

**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.

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**RECEIVER’S THIRD 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, submits her Third Interim Application to Authorize Payment of Fees and Expenses of Receiver and Her Professionals (the “Application”). The Application is the third interim application for payment of fees and expenses submitted by the Receiver and covers the period from July 1, 2024 through September 30, 2024 (the “Application Period”).<sup>1</sup>

**I. General Summary**

This receivership involves twenty-two entities named as defendants<sup>2</sup> (collectively, the “Receivership Defendants”), over twenty subsidiaries and related entities, seven real estate

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<sup>1</sup> 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.

<sup>2</sup> 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; 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.

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 professionals<sup>3</sup> during the Application Period is as follows: (a) for the Receiver, fees in the amount of \$107,905.00 and no expenses, *see Exhibit A*, (b) for Kozyak Tropin & Throckmorton, LLP (“KTT”), fees in the amount of \$167,425.00 and expenses in the amount of \$29,128.30, *see Exhibit B*, (c) for Yip Associates, fees in the amount of \$6,225.00 and no expenses, *see Exhibit C*, and (d) for Day Pitney LLP, fees in the amount of \$34,540.00 and expenses in the amount of \$31.00, *see Exhibit D*.

The Receiver’s fees and average hourly billing rates 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 receivership matters, 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 rates 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 rates from \$150 to \$140 per hour. Day Pitney reduced its partner attorney rates from \$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.

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<sup>3</sup> 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. KTT 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.

## **II. Overview of the Receivership Case**

As set forth in the Receiver's Third Interim Report filed on October 30, 2024 [DE 287], the focus of the Receiver's efforts in the Application Period has been on: (a) closing on the sale of the Stewart Grove property and addressing the appeal of the sale order for the Stewart Grove property, (b) assessing the potential disposition of the Villa Valencia Unit 1104, Miami Beach property and Commodore properties (discussed in detail below) and negotiating sale terms with purchasers, (c) drafting sale contracts, motions to approve sale and related proposed orders, and related declarations, (d) for the Miami Beach property, negotiating settlement terms with the secured lender and addressing the City of Miami Beach's claims and charges, (e) responding to Rishi Kapoor's motion to extend time of foreclosure stay period for real property in Coconut Grove owned by his related entity, and (f) addressing pending litigation and creditor and investor inquiries and investigating potential litigation claims.

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: (a) close on the sale of the Stewart Grove property and address the appeal of the sale order, (b) negotiate the terms of sale contracts for Villa Valencia Unit 1104, Miami Beach property and Commodore properties, (c) prepare and obtain an order approving the sale of Villa Valencia Unit 1104, (d) prepare and file with the Court a motion to

approve sale of the Miami Beach property and related lender settlement and resolution of the City of Miami Beach's claims and charges, (e) prepare and file with the Court a motion to approve sale of the Commodore properties, and (f) respond to Rishi Kapoor's motion to extend time of foreclosure stay period for real property in Coconut Grove owned by his related entity.

The Receiver and her counsel continue to have several meetings and phone conferences with lenders, landlords, unit depositors, investors, and other parties related to receivership property. A summary of the real estate properties and tasks performed during the Application Period is provided below:

**Stewart Grove Property:** On June 17, 2024, the Court entered an Order approving the Receiver's proposed \$17.5 million sale of a luxury single family home constructed on two parcels with the address of 3620 and 3610 Stewart Avenue, Miami, Florida owned by Stewart Grove 1, LLC, and settlement agreement with the first position lender that provided for a reduced payment and carveout from its lien for the benefit of the receivership estate (the "Stewart Grove Sale Order") [DE 185]. During the Application Period, the Receiver and her professionals attended to various issues to facilitate closing, including closing documents, additional access agreements, and onsite visits with the buyer and its contractors.

The sale closed on July 29, 2024. The escrow agent disbursed \$14,084,835.19 to the lender for the lender payment, and \$3,238,475.34 to the receivership estate. Of the \$3,238,475.34: (a) \$797,412.36 is the carveout from the lender's first position lien for the benefit of the receivership estate, (b) \$2,341,062.98 is for the Stewart Lien Claim Fund to pay other valid lien claims against the Stewart Property, and (c) \$100,000 is for the lender fee reserve that was disbursed as follows: \$79,088.16 to the lender, \$10,455.92 to the lender and \$10,455.92 to the Stewart Lien Claim Fund.

On August 12, 2024, Martin I. Halpern Revocable Trust and Halpern Family Trust (the “Halpern Trusts”) filed a notice of appeal of the Stewart Grove Sale Order. The Receiver and her professionals have spent a meaningful amount of time researching case law on various procedural and substantive appellate issues, preparing the certificate of interested parties, and ensuring all required transcripts are designated.

**Villa Valencia Condos:** 515 Valencia SPE, LLC, a wholly owned subsidiary of 515 Valencia Partners, LLC, owns Units 1104, 1201, 1202 and 1301 in a condominium building located at 515 Valencia Ave., Coral Gables, Florida 33134.

During the Application Period, the Receiver spent a significant amount of time negotiating sale terms with a buyer for Unit 1104 and drafting a sale contract. On August 21, 2024, the Receiver filed the Receiver’s Expedited Motion to Approve Sale of Valencia Unit 1104 Property Free and Clear [DE 208] seeking approval a sale contract for with a \$3,960,000 purchase price plus an additional fee of \$50,000 for a total of \$4,010,000 with net sale proceeds to be held in the Valencia Lien Claim Fund with allocation and disbursement to be addressed by the Receiver in a subsequent pleading. On August 29, 2024, the Court entered the Order Granting Receiver’s Expedited Motion to Approve Sale of Valencia Unit 1104 Property Free and Clear [DE 216]. On November 1, 2024, the Receiver closed on the sale, and received the \$3,960,000 sale price, the \$50,000 additional purchase fee, and \$1,591.91 to reimburse the receivership estate for electrical bills paid by the estate while the sale contract was pending.

On July 3, 2024, the Court entered an Order approving the Receiver’s request to hire a broker for Unit 1301 [DE 189]. The Receiver and her counsel have spent a meaningful amount of time working with the broker to list and market Unit 1301, and meeting parties who have expressed interest in the remaining three units. The Receiver has had multiple discussions with purchasers

under pre-receivership sale contracts for Units 1201 and 1202, including with respect to potential resolutions that include an “as is where is” sale of the units.

The Receiver and her counsel have also attended to multiple meetings, calls and e-mail communications with creditors, the City of Coral Gables, the condominium association and its counsel, and other parties regarding issues relating to the building and the temporary certificate of occupancy. In August 2024, the Receiver finalized an agreement with AT&T to relocate wires on poles on Hernando Street to underground, with the approval of the City of Coral Gables. The City has agreed to release funds from a bond to pay for the amount due under the agreement, and has been coordinating with the appropriate department to issue payment.

**Miami Beach Property:** 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 a gutted office building, folio no. 02-4203-009-0050.

On April 15, 2024, the Court entered an Order approving the Receiver’s request to hire a broker for the Miami Beach property [DE 124]. During the Application Period, the Receiver and her counsel spent a substantial amount of time preparing a stalking horse and non-stalking horse sale contract, negotiating sale terms with interested parties, conducting conference calls with the lender and broker, negotiating settlement terms with the first position lender, and addressing amounts pending as owed for the properties and code violations with the City of Miami Beach.

On September 10, 2024, the Receiver filed the Receiver’s Expedited Motion to Approve Sale of Miami Beach Property Free and Clear and Related Settlement Agreement (the “Miami Beach Sale Motion”) [DE 220]. A group of individuals and companies who had entered into pre-construction agreements and provided deposits for the planned units for the Miami Beach property

(the “MB Unit Depositors”) sought to be heard with respect to their objections to the Miami Beach Sale Motion. On September 23, 2024, the Court held a status conference and provided a briefing schedule for the MB Unit Depositors to file their objections and the Receiver to file her reply in October 2024.

**Commodore Properties:** Urbin Coconut Grove Partners, LLC is the owner of the following four entities that own real property and/or leasehold rights in properties located on Commodore Plaza in Coconut Grove, Miami (the “Commodore Companies”): (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 real property with an address of 3170 Commodore Plaza, Miami, FL 33133, and is the lessee under a ground lease with Dharma Studio, Inc. for real property located at 3166 Commodore Plaza, Miami, FL 33133, (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, 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.

During the Application Period, the Receiver and her counsel have spent an extensive amount of time negotiating the terms of a sale of the Commodore properties with a purchaser, revising a sale contract for sale of all the properties, and compiling documents from the Receivership Companies and Commodore Companies relating to the development for the purchaser. On September 24, 2024, the Receiver filed the Receiver’s Motion to Approve Sale of Commodore Properties Free and Clear of Liens, Encumbrances and Interests [DE 238] seeking to approve a \$28.2 million dollar sale with the disbursement of net sale proceeds to be addressed in

a later pleading. As described in the motion, the Commodore properties are a complex assemblage of interests with many complications and challenges.

The Receiver and her counsel have also had multiple discussions with the lessors under the ground leases, the Halpern Trusts as lender to the properties, the City of Miami, and other creditors.

**Montana Property:** 7240 US Highway 2 SPE, LLC, a wholly owned subsidiary of LV Montana Phase I, LLC, owns real property consisting of 12.37 acres and residential structure with an address of 7240 US Highway 2 E, Columbia Falls, Montana 59912 (folio no. 07-4186-15-2-09-30-0000). On May 21, 2024, the Court approved the receiver's request to employ a broker [DE 160]. The Receiver has spent a meaningful amount of time addressing property maintenance items, and working with the broker to list and market the property.

**Los Pinos Property:** 7233 Los Pinos LLC ("7233 Los Pinos"), an entity Mr. Kapoor has stated that he and Jeannie Frank Kapoor own through an entity named Kapoor, LLC, owns the property located at 7233 Los Pinos Blvd in Coral Gables, Florida., which is subject to a foreclosure action. On June 3, 2024 [DE 175], the Court entered an Order approving an agreement [DE 175] under which Mr. Kapoor, 7233 Los Pinos and the lender agreed, *inter alia*, that: (a) 7233 Los Pinos can employ Boschetti Realty Group as a listing agent to sell the property, (b) all terms of any proposed sale or offer would be shared with the lender, (c) all net proceeds would be escrowed with the Receiver's counsel pending a determination of entitlement, (d) there would be a 90 day foreclosure stay through September 5, 2025 and a 90-day credit of the amount between default and non-default interest rate if 7233 Los Pinos entered into a sale agreement during the 90 day period, and (e) the Receiver could elect to extend the stay period for another 90 days or not extend, in which case the lender would pay the Receiver the different between the default and non-default interest rate for a 90 day period.

The Receiver and her counsel spent a considerable amount of time addressing issues relating to the Los Pinos property. They conducted multiple discussions with the broker, counsel for 7233 Los Pinos, counsel for Mrs. Kapoor and counsel for Mr. Kapoor to discuss the status of the sale process, offers and timing issues. They made an effort to discuss with the Kapoors and 7233 Los Pinos the Receiver's analysis in favor of accepting a sale contract during the foreclosure stay period, and not holding out for a better offer after the foreclosure stay period because the potential higher value would not be offset by the loss of the interest credit, loss of payment to the Receiver, and additional default interest, plus risk and uncertainty of a hypothetical "better deal."

No sale contract was presented by the September 5, 2024 deadline, and instead, Mr. Kapoor filed a motion to extend time of foreclosure stay [DE 217]. On September 19, 2024, the Receiver filed a response in opposition to the motion [DE 227]. On October 9, 2024, the Court entered an Order denying the motion [DE 254]. The Receiver declined to elect to extend the foreclosure stay period, and in October 2024, the Receiver received \$150,000 from the lender.

## **ii. Asset Analysis and Recovery**

During the Application Period, the Receiver and her professionals have continued to identify and review bank accounts used for transactions involving the Receivership Defendants and related entities, including their bank accounts, third party escrow accounts and law firm accounts, and obtaining records for such accounts and transactions through requests and subpoenas to third parties. The Receiver and her professionals are reviewing over 40,000 transactions occurring across more than 45 bank accounts, and purchaser deposits for the Miami Beach, Commodore and Villa Valencia properties, as well as other transactions engaged in by the Receivership Companies and potential recoveries in connection with those transactions.

### **iii. Case Administration**

During the Application Period, the Receiver and her counsel spent a substantial amount of time addressing case administration matters, including attending to: various document requests and ESI issues, document review for certain requests, corporate filings with the State of Florida, insurance coverage, updates for 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/>), monitoring over twenty-five Florida state and federal court proceedings filed prior to or after the Court entered the Receivership Order, searching and reviewing documents relating to the Receivership Defendants and related entities to address requests from various parties, and attending virtual meetings with the board members for the Villa Valencia building condominium association and its counsel.

### **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 depositors and other claimants to discuss the SEC action, Receivership Order, potential claims process, and issues relating to particular 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 continued to assist the Receiver with

analyzing escrow account activity and related documents from the escrow agent for the Villa Valencia building which has 39 units of which 35 were sold pre-receivership, and additional bank records received from JP Morgan Chase.

**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 Sandra Ferrera and Day Pitney to assist with real estate transaction matters. During the Application Period, Ms. Ferrera and Day Pitney have provided substantial assistance to the Receiver in assisting with the closing of the Stewart property, drafting sale contracts and related documents for the Villa Valencia Unit 1104, Miami Beach property and Commodore property, and reviewing and obtaining updates for title commitments. She has assisted with numerous issues arising with these properties, including access agreements for inspections and maintenance work, listing agreements, violation notices from multiple municipalities, public works proposals and calls with the City of Coral Gables relating to the temporary certificate of occupancy for the Villa Valencia building, and parking and utility issues for the Villa Valencia building.

**IV. Standardized Fund Accounting Report**

The SEC's Standardized Fund Accounting Report for the Application Period is attached hereto as Exhibit E. As of September 30, 2024, the Receivership Estate has cash on hand in the amount of \$3,223,928.06 and \$2,351,518.90 in the Stewart Lien Claim Fund, 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 third 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 cash on hand currently held in the Receiver's account, subject to reimbursement from the sale of certain collateral in the event sought by the Receiver and approved by the Court.

**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 \$107,905.00 in fees; Kozyak, Tropin & Throckmorton, LLP in the amount of \$167,425.00 in fees and \$29,128.30 in expenses; Yip Associates in the amount of \$6,225.00 in fees; and Day Pitney in the amount of \$34,540.00 in fees and \$31.00 in expenses;
- (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 or further order of the Court.

Respectfully submitted,

**KOZYAK TROPIN & THROCKMORTON, LLP**  
2525 Ponce de Leon Boulevard, 9<sup>th</sup> Floor  
Coral Gables, Florida 33134  
Tel: (305) 372-1800 / Fax: (305) 372-3508  
Email: [dlr@kttlaw.com](mailto: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 14th day of November, 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 14th day of November 2024.

# **EXHIBIT A**

RECEIVER’S TIME ENTRIES

Summary of Professionals And Paraprofessional Time

Attorney Name		Licensed	Hours	Rate	Fee
BERNICE C. LEE	Partner	2009	308.30	350.00	107,905.00
Total Hours by Professionals and Paraprofessionals:					308.30
"Blended" Hourly Rate:					350.00
Total Professionals and Paraprofessionals Fees:					107,905.00

\* 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	5.40	350.00	1,890.00
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Total for Category ASSET ANALYSIS AND RECOVERY		5.40	350.00	1,890.00
-				
BERNICE C. LEE	2009	246.30	350.00	86,205.00
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Total for Category ASSET DISPOSITION		246.30	350.00	86,205.00
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BERNICE C. LEE	2009	49.80	350.00	17,430.00
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Total for Category CASE ADMINISTRATION		49.80	350.00	17,430.00
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BERNICE C. LEE	2009	6.80	350.00	2,380.00
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Total for Category CLAIMS ADMINISTRATION AND OBJECTIONS		6.80	350.00	2,380.00
-				
Grand Total		308.30	350.00	107,905.00

For Professional Services Rendered

re: 5956-101

SEC V. RISHI KAPOOR, ET AL.

## ASSET ANALYSIS AND RECOVERY

July 9, 2024	BCL	Call and emails with K. Rin to discuss pending open items and status, and vendor regarding document pickup.	0.40	140.00
July 10, 2024	BCL	Emails with D. Rosendorf regarding letter for and prior notice to D. Motha, and review records relating to same.	0.30	105.00
July 22, 2024	BCL	Call with K. Rin regarding funding related to 2EE loans, and review documents relating to same.	0.80	280.00
August 29, 2024	BCL	Review information from accountants regarding additional documents, insert comments in summary, and call with A. Chinchilla regarding preparing letters and subpoenas.	0.70	245.00
August 30, 2024	BCL	Emails with counsel for Woodforest bank regarding additional bank records, and email A. Chinchilla regarding same.	0.20	70.00
September 4, 2024	BCL	Review questions from A. Chinchilla regarding letters and subpoena to certain banks, provide comments, and emails with A. Chinchilla regarding same.	0.40	140.00
September 5, 2024	BCL	Emails with D. Rosendorf, F. Saint-Remy and S. Silver regarding additional production from Woodforest Bank.	0.20	70.00
September 5, 2024	BCL	Review and revise various letters and subpoenas for financial institutions for document requests, and notice of same, and emails with A. Chinchilla and Y. Castro regarding same.	1.50	525.00
September 6, 2024	BCL	Review and address comments for notice of subpoenas, and emails with Y. Castro and A. Chinchilla regarding same.	0.20	70.00
September 9, 2024	BCL	Emails with A. Chinchilla regarding	0.20	70.00

		City National Bank production.		
September 10, 2024	BCL	Review bank records relating to certain transfers relating to Commodore properties and other entities, and emails with R. O'Brien regarding same.	0.20	70.00
September 19, 2024	BCL	Emails with A. Chinchilla regarding new subpoena, service status, and additional requests for JPMorgan Chase.	0.30	105.00
Total for ASSET ANALYSIS AND RECOVERY			----- 5.40	1,890.00

## ASSET DISPOSITION

July 1, 2024	BCL	Draft and revise access agreement for Stewart property and review related documents, and emails with N. Yidi regarding same.	0.90	315.00
July 1, 2024	BCL	Review proposed buyer's revisions to Commodore sale contract, and prepare notes for same.	0.70	245.00
July 1, 2024	BCL	Call with S. Ferrera, D. Rosendorf and D. Samole to discuss proposed buyer's changes to Commodore sale contract, and prepare for conference call with said party.	2.00	700.00
July 1, 2024	BCL	Call with S. Ferrera, D. Rosendorf, D. Samole and proposed buyer and counsel regarding open items for Commodore sale contract.	1.00	350.00
July 1, 2024	BCL	Emails and call with J. Govin and D. Rosendorf regarding Miami Beach and sale proposal.	0.30	105.00
July 1, 2024	BCL	Call with J. Alderman and D. Rosendorf regarding Miami Beach, Villa Valencia and Stewart properties.	1.00	350.00
July 1, 2024	BCL	Calls with D. Rosendorf and L. Fisher regarding Miami Beach offer and related issues.	0.50	175.00
July 2, 2024	BCL	Calls with L. Fisher and D. Rosendorf regarding Miami Beach property, and lender and sale process update.	0.70	245.00
July 2, 2024	BCL	Review Commodore violation notices, and emails with interested party and F. Saint-Remy regarding same and data room.	0.30	105.00
July 2, 2024	BCL	Call with M. Raymond, R. Hyman and D. Rosendorf regarding properties relating to M. Halpern, and discussions with D. Rosendorf regarding same.	0.60	210.00
July 2, 2024	BCL	Review title items for Villa Valencia unit, and emails with S. Ferrera regarding same.	0.30	105.00

July 2, 2024	BCL	Review and revise Villa Valencia sale contract.	0.80	280.00
July 2, 2024	BCL	Stewart property site visit with buyer's contractor to assess certain issues.	2.00	700.00
July 2, 2024	BCL	Review pre-receivership contract for Unit 1202 for certain provisions, update notes for same, and email J. Minsker regarding same.	0.70	245.00
July 2, 2024	BCL	Emails with potential purchaser for Villa Valencia unit regarding sale contract, parking spaces and private garage.	0.70	245.00
July 2, 2024	BCL	Review pre-receivership contract for Unit 1201 for certain provisions, update notes for same, and email T. Lehman regarding same.	0.70	245.00
July 2, 2024	BCL	Emails with law firm for Villa Valencia association and S. Ferrera regarding board meeting, and assignment of private garages and parking spaces.	0.40	140.00
July 2, 2024	BCL	Emails with J. DeCarlo regarding plumbing and cleaning for Montana property, and review photos.	0.20	70.00
July 3, 2024	BCL	Calls and emails with J. Alderman, D. Rosendorf and L. Fisher regarding Miami Beach property, sale process and alternatives.	1.80	630.00
July 3, 2024	BCL	Emails with S. Ferrera and V. Bonet regarding AT&T scope of work and related items for Villa Valencia and City of Coral Gables.	0.50	175.00
July 3, 2024	BCL	Emails with potential purchaser regarding Commodore condo owners.	0.10	35.00
July 3, 2024	BCL	Email M. Raymond, F. Armada and R. Hyman regarding potential purchaser for Commodore properties.	0.10	35.00
July 3, 2024	BCL	Emails with potential purchaser for Villa Valencia unit regarding private garage and parking spaces, and emails with S. Ferrera regarding same.	0.70	245.00

July 3, 2024	BCL	Draft motion to approve sale of Commodore properties.	2.00	700.00
July 3, 2024	BCL	Review revisions to Commodore sale contract, and emails with D. Rosendorf, D. Samole and S. Ferrera regarding same.	1.80	630.00
July 4, 2024	BCL	Calls with D. Rosendorf and L. Fisher, J. Alderman, and R. Gutlohn regarding Miami Beach and Villa Valencia sale processes and related issues, and prepare for same.	2.00	700.00
July 4, 2024	BCL	Calls with D. Rosendorf to discuss Miami Beach sale process, Commodore sale motion, Villa Valencia sale process, and related issues.	1.80	630.00
July 4, 2024	BCL	Emails with S. Ferrera regarding closing allocation for Commodore properties.	0.10	35.00
July 4, 2024	BCL	Emails with potential purchaser for Commodore properties regarding third parties to contact and related issues.	0.10	35.00
July 4, 2024	BCL	Meeting with J. Wang to discuss Villa Valencia penthouse.	0.50	175.00
July 4, 2024	BCL	Emails with Y. Castro regarding responses from claimants to Stewart sale order and lien submission.	0.20	70.00
July 8, 2024	BCL	Draft proposed order for Commodore sale, and email D. Rosendorf and S. Ferrera regarding same.	1.60	560.00
July 8, 2024	BCL	Emails with potential purchaser and F. Saint-Remy regarding retail lease agreement for Commodore property.	0.20	70.00
July 8, 2024	BCL	Emails with potential purchaser and S. Ferrera regarding parking spaces information, association and management office for Villa Valencia.	0.20	70.00
July 8, 2024	BCL	Emails with J. Alderman, L. Fisher and R. Gotlohn regarding interested party and Miami Beach property.	0.20	70.00

July 8, 2024	BCL	Calls with J. Alderman, R. Gutlohn, L. Fisher and D. Rosendorf regarding Miami Beach properties, and review notes for same.	1.00	350.00
July 8, 2024	BCL	Review sale contract for yacht, settlement agreement and amounts owed, and email D. Rosendorf regarding same.	0.20	70.00
July 9, 2024	BCL	Access and review bank statement, and emails with C. Herskowitz regarding same and standardized accounting report.	0.20	70.00
July 9, 2024	BCL	Review information and emails relating to Villa Valencia parking spaces, private garages and cabanas, and emails with S. Ferrera regarding same and summary of open items.	0.80	280.00
July 9, 2024	BCL	Calls with potential purchaser for Commodore properties and D. Rosendorf to discuss sale process, third parties, and open items for sale contract.	0.80	280.00
July 9, 2024	BCL	Calls and emails with interested parties for Villa Valencia unit.	0.30	105.00
July 9, 2024	BCL	Emails with M. Raymond and condo unit owners for Commodore property regarding potential purchaser, and email potential purchaser regarding M. Raymond.	0.40	140.00
July 9, 2024	BCL	Emails with S. Ferrera and title company regarding Commodore parcels.	0.20	70.00
July 10, 2024	BCL	Emails with R. Gutlohn, J. Alderman and L. Fisher regarding access and showing for Miami Beach property.	0.20	70.00
July 10, 2024	BCL	Emails with S. Bignon, G. Savage, A. Gonzalez and prospective purchaser regarding potential Commodore sale.	0.40	140.00
July 10, 2024	BCL	Review deed, affidavit and assignment documents for Commodore sale contract, and emails with D. Rosendorf and S. Ferrera regarding same.	0.60	210.00

July 10, 2024	BCL	Emails with D. Flores, J. Minsker, and J. Hernandez regarding access request for Villa Valencia unit.	0.20	70.00
July 10, 2024	BCL	Review emails with title company for Miami Beach, and email S. Ferrera regarding title items.	0.20	70.00
July 10, 2024	BCL	Emails with [REDACTED] and K. Rin regarding certain audit reports for certain entities.	0.20	70.00
July 10, 2024	BCL	Emails with creditor regarding receivership and Stewart sale order.	0.20	70.00
July 10, 2024	BCL	Emails and call with F. Saint-Remy and D. Rosendorf and [REDACTED] regarding various requests.	0.50	175.00
July 11, 2024	BCL	Review parking schematic, and various documents and emails relating to parking spaces, private garages and cabanas for Villa Valencia, and prepare chart and notes for site visit.	2.50	875.00
July 11, 2024	BCL	Call with interested party regarding Villa Valencia unit, and email S. Ferrera regarding permit issue.	0.40	140.00
July 11, 2024	BCL	Emails with D. Rosendorf and prospective purchaser regarding purchase option relating to certain Commodore parcels and related documents, and call with prospective purchaser, said party's counsel and D. Rosendorf regarding same.	0.70	245.00
July 11, 2024	BCL	Draft sale motion for Commodore properties, and email D. Rosendorf regarding same and items to address.	1.30	455.00
July 11, 2024	BCL	Calls and emails with J. Alderman, R. Gutlohn, L. Fisher, D. Rosendorf and S. Ferrera regarding Miami Beach and issues relating to sale proposal.	0.60	210.00
July 11, 2024	BCL	Revise Miami Beach sale contract for potential private sale, and email S. Ferrera regarding same.	1.30	455.00
July 12, 2024	BCL	Emails with N. Yidi and R. Neary regarding Stewart property access.	0.20	70.00

July 12, 2024	BCL	Review revised Commodore sale contract, prepare comments, and review D. Rosendorf's comments to same.	0.80	280.00
July 12, 2024	BCL	Meeting with interested party for Villa Valencia unit.	0.70	245.00
July 12, 2024	BCL	Call with potential purchaser, counsel, D. Rosendorf, S. Ferrera and D. Samole regarding Commodore sale contract.	1.20	420.00
July 12, 2024	BCL	Villa Valencia site visit with S. Ferrera to assess parking spaces, private garages and cabanas, and discussions with J. Hernandez regarding same.	1.50	525.00
July 12, 2024	BCL	Analyze payments and disbursements for potential sale of Miami Beach property, lender payment and sale price, prepare notes and spreadsheet for same, and emails with S. Ferrera and D. Rosendorf regarding same.	1.80	630.00
July 12, 2024	BCL	Draft proposed settlement terms for lender for potential Miami Beach sale, and emails with S. Ferrera and D. Rosendorf regarding same.	1.50	525.00
July 12, 2024	BCL	Emails and call with potential purchaser for Villa Valencia unit.	0.20	70.00
July 12, 2024	BCL	Emails with J. Minsker and R. Neary regarding access to Villa Valencia unit.	0.10	35.00
July 15, 2024	BCL	Calls and emails with interested parties for Villa Valencia unit, and additional information for sale contract.	0.80	280.00
July 15, 2024	BCL	Revise sale contract for Villa Valencia unit, and email and call with S. Ferrera regarding same.	0.80	280.00
July 15, 2024	BCL	Draft background section to address sale contract, property and loans for Villa Valencia unit sale motion.	2.60	910.00
July 15, 2024	BCL	Draft proposed sale order for Villa Valencia, and email S. Ferrera regarding same.	1.00	350.00

July 15, 2024	BCL	Review schedules and other information relating to loans for Villa Valencia, and emails with D. Rosendorf and K. Rin regarding same.	1.50	525.00
July 15, 2024	BCL	Call with D. Rosendorf to discuss items relating to lender and Villa Valencia sale.	0.20	70.00
July 15, 2024	BCL	Email S. Ferrera regarding open items for potential Miami Beach sale negotiations.	0.10	35.00
July 15, 2024	BCL	Email with J. DeCarlo regarding status of Montana property cleaning and showings.	0.10	35.00
July 16, 2024	BCL	Call with G. Ceballos, P. Rodas, S. Ferrera and D. Rosendorf regarding AT&T proposal issues, permits for unfinished units, and FLP bill relating to Villa Valencia,	1.00	350.00
July 16, 2024	BCL	Review AT&T quote and related information, and email A. Puebla and A. Sanchez regarding open items.	0.80	280.00
July 16, 2024	BCL	Revise Commodore sale order, and email potential purchaser and counsel regarding same.	0.40	140.00
July 16, 2024	BCL	Calls with D. Rosendorf to discuss pending items for Villa Valencia, Commodore and Miami Beach.	0.60	210.00
July 16, 2024	BCL	Calls and emails with J. Alderman and T. Tolentino regarding Villa Valencia loans and proposed sale.	0.30	105.00
July 16, 2024	BCL	Review title commitment, and certain sale contracts and other documents relating to Villa Valencia, draft sale motion to address various liens and claims, and emails with S. Ferrera regarding same.	2.00	700.00
July 16, 2024	BCL	Draft buyer's affidavit for Villa Valencia unit.	0.20	70.00
July 16, 2024	BCL	Prepare summary of parties and review documents for service list, and email Y. Castro regarding same.	0.40	140.00

