

E-FILED

08-16-2022, 10:00

Honorable D: **Scott G. Weber, Clerk**
Clark County

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8 SUPERIOR COURT OF WASHINGTON FOR CLARK COUNTY

9 In re:

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.

Case No. 19-2-01458-06
RECEIVER'S NOTICE OF INTENT TO
COMPENSATE (JULY 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
(JULY 2022) - 1

4863-9770-2955.1

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 (July 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 July 2022. For this period, the Receiver requests final
15 approval of its compensation in the amount of \$26,568.50 and reimbursement of costs of
16 \$112.50, for a total payment of \$26,681.00.

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 July 2022. For
19 this period, such attorneys request final approval of their compensation in the amount of
20 \$53,566.00 and reimbursement of costs of \$1,353.98, for a total payment of \$54,919.98.

21 Attached as Exhibit C hereto is a true and correct copy of the time and expense summary
22 of the Receiver’s authorized forensic accountants Specialized Forensic Investigations LLC, for
23 services and costs in July 2022. For this period, such forensic accountants request final approval
24 of their compensation in the amount of \$1,470.00 and reimbursement of no costs, for a total
25 payment of \$1,470.00.

26

1 Attached as Exhibit D hereto is a true and correct copy of the time and expense summary
2 of the Receiver's authorized forensic accountant Michael G. Ueltzen, CPA, for services and costs
3 in July 2022. For this period, such forensic accountant requests final approval of his
4 compensation in the amount of \$4,590.00 and reimbursement of no costs, for a total payment of
5 \$4,590.00.

6 Attached as Exhibit E hereto is a true and correct copy of the time and expense summary
7 of the Receiver's authorized public communications consultants, Gard Communications, Inc., for
8 services and costs in July 2022. For this period, such consultants request final approval of their
9 compensation in the amount of \$137.50 and reimbursement of no costs, for a total payment of
10 \$137.50.

11 Attached as Exhibit F hereto is a true and correct copy of the time and expense summary
12 of the Receiver's authorized special counsel in Mexico, Rosen Law, S.C., for services and costs
13 in July 2022. For this period, such attorneys request final approval of their compensation in the
14 amount of \$2,020.00 and reimbursement of costs of \$477.66, for a total payment of \$2,497.66.

15 Unless objections to the foregoing requests are filed with the Court and served on the
16 undersigned attorneys so as to be received by August 29, 2022, the Receiver may make the
17 payments requested herein and/or the professionals may apply their retainers, if any.

18 DATED this 16th day of August, 2022.

19 MILLER NASH LLP

20
21 /s/ John R. Knapp, Jr.
22 John R. Knapp, Jr., P.C., WSB No. 29343

23 Attorneys for Receiver
24 Clyde A. Hamstreet & Associates, LLC
25
26

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

August 15, 2022

Invoice # 2560

Professional Services

		<u>Hours</u>	<u>Amount</u>
6/6/2022	MA Receivership Duties Email Walt Snyder for an update on the property cleanup.	0.10	32.50
6/28/2022	MA Receivership Duties Reply to email from DJ at Alternate Electric; batteries were installed on 6/21; waiting for DJ's update on the well testing and other onsite work he performed. Send follow-up email to Walt Snyder requesting status of river flooding and whether the ground is drying out. Send summary status email to Hannah Schmidt.	0.10	32.50
6/29/2022	MA Receivership Duties Email update to Hannah Schmidt regarding the electrical work completed by Alternate Electric.	0.10	32.50
7/1/2022	MA Receivership Duties Review Alternate Electric invoice and forward to Hannah Schmidt for payment.	0.10	32.50
	CAH Receivership Duties Call with Edward Decker, Joe Vance, Hannah Schmidt and Stoley team.	1.00	600.00
	HS Litigation Support Call with Joe Vance, Edward Decker, Clyde Hamstreet and Stoley team about progress to date. Prepare and follow-up regarding same.	2.60	1,196.00
7/5/2022	HS Investor Relations Call with Rid III investor's attorney.	0.50	230.00
	HS Receivership Duties Read and respond to emails. Download bank statements.	0.50	230.00
	HS Litigation Support Call with David Foraker, Clyde Hamstreet and Joe Vance regarding banking experts and distributions.	0.50	230.00

			<u>Hours</u>	<u>Amount</u>
7/5/2022	CAH	Receivership Duties Meeting with David Foraker, Joe Vance and Hannah Schmidt regarding banking experts.	0.50	300.00
7/6/2022	CAH	Receivership Duties Review progress on liquidation of Mexico properties and approve wire for payment of legal expenses.	0.60	360.00
7/7/2022	HS	Receivership Duties Read and respond to emails.	0.50	230.00
	HS	Pacific Premier Bank Calls with Joe Vance and Maren Cohn regarding interrogatories. Review draft letter to Holland & Knight.	0.60	276.00
	HS	Receivership Duties Review Evergreen reconciliation and send comments to Felicia Muli.	0.70	322.00
7/8/2022	HS	Receivership Duties Work on Q2 reporting.	1.80	828.00
	HS	Litigation Support Review recent email production.	2.50	1,150.00
	HS	Receivership Duties Review May Evergreen reconciliation and send comments to Felicia Muli.	0.40	184.00
7/11/2022	HS	Litigation Support Meet with Joe Vance, Paul Artley, Mike Ueltzen to discuss damages expert.	1.00	460.00
7/12/2022	HS	Litigation Support Call with SEC and John Knapp to status update.	0.20	92.00
	HS	Investor Relations Calls and emails regarding investor questions.	0.50	230.00
	HS	Litigation Support Work on addressing questions from the Stoely group.	3.50	1,610.00
	HS	Litigation Support Prepare for and call with Mike Ueltzen and Paul Artley regarding damages.	1.50	690.00
7/13/2022	HS	Receivership Duties Read and respond to emails.	0.40	184.00
	HS	Litigation Support Review information for damages estimate.	1.00	460.00
	HS	Litigation Support Work on addressing questions from the Stoely group.	1.10	506.00
7/14/2022	HS	Investor Relations Call and follow up email to Chris Bugas.	0.40	184.00

