

Honorable David E. Gregerson

E-FILED
01-13-2023, 10:30
Scott G. Weber, Clerk
Clark County

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SUPERIOR COURT OF WASHINGTON FOR CLARK COUNTY

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In re:

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Case No. 19-2-01458-06

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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 (NOVEMBER AND DECEMBER 2022)

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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;

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AND TO: Parties requesting special notice.

1 Clyde A. Hamstreet & Associates, LLC, the duly appointed general receiver herein (the
2 “Receiver”), submits the Receiver’s Notice of Intent to Compensate (November and December
3 2022) in accordance with Paragraph 11 of the Order Appointing General Receiver dated May 10,
4 2019 (the “Receivership Order”), which provides in part: “The Receiver and the Receiver’s
5 authorized attorneys and other professionals may request to be compensated on an interim or
6 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 and December 2022. For this period, the
15 Receiver requests final approval of its compensation in the amount of \$44,895.00 and
16 reimbursement of no costs, for a total payment of \$44,895.00.

17 Attached as Exhibit B hereto is a true and correct copy of the time and expense summary
18 of the Receiver’s authorized attorneys, Miller Nash LLP, for services and costs in December
19 2022. For this period, such attorneys request final approval of their compensation in the amount
20 of \$142,674.50 and reimbursement of costs of \$2,386.30, for a total payment of \$145,060.80.

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 December 2022. For this period, such forensic accountants request final
24 approval of their compensation in the amount of \$1,410.00 and reimbursement of no costs, for a
25 total payment of \$1,410.00.
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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 December 2022. For this period, such forensic accountant requests final approval of his
4 compensation in the amount of \$18,675.00 and reimbursement of no costs, for a total payment of
5 \$18,675.00.

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 December 2022. For this period, such consultants request final approval of
9 their compensation in the amount of \$130.00 and reimbursement of no costs, for a total payment
10 of \$130.00.

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 Montana foreclosure counsel, Crowley Fleck PLLP, for
13 services and costs in December 2022. For this period, such attorneys request final approval of
14 their compensation in the amount of \$2,360.00 and reimbursement of no costs, for a total
15 payment of \$2,360.00.

16 Unless objections to the foregoing requests are filed with the Court and served on the
17 undersigned attorneys so as to be received by January 27, 2023, the Receiver may make the
18 payments requested herein and/or the professionals may apply their retainers, if any.

19 DATED this 13th day of January, 2023.

20 MILLER NASH LLP

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

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

January 10, 2023

Invoice # 2586

Professional Services

			<u>Hours</u>	<u>Amount</u>
11/11/2022	HS	Receivership Duties Pick up Lincoln hard drive from streamline and take it to Colby.	0.20	100.00
12/1/2022	MC	Litigation Support Work on data for Mike Ueltzen.	1.50	225.00
	CAH	Litigation Support Conference call with Maren Cohn regarding litigation. Work on scheduling.	0.60	360.00
	HS	Litigation Support Call with Mike Ueltzen and follow up email to Martha Cohn regarding data requests.	0.60	300.00
12/2/2022	MC	Litigation Support Work on data for Mike Ueltzen.	2.00	300.00
12/5/2022	MC	Receivership Duties Calls from investors about address changes, about transferring claims.	0.90	135.00
	MC	Litigation Support Add finishing changes and formatting on new damages calculations schedule.	4.10	615.00
12/6/2022	MC	Receivership Duties Create transfer claims tracker, update and prepare schedules for distribution checks, confirm mailings and account ownership with investors.	4.20	630.00
12/7/2022	MC	Receivership Duties Continue setting up transfer claims tracker; call from investor regarding account and related communications. Update payment histories and data tape.	3.10	465.00
	HS	Receivership Duties Emails regarding Mar de Plata.	0.30	150.00

			<u>Hours</u>	<u>Amount</u>
12/8/2022	MC	Receivership Duties Communications regarding claim transfers and investor information to prepare for distribution. Call to IRA custodians.	2.80	420.00
	CAH	Litigation Support Correspondence back and forth regarding deposition timing.	0.30	180.00
	HS	Litigation Support Call with Cliff Hackney regarding Lincoln Data production.	0.30	150.00
	HS	Litigation Support Call with Mike Ueltzen and Paul Artley regarding damages.	1.00	500.00
	HS	Receivership Duties Read and respond to emails. Discuss with Martha Cohn regarding 2nd distribution.	0.80	400.00
12/9/2022	MC	Receivership Duties Phone calls with borrower and Evergreen. Set up Evergreen reconciliation. Go to post office.	1.70	255.00
	HS	Litigation Support Call with Mike Ueltzen regarding damages. Follow up regarding same.	0.20	100.00
	HS	Receivership Duties Calls and emails regarding real estate.	0.40	200.00
	HS	Pacific Premier Bank Research and respond to interrogatories.	2.00	1,000.00
	HS	Pacific Premier Bank Prepare for and call with Joe Vance regarding interrogatories.	1.50	750.00
12/12/2022	MC	Receivership Duties Write distribution letters; get fully organized to print checks.	3.20	480.00
	CAH	Receivership Duties Work on scheduling and coordination of deposition preparations.	0.30	180.00
	HS	Litigation Support Call with class action team.	0.40	200.00
	HS	Pacific Premier Bank Research and respond to interrogatories.	3.00	1,500.00
12/13/2022	MC	Litigation Support Work on money on spreadsheet; cross-reference claim transfers.	2.70	405.00
	CAH	Litigation Support Meet with Joe Vance regarding deposition preparation.	2.10	1,260.00
	HS	Receivership Duties Call with Jim Hart regarding escrow at MDP. Follow up email to Ben Rosen.	0.40	200.00

