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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-FOURTH 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-fourth 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 July 1, 2024, through September 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-Fourth Quarterly Status Report*, which includes a status report for the period of July 1, 2024, through September 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.

[1] Docket No. 556 filed October 31, 2024.

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

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

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

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

IV. SUMMARY OF AMOUNTS REQUESTED

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

a. Receiver: From July 1, 2024, through September 30, 2024, the Receiver billed a total of 57.6 hours for services to the Receivership Estate. The Receiver is seeking

approval for the payment of fees and expenses totaling $27,648.00. *See* **Exhibit A**.

b. Parr Brown: From July 1, 2024, through September 30, 2024, Parr Brown billed a total of 590.9 hours for legal services to the Receivership Estate. Parr Brown is seeking approval for the payment of fees and expenses totaling $225,954.47. *See* **Exhibit B**. These amounts include a voluntary write down of $12,445.00.

c. BRG: From July 1, 2024, through September 30, 2024, BRG billed a total of 241.4 hours providing forensic, tax, and general accounting services to the Receivership Estate. BRG is seeking approval for the payment of fees and expenses totaling $88,069.50. *See* **Exhibit C**. These amounts include a voluntary write down of $2,362.50.

d. Arizona Counsel: From July 1, 2024, through September 30, 2024, Arizona Counsel billed a total of 70.4 hours for legal services to the Receivership Estate. Arizona Counsel is seeking approval for the payment of fees and expenses totaling $27,789.00. *See* **Exhibit D**.

11. The amounts requested reflect a total of $14,805.50 in voluntary reductions by the respective professionals in an exercise of their billing judgment.

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

V. SUMMARY OF EXHIBITS

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

described below.

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

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

Exhibit A—Time Records of Receiver

Exhibit A Summary by Task

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

Exhibit A-1 Administration of Receivership Estate

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

Exhibit A-2 Asset Analysis and Recovery

18. The Receiver worked closely with his legal counsel during the Application Period in negotiating favorable settlement agreements with net winners. These settlement efforts involved extensive coordination with the Receiver's counsel and required the Receiver to review the supporting documentation and settlement agreements before their execution. The Receiver also worked with his legal counsel in several litigation matters with Claw Back Defendants. The Receiver continued coordinating with investors and their counsel to substantiate various metal

transactions that were associated with such investors.

Exhibit B-Time Records of Parr Brown

Exhibit B Summary by Task

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

Exhibit B-1 Administration of Receivership Estate

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

Exhibit B-2 Asset Analysis & Recovery

21. During the Application Period, Parr Brown continued to work the numerous claw back actions filed against scores of investors (the "Claw Back Defendants"). Parr Brown also continued working with the many potential net winners (the "Net Winners") with whom they executed tolling agreements in order to facilitate further discussions and negotiations regarding their transactions with the Receivership Defendants. As a result of the Court granting the Receiver's Motion for Settlement Authority (*See* Dkt. No. 271), and the Receiver's ongoing settlement efforts, the Receiver recovered approximately $5,900,000 in claw back negotiations during this last quarter. 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

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

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 and researched tax issues in conjunction with litigation settlements and met with and provided information to the Receiver regarding these issues.

31. BRG reviewed, prepared, and submitted the required filings for the federal payroll tax returns for Q2 2024 in connection with the distributions made related to the wage claims of former employees of Rust Rare Coin. BRG also contacted and followed up with the Utah Department of Workforce Services and local taxing authorities regarding filing requirements.

Exhibit D-Time Records of Arizona Counsel

32. As a result of the Receiver's and his team's clawback efforts, the Receiver previously secured a judgment in favor of the Receivership Estate against net winners who own real property in the State of Arizona. The Receiver engaged Arizona Counsel to advise the

Receiver and take the steps necessary under Arizona law to foreclose on the real property. Arizona Counsel previously initiated foreclosure proceedings which were stifled due to the filing of a bankruptcy by the net winners. Arizona Counsel is currently working with the Receiver and his team to have the bankruptcy dismissed so that the foreclosure proceedings can move forward.

VI. PRIOR REQUESTS AND INTERIM NATURE OF REQUEST

33. 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, 544 and 554. This is the Twenty-Fourth Interim Fee Application of the Receiver and his professionals. The Receiver and his professionals understand that the authorization and payment of fees and expenses is interim in nature. All fees and expenses allowed on an interim basis will be subject to final review at the close of the case and the discharge of the Receiver when the Receiver files a final accounting and the Receiver and his professional's file final fee applications.

[2] The Receiver's First Interim Fee Application was filed on February 22, 2019. *See* Dkt. No. 120. The Receiver's Second Interim Fee Application was filed on May 24, 2019. *See* Dkt. No. 187. The Receiver's Third Interim Fee Application was filed on September 4, 2019. *See* Dkt. No. 241. The Receiver's Fourth Interim Fee Application was filed on December 31, 2019. *See* Dkt. No. 274. The Receiver's Fifth Interim Fee Application was filed on March 10, 2020. *See* Dkt. No. 292. The Receiver's Sixth Interim Fee Application was filed on August 7, 2020. *See* Dkt. No. 333. The Receiver's Seventh Interim Fee Application was filed on November 13, 2020. *See* Dkt. No. 367. The Receiver's Eighth Interim Fee Application was filed on January 15, 2021. *See* Dkt. No. 382. The Receiver's Ninth Interim Fee Application was filed on May 27, 2021. *See* Dkt. No. 413. The Receiver's Tenth Interim Fee Application was filed on July 6, 2021. *See* Dkt. No. 416. The Receiver's Eleventh Interim Fee Application was filed on October 5, 2021. *See* Dkt. No. 428. The Receiver's Twelfth Interim Fee Application was filed on December 13, 2021. *See* Dkt. No. 434. The Receiver's Thirteenth Interim Fee Application was filed on February 22, 2022. *See* Dkt. No. 442. The Receiver's Fourteenth Interim Fee Application was filed on June 14, 2022. *See* Dkt. No. 461. The Receiver's Fifteenth Interim Fee Application was filed on September 12, 2022. *See* Dkt. No. 481. The Receiver's Sixteenth Interim Fee Application was filed on December 14, 2022. *See* Dkt. No. 488. The Receiver's Seventeenth Interim Fee Application was filed on March 14, 2023. *See* Dkt. No. 494. The Receiver's Eighteenth Interim Fee Application was filed on June 12, 2023. *See* Dkt. No. 508. The Receiver's Nineteenth Interim Fee Application was filed on September 20, 2023. *See* Dkt. No. 516. The Receiver's Twentieth Interim Fee Application was filed on December 13, 2023. *See* Dkt. No. 528. The Receiver's Twenty-First Interim Fee Application was filed on March 13, 2024. *See* Dkt. No. 533. The Receiver's Twenty-Second Interim Fee Application was filed on March 13, 2024. *See* Dkt. No. 543. The Receiver's Twenty-Third Interim Fee Application was filed on September 11, 2024. *See* Dkt. No. 553.

41. For the reasons set forth above, and as supported by the Exhibits attached hereto, the Receiver respectfully submits that the fees and expenses requested herein are for actual services that were necessary for and beneficial to the administration of the Receivership Estate. The Receiver has made every attempt to limit the administrative expenses of the Receivership Estate, and the Receiver submits that given the work that has been performed as reflected in the attached 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 $27,648.00; Parr Brown's fees and expenses in the amount of $225,954.47; BRG's fees and expenses in the amount of $88,069.50; Arizona Counsel's fees and expenses in the amount of $27,789.00, and (ii) authorizing the Receiver to pay these fees and reimburse the expenses from the Receivership Estate once the Receiver has recovered for the Estate at least three times the amount of fees requested in this Fee Application and prior applications.

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 16th day of December 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

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-FOURTH INTERIM FEE APPLICATION** was (1) electronically filed with the Clerk of the Court through the CM/ECF system on December 16, 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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David C. Castleberry OGLETREE DEAKINS NASH SMOAK & STEWART PC 2050 S 1300 E STE 500 SALT LAKE CITY, UT 84106 (801)658-6100 david.castleberry@ogletreedeakins.com	

____/s/ Lori Stumpf_____

EXHIBIT A

EXHIBIT A

TWENTY-FOURTH INTERIM FEE APPLICATION

Time Records of Receiver

EXHIBIT A

PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

October 15, 2024

Invoice: 953705
Client: 177110
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration

Professional Services	$ 5,328.00
Total Costs Advanced	$ .00
TOTAL THIS INVOICE	**$ 5,328.00**

PARR BROWN GEE & LOVELESS

Invoice: 953705 October 15, 2024
Rust Rare Coin Receiver Client: 177110
Administration Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/26/24	JOH	Attention to three clawback actions; Review related documents; Attention to tax matters; Email with accounting firm re same; Review pleadings	1.90	912.00
7/28/24	JOH	Follow up with legal counsel re bankruptcy matter; Review documents	.80	384.00
7/29/24	JOH	Attention to tax matter; Email with accounting team re same; Follow up re tolling agreements; Attention to three clawback actions and potential settlement of same; Review related documents	2.10	1,008.00
8/02/24	JOH	Further attention to gold sale; Attention to discovery matters in clawback action; Call with legal counsel re same; Review pleadings and related documents; Call with clawback defendant; Follow up with legal counsel re same	2.40	1,152.00
8/06/24	JOH	Attention to claim and related clawback action; call with legal counsel re gold sale; Follow up re same; Review purchase agreement	1.40	672.00
8/07/24	JOH	Follow up re gold sale; Email with legal counsel re same; Attention to multiple claims; Review related documents	1.40	672.00
8/08/24	JOH	Follow up re gold purchase; Email with legal counsel re same; Review documents relating to clawback claim and potential settlement of same	1.00	480.00
9/29/24	JOH	Email with E. Moore re background story on ponzi scheme	.10	48.00

TOTAL PROFESSIONAL SERVICES $ 5,328.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	480.00	11.10	5,328.00
TOTALS		**11.10**	**$ 5,328.00**

TOTAL THIS INVOICE $ 5,328.00

PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

October 15, 2024

Invoice: 953705
Client: 177110
Matter: 1

REMITTANCE ADVICE

RE: Administration

BALANCE DUE THIS INVOICE **$ 5,328.00**

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 # 953705

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

October 15, 2024

Invoice: 953706
Client: 177110
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Assett Analysis & Recovery

Professional Services	$ 22,320.00
Total Costs Advanced	$ .00
TOTAL THIS INVOICE	**$ 22,320.00**

Invoice: 953706 October 15, 2024
Rust Rare Coin Receiver Client: 177110
Asset Analysis & Recovery Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/02/24	JOH	Attention to multiple clawback actions; Review related documents, pleadings, and email correspondence; Analyze status of claims process; Follow up with legal counsel re potential settlement of clawback action; Follow up re bankruptcy issue	2.30	1,104.00
7/04/24	JOH	Attention to two clawback actions; Follow up re status of bankruptcy matter; Review documents	1.80	864.00
7/05/24	JOH	Attention to clawback action; Review related email correspondence	.10	48.00
7/11/24	JOH	Attention to eleven clawback actions; Review related documents and email correspondence; Follow up re settlement on additional clawback action	1.30	624.00
7/15/24	JOH	Attention to two clawback actions; meet with legal counsel re various matters	1.00	480.00
7/17/24	JOH	Attention to three clawback actions; Review documents; call with legal counsel re clawback case strategy; Attention to bankruptcy notification; Email with legal counsel re same; Review proposed consent order	2.20	1,056.00
7/18/24	JOH	Attention to potential settlement of clawback action; Email with legal counsel re same; Review documents	1.30	624.00
7/19/24	JOH	Attention to bankruptcy issue in clawback action; Review related documents	1.00	480.00
7/22/24	JOH	Attention to three clawback actions; Review related documents and pleadings; Follow up with legal counsel re two of the clawback actions; Follow up re termination of tolling agreements and related communications	2.10	1,008.00
7/23/24	JOH	Attention to bankruptcy matter; Follow up re potential settlement of two clawback actions; Attention to status of tolling agreements; Review documents	2.40	1,152.00
7/25/24	JOH	Attention to two clawback actions; Email with legal counsel re settlement of clawback action; Review documents	2.70	1,296.00
7/30/24	JOH	Attention to two clawback actions; Review related documents and email correspondence; Review consent order; Email with legal counsel re same; Attention to dispute re tolling agreement; Follow up with legal counsel re same	4.80	2,304.00
7/31/24	JOH	Attention to potential settlement of clawback action; Meet with legal counsel re same; Email with legal counsel re same; Follow up re consent order and receiver's report; Review documents; Follow up re termination of tolling agreements and new complaints to be filed; Review related documents; Review draft settlement documents; Review draft quarterly report and related documents; Email with legal counsel re same; Attention to bankruptcy matter; Review related email correspondence; Review hearing minutes	6.20	2,976.00
8/01/24	JOH	Attention to four clawback actions; call with clawback defendant; Follow up with legal counsel re same; Attention to potential gold sale; Review documents	2.70	1,296.00

PARR BROWN GEE & LOVELESS

Invoice: 953706 October 15, 2024
Rust Rare Coin Receiver Client: 177110
Asset Analysis & Recovery Matter: 2

