

E-FILED

12-09-2022, 16:29

Honorable David E. Gregerson
Scott G. Weber, Clerk
Clark County

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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 (NOVEMBER 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
(NOVEMBER 2022) - 1

4866-9754-9122.1

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 (November 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 November 2022. For this period, the Receiver
15 requests final approval of its compensation in the amount of \$37,187.50 and reimbursement of
16 no costs, for a total payment of \$37,187.50.

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 November
19 2022. For this period, such attorneys request final approval of their compensation in the amount
20 of \$192,802.00 and reimbursement of costs of \$41,498.21, for a total payment of \$234,300.21.

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 November 2022. For this period, such forensic accountants request final
24 approval of their compensation in the amount of \$1,770.00 and reimbursement of no costs, for a
25 total payment of \$1,770.00.

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 November 2022. For this period, such forensic accountant requests final approval of his
4 compensation in the amount of \$8,190.00 and reimbursement of no costs, for a total payment of
5 \$8,190.00.

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 November 2022. For this period, such consultants request final approval of
9 their compensation in the amount of \$375.00 and reimbursement of no costs, for a total payment
10 of \$375.00.

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 November 2022. For this period, such attorneys request final approval of their compensation
14 in the amount of \$2,474.50 and reimbursement of no costs, for a total payment of \$2,474.50.

15 Attached as Exhibit G hereto is a true and correct copy of the time and expense summary
16 of the Receiver's authorized special Montana foreclosure counsel, Crowley Fleck PLLP, for
17 services and costs in November 2022. For this period, such attorneys request final approval of
18 their compensation in the amount of \$2,124.00 and reimbursement of no costs, for a total
19 payment of \$2,124.00.

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1 Unless objections to the foregoing requests are filed with the Court and served on the
2 undersigned attorneys so as to be received by December 22, 2022, the Receiver may make the
3 payments requested herein and/or the professionals may apply their retainers, if any.

4 DATED this 9th day of December, 2022.

5 MILLER NASH LLP

6
7 /s/ John R. Knapp, Jr.

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

9 Attorneys for Receiver
10 Clyde A. Hamstreet & Associates, LLC
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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

December 9, 2022

Invoice # 2582

Professional Services

			<u>Hours</u>	<u>Amount</u>
11/1/2022	MC	Receivership Duties Handle administrative accounting. Research into old data storage and revival. Draft notice of sale. Begin work on the money in spread sheet.	4.40	660.00
	HS	Investor Relations Respond to questions from investors, call with M. Lower.	0.50	250.00
	HS	Receivership Duties Calls and emails with John Knapp regarding pending settlements. Emails to Ken McQuhae regarding same.	0.50	250.00
	HS	Litigation Support Work on data for damage expert.	1.50	750.00
	HS	Litigation Support Calls and related follow up with Lisa Peterson, Zach Lamar, Mickey Kramer, and Martha Cohn regarding production.	1.00	500.00
11/2/2022	HS	Investor Relations Call with Sherrie Beatie.	0.20	100.00
	HS	Receivership Duties Send updates for website to Gard. Coordinate settlements, LLC renewals, sale and notice for Montana property, and payment for Tamar expenses.	3.50	1,750.00
11/3/2022	CAH	Receivership Duties Review, discuss, and sign settlement agreements regarding DWT litigation. Work on deposition timing and case against banks.	0.40	240.00
	MC	Litigation Support Work on money in spreadsheet. Retrieve Lincoln Data computer from storage unit.	4.40	660.00
	HS	Litigation Support Review data on asset recovery.	2.00	1,000.00

			<u>Hours</u>	<u>Amount</u>
11/4/2022	CAH	Litigation Support Talk with Darren Farrell regarding expert witness.	0.40	240.00
	MC	Litigation Support Get Lincoln data computer running; discuss issues with Barbara Jacobs, Hannah Schmidt, and IT support. Handle calls from payers and resolve issue with Evergreen.	2.10	315.00
11/7/2022	MC	Receivership Duties Communications with borrowers, investors, and Evergreen. Handle contract accounting and check processing; begin Evergreen reconciliation.	3.10	465.00
	CAH	Receivership Duties Work with Hannah Schmidt on case status including update on selection of auditors for Mexico. Approve wire to Mexico.	0.40	240.00
	HS	Receivership Duties Respond to emails.	0.50	250.00
	HS	Receivership Duties Discuss case status with Clyde Hamstreet and selection of auditors for Mexico.	0.40	200.00
	HS	Litigation Support Call with Joe Vance.	0.50	250.00
11/8/2022	MC	Receivership Duties Make special assets agenda, look into delinquent payers, special assets call with Hannah Schmidt and Jesus Palomares. Draft letters to delinquent payers and follow up on special assets call. Work on Evergreen reconciliation.	3.60	540.00
	HS	Litigation Support Review 30(b)6 notices.	0.50	250.00
	HS	Receivership Duties Emails to title company regarding Montana sale.	0.20	100.00
	HS	Receivership Duties Special Assets call with Jesus Palomares and Marta Cohn.	0.70	350.00
11/9/2022	MC	Receivership Duties Letter to borrower, administrative organization and mailings; finish Evergreen reconciliation.	4.30	645.00
	HS	Receivership Duties Review and send correspondence to Trinity Mclure and Cedar Hart.	0.20	100.00
	HS	Litigation Support Review data for damage expert.	2.00	1,000.00
	HS	Receivership Duties Revise claims schedule for transfers and IRAs.	0.20	100.00

		<u>Hours</u>	<u>Amount</u>
11/10/2022	MC Receivership Duties Assemble demand letter form template, work on money and spreadsheet.	2.80	420.00
	HS Receivership Duties Call with Evelyn Torres regarding Todos Santos.	0.30	150.00
	HS Litigation Support Review Data for damage expert. Discuss with Martha Cohn.	2.30	1,150.00
11/11/2022	MC Litigation Support Format and check through damage spreadsheet. Call with networks on Lincoln Data retrieval.	5.00	750.00
	HS Litigation Support Call with Joe Vance.	0.50	250.00
	HS Litigation Support Search production for AEM 1. Discussion with Martha Cohn regarding spreadsheet for damages.	0.70	350.00
11/14/2022	MC Litigation Support Call with Mike Ueltzen and Paul Artley on damage calculation spreadsheet; respond to emails, mailings and administrative tasks.	5.50	825.00
	CAH Litigation Support Work with Hannah Schmidt on legal matters including our expert witness's knowledge of recent results on similar case.	0.40	240.00
	HS Litigation Support Call with Joe Vance, and related follow up work.	0.40	200.00
	HS Litigation Support Work with Martha Cohn on spreadsheet for damages.	0.50	250.00
	HS Litigation Support Work with Clyde Hamstreet on legal matters and expert witness's knowledge of recent case.	0.40	200.00
	HS Litigation Support Prepare for and call with Mike Ueltzen, Paul Artley and Martha Cohn regarding damages.	1.00	500.00
	HS Litigation Support Prepare for 30(b)(6) depositions.	2.00	1,000.00
11/15/2022	MC Litigation Support Damage calculation spreadsheet; call with Mike Ueltzen, Hannah Schmidt and Paul Artley.	4.00	600.00
	CAH Receivership Duties Discuss foreclosures of Ridgecrest lots that AEM has judgement against. Ross Miles appears to be beneficiary of foreclosure.	0.30	180.00

		<u>Hours</u>	<u>Amount</u>
11/15/2022	HS Litigation Support Prepare for deposition.	0.50	250.00
	HS Receivership Duties Prepare for and call with Evelyn Torres, Valerio Gonzalez and Veronica Hamstreet regarding Todos Santos.	0.70	350.00
	HS Receivership Duties Review foreclosure notices regarding Ridgecrest III. Research property. Email to Jesus Palomores regarding same.	1.00	500.00
	HS Litigation Support Call with Mike Ueltzen and Paul Artley regarding damages. Follow up research regarding same.	1.50	750.00
	HS Litigation Support Calls and emails regarding recovering Lincoln Data. Review Lincoln print outs from storage. Discuss with Clyde Hamstreet Ridgecrest foreclosures.	4.00	2,000.00
11/16/2022	MC Receivership Duties Wrap up damage calculation.	6.00	900.00
	HS Litigation Support Coordinate getting data to Cliff Hackney to run Lincoln reports.	1.00	500.00
	HS Litigation Support Work on recovery analysis and send draft to Lisa Peterson to share with experts.	2.00	1,000.00
	HS Receivership Duties Emails regarding Ridgcrest III foreclosures and Montana sale.	0.30	150.00
11/17/2022	MC Receivership Duties Administrative accounting, communications with investors; administrative tasks on Quickbooks.	1.70	255.00
	MC Litigation Support Draft memo regarding data sources.	2.50	375.00
	HS Riverview Bank Prepare for and attend Nagel deposition.	4.50	2,250.00
11/18/2022	MC Receivership Duties Communications with and mailings with the investors.	0.70	105.00
	MC Litigation Support Work on money spreadsheet.	1.40	210.00
	HS Riverview Bank Prepare for and attend Roberts deposition.	3.00	1,500.00
11/21/2022	MC Litigation Support Work on money in spreadsheet.	1.90	285.00

