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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FEDERAL TRADE COMMISSION

Plaintiff,

v.

SUPERIOR SERVICING LLC, a limited
liability company;

SUNRISE SOLUTIONS USA LLC, a
limited liability company;

ALUMNI ADVANTAGE LLC, a limited
liability company;

STUDENT PROCESSING CENTER
GROUP LLC, a limited liability company;

SPCTWO LLC, a limited liability
company;

ACCREDIT LLC, a limited liability
company;

DENNISE MERDJANIAN, aka Dennise
Correa, individually and as managing
member of SUPERIOR SERVICING LLC;

ERIC CALDWELL, individually and as
owner, officer, or manager of SUPERIOR
SERVICING LLC. SUNRISE

Case No. 2:24-cv-02163-GMN-MDC

**SECOND INTERIM FEE
APPLICATION OF KRISTA L.
FREITAG, COURT-APPOINTED
RECEIVER, FOR PAYMENT OF
FEES AND REIMBURSEMENT OF
EXPENSES**

Ctrm: 7D

Judge: Hon. Gloria M. Navarro

1 SOLUTIONS USA LLC, ALUMNI
2 ADVANTAGE LLC, STUDENT
3 PROCESSING CENTER GROUP LLC,
4 SPCTWO LLC, and ACCREDIT LLC; and

5 DAVID HERNANDEZ, individually and as
6 owner, officer, or manager of SUPERIOR
7 SERVICING LLC, SUNRISE
8 SOLUTIONS USA LLC, ALUMNI
9 ADVANTAGE LLC, STUDENT
10 PROCESSING CENTER GROUP LLC,
11 SPCTWO LLC, and ACCREDIT LLC,

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Defendants.

Krista Freitag ("Receiver"), the Court-appointed permanent receiver for Defendant, Superior Servicing, LLC ("Superior"), its subsidiaries, affiliates, successors and assigns, and any other entity that has conducted any business related to Defendants' student debt relief services, including receipt of Assets derived from any activity that is the subject of the Complaint in this matter, and that the Receiver determines is controlled or owned by any Defendant, including Accredited, LLC, Sunrise Solutions USA, LLC, Alumni Advantage, LLC, Student Processing Center Group, LLC, SPCTWO, LLC, Gold West Financial, LLC, DM Financial, LLC, LJC Music National LLC, South Coast Services, LLC, Business Done Right Inc., ET&C Holdings, LLC, Capital Servicing, LLC, Cornerstone Doc Prep, Inc., Amerifed Doc Prep, LLC, Amerifed Servicing, Inc., Scholastic Solutions LLC, and First Clover Capital, Inc. (collectively the "Receivership Entities" or individually, a "Receivership Entity"), hereby submits this Second Interim Application for Payment of Fees and Reimbursement of Expenses (the "Application"). This Application covers the period from the Receiver's appointment on January 1, 2025 through March 31, 2025 (the "Application Period"), and seeks approval of \$68,324.65 in fees and \$42,647.55 in expenses, and an order authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred (\$54,659.72) and 100% of the expenses incurred (\$42,647.55).

I. INTRODUCTION

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

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 utilizing a few third-party vendors and her experienced staff at E3 Realty
8 Advisors, Inc. dba E3 Advisors (“E3”), as well as experienced, qualified counsel was
9 critical due to the lack of records, size and complexity of the receivership estate.

10 Accordingly, the Receiver has used her team at E3 and engaged a few third-party
11 vendors (e.g., forensic accounting software and forensic computer experts), to assist in
12 carrying out receivership duties and pursuant to the authority granted to her in Section
13 XII.F. of the TRO, the Receiver engaged Allen Matkins Leck Gamble Mallory & Natsis,
14 LLP (“Allen Matkins”) as her general counsel for the receivership (with attorneys located
15 in Southern California) and Semenza Rickard Law as local counsel in Las Vegas.

16 This Application should be read in conjunction with the Receiver's Second Interim
17 Report (“Second Report”) filed on May 9, 2025 (Dkt. 69) as well as the Declaration of
18 Krista Freitag Regarding Preliminary Investigate Findings and Observations filed on
19 December 17, 2024 (Dkt. 36), which summarize the significant progress made by the
20 Receiver and her team as a result of the intensive and diligent work in identifying,
21 securing, assessing and asset recovery efforts in the early stage of this receivership.

22 This Application seeks approval of \$68,324.65 in fees for a total of 305.80 hours
23 worked, and payment on an interim basis of 80% of that amount, or \$54,659.72. The
24 Receiver has agreed to discount her standard hourly rates by 10% for this case. As noted
25 in the first fee application, given the significant amount of hours required in this case
26 (including the time to vacate two offices during this Application Period), the Receiver has
27 billed two individuals on her team at a rate (other than for time spent with customers) that
28 is less than 50% of the typical hourly rate in cases such as this, which resulted in an

approximate \$14,000 reduction in fees in each application period, for a total of over \$28,000 in total to date. The work performed is described task-by-task in Exhibit A¹ and is broken down into the following categories:

Category	Hours	Amount
Tax	11.30	\$3,386.25
General Receivership	53.30	\$18,416.25
Asset Investigation & Recovery	7.90	\$2,805.75
Reporting	21.50	\$7,134.75
Operations & Asset Sales ²	176.00	\$27,874.15
Investors Relations	6.20	\$976.50
Forensic Accounting	29.60	\$7,731.00
Total Fees	305.80	\$68,324.65

The early phase of a complex equity receivership always involves substantial work by the receiver and her professionals to (a) identify operations and secure records, 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 decline as operations are identified, assets are identified, secured and protected, and procedures for the efficient administration of the receivership are put in place.

In this case, the amount of work at the outset was critical to understanding the scope of an expanded enterprise. And with vendors such as Go Daddy and Slack which refused for months to turnover accounts without a specific Court order telling them to do so

¹ While the Receiver has made efforts to ensure that its billing entries are consistent 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 the Receiver's personnel and contains accurate descriptions of the services rendered.

² All travel time has been billed in a separate category at 50% of the timekeeper's discounted hourly rate.

1 (directly), the amount of time necessary to secure as many company records as possible
2 (and get websites shutdown) was extensive.

3 Despite these challenges, the Receiver and her team were able to make substantial
4 progress in identifying, recovering and otherwise pursuing the Receivership Entities' assets
5 and discharging her duties. The vast majority of the work during the Application Period
6 represents the General Receivership and Operations categories. These categories required
7 extensive time to secure the information technology records and to prepare and vacate two
8 fully functioning office locations (nearly half of the Operations time during the
9 Application Period was spent on vacating the offices). In a short period of time, the
10 Receiver and her team were able to commence targeted forensic accounting work which
11 led to the discovery of a large enterprise and the recovery of *more than \$1 million* of cash
12 thus far, adding more than a dozen additional entities to the Receivership Entity list. That
13 said, efforts continue to investigate assets of the enterprise.

14 The Receiver and her team have worked diligently and efficiently to address the
15 issues facing the receivership estate. This work has allowed the Receiver to preserve and
16 protect the substantial value of receivership estate assets. Because the Receiver and her
17 team have worked diligently and efficiently in carrying out the Receiver's Court-ordered
18 duties, she should be compensated on an interim basis for her work.

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

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

21 **1. Tax**

22 Services in this category relate to correspondence with and engagement with the tax
23 accountant used by the Receivership Entities prior to the receivership, the gathering of
24 information necessary to move forward with cost effectively completing tax returns, and
25 associated efforts. The reasonable and necessary fees for the Receiver's work in this
26 category during the Application Period total \$3,386.25.

2. General Receivership

Services in this category relate to the general administration of the receivership estate. The Receiver's work within this category was notably a bit more extensive given the number of additional entities discovered to be a part of a greater enterprise and the lack of cooperation by key information technology vendors (e.g., GoDaddy, Slack, Microsoft). The Receiver's work within this category involved extensive efforts working to gain possession of company electronic data (primarily Slack communications, websites, email accounts, and domains) as well as continued efforts to get data collection/images completed using a Forensic IT Vendor discussed below. The reasonable and necessary fees for the Receiver's work in this category total \$18,416.25.

3. Asset Investigation & Recovery

The tasks performed during the Application Period primarily involved recovery of funds from financial institutions and preparing claims for employee dishonesty insurance coverage. The reasonable and necessary fees for the Receiver's work in this category total \$2,805.75.

