

**E-FILED****11-10-2022, 10:51**Honorable Da **Scott G. Weber, Clerk**  
**Clark County**

51 Pages

## SUPERIOR COURT OF WASHINGTON FOR CLARK COUNTY

In re:

Case No. 19-2-01458-06

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

AMERICAN EAGLE MORTGAGE 100, LLC; AMERICAN EAGLE MORTGAGE 200, LLC; AMERICAN EAGLE MORTGAGE 300, LLC; AMERICAN EAGLE MORTGAGE 400, LLC; AMERICAN EAGLE MORTGAGE 500, LLC; AMERICAN EAGLE MORTGAGE 600, LLC; AMERICAN EAGLE MORTGAGE MEXICO 100, LLC; AMERICAN EAGLE 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.

TO: AMERICAN EAGLE MORTGAGE 100 LLC; AMERICAN EAGLE MORTGAGE 200, LLC; AMERICAN EAGLE MORTGAGE 300, LLC; AMERICAN EAGLE MORTGAGE 400, LLC; AMERICAN EAGLE MORTGAGE 500, LLC; AMERICAN EAGLE MORTGAGE 600, LLC; AMERICAN EAGLE MORTGAGE MEXICO 100, LLC; AMERICAN EAGLE 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  
(OCTOBER 2022) - 1

4881-5865-6317.1

**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 (October 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 October 2022. For this period, the Receiver requests  
15 final approval of its compensation in the amount of \$65,802.50 and reimbursement of costs of  
16 \$6,554.20, for a total payment of \$72,356.70.

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 October 2022.  
19 For this period, such attorneys request final approval of their compensation in the amount of  
20 \$133,261.00 and reimbursement of costs of \$1,385.00, for a total payment of \$134,646.00.

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 October 2022. For this period, such forensic accountants request final  
24 approval of their compensation in the amount of \$450.00 and reimbursement of no costs, for a  
25 total payment of \$450.00.

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 October 2022. For this period, such forensic accountant requests final approval of his  
4 compensation in the amount of \$2,520.00 and reimbursement of no costs, for a total payment of  
5 \$2,520.00.

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 October 2022. For this period, such consultants request final approval of  
9 their compensation in the amount of \$165.00 and reimbursement of no costs, for a total payment  
10 of \$165.00.

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 October 2022. For this period, such attorneys request final approval of their compensation in  
14 the amount of \$8,161.50 and reimbursement of no costs, for a total payment of \$8,161.50.

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 November 23, 2022, the Receiver may make the  
17 payments requested herein and/or the professionals may apply their retainers, if any.

18 DATED this 10<sup>th</sup> day of November, 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  
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# EXHIBIT A



**HAMSTREET**  
*& associates*

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

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Invoice submitted to:

American Eagle Mortgage Investment Funds Receiverships  
4225 NE St James Road  
Vancouver, WA 98663

November 7, 2022

Invoice # 2576

Professional Services

			<u>Hours</u>	<u>Amount</u>
10/3/2022	HS	Litigation Support Calls with Class action team and Damian Platosh. Research and respond to question from class regarding investor balances.	0.50	250.00
	HS	Receivership Duties Call with Daniela Velazquez, Evelyn Torres and Veronica Hamstreet regarding Todos Santos and Mar de Plata.	0.40	200.00
10/4/2022	CAH	Receivership Duties Review email from SEC; update from Hannah Schmidt on depositions, and Joe Vance comments on case. Discuss Mexico properties and need for visit. Approve wires.	1.20	720.00
	HS	Litigation Support Call with John Knapp, Joe Vance, and Robert Contract regarding SEC action.	0.20	100.00
	HS	Receivership Duties Prepare for quarterly reporting. Other case administration. Discuss with Clyde Hamstreet.	1.00	500.00
10/5/2022	CAH	Receivership Duties Review and sign DWT partial settlement and forward to counsel. Work on scheduling trip to Mexico.	0.50	300.00
	HS	Receivership Duties Read and respond to emails.	0.50	250.00
	HS	Litigation Support Calls with Joe Vance. Meet with Damian Platosh.	0.70	350.00
10/6/2022	CAH	Receivership Duties Work with Hannah Schmidt on projected cash flow through 2023 to evaluate level of distribution. Work on assessment of litigation cost and prepare a memo regarding same.	5.30	3,180.00

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			<u>Hours</u>	<u>Amount</u>
10/6/2022	HS	Pacific Premier Bank Run sample reports from EDs for PPB. Email to Joe Vance regarding same.	1.00	500.00
	HS	Litigation Support Work with Clyde Hamstreet to review cash flow budget. Calls with Joe Vance and David Foraker. Follow up work regarding same.	3.00	1,500.00
	HS	Litigation Support Prepare for and call with Mike Ueltzen and Paul Artley.	0.80	400.00
	HS	Receivership Duties Calls with Jim Hart, Daniela Velazquez, and Libi Morales regarding Mar de Plata.	0.50	250.00
10/7/2022	HS	Litigation Support Work on compiling information for damages calculation.	1.00	500.00
10/8/2022	HS	Pacific Premier Bank Run EDs reports for discovery.	1.40	700.00
	HS	Litigation Support Work on underlying data for damages calculation.	2.50	1,250.00
10/10/2022	HS	Receivership Duties Read and respond to emails.	0.30	150.00
10/11/2022	HS	Receivership Duties Work on data for damage calculation.	2.00	1,000.00
10/12/2022	MA	Receivership Duties Call with Walt Snyder on property cleanup status. Authorize payment.	0.10	32.50
	HS	Litigation Support Call with Mike Ueltzen regarding damages.	0.50	250.00
10/13/2022	CAH	Receivership Duties Talk with Hannah Schmidt regarding Mexico timing and sales progress.	0.30	180.00
	MA	Receivership Duties Call with Evergreen disposal to schedule dumpster pickup.	0.10	32.50
	HS	Litigation Support Call with Martha Cohn regarding data for damage expert.	0.80	400.00
	HS	Receivership Duties Call with Maris Consultoria Integral regarding Mar de Plata environmental work.	0.40	200.00
	HS	Receivership Duties Talk with Clyde Hamstreet regarding timing and sales progress in Mexico.	0.30	150.00

			<u>Hours</u>	<u>Amount</u>
10/14/2022	MC	Litigation Support Call with Hannah Schmidt on priorities and tasks. Start work on contract history spreadsheet.	3.70	555.00
	HS	Receivership Duties Begin work on quarterly reporting.	0.60	300.00
	HS	Receivership Duties Plan agenda for trip to Mexico.	0.30	150.00
	HS	Litigation Support Prepare for October 20 meeting.	3.20	1,600.00
10/15/2022	MC	Litigation Support Work on contract history spreadsheet.	0.80	120.00
	HS	Receivership Duties Review draft Goble creek settlement and draft email to Ken McQuhae regarding same.	0.30	150.00
	HS	Receivership Duties Continue work on quarterly reporting.	2.30	1,150.00
10/16/2022	MC	Litigation Support Work on contract history spreadsheet.	2.00	300.00
	HS	Litigation Support Review contract summary from Martha Cohn. Add Mexican properties to it and the REO summary.	0.60	300.00
10/17/2022	MA	Receivership Duties Call with Evergreen disposal to schedule dumpster pickup.	0.10	32.50
10/18/2022	CAH	Receivership Duties Work with Hannah Schmidt on scheduling and preparations for meeting with counsel on litigation.	0.60	360.00
	MC	Litigation Support Work on damage calculation.	1.10	165.00
	HS	Litigation Support Collect data for damages calculation.	0.80	400.00
	HS	Litigation Support Calls and emails regarding production.	1.00	500.00
	HS	Receivership Duties Prepare for trip to Cabo.	2.00	1,000.00
	HS	Receivership Duties Review motion and order for 2nd distribution, update schedule for my declaration, and email to the Class regarding their distributions.	2.00	1,000.00