		<u>Hours</u>	<u>Amount</u>
11/21/2022	MC Receivership Duties Enter checks, contract accounting.	1.00	150.00
	HS Litigation Support Call with Mike Ueltzen and Paul Artley regarding information for damage report.	1.00	500.00
11/22/2022	MC Litigation Support Work on money spreadsheet; go through MAS data, fill in Pool 1 data from hard copies.	2.90	435.00
	MC Receivership Duties Cut checks.	0.30	45.00
	HS Receivership Duties Read and respond to emails.	0.50	250.00
	HS Litigation Support Review and coordinate documents for Mike Ueltzen and Paul Artley.	1.50	750.00
11/23/2022	MC Receivership Duties Review contract paperwork issue and respond to distribution questions.	1.00	150.00
	CAH Receivership Duties Prepare for and participate in Zoom meeting with Miller Nash team and Hannah Schmidt regarding status of case and strategy.	1.10	660.00
	HS Receivership Duties Call with Jesus Palomores regarding Ridgecrest foreclosures. Follow up email to Joe Vance regarding same.	0.90	450.00
	HS Litigation Support Call with Joe Vance, David Foraker, Edward Decker, Tom Sand and Clyde Hamstreet regarding case status.	0.60	300.00
11/28/2022	MC Receivership Duties Communications with investors, reconciliation of claims register with past checks issued; update addresses and information; preparation for distribution.	3.50	525.00
	CAH Receivership Duties Conference call with Joe Vance regarding timing on deposition and preparation for deposition. Reschedule meetings to accommodate banks' schedule.	0.50	300.00
11/29/2022	CAH Receivership Duties Work with Joe Vance on adjusting schedule for deposition. Review instructions for deponents and Second Amended Complaint for Money Damages.	1.60	960.00
11/30/2022	MC Receivership Duties Review and revise claims register and update per schedule.	2.00	300.00

	<u>Hours</u>	<u>Amount</u>
11/30/2022 CAH Receivership Duties Review documents in preparation for deposition.	1.50	900.00
MA Receivership Duties Email to Hannah Schmidt regarding property clean up and appliances. Contact Walt Snyder for more details.	0.40	130.00
MA Receivership Duties Email roof bracing information for Montana property to Hannah Schmidt.	0.10	32.50
HS Receivership Duties Read and respond to emails from vacation.	0.50	250.00
HS Receivership Duties Update Distribution schedule for IRAs.	0.90	450.00
For professional services rendered	118.10	\$37,187.50
Accounts receivable transactions		
11/30/2022 Payment invoice #2576- Thank You		(\$72,356.70)
Total payments and adjustments		(\$72,356.70)
Balance due		<u>\$37,187.50</u>

Consultant Summary			
Name	Hours	Rate	Amount
Clyde A. Hamstreet - Principal	6.60	600.00	\$3,960.00
Hannah Schmidt - Consultant	46.90	500.00	\$23,450.00
Martha Cohn - Jr. Consultant	64.10	150.00	\$9,615.00
Matthew Alford - Consultant	0.50	325.00	\$162.50

EXHIBIT B

Client.Matter	Description	Bill Amt	Fees	Costs	Bill Num
721921.0001	American Eagle Mortgage Investment Funds	\$17,433.50	\$16,508.50	\$925.00	2198978
721921.0017	Adjunct Litigation Claims Against Ross Miles, Maureen Wile, et al.	\$214,657.21	\$174,084.00	\$40,573.21	2198982
721921.0019	Investigation of Adjunct Litigation Claims Against AEI/AEMM Lenders	\$2,209.50	\$2,209.50	\$0.00	2198983
		\$234,300.21	\$192,802.00	\$41,498.21	



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: 2198978
December 5, 2022

Invoice Summary

Professional Fees Through November 30, 2022	\$16,508.50
Disbursements	<u>\$925.00</u>
Amount Due – Current Period:	<u>\$17,433.50</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>
11/01/22	B. Dickey	2.1	Prepare and file Washington reinstatement applications re American Eagle Mortgage 300, LLC, American Eagle Mortgage I, LLC, and American Eagle Mortgage Short Term, LLC 2022, prepare and file Washington annual report of American Eagle Mortgage II LLC, and prepare list of annual report deadlines
11/01/22	J. Knapp	1.0	Emails with Hannah Schmidt re Grays Harbor reconveyance request (.3); voicemail and telephone call with Hannah Schmidt re motion to reduce claim amounts and authorize second interim distribution (.2); review motion to reduce claim amounts and authorize second interim distribution (.1); email communications with Hannah Schmidt re McQuhae settlement agreement (.2); continue drafting McQuhae settlement agreement (.2)
11/02/22	B. Dickey	0.1	Email communications with Hannah Schmidt re status of Washington Secretary of State filings
11/02/22	J. Knapp	1.4	Email communications with Hannah Schmidt re signed McQuhae settlement agreement (.2); review signed McQuhae settlement agreement (.1); emails with Hannah Schmidt re Montana sale notice (.4); draft Montana sale notice (.7)
11/03/22	B. Dickey	0.3	Review filed reinstatements of American Eagle Mortgage Short Term, LLC, American Eagle Mortgage I, LLC, and American Eagle Mortgage 300, LLC
11/03/22	J. Knapp	1.6	Emails with Hannah Schmidt re Troy, Montana, sale notice (.2); continue drafting Troy, Montana, sale notice (.2); draft notice of settlement with McQuhae re American Securities judgment (1.0); emails with Naureen Khan re transmittal of Troy, Montana, sale notice for posting to website (.2)
11/04/22	D. Foraker	0.4	Review notices and related emails

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/04/22	J. Knapp	0.9	Finalize notice of McQuhae settlement (.7); emails with Naureen Khan re transmittal of notice of McQuhae settlement for posting to receiver's website (.2)
11/07/22	J. Knapp	1.5	Emails with Michael Ueltzen re notice of intent to compensate (October 2022) (.2); emails with Rosen Law billing department re notice of intent to compensate (October 2022) (.2); emails with Veronica Hamstreet re notice of intent to compensate (October 2022) (.2); draft notice of intent to compensate (October 2022) (.9)
11/08/22	D. Dohmen	0.9	Review relevant documents for updated demand letter for AEM Mexico 100 loan
11/08/22	J. Knapp	1.2	Emails with Paul Artley re notice of intent to compensate (October 2022) (.2); continue drafting notice of intent to compensate (October 2022) (.4); emails with Al Elkins re notice of claim transfer (.1); review schedule of allowed claims (.1); email communications with Hannah Schmidt re claim transfer and schedule of allowed claims (.2) email communications with Teri Yamauchi re notice of intent to compensate (October 2022) (.2)
11/08/22	J. Palomares	0.6	Prepare for and attend meeting with Hannah Schmidt re status of foreclosure matters
11/09/22	J. Knapp	0.7	Email communications with Joe Vance and Al Elkins re claim transfer and trial date (.2); email communications with Hannah Schmidt re claim transfer and schedule of allowed claims (.1); continue drafting notice of intent to compensate (October 2022) (.4)
11/10/22	J. Knapp	1.7	Finalize notice of intent to compensate (October 2022) (.3); review Lennis Gibbons returned mail (.1); emails with Hannah Schmidt re same (.1); telephone call and emails with Hannah Schmidt re Montana sale and title policy exceptions (.4); review Montana title policy (.2); emails with Greg Schultz re Montana sale and title policy (.4); review Montana buy-sell agreement (.2)
11/11/22	D. Dohmen	3.4	Draft third demand letter for AEM Mexico 100 loan and related research