		<u>Hours</u>	<u>Amount</u>
12/13/2022	HS Litigation Support Review draft damages report. Call with Joe Vance, Mike Ueltzen, Paul Artley and Edward Decker regarding same. Follow up regarding same.	3.00	1,500.00
12/14/2022	MC Receivership Duties Process mail and checks, print and prepare packages for check mailing.	1.50	225.00
	MC Litigation Support Money in spreadsheet.	2.20	330.00
	HS Pacific Premier Bank Respond to interrogatories. Call with Joe Vance regarding same.	2.00	1,000.00
	HS Receivership Duties Emails regarding Mar de Plata. Sign distribution checks.	1.00	500.00
12/15/2022	MC Receivership Duties Print, organize, mail distribution checks. Special assets call with Jesus Palomares.	6.70	1,005.00
	HS Pacific Premier Bank Respond to interrogatories. Call with Joe Vance regarding same.	3.00	1,500.00
12/16/2022	MC Receivership Duties Respond to investors, call about borrower question on title company.	1.00	150.00
	MC Litigation Support Continue work on money in spreadsheet.	3.10	465.00
	HS Pacific Premier Bank Research and respond to interrogatories.	2.00	1,000.00
12/19/2022	MC Receivership Duties Calls from investor regarding distribution and class action.	0.50	75.00
	MC Litigation Support Money in spreadsheet.	2.90	435.00
	HS Litigation Support Participate in the Schwartz deposition.	8.50	4,250.00
12/20/2022	MC Litigation Support Continue work on money in spreadsheet.	4.40	660.00
	MC Litigation Support Compile and organize information for interrogatory responses.	1.20	180.00
	HS Pacific Premier Bank Research interrogatories. Call with Joe Vance regarding same.	6.00	3,000.00
12/21/2022	MC Receivership Duties Evergreen reconciliation; talk to investors and to Pacific Premier Trust about distribution.	3.90	585.00

			<u>Hours</u>	<u>Amount</u>
12/21/2022	MC	Receivership Duties Run contract details. Respond to investors.	0.70	105.00
	HS	Litigation Support Review draft damage report.	0.30	150.00
	HS	Pacific Premier Bank Research interrogatories. Email to Joe Vance regarding same.	4.80	2,400.00
12/22/2022	CAH	Receivership Duties Review and approve wire transfers.	0.30	180.00
	MC	Litigation Support Money in spreadsheet.	2.00	300.00
	HS	Litigation Support Review draft of damage report and money in schedule.	0.70	350.00
	HS	Litigation Support Call with Edward Decker and Joe Vance regarding interrogatories, 30(b)(6) and deposition schedule. Follow up work on interrogatory documentation.	4.50	2,250.00
12/23/2022	MC	Receivership Duties Enter checks.	0.60	90.00
	MC	Litigation Support Revise spreadsheet, research interrogatory information.	3.00	450.00
	HS	Litigation Support Continue work on interrogatory responses.	5.10	2,550.00
12/27/2022	HS	Litigation Support Review draft of damages report.	2.00	1,000.00
	HS	Pacific Premier Bank Continue work on interrogatory responses.	3.00	1,500.00
12/28/2022	MC	Receivership Duties Open and catalogue mail, answer investor calls/voicemail from holiday weekend; contact escrow company; enter and print checks.	2.50	375.00
	MC	Litigation Support Research information for interrogatories.	1.80	270.00
	HS	Litigation Support Prepare for 30(b)(6) depositions.	4.00	2,000.00
12/29/2022	MC	Litigation Support Login and orientation to relativity database. Format and edit information for interrogatory topics.	2.40	360.00

		<u>Hours</u>	<u>Amount</u>
12/29/2022	MC Receivership Duties Review investor claim amounts and information. Phone conversation with investors.	1.30	195.00
	HS Litigation Support Call with Joe Vance, Edward Decker, Paul Artley and Mike Ueltzen regarding Damage report. Follow up work regarding same.	0.90	450.00
12/30/2022	MC Litigation Support Review Damage report. Sift through relativity documents. Review PPMs. Research for interrogatories and 30(b)(6) topics.	4.00	600.00
	HS Litigation Support Prepare for 30(b)(6) depositions and review Damage report.	2.00	1,000.00
	For professional services rendered	<u>139.40</u>	<u>\$44,895.00</u>
	Accounts receivable transactions		
1/4/2023	Payment invoice #2582 - Thank You. Check No. 1667		(\$37,187.50)
	Total payments and adjustments		<u>(\$37,187.50)</u>
	Balance due		<u><u>\$44,895.00</u></u>

Consultant Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Clyde A. Hamstreet - Principal	3.60	600.00	\$2,160.00
Hannah Schmidt - Consultant	63.90	500.00	\$31,950.00
Martha Cohn - Jr. Consultant	71.90	150.00	\$10,785.00

EXHIBIT B

Client.Matter	Description	Bill Amt	Fees	Costs	Bill Num
721921.0001	American Eagle Mortgage Investment Funds	\$6,976.00	\$6,916.00	\$60.00	2201005
721921.0017	Adjunct Litigation Claims Against Ross Miles, Maureen Wile, et al.	\$138,084.80	\$135,758.50	\$2,326.30	2201001
		\$145,060.80	\$142,674.50	\$2,386.30	



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: 2201005
January 6, 2023

Invoice Summary

Professional Fees Through December 31, 2022	\$6,916.00
Disbursements	<u>\$60.00</u>
Amount Due – Current Period:	<u>\$6,976.00</u>

To pay by wire transfer, route to:

Miller Nash LLP, U.S. Bank National Association
Account # 1536-0646-7352, Routing # 123000220,
Swift Code USBKUS44IMT
Bank address: 321 SW 6th Avenue, Portland, OR 97204

To pay by credit card, use this link:

<https://secure.lawpay.com/pages/millernash/operating>

To pay by check, remit to:

PO Box 3585
Portland, OR 97208-3585

Accounts due and payable in U.S. dollars upon receipt. Please include invoice number with remittance.
Invoice may not include all fees and expenses incurred prior to statement closing date. Late charges of .75% per month (9% annually) will accrue on all amounts unpaid after 30 days from date of invoice. Tax ID # 93-0410518.

