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11 THOMAS A. SEAMAN

12 UNITED STATES DISTRICT COURT
13 CENTRAL DISTRICT OF CALIFORNIA

14
15 SECURITIES AND EXCHANGE
COMMISSION,
16 Plaintiff,

17 v.

18 EMILIO FRANCISCO; PDC CAPITAL
GROUP, LLC; CAFFE PRIMO
INTERNATIONAL, INC.; SAL ASSISTED
19 LIVING, LP; SAL CARMICHAEL, LP; SAL
CITRUS HEIGHTS, LP; SAL KERN
20 CANYON, LP; SAL PHOENIX, LP; SAL
WESTGATE, LP; SUMMERPLACE AT
21 SARASOTA, LP; SUMMERPLACE AT
CLEARWATER, LP; SUMMERPLACE AT
22 CORRELL PALMS, LP; TRC TUCSON, LP;
CLEAR CURRENTS WEST, LP; CAFFE
23 PRIMO MANAGEMENT, LP; CAFFE
PRIMO MANAGEMENT 102, LP; CAFFE
24 PRIMO MANAGEMENT 103, LP; CAFFE
PRIMO MANAGEMENT 104, LP; CAFFE
25 PRIMO MANAGEMENT 105, LP; CAFFE
PRIMO MANAGEMENT 106, LP; CAFFE
26 PRIMO MANAGEMENT 107, LP; and
CAFFE PRIMO MANAGEMENT 108, LP,
27 Defendants.

Case No. 8:16-cv-02257-CJC-DFM

**FINAL APPLICATION OF
RECEIVER'S COUNSEL,
ALLEN MATKINS LECK
GAMBLE MALLORY &
NATSIS, LLP, FOR PAYMENT
OF HOLDBACK AMOUNT; AND
FEES AND EXPENSES FOR THE
PERIOD: AUGUST 2019 -
NOVEMBER 18, 2021**

Date: January 24, 2022
Time: 1:30 p.m.
Ctm: 7C
Judge: Hon. Cormac J. Carney

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8 *SEC v. Elliot*,
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9 *SEC v. W.L*. Moody & Co., Bankers (Unincorporated)*,
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11 *United States v. Code Prods. Corp.*,
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1 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), general
2 counsel to Thomas A. Seaman ("Receiver"), the Court-appointed receiver for the
3 Defendant entities and their subsidiaries and affiliates (collectively, "Receivership
4 Entities"), hereby submits this final application for payment of the "holdback"
5 amounts from previously approved fee applications; payment of this eleventh and
6 final application for approval and payment of fees and reimbursement of expenses;
7 ("Application"). This Application covers the final period from August 1, 2019
8 through November 18, 2021 ("Eleventh Application Period"), and seeks approval of
9 \$149,967.00 in fees and \$8,026.58 in expenses.

10 From the inception of the case in January 2017, Allen Matkins has incurred
11 approved fees of \$2,063,300.40. Per this Court's orders, Allen Matkins was paid
12 80% of these fees, \$1,751,671.95 and \$412,660.08 (the "Holdback") was held back
13 pending the approval of this final fee application.

14 For the reasons described herein and the accompanying closing motion, the
15 Receiver and Allen Matkins request the Court provide final approval of the
16 Application and the Holdback.

17 I. INTRODUCTION

18 This fee application should be read in conjunction with the Receiver's Reports
19 dated March 31, 2021 and August 6, 2021 (Dkt. Nos. 389 and 398) and the
20 Receiver's Final Report filed concurrently herewith ("Final Report"), which describe
21 the Receiver's and Allen Matkins' activities during the Eleventh Application Period.
22 This Application seeks approval of \$149,967.00 in fees for a total of 212.2 hours
23 worked. The work performed is described task-by-task in Exhibit A and is broken
24 down into the following categories:

Matter	Hours	Amount
General Receivership	59.00	\$50,766.75
Asset Recovery & Management	.60	\$472.50
Investigation/Reporting	23.40	\$18,289.80

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Matter	Hours	Amount
Sale/Disposition/Transfer of Assets	34.90	\$26,262.00
Claims/Distribution	40.40	\$26,151.75
Richardson Litigation	49.00	\$28,024.20
TOTAL		\$149,967.00

As reflected in Section III below, the sum of \$412,660.08 was withheld from Allen Matkins' 10 prior fee applications pending the closing of the receivership and submission of the Final Application.

Allen Matkins has worked diligently and efficiently to assist the Receiver in carrying out his Court-ordered duties. The firm's work has allowed the Receiver to preserve and protect the value of receivership estate assets, including undeveloped land intended for development into assisted living facilities, interests in certain operating businesses and assisted living facilities, various pending litigation claims and causes of action for recovery, commercial real property located in Montana, restaurant equipment, and various other items of personal property. In addition, Allen Matkins assisted the Receiver with the administrative receivership tasks including taxes, claims disputes and distribution issues. The firm has worked diligently to assist the Receiver in carrying out his Court-ordered duties and should be compensated for its work.

Accordingly Allen Matkins requests the Court approve this Final Application and the payment of the Holdback.

II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED DURING THE ELEVENTH APPLICATION PERIOD

A. Categories and Descriptions of Work

1. General Receivership

Most of Allen Matkins' time during the Eleventh Application Period was incurred attending to general legal issues related to the closing of the case. Among other tasks, Allen Matkins responded to requests for documents and information

1 from the Securities and Exchange Commission (the “SEC”) and others pursuing
2 claims or interests outside of the receivership. This work included gathering and
3 reviewing documents for the SEC, addressing records and requests and claims
4 related to Cafe Primo, and producing documents requested by the developers
5 involved in the MCC/Lincoln Project. In addition, legal assistance was provided to
6 the Receiver with regard to the filing of the Qualified Settlement Fund tax returns
7 and the 59 separate tax returns for the Receivership Entities. Allen Matkins also
8 responded to the SEC request that the Receiver consent to judgment.

9 The reasonable and necessary fees for work in this category total \$50,766.75.

10 2. Asset Recovery & Management

11 The sole assets to be recovered by the Receiver during this period was a debt
12 arising out of the sale of the Tucson project. Allen Matkins assisted the Receiver
13 with regard to the efforts to recover the Tucson debt obligations.

14 The reasonable and necessary fees for work in this category total \$472.50.

15 3. Investigation/Reporting

16 Allen Matkins’ work during this Eleventh Application Period concerned the
17 preparation of three reports (including 2 joint reports with the SEC). Allen Matkins
18 also reviewed and responded to several third party subpoenas seeking documents and
19 electronic records, as well as requests from the SEC to produce records and
20 information. The Receiver was also asked to provide a declaration concerning the
21 SEC’s underlying lawsuit and information concerning a dispute over the ownership
22 and rights to funds held in a safe deposit box. .

23 Allen Matkins provided legal advice to the Receiver with regard to tax issues,
24 the closing of the receivership, the Receiver’s final accounting, destruction of
25 records, and the discharge. The firm also assisted the Receiver in preparing the
26 Receiver’s Final Report and motion for discharge and to close the receivership. The
27 reasonable and necessary fees for work in this category total \$18,289.80.

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1 4. Sale/Disposition/Transfer of Assets

2 This category of work includes time spent to assist the Receiver in the sale of
3 the Receivership Entities' ownership interests and rights with respect to the
4 Professional Loading Services, an ammunition manufacturing company and the
5 associated real property located in Stevensville, Montana. Allen Matkins provided
6 advice concerning the disposition of the property, inventory, and equipment. Allen
7 Matkins advised the Receiver as to various liquidation strategies for this complex
8 asset and advised the Receiver concerning the terms and structure of several offers.
9 Ultimately, a buyer for the ammunition company and the real property was found.
10 Allen Matkins documented the sale and the motion to sell the assets.

11 Allen Matkins assisted in responding to correspondence from the former
12 landlord for Caffe Primo 104 ("CP 104"), which had purchased the liquor license
13 previously held by CP 104 pursuant to a Court-approved stipulation. Counsel for the
14 former landlord explained that a hold had been placed on the license by the Franchise
15 Tax Board and requested assistance in getting information from the FTB regarding
16 how much is owed in order to remove the hold. The reasonable and necessary fees
17 for work in this category were \$26,262.00.

18 5. Claims/Distribution

19 The bulk of Allen Matkins' time during this period concerned providing legal
20 advice to the Receiver with regard to the investor and creditor claims against the
21 receivership estate and issues related to distributions. This work included advising
22 the Receiver as to claimant inquiries, addressing disputed claims of investors, and the
23 strategies and approach to distributions to overseas investors.

24 Allen Matkins and the Receiver completed their work on the Claims and
25 Distribution Motions which were argued in October 2019. The Court agreed with
26 the Receiver's recommended treatment of the investor and non-investor claims and
27 granted the Claims Motion, and approved the Distribution Plan. Following the initial
28 distribution of funds, there were significant issues related to the processing of the

1 wires and payment. Allen Matkins worked with claimants and Receiver to address
2 the issues. Allen Matkins also provided legal advice regarding claims by third
3 parties who claimed an interest in the distributions owed investors. After researching
4 and evaluating the alleged agreements and third party claims, the Receiver concluded
5 that such payments would not be made. The reasonable and necessary fees for work
6 in this category total \$26,151.75.

7 6. Richardson Litigation

8 This category includes the time spent to successfully conclude the District
9 Court litigation with Neil Richardson and his family trust. After Richardson
10 appealed this Court's the Final Judgment to the Ninth Circuit Court of Appeals,
11 additional time was spent to address issues relating to the appeal. In January 2021,
12 the Ninth Circuit Court of Appeals denied the appeal and affirmed the Court's Final
13 Judgment. The reasonable and necessary fees for work in this category total
14 \$28,024.20.

15 **B. Summary of Expenses Requested for Reimbursement**

16 Allen Matkins requests the Court approve reimbursement of \$8,026.58 in
17 out-of-pocket costs. The itemization of such expenses is summarized below by
18 category. The expenses incurred include outside vendor costs for web hosting of
19 e-discovery documents used by the Receiver to pursue claims against third parties
20 and at the request of the Securities and Exchange Commission. After consultation
21 with the Securities and Exchange Commission, the Receiver ceased maintaining the
22 cloud-based document facility [DISCO]. Costs for service of subpoenas, notices,
23 and demands to third parties and the subsequent gathering of documents in response
24 thereto are also included.

25 The total for costs incurred by Allen Matkins are broken down by category as
26 follows:

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Category	Total
Duplication/Faxes	\$0.70
Messenger fees (court messenger/FedEx)	\$227.09
Monthly Web Hosting for E-Discovery Documents	\$7,580.79
Telephonic Court Appearance	\$218.00
TOTAL	\$8,026.58

III. SCHEDULE OF FEE APPLICATIONS AND HOLDBACK

Allen Matkins has previously applied to the Court and been paid the following fees and costs on an interim basis:

Fee Application	Fees Incurred	Costs Incurred	20% Holdback of Fees	Approved and Paid
First Interim	\$362,720.70	\$17,940.60	\$72,544.14	\$308,117.16
Second Interim	\$208,980.45	\$4,475.10	\$41,796.09	\$171,659.46
Third Interim	\$244,469.25	\$8,044.82	\$48,893.85	\$203,620.22
Fourth Interim	\$298,782.00	\$9,177.04	\$59,756.40	\$248,202.64
Fifth Interim	\$287,047.35	\$10,080.97	\$57,409.47	\$239,718.85
Sixth Interim	\$194,770.80	\$10,856.47	\$38,954.16	\$166,673.11
Seventh Interim	\$109,133.10	\$8,043.97	\$21,826.62	\$95,350.45
Eighth Interim	\$112,765.95	\$9,528.49	\$22,553.19	\$99,741.25
Ninth Interim	\$205,891.65	\$14,857.59	\$41,178.33	\$179,570.91
Tenth Interim	\$38,739.15	\$3,684.58	\$7,747.83	\$39,017.90
Final Interim	\$149,967.00	\$8,026.58		
Total	\$2,213,267.40	\$104,716.21	\$412,660.08	\$1,751,671.95

As reflected above, \$412,660.08 was held back pending the conclusion of the receivership.

