EXHIBIT B

EXHIBIT B-1

RaPower-3, LLC Time Detail for Receiver and Klein & Associates January 1, 2021 to March 31, 2021

Date	Worker	Hours	Rate	Amount	Description	Category
1/1/2021	L WK	4.4	250.00	1,100.00	Work on status report; prepare financial summary; update litigation log.	Status Report
1/2/2021	L WK	1.3	250.00	325.00	Revise and edit draft report, send draft to Parr Brown and DOJ for comments.	Status Report
1/2/2021	l JS	1.3	120.00	156.00	Update website: add property sales box with four sales; add two postings to website.	Case Administration
1/4/2021	L WK	0.7	250.00	175.00	Read update on Payson home repairs, respond with directions (.2); call with DPI Land about options to purchase Delta land, my inability to grant long term options, send information to T. Belchak on possible partnership with DPI Land (.3); call with J. Balls on California legal description for re-submitting deed; search files, send copy of documents with full legal description and escrow company information.	Asset Disposition
1/4/2021	L WK	0.4	250.00	100.00	Pay utility bills; call with appraiser, pay fee; reconcile bank statements, send to J. Shupe to prepare annual financials.	Financial analysis
1/5/2021	L WK	2.2	250.00	550.00	Gather information on 2020 expenditures and possible 1099s to issue, send to BRG with questions (.7); read responses on 1099s needed; revise list of 1099s to send; contact dozens of contractors who received funds, requesting copies of W-9 forms (1.5)	Financial analysis
1/5/2021	L WK	0.8	250.00	200.00	Read order approving sale of Payson home, respond to J. Balls; respond to L. Mathews on accepting backup offer for Sherwood; email DPI Land on options for Delta land (.4); respond to broker on inspection on Payson Condo; respond to broker on inspection report for California condo; review inspection report (.4).	Asset Disposition
1/5/2021	L WK	1.1	250.00	275.00	Get order approving 7th settlement motion, update tracking log; get order on Anstram OSC, respond to J. Balls (.3); call with M. Lehr on difficulties in getting e-discovery from NSDP, discuss strategy, make notes of approach to follow (.8).	Litigation
1/6/2021	L WK	0.6	250.00	150.00	Call with broker on repairs to California condo (1); read preliminary title report for California condo, send to J. Balls, comments to broker (.3); revise motion to sell California condo (.2).	Asset Disposition
1/6/2021	L WK	1.5	250.00	375.00	Research files, identify vendors, repair workers; request W-9 tax forms from scores of vendors.	Financial analysis

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1/7/2021 WK	0.4 250.00	100.00 Review, sign FHA disclosures for Abraham home; call with California broker on repairs needed, authorize repairs to balcony, garage opener, window, tub (.2); respond to G. Shepard on need for notarization of hardship affidavit; review information from R. Creitz on property work (.2).	Asset Disposition
1/7/2021 WK	0.5 250.00	125.00 Receive and track W-9 forms, respond; log refunds; pay bills; review information on PacifiCorp minimum contract for Oasis warehouse; sign forms for California HOA.	Financial analysis
1/7/2021 WK	0.4 250.00	100.00 Call with D. Castleberry on Heideman and Reay discover, deposition dates, expert disclosures, SJ motion.	Litigation
1/8/2021 WK	0.9 250.00	225.00 Review and pay bills for work on Payson home, get updates on repairs; sign addendum for Payson condo on credit for repairs (.3); read Cubas appraisal for California condo, send to broker; revise sale motion and proposed order, send for filing; call HOA on signage repair (.4); review email from California broker on FHA appraiser; read request for repair, respond (.2).	·
1/11/2021 WK	0.3 250.00	75.00 Sign form authorizing repairs to be made by seller on California condo; sign backup offer for Sherwood Shores; call with T. Belchak on bidding for 67.5 acre property.	Asset Disposition
1/11/2021 WK	0.3 250.00	75.00 Review files, email S. Paul on settlement status with G. Shepard.	Asset Recovery
1/11/2021 WK	0.7 250.00	175.00 Review bank statements from LaGrand Johnson, respond to S. Paul with questions.	Investigation
1/12/2021 WK	0.2 250.00	50.00 Read list of additional repairs needed for Payson home, respond to L. Jones; pay plumbing invoice.	Asset Disposition
1/12/2021 WK	0.5 250.00	125.00 Read information from S. Paul on G. Shepard negotiations; email G. Shepard on information needed; call with insurance agent on Oasis insurance, notes of call.	Asset Recovery
1/12/2021 WK	0.6 250.00	150.00 Review information from S. Paul on Randale Johnson account statements, research which account statements are still missing; review new statements delivered; update log, respond.	Investigation
1/12/2021 WK	2.3 250.00	575.00 Research sources of payment for five properties transferred from Neldon Johnson to IAS, review files, read divorce settlement, get bankruptcy court filings; send results of research to M. Lehr.	Litigation
1/13/2021 WK	1.7 250.00	425.00 Review offer for 360 acres, email from broker, sign rejection of offer (.1); email L. Mathews on selling Topaz property to D'Agrella (.3); meet with T. Belchak on property sales; get bid deposit and signed bid agreement; discuss granting purchase option to solar energy developer, buyer of 1,120 acres (1.3).	Asset Disposition

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1/13/2021 WK	0.6 250.00	150.00 Call with M. Lehr on Ina Newman MSJ, discuss amounts to seek in summary judgment, theories for recovery.	Litigation
1/14/2021 WK	0.8 250.00	200.00 Review, sign new documents for sale of California condo (.2); respond to L. Mathews on sale of Topaz property to new buyer, review invoice and pay bills for CA repairs (.3); review, sign new offer for Topaz property; review title report for Payson home (.3).	Asset Disposition
1/14/2021 WK	0.5 250.00	125.00 Review response from Church of Jesus Christ agreeing to refund payments, draft settlement agreement, send (.3); call with insurance broker on Oasis warehouse; review policy options, respond (.2).	Asset Recovery
1/14/2021 WK	0.7 250.00	175.00 Call with DOJ (.6); call with J. Balls on hearing dates for property sales, MSJ response dates; conditions for higher offer for Payson home (.1).	Litigation
1/15/2021 WK	0.4 250.00	100.00 Verify receipt of wire from bidder for Sherwood Shores, respond with auction agreement; get signed addendum for Topaz sale; sign insurance application for Oasis; review and pay invoices for California work (.2); send information to title company for Topaz property, revise receiver deed language, send court orders (.2).	Asset Disposition
1/15/2021 WK	1.4 250.00	350.00 Analyze settlement offer from Chase Bank, review files, send lengthy response with settlement parameters (.5); read email from G. Shepard, order appraisal, respond on settlement proposal; review status of settlement payments for prior settlements, notify delinquent defendants (.8); call with insurance agent on Oasis insurance, give payment information, get confirmation of policy issuance (.1).	Asset Recovery
1/18/2021 WK	0.8 250.00	200.00 Create bidding log for auction of 4606; email L. Mathews on auction; respond to L. Mathews on who will attend auction (.5); get order approving sale of 4648, set auction date, send for publication; notify broker; reminder to MCCP on affidavits of publication (.3).	Asset Disposition
1/18/2021 WK	1.7 250.00	425.00 Respond to G. Shepard on meeting to discuss settlement; email DOJ on ediscovery issues with NSDP; email Parr Brown on Shepard meeting (.4); review new vehicle photos and VIN certifications; list estimated values; update vehicle tracking log (.5); call with R. Greathouse on vehicles, properties, Topaz poison; notes of call (.8)	Asset Recovery
1/18/2021 WK	0.8 250.00	200.00 Additional contact with contractors, requesting Tax ID numbers; email California HOA on signage.	Financial analysis
1/18/2021 WK	0.2 250.00	50.00 Read deposition subpoenas for Heideman, make list of topics for 30(b)(6) deposition of Heideman.	Litigation
1/19/2021 WK	4.2 0.00	0.00 Travel to Fillmore for auction of 4606 property; return (Time not billed.)	Asset Disposition

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1/19/2021 WK	2.0 250.00	500.00 Auction of property at Fillmore courthouse; discuss other properties with broker; get bid deposit from bidder for Sherwood Shores (1.1); send DOJ information on option for land; email solar company on option, log bid deposit; notify title company of new buyer for 4606; call with R. Greathouse on closing date for 67.5 acres; research listing agreement; sign cancellation of 3511-1; update property log (.9).	Asset Disposition
1/19/2021 WK	0.1 250.00	25.00 Work on letter to DMV requesting five new vehicle titles.	Asset Recovery
1/19/2021 WK	0.4 250.00	100.00 Log deposits for sale of assets; pay bill for dumpster at Abraham (.2); get new W9; revise list of 1099s to send, send list and 1099s to tax preparer.	Financial analysis
1/20/2021 WK	0.3 250.00	75.00 Call with T. Belchak on offer for Oasis warehouse (I rejected offer of \$50K) (.1); call with Summit Realty on sale of Payson condo, email J. Balls; send information on auction of 80 acres to T. Belchak (.2).	Asset Disposition
1/20/2021 WK	0.6 250.00	150.00 Review water right conveyance information from state on Abraham home, create list of all water rights (.1); continue review of certificates for new titles, sign ownership statements and applications, send to DMV and Sahara Motors (.5).	Asset Recovery
1/20/2021 WK	0.1 250.00	25.00 Read declaration by Randale Johnson and exhibits showing restoration of account balances and delivery of asset freeze notice.	Investigation
1/20/2021 WK	0.3 250.00	75.00 Review 1099s received; receive and pay utility bills, publication invoice; receive earnest money forfeited for Topaz property, log settlement payments, send wiring instructions to T. Belchak for 4606-2.	Financial analysis
1/20/2021 WK	0.7 250.00	175.00 Call with M. Lehr on legal theory for recovery from Ina Newman (.3); search for bank records showing payments to Ina Newman, request search by Lone Peak (.2); begin review of Heideman discovery request; work on response (.2).	Litigation
1/21/2021 WK	0.5 250.00	125.00 Respond to broker on status of court approval of Payson home (.1); call with T. Belchak on Sherwood Shores bid, Plaskolite lenses, address for Johnsons, water rights, hazardous chemicals; notify broker of interest (.4).	Asset Disposition
1/21/2021 WK	0.2 250.00	50.00 Calls to contractors to get four remaining W-9s, obtain two responses.	Financial analysis
1/21/2021 WK	4.2 250.00	1,050.00 Research payments to Backman Title for Ina Newman, call with Lone Peak Valuation (.4); work on Heideman discovery responses, respond to D. Castleberry on Heideman deposition (2.0); read draft MSJ for Ina Newman, create redline, send to M. Lehr with comments (1.8).	Litigation
1/22/2021 WK	0.2 250.00	50.00 Read title report for 4606-2, send information to T. Belchak on 4638 and 3511-1.	Asset Disposition

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1	./22/2021 WK	3.7	250.00	home (1.9); call appraisers, ins	truct them to do appraisals of Shepard home; find legal or J. Balls; draft settlement agreement for Shepard, send	Asset Recovery
1	L/22/2021 WK	1.8	0.00	0.00 Work on index of NSDP docum		Investigation
1	L/22/2021 WK	1.0	250.00		aration for Newman MSJ; research SEC filings to verify	Litigation
1	L/23/2021 WK	1.7	250.00	25.00 Review status of payments by 5	5 defendants, respond to J. Balls on dismissing lawsuits tion files; draft motion for approval of settlements, send	Asset Recovery
1	L/23/2021 JS	0.1	120.00	2.00 Update prior website posting		Case Administration
1	L/25/2021 WK	1.1	250.00	door number, notify broker; er California condo; review public	mail J. Balls on acceptability of hearing date, status of cation language for Payton home, Payson condo, send listing brokers (.6); create bidding log for Sherwood	Asset Disposition
1	L/25/2021 WK	0.5	250.00		end copies of documents from NSDP boxes relating to	Litigation
1	1/26/2021 WK	4.7	0.00			Asset Disposition
1	./26/2021 WK	2.3	250.00	other properties for sale, poter payments from high bidder, co Shepard on appraisal schedule sale, approve release of earnes	; discussions with bidders; discuss with L. Mathews ntial grant of option for solar company; get bid implete bid winner agreements (1.3); respond to G. i, notify L. Mathews on status of Abraham motion for st money for Sherwood; notify Parr Brown and DOJ of ion on closing to title company; approve publication	Asset Disposition
1	L/26/2021 WK	1.2	250.00			Litigation

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1/27/2021 WK	0.4 250.00	100.00 Respond to L. Jones on closing for Payson home; call and emails with 8Minute Energy on purchase option for land.	Asset Disposition
1/27/2021 WK	0.8 250.00	200.00 Respond to G. Shepard on Bowers debt, lien on home (.3); gather information on Evan Ayres, send to Parr Brown to file suit (.4); revise Shepard settlement agreement, send to Shepard and Bowers (.1).	Asset Recovery
1/27/2021 WK	0.3 250.00	75.00 Email L. Jones on destruction of turbine; email L. Mathews re: contact information for person with knowledge of IAS operations; request bid from T. Belchak for pallets of lenses.	Investigation
1/27/2021 WK	0.4 250.00	100.00 Deposit and log revenues; get 1099s; review and pay utility bill and publication invoice; calls to get W-9s.	Financial analysis
1/27/2021 WK	0.8 250.00	200.00 Review suggested changes to status report by DOJ and M. Lehr; send for filing.	Status Report
1/27/2021 WK	1.1 250.00	275.00 Review draft reply re: Receiver MSJ on Brennan; create redline, approve for filing (.5); call with DOJ (.6).	Litigation
1/28/2021 WK	2.6 250.00	650.00 Review title report for Sherwood home and lists of actions required by title company, respond (.2); call with 8Minute Energy on land, notice of call (.4); send information on Sherwood property to title company; email 8Minute Energy on 1,120 acres; call with potential bidder (1.0); call with L. Jones on Payson home furniture, destruction of turbine; notes of call (.2); create auction bid agreement, send to bidder; create destruction certificate for turbine and bill of sale for container, send to L. Jones (.8).	Asset Disposition
1/28/2021 WK	1.6 250.00	400.00 Review files, begin drafting motion for release of real estate funds held in reserve (1.3); call with J. Balls on payment from Shane Luke, type of lien notice for Shepard home; notes of call (.3).	Asset Recovery
1/28/2021 WK	0.2 250.00	50.00 Get filed status report, send for web posting; send information to update property sale information on website.	Case Administration
1/28/2021 WK	0.5 250.00	125.00 Get information on former employee, send to agency (.3); send directions to J. Balls on how to respond to settlement offer by R. Hamblin re: contempt action (.2).	Investigation
1/28/2021 WK	0.4 250.00	100.00 Gather tax information on 3 more vendors, send to BRG to issue 1099s.	Tax Preparation
1/28/2021 WK	1.1 250.00	275.00 Emails with D. Castleberry on deposition of Receiver and Heideman; respond to J. Balls on Jeron Johnson settlement status (.2); call with M. Lehr on fact discovery deadline for NSDP; deadlines for waiver of legal privilege, status of other tasks (.7); emails with DOJ on turbine, Shepard, patents (.2).	Litigation

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1/29/2021 WK	1.0 250.00	250.00 Get filed motion to sell California condo, send to broker with discussion whether to lease unit; revise property tracking log (.2); call with DPI Land on property purchase option (.4); gather appraisal information on HD 4805, send to DPI Land (.4).	Asset Disposition
1/29/2021 WK	1.8 250.00	450.00 Call with G. Shepard on language of settlement agreement, discuss changes; call with S. Bowers, make changes to settlement, send new version with comments (.9); work on motion for release of real estate reserve funds (.4); calls and emails with G. Shepard on language of settlement agreement (.2); revise motion for approval of settlements (.3).	Asset Recovery
1/29/2021 WK	0.6 0.00	0.00 Copy stock certificates, add cancellation notice, send to T. Belchak with auction notices. (Time not billed.)	Case Administration
1/29/2021 WK	0.1 250.00	25.00 Review invoices, reimburse Sherwood stalking horse bidder for appraisal and inspection costs.	Financial analysis
1/29/2021 WK	1.2 250.00	300.00 Read draft acknowledgement of lien for Shepard home, respond to J. Balls (.1); read S. Paul settlement proposal for R. Hamblin, respond to J. Balls; draft stipulation for Hamblin; draft stipulation for P. Olsen, send with comments; send notice of property lien to G. Shepard with comments (.8); call with M. Lehr on settlement with Olsen for OSC; read signed Olsen stipulation, respond to M. Lehr (.3).	Litigation
1/30/2021 JS	0.3 120.00	36.00 Add new real estate sales information to website notice.	Case Administration
2/1/2021 WK	0.5 250.00	125.00 Respond to California broker on closing date for sale; pay utility bills (.2); review application for zoning change in Hinckley, evaluate for change in potential value (.1); call with R. Greathouse on various property sales, prices, closing deadlines, equipment, cyanide (.2).	Asset Disposition
2/1/2021 WK	0.1 250.00	25.00 Revise Shepard acknowledgement of lien, send to Shepard.	Asset Recovery
2/1/2021 WK	0.2 250.00	50.00 Reconcile bank statements.	Financial analysis
2/1/2021 WK	3.5 250.00	875.00 Read Glenda Johnson opposition to Receiver's OSC on liens; review files; prepare reply, finish draft; send to M. Lehr.	Litigation
2/2/2021 WK	0.9 250.00	225.00 Read email from broker on Abraham buyer, missing propane tank; check PACER for status of motion (.2); email DPI Land on its interest in 1,120 acres (.1); review, sign closing documents for Sherwood Shores, call with title company on changes to closing documents (.6).	Asset Disposition
2/2/2021 WK	0.1 250.00	25.00 Review, pay bills for Payson home, Sherwood Shores.	Financial analysis

