

E-FILED  
04-13-2023, 10:40  
Scott G. Weber, Clerk  
Clark County

1 55 Pages

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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 (MARCH 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.

1 Clyde A. Hamstreet & Associates, LLC, the duly appointed general receiver herein (the  
2 “Receiver”), submits the Receiver’s Notice of Intent to Compensate (March 2023) in accordance  
3 with Paragraph 11 of the Order Appointing General Receiver dated May 10, 2019 (the  
4 “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 March 2023. For this period, the Receiver requests  
14 final approval of its compensation in the amount of \$76,694.50 and reimbursement of no costs,  
15 for a total payment of \$76,694.50.

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 March 2023.  
18 For this period, such attorneys request final approval of their compensation in the amount of  
19 \$242,970.00 and reimbursement of costs of \$12,974.30, for a total payment of \$255,944.30.

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 March 2023. For this period, such forensic accountant requests final approval of his  
23 compensation in the amount of \$34,650.00 and reimbursement of no costs, for a total payment of  
24 \$34,650.00.

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 March 2023. For this period, such consultants request final approval of their  
2 compensation in the amount of \$262.50 and reimbursement of no costs, for a total payment of  
3 \$262.50.

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 March 2023. For this period, such attorneys request final approval of their compensation in the  
7 amount of \$1,478.50 and reimbursement of no costs, for a total payment of \$1,478.50.

8 Attached as Exhibit F hereto is a true and correct copy of the time and expense summary  
9 of the Receiver's authorized auditors in Mexico, Kreston BSG, S.C., for services and costs in  
10 March 2023. For this period, such auditors request final approval of their compensation in the  
11 amount of \$3,075.00 and reimbursement of no costs, for a total payment of \$3,075.00.

12 Unless objections to the foregoing requests are filed with the Court and served on the  
13 undersigned attorneys so as to be received by April 26, 2023, the Receiver may make the  
14 payments requested herein and/or the professionals may apply their retainers, if any.

15 DATED this 13<sup>th</sup> day of April, 2023.

16 MILLER NASH LLP

17  
18 /s/ John R. Knapp, Jr.

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

20 Attorneys for Receiver  
21 Clyde A. Hamstreet & Associates, LLC  
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23  
24  
25  
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# EXHIBIT A



**HAMSTREET**  
*& associates*

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

April 7, 2023

Invoice # 2599

Professional Services

			<u>Hours</u>	<u>Amount</u>
3/1/2023	MC	Litigation Support Read through summary judgement motions and documents and expert witness reports.	2.50	400.00
	MC	Administrative Services Update Quickbooks. Start payment histories and Evergreen reconciliation.	1.50	240.00
3/2/2023	CAH	Receivership Duties Read portions of the motions for summary judgement. Zoom meeting with counsel regarding motions. Discuss general financial issues with Hannah Schmidt.	2.60	1,625.00
	MC	Litigation Support Thorough review of expert reports; notate for follow-up call.	2.10	336.00
	MC	Administrative Services Evergreen reconciliation.	2.00	320.00
	HS	Litigation Support Call with Joe Vance, Edward Decker, Tom Sand, Michael Ueltzen and Martha Cohn regarding expert rebuttal.	0.80	400.00
	HS	Litigation Support Call with Joe Vance, Edward Decker and Clyde Hamstreet regarding summary judgement motions.	0.80	400.00
	HS	Litigation Support Research questions for Joe Vance and Michael Ueltzen.	2.50	1,250.00
	HS	Receivership Duties Download bank statements.	0.20	100.00
	MC	Litigation Support Call with Miller Nash team and Michael Ueltzen about rebuttal reports.	1.00	160.00

		<u>Hours</u>	<u>Amount</u>
3/2/2023	CAH	Litigation Support Call with Hannah Schmidt, Joe Vance and Edward Decker regarding summary judgement motions.	0.80 500.00
3/3/2023	MC	Litigation Support Continue review of Morones report. Call with Hannah Schmidt to go through Quickbooks data. Format report schedule detail in excel.	2.00 320.00
	MC	Administrative Services Finish Evergreen reconciliation.	2.10 336.00
	HS	Receivership Duties Read and respond to emails.	0.50 250.00
	HS	Receivership Duties Call with Martha Cohn to go through Quickbook data.	1.00 500.00
3/4/2023	CAH	Receivership Duties Read portions of expert reports.	2.10 1,312.50
3/5/2023	CAH	Receivership Duties Read hundreds of pages of expert witness reports, motions for summary judgment and portions of depositions.	8.30 5,187.50
3/6/2023	MC	Litigation Support Meet with Clyde Hamstreet to go over AEM projects.	0.50 80.00
	MC	Litigation Support Format and organize data from expert report. Match to existing regents analyses.	2.00 320.00
	MC	Litigation Support Call with Michael Ueltzen and Hannah Schmidt to go through expert reports.	1.50 240.00
	MC	Litigation Support Review and annotate Pacific Premier's motion for summary judgment.	1.20 192.00
	HS	Litigation Support Call with class action team.	0.70 350.00
	HS	Litigation Support Call with Michael Ueltzen and Martha Cohn regarding damage rebuttal.	1.50 750.00
	CAH	Litigation Support Meet with Martha Cohn to go over AEM projects.	0.50 312.50
3/7/2023	MC	Administrative Services Follow up with Evergreen on release of contract. Enter checks.	0.40 64.00
	MC	Litigation Support Work through Morones report detail per Michael Ueltzen's request.	3.30 528.00

			<u>Hours</u>	<u>Amount</u>
3/8/2023	MC	Litigation Support Continue to review detail underlying Morones report.	3.90	624.00
	HS	Litigation Support Review Riverview interrogatory responses and calls with Martha Cohn regarding research.	0.70	350.00
3/9/2023	MC	Litigation Support Continue work through Morones report detail.	5.10	816.00
	MC	Administrative Services Emails and phone calls with appraiser, borrower and note servicer.	0.50	80.00
	HS	Receivership Duties Emails regarding Mar de Plata.	0.50	250.00
	HS	Litigation Support Call with Joe Vance.	1.30	650.00
3/10/2023	MC	Litigation Support Call with Michael Ueltzen and Hannah Schmidt on expert report rebuttal.	1.00	160.00
	MC	Litigation Support Continue work on Morones report detail.	3.20	512.00
	HS	Litigation Support Prepare for and call with Michael Ueltzen and Martha Cohn. Follow up work on Michael Ueltzen requests.	4.00	2,000.00
3/13/2023	MC	Litigation Support Review draft of expert report. Organize information requested by Michael Ueltzen. Call with Michael Ueltzen and Hannah Schmidt regarding the same.	3.40	544.00
	HS	Receivership Duties Review draft report from Michael Ueltzen. Research regarding Michael Ueltzen requests.	1.80	900.00
	HS	Litigation Support Calls with Joe Vance and Michael Ueltzen and Martha Cohn.	0.50	250.00
3/14/2023	MC	Administrative Services Review appraisal report. Process and deposit checks.	0.60	96.00
	HS	Receivership Duties Calls and emails regarding Mar de Plata lots 12, 18 and 19.	1.10	550.00
	HS	Litigation Support Work with Martha Cohn on research for Michael Ueltzen.	2.50	1,250.00
	HS	Litigation Support Prepare for 30(b)(6) deposition.	0.80	400.00

			<u>Hours</u>	<u>Amount</u>
3/14/2023	MC	Litigation Support Review Michael Ueltzen's draft response to Porter report.	1.90	304.00
	MC	Litigation Support Review transaction documentation on Morones schedule 2.	2.20	352.00
	MC	Administrative Services Go to post office.	0.40	64.00
3/15/2023	MC	Litigation Support Call with Michael Ueltzen and Hannah Schmidt.	0.40	64.00
	MC	Litigation Support Review and comment on Michael Ueltzen memo.	2.20	352.00
	MC	Litigation Support Organize evidence regarding transactional detail for Michael Ueltzen.	0.60	96.00
	HS	Litigation Support Call with Martha Cohn and Michael Ueltzen. Follow up work regarding same.	3.00	1,500.00
	MC	Administrative Services Update Quickbooks. Call with investor.	1.20	192.00
3/16/2023	HS	Litigation Support Review and comment on summary judgement response. Call with Michael Ueltzen and Martha Cohn regarding damage rebuttal.	5.20	2,600.00
	MC	Litigation Support Review Miller Nash response.	3.90	624.00
	MC	Litigation Support Call with Hannah Schmidt and Clyde Hamstreet about expert reports and response to motion for summary judgment.	0.30	48.00
	MC	Litigation Support Call with Hannah Schmidt and Michael Ueltzen about expert report.	0.70	112.00
	HS	Litigation Support Call with Clyde Hamstreet and Martha Cohn about expert reports and response to motion for summary judgment.	0.50	250.00
	CAH	Litigation Support Call with Hannah Schmidt and Martha Cohn regarding expert reports and response to motion for summary judgement.	0.50	312.50
3/17/2023	HS	Litigation Support Prepare for 30(b)(6) deposition. Review summary judgement response, review and edit my declaration.	3.50	1,750.00
3/21/2023	CAH	Receivership Duties Follow up on property sales in Mexico, deed encumbrances in La Paz and environmental approvals.	0.50	312.50



