

**E-FILED**  
**02-10-2023, 11:00**  
**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 AND JANUARY 2023)

20

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.

RECEIVER'S NOTICE OF INTENT TO COMPENSATE (NOVEMBER AND DECEMBER 2022 AND JANUARY 2023) - 1

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 and January 2023) in accordance with Paragraph 11 of the Order Appointing General  
4 Receiver dated May 10, 2019 (the “Receivership Order”), which provides in part: “The Receiver  
5 and the Receiver’s authorized attorneys and other professionals may request to be compensated  
6 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 January 2023. For this period, the Receiver requests  
15 final approval of its compensation in the amount of \$52,955.00 and reimbursement of costs of  
16 \$123.80, for a total payment of \$53,078.80.

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 January 2023.  
19 For this period, such attorneys request final approval of their compensation in the amount of  
20 \$193,921.00 and reimbursement of costs of \$24,720.24, for a total payment of \$218,641.24.

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 accountant Michael G. Ueltzen, CPA, for services and costs  
23 in January 2023. For this period, such forensic accountant requests final approval of his  
24 compensation in the amount of \$1,170.00 and reimbursement of no costs, for a total payment of  
25 \$1,170.00.

1 Attached as Exhibit D hereto is a true and correct copy of the time and expense summary  
2 of the Receiver's authorized public communications consultants, Gard Communications, Inc., for  
3 services and costs in January 2023. For this period, such consultants request final approval of  
4 their compensation in the amount of \$140.00 and reimbursement of costs of \$400.00, for a total  
5 payment of \$540.00.

6 Attached as Exhibit E hereto is a true and correct copy of the time and expense summary  
7 of the Receiver's authorized special counsel in Mexico, Rosen Law, S.C., for services and costs  
8 in November and December 2022 and January 2023. For this period, such attorneys request final  
9 approval of their compensation in the amount of \$3,706.00 and reimbursement of no costs, for a  
10 total payment of \$3,706.00.

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 January 2023. For this period, such attorneys request final approval of their  
14 compensation in the amount of \$1,622.50 and reimbursement of no costs, for a total payment of  
15 \$1,622.50.

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 February 27, 2023, the Receiver may make the  
18 payments requested herein and/or the professionals may apply their retainers, if any.

19 DATED this 10<sup>th</sup> day of February, 2023.

20 MILLER NASH LLP

21  
22 /s/ John R. Knapp, Jr.

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

24 Attorneys for Receiver  
25 Clyde A. Hamstreet & Associates, LLC  
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# EXHIBIT A



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

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Invoice submitted to:  
American Eagle Mortgage Investment Funds Receiverships  
4225 NE St James Road  
Vancouver, WA 98663

February 9, 2023

Invoice # 2590

Professional Services

			<u>Hours</u>	<u>Amount</u>
1/3/2023	MC	Litigation Support Review Michael Ueltzen report. Review relativity report.	2.60	390.00
	HS	Litigation Support Review draft of damages report.	1.00	500.00
	HS	Litigation Support Attend Ross Miles deposition.	4.00	2,000.00
1/4/2023	MC	Litigation Support Rework exhibits and other details from Michael Ueltzen's report.	3.10	465.00
	MC	Receivership Duties Process checks and update contract spreadsheets for year end. Redirect returned mail; administrative clean up.	1.20	180.00
	HS	Receivership Duties Read and respond to emails.	0.50	250.00
	HS	Litigation Support Review draft of damages report. Calls with Martha Cohn regarding same.	1.20	600.00
1/5/2023	MC	Litigation Support Merge edits on report.	0.60	90.00
	CAH	Receivership Duties Prepare for and participate in zoom meeting with Hannah Schmidt and counsel regarding litigation. Review and ask questions regarding billing details.	2.30	1,380.00
	HS	Litigation Support Participate in litigation status call. Follow up calls with Joe Vance regarding interrogatories and with Clyde Hamstreet.	1.60	800.00
	HS	Litigation Support Work with Mike Ueltzen regarding damage report.	2.00	1,000.00

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		<u>Hours</u>	<u>Amount</u>
1/5/2023	HS Riverview Bank Review 30(b)(6) topics.	2.00	1,000.00
1/6/2023	MC Receivership Duties Reach out to investors with returned checks; research transfer of claim process for investor.	1.10	165.00
	MC Receivership Duties Start 1099s for 2022.	1.30	195.00
	MC Receivership Duties Call county and locksmith on Nehalem house. Enter and process checks and mail.	1.70	255.00
	CAH Receivership Duties Prepare for and attend full day being deposed by bank lawyers.	8.40	5,040.00
	HS Litigation Support Attend Lynn Barnett deposition.	8.00	4,000.00
1/8/2023	CAH Receivership Duties Conference call with Hannah Schmidt regarding Lynn Barnett's deposition and my deposition. Discuss Mexico.	0.60	360.00
1/9/2023	MC Receivership Duties Talk to John Knapp and investor about claim transfer process.	0.50	75.00
	MC Receivership Duties Year-end payment histories and Evergreen reconciliation. Continue work on 1099s.	3.50	525.00
	HS Litigation Support Attend Dan Cox deposition. Follow up discussion with Joe Vance.	7.50	3,750.00
1/10/2023	MC Receivership Duties Evergreen reconciliation. Start quarterly reporting.	3.10	465.00
	HS Receivership Duties Prepare for and call with Ben Rosen and Veronica Hamstreet regarding Mar de Plata and Mexico taxes. Follow up emails regarding same.	1.50	750.00
1/11/2023	MC Receivership Duties Prepare 1099.	2.20	330.00
1/12/2023	MC Receivership Duties Prepare information for and take calls from investors. Work on quarterly reporting.	2.00	300.00
1/13/2023	MC Receivership Duties Quarterly reporting. Process mail and checks.	1.90	285.00
1/16/2023	MC Litigation Support Search through relativity.	1.10	165.00

		<u>Hours</u>	<u>Amount</u>
1/16/2023	MC Receivership Duties Finalize and fill out 1099s. Work on quarterly reporting.	3.00	450.00
1/17/2023	MC Litigation Support Search relativity for Jackpine and other documents.	2.30	345.00
	CAH Receivership Duties Speak with Oregon investor who objects to offset his recovery from DWT settlement against his claims against AEM.	0.30	180.00
1/18/2023	MC Litigation Support Compile relativity search for Jackpine and go through county documents. Compile results and timeline.	3.00	450.00
	MC Receivership Duties Quarterly reporting.	0.80	120.00
1/19/2023	MC Receivership Duties Quarterly reporting. Reconcile contract information to Quickbooks balances.	3.10	465.00
	CAH Receivership Duties Review Hannah Schmidt's thoughts on depositions she has attended. Prepare for and participate in litigation meeting with Miller Nash counsel. Review general status of case with Hannah Schmidt and Martha Cohn.	2.60	1,560.00
	HS Litigation Support Discuss case status and depositions with Clyde Hamstreet.	0.50	250.00
1/20/2023	MC Receivership Duties Finalize Quickbooks contracts reconciliation and last of quarterly reporting. Process local checks and mail.	3.40	510.00
1/23/2023	MC Litigation Support Search in relativity; export and organize Jackpine documents.	1.80	270.00
	MC Receivership Duties Draft borrower loan modification. Update quarterly report for Mexico assets.	1.70	255.00
	HS Litigation Support Review exhibits from Clyde Hamstreet deponiton.	0.50	250.00
	HS Receivership Duties Review Mexico bank activity and draft of quarterly reporting. Emails regarding same.	2.20	1,100.00
	HS Receivership Duties Call with Jim Hart regarding Mar de Plata. Follow up message to Evelyn Torres regarding environmental status.	0.20	100.00
	HS Litigation Support Deposition preparation with Edward Decker and Joe Vance.	3.20	1,600.00