January 6, 2023

Invoice Detail

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/01/22	J. Knapp	0.6	Emails with Greg Schultz and Ken Jenkins re Montana property survey (.2); emails with Hannah Schmidt and Brenna Dickey re annual renewals for AEM 300, AEM I, and AEM Short Term (.2); draft notice of intent to compensate (November 2022) (.2)
12/02/22	J. Knapp	1.6	Prepare for hearing on motion to reduce claims (.6); attend hearing on motion to reduce claims (.8); email communications with Hannah Schmidt and Clyde Hamstreet re report on hearing (.2)
12/04/22	B. Dickey	0.2	Review Washington Secretary of State records re and confirm with Hannah Schmidt re filing of Washington annual reports for American Eagle Mortgage 300, LLC, American Eagle Mortgage I, LLC, and American Eagle Mortgage Short Term, LLC
12/05/22	J. Knapp	1.0	Continue drafting notice of intent to compensate (November 2022) (.8); emails with professionals re notice of intent to compensate (November 2022) (.2)
12/06/22	J. Knapp	0.8	Emails with Paul Artley and Rosen Law re notice of intent to compensate (November 2022) (.4); continue drafting notice of intent to compensate (November 2022) (.4)
12/07/22	J. Knapp	0.2	Emails with Teri Yamauchi re notice of intent to compensate (November 2022)
12/08/22	J. Knapp	2.2	Emails with Martha Cohn and review documents re investor claim issues (1.6); continue drafting notice of intent to compensate (November 2022) (.4); emails with Veronica Hamstreet re notice of intent to compensate (November 2022) (.2)

January 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/09/22	J. Knapp	1.4	Emails with Veronica Hamstreet re notice of intent to compensate (November 2022) (.2); finalize notice of intent to compensate (November 2022) (.8); emails with Naureen Khan re transmittal of notice of intent to compensate (November 2022) and order granting motion to reduce claims for posting to website (.2); emails with Hannah Schmidt re entered order granting motion to reduce claims (.2)
12/12/22	J. Knapp	0.2	Email communications with Hannah Schmidt re McQuhae settlement status
12/13/22	J. Knapp	0.8	Emails with Hannah Schmidt re McQuhae settlement agreement implementation (.5); review McQuhae settlement agreement and title report (.3)
12/14/22	J. Knapp	0.3	Review tax notice re Tucumcari, New Mexico, property and related emails with Hannah Schmidt
12/15/22	J. Knapp	0.2	Emails with Hannah Schmidt and Greg Schultz re Montana property survey and water rights update
12/15/22	J. Palomares	0.7	Emails and meeting with Martha Cohn re payment history for AEM 100 loan with Burford-Montgomery and re buyer request for accounting
12/21/22	J. Knapp	0.3	Emails with Greg Schultz, Hannah Schmidt, and Karin Bache re Montana property survey
12/23/22	J. Knapp	0.5	Review court docket and related emails with Hannah Schmidt re notice of intent to compensate (November 2022)
12/27/22	B. Dickey	0.2	Prepare and file Washington annual report of American Eagle Mortgage 100, LLC
12/27/22	J. Knapp	0.2	Emails with Brenna Dickey and Hannah Schmidt re annual report for AEM 100
12/29/22	J. Knapp	0.4	Review client files and update receivership case timeline checklist

January 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/29/22	J. Palomares	0.2	Telephone conference with Hannah Schmidt re strategy for eviction action on Nehalem, Oregon, property

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
J. Knapp	Partner	10.7	\$595	\$6,366.50
J. Palomares	Partner	0.9	475	427.50
B. Dickey	Paralegal	0.4	305	122.00
Summary Total:		12.0		\$6,916.00

Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Washington Secretary of State: American Eagle Mortgage 100, LLC annual report filing fee	60.00
Disbursement Total:	\$60.00

Invoice Summary

Professional Fees Through December 31, 2022	\$6,916.00
Disbursements	\$60.00
Amount Due - Current Period:	\$6,976.00



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

Account: 721921.0017
Adjunct Litigation Claims Against Ross Miles, Maureen Wile, et al.

Invoice: 2201001
January 6, 2023

Invoice Summary

Professional Fees Through December 31, 2022	\$135,758.50
Disbursements	<u>\$2,326.30</u>
Amount Due – Current Period:	<u>\$138,084.80</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.

January 6, 2023

Invoice Detail

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/01/22	E. Decker	0.7	Analyze draft proposed order from Pacific Premier Bank (.3); analyze interrogatory responses from Riverview Bank (.2); oversee production of emails in response to Pacific Premier's request for production (.2)
12/01/22	H. Harmon	0.5	Prepare notices of deposition for Monte Schwartz and Tami Nesburg and prepare for distribution, update case docketing, and make arrangements for conference room, court reporter, and videographer services
12/01/22	L. Peterson	1.7	Review email from Zach Larmer with link to AEI documents with hits on Hawkes privilege search terms and brief review of documents (.3); email to Joseph Vance and Edward Decker re same (.2); organize key emails re document search terms for future reference (.3); review invoice from Streamline and related emails (.4); review Hamstreet email collection 3 in database (.5)
12/01/22	B. Shattuck	6.1	Legal research and draft research memorandum
12/01/22	J. Vance	6.0	Exchange communications with opposing counsel re discovery (.4); analyze discovery responses from Riverview Bank (.5); analyze documents for depositions (3.5); outline issues for depositions and trial (1.6)
12/02/22	E. Decker	0.7	Revise draft proposed order on discovery motions (.3); analyze newly served interrogatories from Pacific Premier Bank (.4)
12/02/22	H. Harmon	0.4	Prepare standard objections for responses to Riverview Bank's second requests for production and update case docketing (.2); prepare standard objections for responses to Pacific Premier Bank's second interrogatories and update case docketing (.2)

