

Jarrold L. Rickard, Esq., Bar No. 10203
Email: jlr@semenzarickard.com
SEMENZA RICKARD LAW
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803
Facsimile: (702) 920-8669

Edward G. Fates, Esq. (*pro hac vice admitted*)
Email: tfates@allenmatkins.com
ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
600 West Broadway, 27th Floor
San Diego, CA 92101-0903
Telephone: (619) 233-1155
Facsimile: (619) 233-1158

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

**SEVENTH 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
13 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 Seventh Interim Application for Payment of Fees and Reimbursement of Expenses (“Application”). This Application covers the period from April 1, 2026 through June 30, 2026 (the “Application Period”), and seeks approval of \$34,011.90 in fees and \$9,483.50 in expenses, and an order authorizing the Receiver to pay, on an interim basis, 80% of the fees incurred (\$27,209.52) and 100% of the expenses incurred (\$9,483.50).

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 \$34,011.90 in fees for a total of 40.20 hours worked, and payment on an interim basis of 80% of that amount, or \$27,209.52. 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
Asset Investigation & Recovery	36.20	\$30,501.90
Reporting	1.50	\$1,316.25
Operations & Asset Sales	1.50	\$1,316.25
Claims & Distributions	0.20	\$175.50
Employment/Fees	0.80	\$702.00
Total Fees	40.20	\$34,011.90

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.

1 Allen Matkins has worked diligently and efficiently to assist the Receiver with legal
2 issues facing the receivership estate. The firm's work has allowed the Receiver to preserve
3 and protect the value of receivership estate assets. Therefore, the firm should be
4 compensated on an interim basis for its work.

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

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

7 **1. Asset Investigation & Recovery**

8 The services in this category relate generally to efforts to identify, secure, preserve,
9 investigate and recover receivership assets. During the second quarter of 2026, this work
10 was focused on assisting the Receiver in investigating, developing and potentially settling
11 a significant fraudulent transfer claim relating to the purchase of undeveloped land located
12 on Bent Tree Road in Santa Ana by Receivership Entity Business Done Right, Inc.
13 Settlement offers were exchanged with the seller of the land (Parkside Estates Holdings,
14 Inc. and its principal) and a mediation was held on July 28, 2026, at which time the matter
15 did settle, subject to Court approval. If the settlement is approved (motion is pending),
16 Parkside Estate Holdings will pay the receivership estate \$580,000.

17 The firm also assisted the Receiver in identifying necessary and appropriate
18 subpoena targets, preparing subpoenas, and conferring with recipients regarding any
19 production objections and/or issues. The majority of the subpoena and document
20 management work was performed by an experienced paralegal at a discounted hourly rate
21 of \$409.50. The reasonable and necessary fees for Allen Matkins' work in this category
22 total \$30,501.90.

23 **2. Reporting**

24 Allen Matkins' limited time in this category during the Application Period was
25 focused on assisting the Receiver with her Fifth and Sixth Interim Reports, which were
26 filed on April 2, 2026 (Dkt. 117) and June 8, 2026 (Dkt. 118), respectively. The
27 reasonable and necessary fees for Allen Matkins' work in this category total \$1,316.25.
28

3. Operations & Assets

Allen Matkins' limited time in this category during the Application Period was focused on the boat turned over by Defendant Eric Caldwell, including assisting with a new slip rental agreement and a broker listing agreement. The reasonable and necessary fees for Allen Matkins' work in this category total \$1,316.25.

4. Claims & Distributions

The limited time in this category focused on responding to direct inquiries from consumers about the receivership. The reasonable and necessary fees for Allen Matkins' work in this category total \$175.50.

5. Employment/Fees

Neither the Receiver nor Allen Matkins charge any time for preparing their own detailed fee applications. Allen Matkins assisted the Receiver in preparing her fifth interim fee application. The reasonable and necessary fees for Allen Matkins' work in this category total \$702.00.

B. Summary of Expenses Requested for Reimbursement

Allen Matkins requests that the Court approve reimbursement of \$9,483.50 in out-of-pocket costs. The itemization of such expenses is summarized below by billing category.

Category	Total
Research/PACER Fees	\$11.50
Everlaw eDiscovery	\$22.00
Mediation Fees	\$9,450.00
Total Costs	\$9,483.50

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

1 expenses include the fees and expenses of this Receiver and her professionals, including
2 Allen Matkins. Decisions regarding the timing and amount of an award of fees and costs
3 to the Receiver and her professionals are committed to the sound discretion of the Court.
4 *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992) (rev'd in part on other grounds,
5 998 F.2d 922 (11th Cir. 1993)).