The total fees incurred by Allen Matkins are 12.7% of the amounts recovered by the Receiver in the receivership case. Allen Matkins discounted its hourly rate 10% and has foregone payout of the 20% holdback amount over the past 4 years. As reflected in the reports of the Receiver, this was a complex case involving overseas investors who had lost \$70,000,000, over 59 separate entities, approximately 20 properties, and numerous operating businesses including licensed assisted living

1 facilities and an ammunition manufacturer. The complex sales, tax matters and
2 receivership issues required sophisticated and experienced legal counsel.

3 The SEC has reviewed the fee applications and have no objection to the
4 payments.

5 Based on the facts and circumstances of this case, Allen Matkins' fees and
6 costs are fair and reasonable. As such, Allen Matkins requests that the Court
7 approve payment of the Holdback to Allen Matkins.

8
9 **IV. THE FEES AND COSTS ARE REASONABLE**
10 **AND SHOULD BE ALLOWED**

11 "As a general rule, the expenses and fees of a receivership are a charge upon
12 the property administered." *Gaskill v. Gordon*, 27 F. 3d 248, 251 (7th Cir. 1994).
13 These expenses include the fees and expenses of this Receiver and his professionals,
14 including Allen Matkins. Decisions regarding the timing and amount of an award of
15 fees and costs to the Receiver and his Professionals are committed to the sound
16 discretion of the Court. *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992)
17 (rev'd in part on other grounds, 998 F. 2d 922 (11th Cir. 1993)).

18 In allowing fees, a court should consider "the time, labor and skill required,
19 but not necessarily that actually expended, in the proper performance of the duties
20 imposed by the court upon the receiver[], the fair value of such time, labor and skill
21 measured by conservative business standards, the degree of activity, integrity and
22 dispatch with which the work is conducted and the result obtained." *United States v.*
23 *Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks
24 omitted). In practical terms, receiver and professional compensation thus ultimately
25 rests upon the result of an equitable, multi-factor balancing test involving the
26 "economy of administration, the burden that the estate may be able to bear, the
27 amount of time required, although not necessarily expended, and the overall value of
28 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F. 2d 232, 237 (3d Cir.

1 1970). Regardless of how this balancing test is formulated, no single factor is
2 determinative and "a reasonable fee is based [upon] all circumstances surrounding
3 the receivership." *SEC v. W.L*. Moody & Co., Bankers (Unincorporated)*,
4 374 F. Supp. 465, 480 (S.D. Tex. 1974).

5 As a preliminary matter, the Appointment Orders confer on the Receiver
6 substantial duties and powers, including to conduct such investigation and discovery
7 as is necessary to locate and account for all receivership assets, take such action as is
8 necessary and appropriate to assume control over and preserve receivership assets,
9 and employ attorneys and others to investigate and, where appropriate, institute,
10 pursue, and prosecute all claims and causes of action of whatever kind and nature.

11 The Receiver determined that experienced, qualified counsel was necessary
12 due to the size and complexity of the receivership estate and engaged Allen Matkins
13 pursuant to the authority granted to him in the Appointment Orders. Allen Matkins
14 immediately began work and has worked diligently and efficiently to assist the
15 Receiver in carrying out his Court-ordered duties. The firm has submitted a detailed
16 fee application which describes the nature of the services rendered, and the identity
17 and billing rate of each individual performing each task. The Court has previously
18 approved Allen Matkins' fee applications.

19 Allen Matkins has endeavored to staff matters as efficiently as possible while
20 remaining cognizant of the complexity of issues presented. The request for fees is
21 based on Allen Matkins' customary billing rates charged for comparable services
22 provided in other matters, less a 10% discount.

23 The work performed by Allen Matkins was essential to carrying out the
24 Receiver's Court-ordered duties. Allen Matkins has worked diligently to preserve
25 and protect the assets of the receivership estate, investigate and recover sums
26 transferred to third parties, and maximize the funds available for ultimate distribution
27 to investors. Allen Matkins' fees are fair and reasonable and should be approved and
28 paid.

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V. CONCLUSION

Allen Matkins, therefore, respectfully requests the Court enter an Order:

1. Approving Allen Matkins' fees of \$149,967.00;
2. Authorizing and directing the Receiver to pay 100% of approved fees of \$149,967.00, from the assets of the Receivership Entities;
3. Approving Allen Matkins' costs in the amount of \$8,026.58 and authorizing and directing the Receiver to reimburse such costs in full;
4. Approving payment of the Holdback amount of \$412,660.08; and
5. For such other and further relief as the Court deems appropriate.

Dated: December 17, 2021

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/ David Zaro

David R. Zaro
Attorneys for Receiver
THOMAS A. SEAMAN

EXHIBIT A

}

11/19/21 11:48:04 PROFORMA STATEMENT FOR MATTER 376462.00002 (Seaman, Thomas A./Receiver for PDC Capit) (General Receivership)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David
 Date of Last Billing: 10/28/19
 Proforma Number: 1123198

Matter #: 376462.00002

Client Name: Seaman, Thomas A./Receiver for PDC Capit
 Matter Name: General Receivership

Client/Matter Joint Group # 376462-1

Fees for Matter 376462.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
02/18/20	8007434	Calls with the Receiver related to safe deposit, taxes, AUSA discovery-accounting (.4). Follow-up on/research the issues related to BofA safe deposit box, review orders (1.0).	Zaro, David	1.40	1,102.50	1,102.50	WO	HD	TR	_____
02/20/20	8009249	Several emails with MCC concerning the documents/accounting (.4).	Zaro, David	0.40	315.00	1,417.50	WO	HD	TR	_____
02/21/20	8010241	Email follow-up with MCC concerning the documents request (.4).	Zaro, David	0.40	315.00	1,732.50	WO	HD	TR	_____
03/02/20	8025489	Email/conference with the Receiver related to the MCC document request (.4).	Zaro, David	0.40	315.00	2,047.50	WO	HD	TR	_____
03/06/20	8031596	Call/email with Receiver related to the MCC document/accounting (.4).	Zaro, David	0.40	315.00	2,362.50	WO	HD	TR	_____
03/10/20	8033032	Emails with MCC concerning accounting information, backup for the receivership entities investments into the Lincoln project.	Zaro, David	0.40	315.00	2,677.50	WO	HD	TR	_____
04/24/20	8077102	Research issues related to Cafe Primo per SEC (.4). Call with Receiver related to	Zaro, David	0.70	551.25	3,228.75	WO	HD	TR	_____

11/19/21 11:48:04 PROFORMA STATEMENT FOR MATTER 376462.00002 (Seaman, Thomas A./Receiver for PDC Capit) (General Receivership)

Fees for Matter 376462.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		taxes, claim-distribution issues and COVID-19 impacts (.3).								
04/28/20	8079107	Emails/call with Receiver and Ms. Juroe, analysis of records from the Receiver related to Charlton Lui.	Zaro, David	0.40	315.00	3,543.75	WO	HD	TR	_____
04/29/20	8079567	Emails/follow-up with Receiver and SEC counsel related to Lui docs/transactions.	Zaro, David	0.30	236.25	3,780.00	WO	HD	TR	_____
05/07/20	8089268	Address the SEC's request for records, the communication with Receiver's office related to Lui documents, background, follow-up email related to the records.	Zaro, David	0.40	315.00	4,095.00	WO	HD	TR	_____
05/18/20	8097285	Review client Receiver regarding attorney fees related to the investors.	Zaro, David	0.40	315.00	4,410.00	WO	HD	TR	_____
05/19/20	8101244	Call/email with counsel as to the claims of attorneys.	Zaro, David	0.20	157.50	4,567.50	WO	HD	TR	_____
06/01/20	8115492	Several emails related to the distribution of proceeds and follow-up with Receiver.	Zaro, David	0.40	315.00	4,882.50	WO	HD	TR	_____
08/03/20	8168975	Follow-up on the status of PDC closing tasks and the receivership tax returns, timing to conclude.	Zaro, David	0.40	322.20	5,204.70	WO	HD	TR	_____
11/10/20	8263617	Conference with Receiver related to the status of the PDC tax returns, the letter form third party claimant, and closing tasks (.4). Call with SEC counsel as to letter/injunction order (.3).	Zaro, David	0.70	563.85	5,768.55	WO	HD	TR	_____

11/19/21 11:48:04 PROFORMA STATEMENT FOR MATTER 376462.00002 (Seaman, Thomas A./Receiver for PDC Capit) (General Receivership)

Fees for Matter 376462.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/12/20	8265777	Several emails/call with SEC counsel related to third party action and the case status/judgment (.4). All/email with the Receiver related to the third party action, SEC judgment and closing tasks (.3).	Zaro, David	0.70	563.85	6,332.40	WO	HD	TR	_____
11/30/20	8280876	Evaluate several emails, follow-up on the closing tasks, letter from counsel as to the state court litigation as to defendants.	Zaro, David	0.70	563.85	6,896.25	WO	HD	TR	_____
12/04/20	8288840	Several emails/review of Jing Wang stipulation (.4). Call with SEC counsel related to Jing Wang claims/response (.2). Email to counsel for plaintiff Jing Wang as to Receiver response/joint stipulation (.5).	Zaro, David	1.10	886.05	7,782.30	WO	HD	TR	_____
12/08/20	8289810	Review several emails, revise draft Jian/Zhikun joint stipulation as to third party litigation, email to SEC counsel.	Zaro, David	0.70	563.85	8,346.15	WO	HD	TR	_____
12/10/20	8295517	Evaluate the appellate records/document to assess status of Richardson appeal (.4). Email/call with Receiver related to the appeal and taxes (.3).	Zaro, David	7.00	5,638.50	13,984.65	WO	HD	TR	_____
12/14/20	8295576	Call with counsel for the Commission and follow-up to evaluate the issues concerning the closing tasks/judgments, consents (.6). Follow-up on the joint motion from Jing Wang (.3). Call with Receiver regarding taxes/judgment (.2).	Zaro, David	1.10	886.05	14,870.70	WO	HD	TR	_____
12/15/20	8296629	Call with Receiver, follow-up on the SEC counsel's request concerning accounting to support the consent and entity judgment (.6).	Zaro, David	0.60	483.30	15,354.00	WO	HD	TR	_____

11/19/21 11:48:04 PROFORMA STATEMENT FOR MATTER 376462.00002 (Seaman, Thomas A./Receiver for PDC Capit) (General Receivership)

Fees for Matter 376462.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
12/17/20	8297291	Emails/call with Commission counsel and plaintiff's counsel related to joint motion.	Zaro, David	0.40	322.20	15,676.20	WO	HD	TR	_____
12/18/20	8302003	Emails with Jin Wang and SEC counsel concerning joint motion as to the preliminary injunction (.4). Finalize the joint stipulation to amend Preliminary Injunction order and the draft order concerning the amendment to the PI order (.8).	Zaro, David	1.20	966.60	16,642.80	WO	HD	TR	_____
12/23/20	8303428	Follow-up on the Receiver and SEC's joint stipulation, email with Receiver/counsel related to the filings.	Zaro, David	0.40	322.20	16,965.00	WO	HD	TR	_____
12/28/20	8306948	Review emails/call with counsel related to the PDC tax returns, closing tasks, SEC judgment.	Zaro, David	0.40	322.20	17,287.20	WO	HD	TR	_____
12/29/20	8306957	Review order from USDC as to stipulation/Francisco, preliminary injunction and email to Mr. Wang.	Zaro, David	0.30	241.65	17,528.85	WO	HD	TR	_____
01/05/21	8313463	Call with SEC counsel related to judgment and consent, address next steps, closing (.3).	Zaro, David	0.30	241.65	17,770.50	WO	HD	TR	_____
01/13/21	8322240	Calls with counsel and the Receiver related to the SEC judgment and Receiver/PDC consent, status of taxes/Richardson.	Zaro, David	0.40	322.20	18,092.70	WO	HD	TR	_____
01/14/21	8322266	Call with the Counsel for the SEC related to judgment s to PDC entities, consent to PDC judgment.	Zaro, David	0.20	161.10	18,253.80	WO	HD	TR	_____

