

EXHIBIT B-1

RaPower-3, LLC
Time Detail for Receiver and Klein & Associates
April 1, 2021 to June 30, 2021

Date	Worker	Hours	Rate	Amount	Description	Category
4/1/2021	WK	0.2	250.00	50.00	Call with state fire marshal on hazardous chemicals; notes of call.	Investigation
4/1/2021	WK	6.4	250.00	1,600.00	Begin financial summary of transactions during quarter; verify which bid deposits were credited against closings; begin work on report narrative; review files, search PACER.	Status Report
4/1/2021	WK	0.4	250.00	100.00	Call with DOJ on Shepard home, Plaskolite (.2); read Kontos opposition to summary judgment (.2).	Litigation
4/2/2021	WK	0.3	250.00	75.00	Reconcile monthly bank statements.	Financial analysis
4/5/2021	WK	0.1	0.00	0.00	Record insurance refund; read Utah Division of Natural Resources notice of transfer of water right. (Time not billed.)	Case Administration
4/5/2021	WK	0.3	250.00	75.00	Review tax return, review potential errors.	Tax Preparation
4/5/2021	WK	1.9	250.00	475.00	Read request by Heideman for extension of time for expert report, give directions to MC2B; request information from LPV on sources of financial information; find and send additional discovery documents (1.3); read draft letter from MC2B to Reay, send comments to D. Castleberry with redline (.6).	Litigation
4/6/2021	WK	1.0	250.00	250.00	Call with Envirocare on hazardous waste; notes of call; send information to Envirocare on location, getting access, other contamination.	Investigation
4/6/2021	WK	0.5	250.00	125.00	Send questions to BRG on tax returns re: value of real property, send copies relevant section of 2019 return.	Tax Preparation
4/6/2021	WK	1.1	250.00	275.00	Work on, finish first draft of status report.	Status Report
4/7/2021	WK	0.2	250.00	50.00	Call with S. Bowers on delay in payment; notes of call; send wiring instructions.	Asset Recovery
4/7/2021	WK	0.1	0.00	0.00	Pay California utility expense, cancel service. (Time not billed.)	Financial analysis
4/7/2021	WK	1.8	250.00	450.00	Revise and edit draft report; send to DOJ and Parr Brown for review.	Status Report
4/7/2021	WK	0.3	250.00	75.00	Read emails between attorneys on dates for expert deposition, send comments to D. Castleberry with directions on responding to Heideman request.	Litigation

4/8/2021 WK	0.2	250.00	50.00	Call with T. Belchak on Oasis survey, closing on purchase of 80 acre parcel, upcoming auctions.	Asset Disposition
4/8/2021 WK	1.3	250.00	325.00	Review revised settlement offer by Lunn, respond with additional questions (.3); call with R. Greathouse on vehicles, property sales (.2); call with Steve Bowers, create new settlement agreement, send (.8).	Asset Recovery
4/8/2021 WK	1.7	250.00	425.00	Calls with lens purchaser on tax consequences of lens deduction, send Olsen tax court ruling .3); read tax court ruling in Olsen case; send to Parr Brown and Manning Curtis with comments.	Investigation
4/8/2021 WK	0.5	250.00	125.00	Read response from BRG on tax filings; get new page for return; sign and send tax return (.4); log settlement payment, pay invoice, cancel utilities (.1).	Financial analysis
4/9/2021 WK	2.1	250.00	525.00	Review signed agreements for extension of Shepard deadline to pay for home equity (.1); review settlement offer by Plaskolite; review file and authorities cited by Plaskolite; legal research; send extensive response on suggested strategy (2.0).	Asset Recovery
4/9/2021 WK	0.1	250.00	25.00	Review Randale Johnson account statements, update log.	Investigation
4/9/2021 WK	0.4	250.00	100.00	Get filed copy of notice of sale results for Abraham home; revise status report; review suggested changes by J. Balls and DOJ, revise report.	Status Report
4/12/2021 WK	0.6	250.00	150.00	Review title information from DMV on boat and trucks; complete title application, send information to Sahara Motors.	Asset Disposition
4/12/2021 WK	0.1	250.00	25.00	Review accounts statements for LaGrand Johnson, update tracking log.	Investigation
4/12/2021 WK	0.5	0.00	0.00	Review and index NSDP documents; record stock transactions (payment dates; add information to index of board minutes). (Time not billed.)	Investigation
4/12/2021 WK	0.1	250.00	25.00	Review insurance cancellation notices, log settlement payment.	Financial analysis
4/13/2021 WK	2.3	250.00	575.00	Read information on settlement offer by Lunn, review files, draft settlement agreement, send to J. Balls (1.7); call with J. Balls on Bowers, email G. Shepard on deadline for payment (.6).	Asset Recovery
4/13/2021 WK	0.6	250.00	150.00	Gather information on false statements by NSDP in filings for sales of stock pursuant to Rule 144, send to Parr Brown with comments.	Investigation
4/13/2021 WK	2.4	0.00	0.00	Work on index of NSDP documents (Box 19). (Time not billed.)	Investigation
4/14/2021 WK	0.6	250.00	150.00	Read response by M. Lehr on pattern of NSDP sales of IAS stock; research Utah statutes on PUA.	Investigation
4/14/2021 WK	3.1	250.00	775.00	Call with DOJ (.7); review draft recovery requests to LaGrand Johnson, create redline; research files and gather documents to produce in discovery (2.3); read Heideman motion for extension of time, respond to Manning Curtis on how to respond (.1).	Litigation

4/15/2021 WK	0.1	250.00	25.00	Email L. Mathews on getting surveyor; texts with T. Belchak on auction of Oasis property.	Asset Disposition
4/15/2021 WK	1.3	250.00	325.00	Read order of contempt against Glenda Johnson, Olsen, Hamblin re: liens; emails with M. Lehr on next steps, send order for web posting.	Asset Recovery
4/15/2021 WK	0.2	250.00	50.00	Log settlement payments, confirm to Blackburn he is paid in full; review insurance cancellation payment.	Financial analysis
4/15/2021 WK	1.8	250.00	450.00	Scan and send documents to Parr Brown in response to LaGrand Johnson discovery request (.2); review revised discovery requests from Receiver to LaGrand, Randale, Glenda Johnson and Matt Shepard; create redlines; respond to J. Balls (1.6).	Litigation
4/16/2021 WK	0.2	250.00	50.00	Read email from L. Mathews on survey of warehouse property, authorize engagement; respond to T. Belchak; check PACER for sale order on warehouse.	Asset Disposition
4/16/2021 WK	0.3	250.00	75.00	Read Receiver's draft opposition to Heideman motion to extend discovery deadline; create redline, send to D. Castleberry with comments.	Litigation
4/17/2012 JS	0.1	120.00	12.00	Post updates on website.	Case Administration
4/19/2021 WK	1.6	250.00	400.00	Read summary judgment order on Trudy Shepherd (.5); email Parr Brown and DOJ with comments on order (.8); download additional summary judgments, log information in tracking log; emails with Parr Brown and DOJ (.3)	Asset Recovery
4/19/2021 WK	0.1	250.00	25.00	Send information to IRS on Olsen and Hamblin depositions.	Investigation
4/19/2021 WK	0.1	0.00	0.00	Pay invoice for tax return. (Time not billed.)	Financial analysis
4/20/2021 WK	0.3	250.00	75.00	Receive signed settlement agreement from Lunn, update log; review draft judgment, create redline, send to J. Balls (.2); record Chase settlement payment, sign acknowledgement; respond to M. Lehr on Olsen payment (.1).	Asset Recovery
4/21/2021 WK	0.2	250.00	50.00	Emails with J. Balls and DOJ on Plaskolite; get discovery production; research relevant key dates.	Investigation
4/21/2021 WK	0.9	250.00	225.00	Call with DOJ on Plaskolite, notes of call; send notes to J. Balls (.7); research case holdings on inquiry notice, send summary to DOJ (.2).	Litigation
4/22/2021 WK	0.2	250.00	50.00	Call with DPI Land on status, send copy of order with information about next steps; read letter from potential property bidder.	Asset Disposition
4/22/2021 WK	0.5	0.00	0.00	Obtain cashier's check for distribution to DOJ, send via overnight mail. (Time not billed.)	Financial analysis

4/22/2021 WK	0.1	250.00	25.00	Record settlement payment, DOJ distribution, expense payment.	Financial analysis
4/22/2021 WK	0.9	250.00	225.00	Begin reading NSDP response to Receiver discovery request, make notes of issues to follow up on.	Litigation
4/23/2021 WK	0.6	250.00	150.00	Review files and check PACER; email G. Shepard and S. Bowers on default and next steps; respond to G. Shepard on expected lawsuit against Receiver and other litigation; call with DOJ.	Asset Recovery
4/23/2021 WK	1.2	250.00	300.00	Read emails from D. Castleberry on Reay privilege; read Reay letter, respond to D. Castleberry (.2); call with D. Castleberry on strategy with Reay request for return of documents (.9); notes of issues to address; review Reay errata sheet from his deposition (.1).	Litigation
4/26/2021 WK	0.2	250.00	50.00	Call with T. Belchak on getting survey of warehouse property.	Asset Disposition
4/26/2021 WK	0.1	250.00	25.00	Read order extending deadline for Heideman expert report, send to Lone Peak.	Litigation
4/27/2021 WK	0.4	250.00	100.00	Emails with G. Shepard with proposal for maximizing value of home and selecting real estate agent.	Asset Disposition
4/27/2021 WK	1.9	250.00	475.00	Call with D. Castleberry on settlement offer by Reay, strategy to pursue (.5); video meeting with Mark Shepard and J. Balls to discuss settlement; discussion with J. Balls on Plaskolite, Chaston settlement, approval of property sales.	Asset Recovery
4/28/2021 WK	2.0	250.00	500.00	Get order approving sale of Warehouse, set auction date, revise publication notice, send for publication and web posting; notify agent; send notice to other bidders; emails with L. Mathews on survey (1.3); review file, prepare notice of sale results for 80 acre parcel (#4648).	Asset Disposition
4/28/2021 WK	0.3	250.00	75.00	Review vehicle valuation reports from Sahara Motors, send to DMV; update logs.	Asset Recovery
4/28/2021 WK	4.2	250.00	1,050.00	Finish review of NSDP discovery response, send comments to Parr Brown; research USPTO records on Randale Johnson; list deposition questions for NSDP, send to Parr Brown (3.8); begin review of documents produced by Plaskolite re: internal investigation (.4).	Litigation
4/29/2021 WK	3.9	250.00	975.00	Read order denying summary judgment on Ina Newman; respond to M. Lehr; read Plaskolite (.1); read internal documents produced by Plaskolite; create timeline; identify key documents and events (3.8).	Litigation
4/30/2021 WK	2.9	250.00	725.00	Research; gather information on NSDP sales of stock, payments of invoices.	Investigation
4/30/2021 WK	0.2	250.00	50.00	Record Hamblin contempt payment, purchase option payment by 8Minute Energy; log settlement payments, identify delinquencies.	Financial analysis

4/30/2021 WK	0.9	250.00	225.00	Finish comments to J. Balls on contents of Plaskolite documents, send to J. Balls (.9); read draft letter to Don Reay on his requested clawback of documents and privilege claims, send comments to D. Castleberry.	Litigation
5/1/2021 WK	0.8	250.00	200.00	Work creating structure for analysis of money flows through NSDP.	Investigation
5/3/2021 WK	0.6	250.00	150.00	Emails with G. Shepard on home; contact utility providers, get utilities put in Receiver name.	Asset Disposition
5/3/2021 WK	0.5	0.00	0.00	Visit Shepard home; discussions with Matt Shepard. (Time not billed.)	Asset Disposition
5/3/2021 WK	3.2	250.00	800.00	Work on money flow chart showing funds transferred through NSDP.	Investigation
5/3/2021 WK	0.2	250.00	50.00	Reconcile bank statements; record settlement payments.	Financial analysis
5/3/2021 WK	0.3	250.00	75.00	Revise status report, send to Parr Brown for filing.	Status Report
5/3/2021 WK	0.2	250.00	50.00	Emails with M. Lehr on settlement with Freeborn; review her financial information; emails with D. Castleberry on Reay settlement offer.	Litigation
5/4/2021 WK	1.5	250.00	375.00	Emails with G. Shepard on home, lawn care, insurance, furniture, sale plans (.3); read information from Shepard on home; research recommended broker, call with broker; emails with Shepard; make list of items to address in meeting with broker, send copies of appraisals (.7); read Parr Brown memo on patent disclaimers; prepare revised disclaimer form (.5).	Asset Disposition
5/4/2021 WK	1.5	250.00	375.00	Review settlement offer by Day/IFS; review file, draft settlement agreement, send to J. Balls with comments (1.1); read email and legal cases on getting access to bank records, effect of privacy laws (.4).	Asset Recovery
5/4/2021 WK	0.6	250.00	150.00	Review M. Lehr changes to draft report; create redline to show changes; sign and send for filing.	Status Report
5/4/2021 WK	0.6	250.00	150.00	Work on analysis of NSDP payment flow.	Investigation
5/4/2021 WK	1.1	250.00	275.00	Review email search terms proposed by NSDP, respond to M. Lehr with comments and changes.	Litigation
5/5/2021 WK	1.9	250.00	475.00	Email Parr Brown on patent disclaimers, send questions about possible approaches (.4); meet with listing agent and Shepard at Shepard home; discuss terms for listing agreement, identify work to be performed (1.5).	Asset Disposition
5/5/2021 WK	0.5	250.00	125.00	Read information on Kirk Newman settlement offer; review file; respond with suggested approach.	Asset Recovery
5/5/2021 WK	1.2	250.00	300.00	Work on analysis of NSDP payment flow.	Investigation
5/5/2021 WK	0.1	250.00	25.00	Log settlement payment, utility refund; check status of settlement payments due.	Financial analysis
5/5/2021 WK	1.1	250.00	275.00	Call with DOJ, send case rulings (.9); email M. Lehr on Freeborn litigation strategy; list deposition questions for NSDP (.2).	Litigation

