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13 Attorneys for Receiver
14 WILLIAM J. HOFFMAN

15 **UNITED STATES DISTRICT COURT**
16 **CENTRAL DISTRICT OF CALIFORNIA**
17 **WESTERN DIVISION**

18 SECURITIES AND EXCHANGE
19 COMMISSION,

20 Plaintiff,

21 v.

22 NATIONWIDE AUTOMATED
23 SYSTEMS, INC.; JOEL GILLIS; and
24 EDWARD WISHNER,

25 Defendants,

26 OASIS STUDIO RENTALS, LLC;
27 OASIS STUDIO RENTALS #2, LLC;
28 and OASIS STUDIO RENTALS #3,

Relief Defendants.

Case No. CV-14-07249-SJO (FFMx)

**THIRD INTERIM FEE
APPLICATION OF ALLEN
MATKINS LECK GAMBLE
MALLORY & NATSIS LLP,
GENERAL COUNSEL TO THE
RECEIVER, FOR PAYMENT OF
FEES AND REIMBURSEMENT OF
EXPENSES**

Date: September 21, 2015
Time: 10:00 a.m.
Ctrm: 1 - 2nd Floor
Judge: Hon. S. James Otero

1 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), general
2 counsel to William Hoffman ("Receiver"), the Court-appointed permanent receiver
3 for Defendant Nationwide Automated Systems, Inc. ("NASI"), Relief Defendants
4 Oasis Studio Rentals, LLC, Oasis Studio Rentals #2, LLC, and Oasis Studio
5 Rentals #3, LLC ("Relief Defendants"), and their subsidiaries and affiliates, hereby
6 submits this third interim application for approval and payment of fees and
7 reimbursement of expenses ("Application"). This Application covers the period from
8 April 1, 2015 through June 30, 2015 ("Third Application Period"), and seeks interim
9 approval of \$51,826.50 in fees and \$2,951.36 in expenses, and an order authorizing
10 the Receiver to pay, on an interim basis, 80% of fees incurred (\$41,461.20) and
11 100% of expenses incurred. As it has since the beginning of the receivership, Allen
12 Matkins has discounted its customary hourly rates by 10%.

13 I. INTRODUCTION

14 This equity receivership involves a large and complex Ponzi scheme that is the
15 subject of the Complaint filed by the Securities and Exchange Commission
16 ("Commission"). The Receiver was appointed on a temporary basis on
17 September 30, 2014, and on a permanent basis on October 29, 2014.

18 The appointment orders confer broad duties, responsibilities, and powers on
19 the Receiver which are designed to allow him to secure, preserve, and protect the
20 assets of the Receivership Entities, investigate and recover sums transferred to third
21 parties, conduct a forensic accounting and analysis of the Receivership Entities'
22 financial transactions, review and analyze investor claims, and maximize the amount
23 ultimately available for distribution to investors. The appointment orders also
24 authorize the Receiver to engage counsel to assist him in the performance of his
25 duties. The Receiver promptly determined that experienced, qualified counsel was
26 critical due to the size and complexity of the receivership estate. Accordingly, the
27 Receiver engaged Allen Matkins to assist with urgent legal issues facing the
28 receivership estate and the firm immediately began work, including assisting with the

1 takeover of the companies and securing their assets. The Court approved the
 2 Receiver's proposal to file reports and fee applications on a quarterly basis. Dkt.
 3 No. 47. The Court also approved Allen Matkins' First and Second Interim Fee
 4 Application, authorizing payment of 80% of fees incurred and 100% of costs
 5 incurred. Dkt. Nos. 72, 79.

6 This fee application should be read in conjunction with the Receiver's Fourth
 7 Interim Report ("Fourth Report"), which describes in detail the Receiver's activities
 8 during the Third Application Period. So as to avoid repetition, references are made
 9 to relevant portions of the Fourth Report in the below descriptions of Allen Matkins'
 10 work.

11 This Application seeks interim approval of \$51,826.50 in fees for a total of
 12 128.30 hours worked and payment on an interim basis of 80% of that amount, or
 13 \$41,461.20. The work performed is described task-by-task on Exhibit A and is
 14 broken down into the following categories:

Category	Hours	Amount
General Receivership	3.5	1,622.25
Asset Investigation	85.3	32,251.05
Reporting	8.5	3,939.75
Claims & Distributions	3.7	1,687.05
Third Party Recoveries	22.3	10,008.90
Pending Litigation	0.7	324.45
Employment/Fees	4.3	1,993.05
Totals	128.30	\$51,826.50

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25 The initial phase of a complex equity receivership always involves substantial
 26 work by the receiver and professionals to (a) identify and secure cash, real property,
 27 and other assets, (b) preserve their value, (c) investigate and pursue recovery of funds
 28 disbursed from the Receivership Entities' accounts, (d) address operational and

1 employee issues, (e) gather and review key documents, and (f) advise the Court on
2 the status of the Receiver's activities. As this type of receivership progresses, fees
3 and costs generally decline as operations are stabilized, assets are secured and
4 protected, and procedures for the efficient administration of the receivership are put
5 in place. This general trend of declining fees after the initial phase of the
6 receivership is evident here. The fees incurred during the Third Application Period
7 have declined substantially from those in Allen Matkins' First and Second Interim
8 Fee Applications (\$113,047.65 and \$67,638.75, respectively).

9 Allen Matkins has worked diligently and efficiently to assist the Receiver with
10 urgent legal issues facing the receivership estate. The firm has assisted the Receiver
11 in carrying out his Court-ordered duties and should be compensated on an interim
12 basis for its work.

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

14 **A. General Receivership**

15 Allen Matkins' work in the General Receivership category involved
16 communications with counsel for Defendant Joel Gillis and the Assistant United
17 States Attorneys working on the related criminal case. Allen Matkins advised the
18 Receiver regarding the production of information to Gillis' counsel in response to
19 their request. The reasonable and necessary fees for Allen Matkins' work in this
20 category total \$1,622.25.

21 **B. Asset Investigation**

22 Allen Matkins' time in this category focused on assisting in the Receiver's
23 investigation and recovery of receivership assets. In particular, during the Third
24 Application Period, Allen Matkins issued 33 subpoenas to various financial
25 institutions, witnesses (entities and individuals), and other third parties to obtain
26 documents necessary to the Receiver's investigation and accounting. Allen Matkins
27 followed up and handled direct communications with the recipients of subpoenas as
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1 necessary and appropriate to ensure their compliance. The firm also maintains a
2 tracking log of subpoenas issued and records received.

3 During the Third Application Period, the Receiver's investigation and
4 document gathering efforts focused largely on the Oasis entities. Very little
5 information about the Oasis entities' assets or operations was provided by Defendants
6 or Relief Defendants. For the most part, the Receiver and Allen Matkins had to
7 gather records from scratch, review and analyze bank statements and other
8 documents, and interview witnesses to ascertain the assets and operations of the
9 Oasis entities, as well as investments, loans, and other transfers made from Oasis
10 accounts. Attorney Ted Fates also participated in a meeting with Defendant Edward
11 Wishner and his counsel on April 3, 2014. Due to the large number of entities,
12 individuals, and vehicles associated with Oasis, and the lack of record-keeping by the
13 companies, the investigation and document gathering work was very time-
14 consuming.

15 During the investigation, the Receiver learned that prior to the receivership,
16 Oasis had transferred funds to Lisa Freede Design, LLC ("LFD"), a settlement had
17 been reached between LFD and Wishner, and LFD had been making payments to
18 Wishner pursuant to the settlement. Allen Matkins assisted the Receiver in
19 contacting Wishner's counsel and securing Wishner's agreement to (a) turn over the
20 settlement payments to the Receiver and (b) instruct LFD to make all future
21 settlement payments directly to the Receiver. A total of \$12,000 was recovered, with
22 payments of \$1,500 due from LFD each month.

23 The Receiver's investigation also revealed that NASI and Oasis transferred
24 \$160,000 to KER, LLC, an entity associated with Robert Keller's sister, Karin
25 McCoy. Allen Matkins assisted the Receiver in communications with KER's counsel
26 and in securing recovery of the full \$160,000.

