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09-13-2022, 14:01

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

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8 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 (MARCH AND AUGUST
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
(MARCH AND AUGUST 2022) - 1

4858-7042-5137.1

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 (March and August 2022) in
4 accordance with Paragraph 11 of the Order Appointing General Receiver dated May 10, 2019
5 (the “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 August 2022. For this period, the Receiver requests
15 final approval of its compensation in the amount of \$18,465.00 and reimbursement of no costs,
16 for a total payment of \$18,465.00.

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 August 2022.
19 For this period, such attorneys request final approval of their compensation in the amount of
20 \$100,662.00 and reimbursement of costs of \$3,868.26, for a total payment of \$104,530.26.

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 August 2022. For this period, such forensic accountants request final
24 approval of their compensation in the amount of \$1,080.00 and reimbursement of no costs, for a
25 total payment of \$1,080.00.

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 August 2022. For this period, such forensic accountant requests final approval of his
4 compensation in the amount of \$2,475.00 and reimbursement of no costs, for a total payment of
5 \$2,475.00.

6 Attached as Exhibit E hereto is a true and correct copy of the time and expense summary
7 of the Receiver's authorized special counsel in Mexico, Rosen Law, S.C., for services and costs
8 in March and August 2022. The Receiver's Notice of Intent to Compensate (March, April, and
9 May 2022) requested payment of \$1,580.18 of the \$2,627.68 that is included in the March 31,
10 2022, invoice in Exhibit E; this notice requests payment of the remaining \$1,047.50 for March.
11 For August, such attorneys request final approval of their compensation in the amount of
12 \$7,590.00 and reimbursement of no costs. For March and August 2022 combined, therefore, such
13 attorneys request final approval of their compensation in the amount of \$8,637.50 and
14 reimbursement of no costs, for a total payment of \$8,637.50.

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 September 26, 2022, the Receiver may make the
17 payments requested herein and/or the professionals may apply their retainers, if any.

18 DATED this 13th day of September, 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

September 9, 2022

Invoice # 2565

Professional Services

			<u>Hours</u>	<u>Amount</u>
8/2/2022	HS	Receivership Duties Read and respond to emails. Call with Clyde Hamstreet regarding Stoley progress.	0.50	250.00
	CAH	Receivership Duties Review progress with expert witness regarding banking irregularities and need to wire partial payment. Discuss general upcoming litigation issues.	0.70	420.00
8/4/2022	HS	Receivership Duties Call with Jesus Palamores regarding special assets.	0.40	200.00
	HS	Receivership Duties Calls and emails regarding Mexican and Montana real estate.	0.50	250.00
	HS	Litigation Support Call with class action team, follow up regarding same.	0.80	400.00
8/5/2022	HS	Pacific Premier Bank Review 2nd supplemental responses and email to Joe Vance regarding same.	0.80	400.00
	HS	Litigation Support Respond to question related to production.	1.00	500.00
	HS	Receivership Duties Read and respond to emails.	0.30	150.00
	HS	Receivership Duties Calls and emails regarding Promise of Trust for Mar de Plata.	0.50	250.00
	HS	Receivership Duties Call with Veronica Hamstreet, Evelyn Torres and Daniela Velazquez regarding Todos Santos and Mar de Plata.	0.60	300.00
	HS	Litigation Support Call with Paul Artley regarding damages.	1.10	550.00

			<u>Hours</u>	<u>Amount</u>
8/6/2022	HS	Litigation Support Research and respond to questions from Stoley.	2.00	1,000.00
8/7/2022	HS	Litigation Support Compile information for damage experts.	1.40	700.00
8/8/2022	HS	Litigation Support Review transaction ledgers for class action team.	0.50	250.00
	HS	Receivership Duties Read and respond to emails.	0.50	250.00
	HS	Receivership Duties Calls and emails regarding Mar de Plata documents. Calculate amounts for the Promise to Trust.	0.80	400.00
8/11/2022	HS	Receivership Duties Calls and emails regarding Mexican real estate.	0.40	200.00
	HS	Litigation Support Call with class action team.	0.50	250.00
	HS	Riverview Bank Call with Rod Werhan.	1.10	550.00
8/12/2022	HS	Litigation Support Review RP loan detail for Stoley Group.	1.20	600.00
8/15/2022	HS	Litigation Support Research RP Loans and compile information for Stoley Group.	1.50	750.00
	HS	Receivership Duties Prepare for and call with Janet Jensen and Joanne Berkowitz, Ben Rosen and Veronica Hamstreet regarding Todos Santos.	1.20	600.00
8/16/2022	HS	Litigation Support Read and respond to emails.	1.00	500.00
8/17/2022	HS	Receivership Duties Discussion with Veronica Hamstreet regarding Todos Santos. Emails regarding same.	0.50	250.00
	MA	Advisory Services Email to Walt Snyder requesting an update on the dumpsters.	0.10	32.50
8/18/2022	HS	Riverview Bank Call with Rod Werhan.	1.80	900.00
	MA	Advisory Services Call Evergreen disposal.	0.10	32.50

			<u>Hours</u>	<u>Amount</u>
8/18/2022	MA	Advisory Services Update property cleanup estimate; contacted Walt Snyder; email update to Hannah Schmidt.	0.60	195.00
8/19/2022	MA	Advisory Services Call with Evergreen disposal. Fill rollout paperwork and forward to Hannah Schmidt.	1.00	325.00
8/22/2022	HS	Litigation Support Call with class action team.	0.20	100.00
	HS	Receivership Duties Read and respond to emails.	1.00	500.00
	HS	Pacific Premier Bank Calls and emails with Rod Werhan.	2.90	1,450.00
	HS	Litigation Support Research and respond to questions from Stoley Group and Miller Nash.	4.00	2,000.00
8/23/2022	MA	Advisory Services Place dumpster order with Evergreen disposal.	0.30	97.50
8/24/2022	HS	Receivership Duties Emails regarding Tamar 200.	0.30	150.00
8/25/2022	HS	Litigation Support Research question form Rod Werhan.	0.70	350.00
	MA	Advisory Services Return call to Evergreen; send email to Walt Snyder with dumpster update.	0.10	32.50
	MA	Advisory Services Follow-up with Evergreen disposal on dumpster order; email Hannah Schmidt regarding dumpster pre-payment.	0.30	97.50
8/27/2022	HS	Litigation Support Begin review of draft report from banking experts.	0.70	350.00
	HS	Pacific Premier Bank Read response to interrogatories.	0.70	350.00
8/29/2022	HS	Receivership Duties Prepare for and call with Daniela Velazquez, Evelyn Torres and Veronica Hamstreet regarding Mexico developments.	0.60	300.00
	HS	Litigation Support Prepare for and call with Mike Ueltzen and Paul Artley regarding damages.	1.00	500.00
8/30/2022	HS	Litigation Support Call with Joe Vance.	0.20	100.00

