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10 Attorneys for Receiver  
Krista L. Freitag

11  
12 UNITED STATES DISTRICT COURT  
13 DISTRICT OF NEVADA  
14

15 FEDERAL TRADE COMMISSION,

16 Plaintiff,

17 vs.

18 SUPERIOR SERVICING LLC, a limited  
liability company; and  
19 DENNISE MERDJANIAN, aka Dennise  
Correa, individually and as managing  
20 member of SUPERIOR SERVICING LLC,

21 Defendants.  
22

Case No. 24-cv-2163-GMN-MDC

**FIRST INTERIM FEE APPLICATION  
OF ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP, GENERAL  
COUNSEL TO THE RECEIVER,  
KRISTA L. FREITAG, FOR PAYMENT  
OF FEES AND REIMBURSEMENT OF  
EXPENSES**

Ctrm: 7D  
Judge: Hon. Gloria M. Navarro

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1 Allen Matkins Leck Gamble Mallory & Natsis LLP (“Allen Matkins”), general  
2 counsel to Krista L. Freitag (the “Receiver”), the Court-appointed receiver for Superior  
3 Servicing, LLC (“Superior”), its subsidiaries, affiliates, successors and assigns, and any  
4 other entity that has conducted any business related to Defendants’ student debt relief  
5 services, including receipt of Assets derived from any activity that is the subject of the  
6 Complaint in this matter, and that the Receiver determines is controlled or owned by any  
7 Defendant, including Accredited, LLC, Sunrise Solutions USA, LLC, Alumni Advantage,  
8 LLC, Student Processing Center Group, LLC, SPCTWO, LLC, Gold West Financial, LLC,  
9 DM Financial, LLC, LJC Music National LLC, South Coast Services, LLC, Business  
10 Done Right Inc., ET&C Holdings, LLC, Capital Servicing, LLC, Cornerstone Doc Prep,  
11 Inc., Amerifed Doc Prep, LLC, Amerifed Servicing, Inc., Scholastic Solutions LLC, and  
12 First Clover Capital, Inc. (collectively the “Receivership Entities” or individually, a  
13 “Receivership Entity”), hereby submits this First Interim Application for Payment of Fees  
14 and Reimbursement of Expenses (the “Application”). This Application covers the period  
15 from the Receiver’s appointment on November 22, 2024 through December 31, 2024 (the  
16 “Application Period”), and seeks approval of \$88,298.85 in fees and \$896.89 in expenses,  
17 and an order authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred  
18 (\$70,639.08) and 100% of the expenses incurred (\$896.89).

## 19 I. INTRODUCTION

20 This equity receivership involves a large student loan debt relief enterprise  
21 associated with the alleged scheme that is the subject of the Complaint filed by the Federal  
22 Trade Commission (the “Commission”). The Receiver was appointed on a temporary  
23 basis by the Ex Parte Temporary Restraining Order with Asset Freeze, Appointment of a  
24 Temporary Receiver, and Other Equitable Relief, and Order to Show Cause Why  
25 Preliminary Injunction Should Not Issue entered on November 22, 2024 (“TRO”) (Dkt. 9),  
26 and on a permanent basis on December 6, 2024, pursuant to the Order Granting  
27 Preliminary Injunction as to Defendant Superior Servicing LLC (Dkt. 30) and subsequent  
28

1 Preliminary Injunction Order as to Defendant Dennise Merdjanian entered on  
2 December 19, 2024 (Dkt. 42) (the “Appointment Orders”).

3 The Appointment Orders confer broad duties, responsibilities, and powers upon the  
4 Receiver, which are designed to allow her to secure, preserve, and protect the assets of the  
5 Receivership Entities, investigate the Receivership Entities’ financial transactions, and  
6 investigate and recover sums transferred to third parties. The Receiver promptly  
7 determined that experienced and qualified counsel was critical to the performance of her  
8 duties and obligations under the Appointment Orders. Accordingly, pursuant to the  
9 authority granted to her in Section XII.F. of the TRO, the Receiver engaged Allen Matkins  
10 Leck Gamble Mallory & Natsis, LLP (“Allen Matkins”) as her general counsel for the  
11 receivership (with attorneys located in Southern California) and Semenza Rickard Law as  
12 local counsel in Las Vegas.

13 This Application seeks approval of \$88,298.85 in fees for a total of 140 hours  
14 worked, and payment on an interim basis of 80% of that amount, or \$70,639.08. Allen  
15 Matkins has agreed to discount its standard hourly rates by 10% for this case. In addition,  
16 the Commission requested that the Receiver and her professionals consider discounting  
17 their fees to a larger degree due to the importance of preserving receivership funds for  
18 distribution to harmed consumers, and so Allen Matkins agreed to make a one-time further  
19 reduction of \$15,000 for this fee application. The work performed is described task-by-  
20 task in **Exhibit A**<sup>1</sup> and is broken down into the following categories:

21 <b>Category</b>	<b>Hours</b>	<b>Amount</b>
22 General Receivership	49.40	\$39,791.70
23 Reporting	7.20	\$5,799.60
24 Asset Investigation & Recovery	78.50	\$53,760.60
25 Claims & Distributions	4.90	\$3,946.95

27 <sup>1</sup> While Allen Matkins has made efforts to ensure that its billing entries are consistent  
28 across categories, certain activities lend themselves to more than one category, or may  
be difficult to categorize. In any event, **Exhibit A** reflects the actual time spent by  
Allen Matkins personnel, and contains accurate descriptions of the services rendered.

<b>Total Fees</b>	140.00	\$103,298.85
<b>One-time Reduction</b>		(\$15,000)
<b>Net Total</b>		\$88,298.85

The initial phase of a complex equity receivership always involves substantial work by the receiver and professionals to (a) identify and secure cash, computers and other assets, (b) preserve their value, (c) investigate and pursue recovery of funds disbursed from the Receivership Entities' accounts, (d) gather and review key documents, and (e) advise the Court on the status of the Receiver's activities, among other areas of work. As this type of receivership progresses, fees and costs generally decline as assets are secured and protected, and procedures for the efficient administration of the receivership are put in place.

Allen Matkins has worked diligently and efficiently to assist the Receiver with legal issues facing the receivership estate. The Firm's work has allowed the Receiver to preserve and protect the substantial value of receivership estate assets. Because the firm has worked diligently and efficiently to assist the Receiver in carrying out her Court-ordered duties, it should be compensated on an interim basis for its work.

