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Attorneys for Receiver Krista Freitag

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 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

SOLUTIONS USA LLC, ALUMNI ADVANTAGE LLC, STUDENT PROCESSING CENTER GROUP LLC, SPCTWO LLC, and ACCREDIT LLC; and

DAVID HERNANDEZ, individually and as owner, officer, or manager of SUPERIOR SERVICING LLC, SUNRISE SOLUTIONS USA LLC, ALUMNI ADVANTAGE LLC, STUDENT PROCESSING CENTER GROUP LLC, SPCTWO LLC, and ACCREDIT LLC,

Defendants.

Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), general counsel to Krista L. Freitag (the "Receiver"), the Court-appointed receiver for 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 Accredit, 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 ("Application"). This Application covers the period from January 1, 2025 through March 31, 2025 (the "Application Period"), and seeks approval of $43,538.30 in fees and $2,780.44 in expenses, and an order authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred ($34,830.64) and 100% of the expenses incurred ($2,780.44).

I. INTRODUCTION

This equity receivership involves a large student loan debt relief scheme that is the subject of the Complaint and Amended Complaint filed by the Federal Trade Commission ("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 Preliminary Injunction Order as to

Defendant Dennise Merdjanian entered on December 19, 2024 (Dkt. 42) (the "Appointment Orders").

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

This Application seeks approval of $43,538.30 in fees for a total of 61.4 hours worked, and payment on an interim basis of 80% of that amount, or $34,830.64. Allen Matkins has agreed to discount its standard hourly rates by 10% for this case. The work performed is described task-by-task in **Exhibit A**[1] and is broken down into the following categories:

Category	**Hours**	**Amount**
General Receivership	5.80	$4,640.40
Asset Investigation & Recovery	51.40	$35,514.90
Reporting	0.20	$161.00
Operations & Asset Sales	0.30	$241.65
Claims & Distributions	2.70	$2,174.85
Employment/Fees	1.00	$805.50
Total Fees	61.40	$43,538.30

[1] While Allen Matkins 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 Allen Matkins personnel, and contains accurate descriptions of the services rendered.

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 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. Allen Matkins communicated with counsel for the FTC and counsel for Defendants Merdjanian, Caldwell and Hernendez regarding issues relating to financial disclosures, turnover of records and data, withdrawal by counsel for Caldwell and Hernandez, the FTC's motion to file its Amended Complaint, and related issues. The firm also assisted the Receiver with issues relating to the Receivership Entities' insurance policies and tax accountants (Yaeger). The reasonable and necessary fees for Allen Matkins' work in this category total $4,640.40.

2. Asset Investigation & Recovery

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

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

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

Allen Matkins devoted considerable time to identifying, securing and recovering receivership assets. Despite the provisions of the Appointment Orders, very little information or cooperation regarding the turnover of assets to the Receiver was provided by the Receivership Entities' former principals. As noted above, Allen Matkins also spent considerable time working to locate and recover electronic data of the receivership entities. The firm also assisted the Receiver in identifying necessary and appropriate subpoena targets, preparing subpoenas, and conferring with recipients regarding any production objections and/or issues including, but not limited to, the allocation of costs associated with preparing a response and producing responsive materials.

Allen Matkins also advised the Receiver on the appropriate scope and approach to her forensic accounting analysis pursuant to the Appointment Orders. The firm also advised and assisted the Receiver in tendering claims to the insurance carrier for certain of the Receivership Entities under their employee dishonesty insurance coverage. The reasonable and necessary fees for Allen Matkins' work in this category total $35,514.90.

3. Reporting

Allen Matkins' limited time in this category during the Application Period was focused on advising the Receiver on the timing and content for her Second Interim Report, which was filed later on May 9, 2025. Dkt. 69. The reasonable and necessary fees for Allen Matkins' work in this category total $161.00.

4. Operations & Asset Sales

Allen Matkins' limited time in this category during the Application Period was focused on the termination of a pre-receivership vendor contract. The reasonable and necessary fees for Allen Matkins' work in this category total $241.65.

5. Claims & Distributions

Services rendered in this category generally relate to the claims and interests of investors and creditors of the Receivership Entities. Allen Matkins assisted with issues related to disseminating information about the receivership to student loan customers and former employees, including notification letters, and information provided on the receivership website (www.superiorservicingreceivership.com). The firm also assisted in responding to certain specific inquiries from former customers and employees. The reasonable and necessary fees for Allen Matkins' work in this category total $2,174.85.

6. Employment/Fees

The Receiver and Allen Matkins do not charge any time for preparing their own detailed fee applications. The firm assisted the Receiver in preparing her First Interim Fee Application and with communications with the FTC relating thereto. The reasonable and necessary fees for Allen Matkins' work in this category total $805.50.

B. Summary of Expenses Requested for Reimbursement

Allen Matkins requests that the Court approve reimbursement of $2,780.44 in out-of-pocket costs. The itemization of such expenses is summarized below by billing category.

Category	**Total**
Messenger/FedEx Fees	$31.38
Service of Process	$860.00
Court/Filing Fees	$13.56
Subpoenaed Documents	$1,866.00
Research/PACER	$9.40
Duplication	$0.10
Total Costs	$2,780.44

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-factor balancing test involving the "economy of administration, the burden that the estate may be able to bear, the amount of time required, although not necessarily expended, and the overall value of the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F.2d

232, 237 (3d Cir. 1970). Regardless of how this balancing test is formulated, no single factor is determinative and "a reasonable fee is based [upon] all circumstances surrounding the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F. Supp. 465, 480 (S.D. Tex. 1974).