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/11/22	J. Knapp	0.2	Email communications with Greg Schultz re Montana sale issues
11/12/22	D. Dohmen	1.8	Analyze additional case law re required forms to support updated demand letter for AEM Mexico 100 loan
11/13/22	D. Dohmen	1.5	Analyze laws and current status re California moratorium on residential foreclosures to assess ability to foreclose on AEM Mexico 100 loan
11/14/22	J. Knapp	0.8	Emails with Greg Schultz and Hannah Schmidt re Montana title report and property sale issues (.5); voicemails and telephone call with Hannah Schmidt re same (.3)
11/15/22	J. Knapp	0.8	Emails with Greg Schultz and Hannah Schmidt re Montana title insurance and survey issues (.5); voicemail from Rob Congdon re address change (.1); review various court filings (.2)
11/16/22	J. Knapp	0.8	Virtual meeting with Seth Row re title insurance issue (.1); emails with Hannah Schmidt and Greg Schultz re Montana survey and title insurance issue (.4); telephone call with Rob Congdon re mailing list (.1); emails with Hannah Schmidt re mailing list (.2)
11/17/22	J. Knapp	0.2	Voicemail from Rosalie Goodman re removal from special request list (.1); voicemail from Debra Sauer re change of address (.1)
11/18/22	D. Foraker	0.2	Emails with John Knapp re pending sales and settlements
11/18/22	J. Knapp	1.0	Emails with Greg Schultz re survey for Montana property (.2); emails with Hannah Schmidt re same (.2); emails with David Foraker re pending sales and settlements (.2); review court docket for any objections to sale and settlement notices (.2); emails with Heather Harmon re ex parte settlement approval motions (.2)
11/21/22	H. Harmon	0.2	Coordinate ex parte presentation of motion to approve receiver's proposed settlement with McQuhae re Cowlitz property

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/21/22	J. Knapp	1.4	Email communications with Greg Schultz re Montana survey status (.1); email communications with Hannah Schmidt re same (.1); draft ex parte motion papers for approval of McQuhae settlement (1.1); emails with Angela Stavrakis re Clark County e-filing (.1)
11/22/22	H. Harmon	0.1	Obtain conformed copies of motion and order to approve receiver's proposed settlement with McQuhae re Cowlitz property
11/22/22	J. Knapp	0.6	Review filed motions and declarations and entered orders approving settlements (.2); emails with Naureen Khan re transmittal of court filings for posting to website (.2); emails with Hannah Schmidt re approval of settlements (.2)
11/23/22	J. Knapp	0.2	Review various emails
11/23/22	J. Palomares	0.3	Telephone conference with Hannah Schmidt re Ridgecrest Development foreclosure notices and potential options to protect AEM trust deed interest
11/28/22	J. Knapp	0.6	Emails with Hannah Schmdit re revised allowed claims schedule (.2); emails with Hannah Schmidt re no objections to notice of intent to compensate (October 2022) (.2); draft letter to Judge Gregerson re proposed order on motion to reduce claim amounts and authorize second interim distribution (.2)
11/29/22	J. Knapp	0.7	Emails with Heather Harmon re procedure for submission of revised proposed order on motion to reduce claim amounts and authorize second interim distribution (.2); review master mailing list address changes (.2); email communications with Hannah Schmidt re master mailing list (.1); continue drafting letter to Judge Gregerson re revised proposed order granting motion to reduce claim amounts and authorize second interim distribution (.2)
11/29/22	J. Palomares	0.5	Analyze options to prevent foreclosures of Ridgecrest III and Ridgecrest II foreclosures by CKB Management Corporation (.3); review and revise third demand letter to Dana Havenner for default on AEM Mexico 100 loan on property in Trinity County, California (.2)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/30/22	D. Dohmen	0.2	Finalize third demand letter re AEM Mexico 100 loan
11/30/22	D. Foraker	0.1	Emails with John Knapp re hearing on receiver's motion to make second interim distribution
11/30/22	H. Harmon	0.3	Coordinate delivery of correspondence to Judge Gregerson with proposed order for December 2, 2022, hearing
11/30/22	J. Knapp	1.9	Emails with Hannah Schmidt and Martha Cohn re schedule of allowed claims for proposed order granting motion to reduce claim amounts and authorize second interim distribution (.5); emails with Greg Schultz and Hannah Schmidt re Montana survey (.5); review and comment on revised schedule of allowed claims (.7); finalize letter to Judge Gregerson re proposed order granting motion to reduce claim amounts and authorize second interim distribution (.2)

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
D. Foraker	Partner	0.7	\$630	\$441.00
J. Knapp	Partner	19.2	595	11,424.00
J. Palomares	Partner	1.4	475	665.00
D. Dohmen	Associate	7.8	395	3,081.00
B. Dickey	Paralegal	2.5	305	762.50
H. Harmon	Paralegal	0.6	225	135.00
Summary Total:		32.2		\$16,508.50

Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Washington Secretary of State , Date: 11/1/2022	840.00
Washington Secretary of State , Date: 11/1/2022	85.00
Disbursement Total:	\$925.00

Account: 721921

Invoice: 2198978

December 5, 2022

Invoice Summary

Professional Fees Through November 30, 2022

\$16,508.50

Disbursements

\$925.00

Amount Due - Current Period:

\$17,433.50



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: 2198982
December 5, 2022

Invoice Summary

Professional Fees Through November 30, 2022	\$174,084.00
Disbursements	<u>\$40,573.21</u>
Amount Due – Current Period:	<u>\$214,657.21</u>

To pay by wire transfer, route to:

Miller Nash LLP, U.S. Bank National Association
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Invoice Detail