## **II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED**

### **A. Categories and Descriptions of Work**

#### **1. General Receivership**

Services in this category relate to assisting the Receiver with matters relating to the general administration of the receivership estate and the underlying litigation. Initially, Allen Matkins' work within this category focused on the review and analysis of key orders and pleadings, the evidence presented by the Commission, and case materials. This work was necessary to advise the Receiver on legal issues relating to the scope of the receivership, and the duties and powers conferred upon her by the Court pursuant to the Appointment Orders. In addition, Allen Matkins assisted with the filing of the Receiver's bond and, as required under 28 U.S.C. § 754, assisted the Receiver in promptly filing the

1 Complaint and Appointment Order in the Central District of California, where the  
2 Receivership Entities' assets are located. The effect of this filing is to extend the Court's  
3 territorial jurisdiction to receivership assets and interests located within the Central District  
4 of California.<sup>2</sup>

5 Attorney Ted Fates attended the hearings held on December 5, 2024 and December  
6 19, 2024, and analyzed and advised the Receiver on various legal issues raised in advance  
7 of and during these hearings. The firm also assisted and advised the Receiver regarding  
8 the oppositions filed by Student Processing Center and SPCTwo, as well as with  
9 responding to their requests for documents and information. Allen Matkins also worked  
10 on the Receiver's declaration regarding Preliminary Investigative Findings, which was  
11 filed on December 17, 2024 (Dkt. 36). The firm assisted the Receiver in reviewing a  
12 revising engagement agreements for local counsel in Las Vegas, as well as the forensic  
13 computer consultant used by the Receiver to collect and preserve data on computer hard  
14 drives. The reasonable and necessary fees for Allen Matkins' work in this category total  
15 \$39,791.70.

## 16 2. Asset Investigation & Recovery

17 The substantial services in this category relate generally to efforts to identify,  
18 secure, preserve, investigate and recover receivership assets. As can be expected during  
19 the early stage of a receivership, investigation-related tasks comprised the largest category  
20 of Allen Matkins' work during the Application Period. The tasks performed include the  
21 following:

- 22 • Issuing subpoenas to financial institutions, vendors, website/domain hosting  
23 companies, recipients of potential receivership assets, and others involved  
24 with or otherwise connected to the Receivership Entities or their assets in  
25 some manner;

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27  
28 <sup>2</sup> As additional assets located in other districts are identified, Allen Matkins will assist  
the Receiver with necessary filings under Section 754.

- 1 • Issuing demand and asset turnover letters to recipients believed to be in  
2 possession of receivership assets in order to enable the Receiver to recover  
3 and gain control over the assets;
- 4 • Issuing document preservation letters to recipients believed to be in  
5 possession of the Receivership Entities' books and records;
- 6 • Gathering, organizing, and reviewing documents and information obtained  
7 from third parties including, but not limited to, banking and other financial  
8 records, legal files, and investor communications;
- 9 • Analyzing customer transactions and associated documentation in order to  
10 develop a better understanding of the nature and scope of the Receivership  
11 Entities' enterprise;
- 12 • Promptly addressing, communicating with third parties, and assisting the  
13 Receiver with recovery of Receivership Entity funds; and
- 14 • Addressing discovery disputes in connection with third-party subpoenas.

15 As briefly addressed above, Allen Matkins devoted considerable time to identifying,  
16 securing and recovering receivership assets. Despite the provisions of the Appointment  
17 Orders, no information or cooperation regarding the turnover of assets to the Receiver was  
18 provided by the Receivership Entities' former principals. As noted above, Allen Matkins  
19 also spent considerable time working to locate and recover electronic data of the  
20 receivership entities. The firm also assisted the Receiver in identifying necessary and  
21 appropriate subpoena targets, preparing subpoenas, and conferring with recipients  
22 regarding any production objections and/or issues including, but not limited to, the  
23 allocation of costs associated with preparing a response and producing responsive  
24 materials. Finally, attorney Ted Fates participated in an interview of Defendant Dennise  
25 Merdjanian and the firm prepared a detailed list of document requests, which was issued to  
26 counsel for Eric Caldwell and David Hernandez (none of which documents have been  
27 produced).

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1 The reasonable and necessary fees for Allen Matkins' work in this category total  
2 \$53,760.60.

### 3 **3. Reporting**

4 Allen Matkins' services in this category were focused on preparing the Receiver's  
5 First Interim Report, which was filed on December 4, 2024. Dkt. 23. The reasonable and  
6 necessary fees for Allen Matkins' work in this category total \$5,799.60.

### 7 **4. Claims & Distributions**

8 Services rendered in this category generally relate to the claims and interests of  
9 investors and creditors of the Receivership Entities. Allen Matkins assisted with issues  
10 related to disseminating information about the receivership to student loan customers and  
11 former employees, including notification letters, and information provided on the  
12 receivership website ([www.superiorservicingreceivership.com](http://www.superiorservicingreceivership.com)). The reasonable and  
13 necessary fees for Allen Matkins' work in this category total \$3,946.95.

### 14 **B. Summary of Expenses Requested for Reimbursement**

15 Allen Matkins requests that the Court approve reimbursement of \$896.89 in out-of-  
16 pocket costs. The itemization of such expenses is summarized below by billing category.

17 <b>Category</b>	<b>Total</b>
18 Messenger/FedEx Fees	\$667.19
19 Service of Process	\$215.40
20 Duplication	\$14.30
21 <b>Total Costs</b>	<b>\$896.89</b>

### 23 **III. THE FEES AND COSTS ARE REASONABLE**

#### 24 **AND SHOULD BE ALLOWED**

25 "As a general rule, the expenses and fees of a receivership are a charge upon the  
26 property administered." *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994). These  
27 expenses include the fees and expenses of this Receiver and her professionals, including  
28

1 Allen Matkins. Decisions regarding the timing and amount of an award of fees and costs  
2 to the Receiver and her professionals are committed to the sound discretion of the Court.  
3 *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992) (rev'd in part on other grounds,  
4 998 F.2d 922 (11th Cir. 1993)).

5 In allowing fees, a court should consider “the time, labor and skill required, but not  
6 necessarily that actually expended, in the proper performance of the duties imposed by the  
7 court upon the receiver. . . , the fair value of such time, labor and skill measured by  
8 conservative business standards, the degree of activity, integrity and dispatch with which  
9 the work is conducted and the result obtained.” *United States v. Code Prods. Corp.*, 362 F.  
10 2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted). In practical terms, receiver  
11 and professional compensation thus ultimately rests upon the result of an equitable, multi-  
12 factor balancing test involving the “economy of administration, the burden that the estate  
13 may be able to bear, the amount of time required, although not necessarily expended, and  
14 the overall value of the services to the estate.” *In re Imperial 400 Nat'l, Inc.*, 432 F.2d  
15 232, 237 (3d Cir. 1970). Regardless of how this balancing test is formulated, no single  
16 factor is determinative and “a reasonable fee is based [upon] all circumstances surrounding  
17 the receivership.” *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F. Supp.  
18 465, 480 (S.D. Tex. 1974).

