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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

**FOURTH 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

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

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

12 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 Accredited, LLC, Sunrise Solutions USA, LLC, Alumni Advantage, LLC, Student Processing Center Group, LLC, SPCTWO, LLC, Gold West Financial, LLC, DM Financial, LLC, LJC Music National LLC, South Coast Services, LLC, Business Done Right Inc., ET&C Holdings, LLC, Capital Servicing, LLC, Cornerstone Doc Prep, Inc., Amerifed Doc Prep, LLC, Amerifed Servicing, Inc., Scholastic Solutions LLC, and First Clover Capital, Inc. (collectively the “Receivership Entities” or individually, a “Receivership Entity”), hereby submits this Fourth Interim Application for Payment of Fees and Reimbursement of Expenses (“Application”). This Application covers the period from July 1, 2025 through September 30, 2025 (the “Application Period”), and seeks approval of \$80,095.50 in fees and \$3,129.40 in expenses, and an order authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred (\$64,076.40) and 100% of the expenses incurred (\$3,129.40).

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 \$80,095.50 in fees for a total of 104.60 hours worked, and payment on an interim basis of 80% of that amount, or \$64,076.40. Allen Matkins has discounted 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	13.60	\$11,934.00
Asset Investigation & Recovery	84.60	\$62,545.50
Reporting	2.40	\$2,106.00
Operations & Asset Sales	1.10	\$965.25
Claims & Distributions	1.00	\$877.50
Employment/Fees	1.90	\$1,667.25
Total Fees	104.60	\$80,095.50

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. 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. At the FTC's request, the Receiver and Allen Matkins reviewed and provided guidance and input on the proposed stipulated final orders between the FTC and David Hernandez, Eric Caldwell and Dennise Merdjanian. The final orders provide for certain assets being turned over to the Receiver and subsequently sold, including an automobile, a boat, and real property. Allen Matkins also assisted the Receiver in analyzing legal and tax issues associated with the termination of the defined benefit plan of Receivership Entity Business Done Right, Inc. The reasonable and necessary fees for Allen Matkins' work in this category total \$11,934.00.

2. Asset Investigation & Recovery

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

- Issuing numerous 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;

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

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

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

1 subpoena and document management work was performed by an experienced paralegal
2 (Michelle Pendleton) at a discounted hourly rate of \$409.50.

3 The firm's work directly contributed to the Receiver's (a) recovery of an additional
4 \$108,000 in legal retainers, (b) settlement with Holland & Knight, which was approved by
5 the Court and produced an additional \$140,000 recovery for the receivership estate, and
6 (c) recovery of \$205,546 from the termination of the Business Done Right defined benefits
7 plan (which amount was received in the fourth quarter of 2025 and is subject to a portion
8 being held back for the payment of potential taxes). Allen Matkins also assisted the
9 Receiver in investigating and developing a significant fraudulent transfer claim relating to
10 the undeveloped land located on Bent Tree Road in Santa Ana, which she intends to pursue
11 in the near term if a settlement of such claim is not reached.

12 Allen Matkins also advised the Receiver on the appropriate scope and approach to
13 her forensic accounting analysis pursuant to the Appointment Orders. The reasonable and
14 necessary fees for Allen Matkins' work in this category total \$62,545.50.

15 **3. Reporting**

16 Allen Matkins' limited time in this category during the Application Period was
17 focused on assisting the Receiver with her Third Interim Report, which was filed on
18 September 10, 2025. Dkt. 78. The reasonable and necessary fees for Allen Matkins' work
19 in this category total \$2,106.00.

20 **4. Operations & Asset Sales**

21 Work in this category focused on the anticipated marketing and sale of the boat
22 turned over by Eric Caldwell pursuant to the stipulated final order entered between
23 Mr. Caldwell and the FTC. The reasonable and necessary fees for Allen Matkins' work in
24 this category total \$965.25.

25 **5. Claims & Distributions**

26 Work in this category focused on communications with counsel for Dennise
27 Merdjanian related to potential creditor claims and assisting the Receiver in providing
28

updates to consumer claimants. The reasonable and necessary fees for Allen Matkins' work in this category total \$877.50.

6. Employment/Fees

Allen Matkins does not charge for any work involved in preparing its own detailed fee applications. The firm assisted the Receiver and local counsel in preparing their fee applications and in meeting and conferring with counsel for the FTC regarding the fee applications. The reasonable and necessary fees for Allen Matkins' work in this category total \$1,667.25.

B. Summary of Expenses Requested for Reimbursement

Allen Matkins requests that the Court approve reimbursement of \$3,129.40 in out-of-pocket costs. The itemization of such expenses is summarized below by billing category.

Category	Total
Service of Process (numerous subpoenas)	\$3,079.50
PACER/Research Fees	\$1.90
Subpoenaed Documents	\$48.00
Total Costs	\$3,129.40

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)).

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

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

22 As previously noted, the Receiver promptly determined that utilizing a few third-
23 party vendors and her experienced staff at E3 as well as experienced, qualified counsel was
24 critical due to the lack of records, size and complexity of the receivership estate. Allen
25 Matkins has submitted a detailed fee application which describes the nature of the services
26 rendered. *See* **Exhibit A**. Allen Matkins has endeavored to staff matters as efficiently as
27 possible while remaining cognizant of the complexity of issues presented. As noted above,
28 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 \$80,095.50;
2. Authorizing and directing the Receiver to pay 80% of approved fees, or \$64,076.40, from the assets of the Receivership Entities;
3. Approving Allen Matkins' costs in the amount of \$3,129.40, 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: August 7, 2026

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/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 August 7, 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):

FOURTH 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; crodriguezvissek@crdslaw.com; kkeyes@crdslaw.com
- **Jarrod L. Rickard**
jlr@semenzarickard.com; oak@semenzarickard.com; alb@semenzarickard.com
- **Reid Abram Tepfer**
rtepfers@ftc.gov

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

Executed on August 7, 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	13-52

EXHIBIT A
Allen Matkins Leck Gamble
Mallory & Natsis LLP
Billing Entries

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00002 (Krista Freitag, as Receiver for Superior) (General Receivership)

Preliminary Billing FormBilling Atty: 001665 - Fates, Edward
(Ted)

