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Scott G. Weber, Clerk
Clark County

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SUPERIOR COURT OF WASHINGTON FOR CLARK COUNTY

8

9 In re:

Case No. 19-2-01458-06

10 AMERICAN EAGLE MORTGAGE 100,
11 LLC; AMERICAN EAGLE MORTGAGE
12 200, LLC; AMERICAN EAGLE
13 MORTGAGE 300, LLC; AMERICAN
14 EAGLE MORTGAGE 400, LLC;
15 AMERICAN EAGLE MORTGAGE 500,
16 LLC; AMERICAN EAGLE MORTGAGE
17 600, LLC; AMERICAN EAGLE
18 MORTGAGE MEXICO 100, LLC;
19 AMERICAN EAGLE MORTGAGE
20 MEXICO 200, LLC; AMERICAN EAGLE
21 MORTGAGE MEXICO 300, LLC;
22 AMERICAN EAGLE MORTGAGE
23 MEXICO 400, LLC; AMERICAN EAGLE
24 MORTGAGE MEXICO 500, LLC;
25 AMERICAN EAGLE MORTGAGE
26 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 (FEBRUARY 2023)

20

21 TO: AMERICAN EAGLE MORTGAGE 100 LLC; AMERICAN EAGLE
22 MORTGAGE 200, LLC; AMERICAN EAGLE MORTGAGE 300, LLC;
23 AMERICAN EAGLE MORTGAGE 400, LLC; AMERICAN EAGLE
24 MORTGAGE 500, LLC; AMERICAN EAGLE MORTGAGE 600, LLC;
25 AMERICAN EAGLE MORTGAGE MEXICO 100, LLC; AMERICAN EAGLE
26 MORTGAGE MEXICO 200, LLC; AMERICAN EAGLE MORTGAGE
MEXICO 300, LLC; AMERICAN EAGLE MORTGAGE MEXICO 400, LLC;
AMERICAN EAGLE MORTGAGE MEXICO 500, LLC; AMERICAN EAGLE
MORTGAGE MEXICO 600, LLC; AMERICAN EAGLE MORTGAGE I, LLC;
AMERICAN EAGLE MORTGAGE II, LLC; and AMERICAN EAGLE
MORTGAGE SHORT TERM, LLC;

AND TO: Parties requesting special notice.

RECEIVER'S NOTICE OF INTENT TO COMPENSATE
(FEBRUARY 2023) - 1

4891-1499-4004.1

MILLER NASH LLP
ATTORNEYS AT LAW
T: 206.624.8300 | F: 206.340.9599
PIER 70
2801 ALASKAN WAY, SUITE 300
SEATTLE, WASHINGTON 98121

1 Clyde A. Hamstreet & Associates, LLC, the duly appointed general receiver herein (the
2 “Receiver”), submits the Receiver’s Notice of Intent to Compensate (February 2023) in
3 accordance with Paragraph 11 of the Order Appointing General Receiver dated May 10, 2019
4 (the “Receivership Order”), which provides in part: “The Receiver and the Receiver’s authorized
5 attorneys and other professionals may request to be compensated on an interim or final basis.”

6 RCW 7.60.180(4) further provides:

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

12 Attached as Exhibit A hereto is a true and correct copy of the Receiver’s time and
13 expense summary for services and costs in February 2023. For this period, the Receiver requests
14 final approval of its compensation in the amount of \$45,061.50 and reimbursement of no costs,
15 for a total payment of \$45,061.50.

16 Attached as Exhibit B hereto is a true and correct copy of the time and expense summary
17 of the Receiver’s authorized attorneys, Miller Nash LLP, for services and costs in February
18 2023. For this period, such attorneys request final approval of their compensation in the amount
19 of \$198,242.00 and reimbursement of costs of \$15,172.61, for a total payment of \$213,414.61.

20 Attached as Exhibit C hereto is a true and correct copy of the time and expense summary
21 of the Receiver’s authorized forensic accountant Michael G. Ueltzen, CPA, for services and costs
22 in February 2023. For this period, such forensic accountant requests final approval of his
23 compensation in the amount of \$3,195.00 and reimbursement of no costs, for a total payment of
24 \$3,195.00.

25 Attached as Exhibit D hereto is a true and correct copy of the time and expense summary
26 of the Receiver’s authorized public communications consultants, Gard Communications, Inc., for

1 services and costs in February 2023. For this period, such consultants request final approval of
2 their compensation in the amount of \$131.25 and reimbursement of no costs, for a total payment
3 of \$131.25.

4 Attached as Exhibit E hereto is a true and correct copy of the time and expense summary
5 of the Receiver's authorized special counsel in Mexico, Rosen Law, S.C., for services and costs
6 in February 2023. For this period, such attorneys request final approval of their compensation in
7 the amount of \$4,240.00 and reimbursement of no costs, for a total payment of \$4,240.00.

8 Unless objections to the foregoing requests are filed with the Court and served on the
9 undersigned attorneys so as to be received by March 23, 2023, the Receiver may make the
10 payments requested herein and/or the professionals may apply their retainers, if any.

11 DATED this 10th day of March, 2023.

12 MILLER NASH LLP

13
14 /s/ John R. Knapp, Jr.

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

16 Attorneys for Receiver
17 Clyde A. Hamstreet & Associates, LLC

EXHIBIT A



HAMSTREET

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

March 8, 2023

Invoice # 2595

Professional Services

			<u>Hours</u>	<u>Amount</u>
2/1/2023	MC	Litigation Support Research per direction of Hannah Schmidt.	2.20	352.00
	HS	Litigation Support Attend Nesberg deposition.	6.20	3,100.00
	HS	Litigation Support Discussion with Joe Vance deposition preparation.	0.40	200.00
2/2/2023	MC	Litigation Support Research per direction of Hannah Schmidt.	1.00	160.00
	MC	Litigation Support Research per direction of Hannah Schmidt.	3.10	496.00
	HS	Litigation Support Call with Mike Ueltzen regarding production.	1.00	500.00
	HS	Litigation Support Call with Joe Vance regarding deposition preparation. Follow up work regarding same.	6.00	3,000.00
2/3/2023	MC	Receivership Duties Start Evergreen reconciliation and payment histories for January.	2.30	368.00
	HS	Pacific Premier Bank Prepare for and be deposed.	8.00	4,000.00
2/6/2023	MC	Receivership Duties Call payer about check. Update data tape and payment histories.	1.90	304.00
	MC	Litigation Support Research per direction of Hannah Schmidt.	1.30	208.00
	HS	Pacific Premier Bank Prepare for and be deposed.	8.00	4,000.00