19 As a preliminary matter, the Appointment Order confer on the Receiver substantial  
20 duties and powers, including to conduct such investigation and discovery as may be  
21 necessary to locate and account for all Receivership Assets, to take such action as is  
22 necessary and appropriate to assume control over and preserve Receivership Assets, and to  
23 employ attorneys and others to investigate and, where appropriate, institute, pursue, and  
24 prosecute all claims and causes of action of whatever kind and nature. *See Appointment*  
25 *Order, Section XI.*

26 As previously noted, the Receiver promptly determined that utilizing a few third-  
27 party vendors and her experienced staff at E3 as well as experienced, qualified counsel was  
28 critical due to the lack of records, size and complexity of the receivership estate. Allen

1 Matkins has submitted a detailed fee application which describes the nature of the services  
2 rendered. *See* **Exhibit A**. Allen Matkins has endeavored to staff matters as efficiently as  
3 possible while remaining cognizant of the complexity of issues presented. As noted above,  
4 the request for fees is based on Allen Matkins' customary billing rates charged for  
5 comparable services provided in other matters, less a 10% discount and a further one-time  
6 reduction of \$15,000 for this fee application.

7 The work performed by Allen Matkins was essential to carrying out the Receiver's  
8 Court-ordered duties. The Receiver and Allen Matkins have worked diligently since the  
9 Receiver's appointment to preserve and protect the assets of the receivership estate,  
10 maximize the funds available for ultimate distribution to customers and creditors, and  
11 carry out the Receiver's other duties pursuant to the Appointment Order. Moreover, Allen  
12 Matkins seeks payment of only 80% of fees incurred on an interim basis in recognition of  
13 the fact that its work in assisting the Receiver is ongoing. Payment of the proposed 20%  
14 holdback will be sought at the conclusion of the receivership. Allen Matkins' fees are fair  
15 and reasonable and should be approved and paid on an interim basis.

16 **IV. CONCLUSION**

17 Allen Matkins therefore respectfully request that this Court enter an Order:

- 18 1. Approving Allen Matkins' fees of \$88,298.85;
- 19 2. Authorizing and directing the Receiver to pay 80% of approved fees, or  
20 \$70,639.08, from the assets of the Receivership Entities;
- 21 3. Approving Allen Matkins' costs in the amount of \$896.89, and authorizing  
22 and directing the Receiver to reimburse such costs in full; and
- 23 4. For such other and further relief as the Court deems appropriate.

24  
25 Dated: January 21, 2025

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

26  
27 By: Edward G. Fates

EDWARD G. FATES  
Attorneys for Receiver  
Krista L. Freitag

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**CERTIFICATE OF SERVICE**

I am employed by the law firm of Allen Matkins Leck Gamble Mallory & Natsis LLP in San Diego County, California. I am over the age of 18 and not a party to this action. The business address is 600 West Broadway, 27th Floor, San Diego, California 92101-0903.

I hereby certify that on the 21<sup>st</sup> day of January 2025, I served the document(s), described as:

- **FIRST INTERIM FEE APPLICATION OF ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP, GENERAL COUNSEL TO THE RECEIVER, KRISTA L. FREITAG, FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES**

By electronic service via CM/ECF System to all parties appearing in this case in accordance with FRCP and District Court Local Rules:

**FEDERAL TRADE COMMISSION**

**John R. O’Gorman, Esq.**, jogorman@ftc.gov  
**Luis H Gallegos, Esq.**, lgallegos@ftc.gov  
**Reid Abram Tepfer, Esq.**, rtepfer@ftc.gov  
*Attorneys for Federal Trade Commission*

**CORY READE DOWS & SHAFER**

**Robert Christopher Reade, Esq.**, Creade@crdslaw.com, adavid@crdslaw.com, crodriguezvissek@crdslaw.com, cweber@crdslaw.com, kkeyes@crdslaw.com, mrodriguez@crdslaw.com, ygiraud@crdslaw.com  
**Paul Rowland Graff, Esq.**, rgraff@crdslaw.com, attorneygraff@gmail.com, cweber@crdslaw.com, ygiraud@crdslaw.com  
*Attorneys for Defendant Dennise Merdjanian*

I declare under penalty of perjury that the foregoing is true and correct.

*Susan L. Salerno*

\_\_\_\_\_  
Susan L. Salerno  
An Employee of Allen Matkins Leck Gamble  
Mallory & Natsis LLP

**EXHIBIT INDEX**

<b>EXHIBIT</b>	<b>DESCRIPTION</b>	<b>PAGE NOS.</b>
Exhibit A	Allen Matkins Leck Gamble Mallory & Natsis LLP Billing Entries	1-25

## **EXHIBIT A**

# **Allen Matkins Leck Gamble Mallory & Natsis LLP Billing Entries**

01/09/25 14:29:44 PROFORMA STATEMENT FOR MATTER 395887.00002 (Krista Freitag, as Receiver for Superior) (General Receivership)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward      Matter #: 395887.00002      Client Name: Krista Freitag, as Receiver for Superior  
 (Ted)  
 Date of Last Billing:      Matter Name: General Receivership  
 Proforma Number: 1309829  
 Client/Matter Joint Group # 395887.1      Client Matter Number:

**Fees for Matter 395887.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
11/22/24	9861258	Analyze TRO appointing receiver and freezing assets (.5) discuss and advise Receiver re: same and initial takeover tasks (1.4) communications with counsel for FTC re: service, asset freeze, office location, computers, and related issues (.6) research regarding potential related entity (.5) assist Receiver in preparing letter to Defendant with document and information requests (.4)	Fates, Edward (Ted)	3.40	2,738.70	2,738.70	WO	HD	TR	_____
11/24/24	9861256	Advise Receiver on service of process, bank freeze, potential affiliated entities and office locations, and related takeover issues (1.6) assist in preparing letters to landlord, banks, and vendors (.6)	Fates, Edward (Ted)	2.20	1,772.10	4,510.80	WO	HD	TR	_____
11/25/24	9861255	Analyze TRO provisions and information relating to related businesses and potential additional receivership entities (1.1) discuss same with Receiver (.7) communications with counsel for FTC regarding same and service / asset freeze issues (.5) participate and advise Receiver regarding takeover of office location in Brea, interview employees, analyze documents on site (8.4)	Fates, Edward (Ted)	10.70	8,618.85	13,129.65	WO	HD	TR	_____

01/09/25 14:29:44 PROFORMA STATEMENT FOR MATTER 395887.00002 (Krista Freitag, as Receiver for Superior) (General Receivership)

