

# **EXHIBIT B-1**

**RaPower-3, LLC**  
**Time Detail for Receiver and Klein & Associates**  
**October 1, 2019 to December 31, 2019**

Date	Worker	Hours	Rate	Amount	Description	Category
10/1/2019	WK	2.0	250.00	500.00	Finalize, send litigation memo on Gleaves Swearingen; email R. Johnson attorneys and Hale & Wood on status; correspond with Brittain attorney on status; research jurisdiction location for Brittain beneficiaries (.6); obtain, send copies of C. Young commission checks to attorney with comments (.1); get update from M. Lehr on status of pending motions, forward to DOJ; get Rowbotham tolling agreement, respond on request for call; send updated strategic plan to DOJ (.3); read letter from Atwood attorney, draft response, including settlement terms (1.0).	Asset Recovery
10/1/2019	WK	4.4	250.00	1,100.00	Review draft declaration from Pacific Stock Transfer and comments from M. Lehr; prepare redline, send to M. Lehr with comments (.3); discuss with Lone Peak analyst the type of analysis needed from stock sales records; review draft summary and indicate additional analysis to perform (.7); review additional NSDP invoices to identify recoverable payments; input data into spreadsheet (3.4).	Investigation
10/1/2019	WK	0.6	250.00	150.00	Send living allowance payment to G. Shepard (.1); research location of proposed hog farm in relation to Glenda properties, send to Glenda and S. Paul with comments (.5).	Case Administration
10/1/2019	WK	1.4	250.00	350.00	Review and approve draft complaints for five new commission recipients; create redline of Suncore complaint, send with comments (.9); respond to J. Balls on approach to providing required initial disclosures (.5).	Litigation
10/1/2019	JS	0.3	120.00	36.00	Post information on receivership website about two property sales in Millard County.	Case Administration
10/2/2019	WK	0.5	250.00	125.00	Deposit and log settlement payment from Gregg; sign and send settlement agreement and confirmation of receipt; emails with S. Virkus on finality of settlement (.2); begin gathering data on credit card payments (.3).	Asset Recovery
10/2/2019	WK	2.5	250.00	625.00	List questions to ask Wisdom Farms president, gather documents (1.0); meet with John Kraczek about Wisdom Farms work and equipment built by Wisdom Farms (1.5).	Investigation
10/2/2019	WK	0.5	0.00	0.00	Travel to meeting with Kraczek. (Time not billed.)	Investigation
10/2/2019	WK	0.2	250.00	50.00	Call with lens purchaser on potential for recovery; receive contact information.	Case Administration

10/2/2019 WK	0.3	0.00	0.00	Review and reconcile bank statements. (Time not billed.)	Financial analysis
10/2/2019 WK	0.6	250.00	150.00	Call with DOJ; email M. Lehr with approval on Shepard turnover motion.	Litigation
10/3/2019 WK	4.4	250.00	1,100.00	Read draft declaration for Robert Johnson, send to Attorneys with comments (2.6); work on Discover Card litigation memo (.3); call with attorney for Sorenson, notes of call (.7); begin litigation memo for Chase credit card (.8).	Asset Recovery
10/3/2019 WK	1.5	250.00	375.00	Notes of meeting with John Krazcek (1.2); review summary of stock sales by NSDP created by Lone Peak; notes of more analysis needed (.3).	Investigation
10/4/2019 WK	2.8	250.00	700.00	Gather documents, prepare litigation memo for Capital One, send to Parr Brown (1.0); record and deposit settlement payment (.1); prepare litigation memo for Citibank (1.4); review Ayres hardship affidavit (.3).	Asset Recovery
10/4/2019 WK	2.5	250.00	625.00	Finish analysis and input of NSDP invoices.	Investigation
10/5/2019 WK	1.5	250.00	375.00	Read email from Weston Boyack; review invoices he sent; prepare response; draft settlement agreement.	Asset Recovery
10/7/2019 WK	0.1	0.00	0.00	Receive, log net sales proceeds for HD4612. (Time not billed.)	Asset Disposition
10/7/2019 WK	4.4	250.00	1,100.00	Read tolling agreement for Kontos, send reply; revise strategic litigation plan; revise settlement agreement for Neven, send with comments (.4); finish and send analysis of Ayres hardship affidavit; prepare and send settlement agreement; draft and send demand to R. Roehm (.6); call with J. Teakell (.7); email Parr Brown on service of process for 4 Teakell clients; prepare tolling agreement for J. Couch, send tolling and other document to Teakell (.3); revise litigation plan; review email from attorney for C. Young on extended payment plan; research amount of Shepard claim with FBI on options scam; send request to FBI (.7); read settlement offer from attorneys for Nelson Snuffer; sort spreadsheet data showing NSDP invoices, draft detail response (1.7).	Asset Recovery
10/7/2019 WK	1.6	250.00	400.00	Planning meeting with M. Lehr on litigation approach (.8); review draft initial disclosures for Randale Johnson, create with redlines, send to J. Balls with comments (.3); read draft reply to Receiver's motion to dismiss counterclaims, create redline; send Heideman litigation memo to D. Castleberry (.5).	Litigation

10/8/2019 WK	4.5	250.00	1,125.00	Finalize and send letter to M. Skolnick rejecting settlement offer; read Receiver reply in support of motion to transfer cases; email Parr Brown to get copies of TX complaints filed; prepare tolling agreement for Zeigler, send to Teakell along with copy of Howell complaint; get filed copies of TX filed complaints (.7); discuss with Lone Peak next steps on stock sale analysis (.1); work drafting litigation memo for Nelson Snuffer (3.1); revise, sign and send settlement agreement for Ayres; review information on distribution from Brittain estate, calculate residual of estate, draft settlement agreement (.6).	Asset Recovery
10/8/2019 WK	1.6	250.00	400.00	Calls with M. Lehr and E. Healy-Gallagher on liens and [special project]; notes of call (.7); call with Capital One (.1); call with M. Lehr on [special project]; motion to dismiss for Glenda counterclaim; email DOJ; notes of call; additional call with DOJ, notes of call (.5); draft, send tolling agreement for Capital One, send (.3).	Investigation
10/8/2019 WK	1.0	250.00	250.00	Call with D. Castleberry on sample complaints; absence of conflicts; discuss legal theories to pursue; send sample complaints, key court order (.5); read draft motion to dismiss Glenda counterclaim; read deposition excerpt; create redline, send with comments (.5).	Litigation
10/9/2019 WK	0.3	250.00	75.00	Review Glenda notices to county officials in Millard and Utah counties to change address; send information to DOJ; respond to M. Lehr.	Asset Disposition
10/9/2019 WK	7.1	250.00	1,775.00	Work on litigation memo for Nelson Snuffer (gather exhibits, summarize legal theories) (6.4); draft settlement agreement for S. Atwood, send with comments (.4); respond to G. Shepard on payments from BFS received late; read email from attorney for C. Young, draft and send settlement agreement (.3).	Asset Recovery
10/9/2019 WK	0.2	250.00	50.00	Discuss with Lone Peak stock sales and revenues to NSDP; discuss what graphs to create.	Financial analysis
10/9/2019 WK	0.6	250.00	150.00	Read draft declaration for Receiver's response to Glenda Johnson's motion to dismiss; create redline, sign and send (.2); call with DOJ; emails with M. Lehr on litigation issues (.4)	Litigation

10/10/2019 WK	4.1	250.00	1,025.00	Respond to G. Shepard on endorsing BFS checks; sign and send settlement agreement to C. Young; respond to DOJ on lien on Tower Property; review verification of Glenda bank balances, respond (.7); send email to M. Skolnick on settlement prospects for Nelson Snuffer with detailed analysis (1.2); read email from attorney for C. Young, revise settlement agreement, send (.1); finish litigation memo for suit against Nelson Snuffer, revise and edit (1.6); email and phone call with attorney for B. Sorenson (.2); draft and send settlement agreement (.3).	Asset Recovery
10/10/2019 WK	0.3	0.00	0.00	Copy exhibits for Nelson Snuffer litigation memo; prepare binder. (Time not billed.)	Asset Recovery
10/10/2019 WK	1.2	250.00	300.00	Prepare financial analysis; work on status report.	Status Report
10/10/2019 WK	0.4	250.00	100.00	Emails with M. Lehr on how to respond to request for tolling by Nelson Snuffer (.3); email M. Lehr with list of additional jurisdictions to file notice of receivership (.1)	Litigation
10/11/2019 WK	3.1	250.00	775.00	Read redline showing proposed changes to Sorenson settlement agreement, sign and send (.1); get agreement signed by Sorenson, respond; update settlement table (.2); settlement meeting with Robert Johnson; revise and discuss draft affidavit and proposed settlement terms (1.9); read response from M. Skolnick, respond with explanation of reasons against postponing suit; send summary to M. Lehr; get order appointing conflicts counsel; emails with M. Lehr on collateral issues relating to suit against Nelson Snuffer (.9).	Asset Recovery
10/11/2019 WK	1.6	250.00	400.00	Read information from Wisdom Farms on pickup of prototype equipment; respond; send information to DOJ (.5); review changes to Capital One tolling agreement, notify Parr Brown; update litigation tracking log (.7); read Nelson Snuffer response to Receiver inquiry on stock sales, identify sources of payments for certain invoices; verify that new invoice data is already entered in chart of NSDP invoices (.4).	Investigation
10/11/2019 WK	0.3	250.00	75.00	Review graphs of stock prices stock proceeds to Nelson Snuffer; direct LPV in new way to sort data, how to structure bar charts.	Financial analysis
10/11/2019 WK	3.2	250.00	800.00	Work on status report.	Status Report
10/11/2019 WK	0.9	250.00	225.00	Read M. Lehr comments on request by Nelson Snuffer for tolling agreement, revise Receiver's draft response; get order reappointing receiver, send for web posting (.4); read Glenda Johnson opposition to turnover motion, make notes for reply (.5).	Litigation
10/12/2019 WK	4.0	250.00	1,000.00	Work drafting status report.	Status Report

10/14/2019 WK	1.0	250.00	250.00	Call with attorney for Brittain, revise settlement agreement to include one beneficiary, exclude others (.7); get signed settlement agreement from Ayres, revise logs (.1); begin email to DOJ summarizing results of trip to Delta (.2).	Asset Recovery
10/14/2019 WK	6.2	0.00	0.00	Travel [on special project] (4.6); [special project]; return rental car (1.6). (Time not billed.)	Investigation
10/14/2019 WK	1.3	250.00	325.00	[Special project] (.7); call with E. Healy-Gallagher on [special project], Robert Johnson settlement alternatives (.4); notes of meeting [on special project] (.2).	Investigation
10/14/2019 WK	0.6	250.00	150.00	Work drafting status report.	Status Report
10/14/2019 WK	1.8	250.00	450.00	Read draft complaints on Taylor and Snow, create redlines, send to M. Lehr with comments (.8); respond to M. Lehr on strategy for seeking additional time to file turnover reply and appeal brief; instructions for allegations against Gary Peterson; send supplemental information on Hamblin litigation request (.5); read and approve 10 draft commission recovery complaints, authorized filing (.5).	Litigation
10/15/2019 WK	0.2	250.00	50.00	Identify, scan and send Brittain information to Parr Brown for litigation (.1); revise settlement agreement for Bryan Brittain, send to attorney with comments (.1).	Asset Recovery
10/15/2019 WK	3.9	250.00	975.00	Send additional information to Church of Jesus Christ on new lawsuits and motions (.1); draft tolling agreement for Powhatan school district, respond to attorney (.4); work [on special project] (3.4).	Investigation
10/15/2019 WK	0.7	250.00	175.00	Receive, deposit and log settlement payments and property sale proceeds; respond to Carranza on automatic payments (.2); review chart of Nelson Snuffer stock sale proceeds; note changes to format (.5).	Financial analysis
10/15/2019 WK	0.2	250.00	50.00	Begin editing status report.	Status Report
10/15/2019 WK	0.6	250.00	150.00	Research information on payments from Robert Johnson to Neldon Johnson; finish email to DOJ (.5); review new complaints on Taylor and Snow, give approval to file (.1).	Litigation
10/16/2019 WK	0.1	250.00	25.00	Call with T. Belchak on availability of property owned by Glenda Johnson.	Asset Disposition

10/16/2019 WK	3.2	250.00	800.00	Read signed settlement agreement with C. Young, respond; notify Parr Brown; update settlement and litigation logs (.1); call with attorneys for Rowbotham; send spreadsheet & hardship affidavit; notes of call (.8); respond to J. Balls on whether to seek recovery from Woodson for Powhatan Athletics (.1); get settlement agreement for Bryan Brittain, sign and send with directions on timing of payments (.1); get filed complaint on Snow; send information to J. Balls on Woodson; review and approve draft complaints on Zeigler, Turner, Kerrs (.5); read letter from M. Skolnick, draft detailed response; send to M. Lehr with comments (1.6).	Asset Recovery
10/16/2019 WK	5.1	250.00	1,275.00	Compile [special project] (5.0); email [on special project] (.1).	Investigation
10/16/2019 WK	0.8	250.00	200.00	Call with DOJ.	Litigation
10/17/2019 WK	2.5	250.00	625.00	Review proposed changes to Atwood settlement agreement, respond identifying additional information needed to agree to change (.2); review ten draft commission complaints, send comments and approve filing (.4); review draft complaint on Hamblin (.4); revise settlement agreement for Atwood, send (.3); send revised offer of settlement terms to Robert Johnson (.4); discuss with C. Gomez check deposits by Digital Wave Energy; send redline of complaint and comments to M. Lehr, authorize filing (.5); get new filed complaints, send copy of Zeigler complaint to attorney, send litigation recommendation on J. Couch (.3)	Asset Recovery
10/17/2019 WK	5.4	250.00	1,350.00	Select and copy documents from [special project] (1.8); [special project] (.6); [special project] (3.0).	Investigation
10/17/2019 WK	0.3	250.00	75.00	Record deposits of settlement payments; update logs; send acknowledgement to Sorenson attorney (.1); discuss with Lone Peak analyst changes to chart showing Nelson Snuffer stock sales (.2)	Financial analysis
10/17/2019 WK	0.1	250.00	25.00	Read filed answer to complaint by L. Williams.	Litigation
10/18/2019 WK	0.2	250.00	50.00	Get signed settlement agreement for Atwood, respond and update logs (.1); review and sign settlement agreement for Neven (.1).	Asset Recovery
10/18/2019 WK	6.1	250.00	1,525.00	Work on [special project].	Investigation
10/18/2019 WK	0.4	250.00	100.00	Review answers to complaints by Kulacz and 6 others, send comments to Parr Brown (.3); read court order transferring cases against LaGrand, Randale, Bowers, M. Shepard, Glenda, and Ina to Judge Nuffer (.1).	Litigation
10/19/2019 WK	3.4	250.00	850.00	[Special project]	Investigation
10/19/2019 WK	0.7	250.00	175.00	Revise and edit draft status report.	Status Report
10/21/2019 WK	0.4	250.00	100.00	Read inquiry about easement on Texas property; call with agent; send information and explanation.	Asset Disposition

10/21/2019 WK	0.5	250.00	125.00	Read M. Lehr suggested additions to Receiver response to NSDP settlement offer; call with M. Lehr; revise and send response to M. Skolnick.	Asset Recovery
10/21/2019 WK	1.8	250.00	450.00	[Special project].	Investigation
10/21/2019 WK	0.1	250.00	25.00	Log settlement payment; respond to attorney; update logs.	Financial analysis
10/21/2019 WK	0.1	250.00	25.00	Get filed complaints, other court notices, answer by Hutchings; update litigation log.	Litigation
10/21/2019 WK	2.1	250.00	525.00	Review files, gather documents; work revising status report.	Status Report
10/22/2019 WK	1.2	250.00	300.00	Call with M. Lehr on inquiry by M. Skolnick on settlement (.3); read new draft complaints for 4 commission recipients, send additional information, approve filing (.6); read email from W. Boyack on nature of work performed by Wally Boyack, revise and send settlement agreement (.3).	Asset Recovery
10/22/2019 WK	0.3	250.00	75.00	Review revised table by Lone Peak on Nelson Snuffer stock sales.	Financial analysis
10/22/2019 WK	2.3	250.00	575.00	Begin review of box of documents from Pacific Stock Transfer; update list of corporate minutes to include new documents.	Investigation
10/22/2019 WK	1.1	250.00	275.00	Review court notices, motion to transfer cases, extensions of deadlines, new case filings; update litigation plan; get list of tax court cases; send complaint to Couch attorney.	Litigation
10/22/2019 WK	0.6	250.00	150.00	Review file; revise report of property listing to add properties being sought from Glenda, Phillips, Shepard.	Status Report
10/23/2019 WK	3.9	250.00	975.00	Review documents from Pacific Stock Transfer; select records relating to other litigation cases.	Investigation
10/23/2019 WK	2.0	250.00	500.00	Find sample credit card complaints, send to J. Balls with comments (.4); search PACER for copies of new complaints, send updated litigation plan to Parr Brown with comments (.6); call with E. Healy-Gallagher, E. Hines (.8); read Brennan motion to stay litigation, make notes (.2).	Litigation
10/24/2019 WK	0.4	250.00	100.00	Meet with T. Belchak; sign revised aircraft bill of sale; discuss aircraft, property lien filed by Glenda Johnson.	Asset Disposition
10/24/2019 WK	2.8	250.00	700.00	Deposit settlement payment from S. Atwood, send confirmation, update tracking logs (.1); call with attorney for Coates, send copy of complaint, hardship affidavit, and settlement motion (.3); review draft complaint on Jameson, create redline, send to Parr Brown with approval to file (.4); review draft complaint on Monte Hamilton, review files; create redline with changes, send to Parr Brown (2.0).	Asset Recovery



