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Scott G. Weber, Clerk
Clark County

46 Pages

SUPERIOR COURT OF WASHINGTON FOR CLARK COUNTY

In re:

Case No. 19-2-01458-06

**RECEIVER'S NOTICE OF INTENT TO
 COMPENSATE (MARCH AND APRIL 2023)**

AMERICAN EAGLE MORTGAGE 100, LLC; AMERICAN EAGLE MORTGAGE 200, LLC; AMERICAN EAGLE MORTGAGE 300, LLC; AMERICAN EAGLE MORTGAGE 400, LLC; AMERICAN EAGLE MORTGAGE 500, LLC; AMERICAN EAGLE MORTGAGE 600, LLC; AMERICAN EAGLE MORTGAGE MEXICO 100, LLC; AMERICAN EAGLE MORTGAGE MEXICO 200, LLC; AMERICAN EAGLE MORTGAGE MEXICO 300, LLC; AMERICAN EAGLE MORTGAGE MEXICO 400, LLC; AMERICAN EAGLE MORTGAGE MEXICO 500, LLC; AMERICAN EAGLE MORTGAGE MEXICO 600, LLC; AMERICAN EAGLE MORTGAGE I, LLC; AMERICAN EAGLE MORTGAGE II, LLC; and AMERICAN EAGLE MORTGAGE SHORT TERM, LLC.

TO: AMERICAN EAGLE MORTGAGE 100 LLC; AMERICAN EAGLE MORTGAGE 200, LLC; AMERICAN EAGLE MORTGAGE 300, LLC; AMERICAN EAGLE MORTGAGE 400, LLC; AMERICAN EAGLE MORTGAGE 500, LLC; AMERICAN EAGLE MORTGAGE 600, LLC; AMERICAN EAGLE MORTGAGE MEXICO 100, LLC; AMERICAN EAGLE MORTGAGE MEXICO 200, LLC; AMERICAN EAGLE MORTGAGE MEXICO 300, LLC; AMERICAN EAGLE MORTGAGE MEXICO 400, LLC; AMERICAN EAGLE MORTGAGE MEXICO 500, LLC; AMERICAN EAGLE MORTGAGE MEXICO 600, LLC; AMERICAN EAGLE MORTGAGE I, LLC; AMERICAN EAGLE MORTGAGE II, LLC; and AMERICAN EAGLE MORTGAGE SHORT TERM, LLC;

AND TO: Parties requesting special notice.

RECEIVER'S NOTICE OF INTENT TO COMPENSATE
 (MARCH AND APRIL 2023) - 1

MILLER NASH LLP
 ATTORNEYS AT LAW
 T: 206.624.8300 | F: 206.340.0599
 605 5TH AVE S, SUITE 900
 SEATTLE, WASHINGTON 98104

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 and April 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 April 2023. For this period, the Receiver requests
14 final approval of its compensation in the amount of \$75,337.00 and reimbursement of no costs,
15 for a total payment of \$75,337.00.

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 April 2023.
18 For this period, such attorneys request final approval of their compensation in the amount of
19 \$151,763.00 and reimbursement of costs of \$4,050.05, for a total payment of \$155,813.05.

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 April 2023. For this period, such forensic accountant requests final approval of his
23 compensation in the amount of \$20,790.00 and reimbursement of no costs, for a total payment of
24 \$20,790.00.

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 April 2023. For this period, such consultants request final approval of their
2 compensation in the amount of \$105.00 and reimbursement of no costs, for a total payment of
3 \$105.00.

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 and April 2023. For this period, such attorneys request final approval of their
7 compensation in the amount of \$4,512.50 and reimbursement of no costs, for a total payment of
8 \$4,512.50.

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

13 Unless objections to the foregoing requests are filed with the Court and served on the
14 undersigned attorneys so as to be received by May 25, 2023, the Receiver may make the
15 payments requested herein and/or the professionals may apply their retainers, if any.

