	JMC	Correspond with Robert Wing, Tom Melton and others re various clawback actions and legal strategy; Review and analyze settlement terms; Correspond with Jeff Balls re clawback action	2.90	1,131.00
11/29/22	RMB	Review and analyze Troy Piantes proposed settlement options; Further analysis of additional claimed investments by Troy Piantes and review of investment related documents; Prepare settlement communication to Troy Piantes; Communicate with Robb Jones re Dolores Batalla refinance status and possible settlement options; Review Dolores Batalla claw-back file	3.30	1,254.00
11/29/22	JAB	Conference with Jeff Shaw, Ray Strong, Tom Melton, and Robert Wing re clawback action; Review documents re Wheeler; Conference with Tom Melton, Robert Wing, Joseph Covey, Claire McGuire, and Jesse Houf re litigation matters	6.40	2,176.00
11/29/22	CMM	Meet with Tom Melton, Robert Wing, Jeffery Balls and Joseph Covey re status of claw back actions; Draft terminations of tolling agreements for various claw back actions	4.60	1,058.00
11/29/22	CBB	Review email from David Mooers-Putzer re March 2022 case updates (.2); Send Jeff Balls follow up email re claim stipulation for Ron and Adam Wells re Igor Kovalenko (.1)	.30	81.00
11/29/22	RGW	Meeting with expert witnesses re Mark Oberhansly matter; Meeting with team members re litigation status; Review opinions in Klein v. Shepard and Wing v. Layton re inquiry notice standard; Telephone call with Mark Pugsley re Howard Hess and Mark Oberhansly matters	7.30	3,285.00
11/29/22	TMM	Meeting with accountants re Investor clawback issues; Continue to draft clawback complaint	8.20	3,690.00
11/29/22	JH	Research internal claw back communications responsive to Tom Melton and Robert Wing's cases; Arrange large file transfer for subpoena production; Manage and organize documents for claw back actions; Update settlement tracking with new payments; Gather documents for Jeff Balls and Chauncey Bird re Wheeler claw back; Meet with Joe Covey, Claire McGuire, Jeff Balls, Tom Melton, and Robert Wing re ongoing claw back actions	8.70	1,331.10
11/30/22	RMB	Evaluate proper default judgment amounts for Adrian Alvarez, Terry Jones, and Larry Milligan	1.40	532.00
11/30/22	JAB	Review correspondence re clawback actions	.30	102.00
11/30/22	CMM	Manage files for claims; Draft discovery requests for Larsen clawback; Attend to discovery issues for third party subpoenas	5.70	1,311.00
11/30/22	JH	Research and gather documents responsive to Hafen v. Percell discovery request; Update tracking and claw back files with attorney case updates; Manage claw back case documents for Claire McGuire and Tom Melton; Organize with IT the encryption of a hard drive for production	4.00	612.00
12/01/22	JMC	Correspond with Gary Longmore re Oberhansly amended tax return; Draft agreement related to work on clawback cases	.20	78.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

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12/01/22	MTH	Correspond with Claire McGuire re stipulation for discovery issues in Larsen matter	.10	37.00
12/01/22	JAB	Conference with Robert Wing re clawback actions	.20	68.00
12/01/22	CBB	Discuss discovery responses with Jessica Houf	.20	54.00
12/01/22	RGW	Revise Oberhansly draft complaint; Read Tenth Circuit Georgelas opinion; Review documents re Hess issue	3.40	1,530.00
12/01/22	JH	Manage and respond to emails re Rust Rare Coin claw back cases; Review and gather documents for Percell discovery request; Arrange delivery of production to opposing counsel; Gather documents for Tom Melton re Guyon claw back	4.60	703.80
12/02/22	JMC	Correspond with Jon Hafen, Robert Wing and others re work on clawback matters and related issues	1.10	429.00
12/02/22	MTH	Telephone conference with Claire McGuire re discovery issues in Larsen	.10	37.00
12/02/22	MTH	Review and responds to correspondence from Claire McGuire re stipulation and order to extend discovery deadlines	.10	37.00
12/02/22	MTH	Review and respond to correspondence from Claire McGuire re stipulation and discovery in Larsen matter	.10	37.00
12/02/22	JAB	Revise deposition notice for Jill Sagarin; Email Ryan Pahnke re same	.40	136.00
12/02/22	CMM	Attorney conference with Jessie Houf re needed supplemental disclosures for Larsen, Percell and Muir claw back actions; Review documents produced for subpoena and precedent re custody and control of documents originating from experts custody; Draft email to Jeffery Balls re the same	2.50	575.00
12/02/22	CMM	Draft motion to extend deadlines in Larsen clawback; Communicate with opposing counsel and Michael Hoppe re the same	1.60	368.00
12/02/22	CY	Draft motion for extension of deadlines (Larsen Case)	1.00	150.00
12/02/22	RGW	Analyze documents re Woodfin; Email with expert re Woodfin; revise Mark Oberhansly complaint; Email re Hess settlement	3.10	1,395.00
12/02/22	JH	Manage and respond to RRC team emails re claw back actions; Meet with Claire McGuire re supplemental production for Larsen claw back; Review active claw backs to determine additional supplemental productions; Manage and track payments received for the Receivership Estate; Gather and organize documents for Percell discovery request	3.00	459.00
12/05/22	MTH	Review stipulation and correspondence from Claire McGuire re motion in Larsen case; Telephone conference with Claire McGuire re stipulation and motion	.20	74.00
12/05/22	MTH	Review and respond to correspondence from James Tracy re Larsen's discovery responses	.10	37.00
12/05/22	JLO	Review Expert Report of D. Ray Strong; Review file re Ellingford clawback suit; Review tolling agreements and file re additional investor group clawbacks	2.70	972.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

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12/05/22	JAB	Review Wheeler documents; Review Sagarin matter; Email Ryan Pahnke re damages number; Conference with Claire McGuire re same; Email Jeff Shaw re valuation; Telephone conference with Jeff Shaw re same; Review correspondence re upcoming clawback actions	2.10	714.00
12/05/22	CMM	Attorney conference with Jeffery Balls re Sagarin claw back discovery issues; Review produced materials and BRG schedules for the same	.50	115.00
12/05/22	CMM	Revise stipulated motion and order extending discovery deadlines; Attorney conference with Michael Hoppe re the same; Prepare and file the same	3.10	713.00
12/05/22	CBB	Discuss discovery responses with Claire McGuire (.1); Draft and revise objections and responses to Muir's first set of discovery requests (4.2)	4.30	1,161.00
12/05/22	RGW	Revise Oberhansly complaint; read case law re good faith defense; correspondence with counsel for Hess re settlement	4.10	1,845.00
12/05/22	TMM	Review clawback complaint; telephone conference with Robert Wing re same	2.50	1,125.00
12/05/22	SB	Email exchange with Bob Reitz office re service in Neola, UT; Telephone call with Jessica Houf re document production preparations and service options; Review and forward the email from CD Baby to the team; Telephone call with Jessica Houf to review deadlines and procedures for handling same; Review documents and update review sets for the attorneys for the upcoming matters	3.50	700.00
12/05/22	JH	Research and tag documents in Eclipse for Mark Oberhansly claw back matter for Robert Wing; Investigate a process server for Oberhansly claw back; Update active lawsuit tracking spreadsheet and plan for upcoming due dates	4.40	673.20
12/06/22	JMC	Review inquiry notice facts in Oberhansly matter from Robert Wing	.30	117.00
12/06/22	MTH	Review scheduling order in Darren Nelson matter; Review and respond to correspondence from Jessica Houf re initial disclosures	.10	37.00
12/06/22	MTH	Review correspondence and proposed stipulated motion and order from opposing counsel in Larsen matter and respond to same	.20	74.00
12/06/22	MTH	Correspond with Joe Covey and Claire McGuire re stipulated motion and Gaylen Rust deposition in Larsen matter	.10	37.00
12/06/22	JLO	Review evidence re Ellingford lawsuit; Review prior communications with Clay Ellingford and internally; Email receiver re same; Review evidence re additional investor group claims	4.20	1,512.00
12/06/22	JAB	Review draft claw back complaint; Correspond with Robert Wing re same; Review correspondence re assignment of claims; Correspond with Joni Ostler re tithing issue	1.10	374.00
12/06/22	CMM	Review factual statements for claw back action complaint; Review email correspondence about option to for claimants to sell claim; Research agency law and application of inquiry notice	3.40	782.00
12/06/22	CBB	Draft and revise objections and responses to Muir's first set of discovery requests	.80	216.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

