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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-FIFTH 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-fifth 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 October 1, 2024, through December 31, 2024 (the “Application Period”). The Receiver seeks authorization to pay all allowed fees and expenses from the Receivership Estate once the Receiver has recovered an amount equal to three times the fees requested in this Fee Application and allowed in prior applications. In support hereof, the Receiver states as follows:

I. RELEVANT BACKGROUND

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

2. The Receiver has filed his *Twenty-Fifth Quarterly Status Report*, which includes a status report for the period of October 1, 2024, through December 31, 2024 (the “Quarterly Status

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

II. REQUEST FOR COURT APPROVAL OF FEES AND EXPENSES

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

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

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

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

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

5. During this Application Period, the Receiver and his professionals have provided actual and necessary services for the Receivership Estate as summarized below and detailed in the 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. 560 filed January 30, 2025.

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 October 1, 2024, through December 31, 2024, the Receiver billed a total of 67.2 hours for services to the Receivership Estate. The Receiver is seeking

approval for the payment of fees and expenses totaling \$32,256.00. *See Exhibit A.*

b. Parr Brown: From October 1, 2024, through December 31, 2024, Parr Brown billed a total of 410.8 hours for legal services to the Receivership Estate. Parr Brown is seeking approval for the payment of fees and expenses totaling \$141,645.25. *See Exhibit B.* These amounts include a voluntary write down of \$9,835.00.

c. BRG: From October 1, 2024, through December 31, 2024, BRG billed a total of 248.6 hours providing forensic, tax, and general accounting services to the Receivership Estate. BRG is seeking approval for the payment of fees and expenses totaling \$92,536.00. *See Exhibit C.* These amounts include a voluntary write down of \$825.00.

d. Arizona Counsel: From October 1, 2024, through December 31, 2024, Arizona Counsel billed a total of 14.7 hours for legal services to the Receivership Estate. Arizona Counsel is seeking approval for the payment of fees and expenses totaling \$5,890.00. *See Exhibit D.*

11. The amounts requested reflect a total of \$10,660.00 in voluntary reductions by the respective professionals in an exercise of their billing judgment.

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

V. SUMMARY OF EXHIBITS

13. Professional services have been recorded contemporaneously with services being

rendered and these services, as well as the expenses incurred, are detailed in the attached Exhibits described below.

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

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

Exhibit A—Time Records of Receiver

Exhibit A Summary by Task

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

Exhibit A-1 Administration of Receivership Estate

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

Exhibit A-2 Asset Analysis and Recovery

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

Receiver continued coordinating with investors and their counsel to substantiate various metal transactions that were associated with such investors.

Exhibit A-3 Claims Administration

19. The Receiver and his team have completed the claims analysis process and are focused on resolving all remaining outstanding claims. Having resolved the vast majority of the claims, and as set forth in more detail in the Quarterly Status Report, the Receiver made a second interim distribution to Class 4 Claimants in the amount of \$5,892,244.83. This second interim distribution brought Class 4 claimants to 30% recovery under the court-approved rising tide methodology.

Exhibit B-Time Records of Parr Brown

Exhibit B Summary by Task

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

Exhibit B-1 Administration of Receivership Estate

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

Exhibit B-2 Asset Analysis & Recovery

22. During the Application Period, Parr Brown continued to work the numerous claw back actions filed against scores of investors (the "Claw Back Defendants"). Parr Brown also continued working with the many potential net winners (the "Net Winners") with whom they

executed tolling agreements in order to facilitate further discussions and negotiations regarding their transactions with the Receivership Defendants. As a result of the Court granting the Receiver's Motion for Settlement Authority (*See* Dkt. No. 271), and the Receiver's ongoing settlement efforts, the Receiver recovered approximately \$196,800 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

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

Exhibit B-5 Claims Administration

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

Parr Brown also worked closely with the Receiver to make a second interim distribution to Class 4 Claimants in the amount of \$5,892,244.83, bringing the total amount distributed to Claimants to nearly twenty-eight million dollars.

Exhibit C-Time Records of BRG

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

Claims Process & Distribution

26. Pursuant to the Receiver's request, BRG performed analysis to assist the Receiver in determining the amount of the 2nd distribution of Receivership funds to investors. Based on the instructions of the Receiver, BRG reviewed and updated its distribution model to reflect the distribution amount determined by the Receiver and calculated the amount to be distributed to each investor. BRG prepared distribution schedules which were utilized by the Receiver to make the 2nd distribution. BRG 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

27. BRG has continued to be involved in assisting the Receiver in various litigation matters. BRG has analyzed the activity and transactions, including supporting documents, for various investors for whom the Receiver has filed clawback actions. BRG has met with the Receiver and his counsel to discuss various issues associated with these matters. BRG has also prepared support, declarations, expert reports and exhibits in connection with various of these litigation matters in which the Receiver is involved.

28. 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

29. BRG reviewed, prepared, and submitted the required filings for the federal and state payroll tax returns for Q3 and Q4 2024 in connection with the distributions made related to the wage claims of former employees of Rust Rare Coin. BRG has also reviewed and responded to Receiver inquiries regarding various tax issues as requested.

Exhibit D-Time Records of Arizona Counsel

30. 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

31. The Receiver has previously filed twenty-two interim fee applications,² all of which

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

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, 554 and 558. This is the Twenty-Fifth Interim Fee Application of the Receiver and his professionals. The Receiver and his professionals understand that the authorization and payment of fees and expenses is interim in nature. All fees and expenses allowed on an interim basis will be subject to final review at the close of the case and the discharge of the Receiver when the Receiver files a final accounting and the Receiver and his professional's file final fee applications.

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

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. The Receiver's Twenty-Fourth Interim Fee Application was filed on December 16, 2024. *See* Dkt. No. 557.

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 \$32,256.00; Parr Brown's fees and expenses in the amount of \$141,645.25; BRG's fees and expenses in the amount of \$92,536.00; Arizona Counsel's fees and expenses in the amount of \$5,890.00, 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 21st day of March 2025.

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-FIFTH INTERIM FEE APPLICATION** was (1) electronically filed with the Clerk of the Court through the CM/ECF system on March 21, 2025, which sent notice of the electronic filing to all counsel of record, (2) posted on the Receiver’s website (rustrarecoinreceiver.com), and (3) emailed to all those on the Receiver’s master mailing matrix.

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<p>David C. Castleberry OGLETREE DEAKINS NASH SMOAK & STEWART PC 2050 S 1300 E STE 500 SALT LAKE CITY, UT 84106 (801)658-6100 david.castleberry@ogletreedeakins.com</p>	

/s/ Lori Stumpf

EXHIBIT A

EXHIBIT A

TWENTY-FIFTH INTERIM FEE APPLICATION

Time Records of Receiver

EXHIBIT A



Rust Rare Coin Receiver

February 10, 2025

Invoice: 957863
Client: 177110
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration

Professional Services	\$ 8,160.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 8,160.00



PARR BROWN GEE & LOVELESS

Invoice: 957863
 Rust Rare Coin Receiver
 Administration

February 10, 2025
 Client: 177110
 Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/03/24	JOH	Prepare for and attend meeting re receivership status; Review related documents; Attention to two clawback actions; Meet and Email with legal counsel re various matters	3.10	1,488.00
10/25/24	JOH	Follow up re corporate transparency act and related matters; Research re same; Email with legal counsel re same; Email with legal team re appointment of personal representative and related matters; Attention to clawback action; Research re same	2.50	1,200.00
10/29/24	JOH	Attention to tax matters; Meet with legal counsel re clawback action; Review related documents	1.20	576.00
10/30/24	JOH	Attention to tax matter; Review quarterly report; Email with legal counsel re same; Follow up re potential for interim distribution and related matters; Review documents; Attention to potential settlement of clawback action; Email with legal counsel re same	1.80	864.00
10/31/24	JOH	Review tax document; Final review of quarterly report; Email with legal counsel re same; Attention to potential settlement of clawback claim; Review related documents	1.10	528.00
11/12/24	JOH	Review documents relating to group of clawback cases and analyze potential settlement strategies; Follow up re FinCen ID; Follow up re obtaining ID; Email with legal counsel re same	3.10	1,488.00
11/13/24	JOH	Follow up re FinCen ID and related matters; Review documents relating to clawback action litigation	1.10	528.00
11/20/24	JOH	Prepare for and attend meeting with media member re case background; Follow up re potential settlement of clawback action; Review related documents	2.30	1,104.00
12/20/24	JOH	Attention to public notice of distribution; Email with CFTC re same; Email with legal counsel re same; Follow up on status of clawback settlement; Review related documents and email correspondence	.80	384.00

TOTAL PROFESSIONAL SERVICES \$ 8,160.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	480.00	17.00	8,160.00
TOTALS		17.00	\$ 8,160.00

TOTAL THIS INVOICE \$ 8,160.00

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

February 10, 2025

Rust Rare Coin Receiver

Invoice: 957863
Client: 177110
Matter: 1

REMITTANCE ADVICE

RE: Administration

BALANCE DUE THIS INVOICE \$ 8,160.00

Please return this advice with payment to:

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

Wire Transfer Instructions

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

E-Check

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

EFT/ACH Pay Instructions

Routing #: 124001545
Account #: 912454114

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

Please reference your invoice # 957863

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





Rust Rare Coin Receiver

February 10, 2025

Invoice: 957864
Client: 177110
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Assett Analysis & Recovery

Professional Services	\$ 20,784.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 20,784.00



PARR BROWN GEE & LOVELESS

Invoice: 957864
 Rust Rare Coin Receiver
 Asset Analysis & Recovery

February 10, 2025
 Client: 177110
 Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/01/24	JOH	Follow up re clawback action; Attention to media inquiry	.90	432.00
10/02/24	JOH	Prepare for and participate in meeting with opposing counsel re clawback actions; Review related documents and email communications; Meeting with legal counsel re various matters; Follow up re media inquiry	2.60	1,248.00
10/08/24	JOH	Attention to three clawback actions; Meet with legal counsel re various matters	1.20	576.00
10/11/24	JOH	Attention to clawback litigation issues; Follow up re media inquiry; Review documents and legal authorities	3.20	1,536.00
10/16/24	JOH	Attention to three clawback actions; Review related documents; Email with legal counsel re clawback litigation issue	2.40	1,152.00
10/18/24	JOH	Attention to three clawback actions; Email re media inquiry; Review documents and emails	1.40	672.00
10/22/24	JOH	Follow up re real property claim; Attention to clawback action; Email with legal counsel and Review documents; Follow up re potential settlement of clawback action; Follow up re claims matter	2.30	1,104.00
10/23/24	JOH	Attention to clawback action; Follow up re potential settlement of litigation; Review related documents; Email with legal counsel; Follow up re claims inquiry	1.30	624.00
10/24/24	JOH	Further attention to resolving multiple clawback claims; Review related documents and email correspondence; Follow up with legal counsel re response to proposed settlement offer	1.80	864.00
10/28/24	JOH	Attention to clawback action; Review draft settlement documents and related email correspondence; Follow up re same	.90	432.00
11/04/24	JOH	Attention to multiple clawback claims; Prepare for and attend meeting with legal team re potential for distribution to victims by end of year and related matters	1.80	864.00
11/06/24	JOH	Prepare for and attend meeting with legal counsel and accounting experts re various clawback actions; Follow up re potential approach to resolving claims; Analyze claims; Attention to discovery matter in clawback action; Follow up re potential settlement of clawback action; Review related email correspondence and documents	4.30	2,064.00
11/08/24	JOH	Attention to various clawback actions; Review related documents and email correspondence	1.90	912.00
11/11/24	JOH	Attention to two clawback action; Analyze related documents; Email with client re settlement of additional clawback action	2.40	1,152.00
11/14/24	JOH	Attention to media inquiry; Review probate notice; Follow up with legal counsel re same; Follow up re group of clawback actions; Review related documents	1.40	672.00
11/15/24	JOH	Analyze appellate opinion; Email with legal counsel re same; Attention to clawback action; Email with legal counsel re potential settlement of clawback action	3.30	1,584.00

