

# **EXHIBIT B-1**

**RaPower-3, LLC**  
**Time Detail for Receiver and Klein & Associates**  
**July 1, 2019 to September 30, 2019**

Date	Worker	Hours	Rate	Amount	Description	Category
9/30/2019	WK	2.5	0.00	0.00	Gather documents; assemble exhibits for suit against Snell & Wilmer (1.9); gather exhibits for Heideman litigation memo (.6). (Time not billed.)	Asset Recovery
8/26/2019	WK	0.3	0.00	0.00	Deposit settlement funds; meet with bankers to get higher interest rate. (Time not billed.)	Financial analysis
8/22/2019	WK	4.6	0.00	0.00	Travel to Fillmore for auction of two properties; return to Salt Lake (Time not billed.)	Asset Disposition
8/15/2019	WK	0.5	0.00	0.00	Download and print PSTC documents. (Time not billed.)	Investigation
8/7/2019	WK	0.1	0.00	0.00	Review information from lens purchaser, respond.	Investigation
8/6/2019	WK	0.3	0.00	0.00	Review Parr Brown invoices. (Time not billed.)	Financial analysis
8/5/2019	WK	0.1	0.00	0.00	Review delinquency notices for RaPower corporate filings in other states. (Time not billed)	Case Administration
8/2/2019	WK	0.7	0.00	0.00	Reconcile bank statements; confirm amounts frozen in Glenda bank accounts. (Time not billed.)	Financial analysis
8/1/2019	WK	1.7	0.00	0.00	Sign documents at Wells Fargo for wire authority; mail bid refund to K. Kesler (.3); call with M. Lehr on Phillips trust deed notice; go to Parr Brown to sign notice; additional trip to bank seeking wire authority for return of bid deposits (1.4). (Time not billed.)	Asset Recovery
7/31/2019	WK	0.5	0.00	0.00	Deposit funds from T. Belchak; log deposits. (Time not billed.)	Asset Disposition
7/29/2019	WK	0.1	0.00	0.00	Pay invoice for publication notice for auction of tower site. (Time not billed.)	Financial analysis
7/26/2019	WK	0.1	0.00	0.00	Receive, log deposit from Allianz and bid deposits.	Financial analysis
7/18/2019	WK	4.4	0.00	0.00	Travel to Fillmore for auction of Tower site; return to Salt Lake (Time not billed.)	Asset Disposition
7/18/2019	WK	1.7	0.00	0.00	Prepare files and labels for demands to send to commission recipients. (Time not billed.)	Asset Recovery
7/8/2019	WK	0.8	0.00	0.00	Enter names on spreadsheet recipients, sort information. (Time not billed.)	Investigation
7/3/2019	WK	0.1	0.00	0.00	Reconcile bank statements (time not billed.)	Financial analysis

7/1/2019 WK	1.3	0.00	0.00	Revise and edit status report; send to M. Lehr and DOJ for comments. (Time not billed.)	Status Report
8/6/2019 JS	0.5	120.00	60.00	Post on website status report, notice of property auction, motion to sell property.	Case Administration
8/2/2019 JS	2.2	120.00	264.00	Work finalizing, sending commission demand letters.	Asset Recovery
8/1/2019 JS	0.3	120.00	36.00	Work finalizing, sending commission demand letters.	Asset Recovery
7/31/2019 JS	4.7	120.00	564.00	Finish preparing demand letters, send 120 demand letters to 120 commission recipients.	Asset Recovery
7/30/2019 JS	1.0	120.00	120.00	Work on commission demand letters.	Asset Recovery
7/29/2019 JS	0.8	120.00	96.00	Work preparing demand letters to commission recipients.	Asset Recovery
7/27/2019 JS	2.1	120.00	252.00	Work preparing demand letters to commission recipients; research addresses.	Asset Recovery
7/25/2019 JS	1.2	120.00	144.00	Work preparing demands for commission recipients; research addresses for recipients.	Asset Recovery
7/18/2019 JS	0.1	120.00	12.00	Post on website order canceling shares, motion to commence litigation, status report.	Case Administration
9/30/2019 WK	0.2	250.00	50.00	Send draft notices of property sale results to M. Lehr with publication affidavits, request filing (.1); read notice of Millard County planning and zoning changes (.1);	Asset Disposition
9/30/2019 WK	3.7	250.00	925.00	Finalize litigation memo for Snell & Wilmer (.5); receive and record settlement payments, revise settlement log (.2); review five new draft complaints, approve filing (.2); get signed settlement agreement and payment from Virkus; update strategic plan; send litigation recommendation for C. Young; email attorney for Brittain on status (.7); read letter from Sorenson attorney, send respond and settlement offer; respond to C. Young on proof of payments (1.1); prepare litigation memo for Gleaves Swearingen (1.0).	Asset Recovery
9/30/2019 WK	0.5	250.00	125.00	Get copies of 5 new filed complaints; update strategic plan; get filed motion to approve conflicts counsel, send to D. Castleberry with comments (.3); read M. Lehr emails on Diane Shepard and DOJ comments, respond; read filed answer and counterclaim by Glenda Johnson (.2).	Litigation
9/28/2019 WK	0.5	250.00	125.00	Prepare notice of property sale results for 4609, 4612.	Asset Disposition
9/28/2019 WK	2.6	250.00	650.00	Review filed, prepare litigation memo on Heideman; revise and edit.	Asset Recovery
9/27/2019 WK	4.9	250.00	1,225.00	Work on litigation memo for Snell & Wilmer, revise and edit (4.5); read letter from L. Neven; review hardship affidavit; prepare and send settlement agreement (.4).	Asset Recovery

9/27/2019 WK	0.1	250.00	25.00	Call with lens purchaser on likelihood of recovery.	Case Administration
9/27/2019 WK	0.1	250.00	25.00	Read answer filed by Ina Newman; review complaint to compare her allegations on location of residence.	Litigation
9/26/2019 WK	0.4	250.00	100.00	Review and sign closing documents for property 4609 and 4612; send to title company with comments; revise property disposition list.	Asset Disposition
9/26/2019 WK	1.2	250.00	300.00	Emails with commission recipients and NSDP granting additional time to respond (.1); review draft complaints for S. King, Howell; search TX Secretary of State website for status of Rocking H (.5); review and approve complaints against Hadderton, Bennet, Bean (.3); revise litigation memo on Don Reay, send for drafting complaint; send sample complaints and rulings on suits against attorneys (.3).	Asset Recovery
9/26/2019 WK	1.8	250.00	450.00	Extended call with M. Woolley (.7); notes of call; send summary to DOJ (.6); scan and send stock transfer documents and list of documents requested (.5).	Investigation
9/26/2019 WK	0.1	250.00	25.00	Read emails from D. Castleberry and DOJ on conflict counsel; direct M. Lehr to file motion.	Litigation
9/25/2019 WK	0.2	250.00	50.00	Finalize notices of property sale results for HD 4654 and 4657, send for filing with affidavit of publication.	Asset Disposition
9/25/2019 WK	0.8	250.00	200.00	Begin reading deposition of Robert Aulds; identify and copy information relating to other defendants.	Investigation
9/25/2019 WK	5.8	250.00	1,450.00	Read letter from Rowbotham attorney, re-send tolling agreement; respond to N. Kontos with hardship affidavit, tolling agreement (.7); send revised settlement agreement to S. Virkus (.1); correspondence with Snell and Wilmer on settlement efforts, call with D. Castleberry on claims against S&W (.4); draft motion for conflicts counsel and proposed order (2.6); read letter from attorneys for Sikich and Brumfield, respond; respond to Gregg inquiry (.3); begin drafting litigation memo on John Howell (1.7).	Asset Recovery
9/25/2019 WK	2.4	250.00	600.00	Get copies of filed complaints; update strategic plan; emails with S. Virkus on settlement payment; emails with M. Lehr on Shepard turnover motion (.4); read revised DOJ reply on motion for additional sanctions, create redline; create declaration to authenticate exhibits, send to DOJ (1.3); make list of matters to discuss with DOJ (.5); get copies of additional complaints filed, update log (.2).	Litigation
9/24/2019 WK	1.1	250.00	275.00	Review and approve 5 new draft complaints; prepare one redline; approve filing; give research assignment to Lone Peak (.4); review letter from M. Amidan; prepare and send response (.7).	Asset Recovery

9/24/2019 WK	0.6	250.00	150.00	Call with third party re: investment he made with Frandsen; notes of call (.4); respond to Wisdom Farms on information given; request meeting (.2);	Investigation
9/24/2019 WK	0.1	250.00	25.00	Begin work on status report; prepare outline.	Status Report
9/24/2019 WK	1.1	250.00	275.00	Research history of Shepard tax lien searching for amount of lien; send documents to M. Lehr (.2); strategy meeting with Parr Brown (.9).	Litigation
9/23/2019 WK	0.3	250.00	75.00	Calls with Parr Brown on other bidders for property; cancel auctions for HD 4609, 4612; send directions to title company to proceed to close; get notice of successful property assessment appeal; pay publication notice.	Asset Disposition
9/23/2019 WK	4.0	250.00	1,000.00	Review hardship affidavit for Neven, respond with reasons receiver rejects hardship treatment (.5); prepare and send litigation recommendation for Mooney, Anderson, Palmore, Payne; email Ayres; update strategic plan (.8); read letter from Lambrecht; draft and send demand letter; call with J. Balls on N. Lewis, research payments, send information to J. Balls (.8); review and approve 5 additional complaints (.4); read draft turnover motion for Shepard trust property; create redline; perform legal research; send redline to M. Lehr with comments (1.5).	Asset Recovery
9/23/2019 WK	0.2	250.00	50.00	Review credit card analysis of Citibank cards, discuss with Lone Peak Valuation.	Investigation
9/23/2019 WK	0.1	250.00	25.00	Get notices of corporate filing deficiencies for RaPower in other states.	Case Administration
9/23/2019 WK	3.6	250.00	900.00	Read draft DOJ reply to its motion for additional contempt sanctions; research prior declarations by Neldon Johnson on vehicles; create redline of reply, send to DOJ with comments (1.5); review draft complaints for S. Chaston, create redline with changes, send to Parr Brown with comments; review and approve draft complaints for Kulacz, Orgill, Black (1.2); review, create redline for K. Smith complaint; get filed complaints on Frandsen/Hutchings (.2); read new draft of DOJ reply on motion for additional sanctions, send comments (.3); read M. Shepard opposition to Receiver motion to dismiss; read Glenda opposition to motion to transfer cases; respond to M. Lehr on defense request for extension of time on Glenda turnover motion (.4).	Litigation
9/20/2019 WK	1.1	250.00	275.00	Call with T. Hollen on demand against Brittain, legal defenses he claims (.2); research legal defenses, send case analysis to Hollen with comments; respond to K. Hawes; prepare and send new settlement agreement to Virkus; notes of call with Hollen (.9).	Asset Recovery
9/20/2019 WK	0.1	250.00	25.00	Call with J. Kraczek of Wisdom Farms.	Investigation

9/19/2019 WK	4.6	250.00	1,150.00	Prepare memo summarizing results of investigation and requesting filing of complaint against Hawes; email Hawes (2.2); review files, prepare litigation memo for D. Reay (1.4); review hardship affidavit for S. Virkus, research home value; prepare and send settlement agreement (.6); review Heideman files, gather document; work on litigation memo (.4).	Asset Recovery
9/19/2019 WK	0.3	250.00	75.00	Call with M. Lehr on litigation updates, strategy.	Litigation
9/18/2019 WK	4.9	250.00	1,225.00	Update litigation strategic plan and target list to show settlement discussions and abandoned targets (.3); read response by Snell & Wilmer; gather information on work by M. Woolley on Neldon divorce (.2); gather information on payments for benefit of Cindy Walker and out-of-state commission recipients, send to Parr Brown; emails with K. Anderson; call with S. Virkus; call with attorney for Sorenson; emails with attorney for Neven; write Powhatan County School Board on payments to it; analyze payments to credit card issuers and other merchants; send 37 litigation files to Parr Brown with instructions and explanation (4.4)	Asset Recovery
9/18/2019 WK	0.6	250.00	150.00	Finish review of court docket for Neldon divorce to identify attorneys who represented Neldon, respond to M. Lehr (.2); emails with M. Lehr on suspected ties between Hamblin arbitration demand and \$25,000 sent by Robert Johnson (.1); search NSDP invoices for references to Wisdom Farms and ICSID (.3).	Investigation
9/18/2019 WK	1.4	250.00	350.00	Call with DOJ (1.0); notes of call (.4).	Litigation
9/17/2019 WK	4.0	250.00	1,000.00	Search files, scan and send additional documents to attorneys for Robert Johnson showing fraud by Neldon (.2); respond to M. Woolley on setting up call; call with Sandra Virkus, notes of call, send hardship affidavit (.4); read email from M. Lehr to P. Moxley (.1); review Hamblin file, send comprehensive summary of complicated history of transactions to Parr Brown; find additional documents; discuss with Lone Peak new spreadsheet showing payments to commission recipients; analyze stock transfers to Hamblin, send litigation request (2.0); send updated commission payment spreadsheets to M. Lehr with explanations (.4); call with P. Moxley on his meeting with Robert Johnson; notes of call (.4); send litigation requests to Parr Brown for three additional commission recipients (.5).	Asset Recovery

9/17/2019 WK	2.0	250.00	500.00	List matters to discuss with DOJ; discuss with Lone Peak what analysis to do of Citibank credit cards (.8); research ICSID and ability to sue affiliates of World Bank (.6); discuss with Lone Peak credit card analysis; review draft summary (.1); begin review of court docket for Neldon divorce; identify attorneys who worked on divorce (.2); review draft credit card analysis showing month-by-month totals; make notes of changes to make (.3).	Investigation
9/17/2019 WK	0.7	250.00	175.00	Emails with M. Lehr on deadlines for responses to pending motions (.3); email Snell & Wilmer on waiving conflict of interest (.4).	Litigation
9/16/2019 WK	5.3	250.00	1,325.00	Draft and send settlement agreement for Peter Gregg; update tracking logs; read new financial information for Hinton Battle, prepare and send settlement agreement (.9); receive and deposit funds from Pri-Med; update litigation and settlement logs (.1); gather documents and send litigation requests with explanations (1.3); prepare tolling agreement for Gleaves Swearingen; call with J. Balls on including securities allegations in complaints; send proposed tolling agreement to M. Woolley (1.0); gather documents and send to Parr Brown for litigation on Jameson (.7); Plaskolite (.4); Gary Peterson (.5); respond to M. Lehr with documents and suggestions for Johnson attorneys in meeting with R. Johnson (.4).	Asset Recovery
9/16/2019 WK	2.4	250.00	600.00	Review Boyack invoices and email from Weston Boyack; research dates of key events, send to Boyack (1.1); emails with Capital One on when documents will be delivered (.1); review sources of payments to Heideman (.2); read information from Wisdom Farms on work performed and responses to Receiver questions, send to DOJ with comments (1.0).	Investigation
9/16/2019 WK	0.1	250.00	25.00	Receive CD from Citibank with credit card information; send payment of invoice; give directions to Lone Peak for analysis.	Financial analysis
9/14/2019 WK	2.2	250.00	550.00	Finish review of Findings/Conclusions, add securities allegations to template complaint for commission recipients.	Litigation
9/13/2019 WK	0.3	250.00	75.00	Call with T. Belchak on properties included in upcoming auction; research location of properties, give information on property characteristics.	Asset Disposition
9/13/2019 WK	1.7	250.00	425.00	Read response from Christopher Taylor (.1); discuss with Lone Peak analyst progress in his analysis of stock transferred to NSDP, net proceeds to NSDP (1.0); discuss with C. Gomez payments to Duane Parker; request research of payments to affiliates of commission recipients (.2); gather information on litigation recommendations (Brennan and Hamilton) (.4).	Asset Recovery

9/13/2019 WK	4.1	250.00	1,025.00	Analyze types of complaints to file, make list of issues to discuss with M. Lehr (.7); revise draft complaint on Frandsen & Hutchings, create redline, send to J. Balls (.3); create agenda for planning meeting; review template complaint for commission recipients; planning meeting with Parr Brown attorneys (1.4); meet with attorneys for Robert Johnson (1.3); review findings of fact/conclusions; begin revising complaint to add securities allegations (.4).	Litigation
9/12/2019 WK	0.4	250.00	100.00	Get notice of corporate revocation in Iowa; update Utah Corporations Division information on RaPower, pay renewal fee.	Case Administration
9/12/2019 WK	2.4	250.00	600.00	Review changes to Hale & Wood tolling agreement, sign and send (.1); read counteroffer by Snell & Wilmer, research files; prepare draft response; prepare draft settlement agreement (.7); call with attorney for Brittain family; send copies of orders, grant additional time; notes of call (.4); read comments by M. Lehr on Snell & Wilmer response; revise and send (.2); read letter from attorney for Rowbotham; prepare and send tolling agreement (.4); review Gregg hardship affidavit; research value of home; respond with settlement offer (.6).	Asset Recovery
9/12/2019 WK	0.5	250.00	125.00	Review bank statements for Glenda's accounts to confirm funds still frozen, respond; sign revised closing agreement for HD 4654, send (.1); read order from Utah Labor Commission on claim against Cobblestone; respond to D. Snuffer and M. Lehr (.1); read letter and exhibits from International Commerce Development Center, revise target list (.3).	Investigation
9/12/2019 WK	1.0	250.00	250.00	Send comments to DOJ on Glenda, Randale, and LaGrand opposition to motion for additional sanctions (.7); read appeal brief by RaPower, Black Night and others; make notes of issues to discuss in reply (.4).	Litigation
9/11/2019 WK	0.1	250.00	25.00	Emails with Millard County Assessor on recommending changes to tower site assessed valuation, respond; receive net closing sale proceeds for 4654 and 4657.	Asset Disposition



