

E-FILED

10-12-2022, 09:38

Honorable Da. **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 (AUGUST AND
SEPTEMBER 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
(AUGUST AND SEPTEMBER 2022) - 1

4857-4062-3926.1

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 (August and September
4 2022) in accordance with Paragraph 11 of the Order Appointing General Receiver dated May 10,
5 2019 (the “Receivership Order”), which provides in part: “The Receiver and the Receiver’s
6 authorized attorneys and other professionals may request to be compensated on an interim or
7 final basis.”

8 RCW 7.60.180(4) further provides:

9 The receiver, and any professionals employed by the
10 receiver, is permitted to file an itemized billing statement with the
11 court indicating both the time spent, billing rates of all who perform
12 work to be compensated, and a detailed list of expenses and serve
13 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.

14 Attached as Exhibit A hereto is a true and correct copy of the Receiver’s time and
15 expense summary for services and costs in September 2022. For this period, the Receiver
16 requests final approval of its compensation in the amount of \$32,567.50 and reimbursement of
17 costs of \$12.00, for a total payment of \$32,579.50.

18 Attached as Exhibit B hereto is a true and correct copy of the time and expense summary
19 of the Receiver’s authorized attorneys, Miller Nash LLP, for services and costs in September
20 2022. For this period, such attorneys request final approval of their compensation in the amount
21 of \$144,258.00 and reimbursement of costs of \$2,359.90, for a total payment of \$146,617.90.

22 Attached as Exhibit C hereto is a true and correct copy of the time and expense summary
23 of the Receiver’s authorized forensic accountants Specialized Forensic Investigations LLC, for
24 services and costs in September 2022. For this period, such forensic accountants request final
25 approval of their compensation in the amount of \$1,080.00 and reimbursement of no costs, for a
26 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 September 2022. For this period, such forensic accountant requests final approval of his
4 compensation in the amount of \$2,565.00 and reimbursement of no costs, for a total payment of
5 \$2,565.00.

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 August and September 2022. For this period, such consultants request final
9 approval of their compensation in the amount of \$192.50 and reimbursement of no costs, for a
10 total payment of \$192.50.

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 September 2022. For this period, such attorneys request final approval of their compensation
14 in the amount of \$3,533.00 and reimbursement of no costs, for a total payment of \$3,533.00.

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 October 25, 2022, the Receiver may make the
17 payments requested herein and/or the professionals may apply their retainers, if any.

18 DATED this 12th day of October 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

October 7, 2022

Invoice # 2572

Professional Services

			<u>Hours</u>	<u>Amount</u>
9/7/2022	MA	Advisory Services Email Walt Snyder to check on cleanup progress. Call Evergreen and order dumpsters to be hauled.	0.20	65.00
9/8/2022	HS	Litigation Support Call with Joe Vance.	0.30	150.00
	HS	Litigation Support Continue review of draft Stoley report.	0.70	350.00
	HS	Receivership Duties Call with Daniela Velazquez and Veronica Hamstreet regarding Todos Santos and Mar de Plata.	0.30	150.00
	HS	Receivership Duties Read and respond to emails received from 8/31 to 9/7. Meet with Clyde Hamstreet and review case.	5.00	2,500.00
	CAH	Receivership Duties Review progress on case with Hannah Schmidt, including suit against Riverview and Pacific Premier banks; progress on settlement and potential for distributions. Review progress on Mexico properties.	1.20	720.00
9/9/2022	HS	Litigation Support Prepare for and call with Joe Vance, Mike Ueltzen and Paul Artley.	2.00	1,000.00
	MA	Advisory Services Call Evergreen to get an update on the dumpsters; relay schedule to Walt Snyder.	0.10	32.50
	MC	Litigation Support Review Stoley report.	1.00	150.00
9/12/2022	HS	Receivership Duties Read and respond to emails.	0.50	250.00

			<u>Hours</u>	<u>Amount</u>
9/13/2022	HS	Litigation Support Call with Martha Cohn regarding review of drafts.	0.30	150.00
	HS	Litigation Support Review information related to damages. Discuss case with Clyde Hamstreet.	7.50	3,750.00
	MA	Advisory Services Follow up call with Evergreen to get an update on the dumpsters; relay information to Walt Snyder.	0.10	32.50
	MC	Litigation Support Call with Hannah Schmidt; review Stoley report.	1.20	180.00
	CAH	Receivership Duties Review various aspects of case with Hannah Schmidt including upcoming depositions, legal cost, Mexico properties issues and litigation recovery ranges.	1.30	780.00
9/14/2022	HS	Litigation Support Call with Rod Werhan.	0.50	250.00
	HS	Litigation Support Review and sign declaration for the class.	0.50	250.00
	HS	Litigation Support Research and respond to questions from Joe Vance.	2.40	1,200.00
	HS	Litigation Support Review draft of Stoley report.	2.70	1,350.00
	MA	Advisory Services Call from Evergreen; email status to Walt Snyder.	0.20	65.00
9/15/2022	HS	Investor Relations Call with Paula Palidini.	0.40	200.00
	HS	Litigation Support Continuer review draft of Stoley report.	1.00	500.00
	MC	Litigation Support Continue to review Stoley report.	1.70	255.00
9/16/2022	MA	Advisory Services Call from Evergreen with schedule update; email status to Walt Snyder.	0.10	32.50
	MC	Litigation Support Continue to review Stoley report.	2.50	375.00
9/17/2022	MC	Litigation Support Continue to review Stoley report.	0.70	105.00
9/18/2022	MC	Litigation Support Continue to review Stoley report.	0.50	75.00