11/19/21 11:48:04 PROFORMA STATEMENT FOR MATTER 376462.00002 (Seaman, Thomas A./Receiver for PDC Capit) (General Receivership)

Fees for Matter 376462.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/27/21	8333260	Follow-up with SEC counsel and Receiver as to PDC consent/judgment (.2).	Zaro, David	0.20	161.10	18,414.90	WO	HD	TR	_____
02/02/21	8350130	Emails/calls with SEC counsel and Receiver as to amount of judgment, Receiver's gross/net recovery and follow-up on consent judgment.	Zaro, David	0.40	322.20	18,737.10	WO	HD	TR	_____
02/03/21	8340050	Emails/calls with SEC counsel and Receiver as to amount of judgment, Receiver's gross/net recovery and follow-up on consent judgment.	Zaro, David	0.40	322.20	19,059.30	WO	HD	TR	_____
02/04/21	8344707	Several emails and calls with the Receiver and the counsel for the SEC as to the consent judgment/accounting for offering costs/expenses.	Zaro, David	0.60	483.30	19,542.60	WO	HD	TR	_____
02/08/21	8344779	Several emails/calls with Receiver, the SEC and investor counsel as to status of case, closing and judgment.	Zaro, David	0.30	241.65	19,784.25	WO	HD	TR	_____
02/10/21	8348429	Email/call with counsel for the SEC and the Receiver concerning the consent judgment.	Zaro, David	0.30	241.65	20,025.90	WO	HD	TR	_____
02/18/21	8354638	Several issues related to consent judgment/call with the Receiver.	Zaro, David	0.20	161.10	20,187.00	WO	HD	TR	_____
02/23/21	8358715	Email related to the status of tax returns, call with SEC counsel related to the consent judgment.	Zaro, David	0.40	322.20	20,509.20	WO	HD	TR	_____
03/08/21	8375396	Call with counsel and the Receiver, SEC counsel to address status of judgment/taxes.	Zaro, David	0.40	322.20	20,831.40	WO	HD	TR	_____

11/19/21 11:48:04 PROFORMA STATEMENT FOR MATTER 376462.00002 (Seaman, Thomas A./Receiver for PDC Capit) (General Receivership)

Fees for Matter 376462.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
03/12/21	8382786	Several emails concerning status and the closing tasks, call with SEC counsel (.4). Call with Receiver related to the status/closing tasks and taxes (.2).	Zaro, David	0.60	483.30	21,314.70	WO	HD	TR	_____
03/19/21	8388582	Conference with the Receiver related to the tax issues, reporting, and accounting.	Zaro, David	0.40	322.20	21,636.90	WO	HD	TR	_____
04/08/21	8408747	Follow-up on the PDC consent judgment and the distribution recommendation, call with SEC.	Zaro, David	0.40	322.20	21,959.10	WO	HD	TR	_____
05/06/21	8439789	Emails/calls with Receiver and the SEC counsel related to the judgment, corporate status, the closing issues and distribution.	Zaro, David	0.50	402.75	22,361.85	WO	HD	TR	_____
05/21/21	8453638	Conference with SEC counsel and follow-up on the judgment thereon (.2). Follow-up on the distribution to investors and confer with counsel (.3).	Zaro, David	0.50	402.75	22,764.60	WO	HD	TR	_____
06/08/21	8471022	Follow-u on the status of several issues related to closing of the case, distribution and SEC judgment.	Zaro, David	0.30	241.65	23,006.25	WO	HD	TR	_____
06/14/21	8476373	Emails related to SEC proposed judgment with the SEC and the Receiver.	Zaro, David	0.40	322.20	23,328.45	WO	HD	TR	_____
06/29/21	8492866	Review/evaluate the SEC turnover motion/safe deposit box (.3). Call with SEC counsel as to the judgment and timing to conclude (.3).	Zaro, David	0.60	483.30	23,811.75	WO	HD	TR	_____
07/01/21	8497186	Follow-up on the SEC judgment, the timing and review tax matters with Receiver regarding final distribution (.4). Call with	Zaro, David	0.90	753.30	24,565.05	WO	HD	TR	_____

11/19/21 11:48:04 PROFORMA STATEMENT FOR MATTER 376462.00002 (Seaman, Thomas A./Receiver for PDC Capit) (General Receivership)

Fees for Matter 376462.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		Receiver counsel related to the SEC's motion for turnover regarding Francisco safe deposit box and follow-up regarding same (.5).								
07/19/21	8512597	Several emails/call with counsel regarding documents related to the safe deposit box.	Zaro, David	0.40	334.80	24,899.85	WO	HD	TR	_____
07/20/21	8511999	Several emails related to database searches and review of SEC motion/response related to safe deposit box, follow-up as to search terms (.5). Call with Receiver and SEC counsel related to the safe deposit discovery and the SEC judgment (.5).	Zaro, David	1.00	837.00	25,736.85	WO	HD	TR	_____
07/26/21	8520219	Several emails regarding safe deposit box funds, follow-up with SEC counsel and Receiver to address discovery, records related to the box and accounts.	Zaro, David	0.70	585.90	26,322.75	WO	HD	TR	_____
07/26/21	8522826	SEARCH FOR RELEVANT DOCUMENTS TO SUPPORT MOTION TO TURN OVER ASSETS	Neglia, Ross	3.20	1,008.00	27,330.75	WO	HD	TR	_____
07/27/21	8520265	Follow-up on document review and production, email communications.	Zaro, David	0.40	334.80	27,665.55	WO	HD	TR	_____
08/05/21	8531255	Work on final revisions to the Receiver Report, follow-up email with Receiver (.6). Email, meet/confer with the SEC notice of default counsel related to the report/consent judgment (.3).	Zaro, David	0.90	753.30	28,418.85	WO	HD	TR	_____
08/11/21	8536600	Emails related to timing for case, SEC judgment, consent and follow-up.	Zaro, David	0.20	167.40	28,586.25	WO	HD	TR	_____

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Fees for Matter 376462.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/12/21	8536616	Evaluate the judgment/consent to judgment from the SEC, follow-up (.5). Call with SEC counsel related to the judgment and consent (.2). Email to the Receiver related to the SEC consent/judgment (.2).	Zaro, David	0.90	753.30	29,339.55	WO	HD	TR	_____
08/19/21	8543914	Calls with Receiver and SEC counsel related to the consent order and judgment (.4). Follow-up communications with counsel, SEC and Receiver (.3).	Zaro, David	0.70	585.90	29,925.45	WO	HD	TR	_____
08/25/21	8550385	Follow-up on SEC's consent judgment and judgment, timing and Receiver's closing tasks.	Zaro, David	0.30	251.10	30,176.55	WO	HD	TR	_____
09/20/21	8573336	Call with Receiver related to judgment and the impact upon the Sante entities (.3). Evaluate emails from Sante counsel and Sante, follow-up on SEC judgment (.6).	Zaro, David	0.90	753.30	30,929.85	WO	HD	TR	_____
10/01/21	8590584	Follow-up with Receiver regarding judgment, receiver accounting and closing motion, follow-up regarding same.	Zaro, David	0.40	334.80	31,264.65	WO	HD	TR	_____
11/01/21	8623369	Conference with Receiver concerning taxes, the distribution and the final motions/closing issues (.3). Follow-up on the final accounting, drafts of the closing motions (.4).	Zaro, David	0.70	585.90	31,850.55	WO	HD	TR	_____
11/02/21	8623403	Work on the Receive report and fee applications related to the closing motion.	Zaro, David	0.70	585.90	32,436.45	WO	HD	TR	_____
11/03/21	8625574	Work with counsel and address final distributions, follow-up with Receiver.	Zaro, David	0.60	502.20	32,938.65	WO	HD	TR	_____

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Fees for Matter 376462.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/04/21	8628585	Review Receiver reports and pleadings, then outline brief, work on draft of the Receiver motion to conclude the receivership and discharge the Receiver.	Zaro, David	1.60	1,339.20	34,277.85	WO	HD	TR	_____
11/05/21	8630068	Work on drafts of briefing to conclude the receivership, review prior reports, follow-up to meet with Receiver and counsel as to narrative.	Zaro, David	2.10	1,757.70	36,035.55	WO	HD	TR	_____
11/09/21	8632603	Draft the notice of motion/motion regarding discharge, draft the final report, fee application and memorandum of points and authorities in support of closing motion and discharge (1.9). Conferences with Receiver and counsel regarding closing motion (.6). Emails related to the closing motion (.3).	Zaro, David	2.80	2,343.60	38,379.15	WO	HD	TR	_____
11/10/21	8632711	Work on the Receiver's final report, including research and revisions to the draft (1.3). Work on Receiver's memorandum of points and authorities in support of closing of receivership, discharge of receiver and revisions to draft (1.6).	Zaro, David	1.90	1,590.30	39,969.45	WO	HD	TR	_____
11/11/21	8632748	Further revisions to the memo of points and authorities and the Receiver's final report (1.4). Conference with Receiver related to the draft closing motion and Report (.4). Revise final fee applications (.7).	Zaro, David	2.50	2,092.50	42,061.95	WO	HD	TR	_____
11/12/21	8632732	Analysis and further research as to tax liability, Receiver's discharge and follow-up regarding same (1.8). Further revisions to draft memorandum of points and authorities	Zaro, David	5.50	4,603.50	46,665.45	WO	HD	TR	_____

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Fees for Matter 376462.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		in support of closing motions (2.7). Calls/emails with Receiver related to the closing motions and Receiver application (1.0).								
11/15/21	8635741	Call with Receiver related to the closing motion, final accounting, taxes and follow-up (.3). Work on draft of the Receiver's declaration, follow-up call with Receiver as to declaration (.8).	Zaro, David	1.10	920.70	47,586.15	WO	HD	TR	_____
11/16/21	8637005	Work on draft of Receiver declaration, revise pleadings (.4). Email to Receiver regarding the briefs/follow-up with counsel as to finalizing application (.4).	Zaro, David	0.80	669.60	48,255.75	WO	HD	TR	_____

Disbursements for Matter 376462.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	Circle	Action		
04/10/19	156521	DCSRCH – Document Search - - WellsOne, 4/01/2019-6/30/2019^4406104-Q22019^4406104Q22019	1.00	12.40	WO	HD	TR	_____
08/01/19	88136	MSNGR – Messenger - - Nationwide Legal, LLC, USDC CENTRAL DISTRICT, DELIVER COURTESY 7/02/19 ^195887	1.00	95.50	WO	HD	TR	_____
08/21/19	30869	MSNGR – Messenger - - Nationwide Legal, LLC, USDC CENTRAL DISTRICT^198032	1.00	4.00	WO	HD	TR	_____
09/20/19	142108	MSNGR – Messenger - - Nationwide Legal, LLC, ^199512	1.00	4.00	WO	HD	TR	_____
09/20/19	154903	PARK – Parking - - Parking, parking at USDC, Central District of California - attend hearing on Receiver's Motion to Approve Distribution Plan^CRE-300313	1.00	18.00	WO	HD	TR	_____
09/26/19	23775	MSNGR – Messenger - - Nationwide Legal, LLC, ^293892	1.00	91.05	WO	HD	TR	_____
02/01/20	180797	TECH – Tech Other Service - - CS Disco Inc., Monthly Hosting	1.00	2,526.93	WO	HD	TR	_____