Matter #: 395887.00002

Client Name: Krista Freitag, as Receiver for Superior

Date of Last Billing: 12/23/25

Matter Name: General Receivership

Proforma Number: 1381900

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			
07/01/25	10170981	Communications with Receiver regarding issues relating to FTC potential settlements with Caldwell and Hernandez	Fates, Edward (Ted)	0.50	438.75	438.75	WO	HD	TR	_____
07/03/25	10171066	Call with Receiver and FTC counsel regarding issues relating to Caldwell, Hernandez and Merdjaninan assets and potential settlements with FTC (.6) review draft proposed order relating to FTC potential settlement with Merdjanian (.4)	Fates, Edward (Ted)	1.00	877.50	1,316.25	WO	HD	TR	_____
07/11/25	10143306	Discuss issues relating to potential FTC settlement with D. Hernandez and assets involved in settlement with Receiver	Fates, Edward (Ted)	0.40	351.00	1,667.25	WO	HD	TR	_____
07/14/25	10159203	Analyze FTC request for loss calculation and discuss same with Receiver	Fates, Edward (Ted)	0.30	263.25	1,930.50	WO	HD	TR	_____
07/15/25	10147889	Call with Receiver re: issues relating to potential FTC settlement with D. Merdjanian and potential turnover of assets to receivership	Fates, Edward (Ted)	0.30	263.25	2,193.75	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00002 (Krista Freitag, as Receiver for Superior) (General Receivership)

Fees for Matter 395887.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/16/25	10149186	Call with Receiver regarding FTC stipulation and turnover of cars by Merdjanian and issues relating to appraisal of D. Hernandez rental property (.3) communications with counsel for FTC regarding stipulation (.8) proposed revisions to stipulation (.4)	Fates, Edward (Ted)	1.50	1,316.25	3,510.00	WO	HD	TR	_____
07/21/25	10154166	Call with Receiver, FTC counsel, and ERISA advisor re: termination of BDR defined benefit plan (.5) discuss same with Receiver (.4) follow up communications with FTC counsel (.3)	Fates, Edward (Ted)	1.20	1,053.00	4,563.00	WO	HD	TR	_____
07/22/25	10156699	Communications with Receiver and FTC counsel regarding D. Hernandez rental property and appraisal of same	Fates, Edward (Ted)	0.20	175.50	4,738.50	WO	HD	TR	_____
07/23/25	10158260	Discuss issues relating to prospective FTC settlements with Hernandez and Merdjanian with Receiver	Fates, Edward (Ted)	0.20	175.50	4,914.00	WO	HD	TR	_____
07/24/25	10160195	Communications with Receiver and FTC counsel re: issues relating D. Hernandez and Bryce Ave. property	Fates, Edward (Ted)	0.20	175.50	5,089.50	WO	HD	TR	_____
07/29/25	10165356	Discuss issues relating to Bryce property, rents therefrom and potential FTC settlement with Hernandez with Receiver (.2) analyze communication from FTC counsel relating to boat owned by Caldwell and discuss same with Receiver (.2)	Fates, Edward (Ted)	0.40	351.00	5,440.50	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00002 (Krista Freitag, as Receiver for Superior) (General Receivership)

Fees for Matter 395887.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action		
07/31/25	10168142	Communications with FTC and Receiver regarding issues relating to Caldwell boat and Hernandez property located at Bryce Ave.	Fates, Edward (Ted)	0.30	263.25	5,703.75	WO	HD	TR
08/01/25	10173760	Discuss issues relating to FTC settlement with Caldwell and potential sale of boat with Receiver	Fates, Edward (Ted)	0.30	263.25	5,967.00	WO	HD	TR
08/06/25	10177699	Call with Receiver and FTC counsel to discuss FTC potential settlements with Caldwell, Hernandez and Merdjanian, related assets, and issues relating thereto	Fates, Edward (Ted)	0.80	702.00	6,669.00	WO	HD	TR
08/07/25	10179161	Analyze draft stipulated order regarding FTC settlement with Hernandez (.6) work on revisions to same (.7) communications with counsel for FTC re: same (.3)	Fates, Edward (Ted)	1.60	1,404.00	8,073.00	WO	HD	TR
08/12/25	10185641	Communications with FTC counsel regarding draft stipulated order relating to potential resolution of claims against David Hernandez	Fates, Edward (Ted)	0.20	175.50	8,248.50	WO	HD	TR
08/15/25	10188299	Communications with Receiver, FTC counsel, and D. Hernandez regarding issues relating to stipulated order with D. Hernandez, escrow for funds, wire instructions, and related issues	Fates, Edward (Ted)	0.40	351.00	8,599.50	WO	HD	TR
08/19/25	10193246	Advise Receiver on meet and confer issues with FTC regarding receivership reporting and fee applications	Fates, Edward (Ted)	0.40	351.00	8,950.50	WO	HD	TR

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00002 (Krista Freitag, as Receiver for Superior) (General Receivership)

Fees for Matter 395887.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
08/21/25	10196246	Communications with FTC counsel to address question regarding report and interim fee applications	Fates, Edward (Ted)	0.20	175.50	9,126.00	WO	HD	TR	_____
08/25/25	10200517	Analyze FTC stipulation with Caldwell and Hernandez to extend response deadlines	Fates, Edward (Ted)	0.10	87.75	9,213.75	WO	HD	TR	_____
09/05/25	10216549	Advise Receiver on information from former employee about potential continuation of similar student debt relief enterprise	Fates, Edward (Ted)	0.20	175.50	9,389.25	WO	HD	TR	_____
09/08/25	10218993	Analyze FTC joint motion for approval of permanent injunction / money judgment and related orders regarding Caldwell and Hernandez (.4) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.60	526.50	9,915.75	WO	HD	TR	_____
09/10/25	10222554	Analyze judgment orders entered by court as to Caldwell and Hernandez (.4) advise Receiver re: same (.2)	Fates, Edward (Ted)	0.60	526.50	10,442.25	WO	HD	TR	_____
09/11/25	10223840	Discuss tax issues for receivership estate with Receiver and advise on same	Fates, Edward (Ted)	0.40	351.00	10,793.25	WO	HD	TR	_____
09/15/25	10228485	Discuss receivership entity tax return issues and tax payments due with Receiver and L. Ryan and advise on same and communications with FTC counsel	Fates, Edward (Ted)	1.30	1,140.75	11,934.00	WO	HD	TR	_____

Disbursements for Matter 395887.00002 (General Receivership)

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00002 (Krista Freitag, as Receiver for Superior) (General Receivership)