27 During the deposition of Robert Keller taken in March 2015, it was learned
28 that Robert Keller had taken vehicles previously being managed by Oasis and

1 continued managing them under the name Fiji Rentals. Allen Matkins assisted the
2 Receiver in communications with Robert Keller and Fiji Rentals regarding this issue.
3 Although Keller and Fiji Rentals initially agreed to turn over the rental income from
4 the vehicles, they have failed to do so and the Receiver now intends to seek relief
5 from the Court.

6 Finally, Allen Matkins assisted in communications with Fuel Doctor, LLC and
7 Mark Soffa and in securing the production of documents necessary of the Receiver's
8 investigation of Fuel Doctor. The reasonable and necessary fees for work in this
9 category during the Second Application Period total \$32,251.05.

10 **C. Reporting**

11 Allen Matkins' work in this category during the Third Application Period
12 focused on preparing the Receiver's Third Interim Report and Recommendations
13 ("Third Report"). Dkt. No. 73. The Third Report, filed on May 27, 2015, provided a
14 detailed summary of the Receiver's activities during the first quarter of 2015,
15 including receipts and disbursements for the receivership estate during that period.
16 Allen Matkins also assisted in discussing the Third Report with counsel for the
17 Securities and Exchange Commission ("Commission") and in responding to the
18 Commission's questions. The reasonable and necessary fees for work in this
19 category total \$3,939.75.

20 **D. Claims and Distributions**

21 During the Third Application Period, Allen Matkins responded to direct
22 inquiries from investors and creditors and their counsel regarding the Receiver's
23 appointment, the effect of the receivership, claims against the receivership estate,
24 1099 tax statements, and related issues. This category also includes time advising
25 the Receiver on the content and features of the receivership website. The reasonable
26 and necessary fees for work in this category total \$1,687.05.

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1 **E. Third Party Recoveries**

2 Allen Matkins' work in this category focused mainly on the pursuit of
3 Clawback Claims pursuant to the order authorizing the Receiver to pursue such
4 claims and approving procedures related thereto. Dkt. No. 72. The firm advised the
5 Receiver regarding legal issues relating to Clawback Claims, the scope of
6 recoverable transfers, and the statute of limitations and repose for such claims. Allen
7 Matkins also advised on legal issues unique to certain claims (including probate
8 issues), recovery strategy, and forensic accounting needed to support Clawback
9 Claims. Allen Matkins advised on demand letters and communicated directly with
10 counsel for various investors who received profits ("Net Winners"), including
11 finalizing settlements with certain Net Winners pursuant to the Court-approved
12 procedures.¹ The success of the Receiver and Allen Matkins' work on Clawback
13 Claims is already evident as the Receiver has recovered more than \$1.1 million in
14 Clawback settlements to date.

15 Allen Matkins also assisted the Receiver in investigating claims against other
16 third parties who may have assisted in NASI's fraudulent activities. The Receiver's
17 investigation and evaluation of such claims is ongoing. The reasonable and
18 necessary fees for work in this category total \$10,008.90.

19 **F. Pending Litigation**

20 Allen Matkins assisted the Receiver in reviewing and addressing a lawsuit
21 brought by Lisa Gauff against an Oasis-related entity, among other defendants. The
22 reasonable and necessary fees for work in this category total \$324.45.

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25 ¹ It should be noted that Allen Matkins' work on Clawback Claims does not
26 duplicate or overlap with work performed by the Receiver and his staff. Allen
27 Matkins' role is to prepare legal documents, advise on legal issues and strategy,
28 handle litigation in the event Net Winners do not accept the Court-approved
settlement offer. The Receiver and his staff perform necessary accounting and
analysis, prepare and track demand letters, handle direct communications with
Net Winners, and finalize settlements with Net Winners who do not have counsel.

1 **G. Employment/Fees**

2 Although fee applications are a necessary component of federal equity
3 receiverships, neither the Receiver nor his professionals charge for time spent
4 preparing their own detailed applications. Allen Matkins assisted the Receiver in
5 preparing his Second Interim Fee Application as well as in discussing the fee
6 applications with counsel for the Commission. The reasonable and necessary fees
7 for work in this category total \$1,993.05.

8 **H. Summary of Expenses**

9 Allen Matkins requests the Court approve reimbursement of \$2,951.36 in out-
10 of-pocket costs. The itemization of such expenses is summarized below by category.
11 The majority of expenses incurred relate to the service of the 33 subpoenas issued by
12 Allen Matkins to assist the Receiver in obtaining necessary records.

13 The total for costs incurred by Allen Matkins during the Application Period is
14 \$2,951.36 and is broken down by category as follows:

15 Category	Total
16 Legal Research / PACER fees	199.50
17 Service / Messenger fees	1,634.04
18 Duplication/Faxes/Postage	64.07
19 Conference Calls	19.25
20 Discovery Costs	1,034.50
21 TOTAL	\$2,951.36

22

23 **III. THE FEES AND COSTS ARE REASONABLE**

24 **AND SHOULD BE ALLOWED**

25 "As a general rule, the expenses and fees of a receivership are a charge upon
26 the property administered." *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994).
27 These expenses include the fees and expenses of the Receiver and his professionals,
28 including Allen Matkins. Decisions regarding the timing and amount of an award of

1 fees and costs to the Receiver and his Professionals are committed to the sound
2 discretion of the Court. *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992).

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

18 As a preliminary matter, the TRO and Preliminary Injunction Order confer on
19 the Receiver substantial duties and powers, including to conduct such investigation
20 and discovery as is necessary to locate and account for all receivership assets, take
21 such action as is necessary and appropriate to assume control over and preserve
22 receivership assets, and employ attorneys and others to investigate and, where
23 appropriate, institute, pursue, and prosecute all claims and causes of action of
24 whatever kind and nature. *See* Dkt. No. 17 (TRO, Part XIII); Dkt. No. 42
25 (Preliminary Injunction Order, Part XII). The Receiver promptly determined that
26 experienced, qualified counsel was necessary due to the size and complexity of the
27 receivership estate. The Court approved the Receiver's proposal to file interim
28 reports and fee applications on a quarterly basis. Dkt. No. 47.

1 Allen Matkins has submitted a detailed fee application which describes the
2 nature of the services rendered and the identity and billing rate of each individual
3 performing each task. *See* Exhibit A. Allen Matkins has endeavored to staff matters
4 as efficiently as possible while remaining cognizant of the complexity of issues
5 presented. The request for fees is based on Allen Matkins' customary billing rates
6 charged for comparable services provided in other matters, less a 10% discount. In
7 addition, Allen Matkins did not charge for 3.4 hours (\$1,575.90) of work during the
8 Third Application Period.

9 The work performed by Allen Matkins was essential to carrying out the
10 Receiver's Court-ordered duties. The Receiver and Allen Matkins have worked
11 diligently since the Receiver's appointment to (a) investigate, secure, and protect the
12 assets of the receivership estate, (b) preserve and maintain the limited revenue stream
13 from the ATM business, (c) investigate transfers to third parties and potential claims
14 related thereto, (d) inform the Court and the parties of the Receiver activities,
15 (e) make recommendations for the efficient and effective administration of the
16 receivership, and (f) efficiently disseminate information to investors and respond to
17 frequently asked questions. It should be noted that Allen Matkins' work does not
18 duplicate or overlap with work performed by David Wallace, the General Counsel of
19 the Receiver's company, Trigild, Inc. Mr. Wallace has handled legal issues relating
20 to NASI's operations, including the ATM business, the servicers, other vendors, and
21 insurance issues.

22 Allen Matkins seeks payment of only 80% of fees incurred on an interim basis
23 in recognition of the fact that its work in assisting the Receiver is ongoing. Payment
24 of the proposed 20% holdback will be sought at the conclusion of the receivership.
25 Allen Matkins' fees are fair and reasonable and should be approved and paid on an
26 interim basis.

27 IV. CONCLUSION

28 Allen Matkins therefore respectfully requests this Court enter an Order:

- 1 1. Approving Allen Matkins' fees, on an interim basis, of \$51,826.50;
- 2 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
- 3 \$41,461.20, from the assets of the Receivership Entities;
- 4 3. Approving Allen Matkins' costs in the amount of \$2,951.36, and
- 5 authorizing and directing the Receiver to reimburse such costs in full; and
- 6 4. For such other and further relief as the Court deems appropriate.