			<u>Hours</u>	<u>Amount</u>
9/19/2022	HS	Litigation Support Call with joint litigation team. Coordinate declaration for Bridget Donegan.	0.50	250.00
	HS	Receivership Duties Read and respond to emails.	0.90	450.00
	MC	Litigation Support Continue to review Stoley report.	2.40	360.00
9/20/2022	HS	Receivership Duties Respond to AEMReceiver email account.	0.30	150.00
	HS	Receivership Duties Review and sign note extension for Hinojosa. Call with Sharon Kennedy regarding extension.	0.50	250.00
	HS	Pacific Premier Bank Review draft interrogatory responses and send comments to Edward Decker.	2.40	1,200.00
	HS	Litigation Support Continue review of Stoley draft. Calls with Martha Cohn and Joe Vance regarding same.	4.50	2,250.00
	MC	Litigation Support Call with Hannah Schmidt on report.	0.20	30.00
9/21/2022	HS	Litigation Support Discuss case status with Clyde Hamstreet.	0.50	250.00
	HS	Litigation Support Call with Stoley team and Joe Vance and Clyde Hamstreet regarding expert findings.	1.00	500.00
	HS	Receivership Duties Read and respond to emails. Begin work on 2nd distribution.	1.10	550.00
	CAH	Receivership Duties Discuss case status with Hannah Schmidt. Call with Stoley team, Joe Vance and Hannah Schmidt.	1.00	600.00
9/22/2022	HS	Receivership Duties Call with Veronica Hamstreet, Evelyn Torres and Daniela Valazquez regarding Todos Santos and Mar de Plata.	0.50	250.00
	HS	Receivership Duties Call with Jesus Palomares regarding DOT question. Respond to email from Ken McQuhae.	0.20	100.00
	HS	Receivership Duties Prepare for 2nd distribution. Work on cash flow budget through end of litigation and update claims schedule.	2.80	1,400.00

			<u>Hours</u>	<u>Amount</u>
9/22/2022	HS	Litigation Support Prepare for and call with Paul Artley and Mike Ueltzen regarding damages. Follow up work regarding same.	2.50	1,250.00
	MA	Advisory Services Call from Evergreen to verify that the dumpsters had in fact been emptied.	0.10	32.50
	MA	Advisory Services Email status update to Hannah Schmidt; email update to Walt Snyder.	0.30	97.50
9/23/2022	CAH	Receivership Duties Sign documents in front of notary. Discuss offer to purchase debt instrument in 15 acres of WA land by Ken McQuay. Discuss trial schedules and Cabo visit.	1.10	660.00
9/26/2022	HS	Litigation Support Calls with Edward Decker and Damian Platoch regarding discovery.	0.40	200.00
9/27/2022	HS	Litigation Support Emails with John Rake regarding class distributions.	0.20	100.00
	HS	Receivership Duties Emails regarding Gobel Creek settlement and Harvest Moon claims transfers.	0.80	400.00
9/28/2022	HS	Litigation Support Attend Usselman deposition, discussions with Joe Vance and Edward Decker regarding deposition.	7.50	3,750.00
	MA	Advisory Services Phone calls with Evergreen and Walt Snyder to coordinate dumpster hauling and relocation.	1.00	325.00
9/29/2022	HS	Receivership Duties Read and respond to emails.	0.50	250.00
	HS	Litigation Support Email to Edward Decker and Joe Vance regarding Hawkes letter.	1.20	600.00
	HS	Litigation Support Emails regarding getting Evergreen data to produce.	0.30	150.00
9/30/2022	HS	Receivership Duties Discuss AEM matters and deposition with Clyde Hamstreet.	0.50	250.00
	FM	Administrative Services July and August reconciliation.	4.20	630.00
	MA	Advisory Services Phone call to Shawna Norry's office regarding property cleanup.	0.20	65.00
	CAH	Receivership Duties Catch up on deposition and other AEM matters with Hannah Schmidt.	0.50	300.00

For professional services rendered

<u>Hours</u>	<u>Amount</u>
75.00	\$32,567.50

Additional Charges :

9/28/2022 Parking expense for Hannah Schmidt for Usselman deposition.

<u>Price</u>	<u>Qty</u>	
\$12.00	1	12.00

Total additional charges

\$12.00

Total amount of this bill

\$32,579.50

Accounts receivable transactions

10/4/2022 Payment invoice #2565- Thank You. Check No. 1641

(\$18,465.00)

Total payments and adjustments

(\$18,465.00)

Balance due

\$32,579.50

Consultant Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Clyde A. Hamstreet - Principal	5.10	600.00	\$3,060.00
Hannah Schmidt - Consultant	53.20	500.00	\$26,600.00
Martha Cohn - Jr. Consultant	10.20	150.00	\$1,530.00
Matthew Alford - Consultant	2.30	325.00	\$747.50
Felicia Muli	4.20	150.00	\$630.00

EXHIBIT B

Client.Matter	Description	Bill Amt	Fees	Costs	Bill Num
721921.0001	American Eagle Mortgage Investment Funds	\$9,107.00	\$9,107.00	\$0.00	2195196
721921.0017	Adjunct Litigation Claims Against Ross Miles, Maureen Wile, et al.	\$135,071.90	\$132,712.00	\$2,359.90	2195197
721921.0019	Investigation of Adjunct Litigation Claims Against AEI/AEMM Lenders	\$2,439.00	\$2,439.00	\$0.00	2195198
		\$146,617.90	\$144,258.00	\$2,359.90	