16 DATED this 12th day of May, 2023.

17 MILLER NASH LLP

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

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

21 Attorneys for Receiver

22 Clyde A. Hamstreet & Associates, LLC
23
24
25
26

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

May 9, 2023

Invoice # 2609

Professional Services

			<u>Hours</u>	<u>Amount</u>
4/3/2023	CAH	Litigation Support Participate in call with Mike Ueltzen, Hannah Schmidt and Martha Cohn. Respond to request for mediation and mediator.	1.80	1,125.00
	HS	Litigation Support Call with Class Action team.	0.30	150.00
	HS	Litigation Support Call with Mike Ueltzen, Clyde Hamstreet and Martha Cohn.	0.90	450.00
	HS	Litigation Support Calls with Edward Decker.	0.20	100.00
	HS	Receivership Duties Calls and emails regarding Mar de Plata.	0.50	250.00
	MC	Receivership Duties Return voicemails to investors and borrowers. Prepare documents to send to investor. Prepare loan modification for borrower and talk with Evergreen. Evergreen recon and payment histories. Renew Quickbooks.	5.80	928.00
	MC	Litigation Support Damages discussion with Michael Ueltzen, Clyde Hamstreet, and Hannah Schmidt.	0.90	144.00
4/4/2023	CAH	Litigation Support Talk with Hannah Schmidt and Martha Cohn regarding damages.	0.40	250.00
	HS	Receivership Duties Emails regarding Mar de Plata and Bonge stream.	0.30	150.00
	HS	Receivership Duties Call with Evelyn Torres and Veronica Hamstreet regarding Mar de Plata.	0.40	200.00
	MC	Receivership Duties Adjust and renew Quickbooks.	1.20	192.00

			<u>Hours</u>	<u>Amount</u>
4/4/2023	MC	Litigation Support Review next steps on transactional analysis with Hannah Schmidt and begin work. Read Morones rebuttal report. Discuss with Clyde Hamstreet.	3.70	592.00
	HS	Litigation Support Work with Clyde Hamstreet and Martha Cohn regarding damages. Work with Martha Cohn on detail.	1.00	500.00
4/5/2023	CAH	Litigation Support Work on mediation process with Tom Sand and Hannah Schmidt. Discuss providing expert opinions to SEC with Hannah Schmidt.	0.60	375.00
	HS	Receivership Duties Emails regarding Mar de Plata,	0.40	200.00
	MC	Receivership Duties Phone calls from investors.	0.80	128.00
	MC	Litigation Support Transaction analysis.	3.80	608.00
	HS	Litigation Support Discussion with Clyde Hamstreet regarding litigation.	0.60	300.00
4/6/2023	HS	Receivership Duties Emails regarding Mar de Plata.	0.30	150.00
4/7/2023	CAH	Litigation Support Participate in call with Mike Ueltzen, Edward Decker, Martha Cohn and Hannah Schmidt regarding litigation/mediation preparation.	1.10	687.50
	HS	Litigation Support Calls with Mike Ueltzen, Clyde Hamstreet, Edward Decker and Martha Cohn. Follow up work regarding same.	1.90	950.00
	HS	Receivership Duties Read and respond to emails.	0.50	250.00
	MC	Litigation Support Damages call with Hannah Schmidt, Michael Ueltzen, and Edward Decker. Follow up discussion with Hannah Schmidt. Pull information requested.	1.90	304.00
4/9/2023	CAH	Litigation Support Review expert reports and draft comments and thoughts in preparation for mediation.	2.10	1,312.50
4/10/2023	CAH	Litigation Support Work with Hannah Schmidt on cash resources and needs. Review budget to actual and Mexico resources. Correspondence with lawyer's regarding litigation developments. Review rebuttals to Stoley's report.	3.70	2,312.50
	HS	Litigation Support Call with Mike Ueltzen and Martha Cohn and follow up work regarding same.	2.50	1,250.00

			<u>Hours</u>	<u>Amount</u>
4/10/2023	HS	Receivership Duties Work with Clyde Hamstreet on cash flow projections.	0.50	250.00
	HS	Pacific Premier Bank Review Morones rebuttal report.	0.50	250.00
	HS	Receivership Duties Read and respond to Mar del Plata emails.	0.30	150.00
	MC	Receivership Duties Process checks and deposits.	0.80	128.00
	MC	Litigation Support Pull interest income and expense 2007 and 2008. Read Michael Ueltzen's memo. Work on transactional analysis spreadsheet. Call on damages with Hannah Schmidt and Michael Ueltzen.	2.50	400.00
4/11/2023	CAH	Litigation Support Meet with Dave Foraker regarding management of case and fees. Read Bank's expert witness rebuttal reports regarding Stoley's report. Work with Hannah Schmidt on cash flow projections for next six months.	3.40	2,125.00
	HS	Receivership Duties Work with Clyde Hamstreet on cash flow projections.	0.80	400.00
	HS	Receivership Duties Read and respond to Mar del Plata emails.	0.50	250.00
	HS	Pacific Premier Bank Review Morones rebuttal report.	0.50	250.00
	HS	Pacific Premier Bank Review and analyze Morones information.	3.20	1,600.00
	MC	Litigation Support Review transactional analysis.	4.20	672.00
4/12/2023	CAH	Litigation Support Review banking expert rebuttals, work on damages reports, and focus on general aspects of mediation process regarding the case.	4.20	2,625.00
	HS	Litigation Support Call with Edward Decker regarding damages and follow up work regarding same.	3.50	1,750.00
	HS	Pacific Premier Bank Review damages in preparation for mediation. Emails regarding same.	0.80	400.00
	MC	Litigation Support Track down investor contact information. Transactional analysis for Riverview.	4.40	704.00