			<u>Hours</u>	<u>Amount</u>
10/19/2022	MC	Litigation Support Work on damage calculation.	2.70	405.00
	CAH	Advisory Services Work on schedule for Mexico trip; work on preparations for meeting with counsel. Conference call with investors regarding information on distributions.	0.60	360.00
	HS	Receivership Duties Run Bauman payoff for foreclosure. Emails regarding same.	0.30	150.00
	HS	Litigation Support Prepare for litigation meeting on 10/20. Call to Lincoln Data.	0.50	250.00
10/20/2022	CAH	Receivership Duties Meet with Joe Vance, David Foraker, Michael Ueltzen and Hannah Schmidt regarding case update and estimated distribution for third quarter.	1.90	1,140.00
	MA	Receivership Duties Coordinate dumpster emptying with Walter Snyder and Evergreen disposal. Coordinate final cleanup details with Walt Snyder; ordered final dumpster from Evergreen.	0.10	32.50
	MC	Litigation Support Work on damage calculation.	2.00	300.00
	HS	Litigation Support Call with Cliff Hackney regarding Lincoln Data.	0.20	100.00
	HS	Litigation Support Emails with Lisa Peterson. Call with Joe Vance.	0.20	100.00
	HS	Litigation Support Discussion with Clyde Hamstreet, Joe Vance, Dave Foraker and Mike Ultzen. Follow up call with Mike Ultzen.	2.80	1,400.00
10/21/2022	CAH	Receivership Duties Conference call with David Foraker regarding legal aspects of litigation strategy. Follow up with Hannah Schmidt.	0.90	540.00
	HS	Litigation Support Discussion with Clyde Hamstreet and follow up call to Dave Foraker.	1.00	500.00
10/22/2022	MC	Litigation Support Work on damage calculation.	6.40	960.00
	HS	Receivership Duties Continue work on quarterly reporting.	2.50	1,250.00
10/23/2022	CAH	Receivership Duties Travel to San Jose del Cabo to review progress on real estate sales.	4.00	2,400.00



			<u>Hours</u>	<u>Amount</u>
10/23/2022	MC	Litigation Support Work on damage calculation.	3.30	495.00
	HS	Receivership Duties Continue work on and finalize quarterly reporting.	2.50	1,250.00
	HS	Travel Time Travel time from Portland to Cabo.	4.00	2,000.00
10/24/2022	CAH	Receivership Duties Visit realtors in Todos Santos and walk property considering development options with Valerio Gonzalez, Joanne Berkowitz, Hannah Schmidt and Veronica Hamstreet. Drive to La Paz	8.00	4,800.00
	MC	Litigation Support Work on damage calculation.	1.90	285.00
	HS	Receivership Duties Site visit to Todos Santos, meet with Valerio Gonzales and Joanne Berkowitz regarding same. Discussions with Clyde Hamstreet and Veronica Hamstreet regarding property and options.	8.00	4,000.00
10/25/2022	CAH	Receivership Duties Site visit to La Paz property to walk and estimate approximate marketability and value. Talk with Kitsya Bourlon as a potential realtor for property regarding markets for similar properties. Discuss problem of overlaying titles and need for survey. Drive to Mar de Plata and meet with Jim Hart to walk marked out lots and review sales activity.	8.00	4,800.00
	HS	Receivership Duties Site visits to La Paz property, meet with potential realtor. Site visit to Mar de Plata and meeting with Jim Hart. Dinner meeting with Ben Rosen.	8.00	4,000.00
10/26/2022	CAH	Travel Time Travel time from Cabo to Portland.	4.00	2,400.00
	CAH	Receivership Duties Meet with Ben Rosen and two potential CPA's with expertise in Mexican tax law and audit qualifications. Review Salvador Espinosa request for increase in accounting service fees.	4.00	2,400.00
	HS	Travel Time Travel time from Cabo to Portland.	4.00	2,000.00
	HS	Receivership Duties Meet with Ben Rosen, Salvador Espinosa, and two potential tax advisors.	4.00	2,000.00
10/27/2022	HS	Receivership Duties Work on 2nd distribution.	1.00	500.00
10/28/2022	MA	Receivership Duties Email status update to Hannah Schmidt.	0.20	65.00

		<u>Hours</u>	<u>Amount</u>
10/31/2022	FM Administrative Services July-September reporting and reconciliations.	8.00	1,200.00
	MA Receivership Duties Communications with Walter Snyder regarding final invoice.	0.10	32.50
	MC Receivership Duties Review distribution motion and draft summary for website. Respond to investor email correspondence. Draft website blurb for motion. Discuss investor questions with Hannah Schmidt. Enter and print checks.	4.40	660.00
	HS Investor Relations Discussions with Martha Cohn regarding investor questions.	0.50	250.00
	HS Receivership Duties Review offers on Montana property. Calls with Shawna Norry regarding same. Emails with Matt Alford regarding property clean up.	0.70	350.00
	HS Litigation Support Call with class action team. Call with Mike Ueltzen and Paul Artley. Follow up regarding same.	2.00	1,000.00
<b>For professional services rendered</b>		<b>149.40</b>	<b>\$65,802.50</b>

## Additional Charges :

		<u>Price</u>	<u>Qty</u>	
10/23/2022	Airfare for Hannah Schmidt for trip to Cabo.	\$1,189.38	1	1,189.38
	Airfare for Clyde Hamstreet for trip to Cabo.	\$1,094.38	1	1,094.38
	Airfare for Veronica Hamstreet for trip to Cabo.	\$1,094.38	1	1,094.38
	Dinner for Clyde Hamstreet, Hannah Schmidt and Veronica Hamstreet for trip to Cabo.	\$92.28	1	92.28
10/24/2022	Lodging expense for Hannah Schmidt for trip to Cabo.	\$176.46	1	176.46
	Lodging expense for Clyde Hamstreet for trip to Cabo.	\$176.46	1	176.46
	Dinner for Clyde Hamstreet, Hannah Schmidt and Veronica Hamstreet for trip to La Paz.	\$202.64	1	202.64
	Lunch for Clyde Hamstreet, Hannah Schmidt, Valerio Gonzalez and Veronica Hamstreet for trip to Todos Santos.	\$165.36	1	165.36
10/25/2022	Coffee break for Clyde Hamstreet, Hannah Schmidt and Veronica Hamstreet for trip to La Paz.	\$23.18	1	23.18
	Lodging expense for Hannah Schmidt for trip to La Paz.	\$137.69	1	137.69

	<u>Price</u>	<u>Qty</u>	<u>Amount</u>
10/25/2022 Coffee break for Clyde Hamstreet, Hannah Schmidt and Veronica Hamstreet for trip to Cabo.	\$33.19	1	33.19
Lodging expense for Clyde Hamstreet for trip to La Paz.	\$137.69	1	137.69
10/26/2022 Parking expense for Clyde Hamstreet for trip to Cabo.	\$108.00	1	108.00
Hotel expense for Clyde Hamstreet for trip to Cabo.	\$364.65	1	364.65
Hotel expense for Hannah Schmidt for trip to Cabo.	\$364.65	1	364.65
Fuel for rental car for Clyde Hamstreet for trip to Cabo.	\$99.21	1	99.21
Starbuck beverages for Clyde Hamstreet, Hannah Schmidt and Veronica Hamstreet for trip to Cabo.	\$10.38	1	10.38
Lunch for Hannah Schmidt and Veronica Hamstreet for trip to Cabo.	\$35.28	1	35.28
Breakfast for Clyde Hamstreet, Hannah Schmidt and Veronica Hamstreet for trip to Cabo.	\$144.38	1	144.38
Car rental for trip to Cabo.	\$894.38	1	894.38
Toll fee expense for Clyde Hamstreet for trip to Cabo.	\$10.18	1	10.18
<b>Total additional charges</b>			<b>\$6,554.20</b>
<b>Total amount of this bill</b>			<b>\$72,356.70</b>
Accounts receivable transactions			
11/2/2022 Payment invoice #2572 - Thank You. Check No. 1646			(\$32,579.50)
<b>Total payments and adjustments</b>			<b>(\$32,579.50)</b>
Balance due			<b>\$72,356.70</b>

Consultant Summary			
Name	Hours	Rate	Amount
Clyde A. Hamstreet - Principal	39.30	600.00	\$23,580.00
Hannah Schmidt - Consultant	73.10	500.00	\$36,550.00
Martha Cohn - Jr. Consultant	28.30	150.00	\$4,245.00
Matthew Alford - Consultant	0.70	325.00	\$227.50
Felicia Muli	8.00	150.00	\$1,200.00

