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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

THIRD 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 Third Interim Application for Payment of Fees and Reimbursement of Expenses ("Application"). This Application covers the period from April 1, 2025 through June 30, 2025 (the "Application Period"), and seeks approval of $62,115.30 in fees and $9,515.37 in expenses, and an order authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred ($49,692.24) and 100% of the expenses incurred ($9,515.37).

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 $62,115.30 in fees for a total of 92.90 hours worked, and payment on an interim basis of 80% of that amount, or $49,692.24. 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	7.50	$6,041.25
Asset Investigation & Recovery	83.30	$54,382.50
Reporting	2.10	$1,691.55
Total Fees	92.90	$62,115.30

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

[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.

and protect the value of receivership estate assets. Therefore, the firm 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 regarding issues relating to financial disclosures, turnover of records and data, and potential settlements/stipulated judgments between the FTC and Defendants Caldwell, Hernandez and Merdjanian, including the potential turnover of assets to the Receiver pursuant to those stipulated judgments. The firm also assisted the Receiver with issues relating to the FTC's motion for a default judgment to be entered against certain entities in receivership. The reasonable and necessary fees for Allen Matkins' work in this category total $6,041.25.

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 more than 40 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.

This large-scale document gathering project was critical for the Receiver's forensic accounting of funds that flowed into and out of the enterprise, identification of assets and potentially recoverable transfers and amounts, analysis of various unusual and suspicious transactions involving the defendants and certain relatives, friends and third parties, and evaluation of potential claims against third parties.

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. The majority of the subpoena and document management work was performed by an experienced paralegal at a discounted hourly rate of $391.50.

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 $54,382.50.

3. Reporting

Allen Matkins' limited time in this category during the Application Period was focused on assisting the Receiver with her Second Interim Report, which was filed on May 9, 2025. Dkt. 69. The reasonable and necessary fees for Allen Matkins' work in this category total $1,691.55.

B. Summary of Expenses Requested for Reimbursement

Allen Matkins requests that the Court approve reimbursement of $9,515.37 in out-of-pocket costs. The itemization of such expenses is summarized below by billing category.

Category	**Total**
Messenger/FedEx Fees	$48.32
Service of Process (numerous subpoenas)	$8,667.10
Court/Filing Fees	$753.70
Subpoenaed Documents	$46.25
Total Costs	$9,515.37

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 1.10 hours of time ($886.05 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 $62,115.30;

2. Authorizing and directing the Receiver to pay 80% of approved fees, or $49,692.24, from the assets of the Receivership Entities;

3. Approving Allen Matkins' costs in the amount of $9,515.37, 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: March 11, 2026

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 March 12, 2026, 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):

THIRD 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
- **Reid Abram Tepfer**
  rtepfer@ftc.gov
- **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

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

Executed on March 12, 2026, 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	12-43

EXHIBIT A

Allen Matkins Leck Gamble Mallory & Natsis LLP Billing Entries

09/16/25 14:03:26 PROFORMA STATEMENT FOR MATTER 395887.00002 (Krista Freitag, as Receiver for Superior) (General Receivership)

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: 1361511
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			
04/15/25	10028252	Communications with counsel for FTC regarding service of First Amended Complaint on receivership entities (.1) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.20	161.10	161.10	WO	HD	TR	____
05/08/25	10059888	Analyze motion for entry of default as to defendant receivership entities and advise Receiver re: same	Fates, Edward (Ted)	0.20	161.10	322.20	WO	HD	TR	____
06/03/25	10094653	Analyze proposed stipulated orders as to Caldwell and Hernandez from FTC counsel (1.1) discuss and advise Receiver re: same (.5)	Fates, Edward (Ted)	1.60	1,288.80	1,611.00	WO	HD	TR	____
06/04/25	10095995	Communications with Receiver and FTC counsel re: language of proposed stipulated orders for Caldwell and Hernandez	Fates, Edward (Ted)	0.70	563.85	2,174.85	WO	HD	TR	____
06/06/25	10098224	Analyze communications from FTC counsel and issues relating to Hernandez rental property and mortgage thereon and Business Done Right payments to third parties (.6) communications with Receiver and FTC	Fates, Edward (Ted)	3.50	2,819.25	4,994.10	WO	HD	TR	____

Fees for Matter 395887.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		counsel re: same (.9) analyze revised draft of proposed stipulated orders from FTC counsel (.5) discuss same with Receiver (.6) analyze lease for Hernandez rental property and mortgage statement (.5) prepare and send suggested revisions to proposed stipulated orders to FTC counsel (.4)								
06/10/25	10103592	Call with Receiver and FTC counsel regarding potential FTC settlements with Caldwell and Hernandez, including issues relating to potential turnover of assets to Receiver	Fates, Edward (Ted)	0.60	483.30	5,477.40	WO	HD	TR	____
06/12/25	10106219	Analyze and advise Receiver on questions from FTC counsel relating to Hernandez pension / retirement account issues	Fates, Edward (Ted)	0.40	322.20	5,799.60	WO	HD	TR	____
06/30/25	10129114	Analyze emails from Caldwell and counsel for Caldwell regarding post-TRO payment process activity and issues relating to same (.2) discuss same with Receiver (.1)	Fates, Edward (Ted)	0.30	241.65	6,041.25	WO	HD	TR	____

Disbursements for Matter 395887.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
04/11/25	2936345	POS – Service of Process - Nationwide Legal LLC -PAYMENT AUTOMATION NETWORK INC.,SUBPOENA	0.00	229.20	WO	HD	TR	____
04/11/25	2936346	POS – Service of Process - Nationwide Legal LLC - PAYLIANCE c/o Colllections Acquisition Company, Inc., dba Payliance - Agent CSC-Lawyers Incorporating	0.00	163.20	WO	HD	TR	____