10/24/2019 WK	3.8	250.00	950.00	Perform initial review of credit card records provided by Discover Card; perform initial research on identity of credit card merchants; structure analysis spreadsheet, give directions to Lone Peak for detailed analysis; notify Parr Brown of receipt of records (.7); review spreadsheet of payments to Christopher Taylor, respond to questions by J. Balls (.4); finish reading Aulds deposition (1.8); finish review of documents from PSTC (.9).	Investigation
10/24/2019 WK	0.5	250.00	125.00	Review information [on special project].	Litigation
10/26/2019 WK	1.5	250.00	375.00	Work drafting second motion for approval of settlements; finish draft.	Asset Recovery
10/28/2019 WK	0.1	250.00	25.00	Respond to inquiry on San Bernardino property status; review property tax notices for Millard County properties for 2019.	Asset Disposition
10/28/2019 WK	2.0	250.00	500.00	Extended call with D. Castleberry on issues of standing relating to recovery actions (.6); review draft complaints on Citibank, Plaskolite; review and approve 5 new commission complaints (.9) read draft complaint on G. Peterson, create redline, authorize filing (.5).	Asset Recovery
10/28/2019 WK	0.6	250.00	150.00	Send orders for posting on website; send information to correct tax description on website (.3); call with Millard County Chronicle on new lawsuits filed (.3).	Case Administration
10/28/2019 WK	0.2	250.00	50.00	Get filed complaints for Jameson, Hamilton; get signed tolling agreement for Powhatan School District; update litigation log (.1); read letter from attorney for 3 commission recipients, respond granting additional time (.1).	Litigation
10/28/2019 JS	0.3	120.00	36.00	Post six new court orders on receivership website.	Case Administration
10/29/2019 WK	2.6	250.00	650.00	Find cases on receivership standing in non-Ponzi scheme cases, send to D. Castleberry with comments; send copies of Heideman checks with explanation on different endorsements (.3); call with D. Castleberry on fraudulent transfer issues, status of Receiver's other claims against Glenda Johnson (.2); read draft Heideman complaint; create redline, send to D. Castleberry with comments (.6); read draft complaint against Snell & Wilmer; create redline, send to D. Castleberry with comments (.6); review draft complaints for Brittain, Freeborn, Griffin (.6); review Hawes complaint; create redline, send to M. Lehr with comments (.3).	Asset Recovery
10/29/2019 WK	0.3	250.00	75.00	Email E. Healy-Gallagher on scanning documents from Pacific Stock Transfer, other Receivership Entity documents.	Investigation
10/29/2019 WK	0.2	250.00	50.00	Review preliminary analysis of Discover Card expenditure categories; instruct Lone Peak on changes.	Financial analysis

10/29/2019 WK	0.2	250.00	50.00	Call with J. Teakell on Howell hardship affidavit, status of information gathering for other clients; email Parr Brown to send acknowledgement of service to Teakell.	Litigation
10/30/2019 WK	1.1	250.00	275.00	Call with Texas land agent seeking easement; notes of call; read documents with offer; research amounts paid to NP Johnson trust for prior easements; send inquiry to real estate listing agent.	Asset Disposition
10/30/2019 WK	3.0	250.00	750.00	Gather information on payments by Glenda Johnson to Snell & Wilmer; create spreadsheet showing tracing; compile and send to D. Castleberry with explanation (1.6); review draft complaint on Gleaves Swearingen, respond to M. Lehr; send information to Manning Curtis on transferring Reay case to Manning Curtis (.5); read letter and hardship affidavit for Matt Amidan; draft complaint outlining inconsistencies and identifying asset that could be sold (.9).	Asset Recovery
10/30/2019 WK	0.4	250.00	100.00	Get newly filed complaints; update litigation log; search PACER to identify complaints not yet filed (.3); review file on Reay, send litigation support documents to D. Castleberry.	Litigation
10/31/2019 WK	2.9	250.00	725.00	Review new draft complaints for Heideman, Snell & Wilmer, and Reay; send to D. Castleberry with comments, approve filing (.5); review draft complaint against Nelson Snuffer; review files; prepare redline with extensive suggested revisions, send to M. Lehr with comments (2.2); call with attorney for G. Amidan (.1); call with attorney for Church of Jesus Christ; call with D. Castleberry on Snell & Wilmer complaint (.1).	Asset Recovery
10/31/2019 WK	0.1	0.00	0.00	Deposit settlement payment, update logs (Time not billed.)	Financial analysis
10/31/2019 WK	0.5	250.00	125.00	Verify new case filings, call with M. Lehr on strategy for claims against Nelson Snuffer; case status; call with J. Balls on other potential recovery.	Litigation
11/1/2019 WK	0.6	250.00	150.00	Read email from Weston Boyack; revise settlement agreement, send with comments (.4) analyze hardship affidavit of Thomas Coates, identify areas of inconsistency, list additional information needed (.2).	Asset Recovery
11/1/2019 WK	0.2	0.00	0.00	Send living allowance payment to G. Shepard. (Time not billed.)	Financial analysis
11/1/2019 WK	0.8	250.00	200.00	Download complaints filed against Reay, Heideman, Snell & Wilmer, NSDP; update litigation plan.	Litigation
11/4/2019 WK	1.5	250.00	375.00	Read emails on Bowers hearing; prepare settlement agreement for Bowers, send to J. Balls (.5); read email from attorney for M. Amidan, prepare settlement agreement (.3); research Coates home value, send comments to attorney on hardship affidavit (.7).	Asset Recovery

11/4/2019 WK	0.1	0.00	0.00	Reconcile bank accounts. (Time not billed.)	Financial analysis
11/4/2019 WK	0.8	250.00	200.00	Review changes to status report suggested by M. Lehr; sign revised version, send for filing.	Status Report
11/4/2019 WK	0.1	250.00	25.00	Research elements for attorney lien statute.	Litigation
11/5/2019 WK	0.8	250.00	200.00	Call with land agent on easement for TX property; review files; emails with listing broker; notes of call; respond to broker and oil company on conditions to approve pipeline easement.	Asset Disposition
11/5/2019 WK	0.1	250.00	25.00	Emails with P. Moxley on Robert Johnson settlement, set meeting.	Asset Recovery
11/5/2019 WK	0.2	250.00	50.00	Call with Michael Fletcher on reasons for payment to him; notes of call.	Investigation
11/5/2019 WK	0.1	250.00	25.00	Get filed status report, send for web posting.	Case Administration
11/6/2019 WK	0.3	250.00	75.00	Call with M. Lehr on foreclosure sale of Phillips property; research home.	Asset Disposition
11/6/2019 WK	0.1	0.00	0.00	Review Lone Peak invoices. (Time not billed.)	Financial analysis
11/6/2019 WK	1.8	250.00	450.00	Review draft opposition to Brennan motion to dismiss; create redline, send to M. Lehr with comments (1.2); call with DOJ (.5); email M. Lehr about pending court rulings (.1).	Litigation
11/7/2019 WK	0.2	250.00	50.00	Calls with Texas land agent on easement for Texas property.	Asset Disposition
11/8/2019 WK	1.9	250.00	475.00	Create redline of easement agreement, send to land agent with explanation and list of conditions (.8); review easement documents signed by LaGrand and Randale, send to DOJ; respond to land agent (.1); create W-9, finalize easement, sign and send scanned copies; ask land agent for original of easement documents signed by Randale and LaGrand (.8); read draft notice of trustee sale for Phillips property, respond to M. Lehr on auction date and amount of bid deposit (.1); call with Texas real estate broker on interested party, authorize survey of property; respond to surveyor on payment (.1).	Asset Disposition
11/8/2019 WK	2.3	250.00	575.00	Review hardship affidavit for Coates, note assets that provide possible recovery (.2); meeting with attorneys for Robert Johnson to discuss settlement (1.0); call with John Teakell on Howell financial statements, Palmore settlement offer; notes of call (.5); send email to Coates attorney with settlement offer and list of assets available for payment of settlement (.6)	Asset Recovery
11/8/2019 WK	1.1	0.00	0.00	[Special project]. (Time not billed.)	Investigation

11/8/2019 WK	0.2	250.00	50.00	Get signed settlement agreement for G. Amidan; get filed complaints for attorneys, Freeborn, Griffin, and Brittain; update litigation log.	Litigation
11/9/2019 WK	0.1	250.00	25.00	Read filed answer by Jason Clement, Suncore.	Litigation
11/9/2019 WK	2.3	0.00	0.00	Travel to Payson to view Phillips home, neighborhood. (Time not billed.)	Asset Disposition
11/11/2019 WK	4.7	0.00	0.00	[Special project]. (Time not billed.)	Investigation
11/11/2019 WK	1.6	250.00	400.00	Call with J. Balls on categories of documents to disclose in Ina, Glenda litigation (.2); emails to DOJ on notice to submit; read filed notice (.1); make list of additional documents in possession of receiver that are available for discovery; finish and send list to J. Balls (1.3)	Litigation
11/12/2019 WK	2.8	0.00	0.00	[Special project]. (Time not billed.)	Investigation
11/12/2019 WK	0.3	250.00	75.00	Respond to M. Lehr on subpoena attachment for Capital One; send to Capital One electronic version of receiver demand letter and spreadsheet list of payments; read Dun & Bradstreet notice, Wisconsin revocation notice.	Investigation
11/12/2019 WK	0.2	250.00	50.00	Record settlement payment; review Manning Curtis invoices, send comments/thanks for waived fee amount.	Financial analysis
11/12/2019 WK	0.1	250.00	25.00	Review files; respond to Parr Brown approving taking defaults; discuss discovery document list with Parr Brown.	Litigation
11/13/2019 WK	0.5	250.00	125.00	Read email from Weston Boyack; revise settlement agreement, send to Boyack with explanation (.4); emails with Glenda Johnson on getting copies of bank statements; review bank statements, respond (.1).	Asset Recovery
11/13/2019 WK	1.1	0.00	0.00	[Special project.](Time not billed.)	Investigation
11/13/2019 WK	3.0	250.00	750.00	Read draft appeal brief; review files; create redline, send to M. Lehr with comments (2.4); call with DOJ (.6).	Litigation
11/14/2019 WK	1.8	0.00	0.00	[Special project]. (Time not billed.)	Investigation
11/14/2019 WK	1.7	250.00	425.00	Respond to T. Dennis on appeal brief; emails with M. Lehr on brief; send brief for web posting (.3); respond to K. Ardell with copy of complaint, information about lawsuit (.1); review information from Badway on Coates hardship, respond (.7); review information from Ardell, respond (.2); respond to attorney for Hale & Wood, Weston Boyack, Robert Johnson; read information from Texas land agent on getting original easement documents (.4).	Litigation
11/15/2019 WK	2.1	250.00	525.00	Review Lone Peak summary of Neldon Johnson stock sales, discuss changes to graph; research dates of events tied to stock price movement (1.6); review information from Korry Ardell on sale of plasma cutter to Cobblestone (.3); prepare table showing [special project](.2).	Investigation

11/15/2019 WK	1.7	0.00	0.00	[Special project]. (Time not billed.)	Investigation
11/15/2019 WK	0.4	250.00	100.00	Call with M. Lehr re: Nelson Snuffer counsel; respond to P. Moxley on R. Johnson settlement status; emails with Parr Brown on strategy meeting, waiving conflicts for judge's credit card account, Hale & wood attorneys.	Asset Recovery
11/18/2019 WK	1.7	250.00	425.00	Identify documents to use in contempt hearing; make list of indicators of contempt, topics to address; email company to arrange document imaging; prepare boxes for imaging.	Investigation
11/18/2019 WK	0.1	250.00	25.00	Read final notice of trustee sale for Phillips property; respond to lens purchaser Cabadas.	Case Administration
11/18/2019 WK	0.3	250.00	75.00	Read Shepard opposition to motion for turnover of home; make notes of issues to address in response.	Litigation
11/18/2019 JS	0.1	120.00	12.00	Post on website brief for appellee in appeal.	Case Administration
11/19/2019 WK	1.9	250.00	475.00	Work identifying documents to use at contempt hearing (1.7); tender documents for imaging, explain how documents should be imaged and numbered (.2).	Investigation
11/19/2019 WK	0.1	250.00	25.00	Receive and log easement payment from NuStar.	Financial analysis
11/19/2019 WK	0.2	250.00	50.00	Send information on bank accounts seized for preparation of tax returns.	Tax Preparation
11/19/2019 WK	2.2	250.00	550.00	Meeting with Parr Brown to discuss litigation strategy (1.5); draft requests for admission and interrogatories for commission recipients (.7)	Litigation
11/20/2019 WK	0.5	250.00	125.00	Email Gloria Pierce on getting appraisal for TX property; respond to NuStar on payment for easement (.1); get TX property description; research appraiser and send request to appraiser (.4).	Asset Disposition
11/20/2019 WK	1.4	250.00	350.00	Read letter from P. Moxley on Robert Johnson, respond; send summary of agreement terms to DOJ; email P. Moxley on assignment of claims to Receiver (.6); review signed settlement agreements; revise motion to approve settlements; research status of payments (.8).	Asset Recovery
11/20/2019 WK	2.3	250.00	575.00	Read deposition of Lynette Williams; make list of key statements by commission recipients.	Investigation
11/20/2019 WK	3.4	250.00	850.00	Read email from M. Lehr on bank business records declarations, research files, respond with copies of some declarations (.5); work on discovery questions, send to Parr Brown with comments (2.6); read order approving settlements, update settlement log; read order on motion to transfer cases (.3).	Litigation

11/21/2019 WK	1.2	250.00	300.00	Respond to Hinton Battle on receipt of missing payments; draft settlement motion language for Robert Johnson, send to R. Johnson attorneys with inquiry; send draft motion to DOJ with request for approval; send order approving first settlement motion for web posting.	Asset Recovery
11/21/2019 WK	0.1	250.00	25.00	Review IAS corporate renewal record; research Division of Corporations website for prior filings; send to DOJ.	Investigation
11/21/2019 WK	0.9	250.00	225.00	Email D. Castleberry on discovery requests; review complaint filed against NSDP (.1); meet with D. Castleberry to discuss payments to D. Reay, whether to amend complaint (.4); find cases with rulings on receiver recoveries from attorneys, send to D. Castleberry (.2); review answers filed for four commission recipients (.2).	Litigation
11/22/2019 WK	0.2	250.00	50.00	Respond to inquiry on litigation schedules; review invoice for document scanning, pay invoice.	Investigation
11/22/2019 WK	4.4	250.00	1,100.00	Read email from Ryan Davies with his explanation on purposes of payment to him; research history of transactions with him (.5); call with DOJ on approval of settlements in draft motion (.3); review copies of checks to Don Reay, send to D. Castleberry with comments (.3); read draft reply to turnover motion for Glenda Johnson; review Glenda Johnson declaration; create redline of reply, send to M. Lehr with comments (2.7); read draft declaration for Receiver; create redline, sign and send to M. Lehr (.6).	Litigation
11/25/2019 WK	2.4	250.00	600.00	Review revised table of Neldon stock sales; compare to documents in binder; note discrepancies between account statements and confirmation statements; list changes needed.	Investigation
11/25/2019 WK	1.2	250.00	300.00	Read draft affidavit of non-compliance for NSDP-held funds; review files and prior NSDP affidavits; create redline, send to M. Lehr with comments.	Litigation
11/26/2019 WK	1.0	250.00	250.00	Call with TX listing agent on offer for property, discuss need for appraisal; read offer; respond with terms needed for counteroffer.	Asset Disposition
11/26/2019 WK	0.9	250.00	225.00	Discuss with Lone Peak changes to table showing Neldon Johnson stock sales and exhibits for binder; assign tasks for inserting exhibits containing document numbers; add document numbers to index of boxes; replace exhibits for contempt evidentiary hearing with numbered documents.	Investigation

11/26/2019 WK	4.4	250.00	1,100.00	Read order setting evidentiary hearing; make notes of requirements (.2); revise draft affidavit of non-compliance by Receiver on NSDP retention of funds, research prior orders, create redline with changes (1.0); discuss affidavit of non-compliance with M. Lehr (.4); compile list of actions to be taken in advance of contempt hearing; create chart of deadlines (.9); status call with DOJ (.7); call with M. Lehr on contempt hearing (.1); review new changes to affidavit of non-compliance, create redline, finalize, sign & send for filing (.3); read emails with DOJ on rescheduling contempt hearing, respond; read answer to complaint filed by NSDP (.3); begin making list of topics to address in contempt depositions (.1); read draft receiver's reply in support of motion to dismiss counterclaims; create redline, send to M. Lehr with comments (.4).	Litigation
11/26/2019 JS	0.1	120.00	12.00	Post on website order approving settlement agreements.	Case Administration
11/27/2019 WK	1.0	250.00	250.00	Revise index of contempt exhibits; revise comments on documents (.4); [special project] (.6).	Investigation
11/27/2019 WK	4.1	0.00	0.00	[Special project]. [Time not billed.]	Investigation
11/27/2019 WK	2.0	250.00	500.00	Read Glenda Johnson motion to strike Receiver reply on turnover motion, send comments to M. Lehr (.2); read attorney planning meeting report for Clement/Suncore, send comments to J. Balls (.1); read attorney letter requesting extensions of time for Sikich, Brumfield, Kontos; prepare new tolling agreements, send to attorney; email commission recipients having 12/31 tolling agreements indicating need to respond (.7); read counteroffer by T. Coates; review file, respond with extended legal analysis (.8); read emails between DOJ and E. Wall on delay for hearing; emails with M. Lehr (.2).	Litigation
11/28/2019 WK	1.4	250.00	350.00	List topics from DOJ motion for additional contempt sanctions, create list of possible remedies to seek.	Investigation
11/28/2019 WK	0.1	250.00	25.00	Read response by Coates attorney; review case summaries provided by M. Lehr on commission recipients.	Litigation
11/29/2019 WK	0.5	250.00	125.00	Read response from Coates attorney, reply (.3); call with DOJ on hearing date, proposal on process to facilitate vehicle reconciliation with E. Wall.	Litigation
11/29/2019 WK	1.3	250.00	325.00	Work on vehicle reconciliation chart; review DMV files and NPJ declaration; work on spreadsheet summary of vehicles.	Investigation
11/30/2019 WK	2.3	250.00	575.00	Work on vehicle reconciliation summary; analyze NPJ compliance declaration and exhibits; search exhibits for copy of Solstice agreement with Glenda Johnson.	Investigation