			<u>Hours</u>	<u>Amount</u>
2/7/2023	MC	Receivership Duties Talk to investor about transferring claim.	0.50	80.00
	MC	Receivership Duties Finish evergreen reconciliation.	2.00	320.00
	HS	Pacific Premier Bank Prepare for and be deposed. Review and sign interrogatory responses.	7.00	3,500.00
2/8/2023	MC	Receivership Duties Process checks and enter to Quickbooks.	1.30	208.00
	MC	Litigation Support Research per direction of Hannah Schmidt.	2.00	320.00
	CAH	Receivership Duties Review invoices and sign checks; check with Martha on survey invoice; talk with Joe Vance regarding depositions.	0.90	562.50
2/9/2023	MC	Litigation Support Pool financial summaries.	1.10	176.00
	MC	Litigation Support Scan and organize documents for production.	3.60	576.00
	CAH	Receivership Duties Discuss case depositions with Dave Foraker.	0.30	187.50
	HS	Litigation Support Calls with SEC and Joe Vance.	0.50	250.00
2/10/2023	MC	Receivership Duties Organize, notarize and mail McQuahae property documents.	0.50	80.00
	MC	Receivership Duties Re-issue 1099.	0.70	112.00
	MC	Receivership Duties Finalize and submit loan modification agreement. Update Quickbooks entries.	1.10	176.00
	MC	Litigation Support Scan and organize documents for production.	2.00	320.00
2/11/2023	CAH	Receivership Duties Travel to Manzanita, OR to look over reclaimed house and lot and get a sense for valuations.	2.00	1,250.00
2/13/2023	MC	Litigation Support Finish saving and reviewing scans for production.	0.50	80.00
	MC	Receivership Duties Compile Nehalem property and city code information.	0.70	112.00

		<u>Hours</u>	<u>Amount</u>
2/13/2023	MC	Litigation Support Research per direction of Hannah Schmidt.	0.60 96.00
	MC	Receivership Duties Enter checks; take call from investor.	1.00 160.00
2/14/2023	MC	Litigation Support Research per direction of Hannah Schmidt.	1.30 208.00
2/15/2023	MC	Receivership Duties Look into document recording for McQuahae.	0.50 80.00
	MC	Litigation Support Research per direction of Hannah Schmidt. Upload documents for production.	2.10 336.00
	HS	Receivership Duties Read and respond to emails from when I was out of town.	0.50 250.00
	HS	Receivership Duties Emails regarding Mar de Plata lots 11, 12 and 16.	0.50 250.00
2/16/2023	MC	Litigation Support Research per direction of Hannah Schmidt.	1.20 192.00
	CAH	Receivership Duties Discuss case with Hannah Schmidt covering litigation progress; Nehalem property appraisal; Mexico assets and general progress of case.	0.60 375.00
	HS	Receivership Duties Call regarding Mexico real estate.	0.50 250.00
	HS	Receivership Duties Emails with Jim Hart and Karen O'Sullivan regarding Mar de Plata.	0.50 250.00
	HS	Litigation Support Read responses to motion to compel and rogs.	1.30 650.00
	HS	Receivership Duties Discuss case status with Clyde Hamstreet.	0.60 300.00
2/17/2023	MC	Litigation Support Prepare contract accounting documents for PPB production request.	2.10 336.00
	CAH	Receivership Duties Update with Hannah Schmidt on depositions and collection of materials requested by bank's attorneys. Update from Veronica Hamstreet on Mexico team.	0.60 375.00
	HS	Receivership Duties Emails regarding Mar de Plata.	0.50 250.00

			<u>Hours</u>	<u>Amount</u>
2/17/2023	HS	Pacific Premier Bank Coordinate request for contract information from PPB.	1.00	500.00
	HS	Litigation Support Respond to questions from Joe Vance.	1.50	750.00
2/20/2023	CAH	Receivership Duties Meeting with legal counsel on status of case. Follow up discussions with Hannah Schmidt.	1.30	812.50
	HS	Receivership Duties Review cash position.	0.20	100.00
	HS	Litigation Support Call with Miller Nash team and Clyde Hamstreet. Follow up call with Clyde Hamstreet.	1.00	500.00
	HS	Litigation Support Review draft Stoley report.	1.00	500.00
2/21/2023	MC	Receivership Duties Review and speak with property appraisers for AEM.	0.70	112.00
	MC	Receivership Duties Emails on cleaning up AEM records, investor transfers, and tracking down returned mail.	0.80	128.00
	HS	Litigation Support Calls with Joe Vance and email files to Joe regarding motion to compel.	0.40	200.00
	HS	Litigation Support Review draft Stoley report.	2.90	1,450.00
	HS	Receivership Duties Discussion with Veronica Hamstreet regarding Todos Santos. Emails regarding Mar de Plata.	0.50	250.00
2/22/2023	MC	Receivership Duties Go to post office.	0.50	80.00
	CAH	Receivership Duties Participate in call with Valerio Gonzalelz, Veronica Hamstreet and Hannah Schmidt regarding Todos Santos property and claim of adverse possessions by adjacent farmer. Review survey work and photos of La Paz property.	0.60	375.00
	HS	Receivership Duties Emails regarding Mar de Plata.	0.50	250.00
	HS	Litigation Support Review draft Stoley report.	6.50	3,250.00

			<u>Hours</u>	<u>Amount</u>
2/22/2023	HS	Receivership Duties Call with Valerio Gonzalez, Clyde Hamstreet, Veronica Hamstreet and Evelyn Torres regarding Todos Santos.	0.60	300.00
2/23/2023	MC	Receivership Duties Correspondence with appraisers.	0.50	80.00
	HS	Receivership Duties Emails regarding mar de plata.	0.20	100.00
	HS	Litigation Support Review draft Stoley report.	2.00	1,000.00
	HS	Receivership Duties Emails regarding Mar de Plata.	0.20	100.00
2/24/2023	MC	Receivership Duties Draft demand letters to delinquent payers.	2.50	400.00
	HS	Receivership Duties Emails regarding Mar de Plata.	0.30	150.00
2/27/2023	MC	Receivership Duties Notarize, prepare and mail Mexico documents for Apostillization.	0.80	128.00
	MC	Receivership Duties Process checks and update Quickbooks.	0.80	128.00
	CAH	Receivership Duties Sign mortgage release documents for Mexico for notary. Conference call with Hannah Schmidt regarding damage claims by banks; participate in call with Joe Vance, Edward Decker and Hannah Schmidt regarding banks damage claims, summary judgements and other litigations maters.	1.20	750.00
	HS	Litigation Support Calls with Clyde Hamstreet regarding expert reports.	0.20	100.00
	HS	Receivership Duties Read and respond to emails.	0.30	150.00
	HS	Litigation Support Call with Joe Vance, Edward Decker and Clyde Hamstreet regarding damage reports.	0.70	350.00
	HS	Litigation Support Review damages reports. Research specific points in quickbooks.	3.90	1,950.00
2/28/2023	MC	Receivership Duties Enter and print checks. Finish processing checks and updating records.	1.10	176.00
	MC	Receivership Duties Finalize demand letters and calculations.	2.10	336.00

	<u>Hours</u>	<u>Amount</u>
2/28/2023 CAH Receivership Duties Approve wire transfers; review articles regarding receiver's successful litigation against banks in similar matter.	0.40	250.00
For professional services rendered	119.70	\$45,061.50
Accounts receivable transactions		
3/1/2023 Payment invoice #2590 - Thank You. Check No. 1684		(\$53,078.80)
Total payments and adjustments		(\$53,078.80)
Balance due		<u>\$45,061.50</u>

Consultant Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Clyde A. Hamstreet - Principal	7.90	625.00	\$4,937.50
Hannah Schmidt - Consultant	65.40	500.00	\$32,700.00
Martha Cohn - Jr. Consultant	46.40	160.00	\$7,424.00