		<u>Hours</u>	<u>Amount</u>
1/24/2023	MC Receivership Duties Process checks; update payer contract; call servicers on delinquent payers; review borrower's contract files; process claim transfer and reissue check.	2.80	420.00
	CAH Receivership Duties Review status of depositions with Hannah Schmidt, discuss details on liquidity issues of various pools prior to 2007.	1.60	960.00
	MC Receivership Duties Relativity search; settlement statements. Discuss new project with Hannah Schmidt. Draft first pool financial summary.	3.10	465.00
	HS Receivership Duties Review and finalize quarterly reporting.	2.00	1,000.00
	HS Litigation Support Prepare for 30(b)(6) depositions and respond to interrogatories.	5.50	2,750.00
1/25/2023	MC Receivership Duties Submit final tax forms.	0.50	75.00
	MC Litigation Support Draft pool financial summaries.	3.50	525.00
	HS Litigation Support Prepare for 30(b)(6) depositions.	5.00	2,500.00
1/26/2023	MC Litigation Support Research pool financial histories.	3.80	570.00
	MC Receivership Duties Calls from borrowers; add journal entry for contract management. Call Tillamook county for property taxes.	1.20	180.00
	CAH Receivership Duties Review progress on depositions with Hannah Schmidt.	0.60	360.00
	HS Receivership Duties Call with Mexico team regarding Mar de Plata and Todos Santos progress.	0.30	150.00
	HS Litigation Support Prepare for 30(b)(6) depositions.	6.00	3,000.00
1/27/2023	MC Litigation Support Draft pool financial histories.	2.50	375.00
	HS Receivership Duties Get cashier's check for Tillamook County taxes.	0.20	100.00
	HS Pacific Premier Bank Call with Edward Decker regarding interrogatories.	0.20	100.00



			<u>Hours</u>	<u>Amount</u>
1/30/2023	MC	Litigation Support Pool financial histories.	1.00	150.00
	MC	Receivership Duties Enter and print checks. Visit Tillamook courthouse to remedy tax delinquency. Meet locksmith at Nehalem property to regarding-key. Meet with tenant to walk through the house. Walk and take picture of the house and lot.	1.50	225.00
	CAH	Receivership Duties Review activities on Nehalem negotiated property eviction with Martha Cohn and Hannah Schmidt.	0.30	180.00
	MC	Receivership Duties Drive to Tillamook and Nehalem and return.	4.20	630.00
	HS	Litigation Support Email to Edward Decker regarding conversion.	1.00	500.00
1/31/2023	MC	Litigation Support Create payoff and summary for delinquent borrower. Process files, receipts, and photos from Nehalem visit.	1.00	150.00
	MC	Receivership Duties Draft pool financial summaries.	2.20	330.00
	CAH	Receivership Duties Review quarterly report and discuss upcoming depositions with Joe Vance and Hannah Schmidt, follow up on REO.	0.90	540.00
	HS	Litigation Support Prepare for 30(b)(6) depositions. Review interrogatory responses.	7.00	3,500.00
<b>For professional services rendered</b>			<b>153.00</b>	<b>\$52,955.00</b>
Additional Charges :				
			<u>Price</u>	<u>Qty</u>
1/30/2023	Miles for round trip for Martha Cohn to Tillamook and Nehalem .		\$0.66	189 123.80
<b>Total additional charges</b>				<b>\$123.80</b>
<b>Total amount of this bill</b>				<b>\$53,078.80</b>
Accounts receivable transactions				
1/31/2023	Payment invoice #2586- Thank You. Check No. 1674			(\$44,895.00)
<b>Total payments and adjustments</b>				<b>(\$44,895.00)</b>

	<u>Amount</u>
Balance due	<u>\$53,078.80</u>

Name	Consultant Summary	Hours	Rate	Amount
Clyde A. Hamstreet - Principal		17.60	600.00	\$10,560.00
Hannah Schmidt - Consultant		63.10	500.00	\$31,550.00
Martha Cohn - Jr. Consultant		72.30	150.00	\$10,845.00

# EXHIBIT B

Client.Matter	Description	Bill Amt	Fees	Costs	Bill Num
721921.0001	American Eagle Mortgage Investment Funds	\$9,570.74	\$9,420.50	\$150.24	2202870
721921.0017	Adjunct Litigation Claims Against Ross Miles, Maureen Wile, et al.	\$209,070.50	\$184,500.50	\$24,570.00	2202878
		\$218,641.24	\$193,921.00	\$24,720.24	



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: 2202870  
February 2, 2023

**Invoice Summary**

Professional Fees Through January 31, 2023	\$9,420.50
Disbursements	<u>\$150.24</u>
<b>Amount Due – Current Period:</b>	<b><u>\$9,570.74</u></b>