9/11/2019 WK	4.4	250.00	1,100.00	Respond to letter from L. Snow on M. Amidan; find and send documents relating to payments (.3); call with P. Moxley on Robert Johnson; emails with M. Lehr on meeting (.2); receive and deposit settlement funds; get signed settlement agreements; update litigation and settlement logs; send confirming letter to Orth; revise motion to approve settlements; review changes to motion by M. Lehr, send comments (1.3); revise demand letter to B. Sorenson, send (.4); respond to M. Skolnick on extending time for response (.1); call with M. James on Hale & Wood, send tolling agreement; notes of call (.2); review Boyack file, send lengthy response to facts and legal analysis (1.9).	Asset Recovery
9/11/2019 WK	0.2	250.00	50.00	Review documents from CSE Insurance; revise target list; respond to CSE.	Investigation
9/11/2019 WK	1.1	250.00	275.00	Review Receiver's filed motion to dismiss counterclaims by LaGrand, Randale, M. Shepard (.1); call with DOJ; send revised motion for approval of settlements (.6); read opposition memo by Glenda, Randale, LaGrand to DOJ motion for additional contempt sanctions (.4).	Litigation
9/10/2019 WK	0.1	250.00	25.00	Read email from M. Amidan, review signed tolling agreement; revise target list.	Asset Recovery
9/10/2019 WK	0.7	250.00	175.00	Read M. Lehr response on dismissal of fiduciary claims; read order; email M. Lehr on effect of litigation stay (.4); read response by M. Skolnick on tolling agreement for NSDP; respond with proposal for shorter tolling period (.3).	Litigation
9/9/2019 WK	0.3	250.00	75.00	Update motion to approve settlement, send to M. Lehr for review.	Case Administration
9/9/2019 WK	1.7	250.00	425.00	Prepare tolling agreements for Hawes, Snell & Wilmer, Hale & Wood; send to law firms (including Heideman, Reay, NSDP (.7); work drafting demand letter to Cloward & Sorenson (1.0).	Asset Recovery
9/9/2019 WK	2.7	250.00	675.00	Prepare strategic plan for litigation, send to M. Lehr with comments (2.1); review Receiver draft motion to dismiss counterclaims by LaGrand; create redline; send to M. Lehr with comments (.6).	Litigation
9/7/2019 WK	0.8	250.00	200.00	Read information and exhibits from attorneys for Gregg; make notes for response (.3); read Hinton Battle hardship affidavit, respond with explanation of missing pages (.1); review letter and document from Weston Boyack from his father's law practice (.4).	Asset Recovery

9/6/2019 WK	4.5	250.00	1,125.00	Notes of call with Gleaves Swearingen (.1); compile list of all payment to Heideman and sources; send letter to Gleaves with information on NSDP sources and Heideman sources; send information on case holdings in lawsuits against law firms (1.1); read counter-proposal by Robert Johnson (.8); prepare proposed response to R. Johnson, with list of deficiencies, send to M. Lehr for comments (2.3); read M. Lehr comments, revise response and send to R. Johnson (.2).	Asset Recovery
9/6/2019 WK	0.2	250.00	50.00	Review Cloward and Sorenson marketing letter; review invoices to identify those fees relating to marketing.	Investigation
9/5/2019 WK	0.5	250.00	125.00	Respond to emails from G. Shepard, send additional payment to Shepard (.2); work on property tax appeal for Tower site, finalize and send; call with T. Belchak (.3)	Case Administration
9/5/2019 WK	3.4	250.00	850.00	Respond to Gleaves Swearingen on setting up call; respond to Ayers on his dispute; get tolling agreements for R. Aulds, P. Aulds; update target list (.2); respond to attorney for Howell, Palmore, Mahler with information (.4); call with L. Snow on M. Amidan, send hardship affidavit, notes of call; call with attorney for F. Abdullah, prepare settlement agreement, send (.6); get signed settlement agreement from H. Pionk, send confirmation (.1); respond to attorney for Nevan with hardship affidavit, explanations (.2); respond to Ayers with hardship affidavit (.1); gather information, begin compiling list for strategic planning for filing lawsuits (.2); call with attorneys at Gleaves Swearingen (.5); research history of payments to Gleaves Swearingen, legal analysis and other cases against attorneys, sources of funds paid to Gleaves (.5); review Gleaves invoices, compile list of payments from Heideman and NSDP (.6).	Asset Recovery
9/5/2019 WK	0.5	250.00	125.00	Get filed complaints on Ina Newman, Glenda Johnson; update litigation log; notify DOJ (.3); call with M. James on additional time; send email granting more time for response (.2).	Litigation
9/4/2019 WK	0.6	250.00	150.00	Prepare tolling agreement for Robert Aulds, Patricia Aulds, send with comments (.4); revise settlement agreement for Blackburn, send with comments (.2).	Asset Recovery
9/4/2019 WK	4.4	250.00	1,100.00	Analysis of files, finish letter to D. Snuffer requesting information; send.	Investigation
9/4/2019 WK	2.6	250.00	650.00	Read Ed Wall email on vehicles titled in Neldon's name; read Neldon response to motion for additional sanctions, send comments to DOJ and M. Lehr (1.1); call with E. Healy Gallagher; notes of call; emails and call with M. Lehr.	Litigation

9/3/2019 WK	0.9	250.00	225.00	Email to Stacy Snow on inadequacy of response (.1); call with M. Woolley, notes of call [wrong Woolley] (.2); get signed tolling agreement for Lawyer, Brumfield, respond; revise target list (.2); read correspondence from Hale and Wood (.4).	Asset Recovery
9/3/2019 WK	1.7	250.00	425.00	Review documents from Intermountain Health on insurance policies, respond; update target log (1.0); review new investigative information on attorney Matthew Woolley, research PACER; send letter requesting information (.5); begin letter to D. Snuffer requesting information (.20)	Investigation
9/3/2019 WK	0.2	250.00	50.00	Reconcile bank statements; send monthly living allowance to G. Shepard.	Financial analysis
9/3/2019 WK	0.8	250.00	200.00	Review redline of motion to reappoint receiver; send comments to DOJ on NSDP request for additional time to respond to motion for additional sanctions.	Litigation
9/2/2019 WK	0.9	250.00	225.00	Research nature and patterns of payments to Minnon, prepare and send proposed settlement agreement (.3); review Blackburn hardship affidavit; research home value; prepare and send proposed settlement agreement (.6).	Asset Recovery
9/2/2019 WK	3.9	250.00	975.00	Read report by Wisdom Farms submitted with opposition to motion to cancel shares; draft demand letter to cease using technology and requesting information (1.9); call with Greg Newell (ICDC); notes of call (.4); call with Zane Crafts on Neldon actions regarding trailer, notes (.3); review exhibits to NSDP letter of 8/12/19 on XSun and Solco; research commission payments identified as being paid by XSun (1.3).	Investigation
9/2/2019 WK	2.5	250.00	625.00	Review comments by M. Lehr on complaint to file against Glenda; send request to Lone Peak for research (.1); prepare draft motion to reappoint receiver; edit and revise; send to M. Lehr with comments (2.4).	Litigation
8/31/2019 WK	0.1	250.00	25.00	Read response from Stacy Snow to demand; respond to inquiry from Gleaves Swearingen.	Asset Recovery
8/30/2019 WK	0.2	250.00	50.00	Send information on new properties to potential bidders and county assessor.	Asset Disposition
8/30/2019 WK	1.9	250.00	475.00	Deposit and log receipt of settlement payments, send confirmations; revise motion for approval of settlements (.6); read background information on role of Bill Pack; read letter from B. Ray; draft settlement agreement; response with options for hardship affidavit (.6); read response from Coombs on services he provided; send demand to Brittain beneficiaries (.5); call with attorney for C. Young; send information (.2).	Asset Recovery

8/30/2019 WK	0.7	250.00	175.00	Call with S. Peterson on payments to him from IAS, notes of call; revisions to target list (.2); read email and documents from Coates, respond (.1); read DOJ-supplied marketing letter and trial transcript on Cloward & Sorenson (.1); discuss with C. Gomez contents of NSDP production (.3).	Investigation
8/30/2019 WK	3.0	250.00	750.00	Read revised turnover motion for Glenda; research sources of deposits to Glenda account #6804 for turnover motion; research document sources (.8); discuss turnover motion with C. Gomez, send information on sources of documents to M. Lehr (.2) prepare for meeting with R. Johnson; meeting with R. Johnson; discussions with S. Humphrey (2.0).	Litigation
8/29/2019 WK	1.5	250.00	375.00	Read email, letter from Millard County assessor on greenbelt rollback, respond (.2); read and sign closing documents for HD 4657; calculate proportion of greenbelt rollback (.3); read, sign closing documents for sale of HD 5654 (.3); prepare notice of sale results for 80-acre (4657) and 40-acre (4654) parcels (.7).	Asset Disposition
8/29/2019 WK	1.0	250.00	250.00	Call with H. Pionk on settlement; notes of call; call with target claiming entitlement to refund (.3); read response by attorney for M. Amidan; draft and send response with copies of key documents (.7).	Case Administration
8/29/2019 WK	1.4	250.00	350.00	Research transactions with Hamilton and stock transfers; respond to E. Healy-Gallagher (.2); review additional information from S. King, update logs; correspond with other targets (.3); investigate Bart Walker, Cindy Walker addresses; draft and send new demand letters; send letter to T. Brown (.7); emails with M. Lehr on how to make demand on deceased couple's estate (.2).	Investigation
8/29/2019 WK	0.1	250.00	25.00	Discuss NSDP stock analysis with LPV; explain objectives and the types of information needed.	Financial analysis
8/29/2019 WK	3.3	250.00	825.00	Review and scan DMV records, send to E. Wall with explanation of vehicle information; request information from N. Johnson (.6); send information on Glenda Johnson vehicles to S. Paul discuss contempt; call with M. Lehr (.7); call with M. Lehr on his discussions with D. Snuffer on Glenda lien, counterclaims, and unpaid contempt fees (.3); read DOJ comments on draft turnover motion against Glenda, send comments to M. Lehr (.1); read draft complaint against Glenda; create redline, send to M. Lehr with comments (1.3); read draft complaint on Ina Newman, create redline; send to Par Brown with approval to file (.3).	Litigation
8/28/2019 WK	0.2	250.00	50.00	Read inquiry from title company on closing of Delta properties, respond with information and copies of court orders (.1); call with listing broker on 5 year recapture of greenbelt waiver for 80-acre parcel (.1).	Asset Disposition

8/28/2019 WK	2.5	250.00	625.00	Sign tolling agreement for M. Sikich, send; re-send returned mail to new addresses; request address help from DOJ (.6); receive settlement payment from S. Pionk, send confirmation (.1); work of list of lawsuits to file; identify where jurisdiction is needed; read information from Lewis (1.8).	Asset Recovery
8/28/2019 WK	0.5	250.00	125.00	Call with S. King, read summary of reasons for payments to him; respond (.2); review information on role of W.E. Hamilton in obtaining IAS loan (.3).	Investigation
8/28/2019 WK	4.0	250.00	1,000.00	Call with DOJ (1.0); find and send to DOJ copies of lawsuits in other cases against credit card issuers, send information on fiduciary duties of personal representatives of estates (.4); email DOJ and M. Lehr on targets and getting jurisdiction; seek guidance from DOJ (.4); read draft motion for turnover of Glenda real estate and monies; create redline; send to M. Lehr with comments (2.2).	Litigation
8/27/2019 WK	1.4	250.00	350.00	Review comments by M. Lehr on plans for meeting with M. Skolnick; revise outline (.7); call with commission recipient J. McGan; notes of call (.2); work on list of lawsuits to file, which judicial districts require notice (.5).	Asset Recovery
8/27/2019 WK	1.6	250.00	400.00	Work compiling and analyzing DMV list of vehicles (.8); call with Citibank on credit card statements; notes of call (.1); get tolling agreement from Church; emails with attorneys for Church on timetable; update target logs; research IP valuation firms (.2); research nexus between Cobblestone and RaPower payments and vehicles titled in name of Glenda Johnson; send summary to DOJ (.4); read information from Sierra Engineering on reasons for payments to it; respond; update target list (.1).	Investigation
8/27/2019 WK	2.1	250.00	525.00	Meet with M. Skolnick on legal claims against NSDP; discussions with M. Lehr (1.6); call with E. Healy-Gallagher on Snell & Wilmer funds in court registry; status of negotiations (.2); read M. Lehr summary of call with D. Snuffer on counterclaims and lien by Glenda Johnson (.3).	Litigation
8/26/2019 WK	0.1	250.00	25.00	Read new information from G. Shepard on BFS payments not being made; respond.	Case Administration
8/26/2019 WK	3.0	250.00	750.00	Call with P. Moxley on Robert Johnson (.2); notes of call (.2); receive, log settlement funds from Tiffin Foundation (.1); prepare, send tolling agreements to Church, K. Lawyer; read letter from T. Brumfield, send tolling agreement and explanatory letter (.8); respond to Snell & Wilmer on settlement position (.5); review demand letters, compile list of non-Utah cities where targets live, to identify districts where notices should be filed (1.2).	Investigation

8/26/2019 WK	3.3	250.00	825.00	Gather documents showing source of XSun funds; prepare for meeting with Michael Skolnick (1.6); call with Adhesive Technologies on unpaid invoices, notes of call; review invoices, send email (.3); read response from Henke on engineering; review information on vehicle sale by Sahara Motors in Glenda name; read information from Merrick Maxfield on payments to Urban Gorilla; read information from Eugene Mallotte; revise target list (.4); email M. Lehr to request subpoena to title company; review information from GM Financial on vehicle lease, send payment for subpoena production (.5); begin review of DMV documents; create spreadsheet with list of vehicles and owners (.5).	Investigation
8/26/2019 WK	0.2	250.00	50.00	Discuss with Lone Peak results of search on mortgage payments by G. Shepard; scan and send list of payments to M. Lehr.	Financial analysis
8/26/2019 WK	1.5	250.00	375.00	Call with T. Belchak (second call) on strategy for removal of lien filed by Glenda on property (.1); begin drafting motion for approval of settlement agreements (1.4).	Litigation
8/24/2019 WK	0.5	250.00	125.00	Read questions by P. Johnson on statute of limitations for Boyack; conduct legal research; prepare and send summary of legal authority; finish settlement agreement for Boyack.	Asset Recovery
8/24/2019 WK	0.8	250.00	200.00	Finish reading information from Nelson Snuffer on stock sales.	Investigation
8/23/2019 WK	0.4	250.00	100.00	Call with buyer of trailer on Neldon Johnson claims for contents of utility trailer; notes of call.	Case Administration
8/23/2019 WK	2.4	250.00	600.00	Read and create redline of replacement demand letter to Hale & Wood, send to M. Lehr with comments (.5); receive, deposit settlement funds from Gilmore, send confirmation; log in settlement tracking; revise target list (.3); read Parr Brown changes to Hale & Wood letter, revise, sign and send letter; send comments to M. Lehr on strategy (.3); email DOJ on Brittain, send copies of documents, explain issues, request guidance (.5); read response from Roger Hamblin and Chase Hamblin (.1); write P. Moxley on Boyack; draft tolling agreement and begin settlement agreement for Boyack (.7).	Asset Recovery
8/23/2019 WK	1.4	250.00	350.00	Discuss Nelson Snuffer stock transfer documents with Lone Peak analyst (.2); search files for copies of Shepard trust documents, send to Parr Brown with explanations (1.2).	Investigation
8/23/2019 WK	0.6	250.00	150.00	Call with M. Lehr and J. Ball on suit against Diana Shepard, alternative strategies (.2); emails with M. Lehr on strategy for law firms, rumor of suit against equipment purchaser (.4).	Litigation

8/22/2019 WK	1.0	250.00	250.00	Attend auction to see if other bidders would appear; discussions with broker and county assessor (.9); call with T. Belchak on airplane ownership by Cobblestone, property tax appeal (.1).	Asset Disposition
8/22/2019 WK	3.0	250.00	750.00	Send SSN to Liberty Mutual for their research; revise and resend letters for returned mail (9 letters); analyze new information on deceased commission recipients, send inquiry to M. Lehr (1.3); read response from Snell & Wilmer on Receiver demand (.3); call with attorneys for Tiffin Foundation, notes of call (.4); review changes to Tiffin settlement agreement, sign and send (.1); call with R. Auld on extension of time (.1); read Snell & Wilmer legal analysis, prepare proposed response, send to M. Lehr for review (.8).	Asset Recovery
8/22/2019 WK	0.4	250.00	100.00	Call with F. Nau on reasons for payments to him; notes of call; re-send response to C. Young; revise target list.	Investigation
8/22/2019 WK	0.2	250.00	50.00	Call with T. Belchak on lien filed by Glenda Johnson; property assessment appeal.	Litigation
8/21/2019 WK	1.0	250.00	250.00	Read orders approving new real estate sales (.2); gather details on new property sales, update report log for properties; research map location relative to tower site, notify buyer who had expressed interest; set auction date, send publication notice; notify broker (.8).	Asset Disposition
8/21/2019 WK	4.2	250.00	1,050.00	Respond to targets who had rejected demands (Tilden, Swenson, Stowers, Kahuna, Young, Stewart, Brennan, Pri-Med, Kerr, Orgill, Kulacz (3.0); call with A. Houston and M. Sikich; draft and send tolling agreement (.1); gather information on suits against insiders Taylor and Snow, send explanation and backup documents to M. Lehr with directions on claims to assert; call with G. Amiden; notes of call (1.1).	Asset Recovery
8/21/2019 WK	0.3	250.00	75.00	Call with T. Belchak on lien filed by Glenda Johnson and auction of additional properties.	Investigation
8/21/2019 WK	0.4	250.00	100.00	Receive and log settlement payment; update settlement tracking spreadsheet; send letter confirming receipt of payment.	Financial analysis
8/21/2019 WK	0.6	250.00	150.00	Read lien filed by Glenda Johnson against Tower property, send to DOJ and M. Lehr with comments.	Litigation
8/20/2019 WK	0.5	250.00	125.00	Prepare auction bid sheets for HD 4654, 4657; email with M. Lehr to inquire on receipt of deposit; notify assessor of auction.	Asset Disposition