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8 Dated: August 18, 2015

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

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10 By: _____ /s/ Ted Fates

TED FATES
Attorneys for Receiver
WILLIAM J. HOFFMAN

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EXHIBIT A

07/16/15 14:34:30 PROFORMA STATEMENT FOR MATTER 374464-00002 (General Receivership) 374464-00002

Preliminary Billing Form

Billing Atty: 001665 - Fates

Matter #: 374464-00002

Matter Name: General Receivership

Date of Last Billing: 06-22-2015

Client Name: William J. Hoffman, Receiver for NASI

Proforma Number 1220769

Client/Matter Joint Group # 374464-1

Fees for Matter 374464-00002 (General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
04/21/15	6515806	Review request from Gillis's counsel for investor contact information, analyze legal issues regarding same, communications with Gillis's counsel, confer with SEC's counsel and AUSA regarding same; and advise A. Kudla regarding status.	Fates, Edward G.	0.8	370.80	370.80
04/22/15	6516578	Confer with Gillis's counsel regarding request for information and continuance of criminal sentencing and advise Receiver regarding same.	Fates, Edward G.	1.2	556.20	927.00
04/23/15	6518107	Discuss issues regarding Gillis's request for information with A. Kudla (.2); call with AUSA regarding same and sentencing issues (.3).	Fates, Edward G.	0.5	231.75	1,158.75
04/24/15	6519093	Communications with AUSA Katzenstein (.2); discuss Gillis's request for information with A. Kudla and communications with Gillis's counsel regarding same (.3).	Fates, Edward G.	0.5	231.75	1,390.50
04/28/15	6522306	Discuss production of investor list to Gillis's counsel with A. Kudla.	Fates, Edward G.	0.1	46.35	1,436.85
05/01/15	6528463	Discuss NASI investor list with A. Kudla and communications with	Fates, Edward G.	0.4	185.40	1,622.25

07/16/15 14:34:30 PROFORMA STATEMENT FOR MATTER 374464-00002 (General Receivership) 374464-00002

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		Gillis's counsel regarding same.				

Disbursements for Matter 374464-00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt
04/01/15	2124670	Production of Documents - - Mark S. Varshwsky & Associates - Fee for production of records per subpoena re Hollywood Wagons LLC	1.00	50.00
04/13/15	2126835	Duplication	2.00	0.38
04/15/15	2136844	Audio Conferencing - Aspen Conferencing - Fates Edward ^ 10773 - Call to: 2147899424 6192 331155 6192331155 8582421222 8582421222	1.00	19.25
04/29/15	2131731	Document Search - - Pacer Service 01/01/2015-03/31/2015^2505376-Q120	1.00	2.70
05/20/15	2138771	Messenger - - Federal Express - Invoice No: 504823405 Ship To: Aaron Kudla, Esq	1.00	10.74
05/21/15	2134566	Duplication	9.00	1.71
05/21/15	2138804	Messenger - - Federal Express - Invoice No: 504843216 Ship To: Ramon Santoyo Sr	1.00	10.74
05/22/15	2138805	Messenger - - Federal Express - Invoice No: 504843216 Ship To: c o Ramon Santoyo Jr	1.00	13.82
05/22/15	2144308	Service of Process - - Nationwide Legal, LLC Touchstone Television Productions^135146	1.00	105.00
05/23/15	2138777	Messenger - - Federal Express - Invoice No: 504843216 Ship To: MARCELLA LYONS	1.00	10.91
05/27/15	2139495	Messenger - - Federal Express Invoice No: 505525016 Ship To: Hon James S Otero	1.00	10.74
05/29/15	2135366	Transcript - - Veritext, LLC - Re: Robert Alan Keller's deposition	1.00	984.50

07/16/15 14:34:30 PROFORMA STATEMENT FOR MATTER 374464-00002 (General Receivership) 374464-00002

Trans Date	Index	Type	Quantity	Amt
06/05/15	2145763	Service of Process -- Nationwide Legal, LLC Paul McCormick^424200	1.00	154.00
06/05/15	2145767	Service of Process -- Nationwide Legal, LLC Cor Bgallo Social LLC^424200	1.00	38.00
06/05/15	2145768	Service of Process -- Nationwide Legal, LLC Brian Gallo^424200	1.00	35.00
06/05/15	2145769	Service of Process -- Nationwide Legal, LLC COR SH Equity Holdings LLC^424200	1.00	61.00
06/05/15	2145770	Service of Process -- Nationwide Legal, LLC Steve Doherty^424200	1.00	25.00
06/05/15	2145771	Service of Process -- Nationwide Legal, LLC Southwestern Imports Tiffany Inc^424200	1.00	141.00
06/05/15	2145772	Service of Process -- Nationwide Legal, LLC Dana Point Horror LLC^424200	1.00	95.00
06/05/15	2145773	Service of Process -- Nationwide Legal, LLC Cor Van Owen Group Limited^424200	1.00	90.00
06/05/15	2145774	Service of Process -- Nationwide Legal, LLC Cor Padre Group^424200	1.00	35.00
06/05/15	2145775	Service of Process -- Nationwide Legal, LLC J. Richard Leyner^424200	1.00	35.00
06/05/15	2145776	Service of Process -- Nationwide Legal, LLC Cor Tamp Media Consulting Inc^424200	1.00	45.00
06/05/15	2145777	Service of Process -- Nationwide Legal, LLC Cor Sepna LLC^424200	1.00	45.00
06/05/15	2145778	Service of Process -- Nationwide Legal, LLC Ali Reza Nader^424200	1.00	45.00
06/05/15	2145779	Service of Process -- Nationwide Legal, LLC Rachel Howitt^424200	1.00	45.00

07/16/15 14:34:30 PROFORMA STATEMENT FOR MATTER 374464-00002 (General Receivership) 374464-00002

Trans Date	Index	Type	Quantity	Amt
06/05/15	2145780	Service of Process - - Nationwide Legal, LLC NAI Capital Management Services^424200	1.00	45.00
06/05/15	2145781	Service of Process - - Nationwide Legal, LLC Michael Zugsmith^424200	1.00	45.00
06/05/15	2145782	Service of Process - - Nationwide Legal, LLC Cor Nai Capital Inc^424200	1.00	45.00
06/05/15	2145783	Service of Process - - Nationwide Legal, LLC Catherine Nguyen^424200	1.00	38.00
06/05/15	2145784	Service of Process - - Nationwide Legal, LLC Cor L.E.D.Productions LLC^424200	1.00	35.00
06/05/15	2145785	Service of Process - - Nationwide Legal, LLC Cor Devonshire Capital Group LLC^424200	1.00	76.00
06/05/15	2145786	Service of Process - - Nationwide Legal, LLC K. Joseph Shabani Esq^424200	1.00	35.00
06/05/15	2145787	Service of Process - - Nationwide Legal, LLC Cor Insurance West Corporation^424200	1.00	55.00
06/08/15	2140809	Duplication	133.00	25.27
06/08/15	2141289	Messenger - - Federal Express Invoice No: 506257909 Ship To: Hon S James Otero	1.00	11.26
06/08/15	2141290	Messenger - - Federal Express Invoice No: 506257909 Ship To: Aaron J Kudla, Esq	1.00	10.78
06/09/15	2140810	Duplication	109.00	20.71
06/15/15	2145764	Service of Process - - Nationwide Legal, LLC Cor for Hanna Ridge Vineyards LLC^424200	1.00	76.00
06/15/15	2145765	Service of Process - - Nationwide Legal, LLC Cor for U.S. Bank, Torrance Office^424200	1.00	50.00
06/15/15	2145766	Service of Process - - Nationwide Legal, LLC Hanna Soffa^424200	1.00	35.00

07/16/15 14:34:30 PROFORMA STATEMENT FOR MATTER 374464-00002 (General Receivership) 374464-00002