**To pay by wire transfer, route to:**

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

**To pay by credit card, use this link:**

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

**To pay by check, remit to:**

PO Box 3585  
Portland, OR 97208-3585

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

**Invoice Detail**

<b><u>Date</u></b>	<b><u>Professional</u></b>	<b><u>Time</u></b>	<b><u>Description of Services</u></b>
01/03/23	J. Knapp	0.4	Emails with Hannah Schmidt re annual renewals of AEM entities
01/03/23	J. Palomares	0.3	Emails with Hannah Schmidt re negotiations with Nehalem occupants for move out agreement (.2); email to Tony Kullen re FED eviction for Nehalem property (.1)
01/04/23	J. Knapp	0.5	Draft notice of intent to compensate (December 2022) (.3); emails with Paul Artley re notice of intent to compensate (December 2022) (.2)
01/05/23	D. Foraker	0.2	Emails with Hannah Schmidt re receiver's fourteenth quarterly report
01/05/23	J. Knapp	0.3	Continue drafting notice of intent to compensate (December 2022)
01/06/23	J. Knapp	0.6	Continue drafting notice of intent to compensate (December 2022) (.4); emails with Michael Ueltzen re notice of intent to compensate (December 2022) (.2)
01/09/23	J. Knapp	0.2	Telephone call with Martha Cohn re claim transfer issue
01/10/23	J. Knapp	1.3	Email communications with Veronica Hamstreet and Teri Yamauchi re notice of intent to compensate (December 2022) (.4); continue drafting notice of intent to compensate (December 2022) (.7); email communications with Hannah Schmidt re engagement of Mexican tax advisor (.2)
01/10/23	J. Palomares	0.6	Emails with Hannah Schmidt re strategy for Nehalem property removal of occupants (.3); emails with Tony Kullen re foreclosure trustee notices to Nehalem occupants and eviction lawsuit strategy (.3)
01/12/23	J. Knapp	0.6	Emails with Ben Rosen re notice of intent to compensate (December 2022) (.2); continue drafting notice of intent to compensate (December 2022) (.4)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
01/13/23	H. Harmon	0.3	Assist with finalization of notice of intent to compensate (December 2022) and prepare for electronic filing and distribution
01/13/23	J. Knapp	0.7	Finalize notice of intent to compensate (December 2022) (.5); emails with Naureen Khan re transmittal of notice of intent to compensate (December 2022) for uploading to website (.2)
01/17/23	J. Knapp	0.3	Email communications with Hannah Schmidt and Alejandro Centeno Zubia re employment application for Kreston BSG auditors
01/17/23	J. Palomares	0.2	Emails with Hannah Schmidt and Tony Kullen re move out agreement and re first appearance logistics for eviction hearing for Nehalem property
01/23/23	D. Foraker	0.8	Review notice of supplemental authority with Multnomah County Circuit Court opinion and order filed in AEM Oregon investors' federal district court class action case and related emails (.7); emails with Hannah Schmidt re status of fourteenth quarterly report (.1)
01/23/23	J. Knapp	0.7	Emails with Martha Cohn re Scalone claim transfer documentation (.2); review Scalone claim transfer documentation (.2); emails with Hannah Schmidt re quarterly report (.1); telephone conference with Hannah Schmidt re claims order (.2)
01/24/23	D. Foraker	0.6	Review and edit draft of receiver's fourteenth quarterly report for period ended 12/31/2022 and related emails
01/24/23	J. Knapp	1.9	Email with Martha Cohn re claim transfer documentation (.1); emails with Hannah Schmidt and David Foraker re quarterly report (.5); review and comment on quarterly report (1.0); draft notice of filing of quarterly report (.3)
01/25/23	J. Knapp	0.5	Review letter from Neil Rylander re claim and related emails (.3); review order adjusting claim amounts (.1); emails with Martha Cohn re letter from Neil Rylander (.1)
01/26/23	D. Foraker	0.2	Review revised draft of receiver's sixteenth quarterly report and related emails

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
01/26/23	J. Knapp	0.3	Emails with Hannah Schmidt re SEC call and quarterly report
01/27/23	B. Dickey	0.4	Prepare and file Washington annual reports for American Eagle Mortgage Mexico 500, LLC and American Eagle Mortgage 100, LLC
01/27/23	J. Knapp	0.5	Continue drafting notice of filing of quarterly report
01/30/23	J. Knapp	0.5	Review court docket (.1); email communications with Hannah Schmidt re notice of intent to compensate (December 2022) (.2); revise draft notice of filing of quarterly report (.2)
01/31/23	J. Knapp	2.6	Emails with Greg Schultz and Hannah Schmidt re survey map for Montana property (.3); finalize notice of filing of quarterly report (.2); emails with Naureen Khan re transmittal of quarterly report for posting to website (.2); emails with Peggy McLean re McQuhae deed of trust reconveyance and satisfaction of judgment (.4); draft reconveyance documents (1.5)

**Fee Summary**

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
D. Foraker	Partner	1.8	\$685	\$1,233.00
J. Knapp	Partner	11.9	625	7,437.50
J. Palomares	Partner	1.1	495	544.50
B. Dickey	Paralegal	0.4	330	132.00
H. Harmon	Paralegal	0.3	245	73.50
<b>Summary Total:</b>		<b>15.5</b>		<b>\$9,420.50</b>

**Disbursement Summary**

<u>Disbursements</u>	<u>Amount</u>
Extraordinary postage	\$30.24
Washington Secretary of State Annual Filing Fees for American Eagle Mortgage Mexico 500, LLC and American Eagle Mortgage 100, LLC	120.00
<b>Disbursement Total:</b>	<b>\$150.24</b>



Account: 721921

Invoice: 2202870

February 2, 2023

**Invoice Summary**

Professional Fees Through January 31, 2023	\$9,420.50
Disbursements	<u>\$150.24</u>
<b>Amount Due - Current Period:</b>	<b><u>\$9,570.74</u></b>



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

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

Invoice: 2202878  
February 2, 2023

**Invoice Summary**

Professional Fees Through January 31, 2023	\$184,500.50
Disbursements	\$24,570.00
<b>Amount Due – Current Period:</b>	<b><u>\$209,070.50</u></b>

**To pay by wire transfer, route to:**

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

**To pay by credit card, use this link:**

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

**To pay by check, remit to:**

PO Box 3585  
Portland, OR 97208-3585

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

**Invoice Detail**

<b><u>Date</u></b>	<b><u>Professional</u></b>	<b><u>Time</u></b>	<b><u>Description of Services</u></b>
01/02/23	E. Decker	0.3	Prepare for David Foraker deposition
01/02/23	L. Giles	3.8	Review previous discovery responses to prepare for deposition of Ross Miles
01/03/23	E. Decker	4.7	Virtual meeting with Joseph Vance, Tom Sand, Lorien Giles, and Ben Shattuck re discovery, expert reports, and depositions (.5); draft summary narrative for strategy meeting (2.5); virtual meeting with Lisa Peterson and Carol McCoy re document review and productions (.3); virtual meeting with Lorien Giles and Joseph Vance re Ross Miles deposition (.2); call with counsel for Riverview Bank re upcoming depositions (.3); prepare for upcoming depositions (.9)
01/03/23	L. Giles	7.8	Prepare for and appear at Ross Miles deposition (7.1); virtual meeting with Joseph Vance, Tom Sand, Edward Decker, and Ben Shattuck re discovery, expert reports, and depositions (.5); virtual meeting with Joseph Vance and Edward Decker re Ross Miles deposition (.2)
01/03/23	H. Harmon	0.1	Finalize responses to Riverview Bank's second requests for production and prepare for distribution
01/03/23	C. McCoy	0.3	Virtual meeting with Edward Decker and Lisa Peterson re document review and productions
01/03/23	L. Peterson	0.3	Virtual meeting with Edward Decker and Carol McCoy re document review and productions
01/03/23	T. Sand	3.7	Virtual meeting with Joseph Vance, Edward Decker, Lorien Giles, and Ben Shattuck re discovery, expert reports, and depositions (.5); prepare trial plan and to do list (2.4); review and revise short narrative of case for use at trial (.6); email counsel for parties re depositions and logistics (.2)
01/03/23	B. Shattuck	1.3	Virtual meeting with Joseph Vance, Tom Sand, Edward Decker, and Lorien Giles re discovery, expert reports, and depositions (.5); analyze information for trial (.8)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
01/03/23	J. Vance	1.7	Virtual meeting with Edward Decker, Tom Sand, Lorien Giles, and Ben Shattuck re discovery, expert reports, and depositions (.5); revise interrogatory responses (1.0); virtual meeting with Edward Decker and Lorien Giles re Ross Miles deposition (.2)
01/04/23	E. Decker	5.9	Prepare for and appear at David Foraker deposition (5.7); virtual meeting with Tom Sand and Joseph Vance re preparation for client strategy meeting (.2)
01/04/23	L. Giles	7.4	Draft Riverview Bank Rule 30(b)(6) deposition outline
01/04/23	H. Harmon	0.1	Email communications with Hannah Schmidt confirming upcoming deposition schedule
01/04/23	T. Sand	2.7	Virtual meeting with Edward Decker and Joseph Vance re preparation for client strategy meeting (.2); review and revise trial plan and trial notebooks (2.3); email counsel re depositions (.2)
01/04/23	B. Shattuck	2.1	Analyze information for trial
01/04/23	J. Vance	1.7	Exchange communications re depositions (.4); review and comment on interrogatory responses (1.1); virtual meeting with Tom Sand and Edward Decker re preparation for client strategy meeting (.2)
01/05/23	E. Decker	3.7	Prepare for and attend virtual meeting with Clyde Hamstreet, Hannah Schmidt, Tom Sand, Joseph Vance, and David Foraker re litigation update and strategy (1.5); call with investor counsel re potential deposition (.2); prepare for Lynn Barnett depositions (1.0); call with counsel for Riverview Bank re Dan Cox deposition (.3); prepare for Dan Cox deposition (.7)
01/05/23	D. Foraker	1.5	Prepare for and attend virtual meeting with Clyde Hamstreet, Hannah Schmidt, Tom Sand, Joseph Vance, and Edward Decker re litigation update and strategy
01/05/23	L. Giles	7.7	Review additional materials for and revise Riverview Bank Rule 30(b)(6) deposition outline