			<u>Hours</u>	<u>Amount</u>
7/14/2022	HS	Receivership Duties Call with Daniela Velazquez and Evelyn Torres regarding Mexico development.	0.30	138.00
7/15/2022	MA	Receivership Duties Email to Walt Snyder requesting an update on the dumpsters.	0.10	32.50
7/18/2022	HS	Receivership Duties Work on quarterly reporting.	7.50	3,450.00
	MA	Receivership Duties Review update from Walt Snyder on the property cleanup; email status update to Hannah Schmidt.	0.10	32.50
7/19/2022	CAH	Receivership Duties Review contact basis for AEM related contacts for attorneys. Administrative work.	0.30	180.00
	HS	Receivership Duties Read and respond to emails.	0.30	138.00
	HS	Litigation Support Review email list for production. Calls regarding Pacific Premier subpoena to Wendy Hamann.	2.00	920.00
7/20/2022	HS	Litigation Support Call with Mike Ueltzen, Paul Artley and Joe Vance regarding damages. Follow up work to get data to Mike Ueltzen and Paul Artley for analysis. Finish review of emails for Edward Decker.	6.00	2,760.00
7/25/2022	HS	Litigation Support Call with class action team.	0.20	92.00
	HS	Receivership Duties Emails regarding lot 22 sale.	0.20	92.00
	HS	Pacific Premier Bank Call with Edward Decker regarding production.	0.40	184.00
	HS	Litigation Support Call with Rod Werhan.	0.70	322.00
7/26/2022	HS	Receivership Duties Work on draft of quarterly reporting and email to John Knapp and David Foraker for review.	2.50	1,150.00
	CAH	Receivership Duties Discuss with Hannah Schmidt expert findings and productions status; review of investor comments and other documents requested by banks' counsel.	0.70	420.00

		<u>Hours</u>	<u>Amount</u>
7/26/2022	HS Pacific Premier Bank Review paper documents for Pacific Premier Bank. Calls with Edward Decker regarding same. Discuss litigation status with Clyde Hamstreet.	4.00	1,840.00
7/27/2022	HS Litigation Support Read and respond to emails.	0.50	230.00
	MA Receivership Duties Call with Walt Snyder on property cleanup status; email status updated to Hannah Schmidt.	0.10	32.50
7/28/2022	HS Receivership Duties Call with Daniela Velazquez regarding Mar de Plata sales.	0.20	92.00
	HS Riverview Bank Call with Rod Werhan regarding questions.	0.30	138.00
7/29/2022	HS Litigation Support Call with Barbara Jacobs regarding project and return of files to storage unit.	0.30	138.00
	HS Pacific Premier Bank Review the results of email query and forward to Miller Nash.	0.30	138.00
	HS Litigation Support Research questions from Stoley group.	1.50	690.00
	HS Litigation Support Review scanning for specific files. Calls and emails with Lisa Peterson and Edward Decker regarding same.	2.00	920.00
7/31/2022	FM Administrative Services Bank reconciliation for April, May and June.	6.50	975.00
	HS Litigation Support Review production, address question from Bridget Donegan. Read and respond to emails.	1.70	782.00
For professional services rendered		61.40	\$26,568.50

Additional Charges :

	<u>Price</u>	<u>Qty</u>	
7/27/2022 Online support email search query.	\$112.50	1	112.50
Total additional charges			\$112.50

Total amount of this bill

\$26,681.00

Accounts receivable transactions

8/8/2022 Payment Invoice #2555 - Thank You. Check No. 1629 (\$23,429.00)

	Amount
Total payments and adjustments	(\$23,429.00)
Balance due	\$26,681.00

Name	Consultant Summary	Hours	Rate	Amount
Clyde A. Hamstreet - Principal		3.10	600.00	\$1,860.00
Hannah Schmidt - Consultant		51.10	460.00	\$23,506.00
Matthew Alford - Consultant		0.70	325.00	\$227.50
Felicia Muli		6.50	150.00	\$975.00

EXHIBIT B

Client.Matter	Description	Bill Amt	Fees	Costs	Bill Num
721921.0001	American Eagle Mortgage Investment Funds	\$5,361.50	\$5,361.50	\$0.00	2191321
721921.0017	Adjunct Litigation Claims Against Ross Miles, Maureen Wile, et al.	\$48,740.98	\$46,387.00	\$2,353.98	2191336
721921.0019	Investigation of Adjunct Litigation Claims Against AEI/AEMM Lenders	\$817.50	\$1,817.50	-\$1,000.00	2191335
		\$54,919.98	\$53,566.00	\$1,353.98	



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: 2191321
August 4, 2022

Invoice Summary

Professional Fees Through July 31, 2022	\$5,361.50
Disbursements	<u>\$0.00</u>
Amount Due – Current Period:	<u>\$5,361.50</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.