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12/06/22	RGW	Review Oberhansly tolling agreement; Revise Oberhansly complaint; Emails with opposing counsel and receiver re settlement; Communication re claim purchase issue	3.50	1,575.00
12/06/22	TMM	Prepare complaint	1.80	810.00
12/06/22	JH	Create calendar for expert disclosures and reports for Ray Strong and Jeff Shaw of BRG; Compose a case update re December claw back deadlines for Jeff Shaw at BRG; Update claw back attorneys re upcoming deadlines for December	2.50	382.50
12/07/22	MTH	Review information re Darren Nelson investment amounts and documentation and respond to correspondence from Jeff Shaw re queries (.3)	.30	111.00
12/07/22	MTH	Review correspondence from Jeffrey Shaw re Darren Nelson and compile information in response to queries	.30	111.00
12/07/22	MTH	Review revised scheduling order and dates from court re Larsen matter	.10	37.00
12/07/22	MTH	Review and respond to correspondence from Jeff Shaw re initial disclosures in Darren Nelson matter	.10	37.00
12/07/22	MJB	(Hafen v. Goodsell) Correspond with Jesse Houf (0.1); Telephone conference with Tonya Shields (0.1)	.20	72.00
12/07/22	JLO	Discuss strategy re clawback case against investor; Review evidence re clawback claims against investor group	.30	108.00
12/07/22	JAB	Review various correspondence	.10	34.00
12/07/22	CBB	Review discovery requests and draft and revise discovery responses in Muir (.9); Review status of Wells group matter and follow up with Jeff Balls re claim stipulation (.2)	1.10	297.00
12/07/22	RGW	Prepare Hess settlement agreement; Emails with receiver re same; Review Guyon complaint	3.20	1,440.00
12/07/22	TMM	Prepare clawback complaint; Review clawback complaint	2.50	1,125.00
12/08/22	JLO	Review evidence re clawback claims against investors	3.10	1,116.00
12/08/22	JAB	Correspond with Tom Melton re clawback; Review Sagarin documents; Telephone conference with Jeff Shaw re Sagarin	1.80	612.00
12/08/22	CMM	Review documents and correspondence relating to Peter Guyon claw back and included parties	.80	184.00
12/08/22	CMM	Review correspondence with Susie Bailey relating to Larsen database	.20	46.00
12/08/22	CBB	Discuss internally scope of discovery requests and responses and objections provided in other ancillary cases and documents produced in response to discovery requests, review discovery requests, and continue drafting and revising objections and responses to Muir's first set of discovery requests	5.90	1,593.00
12/08/22	RGW	Revise Oberhansly tolling agreement termination;	.80	360.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
12/08/22	SB	Modify the OPT and Dat files and update the Larsen database; Email exchange with the team re same; Review the RRC Initial Disclosure index and communicate with Jessica Houf re changes to same; Follow up re the Wells, Maisey, Nelson and Robert close of discovery; Review the redacted general initial disclosures and update the files for same; Review and redact personal information to prepare the same for production to pro se defendants	5.80	1,160.00
12/09/22	JLO	Review evidence re clawback claims against investors; Draft clawback letter to investor	4.00	1,440.00
12/09/22	JAB	Review Sagarin documents; Review metals values; Email Ryan Pahnke; Correspond with Tom Melton; Review discovery responses for clawback actions	3.10	1,054.00
12/09/22	CMM	Review correspondence with opposing counsel re support for numbers in Sagarin claw back case; Research inquiry notice issue in the case that an agent has notice; Review discovery responses for filing in Muir and Percell cases; Attorney conference with Chaunceton Bird re the same	2.80	644.00
12/09/22	CBB	Draft and revise responses and objections to Muir and Percell's first set of discovery responses and circulate and discuss drafts to and with litigation team	4.20	1,134.00
12/09/22	SB	Review the different collections of the redacted general initial disclosures and update the files for same; Review and redact personal information to prepare the same for production to pro se defendants; Assist with preparing our responses to interrogatories and additional document requests; Review emails re the NVP Production files; Communicate with Jessica Houf re same; Identify the BRG document production for NVP and note same; Prepare a share file for the vendor of the HAFENPROD006 production; Email to the vendor specifications for preparing a load file of same; Research re Flash 1 TV Inc. and Silver Spoon Delivery, Inc., and identify the status of each; Research the registered agent and member lists for same; Email exchange with Tom Melton re same	5.00	1,000.00
12/09/22	JH	Research for Joni Ostler and Tom Melton re RRC claw back cases; Locate and organize files for redacted expert reports for Hafen v. Nelson	6.50	994.50
12/12/22	RMB	Review Troy Piantes correspondence file; Communicate with Troy Piantes re settlement status and issues;	.30	114.00
12/12/22	JLO	Analyze evidence in support of potential clawback claims; Draft and send letter to investor re clawback claim	2.10	756.00
12/12/22	CMM	Attorney conference with Chaunceton Bird and Jeffery Balls re Wells group issues and claims stipulation in a strict payor scenario; Review correspondence with Chaunceton Bird and Jeff Shaw re the same; Review correspondence re settlement payment issues with Jessie Houf	1.60	368.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
12/12/22	CBB	Review email and attached motion and proposed order from opposing counsel re stipulation to take Gaylen Rust's deposition and check with Joe Covey re stipulation (.3); Review email from Jeff Shaw re request for update (.1); Review and respond to Susie Bailey re fact discovery supplementation in Wells group (.2); Discuss discovery responses and document productions in Muir and Percell with Jessica Houf (.3)	.90	243.00
12/12/22	RGW	Correspondence re Oberhansly termination of tolling agreement	.20	90.00
12/12/22	SB	Communications with Jessica Houf; Assist with the document review and collection of materials related to the Muir and Percell claw backs; Prepare the same for production; Review Daniel Zarkou and Cynthia Love's files and the Dropbox files to search for unredacted Expert Reports; Review and redact materials to assist with our production requests from pro se defendants	5.50	1,100.00
12/12/22	JH	Research email correspondence for Joni Ostler re RRC claw back cases; Prepare production for Hafen v. Muir and Hafen v. Percell for Chaunceton Bird	5.80	887.40
12/13/22	JAB	Prepare for Jill Sagarin deposition; Conference with Jeff Shaw re same; Telephone conference with Ryan Pahnke	6.80	2,312.00
12/13/22	CMM	Attorney conference with Robert Wing re inquiry notice issues for Larsen claw back	.60	138.00
12/13/22	CMM	Attorney conference with Robert Wing re imputed agency knowledge and case law to support such an inference	.50	115.00
12/13/22	CBB	Discuss discovery request production of documents in Muir and Percell with Claire McGuire, Jessica Houf, and Susie Bailey (1.4); Review collected documents ahead of production (.7); Review proposed order from opposing counsel re taking deposition of Gaylen Rust and approve signature (.2); Review update request from Jeff Shaw in Wells group and respond with request for additional info from Jeff Balls (.2)	2.50	675.00
12/13/22	RGW	Review plea agreements in connection with research re inquiry notice	1.20	540.00
12/13/22	SB	Review and redact materials to assist with our production requests from Pro Se defendants	5.60	1,120.00
12/13/22	JH	Prepare productions for two claw back cases for Chaunceton Bird; Consult with Claire McGuire and Chaunceton Bird re Percell and Muir Discovery Requests; Request documents from Jeff Shaw at BRG responsive to discovery requests; Compose update for Joni Ostler re Sargent 2 research request	8.60	1,315.80
12/14/22	JMC	Correspond with Susie Bailey re depositions and related issues	.30	117.00
12/14/22	MTH	Review and respond to correspondence from Jessica Houf re initial disclosures in Darren Nelson case; Review correspondence from Susie Bailey re initial disclosures; Telephone conference with Susie Bailey re initial disclosures; correspond with Claire McGuire re same; Review correspondence from opposing counsel's office in Larsen matter	.60	222.00
12/14/22	MJB	(Hafen v. Howell) Prepare for oral argument on MSJ (2.9)	2.90	1,044.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
12/14/22	JAB	Prepare for Jill Sagarin deposition; Take Jill Sagarin deposition; Conference with Jeff Shaw and Claire McGuire re same; Email court reporter re exhibits; Review Wells group claims; Email Chauncey Bird re same	6.40	2,176.00
12/14/22	CMM	Prepare for and attend deposition of Jill Sagarin; Attorney conference with Robert Wing re agency and inquiry notice research	3.60	828.00
12/14/22	CBB	Monitor email correspondence between paralegals and Salt Lake Legal in preparation for responding to discovery requests in Muir and Percell matters	.20	54.00
12/14/22	SB	Continue to review and redact private information from the General Initial Disclosures to prepare a production set for pro se defendants	6.00	1,200.00
12/14/22	JH	Locate and organize files for Pro se defendant initial disclosures; Redact initial disclosures for Hafen v. Nelson; Consult with Michael Hoppe and Claire McGuire re production for Pro se defendants	5.00	765.00
12/15/22	JMC	Review motion to depose Gaylen Rust in the Muir case; Correspond with Chauncey Bird re the same; Correspond with Matt Ball re summary judgment hearing	1.50	585.00
12/15/22	RMB	Review Dolores Batalla financial records and analyze collectability issues for settlement and summary judgment purposes; Communicate with Robb Jones re status of Dolores Batalla refinance; Review Troy Piantes correspondence and analyze collectability issues and sources of repayment for settlement and summary judgment purposes; Further review of Terri Andreini related investment activity and analysis of claim amount; Review Kennedy Barnes summary judgment papers and evaluate response and trial strategy	3.20	1,216.00
12/15/22	MTH	Review correspondence from Josh Lee re deposition of Gaylen Rust in Larsen matter and correspond with Claire McGuire and Joe Covey re same; Respond to correspondence from Josh Lee re deposition of Gaylen Rust	.20	74.00
12/15/22	MJB	Prepare for and attend oral argument on MSJ and motions to exclude (4.1)	4.10	1,476.00
12/15/22	JAB	Correspond with Chauncey Bird; Review documents from Ryan Pahnke; Review and analyze claims against Sagarin; Email Jeff Shaw re same	1.70	578.00
12/15/22	CMM	Attorney conference with Chaunceton Bird re strict payor payee analysis; Review resources sent by Robert Wing re inquiry notice	1.90	437.00
12/15/22	CBB	Review finalized drafts of Muir and Percell discovery responses and discuss revisions and finalizations with Jessica Houf (.4); Review and respond to strategy and case history information from Jeff Balls, especially with regard to Wells group, and discuss with Claire McGuire (.6); Review and respond to opposing counsel's email re scheduling and taking of Gaylen Rust's deposition (.2)	1.20	324.00
12/15/22	SB	Continue to review and redact private information from the General Initial Disclosures to prepare a production set for pro se defendants	6.00	1,200.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
12/15/22	JH	Edit and prepare discovery responses for Percell & Muir; Prepare, upload, and share discovery responses and productions with opposing counsel for Hafen v. Muir and Hafen v. Percell	6.50	994.50
12/16/22	RMB	Communicate with Robb Jones re Dolores Batalla settlement and refinance status; Prepare status report to Court re Dolores Batalla settlement status; Review financial records for Dolores Batalla	.80	304.00
12/16/22	MTH	Review correspondence from Susie Bailey re initial disclosures in Larsen matter; Telephone conference with Susie Bailey re initial disclosures	.30	111.00
12/16/22	JAB	Conference with Joseph Covey and Robert Wing re clawback action; Review pleadings and documents	1.30	442.00
12/16/22	RGW	Correspondence with former counsel for Oberhansly re tolling agreement; review documents re Oberhansly litigation	1.50	675.00
12/16/22	TMM	Revise investor clawback complaint	2.50	1,125.00
12/16/22	SB	Continue to review and redact private information from the General Initial Disclosures to prepare a production set for pro se defendants	5.20	1,040.00
12/19/22	RMB	Review Troy Piantes settlement communication and review settlement correspondence; Review Troy Piantes investment documentation	.80	304.00
12/19/22	MTH	Review and revise initial disclosures in Nelson case; Conference with Claire McGuire re initial disclosures; Correspond with Jeffrey Shaw re initial disclosures	.70	259.00
12/19/22	WOP	Review loan documents; Research amortization schedules; Calculate interest paid under loans	2.70	648.00
12/19/22	CMM	Research and review Darren Nelson production; Draft initial disclosures; Communicate with Susie Bailey and Jessie Houf re redactions and productions; Communicate with Michael Hoppe re protective order and edits to initial disclosures; Serve initial disclosures	4.80	1,104.00
12/19/22	SB	Review and redact personal and private information from the general initial disclosures; Copy a working set of same to the shared drive; Communications with Jessica Houf re same; Email to Michael Hoppe to follow up on our initial disclosure relate to the Darren Nelson matter	5.00	1,000.00
12/19/22	JH	Complete research for Joni Ostler re claw back correspondence; Organize files for claw back cases; Review initial disclosures for Hafen v. Nelson; Redact initial disclosures for Hafen v. Nelson	6.50	994.50
12/20/22	MTH	Review issues re Larsen deadlines	.10	37.00
12/20/22	JAB	Conference with Chauncey Bird and Claire McGuire; Review clawback actions; Conference with Robert Wing re clawback; Email Scott Lang re clawback status	2.30	782.00
12/20/22	WOP	Continue review and analysis of investor documents; Review emails from Rusts re same	2.20	528.00
12/20/22	CMM	Communicate with Jeffery Balls and Chaunceton Bird re Wells investment group claw back	.30	69.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
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Matter: 2