6 In allowing fees, a court should consider “the time, labor and skill required, but not
7 necessarily that actually expended, in the proper performance of the duties imposed by the
8 court upon the receiver. . . , the fair value of such time, labor and skill measured by
9 conservative business standards, the degree of activity, integrity and dispatch with which
10 the work is conducted and the result obtained.” *United States v. Code Prods. Corp.*, 362 F.
11 2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted). In practical terms, receiver
12 and professional compensation thus ultimately rests upon the result of an equitable, multi-
13 factor balancing test involving the “economy of administration, the burden that the estate
14 may be able to bear, the amount of time required, although not necessarily expended, and
15 the overall value of the services to the estate.” *In re Imperial 400 Nat’l, Inc.*, 432 F.2d
16 232, 237 (3d Cir. 1970). Regardless of how this balancing test is formulated, no single
17 factor is determinative and “a reasonable fee is based [upon] all circumstances surrounding
18 the receivership.” *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F. Supp.
19 465, 480 (S.D. Tex. 1974).

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

27 As previously noted, the Receiver promptly determined that utilizing a few third-
28 party vendors and her experienced staff at E3 as well as experienced, qualified counsel was

1 critical due to the lack of records, size and complexity of the receivership estate. Allen
2 Matkins has submitted a detailed fee application which describes the nature of the services
3 rendered. *See* **Exhibit A**. Allen Matkins has endeavored to staff matters as efficiently as
4 possible while remaining cognizant of the complexity of issues presented. As noted above,
5 the request for fees is based on Allen Matkins' customary billing rates charged for
6 comparable services provided in other matters, less a 10% discount. The firm also wrote
7 off and did not charge for 2.70 hours of time (\$2,369.25 in fees).

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

17 **IV. CONCLUSION**

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

- 19 1. Approving Allen Matkins' fees of \$34,011.90;
- 20 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
21 \$27,209.52, from the assets of the Receivership Entities;
- 22 3. Approving Allen Matkins' costs in the amount of \$9,483.50, and authorizing
23 and directing the Receiver to reimburse such costs in full; and

24 ///

25 ///

26 ///

27 ///

28 ///

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

2
3 Dated: October 15, 2026

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

4
5 By: Edward G. Fates

6 EDWARD G. FATES
7 Attorneys for Receiver
8 Krista L. Freitag
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) and not a party to the within action. My business address is 865 S. Figueroa Street, Suite 2800, Los Angeles, California 90017-2543.

On October 15, 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):

SEVENTH 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
- **Reid Abram Tepfer**
rtepferr@ftc.gov
- **Jarrold L. Rickard**
jlr@semenzarickard.com; oak@semenzarickard.com;
alb@semenzarickard.com

The Court's Manual Notice List, lists those not to receive e-mail notice, requiring manual notice of the above described document, as listed below in the manner stated below.

■ **OFFICE MAIL:** By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices for the collection and processing of correspondence for mailing; such correspondence is deposited with the U.S. Postal Service on the same day in the ordinary course of business.

Dennise Merdjanian
811 South Amber Lane
Anaheim, CA 92807

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

Executed on October 15, 2026, at Los Angeles, California.

/s/ Martha Diaz
Martha Diaz

EXHIBIT INDEX

EXHIBIT	DESCRIPTION	PAGE NOS.
Exhibit A	Allen Matkins Leck Gamble Mallory & Natsis LLP Billing Entries	12-29

EXHIBIT A

Allen Matkins Leck Gamble Mallory & Natsis LLP Billing Entries

07/28/26 13:49:41 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: 07/02/26

Matter Name: Asset Investigation & Recovery

Proforma Number: 1416953

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	
04/01/26	10490629	Discuss issues re: potential entitlements consultant for Bent Tree property and potential settlement counteroffer with Receiver and G. Rodriguez	Fates, Edward (Ted)	0.40	351.00	351.00	WO	HD	TR
04/03/26	10491642	Communications with Receiver and counsel for Parkside / Chou regarding property taxes for Bent Tree property	Fates, Edward (Ted)	0.70	614.25	965.25	WO	HD	TR
04/06/26	10521813	Analyze Parkside responses and objections to document subpoena	Fates, Edward (Ted)	0.60	526.50	1,491.75	WO	HD	TR
04/07/26	10495025	Work on meet and confer communication to counsel for Parkside / Chou re: objections to subpoenas (.7) discuss same and issues related to entitlement costs with Receiver and G. Rodriguez (.6) communications with counsel for Parkside / Chou (.3) call from D. Hernandez re: subpoena issued for document (.3)	Fates, Edward (Ted)	1.90	1,667.25	3,159.00	WO	HD	TR
04/13/26	10500502	Discuss issues relating to Schwab defined benefits plan, tax issues, communications from Hernandez and	Fates, Edward (Ted)	1.50	1,316.25	4,475.25	WO	HD	TR