Invoice Detail

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/01/22	J. Knapp	0.4	Review court docket (.2); emails with Hannah Schmidt re no objections to notice of intent to compensate (May 2022) (.2)
07/05/22	J. Knapp	0.3	Emails with Rosen Law billing department re notice of intent to compensate (June 2022) (.1); draft notice of intent to compensate (June 2022) (.2)
07/05/22	N. Levy	0.1	Email with Hannah Schmidt re release of trust deed in Harris County, Texas
07/06/22	J. Knapp	0.7	Continue drafting notice of intent to compensate (June 2022) (.5); emails with Michael Ueltzen re notice of intent to compensate (June 2022) (.1); emails with Teri Yamauchi re notice of intent to compensate (June 2022) (.1)
07/07/22	D. Foraker	0.2	Emails with Hannah Schmidt re receiver's twelfth quarterly report
07/07/22	J. Knapp	0.2	Email from Clyde Hamstreet re SEC meeting (.1); email from Hannah Schmidt re receiver's twelfth quarterly report (.1)
07/08/22	J. Knapp	0.8	Continue drafting notice of intent to compensate (June 2022) (.6); emails with Veronica Hamstreet re notice of intent to compensate (June 2022) (.2)
07/12/22	J. Knapp	0.9	Telephone conference with Rob Durham, Crystal Boodoo, and Hannah Schmidt re SEC update (.3); finalize notice of intent to compensate (June 2022) (.4); email communications with Naureen Khan re transmittal of notice of intent to compensate (June 2022) for posting on website (.2)
07/20/22	H. Harmon	0.1	Obtain copy of docket report and complaint for federal case filed by Securities and Exchange Commission against American Equities defendants for attorney review
07/20/22	J. Knapp	0.3	Emails with Hannah Schmidt re receiver's quarterly report

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/25/22	J. Knapp	0.1	Review court docket
07/26/22	D. Foraker	0.7	Review drafts of receiver's twelfth quarterly report and related emails
07/26/22	J. Knapp	3.3	Review and comment on drafts of receiver's twelfth quarterly report and related emails with Hannah Schmidt and David Foraker (2.2); review court docket (.1); emails with Hannah Schmidt re no objections to notice of intent to compensate (June 2022) (.2); emails with Michael Ueltzen re notice of intent to compensate (July 2022) (.2); draft notice of filing of quarterly report (.3); draft notice of intent to compensate (July 2022) (.3)
07/28/22	J. Knapp	0.3	Finalize notice of filing of quarterly report
07/29/22	J. Knapp	0.4	Arrange for filing and service of notice of filing of quarterly report (.2); email communications with Naureen Khan re transmittal of notice of filing of quarterly report for posting to website (.2)
07/31/22	B. Dickey	0.5	Prepare and file Washington Secretary of State annual reports for American Eagle Mortgage 500, LLC, American Eagle Mortgage Mexico 200, LLC, American Eagle Mortgage Mexico 400, LLC, and American Eagle Mortgage Mexico 600, LLC

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
D. Foraker	Partner	0.9	\$630	\$567.00
J. Knapp	Partner	7.7	595	4,581.50
N. Levy	Associate	0.1	380	38.00
B. Dickey	Paralegal	0.5	305	152.50
H. Harmon	Paralegal	0.1	225	22.50
Summary Total:		9.3		\$5,361.50

Account: 721921

Invoice: 2191321

August 4, 2022

Invoice Summary

Professional Fees Through July 31, 2022	\$5,361.50
Disbursements	<u>\$0.00</u>
Amount Due - Current Period:	<u>\$5,361.50</u>



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: 2191336
August 4, 2022

Invoice Summary

Professional Fees Through July 31, 2022	\$46,387.00
Disbursements	\$2,353.98
Amount Due – Current Period:	<u>\$48,740.98</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.

Invoice Detail

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/01/22	E. Decker	1.5	Virtual meeting with Clyde Hamstreet, Hannah Schmidt, Joseph Vance, and expert team re experts' preliminary analysis
07/01/22	D. Foraker	0.1	Emails with Hannah Schmidt, Clyde Hamstreet, and Joseph Vance re meeting to discuss banking expert information matters
07/01/22	L. Peterson	1.8	Review and analyze scanned bank statements for production (1.4); emails with Edward Decker re bank statements (.1); email to Streamline Imaging with instructions for production run on bank statements (.3)
07/01/22	J. Vance	2.3	Prepare for virtual meeting re experts' preliminary analysis (.8); participate in virtual meeting re experts' preliminary analysis (1.5)
07/05/22	E. Decker	1.8	Virtual meeting with Joseph Vance and Eric Mills to discuss discovery projects, expert witness analysis, and planned depositions (.4); virtual meeting and communications with Lisa Peterson to discuss document productions and review (.5); telephone conference with counsel for Pacific Premier Bank re Pacific Premier Bank's discovery responses (.2); review proposed production of emails with Riverview Community Bank (.4); strategize means to reduce review population of receiver's emails (.3)
07/05/22	D. Foraker	0.5	Virtual meeting with Clyde Hamstreet, Hannah Schmidt, and Joseph Vance re banking experts and other trial preparation matters
07/05/22	E. Mills	0.4	Virtual meeting with Joseph Vance and Edward Decker to discuss discovery projects, expert witness analysis, and planned depositions