Trans Date	Index	Type	Quantity	Amt
06/19/15	2142680	Telecopier	8.00	16.00
06/19/15	2146721	Messenger - - Federal Express Invoice No: 507744705 Paid to: 1665 Ship To: Darren Wishner Ship Dt: 06/19/15 Airbill: 780849716832	1.00	15.27
06/22/15	2144988	Lexis Lexis - Research	1.00	196.80
06/24/15	2147093	Messenger - - Federal Express Invoice No: 508441925 Ship To: Aaron Kudla Ship Dt: 06/24/15 Airbill: 780875603609	1.00	10.78

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward G. Fates	3.5	463.50	1,622.25
		<u>3.5</u>		<u>1,622.25</u>
Total Fees				1,622.25
Total Disbursements				2,951.36

07/16/15 14:34:30 PROFORMA STATEMENT FOR MATTER 374464-00003 (Asset Investigation) 374464-00003

Preliminary Billing Form

Billing Atty: 001665 - Fates

Matter #: 374464-00003

Matter Name: Asset Investigation

Date of Last Billing: 06-22-2015

Client Name: William J. Hoffman, Receiver for NASI

Proforma Number 1220779

Client/Matter Joint Group # 374464-1

Fees for Matter 374464-00003 (Asset Investigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
04/01/15	6498425	Calls with R. Keller and D. Perillo regarding Fiji document production, accounting and potential settlement of issues and discuss same with A. Kudla (1.1); call with Georgia Production Services counsel regarding subpoena and document production and emails regarding same (.6); call with counsel for L. Freede regarding subpoena, document production, and settlement payments (.4); communications with Wishner's counsel regarding L. Freede issues (.2); work on new subpoenas to Oasis-related entities (.2); communications with A. Kudla regarding Oasis documents produced by Wishner (.1); communications with A. Kudla regarding call with US Attorney accountant (.1); call with counsel for KER, LLC regarding Oasis loan and document production and advise A. Kudla regarding same (.8); call with counsel for Laurelwood Place and Natwest Management regarding subpoena and extension of time to respond (.3); discuss	Fates, Edward G.	4.3	1,993.05	1,993.05

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		preparation and plan for Wishner meeting with A. Kudla (.5).				
04/01/15	6500898	Review production received from Kuntry Kustom and correspondence to Receiver re: the same (0.4); Prepare subpoena to CNB (0.3).	Hsu, Tim	0.7	236.25	2,229.30
04/02/15	6499648	Review and respond to emails regarding service of subpoenas and update and forward spreadsheet tracking status of subpoenas.	Kaup, John T.	1.8	405.00	2,634.30
04/02/15	6498974	Communications with counsel for Georgia Production Services regarding document production, affidavit from GPS, and funds held by Receiver, advise Receiver regarding same, and revisions to affidavit regarding lack of affiliation to Oasis (2.8); call from Apache Rentals regarding subpoena and document production (.2); follow up call and email to Deborah Keller's counsel regarding subpoena and document production (.2).	Fates, Edward G.	3.2	1,483.20	4,117.50
04/03/15	6500974	Review documents and prepare for meeting with Wishner and A. Solero and discuss same with A. Kudla (2.6); attend meeting with Wishner and A. Solero to discuss Oasis assets, business, loans, records, and related issues (5.7); travel to and from meeting in Woodland Hills (1.5); communications with counsel for Fiji Rentals (.2).	Fates, Edward G.	10.0	4,635.00	8,752.50
04/05/15	6506936	Communications with counsel for Georgia Production Services	Fates, Edward G.	0.1	46.35	8,798.85

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		regarding document production and affidavit.				
04/06/15	6502336	Review incoming responses to subpoenas.	Kaup, John T.	0.4	90.00	8,888.85
04/07/15	6503709	Review of latest productions/responses to subpoenas.	Kaup, John T.	0.2	45.00	8,933.85
04/07/15	6506930	Communications with Receiver and counsel for Georgia Production Services regarding document production and release of funds.	Fates, Edward G.	0.3	139.05	9,072.90
04/07/15	6521332	Calls with Desmond Studio re: subpoena and document production (0.4); Correspondence with receiver re: documents produced by Desmond Studio (0.2).	Hsu, Tim	0.6	202.50	9,275.40
04/08/15	6504617	Review status of subpoenas and document responses.	Kaup, John T.	0.1	22.50	9,297.90
04/08/15	6506929	Discuss affiliate status and payments from studios for trailer rentals with A. Kudla and K. Berry (.2); communications with counsel for L. Freede and Wishner regarding recovery of settlement payments (.3).	Fates, Edward G.	0.5	231.75	9,529.65
04/08/15	6504359	Call with A.Nader re: subpoena to Laurelwood Place (0.2).	Hsu, Tim	0.2	67.50	9,597.15
04/09/15	6506033	Review and update information on responses to subpoenas.	Kaup, John T.	0.2	45.00	9,642.15
04/09/15	6521437	Correspondences and calls with Desmonds re: production of documents (0.3); Review Desmonds' document production and correspondence to Receiver re: the same (0.4); Review production from	Hsu, Tim	1.1	371.25	10,013.40

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		Hollywood Wagons and Heritage (0.3); Correspondence to Receiver's office re: Hollywood Wagons and Heritage production (0.1).				
04/10/15	6507070	Update information regarding responses to subpoenas and forward tracking spreadsheet to client.	Kaup, John T.	0.9	202.50	10,215.90
04/10/15	6506937	Respond to counsel for Laurelwood regarding document subpoena.	Fates, Edward G.	0.1	46.35	10,262.25
04/13/15	6509071	Review document productions and update information regarding responses to subpoenas.	Kaup, John T.	1.1	247.50	10,509.75
04/13/15	6507824	Discuss Wishner/Oasis issues with A. Kudla and list of follow up items from Wishner meeting (.3); communications with Wishner's counsel regarding turnover of L. Freede payments (.2); communications with counsel for KER, LLC regarding document production and funds received from NASI and Oasis (.2); follow up communications to counsel for D. Keller (.1).	Fates, Edward G.	0.8	370.80	10,880.55
04/14/15	6509370	Review emails with productions and update spreadsheet tracking subpoenas.	Kaup, John T.	0.2	45.00	10,925.55
04/14/15	6508569	Call with counsel for Fiji regarding document production, ownership of trailers and related issues (.6); follow up communications with L. Freede's counsel regarding settlement payments (.2); call with M. Soffa regarding Fuel Doctor issues (.2).	Fates, Edward G.	1.0	463.50	11,389.05

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04/15/15	6511197	Call with counsel for KER, LLC regarding return of loan funds from NASI and Oasis and communications with R. Keller and Wishner's counsel regarding same (.5); communications with R. Keller regarding settlement of Fiji issues (.2); communications with L. Freede's counsel and Wishner's counsel regarding settlement payment instructions and discuss same with A. Kudla (.4); communications with counsel for D. Keller regarding document production (.1).	Fates, Edward G.	1.2	556.20	11,945.25
04/16/15	6515653	Call with witness claimant as to the Oasis assets, evidence in support of claims/conversion of local assets by husband of witness and relationship with defendant Wisher (.6). Follow-up review of documents and background of transfers by Wisher, conversion of assets (.5).	Zaro, David R.	1.1	712.80	12,658.05
04/16/15	6512871	Update spreadsheet tracking subpoena status; review documents and proofs received.	Kaup, John T.	0.2	45.00	12,703.05
04/16/15	6511964	Discuss response to subpoena from counsel for BST Power and strategy regarding same with A. Kudla and K. Berry (.2); discuss L. Freede payments and Fuel Doctor issues with A. Kudla (.2); communications with Wishner's counsel regarding additional bank statements needed from Wishner's office and discuss same with A. Kudla (.3); advise on issues regarding D. Keller document	Fates, Edward G.	1.3	602.55	13,305.60