Date	Tkpr	Description	Hours	Amount
8/05/24	JOH	Attention to multiple clawback actions; Attention to two claims; Review related documents; Call with legal counsel re various matters; Follow up re status of gold sale	2.40	1,152.00
8/09/24	JOH	Attention to subpoena; Email with legal counsel re same	.10	48.00
8/12/24	JOH	Attention to subpoena; Email with legal counsel re same; Attention to eight clawback actions; Review documents and related email correspondence	1.40	672.00
8/13/24	JOH	Further attention to eight clawback actions; Follow up with legal counsel re same; Review related documents; Attention to subpoena response; Email with legal counsel re same; Review documents re claim and clawback action; Follow up re subpoena response	1.90	912.00
8/15/24	JOH	Attention to three clawback actions; Review related documents and email correspondence	.80	384.00
8/20/24	JOH	Attention to clawback action; Review related settlement agreement	.80	384.00
8/22/24	JOH	Attention to discovery matters in clawback action	.30	144.00
8/23/24	JOH	Final review of discovery responses in clawback action; Email with legal counsel re same; Attention to pending clawback action and related claim	1.10	528.00
8/26/24	JOH	Review documents relating to two clawback actions; Review settlement agreement	.90	432.00
8/29/24	JOH	Attention to various clawback actions; Call with clawback defendant re potential resolution; Review documents	1.60	768.00
8/30/24	JOH	Email with legal counsel re clawback action; Review documents concerning claim and multiple clawbacks	1.00	480.00
9/12/24	JOH	Attention to various clawback claims; Follow up with legal counsel re potential resolution of claim; Email with legal counsel re clawback defendant inquiry; Review documents relating to claim against Receivership; Call and Email with claimant and clawback defendant	2.30	1,104.00

TOTAL PROFESSIONAL SERVICES **$ 22,320.00**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	480.00	46.50	22,320.00
TOTALS		**46.50**	**$ 22,320.00**

TOTAL THIS INVOICE **$ 22,320.00**

PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receiver

October 15, 2024

Invoice: 953706
Client: 177110
Matter: 2

REMITTANCE ADVICE

RE: Assett Analysis & Recovery

BALANCE DUE THIS INVOICE **$ 22,320.00**

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

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 # 953706

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-FOURTH INTERIM FEE APPLICATION

Time Records of Parr Brown

EXHIBIT B

PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

October 15, 2024

Invoice: 953701
Client: 176430
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration of Receivership Estate

Professional Services	$ 5,334.50
Total Costs Advanced	$ 58.63
TOTAL THIS INVOICE	**$ 5,393.13**

PARR BROWN GEE & LOVELESS

Invoice: 953701 October 15, 2024
Rust Rare Coin Receivership Client: 176430
Administration of Receivership Estate Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/03/24	WOP	No Charge - Review attorney time sheets; Review docket report; Correspond with various attorneys re updates since last fee application; Email correspondence to BRG	4.70	N/C
7/10/24	JMC	Review and analyze pleadings in several ancillary proceedings	.10	46.00
7/11/24	WOP	Review prior quarterly reports; Continue redaction of billing statements; Correspondence with BRG	2.70	850.50
7/12/24	WOP	Begin draft of quarterly report	2.80	882.00
7/15/24	WOP	No Charge - Correspond with Matt Ball re new invoices; Review the same; Review prior invoices for Arizona counsel	.90	N/C
7/24/24	WOP	Continue draft of quarterly report	1.80	567.00
7/26/24	WOP	Call with Jeff Balls re quarterly report	.20	63.00
7/29/24	WOP	Correspond with Kathy re ledger; Revise quarterly report; Correspond with Jeff re same	2.60	819.00
7/30/24	JMC	Review and revise twenty-third quarterly report; Correspond with Jon Hafen, Jeff Balls and Walter Peterson re the same	.30	138.00
7/30/24	WOP	Review comments to quarterly report; Email correspondence re same	.60	189.00
7/31/24	JMC	Review and finalize consent order; Correspond with Monique McElwee re the same; Review, finalize and coordinate filing and service of twenty-third quarterly report; Correspond with Jon Hafen re the same	.70	322.00
8/01/24	KBT	Correspondence with Jeff Balls and accounting staff re receipt of payback in form of gold bars	.30	162.00
8/05/24	WOP	No Charge - Review and revise attorney time sheets in preparation for fee application; Correspond with BRG and conflict receiver re same	1.80	N/C
8/06/24	WOP	No Charge - Continue redaction of attorney time sheets; Review docket history; Correspond with Jeff re same	1.70	N/C
8/08/24	WOP	No Charge - Review and redact time sheets; Draft fee application; Review Arizona invoices; Correspond with Arizona counsel re same	3.10	N/C
8/12/24	WOP	No Charge - Continue draft of fee application; Call with Jeff Balls; Correspond with BRG re time sheets	2.20	N/C
8/15/24	JMC	Review and analyze deposits from clawback claimant	.20	92.00
8/15/24	WOP	No Charge - Revise attorney time sheets; Further redact the same; Review BRG time sheets; Correspond with Caralee re changes; Prepare exhibits	2.40	N/C
8/19/24	WOP	No Charge - Email correspondence with Jeff Shaw re BRG time records	.30	N/C
8/21/24	WOP	No Charge - Continue draft of fee application; Call with conflict receiver; Further redact time sheets; Revise fee exhibits	3.60	N/C
8/22/24	WOP	No Charge - Call with Arizona counsel; Review and redact time records; Email correspondence with Arizona counsel re invoices; Revise fee application re same	1.70	N/C
8/23/24	WOP	No Charge - Review prior fee applications re Arizona counsel's and conflict receiver's fees; Create tracking spreadsheet re same	3.20	N/C

PARR BROWN GEE & LOVELESS

Invoice: 953701 October 15, 2024
Rust Rare Coin Receivership Client: 176430
Administration of Receivership Estate Matter: 1

Date	Tkpr	Description	Hours	Amount
8/26/24	WOP	No Charge - Email correspondence with Arizona counsel re new time sheets; Review revised time sheets; Further email correspondence re needed corrections; Review revised time sheets; Redact time sheets	1.80	N/C
8/26/24	WOP	No Charge - Meet with Jeff re fee application; Revise fee application	1.40	N/C
8/27/24	WOP	No Charge - Email correspondence with BRG re time records; Review and redact the same; Update fee application re Arizona counsel; Create new exhibits; Draft proposed order; Revise fee application to include BRG narrative; Email correspondence with Joe and Jeff	2.90	N/C
8/28/24	JMC	No Charge - Correspond with Jeff Balls and Walter Peterson re the twenty-third fee application	.10	N/C
8/28/24	WOP	No Charge - Revise fee application; Email correspondence re same	1.30	N/C
8/29/24	JAB	No Charge - Review motion for attorney fees and costs	1.10	N/C
8/30/24	JMC	No Charge - Review and analyze twenty-third fee application; Correspond with Jon Hafen and Jeff Balls re the same	.30	N/C
8/30/24	WOP	No Charge - Email correspondence with Jeff re fee application; Recalculate Arizona counsel's fees; Revise fee application; Further email correspondence re same	.70	N/C
9/03/24	JMC	Correspond with Kathy Bates re settlement payments	.20	92.00
9/04/24	WOP	No Charge - Review comments to fee application; Revise tracking spreadsheet re fees paid to Arizona counsel; Email correspondence with Arizona counsel re same	1.80	N/C
9/05/24	JMC	No Charge - Review and finalize twenty-third fee application; Correspond with Jennifer Korb, Tom Simek and others re the same	.80	N/C
9/11/24	JMC	No Charge - Review and finalize twenty-third fee application; Correspond with Jennifer Kork and Tom Simek re the same; Coordinate filing and service of application	.50	N/C
9/12/24	JMC	No Charge - Correspond with Jeff Balls re approval of fee application; Review order	.10	N/C
9/13/24	JMC	Review and analyze daily deposits and settlement amounts	.10	46.00
9/18/24	WOP	Review docket; Prepare outline for quarterly report; Review prior quarterly reports re reporting requirements	2.80	882.00
9/24/24	JMC	Correspond with Jeff Balls and Lori Stumpf re tenth circuit oral argument and ancillary proceeding cases	.40	184.00

TOTAL PROFESSIONAL SERVICES **$ 5,334.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Kenneth B Tillou	540.00	.30	162.00
Joseph M R Covey	460.00	2.00	920.00
Walter O Peterson	315.00	13.50	4,252.50
TOTALS		**15.80**	**$ 5,334.50**

Invoice: 953701 October 15, 2024
Rust Rare Coin Receivership Client: 176430
Administration of Receivership Estate Matter: 1

COSTS ADVANCED

Date	Description	Amount
7/21/24	Grasshopper - data storage	19.66
8/21/24	Grasshopper - data storage	19.66
9/21/24	Grasshopper - data storage	19.31

TOTAL COSTS ADVANCED **$ 58.63**

TOTAL THIS INVOICE **$ 5,393.13**

PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

October 15, 2024

Invoice: 953701
Client: 176430
Matter: 1

REMITTANCE ADVICE

RE: Administration of Receivership Estate

BALANCE DUE THIS INVOICE **$ 7,308.13**

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 # 953701

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

October 15, 2024

Invoice: 953702
Client: 176430
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Asset Analysis & Recovery

Professional Services	$ 204,482.00
Total Costs Advanced	$ 10,622.34
TOTAL THIS INVOICE	**$ 215,104.34**

PARR BROWN GEE & LOVELESS

Invoice: 953702 October 15, 2024
Rust Rare Coin Receivership Client: 176430
Asset Analysis & Recovery Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/01/24	JMC	Review and analyze several ancillary proceedings and timing	.10	46.00
7/01/24	JAB	Review pleadings	.50	197.50
7/01/24	NR	Research exceptions to discharge for assets earned as a net winner in a ponzi scheme	5.60	1,428.00
7/02/24	JMC	Review appeal on automatic stay; Correspond with Jeff Balls and others re the same	.30	138.00
7/02/24	JAB	Telephone conference with court clerk re default; Review pleadings; Correspond with Jeff Shaw re matters; Telephone conference with Steven Waterman; Telephone conference Nate Freeman re name change; Review settlement communications from James Harward; Correspond with Jonathan Hafen re same; Draft initial disclosures; Review response to notice of bankruptcy	6.00	2,370.00
7/02/24	CMM	Communicate with paralegal Crista Yancey re update to initial disclosures; Draft initial disclosures; Review documents for disclosure production	1.30	383.50
7/02/24	NR	Research dischargeability of assets received by net winners in a Ponzi scheme	1.60	408.00
7/03/24	JAB	Review litigation matters; Telephone conference with Jeff Shaw; Review affidavit for default judgments; Correspond with counsel re Howells; Conference with Crista Yancey; Correspond with investors	2.50	987.50
7/03/24	CMM	Draft Guyon initial disclosures; Research damages numbers for the same; Communicate with Thomas Melton and Crista Yancey re damages and documents for production with initial disclosures	6.80	2,006.00
7/03/24	CY	Attorney conference with Claire McGuire re production of documents for Guyon matter; Prepare production of documents; Multiple email correspondence with Claire McGuire re production; Finalize production of documents; Create drop box link with production	9.10	1,820.00
7/03/24	TMM	Review Guyon production of documents	2.50	1,125.00
7/04/24	JAB	Correspond with paralegals re initial disclosures; Correspond with Joseph Covey re bankruptcy	.60	237.00
7/04/24	CY	Download Guyon production to drop box	3.80	760.00
7/05/24	JAB	Correspond with investors; Draft motion for default judgment; Correspond with Jeff Shaw; Review potential claw back actions; Draft notice of dismissal	5.60	2,212.00
7/05/24	CMM	Revise discovery statement for Guyon; Review documents for initial disclosures; Meet with Crista Yancey re the same	3.20	944.00
7/05/24	CY	Finalize drop box with password; Email outside counsel link for Guyon initial disclosures; Phone conference with Jasmine Leonardi re updated expert report of Ray Strong and concordance; Multiple phone conferences with Jeffery Balls re expert report of Jonathan Hafen and production of documents; Email correspondence and phone conference with Shane Baldwin re updating expert report bates numbers	3.10	620.00

Invoice: 953702 October 15, 2024
Rust Rare Coin Receivership Client: 176430
Asset Analysis & Recovery Matter: 2