		<u>Hours</u>	<u>Amount</u>
8/30/2022	HS Receivership Duties Call with Ben Rosen regarding Todos Santos and Mexican taxes.	0.20	100.00
	HS Litigation Support Read and respond to emails.	0.50	250.00
	HS Receivership Duties Read and respond to emails regarding real estate.	0.50	250.00
	MA Advisory Services Email Hannah Schmidt with cleanup update.	0.10	32.50
For professional services rendered		37.70	\$18,465.00
Accounts receivable transactions			
9/8/2022	Payment invoice #2560 - Thank You. Check No. 1632		(\$26,681.00)
Total payments and adjustments			(\$26,681.00)
Balance due			<u>\$18,465.00</u>

Consultant Summary			
<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Clyde A. Hamstreet - Principal	0.70	600.00	\$420.00
Hannah Schmidt - Consultant	34.40	500.00	\$17,200.00
Matthew Alford - Consultant	2.60	325.00	\$845.00

EXHIBIT B

Client.Matter	Description	Bill Amt	Fees	Costs	Bill Num
721921.0001	American Eagle Mortgage Investment Funds	\$3,641.00	\$3,351.00	\$290.00	2193157
721921.0017	Adjunct Litigation Claims Against Ross Miles, Maureen Wile, et al.	\$97,599.76	\$94,021.50	\$3,578.26	2193170
721921.0019	Investigation of Adjunct Litigation Claims Against AEI/AEMM Lenders	\$3,034.50	\$3,034.50	\$0.00	2193158
721921.0023	Adjunct Litigation Claims Against Ridgecrest Development III	\$255.00	\$255.00	\$0.00	2193088
		\$104,530.26	\$100,662.00	\$3,868.26	



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: 2193157
September 8, 2022

Invoice Summary

Professional Fees Through August 31, 2022	\$3,351.00
Disbursements	<u>\$290.00</u>
Amount Due – Current Period:	<u>\$3,641.00</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.

Invoice Detail

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/02/22	J. Knapp	0.5	Emails with Paul Artley re notice of intent to compensate (July 2022) (.2); draft notice of intent to compensate (July 2022) (.3)
08/04/22	J. Palomares	0.3	Virtual meeting with Hannah Schmidt re delinquent loans receivable and next steps strategy
08/08/22	J. Knapp	0.9	Email communications with Rosen Law Firm billing department re notice of intent to compensate (July 2022) (.1); email communications with Teri Yamaguchi re notice of intent to compensate (July 2022) (.2); continue drafting notice of intent to compensate (July 2022) (.6)
08/12/22	J. Knapp	0.8	Continue drafting notice of intent to compensate (July 2022) (.5); email communications with Veronica Hamstreet and Hannah Schmidt re notice of intent to compensate (July 2022) (.3)
08/15/22	J. Knapp	0.3	Email communications with Veronica Hamstreet re notice of intent to compensate (July 2022) (.1); continue drafting notice of intent to compensate (July 2022) (.2)
08/16/22	J. Knapp	0.7	Finalize notice of intent to compensate (July 2022) (.4); email communications with Naureen Khan re transmittal of court filings for uploading to website (.2); virtual meeting with Joe Vance re SEC proceeding status (.1)
08/16/22	J. Vance	0.1	Virtual meeting with John Knapp re SEC proceeding status
08/22/22	J. Knapp	0.6	Emails with Hannah Schmidt re proposed sale of Tamar 200 condominium in Los Cabo (.2); draft notice of sale (Tamar 200) (.4)
08/23/22	J. Knapp	0.4	Finalize notice of sale (Tamar 200) (.2); emails with Naureen Khan re transmittal of notice of sale (Tamar 200) for posting to website (.2)
08/29/22	J. Knapp	0.1	Review email from Rosen Law billing department re status of outstanding invoices

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/30/22	J. Knapp	1.0	Review court docket (.1); emails with Hannah Schmidt re notices of intent to compensate (.9)

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
J. Knapp	Partner	5.3	\$595	\$3,153.50
J. Vance	Partner	0.1	550	55.00
J. Palomares	Partner	0.3	475	142.50
Summary Total:		5.7		\$3,351.00

Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Washington Secretary of State , Date: 7/31/2022	290.00
Disbursement Total:	\$290.00

Invoice Summary

Professional Fees Through August 31, 2022	\$3,351.00
Disbursements	\$290.00
Amount Due - Current Period:	\$3,641.00



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: 2193170
September 8, 2022

Invoice Summary

Professional Fees Through August 31, 2022	\$94,021.50
Disbursements	\$3,578.26
Amount Due – Current Period:	<u>\$97,599.76</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>
08/01/22	E. Decker	4.1	Virtual meeting with Joe Vance and Eric Mills to prepare for conferral with Pacific Premier Bank's counsel (.5); draft talking points memo for meet and confer with Pacific Premier Bank (.5); meet and confer with counsel for Pacific Premier Bank re discovery disputes (1.6); draft responses to Pacific Premier Bank's third set of requests for production (.8); coordinate intake and processing of newly collected documents from receiver (.2); draft analysis of follow-up tasks following meet and confer with Pacific Premier Bank (.5)
08/01/22	E. Mills	2.0	Virtual meeting with Joe Vance and Edward Decker to prepare for conferral with Pacific Premier Bank (.5); revise talking points memo for meet and confer with Pacific Premier Bank (.6); research, analyze, and summarize case law re requiring legal analysis in interrogatory responses (.9)
08/01/22	L. Peterson	4.9	Telephone call with Joe Vance re informal interview notes issue (.1); virtual meeting with Nick Miller re interview notes (.3); review, analyze, and prepare index of Pacific Premier Bank's eighth production of documents (3.0); email summary of same to Joe Vance (.4); address emails from Leann Astheimer re processing of receiver's productions (.1); prepare ShareFile for PPB's eighth production of documents and email links to Hannah Schmidt and expert (.3); update document index (.2); review issues re exhibits to informal interviews with Ross Miles and Maureen Wile (.5)
08/01/22	J. Vance	6.5	Virtual meeting with Edward Decker and Eric Mills (.5); meet and confer with counsel for Pacific Premier Bank re discovery disputes (1.6); analyze and outline strategy re discovery disputes (2.5); analyze document production (1.9)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/02/22	E. Decker	3.1	Virtual meeting with Eric Mills to discuss research and other discovery projects (.3); virtual meeting with Nick Miller and Lisa Peterson to discuss review of receiver's emails and responses to questions from Pacific Premier Bank (.5); draft supplemental responses to Pacific Premier Bank's interrogatories and requests for production (1.0); research in preparation for follow-up conferral with Pacific Premier Bank (1.3)
08/02/22	N. Miller	0.5	Virtual meeting with Edward Decker and Lisa Peterson to discuss review of receiver's emails and responses to questions from Pacific Premier Bank
08/02/22	N. Miller	3.5	Review receiver's email production and draft answers in response to questions from Pacific Premier Bank (2.5); review receiver's email collection for unique email addresses suitable for sharing with client (1.0)
08/02/22	E. Mills	1.3	Virtual meeting with Edward Decker re outstanding discovery responses from Pacific Premier Bank and Riverview Bank and responses to demands for supplemental discovery from Pacific Premier Bank (.3); draft and revise letter to counsel for Riverview Bank re outstanding discovery responses (.2); research and analyze case law and statutes re bank's duty to notify beneficiaries of breach of fiduciary duty (.8)
08/02/22	L. Peterson	2.8	Emails with Leann Astheimer re passwords (.2); review re-runs of document productions requested by Leann Astheimer and address issues re Bates numbering discrepancies (.6); virtual meeting with Edward Decker and Nick Miller to discuss receiver's emails and response to questions from Pacific Premier Bank (.5); review and analyze interview notes and documents for response to discovery requests (1.2); virtual meeting with Nick Miller re email review (.3)
08/02/22	J. Vance	0.4	Revise discovery requests