4. Reporting

The Receiver's services in this category were focused on starting to prepare the Receiver's Second Interim Report covering the period through March 31, 2025. The reasonable and necessary fees for the Receiver's work in this category total \$7,134.75.

5. Operations

Tasks in this category primarily include accounting and year-end payroll related tasks, coordinating and communicating with employees to retrieve belongings, preparing and vacating offices (included coordinating to get all records and equipment into secure storage) and the ongoing receivership estate operational tasks. It is important to note that travel time associated with physical and virtual office locations has been billed at 50% of the discounted hourly rates.

The reasonable and necessary fees, nearly half of which was incurred preparing and vacating two office spaces, for the Receiver's work in this category total \$27,874.15.

1 **6. Investor Relations**

2 Services rendered in this category generally relate to the ever-important
3 communication with customers of the Receivership Entities. The reasonable and necessary
4 fees for Receiver's work in this category total \$976.50.

5 **7. Forensic Accounting**

6 This category reflects the Receiver's various efforts to review and analyze banking
7 and payment processing records and the commencement of targeted forensic accounting on
8 critical bank records, to identify key transactions and bank accounts not previously known.
9 Given the identification and expansion of receivership estate entities, the Receiver and her
10 team prepared and conferred with the Commission to determine an agreed upon and
11 appropriate scope for a forensic analysis, a report on which the Receiver is anticipating
12 filing in the near term. Such analysis commenced during the Application Period.

13 Due to the identified scope of the scheme, the number of affiliated entities and bank
14 accounts used, and the critical nature of bank record review completed thus far, the
15 Receiver is using a project-specific and cost-effective AI software to upload the thousands
16 of banking transactions, a task that, if done manually, would take hundreds of hours and
17 months to complete. This software saves substantial time and expense and shortens the
18 period of time required to complete the accounting.

19 Forensic accounting is a critical tool in these types of receiverships, but particularly
20 in this case as it assisted with the identification of a larger enterprise, leading to additional
21 recoveries and identification of potential recoveries (and amounts received by the
22 individual defendants in the case) as well as determination of an approximate net harm
23 amount. The reasonable and necessary fees for Receiver's work in this category total
24 \$7,731.00.

25 **B. Summary of Expenses Requested for Reimbursement**

26 The Receiver requests that the Court approve reimbursement of \$42,647.55 in out-
27 of-pocket costs. The itemization of such expenses is summarized below by billing
28 category.

Category	Total
Project-Specific Forensic Accounting Software ³	\$12,500.00
Forensic IT Third-Party Vendor ⁴	\$26,474.12
Website, Phone and Other IT	\$1,957.36
Copies & Postage	\$159.99
Travel (Hotel and Meals for Office Cleanout)	\$1,556.08
Total Costs	\$42,647.55

III. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE ALLOWED

“As a general rule, the expenses and fees of a receivership are a charge upon the property administered.” *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994). These expenses include the fees and expenses of this Receiver and her professionals, including Allen Matkins. Decisions regarding the timing and amount of an award of fees and costs to the Receiver and her professionals are committed to the sound discretion of the Court. *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992) (rev’d in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).

In allowing fees, a court should consider “the time, labor and skill required, but not necessarily that actually expended, in the proper performance of the duties imposed by the court upon the receiver . . . , the fair value of such time, labor and skill measured by conservative business standards, the degree of activity, integrity and dispatch with which the work is conducted and the result obtained.” *United States v. Code Prods. Corp.*, 362 F.2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted). In practical terms, receiver and professional compensation thus ultimately rests upon the result of an equitable, multi-

³ The Receiver is billing the second half of the expense of the use of this cost-saving software.

⁴ As noted in the prior Fee Application, only the data collection and preservation work completed through November 2024 was previously billed and the Receiver anticipated an additional invoice of approximately \$22,000 for just the month of December 2024. The \$26,474.12 being billed reflects time incurred through March 2025.

1 factor balancing test involving the “economy of administration, the burden that the estate
2 may be able to bear, the amount of time required, although not necessarily expended, and
3 the overall value of the services to the estate.” *In re Imperial 400 Nat’l, Inc.*, 432 F.2d
4 232, 237 (3d Cir. 1970). Regardless of how this balancing test is formulated, no single
5 factor is determinative and “a reasonable fee is based [upon] all circumstances surrounding
6 the receivership.” *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F. Supp.
7 465, 480 (S.D. Tex. 1974).

8 As a preliminary matter, the Appointment Order confer on the Receiver substantial
9 duties and powers, including to conduct such investigation and discovery as may be
10 necessary to locate and account for all receivership assets, to take such action as is
11 necessary and appropriate to assume control over and preserve receivership assets, and to
12 employ attorneys and others to investigate and, where appropriate, institute, pursue, and
13 prosecute all claims and causes of action of whatever kind and nature. *See* Ex Parte TRO,
14 Section XII, Dkt. 9. As previously noted, the Receiver promptly determined that utilizing
15 a few third-party vendors and her experienced staff at E3 as well as experienced, qualified
16 counsel was critical due to the lack of records, size and complexity of the receivership
17 estate.

18 The Receiver has submitted a detailed fee application which describes the nature of
19 the services rendered, and the identity and billing rate of each individual performing each
20 task. *See* **Exhibit A**. The Receiver endeavors to staff matters as efficiently as possible,
21 while remaining cognizant of the complexity of issues presented. The request for fees is
22 based on the Receiver's customary billing rates charged for comparable services provided
23 in other matters, less a 10% discount.

24 The work performed by the Receiver and her team was essential to carrying out the
25 Receiver's Court-ordered duties. The Receiver and her counsel have worked diligently
26 since the Receiver's appointment to identify, preserve and protect the assets of the
27 receivership estate and carry out the Receiver's other duties pursuant to the Appointment
28 Orders. Moreover, the Receiver seeks payment of only 80% of fees incurred on an interim

1 basis in recognition of the fact that her work is ongoing. Payment of the proposed 20%
2 holdback will be sought at the conclusion of the receivership. The Receiver's fees are fair
3 and reasonable and should be approved and paid on an interim basis.

4 **IV. CONCLUSION**

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

- 6 1. Approving the Receiver's fees of \$68,324.65;
7 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
8 \$54,659.72, from the assets of the Receivership Entities;
9 3. Approving the Receiver's costs in the amount of \$42,647.55, and authorizing
10 and directing the Receiver to reimburse such costs in full; and
11 4. For such other and further relief as the Court deems appropriate.

12
13 Dated: September 10, 2025

By: 
KRISTA L. FREITAG
Court-appointed Receiver

CERTIFICATE OF SERVICE

I am employed in the County of San Diego, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is One America Plaza, 600 West Broadway, 27th Floor, San Diego, California 92101-0903.

On September 10, 2025, I used the United States District Court, District of Nevada's Electronic Case Filing System, with the ECF registered to Edward G. Fates to file the following document(s):

**SECOND INTERIM FEE APPLICATION OF KRISTA L. FREITAG,
COURT-APPOINTED RECEIVER, FOR PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES**

The ECF system is designed to send an e-mail message to all parties in the case, which constitutes service. The parties served by e-mail in this case are found on the Court's Electronic Mail Notice List.

- **Luis H Gallegos**
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- **Paul Rowland Graff**
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alb@semenzarickard.com
- **Reid Abram Tepfer**
rtepfers@ftc.gov

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

Executed on September 10, 2025, at San Diego, California.