# EXHIBIT B

Client.Matter	Description	Bill Amt	Fees	Costs	Bill Num
721921.0001	American Eagle Mortgage Investment Funds	\$18,045.50	\$17,985.50	\$60.00	2197114
721921.0017	Adjunct Litigation Claims Against Ross Miles, Maureen Wile, et al.	\$114,458.50	\$113,133.50	\$1,325.00	2197113
721921.0019	Investigation of Adjunct Litigation Claims Against AEI/AEMM Lenders	\$2,142.00	\$2,142.00	\$0.00	2197115
		\$134,646.00	\$133,261.00	\$1,385.00	



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: 2197114  
November 4, 2022

**Invoice Summary**

Professional Fees Through October 31, 2022	\$17,985.50
Disbursements	\$60.00
<b>Amount Due – Current Period:</b>	<b><u>\$18,045.50</u></b>

**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**

<b><u>Date</u></b>	<b><u>Professional</u></b>	<b><u>Time</u></b>	<b><u>Description of Services</u></b>
10/03/22	E. Decker	0.3	Virtual meeting re updates on AEM receiver/AEM investor litigation matters
10/03/22	D. Foraker	0.5	Virtual meeting with Chris Kayser, John Rake, Jon Hunt, Hannah Schmidt, and Ed Decker re update on AEM receiver/AEM investor litigation matters (.3); emails and virtual meeting with John Knapp re interim investor distribution matters (.2)
10/03/22	J. Knapp	0.6	Draft notice of intent to compensate (September 2022) (.2); continue drafting motion to reduce investor claim amounts and approve second interim distribution (.2); emails and virtual meeting with David Foraker re interim investor distribution matters (.2)
10/04/22	J. Knapp	0.8	Emails with Rob Durham re SEC v. AEI scheduling order (.2); telephone conference call with Rob Durham, Joe Vance, and Hannah Schmidt re SEC matters (.3); continue drafting notice of intent to compensate (September 2020) (.3)
10/04/22	J. Vance	0.3	Telephone conference with Rob Durham, John Knapp, and Hannah Schmidt
10/06/22	D. Foraker	0.1	Emails with Hannah Schmidt re receiver's thirteenth quarterly report
10/06/22	J. Knapp	0.4	Email communications with Paul Artley re notice of intent to compensate (September 2022) (.2); continue drafting notice of intent to compensate (September 2022) (.2)
10/07/22	J. Knapp	0.6	Email communications with Veronica Hamstreet re notice of intent to compensate (September 2022) (.2); continue drafting notice of intent to compensate (September 2022) (.2); email communications with professionals re request for invoices for notice of intent to compensate (September 2022) (.2)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/08/22	J. Knapp	0.4	Email communications with Michael Ueltzen re notice of intent to compensate (September 2022) (.2); continue drafting notice of intent to compensate (September 2022) (.2)
10/10/22	J. Knapp	2.4	Email communications with Rosen Law Billing Department re notice of intent to compensate (September 2022) (.2); continue drafting notice of intent to compensate (September 2022) (.3); draft notice of settlement (Davis Wright Tremaine, Class Action Plaintiffs, and Beattie Plaintiffs) (1.7); email communications with Hannah Schmidt re notice of settlement (.2)
10/11/22	J. Knapp	0.8	Email communications with Hannah Schmidt re notice of intent to compensate (September 2022) (.2); email communications with Teri Yamauchi re notice of intent to compensate (September 2022) (.2); continue drafting notice of intent to compensate (.4)
10/12/22	J. Knapp	0.5	Finalize notice of intent to compensate (September 2022) (.3); email communications with Naureen Khan re transmittal of notice of intent to compensate (September 2022) for uploading to website (.2)
10/13/22	J. Knapp	2.4	Continue drafting motion to reduce investor claim amounts and approve second interim distribution (1.6); draft proposed order (.8)
10/14/22	D. Foraker	4.3	Revise first drafts of motion and proposed order to reduce allowed amounts of certain investor claims to account for Davis Wright Tremaine LLP recoveries and for authorization to make additional interim distributions
10/15/22	D. Foraker	0.6	Edit second drafts of motion and order
10/17/22	J. Knapp	1.2	Continue drafting motion and proposed order (.9); emails with David Foraker and Hannah Schmidt re motion and proposed order (.3)



<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/18/22	D. Foraker	1.4	Review email from Hannah Schmidt re second interim distribution motion with draft schedule of allowed claims (.2); revise drafts of motion and proposed order (.8); email with Hannah Schmidt re transmittal of revised drafts of motion and proposed order and related emails (.3); review email from Hannah Schmidt to AEM investors' Oregon class counsel and Beattie plaintiffs' counsel re second interim distribution with request for estimate of DWT distributions (.1)
10/18/22	J. Knapp	0.2	Voicemails and emails with Hannah Schmidt re motion to approve second interim distribution
10/19/22	J. Knapp	0.2	Voicemail from Joanie Spradlin re claim distributions (.1); email with Hannah Schmidt re same (.1)
10/19/22	J. Palomares	0.4	Emails and telephone call with Hannah Schmidt re payoff requests for Nehalem and Bauman Trust properties (.2); emails with trustees for Nehalem and Bauman Trust properties re timeline for sales (.2)
10/20/22	J. Palomares	0.2	Emails with Hannah Schmidt re payoff quote for Bauman Trust property and emails with foreclosure trustee re same
10/24/22	D. Foraker	0.6	Review email from Hannah Schmidt with draft of receiver's report for quarterly period ending 9/30/2022 and related emails
10/24/22	J. Knapp	0.7	Review and comment on draft of receiver's quarterly report (.4); emails with Hannah Schmidt re same (.3)
10/25/22	D. Foraker	1.3	Review email from Hannah Schmidt with final version of receiver's thirteenth quarterly report (.1); review emails from Hannah Schmidt and John Rake re second interim distribution matters and related emails (.2); telephone conference with John Stephens (attorney for Oregon investor class) re concerns and issues relating to proposed second interim distribution (.2); analyze impact of possible disapproval of DWT class action settlement on proposed second interim distribution (.2); email with Hannah Schmidt (.4); virtual meeting with John Knapp re second interim distribution matters (.2)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/25/22	J. Knapp	1.6	Emails with Hannah Schmidt re receiver's quarterly report (.2); draft notice of filing of quarterly report (.3); emails with Hannah Schmidt and John Rake re estimated recoveries to class plaintiffs (.3); emails with Hannah Schmidt re McQuhae settlement (.2); continue drafting McQuhae settlement agreement (.4); virtual meeting with David Foraker (.2)
10/26/22	D. Foraker	0.2	Emails with Hannah Schmidt and John Knapp re second interim distribution matters
10/26/22	J. Knapp	0.7	Review mailing lists and request from investor to be removed (.2); emails with Hannah Schmidt re no objections to notice of intent to compensate (August and September 2022) (.1); emails with Hannah Schmidt re motion to approve second interim distribution (.4)
10/26/22	J. Palomares	0.1	Emails with foreclosure trustee Joyce Copeland re directions for delivering Bauman Trust loan payoff proceeds
10/27/22	D. Foraker	0.2	Review revised drafts of motion to authorize second interim distribution and supporting declaration and proposed order and related emails
10/27/22	J. Knapp	1.2	Draft citation for hearing on motion to approve second interim distribution (.2); revise drafts of motion to authorize second interim distribution and proposed order (.7); review and comment on mailing lists (.3)
10/27/22	J. Knapp	2.8	Emails with Hannah Schmidt re motion to approve second interim distribution (.6); review schedule of adjusted claims and positive MIMO mailing list (.6); continue drafting motion to approve second interim distribution (.7); continue drafting notice of filing of receiver's quarterly report (.2); draft declaration of Hannah Schmidt re motion to approve second interim distribution (.7)
10/27/22	J. Knapp	0.2	Review Lincoln County, Montana, tax statement (.1); emails with Hannah Schmidt re same (.1)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/28/22	D. Foraker	0.1	Email to Chris Kayser, John Stephens, et al re transmittal of filed copies of receiver's second interim distribution motion and related documents
10/28/22	J. Knapp	1.0	Finalize notice of filing of receiver's quarterly report (.2); emails with Naureen Khan re transmittal of notice of filing of receiver's quarterly report for posting to website (.2); finalize motion to authorize second interim distribution and related documents (.4); emails with Naureen Khan re transmittal of motion and related documents for posting to website (.2)
10/31/22	B. Dickey	0.4	Review email from John Knapp with notice re Washington annual report of 10808 Lighthouse, LLC (.2); prepare and file Washington annual report of 10808 Lighthouse, LLC (.2)
10/31/22	J. Knapp	0.4	Email communications with Brenna Dickey and Hannah Schmidt re Washington annual reports