11/19/21 11:48:04 PROFORMA STATEMENT FOR MATTER 376462.00002 (Seaman, Thomas A./Receiver for PDC Capit) (General Receivership)

Disbursements for Matter 376462.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt					
02/05/20	190033	for February 2020^77231 COURTC – Telephonic Court Appearance - - CourtCall, LLC, OC Superior Court - Judge Derek W. Hunt^10368707	1.00	94.00	WO	HD	TR	_____	
02/10/20	105725	DCSRCH – Document Search - - WellsOne, PACER ^10/01/2019-12/31/2019 AP CARD^4406104Q42019	1.00	0.80	WO	HD	TR	_____	
02/10/20	190034	COURTC – Telephonic Court Appearance - - CourtCall, LLC, OC Superior Court - Judge Derek W.Hunt^10377520	1.00	94.00	WO	HD	TR	_____	
04/06/20	2649734	DCSRCH – Pacer 0120 - 03/20 Usage	0.00	0.10	WO	HD	TR	_____	
05/11/20	2649410	WP – Create/Edit/Revise Word Documents	0.40	12.00	WO	HD	TR	_____	
07/09/20	2654705	WP – Create/Edit/Revise Word Documents	0.80	24.00	WO	HD	TR	_____	
09/30/20	2684727	DCSRCH – Document Search - - PACER - 07/20 -9/20 Usage	0.00	2.20	WO	HD	TR	_____	
12/18/20	2686878	WP – Transcription - Big Hand	0.60	18.00	WO	HD	TR	_____	
12/23/20	2683915	BW – Duplication - Black & White Copies	11.00	1.10	WO	HD	TR	_____	
02/10/21	2701758	DCSRCH – Document Search - - PACER - 10/20 -12/20 Usage	0.00	0.40	WO	HD	TR	_____	
02/10/21	2701759	DCSRCH – Document Search - - PACER - 10/20 -12/20 Usage	0.00	1.00	WO	HD	TR	_____	
03/23/21	2702079	WP – Create/Edit/Revise Word Documents	0.30	9.00	WO	HD	TR	_____	
03/24/21	2703316	WP – Create/Edit/Revise Word Documents	0.70	21.00	WO	HD	TR	_____	
03/31/21	2702277	BW – Duplication - Black & White Copies	19.00	1.90	WO	HD	TR	_____	
03/31/21	2712018	POST – Postage - RICOH - 1 large envelope	0.00	1.60	WO	HD	TR	_____	
05/10/21	2719158	DCSRCH – Document Search - - PACER - 1/21 -3/21 Usage	0.00	1.80	WO	HD	TR	_____	
07/19/21	2727945	MSNGR – Messenger - Nationwide Legal LLC - JASON	0.00	65.10	WO	HD	TR	_____	

11/19/21 11:48:04 PROFORMA STATEMENT FOR MATTER 376462.00002 (Seaman, Thomas A./Receiver for PDC Capit) (General Receivership)

Disbursements for Matter 376462.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt
Proforma Summary				
Timekeeper				
Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	6.20	787.50	4,882.50
000313	Zaro, David	23.50	805.50	18,929.25
000313	Zaro, David	28.00	837.00	23,436.00
002448	Neglia, Ross	3.20	315.00	1,008.00
		60.90		\$48,255.75
Subtotal Fees				\$48,255.75
Discount				0.00
Total Fees				48,255.75
Total Disbursements				3,099.88

Attorney Billing Instructions

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

Billing Instructions

expires 12/31/2021: 10% OFF STANDARD RATES (AUTOMATIC); no text editing; copies @ .10; rate freeze until 1/31/18

Account Summary – As Of 11/19/21

	Fiscal YTD		Calendar YTD				LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	24,444.00	24,444.00	0.00	30,828.70	30,726.90	101.80	176,199.17	93,005.10	83,194.07
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	222.75	222.75	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	44,526.60	44,526.60	80,094.19
Collected	0.00	0.00	0.00	0.00	0.00	0.00	124,620.79	44,526.60	80,094.19
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						

11/19/21 11:48:04 PROFORMA STATEMENT FOR MATTER 376462.00002 (Seaman, Thomas A./Receiver for PDC Capit) (General Receivership)

WIP	51,355.63	48,255.75	3,099.88
Balance			
AR Balance	0.00	0.00	0.00
Unalloc	0.00		
Payment			
Client Trust	0.00		
Balance			

Billing Address

Seaman, Thomas A./Receiver for PDC Capital Group, LLC; Caffè Primo
International
SEAMAN, THOMAS (Receiver)
1 Park Plaza, Suite 580
Irvine, CA 92614

}
 11/19/21 11:48:06 PROFORMA STATEMENT FOR MATTER 376462.00003 (Seaman, Thomas A./Receiver for PDC Capit) (Asset Recovery & Management)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David Matter #: 376462.00003 Client Name: Seaman, Thomas A./Receiver for PDC Capit
 Date of Last Billing: 10/28/19 Matter Name: Asset Recovery & Management
 Proforma Number: 1123198
 Client/Matter Joint Group # 376462-1

Fees for Matter 376462.00003.(Asset Recovery & Management)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
08/02/19	34415	Call with Receiver related to the collection of note, timing, prospects for recovery (.2).	Zaro, David	0.20	157.50	157.50	WO	HD TR
08/20/19	69454	Analysis of both the Tucson and Phoenix transaction, closing, the outstanding notes, obligations and approach to collection and timing.	Zaro, David	0.40	315.00	472.50	WO	HD TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.60	787.50	472.50
		0.60		\$472.50
Subtotal Fees				\$472.50
Discount				0.00
Total Fees				472.50
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL () Hold
 () BILL FEES ONLY () Write Off

11/19/21 11:48:06 PROFORMA STATEMENT FOR MATTER 376462.00003 (Seaman, Thomas A./Receiver for PDC Capit) (Asset Recovery & Management)

() BILL COST ONLY

() Transfer All

Billing Instructions

expires 12/31/2021: 10% OFF STANDARD RATES (AUTOMATIC); no text editing; copies @ .10; rate freeze until 1/31/18

Account Summary – As Of 11/19/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	0.00	0.00	0.00	196,436.70	196,436.70	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	1,093.50	1,093.50	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	194,870.70	194,870.70	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	194,870.70	194,870.70	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	472.50	472.50	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Seaman, Thomas A./Receiver for PDC Capital Group, LLC; Caffè Primo
 International
 SEAMAN, THOMAS (Receiver)
 1 Park Plaza, Suite 580
 Irvine, CA 92614

}

11/19/21 11:48:08 PROFORMA STATEMENT FOR MATTER 376462.00004 (Seaman, Thomas A./Receiver for PDC Capit) (Investigation/Reporting)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David

Matter #: 376462.00004

Client Name: Seaman, Thomas A./Receiver for PDC Capit

Date of Last Billing: 10/28/19

Matter Name: Investigation/Reporting

Proforma Number: 1123198

Client/Matter Joint Group # 376462-1

Fees for Matter 376462.00004.(Investigation/Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/06/19	28037	Initial work on Receiver's 11th interim report.	Fates, Edward (Ted)	0.40	237.60	237.60	WO	HD	TR	_____
08/15/19	82385	Call with SEC counsel concerning the maintenance of documents, email, Richardson state court matter.	Zaro, David	0.30	236.25	473.85	WO	HD	TR	_____
08/27/19	126470	Follow-up correspondence regarding bank subpoenas.	Griffin, Peter	0.40	178.20	652.05	WO	HD	TR	_____
09/09/19	62568	Revisions to Receiver's 11th interim report.	Fates, Edward (Ted)	1.30	772.20	1,424.25	WO	HD	TR	_____
09/17/19	57531	Meet and confer communications with SEC counsel regarding Receiver's 11th interim report.	Fates, Edward (Ted)	0.20	118.80	1,543.05	WO	HD	TR	_____
10/03/19	115521	Call/email with Receiver and SEC counsel related to the records and Ferrante.	Zaro, David	0.30	236.25	1,779.30	WO	HD	TR	_____
10/22/19	120816	Conference with SEC counsel related to the Receiver accounting, and declaration.	Zaro, David	0.30	236.25	2,015.55	WO	HD	TR	_____

11/19/21 11:48:08 PROFORMA STATEMENT FOR MATTER 376462.00004 (Seaman, Thomas A./Receiver for PDC Capit) (Investigation/Reporting)

Fees for Matter 376462.00004.(Investigation/Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/08/19	46050	Call with Receiver concerning the report to the court re tax issues, closing tasks and distribution (.2). Follow-up concerning stay of receivership and FRCP/Local Rules (.4).	Zaro, David	0.60	472.50	2,488.05	WO	HD	TR	_____
11/13/19	47861	Email from SEC counsel concerning discovery, Receiver testimony/privilege (.3). Follow-up call with Receiver and counsel, research the PDC records (.5).	Zaro, David	0.80	630.00	3,118.05	WO	HD	TR	_____
11/18/19	80622	Conference with the SEC counsel related to the Ferrante trial, Receiver testimony/declaration (.3). Work on Receiver declaration/issues (.8).	Zaro, David	1.10	866.25	3,984.30	WO	HD	TR	_____
11/19/19	92425	Call with the Receiver related to the declaration of the Receiver (.3). Follow-up calls with the Receiver and SEC counsel re Receiver declaration and records (.2).	Zaro, David	0.50	393.75	4,378.05	WO	HD	TR	_____
12/02/19	68531	Calls with the SEC counsel and Receiver related to SEC's motion for summary judgment filing, the receivership and upcoming trial/witness testimony (.4).	Zaro, David	0.40	315.00	4,693.05	WO	HD	TR	_____
12/11/19	136423	Call with SEC counsel and follow-up on the Receiver accounting/discovery (.4).	Zaro, David	0.40	315.00	5,008.05	WO	HD	TR	_____
02/03/20	7995059	Call/email with SEC counsel related to third party claimant and Francisco, stay and response to request (.4).	Zaro, David	0.40	315.00	5,323.05	WO	HD	TR	_____
02/19/20	8008752	Emails to/from counsel at MCC-Overseas related to MCC/Lincoln loan records, project information (.4). Investigate the MCC/Lincoln project records/emails (.5).	Zaro, David	0.90	708.75	6,031.80	WO	HD	TR	_____

11/19/21 11:48:08 PROFORMA STATEMENT FOR MATTER 376462.00004 (Seaman, Thomas A./Receiver for PDC Capit) (Investigation/Reporting)

Fees for Matter 376462.00004.(Investigation/Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
03/03/20	8028164	Call/email with Receiver related to PDC and the MCC records (.4).	Zaro, David	0.40	315.00	6,346.80	WO	HD	TR	_____
03/09/20	8032893	Review of document/report from Receiver related to the MCC/Lincoln project and email to MCC related to report.	Zaro, David	0.40	315.00	6,661.80	WO	HD	TR	_____
07/27/20	8156973	Gather information re: Mpoint entities per request from A. Juroe	Fates, Edward (Ted)	0.20	122.40	6,784.20	WO	HD	TR	_____
09/10/20	8202818	Several emails/call with the Receiver related to the PDC report and taxes.	Zaro, David	0.40	322.20	7,106.40	WO	HD	TR	_____
09/15/20	8207238	Conference with Receiver related to the joint report, the accounting and pre/post receivership tax returns.	Zaro, David	0.40	322.20	7,428.60	WO	HD	TR	_____
09/16/20	8207291	Several calls/emails with SEC counsel and Receiver related to joint report (.3). Work on draft of joint report, assess Richardson, taxes and distribution status (1.0).	Zaro, David	1.30	1,047.15	8,475.75	WO	HD	TR	_____
09/17/20	8214749	Call with the Receiver concerning the joint report, follow-up and advice (.2). Work on revisions to the draft joint report, follow-up emails and call (.7).	Zaro, David	0.90	724.95	9,200.70	WO	HD	TR	_____
09/18/20	8212802	Call with Commission counsel related to joint report to the Court (.2). Finalize the report and prepare exhibit, filing of the SEC/Receiver Joint Report (.4).	Zaro, David	0.60	483.30	9,684.00	WO	HD	TR	_____
03/22/21	8388690	Calls with counsel for SEC and Receiver related to report, the distribution and follow-up regarding same (.6). Work on draft of	Zaro, David	1.20	966.60	10,650.60	WO	HD	TR	_____