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

As previously noted, the Receiver promptly determined that utilizing a few third-party vendors and her experienced staff at E3 as well as experienced, qualified counsel was critical due to the lack of records, size and complexity of the receivership estate. Allen Matkins has submitted a detailed fee application which describes the nature of the services rendered. *See* **Exhibit A**. Allen Matkins has endeavored to staff matters as efficiently as possible while remaining cognizant of the complexity of issues presented. As noted above, the request for fees is based on Allen Matkins' customary billing rates charged for comparable services provided in other matters, less a 10% discount. The firm also wrote off and did not charge for 4.1 hours of time ($3,421.35 in fees).

The work performed by Allen Matkins was essential to carrying out the Receiver's Court-ordered duties. The Receiver and Allen Matkins have worked diligently since the Receiver's appointment to preserve and protect the assets of the receivership estate, maximize the funds available for ultimate distribution to customers and creditors, and carry out the Receiver's other duties pursuant to the Appointment Order. Moreover, Allen Matkins seeks payment of only 80% of fees incurred on an interim basis in recognition of the fact that its work in assisting the Receiver is ongoing. Payment of the proposed 20%

holdback will be sought at the conclusion of the receivership. Allen Matkins' fees are fair and reasonable and should be approved and paid on an interim basis.

IV. CONCLUSION

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

1. Approving Allen Matkins' fees of $43,538.30;

2. Authorizing and directing the Receiver to pay 80% of approved fees, or $34,830.64, from the assets of the Receivership Entities;

3. Approving Allen Matkins' costs in the amount of $2,780.44, and authorizing and directing the Receiver to reimburse such costs in full; and

4. For such other and further relief as the Court deems appropriate.

Dated: September 10, 2025

ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP

By: *Edward G. Fates*
EDWARD G. FATES
Attorneys for Receiver
Krista L. Freitag

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 May 9, 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 ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP, GENERAL COUNSEL TO THE RECEIVER, KRISTA L. FREITAG, 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**
  lgallegos@ftc.gov; egarcia@ftc.gov; mwilshire@ftc.gov,mwernz@ftc.gov
- **Paul Rowland Graff**
  rgraff@crdslaw.com; ygiraud@crdslaw.com; cweber@crdslaw.com; attorneygraff@gmail.com
- **Robert Christopher Reade**
  Creade@crdslaw.com; ygiraud@crdslaw.com; adavid@crdslaw.com; mrodriguez@crdslaw.com; cweber@crdslaw.com; crodriguezvisek@crdslaw.com; kkeyes@crdslaw.com
- **Jarrod L. Rickard**
  jlr@semenzarickard.com; oak@semenzarickard.com; alb@semenzarickard.com
- **Reid Abram Tepfer**
  rtepfer@ftc.gov

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

Executed on May 9, 2025, at San Diego, California.

/s/ Pamela Tei Lewis
Pamela Tei Lewis

EXHIBIT INDEX

EXHIBIT	DESCRIPTION	PAGE NOS.
Exhibit A	Allen Matkins Leck Gamble Mallory & Natsis LLP Billing Entries	13-42

EXHIBIT A

Allen Matkins Leck Gamble Mallory & Natsis LLP Billing Entries

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted)
Matter #: 395887.00002
Client Name: Krista Freitag, as Receiver for Superior
Date of Last Billing: 02/21/25
Matter Name: General Receivership
Proforma Number: 1337415
Client/Matter Joint Group # 395887.1
Client Matter Number:

Fees for Matter 395887.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
01/06/25	9903297	Communications with counsel for Caldwell / Hernandez and counsel for FTC regarding motion to withdraw and financial disclosures	Fates, Edward (Ted)	0.20	161.10	161.10	WO	HD	TR	____
01/06/25	9912095	Confer with Ted Fates regarding case updates	Pham, Matt D.	0.20	129.60	290.70	WO	HD	TR	____
01/07/25	9905321	Call with Receiver and FTC counsel regarding issues with Merdjanian, Caldwell and Hernandez, collection of records and data, accounting analysis and related issues (.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.60	483.30	774.00	WO	HD	TR	____
01/08/25	9906570	Communications with counsel for Caldwell and Hernandez regarding financial disclosures (.1) analyze order approval withdrawal of counsel for Caldwell and Hernandez and advise Receiver re: same (.2)	Fates, Edward (Ted)	0.30	241.65	1,015.65	WO	HD	TR	____
01/16/25	9916096	Advise Receiver on issues relating to tax accountant and 2024 tax returns for receivership entities	Fates, Edward (Ted)	0.30	241.65	1,257.30	WO	HD	TR	____

Fees for Matter 395887.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
02/05/25	9940777	Discuss scope of tax work and draft agreement with CPA firm re: same with Receiver (.4)	Fates, Edward (Ted)	0.40	322.20	1,579.50	WO	HD	TR	____
02/06/25	9942580	Advise G. Rodriguez on issues relating to emails from Caldwell and Yeager about Caldwell personal tax return	Fates, Edward (Ted)	0.60	483.30	2,062.80	WO	HD	TR	____
02/12/25	9949337	Analyze and advise Receiver on insurance policy renewal and claim issues for Superior and Accredit	Fates, Edward (Ted)	0.70	563.85	2,626.65	WO	HD	TR	____
02/18/25	9954420	Analyze and revise draft agreement for booking and tax services with Yaeger firm (.9) advise Receiver and L. Ryan re: same (.5)	Fates, Edward (Ted)	1.40	1,127.70	3,754.35	WO	HD	TR	____
02/27/25	9966736	Analyze FTC motion to amend complaint to add entities and individual defendants (.4) discuss same with Receiver (.2) communications with FTC counsel re: electronic service of proposed amended complaint (.1)	Fates, Edward (Ted)	0.70	563.85	4,318.20	WO	HD	TR	____
03/05/25	9976304	Communications with Receiver and FTC counsel regarding issues relating to proposed amended complaint	Fates, Edward (Ted)	0.20	161.10	4,479.30	WO	HD	TR	____
03/26/25	10001664	Advise Receiver regarding order granting FTC motion for leave to amend and filing of FTC's first amended complaint	Fates, Edward (Ted)	0.20	161.10	4,640.40	WO	HD	TR	____

