

EXHIBIT B-1

RaPower-3, LLC
Time Detail for Receiver and Klein & Associates
January 1, 2022 to March 31, 2022

Date	Worker	Hours	Rate	Amount	Description	Category
3/3/2021	WK	4.6	250.00	1,150.00	Meet with J. Balls to discuss strategy for Snow and Taylor trials including identifying witnesses and exhibits (1.3); revise trial exhibit summary; identify and copy exhibits, send to J. Balls (3.2); read Tenth Circuit order on Hamblin death, NSDP submission to Tenth Circuit (.1).	Litigation
12/29/2021	WK	2.2	250.00	550.00	Read Curtis Snow opposition to summary judgment; work preparing response to statements of additional facts.	Litigation
12/30/2021	WK	0.2	250.00	50.00	Call with Mark Rose re: Rowbotham payments and judgment; notes of call.	Asset Recovery
12/30/2021	WK	0.1	250.00	25.00	Review information from Lone Peak on payments from C. Snow; pay utility invoice.	Financial analysis
12/30/2021	WK	3.4	250.00	850.00	Finish response to C. Snow statement of additional facts and comments on arguments; read Snow declaration, send to J. Balls with comments (2.4); read C. Taylor opposition to summary judgment and declaration; create summary of responses to Taylor statement of additional facts and arguments, send to J. Balls with comments (1.0).	Litigation
12/31/2021	WK	0.2	250.00	50.00	Record deposits, log settlement payments; review status of settlements to identify delinquencies.	Financial analysis
1/3/2022	WK	0.1	250.00	25.00	Review notice from Wells Fargo of rejected payment from Ina Newman, send notice to Newman attorney.	Financial analysis
1/3/2022	WK	0.2	250.00	50.00	Call with attorney in Delta re: collecting amounts owed by G. Shepard; notes of call.	Litigation
1/4/2022	WK	2.5	250.00	625.00	Prepare financial summary for fourth quarter; get court docket entries; revise property list; begin drafting status report.	Status Report
1/4/2022	WK	0.2	250.00	50.00	Reconcile bank statements.	Financial analysis
1/5/2022	WK	0.1	250.00	25.00	Call with T. Belchak on additional deposit needed and closing on 10 acres; location of five acres being offered for sale.	Asset Disposition
1/5/2022	WK	3.1	250.00	775.00	Read status update from Enviro Care, respond; research docket entries; work on report; finish draft report, send to DOJ and Parr Brown for review.	Status Report
1/6/2022	WK	0.1	250.00	25.00	Record deposits; update settlement log; review Summit Realty tax notice.	Financial analysis

1/6/2022 WK	1.8	250.00	450.00	Identify 1099s to be sent; respond to BRG; search files, email payees of funds to request W-9.	Tax Preparation
1/7/2022 WK	0.5	250.00	125.00	Extended call with potential buyer of properties, send information (appraisals, property descriptions) to potential buyer.	Asset Disposition
1/7/2022 WK	0.1	250.00	25.00	Review proposed order re: Plaskolite discovery dispute, respond to J. Balls.	Litigation
1/10/2022 WK	0.1	250.00	25.00	Sign forms for release of earnest money to stalking horse bidder on 10 acres; email T. Belchak on status of additional payments due.	Asset Disposition
1/10/2022 WK	1.4	250.00	350.00	Review settlement offer by Jacqueline Freeborn, review files, send response to J. Balls, send summary to DOJ (.5); read comments from DOJ, draft settlement agreement, send (.9).	Asset Recovery
1/10/2022 WK	0.2	250.00	50.00	Receive W-9 tax forms, calls with payees, research nature of payees, revise list of forms to obtain.	Tax Preparation
1/11/2022 WK	0.1	250.00	25.00	Emails with J. Balls on J. Freeborn; revise settlement agreement, send to J. Balls.	Asset Recovery
1/11/2022 WK	0.2	250.00	50.00	Review accounts statements for LaGrand Johnson, update tracking log.	Investigation
1/11/2022 WK	0.2	250.00	50.00	Review suggested changes by DOJ, respond; revise report.	Status Report
1/11/2022 WK	0.6	250.00	150.00	Gather documents relating to revenues and expenditures in 2021, send to J. Shupe (.4); get final W-9 forms, send to BRG with summary of payments to be reported (.2).	Tax Preparation
1/12/2022 WK	0.8	250.00	200.00	Review information from Sahara Motors requesting title for additional vehicle; complete DMV forms; call with insurance agent to renew warehouse insurance.	Asset Recovery
1/12/2022 WK	0.4	250.00	100.00	Review J. Balls comments on status report, create redline, send for filing.	Status Report
1/12/2022 WK	1.6	250.00	400.00	Research information requested by Lone Peak on trial dates for various defendants; research Snow and Taylor false statements in SEC filings (.9); call with DOJ; send asset search reports, link to news story; notes of call (.7)	Litigation
1/13/2022 WK	0.6	250.00	150.00	Draft motion to approve settlement with Freeborn, send to J. Balls for review.	Asset Recovery
1/14/2022 WK	0.2	250.00	50.00	Call with Insurance agent on warehouse policy, pay renewal; review and sign insurance renewal forms.	Asset Recovery
1/19/2022 WK	1.3	250.00	325.00	Call with Lone Peak and Manning Curtis on demonstrative exhibits to use in Heideman trial (.2); review Lone Peak slides for accuracy; research dates of events, notify Lone Peak of change in assumptions (1.1).	Litigation
1/21/2022 WK	0.3	250.00	75.00	Respond to emails on inquiry notice by insiders and Plaskolite officials.	Investigation
1/21/2022 WK	3.8	250.00	950.00	Review draft summary judgment reply for Snow; download SEC filings; review files; legal research; create redline, send with comments to J. Balls (2.9); read appeal reply brief by commission recipients (.9).	Litigation

1/24/2022 WK	0.5	250.00	125.00	Review information from T. Belchak on inability to close on 10-acre parcel, respond; notify L. Mathews to offer property to original bidder.	Asset Disposition
1/24/2022 WK	1.1	250.00	275.00	Review draft reply brief for Taylor summary judgment motion, create redline, send to J. Balls (1.0); review files, respond to J. Balls on sources of email printouts (.1).	Litigation
1/25/2022 WK	0.9	250.00	225.00	Read court ruling on Plaskolite claim of attorney privilege; read Plaskolite brief opposing summary judgment and Plaskolite reply in support of its MSJ.	Litigation
1/26/2022 WK	0.3	250.00	75.00	Get signed settlement agreement, settlement payment from J. Freeborn; revise motion to approve settlement, send to J. Balls; record settlement payment, pay utility bill.	Asset Recovery
1/26/2022 WK	0.6	250.00	150.00	Call with DOJ (.3); review Lone Peak demonstratives for Heideman trial, create markup, send with comments (.3).	Litigation
1/27/2022 WK	0.2	250.00	50.00	Call with T. Belchak on 10-acre parcel, reasons for refusal to refund bid deposit.	Asset Disposition
1/27/2022 WK	0.2	250.00	50.00	Comments to D. Castleberry on how to respond to settlement inquiry by Heideman.	Litigation
1/28/2022 WK	0.1	250.00	25.00	Read information from broker on Taholo interest in property; respond to title company on notice of interest filed by T. Belchak.	Asset Disposition
1/28/2022 WK	0.2	250.00	50.00	Call with D. Castleberry on new trial dates for Heideman trial, how to deal with conflicting date.	Litigation
1/31/2022 WK	1.2	250.00	300.00	Read, sign reinstatement of REPC for 10-acres (Taholo buyers) (.1); respond to L. Mathews on inquiries about warehouse, process for selling in light of buyer desire for zoning change (.5); review draft lien releases; email J. Dunn requesting releases by T. Belchak; respond with copies of lien notices (.6).	Asset Disposition
1/31/2022 WK	0.2	250.00	50.00	Call from J. Carlson about priorities of claims for Shepard assets.	Investigation
1/31/2022 WK	1.0	250.00	250.00	Review trial orders for Heideman; review Manning Curtis pre-trial disclosures and proof table (.5); discuss with Lone Peak what financial summaries it can create (.2); respond to D. Castleberry on Heideman trial schedule, settlement overture (.3).	Litigation
2/1/2022 WK	2.1	250.00	525.00	Trial preparation meeting with Manning Curtis (proof matrix, demonstratives, available trial dates, strategy).	Litigation
2/2/2022 WK	0.1	250.00	25.00	Reconcile bank statements.	Financial analysis
2/3/2022 WK	1.0	250.00	250.00	Read order denying Olsen motion to intervene, send comments to J. Balls.	Litigation