/s/ Pamela Tei Lewis

Pamela Tei Lewis

EXHIBIT INDEX

EXHIBIT	DESCRIPTION	PAGE NOS.
Exhibit A	Receiver's Billing Entries	14-28

EXHIBIT A

Receiver's Billing Entries



E3 Realty Advisors
501 W Broadway Ste 290
San Diego, CA 92101

Contact: Freitag, Krista

September 09, 2025

Invoice Number: 165

Invoice Period: 01-01-2025 - 03-31-2025

Fees	68,324.65
Expenses	42,647.55
Total for this Invoice	110,972.20

E3 Realty Advisors
 501 W Broadway Ste 290
 San Diego, CA 92101
 619-567-7223
 www.ethreadvisors.com

September 09, 2025

Invoice Number: 165

Invoice Period: 01-01-2025 - 03-31-2025

Payment Terms: Upon Court Approval

RE: 513 - Superior Servicing

Time Details

Date	Professional	Description	Hours	Rate	Amount
<u>Superior Servicing - 001 Tax</u>					
01-14-2025	L. Ryan	Conferred with tax accountant Yeager re year end. (.4)	0.40	292.50	117.00
01-22-2025	L. Ryan	Drafted email to Yeager. (.4)	0.40	292.50	117.00
01-23-2025	K. Freitag	Reviewed, prepared and sent tax return proposal for approval. (.5)	0.50	405.00	202.50
01-31-2025	A. Herren	Scanned and mailed tax forms; corresponded with L. Ryan re: same. (.3)	0.30	112.50	33.75
02-05-2025	L. Ryan	Corresponded re tax accountant agreement and state FTB schedule. (.5)	0.50	292.50	146.25
02-06-2025	G. Rodriguez	Various follow up with E. Caldwell, Atty Fates and CPA re: personal tax returns. (.5)	0.50	337.50	168.75
02-07-2025	G. Rodriguez	Various follow up with Defendant Caldwell and CPA Yeager re: Caldwell personal tax returns. (.5)	0.50	337.50	168.75
02-12-2025	L. Ryan	Followed up on agreement with tax accountant. (.1)	0.10	292.50	29.25
02-14-2025	L. Ryan	Corresponded with T. Fates re tax accountant agreement. (.2)	0.20	292.50	58.50
02-18-2025	L. Ryan	Responded re tax accountant agreement. (.2)	0.20	292.50	58.50
02-25-2025	K. Freitag	Reviewed and provided comments to accounting engagement. (.3)	0.30	405.00	121.50
02-26-2025	L. Ryan	Revised and sent agreement to Yeager. (.8)	0.80	292.50	234.00
02-28-2025	L. Ryan	Revised and corresponded re Yeager agreement and emailed with Brenda re docs. (1.0)	1.00	292.50	292.50
03-04-2025	L. Ryan	Gathered and saved down bank statements requested for 2024 tax work. (2.5)	2.50	292.50	731.25
03-05-2025	L. Ryan	Corresponded with B. Chavero and uploaded requested documents for tax work. (1.0)	1.00	292.50	292.50
03-17-2025	L. Ryan	Responded to B. Chavero and researched transactions, QuickBooks files and payments for tax prep. (1.5)	1.50	292.50	438.75
03-18-2025	L. Ryan	Corresponded with B. Chevero re QuickBooks subscriptions and researched same. (.6)	0.60	292.50	175.50
			11.30		3,386.25
<u>Superior Servicing - 002 General Receivership</u>					
01-06-2025	K. Freitag	Conferred with Atty Fates re: next steps. (.2)	0.20	405.00	81.00
01-07-2025	K. Freitag	Attended call with counsel and FTC re: case update. (.5) Conferred with Atty O'Gorman re: banking and accounting records. (.4)	0.90	405.00	364.50
01-08-2025	K. Freitag	Reviewed updated subpoena list. (.4) Reviewed and communicated re: IT vendor challenges in getting access to company domains and records. (.2)	0.60	405.00	243.00

Invoice Number: 165

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Exhibit A, Page 16

Date	Professional	Description	Hours	Rate	Amount
<u>Superior Servicing - 002 General Receivership</u>					
01-08-2025	G. Rodriguez	Compiled information requested by Atty Pham responsive to the GoDaddy request and discussion with same re Slack demand and status updated on landlord requests. (1.5)	1.50	337.50	506.25
01-10-2025	G. Rodriguez	Additional follow up with vendor on information requests related to payment processing and followed up with Atty Pham re GoDaddy information. (.3)	0.30	337.50	101.25
01-13-2025	G. Rodriguez	Various follow up with Atty Fates and L. Ryan re information responses from various vendors, noticed vendor (Array.com) re PI Order and coordinated call with same. (1.3)	1.30	337.50	438.75
01-14-2025	G. Rodriguez	Followed up with K. Freitag and Atty Fates re landlord requests, discussion with L. Ryan and K. Freitag re notices to newly discovered vendors and provided updates re same. (.7)	0.70	337.50	236.25
01-14-2025	K. Freitag	Conferred with G. Rodriguez re: notices to newly discovered vendors and update re same. (.2)	0.20	405.00	81.00
01-14-2025	L. Ryan	Conferred with G. Rodriguez re: notices to newly discovered vendors and update re same. (.2)	0.20	292.50	58.50
01-15-2025	G. Rodriguez	Discussion with vendor re services provided, requested information and prepared memo to K. Freitag and Atty Fates re same and followed up with Atty Pham re GoDaddy, Slack and FreeVoice service. (1.8)	1.80	337.50	607.50
01-16-2025	G. Rodriguez	Followed up with vendor re plans for software, reviewed materials for same, update with Atty Pham and updated with forensic IT specialist re data available. (.8)	0.80	337.50	270.00
01-16-2025	K. Freitag	Attended call with FTC and Atty Fates re: records, next steps. (.3) Sent email to IT professionals re: data needed for encrypted drive inquiry. (.2)	0.50	405.00	202.50
01-21-2025	G. Rodriguez	Updated on case status; corresponded with K. Freitag re: demand for IT information turnover and discussion with landlords regarding plans for landlords. (.8)	0.80	337.50	270.00
01-22-2025	K. Freitag	Coordinated posting of fee apps to website. (.1)	0.10	405.00	40.50
01-22-2025	G. Rodriguez	Updates on forensic IT data collections and revisions to draft email to Defendants demanding turnover of IT assets. (.6)	0.60	337.50	202.50
01-23-2025	K. Freitag	Prepared and sent cooperation request email to D. Hernandez and E. Caldwell. (.5)	0.50	405.00	202.50
01-24-2025	K. Freitag	Coordinated IT production to commission, as requested. (.2) Conferred with counsel re: Gold West request. (.1)	0.30	405.00	121.50
01-27-2025	G. Rodriguez	Reviewed and tested access to SPC and SPC2 accounts, coordinated renewal of various accounts and coordinated renewal of access to accounts with forensic IT and prepared update for K. Freitag re: same. (4.0)	4.00	337.50	1,350.00
01-27-2025	K. Freitag	Conferred with G. Rodriguez re: SPC and SPCTWO domains; coordinated access and reviewed global update on Go Daddy. (.4)	0.40	405.00	162.00
01-28-2025	K. Freitag	Conferred with counsel re: additional access needed for domains. (.2)	0.20	405.00	81.00
01-28-2025	G. Rodriguez	Coordinated review of GoDaddy accounts with forensic IT, forwarding of same accounts with webmaster and updated Atty Pham and K. Freitag (various) re: progress on same. (1.5)	1.50	337.50	506.25
01-29-2025	G. Rodriguez	Coordinated takeover of three domain accounts, changed credentials and inventoried same. (2.0)	2.00	337.50	675.00