**Fee Summary**

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
D. Foraker	Partner	9.3	\$630	\$5,859.00
J. Knapp	Partner	19.1	595	11,364.50
J. Vance	Partner	0.3	550	165.00
E. Decker	Partner	0.3	475	142.50
J. Palomares	Partner	0.7	475	332.50
B. Dickey	Paralegal	0.4	305	122.00
<b>Summary Total:</b>		<b>30.1</b>		<b>\$17,985.50</b>

**Disbursement Summary**

<u>Disbursements</u>	<u>Amount</u>
Washington Secretary of State	60.00
<b>Disbursement Total:</b>	<b>\$60.00</b>

Account: 721921

Invoice: 2197114

November 4, 2022

Invoice Summary

Professional Fees Through October 31, 2022	\$17,985.50
Disbursements	<u>\$60.00</u>
<b>Amount Due - Current Period:</b>	<b><u>\$18,045.50</u></b>



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: 2197113  
November 4, 2022

**Invoice Summary**

Professional Fees Through October 31, 2022	\$113,133.50
Disbursements	<u>\$1,325.00</u>
<b>Amount Due – Current Period:</b>	<b><u>\$114,458.50</u></b>

**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**

<b><u>Date</u></b>	<b><u>Professional</u></b>	<b><u>Time</u></b>	<b><u>Description of Services</u></b>
10/01/22	C. McCoy	2.1	Identify and make deletions to each clawed back document listed in Exhibits A and B of Peter Hawkes' September 14, 2022, letter from the Images, Native, and Ocr folders placed in ShareFile for production
10/02/22	C. McCoy	3.3	Continue to identify and make deletions to each clawed back document listed in Exhibits A and B of Peter Hawkes' September 14, 2022, letter from the Images, Native, and Ocr folders placed in ShareFile for production
10/03/22	E. Decker	2.4	Virtual meeting with David Foraker re discovery matters (.3); analyze letter from Riverview Bank re receiver's responses to interrogatories (.8); analyze research re proper scope of 30(b)(6) depositions (.7); virtual meeting with Lisa Peterson to discuss privilege issues (.2); analyze selected documents for privilege (.4)
10/03/22	D. Foraker	0.3	Virtual meeting with Edward Decker re discovery matters
10/03/22	C. McCoy	3.9	Identify and make deletions to each clawed back document listed in Exhibits A and B of Peter Hawkes' September 14, 2022, letter from the production folders containing images and OCR files on the back end of the database (3.0); virtual meetings with Lisa Peterson re same (.9)
10/03/22	L. Peterson	2.3	Delete clawback documents from FBI production (.4); communications with Joseph Spring re new CDs for FBI (.4); virtual meeting with Edward Decker to discuss privilege issues (.2); virtual meetings with Carol McCoy re to resolve issues of privilege from documents (.9); telephone call from Joe Vance re status of deletion of privileged documents (.1); update document log for deletion of privileged documents (.3)
10/03/22	B. Shattuck	2.8	Legal research

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/04/22	E. Decker	1.9	Virtual meeting with Joe Vance, Lorien Giles, Eric Mills, and Ben Shattuck to discuss ongoing discovery issues and research projects (.4); virtual meeting re conferral with counsel for Pacific Premier Bank and Riverview Bank re case scheduling and discovery issues (.8); virtual meeting with Joe Vance to discuss follow-up projects following conferral with opposing counsel (.2); analyze discovery responses from Riverview Bank (.5)
10/04/22	H. Harmon	0.2	Obtain conformed copy of order amending case schedule and update case docketing
10/04/22	C. McCoy	4.9	Identify and make deletions to each clawed back document listed in Exhibits A and B of Peter Hawkes' September 14, 2022, letter from the database images on the back end of the database (3.6); email and virtual meeting with Lisa Peterson re same (.5); conduct comparison of database tagging with Exhibits A and B of Peter Hawkes' September 14, 2022, letter (.8)
10/04/22	E. Mills	1.2	Virtual meeting with Joe Vance, Lorien Giles, Eric Mills, and Ben Shattuck to discuss ongoing discovery issues and research projects (.4); review and analyze discovery responses and expert analysis to draft deposition outlines for Riverview Bank deponents (.8)
10/04/22	L. Peterson	1.5	Electronic database work to plan for deletion of native files, images, and extracted text from back end of the database (.4); email and virtual meeting with Carol McCoy re steps for deletion of additional clawback documents (.5); virtual meeting with Joseph Spring re utility for deletion of images and extracted text (.3); email to Joe Vance with list of additional clawback documents (.1); email to Bridget Donegan and Christine Ortez requesting clawback of additional documents (.1); update clawback log (.1)
10/04/22	B. Shattuck	1.2	Virtual meeting with Joe Vance, Edward Decker, Eric Mills, and Lorien Giles to discuss ongoing discovery issues and research projects (.4); legal research (.8)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/04/22	J. Vance	4.0	Virtual meeting with Edward Decker, Lorian Giles, Eric Mills, and Ben Shattuck (.4); prepare for conferral meeting with Riverview Bank and Pacific Premier Bank (.8); virtual meeting re conferral with counsel for Riverview Bank and Pacific Premier Bank (.8); virtual meeting with Edward Decker (.2); prepare for depositions (1.8)
10/05/22	E. Decker	2.2	Analyze interrogatory responses received from Riverview Bank (1.0); prepare responses to Riverview Bank's follow-up letter re interrogatories (.6); review case law on unclean hands defense asserted by bank defendants (.6)
10/05/22	L. Giles	1.2	Legal research
10/05/22	C. McCoy	2.1	Identify and make deletions to documents identified by Miller Nash subsequent to Peter Hawkes' September 14, 2022, letter from production folders and database images in database
10/05/22	L. Peterson	0.4	Virtual meetings with Carol McCoy and Joseph Spring re deletion of clawback documents from electronic database (.3); email to Heather Harmon documents provided to expert from email database (.1)
10/05/22	J. Vance	2.5	Outline arguments for protective order (.5); analyze issues for trial (2.0)
10/06/22	E. Decker	1.9	Virtual meeting with Joe Vance to discuss responses to Riverview Bank's discovery requests (.7); virtual meeting with David Foraker and Joe Vance (.3); draft response to Riverview Bank letter re the receiver's discovery responses (.9)
10/06/22	D. Foraker	0.7	Telephone conference with Clyde Hamstreet and Hannah Schmidt re organization of litigation team meeting and related emails (.3); virtual meeting with Joe Vance and Edward Decker re case strategy (.3); email with Clyde Hamstreet and Hannah Schmidt re Peter Hawkes' letter (.1)
10/06/22	L. Giles	4.2	Legal research