		<u>Hours</u>	<u>Amount</u>
3/21/2023	HS	Litigation Support Prepare for my deposition. Call with Joe Vance regarding same.	1.90 950.00
	HS	Pacific Premier Bank Review draft report from Michael Ueltzen. Call with Michael Ueltzen and Martha Cohn regarding same.	3.20 1,600.00
	HS	Receivership Duties Emails regarding Mar de Plata sales.	0.70 350.00
	MC	Administrative Services Call with Janet Bingham; call Evergreen regarding Haverson, call Haverson.	2.00 320.00
	MC	Litigation Support Review Michael Ueltzen's report.	1.00 160.00
	MC	Litigation Support Review Michael Ueltzen's report with Hannah Schmidt; call with Michael Ueltzen and Hannah Schmidt on same.	1.60 256.00
	CAH	Litigation Support Work on litigation rebuttals, upcoming depositions, extension by opposing counsel for rebuttal of experts and last minute filing suit of Ross Miles regarding disqualification of Miller Nash. Review of filings.	2.80 1,750.00
3/22/2023	CAH	Receivership Duties Review depositions and responses to experts. Get update form Hannah Schmidt. Confer with legal counsel.	2.10 1,312.50
	HS	Litigation Support My deposition and follow up discussion with Clyde Hamstreet.	6.50 3,250.00
	MC	Litigation Support Review and comment on Michael Ueltzen rebuttal and organize supporting evidence.	4.80 768.00
3/23/2023	CAH	Litigation Support Review Michael Ueltzen's rebuttals, Riverview bank reply and Pacific Premier bank reply regarding summary judgement.	3.90 2,437.50
	HS	Receivership Duties Review draft response to Morones report and tie out related support.	3.50 1,750.00
	HS	Receivership Duties Emails regarding Mar de Plata.	1.00 500.00
	MC	Litigation Support Review and comment on Michael rebuttal and organize supporting evidence.	1.20 192.00
	CAH	Receivership Duties Respond to request of discounts on quantity lot sales and separation of Montana acreage.	0.30 187.50

		<u>Hours</u>	<u>Amount</u>
3/24/2023	CAH Receivership Duties Review numerous filings made regarding disqualification of Receiver's counsel and rebuttals to Receiver's opposition to summary judgment motions by banks.	2.70	1,687.50
3/27/2023	HS Receivership Duties Emails and calls regarding Mar de Plata.	0.30	150.00
	HS Pacific Premier Bank Review and organize documents regarding Morones rebuttal. Call with Michael Ueltzen and Martha Cohn regarding same.	6.00	3,000.00
	MC Administrative Services Enter checks, mail documents, call Evergreen.	0.80	128.00
	MC Litigation Support Call with Michael Ueltzen and Hannah Schmidt on report exhibits.	1.00	160.00
	MC Litigation Support Exhibit research, format exhibits for report.	2.90	464.00
3/28/2023	CAH Receivership Duties Review matters and attend hearings on disqualification of Miller Nash, and motions for summary judgement. Debrief with counsel and later with Hannah Schmidt and Martha Cohn. Consider option regarding mediation.	5.20	3,250.00
	HS Litigation Support Attend hearing regarding summary judgement. Debrief with counsel and Hamstreet team.	4.00	2,000.00
	HS Litigation Support Prepare for and call with Michael Ueltzen and Martha Cohn regarding damage rebuttal.	3.00	1,500.00
	MC Litigation Support Update exhibit schedules for Michael Ueltzen report.	2.20	352.00
	MC Litigation Support Call with Michael Ueltzen and Hannah Schmidt to review schedules and exhibits for reports.	2.30	368.00
	MC Administrative Services Evergreen documentation inquiries.	0.60	96.00
3/29/2023	CAH Litigation Support Work with Hannah Schmidt and Martha Cohn on damage claims. Conference call with Dave Foraker regarding summary judgement hearing.	2.10	1,312.50
	HS Litigation Support Review exhibits and draft rebuttal reports. Call with Michael Ueltzen and Martha Cohn regarding same.	3.50	1,750.00

			<u>Hours</u>	<u>Amount</u>
3/29/2023	MC	Litigation Support Final review of report exhibits and footnotes.	2.70	432.00
	MC	Litigation Support Call with Michael Ueltzen to go through Porter report.	1.50	240.00
3/30/2023	CAH	Litigation Support Work on litigation matter.	1.20	750.00
	HS	Receivership Duties Calls and emails regarding Mar de Plata.	0.50	250.00
	HS	Litigation Support Review exhibits and draft rebuttal reports. Call with Michael Ueltzen and Martha Cohn regarding same.	4.00	2,000.00
	MC	Administrative Services Call borrower; call Jesus Palomares about documents; begin setting up for quarterly reporting.	1.80	288.00
	MC	Litigation Support Review Michael Ueltzen's report with Hannah Schmidt and Michael Ueltzen.	2.10	336.00
	MC	Administrative Services Respond to emails on investors claims.	0.40	64.00
3/31/2023	CAH	Litigation Support Work on damages with Hannah Schmidt and Martha Cohn. Meet with litigation counsel. Zoom with Martha Cohn, Hannah Schmidt and Michael Ueltzen regarding damages.	3.40	2,125.00
	HS	Receivership Duties Calls and emails regarding Mar de Plata.	0.50	250.00
	HS	Litigation Support Finalize expert rebuttal reports.	0.70	350.00
	MC	Administrative Services Emails about claim transfers; update and coordinate paperwork.	0.60	96.00
	MC	Litigation Support Call with Michael Ueltzen, Hannah Schmidt, Clyde Hamstreet on damages.	1.00	160.00
	MC	Litigation Support Call with Miller Nash team, Clyde Hamstreet and Hannah Schmidt on litigation moving forward.	0.80	128.00
	MC	Litigation Support Discussion on damages with Clyde Hamstreet.	0.30	48.00
	HS	Litigation Support Call with Michael Ueltzen, Clyde Hamstreet and Martha Cohn on damages.	1.00	500.00

		<u>Hours</u>	<u>Amount</u>
3/31/2023	HS Litigation Support Call with Miller Nash team, Clyde Hamstreet and Martha Cohn on litigation moving forward.	0.80	400.00
	CAH Litigation Support Call with Hannah Schmidt, Michael Ueltzen and Martha Cohn on damages.	1.00	625.00
	CAH Litigation Support Call with Miller Nash team, Hannah Schmidt and Martha Cohn on litigation going forward.	0.80	500.00
	CAH Litigation Support Discuss damages with Martha Cohn.	0.50	312.50
<b>For professional services rendered</b>		<b>201.00</b>	<b>\$76,694.50</b>
Accounts receivable transactions			
3/31/2023	Payment invoice #2595 - Thank You. Check No. 1692		(\$45,061.50)
<b>Total payments and adjustments</b>			<b>(\$45,061.50)</b>
Balance due			<u>\$76,694.50</u>

Consultant Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Clyde A. Hamstreet - Principal	41.30	625.00	\$25,812.50
Hannah Schmidt - Consultant	74.50	500.00	\$37,250.00
Martha Cohn - Jr. Consultant	85.20	160.00	\$13,632.00

# EXHIBIT B

Client.Matter	Description	Bill Amt	Fees	Costs	Bill Num
721921.0001	American Eagle Mortgage Investment Funds	\$6,721.50	\$6,721.50	\$0.00	2206876
721921.0017	Adjunct Litigation Claims Against Ross Miles, Maureen Wile, et al. Lonnie and Cynthia Drollinger Contract Collection (Ch 7)	\$249,097.80	\$236,123.50	\$12,974.30	2206892
		\$125.00	\$125.00	\$0.00	2206877
		\$255,944.30	\$242,970.00	\$12,974.30	



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

Account: 721921.0001  
American Eagle Mortgage Investment Funds Receivership

Invoice: 2206876  
April 6, 2023

**Invoice Summary**

Professional Fees Through March 31, 2023	\$6,721.50
Disbursements	\$0.00
<b>Amount Due – Current Period:</b>	<b><u>\$6,721.50</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.