Date	Professional	Description	Hours	Rate	Amount
<u>Superior Servicing - 002 General Receivership</u>					
01-29-2025	K. Freitag	Conferred with G. Rodriguez re: Sunrise, Superior and Accredited domains. (.4)	0.40	405.00	162.00
01-31-2025	G. Rodriguez	Continued work gaining control of three domains and corresponded with Atty Pham re: turnover of accounts. (1.0)	1.00	337.50	337.50
02-03-2025	G. Rodriguez	Followed up with Atty Pham re: information missing/needed from Go-Daddy. (1.0) Continued work securing accounts and restoring deleted email accounts. (.7)	1.70	337.50	573.75
02-04-2025	G. Rodriguez	Update with Atty Pham re: GoDaddy and Slack. (.2)	0.20	337.50	67.50
02-05-2025	G. Rodriguez	Discussion with Atty Fates re: process for takeover of Slack accounts, discussions (various) with E. Caldwell and D. Merdjanian and followed up with K. Freitag re: same. (1.5)	1.50	337.50	506.25
02-06-2025	G. Rodriguez	Followed up with D. Merdjanian and Atty Fates re: access to Slack data. (.3)	0.30	337.50	101.25
02-10-2025	G. Rodriguez	Renewed email accounts for Sunrise Solutions at Go-Daddy. (0.5)	0.50	337.50	168.75
02-18-2025	G. Rodriguez	Updated domain services and follow up with Atty Pham re: redirecting websites. (.5)	0.50	337.50	168.75
02-24-2025	G. Rodriguez	Worked with webmaster re: forwarding websites to receivership website and discussion with Atty Pham re: same. (1.5)	1.50	337.50	506.25
02-25-2025	G. Rodriguez	Continued work to control GoDaddy domains, including work with webmaster re: changes to landing pages and discussion with Atty Pham re: control over account. (4.0)	4.00	337.50	1,350.00
02-26-2025	G. Rodriguez	Forwarded defendant emails to newly created email account to monitor same. (4.0)	4.00	337.50	1,350.00
02-27-2025	E. Hughes	Uploaded data from D. Merdjanian flash drive and corresponded with K. Freitag re: same. (.4)	0.40	112.50	45.00
02-27-2025	G. Rodriguez	Continued work to transition websites to Receiver's control, including coordination with webmaster and Atty Pham. (1.0) Continued work to control defendant email addresses and requested proposal for cost in imaging the same. (.7)	1.70	337.50	573.75
02-28-2025	G. Rodriguez	Discussion with forensic IT re: email collection and correspondence with K. Freitag re: same. (.5)	0.50	337.50	168.75
03-06-2025	K. Freitag	Attended call with commission. (.5) Conferred with counsel re: same. (.1) Attended call with counsel and G. Rodriguez re: Go Daddy, Microsoft, etc. status. (1.0)	1.60	405.00	648.00
03-06-2025	G. Rodriguez	Prepared memo to Atty Pham re: Go Daddy domains and coordinated same meeting. (1.0) Discussion with Atty Fates, Kebeh and K. Freitag re: Slack data, researched company files for the same and updated Authorization Agreement with same. (1.0) Various discussion with Atty Pham re: information requests and follow up re: CRM questions. (.5)	2.50	337.50	843.75
03-07-2025	G. Rodriguez	Discussion with Attys Fates and Pham and K. Freitag re: status of Go Daddy and Microsoft responses to preservation letters. (1.0)	1.00	337.50	337.50
03-07-2025	K. Freitag	Attended follow-up call with counsel and G. Rodriguez re: Go Daddy, Microsoft, etc. status. (1.0)	1.00	405.00	405.00
03-10-2025	G. Rodriguez	Reviewed domain accounts to confirm renewals and provided Atty Fates requested information re: Slack account. (1.0)	1.00	337.50	337.50
03-11-2025	G. Rodriguez	Reviewed and further organized GoDaddy accounts in response to account expiration notice. (.8)	0.80	337.50	270.00
03-13-2025	G. Rodriguez	Coordinated download of Slack files and reviewed	0.80	337.50	270.00

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Date	Professional	Description	Hours	Rate	Amount
<u>Superior Servicing - 002 General Receivership</u>					
		same. (.8)			
03-14-2025	G. Rodriguez	General follow up with Atty Fates, Atty Pham and K. Freitag re: various open matters including RedStone, Forth CRM and Slack. (1.2)	1.20	337.50	405.00
03-17-2025	G. Rodriguez	Update with Atty Pham re: various open matters with tech companies. (.2)	0.20	337.50	67.50
03-18-2025	G. Rodriguez	Took possession of Slack accounts under the direction of Slack legal counsel. (.7)	0.70	337.50	236.25
03-19-2025	G. Rodriguez	Confirmed possession of all Slack accounts and began reviewed of data and discussion with Atty Fates and K. Freitag re: same. (2.0)	2.00	337.50	675.00
03-19-2025	K. Freitag	Met with team re: Slack data. (.5)	0.50	405.00	202.50
03-20-2025	G. Rodriguez	Provided update to K. Freitag re: Redstone production data, and correspondence with Atty Pham re: open subpoena matters with various tech sources. (1.5)	1.50	337.50	506.25
03-25-2025	G. Rodriguez	Reviewed renewals for domains and confirmed same. (.5)	0.50	337.50	168.75
03-26-2025	K. Freitag	Followed up on outstanding items; conferred with FTC re: same. (.4)	0.40	405.00	162.00
			53.30		18,416.25
<u>Superior Servicing - 003 Asset Investigation & Recovery</u>					
01-06-2025	K. Freitag	Worked on Banner Bank documents requested; conferred with them re: same. (1.1)	1.10	405.00	445.50
01-07-2025	K. Freitag	Conferred with Banner Bank re: transition documents. (.2)	0.20	405.00	81.00
01-09-2025	K. Freitag	Met at Banner Bank branch for sig cards, closeout, safe deposit box authorization, cashier's check retrieval. (.9)	0.90	405.00	364.50
01-15-2025	L. Ryan	Revised bank letter. (.3)	0.30	292.50	87.75
01-27-2025	L. Ryan	Updated list re Banner safe deposit box notice. (.2)	0.20	292.50	58.50
02-12-2025	G. Rodriguez	Coordinated Accredi LLC insurance policy, including creation of online account, downloaded and reviewed policy and payment documents, discussion with Atty Fates and K. Freitag (various) re: employee dishonesty policy claim. (3.0)	3.00	337.50	1,012.50
02-25-2025	G. Rodriguez	Reviewed insurance claim letter prepared by Atty Fates. (.2)	0.20	337.50	67.50
02-26-2025	K. Freitag	Reviewed insurance letter re: employee dishonesty claim on two entities. (.2)	0.20	405.00	81.00
03-04-2025	G. Rodriguez	Update on status of insurance claim. (.1)	0.10	337.50	33.75
03-17-2025	G. Rodriguez	Reviewed insurance policy and discussions with K. Freitag re: cancellation of policy. (1.0)	1.00	337.50	337.50
03-24-2025	G. Rodriguez	Update from Hartford re: insurance claim submitted. (.2)	0.20	337.50	67.50
03-25-2025	G. Rodriguez	Followed up with Hartford re: insurance for asset and cancelled accounts for same. (.5)	0.50	337.50	168.75
			7.90		2,805.75
<u>Superior Servicing - 003 Travel to Property</u>					
01-10-2025	A. Juroe	Traveled to/from Saturn and Imperial offices to meet employees. (1.3)	1.30	146.25	190.13
01-17-2025	A. Juroe	Traveled to/from Imperial Office. (1.3)	1.30	146.25	190.13
01-29-2025	E. Hughes	Traveled from San Diego to Saturn and Imperial offices. (2.5)	2.50	56.25	140.63
01-29-2025	A. Herren	Traveled from San Diego, CA to Saturn and Imperial offices in Brea, CA. (2.3)	2.30	56.25	129.38
01-30-2025	A. Herren	Traveled from Saturn/Imperial offices in Brea, CA to	2.00	56.25	112.50

