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Attorneys for Receiver Jonathan O. Hafen

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

COMMODITY FUTURES TRADING
COMMISSION, and
STATE OF UTAH DIVISION OF
SECURITIES, through Attorney General Sean
D. Reyes,

Plaintiffs,

vs.

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

Defendants;

and

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

Relief Defendants.

**TWENTY-SECOND INTERIM FEE
APPLICATION**

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

Judge Tena Campbell

Magistrate Judge Dustin Pead

Jonathan O. Hafen, the Court-Appointed Receiver over the assets of the following Defendants and Relief Defendants: Rust Rare Coin Inc. (“RRC”), Gaylen Dean Rust, R Legacy Racing Inc., R Legacy Entertainment LLC, R Legacy Investments LLC, Gaylen Dean Rust, Denise Gunderson Rust, Joshua Daniel Rust, and Aleesha Rust Franklin (collectively, “Receivership Defendants”), hereby submits this twenty-second interim fee application (this “Fee Application”), seeking approval by the Court for the fees and expenses incurred by the Receiver; the Receiver’s counsel, Parr Brown Gee & Loveless (“Parr Brown”) and Sacks Tierney P.A. (“Arizona Counsel”); and the Receiver’s accountants, Berkeley Research Group (“BRG”), for the period of January 1, 2024, through March 31, 2024 (the “Application Period”). The Receiver seeks authorization to pay all allowed fees and expenses from the Receivership Estate once the Receiver has recovered an amount equal to three times the fees requested in this Fee Application and allowed in prior applications. In support hereof, the Receiver states as follows:

I. RELEVANT BACKGROUND

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

2. The Receiver has filed his *Twenty-Second Quarterly Status Report*, which includes a status report for the period of January 1, 2024, through March 31, 2024 (the “Quarterly Status Report”).¹ The Quarterly Status Report provides a comprehensive description of the services performed by the Receiver and his professionals during the Application Period and is incorporated herein by reference.

II. REQUEST FOR COURT APPROVAL OF FEES AND EXPENSES

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

57. Subject to Paragraph 59 immediately below, the Receiver is authorized to solicit persons and entities (“Retained Personnel”) to assist him in carrying out the duties and responsibilities described in this Order. The Receiver shall not engage any Retained Personnel without first obtaining an Order of the Court authorizing such engagement.

58. The Receiver and Retained Personnel are entitled to reasonable compensation and expense reimbursement from the Receivership Estates. The Receiver and Retained Personnel shall not be compensated or reimbursed by, or otherwise entitled to, any funds from the Court, the CFTC, or the State of Utah. Such compensation shall require the prior review by Plaintiffs and approval of the Court.

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

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

5. During this Application Period, the Receiver and his professionals have provided actual and necessary services for the Receivership Estate as summarized below and detailed in the

¹ Docket No. 536 filed May 1, 2024.

Exhibits attached hereto. The Exhibits also detail the out-of-pocket expenses incurred by the professionals in rendering services to the Receivership Estate.

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

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

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

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

IV. SUMMARY OF AMOUNTS REQUESTED

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

a. Receiver: From January 1, 2024, through March 31, 2024, the Receiver billed a total of 64.6 hours for services to the Receivership Estate. The Receiver is seeking approval for the payment of fees and expenses totaling \$31,008. *See Exhibit A.*

b. Parr Brown: From January 1, 2024, through March 31, 2024, Parr Brown billed a total of 565.9 hours for legal services to the Receivership Estate. Parr Brown is seeking approval for the payment of fees and expenses totaling \$202,151.65 of which \$195,247.00 is for fees and \$6,904.65 is for out-of-pocket expenses. *See Exhibit B.* These amounts include a voluntary write down of \$8,529.50.

c. BRG: From January 1, 2024, through March 31, 2024, BRG billed a total of 142.40 hours providing forensic, tax, and general accounting services to the Receivership Estate. BRG is seeking approval for the payment of fees and expenses totaling \$48,468.37. *See Exhibit C.* These amounts include a voluntary write down of \$3,211.50.

d. Arizona Counsel: From January 1, 2024, through March 31, 2024, Arizona Counsel billed a total of 21.9 hours for legal services to the Receivership Estate. Arizona Counsel is seeking approval for the payment of fees and expenses totaling \$7,504.58. *See Exhibit D* (this number differs from Exhibit D as it removes \$39.19 in interest charges).

11. The amounts requested reflect a total of \$11,741.00 in voluntary reductions by the respective professionals in an exercise of their billing judgment.

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

three times the total amount of the fees requested in this and all previous fee applications.

V. SUMMARY OF EXHIBITS

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

14. The Receiver, Parr Brown, Arizona Counsel and BRG have maintained their time in records organized according to tasks, with each task record being maintained in chronological order.

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

Exhibit A—Time Records of Receiver

Exhibit A Summary by Task

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

Exhibit A-1 Administration of Receivership Estate

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

Exhibit A-2 Asset Analysis and Recovery

18. The Receiver worked closely with his legal counsel during the Application Period in negotiating favorable settlement agreements with net winners. These settlement efforts involved

extensive coordination with the Receiver's counsel and required the Receiver to review the supporting documentation and settlement agreements before their execution. The Receiver also worked with his legal counsel in several litigation matters with Claw Back Defendants. The Receiver continued coordinating with investors and their counsel to substantiate various metal transactions that were associated with such investors.

Exhibit A-5 Claims Administration

19. The Receiver and his team have completed the claims analysis process and are focused on resolving all remaining outstanding claims. Having resolved the vast majority of the claims, and as set forth in more detail in the Quarterly Status Report, the Receiver made three distributions to Claimants in the amount of over twenty-three million dollars.

Exhibit B-Time Records of Parr Brown

Exhibit B Summary by Task

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

Exhibit B-1 Administration of Receivership Estate

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

Exhibit B-2 Asset Analysis & Recovery

22. During the Application Period, Parr Brown continued to work the numerous claw back actions filed against scores of investors (the "Claw Back Defendants"). Parr Brown also

continued working with the many potential net winners (the “Net Winners”) with whom they executed tolling agreements in order to facilitate further discussions and negotiations regarding their transactions with the Receivership Defendants. As a result of the Court granting the Receiver’s Motion for Settlement Authority (*See* Dkt. No. 271), Parr Brown has worked closely with the Receiver to finalize agreements and negotiate with investors and creditors to increase the number of settlement agreements.

Exhibit B-3 Disposition of Assets

23. Parr Brown continues to work on the sale of certain intellectual property assets. The Receivership Estate owns the rights to hundreds of low-value songs and albums. Parr Brown has received offers to purchase such songs or albums ranging from a few hundred dollars to a few thousand dollars. In order to efficiently liquidate these, Parr Brown filed a motion with the Court seeking permission to sell music rights, without having to incur the expense of filing a motion and obtaining Court approval, if the sale is for less than \$7,500. The Court granted the motion, which has allowed the Receiver to sell lower value music rights “as is” while minimizing administrative expenses to the Receivership Estate.

Exhibit B-5 Claims Administration

24. Parr Brown previously submitted to the Court the Claims Registry packet, which identifies all 668 claims and includes the Claimants’ self-reported amount claimed, the allowed amount of the claim as determined by the Receiver, and—if applicable—an explanation of the Receiver’s determination and objection to all or part of the claim. Only five unresolved claims remain which are either involved in claw back litigation or are stayed by the Court. Parr Brown continues to diligently resolve each unresolved claim while minimizing expenses to the

Receivership Estate. Parr Brown also worked closely with the Receiver to make the initial distributions to Claimants in the amount of over twenty-three million dollars.

Exhibit C-Time Records of BRG

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

Claims Process & Distribution

26. BRG developed and prepared a distribution model consistent with the rising tide distribution methodology approved by the Receiver and the Court. BRG evaluated and followed-up regarding various issues in connection with the initial distribution, as well as updated claims data and the distribution model as necessary. BRG also analyzed various distribution scenarios as requested by the Receiver and his counsel. Further, BRG updated the distribution model with payment data and reviewed the status of the distributions. BRG also prepared and updated initial distribution schedules which were provided to the distribution agent for payment. BRG further assisted the Receiver in determining the requirements and tax implications for the Receivership in making payments for wage claims, including the setting up of the state payroll tax withholding accounts.

Recovery Litigation

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

28. Specifically, BRG performed extensive analyses and review of Rust Rare Coin's accounting records, point of sale data, and investor transaction data and support in connection with

current clawback litigation in which the Receiver is involved. BRG also reviewed deposition testimony given in this matter, as well as opposing expert reports which were produced. Finally, in response to the opposing expert reports produced in this matter, BRG prepared an expert rebuttal report, including exhibits and appendices. BRG also prepared an updated declaration and schedules in connection with this litigation.

29. BRG has continued to work with the Receiver and his counsel to analyze and review proposed settlement offers and financial information from investors to determine the appropriateness and accuracy of such offers, as well as claims concerning the ability to pay the amounts sought by the Receiver.

Tax Compliance and Analysis

30. BRG analyzed 2023 cash transactions to identify information returns required to be prepared and filed. BRG prepared the 2023 Form(s) 1099. The completed returns were reviewed to ensure completeness and accuracy. Corrections and updates were made as was necessary.

Exhibit D-Time Records of Arizona Counsel

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

VI. PRIOR REQUESTS AND INTERIM NATURE OF REQUEST

32. The Receiver has previously filed twenty-one interim fee applications,² all of which were approved by the Court. *See* Dkt. Nos. 153, 203, 247, 275, 293, 339, 368, 383, 414, 418, 429, 435, 443, 463, 482, 490, 495, 509, 517, 530 and 534. This is the Twenty-Second Interim Fee Application of the Receiver and his professionals. The Receiver and his professionals understand that the authorization and payment of fees and expenses is interim in nature. All fees and expenses allowed on an interim basis will be subject to final review at the close of the case and the discharge of the Receiver when the Receiver files a final accounting and the Receiver and his professional's file final fee applications.

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

² The Receiver's First Interim Fee Application was filed on February 22, 2019. *See* Dkt. No. 120. The Receiver's Second Interim Fee Application was filed on May 24, 2019. *See* Dkt. No. 187. The Receiver's Third Interim Fee Application was filed on September 4, 2019. *See* Dkt. No. 241. The Receiver's Fourth Interim Fee Application was filed on December 31, 2019. *See* Dkt. No. 274. The Receiver's Fifth Interim Fee Application was filed on March 10, 2020. *See* Dkt. No. 292. The Receiver's Sixth Interim Fee Application was filed on August 7, 2020. *See* Dkt. No. 333. The Receiver's Seventh Interim Fee Application was filed on November 13, 2020. *See* Dkt. No. 367. The Receiver's Eighth Interim Fee Application was filed on January 15, 2021. *See* Dkt. No. 382. The Receiver's Ninth Interim Fee Application was filed on May 27, 2021. *See* Dkt. No. 413. The Receiver's Tenth Interim Fee Application was filed on July 6, 2021. *See* Dkt. No. 416. The Receiver's Eleventh Interim Fee Application was filed on October 5, 2021. *See* Dkt. No. 428. The Receiver's Twelfth Interim Fee Application was filed on December 13, 2021. *See* Dkt. No. 434. The Receiver's Thirteenth Interim Fee Application was filed on February 22, 2022. *See* Dkt. No. 442. The Receiver's Fourteenth Interim Fee Application was filed on June 14, 2022. *See* Dkt. No. 461. The Receiver's Fifteenth Interim Fee Application was filed on September 12, 2022. *See* Dkt. No. 481. The Receiver's Sixteenth Interim Fee Application was filed on December 14, 2022. *See* Dkt. No. 488. The Receiver's Seventeenth Interim Fee Application was filed on March 14, 2023. *See* Dkt. No. 494. The Receiver's Eighteenth Interim Fee Application was filed on June 12, 2023. *See* Dkt. No. 508. The Receiver's Nineteenth Interim Fee Application was filed on September 20, 2023. *See* Dkt. No. 516. The Receiver's Twentieth Interim Fee Application was filed on December 13, 2023. *See* Dkt. No. 528. The Receiver's Twenty-First Interim Fee Application was filed on March 13, 2024. *See* Dkt. No. 533.

time entries, the fees and expenses that have been incurred are reasonable.

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

43. The Receiver respectfully requests that the Court enter an Order (i) approving, on an interim basis, the Receiver's fees and expenses in the amount of \$31,008.00; Parr Brown's fees in the amount of \$195,247.00 and out-of-pocket expenses of \$6,904.65; BRG's fees and expenses in the amount of \$48,468.37; Arizona Counsel's fees and expenses in the amount of \$7,504.58, and (ii) authorizing the Receiver to pay these fees and reimburse the expenses from the Receivership Estate once the Receiver has recovered for the Estate at least three times the amount of fees requested in this Fee Application and prior applications.

44. A proposed Order is attached hereto as **Exhibit E**.

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

DATED this 12th day of June 2024.

RECEIVER

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

PARR BROWN GEE & LOVELESS, P.C.

By: /s/ Joseph M.R. Covey

Joseph M.R. Covey

Jeffery A. Balls

Walter O. Peterson

Attorneys for Receiver Jonathan O. Hafen

BERKELEY RESEARCH GROUP

By: /s/ *Ray Strong

Ray Strong

**Electronically signed with permission*

SACKS TIERNEY P.A.

By: /s/ *Michael Harris

Michael Harris

**Electronically signed with permission*

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that service of the above **TWENTY-SECOND INTERIM FEE APPLICATION** was (1) electronically filed with the Clerk of the Court through the CM/ECF system on June 12, 2024, which sent notice of the electronic filing to all counsel of record, (2) posted on the Receiver's website (rustrarecoinreceiver.com), and (3) emailed to all those on the Receiver's master mailing matrix.