		<u>Hours</u>	<u>Amount</u>
4/13/2023	CAH	Litigation Support Continue reviewing rebuttal reports. Participate in damage presentation call with Mike Ueltzen, Hannah Schmidt and Martha Cohn. Work on agenda for 04/14 meeting with counsel.	3.20 2,000.00
	HS	Litigation Support Work with Clyde Hamstreet and Martha Cohn to prepare for mediation. Create charts regarding same.	3.00 1,500.00
	HS	Receivership Duties Emails regarding Mar de Plata.	0.30 150.00
	HS	Litigation Support Call with Clyde Hamstreet, Mike Ueltzen and Martha Cohn.	0.90 450.00
	MC	Receivership Duties Administrative tasks; call Evergreen, go through checks, review invoices.	0.50 80.00
	MC	Litigation Support Review transactional analysis. Start mock up of timeline charts.	2.30 368.00
	MC	Litigation Support Call and discussion on damages calculation with Clyde Hamstreet, Hannah Schmidt, and Michael Ueltzen.	2.10 336.00
4/14/2023	CAH	Litigation Support Prepare for and participate in meeting with Miller Nash lawyers regarding litigation and mediation choices. Follow up discussions with Hannah Schmidt and Martha Cohn.	3.00 1,875.00
	HS	Litigation Support Meet with Clyde Hamstreet, Martha Cohn, David Foraker, Joe Vance, Tom Sand and Edward Decker regarding mediation. Follow up discussion with Clyde Hamstreet and Martha regarding same.	3.00 1,500.00
	MC	Litigation Support Draft charts.	1.70 272.00
	MC	Litigation Support Meeting with Miller Nash team. Follow up discussions with Clyde Hamstreet and Hannah Schmidt.	3.00 480.00
4/17/2023	HS	Receivership Duties Emails regarding Mar de Plata	0.50 250.00
	MC	Receivership Duties Review invoices and process checks.	0.50 80.00
4/18/2023	HS	Receivership Duties Prepare for and call with Ben Rosen and Clyde Hamstreet regarding Mexico progress.	1.50 750.00

			<u>Hours</u>	<u>Amount</u>
4/18/2023	CAH	Receivership Duties Call with Ben Rosen and Hannah Schmidt regarding Mexico progress.	1.50	937.50
4/19/2023	HS	Riverview Bank Research questions from Joe Vance and Edward Decker.	1.00	500.00
	HS	Receivership Duties Call with Martha Cohn regarding quarterly reporting.	0.30	150.00
	MC	Receivership Duties Quarterly reporting.	1.50	240.00
	MC	Investor Relations Call investor, prepare requested information, return investor emails, call borrower.	1.00	160.00
4/20/2023	CAH	Litigation Support Review and edit letter to Judge Hogan. Work on explanatory charts for mediation.	4.80	3,000.00
	HS	Litigation Support Review and comment on letter to Hogan. Research regarding Riverview bank.	4.40	2,200.00
	MC	Litigation Support Review mediation letter. Draft charts of investor MIMOs.	3.50	560.00
	MC	Investor Relations Call from investor.	0.40	64.00
4/21/2023	HS	Receivership Duties Work on quarterly reporting.	1.00	500.00
	HS	Litigation Support Review and comment on mediation statement. Respond to questions from Edward Decker.	1.50	750.00
	MC	Litigation Support Draft charts of investor MIMOs. Final review of mediation letter.	3.00	480.00
4/22/2023	CAH	Litigation Support Continue to review documents in preparation for mediation.	2.30	1,437.50
4/24/2023	CAH	Litigation Support Work on explanatory charts for mediation.	1.30	812.50
	CAH	Litigation Support Work on mediation preparation with Hannah Schmidt and Martha Cohn. Respond to Joe Vance regarding mediation.	2.80	1,750.00
	HS	Litigation Support Discussions with Clyde Hamstreet and Edward Decker regarding mediation statement.	0.40	200.00