12/2/2019 WK	1.2	250.00	300.00	Respond to email from attorney for Coates on proof standards and whether lens program was a security (.3); find cases on personal jurisdiction, send to Coates with comments (.2); read email from J. Becker on surprise at being sued, prepare extended response with explanation (.7).	Asset Recovery
12/2/2019 WK	0.5	0.00	0.00	Go to Utah Division of Corporations to seek certified copy of IAS online renewal; discuss reasons for inability to create certification. (Time not billed.)	Investigation
12/2/2019 WK	2.9	250.00	725.00	Get notice of corporate revocation in Michigan; get notarized copies of easement grants signed by LaGrand and Randale, respond to NuStar; research notary (.2); send background information and request for tracing source of online renewal to Division of Securities (.8); draft questions to use in contempt depositions; research files for references to [special project] (1.9).	Investigation
12/2/2019 WK	0.1	250.00	25.00	Send living allowance payment to G. Shepard; deposit and log receipt of settlement payments.	Financial analysis
12/2/2019 WK	3.4	250.00	850.00	Work compiling spreadsheet identifying vehicles in name of Neldon Johnson for meet and confer; prepare draft letter of explanation to Ed Wall, send to DOJ for review (2.4); call with DOJ on vehicle reconciliation; revise letter and exhibit, send to Ed Wall (.9); read NSDP motion to retain records, make notes of points to make in response (.1).	Litigation
12/3/2019 WK	0.6	250.00	150.00	Read emails from TX listing agent suggesting appraiser; research appraiser background (.1); call with agent on alternative approaches to selling property (.3); send sample motions on private and public sales (.2).	Asset Disposition
12/3/2019 WK	0.3	250.00	75.00	Revise and send letter to J. Becker on reasons for suit (.1); respond to new question by sending hardship affidavit (.1); send summary to Coates on personal jurisdiction (.1).	Asset Recovery
12/3/2019 WK	0.1	250.00	25.00	Reconcile bank statements.	Financial analysis
12/3/2019 WK	4.6	250.00	1,150.00	Send comments to M. Lehr on responding to NSDP motion to retain records, suggest arguments (.8); call with E. Healy Gallagher on implementing order on contempt preparations (.7); work drafting questions for contempt depositions (1.5); emails re: changing dates for contempt hearing, respond to DOJ on availability; read email from M. Skolnick on planned affidavit of non-compliance; call with M. Lehr on strategy (.3); review draft subpoena to G. Peterson, add suggested language, send to DOJ (1.0); read N. Johnson affidavit on sources of funds used by Nelson Snuffer, send comments to M. Lehr (.3).	Litigation



12/4/2019 WK	0.1	250.00	25.00	Call with Texas listing agent on buyer preference for private sale, her task to find additional appraisers, prepare counteroffer.	Asset Disposition
12/4/2019 WK	1.2	250.00	300.00	Read argument and settlement offer by Swenson, respond to J. Balls with reasons Receiver rejects offer (.7); read answer by Stilson, respond to J. Balls (.1); get signed settlement agreement from Wallace Boyack, respond; update motion to approve settlements; emails with P. Moxley on status of Robert Johnson settlement (.2); respond to K. Lawyer on settlement (.2).	Asset Recovery
12/4/2019 WK	0.2	250.00	50.00	Read draft certificate by Division of Corporations, respond with acceptance of adequacy.	Investigation
12/4/2019 WK	1.5	250.00	375.00	Read revised Receiver's affidavit of non-compliance, make changes, sign (.1); read emails on dates for contempt hearing, subpoena to G. Peterson (.1); extended call with D. Castleberry on arguments and defenses raised by Heideman (1.0); find and send information to D. Castleberry on suit against Gleaves, send copies of prior sanctions motion on Heideman; call with M. Lehr (.3).	Litigation
12/5/2019 WK	1.1	250.00	275.00	Call with TX agent on offer price and buyer's concerns; draft and send language for seller's right to cancel (.4); read new contract (.5); send questions to agent on terms needing to be added in purchase contract (.2).	Asset Disposition
12/5/2019 WK	0.7	250.00	175.00	Read emails from K. Lawyer on settlement; prepare settlement agreement, send; email with Church of Jesus Christ re: deadline.	Asset Recovery
12/5/2019 WK	4.0	250.00	1,000.00	Emails with Utah Division of Corporations on getting certificate of status (.3); work drafting questions for depositions on contempt (3.7).	Investigation
12/5/2019 WK	0.2	250.00	50.00	Read Manning Curtis memo on whether Glenda Johnson needs to be indispensable party in Snell & Wilmer lawsuit (.1); call with Ed Wall on additional time for vehicle reconciliation; emails with DOJ (.1).	Litigation
12/6/2019 WK	0.5	250.00	125.00	Review, sign revised purchase agreement for TX sale (.3); send information about property to appraiser Probandt with inquiry on availability (.2).	Asset Disposition
12/6/2019 WK	3.6	250.00	900.00	Analyze whether corporate minutes referenced in NPJ declaration had been delivered to the Receiver (.8) call with US Attorney office on documents coming from Nelson Snuffer; pick up documents, discuss case with US Attorney office (.5); draft deposition questions; send comments and inquiries to DOJ on approach to take (2.3).	Investigation
12/6/2019 WK	0.3	250.00	75.00	Read Receiver opposition to motion to stay by commission recipients; email John Teakell; read letter from Jacqueline Freeborn; send suggestions to Parr Brown on response; respond to DOJ on documents delivered to the US Attorney.	Litigation
12/7/2019 WK	0.4	250.00	100.00	Work revising deposition questions.	Litigation

12/9/2019 WK	1.5	250.00	375.00	Call with TX agent on sequence of tasks (.1); call with agent and buyer on property purchase (.4); copy and send abstract, copies of easement documents with explanation; respond to appraiser (.6); review revised TX purchase agreement, call with agent on signing problems (.4).	Asset Disposition
12/9/2019 WK	1.6	250.00	400.00	Review tax notices for Glenda-owned properties (.1); read final signed settlement agreement with Robert Johnson and his declaration; create assignment form, send signed agreement and assignment form; send list of follow-up items to P. Moxley (1.1); revise motion to approve settlements, send for finalization; additional emails with P. Moxley, M. Johnson (.4).	Asset Recovery
12/9/2019 WK	0.3	250.00	75.00	Work on deposition questions.	Investigation
12/9/2019 WK	0.2	0.00	0.00	Deposit settlement payments, update settlement logs; respond to W. Boyack. (Time not billed.)	Financial analysis
12/9/2019 WK	0.1	250.00	25.00	Review status of settlement payments, send reminders to delinquent targets.	Financial analysis
12/9/2019 WK	0.1	0.00	0.00	Review invoices from Manning Curtis on conflict cases. (Time not billed.)	Litigation
12/9/2019 WK	1.0	250.00	250.00	Prepare tolling agreement extensions for R. Aulds and P. Aulds, send to attorney with provisional agreement to grant more time for response (.4); read order dismissing counterclaim by Randale Johnson; read reply brief on affiliates appeal; send for webs posting (.5); emails with source on existence of evidence that affiliates engaged in tax claims and MLM selling strategies (.1).	Litigation
12/10/2019 WK	0.8	0.00	0.00	Review and sign new TX sales agreement. (Time not billed.)	Asset Disposition
12/10/2019 WK	1.8	250.00	450.00	Revise settlement agreement for K. Lawyer, send with comments (.1); read emails with information on Robert Johnson, respond; draft and send demand letter to ICSID (1.4); review file; read letter from Church re: settlement, send to DOJ with comments (.3)	Asset Recovery
12/10/2019 WK	3.1	250.00	775.00	Finish deposition questions, send draft to E. Healy Gallagher with exhibits (1.9); begin review of supplemental documents from Glenda Johnson and LaGrand Johnson; get copy of check sent from Wisdom Farms, research payor (source of funds); identify reimbursements for LaGrand personal expenses; make list of Solco lens sales (1.2).	Investigation
12/10/2019 WK	0.6	250.00	150.00	Read draft opposition to Glenda motion to strike; create redline, send with comments to M. Lehr (.4); read orders dismissing counterclaims filed by other defendants; read NSDP motion for jury trial; read NSDP reply in support of motion to stay proceedings (.2).	Litigation
12/11/2019 WK	0.8	250.00	200.00	Respond to Church of Jesus Christ with response to settlement proposal.	Asset Recovery

12/11/2019 WK	2.0	250.00	500.00	Work reviewing supplemental document production, create index; send selected documents to DOJ with comments (1.2); review information on new solar energy breakthrough by commercial group (.1); respond to J. Kraczek on potential GE interest in technology (.6); review Glenda Johnson bank statements to verify no withdrawals, respond (.1);	Investigation
12/11/2019 WK	0.4	0.00	0.00	Review Parr Brown invoices. (Time not billed.)	Case Administration
12/11/2019 WK	2.1	250.00	525.00	Review financial records from Don Reay showing where funds were deposited, compare to Receiver records; send inquiry and analysis to D. Castleberry (.8); call with D. Castleberry re: strategy for responding to D. Reay (.2); status call with E. Healy-Gallagher (.8); read news stories on charges against M. Shepard, send to Parr Brown; get filed motion to approve second batch of settlements, send for web posting; respond to P. Johnson on assignment of claims by Robert Johnson; respond to DOJ re: Church contributions (.3).	Litigation
12/12/2019 WK	1.1	250.00	275.00	Review settlement offer from Coates, review file, draft settlement agreement, send with comments (.6); call with Stuart Schulz on client, notes of call (.5).	Asset Recovery
12/12/2019 WK	3.9	250.00	975.00	Read correspondence from ICSID Secretariat, call with M. Lehr; respond to ICSID; send inquiry to Robert Johnson (.4); review of supplemental documents provided by Glenda Johnson, identify additional deposition questions; create index of documents from G. Johnson (2.7); begin review of Randale supplemental documents, including review of videos (.8).	Investigation
12/12/2019 WK	1.1	250.00	275.00	Read Receiver's draft opposition to NSDP motion to retain records, create redline with comments (.5); record ideas on oral argument for Glenda Johnson turnover motion, find supporting documents (.6).	Litigation
12/13/2019 WK	1.0	250.00	250.00	Read response from Church; prepare settlement agreement, prepare tolling agreement; send drafts to Church with comments; direct M. Lehr to send subpoena for Church donation records.	Asset Recovery
12/13/2019 WK	2.1	250.00	525.00	Call with Ed Wall on vehicles he has identified (.5); create new spreadsheet listing additional vehicles and locations identified by Wall; sort by categories of status (1.6).	Investigation
12/13/2019 WK	0.4	0.00	0.00	Meet with J. Hafen on case status. (Time not billed.)	Case Administration

12/13/2019 WK	3.0	250.00	750.00	Send information from J. Teakell to Parr Brown on accepting service for Teakell clients (.1); read Heideman motion to dismiss; make notes of arguments to make (1.5); read email from D. Reay and documents he provided, send analysis and comment to D. Castleberry (.9); read answer by Jacqueline Freeborn, send inquiry to Parr Brown on legal issues; call with M. Lehr on granting extensions of time to Teakell clients (.2); call with J. Teakell on additional time, send directions to Parr Brown (.3).	Litigation
12/13/2019 JS	0.2	120.00	24.00	Post on website three court orders.	Case Administration
12/14/2019 WK	0.8	250.00	200.00	Revise list of documents to use at contempt hearing; draft questions for Neldon Johnson at contempt hearing.	Investigation
12/14/2019 WK	0.4	250.00	100.00	Read Nelson Snuffer motion to intervene, send comments to M. Lehr.	Litigation
12/16/2019 WK	0.5	250.00	125.00	Read engagement agreement for appraiser Probandt, sign and send with comments; call with listing agent for TX property, send inquiry to new potential appraiser; research other potential appraisers, call with B. Beam, send information.	Asset Disposition
12/16/2019 WK	1.8	250.00	450.00	Emails with M. Lehr on strategy for responding to NSDP motion to intervene (.4); read response from Church; review changes to settlement agreement, respond (.2) read response from ICSID on offer of certified letter, reply (.5); review and approve changes to settlement agreement with Church, changes to tolling agreement; sign and send with comments (.1); read information from Matthew Johnson on payments to ICSID; review files, send wiring instructions, send comments (.6).	Asset Recovery
12/16/2019 WK	2.7	250.00	675.00	Send inquiry to Ryan Davies on results of his search for records (.1); work compiling index of files on Randale Johnson flash drive (1.8); begin reading deposition transcript for Kent Hawes (.8).	Investigation
12/16/2019 WK	0.1	0.00	0.00	Deposit settlement payment, revise tracking logs. (Time not billed.)	Financial analysis
12/16/2019 WK	0.7	250.00	175.00	Calls with DOJ on ICSID, intervention, subpoenas to Peterson.	Litigation
12/17/2019 WK	0.6	250.00	150.00	Emails with M. Lehr on foreclosure sale; review files on Phillips property; call on strategy (.5); review proposal by TX appraiser Bumgardner, respond with request for changes (.1).	Asset Disposition
12/17/2019 WK	1.1	250.00	275.00	Review information from M. Johnson on payment to ICSID; read ICSID certification, respond; respond to M. Lehr on Coates settlement (.2); revise litigation log for status of tolling agreements, send update to Parr Brown (.4); get signed settlement agreement and tolling agreement from Church; work on motion to approve settlements (.5)	Asset Recovery

12/17/2019 WK	1.5	250.00	375.00	Work on index of documents from Randale Johnson (.8); read Hawes deposition (.7).	Investigation
12/18/2019 WK	2.7	0.00	0.00	Travel to, attend foreclosure sale for Phillips property. (Time not billed.)	Asset Disposition
12/18/2019 WK	1.0	250.00	250.00	Revise motion for third settlement approval, send to DOJ for review (.1); read documents and explanation from Robert Johnson on money sent to ICSID (.4); call with NuStar Petroleum on request by Glenda Johnson for easement payment, notes of call (.2); revise motion for settlement approval, send to M. Lehr for filing (2); verify receipt of wired funds from Robert Johnson, send confirmation to M. Johnson (.1).	Asset Recovery
12/18/2019 WK	2.4	250.00	600.00	Work on index of Randal Johnson documents and videos; identify and copy portions of video showing evidence of contempt, send to DOJ with comments.	Investigation
12/18/2019 WK	0.6	250.00	150.00	Send vehicle reconciliation analysis for Glenda Johnson vehicles to Steven Paul with list of information requested.	Litigation
12/19/2019 WK	0.1	250.00	25.00	Respond to Robert Johnson attorneys on resolution of dispute.	Asset Recovery
12/19/2019 WK	6.4	250.00	1,600.00	Get screen shot of solar tracking video, send to DOJ with analysis and comments (.8); work on index of documents from Randale; create spreadsheet totaling payments from Randale to Neldon; check for receipt of all documents with Bates numbers (2.8); work preparing deposition questions for Neldon Johnson at contempt hearing (1.9); read Hawes deposition (.9).	Investigation
12/19/2019 WK	0.1	0.00	0.00	Record deposits; update list of settlement payments. (Time not billed.)	Financial analysis
12/19/2019 WK	0.2	250.00	50.00	Respond to lens purchaser with information on recoveries, send copy of order appointing receiver.	Case Administration
12/19/2019 WK	0.8	250.00	200.00	Call with EHG on progress, notes of call; email M. Lehr on position on requested intervention.	Litigation
12/20/2019 WK	4.1	250.00	1,025.00	Finish reading Hawes deposition; copy pages showing elements of securities law applicability (.4); work drafting questions for contempt hearing (3.7).	Investigation
12/20/2019 WK	0.8	250.00	200.00	Review draft reply to Diana Shepard opposition to Receiver turnover motion; create redline, send to M. Lehr with comments and approval to file (.6); call with D. Castleberry on opposition to Heideman motion and strategy with D. Reay (.2).	Litigation
12/21/2019 WK	1.1	250.00	275.00	Work drafting questions for Neldon Johnson for contempt hearing.	Investigation

12/23/2019 WK	2.5	250.00	625.00	Search files on [special project] (.1); revise questions for contempt hearing, send to DOJ with comments (2.4).	Investigation
12/23/2019 WK	0.4	250.00	100.00	Call with M. Lehr, send hardship affidavit forms (.1); email Texas appraiser seeking quote for more limited services (.1); research property tax status for Tower property, verify payment made; email Title company requesting funds held in escrow; discuss need to re-notice Phillips sale (.2).	Asset Recovery
12/23/2019 WK	0.1	0.00	0.00	Deposit and log settlement payments. (Time not billed).	Financial analysis
12/23/2019 WK	0.2	250.00	50.00	Review invoices provided by D. Reay, respond to D. Castleberry on refusing to dismiss Reay individually (.1); read Nelson Snuffer reply on motion to retain records identified in contempt motion (.1).	Litigation
12/26/2019 WK	3.1	250.00	775.00	Read liens filed by Glenda Johnson on properties titled in Glenda's name; compare liens against properties in Millard County; respond to P. Finlinson; research Anstram Energy and Preston Olsen; research notary; send results of investigation to DOJ; send inquiry to P. Olsen (1.5); call with Millard County Recorder to get certified copy of lien (.2); begin reading deposition of John Howell (1.4).	Investigation
12/26/2019 WK	1.2	250.00	300.00	Research address information on Joel Bean, find copies of tax forms for Bean; review draft motion for extension of time to serve complaint, create redline; respond to J. Balls with documents and comments (.5); read motion for extension of time for service on E. Jordan, send comments to J. Balls (.1); read draft opposition to NSDP motion to intervene, create redline; send to M. Lehr and DOJ with comments (.6).	Litigation
12/26/2019 WK	0.4	250.00	100.00	Begin work on status report.	Status Report
12/27/2019 WK	1.1	250.00	275.00	Emails with potential TX appraiser, review qualifications, respond (.2); draft motion and proposed order to appoint three appraisers (.9).	Asset Disposition
12/27/2019 WK	0.4	250.00	100.00	Find information from Howell deposition on ties between Howell, Bean, and Bennet, send to J. Balls with comments; copy testimony showing elements of securities fraud.	Investigation
12/27/2019 WK	0.3	0.00	0.00	Deposit escrow refund from Juab Title (tower site); move excess funds to savings. (Time not billed.)	Financial analysis
12/27/2019 WK	0.1	250.00	25.00	Get notice of RaPower dissolution in NH; read notice of zoning change for property near Payson condo.	Case Administration
12/27/2019 WK	4.2	250.00	1,050.00	Work drafting status report; send list of additional judicial districts where notice was filed to Parr Brown for confirmation.	Status Report
12/27/2019 WK	0.2	250.00	50.00	Read new draft opposition to NSDP motion to intervene, send comments to M. Lehr (.1); read answer filed by R. Stewart (.1).	Litigation

12/30/2019 WK	0.1	250.00	25.00	Call with M. Lehr on motion to appoint appraisers, discuss alternative sale approaches for TX property.	Asset Disposition
12/30/2019 WK	0.2	250.00	50.00	Discuss with Lone Peak payments to OTC Stock Journal; get new address for Joel Bean, notify Parr Brown.	Investigation
12/30/2019 WK	4.9	250.00	1,225.00	Work on status report.	Status Report
12/30/2019 WK	0.6	250.00	150.00	Read DOJ emails with Now CFO; emails with M. Lehr on motion to approve settlements and filing notices to submit; get filed motion to approve third group of settlements; get list of additional judicial districts where receivership notices were filed; read order denying NSDP motion to retain records, send for web posting; send comments to M. Lehr; make notes for contents of status report on contempt motion.	Litigation
12/31/2019 WK	0.4	250.00	100.00	Read Howell deposition.	Investigation
12/31/2019 WK	2.9	250.00	725.00	Work on status report; gather information from files; review contents of court orders.	Status Report
12/31/2019 WK	4.0	250.00	1,000.00	Gather exhibits for contempt hearing; prepare draft report to the court on status of preparation for contempt hearing; send draft report to DOJ with comments.	Litigation
<b>Totals</b>		<b>347.0</b>	<b>78,320.00</b>		