Disbursements for Matter 395887.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
01/02/25	2916286	FILING – One Legal - Filing Fee for Superior Court of California, Riverside County, Stipulation; 12/19/2024	0.00	13.56	WO	HD	TR	_____
01/02/25	2918351	COURT – Other Court Charges - Pamela Lewis - SUPERIORCOURTLAPUBLICACCE - Document download. 12/19/2024	0.00	3.00	WO	HD	TR	_____
01/02/25	2919533	POS – Service of Process - Nationwide Legal LLC - JPMorgan Chase Bank, National Association c/o C T Corporation SystemSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION; 12/13/2024	0.00	199.20	WO	HD	TR	_____
01/02/25	2919534	POS – Service of Process - Nationwide Legal LLC - Comerica Bank c/o Corporate Creations Network Inc.SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION; 12/13/2024	0.00	199.20	WO	HD	TR	_____
01/02/25	2919739	MSNGR – Messenger - First Legal LLC - Allen Matkins - San Diego; COGS; Advance $1.00; 12/27/2024	0.00	1.00	WO	HD	TR	_____
01/13/25	2916972	ADV – Comerica Bank - Retainer for documents produced by Comerica Bank per subpoena for records	0.00	1,273.50	WO	HD	TR	_____
01/14/25	2917314	BW – Duplication - Black & White Copies	1.00	0.10	WO	HD	TR	_____
01/16/25	2922693	POS – Service of Process - Nationwide Legal LLC - City National Bank, c/o City National Bank Legal Processing UnitSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	199.20	WO	HD	TR	_____
01/16/25	2922694	POS – Service of Process - Nationwide Legal LLC - Banner Bank, c/o C T Corporation SystemSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	199.20	WO	HD	TR	_____
01/16/25	2922695	POS – Service of Process - Nationwide Legal LLC - Bank of America, National Association c/o CT Corporation SystemSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	59.20	WO	HD	TR	_____
01/29/25	2918837	ODS – Comerica Bank - Balance for documents produced by Comerica Bank per subpoena for records	0.00	424.50	WO	HD	TR	_____

01/29/25	2921064	MSNGR – Federal Express - Ship To: Kimberly Lau - ComericA Bank	0.00	31.38	WO	HD	TR	____
02/06/25	2920683	ODS – Production of Documents - Edward (Ted) Fates - City National Bank via Secure-Share.com - City National Bankk Document Production Fee	0.00	84.00	WO	HD	TR	____
02/06/25	2926326	COURT – Other Court Charges - Edward (Ted) Fates - SECURE-SHARE.COM - Fees for subpoenaed records (City National Bank)	0.00	84.00	WO	HD	TR	____
02/10/25	2927649	DCSRCH – Document Search - PACER - Usage 4nd QTR	0.00	8.90	WO	HD	TR	____
02/10/25	2927650	DCSRCH – Document Search - PACER - Usage 4nd QTR	0.00	0.50	WO	HD	TR	____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	5.60	805.50	4,510.80
002510	Pham, Matt D.	0.20	648.00	129.60
		5.80		$4,640.40
Subtotal Fees				$4,640.40
Discount				0.00
Total Fees				4,640.40
Total Disbursements				2,780.44

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic) no text editing; copies @ .10

Account Summary – As Of 05/09/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	44,649.20	44,593.20	56.00	7,581.94	4,801.50	2,780.44	48,270.53	44,593.20	3,677.33

Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	40,688.59	39,791.70	896.89	40,688.59	39,791.70	896.89	39,791.70	39,791.70	896.89
Collected	40,688.59	39,791.70	896.89	40,688.59	39,791.70	896.89	40,688.59	39,791.70	896.89
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

	Total	***Fees***	***Costs***
WIP Balance	***7,792.84***	***4,801.50***	***2,991.34***
AR Balance	***0.00***	***0.00***	***0.00***
Unalloc Payment	***0.00***		
Client Trust Balance	***0.00***		

