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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-THIRD 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-third interim fee application (this "Fee Application"), seeking approval by the Court for the fees and expenses incurred by the Receiver; the Receiver's counsel, Parr Brown Gee & Loveless ("Parr Brown") and Sacks Tierney P.A. ("Arizona Counsel"); and the Receiver's accountants, Berkeley Research Group ("BRG"), for the period of April 1, 2024, through June 30, 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-Third Quarterly Status Report*, which includes a status report for the period of April 1, 2024, through June 30, 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 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.

[1] Docket No. 549 filed August 1, 2024.

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

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

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

IV. SUMMARY OF AMOUNTS REQUESTED

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

a. Receiver: From April 1, 2024, through June 30, 2024, the Receiver billed a total of 38.2 hours for services to the Receivership Estate. The Receiver is seeking approval for the payment of fees and expenses totaling $18,336.00. *See* **Exhibit A**.

b. Parr Brown: From April 1, 2024, through June 30, 2024, Parr Brown billed

a total of 507.5 hours for legal services to the Receivership Estate. Parr Brown is seeking approval for the payment of fees and expenses totaling $180,011.81. *See* **Exhibit B**. These amounts include a voluntary write down of $12,763.50.

c. BRG: From April 1, 2024, through June 30, 2024, BRG billed a total of 156.90 hours providing forensic, tax, and general accounting services to the Receivership Estate. BRG is seeking approval for the payment of fees and expenses totaling $57,373.26. *See* **Exhibit C**. These amounts include a voluntary write down of $937.50.

d. Arizona Counsel: From April 1, 2024, through June 30, 2024, Arizona Counsel billed a total of 21 hours for legal services to the Receivership Estate. Arizona Counsel is seeking approval for the payment of fees and expenses totaling $7,155.73. *See* **Exhibit D** (this number differs from Exhibit D as it removes $62.54 in interest charges).

11. The amounts requested reflect a total of $13,701.00 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.

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 claims and includes the Claimants' self-reported amount claimed, the allowed amount of the claim as determined by the Receiver, and—if applicable—an explanation of the Receiver's determination and objection to all or part of the claim. Only three unresolved claims remain which are either involved in claw back litigation or are stayed by the Court. Parr Brown continues to diligently resolve each unresolved claim while minimizing expenses to the Receivership Estate.

Exhibit C-Time Records of BRG

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

Net Winner / Claims Analysis

26. BRG continued to assist the Receiver in providing analysis for investors to be used in discussions, negotiations, and potential settlement recoveries in outstanding claw back actions

that have been brought by the Receiver.

Claims Process & Distribution

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

Recovery Litigation

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

29. BRG has continued to work with the Receiver and his counsel to analyze and review various litigation issues, including preparation of summary judgment motions, default judgements, proposed settlement offers and financial information from investors to determine the appropriateness and accuracy of such offers, as well as claims concerning the ability to pay amounts sought by the Receiver.

Tax Compliance and Analysis

30. BRG reviewed, prepared, and submitted required forms to taxing authorities related to the 2023 tax return. BRG analyzed transactions for the period of January 1, 2023, through December 31, 2023, in order to identify taxable receipts, deductible expenditures, and other reportable activity for the preparation of the 2023 income tax returns. BRG analyzed numerous 2023 cash transactions and researched the proper reporting for the preparation of the 2023 income tax returns of the receivership. BRG prepared additional supporting work papers to be used in the preparation of the 2023 income tax returns of the receivership. BRG prepared the 2023 receivership federal and state income tax returns. The completed returns were reviewed for

completeness and accuracy. Corrections and revisions were made as was required.

31. BRG also prepared, reviewed and filed federal payroll tax returns for Q1 2024 in connection with the initial distributions made related to the wage claims of former employees of Rust Rare Coin. This process also involved requesting and setting up accounts with the Utah Department of Workforce Services and local taxing authorities.

32. Additionally, as requested by the Receiver, BRG reviewed and discussed various tax related issues with the Receiver and his counsel.

Law Enforcement Inquiries

33. BRG reviewed all investor cash and non-cash activity and prepared a summary schedule pursuant to the request of the CFTC.

Exhibit D-Time Records of Arizona Counsel

34. As a result of the Receiver's and his team's claw back 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 initiated foreclosure proceedings which were stifled due to the filing of a bankruptcy by the net winners. Arizona Counsel is currently working with the Receiver and his team to have the bankruptcy dismissed so that the foreclosure proceedings can move forward.

VI. PRIOR REQUESTS AND INTERIM NATURE OF REQUEST

35. The Receiver has previously filed twenty-two 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, 534 and 544. This is the Twenty-Third 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,

[2] The Receiver's First Interim Fee Application was filed on February 22, 2019. *See* Dkt. No. 120. The Receiver's Second Interim Fee Application was filed on May 24, 2019. *See* Dkt. No. 187. The Receiver's Third Interim Fee Application was filed on September 4, 2019. *See* Dkt. No. 241. The Receiver's Fourth Interim Fee Application was filed on December 31, 2019. *See* Dkt. No. 274. The Receiver's Fifth Interim Fee Application was filed on March 10, 2020. *See* Dkt. No. 292. The Receiver's Sixth Interim Fee Application was filed on August 7, 2020. *See* Dkt. No. 333. The Receiver's Seventh Interim Fee Application was filed on November 13, 2020. *See* Dkt. No. 367. The Receiver's Eighth Interim Fee Application was filed on January 15, 2021. *See* Dkt. No. 382. The Receiver's Ninth Interim Fee Application was filed on May 27, 2021. *See* Dkt. No. 413. The Receiver's Tenth Interim Fee Application was filed on July 6, 2021. *See* Dkt. No. 416. The Receiver's Eleventh Interim Fee Application was filed on October 5, 2021. *See* Dkt. No. 428. The Receiver's Twelfth Interim Fee Application was filed on December 13, 2021. *See* Dkt. No. 434. The Receiver's Thirteenth Interim Fee Application was filed on February 22, 2022. *See* Dkt. No. 442. The Receiver's Fourteenth Interim Fee Application was filed on June 14, 2022. *See* Dkt. No. 461. The Receiver's Fifteenth Interim Fee Application was filed on September 12, 2022. *See* Dkt. No. 481. The Receiver's Sixteenth Interim Fee Application was filed on December 14, 2022. *See* Dkt. No. 488. The Receiver's Seventeenth Interim Fee Application was filed on March 14, 2023. *See* Dkt. No. 494. The Receiver's Eighteenth Interim Fee Application was filed on June 12, 2023. *See* Dkt. No. 508. The Receiver's Nineteenth Interim Fee Application was filed on September 20, 2023. *See* Dkt. No. 516. The Receiver's Twentieth Interim Fee Application was filed on December 13, 2023. *See* Dkt. No. 528. The Receiver's Twenty-First Interim Fee Application was filed on March 13, 2024. *See* Dkt. No. 533. The Receiver's Twenty-Second Interim Fee Application was filed on March 13, 2024. *See* Dkt. No. 543.

and the Receiver submits that given the work that has been performed as reflected in the attached time entries, the fees and expenses that have been incurred are reasonable.

42. Pursuant to Paragraph 62 of the Appointment Order, *see* Dkt. No. 54, the Receiver represents and avers that this Fee Application complies with the terms of the billing instructions 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 $18,336.00; Parr Brown's fees and expenses in the amount of $180,011.81; BRG's fees and expenses in the amount of $57,373.26; Arizona Counsel's fees and expenses in the amount of $7,155.73, 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 11th day of September 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-THIRD INTERIM FEE APPLICATION was (1) electronically filed with the Clerk of the Court through the CM/ECF system on September 11, 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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/s/ Lori J. Stumpf

EXHIBIT A

EXHIBIT A

TWENTY-THIRD INTERIM FEE APPLICATION

Time Records of Receiver

EXHIBIT A

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

July 15, 2024

Invoice: 949486
Client: 177110
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration

Professional Services	$ 2,064.00
Total Costs Advanced	$ .00
TOTAL THIS INVOICE	**$ 2,064.00**

PARR BROWN GEE & LOVELESS

Invoice: 949486
Rust Rare Coin Receiver
Administration

July 15, 2024
Client: 177110
Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/02/24	JOH	Attention to proposed consent order; Follow up re clawback action; Review related documents	2.10	1,008.00
4/23/24	JOH	Attention to tax matters; Follow up re clawback settlement	.50	240.00
4/25/24	JOH	Follow up with accountants re tax matters	.10	48.00
4/26/24	JOH	Attention to tax returns; Review same; Email with accountants re same; Attention to two clawback actions; Review documents	1.60	768.00

TOTAL PROFESSIONAL SERVICES **$ 2,064.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	480.00	4.30	2,064.00
TOTALS		**4.30**	**$ 2,064.00**

TOTAL THIS INVOICE **$ 2,064.00**

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

July 15, 2024

Invoice: 949486
Client: 177110
Matter: 1

REMITTANCE ADVICE

RE: Administration

BALANCE DUE THIS INVOICE **$ 2,064.00**

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 # 949486

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

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

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

July 15, 2024

Invoice: 949487
Client: 177110
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Assett Analysis & Recovery

Professional Services	$ 16,272.00
Total Costs Advanced	$ .00
TOTAL THIS INVOICE	**$ 16,272.00**

PARR BROWN GEE & LOVELESS

Invoice: 949487
Rust Rare Coin Receiver
Asset Analysis & Recovery

July 15, 2024
Client: 177110
Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/03/24	JOH	Attention to two clawback actions; Review related documents; Email with legal counsel re multiple clawback actions	1.80	864.00
4/05/24	JOH	Review email correspondence from legal counsel; Attention to clawback action	1.10	528.00
4/10/24	JOH	Attention to two clawback actions; Review related documents; Review communication from victim re distribution status; Follow up with legal counsel re same	1.50	720.00
4/15/24	JOH	Attention to three clawback actions; Email and calls with legal counsel re same; Follow up re victim inquiry as to receivership status; Review email correspondence re numismatic expert; Meet with counsel re clawback action; Review related email correspondence; Review documents	3.40	1,632.00
4/17/24	JOH	Follow up work on two clawback actions; Review documents re same	1.30	624.00
4/22/24	JOH	Attention to resolving clawback action; Review related email correspondence and documents	1.20	576.00
4/28/24	JOH	Attention to clawback action; Email with legal counsel re same	.30	144.00
4/30/24	JOH	Attention to clawback action; Review draft quarterly report and related materials	1.10	528.00
5/01/24	JOH	Attention to two clawback actions; Review quarterly report and related documents; Email with legal counsel re same; Review related documents	1.90	912.00
5/02/24	JOH	Attention to clawback action; Follow up re mediation; Review related documents and email communication	.80	384.00
5/03/24	JOH	Attention to two clawback actions; Meet with legal counsel re same; Review email correspondence and documents re same	1.30	624.00
5/17/24	JOH	Attention to two clawback actions	.60	288.00
5/20/24	JOH	Attention to clawback action; Review documents; Follow up with legal counsel re demand in clawback action	.80	384.00
5/21/24	JOH	Attention to clawback action; Follow up with legal counsel re same and related matter	.90	432.00
5/22/24	JOH	Attention to two clawback actions; Call with legal counsel	.80	384.00
5/23/24	JOH	Follow up re status hearing and related matters; Attention to clawback action	.60	288.00
6/01/24	JOH	Attention to clawback action; Follow up with legal counsel re same; Review documents	1.10	528.00
6/04/24	JOH	Attention to three clawback actions; Call with legal counsel re same	1.20	576.00
6/05/24	JOH	Attention to clawback action; Follow up with legal counsel re same; Review documents	.80	384.00
6/07/24	JOH	Attention to various clawback actions; Review related documents; Email with legal counsel re clawback litigation status	1.40	672.00
6/10/24	JOH	Attention to three clawback claims; Review related documents and email correspondence; Follow up re open issues	1.90	912.00