11/19/21 11:48:08 PROFORMA STATEMENT FOR MATTER 376462.00004 (Seaman, Thomas A./Receiver for PDC Capit) (Investigation/Reporting)

Fees for Matter 376462.00004.(Investigation/Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		the Receiver Report (.6).								
03/23/21	8391278	Work on the draft of the report, follow-up with Receiver s to taxes, recovery, closing and accounting.	Zaro, David	0.40	322.20	10,972.80	WO	HD	TR	_____
03/24/21	8391285	Call with Receiver, then further revisions to the draft of the Receiver Report.	Zaro, David	0.80	644.40	11,617.20	WO	HD	TR	_____
03/26/21	8393202	Conferences with the Receiver tax letter, sale taxes, report/accounting issues.	Zaro, David	0.60	483.30	12,100.50	WO	HD	TR	_____
03/29/21	8395331	Email/call with the Receiver related to the Receiver and SEC report.	Zaro, David	0.20	161.10	12,261.60	WO	HD	TR	_____
03/30/21	8397394	Call to SEC counsel concerning consent judgment and the report as to distribution issues (.3). Call/emails with the Receiver related to taxes, report, and follow-up regarding same (.8).	Zaro, David	1.10	886.05	13,147.65	WO	HD	TR	_____
03/31/21	8399748	Call/email with Receiver related to accounting and distribution timing (.3). Several emails with the SEC, review comments to joint report/respond (.4). Call with SEC counsel and follow-up email regarding same (.2).	Zaro, David	0.90	724.95	13,872.60	WO	HD	TR	_____
05/26/21	8457970	Email/call related to the Merced property (.3). Review pleadings and order regarding abandonment, call/email to Receiver (.3).	Zaro, David	0.60	483.30	14,355.90	WO	HD	TR	_____
07/15/21	8512690	Follow-up with Receiver as to safe deposit box filings; Emails regarding same and then review files for records (.8); Call with Receiver related to the documents/safe	Zaro, David	1.10	920.70	15,276.60	WO	HD	TR	_____

11/19/21 11:48:08 PROFORMA STATEMENT FOR MATTER 376462.00004 (Seaman, Thomas A./Receiver for PDC Capit) (Investigation/Reporting)

Fees for Matter 376462.00004.(Investigation/Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
07/20/21	8511998	Review of Receiver Report, evaluate status of the Receiver's distribution, timing for closure, taxes and follow-up (.3). Call with Receiver counsel related to the report/timing for the discharge motion (.3).	Zaro, David	0.60	502.20	15,778.80	WO	HD	TR	_____
07/22/21	8514124	Follow-up on the records review regarding bank safe deposit funds and receiver's accounting regarding funds.	Zaro, David	0.30	251.10	16,029.90	WO	HD	TR	_____
08/03/21	8528391	Call with the Receiver related to the Receiver report, discharge motion, final distribution and tax issues.	Zaro, David	0.70	585.90	16,615.80	WO	HD	TR	_____
08/04/21	8531244	Work on the draft of the Receiver's Report and follow-up regarding same (.7). Call with SEC counsel related to consent judgment and Receiver Report/closing (.4). Several emails and call with counsel/Receiver, follow-up on distribution, closing motion (.5).	Zaro, David	1.60	1,339.20	17,955.00	WO	HD	TR	_____
08/06/21	8534528	Call/email with Receiver related to the Receiver's Report, the SEC consent judgment (.4).	Zaro, David	0.40	334.80	18,289.80	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	6.80	787.50	5,355.00
000313	Zaro, David	9.40	805.50	7,571.70
000313	Zaro, David	4.70	837.00	3,933.90
001665	Fates, Edward (Ted)	1.90	594.00	1,128.60

11/19/21 11:48:08 PROFORMA STATEMENT FOR MATTER 376462.00004 (Seaman, Thomas A./Receiver for PDC Capit) (Investigation/Reporting)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.20	612.00	122.40
002209	Griffin, Peter	0.40	445.50	178.20
		23.40		\$18,289.80
Subtotal Fees				\$18,289.80
Discount				0.00
Total Fees				18,289.80
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 12/31/2021: 10% OFF STANDARD RATES (AUTOMATIC); no text editing; copies @ .10; rate freeze until 1/31/18

Account Summary – As Of 11/19/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	3,933.90	3,933.90	0.00	8,605.80	8,605.80	0.00	442,352.99	421,415.55	20,937.44
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	2,172.06	2,172.06	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	402,163.29	402,163.29	20,937.44
Collected	0.00	0.00	0.00	0.00	0.00	0.00	423,100.73	402,163.29	20,937.44
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	18,289.80	18,289.80	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

11/19/21 11:48:08 PROFORMA STATEMENT FOR MATTER 376462.00004 (Seaman, Thomas A./Receiver for PDC Capit) (Investigation/Reporting)

Billing Address

Seaman, Thomas A./Receiver for PDC Capital Group, LLC; Caffe Primo
International
SEAMAN, THOMAS (Receiver)
1 Park Plaza, Suite 580
Irvine, CA 92614

}

11/19/21 11:48:09 PROFORMA STATEMENT FOR MATTER 376462.00006 (Seaman, Thomas A./Receiver for PDC Capit) (Sale/Disposition/Transfer of Assets)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David
 Date of Last Billing: 12/31/19
 Proforma Number: 1123198

Matter #: 376462.00006

Client Name: Seaman, Thomas A./Receiver for PDC Capit
 Matter Name: Sale/Disposition/Transfer of Assets

Client/Matter Joint Group # 376462-1

Fees for Matter 376462.00006.(Sale/Disposition/Transfer of Assets)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/02/19	34417	Call with Receiver related to sale of Montana assets (.2).	Zaro, David	0.20	157.50	157.50	WO	HD	TR	_____
08/05/19	105282	Discuss issues with FTB and hold placed on liquor license with A. Juroe.	Fates, Edward (Ted)	0.40	237.60	395.10	WO	HD	TR	_____
08/06/19	40802	Several calls with Receiver concerning the terms of the Montana sale transaction, advice to Receiver (.4).	Zaro, David	0.40	315.00	710.10	WO	HD	TR	_____
08/07/19	28116	Analyze issues regarding disposition of ammunition inventory/equipment and related Montana real property, confer with counsel regarding same (.3); communications with A. Juroe and counsel for former CP 104 landlord regarding FTB tax claims, hold placed on liquor license, and resolution of same (.8).	Fates, Edward (Ted)	1.10	653.40	1,363.50	WO	HD	TR	_____
08/07/19	47237	Conferences with counsel and the Receiver re terms of sale/auction process, follow-up as to ammunition company/property sale and strategy for asset sale/auction (.6).	Zaro, David	0.60	472.50	1,836.00	WO	HD	TR	_____

11/19/21 11:48:09 PROFORMA STATEMENT FOR MATTER 376462.00006 (Seaman, Thomas A./Receiver for PDC Capit) (Sale/Disposition/Transfer of Assets)

Fees for Matter 376462.00006.(Sale/Disposition/Transfer of Assets)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/08/19	34434	Follow up communications with counsel for former CP 104 landlord.	Fates, Edward (Ted)	0.20	118.80	1,954.80	WO	HD	TR	_____
08/08/19	67201	Conference with Receiver, email related to the negotiations with potential buyers/alternative approaches (.4). Analysis of issues related to private asset sale (.3). Call with Receiver re distribution plan, declaration, taxes (.3). Revise draft Receiver declaration, related issues (.6).	Zaro, David	1.60	1,260.00	3,214.80	WO	HD	TR	_____
08/09/19	47303	Call with A. Juroe regarding status on FTB and liquor license issues, communications with counsel for former CP 104 landlord regarding same.	Fates, Edward (Ted)	0.40	237.60	3,452.40	WO	HD	TR	_____
08/15/19	80708	Communications with A. Juroe and counsel for former CP 104 landlord regarding hold on liquor license and resolution of same.	Fates, Edward (Ted)	0.20	118.80	3,571.20	WO	HD	TR	_____
08/15/19	82386	Conferences with counsel and Receiver concerning the auction sale of ammunition company and property.	Zaro, David	0.40	315.00	3,886.20	WO	HD	TR	_____
08/20/19	69455	Emails/call with potential purchaser of Montana investor, equipment and real property (.4). Email to Receiver and review of documents from potential buyer, buyer related claims (.2).	Zaro, David	0.60	472.50	4,358.70	WO	HD	TR	_____
08/21/19	69602	Review/analysis of pro-loading documents, George Clayton records and assess response (.4). Revise response to Clayton re: equipment and call with Receiver re same (.6).	Zaro, David	1.00	787.50	5,146.20	WO	HD	TR	_____

11/19/21 11:48:09 PROFORMA STATEMENT FOR MATTER 376462.00006 (Seaman, Thomas A./Receiver for PDC Capit) (Sale/Disposition/Transfer of Assets)

Fees for Matter 376462.00006.(Sale/Disposition/Transfer of Assets)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/27/19	76149	Communications with A. Juroe regarding liquor license and FTB tax issues.	Fates, Edward (Ted)	0.20	118.80	5,265.00	WO	HD	TR	_____
08/28/19	19952	Respond to inquiry from counsel for former CP 104 landlord regarding hold on liquor license and tax issues.	Fates, Edward (Ted)	0.20	118.80	5,383.80	WO	HD	TR	_____
08/29/19	84631	Email/follow-up on the Montana ammunition company sale and sale of real estate, call to Receiver and counsel (.4). Analysis of auction process/potential issues related to federal excise taxes and confer with tax counsel (.3).	Zaro, David	0.70	551.25	5,935.05	WO	HD	TR	_____
08/30/19	126395	Emails/call with Receiver concerning the Cummins offer and Receiver counter (.6).	Zaro, David	0.60	472.50	6,407.55	WO	HD	TR	_____
09/03/19	126883	Follow-up on the Professional Loading Services, property sale auction and emails, counter proposal from Cummins (.4). Call with counsel concerning the sale terms and tax issues (.2).	Zaro, David	0.60	472.50	6,880.05	WO	HD	TR	_____
09/04/19	126861	Email/call with Receiver concerning the negotiations and terms of proposed offer to Cummins (.4). Several emails with Mr. McDonnell as to Professional Loading Sale and treatment of claims/tax issues (.3).	Zaro, David	0.70	551.25	7,431.30	WO	HD	TR	_____
09/06/19	130869	Emails from purchaser/Cummins and follow up with Receiver related to potential sale (.4).	Zaro, David	0.40	315.00	7,746.30	WO	HD	TR	_____
09/09/19	55817	Address the sale, emails with Montana counsel related to interim and final terms	Zaro, David	1.60	1,260.00	9,006.30	WO	HD	TR	_____

11/19/21 11:48:09 PROFORMA STATEMENT FOR MATTER 376462.00006 (Seaman, Thomas A./Receiver for PDC Capit) (Sale/Disposition/Transfer of Assets)