EXHIBIT B

Client.Matter	Description	Bill Amt	Fees	Costs	Bill Num
721921.0001	American Eagle Mortgage Investment Funds	\$9,621.56	\$9,256.00	\$365.56	2205207
721921.0017	Adjunct Litigation Claims Against Ross Miles, Maureen Wile, et al.	\$203,793.05	\$188,986.00	\$14,807.05	2205210
		\$213,414.61	\$198,242.00	\$15,172.61	



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: 2205207
March 8, 2023

Invoice Summary

Professional Fees Through February 28, 2023	\$9,256.00
Disbursements	<u>\$365.56</u>
Amount Due – Current Period:	<u>\$9,621.56</u>

To pay by wire transfer, route to:

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

To pay by credit card, use this link:

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

To pay by check, remit to:

PO Box 3585
Portland, OR 97208-3585

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

Invoice Detail

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/01/23	J. Knapp	2.5	Continue drafting McQuhae reconveyance documents (.7); emails with Hannah Schmidt re same (.2); draft McQuhae notice of satisfaction of judgment (1.4); emails with Hannah Schmidt re notice of satisfaction of judgment (.2)
02/01/23	P. McLean	1.2	Review reconveyance documents and revise per recording requirements and coordinate remote notary for document signing
02/02/23	J. Knapp	0.4	Emails with Hannah Schmidt re McQuhae reconveyance and judgment satisfaction
02/03/23	J. Knapp	0.4	Draft notice of intent to compensate (January 2023)
02/06/23	J. Knapp	0.7	Email communications with Martha Cohn re Neil Rylander claim transfer (.4); continue drafting notice of intent to compensate (January 2023) (.3)
02/07/23	J. Knapp	0.5	Continue drafting notice of intent to compensate (January 2023) (.3); email communications with Leslie Sheldon re notice of intent to compensate (January 2023) (.2)
02/08/23	J. Knapp	1.4	Continue drafting notice of intent to compensate (January 2023) (.6); emails with Teri Yamauchi re same (.2); emails with Michael Ueltzen re same (.2); emails with Paul Artley re same (.2); emails with Veronica Hamstreet re same (.2)
02/09/23	J. Knapp	2.2	Virtual meeting with Kashya Shei, Crystal Boodoo, Hannah Schmidt, and Joe Vance re SEC investigation (.5); telephone call with Erin Stines re McQuhae reconveyance and satisfaction (.5); emails with Erin Stines re same (.4); continue drafting notice of intent to compensate (January 2023) (.4); emails with Veronica Hamstreet re same (.2); emails with Rosen Law re same (.2)
02/10/23	H. Harmon	0.3	Remote notarization with John Knapp for partial satisfaction of judgment against defendant American Securities, Inc

March 8, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/10/23	J. Knapp	2.5	Finalize notice of intent to compensate (January 2023) (.4); emails with Naureen Khan re transmittal of notice for uploading to website (.2); emails with Martha Cohn re McQuhae settlement issues and reconveyance documents (.5); emails with Erin Stines re McQuhae reconveyance and satisfaction documents (.3); emails with Peggy McLean re reconveyance and satisfaction documents (.2); emails with Joe Vance re satisfaction documents (.1); coordinate recording and filing of reconveyance and satisfaction documents (.8)
02/10/23	P. McLean	0.9	Format appointment of successor trustee for online recording (.2); upload document for recording with Cowlitz County Recorder (.1); download and process recorded appointment of successor trustee (.3); process receipt for recording fees (.1); coordinate signature and notarization of full reconveyance (.2)
02/13/23	H. Harmon	0.4	Prepare partial satisfaction of judgment regarding American Securities for electronic filing (.2); prepare partial satisfaction of judgment with recording cover sheet for recording with Cowlitz County auditor (.2)
02/13/23	J. Knapp	0.2	Emails with Naureen Khan re transmittal of documents for posting to website
02/14/23	B. Dickey	0.4	Prepare and file Washington annual reports of American Eagle Mortgage 200, LLC and American Eagle Mortgage Mexico 300, LLC
02/14/23	H. Harmon	0.2	Perform remote electronic notarization of full reconveyance for trustee David Rice for MN Service Corporation (WA)
02/14/23	J. Knapp	0.2	Emails with Peggy McLean re recording of McQuhae reconveyance
02/14/23	P. McLean	0.6	Format McQuhae full reconveyance for online recording (.2); upload document for recording with Cowlitz County Recorder (.1); download and process recorded reconveyance (.2); process receipt for recording fees (.1)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/14/23	D. Rice	0.5	Handle issues and Zoom call re notary for real estate transaction document
02/15/23	J. Knapp	0.8	Telephone call and emails with Martha Cohn re McQuhae satisfaction and reconveyance documents (.5); review satisfaction and reconveyance documents (.3)
02/17/23	J. Knapp	0.4	Email communications with Martha Cohn re Shae Conover claim transfer (.2); review claim transfer documentation and claim orders (.2)
02/21/23	J. Knapp	0.1	Emails with Martha Cohn re claim transfer

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
D. Rice	Partner	0.5	\$650	\$325.00
J. Knapp	Partner	12.3	625	7,687.50
B. Dickey	Paralegal	0.4	330	132.00
P. McLean	Paralegal	2.7	330	891.00
H. Harmon	Paralegal	0.9	245	220.50
Summary Total:		16.8		\$9,256.00

Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Washington Secretary of State annual report filing fees for American Eagle Mortgage 200, LLC and American Eagle Mortgage Mexico 300, LLC , Date: 2/14/2023	120.00
Simplifile (ACH); Invoice#: 03012023; Recording fees for appointment of successor trustee	30.03
Simplifile (ACH); Invoice#: 03012023; Recording fees for McQuhae full reconveyance	215.53
Disbursement Total:	\$365.56

Invoice Summary

Professional Fees Through February 28, 2023	\$9,256.00
Disbursements	\$365.56
Amount Due - Current Period:	\$9,621.56



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: 2205210
March 8, 2023

Invoice Summary

Professional Fees Through February 28, 2023	\$188,986.00
Disbursements	<u>\$14,807.05</u>
Amount Due – Current Period:	<u>\$203,793.05</u>

To pay by wire transfer, route to:

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

To pay by credit card, use this link:

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

To pay by check, remit to:

PO Box 3585
Portland, OR 97208-3585

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

Invoice Detail

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/01/23	E. Decker	2.4	Draft responses to Pacific Premier Bank's damages-focused interrogatories and requests for production (1.7); correspond with counsel for Riverview Bank re Rule 30(b)(6) depositions (.2); update Rule 30(b)(6) notice to Riverview Bank (.4); finalize and serve production of documents from Hamstreet servers in response to Pacific Premier Bank request (.1)
02/01/23	L. Giles	4.5	Review documents produced to support damages calculations and references in collateral reports (2.5); review interrogatories for responses (2.0)
02/01/23	H. Harmon	0.2	Assist with finalizing tenth supplemental responses to Pacific Premier Bank's interrogatories and prepare for distribution (.1); compile declarations filed in receivership and adjunct cases for Michael Ueltzen for attorney review (.1)
02/01/23	L. Peterson	1.7	Review first production of Hamstreet emails collected under Pacific Premier Bank's October 2022 search terms and email to Streamline to request revisions (.6); email to Streamline to incorporate production of damages documents in Relativity (.1); prepare ShareFile for production of Hamstreet emails and email link to Edward Decker (.3); review memo by Martha Cohn and review electronic database for referenced damages spreadsheet (.6); emails with Lorien Giles re damages spreadsheet (.1)
02/01/23	B. Shattuck	1.4	Review materials for trial for Joseph Vance
02/01/23	J. Vance	8.5	Prepare for and take deposition of Tami Nesburg
02/02/23	E. Decker	0.3	Serve additional document productions to bank defendants (.1); draft responses to Pacific Premier Bank's requests for production of documents (.2)
02/02/23	L. Giles	5.6	Draft objections and responses to Riverview Bank's interrogatories and requests for production and review related documents