January 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/02/22	L. Peterson	5.7	Emails with Joseph Spring re revisions to production (.5); prepare ShareFile for production of documents (.3); continue to review and analyze documents collected from Hamstreet email in database (2.2); emails with Joseph Vance re privilege issue (.1); virtual call with Edward Decker re revisions to production and preparation of documents for Peter Hawkes review (.2); emails with Zachary Larmer and Sarah Houser to request search hit report Peter Hawkes privilege terms as applied to AEI emails and loose files in database (.2); review, analyze, and compile emails re Monte Schwartz (2.1); emails with Joseph Vance re Monte Schwartz emails (.1)
12/02/22	B. Shattuck	5.7	Legal research and draft research memorandum
12/02/22	J. Vance	4.2	Analyze interrogatories from Pacific Premier Bank (.5); exchange emails with Hannah Schmidt re discovery (.5); prepare for depositions (3.2)
12/03/22	J. Vance	0.3	Email to opposing counsel re proposed order on motions for protective order
12/05/22	E. Decker	2.2	Draft chronology of key Riverview Bank events
12/05/22	L. Peterson	5.1	Review, analyze, and compile emails with Monte Schwartz at Blakemore Holdings (5.0); email to Joseph Vance re Monte Schwartz emails (.1);
12/05/22	B. Shattuck	4.9	Legal research and draft research memorandum
12/05/22	J. Vance	1.0	Virtual meeting with Matthew Kalmanson and David Foraker (.7); exchange emails with Hannah Schmidt re discovery (.3)
12/06/22	E. Decker	6.0	Virtual meeting with Joseph Vance, Tom Sand, Lorien Giles, and Ben Shattuck re document discovery, depositions, and analysis projects (.5); draft chronology of key Riverview Bank events (3.5); coordinate review and production of documents in response to Pacific Premier Bank's requests (.5); correspond with counsel for Riverview Bank re depositions (.2); analyze and revise research memorandum (1.3)

January 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/06/22	L. Giles	5.0	Virtual meeting with Tom Sand, Joseph Vance, Edward Decker, and Ben Shattuck re document discovery, depositions, and analysis projects (.5); legal research (4.5)
12/06/22	L. Peterson	4.9	Review and respond to emails from Edward Decker re document projects (.6); search production set and prepare subset for attorney review (2.0); emails with litigation support re preparation of document set for Peter Hawkes' review (.5); review Riverview Bank productions for September 2004 credit memo (.5); communications with Joseph Vance re documents to prepare for David Foraker deposition and search database for same (1.3)
12/06/22	T. Sand	2.0	Review deposition of Greg Usselman (1.5); virtual meeting with Joseph Vance, Edward Decker, Lorien Giles, and Ben Shattuck re document discovery, depositions, and analysis projects (.5)
12/06/22	B. Shattuck	2.2	Virtual meeting with Tom Sand, Joseph Vance, Edward Decker, and Lorien Giles re document discovery, depositions, and analysis projects (.5); edit research memorandum (.3); review documents for credit memos from Riverview Bank (1.4)
12/06/22	J. Vance	2.5	Virtual meeting with Tom Sand, Edward Decker, Lorien Giles, and Ben Schattuck (.5); prepare for depositions (2.0)
12/07/22	L. Peterson	2.2	Prepare documents for Peter Hawkes' review and email ShareFile link to Edward Decker (.6); continue to review and analyze documents for David Foraker deposition preparation (1.6)
12/07/22	T. Sand	0.3	Analyze case strategy and discovery issues
12/07/22	B. Shattuck	3.6	Edit and revise Rule 30(b)(6) deposition notice to Pacific Premier Bank per agreed upon stipulations between Hamstreet and Pacific Premier Bank
12/07/22	J. Vance	3.5	Exchange communications with opposing counsel re scheduling issues (.4); prepare for depositions (3.1)

January 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/08/22	E. Decker	1.2	Telephone conference with Peter Hawkes re review of potentially privileged emails (.3); emails with Peter Hawkes re review of potentially privileged emails (.2); telephone call with Lisa Peterson regarding intake, processing, and analysis of documents (.3); analyze and revise research memorandum (.4)
12/08/22	H. Harmon	0.2	Prepare deposition scheduling calendar
12/08/22	L. Peterson	4.4	Update ShareFile folder of documents for Peter Hawkes' review and email to Edward Decker with new link (.3); continue to review, analyze, and compile documents for David Foraker deposition preparation (2.8); emails with project management team at Streamline Imaging re formulation of searches (.8); call from Zach Larmer re reload of search results and email to Edward Decker re same (.2); telephone call with Edward Decker regarding intake, processing, and analysis of documents (.3)
12/08/22	B. Shattuck	1.6	Edit revised Rule 30(b)(6) deposition notice to Pacific Premier Bank per Joseph Vance's requested edits (.5); edit and organize research memorandum per Edward Decker's recommendations (1.1)
12/08/22	J. Vance	3.5	Analyze discovery requests (2.0); analyze draft expert report (1.5)
12/09/22	E. Decker	1.1	Correspond with Peter Hawkes re privilege review (.1); correspond with class action counsel re shared strategy (.2); telephone call with Lisa Peterson re upcoming productions (.4); draft chronology of key Riverview Bank events (.4)

January 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/09/22	L. Peterson	6.5	Continue to review, analyze, and compile documents for David Foraker deposition preparation in databases (3.0); emails with Sarah Houser at Streamline Imaging re exporting certain produced documents from database (.4); emails with Joseph Spring re exporting certain produced documents from database and preparation of Excel file of metadata (.9); telephone call with Edward Decker re upcoming productions (.4); revise production of documents from database email based on Pacific Premier Bank's October 2022 search terms, and provide litigation support with instructions for re-run of document production (1.0); prepare ShareFile of documents for David Foraker deposition and email to Joseph Vance with link (.5); email to Sarah Houser to request additional assistance with searches in database (.3)
12/09/22	B. Shattuck	3.4	Legal research and draft research memorandum
12/09/22	J. Vance	6.5	Virtual meeting with Hannah Schmidt re damages analysis (1.0); exchange emails with other parties re deposition scheduling (.5); prepare for depositions (5.0)
12/12/22	E. Decker	2.8	Analyze draft expert report (1.1); virtual meeting with AEM investors' counsel re litigation updates (.4); virtual meeting with Joseph Vance re depositions and productions of documents (.2); communications with Lisa Peterson re productions of documents (.3); coordinate production of documents to bank defendants (.8)
12/12/22	D. Foraker	0.4	Virtual meeting with Chris Kayser, John Stephens, Edward Decker, John Rake, Joseph Vance, and Hannah Schmidt re litigation updates
12/12/22	L. Peterson	3.7	Communications with Edward Decker re productions of documents (.5); review search results in database and formulate additional searches (1.5); emails with Sarah Houser re revisions to searches and to request search results reports (.3); review revised production based on Pacific Premier Bank's October 2022 search terms, prepare ShareFile, and email link to Edward Decker (.6); review documents in database hitting on search term Regents and email summary to Edward Decker (.6); update document index (.2)