Trans Date	Index	Type	Quantity	Amt	WO	HD	TR	
07/07/25	2958222	DCSRCH – Document Search - PACER - Usage 2nd QTR	0.00	1.90	WO	HD	TR	_____
07/22/25	2944732	ADV – Edward D. Jones & Co., L.P. - Research/Production Fee	0.00	48.00	WO	HD	TR	_____
08/01/25	2950460	POS – Nationwide Legal, LLC - U.S. BANK NATIONAL ASSOCIATION DBA US BANK, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	116.20	WO	HD	TR	_____
08/01/25	2950461	POS – Nationwide Legal, LLC - Echelon Music Group L.L.C c/o Agent-Eric Stenger, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	211.50	WO	HD	TR	_____
08/04/25	2950463	POS – Nationwide Legal, LLC - Echelon Music Group L.L.C. - Eric Stenger, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	481.80	WO	HD	TR	_____
08/11/25	2948770	BW – Duplication - Black & White Copies	1.00	0.10	WO	HD	TR	_____
08/12/25	2958742	POS – Service of Process - Nationwide Legal LLC - Echelon Music Group L.L.C. - Eric Stenger, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	433.30	WO	HD	TR	_____
08/13/25	2950462	POS – Nationwide Legal, LLC - Echelon Music Group L.L.C. c/o Eric Stenger, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	211.50	WO	HD	TR	_____
09/03/25	2957646	POS – Nationwide Legal, LLC - JPMorgan Chase Bank, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES	0.00	222.60	WO	HD	TR	_____
09/03/25	2957649	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	223.20	WO	HD	TR	_____
09/09/25	2957648	POS – Nationwide Legal, LLC - Huy Nguyen, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES	0.00	223.20	WO	HD	TR	_____
09/09/25	2964128	POS – Service of Process - Nationwide Legal LLC - Huy Nguyen, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION	0.00	223.20	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00002 (Krista Freitag, as Receiver for Superior) (General Receivership)

09/09/25	2964129	OF PREMISES IN A CIVIL ACTION 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 PLC - c/o Northwest Registered Agent, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	509.70	WO	HD	TR	_____
09/12/25	2957647	POS – Nationwide Legal, LLC - Start New Settlement, LLC, SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION	0.00	223.20	WO	HD	TR	_____

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	13.60	877.50	11,934.00
		13.60		\$11,934.00
Subtotal Fees				\$11,934.00
Discount				0.00
Total Fees				11,934.00
Total Disbursements				3,129.40

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 01/15/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	13,302.75	13,250.25	52.50	0.00	0.00	0.00	70,530.33	63,723.60	6,806.73
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	7,420.84	4,640.40	2,780.44	0.00	0.00	0.00	44,432.10	44,432.10	3,677.33
Collected	7,420.84	4,640.40	2,780.44	0.00	0.00	0.00	48,109.43	44,432.10	3,677.33
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00002 (Krista Freitag, as Receiver for Superior) (General Receivership)

	Total	Fees	Costs
WIP	32,916.66	19,291.50	13,625.16
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@ethreadvisors.com
 E3 Advisors
 355 South Grand Avenue, Suite 2450
 Los Angeles, CA 90071

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Preliminary Billing FormBilling Atty: 001665 - Fates, Edward
(Ted)

Matter #: 395887.00003

Client Name: Krista Freitag, as Receiver for Superior

Date of Last Billing: 12/23/25

Matter Name: Asset Investigation & Recovery

Proforma Number: 1381900

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	
07/02/25	10134183	Communications with Receiver regarding Caldwell vehicles and potential recovery of same (.2) discuss questions re: scope from subpoena recipient with Receiver and L. Ryan (.3)	Fates, Edward (Ted)	0.50	438.75	438.75	WO	HD	TR
07/02/25	10134658	Review and process Subpoena productions from L'Amor Jewelry and Bhindi Jewelers (.2); draft correspondence to L. Ryan and K. Freitag (.1); draft brief summary of records provided (.1).	Pendleton, Michelle	0.40	163.80	602.55	WO	HD	TR
07/03/25	10159066	Call with Receiver re: asset investigative issues, subpoenas and next steps	Fates, Edward (Ted)	0.40	351.00	953.55	WO	HD	TR
07/07/25	10137721	Call/email from recipient of subpoena regarding request for extension of document production deadline (.3) analyze correspondence from Edward Jones regarding subpoena and advise on next steps (.2)	Fates, Edward (Ted)	0.50	438.75	1,392.30	WO	HD	TR