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
01/05/23	H. Harmon	0.1	Exchange communications with Edward Decker regarding Lynn Barnett and Barbara Jacobs declarations filed in receivership case
01/05/23	L. Peterson	1.3	Emails with Edward Decker re Lynn Barnett (.1); research database re Lynn Barnett (.5); emails with Sarah Houser re Kristin Asai's request for overlay file (.2); review status of Hamstreet email review and address issues re same (.5)
01/05/23	T. Sand	3.0	Prepare for and attend virtual meeting with Clyde Hamstreet, Hannah Schmidt, David Foraker, Edward Decker, and Joseph Vance re litigation update and strategy (1.8); review and revise trial plan (1.2)
01/05/23	B. Shattuck	1.0	Review and analyze information for trial
01/05/23	J. Vance	3.0	Prepare for and attend virtual meeting with Clyde Hamstreet, Hannah Schmidt, Tom Sand, Edward Decker, and David Foraker re litigation update and strategy (1.5); virtual meeting with Hannah Schmidt re discovery (.5); outline issues for trial (1.0)
01/06/23	E. Decker	7.5	Appear at deposition of Lynn Barnett
01/06/23	L. Giles	4.9	Review additional materials for Riverview Bank Rule 30(b)(6) deposition outline
01/06/23	H. Harmon	0.3	Assist with finalizing responses to Pacific Premier Bank's second requests for production with Michael Ueltzen expert report
01/06/23	L. Peterson	5.5	Review and analyze Riverview Bank's latest production and email summary to Edward Decker (2.5); review loan committee minutes for inclusion of Dan Cox (.5); email to Kristin Asai with overlay file (.1); continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests (2.3); review and respond to email from Tom Sand (.1)
01/06/23	T. Sand	1.0	Review status of potential settlement negotiations (.2); review and revise trial plan (.8)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
01/06/23	J. Vance	9.0	Attend and defend Clyde Hamstreet deposition (8.0); review communications re discovery issues (.4); analyze issues for trial (.6)
01/07/23	L. Giles	1.8	Revise Riverview Bank Rule 30(b)(6) deposition outline
01/08/23	L. Giles	4.3	Review propounded discovery and document productions for Riverview Bank Rule 30(b)(6) deposition outline
01/09/23	E. Decker	8.0	Prepare for and take deposition of Dan Cox
01/09/23	D. Foraker	0.4	Virtual meeting with Mike Esler, Jon Hunt, John Rake, John Stephens, and Joseph Vance re litigation update
01/09/23	L. Peterson	3.1	Communications with Lorien Giles re Riverview Bank loan agreements (.2); review and analyze loan Riverview Bank productions for loan agreements (1.7); transmit Riverview Bank documents to Edward Decker (.3); communications with Joseph Vance re clawback of Hamstreet document (.1); redact Hamstreet document and emails with Streamline re re-production of same (.3); email to counsel with request to delete and replace Hamstreet document (.1); email to Streamline with request to upload Riverview Bank production to database (.3); update document index (.1)
01/09/23	T. Sand	0.4	Review email from Shannon Armstrong re new settlement counsel for Pacific Premier Bank (.1); virtual meeting with Joseph Vance re strategy for response (.3)
01/09/23	B. Shattuck	0.2	Virtual meeting with Joseph Vance to discuss analysis of information for trial
01/09/23	J. Vance	3.0	Virtual meeting with Mike Esler, Jon Hunt, John Rake, John Stephens, and David Foraker re litigation update (.4); virtual meeting with Tom Sand re new settlement counsel for Pacific Premier Bank (.3); review emails from opposing counsel re discovery issues (.3); analyze issues for trial (2.0)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
01/10/23	E. Decker	0.8	Virtual meeting with Tom Sand, Joseph Vance, Ben Shattuck, Lorien Giles, and Lisa Peterson re depositions, outstanding discovery, expert reports, potential settlement, and trial preparation
01/10/23	L. Giles	0.8	Virtual meeting with Tom Sand, Joseph Vance, Edward Decker, Ben Shattuck, and Lisa Peterson re depositions, outstanding discovery, expert reports, potential settlement, and trial preparation
01/10/23	L. Peterson	6.2	Continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests (4.3); attend virtual meeting with attorneys re pre-trial preparations (1.0); compile requested key documents and transcripts (.5); prepare deposition index (.2); emails with attorneys re documents and transcripts (.1); update to Edward Decker re document review (.1)
01/10/23	T. Sand	1.1	Virtual meeting with Joseph Vance, Edward Decker, Lorien Giles, Ben Shattuck, and Lisa Peterson re depositions, outstanding discovery, expert reports, and trial preparation (.8); email Eric English re meeting to discuss settlement of case (.3)
01/10/23	B. Shattuck	0.9	Virtual meeting with Tom Sand, Joseph Vance, Edward Decker, Lorien Giles, and Lisa Peterson re depositions, outstanding discovery, expert reports, potential settlement, and trial preparation (.8); email Lisa Peterson (.1)
01/10/23	M. Tyler	3.5	Review of key background documents including complaint and mediation materials
01/10/23	J. Vance	2.5	Outline issues for trial (1.5); virtual meeting with Tom Sand, Edward Decker, Ben Shattuck, Lorien Giles, and Lisa Peterson (.8); exchange communications with Eric English re scheduling (.2)
01/11/23	E. Decker	8.0	Prepare for and appear at deposition of Barbara Jacobs
01/11/23	L. Giles	0.5	Correspond with court reporter regarding deposition of Ross Miles

