

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 23-24903-CIV-JB

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

RISHI KAPOOR, et al.,

Defendants.

**RECEIVER’S FIRST INTERIM APPLICATION TO AUTHORIZE PAYMENT
OF FEES AND EXPENSES OF RECEIVER AND HER PROFESSIONALS**

Bernice C. Lee, the Receiver (“Receiver”) appointed by the Court’s Order [DE 28] (“Receivership Order”) entered on January 12, 2024, hereby submits her First Interim Application to Authorize Payment of Fees and Expenses of Receiver and Her Professionals (the “Application”) as required by the Receivership Order. The Application is the first interim application for payment of fees and expenses submitted by the Receiver and covers the period from January 12, 2024 through March 31, 2024 (the “Application Period”).¹

I. General Summary

This receivership involves twenty-two entities named as defendants² (collectively, the “Receivership Defendants”), over twenty subsidiaries and related entities, seven real estate

¹ The Receiver seeks authorization to immediately pay all fees and expenses less a hold-back of 20% (as to fees); and (2) authorization to pay the 20% hold-back upon the filing a final application.

² The Receivership Defendants are: Location Ventures, LLC, URBIN, LLC, Patriots United, LLC; Location Properties, LLC; Location Development, LLC; Location Capital, LLC; Location Ventures Resources, LLC; Location Equity Holdings, LLC; Location GP Sponsor, LLC; 515 Valencia Sponsor, LLC; LV Montana Sponsor, LLC; URBIN Founders Group, LLC; URBIN CG Sponsor, LLC; 515 Valencia Partners, LLC; LV Montana Phase I, LLC; Stewart Grove 1, LLC; Stewart Grove 2, LLC;

projects, and over twenty-five pre-receivership cases pending in Florida state and federal courts. As reflected in the attached invoices, the total amount of fees and expenses incurred by the Receiver and each of her professionals³ during the Application Period is as follows: (a) for the Receiver, fees in the amount of \$140,140.00 and no expenses, *see Exhibit A*, (b) for Kozyak Tropin & Throckmorton, LLP (“KTT”), fees in the amount of \$159,900.00 and expenses in the amount of \$9,373.63), *see Exhibit B*, (c) for Yip Associates, fees in the amount of \$203,150.00 and \$155.07 in expenses, *see Exhibit C*, and (d) for Day Pitney LLP, fees in the amount of \$12,648.50 and no expenses, *see Exhibit D*.

The Receiver’s fees and average hourly billing rate represent significant savings to the receivership estate due in substantial part to the discount the Receiver and her professionals have applied to all time on this matter, and the efficient utilization of her team’s expertise and experience in forensic accounting, and asset disposition efforts.

For purposes of this representation, KTT reduced its partner attorney rates from \$775-\$960 to \$350 per hour, of counsel rates from \$700-800 to \$300 per hour, associate rates from \$400-\$575 to \$250 per hour, and paralegal rate from \$265 to \$150 per hour. Yip Associates reduced its partner attorney rates from \$450-\$600 per hour to \$350 per hour, manager or director rates from \$350-400 to \$300 per hour, associate rates from \$275-295 to \$250 per hour, and paralegal rate from \$150 to \$140 per hour. Day Pitney reduced its partner attorney rates from

Location Zamora Parent, LLC; URBIN Coral Gables Partners, LLC; URBIN Coconut Grove Partners, LLC; URBIN Miami Beach Partners, LLC; and URBIN Miami Beach II Phase 1, LLC.

³ As required by the SEC’s Billing Agreement, the Fee Schedule reflecting the names and hourly rates of all of the Receiver’s professionals and paraprofessionals are fully set forth in each firm’s respective invoices attached hereto as Exhibits B, C and D. Kozyak Tropin & Throckmorton, LLP has a core group of attorneys primarily responsible for most matters involved in this case, but in certain instances has brought in other attorneys – particularly associates at lower billable rates – to work on discrete tasks where appropriate.

\$645-950 to \$350 per hour, associate rates from \$345-525 to \$250 per hour, and paralegal rate from \$205-400 to \$150 per hour.

II. Overview of the Receivership Case

As set forth in the Receiver's Firm Interim Report filed on April 30, 2024 [DE 127], the focus of the Receiver's efforts in the Application Period has been on identifying and securing the receivership assets and books and records, assessing the various real estate properties and related values and potential dispositions, and addressing pending litigation and creditor and investor inquiries. The Receiver obtained court approval and closed on the sale of one real estate parcel, and reached a settlement agreement with the secured lender for another property, approval of which is presently pending before the Court.

The Receiver also began the process of investigating the inflows and outflows of funds among the Receivership Defendants and related entities, including and customer deposits for certain properties. This Application Period reflects the early days of this receivership where identifying and understanding the massive volume of information has been time-consuming but will help pave the way for the efficient administration of this receivership estate. A summary of the Receiver's time by category and the Receiver's invoices are attached as Exhibit A. The Standardized Fund and Accounting Report required by the SEC is attached as **Exhibit E**.

III. Services Rendered During the Application Period

a. The Receiver and KTT

i. Asset Disposition

During the Application Period, the Receiver and KTT devoted a substantial amount of time to the "Asset Disposition" category in order to assess various real estate properties, including their debt structure, loan transactions, funding provided by lenders and others, and

related claims. The Receiver and her counsel have had several meetings and phone conferences with lenders, landlords, creditors, and other parties related to the various properties. A summary of the real estate properties and tasks performed during the Application Period is provided below:

Minorca Parcel: Urbin CG RESI SPE LLC, a wholly owned subsidiary of Urbin Coral Gables Partners, LLC, owned a vacant lot on Minorca Avenue in Coral Gables, Florida, folio no. 03-4108-006-1200. After investigating and assessing options, on January 29, 2024, the Receiver filed a Motion for Authority to Close on Pending Sale and to Approve Sale [DE 58] to close on a pending sale contract of the vacant lot for \$800,000. On January 30, 2024, the Court entered an Order granting the motion and approving the sale. The sale closed, and the receivership estate received the net proceeds on March 1, 2024.

299 Alhambra Building and Personal Property: CG Office SPE, LLC, a wholly owned subsidiary of Urbin Coral Gables Partners, LLC, owns an office building located at 299 Alhambra Circle in Coral Gables, Florida. The Receivership Defendants occupied the ground floor and offices 319, 401, 406, 510, 512, and 519 – 521 in the building. After investigating the marketing history of the property, the debt structure, and alternatives for disposition, on February 28, 2024, the Receiver filed a Motion for Approval of Settlement and Authority to Consent to Foreclosure Judgment [DE 91] seeking approval of a settlement with the lender. Under the settlement, the Lender will provide a \$100,000 payment to the receivership estate, CG Office SPE will consent to the entry of a consent final judgment, and the Receiver will have sixty days to administer the Receivership Defendants' personal property in the building. Rishi Kapoor filed a response in opposition to the motion on March 4, 2024 [DE 95]. The Receiver filed a reply in support of her motion on March 5, 2024 [DE 96]. The matter is fully briefed and pending before

the Court. With respect to the personal property, on March 7, 2024, the Receiver filed a Motion to Approve Employment of Auctioneer and Auction Sale of Personal Property [DE 99], and on March 22, 2024, the Court entered an Order granting the motion, and providing that the Receiver is authorized to employ the auctioneer and conduct an auction of the personal property on April 19, 2024 or such other time as determined by the Receiver [DE 109].

Stewart Grove: Stewart Grove 1, LLC owns a luxury single family home constructed on real property located across two parcels: 3620 Stewart Avenue, Miami, Florida 33133 (folio no. 01-4128-051-0010), and 3610 Stewart Avenue, Miami, Florida 33133 (folio no. 01-4128-051-0020). The Receiver and her counsel have spent a significant amount of time assessing a potential sale or other avenue of administering the Stewart Grove property, including conducting a site visit and in person meeting with the first mortgage lender representative and counsel at the property, numerous conference calls with the lender, reviewing the loan transactions and funding for the property, engaging in several conference calls and email correspondence with a potential purchaser, negotiating, drafting and reviewing a potential sale contract, reviewing various documents relating to lien claimants, and attending to conference calls and email correspondence with lien claimants and other parties relating to the property.

Miami Beach: Urbin Miami Beach Owner, LLC, a wholly owned subsidiary of Urbin Miami Beach Mezzanine, LLC, owns two adjacent parcels located in Miami Beach: 1260 Washington Avenue consisting of primarily vacant land, folio no. 02-4203-009-0040; and 1234 Washington Avenue with an office building, folio no. 02-4203-009-0050. The Receiver and her counsel have expended a significant amount of time assessing these properties, including conducting a site visit with the lender, reviewing the loan transactions and funding for the property, evaluating options for the proposed disposition of the property, preparing a non-

disclosure agreement for prospective buyers, communicating with interested parties regarding potential sale of the property, investigating the status of the permits and entitlements associated with the property, drafting court papers to employ a broker/auctioneer, and reviewing issues raised by, and communicating with, the escrow agent, surety and the Florida Division of Condominiums, Timeshares, and Mobile Homes regarding purchaser deposits and escrow bond.

Commodore/Coconut Grove: Urbin Coconut Grove Partners, LLC is the 100% owner and/or manager of the following four entities that own real property and/or leasehold rights: (a) Urbin Commodore Residential SPE, LLC owns 29 condominium or retail units in a building located at 3162 Commodore Plaza, Miami, FL 33133, (b) Urbin Commodore Residential II SPE, LLC owns a parcel, folio no. 01-4121-047-0060, with an address of 3170 Commodore Plaza, Miami, FL 33133, and is the leasee under a ground lease with Dharma Studio, Inc. for real property located at 3166 Commodore Plaza, Miami, FL 33133, folio no. 01-4121-047-0070, (c) Urbin Commodore SPE, LLC is a lessee under a ground lease with TB 3138 Commodore Investments, LLC for real property located at 3138 Commodore Plaza, Miami, FL 33133, folio no. 01-4121-047-0130, and (d) Urbin Commodore Restaurant SPE, LLC is a lessee under a ground lease with TB 3138 Commodore Investments, LLC for real property located at 3120 Commodore Plaza, Miami, FL 33133, folio no. 01-4121-047-0120. The Receiver filed a motion to employ appraiser for the Commodore properties on March 19, 2024 [DE 106], and the Court entered an Order granting the motion on March 22, 2024 [DE 111]. The Receiver and her counsel have expended a significant amount of time assessing these properties, including conducting a site visit of all parcels with an appraiser, having numerous calls with the lender and landlord, reviewing the loan transactions, ground leases and funding for the property, communicating with interested parties regarding potential sale of the properties, and reviewing

issues raised by, and communicating with, the escrow agent, surety and the Florida Division of Condominiums, Timeshares, and Mobile Homes regarding purchaser deposits and escrow bond.

Villa Valencia Condos: 515 Valencia SPE, LLC, a wholly owned subsidiary of 515 Valencia Partners, LLC, owns four condominium units in a condominium building located at 515 Valencia Ave., Coral Gables, Florida 33134: (a) Unit 1301, folio no. 03-4117-096-0120, (b) Unit 1104, folio no. 03-4117-096-0390, (c) Unit 1202, folio no. 03-4117-096-0110, which is subject to a sale contract and related litigation, and (d) Unit 1201, folio 03-4117-096-0230, which is subject to a sale contract and related litigation. The Receiver filed a motion to employ appraiser for the condos on April 2, 2024 [DE 113], and the Court entered an Order granting the motion on April 4, 2024 [DE 116]. The Receiver and her counsel have spent a meaningful amount of time conducting numerous calls with the lenders, reviewing and conducting calls with the City of Coral Gables, the condominium association and other parties regarding issues relating to the temporary certificate of occupancy, and attending meetings and calls with purchasers and other creditors.

Montana: 7240 US Highway 2 SPE, LLC, a wholly owned subsidiary of LV Montana Phase I, LLC, owns real property consisting of 12.37 acres with an address of 7240 US Highway 2 E, Columbia Falls, Montana 59912 (folio no. 07-4186-15-2-09-30-0000). The Receiver has spent a meaningful amount of time reviewing and drafting documents relating to the potential engagement of a real estate broker for this property, and having multiple conference calls with the broker regarding the property, receivership estate and SEC action.

Additional assets related to the receivership case include a luxury residence located at 7233 Los Pinos Blvd, Coral Gables, Florida owned by 7233 Los Pinos LLC, an entity Rishi Kapoor has stated that he and Jeannie Frank Kapoor own through an entity named Kapoor, LLC,

which recently filed a voluntary chapter 11 bankruptcy petition and was subject to a foreclosure action, and a 68' 2023 Princess yacht subject to a mortgage in excess of \$4.2 million and maritime foreclosure action by the lender. These assets are subject to the Asset Freeze Order entered by the Court [DE 10] and the Receiver may have claims against the assets and/or claims against Mr. Kapoor relating to these assets.

ii. Asset Analysis and Recovery

During the Application Period, the Receiver and her professionals devoted a considerable amount of time investigating and identifying real and personal property of the Receivership Defendants and related entities, identifying and securing books and records, including: QuickBooks and Sage accounts, Google Workspace accounts and emails, and a network attached storage device. Immediately upon her appointment, the Receiver issued notices to several financial institutions to locate bank accounts and provide notice of her appointment. The Receiver has issued subpoenas to six financial institutions to obtain financial records relating to the Receivership Defendants and transactions involving the Receivership Defendants, and obtained various records and documents from attorneys, accountants and escrow agents who provided services to the Receivership Defendants. With respect to the 299 Alhambra offices, the Receiver changed the locks for all offices used by the Receivership Defendants, and secured all records, documents, computer equipment and other items on site.

iii. Case Administration

During the Application Period, the Receiver and her counsel spent a substantial amount of time addressing case administration matters, including: (i) conducting meetings and follow-up calls with the following individuals: Retired Judge Alan Fine, the former liquidating manager for certain Location Venture companies, and the three individuals that he worked with as the

liquidating manager: Vivian Bonet, Raymond Gonzalez and Jorge Chirinos, (ii) attending various virtual meetings and conference calls with counsel for Rishi Kapoor and/or the SEC to discuss proposed and pending motions, QuickBooks and Sage records, and ESI/discovery issues, (iii) reviewing and analyzing an efficient and cost-effective procedure to address the parties' ESI and discovery requests, (iv) establishing and updating the Receiver's website which contains court documents and a section where investors and other claimants can include their contact information (<https://kttlaw.com/lv/>), (v) with respect to the over twenty-five Florida state and federal court proceedings that were pending at the time that the Court entered the Receivership Order, providing notice of the receivership stay, communicating with plaintiffs and other parties involved in the cases, attending certain hearings and status conferences, and monitoring the status of the cases, (vi) addressing ongoing attempts by certain parties to serve certain Receivership Defendants via service on the Receiver, (vii) attending to issues relating to taxes and utilities for certain real properties and the temporary certificate of occupancy and related issues for the Villa Valencia building, (viii) reviewing and analyzing issues relating to escrow deposits, release of funds and bond claims for the Miami Beach and Commodore properties, and conducting multiple calls with attorneys for unit purchasers and surety, and the Florida Division of Condominiums, Timeshares, and Mobile Homes, and (ix) searching and reviewing documents relating to the Receivership Defendants and related entities to address requests from various parties.

iv. Claims Administration

During the Application Period, the Receiver and her counsel spent a meaningful amount of time attending to calls and emails with investors, lien claimants, unit purchasers and other claimants to discuss the SEC action, Receivership Order, potential claims process, and issues

relating to particular properties. Shortly after her appointment, the Receiver included a section on the website (<https://kttlw.com/lv/>) where claimants can enter their contact information which the Receiver will use to provide notice in the event there is a claims process.

v. Employment Applications

The Receiver has had numerous discussions with proposed professionals, reviewed proposals and drafted motions to employ and related affidavits and proposed orders. The Court has approved the Receiver's employment of various professionals during the Application Period, including real estate counsel, forensic accountants, an auctioneer for certain personal property, and appraisers for certain real properties.

b. Yip Associates

On January 19, 2024, the Court entered an Order granting the Receiver's Motion for Authorization of Employment of Maria M. Yip and Yip Associates as Forensic Accountants Retroactive to January 12, 2024 [DE 38]. The Receiver employed Yip Associates to review, reconstruct and analyze the Receivership Defendants' financial records, funding transactions, purchaser deposits, and provide additional forensic accounting and tax accounting services.

During the Application Period, the forensic accountants have assisted the Receiver with: on-site review and gathering of documents of the 299 Alhambra building offices, accessing and reviewing various QuickBooks and Sage accounts, considering financial accounts and the status of records and missing records, analyzing tax documents and operating agreements, analyzing bank records and prepare reconstruction, analyzing lender documents and transactions for certain properties, and analyzing purchaser deposit and escrow documents. The forensic accountants have been required to review, analyze, and digest a substantial amount of information, much of

which is not well organized, in a brief period of time, in order to assist the Receiver in obtaining required information on the financial condition and transactions of the Receivership Companies.

c. Day Pitney

On March 22, 2024, the Court entered an Order granting the Receiver's Motion for Authorization of Employment of Day Pitney LLP as Counsel Retroactive to March 7, 2024 [DE 110]. The Receiver employed Day Pitney to assist with real estate transaction matters.

During the Application Period, Day Pitney has assisted the Receiver with: review and revisions of the sale contract, addendum and title commitment for the potential sale of the Stewart Grove property, communicating with the lender and potential purchaser for same, review and revisions of a confidentiality agreement for the Miami Beach properties, review of documents from and discussions with potential realtor for Montana relator regarding revisions to same, analyzing issues relating to resignation letter from escrow agent for Miami Beach properties, and attending meetings and conference calls with counsel for surety for escrow bonds and the Florida Division of Condominiums, Timeshares, and Mobile Homes regarding purchaser deposits and bond claims.

IV. Standardized Fund Accounting Report

The SEC's Standardized Fund Accounting Report for the Application Period is attached hereto as Exhibit E. As of March 31, 2024, the Receivership Estate has cash on hand in the amount of \$2,191,843.98, which the Receiver is holding in the receivership account at Ocean Bank.

V. Request for Fees and Expenses

The Receivership Order provides for reasonable compensation and expense reimbursement to be paid to the Receiver and her retained professionals from the assets held by

the Receivership Estate. By this Application, the Receiver is proposing that the Court approve all of the fees and expenses incurred by the Receiver and each of her professionals during the Application Period, and authorize the distribution for payment of 100% of such expenses and 80% of such fees (with a holdback of 20% of the fees). This is the Receiver's first request for approval of compensation and reimbursement of expenses incurred by the Receiver and each of her professionals. The Receiver proposes that the awarded fees and expenses be paid from the funds currently held in the Receiver's accounts.

Memorandum of Law

The Receiver and her professionals are entitled to reasonable compensation and expenses pursuant to the Receivership Order. A receiver appointed by a court who reasonably and diligently discharges her duties is entitled to be fairly compensated for services rendered and expenses incurred. *See SEC v. Byers*, 590 F. Supp. 2d 637, 644 (S.D.N.Y. 2008); *see also SEC v. Elliott*, 953 F.2d 1560 (11th Cir. 1992) (“[I]f a receiver reasonably and diligently discharges his duties, he is entitled to compensation.”) A receiver and her lawyers are “also entitled to be reimbursed for the actual and necessary expenses they incurred in the performance of their duties.” *Fed. Trade Comm’n v. Direct Benefits Grp., LLC*, Case NO. 6:11-cv-1186-Orl-28TBS, 2013 WL 6408379, at *3 (M.D. Fla. Dec. 6, 2013).

Receivership courts have traditionally determined reasonableness of compensation by using the “lodestar” approach, calculating a reasonably hourly rate in the relevant market and the reasonable number of hours expended. *See, e.g., SEC v. Aquacell Batteries, Inc.*, Case No. 6:07-cv-608-Orl-22DAB, 2008 WL 276026, *3 (M.D. Fla. Jan. 31, 2008); *see also Norman v. Hous. Auth. of Montgomery*, 836 F.2d 1292, 1299-1302 (11th Cir. 1988). The hourly rates billed by the Receiver and her professionals are reasonable for professionals practicing in the Southern

District of Florida, particularly in light of the reduced hourly rates described above, and the services reflected in the attached exhibits were reasonably necessary to the Receiver's performance of her duties as set forth in the Receivership Order.

CERTIFICATION OF CONFERENCE

The Receiver has discussed the relief requested herein with the SEC and is authorized to represent to this Court that, after reviewing the time records and other materials submitted herewith, the SEC does not oppose the relief sought in this Application.

WHEREFORE, Bernice C. Lee, as Receiver, respectfully requests that the Court enter an Order substantially in the same form as the proposed order attached hereto as **Exhibit F**:

- (a) Approving the total amount of fees and expenses for the Application Period of the Receiver in the amount of \$140,140.00 in fees; Kozyak, Tropin & Throckmorton, LLP in the amount of \$159,900.00 in fees and \$9,373.63 in expenses; Yip Associates in the amount of \$203,150.00 in fees and \$155.07 in expenses; and Day Pitney in the amount of \$12,648.50 in fees;
- (b) Authorizing payment of 80% of the approved fees and 100% of the approved expenses from the assets held by the Receivership Estate, as set forth herein; and
- (c) Authorizing payment of the remaining balance of the approved fees (*i.e.*, the 20% holdback) upon final distribution of Receivership assets to investors.

Respectfully submitted,

KOZYAK TROPIN & THROCKMORTON, LLP
2525 Ponce de Leon Boulevard, 9th Floor
Coral Gables, Florida 33134
Tel: (305) 372-1800 / Fax: (305) 372-3508
Email: dlr@kttlaw.com

By: /s/ David L. Rosendorf
David L. Rosendorf
Florida Bar No. 996823
Counsel for Bernice C. Lee, Receiver

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed with the clerk of the Court using CM/ECF, and the foregoing document has been served this 15th day of May, 2024 via CM/ECF upon all counsel of record.

By: /s/ David L. Rosendorf
David L. Rosendorf

CERTIFICATION

The undersigned certifies that:

- (a) I have read this application (“Application”);
- (b) to the best of my knowledge, information and belief formed after reasonable inquiry, the Application and all fees and expenses therein are true and accurate and comply with the Billing Instructions;
- (c) all fees contained in the Application are based on the rates listed in the Exhibits attached hereto and such fees are reasonable, necessary and commensurate with the skill and experience required for the activity performed, and were incurred in the best interests of the receivership estate;
- (d) I have not included in the amount for which reimbursement is sought the amortization of the cost of any investment, equipment, or capital outlay (except to the extent that any such amortization is included within the permitted allowable amounts set forth herein for photocopies and facsimile transmission);
- (e) in seeking reimbursement for a service which I justifiably purchased or contracted for from a third party (such as copying, imaging, bulk mail, messenger service, overnight courier, computerized research, or title and lien searches), I request reimbursement only for the amount billed to me by the third party vendor and paid by me to such vendor. To the extent that such services were performed by me as Receiver, I certify that I am not making a profit as Receiver on such reimbursable service.
- (f) With the exception of the Billing Instructions, I have not entered into any agreement, written or oral, express or implied, with any person or entity concerning the amount of compensation paid or to be paid from the Receivership Estates, or any sharing thereof.

Respectfully submitted and certified,

s/ Bernice C. Lee

Bernice C. Lee, as Receiver

Respectfully submitted this 15th day of May 2024.

EXHIBIT A

RECEIVER’S TIME ENTRIES

Summary of Professionals And Paraprofessional Time

Attorney Name		Licensed	Hours	Rate	Fee
BERNICE C. LEE	Partner	2009	400.40	350.00	140,140.00
Total Hours by Professionals and Paraprofessionals:					400.40
"Blended" Hourly Rate:					350.00
Total Professionals and Paraprofessionals Fees:					140,140.00

* Indicate any changes in hourly rates during this Application and the date of such change

** Indicate "blended" hourly rate.

Summary of Professional And Paraprofessional Time by Activity Code Category

Attorney Name	Licensed	Hours	Rate	Fee
BERNICE C. LEE	2009	43.90	350.00	15,365.00
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Total for Category ASSET ANALYSIS AND RECOVERY		43.90	350.00	15,365.00
-				
BERNICE C. LEE	2009	178.40	350.00	62,440.00
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Total for Category ASSET DISPOSITION		178.40	350.00	62,440.00
-				
BERNICE C. LEE	2009	150.40	350.00	52,640.00
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Total for Category CASE ADMINISTRATION		150.40	350.00	52,640.00
-				
BERNICE C. LEE	2009	8.70	350.00	3,045.00
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Total for Category CLAIMS ADMINISTRATION AND OBJECTIONS		8.70	350.00	3,045.00
-				
BERNICE C. LEE	2009	19.00	350.00	6,650.00
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Total for Category EMPLOYMENT APPLICATIONS (PROFESSIONALS)		19.00	350.00	6,650.00
-				
Grand Total		400.40	350.00	140,140.00

For Professional Services Rendered
 re: 5956-101 SEC V. RISHI KAPOOR, ET AL.

ASSET ANALYSIS AND RECOVERY

January 12, 2024	BCL	Calls and emails with Y. Castro regarding initial steps for receivership order and bank accounts.	0.50	175.00
January 13, 2024	BCL	Prepare chart of various entities and real properties, conduct searches for same, and emails with D. Rosendorf regarding same.	3.00	1,050.00
January 13, 2024	BCL	Emails with bank and Y. Castro regarding response to receivership order.	0.10	35.00
January 14, 2024	BCL	Email Y. Castro regarding Montana property.	0.10	35.00
January 14, 2024	BCL	Review information relating to related entities and real properties, and update notes for same.	0.80	280.00
January 16, 2024	BCL	Calls and emails with various banks regarding asset freeze and account holders.	0.60	210.00
January 17, 2024	BCL	Emails with bank regarding transfer of funds to receivership account.	0.10	35.00
January 17, 2024	BCL	Discussions with R. Gonzalez and M. Yip regarding physical records and related issues.	0.20	70.00
January 18, 2024	BCL	Email with third party financial software provider, update notes for same, and email Y. Castro regarding same.	0.30	105.00
January 18, 2024	BCL	Attend to Google workspace account and shared files, and emails and call with R. Gonzalez regarding same and emails.	1.00	350.00
January 18, 2024	BCL	Review various emails from J. Chirinois regarding bank statements, and update notes for same.	0.40	140.00
January 19, 2024	BCL	Calls and emails with CNB regarding turnover of funds via cashier's checks for receivership.	0.30	105.00

January 19, 2024	BCL	Emails with Regions bank regarding receivership and accounts, and review letter addressing same.	0.20	70.00
January 19, 2024	BCL	Emails with Amerant bank regarding receivership order and accounts.	0.30	105.00
January 19, 2024	BCL	Emails with JP Morgan Chase regarding receivership and accounts.	0.20	70.00
January 21, 2024	BCL	Search for and review company records relating to Coral Gables SPE.	0.50	175.00
January 22, 2024	BCL	Review and revise letter to Chase Bank, review answer, and emails with Y. Castro and bank representative regarding same and turnover.	0.60	210.00
January 22, 2024	BCL	Call and emails with Y. Castro regarding additional banks, and review ██████████ information regarding same.	0.40	140.00
January 22, 2024	BCL	Attend to cashier's checks and bank deposits, and emails with bankers and C. Herskowitz regarding same.	0.60	210.00
January 23, 2024	BCL	Emails with Chase regarding turnover of funds and bank account.	0.10	35.00
January 23, 2024	BCL	Call with R. Gonzalez regarding software, Google workspace, emails, and various data and technology items, prepare for same, and update notes for same.	1.70	595.00
January 23, 2024	BCL	Emails with Y. Castro regarding bank records provided for CNB and Bank of America, and related issues.	0.40	140.00
January 23, 2024	BCL	Call and emails with former LV employee regarding receivership order and removed property.	0.30	105.00
January 23, 2024	BCL	On premises at 299 Alhambra to assess offices and records, meet with locksmith to change locks, and meet with K. Rin and Y. Castro.	2.50	875.00
January 24, 2024	BCL	Calls with O. Abella and Y. Castro regarding 299 Alhambra and locks.	0.30	105.00

January 24, 2024	BCL	Call with R. O'Brien regarding asset freeze and discovery issues.	0.60	210.00
January 24, 2024	BCL	Call and emails with K. Rin regarding Sage and QuickBooks, and update notes for same.	0.40	140.00
January 24, 2024	BCL	Consider issues relating to external storage and Google workspace, call and email R. Gonzalez regarding same, and update notes for same.	0.60	210.00
January 24, 2024	BCL	Review response from US Bank and email Y. Castro regarding same.	0.10	35.00
January 25, 2024	BCL	Calls and discussions with Y. Castro regarding changing lock for ground floor space, and receivership notice.	0.30	105.00
January 26, 2024	BCL	Call with Southeast bank counsel regarding receivership order and letter.	0.10	35.00
January 26, 2024	BCL	Call with former employee with personal property of receivership entities.	0.50	175.00
January 26, 2024	BCL	Change passwords for users in Google workspace, and update notes for same.	0.70	245.00
January 26, 2024	BCL	Emails with R. Gonzalez regarding access to office and remote server access.	0.20	70.00
January 26, 2024	BCL	Call with bank regarding receivership order, and email Y. Castro regarding same.	0.20	70.00
January 29, 2024	BCL	Email former employee regarding personal property of receivership and entities, and call with Y. Castro regarding same.	0.10	35.00
January 29, 2024	BCL	Meeting with R. Gonzalez at 299 Alhambra office to address status of computer backup, network-attached storage, and other programs.	1.60	560.00
January 29, 2024	BCL	Review responses from and emails with various banks regarding receivership order and accounts, and emails with Y. Castro regarding same.	0.70	245.00

January 29, 2024	BCL	Call and emails with G. Garcia and Y. Castro regarding network attached storage and third party vendor.	0.30	105.00
January 31, 2024	BCL	Review banks responses to receivership order, and emails with Y. Castro regarding same.	0.30	105.00
January 31, 2024	BCL	Review and update access for certain email accounts and shared files, and update notes for same.	0.50	175.00
January 31, 2024	BCL	Review file structure within network-attached storage, and outline inventory.	0.80	280.00
February 1, 2024	BCL	Emails with bank regarding response to receivership order.	0.10	35.00
February 1, 2024	BCL	Research case law relating to distributions, lenders and interest.	0.80	280.00
February 2, 2024	BCL	Review issues relating to network access storage and Google workspace, discussions with F. Saint-Remy regarding same, and emails with G. Garcia regarding same.	0.80	280.00
February 2, 2024	BCL	Call with K. Rin and D. Zamorano regarding bank reconstruction and other items, and prepare for same.	0.50	175.00
February 2, 2024	BCL	Compile various documents and information, and email K. Rin and D. Zamorano regarding same.	1.20	420.00
February 2, 2024	BCL	Review proposed motion to continue asset freeze hearing, and emails with F. Schwartz and R. O'Brien regarding same.	0.10	35.00
February 5, 2024	BCL	Review emails and letters from banks regarding receivership order, and email Y. Castro regarding same.	0.30	105.00
February 5, 2024	BCL	Call with R. Gonzalez to discuss issues relating to NAS and Google Workspace, and update notes for same.	1.30	455.00
February 5, 2024	BCL	Emails with G. Garcia regarding NAS and Google Workspace issues.	0.30	105.00
February 7, 2024	BCL	Review records produced by Chase bank and related account	0.30	105.00

Date	Code	Description	Hours	Amount
		Information, and email accountants regarding same.		
February 7, 2024	BCL	Emails with PNC bank regarding receivership order.	0.30	105.00
February 8, 2024	BCL	Consider information regarding bank accounts, QuickBooks and Sage, and calls with K. Rin regarding same.	0.70	245.00
February 8, 2024	BCL	Conference call with MSP4 and R. Neary regarding NAS and data, and review various action item emails.	1.40	490.00
February 8, 2024	BCL	Zoom conference with K. Rin and D. Zamorano regarding bank accounts.	0.40	140.00
February 9, 2024	BCL	Conference call with B. Goodkind and K. Florio regarding documents for transactions and bank statements, and discuss with D. Rosendorf.	0.60	210.00
February 9, 2024	BCL	Attend Google workspace and the NAS preservation and access items, and emails with MSP4 and R. Gonzalez regarding same.	0.80	280.00
February 12, 2024	BCL	Review response from bank, and email Y. Castro regarding same.	0.10	35.00
February 13, 2024	BCL	Review bank account inventory and related issues, and emails with Y. Castro regarding preparing subpoenas for banks and credit card company.	0.50	175.00
February 13, 2024	BCL	Email K. Rin regarding prior accountant report.	0.10	35.00
February 13, 2024	BCL	Discuss P. Gallinar with D. Rosendorf and review letter from same.	0.20	70.00
February 14, 2024	BCL	Emails with R. Gonzalez, J. Chirinos and V. Bonet regarding certain QuickBooks accounts.	0.20	70.00
February 15, 2024	BCL	Consider Google Workspace users on NAS and related summary, and emails and call with D. Rosendorf and B. Widlanski regarding same.	1.00	350.00
February 15, 2024	BCL	Review emails responses regarding certain QuickBooks accounts, and email D. Motha regarding same.	0.20	70.00

February 16, 2024	BCL	Emails with D. Motha and counsel for R. Kapoor regarding access to certain QuickBooks accounts.	0.30	105.00
February 19, 2024	BCL	Review information from insurance broker regarding Commodore project and insurance check, emails with said broker, and update notes for same.	0.40	140.00
February 19, 2024	BCL	Calls and emails with B. Goodkind and K. Florio regarding pick up status for banker's boxes.	0.20	70.00
February 20, 2024	BCL	Prepare document requests for six financial institutions, consider account holder information and service parties, and email Y. Castro regarding same and notice parties.	2.50	875.00
February 21, 2024	BCL	Review R. Kapoor's supplemental accounting, and email and call with D. Rosendorf and K. Rin regarding same.	0.20	70.00
February 21, 2024	BCL	Emails with Y. Castro regarding bank subpoenas, and review information for service of Woodforest.	0.20	70.00
February 26, 2024	BCL	Review notice of subpoenas and related issues, and emails with Y. Castro regarding same.	0.20	70.00
February 27, 2024	BCL	Call and emails with Y. Castro and N. Alawamleh regarding certain personal property.	0.20	70.00
February 28, 2024	BCL	Emails with vendor and K. Rin regarding records from Goodkind.	0.10	35.00
February 28, 2024	BCL	Emails with R. Neary regarding bank account search and related issues.	0.40	140.00
March 7, 2024	BCL	Emails with Y. Castro regarding status of bank subpoenas.	0.10	35.00
March 7, 2024	BCL	Review information regarding IT items, and email R. Gonzalez regarding passwords.	0.20	70.00
March 7, 2024	BCL	Emails with K. Florio regarding bank records.	0.10	35.00
March 7, 2024	BCL	Emails with D. Rosendorf regarding certain bank subpoenas, J. Dobin and M. Mora.	0.20	70.00