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/01/22	E. Decker	5.3	Virtual meeting re discovery, upcoming motions, and depositions (.6); revise and send letter to Riverview Bank re discovery (.4); telephone conference with Lisa Peterson re document processing and analysis (.3); revise draft motion for protective order (2.8); analyze and respond to email from Pacific Premier Bank re scope of 30(b)(6) deposition topics (.8); revise draft letter to Pacific Premier Bank re responses to document discovery requests (.4)
11/01/22	L. Giles	4.8	Virtual meeting re discovery, upcoming motions, and depositions (.6); revise motion for protective order (4.2)
11/01/22	H. Harmon	0.2	Finalize second set of discovery requests to Riverview Bank and prepare for distribution and update case docketing (.1); prepare notice of appearance for electronic filing and distribution (.1)
11/01/22	L. Peterson	2.1	Telephone calls with Hannah Schmidt re processing forensically collected computers (.1); telephone conference with Edward Decker re document processing and analysis (.3); communications with Zachary Larmer re details of processing of computer files (.5); finalize production of Pool spreadsheets and MIMO file and provide instructions to litigation support team (.9); update document index (.3)
11/01/22	T. Sand	1.4	Review case management order re schedule (.1); review key documents re background of case (.5); virtual meeting with Joe Vance, Edward Decker, Ben Shattuck, and Lorien Giles re discovery, upcoming motions, and depositions (.6); email Annie Banks re discovery (.2)
11/01/22	B. Shattuck	2.6	Virtual meeting re discovery, upcoming motions, and depositions (.6); legal research (2.0)
11/01/22	J. Vance	2.3	Virtual meeting re discovery, upcoming motions, and depositions (.6); revise and edit communication to Shannon Armstrong re discovery (.6); review email from Annie Banks re discovery (.5); prepare for depositions (.6)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/02/22	E. Decker	5.5	Virtual meeting with Joe Vance re 30(b)(6) depositions (.8); meet and confer with counsel for Pacific Premier Bank re depositions (1.0); correspond with counsel for Pacific Premier Bank re 30(b)(6) deposition topics (1.0); virtual meeting with Lorien Giles to discuss legal research relating to motion for protective order (.2); virtual meeting with Ben Shattuck and Lorien Giles to discuss supporting declarations for motion for protective order (.2); revise draft motions for protective order (2.3)
11/02/22	L. Giles	2.4	Virtual meeting with Edward Decker re legal research relating to motion for protective order (.2); virtual meeting with Edward Decker and Ben Shattuck re supporting declarations for motion for protective order (.2); legal research (2.0)
11/02/22	L. Peterson	1.9	Prepare ShareFile for discovery and email to Edward Decker with summary (.4); meet with Zach Larmer at Streamline Imaging to deliver hard drive and discuss data (1.5)
11/02/22	T. Sand	0.2	Email Annie Banks re meet and confer on discovery disputes
11/02/22	B. Shattuck	2.0	Virtual meeting with Edward Decker and Lorien Giles to discuss supporting declarations for motion for protective order (.2); draft supporting declaration for protective order (1.8)
11/02/22	J. Vance	4.5	Virtual meeting with Edward Decker (.8); meet and confer with counsel for Pacific Premier Bank re depositions (1.0); revise and edit motions for protective order (2.7)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/03/22	E. Decker	7.8	Virtual meeting with Joe Vance to discuss motions for protective order and conferral with Pacific Premier Bank (.6); virtual meeting with John Knapp re settlement approvals in main receivership action (.2); virtual meeting with Ben Shattuck to discuss declaration in support of motion for protective order (.1); virtual meeting with Lorien Giles re research in support of motions for protective order (.3); revise draft motions for protective order (4.5); revise draft declaration in support of motions for protective order (.3); compile exhibits in support of motions for protective order (1.0); analyze new positions taken by Pacific Premier Bank re discovery (.8)
11/03/22	D. Foraker	1.8	Revise and edit motion for protective order and supporting declaration
11/03/22	L. Giles	5.9	Review Roberts deposition transcript (4.1); legal research (1.5); virtual meeting with Edward Decker re research in support of motions for protective order (.3)
11/03/22	H. Harmon	0.5	Prepare citation for hearing on motions for protective order and declaration with exhibits (.4); coordinate declaration signing with David Foraker via DocuSign (.1)
11/03/22	J. Knapp	0.2	Virtual meeting with Edward Decker re settlement approvals in main receivership action
11/03/22	L. Peterson	2.0	Communications with Edward Decker re Pacific Premier Bank search terms and production (.1); review plaintiff's first supplemental responses to Riverview Bank's discovery requests and prepare list of documents cited (.5); prepare documents for review by Lorien Giles (1.0); emails with Zachary Larmer re processing reports on Hamstreet email collection (.3); messages with Edward Decker re same (.1)
11/03/22	T. Sand	0.5	Review email to Hannah Schmidt re deposition schedule (.1); review draft motion for protective order and supporting declaration (.3); email from Joe Vance to Annie Banks (.1)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/03/22	B. Shattuck	2.1	Virtual meeting with Edward Decker to discuss declaration in support of motion for protective order (.1); revise motion for protective order (2.0)
11/03/22	J. Vance	5.1	Revise and edit motions for protective order (4.5); virtual meeting with Edward Decker (.6)
11/04/22	E. Decker	4.1	Virtual meeting with Joe Vance re motions for protective order (.5); virtual meeting with Lisa Peterson re data ingestion and upcoming productions (.4); virtual meeting with Lorien Giles re motion for protective order (.1); virtual meeting with Ben Shattuck re supporting exhibits for motion for protective order (.2); finalize motions for protective order and supporting documents (2.9)
11/04/22	L. Giles	1.2	Virtual meeting with Edward Decker re motion for protective order (.1); revise draft of motion for protective order (1.1)
11/04/22	H. Harmon	0.8	Assist with finalization of motions for protective order, including voluminous exhibits for declaration of Edward Decker, and coordinate e-filing and distribution
11/04/22	L. Peterson	2.4	Continue to prepare documents cited in response to Riverview Bank's discovery requests for review by Lorien Giles (1.4); telephone calls with Hannah Schmidt re unpacking Lincoln Data and MAS 90 data (.2); telephone call with Zachary Larmer re unpacking Lincoln data and MAS 90, and re Hamstreet email analysis of newly processed data (.4); virtual meeting with Edward Decker re data ingestion and upcoming productions (.4)
11/04/22	T. Sand	3.0	Review motion for protective order, supporting declaration, and documents (.8); review second amended complaint and memos analyzing case (2.0); email Joe Vance re strategy (.2)
11/04/22	B. Shattuck	3.7	Virtual meeting with Edward Decker re motion for protective order (.2); revise declaration in support of motion for protective order (1.4); enter cites in motion for protective order (.6); collect and organize exhibits for supporting declarations (.9); proofread declaration and confirm accuracy of cites (.6)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/04/22	J. Vance	4.2	Revise and edit drafts of motions for protective order (2.8); virtual meeting with Edward Decker (.5); prepare for depositions (.9)
11/07/22	E. Decker	3.9	Virtual meeting with Lorien Giles re Riverview Bank depositions (.4); virtual meeting with Joe Vance re discovery responses (.2); virtual meeting with Joe Vance and Lisa Peterson re import of additional data and upcoming productions (.4); virtual meeting with Lisa Peterson re productions to bank defendants (.2); finalize supplemental responses to Riverview Bank discovery requests (.5); revise letter in response to Pacific Premier Bank questions re discovery responses (.7); prepare productions to bank defendants (.6); analyze Pacific Premier Bank's motion for protective order (.9)
11/07/22	L. Giles	0.4	Virtual meeting with Edward Decker re Riverview Bank depositions
11/07/22	H. Harmon	0.1	Assist with finalizing the second supplemental responses to Riverview Bank's first discovery requests and prepare for distribution
11/07/22	L. Peterson	4.4	Virtual meeting with Edward Decker re productions to bank defendants (.2); prepare ShareFile for production and email with link to Edward Decker (.5); update document index (.3); search and review document hits on Pacific Premier Bank's October 2022 search terms list for terms on Peter Hawkes' search term list (2.1); telephone calls and emails with Zachary Larmer re import of additional data (.8); virtual meeting with Edward Decker and Joe Vance re import of additional data and upcoming productions (.4); email to Hannah Schmidt re Lincoln System data and old MAS 90 data (.1)
11/07/22	T. Sand	0.7	Review analysis of case and key supporting documents
11/07/22	B. Shattuck	7.8	Review Pacific Premier Bank's motion for protective order (.4); analyze case law cited in Pacific Premier Bank's motion and compile research into outline (7.4)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/07/22	J. Vance	5.1	Analyze motion for protective order (.8); virtual meeting with Edward Decker re discovery responses (.2); telephone call with Hannah Schmidt re deposition preparation (.5); virtual meeting with Edward Decker and Lisa Peterson (.4); prepare for depositions (3.2)
11/08/22	E. Decker	2.9	Virtual meeting with Tom Sand, Joe Vance, Lorien Giles, and Ben Shattuck re written discovery, depositions, and upcoming motions (.5); virtual meeting with Ben Shattuck re research in support of opposition to Pacific Premier Bank's motion for protective order (.1); draft outline of opposition to Pacific Premier Bank's motion for protective order (1.5); analyze cases cited by Pacific Premier Bank in its motion (.8)
11/08/22	L. Giles	1.4	Virtual meeting with Joe Vance, Edward Decker, Tom Sand, and Ben Shattuck re written discovery, depositions, and upcoming motions (.5); collect additional documents for deposition outlines (.9)
11/08/22	H. Harmon	0.2	Update ShareFile information with Greg Usselman deposition for expert
11/08/22	L. Peterson	1.2	Update document index (.4); emails with Heather Harmon re documents for expert (.1); emails with Lorien Giles re documents for depositions (.1); continue to review and analyze documents re Peter Hawkes' search terms against Pacific Premier Bank search term hits (.6)
11/08/22	T. Sand	0.6	Virtual meeting with Joe Vance, Edward Decker, Lorien Giles, and Ben Shattuck re written discovery, depositions, and upcoming motions (.5); review Joe Vance email to Shannon Armstrong re discovery (.1)
11/08/22	B. Shattuck	6.8	Edit outline re analyzing case law in Pacific Premier Bank's motion for protective order (1.2); virtual meeting with Joe Vance, Tom Sands, Edward Decker, and Lorien Giles re written discovery, upcoming motions, and depositions (.5); legal research and prepare file memorandum (5.1)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/08/22	J. Vance	3.0	Virtual meeting with Tom Sand, Edward Decker, Lorien Giles and Ben Shattuck (.5); prepare for and participate in conference call with expert (.8); analyze issues for trial (1.7)
11/09/22	E. Decker	3.9	Meeting with Tom Sand and Joe Vance re trial strategy (1.4); virtual meeting with Lorien Giles re Riverview Bank depositions (.3); analyze cases cited in Pacific Premier Bank's motion for protective order (1.0); draft opposition to Pacific Premier Bank's motion for protective order (1.2)
11/09/22	D. Foraker	0.2	Emails with Clyde Hamstreet and Hannah Schmidt and with litigation team re Kelley v. BMO Harris Bank jury verdict awarding damages against bank for aiding and abetting breach of fiduciary duty in connection with Tom Petters Ponzi scheme
11/09/22	L. Giles	3.8	Deposition outline and document review (3.5); virtual meeting with Edward Decker re Riverview Bank depositions (.3)
11/09/22	H. Harmon	0.3	Prepare notices of deposition for Teresa Nagel and Michael Roberts and prepare for distribution (.2); coordinate court reporting and videographer services and update case docketing (.1)
11/09/22	C. McCoy	3.8	Review deposition outlines to organize supporting documents for attorney review and in preparation for depositions
11/09/22	L. Peterson	3.7	Continue to review and analyze Pacific Premier Bank's October 2022 search term hits for Peter Hawkes' search terms, and segregate hits requiring further review (3.2); email to Edward Decker re document review and next steps (.5)
11/09/22	T. Sand	2.5	Meeting with Joe Vance and Edward Decker re trial strategy (1.4); review deposition transcripts and background documents (.9); email David Foraker re decisions in related case (.1); review notice of deposition (.1)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/09/22	B. Shattuck	1.2	Research case law in support of opposition to Pacific Premier Bank's motion for protective order
11/09/22	J. Vance	4.0	Meeting with Tom Sand and Edward Decker (1.4); exchange communications with Chip Paternoster re discovery (.2); analyze discovery issues (1.0); analyze issues for trial (1.4)
11/10/22	E. Decker	6.1	Virtual meeting with Joe Vance re opposition to Pacific Premier Bank's motion for protective order (.5); virtual meeting with Ben Shattuck re opposition to Pacific Premier Bank's motion for protective order (.2); virtual meeting with Lorien Giles re Riverview Bank depositions (.2); draft opposition to Pacific Premier Bank's motion for protective order (5.2)
11/10/22	L. Giles	7.4	Review opposition brief (.5); edit Teresa Nagel deposition outline (6.7); virtual meeting with Edward Decker re Riverview Bank depositions (.2)
11/10/22	C. McCoy	2.3	Prepare potential deposition exhibits for attorney review and in preparation for the deposition of Teresa Nagel
11/10/22	L. Peterson	0.9	Update document index (.1); email to Lorien Giles re Riverview Bank accounts (.1); review emails re search terms provided to SEC and email to Hannah Schmidt re final search terms list (.3); email to Edward Decker re search terms (.1); telephone call with Joe Vance re search terms protocol (.1); email to Joe Vance, Edward Decker, and Carol McCoy re search terms protocol (.2)
11/10/22	T. Sand	0.4	Review draft opposition to bank defendants' motion for protective order (.2); review case law (.2)
11/10/22	B. Shattuck	6.3	Research case law in support of opposition to Pacific Premier Bank's motion for protective order (3.4); review deposition transcripts of Greg Usselman and collect excerpts for exhibits (1.9); review and proofread opposition to Pacific Premier Bank's motion for protective order (.8); virtual meeting with Edward Decker re research for opposition to Pacific Premier Bank's motion (.2)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/10/22	J. Vance	2.3	Revise and edit response to motion for protective order (1.8); virtual meeting with Edward Decker re same (.5)
11/11/22	E. Decker	2.8	Virtual meeting with Joe Vance re opposition to Pacific Premier Bank's motion for protective order (.1); meeting with Ben Shattuck re opposition to Pacific Premier Bank's motion for protective order (.2); virtual meeting with Lorien Giles re Riverview Bank depositions (.4); finalize opposition to Pacific Premier Bank's motion for protective order (2.1)
11/11/22	D. Foraker	0.3	Review emails marked confidential to be filed by bank defendants
11/11/22	L. Giles	7.0	Edit Teresa Nagel deposition outline (3.1); draft Michael Roberts deposition outline (3.5); virtual meeting with Edward Decker re Riverview Bank depositions (.4)
11/11/22	C. McCoy	0.3	Organize attorney review set of documents in support of opposition motion
11/11/22	L. Peterson	1.6	Prepare ShareFile of additional productions for inclusion in database and email links to Sarah Houser (.8); search results of Pacific Premier Bank search term his for search terms provided to SEC (.8)
11/11/22	T. Sand	0.9	Review pleadings re pending discovery motions (.3); review plaintiff's briefing for filing and service (.6)
11/11/22	B. Shattuck	1.1	Draft declaration in support of opposition to Pacific Premier Bank's motion for protective order (.3); add cites to exhibits in motion (.4); proofread opposition to Pacific Premier Bank's motion (.2); meeting with Edward Decker re opposition to Pacific Premier Bank's motion for protective order (.2)
11/11/22	J. Vance	4.5	Prepare for and participate in deposition preparation call with Hannah Schmidt (1.5); review and revise response to motion for protective order (1.0); virtual meeting with Edward Decker re opposition to Pacific Premier Bank's motion for protective order (.1); prepare for depositions (1.9)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/12/22	E. Decker	0.4	Analyze bank defendants' oppositions to motion for protective order (.2); virtual meeting with Ben Shattuck re reply in support of protective order (.2)
11/12/22	B. Shattuck	4.6	Virtual meeting with Edward Decker re reply in support of protective order (.2); legal research (4.4)
11/13/22	L. Giles	4.2	Review bank defendants' oppositions to motion for protective order (.8); research cases cited in opposition briefs (2.3); draft reply outline (1.1)
11/14/22	E. Decker	5.9	Virtual meeting with Ben Shattuck re reply in support of motion for protective order (.5); virtual meeting with Joe Vance re reply in support of motion for protective order and data collections (.4); virtual meeting with Lisa Peterson re data collections (.3); research in support of protective order (1.5); draft reply in support of motion for protective order (3.2)
11/14/22	D. Foraker	0.2	Emails re cancellation of bi-monthly AEM receiver/AEM investor meeting and related emails
11/14/22	L. Giles	6.4	Draft reply in support of motion for protective order and related legal research
11/14/22	H. Harmon	0.5	Prepare opposition to Pacific Premier Bank's motion for protective order for electronic filing and delivery of judge's working copies (.2); prepare attorney working notebook of motion for protective order pleadings for hearing preparation (.3)
11/14/22	L. Peterson	4.0	Continue to search SEC terms list against the Pacific Premier Bank's October 2022 search terms (1.4); update document index (.5); virtual meeting with Edward Decker re data collections (.3); brief review of database and third set of Hamstreet emails (.3); search for and review emails and meeting notes re original forensic collection (1.3); draft email to Joe Vance re same (.2)
11/14/22	T. Sand	0.4	Review bank defendants' oppositions to motion for protective order