April 6, 2023

**Invoice Detail**

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/02/23	J. Knapp	0.6	Email communications with Michael Ueltzen re notice of intent to compensate (February 2023) (.2); draft notice of intent to compensate (February 2023) (.4)
03/03/23	J. Knapp	1.5	Draft motion papers re employment of Kreston BSG as auditors (1.3); email communication with Alejandro Centeno Zubia re same (.2)
03/06/23	J. Knapp	0.2	Email communications with Albert Liu re domain name (.1); email communications with Hannah Schmidt re same (.1)
03/07/23	J. Knapp	1.6	Continue drafting notice of intent to compensate (February 2023) (.4); continue drafting ex parte motion papers for employment of Kreston BSG as auditors (1.0); email communications with Alejandro Centeno Zubia and Juan Espinosa Vargas re same (.2)
03/08/23	J. Knapp	1.4	Emails with Veronica Hamstreet re notice of intent to compensate (February 2023) (.2); emails with Teri Yamauchi re notice of intent to compensate (February 2023) (.2); continue drafting notice of intent to compensate (February 2023) (.4); review filed motion papers and entered order approving employment of Kreston BSG as auditors (.2); emails with Naureen Khan re transmittal of Kreston BSG filings for uploading to website (.2); emails with Alejandro Centeno Zubia and Juan Espinosa Vargas re Kreston BSG filings (.1); email with Hannah Schmidt re same (.1)
03/08/23	J. Palomares	0.3	Virtual meeting with Hannah Schmidt and Martha Cohn re Mark Flores and Richard Shroyer demand letters
03/09/23	J. Knapp	0.4	Emails with Hannah Schmidt re approval of Kreston BSG as auditors (.1); email communications with Juan Espinosa Vargas and Alejandro Centeno Zubia re approval of Kreston BSG as auditors (.2); emails with Naureen Khan re transmittal of court filings for posting to website (.1)



April 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/10/23	J. Knapp	1.0	Finalize notice of intent to compensate (February 2023) (.6); emails with Hannah Schmidt re employment of Kreston BSG as auditors (.2); emails with Naureen Khan re transmittal of notice of intent to compensate (February 2023) for uploading to website (.2)
03/20/23	J. Knapp	0.6	Review scheduling order in AEM investors' class action and related correspondence (.2); review court docket and filings in class action (.2); email communications with Juan Espinosa Vargas re Kreston BSG employment (.2)
03/21/23	J. Knapp	0.2	Review various emails
03/22/23	J. Knapp	0.7	Emails with Juan Espinosa Vargas and Hannah Schmidt re Kreston BSG employment (.2); voicemail from and email and telephone call with Eric Doler re Julia Pond settlement payment (.3); review Julia Pond settlement documents (.2)
03/23/23	J. Knapp	0.5	Emails with Hannah Schmidt re call from Eric Doler re Julia Pond settlement payment (.2); emails with Hannah Schmidt re Kreston BSG employment (.2); email communications with Juan Espinosa Vargas re Kreston BSG employment (.1)
03/24/23	J. Knapp	0.3	Review court docket (.1); emails with Hannah Schmidt re notice of intent to compensate (February 2023) (.2)
03/30/23	J. Knapp	1.0	Emails with Francine Handy re Roderick Bosch notice of claim transfer (.2); review notice of claim transfer (.2); review order reducing allowed amounts of certain investor claims (.1); emails with Martha Cohn re notice of claim transfer (.3); review claims register (.2)
03/31/23	J. Knapp	0.2	Emails with Martha Cohn re Roderick Bosch notice of claim transfer (.1); email communications with Forge Trust re same (.1)
03/31/23	J. Palomares	0.4	Telephone conference with Klickitat County Auditor re electronic recording for fulfillment deed to release Halverson property from AEI contract

April 6, 2023

**Fee Summary**

<b><u>Professional</u></b>	<b><u>Title</u></b>	<b><u>Time</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
J. Knapp	Partner	10.2	\$625	\$6,375.00
J. Palomares	Partner	0.7	495	346.50
<b>Summary Total:</b>		<b>10.9</b>		<b>\$6,721.50</b>

**Invoice Summary**

Professional Fees Through March 31, 2023	\$6,721.50
Disbursements	<u>\$0.00</u>
<b>Amount Due - Current Period:</b>	<b><u>\$6,721.50</u></b>



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

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

Invoice: 2206892  
April 6, 2023

**Invoice Summary**

Professional Fees Through March 31, 2023	\$236,123.50
Disbursements	<u>\$12,974.30</u>
<b>Amount Due – Current Period:</b>	<b><u>\$249,097.80</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.

April 6, 2023

**Invoice Detail**

<b><u>Date</u></b>	<b><u>Professional</u></b>	<b><u>Time</u></b>	<b><u>Description of Services</u></b>
03/01/23	K. Bennett	0.4	Revise letter to Kristin Asai
03/01/23	E. Decker	5.1	Virtual meeting with Tom Sand, Joe Vance, Lorien Giles, Mark Tyler, and Lisa Peterson re response to bank defendants' summary judgment motions (.8); virtual meeting with Mark Tyler, Lorien Giles, and Estera Gordon re strategy for response to summary judgment motions (.4); virtual meeting with Joe Vance re letter to Pacific Premier Bank re privilege logs and defendants' summary judgment briefs (.4); revise draft letter to Pacific Premier Bank re privilege logs (.2); analyze Riverview Bank's motion for summary judgment and supporting evidence (3.0); call with counsel for Riverview Bank re discovery issues (.3)
03/01/23	L. Giles	5.1	Virtual meeting with Joe Vance, Tom Sand, Edward Decker, Lorien Giles, Mark Tyler, and Lisa Peterson re response to bank defendants' summary judgment motions (.8); virtual meeting re strategy for response to summary judgment motions (.4); develop fact table and review cases cited in briefs (3.9)
03/01/23	E. Gordon	2.0	Review bank defendants' summary judgment motions (1.6); virtual meeting with Edward Decker, Lorien Giles, and Mark Tyler re strategy for response to summary judgment motions (.4)
03/01/23	L. Peterson	2.9	Review Pacific Premier Bank's and Riverview Bank's motions for summary judgment (1.3); continue to organize transcripts for digesting (.5); email to Mark Tyler re same (.1); calls with Heather Harmon and Joseph Vance re transcripts (.2); virtual meeting with Tom Sand, Joe Vance, Lorien Giles, Mark Tyler, and Edward Decker re response to bank defendants' summary judgment briefs motions (.8)

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/01/23	T. Sand	2.8	Review and revise letter to Kristin Asai re privilege (.3); review bank defendants' motions for summary judgment (1.7); virtual meeting with Joe Vance, Edward Decker, Lorien Giles, Mark Tyler, and Lisa Peterson re response to bank defendants' summary judgment motions (.8)
03/01/23	M. Tyler	5.9	Review Pacific Premier Bank's motion for summary judgment and supporting documents (1.9); review Riverview Bank's motion for summary judgment and supporting documents (1.0); virtual meeting with Edward Decker, Tom Sand, Joe Vance, Lorien Giles, and Lisa Peterson re response to bank defendants' summary judgment motions (.8); virtual meeting with Edward Decker, Lorien Giles, and Estera Gordon re strategy for response to summary judgment motions (.4); review cases cited by Riverview Bank to support summary judgment motion (1.8)
03/01/23	J. Vance	6.0	Virtual meeting re response to bank defendants' summary judgment motions (.8); virtual meeting with Edward Decker (.4); analyze bank defendants' summary judgment motions (4.8)
03/02/23	E. Decker	5.1	Virtual meeting with Joe Vance re response to bank defendants' motions for summary judgment (.2); analyze case research of Riverview Bank's motion (1.0); virtual meeting with Tom Sand, Joe Vance, Hannah Schmidt, and Mike Ueltzen re bank defendants' expert reports (.8); virtual meeting with Joe Vance and Hannah Schmidt re bank defendants' motions for summary judgment (.6); analyze Riverview Bank's motion for summary judgment and supporting materials (1.5); draft outline of opposition to bank defendants' motions for summary judgment (1.0)
03/02/23	L. Giles	2.6	Legal research for response to summary judgment motions
03/02/23	H. Harmon	0.1	Prepare three volumes of Hannah Schmidt deposition and exhibits for transmittal to Michael Ueltzen
03/02/23	L. Peterson	0.4	Correspondence to Clyde Hamstreet and Hannah Schmidt with deposition transcripts for review and correction