Disbursements for Matter 395887.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt			
		Service,SUBPOENA					
04/11/25	2936347	POS – Service of Process - Nationwide Legal LLC - PAYLIANCE AKA PAYLIANCE CARD SERVICES C/O SPECIAL VENTURES LLC. AGENT: RUBY J. TIDWELL,SUBPOENA	0.00	163.20	WO	HD	TR
04/11/25	2936348	POS – Service of Process - Nationwide Legal LLC -PAYMENT AUTOMATION NETWORK INC. C/O DARREL JARVIS,SUBPOENA	0.00	216.20	WO	HD	TR
04/11/25	2936349	POS – Service of Process - Nationwide Legal LLC -PAYMENT AUTOMATION NETWORK INC., c/o Anderson Registered Agents,SUBPOENA	0.00	216.20	WO	HD	TR
04/11/25	2936350	POS – Service of Process - Nationwide Legal LLC -Payliance c/o Collections Acquisition Company, Inc., dba Payliance - Agent Corporation Service Company,SUBPOENA	0.00	216.20	WO	HD	TR
04/14/25	2930966	POS – Nationwide Legal, LLC - ACH.COM c/o Priority Technology Holdings, Subpoena	0.00	210.90	WO	HD	TR
04/18/25	2943863	ADV – Bank of America - Production of Documents	0.00	46.25	WO	HD	TR
04/22/25	2937309	DCSRCH – Allen Matkins - San Diego; CERTIFIED COPY PRELIMINARY INJUNCTION FILED 12/19/24; Advance $18.00	0.00	150.50	WO	HD	TR
04/23/25	2933852	MSNGR – Federal Express - Ship To: Ted Fates - Allen Matkins Leck Gamble Mall	0.00	25.57	WO	HD	TR
04/24/25	2937310	MSNGR – Messenger - First Legal LLC - FIRST LEGAL; Preliminary Injunction	0.00	22.75	WO	HD	TR
04/24/25	2937311	FILING – Filing Fees - First Legal LLC - ORANGE CO. RECORDER; Preliminary Injunction	0.00	89.75	WO	HD	TR
04/25/25	2936297	POS – Service of Process - Nationwide Legal LLC -JPMorgan Chase Bank, National Association,SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	62.50	WO	HD	TR
04/25/25	2936298	POS – Service of Process - Nationwide Legal LLC -Premier Trust, Inc,SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	320.40	WO	HD	TR

Disbursements for Matter 395887.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
04/25/25	2936299	POS – Service of Process - Nationwide Legal LLC -U.S. Bancorp,SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	62.50	WO	HD	TR	
04/25/25	2936300	POS – Service of Process - Nationwide Legal LLC -Comerica Bank,SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	210.90	WO	HD	TR	
04/25/25	2936301	POS – Service of Process - Nationwide Legal LLC -The Charles Schwab Corporation,SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	63.10	WO	HD	TR	
04/25/25	2936302	POS – Service of Process - Nationwide Legal LLC -Ally Financial Inc.,SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	194.00	WO	HD	TR	
04/25/25	2936303	POS – Service of Process - Nationwide Legal LLC -Farmers & Merchants Bank of Long Beach,SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	230.40	WO	HD	TR	
04/28/25	2937313	MSNGR – Messenger - First Legal LLC - FIRST LEGAL; PRELIMINARY INJUNCTION	0.00	22.75	WO	HD	TR	
04/28/25	2937314	FILING – Filing Fees - First Legal LLC - ORANGE CO. RECORDER; PRELIMINARY INJUNCTION	0.00	89.75	WO	HD	TR	
04/29/25	2937315	FILING – Filing Fees - First Legal LLC - ORANGE CO. RECORDER; PRELIMINARY INJUNCTION; Advance $261.00	0.00	300.95	WO	HD	TR	
05/02/25	2935849	POS – Nationwide Legal, LLC - ACH.COM c/o Priority Technology Holdings, Inc., SUBPOENA	0.00	163.20	WO	HD	TR	
05/05/25	2935847	POS – Nationwide Legal, LLC - Wells Fargo Bank, National Association, c/o Corporation Service Company dba CSC - Lawyers Incorporating Service, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	210.90	WO	HD	TR	
05/05/25	2935848	POS – Nationwide Lega, LLC - U.S. BANK NATIONAL ASSOCIATION DBA U.S. BANK, SUBPOENA	0.00	116.20	WO	HD	TR	

Disbursements for Matter 395887.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
06/04/25	2939870	POS – Nationwide Legal, LLC - Ally Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	210.90	WO	HD	TR	
06/10/25	2939871	POS – Nationwide Legal, LLC - Ameris Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	163.80	WO	HD	TR	
06/24/25	2944780	POS – Nationwide Legal, LLC - P&I Forever Corp., SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES	0.00	417.60	WO	HD	TR	
06/24/25	2944781	POS – Nationwide Legal, LLC - BetterLife, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES	0.00	242.70	WO	HD	TR	
06/24/25	2945718	POS – Service of Process - Nationwide Legal LLC - WFG National Title Company, c/o CSC - Lawyers Incorporating ServiceSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	210.90	WO	HD	TR	
06/24/25	2945719	POS – Service of Process - Nationwide Legal LLC - CFTPay (aka Priority Payment Systems, LLC, and/or Priority Technology Holdings, Inc.) c/o C T Corporation SystemsSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	62.50	WO	HD	TR	
06/24/25	2945720	POS – Service of Process - Nationwide Legal LLC - Crossroads Financial Technologies, c/o National Registered Agents/ C T Corporation SystemSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	210.90	WO	HD	TR	
06/24/25	2945721	POS – Service of Process - Nationwide Legal LLC - Edward D. Jones & Co., L.P., c/o C T Corporation SystemSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	62.50	WO	HD	TR	
06/24/25	2945722	POS – Service of Process - Nationwide Legal LLC - Metro Point, Inc. c/o Cogency Global Inc.SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO	0.00	210.90	WO	HD	TR	