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/08/25	10139856	Communications with A. Fisette regarding further information requested to locate records responsive to Subpoena to WFG National Title (.2); review correspondence from E. Sallee and communications with Sallee & Associates regarding transaction information to locate records responsive to Subpoena (.3); review correspondence from M. Nikolova regarding responding to Subpoena to Edward Jones (.1); review correspondence from X. Jin regarding responding to Subpoena to Better Life Plans (.1); communications with D. Stryker regarding responding to Subpoena to Glenn Rick Engineering (.1); update summary of meet and confer efforts accordingly (.1).	Pendleton, Michelle	0.90	368.55	1,760.85	WO	HD	TR	_____
07/08/25	10139946	Analyze objections to subpoena from Crossroads Financial (.2) emails with counsel for Crossroads Financial (.2) discuss issues relating to property taxes for Dent Tree property and response to seller of land re: same with Receiver (.3)	Fates, Edward (Ted)	0.70	614.25	2,375.10	WO	HD	TR	_____
07/09/25	10140344	Discuss issues relating to Hartford insurance claim with Receiver and L. Ryan (.5) communications with Hartford Insurance re: employee dishonesty claim (.6) call with counsel for subpoena recipient (Crossroads) regarding document requests and production (.4)	Fates, Edward (Ted)	1.50	1,316.25	3,691.35	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/10/25	10142882	Research and forward information regarding properties owned by Huy Nguyen.	Kaup, John	0.20	81.90	3,773.25	WO	HD	TR	_____
07/10/25	10143158	Analyze and advise on subpoena service issues and next steps (.2) communications with Receiver and Hartford Insurance re: claim (.4)	Fates, Edward (Ted)	0.60	526.50	4,299.75	WO	HD	TR	_____
07/11/25	10143305	Communications with Receiver re: requests for additional information from Hartford Insurance (.4) respond to Hartford Insurance re: same (.3)	Fates, Edward (Ted)	0.70	614.25	4,914.00	WO	HD	TR	_____
07/14/25	10145264	Discuss defined benefit plan issue for Business Done Right with Receiver (.5) call from E. Youssef regarding subpoena and document production (.3) advise Receiver re: same (.1) advise on next steps for Nguyen subpoena (.3)	Fates, Edward (Ted)	1.20	1,053.00	5,967.00	WO	HD	TR	_____
07/14/25	10146898	Review responses and requests for information relating to Subpoenas to H. Nguyen and Crossroads Financial Technologies (.2); draft revised Subpoena to H. Nguyen (.2); communications with T. Fates and P. Lewis (.1).	Pendleton, Michelle	0.50	204.75	6,171.75	WO	HD	TR	_____
07/16/25	10149182	Call with Receiver regarding Business Done Right defined benefit plan issues (.2) analyze documents from FTC counsel re: same (.3) respond to communications from Hartford regarding insurance claims (.3) communications with Y. Elhamy regarding subpoena and	Fates, Edward (Ted)	1.40	1,228.50	7,400.25	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		production of documents (.4) advise on follow up and next steps for outstanding subpoenas (.2)								
07/16/25	10149677	Review Note and correspondence from E. Youssef in response to Subpoena (.1); review transaction evidence for Subpoenaed records relating to H. Nguyen (.1); communications with T. Fates and P. Lewis regarding status and strategy for third-party records (.3).	Pendleton, Michelle	0.50	204.75	7,605.00	WO	HD	TR	_____
07/17/25	10150699	Advise on document production issues for subpoena to BMO Bank	Fates, Edward (Ted)	0.10	87.75	7,692.75	WO	HD	TR	_____
07/18/25	10151931	Review and respond to email from BMO Bank regarding request for information to respond to Subpoena (.2); draft summary of responses to Subpoenas to date (.1); communications with T. Fates and L. Ryan regarding status update (.1).	Pendleton, Michelle	0.40	163.80	7,856.55	WO	HD	TR	_____
07/18/25	10152196	Advise on issues relating to WFG Title and BMO Bank subpoena and document production issues (.4) communications with Hartford Insurance re: pending claim (.2)	Fates, Edward (Ted)	0.60	526.50	8,383.05	WO	HD	TR	_____
07/21/25	10153835	Advise on approach and next steps for outstanding subpoenas and document productions	Fates, Edward (Ted)	0.40	351.00	8,734.05	WO	HD	TR	_____
07/21/25	10154928	Review and analyze Subpoenas and responses to date (.3); draft email to O. Moss regarding incomplete Subpoena	Pendleton, Michelle	1.70	696.15	9,430.20	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		response from NorthAB (.2); draft email to M. Rapkowski regarding incomplete Subpoena response from Payment Automation Network (.2); draft email to E. Marshall regarding Subpoena response from Crossroads Financial Technologies (.1); communications with Azac Construction regarding response to Subpoena (.1); draft status update to K. Freitag and L. Ryan (.3); communications with T. Fates and P. Lewis (.2); revise summary of responses and meet and confer (.3).								
07/22/25	10156774	Analyze and advise on next steps relating to subpoenas to WFG National Title and Edward Jones and document productions (.4) follow up communications with Youssef regarding subpoena and document production (.2) analyze responses and documents produced by D. Hernandez (.5) discuss same with Receiver (.2)	Fates, Edward (Ted)	1.30	1,140.75	10,570.95	WO	HD	TR	_____
07/23/25	10157970	Analyze text messages produced by Youssef (1.1) advise Receiver re: same and next steps (.5) communications with Youssef re: production of emails and attachments (.3) communications with Receiver and L. Ryan re: next steps for outstanding subpoenas (.2)	Fates, Edward (Ted)	2.10	1,842.75	12,413.70	WO	HD	TR	_____
07/23/25	10158325	Review and analyze documents from Ally Bank, Ameris Bank, and WFG Title (1.6); draft brief summaries of the same (1.3); communications with T. Fates and	Pendleton, Michelle	3.10	1,269.45	13,683.15	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		L. Ryan (.2).								
07/23/25	10159538	Communications with Better Life Plans re: subpoena for production of documents	Fates, Edward (Ted)	0.20	175.50	13,858.65	WO	HD	TR	_____
07/25/25	10170971	Communications with counsel for Better Life Plans regarding document production in response to subpoena (.2) communications with Youssef re: email production (.2)	Fates, Edward (Ted)	0.40	351.00	14,209.65	WO	HD	TR	_____
07/28/25	10162280	Review and process texts and emails produced by E. Youssef, as well as production from Better Life Plans (.3); revise Subpoena summary (.1); review and respond to correspondence from A. Fissette (WFT Title) regarding no additional records (.1).	Pendleton, Michelle	0.50	204.75	14,414.40	WO	HD	TR	_____
07/28/25	10170885	Analyze emails and attachments produced by Youssef (.7) discuss same with Receiver (.3) follow up communications with Youssef (.4) advise on next steps for certain outstanding subpoenas issued to banks (.3) analyze communication from Hartford Insurance (.2) discuss same with Receiver (.2)	Fates, Edward (Ted)	2.10	1,842.75	16,257.15	WO	HD	TR	_____
07/29/25	10165352	Communications with Receiver and Youssef regarding video call (.2) discuss issues relating to BDR defined benefit plan with Receiver (.1) advise on next steps re: Amex subpoena (.2)	Fates, Edward (Ted)	0.50	438.75	16,695.90	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
07/29/25	10165532	Review and analyze communications and summary regarding further follow up needed to obtain Subpoenaed records (.6); draft correspondence to O. Moss regarding additional records from NorthAB (.2); draft correspondence to BMO Bank regarding lack of response to Subpoena (.2); communications with Lake Michigan Credit Union regarding representation as to lack of responsive records (.1); communications with Crossroads Financial Technologies, Payan Surveying, TGR Geotechnical, Precise Escrow, and Azac Construction regarding lack of response to Subpoena (.3); draft summary of Subpoenaed records and status of outstanding requests to L. Ryan and K. Freitag (.4); communications with T. Fates (.1); draft Subpoenas to American Express National Bank and American Express Travel Related Services, including requests for production (.3); draft updated Subpoena to Echelon Music Group based on efforts to effect service to date (.1); draft revised Subpoena to Wells Fargo Bank, including requests for production related only to D. Hernandez (per the witness' requests) (.2).	Pendleton, Michelle	2.40	982.80	17,678.70	WO	HD	TR	_____
07/30/25	10166860	Advise on issues relating to subpoena to Chase and document productions	Fates, Edward (Ted)	0.20	175.50	17,854.20	WO	HD	TR	_____
07/30/25	10171882	Review and analyze Subpoena and responses from JPMorgan Chase thus far in response to L. Ryan's request (.1);	Pendleton, Michelle	0.30	122.85	17,977.05	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		communications with T. Fates (.1); communications with O. Moss of NorthAB regarding further investigation as to responsive records (.1).								