## **EXHIBIT B-2**





January 15, 2020

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

Invoice: 875808  
Client: 176390  
Matter: 1

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Administration of Receivership Estate**

Professional Services	\$ 6,574.00
Less Courtesy Discount	<u>\$ -657.40</u>
Net Professional Services	\$ 5,916.60
Total Costs Advanced	<u>\$ 3,370.26</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 9,286.86</b>

Invoice: 875808  
 RaPower-3 Receivership  
 Administration of Receivership Estate

January 15, 2020  
 Client: 176390  
 Matter: 1

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
10/01/19	MSL	Revise declaration of Pacific Stock Transfer; Provide comments to counsel for Pacific Stock Transfer re revisions to declarations; Communication with court staff re upcoming deadlines; Communication with Wayne Klein re same	1.50	330.00
10/07/19	MSL	Draft reply in support of second transfer motion; Review transfer orders in LaGrand Johnson, Randale Johnson, and Matthew Shepard litigation; Coordinate filing second transfer motion	2.20	484.00
10/08/19	MSL	Communication with Pat Finlinson, Millard County Attorney, re filling liens on properties auctioned by the Receiver; Communication with Wayne Klein re same; Communication with counsel for Pacific Stock Transfer Company re declaration and additional records re International Automated Systems; Research re liens filed on properties the Receiver auctioned in Millard County	2.90	638.00
10/11/19	NM	Research local rules in multiple jurisdictions re miscellaneous action cases	.70	87.50
10/14/19	MSL	Draft notice of receivership pursuant to 28 USC 754; Communication with Jeff Balls and Natalie McKean re filing notices of receivership; Review 28 USC 754 requirements; Compile exhibits for notices of receivership	1.10	242.00
10/14/19	NM	Research local rules in multiple jurisdictions re miscellaneous action filings; Correspond with court clerks re same; Coordinate payment for filing fees; Prepare and file notices of receivership	6.20	775.00
10/15/19	MSL	Review documents provided by Pacific Stock Transfer Company; Communication with Wayne Klein re same; Communication with Jeff Balls re notices of receivership sent for filing to other jurisdictions; Review local rules in multiple jurisdictions re procedure for filing by mail	1.10	242.00
10/15/19	NM	Correspond with several court clerks re local rules and notice of receivership filing	1.50	187.50
10/17/19	MSL	Communication with Jeff Balls and Natalie McKean re notice of receivership in district of DC	.20	44.00
10/23/19	JOH	Review email correspondence and related document from Receiver re various causes of action; Follow up re same	.20	74.00
11/04/19	MSL	Review and revise Receiver's fourth status report; Research re attorney client privilege of invoices from attorneys for status report; Communication with Wayne Klein re same	2.90	638.00
11/05/19	MSL	Finalize fourth status report for filing; Communication with Wayne Klein re same	.60	132.00
11/21/19	JOH	Review email correspondence from potential creditor; Correspond by email with Receiver re same	.20	74.00
12/03/19	MSL	Review Nelson's Snuffer's motion to retain records in its possession; Communication with Wayne Klein re same; Communication with Erin Healy Gallagher and Wayne Klein re hearing dates	.80	176.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 875808  
 RaPower-3 Receivership  
 Administration of Receivership Estate

January 15, 2020  
 Client: 176390  
 Matter: 1

Date	Tkpr	Description	Hours	Amount
12/04/19	JOH	Review draft correspondence to law firm; Correspond by email with and meeting with M. Lehr re same	.20	74.00
12/05/19	MSL	Review letter from Nelson Snuffer re document production; Communication with Jeff Balls re same	.30	66.00
12/16/19	MSL	Telephone and email communication with First American Title company re documents related to Delta property transactions	.80	176.00
12/16/19	MSL	Draft notice of intent to serve subpoena on the Church; Draft subpoena re same; Coordinate service of the notice	.80	176.00
12/17/19	MSL	Telephone communication with First American Title re document production; Review checks written to First American from Nelson Snuffer in 2006; Review properties titled in the name of IAS and Glenda Johnson re same	.70	154.00
12/18/19	MSL	Telephone communication with in-house counsel for First American Title re documents related to property purchases in Millard County, Utah; Email communication with in-house counsel for First American Title re same; Draft response to Wayne Klein re First American documents	1.20	264.00
12/22/19	MSL	Draft proposed order for fee application; Finalize fee application	.70	154.00
12/23/19	MSL	Telephone and email communication with Jeron Johnson re settlement and answer to complaint	.50	110.00
12/27/19	MSL	Communication with Wayne Klein re third motion for approval of settlements	.20	44.00
12/30/19	MSL	Review districts where notice of receiverships were filed after reappointment order; Communication with counsel for the church re subpoena; Review and revise third motion to approve settlements; Draft proposed order re motion to approve settlements; Coordinate filing of third motion to approve settlement; Communication with Wayne Klein re motion to appoint appraisers; Review and revise motion to appoint appraisers; Coordinate filing of motion to appoint appraisers	5.60	1,232.00

**TOTAL PROFESSIONAL SERVICES****\$ 6,574.00**

Less Courtesy Discount

\$ -657.40**NET PROFESSIONAL SERVICES****\$ 5,916.60****SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Jonathan O Hafen	370.00	.60	222.00
Michael S. Lehr	220.00	24.10	5,302.00
Natalie McKean - Paralegal	125.00	8.40	1,050.00
<b>TOTALS</b>		<b>33.10</b>	<b>\$ 6,574.00</b>

## PARR BROWN GEE &amp; LOVELESS

Invoice: 875808  
 RaPower-3 Receivership  
 Administration of Receivership Estate

January 15, 2020  
 Client: 176390  
 Matter: 1

**COSTS ADVANCED**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
10/04/19	SimpleCertified Mail	13.55
10/04/19	SimpleCertified Mail	13.55
10/04/19	SimpleCertified Mail	13.55
10/14/19	Clerk, US District Court Middle District of Alabama - Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court District of Arizona -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court Eastern District of California -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court for the District of Columbia -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court for the Northern District of Florida -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court for the Southern District of Florida -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court Central District of Illinois -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court Western District of Michigan -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court Eastern District of Michigan -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court for the District of Minnesota -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court Northern District of Mississippi -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court Southern District of Mississippi -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court for the District of Nevada -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court Southern District of Ohio -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court Western District of Oklahoma -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court for the District of Oregon -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court Eastern District of Pennsylvania -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court Western District of Texas -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court Eastern District of Virginia -- Miscellaneous Action Filing Fee	47.00
10/14/19	Clerk, US District Court Eastern District of Wisconsin -- Miscellaneous Action Filing Fee	47.00
10/14/19	FedEx, Delivery/Messenger, Middle District of Alabama	52.02
10/14/19	FedEx, Delivery/Messenger, Sandra Day O'Connor US Courthouse	41.01
10/14/19	FedEx, Delivery/Messenger, Robert T. Matsui Federal Court	41.01

## PARR BROWN GEE &amp; LOVELESS

Invoice: 875808  
 RaPower-3 Receivership  
 Administration of Receivership Estate

January 15, 2020  
 Client: 176390  
 Matter: 1

<b>Date</b>	<b>Description</b>	<b>Amount</b>
10/14/19	FedEx, Delivery/Messenger, District of Columbia	55.51
10/14/19	FedEx, Delivery/Messenger, Northern district of Florida	52.02
10/14/19	FedEx, Delivery/Messenger, Wilkie D. Ferguson JR US Court	55.51
10/14/19	FedEx, Delivery/Messenger, 305 U.S. Courthouse	49.96
10/14/19	FedEx, Delivery/Messenger, USDC Western District of Michigan	49.96
10/14/19	FedEx, Delivery/Messenger, Theodore Levin U.S. Courthouse	47.19
10/14/19	FedEx, Delivery/Messenger, Diana E. Murphy US Courthouse	45.17
10/14/19	FedEx, Delivery/Messenger, Thomas G Abernethy Federal Building	53.01
10/14/19	FedEx, Delivery/Messenger, Thad Cochran US Courthouse	49.96
10/14/19	FedEx, Delivery/Messenger, District of Nevada	41.01
10/14/19	FedEx, Delivery/Messenger, USDC Southern District of Ohio	52.02
10/14/19	FedEx, Delivery/Messenger, Western District of Oklahoma	45.17
10/14/19	FedEx, Delivery/Messenger, Mark O. Hatfield Courthouse	45.17
10/14/19	FedEx, Delivery/Messenger, James A Byrne US Courthouse	55.51
10/14/19	FedEx, Delivery/Messenger, Western District of Texas	49.96
10/14/19	FedEx, Delivery/Messenger, Eastern district of Virginia	55.51
10/14/19	FedEx, Delivery/Messenger, Eastern district of Wisconsin	49.96
10/15/19	USDC WD WA - miscellaneous action filing fee	47.00
10/16/19	SimpleCertified Mail	7.45
10/18/19	Clerk, US District Court -- USDC WY	47.00
10/18/19	Clerk, US District Court -- USDC ED TX - Miscellaneous action filing fee	47.00
10/18/19	USDC of Colorado - miscellaneous action filing fee	47.00
10/18/19	FedEx, Delivery/Messenger, District of Wyoming	44.56
10/18/19	FedEx, Delivery/Messenger, Adele McMillan	52.94
10/30/19	Complaint filing fees	400.00
11/14/19	SimpleCertified Mail	7.10
11/14/19	SimpleCertified Mail	7.10
11/14/19	SimpleCertified Mail	7.10
11/14/19	FedEx, Delivery/Messenger, Byron White Court House	57.46
11/15/19	FedEx, Delivery/Messenger, Byron White Court House	48.56
11/15/19	Office of the Utah County Constable LLC -- Posting of Notice of Trustee's Sale	39.00
12/02/19	Utah Media Group - Proof of Publication of Notice of Trustee's Sale	470.00
12/19/19	Court Documents, Millard County Recorder	10.50
12/24/19	SimpleCertified Mail	7.10
12/24/19	SimpleCertified Mail	7.10
12/30/19	Posting of Notice of Trustee's Sale	49.00

**TOTAL COSTS ADVANCED**

**\$ 3,370.26**

**TOTAL THIS INVOICE**

**\$ 9,286.86**



January 15, 2020

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

Invoice: 875809  
Client: 176390  
Matter: 2

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Asset Analysis & Recovery**

Professional Services	\$ 1,970.00
Less Courtesy Discount	<u>\$ -197.00</u>
Net Professional Services	\$ 1,773.00
Total Costs Advanced	<u>\$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 1,773.00</b>

## PARR BROWN GEE &amp; LOVELESS

Invoice: 875809  
 RaPower-3 Receivership  
 Asset Analysis & Recovery

January 15, 2020  
 Client: 176390  
 Matter: 2

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
11/06/19	NM	Draft notice of trustee's sale; Correspond with Mike Lehr re the same	.80	100.00
11/14/19	NM	Finalize notice of trustee's sale; Coordinate the publication and posting of notice on property; Mail notice to interested parties	.60	75.00
12/17/19	JMC	Correspond with Mike Lehr re trustee's foreclosure sale process and procedure	.30	105.00
12/17/19	MSL	Multiple telephone communications with Wells Fargo re mortgage status and amount on Phillips property; Communication with Wayne Klein re Phillips property; Communication with Joe Covey re trustee's sale of Phillips property; Review documents related to trustee's sale such as notice of default and election to sale; Review statute governing trustee's sale; Multiple phone calls with potential bidders for Phillips property	3.70	814.00
12/18/19	MSL	Prepare for, travel to, and conduct trustee's sale for the Phillips property; Communication with Wayne Klein re same	3.30	726.00
12/23/19	NM	Draft trustee's deed; Correspond with Mike Lehr re the same	1.20	150.00

**TOTAL PROFESSIONAL SERVICES****\$ 1,970.00**

Less Courtesy Discount

\$ -197.00**NET PROFESSIONAL SERVICES****\$ 1,773.00****SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Rate</b>	<b>Hours</b>	<b>Total</b>
Joseph M R Covey	350.00	.30	105.00
Michael S. Lehr	220.00	7.00	1,540.00
Natalie McKean - Paralegal	125.00	2.60	325.00
<b>TOTALS</b>		<b>9.90</b>	<b>\$ 1,970.00</b>

**TOTAL THIS INVOICE****\$ 1,773.00**



January 15, 2020

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

Invoice: 875810  
Client: 176390  
Matter: 3

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Appeal**

Professional Services	\$ 14,679.00
Less Courtesy Discount	<u>\$ -1,467.90</u>
Net Professional Services	\$ 13,211.10
Total Costs Advanced	<u>\$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 13,211.10</b>



Invoice: 875810  
 RaPower-3 Receivership  
 Appeal

January 15, 2020  
 Client: 176390  
 Matter: 3

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
10/20/19	MSL	Draft motion for extension of time to file response brief; Communication with counsel for the United States re same	.60	132.00
10/21/19	MSL	Draft and revise motion for extension of time; Review Tenth Circuit rules re motion for extensions; Coordinate filing motion; Communication with Jeff Balls re same	1.70	374.00
11/05/19	MSL	Review Appellants' opening brief and related documents; Research re jurisdiction of appeals court to hear appeal; Communication with Jeff Balls re same	4.50	990.00
11/06/19	MSL	Research re preservation of issues on appeal, the requirements of Rule 4 of the Federal Rules of Civil Procedure, due process requirements and standard, and standard of review in receiverships; Review briefs filed in the district court by XSun and Solco; Draft appeal response brief	6.20	1,364.00
11/07/19	MSL	Review federal rules of appellate procedure; Review the government's response brief in related appeal; Draft statement of the case section in response brief; Draft summary of the argument section in same; Research standard of review for due process claims in receiverships; Research re jurisdictional issues	6.70	1,474.00
11/08/19	MSL	Draft statement in of case section in response brief; Draft jurisdictional statement in response brief; Review the United States' response brief in related appeal	3.80	836.00
11/09/19	MSL	Draft summary of the argument and section re jurisdiction in appeal response brief	2.90	638.00
11/10/19	MSL	Draft jurisdiction section in appellate brief re Nelson Snuffer's lack of authority to appeal on behalf of appellants; Draft personal jurisdiction section; Draft due process standard section; Research re authority required to bring appeal on behalf of an entity; Review federal rules of appellate procedure re parties allowed to bring appeals	7.30	1,606.00
11/11/19	MSL	Research re jurisdiction to bring interlocutory appeal; Draft jurisdiction section; Draft due process argument section; Research re authority required to bring appeal on behalf of an entity; Review federal rules of appellate procedure re parties allowed to bring appeals; Review appellants opening brief	10.10	2,222.00
11/12/19	JOH	Review Tenth Circuit briefs; Correspond by email with Mike Lehr re same	1.10	407.00
11/12/19	MSL	Draft and revise argument section of brief including due process section and preservation section; Communication with Wayne Klein re brief; Review federal rules of appellate procedure re requirements re response brief; Compile record and appendix	9.10	2,002.00
11/13/19	JAB	Revise appellate brief	1.50	435.00
11/13/19	MSL	Draft and revise argument and jurisdiction sections of brief; Communication with Wayne Klein re brief; Review federal rules of appellate procedure re requirements re response brief; Compile record and appendix; Finalize brief for filing; Coordinate filing	8.50	1,870.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 875810  
 RaPower-3 Receivership  
 Appeal

January 15, 2020  
 Client: 176390  
 Matter: 3

Date	Tkpr	Description	Hours	Amount
11/14/19	MSL	Review tenth circuit rules re filing of hard copies with the court; Coordinate filing of hard copies	.50	110.00
11/15/19	JAB	Review letter from 10th circuit; Telephone conference with Michael Lehr	.30	87.00
12/09/19	MSL	Review appellants reply brief; Research re case law cited in brief; Communication with Wayne Klein re same	.60	132.00

<b>TOTAL PROFESSIONAL SERVICES</b>	<b>\$ 14,679.00</b>
Less Courtesy Discount	\$ -1,467.90
<b>NET PROFESSIONAL SERVICES</b>	<b>\$ 13,211.10</b>

**SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Jonathan O Hafen	370.00	1.10	407.00
Jeffery A Balls	290.00	1.80	522.00
Michael S. Lehr	220.00	62.50	13,750.00
<b>TOTALS</b>		<b>65.40</b>	<b>\$ 14,679.00</b>

<b>TOTAL THIS INVOICE</b>	<b>\$ 13,211.10</b>
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January 15, 2020

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

Invoice: 875811  
Client: 176390  
Matter: 4

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Litigation**

Professional Services	\$ 107,035.00
Less Courtesy Discount	<u>\$ -10,703.50</u>
Net Professional Services	\$ 96,331.50
Total Costs Advanced	<u>\$ 23,744.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 120,075.50</b>

## PARR BROWN GEE &amp; LOVELESS

Invoice: 875811  
 RaPower-3 Receivership  
 Litigation

January 15, 2020  
 Client: 176390  
 Matter: 4

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
10/01/19	JAB	Draft complaints against Kelvin Anderson, Raleigh Stewart, Joseph Scraggs, Debbie Smith, and Jason Clement, Edward Kinsey, and Suncore; Conference with Michael Lehr, Jasmine Leonardi and Sierra Taylor; Finalize attorney planning meeting reports; Draft initial disclosures for Randale Johnson, Matthew Shepard, and Lagrand Johnson; Prepare magistrate consent form	5.50	1,595.00
10/01/19	MSL	Conference with Jeff Balls, Sierra Taylor, and Jasmine Leonardi re litigation timing and strategy including scheduling orders and initial disclosures; Research re ultra vires exception to the Barton rule for reply to motions to dismiss in litigation against Randale Johnson, LaGrand Johnson, and Matthew Shepard; Draft section in reply to motion to dismiss re ultra vires exception	6.30	1,386.00
10/01/19	SBT	Meet with Jeffery Balls, Michael Lehr, and Jasmine Leonardi to discuss strategy re RaPower3 filing schedule	.50	105.00
10/01/19	JL	Conference with Jeffery Balls, Michael Lehr and Sierra Taylor re case status and upcoming projects	.50	75.00
10/02/19	JAB	Finalize complaint against Debbie Smith and Jason Clement; Review orders reassigning cases to Nuffer; Conference with Michael Lehr re transfer of lawsuit and law firm claims	2.40	696.00
10/02/19	MSL	Communication with Wayne Klein and Jeff Balls re transfer of cases to Judge Nuffer; Communication with Jon Hafen re suit against law firm	.30	66.00
10/02/19	JL	Prepare attorney planning meeting reports for Ina Newman and Glenda Johnson cases	.50	75.00
10/03/19	JAB	Conference with Michael Lehr; Review pleadings; Telephone conference with court clerk re scheduling order; Draft initial disclosures template	1.80	522.00
10/03/19	MSL	Revise Diana Shepard/Clover Meadow home turnover motion; Assemble exhibits for Diana Shepard/Clover Meadow home turnover motion including trusts deeds, warranty deeds, declarations, other property records	3.20	704.00
10/03/19	JL	Continue preparation of attorney planning meeting reports for Ina Newman and Glenda Johnson cases; Discussions with Jeffery Balls re same; Online database research relating to judge's scheduling order preferences; Update case management and tracking spreadsheet; Review attorney planning meeting reports and scheduling orders from previously filed cases	4.40	660.00
10/04/19	MSL	Revise Diana Shepard/Clover Meadow property turnover motion; Draft appendix of exhibits for same; Coordinate filing of same	2.80	616.00
10/04/19	JL	Draft scheduling orders for Ina Newman and Glenda Johnson cases	.90	135.00
10/06/19	MSL	Draft reply in support of motion to dismiss counterclaims asserted by Randale Johnson, LaGrand Johnson, and Matthew Shepard; Research re receiver immunity when following court orders for same	4.70	1,034.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 875811  
 RaPower-3 Receivership  
 Litigation