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: 2195196
October 10, 2022

Invoice Summary

Professional Fees Through September 30, 2022	\$9,107.00
Disbursements	<u>\$0.00</u>
Amount Due – Current Period:	<u>\$9,107.00</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>
09/02/22	J. Knapp	0.7	Emails with Michael Ueltzen re notice of intent to compensate (August 2022) (.2); draft notice of intent to compensate (August 2022) (.5)
09/06/22	J. Knapp	0.4	Emails with Paul Artley re notice of intent to compensate (August 2022) (.2); continue drafting notice of intent to compensate (August 2022) (.2)
09/07/22	J. Knapp	0.3	Review court docket (.1); email communications with Hannah Schmidt re no objections to Tamar #200 sale notice (.2)
09/08/22	J. Palomares	0.5	Telephone conference with Hannah Schmidt re payoff for Bauman Trust foreclosure (.2); exchange emails with Bauman Trust foreclosure trustee re letters from trust beneficiaries requesting postponement (.3)
09/09/22	J. Knapp	0.5	Emails with Veronica Hamstreet re notice of intent to compensate (August 2022) (.2); continue drafting notice of intent to compensate (August 2022) (.3)
09/11/22	J. Knapp	0.6	Emails with Rosen Law billing department re notice of intent to compensate (.2); continue drafting notice of intent to compensate (August 2022) (.3); emails with Hannah Schmidt re notice of intent to compensate (August 2022) (.1)
09/12/22	H. Harmon	0.2	Coordinate ex parte presentation of motion, declaration, and order approving receiver's sale of Tamar #200
09/12/22	J. Knapp	0.7	Continue drafting notice of intent to compensate (.1); draft ex parte motion to approve Tamar #200 sale, supporting declaration of John Knapp, and proposed order granting motion (.5); emails with Hannah Schmidt re message from investor (.1)
09/13/22	D. Foraker	1.3	Review email from Hannah Schmidt re second interim distribution to investors, review receivership case filings, and related emails (.8); work on fee budget for September 2022 through June 2023 (.5)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
09/13/22	H. Harmon	0.1	Obtain conformed copies of motion, declaration, and order approving receiver's sale of Tamar #200
09/13/22	J. Knapp	1.6	Finalize notice of intent to compensate (August 2022) (.6); emails with David Foraker and Hannah Schmidt re second interim investor distribution (.3); emails with Naureen Khan re transmittal of notice of intent to compensate (August 2022) for uploading to website (.1); emails with Heather Harmon re Tamar #200 sale filings (.2); review entered sale order for Tamar #200 and filed motion and declaration (.1); emails with Naureen Khan re transmittal of Tamar #200 court filings for posting to website (.2); emails with Hannah Schmidt re court approval of Tamar #200 sale (.1)
09/14/22	J. Knapp	0.1	Emails with Naureen Khan re posting of court filings to website
09/21/22	J. Knapp	0.1	Emails with Hannah Schmidt re Al Elkins claim transfer
09/21/22	N. Levy	0.3	Review Ken McQuhae deed in lieu issue re Rose Valley property (.2); email with Jesus Palomares re same (.1)
09/22/22	D. Foraker	0.3	Emails with Joe Vance, John Knapp, and Hannah Schmidt re fee budget for September 2022 through June 2023
09/22/22	J. Knapp	1.7	Prepare non-litigation fee budget for September 2022 through June 2023 (.7); emails with Hannah Schmidt and David Foraker re budget and upcoming action items (.7); emails with Hannah Schmidt re Ken McQuhae settlement (.3)
09/22/22	J. Palomares	0.3	Review and analyze Ken McQuhae deed re merger doctrine issues
09/22/22	J. Vance	0.5	Prepare litigation budget for September 2022 through June 2023 and related emails
09/25/22	J. Knapp	1.6	Begin drafting motion to approve second interim distribution to investors

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
09/26/22	D. Foraker	0.1	Emails with Joe Vance re expert fee estimates for receiver's budget
09/26/22	J. Knapp	0.6	Review Harvest Moon Investments claim transfer documentation (.2); review claims register and order fixing allowed amounts of investor claims (.2); emails with Hannah Schmidt re Harvest Moon Investments claim transfer issues (.2)
09/27/22	J. Knapp	0.5	Emails with Hannah Schmidt re Harvest Moon Investments claim transfer (.3); review court docket (.1); emails with Hannah Schmidt re no objections to notice of intent to compensate (August 2022) (.1)
09/29/22	J. Knapp	0.8	Review letter from Cherrelle Swainston re Shannon loan and property (.1); emails with Hannah Schmdit re same (.2); emails with Hannah Schmidt re Harvest Moon Investments claim transfer issues (.5)
09/30/22	J. Knapp	1.9	Emails with Hannah Schmidt re Harvest Moon Investments claim transfer and notice of intent to compensate (August 2022) (.2); draft settlement agreement for Ken McQuhae re American Securities real property (1.5); related emails with Hannah Schmidt re settlement agreement (.2)

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
D. Foraker	Partner	1.7	\$630	\$1,071.00
J. Knapp	Partner	12.1	595	7,199.50
J. Vance	Partner	0.5	550	275.00
J. Palomares	Partner	0.8	475	380.00
N. Levy	Associate	0.3	380	114.00
H. Harmon	Paralegal	0.3	225	67.50
Summary Total:		15.7		\$9,107.00

Account: 721921

Invoice: 2195196

October 10, 2022

Invoice Summary

Professional Fees Through September 30, 2022	\$9,107.00
Disbursements	<u>\$0.00</u>
Amount Due - Current Period:	<u>\$9,107.00</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: 2195197
October 10, 2022