January 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/12/22	T. Sand	0.3	Email opposing counsel re draft court order (.1); email Joseph Vance and Edward Decker re discovery strategy (.2)
12/12/22	B. Shattuck	0.6	Finalize and distribute research memorandum
12/12/22	J. Vance	6.5	Analyze draft expert report (1.0); virtual meeting with AEM investors' counsel re litigation updates (.4); virtual meeting with Edward Decker (.2); prepare for depositions (4.9)
12/13/22	E. Decker	2.5	Virtual meeting with Tom Sand, Lorien Giles, and Ben Shattuck re discovery status and upcoming depositions (.3); virtual meeting with Hannah Schmidt, Joseph Vance, and expert witnesses (1.0); telephone call with Lisa Peterson re analysis of data on Streamline Imaging database (.3); analyze data in proposed production set (.5); draft chronology of key Riverview Bank events (.4)
12/13/22	L. Giles	0.3	Virtual meeting with Tom Sand, Edward Decker, and Ben Shattuck re discovery status and upcoming depositions
12/13/22	L. Peterson	4.3	Emails with Hannah Schmidt and Joseph Vance re Lincoln Data exports (.1); download, organize, and prepare instructions for inclusion of Lincoln Data exports in electronic database (.5); emails with Sarah Houser re formulating new search in database and request for tally reports (.5); review and analyze search hits (1.8); telephone call with Edward Decker re analysis of data on Streamline Imaging database (.3); email to Sarah Houser re formulating searches in database related to Hamstreet collection of emails (.2); email to Edward Decker with summary of proposed production set from AEI loose files and emails in database (.9)
12/13/22	T. Sand	0.4	Virtual meeting with Edward Decker, Lorien Giles, and Ben Shattuck re discovery status and upcoming depositions (.3); email Kristin Asai re order (.1)
12/13/22	B. Shattuck	0.3	Virtual meeting with Tom Sand, Edward Decker, and Lorien Giles re upcoming depositions and discovery status

January 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/13/22	J. Vance	7.0	Virtual meeting with Clyde Hamstreet re preparation for deposition (1.0); virtual meeting with Hannah Schmidt, Edward Decker, and expert witnesses (1.0); review draft of expert report (1.0); exchange communications with opposing counsel re proposed order (.2); prepare for depositions (3.8)
12/14/22	E. Decker	0.4	Telephone calls with Lisa Peterson re review of documents for production to bank defendants
12/14/22	H. Harmon	0.5	Prepare notice of deposition of Daniel Cox and Riverview Bank deposition (.3); coordinate court reporter and videographer services for Daniel Cox deposition and update case docketing (.2)
12/14/22	C. McCoy	4.7	Review client documents for responsiveness in preparation for production
12/14/22	L. Peterson	3.0	Telephone calls with Edward Decker re review of documents for production to bank defendants (.4); email to Sarah Houser with search request (.1); virtual meeting with Carol McCoy re AEI document review in database (.5); review save searches and communications with Streamline Imaging to duplicate key search for use with second collection of Hamstreet emails (.5); emails with Leann Astheimer re receiver's production (.2); review Lincoln Data reports in database and tag for production (.3); emails with Joseph Vance re Lincoln Data reports (.1); prepare instructions for production run on Lincoln Data reports (.2); review and analyze Hamstreet emails for privilege and responsiveness to discovery requests (.7)
12/14/22	J. Vance	5.0	Prepare for depositions
12/15/22	E. Decker	1.4	Telephone calls with Lisa Peterson re review of documents for production to bank defendants (.4); virtual meeting with Lisa Peterson and Carol McCoy re review of documents for production to bank defendants (.2); analyze documents to be produced to bank defendants (.4); virtual meeting with Joseph Vance re Riverview Bank depositions (.2); telephone call with counsel for Riverview Bank re Lincoln Data (.2)

January 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/15/22	H. Harmon	0.6	Assist with preparation of Monte Schwartz deposition outline and exhibits
12/15/22	C. McCoy	3.9	Virtual meeting with Edward Decker and Carol McCoy re review of documents for production to bank defendants (.2); review client documents for responsiveness in preparation for production (3.7)
12/15/22	L. Peterson	4.6	Emails with Streamline Imaging with request to upload recent receiver productions to database (.3); telephone calls with Edward Decker re review of documents for production to bank defendants (.4); emails with Streamline Imaging re searches (.8); emails with Edward Decker and Carol McCoy re searches (.3); emails with Joseph Vance re production of Lincoln Data reports (.1); finalize production of Lincoln Data reports and prepare ShareFile for same (1.1); emails with Edward Decker re Lincoln Data reports (.1); update document index (.3); virtual meeting with Edward Decker and Carol McCoy re review of documents for production to bank defendants (.2); continue to review and analyze documents in database for privilege and responsiveness to discovery requests from AEI's forensically collected computers (1.0)
12/15/22	T. Sand	0.2	Review plan for double tracking depositions (.1); review status of document production (.1)
12/15/22	J. Vance	5.3	Prepare for depositions (5.1); virtual meeting with Edward Decker re Riverview Bank depositions (.2)
12/16/22	E. Decker	1.4	Telephone call with Lorien Giles re upcoming depositions (.3); virtual meeting with Joseph Vance re depositions (.1); prepare for Pacific Premier Bank deposition (.3); finalize production of data to Riverview Bank (.2); oversee review of documents for production to Pacific Premier (.3); draft chronology of key Riverview Bank events (.2)
12/16/22	H. Harmon	0.8	Assist with preparation of potential exhibits for Monte Schwartz deposition
12/16/22	L. Peterson	3.2	Continue to review and analyze documents in database for privilege and responsiveness to discovery requests from AEI's forensically collected computers