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		production and communications with D. Keller's counsel (.4); communications with KER's counsel regarding return of loan proceeds to Receiver (.2).				
04/17/15	6514146	Review email regarding status of response to subpoena.	Kaup, John T.	0.1	22.50	13,328.10
04/17/15	6513504	Follow up communications regarding Wishner's payment instruction to L. Freede (.1); communications with Wishner's counsel and A. Kudla regarding pick up of additional bank records from Wishner's office (.2); review correspondence and documents received from Fiji Rentals and discuss same with A. Kudla (.3).	Fates, Edward G.	0.6	278.10	13,606.20
04/20/15	6515260	Review responses to document subpoenas and update spreadsheet tracking status.	Kaup, John T.	0.2	45.00	13,651.20
04/20/15	6514571	Call from R. Keller regarding potential sale of L. Gauff trailers (.2); communications with A. Kudla regarding pick up of additional records from Wishner's office and communications with Wishner's counsel regarding same (.2); discuss Fiji Rentals, Damien Perillo, US Bank subpoena, Oasis transfers, Laurelwood transfers, and related issues with A. Kudla (.7).	Fates, Edward G.	1.1	509.85	14,161.05
04/20/15	6525300	Review production from Laurelwood and Natwest and correspondence to Receiver re: the same (0.3).	Hsu, Tim	0.3	101.25	14,262.30
04/21/15	6516893	Review/analysis of the discovery requests concerning NASI from the	Zaro, David R.	0.7	453.60	14,715.90

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Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		defendant's counsel, assess response and cooperation (.3). Call with Ms. Debra Keller and address the discovery demands re Oasis, Wishner and Robert Keller (.4).				
04/21/15	6516379	Review supplemental responses to subpoenas and update spreadsheet tracking responses.	Kaup, John T.	0.2	45.00	14,760.90
04/21/15	6515334	Call from R. Keller regarding Fiji/Oasis issues (.1); review letter regarding document production from L. Freede's counsel (.1); review Laurelwood objections to subpoena and discuss Laurelwood/Natwest and Citi Bank account issues with A. Kudla (.5); review and discuss correspondence from FTP Productions with A. Kudla (.1); communications with KER's counsel regarding repayment of loan (.2).	Fates, Edward G.	1.0	463.50	15,224.40
04/22/15	6517476	Review supplemental responses to subpoenas.	Kaup, John T.	0.1	22.50	15,246.90
04/23/15	6518092	Call from R. Keller regarding L. Gauff vehicles and accounting of Fiji rentals (.2); communications with KER's counsel regarding loan pay down (.2).	Fates, Edward G.	0.4	185.40	15,432.30
04/27/15	6520573	Review and respond to inquiry from Wishner's counsel regarding payments from L. Freede and discuss same with A. Kudla.	Fates, Edward G.	0.2	92.70	15,525.00
04/28/15	6522307	Discuss L. Freede accounting issues with A. Kudla.	Fates, Edward G.	0.1	46.35	15,571.35
04/29/15	6523810	Calls from Debra Keller re Oasis, follow-up with counsel re same (.3).	Zaro, David R.	0.7	453.60	16,024.95

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		Emails related to Oasis documents and subpoena (.4).				
04/29/15	6522519	Communications with A. Kudla regarding check from KER, follow up communications with KER counsel regarding remaining loan amount (.3); communications with Wishner counsel regarding L. Freede payments, discuss same with A. Kudla (.4); follow up communications with D. Keller counsel re production of documents (.2).	Fates, Edward G.	0.9	417.15	16,442.10
04/30/15	6524452	Call with R. Keller counsel regarding potential sale of Keller property, debts owed to Oasis, and protection of sale proceeds in escrow.	Fates, Edward G.	0.4	185.40	16,627.50
05/01/15	6528473	Call from Robert Keller regarding Oasis/Fiji issues and resolution of same.	Fates, Edward G.	0.2	92.70	16,720.20
05/05/15	6529597	Review documents produced by Fiji Rentals.	Fates, Edward G.	0.1	46.35	16,766.55
05/06/15	6532047	Communications with A. Kudla regarding Studio Maui Productions.	Fates, Edward G.	0.1	46.35	16,812.90
05/07/15	6532698	Communications with counsel for KER regarding amounts due and discuss same with A. Kudla (.2); calls from R. Keller regarding accounting for trailer rentals, payoff of same, assignment of leases to Fiji, and related issues and discuss same with A. Kudla (.7).	Fates, Edward G.	0.9	417.15	17,230.05
05/08/15	6534925	Work on investigation as to Oasis entity, analysis of transferees of Oasis funds and possible claw back	Zaro, David R.	0.9	583.20	17,813.25

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		options (.6). Follow-up on discovery, calls related to outside discovery and call with counsel re discovery to obtain third party (.3).				
05/08/15	6533473	Discuss information from R. Keller with A. Kudla (.2); communications with D. Keller (.1).	Fates, Edward G.	0.3	139.05	17,952.30
05/11/15	6535100	Discuss status and action items for investigation into Oasis, Fiji, Studio Maui, and related issues with A. Kudla (.6); follow up communications with L. Freede counsel regarding payments (.2); follow up communications with Wishner's counsel regarding Studio Maui (.2).	Fates, Edward G.	1.0	463.50	18,415.80
05/11/15	6550585	Correspondence with Receiver's staff re: subpoena to Kuntry Kustom (0.2); Review previous services of subpoena and production of records from Kuntry Kustom (0.3).	Hsu, Tim	0.5	168.75	18,584.55
05/12/15	6536604	Discuss KER loan repayment issues with A. Kudla and communications with KER's counsel regarding same (.6); follow up communication to Wishner's counsel regarding turnover of L. Freede funds (.1).	Fates, Edward G.	0.7	324.45	18,909.00
05/15/15	6540656	Communications with KER's counsel regarding payoff of loan and advise A. Kudla regarding same (.4); follow up emails with D. Keller counsel (.2).	Fates, Edward G.	0.6	278.10	19,187.10
05/18/15	6541209	Communications with A. Kudla regarding checks from Wishner and L. Freede for settlement funds (.2); check status of R&S subpoena (.1).	Fates, Edward G.	0.3	139.05	19,326.15

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05/18/15	6551523	Correspondences with Receiver's staff re: subpoena to R&S RV Repair (0.2); Calls to R&S RV Repair to demand production (0.2).	Hsu, Tim	0.4	135.00	19,461.15
05/19/15	6542355	Follow up communications with Wishner's counsel regarding Studio Maui issues (.2); review information from A. Kudla regarding Oasis trailers and Fiji/BST Power and discuss facts, issues, and next steps regarding same (.6); work on obtaining D. Keller documents (.1).	Fates, Edward G.	0.9	417.15	19,878.30
05/20/15	6545861	Check status of subpoenas and respond to Mr. Hsu's email regarding R&S RV Repair.	Kaup, John T.	0.3	67.50	19,945.80
05/20/15	6545405	Attention to issues regarding endorsement of check from Wishner to Receiver and advise A. Kudla regarding same.	Fates, Edward G.	0.4	185.40	20,131.20
05/20/15	6551860	Response to Receiver's inquiry re: burden of costs for production in response to subpoenas (0.3); Discussion with R&S RV Repair re: subpoena and required production (0.4); Provide update to Receiver re: R&S RV Repair (0.2).	Hsu, Tim	0.9	303.75	20,434.95
05/21/15	6547006	Telephone call from Mr. Hsu and forward copy of FTP subpoena with proof.	Kaup, John T.	0.2	45.00	20,479.95
05/21/15	6546409	Review and revise letter to R&S regarding subpoena and document production (.1); communications with counsel for FTP Productions regarding trailer lease payments (.1);	Fates, Edward G.	0.3	139.05	20,619.00

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		discuss new subpoena to ABC Studios with A. Kudla (.1).				
05/21/15	6552080	Prepare subpoena to ABC Studios (0.3).	Hsu, Tim	0.3	101.25	20,720.25
05/22/15	6548222	Research and forward address for R&S RV Repair.	Kaup, John T.	0.2	45.00	20,765.25
05/22/15	6547193	Communications with counsel for L. Freede regarding settlement payments and issue regarding bank loan.	Fates, Edward G.	0.2	92.70	20,857.95
05/26/15	6548291	Communications with A. Kudla regarding payment from KER.	Fates, Edward G.	0.1	46.35	20,904.30
05/26/15	6550518	Correspondence with Receiver re: subpoena to R&S RV Repair (0.1); Discussion with BST Power on inquiry re: payments purportedly withheld by ABC Studios (0.4).	Hsu, Tim	0.5	168.75	21,073.05
05/27/15	6549479	Communications with counsel for KER regarding payment and additional transfer to KER and discuss same with A. Kudla (.4); call with R. Keller regarding potential resolution of Oasis/Fiji trailer issues (.2).	Fates, Edward G.	0.6	278.10	21,351.15
05/28/15	6555404	Call with R&S RV Repair to discuss subpoena and required document production (0.3); Send follow email to demand production to R&S RV (0.2).	Hsu, Tim	0.5	168.75	21,519.90
05/29/15	6553618	Communications with KER's counsel regarding accounting of transfers (.2); communications with A. Kudla regarding Studio Maui, KER, Fiji, and related issues (.4).	Fates, Edward G.	0.6	278.10	21,798.00