2/7/2022 WK	1.5	250.00	375.00	Send request to T. Belchak for release of notice of interest on 10-acre property; email J. Dunn re: release; respond to title company and buyers agent on closing (.3); review update on water right for 5-acre property (.3); legal research on releases of liens, effect of court order transferring liens; send lengthy email to title company with copies of case rulings upholding court power to invalidate liens (.9).	Asset Disposition
2/7/2022 WK	3.6	250.00	900.00	Work drafting motion for assignment of judgments to DOJ, finish and send to DOJ for review (3.3); read order denying Heideman summary judgment motion (.3).	Litigation
2/8/2022 WK	0.3	250.00	75.00	Send order denying Heideman MSJ to DOJ and Lone Peak, with comments.	Litigation
2/9/2022 WK	0.7	250.00	175.00	Review and sign closing documents for sale of 10-acre parcel (DO 3151) (.2); call with L. Mathews on deed for 10-acres, potential bidders for warehouse, lowering listing price for warehouse, setting price for 5-acres, using water at tower site (.3); receive deed, sign & notarize, send to title company (.2).	Asset Disposition
2/9/2022 WK	0.2	250.00	50.00	Receive tax notices (1099's); log settlement payment.	Financial analysis
2/9/2022 WK	1.7	250.00	425.00	Call with D. Castleberry on strategy and next steps for litigation against Heideman, including mediation (.3); send Heideman order to Parr Brown with comments (.2); call with DOJ (.5); respond to D. Castleberry on selection of mediator, trial deadlines, settlement approach (.7)	Litigation
2/10/2022 WK	0.4	250.00	100.00	Send scanned copy of signed 10-acre deed to title company; sign addendum to 5-acre parcel and warehouse (.1); read update on cyanide removal, respond (.1); call from property buyer about property available for sale (.1); send update to title company, brokers on delay in closing on 10 acre site (.1).	Asset Disposition
2/10/2022 WK	1.1	250.00	275.00	Review account statements for accounts of LaGrand, Randale; update tracking log; research property transfers and company information on property transferee; send to J. Balls with comments.	Financial analysis
2/10/2022 WK	0.6	250.00	150.00	Find Plaskolite order affirming magistrate order, send to DOJ with comments; review litigation dockets (.4); read order denying Heideman motion to disqualify Receiver's expert (Hoffman), denial of summary judgment; make notes of issues to discuss with counsel (.2).	Litigation
2/11/2022 WK	0.9	250.00	225.00	Email DOJ re: beginning garnishment process, respond to J. Balls (.2); review garnishment applications and writs, respond to J. Balls with changes to make, approval to commence (.7).	Asset Recovery

2/11/2022 WK	1.5	250.00	375.00	Discuss with Manning Curtis order denying Heideman motions, strategy for settlement discussions and mediation (.8); send copies of Ina Newman summary judgment order to Manning Curtis with comments; review files, find documents to use at Heideman mediation (.2); create list of Heideman motions that have been denied, highlight Heideman arguments in motion criticizing Receiver's lack of cost-benefit analysis (.5).	Litigation
2/14/2022 WK	0.3	250.00	75.00	Review and sign offer for 5-acre parcel; email broker on terms to add for counteroffer.	Asset Disposition
2/14/2022 WK	2.2	250.00	550.00	Send tax court opinion on Olsen to S. Bradbury; review bank statements, 1099s received; review Heideman files, add to list of denied motions (.4); review new production of documents by Plaskolite, send comments to J. Balls; mark key emails from Plaskolite counsel (1.8).	Litigation
2/15/2022 WK	0.2	250.00	50.00	Read, sign revised counteroffer for 5 acres (.1); read update on removal of cyanide, forward to DOJ (.1).	Asset Disposition
2/16/2022 WK	3.0	250.00	750.00	Review files; review draft summary judgment motion for Matt Shepard, create redline; research prior rulings; send to J. Balls with extensive comments.	Asset Recovery
2/16/2022 WK	0.1	250.00	25.00	Send Envirocare report to Delta fire chief, send inquiry to Envirocare on condition of trailer.	Investigation
2/16/2022 WK	0.1	250.00	25.00	Log and deposit settlement payment; pay BRG invoice.	Financial analysis
2/16/2022 WK	0.4	250.00	100.00	Begin work on litigation status report.	Status Report
2/17/2022 WK	2.3	250.00	575.00	Sign consent for broker to act as limited agent, send inquiry on status of counteroffer (.1); finish notice of sale results for 10 acres; email DOJ on offer for 5 acres (.8); review response from DOJ, review and pay invoice for removal of hazardous waste (.2); work on motion to sell 5-acre parcel, update property sale log; work on proposed auction procedures, proposed order, and publication notice (1.2).	Asset Disposition
2/17/2022 WK	0.7	250.00	175.00	Research court docket; finish draft litigation status report, send to J. Balls and DOJ for comments.	Status Report
2/17/2022 WK	1.8	250.00	450.00	Review files, draft declarations for insolvency experts Hoffman and Checketts, send to J. Balls with comments (1.1); review draft declaration for Receiver; create redline, sign and send (.3); review J. Balls comments on declarations for accounting expert; revise declarations, send to Lone Peak and WSRP for review (.4)	Litigation
2/18/2022 WK	4.5	0.00	0.00	Travel to and from Delta to meet with R. Greathouse and inspect warehouse. (Time not billed.)	Asset Disposition

2/18/2022 WK	0.9	250.00	225.00	Meet with R. Greathouse in Delta on purchase of backhoe, Topaz waste (and trailer cleaning), property sales; inspect Oasis warehouse.	Asset Disposition
2/23/2022 WK	0.4	250.00	100.00	Work on notice of property sale for 10 acres (.1); finish draft motion to sell 5 acre parcel (.3).	Asset Disposition
2/23/2022 WK	0.1	250.00	25.00	Emails with J. Balls on Amber Bennett settlement offer in light of garnishments.	Asset Recovery
2/23/2022 WK	0.3	250.00	75.00	Revise litigation status report.	Status Report
2/23/2022 WK	0.2	250.00	50.00	Pay expenses; log funds from equipment sale; log deposits, update settlement log.	Financial analysis
2/23/2022 WK	2.0	250.00	500.00	Receive signed accounting expert opinions for Matt Shepard summary judgment motion (.1); call with DOJ (.2); read notice of death of Roger Hamblin, send to DOJ with comments (.1); read draft summary judgment motion for Randale Johnson, create redlines, send to J. Balls with comments (1.6).	Litigation
2/24/2022 WK	4.8	250.00	1,200.00	Research payments to LaGrand Johnson to determine commissions paid (for summary judgment motion); compile list of RaPower payment and likely reasons, send to J. Balls with comment (.6); review Lone Peak expert report, call C. Gomez on exhibits needed for summary judgment motion, respond to J. Balls (.3); review new schedules to Lone Peak report, send to J. Balls; review draft summary judgment motion and declaration for LaGrand Johnson, create redline; send draft declarations to forensic experts Lone Peak and WSRP for approval and signing; send signed declaration to J. Balls (1.9); call with J. Balls on garnishments, how to handle various categories of payments to LaGrand; call Lone Peak to request breakdown of payments by category; notes of call (.5); review files; revise and sign new declaration for Randale Johnson summary judgment (.1); review categorized list of payments to LaGrand, send to J. Balls with comments (.4); read and sign revised declaration for LaGrand MSJ (.2); read order denying Receiver's summary judgment motion for Heideman, call with D. Castleberry on strategy, next steps (.8).	Litigation
2/24/2022 WK	0.5	250.00	125.00	Review files; respond to J. Balls on request by Amber Bennett for lower settlement amount; call with J. Balls on Thomas Mooney promise of payment to avoid garnishment; notes of call.	Asset Recovery