**Fees for Matter 395887.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
11/26/24	9861294	Analyze allegations in FTC complaint, ex parte application for TRO, and supporting evidence (.9) Advise on issues relating to filing of Receiver's bond as required by TRO (.4) advise Receiver on takeover tasks and affiliated entities (1.3) revise draft letter to IT support person for receivership entities (.4) revisions to engagement agreement with forensic computer consultant (.8)	Fates, Edward (Ted)	3.80	3,060.90	16,190.55	WO	HD	TR	_____
12/02/24	9867835	Communications with FTC counsel regarding unsealing of case, hearing on 12/5 and related issues (.4) communications with local counsel in Las Vegas re: same and pro hac vice applications (.8) analyze FTC request to appear by video and advise Receiver re: same (.2)	Fates, Edward (Ted)	1.40	1,127.70	17,318.25	WO	HD	TR	_____
12/03/24	9868650	Communications with Receiver and local counsel in NV regarding notice of appearance, order regarding video appearance, and logistics for 12/5 hearing (.3) revisions to pro hac vice application (.2) work on notice of filing of Receiver's bond (.2)	Fates, Edward (Ted)	0.70	563.85	17,882.10	WO	HD	TR	_____
12/04/24	9869814	Respond to request for court clerk information for video appearance from D. Merdjanian (.2) call with counsel for FTC to discuss 12/5 hearing, Receiver's declaration, issues raised by E. Caldwell, and related matters (.6) analyze supplemental brief filed by FTC (.3) discuss steps for takeover of Accredited offices with	Fates, Edward (Ted)	1.50	1,208.25	19,090.35	WO	HD	TR	_____

01/09/25 14:29:44 PROFORMA STATEMENT FOR MATTER 395887.00002 (Krista Freitag, as Receiver for Superior) (General Receivership)

**Fees for Matter 395887.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
		Receiver (.4)								
12/05/24	9871222	Analyze objection, Caldwell declaration, and exhibits filed by SPC / SPC2 (1.1) discuss same with Receiver (.5) call with SEC counsel regarding 12/5 hearing (.3) attend hearing on TRO and PI Order (1.9) discuss same with Receiver (.3) advise Receiver on issues relating to Slack messaging data (.5)	Fates, Edward (Ted)	4.60	3,705.30	22,795.65	WO	HD	TR	_____
12/06/24	9872294	Analyze preliminary injunction order as to Superior Servicing (.3) advise Receiver re: same (.1) advise Receiver on draft message to employees (.4) communications with counsel for D. Merdjanian (.3)	Fates, Edward (Ted)	1.10	886.05	23,681.70	WO	HD	TR	_____
12/10/24	9877071	Analyze requests for documents from counsel for Caldwell, Hernandez, SPC, SPCTwo and discuss same with Receiver (.4) call with Receiver and counsel for FTC re: same and information in CRM databases (1.3) communications with counsel for Caldwell (.4)	Fates, Edward (Ted)	2.10	1,691.55	25,373.25	WO	HD	TR	_____
12/11/24	9878134	Advise Receiver on engagement letters for local counsel and forensic computer consultant (.4) analyze communications and requests for documents from counsel for Caldwell and counsel for FTC (.6) discuss same with Receiver (.9) prepare responses to same (.4) conference call with Receiver, Caldwell and counsel for Caldwell regarding CRM data for SPC and SPCTwo (.8) communications with counsel for FTC	Fates, Edward (Ted)	3.20	2,577.60	27,950.85	WO	HD	TR	_____

01/09/25 14:29:44 PROFORMA STATEMENT FOR MATTER 395887.00002 (Krista Freitag, as Receiver for Superior) (General Receivership)

**Fees for Matter 395887.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
		regarding 12/19 hearing (.1)								
12/12/24	9879485	Communications with counsel for D. Merdjanian (.4) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.50	402.75	28,353.60	WO	HD	TR	_____
12/13/24	9880685	Analyze opposition briefs and declarations/exhibits filed by D. Merdjanian and SPC/SPC2 (.8) discuss same with Receiver (.5) call with Receiver and counsel for FTC regarding Receiver investigation, findings, and potential declaration regarding same (.5) call with counsel for D. Merdjanian (.2) communications with landlord for 3020 Saturn office (.5) work on Receiver declaration (1.7)	Fates, Edward (Ted)	4.20	3,383.10	31,736.70	WO	HD	TR	_____
12/16/24	9883749	Follow up communications with counsel for D. Merdjanian regarding possible declaration (.2) analyze and revise proposed contract with accounting software vendor (.6) discuss same with Receiver (.1) communications with local counsel regarding 12/19 hearing (.1) communications with FTC counsel regarding Merdjanian response (.1) review answer filed by D. Merdjanian (.2)	Fates, Edward (Ted)	1.30	1,047.15	32,783.85	WO	HD	TR	_____
12/17/24	9886948	Communications with FTC counsel and Receiver regarding affiliated entity and bank account signor issues for proposed PI Order (1.3) analyze responsive briefs and declarataions filed by FTC (.6) discuss same and anticipated motion for order in aid of receivership with Receiver (.4)	Fates, Edward (Ted)	2.40	1,933.20	34,717.05	WO	HD	TR	_____

01/09/25 14:29:44 PROFORMA STATEMENT FOR MATTER 395887.00002 (Krista Freitag, as Receiver for Superior) (General Receivership)

**Fees for Matter 395887.00002.(General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
12/18/24	9888826	Analyze Caldwell / SPC withdrawal of opposition papers and advise Receiver re: same (.3) analyze and discuss affiliated entity issue with Receiver (.4)	Fates, Edward (Ted)	0.70	563.85	35,280.90	WO	HD	TR	_____
12/19/24	9888742	Prepare for and attend hearing on FTC motion for Preliminary Injunction Order (3.2) discuss same with Receiver and counsel for FTC (.6) communications with counsel for Caldwell and Hernandez (.3) analyze preliminary injunction order as to D. Merdjanian (.3) discuss issue regarding affiliated entity not included in PI Order with Receiver (.3)	Fates, Edward (Ted)	4.70	3,785.85	39,066.75	WO	HD	TR	_____
12/20/24	9889403	Call/emails with counsel for the FTC and counsel for Caldwell and Hernandez regarding frozen accounts, financial disclosures, and potential settlement / mediation	Fates, Edward (Ted)	0.90	724.95	39,791.70	WO	HD	TR	_____

**Disbursements for Matter 395887.00002 (General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Type</b>	<b>Quantity</b>	<b>Amt</b>	<b>Circle</b>	<b>Action</b>		
11/26/24	2909338	BW – Duplication - Black & White Copies	35.00	3.50	WO	HD	TR	_____
11/26/24	2911804	MSNGR – Federal Express - Ship To: Attn Michael McKnight - Set Forth, Inc	0.00	28.54	WO	HD	TR	_____
11/27/24	2912323	MSNGR – Federal Express - Ship To: Answer First Communications - Attn Officer or General Coun	0.00	31.51	WO	HD	TR	_____
11/27/24	2912324	MSNGR – Federal Express - Ship To: Citracado Market Advisors Corp - Attn Officer or General Coun	0.00	24.59	WO	HD	TR	_____
11/27/24	2912325	MSNGR – Federal Express - Ship To: Redstone Print & Mail,	0.00	25.33	WO	HD	TR	_____

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**Disbursements for Matter 395887.00002 (General Receivership)**