July 16, 2024	BCL	Review and revise Villa Valencia sale contract and exhibits, and email with S. Ferrera regarding same.	0.80	280.00
July 16, 2024	BCL	Review and revise lender settlement terms for Miami Beach, and emails with D. Rosendorf and J. Alderman regarding same.	0.80	280.00
July 16, 2024	BCL	Consider seller payments for potential sale of Miami Beach property, update spreadsheet for same, and emails with S. Ferrera, D. Rosendorf and S. Rothstein regarding same.	0.70	245.00
July 16, 2024	BCL	Call and emails with J. Wang and V. Bonet regarding plans relating to Villa Valencia penthouse.	0.30	105.00
July 17, 2024	BCL	Call with D. Rosendorf to discuss open items for Villa Valencia sale contract and sale motion, lender discussions and related documents, Miami Beach sale contract, potential sale of Commodore, and Miami Beach private sale contract.	1.30	455.00
July 17, 2024	BCL	Draft and revise Miami Beach private sale contract, and emails with S. Ferrera regarding same.	0.50	175.00
July 17, 2024	BCL	Emails with J. Alderman regarding RLC Funding loan transactions.	0.20	70.00
July 17, 2024	BCL	Calls with S. Ferrera, L. Fisher and D. Rosendorf regarding closing costs for Miami Beach and negotiations with potential purchaser.	0.50	175.00
July 18, 2024	BCL	Confirm status of appeal for Stewart sale order, and emails with S. Ferrera, D. Rosendorf and N. Yidi regarding same.	0.30	105.00
July 18, 2024	BCL	Call with D. Rosendorf regarding 1505 Ponce issues, Stewart property, and Villa Valencia.	1.40	490.00
July 18, 2024	BCL	Calls with D. Rosendorf, J. Alderman, R. Gutlohn and L. Fisher regarding Miami Beach sale process, closing costs, fees and related issues, and discuss with D. Rosendorf regarding same.	1.20	420.00

July 18, 2024	BCL	Emails with N. Yidi and review prior emails regarding change of trustee and related documents.	0.20	70.00
July 18, 2024	BCL	Review and revise sale contract, deed, title affidavit and other documents for proposed Commodore sale, and emails with S. Ferrera, D. Rosendorf and potential purchaser regarding same.	2.20	770.00
July 18, 2024	BCL	Review D. Rosendorf's revisions to sale motion, continue to revise and update same, and email S. Ferrera regarding same.	0.80	280.00
July 18, 2024	BCL	Review list of title requirements, draft comments, and emails with S. Ferrera and D. Rosendorf regarding same.	1.20	420.00
July 19, 2024	BCL	Review and update hearing status chart relating to Miami Beach property.	0.20	70.00
July 19, 2024	BCL	Call with S. Ferrera and D. Rosendorf to discuss redlines to Commodore sale contract and exhibits.	0.40	140.00
July 19, 2024	BCL	Analyze closing payments under lender settlement for Stewart sale, prepare spreadsheet for same, and emails with J. Alderman regarding same.	1.20	420.00
July 19, 2024	BCL	Call with M. Solov, D. Dillworth and D. Rosendorf regarding Commodore properties and status of potential sale.	0.40	140.00
July 19, 2024	BCL	Call with S. Ferrera to review title requests and responses to same.	0.40	140.00
July 19, 2024	BCL	Emails with Y. Castro regarding certified copy of Stewart sale order.	0.10	35.00
July 19, 2024	BCL	Emails with D. Rosendorf regarding RLC loan for Villa Valencia.	0.10	35.00
July 22, 2024	BCL	Call with D. Rosendorf to discuss Miami Beach, Commodore, Los Pinos and Stewart properties and related issues and next steps.	0.50	175.00
July 22, 2024	BCL	Emails with D. Rosendorf and other	0.30	105.00

Date	Code	Description	Rate	Amount
		parties regarding Los Pinos and listing issue.		
July 22, 2024	BCL	Review M. Claire's report for auction of 299 Alhambra personal property.	0.20	70.00
July 22, 2024	BCL	Discuss with R. Neary regarding Villa Valencia and appraiser visit for 1202 and inspections for 1101.	0.30	105.00
July 22, 2024	BCL	Emails with potential purchaser for Villa Valencia unit regarding status of sale contract review, inspections and buyer's affidavit.	0.30	105.00
July 22, 2024	BCL	Calls with L. Fisher, R. Gutlohn, and D. Rosendorf regarding Miami Beach property and potential sale, and Los Pinos bankruptcy.	0.60	210.00
July 22, 2024	BCL	Email with T. Lehman regarding appraiser and unit 1201.	0.10	35.00
July 22, 2024	BCL	Emails with F. Touron regarding notice relating to Commodore property and call to discuss same.	0.10	35.00
July 22, 2024	BCL	Emails with S. Silver regarding Commodore properties and related transactions.	0.10	35.00
July 22, 2024	BCL	Draft Miami Beach sale motion for private sale, and email D. Rosendorf regarding same.	1.80	630.00
July 23, 2024	BCL	Call with D. Rosendorf regarding Miami Beach sale motion and related items, and discovery items.	0.40	140.00
July 23, 2024	BCL	Emails with interested party regarding Villa Valencia unit, diligence items, and sale contract comments, and emails with S. Ferrera regarding same.	0.40	140.00
July 23, 2024	BCL	Call with L. Fisher regarding Miami Beach negotiations with lender and related issues.	0.30	105.00
July 23, 2024	BCL	Review certain documents and information for Villa Valencia units, and call and email with C. Gobel regarding same.	0.80	280.00
July 23, 2024	BCL	Call and emails with S. Ferrera and K. Wendzel regarding title	0.80	280.00

		requirements for real property sales.		
July 23, 2024	BCL	Review spreadsheet relating to Los Pinos indebtedness and potential sale scenarios, and discuss with D. Rosendorf.	0.50	175.00
July 23, 2024	BCL	Call with R. Gutlohn, J. Alderman and D. Rosendorf to discuss Miami Beach property, sale contract and settlement terms.	0.40	140.00
July 23, 2024	BCL	Draft lender's declaration for Miami Beach sale motion.	0.30	105.00
July 23, 2024	BCL	Draft revised lender settlement terms for Miami Beach private sale.	0.70	245.00
July 23, 2024	BCL	Review documents and update mortgage and lien section in Miami Beach sale motion.	0.60	210.00
July 23, 2024	BCL	Review recorded liens and claims, pending litigation, investors and other parties for service list for Miami Beach sale motion, and email Y. Castro regarding same.	1.60	560.00
July 23, 2024	BCL	Review listing agreement for Villa Valencia unit 1301, and emails with S. Ferrera regarding same.	0.90	315.00
July 23, 2024	BCL	Emails with J. Rosen regarding appraiser access for Villa Valencia unit 1201, and discuss same with R. Neary.	0.30	105.00
July 23, 2024	BCL	Email M. Raymond regarding Villa Valencia breakdown and additional information, and review same.	0.10	35.00
July 24, 2024	BCL	Draft proposed order for Miami Beach sale motion.	0.80	280.00
July 24, 2024	BCL	Emails with N. Zeher regarding status of yacht sale.	0.10	35.00
July 24, 2024	BCL	Emails with potential purchaser and S. Ferrera regarding Villa Valencia unit, and proposed changes to sale contract.	0.40	140.00
July 24, 2024	BCL	Review and revise Commodore sale motion, and review related documents for same.	0.80	280.00
July 24, 2024	BCL	Consider service parties for	1.70	595.00

Date	Party	Description	Hours	Amount
		Commodore sale motion, and prepare list of same.		
July 24, 2024	BCL	Revise Commodore sale order to provide background, analysis and conclusion sections, and review potential purchaser's redlines to same.	2.20	770.00
July 24, 2024	BCL	Emails with S. Silver regarding call to discuss certain Commodore properties.	0.10	35.00
July 24, 2024	BCL	Consider service issue for Villa Valencia sale motion, and review public records and update service list.	0.50	175.00
July 24, 2024	BCL	Call with S. Ferrera, D. Samole and D. Rosendorf regarding potential purchaser's remaining redlines to Commodore sale contract.	0.40	140.00
July 24, 2024	BCL	Call with N. Yidi and J. Rodriguez regarding closing items for Stewart property.	0.20	70.00
July 24, 2024	BCL	Review potential purchaser's revisions to lease assignment, and emails with D. Rosendorf, D. Samole and S. Ferrera regarding same.	0.20	70.00
July 25, 2024	BCL	Call with D. Rosendorf to discuss Miami City hearing for Commodore code violation, and Miami Beach sale motion.	0.30	105.00
July 25, 2024	BCL	Draft and revise lender's declaration for Miami Beach sale motion, and email J. Alderman and R. Gutlohn regarding same.	0.60	210.00
July 25, 2024	BCL	Consider L. Fisher declaration for Miami Beach sale motion, prepare draft, and email L. Fisher regarding same.	0.80	280.00
July 25, 2024	BCL	Emails with AT&T and S. Ferrera regarding requests relating to proposal for undergrounding work.	0.20	70.00
July 25, 2024	BCL	Emails with J. Alderman, R. Gutlohn and L. Gutlohn regarding Stewart sale closing and lender payment items.	0.20	70.00

July 25, 2024	BCL	Attend to closing statement and amounts to be paid at closing, update spreadsheet for same, and call and emails with S. Ferrera and J. Rodriguez regarding same	1.20	420.00
July 25, 2024	BCL	Review proposed changes for lease assignment, and emails with S. Ferrera regarding same.	0.10	35.00
July 25, 2024	BCL	Emails with S. Ferrera regarding inquiries from potential purchaser for Villa Valencia unit.	0.10	35.00
July 25, 2024	BCL	Call with S. Silver and D. Rosendorf regarding repurchase issues and potential purchaser for Commodore properties.	0.40	140.00
July 25, 2024	BCL	Call with potential purchaser, counsel and D. Rosendorf regarding open items for Commodore properties, and emails with S. Ferrera regarding same.	0.60	210.00
July 26, 2024	BCL	Review information for lender payment, closing statement and closing documents, and emails with S. Ferrera, T. Tolentino, J. Alderman, N. Yidi and J. Rodriguez regarding same.	1.20	420.00
July 26, 2024	BCL	Email G. Ceballos regarding AT&T proposal for Villa Valencia and payment.	0.10	35.00
July 26, 2024	BCL	Emails with interested party regarding 299 Alhambra building.	0.20	70.00
July 29, 2024	BCL	Stewart property site visit for final walk through with buyer prior to closing.	1.70	595.00
July 29, 2024	BCL	Emails with S. Ferrera, J. Hernandez, N. Yidi and A. Almazan regarding remaining closing items, documents and wires, attend to final closing statement, and call with J. Hernandez to discuss lien.	1.00	350.00
July 29, 2024	BCL	Review and revise Commodore sale contract, motion, proposed order and assignment, review comments for same, and emails with S. Ferrera and D. Rosendorf regarding same.	1.60	560.00

July 29, 2024	BCL	Review and revise changes to Villa Valencia sale contract, and emails with interested party and S. Ferrera regarding same.	0.80	280.00
July 29, 2024	BCL	Review potential purchaser's comments to Miami Beach sale contract, and call with D. Rosendorf and S. Ferrera to discuss same.	0.90	315.00
July 30, 2024	BCL	Emails with N. Yidi and J. Rodriguez regarding utilities, keys and codes for Stewart property, and prepare package for courier.	0.30	105.00
July 30, 2024	BCL	Review lender's bill for Stewart, call and emails with J. Alderman regarding same, and email D. Rosendorf regarding open issues.	0.60	210.00
July 30, 2024	BCL	Calls with counsel for potential purchaser, J. Alderman, R. Gutlohn, S. Ferrera and D. Rosendorf regarding Miami Beach property.	0.60	210.00
July 30, 2024	BCL	Calculate Stewart property net proceed wires and amounts for carveout, lender fee reserve and lien claim fund, and email C. Herskowitz regarding same.	0.80	280.00
July 30, 2024	BCL	Email with F. Schwartz regarding interested party and broker for Miami Beach, and call with L. Fisher regarding same.	0.20	70.00
July 31, 2024	BCL	Emails with potential purchaser, S. Ferrera and R. Neary regarding Villa Valencia sale contract and changes, inspections and related items.	1.00	350.00
July 31, 2024	BCL	Review preliminary title for Commodore parcels, and emails and call with S. Ferrera regarding same.	0.70	245.00
July 31, 2024	BCL	Emails with K. Wendzel and S. Ferrera regarding Miami Beach title commitment and related issues, and emails with Y. Castro regarding additional service parties.	0.80	280.00
July 31, 2024	BCL	Provide comments for J. Wang for Villa Valencia listing agreement, and email S. Ferrera regarding same.	0.30	105.00

July 31, 2024	BCL	Draft and revise Miami Beach sale motion and proposed order, review D. Rosendorf's comments for motion, and consider lender amounts for same.	1.80	630.00
August 1, 2024	BCL	Emails with purchaser for Villa Valencia unit and S. Ferrera regarding sale contract, signed version and updates.	0.20	70.00
August 1, 2024	BCL	Review emails, account and information relating to FPL bill for Villa Valencia, and emails with S. Ferrera and R. Neary regarding same.	0.40	140.00
August 1, 2024	BCL	Attend to water meter, FPL account, and police report for missing meter for Stewart property, and emails with T. Lopez, N. Yidi, Y. Castro and R. Neary regarding same.	0.40	140.00
August 1, 2024	BCL	Review recorded lease and related UCC for Miami Beach property, and email F. Saint-Remy and S. Ferrera regarding same.	0.30	105.00
August 1, 2024	BCL	Draft and revise Miami Beach sale motion and order to address prior leases and other items, and review updated service list.	0.70	245.00
August 1, 2024	BCL	Review letter for stolen floating water meter, and emails with Y. Castro regarding same.	0.20	70.00
August 1, 2024	BCL	Revise Commodore sale order and review D. Rosendorf's comments to same, and emails with potential purchaser's counsel, D. Rosendorf and S. Ferrera regarding same.	0.70	245.00
August 1, 2024	BCL	Draft and revise Villa Valencia sale motion.	1.50	525.00
August 2, 2024	BCL	Emails with purchaser for certain Villa Valencia unit and S. Ferrera regarding deposit and underwriting items.	0.30	105.00
August 2, 2024	BCL	Draft Villa Valencia sale motion and emails with D. Rosendorf regarding same.	1.80	630.00

August 2, 2024	BCL	Review records for certain emails relating to Villa Valencia unit, and email D. Rosendorf regarding same.	0.50	175.00
August 2, 2024	BCL	Review documents relating to yacht, and emails with R. O'Brien and N. Zeher regarding same.	0.20	70.00
August 2, 2024	BCL	Discussions with R. Neary regarding Villa Valencia unit inspection.	0.20	70.00
August 2, 2024	BCL	Emails with D. Rosendorf regarding updated invoice for lender's fees for Stewart property.	0.10	35.00
August 5, 2024	BCL	Review and revise listing agreement, and emails with S. Ferrera and J. Wang regarding same.	0.30	105.00
August 5, 2024	BCL	Emails with interested parties for Villa Valencia units.	0.20	70.00
August 5, 2024	BCL	Emails and calls with L. Fisher, D. Rosendorf and F. Schwartz regarding R. Kapoor contacting broker.	0.50	175.00
August 5, 2024	BCL	Draft Villa Valencia unit 1104 proposed sale order, review comments from D. Rosendorf and S. Ferrera regarding same, and prepare clean version.	3.20	1,120.00
August 5, 2024	BCL	Call and emails with D. Rosendorf, J. Alderman and bankers regarding wire for payment of lender fees from Stewart lender fee fund.	0.40	140.00
August 5, 2024	BCL	Zoom meeting with V. Bonet to review Google Workspace shared drives and files for Commodore properties, and emails with R. Neary regarding compiling same.	1.30	455.00
August 5, 2024	BCL	Review blighted structure form for Commodore parcel, and email R. Penalver regarding updates.	0.20	70.00
August 5, 2024	BCL	Review and revise Commodore sale order, and D. Samole's comments to same, and emails with potential purchaser and counsel regarding same.	0.30	105.00

August 5, 2024	BCL	Review D. Rosendorf's revisions to Commodore sale motion, and prepare updated version.	0.30	105.00
August 5, 2024	BCL	Review and revise Villa Valencia unit 1104 sale motion and related documents, review D. Rosendorf's revisions, and prepare clean version.	1.20	420.00
August 5, 2024	BCL	Review service parties, draft service list and related documents for Villa Valencia unit 1104 sale motion, and emails with Y. Castro regarding same.	0.80	280.00
August 5, 2024	BCL	Review updated title commitment for Villa Valencia unit 1104, and emails with counsel for title company and S. Ferrera regarding same.	0.50	175.00
August 6, 2024	BCL	Call and emails with D. Rosendorf, S. Ferrera and counsel for potential purchaser regarding Commodore lease assignment.	0.70	245.00
August 6, 2024	BCL	Call and emails with D. Rosendorf, S. Ferrera and purchaser for Villa Valencia unit 1104 and inspection issues, and conference call with purchaser regarding same.	1.00	350.00
August 6, 2024	BCL	Attend to Stewart lender fee fund and disbursement of remaining funds, and emails with S. Villalobos, C. Herskowitz, and J. Alderman regarding same.	0.50	175.00
August 6, 2024	BCL	Draft and revise Commodore sale motion, and email counsel for potential purchaser regarding same.	0.70	245.00
August 6, 2024	BCL	Emails with G. Ceballos, S. Ferrera and D. Rosendorf regarding AT&T proposal for Villa Valencia and payment for same.	0.20	70.00
August 6, 2024	BCL	Emails and call with J. Wang regarding Villa Valencia unit 1301 and listing agreement, and email S. Ferrera regarding same.	0.30	105.00
August 7, 2024	BCL	Call with D. Rosendorf to discuss Los Pinos, Miami Beach, Villa Valencia unit 1104 and other open items.	0.50	175.00

August 7, 2024	BCL	Call and emails with L. Fisher regarding Miami Beach and interested parties.	0.20	70.00
August 7, 2024	BCL	Call with interested party regarding Villa Valencia unit 1104.	0.20	70.00
August 7, 2024	BCL	Attend to AT&T letter agreement for Villa Valencia work, and emails with A. Sanchez and G. Ceballos regarding same.	0.50	175.00
August 7, 2024	BCL	Call and emails with M. Pember regarding Stewart property permit issue, and email N. Yidi regarding same.	0.20	70.00
August 7, 2024	BCL	Call with C. Gobel and D. Rosendorf regarding Villa Valencia appraisals.	0.40	140.00
August 7, 2024	BCL	Calls and emails with J. Wang regarding Villa Valencia unit 1301 and list price, attend to listing agreement, and call with D. Rosendorf to discuss same.	0.80	280.00
August 7, 2024	BCL	Call with J. Alderman, R. Gutlohn and D. Rosendorf to discuss Miami Beach property.	0.30	105.00
August 7, 2024	BCL	Emails with K. Wendzel regarding title and sale process for Villa Valencia unit 1104.	0.20	70.00
August 7, 2024	BCL	Consider modified terms for Villa Valencia unit 1104 sale contract and revise same, and emails and calls and emails with S. Ferrera and D. Rosendorf regarding same.	1.20	420.00
August 7, 2024	BCL	Emails with A. Chinchilla and D. Rosendorf regarding review of certain emails in certain account, and new attorney name.	0.40	140.00
August 7, 2024	BCL	Calls with J. DeCarlo and D. Rosendorf regarding Montana property, list price and other properties.	0.40	140.00
August 7, 2024	BCL	Revise Villa Valencia unit 1104 sale motion and order to account for updated terms and title company's comments, and email D. Rosendorf regarding same.	1.70	595.00

August 8, 2024	BCL	Review and revise Villa Valencia unit 1104 sale contract to address additional items, revise sale motion and order for same, and emails with S. Ferrera regarding same.	0.70	245.00
August 8, 2024	BCL	Review updated service list for Villa Valencia unit 1104 sale motion and related information, and emails with Y. Castro and K. Wendzel regarding same.	0.70	245.00
August 8, 2024	BCL	Review and respond to J. Maduro email regarding 299 Alhambra.	0.10	35.00
August 8, 2024	BCL	Review potential purchaser's revisions to Commodore sale order, prepare updated version, and email with counsel regarding same.	0.50	175.00
August 8, 2024	BCL	Call with D. Rosendorf, F. Schwartz, L. Salazar and I. Marcushamer regarding Los Pinos.	0.50	175.00
August 8, 2024	BCL	Attend to invoice for Montana property, and email C. Herskowitz regarding same.	0.10	35.00
August 9, 2024	BCL	Consider proposed order and sale status for 299 Alhambra, and emails with P. Humbert and J. Maduro regarding same.	0.60	210.00
August 9, 2024	BCL	Review various emails on status of Commodore sale and title documents, and email S. Ferrera regarding open items.	0.40	140.00
August 9, 2024	BCL	Revise and review comments for Villa Valencia unit 1104 sale motion and order, and emails with D. Rosendorf regarding same.	0.70	245.00
August 9, 2024	BCL	Emails with Y. Castro regarding Villa Valencia unit 1104 sale motion, order and exhibits.	0.20	70.00
August 9, 2024	BCL	Emails with purchaser regarding buyer's affidavit for Villa Valencia unit 1104.	0.20	70.00
August 9, 2024	BCL	Call and emails with potential purchaser, counsel and D. Rosendorf regarding Commodore sale terms and S. Silver, and email S. Ferrera regarding same.	0.60	210.00

August 9, 2024	BCL	Call with C. Gobel and D. Rosendorf regarding Villa Valencia 1301 and related issues, and prepare notes for same.	0.50	175.00
August 9, 2024	BCL	Emails with R. O'Brien, F. Schwartz, M. Raymond, and J. Alderman regarding Villa Valencia unit 1104 sale motion, order and exhibits.	0.30	105.00
August 9, 2024	BCL	Consider status of attorney document review for certain email account, update chart, and emails with A. Garcia and F. Saint-Remy regarding reviewed and next batches.	0.80	280.00
August 12, 2024	BCL	Emails with Y. Castro and D. Rosendorf regarding no trespass signs for certain Commodore buildings.	0.30	105.00
August 12, 2024	BCL	Review appraisals for Villa Valencia unit and update notes for same.	0.50	175.00
August 12, 2024	BCL	Call with potential purchaser regarding Commodore properties, and email S. Ferrera regarding same.	0.40	140.00
August 12, 2024	BCL	Email S. Rothstein regarding Miami Beach City statements.	0.10	35.00
August 12, 2024	BCL	Emails with A. Puebla regarding poles for Villa Valencia AT&T works, and call with V. Bonet regarding same.	0.30	105.00
August 12, 2024	BCL	Email with R. Neary regarding certain documents for potential purchaser for Commodore properties, and call with V. Bonet regarding same.	0.20	70.00
August 12, 2024	BCL	Discussions with D. Rosendorf and B. Sadowsky regarding notice of appeal filed by Halpern Trust for Stewart property.	1.00	350.00
August 13, 2024	BCL	Call with R. Gutlohn, D. Rosendorf and J. Alderman regarding Los Pinos, Miami Beach, and Villa Valencia unit 1104.	0.50	175.00
August 13, 2024	BCL	Review and revise Miami Beach sale contract, and calls and emails	1.00	350.00

Date	Category	Description	Hours	Amount
		with S. Ferrera and D. Rosendorf regarding same.		
August 13, 2024	BCL	Analyze documents relating to Villa Valencia transactions and HFT, and prepare spreadsheet for same.	1.60	560.00
August 14, 2024	BCL	Review documents and information regarding Villa Valencia lender funding and payment information, and calls and emails with D. Rosendorf to discuss same.	1.20	420.00
August 14, 2024	BCL	Review documents and files relating to Commodore, and emails with F. Saint-Remy and potential purchaser regarding adding same to data room.	0.80	280.00
August 14, 2024	BCL	Meeting with J. Wang at Villa Valencia to view property and unit.	1.20	420.00
August 14, 2024	BCL	Site visit to view certain FPL poles for Villa Valencia, call V. Bonet regarding same, and email A. Puebla regarding same.	0.50	175.00
August 14, 2024	BCL	Call with M. Raymond, R. Hyman, M. Halpern and D. Rosendorf regarding Stewart, Villa Valencia and Commodore properties.	1.20	420.00
August 14, 2024	BCL	Call and emails with purchaser for Villa Valencia unit 1104.	0.20	70.00
August 14, 2024	BCL	Call with D. Rosendorf for follow up discussion regarding Stewart, Villa Valencia and Commodore properties following call with M. Halpern and counsel.	0.40	140.00
August 15, 2024	BCL	Review and revise addendum for Villa Valencia unit 1104 sale contract, and emails and call with purchaser regarding same.	0.80	280.00
August 15, 2024	BCL	Call with prospective purchaser, counsel and D. Rosendorf regarding Commodore properties and updates.	0.40	140.00
August 15, 2024	BCL	Call with C. Gobel and D. Rosendorf regarding Villa Valencia unit 1301 and active listing.	0.30	105.00
August 15, 2024	BCL	Emails and call with L. Fisher regarding Miami Beach property and interested parties.	0.20	70.00

August 15, 2024	BCL	Emails with J. Alderman and S. Rothstein regarding Miami Beach property.	0.20	70.00
August 15, 2024	BCL	Review shared files for files relating to Villa Valencia unit 1301, draft mapping of subfiles, and email R. Neary regarding retrieving files.	0.60	210.00
August 15, 2024	BCL	Draft and revise Villa Valencia unit 1104 sale motion and proposed order, and emails with D. Rosendorf and M. Raymond regarding same.	1.00	350.00
August 15, 2024	BCL	Revise and prepare updated versions of Commodore sale contract and lease agreement, and emails with D. Rosendorf, potential purchaser and counsel regarding same.	0.70	245.00
August 16, 2024	BCL	Review Villa Valencia FPL street light documents and emails from FPL, and email S. Ferrera regarding same.	0.20	70.00
August 16, 2024	BCL	Review Miami Beach City statements and other documents to prepare for call with S. Rothstein.	0.80	280.00
August 16, 2024	BCL	Emails with purchaser for Villa Valencia unit 1104 regarding status of motion and order.	0.10	35.00
August 16, 2024	BCL	Call with S. Rothstein to discuss Miami Beach City statements for Miami Beach parcels and next steps, and email summary for potential purchaser and lender.	1.60	560.00
August 16, 2024	BCL	Prepare summary of Miami Beach tenant search list, and emails with R. Neary regarding same.	0.40	140.00
August 19, 2024	BCL	Review emails and photos from R. Neary regarding certain Commodore properties, and communicate with vendor regarding same.	0.30	105.00
August 19, 2024	BCL	Emails with N. Zeher and R. O'Brien regarding closed sale for yacht, and review certain documents for same.	0.20	70.00
August 19, 2024	BCL	Coordinate photographer for Villa	0.10	35.00

August 19, 2024	BCL	Valencia 1301 with R. Neary and J. Wang. Calls with D. Rosendorf and J. Alderman regarding Villa Valencia unit 1104 sale motion and order, and emails with M. Raymond and R. O'Brien regarding same.	0.60	210.00
August 19, 2024	BCL	Compile photos, plans, and other files relating to Villa Valencia unit 1301, and emails and calls with J. Wang, F. Saint-Remy and Y. Castro regarding same and share file.	1.60	560.00
August 19, 2024	BCL	Call with P. Studl regarding Commodore school parcel and related issues.	0.30	105.00
August 19, 2024	BCL	Call with J. Govin, R. Gutlohn and D. Rosendorf regarding Miami Beach property.	0.50	175.00
August 19, 2024	BCL	Emails with Y. Castro regarding exhibits for Villa Valencia unit 1104 sale motion.	0.10	35.00
August 19, 2024	BCL	Review service list for Miami Beach sale motion, and provide comments for same.	0.30	105.00
August 19, 2024	BCL	Call with S. Ferrera to address Commodore condos, Miami Beach sale contract and Villa Valencia unit 1104.	0.30	105.00
August 20, 2024	BCL	Draft provisions to address Miami Beach City statements and category of charges for Miami Beach sale motion.	2.20	770.00
August 20, 2024	BCL	Consider updated settlement terms for lender for Miami Beach property, and update spreadsheet for sale proceeds disbursements, and draft same for sale motion.	0.80	280.00
August 20, 2024	BCL	Draft Miami Beach sale motion and proposed order for same, and email D. Rosendorf regarding same.	1.30	455.00
August 20, 2024	BCL	Review title commitment for Miami Beach property, update the sale motion and proposed order for same, and email K. Wendzel and S. Ferrera regarding same.	1.20	420.00
August 20, 2024	BCL	Emails with counsel for R. Kapoor regarding Villa Valencia unit 1104 sale motion.	0.10	35.00

