

E-FILED

07-12-2022, 12:03

Honorable D^c **Scott G. Weber, Clerk**
Clark County

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SUPERIOR COURT OF WASHINGTON FOR CLARK COUNTY

9 In re:

Case No. 19-2-01458-06

10 AMERICAN EAGLE MORTGAGE 100,
11 LLC; AMERICAN EAGLE MORTGAGE
12 200, LLC; AMERICAN EAGLE
13 MORTGAGE 300, LLC; AMERICAN
14 EAGLE MORTGAGE 400, LLC;
15 AMERICAN EAGLE MORTGAGE 500,
16 LLC; AMERICAN EAGLE MORTGAGE
17 600, LLC; AMERICAN EAGLE
18 MORTGAGE MEXICO 100, LLC;
19 AMERICAN EAGLE MORTGAGE
20 MEXICO 200, LLC; AMERICAN EAGLE
MORTGAGE MEXICO 300, LLC;
AMERICAN EAGLE MORTGAGE
MEXICO 400, LLC; AMERICAN EAGLE
MORTGAGE MEXICO 500, LLC;
AMERICAN EAGLE MORTGAGE
MEXICO 600, LLC; AMERICAN EAGLE
MORTGAGE I, LLC; AMERICAN EAGLE
MORTGAGE II, LLC; and AMERICAN
EAGLE MORTGAGE SHORT TERM, LLC.

RECEIVER'S NOTICE OF INTENT TO
COMPENSATE (JUNE 2022)

21 TO: AMERICAN EAGLE MORTGAGE 100 LLC; AMERICAN EAGLE
22 MORTGAGE 200, LLC; AMERICAN EAGLE MORTGAGE 300, LLC;
23 AMERICAN EAGLE MORTGAGE 400, LLC; AMERICAN EAGLE
24 MORTGAGE 500, LLC; AMERICAN EAGLE MORTGAGE 600, LLC;
25 AMERICAN EAGLE MORTGAGE MEXICO 100, LLC; AMERICAN EAGLE
26 MORTGAGE MEXICO 200, LLC; AMERICAN EAGLE MORTGAGE
MEXICO 300, LLC; AMERICAN EAGLE MORTGAGE MEXICO 400, LLC;
AMERICAN EAGLE MORTGAGE MEXICO 500, LLC; AMERICAN EAGLE
MORTGAGE MEXICO 600, LLC; AMERICAN EAGLE MORTGAGE I, LLC;
AMERICAN EAGLE MORTGAGE II, LLC; and AMERICAN EAGLE
MORTGAGE SHORT TERM, LLC;

RECEIVER'S NOTICE OF INTENT TO COMPENSATE
(JUNE 2022) - 1

4867-6351-3383.1

MILLER NASH LLP
ATTORNEYS AT LAW
T: 206.624.8300 | F: 206.340.9599
PIER 70
2801 ALASKAN WAY, SUITE 300
SEATTLE, WASHINGTON 98121

1 AND TO: Parties requesting special notice.

2 Clyde A. Hamstreet & Associates, LLC, the duly appointed general receiver herein (the
3 “Receiver”), submits the Receiver’s Notice of Intent to Compensate (June 2022) in accordance
4 with Paragraph 11 of the Order Appointing General Receiver dated May 10, 2019 (the
5 “Receivership Order”), which provides in part: “The Receiver and the Receiver’s authorized
6 attorneys and other professionals may request to be compensated on an interim or final basis.”

7 RCW 7.60.180(4) further provides:

8 The receiver, and any professionals employed by the
9 receiver, is permitted to file an itemized billing statement with the
10 court indicating both the time spent, billing rates of all who perform
11 work to be compensated, and a detailed list of expenses and serve
12 copies on any person who has been joined as a party in the action,
or any person requesting the same, advising that unless objections
are filed with the court, the receiver may make the payments
specified in the notice.

13 Attached as Exhibit A hereto is a true and correct copy of the Receiver’s time and
14 expense summary for services and costs in June 2022. For this period, the Receiver requests final
15 approval of its compensation in the amount of \$23,429.00 and reimbursement of no costs, for a
16 total payment of \$23,429.00.

17 Attached as Exhibit B hereto is a true and correct copy of the time and expense summary
18 of the Receiver’s authorized attorneys, Miller Nash LLP, for services and costs in June 2022. For
19 this period, such attorneys request final approval of their compensation in the amount of
20 \$75,397.00 and reimbursement of costs of \$1,476.25, for a total payment of \$76,873.25.

21 Attached as Exhibit C hereto is a true and correct copy of the time and expense summary
22 of the Receiver’s authorized public communications consultants, Gard Communications, Inc., for
23 services and costs in June 2022. For this period, such consultants request final approval of their
24 compensation in the amount of \$321.25 and reimbursement of no costs, for a total payment of
25 \$321.25.

1 Attached as Exhibit D hereto is a true and correct copy of the time and expense summary
2 of the Receiver's authorized special counsel in Mexico, Rosen Law, S.C., for services and costs
3 in June 2022. For this period, such attorneys request final approval of their compensation in the
4 amount of \$4,162.00 and reimbursement of no costs, for a total payment of \$4,162.00.

5 Unless objections to the foregoing requests are filed with the Court and served on the
6 undersigned attorneys so as to be received by July 25, 2022, the Receiver may make the
7 payments requested herein and/or the professionals may apply their retainers, if any.

