

RaPower-3, LLC
Time Detail for Receiver and Klein & Associates
July 1, 2023 to September 30, 2023

Date	Worker	Hours	Rate	Amount	Description	Category
7/3/2023	WK	0.1	250.00	25.00	Reconcile bank and money market account statements.	Financial analysis
7/5/2023	WK	0.9	250.00	225.00	Call with J. Balls re: pre-trial disclosures, pre-trial brief for LaGrand and Randale; whether to dismiss claims, what testimony to prepare, jury instructions; discuss NSDP litigation: mediation, deposition dates; discuss whether to begin collection of judgments against LaGrand and Randale now.	Litigation
7/6/2023	WK	2.5	250.00	625.00	Prepare quarterly financial analysis; review files, search PACER filings, draft and edit status report, send to J. Balls for review.	Status Report
7/7/2023	WK	0.1	250.00	25.00	Deposit and log settlement payment.	Asset Recovery
7/11/2023	WK	0.3	250.00	75.00	Review account statements for Randale & LaGrand; update log; respond to S. Paul (.2); call with DOJ (.1).	Financial analysis
7/12/2023	WK	0.8	250.00	200.00	Call with J. Balls re: mediation with Nelson Snuffer; deposition dates.	Litigation
7/14/2023	WK	1.2	250.00	300.00	Read 10th Circuit ruling on Trudy Shepherd, send comments to DOJ and J. Balls.	Litigation
7/17/2023	WK	0.3	250.00	75.00	Read minute order on Neldon Johnson criminal trial; read order postponing trial; calendar new dates, send comments to DOJ.	Litigation
7/18/2023	WK	0.7	250.00	175.00	Review draft juror questionnaire for LaGrand and Randale trial; create redline; send to J. Balls with comments.	Litigation
7/19/2023	WK	0.8	250.00	200.00	Read mediation documents for NSDP, sign mediation agreement, pay mediation deposit fee, respond to J. Balls; read trial order for trial of LaGrand and Randale Johnson, calendar deadlines.	Litigation
7/20/2023	WK	0.4	250.00	100.00	Review files; identify documents to send to DOJ for collection of Richard Searcy judgment, send to DOJ with comments.	Asset Recovery
7/21/2023	WK	3.6	250.00	900.00	Review files, select documents for DOJ to use in collecting judgments against S. Bowers, C. Snow, H. Battle, J. Bean, J. Clement, K. Hawes, Hampton; emails with J. Shields re: C. Taylor delinquency.	Asset Recovery
7/25/2023	WK	0.9	250.00	225.00	Respond to C. Taylor on settlement payment delinquency; read information from informant on Shepard venture (book and movie).	Asset Recovery
7/26/2023	WK	0.2	250.00	50.00	Log and deposit settlement payments; review property tax notices.	Asset Recovery

7/27/2023 WK	1.9	250.00	475.00	Review files, select documents to send to DOJ for Frandsen collection (.9); review pretrial disclosures for LaGrand and Randale Johnson, create redline and send; begin review of pretrial brief.	Litigation
7/28/2023 WK	3.2	250.00	800.00	Work reviewing trial brief for LaGrand and Randale; create redline; search case files and prior rulings for information to include, send to J. Balls (2.6); index files of assigned judgments to take to storage (.6); deliver to storage (.5 not billed.)	Litigation
7/31/2023 WK	0.5	250.00	125.00	Log and deposit settlement payment; verify accuracy of Ina Newman records on payment status; list delinquencies; email Scott Black on delinquency; update settlement log to show cases assigned.	Asset Recovery
8/1/2023 WK	0.1	250.00	25.00	Reconcile bank and brokerage account statements.	Financial analysis
8/2/2023 WK	0.2	250.00	50.00	Call with DOJ.	Litigation
8/3/2023 WK	2.1	250.00	525.00	Review draft special verdict form and jury instructions, note issues to discuss with J. Balls.	Litigation
8/4/2023 WK	0.7	250.00	175.00	Meet with J. Balls to discuss jury verdict form, jury instructions.	Litigation
8/7/2023 WK	2.2	250.00	550.00	Revise jury verdict form, add details for payments to LaGrand and Randale, send to J. Balls with comments (1.1); read appeals court ruling in Roe (commission recipients), send to DOJ; send comments to J. Balls.	Litigation
8/10/2023 WK	0.1	250.00	25.00	Record, deposit settlement payments.	Financial analysis
8/10/2023 WK	0.2	250.00	50.00	Read deposition designations for LaGrand and Randale trial; respond to J. Balls (.1); read request by Kirton & McConkie attorney to observe mediation, respond to J. Balls (.1).	Litigation
8/11/2023 WK	0.5	250.00	125.00	Review changes to special verdict form and jury instructions for LaGrand and Randale joint trial; respond to J. Balls.	Litigation
8/14/2023 WK	1.3	250.00	325.00	Respond to J. Balls on change in pre-trial hearing date (.1); review Receiver's mediation brief for NSDP mediation; create redline, send to J. Balls (1.2)	Litigation
8/15/2023 WK	0.8	250.00	200.00	Work on litigation status report (.4); review changes to jury instructions requested by S. Paul; call with J. Balls on jury instructions, what strategy to adopt, planned motions in limine (.4).	Litigation
8/16/2023 WK	1.3	250.00	325.00	Work drafting litigation status report; search case dockets in PACER; finish, edit, and revise draft report; send to J. Balls for review.	Status Report