August 21, 2024	BCL	Emails with F. Schwartz regarding Villa Valencia sale motion.	0.10	35.00
August 21, 2024	BCL	Review exhibits and finalize Villa Valencia unit 1104 sale motion and proposed order, and emails and calls with Y. Castro regarding same, email content for proposed order and service items.	0.70	245.00
August 21, 2024	BCL	Emails with S. Villalobos regarding sending filed Villa Valencia unit 1104 sale motion to S. Ferrera, G. Mars, K. Wendzel and buyer.	0.30	105.00
August 21, 2024	BCL	Emails with J. DeCarlo regarding Montana property showings.	0.10	35.00
August 21, 2024	BCL	Review documents relating to prior tenants for Miami Beach and R. Neary's summary of same, and prepare summary and documents for S. Rothstein to update City statements.	1.00	350.00
August 21, 2024	BCL	Calls with D. Rosendorf to discuss Commodore sale motion, Miami Beach sale motion and order, and Villa Valencia unit 1301.	0.40	140.00
August 21, 2024	BCL	Calls with J. Wang to discuss photos and other materials for Villa Valencia unit 1301.	0.20	70.00
August 22, 2024	BCL	Review D. Rosendorf's revisions and comment to Miami Beach sale motion and order, prepare clean version and emails with D. Rosendorf regarding same.	0.70	245.00
August 22, 2024	BCL	Emails with J. Alderman and counsel for potential purchaser of Miami Beach sale motion and order, and status of sale contract.	0.20	70.00
August 22, 2024	BCL	Review certain court filings in Martini case relating to Villa Valencia, and emails with T. Lehman regarding same.	0.50	175.00
August 22, 2024	BCL	Site visit to Commodore to review certain property and fences, and discuss with vendor.	0.80	280.00
August 22, 2024	BCL	Review form letter from S. Rothstein for Miami Beach City	0.30	105.00

Date	Code	Description	Hours	Amount
		charges, and prepare draft of content for same.		
August 22, 2024	BCL	Call with A. Almazan and N. Yidi regarding Stewart property and recent notice of appeal.	0.30	105.00
August 23, 2024	BCL	Review insurance documents relating to Commodore parcels, update notes for same, and email M. Sanchez regarding notice relating to Urbin Commodore Residential II SPE.	0.60	210.00
August 26, 2024	BCL	Meeting with R. O'Brien and D. Rosendorf to discuss appeal of Stewart sale order and related issues.	0.60	210.00
August 26, 2024	BCL	Calls with R. Gutlohn, D. Rosendorf and L. Fisher regarding Miami Beach property and related issues.	0.60	210.00
August 26, 2024	BCL	Review documents relating to R. Cole and Villa Valencia bond claim, and calls with T. Lehman, G. Martini and D. Rosendorf regarding same.	1.20	420.00
August 26, 2024	BCL	Call and emails with Y. Castro and D. Rosendorf regarding hearing for Villa Valencia unit 1104 hearing and serving same.	0.20	70.00
August 26, 2024	BCL	Review various emails from K. Wendzel regarding title for Commodore, and email S. Ferrera regarding same.	0.20	70.00
August 27, 2024	BCL	Review revisions to Miami Beach sale contract, bill of sale, title affidavit and deed, and emails with S. Ferrera and counsel for potential purchaser regarding same.	0.80	280.00
August 27, 2024	BCL	Revise lender's declaration for Miami Beach sale motion, and email J. Alderman and R. Gutlohn regarding same, sale motion and order.	0.30	105.00
August 27, 2024	BCL	Call with D. Rosendorf to discuss Villa Valencia units and hearing on sale motion for unit 1104.	0.20	70.00
August 27, 2024	BCL	Emails with potential purchaser for Commodore properties regarding	0.20	70.00

		sale contract and related agreement with third party.		
August 27, 2024	BCL	Review title commitment for Commodore properties, update sale motion to address to list liens and claims, and prepare summary of open items for S. Ferrera.	1.80	630.00
August 27, 2024	BCL	Emails with M. Suarez regarding site visit for Commodore condo building with city appraiser, and call with Y. Castro regarding same.	0.20	70.00
August 27, 2024	BCL	Communicate with vendor regarding work done for Commodore building to prevent access.	0.20	70.00
August 27, 2024	BCL	Review emails regarding hearing for City violation order, and emails with potential purchaser for Commodore properties regarding same.	0.20	70.00
August 27, 2024	BCL	Call with M. Boschetti and D. Rosendorf regarding Los Pinos updates, and discuss with D. Rosendorf.	0.50	175.00
August 27, 2024	BCL	Call with J. Wang and D. Rosendorf regarding Villa Valencia 1301 and list price.	0.50	175.00
August 27, 2024	BCL	Review association information for Villa Valencia, and email J. Wang regarding ledger for unit 1301.	0.30	105.00
August 28, 2024	BCL	Commodore properties site visit with Y. Castro to address signs and review additional access prevention measures taken for school building, and meeting with M. Suarez city appraiser for condo building walk through.	1.50	525.00
August 28, 2024	BCL	Calls with D. Rosendorf to discuss Los Pinos, Villa Valencia unit 1104 hearing and cancelation, M. Sengsourinh access request, Commodore condo units legal description and folio issues, and other open items.	0.50	175.00
August 28, 2024	BCL	Emails with R. Neary regarding Commodore condo building access for M. Sengsourinh.	0.10	35.00

August 28, 2024	BCL	Draft Villa Valencia sale contract form for J. Minsker for unit 1202, and emails with J. Minsker regarding same.	0.80	280.00
August 28, 2024	BCL	Review update from counsel for potential purchaser regarding Commodore properties, and discuss pending items with S. Ferrera.	0.20	70.00
August 29, 2024	BCL	Review filings for appeal of Stewart sale order, and emails with V. Villalobos, D. Rosendorf and B. Sadowsky regarding same.	0.40	140.00
August 29, 2024	BCL	Review and revise certificate of interested parties for appeal of Stewart sale order, and related documents and lists for same, and emails with D. Rosendorf and B. Sadowsky regarding same.	1.00	350.00
August 29, 2024	BCL	Draft and revise Commodore sale motion, service list and proposed order, review title commitment and comments from S. Ferrera regarding same, and emails with K. Wendzel, S. Ferrera, and proposed purchaser and counsel for purchaser regarding same.	2.50	875.00
August 29, 2024	BCL	Call and emails with J. Wang regarding information relating to Villa Valencia 1301.	0.20	70.00
August 29, 2024	BCL	Review Villa Valencia unit 1104 sale order, call with D. Rosendorf to discuss, and emails with S. Ferrera, Y. Castro and N. Garcia regarding same,	0.50	175.00
August 30, 2024	BCL	Emails with counsel for potential purchaser, S. Ferrera and J. Alderman regarding Miami Beach sale contract, access to property and related agreement.	0.40	140.00
August 30, 2024	BCL	Call and email with L. Fisher regarding updated declaration for Miami Beach property and access agreement for potential purchaser.	0.20	70.00
August 30, 2024	BCL	Calls and emails with S. Ferrera regarding Commodore sale contract	0.20	70.00

Date	Code	Description	Hours	Rate
		updates and Miami Beach access agreement.		
August 30, 2024	BCL	Review update checklist and timeline for Villa Valencia unit 1104 sale, and emails with N. Levi regarding closing timeframe.	0.20	70.00
August 30, 2024	BCL	Emails and calls with D. Rosendorf and J. Alderman to discuss Miami Beach and Los Pinos properties and related issues.	0.60	210.00
August 30, 2024	BCL	Review appraisal for Villa Valencia 1301, and emails with C. Gobel regarding same.	0.30	105.00
August 30, 2024	BCL	Emails with J. Wang regarding information and listing agreement for Villa Valencia unit 1301.	0.20	70.00
September 2, 2024	BCL	Review and revise Miami Beach access agreement, and email D. Rosendorf regarding same.	0.30	105.00
September 3, 2024	BCL	Emails with purchaser and J. Govin regarding Miami Beach sale contract, access agreement, and access date.	0.30	105.00
September 3, 2024	BCL	Emails with K. Wendzel and S. Ferrera updates regarding Villa Valencia unit 1104, Miami Beach sale contract, and Commodore sale contract.	0.20	70.00
September 3, 2024	BCL	Compile exhibits for Miami Beach sale motion, emails with L. Fisher and R. Gutlohn regarding declarations for same, and emails with S. Villalobos regarding same.	1.00	350.00
September 3, 2024	BCL	Email R. O'Brien regarding same Miami Beach sale motion and proposed order.	0.10	35.00
September 3, 2024	BCL	Review certificate of interested parties for Stewart sale order appeal, and emails B. Sadowsky and D. Rosendorf regarding same and next steps.	0.30	105.00
September 3, 2024	BCL	Miami Beach site visit to meet buyer's consultant for certain report.	1.20	420.00
September 3, 2024	BCL	Call with D. Rosendorf and M. Boschetti regarding Los Pinos sale status.	0.30	105.00

September 4, 2024	BCL	Calls with D. Rosendorf regarding Villa Valencia unit 1201 and G. Martini terms, Stewart lien claim fund items, and Commodore sale contract and related issues.	0.80	280.00
September 4, 2024	BCL	Review term sheet from G. Martini for Villa Valencia unit 1201, review related information, and consider potential counter proposal and related issues.	0.70	245.00
September 4, 2024	BCL	Call with R. Hyman, F. Armada and D. Rosendorf regarding Stewart sale proceeds, HFT loans and related issues, and review summary of Stewart liens to prepare for same.	1.00	350.00
September 4, 2024	BCL	Discussions with B. Sadowsky and D. Rosendorf regarding items relating to Stewart appeal.	0.30	105.00
September 4, 2024	BCL	Call and emails with J. Wang regarding listing agreement, and update same.	0.30	105.00
September 4, 2024	BCL	Call with T. Lehman and G. Martini regarding Villa Valencia unit 1201 and related issues, and call with D. Rosendorf to discuss same.	0.80	280.00
September 4, 2024	BCL	Review Commodore sale contract for certain provision relating to diligence and third party, and calls and emails with potential purchaser and S. Ferrera regarding same.	0.40	140.00
September 5, 2024	BCL	Calls with D. Rosendorf to discuss timing for Miami Beach sale motion, Commodore sale contract and motion, Stewart lien claim fund, other open items and next steps.	0.80	280.00
September 5, 2024	BCL	Emails with counsel for purchaser for Miami Beach property regarding requests from consultant, and provide responses.	0.30	105.00
September 5, 2024	BCL	Consider additional comments from potential purchaser for Commodore sale contract, review redlines, and calls and emails with D. Rosendorf, said purchaser and S. Ferrera regarding same.	1.30	455.00

September 5, 2024	BCL	Call with R. O'Brien and D. Rosendorf to discuss Los Pinos settlement and sale status, and Miami Beach sale motion.	0.50	175.00
September 5, 2024	BCL	Call with F. Touron regarding liens and other items relating to Winmar.	0.40	140.00
September 5, 2024	BCL	Email F. Schwartz regarding Miami Beach sale motion and exhibits.	0.10	35.00
September 5, 2024	BCL	Emails and call with D. Rosendorf regarding Los Pinos deadline and related issues.	0.10	35.00
September 6, 2024	BCL	Review case docket and transcripts for Stewart appeal, and emails with B. Sadowsky and D. Rosendorf regarding same.	0.30	105.00
September 6, 2024	BCL	Review and revise Commodore sale motion and order, review additional comments from counsel for potential purchaser, and discuss with D. Rosendorf regarding same.	1.40	490.00
September 6, 2024	BCL	Call with counsel for potential purchaser for Commodore regarding additional changes and open items for sale motion and order.	0.40	140.00
September 6, 2024	BCL	Emails with J. Wang regarding listing agreement and marketing for Villa Valencia unit 1301.	0.20	70.00
September 6, 2024	BCL	Emails with J. Govin regarding status of Miami Beach sale motion.	0.10	35.00
September 6, 2024	BCL	Review K. Wendzel's comments to Commodore sale motion and inquiries, update motion to address same, and emails with K. Wendzel, S. Ferrera and counsel for potential purchaser regarding same.	0.80	280.00
September 6, 2024	BCL	Call with Y. Castro to discuss service parties for Commodore sale motion, and email K. Wentzel regarding update for claimant name for title commitment.	0.80	280.00
September 9, 2024	BCL	Emails with F. Schwartz regarding comments for Miami Beach sale motion, emails and call with D. Rosendorf regarding unit purchaser comments regarding same, and	0.50	175.00

		update certificate regarding same.		
September 9, 2024	BCL	Review and revise final versions of Miami Beach sale motion and proposed order, emails with Y. Castro regarding filing and serving same, exhibits and submission of proposed order, and emails with counsel for purchaser regarding same.	1.00	350.00
September 9, 2024	BCL	Review and prepare clean versions of Commodore sale motion and proposed order, and final PDF version of sale contract, and emails with purchaser, counsel for purchaser and R. O'Brien regarding same,	0.90	315.00
September 9, 2024	BCL	Review additional files relating to Commodore properties, and email F. Saint-Remy regarding adding documents to data room for purchaser.	1.70	595.00
September 9, 2024	BCL	Call and emails with J. Wang regarding requested information from appraisal for Villa Valencia unit 1301.	0.20	70.00
September 9, 2024	BCL	Review K. Wentzel's comments to Commodore sale order and revise same, and emails with K. Wentzel, S. Ferrera and counsel for purchaser regarding same.	0.80	280.00
September 9, 2024	BCL	Review notices received from City of Miami Beach, and email D. Rosendorf regarding same.	0.30	105.00
September 9, 2024	BCL	Review tax lien letter for Montana property, and email Y. Castro regarding same.	0.10	35.00
September 10, 2024	BCL	Emails with purchaser for Commodore properties and F. Saint-Remy regarding additional documents and data room.	0.30	105.00
September 10, 2024	BCL	Emails with M. Claire regarding items in showroom for Miami Beach property.	0.10	35.00
September 10, 2024	BCL	Emails with L. Garcia regarding updating webpage with Miami Beach sale motion.	0.20	70.00

September 10, 2024	BCL	Emails with J. Govin, S. Ferrera and L. Fisher regarding filed Miami Beach sale motion.	0.20	70.00
September 10, 2024	BCL	Review updated proposed order for Miami Beach sale motion, revise same, and emails with Y. Castro regarding same.	0.30	105.00
September 10, 2024	BCL	Review Villa Valencia unit 1301 appraisal for pages requested by J. Wang, and emails with H. Wang regarding same.	0.50	175.00
September 10, 2024	BCL	Emails with Y. Castro regarding Commodore sale contract and signature page, and email R. O'Brien regarding same and additional exhibits.	0.40	140.00
September 11, 2024	BCL	Review service list for Commodore sale motion, and documents received relating to Commodore units and deposits, and email Y. Castro regarding reviewing documents and adding parties to service list.	0.80	280.00
September 11, 2024	BCL	Calls with R. O'Brien and D. Rosendorf regarding Miami Beach sale motion and potential objecting party.	0.70	245.00
September 11, 2024	BCL	Call with D. Rosendorf to discuss deposit funds for Miami Beach and Commodore purchasers, and Commodore sale motion and other open items.	0.60	210.00
September 11, 2024	BCL	Review information and settlement communications relating to Halpern parties and Stewart lien claim fund, and email D. Rosendorf regarding same.	0.30	105.00
September 11, 2024	BCL	Calls with D. Rosendorf regarding Commodore discussions with HFT, and Miami Beach sale motion and potential objecting parties.	0.60	210.00
September 11, 2024	BCL	Call and emails with J. Wang and M. Maya regarding Villa Valencia unit 1301 maintenance fees and access.	0.30	105.00
September 11, 2024	BCL	Call with purchaser for Commodore properties and D. Rosendorf	0.40	140.00

		regarding sale motion and updates regarding HFT, landlord entities, and related issues.		
September 14, 2024	BCL	Emails and call with D. Rosendorf regarding discussions with HFT regarding Commodore sale.	0.50	175.00
September 17, 2024	BCL	Review new notices for Miami Beach City violation hearing, and emails with S. Villalobos regarding same.	0.30	105.00
September 17, 2024	BCL	Emails with S. Villalobos and D. Rosendorf regarding filings and hearing in Los Pinos foreclosure case.	0.10	35.00
September 17, 2024	BCL	Emails with Y. Castro regarding unit depositors and service list for Commodore sale motion.	0.20	70.00
September 17, 2024	BCL	Call with D. Rosendorf to discuss unit depositors objections to Miami Beach sale and related issues, discussions with HFT regarding Commodore sale and Los Pinos issues, and call with D. Rosendorf and L. Fisher to discuss Miami Beach items.	1.00	350.00
September 18, 2024	BCL	Review draft stipulation relating to certain escrow funds and bond for Villa Valencia unit, and emails with D. Rosendorf regarding same.	0.30	105.00
September 19, 2024	BCL	Review response to motion to extend stay for Los Pinos, and email comments to D. Rosendorf.	0.50	175.00
September 19, 2024	BCL	Call with D. Rosendorf to discuss Los Pinos motion to extend stay, negotiations with HFT regarding Commodore sale and proposed changes to sale order, and objection filed to Miami Beach sale motion.	0.40	140.00
September 19, 2024	BCL	Review objection to Miami Beach sale motion, and emails with J. Govin regarding same and buyer's representations.	0.40	140.00
September 19, 2024	BCL	Review revised Commodore sale motion and proposed order, and emails with D. Rosendorf regarding same.	0.30	105.00

September 19, 2024	BCL	Emails with D. Rosendorf regarding Flores proposal for Villa Valencia unit 1202.	0.10	35.00
September 20, 2024	BCL	Call with R. O'Brien and D. Rosendorf to discuss changes to Commodore sale motion and order, motion to extend stay for Los Pinos, and objections to Miami Beach sale motion.	0.70	245.00
September 20, 2024	BCL	Emails with Y. Castro regarding serving notice of status conference on Miami Beach motion service list, and review court's order regarding same.	0.10	35.00
September 21, 2024	BCL	Call with D. Rosendorf to discuss upcoming status conference, Commodore sale motion and follow up with buyer.	0.40	140.00
September 22, 2024	BCL	Emails with purchaser for Villa Valencia unit 1104 regarding status of sale and other units.	0.20	70.00
September 22, 2024	BCL	Review various court filings by objecting parties to Miami Beach sale motion, R. Kapoor's response to said objections, and lender's response to motion to extend stay for Los Pinos property.	0.40	140.00
September 22, 2024	BCL	Review broker's summary and updated debt spreadsheet, and emails with D. Rosendorf regarding same.	0.40	140.00
September 23, 2024	BCL	Calls with D. Rosendorf and L. Fisher regarding approval and uses for Miami Beach property.	0.40	140.00
September 23, 2024	BCL	Review outline and other documents to prepare for status conference, and calls with D. Rosendorf for same.	0.80	280.00
September 23, 2024	BCL	Attend status conference scheduled for all pending motions, and debrief with D. Rosendorf.	3.50	1,225.00
September 23, 2024	BCL	Discussions with F. Schwartz, R. Kapoor, J. Alderman and D. Rosendorf regarding Los Pinos issues.	0.20	70.00

September 23, 2024	BCL	Review emails from and Commodore sale contract signed by First American.	0.10	35.00
September 24, 2024	BCL	Review mail received via postal service.	0.60	210.00
September 24, 2024	BCL	Calls with D. Rosendorf to discuss next steps for Commodore sale motion, various pending items and next steps.	0.50	175.00
September 24, 2024	BCL	Call with D. Rosendorf, A. Korge and S. Goldman regarding Commodore sale motion, confer updates and related issues.	0.30	105.00
September 24, 2024	BCL	Review revised Commodore sale motion and order, and emails with D. Rosendorf regarding comments to same.	0.50	175.00
September 24, 2024	BCL	Coordinate access for Villa Valencia for interested party, and emails with D. Rosendorf, M. Maya and R. Gutlohn regarding same.	0.10	35.00
September 24, 2024	BCL	Review Commodore sale motion and sale contract to address S. Goldman concern, and email D. Rosendorf regarding same.	0.20	70.00
September 25, 2024	BCL	Emails with L. Garcia regarding adding Commodore sale motion to receiver's website, and review said website.	0.10	35.00
September 25, 2024	BCL	Call with L. Fisher and D. Rosendorf to discuss preparation for reply to anticipated response objecting to Miami Beach sale motion.	0.30	105.00
September 25, 2024	BCL	Review and revise proposed stipulation relating to termination of Villa Valencia unit 1201 agreement, review related bond documents, and email D. Rosendorf regarding same.	0.80	280.00
September 25, 2024	BCL	Call with D. Rosendorf to discuss Los Pinos property, sale process and related issues.	0.40	140.00
September 26, 2024	BCL	Meeting with broker and relator at Villa Valencia.	0.50	175.00

September 26, 2024	BCL	Call with P. Arias and D. Rosendorf regarding Miami City violation notices and liens for Commodore properties.	0.50	175.00
September 26, 2024	BCL	Obtain information and documents relating to Villa Valencia units, and email D. Rosendorf and relator regarding same.	0.30	105.00
September 26, 2024	BCL	Review Miami Beach letter regarding recertification and reports for Miami Beach property, and email D. Rosendorf regarding same.	0.10	35.00
September 26, 2024	BCL	Email P. Rodas regarding status of release of bond funds for Villa Valencia AT&T work.	0.10	35.00
September 27, 2024	BCL	Call with interested party relating to Villa Valencia units.	0.10	35.00
September 30, 2024	BCL	Compile architectural plans for Villa Valencia units, and email S. Villalobos regarding same.	0.10	35.00
September 30, 2024	BCL	Review service list for Miami Beach sale motion, and emails with potential claimant regarding same, receiver's website and claims process.	0.20	70.00
September 30, 2024	BCL	Emails with J. Wang, D. Rosendorf and R. Neary regarding new property manager and contact information for Villa Valencia.	0.20	70.00
Total for ASSET DISPOSITION			246.30	86,205.00

## CASE ADMINISTRATION

July 1, 2024	BCL	Call and emails with M. Barmat regarding S. Silver and Villa Valencia.	0.30	105.00
July 1, 2024	BCL	Calls and emails with R. Neary and D. Rosendorf regarding Commodore building issues and work.	0.30	105.00
July 1, 2024	BCL	Review documents relating to additional requests by [REDACTED], and emails with F. Saint-Remy and R. Neary regarding same.	0.20	70.00
July 2, 2024	BCL	Review Montana water use application letter, and email J. DeCarlo regarding same.	0.10	35.00
July 2, 2024	BCL	Email S. Pfaff regarding Winmar contract.	0.10	35.00
July 2, 2024	BCL	Emails with R. Neary, F. Saint-Remy and [REDACTED] regarding requests.	0.40	140.00
July 2, 2024	BCL	Discussions with D. Rosendorf regarding Ponce project, email review for certain accounts, and other open items.	0.40	140.00
July 2, 2024	BCL	Email F. Saint-Remy regarding Relatively and certain email account.	0.10	35.00
July 3, 2024	BCL	Review property appraiser forms, and discuss same with R. Neary.	0.20	70.00
July 3, 2024	BCL	Emails with L. Garcia regarding updates to website.	0.20	70.00
July 8, 2024	BCL	Emails with Y. Castro and lender for Miami Beach regarding FPL accounts.	0.10	35.00
July 8, 2024	BCL	Review case dockets and filing status for certain cases, and update litigation chart for same.	0.20	70.00
July 10, 2024	BCL	Review and revise draft motion and proposed order from [REDACTED], and calls and emails with [REDACTED] and D. Rosendorf regarding same.	1.80	630.00

July 10, 2024	BCL	Meeting and email with [REDACTED], [REDACTED] and D. Rosendorf regarding certain email production.	0.40	140.00
July 11, 2024	BCL	Emails with C. Herskowitz and bank representatives regarding ICS statement and report.	0.10	35.00
July 11, 2024	BCL	Emails with [REDACTED] and F. Saint-Remy regarding certain pleadings, email accounts, and production.	0.40	140.00
July 12, 2024	BCL	Consider storage for physical documents, and emails with vendor regarding pickup and delivery.	0.20	70.00
July 12, 2024	BCL	Attend to vendor payments.	0.20	70.00
July 15, 2024	BCL	Call and email with F. Thomas and C. Suarez regarding receivership, Coral Gables Urbin Partners, and status of business operations.	0.50	175.00
July 16, 2024	BCL	Attend to pick up and delivery of bankers boxes from forensic accountant's offices.	0.20	70.00
July 18, 2024	BCL	Review mail received for various entities.	0.50	175.00
July 18, 2024	BCL	Emails with [REDACTED] regarding production.	0.10	35.00
July 19, 2024	BCL	Review and revise standardized accounting report and backup, and emails with C. Herskowitz and Y. Castro regarding same.	1.00	350.00
July 22, 2024	BCL	Consider bankers boxes of recovered documents from 299 Alhambra building and storage, and discuss with R. Neary regarding same and inventory.	0.30	105.00
July 23, 2024	BCL	Attend to tax appraiser's change of address form for Commodore units, Villa Valencia units, and 299 Alhambra.	0.80	280.00
July 23, 2024	BCL	Call with D. Rosendorf and email with [REDACTED] regarding certain litigation against escrow agent.	0.20	70.00
July 23, 2024	BCL	Emails with F. Saint-Remy and [REDACTED] regarding producing certain email account files.	0.20	70.00

July 23, 2024	BCL	Prepare master list for attorneys, review information from E. Rosen, J. Raskin and D. Rosendorf, and email F. Saint-Remy regarding same.	1.50	525.00
July 23, 2024	BCL	Emails with D. Rosendorf and M. Sengsourinh regarding access request for certain Commodore property, and discuss with R. Neary regarding same and access.	0.30	105.00
July 24, 2024	BCL	Review search term results for certain email account, calls and emails with F. Saint-Remy regarding same, and emails with [REDACTED] and [REDACTED] regarding same.	0.80	280.00
July 24, 2024	BCL	Emails with L. Salazar regarding Villa Valencia association meeting.	0.20	70.00
July 24, 2024	BCL	Emails with [REDACTED] regarding certain QuickBooks files.	0.10	35.00
July 24, 2024	BCL	Review various emails regarding bankers boxes delivery for 299 Alhambra files, and emails with R. Neary regarding same.	0.20	70.00
July 24, 2024	BCL	Review various emails regarding secretary of state filing status for related companies and information.	0.30	105.00
July 24, 2024	BCL	Review access request from [REDACTED], and email K. Rin regarding same.	0.10	35.00
July 25, 2024	BCL	Call with [REDACTED] regarding escrow deposits, and call with D. Rosendorf to discuss.	0.70	245.00
July 25, 2024	BCL	Draft and revise second interim report, and emails with Y. Castro and L. Garcia regarding information for same.	2.80	980.00
July 25, 2024	BCL	Emails with K. Rin and [REDACTED] regarding access to certain files.	0.10	35.00
July 29, 2024	BCL	Emails with [REDACTED] and [REDACTED] regarding document production and related issues.	0.30	105.00
July 29, 2024	BCL	Call with [REDACTED] regarding document production procedure.	0.20	70.00

July 30, 2024	BCL	Emails and calls with D. Rosendorf, F. Saint-Remy and [REDACTED] regarding document production, review procedure and related order, and draft letter for same.	1.20	420.00
July 30, 2024	BCL	Consider documents requested and related issues for certain account and draft letter for same, and calls and emails with F. Saint-Remy and D. Rosendorf regarding same.	0.60	210.00
July 30, 2024	BCL	Review D. Rosendorf's comments to second interim report, revise same, and emails with Y. Castro and D. Rosendorf regarding same.	0.70	245.00
July 31, 2024	BCL	Emails with L. Garcia regarding receiver's website updates.	0.20	70.00
July 31, 2024	BCL	Calls and emails with R. Neary, D. Rosendorf and A. Chinchilla regarding document review, and update master list to account for same.	1.20	420.00
August 1, 2024	BCL	Call with D. Rosendorf and R. O'Brien regarding escrow agent litigation.	0.30	105.00
August 1, 2024	BCL	Email R. Neary regarding updates secretary of state filings for certain entities.	0.20	70.00
August 2, 2024	BCL	Prepare for Villa Valencia association meeting, and attend zoom meeting with G. Mars, association board members and S. Ferrera.	1.90	665.00
August 2, 2024	BCL	Review tagged emails for certain law firm, update notes for same, and discuss with F. Saint-Remy and A. Chinchilla.	0.80	280.00
August 5, 2024	BCL	Emails with A. Chinchilla and F. Saint-Remy regarding document review for certain email account.	0.20	70.00
August 8, 2024	BCL	Review certain documents relating to requests from [REDACTED], [REDACTED], and emails with F. Saint-Remy and [REDACTED] regarding same.	0.70	245.00
August 9, 2024	BCL	Review bank statements and emails with C. Herskowitz regarding same.	0.20	70.00

August 9, 2024	BCL	Attend to vendor payment, and email C. Herskowitz regarding same.	0.10	35.00
August 12, 2024	BCL	Emails and call with F. Saint-Remy regarding production for certain email account, and emails with J. Cortez regarding same.	0.20	70.00
August 12, 2024	BCL	Attend to vendor payments, and emails with C. Herskowitz and J. DeCarlo regarding same.	0.20	70.00
August 12, 2024	BCL	Calls with D. Rosendorf and Y. Castro regarding open items and next steps.	0.60	210.00
August 12, 2024	BCL	Review US mail received and provide certain creditor mail to Y. Castro.	0.30	105.00
August 13, 2024	BCL	Call with M. Solov, D. Dillworth and D. Rosendorf regarding Commodore properties and potential sale.	0.40	140.00
August 15, 2024	BCL	Review motion and order to unseal certain documents, and emails with D. Rosendorf and R. O'Brien regarding same.	0.20	70.00
August 15, 2024	BCL	Prepare summary for certain individuals, counsel and attorney lists, review prior emails and documents, update spreadsheet for same, and email ██████ regarding same.	1.40	490.00
August 15, 2024	BCL	Calls with ██████ R. Neary and F. Saint-Remy regarding production and privilege search terms for certain email accounts, and review notes to prepare for same.	1.20	420.00
August 16, 2024	BCL	Consider updates for receiver's website, and emails with L. Garcia and S. Villalobos regarding same.	0.40	140.00
August 19, 2024	BCL	Update attorney communications spreadsheet for certain email account, and emails with F. Saint-Remy and A. Chinchilla regarding next batches for review.	0.30	105.00
August 20, 2024	BCL	Emails with A. Gonzalez regarding Commodore condo association, prior discussions and requested	0.80	280.00