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/05/22	L. Peterson	2.3	Review production run by Streamline Imaging of bank statements and emails with Jason Walton re revisions (1.0); review, analyze, and organize emails re daily pool balances (.8); virtual meeting and communications with Edward Decker re document productions (.5)
07/05/22	J. Vance	2.5	Virtual meeting with Clyde Hamstreet, Hannah Schmidt, and David Foraker (.5); virtual meeting with Edward Decker and Eric Mills (.4); analyze documents and information to be produced (1.6)
07/06/22	E. Decker	1.5	Analyze proposed productions (.4); virtual meeting with Lisa Peterson to discuss planned production of Riverview Community Bank materials (.2); correspond with Pacific Premier Bank's counsel re hard-copy documents (.3); review draft response letter to Pacific Premier Bank's questions on discovery responses (.4); strategize means to reduce review population of receiver's emails (.2)
07/06/22	L. Peterson	2.5	Review and respond to email from Joseph Vance re Riverview Community Bank and Pacific Premier Bank emails compiled for expert review (.1); virtual meeting with Edward Decker to discuss planned production of Riverview Community Bank materials (.2); search email database for all emails with Greg Usselman, and prepare instructions for export of documents (.8); prepare instructions for production run of Riverview Community Bank emails and emails with Skyler Helsley re same (.9); prepare instructions for production run of certain daily pool balance spreadsheets (.4); emails to Joseph Vance and expert re Riverview Community Bank emails (.1);
07/06/22	J. Vance	2.5	Prepare letter to Shannon Armstrong re Pacific Premier Bank discovery matters
07/07/22	E. Decker	0.5	Analyze new document requests from Pacific Premier Bank (.3); analyze emails collected from receiver (.2)
07/07/22	H. Harmon	0.3	Update case file and docketing with Pacific Premier Bank's third set of requests for production and prepare response template with standard objections

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/07/22	L. Peterson	3.7	Review export of Greg Usselman emails, email to Joseph Spring re additions, and finalize for expert review (.8); resolve issues and finalize production of emails with Riverview Community Bank (1.1); communications with Joseph Vance re Greg Usselman emails and Riverview Community Bank emails (.5); update ShareFile with additional documents for review by expert (.6); email to expert with links to Greg Usselman emails and Riverview Community Bank emails (.2); email to Heather Harmon re updates for spreadsheet of documents provided to expert (.2); finalize production of certain daily pool balance spreadsheets (.3)
07/07/22	J. Vance	1.2	Revise and edit letter to Shannon Armstrong re Pacific Premier Bank discovery matters
07/08/22	E. Decker	0.8	Analyze email from Pacific Premier's counsel re discovery questions (.5); finalize and serve production to opposing counsel (.3)
07/08/22	H. Harmon	0.1	Prepare notice of unavailability for Joseph Vance
07/08/22	L. Peterson	1.1	Review production runs and address issues with Skyler Helsley (.4); communications with Edward Decker re production of documents (.5); review email from Annie Banks re receiver's responses to document productions (.2)
07/08/22	J. Vance	0.6	Review communications from Pacific Premier Bank re discovery matters
07/11/22	E. Decker	1.8	Virtual meeting with Joseph Vance, Lisa Peterson, and Eric Mills to discuss discovery inquiries from Pacific Premier Bank and planned productions and email in response to it (.7); virtual meeting re update on investor lawsuits and re bank discovery matters (.3); virtual meeting with Lisa Peterson and Nick Miller to discuss ongoing review and production projects (.4); analyze discovery issues raised in email from Pacific Premier Bank (.4)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/11/22	D. Foraker	0.3	Virtual meeting with Mike Esler, John Stephens, John Rake, Bridget Donegan, Joseph Vance, and Edward Decker re update on status of investor lawsuits and re bank discovery matters
07/11/22	H. Harmon	0.1	Prepare notice of unavailability for electronic filing and distribution
07/11/22	N. Miller	1.6	Review and analyze receiver email collection suitable for responsiveness
07/11/22	E. Mills	1.2	Review and analyze email from counsel for Pacific Premier Bank re discovery inquiries (.2); virtual meeting with Joseph Vance, Edward Decker, and Lisa Peterson (.7); draft letter to counsel for Pacific Premier Bank re deficient and outstanding discovery responses from Pacific Premier Bank (.3)
07/11/22	L. Peterson	3.7	Virtual meeting with Edward Decker and Nick Miller to discuss ongoing review and production projects (.4); continue to review and analyze email from Annie Banks and determine production status of documents requested (.6); communications with Joseph Vance and Edward Decker re document productions (.1); virtual meeting with Joseph Vance, Edward Decker, and Eric Mills to discuss discovery inquiries from Pacific Premier Bank and planned productions and email in response to it (.7); email to Heather Harmon re collection of deposition transcripts requested by Annie Banks (.1); organize and prepare ShareFile of other document productions requested by Annie Banks (1.2); emails with Edward Decker re documents ready for production (.3); compare Pacific Premier Bank search terms previously run to new set requested by Annie Banks (.3)
07/11/22	J. Vance	4.5	Virtual meeting with Edward Decker, Lisa Peterson, and Eric Mills (.7); virtual meeting re update on investor lawsuits and re bank discovery matters (.3); virtual meeting with Hannah Schmidt and experts (1.0); analyze and respond to questions re discovery (1.0); telephone conference with expert (.4); analyze calculation of damages (1.1)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/12/22	E. Decker	1.3	Virtual meeting with Lisa Peterson to discuss productions to Pacific Premier Bank (.7); send productions to Riverview Community Bank and Pacific Premier Bank (.4); continue analysis of receiver's emails to reduce review population (.2)
07/12/22	N. Miller	0.5	Review and analyze receiver email collection for responsiveness
07/12/22	L. Peterson	4.0	Virtual meeting with Nick Hughes to discuss receiver email review issues (.4); review deposition transcripts requested by Annie Banks and load in ShareFile (.2); review and analyze bank statements for response to Pacific Premier Bank discovery requests (1.3); virtual meeting with Edward Decker to discuss productions to Pacific Premier Bank (.7); email to Streamline Imaging with instructions for next production of loan files, review production, and organize in ShareFile (.7); update document index (.2); emails with Karri Speck to address access issue with seventh production of documents from Pacific Premier Bank (.2); review email from Sarah Houser with email address report and communications with Nick Miller re same (.3)
07/13/22	L. Peterson	2.2	Emails with Karri Speck and work with IT to resolve issues with access to Pacific Premier Bank's seventh production (.5); review email from Hannah Schmidt re additional documents for expert (.1); download, organize, and review documents in preparation for sharing with expert (1.6)
07/14/22	E. Decker	0.2	Serve production of scanned hard-copy documents on defendants' counsel
07/14/22	N. Miller	1.0	Review and analyze receiver email collection for responsiveness