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/14/22	B. Shattuck	11.0	Outline reply in support of protective order (10.5); virtual meeting with Edward Decker re reply in support of motion for protective order (.5)
11/14/22	J. Vance	3.5	Telephone call with Hannah Schmidt re strategy (.3); analyze bank defendants' oppositions to motions for protective order (1.3); virtual meeting with Edward Decker (.4); research issues for trial (1.5)
11/15/22	E. Decker	5.2	Virtual meeting with Joe Vance, Lorien Giles, and Ben Shattuck re discovery motions and upcoming depositions (.2); telephone call with Lisa Peterson re potentially privileged documents (.2); revise draft reply in support of motion for protective order (2.8); review potentially privileged documents (.7); prepare for Teresa Nagel deposition (1.3)
11/15/22	L. Giles	8.5	Reply brief editing and research (5.5); deposition outline (2.8); virtual meeting with Joe Vance, Edward Decker, and Ben Shattuck re discovery motions and upcoming depositions (.2)
11/15/22	L. Peterson	2.8	Research information relating to documents cited in Pacific Premier Bank's opposition to motion for protective order (.8); draft email to Tom Whatley and email to Joe Vance for review (.5); telephone call with Edward Decker re potentially privileged documents (.2); review email from Paul Artley (.2); communications with Joe Vance re processing of data and search terms (.4); communications with Zach Larmer re processing data and re Lincoln System data (.5); emails with Hannah Schmidt re Lincoln System data (.2)
11/15/22	B. Shattuck	6.3	Draft reply to Pacific Premier Bank's opposition to motion for protective order re deposition (6.1); virtual meeting with Joe Vance, Edward Decker, and Lorien Giles re discovery motions and upcoming depositions (.2)
11/15/22	J. Vance	5.0	Revise and edit reply briefs in support of motions for protective order (1.5); communications with Lisa Peterson re processing of data and search terms (.4); analyze issues for trial (2.1); prepare for depositions (1.0)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/16/22	E. Decker	3.1	Virtual meeting with Joe Vance re motions for protective order and Riverview Bank depositions (.3); virtual meeting with Lorien Giles re Riverview Bank depositions (.4); prepare for Riverview Bank depositions (2.4)
11/16/22	D. Foraker	1.5	Edit and revise draft of reply in support of motion for protective order
11/16/22	L. Giles	5.9	Revise replies in support of motions for protective order (1.6); legal research (1.3); virtual meeting with Edward Decker re Riverview Bank depositions (.4); prepare for Teresa Nagel deposition (2.6)
11/16/22	H. Harmon	0.8	Assist with finalization of replies in support of motions for protective order and prepare for electronic filing and distribution (.3); assist with preparation of attorney working notebook of potential deposition exhibits for Teresa Nagel deposition and copies for court reporter, witness, and attorneys in attendance at deposition (.5)
11/16/22	L. Peterson	2.9	Review October invoice from Streamline Imaging (.1); email to Streamline Imaging re changes to database user access (.1); further review of emails and update search term lists of SEC/Peter Hawkes terms (.6); run additional search terms against Pacific Premier Bank's October 2022 search term hits email database and segregate results (1.1); emails with Hannah Schmidt and Zachary Larmer re Lincoln Data system (.1); email to Zachary Larmer with search term lists and instructions for applying search terms to data unpacked from hard drive (.7); emails with Lorien Giles re Riverview Bank documents (.2)
11/16/22	B. Shattuck	0.5	Edit reply in support of motion for protective order
11/16/22	J. Vance	3.5	Revise and edit reply briefs (2.5); virtual meeting with Edward Decker (.3); telephone call with Hannah Schmidt re discovery (.2); prepare for depositions (.5)
11/17/22	E. Decker	5.3	Prepare for and take deposition of Teresa Nagel (5.0); prepare for Michael Roberts deposition (.3)
11/17/22	D. Foraker	0.3	Email with Clyde Hamstreet and Hannah Schmidt re strategy meeting scheduling and related emails