Date	Category	Description	Hours	Amount
		documents, and review prior correspondence.		
August 20, 2024	BCL	Emails with F. Saint-Remy regarding status of production of certain email account.	0.20	70.00
August 21, 2024	BCL	Emails with ██████████ regarding email account for certain individual.	0.10	35.00
August 21, 2024	BCL	Emails with L. Garcia regarding updating receiver's website with Villa Valencia unit 1104 sale motion.	0.20	70.00
August 21, 2024	BCL	Call with ██████████ D. Rosendorf, R. Neary and F. Saint-Remy regarding open items relating to production for certain email accounts.	0.30	105.00
August 21, 2024	BCL	Emails with ██████████ and K. Rin regarding certain accounts and records.	0.20	70.00
August 22, 2024	BCL	Emails with C. Herskowitz regarding transactions for receivership accounts and descriptions for same.	0.20	70.00
August 23, 2024	BCL	Review prior discussions regarding ESI protocol and production items, and emails with ██████████ regarding same.	0.40	140.00
August 23, 2024	BCL	Email and call with Y. Castro regarding Sunbiz filing for subsidiary entity.	0.10	35.00
August 26, 2024	BCL	Review and revise proposed language from ██████████ for counsel for certain parties, and emails with D. Rosendorf, R. Neary and F. Saint-Remy regarding same.	0.60	210.00
August 27, 2024	BCL	Review bank account activity, and call and email with C. Herskowitz regarding same and bookkeeping spreadsheet.	0.20	70.00
August 27, 2024	BCL	Review and update notes for attorney email review for certain email account, and emails with R. Neary, A. Chinchilla and F. Saint-Remy regarding same.	0.80	280.00
August 27, 2024	BCL	Review comments from D. Rosendorf and F. Saint-Remy regarding proposed letter for certain	0.40	140.00

Date	Category	Description	Hours	Rate
		email account users, revise letter, and email ██████ regarding same.		
August 27, 2024	BCL	Emails with M. Sanchez regarding insurance loss control item for Commodore Resi II.	0.20	70.00
August 28, 2024	BCL	Consider issues relating to certain domain names for law firm and production for certain email account, calls and emails with D. Rosendorf, F. Saint-Remy and R. Neary regarding same, review claw back letter, and update notes for same.	2.70	945.00
August 28, 2024	BCL	Consider vendor payment for services relating to Commodore properties, and email C. Herskowitz regarding same.	0.20	70.00
August 29, 2024	BCL	Email L. Garcia regarding receiver's website update.	0.10	35.00
August 30, 2024	BCL	Emails with L. Salazar regarding meeting with Villa Valencia condo association and updates regarding certain units.	0.10	35.00
September 2, 2024	BCL	Consider beneficial owner information reports, review information and form for same, prepare chart of entities and status of Sunbiz filings, and email Y. Castro regarding same.	1.80	630.00
September 2, 2024	BCL	Review pending litigation chart and case docket for certain matters for case management conference status, and update chart for same.	0.30	105.00
September 3, 2024	BCL	Draft motion for status conference and proposed order for same.	1.00	350.00
September 3, 2024	BCL	Call and email with P. Clark, C. Morin and D. Rosendorf regarding Commodore condo building, insurance claims by unit owners, and related issues.	0.50	175.00
September 3, 2024	BCL	Calls with D. Rosendorf to discuss Miami Beach sale, Stewart sale order appeal, Los Pinos time line, and Commodore sale and items relating to investors and call with B. Barakat.	0.80	280.00

September 4, 2024	BCL	Attend to mail received for receivership entities.	0.40	140.00
September 4, 2024	BCL	Emails with M. Sanchez regarding insurance item for certain Commodore property.	0.10	35.00
September 5, 2024	BCL	Review D. Rosendorf's comments on motion for status conference and revise same, and email R. O'Brien regarding same and proposed order.	0.30	105.00
September 5, 2024	BCL	Emails with M. Sanchez regarding insurance items for certain Commodore property.	0.20	70.00
September 6, 2024	BCL	Review case dockets, status and recent filings for additional cases filed against receivership entities or subsidiaries, update spreadsheet for same, and call with D. Rosendorf regarding particular case and contacting counsel.	1.20	420.00
September 9, 2024	BCL	Review insurance reinstatement letter for certain Commodore property, and email M. Sanchez regarding same.	0.10	35.00
September 10, 2024	BCL	Review and revise motion for status conference, and emails with F. Schwartz, Y. Castro and D. Rosendorf regarding same.	0.50	175.00
September 10, 2024	BCL	Review status of review of emails with attorneys for certain email account, update notes for same, and emails with D. Rosendorf, A. Chinchilla, R. Neary and F. Saint-Remy regarding review sets and status, and related items.	1.20	420.00
September 10, 2024	BCL	Review request from [REDACTED] and email K. Rin regarding same.	0.10	35.00
September 18, 2024	BCL	Emails with D. Rosendorf regarding Florida Department of Revenue and letter.	0.10	35.00
September 22, 2024	BCL	Review bookkeeping spreadsheet for receivership accounts, update notes for same, and email D. Rosendorf summary for status conference.	1.00	350.00

September 27, 2024	BCL	Email L. Garcia regarding updating receiver's website with court order.	0.10	35.00
September 30, 2024	BCL	Meeting with Villa Valencia condo board.	0.60	210.00
September 30, 2024	BCL	Prepare for meeting with Villa Valencia condo board, and review notes, emails and documents relating to open items.	0.80	280.00
September 30, 2024	BCL	Call with D. Rosendorf to discuss N. Snyder requests relating to certain Goodkind emails, T. Lehman's stipulation and related issues, and other pending items.	0.30	105.00
Total for CASE ADMINISTRATION			49.80	17,430.00

## CLAIMS ADMINISTRATION AND OBJECTIONS

July 29, 2024	BCL	Email creditor regarding website and claims process.	0.10	35.00
August 2, 2024	BCL	Emails with Y. Castro regarding Stewart lien claimant.	0.10	35.00
August 7, 2024	BCL	Emails with lien claimant for Stewart property lien claim fund.	0.20	70.00
August 22, 2024	BCL	Consider open bills and accounts for FLP and online account, and emails with Y. Castro and L. Gutlohn regarding Miami Beach and Villa Valencia unit 1104 payments.	0.50	175.00
August 22, 2024	BCL	Call and emails with T. Lehman regarding Martini and bond issues relating to Villa Valencia unit.	0.30	105.00
August 22, 2024	BCL	Review and organize mail received from creditors and other parties.	0.50	175.00
September 3, 2024	BCL	Call with B. Barakat and D. Rosendorf regarding Commodore properties, sale and distribution, and related items.	0.60	210.00
September 3, 2024	BCL	Emails with creditor regarding Villa Valencia unit 1104 sale motion and order.	0.10	35.00
September 3, 2024	BCL	Call with J. Tome and D. Rosendorf regarding Miami Beach unit deposit providers, proposed sale, R. Kapoor and deposit and bond issues.	0.40	140.00
September 3, 2024	BCL	Emails with creditor regarding payment inquiry.	0.10	35.00
September 5, 2024	BCL	Call with P. Correra and D. Rosendorf regarding Villa Valencia lien claim and related issues.	0.50	175.00
September 9, 2024	BCL	Email creditor regarding receiver's website and case status.	0.10	35.00
September 9, 2024	BCL	Review insurance claim letter for certain Commodore property, and email D. Rosendorf regarding same.	0.10	35.00
September 11, 2024	BCL	Emails with K. Florio and D. OQuinn regarding escrow funds held as escrow agents and related information.	0.30	105.00

September 30, 2024	BCL	Review escrow agreement, bond and other related documents for Villa Valencia.	1.20	420.00
September 30, 2024	BCL	Draft motion to approve stipulation and proposed order for G. Martini relating to Villa Valencia unit 1201, and emails and call with D. Rosendorf regarding same.	1.10	385.00
September 30, 2024	BCL	Call and emails with T. Lehman regarding stipulation for G. Martini, and motion and proposed order to approve same.	0.60	210.00
Total for CLAIMS ADMINISTRATION AND OBJECTIONS			----- 6.80	2,380.00

# **EXHIBIT B**

KOZYAK TROPIN & THROCKMORTON’S  
TIME ENTRIES

Summary of Professionals And Paraprofessional Time

Attorney Name		Licensed	Hours	Rate	Fee
ALEXA GARCIA CHINCHILLA	Associate	2022	38.20	250.00	9,550.00
BRANDON M. SADOWSKY	Associate	2024	58.60	250.00	14,650.00
CLAYTON J. SCHMITT	Associate	2020	8.30	250.00	2,075.00
DAVID A. SAMOLE	Partner	2002	13.70	350.00	4,795.00
DAVID L. ROSENDORF	Partner	1994	279.10	350.00	97,685.00
FAROLA SAINT REMY	Paralegal	n/a	54.30	150.00	8,145.00
ROBERT NEARY	Of Counsel	2010	76.50	300.00	22,950.00
YAMILE C. CASTRO	Paralegal	n/a	50.50	150.00	7,575.00
Total Hours by Professionals and Paraprofessionals:					579.20
"Blended" Hourly Rate:					289.06
Total Professionals and Paraprofessionals Fees:					167,425.00

\* 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
ALEXA GARCIA CHINCHILLA	2022	0.50	250.00	125.00
BRANDON M. SADOWSKY	2024	58.30	250.00	14,575.00
DAVID A. SAMOLE	2002	13.70	350.00	4,795.00
DAVID L. ROSENDORF	1994	239.60	350.00	83,860.00
ROBERT NEARY	2010	37.10	300.00	11,130.00
YAMILE C. CASTRO	n/a	36.70	150.00	5,505.00
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Total for Category ASSET DISPOSITION		385.90	310.93	119,990.00
-				
ALEXA GARCIA CHINCHILLA	2022	37.70	250.00	9,425.00
BRANDON M. SADOWSKY	2024	0.30	250.00	75.00
CLAYTON J. SCHMITT	2020	8.30	250.00	2,075.00
DAVID L. ROSENDORF	1994	39.50	350.00	13,825.00
FAROLA SAINT REMY	n/a	54.30	150.00	8,145.00
ROBERT NEARY	2010	39.40	300.00	11,820.00
YAMILE C. CASTRO	n/a	13.80	150.00	2,070.00
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Total for Category CASE ADMINISTRATION		193.30	245.40	47,435.00
-				
Grand Total		579.20	289.06	167,425.00

**Summary of Requested Reimbursement of Expenses**  
**for this Application Period Only**  
*(7/1/2024 to 9/30/2024)*

1.	Filing Fees (Notice of Appeal to Clerk of Special Magistrate - Miami Beach).....	\$128.00
2.	Process Service Fees .....	\$149.00
3.	Witness Fees .....	\$0.00
4.	Court Reporter & Transcripts .....	\$0.00
5.	Lien and Title Searches.....	\$0.00
6.	Photocopies and digital images (several mailings to interested parties and lien holders relating to sale motions for Valencia, Miami Beach and Commodore Properties).....	\$5,142.50
7.	Postage .....	\$672.07
8.	Overnight Delivery Charges (includes shipping of 50 boxes to Receiver’s office).....	\$1,411.73
9.	Outside Couriers .....	\$169.20
10.	Long Distance Telephone Charges .....	\$0.00
11.	Travel Expenses (Parking to attend hearings, status conferences and property site visits .....	\$69.75
12.	E-Discovery .....	\$7,850.39
13.	Filing Fees for 2024 Annual Report amendment and Reinstatement of Receivership Entity and affiliate.....	\$427.50
14.	Miscellaneous: .....	\$13,108.16
	(a) Teamwork - \$197.91	
	(b) General liability insurance policy renewal for Commodore Properties - \$1,977.70	
	(c) Google Workspace (hosting) - \$2,318.40	
	(d) Digital Ocean (web hosting) - \$539.97	
	(e) Locksmith (lock replacement and installation at Commodore and Miami Beach Properties and miscellaneous supplies) - \$1,347.51	
	(f) FPL – utilities for Villa Valencia Unit 1104 - \$1,207.48	
	(g) Intuit Quickbooks - \$5,462.67	
	(h) Certified copy of Stewart Grove sale order - \$13.80	
	(i) Signage for Commodore Properties to comply with City of Miami’s violation notice - \$42.72	

**TOTAL EXPENSE REIMBURSEMENT REQUESTED ..... \$29,128.30**

For Professional Services Rendered

re: 5956-102

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

## ASSET DISPOSITION

Date	Code	Description	Hours	Amount
July 1, 2024	YCC	Review email communications re: water leakage at Stewart Grove property and addendum (.1).	0.10	15.00
July 1, 2024	DLR	Confer with B. Lee re Commodore, Stewart properties (.2); further confer with B. Lee and R. Neary re Commodore access for roofer (.1); draft message to S. Silver re prospective Commodore sale (.1); draft message to A. Gonzalez re Commodore property (.1); confer with L. Fisher re Miami Beach offer and potential auction (.3); review buyer revisions to Commodore PSA (.3); confer with B. Lee re Stewart access agreement (.1); exchange messages with A. Gonzalez re Commodore (.2); receive and review messages re assignment of Stewart agreement (.1); exchange messages with P. Humbert re Alhambra summary judgment hearing (.1); confer with B. Lee, D. Samole, S. Ferrara to review Commodore PSA (2.0); further call with potential buyer and counsel re Commodore PSA (.9); confer with B. Lee and Miami Beach buyer counsel (.3); confer with B. Lee and J. Alderman re Miami Beach (1.3); review prior settlement discussions with HFT and exchange messages with B. Lee re same (.3)	6.40	2,240.00
July 1, 2024	DAS	Call with real estate counsel and Receivership team addressing latest edits and issues with Commodore property PSA (2.0); call with buyer side counsel on Commodore property PSA (.8); review follow up correspondence with buyer counsel addressing addendum and related property items on Stewart property (.2)	3.00	1,050.00
July 2, 2024	DLR	Confer with B. Lee and further	3.50	1,225.00

		confer with B. Lee and L. Fisher re Miami Beach sale process (.5); review motion and order re 299 Alhambra in preparation for hearing (.3); exchange messages with P. Humbert and attend hearing on motion for entry of consent summary judgment (.7); exchange messages with potential Commodore buyer (.1); receive and review messages with J. Alderman re Miami Beach estimated payoff (.2); confer with B. Lee and HFT counsel re Valencia, Commodore and Stewart and further confer with B. Lee re same (.8); review draft final judgment in Alhambra state court action, review prior draft final judgment, and draft message to P. Humbert re same (.3); confer with B. Lee re condo association consent to sale (.2); further confer with B. Lee and L. Fisher re Miami Beach sale (.2); receive and review messages re Valencia purchase agreement (.2)		
July 2, 2024	DAS	Review follow up correspondence/attachments on Commodore PSA and related document items such as title matters, PSA redline and other transaction-related due diligence (.5); review follow up correspondence on Stewart property transaction matters from Buyer's counsel and our real estate counsel (.2)	0.70	245.00
July 2, 2024	YCC	Review communications re: roof leak issue at Stewart Grove property and buyer's information (.1).	0.10	15.00
July 3, 2024	DLR	Confer with B. Lee, re Valencia potential unit purchase (.2); confer with B. Lee and J. Alderman re Miami Beach (.4); further confer with J. Alderman re Miami Beach and Villa Valencia (.3); further confer with B. Lee and with L. Fisher re Miami Beach sale process	4.90	1,715.00

		(.7); review Miami Beach foreclosure complaint and loan documents re debt calculation (.5); work on analysis and structure of potential proposal for Miami Beach sale process, draft schedule and memo to B. Lee re same (.9); review revisions to Commodore PSA and draft message to B. Lee re same (1.0); receive and review message and supplemental affidavit from P. Humbert re 299 Alhambra foreclosure (.2); further exchange messages with B. Lee and S. Ferrera re Commodore PSA (.4)		
July 3, 2024	DAS	Review further redlined Commodore Properties PSA; provide comments and edits (.4)	0.40	140.00
July 4, 2024	DAS	Follow up correspondence exchange with real estate counsel and buyer side as to additional Commodore property transaction issues and items, and dealing with other liens and leases (.2)	0.20	70.00
July 4, 2024	DLR	Several conferrals with B. Lee, J. Alderman, B. Gutlohn, L. Fisher re Miami Beach, Valencia and other properties (3.5); receive and review messages re Commodore potential sale (.3)	3.80	1,330.00
July 5, 2024	DAS	Follow up correspondence exchange regarding Commodore Property transaction planning issues with our real estate counsel and receivership team (.2)	0.20	70.00
July 5, 2024	DLR	Receive and review messages re Commodore condo docs (.2); receive and review messages re Commodore purchase price allocation (.1)	0.30	105.00
July 5, 2024	RN	Providing access to Stewart Ave. property for buyer's contractors. Google Vault searches for Commodore Plaza condominium documents (declaration, amendments, etc.). Returning AT&T equipment retrieved from Forum offices.	4.30	1,290.00

July 6, 2024	DLR	Receive and review message from J. Govin re Miami Beach offer (.1); receive and review message from M. Raymond re payoff calculation for Valencia (.2)	0.30	105.00
July 8, 2024	DLR	Review draft appraisals for Valencia units (.3); confer with J. Alderman, B. Gutlohn, L. Fisher, B. Lee re Miami Beach sale (.8); review materials to prepare for Miami Beach code hearing (.5); attend Miami Beach code hearing (1.5); exchange messages with B. Lee re Commodore order (.2); exchange messages with B. Lee re Yacht sale (.1)	3.40	1,190.00
July 8, 2024	DAS	Review proposed PSA exhibits for Commodore property transaction; other emails correspondence with real estate counsel (.5)	0.50	175.00
July 9, 2024	DLR	Review draft order approving Commodore sale (.3); Confer with B. Lee and with prospective Commodore purchaser and counsel re Commodore transaction (.5); further confer with B. Lee re Commodore sale issues (.3); further review notes and documents re Grouper ground lease (.5); confer with J. Alderman re Los Pinos sale efforts (.1); review Agreed Order and draft message to Los Pinos / Kapoor counsel re same (.3); further exchange messages with R. Kapoor and F. Schwartz re same (.2)	2.20	770.00
July 9, 2024	DAS	Review emails with title company and real estate counsel as to survey/title report inquiry matters (.1)	0.10	35.00
July 10, 2024	DLR	Review and revise draft order approving Commodore sale free and clear (.5); review and analyze notes re Grouper lease documents and exchange messages with B. Lee re same (.5)	1.00	350.00
July 10, 2024	DAS	More follow up correspondence with counsel/parties and review of	0.80	280.00

Date	Initials	Description	Hours	Amount
July 11, 2024	DLR	Confer with B. Lee and further confer with buyer counsel re Commodore and Grouper interests (.5); confer with J. Alderman re Miami Beach (.2); further confer with J. Alderman, R. Gutlohn, B. Lee, L. Fisher re Miami Beach and further confer and review documents re Miami Beach property (.4)	1.20	420.00
July 11, 2024	DAS	Review additional emails with real estate counsel and other parties about Commodore Properties PSA edits, due diligence items and other issues; review our real estate counsel's detailed issues list to discuss Commodore PSA edits with buyer's counsel (.4)	0.40	140.00
July 12, 2024	DAS	Review and consider Mr. Rosendorf's additional comments and edits to Commodore property PSA redline (.2); confer with Mr. Rosendorf as to additional open items addressing some of those comments (.2); participate in group teleconference call with buyer/buyer's counsel and receivership real estate team to continue discussing Commodore PSA issues, items and provisions (1.4)	1.80	630.00
July 12, 2024	DLR	Exchange messages and confer with City of Coral Gables Attorney's office re meeting and follow up re same (.3); review and comment on latest iteration of Commodore Purchase Agreement (1.5); confer with D. Samole re same (.2); confer with B. Lee, D. Samole, S. Ferrara, buyer counsel re Commodore agreement (1.5); further review and analysis of Commodore ground	5.20	1,820.00

Date	Attorney	Description	Hours	Amount
July 15, 2024	DAS	Review and consider further updated and edited PSA documents and exhibits with notes and comments from Receiver's special real estate counsel (.5)	0.50	175.00
July 15, 2024	RN	Providing buyer's contractors access to Stewart Ave property and inspection of water damage.	1.40	420.00
July 15, 2024	DLR	Exchange messages with B. Lee and review of Receivership Order re authority to proceed with AT&T resolution (.4); draft memo to B. Lee re same (.3); review correspondence with City of Coral Gables re Valencia, certificate of use (.3); confer with City of Coral Gables (.1); further review and analysis of documents re Ponce transactions (1.3); draft notes re same (.5); exchange messages with B. Lee re analysis of Valencia loans and further follow up and analysis re same (1.2)	4.10	1,435.00
July 16, 2024	DAS	Review/consider draft proposed sale order circulated to Commodore Properties purchaser/counsel (.2)	0.20	70.00
July 16, 2024	DLR	Exchange messages with B. Lee re further follow up on free and clear sale orders and further research re same (.5); review and revise Commodore sale motion (.6); confer with City of Coral Gables re ATT project (1.0); confer with B. Lee re matters relating to Commodore, Miami Beach and Valencia properties and proposed sales (.6); further revise draft Commodore sale motion and exchange messages with B. Lee re same (.7); further confer and exchange messages with B. Lee and J. Alderman re Miami Beach settlement and sale, and continue	6.70	2,345.00

		to evaluate strategy and options for proposed sale (1.8); receive and review documents re Valencia loans (.4); receive and review documents and notes re ATT project (.2); receive and review draft sale documents re Valencia (.3); receive and review B. Lee message and attached Commodore sale documents (.3); preliminary review of HFT estoppel letter (.3)		
July 17, 2024	DLR	Extensive conferral with B. Lee re Valencia unit sale, Miami Beach proposed sale, Commodore proposed sale (1.3); further research re sale free and clear of option (.5); confer with J. Alderman re Miami Beach and advise B. Lee re same (.3); confer with buyer and counsel re Commodore (.3); review and revise Commodore PSA and exchange messages re same (1.1); further confer with B. Lee and L. Fisher re Miami Beach counter-offer (.2); review draft Miami Beach settlement terms and exchange messages with B. Lee re same (.3); update research memo re free and clear sales (.5); further exchange messages and follow up re Valencia / RLC closing statement (.3); preliminary review of Commodore buyer comments to sale order (.3); exchange messages re same (.3); revisions to Commodore PSA and exchange messages re same (.4); receive and review update on Los Pinos marketing (.2)	6.00	2,100.00
July 17, 2024	DAS	Review comments from buyer's counsel on proposed sale order provisions; review other counsel's further comments and edits on Commodore PSA (.4)	0.40	140.00
July 18, 2024	DLR	Review notices and docket re appeal of Stewart sale order and exchange messages with B. Lee re same (.2); confer with J. Alderman re Valencia (.3); confer with B. Lee	7.40	2,590.00

		re Valencia, Ponce, Stewart (1.4); further review of documents and emails re Ponce transactions (1.3); further confer with B. Lee, L. Fisher, lender and counsel re Miami Beach sale issues and options (1.0); exchange messages re title company issues for receivership sales (.3); review materials in preparation for Miami Beach code hearing (.4); attend Miami Beach code enforcement hearing (1.5); advise B. Lee re resolution of violation (.2); receive and review messages and documents re Commodore sale proposal (.5); review analysis of Valencia funding and exchange message re same (.3)		
July 18, 2024	DAS	Follow up correspondence with Stewart Property buyer counsel as to expiration of appellate period on Sale Order and some other information/document they will provide prior to closing (.1); review Commodore Property sale motion draft; review/consider further edits and redline comments on Commodore Property PSA and related exhibits/closing items (.5)	0.60	210.00
July 18, 2024	YCC	Review and analyze docket sheet, foreclosure complaint by 515 Valencia Acquisition and issued summonses; prepare service list for sale motion and verify addresses with Sunbiz for business entities (1.5).	1.50	225.00
July 19, 2024	DLR	Further review materials re free and clear sale orders and follow up with B. Lee re same (.6); confer with B. Lee and Commodore ground lease counsel re status of potential sale (.4); exchange messages with B. Lee re Villa Valencia loans (.2); further investigation and review of documents re same (1.1); draft memo to B. Lee re same (.3); exchange messages with A. Frey re Commodore ground lease property	3.40	1,190.00

		and code violation hearing (.3); further exchange messages with S. Ferrera re same (.2); receive and review information re City of Miami Beach claims and liens (.3)		
July 20, 2024	DLR	Receive and review message from S. Silver re Commodore potential purchase and preliminary analysis of response to same (.5)	0.50	175.00
July 22, 2024	AIG	Follow up with Ms. Lee and Mr. Rosendorf on violation notices for properties (0.3); Follow up with Mr. Rosendorf regarding motion for lien holders (0.2)	0.50	125.00
July 22, 2024	YCC	Coordinate obtaining certified copy of Stewart Grove sale order (.4).	0.40	60.00
July 22, 2024	RN	Attending appraisal visit of Unit 1202 at Villa Valencia apartments. Coordinating storage of hard copy documents retrieved from 275 and 299 Alhambra offices.	1.30	390.00
July 22, 2024	DLR	Review and analysis of Los Pinos debt accrual and settlement provisions to analyze results of potential sales (1.5); prepare spreadsheet analyzing sale outcomes under settlement (.5); review Los Pinos bankruptcy schedules re other secured claims and update spreadsheet re same (.5); exchange messages with GlobalPro and follow up re access agreement for inspections of Commodore property, revise and recirculate access agreement (.4); confer with B. Lee re status of disposition of Miami Beach, Commodore, Stewart, Los Pinos properties (.5); exchange messages with B. Lee re J. Kapoor website listing Los Pinos property and further follow up re same (.3); exchange messages and confer with B. Lee, L. Fisher, lender and counsel re Miami Beach sale negotiations (.5); exchange messages with B. Lee re Miami Beach sale motion (.3); exchange messages with B. Lee and A.	5.60	1,960.00

Date	Agent	Description	Hours	Amount
July 23, 2024	DAS	Garcia re status of code enforcement hearings (.3); receive and review messages re Valencia sale contract and inspections (.3); receive and review buyer revisions to Commodore PSA and lease assignment and further exchange messages re same (.5)	0.50	175.00
July 23, 2024	RN	Review more correspondence and edits on Commodore properties PSA (.3); review follow up correspondence with buyer/real estate counsel on Stewart pre-closing items and other documents, and closing date issues (.2)	1.10	330.00
July 23, 2024	DLR	Providing buyer's contractors access to Stewart Ave. property. Checking on water damage in property.	2.00	700.00
July 24, 2024	RN	Confer with B. Lee re Miami Beach sale motion (.4); confer with B. Lee re Los Pinos sale analysis (.5); exchange messages and confer with B. Lee re Miami Beach sale documentation and motion (.4); further exchange messages with A. Frey re code enforcement hearing and follow up re same (.3); receive and review B. Lee message re HFT Valencia estoppel letter (.2); receive and review messages re title commitment for Miami Beach (.2)	2.00	600.00
July 24, 2024	DLR	Attending inspection of 3162 Commodore Plaza property by Association's adjusters. Inspection of Commodore plaza property for break-in damage. Confer with contractor re: fixing same.	2.30	805.00
July 24, 2024	DLR	Confer and exchange messages with B. Lee re Commodore transaction and lease assignment (.2); further review buyer revisions to PSA and lease assignment (.3); review and consider proposed revisions re same (.3); review B. Lee and S. Ferrera comments and edits re same (.3); confer with B. Lee, S. Ferrera and D. Samole re		

Date	Attorney	Description	Hours	Amount
		Commodore sale documents (.4); receive and review further comments on Commodore sale order from title insurer (.3); receive and review further comments re lease assignment (.2); exchange messages with B. Lee and confer with J. Lapin re lien claims against LV / Urbin properties (.3)		
July 24, 2024	YCC	Review and revise service list for Villa Valencia sale motion (.4).	0.40	60.00
July 24, 2024	DAS	Review additional emails from Commodore Property purchaser/counsel enclosing most recent redline changes to PSA; review same (.1); call with real estate counsel and receiver discussing Commodore property PSA edits as well as Miami Beach property matters (.4); review buyer's edits to Commodore property lease assignment language; provide comments as to same (.2); review proposed closing statement for Stewart property transaction (.1)	0.80	280.00
July 24, 2024	YCC	Review and analyze list of interested parties for Miami Beach property and obtain/review various docket sheets and complaints; prepare service list of investors, plaintiff parties, and deposit holders for Miami Beach sale motion and verify/obtain addresses with Sunbiz for business entities (2.5).	2.50	375.00
July 25, 2024	DAS	Review proposed follow-up edits on Commodore Property PSA and call notes with Commodore buyer as to PSA and lease assignment issues (.2); review pair of comprehensive lien reports on Stewart property (.2); review multiple follow-up correspondence exchange between real estate counsel and closing agent and their enclosures (updated versions of various closing documents for Stewart Property transaction) (.3)	0.70	245.00
July 25, 2024	YCC	Review and analyze docket sheet, foreclosure complaint by 1234	2.00	300.00