Disbursements for Matter 395887.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt			
06/24/25	2945723	PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION POS – Service of Process - Nationwide Legal LLC - Bhindi Jewlers Glendale, Inc. c/o Vinod K. BhindiSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	210.90	WO	HD	TR
06/24/25	2945724	POS – Service of Process - Nationwide Legal LLC - Payan Surveying, Inc. c/o Atanacio PayanSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	210.90	WO	HD	TR
06/24/25	2945725	POS – Service of Process - Nationwide Legal LLC - Precise Escrow, c/o James HeSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	210.90	WO	HD	TR
06/24/25	2945726	POS – Service of Process - Nationwide Legal LLC - TGR Geotechnical, Inc. c/o Sanjay GovilSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	210.90	WO	HD	TR
06/24/25	2945727	POS – Service of Process - Nationwide Legal LLC - Glenn A. Rick Engineering and Development Co. c/o Dennis J. StrykerSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	134.20	WO	HD	TR
06/24/25	2945728	POS – Service of Process - Nationwide Legal LLC - L'Amor Jewelry, Inc. c/o Kourosh ZoghiSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	210.90	WO	HD	TR
06/24/25	2945729	POS – Service of Process - Nationwide Legal LLC - Lake Michigan Credit UnionSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	242.70	WO	HD	TR
06/24/25	2945730	POS – Service of Process - Nationwide Legal LLC - Azac Construction, Inc. c/o Edward SalleeSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	210.90	WO	HD	TR
06/24/25	2945731	POS – Service of Process - Nationwide Legal LLC - Better Life Plans, LLC, c/o C T Corporation SystemSUBPOENA TO	0.00	62.50	WO	HD	TR

Disbursements for Matter 395887.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt			
06/24/25	2945732	PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION POS – Service of Process - Nationwide Legal LLC - TBG LLC, c/o Rahul BhagatSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	417.60	WO	HD	TR
06/24/25	2950459	POS – Nationwide Legal, LLC - Huy Nguyen, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	831.00	WO	HD	TR
06/24/25	2951195	POS – Service of Process - Nationwide Legal LLC - Start New Settlement, LLC (fka Start New Financial, LLC, and/or Start New Financial, LLC) c/o Vellichor Law PLCSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	242.70	WO	HD	TR
06/24/25	2951196	POS – Service of Process - Nationwide Legal LLC - Echelon Music Group L.L.C. c/o Eric StengerSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	418.20	WO	HD	TR
06/24/25	2951197	POS – Service of Process - Nationwide Legal LLC - Lenvious LLC, c/o Phillip VasquezSUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	210.90	WO	HD	TR
06/29/25	2944369	COURT – Other Court Charges - Edward (Ted) Fates - SERVEPORT.COM - Fees for subpoenaed records	0.00	100.00	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	7.50	805.50	6,041.25
		7.50		$6,041.25
Subtotal Fees				$6,041.25
Discount				0.00
Total Fees				6,041.25
Total Disbursements				9,515.37

Attorney Billing Instructions

09/16/25 14:03:26 PROFORMA STATEMENT FOR MATTER 395887.00002 (Krista Freitag, as Receiver for Superior) (General Receivership)

( )	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 09/16/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	12,269.30	12,097.80	171.50	32,294.82	22,779.45	9,515.37	72,983.41	62,571.15	10,412.26
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	40,688.59	39,791.70	896.89	39,791.70	39,791.70	896.89
Collected	0.00	0.00	0.00	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	***36,144.26***	***22,779.45***	***13,364.81***
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