2/25/2022 WK	1.6	250.00	400.00	Send copy of order denying Receiver's summary judgment motion on Heideman to J. Balls and DOJ with comments (.8); read order denying Receiver's summary judgment motion for Snow, call with J. Balls on strategy (.5); search SEC registration filings (on EDGAR system) to identify when IAS began focusing only on solar (.3).	Litigation
2/26/2022 WK	0.8	250.00	200.00	Research IAS filings on EDGAR to identify trial exhibits for Snow & Taylor; read DOJ comments on Heideman ruling, respond.	Litigation
2/28/2022 WK	0.2	250.00	50.00	Send draft notice of sale results and proof of publication on 10 acres property to J. Balls for filing; send draft motion for sale of 5 acres (3276-1-1).	Asset Disposition
2/28/2022 WK	4.1	250.00	1,025.00	Work analyzing timing of payments to Snow; find SEC filings and IAS minutes showing dates of board action; discuss with Lone Peak what financial analysis might show (1.8); meet with J. Balls on evidence showing reasons for payments to Taylor and Snow; find information on formation of RaPower (1.4); work reviewing 10Q and 10K reports for IAS (to discern corporate strategy at various times) (.6); read order denying Receiver's summary judgment motion for Taylor (.3).	Litigation
2/28/2022 WK	0.3	250.00	75.00	Revise litigation status report, send for filing.	Status Report
2/28/2022 WK	1.4	250.00	350.00	Read, sign mediation documents for Heideman, send comments to D. Castleberry on what to include in mediation brief.	Litigation
3/1/2022 WK	0.1	250.00	25.00	Deposit and record settlement payments.	Financial analysis
3/1/2022 WK	0.7	250.00	175.00	Review Wisconsin credit union refusal to honor garnishment on Tilden, research whether notice was filed in Wisconsin, respond to J. Balls on strategy.	Asset Recovery
3/1/2022 WK	5.8	250.00	1,450.00	Search SEC EDGAR filings; search files for documents showing breach of fiduciary duty; legal research; create table (demonstrative) showing the financial history of IAS; send update to J. Balls.	Litigation
3/2/2022 WK	5.9	250.00	1,475.00	Finish review of IAS 10Q and 10K filings, summarize information in planned trial exhibit (3.5); create timeline comparing dates of key events for Snow and Taylor with timing of payments; search depositions and files for evidence of badges of fraud (2.1); read Tenth Circuit ruling rejecting Glenda Johnson's appeal of contempt sanction, send to DOJ with comments; send comments to J. Balls (.3).	Litigation
3/2/2022 WK	0.1	250.00	25.00	Reconcile bank statements.	Financial analysis

3/4/2022 WK	0.2	250.00	50.00	Review draft pre-trial disclosures for Snow and Taylor, send comments to J. Balls.	Litigation
3/7/2022 WK	0.2	250.00	50.00	Review settlement offer from Trudy Shepherd, read asset report; review files, respond to J. Balls.	Asset Recovery
3/7/2022 WK	0.1	250.00	25.00	Email J. Balls with questions on strategy for pending summary judgment motions against LaGrand and Randale Johnson and Matt Shepard.	Litigation
3/8/2022 WK	1.7	250.00	425.00	Draft settlement agreement for Trudy Shepherd, send to J. Balls; read and respond to J. Balls on strategy for pending summary judgment motions (.8); draft settlement agreement for Amber Bennett (.4); respond to L. Mathews on sale of 5 acre parcel; draft settlement agreement for T. Mooney, send to J. Balls (.5).	Asset Recovery
3/8/2022 WK	0.2	250.00	50.00	Revise litigation status report, sign and send for filing.	Litigation
3/9/2022 WK	0.6	250.00	150.00	Emails with J. Balls on changes to settlement agreement for Amber Bennett and Mooney; revise agreements and send with signatures and redlines; read Tenth Circuit order on information NSDP needs to provide re: Hamblin death (.4); call with J. Balls on Trudy Shepherd settlement, her desire to allow appeal to continue, send wiring instructions.	Asset Recovery
3/9/2022 WK	1.1	250.00	275.00	Read motion to postpone criminal trial, respond to DOJ; send Hamblin deposition transcript to E. Wall (.4); call with DOJ (.4); send to DOJ Snow and Taylor trial exhibit showing badges of fraud juxtaposed with timeline, include comments (.3).	Litigation
3/11/2022 WK	1.5	250.00	375.00	Meet with Parr Brown litigation team to set trial strategy for Snow and Taylor.	Litigation
3/14/2022 WK	1.3	250.00	325.00	Review draft mediation statement for Heideman, create redline, send to M. Longson with comments (.8); read, revise jury questionnaire, jury instructions for Snow and Taylor; emails with J. Balls (.5).	Litigation
3/17/2022 WK	0.2	250.00	50.00	Get filed motion for sale of 5 acres (DO 3276-1-1), send to L. Mathews; get copy of filed notice of sale results for 10-acres (DO 3151).	Asset Disposition
3/17/2022 WK	0.9	250.00	225.00	Draft motion to approve settlement agreements with Bennett and Mooney (and notification of payment by Sajec); prepare proposed order, send to J. Balls.	Asset Recovery
3/17/2022 WK	0.2	250.00	50.00	Deposit and log settlement payments (.1); read letter from publisher on book royalties for Shepard, respond to DOJ (.1).	Financial analysis
3/17/2022 WK	0.7	250.00	175.00	Read case on what SJ findings apply to trial, respond to D. Castleberry; send case to J. Balls with comments (.5); read appeals court order on Hamblin death; read notice and scheduling hearing for Snow and Taylor hearings, respond to J. Balls (.2).	Litigation

3/19/2022 WK	0.5	250.00	125.00	Read Snow and Taylor pretrial disclosures and email from J. Balls on joinder for trial; search for exhibits; send redline of draft motion to join cases for trial, find and send copies of DOJ exhibits.	Litigation
3/21/2022 WK	0.2	250.00	50.00	Review three garnishment responses and requests for hearing (Tilden, Hadderton, Howell).	Asset Recovery
3/21/2022 WK	0.6	250.00	150.00	Discuss status of Heideman case with C. Gomez (.3); read draft motion in limine re: Snow testimony, create redline, send to J. Balls with comments (.3).	Litigation
3/22/2022 WK	0.6	250.00	150.00	Search for copies of DOJ exhibits, send exhibit list to Parr Brown, request exhibits from DOJ (.2); emails with J. Balls, call with J. Balls on Snow motion in limine, when solar revenue began (.2); review advanced jury questionnaire, send redline and comments to J. Balls (.2).	Litigation
3/23/2022 WK	0.1	250.00	25.00	Send information to Utah environmental regulator on removal and incineration of waste.	Asset Disposition
3/23/2022 WK	0.5	250.00	125.00	Write to Human Kinetics requesting turnover of Shepard royalty funds, send W-9.	Asset Recovery
3/23/2022 WK	0.3	250.00	75.00	Review LaGrand and Randale Johnson account statements; update tracking log; record deposits.	Financial analysis
3/23/2022 WK	0.1	250.00	25.00	Read notices of corporate expirations in other states.	Case Administration
3/23/2022 WK	1.2	250.00	300.00	Review exhibits from DOJ to be used in Snow and Taylor trial; send correction of request to DOJ; read Snow and Taylor motions in limine (.3); call with DOJ (.3); revise draft motion to assign judgments to DOJ, create proposed order, send to J. Balls for filing (.6).	Litigation
3/24/2022 WK	0.4	250.00	100.00	Call with D. Castleberry on preparations for Heideman mediation, send pretrial disclosures and motions in limine for Snow and Taylor.	Litigation
3/25/2022 WK	1.0	0.00	0.00	Travel to and from Provo for mediation with Heideman & Associates. (Travel time billed at 1/2 rate).	
3/25/2022 WK	1.0	250.00	250.00	Travel to and from Provo for mediation with Heideman & Associates. (Travel time billed at 1/2 rate).	Litigation
3/25/2022 WK	7.7	250.00	1,925.00	Mediation with Heideman & Associates in Provo.	Litigation
3/28/2022 WK	1.6	250.00	400.00	Index contents of NSDP boxes (finish boxes 17, 19).	Investigation
3/28/2022 WK	0.2	250.00	50.00	Receive and log settlement payments, garnishment funds; create tracking log for garnishment receipts.	Financial analysis