Date	Professional	Description	Hours	Rate	Amount
<u>Superior Servicing - 003 Travel to Property</u>					
		San Diego, CA. (2.0)			
01-31-2025	E. Hughes	Traveled from Saturn and Imperial offices to San Diego. (3.2)	3.20	56.25	180.00
02-24-2025	E. Hughes	Travel from San Diego to Brea offices. (2.2) Corresponded with Sparkletts re: water pickup at Imperial and Saturn offices. (.2)	2.40	56.25	135.00
02-24-2025	A. Herren	Traveled to Saturn office Brea, CA. (2.3)	2.30	56.25	129.38
02-25-2025	A. Herren	Traveled from Saturn office in Brea, CA. (2.0)	2.00	56.25	112.50
02-25-2025	E. Hughes	Travel from Brea offices to San Diego. (3.2)	3.20	56.25	180.00
			22.50		1,499.65
<u>Superior Servicing - 004 Reporting</u>					
01-06-2025	L. Ryan	Began receipts and disbursement report to track takeover amounts. (1.0)	1.00	292.50	292.50
01-14-2025	L. Ryan	Worked on receipts and disbursement report. (4.3)	4.30	292.50	1,257.75
01-15-2025	K. Freitag	Reviewed (1.2) and discussed receipts and disbursements analysis with L. Ryan through 12/31/24. (.3)	1.50	405.00	607.50
01-15-2025	L. Ryan	Continued to work on receipts and disbursement report. (2.8) Conferred with K. Freitag re reporting through 12/31/24. (.3)	3.10	292.50	906.75
02-05-2025	G. Rodriguez	Worked on quarterly report. (2.0)	2.00	337.50	675.00
02-06-2025	G. Rodriguez	Worked on quarterly report. (1.8)	1.80	337.50	607.50
02-07-2025	G. Rodriguez	Continued work on quarterly report. (1.5)	1.50	337.50	506.25
03-18-2025	K. Freitag	Worked on Second Interim Report in anticipation of filing quarterly report ending 3/31/25. (2.3)	2.30	405.00	931.50
03-21-2025	G. Rodriguez	Worked on Receiver's Report. (3.0)	3.00	337.50	1,012.50
03-26-2025	G. Rodriguez	Continued work on Receiver Report. (1.0)	1.00	337.50	337.50
			21.50		7,134.75
<u>Superior Servicing - 005 Operations & Asset Sales</u>					
01-03-2025	A. Herren	Recorded, scanned and deposited multiple bank fund checks; corresponded re: same. (1.3)	1.30	112.50	146.25
01-06-2025	A. Herren	Recorded and scanned bank fund check; corresponded re: same. (.2) Recorded NSF notices; corresponded with L. Ryan re: same. (.2)	0.40	112.50	45.00
01-06-2025	K. Freitag	Reviewed and approved ADP 2024 payments; corresponded with A. Juroe re: employee meetings. (.2) Conferred with G. Rodriguez re: status of investigations. (.2)	0.40	405.00	162.00
01-06-2025	G. Rodriguez	Followed up with vendors re status of investigations, reviewed notes on collection of data, brief discussion with K. Freitag re status update, followed up on vendor payments for insurance and other services. (1.0)	1.00	337.50	337.50
01-06-2025	A. Juroe	Corresponded with K. Freitag re employee meetings. (.2)	0.20	292.50	58.50
01-06-2025	L. Ryan	Initiated wire. (.1) Reviewed ADP reports. (.8) Corresponded with A. Herren re deposits. (.2) Corresponded re insurance payment. (.1)	1.20	292.50	351.00
01-07-2025	A. Herren	Setup autopay for insurance; corresponded with G. Rodriguez and L. Ryan re same. (.2) Created vendor autopay/login tracking sheet; corresponded with L. Ryan re: same. (.3)	0.50	112.50	56.25
01-07-2025	G. Rodriguez	Conferred with accounting re invoices to be paid and discussion with Atty Pham re status of GoDaddy discussions and prepared schedules as requested. (.8)	0.80	337.50	270.00
01-07-2025	L. Ryan	Corresponded various times re payables. (.6)	0.60	292.50	175.50
01-08-2025	L. Ryan	Conferred with ADP and updated schedule. (.4)	0.40	292.50	117.00

Date	Professional	Description	Hours	Rate	Amount
<u>Superior Servicing - 005 Operations & Asset Sales</u>					
01-08-2025	A. Herren	Corresponded with L. Ryan and E. Hughes re delivery of ADP employee tax forms. (.1) Recorded and scanned bank NSF charge notices and bank legal response letters; corresponded with L. Ryan re same. (.8)	0.90	112.50	101.25
01-08-2025	K. Freitag	Conferred with A. Juroe re: employee status. (.3)	0.30	405.00	121.50
01-08-2025	A. Juroe	Conferred with K. Freitag re meeting with employees, case status, etc. (.3)	0.30	292.50	87.75
01-09-2025	E. Hughes	Researched office inventory disposition and storage options and corresponded with K. Freitag re: same. (.9)	0.90	112.50	101.25
01-09-2025	G. Rodriguez	Followed up with vendor re information requests on banking deposits. (.2)	0.20	337.50	67.50
01-09-2025	L. Ryan	Accessed and reviewed multiple online QB subscriptions from tax accountant. (1.2)	1.20	292.50	351.00
01-09-2025	K. Freitag	Conferred with team re: employee pickups, office cleanout, etc. (.2)	0.20	405.00	81.00
01-09-2025	A. Herren	Sent text to employees re: picking up belongings; corresponded with K. Freitag and A. Juroe re: same; downloaded employee responses re: same. (1.3)	1.30	112.50	146.25
01-10-2025	A. Juroe	Met employees at offices for retrieval of personal items. (1.2)	1.20	292.50	351.00
01-10-2025	A. Herren	Corresponded with employees re: pickup of belongings; corresponded with A. Juroe re same. (.2) Updated employee contact list; corresponded with A. Juroe re same. (.2) Recorded and scanned bank fund check. (.2) Deposited bank fund check. (.4)	1.00	112.50	112.50
01-13-2025	E. Hughes	Conferred with office liquidation company and researched further office inventory disposition options. (.2)	0.20	112.50	22.50
01-13-2025	A. Herren	Corresponded with Accredited employees re picking up belongings; recorded and corresponded with K. Freitag and A. Juroe re same. (.4) Conferred with L. Ryan re bank deposit. (.1) Processed forwarded mail. (.2)	0.70	112.50	78.75
01-13-2025	L. Ryan	Corresponded with G. Rodriguez re merchant. (.2) Corresponded with A. Herren re W2s. (.2) Corresponded with bank re approval to deposit checks and forwarded support. (.4)	0.80	292.50	234.00
01-13-2025	A. Juroe	Corresponded with K. Freitag and A. Herren to coordinate employee meeting. (.2)	0.20	292.50	58.50
01-14-2025	E. Hughes	Scanned, filed and logged Chase Bank NSF notices. (.3) Corresponded with auction company and property management companies re: office disposition options. (.4)	0.70	112.50	78.75
01-14-2025	A. Herren	Recorded and scanned bank NSF charge notices and bank legal response letters; corresponded with L. Ryan re same. (1.0) Researched insurance payment status. (.1)	1.10	112.50	123.75
01-15-2025	A. Herren	Corresponded with K. Freitag re: employee responses for picking up belongings, downloaded same. (.2) Corresponded with G. Rodriguez re: insurance payment status; setup autopay for same. (.4)	0.60	112.50	67.50
01-15-2025	E. Hughes	Corresponded with Imperial property management and K. Freitag re: office disposition options. (.3)	0.30	112.50	33.75
01-16-2025	L. Ryan	Downloaded docs from tax accountant Yeager and update schedule. (3.2)	3.20	292.50	936.00
01-16-2025	A. Juroe	Conferred with K. Freitag re: office visit to meet with employees. (.1) Messaged with A. Herren re: same. (.1)	0.20	292.50	58.50