March 7, 2024	BCL	Email M. Mora regarding Pensam Funding subpoena.	0.10	35.00
March 11, 2024	BCL	Emails with K. Florio, Y. Castro and accountants regarding bank statements for trust accounts.	0.20	70.00
March 11, 2024	BCL	Call with counsel for Pensam Funding regarding subpoena and document production.	0.20	70.00
March 12, 2024	BCL	Emails with M. Mora regarding subpoena issued to Pensam Funding, and review information for account holder in same.	0.30	105.00
March 15, 2024	BCL	Consider documents provided by P. Gallinar, and email L. Stein regarding reviewing same.	0.30	105.00
March 15, 2024	BCL	Consider certain financial documents located in email account, and email K. Rin and Y. Castro regarding same.	0.30	105.00
March 15, 2024	BCL	Emails with R. Neary and K. Rin regarding statements and other information relating to certain bank accounts.	0.30	105.00
March 20, 2024	BCL	Emails with K. Florio regarding unredacting bank statement.	0.20	70.00
March 22, 2024	BCL	Email K. Florio regarding additional documents to provide.	0.10	35.00
March 22, 2024	BCL	Emails with R. O'Brien regarding wire instructions, review demand letter, and email R. Penalver regarding same.	0.20	70.00
March 26, 2024	BCL	Review emails from counsel for Pensam Funding regarding notice and production deadline extension.	0.10	35.00
March 29, 2024	BCL	Call and emails with Y. Castro regarding Chase and City National Bank production and providing to various parties, and prepare notes on status of pending bank subpoenas.	0.40	140.00
March 29, 2024	BCL	Emails with D. Zamorano and ██████ regarding certain transactions.	0.20	70.00
Total for ASSET ANALYSIS AND RECOVERY			43.90	15,365.00

ASSET DISPOSITION

January 17, 2024	BCL	Call with S. Eslait regarding Minorca, discuss same with D. Rosendorf and review emails regarding same.	0.60	210.00
January 18, 2024	BCL	Discussions with D. Rosendorf regarding Minorca property, 299 Alhambra and related items.	0.80	280.00
January 18, 2024	BCL	Call with interested party for South Beach properties, and discuss with D. Rosendorf.	0.30	105.00
January 18, 2024	BCL	Conference call with J. Perry, F. Schwartz and D. Rosendorf regarding yacht and related litigation, and discuss same with D. Rosendorf.	1.00	350.00
January 18, 2024	BCL	Review sale documents relating to Urbin CG RESI SPE, and emails with V. Benot and S. Eslait regarding same and related issues.	0.80	280.00
January 18, 2024	BCL	Draft motion to approve sale relating to Urbin CG RESI SPE.	0.80	280.00
January 19, 2024	BCL	Call and emails for purchaser for Minorca parcel.	0.50	175.00
January 19, 2024	BCL	Call with A. Carson regarding real estate projects.	0.30	105.00
January 19, 2024	BCL	Conference call with counsel for lender, state court receiver and D. Rosendorf regarding 299 Alhambra, and review documents and pleadings to prepare for same.	1.20	420.00
January 19, 2024	BCL	Discussions with D. Rosendorf regarding issues relating to 299 Alhambra and call with lender.	0.50	175.00
January 19, 2024	BCL	Discuss Valencia property with D. Rosendorf.	0.20	70.00
January 20, 2024	BCL	Consider issues and next steps for Stewart property and related issues, and call with D. Rosendorf to discuss same.	0.50	175.00
January 20, 2024	BCL	Emails with J. Alderman regarding the Stewart property.	0.10	35.00
January 20, 2024	BCL	Emails with A. Carson regarding Minorca parcel.	0.10	35.00

January 21, 2024	BCL	Prepare project for L. Stein for three properties, and call and emails with L. Stein regarding same.	0.60	210.00
January 21, 2024	BCL	Review factual background relating to Minorca parcels, recordings, foreclosure and sale agreements, and draft motion to approve sale of remaining parcel.	2.50	875.00
January 21, 2024	BCL	Research case law relating to sale of property, and draft memorandum of law for motion to approve sale for Minorca parcel.	2.70	945.00
January 21, 2024	BCL	Research waiver of 2001 requirements, and draft stipulation for same.	0.50	175.00
January 21, 2024	BCL	Call with D. Rosendorf regarding motion and stipulation for Minorca parcel.	0.20	70.00
January 22, 2024	BCL	Review and revise stipulation regarding Rule 2001 waiver, and email R. O'Brien regarding same.	0.30	105.00
January 22, 2024	BCL	Review information relating to Montana property, and email Y. Castro regarding search.	0.30	105.00
January 22, 2024	BCL	Call with R. O'Brien and D. Rosendorf regarding stipulation, proposed sale and related issues, and prepare for same.	0.60	210.00
January 22, 2024	BCL	Review and revise proposed order for Minorca parcel sale, and email counsel for buyer regarding same and related issues.	0.30	105.00
January 22, 2024	BCL	Review case law for motion to authorize Minorca parcel sale, review D. Rosendorf's comments to same, and revise said motion.	0.70	245.00
January 22, 2024	BCL	Email with Y. Castro regarding docs and data room provided by J. Alderman.	0.10	35.00
January 23, 2024	BCL	Call and emails with S. Eslait regarding Minorca parcel.	0.30	105.00
January 23, 2024	BCL	Compile exhibits for sale motion for Minorca parcel, and revise sale motion.	0.60	210.00
January 23, 2024	BCL	Call with B. Goodkind regarding Commodore project and related	0.70	245.00

Date	Category	Description	Hours	Amount
		Issues, and discuss with D. Rosendorf.		
January 23, 2024	BCL	Call with P. Humbert regarding 299 Alhambra, and discuss same with D. Rosendorf.	0.30	105.00
January 23, 2024	BCL	Calls with counsel for defendants and plaintiff for yacht case, and discuss with D. Rosendorf.	1.00	350.00
January 23, 2024	BCL	Calls with K. Rin regarding 299 Alhambra, records and individuals at premises, and call with maintenance regarding same.	0.80	280.00
January 23, 2024	BCL	Emails with R. O'Brien and F. Schwartz regarding stipulation to 2001 waiver and related issues, and revise same.	0.40	140.00
January 23, 2024	BCL	Review emails from V. Bonet relating to Minorca parcel.	0.20	70.00
January 24, 2024	BCL	Call with third party regarding Miami Beach project.	0.20	70.00
January 24, 2024	BCL	Review proposed changes to motion, order and certain exhibits for Minorca sale, and emails with S. Eslait regarding same.	0.70	245.00
January 24, 2024	BCL	Call with counsel in Montana relating to real property.	0.20	70.00
January 24, 2024	BCL	Consider spreadsheet of recorded and lender related documents for 299 Alhambra, review certain documents, and emails with L. Stein regarding same.	0.90	315.00
January 24, 2024	BCL	Consider spreadsheet of recorded and lender related documents for Stewart project.	0.60	210.00
January 24, 2024	BCL	Prepare discussion items relating to various projects for call with J. Alderman.	1.30	455.00
January 24, 2024	BCL	Prepare discussion items relating to various projects for call with M. Raymond.	0.80	280.00
January 25, 2024	BCL	Search and review information and documents relating to Montana property, prepare notes, and emails and calls with Y. Castro regarding same.	1.60	560.00

January 25, 2024	BCL	Emails with A. Fine and realtor regarding Montana property.	0.20	70.00
January 25, 2024	BCL	Call and emails with S. Eslait regarding court papers and related documents for Minorca parcel.	0.60	210.00
January 25, 2024	BCL	Call with P. Humbert regarding 299 Alhambra, and update notes for same.	0.30	105.00
January 25, 2024	BCL	Call with third party regarding Montana and other projects.	0.50	175.00
January 25, 2024	BCL	Review documents relating to 299 Alhambra, emails with L. Stein regarding same, and discuss with D. Rosnedorf.	0.50	175.00
January 25, 2024	BCL	Conference call with J. Aldermann and D. Rosendorf, and discussions with D. Rosendorf regarding same.	1.30	455.00
January 25, 2024	BCL	Conference call with M. Raymond, R. Hyman and D. Rosendorf, and discussions with D. Rosendorf regarding same.	1.50	525.00
January 25, 2024	BCL	Consider various issues discussed with S. Eslait regarding proposed motion and order for sale of Minorca property, and revise said court papers.	1.00	350.00
January 25, 2024	BCL	Consider and draft buyer's affidavit regarding no interest for Minorca sale, and email D. Rosendorf regarding same.	0.70	245.00
January 26, 2024	BCL	Review and revise warranty deed and non-foreign certification for Minorca parcel.	0.50	175.00
January 26, 2024	BCL	Research case law regarding real property sales, and revise motion and proposed order for Minorca parcel.	0.70	245.00
January 26, 2024	BCL	Emails with S. Eslait regarding updated title commitment, and revised motion, proposed order and other documents for the Minorca parcel.	0.30	105.00
January 26, 2024	BCL	Consolidate information for Valencia properties.	0.30	105.00

January 26, 2024	BCL	Review notes relating to lender, and email J. Alderman regarding requested information and documents.	0.60	210.00
January 26, 2024	BCL	Review notes relating to lender, and email M. Raymond and R. Hyman regarding requested information and documents.	0.40	140.00
January 29, 2024	BCL	Prepare revised and clean versions of motion, proposed order and exhibits for Minorca parcel, and emails with R. O'Brien, F. Schwartz, S. Eslait and Y. Castro regarding same.	1.50	525.00
January 29, 2024	BCL	Call and emails with potential appraiser regarding two properties.	0.50	175.00
January 29, 2024	BCL	Call with V. Bonet regarding issues relating to Commadore and Valencia properties.	0.80	280.00
January 30, 2024	BCL	Call with A. Almazan and J. Alderman regarding Stewart property, and prepare for same.	0.40	140.00
January 30, 2024	BCL	Call with J. Alderman regarding Stewart and other properties.	0.40	140.00
January 31, 2024	BCL	Emails with S. Eslait regarding entry of sale order for Minorca parcel.	0.10	35.00
January 31, 2024	BCL	Search and review documents relating to 299 Alhambra, and email prior broker regarding same.	0.50	175.00
January 31, 2024	BCL	Emails with J. Perry regarding yacht.	0.10	35.00
January 31, 2024	BCL	Call and emails with J. DeCarlo regarding Montana property.	0.60	210.00
January 31, 2024	BCL	Call with P. Humbert regarding 299 Alhambra.	0.40	140.00
January 31, 2024	BCL	Call with D. Dillworth and J. Post regarding Commodore ground lease, and discuss same with D. Rosendorf.	0.60	210.00
February 1, 2024	BCL	Calls and emails with real estate professionals previously involved with 299 Alhambra.	0.50	175.00
February 1, 2024	BCL	Review court filings and agreements relating to 299	1.00	350.00

		Alhambra, prepare notes for same, and emails with P. Humbert.		
February 1, 2024	BCL	Call with R. Hyman and M. Raymond regarding Commodore and other projections, and update notes for same.	1.60	560.00
February 1, 2024	BCL	Call with N. Zeher regarding yacht and lender's issues.	0.20	70.00
February 1, 2024	BCL	Emails and call with J. Alderman regarding Stewart property.	0.30	105.00
February 1, 2024	BCL	Review emails between J. Alderman, J. Feigeles and F. Schwartz regarding Los Pinos property, and update notes for same.	0.30	105.00
February 1, 2024	BCL	Call with third party regarding Miami Beach property, and updates notes for said property.	0.60	210.00
February 2, 2024	BCL	Call and emails with D. Samole regarding Commodore properties, and summarize pending issues.	1.40	490.00
February 2, 2024	BCL	Review and search documents relating to Commodore, and update notes for same.	0.50	175.00
February 2, 2024	BCL	Call with lien claimant for Valencia and Stewart properties.	0.20	70.00
February 2, 2024	BCL	Call with P. Humbert regarding 299 Alhambra, potential resolution and related issues.	0.40	140.00
February 2, 2024	BCL	Call with R. Hyman regarding Valencia and Commodore properties.	0.40	140.00
February 3, 2024	BCL	Meeting with D. Rosendorf and lender at Stewart property.	3.50	1,225.00
February 3, 2024	BCL	Visit Commodore property with D. Rosendorf.	1.00	350.00
February 4, 2024	BCL	Emails with D. Samole regarding Commodore properties, and interested party.	0.10	35.00
February 4, 2024	BCL	Emails and review emails with J. Alderman and other parties relating to Stewart property.	0.30	105.00
February 5, 2024	BCL	Search and review operating	0.30	105.00

Date	Code	Description	Hours	Amount
		agreements relating to Miami Beach property.		
February 5, 2024	BCL	Meeting with D. Samole and D. Rosendorf regarding Commodore property, and emails regarding same.	1.40	490.00
February 5, 2024	BCL	Review mortgage and notes provided by R. Hyman, and update spreadsheet for same.	0.50	175.00
February 5, 2024	BCL	Consider proposal from P. Humbert, call with D. Rosendorf to discuss same, and emails with P. Humbert.	0.40	140.00
February 6, 2024	BCL	Emails with J. Alderman regarding Miami Beach property, and call with D. Rosendorf regarding same.	0.20	70.00
February 6, 2024	BCL	Call with J. Uribe regarding Stewart and Valencia properties.	0.30	105.00
February 6, 2024	BCL	Call with P. Humbert regarding potential resolution, and send email summarizing discussion.	0.70	245.00
February 7, 2024	BCL	Emails with ICC Associates regarding Commodore property, and update notes for same.	0.40	140.00
February 7, 2024	BCL	Review initial funding information relating to Stewart, and prepare notes for same.	0.50	175.00
February 7, 2024	BCL	Call with J. Alderman, D. Rosendorf, and R. Gutlohn regarding Stewart property.	0.50	175.00
February 7, 2024	BCL	Consider various issues relating to Commodore properties, and discussions with D. Rosendorf and D. Samole regarding same.	0.80	280.00
February 7, 2024	BCL	Consider sale of personal property in offices, and email Y. Castro regarding auctioneer.	0.30	105.00
February 7, 2024	BCL	Compile various emails from V. Bonet to discuss during meeting.	0.50	175.00
February 8, 2024	BCL	Review emails from J. Alderman regarding Los Pinos and Stewart, and call with D. Rosendorf regarding same.	0.40	140.00
February 8, 2024	BCL	Analyze hypothetical distribution for potential Stewart offer.	0.40	140.00

February 8, 2024	BCL	Draft motion to approve settlement and consent judgment for 299 Alhambra.	1.60	560.00
February 9, 2024	BCL	Draft motion to approve settlement for 299 Alhambra.	1.60	560.00
February 9, 2024	BCL	Draft proposed order and lender's affidavit for motion to approve settlement for 299 Alhambra.	0.80	280.00
February 9, 2024	BCL	Compile exhibits and emails with D. Rosendorf and Y. Castro regarding draft documents and exhibits for 299 Alhambra motion.	0.30	105.00
February 9, 2024	BCL	Meeting with V. Bonet and D. Rosendorf to discuss Commodore, Miami Beach and Valencia properties.	1.00	350.00
February 12, 2024	BCL	Review comments to proposed settlement motion for 299 Alhambra, and emails with D. Rosendorf and Y. Castro regarding same.	0.30	105.00
February 12, 2024	BCL	Emails with P. Humbert regarding payoff, settlement motion, proposed order, lender's affidavit, and other related documents.	0.20	70.00
February 13, 2024	BCL	Calls and emails with K. Rin regarding documents and analyses relating to lenders.	0.90	315.00
February 13, 2024	BCL	Conference call with third party regarding Miami Beach property.	0.50	175.00
February 13, 2024	BCL	Review closing statement for Minorca parcel, and emails with D. Rosendorf regarding same.	0.20	70.00
February 13, 2024	BCL	Review documents provided by R. Hyman, and update notes for same.	0.90	315.00
February 14, 2024	BCL	Review P. Humbert's redlines to motion to approve settlement, discuss with D. Rosendorf, and revise same, proposed order and affidavit, and emails with P. Humbert regarding same.	0.80	280.00
February 14, 2024	BCL	Consider closing documents relating to Minorca sale, and emails with D. Rosendorf and Y. Castro regarding same.	0.50	175.00

February 14, 2024	BCL	Consider issues relating to personal property in 299 Alhambra, and calls with Y. Castro to discuss M. Claire and auction.	0.60	210.00
February 14, 2024	BCL	Consider next steps for Miami Beach, update notes for same, and calls with D. Rosendorf regarding same.	0.80	280.00
February 14, 2024	BCL	Review documents located by R. Neary regarding Stewart property, consider next steps, and emails and call with D. Rosendorf regarding same.	0.80	280.00
February 14, 2024	BCL	Emails with prior broker for Stewart project regarding list price.	0.10	35.00
February 14, 2024	BCL	Calls and emails with Y. Castro regarding M. Claire and inventory for auction.	0.40	140.00
February 14, 2024	BCL	Emails with Y. Castro regarding UCC search.	0.20	70.00
February 14, 2024	BCL	Emails with investor and third party regarding Valencia and Miami Beach properties.	0.20	70.00
February 15, 2024	BCL	Consider issues relating to Miami Beach property, calls and emails with D. Rosendorf, interested party and J. Alderman regarding same.	0.70	245.00
February 15, 2024	BCL	Review and revise closing documents for Minorca parcel, and emails with S. Eslait, D. Rosendorf and Y. Castro regarding same.	0.50	175.00
February 16, 2024	BCL	Consider issues relating to consent judgments.	0.30	105.00
February 16, 2024	BCL	Review information relating to Montana property, and calls and emails with D. Rosendorf and Y. Castro regarding same.	1.00	350.00
February 16, 2024	BCL	Conference call with D. Rosendorf, K. Rin, and D. Zamorano to discuss properties, updates and next steps.	1.00	350.00
February 16, 2024	BCL	Emails with J. Alderman regarding funding information.	0.10	35.00
February 19, 2024	BCL	Calls and emails with K. Rin regarding funding documents from lenders, and emails with J. Alderman regarding same.	0.40	140.00

February 19, 2024	BCL	Review draft foreclosure judgment for 299 Alhambra, and emails with D. Rosendorf and P. Humbert regarding same.	0.40	140.00
February 19, 2024	BCL	Draft execution version closing documents for Minorca parcel, and email S. Eslait regarding same and closing.	0.40	140.00
February 19, 2024	BCL	Review UCC search results for receivership entities and related entities.	0.50	175.00
February 19, 2024	BCL	Revise motion to approve auction of personal property and proposed order for same, review service list issues, and update service list.	0.50	175.00
February 19, 2024	BCL	Calls and emails with M. Claire, Y. Castro, and R. Neary regarding inventory and auction of personal property.	0.50	175.00
February 19, 2024	BCL	Draft notice letter for certain investors for 299 Alhambra property settlement, and emails with Y. Castro regarding same.	0.20	70.00
February 19, 2024	BCL	Call with potential purchaser for Stewart, discussions with D. Rosendorf regarding same, and review notes regarding claims.	0.70	245.00
February 19, 2024	BCL	Emails with V. Bonet regarding Stewart property, and amounts owed to Winmar and subcontractors.	0.20	70.00
February 19, 2024	BCL	Revise settlement motion and proposed order, consider service issues, and emails with D. Rosendorf, P. Humbert and Y. Castro regarding same.	0.50	175.00
February 20, 2024	BCL	Consider recordings and other information relating to Stewart property, proposed sale and claims, and potential resolution analyses.	2.20	770.00
February 20, 2024	BCL	Discussions with D. Rosendorf regarding Stewart property, claims, settlement negotiations and other related issues.	1.00	350.00
February 20, 2024	BCL	Calls and emails with J. Alderman regarding Stewart and Miami Beach	1.00	350.00

		properties, and prepare for call regarding Stewart property.		
February 20, 2024	BCL	Call and emails with K. Rin and D. Rosendorf regarding transactions relating to Stewart property.	0.40	140.00
February 21, 2024	BCL	Call and emails with P. Humbert, and review and revise settlement motion, consent judgment and proposed order.	0.50	175.00
February 21, 2024	BCL	Call with R. Hyman, M. Raymond and D. Rosendorf regarding Stewart, Valencia and related issues, and discuss with D. Rosendorf regarding same.	0.60	210.00
February 22, 2024	BCL	Prepare redline of settlement motion, foreclosure judgment, and proposed order for 299 Alhambra, revise P. Humbert's redlines and emails regarding same.	0.60	210.00
February 22, 2024	BCL	Call and emails with K. Rin regarding funding and payment information relating to lenders, and issues relating to Sage.	0.40	140.00
February 22, 2024	BCL	Miami Beach site visit with D. Rosendorf, and meeting with J. Alderman and lender.	1.50	525.00
February 22, 2024	BCL	Prepare clean version of settlement motion, foreclosure judgment and proposed order for 299 Alhambra, and review and compile exhibits.	2.20	770.00
February 22, 2024	BCL	Email R. O'Brien regarding settlement motion and exhibits for 299 Alhambra.	0.10	35.00
February 23, 2024	BCL	Discuss Miami Beach and Stewart properties with D. Rosendorf, and contact potential real estate counsel.	0.20	70.00
February 23, 2024	BCL	Draft motion to approve sale and related relief for Stewart Grove property.	0.60	210.00
February 23, 2024	BCL	Review emails and information relating to Valencia property, and email AT&T contact regarding same.	0.20	70.00
February 24, 2024	BCL	Review emails from F. Schwartz regarding Los Pinos and listing	0.20	70.00

		agreement, and emails with D. Rosendorf regarding same.		
February 26, 2024	BCL	Review inventory from M. Claire and emails with Y. Castro regarding same.	0.10	35.00
February 26, 2024	BCL	Calls and discussions with D. Rosendorf to discuss yacht case, R. Kapoor's motion for clarification, and other matters.	1.00	350.00
February 26, 2024	BCL	Call with R. O'Brien regarding yacht, and other open issues.	0.50	175.00
February 26, 2024	BCL	Call and emails with counsel for bank for yacht.	0.50	175.00
February 26, 2024	BCL	Emails with R. O'Brien and F. Schwartz regarding motion to approve settlement for 299 Alhambra.	0.20	70.00
February 27, 2024	BCL	Attend to closing documents for Minorca sale, draft content for letter, and emails with D. Rosendorf, R. Penalver and S. Eslait regarding same.	0.70	245.00
February 27, 2024	BCL	Analyze lender information for Stewart property and accountant's schedule, and email D. Rosendorf regarding open items.	0.40	140.00
February 27, 2024	BCL	Consider next steps relating to Los Pinos, and discuss with D. Rosendorf regarding same.	0.70	245.00
February 27, 2024	BCL	Emails with F. Schwartz and P. Humbert regarding settlement motion for 299 Alhambra, and discuss same with D. Rosendorf.	0.50	175.00
February 27, 2024	BCL	Review inventory and proposal from M. Claire, draft and revise motion and proposed order for auction sale of personal property, and emails with M. Claire regarding auction date.	1.00	350.00
February 27, 2024	BCL	Email R. O'Brien regarding motion and proposed order for auctioneer and sale of personal property.	0.10	35.00
February 27, 2024	BCL	Call with counsel for interested party for Stewart Grove property.	0.30	105.00

February 27, 2024	BCL	Revise motion to approve settlement with 299 Alhambra, and emails with Y. Castro regarding preparing exhibits and filing.	0.10	35.00
February 27, 2024	BCL	Draft motion to approve sale and related relief for Stewart property.	2.30	805.00
February 28, 2024	BCL	Review case docket and various court filings for foreclosure case filed against Stewart property.	0.70	245.00
February 28, 2024	BCL	Review invoices and letter from City of Miami, and email D. Rosendorf regarding same.	0.10	35.00
February 28, 2024	BCL	Review various loan documents for Stewart property, and draft motion for sale of Stewart to address same.	1.40	490.00
February 28, 2024	BCL	Review additional lien claimants, and draft motion for sale of Stewart property to address same.	0.80	280.00
February 29, 2024	BCL	Review and redline confidential agreement and related information for Miami Beach property, and email D. Rosendorf regarding same.	0.80	280.00
February 29, 2024	BCL	Call and emails with K. Rin regarding Los Pinos and Stewart properties.	0.30	105.00
February 29, 2024	BCL	Consider carveout and claims process for Stewart property, and draft Stewart sale motion to address same.	2.40	840.00
February 29, 2024	BCL	Review order setting briefing schedule for motion to approve settlement for 299 Alhambra, and emails in firm regarding same.	0.10	35.00
March 1, 2024	BCL	Emails with third parties regarding Miami Beach property.	0.10	35.00
March 1, 2024	BCL	Discussions with D. Rosendorf regarding Stewart property, and motion for sale and claims process.	0.60	210.00
March 1, 2024	BCL	Discussions with D. Samole and D. Rosendorf regarding Los Pinos, and stay motion for F. Schwartz.	0.80	280.00
March 1, 2024	BCL	Emails and call with J. DeCarlo and D. Rosendorf regarding issues relating to Montana property.	0.50	175.00

March 1, 2024	BCL	Meeting with V. Bonet and D. Rosendorf to discuss Valencia and other properties.	1.00	350.00
March 1, 2024	BCL	Call with J. Alderman and D. Rosendorf regarding Stewart property.	0.60	210.00
March 1, 2024	BCL	Discussions with D. Rosendorf regarding Commodore properties, and review motion from ground lessor.	0.70	245.00
March 1, 2024	BCL	Emails with C. Herskowitz and S. Eslait regarding closing on Minorca sale, and review emails and information for same.	0.30	105.00
March 2, 2024	BCL	Review recorded and other documents for four entities that own Commodore parcels, and prepare notes for same.	2.30	805.00
March 2, 2024	BCL	Review funding information relating to lenders for various parcels for the Commodore properties.	0.80	280.00
March 2, 2024	BCL	Conference all with D. Rosendorf to discuss Commodore properties and related issues.	0.50	175.00
March 4, 2024	BCL	Discuss Commodore with D. Rosendorf, and prepare for call with R. Hyman and M. Raymond.	0.40	140.00
March 4, 2024	BCL	Conference call with D. Rosendorf, R. Hyman and M. Raymond to discuss Commodore properties, and discuss same with D. Rosendorf.	0.80	280.00
March 4, 2024	BCL	Call with D. Rosendorf, I. Coutts and other parties regarding Commodore properties.	0.50	175.00
March 4, 2024	BCL	Call with R. O'Brien to discuss Los Pinos property and other matters.	0.30	105.00
March 4, 2024	BCL	Discuss Los Pinos and R. Kapoor's proposed motion for stay with D. Rosendorf, and review emails regarding same.	0.50	175.00
March 4, 2024	BCL	Call with L. Fisher and D. Rosendorf regarding certain properties.	0.80	280.00

March 4, 2024	BCL	Call and emails with third party for Valencia condo.	0.30	105.00
March 4, 2024	BCL	Calls and emails with K. Rin to discuss Commodore, Stewart, Valencia, QuickBooks and other open items, and review information for same.	1.40	490.00
March 5, 2024	BCL	Review response to R. Kapoor's motion for stay relating to Los Pinos, and discuss with D. Rosendorf.	0.20	70.00
March 5, 2024	BCL	Draft motion for Stewart property addressing proposed sale, lender settlement and claims process, and research case law for same.	3.40	1,190.00
March 5, 2024	BCL	Draft proposed order for motion for Stewart property addressing sale, lender settlement and claims process.	1.00	350.00
March 5, 2024	BCL	Call and emails with counsel for ground lease landlord for Commodore parcels and related issues, and discuss same with D. Rosendorf.	0.70	245.00
March 5, 2024	BCL	Research case law relating to stale appraisals, review reply for motion to approve settlement with lender for 299 Alhambra, and discuss with D. Rosendorf.	1.00	350.00
March 5, 2024	BCL	Call with P. Humbert and D. Rosendorf regarding R. Kapoor's response to settlement motion for 299 Alhambra.	0.20	70.00
March 5, 2024	BCL	Emails with F. Schwartz regarding motion for sale of 299 Alhambra personal property, and R. Kapoor's claims to property.	0.20	70.00
March 6, 2024	BCL	Call with J. Alderman to discuss Los Pinos and Stewart properties, and discuss same with D. Rosendorf.	0.60	210.00
March 6, 2024	BCL	Call with counsel for potential purchaser for the Stewart property, and review emails and draft addendum for same.	0.50	175.00
March 6, 2024	BCL	Review auctioneer's inventory and revise motion and proposed order	2.60	910.00

		for sale of property in 299 Alhambra to address items raised by F. Schwartz, and calls and emails with F. Schwartz, D. Rosendorf, Y. Castro and R. O'Brien regarding same.		
March 6, 2024	BCL	Email M. Raymond and R. Hyman regarding landlord's draft motion to intervene.	0.10	35.00
March 7, 2024	BCL	Emails with Y. Castro regarding filing motion and proposed order for auctioneer and sale of property.	0.30	105.00
March 7, 2024	BCL	Call with third party regarding Valencia unit, and update notes for same.	0.30	105.00
March 7, 2024	BCL	Review F. Schwartz's proposed changes to motion to sell property for 299 Alhambra, review and revise said motion and related order, and emails with M. Schwartz and R. O'Brien regarding same.	0.70	245.00
March 7, 2024	BCL	Call and emails with private equity group regarding various properties.	0.40	140.00
March 7, 2024	BCL	Emails with P. Humbert regarding reply for 299 Alhambra settlement motion and motion for auctioneer and sale.	0.10	35.00
March 7, 2024	BCL	Call with third party regarding Commodore parcels.	0.30	105.00
March 7, 2024	BCL	Email M. Claire regarding revisions to address R. Kapoor's issues.	0.10	35.00
March 7, 2024	BCL	Review insurance status for properties, and update notes for same.	0.40	140.00
March 7, 2024	BCL	Emails with J. Alderman and S. Ferrera regarding proposed sale for Stewart property.	0.40	140.00
March 8, 2024	BCL	Call with J. Uribe regarding Stewart and Valencia properties, prepare for same, and update notes for same.	0.70	245.00
March 8, 2024	BCL	Calls and emails with R. O'Brien and J. Alderman regarding request to file response to R. Kapoor's stay motion.	0.70	245.00

March 8, 2024	BCL	Emails with J. Alderman and L. Fisher regarding Miami Beach property.	0.30	105.00
March 8, 2024	BCL	Review and revise motion to approve sale and related relief for Stewart property and service list, and review D. Rosendorf and Y. Castro's comments for same.	0.70	245.00
March 8, 2024	BCL	Call with G. Mars' office regarding discussions with City relating to Valencia.	0.10	35.00
March 8, 2024	BCL	Call and emails with S. Ferrera regarding proposed sale of Stewart property and related issues.	0.80	280.00
March 11, 2024	BCL	Meeting with D. Zamorano and K. Rin regarding certain transactions relating to Commodore properties.	0.50	175.00
March 12, 2024	BCL	Review sale contract and addendum for same for the Stewart property and prepare for call with S. Ferrera.	2.00	700.00
March 12, 2024	BCL	Call with S. Ferrera to discuss sale contract and addendum for the Stewart property.	1.80	630.00
March 12, 2024	BCL	Search and review corporate documents relating to Commodore properties.	0.50	175.00
March 13, 2024	BCL	Call with counsel for bank regarding yacht, and emails with F. Schwartz and J. Raskin regarding same.	0.40	140.00
March 13, 2024	BCL	Call with R. O'Brien regarding yacht and various additional open items.	0.80	280.00
March 13, 2024	BCL	Review revised sale contract and addendum for the Stewart property.	0.70	245.00
March 14, 2024	BCL	Consider updated addendum from S. Ferrera for the Stewart Property, revise and provide comments for same, and emails and call with S. Ferrera regarding same.	2.70	945.00
March 14, 2024	BCL	Emails with lender regarding floating water bill for Stewart.	0.10	35.00
March 14, 2024	BCL	Review Verizon lease and related information for Commodore parcel, and emails with Verizon regarding same.	0.50	175.00

March 15, 2024	BCL	Calls and emails with N. Zeher, M. Karcher and R. O'Brien regarding yacht and potential resolution.	1.00	350.00
March 15, 2024	BCL	Emails with City Attorney and L. Fisher regarding approvals for Miami Beach property.	0.20	70.00
March 18, 2024	BCL	Review J. Alderman's proposed changes to addendum for the Stewart property, and emails with D. Rosendorf and S. Ferrera regarding same.	0.50	175.00
March 18, 2024	BCL	Call with M. Solov, D. Dillworth and D. Rosendorf regarding certain Commodore parcels, and discuss same and Verizon lease with D. Rosendorf and D. Samole.	0.80	280.00
March 18, 2024	BCL	Review issues relating to yacht, and emails with N. Zeher, D. Rosendorf and R. O'Brien regarding same.	0.50	175.00
March 18, 2024	BCL	Call with R. Hyman, M. Raymond and D. Rosendorf regarding issues relating to Commodore properties, and discuss same with D. Rosendorf.	0.50	175.00
March 18, 2024	BCL	Review certain ground lease relating to Commodore parcel, and email D. Rosendorf regarding same.	0.60	210.00
March 19, 2024	BCL	Review D. Rosendorf's comments to addendum for Stewart sale contract, and emails with D. Rosendorf, J. Alderman and S. Ferrera regarding same and related issues.	0.40	140.00
March 19, 2024	BCL	Call with S. Ferrera to discuss addendum for Stewart sale contract, data room and non-disclosure agreement for Miami Beach and Montana properties.	0.40	140.00
March 19, 2024	BCL	Conference call with F. Saint-Remy, R. Neary, R. Rosendorf and R. O'Brien to discuss ESI production issues, and prior discussions with R. Neary regarding same.	0.80	280.00
March 19, 2024	BCL	Emails with M. Claire regarding alternative dates for auction of	0.10	35.00