Date	Tkpr	Description	Hours	Amount
12/20/22	CBB	Meet with Jeff Balls and Claire McGuire and discuss claim stipulation in Wells group and discuss strategy in case generally (.4); Revise and finalize claim stipulation and send copy to Adam Wells and Ronald Wells for execution (.5)	.90	243.00
12/20/22	RGW	Email to opposing counsel re Hess settlement; emails with Mark Oberhansly to determine representation status;	.60	270.00
12/20/22	JH	Review, redact, and sanitize Hafen v. Nelson initial disclosures; Meet Robert Wing re Mark Oberhansly's request for documents; Review tags and saved searches in Eclipse responsive to Oberhansly's request and report findings to Robert Wing	5.50	841.50
12/21/22	RGW	Analyze Oberhansly issue re Zions	.50	225.00
12/21/22	JH	Review, redact, and sanitize initial disclosures for Hafen v. Nelson; Meet with Robert Wing re Mark Oberhansly claw back and upcoming deadlines	6.50	994.50
12/22/22	JAB	Review correspondence re death of claimant; Review clawback actions	.90	306.00
12/22/22	CMM	Attorney conference with claw back attorneys re production issues; Review objection key sent by Jeffery Balls for editing of claims matrix; Research agency issue as related to inquiry notice of an attorney for Larsen claw back matter; Review complaint for Darren Nelson matter	5.80	1,334.00
12/22/22	RGW	Review email from Baker and emails re response	.30	135.00
12/23/22	MTH	Review and respond to correspondence from James Tracy re discovery responses in Larsen matter	.10	37.00
12/23/22	JLO	Conference with Steve Christiansen re claims against investor and settlement discussions; Review prior communications re settlement discussions; email Steve Christiansen re prior settlement discussions	.80	288.00
12/26/22	JMC	Review various clawback actions and discovery	.20	78.00
12/27/22	RGW	Perform final review of Oberhansly complaint for filing; emails re same	1.20	540.00
12/28/22	JMC	Correspond with Robert Wing and Jeff Balls re ancillary proceedings and use of a magistrate judge	.30	117.00
12/28/22	JAB	Correspond with Robert Wing re magistrate judges; Review pleadings; Review claw back documents; Conference with Claire McGuire	1.20	408.00
12/28/22	RGW	Emails with Mr. Oberhansly re complaint and service	.40	180.00
12/29/22	JMC	Correspond with Matt Ball and Jeff Balls re various clawback actions	.20	78.00
12/29/22	MTH	Correspond with Claire McGuire re protective order in Darren Nelson matter	.10	37.00
12/29/22	MJB	(Hafen v. Goodsell) Correspond with Jon Hafen and Joe Covey (0.1)	.10	36.00
12/29/22	JAB	Conference with Jesse Houf re status of paralegal matters; Review documents from Jesse Houf	1.20	408.00
12/29/22	WOP	Continue analysis of investor payments; Research whether investments can be secured by financing statement	2.70	648.00
12/29/22	RGW	Emails re Oberhansly matter	.30	135.00

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
12/29/22	SB	Communications with Jessica Houf to review status updates; Review the task lists for Percell, Nelson and Sagrin; Troubleshoot and transfer Jessica Houf's files; Note changes and file locations information; Copy the RRC_ Percell Production 002 files; Unzip; Modify the OPT and Dat file paths; Load the files, link the images and the natives and add OCR; Create the Hafen v Nelson, Darren database; Download load file; Unzip folder; Modify the OPT and dat files; Load the files, link the natives and images and add OCR; Backup the databases; Review and redact personal and private information from the Redacted sets of the Hafen and RRC Productions to be produced to pro se defendants; Telephone call with Lori Stumpf re post-claim notations and email and web message boards; Update the claim folders with same	6.50	1,300.00
12/30/22	WOP	Continue review of loan payments	2.30	552.00
12/30/22	SB	Review the task list; Review and redact personal and private information from the Redacted sets of the Hafen and RRC General Initial Disclosure Productions to produced them to the pro se defendants	4.00	800.00