Date	Tkpr	Description	Hours	Amount
7/05/24	JL	Discussion with Crista Yancey re production issues; Review revised expert report of Ray Strong	.40	96.00
7/08/24	JMC	Review various pleadings in clawback actions; Correspond with Jeff Balls re Howell bankruptcy and appeal issues; Review Howell bankruptcy	1.10	506.00
7/08/24	MJB	(Hafen v. Howell) Conference with Jeff Balls (0.1)	.10	42.50
7/08/24	JAB	Conference with Joseph Covey; Review bankruptcy filings of Gretchen Howell; Research community property status under bankruptcy; Conference with Claire McGuire and Crista Yancey; Review court orders; Revise attorney planning meeting report; Review documents for initial disclosures	4.50	1,777.50
7/08/24	CMM	Attorney conference with Robert Wing re discovery issues; Research motion to compel short form rules	3.00	885.00
7/08/24	CY	Email correspondence with Claire McGuire and Jeffery Balls re Hafen expert report; Attorney conference with Claire McGuire and Jeffery Balls re Hafen revised expert report; Revise unredacted Hafen expert report; Email correspondence with Shane Baldwin re new concordance upload for expert reports	1.20	240.00
7/08/24	RGW	Call with opposing counsel re deposition	.30	135.00
7/09/24	JMC	Correspond with Jeff Balls re appeal issues	.10	46.00
7/09/24	JAB	Telephone conference with court clerk re filings; Conference with Dick Baldwin; Review scheduling order; Coordinate initial disclosures with Crista Yancy; Telephone conference with Steven Waterman; Conference with Claire McGuire; Correspond with Dan Niese	5.20	2,054.00
7/09/24	DJB	Telephone conference with Jeff Balls re bankruptcy's affect on pending Tenth Circuit appeal and strategy for related motion practice	.20	73.00
7/09/24	CMM	Attorney conference with Jeffery Balls re remaining claims; Research re the same; Communicate re settlement with claimant	1.90	560.50
7/09/24	CY	Prepare initial disclosures for Walker; Download HAFENPROD007 from Salt Lake Legal; Email correspondence with Jeffery Balls re production; Prepare Walker production of documents and download docs to drop box	4.60	920.00
7/09/24	TMM	Telephone conference with Jeff Balls re new cases; Review investor group and BRG investor analyses; Review Guyon production	1.40	630.00
7/10/24	MJB	(Hafen v. Howell) Correspond with Michael Harris (0.1)	.10	42.50
7/10/24	CMM	Communicate with Jeffery Balls and Robert Wing re discovery issues and potential claw backs; Research potential claw back actions	3.30	973.50
7/10/24	CY	Finalize initial disclosures for Walker; Email initial disclosures to Grant and Lucy Walker with dropbox link; Email correspondence with Jeffrey Shaw re documents needed for Terri Andreini's production of documents; Email correspondence with Claire McGuire re production of documents	.30	60.00
7/10/24	RGW	Call re Oberhansly deposition with opposing counsel	.10	45.00

Invoice: 953702 October 15, 2024
Rust Rare Coin Receivership Client: 176430
Asset Analysis & Recovery Matter: 2

Date	Tkpr	Description	Hours	Amount
7/10/24	TMM	Review list of tolling agreements and determine which investors should require termination letters; Review BRG analysis	3.70	1,665.00
7/11/24	JMC	Correspond with Jeremy Sink re Darren Nelson adversary proceeding; Correspond with Claire McGuire re an amended scheduling order and deposition issues	1.30	598.00
7/11/24	MJB	(Hafen v. Howell) Draft letter to Angela Amidan (0.1); Correspond with Michael Harris (0.1)	.20	85.00
7/11/24	CMM	Research potential claw back actions	1.20	354.00
7/11/24	CY	Email correspondence with Thomas Melton re tolling agreements; Revise tolling agreement letters; Phone conference with Thomas Melton re tolling agreements; Multiple email correspondence with Thomas Melton re same; Email correspondence with staff re sending letter certified mail; Prepare production of documents for Andreini; Email production to outside counsel	2.80	560.00
7/11/24	TMM	Review investor group investors with tolling agreements; Revise termination letter	2.60	1,170.00
7/12/24	TMM	Review investment records for new clawback cases; Prepare and review termination letters; Coordinate re tracking	1.70	765.00
7/15/24	JMC	Correspond with Jeff Balls re Larsen settlement	.30	138.00
7/15/24	RMB	Prepare Notice of Termination of Tolling Agreement; Review Lugli investor group file and documents in connection with preparation of Complaint	2.00	870.00
7/15/24	JAB	Review initial disclosures from Terri Andreini; Review correspondence; Draft settlement agreement; Email Jim Harward re same; Email potential claw back defendants; Correspond with James Tracy; Conference with Joseph Covey	7.00	2,765.00
7/15/24	RGW	Emails with Jeff Balls re Woodfin; Review Woodfin issue re settlement	.30	135.00
7/15/24	TMM	Determine which investors have tolling agreements; Telephone conference with Jeff Balls re clarification	3.10	1,395.00
7/16/24	KBT	Telephone conference with Adam Farnsworth re tax treatment of gold bar recipient on return of assets; Analyze effect of potential IRS claims on recoupment right	.60	324.00
7/16/24	JMC	Correspond with Jeff Balls, Jeff Shaw and others re Larsen settlement and tax issue; Correspond with Jeff Shaw re settlement terms; Review Howell Chapter 13 bankruptcy plan	1.30	598.00
7/16/24	MJB	Review bankruptcy plan (0.2); Correspond with Joe Covey and Jeff Balls (0.1)	.30	127.50
7/16/24	JAB	Review claw back actions; Telephone conference with Joseph Covey, Jeff Shaw Leif Larsen, and Vernon Calder re settlements; Telephone conference with gold purchasers; Draft motion for scheduling order; Draft motion for additional time; Draft termination of tolling agreements; Draft motion for default judgment; Conference with Claire McGuire	9.10	3,594.50
7/16/24	ALF	Analyze issues re tax treatment of settlement payments	.50	177.50
7/16/24	CMM	Research potential claw back action; Research for drafting a Complaint	1.80	531.00

Invoice: 953702 October 15, 2024
Rust Rare Coin Receivership Client: 176430
Asset Analysis & Recovery Matter: 2

Date	Tkpr	Description	Hours	Amount
7/16/24	CY	Prepare tolling agreements; Email correspondence with Thomas Melton re same	2.60	520.00
7/16/24	TMM	Prepare and review termination letters; Check addresses and tolling agreements	1.30	585.00
7/17/24	JMC	Correspond with Jeff Balls and Jon Hafen re Larsen settlement and related issues; Correspond with Monique McElwee re proposed consent order	1.00	460.00
7/17/24	JAB	Review information re claw backs; Correspond with claw back defendant re settlement; Draft motion for default judgment; Telephone conference with Jeff Shaw; Draft declaration of Jeff Shaw for default judgments; Review declaration of Jeff Shaw; Correspond with Ryan Pahnke; Telephone conference with James Tracy re settlement; Draft settlement agreement; Correspond with Lori Henry re sale of gold	7.40	2,923.00
7/17/24	CMM	Draft and serve tolling agreement terminations; Communicate with Receiver re bankruptcy question; Communicate with Jeffery Balls re terminations	2.40	708.00
7/17/24	CY	Revise tolling agreement letters; Email correspondence with Thomas Melton re same	.70	140.00
7/18/24	JMC	Review and revise settlement agreement with Larsen; Correspond with Jeff Balls re the agreement and transfer of the gold	2.80	1,288.00
7/18/24	MJB	(Hafen v. Howell) Correspond with Michael Harris (0.1)	.10	42.50
7/18/24	JAB	Telephone conference with Jeff Shaw; Telephone conference with buyers of gold; Conference with Joseph Covey; Review and revise settlement agreement; Conference with claw back defendants re settlement; Draft settlement agreement; Review consent order	7.60	3,002.00
7/18/24	CMM	Review documents for upcoming deposition and discovery responses; Communicate with opposing counsel re scheduling of the same	4.20	1,239.00
7/18/24	RGW	Call with counsel for Oberhansly re deposition	.20	90.00
7/18/24	LH	Perform military searches on Department of Defense Manpower Data Center for individuals and communicate with Jeff Balls re same; Document management re same	.60	141.00
7/19/24	JMC	Review and analyze Howell stay relief motion and Chapter 13 plan; Correspond with Arizona counsel and Jeff Balls re the same; Correspond with Jeff Balls re Larsen settlement agreement; Review and revise agreement; Review consent order; Correspond with Jon Hafen re the same	1.40	644.00
7/19/24	MTH	Review correspondence from James Tracy and Jeff Balls re Larsen settlement	.10	43.00
7/19/24	MJB	(Hafen v. Howell) Review motion for relief from stay (0.2)	.20	85.00
7/19/24	JAB	Correspond with James Tracy re settlement agreement; Correspond with claw back defendants; Draft notice of dismissal; Correspond with Dan Nies; Telephone conference with Jeff Shaw; Review bankruptcy filings from Howells	5.40	2,133.00
7/19/24	WOP	Research gold spot prices; Call with Gary re same	.80	252.00

Invoice: 953702 October 15, 2024
Rust Rare Coin Receivership Client: 176430
Asset Analysis & Recovery Matter: 2

Date	Tkpr	Description	Hours	Amount
7/19/24	TMM	Review Call default documents; Research Chard claim	1.20	540.00
7/19/24	LH	Perform military searches on Department of Defense Manpower Data Center for individuals and communicate with Jeff Balls re same; Document management re same	1.00	235.00
7/20/24	JAB	Finalize default judgment against Peggy Hennings; Correspond with defendants; Correspond with Dan Nies	.70	276.50
7/22/24	JMC	Correspond with Jim Samuelson, Jeff Balls and Matt Ball re bankruptcy issues; Review and analyze Howell bankruptcy documents, stay relief motion and Chapter 13 plan	2.20	1,012.00
7/22/24	MJB	(Hafen v. Howell) Videoconference with Joe Covey, Jeff Balls and James Samuelson (1.0)	1.00	425.00
7/22/24	JAB	Review claw back actions; Draft motion for default judgment; Conference with James Samuelson, Joseph Covey, and Matthew Ball	5.00	1,975.00
7/22/24	CMM	Draft Complaint for potential claw back action; Communicate with Robert Wing re upcoming deposition	2.40	708.00
7/22/24	CY	Research new address for investors for termination of tolling agreement; Email correspondence to Thomas Melton and staff re new letter	.90	180.00
7/22/24	TMM	Review Guyon discovery; Review amended disclosures	1.00	450.00
7/23/24	JMC	Correspond with Jeff Balls re Howell bankruptcy stay relief motion; Review Darren Nelson extension of discovery dates	.70	322.00
7/23/24	JAB	Review correspondence from James Tracy re settlement; Conference with Joseph Covey; Telephone conference with potential claw back defendant; Draft discovery requests	6.80	2,686.00
7/23/24	CMM	Draft stipulated motion and order for Nelson case; Communicate re the same with Joseph Covey; Research bankruptcy issues for the same; Attorney conference with Jeffery Balls re settlement issue in Larsen case; Review written discovery requests and research the same	5.20	1,534.00
7/23/24	TMM	Research Sargent Group investments; Review Bowman investment; Telephone conference with Jeff Balls re Bowman	2.40	1,080.00
7/24/24	JMC	Correspond with Jeff Balls re price of gold and settlement of matter; Review correspondence from Arizona counsel re stay relief and dismissal of case	.30	138.00
7/24/24	JAB	Correspond with Joseph Covey	.10	39.50
7/25/24	JMC	Review settlement agreements; Correspond with Jeff Balls re the same; Correspond with Ryan Mitchell re Larsen defendants and settlement	1.20	552.00
7/25/24	JAB	Correspond with claimant re distributions; Review settlement agreement; Telephone conference with James Samuelson and Joseph Covey; Telephone conference with potential claw back defendant; Correspond with Jonathan Hafen re settlement; Draft settlement agreement; Correspond with Ryan Pahnke; Correspond with Robert Cummings; Draft motion for additional time	4.80	1,896.00
7/25/24	CMM	Review settlement agreement and communicate with Jeffery Balls re the same; Review communication re Howell bankruptcy and discuss the same with Joseph Covey	2.10	619.50

Invoice: 953702 October 15, 2024
Rust Rare Coin Receivership Client: 176430
Asset Analysis & Recovery Matter: 2

Date	Tkpr	Description	Hours	Amount
7/25/24	CMM	Communicate with opposing counsel re bond application and refusal of the same; Attorney conference with Dick Baldwin re the same	.40	118.00
7/26/24	JMC	Review and revise motion to dismiss and motion for stay relief in the Howell case; Correspond with Jeff Balls and Jim Samuelson re the same	1.70	782.00
7/26/24	JAB	Revise objection to motion for relief from stay; Conference with Joseph Covey	2.60	1,027.00
7/26/24	CMM	Attorney conference with Robert Wing re upcoming deposition in Oberhansley matter; Review documents to prepare for deposition; Draft Complaint for claw back matters; Communicate with opposing counsel re scheduling order	5.50	1,622.50
7/26/24	TMM	Draft Sargent complaint; Research Sargent claim; Emails re David Sargent	3.20	1,440.00
7/27/24	JAB	Draft motion for default judgment; Correspond with Jeff Shaw; Draft discovery requests; Draft complaints	.90	355.50
7/29/24	RMB	Conference call with Mike Johnson; Conference call with Jeff Balls and Jeff Shaw re Adrian Alvarez and Rico investment group claw-back action	.70	304.50
7/29/24	JAB	Draft complaints; Revise settlement agreement for Sagarin; Telephone conference with Jeff Shaw and Rodger Burge; Review and revise complaints; Correspond with Claire McGuire re same; Review bankruptcy pleadings; Correspond with James Samuelson re same	4.90	1,935.50
7/29/24	CMM	Research and draft two Complaints against claw back defendants; Communicate with Jeffery Balls re the same; Draft and communicate stipulated motion in Nelson matter; Meet with Robert Wing re Oberhansley deposition; Review documents to prepare for the same	5.10	1,504.50
7/29/24	CY	Research addresses for returned mail for tolling agreements; Email correspondence with staff re same and mailing out updated letters	.70	140.00
7/29/24	TMM	Draft Sargent complaint; Analyze termination letters received and new addresses	2.10	945.00
7/30/24	JMC	Correspond with Jeff Balls, Josh Lee and local AZ counsel re bankruptcy, settlement and related issues; Review and analyze Howell bankruptcy filings	1.00	460.00
7/30/24	JAB	Revise complaint; Correspond with Tom Melton re same; Revise quarterly report; Conference with Tom Melton; Correspond with claw back defendants	3.60	1,422.00
7/30/24	WOP	Calls with Gary Laramie re gold coins; Calls with several local and regional coin shops re ability to purchase large quantities of gold on short notice	3.60	1,134.00
7/30/24	CMM	Revise complaints per feedback from Jeffery Balls; Research Alaska Trust issue; Prepare the same for filing; Review discovery requests from Guyon parties	4.30	1,268.50
7/30/24	CY	Email correspondence with Thomas Melton re complaint and civil cover sheet; Revise complaint; Draft Civil cover sheet	.70	140.00
7/30/24	TMM	Revise Sargent group complaint; Prepare Fields group complaint; Telephone conference with Jeff Balls re Sargent investment	3.10	1,395.00