Date	Category	Description	Hours	Amount
		personal property from 299 Alhambra.		
March 19, 2024	BCL	Emails with L. Fisher and S. Rothstein regarding Miami Beach properties and status of approvals.	0.20	70.00
March 20, 2024	BCL	Emails with K. Rin regarding certain transactions relating to Commodore properties, and discuss same with D. Rosendorf.	0.30	105.00
March 20, 2024	BCL	Emails with J. Alderman, J. Feigeles, and N. Linden regarding mediation and other issues relating to Los Pinos.	0.40	140.00
March 21, 2024	BCL	Prepare for meeting with K. Rin and D. Zamorano, review various issues relating to Stewart and Commodore properties, and escrow deposits for projects,	0.80	280.00
March 21, 2024	BCL	Conference call with J. Post, M. Solov, D. Dillworth and D. Rosendorf regarding Commodore ground leases, and discussions with D. Rosendorf regarding same.	1.00	350.00
March 21, 2024	BCL	Review and compile documents for Commodore properties, and emails with W. Duke regarding same and site visit.	0.80	280.00
March 21, 2024	BCL	Calls and emails with R. Neary regarding searching for additional documents for Commodore properties for W. Duke.	0.40	140.00
March 21, 2024	BCL	Emails with V. Bonet regarding construction costs for Commodore properties.	0.10	35.00
March 22, 2024	BCL	Review order approving auction of personal property, and emails with M. Claire, Y. Castro and R. Penalver regarding same and service.	0.20	70.00
March 22, 2024	BCL	Call with D. Rosendorf and third party regarding Miami Beach property, and prepare for same.	0.60	210.00
March 22, 2024	BCL	Call with third party regarding certain Commodore properties, and prepare for same.	0.40	140.00

March 22, 2024	BCL	Call with R. Neary regarding searching for documents relating to Commodore properties.	0.20	70.00
March 22, 2024	BCL	Review certain recordings relating to certain Commodore parcels, and email D. Rosendorf regarding same.	0.60	210.00
March 22, 2024	BCL	Calls with A. Almazan and J. Alderman regarding Stewart property addendum and buyer's broker, and discuss same with D. Rosendorf.	0.70	245.00
March 22, 2024	BCL	Calls and emails with S. Ferrera regarding Stewart and Miami Beach properties.	0.40	140.00
March 22, 2024	BCL	Meeting with K. Rin. D. Zamorano, and D. Rosendorf regarding transactions relating to Commodore, Stewart, Valencia and Miami Beach properties.	1.50	525.00
March 22, 2024	BCL	Call with J. DeCarlo regarding sale process and Montana property, and emails with S. Ferrera regarding same.	0.50	175.00
March 25, 2024	BCL	Call with D. Rosendorf to discuss issues relating to Commodore, Stewart and Valencia properties, and next steps.	0.30	105.00
March 25, 2024	BCL	Emails with W. Duke and R. Neary regarding additional information for Commodore properties.	0.20	70.00
March 25, 2024	BCL	Calls with D. Rosendorf to discuss Los Pinos and bankruptcy filing, and consider initial issues.	0.30	105.00
March 25, 2024	BCL	Emails with V. Bonet and Y. Castro regarding notice of sale of personal property.	0.10	35.00
March 26, 2024	BCL	Call with D. Rosendorf to discuss Los Pinos bankruptcy and Stewart sale contract.	0.40	140.00
March 26, 2024	BCL	Call with Y. Castro to discuss auction of personal property in 299 Alhambra offices, and preparing for same.	0.20	70.00
March 26, 2024	BCL	Review documents from R. Neary relating to Commodore parcels, call with D. Rosendorf to discuss same,	0.40	140.00

		and circulate with W. Duke.		
March 26, 2024	BCL	Review case law relating to bankruptcy filing by Los Pinos, and email D. Rosendorf regarding same.	0.20	70.00
March 26, 2024	BCL	Conference call with R. O'Brien and D. Rosendorf to discuss Los Pinos bankruptcy, Commodore properties, and discovery items.	1.00	350.00
March 26, 2024	BCL	Conference call with J. Alderman and D. Rosendorf to discuss Los Pinos bankruptcy and Stewart property.	0.50	175.00
March 26, 2024	BCL	Review NDA for Miami Beach data room, and email S. Ferrera regarding same.	0.20	70.00
March 26, 2024	BCL	Review certain documents for Commodore properties, and email D. Rosendorf regarding same.	0.30	105.00
March 26, 2024	BCL	Emails and call with S. Ferrera regarding Montana property, listing agreement, and related issues.	0.30	105.00
March 26, 2024	BCL	Review summaries relating to Stewart property, and email K. Rin regarding same.	0.20	70.00
March 26, 2024	BCL	Draft and revise motion to approve sale and related relief, and proposed order for the Stewart property.	1.20	420.00
March 26, 2024	BCL	Review indebtedness figures for Stewart property provided by J. Alderman.	0.20	70.00
March 26, 2024	BCL	Prepare parcel information for Commodore site visit.	0.20	70.00
March 27, 2024	BCL	Call with D. Rosendorf to discuss motion to approve sale and figures provided by lender for Stewart property.	0.40	140.00
March 27, 2024	BCL	Commodore site visit with D. Rosendorf and W. Duke.	1.00	350.00
March 27, 2024	BCL	Meeting with I. Coutts regarding tenant items and interest in certain parcels.	0.50	175.00
March 27, 2024	BCL	Revise motion to approve sale and related relief for Stewart property.	0.20	70.00

March 27, 2024	BCL	Emails with J. Alderman and N. Yida regarding sale contract and motion for the Stewart property.	0.20	70.00
March 27, 2024	BCL	Meeting with K. Rin, D. Zamorano and D. Rosendorf to discuss certain transactions and/or purchaser deposits for Stewart, Miami Beach and Valencia.	1.70	595.00
March 27, 2024	BCL	Emails with Verizon regarding owner of Commodore parcel.	0.10	35.00
March 27, 2024	BCL	Discussions with D. Rosendorf regarding L. Fisher proposal and related issues.	0.20	70.00
March 27, 2024	BCL	Emails with C. Gobel, R. O'Brien and F. Schwartz regarding motion to employ appraiser for Valencia property.	0.20	70.00
March 27, 2024	BCL	Emails with City of Miami regarding notices for certain Commodore parcels.	0.20	70.00
March 28, 2024	BCL	Consider proposed changes to sale agreement for Stewart property, and call with S. Ferrera and D. Rosendorf to discuss.	0.70	245.00
March 28, 2024	BCL	Call with third party regarding Valencia unit.	0.10	35.00
March 28, 2024	BCL	Emails with management company for Valencia regarding access to units.	0.10	35.00
March 28, 2024	BCL	Calls and emails with Y. Castro, P. Humbert and M. Claire regarding auction items for ground floor in 299 Alhambra.	0.30	105.00
March 28, 2024	BCL	Call with third party regarding Commodore properties.	0.20	70.00
March 29, 2024	BCL	Calls with D. Rosendorf regarding Los Pinos bankruptcy, Miami Beach deposits, Commodore lease, and R. Kapoor's motion to advance fees.	0.50	175.00
March 29, 2024	BCL	Emails with Y. Castro regarding list of additional claimed items by R. Kapoor.	0.20	70.00
March 29, 2024	BCL	Calls and emails with J. Maduro and D. Rosendorf regarding 299 Alhambra.	0.40	140.00

March 29, 2024	BCL	Review auction sale proposal for Miami Beach.	0.50	175.00

Total for ASSET DISPOSITION			178.40	62,440.00

CASE ADMINISTRATION

January 12, 2024	BCL	Call and emails with R. O'Brien regarding matter.	0.30	105.00
January 12, 2024	BCL	Meeting with D. Rosendorf and A. Fine to discuss receivership entities.	1.80	630.00
January 12, 2024	BCL	Review receivership order, consider initial steps, and begin preparing list of entities and notice parties.	1.50	525.00
January 12, 2024	BCL	Obtain IRS EIN number, and call and emails with bank regarding receivership account.	0.40	140.00
January 12, 2024	BCL	Emails with V. Bonet and R. Gonzalez regarding meeting and receivership order.	0.40	140.00
January 12, 2024	BCL	Calls with D. Rosendorf to discuss matter.	0.40	140.00
January 13, 2024	BCL	Calls and emails with D. Rosendorf regarding receivership entities and initial steps.	1.00	350.00
January 13, 2024	BCL	Review motion for asset freeze, exhibits and case docket, and prepare schedules relating to receivership entities, related entities and individuals, and potential assets.	2.80	980.00
January 13, 2024	BCL	Emails with counsel for lender, prior counsel for receivership entities, and R. Kapoor.	0.40	140.00
January 14, 2024	BCL	Prepare for meeting with V. Bonet.	1.70	595.00
January 14, 2024	BCL	Email R. Penalver regarding SEC letter.	0.10	35.00
January 14, 2024	BCL	Calls and emails with D. Rosendorf regarding certain entities, Steward properties, and meetings with R. Gonzalez, and V. Bonet.	1.20	420.00
January 14, 2024	BCL	Emails with L. Stein regarding Sunbiz project for entities for notice purposes.	0.20	70.00
January 14, 2024	BCL	Prepare for meeting with R. Gonzalez.	0.80	280.00

January 15, 2024	BCL	Calls with state court receiver over 299 Alhambra property, and prepare notes for same.	0.60	210.00
January 15, 2024	BCL	Conduct meeting with R. Gonzalez chief technology officer with M. Yip, and prepare for same.	1.20	420.00
January 15, 2024	BCL	Visit offices at 299 Alhambra with R. Gonzalez, M. Yip and D. Rosendorf.	1.20	420.00
January 15, 2024	BCL	Conduct meeting with V. Bonet manager for Urbin projects with D. Rosendorf and M. Yip, and prepare for same.	2.70	945.00
January 15, 2024	BCL	Review emails from counsel for various plaintiffs with cases against receivership and related entities, and discuss and emails with D. Rosendorf regarding same.	0.50	175.00
January 15, 2024	BCL	Consider document requests for B. Goodkind and A. Fine, and emails with D. Rosendorf regarding same.	0.40	140.00
January 15, 2024	BCL	Prepare for call with B. Goodkind, draft discussion items, and emails with D. Rosendorf regarding same.	1.70	595.00
January 15, 2024	BCL	Prepare discussion items for call with counsel for R. Kapoor, and emails with D. Rosendorf regarding same.	0.30	105.00
January 15, 2024	BCL	Update notes relating to receivership entities and properties based on additional information.	0.80	280.00
January 16, 2024	BCL	Conference call with D. Rosendorf, B. Goodkind and K. Florio regarding receivership entities, litigation and related issues, and prepare for same.	1.80	630.00
January 16, 2024	BCL	Emails with bankers regarding opening receivership account.	0.20	70.00
January 16, 2024	BCL	Emails with A. Fine regarding documents.	0.10	35.00
January 16, 2024	BCL	Emails with V. Bonet regarding documents relating to 299 Alhambra and Minorca property.	0.20	70.00
January 16, 2024	BCL	Call with J. Feigeles and F. Schwartz regarding R. Kapoor and	1.30	455.00

		related issues, and prepare for same.		
January 16, 2024	BCL	Discussions and emails with D. Rosendorf regarding various pending items, and next steps.	0.80	280.00
January 16, 2024	BCL	Conference call with R. O'Brien and D. Rosendorf, and prepare for same.	1.20	420.00
January 16, 2024	BCL	Review and revise motion to extend accounting deadline, and emails with D. Rosendorf and R. O'Brien regarding same.	0.40	140.00
January 16, 2024	BCL	Prepare for meeting with J. Chirinos	0.60	210.00
January 16, 2024	BCL	Consider parties to be noticed, review list from L. Stein, and prepare notes for same.	0.40	140.00
January 17, 2024	BCL	Review revised motion and proposed order to extend time for accounting, and emails with F. Schwartz and R. O'Brien regarding same.	0.20	70.00
January 17, 2024	BCL	Review and update task lists, and cast of characters.	1.00	350.00
January 17, 2024	BCL	Conference call with P. Batista and D. Rosendorf.	1.00	350.00
January 17, 2024	BCL	Discussions and calls with D. Rosendorf regarding priority items and next steps.	0.80	280.00
January 17, 2024	BCL	Emails with R. O'Brien regarding service of receivership order for banks and other parties.	0.20	70.00
January 17, 2024	BCL	Consider initial service list for receivership order, review internal COS, and emails and call with Y. Castro regarding same.	0.80	280.00
January 17, 2024	BCL	Review and revise general letter for receivership order.	0.50	175.00
January 17, 2024	BCL	Emails with bankers regarding receivership account.	0.20	70.00
January 17, 2024	BCL	Conduct meeting with J. Chirinos with D. Rosendorf, M. Yip and K. Rin, and prepare for same.	2.20	770.00
January 18, 2024	BCL	Emails with M. Yip regarding LV offices at 299 Alhambra, and update notes for same.	0.30	105.00

January 18, 2024	BCL	Emails with L. Stein and D. Rosendorf regarding certificate of interested parties.	0.20	70.00
January 18, 2024	BCL	Email R. Penalver regarding pulling pleadings for certain cases involving R. Kapoor.	0.10	35.00
January 18, 2024	BCL	Emails with tax accountant for entities, and update notes for same.	0.30	105.00
January 18, 2024	BCL	Consider and implement organization for various documents received from multiple parties for multiple projects, and discuss with D. Rosendorf.	0.80	280.00
January 19, 2024	BCL	Emails with L. Stein regarding preparing Sunbiz forms for receivership entities.	0.20	70.00
January 19, 2024	BCL	Assess status of various cases pending against receivership entities, and update spreadsheet for same.	1.40	490.00
January 19, 2024	BCL	Call and emails with D. Samole regarding hearing in foreclosure case against Stewart property.	0.50	175.00
January 19, 2024	BCL	Consider issues relating to Montana property and jurisdiction, research same, and emails and calls with Y. Castro regarding filing notice in Montana.	1.00	350.00
January 19, 2024	BCL	Discussions with L. Stein and R. Penalver regarding updating Sunbiz.	0.40	140.00
January 19, 2024	BCL	Scheduling conference with counsel for parties, and review draft report for same.	0.40	140.00
January 21, 2024	BCL	Review case dockets and status for various related cases, update notes for same, and email R. Penalver and D. Rosendorf regarding upcoming matters.	1.20	420.00
January 22, 2024	BCL	Meeting with R. O'Brien, F. Swartz, J. Raskin and D. Rosendorf to discuss joint scheduling, discovery and ESI issues, and review circulated documents to prepare for same.	1.20	420.00

January 22, 2024	BCL	Call and emails with G. Garcia and Y. Castro regarding data and related issues, update notes for same, and discuss with D. Rosendorf.	0.90	315.00
January 22, 2024	BCL	Consider status of various items and consider next steps, update notes for same, and discuss with D. Rosendorf.	0.70	245.00
January 22, 2024	BCL	Consider website, and email L. Garcia regarding same.	0.20	70.00
January 22, 2024	BCL	Review and revise certificate of interested parties and disclosure, and discuss with R. Penalver regarding same.	0.40	140.00
January 22, 2024	BCL	Review pending litigation chart, and discuss with D. Samole and R. Penalver regarding same.	0.30	105.00
January 22, 2024	BCL	Consider issues relating to Sage, and emails with L. Stein and D. Rosendorf regarding preparing letter.	0.30	105.00
January 22, 2024	BCL	Consider open items relating to R. Gonzalez, update notes, and emails with R. Gonzalez regarding same.	0.40	140.00
January 23, 2024	BCL	Consider open items relating to J. Chirinos, and email said individual regarding same.	0.30	105.00
January 23, 2024	BCL	Address issues relating to R. Kapoor's company email account, and emails with F. Schwartz regarding same.	0.40	140.00
January 23, 2024	BCL	Emails with K. Rin and R. Gonzalez regarding Sage login and related issues.	0.20	70.00
January 23, 2024	BCL	Prepare spreadsheet for receivership account.	0.30	105.00
January 23, 2024	BCL	Attend to documents for bank account and ICS feature, and emails with bankers regarding same.	0.30	105.00
January 24, 2024	BCL	Consider expenses relating to various programs and software, email R. Penalver regarding same, and update notes for same.	0.40	140.00

January 24, 2024	BCL	Review and revise draft motion and proposed order for extension of response deadline, and emails with R. O'Brien regarding same.	0.40	140.00
January 25, 2024	BCL	Conference call with M. Davis, M. Yip and R. O'Brien.	0.50	175.00
January 26, 2024	BCL	Call with counsel for 515 Valencia Condominium Association, update notes, and emails with V. Bonet regarding same.	0.60	210.00
January 26, 2024	BCL	Consider completed items and next steps, and update notes for same.	0.60	210.00
January 26, 2024	BCL	Emails with R. Penalver regarding QuickBooks invoices.	0.10	35.00
January 26, 2024	BCL	Call with [REDACTED] and D. Rosendorf.	1.00	350.00
January 26, 2024	BCL	Call with B. Barakat regarding Commodore parcels and related issues.	0.30	105.00
January 26, 2024	BCL	Calls and emails with M. Yip and D. Zamorano.	0.50	175.00
January 29, 2024	BCL	Call with Y. Castro regarding status of documents from two banks and R. Ward.	0.20	70.00
January 29, 2024	BCL	Emails with investors, R. Kapoor's counsel, association's counsel, and other interested parties regarding meetings and calls.	0.70	245.00
January 29, 2024	BCL	Attend to Teamwork software payment, discuss access with R. Gonzalez, and email R. Penalver regarding same.	0.30	105.00
January 29, 2024	BCL	Attend to internet bill and email with R. Penalver regarding same.	0.20	70.00
January 29, 2024	BCL	Calls with C. Herskowitz and Y. Castro regarding advances and expenses for matter.	0.40	140.00
January 29, 2024	BCL	Draft content and fields for investor webpage, and emails with L. Garcia and R. Penalver regarding same.	0.80	280.00
January 29, 2024	BCL	Call and emails with Commodore condo association regarding project and related issues.	0.70	245.00
January 30, 2024	BCL	Update notes for certain cases on pending litigation chart, and review	0.30	105.00

		email from J. Alderman regarding canceling status conference.		
January 30, 2024	BCL	Call with G. Mars regarding Valencia and association issues.	0.40	140.00
January 31, 2024	BCL	Call with F. Schantz and J. Raskin regarding various items, prepare for same, and prepare notes from call.	1.00	350.00
January 31, 2024	BCL	Research and consider issues relating to appeals and interlocutory appeals.	0.80	280.00
January 31, 2024	BCL	Emails with D. Samole and A. Gutman regarding status of 2/1/24 hearings for cases against receivership entities.	0.30	105.00
January 31, 2024	BCL	Review pending pre-receivership pending litigation chart, and emails with D. Samole regarding status of certain cases.	0.60	210.00
January 31, 2024	BCL	Review proposed motion and order to extend asset freeze, redline motion, and emails with R. O'Brien regarding same.	0.20	70.00
January 31, 2024	BCL	Call with R. O'Brien regarding discovery issues.	0.80	280.00
February 1, 2024	BCL	Consider investor website content, and emails with L. Garcia regarding same.	0.50	175.00
February 1, 2024	BCL	Call with K. Florio regarding issues relating to escrows, bond, and other matters, and review information to prepare for same.	1.20	420.00
February 1, 2024	BCL	Consider escrow and city bond issues, and review related documents.	1.10	385.00
February 2, 2024	BCL	Consider tax bill for Montana property, and email tax authority regarding same.	0.30	105.00
February 2, 2024	BCL	Review emails from and call with K. Florio regarding bonds and retainers.	0.40	140.00
February 2, 2024	BCL	Call with counsel for V. Bonet regarding indemnification.	0.10	35.00
February 2, 2024	BCL	Meeting with A. Fine to discuss tax items.	0.40	140.00

February 5, 2024	BCL	Email Chicago Title regarding Commodore property, and review notes for same.	0.20	70.00
February 5, 2024	BCL	Conference call with F. Schwartz, J. Raskin, D. Rosendorf and R. O'Brien regarding discovery, Los Pinos, and accounting.	0.90	315.00
February 5, 2024	BCL	Consider document production issues, and call and emails with Y. Castro and D. Rosendorf regarding same.	0.80	280.00
February 5, 2024	BCL	Emails with L. Garcia regarding update for investor website.	0.10	35.00
February 5, 2024	BCL	Emails with potential tenants regarding Commodore property.	0.30	105.00
February 5, 2024	BCL	Consider issues relating to pending cases, update chart, and emails with D. Rosendorf, D. Samole, Y. Castro and R. Penalver regarding same.	0.80	280.00
February 6, 2024	BCL	Review certain organizational charts provided by company's prior counsel.	0.20	70.00
February 6, 2024	BCL	Consider and review privilege issues.	0.40	140.00
February 6, 2024	BCL	Call and emails with tax accountants regarding QSF and other tax issues.	0.50	175.00
February 7, 2024	BCL	Review and complete forms, discuss with C. Herskowitz regarding same, and emails with Verizon regarding same.	0.20	70.00
February 7, 2024	BCL	Emails with R. Penalver regarding various emails from A. Fine regarding Sunbiz reports.	0.30	105.00
February 7, 2024	BCL	Discuss records and discovery items with R. Neary, and email R. Neary regarding matter.	0.30	105.00
February 7, 2024	BCL	Emails with C. Suarez regarding Valencia, and discuss same with D. Rosendorf.	0.20	70.00
February 7, 2024	BCL	Call with roof inspector for 299 Alhambra, and email and calls with P. Humbert regarding same.	0.80	280.00

February 7, 2024	BCL	Call and emails with Verizon regarding Commodore property, update notes for same, and discuss and emails with D. Rosendorf and C. Herskowitz.	1.20	420.00
February 8, 2024	BCL	Prepare private file with access information for various platforms, and emails with R. Neary regarding same.	0.70	245.00
February 8, 2024	BCL	Call with bond broker, and review letter from Chicago Title regarding bond.	0.30	105.00
February 8, 2024	BCL	Meeting and emails with R. Neary regarding various platforms and initial search items.	0.80	280.00
February 8, 2024	BCL	Video conference with R. O'Brien, T. Vargas and R. Neary regarding regarding discovery and other items, and calls with R. O'Brien regarding same.	0.80	280.00
February 9, 2024	BCL	Email and call tax appraiser's office in Montana.	0.10	35.00
February 9, 2024	BCL	Meeting with D. Flores and R. John to discuss Valencia and sale contract.	1.50	525.00
February 12, 2024	BCL	Emails and calls with R. O'Brien regarding certain records and properties.	0.60	210.00
February 12, 2024	BCL	Call with D. Rosendorf regarding scheduled calls for today relating to discovery, Commodore, Stewart, and Valencia properties, and prepare notes for same.	0.70	245.00
February 12, 2024	BCL	Emails with F. Schwartz regarding certain property in 299 Alhambra.	0.10	35.00
February 12, 2024	BCL	Emails with MSP4 regarding pending items and requests, and discuss with R. Neary.	0.30	105.00
February 12, 2024	BCL	Emails and calls with K. Rin and D. Zamorano regarding QuickBooks and Sage, and review information for same.	1.00	350.00
February 12, 2024	BCL	Call with D. Rosendorf, F. Swartz, J. Raskin and their forensic accountant regarding documents and files, and prepare for same.	0.70	245.00

February 12, 2024	BCL	Conference call and discussions with D. Samole, D. Rosendorf, R. Hyman and M. Raymond regarding Commodore, Valencia and Stewart properties.	1.00	350.00
February 12, 2024	BCL	Conference call with D. Rosendorf and G. Ceballos regarding open items for Valencia, and review documents relating to Valencia property and City.	0.50	175.00
February 12, 2024	BCL	Review various tax documents, and email H. Wynick regarding same.	0.40	140.00
February 12, 2024	BCL	Emails with legal assistant and K. Rin regarding payment for QuickBooks accounts.	0.20	70.00
February 12, 2024	BCL	Emails with R. Gonzalez regarding claim and QuickBooks accounts.	0.10	35.00
February 12, 2024	BCL	Email F. Schwartz regarding general ledgers.	0.10	35.00
February 12, 2024	BCL	Emails and calls with D. Rosendorf and other parties regarding FPL and water bills.	0.50	175.00
February 12, 2024	BCL	Review documents from R. Hyman relating to 299 Alhambra and Commodore, and prepare notes for same.	1.20	420.00
February 13, 2024	BCL	Attend to Cloudways account, and emails with MSP4 regarding same.	0.30	105.00
February 13, 2024	BCL	Calls with D. Rosendorf to discuss pending items, next steps and Google Workspace.	0.80	280.00
February 13, 2024	BCL	Calls and emails with R. O'Brien regarding QuickBooks, Sage and other items.	0.40	140.00
February 13, 2024	BCL	Emails with D. Rosendorf and Y. Castro regarding reviewing certain documents relating to unsealing.	0.20	70.00
February 13, 2024	BCL	Emails with F. Schwartz regarding excel ledgers for Sage.	0.10	35.00
February 13, 2024	BCL	Emails with counsel for parties regarding mediator and mediation.	0.10	35.00
February 13, 2024	BCL	Call with Y. Castro to discuss open items and next steps.	0.30	105.00
February 14, 2024	BCL	Review issues relating to printer, and email lessor regarding same.	0.20	70.00

February 14, 2024	BCL	Emails with R. Penalver and K. Rin regarding QuickBooks accounts.	0.10	35.00
February 14, 2024	BCL	Call with D. Rosendorf regarding counsel for contract party for Valencia.	0.10	35.00
February 14, 2024	BCL	Consider issues relating to Valencia properties, discuss with D. Rosendorf, and call with counsel for condo association regarding certain issues.	0.60	210.00
February 15, 2024	BCL	Emails with vendor regarding scan job for Goodkind documents.	0.10	35.00
February 15, 2024	BCL	Consider data summary and mapping and production issues, call and emails with R. Neary regarding same, and emails with MSP4.	1.40	490.00
February 15, 2024	BCL	Conference call and emails with [REDACTED] and [REDACTED] regarding books and records, and review related documents for same.	0.70	245.00
February 15, 2024	BCL	Review pending litigation summary, and emails with D. Rosendorf and J. Alderman regarding canceling hearings scheduled for next week.	0.50	175.00
February 15, 2024	BCL	Review certain Google workspace files for [REDACTED], and emails with R. Neary regarding same.	0.50	175.00
February 16, 2024	BCL	Call with J. Schneider and J. Kellogg regarding receivership and certain involved parties, and discuss same with D. Rosendorf.	0.20	70.00
February 16, 2024	BCL	Consider and draft initial disclosures, and email D. Rosendorf regarding same.	0.30	105.00
February 16, 2024	BCL	Call with Commodore condo association president.	0.20	70.00
February 16, 2024	BCL	Call with Y. Castro to discuss open items and next steps.	0.20	70.00
February 16, 2024	BCL	Call with D. Rosendorf to discuss certain pending cases.	0.10	35.00
February 19, 2024	BCL	Consider information relating to Montana property and tax bill, and email Y. Castro regarding same.	0.30	105.00
February 19, 2024	BCL	Review documents provided by V. Bonet regarding Valencia	0.40	140.00

		properties, and emails with V. Bonet and City regarding same.		
February 19, 2024	BCL	Calls and emails with K. Rin, F. Schwartz and R. Gonzalez regarding certain QuickBooks accounts.	0.50	175.00
February 19, 2024	BCL	Review letter from Chicago Title and other information regarding escrow deposits, and emails with D. Rosendorf and K. Rin regarding same.	0.60	210.00
February 19, 2024	BCL	Review information relating to printer lease, and email lessor representative regarding same.	0.20	70.00
February 19, 2024	BCL	Review information relating to insurance and water bill for Stewart, and update notes for same.	0.20	70.00
February 19, 2024	BCL	Emails with P. Humbert regarding access to Location Venture offices, and provide key for same.	0.20	70.00
February 19, 2024	BCL	Revise initial disclosures, and emails with D. Rosendorf regarding same.	0.20	70.00
February 20, 2024	BCL	Emails with D. Rosendorf and R. Penalver regarding initial disclosures.	0.10	35.00
February 20, 2024	BCL	Draft motion and proposed order to extend response deadline, and email R. O'Brien regarding same.	0.40	140.00
February 20, 2024	BCL	Meet banker to obtain checks, and emails with C. Herskowitz and Y. Castro regarding Montana tax bill.	0.30	105.00
February 20, 2024	BCL	Call and emails with vendor providing alarm system for certain space at 299 Alhambra.	0.30	105.00
February 21, 2024	BCL	Call with R. O'Brien regarding response to complaint, and email R. Penalver regarding motion and order for same.	0.20	70.00
February 21, 2024	BCL	Emails with Y. Castro and C. Herskowitz regarding Montana tax bill payment.	0.20	70.00
February 21, 2024	BCL	Call with alarm company for 299 Alhambra, and emails with R.	0.20	70.00

		Penalver regarding payment of invoice.		
February 21, 2024	BCL	Meeting at 299 Alhambra with team to recover certain hardware, review premises, and meet with M. Claire.	1.80	630.00
February 22, 2024	BCL	Consider issues relating to documents to be provided by Goodkind and Florio, and emails with K. Florio, K. Ann, and scan and sort vendor regarding same.	0.30	105.00
February 22, 2024	BCL	Emails with K. Rin regarding documents and information for customer deposits and escrow bond.	0.30	105.00
February 22, 2024	BCL	Address login issue for certain email account, and consider certain emails.	0.30	105.00
February 22, 2024	BCL	Emails with bankers regarding waiver of wire fees.	0.10	35.00
February 22, 2024	BCL	Emails with Chicago Title regarding documents relating to escrow deposits, and review related information.	0.20	70.00
February 22, 2024	BCL	Access FPL bill for Miami Beach property, and emails with lender regarding same.	0.20	70.00
February 23, 2024	BCL	Consider tax return documents and related issues, and emails with R. Neary and Y. Castro regarding same.	0.90	315.00
February 23, 2024	BCL	Consider customer deposit and bond documents and information for Commodore and Miami Beach properties, and emails with Y. Castro regarding same.	1.40	490.00
February 23, 2024	BCL	Call and emails with City counsel, engineer and public works director regarding items for Valencia property.	0.70	245.00
February 23, 2024	BCL	Emails V. Bonet regarding Valencia property and AT&T.	0.10	35.00
February 23, 2024	BCL	Calls and emails with multiple vendors regarding invoices and receiver website.	0.50	175.00

February 23, 2024	BCL	Review shared drives files inventory, call and emails with Y. Castro and other parties regarding same.	0.50	175.00
February 24, 2024	BCL	Consider applications for production, and email R. Neary regarding same.	0.40	140.00
February 26, 2024	BCL	Emails with C. Schmitt regarding documents for certain transactions.	0.50	175.00
February 27, 2024	BCL	Call with investor regarding Valencia and other issues.	0.30	105.00
February 27, 2024	BCL	Consider investor website, and emails with R. Penalver and L. Garcia regarding additional court documents for same.	0.30	105.00
February 27, 2024	BCL	Emails with printer lease company regarding printer.	0.10	35.00
February 27, 2024	BCL	Discussions with R. Neary regarding NAS, ESI and production issues, and review emails concerning same.	0.30	105.00
February 28, 2024	BCL	Call and emails with [REDACTED] regarding receivership companies, investors and related issues.	0.60	210.00
February 28, 2024	BCL	Call Y. Castro to discuss printers and leases.	0.10	35.00
February 28, 2024	BCL	Review information relating to Essenys, and email R. Neary regarding same.	0.20	70.00
February 28, 2024	BCL	Review receivership account statement, and email C. Herskowitz regarding same and ICS account access.	0.20	70.00
February 28, 2024	BCL	Review 1099s and email accountants regarding same.	0.10	35.00
February 28, 2024	BCL	Emails in firm and with various parties regarding customer lawsuits relating to Miami Beach property.	0.30	105.00
February 28, 2024	BCL	Calls and emails with K. Rin and D. Zamorano regarding Stewart property, Commodore condo association, Los Pinos and other items.	0.70	245.00

February 28, 2024	BCL	Emails with A. Gonzalez and V. Bonet regarding QuickBooks access for Commodore condo association.	0.20	70.00
February 28, 2024	BCL	Review notice for certain investors, and discuss same with Y. Castro.	0.20	70.00
February 29, 2024	BCL	Review invoices from Teamwork, and emails with R. Neary and R. Penalver regarding same.	0.20	70.00
February 29, 2024	BCL	Review service list and letter for investors, and emails with D. Rosendorf and Y. Castro regarding same.	0.40	140.00
February 29, 2024	BCL	Conference call with R. O'Brien, R. Neary and F. Saint-Remy to discuss ESI issues.	1.00	350.00
February 29, 2024	BCL	Review email from E. Rangel regarding documents retrieved from Goodkind, and email K. Florio regarding providing bank records.	0.10	35.00
March 1, 2024	BCL	Calls and emails with K. Rin regarding QuickBooks, and Stewart and Commodore properties.	0.70	245.00
March 1, 2024	BCL	Address documents and access items from F. Schwartz, emails with F. Schwartz regarding same, calls and emails with R. Neary and D. Rosendorf to discuss.	0.60	210.00
March 4, 2024	BCL	Call with R. Gonzalez and R. Neary regarding Google Workspace issues.	0.30	105.00
March 4, 2024	BCL	Review information regarding deposits for Commodore properties and Chicago Title, update notes for same, and emails with D. O'Quinn, D. Rosendorf and K. Rin regarding same.	1.00	350.00
March 4, 2024	BCL	Emails with R. Neary regarding bank account and statement search.	0.10	35.00
March 5, 2024	BCL	Review litigation status chart notes, and emails with R. Penalver and D. Rosendorf regarding same.	0.20	70.00
March 5, 2024	BCL	Emails with D. Rosendorf regarding demand letter and new lawsuit filed by Woodforest.	0.20	70.00

March 5, 2024	BCL	Email AT&T regarding Valencia work.	0.10	35.00
March 5, 2024	BCL	Email K. Rin regarding Sage quote and related issues.	0.10	35.00
March 5, 2024	BCL	Review FPL bill for Commodore unit, and email I. Coutts regarding same.	0.10	35.00
March 5, 2024	BCL	Discussions and emails with R. Neary regarding insurance relating to Commodore.	0.20	70.00
March 5, 2024	BCL	Review and update FPL information for Miami Beach property.	0.20	70.00
March 7, 2024	BCL	Attend to insurance application for Commodore parcel, and calls and emails insurance broker, R. Neary and D. Rosendorf regarding same.	0.60	210.00
March 7, 2024	BCL	Consider open items and next steps, update notes for same, and call with D. Rosendorf to discuss open items.	0.50	175.00
March 7, 2024	BCL	Email L. Garcia regarding website updates.	0.10	35.00
March 7, 2024	BCL	Emails with C. Herskowitz regarding deposits for receivership account.	0.10	35.00
March 7, 2024	BCL	Review lease with Commodore and emails with I. Coutts regarding same.	0.20	70.00
March 7, 2024	BCL	Review additional documents from Chicago Title, and emails regarding same.	0.30	105.00
March 8, 2024	BCL	Emails with counsel for buyers, J. Alderman, and Y. Castro regarding title commitment obtained by buyers for Stewart property.	0.30	105.00
March 8, 2024	BCL	Emails with C. Herskowitz and R. Neary regarding payment and insurance for Commodore parcel.	0.20	70.00
March 8, 2024	BCL	Access and transmit scanned Goodkind Florio documents, and emails with D. Zamorano regarding same.	0.80	280.00
March 11, 2024	BCL	Review email from K. Florio regarding status of hearing in Rene's Equipment's case.	0.10	35.00