Invoice Summary

Professional Fees Through September 30, 2022	\$132,712.00
Disbursements	<u>\$2,359.90</u>
Amount Due – Current Period:	<u>\$135,071.90</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>
09/01/22	E. Decker	0.9	Analyze legal research results
09/01/22	L. Giles	6.5	Legal research and draft file memorandum
09/01/22	E. Mills	0.4	Review and analyze potential exhibits for Greg Usselman deposition
09/01/22	L. Peterson	0.5	Communications with Heather Harmon re collecting of potential exhibits for Greg Usselman deposition
09/01/22	J. Vance	3.5	Communications with Chip Paternoster and Shannon Armstrong re discovery and scheduling (.8); telephone call with Hannah Schmidt re status and strategy (.2); prepare for depositions (2.5)
09/02/22	E. Decker	0.4	Draft supplemental interrogatory responses to Pacific Premier Bank
09/02/22	L. Giles	5.8	Legal research
09/02/22	L. Peterson	0.8	Review and respond to email from Joseph Vance re production of document in response to subpoenas (.1); review emails from Karri Speck and download and organize productions from Pacific Premier Bank of documents from Columbia Bank and IQ Credit Union, and prepare instructions for inclusion of documents in electronic database (.7)
09/02/22	J. Vance	0.6	Review communications from defendants re discovery matters
09/05/22	J. Vance	5.0	Prepare deposition outline for Greg Usselman deposition
09/06/22	E. Decker	0.9	Analyze corporate representative topics circulated by counsel for Pacific Premier Bank (.5); virtual meeting with Lorien Giles to discuss legal research project (.4)
09/06/22	L. Giles	5.6	Continue legal research (5.2); virtual meeting with Edward Decker re same (.4)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
09/06/22	L. Peterson	0.6	Review receiver's responses to Pacific Premier Bank's interrogatories
09/06/22	B. Shattuck	2.0	Read operative complaint and mediation statement
09/07/22	E. Decker	1.1	Virtual meeting with Joseph Vance, Eric Mills, Lorien Giles, and Ben Shattuck to discuss document discovery, upcoming depositions, and research projects (.5); virtual meeting with Nick Miller to discuss privilege logs (.2); revise draft privilege logs (.4)
09/07/22	L. Giles	2.7	Legal research (2.2); virtual meeting with Joseph Vance, Edward Decker, Eric Mills, and Ben Shattuck (.5)
09/07/22	L. Peterson	0.5	Email to Edward Decker and Joseph Vance re documents responsive to Pacific Premier Bank's interrogatories Nos. 24 and 25
09/07/22	B. Shattuck	2.2	Virtual meeting with Joseph Vance, Edward Decker, Eric Mills, and Lorien Giles (.5); legal research (1.7)
09/07/22	J. Vance	8.0	Telephone call with Greg Usselman's attorney re deposition (.2); telephone call with Chip Paternoster re pretrial deadlines (.2); virtual meeting with Edward Decker, Eric Mills, Lorien Giles, and Ben Shattuck re document discovery, upcoming depositions, and research projects (.5); prepare for depositions (7.1)
09/08/22	E. Decker	3.5	Virtual meeting with Joseph Vance to prepare for conferral with Pacific Premier Bank (.3); prepare for conferral call with Pacific Premier Bank (.5); discovery conferral call with Pacific Premier Bank (.5); virtual meeting with Joseph Vance to discuss research issues (.2); virtual meeting with Lorien Giles to discuss research project (.2); virtual meeting with Ben Shattuck to discuss research project (.3); draft supplemental responses to Pacific Premier Bank's interrogatories (1.5)
09/08/22	L. Giles	6.6	Legal research and draft file memorandum (6.3); virtual meeting with Edward Decker re research project (.3)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
09/08/22	H. Harmon	0.4	Prepare amended notice of deposition and deposition subpoena for Greg Usselman and prepare for distribution (.2); revise court reporter and videographer arrangements (.1); update case docketing (.1)
09/08/22	L. Peterson	1.6	Review and respond to email from Stacey Miller requesting copy of third supplemental responses to Pacific Premier Bank's discovery requests (.2); prepare field coding summaries of Columbia Bank and IQ Credit Union documents (.2); email to Joseph Vance and Edward Decker re Columbia Bank and IQ Credit Union documents (.1); review email from Charles Paternoster re clawback of RCB document and delete all electronic copies of document (.8); email to Joseph Vance confirming deletion of RCB document (.1); incorporate Columbia Bank and IQ Credit Union documents in ShareFile for expert and email link (.2)
09/08/22	J. Vance	6.0	Virtual meeting with Edward Decker to prepare for conferral with Pacific Premier Bank (.3); discovery conferral call with Pacific Premier Bank (.5); virtual meeting with Edward Decker (.2); exchange communications with Hannah Schmidt re discovery and scheduling issues (.5); exchange communications with Chip Paternoster re discovery and scheduling issues (.6); prepare for depositions (3.9)
09/09/22	E. Decker	1.1	Virtual meeting with Lorien Giles to discuss ongoing research (.3); draft supplement responses to Pacific Premier Bank's interrogatories (.8)
09/09/22	L. Giles	0.3	Virtual meeting with Edward Decker re research projects
09/09/22	B. Shattuck	3.0	Research case law in response to Pacific Premier Bank's objections to certain requests for production and interrogatories
09/09/22	J. Vance	5.0	Virtual meeting with Hannah Schmidt and experts (1.0); analyze legal issues for trial (2.0); prepare deposition outline for Greg Usselman deposition (2.0)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
09/12/22	D. Foraker	0.1	Review email from Clyde Hamstreet re conflict waiver for Geffen Mesher's litigation support engagement with Parsons, Farnell and Grein LLP for Riverview Community Bank and related emails
09/12/22	H. Harmon	0.1	Update case docketing for Pacific Premier Bank discovery requests
09/12/22	B. Shattuck	3.8	Research case law in response to Pacific Premier Bank's objections to certain requests for production and interrogatories
09/13/22	E. Decker	3.0	Virtual meeting with Joseph Vance, Eric Mills, Lorien Giles, and Ben Shattuck to discuss discovery projects, research, and deposition preparation (.3); virtual meeting with Lisa Peterson to discuss evidence relating to transfers among pools (.4); prepare supplemental responses to Pacific Premier Bank's interrogatories (2.3)
09/13/22	L. Giles	3.4	Review proposed alternative deposition topics and draft file memorandum re analysis of same (3.1); virtual meeting with Joseph Vance, Edward Decker, Eric Millis, and Ben Shattuck (.3)
09/13/22	E. Mills	0.3	Virtual meeting with Joseph Vance, Edward Decker, Lorien Giles, and Ben Shattuck
09/13/22	L. Peterson	0.8	Review Streamline invoices and email to Joseph Vance re same (.1); prepare ShareFile for RMV documents and email links to Hannah Schmidt and expert (.3); virtual meeting with Edward Decker to discuss evidence relating to transfers among pools (.4)
09/13/22	B. Shattuck	4.3	Research case law in response to Pacific Premier Bank's objections to certain requests for production and interrogatories (1.2); draft file memorandum on relevant case law as applied to facts of case (2.8); virtual meeting with Joseph Vance, Edward Decker, Eric Mills, and Lorien Giles (.3)
09/13/22	J. Vance	6.0	Virtual meeting with Edward Decker, Eric Mills, Lorien Giles, and Ben Shattuck (.3); review discovery responses (.5); prepare for depositions (5.2)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
09/14/22	E. Decker	2.6	Prepare supplemental responses to Pacific Premier Bank's interrogatories
09/14/22	L. Giles	0.5	Review file memorandum re discovery matters
09/14/22	L. Peterson	3.4	Review and analyze loan memorandums re June 2008 personal loan by Pacific Premier Bank to Ross Miles (1.2); respond to email from Edward Decker re same (.2); provide certain loan file documents to Heather Harmon (.2); virtual meeting with Joseph Vance re correspondence from Peter Hawkes (.2); review and analyze correspondence from Peter Hawkes (.1); review and analyze prior email communications with Peter Hawkes and others concerning privileged emails (1.5)
09/14/22	B. Shattuck	0.6	Finalize memorandum on relevant case law re Pacific Premier Bank's objections to certain requests for production and interrogatories
09/14/22	J. Vance	5.2	Review correspondence from Peter Hawkes re privilege documents (.4); virtual meeting with Lisa Peterson re same (.2); email to other parties clawing back privilege documents (.2); prepare for depositions (4.4)
09/15/22	E. Decker	4.2	Prepare supplemental responses to Pacific Premier Bank's interrogatories (4.0); correspond with Hannah Schmidt re responses to Pacific Premier Bank's interrogatories (.2)
09/15/22	L. Peterson	4.4	Compile and send Edward Decker certain credit memo documents (.6); continue to research, review, and analyze emails surrounding privilege issue raised by Peter Hawkes (2.8); virtual meeting with Nick Miller to discuss original privilege tagging in electronic database following ingestion of original data received from Thomas Whatley (1.0)
09/15/22	J. Vance	4.0	Review discovery responses (1.5); exchange communications with other parties re scheduling issues (.5); prepare for depositions (2.0)
09/16/22	E. Decker	2.8	Prepare supplemental responses to Pacific Premier Bank's interrogatories