January 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/16/22	T. Sand	0.3	Review email re deposition scheduling and document production
12/16/22	J. Vance	2.3	Prepare for depositions (2.2); virtual meeting with Edward Decker re depositions (.1)
12/19/22	E. Decker	8.0	Prepare for and attend deposition of Monte Schwartz
12/19/22	L. Giles	4.9	Draft deposition outline for Riverview Bank Rule 30(b)(6) deposition (4.6); telephone call with Edward Decker re upcoming depositions (.3)
12/19/22	L. Peterson	4.0	Review documents produced by Pacific Premier Bank (.5); continue to review and analyze Hamstreet email collection for privilege and responsiveness to discovery requests (3.3); emails with Streamline Imagining re search parameters for Hamstreet emails (.2)
12/19/22	T. Sand	0.6	Email counsel re deposition schedule (.2); review court decision for use in opposition to motion for summary judgment (.2); telephone call with Matt Kalmanson re David Foraker deposition (.2)
12/19/22	J. Vance	10.0	Prepare for and take the deposition of Monte Schwartz
12/20/22	E. Decker	1.4	Virtual meeting with Lisa Peterson re review of documents for production to bank defendants (.5); telephone call with Peter Hawkes re upcoming depositions (.1); analyze new federal court ruling on aiding and abetting breaches of fiduciary duty (.2); virtual meeting with Tom Sand, Joseph Vance, Lorien Giles, and Ben Shattuck re upcoming depositions and outstanding discovery (.6)
12/20/22	L. Giles	4.1	Draft deposition outlines (3.5); virtual meeting with Tom Sand, Joseph Vance, Edward Decker, and Ben Shattuck re upcoming depositions and outstanding discovery (.6)
12/20/22	H. Harmon	0.2	Obtain selected copies of court filings in Camenisch v. Umpqua Bank case for attorney review

January 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/20/22	L. Peterson	5.1	Continue to review and analyze Hamstreet email collections for privilege and responsiveness to discovery requests (3.4); virtual meeting with Edward Decker re review of documents for production to bank defendants (.5); virtual meeting with Carol McCoy re document review (.8); export certain La Pine documents from database (.4)
12/20/22	T. Sand	0.7	Virtual meeting with Joseph Vance, Edward Decker, Lorien Giles and Ben Shattuck re upcoming depositions and outstanding discovery (.6); email Matt Kalmanson re David Foraker deposition (.1)
12/20/22	B. Shattuck	0.8	Virtual meeting with Joseph Vance, Tom Sand, Edward Decker, and Lorien Giles re upcoming depositions and outstanding discovery (.6); review expert damages report (.2)
12/20/22	J. Vance	2.5	Virtual meeting with Tom Sand, Lorien Giles, Ben Shattuck, and Edward Decker (.6); virtual meeting with Hannah Schmidt (.8); outline responses to interrogatories (1.1)
12/21/22	E. Decker	1.1	Virtual meeting with Lisa Peterson and Carol McCoy re privilege review of receiver's documents (.7); plan strategy for upcoming depositions (.4)
12/21/22	L. Giles	5.7	Draft deposition outlines
12/21/22	C. McCoy	5.0	Virtual meeting with Edward Decker and Lisa Peterson re privilege review of receiver's documents (.7); review client documents for responsiveness and privilege in preparation for production (4.3)
12/21/22	L. Peterson	5.8	Virtual meeting with Edward Decker and Carol McCoy re privilege review of receiver's documents (.7); continue to review and analyze Hamstreet document collection for privilege and responsiveness to discovery requests (3.3); continue to review AEI documents for production from database (1.3); emails with Jason Walton and Sarah Houser at Streamline Imaging re document searches and to provide instructions for production of AEI documents (.5)

January 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/21/22	T. Sand	0.5	Review plan for deposition attendance in light of witnesses asserting 5th amendment rights (.2); email Annie Banks and Kristin Asai re deposition schedule and logistics (.2); plan and strategize re David Foraker deposition (.1)
12/21/22	J. Vance	1.5	Outline interrogatory responses
12/22/22	E. Decker	1.6	Virtual meeting with Hannah Schmidt and Joseph Vance re responses to Pacific Premier Bank's interrogatories (1.0); oversee privilege review of documents collected from receiver (.2); draft chronology of key Riverview Bank events (.4)
12/22/22	L. Giles	5.5	Draft deposition outlines
12/22/22	C. McCoy	3.9	Update client files and production indices and prepare attorney review set of supplemental production received from Riverview Bank (.7); review client documents for responsiveness and privilege in preparation for production (3.2)
12/22/22	T. Sand	0.1	Email Hannah Schmidt and Joseph Vance re upcoming depositions
12/22/22	B. Shattuck	4.2	Edit expert damages report
12/22/22	J. Vance	2.5	Exchange communications with Matt Donohue re discovery (.5); virtual meeting with Hannah Schmidt and Edward Decker (1.0); prepare responses to interrogatories (1.0)
12/23/22	E. Decker	2.0	Draft responses to Pacific Premier Bank's interrogatories (1.3); oversee review and production of documents responsive to Pacific Premier Bank's search terms (.7)
12/23/22	D. Foraker	0.2	Email to Chris Kayser et al re proposed cancellation of 12/26 meeting and related emails
12/23/22	L. Giles	5.3	Draft deposition outlines