8/20/2019 WK	3.2	250.00	800.00	Comments to M. Lehr on Neldon granting of quitclaim deeds (.1); emails with S. Black on his rejection of demand, revise target list (.1); get signed tolling agreement for Atwood, respond; read response from P. Gregg; legal research, respond to attorney for Gregg (.7); email M. Skolnick on XSun funds (.2); research, prepare summary of transfers to Glenda for turnover motion; gather and explain exhibits, send to M. Lehr (2.0); call with attorney for John Howell; notes of call (.1).	Asset Recovery
8/20/2019 WK	2.0	250.00	500.00	Gather information on stock sales by Robert Johnson and his relatives, search deposition excerpts from Neldon for description of Robert Johnson transactions, send to P. Moxley with comments. (.7); learn names of other relatives, find and send information on stock ownership (.2); research new addresses for returned mail, resend demand letters (.6); read letter from Cloward & Sorensen and copies of invoices (.2); email DOJ for guidance on strategy against accounting firms (.3).	Investigation
8/20/2019 WK	0.1	250.00	25.00	Review Lone Peak solvency analysis for Glenda during time of real estate purchases.	Financial analysis
8/20/2019 WK	3.8	250.00	950.00	Gather documents in support of request to file suit against commission recipients; search PSTC records for stock ownership; inquiries to Lone Peak on details of payments; search for 1099 tax notices issued by RaPower, send to M. Lehr with request to file suit (2.3); respond to DOJ on inquiries on W. E. Hamilton Black (.3); read answers and counterclaims by LaGrand Johnson, Randale Johnson, Matt Shepard (.4); research receivership order, send comments to M. Lehr on defense to counterclaim (.2); read draft reply on receiver motion to transfer cases to Judge Nuffer; create redline, send to M. Lehr with comments (.6).	Litigation
8/19/2019 WK	0.3	250.00	75.00	Call with M. Johnson (FL) on status of case; notes of call.	Case Administration



8/19/2019 WK	4.1	250.00	1,025.00	Read responses from Anderson, Gaskill, Hamilton; update master target list; respond to Anderson (additional time), Gaskill (matter closed); call with B. Orr, notes; respond to Hamilton (.9); search for bank records for Glenda real estate purchases; discuss with C. Gomez (Lone Peak), assignment to Lone Peak for analysis of R.C. Willey sales (.5); prepare and send receipt for Michael North; read responses from J. Freeborn, Powhatan schools, Blackburn, K. Smith (.3); respond to Aulds and Neven on more time (.2); call with T. Belchak on airplane status, missing equipment (.2); create redline of turnover motion on real estate to add new information from Lone Peak on sources of funds; send summary to M. Lehr with exhibits (1.8); call with H. Pionk on reasons he cannot offset commissions against lens purchases (.2).	Asset Recovery
8/19/2019 WK	1.4	250.00	350.00	Read Lone Peak summary of R.C. Willey furniture purchases; calculate amounts paid by Receivership entities; create summary, send to M. Lehr for use in motion.	Investigation
8/19/2019 WK	0.6	250.00	150.00	Discuss with Lone Peak tracing the \$1.498 million transfer from RaPower to XSun (.5); discuss sources of funds for real estate purchases by Glenda (.1).	Financial analysis
8/19/2019 WK	2.9	250.00	725.00	Prepare for meeting; meet with attorneys for Robert Johnson; discussion of strategy with M. Lehr (2.8); read answer to complaint by S. Bowers; make notes of next steps (.1).	Litigation
8/17/2019 WK	0.3	250.00	75.00	Review request by S. Pionk for additional time; draft settlement agreement.	Asset Recovery
8/17/2019 WK	3.7	250.00	925.00	Review documents from R.C. Willey; begin compiling list of locations where furniture was delivered and type of furniture purchased taken from individual invoices (1.4); add prepare purchases to timeline of events (.3); begin reading Nelson Snuffer 7/10 letter on IAS stock issue and exhibits; draft letter to M. Woolley on reasons for payment (2.0).	Investigation
8/16/2019 WK	0.5	250.00	125.00	Call with T. Belchak on other properties available, expected to be available; theft of airplane avionics, send photos.	Asset Disposition

8/16/2019 WK	5.6	250.00	1,400.00	Find and send documents to M. Lehr for use in meeting with Robert Johnson, comments on strategy (.2); review factual section for real estate turnover motion; review files and gather documents; revise fact section of turnover motion (2.0); call with attorney for Tiffin Foundation (.2); review payments to Tiffin Foundation, create and send settlement agreement (.6); work on real estate analysis of turnover motion (.4); review Glenda records of expenditures, create list of payments by Receivership Entities for real estate expenses (1.4); search deposition transcripts for testimony on source of funds for real estate purchases (.5); revise demand letter to Hale & Wood attorney, send (.3).	Asset Recovery
8/16/2019 WK	0.7	250.00	175.00	Review letter accompanying box of documents from NSDP re: XSun, Solco; research history of XSun bank accounts.	Investigation
8/16/2019 WK	0.1	250.00	25.00	Review affidavits of publication for real estate sales; send payment.	Financial analysis
8/16/2019 WK	0.7	250.00	175.00	Discussion with M. Lehr on strategy for meeting with R. Johnson attorneys (.4); discuss with M. Lehr evidence in support of turnover motion for Glenda Johnson (.2); notes of information to seek in meeting with Robert Johnson attorneys.	Litigation
8/15/2019 WK	0.2	250.00	50.00	Get signed auction procedures by bidder for HD 4654, 4657; notify listing agent.	Asset Disposition
8/15/2019 WK	3.6	250.00	900.00	Review QuickBooks entries to evaluate Glenda real estate purchases, send to M. Lehr with explanation (.3); call with attorney for Lance Neven, notes of call (.3); revise, send letter to Citibank on credit cards (.2); draft request letters to Chase, Discover, Capital One credit cards; update master target log (.8); call with Kevin Styler on purpose of payments, notes (.1); call with Ally Financial, notes; send information to Ally on SSN and tax ID numbers (.4); call with H. Battle (.1), send hardship affidavit, notes of call; emails with attorney for Neven, send fraud summary (.4); call with Utah Division of Motor Vehicles, send payment; notes of call (.3); respond to K. Lawyer on demand for return of commissions (.7).	Asset Recovery
8/15/2019 WK	2.6	250.00	650.00	Review documents from Pacific Stock Transfer; revise redline of requested compliance verification; call with M. Lehr on PSTC strategy; research contents of initial production, send to M. Lehr (.8); review letter to Citibank on credit cards (.1); review of Nelson Snuffer letter dated July 17 (on shares issued to NSDP); review second NSDP letter dated July 17 (.7); call with Gary Peterson, notes of call (.2); begin review NSDP documents re: receiver demand for return of XSun and Solco funds paid to NSDP (.8).	Investigation

8/15/2019 WK	0.2	250.00	50.00	Discuss credit card analysis with C. Gomez at Lone Peak.	Financial analysis
8/15/2019 WK	2.4	250.00	600.00	Read draft DOJ motion for additional sanctions; create redline, send to DOJ with comments (1.6); read NSDP response to third status report, send comments to M. Lehr (.8).	Litigation
8/14/2019 WK	0.3	250.00	75.00	Call with potential buyer for real estate, create log of interested buyers matched with properties; notes of call; send sample auction agreement.	Asset Disposition
8/14/2019 WK	4.8	250.00	1,200.00	Make changes in master litigation list based on responses from targets (.5); get new addresses, send commercial demand letters to new targets (.3); read responses from Woodson, Rowbotham, Atwood, send responses; get copies of checks payable to Woodson; re-send demand letters to new addresses, send check copies to Woodson (1.1); prepare tolling agreement, send with letter to Atwood (.5); review comments from DOJ on letter to Church; revise and send demand letter (1.0); review and send demand letters to Abdullah, Chaston, Roehm (.2); draft settlement agreement for Carranza, send; notes of call (.6); read response from R. Blackburn, prepare response (.6).	Asset Recovery
8/14/2019 WK	1.2	250.00	300.00	Read email from M. Lehr with new information from Pacific Stock Transfer; create redline on compliance affidavit for PSTC, send to M. Lehr with comments (.4); review chart of payments to Citibank; draft demand letters to credit card issuers (.8).	Investigation
8/14/2019 WK	0.6	250.00	150.00	Discuss with Lone Peak payments to Cindy Walker, new addresses needed for returned mail; payments on credit card accounts.	Financial analysis
8/14/2019 WK	1.4	250.00	350.00	Call with DOJ (1.0); notes of call (.4).	Litigation
8/13/2019 WK	1.6	250.00	400.00	Read 7/17/19 letter from NSDP; update spreadsheet showing stock issued to NSDP (.6); call with Birdie Equipment; emails with Orth, Birdie, J. Hafen on demand letters; emails with LPV on missing addresses (.4); respond to M. Lehr on inquiry on draft complaint against Glenda (.2); call with T. Coombs on wrong address; review Glenda bank statement for Folks account, send copy of Hale & Wood demand letter to M. Lehr (.2); read, respond to emails from Sikich, Becker (.2).	Asset Recovery
8/13/2019 WK	0.2	250.00	50.00	Calls with C. Gomez on new commission payments found in QuickBooks; information on Rowbotham control of MJM.	Financial analysis

8/12/2019 WK	3.1	250.00	775.00	Review response from Elwin Johnson; get check from M. Jordan, send confirming receipt; create log of settlements (.4); call with H. Pionk (.2); draft and send letter to Elwin Johnson responding to his denial; re-send 3 returned letters; send request to DOJ to find addresses (.4); draft settlement agreement for H. Pionk (.3); notes of calls with Pionk, North; call with Powhatan athletic director, notes (.5); call from Bill Coates, notes of call; revise target list; send information to Powhatan schools (.6); read letter from Jameson, send hardship affidavit; call from H. Pionk, K. Mower (.3); respond to S. Pionk on repayment option; notes of call with Mower, reply to Mower (.4).	Asset Recovery
8/12/2019 WK	1.7	250.00	425.00	Finish and send letter to DMV (.6); call with Stone Diesel, notes of call (.1); review credit card information from Lone Peak, revise chart of credit card issuers; email DOJ on plans (1.1).	Investigation
8/12/2019 WK	0.4	250.00	100.00	Discuss credit card analysis with C. Gomez at Lone Peak.	Financial analysis
8/12/2019 WK	1.6	250.00	400.00	Discuss with Lone Peak revised list of payments to Glenda; create redline of Glenda complaint with updated information; research new address for Urban Gorilla, re-send letter (.9); create redline of Glenda complaint, send to M. Lehr with comments (.7)	Litigation
8/10/2019 WK	0.2	250.00	50.00	Notes of call with M. Carranza.	Asset Recovery
8/10/2019 WK	0.4	250.00	100.00	Read Shepard equipment lease agreements, independent representative agreement, equipment sublease agreement.	Investigation
8/9/2019 WK	0.9	250.00	225.00	Read email from A. Salzman on closing of San Bernardino land, Los Angeles condo; respond.	Asset Disposition
8/9/2019 WK	3.9	250.00	975.00	Call with commission recipient Woodson, send copies of fraud summary, notes of call (.5); call with Mark Carranza on demand, send copies of hardship affidavit, FFCL (.4); call with attorney for Gilmore, prepare summary of fraud, prepare settlement agreement, send with explanation (1.1); call with attorney for Rowbotham on additional time, notes of call; send text to Michigan lens purchaser (.2); review draft demand letter to Lewis (.2); review, sign and send inquiry letters to 17 recipients (.5); review counteroffer by Gilmore, respond (.2); draft demand letter to Gleaves law firm (.8).	Asset Recovery
8/9/2019 WK	1.5	250.00	375.00	Read reply from Morris Benton; research payments to him, respond (.4); begin drafting letter to DMV (.2); call with Bernard Ray (.1); notes of call with Ray, Gary Peterson; email DOJ on Peterson (.8).	Investigation

8/9/2019 WK	0.6	250.00	150.00	Respond to M. Lehr on how to respond to Objection to cases being assigned to Judge Nuffer.	Litigation
8/8/2019 WK	0.1	250.00	25.00	Call with California title company on final settlement statement, respond; log payment in bank statement.	Asset Disposition
8/8/2019 WK	0.1	250.00	25.00	Review files on Gilmore, call with Gilmore attorney.	Asset Recovery
8/8/2019 WK	3.5	250.00	875.00	Give instructions to Lone Peak on further credit card analysis; revise master target list to determine the types of letters to send, which recipients to omit; send list to DOJ with comments (1.3); review, sign and send merchant inquiry letters (.6); review, revise inquiry letters to individuals; review changes to credit card summary (.8); extended call with Gary Peterson, send copies of court orders (.8).	Investigation
8/8/2019 WK	3.4	250.00	850.00	Read new draft complaint on Glenda; work revising exhibit showing Glenda's transactions (.7); review files and Hale and Wood; meet with attorneys for Hale & Wood (1.7); revise chart of payments to Glenda (.7); read opposition to Receiver motion to transfer new cases to Judge Nuffer (.3).	Litigation
8/7/2019 WK	0.3	250.00	75.00	Research appraisers in Texas, send request for proposals to 8 appraisers, asking for bids.	Asset Disposition
8/7/2019 WK	0.1	250.00	25.00	Call with commission recipient on settlement agreement.	Asset Recovery
8/7/2019 WK	3.8	250.00	950.00	Review, sign and send inquiry letters to vehicle dealers (.5) review, sign and send letters to insurance companies, vehicle dealers (1.3); review details of payments to "other" recipients, decide which ones to send request letters and which to abandon (.4); review credit card account record to identify owner of accounts (.2); review response from Gleaves Swearingham law firm and invoices (.5); review sample credit card analysis identifying personal v. business expenses (.9).	Investigation
8/7/2019 WK	3.4	250.00	850.00	Review Neldon list of all payments greater than \$1,000; list matters to discuss with DOJ; evaluate and list continued compliance failures by Neldon Johnson (2.2); call with DOJ to discuss compliance verification (1.2).	Litigation
8/6/2019 WK	0.2	250.00	50.00	Call with T. Belchak on property closing; email broker and title company on signing documents; get filed notice of property sale results.	Asset Disposition
8/6/2019 WK	4.3	250.00	1,075.00	Finalize and send letters to three targets; revise master target list (.6); discuss with C. Gomez (Lone Peak) on proving tracing of transactions and Glenda solvency analysis; revise letter to Church and analytical report (3.7).	Asset Recovery

8/6/2019 WK	2.1	250.00	525.00	Read corporate documents from Exhibit J of Neldon compliance declaration (.3); make notes of matters to discuss with DOJ; review new documents produced by Neldon Johnson; read index of boxes of documents as NSDP (1.8).	Investigation
8/6/2019 WK	2.9	250.00	725.00	Get Excel version of LaGrand and Randale transactions from Lone Peak, send to S. Paul with explanation (.2); read Neldon Johnson declaration, make list of documents delivered; revise timeline; research other litigation referenced in declaration. (2.7).	Litigation
8/5/2019 WK	2.0	250.00	500.00	Research property records, prepare notice of results of sale of Tower site; search pictures from appraisal for evidence of pipe on the property that has been taken; revise property sale log (1.7); get filed motion for sale of HD 4612, send to broker, send for web posting (.3).	Asset Disposition
8/5/2019 WK	1.4	250.00	350.00	Analyze payments to Cloward & Sorenson, draft letter requesting copies of invoices (.5); analyze payments to recipients in "other" category in master target list, send inquiry letters to B. Pak, International Commerce Dev., Jason Clement, Walter Kerr (.9)	Investigation
8/5/2019 WK	3.7	250.00	925.00	Get updated schedule of commissions paid to Neven, review payments to Vacasa; draft template letters to vehicle lessors, insurance companies and brokers, and merchants (1.0); call with Mark James on meeting re: Hale & Wood, email M. Lehr (.2); explain to Lone Peak analyst changes needed to exhibits showing payments to Church (.6); review revised exhibits, draft cover letter for demand to Church, review additional contents of investigative file on Church contributions (1.9).	Asset Recovery
8/3/2019 WK	5.1	250.00	1,275.00	Work on analysis of Church contributions and summary of fraud findings.	Asset Recovery
8/2/2019 WK	2.3	250.00	575.00	Review draft motion to sell HD461, send to DOJ for approval; create redlines of motion, order, and auction procedures, send to M. Lehr (.9); review, sign closing documents for San Bernardino property; call title company and read title report; send copies of court orders, send letter with explanations (1.3).	Asset Disposition
8/2/2019 WK	1.9	250.00	475.00	Revise new demand letters to commission recipients, create exhibits, send demand letters to Luke and Shepherd; update status log (.8); draft demand letter to Hawes for expert work (.8); read response from Hawes, send reply (.1); revise and send additional commission letters (.2)	Asset Recovery
8/2/2019 WK	0.8	250.00	200.00	Discuss with C. Gomez at Lone Peak how to organize master target list.	Investigation
8/1/2019 WK	0.6	250.00	150.00	Read, respond to Terry Dennis on case status, send report, information on new cases filed.	Case Administration