January 15, 2020  
 Client: 176390  
 Matter: 4

Date	Tkpr	Description	Hours	Amount
10/07/19	JAB	Draft and file initial disclosures for Randale Johnson, Matthew Shepard, and Lagrand Johnson; Review documents for same; Email Wayne Klein re initial disclosures; Meet with Wayne Klein and Michael Lehr	4.90	1,421.00
10/07/19	MSL	Conference with Wayne Klein and Jeff Balls re litigation to be filed in Receivership; Draft replies in support of motions to dismiss in Randale Johnson, LaGrand Johnson, and Matthew Shepard cases; Communication with Wayne Klein re same; Coordinate filling of replies in support of motions to dismiss; Draft motion to dismiss Glenda Johnson's counterclaims in Glenda Johnson litigation	6.20	1,364.00
10/08/19	JAB	Review pleadings; Review motion to dismiss Glenda Johnson counterclaims	.40	116.00
10/08/19	MSL	Draft motion to dismiss counterclaims asserted by Glenda Johnson in ancillary litigation; Research re Glenda Johnson standing to bring counterclaims and legal standing requirements; Review deposition transcript of Glenda Johnson re ownership of IAS stock; Communication with Wayne Klein re same; Draft and coordinate filing of requests to submit the Receiver's motions to dismiss in LaGrand Johnson, Randale Johnson, and Matthew Shepard ancillary litigation	5.20	1,144.00
10/08/19	JL	Continue drafting scheduling orders; Update case management tracking spreadsheet; Draft template for attorney planning meeting reports	2.00	300.00
10/09/19	JAB	Conference with Michael Lehr re status	.30	87.00
10/09/19	MSL	Draft declaration of Wayne Klein for motion to dismiss in Glenda Johnson litigation; Communication with Wayne Klein re same; Review and revise motion to dismiss in Glenda Johnson litigation; Coordinate filing of motion to dismiss	2.90	638.00
10/09/19	MSL	Communication with Pat Finlinson re change of address form submitted by Glenda Johnson; Communication with Wayne Klein re same; Research re mailing addresses listed for Utah County properties of Glenda Johnson;	.80	176.00
10/10/19	JAB	Review court order reappointing receiver; Research filing of notices in other districts; Conference with Michael Lehr	1.60	464.00
10/10/19	MSL	Review and respond to email from Wayne Klein re response to settlement discussion with counsel for Nelson Snuffer; Communication with Jeff Balls re meeting with counsel for Robert Johnson	.70	154.00
10/11/19	JAB	Review correspondence re Nelson Snuffer; Review scheduling order; Attend meeting re Robert Johnson; Draft complaints against Kelvin Anderson, Korry Ardell, Jean Armand	2.50	725.00
10/11/19	MSL	Review Glenda Johnson's opposition to summary judgment; Respond to Wayne Klein re conflict of Nelson Snuffer; Review Wayne Klein's communication with counsel for Nelson Snuffer	.60	132.00
10/11/19	JL	Prepare attorney planning meeting report for Frandsen & Hutchings case; Research Judge Furse's rules re scheduling; Check case docket for filings; Update case management spreadsheet with scheduling order due dates	1.10	165.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 875811  
 RaPower-3 Receivership  
 Litigation

January 15, 2020  
 Client: 176390  
 Matter: 4

Date	Tkpr	Description	Hours	Amount
10/13/19	MSL	Review and revise Christopher Taylor complaint; Review and revise Stacey Snow complaint; Review litigation memorandum re Christopher Taylor and Stacey Snow	2.30	506.00
10/14/19	JAB	Draft complaints against James Becker, Bell Energy, Michael Borden, Thomas Coates, Ryan Cook, Robert Delong, Reinhold Finkes	3.40	986.00
10/14/19	MSL	Review and revise Christopher Taylor complaint; Review and revise Curtis Snow complaint; communication with Wayne Klein re same; Review litigation memorandum for Roger Hamblin; Communication with Wayne Klein re Roger Hamblin; Draft complaint against Roger Hamblin; Communication with Sierra Taylor re Rick Jameson complaint; Communication with Wayne Klein re Gary Peterson litigation; Research re non-judicial foreclosure timeline and requirement for Blain and Lisa Phillips trust deed	6.70	1,474.00
10/14/19	SBT	Draft complaint against Richard Jameson and North Star Tax Services	.60	126.00
10/15/19	JAB	Draft attorney planning meeting report of Ina Newman; Email Shane Keppner re same; Draft attorney planning meeting report for Glenda Johnson; Email Steven Paul re same; Coordinate filing notice of receiverships with Natalie McKean; Correspond with Kathleen Thompson at Western District of Oklahoma re notice of receivership	3.20	928.00
10/15/19	MSL	Revise Christopher Taylor and Stacy Snow complaints re fiduciary duty claims; Finalize complaints for filing; Draft civil cover sheets re same; Communication with Jeff Balls re the amounts in the Chris Taylor complaint	3.20	704.00
10/15/19	MSL	Review litigation memorandum and other documents re Roger Hamblin for complaint to be filed against Roger Hamblin; Draft complaint re same	1.00	220.00
10/15/19	SBT	Draft complaint against Richard Jameson	3.80	798.00
10/15/19	JL	Docket research; Create document production log	.20	30.00
10/16/19	JAB	Draft complaints against Andrew Zeigler, Jeffrey Turner, Gracie and Kevin Kerr; Finalize complaints against Robert Delong, Reinhold Finkes, Jeffrey Turner, Gracie and Kevin Kerr, and Anthony Zeigler; Telephone conference with Shane Keppner	5.80	1,682.00
10/16/19	MSL	Review letter from counsel for Nelson Snuffer re settlement; Communication with Wayne Klein re same	.30	66.00
10/16/19	SBT	Draft complaint against Richard Jameson	1.40	294.00
10/17/19	JAB	Draft complaints against The Paynes, Dallas Plater, Richard Searcy, Robert Tilden, Lindy Welborn, James Woodson, Treddis Anderson, Michael Hampton, Rodney Hyatt, Jeron Johnson	3.00	870.00
10/17/19	MSL	Draft Roger Hamblin complaint; Research requirements for piercing corporate veil; Review documents produced in receivership by Roger Hamblin and litigation memorandum	2.40	528.00
10/18/19	JAB	File complaints against Roger Hamblin and Digital Wave Energy; Review pleadings	.30	87.00
10/18/19	MSL	Compile list of cases to be transferred for third motion to transfer related cases	.70	154.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 875811  
 RaPower-3 Receivership  
 Litigation

January 15, 2020  
 Client: 176390  
 Matter: 4

Date	Tkpr	Description	Hours	Amount
10/18/19	MSL	Finalize Roger Hamblin complaint for filing; Draft civil cover sheet re same	.40	88.00
10/18/19	MSL	Review answered filed by various commission recipients; Respond to Wayne Klein re Nelson Snuffer representing commission recipients	.40	88.00
10/18/19	MSL	Respond to counsel for Pamela Orgill re answer and extending time	.20	44.00
10/18/19	JL	Prepare attorney planning meeting reports for Kulacz, Smith, Orgill, Brennan and Jones	2.90	435.00
10/20/19	MSL	Review and revise letter to counsel for Nelson Snuffer re claims against Nelson Snuffer; Review corrected receivership order re same; Review filings by Nelson Snuffer re funds in trust account for same; Draft motion for extension of time to respond to Glenda Johnson's opposition to turnover motion; Email communication with DOJ re same	2.90	638.00
10/21/19	JAB	Finalize and file complaints against Kory Ardell, James Becker, Michael Borden, Thomas Coates, Ryan Cook, Linda and Steven Payne, Dallas Plater, Robert Tilden, James Woodson, Treddis Anderson; Review pleadings; Draft initial disclosures for Steven Bowers; Draft complaints against Jacqueline Freeborn, Bill Pack, and Mark Shepard; Review motion for extension to file appeal; Finalize complaints against Kelvin Anderson, Bell Energy Holdings, LLC, and Jeron Johnson	7.60	2,204.00
10/21/19	MSL	Review and revise letter to counsel for Nelson Snuffer re claims against Nelson Snuffer; Review corrected receivership order re same; Review filings by Nelson Snuffer re funds in trust account for same; Communication with Wayne Klein re same; Draft proposed order for motion for extension of time to file response to Glenda Johnson's opposition to turnover motion; Revise motion for extension; Coordinate filing of motion for extension	3.00	660.00
10/21/19	MSL	Draft third motion to transfer related cases to Judge Nuffer; Draft proposed order re same; Review complaint filed by the receiver for transfer motion; Coordinate filing third transfer motion	3.60	792.00
10/21/19	MSL	Draft and revise Richard Jameson complaint; Communication with Jeff Balls re Bill Pack and Mark Shepard complaints	1.50	330.00
10/21/19	JL	Prepare attorney planning meeting reports for Frandsen & Hutchings and Scott & Shauna Black; Update tracking spreadsheet; Docket research re recent filings by defendants	1.40	210.00
10/22/19	JAB	Finalize complaints against Kelvin Anderson, Jeron Johnson, Natalyn Lewis, Jimmy Couch, Mark Shepard, and Bell Energy; Draft complaints against Citibank, Chase, Discover	3.10	899.00
10/22/19	MSL	Communication with counsel for law firm re funds in trust account and settlement; Communication with Wayne Klein re same; Draft notices of transfer motion to be filed in each case filed by the receiver; Coordinate filing of transfer notices of transfer motions; Draft and revise Richard Jameson complaint	3.90	858.00
10/23/19	JAB	Review general order re judge Nuffer; Review motions to stay; Coordinate filing notice of motion to transfer with Natalie McKean	3.20	928.00

## PARR BROWN GEE &amp; LOVELESS

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 RaPower-3 Receivership  
 Litigation

January 15, 2020  
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 Matter: 4

Date	Tkpr	Description	Hours	Amount
10/23/19	MSL	Review litigation memorandum re Monty Hamblin complaint; Review documents produced in Receivership re the nature of Monty Hamilton's relationship re receivership defendants; Research re whether funds paid to an excluded expert witness are avoidable under fraudulent transfer statute; Communication with Sierra Taylor re Richard Jameson complaint	5.20	1,144.00
10/24/19	JAB	Finalize complaints against Bill Pack and Christopher Taylor; Draft complaints against Plaskolite and Leo Brittain; various parties; Review answer from Lyle Swenson	3.20	928.00
10/24/19	MSL	Research re aiding and abetting fraud and aiding and abetting breach of fiduciary duty in Utah; Draft complaint to be filed against Gary Peterson	1.60	352.00
10/24/19	MSL	Revise notice of transfer motion; Communication with Jeff Balls re Christopher Taylor complaint; Draft Monty Hamilton and W.E. Hamilton Associates complaint; Communication with Wayne Klein re Hamilton and Richard Jameson complaints; Draft civil cover sheet for Hamilton and Jameson complaints; Review documents from Wayne Klein re Monty Hamilton stock transfers and involvement with IAS	6.20	1,364.00
10/25/19	JAB	Draft complaints against Citibank, Chase, Discover	1.20	348.00
10/25/19	MSL	Finalize Monty Hamilton and Richard Jameson insider complaints; Coordinate filing re same	1.30	286.00
10/25/19	MSL	Draft Gary Peterson complaint; Research re aiding and abetting breach of fiduciary duty claims in Utah; Review correspondence with counsel for Robert Johnson re meeting for turnover of funds; Coordinate notices of transfer to be filed in cases that have not been transferred	4.90	1,078.00
10/28/19	JAB	Draft complaints against Citibank, Chase, Discover, Plaskolite, Frank Lunn; Research case law re banks; Review answer from Kirk Newman, Steven Chaston; Review motions to stay filed by Newman and Chaston; Review orders reassigning cases to Nuffer	7.10	2,059.00
10/28/19	MSL	Draft Gary Peterson and Peregrine Consulting complaint; Communication with Wayne Klein re same; Email communication with counsel for Nelson Snuffer re tolling agreement and turnover of funds in trust account	2.90	638.00
10/29/19	JAB	Finalize complaints against Citibank, Chase, Discover, Plaskolite, Frank Lunn; Draft complaints against Jacqueline Freeborn and Roger Freeborn estate, Leo Brittain estate and children, Spencer Griffin III, Painting, LLC; Research case law re naming estates; Review pleadings	5.80	1,682.00
10/29/19	MSL	Finalize Gary Peterson complaint for filing	.40	88.00
10/29/19	MSL	Communication with Jon Hafen re complaint to be filed against Don Reay; Review litigation memorandum sent by Wayne Klein re Don Reay; Review previous complaints filed against attorneys; Draft Don Reay complaint	2.70	594.00
10/29/19	MSL	Review litigation memorandum sent by Wayne Klein re K. Hawes Associates including court's findings disqualifying Kurt Hawes; Review previous complaints filed against attorneys and experts; Draft K. Hawes Associates complaint; Communication with Wayne Klein re same	3.90	858.00



## PARR BROWN GEE &amp; LOVELESS

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January 15, 2020  
 Client: 176390  
 Matter: 4

Date	Tkpr	Description	Hours	Amount
10/29/19	MSL	Review litigation memorandum sent by Wayne Klein re Gleaves Swearingen; Review previous complaints filed against attorneys; Draft Gleaves Swearingen complaint; Communication with Wayne Klein re same; Research re fraudulent transfer claims against attorneys	3.60	792.00
10/29/19	JL	Edit attorney planning meeting reports; Draft scheduling orders	1.80	270.00
10/30/19	JAB	Finalize complaints against Jacqueline Freeborn and Roger Freeborn estate, Leo Brittain estate and children, Spencer Griffin III, Painting, LLC for filing; Review reassignments and other pleadings	1.10	319.00
10/30/19	MSL	Draft Don Reay complaint; Draft and revise Gleaves Swearingen complaint; Revise K. Hawes Associates complaint; Finalize complaints for filing; Draft civil cover sheets; Communication with Wayne Klein re complaints of Reay and Swearingen	2.60	572.00
10/30/19	MSL	Draft complaint to be filed against Nelson Snuffer; Review litigation memorandum and exhibits from Wayne Klein re litigation against Nelson Snuffer; Review court orders and filings in the underlying case for complaint against Nelson Snuffer; Communication with counsel for Nelson Snuffer re same; Communication with Wayne Klein re same	8.10	1,782.00
10/31/19	JAB	Review complaints against Nelson Snuffer; Conference with Michael Lehr; Review attorney planning meeting reports; Email Steven Paul; Telephone conference with Larry Hutchins	2.30	667.00
10/31/19	MSL	Draft and revise Nelson Snuffer complaint; Communication with Wayne Klein re Nelson Snuffer complaint and affidavit of non-compliance; Compile exhibit for same; Review redline of Wayne Klein; finalize complaint for filing; Draft civil cover sheet; Communication with counsel for Nelson Snuffer; Communication with Dave Castleberry re civil cover sheets	4.80	1,056.00
11/01/19	MSL	Communication with counsel for Nelson Snuffer re acceptance of service; Draft acceptance of service form; Communication with Wayne Klein re conduct by law firms in receivership; Email communication with counsel for Diana Shepard re extension of time to reply to summary judgment motion	.90	198.00
11/01/19	JL	Prepare scheduling orders for Scott and Shauna Black, Connie Kulacz, Kelvin Smith, Pamela Orgill, Paul Brennan, Shane Luke and Trudy Shepard	3.50	525.00
11/03/19	MSL	Research re business records declarations from Wells Fargo and Millard County Credit Union	.60	132.00
11/04/19	JAB	Draft opposition to motion to stay; Correspond with Wayne Klein re settlements; Email Steven Bowers re settlement; Review correspondence re settlement; Telephone conference with Steven Paul for attorney planning meeting; Email the Blacks re discovery; Email Shane Luke re discovery; Email Melvin Day re discovery; Email Lynette Williams re discovery; Finalize attorney planning meeting reports and proposed scheduling order	5.10	1,479.00
11/04/19	MSL	Communication with counsel for Nelson Snuffer re fiduciary duty claims	.30	66.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 875811  
 RaPower-3 Receivership  
 Litigation