January 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/23/22	C. McCoy	2.8	Review client documents for responsiveness and privilege in preparation for production (2.3); related telephone calls with Lisa Peterson (.5)
12/23/22	L. Peterson	0.5	Telephone calls from Carol McCoy re document review issues
12/23/22	B. Shattuck	5.0	Edit expert damages report
12/27/22	E. Decker	0.5	Virtual meeting with Tom Sand, Lorien Giles, and Ben Shattuck re discovery, depositions, and expert reports (.2); oversee review and production of documents responsive to Pacific Premier Bank's search terms (.1); prepare for upcoming depositions (.2)
12/27/22	L. Giles	3.5	Virtual meeting with Tom Sand, Edward Decker, and Ben Shattuck re discovery, depositions, and expert reports (.2); draft deposition outline (3.3)
12/27/22	H. Harmon	0.2	Update case file and docketing with deposition scheduling
12/27/22	C. McCoy	5.3	Review Hamstreet documents and tag accordingly in preparation for production
12/27/22	C. McCoy	1.6	Review client documents for responsiveness and privilege in preparation for production
12/27/22	T. Sand	0.9	Virtual meeting with Edward Decker, Lorien Giles, and Ben Shattuck re discovery, depositions and expert reports (.2); review draft expert witness report (.5); review deposition notices and subpoenas (.2)
12/27/22	B. Shattuck	6.2	Virtual meeting with Edward Decker, Tom Sand, and Lorien Giles re depositions, discovery, and expert report (.2); edit expert damages report (2.9); work on outline for Riverview Bank's Rule 30(b)(6) deposition (3.1)
12/27/22	J. Vance	1.5	Exchange communications with other parties re deposition scheduling (.5); revise interrogatory responses (1.0)

January 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/28/22	E. Decker	0.8	Virtual meeting with Joseph Vance re upcoming depositions and expert reports (.3); virtual meeting with Lorien Giles re Ross Miles depositions (.2); revise draft expert report (.3)
12/28/22	D. Foraker	0.2	Emails with Hannah Schmidt and litigation team re scheduling of litigation status meeting
12/28/22	L. Giles	6.4	Draft deposition outlines (6.2); virtual meeting with Edward Decker re Ross Miles depositions (.2)
12/28/22	H. Harmon	0.3	Prepare amended notice of deposition for Tami Nesburg and prepare for distribution and update docketing and court reporter services
12/28/22	C. McCoy	2.3	Review client documents in preparation for production (1.4); update client files and production log and prepare ShareFile link for service of receiver AEI production (.9)
12/28/22	T. Sand	0.9	Review draft expert report (.6); email Kristin Asai re motion to extend discovery deadlines and revised dates for depositions (.3)
12/28/22	B. Shattuck	5.8	Work on outline for Riverview Bank's Rule 30(b)(6) deposition (5.3); legal research (.5)
12/28/22	J. Vance	3.8	Prepare answers to interrogatories (3.5); virtual meeting with Edward Decker (.3)
12/29/22	E. Decker	1.2	Virtual meeting with Hannah Schmidt, Joseph Vance, and expert witnesses regarding damages report (.7); analyze draft expert report (.2); prepare documents for production (.3)
12/29/22	L. Giles	5.8	Review discovery (1.7); draft deposition outline (4.1)
12/29/22	T. Sand	0.5	Email Kristin Asai re modifications to deposition schedule and case management order (.2); review draft discovery responses (.2); email Annie Banks re third party depositions (.1)

January 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
12/29/22	B. Shattuck	4.7	Legal research and draft research memorandum (4.0); work on outline for Riverview Bank's Rule 30(b)(6) deposition (.7)
12/29/22	J. Vance	3.5	Prepare answers to interrogatories (2.5); virtual meeting with Hannah Schmidt, Edward Decker, and expert witnesses (.7); review emails re deposition scheduling (.3)
12/30/22	E. Decker	1.5	Draft responses to Pacific Premier Bank's interrogatories (1.0); finalize production of AEI documents responsive to Pacific Premier Bank's search terms (.5)
12/30/22	L. Giles	6.4	Prepare for Ross Miles deposition (5.6); work on outline for Riverview Bank's Rule 30(b)(6) deposition (.8)
12/30/22	C. McCoy	0.8	Conduct searches in database for custodian email addresses for attorney review
12/30/22	T. Sand	0.3	Review status of document production to defendants (.1); email Annie Banks re depositions (.1); review defendant's motion to amend scheduling order (.1)
12/30/22	B. Shattuck	0.3	Organize exhibits re Riverview Bank's Rule 30(b)(6) deposition
12/31/22	E. Decker	0.1	Serve production of AEI documents on bank defendants

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
T. Sand	Partner	8.0	\$825	\$6,600.00
D. Foraker	Partner	0.8	630	504.00
J. Vance	Partner	78.9	550	43,395.00
E. Decker	Partner	38.6	475	18,335.00
L. Giles	Associate	52.9	380	20,102.00
B. Shattuck	Associate	55.4	350	19,390.00
C. McCoy	Paralegal	30.3	280	8,484.00
L. Peterson	Paralegal	64.7	280	18,116.00
H. Harmon	Paralegal	3.7	225	832.50
Summary Total:		333.3		\$135,758.50

January 6, 2023

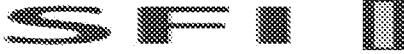
Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Streamline Imaging: Storage and access fees for November and project management time used in November	2,262.50
Purchase of the 11/21/22 hearing recording before Judge Gregerson	27.00
LexisNexis Risk Solutions: Computer services on Nov 30th	36.80
Disbursement Total:	\$2,326.30

Invoice Summary

Professional Fees Through December 31, 2022	\$135,758.50
Disbursements	<u>\$2,326.30</u>
Amount Due - Current Period:	<u>\$138,084.80</u>

EXHIBIT C



SPECIALIZED
FORENSIC
INVESTIGATIONS

Invoice

Specialized Forensic Investigations LLC

5701 Lonetree Blvd., Suite 212
Rocklin, CA 95765

Invoice Date:	Invoice #:
1/4/2023	1731

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
2/4/2023	Hamstreet & Associates	