<b>Trans Date</b>	<b>Index</b>	<b>Type</b>	<b>Quantity</b>	<b>Amt</b>					
11/27/24	2912326	Inc - Attn Officer or General Coun MSNGR – Federal Express - Ship To: Skywave Communications, Inc - Attn Officer or General Coun	0.00	31.51	WO	HD	TR	_____	
11/27/24	2912327	MSNGR – Federal Express - Ship To: TextVending Inc - Attn Officer or General Coun	0.00	24.59	WO	HD	TR	_____	
11/27/24	2912328	MSNGR – Federal Express - Ship To: Twilio Inc - Attn Officer or General Coun	0.00	29.92	WO	HD	TR	_____	
11/27/24	2912329	MSNGR – Federal Express - Ship To: Xactus, LLC - Attn Officer or General Coun	0.00	31.51	WO	HD	TR	_____	
11/27/24	2914758	POS – Process of Service - Nationwide Legal LLC - Microsoft Corporation, Letter Dated November 27, 2024 Re: Request for Turnover or Restriction of Accounts and Preservation of Data; Notice of Electronic Filing; Ex Parte Temporary Restraining Order with Asset Freeze, Appointment of a Temporary Receiver, and Order to Show Cause Why a Preliminary Injunction Should Not Issue (Filed Under Seal)	0.00	215.40	WO	HD	TR	_____	
12/02/24	2913644	DCSRCH – First Legal Network - USDC District of Nevada; EX PARTE TEMPORARY RESTRAINING ORDER	0.00	200.50	WO	HD	TR	_____	
12/02/24	2913645	DCSRCH – First Legal Network - California Supreme Court, Obtain a Certificate of Good Standing	0.00	104.84	WO	HD	TR	_____	
12/03/24	2912334	MSNGR – Federal Express - Ship To: Ted Fates - Allen Matkins Leck Gamble Mall	0.00	26.23	WO	HD	TR	_____	
12/04/24	2911727	BW – Duplication - Black & White Copies	36.00	3.60	WO	HD	TR	_____	
12/04/24	2912792	MSNGR – Federal Express - Ship To: Attn Compliance Department - GoDaddy com, LLC	0.00	25.33	WO	HD	TR	_____	
12/04/24	2914218	MSNGR – Federal Express - Ship To: Ted Fates - Allen Matkins Leck Gamble Mall	0.00	25.33	WO	HD	TR	_____	
12/06/24	2911909	BW – Duplication - Black & White Copies	72.00	7.20	WO	HD	TR	_____	
12/06/24	2912801	MSNGR – Federal Express - Ship To: Officer or General Counsel - Slack Technologies, Inc	0.00	28.73	WO	HD	TR	_____	
12/06/24	2912802	MSNGR – Federal Express - Ship To: Office or General Counsel - Slack Technologies, Inc	0.00	28.73	WO	HD	TR	_____	

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**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	49.40	805.50	39,791.70
		<u>49.40</u>		\$39,791.70
Subtotal Fees				\$39,791.70
Discount				0.00
Total Fees				39,791.70
Total Disbursements				896.89

**Attorney Billing Instructions**

( )	BILL ALL	( )	Hold
( )	BILL FEES ONLY	( )	Write Off
( )	BILL COST ONLY	( )	Transfer All

**Billing Instructions**

expires 6/30/2025: 10% off standard rates (automatic); no text editing; copies @ .10

**Account Summary – As Of 01/09/25**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	40,744.25	40,677.75	66.50	886.05	886.05	0.00	41,574.64	40,677.75	896.89
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>41,588.20</b>	<b>40,677.75</b>	<b>910.45</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

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**Billing Address**

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Krista Freitag, as Receiver for Superior Servicing LLC  
Krista L. Freitag  
kfreitag@ethreadvisors.com  
E3 Advisors  
355 South Grand Avenue, Suite 2450  
Los Angeles, CA 90071

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01/09/25 14:29:45 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward (Ted)      Matter #: 395887.00003      Client Name: Krista Freitag, as Receiver for Superior  
 Date of Last Billing:      Matter Name: Asset Investigation & Recovery  
 Proforma Number: 1309829  
 Client/Matter Joint Group # 395887.1      Client Matter Number:

**Fees for Matter 395887.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/23/24	9861257	Advise Receiver and G. Rodriguez on document subpoenas and notices / demands to payroll vendor, web hosting vendors	Fates, Edward (Ted)	0.90	724.95	724.95	WO	HD	TR	_____
11/25/24	9864506	Confer with Ted Fates regarding preparation of deposition subpoenas and takeover update (0.2); Prepare seven deposition subpoenas to potentially be served at takeover (1.1)	Pham, Matt D.	1.30	801.45	1,526.40	WO	HD	TR	_____
11/26/24	9861572	Analyze and advise on various document subpoenas and notice letters to be issued (1.4) discuss same with Receiver (.6) revise letter to CRM software vendor (.3) discuss same with Receiver (.3)	Fates, Edward (Ted)	2.60	2,094.30	3,620.70	WO	HD	TR	_____
11/26/24	9864512	Research into possible points of contact for Set Forth (0.6); Phone call with Set Forth representative regarding possible point of contact for preservation request (0.4); Phone call with Michael McKnight regarding preservation request to Set Forth (0.1); Prepare turnover/preservation request letter	Pham, Matt D.	5.90	3,637.35	7,258.05	WO	HD	TR	_____

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**Fees for Matter 395887.00003.(Asset Investigation & Recovery)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
		to Set Forth (1.8); Confer with Ted Fates regarding updates on Set Forth and Microsoft preservation requests (0.2); Finalize letter to Set Forth (0.3); Email correspondence with Michael McKnight of Set Forth regarding preservation request (0.2); Confer with Ted Fates regarding Set Forth's response to preservation request (0.1); Research into possible points of contact for Microsoft for legal requests (1.2); Begin preparing turnover/preservation request letter to Microsoft (0.6); Review client's various emails regarding information for preservation requests (0.4)								
11/27/24	9862537	Prepare correspondence to counsel for A. Ortiz regarding requests for information and documents (.6) advise G. Rodriguez re: same (.3) advise on notice / preservation letters to vendors and third parties (1.3) discuss same with Receiver (.7) discuss emails / texts to D. Merdjanian and E. Caldwell with Receiver (.3) communications with counsel for E. Caldwell (.5)	Fates, Edward (Ted)	3.70	2,980.35	10,238.40	WO	HD	TR	_____
11/27/24	9864517	Continue preparing turnover/preservation request letter to Microsoft (0.4); Phone calls with Microsoft regarding point person for turnover/preservation request (0.3); Confer with Ted Fates regarding Microsoft turnover/preservation request and other preservation requests (0.1); Finalize turnover/preservation request letter to Microsoft (0.2); Prepare seven preservation requests to various third parties (2.3); Confer with Ted Fates regarding Set Forth's	Pham, Matt D.	3.70	2,281.05	12,519.45	WO	HD	TR	_____