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/03/22	E. Decker	4.1	Virtual meeting with Joe Vance to discuss supplemental interrogatory responses and prepare for follow-up conferral with Pacific Premier Bank (.5); research in preparation for conferral with Pacific Premier Bank (1.0); confer with counsel for Pacific Premier Bank on discovery issues (.4); draft follow-up to Pacific Premier Bank re outstanding response to receiver's interrogatory (.3); draft responses and objections to Pacific Premier Bank's third set of requests for production (.5); telephone call with Lisa Peterson to discuss privilege review of document collected from receiver's files (.3); draft additional requests for production to both bank defendants (1.1)
08/03/22	N. Miller	1.4	Code bank lender and account number information to database of scanned loan files
08/03/22	L. Peterson	3.6	Emails with Joseph Spring re status of resolving production issue (.1); telephone call with Edward Decker to discuss privilege review of documents collected from receiver's files (.3); analyze privileged emails, prepare summary of search criteria and number of documents tagged, and email same to Edward Decker (1.0); virtual meeting with Nick Miller re email review (.3); email to Streamline Imaging with instructions for fourth production of loan files (.2); review loan files production for accuracy and organize and stage in ShareFile for production (.6); update document index (.2); continue to review and analyze documents for privilege and responsiveness to discovery requests (.9)
08/03/22	J. Vance	5.5	Virtual meeting with Edward Decker (.5); confer with counsel for Pacific Premier Bank on discovery issues (.4); draft supplemental discovery responses (4.6)
08/04/22	E. Decker	2.1	Virtual meeting with Joe Vance to discuss supplemental responses to Pacific Premier Bank's interrogatories (.2); draft new requests for production and interrogatory to Pacific Premier Bank (.8); revise draft responses to Pacific Premier Bank's third set of requests for production (.3); draft supplemental response to Pacific Premier Bank's interrogatories (.5); direct team on review and production of additional documents (.3)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/04/22	D. Foraker	0.4	Review email from Trey Tennyson (AEM investor) re request for litigation update with list of questions and related emails with Trey Tennyson and Joe Vance
08/04/22	N. Miller	1.2	Code bank lender and account number information to database of scanned loan files
08/04/22	L. Peterson	5.5	Review and respond to email from Joseph Spring with link to re-run of production requested by Leann Astheimer (.2); continue to review and analyze documents for response to discovery requests (1.5); review and analyze informal interview notes and identify exhibit documents (2.0); review and analyze document status of subpoenas issued in main receivership action and email summary to Edward Decker (.8); email to Joe Vance and Edward Decker re production status of certain documents received from Hannah Schmidt in February 2022 (.6); email to Edward Decker re documents to produce from receiver's production in receivership action (.1); update document index (.3)
08/04/22	J. Vance	7.7	Prepare supplemental discovery responses (7.5); virtual meeting with Edward Decker (.2)
08/05/22	E. Decker	2.1	Revise draft responses and objections to Pacific Premier Bank's third set of requests for production (.3); finalize draft requests for production to Pacific Premier Bank (.5); draft requests for production and interrogatory to Riverview Bank (.8); revise draft supplemental responses to Pacific Premier Bank's interrogatories (.5)
08/05/22	D. Foraker	0.1	Emails with Lisa Peterson and John Knapp re payment of litigation vendor invoice
08/05/22	H. Harmon	0.1	Finalize fifth set of discovery requests to Pacific Premier Bank and prepare for distribution and update case docketing
08/05/22	J. Knapp	0.6	Emails with David Foraker re payment of litigation vendor invoice (.1); emails with Hannah Schmidt re same (.2); emails with Joe Vance re forensic accountants (.2); review Paul Artley and Michael Ueltzen declarations (.1)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/05/22	N. Miller	0.2	Code bank lender and account number information to database of scanned loan files
08/05/22	E. Mills	0.6	Review and revise letter to counsel for Riverview Bank re outstanding discovery responses (.3); strategize re additional discovery requests to banks (.3)
08/05/22	L. Peterson	4.0	Review email from Hannah Schmidt re email query (.1); emails re Streamline Imaging invoice for document scanning (.2); review receiver's productions made in receivership action and confirm productions of questionnaires, 1099s, sales brochures, and investor files in adjunct litigation (1.5); emails to Edward Decker re receivership productions (.2); review and respond to email from Joe Vance addressing issues related to document production (.5); telephone call with Joe Vance re Stott email and interview notes issues (.1); email to Hannah Schmidt re interview note exhibits (.1); prepare documents in electronic database for production and email instructions to litigation support (.6); update document indices (.5); emails with Skyler Helsley re production issues (.2)
08/05/22	J. Vance	2.6	Telephone call with Dan Peterson re status of his client (.2); revise and edit discovery responses (1.5); telephone call with Lisa Peterson (.1); analyze documents produced by defendants (.8)
08/08/22	E. Decker	2.4	Draft 30(b)(6) deposition topics for Pacific Premier Bank (1.8); finalize responses and objections to Pacific Premier Bank's third set of requests for production (.4); virtual meeting re update on common litigation matters (.2)
08/08/22	D. Foraker	0.3	Virtual meeting with Chris Kayser, Mike Esler, John Rake, Bridget Donegan, Hannah Schmidt, Joe Vance, and Edward Decker re update on common litigation matters (.2); emails with Joe Vance re status of Trey Tennyson communications (.1)
08/08/22	H. Harmon	0.2	Assist with finalizing discovery requests and supplemental responses and update case docketing