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2/2/2021 WK	3.8 250.00	950.00 Review email from J. Balls on Plaskolite discovery requests; search files to identify documents identified in Receiver discovery response; email Lone Peak on FTP site for financial analysis; search for responsive documents (2.9); call with Monty Hamilton, check court docket for status of litigation, email Parr Brown (.2); call with M. Lehr on contact information for various commission recipients, search files; respond on defaults (.7).	Litigation
2/3/2021 WK	2.3 250.00	575.00 Review, pay invoices for Payson home, pay Payson condo HOA dues; respond to Payson home broker on interest in bidding (.8); notify L. Mathews of no new bid for 4805; respond to G. Shepard on reasons court order needs to be recorded with notice of interest; read Shepard appraisal #1, send copy to Shepard; review 8Minute letter of intent, send to DOJ with comments (1.4); send copies of orders on Sherwood, 4805 to title company (.1).	Asset Disposition
2/3/2021 WK	3.2 250.00	800.00 Draft settlement agreement for M. Hamilton; review files, send to Hamilton; revise motion to approve settlements (1.6); work drafting motion for release of Glenda funds reserved for Oasis warehouse (1.5); review settlement offer by Zeigler, send directions to M. Lehr (.1).	Asset Recovery
2/3/2021 WK	0.7 0.00	0.00 Go to Wells Fargo, wire funds for closing on Sherwood Shores property. (Time not billed.)	Financial analysis
2/3/2021 WK	2.4 250.00	600.00 Meet with Monty Hamilton to review documents, discuss settlement (1.5); review draft summary judgment reply for Skaggs, respond to J. Balls; send redline with comments (.4); review M. Lehr revisions to reply on Receiver's OSC against Glenda Johnson for liens (.5).	Litigation
2/4/2021 WK	0.3 250.00	75.00 Research dates of offer for Abraham home; check PACER to see of sale order was entered; respond to L. Mathews on delay not being as long as buyers complained, explain timetable for closing sale.	Asset Disposition
2/4/2021 WK	1.3 250.00	325.00 Revise draft motion for release of funds reserved for Glenda Johnson, send to M. Lehr for work (.8); meet with Monty Hamilton, sign settlement agreement, create receipt; send to M. Lehr with directions to file motion for approval of settlements, update tracking logs (.5).	Asset Recovery
2/4/2021 WK	1.2 0.00	0.00 Drive to Shepard home, pick up signed lien notice. (Time not billed).	Asset Recovery
2/4/2021 WK	0.1 250.00	25.00 Call with R. Greathouse on hazardous materials.	Investigation
2/4/2021 WK	0.6 250.00	150.00 Work gathering discovery responses for Plaskolite; finish sending final responsive documents and explanation.	Litigation

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2/5/2021 WK	1.8 250.00	450.00 Call with Juab Title and lender on timeline for closing on Abraham property (.1); get order approving Abraham sale, set auction date, notify broker, send publication notice to Chronicle Progress; draft and send letter to lender for Abraham buyer explaining role of receiver and approval process (.8); get order approving sale and publication for California; send publication notice to newspaper, notify broker; pay bills for contractor, utilities (.9).	Asset Disposition
2/6/2021 WK	0.3 250.00	75.00 Call with T. Belchak on items stolen from his property, his interest in other properties; call with fire marshal on hazardous materials in trailer on Topaz property.	Investigation
2/8/2021 WK	1.7 250.00	425.00 Call with T. Belchak on auction for 80 acres, identity of buyer of 1,120 acres, theft of wire, Abraham home, vehicles (.3); read offer for Topaz property, respond to broker (.2); draft notice of property sale results for Sherwood property; prepare summary of expenditures; revise notice of sale results (1.2).	Asset Disposition
2/8/2021 WK	0.2 250.00	50.00 Review DMV responses on titles; send payments for 5 titles; notify Sahara motors.	Asset Recovery
2/8/2021 WK	1.2 250.00	300.00 Pay invoices for Payson home, Abraham propane; review electric bills for Abraham, send Abraham bills to NSDP with explanation they are for period before title was transferred to Receiver; respond to Millard County on rollback for HD3511; get 1099 notices; research 1099 sent from insurance company; pay publication expense for 4805, utility bills; log settlement payments (1.0).	Financial analysis
2/9/2021 WK	1.1 250.00	275.00 Respond to J. Balls on status of Payson home and Payson condo; revise notice of sale results for Sherwood, send to Parr Brown with publication affidavit (.2); participate in court hearing (.3); email Provo Daily Herald on affidavits of publication; call with Millard fire chief, notes of call (.2); get affidavits of publication, send to J. Balls; respond to L. Jones on process for closing, transfer of water rights (.2); review, sign addendum for Abraham home, send comments to broker (.1); get filed affidavit of publication, respond to broker on Payson condo (.1).	Asset Disposition
2/9/2021 WK 2/9/2021 WK	0.2 250.00 0.5 0.00	50.00 Revise settlement agreement for Mahler, send to J. Balls with comments. 0.00 we have relevant documents; begin list of deposition questions for NSDP; gather documents for deposition; create list of payments to trust account from stock sales. (Time not billed.)	Asset Recovery Investigation
2/9/2021 WK	0.2 250.00	50.00 Log settlement payments; review status of settlement payments owed; email delinquent defendants.	Financial analysis

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2/10/2021 WK	1.3 250.00	325.00 Respond to DOJ on 8Minute Letter of Intent; respond to L. Jones on timing for closing of Payson home; check PACER (.2); revise LOA, send to 8Minute Energy (.6); emails with L. Jones on signing closing documents (.1); respond to L. Mathews on offer for 3511-1 and putting listings on hold (.4).	Asset Disposition
2/10/2021 WK	1.6 250.00	400.00 Review account statements for LaGrand & Randale Johnson, update analysis charts; respond to S. Paul (.2); revise list of NSDP stock sales (from box 19) (1.4).	Investigation
2/10/2021 WK	2.0 0.00	0.00 Index documents in NSDP Box 19. (Time not billed.)	Investigation
2/10/2021 WK	0.5 250.00	125.00 Download, read notice of appeal by Neldon Johnson; call with DOJ.	Litigation
2/11/2021 WK	2.6 250.00	650.00 Call with L. Jones on Payson closing, signing closing documents, deadline for 1031 closing; check PACER, get orders; send to brokers; update tracking log; send information to property bidders on California condo, Abraham home; send appraisal to bidder (.8); read, sign documents for Payson home (.1); review, sign closing documents for Payson condo; calls with title company on changes needed; review and sign corrected documents (.7); review, sign closing documents for Payson home, respond to title company (.6); send information to title company on purchaser of 67.5 acres, call with R. Greathouse on vehicles on Abraham property (.4).	Asset Disposition
2/11/2021 WK	0.5 0.00	0.00 Get certified copies of orders approving sales of Payson home, Payson condo. (Time not billed.)	Asset Disposition
2/11/2021 WK	2.2 250.00	550.00 Read draft summary judgment motion on Hamblin, sign declaration, send for filing (.7); get signed settlement agreement for Mahler; revise motion to approve settlements, send for filing; revise settlement log; research PACER, update litigation tracking log (1.5).	Asset Recovery
2/11/2021 JS	0.3 120.00	36.00 Add four property sales to website.	Asset Disposition
2/12/2021 WK	0.9 250.00	225.00 Send copies of appraisals to potential bidder, send information to Payson condo title company on title defect (.4); call with DPI Land on language for LOI; read, sign, and send LOI and financial documents (.5).	Asset Disposition
2/12/2021 WK	2.1 250.00	525.00 Compile list showing status of settlements; research whether Receiver has statute of limitation waivers, send to J. Balls with comments (1.5); court hearing on status of litigation (.4); call with M. Lehr on settlement with J. Freeborne (.2).	Asset Recovery
2/12/2021 WK	0.2 250.00	50.00 Read DMV letter on value of trailer, send to Sahara Motors with inquiry; pay publication cost for two Payson properties.	Financial analysis
2/12/2021 WK	2.3 250.00	575.00 Work on special report of status of litigation matters, finish first draft; revise litigation tracking log; send draft report to DOJ, J. Balls.	Status Report

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2/12/2021 WK	0.1 250.00	25.00 Read letter from D. Reay objecting to in-person deposition, send comments to D. Castleberry.	Litigation
2/15/2021 WK	3.3 250.00	825.00 Verify receipt of proceeds from sale of Payson home; review property information on 80 acres, send information to T. Belchak on buyer; emails with L. Mathews on removing 3 properties from MLS (.3); gather information on expenses paid on Payson home, prepare notice of property sale results (.1.4); review draft deeds for Patel purchase of 1,120 acres, call title company, send markup of deeds with comments (.5); draft motion to sell 3 parcels to 8Minute Energy (.7); review documents for sale of 67.5 acre parcel; research water rights, respond to title company on errors in legal description in order approving sale (.3); review revised deed for 1,120 acres, sign closing documents (.1).	
2/15/2021 WK	1.7 250.00	425.00 Analyze sources of funds for receivership, send to DOJ for discussion of what information they would like in allocating receipts (and costs/fees).	Financial analysis
2/15/2021 WK	1.3 250.00	325.00 Read magistrate report and recommendation on Glenda Johnson lawsuit against IRS; read Glenda objection, send comments to DOJ and Parr Brown (1.2); read DOJ comments on litigation status report (.1).	Litigation
2/16/2021 WK	3.7 250.00	925.00 Get Receiver deed for 4805 notarized, respond to Juab Title on errors in legal description for Abraham properties (.2); draft motion for corrected orders approving sales of Abraham properties, send to Parr Brown for review and filing; texts to T. Belchak on water rights (2.2); notify L. Mathews of auction on Feb. 25; work drafting motion to sell properties to 8Minute Energy (.9); calls with listing broker for Payson condo on closing, cancel insurance and utilities for Payson home and condo (.4).	Asset Disposition
2/16/2021 WK	0.2 250.00	50.00 Call with Steven Bowers on status of payment, send update to Parr Brown; call with R. Greathouse on vehicles on Abraham properties.	Asset Recovery
2/16/2021 WK	1.1 250.00	275.00 Create list of questions to ask in Heideman deposition, send to D. Castleberry with comments (1.0); read docket text order on OSC against Glenda Johnson, Olsen, Hamblin (.1)	Litigation
2/17/2021 WK	5.4 250.00	1,350.00 Work on motion for sale of properties to 8Minute Energy; prepare proposed order and auction procedures, send to Parr Brown with comments (4.6); gather information on financial transactions, prepare notice of sale results for Payson condo; send to Parr Brown for review (.8).	Asset Disposition
2/17/2021 WK	0.2 250.00	50.00 Read order approving settlements, send to Church of Jesus Christ requesting payment, update tracking log, respond to M. Lehr on further actions.	Asset Recovery

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2/17/2021 WK	1.0 250.00	250.00 Read district court order in Glenda v. IRS case, comments to DOJ (.2); call with D. Castleberry about Reay deposition, Orth documents; search files for copies of Orth and Gregg purchase agreements, respond to D. Castleberry (.6); review and sign discovery responses to Heideman (.2).	Litigation I
2/18/2021 WK	1.0 250.00	250.00 Record additional NSDP sales of IAS stock found in NSDP Box 19.	Investigation
2/18/2021 WK	4.7 250.00	1,175.00 Deposition of Justin Heideman.	Litigation
2/18/2021 WK	2.0 0.00	0.00 Travel to Provo for deposition of Heideman. (Time not billed.)	Litigation
2/19/2021 WK	2.6 250.00	650.00 Call with DOJ on search for additional assets; research on asset recovery (.4); work drafting proposed findings and order re: property liens (2.2).	Asset Recovery
2/19/2021 WK	0.5 250.00	125.00 Read prior order from Utah Division of Securities re: Steve Bowers, research Bowers entities, review terms of Shepard settlement agreement.	Investigation
2/19/2021 WK	1.8 0.00	0.00 Attempt to get cashier's check for DOJ (effort failed due to the size of the check and no available supervisor); second trip to bank to get cashiers' checks. (Time not billed.)	Financial analysis
2/19/2021 WK	0.2 250.00	50.00 Get 2 affidavits of publication, send for filing; pay invoices for publication; record settlement payment.	Financial analysis
2/22/2021 WK	0.2 250.00	50.00 Review files, respond to Sherwood buyer on home warranty (.1); review M. Lehr changes to motion for corrected sale orders for Abraham properties, approve filing motion (.1).	Asset Disposition
2/22/2021 WK	1.0 250.00	250.00 Review new appraisal for Shepard home; create calculation for expected net profits, using formula from settlement agreement, send to Shepard for review.	Asset Recovery
2/22/2021 WK	6.3 250.00	1,575.00 Deposition of Receiver by Justin Heideman; discussions of strategy with D. Castleberry (3.3); research files, email records; gather and send to D. Castleberry with comments (1.6); emails with LPV on expert opinion needed for Heideman litigation (.7); call with D. Castleberry on whether to send internal notes to Heideman, applicable privileges (.2); begin reading Ina Newman opposition to Receiver summary judgment, make notes for reply (.5).	Litigation
2/23/2021 WK	1.2 250.00	300.00 Participate in Zoom court hearing on sale of California condo (.2); read email from DOJ authorizing disposition of patents, send request and information to Parr Brown to put patents in public domain (.6); create bidding forms for auction of 80 acres (.4).	Asset Disposition
2/23/2021 JS	0.7 120.00	84.00 Work preparing 2020 financial reports (P&L, B/S)	Tax Preparation

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2/23/2021 WK	0.3 250.00	75.00 Review notice of water right transfer, verify accuracy from property records; review report from Sahara Motors on condition of LB Smith trailer, send to DMV with explanation; update tracking log; notify Sahara of action.	Asset Recovery
2/23/2021 WK	0.1 250.00	25.00 Log settlement payments and refunds.	Financial analysis
2/23/2021 WK	0.5 250.00	125.00 Respond to D. Castleberry on whether to assert privilege on Receiver's call notes (.2); work reviewing Ina Newman opposition to MSJ (.2); call with M. Longson on documents and flash drives to produce to Heideman.	Litigation
2/24/2021 WK	0.2 250.00	50.00 Read, sign agreement with Shepard on value of equity in his home; get filed motion to correct sale orders for Abraham properties; get order approving sale of California condo, send to broker.	Asset Disposition
2/24/2021 WK	1.5 250.00	375.00 Work preparing findings and proposed order for contempt re: lien filings.	Investigation
2/24/2021 WK	0.6 0.00	0.00 Review Parr Brown fee invoices, review fee application; create redline, send to M. Lehr. (Time not billed.)	Financial analysis
2/24/2021 WK	0.1 250.00	25.00 Review and pay invoice for Sherwood home warranty.	Financial analysis
2/24/2021 WK	4.1 250.00	1,025.00 Finish reading Ina Newman opposition to MSJ, make list of topics to discuss with M. Lehr (1.5); call with DOJ (.7); find and send information to DOJ; research dates of birth (.3); call with D. Castleberry on privilege; prepare draft email to Heideman (.8); call with Lone Peak Valuation on Heideman forensic expert, discuss information LPV already has and wants (.1); work on draft email to Heideman (.4); send information to Lone Peak on solvency of RaPower, computer password, lens lease information (.3).	Litigation
2/25/2021 WK	4.4 0.00	0.00 Travel to Fillmore for auction of 80 acres; return. (Time not billed.)	Asset Disposition
2/25/2021 WK	2.4 250.00	600.00 Auction of 80 acres; discussion with T. Belchak on other properties available for sale (1.4); record deposits from Belchak, calculate deposited amounts, send information to Juab Title on closing (.6); gather and send information to T. Belchak on Oasis water sources; email J. Balls on offer for Plaskolite lenses (.4).	Asset Disposition

