

RaPower-3, LLC
Time Detail for Receiver and Klein & Associates
October 1, 2023 to December 31, 2023

Date	Worker	Hours	Rate	Amount	Description	Category
10/2/2023	WK	2.9	250.00	725.00	Reconcile bank statements, prepare financial analysis, finish draft status report; revise & edit, send for filing.	Status Report
10/3/2023	WK	0.1	250.00	25.00	Review and pay invoice for mediator.	Litigation
10/4/2023	WK	1.1	250.00	275.00	Deposit settlement payment, update log settlement log (.1); read Randale Johnson trust agreement, respond to bankruptcy trustee with suggested documents to request from D. Nelson (.2); call with DOJ (.3); revise motion to assign judgments and assignment agreement, send to DOJ (.5).	Asset Recovery
10/5/2023	WK	2.5	250.00	625.00	Read information from D. Hines sent to bankruptcy trustee on Randale home transfer; call with J. Balls; respond to trustee about trust assets and fraudulent transfer claim for home transfer, notes of call; legal research on dischargeability of judgment against Randale Johnson; email to DOJ re: purchasing bankruptcy assets.	Asset Recovery
10/9/2023	WK	2.1	250.00	525.00	Read comments by bankruptcy trustee re: Randale Johnson bankruptcy, respond with analysis and suggested settlement outline; emails to J. Balls on interest calculations; email DOJ on settlement terms (1.3); prepare draft language for settlement with bankruptcy trustee re: Randale Johnson, send to J. Balls for comments, send to trustee (.8).	Asset Recovery
10/12/2023	WK	0.2	250.00	50.00	Download filed status report; record deposits and update settlement logs; send non-payment warning to Christopher Taylor.	Case Administration
10/12/2023	WK	3.8	250.00	950.00	Review draft settlement agreement with trustee for Randale Johnson bankruptcy trustee, create redline, send with comments (1.0); draft motion to approve settlement and proposed order, revise and edit motion and order; send to J. Balls and DOJ with comments (2.8).	Asset Recovery
10/13/2023	WK	0.3	250.00	75.00	Send copies of bank account statements, prior contempt orders, and draft motion for settlement approval to Randale Johnson bankruptcy trustee.	Asset Recovery
10/16/2023	WK	1.0	250.00	250.00	Read email from bankruptcy trustee re: requested changes to Receiver's motion to approve settlement; read draft bankruptcy motion to approve settlement, create redline, send to P. Jones with comments.	Asset Recovery

10/17/2023 WK	4.3	250.00	1,075.00	Download and review bankruptcy filing by Curtis Snow; prepare for section 341 hearing (1.8) participate in 341 hearing, ask questions (.7); notes of hearing, send summary to DOJ (1.1); read revised settlement agreement with bankruptcy trustee for Randale Johnson, revised motion for bankruptcy court approval, proposed order and motion for turnover; send comments to trustee (.7).	Asset Recovery
10/18/2023 WK	0.1	250.00	25.00	Log and deposit settlement payments.	Financial analysis
10/18/2023 WK	0.9	250.00	225.00	Read trustee's draft motion for turnover order for Health Equity funds to be delivered to Receiver, create redline, send redline with comments to trustee (.8); research Utah County property records; make notes of topics to discuss with DOJ (.1).	Asset Recovery
10/20/2023 WK	0.2	250.00	50.00	Read email from DOJ re: collection from Kevin Kerr, respond with support; review new draft motion for Health Equity turnover by trustee, respond.	Asset Recovery
10/30/2023 WK	0.3	250.00	75.00	Record and deposit settlement payments; review and pay property tax; create new log- in for storage unit.	Financial analysis
10/30/2023 WK	0.2	250.00	50.00	Read order approving settlement with LaGrand Johnson; check docket, download motion to approve settlement with Randale Johnson, send to Randale trustee.	Litigation
11/1/2023 WK	0.6	250.00	150.00	Review Snow bankruptcy filings, prepare for call with DOJ; call with DOJ, notes of call; reconcile bank statements.	Asset Recovery
11/6/2023 WK	0.8	250.00	200.00	Check PACER; read email from trustee for Randale Johnson bankruptcy on his motions for approval of settlement; read and sign assignment agreement with DOJ for 5 judgments, send to J. Balls to file (.4); call with lens purchaser, notes of call (.4).	Asset Recovery
11/7/2023 WK	1.7	250.00	425.00	Respond to J. Balls on filing motion for assignment of judgments; read information on Hamblin properties; search county property records (.2); call with J. Balls on searching for Hamblin assets, notes of call (.6); read draft complaint for non-dischargeability of Randale Johnson judgment, calculation of judgment amount, proof of claim; create redlines, send to J. Balls with comments (.9).	Asset Recovery