8 DATED this 12th day of July, 2022.

9 MILLER NASH LLP

10
11 /s/ John R. Knapp, Jr.

12 John R. Knapp, Jr., P.C., WSB No. 29343

13 Attorneys for Receiver
14 Clyde A. Hamstreet & Associates, LLC

EXHIBIT A



One SW Columbia, Suite 1575
Portland, OR 97204
(503) 223-6222

Invoice submitted to:
American Eagle Mortgage Investment Funds Receiverships
4225 NE St James Road
Vancouver, WA 98663

July 8, 2022

Invoice # 2555

Professional Services

			<u>Hours</u>	<u>Amount</u>
6/1/2022	HS	Riverview Bank Respond to interrogatories.	2.00	920.00
	HS	Receivership Duties Case administration work. Respond to emails, update website, process onsite contract receipts.	3.00	1,380.00
6/2/2022	HS	Receivership Duties Mar de Plata status call.	0.40	184.00
6/3/2022	HS	Receivership Duties Call with John Knapp regarding distribution procedures with court.	0.30	138.00
	HS	Litigation Support Prepare for and call with Joe Vance and Gary Stoley.	1.00	460.00
	HS	Pacific Premier Bank Continue review of Pacific Premier Bank loan documentation.	4.00	1,840.00
6/6/2022	HS	Pacific Premier Bank Trace cash activity regarding Pacific Premier Bank loans.	3.00	1,380.00
6/7/2022	HS	Receivership Duties Read and respond to emails regarding real estate transactions.	0.50	230.00
	HS	Pacific Premier Bank Continue work to document flow of funds.	2.50	1,150.00
	HS	Pacific Premier Bank Prepare for and call with Joe Vance regarding June 2 letter from Pacific Premier Bank.	1.50	690.00
6/8/2022	HS	Investor Relations Call with Joanie Spradlin.	0.30	138.00

			<u>Hours</u>	<u>Amount</u>
6/8/2022	HS	Receivership Duties Read and respond to emails regarding real estate transactions.	0.30	138.00
	HS	Litigation Support Review questions from and gather information for banking expert.	4.00	1,840.00
6/10/2022	HS	Litigation Support Respond to and gather information for Gary Stoley.	3.00	1,380.00
6/13/2022	HS	Litigation Support Call with Joe Vance and Gary Stoley. Follow up work regarding same.	1.40	644.00
6/16/2022	HS	Riverview Bank Call with Joe Vance regarding production. Follow up work regarding same.	0.40	184.00
	HS	Receivership Duties Call with Ben Rosen, Valerio Gonzalez and Jim Hart regarding Mar de Plata.	0.80	368.00
6/17/2022	HS	Litigation Support Call with Gary Stoley and Rod Werhan.	0.60	276.00
	HS	Litigation Support Respond to questions from Joe Vance and Gary Stoley.	2.00	920.00
6/20/2022	HS	Receivership Duties Status discussion with Clyde Hamstreet.	0.90	414.00
	CAH	Receivership Duties Review status of Riverview litigation, DWT settlement's impact on partial distribution, the Mexico property development and pressures for donations. Follow up work with Hannah Schmidt regarding the same.	1.60	960.00
6/21/2022	HS	Receivership Duties Read and respond to emails.	0.20	92.00
6/22/2022	HS	Receivership Duties Respond to calls, emails, and mail.	1.00	460.00
	HS	Riverview Bank Review interrogatory responses.	1.30	598.00
	HS	Litigation Support Respond to question from Miller Nash and Gary Stoley.	3.00	1,380.00
6/23/2022	HS	Receivership Duties Prepare for and call with Daniela Velazquez and Evelyn Torres regarding topographical work on Todos Santos and East Cape properties.	0.80	368.00
	HS	Pacific Premier Bank Continue review of Pacific Premier Bank loan information.	2.50	1,150.00
6/24/2022	HS	Riverview Bank Sign interrogatory response.	0.10	46.00

		<u>Hours</u>	<u>Amount</u>
6/24/2022	HS Pacific Premier Bank Review interrogatory response.	0.50	230.00
6/27/2022	HS Litigation Support Emails with Stoley team. Call with Joe Vance.	0.40	184.00
	HS Receivership Duties Emails with Felicia Muli regarding Evergreen reconciliation.	0.20	92.00
6/28/2022	HS Pacific Premier Bank Review questions from Joe Vance and upload additional documents for Stoley team.	1.00	460.00
6/29/2022	HS Receivership Duties Review drafts of Mar de Plata documents and forward to Jim Hart.	0.70	322.00
	HS Litigation Support Research and respond to questions from Stoley team.	2.80	1,288.00
6/30/2022	FM Administrative Services Work on reporting and bank reconciliations.	7.50	1,125.00
For professional services rendered		55.50	\$23,429.00
Accounts receivable transactions			
7/6/2022	Payment invoice 2549- Thank You. Check No. 1623		(\$36,709.00)
Total payments and adjustments			(\$36,709.00)
Balance due			<u>\$23,429.00</u>

Consultant Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Clyde A. Hamstreet - Principal	1.60	600.00	\$960.00
Hannah Schmidt - Consultant	46.40	460.00	\$21,344.00
Felicia Muli	7.50	150.00	\$1,125.00