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/02/23	T. Sand	1.2	Virtual meeting with Joe Vance, Edward Decker, Hannah Schmidt, and Mike Ueltzen re bank defendants' expert reports (.8); review expert reports (.4)
03/02/23	M. Tyler	6.7	Continue review of cases cited by Riverview Bank to support summary judgment motion (6.5); review and provide feedback on response themes (.2)
03/02/23	J. Vance	6.5	Virtual meeting with Edward Decker re response to bank defendants' motions for summary judgment (.2); virtual meeting with Tom Sand, Edward Decker, Hannah Schmidt, and Mike Ueltzen re bank defendants' expert reports (.8); virtual meeting with Edward Decker and Hannah Schmidt re bank defendants' motions for summary judgment (.6); analyze and outline issues for response to bank defendants' motions for summary judgment (4.9)
03/03/23	E. Decker	4.8	Virtual meeting with Joe Vance re summary judgment briefs (.4); draft outline of opposition to bank defendants' motions for summary judgment (4.4)
03/03/23	L. Giles	4.7	Revise fact table and compare with briefs (3.5); research cases cited in briefing (1.2)
03/03/23	H. Harmon	1.2	Assist with preparation of inventory of documents provided to expert Gary Stoley for production to opposing counsel
03/03/23	L. Peterson	3.1	Review and respond to email from Hannah Schmidt re additional documents provided to Michael Ueltzen, and update spreadsheet and ShareFile re same (.3); emails with Heather Harmon re and review and update spreadsheet of documents provided to expert (1.4); telephone call from Joseph Vance re documents provided to expert (.1); review lists of documents provided to expert and locate and Bates number versions of documents provided previously as unnumbered (1.3)
03/03/23	T. Sand	1.2	Review draft introduction of argument for response to motions for summary judgment (.6); analyze charts and graphs for use at oral argument (.4); review letter from Kristin Asai re privilege issues (.2)

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/03/23	M. Tyler	3.7	Research and write-up regarding Ponzi presumption under the Uniform Fraudulent Transfers Act for response to summary judgment motions (1.9); review and feedback re motion for summary judgment response outline (.2); draft statement of facts section for response to summary judgment motions (1.6)
03/03/23	J. Vance	2.5	Review correspondence from Pacific Premier Bank re discovery (.5); review documents provided to expert (.5); review issues for response to motions for summary judgment (1.5)
03/05/23	E. Decker	0.7	Draft outline of response to bank defendants' motions for summary judgment
03/05/23	M. Tyler	1.1	Legal research
03/06/23	E. Decker	4.6	Virtual meeting with Ben Shattuck re motion for protective order (.1); virtual meeting with Joe Vance re opposition to bank defendants' motions for summary judgment and motion for protective order (.3); draft response to bank defendants' motions for summary judgment (3.2); research case law in support of response to summary judgment motions (1.0)
03/06/23	L. Giles	5.7	Legal research for response to summary judgment motions
03/06/23	T. Sand	0.5	Email Benjamin Shattuck and Edward Decker re PPB insurance coverage lawsuit (.1); email Kristin Asai re discovery dispute (.1); review outline for response to summary judgment motions (.3)
03/06/23	B. Shattuck	2.6	Virtual meeting with Joe Vance to discuss motion for protective order (.1); review docket of Pacific Premier v. Zurich America Insurance Company for developments in case and related emails (.3); review letters exchanged between Pacific Premier Bank and receiver re receiver's privilege log and outline arguments of letters (1.8); review case law cited in letters re receiver's privilege log (.3); virtual meeting with Edward Decker re protective order (.1)

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/06/23	M. Tyler	6.0	Continue research and drafting of fact section for response to summary judgment motions
03/06/23	J. Vance	3.5	Virtual meeting with Edward Decker (.3); analyze and outline issues for response to summary judgment motions (1.7); exchange communications with Pacific Premier Bank's counsel re discovery issues (.5); analyze discovery issues (1.0)
03/07/23	E. Decker	4.7	Virtual meeting with Tom Sand, Joe Vance, Lisa Peterson, Mark Tyler, Lorien Giles, and Ben Shattuck re discovery, expert reports, and summary judgment briefing (.4); virtual meeting with Mark Tyler re summary judgment briefing (.2); virtual meeting with Lorien Giles re summary judgment briefing (.2); virtual meeting with Ben Shattuck re research on aiding and abetting liability (.1); research case law in support of summary judgment briefing (2.5); draft outline of response to bank defendants' motions for summary judgment (1.3)
03/07/23	L. Giles	0.9	Virtual meeting with Edward Decker re summary judgment briefing (.2); virtual meeting with Tom Sand, Joe Vance, Edward Decker, Mark Tyler, Ben Shattuck, and Lisa Peterson re discovery, expert reports, and summary judgment briefing (.4); review protective order (.3)
03/07/23	L. Peterson	1.4	Virtual meeting with Tom Sand, Joe Vance, Edward Decker, Mark Tyler, Lorien Giles, and Ben Shattuck re discovery, expert reports, and summary judgment briefing (.4); review email from Hannah Schmidt re additional documents to Michael Ueltzen (.1); organize additional deposition transcripts for digesting and email to Ben Shattuck re same (.2); update ShareFile of documents provided to expert with replacement Bates numbered copies of documents (.7)
03/07/23	T. Sand	0.9	Review and revise trial preparation memo (.5); virtual meeting with Joe Vance, Edward Decker, Lorien Giles, Mark Tyler, Ben Shattuck, and Lisa Peterson re discovery experts and motion for summary judgment briefs (.4)



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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/07/23	B. Shattuck	4.0	Review case law re privilege log (1.2); virtual meeting with Joe Vance, Edward Decker, Tom Sand, Lorien Giles, Mark Tyler, and Lisa Peterson re discovery, expert reports, and summary judgment briefing (.4); review transcripts of Pacific Premier Bank's 30(b)(6) deposition of receiver to determine outstanding topics (2.3); virtual meeting with Edward Decker re research on aiding and abetting liability (.1)
03/07/23	M. Tyler	4.4	Continue research and drafting of fact section for response to summary judgment motions (3.8); virtual meeting with Edward Decker re summary judgment briefing (.2); virtual meeting with Edward Decker, Tom Sand, Joe Vance, Lorien Giles, Ben Shattuck, and Lisa Peterson re discovery, expert reports, and summary judgment briefing (.4)
03/07/23	J. Vance	2.8	Virtual meeting with Tom Sand, Edward Decker, Lisa Peterson, Mark Tyler, Lorien Giles, and Ben Shattuck (.4); analyze issues for response to summary judgment motions (1.5); outline issues for trial (.9)
03/08/23	E. Decker	6.7	Virtual meeting with Joe Vance and Tom Sand re strategy for demonstrative exhibits for trial (1.3); virtual meeting with Lorien Giles re summary judgment briefing (.4); research case law in support of summary judgment briefing (2.0); revise draft fact section of opposition to Riverview Bank's motion for summary judgment (.6); draft arguments in response to bank defendants' motions for summary judgment (2.4)
03/08/23	L. Giles	5.7	Virtual meeting with Edward Decker re summary judgment briefing (.4); research and draft section for response to summary judgment motions (5.3)
03/08/23	E. Gordon	0.3	Review and comment on high-level outline for summary judgment response

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/08/23	T. Sand	2.5	Review and update trial preparation to-do list (.7); virtual meeting with Joe Vance and Edward Decker re strategy for demonstrative exhibits for trial (1.3); review notice of deposition (.1); revise La Pine loan chart (.2); email Kristin Asai re discovery issues (.1); email Chip Paternoster re Riverview Bank discovery (.1)
03/08/23	B. Shattuck	2.0	Review transcripts of Pacific Premier Bank's 30(b)(6) deposition of receiver to determine outstanding topics and related emails
03/08/23	J. Vance	1.3	Virtual meeting with Tom Sand and Edward Decker re strategy for demonstrative exhibits for trial
03/09/23	E. Decker	3.8	Virtual meeting with Mark Tyler re facts and evidence for summary judgment briefing (.4); virtual meeting with Loren Giles re legal research for summary judgment briefing (.4); revise draft arguments on aiding and abetting liability (1.5); draft arguments on fraudulent transfer act claims (1.5)
03/09/23	L. Giles	6.9	Virtual meeting with Edward Decker re legal research for summary judgment briefing (.4); draft fact section for response to summary judgment motions (4.4); revise section for response to summary judgment motions (2.1)
03/09/23	T. Sand	0.7	Virtual meeting with Joe Vance re status of settlement discussions and deposition of Hannah Schmidt (.2); email defendants' counsel re discovery issues (.2); review and revise initial draft of La Pine loan demonstrative chart (.3)
03/09/23	M. Tyler	5.2	Draft section on negligence claims for response to summary judgment motions (1.9); virtual meeting with Edward Decker re facts and evidence for summary judgment briefing (.4); revise fact section for response to summary judgment motions (2.9)
03/09/23	J. Vance	2.7	Review and comment on proposed order (.2); telephone call with Chip Paternoster (.4); telephone call with Hannah Schmidt (.8); virtual meeting with Tom Sand re status of settlement discussions and deposition of Hannah Schmidt (.2); outline issues for trial (1.1)