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<p>David C. Castleberry OGLETREE DEAKINS NASH SMOAK & STEWART PC 2050 South 1300 East, Ste 500 Salt Lake City, UT 84106 david.castleberry@ogletreedeakins.com</p>	

/s/ Lori Stumpf

EXHIBIT A

EXHIBIT A

TWENTY-FIRST INTERIM FEE APPLICATION

Time Records of Receiver

EXHIBIT A

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

Rust Rare Coin Receiver

May 14, 2024

Invoice: 943973
Client: 177110
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration

Professional Services	\$ 1,824.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 1,824.00



PARR BROWN GEE & LOVELESS

Invoice: 943973
 Rust Rare Coin Receiver
 Administration

May 14, 2024
 Client: 177110
 Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/30/24	JOH	Further review of report; Email with legal counsel re same; Attention to clawback action	1.30	624.00
1/31/24	JOH	Email with legal counsel re quarterly report; Follow up re issue re late-filed claim; Meet with claimant; Follow up re banking question; Review email correspondence and documents re bankruptcy matter	2.50	1,200.00

TOTAL PROFESSIONAL SERVICES \$ 1,824.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	480.00	3.80	1,824.00
TOTALS		3.80	\$ 1,824.00

TOTAL THIS INVOICE \$ 1,824.00

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

Rust Rare Coin Receiver

May 14, 2024

Invoice: 943973
Client: 177110
Matter: 1

REMITTANCE ADVICE

RE: Administration

BALANCE DUE THIS INVOICE

\$ 1,824.00

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 # 943973

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

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



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

Rust Rare Coin Receiver

May 14, 2024

Invoice: 943974
Client: 177110
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Assett Analysis & Recovery

Professional Services	\$ 27,456.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 27,456.00



PARR BROWN GEE & LOVELESS

Invoice: 943974
 Rust Rare Coin Receiver
 Asset Analysis & Recovery

May 14, 2024
 Client: 177110
 Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/02/24	JOH	Attention to clawback action	.30	144.00
1/03/24	JOH	Attention to two clawback actions; Email with legal counsel re bankruptcy matter and related issues; Email with legal counsel re clawback action and claims	1.10	528.00
1/08/24	JOH	Attention to various clawback actions and claim disputes; Review email correspondence from legal counsel; Review legal authorities	1.30	624.00
1/12/24	JOH	Prepare for mediation in clawback action; Attention to clawback action; Email with legal counsel re various matters	1.40	672.00
1/15/24	JOH	Attention to clawback action; Emailing with legal counsel re settlement	.40	192.00
1/16/24	JOH	Attention to multiple clawback actions; Preparing for mediation; Meeting with legal counsel re upcoming mediation and related matters; Further preparations for mediation; Follow up re notice of distribution	2.70	1,296.00
1/17/24	JOH	Further preparations for mediation; Attention to additional clawback action	.80	384.00
1/18/24	JOH	Preparing for and attending mediation; Reviewing information from bank; Follow up re same; Attention to clawback action	5.40	2,592.00
1/23/24	JOH	Attention to various claims; Email with opposing counsel re same; Follow up with legal counsel re same; Follow up re financial disclosures in clawback action; Email with legal counsel re same	1.60	768.00
1/26/24	JOH	Attention to clawback actions; Initial review of report; Email with legal counsel re same	.90	432.00
2/01/24	JOH	Attention to clawback litigation	.20	96.00
2/02/24	JOH	Attention to clawback litigation; Review related email correspondence; Follow up with legal counsel re same; Follow up re vendor claim	.70	336.00
2/06/24	JOH	Attention to clawback action; Follow up with legal counsel re same	.40	192.00
2/07/24	JOH	Attention to two clawback actions	.40	192.00
2/08/24	JOH	Attention to two clawback actions	.50	240.00
2/12/24	JOH	Attention to two clawback actions	.70	336.00
2/16/24	JOH	Attention to clawback action; Email with CFTC re proposed consent order; Follow up re same	.50	240.00
2/21/24	JOH	Attention to three clawback actions	.70	336.00
2/22/24	JOH	Attention to clawback action; Call with legal counsel re same; Follow up re related claim issue; Attention to inquiry from claimant; Email with legal counsel re upcoming mediation	1.70	816.00
2/23/24	JOH	Remotely participate in mediation in clawback action; Call with counsel re same; Email with legal counsel re clawback action; Review documents re same clawback action	1.50	720.00
2/26/24	JOH	Attention to clawback action; Follow up re status of unresolved claim; Review documents	1.30	624.00
2/28/24	JOH	Attention to proposed order; Follow up with legal counsel re same; Follow up re potential clawback settlement; Review documents	1.40	672.00

PARR BROWN GEE & LOVELESS

Invoice: 943974
 Rust Rare Coin Receiver
 Asset Analysis & Recovery

May 14, 2024
 Client: 177110
 Matter: 2

Date	Tkpr	Description	Hours	Amount
2/29/24	JOH	Attention to clawback action; Review related documents	.70	336.00
3/01/24	JOH	Attention to two clawback actions; Call with legal counsel re clawback action; Attention to proposed consent order; Email with legal counsel re same; Review vendor invoice	1.70	816.00
3/04/24	JOH	Attention to clawback action; Review email correspondence re same; Review documents relating to claim	1.10	528.00
3/06/24	JOH	Attention to three clawback actions; Meet with legal counsel re same; Analyze prior filings for use in clawback action briefing	1.80	864.00
3/06/24	JOH	Attention to three clawback actions; Meet with legal counsel re same; Analyze prior filings for use in clawback action briefing	1.80	864.00
3/07/24	JOH	Attention to multiple clawback actions; Follow up with legal counsel re same; Review documents relating to same; Attention to vendor claim	3.10	1,488.00
3/08/24	JOH	Follow up re filing re Arizona counsel; Attention to clawback action; Review documents and related email correspondence	1.60	768.00
3/11/24	JOH	Attention to two clawback actions; Review documents and email correspondence re potential settlement; Follow up with legal counsel re same	1.40	672.00
3/12/24	JOH	Attention to two clawback actions	.90	432.00
3/13/24	JOH	Attention to clawback action; Meet and Email with legal counsel re same	1.40	672.00
3/14/24	JOH	Prepare for and attend meet with legal counsel re clawback action and related matters; Review documents and related email correspondence; Attention to claim; Additional meet with legal counsel re clawback action	2.90	1,392.00
3/15/24	JOH	Attention to clawback action; Review pleading and related documents; Review legal authorities; Email with legal counsel re various matters	2.20	1,056.00
3/19/24	JOH	Attention to three clawback actions; Review documents re same; Follow up re motion for summary judgment; Review revised pleading and related email correspondence	1.50	720.00
3/20/24	JOH	Email with legal counsel re clawback action; Completing review of pleading; Review related documents and legal authorities; Email with client re litigation strategy and upcoming meet	3.20	1,536.00
3/21/24	JOH	Attention to clawback action; Review email correspondence from opposing counsel re same	1.20	576.00
3/22/24	JOH	Attention to clawback action; Follow up re mediation scheduling	1.00	480.00
3/25/24	JOH	Prepare for and attend meet with legal counsel re case strategy in clawback action; Follow up re mediation rescheduling and related matters; Call with mediator	1.70	816.00
3/26/24	JOH	Attention to two clawback actions; Email with legal counsel re same; Review related documents; Call with mediator	.80	384.00
3/29/24	JOH	Attention to two clawback actions; Review documents and related email correspondence, call with legal counsel re case strategy in clawback action	1.30	624.00

TOTAL PROFESSIONAL SERVICES

\$ 27,456.00

PARR BROWN GEE & LOVELESS

Invoice: 943974
Rust Rare Coin Receiver
Asset Analysis & Recovery

May 14, 2024
Client: 177110
Matter: 2

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	480.00	57.20	27,456.00
TOTALS		57.20	\$ 27,456.00

TOTAL THIS INVOICE

\$ 27,456.00

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

Rust Rare Coin Receiver

May 14, 2024

Invoice: 943974
Client: 177110
Matter: 2

REMITTANCE ADVICE

RE: Assett Analysis & Recovery

BALANCE DUE THIS INVOICE \$ 27,456.00

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 # 943974

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

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



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

Rust Rare Coin Receiver

May 14, 2024

Invoice: 943975
Client: 177110
Matter: 5

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Claims Administration

Professional Services	\$ 1,728.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 1,728.00

PARR BROWN GEE & LOVELESS

Invoice: 943975
 Rust Rare Coin Receiver
 Claims Administration

May 14, 2024
 Client: 177110
 Matter: 5

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/05/24	JOH	Attention to distribution to claimants; Email with counsel re same and related matters; Follow up re check authorization and other matters	1.40	672.00
1/09/24	JOH	Email with legal counsel re distributions and claims; Follow up re same; Review materials relating to clawback litigation	1.60	768.00
1/10/24	JOH	Attention to notice of distribution and related matters	.10	48.00
2/10/24	JOH	Joshua Bryan - Follow up re completing distribution of settlement payments	.50	240.00

TOTAL PROFESSIONAL SERVICES **\$ 1,728.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	480.00	3.60	1,728.00
TOTALS		3.60	\$ 1,728.00

TOTAL THIS INVOICE **\$ 1,728.00**

**PARR BROWN
GEE & LOVELESS**

ATTORNEYS AT LAW

Rust Rare Coin Receiver

May 14, 2024

Invoice: 943975
Client: 177110
Matter: 5

REMITTANCE ADVICE

RE: Claims Administration

BALANCE DUE THIS INVOICE

\$ 1,728.00

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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

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Account #: 912454114

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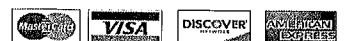


EXHIBIT B

EXHIBIT B

TWENTY-FIRST INTERIM FEE APPLICATION

Time Records of Parr Brown

EXHIBIT B

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

Rust Rare Coin Receivership

May 14, 2024

Invoice: 943969
Client: 176430
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration of Receivership Estate

Professional Services	\$ 8,528.00
Total Costs Advanced	<u>\$ 2,754.74</u>
TOTAL THIS INVOICE	\$ 11,282.74



PARR BROWN GEE & LOVELESS

Invoice: 943969
 Rust Rare Coin Receivership
 Administration of Receivership Estate

May 14, 2024
 Client: 176430
 Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/03/24	WOP	Review docket; Review comments to prior quarterly reports; Begin draft of quarterly report	1.60	504.00
1/15/24	WOP	Review docket history; Review attorney time sheets; Correspond with attorneys re updates for quarterly report; Begin draft of same	4.60	1,449.00
1/18/24	JMC	Review scheduling issues for ancillary proceeding	.20	92.00
1/18/24	JAB	Conference with Robert Wing re mediation; Conference with Walter Peterson re quarterly report	.60	237.00
1/18/24	WOP	Office conference with Jeff Balls re status; Review receiver's website re distribution; Review previous quarterly reports; Continue draft of same	3.50	1,102.50
1/19/24	WOP	Continue draft of quarterly report; Correspond with Kathy Bates re same; Review receivership ledger; Correspond with Jeff Balls	2.70	850.50
1/22/24	WOP	Continue draft of quarterly report	1.30	409.50
1/23/24	JMC	Correspond with Walter Peterson re quarterly application; Review and analyze application; Correspond with Jeff Balls re the same	.60	276.00
1/23/24	JAB	Review quarterly report	.50	197.50
1/23/24	WOP	Finish draft of quarterly report; Create exhibits; Correspond with Jeff Balls and Joe Covey re same	2.60	819.00
1/25/24	JMC	Review 21st quarterly report; Correspond with Jon Hafen and Jeff Balls re the same	.40	184.00
1/26/24	JMC	Correspond with Jeff Balls and Jon Hafen re quarterly report	.30	138.00
1/26/24	WOP	Review Jeff's comments to quarterly report; Create new exhibits for same; Email correspondence with Joe re same	.50	157.50
1/30/24	JMC	Correspond with Jon Hafen re quarterly report	.10	46.00
1/31/24	JMC	Review and revise the twenty-first quarterly status report; Correspond with Jon Hafen and Jeff Balls re the same; Coordinate filing, serving and posting of the status report	.50	230.00
2/19/24	JMC	Review deposits and other transfers	.10	46.00
2/26/24	JMC	No Charge - Correspond with Walter Peterson re fee application issues	.10	N/C
2/26/24	WOP	No Charge - Revise time sheets; Correspond with Joe re fee application; Draft the same	2.70	N/C
2/27/24	WOP	No Charge - Correspond with BRG and Wayne re fee application; Review and redact time records re same; Review docket report	3.20	N/C
2/27/24	WOP	No Charge - Continue draft of quarterly report; Correspond with Caralee re same	2.90	N/C
2/28/24	JMC	No Charge - Correspond with Walter Peterson re fee application	.10	N/C
2/28/24	JAB	No Charge - Review attorney fee application	.60	N/C
2/28/24	WOP	No Charge - Review attorney time records again due to billing errors; Correspond with Caralee re same; Correspondence with BRG; Complete initial draft of fee application for Joe's review pending BRG's narrative	5.40	N/C

PARR BROWN GEE & LOVELESS

Invoice: 943969
 Rust Rare Coin Receivership
 Administration of Receivership Estate