07/28/26 13:49:41 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			
		next steps with Receiver (.4) prepare meet and confer communications to counsel for Parkside / Chou re: objections to document subpoenas (.9) communications with D. Hernandez re: document production pursuant to subpoena (.2)								
04/14/26	10503015	Advise Receiver on communications with D. Hernandez relating to Schwab account and tax issue	Fates, Edward (Ted)	0.20	175.50	4,650.75	WO	HD	TR	_____
04/15/26	10504677	Follow up communications with D. Hernandez re: production of documents pursuant to subpoena (.2) analyze documents produced by D. Hernandez (.9) discuss same with Receiver and G. Rodriguez (.4) advise on Receiver communications with D. Hernandez re: defined benefit plan withdrawal and tax issue (.1)	Fates, Edward (Ted)	1.60	1,404.00	6,054.75	WO	HD	TR	_____
04/16/26	10521895	Follow up communications with counsel for Parkside / Chou re: document production (.2) prepare meet and confer communication to D. Hernandez re: very limited document production in response to subpoena (.5) work on letter to counsel for Parkside / Chou re: facts, legal arguments, and settlement (2.8) discuss Caldwell transaction relating to Bent Tree property and documents for same with Receiver (.4) analyze Caldwell documents (.4)	Fates, Edward (Ted)	4.30	3,773.25	9,828.00	WO	HD	TR	_____

07/28/26 13:49:41 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			
04/17/26	10506681	Continue analysis of arguments and issues and work on meet and confer / settlement letter to counsel for Parkside / Chou (.9) communications with D. Hernandez re: document production (.2) advise Receiver re: same (.2)	Fates, Edward (Ted)	1.30	1,140.75	10,968.75	WO	HD	TR	_____
04/23/26	10514712	Call with counsel for Parkside re: objections to subpoena and document production (.5) follow up communications with D. Hernandez re: document production (.1)	Fates, Edward (Ted)	0.60	526.50	11,495.25	WO	HD	TR	_____
04/24/26	10515494	Review and analyze case files regarding Subpoenaed records, including objections and responses to Subpoenas from Thomas Chou and Parkside Estates Holdings (.1); draft status summary for possible meet and confer (.1); communications with T. Fates (.1).	Pendleton, Michelle	0.30	122.85	11,618.10	WO	HD	TR	_____
04/24/26	10515525	Discuss status of analysis of potential claims against Chou / Parkside, subpoenas issued to same, and settlement strategy with Receiver (.3)	Fates, Edward (Ted)	0.30	263.25	11,881.35	WO	HD	TR	_____
04/27/26	10519287	Review and analyze case files and correspondence regarding outstanding Subpoenas (.3); draft summary of recent responses (.1); draft and finalize status update to K. Freitag and L. Ryan (.4).	Pendleton, Michelle	0.80	327.60	12,208.95	WO	HD	TR	_____
04/27/26	10520810	Analyze and advise re: outstanding subpoenas and next steps (.2) communications with D. Hernandez re: document production (.1) review	Fates, Edward (Ted)	0.70	614.25	12,823.20	WO	HD	TR	_____

07/28/26 13:49:41 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			
		additional batch of documents produced (.4)								
04/28/26	10520825	Communications with counsel for Parkside / Chou re: document production	Fates, Edward (Ted)	0.20	175.50	12,998.70	WO	HD	TR	_____
04/29/26	10522222	Work on draft settlement letter to counsel for Chou / Parkside (.6) discuss same with Receiver and G. Rodriguez (.3)	Fates, Edward (Ted)	0.90	789.75	13,788.45	WO	HD	TR	_____
04/30/26	10524595	Review communications regarding supplemental production from David Hernandez (in response to Subpoena) and update subpoena summary regarding the same.	Pendleton, Michelle	0.10	40.95	13,829.40	WO	HD	TR	_____
05/01/26	10528734	Communications with counsel for Chou / Parkside re: document production (.1) initial analysis of Chou / Parkside joint document production pursuant to subpoenas and advise on next steps for review (.7) review and analysis of document production (2.7)	Fates, Edward (Ted)	3.50	3,071.25	16,900.65	WO	HD	TR	_____
05/01/26	10531939	Analysis and determination of document productions.	Peng, Simona	0.50	204.75	17,105.40	WO	HD	TR	_____
05/04/26	10532016	Review and analyze documents produced by Chou / Parkside (.9) discuss same with Receiver and G. Rodriguez (.3)	Fates, Edward (Ted)	1.20	1,053.00	18,158.40	WO	HD	TR	_____
05/04/26	10532428	Analysis and determination of document productions.	Peng, Simona	0.50	204.75	18,363.15	WO	HD	TR	_____