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2/25/2021 WK	3.1 250.00	775.00 Call with Lone Peak Valuation on request for Shepard deposition, documents needed for forensic accounting report (.1); meeting with M. Lehr to discuss reply to Ina Newman summary judgment opposition (1.3); review J. Balls update to litigation special report; review files to identify status of settlement payments, insert payment information in report, send to J. Balls with comments (1.0); revise Receiver's litigation tracking log with new information from litigation special report (.3); read court order granting summary judgment on T. Shepherd, court's findings of fact (.4).	Litigation
2/26/2021 WK	3.8 250.00	950.00 Send information to Parr Brown on report on 8th settlement status (.2); search depositions and box indexes to references to lens refunds, send to Lone Peak Valuation; review background information on Ayres (.9); work on proposed findings and order on property liens (2.7).	Investigation
2/26/2021 WK	0.2 250.00	50.00 Pay utility bills; texts with T. Belchak on missing bid deposits.	Financial analysis
2/26/2021 WK	0.5 250.00	125.00 Get copies of depositions from DOJ, send to Lone Peak with comments about solvency; send court solvency findings on T. Shepherd summary judgment and solvency to Lone Peak and D. Castleberry (.2); emails with D. Castleberry on documents wanted to Heideman, send inquiry to M. Lehr (.3).	Litigation
2/27/2021 WK	0.1 250.00	25.00 Emails with Juab Title on closing for Patel, read title report for 80 acre parcel.	Asset Disposition
2/27/2021 WK	2.8 250.00	700.00 Work preparing findings and proposed order for contempt re: lien filings.	Investigation
2/27/2021 JS	1.0 120.00	120.00 Work preparing 2020 financial reports (P&L, B/S)	Tax Preparation
3/1/2021 WK	0.4 250.00	100.00 Email 8Minute Energy on status of LOI, sign new deed for Patel, pay utility bills; call with R. Greathouse on Abraham property closing and vehicles.	Asset Disposition
3/1/2021 WK	1.5 250.00	375.00 Review information on new business being promoted by G. Shepard (.1); work preparing findings and proposed order for contempt on lien filings.	Investigation
3/1/2021 WK	5.1 250.00	1,275.00 Read draft discovery requests to NSDP (.6); call with DOJ on Plaskolite defense; get filed litigation status report; send suggested strategy to D. Castleberry on responding to Heideman request for Receiver's internal notes; respond to J. Balls on strategy for summary judgment for NSDP (.9); work on redline of response to NSDP discovery request, search for documents in files (2.4); call with Lone Peak on contents of insolvency report; send SJ rulings and information on badges of fraud (1.0); call with D. Castleberry on Heideman discovery responses and D. Reay (.2).	Litigation

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3/2/2021 WK	0.4 250.00	100.00 Reconcile bank statements.	Financial analysis
3/2/2021 WK	6.7 250.00	1,675.00 Read revised discovery requests to send to NSDP, respond to M. Lehr (.3); deposition of D. Reay; discussions with D. Castleberry on litigation strategy (6.4).	Litigation
3/2/2021 JS	1.5 120.00	180.00 Work preparing 2020 financial reports (P&L, B/S)	Tax Preparation
3/3/2021 WK	0.4 250.00	100.00 Review new vehicle titles from DMV, sign and send to Sahara Motors; update vehicle tracking log.	Asset Recovery
3/3/2021 WK	1.2 250.00	300.00 Work preparing findings and proposed order for contempt re: lien filings.	Investigation
3/3/2021 WK	1.3 250.00	325.00 Send accounting information to J. Shupe; research receipts for AMEX reimbursements, send receipts and breakdown to J. Shupe.	Tax Preparation
3/3/2021 WK	0.5 250.00	125.00 Pay invoices, record settlement payments and insurance refunds; call to cancel propane service to Abraham home.	Financial analysis
3/3/2021 WK	1.2 250.00	300.00 Read status report on 8th settlement motion; read order on quarterly litigation report requested by Court; make notes of Heideman discovery requests (.2); review draft MSJ for Kontos, find 1099 forms, revise and sign, approve filing, update litigation log (.5); review draft MSJ for Aulds, revise declaration, sign and send for filing (.4); review Heideman offer of judgment, respond to D. Castleberry with directions (.1)	-
3/4/2021 WK	0.5 250.00	125.00 Call with T. Belchak on ownership of belly dump trailer; respond to Evan Ayres on complaint served on him.	Asset Recovery
3/4/2021 WK	7.9 250.00	1,975.00 Finish first draft of proposed findings and order on lien contempt, revise and edit; send to Parr Brown and DOJ with request for comments.	d Investigation
3/4/2021 WK	1.6 250.00	400.00 Read transcript of Heideman deposition of Receiver, send completed certification and errata sheet to court reporter (1.4); get copy of Heideman deposition; call with M. Lehr on status of reply on Newman MSJ (.2).	Litigation
3/4/2021 JS	1.5 120.00	180.00 Work preparing 2020 financial reports (P&L, B/S)	Tax Preparation
3/5/2021 WK	0.1 250.00	25.00 Call with broker for buyer of Abraham home about auction.	Asset Disposition
3/5/2021 WK	0.3 250.00	75.00 Respond to questions by J. Shupe on 2020 accounting, to prepare financial statements	. Tax Preparation

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3/5/2021 WK	3.6 250.00	900.00 Read draft reply to Receiver's MSJ against Ina Newman; create redline, send to M. Lehr with comments (2.2); read information from D. Castleberry on expected Heideman and Reay efforts to claw back production of privileged documents, send lengthy analysis of effects and recommended strategy in response (1.4).	Litigation
3/6/2021 JS	1.8 120.00	216.00 Work preparing 2020 financial reports (P&L, B/S)	Tax Preparation
3/8/2021 WK	0.6 250.00	150.00 Respond to broker for buyer of Abraham home about auction location, auction process (.1); prepare auction bid log, auction agreement, agreement for winning bid for Abraham home, send auction agreement to L. Mathews with comments that new bidders are allowed (.5).	Asset Disposition
3/8/2021 WK	0.8 250.00	200.00 Respond to Ayres on reason lawsuit was filed against him, why his prior settlement was void; review settlement offer from Aulds, review files and prior offers, send settlement authority to J. Balls (.6); call with Lone Peak Valuation on why payments to Heideman Aare not being sought; email M. Lehr on lien findings, fee recovery; deliver flash drives to Manning Curtis (.2)	Asset Recovery
3/8/2021 WK	0.2 250.00	50.00 Review monthly bank statements from LaGrand Johnson, update tracking log; send confirmation.	Investigation
3/8/2021 WK	0.6 250.00	150.00 Review draft 2020 financial statements for Receivership, send comments to J. Shupe.	Tax Preparation
3/8/2021 WK	2.4 250.00	600.00 Read draft findings and conclusions for submission in Trudy Shepherd summary judgment; send to J. Balls with comments.	Litigation
3/9/2021 WK	0.5 250.00	125.00 Prepare notice of sale results for sale of 1,120 acres, send for filing.	Asset Disposition
3/9/2021 WK	0.2 250.00	50.00 Read update on Olsen tax court status; get transcript of Reay deposition; review statements for bank and investment accounts for Randale Johnson.	Investigation
3/9/2021 WK	0.4 250.00	100.00 Review and pay bills; record deposits.	Financial analysis
3/9/2021 WK	0.9 250.00	225.00 Search files, send information to Lone Peak on trial timeline, financial transactions after entry of freeze orders, other badges of fraud.	Litigation
3/10/2021 WK	0.2 250.00	50.00 Call with T. Belchak on whether buyer agents will receive commissions on sales; call with R. Greathouse on Abraham auction, deadline for moving vehicles.	Asset Disposition
3/10/2021 WK	0.3 250.00	75.00 Review draft MSJ for Armand, review and sign declaration; update logs; review boxes to find form 1099s, send to J. Balls with approval to file; emails with J. Balls on Aulds settlement offer.	Asset Recovery

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3/10/2021 WK	0.1	250.00	25.00 Review and pay invoices for depositions.	Financial analysis
3/10/2021 WK	0.5	250.00	125.00 Call with DOJ.	Litigation
3/10/2021 JS	0.4	120.00	48.00 Finish compiling 2020 financial statements tax returns, send to Receiver for use in tax preparation.	Tax Preparation
3/11/2021 WK	4.3	0.00	0.00 Travel to and from Fillmore for auction of Abraham home. (Time not billed.)	Asset Disposition
3/11/2021 WK	1.6	250.00	400.00 Auction of Abraham home; discussions with buyer, broker, other bidders, county assessor; discuss other properties (1.3); send information to Juab Title on closings for Abraham home, 80 acres; email M. Lehr on getting corrected sale orders (.3).	Asset Disposition
3/11/2021 WK	0.2	250.00	50.00 Review J. Shupe financial summary for 2020 transactions, send to BRG with 1099 notices received, to prepare taxes.	Financial analysis
3/12/2021 WK	0.4	250.00	100.00 Calls with T. Belchak on Oasis, desire for survey (.2); review, sign Receiver deed for Abraham home, send to title company (.1); review water right addendum for Abraham home, compare with records in file, sign and send (.1).	Asset Disposition
3/12/2021 WK	0.4	0.00	0.00 Get deed signature notarized, send to title company. (Time not billed.)	Asset Disposition
3/12/2021 WK	0.2	250.00	50.00 Emails with R. Blackburn on settlements, respond to J. Balls on settlement offers from Aulds and Reay.	Asset Recovery
3/12/2021 WK	3.2	250.00	800.00 Review M. Lehr changes to proposed order on contempt for improper liens; research Olsen Tax Court docket; review files for dates of prior knowledge; insert cross references to findings; send to M. Lehr.	Investigation
3/15/2021 WK	0.9	250.00	225.00 Read email from California broker on status of closing, send inquiry to J. Balls (.3); review files, email 8Minute Energy on status (.1); call with Abraham buyer (.2); email L. Mathews on Oasis buyer, request for a survey (.3).	Asset Disposition
3/15/2021 WK	0.6	250.00	150.00 Draft settlement agreement for Chase Bank, send to J. Balls with comments.	Asset Recovery
3/15/2021 WK	0.6	250.00	150.00 Record deposits, update settlement log; get utility refunds, pay rollback taxes; direct Parr Brown to dismiss Ayres suit; pay DMV for titles.	Financial analysis
3/15/2021 WK	0.9	250.00	225.00 Check PACER updates; read emails with Court on summary judgment motions; emails with DOJ and M. Lehr on proposed findings for improper liens; read Ina Newman response to Receiver objection on exhibits in Receiver's MSJ (.4); draft letter to Plaskolite on disposition of lenses (.5).	Litigation

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3/16/2021 WK	0.5 250.00	125.00 Get order approving corrected sale orders for two Abraham properties, send to title company; notify buyer of Abraham home; get signed letter of intent for 8Minute Energy, send to M. Lehr, respond to DPI Land (.4); download corrected sale order on 4606-2, send to Juab Title (.1)	Asset Disposition
3/16/2021 WK	2.3 250.00	575.00 Review settlement offer by Bell, review file, draft settlement agreement, send to J. Balls with comments (.8); draft settlement agreement for Aulds, calculate commission payments after time of DOJ suit, review files, finalize settlement agreement and send with comments (1.5).	Asset Recovery
3/16/2021 WK	3.1 250.00	775.00 Review new draft findings for findings on improper liens, send to M. Lehr with comments (.5); review new document production from Heideman (2.6).	Litigation
3/17/2021 WK	1.3 250.00	325.00 Get copy of corrected order on Abraham home, send to title company and buyer (.2); review offer on Oasis warehouse; emails with agent; send list of items for inclusion in counteroffer (.2); sign purchase agreement; draft and send motion for sale of home (.4); respond to buyer of Abraham home on court orders; emails with title company on deposit; review and sign closing documents (.5).	Asset Disposition
3/17/2021 WK	0.7 0.00	0.00 Get certified copies of order approving sale of Abraham home, send for overnight delivery. (Time not billed.)	Asset Disposition
3/17/2021 WK	0.3 250.00	75.00 Search for contact information for M. Hamilton; respond to M. Lehr on settlement terms for Chaston.	Asset Recovery
3/17/2021 WK	1.6 250.00	400.00 Finish review of additional documents produced by Heideman, select documents to discuss; send to D. Castleberry with comments.	Litigation
3/18/2021 WK	2.3 250.00	575.00 Communications with T. Belchak on making offer for Oasis, status of Plaskolite plastic (.1); draft motion to approve sale of Oasis and sale of lenses; call with DOJ on sale; draft auction procedures and proposed orders; send to Parr Brown (2.2).	Asset Disposition
3/18/2021 WK	2.7 250.00	675.00 Emails with M. Lehr on Chaston settlement offer, draft and send settlement agreement; approve changes to settlement agreement with Chase Bank, sign and send to Parr Brown (.6); call with M. Lehr and J. Balls on settlement terms for defendants where summary judgments were filed (.2); review file, draft settlement agreement for Kelvin Smith (.5); prepare motion to approve settlements, send to Parr Brown with comments; send to DOJ requesting approval of settlement terms (1.4).	Asset Recovery
3/19/2021 WK	0.9 250.00	225.00 Review files, work drafting notice of sale results for Abraham home.	Asset Disposition

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3/19/2021 WK	0.3 250.00	75.00 Call and emails with Mark Shurtleff on extra time for Lynette Williams to make payment; emails with Juab Title on closing for 80 acre parcel, 675 acre parcel; call witl California escrow company on closing; emails with broker.	Asset Recovery
3/22/2021 WK	1.5 250.00	375.00 Finish notice of sale results for Abraham home, send for filing; cancel insurance on home (.3); review and sign closing documents for California condo, verify commission amount; research evidence of payments made to HOA and property taxes; email escrow company on errors (1.1); review and sign revised closing statement, send inquiry to escrow company on other documents needed (.1).	Asset Disposition
3/22/2021 WK	0.5 250.00	125.00 Review settlement offer by Kinsey and SunCore; review file; send directions to J. Balls on what settlement terms to offer.	Asset Recovery
3/22/2021 WK	0.2 0.00	0.00 Read information from third party about case, send correcting information. [Time not billed.]	Investigation
3/22/2021 WK	0.2 250.00	50.00 Receive, record, and deposit settlement payments; pay publication invoice; update settlement log.	Financial analysis
3/22/2021 WK	0.4 0.00	0.00 Make bank deposit, get notarization of deeds, deliver overnight mail package. [Time not billed.]	Financial analysis
3/22/2021 WK	2.4 250.00	600.00 Read draft expert report by Lone Peak Valuation showing insolvency of RaPower, send to D. Castleberry with comments (1.7); respond to M. Lehr on offer of judgment for Jameson (.2); call with D. Castleberry on draft Lone Peak report; read D. Castleberry comments and requested edits to expert report, send to Lone Peak with comments (.5).	d Litigation
3/23/2021 WK	0.3 250.00	75.00 Review M. Lehr changes to motion to sell property to 8Minute Energy, send comments, approve filing (.2); call with T. Belchak on closing on 80 acre and 67.5 acre parcels; update property log (.1).	Asset Disposition
3/23/2021 WK	0.2 250.00	50.00 Get filed ninth motion to approve settlements; update tracking log; review status of settlement payments due.	Asset Recovery
3/23/2021 WK	4.8 0.00	0.00 Research billing records for time spent on lien work; research costs related to lien investigation. [Time not billed.]	Investigation
3/23/2021 WK	0.7 250.00	175.00 Reach new version of Lone Peak report; call with D. Castleberry, send comments to Lone Peak on new issues (.4); call with R. Hoffman on expected response from Heideman's expert, how to react (.3).	Litigation
3/23/2021 JS	0.2 120.00	24.00 Review inquiry from BRG on financial statements, research accounting records, respond to BRG.	Tax Preparation