May 14, 2024
 Client: 176430
 Matter: 1

Date	Tkpr	Description	Hours	Amount
2/29/24	WOP	No Charge - Correspond with BRG re time records for fee application; Revise the same	.90	N/C
3/01/24	JMC	No Charge - Correspond with Jon Hafen and Walter Peterson re twenty- first fee application	.50	N/C
3/01/24	JMC	Correspond with Monique McElwee re government's consent order; Review order	.70	322.00
3/01/24	WOP	No Charge - Continue revisions of fee application	1.80	N/C
3/04/24	JMC	No Charge - Correspond with Jon Hafen and Caralee Marsh re fee application issues; Correspond with Jeff Balls re new fee application	1.10	N/C
3/04/24	JAB	Review attorney fees motion; Review order re engaging counsel; Correspond with Joseph Covey	.60	237.00
3/04/24	WOP	No Charge - Call with Joe Covey re revising fee application to provide for fees to be paid to Arizona counsel; Call with Matt Ball re same; Revise fee application re same; Revise all exhibits; Make further revisions per Joe's comments	2.60	N/C
3/05/24	JMC	No Charge - Review and revise fee application; Correspond with Walter Peterson, Jeff Balls and other governmental officials re the same	2.10	N/C
3/05/24	JMC	Correspond with Jeff Balls re employment of Arizona counsel; Review and analyze receivership order	.60	276.00
3/05/24	WOP	No Charge - Correspond with Jeff and Joe re including Arizona counsel on fee application	.40	N/C
3/07/24	JMC	Correspond with Wally Bugden and Jacob Strain re Denise Rust restitution issues	.30	138.00
3/07/24	LH	Communicate with claimants by telephone and email re distribution checks and update claims registry re new addresses; Document management; Emails with Jeff Balls re checks to be canceled and reissued	2.30	540.50
3/09/24	JMC	Correspond with Jeff Balls and Jacob Strain re Denise Ruse restitution obligations	.30	138.00
3/13/24	JMC	No Charge - Correspond with Jennifer Korb re fee application	.20	N/C
3/14/24	JMC	No Charge - Correspond with the CFTC re approval of fee application; Coordinate filing of fee application	.20	N/C
3/21/24	JMC	No Charge - Correspond with Jeff Balls re fee application	.10	N/C
3/28/24	JMC	Correspond with Jeff Balls re Denise Rust issues and related matters	.30	138.00

TOTAL PROFESSIONAL SERVICES

\$ 8,528.00

PARR BROWN GEE & LOVELESS

Invoice: 943969
 Rust Rare Coin Receivership
 Administration of Receivership Estate

May 14, 2024
 Client: 176430
 Matter: 1

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	460.00	4.40	2,024.00
Jeffery A Balls	395.00	1.70	671.50
Walter O Peterson	315.00	16.80	5,292.00
Lori Henry - Paralegal	235.00	2.30	540.50
TOTALS		25.20	\$ 8,528.00

COSTS ADVANCED

Date	Description	Amount
1/21/24	Grasshopper.com	19.69
1/31/24	PACER Electronic Court Records	4.50
2/21/24	Grasshopper.com	19.68
2/23/24	Caputo's - Muir mediation lunch	133.68
2/26/24	James Dodge Russell & Stephens - Jeanne Muir mediation	2,557.50
3/21/24	Grasshopper.com	19.69

TOTAL COSTS ADVANCED \$ 2,754.74

TOTAL THIS INVOICE \$ 11,282.74

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

Rust Rare Coin Receivership

May 14, 2024

Invoice: 943969
Client: 176430
Matter: 1

REMITTANCE ADVICE

RE: Administration of Receivership Estate

BALANCE DUE THIS INVOICE \$ 11,282.74

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 # 943969

Online Payments: <https://parrbrown.com/payment-portal>
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**PARR BROWN
GEE & LOVELESS**
ATTORNEYS AT LAW

Rust Rare Coin Receivership

May 14, 2024

Invoice: 943970
Client: 176430
Matter: 2

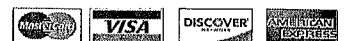
INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Asset Analysis & Recovery

Professional Services	\$ 146,568.00
Total Costs Advanced	<u>\$ 4,149.91</u>
TOTAL THIS INVOICE	\$ 150,717.91



PARR BROWN GEE & LOVELESS

Invoice: 943970
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

May 14, 2024
 Client: 176430
 Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/02/24	MTH	Review correspondence from BK trustee in Nelson matter and correspond with Joe Covey re same	.10	43.00
1/02/24	JAB	Correspond with Blake Faulkner re quit claim deed; Correspond with Jeff Shaw re settlements; Review litigation matters	.50	197.50
1/02/24	CMM	Review communications with the trustee in Nelson bankruptcy matter; Research questions about bankruptcy code for the same; Communicate with BRG experts re Larsen rebuttal report	3.40	1,003.00
1/03/24	RMB	Review Rico and Andreini files in connection with resolving outstanding claw-back claims	.90	391.50
1/03/24	JAB	Telephone conference with Steve Waterman; Correspond with Jonathan Hafen	.90	355.50
1/03/24	CMM	Communicate with trustee and Parr Brown team re Nelson matter; Communicate with Jory Trease re attorney planning meeting	.50	147.50
1/04/24	JMC	Correspond with Michael Hoppe, Mike Thomson and Claire McGuire re Darren Nelson attorney planning meeting and lawsuit; Correspond with Michael Hoppe and Claire McGuire re Darren Nelson meeting	1.50	690.00
1/04/24	MTH	Review correspondence from opposing counsel and initial disclosures in preparation for attorney planning meeting in Nelson matter; Correspond with Claire McGuire re attorney planning meeting in Nelson matter	.30	129.00
1/04/24	MTH	Conference with Claire McGuire re attorney planning meeting in Nelson matter	.20	86.00
1/04/24	MTH	Attorney planning meeting with opposing counsel in Nelson matter; Conference with Claire McGuire re Nelson matter; Meeting with Joe Covey and Claire McGuire re Nelson matter	1.50	645.00
1/04/24	JAB	Telephone conference with Peter Guyon; Correspond with Tom Melton and Claire McGuire	.40	158.00
1/04/24	CMM	Conduct attorney planning conference with opposing counsel and Michael Hoppe in the Nelson matter; Revise report for filing; Meet with Michael Hoppe and Joseph Covey re amendment issues; Communicate with Mr. Trease re revised report; Review communications with the trustee re companion action	4.80	1,416.00
1/04/24	CMM	Attorney conference with Jeffery Balls re Guyon request for settlement information and attempt at settling claims against children	.40	118.00
1/04/24	TMF	Participate in attorney conference re bankruptcy nondischarge complaint against Darren Nelson	.60	168.00
1/04/24	RGW	Revise Woodfin settlement; Email with Mark Pugsley	.60	270.00
1/05/24	JMC	Review and analyze complaint against Darren Nelson; Correspond with Mike Thomson, Michael Hoppe and Claire McGuire re Darren Nelson non-discharge action and related issues	1.50	690.00
1/05/24	MTH	Review draft attorney planning meeting report and suggest revisions; Correspond with Claire McGuire re same; Meeting with BK trustee and legal team re 727 action in Nelson case	1.20	516.00

PARR BROWN GEE & LOVELESS

Invoice: 943970
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

May 14, 2024
 Client: 176430
 Matter: 2

Date	Tkpr	Description	Hours	Amount
1/05/24	CMM	Communicate with Micheal Hoppe re issues with amendment timing; Communicate with opposing counsel re filing of report and further edits to the same; Call with trustee in the Darren Nelson matter; Meeting with Joseph Covey and Michael Hoppe re the same; Research amendment issue on 727 claims	5.50	1,622.50
1/08/24	JMC	Correspond with Claire McGuire and Michael Hoppe re amendment of complaint and legal research on the same; Correspond with Jeff Balls re Leland Jacobson settlement and claims issue	1.10	506.00
1/08/24	MTH	Conference with Joe Covey re case strategy and approach in Nelson matter	.30	129.00
1/08/24	MTH	Review research re 727 action in Nelson matter; Review correspondence from opposing counsel in Nelson; Conference with Claire McGuire re changes to attorney planning meeting report in Nelson	.50	215.00
1/08/24	MJB	(Hafen v. Howell) Correspond with Michael Harris (0.1); Correspond with Joe Covey (0.1)	.20	85.00
1/08/24	JAB	Review litigation matters; Correspond with Peter Guyon; Call Ryan Pahnke; Correspond with Jon Hafen re settlement	1.00	395.00
1/08/24	CMM	Research amendment standard in adversary proceedings for Nelson matter; Draft research summary for trustee; Attorney conference with Joseph Covey re the same; Communicate with trustee re research; Revise report per comments from opposing counsel; Communicate with Micheal Hoppe re the same; Communicate with opposing counsel re stipulated report in Nelson matter	6.10	1,799.50
1/09/24	MJB	(Hafen v. Howell) Correspond with Michael Harris (0.3)	.30	127.50
1/09/24	JAB	Telephone conference with Ryan Pahnke; Draft motion to extend expert deadlines for Sagarin; Telephone conference with Judson Pitts; Review settlement payments	1.40	553.00
1/09/24	CMM	Research and draft summary judgement motion	2.80	826.00
1/10/24	JAB	Review status of settlement agreements; Correspond with Peter Guyon; Correspond with Matthew Barneck	1.40	553.00
1/10/24	CMM	Review issues with Guyon case; Communicate with Parr Brown team re the same; Research issues with prejudgment interest	2.60	767.00
1/10/24	CBB	Review event deadlines; Review communication with opposing counsel; Review system files for pre-trial disclosures in a Rust matter; Email Jeff Balls re pre-trial disclosures	.30	99.00
1/10/24	TMM	Draft and file Mouritsen dismissal	.30	135.00
1/11/24	JAB	Review settlement offer from Peter Guyon	.10	39.50
1/11/24	CMM	Communicate with opposing counsel re filing of report; Finalize report for filing; Research procedural issues for bankruptcy adversary proceeding; Research and draft summary judgement motion; Communicate with potential defendant re settlement issues; Research net winner analysis for potential settlement agreement	8.00	2,360.00
1/11/24	CBB	In Muir matter, discuss pre-trial disclosures with Jeff Balls	.10	33.00
1/12/24	JAB	Review documents for Oberhansly	1.10	434.50

PARR BROWN GEE & LOVELESS

Invoice: 943970
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

May 14, 2024
 Client: 176430
 Matter: 2

Date	Tkpr	Description	Hours	Amount
1/12/24	CMM	Review settlement offer from potential claw back defendant; Draft internal recommendation re the same; Draft argument section of new summary judgement motion	4.30	1,268.50
1/12/24	CBB	In Percell matter, discuss delivery of settlement check with opposing counsel; Receive settlement check; Report on receipt of settlement check to opposing counsel, firm accountant, and Receiver	.30	99.00
1/12/24	RGW	Email with Jeff Balls re Oberhansly mediation; Revise mediation statement to reflect new position expressed by Mr. Oberhansly	2.00	900.00
1/15/24	MTH	Review deadlines and notifications re case	.10	43.00
1/15/24	CMM	Research and draft summary judgement motion in the Larsen et al case; Research statements made by defendant for Nelson matter	5.20	1,534.00
1/15/24	CBB	Review past communications with opposing counsel in Muir matter; Review pre-trial disclosures in related Rust matter in preparation for drafting pre-trial disclosures in this matter; Draft and send email to opposing counsel re potential for settlement and set up call with opposing counsel	.70	231.00
1/16/24	MTH	Review correspondence from Claire McGuire re summary judgment motion in Larsen case	.10	43.00
1/16/24	JAB	Review expert report of Mark Hashimoto	.60	237.00
1/16/24	CMM	Research and draft summary judgement motion for Larsen matter	3.90	1,150.50
1/16/24	CBB	Prepare for and participate in call with opposing counsel re settlement in Muir matter, discovery extensions, and the potential for mediation; Draft and send email memo to Joe Covey re mediation; Review expert report from opposing counsel and forward to Jeff Shaw for review	1.40	462.00
1/16/24	RGW	Email to counsel for Bo Oberhansly; Review attachments	.50	225.00
1/17/24	JAB	Telephone conference with Peter Guyon	.30	118.50
1/17/24	LH	Meeting with Jeff Balls re returned distribution checks and updating claims registry; Review Frank Freno message; Conference call with Frank Freno re updated address; Review returned checks; Review claims registry re addresses; Review emails re same	.80	188.00
1/18/24	CMM	Review settlement proposal from potential claw back defendant; Attorney conference with Parr Brown team re the same; Research pre judgement interest issue; Research issue related to motion to dismiss; Review consigned items for settlement agreement; Review appendices; Communicate with opposing counsel re the same	4.40	1,298.00
1/18/24	RGW	Prepare for and attend mediation; Conference with Jonathan Hafen re steps forward after mediation; Call with Margaret Busse and emails with Utah Department of Commerce	6.00	2,700.00
1/18/24	LH	Review emails and voicemails from claimants; update claims registry for claimants with address changes; Email claimants re change of address and respond to questions about checks; Update addresses on returned checks and mail same	1.20	282.00