07/28/26 13:49:41 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			
05/05/26	10533462	Communications with G. Rodriguez re: Parkside / Chou issues and revisions to settlement letter (.7) work on revisions (.8) discuss same with Receiver (.4)	Fates, Edward (Ted)	1.90	1,667.25	20,030.40	WO	HD	TR	_____
05/06/26	10534909	Communications with counsel for Chou / Parkside re: supplement to document production	Fates, Edward (Ted)	0.20	175.50	20,205.90	WO	HD	TR	_____
05/07/26	10535994	Analyze supplemental Chou doc production (.3) discuss facts, legal issues, and settlement letter to Chou / Parkside with Receiver and G. Rodriguez (.7) revise and finalize letter (.2)	Fates, Edward (Ted)	1.20	1,053.00	21,258.90	WO	HD	TR	_____
05/12/26	10541818	Analyze communication from FTC counsel re: Hernandez tax liability issue (.1) discuss same with Receiver (.3) analyze law re: tax claims and turnover of funds to FTC (.4)	Fates, Edward (Ted)	0.80	702.00	21,960.90	WO	HD	TR	_____
05/15/26	10545876	Review case files and update summary of subpoenas issues and documents received as needed (.3); communications with K. Freitag regarding status and potential new subpoena(s) (.2).	Pendleton, Michelle	0.50	204.75	22,165.65	WO	HD	TR	_____
05/15/26	10562573	Communications with counsel for Parkside / Chou re: settlement issues	Fates, Edward (Ted)	0.30	263.25	22,428.90	WO	HD	TR	_____
05/22/26	10556153	Analyze letter from counsel for Parkside / Chou and advise Receiver re: same	Fates, Edward (Ted)	0.80	702.00	23,130.90	WO	HD	TR	_____

07/28/26 13:49:41 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			
05/26/26	10558288	Analyze issues and prepare initial response to counsel for Chou / Parkside (.7) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.90	789.75	23,920.65	WO	HD	TR	_____
05/29/26	10569635	Analyze letter from Chou re: offer to transfer land parcels to Receiver and letter from counsel for Parkside / Chou re: settlement (.5) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.70	614.25	24,534.90	WO	HD	TR	_____
06/01/26	10571007	Analyze D. Hernandez tax issues relating to hold back from withdrawal and termination of BDR defined benefit plan (.3) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.50	438.75	24,973.65	WO	HD	TR	_____
06/03/26	10573747	Call with Receiver and FTC counsel to discuss Chou / Parkside matter and related issues (.6) follow up emails re: same (.2)	Fates, Edward (Ted)	0.80	702.00	25,675.65	WO	HD	TR	_____
06/08/26	10579747	Call with Receiver and FTC counsel re: issues relating to Chou / Parkside, boat and vehicle (.3) discuss same with Receiver (.2) prepare draft settlement communication to counsel for Chou / Parkside (.3)	Fates, Edward (Ted)	0.80	702.00	26,377.65	WO	HD	TR	_____
06/10/26	10582443	Discuss revised settlement communication to counsel for Chou / Parkside with Receiver (.2) finalize and send same (.2)	Fates, Edward (Ted)	0.40	351.00	26,728.65	WO	HD	TR	_____
06/15/26	10588648	Emails and call with counsel for Parkside / Chou re: possible settlement (.7) advise client re: same (.2)	Fates, Edward (Ted)	0.90	789.75	27,518.40	WO	HD	TR	_____