Billing Address

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

05/09/25 14:30:43 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: 02/21/25
Matter Name: Asset Investigation & Recovery
Proforma Number: 1337415
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			
01/06/25	9903780	Discuss strategy on investigative tasks and next steps with Receiver (.4) advise on issues relating to subpoenas issued to Comerica bank and Go Daddy (.4)	Fates, Edward (Ted)	0.80	644.40	644.40	WO	HD	TR	____
01/06/25	9903844	Communications with K. Lau (Comerica) and T. Fates; research regarding costs and expenses in responding to federal subpoena; communications with W. Lee (JPMorgan Chase) regarding extension request.	Pendleton, Michelle	0.50	195.75	840.15	WO	HD	TR	____
01/07/25	9912102	Phone call with GoDaddy's counsel regarding domain turnover issues (0.9); Confer with Geno Rodriguez regarding GoDaddy's requests (0.3)	Pham, Matt D.	1.20	777.60	1,617.75	WO	HD	TR	____
01/08/25	9906413	Communications with T. Fates and K. Lau (Comerica) regarding revised scope of Subpoena requests; draft summary of the same.	Pendleton, Michelle	0.40	156.60	1,774.35	WO	HD	TR	____
01/08/25	9906510	Advise on issues relating to Comerica bank subpoena (.3) discuss same with	Fates, Edward (Ted)	1.40	1,127.70	2,902.05	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		Receiver (.1) advise on issues relating to web domains and subpoena to G. Daddy (.3) communications with Receiver and Landlord regarding 3020 Saturn office space (.7)								
01/13/25	9911110	Advise on issues relating to subpoena to Comerica for bank records (.2) communications with vendor for SPCTwo regarding documents and information needed (.3)	Fates, Edward (Ted)	0.50	402.75	3,304.80	WO	HD	TR	____
01/13/25	9911447	Communications with T. Fates and K. Lau regarding Comerica amended subpoena records; communications with W. Lee regarding JPMorgan Chase records.	Pendleton, Michelle	0.30	117.45	3,422.25	WO	HD	TR	____
01/13/25	9920904	Email correspondence with GoDaddy's counsel regarding requested information (0.2); Phone call with Microsoft's counsel regarding update on account search (0.3)	Pham, Matt D.	0.50	324.00	3,746.25	WO	HD	TR	____
01/14/25	9913123	Discuss issues relating to company office spaces, company computers and steps to vacate / surrender spaces back to landlords with Receiver and G. Rodriguez (.6) communications with G. Rodriguez regarding information and documents needed from vendor (.3) discuss subpoenas to three additional banks with Receiver (.3)	Fates, Edward (Ted)	1.20	966.60	4,712.85	WO	HD	TR	____
01/15/25	9914162	Advise on subpoenas for documents to be issued to banks for account-related	Fates, Edward (Ted)	0.80	644.40	5,357.25	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		records (.4) revisions to same (.3) advise on issues relating to Chase document production (.1)								
01/15/25	9914239	Communications with T. Fates; research regarding service of process guidelines; draft Subpoenas for records to Bank of America, City National Bank, and Banner Bank; draft requests for production of documents to accompany same; initial review of records provided by JPMorgan Chase in response to Subpoena; draft summary of possible meet and confer.	Pendleton, Michelle	1.30	508.95	5,866.20	WO	HD	TR	____
01/16/25	9915361	Analyze information from G. Rodriguez on vendor Array, services provided to borrower customers, and production of documents and information (.2) advise on issues with Chase bank response to subpoena (.3)	Fates, Edward (Ted)	0.50	402.75	6,268.95	WO	HD	TR	____
01/16/25	9915403	Revise requests for production to accompany additional bank records Subpoenas.	Pendleton, Michelle	0.10	39.15	6,308.10	WO	HD	TR	____
01/16/25	9915858	Call with Receiver and counsel for FTC regarding preservation and review of company computer data, forensic accounting issues, and related issues	Fates, Edward (Ted)	0.40	322.20	6,630.30	WO	HD	TR	____
01/17/25	9916698	Assist Receiver with communication to Caldwell and Hernandez regarding domains associated with receivership entities	Fates, Edward (Ted)	0.20	161.10	6,791.40	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
01/23/25	9923625	Review and analyze request from Banner Bank; communications with A. Sargeant regarding research and responding to Subpoena.	Pendleton, Michelle	0.30	117.45	6,908.85	WO	HD	TR	_____
01/23/25	9923640	Advise on issues relating to subpoena for documents issued to Banner Bank	Fates, Edward (Ted)	0.20	161.10	7,069.95	WO	HD	TR	_____
01/24/25	9924425	Advise Receiver regarding issue relating to D. Hernandez potential dispute relating to Gold West Financial (.4) discuss plan for vacating and surrendering leased office spaces with Receiver (.2) call with counsel for Landlord re: anticipated move our and surrender of space (.3)	Fates, Edward (Ted)	0.90	724.95	7,794.90	WO	HD	TR	_____
01/28/25	9929539	Discuss issues with company websites / domains with Receiver (.4) communications with counsel for D, Merdjanian re: same (.7)	Fates, Edward (Ted)	1.10	886.05	8,680.95	WO	HD	TR	_____
01/29/25	9930282	Review extension request from K. Lau (Comerica Bank) and follow up updated invoice; communications with T. Fates.	Pendleton, Michelle	0.20	78.30	8,759.25	WO	HD	TR	_____
01/29/25	9930283	Advise on issues relating to Comerica subpoena, document production and costs associated therewith (.2) discuss domain access issues with Receiver (.1)	Fates, Edward (Ted)	0.30	241.65	9,000.90	WO	HD	TR	_____
01/30/25	9931761	Advise on next steps for document production from Comerica	Fates, Edward (Ted)	0.30	241.65	9,242.55	WO	HD	TR	_____
01/30/25	9934454	Review and process records from Comerica in response to Subpoena;	Pendleton, Michelle	0.70	274.05	9,516.60	WO	HD	TR	_____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		communications with T. Fates; create share file link to provide same to K. Freitag.								
01/31/25	9934456	Analyze subpoena records from Comerica; draft brief summary of the same as to dates, accounts, and individuals with access; communications with K. Freitag.	Pendleton, Michelle	0.90	352.35	9,868.95	WO	HD	TR	____
01/31/25	9935663	Phone call with GoDaddy's counsel regarding outstanding domain issues (0.3); Email correspondence with Geno Rodriguez regarding latest update from GoDaddy's counsel (0.3)	Pham, Matt D.	0.60	388.80	10,257.75	WO	HD	TR	____
02/03/25	9938765	Communications with A. Sargaent regarding records Subpoena to Banner Bank and account documents still outstanding.	Pendleton, Michelle	0.20	78.30	10,336.05	WO	HD	TR	____
02/03/25	9938771	Advise on issues relating to document subpoena issued to Banner Bank (.1) advise Receiver on chain of custody issues for transporting company computers to storage space (.3)	Fates, Edward (Ted)	0.40	322.20	10,658.25	WO	HD	TR	____