TOTAL PROFESSIONAL SERVICES **$ 282,982.70**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	390.00	34.50	13,455.00
Rodger M Burge	380.00	50.80	19,304.00
Michael T Hoppe	370.00	23.30	8,621.00
Matthew J Ball	360.00	31.60	11,376.00
Joni L Ostler	360.00	22.10	7,956.00
Jeffery A Balls	340.00	123.50	41,990.00
Briggs J Matheson	310.00	.80	248.00
Chaunceton B Bird	270.00	28.90	7,803.00
Walter O Peterson	240.00	32.10	7,704.00
Claire M McGuire	230.00	224.40	51,612.00
Thomas M Melton	450.00	53.60	24,120.00
Robert G Wing	450.00	66.80	30,060.00
Susan Bailey - Paralegal	200.00	117.60	23,520.00
Jessica Houf - Paralegal	153.00	222.90	34,103.70
Crista Yancey - Paralegal	150.00	7.40	1,110.00
TOTALS		**1,040.30**	**$ 282,982.70**

COSTS ADVANCED

Date	Description	Amount
10/11/22	PACER Electronic Court Records	3.00
10/21/22	PACER Electronic Court Records	4.00
10/25/22	PACER Electronic Court Records	3.60

PARR BROWN GEE & LOVELESS

Invoice: 921731
Rust Rare Coin Receivership
Asset Analysis & Recovery

January 15, 2023
Client: 176430
Matter: 2

Date	Description	Amount
11/14/22	PACER Electronic Court Records	1.90
11/15/22	PACER Electronic Court Records	1.00
11/17/22	Salt Lake Legal - NVP v. Zions Subpoena Documents	91.26
12/08/22	SimpleCertified Mail	5.97
12/09/22	Utah Interactive - registered principals and documents	13.00
12/12/22	SimpleCertified Mail	6.92
12/14/22	PACER Electronic Court Records	7.30
12/27/22	Utah District Court - complaint	402.00
12/29/22	SimpleCertified Mail	5.97

TOTAL COSTS ADVANCED **$ 545.92**

TOTAL THIS INVOICE **$ 283,528.62**

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

January 15, 2023

Invoice: 921731
Client: 176430
Matter: 2

REMITTANCE ADVICE

RE: Asset Analysis & Recovery

BALANCE DUE THIS INVOICE **$ 283,528.62**

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

EFT/ACH Pay Instructions
Routing #: 124001545
Account #: 912454114

E-Check

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

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

Please reference your invoice # 921731

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

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

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

January 15, 2023

Invoice: 921732
Client: 176430
Matter: 3

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Disposition of Assets

Professional Services	$ 6,160.00
Total Costs Advanced	$ .00
TOTAL THIS INVOICE	**$ 6,160.00**

Invoice: 921732
Rust Rare Coin Receivership
Disposition of Assets

January 15, 2023
Client: 176430
Matter: 3

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/04/22	JMC	Review and analyze Denise Rust settlement; Correspond with Wally Bugden re the same; Review sale of properties and allocations to judgment	3.00	1,170.00
10/04/22	MSA	Analyze legal issues re composer request; Correspondence with Joe Covey	.50	160.00
10/05/22	JMC	Correspond with Mike Anderson re Chance Thomas transfer of IP; Review and revise IP quitclaim agreement; Correspond with Wally Bugden re sale of Layton properties and credit to Denise Rust	2.70	1,053.00
10/13/22	WOP	Continue analysis of loan payments; Research Utah law re claims of secured interests on investment	4.30	1,032.00
10/14/22	WOP	Research average profits on silver eagles; Call with Gary Laramie re same; Analyze and review rollover agreements; Review loan payments	3.50	840.00
10/17/22	MSA	Multiple correspondence with attorney team re settlement with prior opposing party; Analyze legal issues re same	.30	96.00
10/18/22	MSA	Multiple correspondence with attorney team re potential settlement payment by prior opposing party; Analyze legal issues re same	.30	96.00
10/19/22	WOP	Review loan documents; Review emails from investor to Rusts re same; Correspond with Claire re precious metal agreements; Review the same	2.20	528.00
10/20/22	MSA	Multiple correspondence with attorney team re prior settlement of entertainment claims; Analyze legal issues re same	.30	96.00
10/24/22	WOP	Review communications between Rust and investor re inquiry notice	2.20	528.00
11/21/22	JMC	Review and analyze Change Thomas' settlement agreement; Correspond with Mike Anderson and Claire McGuire re the same	.70	273.00
11/21/22	MSA	Correspondence with Joe Covey re potential quitclaim agreement with Chance Thomas; Preliminary review and analysis of legal issues re same	.40	128.00
11/28/22	MSA	Multiple correspondence with Joe Covey re Chance Thomas quitclaim; Review draft agreement and analysis of legal issues re same; Draft summary re same	.50	160.00

TOTAL PROFESSIONAL SERVICES **$ 6,160.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	390.00	6.40	2,496.00
Michael S Anderson	320.00	2.30	736.00
Walter O Peterson	240.00	12.20	2,928.00
TOTALS		**20.90**	**$ 6,160.00**

PARR BROWN GEE & LOVELESS

Invoice: 921732
Rust Rare Coin Receivership
Disposition of Assets

January 15, 2023
Client: 176430
Matter: 3

TOTAL THIS INVOICE **$ 6,160.00**

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

January 15, 2023

Invoice: 921732
Client: 176430
Matter: 3

REMITTANCE ADVICE

RE: Disposition of Assets

BALANCE DUE THIS INVOICE **$ 6,160.00**

Please return this advice with payment to:

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

Wire Transfer Instructions

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

E-Check

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

EFT/ACH Pay Instructions
Routing #: 124001545
Account #: 912454114

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

Please reference your invoice # 921732

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

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

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

January 15, 2023

Invoice: 921734
Client: 176430
Matter: 5

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Claims Administration

Professional Services	$ 44,212.70
Total Costs Advanced	$ .00
TOTAL THIS INVOICE	**$ 44,212.70**

Invoice: 921734
Rust Rare Coin Receivership
Claims Administration

January 15, 2023
Client: 176430
Matter: 5

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/03/22	JAB	Review vendor and employee claims	6.20	2,108.00
10/03/22	CMM	Call with Jeffery Balls re approvals for employee claims	.20	46.00
10/03/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.40	61.20
10/04/22	JAB	Review and revise claims registry for employees and vendors; Telephone conference with Jeff Shaw	3.10	1,054.00
10/04/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.60	91.80
10/05/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.20	30.60
10/06/22	JMC	Correspond with Jeff Balls re various proofs of claim and treatment	.50	195.00
10/06/22	JAB	Review claims registry for vendor and employee claims; Conference with Joseph Covey	1.00	340.00
10/06/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.50	76.50
10/07/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.50	76.50
10/10/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.20	30.60
10/11/22	JAB	Review and analyze claims for claims registry	1.00	340.00
10/11/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.20	30.60
10/12/22	JMC	Correspond with Jeff Balls re payment of property taxes on sold Rust properties; Review settlement statements re the same	1.10	429.00
10/12/22	JAB	Review and analyze claims for claims registry	3.00	1,020.00
10/12/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.60	91.80
10/13/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.20	30.60
10/14/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.20	30.60
10/17/22	JAB	Review and analyze claims for claims registry	3.10	1,054.00
10/17/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.20	30.60
10/18/22	JAB	Review and analyze claims for claims registry; Telephone conference with Jeff Shaw	5.50	1,870.00
10/18/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.10	15.30
10/19/22	JAB	Review and analyze claims for claims registry; Correspond with Wayne Klein re conflict claim; Telephone conference with Mark Pugsley	4.10	1,394.00
10/19/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.10	15.30
10/20/22	JMC	Correspond with Jeff Balls re claim and objection issues for various claims	.60	234.00
10/20/22	JAB	Correspond with Wayne Klein re conflict claims; Telephone conference with Jeff Shaw; Review and analyze claims for claims registry	.80	272.00
10/20/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.70	107.10
10/24/22	JAB	Review and analyze claims for claims registry	5.30	1,802.00
10/24/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.10	15.30
10/25/22	JAB	Review and analyze claims registry; Review correspondence from Wayne Klein re conflict claims	3.10	1,054.00

