



October 15, 2022

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

Invoice: 917624
Client: 176390
Matter: 3

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Appeal

Professional Services	\$ 464.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 464.00

PARR BROWN GEE & LOVELESS

Invoice: 917624
 RaPower-3 Receivership
 Appeal

October 15, 2022
 Client: 176390
 Matter: 3

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
8/31/22	JAB	Review supplemental authority; Email Wayne Klein re same	.20	58.00
9/16/22	JAB	Draft letter re supplemental authority; Email Wayne Klein re same	1.40	406.00

TOTAL PROFESSIONAL SERVICES**\$ 464.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Jeffery A Balls	290.00	1.60	464.00
TOTALS		1.60	\$ 464.00

TOTAL THIS INVOICE**\$ 464.00**



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REMITTANCE ADVICE

RE: Appeal

BALANCE DUE THIS INVOICE

\$ 464.00

Please return this advice with payment to:

Parr Brown Gee & Loveless
P.O. Box 11019
Salt Lake City, UT 84147

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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



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P.O. Box 1836
Salt Lake City, UT 84110

Invoice: 917625
Client: 176390
Matter: 4

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Litigation

Professional Services	\$ 22,492.00
Total Costs Advanced	<u>\$.00</u>
TOTAL THIS INVOICE	\$ 22,492.00

PARR BROWN GEE & LOVELESS

Invoice: 917625
 RaPower-3 Receivership
 Litigation

October 15, 2022
 Client: 176390
 Matter: 4

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
7/01/22	JAB	Review deadlines for Matt Shepard matter; Telephone conference with Steven Paul re same	.20	58.00
7/05/22	JOH	Review summary judgment ruling and related email correspondence	.10	37.00
7/05/22	JAB	Email Zachary Zufelt re auction procedures	.10	29.00
7/05/22	JAB	Review order granting motion for summary judgment against Matt Shepard; Email Wayne Klein re same	.20	58.00
7/05/22	MM	Research receiver entitlement to attorney fees from defendant	.90	202.50
7/06/22	JAB	Review correspondence from Sean Jansson; Email Sean Jansson; Email Wayne Klein re same	.30	87.00
7/06/22	MM	Research and draft memo re ability of receiver to recover fraudulently obtained attorney fees	2.70	607.50
7/07/22	MM	Research and draft memo re fraudulent transfer act, good faith exception, and inquiry notice	2.50	562.50
7/08/22	MM	Research Utah Uniform Fraudulent Transfer Act re inquiry notice	1.70	382.50
7/11/22	JAB	Review pretrial order for Lagrand Johnson; Email Wayne Klein re same; Review orders of recusal from Judge Parrish; Email Wayne Klein re same; Review court order setting trial date for Snow/Taylor; Email Wayne Klein re same; Email Sean Jansson re auction; Review quarterly status report; Review correspondence from Wayne Klein re summary judgment against Matthew Shepard; Review order granting summary judgment against Matthew Shepard	1.90	551.00
7/11/22	MM	Research receivership liability good faith exception to Utah Fraudulent Transfer Act	.60	135.00
7/12/22	JAB	Review order vacating trial schedule; Email Wayne Klein re same	.30	87.00
7/12/22	MM	Research and draft memo re recovering attorney fees under the Utah Uniform Voidable Transactions Act	1.30	292.50
7/13/22	JAB	Review order setting hearing for Hadderton, Howell, Tilden; Email Wayne Klein re warehouse property	.20	58.00
7/13/22	MM	Research re receiver's ability to recover attorney fees under Fraudulent Transfer Act	.90	202.50
7/14/22	MM	Research and draft memo re attorney fee recovery under Uniform Fraudulent Transfer act	.80	180.00
7/15/22	JAB	Conference with Max Milavetz	.40	116.00
7/15/22	MM	Draft and revise memo re receiver's ability to recover attorney fees from law firm that represented defendant	5.10	1,147.50
7/18/22	CDL	Telephone conference re Nelson Snuffer summary judgment motion	.80	204.00
7/18/22	MM	Revise memo re ability of a receiver to recover fraudulently transferred attorney fees	3.30	742.50
7/19/22	MM	Revise and submit memo re likelihood of a receiver recovering fraudulently transferred attorney fees	1.60	360.00
7/23/22	JAB	Email Sean Jansson re deposit; Review writ of garnishments	.50	145.00