Date	Attorney	Description	Hours	Amount
July 25, 2024	YCC	Washington Acquisition and issued summonses; prepare service list for Miami Beach sale motion and verify/obtain addresses with Sunbiz for business entities (1.5); review and assemble exhibits to Miami Beach sale motion (.5).	0.10	15.00
July 25, 2024	YCC	Review and analyze communications re: closing statement for Stewart Grove sale (.1).		
July 25, 2024	DLR	Exchange messages with J. Lapin re lien claims (.3); Confer with B. Lee re City of Miami code hearing (.2); confer with B. Lee re Miami Beach sale motion (.1); review messages re Miami Beach draft documents (.3); Further update research re receivership sales (.8); Review information and documents re Miami Beach sale and revise Miami Beach sale motion (2.8); confer with S. Silver re Commodore ground lease and review B. Lee notes re same (.8); receive and review B. Lee comments re Commodore PSA open issues and further follow up re same (.3); receive and review further revisions from S. Ferrera (.3); receive and review draft Fisher declaration re Miami Beach sale (.3); receive and review further comments re same (.3); exchange messages with J. Alderman re Miami Beach lender settlement (.3)	6.80	2,380.00
July 26, 2024	DAS	Review more correspondence exchange with buyer's real estate counsel and further updated closing statement on Stewart Property (.1)	0.10	35.00
July 26, 2024	RN	Attending appraisal of Villa Valencia Unit 1201.	1.20	360.00
July 26, 2024	DLR	Continue to revise Miami Beach sale motion (.6); receive and review message from J. Alderman with Miami Beach buyer proposed PSA and review same (.5); further exchange messages with B. Lee, S. Ferrera, J. Alderman re same (.4);	3.20	1,120.00

		further revise Miami Beach sale motion and exchange messages with B. Lee re same (1.4); review draft sale order (.3)		
July 29, 2024	DLR	Exchange messages and confer with J. Alderman re Stewart closing status (.2); receive and review attorneys fees for Stewart and exchange messages with B. Lee re same (.3); Receive and review revisions to Commodore PSA and exchange messages with B. Lee re same (.4); review revised Assignment of Lease and exchange messages with B. Lee re proposed revision (.3); receive and review further revisions and markups to Commodore PSA (.3); receive and review revisions to Miami Beach PSA and exchange messages with B. Lee re same (.4); receive and review report re Los Pinos from R. Kapoor and follow up with J. Alderman re interest accrual (.2); confer with B. Lee and S. Ferrera re Miami Beach contract (.5); receive and review message from R. Kapoor re Los Pinos and follow up with J. Alderman re per diem rates for Los Pinos (.3); receive and review spreadsheet re lender amounts owed on Los Pinos and compare to internal analysis (.3)	3.20	1,120.00
July 30, 2024	DLR	Review and update spreadsheet re Los Pinos sales analysis (.3); exchange messages and confer with B. Lee re Stewart sale closing and lender attorney fees (.3); confer with B. Lee, S. Ferrera, lender and counsel, proposed buyer re Miami Beach proposed sale (.6); exchange messages with B. Lee re F. Schwartz inquiry re Miami Beach property (.2)	1.40	490.00
July 31, 2024	DLR	Exchange messages and follow up re Miami Beach sale motion and order (.3)	0.30	105.00

July 31, 2024	YCC	Review and analyze lien amounts for Miami Beach properties and prepare spreadsheet of same (.7); review and revise Miami Beach sale motion (.2); review and analyze L. Fisher's declaration (.1); review and revise service list to same (.2); review and analyze recorded instruments and forward to B. Lee (.1).	1.30	195.00
August 1, 2024	DAS	Review correspondence from Commodore property purchaser counsel regarding Assignment of Leases document related to PSA and discussing logistics as to title agent items (.1); review redline version of proposed sale order on Commodore Property transaction; provide additional comments and edits to receivership counsel team (.5)	0.60	210.00
August 1, 2024	RN	Attending inspection of 515 Valencia Unit 1104. Email communication with Miami Water Department re: retrieval of meter from 3620 Stewart Ave. Email communication with buyer's attorney re: same. Confer with A. Chinchilla re: document review for [REDACTED]. Confer with F. St. Remy re: document review for [REDACTED] and search of Teamworks for 515 Valencia documents. Inspecting 3620 Stewart Ave. property for water meter location.	5.10	1,530.00
August 1, 2024	DLR	Receive and review appraisal for Valencia Unit 1201(.3); review notices and follow up re addressing Commodore code violations and prepare forms re same (.4); review Commodore appraisals (.3); review and revise Commodore sale motion (.5); review and revise Commodore sale order (.4); exchange messages with B. Lee, D. Samole and Commodore buyer counsel re draft sale order (.2); confer with J. Alderman re Stewart attorney fees, and follow up with B. Lee re same	3.40	1,190.00

		(.3); further exchange messages with J. Alderman and B. Lee re same (.2); receive and review T. Tolentino message and documents re Los Pinos interest calculations (.5); receive and review message from Miami Beach buyer re transaction documents (.3)		
August 2, 2024	DAS	Review/consider pair of correspondence and enclosures from Commodore property purchaser counsel and title agent representative about treatment of liens in sale motion and associated issues (.1)	0.10	35.00
August 2, 2024	RN	Attending second inspection of Villa Valencia unit 1104. Searching Google Workspace for covenants and easements for Villa Valencia property. Visit to 3620 Stewart Ave property to inspect floating water meter for removal and recording of serial number.	5.80	1,740.00
August 2, 2024	DLR	Exchange messages with B. Lee re Valencia sale motion (.2); receive and review B. Lee messages re analysis of documents re Valencia (.3); receive and review B. Lee messages re yacht sale (.2); further follow up re Commodore code issues (.2); further exchange messages with Commodore buyer counsel re sale order (.2); receive and review revised attorney fee statement for Stewart (.2); confer with J. Alderman and B. Lee re same (.2); further review of documents and communications re Valencia unit and exchange messages with B. Lee re same (.3)	1.80	630.00
August 4, 2024	DLR	Receive and review S. Ferrera comments re Miami Beach buyer transaction documents (.2)	0.20	70.00
August 5, 2024	DAS	Review counsel's further comments on proposed assignment of leases language in Commodore PSA-related documents; review further edits on proposed	0.20	70.00

Commodore Property sale order (.2)				
August 5, 2024	YCC	Review and revise service list for Villa Valencia sale motion (.2); review and assemble exhibits to Villa Valencia sale motion (.3); further review of dockets, pleadings, and recorded instruments; revisions to service list / mailing for 515 Villa Valencia sale motion (1.6).	2.00	300.00
August 5, 2024	DLR	Receive and review J. Alderman message re Stewart fees (.1); Confer with B. Lee re Stewart fee reserve (.3); confer with B. Lee and J. Alderman re same (.2); review Stewart billing records and proposed reductions, draft memo to B. Lee re same (.8); exchange messages with B. Lee and follow up with J. Alderman re same (.3); confer with B. Lee re Valencia sale (.3); review draft Valencia sale motion and draft revisions to same (1.0); review draft Valencia sale order and draft revisions re same (.4); review S. Ferrera comments to Valencia sale motion and order (.2); confer with J. Alderman re status of Miami Beach sale (.1); further review emails re Valencia / HFT funding and purchase contracts (.3); exchange messages with B. Lee and A. Ferrera re Commodore assignment of lease and PSA (.3); review messages re Commodore code compliance issues (.2); further review messages with Commodore buyer counsel (.2); receive and review messages from S. Ferrera re City of Miami and Commodore code compliance issues (.2); receive and review Commodore buyer counsel comments on draft sale order (.3)	5.20	1,820.00
August 5, 2024	RN	Attending inspection of Villa Valencia Unit 1104 with buyer. Call with plumber re: retrieval of floating water meter. Email communication with buyer's attorney re: removal of meter.	1.20	360.00

August 6, 2024	DLR	Confer with B. Lee re Commodore assignment provisions (.5); confer with B. Lee and review correspondence re Valencia sale (.5); revisions to Commodore assignment and exchange messages re same (.5); further review documents re Valencia sale (.3); further exchange messages with B. Lee and S. Ferrera re Commodore assignment (.3); further exchange messages with Commodore buyer counsel and further revisions to assignment (.3); exchange messages with B. Lee and review documents re ATT Valencia proposal and sequencing (.3); confer with B. Lee and Valencia buyer (.5); further confer with B. Lee re same (.2); confer with M. Boschetti and B. Lee re status of Los Pinos marketing and sale (.3); further confer with B. Lee re Valencia Unit 1104 offers (.3); review Los Pinos settlement and draft message to Los Pinos counsel re same (.5)	4.50	1,575.00
August 6, 2024	DAS	Review and exchange correspondence with Commodore buyer's counsel and Receivership team and review circulated enclosures attempting to address disputed language dealing with each of leases assignment, sale motion and sale order (.3)	0.30	105.00
August 7, 2024	DLR	Further analysis of Los Pinos settlement and potential outcomes and draft detailed message re same (.7); confer with B. Lee re same (.3); confer with B. Lee re Valencia sale, Miami Beach status (.3); draft message to F. Schwartz re Miami Beach and further exchange messages re same (.2); draft message to F. Schwartz re Los Pinos and further exchange messages re same (.2); participate in call with B. Lee and C. Gobel re Valencia appraisals (.4); participate in call with Miami Beach lender and	3.30	1,155.00

		counsel re sale status (.4); confer with B. Lee and broker re Montana property (.4); confer with B. Lee re Valencia appraisals and feedback from realtor and further review messages and information re same (.4)		
August 8, 2024	YCC	Review and revise service list for Villa Valencia sale motion (Unit 1104) (.2),	0.20	30.00
August 8, 2024	DAS	Review follow up emails with Commodore Property purchaser counsel about proposed sale order, provisions and title company follow up (.1)	0.10	35.00
August 8, 2024	DLR	Prepare for and participate in call with B. Lee and Los Pinos / Kapoor counsel re Los Pinos sale and extension (.5); further confer with B. Lee re same (.2); receive and review messages from B. Lee re Valencia unit sale (.2); exchange messages with F. Schwartz and L. Fisher re Miami Beach (.3)	1.20	420.00
August 9, 2024	RN	Visit to Villa Valencia property re: water leak inspection in Unit 1104. Email communication with Receiver re: update on document review project.	0.90	270.00
August 9, 2024	DLR	Review and revise Valencia Unit 1104 motion and order (.8); draft message to B. Lee re same and further exchange messages re same (.3); participate in call with B. Lee and Commodore buyer and counsel re ground lease issue (.5); draft notes for follow up issues re same (.3); further confer with B. Lee re same, and further exchange messages re same (.3); further evaluate Commodore transaction issues (.3); receive and review B. Lee message to R. O'Brien re Valencia sale motion (.1); confer with appraiser and B. Lee re Valencia 1301 (.3); confer with B. Lee re circulating Valencia motion and review messages re same (.2); receive and review messages re	3.70	1,295.00

		Inquiry on Alhambra and message from P. Humbert re foreclosure sale (.2); receive and review of Valencia / HFT payoff and preliminary analysis re same (.4)		
August 12, 2024	BMS	Call with Bernice Lee and David Rosendorf re: jurisdictional questions raised by HFT appeal.	0.40	100.00
August 12, 2024	DLR	Conference call with B. Lee re negotiations over Commodore ground lease (.4); confer with B. Lee and Y. Castro re compliance with code violation remedy (.3); confer with B. Lee and B. Sadowsky re Halpern appeal of Stewart sale order and follow up re same (1.0); review docket and court filings in receivership case re free and clear sales (.5); receive and review messages re FPL project at Valencia (.2); exchange messages with B. Lee and J. Alderman re Valencia sale motion (.3); receive and review messages re sequencing of Commodore PSA and buyer negotiations with ground leases and further consideration re same (.3); receive and review J. Alderman message to S. Rothstein re Miami Beach claims against property (.1); review status of Miami Beach code hearings and draft request for continuance (.3); receive and review notice of appeal by HFT and exchange messages re same (.3); analysis of appealability of sale order (.6); draft memo to B. Sadowsky re HFT appeal (.3); further exchange messages re same (.3); research and analyze cases re HFT appeal of sale order (2.5)	7.40	2,590.00
August 13, 2024	DLR	Confer with B. Lee and ground lease counsel re status of Commodore sale (.4); confer with B. Lee and lender and counsel re Miami Beach, Valencia Unit 1104 sale, and Los Pinos properties (.5); confer with B. Lee and S. Ferrera re	3.50	1,225.00

Date	Party	Description	Hours	Amount
		Miami Beach purchase agreement (.4); receive and review B. Lee message and attached documents re Valencia loans (.4); further analysis of information re Valencia proposed sale and lien claims (.5); further review and revise Miami Beach PSA (.5); further review and analyze cases re HFT appeal of sale order (.5); further exchange messages with B. Sadowsky re HFT appeal (.3)		
August 13, 2024	BMS	Draft memo re: jurisdictional issues raised on appeal.	7.00	1,750.00
August 14, 2024	DLR	Review Valencia loan and mortgage documents and communications re same (1.0); confer with B. Lee re same and further analysis re same (.8); further review and analyze HFT payoff information and additional information re same (.5); exchange messages with B. Lee re same (.3); confer with B. Lee, HFT and counsel re Valencia, Commodore, Stewart properties and status, and follow up with B. Lee re same (1.2); further confer and strategize with B. Lee re same (.5); draft notes re HFT call and follow up issues (.3); receive and review information and messages with appraiser re Valencia appraisal (.2); receive and review messages re updates to Commodore data room (.2); exchange messages with buyer re update on negotiations re ground lease (.2); review case re standing for HFT appeal and exchange messages with B. Sadowsky re same (.4); receive and review Stewart lien claim (.3);	5.90	2,065.00
August 14, 2024	BMS	Read Eleventh Circuit decision in Finn v. Cobb County School District re: appellate standing for non-parties.	0.30	75.00
August 14, 2024	BMS	Draft memo re: jurisdictional issues raised on appeal.	2.70	675.00
August 15, 2024	DLR	Receive and review M. Raymond message re Valencia sale motion	3.90	1,365.00

and follow up re same (.2); Review and revise Valencia Sale Motion and Order (.6); review payoff information from Valencia lender (.2); review addendum for Valencia purchase contract and B. Lee message re same (.2); confer with B. Lee and buyer and counsel re Commodore properties (.4); confer with B. Lee and C. Gobel re Valencia appraisals (.3); review B. Lee notes re call with appraiser (.1); review revisions to Commodore sale documents (.4); exchange messages with B. Lee and buyer counsel re same (.5); exchange messages with B. Lee re Valencia sale motion and order (.3); further review agreed order re Los Pinos and draft detailed message to counsel re Los Pinos sale and agreed order (.4); exchange messages with claimants' counsel re Stewart lien claims (.3)

August 15, 2024	BMS	Draft memo re: jurisdictional issues raised on appeal.	4.10	1,025.00
August 16, 2024	BMS	Draft memo re: jurisdictional issues raised on appeal.	4.10	1,025.00
August 16, 2024	DLR	Receive and review several messages re City of Miami Beach claims against Miami Beach property (.3); review Miami Beach permit expiration notice and draft message to M. Romagosa re same (.3); receive and review messages between B. Lee, buyer, and lender re Miami Beach transaction (.3); exchange messages with Stewart lien claimants' counsel (.3)	1.20	420.00
August 17, 2024	BMS	Draft memo re: jurisdictional issues raised on appeal.	3.70	925.00
August 18, 2024	BMS	Draft memo re: jurisdictional issues raised on appeal.	2.10	525.00
August 19, 2024	YCC	Confer with B. Lee (2x) re: Villa Valencia data room for Unit 1301 (.2); setup and provide link to data room (.1); exchange	0.40	60.00

		communications with broker re: same (.1).		
August 19, 2024	BMS	Draft memo re: jurisdictional issues raised on appeal.	9.20	2,300.00
August 19, 2024	DLR	Receive and review messages with J. Alderman and B. Lee re Valencia sale motion (.2); Confer with B. Lee and J. Alderman re Valencia sale motion and proposed order (.3); exchange messages with HFT counsel re same (.2); exchange messages with B. Lee re Miami Beach code hearings (.2); receive and review message to SEC counsel re Valencia sale motion and further messages re same (.2); confer with B. Lee, buyer and lender re Miami Beach transaction (.5); follow up re response to Commodore code violation notices re vacant building (.3); receive and review B. Lee and S. Ferrera messages re status of Commodore title and PSA updates (.3)	2.20	770.00
August 20, 2024	DLR	Review B. Sadowsky memo re jurisdictional issues for appeal (.4); Receive and review messages with F. Schwartz re Valencia sale motion and confer with B. Lee re same (.2); Prepare for and attend hearing re Miami Beach code violations (1.0); further review messages re Miami Beach statements and charges (.2); exchange messages with B. Lee re Miami Beach sale motion and proposed order and review same (.5); receive and review messages with T. Lehman re Martini escrow agent claim (.2); receive and review messages with R. Dooley re Commodore re-certification and hearing re same (.3); receive and review messages with Commodore condo association re status of sale efforts (.3); further review Miami Beach sale motion and order (.4)	3.50	1,225.00

August 20, 2024	YCC	Review and revise Villa Valencia sale motion and proposed order for Unit 1104 and assemble exhibits (1.5).	1.50	225.00
August 20, 2024	RN	Visit to Villa Valencia property to show photographer Unit 1301 and amenities. Searching Google Workspace for information on commercial tenants of Urbin MB Washington Ave. property re: dates of lease termination. Searching Sunbiz filings for information on commercial tenants for same.	7.10	2,130.00
August 21, 2024	YCC	Confer with B. Lee re: Villa Valencia sale motion (.1); review and prepare proposed order as exhibit (.2); finalize and file expedited motion to approve sale of Valencia Unit 1104 property; submit proposed order (.6); review service list and coordinate service of motion with sale contract and proposed order (.5).	1.40	210.00
August 21, 2024	DLR	Confer with B. Lee re analysis of HFT appeal and exchange messages with B. Sadowsky re same (.2); Further review and revise draft motion to approve Miami Beach sale and proposed order re same (.6); confer with parties re Martini claim against G&F and surety (.5); confer with B. Lee and R. O'Brien re HFT appeal of Stewart Grove sale order (.4); participate in call with B. Lee and counterparties re Miami Beach sale (.5); confer with B. Lee re Commodore sale motion and other asset disposition issues (.4); receive and review S. Ferrera message to Valencia association counsel re FPL bills and review attachments re same (.2); review Miami Beach info re city claims (.3)	3.10	1,085.00
August 22, 2024	BMS	Research re: certain motion practice for appeals; email David Rosendorf and Bernice Lee re: same.	1.40	350.00

August 22, 2024	DLR	Receive and review message from B. Sadowsky re HFT appeal and potential dismissal, further consider and analyze same (.3); exchange messages with B. Lee re Miami Beach sale motion and order and revisions to same (.3); exchange messages with B. Lee, buyer and lender re Miami Beach sale (.2); receive and review buyer revisions and comments to Miami Beach PSA (.3); further exchange messages re Miami Beach transaction (.3)	1.40	490.00
August 23, 2024	DLR	Receive and review message and information from L. Fisher re potential Miami Beach buyer and review further messages re same (.3)	0.30	105.00
August 26, 2024	YCC	Review, analyze and serve the court's paperless order setting hearing on Villa Valencia sale motion on service list (.4).	0.40	60.00
August 26, 2024	YCC	Telephone call with S. White re: status of lienholder funds (.1).	0.10	15.00
August 26, 2024	DLR	Confer with B. Lee, Martini and counsel re Valencia bond claim and related issues and review documents re same (.6); exchange messages with B. Lee re Valencia sale motion and hearing (.2); confer with B. Lee and R. O'Brien re HFT appeal and other case issues (.5); confer with B. Lee and lender, broker re Miami Beach sale efforts (.6); receive and review notice of hearing on Valencia sale motion and begin preparations for hearing (.7); receive and review messages from L. Fisher and lender counsel re Miami Beach potential purchaser (.3); receive and review notice re CIP in Halpern appeal and review prior order and rules re deadline (.3); further follow up re CIP (.3)	3.50	1,225.00
August 27, 2024	YCC	Review communications re: site inspection by Miami-Dade County of condos at Commodore properties	0.20	30.00

Date	Code	Description	Rate	Amount
August 27, 2024	YCC	Prepare certificate of service of Court's paperless order setting hearing on Villa Valencia sale motion and communications re: same (.4).	0.40	60.00
August 27, 2024	DLR	Participate in call with Los Pinos broker re status of sale efforts and follow up with B. Lee re same (.5); exchange messages re insurance notice for Los Pinos and payment of same (.2); receive and review several messages re Miami Beach contract, sale motion and proposed order and related documents (.6); confer with B. Lee re Valencia sale motion and hearing (.2); review several messages re Commodore proposed sale (.5); review further updates to Commodore sale documents (.4); confer with B. Lee and J. Wang re Valencia Unit 1301 listing (.5); exchange messages with counsel for potential buyer and B. Lee re potential offer on Valencia unit and template PSA re same (.3); review draft appraisal for Valencia Unit 1301 (.4); further preparations for hearing on Valencia sale motion (.6); receive and review message from Valencia lien claimant re effect of sale (.1); receive and review HFT civil appeal statement and exchange messages re same (.3)	4.60	1,610.00
August 27, 2024	DAS	Review correspondence and enclosure regarding Commodore property matters with the City, hearing notice, etc.	0.10	35.00
August 28, 2024	YCC	Site visit at Commodore properties to meet with B. Lee and Miami-Dade County officials for walk thru inspection and address signs and access at school property (1.5); confer with B. Lee re: sale of same (.2)	1.70	255.00
August 28, 2024	YCC	Review Court's paperless order cancelling hearing on Villa Valencia sale motion and confer with B. Lee	0.30	45.00

		re: same (.1); coordinate service of		
August 28, 2024	YCC	same on interested parties by mail and electronic mail (.2). Review communications re: Commodore properties inspection by condo association and claims adjuster; confer with R. Neary re: same (.1).	0.10	15.00
August 28, 2024	BMS	Review appellate docket; edit notice of appearance; edit CIPS; determine deadlines.	4.80	1,200.00
August 28, 2024	DLR	Prepare for hearing on Valencia sale (1.0); Receive and review notice re hearing cancellation and review and exchange messages re same (.3); review proposed order re findings regarding notice and consistency with purchase agreement and title insurer requirements, and draft message to B. Lee re same (.4); confer with B. Lee re Valencia sale motion, Los Pinos sale status and various other properties (.5); receive and review message to potential Valencia buyer re purchase agreement (.1); exchange messages with Woodforest counsel re guaranty claim (.1); receive and review messages from Commodore buyer re update on negotiations re ground lease (.2); receive and review message from S. Ferrera re updated title commitment (.2); draft further message to counsel re Los Pinos sale status (.2)	3.00	1,050.00
August 29, 2024	DLR	Exchange messages and review of documents re Stewart sale order appeal (.5); review revisions to certificate of interested persons and exchange messages re same (.5); exchange messages re Commodore sale and related documents (.3); receive and review messages to Commodore buyer re same (.2); receive and review Order approving Valencia sale, compare to submitted proposed order, and	2.00	700.00

Date	Party	Description	Hours	Amount
		draft message to B. Lee re same (.5)		
August 29, 2024	DAS	Review updated draft sale motion and sale order on Commodore Property transaction (.2)	0.20	70.00
August 29, 2024	YCC	Confer with B. Lee re: sale order on Valenca Unit 1104 and service list for Commodore properties sale motion (.1); coordinate service of sale order on interested parties by mail and electronic mail (.2).	0.30	45.00
August 29, 2024	BMS	Draft list of deadlines for appeals; call clerk's office to correct CIPs deficiency notice.	2.20	550.00
August 30, 2024	DLR	Receive and review proposed term sheet from potential purchaser of Valencia unit and consider same (.4); further review message from Valencia lien claimant and draft response (.3); receive and review messages with Valencia purchaser re motion and order (.2); receive and review messages re updated Commodore PSA (.2); receive and review messages re Miami Beach PSA (.3); receive and review messages re supporting documents for Miami Beach sale motion (.3); exchange messages with J. Tome to update on Miami Beach status (.2)	1.90	665.00
September 2, 2024	BMS	Cross-reference CIPs against list of affiliated entities; finalize CIPs filing.	1.70	425.00
September 2, 2024	RN	Email communication with B. Lee and Inspection company re: inspection of Commodore Plaza property.	0.20	60.00
September 2, 2024	DLR	Receive and review B. Lee message and access agreement re same (.2); review messages re Commodore access (.1); review B. Sadowsky message and attached updated CIP for Stewart appeal (.1)	0.40	140.00
September 3, 2024	BMS	Research re: requesting transcript as appellee in the Eleventh Circuit; drafting notice of designation of additional transcripts.	3.40	850.00

September 3, 2024	YCC	Confer with B. Lee re: Commodore properties sale motion and service list (.1); review and work on service list for Commodore properties sale motion (2.2).	2.30	345.00
September 3, 2024	BMS	Finalize CIPs and work with Raquel Penalver on filing.	0.40	100.00
September 3, 2024	BMS	Review certain cases collected by David Rosendorf relevant to appeal.	0.90	225.00
September 3, 2024	DLR	Receive and review messages re Washington Ave. access agreement (.1); revisions to access agreement and draft message to B. Lee re same (.3); further exchange messages re Miami Beach PSA (.2); receive and review completed appraisal for Valenica Unit 1301 (.3); receive and review further messages re Miami Beach PSA motion and supporting documents (.3); Prepare for and participate in call with J. Tome and B. Lee re anticipated Miami Beach sale (.5); Prepare for and participate in call with carrier counsel and B. Lee re Commodore insurance claim (.5); participate in call with M. Boschetti and B. Lee re status of Los Pinos sale (.3); follow up with counsel re Los Pinos status (.2); review agreed order and advise B. Lee re provisions regarding extension of stay period (.3); review filings and documents re litigation in connection with Commodore project (.8); prepare for and participate in call with investor counsel and B. Lee re Commodore claims and follow up re same (.9); exchange messages with B. Lee re Stewart appeal and review of record and transcripts to order, further follow up and exchange messages with B. Sadowsky re same (.5); further exchange messages with B. Sadowsky re research on mootness of appeal (.3); exchange messages with B. Sadowsky re submission of CIP (.2); receive and review update	6.00	2,100.00

		from A. Korge re Commodore (.1); receive and review messages re Miami Beach PSA (.2)		
September 3, 2024	RN	Attending Global Pro inspection at Commodore Plaza - email communication with B. Lee re: same.	2.40	720.00
September 4, 2024	BMS	Drafting notice of designation of additional transcripts.	2.30	575.00
September 4, 2024	BMS	Discuss motion to dismiss appeal with David Rosendorf and Bernice Lee.	0.30	75.00
September 4, 2024	DLR	Review and analyze purchase proposal for Valencia unit and confer with B. Lee re same (.5); prepare for and participate in call with Martini counsel re Valencia proposal (.4); Confer with B. Lee re Stewart lien claims (.2); review and analyze submitted lien claims for Stewart and prepare chart re same (.4); Review materials and documents in preparation for call with HFT counsel (.5); Prepare for and participate in call with B. Lee and HFT counsel re Stewart lien claims and other issues, and further confer with B. Lee re same (1.0); exchange several messages re Commodore purchase negotiations and lease issues (.3); review revised documents re same (.3); confer with B. Lee and B. Sadowsky re HFT appeal (.3); receive and review messages between B. Lee and J. Wang re Valencia listing agreement (.1); review B. Sadowsky follow up message re record on appeal (.1); receive and review appellant's amended CIP in HFT appeal (.1); further review messages re Commodore PSA (.2); receive and review messages re Valencia listing agreement (.1)	4.50	1,575.00
September 5, 2024	YCC	Confer with S. Villalobos re: exhibits to Miami Beach sale motion (.2).	0.20	30.00
September 5, 2024	DLR	Confer with B. Lee re status of Miami Beach, Commodore	4.60	1,610.00

properties and motions re same (.5); confer with B. Lee re HFT negotiations (.3); exchange messages with B. Lee re Los Pinos stay period (.2); receive and review messages re Commodore insurance coverage (.2); receive and review buyer message re Commodore PSA (.1); further confer with B. Lee re Commodore PSA and edits (.3); confer with B. Lee and SEC counsel re Miami Beach sale motion and related issues (.4); confer with B. Lee and Valencia lien claimant re sale status and related issues (.5); confer with B. Lee and Winmar counsel re Stewart lien claim and further confer with B. Lee re same (.4); exchange several messages and briefly counsel with buyer re Commodore PSA (.4); revisions to Miami Beach sale motion and confer with B. Lee re same (.4); receive and review R. Kapoor motion to extend Los Pinos stay period and confer with B. Lee and with J. Alderman re same (.5); further review agreed order and motion to extend (.2); further confer with J. Alderman re same (.1); receive and review J. Alderman message to F. Schwartz re foreclosure sale scheduling (.1)