5/6/2021 WK	0.6	250.00	150.00	Email Shepard listing broker with list of terms to include in listing agreement (.2); send payment to Matt Shepard for lawn care, with comments (.1); respond to DPI Land on auction (.3).	Asset Disposition
5/6/2021 WK	0.7	250.00	175.00	Respond to M. Lehr on claims being asserted against Freeborn, what records are needed; email Lone Peak requesting information (.3); emails with J. Balls on Plaskolite, send insolvency report (.1); review new vehicle titles, sign and send to Sahara Motors; update log (.3).	Asset Recovery
5/6/2021 WK	2.3	250.00	575.00	Read new KSL news story on RaPower, send to DOJ with comments (.3); work on NSDP payment flow (2.0).	Investigation
5/6/2021 JS	0.2	120.00	24.00	Post updates on website.	Case Administration
5/7/2021 WK	5.5	250.00	1,375.00	Work on analysis of NSDP payment flow.	Investigation
5/7/2021 WK	0.1	250.00	25.00	Get information from disposal company on cyanide disposition, respond.	Case Administration
5/7/2021 WK	0.2	250.00	50.00	Read settlement offer from Reay, respond to D. Castleberry on counteroffer.	Litigation
5/8/2021 WK	0.6	250.00	150.00	Work on analysis of NSDP payment flow.	Investigation
5/10/2021 WK	6.4	250.00	1,600.00	Work on analysis of NSDP account statements and payment flows (3.0); review files, select documents to use as exhibits in deposition and trial against NSDP (3.4).	Investigation
5/10/2021 WK	1.4	0.00	0.00	Work on analysis of NSDP payment flow. (Time not billed.)	Investigation
5/10/2021 WK	0.1	250.00	25.00	Review Lagrand monthly account statements; update tracking log, respond to S. Paul.	Financial analysis
5/11/2021 WK	0.2	250.00	50.00	Respond to M. Ulrich on terms for listing agreement; respond to Matt Shepard on new dishwasher, sprinkler repairs.	Asset Disposition
5/11/2021 WK	0.5	250.00	125.00	Analyze hardship affidavit for Kinsey, research home value, respond to J. Balls on settlement offer.	Asset Recovery
5/11/2021 WK	4.1	250.00	1,025.00	Gather documents; prepare memo to DOJ re: NSDP conduct, send.	Investigation
5/11/2021 WK	0.1	250.00	25.00	Review and update logs for Randale Johnson account statements.	Financial analysis
5/11/2021 WK	0.7	250.00	175.00	Read NSDP motion to withdraw from representing Glenda Johnson, send comments to J. Balls; emails with Parr Brown on contempt fee application.	Litigation
5/12/2021 WK	2.8	250.00	700.00	Meet T. Belchak at Shepard home, show home, discuss sale terms (1.8); review Belchak offer for home; call with G. Shepard; prepare addendum to counteroffer; emails with G. Shepard on whether to list the home or accept offer and auction; send listing agreement and counteroffer (1.0).	Asset Disposition

5/12/2021 WK	0.1	250.00	25.00	Review new settlement offer from Kinsey, respond; respond to new offer from Reay.	Asset Recovery
5/12/2021 WK	2.5	250.00	625.00	Work on analysis of NSDP payment flow.	Investigation
5/12/2021 WK	0.1	250.00	25.00	Review and log settlement payments.	Financial analysis
5/12/2021 WK	0.5	250.00	125.00	Respond to J. Balls on request to meet with snow and Taylor; emails Lone Peak Valuation on depositions dates for Plaskolite; read Plaskolite notice of 30(b)(6) deposition of Receiver, gather documents for deposition.	Litigation
5/13/2021 WK	1.0	250.00	250.00	Review and pay bills for repairs at Shepard home (.1); review and sign listing agreement and MLS data summary; emails with broker; email J. Dunn rejecting Belchak offer; respond to broker on when to accept offers.	Asset Disposition
5/13/2021 WK	3.0	250.00	750.00	Gather information to prepare for settlement meeting with Snow & Taylor; gather examples of NSDP stock sale proceeds not deposited into NSDP trust account; find examples of fraud and false regulatory filings relating to NSDP stock sales.	Investigation
5/13/2021 WK	2.8	250.00	700.00	Work on quarterly litigation status report.	Status Report
5/14/2021 WK	1.2	250.00	300.00	Find documents showing Taylor and Snow officer roles at IAS, their approval of corporate actions.	Investigation
5/14/2021 WK	0.1	250.00	25.00	Read, sign, and send contract for EnviroCare to perform testing phase on cyanide.	Case Administration
5/14/2021 WK	3.1	250.00	775.00	Research litigation case statuses on PACER, download judgments and case rulings; finish draft of litigation status report, send to Parr Brown.	Status Report
5/17/2021 WK	0.3	250.00	75.00	Email broker and Shepard on property cleanup, what to leave on property.	Asset Disposition
5/17/2021 WK	1.3	250.00	325.00	Review settlement offer by Day, respond with new offer (.1); prepare summary of events showing Taylor and Snow officer roles at IAS (1.2).	Asset Recovery
5/17/2021 WK	0.7	250.00	175.00	Discuss with Lone Peak dates for depositions of expert; inform J. Balls; discuss how to respond to Heideman expert request for work files in native format; review and send email and 2010 report showing work done by Lone Peak.	Litigation
5/18/2021 WK	0.2	250.00	50.00	Emails with Matt Shepard on repairs to home, hauling off furnishings remaining in the home.	Asset Disposition
5/18/2021 WK	2.6	250.00	650.00	Meet with C. Snow, C. Taylor at NSDP to discuss settlement.	Asset Recovery
5/18/2021 WK	0.8	250.00	200.00	Instruct LPV on data input for NSDP stock sales.	Investigation
5/18/2021 WK	0.1	250.00	25.00	Emails with J. Balls on Plaskolite deposition of Lone Peak; whether to seek mediation.	Litigation

5/19/2021 WK	0.2	250.00	50.00	Emails with Matt and Greg Shepard on home contents, hauling away remaining items.	Asset Disposition
5/19/2021 WK	3.4	250.00	850.00	Review Taylor and Snow files; create list of admissions and representations that would be required as part of a settlement agreement for Taylor and Snow; search corporate records; revise and edit list of settlement conditions, send to s. Paul.	Asset Recovery
5/19/2021 WK	0.8	250.00	200.00	Read emails on Heideman request for deposition of Hoffman, corrections to Lone Peak expert report (.1); call with DOJ (.7).	Litigation
5/20/2021 WK	4.7	250.00	1,175.00	Work at Shepard home with waste hauler; make repairs to home; approve sheetrock repairs; notify broker of status.	Asset Disposition
5/20/2021 WK	1.0	250.00	250.00	Review settlement offer from Mark Shepard, respond to J. Balls; send inquiry to J. Balls on Plaskolite and litigation status report (.1); draft settlement agreement for Mark Shepard, calculate unusual payment schedule, send to J. Balls (.9).	Asset Recovery
5/20/2021 WK	0.1	250.00	25.00	Review J. Balls changes to litigation status report, approve filing.	Status Report
5/21/2021 WK	0.1	250.00	25.00	Emails with J. Balls and R. Hoffman on Plaskolite deposition of Hoffman.	Litigation
5/24/2021 WK	0.7	250.00	175.00	Review settlement offer by Woodson, draft settlement agreement, send to J. Balls with comments.	Asset Recovery
5/24/2021 WK	0.1	250.00	25.00	Pay utility invoices, log settlement payments; emails on Lone Peak deposition.	Financial analysis
5/25/2021 WK	0.3	250.00	75.00	Read settlement offer by Day; calculate new amounts for installment payments of settlement amount; revise settlement agreement.	Asset Recovery
5/25/2021 WK	1.0	250.00	250.00	Call with M. Lehr on strategy for Ina Newman trial (.6); read emails from Heideman, prepare a scan of contents of Receiver files re: communications with lens purchasers; respond to D. Castleberry on other inquiries re: Lone Peak expert report (.4).	Litigation
5/26/2021 WK	0.1	250.00	25.00	Call with T. Belchak on warehouse, send information on addresses for properties.	Asset Disposition
5/26/2021 WK	0.4	250.00	100.00	Sign new vehicle titles received from DMV, update log, send to Sahara Motors; email Sahara on status of remaining vehicles.	Asset Recovery
5/26/2021 WK	1.3	250.00	325.00	Discuss with D. Castleberry how to respond to issues raised by Heideman re: expert report, claimed conflict of interest, giving native Excel files (.5); discuss with Lone Peak discrepancies claimed by Heideman, find financial information for Lone Peak (.7); emails with J. Balls on depositions of multiple parties in Plaskolite case (.1).	Litigation

5/27/2021 WK	0.6	250.00	150.00	Sign settlement agreement for Mark Shepard, respond to J. Balls with comments; prepare settlement agreement for K. Newman, send to J. Balls with instructions.	Asset Recovery
5/27/2021 WK	0.5	250.00	125.00	Read appeal docketing statement by Roe, send comments to J. Balls on appeal issues.	Litigation
5/28/2021 WK	0.2	250.00	50.00	Review file; email 8minute Energy on cancelation of auction, next steps.	Asset Disposition
5/28/2021 WK	0.6	250.00	150.00	Read fee application for Anstram contempt, create redlines of documents, sign revised declaration; review proposed order; comments to M. Lehr.	Asset Recovery
5/28/2021 WK	0.1	0.00	0.00	Log settlement payments, update tracking log. (Time not billed.)	Financial analysis
6/1/2021 WK	0.8	250.00	200.00	Receive affidavits of publication, pay invoices; receive bid deposit for Oasis warehouse; respond to T. Belchak on conditions for sale; prepare auction bid forms.	Asset Disposition
6/1/2021 WK	0.1	250.00	25.00	Deposit property settlement checks; review settlement agreement for K. Newman; email J. Balls on Mark Shepard (.4); review changes to K. Newman settlement agreement, review draft confession of judgment; respond to J. Balls (.1).	Asset Recovery
6/1/2021 WK	0.2	250.00	50.00	Reconcile bank statements.	Financial analysis
6/1/2021 WK	0.2	250.00	50.00	Review Plaskolite subpoena for 30(b)(6) deposition of Receiver, list topics for document review (.1); review draft email from D. Castleberry to Heideman, create redline of suggested changes, send (.1).	Litigation
6/2/2021 WK	0.2	250.00	50.00	Call with T. Belchak, J. Dunn; find information on prior property sale to Belchak.	Asset Disposition
6/2/2021 WK	2.2	250.00	550.00	Respond to D. Castleberry on Heideman expert report (.3); call with DOJ, notes of call (.7); email Parr Brown requesting research of legal question (.4); Review M. Lehr email on discovery schedule for NSDP, call to discuss strategy (.4); begin reading Lone Peak expert report on RaPower insolvency (.4).	Litigation
6/3/2021 WK	2.2	250.00	550.00	Conduct auction of Oasis warehouse; discuss potential sale of lenses with buyer, discuss timing of closing on property sale; discuss bidding procedure with other bidder, get bid documents signed; inspect warehouse, discussion with person removing items from property.	Asset Disposition
6/3/2021 WK	4.4	0.00	0.00	Travel to and from Fillmore for property auction. (Time not billed.)	Asset Disposition