Invoice: 921734
Rust Rare Coin Receivership
Claims Administration

January 15, 2023
Client: 176430
Matter: 5

Date	Tkpr	Description	Hours	Amount
10/25/22	CMM	Prepare for and attend claims approval meeting with Jonathan Hafen and Jeffery Balls; Follow up re issues re to horse claims and insolvency statute	4.60	1,058.00
10/25/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.10	15.30
10/26/22	JAB	Review and analyze claims for claims registry	5.70	1,938.00
10/26/22	PJB	Attorney conference with Claire McGuire re withholding tax issue; Research re same	.50	140.00
10/26/22	CMM	Prepare for and attend claims analysis and recovery meeting with Jonathan Hafen and Jeffery Balls	4.90	1,127.00
10/26/22	JH	Respond to and manage claimant emails, calls, and website inquiries	1.50	229.50
10/27/22	JMC	Correspond with Lori Stumpf re treatment and notice to various claimants	.40	156.00
10/27/22	JAB	Review and analyze claims for claims registry	2.20	748.00
10/27/22	CMM	Prepare for and attend claims approval and analysis meeting with Jonathan Hafen and Jeffery Balls; Meet with Paul Barrus re tax issue with paying out employee claims	7.20	1,656.00
10/27/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.10	15.30
10/28/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.10	15.30
10/31/22	JMC	Correspond with Jeff Balls re claims distribution issues involving Zions settlement	1.10	429.00
10/31/22	JAB	Review and analyze claims for claims registry	.80	272.00
10/31/22	CMM	Review claims for approval in preparation for Jonathan Hafen meeting	2.80	644.00
11/01/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.10	15.30
11/02/22	JMC	Correspond with Lori Stumpf re inquiry about claim	.20	78.00
11/02/22	JAB	Review and analyze claims for claims registry	1.90	646.00
11/02/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.10	15.30
11/03/22	JMC	Correspond with Jeff Balls re clams information	.50	195.00
11/03/22	JAB	Review and analyze claims for claims registry	3.10	1,054.00
11/03/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.10	15.30
11/04/22	JMC	Correspond with Jeff Balls re claims issues; Review and analyze numerous claims	4.20	1,638.00
11/04/22	JAB	Review and analyze claims for claims registry; Conference with Joseph Covey re claims registry and administrative claims	6.00	2,040.00
11/04/22	PJB	Correspondence with Jeff Balls and Claire McGuire re employment taxes; Research re same	1.80	504.00
11/04/22	JH	Respond to and manage claimant emails, calls, and website inquiries	.10	15.30
11/07/22	JAB	Revise claims registry	3.40	1,156.00
11/07/22	JH	Respond to and manage claimant emails, calls, and website inquiries; Review motion for claims registry to create response tracking spreadsheet	2.50	382.50

Invoice: 921734
Rust Rare Coin Receivership
Claims Administration

January 15, 2023
Client: 176430
Matter: 5

Date	Tkpr	Description	Hours	Amount
11/08/22	JH	Respond to and manage claimant emails, calls, and website inquiries; Create claims registry response tracking spreadsheet	2.40	367.20
11/09/22	JMC	Review and revise motion and notice for Zions litigation and Receiver's claims distribution agent; Review docket for prior filings; Correspond with Jeff Balls re the same	3.20	1,248.00
11/09/22	JH	Manage and respond to emails and website inquiries for claimants; Create a spreadsheet for tracking claimant responses to the claims registry; Draft claims registry FAQs document	3.30	504.90
11/10/22	JMC	Review and revise class motion and notice; Correspond with Jeff Balls, class counsel and counsel for Zions re the same	3.00	1,170.00
11/10/22	JH	Manage and respond to emails and website inquiries for claimants; Draft claims registry FAQs document	1.20	183.60
11/11/22	JAB	Review and analyze claims for claims registry	3.30	1,122.00
11/11/22	JH	Respond to and manage claimant emails and inquiries; Manage claims documents	.20	30.60
11/14/22	JH	Manage and respond to emails and website inquiries for claimants	.30	45.90
11/15/22	JMC	Correspond with Jon Hafen, Jeff Balls and Claire McGuire re scam emails to claimants; Draft notice re the same; Correspond with Jeff Balls re claims process	2.00	780.00
11/16/22	JAB	Review and revise claims registry	.90	306.00
11/19/22	JMC	Correspond with Lori Stumpf re claimant requests	.10	39.00
11/21/22	JAB	Review and revise claims registry; Conference with Robert Wing re same	1.10	374.00
11/29/22	JAB	Review and revise claims registry; Conference with Jeff Shaw; Conference with Joseph Covey	.60	204.00
11/29/22	CMM	Research claim for issues and discrepancies in analysis; Attorney conference with Jeffery Balls re schedule for claims registry publication and claw back actions for reassignment; Review claw back notes from former attorney	2.80	644.00
11/30/22	JMC	Correspond with Claire McGuire re various claim issues	.40	156.00
11/30/22	JAB	Review and revise claims registry	.40	136.00
12/02/22	JAB	Telephone conference with Jeff Shaw re clawbacks	.40	136.00
12/05/22	JMC	Correspond with Jeff Balls re claims issues	.10	39.00
12/05/22	JAB	Telephone conference with Jeff Shaw re claims registry questions	.30	102.00
12/06/22	JMC	Correspond with Robert Wing, Tom Melton, Jon Hafen and others re claim transfers and related items	.70	273.00
12/08/22	JAB	Telephone conference with Jeff Shaw re claims registry	.20	68.00
12/09/22	JAB	Telephone conference with Jeff Shaw; Review claims for claims registry	.50	170.00
12/12/22	JAB	Telephone conference with Jeff Shaw re claims registry; Conference with Claire McGuire; Review and revise claims registry	1.20	408.00
12/12/22	CMM	Attorney conference with Jeffery Balls re claims guidance and Baker claim	.50	115.00

Invoice: 921734
Rust Rare Coin Receivership
Claims Administration

January 15, 2023
Client: 176430
Matter: 5

Date	Tkpr	Description	Hours	Amount
12/13/22	JAB	Review and revise claims registry	1.10	374.00
12/16/22	JMC	Correspond with Jeff Balls and Robert Wing re claim settlement issue	.30	117.00
12/16/22	JAB	Review and revise claims registry descriptions	1.30	442.00
12/19/22	JAB	Review and revise claims registry	3.00	1,020.00
12/20/22	JAB	Review and revise claims registry	.70	238.00
12/21/22	JAB	Review and revise claims registry	.80	272.00
12/23/22	JAB	Review and revise claims registry	.70	238.00
12/26/22	JMC	Coordinate with Jeff Balls re claims and related issues	.50	195.00
12/27/22	JAB	Review and revise claims registry	5.20	1,768.00
12/29/22	JAB	Review and revise claims registry	1.00	340.00
12/30/22	JAB	Review and revise claims registry	1.30	442.00

TOTAL PROFESSIONAL SERVICES **$ 44,212.70**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	390.00	18.90	7,371.00
Jeffery A Balls	340.00	83.30	28,322.00
Paul J Barrus	280.00	2.30	644.00
Claire M McGuire	230.00	23.00	5,290.00
Jessica Houf - Paralegal	153.00	16.90	2,585.70
TOTALS		**144.40**	**$ 44,212.70**

TOTAL THIS INVOICE **$ 44,212.70**

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

January 15, 2023

Invoice: 921734
Client: 176430
Matter: 5

REMITTANCE ADVICE

RE: Claims Administration

BALANCE DUE THIS INVOICE **$ 44,212.70**

Please return this advice with payment to:

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

Wire Transfer Instructions

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

E-Check

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

EFT/ACH Pay Instructions
Routing #: 124001545
Account #: 912454114

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

Please reference your invoice # 921734

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

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

EXHIBIT C

EXHIBIT C
SEVENTEENTH FEE APPLICATION
BRG's Fees & Expenses

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

February 6, 2023
Client-Matter: 16222-25457
Invoice #: 147100
Tax ID # 27-1451273

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

Services Rendered From October 1, 2022 Through December 31, 2022

Professional Services	$ 101,571.50	USD
Voluntary Reduction	(1,292.00)	
Expenses Incurred	59.59	
CURRENT CHARGES	**$ 100,339.09**	**USD**

PAYMENT IS DUE BY March 8, 2023

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: 147100

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.