			<u>Hours</u>	<u>Amount</u>
4/24/2023	HS	Receivership Duties Work on quarterly reporting.	1.00	500.00
	MC	Mediation Transfer charts to Visio; draft timeline and other charts.	2.30	368.00
4/25/2023	CAH	Litigation Support Work on preparations of materials for mediation with Hannah Schmidt and Martha Cohn. Review possible slides and charts for usefulness. Discuss counter offer on Montana property.	2.90	1,812.50
	HS	Litigation Support Work with Clyde Hamstreet and Martha Cohn to prepare for mediation.	5.00	2,500.00
	HS	Receivership Duties Read and respond to emails.	0.50	250.00
	MC	Mediation Draft and edit timelines and charts for mediation.	4.80	768.00
	MC	Receivership Duties Make chart for investor, respond to servicing company, process checks.	1.20	192.00
4/26/2023	CAH	Litigation Support Prepare for and participate in zoom conference with Miller Nash regarding preparations for mediation. Work on presentation materials.	3.90	2,437.50
	HS	Litigation Support Prepare for mediation.	1.00	500.00
	MC	Mediation Calls regarding mediation with Edward Decker, Hannah, Schmidt, and Michael Ueltzen.	2.20	352.00
	MC	Mediation Draft and edit timelines and charts for mediation.	2.60	416.00
4/27/2023	CAH	Pacific Premier Bank Attend mediation session with Pacific Premier Bank.	10.00	6,250.00
	HS	Pacific Premier Bank Call with Clyde Hamstreet, Joe Vance, Tom Sand, Edward Decker and Martha Cohn to prepare for mediation.	0.90	450.00
	HS	Litigation Support Call with Mike Ueltzen regarding insolvency charts.	0.50	250.00
	HS	Pacific Premier Bank Participate in mediation.	10.00	5,000.00
	MC	Pacific Premier Bank Attend mediation at Holland & Knight.	10.00	1,600.00

		<u>Hours</u>	<u>Amount</u>
4/28/2023	HS Pacific Premier Bank Participate in mediation.	3.10	1,550.00
	MC Pacific Premier Bank Attend mediation call.	3.10	496.00
For professional services rendered		188.90	\$75,337.00
Accounts receivable transactions			
5/2/2023	Payment invoice #2599 - Thank You		(\$76,694.50)
Total payments and adjustments			(\$76,694.50)
Balance due			<u><u>\$75,337.00</u></u>

Consultant Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Clyde A. Hamstreet - Principal	53.00	625.00	\$33,125.00
Hannah Schmidt - Consultant	60.20	500.00	\$30,100.00
Martha Cohn - Jr. Consultant	75.70	160.00	\$12,112.00

EXHIBIT B

Description	Bill Amt	Fees	Costs	Bill Num
American Eagle Mortgage Investment Funds	\$7,045.35	\$6,703.50	\$341.85	2209037
Adjunct Litigation Claims Against Ross Miles, Maureen Wile, et al.	\$148,767.70	\$145,059.50	\$3,708.20	2209041
	\$155,813.05	\$151,763.00	\$4,050.05	

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: 2209037
May 4, 2023

Invoice Summary

Professional Fees Through April 30, 2023	\$6,703.50
Disbursements	<u>\$341.85</u>
Amount Due – Current Period:	<u>\$7,045.35</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.