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/17/22	L. Giles	5.2	Compile additional exhibits for Teresa Nagel deposition (1.1); revise deposition outline for Michael Roberts deposition (4.1)
11/17/22	L. Peterson	2.6	Review email from Hannah Schmidt with draft spreadsheet, prepare ShareFile for same, and email link to experts (.2); emails with Joe Vance re Pacific Premier Bank organization charts and emails (.1); review and analyze documents for references to specific individuals (2.3)
11/17/22	T. Sand	0.2	Emails with Clyde Hamstreet and Hannah Schmidt re strategy meeting scheduling (.1); email opposing counsel re discovery issues (.1)
11/17/22	B. Shattuck	3.3	Legal research re aiding and abetting liability issues (2.1); research case law re damages issues (1.2)
11/17/22	J. Vance	6.5	Attend deposition of Teresa Nagel (3.5); prepare for oral argument on discovery motions (2.0); prepare for depositions (1.0)
11/18/22	E. Decker	5.7	Prepare for and take deposition of Michael Roberts
11/18/22	D. Foraker	0.2	Emails to Clyde Hamstreet, Hannah Schmidt, Tom Sand, and Joe Vance re meeting scheduling confirmation and send calendar invite for virtual meeting
11/18/22	L. Giles	1.7	Compile exhibits for Michael Roberts deposition
11/18/22	H. Harmon	0.9	Assist with preparation of attorney working notebook of potential deposition exhibits for Michael Roberts deposition and copies for court reporter, witness, and attorneys in attendance at deposition (.5); conduct location search on Tori Cox and Tori Cox Consulting, LLC (.4)
11/18/22	L. Peterson	1.6	Prepare organization charts
11/18/22	T. Sand	0.4	Email court clerk and counsel re hearing (.2); plan client strategy meeting (.2)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/18/22	B. Shattuck	1.9	Research case law re damages issues and prepare research memorandum
11/18/22	J. Vance	5.5	Attend Michael Roberts deposition (2.3); prepare for oral argument on discovery motions (1.5); interview potential witness (.5); prepare for depositions (1.2)
11/21/22	E. Decker	1.6	Analyze privilege issues relating to AEI documents
11/21/22	D. Foraker	0.3	Emails with Tom Sand, Edward Decker, and Joe Vance re preparation for 11/23 client case strategy meeting (.2); review email from Joe Vance re court rulings on discovery motions and related emails (.1)
11/21/22	H. Harmon	0.1	Submit order for DVD recording of hearing before Judge Gregerson on motions for protective order
11/21/22	L. Peterson	2.0	Continue to review, analyze, and organize emails re Tami Nesburg (1.6); telephone calls with Scott Larmer re data searches and ingestion (.4)
11/21/22	J. Vance	4.0	Prepare for and attend hearing on discovery motions
11/22/22	E. Decker	1.0	Virtual meeting with David Foraker and Tom Sand re preparation for client case strategy meeting (.5); virtual meeting with Tom Sand, Lorien Giles, and Ben Shattuck re depositions and document discovery projects (.3); draft proposed order on discovery motions (.2)
11/22/22	D. Foraker	0.8	Virtual meeting with Tom Sand and Edward Decker re preparation for client case strategy meeting
11/22/22	L. Giles	4.2	Virtual meeting with Edward Decker, Tom Sand, and Ben Shattuck re depositions and document discovery projects (.3); prepare deposition outlines and case timeline (3.9)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/22/22	L. Peterson	3.5	Emails with Michael Ueltzen re document access (.1); review and respond to email from Edward Decker re privilege review (.1); continue to review and analyze documents that hit on Pacific Premier Bank's October 2022 search terms for privilege (2.4); review email from Hannah Schmidt with SEC settlement documents (.1); review files for certain declarations of Michael Ueltzen (.5); update ShareFile and email links to Michael Ueltzen and Paul Artley (.3)
11/22/22	T. Sand	2.6	Review documents and deposition testimony (1.5); virtual meeting with Edward Decker, Lorien Giles, and Ben Shattuck re depositions and document discovery projects (.3); virtual meeting with David Foraker and Edward Decker re preparation for client case strategy meeting (.8)
11/22/22	B. Shattuck	4.6	Legal research aiding and abetting liability issues (4.3); virtual meeting with Edward Decker, Tom Sand, and Lorien Giles re depositions and document discovery projects (.3)
11/23/22	E. Decker	3.5	Series of emails with litigation team re preparation for client meeting (.6); prepare for and attend virtual client meeting re case strategy and update (.8); telephone call with Lisa Peterson re review of newly collected data, database management issues, and privilege review issues (.6); analyze potentially privileged emails (1.5)
11/23/22	D. Foraker	1.0	Series of emails with litigation team re client meeting preparation (.4); virtual meeting with Clyde Hamstreet, Hannah Schmidt, Tom Sand, Joe Vance, and Edward Decker re litigation strategy and update (.6)
11/23/22	L. Peterson	4.9	Continue to review and analyze documents that hit on Pacific Premier Bank's October 2022 search terms for privilege (2.4); emails with Hannah Schmidt re updated spreadsheet, update expert ShareFile, and email link to Michael Ueltzen and Paul Artley (.2); telephone call with Edward Decker re review of newly collected data, database management issues, and privilege review issues (.6); continue to review and analyze emails in email database re Tami Nesburg and Tori Cox, compile same, and email to Joe Vance (1.7)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/23/22	T. Sand	2.0	Email litigation team re preparation for client meeting (.2); prepare for and attend virtual client meeting re case strategy and update (.9); work on strategic litigation and trial plan (.9)
11/23/22	J. Vance	1.5	Series of emails with litigation team re preparation for client meeting (.4); prepare for and attend virtual client meeting re case strategy and update (1.1)
11/28/22	E. Decker	2.2	View hearing on discovery motions (.4); revise draft proposed order on discovery motions (.5); virtual meeting with investors' counsel, David Foraker, and Joe Vance re litigation update (.5); analyze AEI documents to be produced in response to Pacific Premier Bank requests (.8)
11/28/22	D. Foraker	0.5	Virtual meeting with Chris Kayser, John Stephens, Bridget Donegan, Jon Hunt, Edward Decker, and Joe Vance re litigation update
11/28/22	L. Giles	4.1	Draft deposition outlines and case overview
11/28/22	H. Harmon	0.3	Obtain copy of November 21, 2022, hearing DVD and prepare for attorney review
11/28/22	L. Peterson	2.2	Continue to review, analyze, and compile documents re Tami Nesburg and Tori Cox
11/28/22	T. Sand	1.0	View hearing on discovery motions (.5); analyze strategy for David Foraker deposition and related emails (.5)
11/28/22	B. Shattuck	3.5	View hearing on discovery motions (.5); draft proposed order on discovery motions (1.0); legal research aiding and abetting liability issues (2.0)
11/28/22	J. Vance	3.5	Virtual meeting with investors' counsel, David Foraker, and Edward Decker re litigation update (.5); exchange emails with other parties re depositions scheduling (.4); exchange communications with Clyde Hamstreet re deposition (.4); analyze issues for trial and depositions (2.2)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/29/22	E. Decker	2.7	Virtual meeting with Tom Sand, Joe Vance, Lorien Giles, and Ben Shattuck re discovery projects, deposition preparation, and case strategy (.5); virtual meeting with Lisa Peterson re data processing, document review projects, and upcoming productions (.3); analyze AEI documents slated for production to bank defendants (1.9)
11/29/22	L. Giles	6.3	Draft deposition outlines and review potential exhibits (5.8); virtual meeting with Tom Sand, Joe Vance, Edward Decker, and Ben Shattuck re discovery projects, deposition preparation, and case strategy (.5)
11/29/22	L. Peterson	0.8	Email and analyze email from Zachary Larmer with search hit reports on processed data (.2); telephone call with Zachary Larmer re reports on processed data and data on Lincoln System drive (.3); virtual meeting with Edward Decker re data processing, document review projects, and upcoming productions (.3)
11/29/22	T. Sand	0.6	Virtual meeting with Joe Vance, Edward Decker, Lorien Giles, and Ben Shattuck re discovery projects, deposition preparation, and case strategy (.5); email re depositions (.1)
11/29/22	B. Shattuck	3.3	Virtual meeting with Tom Sand, Joe Vance, Edward Decker, and Loren Giles re discovery projects, deposition preparation, and case strategy (.5); legal research re aiding and abetting liability issues (2.8)
11/29/22	J. Vance	1.5	Virtual meeting with Tom Sand, Edward Decker, Lorien Giles, and Ben Shatuck re discovery projects, deposition preparation, and case strategy (.5); exchange communications with Pacific Premier Bank attorney re protective order (.3); analyze and outline issues for depositions and trial (.7)
11/30/22	E. Decker	1.8	Analyze documents to be produced to Pacific Premier Bank (1.7); telephone call with Lisa Peterson re production of AEI documents to Pacific Premier Bank (.1)
11/30/22	L. Giles	3.1	30(b)(6) deposition outline and exhibit review