PARR BROWN GEE & LOVELESS

Invoice: 949487
Rust Rare Coin Receiver
Asset Analysis & Recovery

July 15, 2024
Client: 177110
Matter: 2

Date	Tkpr	Description	Hours	Amount
6/11/24	JOH	Attention to two clawback actions; Email with client re potential settlement of clawback action	1.00	480.00
6/12/24	JOH	Attention to four clawback actions; Call and Email with legal counsel re various matters; Review documents	1.60	768.00
6/13/24	JOH	Attention to clawback actions; Review related information and documents; Email with legal counsel re two clawback actions	1.40	672.00
6/21/24	JOH	Review documents relating to claim; Attention to four clawback auctions; Review legal authorities	1.20	576.00
6/24/24	JOH	Attention to two clawback actions; Review documents; Email with legal counsel re clawback settlement	2.00	960.00
6/27/24	JOH	Attention to clawback action; Review related documents	.90	432.00

TOTAL PROFESSIONAL SERVICES **$ 16,272.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	480.00	33.90	16,272.00
TOTALS		**33.90**	**$ 16,272.00**

TOTAL THIS INVOICE **$ 16,272.00**

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

July 15, 2024

Invoice: 949487
Client: 177110
Matter: 2

REMITTANCE ADVICE

RE: Assett Analysis & Recovery

BALANCE DUE THIS INVOICE **$ 16,272.00**

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 # 949487

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

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

EXHIBIT B

EXHIBIT B

TWENTY-THIRD INTERIM FEE APPLICATION

Time Records of Parr Brown

EXHIBIT B

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

July 15, 2024

Invoice: 949479
Client: 176430
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration of Receivership Estate

Professional Services	$ 7,458.50
Total Costs Advanced	$ 72.44
TOTAL THIS INVOICE	**$ 7,530.94**

PARR BROWN GEE & LOVELESS

Invoice: 949479
Rust Rare Coin Receivership
Administration of Receivership Estate

July 15, 2024
Client: 176430
Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/01/24	JMC	Correspond with Jon Hafen re new rates and related matters	.10	46.00
4/02/24	JMC	Correspond with Jeff Balls re Denise Rust fees and impact on restitution order for government	.20	92.00
4/04/24	JMC	Correspond with Jeff Shaw and Jeff Balls re collection and tax issues; Correspond with Claire McGuire re government's request	.40	184.00
4/09/24	JMC	Correspond with Matt Ball re payment of Howell litigation expenses	.10	46.00
4/15/24	JMC	Review tax notices and related items	.10	46.00
4/16/24	JMC	Correspond with Ian Russell and Claire McGuire re sale of Gold Eagles and related issues	.20	92.00
4/22/24	JMC	Correspond with Walter Peterson and Jeff Balls re quarterly report	.20	92.00
4/24/24	WOP	Correspond with Kathy re ledger for quarterly report; Review the same; Correspond with Jeff re same; Draft quarterly report; Review list of claimants; Further correspondence with Jeff	2.80	882.00
4/29/24	JMC	Review and revise quarterly report; Correspond with Jeff Balls and Jon Hafen re the same	.50	230.00
4/29/24	JAB	Review litigations matters; Attend status conference hearing; Draft quarterly report; Draft notices of dismissal	6.40	2,528.00
4/30/24	JMC	Correspond with Jon Hafen re quarterly report	.10	46.00
5/01/24	JMC	Correspond with Jon Hafen re quarterly report; Coordinate filing and service of the same; Correspond with Jeff Balls re hearing	.50	230.00
5/03/24	WOP	Review comments to quarterly report; Revise template re same; Review docket report	1.90	598.50
5/07/24	WOP	No Charge - Review attorney time sheets in preparation for fee application; Correspond with various attorneys re same; Redact names; Correspond with BRG re same	4.20	N/C
5/08/24	WOP	No Charge - Review previous fee applications re calculations of fees	4.80	N/C
5/09/24	WOP	No Charge - Continue review and redaction of time sheets; Review docket report; Review previous fee applications re Arizona counsel; Review order appointing Receiver re same; Correspond with Arizona counsel	3.90	N/C
5/13/24	WOP	No Charge - Correspond with Wayne Klein re fee application; Correspond with BRG re same; Review time records; Perform analysis re same; Continue fee application; Correspond with Caralee re revisions to rime records	5.60	N/C
5/14/24	WOP	No Charge - Continue draft of fee application; Correspond with Caralee re changes to time records	1.40	N/C
5/17/24	JMC	Review correspondence re distributions; Correspond with Jacob Strain	.10	46.00
5/20/24	WOP	No Charge - Perform additional analysis of previous time records submitted in fee applications; Review Arizona counsel records; Review conflict receiver records	2.90	N/C

PARR BROWN GEE & LOVELESS

Invoice: 949479
Rust Rare Coin Receivership
Administration of Receivership Estate

July 15, 2024
Client: 176430
Matter: 1

Date	Tkpr	Description	Hours	Amount
5/21/24	WOP	No Charge - Review and redact BRG time records; Review docket report; Continue draft of fee application	3.40	N/C
5/22/24	WOP	No Charge - Perform second review of attorney time sheets; Review BRG time sheets; Correspond with Matt Ball re Arizona time records; Call with Arizona counsel re same; Review prior applications re same; Complete draft of fee application; Correspond with Caralee re unpaid invoice; Create exhibits; Email correspondence with Jeff and Joe re fee application	6.10	N/C
5/23/24	JMC	Correspond with Jeff Balls re Larsen summary judgement and related matters; Prepare for and participate in status hearing; Review summaries of various cases	2.90	1,334.00
5/23/24	WOP	No Charge - Revise fee application calculations; Revise exhibits	1.70	N/C
5/31/24	JMC	No Charge - Correspond with Jeff Balls re fee application	.10	N/C
5/31/24	JAB	No Charge - Review and revise attorney fees application; Conference with Joseph Covey	.50	N/C
6/01/24	JAB	No Charge - Correspond with Matt Ball re invoices	.10	N/C
6/03/24	JMC	No Charge - Review Rust deposits	.10	N/C
6/04/24	JAB	No Charge - Revise application for attorney fees	.40	N/C
6/04/24	WOP	No Charge - Revise fee application and exhibits	.80	N/C
6/05/24	JMC	No Charge - Correspond with Jeff Balls re fee application	.10	N/C
6/06/24	JMC	No Charge - Review and finalize fee application; Correspond with Jeff Balls and government re the same	2.20	N/C
6/12/24	JMC	No Charge - Correspond with Jennifer Korb and Tom Simek re fee application; Coordinate filing of the same	.30	N/C
6/13/24	JMC	Review and analyze Wheeler lawsuit and potential disposition; Correspond with Tom Melton, Robert Wing and Jeff Balls re the same	1.80	828.00
6/13/24	JAB	No Charge - Review order granting fees; Analyze fees	.30	N/C
6/18/24	JMC	Correspond with Caralee Marsh re invoice payments for legal services	.20	92.00
6/25/24	JMC	Correspond with Matt Ball re local counsel in Arizona	.10	46.00

TOTAL PROFESSIONAL SERVICES **$ 7,458.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	460.00	7.50	3,450.00
Jeffery A Balls	395.00	6.40	2,528.00
Walter O Peterson	315.00	4.70	1,480.50
TOTALS		**18.60**	**$ 7,458.50**

PARR BROWN GEE & LOVELESS

Invoice: 949479
Rust Rare Coin Receivership
Administration of Receivership Estate

July 15, 2024
Client: 176430
Matter: 1

COSTS ADVANCED

Date	Description	Amount
4/21/24	Grasshopper.com	19.45
5/01/24	PACER Electronic Court Records	6.10
5/21/24	Grasshopper.com	19.50
6/12/24	PACER Electronic Court Records	7.90
6/21/24	Grasshopper.com	19.49

TOTAL COSTS ADVANCED **$ 72.44**

TOTAL THIS INVOICE **$ 7,530.94**

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

July 15, 2024

Invoice: 949479
Client: 176430
Matter: 1

REMITTANCE ADVICE

RE: Administration of Receivership Estate

BALANCE DUE THIS INVOICE $ 7,530.94

Please return this advice with payment to:

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

Wire Transfer Instructions

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

E-Check

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

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

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

Please reference your invoice # 949479

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

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

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

July 15, 2024

Invoice: 949482
Client: 176430
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Asset Analysis & Recovery

Professional Services	$ 165,815.00
Total Costs Advanced	$ 1,907.87
TOTAL THIS INVOICE	**$ 167,722.87**

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

PARR BROWN GEE & LOVELESS

Invoice: 949482
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2024
Client: 176430
Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/01/24	JMC	Correspond with Jeff Balls, Michael Hoppe and Claire McGuire re Larsen mediation and summary judgment issues; Correspond with James Tracy and others re summary judgments	1.50	690.00
4/01/24	MTH	Review and respond to correspondence from Claire McGuire and Jeff Balls re response to Larsen's counsel re mediation	.10	43.00
4/01/24	MTH	Meeting with Joe Covey and Claire McGuire re Larsen case and proposed mediation and summary judgment briefing	.40	172.00
4/01/24	MTH	Review correspondence from Joe Covey and from James Tracy re Larsen matter	.20	86.00
4/01/24	MJB	(Hafen v. Howell) Review reply brief (0.4)	.40	170.00
4/01/24	JAB	Review Howells' reply brief; Conference with Joseph Covey; Review correspondence	.60	237.00
4/01/24	CMM	Attorney conference with Joseph Covey and Michael Hoppe re requested extensions in the Larsen matter; Communicate with opposing counsel re the same; Review documents related to inability to pay; Review gold prices and expert reports re the same; Review and discuss stipulation and proposed order; Communicate with opposing counsel re the same	6.80	2,006.00
4/01/24	LH	Read and respond to email from Ted Terry counsel	.10	23.50
4/02/24	JMC	Correspond with James Tracy and Michael Hoppe re additional extension in Larsen litigation and settlement offer; Correspond with Jon Hafen and others re the same	2.50	1,150.00
4/02/24	MTH	Review and respond to correspondence from Joe Covey re Larsen matter	.10	43.00
4/02/24	MTH	Telephone conference with Joe Covey re resolution strategy in Larsen matter	.60	258.00
4/02/24	JAB	Review correspondence; Review time report	.40	158.00
4/02/24	CMM	Communicate with Parr Team and opposing counsel re stipulated motion and order for extension and settlement discussions; Review motion and order for extension; Review documents for inability to pay issue; Review expert report re the same	5.80	1,711.00
4/02/24	LH	Telephone conference with Philip Weener attorney for Edward Terry re receivership status; Email Philip Weener re contact information for Jeff Balls; Document management re same	.30	70.50
4/03/24	JMC	Correspond with James Tracy, Jon Hafen, Claire McGuire, Michael Hoppe and others re Larsen settlement, discovery issues and related matters; Draft settlement proposal	2.40	1,104.00
4/03/24	MJB	(Hafen v. Howell) Telephone conference with Dave Amer (0.1); Correspond with Jon Hafen (0.1)	.20	85.00
4/03/24	CMM	Review ability to pay documents in Larsen matter; Telephone conference with Jeff Shaw and Joseph Covey re expert analysis from Mark Hashimoto	6.80	2,006.00