3/28/2022 WK	3.4	250.00	850.00	Emails with J. Balls on results of Heideman mediation, respond to inquiry on new trial dates for Snow & Taylor; get filed motion and approval of settlement agreements (#13); update tracking log (.7); review files; gather and send trial exhibits to J. Balls for Snow and Taylor combined trial (2.7).	Litigation
3/29/2022 WK	0.3	250.00	75.00	Call with D. Castleberry on Heideman request for changes to settlement terms; revise Heideman settlement agreement, send to D. Castleberry.	Litigation
3/30/2022 WK	0.5	250.00	125.00	Get information on new trial date for Snow/Taylor; notify Lone Peak; respond to J. Balls (.1); respond to J. Balls on receipt of settlement funds, approve filing satisfactions of judgment (.1); emails with J. Balls on Tenth Circuit oral argument; read notice filed with Tenth Circuit on Hamblin death, review assets search results for Hamblin; respond to J. Balls on strategy; get update on notices filed on other defendants re: satisfaction of judgments (.3).	Litigation
3/31/2022 WK	0.2	250.00	50.00	Deposit and log settlement payments, refund; go to Heideman office to pick up settlement payment, update log.	Financial analysis
3/31/2022 WK	1.6	250.00	400.00	Email DOJ on terms of Heideman settlement, request approval (.7); draft motion to approve settlement agreement for Heideman, send to D. Castleberry for review, with comments (.9).	Asset Recovery
Totals		<u>130.1</u>	<u>31,150.00</u>		

EXHIBIT B-2



April 27, 2022

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

Invoice: 907600
Client: 176390
Matter: 3

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Appeal

Professional Services	\$ 1,015.00
Total Costs Advanced	<u> \$.00</u>
TOTAL THIS INVOICE	\$ 1,015.00



Invoice: 907600
 RaPower-3 Receivership
 Appeal

April 27, 2022
 Client: 176390
 Matter: 3

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/21/22	JAB	Review reply appellate brief; Email Wayne Klein re same	.70	203.00
3/02/22	JAB	Review court order on Glenda Johnson appeal; Email Wayne Klein re same	.20	58.00
3/08/22	JAB	Review order re notice of death	.10	29.00
3/15/22	JAB	Review notice from court; Review appellate proceedings	.50	145.00
3/16/22	JAB	Draft oral argument forms	.40	116.00
3/17/22	JAB	Review order from court re Hamblin; Email Wayne Klein re same	.20	58.00
3/21/22	JAB	Review and revise stipulated motion to dismiss appeal; Email Steve Paul re same	.20	58.00
3/24/22	JAB	Review appellate documents for Amber Bennett	.10	29.00
3/29/22	JAB	Review appellate court status; Review appellate briefs	.40	116.00
3/30/22	JAB	Review appellate briefs; Email Wayne Klein re court status; Review response filed by Digital Wave Energy	.70	203.00

TOTAL PROFESSIONAL SERVICES \$ 1,015.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jeffery A Balls	290.00	3.50	1,015.00
TOTALS		3.50	\$ 1,015.00

TOTAL THIS INVOICE \$ 1,015.00



April 27, 2022

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

Invoice: 907600
Client: 176390
Matter: 3

REMITTANCE ADVICE

RE: Appeal

BALANCE DUE THIS INVOICE \$ 1,015.00

Please return this advice with payment to:

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

Wire Transfer Instructions:

JP Morgan Chase Bank
201 South Main St Ste 300
Salt Lake City, UT 84111-2870
Swift Code #: CHASUS33
ABA #: 021000021
Parr Brown Gee & Loveless
Account #: 912454114

To Pay by Credit Card:

Visa Mastercard Discover Amex
Credit Card # _____
Expiration Date ____/____
Security Code # _____
Name on Account: _____
Billing Address: _____
Amount: \$ _____
Payments accepted by phone (801) 532-7840

ACH Payment Instructions

ABA Routing #: 124001545
Account #: 912454114

Online Payment: www.parrbrown.com

Please reference your invoice # 907600

Payable Upon Receipt

A finance charge of twelve percent (12%) per annum will accrue on any account not paid within thirty (30) days after the date of this invoice





April 27, 2022

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

Invoice: 907601
Client: 176390
Matter: 4

INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

RE: Litigation

Professional Services	\$ 77,748.00
Total Costs Advanced	<u>\$ 1,197.40</u>
TOTAL THIS INVOICE	\$ 78,945.40



Invoice: 907601
 RaPower-3 Receivership
 Litigation

April 27, 2022
 Client: 176390
 Matter: 4

PROFESSIONAL SERVICES RENDERED

Date	Tkpr	Description	Hours	Amount
1/03/22	JAB	Review status of litigation matters; Call Steven Paul; Telephone conference with Jacqueline Freeborn; Draft motion to extend deadlines; Review asset reports	2.30	667.00
1/04/22	JAB	Review notice of filing transcript; Review NSDP documents	5.60	1,624.00
1/05/22	JAB	Draft garnishment documents; Review NSDP documents; Review proposed amended scheduling order for NSDP matter; Email Mike Skolnick re same and document production	4.10	1,189.00
1/06/22	JAB	Review documents from NSDP; Review correspondence from Mike Skolnick	4.70	1,363.00
1/07/22	JAB	Draft order on objection to magistrate order; Draft notice of filing proposed order; Draft garnishment documents; Review asset analysis; Email Phenix re same	2.80	812.00
1/08/22	JAB	Review NSDP documents	2.00	580.00
1/10/22	JAB	Draft reply memorandum in support of motion for summary judgment; Telephone conference with Steven Paul; Telephone conference with Jacqueline Freeborn; Email Wayne Klein re Freeborn settlement; Review quarterly report; Correspond with Cynthia Love re case status	4.80	1,392.00
1/11/22	JAB	Review correspondence from Steven Paul re bank statements; Email Wayne Klein re same; Draft letter to Jacqueline Freeborn; Review Jacqueline Freeborn Settlement agreement; Review errata to Snow opposition to motion for summary judgment	1.60	464.00
1/12/22	JAB	Review and revise thirteenth quarterly report; Draft garnishment documents	3.60	1,044.00
1/13/22	JAB	Draft reply memorandum in support of motion for summary judgment against Stacy Curtis Snow; Review NSDP documents	3.30	957.00
1/14/22	JAB	Review NSDP documents	3.80	1,102.00
1/17/22	JAB	Draft reply memoranda in support of summary judgment against Taylor and Snow	4.90	1,421.00
1/18/22	JAB	Draft reply memorandum in support of summary judgment motion re Snow and Taylor	3.20	928.00
1/19/22	JAB	Draft reply memorandum in support of summary judgment motion for Snow and Taylor	6.20	1,798.00
1/20/22	JAB	Telephone conference with Jacqueline Freeborn; Review order re objection to magistrate ruling; Draft reply memorandum in support of motion for summary judgment against Snow	6.50	1,885.00
1/21/22	JAB	Draft reply memorandum in support of motion for summary judgment re Snow; Email Wayne Klein re same; Revise memorandum for summary judgment	4.80	1,392.00
1/22/22	JAB	Draft reply memorandum for summary judgment motion against Chris Taylor	3.80	1,102.00

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 RaPower-3 Receivership
 Litigation

April 27, 2022
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 Matter: 4

Date	Tkpr	Description	Hours	Amount
1/24/22	JAB	Finalize reply memorandum in support of motion for summary judgment against Snow and Taylor; Draft appendix of evidence; Review order on objection to magistrate order; Draft motion for extension of time for LaGrand Johnson, Randale Johnson, and Matthew Shepard	3.90	1,131.00
1/25/22	JAB	Draft reply memorandum in support of motion for summary judgment against Plaskolite; Research case law re same; Telephone conference with Steven Paul; Draft motion for extension for Randale, LaGrand, and Matthew Shepard	2.20	638.00
1/26/22	JAB	Draft garnishment documents; Draft motion for summary judgment against Matt Shepard; Draft thirteenth motion for approval of settlement	5.40	1,566.00
1/26/22	SRG	Interoffice conference with Jeffery Balls re Plaskolite, Inc. case; Review motion for summary judgment against Plaskolite, Inc. and Plaskolite's opposition to same; Legal research re cases cited in opposition	3.30	841.50
1/27/22	JAB	Draft motion for summary judgment against Matthew Shepard; Draft motion to extend deadline to reply to motion for summary judgment for Plaskolite; Correspond with Phil Downey re same	3.50	1,015.00
1/28/22	JAB	Draft summary judgment against Matthew Shepard; Correspond with Monica Call; Finalize and file motion to extend time to reply in support of summary judgment motion	2.50	725.00
1/28/22	SRG	Legal research to distinguish cases cited in Plaskolite's opposition memorandum	1.70	433.50
1/29/22	JAB	Draft motion for summary judgment against Matthew Shepard	.90	261.00
1/31/22	JAB	Review NSDP documents; Telephone conference with Cynthia Love; Telephone conference with Monica Call; Telephone conference with Jacqueline Freeborn; Draft motion to dismiss Freeborn action; Email Steven Paul re same	6.70	1,943.00
1/31/22	CDL	Telephone conference with Jeff Balls re litigation status; email to opposing counsel in Hutchings matter; begin drafting stipulation re dismissal	.50	127.50
2/02/22	JAB	Conference with Steve Glauser re Plaskolite memorandum; Review order denying motion to intervene	.70	203.00
2/03/22	JAB	Draft motion to amend scheduling order for Plaskolite; Email Monica Call re same; Coordinate filing of same	.50	145.00
2/04/22	CDL	Draft stipulation for substitution of party in Hutchings matter and notice of dismissal	1.30	331.50
2/07/22	JAB	Review correspondence re sale of property	.50	145.00
2/09/22	JAB	Review order denying summary judgment in Heideman matter; Email Phil Downey re documents; Draft motion for summary judgment against Matthew Shepard and Randale Johnson	2.90	841.00
2/10/22	JAB	Draft motion for summary judgment against Matthew Shepard; Review correspondence re Johnson homes	3.80	1,102.00
2/11/22	JAB	Draft summary judgment; Review expert reports to draft declarations re insolvency; Correspond with Wayne Klein re garnishment documents; Review documents from Plaskolite	2.90	841.00