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/02/23	H. Harmon	0.8	Assist with compilation and organization of materials selected by attorney for deposition preparation with Hannah Schmidt (.4); prepare verification statements from Hannah Schmidt for discovery responses to Pacific Premier Bank and Riverview Community Bank (.4)
02/02/23	L. Peterson	6.7	Review ShareFile activity notifications and update document indexes (.9); email from Hannah Schmidt re Strunk document, incorporate document in electronic database, and prepare instructions for production (.6); continue to review and analyze documents for privilege and responsiveness to discovery requests (4.9); communications with Sarah Houser re search terms applied to Hamstreet emails (.3)
02/02/23	J. Vance	3.0	Prepare for depositions
02/03/23	E. Decker	8.4	Finalize responses to Pacific Premier Bank requests for production (.2); draft responses to Pacific Premier Bank interrogatories (.4); prepare for and appear at deposition of Hannah Schmidt (7.8)
02/03/23	L. Giles	3.7	Draft responses to Riverview Community Bank's discovery requests
02/03/23	H. Harmon	1.2	Assist with finalizing deposition notice to Riverview Community Bank and prepare for distribution and coordinate court reporting and videographer services and update case docketing (.3); assist with finalizing discovery verifications and prepare for distribution (.2); assist with deposition document support for deposition of Hannah Schmidt (.3); assist with finalizing responses to Pacific Premier Bank's corrected fourth requests for production and prepare for distribution (.1); prepare deposition transcript and exhibits for Daniel Cox for attorney review and distribution to experts by ShareFile links (.3)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/03/23	L. Peterson	7.5	Emails with Sarah Houser re search terms applied to Hamstreet emails (.4); continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests (6.7); call with Edward Decker re privilege log (.1); emails with Leann Astheimer re production (.1); correct production and email to counsel with ShareFile link (.2)
02/03/23	T. Sand	0.2	Email to counsel re discovery responses and deposition schedule
02/03/23	J. Vance	9.0	Review draft discovery responses (1.5); prepare for and defend deposition of Hannah Schmidt (7.5)
02/04/23	J. Vance	2.5	Analyze potential evidence for trial
02/05/23	E. Decker	0.7	Analyze Hamstreet documents to be produced (.2); virtual meeting with Lisa Peterson re review of Hamstreet emails (.5)
02/05/23	L. Peterson	4.5	Virtual meeting with Edward Decker re Hamstreet email review (.5); continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests (4.0)
02/06/23	E. Decker	9.5	Draft responses to Pacific Premier Bank's interrogatories (1.2); revise draft responses to Riverview Community Bank's interrogatories (.5); analyze Hamstreet documents slated for production (.4); appear at deposition of Hannah Schmidt (7.4)
02/06/23	D. Foraker	0.1	Emails re cancellation of bi-monthly AEM receiver/AEM investor meeting
02/06/23	L. Giles	6.5	Revise responses to Riverview Community Bank's interrogatories and requests for production
02/06/23	H. Harmon	0.2	Prepare deposition transcript and exhibits for Tami Nesburg for attorney and expert review

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/06/23	L. Peterson	7.2	Continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests (6.8); messages with Edward Decker re document review issues (.4)
02/06/23	J. Vance	8.0	Defend deposition of Hannah Schmidt
02/07/23	E. Decker	8.0	Draft responses to Pacific Premier Bank's interrogatories (1.5); call with Hannah Schmidt and Michael Ueltzen re basis for report (.3); prepare for and appear at deposition of Hannah Schmidt (6.0); virtual meeting with Lorien Giles re responses to Riverview Community Bank interrogatories (.2)
02/07/23	L. Giles	2.1	Revise interrogatory responses (1.9); virtual meeting with Edward Decker re responses to Riverview Community Bank interrogatories (.2)
02/07/23	H. Harmon	0.9	Assist with preparation of spreadsheet of documentation provided to expert Michael Ueltzen (.8); finalize responses to Pacific Premier Bank's third set of interrogatories and prepare for distribution (.1)
02/07/23	L. Peterson	8.4	Reschedule strategy meeting (.1); emails with Hannah Schmidt re additional documents to provide to expert, review documents and locate produced versions (1.1); prepare spreadsheet of documents provided to expert Michael Ueltzen (1.2); continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests (5.7); email to Edward Decker re status of Hamstreet email review (.3)
02/07/23	T. Sand	0.2	Conference with Joseph Vance
02/07/23	J. Vance	8.0	Defend deposition of Hannah Schmidt (7.0); conference with Hannah Schmidt re strategy (.5); exchange communications with Shannon Armstrong re discovery issues (.3); conference with Tom Sand re strategy (.2)