September 6, 2024	BMS	Finalizing and filing notice of transcript designation for appeal.	0.40	100.00
September 6, 2024	DLR	Exchange messages re Commodore PSA execution (.2); receive and review A. Newman comments on motion and order and confer with B. Lee re same (.3); further confer with B. Lee and buyer counsel re Commodore motion, order and PSA (.4); receive and review follow up message from A. Newman re same (.1); receive and review further messages re Commodore PSA (.2) ; review transcript designation (.1); exchange messages with B. Sadowsky and B. Pohl re Stewart	2.40	840.00

		appeal (.2); receive and review messages re Miami Beach status (.1); receive and review G. Ceballos message re AT&T project (.1); review Valencia executed listing agreement (.1); exchange further messages with B. Sadowsky re Stewart appeal (.3); receive and review further revisions to draft Commodore sale order and messages re same (.3)		
September 6, 2024	YCC	Confer with B. Lee (2x) re: service list for Commodore properties sale motion (.7); review and analyze litigation cases filed after receivership order (.7); review and revise service list (2.3).	3.70	555.00
September 6, 2024	DAS	Review further redline comments on Commodore Properties sale motion and order from byer's counsel and then title agent; review follow up comments from counsel as to same (.2)	0.20	70.00
September 9, 2024	DLR	Follow up with B. Lee re Miami Beach code hearings (.1); Confer with J. Alderman re Los Pinos motion for extension and Miami Beach status (.2); research re loan authority issues (.9); review timing re Los Pinos motion to extend response (.1); receive and review I. Marcushamer and J. Alderman messages re Los Pinos (.2); exchange messages re Commodore sale order revisions (.3); further exchange messages with LPLLC counsel re Los Pinos (.2); receive and review messages to Kapoor counsel re Miami Beach sale motion (.2); receive and review correspondence re Commodore insurance claim (.2); receive and review B. Lee message and notices re Miami Beach code hearings (.2); receive and review further messages re conferral on Miami Beach sale motion and B. Lee message re revision to certificate of conferral (.2); exchange messages	4.10	1,435.00

		with B. Lee and review further revisions to certificate of conferral (.2); receive and review J. Tome message re Miami Beach motion and further exchange messages with B. Lee re same (.2); further exchange messages with A. Newman re Commodore sale order (.1); draft response to J. Tome (.1); review B. Lee message to Miami Beach buyer counsel re status (.1); draft request for continuance of Miami Beach code hearings (.2); review messages re Commodore sale motion (.2); receive and review lengthy response message from J. Tome (.2)		
September 9, 2024	YCC	Prepare certificate of service of Villa Valencia sale order (.2).	0.20	30.00
September 9, 2024	YCC	Review and revise expedited motion to approve sale of Miami Beach properties and proposed order (1.2); review and update service list (.2).	1.40	210.00
September 9, 2024	YCC	Review and analyze purchase and sale agreement for Commodore properties and exchange communications with B. Lee (.1).	0.10	15.00
September 10, 2024	DLR	Confer with B. Lee re Miami Beach sale motion, Commodore status, inquiries re loan obligations, and draft notes re same (.4); draft detailed message to C. Schmitt re analysis of loan obligations and defenses (.4); exchange several messages with counsel for Miami Beach depositors claims (.3); confer with J. Alderman re Los Pinos state court proceedings (.2); receive and review message re same and advise B. Lee re same (.2); receive and review messages re Valencia listing agreement (.2); receive and review messages re conferral on status conference motion, Commodore motion (.2); research re free and clear sales and status of pending SEC receivership matter, advise B. Lee re same (.4);	4.60	1,610.00

		exchange messages with B. Lee re Martini proposed stipulation (.2); further exchange messages with J. Tome re Miami Beach (.4); receive and review J. Alderman message and follow up messages re Los Pinos state court proceedings (.2); review filed Miami Beach sale motion (.2); confer with Valencia unit tenant and advise B. Lee re same (.3); exchange messages with ground lease counsel (.1); exchange messages with B. Lee re review of certain emails (.2); receive and review messages with SEC counsel re Commodore draft sale motion (.2); receive and review messages re Miami Beach sale motion (.2); receive and review M. Raymond message re Commodore draft sale motion conferral (.1); further exchange messages with Miami Beach notice parties (.2)		
September 10, 2024	BMS	Review Halpern's transcript request form and email Bernice Lee re: transcript.	0.20	50.00
September 10, 2024	BMS	Call clerk's office re: case caption for appeal.	0.60	150.00
September 10, 2024	YCC	Review and prepare proposed order as exhibit (.2); review, finalize and file expedited motion to approve sale of Miami Beach property with exhibits (.8); work on updating service list for Miami Beach sale motion (.6) and coordinate service of motion with sale contract and proposed order (.3); confer with B. Lee re: proposed order (.1) and finalize and submit same (.4); review and analyze communications from unit deposit holders and undeliverable emails and verify sale motion being served by mail on same (.4).	2.80	420.00
September 10, 2024	YCC	Review and analyze Commodore purchase and sale agreement (.2).	0.20	30.00
September 11, 2024	DLR	Confer with R. O'Brien & B. Lee re Miami Beach sale motion (.7); further confer with B. Lee and	5.80	2,030.00

exchange messages re Miami Beach sale, deposit claims, Commodore sale (.6); further review documents re deposit claims and exchange messages re same (.3); receive and review B. Lee message to G&F re Miami Beach deposit (.1); further review Chicago Title correspondence re Miami Beach deposits and exchange messages with B. Lee re same (.3); receive and review memo analyzing Miami Beach customer deposits (.3); receive and review memo analyzing Commodore customer deposits (.3); exchange messages with J. Tome re Miami Beach sale motion (.2); receive and review G&F response re Miami Beach deposit funds (.1); review purchase agreement and draft message to B. Lee re entitlement to deposit upon termination of PSA (.3); confer with B. Lee and review prior communications re potential settlement parameters for Stewart (.4); review information re luxury home market and sales and draft message to B. Lee re same (.2); confer with ground lease counsel re non-payment of ground lease rents, and advise B. Lee re same (.4); receive and review messages re Miami Beach deposit funds (.2); communicate with interested parties re Miami Beach sale motion (.3); receive and review J. Alderman response to request for payoff in Los Pinos and further messages re same (.3); draft message to Kapoor counsel with draft Commodore sale motion (.1); exchange messages and confer with buyer re status of Commodore sale motion (.2); exchange messages with HFT counsel re Commodore sale motion (.1); confer with B. Lee re analysis of Commodore loans and claims and draft notes re same (.4)

September 11, 2024	YCC	Retrieve vmail from counsel's office re: service of Miami Beach sale motion and call with same (.1); review reply emails to unit purchasers and address same (.1).	0.20	30.00
September 12, 2024	YCC	Review and analyze CSC correspondence re: service of process for One Sothesby's International Realty and forward to B. Lee (.1).	0.10	15.00
September 12, 2024	DLR	Receive and review J. Tome message and Notice of Objection to Miami Beach sale motion (.3); further review and consider response to same (.4); exchange messages with J. Tome re objection (.2); prepare for and participate in call with J. Tome re Miami Beach (.5); receive and review J. Alderman message and request to confer re Los Pinos and proposed final judgment, and review further responses and messages re same (.3); receive and review message and report from surety counsel re Commodore deposits (.3); exchange messages with interested party re Miami Beach sale motion and other properties (.3);	2.70	945.00
September 13, 2024	RN	Attending Villa Valencia Unit 1104 visit by buyer. Searches in Google Workspace for Commodore Centre Association documents re: financial information and contracts.	3.10	930.00
September 13, 2024	DLR	Further research re free and clear sales and review recent order re same, draft message to B. Lee re same (.4); exchange messages with HFT counsel re conferral on Commodore motion (.1); confer with B. Lee re Commodore sale motion (.3); receive and review further messages from J. Alderman re Los Pinos state court motion (.2); receive and review notes from J. Alderman re Los Pinos motion to extend stay (.3); prepare for and participate in call with HFT counsel re Commodore sale motion (.5);	3.00	1,050.00

		draft detailed message to B. Lee re same (.2); receive and review HFT redlines to Commodore sale order (.3); further exchange messages with J. Alderman re Los Pinos motion to extend stay (.2); exchange messages with J. Tome re status conference (.3); exchange messages with T. Lehman re draft stipulation for Valencia deposit (.2)		
September 14, 2024	DLR	Exchange messages re potential buyer for Miami Beach property (.2)	0.20	70.00
September 15, 2024	DLR	Further exchange messages re potential buyer for Miami Beach property (.2)	0.20	70.00
September 16, 2024	YCC	Coordinate service of the court's paperless order of setting status conference on all pending motions on service list for Miami Beach sale motion (.3).	0.30	45.00
September 16, 2024	DLR	Confer with B. Lee re pending matters for Commodore, Miami Beach and follow up re same (.3); exchange messages with Commodore buyer re status of sale motion (.2); receive and review information from HFT re lease payments and backup (.3); receive and review C. Schmitt message analyzing loan enforceability issues (.4); receive and review further message from J. Alderman re Los Pinos motion and attempt to confer with Kapoor re same (.2); exchange messages and follow up with notice parties re Miami Beach sale motion (.3); further confer with unit depositors re Miami Beach sale motion (.3); exchange messages with Y. Castro re service of status conference notice (.2); exchange messages with T. Lehman re draft stipulation (.1); further review HFT lease payment information and follow up with B. Lee re same (.3); review HFT markups to Commodore sale order and draft further revisions re same, draft message to B. Lee re same (.7);	3.70	1,295.00

		<p>further exchange messages with J. Tome re Miami Beach sale motion and exchange messages with L. Fisher re same (.4)</p>		
September 17, 2024	YCC	Review and analyze several purchase sale agreements for Commodore properties and update service and mailing lists for Commodore properties sale motion (2.8).	2.80	420.00
September 17, 2024	YCC	Review and update service list for Miami Beach sale motion (.1); review and address unit purchasers' inquiries re: Miami Beach sale motion (.1).	0.20	30.00
September 17, 2024	BMS	Draft motion to dismiss HFT appeal.	5.70	1,425.00
September 17, 2024	YCC	Attention to returned mail to unit purchaser re: Valencia sale motion and update list (.1).	0.10	15.00
September 17, 2024	DLR	Exchange messages with B. Lee and L. Fisher re Miami Beach sale motion and objection (.2); extended conference with J. Alderman re Miami Beach sale motion and objection (.4); confer with B. Lee and L. Fisher re Miami Beach objection and further confer with B. Lee re same (1.0); review B. Lee comments and edits to Commodore motion and order and work on revisions to same (.6); exchange messages with B. Lee re same (.1); receive and review notices re Miami Beach code hearings (.1); follow up re Miami Beach unit purchaser inquiries (.3); draft message to HFT counsel re proposed revisions to Commodore sale order and further follow up re same (.3); receive and review messages re conferral on Los Pinos motion (.2); exchange messages with Commodore buyer re status of sale motion (.2); exchange messages and confer with J. Alderman re Los Pinos (.2); advise B. Lee re same (.1); draft response to J. Tome re Miami Beach objection (.3)	4.00	1,400.00

September 18, 2024	BMS	Draft motion to dismiss HFT appeal.	0.40	100.00
September 18, 2024	DLR	Exchange messages with interested party re Miami Beach sale (.3); exchange messages with T. Lehman re draft stipulation (.2); receive and review Miami Beach code notice and exchange messages re same (.2); receive and review order canceling Los Pinos state court hearing (.1); further review messages re conferral on Los Pinos (.2); receive and review transcript of Los Pinos bankruptcy hearing announcing settlement (.3); receive and review messages from City re Valencia / AT&T project (.2); review draft stipulation, escrow agreement, PSA and surety agreement (.3); review and mark up draft stipulation re Valencia surety and exchange messages with T. Lehman re same (.3); advise B. Lee re same (.1); work on response to Los Pinos motion to extend stay and research re same (2.2); receive and review Mironest offer letter re Valencia (.3); receive and review J. Tome message and attached objection re Miami Beach sale (.3); exchange messages with HFT counsel re Commodore sale motion (.3)	5.30	1,855.00
September 19, 2024	YCC	Coordinate service of the court's paperless order of resetting status conference on all pending motions on service list for Miami Beach sale motion (.3).	0.30	45.00
September 19, 2024	YCC	Confer with B. Lee re: Commodore property sale motion (.1).	0.10	15.00
September 19, 2024	YCC	Review and analyze objection to Miami Beach sale motion (.1); confer with B. Lee re: same (.1); review notice of joinder by other unit purchasers (.1).	0.30	45.00
September 19, 2024	DLR	Further research re response to Los Pinos motion to extend stay period (1.0); further work on response to Los Pinos motion (2.0); confer with B. Lee re Miami Beach,	8.10	2,835.00

Commodore, FL department of revenue, status conference (.4); exchange messages with J. Alderman re Los Pinos motion (.2); exchange messages with R. O'Brien re Los Pinos conferral before filing motion (.1); further work on revisions to Commodore sale order and motion to address HFT issues (1.0): receive and review B. Lee comments on response and further revise response to Los Pinos motion (.5); receive and review B. Lee update to Miami Beach buyer (.1); exchange messages with J. Alderman re Los Pinos motion (.2); exchange messages with Commodore buyer counsel re status (.2); exchange messages with Miami Beach buyer counsel re assertions of relationship with receivership entities (.2); continue to address HFT issues re Commodore sale motion and order (.3); revise and finalize response to Los Pinos motion (.3); exchange messages with M. Maranges re proposed joinder in Miami Beach objection (.3); further analyze offer re Valencia unit and exchange messages with B. Lee re same (.4); exchange messages with T. Lehman re revisions to stipulation and review further revisions (.3); advise R. O'Brien re revisions to Commodore motion and order and status of same (.2); exchange messages with S. Rothstein re Miami Beach code hearings (.1); review R. O'Brien comments and questions re Commodore sale motion (.1); exchange messages with N. Snyder re G&F document production and state court litigation issues (.2)

September 20, 2024

YCC

Review and analyze Non-Parties Amended Urgent Notice of Objection to Miami Beach sale motion (.1); coordinate service of the court's paperless order setting

0.60

90.00

Date	Party	Description	Hours	Amount
September 20, 2024	DLR	status conference on Non-Parties Amended Urgent Notice of Objection to Miami Beach sale motion, etc. upon service list for same (.3); review unit purchaser's address change request and update same; exchange communications re: same (.2). Confer with R. O'Brien and B. Lee re Commodore sale motion and other issues, and further confer with B. Lee re same (.7); receive and review J. Tome message re re-filing objection and review amended objection (.4); exchange messages re further conferral on Los Pinos (.2); receive and review court order re Miami Beach objection and follow up re same (.3); receive and review message re execution of Commodore PSA (.2);	1.80	630.00
September 20, 2024	YCC	Telephone call with unit purchaser re: Miami Beach sale motion and status conference (.3); exchange emails re: receivership website (.1).	0.40	60.00
September 21, 2024	DLR	Confer with B. Lee re Commodore sale motion and preparation for status conference (.4); exchange messages with A. Korge re status of Commodore sale motion (.3); receive and review lender response to Los Pinos motion to extend stay (.3); receive and review R. Kapoor response to objection to Miami Beach sale motion (.3)	1.30	455.00
September 22, 2024	DLR	Exchange messages with S. Silver re status of Commodore sale motion (.2); prepare for status conference and objections to Miami Beach sale motion, exchange messages with B. Lee re same (1.0); confer with B. Lee re Miami Beach objections, Commodore sale motion, status conference (.5); confer with J. Alderman re Miami Beach objections, Los Pinos motion (.3); continue to prepare for status conference (1.5); revise analysis of debt calculation and potential	4.30	1,505.00

Date	Party	Description	Hours	Amount
September 23, 2024	DLR	Receive and review extension re HFT appeal of Stewart sale order and exchange messages re same (.2); exchange messages with Commodore buyer re status (.2); exchange messages with ground lease counsel re status (.2); exchange messages with Miami Beach buyer re status conference (.2)	0.80	280.00
September 23, 2024	YCC	Exchange communications with B. Lee re: service of Valencia sale motion on interested party (.1).	0.10	15.00
September 24, 2024	YCC	Confer with B. Lee re: outcome of status conference on pending motions, including Miami Beach sale motion (.1).	0.10	15.00
September 24, 2024	YCC	Confer with B. Lee re: Commodore properties sale motion (.1); review and analyze Commodore properties sale motion and proposed order and assemble exhibits to same (.8); review, finalize and file motion to approve sale of Commodore properties with exhibits (.8) and coordinate service of sale motion on interested parties (.3); and submit proposed order (.4); review and analyze communications from interested parties and undeliverable emails and verify sale motion being served by mail on same (.4).	2.80	420.00
September 24, 2024	DLR	Confer with B. Lee re Commodore sale motion and order, Miami Beach motion (.5); further revisions to Commodore sale motion and order (2.5); confer with Commodore buyer and follow up re same (.5); confer with ground lease counsel and follow up re same (.4); confer with J. Tome re Miami Beach objection (.3); finalize and supervise filing of Commodore sale motion (.3); exchange messages re potential purchaser for Valencia unit and site visit (.3); exchange messages re service of	6.00	2,100.00

		Commodore motion (.2); send several messages advising of filing of Commodore motion (.2); exchange messages with B. Lee re Valencia purchase offer (.2); follow up re coordination of Valencia site visit for potential buyer (.2); exchange messages with B. Lee re Miami Beach code notices (.2); receive and review Commodore buyer communications with ground lessee (.2)		
September 25, 2024	DLR	Confer and follow up with L. Fisher and B. Lee re Miami Beach objection and review data room list and additional information re same (.8); Coordinate site visit for potential Valencia unit purchaser and confer with R. Gutlohn re same (1.2); exchange messages with City of Miami attorney re Commodore sale motion (.2); draft application to appeal re new Miami Beach code violation notice (.3); exchange messages to coordinate conference re Los Pinos (.2); update analysis of Los Pinos sale scenarios and debt accrual, review information on comparable sales and listings (1.1); confer with Commodore buyer counsel and follow up with B. Lee re PSA deposit provisions, and further follow up with buyer re same (.3); review communications from L. Fisher re offers received on Miami Beach (.3); further exchange messages with potential Valencia buyer (.2); update Miami Beach buyer re new code violation (.1); further exchange messages re Los Pinos and potential resolution (.2); further update Los Pinos sale analysis and exchange messages with B. Lee re same (.2)	5.10	1,785.00
September 26, 2024	DLR	Confer with Kapoor, counsel, lender, broker re Los Pinos sale process and follow up re same (.5); exchange messages re media inquiries on Commodore sale motion (.2); Participate in call with	3.20	1,120.00

		City of Miami attorney re Commodore sale motion and further confer with B. Lee re same (.5); receive additional information and documents from City of Miami attorney (.3); draft update to B. Lee re Los Pinos and confer with B. Lee re same (.4); exchange messages and confer with Commodore buyer re ground leases (.3); prepare confidentiality agreement for potential Valencia buyer (.3); exchange messages with potential buyer re confidentiality agreement and request for plans (.3); follow up re execution of confidentiality agreement and delivery of plans for review (.2); exchange messages with potential buyer of Valencia unit re purchase offer (.2)		
September 27, 2024	DLR	Receive and review messages re AT&T Valencia project status (.2); exchange messages to follow up on Los Pinos offer (.2); exchange messages with counsel for potential Valencia buyer (.2); further review letter with purchase offer (.3)	0.90	315.00
September 30, 2024	DLR	Exchange messages re Commodore motion and S. Silver messages, follow up re same (.3); exchange messages with counsel for potential Valencia unit purchaser (.2); exchange several messages re status of offer on Los Pinos (.3)	0.80	280.00
Total for ASSET DISPOSITION			----- 385.90	119,990.00

## CASE ADMINISTRATION

July 1, 2024	RN	Email communication to Essensys re: follow up on prior requests.	0.10	30.00
July 1, 2024	YCC	Review FPL bill for 515 Valencia and work on registering FPL online account (.6); confer with B. Lee re: same (.2); review and attempt to process payment online and by phone (.4).	1.20	180.00
July 1, 2024	YCC	Review email re: AT&T disconnection and routers (.1).	0.10	15.00
July 2, 2024	AIG	Review and summarize status of property violation appeals (0.4); Conference with Ms. Lee and Ms. Penalver regarding same (0.2); Conference with Mr. Rosendorf regarding lien claimant motion (0.1)	0.70	175.00
July 2, 2024	RN	Email communication with B. Lee re: update on [REDACTED] [REDACTED] search and search for Commodore plaza documents.	0.20	60.00
July 2, 2024	FSR	Email exchange with Ms. Lee re: [REDACTED] production (.10); analyze, process, and brand responsive documents for production (.20); prepare corresponding production log (.10)	0.40	60.00
July 2, 2024	FSR	Email correspondence with Ms. Lee regarding Commodore Project data-room repository (.10); update same accordingly (.20)	0.30	45.00
July 2, 2024	FSR	Correspondence with Ms. Lee re: [REDACTED] ESI collection (.20); attention to, and coordinate conflict check for Relativity workspace (.20)	0.40	60.00
July 2, 2024	DLR	Confer with B. Lee re 1505 Ponce and further investigation re same (.5)	0.50	175.00
July 3, 2024	DLR	Receive and review message from N. Snyder and third party complaint in Martini / G&F action (.3)	0.30	105.00
July 3, 2024	YCC	Attention to processing payment of FPL invoice for 515 Valencia property (.3).	0.30	45.00

July 5, 2024	DLR	Exchange messages with E. Rosen re [REDACTED] list of attorneys providing advice in individual capacity (.2)	0.20	70.00
July 8, 2024	DLR	Review draft motion and order re production under [REDACTED]	0.30	105.00
July 8, 2024	RN	Google Vault Searches for response to [REDACTED] - searches of emails and Shared Drives for certain documents and communications. Email communication to B. Lee summarizing results.	5.60	1,680.00
July 8, 2024	FSR	Email correspondence with Ms. Lee regarding Commodore Project data-room repository (.10); update same accordingly (.10)	0.20	30.00
July 9, 2024	DLR	Exchange messages with B. Lee payroll tax issue and exchange messages and confer with J. Chirinos re same (.3); draft message to B. Lee re same (.1)	0.40	140.00
July 9, 2024	YCC	Review and address lienholder inquiries re: proof of claim for Miami Beach property (.1).	0.10	15.00
July 10, 2024	DLR	Review correspondence with R. Kapoor counsel re lawyers representing him individually and follow up re same (.3); review google workspace re same (.4); review correspondence with [REDACTED] counsel re lawyers representing him individually and follow up re same (.3); review Google workspace re same (.4); confer with SEC counsel and B. Lee re document production issues (.3); confer with B. Lee and F. Saint-Remy re document review and production issues (.5); further review of Google workspace (.5); further exchange messages and confer with B. Lee re [REDACTED] document requests and protocol re same (.5)	3.20	1,120.00
July 10, 2024	YCC	Review returned mail for unknown tenants at 299 Alhambra property and update list (.1).	0.10	15.00

July 10, 2024	FSR	Correspondence with Ms. Lee regarding processing certain custodian account (.40); attention to, and prepare ESI collections for processing, organization, and review (.90); email exchange with Ms. Lee re: ██████ production (.30); analyze, process, and brand responsive documents for production (.20); prepare corresponding production log (.10)	1.90	285.00
July 11, 2024	DLR	Receive and review DJ Motha motion to quash subpoena (.2)	0.20	70.00
July 11, 2024	FSR	Correspondence with Ms. Lee regarding ██████ (.40); attention to, and run queries on Google applications and export results for relevant custodians (4.3)	4.70	705.00
July 15, 2024	YCC	Exchange communications re: AT&T modems and invoices and confer with R. Neary re: same (.1).	0.10	15.00
July 15, 2024	DLR	Review correspondence with Regis re obtaining payroll records and draft detailed message to A. Castro re same (.4)	0.40	140.00
July 17, 2024	RN	Reviewing production of ██████ documents - email communication with B. Lee re: same. Email communication re: appraiser's visit to Villa Valencia property.	0.50	150.00
July 18, 2024	YCC	Review and analyze Goodkind documents are duplicate files (.1).	0.10	15.00
July 18, 2024	RN	Reviewing M. Dade County Appraiser office's Change of Address forms for properties owned by Receivership entities. Confer with M. Rodriguez re: same. Call to County Appraiser's office re: same.	1.10	330.00
July 19, 2024	RN	Reviewing Miami Dade County appraiser change of address forms - email communication to M. Rodriguez re: corrections.	0.40	120.00
July 22, 2024	DLR	Receive and review R. O'Brien email and E. Rosen response re ██████ attorney-client relationships, and further exchange messages with B. Lee re same (.3); review	1.20	420.00

Date	Category	Description	Hours	Amount
July 23, 2024	FSR	Receivership Order re inclusion of Patriots United and Receiver control over privilege of Receivership Companies (.3); draft response to E. Rosen (.2); receive and review motion to file amended complaint in G&F action and B. Lee message re same, further exchange messages re same (.4)	4.10	615.00
July 23, 2024	FSR	Attention to, and run queries on Google applications and export results for relevant custodians (2.3); revise privilege search terms for ██████████ ██████████ pst (1.3); set up privilege coding panel accordingly (.50)	4.10	615.00
July 23, 2024	DLR	Receive and review further response from E. Rosen re Patriots United (.1); exchange messages with B. Lee and F. Saint-Remy re ██████████ ██████████ document production (.3); Exchange messages and follow up re inspector access to Commodore property (.3); confer with B. Lee re claims against escrow agent (.1); exchange messages and follow up re attorney-client claims by ██████████ ██████████ and ██████████ (.2);	1.00	350.00
July 24, 2024	DLR	Exchange messages with B. Lee and F. Saint-Remy re ██████████ ██████████ production (.2); review hit report re document production (.2)	0.40	140.00
July 24, 2024	FSR	Correspondence with Ms. Lee re: search terms (.20); revise same accordingly (.50); prepare and circulate search terms report (.90); review, sample and run production checks and queries to prepare ██████████ ██████████ production (1.9); correspondence with Ms. Lee re: ██████████ ██████████ production (.10); receive, analyze, and prepare said production for processing, organization and review (.20); receive and review correspondence with ██████████ re: PST files for 5 custodians (.30)	4.10	615.00
July 25, 2024	DLR	Confer with B. Lee re escrow deposits and documents re same (.3)	0.30	105.00

July 25, 2024	YCC	Review and revise Receiver's second quarterly report (.5).	0.50	75.00
July 26, 2024	FSR	Correspondence with Ms. Lee re: status of ██████ production (.20); attention to, and follow up re: same (.20); prepare draft cover letter (.20)	0.60	90.00
July 29, 2024	DLR	Review and revise receiver's report and exchange messages with B. Lee re same (.9); receive and review letter to SEC re ██████ document production and further exchange messages re same (.3)	1.20	420.00
July 29, 2024	YCC	Review and update spreadsheet to include creditors to receive claims notice (.2).	0.20	30.00
July 29, 2024	FSR	Correspondence with Ms. Lee and ██████ regarding review protocol and ██████ (.40); revise correspondence re: productions (.10); attention to, and follow up re: ██████ production (.30)	0.80	120.00
July 30, 2024	AIG	Conference with Ms. Lee regarding document review project (0.1); Review initial assignment description (0.1)	0.20	50.00
July 30, 2024	YCC	Finalize and file Receiver's second interim report (.4).	0.40	60.00
July 30, 2024	FSR	Attention to, QC, and finalize ██████ production deliverable and serve same on SEC (3.8); multiple correspondence with Ms. Lee regarding email account for five custodians in response to ██████ privilege review, and related issues (.80); attention to, and prepare PSTs to serve ██████; draft accompanying correspondence (2.7)	7.30	1,095.00
July 30, 2024	DLR	Finalize letter to SEC re ██████ production (.2); Review counsel responses re ██████ atty-client parties and analyze search results from Google workspace re same (1.6); confer and exchange messages with B. Lee, F. Saint-Remy re same (.5);	2.90	1,015.00

		review and exchange messages with B. Lee re attorney list (.3); exchange messages with B. Lee re second interim receiver's report (.3)		
July 31, 2024	AIG	Prepare for call with Ms. Lee regarding document review (0.1); Conference with Ms. Lee regarding document review assignment (0.4); Take notes regarding same (0.2); Review emails from Mr. Neary and Ms. Lee regarding project details (0.1)	0.80	200.00
July 31, 2024	FSR	Correspondence with Ms. Lee regarding revised privilege terms relating to [REDACTED] representation (.20); prepare search terms and circulate terms report (.90); attention to, and set up privilege review workflow and review batches, and related issues (2.3); interoffice discussion with Mr. Neary regarding same (.20)	3.60	540.00
July 31, 2024	YCC	Review and update cast of characters spreadsheet to add creditor to receive claim notice.	0.10	15.00
July 31, 2024	RN	Call with B. Lee re: document review project. Confer with F. St. Remy re: project parameters. Reviewing attorney master list. Email communication with B. Lee, D. Rosendorf, and A. Chinchilla re: summary of project.	1.10	330.00
July 31, 2024	DLR	Exchange messages with B. Lee re document review and initial privilege review (.3)	0.30	105.00
August 1, 2024	AIG	Conduct document review (5.1); Conference with Ms. Saint-Remy regarding same (0.2); Conference with Mr. Neary regarding same (0.3); Conference with Ms. Lee regarding same (0.2)	5.80	1,450.00
August 1, 2024	DLR	Exchange messages with B. Lee re R. O'Brien inquiry on G&F action, further review status and filings re same, and participate in call with B. Lee and R. O'Brien re same (.5); review R. O'Brien follow up message to T. Lehman re same (.1)	0.60	210.00

August 1, 2024	YCC	Meet with records custodian at City of Miami Police Dept. for police report on lost floating water meter for Stewart Grove 2 and follow up with Miami Dade County Water & Sewer if anything else is required (1.8); prepare written statement re: lost floating water meter for Stewart Grove 2 and forward to B. Lee (.4); review communications with Miami Dade County Water & Sewer re: returning floating water meter for Stewart Grove 1 and payment of final bill (.1); confer with R. Neary re: floating water meter (.1); circulate written statement and police report to Miami Dade County Water & Sewer (.1).	2.40	360.00
August 1, 2024	FSR	Correspondence with Mr. Neary and team re: coding protocol (.60); attention to, and update review workflow accordingly (.80); coordinate user credentials (.20)	1.60	240.00
August 1, 2024	FSR	Correspondence with Ms. Lee regarding service on a domestic corporation, Pepper's Miami Beach, LLC (.20); legal research and investigation for updated service address of said corporation and officers (.90)	1.10	165.00
August 2, 2024	FSR	Email exchange with Ms. Lee re: document review workflow (.20); attention to, and prepare batch sets for the various firms (.50); correspondence with Mr. Neary re: Restrictive Covenant and Public Park Easement relating to the Villa Valencia project (.20); conduct searches in TeamWorks database and review regarding same (1.0)	1.90	285.00
August 5, 2024	AIG	Review emails regarding document review (0.3); Conference with Ms. Lee regarding same (0.1); conduct document review (0.6)	1.00	250.00
August 5, 2024	YCC	Review and analyze beneficial ownership information reporting requirements for business entities in receivership (.4).	0.40	60.00