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
09/16/22	L. Peterson	3.7	Review and respond to email from Edward Decker requesting key loan approval memos (.3); review and analyze documents, and prepare table of key loan approval memos (2.9); review emails from Karri Speck with link to Pacific Premier Bank's production of documents received from Columbia Credit Union, and download documents, organize, and prepare instructions for inclusion in electronic database (.5)
09/19/22	E. Decker	1.8	Virtual meeting with class action counsel re update on common litigation matters (.3); virtual meeting with Joseph Vance to discuss supplemental interrogatory responses (.2); virtual meeting with Lorien Giles to discuss objections to Pacific Premier Bank's 30(b)(6) deposition notices (.3); analyze Riverview Bank's responses to receiver's second set of interrogatories (.2); prepare supplemental responses to Pacific Premier Bank's interrogatories (.8)
09/19/22	L. Giles	5.9	Draft objection to Pacific Premier Bank's 30(b)(6) deposition notices (5.6); virtual meeting with Edward Decker re same (.3)
09/19/22	L. Peterson	2.2	Continue review and analyze emails and key pleadings re Peter Hawkes privilege issue
09/19/22	B. Shattuck	1.4	Legal research
09/19/22	J. Vance	1.5	Revise and edit letter to Pacific Premier Bank re discovery (1.0); prepare for depositions (.5)
09/20/22	E. Decker	1.9	Virtual meeting with Joseph Vance, Lorien Giles, and Ben Shattuck (.3); virtual meeting with Lisa Peterson re document discovery issues (.2); revise draft supplemental responses to Pacific Premier Bank's interrogatories (1.2); telephone call with Hannah Schmidt to discuss supplemental interrogatory responses (.2)
09/20/22	L. Giles	4.9	Virtual meeting with Joseph Vance, Edward Decker, and Ben Shattuck (.3); draft objections to Pacific Premier Bank's 30(b)(6) deposition notices (4.6)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
09/20/22	L. Peterson	5.3	Conference with Joseph Vance re status of research re Peter Hawkes privilege issue (.4); prepare tags in electronic database and email to litigation support team with instructions for privilege tagging of documents on Peter Hawkes' Exhibits A and B (.5); communications with Joseph Spring re locating and tagging privileged documents, and verify accuracy of same (.6); continue to review and analyze emails and documents re Peter Hawkes' privilege issue (2.9); review document tagging (.2); email to Joseph Vance with chronology re Peter Hawkes privilege issue (.1); determine if documents need to be clawed back from FBI (.4); virtual meeting with Edward Decker re document discovery issues (.2)
09/20/22	B. Shattuck	5.5	Research re elements of aiding and abetting breach of fiduciary duty claims (4.3); research case law for objection to Pacific Premier Bank's 30(b)(6) deposition notices (.9); virtual meeting with Joseph Vance, Edward Decker, and Lorien Giles re written discovery and upcoming depositions (.3)
09/20/22	J. Vance	4.7	Prepare for depositions (4.0); conference with Lisa Peterson (.4); virtual meeting with Edward Decker, Lorien Giles, and Ben Shattuck (.3)
09/21/22	E. Decker	2.0	Draft supplemental responses to Pacific Premier Bank's interrogatories (1.0); telephone call with Hannah Schmidt to discuss supplemental responses to Pacific Premier Bank (.2); analyze discovery received from Riverview Bank (.4); revise draft objections to Pacific Premier Bank's 30(b)(6) deposition notices (.4)
09/21/22	D. Foraker	0.5	Review email from Joseph Vance re 30(b)(6) deposition topics directed at receiver (.2); telephone conference with Joseph Vance re 30(b)(6) deposition topics directed at receiver (.3)
09/21/22	L. Giles	3.2	Draft letter responding to Pacific Premier Bank's response to receiver's objections to 30(b)(6) deposition notices
09/21/22	H. Harmon	0.3	Finalize eighth and ninth supplemental responses to Pacific Premier Bank's first interrogatories and prepare for distribution

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
09/21/22	J. Knapp	0.3	Emails with Joseph Vance re declarations in support of petition to appoint receiver and order appointing general receiver
09/21/22	L. Peterson	1.5	Tag documents to claw back from FBI and emails with Joseph Spring re identifying native files in production to FBI (.4); obtain document from Relativity database requested by Heather Harmon (.2); virtual meeting with Joseph Vance re Peter Hawkes privilege issue (.6); continue to review emails re privilege issue (.3)
09/21/22	B. Shattuck	1.6	Legal research
09/21/22	J. Vance	6.6	Prepare for and participate in virtual meeting with expert and Hannah Schmidt (1.5); email to David Foraker re deposition topics directed at receiver (.3); telephone conference with David Foraker re deposition topics directed at receiver (.3); revise and edit objections to deposition topics directed at receiver (1.5); virtual meeting with Lisa Peterson re Peter Hawkes privilege issue (.6); emails with John Knapp (.2); revise and edit supplemental discovery response (1.0); email to Pacific Premier Bank's counsel re Evergreen and Lincoln Data (.4); prepare for depositions (.8)
09/22/22	E. Decker	2.7	Virtual meeting with Joseph Vance to discuss letters to Pacific Premier Bank (.2); virtual meeting with Lorien Giles to discuss letters to Pacific Premier Bank (.3); revise draft letter to Pacific Premier Bank stating objections to 30(b)(6) deposition topics (1.5); revise draft letter to Pacific Premier Bank objecting to depositions of attorney and experts (.4); virtual meeting with Lorien Giles and Ben Shattuck to discuss research projects (.3)
09/22/22	L. Giles	6.3	Virtual meeting with Edward Decker re Pacific Premier Bank letters (.2); virtual meeting with Edward Decker and Ben Shattuck to discuss research projects (.3); legal research and draft file memorandum (5.8)
09/22/22	H. Harmon	0.3	Assist with compiling and organizing potential exhibits for Greg Usselman deposition