8/1/2019 WK	1.2	250.00	300.00	Get payee information to return Tower site bid deposits; review and sign closing statement for Tower site, escrow agreement, tax proration agreement (.5); get wire instructions, sign and send receiver deed (.1); send information on upcoming auction to potential bidders; get filed motion for HD 4609, send for web posting (.6).	Asset Disposition
8/1/2019 WK	1.1	250.00	275.00	Review master target list, change categories; decide which recipients to investigate; identify new commission recipients.	Investigation
8/1/2019 WK	3.4	250.00	850.00	Research prior transactions, revise letter to Jacqueline Freeborn, send letter (.8); research, draft and send letters to Plaskolite and RC Willey (1.6); draft demand letters to six recipients (.7); begin drafting template letters for automobile companies (.3).	Asset Recovery
8/1/2019 WK	0.6	250.00	150.00	Send living allowance payment to G. Shepard, update financial logs (.1); record deposits from PSTC, send refunds of property bid deposits (.4); discuss with Lone Peak results of sorting master target list (.1).	Financial analysis
8/1/2019 WK	0.1	250.00	25.00	Read appeal court denial of rehearing; read motion to transfer new lawsuits to Judge Nuffer.	Litigation
7/31/2019 WK	1.2	250.00	300.00	Complete form to transfer Mooney registration to T. Belchak, send to FAA (.1); read draft receiver deed for Tower site, create redline; send to title company with instructions and information (.8); read new draft receiver's deed, respond to title company (.2); send inquiries to unsuccessful Tower site bidders to get addresses, inquire about refunding bid deposits (.1).	Asset Disposition
7/31/2019 WK	1.6	250.00	400.00	Call with P. Moxley on demand to Wally Boyack (.2); call with M. Lowe on propane tank at tower site (.1); compile list of potential property buyers; research Boyack stock sales; search for Boyack invoices, send to P. Moxley with comments (1.3).	Investigation
7/31/2019 WK	1.7	250.00	425.00	Work on analysis of Church contributions and summary of fraud findings.	Asset Recovery
7/31/2019 WK	2.5	250.00	625.00	Lengthy call with DOJ (1.5); find data for commissions paid to Jacqueline, send sample letter to DOJ (.2); notes of call (.8).	Litigation
7/30/2019 WK	3.0	250.00	750.00	Review, sign additional documents on sale of HD 4612; send documents to title company for closing on Tower site, explain assessments; email broker explaining calculation of commissions (.4); call with T. Belchak on airplanes, Tower site purchase; notes of call; prepare aircraft bills of sale (.7); meet with T. Belchak; receive funds for purchase of real property and aircraft; deliver log books and bills of sale; discuss other real properties with potential interest; create receipt for payments (1.9).	Asset Disposition

7/30/2019 WK	1.5	250.00	375.00	Research addresses for commission recipients; review draft letters, respond to questions by J. Shupe (1.3); research Tiffin Foundation, review Form 990 filing (.2)	Investigation
7/30/2019 WK	3.2	250.00	800.00	Work on analysis of Church contributions and summary of fraud findings.	Asset Recovery
7/30/2019 WK	2.5	250.00	625.00	Meet with M. Lehr to discuss litigation planning (1.4); call with K. Conyers on Neldon Johnson compliance, notes of call (.3); emails with Mark James on status of response, send additional explanations (.3); call with Ed Wall (.1); notes of call; notes of meeting with T. Belchak (.4).	Litigation
7/29/2019 WK	2.6	250.00	650.00	Read, sign acceptance of offer for Delta land HD 4612; review appraisal; call with potential buyer on aircraft (.7); create table of property sales and releases to include with status reports (.4); call with tenant of property held in name of Glenda, options to potentially purchase property (.4); review draft motion for sale of H 4609 and proposed order; create redline of drafts, send to M. Lehr with approval to file (.4); read responses from Texas listing agent, read and sign listing agreement, notify other potential agent (.7).	Asset Disposition
7/29/2019 WK	1.3	250.00	325.00	Finalize and send information to SEC on avoidance of Rule 144 holding periods; finalize and send demand to Jameson (.3); work on analysis of Church contributions (1.0).	Asset Recovery
7/29/2019 WK	3.2	250.00	800.00	Read information from lessee of Texas property on easement, respond with questions; read response from Burgener/Holt to Receiver's demand; compare Holt invoices against payments, note discrepancies (.8); research addresses for commission recipients; add commission recipients to target list (2.4).	Investigation
7/29/2019 WK	0.3	250.00	75.00	Download complaints filed against Bower, Matt Shepard, Randale and LaGrand; send to DOJ with comments; update target status list.	Litigation
7/27/2019 WK	0.1	250.00	25.00	Respond to Millard County Assessor on valuation of tower site, the need to file an appeal of the valuation.	Asset Disposition
7/27/2019 WK	0.4	250.00	100.00	Begin summary for SEC on suspicions of stock parking, efforts to avoid Rule 144 holding periods; read comments from M. Lehr on strategy to deal with reaction to contempt order, discuss how to assess condition of assets.	Investigation
7/27/2019 WK	1.7	250.00	425.00	Work on report of Church contributions.	Asset Recovery
7/26/2019 WK	3.4	250.00	850.00	Gather information on company owned by C. Taylor (.1); finish letter to C. Taylor and exhibits (1.0); draft letter to S. Snow (.7); discuss NSDP stock transfers with Lone Peak, transfers to NSDP from others, NSDP funds used to buy real estate for Glenda (.9); instructions to Lone Peak on creating master list of targets, how to sort, what analysis to perform (.7).	Investigation



7/26/2019 WK	1.5	250.00	375.00	Review summary of sources of LaGrand income; read letter from Jameson on expert fees; read prior court rulings on experts, prepare response to Jameson.	Asset Recovery
7/26/2019 WK	1.0	250.00	250.00	Read order allowing compliance declaration exhibits to be filed under seal, orders awarding fees for contempt, send comments to DOJ (.7); call with Parr Brown; revise exhibit for Randale Johnson complaint, send; call with M. Lehr on lawsuits, send addresses for defendants (.3).	Litigation
7/25/2019 WK	4.8	250.00	1,200.00	Search boxes for records of Zions bank account #2008 (.2); read letter, receive returns of stock warrant agreements from D. Nelson and D. Snuffer (.2); read letter from Jameson on his expert work (.1); review deposition transcripts, draft letters to Christopher Taylor and Stacy Snow requesting information on transactions (1.1); read news story from Millard County Chronicle (.1); review lists of potential targets, remove recipients not to target (.8); create template for master list of targets (1.3).	Investigation
7/25/2019 WK	2.1	250.00	525.00	Review questions from title company on property closing for Tower Site, respond; list information to seek from buyer (.3); respond to Millard County Assessor on other Glenda-owned properties; recapture of Greenbelt assessment (.4); texts with potential buyer for airplanes, call with T. Belchak on Tower site closing and airplanes; research FAA requirements for sale (.4); call with new buyer on plane, explain status and history (.2); prepare, send bill of sale for trailer sale; prepare bill of sale for equipment at Tower Site (.8)	Asset Disposition
7/25/2019 WK	0.9	250.00	225.00	Review property tax notices for Millard properties, notes changes in valuation from prior years; update property chart; send HD4658 to buyer (.5); letter to Millard Co. Assessor on removal of Howard/Glenda properties from Receivership (.4).	Asset Recovery
7/25/2019 WK	1.1	250.00	275.00	Call with DOJ on redline of Neldon compliance declaration (.5); read Ed Wall motion to file redacted exhibits (.1); call with J. Balls (Parr Brown) on changes to draft complaint and exhibits, instruct Lone Peak on changes; send new exhibits with explanation (.5).	Litigation
7/24/2019 WK	0.7	250.00	175.00	Finish, send email to Texas broker on listing properties (.4); notes of call with potential airplane buyer.	Asset Disposition
7/24/2019 WK	1.6	250.00	400.00	Read email from E. Healy-Gallagher on compliance declaration; review DOJ redline of declaration (showing changes needed); create redline of cover email and declaration; send to DOJ with commentary.	Litigation
7/23/2019 WK	0.2	250.00	50.00	Finalize, send aircraft registration information to FAA; review invoice, send payment to TJ Neff for airplane consulting.	Case Administration

7/23/2019 WK	1.6	250.00	400.00	Read summary proposals from brokers for listing Texas property; read listing agreement; send questions to broker (.6); calls with C. Cook on buying Mooney airplane, send pictures and log book information; call with person giving me update on persons accessing airplanes (1.0).	Asset Disposition
7/23/2019 WK	2.8	250.00	700.00	Meet with Kate Conyers; receive documents; create receipt; make boxes available; extended discussion about Receiver expectations and documents still at Nelson Snuffer (1.7); notes of meeting with K. Conyers, send to DOJ; send list of commission recipients to J. Shupe (1.1).	Investigation
7/23/2019 WK	0.1	250.00	25.00	Respond to P. Moxley on meeting to discuss Robert Johnson.	Asset Recovery
7/23/2019 WK	1.2	250.00	300.00	Preparation for call; call with DOJ on responding to Neldon Johnson compliance verification; notes of call.	Litigation
7/22/2019 WK	1.8	250.00	450.00	Read, respond to inquiry on Sherwood Shores property (.1); Respond to Millard County Assessor on getting notice of future auctions, send copies of motions, orders, & publication notice on 4657, 4654 (.3); Call with TJ Neff re: reasonableness of offers received; notes of call (.3); additional emails with County Assessor (.3); review files to identify potential buyers for plane; call with potential buyers; prepare new FAA registration for Cessna airplane (.8).	Asset Disposition
7/22/2019 WK	0.5	250.00	125.00	Revise, send letter to Denver Snuffer on Robert Johnson transactions (.2); analyze summaries of transactions with Christopher Taylor, Stacy Snow (.3).	Investigation
7/22/2019 WK	1.0	250.00	250.00	Verify amounts in Glenda bank accounts for frozen funds, respond (.1); revise, finalize, and send response to Robert Johnson re: demand (.7); emails with M. Lehr on meeting with R. Johnson; analyze amounts paid to certain other payees (.2).	Asset Recovery
7/22/2019 WK	0.2	250.00	50.00	Discuss with Lone Peak summaries of potential recoveries; give directions on new analysis needed.	Financial analysis
7/22/2019 WK	5.8	250.00	1,450.00	Read draft compliance declaration for Neldon Johnson; compare his list of real property to Receiver list; research patents; list deficiencies in declaration, send to DOJ with comments.	Litigation
7/20/2019 WK	0.4	250.00	100.00	Notes of call with DOJ.	Case Administration
7/20/2019 WK	0.6	250.00	150.00	Notes of Tower auction and site visit; email TJ Neff on airplane offer and options for moving forward.	Asset Disposition
7/20/2019 WK	0.7	250.00	175.00	Begin work on report analyzing Church contributions.	Asset Recovery
7/19/2019 WK	0.4	250.00	100.00	Review stock sale summary by Robert (Lone Peak) for sales by Neldon and NSDP; give directions for further research.	Investigation

7/19/2019 WK	0.7	250.00	175.00	Read litigation documents about harassment claims by Melody Edwards against Cobblestone (.5); search for text format version of deposition transcripts, send to DOJ; send information on M. Edwards harassment claim to M. Lehr to file notice of stay (.2).	Litigation
7/19/2019 WK	2.7	250.00	675.00	Discuss with C. Gomez ways of analyzing sources of Church payments, notes of planned approach (2.2); discuss with Lone Peak research to conduct on potential recoveries (.5).	Asset Recovery
7/19/2019 WK	1.9	250.00	475.00	Notify DOJ, M. Lehr of auction results (.1); scan and send Tower site purchase documents to agent for closing; give closing instructions (.4); upload appraisal to DropBox, send to county appraiser with comments (.2); get orders approving auction of HD 4657, 4654; prepare publication notice; set auction date, send for publication; notify agent; call with buyer on Tower Site closing; send information on HD 4657 and 4654 to potential bidders (1.0); record deposit for sale of trailer; email tower bidders on retention of their deposits (.2).	Asset Disposition
7/18/2019 WK	5.3	250.00	1,325.00	Read emails from bidder Kesler; research files, respond on commissions not to be paid on Tower site auction, closing costs, taxes (.3); meeting with listing agent (.8); conduct auction of tower site; discussions with County Assessor (.8); travel to Delta (.5); meet with T. Belchak on tower site, get purchase agreement signed; discuss plane purchase (.5); visit tower site, inspect equipment; inspect airplanes, take pictures (2.4).	Asset Disposition
7/18/2019 WK	0.3	250.00	75.00	Copy addresses for commission recipients, give instructions to Lone Peak on letters to send (.3).	Asset Recovery
7/18/2019 WK	0.2	250.00	50.00	Make final revisions to status report; sign and send for filing.	Status Report
7/17/2019 WK	0.2	250.00	50.00	Call with C. Gomez on ways to analyze sources of contributions to the Church.	Financial analysis
7/17/2019 WK	1.0	250.00	250.00	Call with DOJ on recoveries, recovery actions planned, proposed complaints.	Litigation
7/17/2019 WK	0.5	250.00	125.00	Review M. Lehr comments on draft status report, create final version with additional changes.	Status Report
7/16/2019 WK	3.8	250.00	950.00	Research payees, draft and send inquiry letters to Holt Ltd.; revise target list; review list of payments to experts; send inquiry to Rick Jameson (1.5); draft and send inquiry letter to Boyack, Gleaves law firms (1.0); review summary of monthly expenditures prepared by Glenda, identify payees to investigate (1.3).	Investigation
7/16/2019 WK	0.1	250.00	25.00	Review files, email S. Paul on Glenda's failure to send copies of monthly bank records.	Litigation

7/16/2019 WK	1.7	250.00	425.00	Read email from Snell & Wilmer, respond; read information from Shepard on MJM Holdings, respond; send inquiry to Shepard on Share Labs (.2); read M. Lehr recommendation on recovering properties from Glenda Nelson; research (.4); call with M. Lehr on strategies for recovering properties, notes of call (1.0).	Asset Recovery
7/16/2019 WK	1.6	250.00	400.00	Get signed auction consent form from K. Kesler; create bid tracking form and form for winning bidder; call court clerk on using court (.6); review and sign offer for 120 acre property (HD 4609) (.2); send email to L. Mathews with signed acceptance for HD 4609, send to M. Lehr to prepare motion (.1); read title report on Tower site (.3); read title reports on 80-acre site and 40-acre site, send comments to M. Lehr (.4).	Asset Disposition
7/15/2019 WK	1.0	250.00	250.00	Call with L. Phillips; notes of call, send summary to M. Lehr and DOJ with comments.	Investigation
7/15/2019 WK	0.1	250.00	25.00	Discuss with Lone Peak contributions to Church, payments to experts.	Financial analysis
7/15/2019 WK	1.7	250.00	425.00	Email with M. James on expected response to demand to Hale & Wood (.2); read draft Bowers complaint, create redline, send to M. Lehr with comments (.2); read M. Lehr comments on alternatives for recovering real properties; read draft complaint on Glenda Johnson; create redline, send to M. Lehr with comments (1.3).	Litigation
7/15/2019 WK	1.1	250.00	275.00	Notes of call with potential buyer of equipment, view pictures of damage to equipment at Tower Site (.2); second call with buyer on other equipment to purchase (.4); review, respond to inquiry by bidder re equipment at Tower Site (.2); call with prospective broker for Texas property, send abstract and property information (.3).	Asset Disposition
7/15/2019 WK	1.2	250.00	300.00	Scan list of commission recipients, send to DOJ with explanation of intent to send demand letters; revise hardship affidavit (.9); read email from D. Snuffer requesting additional time to respond, send to M. Lehr with comments, respond to D. Snuffer (.3).	Asset Recovery
7/13/2019 WK	3.1	250.00	775.00	Analyze transactions with and payments to commission recipients, identify which recipients to make demand on; research information on recipients; draft template letter.	Asset Recovery
7/13/2019 WK	0.2	250.00	50.00	Read appeal docketing statement, other appeal documents.	Litigation
7/12/2019 WK	0.8	250.00	200.00	Research five potential brokers to list Texas land; send request for proposals (.6); emails with M. Lehr on new bidder for Tower site; calls with persons interested in buying equipment; notes of calls (.2).	Asset Disposition