December 5, 2022

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
11/30/22	H. Harmon	0.3	Prepare chronology of Regents and Grandpoint credit memos for AEI and AEMM for attorney review
11/30/22	L. Peterson	2.1	Emails with Zachary Larmer re processing reports on emails and loose files from hard drive (.2); telephone call with Edward Decker re production of AEI document to Pacific Premier Bank (.1); continue to review emails for production from email database and prepare instructions to litigation support team to run production (1.6); update document index (.2)
11/30/22	T. Sand	0.3	Review chronology of key events (.2); email counsel re discovery and deposition schedule (.1)
11/30/22	B. Shattuck	3.3	Research case law on theory of collective corporate knowledge and prepare research memorandum
11/30/22	J. Vance	5.6	Exchange communications with defendants' counsel re discovery (.3); outline issues for depositions (5.3)

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
T. Sand	Partner	17.7	\$825	\$14,602.50
D. Foraker	Partner	7.1	630	4,473.00
J. Knapp	Partner	0.2	595	119.00
J. Vance	Partner	75.1	550	41,305.00
E. Decker	Partner	80.7	475	38,332.50
L. Giles	Associate	83.9	380	31,882.00
B. Shattuck	Associate	75.9	350	26,565.00
C. McCoy	Paralegal	6.4	280	1,792.00
L. Peterson	Paralegal	49.6	280	13,888.00
H. Harmon	Paralegal	5.0	225	1,125.00
Summary Total:		401.6		\$174,084.00

Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Naegeli Deposition and Trial: Original deposition transcript with video for Greg Usselman	2,950.75
Naegeli Deposition and Trial: Original deposition transcript with video for Greg Usselman	2,043.72
Streamline Imaging: Relativity data storage	16,203.74
Streamline Imaging: Hamstreet - AEI Relativity database	19,375.00
Disbursement Total:	\$40,573.21

Invoice Summary

Professional Fees Through November 30, 2022	\$174,084.00
Disbursements	<u>\$40,573.21</u>
Amount Due - Current Period:	<u>\$214,657.21</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: 2198983
December 5, 2022

Invoice Summary

Professional Fees Through November 30, 2022	\$2,209.50
Disbursements	\$0.00
Amount Due – Current Period:	<u>\$2,209.50</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>
11/02/22	J. Knapp	1.1	Emails with Hannah Schmidt re settlement notice for class action and Beattie action (.5); emails with John Rake re signed class supplemental agreement (.2); continue drafting settlement notice (.4)
11/04/22	J. Knapp	0.6	Finalize notice of class and Beattie settlement (.2); emails with Naureen Khan re transmittal of notice of class and Beattie settlement for posting to website (.2); emails with Hannah Schmidt and counsel to class, Beattie, and Davis Wright Tremain re settlement notice (.2)
11/15/22	J. Knapp	0.4	Emails with John Rake re fully executed class supplemental settlement agreement (.2); review fully-executed class supplemental settlement agreement (.1); emails with Hannah Schmidt re same (.1)
11/21/22	H. Harmon	0.2	Coordinate ex parte presentation of motion to approve receiver's proposed settlements with class action and Beattie plaintiffs
11/21/22	J. Knapp	1.1	Draft ex parte motion papers for approval of settlements with Davis Wright Tremaine and class action and Beattie plaintiffs
11/22/22	H. Harmon	0.1	Obtain conformed copies of motion to approve receiver's proposed settlements with class action and Beattie plaintiffs
11/22/22	J. Knapp	0.2	Emails with John Rake and other counsel re approval of class, Beattie, and Davis Wright Tremaine settlements by Superior Court
11/23/22	J. Knapp	0.2	Email communications with John Stephens re approval of class, Beattie, and Davis Wright Tremaine settlements

Account: 721921

Invoice: 2198983

December 5, 2022

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
J. Knapp	Partner	3.6	\$595	\$2,142.00
H. Harmon	Paralegal	0.3	225	67.50
Summary Total:		3.9		\$2,209.50

Invoice Summary

Professional Fees Through November 30, 2022	\$2,209.50
Disbursements	<u>\$0.00</u>
Amount Due - Current Period:	<u>\$2,209.50</u>

EXHIBIT C



SPECIALIZED
FORENSIC
INVESTIGATIONS

Invoice

Specialized Forensic Investigations LLC

5701 Lonetree Blvd., Suite 212
Rocklin, CA 95765

Invoice Date:	Invoice #:
12/4/2022	1722

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
1/4/2023	Hamstreet & Associates	

Date	Description	Hours	Rate	Amount
11/14/2022	Investigation Research and review information relative to SAR process	1.2	300.00	360.00
11/14/2022	Phone call Preparation for and call with Hamstreet and Ueltzen	0.9	300.00	270.00
11/15/2022	Phone call Preparation for and call with Hamstreet and Ueltzen	0.6	300.00	180.00
11/15/2022	Phone call Calls and emails with Hamstreet and attorneys regarding computer forensics	0.8	300.00	240.00
11/21/2022	Investigation Review and analyze spreadsheet of AEM Pool Balance and Recovery	1	300.00	300.00
11/21/2022	Phone call Preparation for and call with Hamstreet and Ueltzen	1.1	300.00	330.00
11/25/2022	Investigation Review and analyze spreadsheet of AEM Pool Balance and Recovery	0.3	300.00	90.00