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
09/22/22	L. Peterson	0.5	Emails with Heather Harmon re search for emails from Tom Whatley re privilege search terms (.1); search for email re original search terms applied to native data (.4)
09/22/22	B. Shattuck	4.4	Continue legal research and draft file memorandum (4.1); virtual meeting with Edward Decker and Lorien Giles to discuss research projects (.3)
09/22/22	J. Vance	2.7	Revise and edit letter to Pacific Premier Bank re discovery (.8); virtual meeting with Edward Decker re same (.2); prepare for depositions (1.7)
09/23/22	E. Decker	0.9	Prepare for Greg Usselman deposition
09/23/22	L. Giles	5.2	Draft objection to Riverview Bank's 30(b)(6) deposition notices
09/23/22	L. Peterson	4.9	Telephone call with Joseph Vance re status of Peter Hawkes privilege issue (.2); download and organize quarterly contract reports from ShareFile, email to Joseph Vance, and prepare instructions for inclusion of same in electronic database (.5); continue to review and analyze email communications and spreadsheets re privilege issue, and prepare chronology of same (4.0); email to Joseph Vance with updated chronology (.2)
09/23/22	J. Vance	4.9	Attend hearing on motion to set new trial date (.4); prepare for depositions (4.3); telephone call with Lisa Peterson re status of Peter Hawkes privilege issue (.2)
09/26/22	E. Decker	2.2	Telephone conference with Hannah Schmidt to discuss document issues (.4); revise draft objections to Riverview Bank's 30(b)(6) deposition notices (.7); correspond with counsel for Riverview Bank re outstanding discovery (.3); prepare for Greg Usselman deposition (.8)
09/26/22	L. Giles	5.6	Continue drafting objection to Riverview Bank's 30(b)(6) deposition notices
09/26/22	H. Harmon	0.4	Assist with preparation of deposition outline and compilation of exhibits for Greg Usselman deposition

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
09/26/22	L. Peterson	4.5	Analyze key spreadsheets and prepare working spreadsheet for identifying documents to be designated privileged by Peter Hawkes (1.2); prepare for and attend virtual meeting with Joseph Vance re Peter Hawkes privilege issue (.6); determine native files to be clawed back from FBI and emails with Edward Decker re same (.7); prepare additional privilege tags in electronic database (.1); review and analyze documents in the email database against "HAM" documents and tag privilege if located (1.4); prepare instructions to litigation support team for assistance in identifying documents for privilege (.5)
09/26/22	B. Shattuck	2.4	Continue legal research re elements of aiding and abetting breach of fiduciary claims
09/26/22	J. Vance	3.3	Exchange emails with Chip Paternoster re scheduling orders (.3); virtual meeting with Lisa Peterson re Peter Hawkes privilege issue (.5); prepare for depositions (2.5)
09/27/22	E. Decker	2.1	Virtual meeting with Joseph Vance, Eric Mills, Lorien Giles, and Ben Shattuck (.4); virtual meeting with Joseph Vance to prepare for Greg Usselman deposition (.3); virtual meeting with Lisa Peterson to discuss document analysis questions (.3); prepare for Greg Usselman deposition (1.1)
09/27/22	L. Giles	2.4	Revise objection to Riverview Bank's 30(b)(6) deposition notices (2.0); virtual meeting with Joseph Vance, Edward Decker, Eric Mills, and Ben Shattuck (.4)
09/27/22	H. Harmon	1.2	Assist with preparation of exhibits for Greg Usselman deposition
09/27/22	C. McCoy	2.9	Virtual meetings and emails with Lisa Peterson and Joseph Spring (1.3); review spreadsheets and document productions to identify privilege documents identified for clawback in Peter Hawkes' September 14, 2022 letter (1.6)
09/27/22	E. Mills	1.3	Virtual meeting with Joseph Vance, Edward Decker, Lorien Giles, and Ben Shattuck (.4); draft deposition outlines for Riverview Bank witnesses (.9)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
09/27/22	L. Peterson	8.5	Virtual meetings and communications with Joseph Spring and Carol McCoy re specifics of privilege review relating to Peter Hawkes privilege issue (1.3); virtual meeting and email with Edward Decker to discuss document analysis questions (.3); continue to review and analyze HAM documents and email database for privilege as designated by Peter Hawkes (6.9)
09/27/22	B. Shattuck	2.6	Virtual meeting with Joseph Vance, Edward Decker, Eric Mills, and Lorien Giles re document discovery and upcoming depositions (.4); continue legal research (2.2)
09/27/22	J. Vance	5.4	Virtual meeting with Edward Decker, Eric Mills, Lorien Giles, and Ben Shattuck (.4); virtual meeting with Edward Decker to prepare for Greg Usselman deposition (.3); prepare for depositions (4.7)
09/28/22	E. Decker	8.0	Take Greg Usselman deposition
09/28/22	C. McCoy	3.1	Work with Joseph Spring to tag documents on privilege spreadsheet and re-check certain documents
09/28/22	L. Peterson	5.7	Continue to review and analyze documents in email database for privilege as designated by Peter Hawkes (4.9); review email from Joseph Spring with spreadsheet of portion of privileged documents and spot check same for accuracy (.8)
09/28/22	B. Shattuck	5.8	Legal research and draft file memorandum
09/28/22	J. Vance	10.0	Prepare for Greg Usselman deposition (2.0); take Greg Usselman deposition (8.0)
09/29/22	E. Decker	1.0	Virtual meeting with Lisa Peterson re Peter Hawkes privilege issue
09/29/22	C. McCoy	3.0	Virtual meeting with Lisa Peterson and Joseph Spring (1.3); work with Joseph Spring to tag documents on privilege spreadsheet and re-check certain documents (1.7)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
09/29/22	L. Peterson	2.7	Virtual meeting with Carol McCoy re spot checks on document tagging for privilege issue (.3); virtual meeting with Edward Decker re chronology of events re Peter Hawkes privilege issue (1.0); virtual meeting with Joseph Vance re deletion of documents (.1); virtual meeting with Carol McCoy and Joseph Spring to discuss issues re tagging of documents on privilege spreadsheet and plan for re-checking certain documents (1.3)
09/29/22	B. Shattuck	6.1	Legal research and draft file memorandum
09/29/22	J. Vance	0.6	Review information in preparation for response to Peter Hawkes re discovery issue (.5); virtual meeting with Lisa Peterson re deletion of documents (.1)
09/30/22	E. Decker	3.3	Finalize and send letter to Riverview Bank with objections to 30(b)(6) deposition notices (.5); analyze Riverview Bank's supplemental interrogatory responses (1.0); analyze letter from Riverview Bank re the receiver's interrogatory responses (1.2); review research memorandum and provide comments for further research (.6)
09/30/22	C. McCoy	4.1	Confirm privilege document tagging in database (2.7); virtual meeting with Lisa Peterson re deletion of privileged documents from production folders on internal drive (.7); identify and unzip folders in preparation to delete documents listed on Exhibits A and B of Peter Hawkes' September 14, 2022 letter (.7)
09/30/22	L. Peterson	4.5	Review spreadsheet used for identifying documents to tag privileged and determine additional documents to be clawed back (.8); analyze production locations and prepare document to log information re deletion of clawed back documents (1.0); virtual meeting with Carol McCoy re deletion of privileged documents from production zip files (.7); delete all productions from email database from ShareFile and log deletions (1.0); prepare spreadsheet and pdf of additional documents to be clawed back (.7); email to Joseph Vance and Edward Decker re status of Peter Hawkes privilege issue (.3)
09/30/22	B. Shattuck	7.4	Legal research and draft file memorandums