August 5, 2024	FSR	Email exchange with Ms. Lee re: document review workflow (.20); attention to, and prepare batch sets for the [REDACTED] [REDACTED] (.20)	0.40	60.00
August 6, 2024	DLR	Review SEC response to D. Motha motion to quash subpoena (.2); review prior [REDACTED] responses re individual attorney-client privilege parties (.3)	0.50	175.00
August 6, 2024	YCC	Review and analyze FPL bill for Villa Valencia Unit 1104 and process for payment (.2).	0.20	30.00
August 6, 2024	RN	Searching and reviewing documents and email communication in Google Workspace for Easement and Covenant documents for 515 Valencia Ave. property. Email communication with attorneys at [REDACTED] and [REDACTED] re: status of filing/recording easement. Email communication to Receiver, B. Lee re: summary of review of documents and emails.	3.50	1,050.00
August 7, 2024	YCC	Review and update spreadsheet to add creditor to receive claim notice.	0.10	15.00
August 7, 2024	AIG	Conduct document review (0.7); Conference with team regarding same (0.3)	1.00	250.00
August 7, 2024	YCC	Review and analyze communications re: return of floating water meter and receipt for same (.1).	0.10	15.00
August 7, 2024	RN	Returning floating water meter from 3620 Stewart Ave. property to Miami Dade County water department. Email communication with attorney for buyer re: same.	1.20	360.00
August 8, 2024	AIG	Conduct document review (0.6)	0.60	150.00
August 8, 2024	RN	Email communication with Receiver and F. St. Remy re: search for [REDACTED] documents. Email communication re: water leak in Villa Valencia Unit 1104. Email communication with [REDACTED] attorney re: recording of public	0.40	120.00

Date	Code	Description	Hours	Rate
August 8, 2024	FSR	Correspondence with Ms. Lee regarding [REDACTED] production (.20); analyze, process, and brand responsive documents for production (.50); prepare corresponding production log (.10); correspondence with Ms. Chinchilla re: [REDACTED] (.20); review and create review batch sets re: same - (.30)	1.30	195.00
August 9, 2024	AIG	Conduct document review (1.1); Conference with Ms. Lee regarding same (0.3)	1.40	350.00
August 9, 2024	YCC	Review and analyze corporation information for three receivership and related entities and note whether amended annual reports and/or reinstatement should be filed (.3).	0.30	45.00
August 9, 2024	FSR	Telephone call with Ms. Lee re: batches review status (.20); correspondence with Ms. Lee re: [REDACTED] review batches (.20) attention to, and prepare same (.20)	0.60	90.00
August 11, 2024	RN	Searching Google Workspace Shared Drives re: Patriots United. Email Communication with B. Lee re: same.	1.90	570.00
August 12, 2024	YCC	Confer with B. Lee re: signage to comply with notice for Commodore properties (.1); review emails re: same (.1).	0.20	30.00
August 12, 2024	BMS	Research re: deadline for certain motion practice to Eleventh Circuit.	0.30	75.00
August 12, 2024	DLR	Exchange messages with counsel for creditor re case status and claim distributions (.3)	0.30	105.00
August 13, 2024	YCC	Review and analyze invoices from creditors; update spreadsheet and serve receivership order with cover letter (.6); communication with B. Lee re: same (.1).	0.70	105.00
August 13, 2024	YCC	Site visit at Commodore Plaza to address signage and take photographs to comply with City's	1.10	165.00

		request; communications with B. Lee and D. Rosendorf re: same (1.1).		
August 13, 2024	RN	Google Workspace searches for Commodore files to provide to potential buyer - email communication with B. Lee re: results of same. Reviewing ██████████ ██████████ documents re: privilege review.	4.50	1,350.00
August 13, 2024	FSR	Receive and review correspondence from ██████████ re: ██████████ (.10); correspondence with ██████████ and Ms. Lee re: processing specs (.40)	0.50	75.00
August 13, 2024	FSR	Attention to, and compile materials related to the Commodore properties	0.30	45.00
August 14, 2024	AIG	Conduct document review and discuss same with Ms. Lee (0.5)	0.50	125.00
August 14, 2024	FSR	Correspondence with Ms. Lee re: Commodore Files (.20); review, compile, and organize materials re: Urbin Development - Urbin Grove closing (.80); update data room accordingly (.30)	1.30	195.00
August 15, 2024	DLR	Confer with B. Lee re motion to unseal and review materials re same (.3); exchange messages with J. Alderman re state court Miami Beach action and stay (.2)	0.50	175.00
August 15, 2024	AIG	Conduct document review (1.6)	1.60	400.00
August 15, 2024	YCC	Telephone call with S. Knight re: status of Stewart property.	0.10	15.00
August 15, 2024	RN	Attending call with ██████████ re: document review and production. Call with B. Lee and F. St. Remy re: procedures for same. Searching Google Workspace for information on Urbin Miami Beach.	3.40	1,020.00
August 15, 2024	FSR	Telephone conference with Ms. Lee and ██████████ re: ESI processing (1.0); review to confirm data size and provide processing estimates (.30); review correspondence from Ms. Lee re: conference summation (.20); correspondence with Mr.	1.80	270.00

Date	Code	Description	Hours	Amount
		Neary re: issue tags (.30)		
August 16, 2024	AIG	Conduct document review (0.6)	0.60	150.00
August 16, 2024	DLR	Exchange messages with Woodforest Bank counsel (.1); confer with Woodforest Bank counsel re potential guaranty claim and effect of receivership stay order (.3)	0.40	140.00
August 16, 2024	RN	Searching Google Workspace for documents on penthouse - email communication with B. Lee re: summary of same. Visit to Commodore Plaza for inspection.	4.20	1,260.00
August 16, 2024	FSR	Correspondence with Ms. Lee re: Urbin Development closing docs (.20); receive and organization same for review (.30)	0.50	75.00
August 19, 2024	RN	Communication with Josie Wang re: Villa Valencia penthouse visit. Email communication with building management re: same. Confer with F. St. Remy re: Teamworks search for tenants of Urbin Miami Beach property.	0.30	90.00
August 19, 2024	FSR	Correspondence with Mr. Neary re: prior tenants (.10); conduct searches in TeamWorks to locate documents and evidence to determine specific dates tenants vacated subject properties (3.1); receive and review correspondence with [REDACTED] and Ms. Lee coordinating meet-and-confer re: ESI collection (.30)	3.50	525.00
August 19, 2024	DLR	receive and review T. Lehman message and attachments re Martini claim against escrow agent and issues with bond, and further consideration re same (.5)	0.50	175.00
August 20, 2024	FSR	Attention to, and prepare batch sets for [REDACTED] and [REDACTED] [REDACTED] (.20); continue reviewing in TeamWorks to locate documents and evidence to determine specific dates tenants vacated subject properties (2.3); attention to, and prepare [REDACTED]	4.00	600.00

Date	Attorney	Description	Hours	Amount
		ESI custodian to serve on [REDACTED] (1.5)		
August 21, 2024	AIG	Conduct document review (.2)	0.20	50.00
August 21, 2024	DLR	Confer with [REDACTED] B. Lee and team re document production issues (.3); exchange messages with R. Neary re document review and identification of counsel (.2)	0.50	175.00
August 21, 2024	YCC	Review and file amended annual report for Urbin Miami Beach Owners, LLC (.3).	0.30	45.00
August 21, 2024	RN	Attending call with [REDACTED] re: subpoena production. Reviewing [REDACTED] documents re: privilege review.	3.40	1,020.00
August 21, 2024	FSR	Meet-and-confer with Ms. Lee and [REDACTED] of [REDACTED] re: status of ESI processing (.40); correspondence with Ms. Lee regarding drive access (.20)	0.60	90.00
August 22, 2024	DLR	Exchange messages with Woodforest counsel and exchange messages with B. Lee re same (.2); review receivership order, documents and org charts re same (.3)	0.50	175.00
August 23, 2024	YCC	Review and process FPL bill for payment (Villa Valencia property) (.1).	0.10	15.00
August 23, 2024	YCC	Attention to ordering no trespassing signs for Commodore property - school (.2); confer with B. Lee re: same and other issues (.2).	0.40	60.00
August 23, 2024	YCC	Confer with B. Lee re: reinstating Urbin Miami Beach Mezzanine LLC for sale of property (.1).	0.10	15.00
August 23, 2024	DLR	Receive and review T. Lehman message and attached draft limited objection re escrow agent case and surety issues (.3); receive and review draft Consent Final Judgment re same (.2)	0.50	175.00
August 26, 2024	DLR	Exchange messages and review draft letter from [REDACTED] re document production and review issues and confer with B. Lee re	0.90	315.00

		same (.5); receive and review message from B. Lee and attached documents re insurance claim on Commodore and carrier provision of counsel, and follow up re same (.4)		
August 26, 2024	FSR	Review and troubleshoot documents tagged Technical Issue (.70); corresponding with Ms. Lee re: Draft Language for Filter/Privilege Review (.20); review to provide feedback re: same (.20); review correspondence with team re: feedback (.20)	1.30	195.00
August 27, 2024	FSR	Telephone call with Ms. Lee re: review batches (.20); correspondence with Ms. Lee re: technical issues	0.20	30.00
August 27, 2024	DLR	Further exchange messages with B. Lee re [REDACTED] letter re document production and review issues (.2); receive and review message from T. Lehman re hearing on motion for consent judgment and consider effect of same (.3)	0.50	175.00
August 27, 2024	DLR	Exchange messages with B. Lee re investor counsel inquiry on Commodore and follow up and review documents re same (.4); exchange messages with former employee re COBRA payments and review information re same (.3); draft message to investor counsel re Commodore (.3)	1.00	350.00
August 27, 2024	YCC	Review and analyze communications from former employee re: terminated health insurance and add to spreadsheet (.1).	0.10	15.00
August 27, 2024	YCC	Review and prepare reinstatement of Urbin Miami Beach Mezzanine LLC; communications with B. Lee re: same (.4).	0.40	60.00
August 27, 2024	AIG	Conduct document review (1.3)	1.30	325.00
August 28, 2024	AIG	Conduct document review (0.4); Conference with Ms. Lee regarding bank request letters (0.1)	0.50	125.00

August 28, 2024	DLR	Further follow up with B. Lee re document production issues and addressing same (.5); revise letter re same (.2)	0.70	245.00
August 28, 2024	DLR	Further review receivership order and corporate docs and confer with Woodforest counsel re guaranty claim (.3); advise B. Lee re same (.1)	0.40	140.00
August 28, 2024	RN	Confer with F. St. Remy re: production of potentially privileged documents--Email communication with B. Lee re: same. Review clawback letter for same. Email communication re: inspection of Commodore.	0.40	120.00
August 29, 2024	AIG	Conference with Ms. Lee regarding bank subpoenas and letters (0.4)	0.40	100.00
August 29, 2024	FSR	Continue cross-referencing search terms against various privilege lists	1.30	195.00
August 29, 2024	DLR	Exchange messages and review documents and organizational charts re creditor action on personal guaranty (.3);	0.30	105.00
August 30, 2024	AIG	Draft bank letters and subpoenas (0.8)	0.80	200.00
August 30, 2024	DLR	Receive and review E. Rosen response to ██████ re identification of counsel (.2)	0.20	70.00
September 2, 2024	AIG	Draft letters and subpoenas to banks (1.4)	1.40	350.00
September 3, 2024	DLR	Exchange messages with B. Lee re motion for status conference and review same (.2); review E. Rosen message re ██████ privilege and follow up message re same (.2); revise motion for status conference and draft message to B. Lee re same (.3)	0.70	245.00
September 3, 2024	AIG	Draft letters and subpoenas to banks (1.3)	1.30	325.00
September 4, 2024	AIG	Draft letters and subpoenas to banks regarding certain documents (1.0); Conduct document review (0.2)	1.20	300.00

September 4, 2024	YCC	Confer with A. Chinchilla and E. Scott re: demand letters and subpoenas to financial institutions (.2).	0.20	30.00
September 5, 2024	FSR	Receive and review correspondence from SEC re: claw back (.10); correspondence with Ms. Lee re: Woodforest Bank production (.20)	0.30	45.00
September 5, 2024	DLR	Confer with B. Lee re document production issues and individuals' identification of counsel (.2); exchange messages re Woodforest document production (.2); receive and review B. Lee message to R. O'Brien re motion for status conference (.1); follow up re Woodforest production (.1);	0.60	210.00
September 5, 2024	AIG	Revise bank letters and subpoenas (1.0); Conduct document review (0.6)	1.60	400.00
September 5, 2024	YCC	Review and analyze notice of serving subpoenas and update service list (1.0).	1.00	150.00
September 6, 2024	AIG	Conference with counsel for City National Bank regarding letter sent (0.1); Conduct document review (1.0)	1.10	275.00
September 6, 2024	YCC	Review and finalize notice of serving subpoenas on JPMorgan Chase and Seacoast Bank (.5); review and analyze subpoenas to JPMorgan Chase and Seacoast Banking (.1); confer with B. Lee re: service of same (.1); review and circulate notice of serving subpoenas upon counsel of record (.2).	0.90	135.00
September 6, 2024	DLR	Confer with B. Lee re state court litigation against Urbin Commodore Residential (.2); review docket and court filings re same and draft message to B. Kalmanson re Receivership Order stay (.4); receive and review messages re document production in response to subpoenas (.2); receive and review B. Lee, R. O'Brien messages re	1.20	420.00

		motion for status conference (.1); receive and review T. Lehman message and proposed stipulation re Martini / G&F litigation (.3)		
September 9, 2024	FSR	Correspondence with Ms. Chinchilla re: City National Bank of Florida (.20); receive, analyze, and prepare same for processing, organization and review (.20)	0.40	60.00
September 9, 2024	AIG	Conference with Ms. Lee and K. Rin regarding City National Bank missing items.	0.20	50.00
September 10, 2024	RN	Reviewing ██████████ documents for privilege. Research on ██████████ LLCs mentioned in documents. Email communication to B. Lee re: results of review.	1.10	330.00
September 10, 2024	FSR	Correspondence with Ms. Lee re: additional review batches (.20) attention to, and prepare batches for ██████████ ██████████ and ██████████ ██████████ (.50); correspondence with team re: review status (.20); correspondence with Ms. Lee re: data room (.30); attention to, compile, and update shared Commodore Project folder with pertinent documents requested by Mr. Korge (.70)	1.90	285.00
September 10, 2024	YCC	Review, finalize and file unopposed motion for status conference on 1st fee application and submit proposed order (.5).	0.50	75.00
September 10, 2024	AIG	Conference with K. Rin regarding production from City National Bank (0.1); Conduct document review and conference with Ms. Lee regarding same (0.4)	0.50	125.00
September 10, 2024	DLR	Receive and review messages and F. Schwartz responses re draft motion for status conference (.1)	0.10	35.00
September 11, 2024	AIG	Conference with City National Bank regarding missing documents (0.3); Conference with JPMorgan Chase regarding production and review documents sent (0.2)	0.50	125.00

September 11, 2024	RN	Reviewing Google Workspace documents re: financial documents for Commodore plaza.	3.30	990.00
September 11, 2024	FSR	Attention to, and review correspondence with team re: City National Bank Requests	0.30	45.00
September 11, 2024	DLR	Prepare notice of filing receivership order in state court litigation matter and follow up with counsel re same (.3); receive and review notice of cancellation of state court hearing (.1); further exchange messages with counsel re same (.1); exchange messages re substitution of counsel in Mironest action (.1)	0.60	210.00
September 12, 2024	AIG	Review JPMorgan Chase production and conference with team regarding same (0.2)	0.20	50.00
September 12, 2024	RN	Reviewing Google Workspace re: Commodore Centre Association documents.	2.30	690.00
September 12, 2024	CJS	Research case law regarding issues with lenders, loans and related issues.	3.70	925.00
September 12, 2024	FSR	Correspondence with Ms. Chinchilla re: JPMorgan Chase production (.10); receive, analyze, and prepare same for processing, organization and review (.20)	0.30	45.00
September 12, 2024	DLR	Exchange messages with A. Chinchilla re document production responses (.2)	0.20	70.00
September 13, 2024	DLR	Receive and review order setting status conference and exchange messages re same (.3); begin preparations for status conference on all pending matters (.5); exchange messages with L. Garcia re updating Location Ventures web page (.2)	1.00	350.00
September 13, 2024	CJS	Research case law regarding issues with lenders, loans and related issues.	2.70	675.00
September 13, 2024	FSR	Receive, analyze, and prepare Commodore Centre documents for processing, organization and review	0.20	30.00

September 14, 2024	CJS	Further research case law regarding issues with lenders, loans and related issues.	0.80	200.00
September 16, 2024	AIG	Review voicemail from JPMorgan Chase and respond (0.2)	0.20	50.00
September 16, 2024	DLR	Receive and review messages re document production in response to subpoenas (.2)	0.20	70.00
September 16, 2024	CJS	Draft memorandum detailing analysis of legal research regarding certain issues related to lenders and loans.	1.10	275.00
September 17, 2024	DLR	Review filings in preparation for status conference (.5)	0.50	175.00
September 18, 2024	AIG	Review documents received from JPMorgan (0.3); Conference with K. Rin regarding same (0.2); Conference with Ms. Lee and Mr. Rosendorf regarding status of other bank documents (0.1); Conduct document review (0.8)	1.40	350.00
September 18, 2024	DLR	Further review filings and begin to prepare outline for status conference (1.0); receive and review messages re subpoena document production (.1); exchange messages with B. Lee re FL Dept. of Revenue correspondence and follow up re same (.3); receive and review order resetting status conference (.1)	1.50	525.00
September 19, 2024	AIG	Review pending items for bank requests (0.3); Review JPMorgan Chase missing items and conference with JPMorgan Chase counsel regarding same (0.3); Conference with JPMorgan Chase counsel regarding same (0.5); Conference with Ms. Lee and Ms. Scott regarding service of subpoena (0.3); Conduct document review (0.2)	1.60	400.00
September 19, 2024	RN	Email communication with MSP4 Company re: retrieval of NAS server.	0.20	60.00
September 19, 2024	DLR	Exchange messages with A. Chinchilla and B. Lee re subpoena	0.20	70.00

Date	Attorney	Description	Hours	Amount
September 20, 2024	AIG	document production issues (.2) Review invoices for process server and conference with Ms. Scott regarding same (0.3); Conduct document review (1.3)	1.60	400.00
September 20, 2024	RN	Email communication with Virtuworks re: retrieval of NAS.	0.10	30.00
September 20, 2024	DLR	Confer with G&F counsel re document production, state court litigation issues (.3); confer with FL Dept. of Revenue re notices to Urbin Coral Gables (.3); receive and review further message from T. Lehman re revised stipulation (.3)	0.90	315.00
September 22, 2024	DLR	Prepare for status conference on various motions, exchange messages with B. Lee re updated status of receivership estate and receivership funds (.5)	0.50	175.00
September 23, 2024	AIG	Conference with Ms. Villalobos and Ms. Lee regarding Bank of America production (0.2); Conference with Ms. Saint-Remy and Ms. Lee regarding other bank documents (0.2)	0.40	100.00
September 23, 2024	YCC	Review and analyze delinquent tax bill for Montana property and search for address change confirmation (.1); two telephone calls with Flathead County Treasurer's office re: payoff amount for tax bill and address change for 7240 US Highway 2 SPE LLC (.2); review and access online payment website and follow up email with B. Lee re: same (.1).	0.40	60.00
September 23, 2024	YCC	Review and process FPL bill for Villa Valencia property (.1).	0.10	15.00
September 23, 2024	DLR	Work on outline and prepare for status conference (3.0); Attend status conference on all pending matters including (a) Kapoor motion to advance costs; (b) Motha motion to quash subpoena; (c) HFT motion to intervene; (d) Abell motion to intervene; (e) Kapoor motion to extend stay; (f) objections to Miami	6.80	2,380.00

		Beach sale; (g) Receiver's fee applications and further confer with counsel re same (3.5); receive and review J. Raskin message re Kapoor counsel and assertion of privilege (.1); receive and review message from N. Snyder re potentially privileged documents for review (.2);		
September 24, 2024	AIG	Review and organize bank records produced (0.7); Conference with Ms. Lee and Ms. Saint-Remy regarding same (0.2); Conference with Bank of America regarding accessing produced documents (0.6); Conference with Ms. Lee and Ms. Villalobos regarding same (0.2); Conduct document review and conference with Ms. Lee regarding same (0.2)	1.90	475.00
September 24, 2024	YCC	Coordinate payment of delinquent 2023 taxes remaining on Montana property (.1).	0.10	15.00
September 24, 2024	FSR	Correspondence with Ms. Chinchilla re: JPMorgan Chase response to subpoena	0.30	45.00
September 25, 2024	AIG	Review status of documents received from banks (0.1); Conduct document review (0.3)	0.40	100.00
September 26, 2024	AIG	Conduct document review (1.1); Review status of bank documents requests (0.2)	1.30	325.00
September 26, 2024	YCC	Confer with C. Herskowitz re: outstanding 2023 taxes for Montana property (.1); review and coordinate payment of outstanding 2023 taxes for Montana property (.3).	0.40	60.00
September 26, 2024	RN	Email communication with IT representative from Virtuworks re: retrieval of Location Ventures NAS server.	0.20	60.00
September 26, 2024	DLR	Receive and review DJ Motha motion for hearing re motion to quash (.1)	0.10	35.00
September 27, 2024	AIG	Conduct document review and provide status of same to Ms. Lee (1.7); Update status of bank	2.50	625.00

		documents received and draft communication to Ms. Lee regarding same (0.5); Conference with JPMorgan regarding missing documents (0.3)		
September 27, 2024	DLR	Receive and review message from G&F counsel re additional documents to review for potential privilege (.2); receive and review order on fee application and exchange messages re same (.1)	0.30	105.00
September 29, 2024	DLR	Exchange messages with T. Lehman and B. Lee re further revisions to stipulation (.2);	0.20	70.00
September 30, 2024	AIG	Conduct document review (0.8); Draft summary of documents reviewed and send to Ms. Lee (0.2)	1.00	250.00
September 30, 2024	DLR	Review documents flagged by G&F re potential privilege, confer with B. Lee re same, and draft message to G&F counsel re Receiver position on privilege (.6); draft notes on documents reviewed (.6); confer with B. Lee re status conference orders, further exchange messages re same, and confer with clerk re same (.3); follow up with B. Lee re same (.1); receive and review T. Lehman message re revised stipulation (.2); confer with T. Lehman and B. Lee re same (.6); receive and review draft motion to approve stipulation and order and further exchange messages re same (.4)	2.80	980.00
Total for CASE ADMINISTRATION			193.30	47,435.00

# **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: 32680  
Date: October 7, 2024  
Matter ID: 151.0001

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

For Professional Services Rendered July 1, 2024 through September 30, 2024

Professional	Initials	Position	Experience	Hours	Rate	Fees
Kerry-Ann M. Rin, CPA, CIRA	KMR	Partner	20 Years	4.6	\$350	\$ 1,610.00
Christopher M. Vatti	CMV	Manager	5 Years	0.3	\$300	\$ 90.00
Susan Y. Tai	SYT	Sr. Associate	7 Years	1.7	\$250	\$ 425.00
Kayla N. Richard	KNR	Associate	1 Year	15.8	\$250	\$ 3,950.00
Sangeeth T. John	STJ	Associate	1 Year	0.6	\$250	\$ 150.00
<b>Blended Average Hourly Rate:</b>					<b>\$271</b>	
<b>Total Fees:</b>				<b>23.0</b>		<b>\$ 6,225.00</b>
<b>Total Amount Due</b>						<b>\$ 6,225.00</b>



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: 32680  
Date: October 7, 2024  
Matter ID: 151.0001

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

For Professional Services Rendered July 1, 2024 through September 30, 2024

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
07/01/2024	KNR	Reviewed and analyzed escrow activity for G&F Escrow account ending x7016 and updated analysis.	2.2	\$250	\$ 550.00
07/02/2024	SYT	Downloaded June 2024 Intuit QBO invoices (16 entities).	0.4	\$250	\$ 100.00
07/03/2024	KNR	Prepared analysis of G&F Villa Valencia escrow activity.	1.3	\$250	\$ 325.00
07/08/2024	KNR	Continued to prepare analysis of G&F Villa Valencia escrow activity.	5.9	\$250	\$ 1,475.00
07/09/2024	KNR	Continued to prepare analysis of G&F Villa Valencia escrow activity.	1.4	\$250	\$ 350.00
07/18/2024	KNR	Reviewed additional G&F documents received and updated analysis.	0.4	\$250	\$ 100.00
07/22/2024	KMR	Call with B. Lee re: Villa Valencia lender funding.	0.3	\$350	\$ 105.00
07/22/2024	SYT	Downloaded QBO Audit Logs for the entities 800 Dixie Partners and Location Ventures for the periods of July 22, 2017 through July 22, 2024.	0.6	\$250	\$ 150.00
07/25/2024	SYT	Resend QBO invitations for thirteen entities to [REDACTED]	0.3	\$250	\$ 75.00
07/31/2024	KMR	Call with B. Lee re: Miami Beach customer deposits.	0.1	\$350	\$ 35.00
07/31/2024	SYT	Downloaded July 2024 Intuit QBO invoices (16 entities).	0.4	\$250	\$ 100.00



YIP ASSOCIATES

FORENSIC ACCOUNTING +  
FINANCIAL INVESTIGATIONS

Invoice Number: 32680

Matter ID: 151.0001

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

For Professional Services Rendered July 1, 2024 through September 30, 2024

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
08/13/2024	KNR	Updated analysis of Villa Valencia Purchase Settlement Agreements and reconciled G&F Villa Valencia escrow analysis to settlement statements.	3.2	\$250	\$ 800.00
08/20/2024	KNR	Continued to reconcile G&F Villa Valencia escrow analysis to settlement statements.	1.4	\$250	\$ 350.00
08/21/2024	KMR	Various communications with B. Lee re: QuickBooks (.2); reviewed analysis of Villa Valencia PSAs (.9); reviewed analysis of G&F Villa Valencia escrow activity (2.8).	3.9	\$350	\$ 1,365.00
09/05/2024	CMV	Downloaded August 2024 Intuit QBO invoices (16 entities).	0.3	\$300	\$ 90.00
09/10/2024	KMR	Reviewed additional documents from City National Bank and email communication with A. Chinchilla re: City National Bank subpoena response.	0.2	\$350	\$ 70.00
09/16/2024	KMR	Reviewed additional documents received from JPM Chase and communication with A. Chinchilla.	0.1	\$350	\$ 35.00
09/16/2024	STJ	Reviewed additional documents received from JPM Chase.	0.4	\$250	\$ 100.00
09/18/2024	STJ	Reviewed additional documents received from JPM Chase and updated bank analysis.	0.2	\$250	\$ 50.00
<b>Total Fees</b>			<b>23.0</b>		<b>\$ 6,225.00</b>
<b>Total Amount Due</b>					<b>\$ 6,225.00</b>

Please remit payment by mail 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](http://WWW.DAYPITNEY.COM)

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

September 30, 2024

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	34,540.00
Total Disbursements	31.00
<b>Current Balance Invoice # 34306721</b>	<b>\$ 34,571.00</b>

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](http://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](http://WWW.DAYPITNEY.COM)

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

September 30, 2024  
 Invoice: 34306721

Tax Identification No. 06-0317480

**FOR PROFESSIONAL SERVICES RENDERED** in the below captioned matter(s) for the period through September 30, 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>
07/01/2024	Call with Receiver Parties regarding Commodore PSA and document file	Ferrera, S	2.0	\$ 700.00
07/01/2024	Call with Buyer Parties regarding Commodore PSA and document file	Ferrera, S	1.0	350.00
07/01/2024	Review status e-mails and document file	Ferrera, S	0.2	70.00
07/02/2024	Update Commodore PSA per call with Buyer and Receiver Parties; prepare redline and forward to Receiver for comment; correspond with FATICO regarding order title and lien searches	Ferrera, S	2.1	735.00
07/02/2024	Review Commodore violations and correspond with City of Miami personnel regarding same	Ferrera, S	0.6	210.00
07/02/2024	Review updated Valencia PSA from Receiver and document file; review e-mails from Buyer regarding Private Parking garage issues	Ferrera, S	0.5	175.00
07/03/2024	Review of draft PSA for Valencia property; compile title exceptions for Valencia property; brief review of RE and	Alvarado, N	0.5	75.00

Day Pitney LLP

Invoice: 34306721

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
	Ground Lease PSA for commodore property; review e-mail exchanges regarding access for water leak damage on the Stewart property; review amendment revising trustee name for Stewart property provided by J. Rodriguez and S. Ferrera's comments to same; review e-mail from S. Ferrera to City of Miami Beach to hold on violations pending sale of Miami Beach property; review City of Miami Beach regarding scheduling a hearing with the Special Magistrate			
07/03/2024	Review Valencia proposal from AT&T correspond with receiver; AT&T and consultant regarding same; request and receive additional plans and permits regarding scope of work and correspond with Coral Gables regarding status and open matters; review status e-mails regarding 1104 offer	Ferrera, S	1.0	350.00
07/03/2024	Correspond with City of Miami Beach regarding various open liens and violations and request tolling of enforcement pending Receivership resolution	Ferrera, S	0.5	175.00
07/03/2024	Receipt and review comments to Commodore PSA from Receiver; update PSA to incorporate redline and forward to Buyer's counsel	Ferrera, S	0.8	280.00
07/04/2024	Work on PSA Exhibits and correspond with FATICO regarding title issues	Ferrera, S	2.3	805.00
07/05/2024	Prepare excel spreadsheet of all Commodore parcels to calculate each parcels estimated pro rata percentage value and review amended DOC regarding sale provisions; correspond with Receiver parties regarding same	Ferrera, S	1.5	525.00
07/08/2024	Correspond with Miami Beach regarding continuance request	Ferrera, S	0.3	105.00
07/08/2024	Review Valencia Parking Schematic provided by Unit 1104 buyer and mark up same; correspond with Receiver and Condo Association Counsel regarding same; receipt and review e-mail from V.	Ferrera, S	1.0	350.00