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3/24/2021 WK	1.3 250.00	325.00 Review and sign closing documents for California condo; review and sign closing documents and deed for Millard County 67.5 acre parcel; calculate amounts of deposit; calculate deposits for HD 4648, email Juab Title on how to apply additional funds; call with California escrow company on court orders needed (.9); update property report with information on new sales (.1); call with T. Belchak on property closings, survey of Oasis property; send REPC for Oasis stalking horse bidder; email L. Mathews on survey (.3).	Asset Disposition
3/24/2021 WK	0.9 0.00	0.00 Get notarization of deeds; get certified copies of court orders approving sales, send to California escrow company. [Time not billed.]	Asset Disposition
3/24/2021 WK	0.2 250.00	50.00 Email Parr Brown on assistance from Zions Bank in asset recovery.	Asset Recovery
3/24/2021 WK	2.3 250.00	575.00 Review new version of Lone Peak report and analyze exhibits, send comments to D. Castleberry; call with Lone Peak (1.7); call with DOJ (.6).	Litigation
3/26/2021 WK	2.0 250.00	500.00 Call with Juab Title on closing; call with California broker on closing; compare new California closing statement with earlier version; cancel insurance (.2); record California settlement proceeds; notify 8Minute of motion to sell property (.2); research California expenditures, prepare notice of sale results; call with new solar provider on Millard properties, send copy of motion to sell and appraisal (1.6)	Asset Disposition
3/26/2021 WK	1.1 250.00	275.00 Review settlement offer by Turner; review file, draft settlement agreement, send with comments (.7); read settlement inquiry from G. Shepard; emails with DOJ; respond to Shepard (.1); review offer by Kontos, review file; respond to J. Balls (.3).	Asset Recovery
3/26/2021 WK	1.0 250.00	250.00 Respond to D. Castleberry on Reay requesting extension of discovery period; read Reay letter with claim of misrepresentation about privilege, respond to D. Castleberry.	Litigation
3/29/2021 WK	0.8 250.00	200.00 Receive 3 new titles from DMV, sign and send to Sahara; review Tax Commission requests for surety bonds, send information to Sahara (.4); draft notice of sale results for Millard 67.5 acres (.4).	Asset Disposition
3/29/2021 WK	0.1 250.00	25.00 Read order approving settlements; update tracking log; email J. Balls about notifying Chase Bank.	Asset Recovery
3/29/2021 WK	0.3 250.00	75.00 Pay bills, record settlement payments and property sales.	Financial analysis
3/29/2021 WK	0.2 250.00	50.00 Call with J. Balls and M. Lehr on strategy for NSDP discovery.	Litigation
3/30/2021 WK	0.4 250.00	100.00 Read new DMV letters on value of vehicles, send to Sahara Motors (.2); review settlement offer by Lunn, review files, respond to J. Balls (.2).	Asset Recovery
3/30/2021 WK	1.4 250.00	350.00 Create list of search terms for search terms of NSDP emails, send to M. Lehr with comments.	Litigation

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3/30/2021 WK	0.1 250.00	25.00 Review bill for water shares for Payson home, send information to water company on buyer of property.	Asset Disposition
3/31/2021 WK	0.5 250.00	125.00 Get copy of filed motion for sale of Oasis warehouse, send to broker; update property list related to status report; email title company on status of closing on 80 acres; get filed notice of sale results for California condo; call with T. Belchak on closing on 80 acres, his interest in Shepard home.	Asset Disposition
3/31/2021 WK	1.1 250.00	275.00 Call with S. Bowers on request for additional time to pay amount due on Shepard home; prepare amendment to settlement agreement, send to Shepard; notes of call.	Asset Recovery
3/31/2021 WK	0.2 250.00	50.00 Record settlement payments; transfer funds to savings; emails with title company on closings.	Financial analysis
3/31/2021 WK	0.4 250.00	100.00 Review M. Lehr comments on search terms for NSDP discovery; respond with comments and additional search terms (.3); review dates for deposition of Lone Peak expert, send request to Lone Peak, respond to D. Castleberry.	Litigation

62,017.00

289.5

Totals

EXHIBIT B-2



May 27, 2021

RaPower-3 Receivership Wayne Klein, Receiver Klein & Associates P.O. Box 1836 Salt Lake City, UT 84110 wklein@Kleinutah.com

Invoice: 894793 Client: 176390 Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration of Receivership Estate

Professional Services \$10,004.00
Total Costs Advanced \$148.36

TOTAL THIS INVOICE \$ 10,152.36







Invoice: 894793 May 27, 2021
RaPower-3 Receivership Client: 176390
Administration of Receivership Estate Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/07/21	SD	Research at Utah Water Rights Division to identify, coordinate and summarize new uploaded information for water users into working files	.10	15.00
1/08/21	MSL	Communications with potential bidders for upcoming property auctions; Review auction procedures re same	.60	132.00
1/08/21	MSL	Correspond with Jeff Balls re service of report and recommendation and motion for order to show cause upon Olsen and Hamblin; Correspond with Preston Olsen re acceptance of service; Compile documents to be served; Review order taking motion for order to show cause under advisement	.90	198.00
1/11/21	MSL	Telephone communication and email correspondence with bidder on Shorewood property	.40	88.00
1/12/21	MSL	Communication re potential qualified bidder for Sherwood property	.20	44.00
1/14/21	MSL	Telephone communication with potential bidder on Millard county property; Follow up email to bidder re current and future auctions on property in Millard County; Email communication with another bidder re auctions; Communication with Wayne Klein re deposit from bidder	.90	198.00
1/15/21	MSL	Correspondence re auctions of Millard County property	.20	44.00
1/27/21	MSL	Review and revise ninth quarterly status report; Review records and filings related to receivership re same; Communication with Wayne Klein re same	1.70	374.00
1/28/21	MSL	Review revisions to status report by Receiver; Incorporate changes and coordinate filing re same	.50	110.00
1/28/21	AB	Conference with Jeffery Balls re revised deed; Review Los Angeles County recording fees; Letter to Los Angeles County Recorder enclosing revised Newhall deed for recording	.10	15.00
1/29/21	MSL	Communication with Wayne Klein re stipulations of Roger Hamblin and Preston Olsen; Review and revise Olsen stipulation; Communication with Olsen re stipulation; Draft Receiver's notice of stipulation re Hamblin and Olsen stipulation; Coordinate filing re stipulations	2.60	572.00
1/30/21	MSL	Review Glenda Johnson's response to motion for order to show cause; Communication with Wayne Klein re same	.30	66.00
2/01/21	MSL	Review draft reply to motion for order to show cause; Communication with Wayne Klein re same	.20	44.00
2/02/21	MSL	Draft reply in support of motion for order to show cause; Review report and recommendation and motion re same; Research defenses to civil contempt including advice of counsel and impossibility; Research re contempt sanctions; Communication with Wayne Klein re same	5.40	1,188.00
2/03/21	MSL	Draft and revise reply in support of motion of order to show cause including section re remedy; Research re remedy in civil contempt context; Communication with Wayne Klein re same	2.90	638.00
2/04/21	MSL	Incorporate changes to reply in support of motion for order to show cause; Finalize reply and citations; Coordinate filing of reply	1.10	242.00

Invoice: 894793 May 27, 2021
RaPower-3 Receivership Client: 176390
Administration of Receivership Estate Matter: 1

Date	Tkpr	Description	Hours	Amount
2/10/21	MSL	Review and revise notice of sale results; Coordinate filings re same	.50	110.00
2/12/21	JOH	Attend to potential settlement; Review email correspondence re various matters	.10	37.00
2/12/21	MSL	Review and revise eighth settlement motion; Draft proposed order re same; Coordinate filing re same	.70	154.00
2/16/21	MSL	Review order re contempt of Glenda Johnson, Preston Olsen, and Roger Hamblin; Communication with Wayne Klein re order and order re eighth settlement motion; Review communication re motion to correct order	.50	110.00
2/17/21	MSL	Review correspondence with Wayne Klein motion to approve property sale and a solar companies letter of intent	.20	44.00
2/18/21	SD	Research at Utah Water Rights Division to identify, coordinate and summarize new uploaded information for water users into working files	.10	15.00
2/22/21	MSL	Review communication from DOJ re Glenda Johnson's continued contempt of Receivership order; Review report and recommendation and opposition to report and recommendation in Glenda Johnson case against the DOJ and Judge Nuffer; Communication with Wayne Klein re Glenda Johnson contempt; Review and revise motion for corrected orders re approval to sale HD-4606-2 and HD-4606-2-1; Research re Rule 60(a) for motion; Communication with Jeff Balls re Rule 60(a); Communication with Wayne Klein re same; Review and revise notice of sale results for Payson, UT condominium; Coordinate filing re same; Draft notice of publication of California condominium; Coordinate filing re same	6.20	1,364.00
2/23/21	MSL	Review and revise proposed order for motion to correct orders re properties 4606-2 and 4606-2-1; Finalize motion to correct; Coordinate filing re same; Communication with Wayne Klein re receivership patents; Communication with Jeff Balls re same	1.20	264.00
2/25/21	MSL	Review and revise notice of sale results re Payson home; Coordinate filing re same	.40	88.00
3/02/21	MSL	Communication with Chad Pehrson re patent issues related to RaPower	.20	44.00
3/10/21	MSL	Review and revise proposed order re interference by Glenda Johnson, Hamblin, and Olsen with efforts to take control of Receivership property; Research re assessing creditability of witnesses without a hearing on a motion; Review previously filed documents re interference for proposed order	4.20	924.00
3/11/21	MSL	Communication with Wayne Klein re motion to amend correct orders; Draft request to submit re motion; Coordinate filing re same	.30	66.00
3/11/21	MSL	Review and revise proposed order re civil contempt of Glenda Johnson, Olsen, and Hamblin; Research re authority of receiver to decide who to recover joint and several liability judgment against; Communication with Jeff Balls re authority; Communication with Wayne Klein re proposed order	4.90	1,078.00
3/12/21	MSL	Review and finalize notice of sale results for three parcels in Millard County; Coordinate filing re same	.30	66.00

Invoice: 894793 May 27, 2021
RaPower-3 Receivership Client: 176390
Administration of Receivership Estate Matter: 1

Date	Tkpr	Description	Hours	Amount
3/15/21	MSL	Review revisions to proposed order re contempt of Glenda Johnson, Hamblin, and Olsen by receiver; Communication with Wayne Klein re revisions; Incorporate changes and finalize proposed order	1.90	418.00
3/16/21	MSL	Research re authority to enter sanctions for attorneys fees and to flip the burden of proving claims; Finalize proposed order including citations and proofing; Serve proposed order on opposing counsel for review; Communication with Jeff Balls and Wayne Klein re service of proposed order on opposing counsel and finalizing proposed order	3.60	792.00
3/17/21	MSL	Communication with Preston Olsen re proposed order	.30	66.00
3/17/21	MSL	Review orders re corrected legal descriptions on two Millard County Properties; Communication with Wayne Klein re same	.20	44.00
3/23/21	MSL	Review and revise motion for approval of public sale and grant of purchase option; Research re 8Minute Solar; Communication with Wayne Klein re same; Compile exhibits and coordinate filing re same	1.20	264.00
3/24/21	MSL	Draft notice of filing proposed order re civil contempt of Glenda Johnson, Hamblin, and Olsen; Coordinate filing re same	.40	88.00

TOTAL PROFESSIONAL SERVICES

\$ 10,004.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	370.00	.10	37.00
Michael S. Lehr	220.00	45.10	9,922.00
Sheryl Dirksen - Paralegal	150.00	.20	30.00
Amanda Bradley - Paralegal	150.00	.10	15.00
TOTALS		45.50	\$ 10.004.00

COSTS ADVANCED

Date	Description	Amount
1/25/21	Simplifile - County Recording Fees	45.00
1/27/21	Simplifile - County Recording Fees	45.00
2/01/21	Additional recording fees for Los Angeles County Recorder (Newhall/Santa	6.00
	Clarita deed - two extra pages)	
2/22/21	Simplifile - County Recording Fees	45.00
2/23/21	SimpleCertified Mail	7.36

TOTAL COSTS ADVANCED

\$ 148.36

TOTAL THIS INVOICE

\$ 10,152.36



May 27, 2021

RaPower-3 Receivership Wayne Klein, Receiver Klein & Associates P.O. Box 1836 Salt Lake City, UT 84110

wklein@Kleinutah.com

Invoice: 894793 Client: 176390 Matter: 1

REMITTANCE ADVICE

RE: Administration of Receivership Estate

BALANCE DUE THIS INVOICE \$10,152.36 Parr Brown Gee & Loveless Please return this advice with payment to: P.O. Box 11019 Salt Lake City, UT 84147 Wire Transfer Instructions: To Pay by Credit Card: _Visa __Mastercard __Discover __Amex JP Morgan Chase Bank 201 South Main St Ste 300 Salt Lake City, UT 84111-2870 Security Code # _____ Swift Code #: CHASUS33 Name on Account: _____ ABA #: 021000021 Billing Address: Parr Brown Gee & Loveless Account #: 912454114 Amount: \$ Payments accepted by phone (801) 532-7840

ACH Payment Instructions

ABA Routing #: 124001545 Online Payment: www.parrbrown.com

Account #: 912454114

Please reference your invoice #894793

Payable Upon Receipt

A finance charge of twelve percent (12%) per annum will accrue on any account not paid within thirty (30) days after the date of this invoice











May 27, 2021

RaPower-3 Receivership Wayne Klein, Receiver Klein & Associates P.O. Box 1836 Salt Lake City, UT 84110 wklein@Kleinutah.com

Invoice: 894794 Client: 176390 Matter: 2

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Asset Analysis & Recovery

Professional Services \$.00
Total Costs Advanced \$ 11.00

TOTAL THIS INVOICE \$ 11.00







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PARR BROWN GEE & LOVELESS

2

May 27, 2021 176390 Invoice: 894794 RaPower-3 Receivership Client: Asset Analysis & Recovery Matter:

COSTS ADVANCED

Date	Description	Amount
3/16/21	Court Documents, Certification of Document, USDC	11.00
	TOTAL COSTS ADVANCED	\$ 11.00
	TOTAL THIS INVOICE	\$ 11.00



May 27, 2021

RaPower-3 Receivership Wayne Klein, Receiver Klein & Associates P.O. Box 1836 Salt Lake City, UT 84110

wklein@Kleinutah.com

Invoice: 894794 Client: 176390 Matter: 2

REMITTANCE ADVICE

RE: Asset Analysis & Recovery

BALANCE DUE THIS INVOICE \$ 11.00 Parr Brown Gee & Loveless Please return this advice with payment to: P.O. Box 11019 Salt Lake City, UT 84147 Wire Transfer Instructions: To Pay by Credit Card: _Visa __Mastercard __Discover __Amex JP Morgan Chase Bank 201 South Main St Ste 300 Salt Lake City, UT 84111-2870 Security Code # _____ Swift Code #: CHASUS33 Name on Account: _____ ABA #: 021000021 Billing Address: Parr Brown Gee & Loveless Account #: 912454114 Amount: \$

ACH Payment Instructions

ABA Routing #: 124001545 Online Payment: www.parrbrown.com

Account #: 912454114

Please reference your invoice #894794

Payable Upon Receipt

A finance charge of twelve percent (12%) per annum will accrue on any account not paid within thirty (30) days after the date of this invoice



Payments accepted by phone (801) 532-7840









May 27, 2021

RaPower-3 Receivership Wayne Klein, Receiver Klein & Associates P.O. Box 1836 Salt Lake City, UT 84110 wklein@Kleinutah.com

Invoice: 894796 Client: 176390 Matter: 4

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Litigation

Professional Services \$89,625.50
Total Costs Advanced \$575.00

TOTAL THIS INVOICE \$ 90,200.50







Invoice: 894796 May 27, 2021
RaPower-3 Receivership Client: 176390
Litigation Matter: 4

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/03/21	MSL	Review discovery in Ina Newman case	.50	110.00
1/03/21	MSL	Communication with Jeff Balls re Jameson discovery requests; Research re whether requests by Jameson was improper under federal rules; Review requests	.70	154.00
1/04/21	JAB	Telephone conference with Donald Reay re Richard Jameson discovery; Revise discovery responses to Richard Jameson; Review documents from Los Angeles County recorder; Telephone conference with Wayne Klein re same	3.40	986.00
1/04/21	KJW	Review files on record with the Utah Division of Water Rights for Water Right No. 68-2388; Locate document number in Millard County real property records	1.20	366.00
1/04/21	MSL	Communication with counsel for Nelson Snuffer re amending scheduling order	.20	44.00
1/04/21	MSL	Multiple communications with Jeff Balls re Jameson discovery responses	.40	88.00
1/04/21	MSL	Communication with Jeff Balls re reply in support of motion for summary judgment in Shepard case	.30	66.00
1/05/21	JAB	Draft reply in support of motion for summary judgment; Conference with Mike Lehr	2.20	638.00
1/05/21	KJW	Telephone conferences with Millard County Recorder's Office; Review incoming correspondence and related documents from Millard County Recorder's Office; Prepare chain of title; Prepare maps; Prepare report of conveyance for Water Right No. 68-2388	3.00	915.00
1/05/21	MSL	Communication with counsel for Stacy Snow re discovery issues and timing of summary judgment motions	.20	44.00
1/05/21	MSL	Communicate and strategize with Wayne Klein re discovery issues, timing, and motions for summary judgement in case against Nelson Snuffer; Review communications and documents re same in preparation for communication	1.00	220.00
1/05/21	MSL	Communication with Jeff Balls re Monty Hamilton case, potential default judgment, and reply in support of summary judgment in Shepard case	.30	66.00
1/06/21	JAB	Call court clerk re hearing for motion to sell; Draft reply memorandum in support of motion for summary judgment	.70	203.00
1/06/21	MSL	Review pleadings and communications re Nelson Snuffer case for issues and damages that can be separated from document production issues; Draft proposal for bifurcated discovery and issues in case for counsel for Nelson Snuffer	1.60	352.00
1/07/21	JAB	Draft amended deeds; Conference with Mike Lehr re Nelson Snuffer discovery; Draft discovery responses to Jameson	1.80	522.00
1/07/21	MSL	Communication with Steven Paul re Snow lawsuit discovery issues and extension; Draft motion to amend scheduling order and amended scheduling order; Coordinate filing re same	.60	132.00