March 11, 2024	BCL	Call with T. Coultis regarding lease and FPL payments.	0.10	35.00
March 11, 2024	BCL	Consider issues relating to certain attorneys and documents, and privilege issues, and research case law for same.	1.20	420.00
March 11, 2024	BCL	Call and email with Miami Dade Sewer Dept regarding Stewart and meter, and emails with J. Alderman regarding same.	0.40	140.00
March 12, 2024	BCL	Organize and review physical files and personal property in storage room.	1.40	490.00
March 13, 2024	BCL	Meeting with K. Rin and D. Zamorano to discuss purchaser escrows and other pending items.	0.90	315.00
March 13, 2024	BCL	Consider ESI options, review notes regarding Google Workspace, and call with R. Neary to discuss same.	0.30	105.00
March 13, 2024	BCL	Emails with T. Lopez regarding floating meter and invoices for the Stewart property.	0.20	70.00
March 13, 2024	BCL	Emails with City regarding copy of TCO extension for Valencia.	0.10	35.00
March 13, 2024	BCL	Consider document request, call with D. Rosendorf to discuss same, and emails with issuer.	0.40	140.00
March 13, 2024	BCL	Consider status of upcoming matters on pending litigation chart, and email R. Penalver regarding updating same.	0.20	70.00
March 14, 2024	BCL	Attend SEC's deposition of R. Kapoor.	3.50	1,225.00
March 14, 2024	BCL	Emails with counsel for Paramount Finishes regarding motion to transfer and stay.	0.20	70.00
March 15, 2024	BCL	Consider issues relating to ESI production, and call with R. Neary regarding same.	0.40	140.00
March 15, 2024	BCL	Review bank statement and email C. Herskowitz regarding same.	0.10	35.00
March 15, 2024	BCL	Attend to invoice for alarm system for 299 Alhambra space, and emails with R. Penalver and vendor.	0.10	35.00
March 15, 2024	BCL	Call with B. Widlanski and	0.40	140.00

		[REDACTED], and review letter for same.		
March 15, 2024	BCL	Review receivership entities' records [REDACTED], and calls with K. Rin to discuss same.	1.40	490.00
March 18, 2024	BCL	Attend to shared drives issues, create user, and consider updates and access, and discussions with R. Neary to address discovery issues.	2.20	770.00
March 18, 2024	BCL	Call with D. Rosendorf to discuss updates and next steps for various properties and open items.	0.60	210.00
March 18, 2024	BCL	Call with G. Mars to discuss Valencia items and TCO extension.	0.40	140.00
March 18, 2024	BCL	Email with vendor regarding unpaid invoices and receivership website.	0.10	35.00
March 18, 2024	BCL	Review tenant default notice from counsel for state court receiver for 299 Alhambra.	0.10	35.00
March 19, 2024	BCL	Call with O. Abella regarding 299 Alhambra.	0.20	70.00
March 19, 2024	BCL	Consider Stewart and Commodore properties, status conference, other open items and next steps, and calls with D. Rosendorf to discuss same.	0.80	280.00
March 19, 2024	BCL	Draft summary of real properties for status conference and initial report, review related documents, and email D. Rosendorf regarding same.	1.00	350.00
March 19, 2024	BCL	Call with H. Rivera regarding proposed engagement for Bahamas project.	0.20	70.00
March 19, 2024	BCL	Calls with M. Lopez regarding access to Commodore and Miami Beach properties.	0.20	70.00
March 19, 2024	BCL	Locate FPL bill and emails with I. Coutts regarding same and premises.	0.20	70.00
March 19, 2024	BCL	Review shared drives and users for Google Workspace and Y. Castro's list of shared files, prepare	1.60	560.00

Date	Category	Description	Hours	Amount
		summary, and emails with F. Schwartz and R. O'Brien regarding same.		
March 19, 2024	BCL	Meeting with J. Raskin, F. Schwartz, R. O'Brien, D. Rosendorf, R. Neary and F. Saint-Remy to discuss ESI production and related issues.	0.60	210.00
March 20, 2024	BCL	Emails with D. Kampert and K. Florio regarding escrow agent resignation.	0.30	105.00
March 20, 2024	BCL	Review pending motions, related pleadings and other documents to prepare for status conference on all pending motions, and prepare notes for same.	3.50	1,225.00
March 20, 2024	BCL	Review outline drafted by D. Rosendorf, and provide comments for same.	0.30	105.00
March 20, 2024	BCL	Review motion to direct receiver to advance fees, review case law and documents relating to same, and discuss with D. Rosendorf.	1.80	630.00
March 21, 2024	BCL	Emails with T. Lopez regarding floating water meter for Stewart property.	0.10	35.00
March 21, 2024	BCL	Attend status conference, and discussions with various parties prior to and after hearing.	1.50	525.00
March 21, 2024	BCL	Call with bank regarding check for subsidiary and endorsement.	0.10	35.00
March 21, 2024	BCL	Emails and call in firm regarding process servers' attempts to serve receivership and related entities.	0.40	140.00
March 22, 2024	BCL	Prepare summary of updates for receivership website, and email L. Garcia and R. Penalver regarding same.	0.40	140.00
March 25, 2024	BCL	Call and email with S. Ferrera regarding Commodore and Miami Beach surety and escrow agent resignation.	0.20	70.00
March 25, 2024	BCL	Meeting with S. Kerbel and G. Mkoouri regarding customer deposit, escrow agent and surety issues for Commodore and Miami	0.50	175.00

		Beach properties, and discuss with D. Rosendorf regarding same.		
March 25, 2024	BCL	Review website updates, and emails with L. Garcia regarding same.	0.20	70.00
March 26, 2024	BCL	Emails with bankers regarding check and money orders.	0.20	70.00
March 26, 2024	BCL	Call with [REDACTED], and calls with R. Neary and R. O'Brien regarding same.	0.40	140.00
March 26, 2024	BCL	Prepare summary [REDACTED], and email R. Neary regarding same.	0.40	140.00
March 26, 2024	BCL	Call with lien claimant regarding Bayshore Concept entity.	0.20	70.00
March 26, 2024	BCL	Emails with R. Neary regarding Teamwork and related payments.	0.10	35.00
March 27, 2024	BCL	Meeting with bankers to discuss deposits of certain checks and double endorsements.	0.50	175.00
March 27, 2024	BCL	Attend to obtaining registered agent for Montana entity, and emails with R. Penalver regarding same and completing annual report.	0.40	140.00
March 27, 2024	BCL	Email N. Alawamleh regarding payment and jacket.	0.10	35.00
March 27, 2024	BCL	Email V. Bonet regarding Commodore construction costs and key to office.	0.10	35.00
March 27, 2024	BCL	Email S. Kerbel regarding indemnitor agreements, bond and related issues.	0.10	35.00
March 27, 2024	BCL	Call S. Ferrera regarding issues relating to Miami Beach property, escrow agent resignation and related issues.	0.60	210.00
March 28, 2024	BCL	Emails with I. Coutts regarding locks relating to Commodore.	0.10	35.00
March 28, 2024	BCL	Calls with D. Kampert and S. Ferrera regarding deposit bond issues, and emails with S. Kerbel regarding same.	0.50	175.00
March 28, 2024	BCL	Emails with F. Saint-Remy and R. O'Brien regarding document	0.30	105.00

		production items.		
March 28, 2024	BCL	Attend to change of registered agent for Montana entity, review related documents, and emails with CT Corporation regarding same.	0.40	140.00
March 29, 2024	BCL	Conference call with R. Tome and D. Rosendorf regarding Miami Beach unit owners claims, deposits, and bond issues.	0.40	140.00
March 29, 2024	BCL	Consider issues relating to Goodkind Florio escrow agent resignation letter for Miami Beach and related issues, claims and bonds, and prepare notes and email to D. Rosendorf regarding next steps.	0.70	245.00
Total for CASE ADMINISTRATION			----- 150.40	52,640.00

CLAIMS ADMINISTRATION AND OBJECTIONS

January 19, 2024	BCL	Call with A. Nemetz regarding Valencia litigation and related issues.	0.50	175.00
January 22, 2024	BCL	Email with investors regarding meeting.	0.10	35.00
January 22, 2024	BCL	Review invoice from creditor, and update spreadsheet for same.	0.10	35.00
January 23, 2024	BCL	Call with J. Kaplan counsel for law firm relating to Valencia condo, and update notes for same.	0.40	140.00
January 26, 2024	BCL	Review draft agreed order prepared by Mironest plaintiffs, and emails with D. Rosendorf regarding same.	0.20	70.00
January 26, 2024	BCL	Emails with certain investors regarding meetings.	0.20	70.00
January 29, 2024	BCL	Call with counsel for plaintiff in certain cases amounts owed and state court case status.	0.20	70.00
January 31, 2024	BCL	Update information for investors and other parties, and search and review documents for same.	1.00	350.00
February 6, 2024	BCL	Call with M. Porges and M. Porges, and review proposed agenda and prior emails to prepare for same.	1.00	350.00
February 6, 2024	BCL	Review letter and complaint relating to Commodore property.	0.40	140.00
February 7, 2024	BCL	Review information regarding investors and spreadsheet, and email Y. Castro regarding same to prepare contact lists.	0.40	140.00
February 7, 2024	BCL	Call with vendor regarding amounts owed, Stewart property, and claimant website.	0.30	105.00
February 7, 2024	BCL	Respond to call and inquiries from S. Venizelos regarding receivership entities.	0.40	140.00
February 8, 2024	BCL	Conference call with certain investors for Miami Beach property and D. Rosendorf.	0.50	175.00
February 14, 2024	BCL	Review emails regarding vendor claims and Miami Beach foreclosure case, and emails with	0.40	140.00

D. Rosendorf and R. Penhalver
regarding same.

February 23, 2024	BCL	Review emails between city agencies regarding TCO extension for Valencia.	0.10	35.00
February 29, 2024	BCL	Emails with various lien claimants, creditors and other parties regarding various properties.	0.40	140.00
March 1, 2024	BCL	Email creditor regarding website and claims process.	0.10	35.00
March 6, 2024	BCL	Call with counsel for unit purchasers for Miami Beach property, and lien claimant for Commodore property.	0.40	140.00
March 6, 2024	BCL	Call with lien claimant regarding Stewart property.	0.50	175.00
March 14, 2024	BCL	Emails with waste company regarding invoices and receiver's website.	0.20	70.00
March 18, 2024	BCL	Emails with counsel for certain purchasers for Miami Beach units regarding demand letters, and email Y. Castro regarding same.	0.30	105.00
March 22, 2024	BCL	Call with creditor regarding status of case and claim.	0.20	70.00
March 25, 2024	BCL	Email creditor regarding website, and update service list for draft motion relating to Stewart.	0.10	35.00
March 26, 2024	BCL	Review demand letters and other correspondence regarding unit deposits for Miami Beach, and prepare spreadsheet for same.	0.30	105.00
Total for CLAIMS ADMINISTRATION AND OBJECTIONS			8.70	3,045.00

EMPLOYMENT APPLICATIONS (PROFESSIONALS)

January 14, 2024	BCL	Call and emails with M. Yip regarding matter, and related entities and parties.	1.20	420.00
January 16, 2024	BCL	Review and revise motion to employ attorney and proposed order, and email counsel for SEC and R. Kapoor regarding same.	0.70	245.00
January 17, 2024	BCL	Review and revise motion to employ M. Yip, review M. Yip's edits, and emails with M. Yip and R. Brien regarding same.	0.60	210.00
January 18, 2024	BCL	Emails and calls with R. O'Brien, D. Rosendorf and F. Swartz regarding motion to employ accountant.	0.50	175.00
January 30, 2024	BCL	Review proposed engagement letter, and emails with L. Duke regarding same.	0.40	140.00
February 14, 2024	BCL	Draft motion and proposed order to employ auctioneer, consider related issues, and emails with D. Rosendorf and Y. Castro regarding same.	1.50	525.00
February 16, 2024	BCL	Review M. Claire proposal, call with Y. Castro, and emails with M. Claire regarding same.	0.60	210.00
February 26, 2024	BCL	Call and email with proposed real estate counsel.	0.40	140.00
March 4, 2024	BCL	Emails with potential appraisers regarding the Commodore parcels.	0.10	35.00
March 6, 2024	BCL	Call and emails with W. Duke regarding Commodore properties.	0.50	175.00
March 6, 2024	BCL	Draft motion to employ real estate counsel and proposed order, and email D. Rosendorf regarding same.	0.80	280.00
March 6, 2024	BCL	Emails with proposed real estate counsel regarding billing requirements and related issues.	0.10	35.00
March 7, 2024	BCL	Emails with proposed real estate counsel, R. O'Brien and F. Schwartz regarding motion and proposed order to employ real estate counsel.	0.50	175.00

March 7, 2024	BCL	Call and email with C. Gobel regarding Commodore parcels and Valencia units.	0.60	210.00
March 7, 2024	BCL	Draft motion to employ broker for Montana property.	0.30	105.00
March 7, 2024	BCL	Emails with Y. Castro regarding filing motion to employ real estate counsel.	0.20	70.00
March 7, 2024	BCL	Emails with J. DeCarlo regarding Montana property and employment by estate.	0.20	70.00
March 8, 2024	BCL	Draft motion to employ broker for Montana property, and review documents relating to broker and Montana entities.	0.80	280.00
March 11, 2024	BCL	Call with W. Duke regarding Commodore parcels.	0.20	70.00
March 11, 2024	BCL	Call with J. DeCarlo regarding listing agreement commission and related issues for Montana property.	0.20	70.00
March 11, 2024	BCL	Draft and revise motion to employ broker for Montana property, broker's affidavit, and proposed order.	1.40	490.00
March 11, 2024	BCL	Draft motion to employ appraiser for Commodore properties.	1.00	350.00
March 12, 2024	BCL	Draft motion to employ broker for Montana property and related order and affidavit, and email J. DeCarlo regarding same.	0.50	175.00
March 12, 2024	BCL	Draft motion to employ appraiser for Commodore properties and related affidavit and proposed order, and email W. Duke regarding same.	1.00	350.00
March 15, 2024	BCL	Emails with J. DeCarlo regarding listing agreement for Montana property and quotes for certain work.	0.20	70.00
March 18, 2024	BCL	Revise motion, affidavit and order to employ auctioneer for Commodore, compile exhibits and related information for Commodore entities, and emails with W. Duke and R. O'Brien regarding same.	0.70	245.00

March 19, 2024	BCL	Emails with F. Schwartz and R. O'Brien regarding motion to employ appraiser for Commodore.	0.20	70.00
March 19, 2024	BCL	Emails with Y. Castro regarding motion to employ appraiser and exhibits, and review edits.	0.30	105.00
March 26, 2024	BCL	Draft motion to employ appraiser for Valencia units, and related affidavit and proposed order, and email C. Gobel regarding same.	1.40	490.00
March 28, 2024	BCL	Review proposal from L. Fisher for Miami Beach, call with L. Fisher to discuss, and discuss same with D. Rosendorf.	0.40	140.00
March 29, 2024	BCL	Draft motion to employ auctioneer, and related affidavit and proposed order, and email and call with D. Rosendorf to discuss same.	1.50	525.00
Total for EMPLOYMENT APPLICATIONS (PROFESSIONALS)			19.00	6,650.00

EXHIBIT B

KOZYAK TROPIN & THROCKMORTON'S
TIME ENTRIES

Summary of Professionals And Paraprofessional Time

Attorney Name		Licensed	Hours	Rate	Fee
BENJAMIN J. WIDLANSKI	Partner	2008	2.60	350.00	910.00
CLAYTON J. SCHMITT	Associate	2020	13.70	250.00	3,425.00
DAVID A. SAMOLE	Partner	2002	21.50	350.00	7,525.00
DAVID L. ROSENDORF	Partner	1994	244.70	350.00	85,645.00
FAROLA SAINT REMY	Paralegal	n/a	15.90	150.00	2,385.00
LEAH STEIN	Associate	2023	47.80	250.00	11,950.00
RAQUEL C. PENALVER	Paralegal	n/a	10.60	150.00	1,590.00
ROBERT NEARY	Of Counsel	2010	99.50	300.00	29,850.00
YAMILE C. CASTRO	Paralegal	n/a	110.80	150.00	16,620.00
Total Hours by Professionals and Paraprofessionals:					567.10
"Blended" Hourly Rate:					281.96
Total Professionals and Paraprofessionals Fees:					159,900.00

* Indicate any changes in hourly rates during this Application and the date of such change

** Indicate "blended" hourly rate.

Summary of Professional And Paraprofessional Time by Activity Code Category

Attorney Name	Licensed	Hours	Rate	Fee
BENJAMIN J. WIDLANSKI	2008	1.60	350.00	560.00
CLAYTON J. SCHMITT	2020	13.70	250.00	3,425.00
DAVID L. ROSENDORF	1994	7.70	350.00	2,695.00
FAROLA SAINT REMY	n/a	1.50	150.00	225.00
LEAH STEIN	2023	5.80	250.00	1,450.00
ROBERT NEARY	2010	7.30	300.00	2,190.00
YAMILE C. CASTRO	n/a	24.40	150.00	3,660.00
		-----	-----	-----
Total for Category ASSET ANALYSIS AND RECOVERY		62.00	229.11	14,205.00
-				
DAVID A. SAMOLE	2002	13.10	350.00	4,585.00
DAVID L. ROSENDORF	1994	139.20	350.00	48,720.00
FAROLA SAINT REMY	n/a	0.50	150.00	75.00
LEAH STEIN	2023	24.70	250.00	6,175.00
ROBERT NEARY	2010	19.30	300.00	5,790.00
YAMILE C. CASTRO	n/a	38.70	150.00	5,805.00
		-----	-----	-----
Total for Category ASSET DISPOSITION		235.50	302.12	71,150.00
-				
BENJAMIN J. WIDLANSKI	2008	1.00	350.00	350.00
DAVID A. SAMOLE	2002	8.40	350.00	2,940.00
DAVID L. ROSENDORF	1994	94.80	350.00	33,180.00
FAROLA SAINT REMY	n/a	13.90	150.00	2,085.00

LEAH STEIN	2023	17.30	250.00	4,325.00
RAQUEL C. PENALVER	n/a	10.60	150.00	1,590.00
ROBERT NEARY	2010	72.90	300.00	21,870.00
YAMILE C. CASTRO	n/a	42.40	150.00	6,360.00
Total for Category CASE ADMINISTRATION		261.30	278.22	72,700.00
-				
DAVID L. ROSENDORF	1994	2.20	350.00	770.00
Total for Category CLAIMS ADMINISTRATION AND OBJECTIONS		2.20	350.00	770.00
-				
DAVID L. ROSENDORF	1994	0.80	350.00	280.00
YAMILE C. CASTRO	n/a	5.30	150.00	795.00
Total for Category EMPLOYMENT APPLICATIONS (PROFESSIONALS)		6.10	176.23	1,075.00
-				
Grand Total		567.10	281.96	159,900.00

Summary of Requested Reimbursement of Expenses
for this Application Period Only
(1/1/2024 to 3/31/2024)

1.	Filing Fees (receivership action in Montana)	\$52.00
2.	Process Service Fees	\$300.00
3.	Witness Fees	\$0.00
4.	Court Reporter & Transcripts	\$0.00
5.	Lien and Title Searches.....	\$0.00
6.	Photocopies and digital images (includes court copies)	\$1,085.77
7.	Postage	\$102.54
8.	Overnight Delivery Charges	\$113.72
9.	Outside Couriers	\$55.00
10.	Long Distance Telephone Charges	\$0.00
11.	Travel Expenses (Parking & Mileage).....	\$79.70
12.	E-Discovery	\$0.00
13.	Filing Fees for 2024 Annual Reports for Receivership Entities	\$2,913.75
14.	Recording Fees by County Recorder for recording Receivership Order in various counties	\$727.00
15.	Miscellaneous:	\$3,944.15
	(a) Teamwork - \$62.97	
	(b) Tech Systems (alarm system at 299 Alhambra) - \$51.35	
	(c) Google Workspace (hosting) - \$547.71	
	(d) Digital Ocean (web hosting) - \$179.99	
	(e) Locksmith (replace and rekey locks to various office spaces at 299 Alhambra) - \$711.55	
	(f) AT&T Internet at 299 Alhambra - \$69.55	
	(g) Reactivation fees for Intuit Quickbooks - \$2,378.00	
	(h) Subscription fee for iDoc and Texas Secretary of State - \$6.00	

TOTAL EXPENSE REIMBURSEMENT REQUESTED \$9,373.63

For Professional Services Rendered

re: 5956-102

KTT AS COUNSEL ON SEC V. RISHI KAPOOR, ET AL.

ASSET ANALYSIS AND RECOVERY

January 14, 2024	DLR	Review pleadings and documents re 299 Alhambra litigation and draft notes to B. Lee re same (.8); review documents re 1505 Ponce property and draft notes to B. Lee re same (.5); review documents re 551 Bayshore and draft notes to B. Lee re same (.8); review additional materials re 551 Bayshore and follow up with additional notes re same (.7); review filings re Stewart Grove property and draft notes to B. Lee re same (.6)	3.40	1,190.00
January 18, 2024	DLR	Receive and review additional information from Goodkind Florio re 299 Alhambra property and claims against property (.3); receive and review information re Montana property and entities (.3); receive and review information and documents re Redlands (.2); receive and review information and documents re GIPA, 551 Bayshore, 1505 Ponce transactions (.4); confer with B. Lee re various assets and status of same (.3); receive and review information re Stewart Grove completion costs (.2); exchange messages with J. Alderman re property taxes due on properties (.2); review information re Kapoor yacht purchase (.3); prepare for and participate in meeting with counsel re yacht foreclosure proceedings and follow up with B. Lee re same (1.0); receive and review messages re URBIN Miami Beach property (.2); confer with B. Lee re receiver authority to reject contracts (.3)	3.70	1,295.00
January 19, 2024	LXS	Research contact information for Chase Bank in order to give them Receiver's wiring instructions (0.2). Speak with a Chase Bank	0.80	200.00

Date	Code	Description	Hours	Amount
		representative about Receiver's wiring instructions (0.6).		
January 19, 2024	LXS	Draft letter to Chase Bank on behalf of Receiver.	1.30	325.00
January 22, 2024	YCC	Review and process Quickbook records received for accountants (.1).	0.10	15.00
January 22, 2024	LXS	Research related entities and property search in Miami-Dade County.	0.30	75.00
January 22, 2024	YCC	Review and analyze contracts and perform real property search in Montana for Location Ventures Acquisitions, 7450 Partners LLC and 500 River Partners LLC; review and search sale status of real properties (.6).	0.60	90.00
January 23, 2024	YCC	Confer with B. Lee re: inspecting offices in Coral Gables, FL and changing locks (.1); review receiver's notes re: offices and coordinate with locksmith (.2); meet locksmith at Coral Gables office location to change locks and inspect/photograph offices (6 in total) (2.8).	3.10	465.00
January 24, 2024	YCC	Confer with B. Lee re: additional locks to replace at the Coral Gables office building; coordinate with locksmith (.1).	0.10	15.00
January 24, 2024	YCC	Review and attempt to obtain City National Bank documents; email with B. Lee re: same (.4).	0.40	60.00
January 24, 2024	YCC	Review and analyze Bank of America records (.2).	0.20	30.00
January 24, 2024	YCC	Review US Bank's response to receivership order and update status chart (.1).	0.10	15.00
January 25, 2024	YCC	Confer with B. Lee re: Montana real property owned by 7240 US Hwy 2 SPE LLC (.2); review real property details for this property and two other properties that were under contract with receivership entities (.2); perform litigation and real property searches for 7240 US Hwy	0.60	90.00

Date	Category	Description	Hours	Rate
		2 SPE LLC; review and analyze results (.2).		
January 25, 2024	YCC	Meet M. Lopez and locksmith at 275 Alhambra Circle to change locks and inspect/photograph workspaces; confer with M. Lopez re: premises and other properties (1.5); confer with B. Lee re: same and other real properties (.2).	1.70	255.00
January 27, 2024	YCC	Review, analyze and process City National Bank records for receivership entities (.2).	0.20	30.00
January 27, 2024	YCC	Review, analyze and process photos taken from inspection of Coral Gables office properties (.8).	0.80	120.00
January 29, 2024	YCC	Confer with B. Lee re: bank records and documents from SEC (.2); review and process bank records to Yip Associates (.2).	0.40	60.00
January 29, 2024	YCC	Telephone calls with Terrabank representative (2x) re: bank search on receivership defendants and provide additional information for same via email (.2); review correspondence from Wells Fargo and Citibank re: accounts search results (.1); update status chart (.1).	0.40	60.00
January 31, 2024	YCC	Meet with R. Gonzalez at Coral Gables property (.3).	0.30	45.00
January 31, 2024	YCC	Review and analyze photos taken at Coral Gables offices (.8).	0.80	120.00
February 3, 2024	YCC	Review and analyze correspondence from banks in response to freeze assets order; update status chart (.3).	0.30	45.00
February 5, 2024	YCC	Confer with B. Lee re: Google shared drive (.3); review and analyze Google shared drive files for inventory of same (1.0).	1.30	195.00
February 6, 2024	YCC	Telephone call to Chase Bank re: asset freeze order and extension requested; email to B. Lee re: same (.2); telephone call with Fifth Third Bank re: asset freeze order and left message; email to B. Lee re: same (.2).	0.40	60.00

February 6, 2024	YCC	Review and analyze documents provided by realtor for Montana property (.1).	0.10	15.00
February 6, 2024	LXS	Draft form letter regarding litigation hold and form document request for subpoenas.	3.40	850.00
February 9, 2024	DLR	Confer with B. Lee re Goodkind Florio documents for transactions (.2)	0.20	70.00
February 12, 2024	YCC	Review and analyze Intercredit Bank response letter to asset freeze order; update chart (.1).	0.10	15.00
February 13, 2024	YCC	Confer with B. Lee re: bank subpoenas, Coral Gables and Montana real properties (.3).	0.30	45.00
February 13, 2024	YCC	Review and analyze list of entities and note affiliates and non-receiver entities for preparation of subpoenas (.3).	0.30	45.00
February 14, 2024	YCC	Review and analyze Interamerican Bank response letter to asset freeze order; update chart (.1).	0.10	15.00
February 15, 2024	YCC	Prepare draft subpoena for bank records (.2); prepare attachment A to subpoena and declaration (1.1).	1.30	195.00
February 15, 2024	FSR	Interoffice discussion with Mr. Neary, strategy, and planning for transfer of server (.20); attention to, and coordinate statement of work to process and host data (.30); meet-and-confer with Clay Crandall of Virtuworks to discuss infrastructure to host server (.30); multiple emails with Mr. Neary re: same (.20)	1.00	150.00
February 16, 2024	BJW	Call with Ms. Lee, Mr. Rosendorf, and J. Schneider re: investor claims.	0.30	105.00
February 20, 2024	YCC	Review and prepare subpoenas for various banks (.4); review and revise subpoena attachments to each bank and verify account information (6 in total) (1.4).	1.80	270.00
February 21, 2024	YCC	Obtain registered agent for Woodforest National Bank (.2).	0.20	30.00

February 21, 2024	RN	Search of Location Ventures offices at 299 Alhambra Circle re: documents; computers; hard drives; etc.	5.30	1,590.00
February 23, 2024	YCC	Email with Flathead Couty taxing authority re: payment of taxes for Montana real property (.1).	0.10	15.00
February 23, 2024	YCC	Prepare subpoena for Woodforest Bank (.2); prepare notice of serving subpoenas with service list (.8).	1.00	150.00
February 26, 2024	YCC	Review and finalize subpoenas for bank records (.5) and coordinate with process server (.1); revise, finalize and serve notice of serving subpoenas upon counsel and interested parties (.7); review and analyze SEC's bank subpoena (.1).	1.40	210.00
February 26, 2024	CJS	Review and analyze documents relating to potential claims for recovery.	1.30	325.00
February 26, 2024	CJS	Research elements of fraudulent transfer cause of action under Florida Uniform Fraudulent Transfer Act.	1.20	300.00
February 26, 2024	FSR	Telephone conference with Robert Neary, Clay Crandal, and Guido Garcia, planning and discussion of strategy to forensically relocate server	0.50	75.00
February 26, 2024	BJW	Strategy discussion with Ms. Lee regarding investigation into potential third parties (.2); meeting with Ms. Lee regarding next steps in investigation and potential targets (.8)	1.00	350.00
February 27, 2024	CJS	Review and analyze entity and project documents relating to potential claims for recovery.	1.80	450.00
March 5, 2024	YCC	Meet with R. Neary and J. Alfonso at 299 Alhambra office building to review and analyze computers and hard drives (1.8); confer with B. Lee re: same (.1); confer with J. Alfonso re: servers (.2).	2.10	315.00
March 5, 2024	RN	Searching Location Venture offices in Coral Gables with Y. Castro and IT rep for computers/hard drives.	2.00	600.00

Date	Case	Description	Hours	Rate
March 5, 2024	YCC	Retrieving computers and confer with IT re: access to same. (1.9) Confer with Receiver re: results of search (.1).	0.10	15.00
March 6, 2024	CJS	Review and analyze deposition testimony of officers for potential third party recovery claims.	2.20	550.00
March 7, 2024	YCC	Review return of service of subpoena on Woodforest National Bank and email re: same (.1).	0.10	15.00
March 7, 2024	YCC	Perform real property search on Urbin Commodore Residential SPE LLC; review and analyze results and email with B. Lee re: same (.4).	0.40	60.00
March 8, 2024	YCC	Telephone call with Ronda from Chase Bank re: subpoena for records (.2); email with B. Lee re: same (.1),	0.30	45.00
March 12, 2024	CJS	Draft order of proof for potential third party recovery claims.	1.80	450.00
March 13, 2024	YCC	Review and analyze bank records from Goodkind and Florio (.2).	0.20	30.00
March 15, 2024	YCC	Review and analyze additional Goodkind Florio bank statements (.1).	0.10	15.00
March 18, 2024	YCC	Review, process and transmit Google Drive financials to accountants (.2).	0.20	30.00
March 20, 2024	CJS	Conduct research into backgrounds and roles of certain parties. Draft order of proof for potential claim.	1.90	475.00
March 21, 2024	CJS	Research legal standards for and elements of Florida unjust enrichment claim. Draft order of proof for potential third party recovery claims.	2.10	525.00
March 22, 2024	YCC	Prepare subpoena for records from American Express (.2); review and revise attachment to American Express subpoena (.6).	0.80	120.00

March 22, 2024	CJS	Review and revise first draft of order of proof for potential third party recovery claims.	0.70	175.00
March 22, 2024	BJW	Review and comment on draft order of proof from Mr. Schmitt	0.30	105.00
March 27, 2024	CJS	Review and analyze new Eleventh Circuit Court of Appeals precedent regarding receivership fraudulent transfer and tort claims.	0.70	175.00
March 28, 2024	YCC	Follow up on payment of City National Bank's invoice for bank records (.1); exchange communications with City National Bank re: payment and bank records (.2); attention to JPMorgan bank records (.1).	0.40	60.00
March 28, 2024	DLR	Exchange several messages with Y. Castro to coordinate receipt of documents from JPMorgan Chase and City National Bank (.4).	0.40	140.00
March 29, 2024	YCC	Confer with B. Lee re: bank records subpoenaed; review, analyze and process City National Bank records subpoenaed; transmit same to various parties (.6).	0.60	90.00
March 29, 2024	YCC	Confer with B. Lee re: bank records subpoenaed; review, analyze and process JPMorgan Chase Bank records subpoenaed; transmit same to various parties (.6).	0.60	90.00
Total for ASSET ANALYSIS AND RECOVERY			62.00	14,205.00

ASSET DISPOSITION

January 13, 2024	DLR	Exchange messages with J. Alderman re Stewart Grove and other properties and further follow up re same utilities and cost advance agreement (.4).	0.40	140.00
January 16, 2024	DLR	Receive and review information and documents from Goodkind firm re Minorca lots transaction and pending sale (.4)	0.40	140.00
January 17, 2024	DLR	Receive and review correspondence re asset freeze (.1); review and exchange several messages with J. Alderman re loans against various properties (.3); receive and review messages from V. Bonet with information on properties and possible sales (.3); exchange several messages with lender counsel and others re utility service at Stewart Grove (.3); receive and review information and documents re intercompany transactions (.4); further follow up with lender counsel re utility service (.2)	1.60	560.00
January 17, 2024	DLR	Receive and review additional information re sale of remaining Minorca lot (.3); confer with B. Lee re same (.2); Review correspondence and documents re Minorca lots purchase agreement and extension and reach out to buyer counsel re same (.3); exchange messages with B. Lee re same (.1); draft message to counsel for Minorca buyer and further exchange messages and follow up re same (.3); participate in call with Minorca lots buyer counsel and confer with B. Lee re same (.3);	1.50	525.00
January 18, 2024	DLR	Confer with B. Lee re Minorca lots and pending sale and further follow up re same (.4); receive and review message from buyer's counsel with title commitment and review same (.2); exchange messages with B.	1.40	490.00

Date	Attorney	Description	Hours	Amount
January 18, 2024	DAS	Lee re title commitment and requested buyer's representations (.3); receive and review additional information from buyer's counsel re prior sale (.3); exchange messages with B. Lee re Minorca property prior loans (.2)	0.40	140.00
January 18, 2024	DAS	Field call from group representative with interest in doing potential transaction on certain property located in Coconut Grove, and get preliminary background of same; advise receivership team (.4)	0.40	140.00
January 19, 2024	DLR	Receive and review message and documents from buyer's counsel for Minorca lot and further confer with B. Lee re same (.4)	0.40	140.00
January 19, 2024	DLR	Review materials in preparation for call with lender and receiver counsel re 299 Alhambra property (.4); participate in call with lender and receiver counsel re 299 Alhambra (.7); further confer with B. Lee re same (.3); prepare for and participate in call with Mironest counsel re 515 Valencia and follow up with B. Lee re same (1.0); review materials re Kapoor home and yacht (.3); further exchange messages with lender counsel re 299 Alhambra and confer with B. Lee re same (.3)	3.00	1,050.00
January 20, 2024	DLR	Receive and review email from J. Alderman re Stewart Ave. property (.1); Confer with B. Lee re Stewart and other properties (.4); review property records re 299 Alhambra and 515 Valencia to analyze liens and related issues (2.2)	2.70	945.00
January 21, 2024	LXS	Phone call with Receiver to discuss properties (Stewart, 299 Alhambra and Los Pinos) research assignment.	0.40	100.00
January 21, 2024	DLR	Confer and exchange messages with B. Lee re analysis of properties and liens, information from lenders (.3); receive and review L. Stein	0.60	210.00