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06/03/15	6559244	Review materials for preparation of third-party subpoenas for documents and telephone call with Mr. Hsu.	Kaup, John T.	0.4	90.00	21,888.00
06/03/15	6557565	Review documents relating to new document subpoenas to be issued, discuss same with A. Kudla, and work on subpoenas.	Fates, Edward G.	0.8	370.80	22,258.80
06/03/15	6583268	Prepare additional subpoena to Dana Point as template for new round of subpoenas (0.5); Review records produced by Touchstone Television and correspondence to Receiver's staff re: the same (0.3).	Hsu, Tim	0.8	270.00	22,528.80
06/04/15	6560485	Review information for parties to subpoena for documents; draft third-party subpoenas.	Kaup, John T.	1.8	405.00	22,933.80
06/05/15	6561740	Prepare subpoenas to third parties for production of documents.	Kaup, John T.	2.5	562.50	23,496.30
06/05/15	6560596	Review and execute document subpoenas to additional third parties regarding Oasis-related transfers (.3); communications with Wishner's counsel regarding transfers to Devonshire Group and documents needed regarding same (.2); communications with counsel for KER regarding receipt for payments (.1).	Fates, Edward G.	0.6	278.10	23,774.40
06/08/15	6563778	Review status of subpoenas and update spreadsheet tracking status.	Kaup, John T.	0.4	90.00	23,864.40
06/09/15	6564770	Update spreadsheet tracking subpoena status; research addresses for witnesses.	Kaup, John T.	0.9	202.50	24,066.90
06/09/15	6563694	Communications with R. Keller's	Fates, Edward G.	0.7	324.45	24,391.35

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		counsel regarding divorce proceeding and sale of Oregon property (.2); follow up regarding D. Keller's production of records (.1); review R&S document production, correspondence regarding same, and advise on next steps/enforcement of subpoena (.4).				
06/09/15	6583244	Call with counsel for SH Equity Holdings to discuss subpoena and lack of responsive records (0.4); Gather and review piecemeal production of records from R&S Producitons (0.3); Correspondences with Receiver's staff re: lack of response from R&S Productions and SH Equity Holdings (0.7).	Hsu, Tim	1.4	472.50	24,863.85
06/10/15	6566510	Review and update status on subpoenas; review information on new witnesses to serve subpoenas for production of documents.	Kaup, John T.	0.9	202.50	25,066.35
06/10/15	6565880	Calls with Shabani (counsel for Devonshire) re: subpoena for records (0.2); Correspondences with Receiver's staff re: records relating to Devonshire (0.2); Review information on additional entities to subpoena as provided by Receiver's staff (0.6); Confirm issues with Receiver's staff re: subpoena to SH Equity Holdings (0.2); Conference calls with Receiver's staff and R&S RV Repair to discuss subpoena and requested production (0.9); Follow up correspondence to R&S RV Repair re: requested production of records	Hsu, Tim	2.6	877.50	25,943.85

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		(0.5).				
06/11/15	6567360	Begin preparation of additional subpoenas for production of documents; telephone conference with Mr. Hsu regarding details on subpoenas.	Kaup, John T.	2.0	450.00	26,393.85
06/12/15	6568428	Continue work on third-party subpoenas for production of documents.	Kaup, John T.	1.8	405.00	26,798.85
06/15/15	6570204	Finalize next round of subpoenas for document production; update spreadsheet tracking status; research regarding 313 High Street LLC.	Kaup, John T.	1.5	337.50	27,136.35
06/15/15	6568392	Communications with Wishner's counsel and L. Freede's counsel regarding letter requested by L. Freede's counsel (.2); discuss subpoena to R&S RV Repair with A. Kudla and communications with CPA for R&S RV Repair regarding same (.7); calls and emails with counsel for R. Leyner regarding document subpoena (.5); finalize additional round of subpoenas for Oasis investments/transfers (.2); review response to subpoena from NAI Capital and discuss same with A. Kudla (.1); review information regarding new Wishner-related entity and discuss same with A. Kudla (.2); follow up communications to Wishner's counsel regarding Devonshire documentation (.2).	Fates, Edward G.	2.1	973.35	28,109.70
06/16/15	6572446	Update spreadsheet tracking status of subpoenas; prepare subpoena to 313	Kaup, John T.	1.1	247.50	28,357.20

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		High Street LLC.				
06/16/15	6569642	Discuss new document subpoena to 313 High Street LLC with A. Kudla and finalize subpoena (.4); communications with Wishner's counsel regarding Devonshire subpoena and Wishner's medical condition (.1); communications with R. Keller regarding settlement (.1).	Fates, Edward G.	0.6	278.10	28,635.30
06/17/15	6572419	Update spreadsheet tracking status of subpoenas.	Kaup, John T.	0.3	67.50	28,702.80
06/18/15	6573418	Update spreadsheet tracking subpoenas; review documents regarding status; analyze enforcing subpoenas on non-responsive third parties.	Kaup, John T.	1.3	292.50	28,995.30
06/18/15	6572442	Review documents produced by Insurance West and discuss same with A. Kudla (.3); work on follow up letters to subpoena recipients (.1); call from Zio Rentals regarding document subpoena, Oasis entities, R. Keller, and related issues (.4); call from counsel for Sepna regarding document subpoena, dealing with Oasis, and tie in to Laurelwood (.3).	Fates, Edward G.	1.1	509.85	29,505.15
06/19/15	6575034	Prepare letters to third-party witnesses with no responses to subpoenas; update spreadsheet tracking status; review document productions.	Kaup, John T.	2.3	517.50	30,022.65
06/19/15	6573593	Revise and execute letters to subpoena recipients regarding failure to respond or produce documents (.2); communications with R. Keller	Fates, Edward G.	0.9	417.15	30,439.80

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		regarding settlement of Oasis/Fiji issues and discuss same with A. Kudla (.6); communications with Wishner's counsel regarding B. Richmond (.1).				
06/22/15	6576172	Continue to monitor responses to and status of third-party subpoenas.	Kaup, John T.	0.5	112.50	30,552.30
06/23/15	6577039	Follow up on service of Todd Sanders; review and respond to email regarding response by Catherine Nguyen.	Kaup, John T.	0.4	90.00	30,642.30
06/24/15	6578173	Follow up on service and responses of third-party witnesses.	Kaup, John T.	0.4	90.00	30,732.30
06/25/15	6579149	Follow up and update spreadsheet tracking status of third-party subpoenas.	Kaup, John T.	0.3	67.50	30,799.80
06/25/15	6578958	Review information and records provided by C.Nguyen from LED Productions (0.2); Calls with C.Nguyen from LED Productions re: subpoena and inadequate responses provided (0.6); Correspondence to Receiver's staff to provide update re: the same (0.1); Correspondence with US Bank re: additional production of records (0.3).	Hsu, Tim	1.2	405.00	31,204.80
06/26/15	6583287	Call with counsel for Fratelli's Pizza to discuss outstanding subpoena and required response (0.5); Call with H.Soffa and M.Soffa re: subpoenas to H.Soffa and Hanna Vineyards (0.4); Review H.Soffa production and letter response (0.3); Review additional records produced by Nguyen and LED Production (0.3); REview	Hsu, Tim	2.5	843.75	32,048.55

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		response from P.McCormick (0.2); Review resposnes from R.Leyner and V.Owen Group (0.4); Correspondences to Receiver's staff to provide updates on outstanding subpoenas and responses received the same (0.4).				
06/29/15	6587187	Review additional records produced by C.Nguyen and LED Productions and provide update to Receiver's staff (0.3); Review production of records from Best Studio Rental and provide update to Receiver's staff (0.3).	Hsu, Tim	0.6	202.50	32,251.05