Date	Description	Hours	Rate	Amount
12/8/2022	Phone call Preparation for and call with Hamstreet and Ueltzen	0.5	300.00	150.00
12/13/2022	Phone call Preparation for and call with Hamstreet, Ueltzen, and attorneys	1.1	300.00	330.00
12/13/2022	Investigation Review of Hamstreet and Ueltzen material/report	0.9	300.00	270.00
12/19/2022	Investigation Review damage report and other documents emailed	1	300.00	300.00
12/29/2022	Phone call Preparation for and call with Hamstreet, Ueltzen, and attorneys	0.7	300.00	210.00
12/30/2022	Investigation Review updated damage report	0.5	300.00	150.00

Thank you for your business.	Total	\$1,410.00
	Payments/Credits	\$0.00
	Balance Due	\$1,410.00

EXHIBIT D

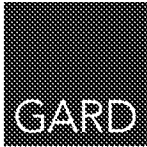
Michael G. Ueltzen, CPA
606 East Ranch Road
Sacramento, CA 95825
916-333-2793
85-3260070

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

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

Date	Description	Person	Hours	Rate	Amount
12/1/2022	Call with HS	MU	0.2	450.00	\$ 90.00
12/2/2002	Report	MU	2.9	450.00	1,305.00
12/6/2022	Report	MU	4.3	450.00	1,935.00
12/7/2022	Report	MU	3.7	450.00	1,665.00
12/8/2022	Call with accounting team; report	MU	2.9	450.00	1,305.00
12/9/2022	Report	MU	4.4	450.00	1,980.00
12/10/2022	Report	MU	3.7	450.00	1,665.00
12/11/2022	Report	MU	1.4	450.00	630.00
12/12/2022	Call with HS and related analysis	MU	1.8	450.00	810.00
12/13/2022	Call with HS; review key documents	MU	1.9	450.00	855.00
12/18/2022	Report	MU	4.4	450.00	1,980.00
12/19/2022	Report	MU	4.6	450.00	2,070.00
12/24/2022	Report	MU	0.6	450.00	270.00
12/28/2022	Report	MU	0.8	450.00	360.00
12/29/2022	Call with counsel; edits & preparation of exhibits; report	MU	3.9	450.00	<u>1,755.00</u>
	Total Fees				<u>\$ 18,675.00</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 14913
Date 12/31/22
Job Number AEM-003
PO# --
Charge# --

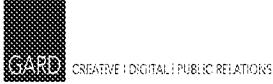
Job Name: Microsite Updates & Maintenance

Agency Contact Brian Gard

Description: For Professional Services Rendered Through December, 2022:

Description	Hours Billed	Amount
Account Services	0.85	\$130.00
Professional Services Subtotal:	0.85	\$130.00
TOTAL:	0.85	\$130.00

PAYMENT TERMS: net 30 days



Invoice Detail Report

Page 1

Invoice : 14913 Client : Hamstreet & Associates - AEM (AEM)

01/10/23 11:25 AM
(TY)

Reference:	Date:	Vendor/Staff:	Hours:	Billed:		
AEM-003 Microsite Updates & Maintenance						
Account Services:						
			Rate	Hrs	Amount	
397568	12/07/22	TY <i>Account administration</i>	Teri Yamauchi	\$100.00	0.25	\$25.00
398033	12/09/22	NK <i>Document upload</i>	Naureen Khan	\$175.00	0.60	\$105.00
					0.85	\$130.00
		AEM-003 TOTAL			0.85	\$130.00
INVOICE #14913 TOTAL:					0.85	\$130.00

EXHIBIT F

**CROWLEY
FLECK** PLLP
ATTORNEYS

Date: January 06, 2023
 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

Amount Remitted \$ _____

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

Please return this top portion with payment

Invoice Number	Invoice Date	Invoice Total	Payments	Balance Due
990149	December 7, 2022	\$2,124.00	\$0.00	\$2,124.00
Total Previous Balance Due*				\$2,124.00

AGED ACCOUNTS RECEIVABLE

0-30 Days	31-60 Days	61-90 Days	Over 90 Days
\$4,484.00	\$0.00	\$0.00	\$0.00

Please indicate the INVOICE NUMBER on your check
 If you recently mailed a payment, please disregard this reminder

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

**CROWLEY
FLECK** PLLP
ATTORNEYS

Invoice Date: January 06, 2023
 Invoice Number: 992860
 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	\$2,360.00
Current Disbursements	\$0.00
Current Balance Due	\$2,360.00

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
12/02/2022	GS2	Conferences with surveyor regarding retracement.	0.40	\$118.00
12/05/2022	GS2	Conferences with surveyor regarding legal descriptions.	0.30	\$88.50
12/08/2022	GS2	Research water rights inquiry from DNRC.	0.60	\$177.00
12/09/2022	GS2	Review condition of title with surveyor to resolve legal discrepancies.	0.50	\$147.50
12/12/2022	GS2	Conferences with DNRC regarding water rights challenge.	0.50	\$147.50
12/13/2022	GS2	Review water rights file; additional conference with DNRC rep.	1.10	\$324.50
12/15/2022	GS2	Draft correspondence to DNRC regarding property water rights.	0.40	\$118.00
12/16/2022	GS2	Additional conferences with DNRC regarding water rights.	0.40	\$118.00
12/19/2022	GS2	Conferences with surveyor regarding final legal description.	0.30	\$88.50
12/21/2022	GS2	Resolve water rights with DNRC.	0.60	\$177.00
12/23/2022	GS2	Review new survey.	0.60	\$177.00
12/23/2022	GS2	Draft correspondence to agent regarding new survey.	0.50	\$147.50
12/23/2022	GS2	Draft correspondence to client regarding new survey and removal of title exception.	0.50	\$147.50
12/27/2022	GS2	Finalize correspondence to DNRC.	0.30	\$88.50
12/27/2022	GS2	Conference with County Planner regarding final plat.	0.60	\$177.00
12/28/2022	GS2	Conference with surveyor regarding final plat.	0.40	\$118.00
Total Professional Services			8.00	\$2,360.00

**CROWLEY
FLECK** PLLP
ATTORNEYS

Page: 2
Invoice Date: January 06, 2023
Invoice Number: 992860
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

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

Please return this top portion with payment

Total Due Current Invoice

\$2,360.00