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/14/22	L. Peterson	3.2	Review and prepare certain collateral files from AEM records and identify Bates numbered versions to provided to expert (1.5); prepare instructions for inclusion of certain collateral files in electronic database (.3); prepare ShareFile for next production of loan files from database (.3); emails with Karri Speck re Pacific Premier Bank's seventh production (.1); download and organize Pacific Premier Bank's seventh production and prepare instructions for inclusion of same in electronic database (.8); update document index (.1); emails with Hannah Schmidt re expert Share (.1)
07/15/22	N. Miller	0.7	Review and analyze receiver email collection for privilege
07/16/22	J. Vance	0.5	Review and respond to communications re document production
07/18/22	E. Decker	2.0	Draft response to Pacific Premier Bank's inquiries on discovery issues
07/18/22	E. Mills	2.4	Research and analyze case law re need to provide privilege log for communications after litigation commences (.9); draft and revise letter to counsel for Pacific Premier Bank re deficient and outstanding discovery responses (1.5)
07/18/22	J. Vance	0.8	Analyze discovery issues
07/19/22	E. Decker	2.8	Respond to Pacific Premier Bank's correspondence on open discovery items (1.4); review draft letter to Pacific Premier Bank on its outstanding discovery (.3); virtual meeting with Joseph Vance and Eric Mills to discuss responses to Pacific Premier Bank's discovery requests and upcoming depositions (.3); oversee review and production of documents in response to Pacific Premier Bank's requests (.8)
07/19/22	E. Mills	0.6	Virtual meeting with Joseph Vance and Edward Decker to discuss responses to Pacific Premier Bank's discovery requests and upcoming depositions (.3); revise draft letter to counsel for Pacific Premier Bank re outstanding and deficient discovery responses (.3)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/19/22	J. Vance	2.5	Virtual meeting with Edward Decker and Eric Mills (.3); exchange communications with defendants re deposition scheduling (.3); analyze issues for depositions (1.9)
07/20/22	E. Decker	0.9	Virtual meetings with Nick Miller and Lisa Peterson to discuss review and production of receiver's emails
07/20/22	H. Harmon	0.4	Prepare notice of deposition, deposition subpoena, and acceptance of service for Greg Usselman
07/20/22	L. Peterson	4.6	Virtual meetings with Nick Miller and Edward Decker to discuss review and production of receiver's emails (.9); brief review of Pacific Premier Bank's production of documents and communications with Joseph Vance with summary and discussion re next steps (.8); review Streamline Imaging invoice and email to Joseph Vance for approval (.1); prepare instructions for production run for miscellaneous collateral files (.2); prepare ShareFile for Pacific Premier Bank production and email link to Hannah Schmidt (.4); continue to prepare miscellaneous collateral files for production and provide ShareFile link to expert (.7); review, analyze, and prepare index of Pacific Premier Bank's production of documents (1.5)
07/20/22	J. Vance	2.5	Virtual meeting with Hannah Schmidt and experts (.5); emails with defendants re deposition scheduling (.4); analyze documents produced by Pacific Premier Bank (1.6)
07/21/22	L. Peterson	0.4	Review metadata provided with Pacific Premier Bank's seventh document production and emails with Joseph Spring to request adjustments to database field coding
07/21/22	J. Vance	0.9	Virtual meeting with Clyde Hamstreet, Hannah Schmidt and expert
07/22/22	H. Harmon	0.5	Prepare correspondence to Arnold Willing re deposition subpoena to Greg Usselman (.1); finalize deposition notice materials and prepare for distribution with witness fee check (.3); coordinate court reporter and radiographer services (.1)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/22/22	L. Peterson	1.6	Continue to review, analyze, and prepare index of Pacific Premier Bank's production of documents
07/22/22	J. Vance	0.6	Review email from Pacific Premier Bank re discovery (.3); finalize subpoena and notice for Greg Usselman deposition (.3)
07/23/22	L. Peterson	2.0	Continue to review, analyze, and prepare index of Pacific Premier Bank's production of documents
07/24/22	L. Peterson	2.0	Continue to review, analyze, and prepare index of Pacific Premier Bank's production of documents
07/24/22	J. Vance	0.3	Email to Shannon Armstrong re Pacific Premier Bank discovery matters
07/25/22	E. Decker	2.1	Virtual meeting with Joseph Vance, Lisa Peterson, and Eric Mills to discuss upcoming conferral with Pacific Premier Bank and planned productions (.4); virtual meeting re updates on discovery matters (.3); telephone conference with Hannah Schmidt to discuss searches of receiver's emails and searches of hard-copy documents (.5); draft responses and objections to Pacific Premier Bank's third set of requests for production (.9)
07/25/22	D. Foraker	0.3	Virtual meeting with John Stephens, Jon Hunt, John Rake, Hannah Schmidt, and Edward Decker re updates on discovery matters
07/25/22	E. Mills	0.4	Virtual meeting with Joseph Vance, Edward Decker, and Lisa Peterson to discuss upcoming conferral with Pacific Premier Bank and planned productions