PARR BROWN GEE & LOVELESS

Invoice: 957864
 Rust Rare Coin Receiver
 Asset Analysis & Recovery

February 10, 2025
 Client: 177110
 Matter: 2

Date	Tkpr	Description	Hours	Amount
11/19/24	JOH	Attention to clawback action	.80	384.00
11/21/24	JOH	Review initial disclosures by each side in clawback action	.20	96.00
11/25/24	JOH	Attention to two clawback actions; Email with legal counsel re potential settlement of clawback action; Review documents relating to same	1.40	672.00
12/02/24	JOH	Attention to clawback action; Review related email correspondence and documents	.40	192.00
12/04/24	JOH	Review clawback settlement agreement and related email correspondence and documents; Email with legal counsel re same; Follow up re potential year-end distribution to victims	.70	336.00
12/06/24	JOH	Attention to two clawback actions; Review related documents; Follow up re path for distribution to victims; Email with legal counsel re potential settlement	1.30	624.00
12/10/24	JOH	Attention to potential settlement of clawback action	.20	96.00
12/11/24	JOH	Attention to clawback action	.70	336.00
12/19/24	JOH	Attention to clawback action; Review related email correspondence and documents	.80	384.00
12/30/24	JOH	Call with legal counsel re clawback action; Attention to clawback settlement and related matters; Review prior email correspondence re same; Review email correspondence from clawback defenda	1.70	816.00
12/31/24	JOH	Attention to clawback action; Review email correspondence from clawback defendant; Follow up with legal counsel re same; Review prior correspondence and documents	2.00	960.00

TOTAL PROFESSIONAL SERVICES \$ 20,784.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	480.00	43.30	20,784.00
TOTALS		43.30	\$ 20,784.00

TOTAL THIS INVOICE \$ 20,784.00

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

February 10, 2025

Rust Rare Coin Receiver

Invoice: 957864
Client: 177110
Matter: 2

REMITTANCE ADVICE

RE: **Assett Analysis & Recovery**

BALANCE DUE THIS INVOICE

\$ 20,784.00

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 # 957864

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





February 10, 2025

Rust Rare Coin Receiver

Invoice: 957865
Client: 177110
Matter: 5

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Claims Administration

Professional Services	\$ 3,312.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 3,312.00



PARR BROWN GEE & LOVELESS

Invoice: 957865
 Rust Rare Coin Receiver
 Claims Administration

February 10, 2025
 Client: 177110
 Matter: 5

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
12/05/24	JOH	Further attention to potential distribution; Review documents relating to clawback action; Follow up with legal counsel re potential settlement of clawback action; Review related documents; Email with legal counsel re potential distribution	1.50	720.00
12/16/24	JOH	Further Attention to potential distribution; Review related document	.50	240.00
12/17/24	JOH	Further follow up re potential distribution; Attention to potential settlement of clawback action; Review related document and email correspondence	.90	432.00
12/18/24	JOH	Attention to clawback action; call with related counsel re same; Follow up with legal counsel re same; Review related documents; Attention to public notification of distribution; Review court notice	1.80	864.00
12/23/24	JOH	Attention to distribution; Call with legal counsel re same; Review related documents; Follow up re clawback settlement; Follow up re public notice of distribution; Review and revise comments to same; Interview with media member re same; Email with financial institution re authorizing distribution	2.20	1,056.00

TOTAL PROFESSIONAL SERVICES \$ 3,312.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	480.00	6.90	3,312.00
TOTALS		6.90	\$ 3,312.00

TOTAL THIS INVOICE \$ 3,312.00

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

February 10, 2025

Rust Rare Coin Receiver

Invoice: 957865
Client: 177110
Matter: 5

REMITTANCE ADVICE

RE: Claims Administration

BALANCE DUE THIS INVOICE \$ 3,312.00

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

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EXHIBIT B

EXHIBIT B

TWENTY-FIFTH INTERIM FEE APPLICATION

Time Records of Parr Brown

EXHIBIT B



Rust Rare Coin Receivership

February 10, 2025

Invoice: 957860
Client: 176430
Matter: 1

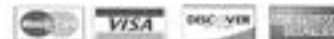
INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration of Receivership Estate

Professional Services	\$ 6,161.50
Total Costs Advanced	<u>\$ 58.32</u>
TOTAL THIS INVOICE	\$ 6,219.82



PARR BROWN GEE & LOVELESS

Invoice: 957860
 Rust Rare Coin Receivership
 Administration of Receivership Estate

February 10, 2025
 Client: 176430
 Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/03/24	WOP	Review docket; Correspond with various attorneys re new developments to be included in quarterly report; Review attorney time sheets	3.80	1,197.00
10/04/24	JMC	Correspond with Jeff Balls re transfer of claim	.10	46.00
10/07/24	JMC	Correspond with Jeff Balls re claim transfer issues	.10	46.00
10/17/24	WOP	Review status of pending claims; Review records re amount recovered by receiver; Continue draft of quarterly report; Correspond with Joe re same	3.40	1,071.00
10/18/24	JMC	Correspond with Walter Peterson re quarterly report	.20	92.00
10/21/24	WOP	No Charge - Correspond with Arizona counsel re fee application; Search for invoices re same; Correspond with BRG and conflict receiver re invoices	1.10	N/C
10/21/24	WOP	Continue draft of quarterly report	3.10	976.50
10/22/24	WOP	Correspond with Kathy re quarterly ledger; Review and analyze the same; Revise and finalize draft of quarterly report; Create exhibits; Email correspondence with Jeff; email correspondence with Joe	4.40	1,386.00
10/23/24	JMC	Correspond with Walter Peterson re quarterly report and related issues	.20	92.00
10/24/24	WOP	No Charge - Continue redaction of attorney time sheets	3.20	N/C
10/25/24	JMC	Correspond with Jeff Balls re receivership compliance issues	.20	92.00
10/25/24	WOP	No Charge - Correspond with Arizona counsel re fees; Review invoices; Further correspondence re same	.80	N/C
10/28/24	JMC	Correspond with Lori Stumpf re CD Baby and related payments to the estate and other matters	.50	230.00
10/28/24	WOP	No Charge - Continue redaction of time sheets; Correspond with Arizona counsel	1.80	N/C
10/30/24	JMC	Correspond with Jeff Balls re various clawback actions, the quarterly report and claims	.80	368.00
10/30/24	WOP	No Charge - Review and redact BRG time records; Continue draft of fee application	.90	N/C
10/31/24	WOP	No Charge - Perform second audit of attorney time sheets; Correspond with conflict receiver; Correspond with Caralee; Correspond with BRG; Continue drat of fee application	2.20	N/C
11/01/24	CMM	Communicate with Receiver and legal team re meeting about additional distribution and remaining liability	.20	59.00
11/04/24	JMC	Meeting with Jon Hafen, Jeff Balls and Claire McGuire re distribution and resolution of ancillary proceedings	.80	368.00
11/04/24	WOP	No Charge - Review revised invoices; Email correspondence with Caralee re same; Call with Jeff Balls re travel expenses; Further correspondence with Caralee	.80	N/C
11/05/24	WOP	No Charge - Attend to various tasks re preparation of fee application	.80	N/C
11/06/24	WOP	No Charge - Attend to various tasks to prepare fee application	2.70	N/C

PARR BROWN GEE & LOVELESS

Invoice: 957860
 Rust Rare Coin Receivership
 Administration of Receivership Estate

February 10, 2025
 Client: 176430
 Matter: 1

Date	Tkpr	Description	Hours	Amount
11/08/24	JMC	Review and analyze deposits received into Rust	.10	46.00
11/08/24	WOP	No Charge - Attend to fee application	.70	N/C
11/12/24	WOP	No Charge - Continue draft of fee application; Prepare exhibits	1.50	N/C
11/13/24	WOP	No Charge - Revise draft of fee application; Review Arizona Counsel's time records; Draft email to Arizona Counsel re consolidated invoice	2.80	N/C
11/14/24	WOP	No Charge - Attend to fee application	.20	N/C
11/15/24	WOP	No Charge - Revise exhibits re new invoice from Arizona Counsel; Review exhibits of fee applications	1.80	N/C
11/18/24	WOP	No Charge - Correspond with BRG; Redact attorney time sheets	.70	N/C
11/19/24	WOP	No Charge - Attend to fee application	.40	N/C
11/20/24	JMC	No Charge - Correspond with Jeff Balls re fee application and related issues	.30	N/C
11/20/24	WOP	No Charge - Attend to fee application	3.60	N/C
11/21/24	WOP	No Charge - Continue draft of fee application; Review and redact time sheets; Call with Jeff Balls; Emails re same	1.60	N/C
11/22/24	JMC	No Charge - Correspond with Walter Peterson re fee application	.10	N/C
11/22/24	WOP	No Charge - Prepare all exhibits for fee application; Email correspondence with Jeff; Revise application; Draft proposed order	.40	N/C
11/29/24	JAB	No Charge - Review application for attorney fees	.50	N/C
12/02/24	WOP	No Charge - Correspond with Matt re invoices for fee application; Review the same	.30	N/C
12/04/24	JAB	No Charge - Revise attorney fees application; Correspond with Jonathan Hafen and Joseph Covey re same	.70	N/C
12/04/24	WOP	No Charge - Office conference with Jeff re changes needed to fee application; Office conference with Caralee re same and printing new invoices; Revise fee application; Create new exhibits; Revise proposed order; Additional call with Jeff; Revise exhibit B	2.60	N/C
12/05/24	JMC	No Charge - Review and finalize Rust fee application; Correspond with the government re review and approval; Correspond with Jeff Balls re distribution	1.10	N/C
12/06/24	JMC	Review and analyze receipts report from Kathy Bates	.10	46.00
12/10/24	JMC	No Charge - Correspond with Tom Simek re Rust fee application	.10	N/C
12/16/24	JMC	No Charge - Correspond with Jennifer Korb re fee application; Coordinate finalizing and filing fee application with the court	.30	N/C
12/17/24	JMC	No Charge - Correspond with Jim Samuelson re fee application	.20	N/C
12/18/24	WOP	No Charge - Review docket re approved fee application; Office conference with Joe re same; Conference with Kathy re timing of payments; Email to Arizona counsel re same	.60	N/C
12/20/24	JMC	Correspond with Jeff Balls re distribution	.10	46.00