PARR BROWN GEE & LOVELESS

Invoice: 949482
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2024
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
4/04/24	CMM	Communicate with potential claw back defendant re proposed settlement; Review proposed settlement and communicate with Parr Brown Team re the same; Review order and motion filed in Larsen action; Review and revise first set of discovery requests in Oberhansly action; Meet with Robert Wing re the same and general litigation strategy	7.60	2,242.00
4/04/24	RGW	Revise discovery	.70	315.00
4/05/24	JMC	Correspond with Matt Ball re Howell litigation issues; Correspond with Tom Simak re investors information	1.00	460.00
4/05/24	MJB	(Hafen v. Howell) Correspond with Joe Covey and Jeff Balls (0.1); Draft letter to Angela Amidan (0.2); Correspond with Mea Donnelly (0.1)	.40	170.00
4/05/24	CMM	Communicate with Robert Wing re upcoming deposition and production of documents; Review all produced documents; Research adverse presumption in the case of destruction of documents; Review spreadsheet re gold transfers; Produce first set of discovery requests to opposing counsel	6.60	1,947.00
4/05/24	RGW	Conference with Claire McGuire re Oberhansly; Analyze issues re discovery and summary disposition	1.80	810.00
4/08/24	JMC	Correspond with Matt Ball and government re collection efforts and related issues	.20	92.00
4/08/24	MJB	(Hafen v. Howell) Correspond with Mea Donnelly (0.1)	.10	42.50
4/08/24	CMM	Communicate re settlement with potential claw back defendant; Draft email re discovery issues	1.80	531.00
4/08/24	LH	Read email from Philip Weener (counsel to Edward Terry) to Jeff Balls re Rust receivership status	.10	23.50
4/09/24	LH	Read and respond to emails	.20	47.00
4/10/24	CMM	Review mediation brief and gold transfer spreadsheet in Oberhansly matter; Draft analysis re the same; Communicate with BRG re request from government for investor analysis	3.90	1,150.50
4/10/24	LH	Read and respond to emails from claimants and lawyers for claimants re new checks and status of receivership; Email Jeff Balls re same; Review claims registry and update re addresses; Email claimants re distribution; Start new checks list	.90	211.50
4/11/24	JMC	Correspond with Jeff Balls re status conference hearings in several matters; Review hearing requests	.30	138.00
4/11/24	CMM	Review status of various claw back actions and request from Court for status hearings	1.70	501.50
4/12/24	JAB	Review court filings; Review bank information	.50	197.50
4/15/24	JMC	Correspond with Jon Hafen and others re settlement with Larsen; Draft settlement offer to Larsen; Correspond with Jeff Shaw and James Tracy re settlement issues	2.20	1,012.00
4/15/24	JMC	Correspond with Lori Stumpf, Jeff Balls and Claire McGuire re coins and sales	.40	184.00
4/15/24	MTH	Review correspondence from Joe Covey re settlement proposal to Rick Larsen	.10	43.00

PARR BROWN GEE & LOVELESS

Invoice: 949482
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2024
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
4/15/24	JAB	Correspond with Jeff Shaw; Conference with Robert Wing; Review settlement offer for Larsen; Correspond with Ryan Pahnke; Conference with Joseph Covey	1.00	395.00
4/15/24	CMM	Review inventory of coins left to be liquidated; Conference call with Joseph Covey re the same; Communicate with numismatic expert re sale of the same; Meeting with Joseph Covey and Michael Hoppe re settlement proposal and value; Draft settlement agreement with potential defendant; Communicate with opposing counsel re the same	6.70	1,976.50
4/15/24	LH	Read and respond to emails from claimants re cashed distribution checks and update claims registry re same	.20	47.00
4/16/24	MTH	Review correspondence from Joe Covey to opposing counsel re settlement proposal in Larsen matter	.10	43.00
4/16/24	MJB	(Hafen v. Howell) Conference with Jeff Balls (0.1); Correspond with Mea Donnelly (0.1)	.20	85.00
4/16/24	JAB	Correspond with Lori Stumpf re coins; Review litigation matters; Telephone conference with Jeff Shaw and Claire McGuire	1.90	750.50
4/16/24	CMM	Review and analyze partial motion for summary judgement in the Larsen matter; Conference call with Jeffery Balls and Jeff Shaw re CFTC request issues	4.60	1,357.00
4/17/24	JAB	Telephone conference with Jeff Shaw; Correspond with Jeff Shaw; Review net winner analysis	.50	197.50
4/17/24	CMM	Communicate with Jeff Shaw re investor analysis; Communicate with CFTC re the same; Follow up with numismatic expert for liquidation of coins	2.20	649.00
4/18/24	JAB	Call Ryan Pahnke re matter; Review correspondence	.30	118.50
4/19/24	MJB	(Hafen v. Howell) Correspond with Michael Harris (0.2)	.20	85.00
4/22/24	JMC	Correspond with James Tracy re proposed settlement with Rick Larsen	.50	230.00
4/22/24	MTH	Review correspondence from Joe Covey and from Larsen's counsel re settlement negotiations	.10	43.00
4/22/24	MJB	(Hafen v. Howell) Conference with Jeff Balls and Joe Covey (0.2); Correspond with Michael Harris (0.1)	.30	127.50
4/22/24	JAB	Conference with Joseph Covey and Matthew Ball; Review correspondence	.60	237.00
4/24/24	MJB	Telephone conference with Jeff Balls, Michael Harris and Mea Donnelley (0.4)	.40	170.00
4/24/24	JAB	Telephone conference with Matthew Ball, Michael Harris, and Mea Donnelly	.50	197.50
4/25/24	JMC	Review and analyze Larsen's response to our summary judgment motion	.40	184.00
4/25/24	JAB	Telephone conference with Jeff Shaw	.20	79.00
4/25/24	CMM	Review and analyze opposition to motion for summary judgement in Larsen; Research associated issues; Review settlement communication and accompanying expert report re the same	8.80	2,596.00

PARR BROWN GEE & LOVELESS

Invoice: 949482
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2024
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
4/26/24	MJB	(Hafen v. Howell) Conference with Jeff Balls (0.1); Correspond with Michael Harris (0.1)	.20	85.00
4/26/24	JAB	Telephone conference with Ryan Pahnke	1.10	434.50
4/29/24	MTH	Review correspondence from James Tracy re settlement negotiations re Larsen case and correspond with legal team re same	.20	86.00
4/29/24	LH	Conceal confidential distribution information in Ledger Report and discuss same with Jeff Balls	1.60	376.00
4/30/24	CMM	Conference call with Jeffery Balls to discuss status hearing	.20	59.00
5/01/24	JAB	Draft motion for default judgment; Review correspondence from Michael Harris	1.20	474.00
5/01/24	CMM	Review motion for partial summary judgement filed by Larsen; Review expert report submitted with the same; Review opposition to plaintiff's motion and accompanying exhibits; Draft outline for response; Communicate with Parr Brown team re extensions for response to the same	4.40	1,298.00
5/02/24	MTH	Review and respond to correspondence from Joe Covey re Larsen matter	.10	43.00
5/02/24	MTH	Review notifications re case events in Nelson matter; Correspond with Joe Covey and Claire McGuire re Larsen	.10	43.00
5/02/24	JAB	Review correspondence from Dominic Shaw	.50	197.50
5/03/24	JMC	Correspond with Michael Hoppe, Jeff Balls and James Tracey re Larsen settlement; Review financials; Correspond with James Tracey re meeting	1.40	644.00
5/03/24	RMB	Review default judgment papers for Olsen and conference with Jeff Balls re same; Review email from Dominic Shaw	.30	130.50
5/03/24	MTH	Meeting with Joe Covey and Jeff Balls re strategy in Larsen matter	.90	387.00
5/03/24	JAB	Conference with Joseph Covey and Michael Hoppe; Review opposition to motion for summary judgment; Correspond with Jeff Shaw; Finalize default packet against investor	4.60	1,817.00
5/06/24	JMC	Correspond with Jeff Balls, James Tracey, Mark Hashimoto and others re Rick Larsen lawsuit, settlement, financials and related issues; Correspond with the court re status of outstanding cases	2.20	1,012.00
5/06/24	JAB	Telephone conference with Jeff Shaw; Review documents; Telephone conference with James Tracy, Joseph Covey, and Mark Hashimoto; Conference with Joseph Covey	2.80	1,106.00
5/06/24	WOP	Call with artist re purchasing catalog; Review purchase agreement re same	2.50	787.50
5/06/24	CMM	Review opposition to summary judgement motion in the Larsen matter; Communicate with Parr Brown litigation team re reply to the same; Research issues related to the same	3.10	914.50
5/06/24	LH	Communicate with claimant about receivership website and future distributions	.10	23.50
5/07/24	TMM	Review order on Guyon motions to dismiss; telephone conference with Robert Wing re same	.60	270.00

PARR BROWN GEE & LOVELESS

Invoice: 949482
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2024
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
5/08/24	MJB	(Hafen v. Howell) Telephone conference with David Amer (0.2)	.20	85.00
5/08/24	CMM	Attend to discovery dispute issues in Oberhansly; Communicate with Robert Wing re the same; Review documents; Communicate with claw back defendant re settlement proposal	5.40	1,593.00
5/08/24	RGW	Emails and call with Claire McGuire re discovery	.30	135.00
5/09/24	CMM	Review and analyze motion for partial summary judgement; Research issues related to factual basis for expert opinion in the same; Communicate with Parr Brown team re upcoming status hearings and potential claw backs to file	5.10	1,504.50
5/10/24	MJB	(Hafen v. Howell) Correspond with Mea Donnelly (0.2)	.20	85.00
5/10/24	JAB	Review information for Collette Taylor; Conference with Claire McGuire; Draft reply in support of motion for summary judgment	4.80	1,896.00
5/10/24	CMM	Research reasonable equivalent value exchanged and timing for value; Telephone correspondence with Robert Wing re discovery sent by defendant; Review discovery; Draft meet and confer letter re the same	6.00	1,770.00
5/13/24	JAB	Draft reply memorandum in support of motion for summary judgment	1.20	474.00
5/13/24	CMM	Communicate with Robert Wing re new group and discovery issues in ongoing litigation; Research and compile information related to new group; Draft summary re the same	3.70	1,091.50
5/14/24	JMC	Correspond with Claire McGuire re Larsen summary judgment reply and opposition and legal strategy	.50	230.00
5/15/24	JAB	Conference with Claire McGuire; Review Denise Rust settlement correspondence; Telephone conference with Jacob Strain; Review distribution documents; Email same to Jacob Strain; Review notices of hearing	3.70	1,461.50
5/15/24	CMM	Research issue of sham affidavits and applicability to plea agreements; Attorney conference with Jeffery Balls re various Rust issues and upcoming hearings; Research disposition of assets from Denise Rust; Draft summary re the same	5.90	1,740.50
5/15/24	RGW	Analyze issue re scheduling conference	.10	45.00
5/16/24	MJB	(Hafen v. Howell) Conference with Jeff Balls (0.1); Correspond with Mea Donnelly (0.1)	.20	85.00
5/16/24	JAB	Draft reply in support of motion for summary judgment; Research case law	4.60	1,817.00
5/16/24	CMM	Communicate with opposing counsel re discovery issues; Research issues with cash recipients; Research ponzi scheme presumption and courts previously rulings re the same; Draft fact section for opposition to motion for partial summary judgment	7.10	2,094.50
5/17/24	JMC	Correspond with James Tracy re summary judgment responses	.30	138.00
5/17/24	JAB	Draft reply in support of motion for summary judgment; Review case law re prejudgment interest	2.90	1,145.50