02/04/25	9939902	Discuss issues with scope of forensic accounting with Receiver (.4) analyze and revise draft agreement for moving services (.3) communications with City National Bank and Banner Bank re: document subpoenas and productons (.3) analyze and advise on issues relating to recovery of data from company slack messaging channels (.4)	Fates, Edward (Ted)	1.40	1,127.70	11,785.95	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
02/04/25	9940252	Follow up with T. Fates regarding status of Slack demands for information, analyze entered PI order in connection with same (.2); conference with T. fates regarding same (.2).	Kebeh, Alphamorlai "Mo"	0.40	219.60	12,005.55	WO	HD	TR	____
02/04/25	9940358	Review and process Banner Bank records provided in response to Subpoena; analyze records and draft summary of the same; create share file; communications with T. Fates and K. Freitag.	Pendleton, Michelle	1.40	548.10	12,553.65	WO	HD	TR	____
02/04/25	9947301	Email correspondence with GoDaddy's counsel regarding domain names and email account issues	Pham, Matt D.	0.30	194.40	12,748.05	WO	HD	TR	____
02/05/25	9941074	Communications with T. Fates and Natalie (City National Bank); review correspondence regarding production of Subpoenaed records.	Pendleton, Michelle	0.40	156.60	12,904.65	WO	HD	TR	____
02/05/25	9941324	Discuss issues relating to control over Slack messaging channels and recovery of data from same with Receiver and G. Rodriguez (.7) advise on next steps (.2)	Fates, Edward (Ted)	0.90	724.95	13,629.60	WO	HD	TR	____
02/05/25	9943633	Attention to correspondence from T. Fates regarding strategy regarding accessing slack channel information (.1).	Kebeh, Alphamorlai "Mo"	0.10	54.90	13,684.50	WO	HD	TR	____
02/05/25	9947310	Phone call with GoDaddy's counsel regarding update on GoDaddy's response to Receiver's request on domain names	Pham, Matt D.	0.10	64.80	13,749.30	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
02/06/25	9942453	Discuss status and approach to recovery of data from Slack messaging channels with G. Rodriguez (.2) advise on issues relating to CNB response to document subpoena (.1)	Fates, Edward (Ted)	0.30	241.65	13,990.95	WO	HD	TR	____
02/06/25	9942655	Review and process records provided by City National Bank, and additional records provided by Banner Bank, in response to Subpoenas; analyze account records and draft brief summary of productions; communications with T. Fates, K. Freitag, and L. Ryan regarding productions.	Pendleton, Michelle	0.80	313.20	14,304.15	WO	HD	TR	____
02/07/25	9944257	Communications with counsel for D. Merdjanian regarding secretary of state filings for entities	Fates, Edward (Ted)	0.20	161.10	14,465.25	WO	HD	TR	____
02/11/25	9948447	conference with J. del Castillo regarding upcoming reporting obligations and general receivership strategy (.1).	Kebeh, Alphamorlai "Mo"	0.10	54.90	14,520.15	WO	HD	TR	____
02/12/25	9949437	Discuss timing of move out and surrender of leased space at Saturn Street to landlord with G, Rodriguez (.2) analyze and advise Receiver and G. Rodriguez on insurance policy renewal and potential employee dishonesty claim issues for Superior and Accredit (1.4)	Fates, Edward (Ted)	1.60	1,288.80	15,808.95	WO	HD	TR	____
02/18/25	9962509	Email correspondence with Geno Rodriguez regarding outstanding domain issue (0.1); Phone call with GoDaddy's counsel regarding update on request	Pham, Matt D.	0.20	129.60	15,938.55	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		relating to domains (0.1)								
02/20/25	9958353	Analyze and discuss potential employee dishonesty claims against Superior and Accredit insurance policies with G. Rodriguez (.4) work on letter to insurance carrier regarding claims for employee dishonesty (1.4)	Fates, Edward (Ted)	1.80	1,449.90	17,388.45	WO	HD	TR	____
02/21/25	9959552	Advise G. Rodriguez on issues relating to furniture at Saturn Street premises, issues relating to security deposit, and issues relating to Slack messaging data (.4) advise on next steps regarding Slack messaging data (.3)	Fates, Edward (Ted)	0.70	563.85	17,952.30	WO	HD	TR	____
02/21/25	9959561	Conference with T. Fates regarding status of efforts to obtain slack communications/materials (.2); memo to Slack representative renewing request for turnover of data and administrative access (.8).	Kebeh, Alphamorlai "Mo"	1.00	549.00	18,501.30	WO	HD	TR	____
02/25/25	9963822	Work on letter to Hartford insurance regarding employee dishonesty claim (.6) discuss same with Receiver and G. Rodriguez (.2)	Fates, Edward (Ted)	0.80	644.40	19,145.70	WO	HD	TR	____
02/25/25	9970384	Email correspondence with Geno Rodriguez regarding update from GoDaddy's counsel	Pham, Matt D.	0.20	129.60	19,275.30	WO	HD	TR	____
02/26/25	9965169	Discuss letter re: employee dishonesty insurance claim with Receiver (.3) revise and finalize letter (.3) advise on next steps regarding preservation/recovery of	Fates, Edward (Ted)	1.10	886.05	20,161.35	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		Slack messaging data (.2) communications with G. Rodriguez re: surrender of leased space to landlord (.3)								
02/26/25	9965522	Correspondence with Slack team regarding production of materials (.1).	Kebeh, Alphamorlai "Mo"	0.10	54.90	20,216.25	WO	HD	TR	____
02/28/25	9970400	Email correspondence with Geno Rodriguez regarding information needed for motions compelling compliance/cooperation	Pham, Matt D.	0.20	129.60	20,345.85	WO	HD	TR	____
03/03/25	9975211	Follow up communications with counsel for Slack regarding messaging data (.3) communications with Hartford Insurance re: claims asserted under policies (.6) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.10	886.05	21,231.90	WO	HD	TR	____
03/05/25	9976333	Communications with counsel for Slack regarding preservation and recovery of Slack messaging data (.8) analyze proposed authorization agreement (.4) discuss same with Receiver and G. Rodriguez (.3)	Fates, Edward (Ted)	1.50	1,208.25	22,440.15	WO	HD	TR	____
03/06/25	9977436	Call with Receiver and FTC counsel regarding forensic accounting issues, document and data gathering issues, and related issues (.4) discuss data gathering issues relating to GoDaddy and Slack with Receiver and G. Rodriguez (.5) communications with counsel for Slack (.4) work on authorization agreement with Slack re: access to messaging data (.6)	Fates, Edward (Ted)	1.90	1,530.45	23,970.60	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
03/07/25	9978389	Advise on next steps regarding subpoena for records issued to Bank of America (.4) call with Receiver and G. Rodriguez regarding email data and next steps regarding GoDaddy and Microsoft (.9) call with Bank of America re: outstanding subpoena for documents (.6)	Fates, Edward (Ted)	1.90	1,530.45	25,501.05	WO	HD	TR	____