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/10/23	E. Decker	5.3	Draft response to bank defendants' motions for summary judgment
03/10/23	L. Giles	5.5	Revise fact section for response to summary judgment motions and collect supporting documents
03/10/23	L. Peterson	4.1	Review and respond to emails from Hannah Schmidt re additional documents to Michael Ueltzen and update ShareFile and list of documents (.6); telephone calls with Edward Decker, Mark Tyler, and Lorien Giles re confidential documents cited in response to summary judgment motions (.5); review and analyze fact sections and prepare summaries of Riverview Bank and Pacific Premier Bank documents cited (3.0)
03/10/23	T. Sand	0.6	Review first draft of fact section for response to summary judgment motions (.4); email to counsel re redaction to confidential exhibits (.2)
03/10/23	B. Shattuck	3.8	Research case law re privilege logs (2.2); outline motion for protective order re privilege log (1.6)
03/10/23	M. Tyler	4.2	Compile list of documents and citations used to support facts for response to summary judgment motions (.4); continue drafting negligence section for response to summary judgment motions (2.3); revise combined statement of facts for response to summary judgment motions (1.5)
03/10/23	J. Vance	0.4	Prepare for attend virtual meet and confer with Kristin Asai re PPB discovery issues
03/11/23	J. Vance	1.7	Revise draft of response to summary judgment motions
03/12/23	E. Decker	2.0	Revise draft response to bank defendants' summary judgment motions
03/12/23	L. Giles	1.8	Revise fact section of response to summary judgment motions
03/13/23	E. Decker	5.6	Draft response to bank defendants' motions for summary judgment

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/13/23	L. Giles	6.3	Review bank defendants' citations to deposition transcripts for accuracy (2.8); draft and revise sections for response to summary judgment motions (3.5)
03/13/23	E. Gordon	3.8	Review and edit draft statement of facts for response to summary judgment motions
03/13/23	H. Harmon	0.5	Prepare depositions and exhibits for Eric Landon and Jule Webster for attorney review and loading to case file (.2); update case docketing and arrangements for rescheduled deposition of Hannah Schmidt (.1); prepare additional deposition transcripts and exhibits for bank witnesses to send to class action plaintiffs' counsel (.2)
03/13/23	L. Peterson	1.2	Review and respond to emails from Hannah Schmidt with additional documents provided to Michael Ueltzen, and update Michael Ueltzen ShareFile and spreadsheet of documents
03/13/23	T. Sand	0.1	Review deposition schedule
03/13/23	B. Shattuck	2.0	Research case law for motion for protective order re disclosure of receiver's work product
03/13/23	M. Tyler	3.1	Revise section on negligence claims for response to summary judgment motions (1.9); research discovery database to support for factual claims in response to summary judgment motions (1.2)
03/13/23	J. Vance	2.5	Exchange communications with Hannah Schmidt (.5); exchange communications with opposing counsel re discovery issues (.4); analyze and outline issues for trial (1.6)
03/14/23	E. Decker	5.2	Virtual meeting with Joe Vance, Tom Sand, Mark Tyler, Lisa Peterson, Lorien Giles, and Ben Shattuck re summary judgment briefing, expert discovery, and upcoming depositions (.3); draft response to bank defendants' summary judgment motions (4.9)

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/14/23	L. Giles	7.4	Virtual meeting re summary judgment briefing, expert discovery, and upcoming depositions (.3); revise combined statement of facts, brief, and review documents for additional evidentiary support (7.1)
03/14/23	E. Gordon	3.1	Review and comment on draft response to summary judgment motions
03/14/23	L. Peterson	3.8	Review email from Martha Cohn with document to Michael Utley, update ShareFile and list and email to Hannah Schmidt re same (.2); virtual meeting with Joe Vance, Tom Sand, Mark Tyler, Edward Decker, Lorien Giles, and Ben Shattuck re summary judgment briefing, expert discovery, and upcoming depositions (.3); review email from Kristin Asai re documents cited in expert report by Gary Stoley, research status of documents and email to Joe Vance with findings (1.0); review draft of response to motions for summary judgment and continue to organize exhibits for declaration of Joe Vance (2.3)
03/14/23	T. Sand	0.9	Virtual meeting with Joe Vance, Edward Decker, Mark Tyler, Lorien Giles, Ben Shattuck, and Lisa Peterson re motion for summary judgment briefing, expert discovery, and upcoming depositions (.3); review draft response to bank defendants' summary judgment motions (.6)
03/14/23	B. Shattuck	0.3	Virtual meeting with Joe Vance, Tom Sand, Edward Decker, Lorien Giles, Mark Tyler, and Lisa Peterson re expert discovery, summary judgment briefing, and upcoming depositions
03/14/23	M. Tyler	3.5	Revise facts section of response to summary judgment motions (1.9); virtual meeting with Edward Decker, Lorien Giles, Tom Sand, Joe Vance, Ben Shattuck, and Lisa Peterson (.3); insert statement of facts into body of summary judgment response and review entire response to update citations (1.3)

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/14/23	J. Vance	3.8	Telephone call with Kristin Asai re expert depositions (.2); follow up with experts re deposition scheduling (.2); analyze issues related to discovery (1.0); outline issues for trial (1.5); virtual meeting re summary judgment briefing, expert discovery, and upcoming depositions (.3); review draft response to summary judgment motions (.6)
03/15/23	E. Decker	4.8	Draft response to bank defendants' summary judgment motions
03/15/23	L. Giles	4.5	Revise response to summary judgment motions and related communications
03/15/23	E. Gordon	4.5	Continue to review and comment on draft response to summary judgment motions
03/15/23	H. Harmon	1.7	Assist with preparation of exhibits to Joe Vance declaration in opposition to summary judgment motions, including preparation of deposition transcript excerpts and considerations for filing motion to seal confidential exhibits
03/15/23	L. Peterson	9.1	Research and resolve issues regarding production of RMV documents (1.5); virtual meeting with Edward Decker re exhibits to summary judgment brief (.2); virtual meeting with Heather Harmon re response to motions for summary judgment and supporting declarations (.4); continue to review and analyze cited documents and depositions in response brief, prepare spreadsheet to organize exhibits, and prepare exhibits (7.0)
03/15/23	T. Sand	2.9	Review and revise response to bank defendants' summary judgment motions (2.8); email Kristin Asai re confidential exhibits (.1)
03/15/23	B. Shattuck	2.9	Draft factual background section of motion for protective order re disclosure of receiver's internal communications
03/15/23	M. Tyler	2.3	Draft Hannah Schmidt declaration in support of response to summary judgment motions
03/15/23	J. Vance	2.5	Revise and edit response to summary judgment motions

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/16/23	E. Decker	6.6	Draft response to bank defendants' summary judgment motions (6.1); revise draft Schmidt declaration in support of response brief (.5)
03/16/23	L. Giles	7.9	Review documents for use in briefing and revise and edit response to summary judgment motions
03/16/23	E. Gordon	2.0	Continue to review and comment on draft response to summary judgment motions
03/16/23	H. Harmon	3.5	Assist with preparation of Joe Vance declaration in opposition to summary judgment motions and revisions to response brief for declaration citations
03/16/23	L. Peterson	8.6	Continue to review and analyze cited documents and depositions in response brief, prepare spreadsheet to organize exhibits, and prepare exhibits
03/16/23	T. Sand	0.7	Review draft response brief and supporting documents
03/16/23	M. Tyler	5.1	Update citations and exhibits for response to summary judgment motions (3.8); finalize Hannah Schmidt declaration (1.3)
03/16/23	J. Vance	2.5	Revise and edit response pleadings to summary judgment motions (2.2); exchange emails with defendants re expert depositions (.3)
03/17/23	E. Decker	3.6	Telephone call with Hannah Schmidt re summary judgment opposition brief and supporting declaration (.2); draft response to bank defendants' summary judgment motions (3.4)
03/17/23	L. Giles	6.4	Review and edit response to summary judgment motions
03/17/23	H. Harmon	4.0	Assist with finalization of pleadings for response to summary judgment motions and electronic filing and distribution, including declaration exhibits subject to motion to file under seal for opposing counsel review

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/17/23	L. Peterson	6.6	Virtual meetings and emails re response and declarations to motions for summary judgment, and address issues re filing documents under seal (1.0); review revised response to motions for summary judgment and continue to prepare and finalize exhibits to support declaration of Joe Vance in response to motions for summary judgment (5.0); review emails re Hannah Schmidt's declaration (.1); review and respond to emails from Hannah Schmidt re additional documents provided to Michael Ueltzen (.2); update ShareFile and spreadsheet of documents provided to Michael Ueltzen (.3)
03/17/23	T. Sand	1.0	Review final draft of response to bank defendant's summary judgment motions (.8); email Kristin Asai and Hannah Schmidt re receiver's response to summary judgment motions (.2)
03/17/23	B. Shattuck	7.1	Continue drafting motion for protective order and related legal research
03/17/23	M. Tyler	1.4	Draft motion to file under seal
03/17/23	J. Vance	3.5	Exchange communications with parties re expert deposition scheduling (.2); outline arguments for motion for protective order (.2); revise and finalize pleadings for response to summary judgment motions (3.1)
03/19/23	B. Shattuck	5.0	Continue drafting motion for protective order
03/20/23	E. Decker	1.9	Virtual meeting with Joe Vance, Tom Sand, Lisa Peterson, Lorien Giles, Ben Shattuck, and Mark Tyler re discovery, expert reports, summary judgment, and trial preparation (.7); virtual meeting with AEM investors' counsel re update on pending litigation against banks (.5); revise draft players list (.3); emails with AEM investors' counsel re Riverview Bank matters (.4)
03/20/23	D. Foraker	0.5	Virtual meeting with Mike Esler, Jon Hunt, Bridget Donegan, John Rake, Joe Vance, and Edward Decker re update on pending litigation against banks