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Invoice: 34306721

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
	Bonet regarding AT&T plans and status regarding same			
07/08/2024	Finalize Commodore PSA Exhibits and provide to Receiver parties; update excel spreadsheet regarding per parcel valuation and forward to Receiver parties; receipt and cursory review of lease with Tenant and document file	Ferrera, S	1.0	350.00
07/09/2024	Review Valencia Parking Issues and correspond with Receiver regarding same	Ferrera, S	1.0	350.00
07/09/2024	Review and document Commodore e-mails and correspond with FATICO regarding same	Ferrera, S	0.5	175.00
07/10/2024	Receipt and review various parking assignment documents and confer with A. Acosta regarding action items; review detailed unit ledger regarding 1104 and send e-mail to Receiver parties regarding same	Ferrera, S	0.5	175.00
07/10/2024	Confer with B. Lee regarding title issues on Miami Beach regarding lis pendens and foreclosure suit	Ferrera, S	0.3	105.00
07/11/2024	Correspond with parties regarding scheduling call with City of Coral Gables to discuss various open items; review issues related to FPL Lighting and recorded title instrument and correspond with Receiver regarding same and review issues regarding parking and reassignments and document file	Ferrera, S	1.0	350.00
07/11/2024	Review PSA from Buyer's counsel and provide issues list to Receiver Parties	Ferrera, S	1.0	350.00
07/11/2024	Prepare draft closing statement for possible private sale and forward to Receiver Parties and call with B. Lee regarding status	Ferrera, S	0.6	210.00
07/12/2024	Review e-mail exchanges between S. Ferrera and Y. Gonzalez from FATICO regarding request for list of condos for Commodore property; lien search and draft of order for sale for Commodore property; review e-mail from Y. Gonzalez	Alvarado, N	0.2	30.00

Day Pitney LLP

Invoice: 34306721

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
	regarding turnaround time for the 4 parcels for Commodore title; receive and read e-mails between N. Yidi and B. Lee regarding for access to property			
07/12/2024	File preparation in anticipation of site visit; Site visit Villa Valencia regarding open Cabana and Parking issues; document file	Ferrera, S	1.5	525.00
07/12/2024	Call with Buyer Parties regarding Commodore PSA open issues and document file	Ferrera, S	1.5	525.00
07/12/2024	Correspond with Receiver regarding draft closing statement on Miami Beach parcel	Ferrera, S	0.4	140.00
07/13/2024	Update Commodore PSA per 7.12.24 call; prepare redline; review taxes owed on commodore and update excel spreadsheet; update PSA Exhibits	Ferrera, S	2.5	875.00
07/15/2024	Receipt and review e-mail from G. Gomez regarding tax proration and correspond with B. Lee regarding same	Ferrera, S	0.3	105.00
07/15/2024	Review various e-mails regarding Valencia updated offer; update PSA; prepare redline; prepare deed, title affidavit and assignment of parking and correspond with B. Lee regarding same; review Declaration regarding Developer's Right to assign parking and correspond with Receiver regarding same	Ferrera, S	2.0	700.00
07/16/2024	Call with receiver and coral gables regarding open items on Valencia and document file	Ferrera, S	1.0	350.00
07/16/2024	Review and comment on updated PSA and schedule of Seller closing costs regarding Miami Beach and document file	Ferrera, S	1.5	525.00
07/17/2024	Correspond with parties regarding City of Miami Beach lien issues; request updated title commitment; finalize PSA for private sale and forward to Fisher Company	Ferrera, S	1.5	525.00
07/17/2024	Correspond with B. Lee regarding file status	Ferrera, S	0.2	70.00

Day Pitney LLP

Invoice: 34306721

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
07/17/2024	Correspond with parties regarding Commodore title issues; send intro e-mail to Buyer's Counsel and FATICO	Ferrera, S	0.5	175.00
07/17/2024	Correspond with parties regarding file status; review e-mails and document file; and confer with A. Gomez regarding listing agreement matters	Ferrera, S	0.5	175.00
07/18/2024	Call with FATICO Underwriter K. Wendzel regarding various Receiver Properties and Process for Insuring Over same; correspond with Receiver parties regarding same	Ferrera, S	0.5	175.00
07/18/2024	Request lien search info from City of MB regarding city liens and document file	Ferrera, S	0.3	105.00
07/18/2024	Correspond with Buyer parties regarding preparation for closing on or before 7/29/2024	Ferrera, S	0.3	105.00
07/18/2024	Finalize PSA and Exhibits and forward to prospective Buyer, Levi Trust	Ferrera, S	1.0	350.00
07/19/2024	Brief review of Valencia property draft order; review e-mail exchanges from S. Ferrera and G. Blomeley at FATICO regarding purchaser name; review S. Ferrera e-mail regarding notice of appeal expiration for Stewart property sale; review e-mail from N. Yidi regarding buyer changing trustee; brief review of maintenance ledger for Valencia property provide by S. Ferrera to K. Wendzel; brief review of PSA as of 7.18.24; brief review of SEC requirements provided by K. Wendzel; review and organize updated title commitment received for Miami Beach property	Alvarado, N	0.4	60.00
07/19/2024	Call with Receiver parties regarding Commodore PSA; finalize Commodore PSA; prepare redline and circulate to Buyer parties	Ferrera, S	1.0	350.00
07/19/2024	Call with B. Lee regarding FATICO Title Requirements; correspond with FATICO Underwriter regarding same	Ferrera, S	1.0	350.00

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
07/22/2024	Receive and review e-mail from J. Rodriguez from Almazan Law regarding status of settlement statement; thorough review of updated title commitment and send e-mail to B. Lee with updates	Alvarado, N	0.9	135.00
07/22/2024	Review and finalize listing agreement and forward to B. Lee for review and comment	Ferrera, S	1.0	350.00
07/22/2024	Review status e-mails from prospective Buyer at Villa Valencia	Ferrera, S	0.3	105.00
07/22/2024	Receipt and review updated PSA; perform cursory review and correspond with Receiver parties regarding same	Ferrera, S	0.4	140.00
07/23/2024	Call with B. Lee and K. Wendzel at FATICO regarding title requirements on all receivership properties & document file	Ferrera, S	0.8	280.00
07/23/2024	Update Listing Agreement and forward to J. Wang regarding Valencia Unit	Ferrera, S	0.5	175.00
07/23/2024	Correspond with Valencia Association counsel regarding request additional ledgers; review e-mails from Prospective Buyer and document file	Ferrera, S	0.3	105.00
07/24/2024	Call with Receiver parties to discuss Commodore PSA; document file and send responsive e-mail to Buyer parties	Ferrera, S	1.0	350.00
07/24/2024	Review & comment on draft Motion & Order regarding Commodore Parcel	Ferrera, S	0.6	210.00
07/24/2024	Review e-mails regarding Valencia PSA offer; correspond with Receiver & Buyer regarding same	Ferrera, S	0.5	175.00
07/25/2024	Discuss incorrect proration date on ALTA with S. Ferrera; review prorations on preliminary ALTA and provide revisions to S. Ferrera; review e-mail exchanges between S. Ferrera and buyer's attorney approving closing figures	Alvarado, N	0.7	105.00
07/25/2024	Review e-mails regarding PSA status; review notes regarding Receiver call with Buyer; update PSA per Receiver notes; prepare redline and forward to Receiver for comment	Ferrera, S	0.8	280.00

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
07/25/2024	Work on pre closing matters regarding Stewart Property; review and comment on draft closing statement; Review Sale Order; correspond with Receiver and Buyer parties; update draft Closing Documents and forward to title agent	Ferrera, S	1.0	350.00
07/25/2024	Review Buyer e-mails regarding 558 claims and correspond with Receiver regarding same	Ferrera, S	0.3	105.00
07/26/2024	Brief review of Valencia property listing agreement; brief review of e-mails from S. Ferrera to FATICO regarding assessments to become lien on proceeds	Alvarado, N	0.5	75.00
07/26/2024	Review updated closing statement regarding Stewart Closing; correspond with parties regarding file status; finalize closing documents; meet with B. Lee to sign closing documents	Ferrera, S	1.5	525.00
07/26/2024	Receipt and cursory review of Miami Beach PSA; receipt and review updated Miami Beach title and forward to Lender and Receiver Parties	Ferrera, S	0.5	175.00
07/26/2024	Review status e-mails from J. Wang regarding listing agreement and N. Levi regarding PSA for Unit 1104 and document file	Ferrera, S	0.3	105.00
07/27/2024	Review Trust documents regarding Stewart Buyer and correspond with Buyer regarding changes and documents needed	Ferrera, S	0.6	210.00
07/29/2024	Review e-mail exchanges between S. Ferrera and K. Wendzel regarding receiver's requirement to pay condo assessments; review final e-mail exchanges between all parties with final changes to closing statement and seller documents approval; brief review of updated title commitment received for Miami Beach property; review e-mail exchanges between S. Ferrera and N. Yidi regarding S. Ferrera comments to Trust Documents; internal communication with A. Acosta and S. Ferrera regarding courier for delivery of original documents;	Alvarado, N	1.5	225.00

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
	review wire instructions and prepare wire request to initiate release of deposit funds to receiver			
07/29/2024	Prepare escrow agreement; review updated trust documents; correspond with closing agent regarding funding and closing matters	Ferrera, S	1.3	455.00
07/29/2024	Review updated PSA and assignment comments; update documents and prepare redlines; forward to Buyer parties for review	Ferrera, S	0.7	245.00
07/29/2024	Review updated PSA from Buyer parties; call with B. Lee and D. Rosendorf regarding PSA comments and Estate matters; document file	Ferrera, S	1.0	350.00
07/30/2024	Brief review of ledgers provided by A. Esteras for units 1201, 1104, 1301, and 1202 at the Valencia Property; review e-mail from S. Ferrera to FATICO for updated TC on Valencia property to include units 1301, 1201, 1202, review S. Ferrera request to K. Wendzel for removal of B2 items 12-13 for leases; phone call and e-mail follow up to Y. Gonzalez regarding title commitment update request for Valencia property; phone conversation with Y. Gonzalez about new title update for Valencia Property; compose new e-mail to Y. Gonzalez with title update requests for the Valencia Property	Alvarado, N	0.7	105.00
07/30/2024	Call with Buyer and Lender parties regarding Miami Beach parcel; review updated title correspond with FATICO regarding deletion of leases as exception matters	Ferrera, S	1.0	350.00
07/30/2024	Receipt and cursory review of title on Commodore; forward to receiver	Ferrera, S	0.5	175.00
07/31/2024	Review e-mail exchanges between N. Levi and S. Ferrera regarding PSA signatures for 515 Valencia Property; review buyer details for 515 Valencia Unit 1104 and redlined PSA; pull lien search and deliver to N. Levi	Alvarado, N	0.4	60.00

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
07/31/2024	Detailed review of commitment; call with B. Lee regarding open mortgages and title issues; prepare e-mail to FATICO Underwriting Counsel regarding same	Ferrera, S	1.3	455.00
07/31/2024	Work on updating Miami Beach PSA per recent call with Private Sale Buyer; call with B. Lee regarding same; prepare redline of PSA and forward to receiver parties and correspond with FATICO regarding deletion of open leases from BII matters	Ferrera, S	1.5	525.00
07/31/2024	Work on finalizing Villa Valencia PSA; worked on various versions; correspond with FATICO regarding updating title; review lien search provided to Buyer and document file	Ferrera, S	1.0	350.00
08/01/2024	Review B. Lee's follow up e-mail regarding Valencia property assessment liens attaching to sale proceeds; correspond with S. Ferrera regarding new signed contract for Valencia unit 1104; review of PSA for dates; phone conversation with Yessie about status of title commitment; calendar priority dates for monitoring	Alvarado, N	0.8	120.00
08/01/2024	Receipt and review signed PSA regarding Villa Valencia; correspond with parties regarding same; receipt and review title commitment & forward to Buyer	Ferrera, S	0.5	175.00
08/01/2024	Review status e-mails from Commodore Buyer parties and document file	Ferrera, S	0.3	105.00
08/01/2024	Review status e-mails from Miami beach buyer and document file	Ferrera, S	0.3	105.00
08/02/2024	Attend zoom call with Villa Valencia Condo Board; document file	Ferrera, S	1.6	560.00
08/03/2024	Detailed review of Villa Valencia title and prepare detailed e-mail to FATICO regarding same; correspond with Buyer of Unit 1104 regarding title inquiries and document notes from call with Villa Valencia Board Members and send to B. Lee	Ferrera, S	1.5	525.00

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
08/04/2024	Detailed review of Miami Beach Title and prepare memo to Receiver and FATICO regarding same	Ferrera, S	1.1	385.00
08/04/2024	Review listing agreement comments from realtor and receiver regarding Villa Valencia and update listing; forward to B. Lee to finalize term	Ferrera, S	0.5	175.00
08/05/2024	Correspond with City of Miami officials regarding open violations that exist on Commodore; document file	Ferrera, S	0.5	175.00
08/05/2024	Correspond with FPL reps to ascertain additional regarding Valencia street lights	Ferrera, S	0.5	175.00
08/05/2024	Detailed review of Valencia Motion & Order and provide comments to Receiver; correspond with FATICO regarding title issues	Ferrera, S	1.0	350.00
08/06/2024	Brief review of title commitment for Valencia Property	Alvarado, N	0.1	15.00
08/06/2024	Receipt and review Valencia termination notice regarding unit 1104; confer with B. Lee regarding same and document file; review updated title commitment	Ferrera, S	0.5	175.00
08/06/2024	Correspond with FPL regarding street light issues	Ferrera, S	0.5	175.00
08/06/2024	Review e-mails from Commodore Purchaser regarding assignment of leases and correspond with Receiver Parties regarding same	Ferrera, S	0.5	175.00
08/07/2024	Review e-mail exchanges for commitment revisions on Commodore and Valencia Property; discuss Valencia contract with S. Ferrera; respond to B. Lee and advise new timeline will be circulated upon receipt of new PSA	Alvarado, N	0.4	60.00
08/07/2024	Work on updating PSA for Unit 1104; call with B. Lee regarding same; review capital contribution issue; redline PSA and forward to Buyer	Ferrera, S	1.0	350.00
08/07/2024	E-mail correspondence regarding alleged pending municipal lien that has not been	Ruiz, J	0.1	35.00

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
	satisfied			
08/08/2024	Review of revised contract for Valencia property; review e-mail from B. Lee regarding motion for approval to reference RLC Funding rather than RCL Funding for the 515 Valencia property; brief review of comments from S. Ferrera for Commodore Center; acknowledge continuation of closing processing with all parties	Alvarado, N	0.5	75.00
08/08/2024	Review issues on Valencia regarding capital contributions by Buyers and surtax regarding parking garage; correspond with B. Lee regarding same; edit PSA for Buyer signing; receipt and review signed PSA; correspond with FATICO and Parties regarding file status	Ferrera, S	1.0	350.00
08/08/2024	Review e-mail from J. Alderman to MB City Counsel and document file	Ferrera, S	0.3	105.00
08/08/2024	Detailed review of Commodore Commitment issued by FATICO; correspond with K. Wendzel and examiner regarding changes needed; document file	Ferrera, S	1.0	350.00
08/09/2024	Correspond with FATICO regarding title status; confer with B. Lee regarding call with Buyer parties	Ferrera, S	0.3	105.00
08/09/2024	Correspond with parties regarding closing matters	Ferrera, S	0.3	105.00
08/11/2024	Prepare contract timeline regarding Villa Valencia	Ferrera, S	0.4	140.00
08/12/2024	Review status e-mails regarding Valencia and Miami Beach; call with B. Lee regarding Stewart	Ferrera, S	0.5	175.00
08/12/2024	Call with K. Wendzel (x2) regarding Commodore Title Issues	Ferrera, S	0.5	175.00
08/12/2024	Review correspondence from J. Alderman regarding potential municipal lien	Ruiz, J	0.1	35.00

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
08/13/2024	Review e-mails for Valencia property from N. Levi about ordering the estoppel; review e-mail exchanges between K. Wendzel and S. Ferrera for Commodore property about TC changes	Alvarado, N	0.1	15.00
08/13/2024	Call with Receiver Parties regarding Miami Beach Parcel; update PSA and prepare redline; forward to B. Lee for comment	Ferrera, S	1.0	350.00
08/14/2024	Prepare addendum to PSA regarding Villa Valencia closing date; forward to B. Lee	Ferrera, S	0.6	210.00
08/14/2024	Review status e-mails regarding call with Miami Beach City Attorney and document file	Ferrera, S	0.2	70.00
08/15/2024	Review e-mails for Valencia property about proposed addendum	Alvarado, N	0.1	15.00
08/16/2024	Review timeline for Villa Valencia; review addendum for Villa Valencia extending closing 65 days out after sale order is entered; correspond with B. Lee regarding buyer signed addendum; revised timeline based on new dates per addendum and deliver to B. Lee	Alvarado, N	0.5	75.00
08/16/2024	Call with S. Rothstein regarding city letters from City of Miami Beach; document file	Ferrera, S	0.6	210.00
08/19/2024	Review updated title commitment; review issues regarding additional units created by amended & restated DOC; confer with FATICO and Property Appraiser's office regarding same; update legal on PSA & Assignment of Leases to match Commitment; call with B. Lee regarding same	Ferrera, S	1.5	525.00
08/20/2024	Review updated title on commodore and mark up same; prepare redline and forward to FATICO; correspond with PA's office regarding condo units and legals description per amended Declaration	Ferrera, S	1.0	350.00
08/21/2024	Review of Villa Valencia motion for sale approval filed on 8.21.24 and calendar tentative hearing date	Alvarado, N	0.2	30.00

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
08/21/2024	Receipt and review e-mails regarding Miami Beach Invoices; review tenant status e-mails and correspond with B. Lee regarding same; document file	Ferrera, S	0.6	210.00
08/21/2024	Prepare e-mail to G. Mars regarding open Valencia FP&L Lighting issues	Ferrera, S	0.5	175.00
08/21/2024	Receipt and review updated Commodore title commitment; follow up with PA office regarding legal description issues; document file	Ferrera, S	0.5	175.00
08/21/2024	Review status e-mail regarding violation order and scheduling of hearing regarding same; document file	Ferrera, S	0.3	105.00
08/22/2024	Call with legal counsel at Miami Dade PA Office regarding legal on condo units regarding Commodore Parcel and document file	Ferrera, S	0.5	175.00
08/22/2024	Review updated PSA regarding Miami Beach and update same; update deed, bill of sale and prepare title affidavit; prepare redline and forward to Buyer parties	Ferrera, S	1.3	455.00
08/23/2024	Review e-mail exchanges between S. Ferrera and Y. Gonzalez regarding processing for Miami Beach property	Alvarado, N	0.2	30.00
08/27/2024	Correspond with B. Lee regarding hearing date and calendar for monitoring	Alvarado, N	0.1	15.00
08/27/2024	Receipt and review various files and document file; correspond with B. Lee regarding final updated commitment for Commodore and PA's request for site visit	Ferrera, S	0.5	175.00
08/28/2024	Review e-mail exchanges between S. Ferrera, G. Gomez, and V. Llerena at Miami-Dade County regarding amended condo declaration for commodore property; receive and review e-mail from B. Lee regarding cancellation of hearing for Valencia property	Alvarado, N	0.3	45.00
08/28/2024	Call with B. Lee; review and comment on updated commitment; review and	Ferrera, S	2.3	805.00

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
	comment on Commodore Sale Motion; correspond with FATICO regarding changes; correspond with PA office regarding issue on legal description for condo units; correspond with Buyer's counsel regarding title matters			
08/29/2024	Receive and review entered order for approval of sale for Valencia property; thoroughly review contract and addendum for deadlines; revise timeline based on order effective date and deliver to B. Lee for review; calendar new deadlines for monitoring	Alvarado, N	1.0	150.00
08/29/2024	Receipt and review various e-mails and document file; call with B. Lee regarding Commodore title inquiries; review e-mails from City of Miami attorney regarding open Commodore Violations and document file; receipt and review order on Valencia unit and confer with B. Lee regarding same	Ferrera, S	1.0	350.00
08/30/2024	Review e-mail exchange between B. Lee and N. Levi confirming 11/4/24 closing date; correspond with Y. Gonzalez from FATICO confirming closing date; brief review of execution copy of PSA for Miami Beach property	Alvarado, N	0.2	30.00
08/30/2024	Receipt and review Commodore updated title and forward to Buyer parties; update PSA for execution; correspond with B. Lee and Buyer parties regarding same	Ferrera, S	1.5	525.00
08/30/2024	Update Miami Beach PSA for execution; prepare redline and forward to Buyer parties for review; receipt and review status e-mail	Ferrera, S	0.8	280.00
08/30/2024	Work on limited access agreement for environmental matters regarding Miami Beach Property and forward to B. Lee for review and comment	Ferrera, S	0.6	210.00
08/30/2024	Receipt and review status e-mails regarding PSA timeline for Valencia sale after entry of Sale Order	Ferrera, S	0.2	70.00
09/03/2024	Organize Commodore title exceptions and discuss with S. Ferrera for review;	Alvarado, N	0.3	45.00

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
	receive and review B. Lee e-mail regarding status for Miami Beach, Commodore and Villa Valencia properties; review buyer signed Miami Beach PSA			
09/03/2024	Receipt and review signed PSA regarding Miami Beach; correspond with parties and escrow agent and document file; confer with FATICO regarding status of Motion & Order review	Ferrera, S	0.5	175.00
09/03/2024	Review status e-mails regarding Commodore PSA	Ferrera, S	0.2	70.00
09/04/2024	Review e-mails regarding Commodore PSA status; update PSA (x2); call with B. Lee; correspond with S. Goldman	Ferrera, S	1.0	350.00
09/05/2024	Review commodore e-mails; review comments to PSA; confer with B. Lee; make edits to PSA; perform redline and circulate to all parties	Ferrera, S	0.8	280.00
09/06/2024	Receive and read e-mail from B. Lee to K. Wendzel at FATICO regarding revision of party name on commitment for Commodore property; review status of contract provided by B. Lee regarding Miami Beach property; review comments to motion from K. Wendzel for Commodore sale	Alvarado, N	0.1	15.00
09/06/2024	Review signed PSA page from Buyer regarding Commodore; receipt and review various Commodore e-mails; correspond with K. Wendzel regarding title matters on Motion & Order and prepare e-mail regarding open NOV's with City of Miami for FATICO review	Ferrera, S	0.7	245.00
09/09/2024	Correspond with B. Lee regarding Commodore title matters; confer with FATICO regarding same; review and comment on order regarding legal description compared to title commitment	Ferrera, S	0.7	245.00
09/10/2024	Receipt and review updated commitment v6 regarding Commodore; forward to Buyer parties	Ferrera, S	0.5	175.00

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<u>Date</u>	<u>Description</u>	<u>Name</u>	<u>Hours</u>	<u>Amount</u>
09/10/2024	Receipt and review Sale Motion regarding Miami Beach Parcel and document file; correspond with Parties regarding deposit timing	Ferrera, S	0.3	105.00
09/11/2024	Follow up with Miami Beach Parties regarding deposit status	Ferrera, S	0.2	70.00
09/19/2024	Review status e-mails regarding Commodore motion & Miami Beach Objection filed and document file	Ferrera, S	0.4	140.00
09/19/2024	Review City Memo regarding release of funds to pay for AT&T work; document file	Ferrera, S	0.2	70.00
09/20/2024	Correspond with Commodore Parties regarding title commitment and wire transfer matters; forward executed PSA to parties; and document file	Ferrera, S	0.6	210.00
09/23/2024	Receipt and review e-mails regarding status conference update	Ferrera, S	0.2	70.00
09/24/2024	Receipt and review filed Motion; prepare PSA timeline and forward to Receiver Parties	Ferrera, S	0.5	175.00
09/25/2024	Correspond with parties regarding Commodore deposit; receipt review and forward correspondence regarding Valencia street lighting	Ferrera, S	0.3	105.00
09/27/2024	Correspond with parties regarding deposit status on Commodore	Ferrera, S	0.2	70.00
09/30/2024	Participate in zoom call with Valencia Board members	Ferrera, S	0.6	210.00

<u>Summary of Hours</u>	<u>Rank</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Sandra M. Ferrera	Partner	93.9	\$ 350	\$ 32,865.00
Joseph A. Ruiz	Counsel	0.2	350	70.00
Niurka Alvarado	Paralegal	10.7	150	1,605.00
<b>Total</b>		104.8		\$ 34,540.00

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Matter Fee \$ 34,540.00

**Matter Disbursement Summary**

Courier Service Vendor: Csz Services Inc.; Invoice#: 07; Date: 31.00  
7/31/2024 - Courier Service For Miami Office For July 2024; Client #:  
23

31.00

Matter Disbursements \$ 31.00

Total For Professional Services Rendered 34,540.00

Total Disbursements 31.00

**Total Bill** \$ 34,571.00

# **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:  
 07/01/2024-09/30/2024

FUND ACCOUNTING				
		Detail	Subtotal	Grand Total
Line 1	Beginning Balance (as of 07/01/2024)			\$2,362,278.87
	<i>Increases in Fund Balance:</i>			
Line 2	Business Income	\$10,746.45		
Line 3	Cash and Securities			
Line 4	Interest/Dividend Income	\$57,366.71		
Line 5	Business Asset Liquidation (Note 1)	\$3,238,475.34		
Line 6	Personal Asset Liquidation			
Line 7	Additional Third-Party Claims Recovery			
Line 8	Miscellaneous – Other	\$2,183.41		
	<b>Total Funds Available (Lines 1-8):</b>			<b>\$5,671,050.78</b>
	<i>Decreases in Fund Balance:</i>			
Line 9	Disbursements to Investors			
Line 10	Disbursements for Receivership Operations			
Line 10a	Disbursements to Receiver or Other Professionals			
Line 10b	Business Asset Expenses (Note 2)	\$95,438.61		
Line 10c	Personal Asset Expenses			
Line 10d	Investment Expenses			
Line 10e	Additional Third-Party Litigation Expenses			
	1. Attorney Fees			
	2. Litigation Expenses			
	Total Additional Third-Party Litigation Expenses			
Line 10f	Tax Administrator Fees and Bonds			
Line 10g	Federal and State Tax Payments	\$165.21		
Line 10h	Miscellaneous – Other			
	<b>Total Disbursements for Receivership Operations</b>			<b>\$95,603.82</b>
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	Distribution Plan Development Expenses:			
Line 11b	Distribution Plan Implementation Expenses:			
	<b>Total Disbursements for Distribution Expenses Paid by the Fund:</b>			<b>\$0.00</b>
	<b>Disbursements to Court/Other:</b>			
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees			
Line 12b	Federal Tax Payments			
	<b>Total Disbursements to Court/Other:</b>			<b>\$0.00</b>
	<b>Total Funds Disbursed (Lines 9-11):</b>			<b>\$95,603.82</b>
Line 13	Ending Balance (as of 09/30/2024):			<b>\$5,575,446.96</b>
Line 14	Ending Balance of Fund – Net Assets:			
Line 14a	Stewart Lien Claim Fund Cash	\$2,351,518.90		
Line 14b	Cash & Cash Equivalents	\$3,223,928.06		
Line 14c	Investments			
Line 14d	Other Assets or Uncleared Funds			
	<b>Total Ending Balance of Fund – Net Assets</b>			<b>\$5,575,446.96</b>
OTHER SUPPLEMENTAL INFORMATION				
		Detail	Subtotal	Grand Total
Line 15-19		N/A		

Note 1: These funds consist of the net proceeds from the sale of the Stewart Property.

Note 2: This amount includes: (a) \$79,088.16 transferred to the first position lender for the Stewart Property from the Lender Fee Reserve, (b) \$10,455.92 transferred to the first position lender for the Stewart Property as the 50/50 split of the remaining funds in the Lender Fee Reserve, and (c) and vendor payments for property maintenance, trash removal, cleaning, and plumbing.

# **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.

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

THIS CAUSE is before the Court on the Receiver's Third Interim Application to Authorize Payment of Fees and Expenses of Receiver and her Professionals (ECF No. [\_\_\_]). By the Third Fee Application, the Receiver seeks payment of fees and costs incurred by the Receiver and her professionals from July 1, 2024 through September 30, 2024 (the "Third Application Period").

The Court has considered the Third 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 Third 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 Third Application Period in the amount of \$107,905.00 are APPROVED.

3. The fees and expenses of Kozyak, Tropin & Throckmorton LLP for the Third Application Period in the amount of \$167,425.00 in fees and \$29,128.30 in expenses are APPROVED.

4. The fees and expenses of Yip Associates, Certified Public Accountants for the Third Application Period in the amount of \$6,225.00 in fees are APPROVED.

5. The fees and expenses of Day Pitney LLP for the Third Application Period in the amount of \$34,540.00 in fees and \$31.00 in expenses are APPROVED.

6. The Receiver is authorized to pay 80% of the approved fees (\$86,324.00 as to the Receiver Bernice Lee, \$133,940.00 as to Kozyak Tropin & Throckmorton LLP, \$4,980.00 as to Yip Associates, Certified Public Accountants, and \$27,632.00 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 or further order of the Court.

**DONE AND ORDERED** in Miami, Florida this \_\_\_\_ day of \_\_\_\_\_, 2024.

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**JACQUELINE BECERRA**  
**UNITED STATES DISTRICT JUDGE**

cc: counsel of record