May 4, 2023

Invoice Detail

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/03/23	J. Knapp	0.6	Emails with Michael Ueltzen re notice of intent to compensate (March 2023) (.2); draft notice of intent to compensate (March 2023) (.4)
04/05/23	J. Knapp	1.1	Prepare for and attend telephone conference with Rob Durham, Crystal Boodoo, Kashya Shei, and Hannah Schmidt re SEC matters and related emails (.7); email communications with Rosen Law re notice of intent to compensate (March 2023) (.2); continue drafting notice of intent to compensate (March 2023) (.2)
04/06/23	D. Foraker	0.1	Email with Hannah Schmidt re receiver's fifteenth quarterly report
04/06/23	J. Knapp	0.9	Continue drafting notice of intent to compensate (March 2023) (.2); draft notice of filing of quarterly report (.4); email communications with Hannah Schmidt and Kashya Shei re SEC questions about Maureen Wile (.3)
04/07/23	J. Knapp	0.6	Emails with Hannah Schmidt re planning for call with Kashya Shei (.2); emails with Veronica Hamstreet re notice of intent to compensate (March 2023) (.2); continue drafting notice of intent to compensate (March 2023) (.2)
04/10/23	J. Knapp	0.5	Email communications with Lucero Ramirez re notice of intent to compensate (March 2023) (.2); continue drafting notice of intent to compensate (March 2023) (.2); email communications with Hannah Schmidt re notice of intent to compensate (March 2023) (.1)
04/11/23	J. Knapp	0.6	Email communications with Lucero Ramirez re notice of intent to compensate (March 2023) (.1); email communications with Hannah Schmidt re same (.1); email communications with Teri Yamauchi re notice of intent to compensate (March 2023) (.2); continue drafting notice of intent to compensate (March 2023) (.2)
04/12/23	J. Knapp	0.4	Continue drafting notice of intent to compensate (March 2023)

May 4, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/13/23	J. Knapp	0.6	Finalize notice of intent to compensate (March 2023) (.4); emails with Mary Wasson re transmittal of court filings for posting to website (.2)
04/17/23	B. Dickey	0.3	Prepare and file Washington annual renewal of American Eagle Mortgage Mexico 400, LLC
04/18/23	J. Knapp	0.2	Email communications with Lucero Ramirez re notice of intent to compensate (March 2023)
04/21/23	J. Knapp	0.2	Review notice of intent to compensate (March 2023)
04/24/23	D. Foraker	0.6	Review drafts of receiver's fifteenth quarterly report and related emails with Hannah Schmidt and John Knapp
04/24/23	J. Knapp	1.9	Review and edit drafts of receiver's fifteenth quarterly report and related emails with Hannah Schmidt and David Foraker (1.6); email communications with John Rake re status of District Court approval of class action settlement (.3)
04/25/23	J. Knapp	0.7	Review and comment on revised draft of fifteenth quarterly report (.3); continue drafting notice of filing of quarterly report (.2); emails with Hannah Schmidt re quarterly report (.2)
04/26/23	J. Knapp	0.3	Continue to prepare notice of filing of quarterly report
04/27/23	J. Knapp	0.7	Finalize notice of filing of quarterly report (.2); emails with Mary Wasson re transmittal of notice for uploading to website (.2); emails with Hannah Schmidt re notice of intent to compensate (March 2023) (.2); email with Lucero Ramirez re notice of intent to compensate (March 2023) (.1)
04/28/23	J. Knapp	0.5	Emails with Hannah Schmidt re notice of intent to compensate (March 2023) (.1); emails with Lucero Ramirez re notice of intent to compensate (March 2023) (.1); review court notices re rejected filing of quarterly report (.1); emails with Heather Harmon re correction of filing (.2)

May 4, 2023

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
D. Foraker	Partner	0.7	\$685	\$479.50
J. Knapp	Partner	9.8	625	6,125.00
B. Dickey	Paralegal	0.3	330	99.00
Summary Total:		10.8		\$6,703.50

Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Extraordinary postage	\$9.35
Washington Secretary of State: Annual filing fee of American Eagle Mortgage Mexico 400, LLC	60.00
Bonner County Clerk: Pleadings request	33.00
Clark County Clerks Office: Ex parte presentation fee	30.00
Simplifile (ACH); Invoice#: 05012023; Recording fees for fulfillment deed	209.50
Disbursement Total:	\$341.85

Invoice Summary

Professional Fees Through April 30, 2023	\$6,703.50
Disbursements	<u>\$341.85</u>
Amount Due - Current Period:	<u>\$7,045.35</u>

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: 2209041
May 4, 2023

Invoice Summary

Professional Fees Through April 30, 2023	\$145,059.50
Disbursements	<u>\$3,708.20</u>
Amount Due – Current Period:	<u>\$148,767.70</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.