Invoice: 894796 May 27, 2021
RaPower-3 Receivership Client: 176390
Litigation Matter: 4

Date	Tkpr	Description	Hours	Amount
1/07/21	MSL	Revise proposal for extension of fact discovery in Nelson Snuffer case; Communication with Jeff Balls re same	.70	154.00
1/08/21	JAB	Draft discovery responses to Wayne Klein; Telephone conference with Wade re sale of Payson home; Telephone conference with Blake Heiner re correcting warranty deeds; Telephone conference with Steven Paul	2.20	638.00
1/08/21	MSL	Review and revise discovery responses in Jameson case; Communication with Jeff Balls re same	.90	198.00
1/08/21	MSL	Review pleadings, discovery, and deposition transcript in Ina Newman case for motion for summary judgment	3.70	814.00
1/09/21	MSL	Review Ina Newman settlement agreement with Neldon Johnson and IAS for summary judgment motion	.50	110.00
1/10/21	MSL	Review deposition of Ina Newman; Review discovery in Ina Newman case; Review communications with counsel for Ina Newman; Review and research Salem property documents; Draft facts section in for motion for summary judgment in Newman case	6.20	1,364.00
1/11/21	JAB	Email Steven Paul re service on Hamblin	.10	29.00
1/11/21	MSL	Draft motion for summary judgment in Ina Newman case; Review loan and payment documents of Neldon Johnson and Ina Newman Zions Bank loan; Review documents produced by Ina Newman including settlement agreement; Conference with Jeff Balls re claims against Ina Newman and summary judgment motion; Communication with Wayne Klein re documents related to claims against Ina Newman	4.20	924.00
1/12/21	JAB	Email Steven Paul re order to show cause; Review correspondence form Mike Skolnick; Conference with Mike Lehr; Draft reply in support of motion for summary judgment	1.60	464.00
1/12/21	MSL	Draft motion for summary judgment in Ina Newman case; Communication with counsel for Ina Newman re timing of summary judgment; Conference with Jeff Balls re claims against Ina Newman and summary judgment motion; Review docket and filings in Neldon Johnson bankruptcy action related to Ina Newman and property of IAS; Review documents from the Utah County recorders office related to Ina Newman and claims against her; Communication with Wayne Klein re documents related to claims against Ina Newman	8.10	1,782.00
1/13/21	JAB	Finalize corrective warranty deeds; Email Steven Paul re same; Review and revise motion for publication of sale of LA property; Draft stipulated motion for extension	2.90	841.00
1/13/21	KJW	Review incoming correspondence from the Division of Water Rights re the processed report of conveyance for Water Right No. 68-2388; Internal correspondence with Jeff Balls re same; Telephone conference with Dana Dredge	.50	152.50
1/13/21	MSL	Research re effect of orders re fraud in underlying receivership case and ancillary cases against commission recipients for reply in support of summary judgment motions in commissions cases; Research re evidentiary rules and exceptions relevant to commission recipient cases; Communication with Jeff Balls re reply	4.30	946.00

Invoice: 894796 May 27, 2021
RaPower-3 Receivership Client: 176390
Litigation Matter: 4

Date	Tkpr	Description	Hours	Amount
1/13/21	MSL	Communication with Wayne Klein re claims against Ina Newman for summary judgment motion; Review documents in Ina Newman case re same	.80	176.00
1/14/21	JAB	Conference with Mike Lehr; Telephone conference with Wayne Klein; Telephone conference with Wade re Payson home sale; Email Wayne Klein re Chase settlement	1.00	290.00
1/14/21	MSL	Communication with Jeff Balls re research and strategy for reply in support of summary judgment motions for commission recipients	.30	66.00
1/14/21	SD	Research at Utah Water Rights Division to identify, coordinate and summarize new uploaded information for water users into working files	.10	15.00
1/15/21	JAB	Email Robb Jones re Kinsey matter; Draft motion to amend scheduling order	.70	203.00
1/15/21	MSL	Draft motion for summary judgment re factual circumstance of properties purchased by IAS in 2006; Review bank records and closing documents re same	1.50	330.00
1/15/21	MSL	Communication with conflicts counsel re summary judgment motions filed against commission recipients; Communication with Jeff Balls re settlement with Chase Bank; Review Receiver's comments re settlement with Chase	.60	132.00
1/17/21	MSL	Draft motion for summary judgment in Ina Newman case including section re undisputed material fact, fraudulent transfers and insolvency; Review annual reports of IAS and financial statements for motion; Research re admissibility of SEC filings	6.50	1,430.00
1/18/21	MSL	Draft Ina Newman motion for summary judgment; Research re insolvency under Utah fraudulent transfer statute; Research re admissibility of SEC filings for Ina Newman summary judgment motion	3.60	792.00
1/19/21	JAB	Email Melanie Vartabedian; Draft reply memorandum in support of motion for summary judgment	1.30	377.00
1/19/21	MSL	Draft motion for summary judgment in Ina Newman case; Review loan and payment documents of Neldon Johnson and Ina Newman Zions Bank loan; Review documents produced by Ina Newman including settlement agreement	3.80	836.00
1/20/21	JAB	Draft reply in support of motion for summary judgment; Conference with Mike Lehr re Ina Newman summary judgment motion	3.40	986.00
1/20/21	MSL	Draft motion for summary judgment in Ina Newman case including sections re each fraudulent transfer claim, and unjust enrichment claims; Review agreements, loan and payment documents, documents related to Neldon Johnson bankruptcy, documents produced by Ina Newman, and IAS corporate records; Conference with Jeff Balls re claims against Ina Newman and summary judgment motion; Communication with Wayne Klein re unjust enrichment claims against Ina Newman	13.60	2,992.00
1/20/21	SD	Research at Utah Water Rights Division to identify, coordinate and summarize new uploaded information for water users into working files	.10	15.00

Date	Tkpr	Description	Hours	Amount
1/21/21	JAB	Review motion for summary judgment for Ina Newman; Review correspondence re Payson properties; Email Wayne Klein re meeting with Greg Shepard	1.20	348.00
1/21/21	MSL	Communication with counsel for Nelson Snuffer re fact discovery extension	.40	88.00
1/21/21	MSL	Review and revise motion for summary judgment in Ina Newman case including section re unjust enrichment claims, introduction, revisions to material facts sections re solvency; Correspond with Wayne Klein re documents in Ina Newman case; Review pleadings, discovery, agreements, loan and payment documents, documents related to Neldon Johnson bankruptcy, documents produced by Ina Newman, and IAS corporate records; Conference with Jeff Balls re claims against Ina Newman and summary judgment motion; Communication with Wayne Klein re unjust enrichment claims against Ina Newman	9.50	2,090.00
1/22/21	JAB	Conference with Mike Lehr; Draft reply memorandum in support of motion for summary judgment; Travel to Sandy to meet with Greg Sheperd and Steve Bowers; Conference with Wayne Klein, Greg Sheperd, and Steve Bowers; Email Wayne Klein re dismissal of settled cases	5.90	1,711.00
1/22/21	MSL	Draft declaration of receiver in support of summary judgment motion against Ina Newman; Incorporate changes made by Wayne Klein to motion for summary judgment; Review and revise motion including update and clarification re release of Zions Loan by IAS against Ina Newman; Draft appendix of exhibits for motion; Compile exhibits for motion; Coordinate filing re motion	9.80	2,156.00
1/25/21	JAB	Draft reply memorandum in support of motion for summary judgment; Review order from court re Payson home; Review hearing date for Payson home and condo; Email Wayne Klein re same	6.40	1,856.00
1/25/21	MSL	Research re judicial notice of prior decisions in related cases; Research re law of the case doctrine and whether findings from underlying case qualify as law of the case; Communication with Jeff Balls re research and responses to objections by commission recipients to use of prior decisions in summary judgment motion	4.40	968.00
1/26/21	JAB	Draft reply memorandum in support of motion for summary judgment; Telephone conference with Steven Paul	6.90	2,001.00
1/26/21	MSL	Draft section re use of prior findings of receivership court in ancillary actions for reply in support of motion for summary judgment re commission recipients; Draft section re judicial notice re same; Research re authority of receivership court to use findings from underlying action and judicial notice; Research re judicial notice; Review and revise reply in support of motion for summary judgment; Communication with Jeff Balls re same	6.60	1,452.00
1/27/21	JAB	Draft reply memorandum in support of motion for summary judgment for Trudy Shepherd, Paul Brennan, and Paul Jones; Draft notice of dismissal for Connie Kulacz; Email Steven Paul re same; Draft notice of dismissal for Gleaves Swearingen; Email John Mertens re same	5.30	1,537.00

Date	Tkpr	Description	Hours	Amount
1/27/21	MSL	Communication with counsel for Nelson Snuffer re scheduling order	.20	44.00
1/28/21	JAB	Review and revise motion to approve sale of California condo; Conference with Mike Lehr re Nelson Snuffer; Correspond with Wayne Klein Jeron Johnson; Telephone conference with Shane Luke	3.00	870.00
1/28/21	MSL	Communication with Wayne Klein re Nelson Snuffer scheduling order, documents, timing, and privilege issues; Communication with counsel for Nelson Snuffer re same; Draft correspondence with counsel for Nelson Snuffer re same; Review documents related to narrow issues to conduct discovery over in two-tiered discovery	2.20	484.00
1/29/21	JAB	Email Scott and Shauna Black re settlement; Draft acknowledgement of interest for Shepards; Email Wayne Klein re same; Email Steven Paul re Roger Hamblin order to show cause; Review stipulation for order of contempt; Correspond with Wayne Klein re same; Draft status report for Jeron Johnson; Email Jeron Johnson re breach of settlement agreement; Draft reply in support of motion for summary judgment	3.10	899.00
2/01/21	JAB	Review Glenda Johnson's opposition to order to show cause; Telephone conference with Shane Luke re settlement; Revise status report for Jeron Johnson; Draft reply memorandum in support of motion for summary judgment for Joseph Scraggs; Email Wayne Klein re Shane Luke settlement; Draft motion for default judgment against Michael Hampton	4.00	1,160.00
2/01/21	MSL	Review and revise stipulated motion to amend scheduling order; Communication with counsel for Nelson Snuffer re same	.50	110.00
2/01/21	MSL	Review and revise Johnson status update	.20	44.00
2/01/21	MSL	Review court's notices re scheduling orders in cases including Zeigler, Stewart, Stilson, Shepard, others; Review docket in each each for contact information of defendants; Draft correspondence with Zeigler and Stewart re scheduling orders; Communication with Jeff Balls re default judgments and summary judgment motions in these cases; Begin drafting motion for scheduling order	1.60	352.00
2/02/21	JAB	Email Wayne Klein re Plaskolite documents; Draft motion for default judgment against Robert Tilden and Hinton Battle; Draft motion for entry of default against Joel Bean, Mike Mahler, and Dennis Stilson; Telephone conference with Wayne Klein re Plaskolite discovery; Draft request to submit for decision on Abraham property; Draft initial disclosures for Andrew Zeigler, Raleigh Stewart, and Steven King	4.10	1,189.00
2/02/21	MSL	Draft attorney planning meeting documents and proposed scheduling order in Hamilton litigation; Communication with Wayne Klein re Hamilton litigation; Review records for contact information for defendants Freeborn, Stilson, King, and Frandsen; Communication with Wayne Klein re same	1.50	330.00
2/03/21	JAB	Draft reply memorandum in support of motion for summary judgment for Joseph Scraggs; Draft motion for default judgment against Dennis Stilson, Joel Bean, and Mike Mahler	5.30	1,537.00
2/03/21	MSL	Prepare proposed scheduling order in Hamilton litigation; Conference with Wayne Klein and Monty Hamilton re settlement and claims asserted against Hamilton	2.30	506.00

Date	Tkpr	Description	Hours	Amount
2/03/21	MSL	Draft attorney planning meeting and scheduling order documents in Zeigler case; Correspond with Zeigler and Wayne Klein re settlement and scheduling order	.70	154.00
2/04/21	JAB	Draft reply in support of motion for summary judgment for Janet Roe, Carey Hadderton, Kirk Newman, Steve Chaston, Kelvin Smith, and Mark Manley; Conference with Mike Lehr re attorney planning meeting reports; Review order granting motion to approve public sale of HD-4606-2-1; Email Wayne Klein re same; Review order of publication for Newhall CA condo; Email Wayne Klein re same; Email Don Reay	4.90	1,421.00
2/04/21	MSL	Conference with Zeigler re scheduling order and claim against him; Draft attorney planning meeting report and scheduling order re Zeigler; Coordinate filing re same	1.00	220.00
2/04/21	MSL	Draft motion for entry of scheduling order in Stewart litigation; Review previous attempts to communicate with Stewart; Draft proposed scheduling order; Coordinate filing of motion and scheduling order	2.50	550.00
2/04/21	MSL	Draft motion for entry of scheduling order in King case; Attempt to contact King by phone; Draft proposed scheduling order	.70	154.00
2/04/21	MSL	Draft status report in Stilson litigation; Review prior communication with Stilson; Coordinate filing of status report; Communication with Jeff Balls re Stilson	.80	176.00
2/05/21	JAB	Email Monica Call re documents; Review order re Zoom hearing for Newhall condo sale; Email Wayne Klein re same; Telephone conference with Steven Bowers; Draft stipulated motion to dismiss Steven Bowers; Review proposed amended scheduling order	1.70	493.00
2/05/21	MSL	Review and revise motion for scheduling order in King case; Coordinate filing re King motion for scheduling order; Communication with Jeff Balls re Bowers dismissal	.40	88.00
2/05/21	MSL	Review Taylor discovery requests and responses re correspondence with counsel for Taylor re issues with responses; Draft communication re issues with Taylor's responses; Communication with Jeff Balls re same	1.10	242.00
2/08/21	JAB	Review initial disclosures from Andrew Zeigler; Email Andrew Zeigler re initial disclosures; Email Raleigh Stewart re initial disclosures; Mail Steven King re initial disclosures; Conference with Mike Lehr; Review property records for Utah county	1.40	406.00
2/08/21	MSL	Communication with counsel for Nelson Snuffer re amended scheduling order	.30	66.00
2/08/21	MSL	Review Zeigler's initial disclosures	.20	44.00
2/08/21	MSL	Conference with counsel for Taylor and Snow re discovery issues; Prepare for conference	.30	66.00
2/09/21	JAB	Prepare for hearing; Attend hearing; Review correspondence from Wayne Klein; Review affidavits of publication; Draft notice of publication; Telephone conference with Vicky Mahler; Email Wayne Klein re settlement with Mahler; Telephone conference with Mark Rose; Draft notice of dismissal for Robert Rowbotham; Email Vickie Mahler re settlement	2.00	580.00