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Date	Tkpr	Description	Hours	Amount
7/30/24	LH	Review email from claimant and email Jeff Balls re response	.10	23.50
7/31/24	JMC	Correspond with Jim Samuelson re Howell hearing and motion to dismiss; Correspond with Jeff Balls re the same	.30	138.00
7/31/24	RMB	Conference with Jeff Balls re Lugli and Rico claw-back actions; Communicate with Leray Andreini legal counsel re entry of default	.40	174.00
7/31/24	JAB	Review settlement agreement; Conference with Jonathan Hafen; Telephone conference with James Tracy; Telephone conference with Mark Pugsley; Telephone conference with Ryan Pahnke; Draft complaints; Draft motion for additional time to file complaints; Review pleadings re Howell bankruptcy; Review declaration from Jeff Shaw; Telephone conference with potential purchasers of gold	6.70	2,646.50
7/31/24	WOP	Call with Gary and Jeff Balls; Additional call with Gary re liquidating gold; Research secured storage facilities; Make calls re same	2.40	756.00
7/31/24	CMM	Conference with Robert Wing and Rueben Castren re upcoming deposition of Mark Oberhansly; Research and prepare for deposition of Mark Oberhansly; Draft outline re the same; Review discovery requests from Guyon; Prepare complaints for filing	5.50	1,622.50
7/31/24	RGW	Prepare for deposition; Conference with Claire McGuire re same	.90	405.00
7/31/24	TMM	Review motion to extend time to file complaint; Review termination letter spreadsheet and update; Revise Sargent complaint	1.30	585.00
8/01/24	JMC	Correspond with Claire McGuire re Darren Nelson discovery schedule	.30	138.00
8/01/24	JAB	Coordinate sale of gold; Correspond with JM Bullion re same; Review court orders re filing of complaints; Review motion to amend scheduling order; Call Brinks re sale of gold; Coordinate request of summons; Review draft affidavits for default judgment; Correspond with James Tracy settlement and transfer of gold; Correspond with Jonathan Hafen re potential claims against investors	6.40	2,528.00
8/01/24	RGW	Prepare for Obehansly deposition; Conference with Claire McGuire	1.50	675.00
8/02/24	JAB	Conference with Joseph Covey; Coordinate sale of gold; Telephone conference with James Tracy; Review pleadings; Review settlement agreements and deposits; Review agreement with JM Bullion; Telephone conference with Jonathan Hafen, Tom Melton, and investor; Correspond with court clear re default	4.70	1,856.50
8/02/24	WOP	Correspond with various coin dealers re purchase of gold coins; Call with Gary re same; Research current spot price with various outlets	3.70	1,165.50
8/02/24	CMM	Prepare for an attend deposition of Mark B. Oberhansley	8.40	2,478.00
8/02/24	RGW	Prepare for and take deposition of Mark Oberhansly; Call with Jonathan Hafen re same; Conference with Claire McGuire	6.80	3,060.00
8/05/24	JMC	Correspond with Jeff Balls re agreement with JM Bullion and related issues; Review and comment on receipt agreement	.60	276.00
8/05/24	JAB	Draft motion to approve settlement agreement; Correspond with Ryan Pahnke; Telephone conference with James Tracy; Telephone conference with Jeremy Denny re gold agreement;	3.90	1,540.50

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Date	Tkpr	Description	Hours	Amount
8/05/24	TMM	Review and revise Sargent complaint; Emails re termination letters and additional addresses; Additional research re cash defendants; Review returned emails and negotiations	3.50	1,575.00
8/06/24	JMC	Review and revise agreement with JM Bullion re transfer of gold coins; Correspond with Jeff Balls, Bert Byerley, Jeremy Denny, Jon Hafen and others re documents and related issues	3.10	1,426.00
8/06/24	JAB	Review proposed agreement with JM Bullion; Travel to Brink's; coordinate receipt of gold; Telephone conference with Ryan Pahnke	6.30	2,488.50
8/06/24	CY	Revise tolling agreements for Fillerup, Sargent, Gray, and Silver Shoes, LLC; Email correspondence with Thomas Melton re same; Email correspondence with staff to mail letters	.80	160.00
8/07/24	JMC	Correspond with Jeff Balls re payment on gold	.20	92.00
8/07/24	JAB	Correspond with Jeremy Denny; Correspond with attorneys re claw back actions; Draft initial disclosures; Draft discovery requests; Correspond with Bert Byerley; Review revised settlement agreement for Sagarin	6.10	2,409.50
8/07/24	WOP	Call with Jeff Balls re sale of gold coins; Correspond with Gary re same	.60	189.00
8/08/24	JAB	Review claw back actions; Review bank information; Correspond with JM Bullion re sale of gold; Telephone conference with Nate Freeman; Correspond with Michael Harris	3.50	1,382.50
8/08/24	WOP	Calls and emails with Gary Laramie	.80	252.00
8/09/24	JMC	Correspond with Jon Hafen and Jeff Balls re several ancillary proceedings	.20	92.00
8/09/24	JAB	Review bank account; Correspond with JM Bullion; Coordinate issuance of summons; Conference with Tom Melton; Correspond with Dan Nies	2.60	1,027.00
8/12/24	JMC	Correspond with Jeff Balls re clawback action issues; Review Howell bankruptcy appeal notice	.40	184.00
8/12/24	MJB	(Hafen v. Howell) Review notice of relief from stay (0.1)	.10	42.50
8/12/24	JAB	Review bank information; Telephone conference with James Tracy; Draft stipulated dismissal; Correspond with Ryan Pahnke; Telephone conference with Nate Freeman; Telephone conference with Mike Gehret and Kristin Baughman re default judgment; Draft motion to approve settlement agreement	5.00	1,975.00
8/12/24	CY	Email correspondence with Thomas Melton re tolling agreements and returned mail	.10	20.00
8/12/24	TMM	Research cash recipient status; Email to Jeff Balls and Jon Hafen re recommendations for cash recipients; Telephone conference with Jeff Balls re same	3.20	1,440.00
8/13/24	JAB	Draft settlement agreement; Correspond with claw back defendant re same; Telephone conference with Peter Guymon re subpoena; Correspond with Ryan Pahnke	3.50	1,382.50
8/13/24	TMM	Research amounts paid to cash claimants; Draft, review, and revise motion to dismiss and order to dismiss;	3.20	1,440.00
8/14/24	JAB	Review correspondence from opposing counsel; Review order granting motion to dismiss	.40	158.00

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Date	Tkpr	Description	Hours	Amount
8/14/24	WOP	Call with artist re purchase of music; Review payment history; Further correspondence re same	3.20	1,008.00
8/14/24	RGW	Review issues re outstanding discovery in Oberhansly	.30	135.00
8/14/24	TMM	Draft Fields complaint; Research prior correspondence on net winner analysis	2.30	1,035.00
8/15/24	JMC	Review and analyze Howell response to motion to dismiss; Correspond with Jim Samuelson re the same; Correspond with Jeff Balls re collection matters	1.00	460.00
8/15/24	JAB	Review pleadings; Review motion to dismiss bankruptcy	.60	237.00
8/15/24	CY	Update tolling agreement letters for Williams and Fillerup; Email correspondence with Thomas Melton re same	.30	60.00
8/15/24	TMM	Revise Fields complaint	2.10	945.00
8/16/24	JMC	Correspond with Jeff Balls and Jim Samuelson re Howell response and meeting	.40	184.00
8/16/24	JAB	Review bankruptcy pleadings; Correspond with James Samuelson re same; Review settlement payments; Correspond with James Tracy re dismissal of lawsuit; Correspond with Dominic Shaw	2.80	1,106.00
8/19/24	JMC	Correspond with Jim Samuelson and Jeff Balls re bankruptcy reply to Howells and related issues	.50	230.00
8/19/24	RMB	Review Lugli investor claim file in connection with preparation for meeting with counsel (1.3)	1.30	565.50
8/19/24	JAB	Draft initial disclosures; Correspond with Jeff Shaw re same; Review answer of Nichols Family Trust; Draft motion for default judgment; Conference with Joseph Covey and James Samuelson	3.20	1,264.00
8/19/24	CY	Review Silver Shoes, LLC and Plethora, LLC entities; Email Thomas Melton re same; Entitiy for AG Tsunami LLC; Download docs for initial disclosures (Nichols)	3.00	600.00
8/19/24	TMM	Complete Fields complaint; Review and revise Guyon discovery responses; Review email responses to termination letters; Prepare financial disclosure email	2.30	1,035.00
8/20/24	JMC	Review filings in various ancillary proceedings; Review correspondence with Jennifer Korb re bank account collection	.20	92.00
8/20/24	RMB	Conference with Jeff Balls re Lugli investor group claw-back claims; Communicate with Dominic Shaw re meeting with Lugli group; Review analyses and file documents for meeting with Lugli group	1.80	783.00
8/20/24	JAB	Conference with Lori Henry; Telephone conference with Jeff Shaw; Telephone conference with Jennifer Korb; Revise Fields complaint; Correspond with Tom Melton re same; Review status of settlement agreements; Correspond with Hiatt re settlement	3.30	1,303.50
8/20/24	RGW	Email with opposing counsel in Oberhansly; Emails with Jeff Balls re Woodfin settlement	.40	180.00
8/20/24	TMM	Research Fields complaint defendants; emails re same; emails re Guyon discovery responses	3.70	1,665.00

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Date	Tkpr	Description	Hours	Amount
8/20/24	LH	Communicate with Crista Yancey and Jeff Balls re documents for initial disclosures; Run searches and create tag in database re Leon Nichols; Telephone conferences with Premier Legal Technologies re same; Email Premier Legal Technologies search terms for document export for initial disclosures production	1.90	446.50
8/21/24	JAB	Review documents for production; Email Jeff Shaw re settlements; Correspond with Mountain America Credit Union re records; Telephone conference with Mark Pugsley	3.70	1,461.50
8/21/24	CMM	Draft discovery responses to defendants first discovery requests; Communicate with Thomas Melton re the same; Call with claw back defendant re potential for settlement; Draft settlement proposal	6.30	1,858.50
8/21/24	CY	Revise Guyon bates; Prepare docs for first request for production; Email correspondence with Claire McGuire re same	.40	80.00
8/21/24	TMM	Revise Guyon discovery responses; Review research re liability	3.20	1,440.00
8/21/24	LH	Discussions with Jeff Balls re Nichols and Walker document review; Telephone conferences with Shane at Premier Legal Technologies re issues with coding relevant documents; Refine searches and update coding fields	.70	164.50
8/22/24	JAB	Review website responses; Review bankruptcy documents	1.20	474.00
8/22/24	CMM	Research inquiry notice issues for Guyon claw back action; Draft summary re the same for Thomas Melton; Review documents produced including expert reports for evidence related to discovery requests	4.70	1,386.50
8/22/24	CY	Phone conference with Claire McGuire re Ray Strong expert report	.20	40.00
8/22/24	RGW	Review and revise responses to Guyon discovery; Emails with Tom Melton re same	1.00	450.00
8/22/24	TMM	Revise Guyon discovery responses; review Answer	3.00	1,350.00
8/23/24	JAB	Review documents	1.00	395.00
8/23/24	WOP	Call with Gary re sale of coins; Review inventory of Rust coins; Additional call with Gary	.40	126.00
8/23/24	CMM	Revise Guyon discovery responses per feedback from Thomas Melton; Review communications with Receiver re the same; Research questions re retainer arrangement; Communicate with Jeff Shaw re tax documents; Finalize and serve discovery responses	5.40	1,593.00
8/23/24	TMM	Revise discovery responses to Guyon discovery requests; Emails re Sargent complaint; Review Fields complaint and summonses	3.70	1,665.00
8/24/24	JAB	Correspond with Tim Overton	.10	39.50
8/26/24	JMC	Review reply to motion to dismiss Arizona bankruptcy case	.30	138.00
8/26/24	JAB	Email Robert Cummings; Review reply in support of motion to dismiss; Review objection to bankruptcy plan; Draft motion for default	2.20	869.00
8/26/24	CMM	Review offers from potential claw back defendants re settlement; Draft response to the same; Review documents for production in Guyon matter	2.10	619.50