07/25/22	L. Peterson	3.9	Virtual meeting with Joseph Vance, Edward Decker, and Eric Mills to discuss upcoming conferral with Pacific Premier Bank and planned productions (.4); virtual meeting with Edward Decker re discovery issues (.2); review issues re productions to Pacific Premier Bank and Riverview Community Bank and email to Joseph Vance re same (.5); compile documents produced in Pond matter (.3); continue to review, analyze, and prepare index of Pacific Premier Bank's production of documents (2.5)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/25/22	J. Vance	0.7	Analyze email from Shannon Armstrong re Pacific Premier Bank discovery matters (.3); virtual meeting with Edward Decker, Lisa Peterson, and Eric Mills (.4)
07/26/22	E. Decker	1.7	Virtual meeting with David Foraker (.3); virtual meeting with Lisa Peterson to discuss planned productions to Pacific Premier Bank (.3); calls with Hannah Schmidt to discuss search for and review of loose hard-copy documents (.4); virtual meeting with Nick Miller to discuss production of documents from database and new search terms from Pacific Premier Bank (.1); draft responses to Pacific Premier Bank's third set of requests for production (.3); prepare for conferral with Pacific Premier Bank on discovery issues (.3)
07/26/22	D. Foraker	0.4	Emails with Edward Decker re Pacific Premier Bank's request for documents produced in AEM main receivership proceeding (.1); virtual meeting with Edward Decker re Pacific Premier Bank's request for documents produced in AEM main receivership proceeding (.3)
07/26/22	N. Miller	2.3	Review receiver email collection for responsiveness and privilege, organize production of document production suitable for attorney review, and coordinate production of receiver emails with Streamline Imaging (1.8); review production of receiver emails for quality (.5)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/26/22	L. Peterson	3.3	Communications with Nick Miller re specifics of running email production in database (.6); virtual meeting with Edward Decker to discuss planned productions to Pacific Premier Bank (.3); prepare ShareFile of documents for Mike Ueltzen and Paul Artley and email link (.4); continue to review, analyze, and prepare index of Pacific Premier Bank's production of documents (.5); update expert ShareFile with Pacific Premier Bank's seventh document production and field coding index (.2); emails to expert re Pacific Premier Bank's seventh document production (.1); emails to Hannah Schmidt and Heather Harmon re field coding index for Pacific Premier Bank's seventh document production (.1); compile memos to file by Greg Usselman from Pacific Premier Bank's seventh document production and email same to Joseph Vance (.5); download and organize documents from Hannah Schmidt of hard copy scans from Hamstreet files and coordinate inclusion in electronic database (.5); email to Joseph Vance and Edward Decker re additional documents from Hannah Schmidt (.1)
07/27/22	E. Decker	1.6	Correspond with Lisa Peterson and Nick Miller on details and final questions for production of receiver's emails and new searches requested by Pacific Premier Bank (.5); draft talking points memo for upcoming discovery conferral with Pacific Premier Bank (1.1)
07/27/22	N. Miller	0.8	Run search terms provided from opposing counsel on in-house database and organize results suitable for attorney review
07/27/22	L. Peterson	1.2	Emails with Edward Decker and Nick Miller re production of Hamstreet emails from database (.5); review email from expert re loan files 5305 and 5403, research in database, and email to Hannah Schmidt re same (.6); email to Streamline Imaging to request pdfs of loan files 5305 and 5403 (.1)
07/28/22	E. Decker	2.4	Prepare for discovery conferral with Pacific Premier Bank's counsel (1.0); research in preparation for discovery conferral (1.0); coordinate production of additional records to Pacific Premier Bank (.4)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/28/22	H. Harmon	0.2	Prepare draft of fifth set of interrogatories and requests for production to Pacific Premier Bank
07/28/22	N. Miller	1.0	Coordinate production of receiver emails and organize production suitable for attorney review
07/28/22	L. Peterson	3.2	Communications with Ara Roselani re loan files 5305 and 5403 (.7); download and organize Pacific Premier Bank's eighth document production of documents and prepare instructions for inclusion in electronic database (.5); upload document re Randy Goode to ShareFile and email link to expert (.2); email to Joseph Vance re Randy Goode loan amortization schedule (.1); emails with Joseph Spring re Pacific Premier Bank's eighth document production (.1); communications with Edward Decker re Pacific Premier Bank's discovery and re database issues (.3); organize loan files 5305 and 5403, upload to expert ShareFile, and email link to expert (.4); review staging of next production of documents and emails with Edward Decker and Nick Miller re same (.2); email to expert with Bates numbered documents as replacements (.3); email to Zachary Larmer re loan files (.1); emails to Joseph Vance and Edward Decker re document production issues (.1); prepare instructions for inclusion of Randy Goode loan amortization spreadsheet in electronic database (.2)
07/29/22	E. Decker	2.8	Serve document productions on defendants' counsel (.5); analyze letter received from Pacific Premier Bank re its responses to discovery (.4); virtual meeting with Lisa Peterson re discovery issues (.7); draft talking points memo for upcoming conferral with Pacific Premier Bank (.6); telephone conference with Hannah Schmidt to discuss additional documents for potential production or to be shared with expert (.1); research in preparation for conferral with Pacific Premier Bank (.5)
07/29/22	H. Harmon	0.3	Compile list of subpoenas issued in AEM main receivership proceeding in preparation for discovery response in adjunct lawsuit