PARR BROWN GEE & LOVELESS

Invoice: 949482
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2024
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
5/17/24	CMM	Research issues of value exchanged and reasonably equivalent value; Draft argument section of opposition to Larsen's motion for summary judgment; Attorney conference with Parr Brown team re the same; Draft meet and confer letter re discovery deficiencies in claw back action; Attorney conference with Robert Wing re Guyon claw back action and Oberhansly upcoming deadlines; Draft summary of communication history for potential claw back defendant	5.10	1,504.50
5/18/24	MTH	Review correspondence from James Tracy and Joe Covey re summary judgment motions in Larsen matter	.10	43.00
5/20/24	JMC	Correspond with Jeff Balls re summary judgment issues	.20	92.00
5/20/24	JAB	Draft reply in support of motion for summary judgment; Conference with Joseph Covey; Review letter from Peter Guyon; Telephone conference with Josh Lee	3.20	1,264.00
5/20/24	CMM	Communicate with James Tracy re stipulated motion for extension; Draft opposition to summary judgement motion; Research Rule 6 motions without stipulation; Draft argument section of reply in support; Draft and revise fact section of opposition	13.60	4,012.00
5/20/24	TMM	Review Answer and counterclaim; Telephone conference with Robert Wing re same	.40	180.00
5/21/24	JMC	Correspond with Michael Hoppe and Jeff Balls re Larsen litigation and summary judgment matters	.80	368.00
5/21/24	MTH	Review and respond to correspondence from James Tracy and Jeff Balls re Larsen matter; Telephone conference with Joe Covey re Larsen matter; Correspond with team re same	.60	258.00
5/21/24	JAB	Draft reply in support of motion for summary judgment; Telephone conference with Jeff Shaw; Telephone conference with Nate Freeman; Telephone conference with James Tracy and Josh Lee; Conference with Joseph Covey	6.10	2,409.50
5/21/24	CMM	Draft and revise opposition to motion for partial summary judgement in Larsen claw back; Research issues of reasonably equivalent value and sham affidavits; Draft and revise stipulated motion and communicate with opposing counsel re the same; Review court order related to Jacobsen claim; Research issue of expert reliability and underlying factual data in a summary judgement context	9.40	2,773.00
5/22/24	JMC	Correspond with Jeff Balls re status hearing; Review and analyze status of various cases	1.30	598.00
5/22/24	RMB	Review status of claims Terri Andreini investor group; Conference with Jeff Balls and Joe Covey re status hearing on claw-back actions; Prepare for status hearing on claw-back actions	3.10	1,348.50
5/22/24	JAB	Conference with Claire McGuire; Conference with Rodger Burge; Conference with Robert Wing; Draft motion to vacate; Correspond with Judson Pitts; Correspond with James Tracy	6.30	2,488.50

PARR BROWN GEE & LOVELESS

Invoice: 949482
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2024
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
5/22/24	CMM	Draft opposition to summary judgement motion; Draft reply to opposition of Plaintiff's summary judgement motion; Draft stipulated motion for extension of deadline; Research expert reliance in summary judgement motions; Communicate with Jeffery Balls re the same	10.20	3,009.00
5/22/24	RGW	Call with opposing counsel re status and deadlines; Prepare revised scheduling order	1.00	450.00
5/22/24	RGW	Prepare response to counterclaim	1.70	765.00
5/23/24	JAB	Draft opposition to partial motion for summary judgment; Correspond with Ryan Pahnke; Review clawback actions	8.80	3,476.00
5/23/24	CMM	Draft and revise opposition to partial summary judgement in Larsen case; Draft and revise stipulated motion for extension of time to file reply; Draft and revise reply to opposition for summary judgment motion in Larsen case; Draft new section of opposition; Attorney conference with Jeffery Balls re the same; Communicate with opposing counsel re the same	14.10	4,159.50
5/23/24	RGW	Review documents re response to counterclaim	1.10	495.00
5/24/24	JMC	Correspond with Jeff Balls re summary judgment reply and opposition	.30	138.00
5/24/24	JAB	Draft reply and opposition for summary judgment	7.20	2,844.00
5/24/24	CMM	Draft and revise motion for non-stipulated extension of time; Draft and revise opposition to summary judgement motion; Draft and revise reply in support of summary judgment motion; Communicate with Jeffery Balls re the same; Draft and revise appendix for the same	11.60	3,422.00
5/24/24	CY	Phone conference with Claire McGuire re appendix and filings of docs, Revise motion for extension of time to respond; Prepare exhibits for reply and opposition for motion for partial summary judgment; Revise reply and opposition for motion for partial summary judgment; Multiple email correspondence with Claire McGuire re same; File documents with the court (Larsen Case)	5.20	1,040.00
5/24/24	RGW	Review court order re answer to counterclaim; Revise same	1.10	495.00
5/28/24	MTH	Review and respond to correspondence re deadlines in Larsen matter	.10	43.00
5/28/24	JAB	Review documents; Review clawback actions; Review potential clawback actions; Conference with Tom Melton; conference with Claire McGuire; Conference with Robert Wing	4.70	1,856.50
5/28/24	CMM	Review orders re claims procedure to respond to cross claims asserted by Guyon; Communicate with Robert Wing re the same; Meet with Jeffery Balls re Larsen claw back and remaining actions to be filed; Review settlement communications and status of pending actions; Revise tolling agreement termination letter; Draft potential complaint	7.10	2,094.50
5/29/24	JMC	Correspond with Claire McGuire re Darren Nelson bankruptcy case	.10	46.00
5/29/24	MJB	(Hafen v. Howell) Correspond with Jeff Balls (0.1)	.10	42.50
5/29/24	JAB	Draft default judgments; Conference with Robert Wing	1.30	513.50
5/29/24	CMM	Attorney conference re upcoming case deadlines and potential claw back actions; Research various dispositions re the same; Draft summary of the same	2.60	767.00

PARR BROWN GEE & LOVELESS

Invoice: 949482
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2024
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
5/29/24	RGW	Review Call matter; Telephone call with Jeff Balls re same	.50	225.00
5/29/24	RGW	Telephone call with Mr. Bengochea, counsel for Call	.30	135.00
5/30/24	MTH	Review correspondence from Claire McGuire re Nelson bankruptcy	.10	43.00
5/30/24	JAB	Review correspondence from Jeff Shaw; Draft motions for default	1.10	434.50
5/30/24	CMM	Review Guyon pleadings and new counterclaims; Draft response to counter claims and gather court orders re inability to submit a claim after bar date; Review court order re summary disposition procedure; Research the same; Communicate with opposing counsel re bankruptcy	6.80	2,006.00
5/30/24	RGW	Prepare proposed scheduling order in Guyon	.60	270.00
5/30/24	LH	Email and call claimants that haven't cashed their distribution checks; Update claims registry and email Jeff Balls re same	.70	164.50
5/31/24	JMC	Correspond with Jeff Balls re default judgments and related issues	.40	184.00
5/31/24	RMB	Prepare Motion to Lift Stay in Andreini II case; Review drafts of default judgments for Andreini II defendants; Review Terri Andreini investment documents to prepare revised settlement offer	1.60	696.00
5/31/24	MJB	(Hafen v. Howell) Correspond with Mea Donnelly (0.1)	.10	42.50
5/31/24	JAB	Draft motions for default; Correspond with defendants; Conference with Joseph Covey	4.50	1,777.50
5/31/24	CMM	Draft meet and confer letter related to deficient discovery; Draft complaint and letter ending tolling agreement; Communicate with potential claw back defendant re the same	2.40	708.00
5/31/24	TMM	Review and revise Attorney Planning report and response to counterclaim	1.10	495.00
6/03/24	JMC	Review numerous docket entries on new filings and deadlines in ancillary matters	.20	92.00
6/03/24	MJB	(Hafen v. Howell) Correspond with Michael Harris (0.1)	.10	42.50
6/03/24	JAB	Review settlement status; Draft status reports; Finalize motion for default judgment; Correspond with opposing counsel; Conference with Robert Wing and Tom Melton; Telephone conference with opposing counsel for Birge matter	2.90	1,145.50
6/03/24	CMM	Communicate with potential claw back defendant re settlement; Communicate with Receivership team re the same; Draft meet and confer for claw back action; Communicate with Parr Brown attorneys re the same; Draft initial disclosures in claw back action; Review scheduling order and communicate with opposing counsel re responses to discovery requests	6.60	1,947.00
6/03/24	RGW	Work on Oberhansly discovery issues; Email with Tom Melton re Guyon	1.10	495.00
6/03/24	TMM	Telephone conference with Robert Wing and Jeff Balls re Call; email to opposing counsel re Attorney Planning Meeting report; review Call documents re financial condition	3.10	1,395.00

PARR BROWN GEE & LOVELESS

Invoice: 949482
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2024
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Matter: 2