7/12/2019 WK	0.2	250.00	50.00	Review draft summary of N. Johnson sales of stock; give directions to Lone Peak on final version.	Financial analysis
7/12/2019 WK	1.6	250.00	400.00	Read draft DOJ notice on response to compliance verification; create redline; respond to M. Lehr; emails with DOJ (.4); review revised exhibits showing payments to Randale and LaGrand, send to M. Lehr (.2); read draft complaint on Matt Shepard; analyze payments to M. Shepard; create redline, send to M. Lehr with comments (1.0).	Litigation
7/11/2019 WK	1.3	250.00	325.00	Revise status report, send to M. Lehr for filing.	Status Report
7/11/2019 WK	0.6	250.00	150.00	Give directions to C. Gomez at Lone Peak on new spreadsheet showing payments to LaGrand J. and Randale J.; discuss his summary of all payment over \$4,000 to commission recipients.	Financial analysis
7/11/2019 WK	2.7	250.00	675.00	Call with DOJ on status and updates (.9); notes of call (.3); review draft complaint on LaGrand, create redline (1.1); review draft complaint for Randale J., create redline; send drafts with comments (.4).	Litigation
7/10/2019 WK	0.3	250.00	75.00	Discussion with C. Gomez at Lone Peak on all bank records now loaded on network; discuss with Robert at Lone Peak his questions on analysis of Neldon stocks.	Financial analysis
7/9/2019 WK	0.6	250.00	150.00	Respond to FINRA on liquidation of IAS, explain how Court ordered liquidation (.4); read auction consent by buyer, respond to M. Lehr with directions; email bidders about auction (.2)	Asset Disposition
7/9/2019 WK	0.9	250.00	225.00	Read comments from M. Lehr on letter to NSDP demanding return of retainer funds, respond; research Utah bar rules, sign and send revised letter to D. Snuffer.	Asset Recovery
7/9/2019 WK	0.9	250.00	225.00	Discuss with Lone Peak Valuation on stock sale analysis for NSDP (.4); give instructions on researching commissions paid (.2); instruct on analyzing records of Neldon's personal stock sales (.3).	Financial analysis
7/8/2019 WK	0.5	250.00	125.00	Respond to broker on offer for 120 acre parcel; review and pay invoice for airplane inspection, respond to mechanic; respond to listing agent on Glenda properties (.2); read court order canceling IAS shares, send to FINRA requesting trading halt, notify SEC (.3).	Asset Analysis
7/8/2019 WK	3.1	250.00	775.00	Search boxes of IAS documents for commission recipients; create list showing all 1099 recipients; research recipients; email inquiries to G. Shepard and P. Jones.	Investigation
7/8/2019 WK	0.5	250.00	125.00	Discuss with Lone Peak discrepancies in records of stock sales proceeds to NSDP.	Financial analysis
7/8/2019 WK	0.2	250.00	50.00	Revise list of documents signed by Respondents; review contents of DCL16BLT binder; update list.	Litigation

7/8/2019 WK	0.8	250.00	200.00	Read order on affiliates; draft letter to NSDP demanding return of retainer funds; send draft to M. Lehr for comments.	Asset Recovery
7/6/2019 WK	1.0	250.00	250.00	Revise table of documents signed by LaGrand, Randale, Glenda; send to DOJ and M. Lehr with comments.	Litigation
7/6/2019 WK	1.1	250.00	275.00	Review internal financial records of IAS to identify potential recoveries; research identity of payees.	Investigation
7/6/2019 WK	0.1	250.00	25.00	Read letter from Craig Cummings with additional documents showing beneficiary of legal work.	Asset Recovery
7/5/2019 WK	1.8	250.00	450.00	Compile list of documents from NSDP signed by Defendants and respondents (to identify documents in control of contemnors).	Investigation
7/5/2019 WK	0.4	250.00	100.00	Read and sign revised purchase documents for San Bernardino property; emails with buyer.	Asset Disposition
7/5/2019 WK	2.4	250.00	600.00	Review R. Johnson financial transactions, gather exhibits, revise draft letter; send to DOJ and M. Lehr with comments (1.6); read information from D. Snuffer on accepting service of process; send information to him on Yotsuya trust (.2); read comments from M. Lehr on R. Johnson findings and request to D. Snuffer; revise letter to D. Snuffer (.6).	Asset Recovery
7/5/2019 WK	1.1	250.00	275.00	Read draft DOJ response to motion to extend deadline (.8); read email from S. Paul and compliance declarations for Randale, LaGrand, Glenda Johnson (.3).	Litigation
7/4/2019 WK	4.3	250.00	1,075.00	Legal research; review records of transactions with R. Johnson; draft letter to R. Johnson explaining reasons funds need to be returned.	Asset Recovery
7/4/2019 WK	0.5	250.00	125.00	Analyze receivership order terms applicable to attorneys, draft letter to Denver Snuffer requesting information on payments to him by R. Johnson.	Investigation
7/4/2019 WK	0.1	250.00	25.00	Post on website copy of contempt order.	Case Administration

7/3/2019 WK	0.8	250.00	200.00	Read letter from attorney for Robert Johnson on reasons for IAS payments to him (.3); research stock sales to Johnson, search deposition transcripts for discussions of R. Johnson roles (.5).	Asset Recovery
7/3/2019 WK	0.2	250.00	50.00	Discuss with Lone Peak how to search for proof of insolvency for payments we will challenge (.2).	Financial analysis
7/3/2019 WK	0.2	250.00	50.00	Read emails from California buyer, respond with objections to inspection fee, identify closing fees I am willing to accept.	Asset Disposition
7/3/2019 WK	4.1	250.00	1,025.00	Get filed motion for receiver attorney fees on contempt; read NSDP response to Ed Wall request for more time; get filed motions for sale of 2 Millard County properties, send to listing broker (.2); call with E. Healy-Gallagher on responding to developments, case status, and list of litigation targets (1.0); notes of call; read letter from D. Reay rejecting demand for payment, send to DOJ; revise litigation list (1.3); meeting with J. Hafen and M. Lehr on case progress (1.4); read trial transcript excerpts with court ruling on admissibility of experts (.2).	Litigation
7/2/2019 WK	0.2	250.00	50.00	Read letter from D. Snuffer to attorney Holdsworth on lawsuit against Cobblestone; send email to Holdsworth explaining receivership and requesting information.	Investigation
7/2/2019 WK	0.2	250.00	50.00	Read letter from G. Shepard re: title to his home, send to M. Lehr with comments.	Asset Recovery
7/2/2019 WK	0.3	250.00	75.00	Read 10th Circuit mandates dismissing 2 interlocutory appeals by Johnson, respond to M. Lehr (.2); read letter from Heideman, review Receiver's analysis of payments (.1).	Litigation
7/1/2019 WK	1.6	250.00	400.00	Get confirmation from M. Lehr of no other bidders for San Bernardino properties, notify A. Sazman that auction was canceled, can proceed to close (.1); review information from M. Lehr on getting approval from DOJ for sales; notify DOJ of offers (.2); read draft motion to sell 80 acre parcel in Delta (HD4657) and 40 acre (HD4564); compare to language of prior publication notices; create redlines of motions, send to M. Lehr; read marketing updates for Delta properties (.8); review documents for sale of San Bernardino property, identify concerns (.5).	Asset Disposition
7/1/2019 WK	0.3	250.00	75.00	Review Internal financial records of IAS to identify potential recoveries; research identity of payees (.3).	Investigation
7/1/2019 WK	0.1	250.00	25.00	Send living allowance payment to G. Shepard, update financial logs.	Financial analysis

7/1/2019 WK	0.3	250.00	75.00	Read comments from M. Lehr, revise and send letter to Ina Newman demanding return of funds (.2); read response from Larry Hutchings re: money owed to Shepard, send to M. Lehr with directions (.1);	Asset Recovery
7/1/2019 WK	1.1	250.00	275.00	Review draft motion for attorney fees on contempt, M. Lehr declaration, Klein declaration; create redlines; sign Klein declaration, send to M. Lehr; call with M. Lehr (.8); read Ed Wall motion for extension of time; find and sent PSTC information to Wall with explanation (.3).	Litigation
8/31/2015 WK	3.5	250.00	875.00	Draft settlement agreement for Robert Johnson, compile list of elements necessary for any tolling agreement (2.4); prepare tolling agreements for Heideman, D. Reay, Nelson Snuffer; send to M. Lehr with comments (1.1).	Litigation
<b>Totals</b>		<u>442.3</u>	<u>103,948.00</u>		



## **EXHIBIT B-2**



September 30, 2019

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

Invoice: 873680  
Client: 176390  
Matter: 1

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Administration of Receivership Estate**

Professional Services	\$ 19,233.50
Less Courtesy Discount	<u>\$ -1,923.35</u>
Net Professional Services	\$ 17,310.15
Total Costs Advanced	<u>\$ 81.30</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 17,391.45</b>

**PARR BROWN GEE & LOVELESS**

Invoice: 873680  
 RaPower-3 Receivership  
 Administration of Receivership Estate

September 30, 2019  
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**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
7/01/19	MSL	Review letter to counsel for Ina Newman; Communication with potential bidders for tower property; Communication with Wayne Klein re property sale motions and upcoming auctions; Communication with Pacific Stock Transfer Company re compliance with court orders; Finalize attorneys' fees motion; Coordinate filing of attorneys fees motion	4.40	968.00
7/02/19	JOH	Review of various pleadings and related email correspondence	.50	185.00
7/02/19	MSL	Review letter from Diana Shepard to Receiver re demand letter from Receiver; Correspond with Jeff Balls re draft complaints	.40	88.00
7/03/19	JOH	Review email correspondence and pleadings; Prepare for and meet with Receiver re case status and strategy; Meet with Mike Lehr re same	1.20	444.00
7/03/19	JAB	Review motion to amend; Draft opposition to motion to amend	1.20	348.00
7/03/19	MSL	Conference with Jon Hafen and Wayne Klein re status or the receivership and next steps; Prepare for conference with Wayne Klein and Jon Hafen; Locate and send Wayne Klein notice of intent that was served upon Lisa and Blain Phillips	2.20	484.00
7/05/19	MSL	Research re criminal contempt under Rule 42 of the Federal Rules of Criminal Procedure; Review and revise Receiver's draft communications with Robert Johnson and Nelson Snuffer; Communication with Wayne Klein re contempt	3.80	836.00
7/08/19	MSL	Review court order re cancelation IAS shares and over ruling objections to order including affiliates in receivership estate; Review and revise demand letter to Nelson Snuffer; Communication with Wayne Klein re same; Telephone communication with potential bidder for Millard County Solar property	2.10	462.00
7/09/19	JAB	Review correspondence from Wayne Klein	.30	87.00
7/09/19	MSL	Multiple communications with interested bidders for the solar property auction including Kenneth Skeem, Ken Comstock, Kathy Kirk, and Charlie Smith re auction procedures and qualified bidder process; Communication with Wayne Klein re same	2.10	462.00
7/09/19	MSL	Review previous communications with Pacific Stock Transfer; Draft Communication with Ashley Canady of Pacific Stock Transfer re production of documents to the receiver	.60	132.00
7/10/19	MSL	Communication with attorney for Pacific Stock Transfer Company re contempt order	.30	66.00
7/11/19	MSL	Telephone communication with Wayne Klein and Erin Healy Gallagher re declarations of Randale and LaGrand Johnson, litigation, and next steps; Telephone communication with counsel for Pacific Stock Transfer Company re document production under the Court's orders; Review orders and communications re Pacific Stock Transfer Company; Telephone communication with potential qualified bidder on the Millard County Solar Property	3.40	748.00

**PARR BROWN GEE & LOVELESS**

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<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
7/12/19	MSL	Draft notice of intent to respond to declarations of LaGrand, Randale, and Glenda Johnson; Communication with Wayne Klein and Erin Healy Gallagher re notice of intent; Review and revise notice of intent; Coordinate filing notice of intent	1.90	418.00
7/15/19	MSL	Telephone communication with tenant of property owned by Glenda Johnson; Communication with bidder for solar property	.60	132.00
7/16/19	MSL	Review and revise Receiver's third status report	1.90	418.00
7/17/19	MSL	Review and revise third status report; Communication with Wayne Klein re same	.90	198.00
7/18/19	MSL	Revise and finalize third status report; Coordinate filing of status report; Review orders re sale of properties in Millard County; Communication with Wayne Klein re same	1.10	242.00
7/22/19	MSL	Draft and coordinate filing of request to submit for decision; Communication with Wayne Klein re cashier's check from solar property auction	.80	176.00
7/25/19	MSL	Review draft declaration of Neldon Johnson and draft redline by the DOJ; Conference with Erin Healy Gallagher and Wayne Klein re same; Communication with counsel for Pacific stock transfer company re compliance with the Corrected Receivership Order	1.50	330.00
7/29/19	MSL	Draft email communication with counsel for Pacific Stock Transfer re production of documents and declaration verifying production; Review and revise motion for the sale of property owned by IAS; Communication with Wayne Klein re same	2.20	484.00
7/30/19	JOH	Telephone conference with creditor; Correspond by email with Receiver re same	.50	185.00
7/31/19	JOH	Meet with Receiver re case status	.10	37.00
8/01/19	MSL	Draft response and request to Pacific Stock Transfer Company re compliance with Corrected Receivership Order and Order re Pacific Stock Transfer's Civil Contempt; Email communication re receipt of attorneys' fees check	1.10	242.00
8/02/19	SMH	Revise motion to approve sale of HD-4612 and corresponding exhibits based on the receiver's revisions and coordinate filing	.30	64.50
8/02/19	SMH	Draft motion to approve sale of HD-4612, proposed order re the same, and auction procedures	1.90	408.50
8/05/19	JOH	Review pleadings, documents, and related email correspondence	.80	296.00
8/05/19	MSL	Email communication with potential qualified bidders for HD-4654 and HD-4657; Review notice of sale results for the Tower Property and San Bernardino property; Coordinate filing of the notices; Communication with Wayne Klein re declaration of Neldon Johnson	1.50	330.00
8/07/19	JOH	Review email correspondence and various pleadings; Prepare for and participate in call with Mark James re claims against Hale & Wood; Follow up with Receiver re same; Correspond by email with counsel to Hale & Wood	.70	259.00

**PARR BROWN GEE & LOVELESS**

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<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
8/07/19	MSL	Conference with Wayne Klein, Erin Healy Gallagher and Erin Hines re declaration of Neldon Johnson and next steps; Review Neldon Johnson Deposition and exhibits; Communication with counsel for Pacific Stock Transfer Company re document request	2.10	462.00
8/08/19	JOH	Meet with Mike Lehr re case status and strategy; Prepare for and attend meeting with counsel for Hale & Wood	.70	259.00
8/12/19	JOH	Telephone conference with legal counsel to Hale & Wood re potential settlement; Follow up re same	.50	185.00
8/13/19	JOH	Telephone conference with counsel for Hale & Wood re potential settlement; Correspond by email with Receiver re same	.50	185.00
8/14/19	MSL	Review document production from Pacific Stock Transfer Company; Draft email communication to counsel for Pacific Stock Transfer; Communication with Wayne Klein re same; Draft declaration for Pacific Stock Transfer re verification that all documents have been produced	2.40	528.00
8/15/19	JOH	Attend to scope of potential claims against law firm; Correspond by email with Mike Lehr re same	.90	333.00
8/15/19	MSL	Communication with Wayne Klein re declaration of Pacific Stock Transfer Company; Revise declaration of Pacific Stock Transfer; Email communication with counsel for Pacific Stock Transfer; Meet with potential bidder of Millard County properties at auction; Communication with Wayne Klein re meeting with potential bidder; Multiple emails to other potential bidders re auction procedures	2.50	550.00
8/16/19	JOH	Review updated demand letter to Hale & Wood and related email correspondence	.20	74.00
8/17/19	JOH	Call with counsel to Hale & Wood; Correspond by email with Mike Lehr re same; Correspond by email with Receiver re same	.90	333.00
8/19/19	MSL	Draft reply in support of Receiver's motion to transfer cases to Judge Nuffer; Research case law analyzing the District of Utah's local Rule re transfers; Review Nelson Snuffer's opposition to transfer motion	4.60	1,012.00
8/19/19	NM	Communicate with several credit unions and banks re document production and subpoena provision	.50	62.50
8/20/19	MSL	Communication with potential bidders for the August 22nd auction; Communication with Wayne Klein re same	.40	88.00
8/21/19	MSL	Revise and finalize reply in support of motion to transfer cases under DUCivR 83-2(g); Draft request to submit re motion to transfer cases under DUCivR 83-2(g); Draft notice of stay for proceeding involving Cobblestone Centre in front of the Utah Labor Commission; Communication with Utah Labor Commission re same;	3.70	814.00
8/23/19	JOH	Review and revise letter to opposing counsel; Correspond by email with Receiver re same	.40	148.00
8/26/19	JOH	Follow up with Mike Lehr re claims against third party	.20	74.00

**PARR BROWN GEE & LOVELESS**

Invoice: 873680  
 RaPower-3 Receivership  
 Administration of Receivership Estate

September 30, 2019  
 Client: 176390  
 Matter: 1

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
9/03/19	MSL	Review and revise motion for reappointment of receiver including verifying and adding each federal district where the receiver plans to file notices of receivership; Multiple communications with Wayne Klein re same; Communication with Erin Healy Gallagher re same; Communication with counsel for Pacific Stock Transfer re declaration; Review Neldon Johnson's response to USA's motion for additional sanctions; Communication with Wayne Klein re same	6.80	1,496.00
9/05/19	MSL	Communication with potential bidder of HD-4609 and HD-4612 re appraisal of the properties and auction procedures; Review and finalize motion to reappoint receiver; Draft proposed order reappointing receiver; Coordinate filing of same; Send draft proposed order to Judge Nuffer's chambers; Communication with Wayne Klein re Pacific Stock Transfer Company	3.60	792.00
9/10/19	MSL	Research re standard courts use to evaluate settlement agreements in a receivership; Review and revise motion to approve settlement agreements; Communication with Wayne Klein re same	.80	176.00
9/11/19	JOH	Telephone conference with counsel for Hale & Wood re potential settlement; Review email correspondence re same	.40	148.00
9/11/19	MSL	Email communication with Erin Healy Gallagher and Wayne Klein re motion to approve settlement agreements; Draft proposed order for motion to approve settlement agreements	.60	132.00
9/12/19	MSL	Finalize motion to approve settlement agreements and proposed order; Coordinate filing of motion and proposed order	.80	176.00
9/13/19	JOH	Meet with Mike Lehr re case status and strategy; Review email correspondence and related documents	.50	185.00
9/17/19	MSL	Respond to Wayne Klein re outstanding motions in the underlying receivership proceeding; Communication with counsel for Pacific Stock Transfer re declaration; Research 28 USC 754 re reappointment orders and notice re which district where notices will be filed; Communication with Wayne Klein re notices	1.30	286.00
9/19/19	MSL	Telephone communication with potential bidder for upcoming auction of real property in Millard County; Email communication re same	.60	132.00
9/20/19	JOH	Review email correspondence re securities claims; Prepare for and participate in call with Jeff Balls and Mike Lehr re same and re case strategy; Correspond by email with potential defendant in clawback action; Correspond by email with Mike Lehr re same	.70	259.00
9/20/19	MSL	Telephone communication with Wayne Klein re upcoming auction for certain real property in Millard County	.20	44.00
9/23/19	MSL	Review United State's draft reply in support of motion for additional sanctions; Communication with Erin Healy Gallagher re same; Review opposition to motion to transfer related cases; Communication with Wayne Klein re same	.80	176.00
9/25/19	MSL	Communication with Erin Healy Gallagher re reply for motion for additional sanctions	.30	66.00