07/28/26 13:49:41 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			
06/17/26	10592974	Advise Receiver on issues relating to defined benefit plan and income taxes	Fates, Edward (Ted)	0.20	175.50	27,693.90	WO	HD	TR	_____
06/18/26	10594793	Settlement communications with counsel for Chou / Parkside (.2) advise Receiver re: same (.1)	Fates, Edward (Ted)	0.30	263.25	27,957.15	WO	HD	TR	_____
06/22/26	10596104	Research and analysis of potential mediator candidates for Chou / Parkside claims (.6) discuss same with Receiver (.3) communications with counsel for Chou / Parkside re: same (.2)	Fates, Edward (Ted)	1.10	965.25	28,922.40	WO	HD	TR	_____
06/23/26	10599413	Further communications with counsel for Chou / Parkside re: selection of mediator and scheduling	Fates, Edward (Ted)	0.40	351.00	29,273.40	WO	HD	TR	_____
06/25/26	10603155	Communications with counsel for Chou / Parkside re: mediator and mediation date (.2) discuss same with Receiver (.2)	Fates, Edward (Ted)	0.40	351.00	29,624.40	WO	HD	TR	_____
06/26/26	10604303	Further communications with Receiver and counsel for Parkside / Chou re: mediation scheduling and logistics (.8) communications with mediator's assistant (.1)	Fates, Edward (Ted)	0.90	789.75	30,414.15	WO	HD	TR	_____
06/29/26	10607513	Communications with mediator's assistant re: scheduling and case information	Fates, Edward (Ted)	0.10	87.75	30,501.90	WO	HD	TR	_____

Disbursements for Matter 395887.00003 (Asset Investigation & Recovery)

Trans Date	Index	Type	Quantity	Amt
-------------------	--------------	-------------	-----------------	------------

07/28/26 13:49:41 PROFORMA STATEMENT FOR MATTER 395887.00003 (Krista Freitag, as Receiver for Superior) (Asset Investigation & Recovery)

Disbursements for Matter 395887.00003 (Asset Investigation & Recovery)

Trans Date	Index	Type	Quantity	Amt	WO	HD	TR	
04/07/26	3001006	DCSRCH – Document Search - PACER - Usage 1st QTR	0.00	11.50	WO	HD	TR	_____
05/31/26	3001358	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for May 2026	0.00	11.00	WO	HD	TR	_____
06/29/26	3002427	MEDIT – ADR Services, Inc. - Mediation Hearing - 07/28/2026	0.00	9,450.00	WO	HD	TR	_____
06/30/26	3006500	EDISC – Sandline Discovery LLC - Everlaw eDiscovery technology and services for June 2026	0.00	11.00	WO	HD	TR	_____

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	33.50	877.50	29,396.25
002307	Peng, Simona	1.00	409.50	409.50
002603	Pendleton, Michelle	1.70	409.50	696.15
		<u>36.20</u>		<u>\$30,501.90</u>
Subtotal Fees				\$30,501.90
Discount				0.00
Total Fees				30,501.90
Total Disbursements				9,483.50

Attorney Billing Instructions

()	BILL ALL	()	Hold
()	BILL FEES ONLY	()	Write Off
()	BILL COST ONLY	()	<u>Transfer All</u>

Billing Instructions

expires 6/30/2027: 10% off standard rates (automatic) no text editing; copies @ .10

Account Summary – As Of 07/28/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	5,648.05	5,602.05	46.00	85,302.20	75,818.70	9,483.50	278,357.82	268,874.32	9,483.50

07/28/26 13:49:41 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	3.14	3.14	0.00
Billed	41,959.44	41,959.44	0.00	41,959.44	41,959.44	0.00	89,867.41	89,867.41	0.00
Collected	41,959.44	41,959.44	0.00	41,959.44	41,959.44	0.00	89,867.41	89,867.41	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	188,487.65	179,004.15	9,483.50
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

07/28/26 13:49:41 PROFORMA STATEMENT FOR MATTER 395887.00004 (Krista Freitag, as Receiver for Superior) (Reporting)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward Matter #: 395887.00004 Client Name: Krista Freitag, as Receiver for Superior
 (Ted)
 Date of Last Billing: 07/02/26 Matter Name: Reporting
 Proforma Number: 1416953
 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	
04/02/26	10489436	Finalize Receiver's Fifth Interim Report (.2) discuss same with Receiver (.1)	Fates, Edward (Ted)	0.30	263.25	263.25	WO	HD	TR
05/05/26	10534017	Work on Receiver's 6th interim report (.8) discuss same with Receiver (.1)	Fates, Edward (Ted)	0.90	789.75	1,053.00	WO	HD	TR
06/08/26	10579875	Finalize Receiver's sixth interim report	Fates, Edward (Ted)	0.30	263.25	1,316.25	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.50	877.50	1,316.25
		1.50		\$1,316.25
Subtotal Fees				\$1,316.25
Discount				0.00
Total Fees				1,316.25
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL () Hold