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/08/23	E. Decker	2.7	Virtual meeting with Joseph Vance, Tom Sand, Mark Tyler, Lorien Giles, and Lisa Peterson re current depositions, expert discovery, pending productions and discovery responses and upcoming motion to compel (.9); virtual meeting with Lorien Giles re Riverview Community Bank deposition and responses to Riverview Community Bank discovery requests (.2); virtual meeting with Joseph Vance re conferral with Pacific Premier Bank (.2); virtual meeting with Lisa Peterson re review of Hamstreet documents and privilege logs (.3); analyze Hamstreet documents to be included in production to Pacific Premier Bank (.7); draft chronology of key Riverview Community Bank events (.4)
02/08/23	D. Foraker	0.2	Review draft Hamstreet privilege log and related emails with Joseph Vance
02/08/23	L. Giles	2.9	Virtual meeting with Joseph Vance, Tom Sand, Edward Decker, Mark Tyler, and Lisa Peterson re current depositions, expert discovery, pending productions and discovery responses and upcoming motion to compel (.9); virtual meeting re Riverview Community Bank deposition and responses to Riverview Community Bank discovery requests (.2); revise interrogatory responses (1.8)
02/08/23	L. Peterson	7.8	Review memorandum on guidance for categorical privilege logs (.3); review privilege logs prepared by Nick Hughes (.4); virtual meeting with Edward Decker re review of Hamstreet documents and privilege logs (.3); virtual meeting with Joseph Vance, Tom Sand, Edward Decker, Mark Tyler, and Lorien Giles re current depositions, expert discovery, pending productions and discovery responses and upcoming motion to compel (.9); review emails from Joseph Vance and David Foraker re privilege status of pre-receivership emails in Hamstreet email collection (.1); communications with Joseph Vance re privileged emails (.4); continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests (4.5); revise detailed privilege log of pre-receivership emails and email same to Joseph Vance (.9)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/08/23	T. Sand	1.0	Prepare for and attend virtual meeting with Joseph Vance, Edward Decker, Lorien Giles, Mark Tyler, and Lisa Peterson re depositions, expert discovery, document production, and discovery responses and defendants' motion to compel (.9); email David Foraker re privilege log (.1)
02/08/23	M. Tyler	5.0	Draft summary of deposition of Tami Nesburg (4.1); virtual meeting with Joseph Vance, Tom Sand, Edward Decker, Lorien Giles, and Lisa Peterson re current depositions, expert discovery, pending productions and discovery responses and upcoming motion to compel (.9)
02/08/23	J. Vance	3.4	Review and comment on issues related to privilege log (.8); review email from Pacific Premier Bank re discovery issues (.5); analyze and prepare response to discovery issues (.7); analyze issues for trial (.5); virtual meeting with Tom Sand, Edward Decker, Lorien Giles, Mark Tyler, and Lisa Peterson (.9)
02/09/23	E. Decker	1.2	Virtual meeting with Lorien Giles re Riverview Community Bank Rule 30(b)(6) deposition and responses to Riverview Community Bank interrogatories (.4); prepare for Riverview Community Bank Rule 30(b)(6) deposition (.8)
02/09/23	L. Giles	3.8	Meet and confer regarding upcoming motion to compel and related discussion (.9); review outstanding tasks for subsequent Riverview Community Bank Rule 30(b)(6) deposition notice (.8); review opposing counsel's summary of meet and confer and redline (.6); review policy documents from database (1.1); virtual meeting with Edward Decker re Riverview Community Bank Rule 30(b)(6) deposition and responses to Riverview Community Bank interrogatories (.4)
02/09/23	H. Harmon	0.5	Prepare summary of the number of discovery requests from Pacific Premier Bank and the number of responses submitted (.4); exchange communications with Beovich Veritext court reporters re rough draft transcript order for Hannah Schmidt depositions (.1)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/09/23	L. Peterson	4.3	Revise privilege log (.3); continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests (2.4); prepare instructions to Streamline Imaging for production run and emails re same (.5); review production run and prepare ShareFile (.4); email to Edward Decker with link to production (.1); communications with Lorien Giles re Riverview Community Bank documents (.2); organize deposition transcript for digesting and email to Mark Tyler re same (.3); update document index (.1)
02/09/23	T. Sand	0.3	Email Kristin Asai re agenda for meet and confer (.1); email Joseph Vance re strategy for response to motion to compel (.2)
02/09/23	M. Tyler	0.4	Continue drafting summary of deposition of Tami Nesburg
02/09/23	J. Vance	4.5	Prepare for conferral with Pacific Premier Bank's attorneys re discovery issues (.5); participate in conferral with Pacific Premier Bank's attorneys re discovery issues (.5); prepare supplemental discovery responses (1.0); analyze issues for trial (2.5)
02/10/23	E. Decker	3.5	Virtual meeting with Lorien Giles re Riverview Community Bank Rule 30(b)(6) deposition (.2); revise responses to Riverview Community Bank's interrogatories (1.2); prepare for Riverview Community Bank Rule 30(b)(6) deposition (1.1); virtual meeting with Tom Sand and Joseph Vance (1.0)
02/10/23	D. Foraker	0.3	Virtual meeting with Joseph Vance re status of discovery
02/10/23	L. Giles	5.6	Research for upcoming motion to compel (3.5); virtual meeting with Edward Decker re Riverview Community Bank Rule 30(b)(6) deposition (.2); call with expert witness regarding interrogatory responses (.9); revise interrogatory responses to reflect call (1.0)
02/10/23	H. Harmon	0.5	Review receivership and adjunct case files for documentation of initial contact with Riverview Community Bank regarding potential claims and compile documentation requested by Edward Decker for review

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/10/23	T. Sand	1.0	Virtual meeting with Joseph Vance and Edward Decker re trial strategy
02/10/23	J. Vance	1.3	Virtual meeting with Tom Sand and Edward Decker (1.0); virtual meeting with David Foraker (.3)
02/11/23	E. Decker	0.1	Correspond with counsel for Riverview Community Bank re interrogatories
02/11/23	L. Giles	1.9	Research for upcoming motion to compel
02/12/23	L. Giles	1.8	Continue research for upcoming motion to compel
02/13/23	E. Decker	3.9	Prepare for Riverview Community Bank Rule 30(b)(6) deposition (2.0); virtual meeting with Lorien Giles re Riverview Community Bank Rule 30(b)(6) deposition (.3); revise responses to Riverview Community Bank's interrogatories (1.6)
02/13/23	L. Giles	6.3	Draft deposition outline for Riverview Community Bank Rule 30(b)(6) deposition (6.0); virtual meeting with Edward Decker re Riverview Bank Rule 30(b)(6) deposition (.3)
02/13/23	H. Harmon	0.9	Assist with preparation of potential deposition exhibits for Riverview Community Bank's corporate designee depositions
02/13/23	T. Sand	0.4	Review motion to compel and notice of hearing (.2); email Joseph Vance re case analysis (.2)
02/13/23	M. Tyler	0.6	Preparation for deposition of Riverview Community Bank Rule 30(b)(6) witnesses
02/13/23	J. Vance	0.5	Analyze motion to compel
02/14/23	E. Decker	6.5	Prepare for and take Rule 30(b)(6) depositions of Riverview Community Bank witnesses
02/14/23	L. Giles	7.5	Research and draft response to motion to compel response

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/14/23	H. Harmon	0.5	Assist with identifying Bates numbered production of exhibits attached to Hannah Schmidt declarations filed with court, and compile documents for expert witness review
02/14/23	L. Peterson	5.5	Communications with Joseph Vance re documents for expert (.4); review and analyze and prepare additional documents for expert (1.1); update ShareFile for expert and communications with expert to resolve uploading issues (.3); prepare instructions for inclusion and for production of additional documents in Eclipse database (.5); analyze number of documents produced and provide Lorien Giles with requested summary (.4); email to Streamline Imaging with additional documents for inclusion in Relativity database (.1); review, analyze, and respond to emails from expert re Bates numbered documents (1.0); update document index (.2); continue to review and analyze Hamstreet documents for privilege and responsiveness to discovery requests and analyze metadata for categorical privilege log (1.5)
02/14/23	M. Tyler	5.7	Appear at deposition of Erik Landon (1.8); appear at deposition of Jewel Webster (3.9)
02/14/23	J. Vance	5.5	Outline response to motion to compel (.8); analyze and respond to discovery issues (.7); analyze and organize arguments for trial (4.0)
02/15/23	E. Decker	3.6	Telephone calls with Lisa Peterson re final review of Hamstreet documents and privilege log (.4); analyze final questions re Hamstreet documents (.5); virtual meeting with Joseph Vance re supplemental interrogatory responses, privilege logs, and final document productions (.3); review Riverview Community Bank portions of draft expert report (1.4); draft mock trial exhibits re transaction structures with Pacific Premier Bank (1.0)
02/15/23	L. Giles	8.9	Draft response to motion to compel