6/4/2021 WK	0.8	250.00	200.00	Review warehouse survey, send payment for survey; send payment for sheetrock repair at Shepard home; send information to L. Mathews on survey and cleanup of warehouse; send closing information on warehouse to title company; respond to G. Shepard on home insurance; send pictures of Plaskolite lenses to Parr Brown.	Asset Disposition
6/4/2021 WK	0.6	250.00	150.00	Review information on Kinsey settlement, draft settlement agreement; review file, send draft agreement with comments.	Asset Recovery
6/4/2021 WK	0.4	250.00	100.00	Finish reading Lone Peak report (in preparation for Plaskolite deposition).	Litigation
6/5/2021 WK	1.8	0.00	0.00	Travel to Shepard home; meet pond cleaner, pay cleaner. (Time not billed.)	Asset Disposition
6/5/2021 WK	2.2	250.00	550.00	Draft motion to approve settlements (1.3); begin drafting motion to assign judgments (.9)	Asset Recovery
6/7/2021 WK	0.4	250.00	100.00	Email broker for Shepard home on cleaning, ponds, sheetrock work, and next steps (.1); review email from Juab Title on error in legal description of property in order approving sale; call with Juab Title, review updated title report.	Asset Disposition
6/7/2021 WK	0.2	250.00	50.00	Record settlement payments received; update draft motion to approve settlements; notify J. Balls of payments received; review and pay utility bill.	Financial analysis
6/7/2021 WK	5.3	250.00	1,325.00	Review emails from Heideman on new expert reports; read two expert reports, make notes of flaws in reports; call with D. Castleberry on strategy; discuss with Lone Peak Valuation the expected topics of Heineman's deposition of R. Hoffman (.5); prepare memo to D. Castleberry on flaws in Heideman expert reports by Adkisson and Boley (1.5); preparation of Hoffman for deposition (1.5); read Hamblin notice of appeal, Glenda Johnson notice of appearance (1.3); call with D. Castleberry on Reay production of documents, discuss filing motion to compel, missing documents; read proposed emails to Reay, send comments (.5).	Litigation
<u>6/8/2021 WK</u>	0.3	250.00	75.00	Work drafting motion to assign judgments.	Asset Recovery
6/8/2021 WK	0.9	250.00	225.00	Review timeline of NSDP sales of IAS stock; identify key IAS events during time of stock sales, create list.	Investigation

6/8/2021 WK	3.2	250.00	800.00	Review document index for references to Cobblestone (.1); call with R. Hoffman re: beneficiaries of Receivership, status of lens purchasers (.1); call with Millard County attorney on Oasis sale; read emails from D. Castleberry on Heideman & Reay (.1); work on memo to Manning Curtis on Heideman experts; find and send documents to Hoffman for deposition preparation (.7); find Plaskolite documents, send to J. Balls; finish and send comments to D. Castleberry on Heideman experts; review Hoffman list of documents to use in deposition responses; review Plaskolite documents in preparation for receiver deposition (2.2).	Litigation
6/9/2021 WK	0.2	250.00	50.00	Respond to listing broker on cleanup of Shepard home.	Asset Disposition
6/9/2021 WK	2.1	250.00	525.00	Work on motion to assign judgments (.3); review hardship affidavit for Armand, respond to J. Balls (.3); call with C. Gomez on pro forma balance sheet for Cobblestone; review Cobblestone files to identify dates of events (.2); work on motion to assign judgments, send to Parr Brown with comments (1.3).	Asset Recovery
6/9/2021 WK	2.6	250.00	650.00	Research NSDP role in SEC litigation; work compiling list of key events; research NSDP payments to IRS; research files for documents showing payments on Zions bank loan; begin memo to M. Lehr on Zions bank transactions.	Investigation
6/9/2021 WK	2.1	250.00	525.00	Send information to J. Balls from G. Peterson files on Plaskolite; attend deposition of R. Hoffman by Plaskolite; discussions with J. Balls (2.0); call with J. Balls on Plaskolite cancelation of deposition of Randale Johnson, whether receiver should depose him; review transcript of Randale prior deposition, comments to J. Balls.	Litigation
6/10/2021 WK	1.0	250.00	250.00	Search files for transfer agent documents showing transfers of stock from NSDP to Hamilton.	Investigation
6/10/2021 WK	0.2	250.00	50.00	Review account statements for Randale, LaGrand; update logs; respond to S. Paul; verify replacement of money; pay for home cleaning.	Financial analysis
6/10/2021 WK	5.0	250.00	1,250.00	Review J. Balls proposed deposition questions for Plaskolite; create redline, send to J. Balls with comments (.4); deposition of receiver by Plaskolite (4.5); review new document production by Plaskolite (.1).	Litigation
6/11/2021 WK	0.2	250.00	50.00	Inspect Shepard home; clean leaves and debris from upper deck.	Asset Disposition
6/11/2021 WK	0.6	250.00	150.00	Search for records of NSDP transfers of stock to Hamilton (.2); revise memo to M. Lehr on Zions Bank (.4).	Investigation
6/11/2021 WK	5.3	250.00	1,325.00	Deposition of Plaskolite 30(b)(6) witness (Kupchick).	Litigation

6/14/2021 WK	0.4	250.00	100.00	Log settlement payments; review and pay Shepard utilities; emails to J. Balls on settlement deadlines for Taylor, Snow, and Kinsey.	Financial analysis
6/14/2021 WK	0.2	250.00	50.00	Refund bid deposit by T. Belchak; emails with broker and Shepard on home.	Asset Disposition
6/14/2021 WK	0.9	250.00	225.00	Read emails on Armand appeal; review offer by Zeigler, respond; check for Glenda submission on sources of real estate purchases; review information from Kinsey (seeking more time to pay); respond to J. Balls on alternative payment plan; send information to J. Balls on Shepherd appeal (.3); draft and send settlement agreement for Zeigler (.3).	Asset Recovery
6/14/2021 WK	0.7	250.00	175.00	Discuss with R. Hoffman report by Heideman expert (Rasmussen) (.2); read T. Shepherd appeal brief, make note of comments (.5).	Litigation
6/15/2021 WK	0.5	250.00	125.00	Get signed settlement agreement for Zeigler; revise Kinsey settlement agreement, send with comments; update logs; revise and send motion to approve settlements.	Asset Recovery
6/15/2021 WK	2.1	250.00	525.00	Find 1099's issued to NSDP (.2); search for, print all 10K's and 10Q' for 2003-2012 for review as to disclosures during period of NSDP stock sales.	Investigation
6/15/2021 WK	2.5	250.00	625.00	Check whether T. Shepherd filed appeal brief with 10th Circuit, send comments to Parr Brown on appeal brief (1.2); read Rasmussen expert report on RaPower solvency; list points to address; emails with Lone Peak about Rasmussen report (.1.3).	Litigation
6/16/2021 WK	0.1	250.00	25.00	Review email from title company re: error in order approving sale of warehouse, respond; email J. Balls re: no necessity to file motion to correct order.	Asset Disposition
6/16/2021 WK	0.4	250.00	100.00	Call with D. Castleberry on Heideman "meet and confer" re: disclosing receiver communications with DOJ; how to proceed; discuss legal experts, report by Sage expert.	Litigation
6/17/2021 WK	1.2	250.00	300.00	Meet with T. Belchak re: buying Plaskolite plastic in warehouse.	Asset Disposition
6/17/2021 WK	0.4	250.00	100.00	Call with D. Castleberry on Heideman/Reay request for receiver communications with DOJ; deadline for MSJ (.3); call, email with J. Balls on court mediation of appeals (.1).	Litigation
6/18/2021 WK	0.2	250.00	50.00	Call with Colton Hunter on warehouse insurance inspection report, read report.	Asset Disposition
6/18/2021 WK	0.3	250.00	75.00	Create template to capture relevant information from forms 10K (re: NSDP disclosures of material information).	Investigation

6/18/2021 WK	2.9	250.00	725.00	Get information on 10th Circuit appeal mediations; check PACER for Glenda filings (.4); Litigation read Heideman request for DOJ communications; compile list of all notes and emails with DOJ, respond to D. Castleberry; prepare suggested response to Heideman, send (2.5).	
6/19/2021 WK	0.3	250.00	75.00	Read IAS S-8 registration statement, update table of disclosures of material information.	Investigation
6/21/2021 WK	1.3	250.00	325.00	Read update from M. Ulrich on offers for Shepard home; read offers, send suggestions on strategy to get highest and best offers (1.1); emails with Shepard and Ulrich on process to maximize offers, notes of call (.2).	Asset Disposition
6/21/2021 WK	0.4	250.00	100.00	Call with G. Shepard on settlement; email DOJ on settlement;	Asset Recovery
6/21/2021 WK	2.0	250.00	500.00	Call with R. Hoffman, D. Castleberry on Rasmussen expert report, what questions to ask; discuss Reay request for expert report; send copy to D. Castleberry of court ruling denying Rasmussen expert testimony in 2015 (.7); call with Parr Brown re: Heideman request for Receiver communications with DOJ as part of Heineman's defense of Jameson; send information to Parr Brown and Manning Curtis (.5); read D. Castleberry proposed response to Heideman and Reay on access to DOJ communications (.6); call with D. Castleberry on review of litigation by DOJ in CRO, order approving litigation (.2)	Litigation
6/22/2021 WK	0.1	250.00	25.00	Read Heideman email re: his plan to file motion to compel production of DOJ communications; check whether Glenda filed evidence of sources of funds for property acquisitions (.1); read order granting attorney fees re: Anstram; emails with Parr Brown on collection of fees (.8)	Litigation
6/22/2021 WK	0.3	0.00	0.00	Read order in other case denying Rasmussen as expert; analyze factors. (Time not billed.)	Litigation
6/23/2021 WK	0.4	250.00	100.00	Pay Oasis power bill; review new offer for Shepard home, respond to broker with instructions; emails with M. Ulrich on offers for home, dual agent role.	Asset Disposition
6/28/2021 WK	2.7	250.00	675.00	Read emails from M. Lehr on disclosure of Jameson experts; read expert disclosure report; respond with comments on Adkisson & Boley reports, send Lone Peak and Sage reports (.7); read draft Lone Peak Valuation report for Reay; create redline, send to Lone Peak with comments (.5); read draft discovery motion to serve on Reay, send comments to D. Castleberry (.2); call with J. Balls on expert report for Plaskolite (on Cobblestone), set Plaskolite mediation date (.1); read Plaskolite deposition of receiver, note corrections (1.2).	Litigation

6/29/2021 WK	0.3	250.00	75.00	Respond to broker on highest offer for Shepard home and how to respond.	Asset Disposition
6/29/2021 WK	1.1	250.00	275.00	Read email from S. Paul on collecting contempt fee from Hamblin, review files, respond to J. Balls (.2); revise motion to approve settlements, send redline to J. Balls (.2); respond to J. Balls on briefing for Tenth Circuit on T. Shepard; review draft supplemental briefing on fee application (.7).	Asset Recovery
6/29/2021 WK	0.4	250.00	100.00	Finish reading transcript of Plaskolite deposition of Receiver, send errata sheet.	Litigation
6/30/2021 WK	0.1	250.00	25.00	Review, sign purchase agreement for Shepard home, with counteroffer.	Asset Disposition
6/30/2021 WK	0.8	250.00	200.00	Read email from M. Lehr on supplemental disclosures to Ina Newman, respond; review motion for turnover of four properties, create redline, send with comments (.3); read proposed order for property turnover, create redline, send to M. Lehr (.3); review emails from Taylor and Snow rejecting admissions sought by Receiver as a condition of settlement, send directions to M. Lehr (.2)	Asset Recovery
6/30/2021 WK	2.2	250.00	550.00	Read Reay opposition to Receiver motion to compel; read Glenda discovery response narrative, send comments to Parr Brown (.5); call with DOJ (1.0); email G. Shepard on settlement terms (.7).	Litigation
Totals		208.8	49,111.00		

EXHIBIT B-2



July 15, 2021

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

Invoice: 898781
Client: 176390
Matter: 1

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Administration of Receivership Estate

Professional Services	\$ 5,184.00
Total Costs Advanced	<u>\$ 1,546.12</u>
TOTAL THIS INVOICE	\$ 6,730.12