EXHIBIT B

Client.Matter	Description	Bill Amt	Fees	Costs	Bill Num
721921.0001	American Eagle Mortgage Investment Funds	\$5,094.00	\$4,974.00	\$120.00	2189297
721921.0017	Adjunct Litigation Claims Against Ross Miles, Maureen Wile, et al.	\$71,779.25	\$70,423.00	\$1,356.25	2189298
		\$76,873.25	\$75,397.00	\$1,476.25	



Clyde A. Hamstreet & Associates, LLC
Attn: Clyde A. Hamstreet
One SW Columbia Street, Suite 1575
Portland, OR 97258

Account: 721921.0001
American Eagle Mortgage Investment Funds Receivership

Invoice: 2189297
July 8, 2022

Invoice Summary

Professional Fees Through June 30, 2022	\$4,974.00
Disbursements	<u>\$120.00</u>
Amount Due – Current Period:	<u>\$5,094.00</u>

To pay by wire transfer, route to:

Miller Nash LLP, U.S. Bank National Association
Account # 1536-0646-7352, Routing # 123000220,
Swift Code USBKUS44IMT
Bank address: 321 SW 6th Avenue, Portland, OR 97204

To pay by credit card, use this link:

<https://secure.lawpay.com/pages/millernash/operating>

To pay by check, remit to:

PO Box 3585
Portland, OR 97208-3585

Accounts due and payable in U.S. dollars upon receipt. Please include invoice number with remittance. Invoice may not include all fees and expenses incurred prior to statement closing date. Late charges of .75% per month (9% annually) will accrue on all amounts unpaid after 30 days from date of invoice. Tax ID # 93-0410518.

July 8, 2022

Invoice Detail

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
06/01/22	D. Foraker	0.1	Review email from Hannah Schmidt re second interim investor distribution and related emails
06/01/22	J. Knapp	1.3	Email communications with Al and Andrea Elkins re claim transfer (.3); email communications with Hannah Schmidt re same (.3); review claims register, proofs of claim, and order fixing allowed amounts of investor claims (.4); email communications with Hannah Schmidt re distribution procedures (.3)
06/03/22	J. Knapp	0.6	Review order fixing allowed amounts of investor claims (.2); virtual meeting with Hannah Schmidt re second interim investor distribution and re status of pending property sales (.4)
06/06/22	J. Knapp	0.7	Review AEM website (.1); emails with Hannah Schmidt re Tamar Unit #201 sale (.1); draft Tamar Unit #201 sale notice (.1); emails with professionals re notice of intent to compensate (May 2022) (.2); emails with Naureen Khan re sale notice matters (.2)
06/07/22	J. Knapp	0.8	Emails with Michael Ueltzen re notice of intent to compensate (May 2022) (.1); emails with Naureen Khan re transmittal of Tamar Unit #201 sale notice for posting to website (.2); emails with Hannah Schmidt re Tamar Unit #201 sale notice (.2); draft notice of intent to compensate (May 2022) (.3)
06/07/22	J. Knapp	0.1	Emails with Teri Yamauchi re notice of intent to compensate (May 2022)
06/10/22	N. Levy	0.7	Review Texas law re release of deeds of trust (.2); review property records re deed of trust to be released (.3) email with Hannah Schmidt re release of Texas deed of trust (.2)
06/15/22	J. Knapp	1.0	Continue drafting notice of intent to compensate (May 2022)

July 8, 2022

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
06/16/22	H. Harmon	0.1	Obtain copy of complaint filed by Douglas and Suzanne Nichols against American Equities defendants for attorney review
06/16/22	J. Knapp	1.1	Finalize notice of intent to compensate (May 2022) (.2); email communications with Naureen Khan re transmittal of notice of intent to compensate (May 2022) for posting to website (.3); review website to confirm posting (.1); voicemail from April Kelly Smith with Colonial Title re Kemp, Texas, property (.1); review file re Kemp, Texas, property (.2); email communications with Nat Levy re Kemp, Texas, property (.2)
06/16/22	N. Levy	0.2	Emails with John Knapp re Kemp, Texas, property (.1); telephone call to Kemp, Texas, title officer re status of closing (.1)
06/17/22	N. Levy	0.2	Telephone call with Kemp, Texas, title officer re sale of real property; (.1) email with Hannah Schmidt re Kemp, Texas, sale (.1)
06/22/22	H. Harmon	0.2	Finalize motion, declaration, and order for approval of sale of Tamar #201 condominium and coordinate ex parte presentation
06/22/22	J. Knapp	1.3	Review court docket (.1); emails with Hannah Schmidt re no objections to Tamar Unit #201 sale notice and submitting ex parte approval motion (.2); emails with Heather Harmon re ex parte approval motion for Tamar Unit #201 sale (.4); draft ex parte motion to approve sale of Tamar Unit #201, declaration of John Knapp, and proposed order (.6)
06/24/22	H. Harmon	0.1	Obtain conformed copies of motion, declaration, and order for approval of sale of Tamar #201 condominium
06/24/22	J. Knapp	0.4	Review filed motion and entered order approving receiver's sale of Tamar Unit #201 (.1); emails with Naureen Khan re transmittal of Tamar Unit #201 court filings for posting to website (.2); email communications with Hannah Schmidt re same (.1)

July 8, 2022

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
06/30/22	J. Knapp	0.1	Review court docket for objections to notice of intent to compensate

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
D. Foraker	Partner	0.1	\$630	\$63.00
J. Knapp	Partner	7.4	595	4,403.00
N. Levy	Associate	1.1	380	418.00
H. Harmon	Paralegal	0.4	225	90.00
Summary Total:		9.0		\$4,974.00

Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Washington Secretary of State: Washington annual report filing fees for American Eagle Mortgage 400 LLC and American Eagle Mortgage 600 LLC	120.00
Disbursement Total:	\$120.00

Invoice Summary

Professional Fees Through June 30, 2022	\$4,974.00
Disbursements	\$120.00
Amount Due - Current Period:	\$5,094.00



Clyde A. Hamstreet & Associates, LLC
Attn: Clyde A. Hamstreet
One SW Columbia Street, Suite 1575
Portland, OR 97258

Account: 721921.0017
Adjunct Litigation Claims Against Ross Miles, Maureen Wile, et al.