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/08/22	N. Miller	1.0	Code bank lender and account number information to database of scanned loan files (.7); review receiver's email collection for responsiveness and privilege in preparation for supplemental production (.3)
08/08/22	L. Peterson	3.2	Research and respond to emails from Joe Vance re Julia Pond exhibits (.5); virtual meeting with Edward Decker re deposition transcripts requested by Pacific Premier Bank's counsel (.1); review email from Hannah Schmidt with additional exhibits from informal interviews and organize same (.2); prepare instructions for inclusion of documents in electronic database (.2); research in database and email to Streamline Imaging to request loan file 5436 in pdf (.3); prepare additional documents for review by experts, incorporate in ShareFile and email links to experts (1.7); update table of documents provided to experts (.2)
08/08/22	J. Vance	0.5	Virtual meeting re update on common litigation matters (.2); revise and finalize discovery responses (.3)
08/09/22	E. Decker	2.8	Serve production of documents on defendants (.4); virtual meeting with Eric Mills to discuss discovery owed by Riverview Bank and Pacific Premier Bank (.2); draft 30(b)(6) deposition topics for Riverview Bank and Pacific Premier Bank (2.2)
08/09/22	E. Mills	0.2	Virtual meeting with Edward Decker
08/09/22	L. Peterson	2.8	Emails with Joe Vance re exhibits to informal interviews (.1); email to Michael Ueltzen and Paul Artley with link to updated spreadsheet (.1); prepare instructions to litigation support for production of exhibits to informal interviews (.2); collect depositions requested by Pacific Premier Bank's counsel (.6); finalize supplemental production of documents, organize ShareFile of same, and email summary to Edward Decker (1.4); email to Heather Harmon with informal interview notes and exhibits (.3); update document index (.1)
08/10/22	E. Decker	1.2	Virtual meeting with Joe Vance and Eric Mills to discuss discovery projects and strategy for depositions (.5); draft topics for 30(b)(6) depositions of Pacific Premier Bank and Riverview Bank (.7)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/10/22	H. Harmon	0.5	Prepare attorney working notebook and electronic copy of receiver's interview notes and exhibits for Maureen Wile and Ross Miles
08/10/22	N. Miller	2.1	Review receiver's email collection for responsiveness and privilege in preparation for supplemental production
08/10/22	E. Mills	0.5	Virtual meeting with Joe Vance and Edward Decker to discuss discovery projects and strategy for depositions
08/10/22	L. Peterson	0.4	Virtual meeting with Heather Harmon re informal interview notes and exhibits (.2); telephone call from Nick Miller re review of receiver's email in database (.1); review email from Leann Astheimer requesting OCR load files for certain productions and email to litigation support re same (.1)
08/10/22	J. Vance	2.5	Virtual meeting with Edward Decker and Eric Mills (.5); outline issues for depositions (2.0)
08/11/22	E. Decker	1.8	Virtual meeting with Nick Miller to discuss review of receiver's emails and privilege logs (.2); virtual meeting with Lisa Peterson to discuss outstanding productions and upcoming deposition preparation (.2); draft 30(b)(6) deposition notices for Riverview Bank and Pacific Premier Bank (1.4)
08/11/22	N. Miller	1.9	Review receiver's email collection for responsiveness and privileged in preparation for supplemental production (1.7); virtual meeting with Edward Decker (.2)
08/11/22	L. Peterson	0.6	Virtual meeting with Edward Decker to discuss further productions and privilege log (.2); virtual meeting with Nick Miller re receiver's email review (.2); emails with Joseph Spring to address issues with requests from Leann Astheimer for new production load files (.2)
08/12/22	E. Decker	2.4	Draft 30(b)(6) deposition notices for Riverview Bank and Pacific Premier Bank
08/12/22	N. Miller	0.2	Review receiver's email collection for responsiveness and privilege in preparation for supplemental production

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/12/22	L. Peterson	0.6	Review invoice from Streamline Imaging for accuracy and email to Joe Vance re same (.2); emails with Joseph Spring re requests from Leann Astheimer and re data management for productions (.2); email to Edward Decker re informal interviews (.1); email from Zachary Larmer confirming return of files and update document index (.1)
08/15/22	E. Decker	3.1	Telephone conference with Hannah Schmidt to discuss documentation of related party loans (.2); virtual meeting with Lisa Peterson to discuss documents to be provided to expert and produced to defendants (.3); draft 30(b)(6) deposition notices for Pacific Premier Bank and Riverview Bank (2.6)
08/15/22	E. Mills	0.3	Review and analyze key documents for deposition of Greg Usselman
08/15/22	L. Peterson	1.7	Review email from Hannah Schmidt re related party loans and obtain documents from ShareFile (.1); research production status of promissory notes between the Pools and AEI (1.0); virtual meeting with Edward Decker to discuss related party notes (.3); email to Hannah Schmidt re related party loan documents (.1); communications with Joe Vance re related party loan documents (.2)
08/15/22	J. Vance	1.2	Outline issues for depositions
08/16/22	E. Decker	5.1	Virtual meeting with Joe Vance and Eric Mills to discuss final tasks for document discovery and preparation for depositions (.4); virtual meeting with Lisa Peterson to discuss final productions of documents (.3); revise draft 30(b)(6) deposition notices (2.4); research in support of 30(b)(6) deposition notices (2.0)
08/16/22	H. Harmon	0.1	Obtain case docket report and selected pleadings from California District Court for Pacific Premier Bancorp lawsuit for attorney review
08/16/22	H. Harmon	0.1	Provide copies of Michael Roberts deposition transcript and exhibits to Bridget Donegan