Date	Tkpr	Description	Hours	Amount
2/10/21	JAB	Conference with Mike Lehr re Freeborn complaint	.40	116.00
2/10/21	MSL	Planning meeting conference with Freeborn to discuss scheduling and claims; Review pleadings in Freeborn case; Communication with Wayne Klein conference	1.40	308.00
2/10/21	MSL	Draft motion to amend scheduling order in Taylor litigation; Draft proposed scheduling order in Taylor case; Communication with counsel for Taylor re same; Coordinate filings re same	.80	176.00
2/10/21	MSL	Draft proposed scheduling order and attorney planning meeting documents in Mark Shepard case; Communication with Shepard re same	.50	110.00
2/10/21	MSL	Review pleadings in Hutchings case	.20	44.00
2/11/21	JAB	Draft summary judgment motion against Roger Hamblin; Email Wayne Klein re same; Review order granting motion to sell Payson home and condo; Email Wayne Klein re same; Email Wayne Klein re Mike Mahler settlement; Email Wayne Klein re Shane Luke	2.30	667.00
2/11/21	MSL	Communication with Mark Shepard re attorney planning meeting	.10	22.00
2/12/21	JAB	Conference with Mike Lehr re status of cases; Draft motion to extend scheduling order for Paul Brennan; Correspond with Steve Paul re same; Attend status conference with Judge Nuffer re Shane Luke; Email title company re corrective warranty deed; Email Wayne Klein re settlement status	2.60	754.00
2/12/21	MSL	Communication with Freeborn re settlement of claims; Communication with Wayne Klein re same; Draft status report re Freeborn case; Coordinate filing re same; Draft attorney planning meeting document in Freeborn case	1.10	242.00
2/12/21	MSL	Draft status report re Mahler case; Coordinate filing re same	.50	110.00
2/12/21	MSL	Draft status report and notice of settlement in Hamilton case; Coordinate filing re same	.50	110.00
2/12/21	MSL	Draft status report and notice of disposition in Rowbotham, Bigger Faster Stronger case; Coordinate filing re same	.50	110.00
2/12/21	MSL	Telephone conference with Mark Shepard for attorney planning meeting; Draft attorney planning meeting and scheduling order documents; Coordinate filing re same	.60	132.00
2/16/21	JAB	Telephone conference with Steven Bowers; Draft motion for default against Jeron Johnson	.40	116.00
2/17/21	JAB	Draft reply in support of motion for summary judgment against Melvin Day, Richard Neal Searcy, Reinhold Finkes, Jeffrey Turner; Email Melanie Vertabedian	3.30	957.00
2/18/21	JAB	Draft reply memorandum in support of motion for summary judgment against Jeffrey Turner, Gracie and Kevin Kerr, Lindy Welborn, and Bell Energy Holdings	3.90	1,131.00
2/22/21	JAB	Conference with Mike Lehr; Draft complaint against Evan Ayres	1.60	464.00
2/22/21	MSL	Draft letter to Freeborn re disclosures for the estate of Roger Freeborn; Draft form response document re same	.40	88.00

Date	Tkpr	Description	Hours	Amount
2/22/21	MSL	Review opposition to motion for summary judgment in Newman case; Communication with Wayne Klein re same	.40	88.00
2/23/21	JAB	Prepare for hearing on sale of Newhall Condo; Attend hearing on sale for Newhall condo; Email Jeron Johnson	.80	232.00
2/24/21	JAB	Conference with Mike Lehr re Jeron Johnson; Telephone conference with Jeron Johnson; Prepare summons for Ayers complaint; Review status report; Email Robb Jones	4.00	1,160.00
2/24/21	MSL	Review emails with Jeron Johnson; Communication with Jeff Balls re Johnson	.30	66.00
2/24/21	MSL	Review opposition to motion for summary judgment by Newman; Research ability to submit evidence in reply under Rule 56	2.50	550.00
2/24/21	MSL	Communication with Jeff Balls re discovery plans in multiple cases and status report re pending litigation to submit to the court	.40	88.00
2/24/21	SD	Research at Utah Water Rights Division to identify, coordinate and summarize new uploaded information for water user for water right 51-7009	.10	15.00
2/25/21	JAB	Revise status report; Email Wayne Klein re same; Review order granting motion for summary judgment; Draft initial disclosures to Mark Shepard and Jacqueline Freeborn; Conference with Mike Lehr and Wayne Klein re status; Draft order granting motion for summary judgment	5.50	1,595.00
2/25/21	MSL	Review court's order granting summary judgment in Shepard case and others; Correspond with Jeff Balls re order and proposed order to be filed with the court	.80	176.00
2/25/21	MSL	Review Ina Newman's opposition to summary judgment motion and exhibits; Draft outline of argument for reply in response to opposition; Conference with Wayne Klein re Newman opposition	4.90	1,078.00
2/26/21	JAB	Email Mark Shepard; Telephone conference with Jeron Johnson; Finalize motion for summary judgment against Lunn; Draft motion to amend scheduling order for Melvin Day, Mark Manley, and Kelvin Smith; Telephone conference with Steven Paul re same; Revise special status report; Draft dismissal of Mike Mahler; Draft stipulated dismissal of Monty Hamilton and Scott Black; Email Scott Black re dismissal	3.90	1,131.00
2/26/21	MSL	Review Receiver's responses to Nelson Snuffer's discovery requests; Review pleadings in Nelson Snuffer case for discovery requests; Review documents related to Robert Johnson for discovery requests; Draft discovery requests to Nelson Snuffer; Communication with Jeff Balls re same	2.50	550.00
2/26/21	MSL	Review pleadings in Jeron Johnson litigation; Communication with Jeff Balls re same	.20	44.00
2/26/21	MSL	Compile exhibits re summary judgment in Lunn case; Coordinate filing re same; Communication with Jeff Balls re same	.40	88.00
2/28/21	MSL	Draft discovery requests to Nelson Snuffer; Review Receiver's responses to Nelson Snuffer's discovery requests; Review pleading in Nelson Snuffer case for discovery requests; Review documents related to Robert Johnson for discovery requests	6.70	1,474.00

Date	Tkpr	Description	Hours	Amount
3/01/21	JAB	File stipulated dismissal for Scott and Shaunda Black; Email Wayne Klein re summary judgment motions; Telephone conference with Steven Paul re settlement; Draft status report re settlements; Draft order granting motion for summary judgment	2.10	609.00
3/01/21	MSL	Communication with Wayne Klein re discovery requests to Nelson Snuffer; Review comments re discovery by Receiver; Revise discovery to conform with comments from Receiver; Research re compound discovery	2.70	594.00
3/02/21	JAB	Conference with Mike Lehr re discovery requests to Nelson Snuffer; Review status of pleadings; Review orders granting motion for summary judgment; Email Steven Paul re summary judgment motions	.80	232.00
3/02/21	MSL	Finalize discovery requests to Nelson Snuffer; Communication with Wayne Klein and Jeff Balls re same; Coordinate service of discovery requests upon Nelson Snuffer; Communication with counsel for Nelson Snuffer re search terms and waiver of the privilege	2.20	484.00
3/02/21	MSL	Review Ina Newman opposition to motion for summary judgment; Review citations in opposition to motion to summary judgment; Draft reply in support of motion for summary judgment including responses to disputes by Newman	8.20	1,804.00
3/03/21	JAB	Review order re status report; Telephone conference with Steve Bowers; Telephone conference with Steven Paul re summary judgment motions and Snow; Draft summary judgment against Nick Kontos and Robert Aulds	3.30	957.00
3/03/21	MSL	Draft reply in support of motion for summary judgment including responses to disputes by Newman; Draft response to evidentiary objection by Newman; Research re standard of proof under the Utah Fraudulent Transfer Act; Review Ina Newman opposition to motion for summary judgment	9.70	2,134.00
3/04/21	JAB	Draft motion for overlength brief; Draft reply memorandum in support of motion for summary judgment against Dallas Plater and Amber Bennett	1.60	464.00
3/04/21	MSL	Draft reply in support of motion for summary judgment including sections re reasonably equivalent value, actual intent, and unjust enrichment; Revise reply; Research re variety of issues for reply; Review opposition filed by Newman; Communication with Wayne Klein re same	14.30	3,146.00
3/05/21	JAB	Draft reply memorandum in support of motion for summary judgment against James Woodson, Linda and Steven Payne, and John Howell; Review reply memorandum in support of motion for summary judgment against Ina Newman; Telephone conference with Jessica; Draft proposed order granting summary judgment; Review settlement offer for Aulds; Email Wayne Klein re same	6.70	1,943.00
3/05/21	MSL	Communication with counsel with Nelson Snuffer re waiver of attorney- client motion	.20	44.00
3/05/21	MSL	Communication with Wayne Klein re Ina Newman reply; Review and incorporate changes to reply by Wayne Klein; Finalize reply; Compile exhibits for reply; Coordinate filing re same	3.70	814.00
3/06/21	JAB	Draft order granting motion for summary judgment	3.10	899.00

Date	Tkpr	Description	Hours	Amount
3/08/21	JAB	Correspond with Wayne Klein re Aulds settlement; Draft motion to extend deadline for Snow; Email Steven Paul re same; Draft orders granting motion for summary judgment	4.10	1,189.00
3/08/21	MSL	Draft communication with counsel for Nelson Snuffer re waiver of attorney-client privilege and search terms; Review discovery and pleadings re same	1.00	220.00
3/08/21	MSL	Review proposed order in Shepard litigation; Communication with Wayne Klein re same	.60	132.00
3/09/21	JAB	Draft orders on motion for summary judgment; Email Steven Paul re same; Telephone conference with Evan Ayres	5.60	1,624.00
3/09/21	EW	Search and change summary judgment motion docket sightings, names and accumulating interest for defendants	3.40	510.00
3/10/21	JAB	Draft motion for summary judgment against Jean Armand; Email Steven Paul re Aulds settlement	1.20	348.00
3/11/21	JAB	Telephone conference with Robb Jones re settlement for Ed Kinsey; Conference with Mike Lehr; Review settlement offer for Aulds; Email Wayne Klein re same	.40	116.00
3/12/21	JAB	Review correspondence re Aulds settlement; Email Steven Paul re same; Review settlement offer from Chase Bank; Draft order granting summary judgment for Amber Bennett, John Howell, Linda and Steven Payne, Dallas Plater, and James Woodson	3.50	1,015.00
3/15/21	JAB	Email Steven Paul re proposed summary judgment orders; Draft reply memorandum in support of motion for summary judgment against Roger Hamblin; Telephone conference with Steven Paul; Email Melanie Vartabedian re Chase settlement; Draft notice of dismissal for Evan Ayres; Telephone conference with Monica Call	4.30	1,247.00
3/15/21	MSL	Review response to objection to evidence by Ina Newman; Review pleadings related to objection; Communication with Wayne Klein re same	.70	154.00
3/16/21	JAB	Draft notice of filing for proposed orders granting summary judgment orders; Review correspondence from Steven Paul re Aulds settlement; Email Wayne Klein re same; Email Robb Jones re Ed Kinsey; Review settlement offer for Bell Energy; Email Wayne Klein re same; Email Steve Paul re same; Draft order granting motion for summary judgment against Roger Hamblin; Email Steven Paul re Aulds settlement; Draft motion to amend scheduling order for Ed Kinsey; Email court re order in Bell Energy	4.00	1,160.00
3/16/21	MSL	Coordinate filing of stipulated motion to amend in litigation against Clement; Communication with Jeff Balls re same	.30	66.00
3/17/21	JAB	Draft order granting summary judgment for Roger Hamblin; Email Steven Paul re same; Email Monty Hamilton; Draft notice of settlement for Bell Energy; Draft notice of settlement for Robert Aulds	3.90	1,131.00
3/17/21	MSL	Multiple telephone communications with Chaston re settlement; Communication with Wayne Klein and Jeff Balls re same	.90	198.00

Invoice: 894796 May 27, 2021
RaPower-3 Receivership Client: 176390
Litigation Matter: 4

Date	Tkpr	Description	Hours	Amount
3/18/21	JAB	Telephone conference with Wayne Klein re settlement agreements; Conference with Mike Lehr; Email Melanie Vartabedian re settlement agreement; Review settlement offer from Kelvin Smith; Email Wayne Klein re same; Email Steven Paul re same	1.00	290.00
3/18/21	MSL	Communication with Chaston re settlement agreement; Review settlement agreement; Draft notice of settlement in Chaston case; Coordinate filing re same	1.00	220.00
3/19/21	JAB	Email Monty Hamilton re dismissal; Review and revise ninth motion to approve settlements; Review Rule 68 offer from Richard Jameson	1.50	435.00
3/19/21	MSL	Review Rule 68 offer of judgment; Research re Rule 68 offers; Draft communication with Wayne Klein re offer; Communicate with Jeff Balls re same	.70	154.00
3/22/21	JAB	Telephone conference with Steven Paul; Revise ninth motion to approve settlements; Draft notice of proposed orders; Review settlement offer from Ed Kinsey; Email Wayne Klein re same; Email Robb Jones re same; File proposed orders for summary judgment	3.30	957.00
3/22/21	MSL	Communication with Jeff Balls re notice of filing order re contempt of Glenda Johnson, Hamblin, and Olsen	.20	44.00
3/23/21	JAB	Email Wayne Klein re settlement agreement from Chase	.10	29.00
3/23/21	MSL	Communication with Wayne Klein re Jameson settlement offer	.30	66.00
3/24/21	JAB	Telephone conference with Monica Call; Review Plaskolite documents	.50	145.00
3/26/21	JAB	Review settlement offer from Jeffrey Turner; Email Wayne Klein re same; Review signed settlement agreement from Kelvin Smith; File proposed order granting summary judgment against Hamblin; Draft notice of filing re same; Email Steven Paul re Turner settlement agreement; Review settlement offer from Nick Kontos; Email Wayne Klein re same; Email Wayne Klein	1.60	464.00
3/29/21	JAB	Revise order granting motion for summary judgment; Email Steven Paul re Kontos settlement	.40	116.00
3/29/21	MSL	Communication with counsel for Nelson Snuffer re discovery responses and timing of document production; Communication with Wayne Klein and Jeff Balls re same; Draft response to Nelson Snuffer request	2.50	550.00
3/30/21	JAB	Review settlement offer from Frank Lunn; Email Wayne Klein re same; Revise and file notice of sale for California property; Review and revise motion to approve sale of warehouse property	1.30	377.00
3/30/21	MSL	Review and revise communication to counsel for Nelson Snuffer re discovery responses	.30	66.00
3/31/21	MSL	Review and revise search terms list to counsel for Nelson Snuffer; Communication with counsel for Nelson Snuffer re same; Communication with Wayne Klein re same	.60	132.00

TOTAL PROFESSIONAL SERVICES

\$ 89,625.50

Invoice: 894796 May 27, 2021
RaPower-3 Receivership Client: 176390
Litigation Matter: 4

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jeffery A Balls	290.00	159.50	46,255.00
Kassidy J Wallin	305.00	4.70	1,433.50
Michael S. Lehr	220.00	188.10	41,382.00
Sheryl Dirksen - Paralegal	150.00	.30	45.00
Eric Wheeler - Paralegal	150.00	3.40	510.00
TOTALS		356.00	\$ 89,625.50

COSTS ADVANCED

Date	Description	Amount
1/05/21	Division of Water Rights File Report of Water Right Conveyance	40.00
1/05/21	Court Documents, Millard County Recorder	5.00
1/05/21	Court Documents, Millard County Recorder processing fee	1.50
1/19/21	Court Documents, Millard County processing fee	1.50
1/19/21	Court Documents, Millard County	5.00
2/24/21	Filing Fees, Complaint, Utah District Court	402.00
3/09/21	Sting Ray Legal Services - service of process on Evan Ayres	120.00

TOTAL COSTS ADVANCED \$ 575.00

TOTAL THIS INVOICE \$ 90,200.50



May 27, 2021

RaPower-3 Receivership Wayne Klein, Receiver Klein & Associates P.O. Box 1836 Salt Lake City, UT 84110

wklein@Kleinutah.com

Invoice: 894796 Client: 176390 Matter: 4

REMITTANCE ADVICE

RE: Litigation

BALANCE DUE THIS INVOICE \$ 90,200.50 Parr Brown Gee & Loveless Please return this advice with payment to: P.O. Box 11019 Salt Lake City, UT 84147 Wire Transfer Instructions: To Pay by Credit Card: _Visa __Mastercard __Discover __Amex JP Morgan Chase Bank 201 South Main St Ste 300 Salt Lake City, UT 84111-2870 Security Code # _____ Swift Code #: CHASUS33 Name on Account: _____ ABA #: 021000021 Billing Address: Parr Brown Gee & Loveless Account #: 912454114 Amount: \$

ACH Payment Instructions

ABA Routing #: 124001545 Online Payment: www.parrbrown.com

Account #: 912454114

Please reference your invoice #894796

Payable Upon Receipt

A finance charge of twelve percent (12%) per annum will accrue on any account not paid within thirty (30) days after the date of this invoice



Payments accepted by phone (801) 532-7840





EXHIBIT B-3



136 East South Temple, Suite 1300 Salt Lake City, Utah 84111 (801) 363-5678 Facsimile (801) 364-5678 www.mc2b.com

TTORNEY 5

Wayne Klein RaPower-3, LLC Receivership KLEIN & ASSOCIATES, PLLC P.O. Box 1836 Salt Lake City, UT 84110