Date	Code	Description	Hours	Amount
January 21, 2024	LXS	memo re Stewart Grove property analysis (.3)	4.80	1,200.00
January 21, 2024	DLR	Research Stewart 1, LLC and Stewart 2, LLC property records, collect and save recorded documents, prepare a summary of the documents, and prepare a spreadsheet containing the recorded information for Receiver.	0.30	105.00
January 22, 2024	LXS	Receive and preliminary review of draft motion to approve sale re Minorca lot (.3)	3.30	825.00
January 22, 2024	LXS	Research CG Office SPE, LLC property records for 299 Alhambra, collect and save recorded documents, prepare a summary of the documents, and prepare a spreadsheet containing the recorded information for the Receiver.	2.00	500.00
January 22, 2024	DLR	Research 7233 Los Pinos, LLC property records, collect and save recorded documents, prepare a summary of the documents, and prepare a spreadsheet containing the recorded information for Receiver.	0.70	245.00
January 22, 2024	DLR	Receive and review messages re waiver of appraisal requirement for sale (.2); revise motion to approve sale and confer with B. Lee re same (.3); receive and review B. Lee message and proposed order re Minorca sale (.2)	0.70	245.00
January 23, 2024	DLR	Receive and review messages re 299 Alhambra property and purchase offer (.2); review L. Stein message and update of review of 299 Alhambra property documents (.3); review update of information re Los Pinos property (.2)	2.80	980.00
January 23, 2024	DLR	Prepare for and participate in call with counsel for 299 Alhambra re potential disposition of property (.3); prepare for and participate in call with B. Goodkind re Coconut Grove property (.6); prepare for and participate in call with counsel re		

Date	Party	Description	Hours	Amount
		Kapoor yacht maritime foreclosure (1.0); exchange messages with counsel re 515 Valencia property and Mironest action and effect of stay (.3); confer with S. Eslait re Minorca sale and court order authorizing same (.1); receive and review 299 Alhambra receiver report (.2); confer with B. Lee re lender interests in properties and reach out to counsel re same (.3)		
January 23, 2024	DLR	Receive and review responses re stipulation to waive appraisal re Minorca (.2); receive and review further messages re same (.2)	0.40	140.00
January 23, 2024	YCC	Review and file stipulation waiving Rule 2001(a) along with submission proposed order (.5).	0.50	75.00
January 24, 2024	DLR	Receive and review redlines to Minorca sale documents (.3)	0.30	105.00
January 24, 2024	DLR	Receive and review additional documents and analysis re 299 Alhambra property (.3)	0.30	105.00
January 24, 2024	LXS	Correspond with Receiver regarding mortgages for 299 Alhambra properties. Send Receiver loan documents related to those properties.	0.60	150.00
January 25, 2024	LXS	Collect additional mortgage and loan documents for 299 Alhambra property.	0.70	175.00
January 25, 2024	DLR	Receive and review documents and L. Stein messages re mortgages on properties owned by receivership company affiliates (.3); draft message to B. Lee re financing of 299 Alhambra property (.2)	0.50	175.00
January 25, 2024	DLR	Receive and review B. Lee message and attached affidavit for Minorca buyer (.2)	0.20	70.00
January 29, 2024	YCC	Review and revise motion for authority to close on pending sale and approve sale (.8); review and revise proposed order (.2); review and revise non-foreign certification (.2); review and analyze warranty deed and buyer's affidavit; emails	2.90	435.00

Date	Attorney	Description	Hours	Amount
		re: potential edits (.2); assemble exhibits to sale motion and redact any personal identifying information (.8); confer with B. Lee re: same (.1); finalize and file sale motion and submission of proposed order (.6).		
January 29, 2024	DLR	Receive and review finalized motion to approve sale and waiver of appraisal and submission of proposed order (.2)	0.20	70.00
February 1, 2024	DLR	Receive and review messages from J. Alderman re Stewart Grove property (.2)	0.20	70.00
February 1, 2024	DLR	Receive and review messages from J. Alderman and F. Schwartz re Los Pinos property (.2)	0.20	70.00
February 2, 2024	DAS	Obtain factual and procedural background of pending disputes, items and issues on Receivership's commercial ground lease, matters with landlord and city, as well as with the lender on the ground lease, and Receiver needing assistance going forward with reviewing/analyzing ground lease and associated documents and developing streamlined plan to address distressed debt real estate situation (.6)	0.60	210.00
February 2, 2024	DLR	Exchange messages re 515 Valencia and stay order (.2)	0.20	70.00
February 3, 2024	DLR	Confer with B. Lee re meeting with J. Alderman and R. Gutlohn (.2); meeting with J. Alderman and R. Gutlohn and inspection of Stewart Ave. property (3.5); further meeting with B. Lee and site visit to Commodore property (1.0)	4.70	1,645.00
February 4, 2024	LXS	Research Urbin Commodore property records, collect and save recorded documents, prepare a summary of the documents, and prepare a spreadsheet containing the recorded information for Receiver.	3.50	875.00

February 4, 2024	DAS	Review pair of Commodore ground leases provided by counsel along with pair of separate ground lease memoranda (.4); review trio of additional emails providing more background on secured financing on the ground leases and review pending amended complaint with respect to same (.4); draft trio of responsive correspondence to Receivership team summarizing ground lease provision on raised issue; providing comments regarding pending litigation, and discuss timing and issues as to escrow funds surety matter (.4)	1.20	420.00
February 4, 2024	DLR	Receive and review messages from J. Alderman and A. Almazan re Stewart Grove property (.2); receive and review D. Samole messages re Commodore ground leases (.3); receive and review several more messages re Stewart Grove (.2)	0.70	245.00
February 5, 2024	LXS	Research Urbin Commodore property records, collect and save recorded documents, prepare a spreadsheet containing the recorded information for Receiver.	3.10	775.00
February 5, 2024	DLR	Confer with B. Lee and D. Samole re Commodore property (1.2); exchange messages with J. Alderman re Stewart Grove property (.3); receive and review further message from potential purchaser for Stuart Grove property (.2); receive and review estimates from Winmar re Stewart Grove property (.3); receive and review correspondence with R. Hyman re backup for loans (.2); receive and review message from Commodore tenant (.1); receive and review L. Stein message and attached chart re recorded liens against Commodore property (.2); receive and review information re lender payoff on Stewart (.1)	2.60	910.00
February 5, 2024	DLR	Confer with B. Lee re 299 Alhambra property disposition (.3)	0.30	105.00

February 5, 2024	DAS	Review updated pending litigation case chart; follow up as to hearing coverage items (.4); receive and begin to review Ms. Stein's chart of legal/property recordings on various receivership entities' property interests (.3); obtain status from Receiver and Mr. Rosendorf of discussions and issues raised on Commodore property relating to lender items and surety/escrow agent deadline this week and other lease issues, and discuss various strategy and legal analysis to be done and next steps (1.0); review more escrow/surety bond agreement documents as well as statutory law and some case law on scope and procedure for claims to be made (.8); review ground lease as to material alterations and maintenance of premises, and draft executive summary of provisions and options for Receiver (.6)	3.10	1,085.00
February 6, 2024	LXS	Research Urbin Miami Beach Owner, LLC property records, collect and save recorded documents, prepare spreadsheet containing the recorded information for Receiver.	4.10	1,025.00
February 6, 2024	DLR	Exchange messages and confer with B. Lee re Miami Beach property (.2); exchange messages and confer with B. Lee re 299 Alhambra property and proposed resolution re same (.3); receive and review D. Samole messages re bonds for customer deposits (.2)	0.70	245.00
February 7, 2024	DAS	Review series of correspondence exchange between escrow agent and surety bond regarding renewed through February 2025; review enclosures and advise Receiver regarding same (.2); participate in teleconference call with surety counsel for Washington and Commodore properties exchanging information, updated status and discussing additional document	1.60	560.00

		exchange needed (.5); call with tenant about reconciling lease payments, status of property and also discussing related items (.5); follow up with Receiver regarding maintenance issues at Commodore property (.4)		
February 7, 2024	DLR	Review messages and confer with B. Lee re Commodore property and Verizon lease (.3); further exchange messages and confer with B. Lee re status of various properties and negotiations re same (.3); receive and review emails and additional information re customer deposit bond (.3); receive and review correspondence between lender and Kapoor counsel re Los Pinos (.2); Confer with counsel for surety re bond for customer deposits, and further follow up re same (.4); Confer with tenant re status of lease and lease payments and potential purchase of Commodore (.4); receive and review messages re 299 Alhambra property and roof repairs (.2); exchange messages re Goodkind Florio documentation re LV transactions (.2); review analysis of funding to Stewart Grove property (.2); review analysis of liens on Miami Beach property (.2); confer with B. Lee, J. Alderman and lender re Stewart property (.5); further confer with B. Lee and D. Samole re Commodore property (.4); confer with B. Lee re Valencia property (.1)	3.70	1,295.00
February 7, 2024	LXS	Research Urbin Miami Beach Owner, LLC property records, collect and save recorded documents, and prepare spreadsheet containing the recorded information for Receiver.	0.40	100.00
February 8, 2024	YCC	Review and analyze appraisal for liquidation of personal property at Coral Gables office; cross-reference against photos and spreadsheet from buyer prior to receivership and update	1.10	165.00

Date	Code	Description	Hours	Amount
February 8, 2024	DLR	Review and exchange several messages with counsel and confer with B. Lee re Stewart Ave., Los Pinos (.4); draft message to parties re Receiver position regarding Los Pinos (.3); follow up with message to potential Stewart Ave. buyer re purchase proposal (.2); prepare for and participate in call with investors for Miami Beach property and confer with B. Lee re same (.5).	1.40	490.00
February 8, 2024	YCC	Conduct lien search on 7240 US Hwy 2 SPE, LLC in Flathead, Montana; email with B. Lee re: same (.2).	0.20	30.00
February 9, 2024	YCC	Review and cross-reference additional personal property from Coral Gables office and spreadsheet from buyer prior to receivership; update spreadsheet and email to B. Lee re: same (.7); telephone call to auctioneer and left message (.1).	0.80	120.00
February 9, 2024	DLR	Receive and review further communications between Stewart lender and potential buyer (.3).	0.30	105.00
February 9, 2024	DLR	Receive and review several messages re Stewart Grove property and possible purchase (.3)	0.30	105.00
February 9, 2024	DLR	Confer with B. Lee re documents and exhibits for 299 Alhambra settlement (.3)	0.30	105.00
February 12, 2024	YCC	Review, analyze and revise draft motion to approve settlement regarding Coral Gables real property (.6).	0.60	90.00
February 12, 2024	RN	Reviewing Google Workspace re: searching for documents on Stewart Grove and Urbin Miami Beach properties.	5.80	1,740.00
February 12, 2024	DLR	Receive and review messages between Stewart lender and potential purchaser (.1); exchange messages and confer with B. Lee re preparation for various calls	3.10	1,085.00

		regarding properties and other issues (.3); prepare for and participate in call with lender counsel re Commodore and other properties (1.0); prepare for and participate in call with City of Coral Gables re Valencia property (.6); receive and review further follow up messages from B. Lee re same (.2); exchange messages and follow up re utility billings for Miami Beach property and necessity of utility service (.3); follow up with F. Schwartz re Los Pinos listing agreement (.1); receive and review motion to appoint receiver in Los Pinos and exchange messages re same (.3); receive and review messages re Villa Valencia CO list of items to complete (.2)		
February 12, 2024	DLR	Review and draft revisions to motion to approve settlement re 299 Alhambra property and draft message to B. Lee re same (.8)	0.80	280.00
February 13, 2024	YCC	Continue reviewing, analyzing and revising draft motion to approve settlement regarding Coral Gables real property (.6); review and revise draft lender's affidavit and proposed order granting motion (.5).	1.10	165.00
February 13, 2024	LXS	Edit spreadsheet for Stewart properties to include additional recorded information.	1.00	250.00
February 13, 2024	DLR	Exchange messages with B. Lee and Y. Castro re motion to approve 299 Alhambra settlement (.2); receive and review L. Stein memo re Stewart liens (.2)	0.40	140.00
February 14, 2024	DLR	Receive and review P. Humbert message and attached comments on motion re 299 Alhambra (.3); review 299 Alhambra payoff analysis (.2); receive and review B. Lee message to P. Humbert and revised motion (.2); receive and review B. Lee message and draft motion to auction personal property (.2); review Y. Castro message and chart re UCC filings and review	1.70	595.00

		same (.4); exchange messages with B. Lee re Minorca closing (.2); further review auctioneer motion (.2)		
February 14, 2024	LXS	Edit Stewart and Urbin Miami Beach spreadsheets to include additional recorded information.	0.80	200.00
February 14, 2024	YCC	Multiple conferences with B. Lee re: administering personal property at Coral Gables property and dealing with any leased equipment (.3); telephone call with auctioneer re: inspecting personal property at Coral Gables property and his proposal for same (.2); arrange for access to Coral Gables property (.2); prepare notes for inspection (.1).	0.80	120.00
February 14, 2024	YCC	Conduct UCC search in Florida for receivership entities; review/obtain UCC financing statements and email same (.8).	0.80	120.00
February 15, 2024	YCC	Conduct UCC search in Florida for non-receivership entities; review/obtain UCC financing statements and email same (.7).	0.70	105.00
February 15, 2024	YCC	Telephone call with auctioneer re: today's inspection (.1); meet with auctioneer to inspect and photograph personal property at the Coral Gables property and discuss logistics of same (1.6); transmit receivership order to auctioneer (.1); email to B. Lee re: today's inspection (.1); email to B. Lee re: leased printer and photos of same (.1).	2.00	300.00
February 15, 2024	DAS	Review additional City notice/proceedings and landlord correspondence and enclosures regarding code violations (.3); draft pair of correspondence memoranda to Receiver addressing potential legal strategy and next steps with the Commodore property to address various pending matters (.3)	0.60	210.00

February 15, 2024	DLR	Receive and review messages re appraiser for Miami Beach property (.2); Exchange messages with B. Lee and D. Samole re Commodore ground leases and documents re same (.2); receive and review discussion of rights and obligations under ground lease (.3); exchange messages with J. Alderman re appraisal on Washington Ave. property (.2); confer with B. Lee re Miami Beach property and exchange messages re same (.5); receive and review Goodkind Florida messages re firm documents (.3); exchange messages and confer with F. Schwartz re R. Kapoor yacht, Los Pinos actions (.3); consider, analyze and research Kapoor homestead claim re Los Pinos property (.5); exchange messages and follow up re Miami Beach confidentiality agreement and review same (.3).	2.80	980.00
February 15, 2024	DLR	Receive and review further messages and information re auctioneer motion and UCC filings (.2); exchange messages with B. Lee and buyer counsel re Minorca parcel sale (.2); review Minorca settlement statement and exchange messages with B. Lee re same (.2)	0.60	210.00
February 16, 2024	YCC	Confer with B. Lee re: case administration and auctioneer's proposal (.2); conduct lien search in Montana against 7240 US Hwy 2 SPE, LLC and related subsidiaries; review and analyze liens against Flathead, MT property; email to B. Lee re: same (.2).	0.40	60.00
February 16, 2024	YCC	Conduct and review litigation search against 7240 US Hwy 2 SPE, LLC and related subsidiaries (.2).	0.20	30.00
February 16, 2024	DLR	Receive and review P. Humbert message with draft foreclosure judgment (.3); receive and review revised payoff re 299 Alhambra (.2)	0.50	175.00

February 16, 2024	DLR	Exchange messages with B. Lee and A. Almazen re potential purchase of Stewart Grove property, and follow up re same (.4); exchange messages and confer with B. Lee re Montana property (.3); receive and review R. Hyman message and documents re lender funding (.3); receive and review B. Lee message and documents re Montana entities ownership structure (.3)	1.30	455.00
February 19, 2024	DLR	Receive and review 299 Alhambra draft foreclosure judgment and confer with B. Lee re same (.3); further review draft settlement motion and order and exchange messages with B. Lee re same (.3); further exchange messages re 299 Alhambra agreed final judgment and review further revisions to judgment, motion and order (.3); receive and review messages and documents re Minorca closing (.2)	1.10	385.00
February 19, 2024	DLR	Confer with A. Almazan re potential purchase of Stewart property and confer with B. Lee re same (.7); exchange messages re 515 Valencia items to complete for CO (.2); review documents re loans against Stewart property (.4); receive and review message re data room for Miami Beach (.1); further exchange messages with F. Schwartz re Los Pinos and yacht actions (.2); receive and review further message from A. Almazan re Stewart potential purchase (.2); receive and review several messages re Stewart remaining construction budgets (.3)	2.10	735.00
February 19, 2024	YCC	Confer with B. Lee re: personal property in buyer's possession (.1); review and analyze liquidation value of personal property (.2).	0.30	45.00
February 19, 2024	YCC	Review and analyze initial and revised auctioneer's proposal for personal property at Coral Gables property (.4); telephone conference	1.00	150.00

		with auctioneer re: appraisal of personal property and coordinating same (.2); confer and email with B. Lee re: same (.2); review and add comment to draft motion to retain auctioneer (.1); follow up on transferring hard drives and laptops to Receiver's office (.1).		
February 20, 2024	DLR	Confer with B. Lee re potential resolutions re Stewart property (1.0); further review information re Stewart property re potential resolution (.8); Participate in conference call with J. Alderman and B. Lee re Washington Ave., Los Pinos properties (.5); further confer with B. Lee and forensic accountants re Stewart property (.3); exchange several messages with counsel re motion to stay Mironest action re 515 Valencia property, review and suggest revisions re motion to recuse and stay (.4); receive and review draft subpoenas for bank records and exchange messages with B. Lee re same (.3); receive and review "letter of intent" re Commodore property and exchange messages with B. Lee re same (.3); further exchange messages with F. Schwartz and R. O'Brien re stay of actions against Los Pinos and yacht (.4); receive and review listing agreement from F. Schwartz for Los Pinos (.2); revise confidentiality agreement re Miami Beach and exchange messages with B. Lee re same (.7)	4.90	1,715.00
February 20, 2024	DLR	Receive and review further messages from P. Humbert and revised documents re 299 Alhambra and confer with B. Lee re same (.3); consider and discuss issue re preservation of claims against third parties (.3)	0.60	210.00
February 21, 2024	YCC	Meet with Receiver and team to inspect offices at Coral Gables property and transfer hard drives and laptops including meeting with auctioneer to prepare his appraisal	6.50	975.00

		of personal property (6.1); multiple conferences with B. Lee re: same (.4).		
February 21, 2024	DLR	Receive and review Stewart construction vendor balances (.3); Review analysis re Stewart funds (.8); Review information and documents to prepare for call with lender counsel (1.7); confer with B. Lee re same (.4); Participate in call with lender counsel and B. Lee re loans, and follow up re same (.5); exchange messages with Commodore tenant re potential interest in acquisition (.2); receive and review purchase offer for Miami Beach, exchange messages with B. Lee and J. Alderman re same (.5)	4.40	1,540.00
February 22, 2024	DLR	Site visit to Miami Beach property and meeting with J. Alderman and R. Gutlohn re same (1.5); follow up re utility billing for Miami Beach property (.2)	1.70	595.00
February 22, 2024	DLR	Receive and review B. Lee message and further revisions to motion, order and final judgment on 299 Alhambra (.2); further exchange messages re claims against third parties (.2)	0.40	140.00
February 23, 2024	YCC	Confer with B. Lee re: Miami Beach and other LV properties (.1).	0.10	15.00
February 23, 2024	DLR	Participate in conference call with City re Valencia property, and follow up re same (.5); review information from City re right-of-way items (.2); review further messages and information re completion of open items (.3); receive and review several messages from R. Neary re LV tax returns (.3); review documents and information in Google Workspace re yacht purchase and financial information re same (2.5); review company tax returns and financial documents (1.5); receive and review message re offer to purchase Valencia unit and exchange messages with B.	6.00	2,100.00

		Lee re same (.2), exchange messages with B. Lee re information on access to bank and Quickbooks information (.2); respond to purchase offer on Miami Beach property (.3)		
February 24, 2024	DLR	Exchange several messages with F. Schwartz and B. Lee re listing agreement for Los Pinos and J. Kapoor interest in [REDACTED] (.5)	0.50	175.00
February 26, 2024	YCC	Review and analyze inventory of personal property at Coral Gables property (.2); telephone call with auctioneer re: same (.1).	0.30	45.00
February 26, 2024	YCC	Review and update cast of characters for service of sale motion for Coral Gables property (.5).	0.50	75.00
February 26, 2024	DLR	Receive and review transcript from CMC in Los Pinos case (.3); receive and review F. Schwartz messages re Los Pinos case (.2); confer with C. Schmidt and B. Lee re analysis of potential litigation claims and further follow up re information to review for same (1.5)	2.00	700.00
February 26, 2024	DLR	Receive and review messages re SEC conferral on 299 Alhambra motion and message to R. Kapoor counsel re same (.2)	0.20	70.00
February 26, 2024	YCC	Review and prepare exhibits to 299 Alhambra sale motion (.8).	0.80	120.00
February 27, 2024	DLR	Consider approach re Los Pinos property and confer with B. Lee re same (.6); exchange messages with B. Lee re Stewart property loans (.2); Participate in call with A. Almazan and B. Lee re potential purchase of Stewart property and follow up re same (.5); investigate, review and consider documents and communications re certain investor (2.8); receive and review message from T. Lehman re potential sale free and clear of unit in receivership case and underwriter requirements re same and further confer with B. Lee re same and review Minorca	5.40	1,890.00

		closing documents re same (.4); further review and analyze documents re 2EE loans (.7); exchange messages with J. Alderman re insurance inspector access to Stewart property (.2)		
February 27, 2024	FSR	Attention to, and coordinate execution of Certification of Non-Foreign Status, Warranty Deed, and Seller Settlement Statement in preparation for closing	0.50	75.00
February 27, 2024	DLR	Review documents re Minorca closing and B. Lee messages re same (.3); review messages re 299 Alhambra settlement and F. Schwartz response, and confer with B. Lee re same (.4); respond to F. Schwartz re 299 Alhambra motion (.2); receive and review further communications with 299 Alhambra lender re same (.2); review message to SEC re auctioneer motion (.1)	1.20	420.00
February 27, 2024	YCC	Email and confer with B. Lee re: personal property in buyer's possession from prior appraisal; review email to buyer re: payment (.2).	0.20	30.00
February 27, 2024	YCC	Review and redact prices from auctioneer's personal property appraisal (.4).	0.40	60.00
February 28, 2024	YCC	Review and revise motion to approve settlement and authorize consent to foreclosure judgment (.5); confer with B. Lee re: serving interested parties via US mail and notice to partners/investors (.1); finalize, file and serve settlement motion on interested parties and submit proposed order (1.1).	1.70	255.00
February 28, 2024	DLR	Receive and review as-filed motion to approve 299 Alhambra settlement (.1)	0.10	35.00
February 28, 2024	DLR	Further analysis and exchange messages re loan funding on Stewart property (.8); receive and review communications between lender counsel and R. Kapoor	4.10	1,435.00

		counsel re Los Pinos action, order on motion for clarification, listing agreement (.2); further follow up re inquiry into funds for improvements to Los Pinos (.2); receive and review further messages with insurance inspector for Stewart (.1); exchange messages with B. Lee re Stewart loan documents and review and analyze same (.6); further review and search documents in Google Workspace re 2023 transactions (2.2)		
February 29, 2024	YCC	Work on letter to LV and Urbin K-1 partners re: motion for settlement (.2); review and obtain alternate addresses for non-receivership K-1 partners with 229 Alhambra addresses (.5); review and update spreadsheet (.3); prepare mailing labels for service of letter with receivership order (.3); review and revise letter (.1); email exchange with B. Lee re: same and certificate of service (.2); prepare and finalize certificate of service for internal purpose (.6).	2.20	330.00
February 29, 2024	DLR	Receive and review messages re Los Pinos property and Kapoor Business Purpose Affidavit (.2); exchange messages with third party re: interest in Commodore properties (.3)	0.50	175.00
February 29, 2024	YCC	Review and analyze discrepancy with personal property and make an adjustment to same (.2).	0.20	30.00
February 29, 2024	DLR	Exchange messages with B. Lee re confidentiality agreement for Miami Beach property (.2); review email and service list re 299 Alhambra motion and exchange messages with B. Lee re same (.3); receive and review order re briefing schedule on 299 Alhambra motion and exchange messages re same (.1)	0.60	210.00
March 1, 2024	DLR	Exchange messages and confer with B. Lee re Urbin Miami Beach	3.70	1,295.00

confidentiality agreement and marketing process (.3) Confer with V. Bonet and B. Lee re Valencia remaining work (.5); confer with B. Lee re Stewart property and J. Alderman message re same (.5); review J. Alderman messages re Stewart (.2); confer with J. Alderman and B. Lee re Stewart and further confer with B. Lee re same (.5); receive and review message and draft motion from ground lessor confer with B. Lee and D. Samole re same (.3); confer with B. Lee and D. Samole re hearing on motion for stay in Los Pinos action (.5); review Kapoor message and draft motion for stay and to sell Los Pinos in District Court and further confer with B. Lee and D. Samole re same (.4); receive and review J. Alderman messages re Kapoor motion (.2); exchange messages with D. O'Quinn re release of information regarding bond claims on Commodore property (.3)

March 1, 2024	DLR	Receive and review F. Schwartz message re 299 Alhambra appraisal (.1); review documents and emails re KDM commissioned appraisal (.8); confer with B. Lee re same (.3); draft response to F. Schwartz re same (.2); receive and review messages re Minorca closing (.2).	1.60	560.00
March 1, 2024	DAS	Review draft motion for stay to be filed in Receivership case with respect to Los Pinos house; review order denying same dealing with comparable arguments with the Yacht; review motion for stay on the Los Pinos residence filed in the state court action set for hearing next week which I will be participating for the Receiver; review lender's opposition to the motion for stay (.5); confer with receivership and get brought up to speed regarding all pending	1.90	665.00

		discussions with lender and other counsel regarding Los Pinos legal issues and items for next week's hearing (.6); discuss with counsel the pending Commodore property issues and items relating to ground lessor and lender (.3); review Commodore ground lessor draft motion and memorandum of law to intervene to seek relief from receivership injunction (.5)		
March 4, 2024	DLR	Prepare for and participate in call with lender counsel re Commodore (1.0); further confer with B. Lee re same (.3); participate in call with I. Coutts re Commodore and further confer with B. Lee re same (.6); Confer with B. Lee and Lamar Fisher re potential sale of Miami Beach and other properties (.5); research re Kapoor assertion of homestead interest in Los Pinos property owned by LLC (.7)	3.10	1,085.00
March 4, 2024	YCC	Review and analyze R. Kapoor's response to motion for settlement (.2).	0.20	30.00
March 4, 2024	DLR	Exchange messages with buyer counsel re Stewart purchase agreement (.2); confer with B. Lee re reconciliation of lien claims and follow up messages re same (.3); further exchange messages, review documents and emails, and follow up with F. Schwartz re 299 Alhambra earlier appraisal (1.0); receive and review Kapoor objection to 299 Alhambra settlement and preliminary evaluation of response to same (.8); confer with interested party re Valencia and exchange follow up emails re same (.3)	2.60	910.00
March 5, 2024	YCC	Review and prepare service list for motion to approve sale and settlement of Stewart Grove property (.8).	0.80	120.00
March 5, 2024	YCC	Email exchange with B. Lee re: R. Kapoor's claim to personal property	0.10	15.00

March 5, 2024	DLR	at 299 Alhambra office building (.1). Review and revise draft motion to approve Stewart Grove sale (.4); receive and review buyer's contract and addendum re Stewart Grove (.5); receive and review further message from A. Almazan re same (.1); confer with lender counsel re Alhambra and Kapoor objection (.2); review B. Lee message to F. Schwartz re motion to employ auctioneer for 299 Alhambra personal property and further messages re same (.2); research re stale appraisal (.3); exchange messages re research on stale appraisal and review cases re same (.4); further review Kapoor Response to Motion for Settlement re Alhambra (.3); draft reply to Kapoor response re Alhambra settlement (1.6).	4.00	1,400.00
March 5, 2024	DLR	Prepare for and participate in call with Commodore landlord counsel re motion to intervene and for relief from stay (.8); further confer with B. Lee re same (.2); further review Kapoor motion to stay Los Pinos foreclosure and to employ broker (.3); begin to draft response (1.7); receive and review message re prior term sheet for Commodore transaction (.2); receive and review messages re Commodore insurance issues (.3); receive and review communications with potential appraisers (.3).	3.80	1,330.00
March 6, 2024	DLR	Confer with B. Lee re Stewart sale, Los Pinos stay motion, 299 Alhambra personal property (.3); review contract and addendum re Stewart property and exchange messages with A. Almazen re same (.5); exchange messages re 299 Alhambra property sale and employment of auctioneer (.2);	3.10	1,085.00

		<p>further review and revise draft motion to sell Stewart property (.4); confer with J. Alderman re Stewart (.3); confer with A. Almazan and B. Lee re Stewart contract and follow up with B. Lee re same (.5); receive and review messages from F. Schwartz re Kapoor claimed personal items at Alhambra (.3); further confer with B. Lee re 299 Alhambra personal property and revisions to motion to address Kapoor issues (.3); further exchange messages with F. Schwartz re same (.3).</p>		
March 6, 2024	YCC	<p>Confer with B. Lee re: R. Kapoor's personal items at 299 Alhambra office building (.4); review and analyze auctioneer's appraisal to identify personal items and locate photos of same; follow up with an email summary of same (1.3).</p>	1.70	255.00
March 7, 2024	YCC	<p>Confer with B. Lee re: draft response (.1); review and revise Receiver's response to R. Kapoor's Motion to Stay Foreclosure Proceedings and assemble exhibit; file same (.4).</p>	0.50	75.00
March 7, 2024	DAS	<p>Review recently filed pleadings in the SEC receivership case (.1); discuss latest developments in discussions concerning Los Pinos residence, Stewart property and state court hearing tomorrow; confer with Receiver as to position for tomorrow's hearing; prepare hearing presentation (.4); review SEC joinder to Receiver response n opposition (.1)</p>	0.60	210.00
March 7, 2024	YCC	<p>Review and revise motion for approval of auctioneer and auction sale of personal property and proposed order and assemble exhibits to same (.9); file and serve motion and submit proposed order (.7).</p>	1.60	240.00
March 7, 2024	YCC	<p>Telephone call with J. Chirinos re: service of personal property auction (.1).</p>	0.10	15.00

March 7, 2024	YCC	Perform lien search against Stewart Grove real properties; review and analyze recorded liens and revise service list to motion to approve sale/settlement (.8); email with B. Lee re: additional lien to include in motion (.1).	0.90	135.00
March 7, 2024	DLR	Further review and revise motion to approve Stewart Grove sale (.6); receive and review messages re Alhambra personal property sale and resolution of Kapoor issues (.3)	0.90	315.00
March 8, 2024	DAS	Prepare for state court hearing on Los Pinos matters by retrieving/reviewing batch of applicable state court pleadings filed in last 24-48 hours including waive of third-party discovery seeking personal financial information against Kapoor and other related matters, and motions to quash same (.3); attend and participate in state court hearing on Kapoor's motion to stay state court proceedings in the Los Pinos matters and related case matters (.6); provide hearing report and other pending discussions to Receiver (.2); review proposed post-hearing order denying motion for stay; discuss with Receiver and provide comments/redline version as to same (.2); follow up emails with cross-edits and negotiations regarding the order and associated Los Pinos state court matters (.2)	1.50	525.00
March 8, 2024	YCC	Review and analyze title report for Stewart Grove 1 and 2 properties and compare liens to online search results; review service list to draft motion for settlement (.4).	0.40	60.00
March 8, 2024	YCC	Review, analyze and redact appraisal for certain property (.3).	0.30	45.00
March 11, 2024	DAS	Receive and review court-entered order adopting my position presented no behalf of the Receiver denying Mr. Kapoor's motion to stay	0.10	35.00

state court proceedings in the Los Pinos matter (.1)				
March 13, 2024	YCC	Verify claimant's lien is included in motion to approve settlement with Stewart Grove property (.1).	0.10	15.00
March 13, 2024	DLR	Receive and review messages from F. Schwartz, J. Raskin and B. Lee re settlement agreement with lender for yacht (.2)	0.20	70.00
March 15, 2024	DLR	Receive and review B. Lee messages with R. O'Brien and lender counsel re yacht proposed settlement and turnover of surplus to receivership estate (.3); receive and review B. Lee message and attached letter re lender proposal on Commodore (.3)	0.60	210.00
March 18, 2024	DLR	Review lender proposal re Commodore and discuss with B. Lee (.4); participate in call with ground lease counsel re Commodore and follow up with B. Lee re same (.4); participate in call with Commodore lender counsel and further confer with B. Lee re same (.5); exchange messages with B. Lee re Commodore ground lease (.3); Receive and review further communications between B. Lee and lender counsel re yacht settlement (.3)	1.90	665.00
March 18, 2024	DAS	Confer with Receiver as to ongoing discussions and open issues raised by Commodore Plaza ground lessor (.2); review applicable portions of ground lease and Verizon lease documents (.5); draft memo to Receiver discussing various provisions therein, and analyzing items and issues therein (.8)	1.50	525.00
March 18, 2024	DLR	Further review and analyze lender proposal re Commodore and discuss with B. Lee (.4); review Verizon documents and B. Lee message to D. Samole re same (.3).	0.70	245.00
March 18, 2024	DLR	Review J. Alderman proposed edits to Stewart purchase agreement	0.40	140.00