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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/20/23	L. Giles	5.2	Virtual meeting with Edward Decker, Joe Vance, Tom Sand, Mark Tyler, Ben Shattuck, and Lisa Peterson re discovery, expert reports, and trial preparation (.7); review confidentiality email from Peter Hawkes (.2); review opposing expert reports to prepare rebuttal (4.3)
03/20/23	L. Peterson	0.9	Update document index (.2); virtual meeting with Joe Vance, Tom Sand, Edward Decker, Mark Tyler, Ben Shattuck, and Lorien Giles (.7)
03/20/23	B. Shattuck	5.5	Complete first draft of motion for protective order (4.8); virtual meeting with Joe Vance, Tom Sand, Edward Decker, Lorien Giles, Mark Tyler, and Lisa Peterson (.7)
03/20/23	M. Tyler	2.1	Compile and organize list of deposition transcripts for summarizing (.2); virtual meeting with Edward Decker, Joe Vance, Tom Sand, Lorien Giles, Ben Shattuck, and Lisa Peterson re discovery, expert reports, and trial preparation (.7); prepare summary of deposition of Suzanne Nichols (1.2)
03/20/23	J. Vance	2.5	Virtual meeting with AEM Investors' counsel re update on pending litigation against banks (.5); virtual meeting with Tom Sand, Edward Decker, Mark Tyler, Lorien Giles, Ben Shattuck, and Lisa Peterson (.7); review and revise motion for protective order (.5); outline issues for trial (.8)
03/21/23	L. Giles	4.1	Review documents for confidentiality designation (2.9); review expert reports (1.2)
03/21/23	L. Peterson	1.0	Review email from Peter Hawkes requesting de-designation of confidentiality for certain documents, and prepare documents for attorney review
03/21/23	T. Sand	1.7	Begin preparations of jury instructions and verdict form
03/21/23	M. Tyler	4.4	Complete summary of deposition of Suzanne Nichols (1.6); prepare summary of deposition of Lynn Barnett (2.8)
03/21/23	J. Vance	2.0	Conference with Hannah Schmidt (.5); prepare for deposition (1.0); exchange communications with other parties re expert deposition scheduling (.5)

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/22/23	E. Decker	3.4	Appear at deposition of Hannah Schmidt
03/22/23	L. Peterson	0.1	Review Streamline invoice for February expenses for accuracy and email to Joe Vance for approval
03/22/23	B. Shattuck	1.5	Revise and edit motion for a protective order
03/22/23	M. Tyler	1.6	Continue preparing summary of deposition of Lynn Barnett
03/22/23	J. Vance	7.3	Prepare for and defend Hannah Schmidt deposition and related conferences with Hannah Schmidt
03/23/23	E. Decker	0.5	Revise draft motion for protective order
03/23/23	H. Harmon	1.2	Prepare judge's working copy of response to motions for summary judgment and coordinate delivery to courthouse (.5); prepare citation for motion for protective order regarding receiver's internal communications (.2); prepare order granting unopposed motion to file under seal (.3); prepare sealed cover pages for filing of confidential exhibits to declaration of Joseph Vance (.2)
03/23/23	B. Shattuck	1.4	Draft declaration in support of motion for protective order
03/23/23	M. Tyler	4.4	Appear at deposition of Sherry Beattie
03/23/23	J. Vance	2.5	Exchange communications with court clerk re motion to seal (.2); review and approve order granting motion to seal (.2); revise and edit motion for protective order (.8); review reply briefs in support of bank defendants' summary judgment motions (.8); outline issues for trial (.5)
03/24/23	E. Decker	0.2	Revise draft motion for protective order
03/24/23	L. Giles	5.4	Review bank defendants' replies in support of summary judgment motions and research cases cited in reply briefs

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/24/23	H. Harmon	1.8	Prepare declaration of Joe Vance in support of motion for protective order regarding receiver's communications, including exhibits (.4); assist with finalization of motion for protective order pleadings and response to motion to disqualify pleadings for electronic filing and distribution (.6); coordinate delivery of judge's working copies of pleadings and sealed exhibits to declaration of Joe Vance to courthouse (.5); telephone call with court clerk regarding electronic filing of sealed documents pursuant to court order (.3)
03/24/23	T. Sand	0.5	Review reply briefs in support of summary judgment motions
03/24/23	B. Shattuck	5.5	Legal research for summary judgment hearing preparation
03/24/23	M. Tyler	1.6	Continue preparing summary of deposition of Lynn Barnett
03/24/23	J. Vance	7.5	Analyze reply briefs in support of summary judgment motions (2.0); outline oral argument (5.5)
03/26/23	L. Giles	3.8	Legal research for summary judgment hearing preparation
03/26/23	B. Shattuck	3.8	Legal research for summary judgment hearing preparation
03/27/23	E. Decker	1.3	Analyze bank defendants' replies in support of summary judgment motions
03/27/23	L. Giles	4.3	Legal research for summary judgment hearing preparation
03/27/23	L. Peterson	0.5	Review emails re deposition transcripts and exhibits of Eric Landon and Jule Webster, update deposition transcript index, organize same for digesting, and email to Mark Tyler (.4); review email from Mark Tyler re summary of Sherry Beattie deposition (.1)
03/27/23	T. Sand	0.2	Review summary of Sherry Beattie deposition

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<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/27/23	B. Shattuck	4.2	Legal research case law for summary judgment hearing preparation
03/27/23	M. Tyler	0.4	Prepare summary of deposition of Sherry Beattie
03/27/23	J. Vance	5.5	Prepare for oral argument on summary judgment motions
03/28/23	E. Decker	0.9	Telephone conference with Joe Vance re court rulings and next steps (.3); analyze draft rebuttal report (.6)
03/28/23	D. Foraker	0.2	Emails with John Stephens, Joe Vance, and Bridget Donegan re court rulings on defendants' motions and re trial dates
03/28/23	H. Harmon	0.2	Submit order for recording of March 28, 2023, hearing
03/28/23	T. Sand	0.8	Review Mark Tyler's report on hearing and plan next steps in case
03/28/23	B. Shattuck	1.5	Review sample jury instructions from Tom Sand (.9); research re preserving issues for appeal (.6)
03/28/23	M. Tyler	4.3	Attend hearing on motions for disqualification and for summary judgment (2.7); prepare summary of hearing for litigation team (.4); update and compile background information for key players list (1.2)
03/28/23	J. Vance	4.5	Prepare for and attend hearing on bank defendants' summary judgment motions (4.0); telephone conference with Edward Decker re court rulings and next steps (.3); emails with John Stephens, David Foraker, and Bridget Donegan re court rulings on defendants' motions and trial dates (.2)

April 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/29/23	E. Decker	1.8	Virtual meeting with David Foraker re damages analysis on bank claims and re preparation for mediation and trial (.3); virtual meeting with Eric English (Pacific Premier Bank's special settlement counsel) and Joe Vance re potential settlement of receiver's claims (.3); follow-up research re meeting with Pacific Premier Bank (.1); virtual meeting with Tom Sand and Joe Vance re strategy for settlement and trial (.4); revise draft rebuttal expert reports (.6); analyze Pacific Premier Bank's opposition to motion for protective order (.1)
03/29/23	D. Foraker	1.8	Telephone conference with Clyde Hamstreet re case strategy in light of 3/28 court rulings (.3); emails with Mike Esler re 3/28 rulings and status of entry of orders (.1); virtual meeting with Edward Decker re damages analysis on bank claims and re preparation for mediation and trial (.3); review Mark Tyler's report on 3/28 hearing and rulings (.1); virtual meeting with Tom Sand re case strategy in light of 3/28 court rulings (.7); email with Tom Sand, Joe Vance, and Edward Decker re organization and agenda for litigation team meeting and related emails (.3)
03/29/23	L. Giles	5.4	Review expert rebuttal report
03/29/23	T. Sand	2.9	Virtual meeting with David Foraker re case strategy in light of 3/28 rulings (.7); virtual meeting with Joe Vance and Edward Decker re trial preparation and settlement negotiations (.4); virtual meeting with Eric English (Pacific Premier Bank's special settlement counsel) re settlement negotiations (.5); review analysis of reconsideration and appeal of court's 3/28 ruling on fraudulent transfer claims against Riverview Bank (.3); plan strategy for trial preparation (.7); review updated players roster for trial witnesses (.3)
03/29/23	B. Shattuck	1.3	Review Pacific Premier Bank's opposition to receiver's motion for protective order (.3); research re appeals of interlocutory summary judgment orders under Washington law (1.0)
03/29/23	M. Tyler	1.8	Continue updating and compiling key player list