Date	Tkpr	Description	Hours	Amount
6/03/24	LH	Read and respond to emails from claimants re taxes and distributions in 2023; Email Jeff Balls re same; Run military service searches for each day of the birth month for claimants and download certificates re military status; Document management; Communicate with claimants re mailing addresses for renewed distribution check mailings	2.00	470.00
6/04/24	RMB	Conference with Jeff Balls re Rico investor group status; Review files for Rico investor group in connection with preparation of motion for default judgment	.60	261.00
6/04/24	MJB	(Hafen v. Howell) Correspond with Tony Erives (0.1); Conference with Jeff Balls (0.1)	.20	85.00
6/04/24	JAB	Review court orders; Correspond with Tom Melton; Draft applications for default	.90	355.50
6/04/24	CMM	Draft meet and confer letter in Oberhansly matter; Communicate with Robert Wing re the same; Communicate with Joe Covey and Micheal Hoppe re Darren Nelson bankruptcy matter; Review option filed by trustee in the same; Communicate with opposing counsel re discovery deadlines	7.80	2,301.00
6/04/24	TMM	Review documents re Call litigation; telephone call with Robert Wing re same	2.50	1,125.00
6/05/24	MJB	(Hafen v. Howell) Correspond with Mari Arnold (0.1)	.10	42.50
6/05/24	JAB	Draft motions for default; Call Ryan Pahnke; Draft motion to extend scheduling order; Review communications on receiver website; Review court order; Telephone conference with Ryan Pahnke; Correspond with Jonathan Hafen re settlement; Correspond with Steven Waterman	4.70	1,856.50
6/05/24	CMM	Attorney conference with Robert Wing re discovery in Oberhansly matter; Draft meet and confer communication; Research and draft complaint	7.20	2,124.00
6/05/24	RGW	Call with Tom Melton re cash recipients and Call matters; Call with Claire McGuire re discovery issue in Oberhansly	.30	135.00
6/05/24	TMM	Review documents in Call Group; review pleadings in Wheeler and Didonato pleadings; telephone conference with Robert Wing re same; revise and file Guyon Answer to Counterclaim	3.10	1,395.00
6/05/24	LH	Military searches and document management re same; Discuss same with Jeff Balls	.60	141.00
6/06/24	JMC	Correspond with Jeff Balls and Claire McGuire re Larsen matter; Correspond with Jeremy Sink re Darren Nelsen case	.30	138.00
6/06/24	MJB	(Hafen v. Howell) Correspond with Mea Donnelly (0.1)	.10	42.50
6/06/24	JAB	Telephone conference with Robert Wing and Tom Melton; Correspond with defendants re matters; Draft motion to extend deadlines; Email Ryan Pahnke re amended scheduling order and settlement; Correspond with Steven Waterman; Conference with Rodger Burge; Telephone conference with Jeff Shaw	5.20	2,054.00

PARR BROWN GEE & LOVELESS

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Asset Analysis & Recovery

July 15, 2024
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
6/06/24	CMM	Revise and send meet and confer letter to Oberhansly counsel; Review Reply and opposition in Larsen claw back; Communicate with Parr Brown team re the same; Communicate with opposing counsel and Parr Brown team re extension of fact discovery and new counsel	6.30	1,858.50
6/06/24	RGW	Research re jury trial right in Guyon matter; Email to Tom Melton re same; Call with Jeff Shaw re evidence in cash recipients matter	1.80	810.00
6/06/24	TMM	Review remaining asset recovery cases; conference with Robert Wing and Jeff Balls	1.30	585.00
6/07/24	JMC	Review deadlines in various ancillary proceedings	.30	138.00
6/07/24	MTH	Review correspondence re Nelson matter and correspond with Claire McGuire re same	.20	86.00
6/07/24	MTH	Review and respond to correspondence from Claire McGuire re Nelson matter	.10	43.00
6/07/24	JAB	Draft default judgments; Correspond with Jeff Shaw; Conference with Rodger Burge; Analyze accounting; Correspond with Robert Wing; Review order assigning claim to Zions and limiting distribution amount; Correspond with Steve Waterman; Telephone conference with Jim Harward; Review reply in support of motion for summary judgment for Larsen; Conference with Claire McGuire	3.80	1,501.00
6/07/24	CMM	Review reply and opposition in Larsen claw back; Draft overview for and communicate with Joseph Covey and Jeffery Balls re the same; Research prejudice in the context of Rule 6 motions; Communicate with opposing counsel re discovery cut off	9.10	2,684.50
6/07/24	RGW	Review cash recipients documents; Prepare letter re same; Emails with Jeff Balls and Tom Melton re same	2.30	1,035.00
6/07/24	TMM	Review documents in recovery cases; review offers; analyze Call matter	2.10	945.00
6/08/24	JAB	Correspond with group re bankruptcy matters	.10	39.50
6/10/24	MTH	Review correspondence re summary judgment motion in Larsen matter	.10	43.00
6/10/24	MTH	Review and respond to correspondence from Claire McGuire re motion for summary judgment in Larsen case	.10	43.00
6/10/24	MTH	Correspond with Claire McGuire re Larsen SJ motion	.10	43.00
6/10/24	JAB	Correspond with team re litigation matters; Conference with Tom Melton	2.90	1,145.50
6/10/24	RGW	Emails and call with Tom Melton re Wheeler matter; Email to Jonathan Hafen re Donovan	.30	135.00
6/10/24	TMM	Review Wheeler documents; review answer; telephone conversation with Robert Wing, Jeff Balls; prepare recommendation re strategy	2.90	1,305.00
6/11/24	JMC	Correspond with Michael Hoppe, Claire McGuire and Jeff Balls re the Larsen, Flint and Nielson matters and other items; Review correspondence from Claire McGuire re summary judgment	1.60	736.00
6/11/24	MTH	Meeting with Joe Covey, Claire McGuire and Jeff Balls re Larsen case and Nelson case	.80	344.00
6/11/24	MTH	Review correspondence from Jeff Balls re settlement strategy in Larsen matter	.10	43.00

PARR BROWN GEE & LOVELESS

Invoice: 949482
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2024
Client: 176430
Matter: 2

Date	Tkpr	Description	Hours	Amount
6/11/24	JAB	Conference with Claire McGuire, Joseph Covey, and Michael Hoppe; Telephone conference with James Tracy	2.80	1,106.00
6/11/24	WOP	Call with Cheri re purchase of music catalog; Review records re same; Review purchase agreement	2.30	724.50
6/11/24	CMM	Attorney conference with Mike Hoppe, Joe Covey and Jeff Balls re various claw back actions and settlement negotiations; Review communication to opposing counsel; Draft settlement communication; Draft termination of tolling agreement	3.70	1,091.50
6/12/24	JMC	Review and analyze settlement offer; Correspond with Jeff Balls re the same; Correspond with James Tracy re settlement	.80	368.00
6/12/24	JAB	Correspond with defendant re ability to pay	2.50	987.50
6/12/24	RGW	Call with Tom Melton and Jonathan Hafen	.20	90.00
6/13/24	JAB	Correspond with group re reasonably equivalent value; Telephone conference with Jim Harward; Conference with Joseph Covey, Tom Melton, and Robert Wing	3.50	1,382.50
6/13/24	RGW	Attend Guyon initial planning meeting; Call with Jeffery Balls and Tom Melton re remaining matters	.60	270.00
6/13/24	TMM	Email re Wheeler estate, telephone conference re same; attorney planning meeting with opposing counsel in Guyon	.70	315.00
6/14/24	JMC	Correspond with Jeff Balls re ancillary proceeding	.10	46.00
6/14/24	JAB	Review clawback actions; Correspond with Jim Harward re settlement	3.10	1,224.50
6/14/24	CMM	Communicate with Parr Brown team re settlement offer from potential claw back defendant; Communicate re the same with defendant; Research issue of burden shifting related to rare metals; Communicate with metals expert re valuation for remaining pieces	6.60	1,947.00
6/17/24	JMC	Review dates for action in various clawback actions; Correspond with Jeff Balls re Larsen case	.30	138.00
6/17/24	JAB	Review claw back matters; Draft motion to substitute party; Draft motions for default judgment; Correspond with Jeff Shaw; Correspond with Ryan Pahnke re settlement	4.20	1,659.00
6/17/24	TMM	Prepare Stipulated Motion to Dismiss; telephone conference with opposing counsel; emails re same	1.50	675.00
6/17/24	TMM	Revise Attorney Planning Report to incorporate opposing counsel changes; draft Stipulated Motion for Scheduling Order; review and revise scheduling order; telephone conference with opposing counsel re changes and approval	3.10	1,395.00
6/18/24	JAB	Correspond with Judson Pitts	1.40	553.00
6/18/24	AB	Conference with Jeffery Balls re probate search for investor	.10	21.50
6/20/24	JAB	Telephone conference with Steve Waterman; Call Judson Pitts	.70	276.50
6/21/24	JAB	Revise affidavit of Jeff Shaw; Correspond with Jeff Shaw re same; Draft proposed scheduling order and attorney planning meeting report; Telephone conference with defendant; Review cease and desist notice for Howell	3.90	1,540.50

PARR BROWN GEE & LOVELESS

Invoice: 949482
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2024
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Matter: 2

Date	Tkpr	Description	Hours	Amount
6/21/24	CMM	Attorney conference with Robert Wing re motion to compel; Research and draft short form motion to compel	3.40	1,003.00
6/21/24	RGW	Conference with Claire McGuire re Oberhansly; Analyze Oberhansly discovery issues	.30	135.00
6/24/24	JMC	Review numerous scheduling dates in ancillary proceedings	.20	92.00
6/24/24	MJB	(Hafen v. Howell) Correspond with Michael Harris (0.1)	.10	42.50
6/24/24	JAB	Draft motions for default; Telephone conference with Judson Pitts; Telephone conference with Nate Freeman; Draft motion for extension of time; Review motion to withdraw as counsel; Correspond with Judson Pitts re same; Review documents; Email Jim Harward re settlement	5.60	2,212.00
6/24/24	RGW	Call with Tom Melton re Donovan matter; Email to Tom Melton re same; Emails with opposing counsel re Woodfin	.50	225.00
6/24/24	LH	Read and respond to email from claimant re cashing check issue; Email to Jeff Balls re same; Run military searches on Ben Wade and Brad Wade and download military status reports and document management re same	1.00	235.00
6/25/24	JAB	Review notice of oral argument; Conference with Matt Ball; Draft filing for oral argument; Review pleadings	1.00	395.00
6/26/24	MJB	(Hafen v. Howell) Correspond with Joe Covey (0.1)	.10	42.50
6/26/24	JAB	Review pleadings; Telephone conference with Jim Harward; Conference with Rodger Burge; Correspond with Ryan Pahnke	2.10	829.50
6/26/24	RGW	Analyze issues re statement of discovery issues in Oberhansly	.30	135.00
6/27/24	JMC	Review and analyze Gretchen Howell bankruptcy filing and options; Review bankruptcy code for non-discharge provisions	2.80	1,288.00
6/27/24	JAB	Draft default documents; Review investor summaries; Conference with Joseph Covey; Telephone conference with Ryan Pahnke; Draft attorney planning meeting report and proposed scheduling order; Call defendants re scheduling order	4.10	1,619.50
6/27/24	NR	Meet with Joe Covey to discuss the case and research question	.40	102.00
6/28/24	JMC	Correspond with Jeff Balls and local Arizona counsel re Howell bankruptcy, appeal and related issues; Research bankruptcy non-discharge issues; Review notice of bankruptcy for appeal	1.50	690.00
6/28/24	JAB	Review Gretchen Howell bankruptcy issues; Call defendant re scheduling order; Draft motion for entry of scheduling order; Draft notice of bankruptcy; Conference with Joseph Covey	4.10	1,619.50
6/28/24	NR	Research dischargability of a debt that arises out of ponzi scheme winners even if they are innocent of fraud themselves	1.60	408.00
6/28/24	TMM	Draft motion to amend scheduling order; review order re same	.30	135.00
6/28/24	TMM	Review and revise amendment to scheduling order	.30	135.00
		TOTAL PROFESSIONAL SERVICES		**$ 165,815.00**