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Date	Tkpr	Description	Hours	Amount
8/27/24	JMC	Review and revise reply in Howell bankruptcy case; Correspond with Jim Samuelson re the same; Review various filings in ancillary proceedings	1.10	506.00
8/27/24	JAB	Conference with Claire McGuire; Finalize motion to approve Sagarin settlement agreement; Review order re extension; Review documents from Jeff Shaw	2.00	790.00
8/27/24	CMM	Communicate with claw back defendants Flint and Ault re potential settlement; Draft emails to both claw back defendants; Meet with Jeffery Balls re the same; Review documents related to claw back action and inheritance issue	1.80	531.00
8/27/24	CMM	Review documents for Guyon production and communicate with Crista Yancey re the same	.80	236.00
8/27/24	CY	Download docs received from Jeffrey Shaw for Guyon production; Email correspondence with Claire McGuire re same	.20	40.00
8/28/24	JAB	Review pleadings; Coordinate request of summons	.80	316.00
8/28/24	CMM	Review documents for Guyon discovery request production; Communicate with Crista Yancey and Jeff Shaw re the same	2.80	826.00
8/28/24	CY	Prepare production of documents for Guyon; Email Jeff Shaw re docs; Bates stamp docs; Prepare one drive link and email production to Peter Guyon	1.00	200.00
8/28/24	TMM	Revise Sargent complaint; Review summonses	2.30	1,035.00
8/28/24	LH	Read and respond to email from Crista Yancey re Jeff Shaw documents and upcoming document production	.10	23.50
8/29/24	JMC	Correspond with Jeff Balls re default judgment set aside request	.30	138.00
8/29/24	JAB	Coordinate production of initial disclosures documents; Conference with Robert Wing; Review answer from Keith Tilley; Telephone conference with investor re settlement payments; Correspond with Shaun Peck	2.20	869.00
8/29/24	CY	Email correspondence with Jeffrey Shaw re access to folder for Nichols production; Download documents received from Jeffrey Shaw for Nichols production	.50	100.00
8/30/24	JAB	Correspond with defendants; Draft complaints; Correspond with Jonathan Hafen re new litigation matters;	3.40	1,343.00
8/30/24	CMM	Review and analyze motion to amend filed by Guyon	2.40	708.00
8/30/24	CY	Bates doc documents for initial disclosure production of documents; Upload docs to dropbox; Email correspondence with Jeff Balls re same	2.20	440.00
8/30/24	TMM	Review motion to terminate tolling agreements; Emails re additional complaints	.30	135.00
8/30/24	LH	Review email from claimant re uncashed check; Email Jeff Balls re same	.20	47.00
9/02/24	JMC	Review deadlines on various ancillary proceedings	.10	46.00
9/02/24	JAB	Review pleadings; Prepare for 10th circuit oral argument	1.60	632.00
9/02/24	LH	Read and respond to email from Powell (claimant) re status of check	.10	23.50
9/03/24	JAB	Conference with Jonathan Hafen; Telephone conference with Mark Pugsley; Prepare for 10th circuit oral argument	3.90	1,540.50

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Date	Tkpr	Description	Hours	Amount
9/03/24	CMM	Review discovery issues in Oberhansley; Communicate with Robert Wing and opposing counsel re meet and confer; Review and revise expert designation for filing; Coordinate filing of the same	1.80	531.00
9/03/24	CY	Revise designation expert report pleading; Email correspondence with Claire McGuire re same; File with court (Oberhansly)	.40	80.00
9/03/24	RGW	Review issues re potential expert testimony in Oberhansly; Review documents re same	1.20	540.00
9/03/24	LH	Review address for Lori Powell and discuss same with Jeff Balls	.20	47.00
9/04/24	JMC	Correspond with local Arizona counsel re the Howell hearing; Review docket entry	.40	184.00
9/04/24	JAB	Telephone conference with Jeff Shaw; Telephone conference with Robert Wing; Telephone conference with Mark Pugsley	1.80	711.00
9/04/24	WOP	Call with music artist re music catalog; Review prior settlement agreement; Review payment history; Additional calls with artist	2.80	882.00
9/05/24	JAB	Telephone conference with Shaun Peck; Telephone conference with John Bitner	.70	276.50
9/05/24	CMM	Attorney conference with Robert Wing re Oberhansly matter; Research issues for the same	1.20	354.00
9/05/24	RGW	Review Oberhansly documents	.70	315.00
9/06/24	JAB	Review documents from clawback defendant	.90	355.50
9/06/24	CMM	Communicate and coordinate with Aults re settlement discussions and evidence needed re the same	1.40	413.00
9/07/24	JMC	Correspond with Claire McGuire and Jeremy Sink re Darren Nelson adversary proceeding	.30	138.00
9/09/24	JMC	Review various filing deadlines in ancillary proceedings	.10	46.00
9/09/24	JAB	Correspond with VonWin re transfer of claim; Telephone conference with Jeff Shaw; Telephone conference with David Head	2.10	829.50
9/09/24	CMM	Review and coordinate production of discovery documents with BRG for Guyon claw back; Attorney conference with Robert Wing, Ray Strong, and Jeff Shaw re the same; Coordinate with Aults re settlement discussions	3.80	1,121.00
9/09/24	RGW	Call with Claire McGuire re discovery and expert issues; Conference with Jeff Shaw and Ray Strong re expert issues	.60	270.00
9/10/24	JAB	Telephone conference with Jeff Shaw; Review affidavit; Search for responsive documents to subpoena; Review documents for clawback defendants	3.50	1,382.50
9/10/24	LH	Communicate with Jeff Balls re Shadle documents to be produced; Prepare documents to be produced in response to subpoena	.50	117.50
9/11/24	JAB	Prepare for 10th Circuit oral argument; Correspond with Michael Gehret; Draft motion for default judgment	3.90	1,540.50
9/12/24	JMC	Correspond Jeff Balls re Brandon Paske matter; Correspond with Jim Samuelson re Arizona bankruptcy matter	.20	92.00

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Date	Tkpr	Description	Hours	Amount
9/12/24	JAB	Correspond with Jonathan Hafen re matters; Correspond with Crista Yancey re initial disclosures; Draft motion to amend complaint	3.70	1,461.50
9/12/24	CY	Email correspondence with Salt Lake Legal re production for Walker and Nichols; Phone conference with Shane Bawden re same; Phone conference with Jeffery Balls re same	1.60	320.00
9/13/24	JAB	Telephone conference with Claire McGuire and Steven Ault; Telephone conference with Michael Gehret; Draft amended complaint; Email Dan Nies; Email Leon Nichols; Draft notice of stipulation to amend complaint	3.70	1,461.50
9/13/24	CMM	Call with Connie Ault; In person meeting with Steve Ault and Jeffery Balls re potential settlement and ability to pay analysis; Follow up from in person meeting; Review settlement deposits	1.80	531.00
9/13/24	CY	Phone conference with Shane Badwen re production of docs; Email correspondence with Jeffery Balls re same; Download docs from Salt Lake Legal (Walker and Nichols)	.70	140.00
9/16/24	JAB	Prepare for 10th Circuit oral argument; Telephone conference with Court clerk; Draft notice of dismissal for Hiatt and Bitner	3.90	1,540.50
9/16/24	DJB	Conference with Jeff Balls re Tenth Circuit panel assignment for upcoming oral argument	.50	182.50
9/16/24	CY	Prepare initial disclosure documents for Walker and Nichols; Email correspondence with Jeffery Balls re same	2.50	500.00
9/17/24	JAB	Prepare for 10th circuit oral argument; Coordinate production of initial disclosures; Review court orders	5.40	2,133.00
9/17/24	CMM	Communicate with Robert Wing re Oberhansley matter and discovery issues in the same; Communicate with opposing counsel re the same	.60	177.00
9/17/24	CY	Email counsel for Walker and Nichols initial disclosure documents; Email correspondence with Jeffery Balls re same	.30	60.00
9/18/24	JMC	Review filings in auxiliary proceedings; Review filing deadlines	.20	92.00
9/18/24	JAB	Review declaration of Call; Telephone conference with Jeff Shaw; Draft motion for default judgment; Draft default judgment; Prepare for 10th Circuit oral argument	4.00	1,580.00
9/18/24	RGW	Conference with Claire McGuire re discovery; Emails with counsel for Mr. Oberhansly	.20	90.00
9/19/24	JAB	Review correspondence; Review court orders	3.20	1,264.00
9/19/24	RGW	Call with counsel for Obehansly; Conference with Claire McGuire re discovery motion	.50	225.00
9/20/24	JAB	Prepare for 10th Circuit oral argument	3.50	1,382.50
9/21/24	JAB	Prepare for 10th circuit oral argument	.90	355.50
9/22/24	JAB	Travel to Denver; Prepare for 10th circuit oral argument	6.50	2,567.50
9/23/24	MJB	(Hafen v. Howell) Correspond with Jeff Balls (0.1)	.10	42.50
9/23/24	JAB	Prepare for oral argument; Attend oral argument; Travel to Salt Lake	9.30	3,673.50
9/23/24	CMM	Review settlement offer and discuss the same with Parr Brown team; Draft counter offer	1.70	501.50

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Date	Tkpr	Description	Hours	Amount
9/24/24	JMC	Correspond with Sean Egan re Alesha Franklin recovery and collection issues	.60	276.00
9/24/24	JAB	Draft motion for default judgment; Conference with Jeff Shaw; Review documents; Conference with Robert Cummings; Conference with Joseph Covey	5.10	2,014.50
9/24/24	CMM	Call with Jeffery Balls re need for motion for extension for default; Research and draft the same; Revise and coordinate filing of same	1.70	501.50
9/24/24	CY	Revise motion to dismiss or default (Wade); Phone conference with Claire McGuire re same; File motion with court	.10	20.00
9/24/24	LH	Military searches for Olsen and Weilacher and email certificates of status of military service to Jeff Balls; Document management re same	.20	47.00
9/25/24	JMC	Correspond with Jeremy Sink and Claire McGuire re Nelson case; Review and analyze discovery requests; Correspond with Claire McGuire re Hult settlement and litigation	2.00	920.00
9/25/24	CMM	Review discovery requests from Nelson; Communicate with Joseph Covey re the same and case strategy	2.10	619.50
9/25/24	CY	Draft Order for additional time to dismiss or default (Wade); Email correspondence with Claire McGuire re same; Email order to Judge Campbel	.50	100.00
9/27/24	JMC	Correspond with Claire McGuire re Nelson and discovery issues; Review and analyze lawsuits and legal strategy; Correspond with Jeremy Sink re the same	2.40	1,104.00
9/27/24	JAB	Review pleadings; Review settlement deposits; Correspond with Ryan Pahnke; Draft discovery requests; Draft motion for summary judgment	2.90	1,145.50
9/27/24	CMM	Research issue for Nelson bankruptcy; Call with Joseph Covey re the same; Communication with Jack Nunn re follow up research	5.20	1,534.00
9/30/24	JMC	Correspond with Jack Nunn and Claire McGuire re research on Nelson lawsuit; Review case law re the same	1.20	552.00
9/30/24	JAB	Draft motion for summary judgment; Review court orders; Correspond with counsel	7.10	2,804.50
9/30/24	JWN	Attend meeting with Joseph Covey and Claire McGuire to discuss researching cases re concealment and misrepresentations under 11 U.S.C. § 727(a)(2) for the purpose of evaluating the strength of our Section 727(a)(2) claim against Nelson	.60	153.00
9/30/24	JWN	Research what particular types of concealment conduct constitute purposefully trying to hinder, delay, or defraud creditors under 11 U.S.C. § 727	3.10	790.50

TOTAL PROFESSIONAL SERVICES **$ 204,482.00**

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SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Kenneth B Tillou	540.00	.60	324.00
Joseph M R Covey	460.00	33.20	15,272.00
Rodger M Burge	435.00	6.20	2,697.00
Michael T Hoppe	430.00	.10	43.00
Matthew J Ball	425.00	2.20	935.00
Jeffery A Balls	395.00	244.00	96,380.00
Dick J Baldwin	365.00	.70	255.50
Adam L Farnsworth	355.00	.50	177.50
Walter O Peterson	315.00	18.30	5,764.50
Claire M McGuire	295.00	115.60	34,102.00
Jack W Nunn	255.00	3.70	943.50
Thomas M Melton	450.00	63.40	28,530.00
Robert G Wing	450.00	15.00	6,750.00
Nathan Rich	255.00	7.20	1,836.00
Jasmine Leonardi - Paralegal	240.00	.40	96.00
Lori Henry - Paralegal	235.00	5.60	1,316.00
Crista Yancey - Paralegal	200.00	45.30	9,060.00
TOTALS		**562.00**	**$ 204,482.00**

COSTS ADVANCED

Date	Description	Amount
7/09/24	Premier Legal Technologies - Concordance Load file for Updated Expert Reports	2,280.94
7/10/24	Foreclosure Sale Services	381.71
7/11/24	SimpleCertified mail expense	97.90
	Copies - B & W	.75
7/16/24	SimpleCertified mail expense	9.82
7/17/24	SimpleCertified mail expense	157.12
7/22/24	SimpleCertified mail expense	19.64
7/25/24	SimpleCertified mail expense	49.10
7/29/24	SimpleCertified mail expense	39.28
7/29/24	Utah District Court - filing fee	405.00
7/29/24	Utah District Court - filing fee	405.00
7/30/24	Utah District Court - filing fee	405.00
7/31/24	Utah District Court - filing fee	405.00
7/31/24	Utah District Court - filing fee	405.00
7/31/24	Utah District Court - filing fee	405.00
7/31/24	Utah District Court - filing fee	405.00
7/31/24	July 2024 Westlaw Charges	40.84
8/05/24	Utah Process - service of process on Rob Hiatt	80.00
8/06/24	SimpleCertified Mail expense	39.28
8/09/24	Constable Reitz - service of process on Keith Tilley	110.00
8/13/24	Pacer Electronic Court Records	12.10
8/14/24	Red Rock Reporting - Deposition Transcript of Mark Oberhansly	950.85
8/15/24	SimpleCertified mail expense	19.64