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
01/11/23	L. Peterson	5.7	Continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests
01/11/23	T. Sand	1.0	Virtual meeting with Eric English, Pat O'Malley, and Joseph Vance re potential settlement negotiations (.7); conference with Mark Tyler (.3)
01/11/23	M. Tyler	1.5	Continue review of key background documents including complaint and mediation materials (1.1); conference with Tom Sand re deposition summary project (.4)
01/11/23	J. Vance	3.0	Virtual meeting with Eric English, Pat O'Malley, and Tom Sand (.7); prepare for deposition (2.3)
01/12/23	E. Decker	5.8	Prepare for and appear at deposition of Miles Minsker (4.8); telephone call with Joseph Vance re depositions (.2); virtual meeting with Lorien Giles re upcoming third-party depositions (.2); update chronology of key Riverview Bank events (.6)
01/12/23	D. Foraker	0.1	Review email from Tom Sand re settlement discussions and related emails
01/12/23	L. Giles	5.5	Review documents relating to Wendi Hamann to prepare for deposition (5.3); virtual meeting with Edward Decker re upcoming third-party depositions (.2)
01/12/23	T. Sand	0.9	Email Clyde Hamstreet and Hannah Schmidt re settlement discussions and related emails (.3); review key documents for trial strategy (.6)
01/12/23	B. Shattuck	1.7	Review discovery materials for research project
01/12/23	M. Tyler	3.1	Begin drafting summary of Greg Usselman deposition
01/12/23	J. Vance	0.2	Telephone call with Edward Decker re depositions
01/13/23	E. Decker	6.2	Prepare for and appear at deposition of Suzanne Nichols (3.5); prepare for and appear at deposition of Maureen Wile (2.7)



<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
01/13/23	T. Sand	0.4	Review and assess defendant's new request for time (.1); review notice of deposition from Pacific Premier Bank (.1); email to Joseph Vance and Edward Decker re settlement negotiations (.2)
01/13/23	B. Shattuck	1.3	Continue review of discovery materials for research project
01/13/23	M. Tyler	3.7	Continue drafting summary of Greg Usselman deposition
01/15/23	B. Shattuck	2.1	Review materials for trial for Joseph Vance
01/16/23	B. Shattuck	2.0	Review materials for trial for Joseph Vance
01/17/23	H. Harmon	0.1	Prepare deposition transcript, exhibits, and video of Monte Schwartz for attorney review
01/17/23	L. Peterson	0.3	Organize deposition transcript of Monte Schwartz and update trial transcript index (.1); email to Mark Tyler re same (.1); emails with Heather Harmon re deposition video (.1)
01/17/23	B. Shattuck	5.0	Review materials for trial for Joseph Vance
01/17/23	M. Tyler	3.3	Continue drafting summary of Greg Usselman deposition
01/18/23	E. Decker	0.1	Emails with Lisa Peterson re Hamstreet documents
01/18/23	L. Peterson	4.2	Review email from Kristin Asai re custodian issue and review December 2022 production from database with respect to same (.5); email to Joseph Vance and Edward Decker re same (.1); continue to review and analyze Hamstreet documents for privilege and responsiveness to discovery requests (3.1); emails with Edward Decker re Hamstreet documents (.5)
01/18/23	T. Sand	1.9	Review and analyze deposition of Greg Usselman (1.2); review status of document production and new set of interrogatories from defendants (.3); research evidence (.4)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
01/18/23	B. Shattuck	6.0	Review discovery materials re production and email with Joseph Vance re same (.7); review materials for trial for Joseph Vance (5.3)
01/18/23	M. Tyler	5.2	Draft summary of Michael Roberts depositions (4.2); revise and edit summary of Greg Usselman deposition (1.0)
01/19/23	E. Decker	0.8	Virtual meeting with Clyde Hamstreet, Hannah Schmidt, Tom Sand, and Joseph Vance re litigation strategy update
01/19/23	L. Giles	7.7	Review documents and draft deposition outline for Wendi Hamann deposition
01/19/23	H. Harmon	0.4	Update case file and docketing with third set of discovery requests from Pacific Premier Bank and Riverview Bank, and prepare responsive pleadings
01/19/23	T. Sand	3.1	Virtual meeting with Clyde Hamstreet, Hannah Schmidt, Joseph Vance, and Edward Decker re litigation strategy update (.8); review deposition transcripts in preparation for trial presentation (2.0); analyze strategy for admission of evidence re fifth amended refusal to testify (.3)
01/19/23	B. Shattuck	6.4	Review materials for trial for Joseph Vance
01/19/23	M. Tyler	3.4	Draft summary of Michael Robert's second deposition (2.6); revise and edit summary of Michael Roberts deposition (.8)
01/19/23	J. Vance	0.8	Virtual meeting with Clyde Hamstreet, Hannah Schmidt, Tom Sand, and Edward Decker re litigation strategy update
01/20/23	E. Decker	0.2	Conference with Joseph Vance re strategy for depositions for week of January 23
01/20/23	L. Giles	7.3	Review documents for Wendi Hamann deposition and revise outline
01/20/23	H. Harmon	0.2	Compile declarations submitted for filing in receivership and adjunct lawsuits for attorney review in preparation for depositions