Date	Code	Description	Hours	Amount
March 19, 2024	DLR	addendum and exchange messages with B. Lee and S. Ferrara re same (.4)	0.50	175.00
March 19, 2024	DLR	Receive and review J. Alderman email and attachments re Motion to Appoint Receiver in Los Pinos action and further messages re same (.3); receive and review J. Feigeles messages re mediation and further exchange messages re mediation (.2)	0.90	315.00
March 20, 2024	DLR	Review and revise Stewart Grove sale contract and addendum and exchange messages with B. Lee re same (.5); exchange messages re Miami Beach NDA (.2); exchange messages re status of approvals for Miami Beach (.2).	0.60	210.00
March 20, 2024	DLR	Review information re Commodore transactions and confer with B. Lee re same (.3); review documents and information re trust account transactions and exchange messages with B. Lee and forensic accountants re same (.3)	1.50	525.00
March 20, 2024	DLR	Receive and review Kapoor motion for advancement of legal fees, preliminary review of documents and research re same (1.5)	0.50	175.00
March 20, 2024	DLR	Review several messages re Los Pinos mediation (.2); receive and review Los Pinos appraisal and further exchange messages re same (.3)	0.20	70.00
March 20, 2024	DLR	Receive and review further revisions to Stewart addendum and transmittal to buyer counsel (.2)	0.20	30.00
March 21, 2024	YCC	Confer with B. Lee re: proposed order on motion for auction of personal property; revise and submit proposed order to Judge Becerra (.2).	1.00	350.00
March 21, 2024	DLR	Confer with Commodore ground lease counsel and further confer with B. Lee re same (1.0)	0.50	175.00
March 21, 2024	DLR	Receive and review communications with and		

Date	Party	Description	Hours	Amount
March 22, 2024	RN	documents provided to appraiser for Commodore by B. Lee (.3); exchange messages re Commodore construction budgets (.2)	6.60	1,980.00
March 22, 2024	DLR	Searches in Google Vault re: Coconut Grove Commodore Plaza properties - documents/information for appraiser. Saving files to folder. Confer with B. Lee re: same. Confer with F. St. Remy re: Teamworks download of material.	2.10	735.00
March 22, 2024	DLR	Confer with B. Lee and counsel for potential purchaser of Miami Beach property and confer with B. Lee re same (.5); confer with B. Lee and third party re potential purchase of Commodore property (.3); exchange messages with B. Lee re analysis of Commodore liens (.3); receive and review A. Almazan message re Stewart agreement and further messages re same (.3); confer with B. Lee re Stewart Grove purchase agreement and addendum (.3); confer with A. Almazan re same (.3); receive and review order authorizing auction of personal property (.1)	2.00	700.00
March 25, 2024	YCC	Confer with forensic accountants and B. Lee re analysis of Commodore, Stewart, Valencia, Miami Beach transactions and further review and analysis re same (1.5); receive and review message from City National Bank re subpoena response and exchange messages with Y. Castro and B. Lee re same (.2); receive and review several messages from F. Schwartz and J. Alderman re Kapoor claim of TBE interest in Los Pinos property (.3)	0.40	60.00
March 25, 2024	YCC	Review and analyze order granting motion for auction sale and coordinate service of same on interested parties (.3); telephone call from auctioneer re: setting up	0.40	60.00

		for auction sale, email to B. Lee re: same (.1).		
March 25, 2024	RN	Performing searches in Google Vault on Commodore Plaza properties to provide to appraiser. Searching Google Vault/Workspace for documents relating to unit owners in Commodore.	6.90	2,070.00
March 25, 2024	DLR	Confer with B. Lee re status and next steps for disposition of various properties (.3); confer with surety counsel re customer deposits and escrow funds and confer with B. Lee re same (.5); exchange further messages with surety counsel re indemnitors on bonds and additional information re same (.2); draft notices re conference with surety counsel (.3); exchange messages with A. Almazan re buyer's broker commission on Stewart sale and confer with B. Lee re same (.3); receive and review analysis re flow of funds for Stewart project loans (.3)	1.90	665.00
March 25, 2024	DLR	Receive and review messages re Los Pinos mediation (.1); Receive and review information and documents re Los Pinos bankruptcy filing, preliminary analysis re same and discuss with B. Lee (.5); research re effect of bankruptcy on asset freeze order (.7); further review bankruptcy filings (.3); further analysis of Asset Freeze and impact on bankruptcy case (.5)	2.10	735.00
March 26, 2024	DLR	Confer with B. Lee re Stewart sale agreement (.2); Review edits to Miami Beach NDA and B. Lee messages re same (.2); confer with B. Lee re Commodore documents (.3); receive and review prior Commodore appraisals (.3)	1.00	350.00
March 26, 2024	DLR	Review Asset Freeze Order and research and analyze effect on authority to file Los Pinos bankruptcy, further research re SEC police and regulatory powers re asset freeze and effect of automatic	2.90	1,015.00

		stay (1.5); confer with J. Alderman and B. Lee re Los Pinos bankruptcy (.5); further research re Asset Freeze Order effect in bankruptcy and draft message to R. O'Brien re same (.7); review B. Lee message to appraiser for Valencia and draft motion to approve engagement (.2)		
March 27, 2024	DLR	Confer with B. Lee re motion to approve Stewart sale (.3); site visit to Commodore properties to inspect and meet with appraiser and confer with B. Lee re same (2.5); confer with I. Coutts re Commodore tenant issues and potential purchase offer (.5); receive and review communications with surety counsel re collateral for bonds (.2); confer with B. Lee re communication with City of Miami re Commodore and review B. Lee message re same (.3); exchange messages with B. Lee and S. Ferrera re Stewart sale and review of title commitment (.3)	4.10	1,435.00
March 27, 2024	DLR	Confer with forensic accountants and B. Lee re analysis of customer deposits and other property transactions (1.6); receive and review messages between M. Roher and J. Alderman re Los Pinos bankruptcy (.2)	1.80	630.00
March 27, 2024	DLR	Receive and review R. O'Brien message and attached order re advancement claim and further analysis re same (.4)	0.40	140.00
March 28, 2024	YCC	Meet with auctioneer at 299 Alhambra Circle to setup and tag personal property for upcoming auction and set aside potential claim to certain items, including call with B. Lee and auctioneer re: to consider certain items to be auctioned (4.7).	4.70	705.00
March 28, 2024	DLR	Receive and review further messages between M. Roher and J. Alderman re Los Pinos bankruptcy and filings and transcripts re same (.3).	0.30	105.00

March 28, 2024	DLR	Confer with B. Lee and S. Ferrara re Stewart purchase agreement (.6); review L. Fisher Miami Beach proposal and confer with B. Lee re same (.3); exchange messages with F. Schwartz re Kapoor claimed personal property at Alhambra and confer with B. Lee re same (.3); receive and review B. Lee message to P. Humbert re auction of personal property at Alhambra (.1); receive and review V. Bonet messages re potential purchaser for Commodore and confer with B. Lee re same (.3)	1.60	560.00
March 29, 2024	YCC	Telephone call with auctioneer re: certain photos (.1); prepare list of items claimed by R. Kapoor not on auctioneer's inventory (.2).	0.30	45.00
March 29, 2024	DLR	Further review Los Pinos bankruptcy filings and confer with B. Lee re same (.3)	0.30	105.00
March 29, 2024	DLR	Call with B. Lee and party with inquiry re 299 Alhambra (.4).	0.40	140.00
March 29, 2024	DLR	Further research re indemnification and advancement claims in receivership cases (.9); Work on response to Kapoor Motion for Advancement of Indemnification Expenses and further review research re same (3.8)	4.70	1,645.00
March 30, 2024	DLR	Receive and review messages from J. Alderman and documents re Los Pinos bankruptcy (.3)	0.30	105.00
March 31, 2024	YCC	Telephone call from auctioneer re: status of auction setup and marketing items (.1).	0.10	15.00
Total for ASSET DISPOSITION			235.50	71,150.00

CASE ADMINISTRATION

January 12, 2024	LXS	Research SEC receivership cases before Judge Altonaga. Prepare a description of each case for the Receiver.	2.80	700.00
January 12, 2024	YCC	Confer with B. Lee re: new receivership case (.2); review receivership order (.2) and prepare cover letter to deliver to banking institutions with receivership order (.6); review and finalize cover letter (.1); prepare for and travel to various banks to deliver cover letter and receivership order [reduced by .4 for 50% travel time] (3.1); attention to obtaining certified copy of receivership order (.2); email exchange with B. Lee re: status of service of banks with cover letter and receivership order (.2); research bank information on Woodforest National Bank and Bank of America (.2); coordinate service of cover letter and receivership order on Woodforest National Bank (.2); prepare status chart of banks to serve receivership order with cover letter (.8).	5.40	810.00
January 12, 2024	DLR	Exchange messages and confer with B. Lee re appointment as Receiver (.4); review receivership order (.4); preliminary review of SEC complaint and asset freeze motion (1.0); exchange messages with A. Fine re receivership appointment and transition issues (.3); prepare for and participate in call with B. Lee and A. Fine re pre-receivership appointment as manager and status of various assets (2.0); review draft notices of appearance (.1); receive and review several emails re appointment of receiver and notice of receivership (.3); receive and review L. Stein memo re receivership cases before Judge Altonaga (.2); further confer with B. Lee re notices of	4.90	1,715.00

		receivership order in pending state court cases (.2)		
January 13, 2024	YCC	Coordinate transmittal of receiver's letter with order appointing receiver to Bank of America via facsimile; exchange messages re: same (.3).	0.30	45.00
January 13, 2024	DLR	Continued review of SEC Complaint and exhibits, asset freeze motion and exhibits, and analysis of immediate and additional case management issues (2.5); confer and exchange several messages with B. Lee re immediate case management issues (1.0); receive and review F. Schwartz message re pending matters for R. Kapoor (.2); continued analysis of information from SEC filings and draft memo re same (1.5); exchange messages with B. Lee re same (.3); Review UCC filings and preliminary analysis re Location Venders secured lender, draft message to B. Lee re same (.5); starts drafts of pending litigation matters and cast of characters and exchange messages with B. Lee re same (.5)	6.40	2,240.00
January 14, 2024	DLR	Continued analysis of entities and properties and exchange messages with B. Lee re same (1.8); exchange messages with P. Battista re LV / URBIN (.2); review B. Lee notes for meeting with V. Bonet and R. Gonzalez (.3).	2.30	805.00
January 15, 2024	LXS	Prepare spreadsheet of addresses for receivership entities, non receivership entities, and additional entities that own property.	2.80	700.00
January 15, 2024	YCC	Review emails re: additional service of receivership order on banking institutions and response from Centennial Bank (.1); coordinate service of receivership order and cover letter on Woodland National Bank (.1); update status chart of banks served with receivership order and cover letter (.1).	0.30	45.00

January 15, 2024	YCC	Review spreadsheet with contact information of all defendants and other entities not part of the receivership (.1).	0.10	15.00
January 15, 2024	YCC	Review and analyze notices of filing receivership order and list of pending litigation (.2).	0.20	30.00
January 15, 2024	DLR	Exchange messages with A. Fine re transition issues (.3); meeting with B. Lee, M. Yip, R. Gonzalez, V. Bonet and site visit at 299 Alhambra and further confer with B. Lee re same (4.0); prepare for call with B. Goodkind (.8); receive and review message and documents from G&F re pending litigation matters and filing of receivership order (.2); Receive and review message from T. Lehman re 515 Valencia property and further review materials re same (.3); further review of receivership order re scope of stay of proceedings (.4); review and circulate notes from meeting with V. Bonet (.4); review B. Lee outline for call with B. Goodkind (.3); draft message to B. Goodkind re information requested by receiver (.2)	6.90	2,415.00
January 15, 2024	DLR	Review Mironest complaint (.6); draft message to counsel in 299 Alhambra action re stay (.3); exchange messages with P. Humbert (.2); draft message to T. Lehman re receivership order stay (.2); draft message to Mironest counsel re receivership order stay (.2)	1.50	525.00
January 16, 2024	DLR	Receive and review documents and information from Goodkind firm (.4); receive and review B. Lee outline for Goodkind Florio meeting (.2); Prepare for and participate in conference call with B. Goodkind and K. Florio re properties and pending litigation (2.0); receive and review organizational charts provided by Goodkind Florio (.3); prepare for and participate in	7.40	2,590.00

		conference call with F. Schwartz and J. Feigeles re R. Kapoor litigation and related matters (1.0); review emails and materials from Goodkind & Florio (.7); participate in conference call with SEC counsel and further confer with B. Lee re same (1.4); exchange messages with P. Battista re meeting to discuss LV / URBIN (.1); prepare SEC document access letter (.1); update master spreadsheet and confer with B. Lee re same (.4); review message and draft motion to extend time to file accountings and exchange messages with B. Lee and with SEC counsel re same (.3); review complaint and receivership order and draft message to R. Kapoor counsel re Patriots United being a receivership entity (.3); exchange messages with counsel for 299 Alhambra receiver (.2)		
January 16, 2024	YCC	Travel to various banks to deliver cover letter and receivership order [reduced by .5 for 50% travel time] (1.7); coordinate delivery of cover letter and receivership order on additional banks (.3); confer with B. Lee re: bank responses relating to assets frozen (.1); review and update status chart for banks (.7).	2.30	345.00
January 16, 2024	YCC	Review receivership order and revise generic transmittal letter to accompany receivership order (.4); review and revise master spreadsheet of receivership entities to add tax ID numbers (.2).	0.60	90.00
January 17, 2024	YCC	Prepare list of banks served with order appointing receiver (.2); review Wells Fargo's response to receivership order and update chart (.1).	0.30	45.00
January 17, 2024	YCC	Review and revise receiver's letter enclosing receivership order (.1); prepare and process receiver's letter to various entities and individuals for service by US mail and electronic mail (1.0); prepare	2.00	300.00

		mailing labels (.5), confer with B. Lee re: same (.1); prepare certificate of service with service list (.3).		
January 17, 2024	DLR	Prepare for and participate in call with P. Battista and further discuss with B. Lee (1.5); participate in meeting with controller (1.4); confer with J. Alderman re loans and investments (.7); receive and review emails and information from V. Bonet re corporate organization and authority issues (.3); update master spreadsheet re information on assets, properties, and pending litigation (.4); review messages re LV / URBIN financial data (.2)	4.50	1,575.00
January 17, 2024	DLR	Receive and review messages between R. Kapoor counsel and SEC re motion for extension to provide accounting (.2); review revised motion (.1); further review messages re proposed order (.2)	0.50	175.00
January 17, 2024	YCC	Review and e-record certified copy of order appointing receiver in Miami-Dade and Broward Counties (.6); prepare transmittal and document cover page for recording same in Palm Beach County and request check (.4).	1.00	150.00
January 18, 2024	LXS	Prepare Receiver's Certificate of Interested Parties.	1.60	400.00
January 18, 2024	DLR	Receive and review several messages from J. Chirinos re accounting records and bank documents (.3); exchange messages with external accountants (.2); receive and review messages re data backup (.2); exchange messages re Certificate of Interested Parties and follow up re preparation of same (.3); exchange messages with B. Lee re additions to CIP (.3)	1.30	455.00
January 19, 2024	LXS	Meet with Receiver and Mrs. Penalver to discuss preparing and filing the annual report for the Receivership Entities.	1.20	300.00

January 19, 2024	DLR	Exchange several messages with B. Lee re pending litigation matters and review dockets re same (.3); exchange messages with T. Lehman re 515 Valencia litigation (.2)	0.50	175.00
January 19, 2024	LXS	Research forms and fees for changing the mailing address, principal address, registered agent, and authorized persons of a Florida LLC.	0.40	100.00
January 19, 2024	LXS	Meet with Mr. Rosendorf to discuss case background and upcoming tasks as counsel for Receiver.	0.40	100.00
January 19, 2024	RCP	Meet with L. Stein to discuss new assignment to change RA for corporate entities; begin pulling Detail by Entity Names from Division of Corporations for the 23 LLCs in preparation for filing the annual reports (1.0)	1.00	150.00
January 19, 2024	DLR	Exchange several messages re updating of SunBiz information for receivership entities and affiliates (.3)	0.30	105.00
January 19, 2024	YCC	Review communications from banks re: accounts for defendants; update status chart (.2); review email exchange re: JPMorgan Chase Bank's concerns and address same (.2); confer with B. Lee re: serving additional banks with receivership order and status of Montana case filing (.2); prepare receiver's correspondence to US Bank to serve along with receivership order to multiple locations and update status chart (.3).	0.90	135.00
January 19, 2024	YCC	Review emails re: administrative issues including updating Sunbiz information for company defendants (.2); review and obtain corporate information on Alliance Solutions Group LLC (.2); prepare list of parties and other financial institutions to serve with receivership order (.5).	0.90	135.00

January 19, 2024	YCC	Review and analyze notice of filing redacted documents with complaint and exhibits for receivership case (.1); prepare civil cover sheet for Montana action (.3); email exchange with B. Lee re: same (.1); confer with B. Lee re: civil cover sheet and opening case in Montana (.4); prepare exhibit A to civil cover sheet and finalize civil cover sheet (.3); review and analyze procedures for opening case in US District Court of Montana (.5) and telephone call with clerk's office re: same (.3); prepare submission of pleadings to clerk of court in Montana (.2) and email exchange re: same (.1); two telephone calls with clerk of court in Montana re: redacted pages and follow up with B. Lee re: same (.1).	2.40	360.00
January 19, 2024	DAS	Obtain background information for upcoming state court hearing on Stewart Ave property litigation matters; review receivership order as to scope and terms of litigation stay (.3)	0.30	105.00
January 22, 2024	YCC	Confer with B. Lee re: data compatibility (.1); attention to obtaining cost estimate to transfer data into Relativity (.2).	0.30	45.00
January 22, 2024	YCC	Emails with B. Lee re: additional banks to serve receivership order (.2); review and analyze list of national and thrift savings banks and obtain addresses and registered agent for same (.6); update status chart (.8); prepare mailing labels and revise transmittal letter; coordinate service of same with receivership order (.7); email with Receiver re: list of additional banks served with receivership order (.1); review and analyze Truist Bank's certified response to receivership order and update chart (.1).	2.50	375.00
January 22, 2024	LXS	Meet with Mrs. Penalver to discuss filing annual reports for receivership	0.20	50.00

Date	Attorney	Description	Hours	Amount
		entities (0.1). Review drafted annual reports (0.1).		
January 22, 2024	DAS	Review state court docket documents as part of preparing for tomorrow's status conference in Stewart Grove case; follow up with parties and court as to cancellation of tomorrow's hearings (.2)	0.20	70.00
January 22, 2024	LXS	Draft letter to Alliance Solutions notifying them of Receivership Order and requesting data export.	1.90	475.00
January 22, 2024	RCP	Continue retrieving Detail by Entity Name; discuss changes to be made with D. Rosendorf and L. Stein; finalize annual report filings with Division of Corporations for 22 of the 23 entities (5.5)	5.50	825.00
January 22, 2024	YCC	Review default letter from landlord's counsel re: ground leases for 3138 and 3120 Commodore Plaza and response to same (.1).	0.10	15.00
January 22, 2024	YCC	Confer with R. Penalver re: certificate of other affiliate/corporate disclosure statement (.3).	0.30	45.00
January 22, 2024	RCP	File Certificate of Other Affiliates/Corporate Disclosure Statement (.9)	0.90	135.00
January 22, 2024	DLR	Exchange messages with Gronlier counsel re receivership stay and cancellation of hearing (.2); exchange messages re cancellation of Stewart Grove hearing (.2); follow up and confer with R. Penalver re CIP filing (.3)	0.70	245.00
January 23, 2024	LXS	Draft Motion for Extension of Time to Respond to Complaint and Proposed Order.	1.00	250.00
January 23, 2024	YCC	Telephone call with vendor re: cost estimate for database setup; email exchange re: same (.4).	0.40	60.00
January 23, 2024	RCP	Call clerk's office re notice to re-file CIP; Re-File Certificate of Other Affiliates adding missing affiliates only per clerk's notice (.3)	0.30	45.00
January 23, 2024	YCC	Confer with B. Lee re: case administrative issues and Montana	0.30	45.00

Date	Code	Description	Hours	Amount
		properties (.2) confer with B. Lee re: call with developer (.1).		
January 23, 2024	RCP	Finalize filing Annual Reports for two remaining entities (.4)	0.40	60.00
January 23, 2024	DLR	Receive and review messages re Stewart Grove action and applicability of receivership stay (.2); draft message re same (.1); exchange messages re applicability of stay to 515 Valencia actions (.2)	0.50	175.00
January 24, 2024	YCC	Review and analyze order setting trial and pretrial schedule deadlines (.1).	0.10	15.00
January 24, 2024	YCC	Review, analyze and process documents from Alderman's firm (.2).	0.20	30.00
January 24, 2024	DLR	Exchange messages with M. Raymond re meeting to review loans and investments (.2); exchange messages with J. Alderman re stay of state court cases and administrative closure by state court judges (.2); exchange messages and follow up with R. Penalver re CIPs (.3); receive and review messages re extension of time for receiver to respond to SEC complaint (.1); confer with B. Lee re receivership stay and state court cases (.2); exchange messages with R. Kapoor counsel re indemnification claim under Operating Agreement (.2)	1.20	420.00
January 25, 2024	YCC	Prepare notice to post at 299 Alhambra property (.4); confer with B. Lee re: same and revise accordingly (.2).	0.40	60.00
January 25, 2024	YCC	Email exchange with vendor re: information requested for cost estimate of database (.1).	0.10	15.00
January 25, 2024	DLR	Receive and review messages re 515 Valencia litigation and stay (.1); receive and review draft proposed order re same and further messages re same (.2); Prepare for and participate in call with B. Gutlohn counsel re interests in	4.30	1,505.00

		various properties (1.5); prepare for and participate in call with M. Raymond and R. Hyman re interests in various properties (1.5); further confer with B. Lee re same (.5); exchange messages with Bercow counsel re receivership stay (.2); review documents re indemnification claims and draft message to B. Lee re same (.3)		
January 26, 2024	DLR	Exchange messages with R. Kapoor counsel re various issues (.2); Call with [REDACTED] and B. Lee (1.0); receive and review B. Lee follow-up message to J. Alderman (.1); confer with B. Lee re submission of proposed order in 515 Valencia case re receivership stay (.2)	1.50	525.00
January 30, 2024	YCC	Confer with B. Lee re: meeting Raymond at Coral Gables office (.1).	0.10	15.00
January 30, 2024	YCC	Review and analyze recorded receivership order in Palm Beach County; prepare transmittal of receivership order to record same in Montana (.2).	0.20	30.00
January 30, 2024	DLR	Further exchange messages re proposed order on receivership stay in 515 Valencia action (.2); receive and review R. Kapoor CIP and exchange messages with B. Lee re same (.2)	0.40	140.00
January 31, 2024	DAS	Perform review of dockets and pleadings for pair of state court hearings scheduled for tomorrow; exchange follow up emails regarding one hearing being cancelled and inquiring about other hearing and requesting zoom link if going forward (.2); review list from Receiver of other state court hearings scheduled in other matters in handful of matters and requested to review pleadings/docket to get status and hearing information (.1); perform search of applicable dockets and pleadings (.5); draft	1.00	350.00

Date	Code	Description	Hours	Amount
		responsive correspondence memo on each matter (.2)		
January 31, 2024	DLR	Exchange messages re motion to extend asset freeze (.1)	0.10	35.00
February 1, 2024	DAS	Attend state court calendar call for Bercow Radell Fernandez Larkin & Tapanes firm action against certain relief defendants under receivership, advising court of receivership stay and state court placing matter on inactive status (.5); draft hearing report to the Receiver and advise I went over proof of claim process with counsel (.1); review court-entered order placing Bercow Radell case on inactive status; send to Receiver (.1)	0.60	210.00
February 5, 2024	DLR	Confer with B. Lee, R. O'Brien, R. Kapoor counsel re document access and production (.8); follow up with B. Lee re same and exchange messages with SEC counsel re documents (.2); receive and review F. Schwartz message re Patriots United and sworn accounting (.1); exchange messages with R. Penalver re pending state court matters and notice of receivership order (.1)	1.20	420.00
February 6, 2024	DAS	Call with bond surety counsel regarding Washington Avenue property and upcoming coverage expiration date and options for extending coverage and addressing the premium (.4); draft call report to Receiver as follow up call with surety needed so she can provide them with updated information about the project and discussion can be had about the bond premium matters (.1); perform preliminary research and due diligence as to how such type of surety claims/situations handled in comparable cases (.3)	0.80	280.00
February 6, 2024	DLR	Exchange messages with counsel in Mironest action re stay and state court order recognizing same (.2)	0.20	70.00

February 7, 2024	RN	Reviewing SEC complaint and filings. Drafting Cast of Character list from SEC complaint/exhibits.	2.20	660.00
February 7, 2024	YCC	Confer with B. Lee re: returned mail; update cast of characters and bank status chart (.2); review emails re: tenants and update cast of characters (.4).	0.60	90.00
February 7, 2024	YCC	Review and update cast of characters spreadsheet and locate investor names (.4).	0.40	60.00
February 8, 2024	DLR	Confer with B. Lee re property management and related issues and follow up re same (.3); review D. Samole message re insurance provisions in Commodore ground lease (.2); research, analysis and draft memo re potential indemnification claims (1.8); receive and review messages re document management issues (.2)	2.50	875.00
February 8, 2024	YCC	Telephone call with clerk's office in Flathead County, Montana (.1); review and e-record Order Appointing Receiver in Flathead County, Montana (.2).	0.30	45.00
February 8, 2024	YCC	Review and analyze tax bill; telephone call to taxing authority in Flathead County, Montana re: same (.2).	0.20	30.00
February 8, 2024	DAS	Review Receiver request to examine the insurance issues for Commodore property ground leases; review same and draft memo to Receiver (.6); review copy of Plaintiff correspondence in state court matter with upcoming deadline advising court of receivership and request for case to placed on inactive status - awaiting entry of same (.1)	0.70	245.00
February 8, 2024	RN	Reviewing SEC filings and Receiver's case spreadsheets. Attending call with SEC. Confer with B. Lee re: review of company's servers and Google workspace. Call with MSP4 company re: data	5.40	1,620.00

Date	Code	Description	Hours	Amount
February 9, 2024	DLR	Meeting with V. Bonet and B. Lee to review information re properties (1.0); receive and review communications between Kapoor counsel and SEC counsel re freeze order and hearing date (.1)	1.10	385.00
February 12, 2024	DLR	Exchange messages with escrow agent counsel re release of certain information to surety (.2); confer with R. Kapoor counsel re discovery issues (.5); receive and review communications with Goodkind Florio re documentation on LV transactions (.2); receive and review messages re financial records of LV companies (.2); review and review information re action against CG Office and advise re Receivership Order stay (.2); follow up with escrow agent counsel (.1); exchange messages re mediation in SEC action (.1)	1.50	525.00
February 12, 2024	RCP	Telephone call to Intuit / QuickBooks regarding updating the accounts' billing and payment information for 9 entities (1.0)	1.00	150.00
February 12, 2024	DAS	Participate in call with Receivership team and lender about status of various projects, checklist on various production requests and related matters (.7); follow up meeting with Receivership team to discuss further background of recent discussions with other constituents on various issues on multiple properties, and allocate legal tasks to follow up and address various items (.5); review series of Verizon lease agreements and associated document with Receiver request to identify and excerpt/summarize applicable provisions; draft responsive correspondence to Receivership team with condemnation provisions excerpt/summary (.6); review correspondence from party	1.90	665.00

Date	Code	Description	Rate	Amount
February 13, 2024	DLR	representative registering continuing interest in property interest acquisition with request for meeting (.1) Confer with B. Lee re creditor potential intervention in SEC action (.2); further confer with B. Lee re access to Google workspace and review of documents and communications (.3); exchange messages re SEC mediation (.2); confer with B. Lee and counsel for Miami Beach unit purchaser (.6); review documents re confidentiality issues (.8); receive and review messages with R. Gonzalez re Quickbooks (.2); exchange messages with B. Lee re stay order in Valencia litigation (.2); review draft notice and order re mediation and messages re same (.2); receive and review R. O'Brien message and attached motion to strike affirmative defenses (.1)	2.80	980.00
February 13, 2024	YCC	Review and analyze documents and photos for leased printers/copiers; email with B. Lee re: same (.3).	0.30	45.00
February 13, 2024	RN	Reviewing Google Workspace re: searching for Urbin Miami Beach documents and list of professionals.	3.10	930.00
February 14, 2024	YCC	Telephone call to Flathead County, MT taxing authorities and left message (.1).	0.10	15.00
February 14, 2024	RN	Searching Google Workspace re: Urbin Miami Beach, Stewart Grove, and professionals.	1.90	570.00
February 14, 2024	DLR	Prepare for call with Commodore condo association (.2); participate in call re 515 Valencia association (.4); receive and review litigation hold letter and exchange messages with B. Lee re same (.2); exchange messages with T. Lehman re request for waiver of confidentiality agreement (.2); exchange messages with B. Lee re confidentiality agreement (.1)	1.10	385.00

February 14, 2024	DLR	Exchange messages with J. Alderman and B. Lee re Washington Ave. and Los Pinos properties (.3); review notice re status conference in Miami Beach foreclosure action and exchange messages with J. Alderman re same (.2); confer with J. Alderman re Miami Beach, Stewart, Los Pinos and advise B. Lee re same (.4); further exchange messages with J. Alderman re Los Pinos property and construction expenses (.2); receive and review messages re Urbin Miami Beach data room (.2); exchange messages and confer with B. Lee re Stewart property (.3); confer with B. Lee re Valencia issues (.3)	1.90	665.00
February 14, 2024	YCC	Review and update cast of characters list (.1).	0.10	15.00
February 15, 2024	DLR	Receive and review request for documents and discuss response (.3); prepare for and participate in call re same and further follow up re same (1.2); confer with B. Lee and review information re Google Workspace access (.5); receive and review messages from 299 Alhambra property vendor (.2); receive and review several messages re document storage and management (.2).	2.40	840.00
February 15, 2024	YCC	Telephone call with Flathead County, MT taxing authority re: delinquent taxes on Montana real property; email re: same (.2).	0.20	30.00
February 15, 2024	RN	Reviewing Google Workspace for insurance documents for Stewart Grove and Urbin MB properties. Putting together list of professionals. Email communication to Insurance Agent re: same. Call with M. Sanchez from Orange Insurance re: property policies. Call with B. Lee and D. Rosendorf re: document requests and review same. Confer with F. St. Remy re: loading documents to Relativity.	5.90	1,770.00

Date	Code	Description	Hours	Amount
		Email communication with MSP4 company re: data set. Call with Clay Crandall from Virtuworks re: moving server to KTT offices and processing documents for loading to Relativity.		
February 15, 2024	YCC	Meet and confer with F. St. Remy and vendor re: options for large volume of data from server (.5).	0.50	75.00
February 15, 2024	BJW	Call with Ms. Lee, Mr. Rosendorf, and [REDACTED] and [REDACTED] (.4); follow on email correspondence regarding the case with [REDACTED] (.3)	0.70	245.00
February 15, 2024	DLR	Receive and review unopposed motion to strike R. Kapoor and Patriots affirmative defenses (.1); receive and review J. Alderman message to courtroom deputy re Urbin Miami Beach action and stay and further messages re same (.2)	0.30	105.00
February 16, 2024	YCC	Review and analyze mail from Coral Gables property (.4).	0.40	60.00
February 16, 2024	RN	Reviewing Google Workspace documents on properties in Coconut Grove and Miami Beach. Working on list of professionals. Reviewing insurance policies provided by Orange Insurance.	5.20	1,560.00
February 16, 2024	DLR	Receive and review order granting motion to strike defenses (.1); confer and exchange messages with state court counsel re stay and cancellation of hearings (.3); receive and review notice of filing receivership order in state court case (.1)	0.50	175.00
February 16, 2024	DLR	Exchange messages with B. Lee re Receiver initial disclosures (.2); confer with forensic accountants re properties and information re same, and further follow up re same (1.0); receive and review several messages re Quickbooks access (.2).	1.20	420.00
February 19, 2024	DLR	Receive and review SEC draft motion to compel sworn accounting	0.80	280.00

		and exchange messages re same (.3); review draft initial disclosures and exchange messages with B. Lee re same (.3); review revised initial disclosures (.2)		
February 19, 2024	YCC	Update cast of characters to include secured UCC parties (.3).	0.30	45.00
February 19, 2024	YCC	Review and analyze February and March 2024 payoff amounts for 2022/2023 real estate taxes on Montana property and consider payment of same (.2).	0.20	30.00
February 19, 2024	YCC	Update master litigation spreadsheet (.2).	0.20	30.00
February 19, 2024	RN	Confer with F. St. Remy re: transfer of Google Workspace documents to Relativity for review.	0.20	60.00
February 19, 2024	DLR	Review correspondence and information from Chicago Title re escrow deposits and confer with B. Lee re same (.4); further consider initial disclosures and exchange messages with B. Lee re same (.2); receive and review several more messages re Quickbooks access (.2)	0.80	280.00
February 20, 2024	YCC	Follow up on payment of real estate taxes due on Montana property (.2); email with taxing authorities re: same (.1).	0.30	45.00
February 20, 2024	RN	Searching Google Workspace site for LV entities tax returns. Reviewing tax returns and related documents. Email communication to Receiver summarizing tax returns found in Workspace. Confer with F. St. Remy re: loading data from Workspace to Relativity and cost of same. Email communication to Receiver re: same. Researching entities related to LV on Sunbiz corporate filings. Drafting list of related entities - send same to Receiver.	5.80	1,740.00
February 20, 2024	FSR	Attention to, and prepare cost analysis to process custodian PSTs and server drives (.90) email exchange and interoffice	1.10	165.00

		discussions with Mr. Neary re: same (.20)		
February 20, 2024	DLR	Receive and review R. O'Brien message to F. Schwartz re SEC motion to compel compliance with order requiring sworn accounting and review several further messages re same (.4); finalize Receiver initial disclosures (.1); receive and review Kapoor initial disclosures (.2); exchange messages with B. Lee re same (.2); receive and review SEC initial disclosures (.2); review messages re extension of time for Receiver to respond to SEC complaint (.1); Confer with counsel re state court action, applicability of receivership stay, receive and review communication to court re same and draft message re same (.4)	1.60	560.00
February 20, 2024	DLR	Further review documents from Miami Beach unit purchaser and follow up re same (.3)	0.30	105.00
February 21, 2024	DAS	Review exchange of correspondence and with judicial chambers regarding orders/notices being considered and parties' positions, and confirming this week's hearings I was handling for the receivership estate would be canceled (.1)	0.10	35.00
February 21, 2024	DLR	Review several further messages re Kapoor sworn accounting and motion to compel (.3); receive and review Kapoor accounting (.3); consider and analyze bank statement showing Puerto Rico bank account, confer with B. Lee and R. O'Brien re same (.8); exchange messages with F. Schwartz re motion to continue asset freeze hearing (.1); Receive and review unopposed motion to correct asset freeze order and exchange messages re same (.2);	1.70	595.00
February 21, 2024	DLR	Exchange further messages re cancellation of state court hearing	0.30	105.00