03/07/25	9978588	Communications with S. Ryan and T. Fates regarding lack of response from Bank of America; communications with legal department regarding same.	Pendleton, Michelle	0.50	195.75	25,696.80	WO	HD	TR	____
03/07/25	9981790	Confer with Allen Matkins team regarding approach for dealing with Bank of America on subpoena (0.2); Virtually meet with client regarding approach for requesting document/information turnover from tech companies (1.0); Email correspondence with Xactus, GoDaddy, Microsoft, and Forth regarding document/information turnover (0.3)	Pham, Matt D.	1.50	972.00	26,668.80	WO	HD	TR	____
03/10/25	9980035	Attention to correspondence from Slack regarding requirements to turn over communication channel data, analyze executed authorization form regarding same (.3).	Kebeh, Alphamorlai "Mo"	0.30	164.70	26,833.50	WO	HD	TR	____
03/10/25	9980162	Follow up communications with counsel for Slack re: production of messaging data (.5) discuss same with G. Rodriguez (.3)	Fates, Edward (Ted)	0.80	644.40	27,477.90	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
03/10/25	9981206	Create share file for release of Slack files; communications with S. Gilmer-Herr and T. Fates.	Pendleton, Michelle	0.10	39.15	27,517.05	WO	HD	TR	____
03/11/25	9983500	Review and process Slack records from S. Gilmer-Herr; communications with T. Fates regarding the same.	Pendleton, Michelle	0.50	195.75	27,712.80	WO	HD	TR	____
03/11/25	9983532	Analyze and advise on files produced by Slack (.5) communications with Slack re: same (.2)	Fates, Edward (Ted)	0.70	563.85	28,276.65	WO	HD	TR	____
03/11/25	9983795	Attention to status of outstanding action items, correspondence with T. Fates regarding same (.3).	Kebeh, Alphamorlai "Mo"	0.30	164.70	28,441.35	WO	HD	TR	____
03/11/25	10005905	Email correspondence with Set Forth regarding returned transactions	Pham, Matt D.	0.20	129.60	28,570.95	WO	HD	TR	____
03/12/25	9984397	Analyze issues relating to Slack data production (.3) advise on issues relating to recovery of email data (.2)	Fates, Edward (Ted)	0.50	402.75	28,973.70	WO	HD	TR	____
03/12/25	9984459	Review and process remaining Slack files from S. Gilmer-Herr; draft summary of data provided; communications with T. Fates.	Pendleton, Michelle	1.00	391.50	29,365.20	WO	HD	TR	____
03/12/25	9984622	Analyze inventory sheet regarding slack production and related correspondence (.2).	Kebeh, Alphamorlai "Mo"	0.20	109.80	29,475.00	WO	HD	TR	____
03/12/25	10005933	Phone call with GoDaddy's counsel regarding preservation of data	Pham, Matt D.	0.50	324.00	29,799.00	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
03/13/25	9985493	Follow up communications with counsel for Slack regarding document production and transfer of control over messaging channels (.4) communications with Receiver and G. Rodriguez re: same (.3) call with Bank of America regarding outstanding subpoena for bank records (.4)	Fates, Edward (Ted)	1.10	886.05	30,685.05	WO	HD	TR	____
03/13/25	9985631	Attention to correspondence regarding transfer/turnover of slack data to receiver (.1).	Kebeh, Alphamorlai "Mo"	0.10	54.90	30,739.95	WO	HD	TR	____
03/13/25	9985825	Prepare share file for Slack files provided; communications with K. Freitag and G. Rodriguez regarding the same and inventory.	Pendleton, Michelle	0.30	117.45	30,857.40	WO	HD	TR	____
03/13/25	10005944	Virtually meet with Microsoft's counsel regarding preservation of data	Pham, Matt D.	0.40	259.20	31,116.60	WO	HD	TR	____
03/14/25	9986596	Communications with Bank of America regarding document production (.3) communications with Slack regarding transfer of control of messaging channels (.2)	Fates, Edward (Ted)	0.50	402.75	31,519.35	WO	HD	TR	____
03/14/25	9993871	Attention to correspondence from slack regarding timing of data transfer regarding slack channel ownership (.1).	Kebeh, Alphamorlai "Mo"	0.10	54.90	31,574.25	WO	HD	TR	____
03/17/25	9988736	Communications with Bank of America and L. Ryan regarding subpoena and document production	Fates, Edward (Ted)	0.20	161.10	31,735.35	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
03/17/25	10005987	Virtually meet with Xactus's counsel regarding documents that can be turned over (0.2); Virtually meet with Set Forth's representative regarding explanation of returned transactions (0.3)	Pham, Matt D.	0.50	324.00	32,059.35	WO	HD	TR	_____
03/18/25	9991965	Communications with G. Rodriguez and Slack regarding turnover of company messaging accounts	Fates, Edward (Ted)	0.30	241.65	32,301.00	WO	HD	TR	_____
03/18/25	9993873	Attention to correspondence from slack regarding update regarding access to slack channels (.1).	Kebeh, Alphamorlai "Mo"	0.10	54.90	32,355.90	WO	HD	TR	_____
03/19/25	9993099	Communications with G. Rodriguez regarding recovery of Slack messaging data	Fates, Edward (Ted)	0.40	322.20	32,678.10	WO	HD	TR	_____
03/20/25	9994118	Communications with Bank of America, Receiver and L. Ryan regarding outstanding subpoena for records and timing of document production	Fates, Edward (Ted)	0.40	322.20	33,000.30	WO	HD	TR	_____
03/20/25	9998660	Email correspondence with client regarding updates on Redstone, GoDaddy, Microsoft, Xactus, and Set Forth	Pham, Matt D.	0.40	259.20	33,259.50	WO	HD	TR	_____
03/21/25	9995221	Communications with L. Ryan and Bank of America regarding information requested relating to pending subpoena and timing of document production	Fates, Edward (Ted)	0.50	402.75	33,662.25	WO	HD	TR	_____
03/24/25	9997198	Analyze letter from Hartford insurance regarding denial of coverage and respond to same	Fates, Edward (Ted)	0.90	724.95	34,387.20	WO	HD	TR	_____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
03/26/25	10001255	Discuss records missing from Bank of America production with Receiver and L. Ryan (.2) communications with Bank of America re: same (.2) discuss forensic accounting analysis with Receiver (.3)	Fates, Edward (Ted)	0.70	563.85	34,951.05	WO	HD	TR	____
03/27/25	10002936	Discuss issues relating to scope of forensic accounting work and budget for same with Receiver	Fates, Edward (Ted)	0.30	241.65	35,192.70	WO	HD	TR	____
03/28/25	10003647	Assist Receiver with preparing summary of forensic approach and analysis	Fates, Edward (Ted)	0.40	322.20	35,514.90	WO	HD	TR	____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	31.90	805.50	25,695.45
002510	Pham, Matt D.	6.80	648.00	4,406.40
002603	Pendleton, Michelle	9.90	391.50	3,875.85
002661	Kebeh, Alphamorlai "Mo"	2.80	549.00	1,537.20
		51.40		$35,514.90
Subtotal Fees				$35,514.90
Discount				0.00
Total Fees				35,514.90
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