**PARR BROWN GEE & LOVELESS**

Invoice: 873680  
 RaPower-3 Receivership  
 Administration of Receivership Estate

September 30, 2019  
 Client: 176390  
 Matter: 1

Date	Tkpr	Description	Hours	Amount
9/26/19	MSL	Review and revise motion and proposed order re appointment of conflict counsel; Coordinate filing re same; Communication with Wayne Klein re same	.70	154.00
9/30/19	MSL	Review changes made to declaration by counsel for Pacific Stock Transfer; Review subpoena sent to Pacific Stock Transfer; Communication with Wayne Klein re same; Review and revise notices of sale results for HD4654, HD4657, HD406, and HD4612; Coordinate filing of notices of sale results; Draft request to submit re motion to consummate settlement agreements; Coordinate filing of same	1.70	374.00

<b>TOTAL PROFESSIONAL SERVICES</b>	<b>\$ 19,233.50</b>
Less Courtesy Discount	<u>\$ -1,923.35</u>
<b>NET PROFESSIONAL SERVICES</b>	<b>\$ 17,310.15</b>

**SUMMARY OF PROFESSIONAL SERVICES**

Name	Rate	Hours	Total
Jonathan O Hafen	370.00	9.70	3,589.00
Jeffery A Balls	290.00	1.50	435.00
Michael S. Lehr	220.00	66.70	14,674.00
Sarah M Humphrey	215.00	2.20	473.00
Natalie McKean - Paralegal	125.00	.50	62.50
<b>TOTALS</b>		<b>80.60</b>	<b>\$ 19,233.50</b>

**COSTS ADVANCED**

Date	Description	Amount
7/02/19	Action Process Service of NV, Service on Pacific Stock Transfer Company	60.00
8/07/19	SimpleCertified Mail	7.10
8/07/19	SimpleCertified Mail	7.10
8/07/19	SimpleCertified Mail	7.10

<b>TOTAL COSTS ADVANCED</b>	<b>\$ 81.30</b>
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<b>TOTAL THIS INVOICE</b>	<b>\$ 17,391.45</b>
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September 30, 2019

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

Invoice: 872601  
Client: 176390  
Matter: 2

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Asset Analysis & Recovery**

Professional Services	\$ 709.50
Less Courtesy Discount	<u>\$ -70.95</u>
Net Professional Services	\$ 638.55
Total Costs Advanced	<u>\$ 90.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 728.55</b>



## PARR BROWN GEE &amp; LOVELESS

Invoice: 872601  
 RaPower-3 Receivership  
 Asset Analysis & Recovery

September 30, 2019  
 Client: 176390  
 Matter: 2

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
7/02/19	SMH	Finalize and file motion to approve sale of HD-4657 and HD-4654 properties, proposed orders re the same, and auction procedures	.70	150.50
7/23/19	SMH	Draft motion to approve sale of 120-acre Millard county property, proposed order re the same, and auction procedures re the same	1.60	344.00
7/31/19	SMH	Finalize and coordinate filing of motion to approve sale of HD-4609 property and its related exhibits	.30	64.50
8/06/19	MSL	Review non-judicial foreclosure statute re requirements for notice for notice of default; Coordinate sending Phillips notice of default to Wells Fargo	.40	88.00
8/22/19	NM	Research Wichita County probate records for Leo and Karin Brittain	.50	62.50
<b>TOTAL PROFESSIONAL SERVICES</b>				<b>\$ 709.50</b>
Less Courtesy Discount				<u>\$ -70.95</u>
<b>NET PROFESSIONAL SERVICES</b>				<b>\$ 638.55</b>

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Rate</b>	<b>Hours</b>	<b>Total</b>
Michael S. Lehr	220.00	.40	88.00
Sarah M Humphrey	215.00	2.60	559.00
Natalie McKean - Paralegal	125.00	.50	62.50
<b>TOTALS</b>		<b>3.50</b>	<b>\$ 709.50</b>

**COSTS ADVANCED**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
8/01/19	Simplifile - County Recording Fees	45.00
8/01/19	Simplifile - County Recording Fees	45.00
<b>TOTAL COSTS ADVANCED</b>		<b>\$ 90.00</b>
<b>TOTAL THIS INVOICE</b>		<b>\$ 728.55</b>



September 30, 2019

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

Invoice: 872602  
Client: 176390  
Matter: 3

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Appeal**

Professional Services	\$ 132.00
Less Courtesy Discount	<u>\$ -13.20</u>
Net Professional Services	\$ 118.80
Total Costs Advanced	<u>\$ .00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 118.80</b>

## PARR BROWN GEE &amp; LOVELESS

Invoice: 872602  
 RaPower-3 Receivership  
 Appeal

September 30, 2019  
 Client: 176390  
 Matter: 3

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
8/23/19	MSL	Communication with counsel for appellants re extension of due date for brief	.30	66.00
9/09/19	MSL	Review argument section of XSun's opening brief	.30	66.00
<b>TOTAL PROFESSIONAL SERVICES</b>				<b>\$ 132.00</b>
Less Courtesy Discount				<b>\$ -13.20</b>
<b>NET PROFESSIONAL SERVICES</b>				<b>\$ 118.80</b>

**SUMMARY OF PROFESSIONAL SERVICES**

<b>Name</b>	<b>Rate</b>	<b>Hours</b>	<b>Total</b>
Michael S. Lehr	220.00	.60	132.00
<b>TOTALS</b>		<b>.60</b>	<b>\$ 132.00</b>

**TOTAL THIS INVOICE \$ 118.80**



September 30, 2019

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

Invoice: 873683  
Client: 176390  
Matter: 4

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## INVOICE SUMMARY

Attorney: Jonathan O Hafen

For professional services rendered and costs advanced

**RE: Litigation**

Professional Services	\$ 78,132.00
Less Courtesy Discount	<u>\$ -7,813.20</u>
Net Professional Services	\$ 70,318.80
Total Costs Advanced	<u>\$ 13,485.00</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 83,803.80</b>

## PARR BROWN GEE &amp; LOVELESS

Invoice: 873683  
 RaPower-3 Receivership  
 Litigation

September 30, 2019  
 Client: 176390  
 Matter: 4

**PROFESSIONAL SERVICES RENDERED**

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
7/01/19	JAB	Draft lawsuits against Matthew Shepard and Steven Bowers	.60	174.00
7/03/19	JAB	Draft complaint against Matthew Shepard and Steven Bowers	3.30	957.00
7/08/19	JAB	Draft fraudulent transfer complaints against Matthew Shepard and Steven Bowers	1.90	551.00
7/09/19	JAB	Draft complaint against Matthew Shepard and Steven Bowers	.80	232.00
7/10/19	MSL	Draft and revise complaints for LaGrand Johnson, Glenda Johnson, and Matt Shepard; Research re real party in interest when bring suit against a trust; Review fraudulent transfer research	5.80	1,276.00
7/11/19	MSL	Draft and revise LaGrand Johnson complaint; Draft Randale Johnson complaint; Draft and revise Matthew Shepard complaint; Draft Steven Bowers complaint; Review findings of fact and conclusions of law for draft complaints; Review various other filings for draft complaints	6.70	1,474.00
7/12/19	JAB	Review and revise complaints against LaGrand and Randale Johnson	1.10	319.00
7/12/19	MSL	Review and revise LaGrand and Randale complaints; Draft Matthew Shepard and Steven Bowers complaints; Communication with Wayne Klein and Erin Healy Gallagher re complaints	4.70	1,034.00
7/13/19	MSL	Draft Steven Bowers complaint; Draft and revise Glenda Johnson complaint; Communication with Wayne Klein re Matthew Shepard Complaint	2.10	462.00
7/14/19	MSL	Legal research re remedies for use of fraudulent funds to purchase real property; Research re constructive trusts and equitable liens; Research re adding fictitious parties to a complaint; Research re summary proceeding in receiverships; Draft Glenda Johnson complaint	7.20	1,584.00
7/15/19	JAB	Conference with Michael Lehr	.20	58.00
7/15/19	MSL	Review and revise complaints against Glenda Johnson, Steven Bowers, and Matthew Shepard; Multiple communications with Wayne Klein re complaints, properties owned by Glenda Johnson, options to seek recovery of funds and property, certain suit against law firms; Communication with Jeff Balls re Glenda Johnson complaint and properties; Communication with Erin Healy Gallagher re complaints	6.00	1,320.00
7/16/19	JAB	Draft motion for turnover of property	2.70	783.00
7/16/19	MSL	Review redline of Glenda Johnson complaint; Telephone communication with Wayne Klein re strategy for recovery against Glenda Johnson; Draft email response to Wayne Klein re complaint redline and strategy for recovery against certain defendants	3.00	660.00
7/17/19	JAB	Draft complaints to recover receivership assets for Matthew Shepard and Steven Bowers; Conference with Michael Lehr re Glenda Johnson	1.60	464.00
7/17/19	MSL	Conference with Wayne Klein, Erin Healy Gallagher, and Erin Hines re litigation and recovery strategy; Communication with Jeff Balls re strategy for recovery from Glenda	1.60	352.00
7/23/19	JAB	Review complaints; Draft motion to transfer to Judge Nuffer	2.70	783.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 873683  
 RaPower-3 Receivership  
 Litigation

September 30, 2019  
 Client: 176390  
 Matter: 4

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
7/23/19	MSL	Conference with Wayne Klein, Erin Healy Gallagher, and Erin Hines re compliance declarations, litigation, and next steps; Revise complaints; Communication with Jeff Balls re motion to assign cases to Judge Nuffer; Telephone communication with Ed Wall re declaration of Neldon Johnson	2.30	506.00
7/25/19	JAB	Email Wayne Klein re exhibits for complaints; Review exhibits; Finalize complaint	1.40	406.00
7/26/19	JAB	Finalize lawsuits for filing against Steven Bowers, LeGrand Johnson and Randale Johnson; Conference with Michael Lehr; Draft summons; Correspond with Wayne Klein re exhibits	2.20	638.00
7/26/19	MSL	Communication with Wayne Klein re fee award by the court, litigation strategy moving forward and addresses of LaGrand and Randale Johnson for summons; Coordinate filing of complaints for LaGrand and Randale Johnson, Matthew Shepard, and Steven Bowers	1.10	242.00
7/29/19	JAB	Draft summons; Draft motion to transfer; Draft acceptance of service	1.60	464.00
7/29/19	MSL	Communication with Jeff Balls re service of complaints upon defendants in newly filed cases and status of other complaints	.30	66.00
7/30/19	JAB	Draft acceptance of service; Email Denver Snuffer re same	1.00	290.00
7/30/19	MSL	Conference with Wayne Klein re status of receivership, steps moving forward, and litigation priorities; Communication with Jeff Balls re same	1.70	374.00
7/31/19	JAB	Draft complaint against Ina Johnson; Draft motion to transfer; Draft notices of motion to transfer; Telephone conference with Denver Snuffer;	2.90	841.00
7/31/19	MSL	Review and coordinate filing of motion to transfer related cases to Judge Nuffer; Review and coordinate filing of notices to motion to transfer in related cases	.80	176.00
8/01/19	JAB	Draft complaint against Ina Newman	.20	58.00
8/01/19	MSL	Draft notice of default and substitution of trustee documents re trust deed of IAS on Lisa Phillips real property; Communication with Wayne Klein re same; Research Utah law re contents of notice of default and substitution of trustee	2.40	528.00
8/08/19	MSL	Review and revise Glenda Johnson complaint; Communication with Wayne Klein re Glenda complaint; Review research re receiver standing and potential defenses under the Utah's Fraudulent Conveyance statute; Conference with counsel for law firm the Receiver has made demands upon with Jon Hafen and Wayne Klein; Review opposition to motion to transfer ancillary cases to Judge Nuffer	5.20	1,144.00
8/12/19	MSL	Draft motion for turnover of properties in Millard County; Review research re Millard County Properties re same; Review research re district court's authority to conduct summary proceedings in receiverships	3.90	858.00
8/13/19	MSA	Discussion with Hafen re potential claim against Hale & Wood; Discussion and correspondence with Lehr re same; Preliminary review of documents re same	1.00	275.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 873683  
 RaPower-3 Receivership  
 Litigation

September 30, 2019  
 Client: 176390  
 Matter: 4

Date	Tkpr	Description	Hours	Amount
8/13/19	MSL	Revise Glenda Johnson complaint; Draft motion for the turnover of real properties tilted in the name of Glenda Johnson; Communication with Wayne Klein re same; Communication with Wayne Klein and Mike Anderson re demand letter to Hale and Wood	2.40	528.00
8/15/19	MSA	Correspondence with Lehr re demand letter against Hale & Wood; Discussion with Lehr re same and insurance issues; Review and analysis re insurance policies; Further correspondence and discussion with Lehr re same	2.20	605.00
8/15/19	MSL	Research re properties titled in the name of Glenda Johnson in Millard and Utah Counties for property turnover motion; Draft fact section in Glenda Johnson property turnover motion; Communication with Wayne Klein re same; Communication with Michael Anderson re demand letter to Hale & Wood	5.90	1,298.00
8/16/19	JAB	Review answer of Steven Bowers; Review opposition to motion to transfer	.20	58.00
8/16/19	MSA	Review and revise demand letter re Hale & Wood; Correspondence with Lehr re same; Correspondence with receiver re same	1.60	440.00
8/16/19	MSL	Conference with Wayne Klein re documents from Nelson Snuffer re funds from Robert Johnson in preparation for meeting; Communication with Wayne Klein re Glenda Johnson turnover motion; Draft demand letter to Hale & Wood; Communication with Michael Anderson, Jon Hafen, and Wayne Klein re same	3.80	836.00
8/17/19	MSL	Communication with Wayne Klein and Jon Hafen email from Mark James re demand letter to Hale & Wood	.60	132.00
8/19/19	JAB	Conference with Michael Lehr re status	.20	58.00
8/19/19	MSL	Met with counsel for Robert Johnson re the Receiver claims against Robert Johnson; Prepare for meeting; Communication with Wayne Klein re meeting re Robert Johnson and turnover motions	2.60	572.00
8/19/19	SMH	Conference with Michael Lehr re filing claw back complaints	.20	43.00
8/20/19	JAB	Review documents from Wayne Klein; Review reply memorandum in support of motion to transfer related cases	.60	174.00
8/20/19	MSL	Communication with Jeff Balls re complaints to be filed against commission recipients; Communication with Sara Humphreys re complaint against Diana Shepard;	.60	132.00
8/20/19	MSL	Communication with Jon Hafen and Mike Anderson re claims against law firm that represented lens purchasers in tax court; Research re potential malpractice claims	.60	132.00
8/20/19	MSL	Draft reply in support of Receiver's motion to transfer cases to Judge Nuffer; Research case law analyzing the District of Utah's local Rule re transfers; Review Nelson Snuffer's opposition to transfer motion; Communication with Jeff Balls re motion to transfer; Review documents and exhibits re motion for turnover of real property from Glenda Johnson; Review and respond to email from Wayne Klein re motion for turnover of funds from Glenda Johnson; Correspond with Wayne Klein re counterclaims asserted by defendants in ancillary cases	8.60	1,892.00



## PARR BROWN GEE &amp; LOVELESS

Invoice: 873683  
 RaPower-3 Receivership  
 Litigation

September 30, 2019  
 Client: 176390  
 Matter: 4

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
8/20/19	SMH	Draft complaint against Diana Shepard; Review Clover Meadow trust deed, demand letter to Diana Shepard, and other documents re the same; Conference with Mike Lehr re the same; Research partition by sale under Utah law	5.20	1,118.00
8/21/19	MSL	Review settlement letter re Receiver's claims against a law firm; Communication with Wayne Klein re same; Research potential causes of action against another law firm the Receivers has claims against	1.20	264.00
8/21/19	SMH	Finish drafting complaint against Diana Shepard	1.40	301.00
8/22/19	JAB	Review status; Draft consent to magistrate; Draft complaint against Diana Shepard; Draft notice of standing order	3.50	1,015.00
8/22/19	MSA	Correspondence with Lehr re revised demand against Hale & Wood; Review, analysis, and revisions re same; Correspondence with Lehr re same	.80	220.00
8/22/19	MSL	Revise demand letter to law firm re turnover of fees and potential malpractice claims; Communication with Mike Anderson re same; Communication with Natalie McKean re probate inquiry into the estate of Leo Brittain; Communication with Wayne Klein re results of probate inquiry; Communication with Jon Hafen re settlement letter sent to the Receiver from law firm; Review and respond to draft email from Receiver to law firm re settlement	4.80	1,056.00
8/22/19	MSL	Review draft complaint against Diana Shepard; Communication with Wayne Klein and Jeff Balls re Diana Shepard complaint and potential turnover motion; Conference with Jeff Balls re receiver standing in ancillary cases	2.10	462.00
8/23/19	JAB	Telephone conference with Wayne Klein; Review correspondence from Steven Pond; Email court re magistrate consent forms; Draft complaint against Ina Newman	1.40	406.00
8/23/19	MSL	Review and Revise facts section in Glenda Johnson turnover motion; Review bank and check records evidencing that real property in the name of Glenda Johnson is receivership property	3.50	770.00
8/23/19	MSL	Review draft demand letter to law firm that represented lens purchasers; Communication with Jeff Balls and Wayne Klein re Diana Shepard turnover motion; Review and revise complaint to be filed against Diana Shepard; Search recent cases filed in Utah by Neldon Johnson, Randale Johnson or LaGrand Johnson	2.10	462.00
8/25/19	MSL	Draft Glenda Johnson real property turnover motion; Research re summary proceedings authority of district court; Review corrected receivership order and affiliates order for real property turnover motion	4.30	946.00
8/26/19	MSL	Draft turnover motion re the real property titled in Glenda Johnson's name including sections re constructive trust, disgorgement, and the Court's authority to enter a judgment in summary proceedings; Communication with Jon Hafen re potential suits against law firms; Communication with Wayne Klein re meeting with counsel for Nelson Snuffer; Review email from Wayne Klein re subpoena to third party	7.10	1,562.00