<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/06/22	C. McCoy	0.7	Review expert inventory for documents listed in Peter Hawkes' September 14, 2022, letter
10/06/22	B. Shattuck	0.6	Prepare research memorandum re proper scope of 30(b)(6) depositions
10/06/22	J. Vance	3.0	Virtual meeting with Edward Decker (.7); virtual meeting with David Foraker and Edward Decker (.3); analyze discovery issues (1.5); research legal issues (.5)
10/07/22	E. Decker	0.8	Draft responses to Riverview Bank's questions re receiver's discovery responses (.5); virtual meeting with Lisa Peterson to discuss document and database management issues (.3)
10/07/22	C. McCoy	5.6	Delete native images from privilege tags in database in order to comply with Peter Hawkes' September 14, 2022, letter (3.8); review case pleadings and instructions re coding protocol and assignment (1.8)
10/07/22	L. Peterson	0.9	Communications with Carol McCoy re clawback issue and re coding of Pacific Premier Bank files in electronic database (.5); virtual meeting with Edward Decker to discuss document and database management issues (.3); email to Joe Vance to provide update on clawback issue (.1)
10/07/22	B. Shattuck	3.5	Legal research
10/07/22	J. Vance	2.7	Review letter from Pacific Premier Bank re discovery issues (.5); exchange communications with Annie Banks re Evergreen Data (.8); exchange communications with Hannah Schmidt re Evergreen Data (.5); review Evergreen Data (.9)
10/09/22	C. McCoy	1.5	Input objective coding within receiver's eighth production
10/10/22	E. Decker	1.7	Draft response letter to Riverview Bank's questions re receiver's discovery responses
10/10/22	C. McCoy	2.0	Input objective coding within receiver's eighth production (1.4); virtual meeting with Lisa Peterson (.6)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/10/22	L. Peterson	3.4	Download, organize, and review Evergreen Data reports (.2); email to Joe Vance re same (.1); virtual meeting with Carol McCoy to explain databases and discuss coding documents (.6); prepare instructions for production runs 11 and 12 (.5); remove Nick Miller from ShareFile and add Carol McCoy (.1); finalize production of Evergreen Data reports and email same to Joe Vance (.3); search databases re Riverview Bank (1.6)
10/10/22	B. Shattuck	4.5	Draft research memorandum
10/10/22	J. Vance	0.7	Review documents to be produced (.5); emails with Hannah Schmidt re scheduling issues (.2)
10/11/22	E. Decker	3.5	Virtual meeting with Joe Vance, Eric Mills, Lorian Giles, and Ben Shattuck re discovery issues, research, and deposition preparation (.4); analyze research on permissible scope of interrogatories (.5); telephone conference with Hannah Schmidt to discuss responses to Riverview Bank's interrogatories (.3); draft response to Riverview Bank's letter re receiver's responses to interrogatories (2.3)
10/11/22	L. Giles	3.4	Virtual meeting with Joe Vance, Edward Decker, Eric Mills, and Ben Shattuck re discovery issues, research, and deposition preparation (.4); legal research (3.0)
10/11/22	L. Peterson	0.6	Email to Joseph Spring re deletion of additional images and extracted text associated with clawbacks in electronic database (.1); review and analyze documents re Riverview Bank (.5)
10/11/22	B. Shattuck	4.7	Continue drafting research memorandum (1.8); virtual meeting with Joe Vance, Edward Decker, Eric Mills, and Lorian Giles re discovery issues, research, and deposition preparation (.4); legal research (2.5)
10/11/22	J. Vance	0.6	Email to Annie Banks re scheduling issue (.2); virtual meeting with Edward Decker, Eric Mills, Lorian Giles, and Ben Shattuck (.4)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/12/22	E. Decker	2.5	Virtual meetings with Lisa Peterson to discuss analysis of previously produced documents (.4); virtual meeting with Joe Vance to discuss response to letter from Pacific Premier Bank (.5); email with Hannah Schmidt re additional searches of receiver's emails (.3); draft response to Riverview Bank's letter re receiver's discovery responses (1.3)
10/12/22	L. Peterson	5.7	Review correspondence from Shannon Armstrong and respond to Joe Vance with list of documents responsive to paragraph 1.A. (.4); review email from Heather Harmon re expert discovery deadlines (.1); update document indexes (.5); virtual meetings with Edward Decker (.4); emails with Joseph Spring to run database utilities (.1); continue to review and analyze Riverview Bank documents (1.8), review and analyze documents and prepare spreadsheet of Riverview Bank accounts and pool relationships (2.4)
10/12/22	B. Shattuck	2.8	Legal research and prepare research memorandum
10/12/22	J. Vance	2.5	Analyze response to discovery letter from Pacific Premier Bank (1.0); analyze issues for trial (1.5)
10/13/22	E. Decker	1.1	Virtual meeting with Joe Vance to discuss response to discovery questions from defendant banks (.2); draft supplemental discovery responses to Riverview Bank (.4); telephone call with Hannah Schmidt re discovery questions and document collection (.1); telephone call with Lisa Peterson to discuss document collection questions (.1); revise draft letter to Riverview Bank's counsel re receiver's discovery responses (.3)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/13/22	L. Peterson	3.3	Telephone call from Edward Decker to discuss document collection questions (.1); telephone call with Zachary Larmer re collection of Hamstreet emails (.2); research, review, and analyze documents for investor spreadsheets, and prepare spreadsheet of metadata (1.5); email to Edward Decker re investor spreadsheets (.2); emails with Zachary Larmer re monthly invoice and update to access to Relativity database (.1); review documents attached to email from Hannah Schmidt and locate and email document Bates numbers of same to Edward Decker (.4); continue to review and analyze database re Riverview Bank (.8)
10/13/22	B. Shattuck	3.7	Legal research and prepare research memorandum
10/14/22	L. Giles	2.5	Draft protective orders
10/14/22	B. Shattuck	0.9	Legal research
10/16/22	C. McCoy	1.5	Input objective coding within receiver's eighth production
10/17/22	D. Foraker	0.1	Emails re cancellation of bi-monthly meeting with AEM investors' counsel
10/17/22	B. Shattuck	0.5	Legal research
10/18/22	E. Decker	1.6	Virtual meeting with Joe Vance, Lorie Giles, and Ben Shattuck to discuss discovery projects and ongoing research and analysis (.4); telephone calls with Hannah Schmidt to discuss collection of emails and other potentially responsive documents (.5); virtual meeting with Lisa Peterson to discuss document collections and searches (.2); analyze research on proper scope of 30(b)(6) depositions (.2); revise draft outline for protective order (.3)
10/18/22	C. McCoy	2.5	Input objective coding within receiver's eighth production

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/18/22	L. Peterson	2.8	Virtual meeting with Edward Decker re document collections and searches (.2); emails with Hannah Schmidt and Zachary Larmer re collection of Hamstreet emails (.3); review file for original search terms run on Hamstreet emails (.4); email to Zachary Larmer with instructions for post-collection processing of Hamstreet emails (.2); review and analyze email database for Pacific Premier Bank's search terms (1.7);
10/18/22	B. Shattuck	5.8	Legal research and prepare research memorandum (5.4); virtual meeting with Joe Vance, Edward Decker, and Lorien Giles to discuss discovery and ongoing research (.4)
10/18/22	J. Vance	3.5	Virtual meeting with Edward Decker, Lorien Giles, and Ben Shattuck (.4); prepare memorandum to Clyde Hamstreet and Hannah Schmidt for 10/20 meeting (3.1)
10/19/22	E. Decker	2.0	Draft supplemental responses to Riverview Bank's interrogatories and requests for production (1.7); telephone call with Hannah Schmidt to discuss investor fund flow analysis (.1); virtual meeting with Lisa Peterson to discuss analysis of documents re Riverview Bank (.2)
10/19/22	D. Foraker	0.6	Review Joe Vance's memorandum for 10/20 meeting (.2); prepare for 10/20 meeting (.4)
10/19/22	C. McCoy	2.6	Input objective coding within receiver's eighth production (2.1); collaborative work session with Lisa Peterson (.5)
10/19/22	L. Peterson	3.0	Update document index (.5); virtual meeting with Edward Decker to discuss analysis of documents re Riverview Bank (.2); export field coding for certain offering documents from electronic database and email to Edward Decker (.3); collaborative work session with Carol McCoy re analysis of documents re Riverview Bank (.5); download and review pool spreadsheets and MIMO file compiled by Hannah Schmidt and prepare instructions for inclusion in electronic database (.7); research and respond to Joe Vance re inquiry from Annie Banks re inclusion of attachments in receiver's email productions (.8)
10/19/22	B. Shattuck	1.9	Revise and finalize research memorandum