08/01/25	10172761	Draft Subpoena to U.S. Bank regarding records relating to Huy Nguyen and TBG LLC, including requests for production of documents (.3); draft correspondence to E. Sallee for Azac Construction regarding demand for supplemental response to Subpoena (.2); draft and respond to correspondence to D. McDowell regarding demand for production of documents (and contemporaneous review of prior communications) (.3); draft correspondence to E. Marshall regarding outstanding Subpoena response from Crossroads Financial (and contemporaneous review of prior communications) (.1); review response and create follow up (.1); draft correspondence to A. Brown (Lake Michigan Credit Union) regarding further investigation and supplemental Subpoena response (and contemporaneous review of prior communications) (.2); draft correspondence to D. Stryker regarding outstanding Subpoena response from Glenn A. Rick Engineering (and contemporaneous review of prior communications) (.3).	Pendleton, Michelle	1.50	614.25	18,591.30	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
08/01/25	10184393	Review and advise on additional subpoenas to financial institutions and other third parties, follow up communications and next steps (.7) review documents produced by Youssef in preparation for Zoom meeting with Youssef and Receiver (.6) discuss status and issues relating to Santa Ana property and TBG with Receiver (.3) attend Zoom meeting with Receiver and Youssef (1.3) discuss same and next steps with Receiver (.3)	Fates, Edward (Ted)	3.20	2,808.00	21,399.30	WO	HD	TR	_____
08/04/25	10175691	Revise Subpoena production summary regarding additional information relating to Eric Stenger (agent for Echelon Music Group) and possible incarceration.	Pendleton, Michelle	0.10	40.95	21,440.25	WO	HD	TR	_____
08/04/25	10203282	Work on list of follow-up document requests for Youssef (1.3) discuss same with Receiver (.5) advise on strategy and next steps re: Echelon Music subpoena and service (.3)	Fates, Edward (Ted)	2.10	1,842.75	23,283.00	WO	HD	TR	_____
08/05/25	10176400	Discuss follow-up list for Youssef with Receiver (.3) finalize and send same (.2) analyze issues relating to potential termination of BDR defined benefit plan (.4)	Fates, Edward (Ted)	0.90	789.75	24,072.75	WO	HD	TR	_____
08/05/25	10176661	Communications with E. Sallee's office regarding transactions and project records for Azac Construction.	Pendleton, Michelle	0.10	40.95	24,113.70	WO	HD	TR	_____
08/06/25	10177785	Review email from P. Hardin regarding Subpoena to Azac Construction (.1);	Pendleton, Michelle	0.50	204.75	24,318.45	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		communications with T. Fates regarding meet and confer with Azac's authorized agent regarding the same (.2); communications with L. Ryan and K. Freitag with secured link regarding further productions in response to Subpoenas (.2)								
08/06/25	10184420	Call with Receiver to discuss outstanding subpoenas, asset investigation tasks, and BDR defined benefit plan (.4) advise on next steps relating to Azac Construction subpoena and PAN document production (.3)	Fates, Edward (Ted)	0.70	614.25	24,932.70	WO	HD	TR	_____
08/08/25	10203288	Advise on outstanding subpoenas, responses to same, document productions and meet and confer communications	Fates, Edward (Ted)	0.50	438.75	25,371.45	WO	HD	TR	_____
08/11/25	10182374	Review prior communications with E. Sallee, Subpoena, and Cashier's Check (.2); research regarding appropriate codes and requirements (for motion to compel, subpoena responses, and authorized agent for corporation) (.2); draft email and meet and confer correspondence to Azac Construction (.8)	Pendleton, Michelle	1.20	491.40	25,862.85	WO	HD	TR	_____
08/11/25	10190138	Work on meet and confer letter to Azac Construction re: failure to comply with subpoena to produce documents (.5) communications with registered agent for Azac Construction (.3)	Fates, Edward (Ted)	0.80	702.00	26,564.85	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
08/12/25	10184379	Analyze documents provided by registered agent for Azac Construction relating to Lake Havasu property (.6) discuss same with Receiver (.2) review status of outstanding subpoenas and advise on follow up and next steps (.4) communications with counsel for Payliance (.2) communications with Azac Construction (.3) follow up communications to Youssef regarding document production (.2) review additional documents produced by Youssef regarding use of funds loaned by BDR (.8) call with Receiver re: issues relating to Azac Construction / Joanou, Youssef, and Dempsey (.4)	Fates, Edward (Ted)	3.10	2,720.25	29,285.10	WO	HD	TR	_____
08/12/25	10184901	Review and analyze escrow documents from E. Sallee (per Azac Construction Subpoena) (.1); communications with T. Fates regarding same and status of outstanding Subpoenas (.2); review and analyze property records relating to sale and transfer of Lake Havasu property (.3).	Pendleton, Michelle	0.60	245.70	29,530.80	WO	HD	TR	_____
08/13/25	10186047	Call with registered agent for Azac Construction regarding production of requested documents (.3) communications with counsel for Payliance (.1) communications with T. Joanou / Azac Construction (.2) review documents provided and advice Receiver re: same (.3)	Fates, Edward (Ted)	0.90	789.75	30,320.55	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
08/13/25	10186215	Review and respond to correspondence from L. Ryan regarding supplemental production request to Edward Jones.	Pendleton, Michelle	0.10	40.95	30,361.50	WO	HD	TR	_____
08/13/25	10212874	Research and forward information regarding ownership of Santa Ana and Spring, TX properties.	Kaup, John	0.20	81.90	30,443.40	WO	HD	TR	_____
08/14/25	10187020	Communications with payment processor regarding reserve balance and ACH return transactions (.7) advise Receiver re: same (.3) advise on follow up communications for outstanding subpoenas (.2) work on meet and confer letters for subpoena recipients who have failed to produce documents (.7)	Fates, Edward (Ted)	1.90	1,667.25	32,110.65	WO	HD	TR	_____
08/14/25	10187105	Review and respond to correspondence from O. Moss regarding NorthAB transaction reports (.1); review and process additional records responsive to Subpoena from Azac Construction and T. Joanou, as well as Payliance (.3); analyze recent communications with Subpoena recipients regarding further meet and confer efforts, including formal written demand and motion to compel discussions (.3); communications with T. Fates (.1); draft 8 meet and confer letters regarding failure to respond to Subpoenas (to BMO Bank (BMO Bank National Association), Crossroads Financial Technologies, Precise Escrow, Glenn A. Rick Engineering and Development Co., Payan Surveying, Inc., TGR Geotechnical, Inc., Metro	Pendleton, Michelle	1.70	696.15	32,806.80	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered Point, Inc., and CFTPay) (.9)	Timekeeper	Hours	Fees	Sum	Circle Action			
08/15/25	10188550	Advise on next steps regarding subpoenas, follow up communications and document productions (.3) follow up communications with Youssef regarding document production (.3) discuss same with Receiver (.1)	Fates, Edward (Ted)	0.70	614.25	33,421.05	WO	HD	TR	_____
08/15/25	10188859	Create protected share file for additional Subpoena records (.1); communications with L. Ryan and K. Freitag (.1).	Pendleton, Michelle	0.20	81.90	33,502.95	WO	HD	TR	_____
08/18/25	10190655	Communications with L. Ryan and North AB regarding transfer of remaining reserve balance to receivership and production of documents (.5) follow up communications with Youssef regarding requested documents (.3)	Fates, Edward (Ted)	0.80	702.00	34,204.95	WO	HD	TR	_____
08/20/25	10194713	Communications with Receiver and North AB regarding transfer of reserve balance funds to receivership (.2) follow up communications with Youssef (.1) communications with Receiver and FTC counsel regarding issues relating to Youssef and Hernandez (.2) analyze emails and attachments produced by Youssef (.6)	Fates, Edward (Ted)	1.10	965.25	35,170.20	WO	HD	TR	_____
08/22/25	10197408	Advise on US Bank subpoena response and document production (.2) analyze information regarding transfers from receivership entities to Holland & Knight law firm (.4) discuss same with Receiver (.3)	Fates, Edward (Ted)	0.90	789.75	35,959.95	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
08/25/25	10200600	Draft email to password request for US Bank to access records produced in response to Subpoena (.1); review and process records received via hard copy and CDs (.2); draft summary of US Bank records (1.5); communications with T. Fates (.1).	Pendleton, Michelle	1.90	778.05	36,738.00	WO	HD	TR	_____
08/25/25	10202304	Communications to Holland & Knight re: transfers received from receivership entities (.7) communications with Receiver re: potential subpoena to A. Dempsey (.4)	Fates, Edward (Ted)	1.10	965.25	37,703.25	WO	HD	TR	_____
08/26/25	10202172	Communications with M. Nikolova (Edward Jones) regarding additional account identified in records and possible supplemental production (.2); communications with L. Ryan and K. Freitag regarding additional Subpoena to Edward Jones and production from U.S. Bank as to Huy Nguyen and TBG (.3); create protected link of bank records (.1).	Pendleton, Michelle	0.60	245.70	37,948.95	WO	HD	TR	_____