Invoice: 907601
 RaPower-3 Receivership
 Litigation

April 27, 2022
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 Matter: 4

Date	Tkpr	Description	Hours	Amount
2/14/22	JAB	Telephone conference with Glenda Johnson; Call Kathy Nester; Draft motion to amend scheduling order for Glenda Johnson	.80	232.00
2/15/22	JAB	Draft and revise motion for summary judgment against Matthew Shepard; Email Glenda Johnson	3.80	1,102.00
2/16/22	JAB	Review and revise summary judgment motion for Matt Shepard; Email Wayne Klein re same; Draft summary judgment motion for Randale Johnson	2.50	725.00
2/16/22	CDL	Begin drafting MSJ re Nelson Snuffer	3.90	994.50
2/17/22	JAB	Draft declaration of Wayne Klein for summary judgment motion; Review and revise declarations for Checketts and Hoffman; Draft motion for summary judgment against Randale Johnson	3.40	986.00
2/18/22	JAB	Telephone conference with Steven Paul; Draft motion for summary judgment for Randale Johnson	2.40	696.00
2/21/22	JAB	Draft garnishment documents; Prepare same for filing; Draft motion for summary judgment against Randale Johnson	6.30	1,827.00
2/22/22	JAB	Draft motion for summary judgment against Randale Johnson; Coordinate writ of garnishments	4.30	1,247.00
2/23/22	JAB	Draft motion for summary judgment; Coordinate filing of garnishment documents; Telephone conference with clerk; Review notice of death of Roger Hamblin; Email Wayne Klein re same; Review voicemail from Amber Bennett; Email Wayne Klein re same; Telephone conference Steve Paul re same and permission to speak with Amber Bennett; Telephone conference with Amber Bennett	8.80	2,552.00
2/24/22	JAB	Draft motions for summary judgment against LaGrand Johnson; Finalize and coordinate filings of motions for summary judgment against LaGrand Johnson, Randale Johnson, Matthew Shepard; Telephone conference with Jacqueline Freeborn; Telephone conference with Thomas Mooney; Review writs of garnishment; Telephone conference with Wayne Klein; Draft motions to exclude expert testimony	10.00	2,900.00
2/25/22	JAB	Email Amber Bennett re amount owed and settlement offer; Review writs of garnishment	1.90	551.00
2/26/22	JAB	Correspond with Wayne Klein; Review trial information for Stacy Snow	1.70	493.00
2/28/22	JAB	Email Amber Bennett; Conference with Wayne Klein; Review amended trial order for Snow; Review trial order for Taylor; Analyze claims re Snow and Taylor; Telephone conference with Steve Paul re Snow and Taylor; Telephone conference with Mike Broome re garnishment on Howell	3.80	1,102.00
3/01/22	JAB	Review correspondence from Educators Credit Union; Email Wayne Klein re same; Research law re garnishments	1.40	406.00
3/02/22	JAB	Telephone conference with Sharon Lane at Union Square Credit Union	.10	29.00
3/03/22	JOH	Prepare for and participate in meeting with Jeff Balls and Cynthia Love re case background and strategy; Review email correspondence	.70	259.00

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Date	Tkpr	Description	Hours	Amount
3/03/22	JAB	Conference with Wayne Klein; Conference with Cynthia Love and Jonathan Hafen; Review answer to garnishment; Telephone conference with Steven Paul; Draft pretrial disclosures for Stacy Snow and Chris Taylor; Review letter to 10th circuit re Hamblin; Email Steven Paul re jury questionnaire	6.00	1,740.00
3/04/22	JAB	Revise pretrial disclosures; Correspond with Steven Paul re same	.30	87.00
3/04/22	CDL	Review trial order re upcoming trial; attend logistics re same	.30	76.50
3/07/22	JAB	Review garnishee's answers to interrogatories; Review request for advanced questionnaire; Conference with Cynthia Love re trial; Correspond with Wayne Klein re summary judgment motions; Review settlement offer re Trudy Shepherd; Email Wayne Klein re same	2.90	841.00
3/07/22	CDL	Review case file in anticipation of April trial; meeting with Jeff Balls re upcoming trial	4.00	1,020.00
3/08/22	JAB	Email Wayne Klein re collections; Telephone conference with A.P. Johnson re Trudy Shepherd; Review responses to writ of garnishment; Finalize and file litigation status report; Review, revise, and file notice of sale; Review, revise, and file notice of sale result; Review and revise settlement agreement for Amber Bennett	3.00	870.00
3/09/22	JAB	Review correspondence from AP Johnson; Email Wayne Klein re same; Telephone conference re same; Telephone conference with AP Johnson; Telephone conference with Michael McBride; Draft pretrial disclosures; Correspond with court clerk re exhibit to motion for order of sale	2.00	580.00
3/10/22	JAB	Conference with Cynthia Love; Email Wayne Klein re meeting; Review correspondence re Robert Tilden garnishment; Email Robert Tilden; Telephone conference with Michael Broome	2.00	580.00
3/11/22	JOH	Team meeting re upcoming trial and case strategy; Prepare for same	2.10	777.00
3/11/22	JAB	Draft jury instructions for Snow/Taylor; Call Casey Hatch re appraisal; Review answers from garnishees; Conference with Nick Nielson re research on garnishments; Conference with Cynthia Love, Jon Hafen, and Jasmine Leonardi	4.00	1,160.00
3/11/22	CDL	Prepare for and attend meeting re trial strategy; review documents and potential exhibits re same	3.10	790.50
3/11/22	NDN	Attorney conference with Jeff Balls	.20	51.00
3/11/22	JL	Conference with Jonathan Hafen, Cynthia Love, Jeff Balls, and Wayne Klein re trial preparation	2.30	345.00
3/12/22	JAB	Draft jury instructions; Email Steven Paul re Amber Bennett settlement; Text Thomas Mooney re settlement agreement; Review garnishment answer re Trudy Shepard; Email Wayne Klein re same	2.00	580.00
3/14/22	JAB	Review settlement agreement from Amber Bennett; Email Wayne Klein re same; Draft satisfaction of judgment; Conference with Cynthia Love; Draft jury instructions	3.40	986.00
3/15/22	JAB	Review and revise jury instructions; Draft voir dire; Email Wayne Klein re same; Conference with Cynthia Love re jury instructions	3.80	1,102.00