PARR BROWN GEE & LOVELESS

Invoice: 943970
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

May 14, 2024
 Client: 176430
 Matter: 2

Date	Tkpr	Description	Hours	Amount
1/18/24	LH	Review email from Gloria Bowman; Review claims registry to confirm addresses; Update addresses for Katherine and Sarah Bowman; Email to Gloria Bowman to respond to questions re checks and address changes for multiple Bowman claimants; email Jeff Balls re distribution checks	.50	117.50
1/19/24	CBB	In Muir matter, discuss potential settlement with opposing counsel; Draft and revise stipulated motion for extension of deadlines and accompanying proposed order; Go back and forth with opposing counsel over revisions; Effectuate filing and service	2.80	924.00
1/22/24	MTH	Review case issues re Nelson matter	.10	43.00
1/23/24	RGW	Prepare request for documents to Oberhansly	.80	360.00
1/23/24	LH	Read and respond to emails from Joshua Larsen re address change and questions about canceling and reissuing checks; email to Jeff Balls re same	.20	47.00
1/24/24	JAB	Revise quarterly report; Review bank account information; Conference with Robert Wing	2.30	908.50
1/24/24	CMM	Review initial disclosures in claw back action; Draft summary of the same; Research bankruptcy law related to timing and type of statements; Research additional record keeping claim; Draft new discovery requests; Draft complaint for new claw back action; Review docket for open matters; Revise motion for default	9.90	2,920.50
1/24/24	RGW	Analyze issues re Oberhansly settlement	1.10	495.00
1/25/24	JAB	Review bank account information; Review settlement proposal for Peter Guyon group; Correspond with Receiver team re same	.50	197.50
1/25/24	CBB	Discuss Muir's expert report with Jeff Shaw	.10	33.00
1/25/24	RGW	Emails with Jeff Balls re Guyon settlement offer	.40	180.00
1/25/24	TMM	Review settlement offer; emails re same	.20	90.00
1/25/24	LH	Read and respond to emails from Jenn Sprague; look through returned checks; prepare mailing and send check to corrected address provided by Jenn Sprague	.30	70.50
1/26/24	CBB	In Muir claw back action, discuss Muir's expert report with Jeff Shaw	.10	33.00
1/29/24	JMC	Correspond with Lori Stumpf re logging of additional coins	.20	92.00
1/29/24	MTH	Correspond with team re Nelson case and amending complaint; Correspond with Claire McGuire re summary judgment motion in Larsen matter	.20	86.00
1/29/24	MJB	(Hafen v. Howell) Correspond with Michael Harris (0.1)	.10	42.50
1/29/24	JAB	Review correspondence re litigation; Correspond with Peter Guyon re settlement	.50	197.50
1/29/24	JAB	Telephone conference with Steve Waterman; Conference with Matt Ball; Correspond with Jonathan Hafen	.40	158.00

PARR BROWN GEE & LOVELESS

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Date	Tkpr	Description	Hours	Amount
1/29/24	CMM	Attorney conference with Micheal Hoppe and Joseph Covey re amendment of complaint in Nelson matter; Review scheduling order; Communicate with potential claw back defendant; Revise summary judgement motion fact section	4.60	1,357.00
1/29/24	CBB	Prepare for and participate in call with Jeff Shaw re Muir's expert report; Email opposing counsel re date to mediate Muir matter	.80	264.00
1/29/24	LH	Read and respond to emails with claimants re distribution checks; calls with claimants re checks and new mailing addresses; prepare new mailings and send same; update claims registry; meet with Jeff Balls re same	1.50	352.50
1/30/24	MTH	Review and respond to correspondence from Claire McGuire re Nelson case	.10	43.00
1/30/24	JAB	Review summary judgment motion; Telephone conference with Peter Guyon	.70	276.50
1/31/24	JMC	Correspond with Michael Hoppe and Claire McGuire re Darren Nelson non-discharge action; Review and analyze trustee's complaint	1.10	506.00
1/31/24	MTH	Review and revise draft summary judgment motion in Larsen matter; Correspond with Claire McGuire re SJ motion; Review 727 complaint in Nelson bankruptcy; Correspond with Joe Covey re same	1.00	430.00
1/31/24	JAB	Revise motion for summary judgment; Correspond with Blake Faulkner	2.10	829.50
1/31/24	CMM	Revise summary judgment motion per comments from Michael Hoppe; Attorney conference re the same with Jeffery Balls; Review complaint and exhibits filed by Trustee in the adversary proceeding against Nelson; Research issues related to the same	5.20	1,534.00
1/31/24	LH	Read and respond to emails; document management	.30	70.50
2/01/24	JMC	Correspond with Chauncey Bird re Muir mediation; Correspond with Michael Hoppe re Darren Nelson lawsuit	.40	184.00
2/01/24	MJB	(Hafen v. Howell) Review title report (0.1); Correspond with Michael Harris (0.1)	.20	85.00
2/01/24	CMM	Communicate with Joseph Covey and Michael Hoppe re Nelson litigation; Review complaint from Trustee; Review deposition of Darren Nelson; Revise litigation deadlines and checklists	5.20	1,534.00
2/01/24	CBB	In Muir matter, coordinate with opposing counsel and mediator Mark James to set up mediation	.40	132.00
2/02/24	JMC	Correspond with Michael Hoppe, Claire McGuire, Jeff Balls and others re Darren Nelson legal strategy; Review litigation papers; Correspond with Mike Thomson re the same	2.00	920.00
2/02/24	MTH	Review and respond to correspondence from Claire McGuire and Tammy Frisbee re Nelson matter	.10	43.00
2/02/24	MTH	Meeting with Joe Covey and Claire McGuire re Darren Nelson case and Larsen case; Meeting with Jeff Balls re Darren Nelson case and Larsen case	1.60	688.00
2/02/24	JAB	Conference with Joseph Covey, Michael Hoppe, and Claire McGuire re Nelson bankruptcy	1.00	395.00

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2/02/24	CMM	Prepare for and attend attorney conference with Micheal Hoppe, Tammy Frisbee, and Joseph Covey re Nelson case; Review documents from case; Draft discovery requests; Review trustees 727 complaint; Research 727 actions and potential resolutions	5.60	1,652.00
2/02/24	CBB	Discuss mediation in Muir matter with Mark James's (mediator) office	.30	99.00
2/02/24	TMF	Review and analyze 727 complaint, including 2004 exam transcript excerpt and other exhibits, filed by bankruptcy trustee against Darren Nelson	.30	84.00
2/02/24	TMF	Team meeting re strategy for Darren Nelson non-discharge complaint proceedings in light of bankruptcy trustee's filing of section 727 complaint	.80	224.00
2/02/24	LH	Review voicemails and emails and returned checks; resolve issue with Christopher Lyman; communicate with Jeff Balls re same; send emails and make calls to claimants re returned checks and updated address; update claims registry; phone conference with Jeff Ball re canceling and reissuing checks; create list of claimants that haven't received checks and we haven't received them back in the mail so we can cancel and reissue; email Jeff Balls list of people; locate phone numbers and call claimants that have returned checks to get updated address and re-mail checks	2.90	681.50
2/05/24	JMC	Review and revise Larsen motion for summary judgment; Correspond with Claire McGuire re the same	1.90	874.00
2/05/24	JAB	Revise summary judgment for Larsen; Correspond with Blake Faulkner	1.90	750.50
2/05/24	CMM	Review revisions sent by Michael Hoppe to summary judgement motion; Revise summary judgement motion; Research additions to fact section for the same; Review additional edits from Jeffery Balls and incorporate the same; Communicate with trustee re 727 action; Review communications re the auction of Rust family items	4.90	1,445.50
2/05/24	CBB	In Muir matter, execute and send mediation agreement to the office of Mark James	.10	33.00
2/05/24	LH	Review messages from Christopher Lyman; read and respond to multiple emails from Selver Zalic; update list of claimants requesting reissued checks; communicate with Jeff Balls re all; locate phone number and address for Ted Carlisle check; leave message with Cindy Jensen re bad address and returned check; remail check	.70	164.50
2/06/24	JMC	Correspond with Jeff Balls re Larsen summary judgment motion	.60	276.00
2/06/24	MTH	Correspond with Jeff Balls and Claire McGuire re question from Gary Laramie	.10	43.00
2/06/24	MTH	Review and respond to correspondence from Jeff Balls re Josh Rust	.10	43.00
2/06/24	MJB	(Hafen v. Howell) Edit execution papers (0.7); Correspond with Jon Hafen (0.1)	.80	340.00
2/06/24	JAB	Review Howell appellate brief; Conference with Joseph Covey; Correspond with Michael Hoppe	3.80	1,501.00

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Date	Tkpr	Description	Hours	Amount
2/06/24	CMM	Communicate with potential claw back action defendants re settlement; Draft settlement proposal; Review communications re sale of private property from Rust family; Attorney conference with Joseph Covey re summary judgment edits and strategy	5.20	1,534.00
2/07/24	MJB	(Hafen v. Howell) Correspond with Michael Harris (0.1); Correspond with Jon Hafen (0.1)	.20	85.00
2/07/24	JAB	Draft brief of appellee; Review pleadings	2.40	948.00
2/07/24	CMM	Draft new sections of summary judgement motion; Research bankruptcy rules surrounding adversary proceedings and settlements; Research for prejudgment interest argument; Attorney conference re upcoming mediation; Draft case tracking document; Research deposits and outstanding cases	6.80	2,006.00
2/07/24	LH	Telephone conference with Christopher Lyman re second time returned check and make arrangements to meet up tomorrow to pick up check	.10	23.50
2/08/24	MJB	(Hafen v. Howell) Revise affidavit (0.3); Correspond with Michael Harris (0.2)	.50	212.50
2/08/24	JAB	Draft brief of appellee	1.90	750.50
2/08/24	CMM	Revise Larsen summary judgement per feedback from Parr Brown team; Draft discovery requests for Nelson matter; Attorney conference with Jeffery Balls re appeal	4.10	1,209.50
2/12/24	JAB	Telephone conference with Steven Waterman; Correspond with Jonathan Hafen; Review pleadings	.40	158.00
2/12/24	CMM	Research outstanding cases; Draft default judgement	3.70	1,091.50
2/12/24	LH	Email Jeff Balls re reissuing checks to claimants that haven't received payment; read and respond to email from Randall Lee re receiving payment	.20	47.00
2/13/24	MJB	(Hafen v. Howell) Correspond with Michael Harris (0.1)	.10	42.50
2/13/24	JAB	Draft appellate brief	1.80	711.00
2/14/24	JMC	Correspond with Mike Thomson re Darren Nelson case	.30	138.00
2/14/24	MJB	(Hafen v. Howell) Correspond with Michael Harris (0.3)	.30	127.50
2/14/24	JAB	Draft appellee brief	2.10	829.50
2/14/24	LH	Lengthy conference with Karen Beverley re distribution checks; review claims registry; communicate with Jeff Balls re same; reach out to claimants re returned checks; update addresses on claims registry; prepare mailings for returned checks	.60	141.00
2/15/24	JMC	Correspond with Mike Thomson, Jeff Balls and Claire McGuire re Darren Nelson lawsuit and related issues	1.50	690.00
2/15/24	JAB	Conference with Claire McGuire; Conference with Joseph Covey and Michael Thompson; Draft appellate brief	1.80	711.00
2/15/24	CMM	Attorney conference with Parr Brown team re strategy for Nelson adversary action; Draft discovery requests re the same; Call with trustee re new action and change in opposing counsel	5.10	1,504.50

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Date	Tkpr	Description	Hours	Amount
2/15/24	LH	Email Jeff Balls re status of reissuing checks that were not received by some claimants; read and respond to claimants re distribution; email multiple claimants re new checks mailed; email D'Aron Gonzales re cashed check; conference call with Jeff Balls re next steps	.50	117.50
2/16/24	CMM	Revise motion per feedback from Parr Brown team; Research transactions for fact section	5.60	1,652.00
2/16/24	LH	Communicate with claimant re new check received; document management re same	.10	23.50
2/20/24	CMM	Draft dismissal based on bankruptcy action; Research the same; Track settlement agreements and payments for open case summary	4.80	1,416.00
2/21/24	MJB	(Hafen v. Howell) Correspond with Jon Hafen (0.2)	.20	85.00
2/21/24	JAB	Draft appellate brief	1.30	513.50
2/21/24	CMM	Draft motion for summary judgement; Review court ruling in Larsen matter; Draft summary of the same; Create tracking document for open cases; Review settlement agreements and payments	7.40	2,183.00
2/21/24	RGW	Call with counsel for Oberhansly; Email to Jonathan Hafen re Oberhansly mediation issues	.80	360.00
2/22/24	JMC	Correspond with Jeff Balls and others re settlement of clawback action	.10	46.00
2/22/24	JAB	Conference with Chaunceton Bird re mediation; Review documents for mediation	.40	158.00
2/22/24	CBB	Discuss mediation with Jeff Balls, Jon Hafen, Jeff Shaw, Mark James, Reception, and Practice Assistant; Coordinate room scheduling; Review expert reports from Jeff Shaw and Mark Hashimoto; Prepare for mediation	2.70	891.00
2/23/24	JMC	Correspond with Jeff Shaw, Jeff Balls and others re settlement; confession of judgment and related issues	1.40	644.00
2/23/24	JAB	Review documents for mediation; Attend mediation	7.90	3,120.50
2/23/24	CMM	Revise summary judgement motion; Research issue of intent to decieve in a 727 and amendment to add issues of record keeping; Research open matters	6.60	1,947.00
2/23/24	CBB	Prepare for and participate in mediation of Muir matter	7.90	2,607.00
2/26/24	JAB	Draft appellate brief	1.80	711.00
2/26/24	CMM	Review potential settlement offer and draft analysis for JOH; Research issue of valuation for reasonably equivalent value	3.90	1,150.50
2/27/24	MTH	Review correspondence from Claire McGuire re settlement proposal from the Flints	.10	43.00
2/27/24	MJB	(Hafen v. Howell) Correspond with Michael Harris (0.1)	.10	42.50
2/27/24	JAB	Draft appellate brief; Telephone conference with Jory Trease; Conference with Claire McGuire; Conference with Joseph Covey	3.10	1,224.50
2/27/24	CMM	Draft discovery requests in claw back action; Attorney conference with Jeffery Balls concerning Nelson matter; Call with opposing counsel re change in counsel and potential settlement; Review documents re the same; Draft summary judgement facts for Larsen summary judgement	6.60	1,947.00