Date	Attorney	Description	Hours	Amount
February 22, 2024	DLR	Receive and review communications with Chicago Title counsel re escrow deposits and documentation re same (.3)	0.30	105.00
February 22, 2024	DLR	Receive and review Kapoor sworn accounting (.3); Receive and review Kapoor motion for continuance of asset freeze hearing (.3); Exchange several messages re Kapoor motion to continue asset freeze hearing and argumentative provisions of motion (.7); draft response to Kapoor motion to continue hearing (.2); receive and review SEC response to Kapoor motion to continue hearing (.2); further review and analyze Kapoor attachments to motion to continue re purported capital contribution (.8); continued review and analysis of documents and communications re same (.8)	3.30	1,155.00
February 23, 2024	YCC	Review and analyze Shared Drive; email to B. Lee re: sample screenshots (.2).	0.20	30.00
February 23, 2024	YCC	Review and analyze LV/Urbin tax returns and circulate same to various parties (.2); review and analyze more tax documents for FL Dept. of Revenue and circulate to various parties (.2).	0.40	60.00
February 23, 2024	YCC	Review and analyze LV Miami Beach customer deposits and escrow and circulate same to various parties (.3); review and analyze LV Commodore customer deposits and escrow and circulate same to various parties (.2).	0.50	75.00
February 23, 2024	DAS	Follow up with counsel as to next week's hearings and filings being prepared to confirm such state court proceedings stayed; receive and review later submitted correspondence and pleadings requesting such state court hearings (case management conference) be canceled (.1)	0.10	35.00

February 23, 2024	FSR	Receive, analyze, and prepare documents related to customer deposits for organization and review (.20); analyze, and prepare documents related to lender for organization and review (.20); email exchange with Ms. Lee re: same (.20)	0.60	90.00
February 23, 2024	DLR	Receive and review coverage determination letter re Commodore condo association and exchange messages with B. Lee re same (.3); exchange messages re Miami Beach customer deposits and escrows (.3)	0.60	210.00
February 23, 2024	DLR	Receive and review Kapoor reply re motion to continue (.2); receive and review order granting motion to continue (.1); receive and review F. Schwartz message and draft motion for clarification re stay and yacht action (.3)	0.60	210.00
February 26, 2024	YCC	Review and update cast of characters for service relating to purchase sale agreements of Urbin Miami Beach condos (1.6).	1.60	240.00
February 26, 2024	RN	Reviewing Google Workspace re: searching for tax returns; professionals; financial documents; insurance. Call with MSP4 and Virtuworks re: options for data back-up and storage.	5.20	1,560.00
February 26, 2024	DLR	Receive and review J. Alderman Notice of Appearance in receivership action (.1); receive and review Kapoor answer and affirmative defenses to complaint (.3); receive and review SEC subpoena of B. Kapoor (.1); receive and review Kapoor motion for clarification re asset freeze order and receivership stay (.3); confer with B. Lee re Receiver obligations under sworn accounting and follow up with SEC counsel re same (.4); receive and review several messages re subpoena of B. Kapoor for asset freeze hearing (.3); Further review Kapoor motion	3.00	1,050.00

		for clarification re yacht case and review yacht case docket re same (.9); Confer with B. Lee re yacht case and motion for clarification (.5); receive and review message re cancellation of hearing in Mironest case (.1);		
February 26, 2024	YCC	Email exchange with Receiver re: Shared drive screenshots (.2).	0.20	30.00
February 27, 2024	DAS	Review certain recent pleadings, dockets and orders to determine status and pending items in upcoming state court matters involving receivership entities and associated parties (.4)	0.40	140.00
February 27, 2024	DLR	Receive and review order granting motion for clarification and exchange messages with B. Lee re same (.3); receive and review messages re subpoena of B. Kapoor (.2)	0.50	175.00
February 28, 2024	DAS	Review pair of new litigation complaints involving 1234 Washington alleging pre-receivership fraud by Mr. Kapoor and Urbin Miami Beach entity he controlled (.4)	0.40	140.00
February 28, 2024	DLR	Review complaints filed by Miami Beach customer depositors and exchange messages with B. Lee re same (.4); draft message to J. Tome re Order Appointing Receiver and stay (.2); confer with J. Tome re same (.4); receive and review demand letter re Urbin Miami Beach purchase contract, confer with B. Lee re same and respond to counsel re same (.4)	1.40	490.00
February 28, 2024	DLR	Further review message from Chicago Title counsel re information which may be disclosed re escrow deposits and exchange messages with B. Lee re same (.3); receive and review messages from P. Gallinar re tax returns and related communications and further exchange messages re same (.3)	0.60	210.00

February 28, 2024	YCC	Emails re: call from Asset Recovery Services re: printer; telephone call to Asset Recovery Services and left message (.2).	0.20	30.00
February 28, 2024	RN	Email communication to accountants used by Receivership entities re: tax returns. Searching Google Workspace re: Kapoor bank accounts; professionals; insurance; and tax returns. Research on Google Vault capabilities - running Google Vault searches.	4.60	1,380.00
February 29, 2024	YCC	Follow up on meeting re: computer equipment at Coral Gables property (.1).	0.10	15.00
February 29, 2024	RN	Call with B. Lee and SEC counsel. Confer with F. St. Remy re: Download of data from Teamwork Project Mgmt. Site. Email communication with B. Lee re: Google Workspace searches and Teamworks invoices.	0.80	240.00
February 29, 2024	FSR	Attend meet-and-confer with SEC and Receiver re: discovery (.80); interoffice discussion with Mr. Neary re: same (.10)	0.90	135.00
March 1, 2024	YCC	Email exchange re: coordinating pickup of leased printer (.2); confer with R. Neary re: same (.1).	0.30	45.00
March 1, 2024	YCC	Review and analyze shared Google drive for inventory of same (1.1).	1.10	165.00
March 1, 2024	RN	Confer with Y. Castro re: returning leased printer in Forum offices. Searching Google Workspace for Receivership entities' tax returns. Email communication to pre-receivership accountants re: same.	2.10	630.00
March 1, 2024	DLR	Review F. Schwartz message re Quickbooks access (.1);	0.10	35.00
March 4, 2024	RN	Call with pre-receivership accountants re: retrieving tax forms and financial documents. (.5) Attending call with Receiver, SEC, and Kapoor's counsel. (.7) Attending call with Location	1.50	450.00

Date	Code	Description	Hours	Amount
March 4, 2024	DLR	Ventures former IT chief re: Google Vault searches. (.3) Prepare for and participate in call with SEC counsel and R. Kapoor counsel re ESI and document production issues (.7)	0.70	245.00
March 5, 2024	DLR	Confer with counsel for Miami Beach unit purchaser re deposit claims (.3)	0.30	105.00
March 5, 2024	DLR	Confer with process server re attempt to serve complaint (.1); confer with B. Lee re same (.1); receive and review Woodforest Complaint (.3); draft message to Woodforest counsel re Order Appointing Receiver and stay (.4); confer with S. Silver re same (.3)	1.20	420.00
March 5, 2024	RN	Phone call and email communication with M. Sanchez, insurance agent for Location Ventures and related entities, re: search for insurance policies for Urbin Commodore Restaurant SPE and Urbin Commodore SPE. Reviewing insurance policies for same. (.5) Email communication with accountants re: retrieving tax forms and other financial documents. (.1)	0.60	180.00
March 5, 2024	DAS	Follow up as to upcoming hearings, cancellation of certain matters pending new judicial assignment, and discuss with counsel various pending items, draft pleadings and discussions with lender, litigation parties and others (.3)	0.30	105.00
March 5, 2024	YCC	Review and update cast of characters to include secured parties (.4).	0.40	60.00
March 6, 2024	YCC	Review and analyze two new lawsuits relating to Miami Beach property and update cast of characters to add customers with deposits and creditor for Stewart Grove (.5).	0.50	75.00
March 6, 2024	YCC	Email exchange with Asset Recovery Services re: printer at 299	0.30	45.00

		Alhambra property and provide photos of same (.3).		
March 6, 2024	YCC	Follow up on payment of taxes on Montana property and taxes for second half of 2023; forward to B. Lee re: same (.2).	0.20	30.00
March 6, 2024	DAS	Follow up with Receiver as to pending negotiations and pleadings in Los Pinos residence matter and discuss upcoming state court hearing; also touch on upcoming call as to latest developments; review draft response pleading to be filed (.4)	0.40	140.00
March 6, 2024	RN	Phone call with printer leasing company re: retrieval of printer.	0.20	60.00
March 7, 2024	RN	Phone call and email communication with Orange Insurance Agent re: securing insurance on Commodore property. (.3) Reviewing new policy quote (.2) Phone call with B. Lee re: insurance quotes. (.1) Research on price increase for Google Workspace - email communication with B. Lee re: same. (.6)	1.20	360.00
March 7, 2024	YCC	Review and analyze purchase agreement and add unit owner to cast of characters (.2).	0.20	30.00
March 8, 2024	YCC	Review, analyze and process B. Goodkind files and circulate to accountants (.3).	0.30	45.00
March 8, 2024	RN	Searches in Google Workspace for Kapoor bank statements, Essenys company, insurance policies and other related materials. Reviewing list of bank accounts from Accountants and running searches of account numbers.	5.60	1,680.00
March 11, 2024	YCC	Review and analyze zip file from Goodkind Florio (.2).	0.20	30.00
March 11, 2024	RN	Reviewing documents provided by pre-receiver accounting firm.	1.00	300.00
March 11, 2024	YCC	Telephone call with courier re: pickup of printer at 299 Alhambra property; email re: same and confer with R. Neary (.2).	0.20	30.00

March 12, 2024	YCC	Review and analyze LV and Urbin payroll and tax documents from pre-receivership accounting firm (.3).	0.30	45.00
March 12, 2024	YCC	Organize and review physical files and personal property in storage room (.2).	0.20	30.00
March 12, 2024	YCC	Telephone call with carrier re: pickup of printer at 299 Alhambra (.1); attention to turnover of printer to carrier at 299 Alhambra office building (1.2).	1.30	195.00
March 12, 2024	RN	Organize and review physical files and personal property in storage room	0.20	60.00
March 13, 2024	RN	Searches of Google Workspace re: determining owners and account numbers for bank accounts.	1.50	450.00
March 14, 2024	DAS	Review updated litigation chart as to status and developments in batch of pending/stayed state court matters, and note upcoming hearings and other deadlines (.2)	0.20	70.00
March 14, 2024	YCC	Review and analyze Google shared drive files for inventory of same (1.1).	1.10	165.00
March 14, 2024	RN	Researching Google Workspace and levels of user's access. Call with Clay Crandall from Virtuworks re: reviewing Google Workspace and Vault attributes. Research on entities' bank statements. Confer with F. St. Remy re: Teamworks archive.	2.60	780.00
March 14, 2024	RCP	Check case dockets for all pending cases; update list accordingly (stays; upcoming hearings and/or cancellations); update calendar to reflect any cancellations; circulate updated list; update SunBiz Chart (1.5).	1.50	225.00
March 14, 2024	FSR	Review and investigation on Teamwork to determine most effective method to preserve and archive database projects and prepare Projects Report of Archived and Active (1.7); email exchange	2.40	360.00

Date	Initials	Description	Hours	Amount
		with Mr. Neary and Mr. Crandall, planning and discussion of migrating data to Microsoft Project (.70)		
March 15, 2024	YCC	Review and analyze Google shared drive files for inventory of same (1.7).	1.70	255.00
March 15, 2024	LXS	Review email production and provide tax related documents to Receiver.	0.60	150.00
March 15, 2024	BJW	Call with Ms. Lee and [REDACTED] regarding document requests.	0.30	105.00
March 15, 2024	RN	Email communication with Virtuworks rep. re: exporting emails from Google Vault. Research on Google Vault capabilities. Email communication with F. St. Remy and Virtuworks rep re: Options for shutting down Teamworks site. Confer with B. Lee re: production of documents to parties in SEC action.	2.20	660.00
March 15, 2024	FSR	Multiple emails with Mr. Neary and Mr. Crandall, planning and discussion of migrating Teamwork data	0.50	75.00
March 17, 2024	LXS	Review email production and provide tax related documents to Receiver.	1.10	275.00
March 18, 2024	LXS	Review email production and provide tax related documents to Receiver.	3.30	825.00
March 18, 2024	DLR	Telephone conference with B. Lee re several outstanding matters and follow up re same (.8)	0.80	280.00
March 18, 2024	FSR	Interoffice meet-and-confer with Mr. Neary, planning and discussion of the most effective method for ESI collection	0.30	45.00
March 18, 2024	RN	Reviewing and researching features of Google Workspace and Google Vault re: plan for search and production of documents to SEC and Kapoor's counsel. Confer with F. St. Remy re: same. Confer with B. Lee re: same.	6.90	2,070.00

March 18, 2024	YCC	Review and analyze Google shared drive files for inventory of same (3.2).	3.20	480.00
March 18, 2024	DLR	Receive and review notice of hearing in Mironest action and exchange several messages re status of stay and order recognizing same (.4)	0.40	140.00
March 19, 2024	YCC	Review and analyze pending motions and proposed orders in preparation for status conference (.2).	0.20	30.00
March 19, 2024	RN	Google vault searches for bank accounts, tax forms, and information on Montana property. Research on Google Vault capabilities re: proposed search plan to SEC and Kapoor counsel. Attending call with SEC re: Google Workspace and Vault searches. Attending call with Receiver, SEC, and Kapoor counsel re: document searching in Google Workspace and Vault. Confer with F. St. Remy re: exporting documents from Google Vault.	3.80	1,140.00
March 19, 2024	FSR	Attend meet-and-confer with Mr. Neary, Ms. Lee, and SEC, planning and discussion of strategy to collect ESI (.80); review and prepare sample metadata export (.30); attend meet-and-confer with Lee; Mr. Schwartz, Ms. Raskin; Mr. Russell, Mr. Rosendorf; and Mr. Neary address outstanding issues regarding ESI (.70)	1.80	270.00
March 19, 2024	DLR	Conference call with R. O'Brien, B. Lee, R. Neary, F. Saint-Remy re ESI production issues (.6); conference with Kapoor counsel and SEC counsel to discuss ESI production issues (.6)	1.20	420.00
March 19, 2024	YCC	Attention to address change with taxing authorities for Montana property in Flathead County (.1).	0.10	15.00
March 19, 2024	YCC	Review and analyze corporate online filings with Florida Division of Corporations for LV Montana Phase	0.30	45.00

Date	Category	Description	Hours	Amount
March 19, 2024	YCC	Review demand letters for return of deposit for Miami Beach units and update cast of characters spreadsheet (.1).	0.10	15.00
March 19, 2024	YCC	Review and finalize inventory for Google shared drive files (.3).	0.30	45.00
March 19, 2024	DLR	Confer with B. Lee re Stewart contract, Commodore analysis and negotiations, URBIN Miami Beach NDA, document production and preparation for status conference (.6); receive and review email from B. Lee re status of real properties for discussion at status conference and further consideration preparation for status conference (.4)	1.00	350.00
March 20, 2024	YCC	Review and update cast of characters to add investor contact for Urbin Coconut Grove (.1).	0.10	15.00
March 20, 2024	YCC	Review and analyze mail from 299 Alhambra Circle for change of address (.4).	0.40	60.00
March 20, 2024	DAS	Assist Receivership team with matters to be presented at tomorrow's comprehensive status conference in SEC Receivership proceedings, as well as discuss legal issues raised in indemnification motion to advance litigation costs (.4); review and consider indemnification motion and memorandum of law for advancement of litigation costs (.2); review draft of extensive outline presentation of properties, pending matters and litigation for status conference presentation by receivership team (.4)	1.00	350.00
March 20, 2024	DLR	Review all pending matters and motions (2.2); prepare outline for status conference (2.5); review B. Lee comments re same and update outline (.3); receive and review K. Florio letter re escrow agent	5.40	1,890.00

Date	Code	Description	Hours	Rate
		resignation and exchange messages with B. Lee re same, further analysis re same (.4)		
March 21, 2024	YCC	Review and analyze inventory of Google share drive for certain documents relating to deposits (.1).	0.10	15.00
March 21, 2024	DLR	Exchange messages with counsel re Mironest action and order recognizing stay (.2); Receive and review message from counsel re J&P / Gronlier action and status of stay (.2)	0.40	140.00
March 21, 2024	RN	Confer with F. St. Remy re: closing Teamworks account. Email communication with B. Lee re: same. Confer with B. Lee re: searches in Shared Drives to pull information for Appraiser for Commodore plaza properties.	0.50	150.00
March 21, 2024	DLR	Prepare for status conference (1.0); attend status conference and confer with parties (1.5)	2.50	875.00
March 22, 2024	FSR	Attention to, review, and analysis of Teamwork project workflow to compile materials relevant to Commodore projects (5.7); interoffice discussions with Mr. Neary re: same (.20)	5.90	885.00
March 22, 2024	DLR	Respond to A. Bousalis re status of receivership stay in Gronlier / J&P Tiles action (.3)	0.30	105.00
March 25, 2024	YCC	Review and analyze list of parties served with Receivership order; prepare letter to Dharma Studios enclosing same (.2).	0.20	30.00
March 26, 2024	DLR	Confer with B. Lee and R. O'Brien re Los Pinos bankruptcy, Commodore property, discovery issues (1.0)	1.00	350.00
March 26, 2024	DLR	Exchange messages with B. Lee and follow up re entry of order recognizing stay in Mironest case (.2)	0.20	70.00
March 27, 2024	RN	Confer with F. St. Remy re: shutting down Teamworks site and archiving information. Email communication with Virtuworks IT re: Teamworks	0.50	150.00

		site. Email communication to B. Lee re: update of same.		
March 27, 2024	FSR	Attention to, and investigate options to minimize cost of Teamwork (.30); interoffice discussion with Mr. Neary regarding same (.10)	0.40	60.00
March 27, 2024	DLR	Receive and review S. Ferrera message and draft letter to GF re escrow agent attempted resignation (.3)	0.30	105.00
March 28, 2024	YCC	Emails re: leased printer at 299 Alhambra property and provide photos of same (.1).	0.10	15.00
March 29, 2024	RN	Searching Google Workspace/Vault for [REDACTED] for documents.	2.20	660.00
March 29, 2024	DLR	Confer with B. Lee re Los Pinos bankruptcy, Miami Beach customer deposits, Commodore lease, Kapoor motion for advancement of fees (.5); exchange messages and confer with B. Lee re Goodkind Florio escrow agent resignation (.3); call with J. Tome and B. Lee re Miami Beach unit owner deposit claims and bond issues and further follow up re same (.5)	1.30	455.00
Total for CASE ADMINISTRATION			----- 261.30	72,700.00

CLAIMS ADMINISTRATION AND OBJECTIONS

February 9, 2024	DLR	Participate in conference with 515 Valencia unit purchaser re information on Valencia and potential recoveries (1.5).	1.50	525.00
February 16, 2024	DLR	Participate in conference call with counsel re potential investor claims relating to receivership and follow up re same (.4).	0.40	140.00
February 18, 2024	DLR	Receive and review documents from Miami Beach unit purchaser (.3)	0.30	105.00

Total for CLAIMS ADMINISTRATION AND OBJECTIONS			2.20	770.00

EMPLOYMENT APPLICATIONS (PROFESSIONALS)

January 16, 2024	YCC	Prepare draft motion and proposed order to employ KTT as counsel for receiver (1.0).	1.00	150.00
January 17, 2024	YCC	Prepare motion to employ Maria Yip and Yip Associates as forensic accountants and proposed order (.9); prepare exhibits to motion to employ Kozyak Tropin & Throckmorton as counsel for receiver; finalize and file same along with submission of proposed order (.9).	1.80	270.00
January 17, 2024	DLR	Receive and review messages re Receiver's motion to employ counsel (.1).	0.10	35.00
January 18, 2024	DLR	Exchange messages and confer with B. Lee re employment of forensic accountant (.3).	0.30	105.00
January 19, 2024	YCC	Prepare exhibits to motion to employ Yip Associates as forensic accountants for receiver; finalize and file same along with submission of proposed order (.5).	0.50	75.00
March 7, 2024	YCC	Review and revise motion for authorization to employ S. Ferrera and assemble exhibits; file motion and submit proposed order (.7).	0.70	105.00
March 19, 2024	YCC	Review and revise motion to employ real estate appraiser for Commodore Properties, proposed order and assemble exhibits to same (.7); finalize and file same including submission of proposed order (.6).	1.30	195.00
March 29, 2024	DLR	Exchange messages and preliminary review of motion to employ auctioneer for Miami Beach (.2); confer with B. Lee re motion to employ auctioneer (.2)	0.40	140.00
Total for EMPLOYMENT APPLICATIONS (PROFESSIONALS)			6.10	1,075.00

EXHIBIT C

YIP ASSOCIATES' TIME ENTRIES



FORENSIC ACCOUNTING +
FINANCIAL INVESTIGATIONS

INVOICE SUMMARY OF PROFESSIONALS

Bernice C. Lee, Receiver
Kozyak Tropin & Throckmorton, P.A.
2525 Ponce de Leon Blvd.,
9th Floor
Miami FL 33134

Invoice Number: 32356
Date: April 8, 2024
Matter ID: 151.0001

Re: Location Ventures, LLC.
Case No. 23-24903-CIV-ALTONAGA

For Professional Services Rendered January 12, 2024 through March 31, 2024

Professional	Initials	Position	Experience	Hours	Rate	Fees
Maria M. Yip, CPA, CFE, CFF, CIRA	MMY	Partner	30 Years	10.8	\$350	\$ 3,780.00
Hylton Wynick, CIRA, CRFAC	HW	Partner	39 Years	5.0	\$350	\$ 1,750.00
Kerry-Ann M. Rin, CPA, CIRA	KMR	Partner	20 Years	209.3	\$350	\$ 73,255.00
Kit R. Becker, CPA/CFF, CIRA	KRB	Director	43 Years	2.8	\$300	\$ 840.00
Danny D. Zamorano, CPA, CFE	DDZ	Manager	8 Years	160.7	\$300	\$ 48,210.00
Christopher M. Vatti	CMV	Manager	7 Years	156.8	\$300	\$ 47,040.00
Susan Y. Tai	SYT	Sr. Associate	7 Years	55.2	\$250	\$ 13,800.00
Anthony Yip	AY	Associate	3 Years	35.0	\$250	\$ 8,750.00
Patrick J. Martin	PM	Associate	5 Years	9.4	\$250	\$ 2,350.00
Pamela Chuy	PC	Sr. Associate at Paraprofessional rate	13 Years	0.4	\$150	\$ 60.00
Richard Diaz	RD	Sr. Associate at Paraprofessional rate	16 Years	22.1	\$150	\$ 3,315.00
Blended Average Hourly Rate:					\$304	
Total Fees:				667.5		\$ 203,150.00
Total Expenses						\$ 155.07
Total Amount Due						\$ 203,305.07



YIP ASSOCIATES

FORENSIC ACCOUNTING +
FINANCIAL INVESTIGATIONS

INVOICE DETAIL

Bernice C. Lee, Receiver
 Kozyak Tropin & Throckmorton, P.A.
 2525 Ponce de Leon Blvd.,
 9th Floor
 Miami FL 33134

Invoice Number: 32356
 Date: April 8, 2024
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Date	Initials	Description	Hours	Rate	Amount
01/14/24	MMY	Telephone conversation with B. Lee re: background on receivership.	0.7	\$350	\$ 245.00
01/15/24	MMY	Interviewed R. Gonzalez (IT) and Virginia.	5.0	\$350	\$ 1,750.00
01/17/24	MMY	Meeting with KMR, RD, and PC re: on-site visit (.4); meeting with B. Lee, D. Rosendorf, J. Chirinos and KMR re: background on financial function (2.0); discussion with DDZ re: QuickBooks (.2).	2.6	\$350	\$ 910.00
01/17/24	KMR	Reviewed pleadings and motions (.3); meeting with MMY, RD, and PC re: on-site visit (.4); meeting with MMY, B. Lee, D. Rosendorf and J. Chirinos re: background on financial function (2.0).	2.7	\$350	\$ 945.00
01/17/24	DDZ	Discussion with MMY re: QuickBooks (.2); reviewed QuickBooks exports (.4).	0.6	\$300	\$ 180.00
01/17/24	RD	Meeting with MMY, KMR, and PC re: on-site visit.	0.4	\$150	\$ 60.00
01/17/24	PC	Meeting with MMY, KMR, and RD re: on-site visit.	0.4	\$150	\$ 60.00
01/18/24	MMY	On-site review and gathering of documentation; telephone conversations with B. Lee re: same.	1.0	\$350	\$ 350.00
01/18/24	KMR	On-site review and gathering of documentation.	3.0	\$350	\$ 1,050.00
01/18/24	DDZ	Researched Sage Intacct and QuickBooks Online methodology for exporting accounting activity and provided R. Gonzalez with instructions to perform exports.	1.4	\$300	\$ 420.00



YIP ASSOCIATES

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Date	Initials	Description	Hours	Rate	Amount
01/18/24	RD	On-site review and gathering of documentation.	3.0	\$150	\$ 450.00
01/21/24	KMR	Various communications with R. Gonzalez re: coordinating on-site visit (.1); various communications with Modesto re: on-site visit (.1).	0.2	\$350	\$ 70.00
01/22/24	KMR	On-site review and gathering of documentation.	9.7	\$350	\$ 3,395.00
01/22/24	RD	On-site review and gathering of documentation.	9.7	\$150	\$ 1,455.00
01/23/24	KMR	On-site review and gathering of documentation; various telephone conversations with B. Lee re: Forum tenants and former employee.	9.2	\$350	\$ 3,220.00
01/23/24	DDZ	Reviewed and exported monthly financial statements, general ledgers, and other accounting records from Sage Intacct accounting software utilized by the receivership entities, for the years of 2017 through 2023.	7.8	\$300	\$ 2,340.00
01/23/24	RD	On-site review and gathering of documentation.	9.0	\$150	\$ 1,350.00
01/24/24	DDZ	Continued to review and export monthly financial statements, general ledgers, and other accounting records from Sage Intacct accounting software utilized by the receivership entities, for the years of 2017 through 2023.	1.0	\$300	\$ 300.00
01/25/24	MMY	Meeting with R. O'Brien, B. Lee, M. Davis, R. Weiss, and DDZ re: source documents.	1.0	\$350	\$ 350.00
01/25/24	CMV	Reviewed and exported monthly financial statements, general ledgers, and other accounting records from QuickBooks Online accounting software utilized by the receivership entities, for the years of 2016 through 2023 (2.9); discussions with DDZ re: QuickBooks exports (.4); updated financial documentation index (.5).	3.8	\$300	\$ 1,140.00



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Date	Initials	Description	Hours	Rate	Amount
01/25/24	DDZ	Continued to review and export monthly financial statements, general ledgers, and other accounting records from Sage Intacct accounting software utilized by the receivership entities, for the years of 2017 through 2023. (6.4); discussions with CMV re: QuickBooks exports (.4); meeting with R. O'Brien, B. Lee, M. Davis, R. Weiss, and MMY re: source documents (1.0).	7.8	\$300	\$ 2,340.00
01/26/24	MMY	Telephone conversation with B. Lee re: Qualified Settlement Fund.	0.2	\$350	\$ 70.00
01/26/24	KMR	Prepared inventory list of documents obtained from 275 Alhambra Circle and 299 Alhambra Circle.	0.3	\$350	\$ 105.00
01/26/24	CMV	Discussion with DDZ re: QuickBooks exports (.2); exported financial data from QuickBooks (.3); discussion with DDZ re: payroll (.3).	0.8	\$300	\$ 240.00
01/26/24	DDZ	Discussion with CMV re: QuickBooks exports (.2); discussion with CMV re: payroll (.3); reviewed accounting data and bank records (2.8); call with Receiver re: accounting software utilized by Receivership entities (.3).	3.6	\$300	\$ 1,080.00
01/29/24	KMR	Prepared inventory list of documents obtained from 275 Alhambra Circle and 299 Alhambra Circle.	0.2	\$350	\$ 70.00
01/29/24	DDZ	Reviewed and analyzed bank records for the receivership entities.	6.8	\$300	\$ 2,040.00
01/30/24	KMR	Communication with B. Lee (.1); various discussions with DDZ re: next steps (.6).	0.7	\$350	\$ 245.00
01/30/24	CMV	Discussion with DDZ re: work to be performed (.5); organized documents received (2.1).	2.6	\$300	\$ 780.00
01/30/24	DDZ	Discussions with KMR re: next steps (.6); reviewed and analyzed bank activity of the receivership entities (5.2); discussion with CMV re: work to be performed (.5).	6.3	\$300	\$ 1,890.00



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Date	Initials	Description	Hours	Rate	Amount
02/01/24	CMV	Discussion with DDZ re: bank analysis (.6); updated bank matrix (1.2).	1.8	\$300	\$ 540.00
02/01/24	DDZ	Discussions with CMV re: bank analysis (.6); communications with Regis HR re: preparation of 2023 Form W-2 (.2); reviewed bank records received (2.1).	2.9	\$300	\$ 870.00
02/02/24	MMY	Discussion with KMR and DDZ re: bank records.	0.3	\$350	\$ 105.00
02/02/24	KMR	Meeting with B. Lee and DDZ re: next steps (.5); gathered and reviewed bank documents obtained on-site (3.1); discussion with DDZ and MMY re: bank records (.3); discussion with DDZ and CMV re: bank analysis (.7).	4.6	\$350	\$ 1,610.00
02/02/24	CMV	Discussion with KMR and DDZ re: bank analysis (.7); processed and analyzed bank statements using CFIS (4.9).	5.6	\$300	\$ 1,680.00
02/02/24	DDZ	Review and analysis of bank records (1.8); meeting with KMR and Receiver re: next steps (.5); discussion with KMR and MMY re: bank records (.3); discussion with KMR and CMV re: bank analysis (.7); preparation of document request (1.1); communications with R. Gonzalez (.1); reviewed documents produced by Kapila Mukamal (.8).	5.3	\$300	\$ 1,590.00
02/04/24	CMV	Processed and analyzed bank statements using CFIS.	5.7	\$300	\$ 1,710.00
02/05/24	KMR	Various discussions with SYT re: work to be performed (.3); discussion with CMV re: bank analysis (.1); gathered and reviewed bank documents obtained on-site (6.8).	7.2	\$350	\$ 2,520.00
02/05/24	CMV	Updated bank matrix (2.6); continued to processing bank statements using CFIS (.7); prepared bank analysis (1.4); discussion with DDZ re: bank analysis (.5); analyzed supporting transaction information for Bank of America accounts and updated bank analysis (2.2); discussion with KMR re: bank analysis (.1).	7.5	\$300	\$ 2,250.00



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Date	Initials	Description	Hours	Rate	Amount
02/05/24	DDZ	Preparation of document request (3.2); discussion with CMV re: bank analysis (.5); reviewed and analyzed bank activity (1.8).	5.5	\$300	\$ 1,650.00
02/05/24	SYT	Various discussions with KMR re: work to be performed (.3); prepared bank analysis for Woodforest National Bank account including analyzing supporting transaction information (8.6).	8.9	\$250	\$ 2,225.00
02/06/24	HW	Plan and prepare for meeting with Receiver and KRB.	2.1	\$350	\$ 735.00
02/06/24	KMR	Reviewed bank documents obtained-on site including scanning and updating bank matrix (7.2); reviewed document request prepared by DDZ (.3); various discussions with SYT re: status and bank analysis (.3); various discussions with PM re: work to be performed (.3); discussion with CMV re: bank matrix (.2).	8.3	\$350	\$ 2,905.00
02/06/24	KRB	Meeting with B. Lee and HW re: case.	0.8	\$300	\$ 240.00
02/06/24	CMV	Discussion with KMR re: bank matrix (.2); updated bank matrix (.2); analyzed supporting transaction information for Bank of America accounts and updated bank analysis (7.8).	8.2	\$300	\$ 2,460.00
02/06/24	DDZ	Reviewed and analyzed bank activity (5.7); prepared bank matrix (.4).	6.1	\$300	\$ 1,830.00
02/06/24	PM	Various discussions with KMR re: work to be performed (.3); analyzed supporting transaction information for Woodforest National Bank accounts and updated bank analysis (7.9).	8.2	\$250	\$ 2,050.00
02/06/24	SYT	Various discussions with KMR re: status and bank analysis.	0.3	\$250	\$ 75.00
02/07/24	HW	Various discussions with KMR re: tax returns.	0.1	\$350	\$ 35.00



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Date	Initials	Description	Hours	Rate	Amount
02/07/24	KMR	Reviewed and gathered 2022 tax documents obtained on-site (.9); various discussions with HW re: tax returns (.1); prepared analysis of partners capital accounts (1.6).	2.6	\$350	\$ 910.00
02/07/24	KRB	Reviewed Motion to Appoint Receiver.	0.6	\$300	\$ 180.00
02/07/24	CMV	Discussions with AY re: analyzing supporting transaction information for Bank of America accounts (.4); updated bank matrix (.3); analyzed supporting transaction information for Bank of America accounts and updated bank analysis (4.7).	5.4	\$300	\$ 1,620.00
02/07/24	DDZ	Continued to review and analyze bank activity.	2.4	\$300	\$ 720.00
02/07/24	AY	Discussions with CMV re: analyzing supporting transaction information for Bank of America accounts (.4); analyzed supporting transaction information for Bank of America accounts and updated bank analysis (4.9).	5.3	\$250	\$ 1,325.00
02/08/24	KMR	Updated bank matrix (.3); meeting with DDZ and B. Lee re: document request (.3); discussion with DDZ re: document request and QuickBooks access (.2); various discussions and communications with B. Lee re: QuickBooks Online and Sage Intacct (.2); communication with R. Gonzalez re: QuickBooks (.1); discussion with CMV re: QuickBooks and bank analysis (.2); discussion with SYT re: work to be performed (.2); continued to prepare analysis of partners capital accounts (3.2).	4.7	\$350	\$ 1,645.00
02/08/24	KRB	Reviewed docket and complaint.	1.0	\$300	\$ 300.00
02/08/24	CMV	Continued to analyze supporting transaction information for Bank of America accounts and update bank analysis (7.2); discussion with KMR re: QuickBooks and bank analysis (.2).	7.4	\$300	\$ 2,220.00