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**Fees for Matter 395887.00003.(Asset Investigation & Recovery)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
		response to preservation request (0.2); Email correspondence with Michael McKnight of Set Forth regarding receiver's questions (0.2)								
11/29/24	9864108	Call with Receiver and counsel for E. Caldwell	Fates, Edward (Ted)	0.50	402.75	12,922.20	WO	HD	TR	_____
12/02/24	9866122	Analyze and advise Receiver on investigative and recovery tasks relating to banks, payment processors, vendors and law firm (2.4) analyze documents and prepare correspondence to counsel for E. Caldwell regarding affiliated entities and connections between entities (1.8) discuss same with Receiver (.3)	Fates, Edward (Ted)	4.50	3,624.75	16,546.95	WO	HD	TR	_____
12/02/24	9867812	Tel. conference with T. Fates regarding preparing preservation and turnover letter to Slack.com (.3); prepare preservation and turnover letter to slack technologies (1.0).	Kebeh, Alhamorlai "Mo"	1.30	713.70	17,260.65	WO	HD	TR	_____
12/02/24	9875330	Confer with Ted Fates regarding status of preservation requests (0.1); Phone call with Forth's general counsel regarding status of turnover of accounts (0.1)	Pham, Matt D.	0.20	123.30	17,383.95	WO	HD	TR	_____
12/03/24	9868624	Communications with law firm in NY regarding payments received from Superior Servicing (.6) communications with G. Rodriguez regarding contact with direct mailing vendor (.2) communications with counsel for direct mailing vendor (.4) discuss communication to counsel for E. Caldwell with Receiver and revise same (.9) advise on issues regarding messaging	Fates, Edward (Ted)	5.20	4,188.60	21,572.55	WO	HD	TR	_____

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**Fees for Matter 395887.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		vendor (.5) call with Receiver and D. Merdjanian (1.4) call with Receiver, E. Caldwell and counsel for E. Caldwell (1.2)								
12/03/24	9868775	Review correspondence from Slack regarding Receiver preservation/turnover request, correspondence with T. Fates and slack representative regarding same (.8); tel. conference with M. Pham regarding preparing subpoena to GoDaddy (.1); Review engagement agreement receivership entity's former counsel and related correspondence regarding turnover of funds (.1).	Kebeh, Alphamorlai "Mo"	1.00	549.00	22,121.55	WO	HD	TR	_____
12/03/24	9875336	Prepare preservation letter to GoDaddy (0.3); Update preservation letter to GoDaddy in light of fax issues (0.2); Email correspondence with Geno Rodriguez regarding attempts to reach GoDaddy (0.2)	Pham, Matt D.	0.70	431.55	22,553.10	WO	HD	TR	_____
12/04/24	9869807	Prepare requests for documents to be issued to E. Caldwell (1.4) discuss same with Receiver (.6) communications with counsel engaged by Superior Servicing to address investigation by Washington regulators (.5) call with Receiver, FTC counsel and SetForth CRM software vendor (.5) discuss same with Receiver (.2) advise on issues relating to communications and requests for documents from IT employee (.4)	Fates, Edward (Ted)	3.60	2,899.80	25,452.90	WO	HD	TR	_____
12/04/24	9870023	Zoom meeting with Slack regarding turnover issue (.5); Review preservation letters sent to microsoft and godaddy,	Kebeh, Alphamorlai "Mo"	2.40	1,317.60	26,770.50	WO	HD	TR	_____

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**Fees for Matter 395887.00003.(Asset Investigation & Recovery)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
		correspondence with client regarding same (.3); Analyze TRO in connection with slack turnover issue, prepare for call regarding same (.9); draft analysis memo to Slack regarding turnover issue (.7).								
12/04/24	9875342	Confer with Ted Fates regarding recap of meetings with defendants and related parties	Pham, Matt D.	0.30	184.95	26,955.45	WO	HD	TR	_____
12/05/24	9871239	Analyze turnover authorization form from Slack (.1); conference with T. fates regarding status of receiver's slack investigation (.1); revise slack form turnover agreement, memo to T. fates regarding same in connection with turnover issues (1.3).	Kebeh, Alphamorlai "Mo"	1.50	823.50	27,778.95	WO	HD	TR	_____
12/05/24	9871285	Communications with counsel for CRM vendor, Receiver and FTC counsel regarding access to entity accounts (.4) advise on vendor issues relating to Citracado and Xactus (.3)	Fates, Edward (Ted)	0.70	563.85	28,342.80	WO	HD	TR	_____
12/05/24	9875345	Email correspondence with client regarding response from Xactus	Pham, Matt D.	0.10	61.65	28,404.45	WO	HD	TR	_____
12/06/24	9872059	Tel. conf. with T. Fates regarding status of slack turnover and strategy (.2); correspondence with slack regarding turnover issues (.1); analysis of TRO in connection with correspondence from Slack regarding turnover issue (.4); Zoom conference with Slack regarding turnover issues (.5); correspondence with T. Fates regarding debrief of call with slack	Kebeh, Alphamorlai "Mo"	3.30	1,811.70	30,216.15	WO	HD	TR	_____

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**Fees for Matter 395887.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		representative (.2); analyze draft correspondence regarding turnover of receivership estate property (.2); draft detailed response memo to slack regarding analysis of turnover issue and receiver's authority, analysis of TRO in connection with same (1.7).								
12/06/24	9872062	Analyze and advise on next steps regarding slack messaging accounts, preservation and access to same (.4) discuss same with Receiver (.3) advise Receiver on issues relating to accounts at Banner Bank (.2) analyze documents provided by Citracado (.2)	Fates, Edward (Ted)	1.10	886.05	31,102.20	WO	HD	TR	_____
12/06/24	9884892	Phone call with Xactus regarding account/data available to turn over to receiver (0.1); Phone call with Redstone's counsel regarding account/data available for turnover (0.2)	Pham, Matt D.	0.30	184.95	31,287.15	WO	HD	TR	_____
12/09/24	9874363	Correspondence with T. Fates regarding follow up letter to slack regarding turnover issues (.1); tel. conf. with T. Fates regarding strategy regarding Slack turnover issue (.5); Revise memo to Slack regarding receiver's position regarding turnover issue, correspondence with T. fates regarding same (.5).	Kebeh, Alphamorlai "Mo"	1.10	603.90	31,891.05	WO	HD	TR	_____
12/09/24	9874753	Advise on issues and next steps for preservation and access to Slack messaging data (.7) discuss same with Receiver (.4) communications with counsel for D. Merdjanian regarding information and	Fates, Edward (Ted)	5.70	4,591.35	36,482.40	WO	HD	TR	_____