Date	Professional	Description	Hours	Rate	Amount
<u>Superior Servicing - 005 Operations & Asset Sales</u>					
01-16-2025	A. Herren	Followed up with employees re: pickup of belongings; corresponded with K. Freitag and A. Juroe re: same. (.4)	0.40	112.50	45.00
01-16-2025	K. Freitag	Conferred with A. Juroe re: employee access. (.1)	0.10	405.00	40.50
01-17-2025	A. Herren	Corresponded with employees re: pickup of belongings; corresponded with A. Juroe re: same; updated employee contact list. (.6)	0.60	112.50	67.50
01-17-2025	L. Ryan	Reviewed ADP packages and W2 forms; downloaded Q4 reports and emailed ADP re missing forms. (2.4)	2.40	292.50	702.00
01-17-2025	A. Juroe	Met employees onsite to retrieve personal items.(1.4)	1.40	292.50	409.50
01-20-2025	L. Ryan	Conferred with ADP. (.1)	0.10	292.50	29.25
01-21-2025	L. Ryan	Attended call with team (.6) Prepared W2s for DM Financials and researched Q4 tax form, reconciled to bank activity. (1.5)	2.10	292.50	614.25
01-21-2025	A. Juroe	Attended case status call with team. (.6)	0.60	292.50	175.50
01-21-2025	E. Hughes	Attended all team meeting re: general update. (.6) Scanned and logged NSF notices. (.3) Scanned and logged employee-related notices. (.5) Conferred with A. Herren re moveout of Saturn/Imperial offices. (.2)	1.60	112.50	180.00
01-21-2025	A. Herren	Attended team call re: project status. (.6) Updated employee list. (.4) Reviewed, recorded and scanned Chase Bank NSF notices. (.5) Conferred with E. Hughes re: closeout of Imperial and Saturn offices. (.2)	1.70	112.50	191.25
01-21-2025	K. Freitag	Attended all hands call with team. (.6)	0.60	405.00	243.00
01-21-2025	T. Hebrank	Team status conference call. (.6)	0.60	405.00	243.00
01-22-2025	K. Freitag	Reviewed and conveyed guidance on accountant proposal pending approval (.5) Conferred with Atty Fates re: same. (.2) Reviewed IT imaging content/ conveyed same, reviewed/revised proposal to tax accountant and uploaded bank list. (.9)	1.60	405.00	648.00
01-22-2025	A. Herren	Corresponded with E. Hughes re: supplies for Saturn and Imperial office move out. (.2) Corresponded with L. Ryan re: change of registered agent. (.1)	0.30	112.50	33.75
01-22-2025	E. Hughes	Conferred with moving company for office inventory move and corresponded with K. Freitag re: same. (.3) Secured storage facility for office inventory and conferred with L. Ryan re: same. (.4) Corresponded with A. Herren re: office inventory move logistics and supply order. (.2)	0.90	112.50	101.25
01-22-2025	L. Ryan	Conferred with K. Freitag re reg agent and bank list and corresponded with A. Herren re same. (.5)	0.50	292.50	146.25
01-23-2025	E. Hughes	Secured office inventory moving company and corresponded with K. Freitag re: same. (.2) Placed packing supply order and corresponded with L. Ryan and A. Herren re: same. (.1) Conferred with auction company re: office inventory and corresponded with G. Rodriguez re: same. (.3) Scanned and logged employee-related notices. (.2) Met with A. Herren re: Saturn/Imperial office move out. (.4)	1.20	112.50	135.00
01-23-2025	G. Rodriguez	Further updated with landlord and corresponded with E. Hughes re: potential contact to remove office furniture. (.2)	0.20	337.50	67.50
01-23-2025	A. Herren	Corresponded with E. Hughes and L. Ryan re: supplies for Saturn/Imperial office move out. (.2) Met with E. Hughes re: office move out. (.4)	0.60	112.50	67.50
01-24-2025	A. Herren	Assisted L. Ryan mailing employee W-2 forms. (.2)	0.20	112.50	22.50
01-24-2025	L. Ryan	Mailed W2s to recipients. (.5)	0.50	292.50	146.25
01-27-2025	L. Ryan	Conferred with G. Rodriguez to renew GoDaddy. (.6)	0.60	292.50	175.50

Date	Professional	Description	Hours	Rate	Amount
<u>Superior Servicing - 005 Operations & Asset Sales</u>					
01-27-2025	A. Herren	Reviewed and scanned Banner Bank response letter; corresponded with K. Freitag and L. Ryan re same. (.1)	0.10	112.50	11.25
01-29-2025	E. Hughes	Created office file recording logs. (.4) Prepared office for movers. (6.5)	6.90	112.50	776.25
01-29-2025	A. Herren	Took inventory and prepared Saturn/Imperial offices for move out. (6.0)	6.00	112.50	675.00
01-29-2025	K. Freitag	Conferred with team re: office cleanout/move. (.2)	0.20	405.00	81.00
01-30-2025	K. Freitag	Reviewed and conferred with E. Hughes and A. Herren re: office preparation. (.3)	0.30	405.00	121.50
01-30-2025	L. Ryan	Prepared Q4 payroll reports and uploaded W2s for DM Financial. (1.5)	1.50	292.50	438.75
01-30-2025	A. Herren	Continued preparing Saturn/Imperial offices for move out; conferred with K. Freitag and E. Hughes re: same. (8.5)	8.50	112.50	956.25
01-30-2025	E. Hughes	Prepared office for movers. (9.5)	9.50	112.50	1,068.75
01-31-2025	E. Hughes	Prepared office for movers. (5.0) Conferred with K. Freitag and A. Herren re: office move update. (.3)	5.30	112.50	596.25
01-31-2025	L. Ryan	Reviewed and uploaded 1099s. (.6) Researched Q4 payroll tax form mailing address, correspond re same. (.4) Conferred with A. Herren re tax forms and boxing up office. (.4)	1.40	292.50	409.50
01-31-2025	A. Herren	Corresponded with employee re: payroll; corresponded with K. Freitag and L. Ryan re: same. (.2) Scanned and forwarded vendor invoice. (.1) Updated vendor contact list. (.1)	0.40	112.50	45.00
02-03-2025	G. Rodriguez	Coordinated delay of key change with landlord with team (.3)	0.30	337.50	101.25
02-03-2025	A. Juroe	Reviewed and responded to messages from G. Rodriguez and E. Hughes re: landlord re-key; conferred with K. Freitag re: same. (.2) Received FedEx for landlord and dropped key at FedEx. (.4)	0.60	292.50	175.50
02-03-2025	E. Hughes	Corresponded with L. Ryan and A. Herren re: Sparkletts and Spectrum office accounts. (.1) Corresponded with A. Juroe re: Postal Annex. (.1) Reviewed office inventory chain of custody documentation and conferred with A. Herren re: same (.4) Corresponded with G. Rodriguez and A. Juroe re: Saturn office keys. (.1)	0.70	112.50	78.75
02-03-2025	A. Herren	Prepared chain of custody forms and lists; conferred with E. Hughes and corresponded with K. Freitag re same. (1.5)	1.50	112.50	168.75
02-04-2025	E. Hughes	Corresponded with K. Freitag re: office move and inventory chain of custody process. (.1) Corresponded with G. Rodriguez re: office moving company contract. (.2) Scanned and logged bank NSF notices (.1) Corresponded with office moving company. (.2)	0.60	112.50	67.50
02-04-2025	G. Rodriguez	Prepared contract for moving company, coordinated reviewed by Atty Fates and provided guidance to E. Hughes re: same. (3.0) Updated from landlord re: access to space and coordinated same with K. Freitag. (.3)	3.30	337.50	1,113.75
02-04-2025	A. Herren	Corresponded with employee re: payroll question; corresponded with K. Freitag re: same. (.2)	0.20	225.00	45.00
02-05-2025	A. Herren	Reviewed and forwarded correspondence re: domain billing. (.1) Submitted change of registered agent for multiple entities; corresponded with L. Ryan and Paracorp re: same; updated sheet re: same. (1.0)	1.10	112.50	123.75
02-05-2025	L. Ryan	Corresponded re accounts payable. (.1)	0.10	292.50	29.25
02-05-2025	E. Hughes	Corresponded with G. Rodriguez and Pro Smart	0.40	112.50	45.00