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 Matter: 4

Date	Tkpr	Description	Hours	Amount
3/15/22	CDL	Review proposed jury instructions and verdict form; telephone conference re same	1.20	306.00
3/15/22	NDN	Research out-of-state garnishment and liens	3.40	867.00
3/16/22	JAB	Correspond with Phil Downey; Review garnishment documents	.40	116.00
3/17/22	JAB	Telephone conference with Steve Paul; Review case law re law of the case; Conference with Cynthia Love re motions in limine; Review notice of video hearing; Email Wayne Klein re same	1.10	319.00
3/17/22	NDN	Research out-of-state garnishment and liens	1.20	306.00
3/18/22	JAB	Review draft motion in limine; Draft stipulated facts; Draft motion to consolidate cases for trial; Draft notice of motion to consolidate; Email Steve Paul re same; Telephone conference with Phil Downey; Review pretrial disclosures of Snow and Taylor	3.60	1,044.00
3/19/22	JAB	Revise motion to consolidate; Email Steven Paul re same; Review pretrial disclosures of Snow and Taylor; Review requests for hearing on garnishments	.60	174.00
3/20/22	CDL	Legal research re motions in limine; review exhibits cited by defendants in their pretrial disclosures	2.10	535.50
3/21/22	JOH	Review email correspondence and related documents concerning pre-trial proceedings	.30	111.00
3/21/22	JAB	Revise stipulated motion to consolidate cases for trial; Correspond with Steven Paul re same; Conference with Cynthia Love re motions in limine; Review garnishment objections; Correspond with Nick Nielson re same; Email Wayne Klein re garnishment objections; Telephone conference with Steven Paul re jury instructions	3.20	928.00
3/21/22	CDL	Draft motion in limine; analyze potential other motions in limine; emails with client re same	3.10	790.50
3/22/22	JOH	Review email correspondence from court re upcoming Snow/Taylor trial; Follow up re same	.20	74.00
3/22/22	JAB	Email Dan Applegate re attorney fees; Review and revise motion to approve settlements; Draft order approving fourteenth settlement agreement; Conference with Cynthia Love re Snow/Taylor trial; Email chambers re trial time for Snow/Taylor; Review correspondence from Amber Bennett; Review motions in limine re damages; Conference with Cynthia Love re sale; Telephone conference with Wayne Klein re same; Draft trial brief; Review advanced jury questionnaire	5.00	1,450.00
3/22/22	CDL	Finalize motions in limine; review documents in prep for trial	1.80	459.00
3/23/22	JAB	Review proposed advanced jury questionnaire; Draft trial brief for Snow and Taylor; Review and revise motion to approve assignment of judgments; Draft proposed order granting motion for fees	1.90	551.00
3/23/22	CDL	Review motions in limine re damages in Snow-Taylor matters; begin drafting order of proof for trial; review evidence in underlying enforcement action re same	7.90	2,014.50
3/24/22	JOH	Correspond by email with Jeff Balls re trial scheduling	.10	37.00

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Date	Tkpr	Description	Hours	Amount
3/24/22	JAB	Draft trial brief; Email Wayne Klein re Plaskolite deposition; Conference with Cynthia Love re response to motion in limine; Review and revise motion in limine	4.80	1,392.00
3/24/22	CDL	Finalize and file motion to substitute party and dismiss in Hutchings matter; legal research re opposition to motions in limine; draft opposition to motions in limine; revise order of proof	6.90	1,759.50
3/25/22	JAB	Review research on garnishments; Draft trial brief	2.00	580.00
3/25/22	CDL	Revise opposition to motion in limine; email client re same; continue editing order of proof	3.10	790.50
3/26/22	JAB	Draft trial brief for Snow/Taylor; Correspond with Wayne Klein	1.10	319.00
3/28/22	JAB	Correspond with Wayne Klein; Conference with Cynthia Love re exhibits; Draft trial brief; Review garnishment documents form Wells Fargo and State Bank of Southern Utah; Email Phil Downey re deposition status; Correspond re production of documents	3.40	986.00
3/28/22	CDL	Prepare for and attend call re upcoming trial exhibits	.60	153.00
3/29/22	JOH	Review email correspondence re Taylor trial logistics; Correspond by email with Jeff Balls re same	.10	37.00
3/29/22	JAB	Correspond with Steven Paul re trial dates and advanced jury questionnaire; Draft and revise advanced jury questionnaire; Prepare for and attend scheduling conference	2.30	667.00
3/29/22	CDL	Finalize and file response to motion in limine	.60	153.00
3/30/22	JAB	Draft trial brief for Snow & Taylor; Draft satisfaction of judgment for Thomas Mooney; Email Wayne Klein re Hamblin collection efforts; Email Robb Jones re satisfaction of judgment for Kinsey; Conference with Cynthia Love re Hamblin; Research case law re post-transfer badges of fraud	3.90	1,131.00

TOTAL PROFESSIONAL SERVICES

\$ 77,748.00

SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jonathan O Hafen	370.00	3.50	1,295.00
Jeffery A Balls	290.00	218.30	63,307.00
Cynthia D Love	255.00	40.40	10,302.00
Steven R Glauser	255.00	5.00	1,275.00
Nicolas D Nielson	255.00	4.80	1,224.00
Jasmine Leonardi - Paralegal	150.00	2.30	345.00
TOTALS		274.30	\$ 77,748.00

COSTS ADVANCED

Date	Description	Amount
2/24/22	Premier Professional Services - service of writ of garnishment to MidFirst Bank	130.00

PARR BROWN GEE & LOVELESS

Invoice: 907601
 RaPower-3 Receivership
 Litigation

April 27, 2022
 Client: 176390
 Matter: 4

Date	Description	Amount
2/25/22	Constable Robert Reitz - Check issued to constable's office for rush service of writ of garnishment on Wells Fargo Bank (Jeffrey Turner)	40.00
2/25/22	Constable Robert Reitz - Check issued to constable's office for rush service of writ of garnishment on Wells Fargo Bank (Jean Armand)	70.00
2/25/22	Constable Robert Reitz - Check issued to constable's office for rush service of writ of garnishment on Chase Bank (Roger Hamblin)	70.00
2/25/22	Check issued to Finch Process Service for rush service of writ of garnishment on Educators Credit Union (Robert Tilden)	80.00
2/28/22	Constable Robert Reitz - Check issued to constable's office for rush service of writ of garnishment on Chase Bank (Janet Roe)	70.00
2/28/22	Constable Robert Reitz - Check issued to constable's office for rush service of writ of garnishment on Chase Bank (Reinhold Finkes)	40.00
2/28/22	A Precision Investigation & Consulting, LLC - check issued to A Precision Investigation & Consulting, LLC for rush service of writ of garnishment on Fidelity Investments (Trudy Shepherd)	132.40
3/02/22	Brazzle Constable Service, LLC - check issued to Brazzle Constable Service for rush service of writ of garnishment on State Bank of Southern Utah	155.00
3/03/22	Check issued to Wichita County Court Services for RUSH service of five writs of garnishment in Wichita Falls, Texas	410.00
TOTAL COSTS ADVANCED		\$ 1,197.40
TOTAL THIS INVOICE		\$ 78,945.40



April 27, 2022

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

Invoice: 907601
Client: 176390
Matter: 4

REMITTANCE ADVICE

RE: Litigation

BALANCE DUE THIS INVOICE \$ 78,945.40

Please return this advice with payment to:

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

Wire Transfer Instructions:

JP Morgan Chase Bank
201 South Main St Ste 300
Salt Lake City, UT 84111-2870
Swift Code #: CHASUS33
ABA #: 021000021
Parr Brown Gee & Loveless
Account #: 912454114

To Pay by Credit Card:

Visa Mastercard Discover Amex
Credit Card # _____
Expiration Date ____/____
Security Code # _____
Name on Account: _____
Billing Address: _____
Amount: \$ _____
Payments accepted by phone (801) 532-7840

ACH Payment Instructions

ABA Routing #: 124001545
Account #: 912454114

Online Payment: www.parrbrown.com

Please reference your invoice # 907601

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A finance charge of twelve percent (12%) per annum will accrue on any account not paid within thirty (30) days after the date of this invoice



EXHIBIT B-3



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

Statement Date: 01/31/2022
Account No: 21868

Previous Balance	Fees	Expenses	Advances	Payments	Balance
21868-00020 Heideman and Associates					
72,196.92	6,135.00	49.03	0.00	0.00	<u>\$78,380.95</u>

Taxpayer ID # 84-1395129



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Page No: 1
Statement Date: 01/31/2022
Account No: 21868-00020
Statement No: 64730

Heideman and Associates

Fees

		Hours	
01/12/2022	MML Research re Pretrial Disclosures in underlying RaPower case; review US disclosures from same case; begin draft of Pretrial Disclosures.	1.20	264.00
01/13/2022	DCC Draft follow up email to Rick Hoffman.	0.20	70.00
01/14/2022	DCC E-mail exchange with Rick Hoffman and analyze issues re same.	0.40	140.00
01/19/2022	MML Draft Pretrial Disclosures and analyze issues re will call/may call witnesses and will present/may present exhibits; join Teams call with Rick Hoffman re demonstrative exhibits.	3.20	704.00
	DCC Work on demonstrative exhibits; conference with Rick Hoffman and receiver re same; review follow up e-mail and edits re same.	1.50	525.00
01/20/2022	MML Draft Evidence and Proof Table and analyze issues re same; draft/revise Pretrial Disclosures based on Evidence and Proof Table; research re legal standards for Evidence and Proof		