TOTAL PROFESSIONAL SERVICES

\$ 6,161.50

PARR BROWN GEE & LOVELESS

Invoice: 957860
 Rust Rare Coin Receivership
 Administration of Receivership Estate

February 10, 2025
 Client: 176430
 Matter: 1

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	460.00	3.20	1,472.00
Walter O Peterson	315.00	14.70	4,630.50
Claire M McGuire	295.00	.20	59.00
TOTALS		18.10	\$ 6,161.50

COSTS ADVANCED

Date	Description	Amount
10/21/24	Grasshopper - Data storage	19.44
11/21/24	Grasshopper - Data storage	19.44
12/21/24	Grasshopper - Data storage	19.44
TOTAL COSTS ADVANCED		\$ 58.32
TOTAL THIS INVOICE		\$ 6,219.82



February 10, 2025

Rust Rare Coin Receivership

Invoice: 957860
Client: 176430
Matter: 1

REMITTANCE ADVICE

RE: Administration of Receivership Estate

BALANCE DUE THIS INVOICE \$ 6,219.82

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 # 957860

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

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

Rust Rare Coin Receivership

February 10, 2025

Invoice: 957861
Client: 176430
Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Asset Analysis & Recovery

Professional Services	\$ 127,892.00
Total Costs Advanced	<u>\$ 3,434.93</u>
TOTAL THIS INVOICE	\$ 131,326.93



PARR BROWN GEE & LOVELESS

Invoice: 957861
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

February 10, 2025
 Client: 176430
 Matter: 2

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/01/24	JMC	Correspond with Jack Nunn and Claire McGuire re research for Nelson lawsuit; Correspond with Jon Hafen re lawsuit	1.10	506.00
10/01/24	JAB	Correspond with Jeff Shaw; Review information re interest; Draft motion for summary judgment; Draft affidavit of Jeff Shaw	2.10	829.50
10/01/24	CMM	Review research on continuous concealment doctrine from Jack Nunn; Attorney conference with Joseph Covey and Jack Nunn re the same; Draft summary email to Receiver; Review discovery motion	3.60	1,062.00
10/01/24	JWN	Research cases involving discharges under 11 U.S.C.727(a)(2), the continuing concealment doctrine, and circumstances that constitute concealment with intent to hinder, delay, or defraud (6.5); Meet with Claire McGuire and Joseph Covey to discuss research (.6)	7.10	1,810.50
10/02/24	JMC	Correspond with Jon Hafen and Claire McGuire re Darrin Nelson lawsuit; Correspond with Claire McGuire and Jeremy Sink re settlement of lawsuit	.70	322.00
10/02/24	JAB	Correspond with Kristin Baughman; Review correspondence re bankruptcy; Review clawback status	.60	237.00
10/02/24	CMM	Research continuous concealment doctrine and factual underpinning of Nelson case; Draft summary of case for Receiver; Attorney conference with Joseph Covey and Jonathan Hafen related to Nelson bankruptcy; Research Nelson filings and representations; Communicate with Joseph Covey and opposing counsel re meet and confer; Research and draft motion to compel re to Receivers first set of discovery requests to Oberhansly; Draft proposed order for the same; Communicate with Robert Wing re filing of the same	9.30	2,743.50
10/02/24	JWN	Draft explanation for opposing counsel and the United States Trustee re pursuing claims under 11 U.S.C.727(a)(2)	2.00	510.00
10/03/24	JMC	Correspond with Jeremy Sink, Claire McGuire and Jeff Balls re Nelson lawsuit and settlement	1.40	644.00
10/03/24	JAB	Conference with Claire McGuire; Draft motion for default judgment; Review correspondence from Jeremy Sink; Conference with Rodger Burge	4.20	1,659.00
10/03/24	CMM	Communicate with opposing counsel re meet and confer; Prepare for and attend meet and confer; See to discovery issues; Attorney conference with Joseph Covey re the same; Research settlement issues; Prepare and review exhibits for Oberhansly motion to compel	4.80	1,416.00
10/04/24	JAB	Draft attorney planning meeting report; Conference with court clerk; Conference with Jeff Shaw	2.80	1,106.00
10/04/24	CMM	Communicate with Robert Wing re short form motion to compel; Revise and prepare the same for filing	1.20	354.00
10/04/24	RGW	Review and revise short form discovery order	.50	225.00
10/05/24	CY	Revise short form discovery motion; Email correspondence with Claire McGuire re same; File motion and order with the court; Email order to judge	.80	160.00

PARR BROWN GEE & LOVELESS

Invoice: 957861
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

February 10, 2025
 Client: 176430
 Matter: 2

Date	Tkpr	Description	Hours	Amount
10/07/24	JAB	Email claimant re transfer of claim; Telephone conference with Ryan Pahnke re potential settlement; Correspond with VonWin re transfer of claim	.90	355.50
10/07/24	CMM	Attorney conference with Jeffery Balls re potential settlements and overall Receivership issues; Research prohibited settlement amounts; Draft settlement communications with investors; Review order entered by Court related to in person hearing for motion to compel; Communicate with Robert Wing re the same; Review documents disclosed in initial disclosures by Oberhansly	4.60	1,357.00
10/08/24	JAB	Review correspondence re settlement; Review correspondence re attorney planning meeting report; Analyze claims	1.50	592.50
10/08/24	CMM	Research, analyze, and draft settlement and dismissal agreement in Nelson matter; Communicate re draft with Joseph Covey; Review documents sent by potential claw back investor re claims or lack of ownership	7.50	2,212.50
10/09/24	JAB	Review settlement payments; Telephone conference with Shaun Peck; Revise scheduling order and attorney planning meeting report; Draft motion for summary judgment	3.00	1,185.00
10/10/24	JAB	Review revised attorney planning meeting report; Finalize motion and proposed order re same	.40	158.00
10/11/24	JAB	Draft revised attorney planning meeting report; Review bank deposits	1.30	513.50
10/14/24	CMM	Draft settlement agreement with potential claw back defendants; Communicate with Robert Wing re opposition in Oberhansly; Research confession of judgement issues	7.10	2,094.50
10/15/24	JMC	Correspond with Jeff Balls re Arizona bankruptcy proceeding	.20	92.00
10/15/24	JAB	Draft motion for default judgment; Review clawback status	2.30	908.50
10/15/24	RGW	Emails re personal property sale from receivership	.20	90.00
10/16/24	JAB	Conference with Jeff Shaw; Draft affidavit of Jonathan O. Hafen; Correspond with Jonathan Hafen re same; Revise motion for default judgment	3.10	1,224.50
10/16/24	CMM	Research documents for Oberhansly matter; Prepare for upcoming hearing; Research settlement issues for Ault matter; Draft settlement agreement; Communicate with Joseph Covey re pending settlement agreement; Communicate with claw back defendant re settlement	5.90	1,740.50
10/16/24	RGW	Call with Claire McGuire re Oberhansly hearing	.10	45.00
10/17/24	JMC	Correspond with Claire McGuire re Nelson settlement	.10	46.00
10/17/24	CMM	Attorney conference with Robert Wing re upcoming hearing; Draft outline and summarize research re the same; Communicate with recently sued claw back defendant	2.90	855.50
10/18/24	JMC	Correspond with Jeff Balls re Lugli case; Correspond with court clerk re Oberhansly hearing	.40	184.00

PARR BROWN GEE & LOVELESS

Invoice: 957861
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

February 10, 2025
 Client: 176430
 Matter: 2

Date	Tkpr	Description	Hours	Amount
10/18/24	CMM	Prepare for hearing in Oberhansly matter; Attorney conference with Robert Wing re the same; Communicate with Court and opposing counsel re reschedule of hearing; Research and draft settlement agreement for Aults; Communicate with Aults re the same	7.30	2,153.50
10/19/24	JAB	Correspond with Matthew Barneck	.10	39.50
10/21/24	RMB	Communicate with Dan Dearden re post-settlement issues	.20	87.00
10/22/24	JAB	Revise quarterly report; Review court pleadings; Conference with Rodger Burge re claw back matters; Correspond with Jason Hull; Correspond with Jonathan Hafen re settlement; Draft settlement agreement	4.10	1,619.50
10/22/24	CMM	Draft and revise settlement agreement and confession of judgement	3.30	973.50
10/23/24	JAB	Draft settlement agreement; Draft confession of judgment; Review court order; Correspond with Jonathan Hafen; Correspond with Robert Cummings	2.20	869.00
10/24/24	JAB	Correspond with Erik Olsen; Review website messages; Correspond with Jonathan Hafen re settlements; Conference with Rodger Burge; Draft motion to appoint personal representative	4.00	1,580.00
10/24/24	CMM	Review default and draft settlement agreement related to the same; Communicate with experts re delay in scheduling; Review documents produced as initial disclosures	5.50	1,622.50
10/25/24	JMC	Correspond with Robert Wing re Oberhansly hearing and legal strategy; Review and revise settlement agreement with Nelson	1.00	460.00
10/25/24	JAB	Correspond with Amanda Bradley; Conference with Robert Wing; Revise motion for appointment of personal representative	3.60	1,422.00
10/25/24	AWF	Research re application of CTA to receiverships	1.60	568.00
10/25/24	CMM	Review new counter claim filed by Guyon; Research and draft discovery requests for the same; Communicate with Robert Wing re hearing of motion to compel and next steps; Research and draft attorney fee motion; Review order entered by the Court re to the same	8.30	2,448.50
10/25/24	RGW	Prepare for and attend hearing; Call with Jonathan Hafen re same	.60	270.00
10/25/24	AB	Review and revise probate documents drafted by Jeffery Balls; Conference with Stephen Sargent and Jeffery Balls re same	.70	150.50
10/26/24	JAB	Correspond with Robert Cummings re settlement	.10	39.50
10/28/24	JMC	Review and revise quarterly report; Correspond with Jon Hafen and Jeff Balls re the same	2.00	920.00
10/28/24	JAB	Revise application for personal representative; Draft settlement agreement; Correspond with Robert Cummings; Correspond with Erik Olsen	3.90	1,540.50
10/29/24	JAB	Correspond with Shaun Peck; Correspond with Ryan Pahnke	.20	79.00
10/30/24	JAB	Conference with Joseph Covey; Revise settlement agreement; Correspond with Robert Cummings re same	1.00	395.00
10/31/24	JMC	Correspond with Michael Thompson re Nelson lawsuit and related issue; Correspond with Jon Hafen re distribution	1.80	828.00