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Date	Tkpr	Description	Hours	Amount
2/28/24	JAB	Draft appellate brief; Conference with Joseph Covey; Telephone conference with Chance Thomas; Telephone conference with Rachel Goates	2.10	829.50
2/28/24	CMM	Draft complaint for claw back action; Draft termination of tolling letter for the same; Research and review pending matters and draft task list; Meet with paralegal re new matters and upcoming filings	5.30	1,563.50
2/28/24	CY	Research all rust cases to see what is open and closed; Prepare new spreadsheet of cases; Email correspondence with Claire McGuire re same	5.00	1,000.00
2/29/24	JAB	Draft appellate brief	4.40	1,738.00
2/29/24	CMM	Revise summary judgement motion; Draft summary of open matters; Draft termination of tolling agreement; Research open cases; Draft summary re the same	6.10	1,799.50
3/01/24	MJB	(Hafen v. Howell) Correspond with Michael Harris (0.1)	.10	42.50
3/01/24	CMM	Call with Receiver re settlement offer; Draft response to the same	2.80	826.00
3/04/24	MJB	(Hafen v. Howell) Conference with Jeff Balls (0.1); Correspond with Joe Covey and Walter Peterson (0.2); Correspond with Michael Harris (0.2)	.50	212.50
3/04/24	JAB	Correspond with Jeff Shaw re settlements	.10	39.50
3/04/24	JAB	Draft appellate brief; Conference with Robert Wing	8.30	3,278.50
3/04/24	CMM	Review settlement agreement and communicate re same with investor; Review documents in case set for mediation; Draft discovery request re the same	4.40	1,298.00
3/04/24	RGW	Email to counsel for Oberhansly re discovery	.10	45.00
3/04/24	LH	Reach out to claimants who have not negotiated their checks; Document management re same	.50	117.50
3/05/24	JMC	Correspond with Jeff Balls re Larsen summary judgment motion, deposition of experts and related issues	.50	230.00
3/05/24	JAB	Draft brief of appellee; Conference with Joseph Covey; Correspond with Matthew Barneck; Draft motion to employ Arizona counsel	6.40	2,528.00
3/05/24	CMM	Attorney conference with Robert Wing re claw back action and mediation; Review and send documents re the same	2.90	855.50
3/05/24	LH	Email and calls to claimants re uncashed checks and update claims registry and list for new checks	2.50	587.50
3/06/24	JMC	Correspond with Jeff Balls, Jon Hafen and Claire McGuire re Larsen litigation issues, summary judgment motion and related matters; Correspond with Claire McGuire re status of various clawback matters	2.70	1,242.00
3/06/24	MJB	(Hafen v. Howell) Conference with Jeff Balls (0.1); Review and edit appellate brief (1.1)	1.20	510.00
3/06/24	JAB	Draft brief of appellee; Conference with Joseph Covey and Jonathan Hafen	9.60	3,792.00
3/06/24	CMM	Attorney conference with Joseph Covey re upcoming filing and cases; Review docket for needed filings; Revise motion for summary judgement per feedback; Research need to filing re automatic stay	3.90	1,150.50

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Date	Tkpr	Description	Hours	Amount
3/06/24	LH	Calls and emails with claimants re uncashed checks and questions related to same; Update claims registry	1.60	376.00
3/07/24	JAB	Draft appellate brief; Conference with Robert Wing; Review correspondence from Walter Bugden	7.00	2,765.00
3/07/24	CMM	Review bankruptcy docket main case and adversary; Communicate re change of counsel and need to serve discovery; Draft discovery requests; Communicate with Court re various claw back actions	4.70	1,386.50
3/07/24	RGW	Review revisions to Woodfin settlement; Email with Jonathan Hafen re same; Conference with Jeff Balls re Howell brief; Review Howell brief	2.10	945.00
3/08/24	JAB	Correspond with Joseph Covey; Review restitution of Denise Rust; Finalize motion to employ Sacks Tierney; Review settlement payments; Conference with Claire McGuire; Correspond with Peter Guyon re settlement	1.80	711.00
3/08/24	CMM	Attorney conference re appeal and need for Arizona counsel; Re motion re the same; Research remaining open actions; Draft timelines and due dates re the same	3.40	1,003.00
3/08/24	RGW	Email to opposing counsel re Woodfin settlement	.10	45.00
3/08/24	LH	Email Jeff Balls re list of claimants needing new checks; Document management	.50	117.50
3/11/24	JAB	Correspond with Peter Guyon	.50	197.50
3/11/24	RGW	Analyze issue re Woodfin settlement	.10	45.00
3/12/24	MJB	(Hafen v. Howell) Correspond with Michael Harris (0.1)	.10	42.50
3/12/24	CMM	Revise summary judgment motion for Larsen case; Review expert report and draft new section for facts	4.50	1,327.50
3/13/24	JAB	Conference with Robert Wing; Correspond with Blake Faulkner	.90	355.50
3/13/24	CMM	Revise summary judgement for Larsen case; Attorney conference with Robert Wing re Oberhansley case and Guyon case; Review initial disclosure documents for the same; Communicate with court re upcoming matters	7.80	2,301.00
3/13/24	CY	Prepare exhibits and hyperlink cases (Larsen case)	2.10	420.00
3/13/24	RGW	Review answer and related documents; Email to opposing counsel re discovery issues; Research re asset issue; Conference with Claire McGuire re discovery; Conference with Jonathan Hafen re status	2.50	1,125.00
3/14/24	CMM	Attorney conference with Robert Wing re Oberhansley discovery and mediation; Review claim forms and produced documents; Communicate the same to Robert Wing	1.60	472.00
3/14/24	RGW	Review initial disclosures and claim form in Oberhansly in preparation for deposition	1.50	675.00
3/14/24	LH	Call and email claimants re uncashed checks and update claims registry re same; Research re Robert Berlin contact information and contact relatives re checks; Mail checks to Berlin family	1.60	376.00
3/15/24	JAB	Revise summary judgment motion	2.50	987.50

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3/15/24	CMM	Revise summary judgement motion; Attorney conference with Parr Brown team re expert reports and totals for claw back action; Communicate with Receiver re approval for motion and settlement approach; Review and prepare exhibits for the same; Review deposits against settlement recovery tracker	5.80	1,711.00
3/15/24	CY	Draft appendix of evidence for motion for summary judgment and certificate of service (Larsen)	.60	120.00
3/15/24	LH	Emails and calls with claimants re distribution and update claims registry re new contact information, etc.	1.50	352.50
3/18/24	JAB	Review court orders; Review litigations matters	2.30	908.50
3/18/24	CMM	Communicate with Robert Wing re expert analysis from BRG of statements re claw back defendant account; Review the same	1.90	560.50
3/18/24	RGW	Review documents in Oberhansly matter re discovery	2.10	945.00
3/19/24	JAB	Review summary judgment motion; Conference with Claire McGuire	1.10	434.50
3/19/24	CMM	Review and revise summary judgement motion per comments from Jeffery Balls; Attorney conference with Jeffery Balls re remaining expert questions; Communicate with expert Jeff Shaw re the same	2.10	619.50
3/19/24	LH	Communicate with claimants re new checks; Emails to Jeff Balls re same	.80	188.00
3/20/24	JMC	Review and revise Larsen summary judgment motion; Correspond with Jeff Balls, Jon Hafen and Claire McGuire re the same	1.30	598.00
3/20/24	JAB	Conference with Joseph Covey	1.80	711.00
3/20/24	CMM	Conference with Jeffery Balls and Jeff Shaw re factual issues in summary judgement motion; Communicate with Receiver re the same	2.70	796.50
3/20/24	CMM	Revise complaint for new claw back action; Review tracking for open cases and settlement negotiations; Communicate with lead attorneys re the same	2.30	678.50
3/20/24	LH	Update registry re new mailing address and update list for replacement check	.20	47.00
3/21/24	JAB	Correspond with Dominic Shaw re status	.30	118.50
3/21/24	CMM	Attorney conference with Jeffery Balls and Jeff Shaw re issues for summary judgement; Communicate with Receiver re the same	1.30	383.50
3/22/24	CMM	Revise discovery requests; Review documents produced with initial disclosures and pull relevant documents for deposition; Communicate with potential claw back defendant re settlement offer; Communicate with expert in Larsen matter re final draft of summary judgement and supplemental declaration in the same	4.80	1,416.00
3/22/24	LH	Telephone conferences with claimants re new checks; Meeting with Jeff Balls re same	.40	94.00
3/23/24	JAB	Review discovery responses of Larsen; Draft joint status report for Muir; Correspond with Chaunceton Bird	.80	316.00
3/25/24	JMC	Correspond with Jeff Balls, Jon Hafen and Claire McGuire re summary judgment motion	.40	184.00

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Date	Tkpr	Description	Hours	Amount
3/25/24	JAB	Conference with Joseph Covey, Jonathan Hafen, and Claire McGuire; Revise motion for summary judgment against Larsen; Correspond with Ryan Pahnke; Draft motion for amended scheduling order	2.80	1,106.00
3/25/24	CMM	Review court order re status conference; Communicate with Court re bankruptcy; Attorney conference internally re Nelson claw back	1.10	324.50
3/25/24	LH	Review emails and voicemails from claimants; Conference calls with claimants; Email Jeff Balls re request from claimants re reissuing checks	.50	117.50
3/26/24	JMC	Correspond with Claire McGuire re pretrial conference and bankruptcy of Darren Nelson	.20	92.00
3/26/24	MTH	Review correspondence from Claire McGuire and Joe Covey re Nelson case	.10	43.00
3/26/24	JAB	Revise summary judgment motion for Larsen; Finalize motion to amend scheduling order	.90	355.50
3/26/24	CMM	Attorney conference re discovery issues and meet and confer letter; Draft letter re discovery issues; Revise settlement offer and agreement per communication with opposing party; Review bankruptcy rules for adversary proceeding; Research issue of settlement in the case of requested set aside	5.40	1,593.00
3/26/24	LH	Telephone conferences and emails with claimants re reissued checks; Telephone conference with and email to Jeff Balls re same	.50	117.50
3/27/24	JMC	Correspond with Jeff Balls re summary judgment and related issues	.10	46.00
3/27/24	JAB	Review litigation status; Telephone conference with Josh Lee; Draft notice of dismissal	3.00	1,185.00
3/27/24	CMM	Revise summary judgement motion	.90	265.50
3/27/24	CMM	Revise citations and bluebook summary judgement motion	1.30	383.50
3/27/24	CBB	In Muir matter, correspond with opposing counsel and Jeff Balls re court's required joint status report and case dismissal	.30	99.00
3/27/24	LH	Communicate with claimants re canceling and reissuing checks; Document management re same	.30	70.50
3/28/24	MTH	Review information from court re hearings on Nelson matter	.10	43.00
3/28/24	JAB	Review motion for summary judgment; Conference with Joseph Covey; Conference with Claire McGuire	1.40	553.00
3/28/24	CMM	Revise and finalize Larsen summary judgement motion; Finalize exhibits for the same	2.80	826.00
3/28/24	LH	Email Jeff Balls re canceling check and reissuing to Etzels; Email to Etzels re same	.20	47.00
3/29/24	MTH	Review correspondence from James Tracy and correspond with legal team re same	.10	43.00
3/29/24	MTH	Review and respond to correspondence from Claire McGuire and Jeff Balls re Larsen matter and mediation	.10	43.00
3/29/24	JAB	Review correspondence from James Tracy; Conference with Claire McGuire; Review motion to amend scheduling order	1.10	434.50

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Date	Tkpr	Description	Hours	Amount
3/29/24	CMM	Call with opposing counsel re extension of deadline for filing summary judgement motions and opposition to our summary judgement; Call with Jeffery Balls re the same; Review stipulation sent by opposing counsel; Draft settlement offer response	3.60	1,062.00

TOTAL PROFESSIONAL SERVICES \$ 146,568.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	460.00	18.80	8,648.00
Rodger M Burge	435.00	.90	391.50
Michael T Hoppe	430.00	8.10	3,483.00
Matthew J Ball	425.00	4.90	2,082.50
Jeffery A Balls	395.00	104.90	41,435.50
Chaunceton B Bird	330.00	18.30	6,039.00
Claire M McGuire	295.00	230.50	67,997.50
Tammy M Frisby	280.00	1.70	476.00
Thomas M Melton	450.00	.50	225.00
Robert G Wing	450.00	20.70	9,315.00
Lori Henry - Paralegal	235.00	21.00	4,935.00
Crista Yancey - Paralegal	200.00	7.70	1,540.00
TOTALS		438.00	\$ 146,568.00

COSTS ADVANCED

Date	Description	Amount
1/18/24	Gourmandise - mediation lunch	53.40
1/26/24	First American Corporation - Special Reports	950.00
3/14/24	PACER Electronic Court Records	8.80
3/14/24	FedEx - Nina R. Berlin	43.43
3/18/24	PACER Electronic Court Records	1.40
3/18/24	SimpleCertified Mail	12.88
3/25/24	James Dodge Russell & Stephens - Mark Obrhansly Mediation	3,080.00

TOTAL COSTS ADVANCED \$ 4,149.91

TOTAL THIS INVOICE \$ 150,717.91

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

Rust Rare Coin Receivership

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REMITTANCE ADVICE

RE: Asset Analysis & Recovery

BALANCE DUE THIS INVOICE \$ 150,717.91

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

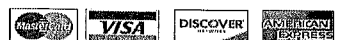
Routing #: 124001545
Account #: 912454114

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

Please reference your invoice # 943970

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

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



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

Rust Rare Coin Receivership

May 14, 2024

Invoice: 943971
Client: 176430
Matter: 3

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Disposition of Assets

Professional Services	\$ 552.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 552.00

PARR BROWN GEE & LOVELESS

Invoice: 943971
 Rust Rare Coin Receivership
 Disposition of Assets

May 14, 2024
 Client: 176430
 Matter: 3

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
2/06/24	JMC	Correspond with Mike Hoppe re sale of Josh Rust items	.10	46.00
2/07/24	JMC	Correspond with claimant re claim payment and related issues; Correspond with Jeff Balls re the same; Review claim payment and claim forms	.60	276.00
2/28/24	JMC	Correspond with Jeff Balls, Rachel Goates and Chance Thomas re music master recordings and related issues	.50	230.00