11/8/2023 WK	3.9	250.00	975.00	Log and deposit settlement payments (.1); search Salt Lake and Washington County property records; review information on Hamblin assets; create spreadsheet showing history of real properties owned by Hamblin (1.8); respond to DOJ on bankruptcy cases, send copy of adversary complaint against Randale Johnson, give update on Curtis Snow bankruptcy and settlement with bankruptcy trustee for Randale (.2); additional searches for properties owned by Hamblin, revise spreadsheet, trace ownership; email J. Balls with results (1.8).	Asset Recovery
11/13/2023 WK	0.5	250.00	125.00	Read filed adversary complaint for non-dischargeability against Randale Johnson, send to DOJ; respond to J. Balls on deposition dates for NSDP and Glenda Johnson litigation; check status of motion to approve settlement; emails with DOJ on Curtis Snow.	Asset Recovery
11/14/2023 WK	0.2	250.00	50.00	Read documents from bankruptcy trustee for Randale (filed motion to approve settlement, exhibits, turnover of funds); calendar hearing date.	Asset Recovery
11/15/2023 WK	1.4	250.00	350.00	Search files for tax opinions by Anderson, Kirton & McConkie, respond to J. Balls (.8); call with Rocky Mountain Air Solutions re: oxygen cylinders leased to Cobblestone and Neldon; notes of call (.6).	Asset Recovery
11/16/2023 WK	1.5	250.00	375.00	Search boxes at storage unit for copies of tax opinions (.5); scan various tax opinions found, send to J. Balls with comments; search CD, find Anderson tax letter, send to J. Balls with explanations (1.0).	Asset Recovery
11/17/2023 WK	0.3	250.00	75.00	Review bankruptcy court docket for Randale Johnson, get copy of discharge order, send to J. Balls and DOJ with query; email J. Balls on turnover of LaGrand Johnson bank accounts.	Litigation
11/20/2023 WK	0.3	250.00	75.00	Return files and box to storage.	Case Administration
11/21/2023 WK	0.8	250.00	200.00	Read order granting motion re: Jameson condition fulfillment; review file, send comments to J. Balls; send order to DOJ with recommendation.	Litigation
11/22/2023 WK	0.2	250.00	50.00	Log and deposit settlement payment; read bank notice of revised deposit, research source of error (due to J. Woodson check error); receive Randale Johnson bankruptcy notice.	Asset Recovery
11/28/2023 WK	0.1	250.00	25.00	Call with J. Balls re: depositions of NSDP and Glenda Johnson.	Litigation
11/29/2023 WK	3.3	250.00	825.00	Download and read order approving assignment of judgments to U.S.; check status of bankruptcies of Randale Johnson and Curtis Snow (.3); search files, gather information on five assigned judgments, send to DOJ with comments about each defendant (3.0).	Asset Recovery
12/5/2023 WK	0.1	250.00	25.00	Reconcile bank and brokerage account statements; emails with J. Balls on filing notices of assignment in individual cases that were assigned.	Financial analysis