PARR BROWN GEE & LOVELESS

Invoice: 957861
 Rust Rare Coin Receivership
 Asset Analysis & Recovery

February 10, 2025
 Client: 176430
 Matter: 2

Date	Tkpr	Description	Hours	Amount
10/31/24	JAB	Review correspondence; Review emails from investors; Telephone conference with Robert Cummings; Review settlements; Correspond with Michael Gehret; Review bank transactions	2.90	1,145.50
11/01/24	JAB	Correspond with Jonathan Hafen re FinCEN and settlement; Correspond with Robert Cummings; Telephone conference with Jeff Shaw	.50	197.50
11/01/24	CMM	Communicate with experts re extension of time for expert discovery per granted motion to compel in Oberhansly matter; Research motion to compel attorney fees issue	4.30	1,268.50
11/04/24	JAB	Draft waivers of summons; Correspond with Ryan Pahnke; Correspond with Erik Olson; Review status of claw back matters; Telephone conference with Michael Gehret; Correspond with Jeff Shaw; Conference with Jonathan Hafen, Claire McGuire, and Joseph Covey	2.50	987.50
11/04/24	CMM	Communicate with Jeffery Balls re settlements and upcoming litigation deadlines for various claw back actions; Communicate with Thomas Melton re Guyon litigation; Communicate with opposing counsel re the same; Discussion with Receiver, Joseph Covey, and Jeffery Balls re possibility and mechanics of another distribution to victims	2.90	855.50
11/05/24	RMB	Review Lugli claim file in preparation for strategic settlement meeting with Receiver (.3)	.30	130.50
11/05/24	JAB	Correspond with Tonya Wright re initial disclosures; Correspond with Jeff Shaw	.20	79.00
11/05/24	CMM	Communicate with Parr team re amended counterclaims from Guyon; Draft motion and order for extension; Communicate with opposing counsel re the same; Coordinate filing of the same; Review filings and research issue of attorney liens; Draft consent of judgement	3.80	1,121.00
11/06/24	JMC	Review filings in various clawback actions	.10	46.00
11/06/24	RMB	Review Lugli claim file documents in connection with preparation for strategy meeting with Jon Hafen and Jeff Shaw; Conference with Jon Hafen and Jeff Shaw re Lugli investor group analysis and strategy	3.80	1,653.00
11/06/24	JAB	Review notice from court re appointment of personal representative; Call court clerk re same; Correspond with Ryan Pahnke; Conference with Jeff Shaw, Jonathan Hafen, and Rodger Burge	2.20	869.00
11/07/24	RMB	Review Lugli investor group documentation for unallocated transactions and ownership of entities;	1.30	565.50
11/07/24	JAB	Telephone conference with court clerk re notice of personal representative; Review affidavit of Jeff Shaw re summary judgment motion; Correspond with Jeff Shaw re same; Revise motion for summary judgment; Review information re Lugli payments; Correspond with Judson Pitts	1.60	632.00
11/07/24	CMM	Communicate with opposing counsel re settlement; Review settlement agreement and opposing counsel redlines for the same; Research motion to compel fees	4.80	1,416.00
11/08/24	JAB	Email Erik Olsen re waiver of service; Finalize motion for summary judgment	1.10	434.50

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 Asset Analysis & Recovery

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Date	Tkpr	Description	Hours	Amount
11/08/24	CMM	Review settlement payments; Communicate with claw back defendant re settlement agreement; Draft settlement agreement; Research settlement agreement numbers	3.90	1,150.50
11/11/24	JAB	Draft discovery requests; Email party and opposing counsel re same; Email Robert Cummings re motion to approve settlement; Review claw back actions; Email Ryan Pahnke re settlement; Correspond with James Samuelson re bankruptcy; Draft initial disclosures	4.30	1,698.50
11/12/24	JMC	Correspond with Jeff Balls re Arizona bankruptcy matter and review other ancillary proceedings	.20	92.00
11/12/24	JAB	Conference with Abbey Farnsworth; Correspond with Jonathan Hafen; Correspond with Leif Larsen; Review documents for production	1.80	711.00
11/13/24	JAB	Review settlement agreement; Correspond with Claire McGuire re same; Review FinCEN BOI report; Correspond with Judson Pitts re settlement; Review discovery responses from defendant; Review stipulation to substitute party; Revise discovery requests	3.40	1,343.00
11/13/24	CMM	Research and draft Settlement Agreement in Flint Farms Trust claw back action; Review expert reports re the same; Communicate with Jeffery Balls re the same; Revise per feedback; Communicate with claw back defendant re settlement; Research motion to compel attorneys fees issue; Draft new scheduling order	5.10	1,504.50
11/14/24	JAB	Telephone conference with Jeff Shaw; Review documents for initial disclosures; Review correspondence re settlement; Review motion to substitute party; Correspond with Dan Nies; Correspond with Erik Olson; Draft motion	3.80	1,501.00
11/14/24	CMM	Review new documents produced in Oberhansly matter and compare with former productions; Draft motion for fees; Communicate with experts re the same; Communicate with Flint re execution of settlement agreement	3.90	1,150.50
11/15/24	MJB	(Hafen v. Howell) Review appellate decision (0.4); Conference with Jeff Balls (0.1)	.50	212.50
11/15/24	JAB	Review appellate ruling; Correspond with Jonathan Hafen re settlement; Revise discovery requests; Correspond with Dan Nies re same	2.20	869.00
11/15/24	TMM	Prepare response to amended counterclaim	1.00	450.00
11/15/24	LH	Download BRG Tilley initial disclosures and upload files to share file to send to Premier for processing same for production; Email to Shane at Premier re Tilley hits on iPro in preparation for producing documents with initial disclosures; Email to Jeff Balls re status of collection of documents to be produced; Telephone conference with Shane Bowden with Premier re hits in iPro; Review documents hits in iPro database hits of Tilley (298 hits 1,251 with family) and email Jeff Balls re same	1.50	352.50
11/18/24	JMC	Correspond with Jeff Balls re 10th Circuit ruling and process	.20	92.00
11/18/24	MJB	(Hafen v. Howell) Conference with Jeff Balls (0.2); Review discovery responses (0.4)	.60	255.00

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Date	Tkpr	Description	Hours	Amount
11/18/24	JAB	Review appellate decision; Correspond with Ryan Pahnke; Correspond with Erik Olsen; Correspond with James Samuelson re bankruptcy; Correspond with BRG; Review correspondence; Review court order re settlement; Draft motion to dismiss; Email Robert Cummings re same; Review court order re extension; Coordinate service of complaint; Correspond with Tom Melton	5.30	2,093.50
11/18/24	TMM	Emails re filing of Response to Amended Counterclaim	.30	135.00
11/19/24	JMC	Review 10th Circuit opinion in Howell; Correspond with Jeff Balls and local Arizona bankruptcy counsel re the same	1.60	736.00
11/19/24	JAB	Conference with Robert Wing; Coordinate service of process; Correspond with Tom Melton; Review documents for initial disclosures; Telephone conference with James Samuelson and Joseph Covey; Correspond with Steve Waterman; Telephone conference with Steve Waterman	4.50	1,777.50
11/19/24	CMM	Meet with Robert Wing re Oberhansly case and documents; Communicate with experts and Jeffery Balls re need to meet about the same	.70	206.50
11/19/24	CMM	Research Oberhansly matter for documents and potential summary judgement issues; Draft motion for fees; Communicate with claw back defendants re reps and warranties in settlement agreement and effect of a confessions of judgment	5.60	1,652.00
11/19/24	LH	Follow up with Jeff Balls re Tilley production	.10	23.50
11/20/24	JAB	Correspond with Jeff Shaw; Correspond with Erik Olsen; Review discovery requests	1.90	750.50
11/20/24	LH	Communicate with Jeff Balls and Premier Legal Technologies re Tilley initial disclosures documents to be produced; Document management re same	.50	117.50
11/21/24	JMC	Review motion for default filed by Peter Guyon; Correspond with Jeff Balls re the same	.40	184.00
11/21/24	JAB	Coordinate production of initial disclosures	1.30	513.50
11/21/24	LH	Document management re Tilley initial disclosures document production volume RRC_TILLEYPROD001 (bates range RRC_TILLEY000001 - RRC_TILLEY002660); Email Jeff Balls re written discovery and document production; Finalize plaintiff's Rule 26(a) initial disclosures document and serve production and written discovery on opposing counsel	1.00	235.00
11/22/24	JMC	Review deadlines in Guyon clawback action	.30	138.00
11/22/24	JAB	Correspond with Lori Henry re productions; Video conference with Jeff Shaw; Correspond with James Samuelson re bankruptcy; Telephone conference with court clerk	2.00	790.00
11/22/24	CMM	Prepare for and attend meeting with Robert Wing, Jeffery Balls, and Jeff Shaw re new documents, expert report, and litigation strategy; Draft requested documents	1.40	413.00
11/22/24	RGW	Prepare for and participate in call with Claire McGuire and Jeff Shaw	.60	270.00

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Date	Tkpr	Description	Hours	Amount
11/22/24	LH	Read and respond to email from Jeff Balls re Hafen and RRC document productions; Upload HAFENPROD and RRCPROD documents to share file and serve on opposing counsel re Receiver's initial disclosures in Tilley case	1.50	352.50
11/25/24	JMC	Review court's ruling on Guymon motion; Review dates for other clawback actions	.30	138.00
11/25/24	RMB	Review Lugli claim file documents for transactions requiring additional detail to properly allocate to payor or payee investors	.50	217.50
11/25/24	JAB	Review correspondence from Erik Olson; Correspond with Jenny Weilacher; Draft motion to substitute party; Telephone conference with court clerk; Telephone conference with Tom Melton	.90	355.50
11/25/24	CMM	Review filings in claw back action; Attorney conference with Jeffery Balls re the same; Coordinate execution of settlement agreement	3.80	1,121.00
11/25/24	TMM	Review amended complaint; Prepare revisions	.50	225.00
11/26/24	JAB	Review pleadings; Correspond with Erik Olsen; Review initial disclosures; Draft motion for extension of time to serve complaints; Review correspondence re settlements	1.30	513.50
11/26/24	LH	Review upload of Hafen general production documents and communicate with Jeff Balls and Crista Yancey re same; Download Tilley initial disclosures and document production and send link to Jeff Balls	.80	188.00
11/27/24	JMC	Review various clawback filing deadlines	.10	46.00
11/27/24	JAB	Review analysis of BRG for clawback defendant	.50	197.50
11/27/24	WOP	Calls with Gary Laramie re unsold items; Analyze bills of sale from previous purchases of coins	3.70	1,165.50
11/27/24	CY	Download initial disclosure docs for Keith Tilley case	2.00	400.00
11/29/24	CY	Email outside counsel initial disclosures (Tilley)	.10	20.00
12/02/24	JAB	Review documents; Review appellate briefs; Review correspondence re claims; Correspond with Steve Waterman	2.60	1,027.00
12/02/24	CMM	Review settlement agreement and communicate with claimant re execution and payment of the same; Communicate with Parr Brown team re dismissal and remaining matters; Draft settlement and track payment; Manage documents for initial disclosures	6.90	2,035.50
12/03/24	RMB	Review and analyze Lugli investor group documents in connection with evaluating claims and preparation for settlement conference (2.4)	2.40	1,044.00
12/03/24	JAB	Review motion for leave to file 2nd amended complaint; Telephone conference with James Jenkins; Review proofs of service; Telephone conference with Jeff Shaw; Review affidavit of nonservice; Review correspondence	2.80	1,106.00