TOTAL PROFESSIONAL SERVICES **\$ 552.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	460.00	1.20	552.00
TOTALS		1.20	\$ 552.00

TOTAL THIS INVOICE **\$ 552.00**

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

Rust Rare Coin Receivership

May 14, 2024

Invoice: 943971
Client: 176430
Matter: 3

REMITTANCE ADVICE

RE: Disposition of Assets

BALANCE DUE THIS INVOICE \$ 552.00

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

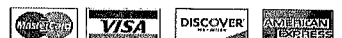
Routing #: 124001545
Account #: 912454114

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

Please reference your invoice # 943971

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

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



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

Rust Rare Coin Receivership

May 14, 2024

Invoice: 943972
Client: 176430
Matter: 5

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Claims Administration

Professional Services	\$ 39,599.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 39,599.00



PARR BROWN GEE & LOVELESS

Invoice: 943972
 Rust Rare Coin Receivership
 Claims Administration

May 14, 2024
 Client: 176430
 Matter: 5

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/02/24	JAB	Review checks; Correspond with Jeff Shaw; Correspond with claimants; Telephone conference with Jeff Shaw	3.90	1,540.50
1/03/24	JAB	Correspond with claimants; Review checks; Conference with Jeff Shaw; Correspond with Jason Bouzos	6.20	2,449.00
1/04/24	JMC	Correspond with Jeff Balls re claims payments and related issues	.60	276.00
1/04/24	JAB	Review checks; Correspond with Jason Bouzos; Telephone conference with Jeff Shaw; Telephone conference with claimants	3.60	1,422.00
1/05/24	JAB	Review checks; Correspond with Jason Bouzos; Correspond with Jonathan Hafen; Telephone conference with Jeff Shaw; Telephone conference with claimants	1.80	711.00
1/08/24	JMC	Correspond with Jeff Balls re distribution on coins	.40	184.00
1/08/24	JAB	Correspond with claimants; Conference with Joseph Covey	1.00	395.00
1/08/24	CMM	Review communications with firm buying claimants claims; Attorney conference with Jeffery Balls re the same; Call with claimant re distributions	.60	177.00
1/09/24	JAB	Correspond with claimants; Correspond with Jason Bouzos; Draft website notice	2.20	869.00
1/10/24	JAB	Review bank records; Correspond with claimants; Telephone conference with claimants	2.20	869.00
1/11/24	JAB	Correspond with Jeff Shaw; Correspond with claimants; Telephone conference with Jeff Shaw	3.20	1,264.00
1/11/24	CMM	Communicate with claimant re distributions; Review claims registry re the same	.70	206.50
1/12/24	JAB	Telephone conference with claimants; Correspond with claimants; Telephone conference with Jeff Shaw	2.40	948.00
1/15/24	JAB	Correspond with claimants	3.60	1,422.00
1/16/24	JMC	Review and revise notice to claimants; Correspond with Jeff Balls and Jon Hafen re the same; Correspond with Jeff Balls re various claims issues	1.50	690.00
1/16/24	JAB	Correspond with claimants; Draft notice of distribution; Correspond with Jeff Shaw	2.90	1,145.50
1/17/24	JMC	Correspond with Jeff Balls re claims issues	.20	92.00
1/17/24	JAB	Correspond with claimants; Telephone conference with claimants; Conference with Lori Henry re matter	5.30	2,093.50
1/18/24	JAB	Correspond with claimants; Review bank records	2.20	869.00
1/19/24	JAB	Telephone conference with Jeff Shaw; Correspond with claimants	1.20	474.00
1/20/24	JAB	Correspond with claimants; Correspond with Paul Mulholland	.20	79.00
1/22/24	JAB	Review correspondence from claimants	.10	39.50
1/23/24	JAB	Review correspondence from claimants	.10	39.50

PARR BROWN GEE & LOVELESS

Invoice: 943972
 Rust Rare Coin Receivership
 Claims Administration

May 14, 2024
 Client: 176430
 Matter: 5

Date	Tkpr	Description	Hours	Amount
1/23/24	JAB	Telephone conference with Jeff Shaw; Review correspondence from claimants; Conference with Lori Henry; Coordinate payment of fees to Strategic Claims	2.10	829.50
1/24/24	JMC	Correspond with Jon Hafen re claims distribution notice	.20	92.00
1/24/24	JAB	Telephone conference with Jeff Shaw; Correspond with claimants	2.00	790.00
1/25/24	JAB	Correspond with claimants; Review documents from Utah Department of Workforce Services; Correspond with Jeff Shaw re same	2.80	1,106.00
1/25/24	CMM	Research claim re response determination; Attorney conference with Jeffery Balls re the same; Review communications with claimants re responses to registry determination; Review communications with claimants related to third party purchaser	2.80	826.00
1/26/24	JAB	Review correspondence from claimants	.90	355.50
1/29/24	JAB	Correspond with claimants; Review bank account	4.30	1,698.50
1/30/24	JAB	Review claims; Correspond with claimants; Conference with Jeff Shaw; Review bank records	1.80	711.00
1/31/24	JAB	Review correspondence from claimants; Arrange issuance of checks	1.00	395.00
2/01/24	JAB	Correspond with claimants; Review bank records; Conference with Lori Henry	1.70	671.50
2/02/24	JAB	Correspond with claimants; Reissue checks	2.20	869.00
2/05/24	JAB	Review correspondence from claimants; Conference with Claire McGuire	2.70	1,066.50
2/06/24	JAB	Telephone conference with claimant	.30	118.50
2/06/24	CMM	Communicate with claimant re incorrect name of Trust on claim form and need for reissuance of checks; Review claim for the same	.60	177.00
2/07/24	JAB	Telephone conference with claimants; Conference with Joseph Covey; Correspond with claimants	.60	237.00
2/08/24	JAB	Conference with claimants; Review bank account statements	.70	276.50
2/08/24	CMM	Communicate with claimant re new checks issued to Trust; Review and file Trust documents; Communicate with Jeffery Balls re the same	.80	236.00
2/12/24	JAB	Review claims; Conference with Lori Henry re checks; Coordinate execution of new checks; Telephone conference with claimants	1.10	434.50
2/12/24	CMM	Meet with claimant who came in with questions; Attorney conference with Jeffery Balls re the same; Follow up call with claimant	.60	177.00
2/13/24	JAB	Review correspondence from bank	.30	118.50
2/14/24	JAB	Telephone conference with claimants	1.60	632.00
2/15/24	JAB	Telephone conference with claimants; Conference with Lori Henry; Review bank records	1.10	434.50
2/15/24	AWF	Conference with Jeff Balls re Milton Barlow trust; Review the same	.80	284.00
2/20/24	JAB	Conference with claimants; Review bank account	1.70	671.50
2/21/24	JAB	Telephone conference with claimant; Conference with Abbey Farnsworth	1.50	592.50
2/22/24	JAB	Telephone conference with claimants; Review invoices; Review bank account; Conference with Jon Hafen; Conference with Wayne Klein	2.90	1,145.50
2/22/24	CMM	Communicate with claimant re distributions	.40	118.00

PARR BROWN GEE & LOVELESS

Invoice: 943972
 Rust Rare Coin Receivership
 Claims Administration

May 14, 2024
 Client: 176430
 Matter: 5

Date	Tkpr	Description	Hours	Amount
2/26/24	JAB	Review checks; Coordinate issuing checks; Correspond with claimants; Telephone conference with Steven Waterman	1.20	474.00
2/28/24	JAB	Correspond with claimants; Review bank account statements; Correspond with Lori henry re checks	1.50	592.50
2/29/24	JAB	Telephone conference with claimant	.10	39.50
3/05/24	JAB	Telephone conference with claimants; Conference with Lori Henry; Review bank records; Review list of checks not negotiated	.50	197.50
3/06/24	JAB	Telephone conference with claimant	.10	39.50
3/08/24	JAB	Correspond with Metropolitan bank re stop payments; Review bank records	1.80	711.00
3/11/24	JAB	Review bank account; Conference with Lori Henry; Telephone conference with claimants	1.90	750.50
3/12/24	JAB	Telephone conference with claimants; Review bank records	.50	197.50
3/13/24	JAB	Review bank records; Coordinate checks	.30	118.50
3/14/24	JAB	Telephone conference with claimants; Conference with Jeff Shaw	1.60	632.00
3/15/24	JAB	Correspond with claimants	.70	276.50
3/18/24	JAB	Review bank account; Coordinate checks to claimants; Correspond with Kathy Bates	.80	316.00
3/19/24	JAB	Telephone conference with claimants	.20	79.00
3/21/24	JAB	Review correspondence; Review bank account	.90	355.50
3/22/24	JAB	Conference with Lori Henry; Review bank account	.30	118.50
3/25/24	JAB	Telephone conference with claimants; Review uncashed checks	1.10	434.50
3/26/24	JAB	Conference with Lori Henry; Review correspondence from claimants	.90	355.50
3/27/24	JAB	Correspond with claimants	.90	355.50
3/29/24	JAB	Correspond with claimants; Review bank information	.60	237.00

TOTAL PROFESSIONAL SERVICES \$ 39,599.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	460.00	2.90	1,334.00
Jeffery A Balls	395.00	91.30	36,063.50
Abbey W Farnsworth	355.00	.80	284.00
Claire M McGuire	295.00	6.50	1,917.50
TOTALS		101.50	\$ 39,599.00

TOTAL THIS INVOICE \$ 39,599.00

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

Rust Rare Coin Receivership

May 14, 2024

Invoice: 943972
Client: 176430
Matter: 5

REMITTANCE ADVICE

RE: Claims Administration

BALANCE DUE THIS INVOICE \$ 39,599.00

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 # 943972

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Payments accepted by phone (801) 532-7840
Payable Upon Receipt

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EXHIBIT C

EXHIBIT C

TWENTY-FIRST INTERIM FEE APPLICATION

Time Records of BRG

EXHIBIT C



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

April 29, 2024
Client-Matter: 16222-25457
Invoice #: 174138
Tax ID # 27-1451273

Via Email: jhafen@parrbrown.com

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

Services Rendered From January 1, 2024 Through March 31, 2024

Professional Services	\$ 51,654.50	USD
Voluntary Reduction	(3,211.50)	
Expenses Incurred	25.37	
CURRENT CHARGES	\$ 48,468.37	USD

PAYMENT IS DUE BY May 29, 2024

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

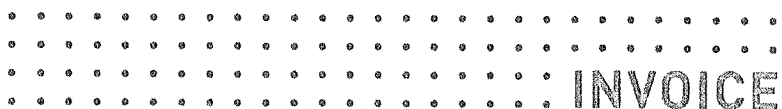
Please remit wire/ACH payment to:

Bank Name: PNC BANK, N.A.
SWIFT: PNCCUS33
ABA #: 031207607
Account Name: BERKELEY RESEARCH GROUP, LLC
Account #: 8026286672
Reference: 174138

Please remit check payment to:
BERKELEY RESEARCH GROUP, LLC
PO BOX 676158
DALLAS, TX 75267-6158

Please remit express/overnight payment to:
PNC BANK C/O BERKELEY RESEARCH GROUP, LLC
LOCKBOX NUMBER 676158
1200 E CAMPBELL RD, STE 108
RICHARDSON, TX 75081

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



INVOICE

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

Page 2 of 10
 Invoice # 174138
 Client-Matter: 16222-025457

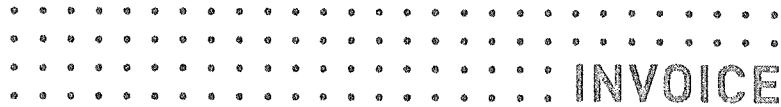
Services Rendered From January 1, 2024 Through March 31, 2024

PROFESSIONAL SERVICES

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Managing Director			
Ray Strong	415.00	1.50	622.50
Ray Strong	0.00	0.60	N/C
Associate Director			
Leif Larsen	375.00	9.20	3,450.00
Jeffrey Shaw	375.00	115.00	43,125.00
Jeffrey Shaw	0.00	7.90	N/C
Jared Funk	370.00	0.90	333.00
Associate			
Spencer Rawlings	125.00	5.40	675.00
Case Assistant			
Shealee Calder	125.00	1.90	237.50
Total Professional Services		142.40	48,443.00

EXPENSES

Postage		6.51
Supplies		18.86
Total Expenses		25.37

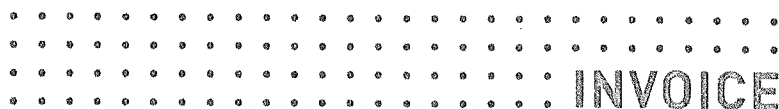


To: Jonathan O. Hafen
c/o: Parr Brown Gee & Loveless
RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

Page 3 of 10
Invoice # 174138
Client-Matter: 16222-025457

SUMMARY BY TASK CODE

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
110	General Accounting and Operational Issues	2.90	1,087.50
300	Claims Process / Distribution	74.70	28,008.00
350	Net Winner / Claims Analysis	7.10	2,662.50
500	Recovery Litigation	32.50	12,247.50
600	Tax Compliance & Analysis	16.70	4,437.50
950	Fee Application Preparation & Hearing	8.50	0.00
Total Professional Services		142.40	48,443.00



INVOICE

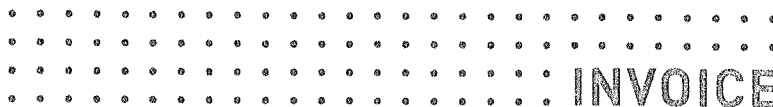
To: Jonathan O. Hafen
 c/o: Parr Brown Gee & Loveless
 RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