Fees for Matter 376462.00006.(Sale/Disposition/Transfer of Assets)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		and agreement (.6). Call with Receiver concerning sale terms/email to buyer's counsel (.4). Several emails and calls with counsel/potential buyer related to the sale and PSA terms (.4). Call with Receiver re counter proposal/documents (.2).								
09/09/19	56172	Review emails and documentation regarding proposed terms of sale of Professional Loading Service, LLLP business. Commence outlining agreement.	Hall, Debra	1.40	1,001.70	10,008.00	WO	HD	TR	_____
09/10/19	61862	Numerous emails and calls with counsel, Receiver, and Mr. Reely concerning the negotiations as to the sale of ammunition manufacturing company and related real property/follow up thereon (.6). Follow up to compose and review further client emails/emails with potential buyer and calls (.8).	Zaro, David	1.40	1,102.50	11,110.50	WO	HD	TR	_____
09/11/19	55848	Work on drafting Purchase and Sale Agreement for sale of interests in Professional Loading Service, LLLP.	Hall, Debra	2.20	1,574.10	12,684.60	WO	HD	TR	_____
09/11/19	56205	Call/emails related to sale of equity in the Professional Loading Services (.5). Follow up with Receiver and counsel related to the sale/terms and agreement (.3)	Zaro, David	0.80	630.00	13,314.60	WO	HD	TR	_____
09/12/19	57558	Emails/calls with counsel related to sale, follow-up with Receiver as to terms of the sale agreement (.6).	Zaro, David	0.60	472.50	13,787.10	WO	HD	TR	_____
09/12/19	62844	Finalize Purchase and Sale Agreement for sale of interests in Professional Loading	Hall, Debra	3.30	2,361.15	16,148.25	WO	HD	TR	_____

11/19/21 11:48:09 PROFORMA STATEMENT FOR MATTER 376462.00006 (Seaman, Thomas A./Receiver for PDC Capit) (Sale/Disposition/Transfer of Assets)

Fees for Matter 376462.00006.(Sale/Disposition/Transfer of Assets)

Trans Date	Index	Description of Service Rendered Service, LLLP.	Timekeeper	Hours	Fees	Sum	Circle	Action		
09/13/19	57563	Several emails/advice to counsel related to the sale of Professional Loading Service (.4). Review of terms of sale agreement, releases and indemnity issues (.4).	Zaro, David	0.80	630.00	16,778.25	WO	HD	TR	_____
09/13/19	62845	Emails regarding and call with Thomas Seaman regarding Purchase and Sale Agreement for sale of interests in Professional Loading Service, LLLP.	Hall, Debra	0.80	572.40	17,350.65	WO	HD	TR	_____
09/16/19	62800	Analysis of the purchase and sale agreement, draft of the motion to sell the Professional Loading Service interests.	Zaro, David	1.90	1,496.25	18,846.90	WO	HD	TR	_____
09/17/19	35828	Work on draft of Receiver motion to sell PLS interests, follow-up on Receiver declaration and proposed order (1.0). Email/call with Receiver, further call with Receiver re motion (.4). Call with counsel related to PSA and motion (.3).	Zaro, David	1.70	1,338.75	20,185.65	WO	HD	TR	_____
09/17/19	57532	Communications with counsel for former CP 104 landlord and A. Juroe regarding FTB hold on liquor license.	Fates, Edward (Ted)	0.20	118.80	20,304.45	WO	HD	TR	_____
09/18/19	35811	Call/email related to the Professional Loading Service motion, email with the SEC, meet/confer.	Zaro, David	0.40	315.00	20,619.45	WO	HD	TR	_____
09/19/19	60936	Draft Declaration of Thomas Seaman in support of the motion to sell interests in PLS (.8). Revise draft declaration, memo of points and authorities, further revisions to sale brief (1.1). Emails with SEC and	Zaro, David	2.20	1,732.50	22,351.95	WO	HD	TR	_____

11/19/21 11:48:09 PROFORMA STATEMENT FOR MATTER 376462.00006 (Seaman, Thomas A./Receiver for PDC Capit) (Sale/Disposition/Transfer of Assets)

Fees for Matter 376462.00006.(Sale/Disposition/Transfer of Assets)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		Receiver related to sale motion, meet/confer (.4).								
09/20/19	55397	Communications with SEC, meet/confer re sale motion (.2). Final revisions/call with Receiver to address Receiver declaration and Motion (.6). Work on draft order/exhibits to sale motion (.4). Calls/emails with Receiver concerning the sale (.4).	Zaro, David	1.60	1,260.00	23,611.95	WO	HD	TR	_____
10/11/19	111028	Communications with A. Juroe and counsel for CP 104 landlord regarding resolution of liquor license transfers and FTB hold.	Fates, Edward (Ted)	0.20	118.80	23,730.75	WO	HD	TR	_____
10/16/19	110545	Call with counsel for CP 104 landlord regarding liquor license hold and FTB tax issues.	Fates, Edward (Ted)	0.20	118.80	23,849.55	WO	HD	TR	_____
10/24/19	112771	Follow-up on the sale of ammunition manufacturing, property, advice as to the anticipated closing and title issues (.6).	Zaro, David	0.60	472.50	24,322.05	WO	HD	TR	_____
10/28/19	95485	Review of the Court's order related to sale of PLS, follow-up email, call with counsel and Receive regarding closing of PLS sale (.7).	Zaro, David	0.70	551.25	24,873.30	WO	HD	TR	_____
10/31/19	110148	Call with counsel as to the Professional Loading Services sale closing, follow-up on the order and closing terms (.3).	Zaro, David	0.30	236.25	25,109.55	WO	HD	TR	_____
11/04/19	101603	Emails with counsel/Receiver concerning the closing of the sale (.3). Review of PSA/closing documents, advice to Receiver as to closing (.4). Follow-u on closing of the	Zaro, David	1.30	1,023.75	26,133.30	WO	HD	TR	_____

11/19/21 11:48:09 PROFORMA STATEMENT FOR MATTER 376462.00006 (Seaman, Thomas A./Receiver for PDC Capit) (Sale/Disposition/Transfer of Assets)

Fees for Matter 376462.00006.(Sale/Disposition/Transfer of Assets)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		sale of assets and email to Reeiver (.6).						
08/16/21	8537980	Respond to inquiry from transferee of Cafe Primo liquor license	Fates, Edward (Ted)	0.20	128.70	26,262.00	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	23.70	787.50	18,663.75
001578	Hall, Debra	7.70	715.50	5,509.35
001665	Fates, Edward (Ted)	3.30	594.00	1,960.20
001665	Fates, Edward (Ted)	0.20	643.50	128.70
		<u>34.90</u>		\$26,262.00
Subtotal Fees				\$26,262.00
Discount				0.00
Total Fees				26,262.00
Total Disbursements				0.00

Attorney Billing Instructions

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> Transfer All

Billing Instructions

expires 12/31/2021: 10% OFF STANDARD RATES (AUTOMATIC); no text editing; copies @ .10; rate freeze until 1/31/18

Account Summary – As Of 11/19/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	128.70	128.70	0.00	128.70	128.70	0.00	534,574.26	534,574.26	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	975.96	975.96	0.00

11/19/21 11:48:09 PROFORMA STATEMENT FOR MATTER 376462.00006 (Seaman, Thomas A./Receiver for PDC Capit) (Sale/Disposition/Transfer of Assets)

Billed	0.00	0.00	0.00	0.00	0.00	0.00	0.00	507,336.30	507,336.30	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	0.00	507,336.30	507,336.30	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs							
WIP	26,262.00	26,262.00	0.00							
Balance										
AR Balance	0.00	0.00	0.00							
Unalloc	0.00									
Payment										
Client Trust	0.00									
Balance										

Billing Address

Seaman, Thomas A./Receiver for PDC Capital Group, LLC; Caffè Primo
 International
 SEAMAN, THOMAS (Receiver)
 1 Park Plaza, Suite 580
 Irvine, CA 92614

}
 11/19/21 11:48:11 PROFORMA STATEMENT FOR MATTER 376462.00008 (Seaman, Thomas A./Receiver for PDC Capit) (Claims/Distribution)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David Matter #: 376462.00008 Client Name: Seaman, Thomas A./Receiver for PDC Capit
 Date of Last Billing: 10/28/19 Matter Name: Claims/Distribution
 Proforma Number: 1123198
 Client/Matter Joint Group # 376462-1

Fees for Matter 376462.00008.(Claims/Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	WO	HD	TR	Action
08/01/19	109960	Conferences with Receiver and counsel to address the impact of Richardson appeal, claims/distribution process (.6). Work on further revisions to the plan and motion to approve interim distribution (.4). Emails/call with Receiver and SEC counsel re: meet/confer (.6).	Zaro, David	1.60	1,260.00	1,260.00	WO	HD	TR	_____
08/07/19	47236	Draft declaration of Mr. Seaman in support of distribution plan/motion for authority to make interim distribution and closing tasks (1.4).	Zaro, David	1.40	1,102.50	2,362.50	WO	HD	TR	_____
08/16/19	69449	Final revision to Receiver declaration, draft order in support of the motion/distribution (.4). Final revisions to the motion to distribute, (.3). Emails with Receiver, meet/confer with the SEC, timing of hearing (.2).	Zaro, David	0.90	708.75	3,071.25	WO	HD	TR	_____
08/19/19	73693	Emails related to distribution plan, Richardson claim (.4).	Zaro, David	0.40	315.00	3,386.25	WO	HD	TR	_____

11/19/21 11:48:11 PROFORMA STATEMENT FOR MATTER 376462.00008 (Seaman, Thomas A./Receiver for PDC Capit) (Claims/Distribution)

Fees for Matter 376462.00008.(Claims/Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/21/19	69590	Call with SEC counsel related to distribution plan motion, follow-up with Receiver/counsel (.2).	Zaro, David	0.20	157.50	3,543.75	WO	HD	TR	_____
08/22/19	69577	Analysis of Claybourne email and claims evaluation as to Claybourne's assertion as to ballistic testing equipment (.4). Follow-up on the approach to the Montana claimants claims as to equipment and wages (.3).	Zaro, David	0.70	551.25	4,095.00	WO	HD	TR	_____
08/23/19	70836	Call/follow-up review of Claybourne equipment claims/analysis of ownership issues (.4). Call with Receiver concerning Claybourne and auction (.).	Zaro, David	0.60	472.50	4,567.50	WO	HD	TR	_____
09/16/19	62799	Call with SEC counsel related to the distribution plan motion.	Zaro, David	0.20	157.50	4,725.00	WO	HD	TR	_____
09/17/19	35827	Call with the Receiver concerning the hearing related to the distribution plan (.2). Analysis of Richardson appeal, impact upon distribution (.2).	Zaro, David	0.40	315.00	5,040.00	WO	HD	TR	_____
09/19/19	60935	Calls with Receiver and counsel as to hearing re distribution motion.	Zaro, David	0.20	157.50	5,197.50	WO	HD	TR	_____
09/20/19	55396	Call with Receiver related to hearing on the distribution motion, review potential issues (.4). Prepare for/attend the hearing at USDC, follow-up on Court's ruling (.9). Follow-up on the hearing concerning the distribution motion, work with the Receiver as to order on the distribution motion, changes in amounts and Court's inquiries (.5).	Zaro, David	1.80	1,417.50	6,615.00	WO	HD	TR	_____

11/19/21 11:48:11 PROFORMA STATEMENT FOR MATTER 376462.00008 (Seaman, Thomas A./Receiver for PDC Capit) (Claims/Distribution)