Invoice: 898781
 RaPower-3 Receivership
 Administration of Receivership Estate

July 15, 2021
 Client: 176390
 Matter: 1

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/06/21	MSL	Communication with Kara Houck re Zions Bank and potential assets of Neldon Johnson	.40	88.00
4/07/21	JRP	Conduct survey re validity of issued patents; Correspond with Chad Pehrson re the same	3.90	936.00
4/08/21	CSP	Emails re patent issues	1.20	402.00
4/08/21	JRP	Draft client memo re patents; Determine patent maintenance fee due dates; Draft Statutory Disclaimer template	4.70	1,128.00
4/09/21	JRP	Proofread client memo; Correspond with Jeffrey Balls and Chad Pehrson re the same	.60	144.00
4/15/21	MSL	Review order re contempt of Glenda Johnson, Hamblin, and Olsen; Communication with Wayne Klein re same	.50	110.00
4/19/21	MSL	Communication with counsel for R. Hamblin re contempt order and payment; Communication with P. Olsen re same	.40	88.00
4/20/21	MSL	Communication with Preston Olsen re payment of contempt fees	.20	44.00
5/03/21	MSL	Review and revise quarterly report; Review documents related to the motions for summary judgment in related cases for same; Communication with Wayne Klein re same	1.30	286.00
5/04/21	MSL	Review Zions Bank's public filings for information re branch in foreign locations; Research re issuing subpoena for foreign bank records; Draft communication with Wayne Klein re same; Review and revise client memorandum re divesting rights in patents; Communication with Jeff Balls and Wayne Klein re same; Incorporate changes to quarterly report by Wayne Klein; Finalize quarterly report; Coordinate filing re same	2.10	462.00
5/04/21	MSL	Review and revise client memorandum re divesting rights in patents; Communication with Jeff Balls and Wayne Klein re same	.50	110.00
5/27/21	MSL	Draft attorneys' fees motion re contempt motion, compile fee entries; Draft declaration of Michael Lehr; Draft declaration of Wayne Klein	4.80	1,056.00
5/28/21	MSL	Finalize motion for fees and costs related to Amstarm Energy; Coordinate filing re same	.50	110.00
6/22/21	MSL	Communication with Wayne Klein re order granting motion for attorneys fees; Review order re same	.20	44.00
6/29/21	MSL	Review supplemental filing re fee application re contempt motion; Communication with Jeff Balls re same	.40	88.00
6/30/21	MSL	Draft proposed order re tenth settlement motion; Coordinate filing re same	.40	88.00

TOTAL PROFESSIONAL SERVICES

\$ 5,184.00

Invoice: 898781
 RaPower-3 Receivership
 Administration of Receivership Estate

July 15, 2021
 Client: 176390
 Matter: 1

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Chad S Pehrson	335.00	1.20	402.00
Michael S. Lehr	220.00	11.70	2,574.00
Jason R Perry	240.00	9.20	2,208.00
TOTALS		22.10	\$ 5,184.00

COSTS ADVANCED

Date	Description	Amount
4/23/21	SimpleCertified Mail	5.47
6/24/21	Advanced Reporting Solutions - Rick Hoffman deposition transcript	193.60
6/28/21	Advanced Reporting Solutions - R. Wayne Klein deposition transcript	435.70
6/28/21	Advanced Reporting Solutions - Plaskolite, LLC 30(b)(6) deposition transcript	911.35

TOTAL COSTS ADVANCED \$ 1,546.12

TOTAL THIS INVOICE \$ 6,730.12



July 15, 2021

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

Invoice: 898782
Client: 176390
Matter: 3

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Appeal

Professional Services	\$ 3,960.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 3,960.00



Invoice: 898782
 RaPower-3 Receivership
 Appeal

July 15, 2021
 Client: 176390
 Matter: 3

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
6/08/21	JAB	Draft notice of appearance for Jean Armand appeal; Draft notice of appearance for Roger Hamblin appeal; Review status and due dates for appeals; Review amended notice of appeal for Digital Wave Energy	.70	203.00
6/09/21	JAB	Review order from 10th circuit re Hamblin appeal	.10	29.00
6/10/21	JAB	Review notices of appeal for Amber Bennett, Carey Hadderton, and John Howell; Email Wayne Klein re same	.20	58.00
6/11/21	JAB	Review notice of deficiency for Jean Armand; Email Wayne Klein re same	.10	29.00
6/14/21	JAB	Review appeal of Trudy Shepherd;	1.30	377.00
6/14/21	MSL	Review appellate brief submitted by Shepard; Communication with Jeff Balls re same	.30	66.00
6/15/21	JAB	Review notices for Trudy Shepherd appeal; Email Wayne Klein re same; Review correspondence from Wayne Klein re Shepherd appeal; Review appellate brief of Trudy Shepherd	2.60	754.00
6/15/21	MSL	Communication with Jeff Balls re Shepard appeal and exhibits; Review exhibits to Shepard brief	.30	66.00
6/17/21	JAB	Telephone conference with David Aemmer; Email Wayne Klein re same	1.00	290.00
6/21/21	JAB	Draft brief of appellee	2.80	812.00
6/23/21	JAB	Review research memorandum; Review docketing statement for Roger Hamblin	.90	261.00
6/24/21	JAB	Draft appellee brief for Trudy Shepherd; Research case law	2.00	580.00
6/28/21	JAB	Review docketing statements and notice no transcript is required for Hadderton, Bennett, and Howell	.30	87.00
6/29/21	JAB	Review 10th circuit filings; Draft notice of appearance for Howell, Bennett, and Hadderton matters; Draft contact information form and email same to 10th Circuit mediation office for Janet Roe, Paul Jones, Jean Armand, and Amber Bennett; Email Wayne Klein re Trudy Shepherd appellate brief	1.20	348.00

TOTAL PROFESSIONAL SERVICES

\$ 3,960.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jeffery A Balls	290.00	13.20	3,828.00
Michael S. Lehr	220.00	.60	132.00
TOTALS		13.80	\$ 3,960.00

TOTAL THIS INVOICE

\$ 3,960.00



July 15, 2021

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

Invoice: 898783
Client: 176390
Matter: 4

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Litigation

Professional Services	\$ 43,348.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 43,348.00



Invoice: 898783
 RaPower-3 Receivership
 Litigation

July 15, 2021
 Client: 176390
 Matter: 4

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
4/01/21	JAB	Telephone conference with Phil Downey, Monica Call, and Tiffany Strelow; Conference with Mike Lehr re Plaskolite;	1.50	435.00
4/01/21	MSL	Communication with Jeff Balls re claims against Plaskolite	.20	44.00
4/01/21	SD	Research at Utah Water Rights Division to identify, coordinate and summarize new uploaded information for water users into working files	.10	15.00
4/02/21	MSL	Communication with Jameson's counsel re settlement	.20	44.00
4/05/21	JAB	Draft reply memorandum in support of motion for summary judgment against Nick Kontos	1.00	290.00
4/06/21	JAB	Email Steven Paul re Frank Lunn settlement; Conference with Mike Lehr re scheduling	.90	261.00
4/07/21	JAB	Correspond with Chad Pehrson re patents;	.30	87.00
4/07/21	SD	Research at Utah Water Rights Division to identify, coordinate and summarize new uploaded information for water users into working files for Water Right - 68-2388	.20	30.00
4/08/21	JAB	Review correspondence from Kahuna Builders; Email Wayne Klein re same; Review tax court order; Correspond with Steven Paul re Jean Armand; Correspond with Steven Paul re Kahuna Builders; Review quarterly status report; Revise notice of Abraham property sale	2.70	783.00
4/09/21	JAB	Review correspondence re Plaskolite; Review response from Jeron Johnson to complaint	1.00	290.00
4/12/21	JAB	Telephone conference with Steven Paul; Draft motion to extend deadline for Chris Taylor; Telephone conference with Monica Call; Email Wayne Klein re Frank Lunn settlement	1.50	435.00
4/13/21	JAB	Review settlement agreement for Frank Lunn; Email Steven Paul re same; Telephone conference with Steve Bowers; Telephone conference with Wayne Klein re Steve Bowers; Draft stipulated judgment for Kahuna Builders	2.20	638.00
4/14/21	JAB	Email Steven Paul re Lunn settlement agreement; Draft discovery requests to Legrand Johnson, Glenda Johnson,	4.10	1,189.00
4/14/21	MSL	Draft lengthy correspondence to Wayne Klein re securities violations by Nelson Snuffer; Review pleadings in Nelson Snuffer litigation re securities violations; Communication with counsel for Nelson Snuffer re document production' Communication with Jasmine Leonardi re document production	1.80	396.00
4/15/21	JAB	Draft discovery responses to Randale Johnson, LaGrand Johnson, Matt Shepherd; Telephone conference with Erin Healy-Gallagher	3.70	1,073.00
4/15/21	MSL	Review Nelson Snuffer responses to Receiver's discovery requests; Communication with Wayne Klein re same	.40	88.00
4/15/21	JL	Review documents produced by Nelson Snuffer Dahle & Poulsen in response to First Set of Discovery Requests	.20	30.00

Invoice: 898783
 RaPower-3 Receivership
 Litigation

July 15, 2021
 Client: 176390
 Matter: 4

Date	Tkpr	Description	Hours	Amount
4/19/21	JAB	Review orders granting summary judgment; Email Wayne Klein re same; Email Robb Jones re settlement; Draft reply memorandum in support of motion for summary judgment for Jean Armand; Email Wayne Klein re Frank Lunn settlement	3.50	1,015.00
4/20/21	JAB	Review changes to Kahuna Builders order; Email Steven Paul re same; Draft stipulated dismissal for Chase; Telephone conference with Steven Paul; Draft notice of settlement; Email Mark Shepard	.80	232.00
4/21/21	JAB	Email Wayne Klein re Mark Shepard; Email Mark Shepard; Review Plaskolite documents; Correspond with Wayne Klein re Plaskolite	1.60	464.00
4/22/21	JAB	Draft request to submit for motion to approve public sale of DO-4568-1	.70	203.00
4/23/21	JAB	Conference with Mike Lehr; Review correspondence re Greg Shepard; Email Mark Shepard; File stipulated dismissal for JP Morgan Chase	.60	174.00
4/23/21	MSL	Telephone communication with J. Freeborn; Revise letter to Freeborn re Estate of Roger Freeborn; Coordinate sending letter	.60	132.00
4/26/21	JAB	Email Mark Shepard	.20	58.00
4/27/21	JAB	Conference with Wayne Klein; Zoom conference with Matt Shepard;	2.20	638.00
4/27/21	MSL	Communication with counsel for Ina Newman re extending trial deadlines pending summary judgment ruling	.20	44.00
4/27/21	MSL	Communication with Steve Chaston re settlement payment	.30	66.00
4/28/21	JAB	Conference with Mike Lehr; Email Mark Shepard; Review order denying motion for summary judgment against Ina Newman	.40	116.00
4/28/21	MSL	Draft stipulated motion to extend trial deadlines in Ina Newman case; Communication with Wayne Klein re same; Coordinate filing re motion; Review order re summary judgment in Newman case; Communication with Wayne Klein and Jeff Balls re same	1.60	352.00
5/03/21	JAB	Email Paul Jones re Lynette Williams; Review Lynette Williams payments; Conference with Mike Lehr re Freeborn claim; Review correspondence from Steven Paul re Thomas Day settlement offer	2.40	696.00
5/03/21	MSL	Review Jacqueline Freeborn's response to questions re estate of Roger Freeborn; Communication with Wayne Klein re same	.40	88.00
5/04/21	JAB	Review information re Plaskolite; Telephone conference with Kirk Newman; Conference with Mike Lehr re Kirk Newman and schedule; Email Steven Paul re Kirk Newman; Email Wayne Klein re Kirk Newman; Review settlement for Thomas Day; Email Steven Paul re same	1.20	348.00
5/04/21	MSL	Review communication from counsel for Nelson Snuffer re search terms; Communication with Wayne Klein re same	.40	88.00
5/05/21	JAB	Correspond with Wayne Klein re Kirk Newman; Telephone conference with Kirk Newman; Email Monica Call re Plaskolite; Review patent document; Review Kirk Newman documents	2.60	754.00
5/05/21	MSL	Review revised search term list for Nelson Snuffer documents; Communication with Wayne Klein re same	.30	66.00
5/05/21	MSL	Communication with Wayne Klein re research re Freeborn estate	.20	44.00