Page No: Statement Date: 01/31/2021 Account No: 21868-00030 Statement No: 61637

Donald Reay, Reay Law, PLLP

Fees

		Hours	
01/04/2021 DCC	Draft e-mail to opposing counsel re discovery issues.	0.20	70.00
01/05/2021 DCC	Draft e-mail to MMLongson re follow up needed in case re discovery.	0.20	70.00
DCC	Read e-mail from Don Reay discovery issues.	0.20	70.00
01/07/2021 DCC	Draft e-mail to MMLongson re motion needed and other information in case; Read e-mail from MMLongson and draft motion and proposed order in case and draft email to MMLongson re same; e-mail exchange with Don Reay re discovery.	0.80	280.00
01/11/2021 DCC	Read email from Don Reay re stip and order; edit documents and arrange for same to be filed.	0.30	105.00
01/22/2021 MML	Contact court re extension of discovery deadlines and non-issuance of order.	0.20	44.00

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		Page N		2
		Statement Dat	e:	01/31/2021
RaPower-	3, LLC Receivership	Account N		21868-00030
101 0 1101	3, LEC RECEIVEDING	Statement N	0:	61637
			Hours	
01/25/2021			Hours	
DCC	Read order from court extending discovery deadline	es read		
DCC	follow up emails re same.	cs, read	0.20	70.00
	ionow up chans to same.		0.20	70.00
01/28/2021				
DCC	Read file and draft e-mail to receiver re discovery i	ccues in		
DCC	case; conference with MMLongson re same; read e			
	from receiver; draft deposition notice; draft e-mail			
	opposing counsel; draft e-mail to receiver; follow u			
		•		
	exchange with Don Reay; draft e-mail to receiver re		1.00	350,00
	up with Reay; follow up e-mail exchanges with Rea	ay.	1.00	330.00
01/29/2021				
DCC	Draft e-mail to opposing counsel and receiver re de	enosition:		
DCC	analyze issues for deposition of Reay and conferen	*		
	MMLongson re same.	cc willi	0.70	245.00
	WIVILongson te same.		0.70	243.00
MML	Review/analyze memo and documents from client	re Reav		
1411417	deposition and summary judgment issues.	ic Reay	2.00	440.00
			-	
	For Current Services Rendered		5.80	1,744.00
	Paganitulation			
Timekee	Recapitulation per Hour	rs Rate		Total
	. Castleberry 3.6		¢ 1	260.00
		·		
Witten IVI	Longson 2.2	0 220.00		484.00
	Expenses			
	Expenses			
	Computer Research Westlaw			5.78
	•			
	Total Expenses			5.78
	Advances			
4.0.0.15.5.5				
12/30/2020	Electronic Document Processing PACER [billed q	uarterly] -		a
	Electronic Court Records			18.50
	Total Advances			18.50
	Total Current Work			1,768.28

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Page No: 3
Statement Date: 01/31/2021
Account No: 21868-00030
Statement No: 61637

RaPower-3, LLC Receivership

Previous Balance

\$9,201.84

Balance Due

\$10,970.12



136 East South Temple, Suite 1300 Salt Lake City, Utah 84111 (801) 363-5678 Facsimile (801) 364-5678 www.mc2b.com

Wayne Klein RaPower-3, LLC Receivership KLEIN & ASSOCIATES, PLLC P.O. Box 1836 Salt Lake City, UT 84110

Page No: Statement Date: 02/28/2021 Account No: 21868-00030 Statement No: 61897

Donald Reay, Reay Law, PLLP

Fees

00/01/0001		Hours	
02/01/2021 MML	Draft/revise Motion for Summary Judgment; review documents from client and identify exhibits for deposition.	3.70	814.00
02/02/2021 MML	Draft/revise Motion for Summary Judgment arguments on indirect benefit and good faith; draft deposition outline for deposition of Donald Reay.	3.20	704.00
02/03/2021 MML	Draft/revise Motion for Summary Judgment arguments on insolvency and equivalent value; draft deposition outline for Reay and identify exhibits for same.	2.70	594.00
02/09/2021 MML	Revise and finalize Reay deposition outline and Reay Motion for Summary Judgment.	1.40	308.00
02/11/2021 NLR	Locate exhibits for Reay deposition outline and link same to outline; begin manual update of iPro database to reflect Bates numbering of produced documents.	2.00	310.00
DCC	Read e-mail from MMLongson re motion for summary judgment and deposition outline and read attachments re		

2

RaPower	-3, LLC Receivership	Page No: Statement Date: Account No: Statement No:	02/28/2021 21868-00030 61897
	same.	Hours 0.40	140.00
02/12/2021 DCC	Read e-mail from MMLongson re deposition exhibits; letter from Reay re deposition; follow up e-mail excharwith receiver re issues raised.		210.00
02/16/2021 DCC	E-mail exchange with Justin Heideman and Don Reay deposition.	re 0.20	70.00
02/17/2021 DCC	E-mail exchanges with Don Reay and Justin Heideman deposition; e-mail exchanges with receiver re same.	n re 0.20	70.00
02/18/2021 DCC	Read e-mail from Don Reay re issues re deposition; no follow up re same.	ote 0.20	70.00
02/19/2021 DCC	Draft e-mail to receiver re Don Reay deposition; follow e-mail exchanges with receiver re same; e-mail exchanges with Don Reay re same; note tasks and follow up relations.	nges) 140.00
02/22/2021 DCC	Follow up re discovery issues in case.	0.20	70.00
02/23/2021 DCC	Arrange for updated deposition notice to be served.	0.20	70.00
02/26/2021 MML	Correspond with DCCastleberry re document product deposition exhibits.	ion and 0.2°	0 44.00
DCC	Work on exhibits re deposition; review scheduling ord case; e-mail exchanges with CAJones re same.	der in	0 350.00
02/27/2021 DCC	Analyze exhibits to use in deposition; draft follow up re same.	e-mail	0 175.00

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RaPower-3, LLC Receivership		Page No Statement Date Account No Statement No	02/28/2021 0: 21868-00030
For Current Services Rendered Courtesy Discount Net Fees after Courtesy Discount			Hours 17.10 4,139.00 -1,500.00 2,639.00
Recapitulation	on		
Timekeeper	Hours	Rate	Total
David C. Castleberry	3.90	\$350.00	\$1,365.00
Natalie L. Redd	2.00	155.00	310.00
Mitch M. Longson	11.20	220.00	2,464.00
Expenses			
Photocopies			84.60
Computer Research Westlaw			28.32
Total Expenses			112.92
Total Current Work			2,751.92
Previous Balance			\$10,970.12
Balance Due			\$13,722.04



136 East South Temple, Suite 1300 Salt Lake City, Utah 84111 (801) 363-5678 Facsimile (801) 364-5678 www.mc2b.com

ATTORNEY 5

Wayne Klein RaPower-3, LLC Receivership KLEIN & ASSOCIATES, PLLC P.O. Box 1836 Salt Lake City, UT 84110 Page No: 1
Statement Date: 03/31/2021
Account No: 21868-00030
Statement No: 62175

Donald Reay, Reay Law, PLLP

Fees

03/01/2021		Hours	
MML	Review document production for liability waivers sent to Shepard and Freeborn; direct NLRedd re same for use in deposition.	0.70	154.00
DCC	Outline issues for deposition; e-mail exchanges with MMLongson and NLRedd re exhibits for deposition; conference with MMLongson re same; conference with		
	receiver re same.	2.50	875.00
NLR	Locate and provide additional exhibits to DCCastleberry review in preparation for deposition.	0.50	77.50
03/02/2021			
DCC	Prepare for deposition; organize exhibits; e-mail exchanges re exhibits; take deposition of Don Reay; conference with receiver re deposition and re discovery issues.	6.70	2,345.00
NLR	Locate and provide additional exhibit to DCCastleberry for review and use in deposition.	0.30	46.50
03/04/2021 DCC	Analyze privilege issues in case.	1.00	350.00

Statement Date:

2

03/31/2021

RaPower-	3, LLC Receivership	Account No: Statement No:	21868-00030 62175
		F	Hours
03/11/2021 DCC	Read offer of judgment; draft e-mail to receiver re s	ame.	0.20 70.00
03/12/2021 DCC	Read e-mail from receiver re offer of judgment.		0.20 70.00
03/25/2021 DCC	Review e-mail from Reay re various issues; e-mail exchanges with receiver re same; e-mail exchange with MMLongson re discovery issues.	vith	0.60 210.00
03/26/2021 MML	Analyze issues re Reay extension and clawback with DCCastleberry; draft letter response to Reay re claw privilege issues; research re privilege log obligation potential waiver.	vback and	2.60 572.00
DCC	Analyze issues in correspondence from opposing codraft e-mail to receiver; draft e-mail to MMLongson telephone conference with receiver; telephone confewith MMLongson; draft e-mail to opposing counse emails re scheduling order amendment; review emails mMLongson re draft letter response to opposing correview filings in case re schedule.	n; erence l; review ail from	1.10 385.00
	For Current Services Rendered		16.40 5,155.00
	Recapitulation		
Natalie I	. Castleberry 12.30	0 \$350.00 0 155.00	Total \$4,305.00 124.00 726.00
	Expenses		
	Computer Research Westlaw		25.86
	Total Expenses		25.86
	Total Current Work		5,180.86

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Page No: 3

Statement Date: Account No: 03/31/2021 21868-00030

RaPower-3, LLC Receivership

Statement No:

62175

Previous Balance

\$13,722.04

Payments

Payment Received Wayne Klein Receiver for RaPower Check # 03/30/2021

1260

-9,201.84

Balance Due

\$9,701.06



136 East South Temple, Suite 1300 Salt Lake City, Utah 84111 (801) 363-5678 Facsimile (801) 364-5678 www.mc2b.com

Wayne Klein RaPower-3, LLC Receivership KLEIN & ASSOCIATES, PLLC P.O. Box 1836 Salt Lake City, UT 84110

Page No: Statement Date: 01/31/2021 Account No: 21868-00020 Statement No: 61636

Heideman and Associates

Fees

01/04/2021		Hours	
01/04/2021 CAJ	Analyze file received from USDOJ and review Initial Disclosures to determine if it falls within category of files already disclosed and summarize findings for DCCastleberry; load same to Ipro database for review.	0.50	77.50
DCC	Draft e-mail to CAJones re production issues in case; review e-mail from CAJones re same; note follow up needed re same; review e-mail from CAJones re follow up re same.	0.50	175.00
01/05/2021 DCC	Draft e-mail to MMLongson re follow up needed in case re discovery.	0.20	70.00
DCC	Read e-mail from Justin Elswick re discovery issues in case.	0.20	70.00
01/06/2021 MML	Draft/revise Motion for Summary Judgment argument section on indirect benefit.	1.00	220.00
01/07/2021 MML	Legal research re collateral estoppel in receivership and proof of fraudulent scheme context.	1.70	374.00
MML	Draft Motion for Summary Judgment argument on indirect		

RaPower-	-3, LLC Receivership	Page No: Statement Date: Account No: Statement No:	2 01/31/2021 21868-00020 61636
	benefit and actual fraud.	Hours 1.90	418.00
DCC	Draft e-mail to MMLongson re deposition of Heidema conference with MMLongson re issues incase and provinstruction re same; conference with receiver re upcome depositions in case; read follow up emails from MML and receiver re same.	vide ning	280.00
01/11/2021 MML	Review documents produced by Heideman in preparat deposition and for use in Motion for Summary Judgme		660.00
MML	Draft/revise argument on actual fraud in Motion for Summary Judgment.	0.50	110.00
01/12/2021 MML	Review and tag documents in preparation for Heidema deposition and for Motion for Summary Judgment.	an 2.50	550.00
01/13/2021 MML	Research re insolvency argument for deposition and M for Summary Judgment; review documents produced le Heideman re same.		330.00
01/14/2021 MML	Analyze issues re summary judgment and deposition scheduling; research re documents needed in Heidema production.	nn 0.50	110.00
01/15/2021 CAJ	Assist MMLongson with review of Heideman product and tag key files for his review.	tion 0.80	124.00
MML	Draft/revise deposition notices, including 30(b)(6) Notice topics; analyze issues resame with DCCastleberry; find and serve deposition notices; review and analyze issue CAJones re issues with Heideman discovery; pull and Motion for Summary Judgment filed by counsel in refraudulent transfer case.	nalize es with I review	990.00
DCC	Email exchanges with MMLongson re deposition and matters re same; edit and revise Rule 30(b)(6) designated		

3

RaPower-	3, LLC Receivership	Statement Date: Account No: Statement No:	01/31/2021 21868-00020 61636
		Hours	
	arrange for service of same; draft e-mail to receiver re	same. 0.90	315.00
01/19/2021			
MML	Read/analyze motion for summary judgment in Paul Jofraudulent transfer case; begin incorporating same into Receiver's Motion for Summary Judgment against Heideman; direct CAJones re issues with Heideman document production; review documents produced by Heideman for deposition prep; begin drafting deposition outline for Heideman 30(b)(6) deposition; correspond opposing counsel re deposition rescheduling.	on	990.00
CAJ	Analyze Heideman document productions for missing	bates	
	numbered files identified by Wayne Klein; e-mails wi Wendy Paulsen re identification of same; update		
	MMLongson with documents and response.	0.50	77.50
DCC	Read e-mail from Justin Elswick re depositions; read up email from Justin Elswick re depositions; follow up same; read e-mail from MMLongson re same; e-mail exchanges with receiver re same; arrange for amended notices to be sent in case; read discovery requests in conforward same to receiver.	p re	0 420.00
01/20/2021			
MML	Direct CAJones re documents missing in production a review responses from Heideman re same; draft/revise Heideman deposition outline and tag documents for e in same.	e	0 264.00
DCC	Read e-mail from receiver re discovery issues.	0.2	0 70.00
01/21/2021			
MML	Draft/revise summary judgment argument on insolver draft/revise Heideman deposition outline; review doc for use as exhibits in deposition; correspond with opp counsel re deposition scheduling and location.	uments	0 990.00
DCC	Read email from MMLongson to opposing counsel re discovery issues in case; review e-mail from opposing counsel re discovery and e-mail exchanges with receisame.	g	0 105.00

Page No: Statement Date: Account No:

01/31/2021 21868-00020

RaPower-3, LLC Receivership

Statement No:

61636

4

		Hours	
01/22/2021 MML	Draft/revise Heideman 30(b)(6) deposition outline; draft/revise Motion for Summary Judgment; correspond with opposing counsel re deposition location and redaction issues with production.	2.50	550.00
DCC	Read e-mail from receiver re discovery responses.	0.20	70.00
DCC	Read emails from MMLongson re discovery follow up.	0.40	140.00
01/25/2021 DCC	Telephone conference with receiver re expert designations; draft e-mail to MMLongson re same; read e-mail from receiver re expert designation; read e-mail from MMLongson re draft designation and review same; e-mail exchanges and follow up re same.	0.80	280.00
MML	Research re expert disclosure obligations under local rules; draft Rule 26(a)(2) disclosure for Rick Hoffman.	1.40	308.00
01/26/2021 DCC	Read e-mail from Justin Elswick re discovery issues in case; read e-mail from MMLongson re discovery issues in case; review re-noticed depositions in matter.	0.40	140.00
01/27/2021 DCC	Draft e-mail to receiver re expert designation; review response from receiver re same; draft e-mail to MMLongson re same; read e-mail from MMLongson re same; review updated and original notices of depositions; draft e-mail to receiver re depositions.	0.80	280.00
MML	Draft/revise Responses to Defendant's First Set of Discovery Requests; revise Heideman deposition outline.	2.00	440.00
MML	Revise Rule 26(a)(2) disclosure per client comments and direct LLAnderson re service/filing of same.	0.20	44.00
01/28/2021 DCC	Read emails and documents from opposing counsel; e-mail exchanges with receiver re upcoming depositions.	0.50	175.00

RaPower-	-3, LLC Receivership		Page No tement Date Account No tatement No):):	5 01/31/2021 21868-00020 61636
				Hours	
CAJ	Add less redacted e-mail reproductions from to Ipro database in place of prior versions.	Wendy Poulse	en	0.50	77.50
MML	Confer with DCCastleberry re deposition plan Motion for Summary Judgment; direct CAJon documents received from Heideman; draft/rev	nes re new			
	outline for Heideman 30(b)(6).			1.00	220.00
01/29/2021					
MML	Draft/revise summary judgment arguments on	actual fraud.	•	1.20	264.00
DCC	Work on expert designation filing and confere MMLongson re same; read filings in case re d			0.40	140.00
MML	Draft/revise Motion for Summary Judgment a section.	argument		3.00	660.00
	For Current Services Rendered			48.70	11,578.50
	Recapitulation				
Timekee	•	Hours	Rate		Total
	. Castleberry	7.80	\$350.00	\$2	,730.00
-	A. Jones	2.30	155.00		356.50
Mitch M	I. Longson	38.60	220.00	8	,492.00
	Expenses				
	Computer Research Westlaw				149.51
	Total Expenses				149.51
	Total Current Work				11,728.01
	Previous Balance				\$6,486.12
	Balance Due				\$18,214.13