Fees for Matter 376462.00008.(Claims/Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
09/24/19	30199	Review court orders and email to Receiver as to distribution, the reserve and plan/notice.	Zaro, David	0.30	236.25	6,851.25	WO	HD	TR	_____
09/25/19	30262	Analysis of issues/strategy concerning Richardson's claim the pending appeal/claims and coordination of distribution (.4). Call with Receiver related to distribution (.2).	Zaro, David	0.60	472.50	7,323.75	WO	HD	TR	_____
10/01/19	106706	Emails with Receiver concerning the distribution issues related to the overseas investors (.4).	Zaro, David	0.40	315.00	7,638.75	WO	HD	TR	_____
10/03/19	115533	Call with Receiver related to distribution plan (.2).	Zaro, David	0.20	157.50	7,796.25	WO	HD	TR	_____
01/03/20	136260	Call with SEC counsel and follow-up with Receiver related to issues/investor distribution.	Zaro, David	0.40	315.00	8,111.25	WO	HD	TR	_____
04/02/20	8055410	Email from claimant related to distribution, assess claim, email to/from Receiver (.4).	Zaro, David	0.40	315.00	8,426.25	WO	HD	TR	_____
04/03/20	8056017	Follow-up on email concerning distribution issues regarding investors in China (.4). Review attorney lien claim and communications with Receiver and counsel (.5).	Zaro, David	0.90	708.75	9,135.00	WO	HD	TR	_____
04/06/20	8059913	Brief research and analysis of issues regarding claim lien, conference with counsel and follow-up on the issues related to claims, lien claims and follow-up regarding same (.9).	Zaro, David	0.90	708.75	9,843.75	WO	HD	TR	_____

11/19/21 11:48:11 PROFORMA STATEMENT FOR MATTER 376462.00008 (Seaman, Thomas A./Receiver for PDC Capit) (Claims/Distribution)

Fees for Matter 376462.00008.(Claims/Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/06/20	8061139	Meet and confer with counsel regarding strategy to respond to attorney's lien on certain claims (0.3). Analyze and evaluate strategy for responding to request to send funds pursuant to an attorney's lien; particular attention to the requirements of an enforceable attorney's lien (1.4).	Kenney, Suzanne	1.70	512.55	10,356.30	WO	HD	TR	_____
04/07/20	8061142	Continue analyzing and evaluating strategy for responding to request to send funds pursuant to an attorney's lien, with particular attention to the requirements of an enforceable attorney's lien, when a third party may reject a request for payment, and the professional standard for enforceable legal fees (1.2). Draft memorandum regarding same (0.8).	Kenney, Suzanne	2.00	603.00	10,959.30	WO	HD	TR	_____
04/08/20	8060525	Email/evaluate memo concerning the Scandura attorney lien claims, follow-up email to Receiver regarding distribution/claim (.4).	Zaro, David	0.40	315.00	11,274.30	WO	HD	TR	_____
04/08/20	8061143	Review and revise memorandum regarding strategy for responding to request to send funds pursuant to an attorney's lien (0.6).	Kenney, Suzanne	0.60	180.90	11,455.20	WO	HD	TR	_____
04/30/20	8081618	Follow-up on the attorney's claim of lien upon an investor recovery, follow-up with email to counsel (.3).	Zaro, David	0.30	236.25	11,691.45	WO	HD	TR	_____
05/01/20	8085092	Several emails/evaluate issues on 4/30 related to Scandura allegations regarding attorney lien/clams (.7). Emails with counsel as to research related to liens, follow-up advice (.4).	Zaro, David	1.10	866.25	12,557.70	WO	HD	TR	_____

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Fees for Matter 376462.00008.(Claims/Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/01/20	8087625	Analyze and evaluate attorney liens in order to determine the claim of an attorney upon investor distributions; analyze relevant documents; analyze and evaluate the state law procedure for creation of the lien, filing notice of the lien, and the enforceability of the lien; particular attention to the potential liability of a third party and their attorney for distributing judgment funds after receiving notice of a claimed attorney lien; Analyze and evaluate potential avenues for challenging an attorney lien (2.0). Review and revise memorandum regarding attorney liens (0.5).	Kenney, Suzanne	2.50	753.75	13,311.45	WO	HD	TR	_____
05/04/20	8087626	Continue analyzing and evaluating attorney liens in order to determine the claim of an attorney upon investor distributions; analyze and evaluate the state law procedure for filing notice of the lien, with particular attention to the potential liability of a third party and their attorney for distributing judgment funds after receiving notice of a claimed attorney lien; analyze and evaluate federal court rules governing attorney fees and liens, with particular attention to the exercise of supplemental jurisdiction (1.7). Analyze relevant documents (0.1). Review and revise memorandum regarding attorney liens and draft correspondence (0.5).	Kenney, Suzanne	2.30	693.45	14,004.90	WO	HD	TR	_____
05/05/20	8087496	Email concerning research as to attorney liens to confer with counsel (.8). Calls with Receiver and counsel related to attorney claims for fees/research (.4). Emails/review	Zaro, David	2.60	2,047.50	16,052.40	WO	HD	TR	_____

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Fees for Matter 376462.00008.(Claims/Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
		documents, research, and emails responses, analysis of the attorney's claims to investor proceeds (1.4).								
05/05/20	8089762	Meet and confer with counsel regarding strategy for evaluating attorney lien in anticipation of claims procedure (0.3). Analyze and evaluate relevant documents (0.1). Begin drafting correspondence regarding attorney lien (0.1).	Kenney, Suzanne	0.50	150.75	16,203.15	WO	HD	TR	_____
05/06/20	8089763	Analyze and evaluate relevant documents (0.3). Continue drafting correspondence regarding attorney lien in preparation for distribution of claims (1.1).	Kenney, Suzanne	1.40	422.10	16,625.25	WO	HD	TR	_____
05/07/20	8089269	Several emails from claimants who allege to be counsel for and entitle to distributions of investor proceeds (.4). Research issues related to attorney lien rights and Receiver response (.4).	Zaro, David	0.80	630.00	17,255.25	WO	HD	TR	_____
05/08/20	8091921	Calls with Receiver and email with Ms. Juroe related to the claims of attorneys and investors (.3). Analysis of the legal underpinnings for the claims of attorneys and response of Receiver (.3).	Zaro, David	0.60	472.50	17,727.75	WO	HD	TR	_____
05/11/20	8092142	Further legal analysis of attorney claims for fees and draft letter to counsel disputing claim.	Zaro, David	0.80	630.00	18,357.75	WO	HD	TR	_____
05/11/20	8094091	Review and revise letter regarding claims process and attorney lien (0.3). Analyze and evaluate claim for attorney lien (0.2).	Kenney, Suzanne	0.50	150.75	18,508.50	WO	HD	TR	_____

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Fees for Matter 376462.00008.(Claims/Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/12/20	8092642	Legal analysis, work on draft letter/emails concerning the attorney liens and follow-up regarding same (.5). Emails with counsel and Receiver related to claims of attorneys and response (.3).	Zaro, David	0.80	630.00	19,138.50	WO	HD	TR	_____
05/13/20	8093926	Email response to Mr. Scandura email related to the claims for fees.	Zaro, David	0.40	315.00	19,453.50	WO	HD	TR	_____
05/18/20	8096575	Attention to correspondence regarding claim for attorney's fees.	Kenney, Suzanne	0.10	30.15	19,483.65	WO	HD	TR	_____
05/19/20	8102379	Confer with counsel regarding attorney lien (0.2).	Kenney, Suzanne	0.20	60.30	19,543.95	WO	HD	TR	_____
05/21/20	8101351	Several calls with the Receiver and Ms. Juroe related to payment and attorney claims/approach.	Zaro, David	0.40	315.00	19,858.95	WO	HD	TR	_____
05/25/20	8104641	Analysis of the issues and approach to the Scandura claims, draft email response (.6). Review of Mader claims, client documents/email and email to counsel claimant (.5). Emails to Receiver clients concerning the Mader/Scandura claims (.3).	Zaro, David	1.40	1,102.50	20,961.45	WO	HD	TR	_____
06/02/20	8115499	Follow-up on emails from counsel concerning claims to attorney fees.	Zaro, David	0.60	472.50	21,433.95	WO	HD	TR	_____
06/03/20	8115511	Follow-up on the PDC claim by Mr. Mader/Baldwin and assess response (.4).	Zaro, David	0.40	315.00	21,748.95	WO	HD	TR	_____
06/15/20	8122494	Emails/calls with claimant's counsel and Receiver related to investor distributions.	Zaro, David	0.40	315.00	22,063.95	WO	HD	TR	_____

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Fees for Matter 376462.00008.(Claims/Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
07/01/20	8141374	Follow-up on the distribution to investors and the claims of third parties (attorneys), review previous emails and call with Receiver office.	Zaro, David	0.40	322.20	22,386.15	WO	HD	TR	_____
07/02/20	8141408	Follow-up with Receiver concerning final distribution and outstanding sums/tax obligations.	Zaro, David	0.20	161.10	22,547.25	WO	HD	TR	_____
09/10/20	8202816	Emails/call with the Receiver concerning ongoing distribution issues (.4).	Zaro, David	0.40	322.20	22,869.45	WO	HD	TR	_____
09/15/20	8207236	Assess issues related to the outstanding distributions, wire issues, follow-up with Receiver concerning plan terms, final tax returns.	Zaro, David	0.40	322.20	23,191.65	WO	HD	TR	_____
09/17/20	8214750	Call with Receiver related to the distribution plan, remaining claimants.	Zaro, David	0.20	161.10	23,352.75	WO	HD	TR	_____
03/17/21	8383362	Conference with counsel for SEC, follow-up with Receiver related to the distribution status (.3). Evaluate distribution plan, order concerning distribution (.4).	Zaro, David	0.70	563.85	23,916.60	WO	HD	TR	_____
03/19/21	8388611	Evaluate the distribution plan, address approach to final distribution of proceeds to allowed claims (.4). Call with Receiver regarding distribution (.2).	Zaro, David	0.60	483.30	24,399.90	WO	HD	TR	_____
03/23/21	8391279	Work with Receiver on the distribution and address prospects to make distribution, cost and timing.	Zaro, David	0.40	322.20	24,722.10	WO	HD	TR	_____
03/25/21	8393181	Email/call with Mr. Johnson related to the sale tax claims/Cafe Primo (.4). Emails to	Zaro, David	0.60	483.30	25,205.40	WO	HD	TR	_____

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Fees for Matter 376462.00008.(Claims/Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		Receiver related to the sales tax issues (.2).						
07/01/21	8497187	Follow-up with Receiver as to the work on the issues related to the Receiver's final distribution/timing.	Zaro, David	0.30	251.10	25,456.50	WO	HD TR
07/14/21	8510512	Call with Receiver/counsel related to distribution (.3). Call with counsel related to taxes, safe deposit box, pleadings filed by Francisco (.3).	Zaro, David	0.60	502.20	25,958.70	WO	HD TR
11/09/21	8628467	Communications with SEC counsel re: timing of final distribution and conclusion of receivership	Fates, Edward (Ted)	0.30	193.05	26,151.75	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	23.50	787.50	18,506.25
000313	Zaro, David	3.90	805.50	3,141.45
000313	Zaro, David	0.90	837.00	753.30
001665	Fates, Edward (Ted)	0.30	643.50	193.05
002343	Kenney, Suzanne	11.80	301.50	3,557.70
		<u>40.40</u>		<u>\$26,151.75</u>
Subtotal Fees				\$26,151.75
Discount				0.00
Total Fees				26,151.75
Total Disbursements				0.00

Attorney Billing Instructions

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

11/19/21 11:48:11 PROFORMA STATEMENT FOR MATTER 376462.00008 (Seaman, Thomas A./Receiver for PDC Capit) (Claims/Distribution)

Billing Instructions

expires 12/31/2021: 10% OFF STANDARD RATES (AUTOMATIC); no text editing; copies @ .10; rate freeze until 1/31/18

Account Summary – As Of 11/19/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	946.35	946.35	0.00	2,799.00	2,799.00	0.00	237,356.55	237,356.55	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	1,183.59	1,183.59	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	210,021.21	210,021.21	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	210,021.21	210,021.21	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	26,151.75	26,151.75	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Seaman, Thomas A./Receiver for PDC Capital Group, LLC; Caffè Primo
 International
 SEAMAN, THOMAS (Receiver)
 1 Park Plaza, Suite 580
 Irvine, CA 92614