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/16/22	N. Miller	1.5	Coordinate supplemental production of receiver's emails with Streamline Imaging (.2); compile and organize deposition exhibits in preparation for Greg Usselman deposition (1.1); create Gard Communications saved search in relativity database of Receiver's emails suitable for attorney review (.2)
08/16/22	E. Mills	1.1	Virtual meeting with Joe Vance and Edward Decker to discuss final tasks for document discovery and preparation for depositions (.4); review and analyze key documents for deposition of Greg Usselman (.7)
08/16/22	L. Peterson	4.5	Email to Joe Vance re Pacific Premier Bank privilege log in response to subpoena (.3); continue to review and prepare related party loan documents for expert review (1.6); prepare instructions for inclusion of certain related party loan documents in electronic database (.4); email to Heather Harmon re documents to expert and tracking of QuickBook reports (.1); review exhibits to Ross Miles deposition (.2); communications with Edward Decker and Joe Vance re related party loan documents (.5); email to Nick Miller re Gard Communications emails (.1); review and analyze certain receiver's email communications for privilege and responsiveness to discovery requests (.7); virtual meeting with Edward Decker re final productions of documents (.3); email to expert with link to related party loan documents (.1); update document tracking chart (.2)
08/16/22	J. Vance	3.0	Virtual meeting with Edward Decker and Eric Mills (.4); prepare for and participate in telephone conference with Chip Paternoster re discovery (.5); contact deposition witness (.4); review and revise discovery (1.0); outline issue for depositions (.7)
08/17/22	E. Decker	2.6	Revise draft 30(b)(6) deposition notices (2.0); analyze communications between receiver and Gard Communications for privilege (.6)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/17/22	N. Miller	1.6	Draft receiver's email collection privilege log (.6); organize supplemental receiver's email production received from Streamline Imaging suitable for attorney review and production to opposing counsel (.8); edit Gard Communications search in relativity database of receiver's emails according to attorney feedback (.2)
08/17/22	L. Peterson	0.7	Review and analyze list of documents provided to expert for any documents not yet produced (.5); email to Edward Decker re Regents Bank letter (.1); email to Streamline Imaging to request pdfs of certain produced documents (.1)
08/17/22	J. Vance	2.5	Finalize topics for corporate deposition notices (.4); email to opposing counsel re deposition scheduling (.4); analyze documents for depositions (1.7)
08/18/22	E. Decker	1.0	Virtual meeting with Lisa Peterson and Nick Miller to discuss review of Gard Communications emails and final productions (.2); review emails with Gard Communications for privilege (.4); revise draft privilege log (.4)
08/18/22	D. Foraker	0.1	Emails with Joe Vance re Trey Tennyson conference
08/18/22	N. Miller	2.4	Virtual meeting with Lisa Peterson re review of receiver's email (.1); update receiver's email collection privilege log (.5); update players list with privilege entities identified by client (.4); virtual meeting with Edward Decker and Lisa Peterson to discuss review of Gard Communications emails and final productions (.2); edit Gard Communications search in database of receiver's emails according to attorney feedback (1.2)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/18/22	L. Peterson	6.2	Review and analyze numerous document collections for responsiveness to discovery requests and for documents provided to expert and not yet produced (4.4); virtual meeting with Nick Miller re review of receiver's email (.1); virtual meeting with Edward Decker and Nick Miller to discuss review of Gard Communications emails and final productions (.2); emails with Joe Vance re daily pool balances documents (.2); emails with Joe Vance and Edward Decker re contact list for claim holders and summary of transfers from LOC to pools spreadsheets (.4); update document tracking chart (.6); draft email to expert re documents (.3)
08/18/22	J. Vance	2.5	Telephone conference with Trey Tennyson re status of litigation (.8); emails with David Foraker re same (.2); review and comment on document production (.6); analyze discovery issues (.5); outline schedule for depositions (.4)
08/19/22	E. Decker	1.6	Review emails between receiver and Gard Communications for privilege issues (1.1); virtual meeting with Joe Vance to discuss planned productions (.2); virtual meeting with Lisa Peterson to discuss productions and privilege logs (.3)
08/19/22	N. Miller	0.5	Process and organize documents received from client in database of client materials suitable for attorney review (.3); virtual meeting with Lisa Peterson re document productions and privilege logs (.2)
08/19/22	E. Mills	0.5	Review potential exhibits and draft outline for deposition of Greg Usselman

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/19/22	L. Peterson	4.9	Continue to review and analyze numerous documents collections for responsiveness to discovery requests and for documents provided to expert and not yet produced (1.7); review emails from Hannah Schmidt re additional related party loans documentation, download, review, and organize same (.5); prepare instructions for inclusion of multiple collections of documents in electronic database (.4); virtual meetings with Edward Decker and Nick Miller re document productions and privilege logs (.5); virtual meeting with Joe Vance re same (.1); organize documents in ShareFile for production and for expert (1.0); email to expert with links to Bates numbered replacement documents and links to additional documents (.5); update tracking charts and document index (.2)
08/19/22	J. Vance	1.8	Outline issues for depositions (1.5); virtual meetings with Edward Decker and Lisa Peterson to discuss planned productions (.3)
08/22/22	D. Foraker	0.2	Virtual meeting with Chris Kayser, Jon Hunt, Bridget Donegan, John Rake, Hannah Schmidt, and Joe Vance re update on common litigation matters
08/22/22	E. Mills	1.3	Review potential exhibits and draft outline for deposition of Greg Usselman
08/22/22	L. Peterson	2.5	Review electronic database and prepare instructions for next production run (.4); email from Hannah Schmidt with updated title report document and communications with Joseph Spring re same (.2); organize and prepare ShareFile for document production (1.0); email to Joe Vance detailing documents included in production to defendants (.7); update document index (.2)
08/22/22	J. Vance	3.2	Virtual meeting re update on common litigation matters (.2); research legal issues related to issues for trial (1.5); analyze Pacific Premier Bank's supplemental discovery responses (1.5)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/23/22	E. Mills	0.8	Virtual meeting with Joe Vance re Greg Usselman deposition preparation matters (.1); review potential exhibits and draft outline for deposition of Greg Usselman (.7)
08/23/22	L. Peterson	3.7	Emails with Joe Vance re production (.1); email to opposing counsel re receiver's production of documents (.1); review and address issues re searching in electronic database (.4); update document index (.5); review and organize additional documents in ShareFile for expert review and email to expert re same (1.5); update document tracking notes (.3); download, review, and organize Riverview Bank's production of documents (.6); prepare instructions for inclusion of Riverview Bank's documents in electronic database and request for pdf set (.2)
08/23/22	J. Vance	2.6	Review documents to be produced (.5); exchange communications with deposition witness (.4); exchange communications with opposing counsel re deposition scheduling (.4); outline issues for depositions (1.2); virtual meeting with Eric Mills re Greg Usselman deposition preparation matters (.1)
08/24/22	H. Harmon	0.1	Prepare notice of deposition of Teresa Nagle
08/24/22	L. Peterson	2.0	Download, review, and organize Pacific Premier Bank's supplemental production of documents (.5); prepare instructions for inclusion of Pacific Premier Bank's documents in electronic database and request for pdf set (.2); emails with Hannah Schmidt and Joe Vance re revised Strunk title report and prepare instructions for litigation support re same (.3); research and email to Joseph Spring re OCR maintenance issue for electronic database (.3); review ShareFile notifications and update document indices (.7)
08/24/22	J. Vance	1.5	Exchange communications with opposing counsel re scheduling issues (.5); outline issues for depositions (1.0)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/25/22	D. Foraker	0.4	Review emails re Pacific Premier Bank and Riverview Bank discovery depositions (.1); virtual meeting with Joe Vance re Pacific Premier Bank and Riverview Bank discovery depositions (.3)
08/25/22	J. Knapp	1.0	Emails with Joe Vance re request for depositions (.2); review order appointing general receiver (.2); virtual meeting with Joe Vance re request for depositions (.2); review orders appointing forensic accountants (.2); emails with Joe Vance re orders appointing forensic accountants (.2)
08/25/22	L. Peterson	3.9	Email with Joseph Spring re processing of Riverview Bank and Pacific Premier Bank document productions and adjustments to database field coding (.5); review email from Hannah Schmidt re RMV documents (.2); communications with Joe Vance re RMV documents and re document productions (.3); prepare draft coding files for Riverview Bank and Pacific Premier Bank productions (1.3); prepare ShareFile for expert of Riverview Bank and Pacific Premier Bank productions and updated version of Strunk title report (.9); emails to expert re productions (.3); update document index (.3); email requested documents to Joseph Vance (.1)
08/25/22	J. Vance	4.6	Review communications from opposing counsel re discovery (.6); virtual meeting with David Foraker (.3); emails with John Knapp (.2); virtual meeting with John Knapp (.2); research issues related to discovery (3.0); outline issues for depositions (.3)
08/26/22	H. Harmon	0.5	Prepare notice of deposition, deposition subpoena, acceptance of service, and enclosure letter with witness fee check for Monte Schwartz and prepare for distribution (.4); update case docketing and coordinate court reporter services (.1)
08/26/22	E. Mills	0.3	Review potential exhibits and draft outline for deposition of Greg Usselman