07/28/26 13:49:41 PROFORMA STATEMENT FOR MATTER 395887.00004 (Krista Freitag, as Receiver for Superior) (Reporting)

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

Billing Instructions

expires 6/30/2027: 10% off standard rates (automatic) no text editing; copies @ .10

Account Summary – As Of 07/28/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	3,685.50	3,685.50	0.00	14,760.00	14,760.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	1,691.55	1,691.55	0.00	1,691.55	1,691.55	0.00	7,652.25	7,652.25	0.00
Collected	1,691.55	1,691.55	0.00	1,691.55	1,691.55	0.00	7,652.25	7,652.25	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP Balance	7,107.75	7,107.75	0.00						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

07/28/26 13:49:41 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: 1416953

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	
04/14/26	10503347	Analyze slip rental agreement for boat to be sold and discuss same with G. Rodriguez	Fates, Edward (Ted)	1.20	1,053.00	1,053.00	WO	HD	TR
04/15/26	10504526	Call with G. Rodriguez to discuss new listing agreement for boat broker and new lease for boat slip	Fates, Edward (Ted)	0.30	263.25	1,316.25	WO	HD	TR

Proforma Summary**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	1.50	877.50	1,316.25
		1.50		\$1,316.25
Subtotal Fees				\$1,316.25
Discount				0.00
Total Fees				1,316.25
Total Disbursements				0.00

Attorney Billing Instructions

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

07/28/26 13:49:41 PROFORMA STATEMENT FOR MATTER 395887.00005 (Krista Freitag, as Receiver for Superior) (Operations & Asset Sales)

Billing Instructions

expires 6/30/2027: 10% off standard rates (automatic) no text editing; copies @ .10

Account Summary – As Of 07/28/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	3,159.00	3,159.00	0.00	4,541.40	4,541.40	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	241.65	241.65	0.00
Collected	0.00	0.00	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
WIP	4,299.75	4,299.75	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

07/28/26 13:49:41 PROFORMA STATEMENT FOR MATTER 395887.00006 (Krista Freitag, as Receiver for Superior) (Claims & Distributions)

Preliminary Billing Form

Billing Atty: 001665 - Fates, Edward (Ted) Matter #: 395887.00006 Client Name: Krista Freitag, as Receiver for Superior
 Date of Last Billing: 12/23/25 Matter Name: Claims & Distributions
 Proforma Number: 1416953
 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
04/15/26	10505412	Respond to direct inquiry from counsel representing consumer	Fates, Edward (Ted)	0.20	175.50	175.50	WO	HD TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.20	877.50	175.50
				\$175.50
Subtotal Fees				\$175.50
Discount				0.00
Total Fees				175.50
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2027: 10% off standard rates (automatic) no text editing; copies @ .10

07/28/26 13:49:41 PROFORMA STATEMENT FOR MATTER 395887.00006 (Krista Freitag, as Receiver for Superior) (Claims & Distributions)

Account Summary – As Of 07/28/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	189.90	189.90	0.00	716.40	716.40	0.00	7,715.70	7,715.70	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	6,121.80	6,121.80	0.00
Collected	0.00	0.00	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
<i>WIP</i>	<i>1,593.90</i>	<i>1,593.90</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

07/28/26 13:49:41 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: 1416953

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	
06/22/26	10595949	Assist in preparing Receiver's fifth interim fee application (.5) discuss same with Receiver (.1)	Fates, Edward (Ted)	0.60	526.50	526.50	WO	HD	TR
06/23/26	10599752	Advise Receiver on local counsel fee issues	Fates, Edward (Ted)	0.20	175.50	702.00	WO	HD	TR

Proforma Summary**Timekeeper**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.80	877.50	702.00
		0.80		\$702.00
Subtotal Fees				\$702.00
Discount				0.00
Total Fees				702.00
Total Disbursements				0.00

Attorney Billing Instructions

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

07/28/26 13:49:41 PROFORMA STATEMENT FOR MATTER 395887.00009 (Krista Freitag, as Receiver for Superior) (Employment/Fees)

Billing Instructions

expires 6/30/2027: 10% off standard rates (automatic) no text editing; copies @ .10

Account Summary – As Of 07/28/26

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	2,544.75	2,544.75	0.00	5,017.50	5,017.50	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	805.50	805.50	0.00
Collected	0.00	0.00	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	4,212.00	4,212.00	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