Thank you for your business.	Total	\$1,770.00
	Payments/Credits	\$0.00
	Balance Due	\$1,770.00

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
November 2022 Services

Date	Description	Person	Hours	Rate	Amount
11/1/2022	Real estate research	MU	0.3	450.00	\$ 135.00
11/14/2022	Accounting team call and related prep	MU	1.3	450.00	585.00
11/15/2022	Call accounting team and related prep	MU	0.7	450.00	315.00
11/21/2022	Expert report	MU	3.4	450.00	1,530.00
11/22/2022	Download and review accounting materials	MU	2.8	450.00	1,260.00
11/26/2022	Outline report and drafting	MU	2.6	450.00	1,170.00
11/28/2022	Expert report	MU	4.3	450.00	1,935.00
11/29/2022	Expert report	MU	2.8	450.00	<u>1,260.00</u>
	Total Fees				<u>\$ 8,190.00</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	14771
Date	11/30/22
Job Number	AEM-003
PO#	--
Charge#	--

Job Name: Microsite Updates & Maintenance

Agency Contact Brian Gard

Description: For Professional Services Rendered Through November, 2022:

Description	Hours Billed	Amount
Account Services	2.25	\$375.00
Professional Services Subtotal:	2.25	\$375.00
TOTAL:	2.25	\$375.00

PAYMENT TERMS: net 30 days

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
11/30/2022	22495
Terms	Service Through
	11/30/2022

In Reference To: EAST CAPE G&A (Legal fees)					
Date	By	Services	Hours	Rates	Amount
11/03/2022	DV	weekly development team call	0.40	\$ 50.00/hr	\$ 20.00
11/30/2022	BR	Meeting: attny Abril re: Mar de Plata contracts and closings. Review missing documentation. Follow up Notary re: recording of Trust Deed.	1.00	\$ 350.00/hr	\$ 350.00

Total Hours 1.40 hrs
Total Legal fees \$ 370.00
Total Amount \$ 370.00

In Reference To: General (Legal fees)					
Date	By	Services	Hours	Rates	Amount
11/07/2022	IM	email to Mr. Tremayne re. release mortgage; discuss wLaura re. same and next steps	0.20	\$ 130.00/hr	\$ 26.00
11/07/2022	BR	Communications: Gossler re: NDA; review and execute same.	0.25	\$ 350.00/hr	\$ 87.50
11/08/2022	DV	Filling KYCs and coordinating execution.	0.50	\$ 100.00/hr	\$ 50.00
11/09/2022	DV	Closing and post closing coordination (filling KYCs, sending Invoice receipts, drafting Commission Agreements)	1.50	\$ 100.00/hr	\$ 150.00
11/14/2022	DV	Condo E2 closing: review escrow and commission agreement	0.70	\$ 100.00/hr	\$ 70.00
11/14/2022	BR	Communications: all parties re: Tamar and Condo E2 closings.	0.35	\$ 350.00/hr	\$ 122.50

11/15/2022	BR	Communications: Daniela, counterparts re: Condo E2 and Tamar pending closings.	0.25	\$ 350.00/hr	\$ 87.50
11/16/2022	BR	Follow up: communications Gossler and Kreston firms re: audit/advisory proposals. Review proposal, fill out and send forms.	0.40	\$ 350.00/hr	\$ 140.00
11/17/2022	BR	Procure and execute Condo E-2 closing with Daniela, notary, Buyer's rep. Review and comment on docs and warranty deed revision.	1.30	\$ 350.00/hr	\$ 455.00
11/17/2022	BR	Complete Gossler audit forms. Communications Sal and Gossler. Review and respond to emails.	0.40	\$ 350.00/hr	\$ 140.00
11/24/2022	DV	Condo E2 - Post closing follow up	0.50	\$ 100.00/hr	\$ 50.00
11/30/2022	BR	Local Management & Banking Support (AEMEMMX S DE RL DE CV) Nov, 2022	Flat Fee	\$ 220.00	\$ 220.00
11/30/2022	DV	Training session with Abril	0.90	\$ 100.00/hr	\$ 90.00

Total Hours 7.25 hrs
Total Legal fees \$ 1,688.50
Total Amount \$ 1,688.50

In Reference To: Incorporation (Legal fees)					
Date	By	Services	Hours	Rates	Amount
11/08/2022	IM	Discuss wBaeza re. RNIE status and next steps; review of inv law	0.15	\$ 130.00/hr	\$ 19.50

Total Hours 0.15 hrs
Total Legal fees \$ 19.50
Total Amount \$ 19.50

In Reference To: Mar de Plata Consumer Docs & Dev Legal (Legal fees)					
Date	By	Services	Hours	Rates	Amount
11/03/2022	IM	Discussions wLaura re. next steps, negotiate fees for Public Notary and appraiser; review of ongoing sales, prep GFCE, request quotes, etc.	0.65	\$ 130.00/hr	\$ 84.50
11/14/2022	IM	Review of promise to trust, payment terms, promissory note, closing date, financial option; discussions wLaura on closing process; prep email to Cristina Montoya wAnswers	1.25	\$ 130.00/hr	\$ 162.50
11/15/2022	IM	internal re. MIA Mar de Plata	0.15	\$ 130.00/hr	\$ 19.50
11/29/2022	IM	Internal meeting re. ongoing sales; reiew of PTT, review of files and discuss wAttny Abril on same	1.00	\$ 130.00/hr	\$ 130.00

Total Hours 3.05 hrs
Total Legal fees \$ 396.50

Total Amount **\$ 396.50**

In Reference To: Title Investigation (Legal fees)

Date	By	Services	Hours	Rates	Amount
11/08/2022	DV	Tamar 201 - post closing follow up	0.30	\$ 0.00/hr	No Charge

Total Hours 0.30 hrs

Total Amount **\$ 0.00**

Total Hours	12.15 hrs
Total Legal fees	\$ 2,474.50
Total Invoice Amount	\$ 2,474.50

Notes:

Thank you in advance for your prompt payment.

EXHIBIT G

**CROWLEY
FLECK** PLLP
ATTORNEYS

Invoice Date: December 07, 2022
 Invoice Number: 990149
 Matter Number: 111059 - 000001 Atty: GS2
 RE: Shannon Foreclosure
 Judicial Mortgage Foreclosure (Lincoln County)

Clyde A. Hamstreet & Associates, LLC
 Attn: John R. Knapp, Jr.
 Miller Nash Graham & Dunn LLP
 2801 Alaskan Way, Suite 300
 Seattle, WA 98121

Current Services	\$2,124.00
Current Disbursements	\$0.00
Current Balance Due	\$2,124.00

Amount Remitted \$ _____

PLEASE REMIT TO: P.O. Box 30441 Billings, MT 59107

Please return this top portion with payment

PROFESSIONAL SERVICES

Date	Person	Description	Hours	Amount
11/11/2022	GS2	Research legal description exception dispute with title agent.	0.90	\$265.50
11/14/2022	GS2	Investigate legal description issue with title agent and title agent's counsel.	0.70	\$206.50
11/16/2022	GS2	Additional research regarding legal description; attempt review of chain of title; exchange correspondence with title agent; conferences with surveyor candidates; conference with counsel for title agent; review legal requirements for retracement survey.	2.20	\$649.00
11/21/2022	GS2	Conferences with surveyors regarding retracement survey.	0.30	\$88.50
11/22/2022	GS2	Prepare package for surveyors.	0.80	\$236.00
11/23/2022	GS2	Conferences with surveyors regarding retracement.	0.30	\$88.50
11/25/2022	GS2	Review chain of title history from agent for surveyor.	0.90	\$265.50
11/28/2022	GS2	Conferences with surveyors regarding retracement assignment.	0.30	\$88.50
11/29/2022	GS2	Exchange correspondence with surveyor candidates.	0.40	\$118.00
11/29/2022	GS2	Review chain of title.	0.40	\$118.00
Total Professional Services			7.20	\$2,124.00
Total Due Current Invoice				\$2,124.00

Payment in full is due upon receipt of this statement. Interest charges may be assessed on accounts delinquent more than 60 days.
 Crowley Fleck PLLP | Tax ID No 81-0122795 | Make Payment at www.crowleyfleck.com | 406-255-7207