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/26/22	L. Peterson	2.7	Communications with Hannah Schmidt and Joe Vance re documents for class action counsel (.1); review documents and prepare tables with links to all productions made by receiver, excluding highly confidential documents (1.8); communications with Joe Vance re application of protective order to document production and exclusion of documents stamped highly confidential (.5); emails with Bridget Donegan re ShareFile links to receiver's productions and request to review protective order and execute confidentiality agreement and acknowledgement (.3)
08/26/22	J. Vance	6.5	Telephone call with Hannah Schmidt re discovery (.3); exchange communications with Lisa Peterson re discovery issues (.5); prepare deposition notice and exchange communications with opposing counsel re scheduling depositions (.5); research issues related to discovery (2.5); analyze draft findings of expert (2.7)
08/28/22	E. Mills	0.7	Review potential exhibits and draft outline for deposition of Greg Usselman
08/29/22	E. Decker	1.0	Virtual meeting with Joe Vance to discuss strategy for depositions (.5); virtual meeting with Nick Miller to discuss privilege logs (.1); analyze discovery letters and emails from Pacific Premier Bank counsel (.4)
08/29/22	N. Miller	0.1	Virtual meeting with Edward Decker to discuss privilege logs
08/29/22	E. Mills	0.8	Review potential exhibits and draft outline for deposition of Greg Usselman
08/29/22	L. Peterson	1.0	Review database and prepare certain loan files re La Pine for review by Joe Vance
08/29/22	J. Vance	8.0	Virtual meeting with Edward Decker (.5); analyze correspondence from Shannon Armstrong re discovery (.5); review draft expert report (4.0); prepare deposition outlines (3.0)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/30/22	E. Decker	3.6	Virtual meeting with Joe Vance, Eric Mills, and Lorien Giles to discuss written discovery and plan for depositions (.5); virtual meeting with Joe Vance to prepare for upcoming conferral with Pacific Premier Bank re interrogatories (.9); assess strength of Pacific Premier Bank's arguments re receiver's interrogatory responses and plan responses (1.5); research case law relied on by Pacific Premier Bank (.7)
08/30/22	E. Mills	2.6	Review potential exhibits and draft outline for deposition of Greg Usselman (2.1); virtual meeting with Joe Vance, Ed Decker, and Lorien Giles (.5)
08/30/22	L. Peterson	3.1	Incorporate loan files re La Pine in ShareFile and email link to expert (.2); update tracking chart (.1); search databases re RMV documents and email to Hannah Schmidt re same (1.0); communications with Joe Vance and Heather Harmon re produced images (.3); review and organize signed acknowledgements of stipulated protective order in electronic file (.6); download and organize Riverview Bank's supplemental production, and prepare instructions for inclusion in electronic database (.4); respond to emails from Christine Ortez re requested passwords for Pacific Premier Bank productions (.5)
08/30/22	J. Vance	4.5	Virtual meeting with Edward Decker, Eric Mills, and Lorien Giles (.5); virtual meeting with Edward Decker (.9); prepare for depositions (3.1)
08/31/22	E. Decker	2.2	Virtual meeting with Lisa Peterson to discuss responses to Pacific Premier Bank's interrogatories and privilege logs (.4); revise draft privilege log for receiver's emails (.6); research draws on Pacific Premier Bank line of credit for supplemental interrogatory responses (.7); draft supplemental interrogatory responses (.5)
08/31/22	D. Foraker	0.1	Email to Chris Kayser, Mike Esler, Hannah Schmidt et al re cancellation of 9/5 bi-monthly meeting
08/31/22	E. Mills	5.8	Review potential exhibits and draft outline for deposition of Greg Usselman

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/31/22	L. Peterson	0.9	Continue research re RMV documents (.5); virtual meeting with Edward Decker to discuss responses to Pacific Premier Bank's interrogatories and privilege logs (.4)
08/31/22	J. Vance	3.2	Prepare for depositions

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. Knapp	Partner	1.6	595	952.00
J. Vance	Partner	70.8	550	38,940.00
E. Decker	Partner	46.3	475	21,992.50
E. Mills	Associate	18.8	410	7,708.00
L. Peterson	Paralegal	66.2	280	18,536.00
N. Miller	Paralegal	18.1	250	4,525.00
H. Harmon	Paralegal	1.6	225	360.00
Summary Total:		225.0		\$94,021.50

Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Streamline Imaging: Relatively production set processing, data storage, relatively users	3,578.26
Disbursement Total:	\$3,578.26

Invoice Summary

Professional Fees Through August 31, 2022	\$94,021.50
Disbursements	\$3,578.26
Amount Due - Current Period:	\$97,599.76



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: 2193158
September 8, 2022

Invoice Summary

Professional Fees Through August 31, 2022	\$3,034.50
Disbursements	<u>\$0.00</u>
Amount Due – Current Period:	<u>\$3,034.50</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>
08/01/22	J. Knapp	0.1	Emails with John Rake re class action settlement agreement and partial judgment
08/02/22	J. Knapp	0.5	Review comments on class action settlement agreement and partial judgment from John Rake (.4); emails with John Rake re same (.1)
08/03/22	J. Knapp	0.2	Emails with John Stephens re class action settlement agreement and partial judgment
08/04/22	J. Knapp	0.1	Emails with John Rake re class action settlement agreement and partial judgment
08/05/22	J. Knapp	0.9	Review and comment on class action partial judgment (.5); emails with John Rake re same (.4)
08/08/22	J. Knapp	0.3	Emails with John Rake re partial judgment (.1); emails with Hannah Schmidt and Clyde Hamstreet re partial judgment (.2)
08/09/22	J. Knapp	0.6	Emails with Hannah Schmidt re partial judgment (.3); review and comment on partial judgment (.3)
08/10/22	J. Knapp	1.0	Emails with Hannah Schmidt re partial judgment (.1); emails with John Rake re partial judgment (.4); review and comment on partial judgment (.2); emails with Bridget Donegan re Beattie settlement agreement (.3)
08/11/22	J. Knapp	0.1	Emails with Bridget Donegan re Beattie plaintiffs settlement agreement
08/16/22	J. Knapp	0.7	Emails with Bridget Donorgan re Beattie plaintiffs settlement agreement (.3); review and comment on Beattie plaintiffs settlement agreement (.4)
08/30/22	J. Knapp	0.6	Review final versions of class settlement agreement, partial judgment of dismissal, and bar order (.3); emails with Clyde Hamstreet re same (.3)