PARR BROWN GEE & LOVELESS

Invoice: 953702
Rust Rare Coin Receivership
Asset Analysis & Recovery

October 15, 2024
Client: 176430
Matter: 2

Date	Description	Amount
8/15/24	Constable Reitz - service of process on John Bitner	80.00
8/19/24	SimpleCertified mail expense	9.82
8/19/24	Utah Process Inc. - service of process on Steven Ault	20.00
8/19/24	Utah Process Inc. - service of process on Connie Ault	65.00
8/19/24	Utah Process Inc. - service of process on Max Zipline Inc.	20.00
8/19/24	Utah Process Inc. - service of process on The AOK Family Trust	20.00
8/19/24	Utah Process Inc. - service of process on Rover Flatts	20.00
8/19/24	Utah Process Inc. - service of process on SHCH Alaska Trust	20.00
8/23/24	Utah District Court - New action	405.00
8/28/24	Utah District Court - filing fee	405.00
8/31/24	August 2024 Westlaw charges	66.18
9/11/24	PACER Electronic Court Records	6.90
9/13/24	SimpleCertified mail expense	19.64
9/16/24	Delta - Jeff Balls	386.96
9/16/24	Premier Legal - Production of Ipro documents for Walker and Nichols	1,327.03
9/22/24	Uber - Non local rental car/taxi	48.18
9/23/24	Delta - Jeff Balls	75.00
9/23/24	Hyatt Centric - Hotel	346.09
9/23/24	Airport Parking - Jeff Balls	50.00
9/23/24	Uber - Non local rental car/taxi	55.16
9/27/24	PACER Electronic Court Records	1.70
9/30/24	September 2024 Westlaw charges	50.71

TOTAL COSTS ADVANCED **$ 10,622.34**

TOTAL THIS INVOICE **$ 215,104.34**

PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

October 15, 2024

Invoice: 953702
Client: 176430
Matter: 2

REMITTANCE ADVICE

RE: Asset Analysis & Recovery

BALANCE DUE THIS INVOICE **$ 215,104.34**

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 # 953702

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

October 15, 2024

Invoice: 953703
Client: 176430
Matter: 3

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Disposition of Assets

Professional Services	$ 5,259.50
Total Costs Advanced	$ .00
TOTAL THIS INVOICE	**$ 5,259.50**

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

Invoice: 953703 October 15, 2024
Rust Rare Coin Receivership Client: 176430
Disposition of Assets Matter: 3

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/17/24	WOP	Office conference with Jeff Balls; Review previous purchase agreements with Legacy Rare Coins; Call with Gary Laramie re purchasing gold eagles	1.30	409.50
7/18/24	WOP	Call with Legacy Coins re purchase of gold	.60	189.00
7/26/24	WOP	Call with Jeff Balls re liquidating gold; Call with Gary re same	.50	157.50
7/29/24	WOP	Call with Gary re liquidating gold coins	.50	157.50
7/31/24	JMC	Correspond with Jeff Balls re changes Larsen settlement and logistical issues; Review revised settlement agreement	2.30	1,058.00
8/01/24	JMC	Correspond with Jeff Balls re recovery of gold, agreement with buyer and logistics of delivery and inspection; Correspond with Representative of JM Bullion re the same	2.50	1,150.00
8/01/24	WOP	Follow-up calls with Legacy Coins re gold purchase; Correspond with Gary; Correspond with Jeff Balls re same	.80	252.00
8/02/24	JMC	Correspond with Jeff Balls and Kathleen Bates re settlement and logistics of receiving gold; Draft agreement with JM Bullion; Correspond with Jon Hafen re the same	3.90	1,794.00
8/09/24	JMC	Correspond with Jeff Balls re claim transfer	.20	92.00

TOTAL PROFESSIONAL SERVICES **$ 5,259.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	460.00	8.90	4,094.00
Walter O Peterson	315.00	3.70	1,165.50
TOTALS		**12.60**	**$ 5,259.50**

TOTAL THIS INVOICE **$ 5,259.50**

PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

October 15, 2024

Invoice: 953703
Client: 176430
Matter: 3

REMITTANCE ADVICE

RE: Disposition of Assets

BALANCE DUE THIS INVOICE **$ 5,259.50**

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 # 953703

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

October 15, 2024

Invoice: 953704
Client: 176430
Matter: 5

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Claims Administration

Professional Services	$ 197.50
Total Costs Advanced	$ .00
TOTAL THIS INVOICE	**$ 197.50**

PARR BROWN GEE & LOVELESS

Invoice: 953704 October 15, 2024
Rust Rare Coin Receivership Client: 176430
Claims Administration Matter: 5

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/26/24	JAB	Telephone conference with claimant	.20	79.00
8/08/24	JAB	Correspond with claimant re assignment; Correspond with VonWin	.30	118.50
		TOTAL PROFESSIONAL SERVICES		**$ 197.50**

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jeffery A Balls	395.00	.50	197.50
TOTALS		**.50**	**$ 197.50**

TOTAL THIS INVOICE **$ 197.50**

PARR BROWN GEE & LOVELESS
ATTORNEYS AT LAW

Rust Rare Coin Receivership

October 15, 2024

Invoice: 953704
Client: 176430
Matter: 5

REMITTANCE ADVICE

RE: Claims Administration

BALANCE DUE THIS INVOICE **$ 197.50**

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 # 953704

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-FOURTH 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

October 17, 2024
Client-Project: 016222-025457
Invoice #: 10005706
Tax ID: 27-1451273

Via Email: jhafen@parrbrown.com

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

Services Rendered From July 1, 2024 Through September 30, 2024

Professional Services	$	90,432.00	USD
Voluntary Reduction		(2,362.50)	
CURRENT CHARGES	$	**88,069.50**	**USD**

PAYMENT IS DUE BY November 16, 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:	10005706

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 # 10005706
Client-Project: 016222-025457

Services Rendered From July 1, 2024 Through September 30, 2024

PROFESSIONAL SERVICES

	Rate	Hours	Amount
Managing Director			
Vernon Calder	455.00	1.30	591.50
Ray Strong	415.00	2.20	913.00
Associate Director			
Leif Larsen	375.00	8.70	3,262.50
Jeffrey Shaw	375.00	221.10	82,912.50
Jeffrey Shaw	0.00	6.30	N/C
Case Assistant			
Jeffrey Stouffer	225.00	1.60	360.00
Kellee Calder	150.00	0.20	30.00
Total Professional Services		**241.40**	**88,069.50**

BRG INVOICE

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

Invoice # 10005706
Client-Project: 016222-025457

SUMMARY BY TASK CODE

Task Code	Description	Hours	Amount
300	Claims Process / Distribution	1.80	675.00
350	Net Winner / Claims Analysis	12.50	4,687.50
500	Recovery Litigation	207.50	77,900.50
600	Tax Compliance & Analysis	13.30	4,806.50
950	Fee Application Preparation & Hearing	6.30	0.00
Total Professional Services		**241.40**	**88,069.50**

BRG INVOICE

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

Invoice # 10005706
Client-Project: 016222-025457

Services Rendered From July 1, 2024 Through September 30, 2024

DETAIL OF PROFESSIONAL SERVICES

Date	Name	Description	Hours	Rate	Amount
Task Code: 300 - Claims Process / Distribution					
07/26/24	Jeffrey Shaw	Reviewed status of investor distribution checks and updated distribution schedule.	1.80	375.00	675.00
		Total for Task Code 300	**1.80**		**675.00**
Task Code: 350 - Net Winner / Claims Analysis					
07/03/24	Jeffrey Shaw	Reviewed Banjo Trading investment activity and support and responded to counsel inquiry.	1.50	375.00	562.50
07/08/24	Jeffrey Shaw	Reviewed and prepared net winner analysis for various investment groups per counsel request.	3.50	375.00	1,312.50
07/15/24	Jeffrey Shaw	Analyzed activity for third party requested by counsel and prepared email regarding the same.	0.80	375.00	300.00
07/17/24	Jeffrey Shaw	Reviewed Nichols data in preparation for call.	0.50	375.00	187.50
07/18/24	Jeffrey Shaw	Reviewed Nichols support and email to counsel regarding the same.	0.70	375.00	262.50
07/19/24	Jeffrey Shaw	Call with counsel regarding net winner issues.	0.40	375.00	150.00
07/22/24	Jeffrey Shaw	Reviewed investor activity and support per counsel request.	1.50	375.00	562.50
07/23/24	Jeffrey Shaw	Analyzed investment activity and support and prepared response to counsel inquiry.	3.60	375.00	1,350.00
		Total for Task Code 350	**12.50**		**4,687.50**
Task Code: 500 - Recovery Litigation					
07/01/24	Jeffrey Shaw	Analyzed investment transactions and support for Fields group.	1.50	375.00	562.50
07/01/24	Jeffrey Shaw	Prepared declaration narrative.	2.10	375.00	787.50
07/01/24	Jeffrey Shaw	Prepared declaration schedules.	1.90	375.00	712.50
07/02/24	Jeffrey Shaw	Analyzed investment transactions and support for Fields group and prepared declaration narrative and exhibits.	4.10	375.00	1,537.50
07/03/24	Jeffrey Shaw	Prepared declaration exhibits.	2.50	375.00	937.50
07/03/24	Jeffrey Shaw	Reviewed and revised declaration narrative and schedules.	2.00	375.00	750.00

BRG INVOICE

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

Invoice # 10005706
Client-Project: 016222-025457

Date	Name	Description	Hours	Rate	Amount
Task Code: 500 - Recovery Litigation					
07/03/24	Jeffrey Shaw	Call with counsel regarding litigation / net winner issues.	0.30	375.00	112.50
07/05/24	Jeffrey Shaw	Reviewed and analyzed investment activity and support for [redacted] and prepared reply to counsel inquiry.	3.50	375.00	1,312.50
07/05/24	Jeffrey Shaw	Reviewed and responded to counsel emails regarding litigation.	0.30	375.00	112.50
07/05/24	Jeffrey Shaw	Reviewed, finalized and submitted declaration narrative and exhibits.	1.20	375.00	450.00
07/08/24	Jeffrey Shaw	Reviewed, prepared and submitted documents to counsel in connection with initial disclosures for [redacted] Walker.	2.20	375.00	825.00
07/08/24	Jeffrey Shaw	Reviewed investment activity and transaction detail in connection with Initial disclosures for [redacted] Walker.	1.50	375.00	562.50
07/10/24	Jeffrey Shaw	Reviewed investment activity and transaction detail in connection with Initial disclosures for T Andreini.	2.50	375.00	937.50
07/10/24	Jeffrey Shaw	Reviewed, prepared and submitted documents to counsel in connection with initial disclosures for T Andreini.	3.50	375.00	1,312.50
07/11/24	Jeffrey Shaw	Reviewed Nichols investment activity and support.	2.90	375.00	1,087.50
07/11/24	Jeffrey Shaw	Reviewed, prepared and submitted documents per counsel inquiry.	3.30	375.00	1,237.50
07/11/24	Jeffrey Shaw	Reviewed and responded to email from counsel regarding Andreini.	0.70	375.00	262.50
07/12/24	Jeffrey Shaw	Reviewed investment activity and support for Hennings.	2.80	375.00	1,050.00
07/12/24	Jeffrey Shaw	Reviewed and prepared declaration narrative.	1.50	375.00	562.50
07/15/24	Jeffrey Shaw	Prepared declaration schedules.	2.10	375.00	787.50
07/15/24	Jeffrey Shaw	Reviewed investment activity for Hennings.	1.80	375.00	675.00
07/15/24	Jeffrey Shaw	Prepared declaration narrative.	2.50	375.00	937.50
07/16/24	Jeffrey Shaw	Prepared declaration exhibits.	2.60	375.00	975.00
07/16/24	Jeffrey Shaw	Reviewed, discussion and emails regarding Larsen litigation.	0.50	375.00	187.50
07/16/24	Jeffrey Shaw	Call with counsel regarding Larsen litigation.	0.60	375.00	225.00

BRG INVOICE

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

Invoice # 10005706
Client-Project: 016222-025457

Date	Name	Description	Hours	Rate	Amount
Task Code: 500 - Recovery Litigation					
07/16/24	Jeffrey Shaw	Prepared email to metals expert regarding gold eagle liquidation in connection with Larsen litigation.	0.30	375.00	112.50
07/16/24	Jeffrey Shaw	Discussions with tax professionals regarding tax issues in connection with Larsen settlement.	0.40	375.00	150.00
07/17/24	Jeffrey Shaw	Prepared declaration exhibits.	3.90	375.00	1,462.50
07/17/24	Jeffrey Shaw	Reviewed Larsen settlement agreement and email regarding the same.	0.80	375.00	300.00
07/17/24	Jeffrey Shaw	Call with counsel regarding litigation issues.	0.70	375.00	262.50
07/17/24	Jeffrey Shaw	Reviewed and updated declaration narrative.	1.10	375.00	412.50
07/18/24	Jeffrey Shaw	Reviewed issues regarding Larsen settlement agreement.	0.90	375.00	337.50
07/18/24	Jeffrey Shaw	Call with metals expert in connection with Larsen settlement.	0.60	375.00	225.00
07/18/24	Jeffrey Shaw	Discussions with counsel regarding Larsen settlement.	0.60	375.00	225.00
07/18/24	Jeffrey Shaw	Reviewed updated settlement agreement.	0.40	375.00	150.00
07/18/24	Jeffrey Shaw	Follow-up with metals expert.	0.20	375.00	75.00
07/18/24	Ray Strong	Analyzed proposed settlement relating to Larsen litigation.	0.30	415.00	124.50
07/18/24	Ray Strong	Analyzed Shaw declaration for Henning litigation for finalization.	0.30	415.00	124.50
07/18/24	Ray Strong	Evaluated status of pending recovery litigation to understand outstanding litigation and timing.	0.30	415.00	124.50
07/19/24	Jeffrey Shaw	Reviewed, revised, finalized and submitted declaration narrative and exhibits.	6.40	375.00	2,400.00
07/25/24	Jeffrey Shaw	Analyzed Fields group transactions and support per counsel inquiry.	1.90	375.00	712.50
07/29/24	Jeffrey Shaw	Reviewed Adrian group transactions and supporting documents.	1.90	375.00	712.50
07/29/24	Jeffrey Shaw	Reviewed and prepared declaration narrative for [redacted]	2.00	375.00	750.00
07/29/24	Jeffrey Shaw	Discussions with counsel regarding Adrian group litigation.	0.40	375.00	150.00