## PARR BROWN GEE &amp; LOVELESS

Invoice: 873683  
 RaPower-3 Receivership  
 Litigation

September 30, 2019  
 Client: 176390  
 Matter: 4

Date	Tkpr	Description	Hours	Amount
8/27/19	MSL	Conference with Michael Skolnick, counsel for Nelson Snuffer re return of fees to the Receivership and other potential claims against the law firm; Prepare for conference with Michael Skolnick; Telephone communication with Denver Snuffer and Steven Paul re counterclaims asserted against the Receiver and lien on the solar tower property filed by Glenda Johnson; Communication with Wayne Klein re Nelson Snuffer	3.30	726.00
8/27/19	MSL	Draft motion seeking turnover of real property and funds of the Receivership estate from Glenda Johnson including facts section re funds in Glenda Johnson Bank of America account; Review local rules re summary judgment motions; Review findings of fact and conclusions of law re same; Compile exhibits re same; Communication with Wayne Klein and Cristian Gomez re exhibits	6.60	1,452.00
8/28/19	JAB	Review documents for complaint against Ina Newman	.40	116.00
8/28/19	MSL	Draft Glenda Johnson turnover motion including summary preceding authority, facts section re bank records, introduction and background section, and the appropriateness of turnover; Draft and revise Glenda Johnson complaint to include real properties; Communication with Nelson Snuffer re counterclaims	9.10	2,002.00
8/29/19	JAB	Telephone conference with Denver Snuffer re attorney planning meeting report; Finalize complaint against Ina Newman	.50	145.00
8/29/19	MSL	Revise complaint against Glenda Johnson to add the turnover of four properties and change the amounts sought due to reflect requested in Glenda Johnson turnover motion; Communication with Wayne Klein re same	2.60	572.00
8/29/19	MSL	Telephone communication with counsel for Randale Johnson, LaGrand Johnson, and Matthew Shepard re counterclaims asserted against the Receiver; Communication with Wayne Klein re same	.90	198.00
8/29/19	MSL	Draft and revise Glenda Johnson turnover motion; Draft appendix of exhibits for same; Compile exhibits for turnover motion including bank records, real property deeds, title company documents, and QuickBooks records; Coordinate redaction of bank records; Communication with Sarah Humphreys re redaction and filing of motion; Communication with Wayne Klein re revisions to turnover motion	10.30	2,266.00
8/29/19	SMH	Conference with Mike Lehr re filing motion for turnover and attending meeting with receiver re Robert Johnson claw back	.30	64.50
8/30/19	MSL	Draft and finalize appendix of exhibits for Glenda Johnson turnover motion; Compile exhibits for turnover motion; Communication with Sarah Humphreys re redaction, filing of motion, and claims against Robert Johnson for meeting with counsel for Robert Johnson; Communication with Wayne Klein re turnover motion	1.90	418.00
8/30/19	SMH	Revise and finalize Glenda Johnson turnover motion; Redact exhibits re the same; Attend meeting with receiver re turnover of Robert Johnson assets; Conference with Receiver re the same	4.70	1,010.50

## PARR BROWN GEE &amp; LOVELESS

Invoice: 873683  
 RaPower-3 Receivership  
 Litigation

September 30, 2019  
 Client: 176390  
 Matter: 4

<b>Date</b>	<b>Tkpr</b>	<b>Description</b>	<b>Hours</b>	<b>Amount</b>
9/02/19	MSL	Review redline of Glenda Johnson complaint by Wayne Klein; Review procedures for expediting briefing of a motion; Communication with Wayne Klein re Glenda Johnson complaint, motion to reappoint receiver, and probate inquiry	1.70	374.00
9/03/19	SMH	Conference with Michael Lehr re turnover motion and meeting with receiver	.10	21.50
9/04/19	JAB	Draft complaints against Ina Newman and Glenda Johnson; Conference with Michael Lehr re same; Draft civil cover sheets for same	3.10	899.00
9/04/19	MSL	Communication with Nelson Snuffer re counterclaims asserted by LaGrand Johnson, Randale Johnson, and Matthew Shepard; Final review of Glenda Johnson complaint and exhibit before filing; Conference with Jeff Balls re Ian Newman complaint and Glenda Johnson complaint; Telephone communication with Wayne Klein re Ian Newman complaint; Review tolling agreements with law firms; Communication with Wayne Klein re tolling agreements and Neldon Johnson response to DOJ's motion for additional sanctions; Review letter from receiver to Denver Snuffer re XSun and Robert Johnson	6.40	1,408.00
9/04/19	SMH	Conference with Michael Lehr re summary of meeting with Robert Johnson attorneys	.70	150.50
9/05/19	MSL	Draft summons for Ian Newman and Glenda Johnson; Communication with counsel for Glenda Johnson re acceptance of service;	.60	132.00
9/06/19	MSL	Research re jurisdiction of courts when claims are enjoined by a stay for motion to dismiss counterclaims of LaGrand Johnson, Randale Johnson, and Matthew Shepard; Draft facts section of motion to dismiss; Review settlement letter from counsel for Robert Johnson; Communication with Wayne Klein re settlement letter	2.40	528.00
9/07/19	MSL	Review draft response to counsel for Robert Johnson re settlement; Communication with Wayne Klein re same	.60	132.00
9/08/19	MSL	Draft 12(b)(1) motions to dismiss counterclaims of LaGrand Johnson, Randale Johnson, and Matthew Shepard under the Barton doctrine; Research re the Barton doctrine and obtaining leave of court before filing claims against the Receiver	5.70	1,254.00
9/09/19	JAB	Amend complaints for LaGrand Johnson, Randale Johnson and Matthew Shepard; Conference with Michael Lehr re same	1.80	522.00
9/09/19	MSL	Draft 12(b)(1) motions to dismiss the counterclaims against the Receiver asserted by LaGrand Johnson, Randale Johnson, and Matthew Shepard; Research Barton doctrine and receiver immunity for same; Review filings and orders of receivership for same; Communication with Jeff Balls and Wayne Klein re same; Finalize and incorporate changes to motions to dismiss by Wayne Klein; Coordinate filing of motions to dismiss in three separate cases; Review local rules re 12(b) motions; Email communication with Wayne Klein re litigation plan	8.80	1,936.00
9/10/19	JAB	Review 10th circuit brief; Draft attorney planning meeting reports for Randale Johnson, LaGrand Johnson, Matthew Shepard and Steven Bowers	3.00	870.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 873683  
 RaPower-3 Receivership  
 Litigation

September 30, 2019  
 Client: 176390  
 Matter: 4

Date	Tkpr	Description	Hours	Amount
9/10/19	MSL	Draft second motion to transfer ancillary cases to Judge Nuffer or, in the alternative, a single judge; Communication with Wayne Klein and Jeff Balls re same; Communication with counsel for Glenda Johnson re acceptance of service; Coordinate filing of second motion to transfer ancillary cases	4.20	924.00
9/11/19	JAB	Finalize attorney planning meeting reports for Randale Johnson, LaGrand Johnson, Steven Bowers and Matthew Shepard; Email same to counsel and pro se defendant Steven Bowers	.70	203.00
9/11/19	MSL	Review communication from law firm re settlement of Receiver's claims against them; Communication with Wayne Klein re same	.30	66.00
9/12/19	JAB	Draft complaints against Richard Blackburn, Frandsen, Hutchings and Kelvin Smith	4.20	1,218.00
9/12/19	MSL	Review draft email to law firm re settlement; Communicate with Wayne Klein re same; Conference with Jeff Balls re complaints to be filed and timeline for filing; Communication with Sierra Taylor re Stacey Snow complaint and factual circumstance; Review order's from the Utah Labor Commission re Melody Edwards petition against Cobblestone Centre; Communication with Wayne Klein re same	1.50	330.00
9/12/19	SBT	Meet with Mike Lehr to discuss complaints re Stacy Curtis Snow and Christopher Taylor (0.5)	.50	105.00
9/13/19	JAB	Draft complaints for Larry Hutchings; Call Denver Snuffer re scheduling order; Call Steven Bowers re scheduling order; Conference with Wayne Klein and Michael Lehr	4.20	1,218.00
9/13/19	MSL	Review draft settlement documents and correspondence re Robert Johnson transfers; Conference with Wayne Klein and Jeff Balls re complaints to be filed against insiders and commission recipients; Conference with counsel for Robert Johnson re settlement	2.70	594.00
9/16/19	JAB	Review complaints; Research securities violations claims; Telephone conference with Wayne Klein; Draft form complaint for commission recipients	4.50	1,305.00
9/16/19	MSL	Communication with counsel for Robert Johnson re evidence of other large transfers in June of 2018 to be used at meeting with Robert; Communication with Wayne Klein re same; Conference with Jeff Balls re standing to bring securities claims against commission recipients	.80	176.00
9/16/19	SBT	Research in preparation to draft complaint against Stacy Curtis Snow (1.6)	1.60	336.00
9/17/19	JAB	Finalize complaint against Frandsen and Hutchings; Telephone conference with Stephen Paul re scheduling order; Revise scheduling orders; Correspond with Jonathan Hafen re commission complaint	4.10	1,189.00
9/17/19	MSL	Compile information re transfers in June 2018 and fraud of Neldon Johnson for counsel for Robert Johnson's meeting with Robert Johnson; Draft communication re same; Research Neldon Johnson and Ina Marie Johnson's divorce proceeding re which attorneys represented Neldon Johnson; Communication with Wayne Klein re same	3.10	682.00
9/18/19	JAB	Draft complaints	1.00	290.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 873683  
 RaPower-3 Receivership  
 Litigation

September 30, 2019  
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 Matter: 4

Date	Tkpr	Description	Hours	Amount
9/18/19	MSL	Communication with Wayne Klein re claims against the ICSID; Research re marital property placed in trust for Diana Shepard turnover motion; Review Diana Shepard trust documents	2.40	528.00
9/19/19	JAB	Conference with Michael Lehr	.20	58.00
9/19/19	MSL	Research re marital property standards in Utah including when real property transferred to a trust is real property; Research re property placed in trust and protection from creditors; Review transfers and deeds re Diana Shepard Clover meadow home; Review Diana Shepard trust documents; Draft material facts section for Diana Shepard/Clover Meadow home turnover motion; Draft argument section re marital property in turnover motion	9.40	2,068.00
9/19/19	SBT	Draft complaints against Stacy Curtis Snow and Christopher Taylor (1.2)	1.20	252.00
9/20/19	JAB	Conference with Michael Lehr and Jonathan Hafen re securities claims; Correspond with Jonathan Hafen re draft complaint	1.30	377.00
9/20/19	MSL	Draft Diana Shepard/Clover Meadow turnover motion facts section; Draft update email to Wayne Klein re status of turnover motion, motions pending in front of the court, complaints, and securities claims; Conference with Jeff Balls and Jon Hafen re securities claims and conflicts with certain law firms	4.40	968.00
9/20/19	SBT	Draft complaints against Stacy Curtis Snow and Christopher Taylor (1.9)	1.90	399.00
9/21/19	JAB	Draft lawsuits against commission recipients, Steven Chaston, Connie Kulacz, Pamela Orgill, Scott Black and Kelvin Smith; Email Wayne Klein re same	2.00	580.00
9/22/19	MSL	Draft fraudulent transfer section in Diana Shepard/Clover Meadow turnover motion; Research re partition and forced sale of property under Utah law; Draft partition section in Diana Shepard/Clover Meadow turnover motion; Draft background section in same; Research re revocable trusts and settlors of trust under Utah law	8.50	1,870.00
9/23/19	JAB	Finalize and file complaints against Scott & Shauna Black, Connie Kulacz, Kelvin Smith, and Pamela Orgill; Draft complaints against Lyle Swenson, Ryan Davies, Paul Brennan, Shane Luke, and Dennis Stilson; Review memorandum in opposition to motion to dismiss	7.40	2,146.00
9/23/19	MSL	Draft and revise Diana Shepard/Clover Meadow turnover motion including introduction, section re marital property, and fraudulent transfer; Review Diana Shepard trust agreement for turnover motion; Research receiver standing to bring claims on behalf individuals with assets in receivership; Draft email communication to Wayne Klein re turnover motion	8.60	1,892.00
9/23/19	MSL	Review opposition to motion to dismiss in LaGrand Johnson, Randale Johnson, and Matt Shepard cases	.30	66.00
9/24/19	JAB	Conference with Wayne Klein; Finalize complaints against Lyle Swenson, Ryan Davies, Paul Brennan, Shane Luke, Steve Chaston, and Dennis Stilson; Email Wayne Klein re two complaints against Connie Kulacz; Draft complaints against commission recipients Lynette Williams, Kirk Newman, Paul Jones, Melvin Day, and Trudy Shepard	5.30	1,537.00

## PARR BROWN GEE &amp; LOVELESS

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 Litigation

September 30, 2019  
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 Matter: 4

Date	Tkpr	Description	Hours	Amount
9/24/19	MSL	Conference with Wayne Klein and Jeff Balls re litigation targets and strategy	.90	198.00
9/25/19	JAB	Finalize complaints against Lynette Williams, Kirk Newman, Paul Jones, Melvin Day, and Trudy Shepard; Draft complaints against Joel Bean, Bennett & Jordan	3.80	1,102.00
9/25/19	MSL	Communication with Wayne Klein re Clover meadow turnover motion	.10	22.00
9/26/19	JAB	Draft complaints against Carey Hadderton, Howell & Rocking H, and Steven King; Correspond with Wayne Klein re notice of receivership in North Texas	3.70	1,073.00
9/26/19	MSL	Respond to counsel for Glenda Johnson re answer to complaint	.10	22.00
9/27/19	JAB	Finalize complaints against Joel Bean, Bennett & Jordan, Carey Hadderton, Howell & Rocking H, and Steven King; Correspond with Wayne Klein re initial disclosures; Draft complaints against Mike Mahler, Mark Manley, Thomas Mooney, Carl Palmore, and Janet Roe	3.50	1,015.00
9/27/19	MSL	Revise Diana Shepard Clover Meadow turnover motion; Communication with the Erin Healy Gallagher re same	.90	198.00
9/30/19	JAB	Finalize complaints against Mike Mahler, Mark Manley, Thomas Mooney, Carl Palmore, and Janet Roe; Review pleadings; Draft complaints against Kelvin Anderson, Raleigh Stewart, Joseph Scraggs, Debbie Smith, and Jason Clement, Edward Kinsey, and Suncore	3.10	899.00
9/30/19	MSL	Review letter for counsel for Bryan Sorenson re demand letter sent by receiver; Telephone communication with counsel for Bryan Sorenson re request to speak to Wayne Klein; Communication with Erin Healy Gallagher and Wayne Klein re Diana Shepard turnover motion	.90	198.00

<b>TOTAL PROFESSIONAL SERVICES</b>	<b>\$ 78,132.00</b>
Less Courtesy Discount	<u>\$ -7,813.20</u>
<b>NET PROFESSIONAL SERVICES</b>	<b>\$ 70,318.80</b>

## SUMMARY OF PROFESSIONAL SERVICES

Name	Rate	Hours	Total
Jeffery A Balls	290.00	87.90	25,491.00
Michael S Anderson	275.00	5.60	1,540.00
Michael S. Lehr	220.00	215.00	47,300.00
Sarah M Humphrey	215.00	12.60	2,709.00
Sierra B Taylor	210.00	5.20	1,092.00
<b>TOTALS</b>		<b>326.30</b>	<b>\$ 78,132.00</b>

## COSTS ADVANCED

Date	Description	Amount
7/26/19	Filing Fees, UT Courts	400.00



## PARR BROWN GEE &amp; LOVELESS

Invoice: 873683  
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 Litigation

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 Client: 176390  
 Matter: 4