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
J. Knapp	Partner	5.1	\$595	\$3,034.50
Summary Total:		5.1		\$3,034.50

Invoice Summary

Professional Fees Through August 31, 2022	\$3,034.50
Disbursements	<u>\$0.00</u>
Amount Due - Current Period:	<u>\$3,034.50</u>



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

Account: 721921.0023
Adjunct Litigation Claims Against Ridgecrest Development III

Invoice: 2193088
September 6, 2022

Invoice Summary

Professional Fees Through August 31, 2022	\$255.00
Disbursements	<u>\$0.00</u>
Amount Due – Current Period:	<u>\$255.00</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.

Invoice Detail

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
08/30/22	G. Ledgerwood	0.5	Review request from lender to release judgment lien; research regarding affiliation of lender to judgment debtor; follow up with lender's counsel and Hannah Schmidt re same

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
G. Ledgerwood	Partner	0.5	\$510	\$255.00
Summary Total:		0.5		\$255.00

Invoice Summary

Professional Fees Through August 31, 2022	\$255.00
Disbursements	<u>\$0.00</u>
Amount Due - Current Period:	<u>\$255.00</u>

EXHIBIT C



SPECIALIZED
FORENSIC
INVESTIGATIONS

Invoice

Specialized Forensic Investigations LLC

5701 Lonetree Blvd., Suite 212
Rocklin, CA 95765

Invoice Date:	Invoice #:
9/1/2022	1709

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
10/1/2022	Hamstreet & Associates	

Date	Description	Hours	Rate	Amount
8/5/2022	Investigation	0.8	300.00	240.00
8/5/2022	Review of legal filings re: banks			
8/5/2022	Phone call	1.1	300.00	330.00
8/29/2022	Preparation for and call with Hamstreet			
8/29/2022	Investigation	0.8	300.00	240.00
8/29/2022	Review and analyze reports from Hamstreet and Ueltzen			
8/29/2022	Phone call	0.9	300.00	270.00
8/29/2022	Preparation for and call with Hamstreet and Ueltzen			

Thank you for your business.	Total	\$1,080.00
	Payments/Credits	\$0.00
	Balance Due	\$1,080.00

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
August 2022 Services

Date	Description	Person	Hours	Rate	Amount
8/28/2022	Download and review files and email correspondence	MU	2.3	450.00	\$ 1,035.00
8/29/2022	Preparation and call with team	MU	1.6	450.00	720.00
8/31/2022	Review and download key files	MU	<u>1.6</u>	450.00	<u>720.00</u>
	Total Fees		<u>5.5</u>		<u>\$ 2,475.00</u>

EXHIBIT E

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
03/31/2022	22353
Terms	Service Through
	03/31/2022

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

Date	By	Services	Hours	Rates	Amount
03/14/2022	BR	Draft: revisions to Hart listing agreement in English and Spanish. Email comments to Hannah.	1.00	\$ 350.00/hr	\$ 350.00
03/15/2022	DV/LB	Review Listing Agreement (create clean version)	0.40	\$ 50.00/hr	\$ 20.00
03/15/2022	BR	Follow up: Hannah re Hart listing agreement. Draft revisions in English and Spanish. Email to client.	0.50	\$ 350.00/hr	\$ 175.00
03/19/2022	BR	Telephone call: Jim Hart re: listing agreement.	0.25	\$ 350.00/hr	\$ 87.50
03/22/2022	DV/LB	East Cape Listing: request and review East Trend Dev corporate information. Add new information to the listing agreement.	0.90	\$ 50.00/hr	\$ 45.00
03/22/2022	BR	Communications: Daniela re title insurance, listing agreement.	0.30	\$ 350.00/hr	\$ 105.00
03/30/2022	DV/LB	Coordination for Title Commitment East cape	0.80	\$ 50.00/hr	\$ 40.00
03/31/2022	DV/LB	Team call re: general meeting	0.50	\$ 50.00/hr	\$ 25.00

Total Hours 4.65 hrs
Total Legal fees \$ 847.50
Total Amount \$ 847.50

In Reference To: General (Legal fees)

Date	By	Services	Hours	Rates	Amount
03/04/2022	DV/LB	Villa Montaña Closing: review escrow agreement	0.40	\$ 100.00/hr	\$ 40.00
03/04/2022	DV/LB	Sea Breeze Closing: coordinating notary meeting	1.50	\$ 100.00/hr	\$ 150.00

03/15/2022	DV/LB	Coordinate payment of Property Taxes	0.80	\$ 100.00/hr	\$ 80.00
03/17/2022	BR	Communications: Daniela re Ray Corona case and draft reply to reply prepared by David Reyes; review same.	0.35	\$ 350.00/hr	\$ 122.50
03/22/2022	DV/LB	Corona lawsuit: update email to client and Expert appraisal coordination	0.60	\$ 100.00/hr	\$ 60.00
03/22/2022	BR	Communications: Salvador re tax matters; Daniela re Corona and Hines matters.	0.35	\$ 350.00/hr	\$ 122.50
03/23/2022	BR	Review: and draft revisions to OTP for Tamar unit. Emails Hannah. Phone call Daniela re Hines and Corona.	0.90	\$ 350.00/hr	\$ 315.00
03/23/2022	BR	Communications: Phone call and Emails Daniela, David R. re: Corona reply, motion and next steps/strategy. Sign briefs. Call Daniela re Hines status.	0.60	\$ 350.00/hr	\$ 210.00
03/30/2022	DV/LB	Internal Call BR-DV - general update // Email to Hamstreet team re: Coronas update // Coordination shipment of Sea Breeze apostilles from California to RL office	1.50	\$ 100.00/hr	\$ 150.00
03/31/2022	BR	Local Management & Banking Support (AEMEMMX S DE RL DE CV) March, 2022	Flat Fee	\$ 200.00	\$ 200.00
03/31/2022	DV/LB	Coordinating technical accounting: communications with accountant and requesting client's docs	0.50	\$ 100.00/hr	\$ 50.00

In Reference To: General (Expenses)

Date	By	Expenses	Amount
03/04/2022	BR	Notary Fees: FABRO - Notarization of Signatures, Travel Fee & Apostille Fees	\$ 253.00
03/15/2022	BR	Mailing/Postage: DHL shipping, Doc to Rojas & Asociados RE: Valerio MXN\$516.56 Fx\$19.00	\$ 27.18

Total Hours	7.50 hrs
Total Legal fees	\$ 1,500.00
Total Expenses	\$ 280.18
Total Amount	\$ 1,780.18

Total Hours	12.15 hrs
Total Legal fees	\$ 2,347.50
Total Expenses	\$ 280.18
Total Invoice Amount	\$ 2,627.68

Notes:

Thank you in advance for your prompt payment.