BRG INVOICE

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

Invoice # 10005706
Client-Project: 016222-025457

Date	Name	Description	Hours	Rate	Amount
Task Code: 500 - Recovery Litigation					
07/30/24	Jeffrey Shaw	Reviewed, prepared and updated declaration narrative.	1.70	375.00	637.50
07/30/24	Jeffrey Shaw	Prepared declaration schedules.	1.50	375.00	562.50
07/31/24	Jeffrey Shaw	Reviewed and revised declaration narrative.	0.80	375.00	300.00
07/31/24	Jeffrey Shaw	Emails to counsel regarding litigation issues.	0.20	375.00	75.00
07/31/24	Jeffrey Shaw	Reviewed, prepared and updated declaration schedules.	1.40	375.00	525.00
07/31/24	Jeffrey Shaw	Prepared declaration exhibits.	3.80	375.00	1,425.00
08/01/24	Jeffrey Shaw	Prepared declaration exhibits.	2.80	375.00	1,050.00
08/01/24	Jeffrey Shaw	Reviewed and revised declaration narrative and exhibits.	1.70	375.00	637.50
08/01/24	Jeffrey Shaw	Finalized and submitted declaration to counsel.	0.90	375.00	337.50
08/01/24	Ray Strong	Reviewed Shaw declaration for finalization in Adrian Lara recovery litigation.	0.20	415.00	83.00
08/02/24	Jeffrey Shaw	Reviewed revised Larsen settlement agreement.	0.30	375.00	112.50
08/19/24	Jeffrey Shaw	Follow-up regarding litigation issues.	0.20	375.00	75.00
08/19/24	Jeffrey Shaw	Reviewed counsel request in connection with litigation efforts.	0.50	375.00	187.50
08/19/24	Jeffrey Shaw	Reviewed and reconciled settlement agreements.	2.50	375.00	937.50
08/20/24	Jeffrey Shaw	Call with counsel regarding litigation issues.	0.70	375.00	262.50
08/20/24	Jeffrey Shaw	Reviewed, uploaded, reconciled and organized settlement agreements.	3.30	375.00	1,237.50
08/20/24	Jeffrey Shaw	Updated and revised settlement summary.	2.90	375.00	1,087.50
08/20/24	Jeffrey Shaw	Reviewed and prepared support for settlement agreements.	0.70	375.00	262.50
08/21/24	Jeffrey Shaw	Reviewed settlement agreements.	0.80	375.00	300.00
08/21/24	Jeffrey Shaw	Reconciled Receiver settlement schedule with BRG summary.	1.90	375.00	712.50
08/21/24	Jeffrey Shaw	Updated and revised settlement summary.	1.00	375.00	375.00
08/21/24	Jeffrey Shaw	Prepared email to counsel regarding settlement agreements.	0.30	375.00	112.50

BRG INVOICE

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

Invoice # 10005706
Client-Project: 016222-025457

Date	Name	Description	Hours	Rate	Amount
Task Code: 500 - Recovery Litigation					
08/21/24	Jeffrey Shaw	Reviewed and updated settlement summary for non-investor settlements.	0.70	375.00	262.50
08/23/24	Jeffrey Shaw	Reviewed case files and documents and responded to counsel inquiry in connection with litigation matter.	3.50	375.00	1,312.50
08/26/24	Jeffrey Shaw	Reviewed and prepared disclosure documents in connection with litigation per counsel request.	1.50	375.00	562.50
08/26/24	Jeffrey Shaw	Resolved issues related to data share folder.	0.50	375.00	187.50
08/26/24	Jeffrey Shaw	Reviewed and compiled Nichols group transactions and supporting documents for discovery.	3.90	375.00	1,462.50
08/26/24	Jeffrey Shaw	Reviewed and resolved data share file issues.	0.50	375.00	187.50
08/27/24	Jeffrey Shaw	Emails and follow-up regarding document disclosure.	0.40	375.00	150.00
08/27/24	Jeffrey Shaw	Reviewed and prepared disclosure documents in connection with litigation per counsel request.	4.70	375.00	1,762.50
08/28/24	Jeffrey Shaw	Reviewed files and resolved issues regarding document production.	1.10	375.00	412.50
08/29/24	Jeffrey Shaw	Review and follow-up regarding Nichols initial disclosures.	0.50	375.00	187.50
09/03/24	Jeffrey Shaw	Reviewed and responded to email regarding litigation issues.	0.20	375.00	75.00
09/03/24	Jeffrey Shaw	Prepared Wall declaration.	1.20	375.00	450.00
09/03/24	Jeffrey Shaw	Reviewed investment activity and support for Nichols group.	1.30	375.00	487.50
09/03/24	Jeffrey Shaw	Follow-up with counsel regarding litigation issues.	0.20	375.00	75.00
09/04/24	Jeffrey Shaw	Follow-up with counsel regarding litigation issues.	0.30	375.00	112.50
09/04/24	Jeffrey Shaw	Reviewed investment activity for Nichols group and prepared Wall declaration.	4.50	375.00	1,687.50
09/05/24	Jeffrey Shaw	Discussions and follow-up regarding litigation issues.	0.50	375.00	187.50
09/05/24	Jeffrey Shaw	Reviewed Oberhansly deposition.	1.50	375.00	562.50
09/05/24	Jeffrey Shaw	Analyzed Call transactions, investment activity and support.	4.80	375.00	1,800.00
09/06/24	Jeffrey Shaw	Analyzed Call transactions, investment activity and support.	4.90	375.00	1,837.50

BRG INVOICE

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

Invoice # 10005706
Client-Project: 016222-025457

Date	Name	Description	Hours	Rate	Amount
Task Code: 500 - Recovery Litigation					
09/06/24	Jeffrey Shaw	Prepared Call declaration narrative.	1.50	375.00	562.50
09/09/24	Jeffrey Shaw	Call with counsel regarding litigation issues.	0.60	375.00	225.00
09/09/24	Jeffrey Shaw	Reviewed and updated Wall declaration and schedules.	3.10	375.00	1,162.50
09/09/24	Jeffrey Shaw	Prepared Wall declaration exhibits.	1.10	375.00	412.50
09/09/24	Ray Strong	Attended call with counsel and BRG regarding expert reports/declarations for Oberhansly litigation.	0.60	415.00	249.00
09/10/24	Jeffrey Shaw	Call with counsel regarding litigation issues.	0.20	375.00	75.00
09/10/24	Jeffrey Shaw	Analyzed RRC files, investor transactions, and support for Guyon group per counsel request and emails regarding the same.	3.90	375.00	1,462.50
09/10/24	Jeffrey Shaw	Reviewed and updated declaration narrative and schedules.	1.60	375.00	600.00
09/10/24	Jeffrey Shaw	Prepared declaration exhibits.	1.10	375.00	412.50
09/10/24	Jeffrey Shaw	Reviewed and prepared Call declaration narrative.	1.20	375.00	450.00
09/11/24	Jeffrey Shaw	Reviewed and prepared Call declaration narrative.	2.40	375.00	900.00
09/11/24	Jeffrey Shaw	Reviewed investment activity and prepared Call declaration schedules.	1.90	375.00	712.50
09/11/24	Jeffrey Shaw	Reviewed, finalized and submitted Wall declaration and exhibits.	0.50	375.00	187.50
09/12/24	Jeffrey Shaw	Reviewed investment activity and support and prepared declaration schedules.	2.70	375.00	1,012.50
09/13/24	Jeffrey Shaw	Reviewed, prepared and updated declaration narrative.	2.60	375.00	975.00
09/13/24	Jeffrey Shaw	Reviewed, prepared and updated declaration schedules.	2.20	375.00	825.00
09/16/24	Jeffrey Shaw	Reviewed and updated declaration narrative.	1.80	375.00	675.00
09/16/24	Jeffrey Shaw	Reviewed and updated declaration schedules.	1.20	375.00	450.00
09/17/24	Jeffrey Shaw	Prepared Call declaration exhibits.	4.70	375.00	1,762.50
09/18/24	Jeffrey Shaw	Prepared Call declaration exhibits.	3.50	375.00	1,312.50
09/18/24	Jeffrey Shaw	Reviewed and updated Call declaration narrative.	1.50	375.00	562.50
09/18/24	Jeffrey Shaw	Reviewed, finalized and submitted Call declaration.	1.20	375.00	450.00

BRG INVOICE

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

Invoice # 10005706
Client-Project: 016222-025457

Date	Name	Description	Hours	Rate	Amount
Task Code: 500 - Recovery Litigation					
09/18/24	Ray Strong	Reviewed declaration and exhibits for Call litigation.	0.50	415.00	207.50
09/23/24	Jeffrey Shaw	Analyzed Oberhansly activity and transactions.	3.90	375.00	1,462.50
09/24/24	Jeffrey Shaw	Prepared Oberhansly declaration narrative.	0.50	375.00	187.50
09/24/24	Jeffrey Shaw	Call with counsel regarding litigation issues.	0.30	375.00	112.50
09/24/24	Jeffrey Shaw	Reviewed Wade analysis and support and prepared email in connection with counsel inquiry.	1.90	375.00	712.50
09/26/24	Jeffrey Shaw	Analyzed Oberhansly activity and support.	5.40	375.00	2,025.00
09/27/24	Jeffrey Shaw	Analyzed Oberhansly activity and support.	4.50	375.00	1,687.50
09/27/24	Jeffrey Shaw	Prepared updated Oberhansly net winner schedules.	1.70	375.00	637.50
09/30/24	Jeffrey Shaw	Analyzed Oberhansly activity and support.	3.80	375.00	1,425.00
09/30/24	Jeffrey Shaw	Analyzed Oberhansly claim.	1.90	375.00	712.50
09/30/24	Jeffrey Shaw	Reviewed and prepared Oberhansly schedules.	1.40	375.00	525.00
		Total for Task Code 500	**207.50**		**77,900.50**
Task Code: 600 - Tax Compliance & Analysis					
07/15/24	Leif Larsen	Instructed staff on preparation of 2nd quarter 2024 payroll returns.	0.50	375.00	187.50
07/15/24	Jeffrey Stouffer	Prepared SUTA, 941, and Utah Withholdings forms for 2nd quarter of 2024.	1.60	225.00	360.00
07/16/24	Vernon Calder	Attended meeting regarding tax issues related to Ponzi Scheme Clawback payments to the Receivership.	0.50	455.00	227.50
07/16/24	Vernon Calder	Performed tax research regarding tax provisions related to Clawback payments in a Ponzi Scheme.	0.60	455.00	273.00
07/16/24	Leif Larsen	Prepared for and participated in conference call regarding tax issues related to net winner settlement agreements.	1.50	375.00	562.50
07/17/24	Vernon Calder	Reviewed Larson Settlement Agreement to identify any potential tax issues to the Receivership.	0.20	455.00	91.00
07/17/24	Leif Larsen	Reviewed settlement agreement to look for potential tax issues that may arise as a result of the agreement.	0.80	375.00	300.00
07/18/24	Leif Larsen	Analyzed tax payment coupons and instructed staff on submission to proper taxing authorities.	0.20	375.00	75.00

BRG INVOICE

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

Invoice # 10005706
Client-Project: 016222-025457

Date	Name	Description	Hours	Rate	Amount
Task Code: 600 - Tax Compliance & Analysis					
07/22/24	Leif Larsen	Analyzed correspondence received and contacted the state of Utah to remove new hire reporting requirements for the receivership.	1.10	375.00	412.50
07/23/24	Leif Larsen	Contacted the Department of Workforce Services in order to clear requirements related to the filing of New Hire Reports.	0.90	375.00	337.50
07/25/24	Leif Larsen	Prepared and submitted the 2024 second quarter SUTA wage report.	1.50	375.00	562.50
07/25/24	Leif Larsen	Reviewed and finalized the 2024 second quarter Form 941.	0.80	375.00	300.00
07/25/24	Leif Larsen	Prepared and submitted the 2024 second quarter Utah withholding return.	1.40	375.00	525.00
07/26/24	Jeffrey Shaw	Reviewed tax issues and prepared email to Receiver regarding the same.	0.80	375.00	300.00
07/26/24	Jeffrey Shaw	Follow-up with tax professionals regarding payroll tax issues.	0.50	375.00	187.50
07/29/24	Kellee Calder	Prepared payroll tax returns for the receiver's review and required signatures for 2024 941 2nd Quarter.	0.20	150.00	30.00
07/29/24	Jeffrey Shaw	Follow-up with Receiver regarding tax issues.	0.20	375.00	75.00
		Total for Task Code 600	**13.30**		**4,806.50**
Task Code: 950 - Fee Application Preparation & Hearing					
08/19/24	Jeffrey Shaw	[NC] Follow-up regarding status of fee application.	0.30	0.00	0.00
08/19/24	Jeffrey Shaw	[NC] Reviewed Q2 pre-bill and dealt with billing issues.	1.30	0.00	0.00
08/19/24	Jeffrey Shaw	[NC] Reviewed and revised Q2 time entries and descriptions.	0.30	0.00	0.00
08/21/24	Jeffrey Shaw	[NC] Reviewed and revised time entries and descriptions for Apr-Jun.	1.90	0.00	0.00
08/23/24	Jeffrey Shaw	[NC] Reviewed and updated time entries and descriptions for Q2.	0.80	0.00	0.00
08/27/24	Jeffrey Shaw	[NC] Reviewed, finalized and submitted Q2 bill.	0.70	0.00	0.00
08/27/24	Jeffrey Shaw	[NC] Prepared fee application narrative for Q2.	1.00	0.00	0.00
		Total for Task Code 950	**6.30**		**0.00**
Professional Services			**241.40**		**88,069.50**