Page No: 2
 Statement Date: 01/31/2022
 Account No: 21868-00020
 Statement No: 64730

RaPower-3, LLC Receivership

		Hours	
	Table; confer with DCCastleberry re trial prep and strategy.	4.60	1,012.00
DCC	Conference with MMLongson re issues re exhibits in case.	0.40	140.00
01/26/2022			
MML	Draft/revise Pretrial Disclosures; draft/revise Elements and Proof Table; communicate re same with DCCastleberry.	1.30	286.00
DCC	Work on pretrial disclosures; review emails and documents from receiver and from expert; review emails from MMLongson re burden of proof outline; review pretrial disclosure draft.	2.50	875.00
01/27/2022			
DCC	Work on trial exhibits; email exchanges with receiver and experts re same; e-mail exchange with opposing counsel re settlement; follow up e-mail re same; review filings referenced; follow up e-mail exchanges with receiver re settlement overtures and re pre-trial disclosures; e-mail exchanges re pretrial disclosures.	1.90	665.00
MML	Review/analyze Lone Peak revised demonstrative slides and client edits to same.	0.40	88.00
01/28/2022			
DCC	E-mail exchanges with MMLongson and receiver re pretrial disclosures; related follow up re same; review order from court re trial dates; conference with MMLongson re same; conference with receiver re same; work on pretrial disclosures; work on other trial issues; review updated pretrial disclosures from MMLongson and e-mail re same.	2.00	700.00
MML	Analyze issues re trial prep and strategy; review trial order from Judge Nuffer.	0.70	154.00
01/29/2022			
DCC	Edit and revise pretrial disclosures; conference with MMLongson re same; draft e-mail to receiver re elements and proof outline and re pretrial disclosures.	0.60	210.00
MML	Analyze issues re Pretrial Disclosures and inclusion of client summary of payments.	0.10	22.00

RaPower-3, LLC Receivership

Page No: 3
 Statement Date: 01/31/2022
 Account No: 21868-00020
 Statement No: 64730

Hours

01/31/2022

DCC	Read e-mail to Rick Hoffman re updated trial setting; draft e-mail to opposing counsel re new setting; review new order re voir dire; draft e-mail to receiver re correspondence from opposing counsel; review email from receiver re same and draft e-mail to receiver re same.	0.80	280.00
	For Current Services Rendered	21.80	6,135.00

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	10.30	\$350.00	\$3,605.00
Mitch M. Longson	11.50	220.00	2,530.00

Expenses

Computer Research Westlaw	49.03
Total Expenses	49.03
Total Current Work	6,184.03
Previous Balance	\$72,196.92
Balance Due	\$78,380.95

Taxpayer ID # 84-1395129



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

Statement Date: 02/28/2022
Account No: 21868

Previous Balance	Fees	Expenses	Advances	Payments	Balance
21868-00020 Heideman and Associates					
78,380.95	6,300.00	34.84	0.00	-33,779.21	<u>\$50,936.58</u>

Taxpayer ID # 84-1395129



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Page No: 1
Statement Date: 02/28/2022
Account No: 21868-00020
Statement No: 65073

Heideman and Associates

Fees

		Hours	
02/01/2022	MML Prepare for and attend meeting with client re trial and pretrial strategy; revise Pretrial Disclosures; correspond re Rick Hoffman demonstrative; analyze issues re potential RaPower lens demonstrative.	2.80	616.00
	DCC Read email re trial setting orders and note follow up needed re same; read email from receiver re same; read follow up emails re trial dates and possible new trial settings, etc.; work on issues re pretrial disclosures and read email from MMLongson re same; read draft re same and work on follow up re same; follow up email with MMLongson re same; email exchanges re demonstrative exhibits and follow up re same; research re evidentiary issues and email exchanges with MMLongson re same; meeting with receiver and with MMLongson re trial exhibits.	3.10	1,085.00
02/02/2022	MML Review and finalize Pretrial Disclosures and Demonstrative for filing; confer with DCCastleberry re demonstrative requirement and direct LLAnderson re creation of Demonstrative for service on opposing counsel.	0.80	176.00
	DCC Read email from Cristian Gomez re demonstrative exhibits; review email from MMLongson re same; review email from		

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 Statement Date: 02/28/2022
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RaPower-3, LLC Receivership

		Hours	
	MMLongson re pretrial disclosures; email exchanges with expert; file disclosures; read email from MMLongson re disclosures; email exchange with opposing counsel re trial schedule.	1.60	560.00
02/04/2022	DCC Email exchanges with expert re issues in matter; telephone conference with opposing counsel re various issues in case.	0.70	245.00
02/07/2022	MML Review/analyze Order Denying Heideman's First Motion for Summary Judgment; analyze issues re trial dates and schedule.	0.40	88.00
	DCC Draft email to courts clerk re scheduling issues; review email from opposing counsel re same issues; review email response from clerk; review order denying motion for summary judgment.	0.80	280.00
02/09/2022	DCC Telephone conference with receiver re mediation and follow up re same; conference re trial dates; email exchange with opposing counsel re same; review email re same from receiver.	1.00	350.00
02/10/2022	MML Review/analyze Memorandum and Order re Motion to Disqualify Rick Hoffman.	0.30	66.00
	DCC Email exchange with opposing counsel re stipulation re pretrial deadlines; read decision denying motion to exclude Hoffman and motion for summary judgment re same.	0.70	245.00
02/11/2022	MML Meet with client re trial and potential settlement strategy; review Ina Johnson Motion for Summary Judgment and Order.	1.00	220.00
	DCC Meeting with Receiver re mediation and trial strategy; telephone conference with opposing counsel re case generally.	1.20	420.00

RaPower-3, LLC Receivership

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 Statement Date: 02/28/2022
 Account No: 21868-00020
 Statement No: 65073

		Hours		
02/14/2022	DCC	Review email from Heideman re mediation; email exchange with receiver and with Heideman re same; follow up re stipulation re trial dates and pre-trial deadlines; edit and revise stipulation and order; email exchanges re same; review filing re same.	1.00	350.00
02/15/2022	DCC	Read email re mediation from opposing counsel and from mediator.	0.20	70.00
02/16/2022	DCC	Read order continuing trial and vacating pre-trial deadlines; conference with Miriam Strassberg re mediation; review email from Miriam Strassberg re same.	0.60	210.00
02/24/2022	MML	Review/analyze order denying Motion for Partial Summary Judgment; research re summary judgment decisions in related cases; analyze issues and communicate with DCCastleberry re same.	1.20	264.00
	DCC	Read and analyze order on motion for summary judgment; conference with MMLongson re same; conference with receiver re same; review email from receiver re same.	1.70	595.00
02/26/2022	DCC	Read and respond to email from receiver re order on motion for partial summary judgment.	0.20	70.00
02/28/2022	DCC	Conference with MMLongson re possible motions in limine and follow up re same and analysis re same; review mediation material and forward same to receiver; review email from receiver re mediation brief; draft email to receiver re same.	0.80	280.00
	MML	Analyze issues re partial summary judgment denial and mediation; review client analysis re same.	0.50	110.00
		For Current Services Rendered	<u>20.60</u>	<u>6,300.00</u>

RaPower-3, LLC Receivership

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Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	13.60	\$350.00	\$4,760.00
Mitch M. Longson	7.00	220.00	1,540.00

Expenses

Computer Research Westlaw	34.84
Total Expenses	<u>34.84</u>
Total Current Work	6,334.84
Previous Balance	\$78,380.95

Payments

02/14/2022	Payment Received Wayne Klein Receiver for RaPower Check # 1339	-33,779.21
	Balance Due	<u>\$50,936.58</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

Statement Date: 03/31/2022
Account No: 21868

Previous Balance	Fees	Expenses	Advances	Payments	Balance
21868-00020 Heideman and Associates					
50,936.58	9,995.50	28.27	0.00	0.00	<u>\$60,960.35</u>

Taxpayer ID # 84-1395129



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

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Statement Date: 03/31/2022
Account No: 21868-00020
Statement No: 65264