8/17/2023 WK	1.8	250.00	450.00	Read notice of bankruptcy filing by Randale Johnson, NSDP letter with settlement offer for LaGrand Johnson; call with J. Balls re: strategy for moving forward (.7); send DOJ information and documents relating to R. Johnson bankruptcy, summarize history and recent developments, discuss alternative approaches, solicit guidance. (1.1).	Litigation
8/18/2023 WK	0.7	250.00	175.00	Log and deposit settlement payment, respond to C. Taylor; search files for documents relating to court order freezing accounts of Randale and LaGrand; download court filings.	Litigation
8/21/2023 WK	6.2	250.00	1,550.00	Mediation session with Nelson Snuffer (3.8); call with J. Balls re: discussions with M. Skolnick re: mediation (.6); notes of mediation, send summary of mediation and strategy ideas to DOJ (1.8).	Litigation
8/22/2023 WK	2.7	250.00	675.00	Review draft motions in limine, create redlines, send comments to J. Balls (.4); respond to DOJ on NSDP mediation, call with T. Melton on Randale bankruptcy (.5); review filings in Randale Johnson bankruptcy filing; research case law; send Idaho case to J. Balls and T. Melton with analysis; send summary of Randale bankruptcy filings to J. Balls and T. Melton; emails re: strategy (1.8).	Litigation
8/23/2023 WK	2.7	250.00	675.00	Review financial and asset information from LaGrand; research chapter 13 bankruptcy guidelines; read DOJ email re: LaGrand, send instructions to J. Balls; research source of debt for medical device purchased by LaGrand; emails with Parr Brown on trial preparation; research files on sources of reimbursements to LaGrand, compile list of reimbursements to LaGrand for personal reimbursements (2.1); create redlines of jury instructions and verdict form for LaGrand (removing references to Randale); send to J. Balls with comments (.6).	Litigation
8/24/2023 WK	0.1	250.00	25.00	Log and deposit settlement payments; update settlement tracking log.	Asset Recovery
8/28/2023 WK	0.7	250.00	175.00	Read settlement counteroffer for LaGrand Johnson, respond to J. Balls; send summary to DOJ.	Litigation
8/29/2023 WK	1.2	250.00	300.00	Read comments from DOJ on settlement strategy for LaGrand Johnson, respond; review draft pretrial order, create redline, send to J. Balls; revise exhibit showing "badges of fraud," send to J. Balls.	Litigation
8/30/2023 WK	1.0	250.00	250.00	Read L. Johnson opposition to motion in limine, send comments to J. Balls; emails with J. Balls on motions (.8); review trial exhibits, respond to J. Balls; emails with J. Balls on trial (.2).	Litigation
8/30/2023 WK	0.1	250.00	25.00	Log and deposit settlement payments; read bankruptcy notices for McQuerry, Randale Johnson.	Financial analysis