Invoice: 2189298
July 8, 2022

Invoice Summary

Professional Fees Through June 30, 2022	\$70,423.00
Disbursements	<u>\$1,356.25</u>
Amount Due – Current Period:	<u>\$71,779.25</u>

To pay by wire transfer, route to:

Miller Nash LLP, U.S. Bank National Association
Account # 1536-0646-7352, Routing # 123000220,
Swift Code USBKUS44IMT
Bank address: 321 SW 6th Avenue, Portland, OR 97204

To pay by credit card, use this link:

<https://secure.lawpay.com/pages/millernash/operating>

To pay by check, remit to:

PO Box 3585
Portland, OR 97208-3585

Accounts due and payable in U.S. dollars upon receipt. Please include invoice number with remittance. Invoice may not include all fees and expenses incurred prior to statement closing date. Late charges of .75% per month (9% annually) will accrue on all amounts unpaid after 30 days from date of invoice. Tax ID # 93-0410518.

July 8, 2022

Invoice Detail

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
06/01/22	E. Decker	0.2	Draft response to Riverview Bank's interrogatories
06/01/22	L. Peterson	1.8	Communications with Joseph Vance re documents for expert (.4); continue to prepare documents for expert review based on spreadsheets from Hannah Schmidt (1.4)
06/01/22	J. Vance	0.4	Analyze and organize documents to be provided to expert
06/02/22	E. Decker	1.0	Draft response to Riverview Bank's interrogatories (.9); analyze discovery letter from Pacific Premier Bank's counsel (.1)
06/02/22	D. Foraker	0.2	Review email from Chris Kayser re Pacific Premier Bank's lawsuit against Zurich American Insurance Company over insurance coverage with regard to claims made in AEM receivership adjunct litigation and related AEM investor litigation
06/02/22	N. Miller	0.2	Review Regents Bank emails for relevance to claims
06/02/22	E. Mills	0.8	Summarize and analyze written discovery responses received and served to date
06/02/22	L. Peterson	4.1	Communications with Joseph Vance re discovery and documents for expert review (.3); continue to compile documents for expert review based on emails and spreadsheets from Hannah Schmidt (3.7); email to Gary Stoley with ShareFile link (.1)
06/02/22	J. Vance	3.5	Analyze letter from Shannon Armstrong re discovery (1.0); review and organize documents for expert (1.0); analyze discovery requests from Pacific Premier Bank (1.5)
06/03/22	E. Decker	2.0	Draft response to Riverview Bank's interrogatories
06/03/22	E. Mills	1.5	Summarize and analyze written discovery responses received and served to date

July 8, 2022

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
06/03/22	L. Peterson	5.4	Organize document provided to expert and email to attorneys re same (.2); communications with Edward Decker re supplemental production to Riverview Bank (.1); prepare Riverview Bank policies for expert review and incorporate in ShareFile (.5); email to Joseph Vance re bank policies (.1); compile discovery responses from Ross Miles and Maureen Wile made in response to Riverview Bank discovery requests, review document indices and compile opposing and third party productions, and prepare ShareFile for same (3.3); communications with Joseph Vance re third party productions (.2); email to Edward Decker summarizing receiver's second production of documents in response to Riverview Bank (.3); email to Hannah Schmidt re summary of productions (.2); prepare instructions for transfer of documents produced by Pacific Premier Bank and Riverview Bank pursuant to subpoena to matter database (.5)
06/03/22	J. Vance	3.5	Virtual meeting with Hannah Schmidt and expert (.8); organize and prepare materials for expert (1.5); outline response to interrogatories (1.2)
06/04/22	L. Peterson	3.0	Review deposition of Michael Roberts for use with preparation of chronology
06/06/22	E. Decker	4.6	Draft responses to Riverview Bank's interrogatories (4.4); virtual meeting with Lisa Peterson to discuss upcoming document productions (.2)
06/06/22	H. Harmon	0.4	Prepare attorney notebook of discovery responses from receiver, Pacific Premier Bank, and Riverview Community Bank