Invoice: 898783
 RaPower-3 Receivership
 Litigation

July 15, 2021
 Client: 176390
 Matter: 4

Date	Tkpr	Description	Hours	Amount
5/05/21	MSL	Communication with Jeff Balls re claims in the Snow and Taylor case including recoverability of wages	.30	66.00
5/06/21	JAB	Conference with Mike Lehr; Email Steven Paul; Email Robb Kinsey; Email Mark Shepard	1.40	406.00
5/07/21	JAB	Correspond with Mark Shepard; Draft motion to extend deadline for Stacy Snow; Email Steven Paul re same	1.50	435.00
5/07/21	MSL	Communication with counsel for Nelson Snuffer re search terms for documents	.50	110.00
5/10/21	JAB	Conference with Mike Lehr; Email Wayne Klein re appeal; Email Steve Paul re Snow and Taylor matters; Email Wayne Klein re appeal; Email Wayne Klein re Day settlement; Email Steven Paul re Day settlement	1.00	290.00
5/11/21	JAB	Draft notice of appearance for 10th Circuit for Trudy Shepherd appeal; Review hardship affidavit for Ed Kinsey; Email same to Wayne Klein; Review notice of appearance from Trudy Shepherd; Review motion to withdraw as counsel for Glenda Johnson; Email Steven Paul re extension; Email Robb Jones re Kinsey settlement	1.50	435.00
5/12/21	JAB	Email Robb Jones re settlement; Email Wayne Klein re Plaskolite deposition; Email Wayne Klein re Snow and Taylor meeting; Email Monica Call re Plaskolite discovery; Review correspondence re Frank Lunn settlement	2.20	638.00
5/13/21	JAB	Draft motions to amend scheduling order for Lagrand Johnson, Randale Johnson, Glenda Johnson, and Matthew Shepard; Review notice of appeals for Janet Roe and Paul Jones	1.40	406.00
5/14/21	JAB	Draft dismissals for Robert Aulds, Bell Energy, Steven Chaston, Kelvin Smith, and Lynette Williams; Email Lynette Williams and Steven Paul re same; Email Robb Jones re settlement; Telephone conference with Robb Jones; Telephone conference with Monica Call; Telephone conference with Jeron Johnson; Draft attorney planning meeting report and proposed scheduling order for Jeron Johnson; Draft and final motion to amend scheduling order for Kinsey	3.80	1,102.00
5/17/21	JAB	Review settlement offer from Thomas Day; Email Wayne Klein re same; Email Steven Paul re motions to extend deadlines and stipulated motions to dismiss; Email Glenda Johnson re motion to extend deadlines; Finalize and file motions to amend scheduling orders for Randale, LaGrand, and Glenda Johnson and Matt Shepard; Draft initial disclosures for Jeron Johnson; Review motion to amend scheduling order; Email Monica Call re same; Email Wayne Klein re Plaskolite depositions	2.20	638.00
5/18/21	JAB	Review documents re Plaskolite amended scheduling order; Travel to Sandy; Attend conference with Wayne Klein, Steven Paul, Chris Taylor, and Curtis Snow; Finalize motion to amend scheduling orders	4.50	1,305.00
5/19/21	JAB	Finalize notice of appearance in 10th circuit for Janet Roe and Paul Jones; Email Mark Shepard re status; Review correspondence from Wayne Klein to Steven Paul re Snow and Taylor	.70	203.00

Invoice: 898783
 RaPower-3 Receivership
 Litigation

July 15, 2021
 Client: 176390
 Matter: 4

Date	Tkpr	Description	Hours	Amount
5/20/21	JAB	Review email from Mark Shepard re settlement; Email Wayne Klein re same; Review and revise litigation status report; Review settlement agreement for Mark Shepard	2.00	580.00
5/21/21	JAB	Revise Mark Shepard settlement agreement; Email Mark Shepard re settlement; Email Glenda Johnson re extension; Arrange for filing of status report	1.50	435.00
5/24/21	JAB	Email Christian Gomez re deposition; Email Monica Call re depositions; Review order accepting litigation status report; Review settlement offer from James Woodson; Email Wayne Klein re same	.70	203.00
5/25/21	JAB	Prepare for hearing for Jeron Johnson; Attend court hearing for Jeron Johnson litigation; Review minute entry re same; Email Jeron Johnson; Email Steven Paul re James Woodson settlement; Email Wayne Klein re Thomas Day settlement; Email Steven Paul re same; Review correspondence re Plaskolite deposition	2.50	725.00
5/25/21	MSL	Communication with Wayne Klein re claims in Ina Newman litigation and settlement probability	.60	132.00
5/26/21	JAB	Telephone conference with Kirk Newman; Conference with Mike Lehr re Ina Newman matter; Correspond with Wayne Klein and Lone Peak re depositions; Email Monica Call re depositions	1.80	522.00
5/26/21	MJ	Receive background on case	.90	126.00
5/27/21	JAB	Telephone conference with Kirk Newman; Email Wayne Klein re same; Review appellate documents filed for Janet Roe and Paul Jones; Review email from Mark Shepard re settlement; Email Wayne Klein re same	2.20	638.00
5/28/21	JAB	Correspond with Monica Call re depositions; Call Kirk Newman; Email Kirk Newman	.60	174.00
5/28/21	MSL	Draft email to counsel for Nelson Snuffer re document production	.10	22.00
5/28/21	MJ	Review appeal documents from opposing counsel	1.10	154.00
5/28/21	MJ	Review district court trial documents	1.90	266.00
5/31/21	JL	Review Nelson Snuffer Dahle & Poulsen's responses to R. Wayne Klein's first set of discovery requests	.30	45.00
6/01/21	JAB	Telephone conference with Kirk Newman re settlement; Email Wayne Klein re same; Correspond with Robb Jones re Kinsey settlement; Review and revise Kirk Newman settlement agreement; Email Wayne Klein re depositions; Correspond with Monica Call re depositions for Plaskolite; Telephone conference with Steve Paul re Snow and Taylor; Conference with Mike Lehr re Nelson Snuffer extension	2.80	812.00
6/02/21	JAB	Review email from Wayne Klein re equity considerations; Review correspondence and settlement agreement from Kirk Newman; Email Wayne Klein re same; Email Wayne Klein re motion for fees	.70	203.00
6/02/21	MSL	Communication with Wayne Klein re Nelson Snuffer document production issues and extension of fact discovery	.60	132.00

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Date	Tkpr	Description	Hours	Amount
6/03/21	JAB	Call Steven Bowers re default under settlement; Telephone conference with Shane Luke re default under settlement; Draft notice of settlement for Thomas Day; Draft discovery requests to Steven King; Draft discovery requests to Raleigh Stewart; Review email from Robb Jones re Ed Kinsey; Telephone conference with Robb Jones re Kinsey settlement; Email Wayne Klein re same	2.70	783.00
6/03/21	MJ	Read S.E.C. v. Elliott for points of interest	.90	126.00
6/04/21	JAB	Draft discovery requests to Andrew Zeigler; Review orders of dismissal; Conference with Mike Lehr re Nelson Snuffer documents; Telephone conference with Steven Paul re Frank Lunn, Taylor, and Snow; Email Wayne Klein re same; Email Wayne Klein re Woodson settlement; Email Rick Hoffman re deposition	2.30	667.00
6/04/21	MSL	Draft lengthy communication with counsel for Nelson Snuffer re document production, deposition plans, and extending fact discovery; Review previous communications re same	.60	132.00
6/04/21	MSL	Communication with counsel for Ina Newman re trial schedule	.30	66.00
6/04/21	MJ	Research relevant cases discussing the circuit courts defaulting to district court discretion	1.80	252.00
6/04/21	MJ	Research footnotes and supplemental cases to the due process argument in Elliott	2.30	322.00
6/07/21	JAB	Conference with Rick Hoffman; Telephone conference with Monica Call	3.30	957.00
6/07/21	MJ	Finish preliminary research (2.0), and send Jeff Balls a summary email (0.1)	2.10	294.00
6/08/21	JAB	Prepare deposition outline for Plaskolite; Email Monica Call re Plaskolite documents; Email Rick Hoffman re deposition topics; Prepare deposition outline for Randale Johnson	5.40	1,566.00
6/09/21	JAB	Draft deposition outline for Plaskolite; Attend deposition of Rick Hoffman; Review correspondence from Steven Paul re Jean Armand; Email Wayne Klein re same; Draft deposition outline for Randy Johnson; Review correspondence from Monica Call; Telephone conference with Monica Call; Draft request to submit for Kontos summary judgment motion; Conference with Matt Johnson re accounting and judicial notice; Review Plaskolite privilege log; Email Kirk Newman re receipt of documents	8.40	2,436.00
6/09/21	MJ	Review due diligence findings with Jeffery Balls	.40	56.00
6/10/21	JAB	Prepare for deposition of Wayne Klein; Review exhibits from Plaskolite; Review documents for Plaskolite deposition; Attend deposition of Wayne Klein; Review documents from Plaskolite	5.00	1,450.00
6/11/21	JAB	Prepare for Plaskolite deposition; Take Plaskolite deposition; Conference with Wayne Klein re Plaskolite; Conference with Mike Lehr re Plaskolite deposition; Review correspondence from Andrew Zeigler re settlement; Email Wayne Klein re same	6.60	1,914.00
6/11/21	MSL	Review newly discovered documents related to Zions Loan and claims related to Ina Newman; Communication with Jeff Balls re same	1.00	220.00

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Date	Tkpr	Description	Hours	Amount
6/14/21	JAB	Review correspondence from Robb Jones; Email Wayne Klein re same; Review correspondence from Wayne Klein re Zeigler settlement; Email Andy Zeigler re same; Review Zeigler settlement agreement	.50	145.00
6/15/21	JAB	Email Robb Jones re settlement; Email Wayne Klein re settlement; Conference with Mike Lehr re Ina Newman trial; Review and revise stipulated motion to amend trial date for Ina Newman; Telephone conference with Steven Paul re discovery and Snow and Taylor settlements; Review motion to approve settlements	1.00	290.00
6/15/21	MSL	Draft motion to amend trial dates in Newman action; Communication with Jeff Balls re same; Communication with counsel for Newman re same; Coordinate filing re same	1.60	352.00
6/16/21	MSL	Communication with counsel for Nelson Snuffer re discovery deadlines and production; Communication with Jeff Balls re document production	.40	88.00
6/16/21	MJ	Research judicial notice (1.0); Research judicial notice court cases (1.9); Draft judicial notice summary (0.3)	3.20	448.00
6/17/21	MJ	Research heresay (0.7); Research case law for heresay (1.3)	2.00	280.00
6/18/21	JAB	Telephone conference with Monica Call	.20	58.00
6/18/21	MSL	Communication with Jeff Balls re requested meet and confer in Jameson case	.20	44.00
6/21/21	JAB	Meet and confer with Don Reay re Jameson discovery; Review correspondence from Wayne Klein re meet and confer	.80	232.00
6/21/21	MSL	Conference with counsel for Jameson re Receiver's communications with the Department of Justice; Communication with Wayne Klein re same; Review documents re communications with Department of Justice	1.20	264.00
6/21/21	MJ	Research Federal Rules of Evidence (0.9); Research additional hearsay cases (0.9); Draft research summary of judicial notice and general arguments (1.0)	2.80	392.00
6/22/21	JAB	Review correspondence; Review court orders on motion for summary judgment	.50	145.00
6/22/21	MSL	Draft stipulated motion to amend scheduling order and proposed order; Communication with counsel for Nelson Snuffer re same	.90	198.00
6/22/21	MSL	Review discovery responses from Glenda Johnson; Communication re Glenda Johnson's failure to submit evidence related to four properties held in her name and next steps	.30	66.00
6/22/21	MJ	Research additional analysis on hearsay under the Federal Rules of Evidence (0.5); Research case history on hearsay cases (0.5); Draft summary of hearsay findings (0.5); Review and organize research summary (0.2); Review research summary citations (0.2); Draft email to Jeff Balls (0.1)	2.00	280.00
6/23/21	JAB	Draft order for Nick Kontos; Review expert disclosures for Richard Jameson; Conference with Mike Lehr re expert deadlines	4.40	1,276.00