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Date	Tkpr	Description	Hours	Amount
12/03/24	CMM	Research attorneys fee issue related to motion to compel; Review filings and order entered by the Court re the same; Communicate with Robert Wing re meet and confer communications with opposing counsel; Communicate with defendant re receipt of check and next steps from settlement agreement; Communicate with experts and Robert Wing re report for Oberhansly matter; Review new filings in Nelson adversary proceeding and communicate with Parr Brown team re the same	8.40	2,478.00
12/04/24	RMB	Review and analyze transactional documents for various disbursements and receipts from Lugli group investors; analyze potential claims in connection with said transactions; Prepare email to Erik Olson re Lugli group meeting and request for additional information for various transactions	5.50	2,392.50
12/04/24	CMM	Draft confession of judgement for Ault Settlement; Draft confession of judgement section of settlement agreement; Analyze and provide feedback on settlement agreement redlines from opposing counsel in the Nelson Adversary Proceeding; Review communications from Nelson and opposing counsel; Communicate with experts re form of submission for Oberhansly report and need for meeting re the same; Communicate with Joseph Covey re settlement redlines	6.90	2,035.50
12/05/24	JAB	Draft motion for alternative service	.10	39.50
12/05/24	CMM	Research and draft confession of judgement for settlement agreement; Research and draft settlement agreement; Communicate with experts and Parr Brown team re the same; Communicate with Joseph Covey and clerk of court re adversary proceeding and finalizing settlement agreement; Communicate with opposing counsel re the same	8.30	2,448.50
12/05/24	CY	Download production and send to outside counsel	.90	180.00
12/06/24	JMC	Correspond with Jim Samuelson and Jeff Balls re Howell proposal; Review clawback filings	.60	276.00
12/06/24	JAB	Conference with BRG re declaration; Draft motion for alternative service; Correspond with Kristin Baughman; Correspond with Jonathan Hafen re settlement offer; Correspond with James Samuelson; Correspond with BRG	3.00	1,185.00
12/06/24	CMM	Communicate with Kathy Bates and Parr Brown team re settlement payments; Research original expert determinations for settlement agreement; Communicate with Parr Brown team re settlement of adversary proceeding and updates for the court re the same	6.20	1,829.00
12/06/24	RGW	Call with Jeff Shaw, Jeff Balls, Claire McGuire and Ray Strong re reports and motions and late acquired documents; Emails with Claire McGuire re motion	.80	360.00
12/09/24	JMC	Correspond with Jeff Balls re Howell matter and appeal; Correspond with Claire McGuire re Darren Nelson case	.40	184.00
12/09/24	JAB	Review returns of service; Correspond with Ryan Pahnke; Conference with Joseph Covey	1.00	395.00

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12/09/24	CMM	Communicate internally re redlines of settlement agreement; Communicate with opposing counsel re the same	1.20	354.00
12/09/24	TMM	Review filed summonses; Check on status; Compare against outstanding list	1.50	675.00
12/10/24	CMM	Draft redlines for settlement agreement; Communicate related to the same with opposing counsel; Research and draft meet and confer letter related to attorney fee issue; Attorney conference with Robert Wing re the same; Communicate with opposing counsel re the same	4.80	1,416.00
12/11/24	JMC	Correspond with Jeremy Sink re Nelson matter; Correspond with Jim Samuelson re legal strategy in Howell litigation	1.30	598.00
12/11/24	JAB	Telephone conference with Joseph Covey and James Samuelson	.90	355.50
12/11/24	CMM	Review filing related to additional claims and communicate with opposing counsel in claw back action re the same; Draft response to additional claims	3.30	973.50
12/12/24	JAB	Correspond with claw back defendants	.10	39.50
12/12/24	CMM	Communicate with accounting re settlement payment; Draft motion to dismiss related to the same	2.60	767.00
12/13/24	CMM	Communicate with experts re additional documents and need for extension; Draft extension documents and communicate with opposing counsel re the same	2.60	767.00
12/16/24	JAB	Review proof of service; Correspond with Tom Melton; Correspond with James Jenkins; Correspond with Kristin Baughman	.30	118.50
12/16/24	CMM	Communicate with Thomas Melton re to Guyon clawback and needed extensions; Communicate with opposing counsel re the same; Draft extensions and proposed order; Research attorney lien issue for the same	6.10	1,799.50
12/17/24	JMC	Correspond with Jeff Balls re clawback actions and distribution	.20	92.00
12/17/24	CMM	Review additional proposed redlines for Nelson Settlement from opposing counsel; Communicate with Parr Brown team re the same; Research bankruptcy adversary proceeding issue	6.60	1,947.00
12/17/24	CY	Research Westlaw for addresses for T. Gray, K. Karkra, C. Sargent, N. Williams, L. Chard, M. Chard, M. Chard, N. Chard, T. Chard, C. Fillerup, E. Fillerup and B. Baker; Email correspondence with ICU Services re 2nd attempt to serve addresses; Email correspondence with Thomas Melton, Jeff Balls and staff re same	3.80	760.00
12/18/24	JMC	Correspond with Jeff Balls re Howell hearing and related issues	.40	184.00
12/18/24	JAB	Correspond with Jonathan Hafen and Joseph Covey; Review court order; Telephone conference with claw back defendant; Correspond with same; Review motion to dismiss	.70	276.50
12/18/24	CMM	Review expert report and research party contributions for settlement agreement; Communicate with defendant re motion to dismiss; Draft motion to dismiss; Draft extension motion and order and communicate the same to opposing counsel	8.90	2,625.50

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Date	Tkpr	Description	Hours	Amount
12/18/24	LH	Telephone conference with E. Etzel re future payments; Make notes re email address and dates they will be in Sweden; Email Jeff Balls re future payments to provide to Etzels	.20	47.00
12/19/24	JMC	Correspond with Claire McGuire re Nelson settlement agreement	.20	92.00
12/19/24	JAB	Correspond with Jack Nunn re opposition to motion to dismiss	.10	39.50
12/19/24	CMM	Communicate with opposing counsel re extension; Draft the same; Communicate with Joseph Covey and opposing counsel re redlines and execution of settlement agreement; Communicate with Robert Wing re changes to filing and potential for motion to compel; Communicate with Thomas Melton and Jeff Shaw re expert report for Guyon matter	3.60	1,062.00
12/19/24	CY	Research Westlaw for new address for the Fillerups; Email correspondence with Thomas Melton and Jeff Balls re Fillerup's avoiding service and next steps; Email correspondence to ICU re serving N. Williams; Email correspondence with staff re serving summons and complaint	1.90	380.00
12/19/24	TMM	Emails re expert discovery extension from BRG	.20	90.00
12/19/24	LH	Read and respond to Jeff Balls email re distribution next Monday; Call to Etzels re same; Email to Etzels re distribution; Communicate with Jeff Balls re distribution master list; Review distribution list and check mailing address for the Etzels	.20	47.00
12/20/24	JMC	Review settlement offer from J. Peterson; Correspond with Nelson's counsel re settlement	.30	138.00
12/20/24	RMB	Review and analyze Lugli investor group transactional documents and communicate with Jeff Shaw re same	1.50	652.50
12/20/24	CMM	Review expert analysis for Guyon; Communicate with Jeff Shaw re expert report for the same; Review new filings from Trustee in adversary proceeding	3.60	1,062.00
12/26/24	RMB	Review additional incoming documents from Lugli investor group legal counsel and communicate with Jeff Shaw re same (1.3)	1.30	565.50
12/26/24	MJB	Correspond with Jeff Balls and Joe Covey (0.1)	.10	42.50
12/27/24	JMC	Review recent clawback filings	.10	46.00
12/27/24	JAB	Telephone conference with court clerk; Telephone conference with claw back defendants; Conference with Tom Melton	.70	276.50
12/27/24	TMM	Draft motions, declarations, and order for extension of time and alternative service for Sargent and Fields groups	4.30	1,935.00
12/29/24	RMB	Review and analyze additional incoming Lugli investor group documents and prepare analysis for Jeff Shaw and other Rust team members	1.20	522.00
12/29/24	JWN	Review defendants AG Tsumani LLC, et al.'s motion to reconsider and to dismiss for insufficient service of process, ex parte motion for extension of time to serve complaint; order granting ex parte motion for extension of time to serve complaint, and rules 4 and 6 of the Federal Rules of Civil Procedure; Analyze how to respond to defendants AG Tsumani LLC, et al.'s motion	.50	127.50

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Date	Tkpr	Description	Hours	Amount
12/30/24	JMC	Review pleadings and dockets; Review correspondence re Nelson matter; Correspond with Claire McGuire and Jon Hafen re settlements and disputes	2.00	920.00
12/30/24	JAB	Telephone conference with Steven Waterman	.30	118.50
12/30/24	CMM	Communicate with opposing counsel for Oberhansly re extension and need to meet and confer; Revise stipulated motion; Arrange filing of the same; Communicate with Guyon re stipulated extension	1.30	383.50
12/30/24	JWN	Research issues relating to quashing service of process, standards used by courts in evaluating whether to extend time limits under rule 4(m), standards used by courts in evaluating whether to extend time limits under rule 6(b), standards used by courts in considering motions to dismiss under rule 12(b)(5), rules concerning ex parte communications relating to extension of time limits to serve a complaint, whether a time extension to serve a complaint under rule 4(m) may be granted after the complaint is already served, and the "good cause" standard under rule 4(m); Review relevant cases, rules, and secondary authority re same; Review other case documents including the tolling agreement and draft settlement agreement; Analyze possible counterarguments to defendants AG Tsumani LLC, et al.'s arguments for the purposes of drafting a memorandum opposing the motion to reconsider and to dismiss for insufficient service of process	4.60	1,173.00
12/31/24	JMC	Review correspondence from Nelson; Correspond with Michael Hoppe re the same; Coordinate endorsement of order; Correspond with Jeremy Sink re the same	1.00	460.00
12/31/24	CMM	Draft motion and affidavit for fees in Oberhansly matter	3.80	1,121.00
12/31/24	JWN	Draft opposition to defendants AG Tsumani LLC, et al.'s motion to reconsider and to dismiss for insufficient service of process; Review relevant motions re same from similar cases for the purposes of evaluating possible counterarguments	.80	204.00
12/31/24	CY	Email correspondence with ICU Investigations re needing affidavit of service for N. Williams and C. Sargent also follow up status on N. Defa, Chard Family, T. Gray, K. Karra, Silver Shoes; Research Westlaw for any updated addresses for clients that haven't been served yet; Email correspondence with Thomas Melton and staff re same and mailing out complaints, summons and order	2.80	560.00
TOTAL PROFESSIONAL SERVICES				\$ 127,892.00