July 8, 2022

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
06/06/22	L. Peterson	4.1	Research document collections for September 2008 letter from Michael Roberts and email same to Edward Decker (.3); communications with Joseph Spring re database management (.3); review, research, and respond to email from Hannah Schmidt re document productions (.5); review and analyze Pacific Premier Bank productions from April and June 2020 and provide summary to Joseph Vance (.9); review certain loan files scanned by Streamline into Relativity and prepare instructions to Streamline project management for production on same (1.0); emails with Zachary Larmer re document scanning issues (.5); virtual meeting with Edward Decker to discuss upcoming document productions (.2); update document index (.2); address issues re production of investor files (.2)
06/06/22	J. Vance	2.8	Prepare response to interrogatories
06/07/22	E. Decker	1.8	Virtual meeting with Joseph Vance to discuss upcoming productions and responses to written discovery (.2); virtual meeting with Lisa Peterson to discuss documentary support for responses to Riverview Bank interrogatories (.2); draft responses to Riverview Bank's interrogatories (1.4)
06/07/22	L. Peterson	2.2	Download, organize, and review additional files from Hannah Schmidt for expert (.4); locate Bates numbered copies of bank statements (1.4); telephone call with Joseph Vance re additional documents from Hannah Schmidt (.2); virtual meeting with Edward Decker to discuss documentary support for responses to Riverview Bank interrogatories (.2)
06/07/22	J. Vance	2.0	Virtual meeting with Edward Decker (.2); telephone conference with Lisa Peterson (.2); prepare for virtual meeting with Hannah Schmidt re discovery responses (.6); participate in virtual meeting with Hannah Schmidt re discovery responses (1.0)
06/08/22	E. Decker	1.0	Draft responses to Riverview Bank interrogatories (.8); virtual meeting with Lisa Peterson to discuss details of import of hard-copy documents to database (.2)

July 8, 2022

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
06/08/22	L. Peterson	1.8	Virtual meeting with Edward Decker to discuss details of import of hard-copy documents to database (.2); emails with Streamline Imaging re document scanning issues and adjustments to database (.5); email to Nick Miller re loan file coding (.2); download, organize, and review load file of first production run of loan files out of database (.5); telephone call with Hannah Schmidt re documents for expert (.4)
06/08/22	J. Vance	0.3	Review communications with expert
06/09/22	E. Decker	3.9	Oversee preparation of productions of hard-copy documents (.5); draft responses to Riverview Bank's interrogatories (3.4)
06/09/22	N. Miller	0.4	Code bank lender and AEM contract number to electronic database of AEM loan files
06/09/22	L. Peterson	1.7	Communications with Edward Decker re information for interrogatory responses to Riverview Bank and documents from Hannah Schmidt (.5); search and tag pool offering documents in electronic database (.3); check database for new fields and email to Nick Miller re coding bank lender and AEM contract number to electronic database (.4); review production of loan files as prepared by Streamline, prepare ShareFile, and emails with Edward Decker re same (.5)
06/10/22	E. Decker	2.1	Draft responses to Riverview Bank's interrogatories
06/10/22	E. Mills	1.7	Analyze and summarize written discovery requests and responses from all parties to date
06/10/22	L. Peterson	4.6	Review email from Hannah Schmidt with spreadsheet of Pacific Premier Bank loan files and coordinate with litigation support team to assemble documents (.4); continue to review documents selected by Hannah Schmidt for expert review and prepare Bates numbered versions of certain Riverview Bank documents (3.6); download, organize, and review the additional files from Hannah Schmidt prepared for expert, and email with Hannah Schmidt re same (.5); email to Gary Stoley re additional documents prepared for review (.1)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
06/10/22	J. Vance	0.4	Review emails re document production
06/13/22	E. Decker	3.4	Virtual meeting re bank claims matters (.4); virtual meeting with Joseph Vance to discuss discovery issues (.2); draft responses to Riverview Bank's interrogatories (2.8)
06/13/22	D. Foraker	0.4	Virtual meeting with Chris Kayser, John Stephens, John Rake, Bridget Donegan, Jon Hunt, Hannah Schmidt, Joseph Vance, and Edward Decker re bank claims matters
06/13/22	E. Mills	2.8	Review, analyze, and summarize all written discovery requests and responses to date
06/13/22	L. Peterson	5.5	Review database and email to Streamline Imaging project management to request second production run of loan files (.5); review Pacific Premier Bank loan files prepared for expert and email to Joseph Spring to request addition (.5); review Evergreen Data Systems reports and determine production status (.4); review various document collections provided by Hannah Schmidt for expert review and emails with Edward Decker and Joseph Vance re same (1.0); review, analyze, and prepare produced versions of corporate documents identified by Hannah Schmidt for expert review (3.1)
06/13/22	J. Vance	2.5	Virtual meeting re bank claim matters (.4); virtual meeting with Hannah Schmidt and expert (.8); analyze and organize documents to be produced (1.3)
06/14/22	E. Decker	1.9	Virtual meeting with Joseph Vance and Eric Mills to discuss responses to Riverview Bank's interrogatories and analysis of defendants' discovery responses (.3); confer with Pacific Premier's counsel re productions of hard-copy documents (.5); revise draft responses to Riverview Bank's interrogatories (1.1)
06/14/22	N. Miller	1.3	Code bank lender and AEM contract number to electronic database of AEM loan files