9/1/2023 WK	0.1	250.00	25.00	Reconcile bank account statements.	Financial analysis
9/1/2023 WK	2.6	250.00	650.00	Review J. Balls revisions to litigation status report; create redline and send to J. Balls with comments; read court order re: status conference (.3); download bankruptcy filings by Randale Johnson; review statement of financial affairs, lists of assets, liabilities and creditors; send bankruptcy filings to J. Balls with comments.	Litigation
9/5/2023 WK	1.2	250.00	300.00	Read court orders on three Receiver motions in limine for LaGrand Johnson trial, send comments to J. Balls (.4); review Receiver draft trial brief, create redline, send to J. Balls with suggestions (.8).	Litigation
9/6/2023 WK	3.5	250.00	875.00	Search files for information on stock sales by LaGrand Johnson and prices at the time of sale; create exhibit; send summary to J. Balls with exhibits (3.1); call with DOJ (.4).	Litigation
9/6/2023 WK	0.5	250.00	125.00	Work drafting assignment agreement and motion to assign 6 judgments (from appeal) to DOJ.	Asset Recovery
9/7/2023 WK	0.5	250.00	125.00	Read court order on juror questionnaires and hearing; respond to J. Balls.	Litigation
9/7/2023 WK	3.0	250.00	750.00	Finish motion to assign judgments, send to DOJ with comments (.6); read settlement offer for LaGrand Johnson, send comments to J. Balls (.2); research files; draft settlement offer for LaGrand Johnson, send to J. Balls with comments (1.3); draft motion to approve settlement agreement and proposed order (.9).	Asset Recovery
9/8/2023 WK	1.0	250.00	250.00	Revise settlement agreement; review promissory note and property trust agreement, send to J. Balls with comments (.3); call with J. Balls re: settlement with LaGrand, timetable for payments, what security to require (.2); review changes to settlement agreement requested by LaGrand Johnson, sign final agreement; revise and edit motion to approve settlements and proposed order, send to J. Balls with comments (.2); review email from judge on settlement, review draft notice of settlement; respond to J. Balls (.3).	Asset Recovery
9/9/2023 WK	0.4	250.00	100.00	Revise proposed order approving settlement to add language about turnover of bank accounts, send to J. Balls with comments; create list of payments made by Scott Black, send payoff amount, read response.	Asset Recovery
9/11/2023 WK	0.9	250.00	225.00	Participate in court hearing on settlement with LaGrand Johnson; discussions with J. Balls; send summary of hearing to DOJ; respond to S. Paul on language to include in court order to facilitate transfer of accounts.	Litigation

9/11/2023 WK	1.4	250.00	350.00	Review account statements for LaGrand Johnson, respond to S. Paul re: need to keep sending copies of Randale Johnson account statements; review newly delivered account statements for Randale Johnson, update logs (.6); search files on Roger Hamblin, revise assignment agreement to reflect special conditions re: Hamblin's death, send to DOJ (.8).	Asset Recovery
9/12/2023 WK	2.1	250.00	525.00	Download filed copy of motion to approve LaGrand settlement; update tracking log (.2); attend bankruptcy debtor exam proceeding for LaGrand Johnson, ask questions (.6); gather information on assets owned by Randale Johnson and his trust; send information to bankruptcy trustee as to assets, authority of receiver, and balances of frozen bank accounts; request divorce decrees from bankruptcy counsel (1.3).	Asset Recovery
9/14/2023 WK	0.1	250.00	25.00	Check court docket; check Wells Fargo account for receipt of settlement payment; respond to S. Paul confirming pending payment.	Asset Recovery
9/15/2023 WK	0.5	250.00	125.00	Check Wells Fargo, send S. Paul confirmation that payment was received; log deposit; email J. Balls on funds receipt; transfer funds to savings; respond to Randale bankruptcy trustee.	Asset Recovery
9/19/2023 WK	1.1	250.00	275.00	Review offer to purchase HD 3511 property; record settlement payments, update log; review money market confirmation; read divorce orders for Randale J. divorce, respond to D. Hines; forward to J. Balls with comments; send divorce orders to DOJ with comments.	Asset Recovery
9/20/2023 WK	3.1	250.00	775.00	Review files, gather information for bankruptcy trustee for Randale Johnson bankruptcy, send to trustee with documents; search tax court records, send tax court information to trustee and DOJ (2.8); call with J. Balls re: Glenda Johnson deposition, collectability issues, pro se status (.3).	Litigation
9/25/2023 WK	0.2	250.00	50.00	Deposit settlement payments, update tracking log; check PACER docket re: settlement approval.	Asset Recovery
9/27/2023 WK	0.3	250.00	75.00	Search docket for Federal court of claims for new filing by R. Jameson, send results to J. Balls with request to file supplemental notice.	Litigation
9/28/2023 WK	1.4	250.00	350.00	Read bankruptcy notice by Curtis Snow, search bankruptcy docket; review bankruptcy information on Randale Johnson, send to DOJ and J. Balls; log deadlines (.8); review information from bankruptcy trustee for Randale Johnson on house transfer, respond (.6).	Asset Recovery
9/28/2023 WK	0.6	250.00	150.00	Work on status report.	Status Report
Totals	69.6		17,400.00		