PARR BROWN GEE & LOVELESS

Invoice: 949482
Rust Rare Coin Receivership
Asset Analysis & Recovery

July 15, 2024
Client: 176430
Matter: 2

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	460.00	27.00	12,420.00
Rodger M Burge	435.00	5.60	2,436.00
Michael T Hoppe	430.00	5.40	2,322.00
Matthew J Ball	425.00	3.90	1,657.50
Jeffery A Balls	395.00	136.60	53,957.00
Walter O Peterson	315.00	4.80	1,512.00
Claire M McGuire	295.00	237.80	70,151.00
Thomas M Melton	450.00	23.00	10,350.00
Robert G Wing	450.00	16.90	7,605.00
Nathan Rich	255.00	2.00	510.00
Lori Henry - Paralegal	235.00	7.80	1,833.00
Amanda Bradley - Paralegal	215.00	.10	21.50
Crista Yancey - Paralegal	200.00	5.20	1,040.00
TOTALS		**476.10**	**$ 165,815.00**

COSTS ADVANCED

Date	Description	Amount
4/08/24	US Marshal Service - execution fee (Hafen v. Howell)	1,800.00
4/24/24	SimpleCertified Mail	8.90
5/31/24	May 2024 Westlaw charges	98.97

TOTAL COSTS ADVANCED **$ 1,907.87**

TOTAL THIS INVOICE **$ 167,722.87**

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

July 15, 2024

Invoice: 949482
Client: 176430
Matter: 2

REMITTANCE ADVICE

RE: Asset Analysis & Recovery

BALANCE DUE THIS INVOICE **$ 167,722.87**

Please return this advice with payment to:

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

Wire Transfer Instructions

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

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

E-Check

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

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

Please reference your invoice # 949482

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

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

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

July 15, 2024

Invoice: 949485
Client: 176430
Matter: 5

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Claims Administration

Professional Services	$ 4,758.00
Total Costs Advanced	$ .00
TOTAL THIS INVOICE	**$ 4,758.00**

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

PARR BROWN GEE & LOVELESS

Invoice: 949485
Rust Rare Coin Receivership
Claims Administration

July 15, 2024
Client: 176430
Matter: 5

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/05/24	CMM	Communicate with CFTC and Parr Brown Team re calculating restitution and data needed to do the same	.60	177.00
4/08/24	CMM	Communicate with CFTC and BRG re issues for investment summary and restitution calculation	1.10	324.50
4/10/24	JAB	Correspond with claimants; Telephone conference with claimants	.70	276.50
4/12/24	JAB	Telephone conference with claimants	.80	316.00
4/15/24	JAB	Correspond with claimants	.50	197.50
4/16/24	JAB	Review bank account; Correspond with Lori Henry	1.10	434.50
4/16/24	LH	Telephone conference with personal representative of deceased estate; Email with Jeffery Balls re same: Update registry	.10	23.50
4/22/24	JAB	Review bank account; Review claims; Review correspondence to receivership website	.70	276.50
4/23/24	JAB	Review claims; Coordinate payment of taxes	.60	237.00
5/03/24	JAB	Review bank account; Coordinate with Lori Henry	.50	197.50
5/03/24	LH	Communicate with claimants re checks received and future distributions; Communicate with Jeff Balls re same; Document management re same	.50	117.50
5/22/24	JAB	Correspond with claimants	.60	237.00
5/30/24	JAB	Review outstanding checks; Telephone conference with claimants	.80	316.00
6/03/24	JAB	Correspond with Lori Henry re claimants questions; Review bank account	.50	197.50
6/04/24	JAB	Review bank account; Reissue checks; Draft motion to court re Zions claim; Call claimants re distribution; Telephone conference with Steve Waterman	2.40	948.00
6/04/24	LH	Read and respond to claimants' emails re address changes; Email Jeff Balls re same	.20	47.00
6/20/24	JAB	Process claim for Zions Bank	.20	79.00
6/25/24	JAB	Review claims status; Review bank account; Review correspondence from claimants; Review receiver website correspondence	.90	355.50

TOTAL PROFESSIONAL SERVICES **$ 4,758.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jeffery A Balls	395.00	10.30	4,068.50
Claire M McGuire	295.00	1.70	501.50
Lori Henry - Paralegal	235.00	.80	188.00
TOTALS		**12.80**	**$ 4,758.00**

TOTAL THIS INVOICE **$ 4,758.00**

PARR BROWN
GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

July 15, 2024

Invoice: 949485
Client: 176430
Matter: 5

REMITTANCE ADVICE

RE: Claims Administration

BALANCE DUE THIS INVOICE **$ 4,758.00**

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 # 949485

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

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

EXHIBIT C

EXHIBIT C

TWENTY-THIRD INTERIM FEE APPLICATION

Time Records of BRG

EXHIBIT C

BRG

INVOICE

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

August 27, 2024
Client-Project: 016222-025457
Invoice #: 10001668
Tax ID: 27-1451273

Via Email: jhafen@parrbrown.com

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

Services Rendered From April 1, 2024 Through June 30, 2024

Professional Services	$	58,172.00	USD
Voluntary Reduction		(937.50)	
Expenses Incurred		138.76	
CURRENT CHARGES	$	**57,373.26**	**USD**

PAYMENT IS DUE BY September 26, 2024

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

Please remit wire/ACH payment to:

Bank Name:	PNC BANK, N.A.
SWIFT:	PNCCUS33
ABA #:	031207607
Account Name:	BERKELEY RESEARCH GROUP, LLC
Account #:	8026286672
Reference:	10001668

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

Please remit check payment to:

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

Please remit express/overnight payment to:

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

BRG

INVOICE

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

Invoice # 10001668
Client-Project: 016222-025457

Services Rendered From April 1, 2024 Through June 30, 2024

PROFESSIONAL SERVICES

	Rate	Hours	Amount
Managing Director			
Vernon Calder	455.00	1.30	591.50
Ray Strong	415.00	0.20	83.00
Associate Director			
Leif Larsen	375.00	32.60	12,225.00
Jeffrey Shaw	375.00	117.10	43,912.50
Jeffrey Shaw	0.00	2.50	N/C
Associate			
Spencer Rawlings	125.00	1.10	137.50
Case Assistant			
Kellee Calder	150.00	0.90	135.00
Yuhao Xu	125.00	1.20	150.00
Total Professional Services		**156.90**	**57,234.50**

EXPENSES
Supplies

Total Expenses	**138.76**

BRG INVOICE

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

Invoice # 10001668
Client-Project: 016222-025457

SUMMARY BY TASK CODE

Task Code	Description	Hours	Amount
300	Claims Process / Distribution	5.40	2,025.00
350	Net Winner / Claims Analysis	3.20	1,200.00
500	Recovery Litigation	96.50	36,195.50
600	Tax Compliance & Analysis	25.80	8,897.50
610	Income Tax Preparation	17.10	6,516.50
710	Criminal Investigation / Law Enforcement Inquiries	6.40	2,400.00
950	Fee Application Preparation & Hearing	2.50	0.00
Total Professional Services		**156.90**	**57,234.50**

BRG INVOICE

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

Invoice # 10001668
Client-Project: 016222-025457

Services Rendered From April 1, 2024 Through June 30, 2024

DETAIL OF PROFESSIONAL SERVICES

Date	Name	Description	Hours	Rate	Amount
Task Code: 300 - Claims Process / Distribution					
04/01/24	Jeffrey Shaw	Follow-up regarding distribution check status.	0.30	375.00	112.50
04/02/24	Jeffrey Shaw	Reviewed distribution check status.	0.50	375.00	187.50
04/03/24	Jeffrey Shaw	Reviewed and updated RRC distribution check status.	1.80	375.00	675.00
04/04/24	Jeffrey Shaw	Reviewed and updated distribution schedules.	1.20	375.00	450.00
04/05/24	Jeffrey Shaw	Reviewed and updated status of Zions distribution checks.	1.60	375.00	600.00
		Total for Task Code 300	**5.40**		**2,025.00**
Task Code: 350 - Net Winner / Claims Analysis					
04/11/24	Jeffrey Shaw	Analyzed investor activity detail and emails regarding the same in connection with counsel inquiry.	3.20	375.00	1,200.00
		Total for Task Code 350	**3.20**		**1,200.00**
Task Code: 500 - Recovery Litigation					
04/02/24	Jeffrey Shaw	Follow-up regarding litigation status and issues.	0.20	375.00	75.00
04/02/24	Jeffrey Shaw	Call with M Hashimoto regarding Larsen litigation.	1.00	375.00	375.00
04/02/24	Jeffrey Shaw	Prepared notes for call with M Hashimoto regarding Larsen litigation.	0.50	375.00	187.50
04/03/24	Jeffrey Shaw	Call with counsel regarding Larsen litigation.	0.90	375.00	337.50
04/03/24	Jeffrey Shaw	Call with BRG regarding Larsen litigation.	0.40	375.00	150.00
04/04/24	Jeffrey Shaw	Discussed litigation status and issues.	0.30	375.00	112.50
04/15/24	Jeffrey Shaw	Call with counsel regarding Larsen litigation.	0.60	375.00	225.00
04/15/24	Jeffrey Shaw	Email to metals expert in connection with Larsen litigation.	0.30	375.00	112.50
04/16/24	Jeffrey Shaw	Emails regarding Larsen litigation with metals expert.	0.30	375.00	112.50
04/29/24	Jeffrey Shaw	Analyzed Larsen ability to pay.	0.90	375.00	337.50
05/01/24	Jeffrey Shaw	Analyzed Olsen investment activity and support.	3.50	375.00	1,312.50
05/01/24	Jeffrey Shaw	Prepared Olsen declaration narrative.	2.20	375.00	825.00
05/02/24	Jeffrey Shaw	Analyzed Olsen transaction data and support.	2.40	375.00	900.00
05/02/24	Jeffrey Shaw	Reviewed, revised, and prepared Olsen declaration narrative.	2.20	375.00	825.00