April 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/29/23	J. Vance	0.7	Virtual meeting with Eric English (Pacific Premier Bank's special settlement counsel) and Edward Decker re potential resolution of receiver's claims (.3); virtual meeting with Tom Sand and Edward Decker re strategy (.4)
03/30/23	E. Decker	1.8	Virtual meeting with Joe Vance and Ben Shattuck re motion for protective order (.4); analyze Pacific Premier Bank's opposition to protective order (.2); virtual meeting with Joe Vance re expert discovery and upcoming conference with counsel (.3); revise draft rebuttal expert report (.6); virtual meeting with Lorien Giles re draft rebuttal expert report (.1); correspond with bank defendants' counsel re depositions and other upcoming deadlines (.2)
03/30/23	B. Esler	0.1	Virtual meeting with Ben Shattuck re appeal of summary judgment orders
03/30/23	D. Foraker	0.2	Review email from Tom Sand re communications with Pacific Premier Bank's special settlement counsel and related emails
03/30/23	L. Giles	3.7	Review and comment on expert report
03/30/23	H. Harmon	0.6	Obtain video of March 28, 2023, hearing and prepare for attorney review (.5); prepare attorney working notebook for motion for protective order hearing (.1)
03/30/23	T. Sand	1.4	Telephone conference with Eric English re PPB's settlement proposal (.3); email to Joe Vance and David Foraker re PPB settlement strategy (.2); email to Ben Shattuck re jury instructions (.5); email to counsel re expert depositions (.1); review draft court order on motion for summary judgment (.1); review strategy options for appeal of motion for summary judgment ruling (.2)

April 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/30/23	B. Shattuck	3.5	Virtual meeting with Joe Vance and Edward Decker re motion for protective order (.4); research re motion for protective order and prepare file memorandum re same (2.8); virtual meeting with Brian Esler re appeals of summary judgment orders (.1); email to Joe Vance re same (.2)
03/30/23	J. Vance	3.5	Analyze Pacific Premier Bank's opposition to motion for protective order (.5); review Riverview Bank's proposed order on summary judgment motions (.3); exchange communications with experts re scheduling of expert depositions (.3); exchange communications with opposing counsel re scheduling issues (.3); communications with Tom Sand re PPB mediation (.3); virtual meeting with Edward Decker and Ben Shattuck re motion for protective order (.4); virtual meeting with Edward Decker re expert discovery and upcoming conference with counsel (.3); outline issues for trial (1.1)
03/31/23	E. Decker	3.3	Revise draft rebuttal expert reports (2.1); virtual meeting with Lorien Giles re rebuttal expert reports (.5); correspond with counsel for bank defendants re expert depositions (.5); virtual meeting with Lisa Peterson re revised privilege log (.2)
03/31/23	D. Foraker	1.1	Telephone conference with Clyde Hamstreet re PPB mediation proposal (.2); related emails with litigation team and with Clyde Hamstreet and Hannah Schmidt re PPB mediation proposal (.2); virtual meeting with Clyde Hamstreet, Hannah Schmidt, Tom Sand, and Joe Vance re PPB mediation (.7)
03/31/23	L. Giles	3.5	Finalize Michael Ueltzen reports (3.0); virtual meeting with Edward Decker re rebuttal expert reports (.5)
03/31/23	H. Harmon	0.7	Assist with finalization of Michael Ueltzen's rebuttal reports regarding experts Morones and Porter, including exhibits, and prepare for distribution
03/31/23	L. Peterson	0.5	Download and organize expert exhibits from ShareFile and email to Joe Vance re same (.3); virtual meeting with Edward Decker re revised privilege log (.2)

April 6, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/31/23	T. Sand	2.8	Virtual meeting with Clyde Hamstreet, Hannah Schmidt, David Foraker, and Joe Vance re PPB mediation (.7); email to Mike Hogan re PPB mediation (.3); email to counsel re expert reports and trial planning conference (.2); review trial plan and prepare for team strategy meeting (1.6)
03/31/23	J. Vance	2.2	Virtual meeting with Clyde Hamstreet, Hannah Schmidt, Tom Sand, and David Foraker re PPB mediation (.7); prepare for and attend hearing on motion for protective order (1.5)

**Fee Summary**

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
T. Sand	Partner	26.3	\$865	\$22,749.50
D. Foraker	Partner	3.8	685	2,603.00
B. Esler	Partner	0.1	660	66.00
J. Vance	Partner	80.4	580	46,632.00
E. Gordon	Special Counsel	15.7	550	8,635.00
E. Decker	Partner	83.7	505	42,268.50
L. Giles	Associate	106.8	425	45,390.00
K. Bennett	Associate	0.4	410	164.00
M. Tyler	Associate	73.2	395	28,914.00
B. Shattuck	Associate	57.9	370	21,423.00
L. Peterson	Paralegal	44.2	305	13,481.00
H. Harmon	Paralegal	15.5	245	3,797.50
<b>Summary Total:</b>		<b>508.0</b>		<b>\$236,123.50</b>



April 6, 2023

**Disbursement Summary**

<b><u>Disbursements</u></b>	<b><u>Amount</u></b>
Extraordinary postage	\$20.95
Naegeli Deposition and Trial; Invoice#: 19654; Video copies of the depositions of Jule Webster and Eric Landon	1,686.85
Naegeli Deposition and Trial; Invoice#: 19653; Transcript copies of the depositions of Jule Webster and Eric Landon	1,805.94
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6421890; Transcript services and litigation package	578.00
Streamline Imaging (ACH); Invoice#: 37511; February search services and data/hosting usage	3,413.91
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6454996; Deposition of Hannah Schmidt 3/22/2023	1,243.15
Naegeli Deposition and Trial; Invoice#: 18580; Transcript services for Daniel Cox deposition	2,330.50
Naegeli Deposition and Trial; Invoice#: 18581; Video transcripts for Daniel Cox deposition	1,895.00
<b>Disbursement Total:</b>	<b>\$12,974.30</b>

**Invoice Summary**

Professional Fees Through March 31, 2023	\$236,123.50
Disbursements	<u>\$12,974.30</u>
<b>Amount Due - Current Period:</b>	<b><u>\$249,097.80</u></b>



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

Account: 721921.0029  
Lonnie and Cynthia Drollinger Contract Collection (Ch 7)

Invoice: 2206877  
April 6, 2023

**Invoice Summary**

Professional Fees Through March 31, 2023	\$125.00
Disbursements	\$0.00
<b>Amount Due – Current Period:</b>	<b><u>\$125.00</u></b>

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

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

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

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

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

PO Box 3585  
Portland, OR 97208-3585

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

April 6, 2023

**Invoice Detail**

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
03/08/23	J. Knapp	0.2	Emails with Martha Cohn re update on bankruptcy and loan payoff status

**Fee Summary**

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
J. Knapp	Partner	0.2	\$625	\$125.00
<b>Summary Total:</b>		<b>0.2</b>		<b>\$125.00</b>

**Invoice Summary**

Professional Fees Through March 31, 2023	\$125.00
Disbursements	<u>\$0.00</u>
<b>Amount Due - Current Period:</b>	<b><u>\$125.00</u></b>

# EXHIBIT C

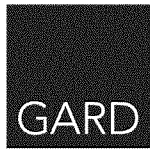
Michael G. Ueltzen, CPA  
606 East Ranch Road  
Sacramento, CA 95825  
916-333-2793  
85-3260070

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

Re: American Eagle Mortgage - Receivers' Accountant  
Professional Services for March 2023