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/15/23	L. Peterson	4.9	Emails with Streamline Imaging requesting report of unique email addresses in second collection of Hamstreet emails (.6); emails with Martha Cohn re work papers and set up ShareFile for same (.3); telephone calls with Edward Decker re final review of Hamstreet documents and privilege log (.4); communications with Diana Ramos re Spanish language documents (.2); email to Streamline to request native export of certain Spanish language documents from Relativity database (.3); review and analyze report of email addresses in connection with categorical privilege log (1.0); review and analyze Hamstreet documents for privilege and responsiveness to discovery requests (2.1)
02/15/23	D. Ramos	1.8	Review Spanish language emails and attachments and create list of documents and parties involved
02/15/23	T. Sand	2.0	Draft outline for opening statement
02/15/23	M. Tyler	3.7	Draft summary of deposition of Daniel Cox
02/15/23	J. Vance	4.5	Prepare supplemental discovery responses (3.5); revise and edit response to motion to compel (1.0)
02/16/23	E. Decker	1.0	Draft letter to Riverview Community Bank following up on issues raised at Rule 30(b)(6) deposition
02/16/23	L. Giles	7.8	Review production for policy documents (4.6); revise response brief and related declarations (3.2)
02/16/23	H. Harmon	0.7	Prepare deposition exhibits for Clyde Hamstreet for attorney review (.2); assist with finalization of response to Pacific Premier Bank's motion to compel and supporting declarations and prepare for electronic filing and distribution (.4); assist with finalizing supplemental responses to Pacific Premier Bank's second and third sets of interrogatories (.1)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/16/23	L. Peterson	14.0	Review email from Diana Ramos re Spanish language documents (.1); emails with Mark Tyler re Streamline e-discovery expert (.1); emails with Joseph Vance re privilege of certain Hamstreet emails (.5); continue to review and analyze Hamstreet emails for privilege and responsiveness to discovery requests, and review privileged documents in connection with categorical privilege log (6.9); emails with Sarah Houser of Streamline Imaging re email address reports on privileged emails, and review reports (1.0); emails with Martha Cohn re work papers (.1); emails with Joseph Vance re AEM pools dynamic balance spreadsheet and review same for highlighting or personal notes (.4); download, review, and organize work papers and prepare instructions for inclusion of documents in electronic database (.8); communications with Joseph Vance re categorical privilege log and work papers (.4); prepare instructions for production of work papers and spreadsheet (.2); revise categorical privilege log and prepare players directory for same (3.5)
02/16/23	T. Sand	0.7	Review briefs re motion to compel (.3); revise draft outline for opening statement (.4)
02/16/23	M. Tyler	1.4	Revise draft letter to Riverview Community Bank counsel
02/16/23	J. Vance	7.0	Revise and finalize response pleadings to motion to compel (4.5); review and comment on privilege log (.5); analyze and respond to discovery issues (1.0); analyze issues for trial (1.0)
02/17/23	E. Decker	1.0	Virtual meeting with Joseph Vance and Tom Sand re strategy call with client and summary judgment briefing (.8); telephone calls with Lorien Giles and Mark Tyler re summary judgment briefing (.2)

March 8, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/17/23	L. Peterson	4.8	Communications with Joseph Vance re privilege logs, productions of documents, and documents shared with expert (1.3); prepare searches for next production of Hamstreet emails from Relativity database (.8); email to Streamline Imaging with instructions for production of documents (.2); revise categorical privilege log and players directory (1.0); email from Martha Cohn re additional documents (.1); download, review, and organize documents, and prepare instructions for inclusion in electronic database (.5); email to counsel with link to production of documents, privilege logs, and players directory (.3); email to Streamline with link to production for loading in Relativity database (.1); update document index (.5)
02/17/23	T. Sand	0.8	Virtual meeting with Joseph Vance and Edward Decker re strategy call with clients and motion for summary judgment briefing
02/17/23	M. Tyler	1.0	Continue drafting summary of deposition of Daniel Cox
02/17/23	J. Vance	6.0	Review and comment on draft privilege log (.6); review Pacific Premier Bank's privilege log (.4); analyze discovery responses (1.7); virtual meeting with Tom Sand and Edward Decker (.8); develop themes for trial (2.5)
02/18/23	L. Giles	2.6	Review reply brief and research cited cases
02/20/23	E. Decker	0.6	Virtual meeting with client to discuss case status and strategy
02/20/23	T. Sand	0.9	Virtual meeting with client to discuss case status and strategy (.6); review outline of opening statement in preparation for client call (.3)
02/20/23	J. Vance	0.6	Virtual meeting with client to discuss case status and strategy

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/21/23	E. Decker	3.1	Plan drafting and research projects in anticipation of bank defendants' motions for summary judgment (1.5); virtual meeting with Joseph Vance re discovery and motions for summary judgment (.2); finalize and serve document production on bank defendants (.2); correspond with Hannah Schmidt re interrogatory responses (.2); analyze draft expert report re Riverview Community Bank's conduct (1.0)
02/21/23	L. Giles	7.3	Research for responses to motions for summary judgment
02/21/23	H. Harmon	0.1	Exchange email communications with Bridget Donegan regarding preparation for deposition of Sherry Beattie
02/21/23	L. Peterson	1.2	Prepare supplemental production of documents (1.0); emails with Joseph Vance and Edward Decker re production (.2)
02/21/23	T. Sand	0.2	Telephone call with Joseph Vance re court hearing and strategy for follow-up
02/21/23	M. Tyler	2.6	Appear at deposition of Robert Laskowski
02/21/23	J. Vance	5.0	Prepare for hearing on motion to compel (2.0); attend hearing on motion to compel (1.0); review documents to be produced (1.0); virtual meeting with Edward Decker (.2); telephone call with Tom Sand (.2); telephone call with Hannah Schmidt re strategy (.4); review communication from Pacific Premier Bank's attorney (.2)
02/22/23	E. Decker	3.2	Virtual meeting with Mark Tyler re Robert Laskowski and Sherry Beattie depositions (.2); review Riverview Community Bank portions of draft expert report (2.3); prepare for Sherry Beattie deposition (.2); prepare for motion for summary judgment briefing (.5)
02/22/23	L. Giles	0.7	Review materials provided to receiver's experts
02/22/23	H. Harmon	1.8	Assist with finalizing inventory of documents reviewed by expert (1.7); update case docketing for summary judgment motion hearing and briefing scheduling (.1)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/22/23	T. Sand	0.3	Review email from Edward Decker re strategy and outline for motion for summary judgment briefing (.2); email Kristin Asai re motion for summary judgment hearing (.1)
02/22/23	M. Tyler	1.1	Draft portion of opposition to summary judgment motions (.9); virtual meeting with Edward Decker re Robert Laskowski and Sherry Beattie depositions (.2)
02/22/23	J. Vance	1.5	Outline arguments for responses to motions for summary judgment
02/23/23	E. Decker	1.8	Analyze Riverview Community Bank portions of draft expert report (1.5); virtual meeting with Lisa Peterson and Lorien Giles re Riverview Community Bank promissory notes and loan agreements missing from discovery (.3)
02/23/23	L. Giles	4.4	Review production for Riverview Community Bank loan documentation (3.2); virtual meetings with Lisa Peterson re Riverview Bank promissory notes and loan agreements missing from discovery (.9); virtual meetings with Edward Decker and Lisa Peterson re Riverview Community Bank promissory notes and loan agreements missing from discovery (.3)
02/23/23	H. Harmon	1.0	Obtain deposition transcripts and exhibits for David Foraker, Clyde Hamstreet, Lynn Barnett, Barbara Jacobs, Miles Minsker, Suzanne Nichols, Maureen Wile, Wendi Hamann, David Saathoff, and three volumes for Hannah Schmidt and prepare for attorney review and distribution to Mike Esler and Bridget Donegan
02/23/23	L. Peterson	2.5	Virtual meetings with Lorien Giles re Riverview Community Bank promissory notes and loan agreements missing from discovery (.9); virtual meeting with Edward Decker and Lorien Giles re same (.3); email to Edward Decker re Riverview Community Bank's December 2022 production (.1); review and analyze Riverview Community Bank documents for promissory notes and loan agreements (1.0); prepare Riverview Community Bank documents for attorney review (.2)