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/29/22	E. Mills	5.1	Draft talking points memo re offensive discovery for conferral call with Pacific Premier Bank (1.3); review and analyze letter from counsel for Pacific Premier Bank and revise talking points memo (1.1); draft and revise letter to counsel for Riverview Community Bank re deficient and outstanding written discovery responses (2.7)
07/29/22	L. Peterson	3.2	Virtual meeting with Edward Decker re discovery issues (.7); finalize supplemental production of documents and email summary and link to Edward Decker (.5); review and analyze documents for privilege and responsiveness to discovery requests and communications with Edward Decker re same (1.0); communications with Hannah Schmidt re additional loan files to prepare for expert review from database (.5); email to Heather Harmon re subpoenas in main receivership case (.1); emails from Hannah Schmidt re Hamstreet email query (.1); update document index (.3)
07/31/22	L. Peterson	1.2	Organize data and email to Streamline Imaging re ingestion of second round of Hamstreet emails into database (.3); emails with Hannah Schmidt re Jackpine files in database (.5); continue to update document index (.4)

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
D. Foraker	Partner	1.6	\$630	\$1,008.00
J. Vance	Partner	22.4	550	12,320.00
E. Decker	Partner	25.7	475	12,207.50
E. Mills	Associate	10.1	410	4,141.00
L. Peterson	Paralegal	51.1	280	14,308.00
N. Miller	Paralegal	7.9	250	1,975.00
H. Harmon	Paralegal	1.9	225	427.50
Summary Total:		120.7		\$46,387.00

Account: 721921

Invoice: 2191336

August 4, 2022

Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Streamline Imaging: Relativity Project Management, Relativity Production Set Processing, Data Storage, and Users	2,353.98
Disbursement Total:	<u>\$2,353.98</u>

Invoice Summary

Professional Fees Through July 31, 2022	\$46,387.00
Disbursements	<u>\$2,353.98</u>
Amount Due - Current Period:	<u>\$48,740.98</u>



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

Account: 721921.0019
Investigation of Adjunct Litigation Claims Against AEI/AEMM Lenders

Invoice: 2191335
August 4, 2022

Invoice Summary

Professional Fees Through July 31, 2022	\$1,817.50
Disbursements	<u>\$-1,000.00</u>
Amount Due – Current Period:	<u>\$817.50</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.

Invoice Detail

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/15/22	J. Knapp	0.9	Review mail from Tim De Jong re class settlement agreement (.2); review and comment on class settlement agreement, partial judgment, and bar order (.7)
07/16/22	J. Vance	0.4	Prepare settlement agreement
07/18/22	J. Knapp	0.2	Virtual meeting with Joe Vance re Davis Wright Tremaine bar order issues
07/18/22	J. Vance	0.2	Virtual meeting with John Knapp
07/20/22	J. Knapp	0.3	Email communications with John Stephens re basis for bar order
07/21/22	J. Knapp	0.8	Emails with John Stephens re bar order (.2); review example of motion for bar order (.3); emails with Clyde Hamstreet and Hannah Schmidt re class action settlement documents (.3)
07/27/22	J. Knapp	0.2	Emails with John Rake re revisions to settlement agreement and partial judgment
07/31/22	J. Knapp	0.1	Emails with Hannah Schmidt re class action settlement agreement and partial judgment

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
J. Knapp	Partner	2.5	\$595	\$1,487.50
J. Vance	Partner	0.6	550	330.00
Summary Total:		3.1		\$1,817.50

Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Return deposit balance from Kent Mediation	-1,000.00
Disbursement Total:	\$-1,000.00

Account: 721921

Invoice: 2191335

August 4, 2022

Invoice Summary

Professional Fees Through July 31, 2022

\$1,817.50

Disbursements

\$-1,000.00

Amount Due - Current Period:

\$817.50

EXHIBIT C



SPECIALIZED
FORENSIC
INVESTIGATIONS

Invoice

Specialized Forensic Investigations LLC

5701 Lonetree Blvd., Suite 212
Rocklin, CA 95765

Invoice Date:	Invoice #:
8/1/2022	1708

Bill To:
Miller Nash Graham & Dunn LLP John R. Knapp, Jr. P.C. Pier 70, 2801 Alaskan Way, Suite 300 Seattle, WA 98121

Due Date:	Project:	Fed ID# 83-3192098
9/1/2022	Hamstreet & Associates	

Date	Description	Hours	Rate	Amount
7/11/2022	Phone call Preparation for and Zoom with attorney, Hamstreet and Mike Ueltzen	0.9	300.00	270.00
7/12/2022	Investigation Review of reports and documents regarding banks	1.8	300.00	540.00
7/12/2022	Phone call Preparation for and Zoom with Hamstreet and Mike Ueltzen	1.2	300.00	360.00
7/20/2022	Phone call Preparation for and Zoom with attorney, Hamstreet and Mike Ueltzen	0.5	300.00	150.00
7/27/2022	Investigation Review of legal filings	0.5	300.00	150.00

Thank you for your business.

Total	\$1,470.00
Payments/Credits	\$0.00
Balance Due	\$1,470.00

EXHIBIT D

Michael G. Ueltzen, CPA
606 East Ranch Road
Sacramento, CA 95825
916-333-2793
85-3260070

John R. Knapp
Miller Nash Graham & Dunn
Pier 70
2801 Alaskan Highway, Suite 300
Seattle, Washington 98121

Re: American Eagle Mortgage - Receivers' Accountant
July 2022 Professional Services

Date	Description	Person	Hours	Rate	Amount
7/10/2022	Call with counsel and related prep.	MU	0.9	450.00	\$ 405.00
7/12/2022	Review materials and call with PA and HS	MU	3.6	450.00	1,620.00
7/20/2022	Call and related preparation with forensic team members	MU	3.2	450.00	1,440.00
7/21/2022	Review complaints and refine Summary	MU	2.5	450.00	<u>1,125.00</u>
	Total Fees				<u>\$ 4,590.00</u>