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
01/20/23	T. Sand	1.7	Review deposition summary (1.4); review status of trial plan (.3)
01/20/23	B. Shattuck	3.9	Review materials for trial for Joseph Vance
01/20/23	M. Tyler	3.5	Draft summary of Teresa Nagel deposition (3.2); revise and edit summary of Teresa Nagel deposition (.3)
01/20/23	J. Vance	0.2	Conference with Edward Decker re strategy for upcoming depositions
01/22/23	B. Shattuck	2.3	Review materials for trial for Joseph Vance
01/23/23	E. Decker	4.6	Correspond with counsel for Riverview Bank re upcoming deposition (.1); prepare for deposition of Wendi Hamann (.5); conference with Lorien Giles re discovery matters (.2); draft deposition preparation materials for Hannah Schmidt (.6); meeting with Hannah Schmidt and Joseph Vance re depositions, interrogatories, and discovery responses (3.2)
01/23/23	D. Foraker	0.1	Emails re cancellation of 1/23 bi-monthly meeting with AEM investors' counsel
01/23/23	L. Giles	0.2	Conference with Edward Decker re discovery matters
01/23/23	L. Peterson	4.9	Continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests (3.9); emails with Edward Decker re Hamstreet emails (.2); emails with Streamline Imaging re search requests (.3); emails with Martha Cohn re settlement statements for property sold in receivership (.5)
01/23/23	T. Sand	0.4	Review letter from Shannon Armstrong re expert discovery (.2); analyze email from Chip Paternoster re extension of deadline to complete discovery (.2)
01/23/23	B. Shattuck	7.1	Review materials for trial for Joseph Vance
01/23/23	J. Vance	4.5	Meeting with Hannah Schmidt and Edward Decker (3.2); analyze new discovery requests (1.3)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
01/24/23	E. Decker	8.0	Prepare for and appear at deposition of Wendi Hamann
01/24/23	H. Harmon	0.3	Prepare deposition transcripts for review by expert by ShareFile
01/24/23	L. Peterson	4.5	Continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests (4.3); communications with Edward Decker and Lorien Giles re Pacific Premier's subpoena to Wendi Hamann (.2)
01/24/23	T. Sand	2.7	Analyze settlement strategy re Riverview Bank (.3); review case materials and begin preparations for jury presentation (2.4)
01/24/23	B. Shattuck	6.0	Review materials for trial for Joseph Vance
01/24/23	J. Vance	0.7	Telephone call with Hannah Schmidt re discovery (.3); analyze documents for discovery (.4)
01/25/23	E. Decker	4.5	Prepare for and appear at deposition of David Saathoff (in part) (2.6); revise draft supplemental interrogatory responses re damages (1.2); virtual meeting with Lorien Giles re supplemental interrogatory responses (.2); draft analysis documents re Riverview Bank and key players (.5)
01/25/23	L. Giles	4.1	Draft supplemental interrogatory responses (3.9); virtual meeting with Edward Decker re supplemental interrogatory responses (.2)
01/25/23	L. Peterson	2.1	Continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests
01/25/23	B. Shattuck	7.0	Review materials for trial for Joseph Vance (5.4); research procedure for admitting deposition testimony when deponent pleads the Fifth Amendment privilege (1.6)
01/25/23	M. Tyler	0.7	Appear at deposition of David Saathoff (in part)
01/26/23	E. Decker	2.1	Draft analysis documents re Riverview Bank and key players (.9); virtual meeting with Lisa Peterson re document review and production (.4); final review of production of damages support data (.5); draft correspondence with opposing counsel (.3)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
01/26/23	L. Giles	3.4	Revise supplemental interrogatory responses
01/26/23	L. Peterson	3.1	Review email communications from Hannah Schmidt re documents (.2); virtual meeting with Edward Decker re document review and production (.4); organize damages documents, prepare instructions for inclusion and production of same from electronic database, and prepare ShareFile (1.0); continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests (1.5)
01/26/23	T. Sand	4.0	Review and analyze expert reports, prepare list of potential witnesses, prepare list of potential demonstrative exhibits, and begin planning opening statement
01/26/23	B. Shattuck	6.0	Review materials for trial for Joseph Vance (5.1); research procedure for admitting deposition testimony at trial and draft research memorandum re same (.9)
01/26/23	M. Tyler	1.7	Draft summary of Monte Schwartz deposition
01/27/23	E. Decker	1.9	Telephone call with Hannah Schmidt re additional analysis for damages interrogatories (.3); revise draft interrogatory responses (1.0); draft analysis of key individuals at banks and AEI (.6)
01/27/23	L. Peterson	3.2	Emails with Jacqueline Ritchier re DFI production (.1); download and organize DFI production and prepare instructions for inclusion of same in electronic databases (.8); emails with Sarah Houser at Streamline Imaging re same (.1); continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests (2.2)
01/27/23	T. Sand	3.5	Continue review of expert witness reports, prepare trial strategy, analyze admissibility of evidence for jury trial, and review email to counsel re document production and depositions

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
01/27/23	B. Shattuck	6.3	Review materials for trial for Joseph Vance (5.8); draft research memorandum re admitting deposition testimony at trial (.5)
01/28/23	J. Vance	1.5	Review and revise discovery responses
01/29/23	L. Peterson	1.0	Continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests
01/30/23	E. Decker	1.5	Conference with Lisa Peterson re final questions on review of Hamstreet documents (.8); virtual meetings with Joseph Vance re document review, depositions, and expert reports (.2); virtual meeting with Lorien Giles re updates to interrogatory responses (.1); draft responses to interrogatories on damages (.4)
01/30/23	L. Giles	3.2	Virtual meeting with Edward Decker re updates to interrogatory responses (.1); update supplemental interrogatory responses (.3); review new interrogatories and requests for production from banks (1.3); draft responses to interrogatories and requests for production (1.5)
01/30/23	H. Harmon	0.3	Compile documents for preparation of Tami Nesburg deposition exhibits
01/30/23	L. Peterson	7.5	Continue to review and analyze Hamstreet documents for privilege and responsiveness to discovery requests (6.7); conference with Edward Decker re final questions on review of Hamstreet documents (.8)
01/30/23	B. Shattuck	2.3	Review materials for trial for Joseph Vance
01/30/23	J. Vance	3.5	Virtual meeting with Edward Decker (.2); prepare for deposition (3.3)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
01/31/23	E. Decker	4.2	Virtual meeting with Joseph Vance, Tom Sand, Lorien Giles, Lisa Peterson, Ben Shattuck, and Mark Tyler re written discovery, document productions, depositions, expert reports, and trial preparation (.6); communications with Lisa Peterson re production of documents from Hamstreet collection (.2); virtual meeting with Lorien Giles re responses to damages interrogatories from bank defendants (.5); analyze proposed production of Hamstreet emails and files (1.4); telephone call with Hannah Schmidt re Rule 30(b)(6) deposition (.3); revise draft interrogatory responses to Pacific Premier Bank (.5); correspond with Riverview Bank counsel re Rule 30(b)(6) deposition (.1); draft responses to damages interrogatories and requests for production from bank defendants (.6)
01/31/23	L. Giles	2.2	Virtual meeting re written discovery, document productions, depositions, expert reports, and trial preparation (.6); revise supplemental interrogatory responses (1.6)
01/31/23	H. Harmon	0.5	Assist with preparation of potential deposition exhibits for use during deposition of Tami Nesburg, including attorney working notebook
01/31/23	L. Peterson	4.9	Communications with Edward Decker re Hamstreet email production preparations (.2); virtual meeting with Joseph Vance, Tom Sand, Lorien Giles, Edward Decker, Ben Shattuck, and Mark Tyler re written discovery, document productions, depositions, expert reports, and trial preparation (.6); continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests (2.8); communications with Edward Decker and Lorien Giles re damages documents (.2); update spreadsheet of settlement statements (.4); email to Streamline Imaging with instructions for first production of Hamstreet emails for Pacific Premier Bank's October 2022 search terms (.3); update document index (.2); emails with Sarah Houser re production (.2)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
01/31/23	T. Sand	0.7	Virtual meeting with Joseph Vance, Lorien Giles, Edward Decker, Ben Shattuck, Lisa Peterson, and Mark Tyler re written discovery, document production, depositions, expert reports, and trial preparation (.6); email Chip Paternoster re depositions (.1)
01/31/23	B. Shattuck	1.6	Virtual meeting with Joseph Vance, Tom Sand, Edward Decker, Lorien Giles, Lisa Peterson, and Mark Tyler re written discovery, document productions, depositions, expert reports, and trial preparation (.6); review materials for trial for Joseph Vance (1.0)
01/31/23	M. Tyler	5.9	Draft summary of Monte Schwartz deposition (4.8); virtual meeting with Joseph Vance, Tom Sand, Lorien Giles, Lisa Peterson, Ben Shattuck, and Edward Decker re written discovery, document productions, depositions, expert reports, and trial preparation (.6); revise and edit summary of Monte Schwartz deposition (.5)
01/31/23	J. Vance	8.5	Virtual meeting with Tom Sand, Edward Decker, Lorien Giles, Lisa Peterson, Ben Shattuck and Mark Tyler (.6); prepare for depositions (7.9)