Invoice # 147100
Client-Matter: 16222-025457

Services Rendered From October 1, 2022 Through December 31, 2022

PROFESSIONAL SERVICES

	Rate	Hours	Amount
Managing Director			
Ray Strong	390.00	18.60	7,254.00
Senior Managing Consultant			
Jeffrey Shaw	340.00	271.70	92,378.00
Jeffrey Shaw	0.00	3.80	N/C
Consultant			
Christina Tergevorkian	245.00	0.70	171.50
Senior Associate			
Jason Strong	300.00	1.30	390.00
Shelby Chaffos	215.00	0.40	86.00
Total Professional Services		**296.50**	**100,279.50**

EXPENSES

Computer Software	34.99
Data Research	11.68
Supplies	12.92
Total Expenses	**59.59**

BRG INVOICE

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

Invoice # 147100
Client-Matter: 16222-025457

SUMMARY BY TASK CODE

Task Code	Description	Hours	Amount
300	Claims Process / Distribution	54.80	18,632.00
350	Net Winner / Claims Analysis	109.90	37,861.00
500	Recovery Litigation	93.80	31,915.50
720	Document Subpoena Requests	34.20	11,871.00
950	Fee Application Preparation & Hearing	3.80	0.00
Total Professional Services		**296.50**	**100,279.50**

BRG INVOICE

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

Invoice # 147100
Client-Matter: 16222-025457

Services Rendered From October 1, 2022 Through December 31, 2022

DETAIL OF PROFESSIONAL SERVICES

Date	Name	Description	Hours	Rate	Amount
Task Code: 300 - Claims Process / Distribution					
10/10/22	Jeffrey Shaw	Analyzed investor summaries to identify potential claims not accounted for in claims register.	5.20	340.00	1,768.00
10/19/22	Jeffrey Shaw	Analyzed investor summaries to identify potential claims not accounted for in claims register.	1.30	340.00	442.00
10/20/22	Jeffrey Shaw	Analyzed investor summaries to identify potential claims not accounted for in claims register.	5.50	340.00	1,870.00
10/31/22	Jeffrey Shaw	Analyzed investor summaries to identify potential claims not accounted for in the claims register.	5.10	340.00	1,734.00
11/01/22	Jeffrey Shaw	Analyzed investor summaries to identify potential claims not accounted for in the claims register.	4.50	340.00	1,530.00
11/08/22	Jeffrey Shaw	Analyzed investor summaries to identify potential claims not accounted for in the claims register.	3.50	340.00	1,190.00
11/09/22	Jeffrey Shaw	Analyzed investor summaries to identify potential claims not accounted for in the claims register.	4.70	340.00	1,598.00
11/10/22	Jeffrey Shaw	Analyzed investor summaries to identify potential claims not accounted for in the claims register.	4.50	340.00	1,530.00
11/11/22	Jeffrey Shaw	Analyzed investor summaries to identify potential claims not accounted for in the claims register.	4.90	340.00	1,666.00
11/17/22	Jeffrey Shaw	Analyzed investor summaries to identify potential claims not accounted for in the claims register.	4.30	340.00	1,462.00
11/22/22	Jeffrey Shaw	Analyzed investor summaries to identify potential claims not accounted for in the claims register.	2.10	340.00	714.00
11/23/22	Jeffrey Shaw	Analyzed investor summaries to identify potential claims not accounted for in the claims register.	7.10	340.00	2,414.00

BRG INVOICE

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

Invoice # 147100
Client-Matter: 16222-025457

Date	Name	Description	Hours	Rate	Amount
11/29/22	Jeffrey Shaw	Analyzed investor summaries to identify potential claims not accounted for in the claims register.	2.10	340.00	714.00
		Total for Task Code 300	**54.80**		**18,632.00**
Task Code: 350 - Net Winner / Claims Analysis					
10/04/22	Jeffrey Shaw	Discussion with counsel regarding claims issues.	0.70	340.00	238.00
10/10/22	Jeffrey Shaw	Analyzed and reconciled investor claims.	2.10	340.00	714.00
10/11/22	Jeffrey Shaw	Analyzed activity, support and data and reconciled [redacted] group claims.	3.40	340.00	1,156.00
10/12/22	Jeffrey Shaw	Analyzed and reconciled [redacted] group claims.	4.50	340.00	1,530.00
10/13/22	Jeffrey Shaw	Analyzed and reconciled [redacted] group claims.	0.20	340.00	68.00
10/14/22	Jeffrey Shaw	Analyzed and reconciled [redacted] group claims.	2.30	340.00	782.00
10/17/22	Jeffrey Shaw	Analyzed and reconciled [redacted] group claims.	1.90	340.00	646.00
10/18/22	Jeffrey Shaw	Analyzed and reconciled [redacted] group claims.	4.90	340.00	1,666.00
10/18/22	Jeffrey Shaw	Met with counsel to discuss claims issues.	1.80	340.00	612.00
10/19/22	Jeffrey Shaw	Reviewed and updated claims register.	1.50	340.00	510.00
10/20/22	Jeffrey Shaw	Analyzed [redacted] claim per inquiry from counsel.	1.20	340.00	408.00
10/20/22	Jeffrey Shaw	Discussion with counsel regarding claim issues.	0.30	340.00	102.00
10/27/22	Jeffrey Shaw	Analyzed investment activity for [redacted] per counsel inquiry.	1.80	340.00	612.00
10/27/22	Jeffrey Shaw	Analyzed [redacted] investment activity per counsel inquiry.	1.20	340.00	408.00
10/27/22	Jeffrey Shaw	Discussion with counsel regarding claims issues.	0.70	340.00	238.00
11/07/22	Jeffrey Shaw	Follow-up with counsel regarding net winner issues.	0.30	340.00	102.00
11/08/22	Jeffrey Shaw	Call with counsel regarding claims issues.	0.40	340.00	136.00

BRG INVOICE

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

Invoice # 147100
Client-Matter: 16222-025457

Date	Name	Description	Hours	Rate	Amount
11/18/22	Jeffrey Shaw	Prepared for meeting with counsel regarding net winner issues.	0.30	340.00	102.00
11/18/22	Jeffrey Shaw	Attended meeting with counsel regarding status of various investor groups.	1.70	340.00	578.00
11/18/22	Jeffrey Shaw	Reviewed and prepared net winner analyses per counsel request.	1.00	340.00	340.00
11/18/22	Jeffrey Shaw	Call with counsel regarding various claim and net winner issues.	0.70	340.00	238.00
11/18/22	Ray Strong	Attended meeting with Counsel regarding clawback actions.	1.70	390.00	663.00
11/21/22	Jeffrey Shaw	Reviewed [redacted] files and analysis.	1.00	340.00	340.00
11/21/22	Jeffrey Shaw	Coordinated call regarding [redacted] activity.	0.30	340.00	102.00
11/22/22	Jeffrey Shaw	Reviewed [redacted] files and analysis.	0.50	340.00	170.00
11/22/22	Jeffrey Shaw	Discussion regarding [redacted] analysis.	0.50	340.00	170.00
11/22/22	Jeffrey Shaw	Reviewed and updated claw back settlements.	0.90	340.00	306.00
11/22/22	Jeffrey Shaw	Met with counsel to discuss [redacted] investment activity.	0.60	340.00	204.00
11/22/22	Jeffrey Shaw	Discussion with counsel regarding net winner issues.	0.30	340.00	102.00
11/22/22	Ray Strong	Reviewed [redacted] transactions in preparation for meeting with counsel.	0.50	390.00	195.00
11/28/22	Jeffrey Shaw	Analyzed [redacted] activity and support.	5.30	340.00	1,802.00
11/28/22	Jeffrey Shaw	Met with BRG to review [redacted] investment activity.	2.10	340.00	714.00
11/28/22	Ray Strong	Met with BRG (JS) regarding [redacted] transactions in preparation for meeting with counsel.	2.10	390.00	819.00
11/28/22	Ray Strong	Analyzed [redacted] documentation in preparation for meeting with counsel.	2.30	390.00	897.00

BRG INVOICE

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

Invoice # 147100
Client-Matter: 16222-025457

Date	Name	Description	Hours	Rate	Amount
11/29/22	Jeffrey Shaw	Reviewed Wheeler investment activity and responded to counsel inquiry.	0.90	340.00	306.00
11/29/22	Jeffrey Shaw	Met with counsel regarding [redacted] activity.	3.30	340.00	1,122.00
11/29/22	Jeffrey Shaw	Prepared for meeting with counsel on [redacted].	0.50	340.00	170.00
11/29/22	Ray Strong	Met with counsel to discuss [redacted] transactions for claim/clawback analysis.	3.30	390.00	1,287.00
11/30/22	Jeffrey Shaw	Analyzed various group claims.	1.70	340.00	578.00
11/30/22	Jeffrey Shaw	Reviewed and responded to counsel request regarding [redacted] group.	0.30	340.00	102.00
12/01/22	Jeffrey Shaw	Analyzed [redacted] group claims.	4.10	340.00	1,394.00
12/01/22	Jeffrey Shaw	Review and emails regarding [redacted] statements.	0.50	340.00	170.00
12/02/22	Jeffrey Shaw	Call with counsel regarding [redacted] group.	0.30	340.00	102.00
12/02/22	Jeffrey Shaw	Analyzed and reconciled [redacted] group claims.	2.50	340.00	850.00
12/05/22	Jeffrey Shaw	Analyzed and reconciled [redacted] group claims.	6.00	340.00	2,040.00
12/06/22	Jeffrey Shaw	Analyzed and reconciled [redacted] group claims.	3.50	340.00	1,190.00
12/08/22	Jeffrey Shaw	Reviewed email from counsel regarding [redacted] group.	0.30	340.00	102.00
12/08/22	Jeffrey Shaw	Analyzed and reconciled [redacted] group claims.	1.50	340.00	510.00
12/09/22	Jeffrey Shaw	Analyzed and reconciled [redacted] group claims.	6.00	340.00	2,040.00
12/09/22	Jeffrey Shaw	Discussions with counsel regarding [redacted] claims.	0.40	340.00	136.00
12/12/22	Jeffrey Shaw	Follow-up regarding [redacted] claims.	0.10	340.00	34.00
12/12/22	Jeffrey Shaw	Discussion with counsel regarding [redacted] claims.	0.50	340.00	170.00
12/12/22	Jeffrey Shaw	Analyzed and reconciled [redacted] group claims.	4.50	340.00	1,530.00
12/15/22	Jeffrey Shaw	Analyzed and reconciled [redacted] group claims.	4.10	340.00	1,394.00