Page 4 of 10
 Invoice # 174138
 Client-Matter: 16222-025457

Services Rendered From January 1, 2024 Through March 31, 2024

DETAIL OF PROFESSIONAL SERVICES

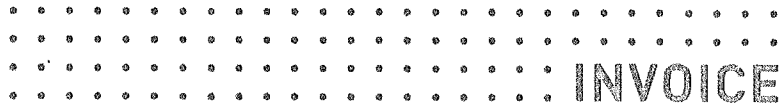
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 110 - General Accounting and Operational Issues					
01/09/24	Jeffrey Shaw	Reviewed form 2 transactions and data.	1.30	375.00	487.50
01/10/24	Jeffrey Shaw	Reviewed form 2 data and email to counsel regarding Receivership funds.	0.70	375.00	262.50
01/17/24	Jeffrey Shaw	Reviewed Trust Works reports to determine check status.	0.90	375.00	337.50
Total for Task Code 110			2.90		1,087.50
Task Code: 300 - Claims Process / Distribution					
01/02/24	Jeffrey Shaw	Reviewed and verified Stretto checks in connection with distribution.	5.40	375.00	2,025.00
01/02/24	Jeffrey Shaw	Follow-up regarding case issues and status.	0.50	375.00	187.50
01/02/24	Jeffrey Shaw	Reviewed and updated distribution lists.	0.40	375.00	150.00
01/02/24	Jeffrey Shaw	Call with counsel regarding distribution issues.	0.30	375.00	112.50
01/03/24	Jeffrey Shaw	Reviewed and verified Stretto checks in connection with distribution.	6.10	375.00	2,287.50
01/03/24	Jeffrey Shaw	Reviewed and updated distribution lists and data.	1.50	375.00	562.50
01/03/24	Jeffrey Shaw	Call with counsel regarding distribution issues.	0.10	375.00	37.50
01/04/24	Jeffrey Shaw	Emails regarding issues and status of distribution checks.	0.50	375.00	187.50
01/04/24	Jeffrey Shaw	Call with counsel regarding distribution issues.	0.30	375.00	112.50
01/04/24	Jeffrey Shaw	Reviewed revised distribution checks.	2.10	375.00	787.50
01/04/24	Jeffrey Shaw	Reviewed and updated distribution lists and data.	2.10	375.00	787.50
01/04/24	Jeffrey Shaw	Updated wage claim payroll stubs and submitted to counsel.	1.20	375.00	450.00



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

Page 5 of 10
 Invoice # 174138
 Client-Matter: 16222-025457

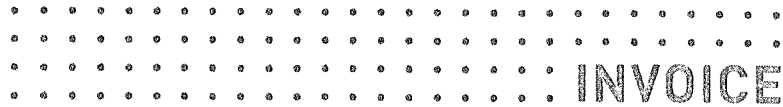
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/04/24	Jeffrey Shaw	Call with tax professionals regarding tax issues in connection with distribution.	0.80	375.00	300.00
01/04/24	Jeffrey Shaw	Prepared wage claims schedule in connection with distribution.	0.50	375.00	187.50
01/05/24	Jeffrey Shaw	Reviewed and updated distribution lists and data.	3.30	375.00	1,237.50
01/05/24	Jeffrey Shaw	Follow-up with staff regarding payroll tax/wage claim issues in connection with distribution.	0.20	375.00	75.00
01/05/24	Jeffrey Shaw	Call with counsel regarding distribution issues.	0.10	375.00	37.50
01/09/24	Jeffrey Shaw	Reviewed plan of distribution and emails regarding the same.	1.20	375.00	450.00
01/09/24	Jeffrey Shaw	Reviewed and updated distribution lists and data.	0.50	375.00	187.50
01/10/24	Jeffrey Shaw	Reviewed and updated distribution schedules with payment data.	3.80	375.00	1,425.00
01/10/24	Jeffrey Shaw	Reviewed and confirmed distribution update to be posted by Receiver and email regarding the same.	0.70	375.00	262.50
01/11/24	Jeffrey Shaw	Discussion with counsel regarding distribution issues.	0.60	375.00	225.00
01/11/24	Jeffrey Shaw	Review and emails with counsel regarding distribution issues.	0.60	375.00	225.00
01/11/24	Jeffrey Shaw	Reviewed, verified and updated distribution schedules with payment data.	4.50	375.00	1,687.50
01/12/24	Jeffrey Shaw	Discussion with counsel regarding distribution issues.	0.30	375.00	112.50
01/16/24	Jeffrey Shaw	Evaluated and reviewed Receiver notice and prepared and submitted revisions.	2.10	375.00	787.50
01/16/24	Jeffrey Shaw	Reviewed, verified and updated distribution schedules with payment data.	3.60	375.00	1,350.00
01/17/24	Jeffrey Shaw	Analyzed distribution scenarios per counsel request.	0.60	375.00	225.00



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

Page 6 of 10
 Invoice # 174138
 Client-Matter: 16222-025457

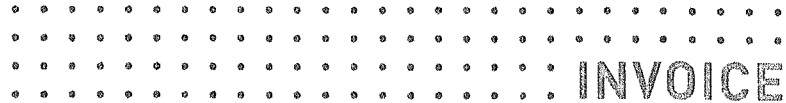
<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/17/24	Jeffrey Shaw	Emails and follow-up with counsel regarding distribution issues.	0.30	375.00	112.50
01/17/24	Jeffrey Shaw	Reviewed, verified and updated distribution schedules with payment data.	1.90	375.00	712.50
01/18/24	Jeffrey Shaw	Analyzed and prepared distribution scenarios per counsel request.	5.90	375.00	2,212.50
01/19/24	Jeffrey Shaw	Call with counsel regarding distribution.	0.60	375.00	225.00
01/19/24	Jeffrey Shaw	Analyzed and prepared distribution scenarios per counsel request.	5.80	375.00	2,175.00
01/22/24	Jared Funk	Reviewed distribution model.	0.90	370.00	333.00
01/22/24	Jeffrey Shaw	Analyzed and prepared distribution scenarios per counsel request.	4.50	375.00	1,687.50
01/23/24	Jeffrey Shaw	Call with counsel regarding claims distribution issues.	0.20	375.00	75.00
01/23/24	Jeffrey Shaw	Evaluated tax issues in connection with distribution.	0.90	375.00	337.50
01/23/24	Jeffrey Shaw	Analyzed and prepared distribution scenarios per counsel request.	1.70	375.00	637.50
01/24/24	Jeffrey Shaw	Call with counsel regarding distribution issues.	0.80	375.00	300.00
01/24/24	Jeffrey Shaw	Evaluated distribution issues.	1.50	375.00	562.50
01/24/24	Jeffrey Shaw	Prepared distribution model file per counsel request.	0.90	375.00	337.50
01/26/24	Jeffrey Shaw	Reviewed distribution check status and updated schedules.	1.50	375.00	562.50
01/29/24	Jeffrey Shaw	Evaluated distribution issues.	0.30	375.00	112.50
02/28/24	Jeffrey Shaw	Reviewed check status and updated distribution schedule.	1.40	375.00	525.00
02/28/24	Jeffrey Shaw	Follow-up regarding status of distribution checks.	0.20	375.00	75.00
02/29/24	Jeffrey Shaw	Reviewed check status and updated distribution schedule.	1.50	375.00	562.50
Total for Task Code 300			74.70		28,008.00



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

Page 7 of 10
 Invoice # 174138
 Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 350 - Net Winner / Claims Analysis					
01/12/24	Jeffrey Shaw	Reviewed investment activity and updated distribution schedules and disbursement data per discussion from counsel.	2.50	375.00	937.50
01/30/24	Jeffrey Shaw	Analyzed Wells investment activity pursuant to counsel inquiry.	3.40	375.00	1,275.00
03/04/24	Jeffrey Shaw	Reviewed settlement agreements.	0.80	375.00	300.00
03/11/24	Jeffrey Shaw	Analyzed investor settlements.	0.40	375.00	150.00
Total for Task Code 350			7.10		2,662.50
Task Code: 500 - Recovery Litigation					
01/09/24	Jeffrey Shaw	Follow-up regarding litigation status.	0.30	375.00	112.50
01/16/24	Jeffrey Shaw	Emails regarding litigation issues.	0.30	375.00	112.50
01/23/24	Jeffrey Shaw	Reviewed opposing expert report in Muir litigation.	3.50	375.00	1,312.50
01/25/24	Jeffrey Shaw	Reviewed Muir activity and support and opposing expert report.	4.10	375.00	1,537.50
01/26/24	Jeffrey Shaw	Reviewed investment activity and opposing expert report for Muir.	3.10	375.00	1,162.50
01/29/24	Jeffrey Shaw	Discussion with counsel regarding Muir litigation.	0.60	375.00	225.00
01/29/24	Jeffrey Shaw	Reviewed Muir activity and support and opposing expert report.	1.90	375.00	712.50
02/09/24	Jeffrey Shaw	Follow-up regarding litigation status.	0.20	375.00	75.00
02/23/24	Jeffrey Shaw	Attended Muir mediation.	7.50	375.00	2,812.50
02/23/24	Jeffrey Shaw	Prepared for Muir mediation.	1.50	375.00	562.50
02/23/24	Ray Strong	Evaluated status of ongoing recovery litigation.	0.20	415.00	83.00
02/29/24	Jeffrey Shaw	Follow-up regarding clawback status and settlements.	0.30	375.00	112.50
02/29/24	Jeffrey Shaw	Reviewed clawback settlement issues and status.	1.10	375.00	412.50
03/01/24	Jeffrey Shaw	Reviewed Howell appeal.	0.70	375.00	262.50
03/07/24	Ray Strong	Discussed case status issues with Receiver's counsel.	0.30	415.00	124.50



INVOICE

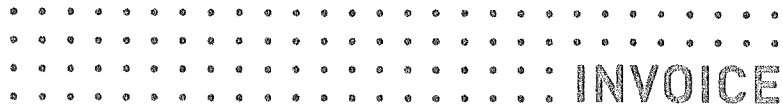
To: Jonathan O. Hafen
 c/o: Parr Brown Gee & Loveless
 RE: Financial Advisors to the Receiver of Rust Rare Coin, Inc.

Page 8 of 10
 Invoice # 174138
 Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
03/12/24	Ray Strong	Analyzed upcoming expert report requirements based on scheduling orders sent by Counsel.	0.60	415.00	249.00
03/20/24	Jeffrey Shaw	Call with counsel regarding Larsen litigation issues.	0.90	375.00	337.50
03/20/24	Jeffrey Shaw	Analyzed Larsen transactions data and support in preparation for call with counsel.	1.80	375.00	675.00
03/22/24	Jeffrey Shaw	Reviewed initial draft of Larsen Summary Judgment Motion.	0.50	375.00	187.50
03/26/24	Jeffrey Shaw	Reviewed Howell Appeal.	2.50	375.00	937.50
03/27/24	Ray Strong	Evaluated ongoing recovery litigation to determine status/assignments.	0.40	415.00	166.00
03/28/24	Jeffrey Shaw	Follow-up regarding litigation status/issues.	0.20	375.00	75.00
Total for Task Code 500			32.50		12,247.50

Task Code: 600 - Tax Compliance & Analysis

01/08/24	Leif Larsen	Followed up on information needed in order to prepare 2023 information returns for the receivership.	0.20	375.00	75.00
01/11/24	Leif Larsen	Followed up on information needed in order to secure payroll accounts with the state of Utah.	0.60	375.00	225.00
01/12/24	Leif Larsen	Followed up on information needed in order to secure payroll accounts with the state of Utah.	0.60	375.00	225.00
01/12/24	Spencer Rawlings	Created and submitted state payroll tax withholding account application for Rust Receivership.	1.20	125.00	150.00
01/17/24	Shealee Calder	Analyzed 2023 transactions to identify 1099s and prepared 1099s.	0.60	125.00	75.00
01/18/24	Leif Larsen	Reviewed 2023 1099 information returns and corresponding schedules for completeness and accuracy.	1.10	375.00	412.50
01/18/24	Spencer Rawlings	Completed and Submitted SUTA tax rate application for Receivership.	1.60	125.00	200.00
01/24/24	Shealee Calder	Cleared review notes for 2023 1099s and 1096.	1.10	125.00	137.50



INVOICE

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

Page 9 of 10
Invoice # 174138
Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/25/24	Spencer Rawlings	Responded to request for more information of Receivership SUTA application.	2.20	125.00	275.00
01/26/24	Spencer Rawlings	Responded to request for more information of Receivership SUTA application.	0.40	125.00	50.00
01/30/24	Shealee Calder	Prepared and mailed 2023 1099s.	0.10	125.00	12.50
01/31/24	Shealee Calder	Prepared and mailed 2023 1099s.	0.10	125.00	12.50
01/31/24	Leif Larsen	Performed final review of 2023 information returns and prepared them for submission to the proper taxing authorities.	0.50	375.00	187.50
02/26/24	Jeffrey Shaw	Evaluated tax issues.	0.20	375.00	75.00
03/15/24	Leif Larsen	Prepared the 2023 Form 7004 for the receivership and submitted to the IRS.	0.50	375.00	187.50
03/29/24	Leif Larsen	Analyzed cash receipts and disbursements ledgers for the period of July 1, 2023 through December 31, 2023 in order to identify taxable receipts, deductible expenditures and other reportable activity for the 2023 receivership income tax returns.	2.80	375.00	1,050.00
03/29/24	Leif Larsen	Analyzed cash receipts and disbursements ledgers for the period of January 1, 2023 through June 30, 2023 in order to identify taxable receipts, deductible expenditures and other reportable activity for the 2023 receivership income tax returns.	2.90	375.00	1,087.50
Total for Task Code 600			16.70		4,437.50