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Date	Tkpr	Description	Hours	Amount
6/23/21	MSL	Draft lengthy communication to counsel for Jameson re meet and confer re Receiver's communication with the Department of Justice; Legal research re common interest privilege and work product privilege; Review discovery requests in Jameson case; Legal research re rebuttal expert testimony; Communication with Jeff Balls re same	1.90	418.00
6/23/21	MSL	Communication with counsel for Nelson Snuffer re scheduling order	.10	22.00
6/24/21	JAB	Finalize order for Nicholas Kontos; Email Steven Paul re same; Draft case status update; Email Robb Jones re same; Review judgment against Dallas Plater; Call Steven Paul re Snow and Taylor; Email Wayne Klein re mediation	1.80	522.00
6/25/21	JAB	Email Monica Call re mediation	.20	58.00
6/25/21	MSL	Conference with counsel for Nelson Snuffer re scheduling order; Review comments and redline to amended scheduling order	.40	88.00
6/28/21	JAB	Telephone conference with Monica Call; Telephone conference with Wayne Klein re Plaskolite experts; Review and revise scheduling order; Email Monica Call re Plaskolite scheduling order; Correspond with Steven Paul re contempt order and payment of fees from Roger Hamblin; Telephone conference with Steven Paul re Snow and Taylor and depositions for Matt Shepard, Randy Johnson, and LaGrand Johnson	2.30	667.00
6/28/21	MSL	Incorporate changes to amended scheduling order; Revise amended scheduling order; Communication with consul for Nelson Snuffer re scheduling order	.40	88.00
6/28/21	MSL	Communication with Jeff Balls re claims against Plakolite and potential use of experts	.30	66.00
6/29/21	JAB	Review order re statement on fees; Conference with Mike Lehr re same; Draft supplemental memorandum re attorney fees; Email Wayne Klein re same; Email Robb Jones re Kinsey settlement	2.20	638.00
6/29/21	MSL	Review and revise stipulated motion to amend scheduling order; Communication with counsel for Nelson Snuffer re same	.30	66.00
6/29/21	MSL	Review communication and documents related to experts disclosed in the Jameson matter; Communication with Wayne Klein re same	.60	132.00
6/29/21	MSL	Review and analyze documents related to Ina Newman litigation; Review pleading and discovery in Newman case related to documents; Review claims asserted against Newman; Draft communication and analysis with Wayne Klein re same	2.30	506.00
6/30/21	JAB	Review motion for turnover of Glenda Johnson properties; Review and revise motion to approve settlements; Email Kirk Newman re status of case;	.70	203.00
6/30/21	MSL	Revise amended scheduling order in Nelson Snuffer case; Coordinate filing re same	.30	66.00
6/30/21	MSL	Review revised settlement document in Snow and Taylor case; Communication with Wayne Klein re same	.20	44.00

PARR BROWN GEE & LOVELESS

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Date	Tkpr	Description	Hours	Amount
6/30/21	MSL	Review pleadings in litigation against Glenda Johnson; Review order re Glenda Johnson's contempt; Draft motion for turnover of four parcels of real property; Draft proposed order re same; Revise motion and proposed order; Communication with Wayne Klein and Jeff Ball re same; Coordinate filing re same	4.80	1,056.00

TOTAL PROFESSIONAL SERVICES \$ 43,348.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jeffery A Balls	290.00	118.40	34,336.00
Michael S. Lehr	220.00	26.80	5,896.00
Matthew Johnson	140.00	21.40	2,996.00
Sheryl Dirksen - Paralegal	150.00	.30	45.00
Jasmine Leonardi - Paralegal	150.00	.50	75.00
TOTALS		167.40	\$ 43,348.00

TOTAL THIS INVOICE \$ 43,348.00

EXHIBIT B-3



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

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Statement Date: 04/30/2021
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Donald Reay, Reay Law, PLLP

Fees

		Hours	
04/05/2021	DCC	Read e-mail from receiver re discovery letter; finalize and send same.	0.70 245.00
	DCC	Read order from court extending times for discovery; read follow up e-mail re same.	0.30 105.00
04/21/2021	DCC	Read errata submitted.	0.20 70.00
04/22/2021	DCC	Read and analyze letter from Reay; read and analyze privilege log; read and analyze file re issues raised; telephone conference with MMLongson re issues to address; draft e-mail to receiver and MMLongson re follow up in case and background re issues raised.	1.80 630.00
04/23/2021	CAJ	Identify and tag files clawed back by Reay for MMLongson review.	0.60 93.00
	DCC	Read review of timeline re conversations with opposing counsel re discovery disputes; Read e-mail from receiver re document production issues; Analyze issues in matter; telephone conference with receiver re same; draft e-mail to	

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		Hours	
	receiver re errata sheet from deposition; draft e-mail to Don Reay.	1.80	630.00
04/26/2021			
DCC	Conference with MMLongson re privilege issues and provide assignments re follow up re same; follow up e-mail exchange with MMLongson re same; conference with MMLongson re privilege issues; follow up e-mail exchanges with MMLongson re research.	0.70	245.00
CAJ	Identify and tag files clawed back by Reay for MMLongson review; confer with MMLongson re difficulty of same due to format of production by Reay.	1.30	201.50
MML	Review/analyze documents for which clawback has been requested; review/analyze Joint Defense Agreement and analyze issues re same as applied to communications between Reay and counsel for Receivership Entities; review/analyze deposition exhibits and summarize for DCCastleberry those documents for which clawback should be objected to.	3.00	660.00
04/27/2021			
MML	Research re Rule 56 objections to evidence previously withheld as privileged; analyze issues re same with DCCastleberry.	1.90	418.00
DCC	Read e-mail from MMLongson re research re admissibility issues and timing for raising same; telephone conference with Don Reay re case; telephone conference with receiver re case; telephone conference with MMLongson re case and provide instructions re tasks re same.	1.40	490.00
04/28/2021			
MML	Draft/revise letter response to Reay re privileged document clawback; review pleading and production history for information to include in same.	3.50	770.00
04/29/2021			
MML	Draft and finalize letter response to Reay re document clawback request.	1.60	352.00

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RaPower-3, LLC Receivership

Hours

DCC Read e-mail from MMLongson re response letter re discovery issues; edit and revise letter; draft e-mail to receiver re same. 0.80 280.00

04/30/2021

MML Review edits to Reay letter from Receiver; proof letter for service. 0.30 66.00

DCC Read e-mail from receiver re letter re discovery issues; follow up re same and edit and revise same; e-mail exchanges with MMLongson re discovery letter; finalize and send discovery letter to Reay; follow up e-mail with receiver re same. 0.70 245.00

For Current Services Rendered 20.60 5,500.50

Courtesy Discount -1,500.00

Net Fees after Courtesy Discount 4,000.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	8.40	\$350.00	\$2,940.00
Cortney A. Jones	1.90	155.00	294.50
Mitch M. Longson	10.30	220.00	2,266.00

Expenses

Photocopies 4.60

Computer Research Westlaw 68.88

Total Expenses 73.48

Total Current Work 4,073.98

Previous Balance \$9,701.06

Balance Due \$13,775.04

Taxpayer ID # 84-1395129



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Donald Reay, Reay Law, PLLP

Fees

		Hours		
05/03/2021	DCC	Read e-mail from Reay re request for counteroffer; draft e-mail to receiver re same with analysis; read e-mail from receiver re counteroffer; follow up email exchanges re same and review file and correspondence re same.	0.50	175.00
05/04/2021	MML	Review/analyze and annotate deposition of Reay for use in Motion for Summary Judgment.	2.40	528.00
	DCC	Draft e-mail re counteroffer in case.	0.20	70.00
05/05/2021	DCC	Draft e-mail to MMLongson re motion for summary judgment analysis and status of case.	0.20	70.00
05/06/2021	MML	Finish review and annotation of Reay deposition for use in Motion for Summary Judgment; analyze issues re clawback of documents and use of same by Reay on Summary Judgment.	1.20	264.00
	DCC	E-mail exchanges with opposing counsel re settlement; e-mail exchanges with receiver re same.	0.20	70.00

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		Hours	
05/07/2021	MML Analyze issues re admissibility of tax court opinions as evidence.	0.30	66.00
	DCC Read and respond to e-mail from receiver re offer of judgment and re clawback issues; draft e-mail to MMLongson re case; draft mail to opposing counsel re counteroffer.	0.60	210.00
05/11/2021	DCC Read e-mail from opposing counsel re counteroffer and follow up re same; draft email to receiver re same.	0.20	70.00
05/12/2021	DCC Read e-mail from receiver re counteroffer.	0.20	70.00
05/13/2021	DCC E-mail exchanges with MMLongson re settlement exchanges in case; review e-mail from MMLongson to opposing counsel.	0.30	105.00
05/19/2021	MML Phone call with opposing counsel re document clawback issues and settlement; confer with CAJones re same.	0.80	176.00
05/24/2021	DCC Draft e-mail to MMLongson re follow up needed in case; read e-mail from MMLongson re follow up re discovery issues; read e-mail from MMLongson to opposing counsel; read e-mail from opposing counsel; read follow up e-mail from MMLongson; draft e-mail to receiver re status in case.	0.60	210.00
	MML Correspond with opposing counsel re stipulation on document claw back and fact discovery deadline issues.	0.20	44.00
05/27/2021	DCC Review e-mail and documents from opposing counsel; review e-mails from MMLongson and CAJones re same; read follow up e-mail from MMLongson re same; analyze issues re claw back.	1.00	350.00
	CAJ Add documents not clawed back by Reay to database for review.	0.30	46.50

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Hours

MML Direct CAJones re downloading and spot checking re-produced documents from Reay, and deletion of existing document production. 0.20 44.00

05/28/2021

CAJ Spot check re-produced documents from Reay and report findings to DCCastleberry and MMLongson; analyze number of emails in PDF portfolio productions to ascertain best way to independently claw back the Reay files. 0.90 139.50

DCC Read emails from MMLongson and CAJones re follow up re documents; draft follow up email re same. 0.30 105.00

For Current Services Rendered 10.60 2,813.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	4.30	\$350.00	\$1,505.00
Cortney A. Jones	1.20	155.00	186.00
Mitch M. Longson	5.10	220.00	1,122.00

Total Current Work 2,813.00

Previous Balance \$13,775.04

Balance Due \$16,588.04

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

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Statement Date: 06/30/2021
Account No: 21868-00030
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Donald Reay, Reay Law, PLLP

Fees

		Hours	
06/01/2021			
CAJ	E-mails with NLRedd re process to claw back Reay production.	0.30	46.50
MML	Research re case law supporting motion to compel production of Reay's correspondence with RaPower.	1.70	374.00
NLR	Extract all documents from .pdf portfolio and troubleshoot same; extract all Bates from .pdf portfolio and troubleshoot same; manually remove clawed back documents from Bates extraction spreadsheet.	4.50	697.50
06/02/2021			
MML	Phone calls with opposing counsel re potential settlement counteroffer.	0.20	44.00
DCC	Telephone conference with MMLongson re follow up needed re privilege log.	0.20	N/C
06/03/2021			
NLR	Run comparison on additional e-mail files to determine if all were re-produced by opposing counsel; finish removing clawed back documents from document production sets; add finalized production set to iPro; tag production sets within iPro database; update index of file re same.	2.50	387.50

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		Hours		
	DCC	Read e-mail from NLRedd re documents not on clawback list but not re-produced; review e-mail from MMLongson re attempted follow up with Reay.	0.20	70.00
06/04/2021	MML	Correspond with Reay re document clawback issues.	0.20	44.00
	DCC	Read e-mail from MMLongson to opposing counsel; draft e-mail re follow up re same; draft e-mail to MMLongson re same.	0.20	70.00
06/07/2021	MML	Phone call with opposing counsel re clawback issues and settlement counteroffer; review correspondence and deposition exhibits to determine list of documents to be challenged on privilege designation.	1.00	220.00
	DCC	Telephone conference with MMLongson and with receiver re issues in case; review follow up e-mail from Don Reay, MMLongson and the receiver.	0.70	245.00
06/08/2021	MML	Analyze issues re settlement approach and privilege issues; draft/revise e-mail to Reay re documents for which we intend to challenge claw back.	1.50	330.00
	DCC	Read e-mail from MMLongson to opposing counsel re document dispute; conference with MMLongson re discussion with Don Reay; draft e-mail to receiver re same; review e-mail from receiver re same; review offer of judgment from Reay; review email re challenge to documents from Don Reay; review e-mail from MMLongson re proposed response and draft e-mail re same; review email from receiver re settlement and draft response re same; review follow up e-mail from receiver; review e-mail from MMLongson re follow up with Don Reay.	1.60	560.00
06/09/2021	DCC	Read e-mail and attachments from MMLongson re clawback issues.	0.20	70.00

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		Hours		
06/10/2021	NLR	Search for and remove clawed-back documents from Worldox; request additional instruction re deposition exhibits on claw back list; review Worldox database for additional REAY docs to remove; update index of file re changes made and documents removed.	1.20	186.00
	MML	Direct NLRedd re document clawback deletion issues.	0.20	44.00
06/11/2021	DCC	Read e-mail from MMLongson re follow up re settlement and discovery disputes; read follow up emails re same.	0.30	105.00
06/16/2021	MML	Phone call with Reay re document clawback issues and settlement.	0.30	66.00
06/18/2021	DCC	Research and analysis re outstanding issues related to expert and re claims at issue; read email from opposing counsel re same; draft e-mail to opposing counsel.	0.80	280.00
06/21/2021	MML	Review past correspondence re Reay request for documents; review DCCastleberry proposed meet and confer response to Reay.	0.20	44.00
	DCC	Telephone conference with expert re disclosure and report and review file re expert issues in case; draft letter responding to claim that defendants are entitled to privileged documents and prepare privilege log re same.	1.00	350.00
06/23/2021	MML	Analyze issues re Short Form Discovery Motion re clawback issues.	0.20	44.00
	DCC	E-mail exchanges with receiver re next steps and e-mail exchanges with expert re same; follow up re next steps in light of non-response by opposing counsel.	0.60	210.00
06/24/2021	MML	Draft Short Form Discovery Motion re document clawback		