July 8, 2022

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
06/14/22	E. Mills	3.4	Virtual meeting with Joseph Vance and Edward Decker to discuss responses to Riverview Bank's interrogatories and analysis of defendants' discovery responses (.3); review, analyze, and summarize all written discovery to date and plan strategy re obtaining supplemental responses from defendants (3.1)
06/14/22	L. Peterson	1.2	Review email from Hannah Schmidt re Riverview Bank debt ledger from AEI QuickBooks and emails with Joseph Vance re same (.1); telephone call from Joseph Vance re documents for expert review and response to Riverview Bank discovery requests (.5); download and organize documents from ShareFile re line of credit draw requests (.2); add additional documents to ShareFile for expert review (.4)
06/15/22	E. Decker	5.6	Draft responses to Riverview Bank's interrogatories
06/15/22	N. Miller	0.7	Code bank lender and AEM contract number to electronic database of AEM loan files
06/15/22	E. Mills	4.3	Review, analyze, and summarize all written discovery to date and plan strategy re obtaining supplemental responses from defendants
06/15/22	L. Peterson	3.7	Review, research, and respond to communications with Edward Decker re information for responses to Riverview Bank interrogatories (1.5); review and prepare produced versions of line of credit draw requests documents (1.3); update experts ShareFile with draw requests (.2); address issues re electronic database maintenance (.2); review databases for tax documents (.5)
06/15/22	J. Vance	1.8	Review email from Shannon Armstrong re scheduling issues (.4); analyze documents to be produced (.4); analyze documents produced to expert (1.0)
06/16/22	E. Decker	4.9	Draft responses to Riverview Bank's interrogatories (4.6); virtual meeting with Joseph Vance to discuss draft interrogatory responses (.3)

July 8, 2022

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
06/16/22	L. Peterson	8.3	Review, research, and respond to requests from Edward Decker re Pond and Nichols complaints and re daily pool balance spreadsheets (1.0); address electronic database issues (.2); tag daily pool balance spreadsheets for production (.2); continue to review, analyze, and prepare documents for expert's review, incorporate same in ShareFile, and prepare tracking chart (5.6); telephone call from Joseph Vance re QuickBooks files (.2); prepare instructions for inclusion and Bates numbering of liability claims spreadsheet in electronic database (.2); organize additional loan files for production and email ShareFile link to Edward Decker (.5); update document index (.2); prepare instructions for inclusion of EDS reports for re-investments in electronic database (.2)
06/16/22	J. Vance	2.8	Analyze and edit Riverview Bank interrogatory responses (1.5); virtual meeting with Edward Decker (.3); analyze documents provided to expert (1.0)
06/17/22	E. Decker	2.6	Revise draft responses to Riverview Bank's interrogatories (2.0); select documents for additional productions to Riverview Bank (.6)
06/17/22	L. Peterson	4.7	Virtual meeting with Edward Decker re discovery responses (.5); emails with Zachary Larmer re scanning of bank statements (.1); download and organize additional documents from Hannah Schmidt re pool financials (.2); continue to review, analyze, and prepare documents for review by expert (3.5); emails with Hannah Schmidt re documents for expert (.1); communications with Joseph Vance re documents for expert (.3)
06/17/22	J. Vance	1.5	Analyze documents to be shared with expert
06/18/22	J. Vance	0.5	Analyze issues related to damage calculation
06/20/22	J. Vance	3.0	Draft Riverview Bank interrogatory responses

July 8, 2022

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
06/21/22	E. Decker	3.2	Virtual meeting with Joseph Vance and Eric Mills to discuss discovery projects (.3); virtual meeting with Lisa Peterson to discuss ongoing reviews of documents for production (.3); revise draft responses to Riverview Bank's interrogatories (2.0); respond to questions from Pacific Premier's counsel re privileged documents (.6)
06/21/22	E. Mills	0.3	Virtual meeting with Joseph Vance and Edward Decker to discuss discovery projects
06/21/22	L. Peterson	0.7	Virtual meeting with Edward Decker to discuss ongoing reviews of documents for production (.3); email to Zachary Larhmer re status of loan file scanning (.1); obtain assignment of deed of trust (.3);
06/21/22	J. Vance	0.9	Virtual meeting with Edward Decker and Eric Mills to discuss discovery projects (.3); telephone call with expert (.3); review pretrial deadlines proposed by defendants (.3)
06/22/22	E. Decker	1.0	Serve production of hard-copy loan files (.3); virtual meeting with Lisa Peterson to discuss production of hard-copy loan files (.2); correspond with Pacific Premier's counsel re privileged documents (.4); analyze offering documents for pools as part of response to Riverview Bank's interrogatories (.1)
06/22/22	L. Peterson	5.1	Emails with Zachary Larmer re loan file scanning (.1); virtual meeting with Heather Harmon re organization of spreadsheet of documents provided to expert (.3); emails with Hannah Schmidt re status of file scanning and documents for expert (.2); virtual meeting with Edward Decker to discuss production of hard-copy loan files (.2); update ShareFile folder for production of loan files (.2); meeting with Nick Miller re review of emails in database (.2); continue to prepare documents for review by expert and incorporate in ShareFile (3.9)
06/22/22	J. Vance	2.5	Revise and edit Riverview Bank interrogatory responses

July 8, 2022

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
06/23/22	L. Peterson	3.3	Continue to prepare documents for review by expert (2.3); emails to Gary Stoley with ShareFile links to added documents (.2); prepare summary of LLC operating agreements and management agreements by entity (.6); review database and request adjustments to loading of EDS reports (.2)
06/23/22	J. Vance	2.0	Revise Riverview Bank interrogatory responses
06/24/22	E. Decker	2.3	Finalize responses to Riverview Bank's interrogatories for service (1.0); virtual meeting with Lisa Peterson to plan production to Riverview Bank (.7); analyze documents to be produced to Riverview Bank (.6)
06/24/22	H. Harmon	0.2	Finalize supplemental responses to Riverview Bank's discovery requests with client verification and prepare for distribution
06/24/22	L. Peterson	1.1	Communications with Joseph Vance and Heather Harmon re spreadsheet of documents given to expert (.4); virtual meeting with Edward Decker to plan production to Riverview Bank (.7)
06/24/22	J. Vance	2.5	Analyze documents provided to expert
06/27/22	E. Decker	1.6	Revise draft responses to Pacific Premier Bank's interrogatories
06/27/22	D. Foraker	0.2	Series of emails re cancellation of group virtual meeting
06/27/22	L. Peterson	1.8	Email to Gary Stoley with link to response to Riverview Bank discovery requests (.1); review emails in email database for responsiveness to Riverview Bank discovery requests (1.7)
06/27/22	J. Vance	1.5	Analyze discovery issues
06/28/22	E. Decker	0.5	Virtual meeting with Joseph Vance and Eric Mills to discuss responses to defendants' interrogatories and upcoming productions (.3); correspond with Pacific Premier's counsel re interrogatories (.2)