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SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	460.00	18.40	8,464.00
Rodger M Burge	435.00	18.00	7,830.00
Matthew J Ball	425.00	1.20	510.00
Jeffery A Balls	395.00	98.20	38,789.00
Abbey W Farnsworth	355.00	1.60	568.00
Walter O Peterson	315.00	3.70	1,165.50
Claire M McGuire	295.00	196.60	57,997.00
Jack W Nunn	255.00	15.00	3,825.00
Thomas M Melton	450.00	7.80	3,510.00
Robert G Wing	450.00	2.80	1,260.00
Lori Henry - Paralegal	235.00	5.80	1,363.00
Amanda Bradley - Paralegal	215.00	.70	150.50
Crista Yancey - Paralegal	200.00	12.30	2,460.00
TOTALS		382.10	\$ 127,892.00

COSTS ADVANCED

Date	Description	Amount
10/01/24	Tunecore - Yearly Album Renewal	49.99
10/28/24	Salt Lake City District Court - petition application for informal appointment of personal representatives (in the matter of the Estate of M. Wade)	375.00
10/31/24	Pacer Electronic Court Records	4.60
11/12/24	Non ordinary postage	13.00
11/20/24	Duran Legal Services - service of process on A. Kling	98.04
11/21/24	Premier Legal - Tilley production	308.17
11/23/24	Rooster Legal Services - attempted service of process on Robert Townsend Construction	150.00
12/02/24	PACER electronic court records	2.70
12/02/24	TD's Legal Process - rush service of process on AG Tsunami LLC	74.00
12/02/24	TD's Legal Process - rush service of process on N. Defa	95.00
12/02/24	TD's Legal Process - rush service of process on Plethora, LLC	68.00
12/02/24	TD's Legal Process - rush service of process on Silver Shoes, LLC	90.50
12/02/24	ICU Investigations - rush service of process on K. Karkra	202.00
12/03/24	RBA Attorney Services - service of process on J. Vest and S Vest	97.20
12/03/24	Constable Reitz - service of motion for substitution of M. Wade due to death on J. Weilacher	68.00
12/04/24	PACER electronic court records	2.50
12/05/24	PACER electronic court records	2.40
12/05/24	ICU Investigations - rush service of process on C. Sargent	217.25
12/05/24	ICU Investigations - rush service of process on B. Sargent	217.25
12/05/24	ICU Investigations - rush service of process on N. Williams	227.25
12/06/24	TD's Legal Process - rush service of process on N. Hawkes and T. Hawkes	104.50
12/06/24	ICU Investigations - rush service of process on the T. Gray and R. Gray	287.00
12/09/24	PACER electronic court records	1.20
12/09/24	SimpleCertified Mail	15.26

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12/09/24	TD's Legal Process - rush service of process on N. Peterson and J. Peterson	122.50
12/11/24	TD's Legal Process - rush service of process on C. and E. Fillerup	79.00
12/13/24	Constable Reitz - service of motion for substitution of M. Wade due to death on B. Wade	52.00
12/16/24	PACER electronic court records	7.70
12/17/24	Constable Reitz - service of motion for substitution of M. Wade due to death on B. Wade	79.50
12/18/24	TD's Legal Process - rush service of process on Plethora, LLC	47.00
12/18/24	TD's Legal Process - rush service of process on the Chard's	14.50
12/19/24	SimpleCertified Mail	9.82
12/19/24	FedEx - James Samuelson/Sacks Tierney	63.12
12/27/24	PACER electronic court records	2.00
12/30/24	TDs Legal Process - rush service of process on B. Baker	170.00
12/31/24	SimpleCertified Mail	16.98
TOTAL COSTS ADVANCED		\$ 3,434.93
TOTAL THIS INVOICE		\$ 131,326.93



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Rust Rare Coin Receivership

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REMITTANCE ADVICE

RE: Asset Analysis & Recovery

BALANCE DUE THIS INVOICE \$ 131,326.93

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 # 957861

**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





Rust Rare Coin Receivership

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INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Claims Administration

Professional Services	\$ 4,098.50
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 4,098.50



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 Claims Administration

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PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
10/04/24	CMM	Communicate with investor who had purchased claim interest	.20	59.00
10/11/24	JAB	Telephone conference with claimant	.10	39.50
10/31/24	JAB	Telephone conference with claimant; Email claimant	.30	118.50
11/01/24	JAB	Correspond with claimants	.10	39.50
11/05/24	JAB	Analyze potential additional distribution	1.10	434.50
11/07/24	JAB	Telephone conference with claimant; Review claims for second interim distribution	.50	197.50
11/12/24	AWF	Work on matters re CTA filing	.90	319.50
11/13/24	AWF	Prepare and file CTA BOI reports	1.30	461.50
12/03/24	JMC	Correspond with potential claimant M. Chapman re claim and distributions	.30	138.00
12/05/24	JAB	Correspond with Jeff Shaw re distribution; Conference with Joseph Covey; Correspond with Jonathan Hafen re distribution	.40	158.00
12/10/24	JAB	Telephone conference with Jeff Shaw re distribution	.80	316.00
12/12/24	JAB	Correspond with Jeff Shaw; Review transfer of claims;	1.10	434.50
12/13/24	JAB	Telephone conference with Jeff Shaw	.40	158.00
12/16/24	JAB	Review distribution details; Telephone conference with Jeff Shaw; Correspond with J. Bouzos; Draft second distribution letter; Draft notice of second distribution	1.30	513.50
12/18/24	JAB	Review revisions to claim letter; Correspond with J. Bouzos	.90	355.50
12/19/24	JAB	Correspond with Lori Henry	.20	79.00
12/23/24	JAB	Telephone conference with Jeff Shaw	.60	237.00
12/27/24	JAB	Review correspondence	.10	39.50

TOTAL PROFESSIONAL SERVICES \$ 4,098.50

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Joseph M R Covey	460.00	.30	138.00
Jeffery A Balls	395.00	7.90	3,120.50
Abbey W Farnsworth	355.00	2.20	781.00
Claire M McGuire	295.00	.20	59.00
TOTALS		10.60	\$ 4,098.50

TOTAL THIS INVOICE \$ 4,098.50



February 10, 2025

Rust Rare Coin Receivership

Invoice: 957862
Client: 176430
Matter: 5

REMITTANCE ADVICE

RE: Claims Administration

BALANCE DUE THIS INVOICE \$ 4,098.50

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 # 957862

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-FIFTH INTERIM FEE APPLICATION

Time Records of BRG

EXHIBIT C



INVOICE

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

January 28, 2025
Client-Project: 016222-025457
Invoice #: 10012730
Tax ID: 27-1451273

Via Email: jhafen@parrbrown.com

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

Services Rendered From October 1, 2024 Through December 31, 2024

Professional Services	\$	93,361.00	USD
Voluntary Reduction		(825.00)	USD
CURRENT CHARGES	\$	92,536.00	USD

PAYMENT IS DUE BY February 27, 2025

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: 10012730

Please remit check payment to:

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

Please remit express/overnight payment to:

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

Please send remittance advice details to:

remittanceadvice@thinkbrg.com



INVOICE

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

Page 2 of 10
Invoice # 10012730
Client-Project: 016222-025457

Services Rendered From October 1, 2024 Through December 31, 2024

PROFESSIONAL SERVICES

	<u>Rate</u>	<u>Hours</u>	<u>Amount</u>
Managing Director			
Ray Strong	415.00	3.40	1,411.00
Associate Director			
Leif Larsen	375.00	8.70	3,262.50
Jeffrey Shaw	375.00	234.30	87,862.50
Jeffrey Shaw	0.00	2.20	N/C
Total Professional Services		248.60	92,536.00



INVOICE

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

Page 3 of 10
Invoice # 10012730
Client-Project: 016222-025457

SUMMARY BY TASK CODE

<u>Task Code</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
300	Claims Process / Distribution	24.00	9,028.00
500	Recovery Litigation	211.80	79,533.00
600	Tax Compliance & Analysis	10.60	3,975.00
950	Fee Application Preparation & Hearing	2.20	0.00
Total Professional Services		248.60	92,536.00



INVOICE

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

Page 4 of 10
 Invoice # 10012730
 Client-Project: 016222-025457

Services Rendered From October 1, 2024 Through December 31, 2024

DETAIL OF PROFESSIONAL SERVICES

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 300 - Claims Process / Distribution					
10/21/24	Jeffrey Shaw	Follow-up regarding status of distribution checks.	0.20	375.00	75.00
10/22/24	Jeffrey Shaw	Reviewed status of distribution checks and updated schedule.	0.70	375.00	262.50
12/05/24	Jeffrey Shaw	Reviewed and updated distribution model in accordance with request from counsel and email regarding the same.	2.10	375.00	787.50
12/06/24	Jeffrey Shaw	Analyzed and prepared updated distribution model.	2.90	375.00	1,087.50
12/06/24	Jeffrey Shaw	Follow-up regarding distribution issues.	0.30	375.00	112.50
12/06/24	Jeffrey Shaw	Review and discussion regarding wage claim distributions.	0.80	375.00	300.00
12/06/24	Jeffrey Shaw	Prepared distribution list in preparation for Receiver's 2nd distribution.	1.20	375.00	450.00
12/09/24	Jeffrey Shaw	Reviewed and updated distribution model.	3.10	375.00	1,162.50
12/09/24	Jeffrey Shaw	Reviewed and prepared distribution list.	2.10	375.00	787.50
12/10/24	Jeffrey Shaw	Reviewed and updated distribution model.	1.30	375.00	487.50
12/10/24	Jeffrey Shaw	Discussion with counsel regarding distribution.	0.40	375.00	150.00
12/12/24	Jeffrey Shaw	Discussion regarding distribution model.	0.30	375.00	112.50
12/12/24	Jeffrey Shaw	Follow-up with counsel regarding distribution.	0.20	375.00	75.00
12/12/24	Jeffrey Shaw	Reviewed and updated distribution model and emails regarding the same.	0.70	375.00	262.50
12/12/24	Ray Strong	Attended call with BRG team regarding 2nd Distribution calculations.	0.30	415.00	124.50
12/12/24	Ray Strong	Analyzed 2nd Distribution calculations before sending to counsel.	0.40	415.00	166.00
12/13/24	Jeffrey Shaw	Reviewed, finalized and submitted distribution schedules to counsel.	2.00	375.00	750.00
12/13/24	Jeffrey Shaw	Call with counsel to discuss distribution issues.	0.20	375.00	75.00