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
09/30/22	J. Vance	0.5	Review and approve response to Chip Paternoster re Riverview Bank discovery issues

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
D. Foraker	Partner	0.6	\$630	\$378.00
J. Knapp	Partner	0.3	595	178.50
J. Vance	Partner	83.5	550	45,925.00
E. Decker	Partner	46.4	475	22,040.00
E. Mills	Associate	2.0	410	820.00
L. Giles	Associate	64.9	380	24,662.00
B. Shattuck	Associate	53.1	350	18,585.00
C. McCoy	Paralegal	13.1	280	3,668.00
L. Peterson	Paralegal	56.6	280	15,848.00
H. Harmon	Paralegal	2.7	225	607.50
Summary Total:		323.2		\$132,712.00

Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Streamline Imaging: Relativity services	2,301.40
Greg Usselman witness fee	47.50
Monte Schwartz witness deposition fee	11.00
Disbursement Total:	\$2,359.90

Invoice Summary

Professional Fees Through September 30, 2022	\$132,712.00
Disbursements	<u>\$2,359.90</u>
Amount Due - Current Period:	<u>\$135,071.90</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: 2195198
October 10, 2022

Invoice Summary

Professional Fees Through September 30, 2022	\$2,439.50
Disbursements	<u>\$0.00</u>
Amount Due – Current Period:	<u>\$2,439.50</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>
09/13/22	J. Knapp	0.5	Emails with Hannah Schmidt re Davis Wright Tremaine settlement agreement signature (.2); emails with John Rake re same (.2); emails with Bridget Donegan re Beattie supplemental agreement (.1)
09/14/22	J. Knapp	0.3	Emails with Bridget Donegan re Beattie supplemental agreement
09/16/22	J. Knapp	0.2	Emails with Tim DeJong and John Rake re class action settlement agreement
09/19/22	J. Knapp	0.1	Emails with John Rake re executed class action settlement agreement
09/22/22	J. Knapp	0.5	Emails with John Rake re class action settlement agreement and re court approval procedures
09/26/22	J. Knapp	0.2	Review and comment on Beattie supplemental agreement
09/27/22	J. Knapp	1.5	Review and comment on Beattie supplemental agreement (1.3); email communications with Bridget Donegan re same (.2)
09/28/22	J. Knapp	0.1	Emails with Bridget Donegan re Beattie supplemental agreement
09/30/22	J. Knapp	0.7	Emails with Bridget Donegan re Beattie supplemental agreement (.3); review and comment on Beattie supplemental agreement (.4)

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
J. Knapp	Partner	4.1	\$595	\$2,439.50
Summary Total:		4.1		\$2,439.50

Account: 721921

Invoice: 2195198

October 10, 2022

Invoice Summary

Professional Fees Through September 30, 2022	\$2,439.50
Disbursements	<u>\$0.00</u>
Amount Due - Current Period:	<u>\$2,439.50</u>

EXHIBIT C



SPECIALIZED
FORENSIC
INVESTIGATIONS

Invoice

Specialized Forensic Investigations LLC

5701 Lonetree Blvd., Suite 212
Rocklin, CA 95765

Invoice Date:	Invoice #:
10/6/2022	1716

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
11/6/2022	Hamstreet & Associates	

Date	Description	Hours	Rate	Amount
9/9/2022	Investigation	0.4	300.00	120.00
9/9/2022	Review of computer records and images			
9/9/2022	Phone call	1.6	300.00	480.00
9/9/2022	Preparation for and call with attorney, Hamstreet and Ueltzen			
9/22/2022	Investigation	0.6	300.00	180.00
9/22/2022	Review of expert reports			
9/22/2022	Phone call	1	300.00	300.00
9/22/2022	Preparation for and call with attorney, 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 Knapp
Miller Nash Graham & Dunn
Pier 70
2801 Alaskan Highway, Suite 300
Seattle, Washington 98121

Re: American Eagle Mortgage - Receivers' Accountant
September 2022 Services

Date	Description	Person	Hours	Rate	Amount
9/9/2022	Accounting Team call	MU	1.2	450.00	\$ 540.00
9/14/2022	Call and preparation for call with counsel regarding damage issues	MU	1.1	450.00	495.00
9/15/2022	Drafting Report Shell	MU	3.4	450.00	<u>1,530.00</u>
	Total Fees				<u>\$ 2,565.00</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	14594
Date	09/30/22
Job Number	AEM-003
PO#	--
Charge#	--

Job Name: Microsite Updates & Maintenance

Agency Contact: Brian Gard

Description: For Professional Services Rendered Through August and September, 2022:

Description	Hours Billed	Amount
Account Services	1.10	\$192.50
Professional Services Subtotal:	1.10	\$192.50
 TOTAL:	 1.10	 \$192.50

PAYMENT TERMS: net 30 days



Invoice Detail Report

Invoice : 14594 Client : Hamstreet & Associates - AEM (AEM)

10/11/22 10:47 AM
(TY)

Reference:	Date:	Vendor/Staff:	Hours:	Billed:	
AEM-003	Microsite Updates & Maintenance				
Account Services:			Rate	Hrs	Amount
385816	08/16/22 NK <i>Document upload</i>	Naureen Khan	\$175.00	0.30	\$52.50
386416	08/23/22 NK <i>Document upload</i>	Naureen Khan	\$175.00	0.30	\$52.50
388999	09/14/22 NK <i>Document upload</i>	Naureen Khan	\$175.00	0.50	\$87.50
				1.10	\$192.50
	AEM-003 TOTAL			1.10	\$192.50
INVOICE #14594 TOTAL:				1.10	\$192.50

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
09/30/2022	22468
Terms	Service Through
	09/30/2022

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

Date	By	Services	Hours	Rates	Amount
09/08/2022	DV/LB	Prepare development payments sheet and Mar de Plata sales sheet	3.00	\$ 50.00/hr	\$ 150.00
09/08/2022	DV/LB	team call	0.25	\$ 50.00/hr	\$ 12.50
09/20/2022	DV/LB	internal communication wit BR and SP re: Tax implications of MDP pre-sale deposits	0.35	\$ 50.00/hr	\$ 17.50
09/20/2022	DV/LB	Follow up MDP commission payment issue	0.35	\$ 50.00/hr	\$ 17.50
09/20/2022	BR	Communications: Sal and Daniela re: Fso Mar de Plata accounting and tax.	0.20	\$ 350.00/hr	\$ 70.00
09/22/2022	DV/LB	weekly development call	0.30	\$ 50.00/hr	\$ 15.00
09/22/2022	DV/LB	Communications re: Certificate of No liens for Lot 11 MDP	0.40	\$ 50.00/hr	\$ 20.00
09/27/2022	DV/LB	solving questions from potential buyer of lot 11	0.50	\$ 50.00/hr	\$ 25.00
09/28/2022	DV/LB	Lot 11 - answering questions of potential buyer	0.50	\$ 50.00/hr	\$ 25.00
09/28/2022	DV/LB	LOT 21 - recirculating PTT for electronic execution	0.30	\$ 50.00/hr	\$ 15.00
09/29/2022	DV/LB	Lot 11 - answering potential buyer questions	0.25	\$ 50.00/hr	\$ 12.50

Total Hours 6.40 hrs
Total Legal fees \$ 380.00
Total Amount \$ 380.00

In Reference To: General (Legal fees)

Date	By	Services	Hours	Rates	Amount
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09/02/2022	BR	Communications: Phone call and Emails FF re: capital accounts and debt in favor of AEM LLCs. Review and analyze numbers and classification to determine best way to repatriate available cash. Email Hannah re: same.	1.75	\$ 350.00/hr	\$ 612.50
09/06/2022	DV/LB	Visit Public Registry: follow up recordation of Tamar Deed	2.00	\$ 100.00/hr	\$ 200.00
09/08/2022	BR	review debt repayment and return of capital numbers w/Sal and Hannah.	0.30	\$ 350.00/hr	\$ 105.00
09/08/2022	DV/LB	Draft Tamar 200 soft closing package	1.00	\$ 100.00/hr	\$ 100.00
09/09/2022	BR	Review debt repayment and return of capital numbers w/Sal, Glo and Hannah.	0.40	\$ 350.00/hr	\$ 140.00
09/12/2022	BR	Communications: Notary Pilar re: Mar de Plata trust deed amendment; email Valerio re: same. Confer with Daniela re: Tamar soft closing.	0.40	\$ 350.00/hr	\$ 140.00
09/13/2022	DV/LB	Tamar 200 Soft Closing: draft agreements and coordinate details	3.00	\$ 100.00/hr	\$ 300.00
09/14/2022	DV/LB	Visit Public Registry: Tamar Deed collected.	3.00	\$ 100.00/hr	\$ 300.00
09/14/2022	DV/LB	Tamar 200 Soft Closing - coordinating details	0.50	\$ 100.00/hr	\$ 50.00
09/14/2022	DV/LB	optimize Tamar deed and forward it to closing attorneys	0.50	\$ 100.00/hr	\$ 50.00
09/14/2022	DV/LB	Villa Montaña Post Closing: filling KYC	1.50	\$ 100.00/hr	\$ 150.00
09/15/2022	IM	follow up on credit line agmnts	0.10	\$ 130.00/hr	\$ 13.00
09/19/2022	BR	Review: and execute Tamar soft closing docs.	0.40	\$ 350.00/hr	\$ 140.00
09/20/2022	DV/LB	Tamar 200 Soft Closing - coordinate execution of documents package, request commission facturas, communications with escrow, coordinate disbursement, prepare tax file for our accountant	3.00	\$ 100.00/hr	\$ 300.00
09/22/2022	DV/LB	Files review, and communications re: Release of Tremayne Mortgage	0.60	\$ 100.00/hr	\$ 60.00
09/29/2022	BR	Communications: Dani, RL team re: transition, pending matters.	0.50	\$ 350.00/hr	\$ 175.00
09/29/2022	DV/LB	follow up on Tamar 100, 200 and 201 hard closings	0.30	\$ 100.00/hr	\$ 30.00
09/30/2022	BR	Local Management & Banking Support (AEMEMMX S DE RL DE CV) Sep, 2022	Flat Fee	\$ 200.00	\$ 200.00

Total Hours 19.25 hrs
Total Legal fees \$ 3,065.50
Total Amount \$ 3,065.50

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

Date	By	Services	Hours	Rates	Amount
09/09/2022	BR	Review: new PSA for lot sale.	0.25	\$ 350.00/hr	\$ 87.50

Total Hours 0.25 hrs

Total Legal fees \$ 87.50
Total Amount \$ 87.50

Total Hours	25.90 hrs
Total Legal fees	\$ 3,533.00
Total Invoice Amount	\$ 3,533.00

Notes:

Thank you in advance for your prompt payment.