}

11/19/21 11:48:13 PROFORMA STATEMENT FOR MATTER 376462.00012 (Seaman, Thomas A./Receiver for PDC Capit) (Richardson Litigation)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David

Matter #: 376462.00012

Client Name: Seaman, Thomas A./Receiver for PDC Capit

Date of Last Billing: 12/31/19

Matter Name: Richardson Litigation

Proforma Number: 1123198

Client/Matter Joint Group # 376462-1

Fees for Matter 376462.00012.(Richardson Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	WO	HD	TR	Action
10/25/19	99108	Follow-up on the Richardson appeal and record, analysis of Receiver records on appeal (.4).	Zaro, David	0.40	315.00	315.00	WO	HD	TR	_____
10/29/19	101136	Work on the issues related to appeal filed by Richardson, assess the strategy (1.1).	Zaro, David	1.10	866.25	1,181.25	WO	HD	TR	_____
10/30/19	104849	Research/analysis of legal issues, standard of review, jurisdiction and review of prior briefing, follow-up with counsel re strategy.	Zaro, David	2.40	1,890.00	3,071.25	WO	HD	TR	_____
10/31/19	110152	Work on/conduct research related to appellate issues, the excerpts of record (1.2). Draft outline and preliminary section of the appellate brief (1.4).	Zaro, David	2.60	2,047.50	5,118.75	WO	HD	TR	_____
11/06/19	136489	Call with Receiver and counsel and work on the Richardson appeal (.3); Work on issues/research strategy and mootness argument/motion to dismiss (.4).	Zaro, David	0.70	551.25	5,670.00	WO	HD	TR	_____
11/07/19	135375	Work with counsel to address legal issues, research and record on appeal, follow-up on extension due date to file brief (4.).	Zaro, David	0.40	315.00	5,985.00	WO	HD	TR	_____

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Fees for Matter 376462.00012.(Richardson Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/07/19	136497	Meeting with D. Zaro re: 9th Circuit Appeal; meeting with J. del Castillo re: next steps; briefly begin reviewing Appellant's Opening Brief.	Villagomez, Stacey	0.70	258.30	6,243.30	WO	HD	TR	_____
12/03/19	91638	Work on the draft of the Receiver's/appellee's brief and research/evidence issues (2.6).	Zaro, David	2.60	2,047.50	8,290.80	WO	HD	TR	_____
12/05/19	110196	Calls with Receiver and counsel related to the appellee's brief (.4). Work on revisions to the draft of appellee brief/research issues (1.8).	Zaro, David	1.20	945.00	9,235.80	WO	HD	TR	_____
12/09/19	113181	Research/analysis of mootness claim, revise draft o the appellee's brief in opposition to appeal of Richardson (.7). Work with counsel concerning issues related to the mootness argument and excerpts of record (.4).	Zaro, David	1.10	866.25	10,102.05	WO	HD	TR	_____
12/10/19	110238	Review appellant's opening brief; revise and draft respondent's brief.	Villagomez, Stacey	1.50	553.50	10,655.55	WO	HD	TR	_____
12/11/19	105531	Research and prepare appellee's opening brief (2.9); meeting with J. del Castillo re: same (.3).	Villagomez, Stacey	3.20	1,180.80	11,836.35	WO	HD	TR	_____
12/12/19	34965	Work on the excerpts of record issues, review record and advice to counsel (.6).	Zaro, David	0.60	472.50	12,308.85	WO	HD	TR	_____
12/12/19	136345	Meeting with J. del Castillo re: res judicata and waiver issues; meeting with D. Zaro re: status of brief; continue preparing first draft of brief.	Villagomez, Stacey	4.70	1,734.30	14,043.15	WO	HD	TR	_____

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Fees for Matter 376462.00012.(Richardson Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
12/13/19	24723	Continue drafting appellee's opening brief (3.0); draft and send correspondence to Word Processing re: formatting and review edits (.3); draft and send correspondence to J. del Castillo attaching first draft of brief (.2); meeting with J. del Castillo to discuss edits to same (.5).	Villagomez, Stacey	4.00	1,476.00	15,519.15	WO	HD	TR	_____
12/13/19	87965	Work on/revise draft brief and address possible mootness, futility arguments.	Zaro, David	0.90	708.75	16,227.90	WO	HD	TR	_____
12/15/19	129280	Continue drafting Appellee's Answering Brief; compile excerpts of record; draft request for judicial notice; compile all request for judicial notice exhibits.	Villagomez, Stacey	4.90	1,808.10	18,036.00	WO	HD	TR	_____
12/16/19	129366	Final proofread of appellee's answering brief and motion for judicial notice; final review of excerpts of record; meeting with M. Diaz re: preparing excerpts of record.	Villagomez, Stacey	1.40	516.60	18,552.60	WO	HD	TR	_____
12/17/19	93687	Work on final revisions to appellee's brief pending in 9th Circuit Court of Appeals, advice to counsel (.8). Several calls re excerpts of record, review exhibits (.9).	Zaro, David	1.70	1,338.75	19,891.35	WO	HD	TR	_____
12/17/19	120501	Finalize excerpts of record on appeal and final proofread of appellee's opening brief; coordinate filing of same with M. Diaz.	Villagomez, Stacey	4.30	1,586.70	21,478.05	WO	HD	TR	_____
01/03/20	136261	Review emails/filings and call with counsel related to the appendix/appellate filing to the 9th Circuit re Richardson appeal (.3).	Zaro, David	0.30	236.25	21,714.30	WO	HD	TR	_____

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Fees for Matter 376462.00012.(Richardson Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/07/20	117965	Review/evaluate the Richardson's appeal reply brief (.5). Call with Receiver/counsel concerning the reply and oral argument (.2).	Zaro, David	0.70	551.25	22,265.55	WO	HD	TR	_____
02/06/20	7998640	Several emails/calls concerning the Richardson appeal, follow-up with Receiver re same (.3).	Zaro, David	0.30	236.25	22,501.80	WO	HD	TR	_____
02/19/20	8008854	Meeting with counsel and call with Receiver related to oral argument.	Zaro, David	0.20	157.50	22,659.30	WO	HD	TR	_____
03/11/20	8034419	Review order from court of appeal, follow-up on Receiver response, Richardson response (.3).	Zaro, David	0.30	236.25	22,895.55	WO	HD	TR	_____
04/27/20	8077157	Email from 9th Circuit as to oral argument, assess the next steps (.3). Follow-up and review of briefing to assess oral argument issues (.9).	Zaro, David	1.20	945.00	23,840.55	WO	HD	TR	_____
05/13/20	8093927	Emails/address Court of Appeals notices and file acknowledgement of hearing notice regarding Richardson oral argument hearing.	Zaro, David	0.40	315.00	24,155.55	WO	HD	TR	_____
06/17/20	8136022	Draft and send correspondence to D. Zaro and M. Diaz re: upcoming hearing (.4).	Villagomez, Stacey	0.40	147.60	24,303.15	WO	HD	TR	_____
06/23/20	8129289	Follow-up on the court notice as to the oral argument, email to the Court of Appeal for the Ninth Circuit (.4).	Zaro, David	0.40	315.00	24,618.15	WO	HD	TR	_____
06/26/20	8131552	Phone call with D. Zaro re: oral argument.	Villagomez, Stacey	0.30	110.70	24,728.85	WO	HD	TR	_____

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Fees for Matter 376462.00012.(Richardson Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
06/26/20	8131663	Follow-up on the Richardson appeal with counsel and address research issues and preparation.	Zaro, David	0.40	315.00	25,043.85	WO	HD	TR	_____
07/02/20	8141422	Work/follow-up with 9th Circuit rules concerning the oral argument and follow-up to commence preparation for the oral argument.	Zaro, David	1.10	886.05	25,929.90	WO	HD	TR	_____
07/09/20	8144531	Emails to Receiver and counsel related to the Richardson appeal, the status of hearing, disposition (.5). Call with counsel related to Richardson appeal (.1).	Zaro, David	0.60	483.30	26,413.20	WO	HD	TR	_____
11/23/20	8278036	Evaluate 9th Circuit docket, call-email with Receiver as to Richardson appeal.	Zaro, David	0.20	161.10	26,574.30	WO	HD	TR	_____
12/09/20	8289831	Follow-up on the appeal and status of the matter, assess 9th Circuit docket (.4).	Zaro, David	0.40	322.20	26,896.50	WO	HD	TR	_____
02/01/21	8340031	Emails, review/evaluate Richardson appellate decision, assess order and procedural issues (.7). Email to Receiver and SEC counsel regarding same (.4).	Zaro, David	1.10	886.05	27,782.55	WO	HD	TR	_____
02/23/21	8358716	Emails/follow-up with Receiver regarding mandate from court of appeal as to Richardson.	Zaro, David	0.30	241.65	28,024.20	WO	HD	TR	_____

Disbursements for Matter 376462.00012 (Richardson Litigation)

Trans Date	Index	Type	Quantity	Amt	Circle	Action		
04/10/19	156575	DCSRCH – Document Search - - WellsOne, 4/01/2019-6/30/2019^4406104-Q22019^4406104Q22019	1.00	8.40	WO	HD	TR	_____

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Disbursements for Matter 376462.00012 (Richardson Litigation)

Trans Date	Index	Type	Quantity	Amt				
12/26/19	127865	DUP – Duplication	4,152.00	415.20	WO	HD	TR	_____
12/26/19	195803	MSNGR – Messenger - - Nationwide Legal, LLC, ^203214	1.00	16.20	WO	HD	TR	_____
12/26/19	195866	MSNGR – Messenger - - Nationwide Legal, LLC, DELIVER COURTESY COPEs^203214	1.00	131.50	WO	HD	TR	_____
02/10/20	105775	DCSRCH – Document Search - - WellsOne, PACER ^10/01/2019-12/31/2019 AP CARD^4406104Q42019	1.00	18.60	WO	HD	TR	_____
02/10/20	105776	DCSRCH – Document Search - - WellsOne, PACER ^10/01/2019-12/31/2019 AP CARD^4406104Q42019	1.00	6.00	WO	HD	TR	_____
04/06/20	2649736	DCSRCH – Pacer 0120 - 03/20 Usage	0.00	0.40	WO	HD	TR	_____
06/17/20	2651987	BW – Duplication - Black & White Copies	87.00	8.70	WO	HD	TR	_____
07/07/20	2662590	DCSRCH – Document Search - - PACER - 04/20 -6/20 Usage	0.00	0.30	WO	HD	TR	_____
05/10/21	2719159	DCSRCH – Document Search - - PACER - 1/21 -3/21 Usage	0.00	0.20	WO	HD	TR	_____

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	19.90	787.50	15,671.25
000313	Zaro, David	3.70	805.50	2,980.35
002336	Villagomez, Stacey	25.40	369.00	9,372.60
		<u>49.00</u>		<u>\$28,024.20</u>
	Subtotal Fees			\$28,024.20
	Discount			0.00
	Total Fees			28,024.20
	Total Disbursements			605.50

Attorney Billing Instructions

() BILL ALL () Hold

11/19/21 11:48:13 PROFORMA STATEMENT FOR MATTER 376462.00012 (Seaman, Thomas A./Receiver for PDC Capit) (Richardson Litigation)

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

Billing Instructions

expires 12/31/2021: 10% OFF STANDARD RATES (AUTOMATIC); no text editing; copies @ .10; rate freeze until 1/31/18

Account Summary – As Of 11/19/21

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	1,127.90	1,127.70	0.20	146,160.52	145,555.02	605.50
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	480.15	480.15	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	117,050.67	117,050.67	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	117,050.67	117,050.67	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP Balance	28,638.60	28,024.20	614.40						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

Seaman, Thomas A./Receiver for PDC Capital Group, LLC; Caffè Primo
 International
 SEAMAN, THOMAS (Receiver)
 1 Park Plaza, Suite 580
 Irvine, CA 92614