INVOICE

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

Page 5 of 10
 Invoice # 10012730
 Client-Project: 016222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 300 - Claims Process / Distribution					
12/18/24	Jeffrey Shaw	Reviewed and provided suggested revisions to 2nd distribution letter and Notice of Distribution.	1.80	375.00	675.00
12/23/24	Jeffrey Shaw	Reviewed distribution and discussion and emails regarding the same.	2.80	375.00	1,050.00
12/23/24	Jeffrey Shaw	Call with counsel to discuss distribution.	0.20	375.00	75.00
Total for Task Code 300			24.00		9,028.00
Task Code: 500 - Recovery Litigation					
10/01/24	Jeffrey Shaw	Emails regarding litigation issues.	0.30	375.00	112.50
10/01/24	Jeffrey Shaw	Analyzed Oberhansly claim and support.	1.50	375.00	562.50
10/01/24	Jeffrey Shaw	Analyzed investment activity and support and prepared declaration narrative.	5.70	375.00	2,137.50
10/02/24	Jeffrey Shaw	Analyzed investment activity and support and prepared declaration narrative.	6.90	375.00	2,587.50
10/03/24	Jeffrey Shaw	Analyzed investment activity and support and prepared declaration narrative.	7.70	375.00	2,887.50
10/04/24	Jeffrey Shaw	Analyzed investment activity and prepared declaration narrative.	3.50	375.00	1,312.50
10/04/24	Jeffrey Shaw	Discussion with counsel regarding litigation issues.	0.60	375.00	225.00
10/07/24	Jeffrey Shaw	Analyzed investment activity and prepared declaration narrative.	4.50	375.00	1,687.50
10/07/24	Jeffrey Shaw	Prepared declaration schedules.	1.30	375.00	487.50
10/16/24	Jeffrey Shaw	Discussion with counsel regarding litigation issues.	0.30	375.00	112.50
10/21/24	Jeffrey Shaw	Reviewed activity and prepared declaration schedules.	5.30	375.00	1,987.50
10/21/24	Jeffrey Shaw	Follow-up regarding litigation issues.	0.20	375.00	75.00
10/22/24	Jeffrey Shaw	Reviewed transaction activity and support and prepared declaration schedules.	4.60	375.00	1,725.00
10/22/24	Jeffrey Shaw	Prepared and updated declaration narrative.	1.50	375.00	562.50
10/23/24	Jeffrey Shaw	Prepared and updated declaration narrative.	3.50	375.00	1,312.50
10/23/24	Jeffrey Shaw	Reviewed transaction activity and support and prepared declaration schedules.	3.60	375.00	1,350.00



INVOICE

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

Page 6 of 10
 Invoice # 10012730
 Client-Project: 016222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 500 - Recovery Litigation					
10/24/24	Jeffrey Shaw	Reviewed and updated declaration narrative.	2.80	375.00	1,050.00
10/24/24	Jeffrey Shaw	Reviewed transaction detail and support for Oberhansly.	3.70	375.00	1,387.50
10/24/24	Jeffrey Shaw	Reviewed Oberhansly filed proof of claim.	0.50	375.00	187.50
10/25/24	Jeffrey Shaw	Reviewed and updated declaration narrative.	1.10	375.00	412.50
10/25/24	Jeffrey Shaw	Reviewed and prepared declaration exhibits.	3.90	375.00	1,462.50
10/28/24	Jeffrey Shaw	Reviewed transaction data and support and prepared declaration exhibits.	6.10	375.00	2,287.50
10/28/24	Jeffrey Shaw	Follow-up regarding litigation issues.	0.20	375.00	75.00
10/29/24	Jeffrey Shaw	Follow-up regarding litigation issues.	0.20	375.00	75.00
10/29/24	Jeffrey Shaw	Reviewed transaction data and support and prepared declaration exhibits.	6.90	375.00	2,587.50
10/30/24	Jeffrey Shaw	Reviewed and prepared declaration exhibits.	5.90	375.00	2,212.50
10/30/24	Jeffrey Shaw	Reviewed and updated declaration narrative.	1.30	375.00	487.50
10/30/24	Jeffrey Shaw	Follow-up regarding litigation issues.	0.50	375.00	187.50
10/31/24	Jeffrey Shaw	Reviewed and prepared declaration exhibits.	4.90	375.00	1,837.50
10/31/24	Jeffrey Shaw	Reviewed and updated declaration narrative.	0.80	375.00	300.00
11/01/24	Jeffrey Shaw	Reviewed transaction activity and support and prepared declaration exhibits.	5.90	375.00	2,212.50
11/01/24	Jeffrey Shaw	Call with counsel regarding litigation and tax issues.	0.20	375.00	75.00
11/04/24	Jeffrey Shaw	Reviewed transaction data and support and prepared declaration narrative and exhibits.	2.40	375.00	900.00
11/05/24	Jeffrey Shaw	Reviewed and prepared declaration narrative.	1.50	375.00	562.50
11/05/24	Jeffrey Shaw	Reviewed transaction data and support and prepared declaration exhibits.	3.70	375.00	1,387.50
11/05/24	Jeffrey Shaw	Reviewed and updated summary judgment motion.	0.80	375.00	300.00
11/06/24	Jeffrey Shaw	Reviewed Lugli activity and transaction detail and support.	4.40	375.00	1,650.00



INVOICE

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

Page 7 of 10
 Invoice # 10012730
 Client-Project: 016222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 500 - Recovery Litigation					
11/06/24	Jeffrey Shaw	Prepared for and attended meeting with Receiver and counsel regarding Lugli group activity.	2.50	375.00	937.50
11/06/24	Jeffrey Shaw	Reviewed Lugli transaction activity and prepared schedule per counsel request.	1.00	375.00	375.00
11/07/24	Jeffrey Shaw	Reviewed, updated and prepared declaration exhibits and narrative.	4.50	375.00	1,687.50
11/07/24	Jeffrey Shaw	Reviewed Lugli activity and support.	1.10	375.00	412.50
11/07/24	Jeffrey Shaw	Reviewed Keith Tilley activity and support per counsel request.	0.90	375.00	337.50
11/08/24	Jeffrey Shaw	Reviewed and reconciled Lugli activity.	4.30	375.00	1,612.50
11/08/24	Jeffrey Shaw	Reviewed, finalized and submitted Walker declaration and exhibits.	3.10	375.00	1,162.50
11/08/24	Ray Strong	Reviewed Shaw declaration for Walker litigation.	0.20	415.00	83.00
11/11/24	Jeffrey Shaw	Reviewed and updated Lugli schedules.	3.50	375.00	1,312.50
11/11/24	Jeffrey Shaw	Analyzed Keith Tilley activity and support.	2.90	375.00	1,087.50
11/12/24	Jeffrey Shaw	Follow-up regarding litigation issues.	0.20	375.00	75.00
11/12/24	Jeffrey Shaw	Analyzed Keith Tilley activity and support and prepared initial disclosure files.	5.40	375.00	2,025.00
11/13/24	Jeffrey Shaw	Reviewed activity and support and prepared initial disclosures for Tilley.	4.40	375.00	1,650.00
11/13/24	Jeffrey Shaw	Follow-up regarding Oberhansly litigation.	0.20	375.00	75.00
11/14/24	Jeffrey Shaw	Prepared and uploaded Tilley initial disclosure documents.	2.30	375.00	862.50
11/15/24	Jeffrey Shaw	Reviewed Oberhansly production.	1.40	375.00	525.00
11/19/24	Jeffrey Shaw	Reviewed Oberhansly production and transaction activity and support.	3.10	375.00	1,162.50
11/19/24	Jeffrey Shaw	Emails regarding Oberhansly litigation.	0.30	375.00	112.50
11/19/24	Jeffrey Shaw	Reviewed 10th Circuit Opinion regarding Howell litigation.	0.80	375.00	300.00



INVOICE

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

Page 8 of 10
 Invoice # 10012730
 Client-Project: 016222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 500 - Recovery Litigation					
11/20/24	Jeffrey Shaw	Reviewed POS data in connection with Oberhansly transactions.	2.70	375.00	1,012.50
11/20/24	Jeffrey Shaw	Follow-up with counsel regarding litigation issues.	0.40	375.00	150.00
11/22/24	Jeffrey Shaw	Prepared for and attended call with counsel regarding Oberhansly litigation.	2.00	375.00	750.00
11/22/24	Jeffrey Shaw	Analyzed and compiled support for Oberhansly declaration.	2.80	375.00	1,050.00
11/25/24	Jeffrey Shaw	Analyzed and compiled support for Oberhansly declaration.	5.50	375.00	2,062.50
11/25/24	Jeffrey Shaw	Reviewed and revised Oberhansly declaration narrative and schedules.	0.80	375.00	300.00
11/26/24	Jeffrey Shaw	Discussion regarding Oberhansly litigation issues.	0.50	375.00	187.50
11/27/24	Jeffrey Shaw	Reviewed transaction activity and support and prepared Oberhansly schedules.	4.10	375.00	1,537.50
12/03/24	Jeffrey Shaw	Discussion regarding Oberhansly litigation.	1.20	375.00	450.00
12/03/24	Jeffrey Shaw	Analyzed and reviewed Tilley disclosure documents.	2.80	375.00	1,050.00
12/03/24	Jeffrey Shaw	Call with counsel regarding Tilley litigation.	0.40	375.00	150.00
12/03/24	Jeffrey Shaw	Coordinated meeting in connection with Oberhansly litigation.	0.30	375.00	112.50
12/03/24	Jeffrey Shaw	Prepared Oberhansly schedules.	1.80	375.00	675.00
12/03/24	Ray Strong	Attended call with BRG (JS) regarding M.Oberhansly litigation.	1.20	415.00	498.00
12/04/24	Jeffrey Shaw	Analyzed Oberhansly activity and support.	2.20	375.00	825.00
12/04/24	Jeffrey Shaw	Prepared declaration schedules.	4.50	375.00	1,687.50
12/05/24	Jeffrey Shaw	Prepared declaration schedules.	3.60	375.00	1,350.00
12/06/24	Jeffrey Shaw	Met with BRG regarding Oberhansly litigation.	0.70	375.00	262.50
12/06/24	Jeffrey Shaw	Met with counsel regarding Oberhansly litigation.	0.60	375.00	225.00
12/06/24	Ray Strong	Attended call with Receiver counsel regarding Oberhansly litigation.	0.60	415.00	249.00