January 15, 2020  
 Client: 176390  
 Matter: 4

Date	Tkpr	Description	Hours	Amount
11/04/19	JL	Prepare attorney planning meeting report for Lynette Williams; Docket research; Update tracking spreadsheet	.40	60.00
11/05/19	JAB	Draft opposition to motion for stay; Correspond with the Blacks; Correspond with Tom Day	3.70	1,073.00
11/06/19	JAB	Telephone conference with Debbie Smith; Draft opposition to motion to stay of Paul Brennan, Lagrand Johnson, Gelnda Johnson, Kelvin Smith, Paul Jones, Turdy Shepard, Randale Johnson, Pamela Orgill, Connie Kulacz, and Matthew Shepard; Email Wayne Klein re same	3.30	957.00
11/06/19	MSL	Review and revise oppositions to motions to stay proceeding including reviewing and linking citations in opposition	1.00	220.00
11/06/19	MSL	Communication with Wayne Klein re Phillips foreclosure; Review Utah's foreclosure statute; Draft notice of sale	.90	198.00
11/07/19	JAB	Telephone conference with Michael Stanger; Review pleadings; Draft initial disclosures	.70	203.00
11/07/19	MSL	Research re credit bidding under Utah's foreclosure statute; Draft notice of trustee's sale; Communication with Wayne Klein re same	.60	132.00
11/08/19	JAB	Review answer of Janet Roe and Carey Hadderton; Draft initial disclosures for Ina Newman and Glenda Johnson; Review documents for initial disclosures	2.80	812.00
11/08/19	MSL	Conference with counsel for Robert Johnson re amounts settlement; Review emails and other documents exchanged with Robert Johnson's counsel in preparation for conference	1.50	330.00
11/11/19	JAB	Draft initial disclosures for Ina Newman and Glenda Johnson; Email Steven Paul re initial disclosures for Glenda Johnson; Telephone conference with Wayne Klein; Review initial disclosures of Glenda Johnson	2.50	725.00
11/12/19	JAB	Draft opposition to motion to stay; Review appellate brief; Draft initial disclosures for Ina Newman; Email Shane Keppler re Ina Newman initial disclosures; Review initial disclosures of Ina Newman; Telephone conference with Tom Day	4.80	1,392.00
11/12/19	MSL	Finalize notice of trustee's sale; Coordinate filing and publishing notice; Communication with Wayne Klein and Erin Healy-Gallagher re hearing status for motion for additional contempt sanctions	.60	132.00
11/12/19	JL	Prepare attorney planning meeting reports and scheduling orders for Chaston, Swenson, Newman, Hadderton, Roe, Clement, Kinsey and Suncore	3.50	525.00
11/13/19	JAB	Review and revise attorney planning meeting reports for Steven Chaston, Kirk Newman, Carey Hadderton, and Janet Roe; Email Steven Paul re same; Finalize attorney planning meeting reports for Melvin Day and Shane Luke	2.80	812.00
11/13/19	JL	Draft scheduling orders for Clement, Kinsey and Suncore	1.20	180.00
11/14/19	JAB	Review correspondence and pleadings	.70	203.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 875811  
 RaPower-3 Receivership  
 Litigation

January 15, 2020  
 Client: 176390  
 Matter: 4

Date	Tkpr	Description	Hours	Amount
11/14/19	MSL	Communication with Wayne Klein re extension for time to file reply to Glenda Johnson turnover motion; Draft stipulation re extension; Coordinate filing of stipulation; Coordinate publication of Phillip's notice of trustee's sale	1.10	242.00
11/15/19	JAB	Telephone conference with Lynette Williams	.30	87.00
11/18/19	JAB	Complete consent to proceed form; Correspond with counsel re attorney planning meeting reports; Review initial disclosures of Ina Newman; Prepare information for summons; Review reply memoranda in support of motion to stay	2.00	580.00
11/18/19	JL	Docket research relating to pending answers	.10	15.00
11/19/19	JAB	Conference with Wayne Klein and Michael Lehr; Telephone conference with Morgan Fife; Correspond with counsel re attorney planning meeting report; Draft motion for entry of default judgment; Telephone conference with Lynette Williams	4.70	1,363.00
11/19/19	MSL	Conference with Wayne Klein and Jeff Balls re litigation strategy and next steps	1.20	264.00
11/19/19	MSL	Review opposition to Glenda Johnson turnover motion; Review evidentiary objections made to exhibits in Glenda Johnson turnover motion; Research hearsay and exceptions; Draft table re evidence for reply in support of turnover motion	3.80	836.00
11/20/19	JAB	Review discovery requests; Telephone conference with Steven Paul re attorney planning meeting reports	4.40	1,276.00
11/20/19	MSL	Research re claim splitting in federal court; Research re hearsay and exceptions; Research re objections to evidence under Rule 56 of the Federal Rules of Civil Procedure; Research re submitting evidence on reply; Draft section re claim splitting in reply; Draft table refuting hearsay objections made by Glenda Johnson	13.20	2,904.00
11/21/19	JAB	Correspond with Lynette Williams; Review answers to complaints; Review motion for approval of settlement agreements	1.90	551.00
11/21/19	MSL	Draft and revise section re claim splitting; Draft and revise section re hearsay and exceptions including table; Draft response additional statement of material facts; Draft introduction section; Draft response to contract attached to Glenda Johnson declaration; Review previous statements made by Glenda Johnson in depositions and declarations	13.40	2,948.00
11/22/19	JAB	Review correspondence from Ryan Davies; Review reply memorandum in support of Glenda Johnson turnover motion; Conference with Michael Lehr; Draft initial disclosures	3.50	1,015.00
11/22/19	MSL	Draft and revise reply in support of Glenda Johnson turnover motion; Communication with Wayne Klein re same; Finalize reply for filing; Coordinate filing of reply	9.30	2,046.00
11/22/19	JL	Draft attorney planning meeting reports for Bennett, Jordan, Manley, and Scraggs	1.60	240.00
11/24/19	MSL	Review filings for affidavit of non-compliance against Nelson Snuffer; Review previous communications with counsel for Nelson Snuffer re same; Draft affidavit of non-compliance	1.70	374.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 875811  
 RaPower-3 Receivership  
 Litigation

January 15, 2020  
 Client: 176390  
 Matter: 4

Date	Tkpr	Description	Hours	Amount
11/25/19	JAB	Draft oppositions to motion to stay	3.30	957.00
11/25/19	MSL	Draft affidavit of non-compliance against Nelson Snuffer; Communication with Wayne Klein re same; Review revised affidavit	3.60	792.00
11/26/19	JAB	Telephone conference with Steven Bowers; Email Michael Stanger	2.40	696.00
11/26/19	MSL	Draft reply in support of motion to dismiss re counterclaims asserted by Glenda Johnson; Communication with Wayne Klein re same	1.40	308.00
11/26/19	MSL	Communication with Wayne Klein re affidavit of non-compliance re Nelson Snuffer; Revise affidavit; Communication with Counsel for Nelson Snuffer re affidavit	1.80	396.00
11/26/19	JL	Docket research; Update tracking spreadsheet	.10	15.00
11/27/19	JAB	Draft initial disclosures for Connie Kulacz, Kelvin Smith, Paul Brennan, Melvin Day, Paul Jones, and Trudy Shepard; Conference with Michael Lehr re matters	4.50	1,305.00
11/27/19	MSL	Finalize reply in support of motion to dismiss counterclaims asserted by Glenda Johnson; Coordinate filing of same; Communication with Wayne Klein re motion to strike filed by Glenda Johnson	1.20	264.00
11/27/19	MSL	Review opposition to motion for finding that Greg Shepard had 1/2 interest in Clover Meadow property; Communication with counsel for Greg Shepard and Wayne Klein re extension for reply; Draft stipulation re extension; Coordinate filing stipulation	.80	176.00
11/28/19	MSL	Communication with Wayne Klein re commission recipient payments made in furtherance of fraud	.30	66.00
12/02/19	JAB	Review initial disclosures of Kelvin Smith, Trudy Shepherd, Paul Jones, Paul Brennan, and Connie Kulacz; Draft opposition to motion to stay; Review correspondence between Wayne Klein and Earnest Badway	2.20	638.00
12/02/19	JL	Docket research re filing of answers; Draft attorney planning meeting report and scheduling order for Nelson Snuffer Dahle & Poulsen; Update tracking spreadsheet	1.00	150.00
12/03/19	JAB	Review correspondence between Wayne Klein and Ernest Badway; Review motion to retain records; Research case law re retention of records; Review correspondence from Morgan Fife; Review declaration of Neldon Johnson re source of funds for filings	3.70	1,073.00
12/03/19	MSL	Review and respond to email communication with counsel for Nelson Snuffer re funds in trust account; Communication with Wayne Klein re same; Review Neldon Johnson declaration re funds	.80	176.00
12/04/19	JAB	Review correspondence from Morgan Fife; Email Wayne Klein re settlement offer from Morgan Fife; Review answer from Dennis Stilson; Email Wayne Klein re same	1.40	406.00
12/04/19	MSL	Revise declaration of non-compliance against Nelson Snuffer; Communication with Wayne Klein re same; Finalize and coordinate filing of declaration	.90	198.00

## PARR BROWN GEE &amp; LOVELESS

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 RaPower-3 Receivership  
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January 15, 2020  
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 Matter: 4

Date	Tkpr	Description	Hours	Amount
12/05/19	JAB	Draft opposition to motion to stay for Carey Hadderton, Janet Roe, Joseph Scraggs, and Amber Bennett; Conference with Mike Lehr re commission recipient case law; Research case law re commission recipients	4.00	1,160.00
12/05/19	JL	Docket research re filing of answers	.10	15.00
12/06/19	JAB	Email Morgan Fife; Draft opposition memorandum to motion to retain records; Conference with Mike Lehr re acceptance of service from John Teakell	2.10	609.00
12/09/19	JAB	Review orders on motion to dismiss; Draft acceptance of service for Frank Lunn; Review correspondence re Robert Johnson settlement	2.00	580.00
12/09/19	MSL	Multiple communications with counsel for Nelson Snuffer re declaration of non-compliance	.40	88.00
12/09/19	MSL	Review motion to strike evidence submitted by Receiver in reply in support of Glenda Johnson turnover motion; Review local rules re submission of evidence on reply; Research re same; Draft opposition to motion to strike	4.90	1,078.00
12/09/19	JL	Docket research re filing of answers	.10	15.00
12/10/19	JAB	Review proofs of service for Michael Borden, Jacqueline Freeborn, the estate of Roger Freeborn, Reinhold Finkes, Robert Delong, Jeron Johnson, Spencer Griffin, Amber Benett, Steven King, Joseph Scraggs, Debbie Smith, Raleigh Stewart, ; Review reply memorandums in support of motion to stay, Review opposition to motion to strike; Conference with Mike Lehr re same; Draft opposition to motion to retain records	2.70	783.00
12/10/19	MSL	Draft opposition to motion to strike re materials submitted with reply in support of Glenda Johnson turnover motion; Communication with Wayne Klein re same; Finalize opposition to motion to strike; Coordinate filing re same	5.40	1,188.00
12/10/19	MSL	Review and revise second motion to approve settlements; Communication with Wayne Klein re same; Coordinate filing re same	1.10	242.00
12/11/19	JAB	Draft memorandum in opposition to motion to retain records; Email Wayne Klein re same	5.30	1,537.00
12/11/19	JL	Docket research re filing of answers	.10	15.00
12/12/19	JAB	Revise memorandum in opposition to motion to retain records; Review initial disclosures of Shane Luke and the Blacks; Draft initial disclosures	4.10	1,189.00
12/12/19	MSL	Communication with Wayne Klein re ICSID payment by Robert Johnson	.20	44.00
12/13/19	JAB	Correspond with Michael Lehr; Review answer from Jacqueline Freeborn; Review summons for Texas defendants; Research case re commission recipients; Correspond with Morgan Fife re settlement; Review motion to intervene filed by Nelson Snuffer; Email Wayne Klein re same; Review pro se answers for entities; Call Steve Bowers re settlement	3.80	1,102.00

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 Litigation

January 15, 2020  
 Client: 176390  
 Matter: 4

Date	Tkpr	Description	Hours	Amount
12/13/19	MSL	Research re waiver of service and acceptance of service for service of summons and complaint to Mahler, Howell, Palmore, and Couch; Draft acceptance of service form re same; Communication with Wayne Klein and John Teakell re acceptance of service	1.90	418.00
12/13/19	MSL	Research re pro se litigants representing an estate; Communication with Wayne Klein re same	.40	88.00
12/13/19	JL	Docket research re filing of answers	.10	15.00
12/15/19	MSL	Review motion to intervene filed by counsel for Nelson Snuffer; Draft communication with Wayne Klein re response to motion to intervene	1.10	242.00
12/16/19	JAB	Review correspondence re motion to intervene; Conference with Michael Lehr re motion to intervene; Call Steven Bowers re settlement; Review status of service of process on defendants; Draft initial disclosures for Clement-Kinsey matter; Review initial disclosures of Lynette Williams; Draft motion for default against Jason Clement	2.40	696.00
12/16/19	MSL	Communication with counsel for Nelson Snuffer re attorney planning meeting draft document	.30	66.00
12/16/19	MSL	Communication with Wayne Klein opposition to motion to intervene filed by counsel for Nelson Snuffer	.30	66.00
12/16/19	MSL	Review Greg Shepard's opposition and exhibits to motion for turnover of clover meadow property; Draft responses to Greg Shepard's additional statement of material facts in reply in support of motion for turnover; Research re legal standard for material factual allegation under Rule 56	4.70	1,034.00
12/16/19	JL	Docket research re filing of answers	.10	15.00
12/17/19	JAB	Review subpoenas; Draft initial disclosures to Lynette Williams; Finalize motion for default for Jason Clement; Review communication from Wayne Klein re tolling agreements; Conference with Michael Lehr re attorney fees motion; Draft application for default against Raleigh Stewart; Review initial disclosures of Thomas Day	3.20	928.00
12/17/19	MSL	Draft reply in support of Clover meadow turnover motion; Research re a district court's jurisdiction over summary proceedings and property in a receivership; Review turnover motion and opposition	4.30	946.00
12/17/19	JL	Review initial disclosures and update document production log	.20	30.00
12/18/19	JAB	Review order on entry of default certificate against Jason Clement; Call Steven Bowers re settlement; Review correspondence from Mike Skolnick re attorney planning meeting report; Correspond with Morgan Fife	1.10	319.00
12/18/19	MSL	Draft reply in support of motion for turnover of Shepard Clover Meadow home	.80	176.00
12/19/19	JAB	Draft correspondence to Morgan Fife; Research case law re commission recipients; Review deadlines for Connie Kulacz and Ina Newman cases; Review status of service of process on defendants; Research case law re extension of time to serve defendants under Rule 4(m); Draft motion for extension of time to complete service on Joel Bean, Thomas Mooney, and Edward Jordan; Review initial disclosures of Ed Kinsey, Suncore Energy, and Edde Enterprises	4.90	1,421.00

## PARR BROWN GEE &amp; LOVELESS

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 Litigation

January 15, 2020  
 Client: 176390  
 Matter: 4

Date	Tkpr	Description	Hours	Amount
12/19/19	MSL	Draft argument section in reply in support of Clover Meadow turnover motion including subsection re the use of summary proceeding, section re declarations submitted with the opposition, and section re hearsay objections; Research re self-serving declarations and summary judgment standards; Revise responses to additional facts section in reply	7.90	1,738.00
12/20/19	JAB	Draft motion for extension of time to complete service on Joel Bean, Thomas Mooney, and Edward Jordan; Telephone conference with Marcia McBride re proofs of service; Correspond with Marcia McBride re proofs of service	1.30	377.00
12/20/19	MSL	Draft introduction section of reply in support of Clover Meadow property turnover motion; Review and revise reply including section re Diana Shepard Declaration submitted with Greg Shepard's opposition; Communication with Wayne Klein re same; Coordinate filing of reply	6.30	1,386.00
12/23/19	JAB	Email Marcia McBride re proofs of service and non-service; Review reply memorandum in support of motion to retain records; Telephone conference with Marcia McBride	.90	261.00
12/23/19	MSL	Telephone and email communication with counsel for Rodney Hyatt re settlement and answer to complaint	.40	88.00
12/23/19	MSL	Communication with John Teakell counsel for Howell, Palmore, Couch, and DeLong re service	.20	44.00
12/24/19	MSL	Draft opposition to Nelson Snuffer's motion to intervene; Research re Utah Rules of Professional Conduct and trust accounts and client funds; Research re Federal Rule of Civil Procedure 24; Review motion to intervene and orders entered in the Receivership	6.50	1,430.00
12/25/19	MSL	Draft opposition to Nelson Snuffer's motion to intervene	.90	198.00
12/26/19	MSL	Draft opposition to motion to intervene; Communication with Erin Healy Gallagher; Erin Hines, and Wayne Klein re opposition; Telephone Communication with Erin Healy Gallagher; Revise motion to intervene based on comments from DOJ and Wayne Klein	7.70	1,694.00
12/26/19	MSL	Email communication with John Teakell re acceptance of service	.20	44.00
12/26/19	JL	Docket research re filing of answers	.10	15.00
12/27/19	JOH	Correspond by email with clawback defendant; Follow up re same	.10	37.00
12/27/19	MSL	Communication with Wayne Klein and Erin Healy Gallagher re opposition to motion to intervene; Coordinate filing of motion	.40	88.00
12/30/19	JAB	Email Michael Borden; Telephone conference with Steven Bowers re settlement; Review answer from Raleigh Stewart and motion for email filing and notification; Review order denying Nelson Snuffer's motion to retain records; Review answer of Richard Neil Searcy; Review order granting motion for extension of time to serve Edward Jordan; Telephone conference with Kristi Turner; Research address for Joel Bean; Email Wayne Klein re Turner/Brittain settlement; Email Kristi Turner re settlement	2.30	667.00
12/30/19	MSL	Communication with Wayne Klein re requests to submit	.30	66.00

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January 15, 2020  
 Client: 176390  
 Matter: 4

Date	Tkpr	Description	Hours	Amount
12/31/19	JAB	Review correspondence from Kristi Turner; Review letters from attorneys for Nick Kontos, Mark Sikich, Thad Brumfield, and Robert and Patricia Aulds;	2.20	638.00
12/31/19	MSL	Draft request to submit re Glenda Johnson turnover motion, Clover Meadow motion, and second settlement motion; Review docket and local rules re request to submit; Review order denying Nelson Snuffer's motion to retain documents	1.70	374.00
12/31/19	JL	Docket research re filing of answers	.10	15.00

**TOTAL PROFESSIONAL SERVICES****\$ 107,035.00**

Less Courtesy Discount

**\$ -10,703.50****NET PROFESSIONAL SERVICES****\$ 96,331.50****SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Jonathan O Hafen	370.00	.10	37.00
Jeffery A Balls	290.00	172.70	50,083.00
Michael S. Lehr	220.00	233.60	51,392.00
Sierra B Taylor	210.00	6.30	1,323.00
Jasmine Leonardi - Paralegal	150.00	28.00	4,200.00
<b>TOTALS</b>		<b>440.70</b>	<b>\$ 107,035.00</b>

**COSTS ADVANCED**

Date	Description	Amount
10/01/19	Filing Fees, Complaint, Pay.gov	400.00
10/01/19	Filing Fees, Complaint, Pay.gov	400.00
10/01/19	Office of the Utah County Constable LLC -- Service of summons and complaint: Pamela Orgill	39.00
10/01/19	Office of the Utah County Constable LLC -- Service of summons and complaint: Paul Jones	79.00
10/02/19	Filing Fees, Complaint, Pay.gov	400.00
10/02/19	Filing Fees, Complaint, Pay.gov	400.00
10/07/19	Office of the Utah County Constable LLC -- Service of summons and complaint: Lyle Swenson	39.00
10/08/19	Office of the Utah County Constable LLC -- Service of summons and complaint: Kirk B Newman	39.00
10/08/19	Office of the Utah County Constable LLC -- Service of summons and complaint: Edde Enterprises, LLC	69.00
10/10/19	Office of the Utah County Constable LLC -- Service of summons and complaint: Jay D. Frandsen	39.00
10/13/19	Utah Interactive - Business entity search	1.00
10/13/19	Utah Interactive - images	2.00
10/15/19	Filing Fees, Utah Courts, complaint (Stacy Snow)	400.00