<b>Date</b>	<b>Description</b>	<b>Amount</b>
7/26/19	Filing Fees, UT Courts	400.00
7/26/19	Filing Fees, UT Courts	400.00
7/26/19	Filing Fees, UT Courts	400.00
9/04/19	Filing Fees, Utah Courts	400.00
9/04/19	Filing Fees, Utah Courts	400.00
9/09/19	Office of the Utah County Constable LLC -- service of summons and complaint on Ina Marie Newman	39.00
9/17/19	Filing Fees, Utah Courts, complaint	400.00
9/20/19	Office of the Utah County Constable LLC -- Hutchings - Service of Summons and Complaint	39.00
9/23/19	Filing Fees, Utah Courts	400.00
9/23/19	Filing Fees, Utah Courts, complaint	400.00
9/23/19	Filing Fees, Utah Courts	400.00
9/23/19	Filing Fees, Utah Court, complaint	400.00
9/24/19	Filing Fees, Utah Courts	400.00
9/24/19	Filing Fees, Utah Court, complaint	400.00
9/24/19	Filing Fees, Utah Court, complaint	400.00
9/24/19	Filing Fees, Utah Courts, complaint	400.00
9/24/19	Filing Fees, Utah Court, complaint	400.00
9/24/19	Filing Fees, Utah Court, complaint	400.00
9/24/19	Filing Fees, Utah Court, complaint	400.00
9/24/19	Filing Fees, Utah Court, complaint	400.00
9/25/19	Filing Fees, Complaint, Pay.gov	400.00
9/25/19	Filing Fees, Complaint, Pay.gov	400.00
9/25/19	Filing Fees, Complaint, Pay.gov	400.00
9/25/19	Filing Fees, Complaint, Pay.gov	400.00
9/25/19	Filing Fees, Complaint, Pay.gov	400.00
9/26/19	Office of the Utah County Constable LLC -- Davies - Service of Summons and Complaint	39.00
9/27/19	Filing Fees, Complaint, Pay.gov	400.00
9/27/19	Filing Fees, Complaint, Pay.gov	400.00
9/27/19	Filing Fees, Complaint, Pay.gov	400.00
9/27/19	Filing Fees, Complaint, Pay.gov	400.00
9/27/19	Filing Fees, Complaint, Pay.gov	400.00
9/27/19	Office of the Utah County Constable LLC -- Brennan - Service of Summons and Complaint	79.00
9/27/19	Office of the Utah County Constable LLC -- Kulacz - Service of Summons and Complaint	39.00
9/27/19	Office of the Utah County Constable LLC -- Alodel LLC - Service of Summons and Complaint	49.00
9/27/19	Office of the Utah County Constable LLC -- Shane Luke - Service of Summons and Complaint	49.00
9/27/19	Office of the Utah County Constable LLC -- Smith - Service of Summons and Complaint	79.00
9/30/19	Filing Fees, Complaint, Pay.gov	400.00
9/30/19	Filing Fees, Complaint, Pay.gov	400.00
9/30/19	Filing Fees, Complaint, Pay.gov	400.00
9/30/19	Filing Fees, Complaint, Pay.gov	400.00
9/30/19	Filing Fees, Complaint, Pay.gov	400.00

## PARR BROWN GEE &amp; LOVELESS

Invoice: 873683  
 RaPower-3 Receivership  
 Litigation

September 30, 2019  
 Client: 176390  
 Matter: 4

<b>Date</b>	<b>Description</b>	<b>Amount</b>
9/30/19	Office of the Utah County Constable LLC -- Scott Black - Service of Summons and Complaint	39.00
9/30/19	Office of the Utah County Constable LLC -- Shauna Black - Service of Summons and Complaint	39.00
9/30/19	Office of the Utah County Constable LLC -- Chaston - Service of Summons and Complaint	39.00
9/30/19	Office of the Utah County Constable LLC -- Independent Financial Services - Service of Summons and Complaint	39.00
9/30/19	Office of the Utah County Constable LLC -- Trudy Shepard - Service of Summons and Complaint	39.00
9/30/19	Office of the Utah County Constable LLC -- Lynette Williams - Service of Summons and Complaint	39.00
9/30/19	Office of the Utah County Constable LLC -- Melvin Thomas Day - Service of Summons and Complaint	39.00
<b>TOTAL COSTS ADVANCED</b>		<b>\$ 13,485.00</b>
<b>TOTAL THIS INVOICE</b>		<b>\$ 83,803.80</b>

## **EXHIBIT B-3**



**LONEPEAK**

VALUATION GROUP

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

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

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

Federal ID No. 26-2104291

Wayne Klein, Receiver  
36 S State Street  
Suite 500  
Salt Lake City, UT 84111Invoice Date: 08/01/2019  
Invoice No. 18974  
Page No. 1Account No. 1481.000  
RE: United States v. RaPower-3, LLC, et al.Fees

			Rate	Hours	
07/02/2019	CGO	File Review - Research for Receiver to determine sources of 3rd party payments	135.00	7.00	945.00
07/03/2019	CGO	File Review - Research for Receiver to determine sources of 3rd party payments, Modification of Master Transaction Listing	135.00	6.50	877.50
07/05/2019	CGO	File Review - Research for Receiver to determine sources of 3rd party payments, Modification of Master Transaction Listing	135.00	3.50	472.50
07/08/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. Input information from the stock brokerage to prepare for further analysis of the stock sales.	45.00	4.40	198.00
	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. Input data from the stock brokerage to prepare for analysis about stock sales.	45.00	0.35	15.75
07/09/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model.- Completed data entry to analyze stock sales.	45.00	4.50	202.50
	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. - Input more securities data into excel	45.00	0.20	9.00
	LRI	File Review Research of 1099 contractors paid more than \$5K	130.50	4.67	609.44
	CGO	File Review - Upload new version of Master File, run matching transactions	135.00	9.75	1,316.25
07/10/2019	LRI	File Review Transaction input/analysis of 1099 contractors paid over \$5K	130.50	3.67	478.94
	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. - Input data to analyze stock information.	45.00	1.30	58.50
	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. - Did some work on a			

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: 08/01/2019  
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			Rate	Hours	
		project to get stock data ready for analysis.	45.00	1.20	54.00
	CGO	File Review - Modification of Master File, Implement into Power BI, Research for Receiver to verify payments to 3rd parties	135.00	7.25	978.75
07/11/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. - Completed inputting data for analyzing stock sales based of confirmations and SEC Form 4's.	45.00	1.60	72.00
	CGO	File Review - Research for Receiver to verify payments to 3rd parties	135.00	6.25	843.75
07/12/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. - Prepared spreadsheet reports for the stock sales of Neldon Johnson.	45.00	2.30	103.50
	CGO	File Review - Research for Receiver to verify payments to 3rd parties	135.00	3.75	506.25
07/15/2019	CGO	File Review - Research for Receiver to verify sources of payments to 3rd parties, Modification of Master File	135.00	6.50	877.50
07/16/2019	CGO	File Review - Research for Receiver to verify sources of payments to 3rd parties	135.00	7.00	945.00
07/17/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. - Input more data regarding stock sales.	45.00	2.40	108.00
	CGO	File Review - Research for Receiver to verify sources of payments to 3rd parties	135.00	3.25	438.75
07/18/2019	CGO	File Review - Research for Receiver to verify sources of payments to 3rd parties, Modification of Master File	135.00	6.75	911.25
07/19/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. -Input more data relating to stock sales.	45.00	2.25	101.25
	CGO	File Review - Research for Receiver to verify sources of payments to 3rd parties, Present analysis to Receiver	135.00	7.00	945.00
07/22/2019	CGO	File Review - Research potential recipients of interest	135.00	6.75	911.25
07/23/2019	CGO	File Review - Research potential recipients of interest, Compare listing of bank accounts provided by defendants to accounts in our records, Review defendant detail of real estate in wife's name	135.00	6.50	877.50
07/25/2019	CGO	File Review - Create schedules for Receiver, Search boxes for evidence of Glenda/Neldon credit cards	135.00	2.75	371.25
07/26/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. - Entered data relating to stock sales into the stock sales spreadsheet.	45.00	4.00	180.00
	CGO	File Review - Implement modified MAster File into Access and Power BI, Meeting with Receiver, Preparation of listing of potential			

Wayne Klein, Receiver  
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Invoice Date: 08/01/2019  
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			Rate	Hours	
		targets for funds recovery	135.00	7.50	1,012.50
07/29/2019	LRI	File Review Credit card transaction/bankscan analysis of Credit Cards	130.50	4.58	597.69
	CGO	File Review - Preparation of listing of potential targets for funds recovery	135.00	7.50	1,012.50
07/30/2019	LRI	File Review Credit card statement bankscan work/creation of schedule	130.50	7.58	989.19
	CGO	File Review - Preparation of listing of potential targets for funds recovery, Review Glenda credit card statements	135.00	6.25	843.75
07/31/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. -Input more data into the spreadsheet for stock sales.	45.00	7.50	337.50
	LRI	File Review analysis of the credit card transactions and delivery to Christian	130.50	2.25	293.63
	CGO	File Review - Preparation of listing of potential targets for funds recovery, Review Glenda credit card statements	135.00	6.50	877.50
		For Current Services Rendered		173.00	20,372.64

Hours - Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Total</u>
Robert Aldous, Staff	32.00	\$1,440.00
Cristian Gomez, Analyst	118.25	15,963.75
Luke Richins, Analyst	22.75	2,968.89

Total Current Work	20,372.64
Previous Balance	\$63,916.07
Balance Due	<u>\$84,288.71</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>
20,372.64	39,003.32	0.00	24,912.75	0.00	0.00

**LONEPEAK**

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SALT LAKE CITY, UTAH 84111

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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: 09/03/2019  
 Invoice No. 19133  
 Page No. 1

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

Fees

			Rate	Hours	
08/01/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. -Input more data relating to stock sales.	45.00	3.30	148.50
	CGO	File Review - Preparation of listing of potential targets for funds recovery	135.00	7.25	978.75
	LRI	File Review Update and review of inputted checks Update and review of inputted checks	130.50	0.75	97.88
08/02/2019	CGO	File Review - Preparation of listing of potential targets for funds recovery, Meeting with Receiver	135.00	6.25	843.75
08/05/2019	CGO	File Review - Preparation of listing of potential targets for funds recovery	135.00	9.25	1,248.75
08/06/2019	CGO	File Review - Preparation of listing of potential targets for funds recovery	135.00	6.50	877.50
08/07/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. - Input more data on stock sales into the excel spreadsheet to be used in the analysis in stock sales.	45.00	1.60	72.00
	LRI	Internal Conference - Conference with Lone Peak personnel to discuss the engagement and/or coordinate future work activities. Meeting with Christian regarding creation of demand letters	130.50	0.42	54.81
	CGO	File Review - Preparation of listing of potential targets for funds recovery	135.00	7.75	1,046.25
08/08/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. -Input a lot of data from the mountain of papers into the stock sales spreadsheet.	45.00	6.90	310.50
	LRI	File Review Creation and printing of demand letters to individuals per Wayne. Creation of and printing of demand letters to individuals	130.50	3.41	445.01
	LRI	Develop, create and modify schedules and analyses Credit Card			

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: 09/03/2019  
 Invoice No. 19133  
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			Rate	Hours	
		analysis per Wayne Request - updates to previously created credit card schedules. Credit Card analysis - updates to previously creation schedules.	130.50	3.17	413.69
08/09/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. - Input data for the stock sales	45.00	1.50	67.50
08/12/2019	CGO	File Review - Research for Receiver to identify payments made to 3rd parties, Search for addresses for 3rd parties	135.00	7.25	978.75
08/13/2019	CGO	File Review - Research for Receiver to identify payments made from Receivership entities to credit cards and other 3rd parties	135.00	7.50	1,012.50
08/14/2019	LRI	File Review Generated and printed new draft letters for individuals that Christian located address for. Later located and printed copies of Checks to James Woodson and Powatan Athletics	130.50	1.33	173.57
	CGO	File Review - Research for Receiver to identify payments made from Receivership entities to credit cards and other 3rd parties, Preparation of letters and schedules to send to 3rd parties	135.00	6.50	877.50
08/15/2019	LRI	File Review Located and printed checks for an individual from demand letters per Wayne request.	130.50	0.17	22.19
	CGO	File Review - Research for Receiver to identify payments from Receivership entities to 3rd parties, Preparation of letters and schedules to send to 3rd parties	135.00	2.75	371.25
08/16/2019	CGO	File Review - Collect exhibits for Glenda real estate transactions and review draft	135.00	8.00	1,080.00
08/19/2019	LRI	Internal Conference - Conference with Lone Peak personnel to discuss the engagement and/or coordinate future work activities. Meeting with Wayne to go over RC Willey steps/expectations	130.50	0.33	43.07
	LRI	Develop, create and modify schedules and analyses Creation, research, and analysis of the RC Willey Transactions. Tracked down what was purchased, where it was delivered, who made the payments, etc.	130.50	4.83	630.32
	CGO	File Review - Create visual to explain cash movement for Glenda Johnson real estate transactions, Meeting with Receiver, Create solvency analysis of Glenda Johnson	135.00	7.50	1,012.50
08/20/2019	CGO	File Review - Create solvency analysis of Glenda, Research addresses	135.00	5.00	675.00
08/21/2019	CGO	File Review - Search for current addresses of 3rd parties	135.00	2.50	337.50
08/22/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. -	45.00	2.50	112.50
08/23/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. -	45.00	6.30	283.50

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

Invoice Date: 09/03/2019  
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			Rate	Hours	
08/26/2019	CGO	File Review - Research for Receiver to find payments made to 3rd parties	135.00	0.50	67.50
08/27/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. -	45.00	6.20	279.00
	CGO	File Review - Search for updated addresses for 3rd parties	135.00	0.75	101.25
08/28/2019	CGO	File Review - Create flowchart for payment, Research for payments to 3rd party	135.00	0.75	101.25
08/29/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. -	45.00	2.00	90.00
08/30/2019	CGO	File Review - Search for 3rd party addresses, Review real estate payments, Review documents from NSDP	135.00	3.50	472.50
	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. -	45.00	4.50	202.50
		For Current Services Rendered		138.71	15,529.04

Hours - Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Total</u>
Robert Aldous, Staff	34.80	\$1,566.00
Cristian Gomez, Analyst	89.50	12,082.50
Luke Richins, Analyst	14.41	1,880.54

Total Current Work	15,529.04
Previous Balance	\$84,288.71
<b>Balance Due</b>	<b><u>\$99,817.75</u></b>

<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>
15,529.04	20,372.64	27,674.57	11,328.75	24,912.75	0.00

**LONEPEAK**

VALUATION GROUP

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

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

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Federal ID No. 26-2104291

Wayne Klein, Receiver  
36 S State Street  
Suite 500  
Salt Lake City, UT 84111Invoice Date: 10/01/2019  
Invoice No. 19424  
Page No. 1Account No. 1481.000  
RE: United States v. RaPower-3, LLC, et al.Fees

			Rate	Hours	
09/03/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. -	45.00	5.10	229.50
	CGO	Develop, create and modify schedules and analyses	135.00	1.10	148.50
09/05/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. -	45.00	2.20	99.00
09/06/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. -	45.00	7.80	351.00
09/09/2019	CGO	File Review - Research for Receiver to identify payments to 3rd party	135.00	0.50	67.50
09/11/2019	CGO	File Review - Research current address of 3rd party	135.00	0.25	33.75
09/12/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. -	45.00	0.80	36.00
09/13/2019	RAL	Data Entry - Reviewed documents, identified financial data and entered financial information into model. -	45.00	5.10	229.50
	CGO	File Review - Research for Receiver to identify payments to 3rd party	135.00	0.25	33.75
09/16/2019	LRI	Develop, create and modify schedules and analyses. New Citibank Credit Card retrieval and research for Wayne & Christian.	130.50	5.42	707.31
	CGO	File Review - Prepare schedules of 3rd party payments for Receiver	135.00	3.50	472.50
09/17/2019	LRI	Internal Conference - Conference with Lone Peak personnel to discuss the engagement and/or coordinate future work activities. Meetings with Wayne to go over needs for CITI credit card data.	130.50	0.67	87.44
	LRI	Develop, create and modify schedules and analyses. Finishing creation of schedules and analysis of payments to Citibank cards			

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



Wayne Klein, Receiver  
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		Rate	Hours	
	by other entities	130.50	2.75	358.88
	RAL Data Entry - Reviewed documents, identified financial data and entered financial information into model. -	45.00	3.80	171.00
	CGO File Review - Prepare schedules of 3rd party payments for Receiver	135.00	4.75	641.25
09/18/2019	LRI Develop, create and modify schedules and analyses Meeting with Wayne and subsequent bankscan of and beginning of review for Costco accounts -1755 and -8417 in preparation to sue Citibank.	130.50	6.67	870.44
09/19/2019	LRI Develop, create and modify schedules and analyses Continuing bankscan and review of citibank accounts -8417 and -1755	130.50	3.08	401.94
	RAL Data Entry - Reviewed documents, identified financial data and entered financial information into model. -	45.00	4.30	193.50
09/20/2019	LRI Develop, create and modify schedules and analyses Input, update, and formatting of credit cards from Citibank	130.50	2.75	358.88
	RAL Data Entry - Reviewed documents, identified financial data and entered financial information into model. -	45.00	1.00	45.00
09/23/2019	CGO File Review - Prepare schedules of payments to 3rd parties	135.00	2.50	337.50
09/24/2019	LRI Develop, create and modify schedules and analyses Update of Home Depot summary for Wayne	130.50	0.33	43.07
	CGO File Review - Research for Receiver to locate payments made to 3rd party	135.00	0.25	33.75
	JWO Database research and identification of subject.	225.00	1.90	427.50
09/26/2019	RAL Data Entry - Reviewed documents, identified financial data and entered financial information into model. - Completed filling in and editing the stock sales file and normalizing it. It is ready to be prepared for analysis.	45.00	3.50	157.50
09/27/2019	RAL Data Entry - Reviewed documents, identified financial data and entered financial information into model. -	45.00	1.70	76.50
	For Current Services Rendered		<u>71.97</u>	<u>6,612.46</u>

Hours - Summary

<u>Timekeeper</u>	<u>Hours</u>	<u>Total</u>
Robert Aldous, Staff	35.30	\$1,588.50
James Wood, Principal	1.90	427.50
Cristian Gomez, Analyst	13.10	1,768.50
Luke Richins, Analyst	21.67	2,827.96

Total Current Work	6,612.46
Previous Balance	\$99,817.75
Balance Due	<u>\$106,430.21</u>



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

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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>	
22,141.50	0.00	20,372.64	39,003.32	24,912.75	0.00	