**Fee Summary**

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
T. Sand	Partner	32.2	\$865	\$27,853.00
D. Foraker	Partner	2.1	685	1,438.50
J. Vance	Partner	43.8	580	25,404.00
E. Decker	Partner	78.8	505	39,794.00
L. Giles	Associate	72.6	425	30,855.00
M. Tyler	Associate	35.5	395	14,022.50
B. Shattuck	Associate	72.5	370	26,825.00
C. McCoy	Paralegal	0.3	305	91.50
L. Peterson	Paralegal	57.8	305	17,629.00
H. Harmon	Paralegal	2.4	245	588.00
<b>Summary Total:</b>		<b>398.0</b>		<b>\$184,500.50</b>



**Disbursement Summary**

<b><u>Disbursements</u></b>	<b><u>Amount</u></b>
Streamline Imaging (ACH); Invoice#: 37179; Relativity search services for Dec 2022	9,382.75
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6306511; Transcript services for Lynn Barnett deposition	1,169.85
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6303488; Transcript services for David Foraker deposition	1,135.40
Naegeli Deposition and Trial; Invoice#: 18209; Court reporter and videographer services for Monte Schwartz deposition	2,981.00
Naegeli Deposition and Trial; Invoice#: 18210; Court reporter and videographer services for Monte Schwartz deposition	2,170.00
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6311428; Transcript services for Clyde A Hamstreet deposition	1,378.20
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6315719; Transcript services for Barbara Jacobs deposition	1,231.00
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6315916; Transcript services for Miles Minsker deposition	709.25
Naegeli Deposition and Trial; Invoice#: 17260; Original transcript services for Teresa Nagel deposition	1,363.40
Naegeli Deposition and Trial; Invoice#: 17309; Original transcript services for Michael Roberts deposition	1,109.15
Naegeli Deposition and Trial; Invoice#: 17310; Videographer services for Michael Roberts deposition	920.00
Naegeli Deposition and Trial; Invoice#: 17261; Videographer services for Teresa Nagel deposition	1,020.00
<b>Disbursement Total:</b>	<b>\$24,570.00</b>

**Invoice Summary**

Professional Fees Through January 31, 2023	\$184,500.50
Disbursements	<u>\$24,570.00</u>
<b>Amount Due - Current Period:</b>	<b><u>\$209,070.50</u></b>

# EXHIBIT C

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  
January 2023 Services

Date	Description	Person	Hours	Rate	Amount
1/4/2023	Review of correspondence	MU	0.3	450.00	\$ 135.00
1/5/2023	Review, edit, and finalize report	MU	1.5	450.00	675.00
1/9/2023	Report and file administration	MU	0.5	450.00	225.00
1/24/2023	Call with HS	MU	0.3	450.00	<u>135.00</u>
	<b>Total Fees</b>				<b><u>\$ 1,170.00</u></b>

# EXHIBIT D



# Job Costs

Costs dated from 01/01/23 to 01/31/23 and client AEM

02/08/23 9:26 AM  
(TY)

## AEM-003 (Microsite Updates & Maintenance)

Date:	Who:	Number:		Hours:	Cost:	Gross:	Status:
<b>ACCT / Account Services</b>							
01/13/23	NK	400402	<i>Time</i>	0.40	--	\$ 70.00	<i>Billed</i>
	<i>Document upload</i>						
01/31/23	NK	401872	<i>Time</i>	0.40	--	\$ 70.00	<i>Billed</i>
	<i>Document upload</i>						
<b>ACCT Subtotal:</b>				<b>0.80</b>	<b>--</b>	<b>\$ 140.00</b>	
<b>HOST / Website Hosting</b>							
01/31/23	HOST	402295	<i>Int Charge</i>	--	\$ 400.00		<i>Billed</i>
	<i>2023 Annual website hosting fee</i>						
<b>HOST Subtotal:</b>					<b>\$ 400.00</b>		
<b>AEM-003 TOTAL</b>				<b>0.80</b>	<b>\$ 400.00</b>	<b>\$ 140.00</b>	



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

<b>Number</b>	14975
<b>Date</b>	01/31/23
<b>Job Number</b>	AEM-003
<b>PO#</b>	--
<b>Charge#</b>	--

**Job Name:** Microsite Updates & Maintenance

**Agency Contact** Brian Gard

**Description:** For Professional Services Rendered Through January, 2023:

Description	Hours Billed	Amount
Account Services	0.80	\$140.00
<b>Professional Services Subtotal:</b>	<b>0.80</b>	<b>\$140.00</b>
Website Hosting		\$400.00
<b>Interactive Subtotal:</b>		<b>\$400.00</b>
<b>TOTAL:</b>	<b>0.80</b>	<b>\$540.00</b>

**PAYMENT TERMS:** net 30 days



# Invoice Detail Report

Invoice : 14975 Client : Hamstreet & Associates - AEM (AEM)

02/08/23 9:23 AM  
(TY)

Reference:	Date:	Vendor/Staff:	Hours:	Billed:	
<b>AEM-003</b>	<b>Microsite Updates &amp; Maintenance</b>				
<b>Account Services:</b>			<b>Rate</b>	<b>Hrs</b>	<b>Amount</b>
400402	01/13/23	NK Naureen Khan <i>Document upload</i>	\$175.00	0.40	\$70.00
401872	01/31/23	NK Naureen Khan <i>Document upload</i>	\$175.00	0.40	\$70.00
				<b>0.80</b>	<b>\$140.00</b>
<b>Website Hosting:</b>			<b>Rate</b>	<b>Hrs</b>	<b>Amount</b>
402295	01/31/23	HOST 2023 Annual website hosting fee	\$0.00		
				<b>0.80</b>	<b>\$140.00</b>
		<b>AEM-003 TOTAL</b>		<b>0.80</b>	<b>\$140.00</b>
		<b>INVOICE #14975 TOTAL:</b>		<b>0.80</b>	<b>\$140.00</b>

# EXHIBIT E



**Rosen Law, S.C.**  
 Plaza Los Portales Local 205  
 San Jose del Cabo, Baja California Sur  
 Mexico 23406



**Clyde A. Hamstreet & Associates, LLC, as AEM**

**Receiver**

Att'n: Mr. Clyde A. Hamstreet  
 One SW Columbia Street, Suite 1575  
 Portland, OR 97258  
 United States  
 Phone: 503.224.5858

PRE-BILL

<b>Invoice Date</b>	<b>Invoice Number</b>
01/31/2023	22537
<b>Terms</b>	<b>Service Through</b>
	01/31/2023