Heideman and Associates

Fees

		Hours	
03/07/2022	MML Begin draft of Mediation Statement.	0.30	66.00
03/08/2022	MML Draft Mediation Statement introduction, facts, and procedural history sections.	5.30	1,166.00
	DCC Read filing from court vacating hearing.	0.20	70.00
03/09/2022	MML Draft/revise Mediation Statement procedural history and issues in dispute sections.	2.30	506.00
03/10/2022	MML Draft/revise Mediation Statement legal analysis sections; research re reasonably equivalent value for costs and expenses advanced by Heideman.	4.60	1,012.00
03/11/2022	MML Draft/revise Mediation Statement sections on goals, pitfalls, and conclusion.	1.90	418.00
	DCC Sign documents re mediation and follow up re same.	0.20	70.00

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 Statement Date: 03/31/2022
 Account No: 21868-00020
 Statement No: 65264

RaPower-3, LLC Receivership

Hours

03/14/2022	MML	Direct LLAAnderson re creation of exhibits to Mediation Statement; proof Mediation Statement and send to DCCastleberry for review.	0.50	110.00
	DCC	Read email from MMLongson re mediation brief; read draft of mediation brief; work on issues re mediation brief.	1.00	350.00
03/15/2022	MML	Communicate with DCCastleberry re Mediation Statement and Rule 56(g) issues.	0.30	66.00
	DCC	Edit and revise mediation brief; legal research re Rule 56(g); legal research re motions in limine in case; analyze orders issued in case re motions for summary judgment; conference with receiver re issues re same; conference with MMLongson re issues re same.	3.50	1,225.00
03/16/2022	CAJ	Communicate with DCCastleberry re docket for trial and update same.	0.10	18.50
	MML	Review client edits to Mediation Statement.	0.40	88.00
	DCC	Read email from receiver re mediation brief; read edits to mediation brief from receiver; draft email to receiver re same.	0.50	175.00
03/17/2022	DCC	Read email from receive re Rule 56(g) motion and arguments re same.	0.20	70.00
03/18/2022	DCC	Work on issues re mediation brief; follow up re exhibits re same; edit and revise mediation brief; arrange for brief to be sent to mediator.	1.00	350.00
03/24/2022	DCC	Prepare for mediation; review mediation statement; review relevant documents re mediation; conference with receiver re mediation; read motions in limine filed in related case sent from receiver.	1.00	350.00

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 Statement Date: 03/31/2022
 Account No: 21868-00020
 Statement No: 65264

RaPower-3, LLC Receivership

Hours

03/25/2022	DCC	Prepare for mediation; conduct and participate in Mediation in Heideman case; travel related to same; legal research issues re case; edit proposed settlement agreement; follow up email with mediator and opposing party; follow up email with receiver.	8.40	2,940.00
03/28/2022	DCC	Read email from mediator re matter; compile notes re mediation; outline possible motions in limine to file in light of untimely affirmative defenses raised at mediation; follow up email exchange with mediator.	0.80	280.00
03/29/2022	DCC	Telephone conference with mediator; telephone conference with receiver; review draft of revised agreement from receiver and email re same; draft email to Justin Heideman; review email from mediator.	0.80	280.00
03/30/2022	DCC	Read and respond to email from Justin Heideman re settlement; review attached documents; draft email to receiver re same.	0.40	140.00
03/31/2022	DCC	Read email from receiver re settlement; read email from Justin Heideman re settlement and draft responsive email re same; review email and attachments from receiver; draft email to receiver re follow up; review email and draft of motion to approve settlement; draft email to receiver re same.	0.70	245.00
		For Current Services Rendered	34.40	9,995.50

Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
David C. Castleberry	18.70	\$350.00	\$6,545.00
Cortney A. Jones	0.10	185.00	18.50
Mitch M. Longson	15.60	220.00	3,432.00

RaPower-3, LLC Receivership

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Statement Date: 03/31/2022
Account No: 21868-00020
Statement No: 65264

Expenses

Photocopies	0.20
Computer Research Westlaw	<u>28.07</u>
Total Expenses	28.27
Total Current Work	10,023.77
Previous Balance	\$50,936.58
Balance Due	<u>\$60,960.35</u>

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: 02/01/2022
 Invoice No. 25724
 Page No. 1

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

Fees

			Rate	Hours	
01/11/2022	CGO	Internal Conference - Conference with Lone Peak personnel to discuss the engagement and/or coordinate future work activities.	135.00	0.50	67.50
	SYA	Internal Conference - Conference with Lone Peak personnel to discuss the engagement and/or coordinate future work activities.	171.00	0.83	141.93
01/13/2022	SYA	Trial Demonstratives: Create, review, and/or edit direct testimony or demonstrative exhibits.	171.00	2.08	355.68
01/14/2022	SYA	Trial Demonstratives: Create, review, and/or edit direct testimony or demonstrative exhibits.	171.00	0.50	85.50
01/17/2022	CGO	Internal Conference - Conference with Lone Peak personnel to discuss the engagement and/or coordinate future work activities.	135.00	0.50	67.50
	SYA	Trial Demonstratives: Create, review, and/or edit direct testimony or demonstrative exhibits.	171.00	3.92	670.32
01/18/2022	CGO	Trial Demonstratives: Create, review, and/or edit direct testimony or demonstrative exhibits.	135.00	3.25	438.75
	RHO	work on slides and trial demonstratives	382.50	1.50	573.75
	SYA	Trial Demonstratives: Create, review, and/or edit direct testimony or demonstrative exhibits.	171.00	4.34	742.14
01/19/2022	CGO	Trial Demonstratives: Create, review, and/or edit direct testimony or demonstrative exhibits.	135.00	2.00	270.00
01/20/2022	SYA	Trial Demonstratives: Create, review, and/or edit direct testimony or demonstrative exhibits.	171.00	0.75	128.25
01/26/2022	CGO	Trial Demonstratives: Create, review, and/or edit direct testimony or demonstrative exhibits.	135.00	0.50	67.50
	RHO	review slides for trial, make edits, review other suggested edits	382.50	0.75	286.88
01/31/2022	CGO	Develop, create and modify schedules and analyses	135.00	1.00	135.00

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: 02/01/2022
 Invoice No. 25724
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RHO	work on trial demonstratives	Rate	Hours	
		382.50	0.75	286.88
	For Current Services Rendered		<u>23.17</u>	<u>4,317.58</u>

Hours - Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Total</u>
Shawn Yates, Analyst	12.42	\$2,123.82
Rick Hoffman, Principal	3.00	1,147.51
Cristian Gomez, Analyst	7.75	1,046.25

Total Current Work	4,317.58
Previous Balance	\$41,111.30
Balance Due	<u>\$45,428.88</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>
4,351.33	0.00	0.00	10,355.14	25,687.41	5,035.00



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: 03/01/2022
 Invoice No. 25929
 Page No. 1

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

Fees

			Rate	Hours	
02/18/2022	CGO	File Review	135.00	0.25	33.75
02/24/2022	CGO	Develop, create and modify schedules and analyses	135.00	1.25	168.75
02/28/2022	CGO	Discussion with Receiver	135.00	0.75	101.25
		For Current Services Rendered		2.25	303.75

Hours - Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Total</u>
Cristian Gomez, Analyst	2.25	\$303.75

Total Current Work	303.75
Previous Balance	\$45,428.88

Payments

02/08/2022	Payment received - Thank you	-30,722.41
	Balance Due	<u>\$15,010.22</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>
4,621.33	33.75	0.00	10,355.14	0.00	0.00

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 SALT LAKE CITY, UTAH 84111
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INVOICE

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Federal ID No. 26-2104291

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

Invoice Date: 04/01/2022
 Invoice No. 26240
 Page No. 1

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

Fees

			Rate	Hours	
02/18/2022	RHO	review declaration and coordinate with Cristian on the declaration	382.50	0.20	76.50
03/01/2022	CGO	File Review	135.00	3.25	438.75
03/02/2022	CGO	File Review	135.00	3.50	472.50
03/14/2022	CGO	Talk with receiver about upcoming trial dates	135.00	0.50	67.50
03/21/2022	CGO	Meeting with receiver to discuss status of cases	135.00	0.50	67.50
		For Current Services Rendered		7.95	1,122.75

Hours - Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Total</u>
Rick Hoffman, Principal	0.20	\$76.50
Cristian Gomez, Analyst	7.75	1,046.25

Total Current Work	1,122.75
Previous Balance	\$15,010.22
Balance Due	\$16,132.97

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>
1,122.75	4,621.33	33.75	0.00	10,355.14	0.00

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