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Date	Initials	Description	Hours	Rate	Amount
02/08/24	DDZ	Conference call with Receiver and KMR re: bank accounts (.3); discussions with KMR re: document request and QuickBooks access (.2); prepared summary of QuickBooks and Sage accounts (1.2); prepared document request (3.1); continued to analyze supporting transaction information for Bank of America accounts and update bank analysis. (2.6).	7.4	\$300	\$ 2,220.00
02/08/24	AY	Continued to analyze supporting transaction information for Bank of America accounts and update bank analysis.	6.4	\$250	\$ 1,600.00
02/08/24	SYT	Discussion with KMR re: status updates and next steps analyzing Woodforest National Bank accounts (.2); prepared bank analysis for Woodforest National Bank account including analyzing supporting transaction information (4.7).	4.9	\$250	\$ 1,225.00
02/09/24	KMR	Continued to prepare partners capital analysis (1.2); efforts to update primary user access on nine (9) QuickBooks Online accounts (1.6); reviewed document request prepared by DDZ (.8).	3.6	\$350	\$ 1,260.00
02/09/24	CMV	Assisted with updating primary user on nine (9) QuickBooks Online accounts (4.3); communication with Intuit re: QuickBooks users access (.4).	4.7	\$300	\$ 1,410.00
02/09/24	DDZ	Reviewed and analyzed bank activity (1.4); efforts to replace primary user on nine (9) QuickBooks Online accounts (3.8); prepared bank records	6.2	\$300	\$ 1,860.00
02/09/24	AY	Continued to analyze supporting transaction information for Bank of America accounts and update bank analysis.	1.3	\$250	\$ 325.00
02/09/24	SYT	Continued to analyze supporting transaction information for Woodforest National Bank accounts and update bank analysis.	6.4	\$250	\$ 1,600.00



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For Professional Services Rendered January 12, 2024 through March 31, 2024

Date	Initials	Description	Hours	Rate	Amount
02/12/24	KMR	Reviewed QuickBooks Online accounts (1.2); discussion with DDZ re: QuickBooks Online (.8); various communications with Intuit re: same (.4); various communications with B. Lee and DDZ re: QuickBooks and Sage (.3); various discussions with CMV re: bank analysis and QuickBooks Online (.5); communication with G. Manning re: Sage (.1).	3.3	\$350	\$ 1,155.00
02/12/24	CMV	Discussions with KMR re: Bank of America bank analysis and QuickBooks Online (.5); updated index of QuickBooks/Sage exports (.5); discussion with AY re: supporting transaction information for Bank of America (.2); prepared bank analysis for Bank of America accounts (4.3); discussion with DDZ re: downloading QuickBooks supporting documentation (.3); downloaded and organized invoices, receipts and other supporting documentation from six (6) QuickBooks Online accounts (.9).	6.7	\$300	\$ 2,010.00
02/12/24	DDZ	Discussion with KMR re: QuickBooks online (.8); restored backups of QuickBooks Online (4.5); downloaded invoices, receipts, and other transaction support from three (3) QuickBooks Online accounts (2.6); discussion with CMV re: downloading QuickBooks supporting documentation (.3).	8.2	\$300	\$ 2,460.00
02/12/24	AY	Discussion with CMV re: work to be performed (.2); analyzed supporting transaction information for Bank of America accounts and updated bank analysis (3.4).	3.6	\$250	\$ 900.00
02/13/24	KMR	Correspondence with M. Griffith and K. Lathrop re: Sage (.1); call with B. Lee re: lenders (.4); discussion with CMV re: Bank of America bank analysis (.2); continued to prepare capital partner analysis (3.1); conference call with K. Lathrop and DDZ re: Sage (.2); reviewed documents provided by lender and prepared lender analysis (1.4).	5.4	\$350	\$ 1,890.00



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Date	Initials	Description	Hours	Rate	Amount
02/13/24	CMV	Prepared bank analysis for Bank of America accounts (3.1); discussion with KMR re: bank analysis (.2).	3.3	\$300	\$ 990.00
02/13/24	DDZ	Continued restoring QuickBooks backups (2.8); analyzed operating agreements for the receivership entities (4.2); conference call with K. Lathrop and KMR re: Sage (.2).	7.2	\$300	\$ 2,160.00
02/14/24	KMR	Created user for Sage account and various communications with K. Lathrop (.2); communication with B. Lee re: QuickBooks and Sage (.2); call with R. Penalver re: QuickBooks payments (.2); updated payment information for QuickBooks Online accounts (.5); updated lender analysis (.6).	1.7	\$350	\$ 595.00
02/14/24	CMV	Continued to prepare bank analysis for Bank of America accounts.	2.1	\$300	\$ 630.00
02/14/24	DDZ	Continued to analyze operating agreements for the receivership entities.	7.8	\$300	\$ 2,340.00
02/14/24	PM	Analyzed supporting transaction information for Bank of America accounts and updated bank analysis.	1.2	\$250	\$ 300.00
02/15/24	KMR	Updated QuickBooks Online account users and payment information (1.9); communication with B. Lee re: Intuit payments (.1); reviewed lender documents and prepare lender analysis (5.3).	7.3	\$350	\$ 2,555.00
02/15/24	CMV	Assisted with updating QuickBooks Online account users and payment information.	1.5	\$300	\$ 450.00
02/15/24	DDZ	Assisted with updating QuickBooks Online account users and payment information (.3); analysis of operating agreement for the receivership entities (.5).	0.8	\$300	\$ 240.00



YIP ASSOCIATES

FORENSIC ACCOUNTING +
FINANCIAL INVESTIGATIONS

Invoice Number: 32356

Matter ID: 151.0001

Re: Location Ventures, LLC.
Case No. 23-24903-CIV-ALTONAGA

For Professional Services Rendered January 12, 2024 through March 31, 2024

Date	Initials	Description	Hours	Rate	Amount
02/16/24	KMR	Continued to review lender documents and prepare lender analysis (2.1); meeting with B. Lee, D. Rosendorf and DDZ (1.5); discussion with DDZ re: next steps (.3); prepared schedule of partners for Urbin Coral Gables Partners LLC (.4); various communications and telephone calls with D. Motha re: QuickBooks (.3); reviewed QuickBooks Online accounts (.8).	5.4	\$350	\$ 1,890.00
02/16/24	CMV	Prepared bank analysis for Bank of America accounts (4.5); assisted with updating QuickBooks Online account users and payment information (1.2).	5.7	\$300	\$ 1,710.00
02/16/24	DDZ	Meeting with KMR, Receiver and Receiver's counsel (1.5); discussion KMR re: next steps (.3).	1.8	\$300	\$ 540.00
02/19/24	KMR	Communication with B. Lee re: QuickBooks subscriptions (.3); communication with D. Motha re: QuickBooks access (.3); initial review of QuickBooks Online accounts and updated payment information and users for same (3.9); reviewed lender documents and prepare lender analysis (5.4).	9.9	\$350	\$ 3,465.00
02/19/24	CMV	Assisted with updating payment information and users for eight (8) additional QuickBooks Online accounts (provided by D. Motha).	2.5	\$300	\$ 750.00
02/19/24	SYT	Prepared bank analysis for Bank of America, Woodforest National, and First Citizens bank accounts including analyzing supporting transaction information.	8.3	\$250	\$ 2,075.00
02/20/24	KMR	Performed tracing of funds for lender funds (1.3); meeting with B. Lee and D. Rosendorf (.2); reviewed bank analysis (1.4).	2.9	\$350	\$ 1,015.00
02/20/24	CMV	Prepared bank analysis for Bank of America accounts.	3.4	\$300	\$ 1,020.00



YIP ASSOCIATES

FORENSIC ACCOUNTING +
FINANCIAL INVESTIGATIONS

Invoice Number: 32356

Matter ID: 151.0001

Re: Location Ventures, LLC.
Case No. 23-24903-CIV-ALTONAGA

For Professional Services Rendered January 12, 2024 through March 31, 2024

Date	Initials	Description	Hours	Rate	Amount
02/20/24	SYT	Continued to prepare bank analysis for Bank of America accounts; Woodforest National, and First Citizens bank accounts including analyzing supporting transaction information.	8.6	\$250	\$ 2,150.00
02/21/24	KMR	Reviewed additional documents provided by Receiver (.3); reviewed lender documents and prepared lender analysis (3.1).	3.4	\$350	\$ 1,190.00
02/21/24	CMV	Prepared Bank of America bank analysis.	8.1	\$300	\$ 2,430.00
02/21/24	DDZ	Downloaded monthly financial statements, general ledgers and other accounting records from eight (8) additional QuickBooks Online accounts (provided by D. Motha), for the years 2016 through 2023.	5.2	\$300	\$ 1,560.00
02/21/24	SYT	Continued to prepare bank analysis for Bank of America accounts; Woodforest National, and First Citizens bank accounts including analyzing supporting transaction information.	8.1	\$250	\$ 2,025.00
02/22/24	KMR	Various communications with B. Lee re: Sage, QuickBooks and lenders (.3); prepared lender analysis (1.9); discussion with DDZ and CMV re: bank analysis (.3); communication with K. Lathrop from Sage (.1).	2.6	\$350	\$ 910.00
02/22/24	CMV	Discussions with KMR and DDZ re: bank analysis (.3); prepared bank analysis of Bank of America accounts (5.6).	5.9	\$300	\$ 1,770.00
02/22/24	DDZ	Prepared schedule of lender transactions (2.8); discussion with KMR and CMV re: bank analysis (.3).	3.1	\$300	\$ 930.00
02/22/24	SYT	Continued to prepare bank analysis for Woodforest National bank accounts including analyzing supporting transaction information.	6.6	\$250	\$ 1,650.00
02/23/24	KMR	Discussion with CMV and SYT re: bank analysis (.2); reviewed lender documents and prepared lender analysis (1.7); reviewed customer deposit documents provided by Goodkind & Florio (.2).	2.1	\$350	\$ 735.00



YIP ASSOCIATES

FORENSIC ACCOUNTING +
FINANCIAL INVESTIGATIONS

Invoice Number: 32356

Matter ID: 151.0001

Re: Location Ventures, LLC.
Case No. 23-24903-CIV-ALTONAGA

For Professional Services Rendered January 12, 2024 through March 31, 2024

Date	Initials	Description	Hours	Rate	Amount
02/23/24	CMV	Discussion with KMR and SYT re: bank analysis (.2); prepared bank analysis (9.6).	9.8	\$300	\$ 2,940.00
02/23/24	DDZ	Reviewed and analyzed documents related to Miami Beach project.	3.8	\$300	\$ 1,140.00
02/23/24	SYT	Discussion with KMR and CMV re: bank analysis.	0.2	\$250	\$ 50.00
02/26/24	HW	Reviewed files regarding potential tax matters and discussion with KRB regarding potential tax matters.	2.8	\$350	\$ 980.00
02/26/24	KMR	Reviewed documents provided and prepared analysis of agreements (.7); reviewed lender documents provided and prepared lender analysis (1.9).	2.6	\$350	\$ 910.00
02/26/24	KRB	Discussion with HW regarding potential tax matters.	0.4	\$300	\$ 120.00
02/26/24	CMV	Prepared bank analysis.	8.8	\$300	\$ 2,640.00
02/26/24	DDZ	Reviewed and analyzed loan documents.	3.8	\$300	\$ 1,140.00
02/27/24	KMR	Reviewed lender documents provided and prepared lender analysis.	3.7	\$350	\$ 1,295.00
02/27/24	CMV	Continued to prepare bank analysis.	4.1	\$300	\$ 1,230.00
02/28/24	KMR	Communication with B. Lee re: lenders (.2); reviewed bank activity and QuickBooks for activity for lender funding transactions (1.6); prepared list of bank accounts identified (.2).	2.0	\$350	\$ 700.00
02/28/24	CMV	Continued to prepare bank analysis.	5.8	\$300	\$ 1,740.00
02/29/24	KMR	Communication with B. Lee re: funds from lender (.2); reviewed lender documents provided and prepared lender analysis (7.2).	7.4	\$350	\$ 2,590.00
02/29/24	CMV	Continued to prepare bank analysis.	8.7	\$300	\$ 2,610.00



YIP ASSOCIATES

FORENSIC ACCOUNTING +
FINANCIAL INVESTIGATIONS

Invoice Number: 32356

Matter ID: 151.0001

Re: Location Ventures, LLC.
Case No. 23-24903-CIV-ALTONAGA

For Professional Services Rendered January 12, 2024 through March 31, 2024

Date	Initials	Description	Hours	Rate	Amount
03/01/24	KMR	Telephone call with B. Lee re: QuickBooks users and lenders (.1); downloaded February 2024 Intuit invoices (.1); performed tracing of funds for lender funds (7.4).	7.6	\$350	\$ 2,660.00
03/01/24	CMV	Continued to prepare bank analysis.	5.8	\$300	\$ 1,740.00
03/01/24	DDZ	Performed tracing of funds for lender related transactions.	4.2	\$300	\$ 1,260.00
03/04/24	KMR	Telephone call with B. Lee re: lenders and QuickBooks users (1.1); discussions with SYT re: QuickBooks users (.6); reviewed bank analysis (2.8); telephone call with B. Lee re: projects (.7); reviewed Chicago Title documents and prepared analysis of customer deposits (2.9).	8.1	\$350	\$ 2,835.00
03/04/24	CMV	Prepared list of unknown bank accounts identified.	1.1	\$300	\$ 330.00
03/04/24	SYT	Discussion with KMR re: QuickBooks users (.6); added users to access 16 QuickBooks Online accounts (2.3).	2.9	\$250	\$ 725.00
03/05/24	KMR	Prepared analysis of Commodore customer deposits and performed tracing of funds.	3.8	\$350	\$ 1,330.00
03/05/24	DDZ	Performed tracing of funds for lender related transactions.	6.1	\$300	\$ 1,830.00
03/07/24	KMR	Continued to prepared analysis of Commodore customer deposits and performed tracing of funds (1.8); discussions with CMV re: payments to lenders (.2); discussion with DDZ re: tracing analysis (.3).	2.3	\$350	\$ 805.00
03/07/24	CMV	Discussion with KMR re: payments to lender (.2); prepared analysis of payments to lenders (2.5).	2.7	\$300	\$ 810.00
03/07/24	DDZ	Discussion with KMR re: tracing analysis.	0.3	\$300	\$ 90.00
03/08/24	DDZ	Set-up sharefile and download of records received from Goodkind & Florio.	0.5	\$300	\$ 150.00



YIP ASSOCIATES

FORENSIC ACCOUNTING +
FINANCIAL INVESTIGATIONS

Invoice Number: 32356

Matter ID: 151.0001

Re: Location Ventures, LLC.
Case No. 23-24903-CIV-ALTONAGA

For Professional Services Rendered January 12, 2024 through March 31, 2024

Date	Initials	Description	Hours	Rate	Amount
03/09/24	KMR	Continued to prepare analysis of Commodore customer deposits and performed tracing of funds (1.6); reviewed and analyzed documents received from Goodkind & Florio, P.A (.9); updated lender analysis (1.8).	4.3	\$350	\$ 1,505.00
03/09/24	DDZ	Performed tracing of funds for lender related transactions.	1.3	\$300	\$ 390.00
03/10/24	KMR	Reviewed documents received from Goodkind & Florio, P.A. (1.3); continued to update lender analysis (1.6).	2.9	\$350	\$ 1,015.00
03/10/24	DDZ	Reviewed and analyzed documents received from Goodkind & Florio, P.A.	2.8	\$300	\$ 840.00
03/11/24	KMR	Discussion with DDZ re: tracing (.5); meeting with B. Lee and DDZ re: tracing (.5).	1.0	\$350	\$ 350.00
03/11/24	CMV	Discussions with DDZ re: tasks to be performed (.8); continued to prepare analysis of payments to lenders (2.2); analyzed inter account transfers (.7).	3.7	\$300	\$ 1,110.00
03/11/24	DDZ	Discussion with CMV re: next steps (.8); discussion with KMR re: tracing analysis (.5); meeting with KMR and Receiver re: tracing analysis (.5).	1.8	\$300	\$ 540.00
03/12/24	DDZ	Reviewed and analyzed documents received from Goodkind & Florio, P.A.	0.4	\$300	\$ 120.00
03/13/24	KMR	Meeting with Receiver and DDZ re: tracing analysis (1.0); discussion with DDZ re: next steps (.5).	1.5	\$350	\$ 525.00
03/13/24	CMV	Discussion with DDZ re: tasks to be performed (.5); traced closing costs disbursed by Goodkind & Florio, P.A. to bank statements (3.2); analyzed documents provided by Goodkind and Florio, P.A. (2.8).	6.5	\$300	\$ 1,950.00



YIP ASSOCIATES

FORENSIC ACCOUNTING +
FINANCIAL INVESTIGATIONS

Invoice Number: 32356

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Case No. 23-24903-CIV-ALTONAGA

For Professional Services Rendered January 12, 2024 through March 31, 2024

Date	Initials	Description	Hours	Rate	Amount
03/13/24	DDZ	Meeting with Receiver and KMR re: tracing analysis (1.0); discussion with KMR re: next steps (.5); discussion with CMV re: analysis of documents provided by Goodkind and Florio, P.A. (.5).	2.0	\$300	\$ 600.00
03/14/24	CMV	Discussion with DDZ re: work to be performed (.5); analyzed inter account transfers (6.6).	7.1	\$300	\$ 2,130.00
03/14/24	DDZ	Discussion with CMV re: analysis of records provided by Goodkind and Florio, P.A.	0.5	\$300	\$ 150.00
03/15/24	KMR	Various calls with Receiver re: payees (.3); performed name search (.2); reviewed documents provided by Goodkind and Florio, P.A. and updated lender analysis (2.9).	3.4	\$350	\$ 1,190.00
03/18/24	KMR	Performed tracing of Commodore customer deposits and reviewed QuickBooks (8.1); discussion with DDZ re: tracing analysis (.5).	8.6	\$350	\$ 3,010.00
03/18/24	DDZ	Discussion with KMR re: tracing analysis (.5); downloaded and reviewed files provided by Receiver's team (.5).	1.0	\$300	\$ 300.00
03/19/24	KMR	Performed tracing of lender funds and reviewed QuickBooks.	7.1	\$350	\$ 2,485.00
03/19/24	AY	Analyzed supporting transaction information for Bank of America accounts and update bank analysis.	1.1	\$250	\$ 275.00
03/20/24	KMR	Continued to perform tracing of lender funds and reviewed QuickBooks (5.4); discussion with AY re: Miami Beach customer deposits (.2).	5.6	\$350	\$ 1,960.00
03/20/24	DDZ	Performed tracing of lender funds.	8.7	\$300	\$ 2,610.00
03/20/24	AY	Discussion with KMR re: Miami Beach customer deposits (.2); prepared analysis of Miami Beach customer deposits (6.3).	6.5	\$250	\$ 1,625.00
03/21/24	KMR	Reviewed lender analysis (2.1); prepared lender flow of fund schedules (6.8).	8.9	\$350	\$ 3,115.00



YIP ASSOCIATES

FORENSIC ACCOUNTING +
FINANCIAL INVESTIGATIONS

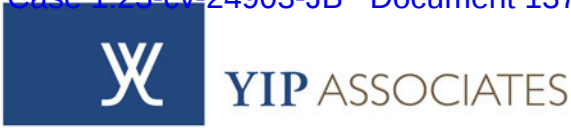
Invoice Number: 32356

Matter ID: 151.0001

Re: Location Ventures, LLC.
Case No. 23-24903-CIV-ALTONAGA

For Professional Services Rendered January 12, 2024 through March 31, 2024

Date	Initials	Description	Hours	Rate	Amount
03/21/24	DDZ	Continued to perform tracing of lender funds.	3.8	\$300	\$ 1,140.00
03/21/24	AY	Continued to prepare analysis of Miami Beach customer deposits.	6.3	\$250	\$ 1,575.00
03/22/24	KMR	Continued to review documents and prepare analysis of lender funds for the Villa Valencia project (2.8); discussion with AY re: analysis of Miami Beach customer deposits (.2); prepared for meeting with Receiver (.3); meeting with DDZ, Receiver and D. Rosendorf re: tracing analysis (1.5); reviewed analysis of Miami Beach customer deposits prepared by AY (.4); updated lender flow of fund schedules (1.6).	6.8	\$350	\$ 2,380.00
03/22/24	DDZ	Reviewed loan closing documentation related to Villa Valencia project (2.8); meeting with KMR, Receiver and Receiver's counsel re: tracing analysis (1.5); performed tracing of lender funds (4.9).	9.2	\$300	\$ 2,760.00
03/22/24	AY	Discussion with KMR re: Miami Beach customer deposits (.2); prepared analysis of Miami Beach customer deposits (4.3).	4.5	\$250	\$ 1,125.00
03/25/24	KMR	Performed tracing of Miami Beach customer deposits.	6.1	\$350	\$ 2,135.00
03/26/24	KMR	Continued to perform tracing of Miami Beach Deposits and reviewed QuickBooks.	7.7	\$350	\$ 2,695.00
03/27/24	KMR	Continued to performed tracing of Miami Beach customer deposits (3.8); meeting with Receiver, D. Rosendorf and DDZ re: deposits (1.3); prepared schedules of transactions to various payees and gathered supporting documents (1.8).	6.9	\$350	\$ 2,415.00
03/27/24	DDZ	Meeting with KMR, Receiver, and Receiver's counsel (1.3); prepared schedule of transfers from Stewart Grove 1, LLC to Location Capital, LLC (1.2); preparation of schedules (1.3).	3.8	\$300	\$ 1,140.00
03/28/24	DDZ	Continued to prepare schedules.	1.0	\$300	\$ 300.00



FORENSIC ACCOUNTING +
FINANCIAL INVESTIGATIONS

Invoice Number: 32356
Matter ID: 151.0001

Re: Location Ventures, LLC.
Case No. 23-24903-CIV-ALTONAGA

For Professional Services Rendered January 12, 2024 through March 31, 2024

Date	Initials	Description	Hours	Rate	Amount
03/29/24	DDZ	Downloaded and reviewed additional bank records produced.	0.5	\$300	\$ 150.00
Total Fees			667.5		\$203,150.00
<u>Expenses</u>					
		Print Job (93 pages at 20¢/page)			\$ 18.60
		Online legal search (80 pages at 10¢/page)			8.00
		Parking			128.47
Total Expenses					\$ 155.07
Total Amount Due					\$ 203,305.07

Please remit payment by mail to:

Yip Associates
2 South Biscayne Blvd., Suite 2690
Miami, FL 33131

Or, via ACH / wire transfer to:

FIRST HORIZON BANK
165 Madison Avenue
Memphis, TN 38103
ABA Number: **084000026**
Bank SWIFT / BIC Code: **FTBMUS44**

FIRST HORIZON BANK Credit Account Information
FHB Customer Name: **YIPCPA, LLC d/b/a YIP ASSOCIATES**
FHB Account Number: **[REDACTED]**
Amount of Wire: **\$203,305.07**

For Credit to: Yip Associates
2 South Biscayne Blvd., Suite 2690
Miami, FL 33131

EXHIBIT D

DAY PITNEY LLP'S TIME ENTRIES



BOSTON CONNECTICUT FLORIDA NEW JERSEY NEW YORK PROVIDENCE WASHINGTON, DC WWW.DAYPITNEY.COM

BERNICE LEE, ESQ., AS RECEIVER
2525 PONCE DE LEON BLVD., 9TH FLOOR
MIAMI, FL 33134

April 9, 2024

REPLACES BILL# 34278362 DATED 4/5/24

RE: 805708 - 000000 SPECIAL REAL ESTATE COUNSEL FOR REAL ESTATE

Tax Identification No. 06-0317480

REMITTANCE COPY – PAYABLE UPON RECEIPT

Total For Professional Services Rendered	12,648.50
Current Balance Invoice # 34279028	\$ 12,648.50

Amount Enclosed: \$ _____

Please return this Remittance with your check payable to: **Day Pitney LLP,**
P.O. Box 935743, Atlanta, GA 31193-5743
 'OR'
Pay Online via Credit Card, ACH or E-Check
using our secure payment portal:
www.e-billexpress.com/ebpp/DayPitneyLLP

Login Instructions:
 Payor ID: 805708
 Unique Identifier: 157922
 First time users: Please click "Enroll"

Wire Instructions

Please reference bill and/or client/matter number

Domestic: Wells Fargo Bank, NA, 420 Montgomery St., San Francisco, CA 94104
ABA Number: 121000248, Day Pitney Account # 9323992413

International: Wells Fargo Bank, NA, 420 Montgomery St., San Francisco, CA 94104
ABA Number: 121000248, Day Pitney Account # 9323992413
Beneficiary Account Name: Day Pitney LLP, Beneficiary Account Address: 1 Jefferson Road, Parsippany, NJ 07054
SWIFT Code: WFBUS6S

ACH Instructions: Wells Fargo Bank, NA, 420 Montgomery St., San Francisco, CA 94104
ABA Number: 021200025, Day Pitney Account # 9323992413

Questions regarding past due invoices, please call: (973) 966-8186



BOSTON CONNECTICUT FLORIDA NEW JERSEY NEW YORK PROVIDENCE WASHINGTON, DC WWW.DAYPITNEY.COM

BERNICE LEE, ESQ., AS RECEIVER
2525 PONCE DE LEON BLVD., 9TH FLOOR
MIAMI, FL 33134

April 9, 2024
Invoice: 34279028

Tax Identification No. 06-0317480

FOR PROFESSIONAL SERVICES RENDERED in the below captioned matter(s) for the period through March 31, 2024, including:

SPECIAL REAL ESTATE COUNSEL FOR REAL ESTATE (805708-000000)

<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
03/08/2024	Call with B. Lee regarding background on sale of Stewart property and correspond to various e-mails regarding same	Ferrera, S	0.5	\$ 250.00
03/09/2024	Review title commitment; review offer PSA with addendum; commence work on updating addendum to PSA	Ferrera, S	3.3	1,650.00
03/10/2024	Finalize addendum to PSA for client review; update PSA to align with new addendum	Ferrera, S	1.5	750.00
03/11/2024	Finalize addendum and forward to B. Lee for review; request lien search from Buyer's counsel; receipt and review partial lien search	Ferrera, S	0.5	250.00
03/12/2024	Receive and read e-mails between S. Ferrera and B.C. Lee regarding draft Purchase and Sale Agreement, brief file discussion with S. Ferrera about file processing	Alvarado, N	0.3	61.50
03/12/2024	Call with B. Lee regarding draft PSA and addendum	Ferrera, S	1.5	750.00

Day Pitney LLP

Invoice: 34279028

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
03/12/2024	Update PSA and addendum per call with B. Lee and forward for review; review e-mails with lender's counsel regarding file status	Ferrera, S	1.5	750.00
03/13/2024	Receipt and respond to e-mails from prospective Buyer's counsel	Ferrera, S	0.3	150.00
03/14/2024	Receipt review and mark up of revised addendum from B. Lee; forward redlined addendum with additional comments	Ferrera, S	1.0	500.00
03/19/2024	Call with B. Lee; finalize addendum and PSA and forward to buyer's counsel	Ferrera, S	0.5	250.00
03/20/2024	Forward PSA addendum in word format to Buyer's counsel	Ferrera, S	0.3	150.00
03/21/2024	Brief review of draft contract, review of redlined addendum to contract receive from B. Lee	Alvarado, N	0.2	41.00
03/21/2024	Review, comment and redline confidentiality agreement forward updated versions to B. Lee for review	Ferrera, S	1.5	750.00
03/22/2024	Call with A. Almazan regarding addendum inquiries; call with B. Lee regarding call with A. Almazan and case status	Ferrera, S	0.6	300.00
03/26/2024	Detailed review of listing documents; prepare summary of same; call with B. Lee regarding same and schedule call with Montana realtor	Ferrera, S	1.5	750.00
03/26/2024	Discuss research on escrow agent's right to resign and further obligations with S. Ferrera	Larsen, M	0.3	102.00
03/26/2024	Review Escrow Agreement and Florida Statutes for process for appointing a new escrow agent and refund of escrowed funds and prepare a memorandum explaining the same	Larsen, M	2.7	918.00
03/27/2024	Detailed review of escrow agreement and resignation of G&F; prepare issues summary for B. Lee; confer with M. Larsen regarding research and action items	Ferrera, S	1.0	500.00

Day Pitney LLP

Invoice: 34279028

Page: 3

<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
03/27/2024	Prepare draft e-mail to escrow agent regarding not accepting resignation and forward to B. Lee for approval	Ferrera, S	1.0	500.00
03/27/2024	Call with Montana realtor, Jeannie de Carlos; receipt review and markup listing agreement; forward to realtor for changes to be made and forward insurance broker info to B. Lee	Ferrera, S	1.0	500.00
03/27/2024	Prepare a memorandum of escrow agent's responsibilities, disbursement of deposit funds, and assurances	Larsen, M	2.8	952.00
03/27/2024	Research Florida case law related to Fla. Stat. 718.202 and the developer's, surety's, and escrow agent's liability for refund of deposits	Larsen, M	2.6	884.00
03/27/2024	Research case law regarding circumstances in which an escrow agent is not permitted to resign	Larsen, M	1.0	340.00
03/28/2024	Call with B. Lee & DBPR Division regarding escrow issues on Miami Beach parcel	Ferrera, S	0.5	250.00
03/28/2024	Review and comment on addendum marked up by Buyer's counsel; prepare e-mail to B. Lee regarding same; call with B. Lee and D. Rosendorf to discuss same	Ferrera, S	0.7	350.00

<u>Summary of Hours</u>	<u>Rank</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Sandra M. Ferrera	Partner	18.7	\$ 500	\$ 9,350.00
Monica Larsen	Associate	9.4	340	3,196.00
Niurka Alvarado	Paralegal	0.5	205	102.50
Total		28.6		\$ 12,648.50

Total For Professional Services Rendered	12,648.50
Total Bill	\$ 12,648.50

EXHIBIT E

SEC'S STANDARDIZED FUND ACCOUNTING REPORT

Bernice C. Lee, as Receiver
 SEC v. Rishi Kapoor, et al.
 Case No. 23-24903-CIV-JB

STANDARDIZED FUND ACCOUNTING REPORT
Reporting Period:
01/12/2024-03/31/2024

FUND ACCOUNTING				
		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (as of 01/12/2024)	\$0.00		\$0.00
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income	\$3,834.00		
Line 3	Cash and Securities	\$1,360,814.55		
Line 4	Interest/Dividend Income	\$15,758.68		
Line 5	Business Asset Liquidation (Note 1)	\$762,235.37		
Line 6	Personal Asset Liquidation			
Line 7	Additional Third-Party Claims Recovery			
Line 8	Miscellaneous – Other (Note 2)	\$59,652.88		
	Total Funds Available (Lines 1-8):			\$2,202,295.48
	<i>Decreases in Fund Balance:</i>			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Receivership Operations			
Line 10a	<i>Disbursements to Receiver or Other Professionals</i>			
Line 10b	Business Asset Expenses	\$2,492.65		
Line 10c	Personal Asset Expenses			
Line 10d	Investment Expenses	\$10.00		
Line 10e	<i>Additional Third-Party Litigation Expenses</i>			
	1. Attorney Fees			
	2. Litigation Expenses			
	<i>Total Additional Third-Party Litigation Expenses</i>			
Line 10f	Tax Administrator Fees and Bonds			
Line 10g	Federal and State Tax Payments (Note 3)	\$7,948.85		
Line 10h	Miscellaneous – Other (Note 4)	\$586.09		
	Total Disbursements for Receivership Operations			\$10,451.50
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	<i>Distribution Plan Development Expenses:</i>			
Line 11b	<i>Distribution Plan Implementation Expenses:</i>			
	Total Disbursements for Distribution Expenses Paid by the Fund:			\$0.00
	Disbursements to Court/Other:			
Line 12a	<i>Investment Expenses/Court Registry Investment System (CRIS) Fees</i>			
Line 12b	<i>Federal Tax Payments</i>			
	Total Disbursements to Court/Other:			\$0.00
	Total Funds Disbursed (Lines 9-11):			\$10,451.50
Line 13	Ending Balance (as of 03/31/2024):			\$2,191,843.98
Line 14	Ending Balance of Fund – Net Assets:			
Line 14a	Cash & Cash Equivalents	\$2,191,843.98		
	Investments			
Line 14c	Other Assets or Uncleared Funds			
	Total Ending Balance of Fund – Net Assets			\$2,191,843.98
OTHER SUPPLEMENTAL INFORMATION				
		Detail	Subtotal	Grand Total
Line 15-19		N/A		

- Note 1: Net sale proceeds from sale of Minorca parcel (folio no. 03-4108-006-1200)
- Note 2: Return of retainers and premium
- Note 3: Flathead County, Montana Real Property Taxes
- Note 4: Scan job and document production payments

EXHIBIT F

PROPOSED ORDER

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 23-24903-CIV-JB

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

RISHI KAPOOR, et al.,

Defendants.

**ORDER GRANTING RECEIVER'S FIRST INTERIM APPLICATION FOR
PAYMENT OF FEES AND EXPENSES OF RECEIVER AND HER PROFESSIONALS**

THIS CAUSE is before the Court on the Receiver's First Interim Application to Authorize Payment of Fees and Expenses of Receiver and her Professionals (ECF No. [___]). By the First Fee Application, the Receiver seeks payment of fees and costs incurred by the Receiver and her professionals from January 12, 2024 through March 31, 2024 (the "First Application Period").

The Court has considered the First Interim Application to Authorize Payment of Fees and Expenses of Receiver and her Professionals (ECF No. [___]) and the attachments thereto and finds and concludes the requested fees and expenses represent actual and necessary expenses incurred in the performance of the Receiver's duties, for which the Receiver and her professionals are entitled to compensation pursuant to the Order Appointing Receiver (ECF No. [28]). Accordingly, it is hereby

ORDERED AND ADJUDGED as follows:

1. The Receiver's First Interim Application to Authorize Payment of Fees and Expenses of Receiver and her Professionals (ECF No. [___]) is **GRANTED**.

2. The fees of the Receiver Bernice C. Lee for the First Application Period in the amount of \$140,140.00 are APPROVED.

3. The fees and expenses of Kozyak, Tropin & Throckmorton LLP for the First Application Period in the amount of \$159,900.00 in fees and \$9,373.63 in expenses are APPROVED.

4. The fees and expenses of Yip Associates, Certified Public Accountants for the First Application Period in the amount of \$203,150.00 in fees and \$155.07 in expenses are APPROVED.

5. The fees of Day Pitney LLP for the First Application Period in the amount of \$12,648.50 are APPROVED.

6. The Receiver is authorized to pay 80% of the approved fees (\$112,112.00 as to the Receiver Bernice Lee, \$127,920.00 as to Kozyak Tropin & Throckmorton LLP, \$162,520.00 as to Yip Associates, Certified Public Accountants, and \$10,118.80 as to Day Pitney LLP) and 100% of the approved expenses from the assets held by the Receivership Estate.

7. The Receiver may request payment of the remaining balance of the approved fees (i.e., the 20% holdback) upon final distribution of Receivership assets to investors.

DONE AND ORDERED in Miami, Florida this ____ day of May, 2024.

JACQUELINE BECERRA
UNITED STATES DISTRICT JUDGE

cc: counsel of record