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Date	Professional	Description	Hours	Rate	Amount
<u>Superior Servicing - 005 Operations & Asset Sales</u>					
02-06-2025	E. Hughes	Moving re: office moving company contract. (.4) Corresponded with G. Rodriguez, A. Herren, and Pro Smart Moving re: office moving company contract. (.5) Scanned and logged bank NSF notices (.3)	0.80	112.50	90.00
02-06-2025	G. Rodriguez	Reviewed updated moving contract and suggested additional revision for same. (.2)	0.20	337.50	67.50
02-06-2025	A. Herren	Recorded and scanned bank NSF charge notices and bank legal response letters; corresponded with L. Ryan re same. (.8)	0.80	112.50	90.00
02-07-2025	A. Herren	Recorded and scanned bank NSF charge notices. (.1)	0.10	112.50	11.25
02-07-2025	E. Hughes	Scanned, logged, and filed bank NSF notices (.2) Scanned and filed mail documents and corresponded with L. Ryan and A. Herren re: same. (.3) Filed employee-related documents. (.2)	0.70	112.50	78.75
02-10-2025	E. Hughes	Corresponded and conferred with Sparkletts and Spectrum re: Saturn Blvd and Imperial Hwy office accounts. (.5)	0.50	112.50	56.25
02-10-2025	A. Herren	Corresponded with employees re: returned W-2 forms. (.2)	0.20	112.50	22.50
02-11-2025	A. Herren	Reviewed and scanned insurance documents; corresponded with G. Rodriguez and L. Ryan re: same. (.4)	0.40	112.50	45.00
02-11-2025	L. Ryan	Corresponded re accounts payable. (.2)	0.20	292.50	58.50
02-11-2025	E. Hughes	Met with HKA for retrieval of T. Storey's computer equipment. (.8) Corresponded with Sparkletts re: Saturn Blvd and Imperial Hwy office accounts. (.2) Scanned, logged, and filed bank NSF notices (.4)	1.40	112.50	157.50
02-11-2025	G. Rodriguez	Reviewed new insurance policy, correspondence with Atty Fates and A. Herren re: payment for same. (1.0) Provided guidance to E. Hughes re: storage for equipment. (.2)	1.20	337.50	405.00
02-12-2025	E. Hughes	Corresponded with G. Rodriguez re: Saturn and Imperial office inventory and move logistics. (.1)	0.10	112.50	11.25
02-12-2025	L. Ryan	Complete NY workers comp form online. (.5) Corresponded with A. Herren and G. Rodriguez re insurance. (.2) Updated bank responses. (.4)	1.10	292.50	321.75
02-12-2025	A. Herren	Recorded and scanned bank NSF charge notices. (.5) Updated vendor list. (.1) Processed insurance payment; corresponded with G. Rodriguez and L. Ryan re: same. (.4)	1.00	112.50	112.50
02-13-2025	L. Ryan	Corresponded re accounts payable. (.3)	0.30	292.50	87.75
02-14-2025	T. Hebrank	Reviewed and signed check run. (.2)	0.20	405.00	81.00
02-14-2025	A. Herren	Processed check run; prepared and uploaded positive pay. (1.0)	1.00	112.50	112.50
02-17-2025	A. Herren	Mailed accounts payable checks. (.4)	0.40	112.50	45.00
02-17-2025	L. Ryan	Approved positive pay. (.2)	0.20	292.50	58.50
02-18-2025	L. Ryan	Conferred with K. Freitag re project update. (.6)	0.60	292.50	175.50
02-18-2025	A. Herren	Corresponded with Paracorp re: change of registered agent for multiple entities. (.4)	0.40	112.50	45.00
02-19-2025	E. Hughes	Corresponded with K. Freitag and Pro Smart re: office moving company contract. (.2) Scanned, logged and filed bank NSF notices. (.1)	0.30	112.50	33.75
02-20-2025	E. Hughes	Conferred with A. Herren re: office moving logistics. (.3) Corresponded with G. Rodriguez re: Saturn office furniture. (.1) Corresponded with Sparkletts re: Saturn and Imperial office accounts. (.1)	0.50	112.50	56.25
02-20-2025	G. Rodriguez	Researched past documents in preparation for making	3.00	337.50	1,012.50

Date	Professional	Description	Hours	Rate	Amount
<u>Superior Servicing - 005 Operations & Asset Sales</u>					
		claim on insurance. (1.5) Discussion with property manager re: furnishings and negotiated security deposit release in consultation with K. Freitag. (.7) Updated from team re: planned move-out, discussion with landlord re: same and began negotiations for security deposit return. (.8)			
02-20-2025	A. Herren	Updated chain of custody for Imperial and Saturn offices; corresponded with E. Hughes re same. (.4)	0.40	112.50	45.00
02-21-2025	L. Ryan	Corresponded with E. Hughes re water pick up. (.1)	0.10	292.50	29.25
02-21-2025	E. Hughes	Conferred and corresponded with Sparkletts re: Saturn and Imperial office account closures and property pickup. (.9) Corresponded with L. Ryan re: Sparklett Saturn and Imperial office account payments. (.1)	1.00	112.50	112.50
02-21-2025	G. Rodriguez	Discussion with Atty Fates and K. Freitag (various) re: furniture negotiations with landlord. (1.2)	1.20	337.50	405.00
02-24-2025	E. Hughes	Prepared Saturn and Imperial offices for movers. (7.0) Saturn and Imperial office inventory pick-up. (.2)	7.20	112.50	810.00
02-24-2025	A. Herren	Continued preparing the Imperial and Saturn offices for move out. (5.5) Corresponded with K. Freitag re: chain of custody forms. (.1)	5.60	112.50	630.00
02-25-2025	A. Herren	Confirmed and revised chain of custody for Imperial and Saturn offices. (.8) Continued preparing Imperial and Saturn offices for move out. (1.9) Oversaw move out of Imperial and Saturn offices. (7.3)	10.00	112.50	1,125.00
02-25-2025	E. Hughes	Prepared Saturn and Imperial offices for movers. (4.5) Oversaw Saturn and Imperial office moveout. (6.5) Scanned mail and corresponded with K. Freitag re: same. (.1) Corresponded with G. Rodriguez re: Saturn and Imperial office management communication. (.1)	11.20	112.50	1,260.00
02-25-2025	G. Rodriguez	Discussion with property manager re: status of move out for Saturn property. (.2)	0.20	337.50	67.50
02-26-2025	G. Rodriguez	Followed up with property managers for Imperial and Saturn re: release of premises and finalized negotiations on security deposit settlement. (.3)	0.30	337.50	101.25
02-26-2025	E. Hughes	Corresponded with L. Ryan re: office moving expense payment. (.1)	0.10	112.50	11.25
02-27-2025	A. Herren	Mailed storage keys to A. Juroe; corresponded re: same. (.2)	0.20	112.50	22.50
02-27-2025	G. Rodriguez	Followed up (various) with property managers re: access to premises and W-9. (.3)	0.30	337.50	101.25
02-28-2025	T. Hebrank	Reviewed and signed check run. (.1)	0.10	405.00	40.50
02-28-2025	L. Ryan	Approved positive pay. (.2)	0.20	292.50	58.50
02-28-2025	A. Herren	Processed check run; prepared and uploaded positive pay. (.5) Corresponded with A. Juroe re: storage key. (.1)	0.60	225.00	135.00
02-28-2025	E. Hughes	Saved down Saturn and Imperial office equipment chain of custody documents. (.1) Scanned, logged, and filed bank NSF notices (.4)	0.50	112.50	56.25
03-04-2025	A. Herren	Corresponded with E. Hughes re: Spectrum equipment. (.1)	0.10	112.50	11.25
03-04-2025	L. Ryan	Conferred with K. Freitag re servicer chargebacks. (.2)	0.20	292.50	58.50
03-04-2025	L. Ryan	Corresponded with A. Herren re invoice. (.2)	0.20	292.50	58.50
03-04-2025	E. Hughes	Corresponded with L. Ryan and A. Herren re: LJC Music National Spectrum invoice. (.1)	0.10	112.50	11.25
03-04-2025	G. Rodriguez	Reviewed correspondence into defendant email for additional information and confirmed auto response to same. (1.0)	1.00	337.50	337.50

Date	Professional	Description	Hours	Rate	Amount
<u>Superior Servicing - 005 Operations & Asset Sales</u>					
03-05-2025	A. Herren	Corresponded with Paracorp re: change of registered agent; completed forms for same; updated tracking spreadsheet re: same. (1.0) Corresponded with G. Rodriguez re: Saturn office refund check. (.1)	1.10	112.50	123.75
03-05-2025	G. Rodriguez	Coordinated check from Saturn office landlord re: equipment. (.3)	0.30	337.50	101.25
03-06-2025	A. Herren	Corresponded with Paracorp re: change of registered agent; researched same; completed forms; corresponded with K. Freitag re: same. (1.0)	1.00	112.50	112.50
03-06-2025	K. Freitag	Reviewed and signed registered agent forms (NV). (.2)	0.20	405.00	81.00
03-07-2025	A. Herren	Corresponded with Paracorp re: change of registered agent forms. (.2) Corresponded with K. Freitag and L. Ryan re: reviving LLC entities. (.2)	0.40	112.50	45.00
03-10-2025	A. Herren	Recorded and scanned Saturn office refund check. (.2) Reviewed Paracorp billing for multiple entities; corresponded with K. Freitag re: same. (.4)	0.60	112.50	67.50
03-10-2025	K. Freitag	Reviewed communications re: registered agent. (.1)	0.10	405.00	40.50
03-11-2025	G. Rodriguez	Confirmed receipt of deposit release from landlord. (.2)	0.20	337.50	67.50
03-11-2025	L. Ryan	Conferred with ADP re outstanding amount due and forwarded court order. (.4)	0.40	292.50	117.00
03-14-2025	A. Herren	Corresponded with Paracorp re: entity reinstatement; corresponded with K. Freitag re: same. (.3) Reviewed Paracorp billing; corresponded with K. Freitag re: same. (.3)	0.60	112.50	67.50
03-17-2025	E. Hughes	Corresponded with G. Rodriguez and A. Herren re: Tesla invoice. (.1)	0.10	112.50	11.25
03-17-2025	L. Ryan	Corresponded re accounts payables. (.2)	0.20	292.50	58.50
03-20-2025	E. Hughes	Scanned and filed mail documents and corresponded with L. Ryan, and A. Herren re: same. (.2) Scanned, logged, and filed bank NSF notices (.4)	0.60	112.50	67.50
03-21-2025	E. Hughes	Returned Saturn and Imperial office Spectrum internet equipment to UPS and corresponded with L. Ryan and A. Herren re: same. (.5) Scanned and filed mail documents and corresponded with G. Rodriguez re: same. (.2)	0.70	112.50	78.75
03-21-2025	A. Herren	Recorded and scanned water refund check. (.2)	0.20	112.50	22.50
03-28-2025	E. Hughes	Scanned, logged, and filed bank NSF notices (.2)	0.20	112.50	22.50
03-31-2025	A. Herren	Researched Harford insurance billing history; corresponded with G. Rodriguez re: same. (.2)	0.20	112.50	22.50
			153.50		26,374.50
<u>Superior Servicing - 006 Investor Relations</u>					
01-06-2025	A. Herren	Corresponded with numerous customers re student loans and case update; recorded same. (1.2)	1.20	157.50	189.00
01-24-2025	A. Herren	Corresponded with multiple customers re: case update. (.4)	0.40	157.50	63.00
02-07-2025	A. Herren	Corresponded with multiple customers re: case update. (.2)	0.20	157.50	31.50
02-18-2025	A. Herren	Corresponded with multiple customers re: case update. (.2)	0.20	157.50	31.50
02-20-2025	A. Herren	Corresponded with multiple customers re: case update. (.2)	0.20	157.50	31.50
02-21-2025	G. Rodriguez	Reviewed websites and discussion with webmaster re: alternatives to notify web users of receivership. (0.8)	0.80	157.50	126.00
03-03-2025	A. Herren	Corresponded with multiple customers re: case update. (.3)	0.30	157.50	47.25
03-05-2025	A. Herren	Corresponded with multiple customers re: case update. (.5)	0.50	157.50	78.75