BRG INVOICE

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

Invoice # 147100
Client-Matter: 16222-025457

Date	Name	Description	Hours	Rate	Amount
12/16/22	Jeffrey Shaw	Analyzed and reconciled [redacted] group claims.	2.60	340.00	884.00
12/16/22	Jeffrey Shaw	Analyzed and reconciled [redacted] claim.	1.30	340.00	442.00
12/19/22	Jeffrey Shaw	Analyzed and reconciled [redacted] claim.	4.20	340.00	1,428.00
12/22/22	Jeffrey Shaw	Analyzed and reconciled [redacted] group claims.	6.50	340.00	2,210.00
		Total for Task Code 350	**109.90**		**37,861.00**
Task Code: 500 - Recovery Litigation					
10/03/22	Jeffrey Shaw	Analyzed and prepared case files and documents in connection with Larsen discovery request.	7.00	340.00	2,380.00
10/03/22	Jeffrey Shaw	Discussion with counsel regarding Larsen discovery request.	0.10	340.00	34.00
10/04/22	Jeffrey Shaw	Reviewed and prepared Larsen files in connection with discovery request.	3.50	340.00	1,190.00
10/04/22	Jeffrey Shaw	Responded to counsel email regarding discovery.	0.20	340.00	68.00
10/05/22	Shelby Chaffos	Prepared download of Larsen document production for counsel.	0.40	215.00	86.00
10/05/22	Jeffrey Shaw	Larsen discovery issues.	5.20	340.00	1,768.00
10/05/22	Jeffrey Shaw	Prepared Larsen discovery write up.	1.00	340.00	340.00
10/05/22	Christina Tergevorkian	Examined Larsen investor group discovery documents.	0.70	245.00	171.50
10/07/22	Jeffrey Shaw	Reviewed investor activity and files in connection with counsel inquiry.	1.50	340.00	510.00
10/07/22	Jeffrey Shaw	Reviewed case files and responded to counsel inquiries regarding litigation matters.	1.00	340.00	340.00
10/07/22	Jeffrey Shaw	Resolved Eclipse issues.	0.50	340.00	170.00
10/07/22	Jeffrey Shaw	Reviewed emails in Eclipse in connection with Larsen litigation.	0.40	340.00	136.00
10/07/22	Jeffrey Shaw	Follow-up regarding Larsen production.	0.30	340.00	102.00
10/07/22	Jeffrey Shaw	Reviewed, finalized and submitted Larsen metals schedule to counsel.	1.20	340.00	408.00

BRG INVOICE

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

Invoice # 147100
Client-Matter: 16222-025457

Date	Name	Description	Hours	Rate	Amount
10/11/22	Ray Strong	Follow up on outstanding claw back actions with counsel.	0.70	390.00	273.00
10/14/22	Jeffrey Shaw	Responded to counsel inquiry/request regarding Sagamarte group.	0.30	340.00	102.00
10/14/22	Ray Strong	Reviewed status reports filed by Receiver in connection with clawback litigations.	0.50	390.00	195.00
10/17/22	Ray Strong	Follow up on Ponzi expert reports due in various claw-back actions.	0.50	390.00	195.00
10/19/22	Jeffrey Shaw	Analyzed Sagamarte group investment activity and documents.	4.10	340.00	1,394.00
10/25/22	Jeffrey Shaw	Reviewed and resolved QuickBooks file issues.	3.00	340.00	1,020.00
10/25/22	Jeffrey Shaw	Analyzed investment activity and support for Dolores Batalla in connection with litigation.	2.40	340.00	816.00
10/25/22	Jeffrey Shaw	Prepared declaration in connection with Dolores Batalla litigation.	1.60	340.00	544.00
10/26/22	Jeffrey Shaw	Prepared declaration in connection with Dolores Batalla litigation.	5.00	340.00	1,700.00
10/26/22	Jeffrey Shaw	Prepared exhibits to Dolores Batalla declaration.	2.30	340.00	782.00
10/27/22	Jeffrey Shaw	Prepared exhibits to Dolores Batalla declaration.	2.10	340.00	714.00
10/28/22	Jeffrey Shaw	Prepared exhibits to Dolores Batalla declaration.	4.90	340.00	1,666.00
10/28/22	Jeffrey Shaw	Email regarding Batalla Summary Judgment motion.	0.30	340.00	102.00
10/31/22	Jeffrey Shaw	Followed up regarding litigation issues.	0.30	340.00	102.00
10/31/22	Jeffrey Shaw	Discussion with counsel regarding litigation issues.	0.30	340.00	102.00
11/01/22	Jeffrey Shaw	Emails regarding litigation issues.	0.40	340.00	136.00
11/09/22	Jeffrey Shaw	Follow up regarding litigation issues.	0.20	340.00	68.00
11/17/22	Jeffrey Shaw	Reviewed QB file issues and emails regarding the same.	0.90	340.00	306.00
11/18/22	Jeffrey Shaw	Emails regarding litigation status and issues.	0.30	340.00	102.00

BRG INVOICE

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

Invoice # 147100
Client-Matter: 16222-025457

Date	Name	Description	Hours	Rate	Amount
11/18/22	Jeffrey Shaw	Reviewed status of various claw back and litigation matters.	2.50	340.00	850.00
11/18/22	Ray Strong	Reviewed investor files in preparation for meeting with Counsel regarding clawbacks.	1.10	390.00	429.00
11/21/22	Jeffrey Shaw	Reviewed and resolved QB file issues.	3.80	340.00	1,292.00
11/21/22	Jeffrey Shaw	Emails and discussions regarding QB file issues.	0.70	340.00	238.00
11/22/22	Jeffrey Shaw	Reviewed status and issues of various litigation matters.	0.90	340.00	306.00
12/02/22	Jeffrey Shaw	Reviewed and responded to inquiry from counsel regarding Woodfin group.	0.40	340.00	136.00
12/05/22	Jeffrey Shaw	Discussion with counsel regarding Sagarin litigation and other issues.	0.70	340.00	238.00
12/07/22	Jeffrey Shaw	Reviewed D Nelson investment activity and prepared initial disclosure documents per counsel request.	7.10	340.00	2,414.00
12/08/22	Jeffrey Shaw	Reviewed D Nelson investment activity and prepared initial disclosure documents.	5.20	340.00	1,768.00
12/08/22	Jeffrey Shaw	Prepared and submitted D Nelson initial discovery documents.	1.00	340.00	340.00
12/13/22	Jeffrey Shaw	Reviewed Sagarin investment activity to prepare for deposition.	3.30	340.00	1,122.00
12/13/22	Jeffrey Shaw	Discussion with counsel regarding Sagarin activity.	1.40	340.00	476.00
12/13/22	Jeffrey Shaw	Reviewed documents produced by Sagarin.	0.70	340.00	238.00
12/13/22	Jeffrey Shaw	Discussion with counsel regarding discovery issues.	0.20	340.00	68.00
12/13/22	Jeffrey Shaw	Reviewed and prepared detail transaction schedules for Percell litigation per counsel request.	1.10	340.00	374.00
12/13/22	Jeffrey Shaw	Reviewed and prepared detail transaction schedules for Muir litigation per counsel request.	1.10	340.00	374.00
12/14/22	Jeffrey Shaw	Prepared for and attended Sagarin deposition.	5.10	340.00	1,734.00