05/09/25 14:30:43 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

expires 6/30/2026: 10% off standard rates (automatic) no text editing; copies @ .10

Account Summary – As Of 05/09/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	75,989.25	75,989.25	0.00	54,886.50	54,886.50	0.00	75,989.25	75,989.25	0.00
Unbilled Adj	1.92	1.92	0.00	0.00	0.00	0.00	1.92	1.92	0.00
Billed	21,100.83	21,100.83	0.00	21,100.83	21,100.83	0.00	21,100.83	21,100.83	0.00
Collected	21,100.83	21,100.83	0.00	21,100.83	21,100.83	0.00	21,100.83	21,100.83	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

	Total	***Fees***	***Costs***
WIP Balance	***54,886.50***	***54,886.50***	***0.00***
AR Balance	***0.00***	***0.00***	***0.00***
Unalloc Payment	***0.00***		
Client Trust Balance	***0.00***		

Billing Address

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

05/09/25 14:30:45 PROFORMA STATEMENT FOR MATTER 395887.00004 (Krista Freitag, as Receiver for Superior) (Reporting)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted)
Matter #: 395887.00004
Client Name: Krista Freitag, as Receiver for Superior
Date of Last Billing: 02/21/25
Matter Name: Reporting
Proforma Number: 1337415
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			
03/18/25	9992078	Discuss timing and content for next interim report with Receiver	Fates, Edward (Ted)	0.20	161.10	161.10	WO	HD	TR	____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.20	805.50	161.10
		0.20		$161.10
Subtotal Fees				$161.10
Discount				0.00
Total Fees				161.10
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic) no text editing; copies @ .10

05/09/25 14:30:45 PROFORMA STATEMENT FOR MATTER 395887.00004 (Krista Freitag, as Receiver for Superior) (Reporting)

Account Summary – As Of 05/09/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	6,927.30	6,927.30	0.00	1,127.70	1,127.70	0.00	6,927.30	6,927.30	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	5,799.60	5,799.60	0.00	5,799.60	5,799.60	0.00	5,799.60	5,799.60	0.00
Collected	5,799.60	5,799.60	0.00	5,799.60	5,799.60	0.00	5,799.60	5,799.60	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