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/19/22	J. Vance	0.8	Revise memorandum for 10/20 meeting (.4); review and respond to discovery issues (.4)
10/20/22	E. Decker	1.9	Draft supplemental responses to Riverview Bank's discovery requests
10/20/22	D. Foraker	3.0	Attend meeting at Hamstreet offices with Clyde Hamstreet, Hannah Schmidt, Mike Ueltzen (via videoconference), and Joe Vance
10/20/22	C. McCoy	3.6	Review Riverview Bank document production bank account documentation and update database coding accordingly (3.3); virtual meeting with Lisa Peterson (.3)
10/20/22	L. Peterson	2.2	Virtual meeting with Carol McCoy to discuss document review (.3); communications with Joe Vance re email discovery issue (.2); emails with Hannah Schmidt re document productions available in Relativity (.1); emails to Streamline Imaging with instructions and ShareFile links for additions to Relativity, and to request access for Martha Cohn (1.4); email to Hannah Schmidt re 2019 email with investor list (.1); emails with Edward Decker re investor reports and MIMO file (.1)
10/20/22	B. Shattuck	2.3	Legal research
10/20/22	J. Vance	4.3	Attend meeting at Hamstreet offices (3.0); review and edit discovery responses (1.3)
10/21/22	E. Decker	2.6	Draft letter to Pacific Premier Bank's counsel in response to questions re discovery (1.5); revise draft supplemental responses to Riverview Bank's discovery requests (.6); virtual meeting with Joe Vance to discuss upcoming depositions (.2); oversee collection and analysis of receiver's emails (.3)
10/21/22	D. Foraker	1.4	Telephone conference with Clyde Hamstreet re case strategy matters (.3); telephone conference with Hannah Schmidt re case strategy matters (.3); virtual meeting with Tom Sand (.8)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/21/22	C. McCoy	1.2	Review Riverview Bank document production bank account documentation and update database coding accordingly
10/21/22	L. Peterson	2.7	Communications with Joe Vance re production issues (.4); emails with Sarah Houser re Relativity report and re additions to Relativity database (.5); prepare ShareFile of additional productions for inclusion in Relativity (1.1); search Relativity database for all instances of March 2019 investor list (.2); update document index (.1); emails with Edward Decker re Pacific Premier Bank search terms (.2); prepare instructions for addition of 2018 investor list in electronic database (.2)
10/21/22	T. Sand	1.6	Virtual meeting with David Foraker re background facts and litigation strategy (.8); begin review of pleadings (.8)
10/21/22	B. Shattuck	0.9	Legal research
10/21/22	J. Vance	0.4	Communications with Lisa Peterson re production issues
10/23/22	C. McCoy	2.3	Update database coding re bank accounts within Riverview Bank production
10/24/22	E. Decker	4.4	Virtual meeting with Lisa Peterson to discuss analysis of documents in response to Pacific Premier Bank requests (.5); virtual meeting with Joe Vance to discuss responses to Pacific Premier Bank's requests and depositions (.4); email to Pacific Premier Bank counsel re privilege logs (.3); telephone call with Hannah Schmidt re data collection issues (.2); draft responses to Pacific Premier Bank's questions re document productions (2.5); prepare for depositions of Riverview Bank witnesses (.5)
10/24/22	L. Giles	7.7	Draft motion for protective order and related research

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/24/22	L. Peterson	7.3	Virtual meeting with Edward Decker to discuss analysis of documents in response to Pacific Premier Bank requests (.5); emails with Joe Vance re investor spreadsheet issue (.3); review files re processing of email accounts collected from AEI servers and email to Edward Decker re same (.8); prepare additional productions for inclusion in Relativity database and email ShareFile links to Sarah Houser (3.5); email to Zachary Larmer re status of Hamstreet email collection (.1); search email database for Pacific Premier Bank additional search terms (2.0); message to Edward Decker re results of first 65 search terms (.1)
10/24/22	T. Sand	2.0	Continue review of background pleadings
10/24/22	B. Shattuck	1.7	Legal research
10/24/22	J. Vance	2.0	Virtual meeting with Edward Decker (.4); email to Annie Banks re discovery issue (.5); analyze issues for depositions (1.1)
10/25/22	E. Decker	3.1	Virtual meeting with Lorien Giles and Ben Shattuck re depositions and research projects (.4); draft responses to Riverview Bank's discovery requests (1.0); draft response to Pacific Premier letter re discovery (.7); revise draft motion for protective order (1.0);
10/25/22	L. Giles	4.0	Revise draft of motion for protective order (3.4); virtual meeting with Edward Decker and Ben Shattuck (.4); conference with Eric Mills re preparation for depositions of Riverview Bank witnesses (.2)
10/25/22	H. Harmon	0.2	Prepare notice of appearance for Tom Sand and Edward Decker
10/25/22	C. McCoy	4.6	Virtual meeting with Lisa Peterson re continuing searches for new Pacific Premier Bank search terms (.5); conduct and save specific searches in email database requested by Pacific Premier Bank (4.1)
10/25/22	E. Mills	0.2	Conference with Lorien Giles re preparation for depositions of Riverview Bank witnesses



<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/25/22	L. Peterson	1.0	Virtual meeting with Carol McCoy re instructions for continuing searches for new Pacific Premier Bank search terms (.5); virtual meeting with Ben Shattuck re document review in database (.5)
10/25/22	T. Sand	0.6	Continue review of background pleadings and documents
10/25/22	B. Shattuck	7.1	Virtual meeting with Edward Decker and Lorien Giles re depositions and research projects (.4); virtual meeting with Lisa Peterson re document review in database (.5); document review in database re offering materials (2.8); research re knowledge standard for aiding and abetting liability (3.4)
10/26/22	E. Decker	1.4	Conference with Lisa Peterson re productions (.4); draft response to Pacific Premier Bank's letter re discovery responses (1.0)
10/26/22	L. Giles	6.6	Legal research
10/26/22	C. McCoy	3.2	Conduct and save specific searches in email database requested by Pacific Premier Bank
10/26/22	L. Peterson	4.8	Conference with Edward Decker re productions (.4); review pool spreadsheets in electronic database, tag for production, and draft instructions for production (.8); email to Hannah Schmidt to request replacement files for certain pool spreadsheets (.1); messages with Heather Harmon re documents needed from Pacific Premier Bank and Riverview Bank productions (.2); organize pdf sets of Pacific Premier Bank and Riverview Bank productions (.5); emails with Sarah Houser re issues concerning additions to Relativity database (.2); review and analyze text files listed in spreadsheet from Sarah Houser associated with receiver's email productions for privilege and remove if clawed back (2.6)
10/26/22	B. Shattuck	5.3	Legal research
10/27/22	E. Decker	1.8	Virtual meeting with Joe Vance to prepare for conferral with Pacific Premier Bank (.3); confer with counsel for Pacific Premier Bank re depositions (1.0); revise outline for motion for protective order (.5)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/27/22	L. Peterson	2.5	Review, research, and respond to emails with Sarah Houser re additions to Relativity database and resolution of issues to load files (1.3); continue to review email database for Pacific Premier Bank's new search terms and email update to Edward Decker (1.0); prepare metadata spreadsheet of search term hits (.2)
10/27/22	B. Shattuck	6.4	Legal research and prepare research memorandum
10/27/22	J. Vance	2.5	Virtual meeting with Edward Decker (.3); confer with counsel for Pacific Premier Bank re depositions (1.0); analyze discovery issues (1.2)
10/28/22	E. Decker	1.6	Revise outline for motion for protective order (.4); draft letter to Pacific Premier Bank's counsel re receiver's discovery responses (.8); analyze results of new keyword searches requested by Pacific Premier Bank and review emails and messages from Lisa Peterson (.4)
10/28/22	L. Peterson	4.4	Resolve issues re missing images from Riverview Bank productions and related emails (.8); continue to review documents based on Pacific Premier Bank's recent search terms and email to Edward Decker with brief summary and spreadsheet of metadata re same (1.2); search email database and verify to Edward Decker that emails with Pacific Premier Bank and Riverview Bank have been produced (.8); continue to review and analyze emails (1.3); message to Edward Decker re same (.1); update document index (.2)
10/28/22	B. Shattuck	7.0	Legal research and prepare research memorandum
10/29/22	B. Shattuck	2.9	Legal research