09/16/25 14:03:26 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: 1361511
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			
04/01/25	10018269	Email correspondence with Redstone's counsel and Xactus's counsel regarding outstanding turnover issues (0.2); Email correspondence with Geno Rodriguez regarding update on Redstone account access (0.1)	Pham, Matt D.	0.30	194.40	194.40	WO	HD	TR	____
04/07/25	10019664	Communications with Bank of America regarding document production in response to subpoena	Fates, Edward (Ted)	0.20	161.10	355.50	WO	HD	TR	____
04/09/25	10022354	Communications with Receiver and Bank of America re: additional accounts located and document production	Fates, Edward (Ted)	0.30	241.65	597.15	WO	HD	TR	____
04/10/25	10022453	Call with Receiver and counsel for FTC regarding accounting work and analysis (.8) follow up communications with Receiver re: same (.3) communications with L. Ryan regarding subpoena to EPX (.3) advise on next steps re: subpoena and revisions to same (.4) communications with insurance carrier regarding employee dishonesty claims	Fates, Edward (Ted)	2.70	2,174.85	2,772.00	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		under Superior and Accredit policies (.4) advise Receiver re: same (.2) communications with Bank of America regarding further document production (.3)								
04/10/25	10022786	Review communications regarding NorthAB/EPX, as well as EIN and personal information (.1); research regarding entity information to effect service of Subpoena (.3); draft and revise Subpoena and requests for production of documents (.3); communications with O. Moss (NorthAB) regarding accepting service of Subpoena (.1).	Pendleton, Michelle	0.90	352.35	3,124.35	WO	HD	TR	____
04/11/25	10023498	Communications with L. Ryan regarding subpoenas to payment processors (.2) revise and advise on next steps for same (.5) further communications with Hartford Insurance regarding employee dishonesty claims (1.2) analyze coverage issues and discuss same with Receiver and G. Rodriguez (.8) further communications with Receiver and Bank of America regarding newly discovered accounts (.5)	Fates, Edward (Ted)	3.20	2,577.60	5,701.95	WO	HD	TR	____
04/11/25	10023884	Review additional payment processing information from L. Ryan (.1); research online regarding entity status and service of process (.4); draft 6 Subpoenas relating to Payliance and Payment Automation Network and their related entities (.3); draft document requests to	Pendleton, Michelle	1.30	508.95	6,210.90	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		each (.4); communications with T. Fates regarding the same (.1).								
04/14/25	10025317	Advise on additional subpoena to payment processor (.3) work on employee dishonesty claim and discuss same with Receiver (.8) discuss strategy for potential company assets controlled by Caldwell and Hernandez and recovery efforts with Receiver (.4) advise Receiver re: contact info for Caldwell and Hernandez from service waivers (.1)	Fates, Edward (Ted)	1.60	1,288.80	7,499.70	WO	HD	TR	____
04/14/25	10025679	Research regarding entity status and affiliations; draft Subpoena for records and requests for documents to ACH.com; communications with T. Fates.	Pendleton, Michelle	0.60	234.90	7,734.60	WO	HD	TR	____
04/15/25	10028351	Communications with insurance carrier regarding employee dishonesty claim for Accredit	Fates, Edward (Ted)	0.30	241.65	7,976.25	WO	HD	TR	____
04/16/25	10029464	Call / emails with Receiver and FTC counsel regarding frozen balances in receivership entity accounts, forensic accounting analysis, and potential additional receivership entity assets (.8) discuss filing and recording of receivership order with Receiver (.3)	Fates, Edward (Ted)	1.10	886.05	8,862.30	WO	HD	TR	____
04/17/25	10030885	Discuss forensic accounting analysis and approach / strategy for potential company asset investigation with Receiver (.6) analyze terms of outstanding Business Done Right loan to	Fates, Edward (Ted)	1.40	1,127.70	9,990.00	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		E. Youssef (.4) analyze issues relating to possible withdrawals from frozen accounts and discuss same with Receiver (.4)								
04/18/25	10032126	Work on insurance claim form requested by Hartford (.4) communications with Hartford rep re: same (.3)	Fates, Edward (Ted)	0.70	563.85	10,553.85	WO	HD	TR	____
04/21/25	10034748	Call with Receiver and FTC counsel to discuss forensic accounting issues and potential asset investigation and recovery (1.0) advise on Bank of America document production issues (.3) discuss asset investigation issues with Receiver (.5)	Fates, Edward (Ted)	1.80	1,449.90	12,003.75	WO	HD	TR	____
04/22/25	10036663	Discuss investigative steps re: potential real property assets and strategy for same with Receiver (.4) communications with Bank of America re: document production (.3) advise on recording of PI Order as to Santa Ana property (.4) analyze report from investigator (.2)	Fates, Edward (Ted)	1.30	1,047.15	13,050.90	WO	HD	TR	____
04/23/25	10038066	Communications Receiver and with L. Ryan regarding additional bank subpoenas for records necessary for forensic accounting work (.8) advise on next steps re: same (.4)	Fates, Edward (Ted)	1.20	966.60	14,017.50	WO	HD	TR	____
04/23/25	10038363	Review additional financial information from receiver and draft summary of accounts (.3); research regarding entity status to effect service (.7); draft Subpoenas and requests for documents	Pendleton, Michelle	1.80	704.70	14,722.20	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		to Chase Bank, Comerica Bank, U.S. Bancorp, Charles Schwab, Farmers & Merchants Bank, Premier Trust, and Ally Bank (.8).								
04/25/25	10040783	Advise on issues relating to recording of receivership order as to real property owned by receivership entity	Fates, Edward (Ted)	0.40	322.20	15,044.40	WO	HD	TR	____
04/25/25	10042259	Review and respond to emails and forward example of previously recorded receivership order.	Kaup, John	0.30	117.45	15,161.85	WO	HD	TR	____
04/28/25	10042756	Review and analyze current acknowledgement language; draft introductory portion of submission of Preliminary Injunction Order to the Orange County Recorder; obtain notary Acknowledgment; communications with T. Fates.	Pendleton, Michelle	0.60	234.90	15,396.75	WO	HD	TR	____
04/29/25	10045184	Analyze information from Receiver regarding Business Done Right property in Santa Ana and related issues (.6) analyze and respond to requests from insurance carrier regarding pending employee dishonesty claims, analyze reservation of rights letters (.9) communications with counsel for PAN re: pending subpoena (.4) advise on subpoena service issues for ACH.com (.2)	Fates, Edward (Ted)	2.10	1,691.55	17,088.30	WO	HD	TR	____
04/29/25	10045655	Draft correspondence to L. Ryan regarding status of Subpoena to Payliance.	Pendleton, Michelle	0.10	39.15	17,127.45	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
04/29/25	10046636	Review recorded copy of preliminary injunction order.	Kaup, John	0.10	39.15	17,166.60	WO	HD	TR	____
04/30/25	10046862	Call from Comerica bank regarding subpoena for records and deadline for production	Fates, Edward (Ted)	0.20	161.10	17,327.70	WO	HD	TR	____
05/01/25	10052665	Research online regarding business entities and formation issues for ACH.com and Priority Technology Holdings in light of agent's refusal to accept service (.2); communications with T. Fates (.1); draft revised Subpoena and instructions for updated service attempt to ACH.com (.2).	Pendleton, Michelle	0.50	195.75	17,523.45	WO	HD	TR	____
05/01/25	10052842	Advise on service issues for ACH.com subpoena	Fates, Edward (Ted)	0.20	161.10	17,684.55	WO	HD	TR	____
05/02/25	10053569	Analyze communications from L. Ryan and advise on approach regarding outstanding bank subpoenas (.4)	Fates, Edward (Ted)	0.40	322.20	18,006.75	WO	HD	TR	____
05/02/25	10053614	Review communications regarding counsel for Payliance (.1); draft correspondence to D. McDowell (.3).	Pendleton, Michelle	0.40	156.60	18,163.35	WO	HD	TR	____
05/05/25	10054852	Analyze and advise on subpoena response from Ally Bank and service issues for US Bank (.4) advise on subpoena to Wells Fargo (.2) communications with counsel for PAN regarding subpoena production (.3) discuss forensic accounting and investigation issues with Receiver (.3)	Fates, Edward (Ted)	1.20	966.60	19,129.95	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