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		Hours	
	issues; correspond with Reay and DCCastleberry re same; research re privilege in context of fee disputes.	2.60	572.00
DCC	Analyze discovery issues in case; provide instruction to MMLongson re same; read e-mail from MMLongson re same; read e-mail from receiver re expert discovery.	0.70	245.00
06/25/2021			
DCC	Read e-mail from MMLongson re draft motion to clawback documents; edit and revise motion; draft e-mail to MMLongson re same; review follow up email from MMLongson re same; work on issues re expert report and e-mail exchanges re same; e-mail exchanges re follow up with Reay expert report and re motion to compel; follow up e-mail with MMLongson and Receiver.	1.50	525.00
MML	Draft/revise Short Form Discovery Motion re privilege issue; e-mail DCCastleberry re research on privilege and billing disputes.	0.90	198.00
06/28/2021			
DCC	E-mail exchanges with Cristian Gomez re expert report; draft e-mail to receiver re Rule 37 motion; draft follow up e-mail to receiver; provide direction to MMLongson re motion to compel; telephone conference with Cristian Gomez re expert report; follow up re form of report; follow up email exchanges with Cristian Gomez; review e-mail from receiver re expert report; review updated Rule 37 motion from MMLongson; review e-mail and edited draft from receiver re Rule 37 motion; e-mail exchange with MMLongson re Rule 37 motion and order re motion, etc.; draft e-mail to MMLongson re same; review final report; review filed Rule 37 motion.	2.30	805.00
MML	Draft/revise Short Form Discovery Motion and Proposed Order; direct LLAnderson re exhibits and filing Motion.	1.60	352.00
06/29/2021			
DCC	Work on expert disclosures; edit and revise same; arrange for same to be served.	0.40	140.00
CAJ	Prepare FTP link to transfer Richard Hoffman expert report		

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RaPower-3, LLC Receivership

	Hours	
to opposing counsel.	0.30	46.50
DCC Read and analyze opposition to Rule 37 statement of discovery; read proposed order; e-mail exchange with MMLongson re same.	0.40	140.00
MML Review/analyze Short Form Discovery Response Brief.	0.20	44.00
For Current Services Rendered	30.50	7,555.00
Courtesy Discount		-2,000.00
Net Fees after Courtesy Discount		<u>5,555.00</u>

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	10.90	\$350.00	\$3,815.00
Natalie L. Redd	8.20	155.00	1,271.00
Cortney A. Jones	0.60	155.00	93.00
Mitch M. Longson	10.80	220.00	2,376.00

Expenses

Computer Research Westlaw	122.56
Total Expenses	<u>122.56</u>
Total Current Work	5,677.56
Previous Balance	\$16,588.04
Balance Due	<u>\$22,265.60</u>

Taxpayer ID # 84-1395129



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

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Account No: 21868-00020
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Heideman and Associates

Fees

		Hours	
04/01/2021	DCC Read e-mail from opposing counsel re expert issues.	0.20	70.00
04/05/2021	DCC Draft e-mail to receiver re expert issues in case; review e-mail from receiver re various expert issues; review e-mail from receiver re documents in case and review attachments re same; review follow up emails re expert issues; begin to outline respond to discovery issues raised and draft e-mail to receiver re same.	1.10	385.00
04/06/2021	DCC E-mail exchanges with opposing counsel re discovery issues; e-mail exchanges with receiver re documents in case.	0.60	210.00
	DCC Read e-mail from Rick Hoffman re expert issues.	0.20	70.00
04/07/2021	DCC Read emails from receiver and from expert; draft e-mail to receiver re same; follow up email with receiver re case; draft e-mail to opposing counsel re discovery issues.	0.80	280.00
	MML Review/analyze correspondence re expert extensions and related issues.	0.40	88.00

RaPower-3, LLC Receivership

Page No: 2
 Statement Date: 04/30/2021
 Account No: 21868-00020
 Statement No: 62466

		Hours	
04/08/2021	DCC	Read e-mail from receiver re ruling from United States Tax Court.	0.20 70.00
04/14/2021	DCC	Read and analyze motion for extension and note follow up re same; e-mail exchange with Cristian Gomez; draft e-mail to expert re deposition dates for experts; draft e-mail to receiver re same; review e-mail from receiver re motion; review email from expert.	0.60 210.00
04/15/2021	MML	Draft Opposition to Motion to Extend Expert Discovery and Associated Deadlines; research re case law on ordering of expert depositions and reports.	4.00 880.00
	DCC	Read email from MMLongson and draft opposition to motion to extend; e-mail exchange with MMLongson re standard under Rule 6; read order from court setting forth briefing schedule; read follow up e-mail from MMLongson re research on issues.	0.70 245.00
	DCC	E-mail exchange with Rick Hoffman re scheduling issues and timing.	0.20 70.00
04/16/2021	DCC	Edit and revise opposition to motion for extension; e-mail exchanges with receiver re same.	0.40 140.00
04/17/2021	DCC	E-mail exchanges with receiver and with MMLongson re opposition to motion for extension.	0.20 70.00
04/19/2021	MML	Proof, finalize, and file Opposition to Motion to Extend Expert Discovery and Associated Deadlines.	1.00 220.00
	DCC	Finalize and arrange for opposition to be filed re discovery issues.	0.40 140.00
04/23/2021	DCC	Read reply brief filed by Heideman in support of motion or	

RaPower-3, LLC Receivership

Page No: 3
 Statement Date: 04/30/2021
 Account No: 21868-00020
 Statement No: 62466

		Hours	
	extension.	0.20	70.00
04/26/2021			
	DCC Read order on request for extension; read follow up e-mail re new dockets in case; follow up e-mail re same and review e-mail from receiver re same; read e-mail from Rick Hoffman re same.	0.40	140.00
04/29/2021			
	MML Review/analyze and annotate Heideman deposition for use in Motion for Summary Judgment.	3.00	660.00
04/30/2021			
	MML Finish review and annotation of Heideman deposition for Motion for Summary Judgment; revise Motion for Summary Judgment to incorporate same; research re frivolous arguments and violations of Rules of Professional Conduct as a basis for bad faith finding in transfer avoidance actions.	2.30	506.00
	For Current Services Rendered	16.90	4,524.00
	Courtesy Discount		<u>-1,500.00</u>
	Net Fees after Courtesy Discount		<u>3,024.00</u>

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	6.20	\$350.00	\$2,170.00
Mitch M. Longson	10.70	220.00	2,354.00

Expenses

Computer Research Westlaw	175.54
Total Expenses	<u>175.54</u>

Advances

04/15/2021	Electronic Document Processing - PACER [Billed Quarterly] - Electronic Court Records	3.60
	Total Advances	<u>3.60</u>

Page No: 4
Statement Date: 04/30/2021
Account No: 21868-00020
Statement No: 62466

RaPower-3, LLC Receivership

Total Current Work	3,203.14
Previous Balance	\$24,758.80
Balance Due	<u>\$27,961.94</u>

Taxpayer ID # 84-1395129



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

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

Page No: 1
Statement Date: 05/31/2021
Account No: 21868-00020
Statement No: 62612

Heideman and Associates

Fees

		Hours	
05/03/2021	DCC Draft e-mail to MMLongson re decision in United States Tax Court decision.	0.20	70.00
	MML Review/analyze US Tax Court opinion on Olsen case; incorporate same into Motion for Summary Judgment.	1.80	396.00
	DCC Email exchange with MMLongson re evidence re motion for summary judgment and tax finding in matter.	0.40	140.00
05/04/2021	MML Draft/revise Motion for Summary Judgment sections on unjust enrichment and insolvency with evidence from Heideman deposition and Findings of Fact in underlying case.	1.10	242.00
05/07/2021	DCC Analyze tax court opinion; e-mail exchange with MMLongson re same.	0.50	175.00
05/10/2021	MML Draft MSJ Statement of Facts.	0.50	110.00
05/11/2021	MML Draft/revise Statement of Facts in Motion for Summary		

RaPower-3, LLC Receivership

Page No: 2
 Statement Date: 05/31/2021
 Account No: 21868-00020
 Statement No: 62612

		Hours	
	Judgment.	2.20	484.00
05/12/2021	MML Draft/revise MSJ Statement of Facts; research re bad faith defense in context of violation of Rules of Professional Conduct and frivolous legal arguments.	2.70	594.00
05/13/2021	DCC Read email from opposing counsel re expert discovery issues.	0.20	70.00
05/14/2021	MML Correspond with client and expert re document requests from opposing counsel.	0.20	44.00
	DCC Draft e-mail to MMLongson re follow up needed with expert and receiver; read e-mail from MMLongson to receiver; read e-mail from receiver re expert discovery issues; read e-mail from MMLongson re follow up in case.	0.40	140.00
05/17/2021	MML Review and annotate Deposition of Wayne Klein for potential use in MSJ; draft/revise MSJ based on same; fix citations and add exhibit references in same.	2.30	506.00
	DCC Read e-mail from receiver re expert issues; review e-mail from MMLongson re same; draft e-mail to MMLongson re same.	0.40	140.00
05/18/2021	MML E-mail opposing counsel re expert materials request.	0.20	44.00
	DCC Review emails from MMLongson re expert issues; e-mail exchanges with Rick Hoffman re expert depositions.	0.40	140.00
05/19/2021	DCC Read e-mail from receiver re expert schedule issues.	0.20	70.00
05/20/2021	MML Research re expert disclosure obligations for corrected data; summarize research in e-mail to DCCastleberry.	0.70	154.00

Page No: 3
 Statement Date: 05/31/2021
 Account No: 21868-00020
 Statement No: 62612

RaPower-3, LLC Receivership

		Hours	
MML	Research re supplemental expert disclosure obligations to correct erroneous schedule relied upon by expert; correspond with DCCastleberry re same.	0.50	110.00
DCC	E-mail exchanges with MMLongson re expert disclosure issues and review research re same.	0.20	70.00
05/24/2021			
DCC	Draft e-mail to MMLongson re expert supplementation follow up; read e-mail from MMLongson and draft of supplemental statement from MMLongson; draft e-mail to MMLongson re expert report; follow up with expert; read e-mail from opposing counsel re expert issues; telephone conference with Cristian Gomez.	0.80	280.00
MML	Research re Rule 26(e) supplementation procedures; analyze issues re same, including need to correct Schedule 4 in Expert Report; read/analyze correspondence from opposing counsel re expert work files and conflict issue.	1.10	242.00
05/25/2021			
DCC	Work on issues re expert issues; e-mail exchanges and follow up re questions raised by opposing counsel; review e-mail from opposing counsel; review e-mail from receiver; review e-mail from Cris Gomez; draft e-mail to Cris Gomez; draft e-mail to receiver re expert follow up issues.	1.40	490.00
05/26/2021			
DCC	Read documents from receiver; analyze issues re expert issues; follow up emails re same; review follow up emails from receiver and from Cristian Gomez re same.	0.70	245.00
05/27/2021			
DCC	Work on issues re expert follow up; work on issues re discovery follow up; draft e-mail to opposing counsel re disclosure and expert issues; e-mail exchanges with MMLongson and CAJones re same; e-mail exchange with Cristian Gomez; produce documents to opposing counsel and follow up re logging production in case.	1.20	420.00
CAJ	Add Heideman lens refund letters to database for production; review file for past productions and email DCCastleberry and		

RaPower-3, LLC Receivership

Page No: 4
 Statement Date: 05/31/2021
 Account No: 21868-00020
 Statement No: 62612

	Hours	
MMLongson re prior productions; update index of file to reflect all past productions to opposing counsel.	0.40	62.00
MML Analyze issues re logging past productions or inspection of documents; direct CAJones re same.	0.20	44.00
05/28/2021		
DCC Telephone conference with Cris Gomez re updates re expert report.	0.30	105.00
For Current Services Rendered	<u>21.20</u>	<u>5,587.00</u>

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	7.30	\$350.00	\$2,555.00
Cortney A. Jones	0.40	155.00	62.00
Mitch M. Longson	13.50	220.00	2,970.00

Expenses

Computer Research Westlaw	147.78
Total Expenses	<u>147.78</u>
Total Current Work	5,734.78
Previous Balance	\$27,961.94
Balance Due	<u><u>\$33,696.72</u></u>

Taxpayer ID # 84-1395129



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

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

Page No: 1
Statement Date: 06/30/2021
Account No: 21868-00020
Statement No: 62954