136 East South Temple, Suite 1300 Salt Lake City, Utah 84111 (801) 363-5678 Facsimile (801) 364-5678 www.mc2b.com

TTORNEYS

Wayne Klein RaPower-3, LLC Receivership KLEIN & ASSOCIATES, PLLC P.O. Box 1836 Salt Lake City, UT 84110

Page No: Statement Date: 02/28/2021 Account No: 21868-00020 Statement No: 61896

Heideman and Associates

Fees

02/03/2021		Hours	
MML	Draft/revise Heideman deposition outline and Motion for Summary Judgment.	0.70	154.00
02/05/2021 MML	Draft/revise Receiver's Responses to First Set of Discovery Requests.	0.80	176.00
DCC	Read e-mail from MMLongson re discovery draft.	0.20	70.00
02/09/2021 MML	Revise and finalize draft deposition outline for Heideman 30(b)(6).	1.60	352.00
02/11/2021 MML	Revise and finalize MSJ and deposition outline for DCCastleberry review.	1.00	220.00
NLR	Locate exhibits for Heideman deposition outline and link same to outline.	1.30	201.50
DCC	Read e-mail from MMLongson re motion for summary judgment and deposition outline and read attachments re same.	0.40	140.00

2

RaPower-	3, LLC Receivership	Page No: Statement Date: Account No: Statement No:	02/28/2021 21868-00020 61896
		Hours	
02/12/2021 DCC	Read e-mail from MMLongson re deposition exhibits.	0.20	70.00
02/16/2021 DCC	Telephone conference with receiver re deposition; Read e-mail and attachments from receiver re Heideman deposition; analyze issues and documents for follow up for use as exhibits.		245.00
02/17/2021 MML	Compile additional deposition exhibits based on input client; analyze issues re deposition with DCCastleberry		264.00
NLR	Assist MMLongson with preparation of deposition exh	ibits. 0.73	116.25
DCC	Prepare for deposition of Heideman; arrange and organ exhibits re same; conference with MMLongson re same review and analyze motion for summary judgment and notes for follow up re issues re same; e-mail exchanges upcoming deposition with MMLongson and with Ways Klein; follow up e-mail exchanges with MMLongson re exhibits; email exchange with Justin Elswick re depositelephone conference with Wayne Klein re issues in carconference with MMLongson re discovery responses; exchange with receiver re discovery responses.	e; make s re ne re ition; se;	0 1,575.00
02/18/2021 NLR	Search for copy of e-mail mentioned within Heideman deposition within iPro database and provide status of s MMLongson.		0 77.50
MML	Search for and correspond with DCCastleberry re engagement documents referenced in Heideman depos finalize and direct LLAnderson to serve discovery rest to Heideman.		0 220.00
DCC	Prepare for deposition of Heideman; take deposition of Heideman; travel related to same; conference with rec same; conference with MMLongson re deposition exh conference with MMLongson re discovery responses; e-mail re discovery responses.	eiver re ibits;	2,800.00

Statement Date: Account No: 3

02/28/2021 21868-00020

RaPower-	3, LLC Receivership	Account No: Statement No:	61896
		Hours	
02/19/2021 DCC	Read filing re designated experts; legal research re poten defenses in case.	ntial 0.90	315.00
02/22/2021 DCC	Review filings in case and previous orders on motion to dismiss; review legal issues re standing and re claims at issue; Read e-mail from Justin Elswick re supplemental production; conference with receiver re deposition; defedeposition of receiver; read emails from receiver re folloproduction; telephone conference with Receiver re same draft e-mail to receiver re same; review e-mail from receive to expert; legal research re disclosure issues.	end ow up e;	1,435.00
02/23/2021 MML	Phone calls with client and opposing counsel re docume to be produced; revise and produce document index to opposing counsel.	ents 0.90	198.00
DCC	Telephone conferences with MMLongson re discovery issues; read emails between MMLongson and opposing counsel re discovery issues; draft e-mail to opposing co		280.00
02/24/2021 DCC	Telephone conference with receiver re discovery issues e-mail exchangers with MMLongson and opposing coure discovery issues.		140.00
02/25/2021 DCC	Read emails from receiver re facts related to opinions reinsolvency.	re 0.20	70.00
02/26/2021 MML	Correspond with client and opposing counsel re docum production.	nent 0.30) 66.00
DCC	Read e-mail and documents from receiver re expert op draft follow email re same; review follow up e-mail exchanges re same; Read e-mail from Justin Elswick re documents in case; e-mail exchanges with MMLongso documents.	e	0 280.00

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RaPower-3, LLC Receivership		Page No Statement Date Account No Statement No	e: o:	4 02/28/2021 21868-00020 61896
For Current Services Rendered Courtesy Discount Net Fees after Courtesy Discount			Hours 31.25	9,465.25 -1,500.00 7,965.25
Recapitulation	n			
Timekeeper David C. Castleberry Natalie L. Redd Mitch M. Longson	Hours 21.20 2.55 7.50	Rate \$350.00 155.00 220.00		Total ,420.00 ,395.25 ,650.00
Expenses				
Photocopies Color Photocopies Computer Research Westlaw Total Expenses				$ \begin{array}{r} 302.40 \\ 73.50 \\ \hline 81.14 \\ \hline 457.04 \end{array} $
Total Current Work				8,422.29
Previous Balance				\$18,214.13
Balance Due				\$26,636.42



136 East South Temple, Suite 1300 Salt Lake City, Utah 84111 (801) 363-5678 Facsimile (801) 364-5678 www.mc2b.com

Wayne Klein RaPower-3, LLC Receivership KLEIN & ASSOCIATES, PLLC P.O. Box 1836 Salt Lake City, UT 84110

 Page No:
 1

 Statement Date:
 03/31/2021

 Account No:
 21868-00020

 Statement No:
 62174

Heideman and Associates

Fees

00/01/0001		Hours	
03/01/2021 DCC	Prepare for conference call with expert; review and respond to e-mail from Cristian Gomez; conference with call with expert; draft follow up e-mail re same; conference with receiver re discovery issues; legal research re same; e-mail exchange with opposing counsel re same; review order on motion for summary judgment in other cases related to receivership.	1.50	525.00
03/03/2021 DCC	Read and respond to e-mail from opposing counsel re status on document disclosure; read Rule 68 offer; e-mail exchanges with receiver re same.	0.60	210.00
03/04/2021 DCC	Analyze discovery issues in case; e-mail exchanges with receiver re same.	0.70	245.00
03/05/2021 MML	Review and prepare production of flash drive materials to opposing counsel.	1.00	220.00
DCC	E-mail exchanges with MMLongson re document production; review email from receiver re discovery follow up; e-mail exchange with Justin Elswick.	0.70	245.00

Statement Date:

Account No:

2

70.00

0.20

03/31/2021

21868-00020

RaPower-3, LLC Receivership 62174 Statement No: Hours 03/08/2021 **DCC** Read e-mail from opposing counsel re status of discovery. 0.20 70.00 03/09/2021 Spot check review documents on final two flash drives MML received from client and direct LEliason re production of 0.50 110.00 same to Heideman. DCC E-mail exchanges with opposing counsel re discovery issues; review e-mail from MMLongson re document disclosures; review follow up e-mail re same. 0.50 175.00 03/10/2021 Coordinate with LEliason and MMLongson re data transfer **NLR** 46.50 0.30 to counsel. Direct NLRedd re production of documents from additional MML flash drives. 0.30 66.00 **DCC** Review disclosures and documents; draft e-mail to 175.00 MMLongson re same. 0.50 03/11/2021 MML Review/analyze supplemental documents produced by Heideman; update DCCastleberry re same and direct NLRedd re sending same to client. 1.50 330.00 **NLR** Add and organize Third Supplemental Disclosures received from opposing party to iPro database and index of file; prepare FTP transfer of same to client per MMLongson; draft cover letter to accompany delivery of external drive to opposing party. 1.00 155.00 DCC Conference with MMLongson re outstanding discovery issues; e-mail exchanges with MMLongson re same; review follow up e-mail re same. 0.60 210.00 03/17/2021

Read e-mail from receiver re document production.

DCC

3

RaPower-	3, LLC Receivership	Acc	ent Date: ount No: ment No:		/31/2021 68-00020 62174
			Hou	rs	
03/19/2021 DCC	Review file and telephone conferences with rece expert report.	eiver re	0.2	20	70.00
03/22/2021 DCC	Review e-mail and expert report from Cristian C telephone conference with receiver re expert repup e-mail exchanges re report and draft follow usame.	ort; follow	1.:	50	525.00
03/23/2021					
DCC	Review expert report and e-mail from Cristian of telephone conference with Receiver re expert reemail from receiver re expert report; read e-mail receiver re expert issues and potential resolution draft e-mail to receiver re same; review expert is schedule; telephone conference re schedules.	eport; review il from n re same;	1.	60	560.00
03/24/2021					
MML	Research re Rule 26(a)(2) expert obligations; dand finalize expert report pleading and direct C LLAnderson re service of same with FTP files.	AJones and	0.	80	176.00
DCC	Telephone conference re expert report; e-mail exit with receiver re same; e-mail exchanges re experimental provide direction to MMLongson re disclosure served expert disclosure.	ert report;	0	.80	280.00
03/31/2021 DCC	Read e-mail from opposing counsel re expert d draft follow up email to receiver re same; follo exchanges re expert discovery. For Current Services Rendered	•	_	.40	140.00 4,603.50
			15		1,000100
Natalie	C. Castleberry	Hours 10.00 S 1.30 4.10	Rate \$350.00 155.00 220.00	\$3,500 20	<u>otal</u> 0.00 1.50 2.00

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RaPowe	:-3, LLC Receivership	Page No: Statement Date: Account No: Statement No:	4 03/31/2021 21868-00020 62174
	Advances		
03/11/2021	Messenger Services Delivery of flash drives to Wayne Total Advances	e Klein	5.00
	Total Current Work		4,608.50
	Previous Balance		\$26,636.42
	Payments		
03/30/2021	Payment Received Wayne Klein Receiver for RaPow 1260	er Check #	-6,486.12

\$24,758.80

Balance Due

EXHIBIT B-4



36 SOUTH STATE STREET, SUITE 500 SALT LAKE CITY, UTAH 84111 (801) 708-7700

WWW.LONEPEAKVALUATION.COM

INVOICE

PRIVILEGED & CONFIDENTIAL

Federal ID No. 26-2104291

Wayne Klein, Receiver 36 S State Street Suite 500 Salt Lake City, UT 84111

Invoice Date: 02/01/2021

Invoice No. Page No. 22986

Account No.

1481.000

RE: United States v. RaPower-3, LLC, et al.

1,197.00

0.00

Fees

01/12/2021	CGO CGO	Develop, create and modify schedules and analyses Develop, create and modify schedules and analyses; Internal communication; Call with Client				Rate 135.00 135.00	Hours 0.20 8.00	27.00 1,080.00
01/19/2021	CFO	Vehicle Title App For Current Serv	90.00	9.20	90.00			
		Timekeeper Chelsea Fox, A Cristian Gomez		Hours - Summary	Hours 1,00 8.20	_ <u>Total</u> \$90.00 1,107.00		
		Total Current Work						1,197.00
		Previous Balance						\$1,035.00
		Balance Due						\$2,232.00
		0-30	31-60	Aged Due Amount	s 91-120	121-180	<u> 181+</u>	

630.00

405.00

0.00

0.00



36 SOUTH STATE STREET, SUITE 500 SALT LAKE CITY, UTAH 84111 (801) 708-7700

WWW.LONEPEAKVALUATION.COM

INVOICE

PRIVILEGED & CONFIDENTIAL

Federal ID No. 26-2104291

Wayne Klein, Receiver 36 S State Street Suite 500 Salt Lake City, UT 84111

Invoice Date: 03/01/2021

Invoice No. Page No.

23141

Account No.

1481.000

RE: United States v. RaPower-3, LLC, et al.

0-30

4,645.13

<u>31-60</u>

0.00

			Fees				
02/23/2021	CGO RHO	Draft report - Heideman review and edit report			Rate 135.00 382.50	Hours 3.25 0.75	438.75 286.88
02/24/2021	CGO RHO	Draft report; File Review review data with C. Gomez; mak	Draft report; File Review review data with C. Gomez; make edits to his work				
02/25/2021	CGO	Draft report; Review legal and fir	nancial documents		135.00	6.50	877.50
02/26/2021	CGO	Draft report; Review legal and fir For Current Services Rendered	Draft report; Review legal and financial documents For Current Services Rendered				810.00 3,448.13
		Timekeeper Rick Hoffman, Principal Cristian Gomez, Analyst	Hours - Summary	Hours 1.25 22.00	Total \$478.13 2,970.00		
		Total Current Work					3,448.13
		Previous Balance					\$2,232.00
		Balance Due					\$5,680.13
			Aged Due Amounts				

61-90

630.00

91-120

405.00

121-180

0.00

181+

0.00



36 SOUTH STATE STREET, SUITE 500 SALT LAKE CITY, UTAH 84111 (801) 708-7700

WWW.LONEPEAKVALUATION.COM

INVOICE

PRIVILEGED & CONFIDENTIAL

Federal ID No. 26-2104291

Wayne Klein, Receiver 36 S State Street Suite 500 Salt Lake City, UT 84111

Invoice Date: 04/01/2021 Invoice No. 23384 Page No. 1

Account No.

1481.000

RE: United States v. RaPower-3, LLC, et al.

Fees

0010410004			Rate	Hours	
03/01/2021	CGO RHO	Draft report; Review financial and legal documents; External communication prepare for and attend conference call on the case	135.00 382.50	7.50 1.00	1,012.50 382.50
03/02/2021	RHO CGO	conference call with Roger on the valuation Develop, create and modify schedules and analyses (Adjusted	382.50	0.50	191.25
	CGO	Financial Statements) Draft report	135.00 135.00	4.00 0.70	540.00 94.50
03/08/2021	CGO	Draft report; Develop and modify schedules	135.00	6.75	911.25
03/09/2021	CGO	Draft report; Prepare and modify schedules	135.00	6.25	843.75
03/10/2021	CGO	Draft report; Prepare and modify schedules	135.00	2.75	371.25
03/17/2021	RHO	work on report and make edits	382.50	2.25	860.63
03/18/2021	CGO	Draft report	135.00	1.50	202.50
03/19/2021	CGO	Draft report; Modify schedules and analyses	135.00	3.00	405.00
03/20/2021	RHO CGO	work on report and make edits, discuss with Cristian Draft report; Modify schedules	382.50 135.00	1.50 2.75	573.75 371.25
03/21/2021	CGO	Draft report; Create and modify schedules	135.00	2.25	303.75
03/22/2021	CGO RHO LRI	Draft report; Create and modify schedules work on written report and review analysis Internal Conference - Conference with Lone Peak personnel to discuss the engagement and/or coordinate future work activities.	135.00 382.50 130.50	4.50 3.75 0.25	607.50 1,434.38 32.63
	LRI	Quality control of schedules and/or report	130.50	4.83	630.32
03/23/2021	CGO	Draft report	135.00	6.00	810.00

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Wayne Klein, Receiver Account No. 1481.000 RE: United States v. RaPower-3, LLC,				Invoice Da Invoice N Page N		021 384 2		
						Rate	Hours	
	RHO	further review discussion wi		cussion with Rece	eiver,	202.50	4.05	470.40
	SYA	File Review	in Chsuan			382.50 171.00	1.25 0.33	478.13 56.43
	RHO		ll with Cristian, re	eview edits, review	v final report	17 1.00	0.00	00.40
03/24/2021	CGO	Draft report; C	all with Receiver		•	382.50	0.75	286.88
						135.00	1.00	135.00
		For Current Se	ervices Rendered	d .			65.36	11,535.15
				Hours - Summa	DPM			
		Timekeeper		riours - Surmin	Hours	Total		
		Shawn Yates	s, Analyst		0.33	\$56.43		
		Rick Hoffma			11.00	4,207.52		
		Cristian Gon			48.95 5.08	6,608.25 662.95		
		Luke Richins	s, Analysi		3.00	002.53		
		Total Current	Work					11,535.15
		Previous Bala	nce					\$5,680.13
								, , , , , , , , , , , , , , , , , , ,
				Payments				
03/25/2021		Payment rece	ived - Thank you	ı				-1,035.00
		Balance Due						\$16,180.28
Aged Due Amounts								
		0-30	31-60	61-90	91-120	121-180	<u>181+</u>	
	•	11,535.15	4,645.13	0.00	0.00	0.00	0.00	