Date	Description	Person	Hours	Rate	Amount
3/2/2023	Reports drafts	MU	1.4	450.00	\$ 630.00
3/4/2023	ID issues and report outline	MU	3.4	450.00	1,530.00
3/6/2023	Report outline and call with HS	MU	2.6	450	1,170.00
3/8/2023	Rebuttal report - Porter	MU	3.9	450.00	1,755.00
3/9/2023	Rebuttal report - Porter	MU	3.8	450.00	1,710.00
3/10/2023	Call with team and report	MU	1.6	450.00	720.00
3/11/2023	Rebuttal report - Porter	MU	2.8	450.00	1,260.00
3/12/2023	Rebuttal report - Porter	MU	6.6	450.00	2,970.00
3/13/2022	Rebuttal report - Porter and call	MU	4.8	450.00	2,160.00
3/14/2023	Rebuttal report	MU	4.7	450.00	2,115.00
3/15/2023	Report drafting and call	MU	3.4	450.00	1,530.00
3/16/2023	Call with team and report	MU	1.6	450.00	720.00
3/18/2023	Rebuttal report - Morones	MU	4.6	450.00	2,070.00
3/19/2023	Rebuttal report - Morones	MU	4.2	450.00	1,890.00
3/21/2023	Call with HS and MC; report	MU	1.9	450.00	855.00
3/22/2023	Review edits and report	MU	0.8	450.00	360.00
3/23/2023	Rebuttal reports	MU	1.3	450.00	585.00
3/26/2023	Reviews and edits	MU	3.5	450.00	1,575.00
3/27/2023	Morones report and calls	MU	2.8	450.00	1,260.00
3/28/2023	Review new materials and edits; call	MU	6.9	450.00	3,105.00
3/29/2023	Report review and related issues	MU	3.7	450.00	1,665.00
3/30/2023	Report review and related issues	MU	3.9	450.00	1,755.00
3/31/2023	Damage discussion and finalize reports	MU	2.8	450.00	1,260.00
	Total				<u>\$ 34,650.00</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

<b>Number</b>	15112
<b>Date</b>	03/31/23
<b>Job Number</b>	AEM-003
<b>PO#</b>	--
<b>Charge#</b>	--

**Job Name:** Microsite Updates & Maintenance

**Agency Contact:** Mary Wasson

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

Description	Hours Billed	Amount
Account Services	1.70	\$262.50
<b>Professional Services Subtotal:</b>	<b>1.70</b>	<b>\$262.50</b>
 <b>TOTAL:</b>	 <b>1.70</b>	 <b>\$262.50</b>

**PAYMENT TERMS:** net 30 days



# Invoice Detail Report

Invoice : 15112 Client : Hamstreet & Associates - AEM (AEM)

Page 1

04/10/23 9:42 AM  
(TY)

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

## AEM-003      Microsite Updates & Maintenance

Account Services:				Rate	Hrs	Amount
405267	03/02/23	NK <i>Account transfer convo</i>	Naureen Khan	\$175.00	0.25	\$43.75
405269	03/02/23	NK <i>Review billings</i>	Naureen Khan	\$175.00	0.25	\$43.75
405966	03/09/23	MW <i>AEM document upload training</i>	Mary Wasson	\$125.00	0.20	\$25.00
406629	03/09/23	NK <i>Document upload</i>	Naureen Khan	\$175.00	0.30	\$52.50
406642	03/10/23	NK <i>Doc upload</i>	Naureen Khan	\$175.00	0.20	\$35.00
406888	03/16/23	MW <i>New event &amp; Blog post upload</i>	Mary Wasson	\$125.00	0.50	\$62.50
					<b>1.70</b>	<b>\$262.50</b>
<b>AEM-003 TOTAL</b>					<b>1.70</b>	<b>\$262.50</b>
<b>INVOICE #15112 TOTAL:</b>					<b>1.70</b>	<b>\$262.50</b>



# EXHIBIT E



Real Estate • Hospitality • Cross-Border Transactions  
 T +52 (624) 846 9205 | Toll Free USA 1 (877) 773 3172  
 Cr. Torrey: Km. 30 Plaza Los Portales, Lote 205  
 CP 23406, San Jose del Cabo, B.C.S., México

# INVOICE

Invoice # 22628  
 Date: 03/31/2023  
 Due On: 04/15/2023

Clyde A. Hamstreet & Associates, LLC, as AEM Receiver  
 One SW Columbia Street, Suite 1575  
 Portland, OR 97258  
 United States

## General Advisory - Mar de Plata

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	IM	03/01/2023	Review: Review of Lot 16 & 11 MDP Agreements; Meeting wNataly	0.70	\$130.00	\$91.00
Service	IM	03/02/2023	Meeting: Environmental meeting wEvelyn; review of EIS docs and new requirements; follow up on MDP contracts lot 16&11; Internal wNataly re. same	0.60	\$130.00	\$78.00
Service	IM	03/03/2023	Communications: communications wHannah and Nataly re. Spanish version for Jim Hart	0.10	\$130.00	\$13.00
Service	IM	03/08/2023	Meeting: wNataly re. MDP agreements; analyze closing process and review of sales spreadsheet	0.60	\$130.00	\$78.00
Service	IM	03/08/2023	communications wPublic Notary re. recording process MDP trust; internal re. same	0.45	\$130.00	\$58.50
Service	IM	03/09/2023	internal communications on promissory notes and installments; review of Excel Spreadsheet; internal discussions wNataly re. same	0.65	\$130.00	\$84.50
Service	BR	03/10/2023	Meeting: Tax advisors re: proposed amendment to Mar de Plata trust.	0.70	\$350.00	\$245.00
Service	IM	03/13/2023	internal re. MDP agreements and promissory notes; communications wHannah and Nataly re. same	0.25	\$130.00	\$32.50
Service	IM	03/14/2023	Meeting wNataly re. update sales excel spreadsheet; follow up on Spa version comments; review of installments amounts; discuss wNat on closing process and follow	0.50	\$130.00	\$65.00

ups; follow up on Mar de Plata trust recordation process

Service	IM	03/22/2023	follow up on Mara's agreement, Moretti, and new prospective Buyer; internal wNataly on next steps and follow ups	0.40	\$130.00	\$52.00
Service	IM	03/23/2023	internal wTeam re. MDP agreements; discuss Lot 19 and 16; communications re. EIS MDP Project	0.50	\$130.00	\$65.00
Service	IM	03/24/2023	follow up on MDL contracts wNataly	0.15	\$130.00	\$19.50
Service	IM	03/29/2023	email wClient re. brokers commissions; internal on MDP contracts and questions	0.40	\$130.00	\$52.00
Service	IM	03/30/2023	Discussions: internal re. MDP contracts and questions	0.40	\$130.00	\$52.00
<b>Subtotal</b>						<b>\$986.00</b>

## General Advisory

Type	Attorney	Date	Notes	Quantity	Rate	Total
Service	OV	03/28/2023	Communications with the Notary Public to send them the POA of AEM 200 to start with the preparation of the documents for the mortgage release of Anthony Tremayne. And communications with Tremayne in order to inform the status and coordinate possible signing dates.	2.25	\$130.00	\$292.50
Service	BR	03/31/2023	Local Management & Banking Support March, 2023	1.00	\$200.00	\$200.00
<b>Subtotal</b>						<b>\$492.50</b>
<b>Total</b>						<b>\$1,478.50</b>

## Detailed Statement of Account

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
22628	04/15/2023	\$1,478.50	\$0.00	\$1,478.50

<b>Outstanding Balance</b>	<b>\$1,478.50</b>
<b>Total Amount Outstanding</b>	<b>\$1,478.50</b>

Please make all amounts payable to: Rosen Law

Please pay within 15 days.

# EXHIBIT F

KRESTON BSG

KBS110829KX4

Domicilio Fiscal:

OSA MAYOR 2523 11 CORREDEOR COMERCIAL
DESARROLLO ATLIXCAYOTL, Puebla, Puebla,
MEXICO, C.P: 72193.

Expedido en: 72193

601 - General de Ley Personas
Morales



COMPROBANTE FISCAL DIGITAL INTERNET

I - Ingreso

Folio Fiscal: 09F8A51B-90B1-406D-84DE-8C00CDD81D26
No. de Serie Cert. del SAT: 00001000000505142236
Fecha y hora de Certificación: 2023-04-10 18:39:19

DATOS DE ELABORACIÓN

2023-04-10 18:39:18

Serie y Folio Interno: K1300020911
Serie Certificado del Emisor: 00001000000509469578
Método de Pago: PPD - Pago en parcialidades o diferido
Moneda: Dolar de EE. UU.

DATOS DEL CLIENTE

Nombre: Clyde Hamstreet & Associates LLC
RFC: XEXX010101000
Calle: 1 SW Suite 1575
Colonia: Columbia
Municipio: Oregon
Código Postal: 72193
Uso CFDI:
Estado: Portland
País: Estados Unidos

Table with 5 columns: CANTIDAD, DESCRIPCIÓN, UNIDAD DE MEDIDA, PRECIO UNITARIO, IMPORTE

Auditoría de Estados Financieros Parcialidad 1/4

Forma de Pago: 99 - Por definir - Tipo de Cambio: 18.1185

Importe Con Letra: TRES MIL SETENTA Y CINCO DÓLARES 00/100 USD

Summary table with 2 columns: Description, Amount

SELLO SAT

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CADENA ORIGINAL DEL COMPLEMENTO DE CERTIFICACIÓN DEL SAT

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