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David R. Zaro	3.4	648.00	2,203.20
000820	John T. Kaup	25.2	225.00	5,670.00
001665	Edward G. Fates	41.6	463.50	19,281.60
002055	Tim Hsu	15.1	337.50	5,096.25
		<u>85.3</u>		<u>32,251.05</u>
Total Fees				32,251.05
Total Disbursements				0.00

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Preliminary Billing Form

Billing Atty: 001665 - Fates

Matter #: 374464-00004

Matter Name: Reporting

Date of Last Billing: 05-05-2015

Client Name: William J. Hoffman, Receiver for NASI

Proforma Number 1220788

Client/Matter Joint Group # 374464-1

Fees for Matter 374464-00004 (Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
04/24/15	6519096	Work on Receiver's Third Interim Report.	Fates, Edward G.	0.8	370.80	370.80
04/29/15	6522922	Work on Receiver's third interim report.	Fates, Edward G.	2.1	973.35	1,344.15
05/06/15	6530916	Work on Receiver's Third Interim Report.	Fates, Edward G.	0.6	278.10	1,622.25
05/07/15	6532542	Call with D. Wallace to discuss facts for interim report (.2); work on Third Interim Report and discuss same with A. Kudla (1.9).	Fates, Edward G.	2.1	973.35	2,595.60
05/11/15	6535096	Discuss content and revisions to Third Interim Report with A. Kudla.	Fates, Edward G.	0.2	92.70	2,688.30
05/14/15	6539064	Work on Third Interim Report and discuss same with A. Kudla (1.1); send report and exhibits to counsel for parties (.2).	Fates, Edward G.	1.3	602.55	3,290.85
05/19/15	6544345	Review questions from SEC's counsel regarding report, initial response to same, and discuss further responses to questions with A. Kudla.	Fates, Edward G.	0.7	324.45	3,615.30
05/26/15	6548524	Prepare response to questions from SEC's counsel relating to Third Interim Report, review data and	Fates, Edward G.	0.7	324.45	3,939.75

07/16/15 14:11:37 PROFORMA STATEMENT FOR MATTER 374464-00004 (Reporting) 374464-00004

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		discuss same with A. Kudla.				

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward G. Fates	8.5	463.50	3,939.75
		<u>8.5</u>		<u>3,939.75</u>
Total Fees				3,939.75
Total Disbursements				0.00

07/16/15 14:11:37 PROFORMA STATEMENT FOR MATTER 374464-00006 (Claims & Distributions) 374464-00006

Preliminary Billing Form

Billing Atty: 001665 - Fates

Matter #: 374464-00006

Matter Name: Claims & Distributions

Date of Last Billing: 06-22-2015

Client Name: William J. Hoffman, Receiver for NASI

Proforma Number 1220791

Client/Matter Joint Group # 374464-1

Fees for Matter 374464-00006 (Claims & Distributions)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
04/01/15	6498428	Advise Receiver regarding response to investor legal inquiry (.2); communications with counsel for investor (.1).	Fates, Edward G.	0.3	139.05	139.05
04/02/15	6499124	Respond to inquiry from counsel for investor (.1); review letter from investor regarding clawback motion (.1).	Fates, Edward G.	0.2	92.70	231.75
04/06/15	6502162	Call with M.Soffa on inquiry re: 1099s (0.1); Correspondence to Receiver's staff re: status of 1099s (0.1).	Hsu, Tim	0.2	67.50	299.25
04/07/15	6521315	Correspondences with Receiver re: issuance of 1099s for receivership entities (0.2); Handle call from Soffa re: issuance of 1099s (0.3).	Hsu, Tim	0.5	168.75	468.00
04/13/15	6507822	Discuss investor inquiries regarding 1099s with A. Kudla (.1); review documents faxed from investor (.1).	Fates, Edward G.	0.2	92.70	560.70
04/14/15	6509184	Communications with M. Soffa regarding 1099/tax issues and discuss same with K. Berry.	Fates, Edward G.	0.2	92.70	653.40
04/15/15	6511511	Discuss responses to additional investor inquiries regarding taxes and	Fates, Edward G.	0.2	92.70	746.10

07/16/15 14:11:37 PROFORMA STATEMENT FOR MATTER 374464-00006 (Claims & Distributions) 374464-00006

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		1099s with A. Kudla.				
04/28/15	6522301	Review investor correspondence regarding 1099s and discuss same with A. Kudla.	Fates, Edward G.	0.2	92.70	838.80
05/05/15	6529590	Call from counsel for NASI investor.	Fates, Edward G.	0.1	46.35	885.15
05/20/15	6546281	Emails to/from counsel for investor re claims/status communications re whistleblower (.4).	Zaro, David R.	0.4	259.20	1,144.35
05/20/15	6545084	Attention to inquiry from counsel for investor.	Fates, Edward G.	0.1	46.35	1,190.70
06/05/15	6564004	Email/follow-up on investors' assertion of claims and communications related to the response with Receiver (.2).	Zaro, David R.	0.2	129.60	1,320.30
06/08/15	6562648	Discuss updates to receivership website with A. Kudla (.1); respond to inquiry from counsel for investor (.2).	Fates, Edward G.	0.3	139.05	1,459.35
06/17/15	6571272	Respond to inquiry from investor.	Fates, Edward G.	0.2	92.70	1,552.05
06/25/15	6587152	Call with investor J. Hasson to field inquiries re: receivership and status of claims administration process (0.4).	Hsu, Tim	0.4	135.00	1,687.05

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David R. Zaro	0.6	648.00	388.80
001665	Edward G. Fates	2.0	463.50	927.00
002055	Tim Hsu	1.1	337.50	371.25
		<u>3.7</u>		<u>1,687.05</u>
Total Fees				1,687.05
Total Disbursements				0.00

07/16/15 14:11:37 PROFORMA STATEMENT FOR MATTER 374464-00007 (Third Party Recoveries) 374464-00007

Preliminary Billing Form

Billing Atty: 001665 - Fates

Matter #: 374464-00007

Matter Name: Third Party Recoveries

Date of Last Billing: 06-22-2015

Client Name: William J. Hoffman, Receiver for NASI

Proforma Number 1220796

Client/Matter Joint Group # 374464-1

Fees for Matter 374464-00007 (Third Party Recoveries)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
04/01/15	6498556	Gather information on potential firms for third party claims and discuss same with Receiver (.7); work on subpoena for records regarding potential third party claims and communications with D. Wallace regarding same (.9).	Fates, Edward G.	1.6	741.60	741.60
04/02/15	6502580	Work on issues re claw back actions, advice to counsel re same (.4).	Zaro, David R.	0.4	259.20	1,000.80
04/06/15	6506935	Review SEC's non-opposition to clawback motion.	Fates, Edward G.	0.1	46.35	1,047.15
04/09/15	6506927	Arrange call with counsel for prospective defendants in clawback lawsuits.	Fates, Edward G.	0.1	46.35	1,093.50
04/13/15	6507055	Call from potential counsel for investor class regarding claims and documents regarding third parties (.2); discuss bank subpoena with A. Kudla (.2); call with counsel for certain net gainers regarding clawbacks and potential settlements/financial hardship and discuss same with Receiver (.8); discuss third party claims and clawback demand letters with A.	Fates, Edward G.	1.8	834.30	1,927.80

07/16/15 14:11:37 PROFORMA STATEMENT FOR MATTER 374464-00007 (Third Party Recoveries) 374464-00007