08/26/25	10210748	Email correspondence with client regarding Redstone demand letter	Pham, Matt D.	0.20	137.70	38,086.65	WO	HD	TR	_____
08/27/25	10203292	Follow up communications with Youssef regarding document production (.2) call / emails with Receiver re: accounting of transfers to and from Rahul Bagat and Huy Nguyen and analysis of same, subpoenas and service issues (.9) communications with FTC counsel re:	Fates, Edward (Ted)	1.60	1,404.00	39,490.65	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		same and D. Hernandez refusal to consent to release of tax-related info (.5)								
08/27/25	10203435	Review and respond to email from L. Ryan regarding Subpoena responses (.1); analyze communications and productions regarding responses and supplement from American Express and JPMorgan Chase (.2); draft correspondence to JPMorgan Chase requesting supplemental responses to Subpoena requests (.3); draft correspondence to American Express regarding failure to respond to Subpoenas for merchant and bank records (.2).	Pendleton, Michelle	0.80	327.60	39,818.25	WO	HD	TR	_____
08/28/25	10204646	Analyze documents produced by Youssef (.2) follow up communications with Youssef (.1) advise Receiver re: same (.1) follow up communications with Holland & Knight (.3)	Fates, Edward (Ted)	0.70	614.25	40,432.50	WO	HD	TR	_____
08/28/25	10205336	Review and respond to correspondence from American Express regarding responses to Subpoenas.	Pendleton, Michelle	0.20	81.90	40,514.40	WO	HD	TR	_____
09/02/25	10215122	Review and analyze due diligence reports and U.S. Bank records (.2); draft correspondence to K. Freitag and L. Ryan regarding further attempts to effect service to TBG LLC and Huy Nguyen (.2); draft updated Subpoena to Huy Nguyen based on additional information in bank records (.2); draft Subpoena to JPMorgan Chase, including requests for	Pendleton, Michelle	0.90	368.55	40,882.95	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		records relating to A. Dempsey (.3).								
09/02/25	10225874	Analyze response from Holland & Knight regarding funds received from receivership entities (.5) analyze facts and legal issues (.8) prepare response to Holland & Knight (.9) analyze and revise document subpoenas and advise on follow up and next steps (.6)	Fates, Edward (Ted)	2.80	2,457.00	43,339.95	WO	HD	TR	_____
09/04/25	10225912	Analyze settlement correspondence from Holland & Knight and associated legal issues (.9) prepare response to same (1.3)	Fates, Edward (Ted)	2.20	1,930.50	45,270.45	WO	HD	TR	_____
09/05/25	10225989	Discuss Holland & Knight settlement issues with Receiver (.3) prepare settlement communication to Holland & Knight (.5)	Fates, Edward (Ted)	0.80	702.00	45,972.45	WO	HD	TR	_____
09/08/25	10218515	Communications with Hartford Insurance re: employee dishonesty claim (.2) advise on next steps re: outstanding subpoenas and follow up meet and confer letters (.6)	Fates, Edward (Ted)	0.80	702.00	46,674.45	WO	HD	TR	_____
09/08/25	10219631	Review and analyze productions, Subpoenas, and communications with K. Freitag, L. Ryan, and subpoenaed parties (.4); draft status update to K. Freitag and L. Ryan (.4).	Pendleton, Michelle	0.80	327.60	47,002.05	WO	HD	TR	_____
09/09/25	10220718	Review and respond to due diligence update from process server regarding service attempts on Huy Nguyen (.1); communications with Ms. Moss	Pendleton, Michelle	1.50	614.25	47,616.30	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		regarding supplemental production from NorthAB (.2); communications with E. Marshall regarding meet and confer on response to Subpoena (for Crossroads) (.1); draft email to American Express regarding status of response(s) to Subpoenas (.1); communications with BMO Bank regarding meet and confer on response to Subpoena (.1); review and analyze communications regarding ACH.com Subpoena (.1); draft meet and confer correspondence to ACH regarding lack of response to date (.2); revise and finalize status update to K. Freitag and L. Ryan (.4); communications with T. Fates and P. Lewis (.2).								
09/09/25	10246315	Follow up communications to E. Youssef regarding failure to produce requested documents (.3) communications with counsel for CFT Pay regarding outstanding subpoena (.2) revise meet and confer letter to ACH.com (.2) discuss anticipated liquidation of Bryce property, boat, corvette and Schwab retirement plan with Receiver (.4) discuss potential subpoenas relating to transfers to A. Dempsey and Pickford escrow company with Receiver (.3) analyze accounting info relating to same (.3)	Fates, Edward (Ted)	1.70	1,491.75	49,108.05	WO	HD	TR	_____
09/10/25	10222402	Communications with Holland & Knight re: demand for turnover of funds and settlement offer	Fates, Edward (Ted)	0.20	175.50	49,283.55	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
09/11/25	10223207	Analyze email from T. Chou re: Bent Tree property (.2) discuss same with Receiver and G. Rodriguez (.9) call from Payan Surveying re: subpoena and document production (.4) communications with TGR Geotechnical regarding subpoena (.2) analyze document produced (.4)	Fates, Edward (Ted)	2.10	1,842.75	51,126.30	WO	HD	TR	_____
09/12/25	10224418	Review due diligence reports regarding service attempts to Start New Settlement and Huy Nguyen (.1); communications with P. Lewis regarding strategy for service (.2).	Pendleton, Michelle	0.30	122.85	51,249.15	WO	HD	TR	_____
09/12/25	10224554	Advise Receiver on communications with Caldwell and Hernandez regarding turnover of assets pursuant to judgments, communications with T. Chou regarding Bent Tree property, and termination of BDR defined benefits plan	Fates, Edward (Ted)	1.40	1,228.50	52,477.65	WO	HD	TR	_____
09/15/25	10226801	Review and process documents from Crossroads Technologies and Payan Surveying in response to Subpoenas (.3); review communications from D. Stryker regarding Glenn Rick Engineering (.1).	Pendleton, Michelle	0.40	163.80	52,641.45	WO	HD	TR	_____
09/15/25	10228522	Analyze responses from Caldwell and Hernandez to Receiver communications relating to turn over of assets pursuant to court-entered judgments (.4) communications with Payan Surveying re: response to subpoena (.4) brief	Fates, Edward (Ted)	1.70	1,491.75	54,133.20	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		review of documents produced (.3) advise on next steps (.1) brief review of document produced by CFT Pay (.3) follow up communications with Holland & Knight re: potential resolution (.2)								
09/16/25	10228474	Address communications from counsel for Glenn Rick Engineering regarding document subpoena (.1) advise on next steps (.1) analyze responses from Caldwell relating turnover of boat and car, documentation re: same (.4) discuss insurance for boat with Receiver (.3) communication with Payan Surveying re: document production (.2) brief review of documents produced (.1) call / emails with Shipkevich firm regarding funds in client trust account regarding Cornerstone, Gold West and Hernandez (.8) advise Receiver re: same (.6) analyze settlement communication from Holland & Knight (.4) discuss same with Receiver (.3) prepare response to same (.5)	Fates, Edward (Ted)	3.70	3,246.75	57,379.95	WO	HD	TR	_____
09/17/25	10229444	Communications with F. Shipkevich regarding turnover of retainer funds held for receivership entities (.2) communications with counsel for Metro Point re: subpoena for documents (.2) communications with Receiver and Caldwell re: turnover of Corvette (.1)	Fates, Edward (Ted)	0.50	438.75	57,818.70	WO	HD	TR	_____
09/18/25	10230977	Review and process correspondence from BMO Bank regarding status of response to Subpoena (.2);	Pendleton, Michelle	0.30	122.85	57,941.55	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action			
		communications with T. Fates (.1).								
09/18/25	10232083	Communications with F. Shipkevich regarding turnover of legal retainer funds held for entities in receivership (.3) call with Receiver and ERISA consultant regarding termination of BDR defined benefit plan (.4) call with counsel for Metro Point re: subpoena and document production (.4) discuss Pacific Life insurance policy issues with Receiver (.2) analyze revised settlement offer from Holland & Knight and discuss same with Receiver (.4)	Fates, Edward (Ted)	1.70	1,491.75	59,433.30	WO	HD	TR	_____
09/19/25	10232205	Prepare and send further settlement communication to Holland & Knight	Fates, Edward (Ted)	0.40	351.00	59,784.30	WO	HD	TR	_____
09/24/25	10239397	Analyze communications from Receiver and ERISA advisor regarding termination of Business Done Right defined benefits plan and related tax issues	Fates, Edward (Ted)	0.40	351.00	60,135.30	WO	HD	TR	_____
09/26/25	10243738	Review and analyze notice regarding service of Subpoena regarding Crossroads Financial.	Pendleton, Michelle	0.10	40.95	60,176.25	WO	HD	TR	_____
09/29/25	10249290	Call / emails with counsel for New Start Financial re: subpoena for documents (.4) analyze response to settlement offer from Holland & Knight and advise Receiver re: same (.8) discuss issues relating to Shipkevich funds, termination of BDR defined benefits plan, and recovery of Caldwell boat with Receiver (.7) prepare response to Holland &	Fates, Edward (Ted)	2.50	2,193.75	62,370.00	WO	HD	TR	_____