July 8, 2022

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
06/28/22	H. Harmon	0.1	Finalize sixth supplemental responses to Pacific Premier Bank's first interrogatories and prepare for distribution
06/28/22	N. Miller	0.9	Review and analyze Hamstreet email correspondence for responsiveness
06/28/22	E. Mills	0.3	Virtual meeting with Joseph Vance and Edward Decker
06/28/22	L. Peterson	3.5	Respond to question from Nick Miller re review of emails in database (.3); review and tag for production EDS reports (.2); continue to review and analyze emails with Riverview Bank for responsiveness to discovery requests (3.0)
06/28/22	J. Vance	1.5	Analyze discovery issues (1.2); virtual meeting with Edward Decker and Eric Mills to discuss responses to defendants' interrogatories and upcoming productions (.3)
06/29/22	L. Peterson	3.4	Review email from Hannah Schmidt re additional Pacific Premier Bank files added to ShareFile (.1); organize, review, and amend file names for additional Pacific Premier Bank files (.5); email to Joseph Vance re Pacific Premier Bank files (.1); emails with Hannah Schmidt re spreadsheet from QuickBooks and certain Pacific Premier Bank statements, export statements from database, and incorporate documents in expert ShareFile (.9); emails to Gary Stoley with links to additional documents (.2); continue to review and analyze Riverview Bank emails for production (1.4); emails from Hannah Schmidt re Mike Roberts and Terry Metz emails (.1); email to Joseph Vance re Riverview Bank emails (.1)
06/29/22	J. Vance	1.5	Review and approve stipulation and order re pre-trial deadlines (.3); review documents provided to expert (1.2)
06/30/22	E. Decker	0.3	Virtual meeting with Lisa Peterson to discuss ongoing review of hard-copy documents and planned productions

July 8, 2022

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
06/30/22	L. Peterson	3.6	Email with Heather Harmon re receiver productions (.2); email to Hannah Schmidt re Riverview Bank emails (.1); incorporate additional documents concerning pool financials to ShareFile and email link to Gary Stoley (.3); review bank statements in database (.5); telephone call with Zachary Larmer re bank statement coding (.1); virtual meeting with Edward Decker to discuss ongoing review of hard-copy documents and planned productions (.3); continue to review and analyze emails with Riverview Bank for production (2.1)
06/30/22	J. Vance	0.7	Telephone conference with expert (.2); analyze documents to be provided to expert (.5)

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
D. Foraker	Partner	0.8	\$630	\$504.00
J. Vance	Partner	38.1	550	20,955.00
E. Decker	Partner	43.9	475	20,852.50
E. Mills	Associate	15.1	410	6,191.00
L. Peterson	Paralegal	74.6	280	20,888.00
N. Miller	Paralegal	3.5	250	875.00
H. Harmon	Paralegal	0.7	225	157.50
Summary Total:		176.7		\$70,423.00

Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Streamline Imaging: Project Management/Relativity Database May 2022	1,356.25
Disbursement Total:	\$1,356.25

Invoice Summary

Professional Fees Through June 30, 2022	\$70,423.00
Disbursements	\$1,356.25
Amount Due - Current Period:	<u>\$71,779.25</u>

EXHIBIT C



CREATIVE | DIGITAL | PUBLIC RELATIONS

INVOICE

Gard Communications
1140 SW 11th, Suite 300
Portland, OR 97205

Hannah Schmidt
Hamstreet & Associates - AEM
General Receiver in American Eagle Mortgage

Number	14278
Date	06/30/22
Job Number	AEM-003
PO#	--
Charge#	--

Job Name: Microsite Updates & Maintenance

Agency Contact: Brian Gard

Description: For Professional Services Rendered Through June, 2022:

Description	Hours Billed	Amount
Account Services	1.80	\$277.50
Professional Services Subtotal:	1.80	\$277.50
Back end development	0.25	\$43.75
Interactive Subtotal:	0.25	\$43.75
TOTAL:	2.05	\$321.25

PAYMENT TERMS: net 30 days



Invoice Detail Report

Invoice : 14278 Client : Hamstreet & Associates - AEM (AEM)

07/06/22 4:46 PM
(TY)

Reference: Date: Vendor/Staff: Hours: Billed:

AEM-003 Microsite Updates & Maintenance

Account Services:				Rate	Hrs	Amount
379178	06/01/22	NK <i>Website help & emails</i>	Naureen Khan	\$175.00	0.20	\$35.00
379554	06/07/22	TY <i>Account administration</i>	Teri Yamauchi	\$100.00	0.50	\$50.00
380437	06/07/22	NK <i>Document upload, edit and client emails</i>	Naureen Khan	\$175.00	0.30	\$52.50
380345	06/16/22	NK <i>Document upload</i>	Naureen Khan	\$175.00	0.20	\$35.00
380866	06/17/22	NK <i>Client emails</i>	Naureen Khan	\$175.00	0.20	\$35.00
381012	06/24/22	NK <i>Document upload</i>	Naureen Khan	\$175.00	0.30	\$52.50
381053	06/27/22	NK <i>Document adjustment</i>	Naureen Khan	\$175.00	0.10	\$17.50
					1.80	\$277.50