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/23/23	T. Sand	0.5	Review letter from Kristin Asai re objections to privacy log (.1); telephone call with Joseph Vance and Edward Decker re response to Pacific Premier Bank letter re work product documents (.4)
02/23/23	J. Vance	3.2	Review correspondence from Pacific Premier Bank re discovery (.4); review expert report (2.8)
02/24/23	K. Bennett	2.5	Review letter outlining arguments by Pacific Premier Bank demanding privilege log (.3); analyze prior research conducted re work product of receivership investigation (.5); begin legal research re arguments in support of categorical privilege log vs. document by document privilege log in light of minimal relevance to allegations and defenses (1.7)
02/24/23	E. Decker	0.6	Virtual meeting with Tom Sand and Joseph Vance re letter from Pacific Premier Bank re work product documents (.4); analyze legal research on summary judgment issues (.2)
02/24/23	L. Giles	4.1	Prepare factual background for responses to motions for summary judgment
02/24/23	H. Harmon	0.1	Prepare Gary Stoley report for distribution to opposing counsel
02/24/23	L. Peterson	1.6	Review Streamline Imaging invoice for accuracy and email same to Joseph Vance (.1); emails with Streamline Imaging with request to upload recent productions to Relativity database and run gaps report (.3); review numerous ShareFile notifications of download and update document index (1.2)
02/24/23	T. Sand	0.4	Virtual meeting with Joseph Vance and Edward Decker
02/24/23	M. Tyler	3.2	Research and draft legal argument regarding weight of evidence for motion for summary judgment (1.9); research and draft counter statement of facts for responses to motions for summary judgment (1.3)

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/24/23	J. Vance	3.0	Virtual meeting with Edward Decker and Tom Sand (.4); analyze legal issue related to discovery (1.0); review expert reports produced by defendants (1.6)
02/27/23	K. Bennett	6.5	Continue legal research re proper identification of documents in privilege log in light of undue burden on receiver to identify document-by-document vs. categorical (2.8); analyze legal research and outline arguments in favor to maintain categorical privilege log (1.2); legal research re assertion of work product privilege over receivership investigation conducted prior to initiating litigation (2.5)
02/27/23	E. Decker	1.6	Virtual meeting with Clyde Hamstreet, Hannah Schmidt, and Joseph Vance re bank defendants' expert reports (.6); draft response to Pacific Premier Bank's letter re work product status of receiver's communications (.5); analyze research in preparation for summary judgment briefing (.5)
02/27/23	L. Giles	7.8	Research for responses to motions for summary judgment
02/27/23	H. Harmon	0.2	Prepare attorney working notebook for receiver's, Pacific Premier Bank's, and Riverview Community Bank's expert reports
02/27/23	L. Peterson	0.2	Respond to email from Hannah Schmidt requesting original file name of a produced spreadsheet
02/27/23	T. Sand	0.5	Review expert reports
02/27/23	M. Tyler	5.7	Research and draft legal argument regarding actual knowledge by circumstantial evidence (2.3); continue research and drafting of counter statement of facts for response to motions for summary judgment (3.4)
02/27/23	J. Vance	3.2	Virtual meeting with Clyde Hamstreet, Hannah Schmidt, and Edward Decker re expert reports (.7); analyze expert reports (1.5); analyze issues for response to summary judgment motions (1.0)

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
02/28/23	K. Bennett	6.5	Continue to research applicability of work product doctrine to receivership investigation documents (1.5); research work product doctrine application in Washington State and the ability to extend protection from other litigation (1.0); analyze legal research and develop arguments to protect receivership work product documents (2.0); virtual meeting with Edward Decker re legal research issues (.2); draft internal memo outlining arguments to support positions re privilege log and work product assertion over receivership investigation (1.0); revise letter to Pacific Premier Bank's counsel to incorporate case citations (.8)
02/28/23	E. Decker	4.4	Draft response to Pacific Premier Bank's letter re receiver's internal emails (3.0); analyze research done in preparation for summary judgment briefing (.8); virtual meeting with Katie Bennett re research on discovery issues (.2); virtual meeting with Lorien Giles re research projects on discovery and summary judgment issues (.4)
02/28/23	L. Giles	9.3	Research for responses to summary judgment motions
02/28/23	H. Harmon	0.6	Review case file to compile summary of timeline for adjunct lawsuit filings and subpoenas issued in receivership lawsuit (.4); obtain deposition transcript and exhibits for Ross Miles and prepare for attorney review and distribution to Mike Esler (.2)
02/28/23	L. Peterson	2.8	Update table of depositions and organize transcripts for digesting (.4); telephone call from Edward Decker re information for Hamstreet email production (.1); review and analyze productions from first Hamstreet email collection and email to Edward Decker with requested details (1.3); review Pacific Premier Bank's motion for summary judgment (1.0)
02/28/23	T. Sand	2.4	Review Pacific Premier Bank's and Riverview Community Bank's motions for summary judgment

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
T. Sand	Partner	11.8	\$865	\$10,207.00
D. Foraker	Partner	0.6	685	411.00
J. Vance	Partner	88.2	580	51,156.00
E. Decker	Partner	68.1	505	34,390.50
L. Giles	Associate	105.1	425	44,667.50
K. Bennett	Associate	15.5	410	6,355.00
M. Tyler	Associate	30.4	395	12,008.00
D. Ramos	Associate	1.8	370	666.00
B. Shattuck	Associate	1.4	370	518.00
L. Peterson	Paralegal	85.6	305	26,108.00
H. Harmon	Paralegal	10.2	245	2,499.00
Summary Total:		418.7		\$188,986.00

Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6323641; Transcript services for Suzanne Nichols	513.50
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6347396; Transcript services for Wendi Hamann	1,250.90
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6340538; Transcript services for Maureen Teresa Wile	314.10
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6353330; Transcript services and litigation packages for David Saathoff	354.50
Naegeli Deposition and Trial; Invoice#: 19226; Court reporting and videographer services for deposition of Tami Nesburg	2,903.60
Naegeli Deposition and Trial; Invoice#: 19227; Court reporting and videographer services for deposition of Tami Nesburg	2,025.80
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6369019; Transcript services for Hannah Schmidt Volume II	1,222.00
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6376488; Depositions of Hannah Schmidt	3,226.40
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6371700; Depositions of Hannah Schmidt	671.25
Streamline Imaging (ACH); Invoice#: 37332; Third party productions loaded into Relativity as well as monthly storage and user fees	2,325.00
Disbursement Total:	\$14,807.05