EXHIBIT E



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	14401
Date	07/31/22
Job Number	AEM-003
PO#	--
Charge#	--

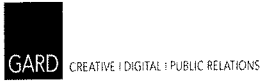
Job Name: Microsite Updates & Maintenance

Agency Contact: Brian Gard

Description: For Professional Services Rendered Through July, 2022:

Description	Hours Billed	Amount
Account Services	1.00	\$137.50
Professional Services Subtotal:	1.00	\$137.50
 TOTAL:	 1.00	 \$137.50

PAYMENT TERMS: net 30 days



Invoice Detail Report

Invoice : 14401 Client : Hamstreet & Associates - AEM (AEM)

08/08/22 10:33 AM
(TY)

Reference:	Date:	Vendor/Staff:	Hours:	Billed:		
AEM-003	Microsite Updates & Maintenance					
Account Services:			Rate	Hrs	Amount	
382147	07/06/22	TY Account administration	Teri Yamauchi	\$100.00	0.50	\$50.00
383234	07/13/22	NK Document upload	Naureen Khan	\$175.00	0.20	\$35.00
384400	07/29/22	NK Document upload	Naureen Khan	\$175.00	0.30	\$52.50
					1.00	\$137.50
		AEM-003 TOTAL			1.00	\$137.50
INVOICE #14401 TOTAL:					1.00	\$137.50

EXHIBIT F

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
07/31/2022	22428
Terms	Service Through
	07/31/2022

In Reference To: EAST CAPE G&A (Legal fees)

Date	By	Services	Hours	Rates	Amount
07/13/2022	DV/LB	Internal call with Maria Jose (new crew member)	0.50	\$ 50.00/hr	\$ 25.00
07/14/2022	DV/LB	Coordinate DocuSign for Lot 22 buyers	0.30	\$ 50.00/hr	\$ 15.00
07/15/2022	DV/LB	Development Team zoom meeting	0.40	\$ 50.00/hr	\$ 20.00
07/15/2022	DV/LB	Coordinate DocuSign for Lot 23 buyer	0.30	\$ 50.00/hr	\$ 15.00
07/18/2022	DV/LB	Coordinate PTT DocuSign for Lot 21 buyer	0.30	\$ 50.00/hr	\$ 15.00
07/26/2022	DV/LB	addendum to PTT Lot 22	0.50	\$ 50.00/hr	\$ 25.00
07/27/2022	DV/LB	Communications with Ricardo Carrillo Reviewing Trust Taxes (ISABI)	0.40	\$ 50.00/hr	\$ 20.00
07/28/2022	DV/LB	Weekly team call	0.20	\$ 50.00/hr	\$ 10.00

Total Hours 2.90 hrs
Total Legal fees \$ 145.00
Total Amount \$ 145.00

In Reference To: General (Legal fees)

Date	By	Services	Hours	Rates	Amount
07/05/2022	BR	Review: and comment on Tamar Offer.	0.25	\$ 350.00/hr	\$ 87.50
07/15/2022	DV/LB	Closing Tamar 200 - review and coordinate execution of Escrow Agreement	0.90	\$ 100.00/hr	\$ 90.00
07/25/2022	DV/LB	Villa Montaña - After closign follow up & communications with accountant re: closing tax matters	0.50	\$ 100.00/hr	\$ 50.00
07/28/2022	BR	Telephone call: CPA Palomino re: tax compliance matters.	0.25	\$ 350.00/hr	\$ 87.50

07/29/2022	DV/LB	Review Tamar 200 closing docs	0.30	\$ 100.00/hr	\$ 30.00
07/31/2022	BR	Local Management & Banking Support (AEMEMMX S DE RL DE CV) July, 2022	Flat Fee	\$ 200.00	\$ 200.00

In Reference To: General (Expenses)

Date	By	Expenses	Amount
05/13/2022	BR	Mailing/Postage: DHL shipping -Fabro Notary Services (USA) to Daniela Velazquez (SJC) Closing AEM-SEA Apostilles MXN\$1,577.85 Fx\$19.50	\$ 80.91
07/13/2022	BR	Government Fees : Municipio de los Cabos - Cash MXN\$7,736.73 Fx\$19.50. Inscription Todos Santos, Tamares y Condo E2 Fx \$19.50	\$ 396.75

Total Hours	2.20 hrs
Total Legal fees	\$ 545.00
Total Expenses	\$ 477.66
Total Amount	\$ 1,022.66

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

Date	By	Services	Hours	Rates	Amount
07/04/2022	BR	Draft: revisions to PSA, CC&Rs and Construction Regs;; email to Hannah and Valerio.	2.50	\$ 350.00/hr	\$ 875.00
07/19/2022	BR	Communications: Meeting Ricardo re: negotiations with municipality re: transfer taxes and game plan/options.	0.75	\$ 350.00/hr	\$ 262.50
07/20/2022	BR	Telephone call: Hannah re: PSA re: financing addendum, transfer tax issue.	0.25	\$ 350.00/hr	\$ 87.50
07/29/2022	BR	Communications: internal re: transfer tax issue. Discussions local consultants re: same.	0.30	\$ 350.00/hr	\$ 105.00

Total Hours	3.80 hrs
Total Legal fees	\$ 1,330.00
Total Amount	\$ 1,330.00

Total Hours	8.90 hrs
Total Legal fees	\$ 2,020.00
Total Expenses	\$ 477.66
Total Invoice Amount	\$ 2,497.66

Notes:

Thank you in advance for your prompt payment.