Date	Professional	Description	Hours	Rate	Amount
<u>Superior Servicing - 006 Investor Relations</u>					
03-06-2025	A. Herren	Corresponded with multiple customers re: case update. (.2)	0.20	157.50	31.50
03-07-2025	A. Herren	Corresponded with multiple customers re: case update. (.2)	0.20	157.50	31.50
03-12-2025	A. Herren	Corresponded with multiple customers re: case update. (.8)	0.80	157.50	126.00
03-13-2025	A. Herren	Corresponded with multiple customers re: case update. (.2)	0.20	157.50	31.50
03-21-2025	A. Herren	Conferred and corresponded with multiple customers re: case update. (.2)	0.20	157.50	31.50
03-27-2025	A. Herren	Corresponded with multiple customers re: case update. (.8)	0.80	157.50	126.00
			6.20		976.50
<u>Superior Servicing - 010 Forensic Accounting</u>					
01-08-2025	L. Ryan	Saved, reviewed and reconciled EPPS production and corresponded with G. Rodriguez re request to follow up for additional information. (1.8) Conferred with K. Freitag re bank status. (.5) Revised subpoena request list. (1.0)	3.30	247.50	816.75
01-08-2025	K. Freitag	Conferred with L. Ryan re: banking/accounting action item list and subpoena details needed. (.5)	0.50	405.00	202.50
01-14-2025	L. Ryan	Researched Gold West payment processor. (.5)	0.50	247.50	123.75
01-16-2025	L. Ryan	Conferred with K. Freitag re bank list. (.2) Researched Comerica and BofA partial account numbers. (1.0) Updated Comerica statements to Valid8. (.4)	1.60	247.50	396.00
01-16-2025	K. Freitag	Attended call with L. Ryan re: bank list and next steps on forensic (categorize payment processors, interco.). (.2)	0.20	405.00	81.00
01-17-2025	E. Hughes	Sorted and saved down entity Chase Bank statements, conferred with and corresponded with L. Ryan re: same. (1.2)	1.20	112.50	135.00
01-17-2025	L. Ryan	Corresponded with E. Hughes re Chase statements. (.3) Updated bank list with beg/end dates and reviewed Chase documents. (2.0)	2.30	247.50	569.25
02-03-2025	L. Ryan	Downloaded Comerica production, reviewed and updated logs. (.8) Conferred with K. Freitag re same. (.1)	0.90	247.50	222.75
02-04-2025	L. Ryan	Downloaded Banner production, reviewed and updated log. (.5) Update log with IT information (GoDaddy). (.4)	0.90	247.50	222.75
02-06-2025	L. Ryan	Reviewed and saved CNB and Banner productions. (.6)	0.60	247.50	148.50
02-13-2025	L. Ryan	Followed up on status of subpoenas. (.1)	0.10	247.50	24.75
02-28-2025	L. Ryan	Corresponded re update on subpoenas. (.1)	0.10	247.50	24.75
03-06-2025	L. Ryan	Reviewed Comerica production, updated bank log and corresponded re outstanding BofA production. (.8) Reviewed Unity production and forwarded link to K. Freitag. (.4)	1.20	247.50	297.00
03-07-2025	L. Ryan	Prepared and uploaded statements and checks to Valid8. (1.2)	1.20	247.50	297.00
03-21-2025	L. Ryan	Responded to T. Fates with additional information for subpoena. (.4)	0.40	247.50	99.00
03-25-2025	L. Ryan	Downloaded and reviewed bank production, uploaded statements to Valid8, updated bank log. (.8)	0.80	247.50	198.00
03-26-2025	L. Ryan	Conferred with K. Freitag re bank production and responded to email re same. (.2) Uploaded statements to Valid8. (.3)	0.50	247.50	123.75
			1.70	405.00	688.50

Date	Professional	Description	Hours	Rate	Amount
<u>Superior Servicing - 010 Forensic Accounting</u>					
03-27-2025	K. Freitag	Met with L. Ryan re: initial forensic review. (1.2) Prepared estimate for forensic analysis; began outline for report. (.5)			
03-27-2025	L. Ryan	Corresponded with BofA re holds. (.2) Conferred with K. Freitag re action items on forensic. (1.2) Researched open items and deposits, uploaded spreadsheet. (2.0)	3.40	247.50	841.50
03-28-2025	L. Ryan	Reviewed statements and uploaded statements and check for forensic. (.6) Corresponded re subpoena. (.2) Corresponded with Unity re historical transactions. (.8)	1.60	247.50	396.00
03-28-2025	K. Freitag	Worked on estimate and uploading/downloading productions. (1.0) Conferred with L. Ryan re: follow-up. (.2)	1.20	405.00	486.00
03-31-2025	L. Ryan	Matched checks and transfers in forensic and categorized transactions. (5.4)	5.40	247.50	1,336.50
			29.60		7,731.00
			Total	305.80	68,324.65

Time Summary

Professional	Hours	Rate	Amount
A. Herren	69.00	110.32	7,611.76
A. Juroe	7.30	240.41	1,755.01
E. Hughes	68.10	103.17	7,025.63
G. Rodriguez	74.70	335.57	25,067.25
K. Freitag	22.40	405.00	9,072.00
L. Ryan	63.40	274.90	17,428.50
T. Hebrank	0.90	405.00	364.50
Total			68,324.65
Activity	Hours	Rate	Amount
Superior Servicing - 001 Tax	11.30	299.67	3,386.25
Superior Servicing - 002 General Receivership	53.30	345.52	18,416.25
Superior Servicing - 003 Asset Investigation & Recovery	7.90	355.16	2,805.75
Superior Servicing - 003 Travel to Property	22.50	66.65	1,499.65
Superior Servicing - 004 Reporting	21.50	331.85	7,134.75
Superior Servicing - 005 Operations & Asset Sales	153.50	171.82	26,374.50
Superior Servicing - 006 Investor Relations	6.20	157.50	976.50
Superior Servicing - 010 Forensic Accounting	29.60	261.18	7,731.00
Total Fees			68,324.65

Expense Summary

Expense	Amount
Copies & Postage	159.99
Forensic IT Third-Party Vendor	26,474.12
Project Specific Forensic Accounting Software	12,500.00
Travel - Out of Pocket Expenses	1,556.08
Website, Phone and Other IT	1,957.36
Total Expenses	42,647.55
Total for this Invoice	110,972.20