INVOICE

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

Page 9 of 10
 Invoice # 10012730
 Client-Project: 016222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 500 - Recovery Litigation					
12/06/24	Ray Strong	Attended call with BRG regarding Oberhansly litigation.	0.70	415.00	290.50
12/10/24	Jeffrey Shaw	Reviewed investment activity and prepared and updated declaration narrative.	2.10	375.00	787.50
12/10/24	Jeffrey Shaw	Prepared declaration schedules.	1.40	375.00	525.00
12/11/24	Jeffrey Shaw	Prepared and updated declaration narrative.	1.50	375.00	562.50
12/19/24	Jeffrey Shaw	Emails with counsel in connection with litigation issues.	0.40	375.00	150.00
12/20/24	Jeffrey Shaw	Reviewed and responded to emails regarding litigation issues.	0.30	375.00	112.50
12/20/24	Jeffrey Shaw	Follow-up with counsel regarding Lugli group activity.	0.20	375.00	75.00
12/23/24	Jeffrey Shaw	Reviewed Lugli docs and emails.	1.50	375.00	562.50
12/30/24	Jeffrey Shaw	Reviewed Lugli production.	1.00	375.00	375.00
12/30/24	Jeffrey Shaw	Prepared declaration narrative.	5.50	375.00	2,062.50
12/30/24	Jeffrey Shaw	Reviewed and updated declaration exhibits.	1.20	375.00	450.00
12/31/24	Jeffrey Shaw	Prepared and updated declaration narrative.	4.50	375.00	1,687.50
12/31/24	Jeffrey Shaw	Prepared and updated declaration exhibits.	2.00	375.00	750.00
Total for Task Code 500			211.80		79,533.00
Task Code: 600 - Tax Compliance & Analysis					
10/28/24	Leif Larsen	Prepared third quarter 2024 federal payroll tax returns.	1.40	375.00	525.00
10/28/24	Leif Larsen	Prepared third quarter 2024 state payroll tax returns.	1.90	375.00	712.50
10/29/24	Jeffrey Shaw	Emails and discussion regarding payroll tax filings.	0.50	375.00	187.50
10/30/24	Jeffrey Shaw	Follow-up regarding tax filing issues.	0.30	375.00	112.50
10/31/24	Jeffrey Shaw	Coordinated filing of tax form and emails regarding the same.	0.50	375.00	187.50
11/01/24	Jeffrey Shaw	Discussions and email regarding tax issues.	0.60	375.00	225.00
11/12/24	Leif Larsen	Analyzed correspondence received from counsel and prepared response.	0.40	375.00	150.00
12/06/24	Leif Larsen	Prepared fourth quarter 2024 payroll check detail and corresponding reports.	2.60	375.00	975.00



INVOICE

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

Page 10 of 10
 Invoice # 10012730
 Client-Project: 016222-025457

<u>Date</u>	<u>Name</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Task Code: 600 - Tax Compliance & Analysis					
12/23/24	Leif Larsen	Updated 4th quarter payroll checks and employee information and prepared check requests for payment of payroll tax liabilities.	2.40	375.00	900.00
Total for Task Code 600			10.60		3,975.00
Task Code: 950 - Fee Application Preparation & Hearing					
10/17/24	Jeffrey Shaw	[NC] Reviewed time entries and descriptions for Jul-Sep.	0.80	0.00	0.00
10/21/24	Jeffrey Shaw	[NC] Reviewed, finalized and submitted Jul-Sep bill.	0.50	0.00	0.00
11/12/24	Jeffrey Shaw	[NC] Reviewed and prepared fee application narrative.	0.90	0.00	0.00
Total for Task Code 950			2.20		0.00
Professional Services			248.60		92,536.00

EXHIBIT D

EXHIBIT D

TWENTY-FIFTH INTERIM FEE APPLICATION

Time Records of Arizona Counsel

EXHIBIT D

SacksTierney P.A.

ATTORNEYS

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

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

November 06, 2024
 Client: PA123
 Matter: 00008
 Invoice #: 1309917

Page: 1

RE: Gretchen Howell BK - Jonathan Hafen Creditor

For Professional Services Rendered Through October 31, 2024

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
10/02/2024	JSS	Review and email to attorney J. Balls re: status of appeal.	0.20	\$400.00	\$80.00
10/11/2024	JSS	TT attorney J. Balls re: 10th Circuit hearing; under advisement ruling, claim filed by debtor and related issues.	0.50	\$400.00	\$200.00
10/15/2024	JSS	Review docket and judge's procedures page re: status of ruling.	0.20	\$400.00	\$80.00
10/16/2024	JSS	Review docket; calendar follow up.	0.20	\$400.00	\$80.00
Total Professional Services			1.10		\$440.00

SUMMARY

		Hours	Rate	Amount
JSS	James Scott Samuelson	1.10	\$400.00	\$440.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
10/10/2024	James Samuelson- Travel Expenses- Samuelson - 9/04/24 parking - Hearing	\$10.00
Total Disbursements		\$10.00

November 06, 2024
Client: PA123
Matter: 00008
Invoice #: 1309917

SacksTierneyP.A.
ATTORNEYS

Page: 2

Total Services	\$440.00	
Total Disbursements	\$10.00	
Total Current Charges		\$450.00
Previous Balance		\$27,789.00
PAY THIS AMOUNT		\$28,239.00

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

SacksTierney P.A.

ATTORNEYS

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

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

December 02, 2024
 Client: PA123
 Matter: 00008
 Invoice #: 1310703

Page: 1

RE: Gretchen Howell BK - Jonathan Hafen Creditor

For Professional Services Rendered Through November 30, 2024

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
11/01/2024	JSS	Review docket and email to chambers and attorney J. Kahn re: under advisement ruling.	0.40	\$400.00	\$160.00
11/04/2024	JSS	Email from chambers re: under advisement; calendar follow up.	0.20	\$400.00	\$80.00
11/11/2024	JSS	Review and email to attorney J. Balls re: under advisement, appeal and receivable.	0.40	\$400.00	\$160.00
11/18/2024	JSS	Review 10th Circuit decision; summary email to attorney's J. Balls, and J. Covey.	2.00	\$400.00	\$800.00
11/19/2024	JSS	Microsoft Team meeting with attorney's J. Ball and J. Covey re: 10th Circuit decision, plan objection, stipulation to lift stay, notice, next steps, and related matters; phone call and email to attorney J. Kahn re: decision.	1.30	\$400.00	\$520.00
11/20/2024	JSS	Review and follow up call and email to attorney J. Kahn; prepare notes for call.	0.60	\$400.00	\$240.00
11/22/2024	JSS	Call with attorney J. Kahn re: 10th circuit decision, real property, death of debtor Les Howell, stay lift, notice, sale, and related matters; prepare and file notice; Emails with Kahn; emails with attorneys J. Balls and J. Covey.	1.30	\$400.00	\$520.00
11/26/2024	JSS	Email to attorney J. Balls re: email to chambers and response.	0.20	\$400.00	\$80.00
11/27/2024	JSS	Email to attorney J. Kahn re: status, stay lift, sale of property and related matters.	0.30	\$400.00	\$120.00
Total Professional Services			6.70		\$2,680.00

December 02, 2024
Client: PA123
Matter: 00008
Invoice #: 1310703
Page: 2

SacksTierneyP.A.
ATTORNEYS

SUMMARY

		Hours	Rate	Amount
JSS	James Scott Samuelson	6.70	\$400.00	\$2,680.00
	Total Services		\$2,680.00	
	Total Current Charges			\$2,680.00
	Previous Balance			\$28,239.00
	PAY THIS AMOUNT			\$30,919.00

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

SacksTierney P.A.

ATTORNEYS

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

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

January 07, 2025
 Client: PA123
 Matter: 00008
 Invoice #: 1311567

Page: 1

RE: Gretchen Howell BK - Jonathan Hafen Creditor

For Professional Services Rendered Through December 31, 2024

Federal I.D. No.: 86-0493876

SERVICES

Date		Description of Services	Hours	Rate	Amount
12/03/2024	JSS	Review and email to attorney J. Kahn re: appraisal and status; email from Kahn with notice of death, email to attorney J. Balls re: same and stay relief.	0.50	\$400.00	\$200.00
12/06/2024	JSS	Extended call from attorney J. Kahn re: mediation, realtor, listing, appraisal, Utah remand and related items; summary email to attorney J. Balls re: same.	2.20	\$400.00	\$880.00
12/11/2024	JSS	Review and call with attorney's J. Ball and J. Covey re: mediation, motion to dismiss, stay lift and related items.	1.70	\$400.00	\$680.00
12/13/2024	JSS	Review and call to attorney J. Kahn - calendar follow up.	0.30	\$400.00	\$120.00
12/16/2024	JSS	Review and follow up call (left message) and email to attorney J. Kahn.	0.20	\$400.00	\$80.00
12/19/2024	JSS	Review and call with attorney J. Kahn re: proposed global resolution.	1.00	\$400.00	\$400.00
12/23/2024	JSS	Email to attorney's J. Balls and J. Covey re: mediation proposal.	0.50	\$400.00	\$200.00
12/31/2024	JSS	Review docket; notes; next steps including request for status hearing.	0.50	\$400.00	\$200.00
Total Professional Services			6.90		\$2,760.00

January 07, 2025
Client: PA123
Matter: 00008
Invoice #: 1311567

SacksTierneyP.A.
ATTORNEYS

Page: 2

SUMMARY

	Hours	Rate	Amount
JSS James Scott Samuelson	6.90	\$400.00	\$2,760.00
Total Services		\$2,760.00	
Total Current Charges			\$2,760.00
Previous Balance			\$30,919.00
<i>Less Payments</i>			<i>(\$27,789.00)</i>
PAY THIS AMOUNT			\$5,890.00

**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**

EXHIBIT E

EXHIBIT E

TWENTY-FIFTH INTERIM FEE

APPLICATION

Proposed Order

EXHIBIT E

Joseph M.R. Covey (7492) (jcovey@parrbrown.com)
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Attorneys for Jonathan O. Hafen as Receiver

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

COMMODITY FUTURES TRADING
COMMISSION, and

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-FIFTH
INTERIM FEE APPLICATION**

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

Judge Tena Campbell

Magistrate Judge Dustin Pead

Before the Court is the twenty-fifth 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 October 1, 2024, through December 31, 2024 (the “Application Period”), and authorization to pay all allowed fees and expenses from funds of the Receivership Estate.

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

IT IS HEREBY ORDERED that:

1. The Fee Application is GRANTED; and
2. The Receiver is hereby authorized to pay the fees and expenses incurred by the

Receiver, Parr Brown, and BRG, as follows:

- a. Receiver: \$32,256.00 for fees and expenses.
- b. Parr Brown: \$141,645.25 for fees and expenses.
- c. BRG: \$92,536.00 for fees and expenses.
- d. Arizona Counsel: \$5,890.00 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 March 2025.

Honorable Dustin B. Pead
United States Magistrate Judge