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
08/31/2022	22453
Terms	Service Through
	08/31/2022

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

Date	By	Services	Hours	Rates	Amount
08/03/2022	BR	Communications: Discussions and correspondence notary, internal re: arguments to be made to Public Registry re: transfer tax issue.	0.60	\$ 350.00/hr	\$ 210.00
08/05/2022	BR	Communications: Meeting Notary and Registrar re: making case that no transfer tax should be due on Mar de Plata Trust Deed in Lieu. Prep for meeting; review arguments and documentation. Follow up. Brief Hannah.	2.50	\$ 350.00/hr	\$ 875.00
08/08/2022	DV/LB	Prepare and circulate PTT for Lots 21 and 23	1.00	\$ 50.00/hr	\$ 50.00
08/11/2022	DV/LB	Development weekly call	0.40	\$ 50.00/hr	\$ 20.00
08/12/2022	DV/LB	Communications with buyer Lot 21.	0.30	\$ 50.00/hr	\$ 15.00
08/15/2022	DV/LB	Communications with team re: installment note // Fill installment note for Lot 21 buyer	0.50	\$ 50.00/hr	\$ 25.00
08/18/2022	DV/LB	Development weekly call	0.35	\$ 50.00/hr	\$ 17.50
08/29/2022	DV/LB	Development Team Call	0.50	\$ 50.00/hr	\$ 25.00

Total Hours 6.15 hrs
Total Legal fees \$ 1,237.50
Total Amount \$ 1,237.50

In Reference To: General (Legal fees)

Date	By	Services	Hours	Rates	Amount
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08/11/2022	BR	Communications: Daniela, Hannah re: Tamar early possession and PoT. Review and respond to correspondence. Structure docs with Daniela.	0.75	\$ 350.00/hr	\$ 262.50
08/12/2022	DV/LB	Tamar 201 Soft Closing: communications to coordinate details with all parties + Draft Soft Closing agreements package	3.00	\$ 100.00/hr	\$ 300.00
08/12/2022	DV/LB	Tamar 201 Soft Closing Coordination: Call with BR / Review docs / Communications with Buyer's attorneys	1.00	\$ 100.00/hr	\$ 100.00
08/12/2022	BR	Draft: revisions to Tamar soft closing docs. Confer with Daniela re: same.	1.00	\$ 350.00/hr	\$ 350.00
08/15/2022	DV/LB	Communications: Tamar 201 soft closing - Communications with closing attorneys	0.50	\$ 100.00/hr	\$ 50.00
08/15/2022	BR	Conference call: Agency Los Cabos re: Todos Santos project, possible listing.	0.50	\$ 350.00/hr	\$ 175.00
08/16/2022	DV/LB	Review, correct and coordinate execution of listing agreements for Tamar 100, 200 and 201	0.50	\$ 100.00/hr	\$ 50.00
08/16/2022	BR	Communications: re Tamar soft closing.	0.20	\$ 350.00/hr	\$ 70.00
08/16/2022	BR	Communications: Daniela re Tamar soft closing.	0.20	\$ 350.00/hr	\$ 70.00
08/16/2022	BR	Communications: Review The Agency correspondence re: Todos Santos.	0.25	\$ 350.00/hr	\$ 87.50
08/18/2022	BR	Meeting: to execute Tamar soft closing docs.	0.35	\$ 350.00/hr	\$ 122.50
08/23/2022	BR	Communications: Daniela, Hannah re: Tamar closing/Escrow. Review correspondence and docs.	0.25	\$ 350.00/hr	\$ 87.50
08/24/2022	DV/LB	visit to public registry to follow up on registration of Tamar deed	2.00	\$ 100.00/hr	\$ 200.00
08/25/2022	DV/LB	Tamar 201 - follow up after soft closing // Tamar 100 - communications regarding buyer's interest in soft closing	1.00	\$ 100.00/hr	\$ 100.00
08/26/2022	BR	Communications: closing attorneys re new KYC requirements.	0.20	\$ 350.00/hr	\$ 70.00
08/30/2022	DV/LB	Visit the Public Registry re: follow up on Tamar Deed recording	1.00	\$ 100.00/hr	\$ 100.00
08/30/2022	BR	Communications: Hannah re: tax planning and compliance advice, repatriating available cash; consult with Palomino.	0.35	\$ 350.00/hr	\$ 122.50
08/30/2022	BR	Communications: Phone call Janet re: Todos Santos. Brief Hannah re: same.	0.50	\$ 350.00/hr	\$ 175.00
08/31/2022	BR	Local Management & Banking Support (AEMEMMX S DE RL DE CV) Aug, 2022	Flat Fee	\$ 200.00	\$ 200.00

Total Hours	13.55 hrs
Total Legal fees	\$ 2,692.50
Total Amount	\$ 2,692.50

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

Date	By	Services	Hours	Rates	Amount
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08/01/2022	ME	Conference call: Conference call with Pilar Garcia Not 17, Ben Rosen and Daniela Velazquez re. tax assesment for trust agreement.	0.75	\$ 190.00/hr	\$ 142.50
08/01/2022	BR	Communications: Concall Notary and Team re: transfer tax issue.	0.50	\$ 350.00/hr	\$ 175.00
08/02/2022	BR	Draft: email memorandum re: our legal position on tax issue related to Mar de Plata Trust. Follow up notary, internal. Phone call Valerio. Research law.	2.30	\$ 350.00/hr	\$ 805.00
08/05/2022	BR	Draft: Financing and Cash Discount Addendum. Email to Hannah. Follow up. Review PTT, update.	3.00	\$ 350.00/hr	\$ 1,050.00
08/08/2022	BR	Communications: Zoom meeting Hannah and Daniela, follow up Daniela re: Financing Addendum, PTT, formats; draft revisions to and email addendum.	1.50	\$ 350.00/hr	\$ 525.00
08/11/2022	BR	Communications: Draft Promissory Note for financing deals. Internal discussions re: closing sytems and templates for lot sales.	0.75	\$ 350.00/hr	\$ 262.50
08/12/2022	BR	Draft: promissory note template in English and Spanish for Financing Option; confer with Hannah re: same. Follow up Daniela re: templates.	2.00	\$ 350.00/hr	\$ 700.00

Total Hours	10.80 hrs
Total Legal fees	\$ 3,660.00
Total Amount	\$ 3,660.00

Total Hours	30.50 hrs
Total Legal fees	\$ 7,590.00
Total Invoice Amount	\$ 7,590.00

Notes:

Thank you in advance for your prompt payment.