BRG INVOICE

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

Invoice # 10001668
Client-Project: 016222-025457

Date	Name	Description	Hours	Rate	Amount
Task Code: 500 - Recovery Litigation					
05/02/24	Jeffrey Shaw	Prepared Olsen declaration exhibits.	3.40	375.00	1,275.00
05/03/24	Jeffrey Shaw	Prepared Olsen declaration exhibits.	2.60	375.00	975.00
05/03/24	Jeffrey Shaw	Analyzed Larsen ability to pay analysis.	0.80	375.00	300.00
05/03/24	Jeffrey Shaw	Reviewed and revised Olsen declaration narrative.	1.50	375.00	562.50
05/03/24	Jeffrey Shaw	Finalized Olsen declaration narrative and exhibits and submitted to counsel.	1.30	375.00	487.50
05/06/24	Jeffrey Shaw	Reviewed Larsen Opposition to Motion of Summary Judgment and exhibits.	3.20	375.00	1,200.00
05/06/24	Jeffrey Shaw	Discussion with counsel regarding Larsen litigation.	0.50	375.00	187.50
05/06/24	Jeffrey Shaw	Evaluated Larsen ability to pay analysis.	0.70	375.00	262.50
05/06/24	Jeffrey Shaw	Reviewed Larsen Summary Judgment motion.	2.10	375.00	787.50
05/07/24	Jeffrey Shaw	Discussion with counsel regarding Larsen ability to pay analysis.	0.30	375.00	112.50
05/20/24	Jeffrey Shaw	Follow-up with counsel regarding litigation status.	0.20	375.00	75.00
05/21/24	Jeffrey Shaw	Discussion with tax professionals regarding Larsen tax issues.	0.90	375.00	337.50
05/21/24	Jeffrey Shaw	Call with counsel regarding litigation issues.	0.50	375.00	187.50
05/23/24	Jeffrey Shaw	Call with tax professionals regarding litigation issues.	0.30	375.00	112.50
05/23/24	Jeffrey Shaw	Review and emails regarding Larsen litigation.	0.60	375.00	225.00
05/23/24	Jeffrey Shaw	Reviewed Reply to Opposition of Summary Judgment.	0.90	375.00	337.50
05/24/24	Jeffrey Shaw	Analyzed Receiver's Reply to Opposition of Summary Judgment for Larsen and provided feedback.	2.50	375.00	937.50
05/24/24	Jeffrey Shaw	Call with counsel regarding Larsen litigation/filing.	1.00	375.00	375.00
05/29/24	Jeffrey Shaw	Analyzed investment activity, transactions and support for Fields group net winners.	6.50	375.00	2,437.50
05/30/24	Jeffrey Shaw	Analyzed investment activity, transactions and support for Fields group and prepared response to counsel.	3.00	375.00	1,125.00
06/04/24	Jeffrey Shaw	Analyzed Fields investor activity and support.	1.50	375.00	562.50
06/06/24	Jeffrey Shaw	Review and discussion with counsel regarding litigation issues.	0.30	375.00	112.50
06/06/24	Jeffrey Shaw	Reviewed Taylor ability to pay analysis.	0.90	375.00	337.50
06/06/24	Jeffrey Shaw	Discussion with M Hashimoto regarding Larsen litigation issues.	0.50	375.00	187.50
06/06/24	Jeffrey Shaw	Discussion with counsel regarding Larsen litigation issues.	0.50	375.00	187.50

BRG INVOICE

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

Invoice # 10001668
Client-Project: 016222-025457

Date	Name	Description	Hours	Rate	Amount
Task Code: 500 - Recovery Litigation					
06/07/24	Jeffrey Shaw	Analyzed and reviewed Andreini group investment activity and support.	4.10	375.00	1,537.50
06/07/24	Jeffrey Shaw	Reviewed Fields group investor activity and prepared files for declaration.	1.00	375.00	375.00
06/13/24	Jeffrey Shaw	Follow-up with counsel regarding litigation issues.	0.20	375.00	75.00
06/14/24	Jeffrey Shaw	Analyzed Andreini group investment activity and prepared declaration.	6.10	375.00	2,287.50
06/17/24	Jeffrey Shaw	Analyzed Andreini activity and prepared declaration narrative.	2.90	375.00	1,087.50
06/17/24	Jeffrey Shaw	Reviewed activity and support and prepared investment summary and detail schedules.	3.50	375.00	1,312.50
06/17/24	Jeffrey Shaw	Call with counsel regarding Andreini litigation.	0.20	375.00	75.00
06/18/24	Jeffrey Shaw	Reviewed, revised and prepared Andreini declaration narrative.	2.10	375.00	787.50
06/18/24	Jeffrey Shaw	Reviewed transaction activity and support and prepared Andreini declaration exhibits.	5.30	375.00	1,987.50
06/19/24	Jeffrey Shaw	Reviewed transaction activity and support and prepared Andreini declaration exhibits.	5.40	375.00	2,025.00
06/19/24	Jeffrey Shaw	Reviewed, revised and prepared Andreini declaration narrative.	0.80	375.00	300.00
06/20/24	Jeffrey Shaw	Reviewed transaction activity and support and prepared Andreini declaration exhibits.	6.00	375.00	2,250.00
06/20/24	Jeffrey Shaw	Reviewed and revised Andreini declaration narrative.	0.80	375.00	300.00
06/21/24	Jeffrey Shaw	Reviewed and updated Andreini declaration narrative and exhibits.	4.20	375.00	1,575.00
06/21/24	Jeffrey Shaw	Reviewed, finalized and submitted Andreini declaration narrative and exhibits.	1.50	375.00	562.50
06/21/24	Ray Strong	Analyzed declaration regarding Andreini/Milligan action for finalization.	0.20	415.00	83.00
		Total for Task Code 500	**96.50**		**36,195.50**
Task Code: 600 - Tax Compliance & Analysis					
04/02/24	Jeffrey Shaw	Discussion regarding Receivership tax issues.	0.10	375.00	37.50
04/04/24	Leif Larsen	Prepared first quarter 2024 payroll tax supporting work papers and import files.	2.80	375.00	1,050.00
04/04/24	Jeffrey Shaw	Reviewed outstanding asset balances and discussion with tax professionals regarding the same.	0.90	375.00	337.50
04/04/24	Jeffrey Shaw	Reviewed 2023 cash disbursements per tax professional inquiry.	0.50	375.00	187.50

BRG INVOICE

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

Invoice # 10001668
Client-Project: 016222-025457

Date	Name	Description	Hours	Rate	Amount
Task Code: 600 - Tax Compliance & Analysis					
04/05/24	Leif Larsen	Prepared first quarter 2024 federal payroll tax returns.	2.40	375.00	900.00
04/05/24	Leif Larsen	Prepared first quarter 2024 state payroll tax returns.	1.60	375.00	600.00
04/05/24	Jeffrey Shaw	Review and email regarding tax issues.	0.70	375.00	262.50
04/08/24	Leif Larsen	Worked with the Utah Department of Workforce Services to set up account for the receivership.	2.80	375.00	1,050.00
04/08/24	Leif Larsen	Cleared diagnostics and submitted the first quarter Utah SUTA returns to the proper taxing authority.	1.70	375.00	637.50
04/08/24	Leif Larsen	Cleared diagnostics and submitted the first quarter Utah withholding returns to the proper taxing authority.	1.40	375.00	525.00
04/08/24	Spencer Rawlings	Created Tap account connected to tax withholding account for receivership.	1.10	125.00	137.50
04/09/24	Leif Larsen	Cleared review notes related to the 2023 receivership payroll tax returns.	1.50	375.00	562.50
04/09/24	Jeffrey Shaw	Review and email regarding tax issues.	0.30	375.00	112.50
04/12/24	Jeffrey Shaw	Reviewed tax issues and email regarding the same.	0.60	375.00	225.00
04/15/24	Jeffrey Shaw	Discussions and emails regarding tax issues.	0.70	375.00	262.50
04/22/24	Kellee Calder	Prepared tax returns for submittal to taxing authorities.	0.90	150.00	135.00
04/23/24	Leif Larsen	Reviewed returns to be filed and worked with staff to secure required signatures.	1.60	375.00	600.00
04/23/24	Jeffrey Shaw	Discussion and email regarding tax issues.	0.40	375.00	150.00
04/24/24	Jeffrey Shaw	Discussion regarding tax issues.	0.20	375.00	75.00
04/25/24	Jeffrey Shaw	Follow-up and coordinated review and signing of tax filings.	0.50	375.00	187.50
04/26/24	Jeffrey Shaw	Discussed and coordinated tax document issues.	0.70	375.00	262.50
04/26/24	Yuhao Xu	Delivered tax returns to Receiver for signature.	1.20	125.00	150.00
04/30/24	Jeffrey Shaw	Reviewed tax issues.	0.20	375.00	75.00
05/21/24	Leif Larsen	Analyzed tax issues surrounding potential settlements with net winners.	0.60	375.00	225.00
05/23/24	Leif Larsen	Followed up on tax issues surrounding potential settlements with net winners.	0.40	375.00	150.00
		Total for Task Code 600	**25.80**		**8,897.50**

BRG INVOICE

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

Invoice # 10001668
Client-Project: 016222-025457

Date	Name	Description	Hours	Rate	Amount
Task Code: 610 - Income Tax Preparation					
04/01/24	Leif Larsen	Prepared supporting work papers to be used in the preparation of the 2023 receivership income tax returns.	3.30	375.00	1,237.50
04/02/24	Leif Larsen	Prepared the 2023 receivership federal income tax return.	2.90	375.00	1,087.50
04/02/24	Leif Larsen	Prepared the 2023 receivership state income tax return.	2.90	375.00	1,087.50
04/03/24	Leif Larsen	Researched various 2023 transactions and updated the 2023 receivership supporting work papers and income tax returns.	2.60	375.00	975.00
04/03/24	Leif Larsen	Reviewed and referenced the 2023 receivership supporting work papers and income tax returns.	1.50	375.00	562.50
04/04/24	Leif Larsen	Received additional information regarding 2023 transactions and updated the 2023 receivership supporting work papers and income tax returns.	1.30	375.00	487.50
04/09/24	Vernon Calder	Reviewed IRS Form 941 and related file workpapers.	0.40	455.00	182.00
04/09/24	Vernon Calder	Reviewed 2023 income tax returns and related tax file - Rust Rare Receivership.	0.50	455.00	227.50
04/09/24	Leif Larsen	Cleared review notes related to the 2023 receivership income tax returns.	1.30	375.00	487.50
04/11/24	Vernon Calder	Verified clearance of review notes on 2023 income tax returns and 2024 First Quarter Payroll tax returns.	0.20	455.00	91.00
04/22/24	Vernon Calder	Verified clearance of review notes on 2024 payroll tax returns and 2023 income tax returns.	0.20	455.00	91.00
		Total for Task Code 610	**17.10**		**6,516.50**
Task Code: 710 - Criminal Investigation / Law Enforcement Inquiries					
04/16/24	Jeffrey Shaw	Reviewed CFTC request and call with counsel regarding the same.	1.20	375.00	450.00
04/17/24	Jeffrey Shaw	Reviewed and prepared investor summary schedule in connection with CFTC inquiry.	3.10	375.00	1,162.50
04/17/24	Jeffrey Shaw	Reviewed, finalized and submitted investor schedule and email regarding the same.	1.30	375.00	487.50
04/18/24	Jeffrey Shaw	Reviewed and updated investor schedule for CFTC per counsel request.	0.80	375.00	300.00
		Total for Task Code 710	**6.40**		**2,400.00**
Task Code: 950 - Fee Application Preparation & Hearing					
04/25/24	Jeffrey Shaw	[NC] Reviewed and revised time entries and descriptions for Jan-Mar bill.	1.00	0.00	0.00

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Invoice # 10001668
Client-Project: 016222-025457

Date	Name	Description	Hours	Rate	Amount
Task Code: 950 - Fee Application Preparation & Hearing					
05/21/24	Jeffrey Shaw	[NC] Reviewed, finalized and submitted Q1 bill.	0.50	0.00	0.00
05/21/24	Jeffrey Shaw	[NC] Prepared Q1 fee application narrative.	1.00	0.00	0.00
		Total for Task Code 950	**2.50**		**0.00**
Professional Services			**156.90**		**57,234.50**