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**Fees for Matter 395887.00003.(Asset Investigation & Recovery)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
		documents needed (.8) communications with Receiver and G. Rodriguez regarding information and computers requested from IT person (1.1) communications with counsel for IT person (.9) analyze information provided by IT person (.8) communications with former counsel for Superior re: recovery of retainer funds (.4) analyze documents and information provided by counsel for D. Merdjanian (.4) discuss same with Receiver (.2)								
12/09/24	9884697	Email correspondence with various vendors' counsel regarding account/data available for turnover (0.3); Email correspondence with client regarding updates on responses to preservation requests (0.6)	Pham, Matt D.	0.90	554.85	37,037.25	WO	HD	TR	_____
12/10/24	9876998	Correspondence with T. Fates and Slack's counsel in connection with resolution of turnover issue (.2).	Kebeh, Alphamorlai "Mo"	0.20	109.80	37,147.05	WO	HD	TR	_____
12/10/24	9877037	Advise on next steps regarding Slack messaging data and preservation of same (.2) communications with Receiver and former counsel for Superior regarding recovery of retainer funds and production of emails (.5) discuss investigative tasks relating to Slack, Carter Bank, and T. Storey with Receiver and G. Rodriguez (.9) advise on former counsel production issues (.2)	Fates, Edward (Ted)	1.80	1,449.90	38,596.95	WO	HD	TR	_____
12/10/24	9877684	Communications with T. Fates; create share file link for transmission of prior counsel communications.	Pendleton, Michelle	0.20	78.30	38,675.25	WO	HD	TR	_____

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**Fees for Matter 395887.00003.(Asset Investigation & Recovery)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle Action</b>			
12/10/24	9884713	Email correspondence with Microsoft's counsel regarding preservation request and scheduling call (0.2); Phone call with TextVending's counsel regarding account/information details (0.2)	Pham, Matt D.	0.40	246.60	38,921.85	WO	HD	TR	_____
12/11/24	9878304	Review and process correspondence files from F. Shipkevich; communications with T. Fates and F. Shipkevich	Pendleton, Michelle	0.30	117.45	39,039.30	WO	HD	TR	_____
12/11/24	9878315	Prep for conference with slack counsel regarding turnover issue (.2); Zoom conference with slack counsel regarding account turnover issues (.9); tel. conference with T. Fates regarding debrief of call with slack counsel (.1); review correspondence regarding production of documents from Shipkevich (.1); review memo regarding status of slack turnover issue and status of outgoing preservation letters (.2); Review supplemental production from IDM Endeavors, LLC, correspondence with receiver regarding same (.3); conduct research regarding turnover issues (.4).	Kebeh, Alphamorlai "Mo"	2.20	1,207.80	40,247.10	WO	HD	TR	_____
12/11/24	9878351	Call with counsel for Slack regarding TRO and request for access to Slack messaging channels and preserved messaging data (.9) discuss same with Receiver (.4) review documents provided by former counsel for Superior (.3)	Fates, Edward (Ted)	1.60	1,288.80	41,535.90	WO	HD	TR	_____
12/11/24	9884723	Phone call with GoDaddy regarding point of contact for preservation/turnover requests	Pham, Matt D.	0.20	123.30	41,659.20	WO	HD	TR	_____

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**Fees for Matter 395887.00003.(Asset Investigation & Recovery)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
12/12/24	9879655	Discuss investigative tasks with Receiver including document subpoenas to be issued to banks and communications CRM vendor (.8) advise on preparation of subpoenas and revisions to same (.6)	Fates, Edward (Ted)	1.40	1,127.70	42,786.90	WO	HD	TR	_____
12/12/24	9879949	Communications with T. Fates; research regarding digital banking records and agents; draft Subpoenas, response instructions, and requests for production of documents to JPMorgan Chase Bank and Comerica.	Pendleton, Michelle	1.50	587.25	43,374.15	WO	HD	TR	_____
12/13/24	9880667	Calls with Receiver and CRM vendor regarding data in CRM accounts and access to same (.7) advise Receiver regarding contract with forensic accounting software vendor (.7) advise on service issues for document subpoenas (.2) analyze documents provided by Receiver (.8) analyze transcript from Zoom call with D. Merdjanian (.7) communications with payment processor regarding TRO and request for records (.2)	Fates, Edward (Ted)	3.30	2,658.15	46,032.30	WO	HD	TR	_____
12/16/24	9883302	Work on Receiver declaration regarding investigation and preliminary findings (1.6) discuss same with Receiver (.9) communications with FTC counsel re: same (.5) advise on redaction of exhibits (.2) discuss documents needed from payment processor with Receiver (.2)	Fates, Edward (Ted)	3.40	2,738.70	48,771.00	WO	HD	TR	_____
12/17/24	9885851	Prepare correspondence to payment processor regarding request for information and documents (.4) update and finalize	Fates, Edward (Ted)	2.20	1,772.10	50,543.10	WO	HD	TR	_____

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**Fees for Matter 395887.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		Receiver declaration regarding investigation and findings (.7) discuss same and investigation into affiliated entities with Receiver (.8) advise Receiver on banner Bank issues (.3)								
12/17/24	9886976	Review update from M. pham regarding status of communication with Microsoft (.1).	Kebeh, Alphamorlai "Mo"	0.10	54.90	50,598.00	WO	HD	TR	_____
12/18/24	9887619	Communications with Receiver and former accountant for receivership entities (.2) advise on follow up steps for preservation / turnover letters to vendors (.2)	Fates, Edward (Ted)	0.40	322.20	50,920.20	WO	HD	TR	_____
12/18/24	9893698	Confer with Ted Fates regarding updates and issues with turnover requests	Pham, Matt D.	0.50	308.25	51,228.45	WO	HD	TR	_____
12/19/24	9888454	Communications with Comerica legal processing regarding disclosures and production.	Pendleton, Michelle	0.20	78.30	51,306.75	WO	HD	TR	_____
12/19/24	9893706	Confer with Ted Fates regarding updates on outstanding requests to third parties	Pham, Matt D.	0.40	246.60	51,553.35	WO	HD	TR	_____
12/20/24	9889633	Analyze and advise on response to document subpoena from Comerica bank (.4) call with Receiver, former accountant for receivership entities, and counsel for former accountant regarding production of records, communications, etc. (.8) advise on issues and approach to gaining control over email accounts and domains at Microsoft and Go Daddy (.7)	Fates, Edward (Ted)	1.90	1,530.45	53,083.80	WO	HD	TR	_____
12/20/24	9889690	Review cost estimate from K. Lau of Comerica.	Pendleton, Michelle	0.10	39.15	53,122.95	WO	HD	TR	_____

01/09/25 14:29:45 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

**Fees for Matter 395887.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
12/23/24	9891695	Communications with Go Daddy regarding PI Order, request for control, and compliance with same	Fates, Edward (Ted)	0.50	402.75	53,525.70	WO	HD TR
12/24/24	9894462	Review and analyze communications from K. Lau of Comerica in response to Subpoena; draft response to demand for retainer and costs.	Pendleton, Michelle	0.30	117.45	53,643.15	WO	HD TR
12/25/24	9894748	Review communication from W. Lee (JPMorgan Chase); draft correspondence responding to request for extension and information to provide records in response to Subpoena.	Pendleton, Michelle	0.30	117.45	53,760.60	WO	HD TR