Account: 721921

Invoice: 2205210

March 8, 2023

Invoice Summary

Professional Fees Through February 28, 2023

\$188,986.00

Disbursements

\$14,807.05

Amount Due - Current Period:

\$203,793.05

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
Professional Services for February 2023

Date	Description	Person	Hours	Rate	Amount
2/7/2023	Call with HS and counsel	MU	0.6	450.00	\$ 270.00
2/10/2023	Call from counsel and review Cox Depo	MU	3.6	450.00	1,620.00
2/27/2023	Read expert reports and outline issues	MU	2.9	450.00	<u>1,305.00</u>
	Total				<u>\$ 3,195.00</u>

EXHIBIT D



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	15066
Date	02/28/23
Job Number	AEM-003
PO#	--
Charge#	--

Job Name: Microsite Updates & Maintenance

Agency Contact Brian Gard

Description: For Professional Services Rendered Through February, 2023:

Description	Hours Billed	Amount
Account Services	0.75	\$131.25
Professional Services Subtotal:	0.75	\$131.25
TOTAL:	0.75	\$131.25

PAYMENT TERMS: net 30 days



Invoice Detail Report

Invoice : 15066 Client : Hamstreet & Associates - AEM (AEM)

03/08/23 10:59 AM
(TY)

Reference: Date: Vendor/Staff: Hours: Billed:

AEM-003 Microsite Updates & Maintenance

Account Services:				Rate	Hrs	Amount
403391	02/02/23	NK	Naureen Khan	\$175.00	0.25	\$43.75
	<i>Review billings</i>					
403081	02/13/23	NK	Naureen Khan	\$175.00	0.50	\$87.50
	<i>Document upload</i>				0.75	\$131.25
AEM-003 TOTAL					0.75	\$131.25
INVOICE #15066 TOTAL:					0.75	\$131.25

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

Invoice Date	Invoice Number
02/28/2023	22613
Terms	Service Through
	02/28/2023

In Reference To: General (Legal fees)					
Date	By	Services	Hours	Rates	Amount
02/01/2023	IM	Concall wAttny Daniela re. Corona Hearing	0.40	\$ 130.00/hr	\$ 52.00
02/02/2023	IM	Attend Corona hearing at Civil Court	2.50	\$ 130.00/hr	\$ 325.00
02/14/2023	IM	review of information re. closings AEM; communications wSalvador on tax issues	0.45	\$ 130.00/hr	\$ 58.50
02/15/2023	OV	Communications with Anthony Tremayne regarding the mortgage relese, review of all information to the pre same	1.00	\$ 120.00/hr	\$ 120.00
02/16/2023	IM	communications wAbdias re. tax issues and invoices for AEM closings (post-closing process)	0.20	\$ 130.00/hr	\$ 26.00
02/17/2023	OV	Follow up: Communications with the Notary Public to coordinate the process for the mortgage cancelation. Communications with Anthony Tremayne regarding the cancelation of the mortgage.	1.00	\$ 130.00/hr	\$ 130.00
02/21/2023	OV	Draft: Review, modify and continue with the preparation of the Power of Attorney for AEM200, and the certification to notarized and apostille. Communications with Mr. Tramayne and review and modification of the letter for the mortgage release of Tony Tremayne and	1.20	\$ 130.00/hr	\$ 156.00
02/24/2023	OV	Draft: Preparation of the final versions of the power of attorney an the certification for the sign of the mortgage release of Anthony Tremayne.	1.50	\$ 130.00/hr	\$ 195.00

Total Hours 8.25 hrs
Total Legal fees \$ 1,062.50
Total Amount \$ 1,062.50

In Reference To: Mar de Plata (Legal fees)

Date	By	Services	Hours	Rates	Amount
02/01/2023	BR	Communications: Zoom call Centeno re Mar de Plata trust and possible amendment strategies. Confer with Sal re: same and pending house-keeping matters.	1.00	\$ 350.00/hr	\$ 350.00
02/08/2023	BR	Meeting: John Hart.	1.00	\$ 350.00/hr	\$ 350.00
02/08/2023	IM	discuss wTeam re. templates; and pendings	0.40	\$ 130.00/hr	\$ 52.00
02/09/2023	OV	Draft: Review and continue with the drafting of the Spanish version of the promise to purchase agreement for Mar de Plata.	3.50	\$ 130.00/hr	\$ 455.00
02/09/2023	BR	Meeting: attny Ingrid re: status of entitlements.	0.50	\$ 350.00/hr	\$ 175.00
02/09/2023	IM	follow up on EIS and ETJ; Meeting wBen re. same	0.40	\$ 130.00/hr	\$ 52.00
02/10/2023	IM	email to Abdias re. adjustment in AEM Meeting Minutes	0.30	\$ 130.00/hr	\$ 39.00
02/10/2023	BR	Review: and revise Spanish version of PSA. Follow up Jim Hart.	0.50	\$ 350.00/hr	\$ 175.00
02/13/2023	BR	follow up Jim Hart re: new sales, signage, etc.	0.30	\$ 350.00/hr	\$ 105.00
02/14/2023	BR	Communications: Jim Hart re: listing, signage, contracts for sale.	0.30	\$ 350.00/hr	\$ 105.00
02/15/2023	OV	Modification of the Spanish version of the promise to purchase, sell o transfer into a trust agreement.	1.00	\$ 130.00/hr	\$ 130.00
02/16/2023	OV	Draft: Continue with the preparation of the spanish version of the promise to purchase, sell or transfer into a trust agreement, as well as the preparation of the spanish version of the financing addendum.	4.00	\$ 130.00/hr	\$ 520.00
02/16/2023	IM	review and revisions to Spanish version of MDP temp; email to Client on same; internal discussions wAttny Oscar on same	0.70	\$ 130.00/hr	\$ 91.00
02/16/2023	IM	weekly call to follow up on EIS and other processes	0.50	\$ 130.00/hr	\$ 65.00
02/16/2023	BR	Conference call: re: status of entitlement process.	0.40	\$ 350.00/hr	\$ 140.00
02/17/2023	IM	communications wHannah re Lot 16	0.20	\$ 130.00/hr	\$ 26.00
02/20/2023	JB	Barri, Juan re:: Read title deed Background, contact Notary 17 requirmentes to cancel Mortgage. Draft POA	1.50	\$ 100.00/hr	\$ 150.00
02/21/2023	IM	communications wHannah re. MDP docs for Lot 11	0.20	\$ 130.00/hr	\$ 26.00
02/21/2023	IM	follow up on EIS package wEvelyn	0.20	\$ 130.00/hr	\$ 26.00
02/21/2023	JB	Barri, Juan re:: Draft Letter of Instruction	1.00	\$ 100.00/hr	\$ 100.00
02/23/2023	IM	communications wHannah re. lot 16	0.10	\$ 130.00/hr	\$ 13.00
02/27/2023	IM	internal communications on MDP Lot 16 & 11	0.25	\$ 130.00/hr	\$ 32.50

Total Hours	18.25 hrs
Total Legal fees	\$ 3,177.50
Total Amount	\$ 3,177.50

Total Hours	26.50 hrs
Total Legal fees	\$ 4,240.00
Total Invoice Amount	\$ 4,240.00

Notes:

Thank you in advance for your prompt payment.