EXHIBIT D

EXHIBIT D

TWENTY-THIRD 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

May 06, 2024
Client: PA123
Matter: 00007
Invoice #: 1304306

Page: 1

RE: Jonathan Hafen v. Leslie & Gretchen Howell

For Professional Services Rendered Through April 30, 2024

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
04/05/2024	MMD	Email correspondence with attorney Harris regarding deposit for use of US Marshal's (.1); email correspondence with client regarding the same (.1).	0.20	$300.00	$60.00
04/16/2024	MMD	Phone call with U.S. Marshal's office (.1); email correspondence with client providing update on status (.1).	0.20	$300.00	$60.00
04/17/2024	MJH	Reviewed and responded to email re writ and seizure.	0.20	$395.00	$79.00
04/17/2024	MMD	Phone call with U.S. Marshal's office (.1); email correspondence with attorney Harris regarding U.S. Marshal follow-up question prior to seizure of properties (.1).	0.20	$300.00	$60.00
04/19/2024	MJH	Research re properties and telephone call with US Marshal's office re same.	0.30	$395.00	$118.50
04/22/2024	MMD	Email correspondence with attorney Harris regarding homestead exemption (.1).	0.10	$300.00	$30.00
04/23/2024	MJH	Telephone call and conference with M. Donnelly and U.S. Marshal and review of Mohave records re legal descriptions.	0.70	$395.00	$276.50
04/23/2024	MMD	Call with US Marshall's office regarding Parcel 1 (.3); office conference with attorney Harris regarding next steps (.1); analyze Mohave county recorder and assessors website to determine how to split 92A, B, and C properties for amended writ of execution(.6); email correspondence with attorney Harris regarding findings (.2).	1.20	$300.00	$360.00

SacksTierney P.A.
ATTORNEYS

May 06, 2024
Client: PA123
Matter: 00007
Invoice #: 1304306

SERVICES

Date		Description of Services	Hours	Rate	Amount
04/24/2024	MJH	Prepared for and participated in telephone call with clients re enforcement strategy, including research re homestead act.	0.90	$395.00	$355.50
04/24/2024	MMD	Draft amended writ of execution (.3); email correspondence with attorney Harris regarding the same (.1); phone call with client regarding US Marshall's questions and Parcel 92 (.4); office conference with attorney Harris regarding next steps (.1); email correspondence with attorney Harris regarding Parcel 92 and its access ability (.2).	1.10	$300.00	$330.00
04/25/2024	MJH	Prepared for and participated in telephone call with U.S. Marshal office re additional issues prior to sale.	0.70	$395.00	$276.50
04/25/2024	MMD	Phone call with US Marshall regarding follow-up questions (.3).	0.30	$300.00	$90.00
04/29/2024	MJH	Exchanged emails and telephone calls re updating forms and next steps.	0.20	$395.00	$79.00
04/29/2024	MMD	Office conference with attorney Harris regarding new US285s (.1); draft updated US285s for all four properties(.4); email correspondence regarding the same with attorney Harris (.1).	0.60	$300.00	$180.00
		Total Professional Services	6.90		$2,355.00

SUMMARY

		Hours	Rate	Amount
MJH	Michael J. Harris	3.00	$395.00	$1,185.00
MMD	Mea M. Donnelly	3.90	$300.00	$1,170.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
04/30/2024	Administrative Expense	$117.75
	Total Disbursements	$117.75

SacksTierney P.A.
ATTORNEYS

May 06, 2024
Client: PA123
Matter: 00007
Invoice #: 1304306

Total Services	$2,355.00	
Total Disbursements	$117.75	
Total Current Charges		$2,472.75
Previous Balance		$7,543.77
Current Interest		$54.16
PAY THIS AMOUNT		**$10,070.68**

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

June 17, 2024
Client: PA123
Matter: 00007
Invoice #: 1306243

Page: 1

RE: Jonathan Hafen v. Leslie & Gretchen Howell

For Professional Services Rendered Through May 31, 2024

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
05/01/2024	MMD	Draft all four notice of sale on writ of execution for each parcel to be auctioned individually (1.1); email correspondence with attorney Harris regarding the same (.1).	1.20	$300.00	$360.00
05/07/2024	MJH	Reviewed Notices of Sale and exchanged email re 285s.	0.50	$395.00	$197.50
05/07/2024	MMD	Email correspondence with US Marshal regarding notice of sales (.2).	0.20	$300.00	$60.00
05/08/2024	MMD	Draft Motion to extend effectiveness and deadline for return of writ of execution (.9); email correspondence with attorney Harris regarding the same (.1); update all 4 Notice of Sales for US Marshal change (.1); email correspondence with US Marshal regarding updated versions and motion to extend (.1).	1.20	$300.00	$360.00
05/09/2024	MJH	Reviewed Motion to Extend and emails re same and notices of sale.	0.20	$395.00	$79.00
05/09/2024	MMD	Office conference with S. Harl regarding Motion to Extend (.1); draft order regarding extension of writ (.3); email correspondence with S. Harl regarding filing of the same (.1).	0.50	$300.00	$150.00
05/10/2024	MMD	Email correspondence with client regarding bids for US 285s (.1); email correspondence with US Marshal regarding status of Motion (.1).	0.20	$300.00	$60.00
05/15/2024	MMD	Analyze Mohave county recorder and assessor to determine value or remaining three properties (.4); email correspondence with client regarding the same (.1).	0.50	$300.00	$150.00

SacksTierney P.A.
ATTORNEYS

June 17, 2024
Client: PA123
Matter: 00007
Invoice #: 1306243

SERVICES

Date		Description of Services	Hours	Rate	Amount
05/16/2024	MJH	Reviewed Revised 285s.	0.20	$395.00	$79.00
05/16/2024	MMD	Email correspondence with client confirming receipt of bids (.1); update 4 US 285s for client starting bids (.3); email correspondence with attorney Harris regarding the same (.1); email correspondence with US Marshal regarding Notice of Sale edits and updated 285s (.2).	0.70	$300.00	$210.00
05/20/2024	MMD	Email correspondence with attorney Harris regarding 285s and Notice of sale changes (.1); update 4 notice of sales for US Marshal's edits (.2); sign and finalize 4 US285s (.2); email correspondence with U.S. Marshal Regarding the same (.1).	0.60	$300.00	$180.00
05/29/2024	MMD	Email correspondence with client regarding US Marshal follow-ups for auction (.2).	0.20	$300.00	$60.00
05/31/2024	MMD	Email correspondence with attorney Harris regarding client's question (.1).	0.10	$300.00	$30.00
		Total Professional Services	6.30		$1,975.50

SUMMARY

		Hours	Rate	Amount
MJH	Michael J. Harris	0.90	$395.00	$355.50
MMD	Mea M. Donnelly	5.40	$300.00	$1,620.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
05/31/2024	Administrative Expense	$98.78
	Total Disbursements	$98.78

Total Services	$1,975.50	
Total Disbursements	$98.78	
Total Current Charges		$2,074.28
Previous Balance		$10,070.68
Current Interest		$62.54
Less Credits/Write Offs		*($93.35)*
PAY THIS AMOUNT		**$12,114.15**

SacksTierney P.A.
ATTORNEYS

June 17, 2024
Client: PA123
Matter: 00007
Invoice #: 1306243

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

July 15, 2024
Client: PA123
Matter: 00007
Invoice #: 1306902

Page: 1

RE: Jonathan Hafen v. Leslie & Gretchen Howell

For Professional Services Rendered Through July 12, 2024

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
06/03/2024	MMD	Email correspondence with client regarding credit bid (.1); email correspondence with US Marshal regarding questions for auction (.1).	0.20	$300.00	$60.00
06/24/2024	MJH	Reviewed bankruptcy docket and letter, conference with J. Samuelson re same, and analyzed next steps.	1.20	$395.00	$474.00
06/24/2024	JSS	Confer with attorney M. Harris re: recent bankruptcy case; review docket.	0.30	$400.00	$120.00
06/26/2024	JSS	Review docket, cease and desist letter and related information; email to attorney M. Harris re: summary and next steps.	1.00	$400.00	$400.00
06/27/2024	JSS	Emails re: application of automatic stay to appeal brought by debtor.	0.60	$400.00	$240.00
06/27/2024	MMD	Draft Motion to Quash Writ of Execution (.6); draft Order to Quash Writ of Execution (.5); email correspondence to Attorney Harris regarding same (.1).	1.20	$300.00	$360.00
06/28/2024	MJH	[NO CHARGE] Prepared for and participated in video-conference with clients and co-counsel re bankruptcy and next steps.	1.00	$0.00	$0.00
06/28/2024	JSS	Review docket; attend zoom call with attorney's J. Covey, M. Ball and M. Harris, re: 10th circuit appeal, lift stay, adversary proceeding, background, judgment, plan, sale, timelines and other related issue; instructions to legal assistant re: NOA; confer with Harris re: file.	1.20	$400.00	$480.00
07/01/2024	MJH	Reviewed letter to US Marshal and Motion and Order to Quash Writ.	0.40	$395.00	$158.00

SacksTierney P.A.
ATTORNEYS

July 15, 2024
Client: PA123
Matter: 00007
Invoice #: 1306902

SERVICES

Date		Description of Services	Hours	Rate	Amount
07/02/2024	MMD	Analyze local rules of procedure for Arizona District Court for Motion to Quash (.3); revise proposed order based on same, email correspondence with Attorney Harris regarding same (.2).	0.50	$300.00	$150.00
07/08/2024	MMD	Email correspondence with S. Harl, L. Simonini, and Attorney Harris regarding Motion to Quash and Order, analyze drafts to file (.2).	0.20	$300.00	$60.00
		Total Professional Services	7.80		$2,502.00

SUMMARY

		Hours	Rate	Amount
MJH	Michael J. Harris	1.00	$0.00	$0.00
MJH	Michael J. Harris	1.60	$395.00	$632.00
JSS	James Scott Samuelson	3.10	$400.00	$1,240.00
MMD	Mea M. Donnelly	2.10	$300.00	$630.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
06/30/2024	Administrative Expense	$106.70
	Total Disbursements	$106.70

Total Services	$2,502.00	
Total Disbursements	$106.70	
Total Current Charges		$2,608.70
Previous Balance		$12,114.15
Less Payments		*($7,504.58)*
PAY THIS AMOUNT		**$7,218.27**

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

EXHIBIT E

EXHIBIT E

TWENTY-THIRD INTERIM FEE APPLICATION

Proposed Order

EXHIBIT E

Joseph M.R. Covey (7492) (jcovey@parrbrown.com)
Jeffery A. Balls (12437) (jballs@parrbrown.com)
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Attorneys for Jonathan O. Hafen as Receiver

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

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

Before the Court is the twenty-third interim fee application (the "Fee Application"), submitted by Jonathan O. Hafen in his capacity as the Court-Appointed Receiver for Rust Rare

Coin Inc., Gaylen Dean Rust, R Legacy Racing Inc., R Legacy Entertainment LLC, R Legacy Investments LLC, Denise Gunderson Rust, and Joshua Daniel Rust (collectively, "Defendants") seeking approval by the Court for the fees and expenses incurred by the Receiver; the Receiver's counsel, Parr Brown Gee & Loveless ("Parr Brown"), Sacks Tierney P.A. ("Arizona Counsel"), and the Receiver's accountants, Berkeley Research Group ("BRG"), for the period of April 1, 2024, through June 30, 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:	$18,336.00 for fees and expenses.
b.	Parr Brown:	$180,011.81 for fees and expenses.
c.	BRG:	$57,373.26 for fees and expenses.
d.	Arizona Counsel:	$7,155.73 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 September 2024.

Honorable Dustin B. Pead
United States Magistrate Judge