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Date	Tkpr	Description	Hours	Amount
7/25/22	JAB	Telephone conference with Sean Jansson	.10	29.00
7/26/22	JAB	Conference with Sean Jansson; Email Wayne Klein re same	.40	116.00
7/27/22	JAB	Telephone conference with Alaina Montgomery; Telephone conference with Greg Shepard	1.10	319.00
7/28/22	JAB	Review quarterly status report; Email Wayne Klein re same	.60	174.00
7/29/22	JAB	Email Wayne Klein re Matt Shepard; Draft stipulated dismissal as to Jeron Johnson; Email Jeron Johnson re same; Call Jeron Johnson re same	.50	145.00
8/01/22	JOH	Correspond by email with Jeff Balls re upcoming jury trial	.10	37.00
8/01/22	JAB	Email Wayne Klein re meeting to discuss NSDP; Review NSDP documents	.20	58.00
8/02/22	JAB	Telephone conference with Steven Paul; Email Wayne Klein; Review request for hearing for Hadderton	.60	174.00
8/03/22	JAB	Prepare for hearing; Attend garnishment hearing; Telephone conference with Wayne Klein; Telephone conference with Sean Jansson; Email Sean Jansson; Email Dan Applegate re attorney fees application	1.20	348.00
8/04/22	JAB	Email David Castleberry re attorney fees application; Correspond with Wayne Klein	.10	29.00
8/08/22	JAB	Review and revise motion to sell; Email Wayne Klein re same; File same; Conference with Cynthia Love; Review and revise notice of assignment; Correspond with Dan Applegate re asset searches; Review writ of garnishment for Howell	4.70	1,363.00
8/09/22	JAB	Review garnishment documents for Howell and Tilden; Telephone conference with First National Bank of Wichita Falls re Howell garnishment; Email First National Bank re garnishment; Draft revised discovery responses to NSDP; Correspond with Steven Paul re Howell hearing	2.00	580.00
8/10/22	JAB	Telephone conference with Chase Adams; Prepare for hearing on garnishment; Attend hearing on garnishment	.90	261.00
8/12/22	JOH	Review pleadings and email correspondence; Prepare for and attend meeting with Receiver	1.80	666.00
8/12/22	JAB	Conference with Wayne Klein and Jonathan Hafen; Review documents	2.40	696.00
8/22/22	JAB	Review settlement offer re John Howell; Email Wayne Klein re same; Email Jeron Johnson re dismissal	.40	116.00
8/23/22	JMC	Correspond with Jeff Balls re garnishment and bankruptcy; Review garnishment rule and bankruptcy provisions	.80	280.00
8/23/22	JAB	Review and revise notice of sale for warehouse property; Review and revise litigation status report; Email Wayne Klein re same; Call Jeron Johnson re dismissal; Conference with Joseph Covey re automatic stay; Call and email Shane Luke	2.10	609.00
8/23/22	JAB	Draft complaint against Steven Bowers and Richard Searcy; Email Steve Bowers	1.90	551.00
8/24/22	JAB	Review Searcy settlement agreement and default	.20	58.00

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Date	Tkpr	Description	Hours	Amount
8/24/22	JAB	Review documents for Howell hearing; Review bankruptcy case law; Review 10th circuit case law re UVTA; Attend garnishment hearing before Magistrate Kohler	2.20	638.00
8/25/22	JAB	Telephone conference with court clerk; Attend hearing re garnishment; Email Wayne Klein re same	.80	232.00
8/26/22	JAB	Review correspondence from Geoff Chestnut; Email Dan Applegate re same	.10	29.00
8/29/22	JAB	Review order granting 15th fees application; Email Wayne Klein re same	.10	29.00
8/30/22	JAB	Review order from court re supplemental briefing; Email Wayne Klein re same	.10	29.00
8/31/22	JAB	Review draft summary judgment motion against Nelson Snuffer	.30	87.00
9/06/22	JAB	Call Travis Yandell re garnishment; Telephone conference with Steven Paul; Review documents for Carey Hadderton	1.10	319.00
9/07/22	JAB	Telephone conference with Wayne Klein; Prepare for garnishment hearing; Attend garnishment hearing; Review correspondence from Steven Paul; Email Wayne Klein re order for public sale; Review motion re garnishment from Howell	3.00	870.00
9/08/22	JAB	Conference with Daniel Sorenson re garnishment research; Review correspondence from Steven Paul re Hadderton garnishment; Draft supplemental memorandum in support of motion for summary judgment	3.50	1,015.00
9/08/22	DSS	Review documents to prepare to draft response brief re garnishment of bank account; Meet with Jeff Balls re background questions on draft response; Legal research on issues relating to garnishment of joint bank account; Draft brief re garnishment of joint bank account	3.40	850.00
9/08/22	DSS	Research issue of property inherited during marriage for brief on garnishment; Draft brief on garnishment of joint bank account	1.00	250.00
9/09/22	SMS	Discuss garnishment of joint account issues with Jeff Balls	.20	89.00
9/09/22	JAB	Draft motion for extension of time to file supplemental; Draft supplemental brief re Georgelas; Telephone conference with Shane Luke; Draft stipulate dismissal; Email Wayne Klein re same; Draft response to garnishment brief	6.20	1,798.00
9/09/22	DSS	Continue draft reply brief re garnishment of joint bank account; Revise draft reply brief	1.90	475.00
9/09/22	DSS	Additional research re ownership of assets within a joint account	.40	100.00
9/09/22	DSS	Revise draft brief re garnishment of joint account	1.30	325.00
9/09/22	DSS	Research on Texas law re garnishment of joint bank account	.50	125.00
9/12/22	JAB	Draft supplemental brief	.40	116.00
9/13/22	JAB	Draft supplemental briefs for Randale and LaGrand Johnson; Review supplemental briefs from LaGrand and Randale Johnson; Email Wayne Klein re Hadderton garnishment	6.00	1,740.00
9/14/22	JAB	Attend garnishment hearing; Email Wayne Klein re garnishment	.50	145.00
9/16/22	JAB	Finalize motion to dismiss for Shane Luke	.70	203.00

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Date	Tkpr	Description	Hours	Amount
9/23/22	JAB	Correspond with Daniel Applegate re Brennan; Review correspondence from Wayne Klein re Hadderton; Correspond with Wayne Klein re same	.60	174.00

TOTAL PROFESSIONAL SERVICES**\$ 22,492.00****SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Jonathan O Hafen	370.00	2.00	740.00
Stephen M Sargent	445.00	.20	89.00
Joseph M R Covey	350.00	.80	280.00
Jeffery A Balls	290.00	49.10	14,239.00
Cynthia D Love	255.00	.80	204.00
Daniel S Sorenson	250.00	8.50	2,125.00
Maxwell Milavetz	225.00	21.40	4,815.00
TOTALS		82.80	\$ 22,492.00

TOTAL THIS INVOICE**\$ 22,492.00**



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