05/05/25	10054858	Review and analyze correspondence from U.S. Bancorp regarding objection to service (.1); research regarding the entities indicated (.2); revise Subpoena for records for U.S. Bank National Association dba U.S. Bank (.2); draft correspondence to K. Lau regarding additional account information for responding to Subpoena to Comerica Bank (.2); draft Subpoena and request for documents to Wells Fargo Bank (.3); communications with T. Fates and W. Lee (Chase Bank) (.2); draft correspondence to L. Ryan regarding status of Subpoenas (.2).	Pendleton, Michelle	1.40	548.10	19,678.05	WO	HD	TR	____
05/06/25	10057142	Advise on next steps re: pending subpoenas for documents issued to JP Morgan Chase and Wells Fargo	Fates, Edward (Ted)	0.30	241.65	19,919.70	WO	HD	TR	____
05/08/25	10059932	Call with Receiver and FTC counsel regarding preliminary forensic accounting analysis (.5) advise on responses to bank subpoenas (.2)	Fates, Edward (Ted)	0.70	563.85	20,483.55	WO	HD	TR	____
05/09/25	10060895	Communications to Wells Fargo Bank regarding Subpoena (.1); communications with Chase Bank regarding providing full identifying information and request for extension of time to respond to Subpoena (.2); communications with Premier Trust regarding long-dormant account and transfer to Trustee, in response to Subpoena (.2); review and respond to	Pendleton, Michelle	0.90	352.35	20,835.90	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		correspondence from O. Moss regarding meet and confer to North AB/EPX as to lack of response to Subpoena (.2); draft correspondence to Chase Bank regarding requested information to respond to Subpoena (.2)								
05/09/25	10060897	Advise on next steps and follow-up for outstanding subpoenas	Fates, Edward (Ted)	0.10	80.55	20,916.45	WO	HD	TR	____
05/12/25	10063528	Discuss forensic accounting and asset investigation issues with Receiver	Fates, Edward (Ted)	0.10	80.55	20,997.00	WO	HD	TR	____
05/13/25	10065694	Analyze and revise draft forensic accounting report and exhibits from Receiver (1.6) discuss same with Receiver (.2) communications with Schwab regarding document production in response to subpoena (.3) analyze issues and advise Receiver on approach for potential additional receivership entity (.4)	Fates, Edward (Ted)	2.50	2,013.75	23,010.75	WO	HD	TR	____
05/13/25	10066088	Review and analyze communications from Charles Schwab and Chase regarding Subpoenaed records (.2); review and process Charles Schwab account documents (.1); draft index of the same (.3); draft correspondence to L. Ryan and K. Freitag (.2).	Pendleton, Michelle	0.80	313.20	23,323.95	WO	HD	TR	____
05/14/25	10066810	Analyze and discuss potential receivership entity and asset recovery issues and strategy with Receiver (.8) call with Receiver and FTC counsel regarding asset investigation and	Fates, Edward (Ted)	2.40	1,933.20	25,257.15	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		accounting issues (.9) discuss Schwab account recovery issues and service of order with Receiver (.4) advise on accounting detail requested by FTC (.3)								
05/15/25	10069057	Analyze response to PI Order from Schwab re: restricted accounts for Business Done Right (.4) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.60	483.30	25,740.45	WO	HD	TR	____
05/16/25	10069428	Analyze and advise Receiver on issues relating to employee dishonesty insurance claims (.8) analyze letter and information from G. Rodriguez relating to Business Done Right property, purported secured loan, and unpaid property taxes (.5)	Fates, Edward (Ted)	1.30	1,047.15	26,787.60	WO	HD	TR	____
05/19/25	10072499	Discuss issues relating to real property owned by Business Done Right with Receiver (.2) advise Receiver on issues relating to recover of emails and attachments from tax accounting firm (.2) discuss next steps for Schwab accounts with Receiver (.3) advise on document production issues for bank subpoena (.2)	Fates, Edward (Ted)	0.90	724.95	27,512.55	WO	HD	TR	____
05/19/25	10073233	Communications with T. Fates and T. Ferretti regarding Farmers & Merchants response to Subpoena (.2); review and analyze correspondence and trust documents from H. St. John (Premier Trust) in response to Subpoena (.1); draft summary of Subpoena status (.2); draft correspondence to L. Ryan and K. Freitag regarding status update (.2).	Pendleton, Michelle	0.70	274.05	27,786.60	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
05/20/25	10074242	Draft correspondence to L. Ryan and K. Freitag regarding production by Farmers & Merchants Bank (.2); create share file link of production (.1); draft summary of productions regarding custodian information (.1); review and respond to correspondence from O. Moss (North AB) (.1); review and process records from Payment Automation Network (.2); draft brief summary of the same (.4); draft correspondence to L. Ryan and K. Freitag regarding the same (.1).	Pendleton, Michelle	1.20	469.80	28,256.40	WO	HD	TR	____
05/20/25	10074425	Communications with North and counsel for PAN re: document productions (.3) asset investigation steps relating to receivership entities formerly under Caldwell control (.4) communications with counsel for Caldwell re: Zoom meeting (.3)	Fates, Edward (Ted)	1.00	805.50	29,061.90	WO	HD	TR	____
05/21/25	10075585	Communications with Wells Fargo Bank regarding objection to Subpoena (.2); review and process records from NorthAB/EPX in response to Subpoena (.2); draft brief summary of the same and potential new information (.3); draft correspondence and share file link to L. Ryan and K. Freitag (.2).	Pendleton, Michelle	0.80	313.20	29,375.10	WO	HD	TR	____
05/21/25	10076368	Discuss forensic accounting and bank subpoena issues with Receiver (.3) advise Receiver on issues re: production of emails and attachments by accounting firm (.4)	Fates, Edward (Ted)	0.70	563.85	29,938.95	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
05/22/25	10077388	Communications with Vanessa (Wells Fargo Bank) regarding production and extension of time to respond to Subpoena (.2); review correspondence, hard copies, and CDs from US Bank (.1); communications with T. Fates regarding productions (.1).	Pendleton, Michelle	0.40	156.60	30,095.55	WO	HD	TR	____
05/22/25	10077882	Advise Receiver on issues relating to real property owned by Business Done Right (.2) follow up communications to counsel for Caldwell (.1) discuss Hernandez issues with Receiver (.1)	Fates, Edward (Ted)	0.40	322.20	30,417.75	WO	HD	TR	____
05/23/25	10078728	Discuss issues and strategy regarding forensic accounting, real property, attempts to get information from Caldwell and Hernandez and related issues with Receiver (.9) communications with counsel for FTC re: same (.4) communications with Parkside Estates re: issues relating to Business Done Right property and stay of actions (.6)	Fates, Edward (Ted)	1.90	1,530.45	31,948.20	WO	HD	TR	____
05/23/25	10079170	Communications with US Bank regarding passwords to access CDs (.2); review and process CDs and scanned hard copy documents from US Bank (.6); analyze statements and signature cards for accounts provided via hard copy (.3); draft brief summary of the same (.5); communications with T. Fates regarding newly identified entities and individuals (.2)	Pendleton, Michelle	1.80	704.70	32,652.90	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
05/27/25	10082096	Review and analyze US Bank password-protected records (.7); draft category and relevance summary, including summary of newly-identified entities, individuals, and financial institutions (.9); draft correspondence to L. Ryan and K. Freitag (.2); create share file link for transmission of records (.1).	Pendleton, Michelle	1.90	743.85	33,396.75	WO	HD	TR	____
05/27/25	10082267	Communications with Receiver and FTC counsel re: meetings with Caldwell and Hernandez (.3) email to counsel for Caldwell re scheduling of meeting (.1)	Fates, Edward (Ted)	0.40	322.20	33,718.95	WO	HD	TR	____
05/28/25	10084020	Communications with FTC and counsel for Caldwell re: 5/30 meeting (.3) call with Receiver and FTC counsel re: accounting and asset analysis issues (.8) call with T. Chou / Parkside Estates regarding issues relating to Santa Ana property (.7) discuss same with Receiver (.3) communications with Hernandez, Receiver, and FTC counsel re: 5/30 meeting (.2)	Fates, Edward (Ted)	2.30	1,852.65	35,571.60	WO	HD	TR	____
05/29/25	10086285	Review and process secure messages and production from Wells Fargo Bank in response to Subpoena (.3); analyze production and draft category summary of the same (including newly-identified individuals, entities, and accounts) (1).	Pendleton, Michelle	1.30	508.95	36,080.55	WO	HD	TR	____
05/29/25	10086647	Analyze email from Parkside Estates (.2) discuss same with Receiver (.2) respond to same (.3) advise Receiver and G. Rodriguez on issues relating to	Fates, Edward (Ted)	1.30	1,047.15	37,127.70	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		employee dishonesty insurance claim (.2) discuss plan and approach to meeting with Caldwell with Receiver (.4)								