12/6/2023 WK	0.4	250.00	100.00	Log and deposit settlement payment (.1); call with DOJ; notes of call (.3).	Litigation
12/7/2023 WK	2.9	250.00	725.00	Read motion by Randale Johnson's bankruptcy attorney to withdraw, respond to J. Balls (.1); call with J. Woodson on payment status; research payments made by Woodson; search Wells Fargo records for Woodson payments and check in incorrect amount, send documents and letter to Woodson (1.0); research files, draft and send letter to Kristine Hamblin with demand for payment; send copy to DOJ (1.8).	Asset Recovery
12/8/2023 WK	0.3	250.00	75.00	Read Randale Johnson answer to adversary complaint; legal research; send answer and comments to DOJ; respond to J. Balls.	Asset Recovery
12/11/2023 WK	0.5	250.00	125.00	Review information on Matt Shepard incarceration and divorce; respond to person with information on incarceration status; review information on status conference for Randale Johnson settlement motion, respond to J. Balls; review information on R. Hamblin, respond.	Asset Recovery
12/12/2023 WK	0.3	250.00	75.00	Read Heideman motion to withdraw in Jameson case; instruct J. Balls to contact widow, send comments to J. Balls on Heideman withdrawal motion.	Litigation
12/13/2023 WK	0.2	250.00	50.00	Call from America First C.U. re: turnover of funds in LaGrand bank account; send email with instructions.	Asset Recovery
12/14/2023 WK	0.1	250.00	25.00	Get returns mail from Kristine Hamblin; record settlement payment.	Asset Recovery
12/14/2023 WK	1.1	250.00	275.00	Read notice of bankruptcy court hearing for Randale Johnson; read court ruling on Heideman motion to withdraw as counsel, send comments to J. Balls; read court approval of Randale Johnson settlement; update log, respond to J. Balls; emails with trustee for Randale Johnson re: bankruptcy court hearing on settlement; email with J. Balls re: meeting with DOJ attorney; ask Lone Peak to print out copies of payments to Glenda Johnson (.6); read DOJ adversary complaint in Snow bankruptcy; respond to DOJ on receiver's proof of claim, UST meeting, bankruptcy court hearing, and settlement approval; call with J. Balls on proof of claim documents and depositions of NSDP (.5).	Litigation
12/15/2023 WK	0.3	250.00	75.00	Email J. Balls re: 30(b)(6) deposition of NSDP (.1); call with C. Gomez at Lone Peak; review files to answer what Glenda Johnson checks to print.	Litigation
12/18/2023 WK	0.1	250.00	25.00	Read email from DOJ re: collection from Kevin Kerr; update tracking log; respond to DOJ; search PACER for status of collection efforts against J. Turner.	Asset Recovery

12/18/2023 WK	1.8	250.00	450.00	Review draft deposition questions for Glenda Johnson deposition; review files; create redline of questions; scan and send documents with additional potential questions; send to J. Balls; get copies of checks of payments to Glenda Johnson, call with J. Balls.	Litigation
12/19/2023 WK	3.2	250.00	800.00	Deposition of Glenda Johnson; discussions with J. Balls about deposition and next steps; emails to Lone Peak re: forensic accounting expert reports.	Litigation
12/19/2023 WK	0.7	250.00	175.00	Court hearing re: Randale Johnson settlement; email trustee.	Asset Recovery
12/20/2023 WK	3.0	250.00	750.00	Emails with bankruptcy trustee and J. Balls re: proof of claim in Randale Johnson bankruptcy (.1); emails with J. Balls re: litigation deadlines for Glenda Johnson, timing for summary judgment (.1); call with DOJ attorney at US Trustee office and investigator re: filings to investigate (.7); find and send documents with comments (.5); review revised draft orders on settlement agreement with bankruptcy trustee; create redlines, send with comments (.9); search files, send information to DOJ attorney on bankruptcy filings by Randale Johnson, Curtis Snow (.7).	Litigation
12/21/2023 WK	0.1	250.00	25.00	Log and deposit settlement payments.	Financial analysis
12/21/2023 WK	2.4	250.00	600.00	List topics to be covered in NSDP Rule 30(b)(6) deposition; create redline of subpoena, send to J. Balls with comments (1.9); read Jameson status report; review file; send comments to J. Balls (.5).	Litigation
12/22/2023 WK	0.1	250.00	25.00	Read letter from Fidelity re: turnover of LaGrand accounts at Fidelity, send comments to J. Balls.	Asset Recovery
12/22/2023 WK	2.3	250.00	575.00	Search for files at storage unit (.5); review files re: Curtis Snow; select and send files to U.S. Trustee relating to Snow conduct, along with comments (1.6); read comments by J. Balls on Jameson status report, respond (.1); review redline of NSDP deposition notice, respond to J. Balls (.1).	Litigation
12/26/2023 WK	1.0	250.00	250.00	Draft letter to Fidelity investments re: account turnover for LaGrand Johnson accounts; research bank availability of signature guarantees; send proposed letter to S. Paul with comments, read response.	Asset Recovery
12/28/2023 WK	0.2	250.00	50.00	Respond to Zions Bank on funds held in accounts of LaGrand and Randale; check court docket; email J. Balls on withdrawing proof of claim in Randale case.	Asset Recovery
12/29/2023 WK	0.1	250.00	25.00	Log and deposit settlement payment; read bankruptcy court order granting discharge to Snow.	Asset Recovery
Totals	56.8		14,200.00		