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Fees for Matter 395887.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered Knight (.6)	Timekeeper	Hours	Fees	Sum	Circle Action			
09/30/25	10246226	Communications with counsel for Metro Point re: document production in response to subpoena	Fates, Edward (Ted)	0.20	175.50	62,545.50	WO	HD	TR	_____

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000820	Kaup, John	0.40	409.50	163.80
001665	Fates, Edward (Ted)	59.50	877.50	52,211.25
002510	Pham, Matt D.	0.20	688.50	137.70
002603	Pendleton, Michelle	24.50	409.50	10,032.75
		84.60		\$62,545.50
Subtotal Fees				\$62,545.50
Discount				0.00
Total Fees				62,545.50
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 01/15/26

Fiscal YTD				Calendar YTD				LTD	
Worked	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
	105,174.45	105,174.45	0.00	1,989.00	1,989.00	0.00	207,466.65	207,466.65	0.00

01/15/26 12:38:35 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	2.11	2.11	0.00
Billed	26,807.14	26,807.14	0.00	0.00	0.00	0.00	47,907.97	47,907.97	0.00
Collected	26,807.14	26,807.14	0.00	0.00	0.00	0.00	47,907.97	47,907.97	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	160,321.95	159,556.95	765.00						
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

01/15/26 12:38:36 PROFORMA STATEMENT FOR MATTER 395887.00004 (Krista Freitag, as Receiver for Superior) (Reporting)

Preliminary Billing FormBilling Atty: 001665 - Fates, Edward
(Ted)

Matter #: 395887.00004

Client Name: Krista Freitag, as Receiver for Superior

Date of Last Billing: 12/23/25

Matter Name: Reporting

Proforma Number: 1381900

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	
08/22/25	10197060	Work on Receiver's third interim report (1.3) discuss same with Receiver (.4) meet and confer communications with FTC counsel (.1)	Fates, Edward (Ted)	1.80	1,579.50	1,579.50	WO	HD	TR
09/03/25	10212910	Discuss follow up with FTC counsel regarding report and related issues with Receiver	Fates, Edward (Ted)	0.20	175.50	1,755.00	WO	HD	TR
09/08/25	10219122	Communications with FTC counsel re: interim report and fee applications (.1) advise on next steps (.1) communications with Receiver re: final updates to report (.2)	Fates, Edward (Ted)	0.40	351.00	2,106.00	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	2.40	877.50	2,106.00
		2.40		\$2,106.00
Subtotal Fees				\$2,106.00
Discount				0.00
Total Fees				2,106.00