## PARR BROWN GEE &amp; LOVELESS

Invoice: 875811  
 RaPower-3 Receivership  
 Litigation

January 15, 2020  
 Client: 176390  
 Matter: 4

<b>Date</b>	<b>Description</b>	<b>Amount</b>
10/16/19	Filing Fees, Utah Courts, complaint	400.00
10/16/19	Filing Fees, Utah Courts, complaint (Turner)	400.00
10/16/19	Filing Fees, Utah Courts, complaint (Kerr)	400.00
10/16/19	Filing Fees, Utah Courts, complaint (DeLong)	400.00
10/16/19	Filing Fees, Utah Courts, complaint (Zeigler)	400.00
10/16/19	Office of the Utah County Constable LLC -- Service of summons and complaint: Dennis Stilson	39.00
10/17/19	Filing Fees, Utah Court, complaint (Klein v. Welborn)	400.00
10/17/19	Filing Fees, Utah Courts, complaint (Searcy)	400.00
10/17/19	Filing Fees, Utah Courts, complaint (Hyatt)	400.00
10/17/19	Filing Fees, Utah Courts, complaint (Klein v. Hampton)	400.00
10/17/19	Filing Fees, Utah Court, complaint (Klein v. Armand)	400.00
10/18/19	Filing Fees, complaint (Klein v. Hamblin)	400.00
10/21/19	Filing Fees, complaint (Klein v. T Anderson)	400.00
10/21/19	Filing Fees, complaint (Klein v. Tilden)	400.00
10/21/19	Filing Fees, complaint, (Klein v. Woodson)	400.00
10/21/19	Filing Fees, complaint, (Klein v. Ardell)	400.00
10/21/19	Filing Fees, complaint, (Klein v. Becker)	400.00
10/21/19	Filing Fees, complaint, (Klein v. Borden)	400.00
10/21/19	Filing Fees, complaint, (Klein v. Coates)	400.00
10/21/19	Filing Fees, complaint, (Klein v. Cook)	400.00
10/21/19	Filing Fees, complaint, (Klein v. Payne)	400.00
10/21/19	Filing Fees, complaint, (Klein v. Plater)	400.00
10/22/19	Filing Fees, complaint, (Klein v. K Anderson)	400.00
10/22/19	Filing Fees, complaint, (Klein v. J. Johnson)	400.00
10/22/19	Filing Fees, complaint, (Klein v. N. Lewis)	400.00
10/22/19	Filing Fees, complaint, (Klein v. Couch)	400.00
10/22/19	Filing Fees, complaint, (Klein v. M. Shephard)	400.00
10/22/19	Filing Fees, complaint, (Klein v. Bell Energy Holdings)	400.00
10/24/19	Complaint filing fee	400.00
10/24/19	Complaint filing fee	400.00
10/25/19	Complaint filing fee	400.00
10/25/19	Complaint, filing fees	400.00
10/28/19	Office of the Utah County Constable LLC -- Service of summons and complaint: Jason Clement	119.00
10/28/19	Office of the Utah County Constable LLC -- Service of summons and complaint: SunCore Energy Inc.	129.00
10/29/19	Filing Fees, complaint, (Klein v. Peterson, etal)	400.00
10/29/19	Filing Fees, complaint, (Klein v. Kahuna Builders)	400.00
10/29/19	Filing Fees, complaint, (Klein v. JP Morgan Chase)	400.00
10/29/19	Filing Fees, complaint, (Klein v. Discover)	400.00
10/29/19	Filing Fees, complaint, (Klein v. Plaskolite)	400.00
10/29/19	Filing Fees, complaint, (Klein v. Citibank)	400.00
10/30/19	Complaint filing fee	400.00
10/30/19	Complaint filing fees	400.00
10/30/19	Complaint filing fee	400.00
10/30/19	Complaint filing fees	400.00
10/31/19	Filing Fees, complaint, (Klein v. Nelson Snuffer)	400.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 875811  
 RaPower-3 Receivership  
 Litigation

January 15, 2020  
 Client: 176390  
 Matter: 4

Date	Description	Amount
11/04/19	Service of summons and complaint on Janet L. Roe	85.00
11/04/19	Service of summons and complaint on Carey Hadderton	85.00
11/06/19	ABC Legal Services, Process service on Jean R. Armand	65.00
11/20/19	ABC Legal - process service for Jean R Armand	65.00
11/20/19	ABC Legal - process service for Michael Borden, Michael J. Borden Sr.	85.00
11/20/19	ABC Legal - process service for Thomas Coates, Thomas J. Coates Jr.	95.00
11/20/19	ABC Legal - process service for Jacqueline S. Freeborn, The Estate of Roger Allen Freeborn	85.00
11/20/19	ABC Legal - process service for Ryan D. Cook	125.00
11/20/19	ABC Legal - process service for James Becker	125.00
11/20/19	ABC Legal - process service for Richard Neil Searcy	85.00
11/20/19	ABC Legal - process service for Rodney Glenn Hyatt	85.00
11/20/19	ABC Legal - process service for Michael Hampton	85.00
11/20/19	ABC Legal - process service for Jeffrey Turner	95.00
11/20/19	ABC Legal - process service for Kerrs, Gracie Kerr, Kevin Anderson Kerr	190.00
11/20/19	ABC Legal - process service for Reinhold J. Finkes	95.00
11/20/19	ABC Legal - process service for Robert Lee Delong	95.00
11/20/19	ABC Legal - process service for Jeron Johnson	65.00
11/20/19	ABC Legal - process service for Bell Energy	65.00
11/20/19	ABC Legal - process service for Spencer Griffin, Spencer Griffin III, Spencer Griffin, III, Painting, LLC	130.00
11/20/19	ABC Legal - process service for Kelvin E. Anderson	65.00
12/02/19	Service of summons and complaint on Joseph E. Scraggs	115.00
12/02/19	Service of summons and complaint on Steven Lynn King	95.00
12/02/19	Service of summons and complaint on Amber L. Bennett	95.00
12/06/19	Service of summons and complaint on Raleigh Dean Stewart	115.00
12/06/19	Service of summons and complaint on Mark Manley	85.00
12/06/19	Service of summons and complaint on Debbie Smith	115.00
12/06/19	Service of summons and complaint on Raleigh Dean Stewart	115.00
12/11/19	Service of Summons and Complaint on The Estate of Leo and Karin Brittain	190.00
12/11/19	Service of Summons and Complaint on Kristin Brittain Turner	270.00
12/11/19	Service of Summons and Complaint on Brent Brittain	135.00
12/16/19	ABC Legal Services -- Service Process on Jeffrey Turner	125.00
12/16/19	ABC Legal Services -- Service Process on Thomas J Coates Jr.	95.00
12/16/19	ABC Legal Services -- Service Process on Bell Energy Holdings, LLC	65.00
12/19/19	Service of Summons and Complaint on James Woodson	135.00
12/19/19	Service of Summons and Complaint on Lindy Welborn	135.00
12/19/19	Service of Summons and Complaint on Dallas Plater	145.00
12/19/19	Service of Summons and Complaint on Linda & Steven Payne	180.00
12/19/19	Service of Summons and Complaint on Gleaves Swearingen	135.00
12/19/19	Service of Summons and Complaint on Robert H. Tilden Jr.	135.00

**TOTAL COSTS ADVANCED**

**\$ 23,744.00**

**TOTAL THIS INVOICE**

**\$ 120,075.50**

## **EXHIBIT B-3**



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Page No: 1  
Statement Date: 09/30/2019  
Account No: 21868-00010  
Statement No: 57135

Snell & Wilmer

Fees

		Hours	
09/30/2019	DCC		
	Read and analyze documents from receiver re new case; read e-mail from receiver re same.	0.50	175.00
	For Current Services Rendered	0.50	175.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	0.50	\$350.00	\$175.00
Total Current Work			175.00
Balance Due			<u>\$175.00</u>

Taxpayer ID # 84-1395129



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Page No: 1  
Statement Date: 10/31/2019  
Account No: 21868-00010  
Statement No: 57329

Snell & Wilmer

Fees

		Hours	
10/01/2019	DCC Review file and draft e-mail to receiver; analyze available procedures re possible claims in matter.	0.50	175.00
10/07/2019	DCC Read and analyze documents received from receiver; analyze issues in case; draft e-mail re schedule for completing assignments in preparation for filings in case; telephone conference with receiver re timing of work flow in case; analyze legal issues in case and legal research re same; provide instruction to MMLongson re case analysis memo.	3.80	1,330.00
	MML Analyze issues raised in client's litigation memorandum.	0.50	110.00
10/08/2019	NLR Receive instruction from MMLongson; add and organize documents received from client into iPro database, index of file, and Worldox; provide summary of tasks completed to MMLongson.	1.30	195.00
	DCC Read emails and documents from receiver re claims to pursue; read e-mail and documents re findings in case and orders related to claims and defenses at issue in matter.	1.00	350.00

RaPower-3, LLC Receivership

Page No: 2  
Statement Date: 10/31/2019  
Account No: 21868-00010  
Statement No: 57329

		Hours	
10/09/2019	MML	Review litigation memo and materials provided by client; research re turnover motion procedure.	2.30 506.00
10/10/2019	MML	Review documents and pleadings provided by Receiver; draft memo re bifurcation of claims against S&W.	2.30 506.00
	DCC	Review e-mail from receiver re order re conflicts counsel.	0.20 70.00
10/11/2019	MML	Analyze bifurcation of claims against S&W; research re same; review memo from S&W re settlement issues.	4.00 880.00
	DCC	Read order from court re conflict counsel.	0.20 70.00
	DCC	E-mail exchange with receiver re conflict counsel.	0.20 70.00
10/14/2019	DCC	Review issues re case and identify follow up re research memos; review email from MMLongson re same.	0.50 175.00
	DCC	Draft e-mail re pleadings in case and note follow up needed re same.	0.20 70.00
	MML	Analyze memo re potential issues with seeking relief via turnover motion.	1.80 396.00
10/15/2019	MML	Analyze issues re turnover motion based on input and analysis from DCCastleberry.	1.00 220.00
	DCC	Review and follow up re documents in case; Review email and read and analyze updated analysis from MMLongson re potential turnover motion issues.	0.75 262.50
10/17/2019	MML	Draft Complaint general allegations.	1.25 275.00
10/18/2019	MML	Draft Complaint claims for relief sections.	1.00 220.00

RaPower-3, LLC Receivership

Page No: 3  
Statement Date: 10/31/2019  
Account No: 21868-00010  
Statement No: 57329

		Hours	
10/21/2019			
DCC	Analyze issues re turnover motion.	0.25	87.50
MML	Draft/revise Complaint general allegations and claims for relief sections.	1.00	220.00
10/22/2019			
DCC	Analyze issues in case and provide direction to MMLongson re same.	0.50	175.00
MML	Draft/revise Complaint general allegations and causes of action.	2.00	440.00
10/23/2019			
DCC	Review e-mail and documents from receiver; draft e-mail to MMLongson re complaint.	0.50	175.00
MML	Draft and finalize Complaint; draft Case Analysis Memo on claim elements and potential defenses.	4.00	880.00
10/24/2019			
DCC	Work with MMLongson re complaints and memo to client re issues to address; review e-mail and updated material from MMLongson.	0.50	175.00
MML	Revise Case Analysis Memo to address additional issues related to subsequent transferee, merchant defense, and good faith.	1.00	220.00
10/28/2019			
DCC	Edit and revise complaint in case; read and analyze documents in case; draft e-mail to receiver re analysis of claims and defenses in matter; analyze defenses in lawsuit; edit and revise case analysis memo and legal research re same; telephone conference with Receiver re legal analysis of claims and possible defenses.	3.50	1,225.00
MML	Revise Complaint per input from DCCastleberry; research re payment history to S&W.	1.25	275.00
10/29/2019			
DCC	Legal research re claim at issue re possible defenses;		

RaPower-3, LLC Receivership

Page No: 4  
Statement Date: 10/31/2019  
Account No: 21868-00010  
Statement No: 57329

		Hours	
	telephone conference with W. Klein re same; edit and revise complaint; draft e-mail to W. Klein re draft complaint; follow-up research re issues; review e-mail and documents from receiver re complaint; analyze follow-up needed and draft e-mail to receiver re same; review and respond to follow-up emails with receiver re same.	4.50	1,575.00
MML	Analyze issues re defenses; revise draft Complaint; research re subsequent transferees.	1.50	330.00
10/30/2019			
CAJ	Revise paragraph 26 of Complaint.	0.25	37.50
MML	Draft table of payments to include in Complaint; incorporate client edits and otherwise revise Complaint.	1.00	220.00
DCC	Edit and revise complaint and legal research re same; draft email to receiver re same.	1.75	612.50
10/31/2019			
MML	Review and proof final draft of Complaint.	0.50	110.00
DCC	Edit and revise complaint; review email from receiver re issues; follow up emails with receiver re amounts; finalize complaint; telephone conference with Receiver re revisions; file complaint.	2.00	700.00
	For Current Services Rendered	48.80	13,338.00
	<b>Courtesy Discount</b>		<b>-2,500.00</b>
	Net Fees after Courtesy Discount		10,838.00

## Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	20.85	\$350.00	\$7,297.50
Natalie L. Redd	1.30	150.00	195.00
Cortney A. Jones	0.25	150.00	37.50
Mitch M. Longson	26.40	220.00	5,808.00

Expenses

Computer Research Westlaw

262.40



RaPower-3, LLC Receivership

Page No: 5  
Statement Date: 10/31/2019  
Account No: 21868-00010  
Statement No: 57329

Total Expenses 262.40

Advances

10/31/2019 Filing Fees US District Court 400.00

Total Advances 400.00

Total Current Work 11,500.40

Previous Balance \$175.00

Balance Due \$11,675.40

Taxpayer ID # 84-1395129



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Page No: 1  
Statement Date: 11/30/2019  
Account No: 21868-00010  
Statement No: 57588

Snell & Wilmer

Fees

		Hours	
11/04/2019			
CAJ	Obtain registered agent information and draft e-mail to process servers for service of Summons of Complaint.	0.30	45.00
MML	Direct CAJones re obtaining summons and serving Complaints; research re initial and subsequent transferee issues.	0.50	110.00
DCC	Read email re summons follow up from MMLongson.	0.20	70.00
11/05/2019			
CAJ	Arrange for service of process of Summons and Complaint.	0.20	30.00
DCC	Review summons in case.	0.20	70.00
MML	Research re subsequent transferee defense and potential issues re statutory attorney's lien.	2.50	550.00
11/11/2019			
DCC	Read proof of service; docket answer deadline.	0.30	105.00
11/14/2019			
DCC	Read e-mail from Jeff Tuttle; draft follow up e-mail to Jeff Tuttle, etc.; review e-mail from Jeff Tuttle.	0.20	70.00

RaPower-3, LLC Receivership

Page No: 2  
 Statement Date: 11/30/2019  
 Account No: 21868-00010  
 Statement No: 57588

	Hours	
For Current Services Rendered	4.40	1,050.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	0.90	\$350.00	\$315.00
Cortney A. Jones	0.50	150.00	75.00
Mitch M. Longson	3.00	220.00	660.00

Advances

11/11/2019	Statewide Process Servers - Process Service on Snell & Wilmer	35.00
	Total Advances	35.00
	Total Current Work	1,085.00
	Previous Balance	\$11,675.40
	Balance Due	<u>\$12,760.40</u>



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Page No: 1  
Statement Date: 12/31/2019  
Account No: 21868-00010  
Statement No: 57780

Snell & Wilmer

Fees

		Hours	
12/04/2019	MML Analyze issues re necessary parties in subsequent transferee claims; legal research re same; draft memorandum summarizing research and conclusions.	4.20	924.00
	DCC Analyze issues in case; provide instruction to MMLongson re same; read memo from MMLongson re defenses and provide instruction re follow up; read edited memo from MMLongson; draft e-mail to receiver re same.	1.10	385.00
12/16/2019	DCC E-mail exchanges with Jeff Tuttle.	0.20	70.00
	For Current Services Rendered	5.50	1,379.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	1.30	\$350.00	\$455.00
Mitch M. Longson	4.20	220.00	924.00

Expenses

Computer Research Westlaw	139.19
Total Expenses	139.19

Page No: 2  
Statement Date: 12/31/2019  
Account No: 21868-00010  
Statement No: 57780

RaPower-3, LLC Receivership

Total Current Work	1,518.19
Previous Balance	\$12,760.40
Balance Due	<u>\$14,278.59</u>

Taxpayer ID # 84-1395129



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Page No: 1  
Statement Date: 10/31/2019  
Account No: 21868-00020  
Statement No: 57892

Heideman and Associates

Fees

		Hours	
10/07/2019	DCC	Read e-mail from receiver re new case; telephone conference with receiver re same; read documents re case.	1.00 350.00
10/15/2019	DCC	Review and follow up re documents in case.	0.50 175.00
10/21/2019	MML	Review litigation memo from receiver; begin draft of Complaint.	1.80 396.00
10/22/2019	DCC	Analyze issues in case and research re claims at issue; follow up with MMLongson re same.	0.30 105.00
	MML	Draft/revise Complaint general allegations and causes of action.	1.30 286.00
10/23/2019	MML	Draft and finalize Complaint; draft Case Analysis Memo identifying claim elements and potential defenses.	3.80 836.00
10/28/2019	DCC	Edit and revise complaint; analyze issues in case; research issues re defendant and possible defenses in case.	1.80 630.00

RaPower-3, LLC Receivership

Page No: 2  
 Statement Date: 10/31/2019  
 Account No: 21868-00020  
 Statement No: 57892

		Hours	
CAJ	Research Heideman & Associates; obtain Principal corporation information for same; relay same to DCCastleberry.	0.50	75.00
MML	Research re payment history to Heideman; research re proper party to sue; revise Complaint to include payment history.	2.00	440.00
10/29/2019			
DCC	Edit and revise complaint; draft e-mail to receiver re same; research re defendant; review e-mail from receiver re complaint.	1.00	350.00
10/30/2019			
MML	Check calculations of amounts sought in Complaint.	0.30	66.00
DCC	Edit and revise complaint; draft email to receiver re same.	1.30	455.00
10/31/2019			
MML	Analyze billing records and check accuracy of calculations for Complaint; review and proof final draft of Complaint.	3.00	660.00
DCC	Edit and revise complaint; review information from MMLongson re calculating amounts at issue; file complaint.	1.50	525.00
	For Current Services Rendered	20.10	5,349.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	7.40	\$350.00	\$2,590.00
Cortney A. Jones	0.50	150.00	75.00
Mitch M. Longson	12.20	220.00	2,684.00