05/30/25	10088897	Analyze purchase contract and related documents for Business Done Right purchase of Bent Tree property in Santa Ana (.7) discuss same with Receiver (.4) call with Receiver, Caldwell and FTC counsel regarding assets and transfers relating to receivership entities (1.6) discuss next steps with Receiver (.2) call with Receiver, Hernandez and FTC counsel regarding assets and transfers relating to receivership entities (.9) discuss next steps with Receiver (.4) communications with G. Rodriguez and Hartford insurance re: employee dishonesty claim (.3)	Fates, Edward (Ted)	4.50	3,624.75	40,752.45	WO	HD	TR	____
06/02/25	10093191	Follow-up communications with Receiver, FTC counsel, Hernandez and Chou regarding information and documents requested during meetings (.4) analyze emails and documents from E. Caldwell and D. Hernandez (.5) discuss forensic accounting issues and report in same with Receiver (.5)	Fates, Edward (Ted)	1.40	1,127.70	41,880.15	WO	HD	TR	____
06/03/25	10094741	Analyze brokerage account info from Receiver (.2) call with Receiver and FTC counsel to discuss receivership entity asset investigation and recovery issues (.8) advise on additional bank subpoenas (.2) communications with Receiver and counsel for Caldwell	Fates, Edward (Ted)	1.70	1,369.35	43,249.50	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		regarding follow-up list of requests (.3) advise Receiver on request from FTC counsel and response to same (.2)								
06/03/25	10094774	Review and analyze remaining documents from Wells Fargo Bank (.5); draft category summary of the same (.5); draft correspondence to L. Ryan and K. Freitag (.2); communications with C. Pierce (JPMorgan Chase) regarding response to Subpoena (.1); draft Subpoenas with requests for documents to BMO Bank and Ally Bank per L. Ryan's email (.5)	Pendleton, Michelle	1.80	704.70	43,954.20	WO	HD	TR	____
06/04/25	10095994	Analyze Caldwell responses to follow-up questions (.4) analyze issues relating to recovery of engagement ring and wedding bands (.5) analyze emails and attachments relating to Bent Tree transaction (.6) discuss same with Receiver (.3)	Fates, Edward (Ted)	1.80	1,449.90	45,404.10	WO	HD	TR	____
06/05/25	10097200	Advise on issues relating to Chase document production pursuant to subpoena and subpoena issued to BMO Bank (.3) discuss approach to engagement ring / wedding band issue with Receiver (.2)	Fates, Edward (Ted)	0.50	402.75	45,806.85	WO	HD	TR	____
06/06/25	10098450	Communications with BMO Bank regarding pending subpoena for production of bank records (.2) advise on issues relating to subpoena for documents for additional bank account (.2)	Fates, Edward (Ted)	0.40	322.20	46,129.05	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
06/06/25	10098804	Review and respond to correspondence from K. Freitag regarding status of Subpoenaed records and further meet and confer efforts.	Pendleton, Michelle	0.30	117.45	46,246.50	WO	HD	TR	____
06/09/25	10100921	Advise on next steps relating Chase document production in response to subpoena and subpoena relating to Caldwell transfer (.2) discuss same and related asset investigation and accounting issues with Receiver (.7)	Fates, Edward (Ted)	0.90	724.95	46,971.45	WO	HD	TR	____
06/09/25	10102381	Review and analyze Wells Fargo records to determine location of deposit for check(s) to Eric Caldwell's mother (.4); review and analyze records from JPMorgan Chase in response to Subpoena (.2); draft brief summary of the same (.2); communications with T. Fates and K. Freitag (.2).	Pendleton, Michelle	1.00	391.50	47,362.95	WO	HD	TR	____
06/10/25	10103217	Review additional bank subpoena for records to be issued (.2) communications with Receiver re: anticipated net proceeds from Bryce property (.2)	Fates, Edward (Ted)	0.40	322.20	47,685.15	WO	HD	TR	____
06/10/25	10103226	Review and analyze Secretary of State records for entity status of Ameris and Atlantic Coast Banks (.1); draft Subpoena and requests for documents to Ameris Bank (.3); draft brief summary of information provided by Bank of America to receiver (.1); communications with T. Fates and K. Freitag regarding	Pendleton, Michelle	0.90	352.35	48,037.50	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		status of Subpoenas, potential meet and confer efforts with JPMorgan Chase, and supplemental requests to Bank of America (.4).								
06/11/25	10104893	Advise Receiver on issues relating to recovery and potential sale of BMW owned by ET&C Holdings	Fates, Edward (Ted)	0.30	241.65	48,279.15	WO	HD	TR	____
06/12/25	10105982	Advise on responses on subpoenas to banks and payment processors and approach to same	Fates, Edward (Ted)	0.20	161.10	48,440.25	WO	HD	TR	____
06/13/25	10106969	Advise Receiver on issues relating to the employee dishonesty insurance claim (.4) advise on subpoena production from Comerica Bank (.2) discuss further subpoenas relating to ET&C and Business Done Right with Receiver (.8) advise on next steps re: same (.3)	Fates, Edward (Ted)	1.70	1,369.35	49,809.60	WO	HD	TR	____
06/13/25	10110888	Review and respond to communications with L. Ryan, T. Fates, and K. Lau (Comerica Bank) (.4); review communications from K. Freitag regarding further discovery efforts to identify assets (.1).	Pendleton, Michelle	0.50	195.75	50,005.35	WO	HD	TR	____
06/16/25	10110903	Draft correspondence to Bank of America and NorthAB regarding supplemental production in response to Subpoena (.4); communications with Wells Fargo Bank regarding production of records for incorrect account holder (.3); draft correspondence to G. Hart (Ameris Bank) regarding response to	Pendleton, Michelle	2.50	978.75	50,984.10	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		Subpoena for records (.1); research regarding entity status and agents to effect code-compliant service of additional Subpoenas to approx. 21 entities and individuals (.6); begin drafting requests for documents to new entities, including financial institutions, individuals, insurers, and other businesses (1.1).								
06/17/25	10111762	Advise on document production from Comerica Bank and next steps re: same	Fates, Edward (Ted)	0.20	161.10	51,145.20	WO	HD	TR	____
06/17/25	10118158	Draft and revise approx. 21 requests for production to accompany Subpoenas to additional financial institutions, individuals, insurers, and other businesses (.6); communications with T. Fates (.1).	Pendleton, Michelle	0.70	274.05	51,419.25	WO	HD	TR	____
06/18/25	10113420	Review and respond to correspondence from A. Levy (Bank of America) (.1); draft summary of Subpoenas regarding request for extension (.1); review and analyze responses from U.S. Bank to Subpoenas to assist with follow up on unclaimed property (.1).	Pendleton, Michelle	0.30	117.45	51,536.70	WO	HD	TR	____
06/20/25	10115836	Communications with G. Hart (Ameris Bank) regarding production of records in response to Subpoena (.2); communications with L. Ryan regarding status of outstanding productions of records (.1).	Pendleton, Michelle	0.30	117.45	51,654.15	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
06/20/25	10116377	Analyze and edit subpoena requests for documents for series of document subpoenas to be issued	Fates, Edward (Ted)	0.60	483.30	52,137.45	WO	HD	TR	____
06/23/25	10119083	Prepare 21 Subpoenas for records to additional financial institutions, entities, and individuals identified by receiver (.8); draft status update regarding currently outstanding records Subpoenas to L. Ryan and K. Freitag (.3); review secure correspondence notice from BMO Bank (.1); review and process hard-copy records from Ally Bank in response to Subpoena (.2).	Pendleton, Michelle	1.40	548.10	52,685.55	WO	HD	TR	____
06/25/25	10121643	Review and process supplemental records from Bank of America responsive to Subpoena (.3); draft brief summary of the same (.2); communications with T. Fates, A. Levy, L. Ryan, and K. Freitag regarding production (.3); review due diligence reports regarding attempted service of Subpoenas to Echelon Music and Huy Nguyen (.1).	Pendleton, Michelle	0.90	352.35	53,037.90	WO	HD	TR	____
06/27/25	10126948	Analyze and advise on subpoena service issues, responses and next steps	Fates, Edward (Ted)	0.30	241.65	53,279.55	WO	HD	TR	____
06/29/25	10126095	Review and process production from Ameris Bank and supplemental production from Comerica Bank (.3); review and respond to correspondence from Bhindi Jewelers regarding additional information to locate records (.2); review communications from Payan	Pendleton, Michelle	1.00	391.50	53,671.05	WO	HD	TR	____