Heideman and Associates

Fees

		Hours	
06/01/2021	DCC	Read e-mail from Cris Gomez re updated report; draft e-mail to Cris Gomez re same and other related questions; work on updated report disclosure; e-mail exchange with receiver re updated report disclosure; draft email to opposing counsel re same.	1.20 420.00
	CAJ	Add Hoffman corrected expert report to FTP for transfer to opposing counsel.	0.20 31.00
06/02/2021	MML	Revise and finalize Motion for Summary Judgment; review correspondence re expert discovery extension.	1.10 242.00
	DCC	Read e-mail from Justin Elswick re quickbook files; draft e-mail re revised expert report; draft e-mail to expert; review e-mail from receiver; review Cristian Gomez; review e-mail and proposed stipulation and order and edit same; follow e-mail exchanges re same; review filing by opposing counsel; telephone conference with opposing counsel.	1.20 420.00
06/03/2021	DCC	Read e-mail from Rick Hoffman re quickbook issues; review order granting extension.	0.40 140.00

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 Statement Date: 06/30/2021
 Account No: 21868-00020
 Statement No: 62954

RaPower-3, LLC Receivership

		Hours		
06/04/2021	DCC	Read e-mail from Justin Elswick re rule 26 discovery issues and expert disclosures; legal research re same; draft e-mail to Mr. Elswick re same; begin to review and analyze expert disclosures on legal issues in case; draft e-mail to Rick Hoffman re follow up with opposing counsel; draft e-mail to receiver re legal expert opinions.	2.40	840.00
06/07/2021	MML	Review/analyze expert reports disclosed by Heideman; research re admissibility of expert opinion on purely legal issues.	1.90	418.00
	DCC	Telephone conference with receiver re expert reports in case; telephone conference with MMLongson re issues in case and issues re experts; review e-mail from receiver re Judge Nuffer oral ruling; review email re issues re expert report and prior representation; e-mail exchanges with Justin Elswick re discovery items; follow up e-mail exchange with Cristian Gomez re document issues.	1.30	455.00
06/08/2021	MML	Review/analyze notes and analysis from receiver re expert reports.	0.60	132.00
	DCC	Read e-mail and notes from receive re putative experts and their reports.	0.50	175.00
06/09/2021	MML	Research re untimely expert reports and standards for prejudice; confer with DCCastleberry re same; review and analyze Boley expert report opinions on amounts billed.	1.70	374.00
	DCC	Draft e-mail to MMLongson re Judge Nuffer decision re Rasmussen.	0.20	70.00
06/10/2021	DCC	Analyze expert issues; legal research re same; review file re same; provide instruction to MMLongson re same; review case law re expert opinions on legal issues and e-mail from MMLongson re same.	2.20	770.00

Page No: 3
 Statement Date: 06/30/2021
 Account No: 21868-00020
 Statement No: 62954

RaPower-3, LLC Receivership

		Hours	
	MML Analyze issues re expert deposition and grounds for exclusion; research re same and e-mail DCCastleberry summary of research.	2.00	440.00
06/11/2021	MML Draft Motion to Exclude Defense Experts; research re standards for same.	3.00	660.00
	DCC Read e-mail re expert reports; read follow up e-mail re same; begin to study expert reports from Defendant.	0.50	175.00
06/14/2021	DCC Read email re expert counter report; begin review of expert report; draft e-mail to Rick Hoffman and Wayne Klein re same.	0.30	105.00
06/15/2021	MML Draft/revise Motion to Exclude Experts; research re expert testimony on state of mind and intent.	2.90	638.00
	DCC Legal research re expert issues in case; draft e-mail to Rick Hoffman re follow up questions and re counter report; draft e-mail to MMLongson re expert issues; read e-mail from MMLongson re status of motion to exclude experts.	1.00	350.00
06/16/2021	MML Analyze issues re expert depositions and reports; research re permitted scope of testimony when experts are not deposed; review/analyze RaPower documents for potential indemnification provisions supporting Boley expert opinion; draft/revise Motion to Exclude Experts.	4.20	924.00
	DCC Telephone conference with Wayne Klein re Heideman discovery issues and re expert issues; analyze scope of expert report and conference with MMLongson re follow up research re same; read e-mail from Rick Hoffman and draft reply re same; review email from receiver re same; review and respond to e-mail from opposing counsel re meet and confer; review and analyze case law on expert issues from MMLongson; follow up e-mail exchanges with opposing counsel re meet and confer; identify issues re possible subpoena to expert.	1.90	665.00

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 Statement Date: 06/30/2021
 Account No: 21868-00020
 Statement No: 62954

RaPower-3, LLC Receivership

		Hours	
06/17/2021			
MML	Prepare for and join Rule 37 meet and confer call with opposing counsel re DOJ communications; review e-mail from opposing counsel stating positions re same.	0.80	176.00
DCC	Meet and confer with opposing counsel re case; telephone conference with receiver re issues raised; discuss issues in receivership order; research re privilege issues raised; draft e-mail to opposing counsel forwarding prior correspondence and reason for privilege; review e-mail from opposing counsel re issues raised, etc.; draft e-mail to receiver re same.	2.00	700.00
06/18/2021			
MML	Research re common interest and work product privileges in receivership context.	0.60	132.00
DCC	Research and analysis re outstanding issues related to expert and re claims at issue; email exchanges with opposing counsel re expert depositions; draft e-mail to receive re proposed strategy; review email from receiver re proposed strategy; email exchanges with expert re same; draft e-mail to opposing counsel re same.	2.80	980.00
06/21/2021			
MML	Draft/revise Motion to Exclude Experts and research re issues raised in same; review proposed meet and confer response to Heideman and correspondence with client re same.	1.70	374.00
DCC	Prepare for call with expert and study expert report of Rasmussen; telephone conference with expert re issues in case; read decision excluding defendant's expert in former case; read e-mail from receiver re privilege issues and telephone conference re same with receiver re ethics opinions and send e-mail re same; telephone conference re issues in case re counsel; draft letter to opposing counsel re privilege issues and prepare privilege in Heideman case and edit and revise same; read email from Rick Hoffman re deposition; read follow up email from Rick Hoffman re deposition, review e-mail from opposing counsel; draft e-mail follow up with opposing counsel re depositions; telephone conference		

RaPower-3, LLC Receivership

Page No: 5
 Statement Date: 06/30/2021
 Account No: 21868-00020
 Statement No: 62954

		Hours	
	with receive re approval of settlement process and review e-mail and latest motion for approval of settlements; follow up with receiver re privilege issues and telephone conference re same and draft e-mail to receiver re same; review e-mail from Justin Heideman re privilege issues and draft e-mail to receiver re same.	5.30	1,855.00
06/22/2021	DCC Review e-mail from receiver re Rule 37 motion; read e-mail from Justin Elswick re expert depositions.	0.40	140.00
06/24/2021	DCC Read e-mail from opposing counsel re expert depositions; draft follow up email re same; outline need for motion to extend expert discovery, etc.	0.50	175.00
06/28/2021	DCC Read and respond to e-mail from receiver re expert issues.	0.20	70.00
06/30/2021	DCC Follow up re expert disclosures and review file re same; e-mail exchange with MMLongson re arguments to raise and background re same in light of previous rulings by Judge Nuffer.	0.40	140.00
	For Current Services Rendered	<u>45.40</u>	<u>13,186.00</u>

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	24.70	\$350.00	\$8,645.00
Cortney A. Jones	0.20	155.00	31.00
Mitch M. Longson	20.50	220.00	4,510.00

Expenses

Computer Research Westlaw	<u>349.89</u>
Total Expenses	349.89
Total Current Work	13,535.89

RaPower-3, LLC Receivership

Page No: 6
Statement Date: 06/30/2021
Account No: 21868-00020
Statement No: 62954

Previous Balance \$33,696.72

Balance Due \$47,232.61

Taxpayer ID # 84-1395129

EXHIBIT B-4



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

INVOICE

PRIVILEGED & CONFIDENTIAL

Federal ID No. 26-2104291

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

Invoice Date: 05/03/2021
Invoice No. 23484
Page No. 1

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

Previous Balance	\$16,180.28
Balance Due	<u>\$16,180.28</u>

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>	
0.00	11,535.15	3,448.13	1,197.00	0.00	0.00	

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



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

INVOICE

PRIVILEGED & CONFIDENTIAL

Federal ID No. 26-2104291

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

Invoice Date: 06/01/2021
 Invoice No. 23851
 Page No. 1

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

Fees

			Rate	Hours	
05/06/2021	CGO	Review distributions to Roger Freeborn	135.00	2.00	270.00
05/14/2021	CGO	Requests from Counsel	135.00	0.50	67.50
	CFO	Data Entry	90.00	4.00	360.00
05/17/2021	RHO	confer on response from opposing counsel with Christian	382.50	0.50	191.25
	CGO	Communication with Receiver	135.00	0.50	67.50
05/18/2021	CFO	Data Entry	90.00	1.00	90.00
	RHO	coordinate schedules with counsel, discuss response to letter with Cristian	382.50	0.50	191.25
	CGO	Prepare/Organize Support Files - Prepared case binders for delivery and support to client or for deposition preparation	135.00	5.00	675.00
05/19/2021	CFO	Data Entry	90.00	2.00	180.00
05/25/2021	KBA	Prepare/Organize Support Files - Prepared case binders for delivery and support to client or for deposition preparation	130.50	1.00	130.50
	CGO	External Conference - Communication with client and/or counsel.	135.00	0.25	33.75
05/26/2021	RHO	coordinate scheduling with Wayne, Jeff, and Christian and discuss depo preparation with Christian.	382.50	0.20	76.50
	CGO	File Review; External communication	135.00	4.50	607.50
	CFO	Data Entry	90.00	0.50	45.00
05/27/2021	CGO	Binder Management	135.00	2.50	337.50
		For Current Services Rendered		24.95	3,323.25

Hours - Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Total</u>
Kathryn Bacca, Analyst	1.00	\$130.50
Chelsea Fox, Administrative	7.50	675.00
Rick Hoffman, Principal	1.20	459.00

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: 06/01/2021
 Invoice No. 23851
 Page No. 2

<u>Timekeeper</u>	<u>Hours</u>	<u>Total</u>
Cristian Gomez, Analyst	15.25	2,058.75
 Total Current Work		 3,323.25
Previous Balance		\$16,180.28
 Balance Due		 <u>\$19,503.53</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>
3,323.25	0.00	11,535.15	4,645.13	0.00	0.00



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

INVOICE

PRIVILEGED & CONFIDENTIAL

Federal ID No. 26-2104291

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

Invoice Date: 07/01/2021
 Invoice No. 24068
 Page No. 1

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

Fees

			Rate	Hours	
06/01/2021	CGO	External Conference - Communication with client and/or counsel.	135.00	0.50	67.50
06/02/2021	CGO	Email communication	135.00	0.25	33.75
06/04/2021	CFO	Data Entry	90.00	3.50	315.00
06/07/2021	CGO	Analyses requested by Receiver	135.00	2.00	270.00
	RHO	prepare for deposition by reading case materials	382.50	2.25	860.63
	RHO	prepare for deposition by meeting with Jeff balls and Wayne Klein	382.50	1.00	382.50
06/08/2021	RHO	review documents for deposition preparation	382.50	2.50	956.25
	CGO	Assist in deposition preparation	135.00	3.00	405.00
06/09/2021	RHO	prepare for and attend deposition, discuss next steps with staff	382.50	2.25	860.63
06/15/2021	CGO	Analyze Opposing Expert Report	135.00	5.25	708.75
	RHO	partial review of Derk Rasmussen report	382.50	1.50	573.75
06/18/2021	CFO	Data Entry	90.00	1.00	90.00
06/21/2021	CGO	External Conference - Communication with client and/or counsel.	135.00	0.75	101.25
	CFO	Data Entry	90.00	1.00	90.00
	RHO	conference call on responding to the report of derk	382.50	0.75	286.88
06/25/2021	CGO	Draft Reay report	135.00	1.75	236.25
	CFO	Data Entry	90.00	3.00	270.00
06/26/2021	CGO	Email attorney	135.00	0.25	33.75
06/28/2021	CGO	Finalize Reay Report	135.00	0.75	101.25
06/29/2021	CFO	Data Entry	90.00	3.50	315.00

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: 07/01/2021
 Invoice No. 24068
 Page No. 2

	Rate	Hours	
For Current Services Rendered		36.75	6,958.14

<u>Timekeeper</u>	<u>Hours - Summary</u>	<u>Hours</u>	<u>Total</u>
Chelsea Fox, Administrative		12.00	\$1,080.00
Rick Hoffman, Principal		10.25	3,920.64
Cristian Gomez, Analyst		14.50	1,957.50

Total Current Work	6,958.14
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Previous Balance	\$19,503.53
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Balance Due	<u>\$26,461.67</u>
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<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>
10,281.39	0.00	0.00	11,535.15	4,645.13	0.00