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
10/31/22	E. Decker	4.3	Meeting with Ben Shattuck to discuss research project (.4); conference with Lisa Peterson to discuss upcoming production, database management, and import of additional data (.5); telephone call with Hannah Schmidt to discuss import of additional data (.1); analyze email data previously produced to defendants (1.2); draft response to Pacific Premier Bank's questions re document productions (1.5); review case law on aiding and abetting liability (.3); virtual meeting with AEM investors' counsel and Hannah Schmidt re litigation status updates (.3)
10/31/22	D. Foraker	0.3	Virtual meeting with Chris Kayser, John Rake, Jon Hunt, Bridget Donegan, Hannah Schmidt, Edward Decker, and Joe Vance re litigation status updates
10/31/22	L. Giles	7.8	Revise draft of motion for protective order
10/31/22	H. Harmon	0.2	Prepare attorney working notebooks for Greg Usselman deposition transcript and exhibits
10/31/22	L. Peterson	5.2	Review and edit MIMO file to remove work product highlighting (3.2); conference with Edward Decker to discuss upcoming production, database management, and import of additional data (.5); email to Hannah Schmidt re MIMO file (.1); telephone call with Hannah Schmidt to discuss issues re computer collections and pool spreadsheets (.3); analyze hard drive containing forensically collected computers and research file types (.5); telephone call to Zach Larmer re possibility of Streamline Imaging processing forensically collected computer files (.2); email to Edward Decker re computer files (.2); update document index (.2)
10/31/22	T. Sand	0.4	Review file memorandum analyzing banks' defenses
10/31/22	B. Shattuck	3.8	Legal research (3.2); meeting with Edward Decker to discuss research project (.4); email to Edward Decker and Joe Vance re legal research (.2)
10/31/22	J. Vance	1.5	Prepare discovery requests (.5); virtual meeting with AEM investors' counsel and Hannah Schmidt re litigation status updates (.3); analyze legal issues (.7)

**Fee Summary**

<b><u>Professional</u></b>	<b><u>Title</u></b>	<b><u>Time</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
T. Sand	Partner	4.6	\$825	\$3,795.00
D. Foraker	Partner	6.4	630	4,032.00
J. Vance	Partner	31.0	550	17,050.00
E. Decker	Partner	42.7	475	20,282.50
E. Mills	Associate	1.4	410	574.00
L. Giles	Associate	37.4	380	14,212.00
B. Shattuck	Associate	70.3	350	24,605.00
C. McCoy	Paralegal	47.6	280	13,328.00
L. Peterson	Paralegal	54.0	280	15,120.00
H. Harmon	Paralegal	0.6	225	135.00
<b>Summary Total:</b>		<b>296.0</b>		<b>\$113,133.50</b>

**Disbursement Summary**

<b><u>Disbursements</u></b>	<b><u>Amount</u></b>
Streamline Imaging: Hosting fees only in September	1,325.00
<b>Disbursement Total:</b>	<b>\$1,325.00</b>

**Invoice Summary**

Professional Fees Through October 31, 2022	\$113,133.50
Disbursements	<u>\$1,325.00</u>
<b>Amount Due - Current Period:</b>	<b><u>\$114,458.50</u></b>



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: 2197115  
November 4, 2022

**Invoice Summary**

Professional Fees Through October 31, 2022	\$2,142.00
Disbursements	\$0.00
<b>Amount Due – Current Period:</b>	<b><u>\$2,142.00</u></b>

**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**

<b><u>Date</u></b>	<b><u>Professional</u></b>	<b><u>Time</u></b>	<b><u>Description of Services</u></b>
10/03/22	J. Knapp	0.3	Review court approval status of class action settlement agreement (.2); email communications with Bridget Donegan re Beattie supplemental agreement (.1)
10/04/22	J. Knapp	0.6	Emails with Bridget Donegan re Beattie supplemental agreement (.2); review and comment on Beattie supplemental agreement (.2); emails with Hannah Schmidt and Clyde Hamstreet re same (.2)
10/06/22	J. Knapp	0.8	Emails with Hannah Schmidt re Beattie supplemental agreement (.2); emails with Bridget Donegan re Beattie supplemental agreement (.1); email communications with John Rake re court approval process for class action and supplemental settlement agreements (.3); email communications with John Stephens re class action supplemental agreement (.2)
10/11/22	J. Knapp	0.4	Email communications with Bridget Donegan re Beattie supplemental agreement (.2) review copy of fully-executed Beattie supplemental agreement (.1); email communications with Hannah Schmidt re same (.1)
10/13/22	J. Knapp	0.1	Email communications with John Stephens re class action supplemental agreement
10/24/22	J. Knapp	0.5	Emails with Tim DeJong re settlement approval status (.3); emails with John Rake re class action supplemental settlement agreement (.2)
10/25/22	J. Knapp	0.3	Email communications with John Rake re class action supplemental settlement agreement
10/28/22	J. Knapp	0.6	Emails with John Rake re class action supplemental settlement agreement (.2); review class action supplemental settlement agreement (.2); emails with Clyde Hamstreet re class action supplemental settlement agreement (.2)

**Fee Summary**

<b><u>Professional</u></b>	<b><u>Title</u></b>	<b><u>Time</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
J. Knapp	Partner	3.6	\$595	\$2,142.00
<b>Summary Total:</b>		<b>3.6</b>		<b>\$2,142.00</b>

**Invoice Summary**

Professional Fees Through October 31, 2022	\$2,142.00
Disbursements	<u>\$0.00</u>
<b>Amount Due - Current Period:</b>	<b><u>\$2,142.00</u></b>

# EXHIBIT C





SPECIALIZED  
FORENSIC  
INVESTIGATIONS

# Invoice

Specialized Forensic Investigations LLC

5701 Lonetree Blvd., Suite 212  
Rocklin, CA 95765

Invoice Date:	Invoice #:
11/2/2022	1720

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
12/2/2022	Hamstreet & Associates	

Date	Description	Hours	Rate	Amount
10/6/2022	Phone call	0.4	300.00	120.00
10/31/2022	Preparation for and call with Hamstreet and Ueltzen	1.1	300.00	330.00
	Phone call			
	Preparation for and call with Hamstreet and Ueltzen			

Thank you for your business.

**Total** \$450.00

**Payments/Credits** \$0.00

**Balance Due** \$450.00

# 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  
October 2022 Services

Date	Description	Person	Hours	Rate	Amount
10/6/2022	Call and review of materials. Discussion with HS	MU	1.2	450.00	\$ 540.00
10/7/2022	Macro Analysis materials; correspondence	MU	2.3	450.00	1,035.00
10/12/2022	Call regarding report requirements	MU	0.5	450.00	225.00
10/18/2022	Preparation for meeting	MU	1.6	450.00	720.00
10/19/2022	Preparation for meeting	MU	0.8	450.00	360.00
10/20/2022	Meeting with counsel and client and related preparation	MU	2.4	450.00	1,080.00
10/22/2022	Summary of Tasks	MU	1.1	450.00	495.00
10/31/2022	Call with accounting team	MU	1.2	450.00	540.00
Total Fees					<u>\$ 2,520.00</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	14738
Date	10/31/22
Job Number	AEM-003
PO#	--
Charge#	--

**Job Name:** Microsite Updates & Maintenance

**Agency Contact** Brian Gard

**Description:** For Professional Services Rendered Through October, 2022:

Description	Hours Billed	Amount
Account Services	1.05	\$165.00
<b>Professional Services Subtotal:</b>	<b>1.05</b>	<b>\$165.00</b>
 <b>TOTAL:</b>	 <b>1.05</b>	 <b>\$165.00</b>

**PAYMENT TERMS:** net 30 days

**\$165.00**

# 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
10/31/2022	22482
Terms	Service Through
	10/31/2022

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

Date	By	Services	Hours	Rates	Amount
10/03/2022	DV/LB	RL team call	1.10	\$ 50.00/hr	\$ 55.00
10/03/2022	DV/LB	Development Call	0.30	\$ 50.00/hr	\$ 15.00
10/05/2022	DV/LB	communications with Lot 11 buyer and MiFEL BANK re: trust wiring info	1.00	\$ 50.00/hr	\$ 50.00
10/18/2022	DV/LB	Lot 11 - phone communications with buyer re: wire transfer	0.90	\$ 50.00/hr	\$ 45.00
10/21/2022	DV/LB	Lot 11 follow up	0.20	\$ 50.00/hr	\$ 10.00
10/21/2022	DV/LB	Internal communications with accountant re: commission and development payments for MDP	0.30	\$ 50.00/hr	\$ 15.00
10/21/2022	DV/LB	Internal call with LM and IM	1.50	\$ 50.00/hr	\$ 75.00