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		Surveying, L'Amor Jewelry, Azac Construction, Precise Escrow, and Wells Fargo Bank, as well as known transaction information, in preparation for meet and confer (.3); review and analyze due diligence statements regarding further attempts to effect code-compliant service of Subpoenas to Huy Nguyen, Echeon Music, TBG, LLC, and P&I Forever (.2)								
06/30/25	10128357	Call with Receiver and L. Ryan to discuss status of pending subpoenas, service attempts and responses	Fates, Edward (Ted)	0.30	241.65	53,912.70	WO	HD	TR	____
06/30/25	10128746	Communications J. He (Precise Escrow), Maria (Payan Surveying), Azac Construction, L'Amour Jewelery, and K. Bhindi (Bhindi Jewelers) regarding responding to Subpoena (.3); meeting with L. Ryan, K. Freitag regarding status of third-party discovery and strategy moving forward (.3); research online regarding TBG LLC, Vellichor Law, P&I Forever, Echelon Music/Eric Stenger, and Huy Nguyen (.6).	Pendleton, Michelle	1.20	469.80	54,382.50	WO	HD	TR	____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000820	Kaup, John	0.40	391.50	156.60
001665	Fates, Edward (Ted)	52.40	805.50	42,208.20
002510	Pham, Matt D.	0.30	648.00	194.40
002603	Pendleton, Michelle	30.20	391.50	11,823.30
		83.30		$54,382.50