<b>In Reference To: EAST CAPE G&amp;A (Legal fees)</b>					
<b>Date</b>	<b>By</b>	<b>Services</b>	<b>Hours</b>	<b>Rates</b>	<b>Amount</b>
12/02/2022	BR	<b>Communications:</b> notary, internal re: mar de Plata trust deed recording; atny Abril re: model PTT.	0.40	\$ 350.00/hr	\$ 140.00

**Total Hours** 0.40 hrs  
**Total Legal fees** \$ 140.00  
**Total Amount** \$ 140.00

<b>In Reference To: General (Legal fees)</b>					
<b>Date</b>	<b>By</b>	<b>Services</b>	<b>Hours</b>	<b>Rates</b>	<b>Amount</b>
11/30/2022	BR	Local Management & Banking Support (AEMEMMX S DE RL DE CV) Dec & Jan, 2022	Flat Fee	\$ 440.00	\$ 440.00
12/01/2022	IM	follow up on correction to public deeds, email to public notary re. same	0.15	\$ 130.00/hr	\$ 19.50
12/12/2022	BR	<b>Follow up:</b> client, Ivan re: audit/advisory proposal.	0.25	\$ 350.00/hr	\$ 87.50
12/31/2022	BR	Local Management & Banking Support (AEMEMMX S DE RL DE CV) Dec, 2022	Flat Fee	\$ 220.00	\$ 220.00
01/05/2023	BR	<b>Email:</b> Hannah re: pending matters.	0.25	\$ 350.00/hr	\$ 87.50
01/06/2023	BR	<b>Meeting:</b> notary to execute Tamar deed. Review and respond to correspondence.	0.50	\$ 350.00/hr	\$ 175.00
01/10/2023	BR	<b>Conference call:</b> Hannah, Ingrid, Vero re: diverse pending matters/PSA template, etc., Centeno engagement.	0.65	\$ 350.00/hr	\$ 227.50
01/12/2023	JB	<b>Velazquez, Daniela re::</b> Tamar 200 closing coordination and funds disbursement	2.00	\$ 100.00/hr	\$ 200.00

01/23/2023	BR	<b>Conference call:</b> Alex Centeno and Salvador re tax treatment of Mar de Plata trust; prep for meeting; forward docs; send summary email to client.	1.00	\$ 350.00/hr	\$ 350.00
01/24/2023	BR	<b>Communications:</b> Client, Jeffrey Curtiss re: Hines/El Coyote title/survey.	0.50	\$ 350.00/hr	\$ 175.00

**Total Hours** 5.30 hrs  
**Total Legal fees** \$ 1,982.00  
**Total Amount** \$ 1,982.00

<b>In Reference To: Mar de Plata (Legal fees)</b>					
<b>Date</b>	<b>By</b>	<b>Services</b>	<b>Hours</b>	<b>Rates</b>	<b>Amount</b>
12/01/2022	AR	<b>Rodriguez, Abril re::</b> Study Administration Trust	0.50	\$ 140.00/hr	\$ 70.00
12/01/2022	AR	<b>Rodriguez, Abril re::</b> Coordinate w/Public Notary complete file.	1.00	\$ 140.00/hr	\$ 140.00
12/01/2022	AR	Study Mar Plat Lot 11, verify payments.	1.00	\$ 140.00/hr	\$ 140.00
12/07/2022	AR	<b>Rodriguez, Abril re::</b> Study Rectifying Act Mar Plata	1.50	\$ 140.00/hr	\$ 210.00
12/07/2022	BR	<b>Communications:</b> Hannah re: escrow requirement/Jim Hart. Follow up Ivan from Gossler.	0.50	\$ 350.00/hr	\$ 175.00
12/13/2022	AR	<b>Rodriguez, Abril re::</b> Call Mifel about issues Mar Plata's clients processing payments (Cristina Montoya, Jim Hart & Jonh Cavanaugh)	0.45	\$ 140.00/hr	\$ 63.00
12/13/2022	AR	<b>Rodriguez, Abril re::</b> Draft & send email Mifel Mar Plata's client payment not reflected (Cristina Montoya)	0.20	\$ 140.00/hr	\$ 28.00
12/16/2022	AR	<b>Rodriguez, Abril re::</b> Send MD Package collect BR signature Adobe Sign; send email reminder confirming second deposit.	0.60	\$ 140.00/hr	\$ 84.00
12/16/2022	AR	<b>Rodriguez, Abril re::</b> Review ongoing sales digital files; gather payment receipts; send reminder MD Package Lot 21 Sherry Jensen.	1.60	\$ 140.00/hr	\$ 224.00
12/27/2022	AR	<b>Rodriguez, Abril re::</b> Check MDP 19 Jim Hart's PPT; send reminder to gather his signature.	0.35	\$ 140.00/hr	\$ 49.00
12/28/2022	IM	internal meeting to discuss next steps and work plan: discussions on pendings	0.25	\$ 130.00/hr	\$ 32.50
01/10/2023	IM	Call re. general pendings, closings, trust, spanish version of PTT	0.55	\$ 130.00/hr	\$ 71.50
01/11/2023	BR	<b>Communications:</b> Conference call with Mifel and Gloria re: bank account management and permissions. Phone call Sal re: 2022 tax matters and Centeno engagement.	0.50	\$ 350.00/hr	\$ 175.00
01/13/2023	IM	Call wHannah re: Hart, forms update, Spanish version	0.40	\$ 130.00/hr	\$ 52.00
01/13/2023	BR	<b>Communications:</b> Hannah re: Hart, forms update, etc.	0.20	\$ 350.00/hr	\$ 70.00

**Total Hours** 9.60 hrs

**Total Legal fees** \$ 1,584.00  
**Total Amount** \$ 1,584.00

<b>Total Hours</b>	15.30 hrs
<b>Total Legal fees</b>	\$ 3,706.00
<b>Total Invoice Amount</b>	\$ 3,706.00

**Notes:**

Thank you in advance for your prompt payment.

# EXHIBIT F

**CROWLEY  
FLECK** PLLP  
ATTORNEYS

Invoice Date: February 07, 2023  
 Invoice Number: 995207  
 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	\$1,622.50
Current Disbursements	\$0.00
<b>Current Balance Due</b>	<b>\$1,622.50</b>

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
01/02/2023	GS2	Review County Planner protocols for retracements; ensure DNRC filings; confer with Planner.	1.20	\$354.00
01/03/2023	GS2	Conferences with surveyor regarding County planner requirements.	0.60	\$177.00
01/05/2023	GS2	Review status of plat with planner and surveyor; conference with title company regarding insurability.	1.30	\$383.50
01/10/2023	GS2	Conference with surveyor; conference with title company; conference with County planner.	0.90	\$265.50
01/27/2023	GS2	Check on status of closing.	0.30	\$88.50
01/30/2023	GS2	Check on status of plat with surveyor and recorder; review plat; conference with title agent regarding updating Commitment; correspondence to client.	1.20	\$354.00
Total Professional Services			5.50	\$1,622.50
<b>Total Due Current Invoice</b>				<b>\$1,622.50</b>

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](http://www.crowleyfleck.com) | 406-255-7207