	Total	***Fees***	***Costs***
WIP Balance	***1,127.70***	***1,127.70***	***0.00***
AR Balance	***0.00***	***0.00***	***0.00***
Unalloc Payment	***0.00***		
Client Trust Balance	***0.00***		

Billing Address

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

05/09/25 14:30:46 PROFORMA STATEMENT FOR MATTER 395887.00005 (Krista Freitag, as Receiver for Superior) (Operations & Asset Sales)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted)
Matter #: 395887.00005
Client Name: Krista Freitag, as Receiver for Superior
Date of Last Billing:
Matter Name: Operations & Asset Sales
Proforma Number: 1337415
Client/Matter Joint Group # 395887.1
Client Matter Number:

Fees for Matter 395887.00005.(Operations & Asset Sales)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
01/27/25	9928485	Communications with G. Rodriguez regarding termination of contract and services provided by vendor Array	Fates, Edward (Ted)	0.30	241.65	241.65	WO	HD	TR	____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.30	805.50	241.65
		0.30		$241.65
Subtotal Fees				$241.65
Discount				0.00
Total Fees				241.65
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic) no text editing; copies @ .10

Account Summary – As Of 05/09/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	241.65	241.65	0.00	241.65	241.65	0.00	241.65	241.65	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

	Total	***Fees***	***Costs***
WIP Balance	***241.65***	***241.65***	***0.00***
AR Balance	***0.00***	***0.00***	***0.00***
Unalloc Payment	***0.00***		
Client Trust Balance	***0.00***		

Billing Address

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

05/09/25 14:30:47 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: 02/21/25
Matter Name: Claims & Distributions
Proforma Number: 1337415
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			
01/13/25	9910340	Communications with Receiver and G. Rodriguez about claims from unpaid vendors (.6) call/emails with Caldwell and counsel for Caldwell re: same (.7) communications from unpaid vendor (.1) analyze contract for unpaid vendor (.2)	Fates, Edward (Ted)	1.60	1,288.80	1,288.80	WO	HD	TR	____
01/15/25	9914274	Assist Receiver in responding to emails and inquires from vendors and former employees	Fates, Edward (Ted)	0.30	241.65	1,530.45	WO	HD	TR	____
01/21/25	9920484	Assist Receiver in responding to inquiries from customers and former employees	Fates, Edward (Ted)	0.40	322.20	1,852.65	WO	HD	TR	____
03/21/25	9995745	Assist Receiver in addressing inquiries from customer of Superior / SPC	Fates, Edward (Ted)	0.40	322.20	2,174.85	WO	HD	TR	____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.70	805.50	2,174.85
		2.70		$2,174.85

05/09/25 14:30:47 PROFORMA STATEMENT FOR MATTER 395887.00006 (Krista Freitag, as Receiver for Superior) (Claims & Distributions)

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
Subtotal Fees				$2,174.85
Discount				0.00
Total Fees				2,174.85
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic) no text editing; copies @ .10

Account Summary – As Of 05/09/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	6,121.80	6,121.80	0.00	2,174.85	2,174.85	0.00	6,121.80	6,121.80	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	3,946.95	3,946.95	0.00	3,946.95	3,946.95	0.00	3,946.95	3,946.95	0.00
Collected	3,946.95	3,946.95	0.00	3,946.95	3,946.95	0.00	3,946.95	3,946.95	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

	Total	***Fees***	***Costs***
WIP Balance	***2,174.85***	***2,174.85***	***0.00***
AR Balance	***0.00***	***0.00***	***0.00***
Unalloc Payment	***0.00***		
Client Trust Balance	***0.00***		

Billing Address

Krista Freitag, as Receiver for Superior Servicing LLC

Krista L. Freitag
kfreitag@ethreeadvisors.com
E3 Advisors
355 South Grand Avenue, Suite 2450
Los Angeles, CA 90071

05/09/25 14:30:48 PROFORMA STATEMENT FOR MATTER 395887.00009 (Krista Freitag, as Receiver for Superior) (Employment/Fees)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted)
Matter #: 395887.00009
Client Name: Krista Freitag, as Receiver for Superior
Date of Last Billing:
Matter Name: Employment/Fees
Proforma Number: 1337415
Client/Matter Joint Group # 395887.1
Client Matter Number:

Fees for Matter 395887.00009.(Employment/Fees)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
01/16/25	9915769	Assist Receiver with revisions to first interim fee application	Fates, Edward (Ted)	0.60	483.30	483.30	WO	HD	TR	____
01/17/25	9916531	Meet and confer communications with counsel for FTC regarding first interim fee applications	Fates, Edward (Ted)	0.40	322.20	805.50	WO	HD	TR	____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.00	805.50	805.50
		1.00		$805.50
Subtotal Fees				$805.50
Discount				0.00
Total Fees				805.50
Total Disbursements				0.00

Attorney Billing Instructions

(} BILL ALL
(} BILL FEES ONLY
(} BILL COST ONLY
(} Hold
(} Write Off
(} Transfer All ______________________

05/09/25 14:30:48 PROFORMA STATEMENT FOR MATTER 395887.00009 (Krista Freitag, as Receiver for Superior) (Employment/Fees)

Billing Instructions

expires 6/30/2026: 10% off standard rates (automatic) no text editing; copies @ .10

Account Summary – As Of 05/09/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	805.50	805.50	0.00	805.50	805.50	0.00	805.50	805.50	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

	Total	***Fees***	***Costs***
WIP Balance	***805.50***	***805.50***	***0.00***
AR Balance	***0.00***	***0.00***	***0.00***
Unalloc Payment	***0.00***		
Client Trust Balance	***0.00***		

Billing Address

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