**Total Hours** 5.30 hrs  
**Total Legal fees** \$ 265.00  
**Total Amount** \$ 265.00

**In Reference To: General (Legal fees)**

Date	By	Services	Hours	Rates	Amount
10/03/2022	IM	Team meeting multi-matter discussion re. trust recording process, mar de plata, corporate, templates, closing process, etc	1.00	\$ 130.00/hr	\$ 130.00
10/03/2022	DV/LB	Tamar 100 Closing - Review draft deed nd schedule closing appointment	0.80	\$ 100.00/hr	\$ 80.00
10/03/2022	DV/LB	Prepare Pending items for Team call	1.00	\$ 100.00/hr	\$ 100.00



10/03/2022	BR	<b>Conference call:</b> Daniela, RL team re: diverse pending legal matters.	1.00	\$ 350.00/hr	\$ 350.00
10/04/2022	IM	Communications wDaniela re. AEM 400 filing doc; revisions and execution	0.20	\$ 130.00/hr	\$ 26.00
10/05/2022	DV/LB	Tamar 201 closing: review draft deed	1.00	\$ 100.00/hr	\$ 100.00
10/05/2022	BR	<b>Communications:</b> Diverse accountants re: tax planning needs. Salvador re: his fees for services.	0.35	\$ 350.00/hr	\$ 122.50
10/06/2022	BR	<b>Review:</b> and comment on AEMEMMX Tamar draft deed; communications Daniela re: same.	0.40	\$ 350.00/hr	\$ 140.00
10/10/2022	BR	<b>Meeting:</b> Ivan Bautista from Gossler re: proposed internal audit of tax compliance matters and go forward tax planning advice.	0.40	\$ 350.00/hr	\$ 140.00
10/12/2022	IM	call wDaniela re. Mex Tax ID Mifel	0.15	\$ 130.00/hr	\$ 19.50
10/17/2022	BR	<b>Communications:</b> Buyer and counsel, Daniela re: Tamar tomorrow's closing. Review DIs.	0.40	\$ 350.00/hr	\$ 140.00
10/18/2022	IM	follow up on delivery of AEM deeds; discussions on some corrections; prep email to Public Notary; internal discussions re. same	0.25	\$ 130.00/hr	\$ 32.50
10/18/2022	DV/LB	Tamar 100 coordinating closing details	1.00	\$ 100.00/hr	\$ 100.00
10/18/2022	BR	<b>Meeting:</b> Attend and execute deed Tamar 201 closing; Attend and execute deed Tamar 100 closing; review final version of deeds. Follow up.	2.00	\$ 350.00/hr	\$ 700.00
10/18/2022	BR	<b>Communications:</b> Client, internal, Salvador, tax advisors, re: internal tax compliance audit plan/disclosure docs. Client, Libi re: next week's meetings; Valerio and notary re Mar de Plata trust amendment recording.	1.00	\$ 350.00/hr	\$ 350.00
10/19/2022	DV/LB	Internal call wIM re: general outstanding pending	1.00	\$ 100.00/hr	\$ 100.00
10/19/2022	DV/LB	Creatre Disclosure Package Chanel	1.00	\$ 100.00/hr	\$ 100.00
10/19/2022	BR	<b>Communications:</b> team re: Disclosure Package for audit review. Review same.	0.40	\$ 350.00/hr	\$ 140.00
10/20/2022	DV/LB	Optimizing files	4.00	\$ 100.00/hr	\$ 400.00
10/20/2022	DV/LB	follow up Tamar 200 and E2 closings	0.50	\$ 100.00/hr	\$ 50.00
10/20/2022	BR	<b>Communications:</b> Client re: Hines property, potential brokers re: same. Review numbers form repatriation; communications accountants.	0.50	\$ 350.00/hr	\$ 175.00
10/21/2022	BR	<b>Communications:</b> Client, team re: next week's meetings.	0.25	\$ 350.00/hr	\$ 87.50
10/21/2022	IM	Multi-matter discussion; closing process at MDP, analyze steps and internal process; Concall wDaniela Velazquez and Laura re. same	1.60	\$ 130.00/hr	\$ 208.00
10/21/2022	DV/LB	Communications re: termination of Tamar property management agreement	0.50	\$ 100.00/hr	\$ 50.00
10/24/2022	BR	<b>Communications:</b> client, team re: diverse pending matters.	0.40	\$ 350.00/hr	\$ 140.00

10/25/2022	BR	<b>Communications:</b> Meeting Client re: diverse pending matters incl. East Cape, Todos Santos and Hines. Follow up team and CPA. Prep for meetings with and discussions tax advisors. Communications El Coyote developer re: Hines property. Review Hines docs. Communications Valerio re: clarification act re: Mar de Plata trust. Follow up Daniela re: Tamar and E2 closings.	3.00	\$ 350.00/hr	\$ 1,050.00
10/26/2022	BR	<b>Meeting:</b> Client re: tax compliance and structuring for East Cape trust, Todos Santos, capital return. Meeting CPA Palomino and client; meeting client and external tax advisors/CPAs re tax compliance, structuring and audit proposals/intros. Review a background files and meeting prep. Draft and send Follow up emails re scope of work to CPAs Alex Centeno and Ivan Bautista.	5.50	\$ 350.00/hr	\$ 1,925.00
10/26/2022	DV/LB	Review Draft Deed for Condo E2 and Tamar 200	0.80	\$ 100.00/hr	\$ 80.00
10/26/2022	DV/LB	Follow up Tax Bills from Valerio closing	0.20	\$ 100.00/hr	\$ 20.00
10/26/2022	DV/LB	Filling know your client form request by Trustee for Tamar closings	0.70	\$ 100.00/hr	\$ 70.00
10/27/2022	DV/LB	Condo E2: communications with agent and draft Commission agreement	1.00	\$ 100.00/hr	\$ 100.00
10/31/2022	BR	Local Management & Banking Support (AEMEMMX S DE RL DE CV) Oct, 2022	Flat Fee	\$ 200.00	\$ 200.00
10/31/2022	BR	<b>Follow up:</b> internal re: lost Hines apostilled transfer docs and possible solution. Follow up El Coyote/Maravia developer.	0.35	\$ 350.00/hr	\$ 122.50

**Total Hours** 32.65 hrs  
**Total Legal fees** \$ 7,548.50  
**Total Amount** \$ 7,548.50

**In Reference To: Incorporation (Legal fees)**

Date	By	Services	Hours	Rates	Amount
10/28/2022	IM	follow up on RNIE notices, meeting wVelazquez and Ben re. same	0.50	\$ 0.00/hr	No Charge

**Total Hours** 0.50 hrs  
**Total Amount** \$ 0.00

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

Date	By	Services	Hours	Rates	Amount
10/05/2022	IM	Communications wDaniela re. eviction clause on Mar de Plata Trust deeds; follow up on pendings	0.40	\$ 130.00/hr	\$ 52.00
10/13/2022	IM	Internal meeting wLaura and Daniela re. EIS and pendings; Call wEnvironmental Team re. EIS and pending docs	0.80	\$ 130.00/hr	\$ 104.00

10/17/2022	IM	Follow up on certified copies wTeam re. EIS process	0.15	\$ 130.00/hr	\$ 19.50
10/20/2022	IM	Prep email to Public Notary for MDP closings re. quotes and fees; email to Laura wsame	0.25	\$ 130.00/hr	\$ 32.50
10/24/2022	BR	<b>Communications:</b> Valerio, notary re: clarification act, Valerio re general update.	0.40	\$ 350.00/hr	\$ 140.00

**Total Hours** 2.00 hrs

**Total Legal fees** \$ 348.00

**Total Amount** \$ 348.00

<b>Total Hours</b>	40.45 hrs
<b>Total Legal fees</b>	\$ 8,161.50
<b>Total Invoice Amount</b>	<b>\$ 8,161.50</b>

**Notes:**

Thank you in advance for your prompt payment.