Task Code: 950 - Fee Application Preparation & Hearing

02/28/24	Jeffrey Shaw	Reviewed and revised time entries and descriptions for Q4 fee application.	1.70	0.00	N/C
02/29/24	Jeffrey Shaw	Reviewed and revised Q4 invoice.	1.30	0.00	N/C
02/29/24	Jeffrey Shaw	Reviewed and revised time entries and descriptions for Q4 fee application.	1.90	0.00	N/C
02/29/24	Jeffrey Shaw	Finalized and submitted Q4 invoice.	0.40	0.00	N/C
02/29/24	Ray Strong	Attended call with BRG regarding finalizing fee application.	0.30	0.00	N/C



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

Page 10 of 10
 Invoice # 174138
 Client-Matter: 16222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
02/29/24	Ray Strong	Analyzed time entries for preparation of fee application.	0.30	0.00	N/C
03/04/24	Jeffrey Shaw	Reviewed time descriptions and prepared fee application narrative.	2.10	0.00	N/C
03/04/24	Jeffrey Shaw	Reviewed, finalized and submitted fee application narrative.	0.30	0.00	N/C
03/04/24	Jeffrey Shaw	Emails regarding fee application issues.	0.20	0.00	N/C
Total for Task Code 950			8.50		0.00
Professional Services			142.40		48,443.00

DETAIL OF EXPENSES

<u>Date</u>	<u>Description</u>	<u>Amount</u>
Postage		
02/29/24	BRG Misc Clearing - BRG Misc Clearing 02/29/2024 Rust Rare Coins Invoice #: 022624 Vchr Comment: Salt Lake City Postage Chargeback Jan and Feb 2024 Timekeeper : 09999 - Applicable, Not	6.51
Total For Postage		6.51
Supplies		
03/08/24	Calder, Kellee - Payment of Expenses Office Supplies on 2024-01-29. Line Number 3. 1099 forms . . Expense Rept# 0100-6445-8959	18.86
Total For Supplies		18.86
Expenses		25.37

EXHIBIT D

EXHIBIT D

TWENTY-FIRST INTERIM FEE APPLICATION

Time Records of Arizona Counsel

EXHIBIT D

SacksTierney P.A.

ATTORNEYS

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

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

Attention: Matthew J. Ball

February 02, 2024
 Client: PA123
 Matter: 00007
 Invoice #: 1301767

Page: 1

RE: Jonathan Hafen v. Leslie & Gretchen Howell

For Professional Services Rendered Through January 31, 2024

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
01/01/2024	MTR	Emails with Michael Harris regarding title report.	0.10	\$205.00	\$20.50
01/08/2024	MJH	Research and analysis re procedure for foreclosing judgment lien.	1.40	\$365.00	\$511.00
01/08/2024	MJH	Additional research re general writs of execution and status of title.	1.10	\$365.00	\$401.50
01/08/2024	MTR	Emails with Michael Harris regarding title report order.	0.10	\$205.00	\$20.50
01/10/2024	MTR	Various emails with First American title regarding order of title report.	0.20	\$205.00	\$41.00
01/10/2024	SDE	[NO CHARGE] Arrange to obtain certified copy of Arizona judgment.	0.30	\$0.00	\$0.00
01/12/2024	MTR	Various emails with First American Title regarding title report request.	0.20	\$205.00	\$41.00
01/12/2024	SDE	Received certified copy of Arizona judgment, prepared same for recording; recorded in Mohave County.	1.40	\$215.00	\$301.00
01/16/2024	MTR	Emails with Mike Middendorf and Michael Harris regarding title report.	0.10	\$205.00	\$20.50
01/22/2024	MTR	Emails with Mike Middendorf regarding title report.	0.20	\$205.00	\$41.00
01/24/2024	MMD	Review and analyze Arizona case law regarding securing judgments and judgment liens (.9).	0.90	\$285.00	\$256.50

February 02, 2024
 Client: PA123
 Matter: 00007
 Invoice #: 1301767

SacksTierney P.A.
 ATTORNEYS

Page: 2

SERVICES

Date		Description of Services	Hours	Rate	Amount
01/25/2024	MMD	Legal research and analysis of Arizona law regarding securing judgments following the application for writ of execution(1.2); review and analyze case file regarding pleadings for judgment foreclosures (.6); various email correspondence with attorney Harris regarding research results and next steps (.2); discuss writ of execution against property with attorney Reynolds (.2).	2.20	\$285.00	\$627.00
01/26/2024	MTR	Emails with Mike Middendorf regarding status of title report.	0.20	\$205.00	\$41.00
01/29/2024	MJH	Reviewed draft pleadings for foreclosure and process re same.	1.10	\$365.00	\$401.50
01/29/2024	MMD	Update memo for the purpose of utilizing for writ of execution pleadings (.7); draft application for issuance of writ of general execution (.4); review and analyze Arizona and federal law regarding affidavit for writ of execution (.3); begin draft of affidavit and request for issuance of writ of execution (.4); begin draft of writ of execution (.2); email correspondence with attorney Harris regarding missing information for affidavit and writ of execution (.1).	2.10	\$285.00	\$598.50
01/31/2024	MMD	Draft affidavit and request for issuance of writ of execution (.4); legal research and analysis of Arizona law regarding judgment liens against property held as joint tenants with right to survivorship(.7); legal research and analysis of Arizona law regarding judgment liens against community property when one party has less liability(.4); draft writ of execution (.4).	1.90	\$285.00	\$541.50
Total Professional Services			13.50		\$3,864.00

SUMMARY

		Hours	Rate	Amount
MJH	Michael J. Harris	3.60	\$365.00	\$1,314.00
MMD	Mea M. Donnelly	7.10	\$285.00	\$2,023.50
MTR	Mallory T. Rasmussen	1.10	\$205.00	\$225.50
SDE	Susan D. Ensslin	1.40	\$215.00	\$301.00
SDE	Susan D. Ensslin	0.30	\$0.00	\$0.00

February 02, 2024
 Client: PA123
 Matter: 00007
 Invoice #: 1301767

SacksTierney P.A.
 ATTORNEYS

Page: 3

DISBURSEMENTS

Date	Description of Disbursements	Amount
01/11/2024	Nationwide Legal Services, LLC- Filing/Delivery Fee- U.S. District Court-Arizona/Certified Copy of "Amended Judgment in a Civil Case"	\$49.30
01/12/2024	Mohave County Recorder - Judgment document	\$34.00
01/31/2024	Administrative Expense	\$193.20
	Total Disbursements	\$276.50
	Total Services	\$3,864.00
	Total Disbursements	\$276.50
	Total Current Charges	\$4,140.50
	Previous Balance	\$2,803.88
	Current Interest	\$4.69
	PAY THIS AMOUNT	\$6,949.07

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

SacksTierney P.A.

A T T O R N E Y S

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

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

Attention: Matthew J. Ball

March 12, 2024
 Client: PA123
 Matter: 00007
 Invoice #: 1302971

Page: 1

RE: Jonathan Hafen v. Leslie & Gretchen Howell

For Professional Services Rendered Through February 29, 2024

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
02/01/2024	MTR	Various emails with Mike Middendorf and Michael Harris regarding title report.	0.20	\$225.00	\$45.00
02/06/2024	MJH	Reviewed and revised drafts. Drafted email to client re same.	1.30	\$395.00	\$513.50
02/08/2024	MJH	Reviewed and analysis of next steps and pleadings for filing.	0.60	\$395.00	\$237.00
02/09/2024	MJH	Finalized Application for Writ of Execution and related pleadings.	0.60	\$395.00	\$237.00
02/12/2024	MJH	Reviewed notice from Court re additional information required.	0.10	\$395.00	\$39.50
02/13/2024	MJH	Revised Writ and reviewed next steps. Drafted email to co-counsel re same.	0.50	\$395.00	\$197.50
02/14/2024	MMD	Analyze federal law regarding next steps to service Writ of execution to U.S. Marshal(.4); phone call with U.S. Marshals office regarding the same(.3); draft letter to send to U.S. Marshal to deliver Writ of execution (.6); email correspondence with attorney Harris regarding next steps for writ of execution with U.S. Marshal's office (.2).	1.50	\$300.00	\$450.00
02/16/2024	MMD	Calculate updated interest rate(.2); update Writ of execution with new interest rate and affidavit with new interest rate(.1); email correspondence with attorney Harris regarding the same (.1).	0.40	\$300.00	\$120.00
02/21/2024	MJH	Reviewed and revised writ and affidavit.	0.20	\$395.00	\$79.00
Total Professional Services			5.40		\$1,918.50

March 12, 2024
 Client: PA123
 Matter: 00007
 Invoice #: 1302971

SacksTierney P.A.
 ATTORNEYS

Page: 2

SUMMARY

		Hours	Rate	Amount
MJH	Michael J. Harris	3.30	\$395.00	\$1,303.50
MMD	Mea M. Donnelly	1.90	\$300.00	\$570.00
MTR	Mallory T. Rasmussen	0.20	\$225.00	\$45.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
02/01/2024	Nationwide Legal Services, LLC- Filing/Delivery Fee- 1/11/24 United States District Court, Arizona/Certified copy of Amended Judgment in a Civil Case	\$49.30
02/01/2024	Thomson Reuters-West Publishing Group- Online Research - Westlaw- January 2024 Statement	\$295.51
02/29/2024	Administrative Expense	\$95.92
	Total Disbursements	\$440.73
	Total Services	\$1,918.50
	Total Disbursements	\$440.73
	Total Current Charges	\$2,359.23
	Previous Balance	\$6,949.07
	PAY THIS AMOUNT	\$9,308.30

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

SacksTierney P.A.

ATTORNEYS

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

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

Attention: **Matthew J. Ball**

April 08, 2024
 Client: PA123
 Matter: 00007
 Invoice #: 1303726

Page: 1

RE: Jonathan Hafen v. Leslie & Gretchen Howell

For Professional Services Rendered Through March 31, 2024

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
03/01/2024	MMD	Office conference with L. Simonini regarding correspondence with US Marshal (.2); finalize letter to U.S. Marshal (.1); email correspondence with US Marshal's office regarding executing judgment (.2).	0.50	\$300.00	\$150.00
03/07/2024	MMD	Draft US285 for Parcel A (.2); draft US285 for Parcel B(.2); draft US285 for Parcel 93(.2); draft US285 for Parcels 92A-C(.2); analyze Mohave county assessor to confirm address and vacant status of the four properties for US Marshal(.3); email correspondence with attorney Harris regarding the above (.1).	1.20	\$300.00	\$360.00
03/22/2024	MMD	Email correspondence with attorney Harris regarding US285s (.1).	0.10	\$300.00	\$30.00
03/25/2024	MJH	Reviewed Form 285s and analyzed next steps.	0.60	\$395.00	\$237.00
03/25/2024	MMD	Update four us285 for attorney Harris's changes (.4); email correspondence with US Marshall regarding the same (.1).	0.50	\$300.00	\$150.00
03/26/2024	MMD	Email correspondence with US Marshall confirming plan of action (.1).	0.10	\$300.00	\$30.00
Total Professional Services			3.00		\$957.00

SUMMARY

		Hours	Rate	Amount
MJH	Michael J. Harris	0.60	\$395.00	\$237.00

April 08, 2024
 Client: PA123
 Matter: 00007
 Invoice #: 1303726

SacksTierney P.A.
 ATTORNEYS

Page: 2

SUMMARY

		Hours	Rate	Amount
MMD	Mea M. Donnelly	2.40	\$300.00	\$720.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
03/31/2024	Administrative Expense	\$47.85
	Total Disbursements	\$47.85
	Total Services	\$957.00
	Total Disbursements	\$47.85
	Total Current Charges	\$1,004.85
	Previous Balance	\$9,308.30
	Current Interest	\$34.50
	<i>Less Payments</i>	(\$2,803.88)
	PAY THIS AMOUNT	\$7,543.77

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

EXHIBIT E

EXHIBIT E

TWENTY-FIRST INTERIM FEE

APPLICATION

Proposed Order

EXHIBIT E

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

Attorneys for Jonathan O. Hafen as Receiver

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

COMMODITY FUTURES TRADING
COMMISSION, and

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

Plaintiffs,

vs.

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

Defendants;

and

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

Relief Defendants.

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

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

Judge Tena Campbell

Magistrate Judge Dustin Pead

Before the Court is the twenty-second interim fee application (the “Fee Application”), submitted by Jonathan O. Hafen in his capacity as the Court-Appointed Receiver for Rust Rare Coin Inc., Gaylen Dean Rust, R Legacy Racing Inc., R Legacy Entertainment LLC, R Legacy Investments LLC, Denise Gunderson Rust, and Joshua Daniel Rust (collectively, “Defendants”) seeking approval by the Court for the fees and expenses incurred by the Receiver; the Receiver’s counsel, Parr Brown Gee & Loveless (“Parr Brown”), Sacks Tierney P.A. (“Arizona Counsel”), and the Receiver’s accountants, Berkeley Research Group (“BRG”), for the period of January 1, 2024, through March 31, 2024 (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: \$31,008.00 for fees and expenses.
- b. Parr Brown: \$202,151.65 for fees and expenses.
- c. BRG: \$48,468.37 for fees and expenses.
- d. Arizona Counsel: \$7,504.58 for fees and expenses.

3. The Receiver and his professionals will not take any fees or be reimbursed for any expenses from the Receivership Estate until after the Receiver recovers at least three times the amount of the fees for the Estate, at which time the approved fees and expenses shall be paid.

DATED this ____ day of June 2024.

Honorable Dustin B. Pead
United States Magistrate Judge