Back end development:				Rate	Hrs	Amount
379167	06/01/22	AP <i>Remove contact form</i>	Arthur Parker	\$175.00	0.25	\$43.75
					0.25	\$43.75

AEM-003 TOTAL 2.05 \$321.25

INVOICE #14278 TOTAL: 2.05 \$321.25

EXHIBIT D

Rosen Law, S.C.
 Plaza Los Portales Local 205
 San Jose del Cabo, Baja California Sur
 Mexico 23406



Clyde A. Hamstreet & Associates, LLC, as AEM Receiver

Att'n: Mr. Clyde A. Hamstreet
 One SW Columbia Street, Suite 1575
 Portland, OR 97258
 United States
 Phone: 503.224.5858

Invoice Date	Invoice Number
06/30/2022	22407
Terms	Service Through
	06/30/2022

In Reference To: EAST CAPE G&A (Legal fees)					
Date	By	Services	Hours	Rates	Amount
06/02/2022	DV/LB	Team Call	0.50	\$ 50.00/hr	\$ 25.00
06/02/2022	DV/LB	Preparing and sharing Quotes for approval : Lotifications and Technical Decision MDP & TS	0.30	\$ 50.00/hr	\$ 15.00
06/07/2022	BR	Communications: internal re: closing cost estimates, public registry matters.	0.35	\$ 350.00/hr	\$ 122.50
06/16/2022	DV/LB	meeting with Notary re: registration of Trust Deed	2.00	\$ 50.00/hr	\$ 100.00
06/22/2022	DV/LB	Prepare PTT Lot 21	1.00	\$ 50.00/hr	\$ 50.00
Total Hours					4.15 hrs
Total Legal fees					\$ 312.50
Total Amount					\$ 312.50

In Reference To: General (Legal fees)					
Date	By	Services	Hours	Rates	Amount
06/01/2022	BR	Communications: Re: Villa la Montana closing. Review closing docs.	1.00	\$ 350.00/hr	\$ 350.00
06/01/2022	DV/LB	Villa Montaña Closing: reviewing draft deed	1.00	\$ 100.00/hr	\$ 100.00
06/02/2022	BR	Review: final draft of deed Re: Villa la Montana closing. Communications parties.	0.75	\$ 350.00/hr	\$ 262.50
06/03/2022	DV/LB	Villa Montaña Closing: coordinating timing, disbursement and commission bills	1.00	\$ 100.00/hr	\$ 100.00
06/03/2022	DV/LB	Sea Breeze closing: coordinating apostille-request shipment to Sacramento Secretary of State	1.00	\$ 100.00/hr	\$ 100.00

06/07/2022	DV/LB	Review payments Closing Valerio: emails with Notary, draft chart, review all payments	3.00	\$ 100.00/hr	\$ 300.00
06/17/2022	LA	Review emails on comments to the power of attorney of Mr. Rosen by the Notary. Respond email to Notary 7 on the foregoing with assessment on the document. Email with Daniela Velazquez on the foregoing.	0.60	\$ 195.00/hr	\$ 117.00
06/20/2022	BR	Meeting: notary and closing attorney to execute definitive Villa Montana conveyance deed. Diverse communications all parties re: same. Review and comment on closing docs. Confer with Daniela.	1.50	\$ 350.00/hr	\$ 525.00
06/20/2022	BR	Communications: Daniela, notary re: Mar de Plata tax letter from City. Study options.	0.40	\$ 350.00/hr	\$ 140.00
06/21/2022	BR	Communications: Meeting notary to execute VLM deed; review draft. Execute related closing docs. Diverse communications all parties,	1.00	\$ 350.00/hr	\$ 350.00
06/22/2022	BR	Follow up: and communications parties' re: closing and disbursements.	0.30	\$ 350.00/hr	\$ 105.00
06/23/2022	DV/LB	Villa Montaña Closing: coordinate and prepare Tax File	1.50	\$ 100.00/hr	\$ 150.00
06/30/2022	BR	Local Management & Banking Support (AEMEMMX S DE RL DE CV) June, 2022	Flat Fee	\$ 200.00	\$ 200.00

Total Hours 13.05 hrs
Total Legal fees \$ 2,799.50
Total Amount \$ 2,799.50

In Reference To: Mar de Plata Consumer Docs & Dev Legal (Legal fees)

Date	By	Services	Hours	Rates	Amount
06/16/2022	BR	Conference call: Hannah, Valerio and Jim re: CC&Rs, Design & Construction Guidelines and Promise of Trust	1.00	\$ 350.00/hr	\$ 350.00
06/27/2022	BR	Draft: revisions to construction regs and CC&Rs. Email to client.	2.00	\$ 350.00/hr	\$ 700.00

Total Hours 3.00 hrs
Total Legal fees \$ 1,050.00
Total Amount \$ 1,050.00

Total Hours	20.20 hrs
Total Legal fees	\$ 4,162.00
Total Invoice Amount	\$ 4,162.00

Notes:

Thank you in advance for your prompt payment.