01/15/26 12:38:36 PROFORMA STATEMENT FOR MATTER 395887.00004 (Krista Freitag, as Receiver for Superior) (Reporting)

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
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 01/15/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,597.75	3,597.75	0.00	175.50	175.50	0.00	11,250.00	11,250.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	161.10	161.10	0.00	0.00	0.00	0.00	5,960.70	5,960.70	0.00
Collected	161.10	161.10	0.00	0.00	0.00	0.00	5,960.70	5,960.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	5,289.30	5,289.30	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@ethreadvisors.com E3 Advisors
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01/15/26 12:38:36 PROFORMA STATEMENT FOR MATTER 395887.00004 (Krista Freitag, as Receiver for Superior) (Reporting)

355 South Grand Avenue, Suite 2450
Los Angeles, CA 90071

01/15/26 12:38:36 PROFORMA STATEMENT FOR MATTER 395887.00005 (Krista Freitag, as Receiver for Superior) (Operations & Asset Sales)

Preliminary Billing FormBilling Atty: 001665 - Fates, Edward
(Ted)

Matter #: 395887.00005

Client Name: Krista Freitag, as Receiver for Superior

Date of Last Billing: 12/23/25

Matter Name: Operations & Asset Sales

Proforma Number: 1381900

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	
09/19/25	10233065	Analyze broker agreement for marketing and sale of boat (.3) discuss same with G. Rodriguez (.1)	Fates, Edward (Ted)	0.40	351.00	351.00	WO	HD	TR
09/23/25	10237913	Analyze draft license agreement for boat slip and discuss same with Receiver	Fates, Edward (Ted)	0.70	614.25	965.25	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.10	877.50	965.25
		1.10		\$965.25
Subtotal Fees				\$965.25
Discount				0.00
Total Fees				965.25
Total Disbursements				0.00

Attorney Billing Instructions

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

01/15/26 12:38:36 PROFORMA STATEMENT FOR MATTER 395887.00005 (Krista Freitag, as Receiver for Superior) (Operations & Asset Sales)

Billing Instructions

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

Account Summary – As Of 01/15/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,140.75	1,140.75	0.00	0.00	0.00	0.00	1,382.40	1,382.40	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	241.65	241.65	0.00	0.00	0.00	0.00	241.65	241.65	0.00
Collected	241.65	241.65	0.00	0.00	0.00	0.00	241.65	241.65	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<i>WIP</i>	<i>1,140.75</i>	<i>1,140.75</i>	<i>0.00</i>						
<i>Balance</i>									
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>						
<i>Unalloc</i>	<i>0.00</i>								
<i>Payment</i>									
<i>Client Trust</i>	<i>0.00</i>								
<i>Balance</i>									

Billing Address

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

01/15/26 12:38:36 PROFORMA STATEMENT FOR MATTER 395887.00006 (Krista Freitag, as Receiver for Superior) (Claims & Distributions)

Preliminary Billing FormBilling Atty: 001665 - Fates, Edward
(Ted)

Matter #: 395887.00006

Client Name: Krista Freitag, as Receiver for Superior

Date of Last Billing: 12/23/25

Matter Name: Claims & Distributions

Proforma Number: 1381900

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			
08/18/25	10192244	Analyze email and attachments from counsel for Merdjanian regarding potential trade creditor claims (.3) discuss same with Receiver (.2) communications with counsel for Merdjanian (.1)	Fates, Edward (Ted)	0.60	526.50	526.50	WO	HD	TR	_____
09/22/25	10236714	Analyze and revise Receiver's case update for investors	Fates, Edward (Ted)	0.40	351.00	877.50	WO	HD	TR	_____

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.00	877.50	877.50
		1.00		\$877.50
Subtotal Fees				\$877.50
Discount				0.00
Total Fees				877.50
Total Disbursements				0.00

Attorney Billing Instructions

01/15/26 12:38:36 PROFORMA STATEMENT FOR MATTER 395887.00006 (Krista Freitag, as Receiver for Superior) (Claims & Distributions)

()	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 01/15/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,228.50	1,228.50	0.00	351.00	351.00	0.00	7,350.30	7,350.30	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	2,174.85	2,174.85	0.00	0.00	0.00	0.00	6,121.80	6,121.80	0.00
Collected	2,174.85	2,174.85	0.00	0.00	0.00	0.00	6,121.80	6,121.80	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	1,228.50	1,228.50	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@ethreadvisors.com E3 Advisors 355 South Grand Avenue, Suite 2450 Los Angeles, CA 90071

01/15/26 12:38:36 PROFORMA STATEMENT FOR MATTER 395887.00009 (Krista Freitag, as Receiver for Superior) (Employment/Fees)

Preliminary Billing FormBilling Atty: 001665 - Fates, Edward
(Ted)

Matter #: 395887.00009

Client Name: Krista Freitag, as Receiver for Superior

Date of Last Billing: 12/23/25

Matter Name: Employment/Fees

Proforma Number: 1381900

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			
07/15/25	10147669	Assist Receiver in preparing 2nd interim fee app (.7) communications with Receiver re: same (.1) communications with local counsel regarding 2nd interim fee application (.2)	Fates, Edward (Ted)	1.00	877.50	877.50	WO	HD	TR	_____
07/17/25	10150336	Follow up communications with local counsel re: second fee application (.3) meet and confer communications with counsel for FTC re: second fee applications (.2)	Fates, Edward (Ted)	0.50	438.75	1,316.25	WO	HD	TR	_____
09/09/25	10220832	Revisions to Receiver's second interim fee application, proposed order and notice of hearing (.3) communications with local counsel re: filing of interim fee applications (.1)	Fates, Edward (Ted)	0.40	351.00	1,667.25	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.90	877.50	1,667.25
		1.90		\$1,667.25

01/15/26 12:38:36 PROFORMA STATEMENT FOR MATTER 395887.00009 (Krista Freitag, as Receiver for Superior) (Employment/Fees)

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
Subtotal Fees				\$1,667.25
Discount				0.00
Total Fees				1,667.25
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 01/15/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,667.25	1,667.25	0.00	0.00	0.00	0.00	2,472.75	2,472.75	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	805.50	805.50	0.00	0.00	0.00	0.00	805.50	805.50	0.00
Collected	805.50	805.50	0.00	0.00	0.00	0.00	805.50	805.50	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	1,667.25	1,667.25	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

01/15/26 12:38:36 PROFORMA STATEMENT FOR MATTER 395887.00009 (Krista Freitag, as Receiver for Superior) (Employment/Fees)

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