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	45.00	805.50	36,247.50
002510	Pham, Matt D.	14.90	616.50	9,185.85
002603	Pendleton, Michelle	2.90	391.50	1,135.35
002661	Kebeh, Alhamorlai "Mo"	13.10	549.00	7,191.90
		<u>75.90</u>		<u>\$53,760.60</u>
Subtotal Fees				\$53,760.60
Discount				0.00
Total Fees				53,760.60
Total Disbursements				0.00

**Attorney Billing Instructions**

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> Transfer All

01/09/25 14:29:45 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

**Billing Instructions**

expires 6/30/2025: 10% off standard rates (automatic); no text editing; copies @ .10

**Account Summary – As Of 01/09/25**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	55,532.70	55,532.70	0.00	1,772.10	1,772.10	0.00	55,532.70	55,532.70	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>55,532.70</b>	<b>55,532.70</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

Krista Freitag, as Receiver for Superior Servicing LLC  
 Krista L. Freitag  
 kfreitag@ethreadvisors.com  
 E3 Advisors  
 355 South Grand Avenue, Suite 2450  
 Los Angeles, CA 90071

01/09/25 14:29:47 PROFORMA STATEMENT FOR MATTER 395887.00004 (Krista Freitag, as Receiver for Superior) (Reporting)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward      Matter #: 395887.00004      Client Name: Krista Freitag, as Receiver for Superior  
 (Ted)  
 Date of Last Billing:      Matter Name: Reporting  
 Proforma Number: 1309829  
 Client/Matter Joint Group # 395887.1      Client Matter Number:

**Fees for Matter 395887.00004.(Reporting)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
12/02/24	9866965	Discuss preparation and content for first interim report with Receiver	Fates, Edward (Ted)	0.70	563.85	563.85	WO	HD	TR	_____
12/03/24	9868805	Work on content and revisions to first interim report (3.7) discuss same with Receiver (.9)	Fates, Edward (Ted)	4.60	3,705.30	4,269.15	WO	HD	TR	_____
12/04/24	9869801	Discuss revisions and updates to Receiver's first interim report with Receiver (1.2) finalize same and exhibits (.7)	Fates, Edward (Ted)	1.90	1,530.45	5,799.60	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	7.20	805.50	5,799.60
		7.20		\$5,799.60
Subtotal Fees				\$5,799.60
Discount				0.00
Total Fees				5,799.60
Total Disbursements				0.00

**Attorney Billing Instructions**

01/09/25 14:29:47 PROFORMA STATEMENT FOR MATTER 395887.00004 (Krista Freitag, as Receiver for Superior) (Reporting)

( )	BILL ALL	( )	Hold
( )	BILL FEES ONLY	( )	Write Off
( )	BILL COST ONLY	( )	Transfer All

**Billing Instructions**

expires 6/30/2025: 10% off standard rates (automatic); no text editing; copies @ .10

**Account Summary – As Of 01/09/25**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	5,799.60	5,799.60	0.00	0.00	0.00	0.00	5,799.60	5,799.60	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>5,799.60</b>	<b>5,799.60</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

Krista Freitag, as Receiver for Superior Servicing LLC  
 Krista L. Freitag  
 kfreitag@ethreadvisors.com  
 E3 Advisors  
 355 South Grand Avenue, Suite 2450  
 Los Angeles, CA 90071

01/09/25 14:29:51 PROFORMA STATEMENT FOR MATTER 395887.00006 (Krista Freitag, as Receiver for Superior) (Claims & Distributions)

**Preliminary Billing Form**

Billing Atty: 001665 - Fates, Edward (Ted)      Matter #: 395887.00006      Client Name: Krista Freitag, as Receiver for Superior  
 Date of Last Billing:      Matter Name: Claims & Distributions  
 Proforma Number: 1309829  
 Client/Matter Joint Group # 395887.1      Client Matter Number:

**Fees for Matter 395887.00006.(Claims & Distributions)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
12/05/24	9871669	Assist Receiver in drafting notices to employees and customers	Fates, Edward (Ted)	0.50	402.75	402.75	WO	HD	TR	_____
12/06/24	9872061	Revisions to Receiver draft message to student loan borrowers (.8) discuss same with Receiver (.5) advise on postings to website providing information to claimants (.2)	Fates, Edward (Ted)	1.50	1,208.25	1,611.00	WO	HD	TR	_____
12/09/24	9876142	Discuss language for email to student loan borrowers with Receiver (.4) work on revisions to same (.3) communications with G. Rodriguez and landlord for Saturn Street office (.4)	Fates, Edward (Ted)	1.10	886.05	2,497.05	WO	HD	TR	_____
12/10/24	9876984	Communications with Receiver and counsel for Merdjanian regarding creditor bills owed by Accredited and Superior (.5) assist Receiver with voicemail greeting for customers / creditors who call receivership phone line (.2)	Fates, Edward (Ted)	0.70	563.85	3,060.90	WO	HD	TR	_____
12/13/24	9880673	Assist Receiver in formulating responses to investor inquiries	Fates, Edward (Ted)	0.40	322.20	3,383.10	WO	HD	TR	_____

01/09/25 14:29:51 PROFORMA STATEMENT FOR MATTER 395887.00006 (Krista Freitag, as Receiver for Superior) (Claims & Distributions)

**Fees for Matter 395887.00006.(Claims & Distributions)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
12/20/24	9889670	Assist Receiver in preparing updates to former employees and customers/borrowers regarding court hearing, orders, and operations	Fates, Edward (Ted)	0.50	402.75	3,785.85	WO	HD TR
12/23/24	9892680	Advise Receiver on employee claims and payroll issues	Fates, Edward (Ted)	0.20	161.10	3,946.95	WO	HD TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	4.90	805.50	3,946.95
				\$3,946.95
Subtotal Fees				\$3,946.95
Discount				0.00
Total Fees				3,946.95
Total Disbursements				0.00

**Attorney Billing Instructions**

- BILL ALL
- BILL FEES ONLY
- BILL COST ONLY
- Hold
- Write Off
- Transfer All

**Billing Instructions**

expires 6/30/2025: 10% off standard rates (automatic); no text editing; copies @ .10

**Account Summary – As Of 01/09/25**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,946.95	3,946.95	0.00	0.00	0.00	0.00	3,946.95	3,946.95	0.00

01/09/25 14:29:51 PROFORMA STATEMENT FOR MATTER 395887.00006 (Krista Freitag, as Receiver for Superior) (Claims & Distributions)

Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>3,946.95</b>	<b>3,946.95</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

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**Billing Address**

Krista Freitag, as Receiver for Superior Servicing LLC  
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 kfreitag@ethreadvisors.com  
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