BRG INVOICE

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

Invoice # 147100
Client-Matter: 16222-025457

Date	Name	Description	Hours	Rate	Amount
12/14/22	Jeffrey Shaw	Reviewed investor activity and support and prepared Sagarin investment schedule.	2.10	340.00	714.00
12/15/22	Jeffrey Shaw	Reviewed Sagarin support and documents.	0.80	340.00	272.00
12/20/22	Jeffrey Shaw	Reviewed and responded to counsel inquiry regarding initial disclosure issues.	0.80	340.00	272.00
12/21/22	Jeffrey Shaw	Reviewed and discussed initial disclosure issues.	0.70	340.00	238.00
		Total for Task Code 500	**93.80**		**31,915.50**
Task Code: 720 - Document Subpoena Requests					
09/15/22	Jason Strong	Setup server and workstation to access POS system and backed up SQL database in connection with subpoena.	1.30	300.00	390.00
10/04/22	Ray Strong	Evaluated POS system data for production/discovery issues.	2.30	390.00	897.00
10/25/22	Jeffrey Shaw	Responded to emails regarding QuickBooks files produced in discovery.	0.50	340.00	170.00
10/27/22	Jeffrey Shaw	Emails and discussion regarding QuickBooks production.	0.60	340.00	204.00
10/28/22	Jeffrey Shaw	Prepared response to email regarding QuickBooks files.	0.30	340.00	102.00
10/28/22	Jeffrey Shaw	Analyzed QuickBooks files produced in discovery.	1.50	340.00	510.00
10/31/22	Jeffrey Shaw	Reviewed, emails and discussions regarding document subpoena.	0.50	340.00	170.00
11/02/22	Jeffrey Shaw	Analyzed files and documents to be produced pursuant to subpoena.	2.30	340.00	782.00
11/02/22	Jeffrey Shaw	Researched solutions for transferring texts to computer in connection with subpoena.	1.40	340.00	476.00
11/02/22	Jeffrey Shaw	Attended call with counsel regarding document subpoena.	0.70	340.00	238.00
11/02/22	Ray Strong	Attended call with counsel regarding Zions subpoena received.	0.80	390.00	312.00

BRG INVOICE

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

Invoice # 147100
Client-Matter: 16222-025457

Date	Name	Description	Hours	Rate	Amount
11/03/22	Jeffrey Shaw	Analyzed files and documents to be produced pursuant to subpoena.	3.50	340.00	1,190.00
11/04/22	Jeffrey Shaw	Analyzed files and documents to be produced pursuant to subpoena.	4.20	340.00	1,428.00
11/07/22	Jeffrey Shaw	Prepared and uploaded files in connection with Zions subpoena.	2.10	340.00	714.00
11/07/22	Jeffrey Shaw	Call with BRG to discuss Zions subpoena.	1.30	340.00	442.00
11/07/22	Ray Strong	Discussed Zions/Lugli subpoena issue with Jeff Shaw for compliance.	1.30	390.00	507.00
11/08/22	Jeffrey Shaw	Coordinated call regarding Zions subpoena.	0.20	340.00	68.00
11/08/22	Jeffrey Shaw	Prepared files in connection with Zions subpoena.	0.90	340.00	306.00
11/08/22	Jeffrey Shaw	Emails regarding Zions subpoena.	0.20	340.00	68.00
11/09/22	Jeffrey Shaw	Meeting regarding Zions subpoena.	0.40	340.00	136.00
11/09/22	Jeffrey Shaw	Discussion with Utah AG regarding Zions subpoena.	0.20	340.00	68.00
11/09/22	Ray Strong	Attended call with counsel regarding Zions subpoena issues.	0.50	390.00	195.00
11/10/22	Jeffrey Shaw	Reviewed and prepared Zions subpoena documents.	1.40	340.00	476.00
11/10/22	Jeffrey Shaw	Discussions regarding Zions subpoena documents.	0.70	340.00	238.00
11/10/22	Ray Strong	Discussed Zions subpoena issues with BRG team.	0.30	390.00	117.00
11/11/22	Ray Strong	Analyzed case documents for Zions subpoena response.	0.50	390.00	195.00
11/15/22	Jeffrey Shaw	Coordinated access to Zions subpoena docs.	0.30	340.00	102.00
11/15/22	Jeffrey Shaw	Emails regarding QB files produced for litigation.	0.30	340.00	102.00
11/16/22	Jeffrey Shaw	Review and follow-up with Zion subpoena issues.	0.30	340.00	102.00
11/17/22	Jeffrey Shaw	Discussion, review and emails regarding document subpoena.	0.80	340.00	272.00
11/17/22	Jeffrey Shaw	Call with BRG counsel regarding document subpoena issues.	0.30	340.00	102.00

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Invoice # 147100
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Date	Name	Description	Hours	Rate	Amount
11/18/22	Jeffrey Shaw	Reviewed documents and emails regarding document subpoena.	0.50	340.00	170.00
11/21/22	Jeffrey Shaw	Met with Zions financial advisor regarding QB files.	0.50	340.00	170.00
11/21/22	Jeffrey Shaw	Emails and discussions regarding document production.	0.40	340.00	136.00
11/21/22	Ray Strong	Discussed Quickbooks production issues for Rust Rare coin file with BRG.	0.20	390.00	78.00
11/22/22	Jeffrey Shaw	Reviewed finalized set of documents to be produced and email regarding the same.	0.70	340.00	238.00
		Total for Task Code 720	**34.20**		**11,871.00**
Task Code: 950 - Fee Application Preparation & Hearing					
11/01/22	Jeffrey Shaw	Reviewed time entries and descriptions for Jul-Sep fee application.	0.80	0.00	N/C
11/02/22	Jeffrey Shaw	Prepared narrative for Jul-Sep fee application.	1.10	0.00	N/C
11/02/22	Jeffrey Shaw	Reviewed, finalized and submitted Jul-Sep bill.	0.90	0.00	N/C
11/07/22	Jeffrey Shaw	Reviewed and prepared fee application narrative.	0.50	0.00	N/C
11/09/22	Jeffrey Shaw	Reviewed, finalized and submitted Q3 invoice and narrative.	0.50	0.00	N/C
		Total for Task Code 950	**3.80**		**0.00**
Professional Services			**296.50**		**100,279.50**

DETAIL OF EXPENSES

Date	Description	Amount
Computer Software		
11/09/22	Shaw, Jeffrey - Payment of Expenses Computer Software on 2022-11-04. Line Number 1. Purchase of software in order to transfer text conversations with Gaylen Rust from iphone to computer. . . Expense Rept# 0100-5515-2523	34.99
	Total For Computer Software	**34.99**
Data Research		
10/31/22	TLOxp* (tlo.com)	11.68
	Total For Data Research	**11.68**

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Date	Description	Amount
Supplies		
10/11/22	Chaffos, Shelby - Payment of Expenses Office Supplies on 2022-10-05. Line Number 1. Flash Drive to download Larsen production (over 18 GBs) to give to counsel. . . Expense Rept# 0100-5449-1372 Timekeeper : 05330 - Chaffos, Shelby	12.92
	Total For Supplies	**12.92**
Expenses		**59.59**

EXHIBIT D

EXHIBIT D
SEVENTEENTH FEE APPLICATION
Proposed Order

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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 STATE OF UTAH DIVISION OF SECURITIES, through Attorney General Sean D. Reyes Plaintiffs, vs. RUST RARE COIN INC., a Utah corporation, GAYLEN DEAN RUST, an individual, DENISE GUNDERSON RUST, an individual, JOSHUA DANIEL RUST, an individual, Defendants; and ALEESHA RUST FRANKLIN, an individual, R LEGACY RACING INC, a Utah corporation, R LEGACY ENTERTAINMENT LLC, a Utah limited liability company, and R LEGACY INVESTMENTS LLC, a Utah limited liability company. Relief Defendants.	**ORDER GRANTING SEVENTEENTH INTERIM FEE APPLICATION** Civil No. 2:18-cv-00892-TC Judge Tena Campbell Magistrate Judge Dustin Pead

Before the Court is the seventeenth interim fee application (the "Fee Application"), submitted by Jonathan O. Hafen in his capacity as the Court-Appointed Receiver for Rust Rare Coin Inc., Gaylen Dean Rust, R Legacy Racing Inc., R Legacy Entertainment LLC, R Legacy Investments LLC, Denise Gunderson Rust, and Joshua Daniel Rust (collectively, "Defendants") seeking approval by the Court for the fees and expenses incurred by the Receiver; the Receiver's counsel, Parr Brown Gee & Loveless ("Parr Brown"); and the Receiver's accountants, Berkeley Research Group ("BRG"), for the period of October 1, 2022, through December 31, 2022 (the "Application Period"), and authorization to pay all allowed fees and expenses from funds of the Receivership Estate.

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

IT IS HEREBY ORDERED that:

1. The Fee Application is GRANTED; and

2. The Receiver is hereby authorized to pay the fees and expenses incurred by the Receiver, Parr Brown, and BRG, as follows:

a.	Receiver:	$17,630.00 for fees.
b.	Parr Brown:	$341,729.26 for fees and $605.32 for out-of-pocket expenses.
c.	BRG:	$100,279.50 for fees and $59.59 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 March 2023.

_____
Honorable Dustin B. Pead
United States Magistrate Judge