Advances

10/29/2019	Utah.gov business entity search	1.00
10/31/2019	Filing Fees US District Court	400.00
	Total Advances	401.00
	Total Current Work	5,750.00

RaPower-3, LLC Receivership

Page No: 3  
Statement Date: 10/31/2019  
Account No: 21868-00020  
Statement No: 57892

Balance Due

\$5,750.00

Taxpayer ID # 84-1395129





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Salt Lake City, UT 84110

Page No: 1  
Statement Date: 11/30/2019  
Account No: 21868-00020  
Statement No: 57583

Heideman and Associates

Fees

		Hours	
11/04/2019			
CAJ	Draft e-mail to process servers for service of Summons and Complaint.	0.10	15.00
MML	Direct CAJones re obtaining summons and serving Complaints.	0.20	44.00
DCC	Read email re summons follow up from MMLongson.	0.20	70.00
11/05/2019			
CAJ	Arrange for service of process of Summons and Complaint.	0.20	30.00
DCC	Review summons in case.	0.20	70.00
11/08/2019			
DCC	Read returns of service and note follow up re same; follow up re service and read emails re same.	0.30	105.00
11/26/2019			
DCC	Telephone conference with Justin Heideman re case; review email from Justin Heideman.	0.40	140.00
	For Current Services Rendered	1.60	474.00

Page No: 2  
 Statement Date: 11/30/2019  
 Account No: 21868-00020  
 Statement No: 57583

RaPower-3, LLC Receivership

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	1.10	\$350.00	\$385.00
Cortney A. Jones	0.30	150.00	45.00
Mitch M. Longson	0.20	220.00	44.00

Advances

11/08/2019	Statewide Process Servers - Process Service on Justin Heideman	35.00
	Total Advances	35.00
	Total Current Work	509.00
	Previous Balance	\$5,750.00
	Balance Due	<u>\$6,259.00</u>

Taxpayer ID # 84-1395129



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Page No: 1  
Statement Date: 12/31/2019  
Account No: 21868-00020  
Statement No: 57782

Heideman and Associates

Fees

		Hours	
12/04/2019			
CAJ	Assess and organize files received from Justin Heideman and create iPro database for same; update index of file.	0.50	75.00
DCC	Meeting with Justin Heideman; analyze issues raised in meeting; follow up with receiver re same; review and respond to e-mail from Justin Heideman; review documents sent by Heideman; review and analyze documents and emails from receiver re issues in case.	2.80	980.00
12/05/2019			
DCC	Draft e-mail to Justin Heideman.	0.20	70.00
12/12/2019			
DCC	Analyze motion to dismiss; provide instruction to MMLongson re same; draft email to receiver re same.	0.70	245.00
MML	Review and analyze Motion to Dismiss.	0.80	176.00
12/13/2019			
MML	Analyze issues re Motion to Dismiss and review client's input re same.	0.50	110.00
DCC	Read e-mail from Wayne Klein re motion to dismiss complaint and read attachments re same; analyze motion and		

RaPower-3, LLC Receivership

Page No: 2  
Statement Date: 12/31/2019  
Account No: 21868-00020  
Statement No: 57782

		Hours	
	opposition to same; draft e-mail to MMLongson re opposition.	0.80	280.00
12/16/2019			
MML	Research re Rule 12(b)(6) arguments in past receivership cases; draft argument in Opposition to Motion to Dismiss.	2.00	440.00
DCC	Draft e-mail to receiver re opposition to motion to dismiss.	0.20	70.00
12/17/2019			
MML	Draft Opposition to Motion to Dismiss argument sections.	6.50	1,430.00
12/18/2019			
MML	Research re Oregon law on issue preclusion; draft Opposition to Motion to Dismiss argument, introduction, and fact sections.	6.80	1,496.00
12/19/2019			
DCC	Read e-mail from MMLongson re opposition to Motion to Dismiss.	0.20	70.00
MML	Proof and finalize draft Opposition to Motion to Dismiss for DCCastleberry review.	0.50	110.00
12/20/2019			
DCC	Edit and revise opposition to motion to dismiss; draft e-mail to MMLongson re same.	0.50	175.00
12/23/2019			
DCC	Read e-mail and updated opposition to motion to dismiss from MMLongson and analyze same.	0.50	175.00
MML	Revise Opposition to Motion to Dismiss per DCCastleberry input and edits; research re non-Ponzi actual fraud cases for citation in same.	1.80	396.00
	For Current Services Rendered	<u>25.30</u>	<u>6,298.00</u>

## Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	5.90	\$350.00	\$2,065.00
Cortney A. Jones	0.50	150.00	75.00

RaPower-3, LLC Receivership

Page No: 3  
Statement Date: 12/31/2019  
Account No: 21868-00020  
Statement No: 57782

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Mitch M. Longson	18.90	220.00	4,158.00

Expenses

Computer Research Westlaw	2,246.51
Total Expenses Thru 12/31/2019	2,246.51
Total Current Work	8,544.51
Previous Balance	\$6,259.00
Balance Due	<u>\$14,803.51</u>

Taxpayer ID # 84-1395129



136 East South Temple, Suite 1300  
Salt Lake City, Utah 84111  
(801) 363-5678  
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Wayne Klein  
RaPower-3, LLC Receivership  
KLEIN & ASSOCIATES, PLLC  
P.O. Box 1836  
Salt Lake City, UT 84110

Page No: 1  
Statement Date: 10/31/2019  
Account No: 21868-00030  
Statement No: 57353

Donald Reay, Reay Law, PLLP

Fees

		Hours	
10/30/2019			
CAJ	Prepare table for exhibit to Complaint.	0.30	45.00
MML	Draft Complaint.	0.80	176.00
DCC	Edit and revise complaint; e-mail exchanges with receiver re same; draft email to receiver re complaint.	1.00	350.00
10/31/2019			
MML	Review and proof final draft of Complaint.	0.30	66.00
DCC	Edit and revise complaint; finalize complaint; arrange for complaint to be filed.	0.50	175.00
	For Current Services Rendered	2.90	812.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	1.50	\$350.00	\$525.00
Cortney A. Jones	0.30	150.00	45.00
Mitch M. Longson	1.10	220.00	242.00

RaPower-3, LLC Receivership

Page No: 2  
Statement Date: 10/31/2019  
Account No: 21868-00030  
Statement No: 57353

Advances

10/31/2019	Filing Fees US District Court	<u>400.00</u>
	Total Advances	400.00
	Total Current Work	1,212.00
	Balance Due	<u>\$1,212.00</u>

Taxpayer ID # 84-1395129



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Wayne Klein  
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KLEIN & ASSOCIATES, PLLC  
P.O. Box 1836  
Salt Lake City, UT 84110

Page No: 1  
Statement Date: 11/30/2019  
Account No: 21868-00030  
Statement No: 57584

Donald Reay, Reay Law, PLLP

Fees

		Hours	
11/01/2019	DCC Telephone conference with court clerk re case.	0.20	70.00
11/04/2019	CAJ Obtain registered agent information and draft e-mail to process servers for service of Summons of Complaint.	0.30	45.00
	DCC Read email re summons follow up from MMLongson.	0.20	70.00
11/05/2019	CAJ Arrange for service of process of Summons and Complaint.	0.20	30.00
	DCC Review summons in case.	0.20	70.00
11/06/2019	MML Research re relation back when amending name of defendant entity.	0.60	132.00
11/07/2019	DCC Read e-mail from MMLongson and draft amended complaint and follow up re same.	0.30	105.00
11/08/2019	DCC Read returns of service and note follow up re same.	0.20	70.00



RaPower-3, LLC Receivership

Page No: 2  
Statement Date: 11/30/2019  
Account No: 21868-00030  
Statement No: 57584

		Hours	
11/20/2019			
CAJ	Confer with DCCastleberry and MMLongson re service of Amended Complaint on Reay.	0.20	30.00
DCC	Telephone conference with Donald Reay; review emails from Donald Reay; provide instruction to MMLongson re same.	0.70	245.00
11/21/2019			
MML	Research re equivalent value cases to send to opposing counsel.	1.30	286.00
DCC	Conference with Receiver re communications with defendants; Read e-mail from receiver re cases and analogous arguments re same; draft e-mail to defendant re same.	0.60	210.00
11/22/2019			
DCC	Email exchange with receiver re evidence in case; read and analyze documents re payments.	0.30	105.00
DCC	Read email and documents from receiver re payments at issue.	0.30	105.00
	For Current Services Rendered	5.60	1,573.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	3.00	\$350.00	\$1,050.00
Cortney A. Jones	0.70	150.00	105.00
Mitch M. Longson	1.90	220.00	418.00

Advances

11/08/2019	Statewide Process Servers - Process Service on Donald Reay and Reay Law PLLP		70.00
	Total Advances		70.00
	Total Current Work		1,643.00
	Previous Balance		\$1,212.00

Page No: 3  
Statement Date: 11/30/2019  
Account No: 21868-00030  
Statement No: 57584

RaPower-3, LLC Receivership

Balance Due \$2,855.00

Taxpayer ID # 84-1395129



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

Page No: 1  
Statement Date: 12/31/2019  
Account No: 21868-00030  
Statement No: 57783

Donald Reay, Reay Law, PLLP

Fees

		Hours	
12/10/2019	DCC	Read e-mail from Don Reay; read documents received from Don Reay and analyze same; telephone conference with Don Reay; review filing by opposing party; follow up e-mail exchanges with Don Reay; draft e-mail to receiver re same.	1.80      630.00
12/11/2019	DCC	Read email from Receiver and identify follow up re same; analyze statue and possible defenses; telephone conference with Wayne Klein; draft e-mail to Don Reay re follow up questions; review and analyze e-mail from Don Reay; analyze documents sent from Don Reay.	0.90      315.00
12/12/2019	DCC	Read file and draft e-mail to receiver re documents and information received.	0.30      105.00
12/13/2019	DCC	Read e-mail and attachments from receiver and analyze same.	0.40      140.00
12/16/2019	DCC	Draft e-mail to receiver re analysis of issues in case.	0.20      70.00

Page No: 2  
 Statement Date: 12/31/2019  
 Account No: 21868-00030  
 Statement No: 57783

RaPower-3, LLC Receivership

		Hours	
12/17/2019			
DCC	E-mail exchange with Don Reay.	0.20	70.00
12/20/2019			
DCC	Draft e-mail to Don Reay and note follow up re same; Review file and correspondence and telephone conference with Don Reay re billing statements needed; telephone conference with Receiver.	0.70	245.00
12/23/2019			
DCC	Read e-mail from Don Reay; read attachments re same; draft email to receiver re same; review e-mail from receiver re same.	0.50	175.00
	For Current Services Rendered	5.00	1,750.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	5.00	\$350.00	\$1,750.00

Expenses

Computer Research Westlaw	213.70
Total Expenses Thru 12/31/2019	213.70
Total Current Work	1,963.70
Previous Balance	\$2,855.00
Balance Due	<u>\$4,818.70</u>

Taxpayer ID # 84-1395129

# **EXHIBIT B-4**

**LONEPEAK**

VALUATION GROUP

36 SOUTH STATE STREET, SUITE 500  
SALT LAKE CITY, UTAH 84111

(801) 708-7700 • Fax: (801) 708-7701 •

WWW.LONEPEAKVALUATION.COM

**INVOICE****PRIVILEGED & CONFIDENTIAL**

Federal ID No. 26-2104291

Wayne Klein, Receiver  
36 S State Street  
Suite 500  
Salt Lake City, UT 84111Invoice Date: 11/01/2019  
Invoice No. 19492  
Page No. 1Account No. 1481.000  
RE: United States v. RaPower-3, LLC, et al.Fees

			Rate	Hours	
10/01/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model.	45.00	4.80	216.00
	CGO	File Review - Print copies of checks paid to 3rd party	135.00	0.50	67.50
10/03/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. Completed report on stock sales for Wayne.	45.00	4.60	207.00
	CGO	File Review - Review receivership entity payments to credit cards	135.00	0.30	40.50
10/04/2019	CGO	File Review - Review receivership entity payments to credit cards	135.00	0.50	67.50
10/07/2019	CGO	File Review - Search for updated address of 3rd party	135.00	0.25	33.75
10/09/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. Organized stock sale data.	45.00	3.90	175.50
10/15/2019	RAL	Organized stock data and prepared charts.	45.00	4.80	216.00
10/17/2019	CGO	File Review - Review contents of disc, Review checks made payable to Digital Wave Energy for endorsements	135.00	1.50	202.50
10/22/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. Prepared data pertaining to stock sales data. Also made edits to NSDP stock sales reports.	45.00	5.50	247.50
10/24/2019	LRI	Develop, create and modify schedules and analyses Meeting with Wayne and initial scans for Discover cards. Meeting with Robert as well	130.50	0.92	120.06
	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. Input data.	45.00	4.60	207.00
	CGO	File Review - Research payments made to 3rd party	135.00	0.25	33.75
10/25/2019	LRI	Develop, create and modify schedules and analyses Bankscan of			

To ensure proper credit, please include account number and statement date on remittance checks. Thank you.

Wayne Klein, Receiver  
 Account No. 1481.000  
 RE: United States v. RaPower-3, LLC,

Invoice Date: 11/01/2019  
 Invoice No. 19492  
 Page No. 2

			Rate	Hours	
		Discover Card, working on schedule for Wayne.	130.50	5.75	750.38
	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information related to stock sales.	45.00	6.40	288.00
10/28/2019	LRI	Develop, create and modify schedules and analyses of bank records and continuing creation of schedules. Determining if costs are personal, business, or uncertain	130.50	2.42	315.81
10/29/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model relating to stock sales.	45.00	0.80	36.00
	LRI	Develop, create and modify schedules and analyses. Analysis of payments, rewards, transactions, etc.	130.50	5.25	685.13
10/31/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information relating to stock sales.	45.00		2.80
		For Current Services Rendered		<u>53.04</u>	<u>3,912.68</u>

Hours - Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Total</u>
Robert Aldous, Staff	35.40	\$1,595.80
Cristian Gomez, Analyst	3.30	445.50
Luke Richins, Analyst	14.34	1,871.38

Total Current Work 3,912.68

Previous Balance \$106,430.21

Payments

10/16/2019 Retainer applied -63,916.09

Balance Due \$46,426.80

Aged Due Amounts

<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
3,912.68	22,141.50	0.00	20,372.62	0.00	0.00

**LONEPEAK**

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SALT LAKE CITY, UTAH 84111

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**INVOICE****PRIVILEGED & CONFIDENTIAL**

Federal ID No. 26-2104291

Wayne Klein, Receiver  
36 S State Street  
Suite 500  
Salt Lake City, UT 84111Invoice Date: 12/02/2019  
Invoice No. 19886  
Page No. 1Account No. 1481.000  
RE: United States v. RaPower-3, LLC, et al.Fees

			Rate	Hours	
11/01/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model pertaining to stock shares.	45.00	5.80	261.00
11/05/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. Prepared the stock sale database	45.00	0.30	13.50
11/12/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. Prepared chart for stock sales.	45.00	5.30	238.50
	CGO	File Review - Review file listing report for Receiver	135.00	0.40	54.00
11/14/2019	RAL	Develop, create and modify schedules and analyses. Prepared stock charts.	45.00	0.40	18.00
11/15/2019	RAL	Develop, create and modify schedules and analyses. Prepared stock charts.	45.00	1.00	45.00
11/20/2019	CGO	File Review - Lookup bank accounts for Receiver	135.00	0.30	40.50
11/21/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. Prepared stock sale report charts and graphs	45.00	5.70	256.50
11/22/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. Prepared stock sale report charts and graphs	45.00	4.00	180.00
	CGO	File Review - Print copies of checks to 3rd party	135.00	0.30	40.50
11/26/2019	RAL	Discussion with client.	45.00	0.80	36.00
11/27/2019	RAL	Prepared additional data for stock reports chart.	45.00	4.30	193.50

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Wayne Klein, Receiver  
 Account No. 1481.000  
 RE: United States v. RaPower-3, LLC,

Invoice Date: 12/02/2019  
 Invoice No. 19886  
 Page No. 2

			Rate	Hours	
11/30/2019	RAL	Prepared additional data for stock reports chart.	45.00	3.00	135.00
		For Current Services Rendered		<u>31.60</u>	<u>1,512.00</u>

Hours - Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Total</u>
Robert Aldous, Staff	30.60	\$1,377.00
Cristian Gomez, Analyst	1.00	135.00

Expenses

11/15/2019	Copying cost (\$.05/copy) - Numbered documents (3,708); Binders (392); Unnumbered documents (2,237); Additional copies (279)	<u>330.80</u>
	Total Expenses	<u>330.80</u>
	Total Current Work	1,842.80
	Previous Balance	\$46,426.80
	Balance Due	<u>\$48,269.60</u>

<u>Aged Due Amounts</u>					
<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
1,842.80	3,912.68	22,141.50	0.00	20,372.62	0.00

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# INVOICE

**PRIVILEGED & CONFIDENTIAL**

Federal ID No. 26-2104291

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

Invoice Date: 01/02/2020  
Invoice No. 19991  
Page No. 1

Account No. 1481.000  
RE: United States v. RaPower-3, LLC, et al.

Fees

			Rate	Hours	
12/10/2019	RAL	Data Entry - Adjustments to database.	45.00	1.20	54.00
12/12/2019	RAL	Data Entry - Adjustments to database.	45.00	1.80	81.00
12/13/2019	RAL	Data Entry - Adjustments to database.	45.00	0.30	13.50
12/16/2019	CGO	Review of Robert Johnson checks	135.00	0.25	33.75
12/30/2019	CGO	Review of OTC Stock Journal	135.00	0.50	67.50
		For Current Services Rendered		4.05	249.75

Hours - Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Total</u>
Robert Aldous, Staff	3.30	\$148.50
Cristian Gomez, Analyst	0.75	101.25

Total Current Work 249.75

Previous Balance \$48,269.60

Balance Due \$48,519.35

Aged Due Amounts

<u>0-30</u>	<u>31-60</u>	<u>61-90</u>	<u>91-120</u>	<u>121-180</u>	<u>181+</u>
249.75	1,842.80	3,912.68	6,612.46	35,901.66	0.00

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