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		Kudla (.4); arrange conference call to discuss clawback accounting and strategy regarding third party claims (.2).				
04/14/15	6509703	Advice as to the motion on third party claims, strategy and approach to cost effectively pursuing claims by Receiver (.3).	Zaro, David R.	0.3	194.40	2,122.20
04/14/15	6508258	Respond to counsel for certain net gainers regarding clawbacks and potential settlements/financial hardship.	Fates, Edward G.	0.4	185.40	2,307.60
04/15/15	6511421	Calls with Receiver, D. Wallace and A. Kudla to discuss potential conflicts counsel to evaluate potential claims against City National Bank and forensic accounting/timing for clawback demand letters.	Fates, Edward G.	1.2	556.20	2,863.80
04/16/15	6512379	Discuss facts, timing, and engagement of conflicts counsel regarding potential claims against City National Bank with A. Kudla.	Fates, Edward G.	0.7	324.45	3,188.25
04/21/15	6515964	Review order granting clawback procedures motion and discuss same with Receiver (.2); discuss preparation of clawback demand letters and accompanying schedules, financial hardship procedures, and tracking of same with A. Kudla (.4).	Fates, Edward G.	0.6	278.10	3,466.35
04/28/15	6522305	Discuss demand letter for clawback claims with A. Kudla.	Fates, Edward G.	0.2	92.70	3,559.05
04/29/15	6522515	Work on demand letter to net gainers, discuss same with A. Kudla.	Fates, Edward G.	1.3	602.55	4,161.60

07/16/15 14:11:37 PROFORMA STATEMENT FOR MATTER 374464-00007 (Third Party Recoveries) 374464-00007

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
05/01/15	6528464	Discuss modifications to clawback demand letter and accounting issues regarding same with A. Kudla.	Fates, Edward G.	0.3	139.05	4,300.65
05/06/15	6531021	Revisions to clawback demand letter for referral fees and discuss same with A. Kudla.	Fates, Edward G.	0.6	278.10	4,578.75
05/07/15	6532537	Call with D. Wallace to discuss issues regarding potential claims against CNB (.3); respond to inquiry from counsel representing NASI investors regarding CNB issues (.2).	Fates, Edward G.	0.5	231.75	4,810.50
05/11/15	6535098	Review accounting for clawback demand letters for investor profits and referral fees and discuss same with A. Kudla.	Fates, Edward G.	0.5	231.75	5,042.25
05/15/15	6540807	Review criminal case docket and statement of facts for Gillis's guilty plea for use in connection with clawback claims.	Fates, Edward G.	0.4	185.40	5,227.65
05/19/15	6544350	Discuss clawback settlement received with A. Kudla.	Fates, Edward G.	0.1	46.35	5,274.00
05/20/15	6546285	Review/evaluate the recovery efforts, progress and status of letter demands, timing/next steps toward recovery with regard to net-winners (.4). Call with counsel re same (.2).	Zaro, David R.	0.6	388.80	5,662.80
05/20/15	6545061	Call and emails to discuss CNB subpoena cost issues with A. Kudla (.4); discuss meeting with potential conflicts counsel on CNB issues with D. Wallace (.2).	Fates, Edward G.	0.6	278.10	5,940.90
05/22/15	6547145	Call with counsel for investor regarding demand letter, accounting	Fates, Edward G.	0.4	185.40	6,126.30

07/16/15 14:11:37 PROFORMA STATEMENT FOR MATTER 374464-00007 (Third Party Recoveries) 374464-00007

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		of profits and settlement, and advise A. Kudla regarding same.				
05/29/15	6553168	Communications with A. Kudla regarding accounting for net gainer and communications with counsel for net gainer regarding same and potential settlement.	Fates, Edward G.	0.5	231.75	6,358.05
06/01/15	6556116	Discuss search terms for CNB subpoena with A. Kudla; review and revise same.	Fates, Edward G.	0.3	139.05	6,497.10
06/02/15	6556885	Communications with counsel for net gainer and discuss same with A. Kudla.	Fates, Edward G.	0.4	185.40	6,682.50
06/03/15	6557331	Communications with D. Wallace regarding analysis of potential claims against CNB.	Fates, Edward G.	0.1	46.35	6,728.85
06/04/15	6559346	Discuss status and strategy regarding potential engagement of special counsel to pursue claims against CNB with D. Wallace (.5); review email from counsel for investor regarding potential claims against third parties and discuss same with D. Wallace (.2).	Fates, Edward G.	0.7	324.45	7,053.30
06/08/15	6562294	Review executed settlement of clawback claim from counsel for net gainer and discuss same with A. Kudla (.3); communications with potential investor class counsel regarding third party claims and advise D. Wallace regarding same (.4).	Fates, Edward G.	0.7	324.45	7,377.75
06/15/15	6569067	Revisions to stipulated judgment for net gainer settlement and discuss	Fates, Edward G.	0.6	278.10	7,655.85

07/16/15 14:11:37 PROFORMA STATEMENT FOR MATTER 374464-00007 (Third Party Recoveries) 374464-00007

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
		same with A. Kudla (.4); respond to call from counsel for net gainer (.2).				
06/16/15	6570268	Call and emails with counsel for net winner regarding potential settlement of clawback claim and advise A. Kudla regarding same.	Fates, Edward G.	0.9	417.15	8,073.00
06/17/15	6571459	Send executed settlement agreement to F. Rapp counsel (.1); call with counsel for M. Tarnol regarding potential hardship submission and review and requirements of same (.4).	Fates, Edward G.	0.5	231.75	8,304.75
06/19/15	6574069	Discuss clawback demands, accounting, settlements and financial hardship issue with A. Kudla.	Fates, Edward G.	0.4	185.40	8,490.15
06/25/15	6587155	Analysis of issues raised by potential net winner re: scope of receiver's ability to pursue clawback claims and related statutes of limitations and repose (1.8).	Hsu, Tim	1.8	607.50	9,097.65
06/29/15	6587185	Review and research case law on issues re: maintaining clawback claims through probate (2.1); Provide summary analysis to Receiver's staff re: the same (0.6).	Hsu, Tim	2.7	911.25	10,008.90

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	David R. Zaro	1.3	648.00	842.40
001665	Edward G. Fates	16.5	463.50	7,647.75
002055	Tim Hsu	4.5	337.50	1,518.75
		22.3		10,008.90
Total Fees				10,008.90
Total Disbursements				0.00

07/16/15 14:11:37 PROFORMA STATEMENT FOR MATTER 374464-00008 (Pending Litigation) 374464-00008

Preliminary Billing Form

Billing Atty: 001665 - Fates

Matter #: 374464-00008

Matter Name: Pending Litigation

Date of Last Billing:

Client Name: William J. Hoffman, Receiver for NASI

Proforma Number 1220799
Client/Matter Joint Group # 374464-1

Fees for Matter 374464-00008 (Pending Litigation)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
04/02/15	6499329	Call from Keller's counsel regarding L. Gauff lawsuit and stay as to Oasis (.3); call with counsel for L. Gauff regarding lawsuit against Oasis and Keller and dismissal of Oasis from same (.4).	Fates, Edward G.	0.7	324.45	324.45

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward G. Fates	0.7	463.50	324.45
		<u>0.7</u>		<u>324.45</u>
Total Fees				324.45
Total Disbursements				0.00

07/16/15 14:11:37 PROFORMA STATEMENT FOR MATTER 374464-00009 (Employment/Fees) 374464-00009

Preliminary Billing Form

Billing Atty: 001665 - Fates

Matter #: 374464-00009

Matter Name: Employment/Fees

Date of Last Billing: 06-22-2015

Client Name: William J. Hoffman, Receiver for NASI

Proforma Number 1220802

Client/Matter Joint Group # 374464-1

Fees for Matter 374464-00009 (Employment/Fees)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum
05/18/15	6542038	Review and revise Receiver's second interim fee application and discuss same with A. Kudla.	Fates, Edward G.	1.4	648.90	648.90
06/04/15	6559506	Communications with SEC's counsel regarding second interim fee applications, discuss issues with A. Kudla, and draft detailed response to SEC's counsel's inquiries.	Fates, Edward G.	1.7	787.95	1,436.85
06/05/15	6560256	Revisions to Receiver's second fee application and prepare proposed orders and notice of hearing.	Fates, Edward G.	0.9	417.15	1,854.00
06/08/15	6561983	Finalize Receiver's second fee application.	Fates, Edward G.	0.2	92.70	1,946.70
06/16/15	6570028	Review order approving second fee applications and advise Receiver regarding same.	Fates, Edward G.	0.1	46.35	1,993.05

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Edward G. Fates	4.3	463.50	1,993.05
		<u>4.3</u>		<u>1,993.05</u>
Total Fees				1,993.05

07/16/15 14:11:37 PROFORMA STATEMENT FOR MATTER 374464-00009 (Employment/Fees) 374464-00009

Total Disbursements

0.00