EXHIBIT D

EXHIBIT D

TWENTY-FOURTH INTERIM FEE APPLICATION

Time Records of Arizona Counsel

EXHIBIT D

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

August 08, 2024
Client: PA123
Matter: 00008
Invoice #: 1307602

Page: 1

RE: Gretchen Howell BK - Jonathan Hafen Creditor

For Professional Services Rendered Through July 31, 2024

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
07/03/2024	JSS	Emails and call with J. Balls, M. Harris re: court approval for fees, 10th circuit request.	0.50	$400.00	$200.00
07/05/2024	JSS	[NO CHARGE] Receive notice of chapter 13.	0.10	$0.00	$0.00
07/16/2024	JSS	Review notice of chapter 13 case; calender deadlines.	0.20	$400.00	$80.00
07/21/2024	JSS	Review motion to lift stay, plan and related documents.	0.50	$400.00	$200.00
07/22/2024	JSS	Review re: motion to lift stay; case law; analysis; plan provision to avoid lien; later zoom call with J. Covey, M. Balls and J. Balls re: appeal, bond, debtor relief from stay, dismissal, debt limit, bad faith, judgment lien, our motion for relief from stay and related issues; confer with attorneys P. Rudd and R. Nussbaum re: same; email to Covey, Balls and Balls re: same and next steps including plan objection and proof of claim; prepare, file and serve notice of appearance.	3.00	$400.00	$1,200.00
07/22/2024	PRR	Analyze and evaluate stay relief issues and confer with J. Samuelson regarding same.	0.50	$560.00	$280.00
07/22/2024	RXN	Conversation with Jim on pursuing debtor.	0.40	$590.00	$236.00
07/24/2024	JSS	Research re: motion to dismiss re: eligibility; email to client re: same and suggested next steps; begin draft motion to dismiss.	2.50	$400.00	$1,000.00

SacksTierney P.A.
ATTORNEYS

August 08, 2024
Client: PA123
Matter: 00008
Invoice #: 1307602

SERVICES

Date		Description of Services	Hours	Rate	Amount
07/25/2024	JSS	Continue work on Motion to Dismiss; call with attorneys J. Covey and J. Balls re: judgment, equitable argument, property and related issues; review title report and brokers price opinion, draft Objection to Motion for Relief from Stay; edits to same; email to Covey and Balls with drafts for review.	4.50	$400.00	$1,800.00
07/26/2024	JSS	Emails with attorney J. Covey and J. Balls re: objection to motion for relief from stay and motion to dismiss; review redline from Covey; confer with attorney R. Nussbaum re: bankruptcy issues.	1.00	$400.00	$400.00
07/28/2024	JSS	[NO CHARGE] Email to attorney R. Nussbaum re: response to motion for relief from stay and motion to dismiss.	0.20	$0.00	$0.00
07/28/2024	RXN	Review all; Research and send summary.	1.00	$590.00	$590.00
07/29/2024	JSS	Additional revisions and edits to motion to dismiss (add new section on bad faith) and to objection to motion for relief from stay; email and call with attorney R. Nussbaum re: same; email to J. Balls and J. Covey with revised motions and request for review.	4.60	$400.00	$1,840.00
07/29/2024	RXN	Review proposed filings and discuss with Jim.	0.80	$590.00	$472.00
07/30/2024	JSS	Emails with attorney J. Balls re: final drafts, requested information and related matters; review, edit and finalize draft motion to dismiss (with exhibit) and objection to motion for relief from stay; file and serve same; preparation of hearing notebook, email to chambers re: appearance; emails with attorney J. Covey re: 341 hearing, plan objection and related matters; call to attorney M. Galen re: Zions statement.	3.20	$400.00	$1,280.00
07/31/2024	JSS	Prepare for hearing on debtor's motion for relief from stay; travel to courthouse and attend hearing; confer with attorney J. Kahn prior to hearing; travel to work station; email to attorney's J. Ball and J. Covey; re: summary; review minute entry order, send same to Ball and Covey; later email from Covey re: motion for accelerated hearing begin draft motion and order, email from attorney J. Kahn with request for order approval; email to Covey re: same.	4.40	$400.00	$1,760.00
		Total Professional Services	27.40		$11,338.00

SacksTierney P.A.
ATTORNEYS

August 08, 2024
Client: PA123
Matter: 00008
Invoice #: 1307602

SUMMARY

		Hours	Rate	Amount
JSS	James Scott Samuelson	0.30	$0.00	$0.00
JSS	James Scott Samuelson	24.40	$400.00	$9,760.00
PRR	Philip R. Rudd	0.50	$560.00	$280.00
RXN	Randy X. Nussbaum	2.20	$590.00	$1,298.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
07/31/2024	James Samuelson- Travel Expenses- Samuelson - 7/31/24 parking - Bankruptcy Court Hearing	$8.00
	Total Disbursements	$8.00

Total Services	$11,338.00	
Total Disbursements	$8.00	
Total Current Charges		$11,346.00
PAY THIS AMOUNT		**$11,346.00**

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

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

October 21, 2024
Client: PA123
Matter: 00008
Invoice #: 1309542

Page: 1

RE: Gretchen Howell BK - Jonathan Hafen Creditor

For Professional Services Rendered Through August 31, 2024

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
07/02/2024	JSS	Review notice of appearance file same; Parr Brown - Gretchen Howell BK.	0.20	$400.00	$80.00
08/01/2024	JSS	Voicemail to and email with trustee attorney R. Flinn re: motion to dismiss; email to attorney J. Kahn re: proposed order; later receive notice of lodging order lifting stay.	0.50	$400.00	$200.00
08/02/2024	JSS	Prepare motion to accelerate hearing and proposed order; file, lodge and serve same; later docket entry from Court setting hearing; later order from court denying motion to accelerate; note to legal assistant re: follow up with chambers on order; email to client with update; call with chapter 13 trustee lawyer R. Flinn re: Motion.	1.80	$400.00	$720.00
08/07/2024	JSS	Additional research re: eligibility issue.	1.00	$400.00	$400.00
08/11/2024	JSS	Review re: motion to dismiss, arguments.	0.50	$400.00	$200.00
08/12/2024	JSS	Review additional case law; email to clients.	1.00	$400.00	$400.00
08/13/2024	JSS	Additional Lexis research re: Monroe case; review Colliers summary and related cases.	1.40	$400.00	$560.00
08/14/2024	JSS	Continued research re: eligibility limits; emails with attorney J. Kahn re: response, later receive and read response, email to clients re: same.	1.50	$400.00	$600.00
08/14/2024	RXN	Strategize with Jim on response.	0.30	$590.00	$177.00
08/16/2024	JSS	Reivew email and attachment from attorney J. Balls.	0.30	$400.00	$120.00

SacksTierney P.A.
ATTORNEYS

October 21, 2024
Client: PA123
Matter: 00008
Invoice #: 1309542

SERVICES

Date		Description of Services	Hours	Rate	Amount
08/19/2024	JSS	Review re: two party disputes; legal research re: same; call with J. Balls and J. Covey; work on Reply in support of motion to dismiss; proof of claim.	3.20	$400.00	$1,280.00
08/19/2024	SED	Call from J. Samuelson regarding objection to plan; review email regarding claim.	0.30	$240.00	$72.00
08/20/2024	JSS	Work on draft Reply, claim and plan objection.	1.00	$400.00	$400.00
08/21/2024	JSS	Work on reply in support of motion to dismiss; proof of claim.	1.30	$400.00	$520.00
08/21/2024	SED	Review plan, comments and commence work on the objection.	0.60	$240.00	$144.00
08/22/2024	JSS	Work on proof of claim and attachment; emails with client re: same; work on reply.	1.00	$400.00	$400.00
08/22/2024	SED	Review additional filings and continue to work on the plan objection.	0.80	$240.00	$192.00
08/23/2024	JSS	Work on Reply to Motion to Dismiss.	1.60	$400.00	$640.00
08/23/2024	SED	Review the liquidation analysis and continue to work on the draft plan objection (Actual time 1.6; billed time 1.0).	1.00	$240.00	$240.00
08/23/2024	SED	Continue to work on the draft plan objection.	2.10	$240.00	$504.00
08/25/2024	JSS	Continued research re: eligibility, bad faith; continue work on reply in support of motion to dismiss; email draft to legal assistant for formatting and to paralegal and attorney R. Nussbaum for comment. (Actual time 6.5; billed time 6.0).	6.00	$400.00	$2,400.00
08/26/2024	JSS	Work on objection to plan and continued work on reply; send draft objection and reply to client; emails re: proof of claim, finalize claim and attachments; emails from attorney R. Nussbaum re: draft reply and objection; email from attonrey J. Balls re: claim and draft documents.	2.30	$400.00	$920.00
08/26/2024	RXN	Work on reply.	0.60	$590.00	$354.00
08/27/2024	JSS	Final review and edits to draft Reply and Objection; instructions to legal assistant re: same; email from and to attorney J. Covey re: suggested language.	1.20	$400.00	$480.00
08/27/2024	SED	Review and provide comments and edits to the plan objection and reply (0.8); review multiple exchanges regarding same (0.2).	1.00	$240.00	$240.00
08/28/2024	JSS	Final review and edits to Reply in support of Motion to Dismiss with Prejudice, Objection to Chapter 13 Plan and proof of claim; file and serve same.	1.60	$400.00	$640.00

SacksTierney P.A.
ATTORNEYS

October 21, 2024
Client: PA123
Matter: 00008
Invoice #: 1309542

SERVICES

Date		Description of Services	Hours	Rate	Amount
08/29/2024	JSS	Prepare hearing notebook.	0.70	$400.00	$280.00
08/30/2024	JSS	Review re: upcoming oral argument; review claims registrar.	1.00	$400.00	$400.00
08/31/2024	JSS	Review re: upcoming oral argument.	1.00	$400.00	$400.00
		Total Professional Services	36.80		$13,963.00

SUMMARY

		Hours	Rate	Amount
JSS	James Scott Samuelson	30.10	$400.00	$12,040.00
RXN	Randy X. Nussbaum	0.90	$590.00	$531.00
SED	Sandra E. Dousdebes	5.80	$240.00	$1,392.00

Total Services	$13,963.00	
Total Current Charges		$13,963.00
Previous Balance		$11,346.00
PAY THIS AMOUNT		**$25,309.00**

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

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101 South 200 East Ste. 700
Salt Lake City, UT 84111
Attention: Jeff Balls

October 21, 2024
Client: PA123
Matter: 00008
Invoice #: 1309543

Page: 1

RE: Gretchen Howell BK - Jonathan Hafen Creditor

For Professional Services Rendered Through September 30, 2024

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
09/04/2024	JSS	Continue preparation for oral argument on motion to dismiss; travel to court; argue motion to dismiss; travel to work station; email to attorney's J. Covey and J. Balls re: same.	4.50	$400.00	$1,800.00
09/11/2024	JSS	Review and email to J. Balls and J. Covey re: deadline to file adversary complaint.	0.50	$400.00	$200.00
09/12/2024	JSS	Email from J. Covey re: adversary deadline.	0.10	$400.00	$40.00
09/13/2024	JSS	Review docket.	0.20	$400.00	$80.00
09/27/2024	JSS	Receive and review late filed proof of claim filed by debtor for JP Morgan Chase.	0.20	$400.00	$80.00
09/30/2024	JSS	Receive and review trustee recommendation; notice from court re: counseling course.	0.70	$400.00	$280.00
		Total Professional Services	6.20		$2,480.00

SUMMARY

		Hours	Rate	Amount
JSS	James Scott Samuelson	6.20	$400.00	$2,480.00

Total Services	$2,480.00	
Total Current Charges		$2,480.00
Previous Balance		$25,309.00
PAY THIS AMOUNT		**$27,789.00**

SacksTierney P.A.
ATTORNEYS

October 21, 2024
Client: PA123
Matter: 00008
Invoice #: 1309543

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

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Jeffery A. Balls (12437) (jballs@parrbrown.com)
Walter O. Peterson (17300) (wpeterson@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-FOURTH INTERIM FEE APPLICATION

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

Judge Tena Campbell

Magistrate Judge Dustin Pead

Before the Court is the twenty-fourth 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 July 1, 2024, through September 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:	$27,648.00 for fees and expenses.
b.	Parr Brown:	$225,954.47 for fees and expenses.
c.	BRG:	$88,069.50 for fees and expenses.
d.	Arizona Counsel:	$27,789.00 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 December 2024.

Honorable Dustin B. Pead
United States Magistrate Judge