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
Subtotal Fees				$54,382.50
Discount				0.00
Total Fees				54,382.50
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 09/16/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	52,740.90	52,740.90	0.00	142,638.30	142,638.30	0.00	163,741.05	163,741.05	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	1.92	1.92	0.00
Billed	0.00	0.00	0.00	21,100.83	21,100.83	0.00	21,100.83	21,100.83	0.00
Collected	0.00	0.00	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	***142,640.84***	***142,638.30***	***2.54***
Balance			
AR Balance	***0.00***	***0.00***	***0.00***
Unalloc	***0.00***		
Payment			
Client Trust	***0.00***		
Balance			

Billing Address

Krista Freitag, as Receiver for Superior Servicing LLC

09/16/25 14:03:26 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

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

09/16/25 14:03:26 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: 1361511
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			
05/07/25	10058848	Work on Receiver's second interim report	Fates, Edward (Ted)	1.20	966.60	966.60	WO	HD	TR	____
05/08/25	10060169	Discuss revisions and updates to second interim report with Receiver (.4) work on revisions to same (.2)	Fates, Edward (Ted)	0.60	483.30	1,449.90	WO	HD	TR	____
05/09/25	10060742	Analyze final updates and revisions to second interim report and discuss same with Receiver	Fates, Edward (Ted)	0.30	241.65	1,691.55	WO	HD	TR	____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.10	805.50	1,691.55
		2.10		$1,691.55
Subtotal Fees				$1,691.55
Discount				0.00
Total Fees				1,691.55
Total Disbursements				0.00

Attorney Billing Instructions

09/16/25 14:03:26 PROFORMA STATEMENT FOR MATTER 395887.00004 (Krista Freitag, as Receiver for Superior) (Reporting)

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

Billing Instructions

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

Account Summary – As Of 09/16/25

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	2,106.00	2,106.00	0.00	3,958.65	3,958.65	0.00	9,758.25	9,758.25	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	5,799.60	5,799.60	0.00	5,799.60	5,799.60	0.00
Collected	0.00	0.00	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	***3,958.65***	***3,958.65***	***0.00***
Balance			
AR Balance	***0.00***	***0.00***	***0.00***
Unalloc	***0.00***		
Payment			
Client Trust	***0.00***		
Balance			

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