May 4, 2023

Invoice Detail

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/03/23	E. Decker	1.6	Correspond with experts re rebuttal reports (.5); virtual meeting with Chris Kayser, Jon Hunt, Hannah Schmidt, and David Foraker re recent developments in bank litigation (.3); telephone call with Lisa Peterson re privilege logs (.1); telephone call with Hannah Schmidt re rebuttal expert reports (.2); analyze rebuttal expert reports (.5)
04/03/23	D. Foraker	0.4	Series of emails re Pacific Premier Bank mediation scheduling matters (.1); virtual meeting with Chris Kayser, Jon Hunt, Hannah Schmidt, and Edward Decker re recent developments on bank litigation (.3)
04/03/23	L. Giles	0.5	Review rebuttal expert reports
04/03/23	L. Peterson	2.2	Review and analyze Relativity database re Hamstreet emails withheld as work product (2.1); telephone call with Edward Decker re privilege logs (.1)
04/03/23	T. Sand	1.9	Continue drafting jury instructions (.5); review expert reports (.6); email client and team re mediation (.3); plan logistics and schedule for mediation (.5)
04/03/23	B. Shattuck	2.5	Research Washington's pattern jury instructions (.6); compile list of topics for jury instructions (1.9)
04/04/23	E. Decker	1.5	Virtual meeting with David Foraker, Joseph Vance, and Tom Sand re Pacific Premier Bank mediation preparation and related matters (.5); telephone call with Hannah Schmidt re preparation for expert depositions (.3); virtual meeting with Ben Shattuck re ongoing research projects (.1); telephone call with expert re rebuttal reports (.2); correspond with bank defendants' counsel re order on motions for summary judgment (.4)
04/04/23	D. Foraker	0.5	Virtual meeting with Tom Sand, Joseph Vance, and Edward Decker re Pacific Premier Bank mediation and related matters

May 4, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/04/23	T. Sand	2.3	Virtual meeting with David Foraker, Joseph Vance, and Edward Decker re Pacific Premier Bank mediation preparation and related matters (.5); review expert reports and strategy re depositions and trial (1.5); email Eric English and Josh Hogan re Pacific Premier Bank mediation (.3)
04/04/23	B. Shattuck	1.6	Virtual meeting with Edward Decker re ongoing research projects (.1); research case law re theories of damages (1.5)
04/04/23	J. Vance	0.5	Virtual meeting with David Foraker, Edward Decker, and Tom Sand re Pacific Premier Bank mediation preparation and related matters
04/05/23	E. Decker	0.3	Telephone call with Lisa Peterson re work product documents
04/05/23	L. Peterson	3.8	Continue to analyze searches in Relativity related to privilege and create search to capture documents in the work product category on categorical privilege log (2.4); email to Edward Decker with spreadsheet of work product documents and summary of process used to create search (.5); telephone call from Edward Decker re work product documents (.3); email to Streamline Imaging to request search term hit report on work product documents (.6)
04/05/23	T. Sand	0.4	Email client and counsel re schedule and logistics for Pacific Premier Bank mediation
04/05/23	B. Shattuck	3.7	Research case law re damages and draft file memorandum re same
04/06/23	E. Decker	1.4	Review research on alternate damages theories (.2); telephone call with Lisa Peterson (.4); analyze issues related to privilege review and privilege log (.6); correspond with counsel for Pacific Premier Bank re privilege review (.2)
04/06/23	L. Peterson	0.6	Review email from Jason Walton of Streamline with requested reports related to work product privileged emails (.2); telephone call with Edward Decker re reports (.4)

May 4, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/06/23	T. Sand	1.3	Organize case materials for trial preparation (.8); email Joseph Vance and Eric English re Pacific Premier Bank mediation (.2); review assessment of alternative damage theories (.2); email Eric English re mediation (.1)
04/06/23	B. Shattuck	1.8	Continue legal research re damages
04/07/23	E. Decker	1.9	Analyze bank defendants' rebuttal reports (1.0); telephone call with Lisa Peterson (.1); virtual meeting with Hannah Schmidt and Mike Ueltzen re damages analysis (.7); correspond with opposing counsel re expert discovery (.1)
04/07/23	L. Giles	2.1	Review rebuttal expert reports
04/07/23	L. Peterson	0.3	Telephone call from Edward Decker re documents for expert (.1); review email from Gary Stoley and prepare ShareFile of additional Pacific Premier Bank documents (.2)
04/07/23	B. Shattuck	1.6	Continue legal research re damages and draft file memorandum re same
04/10/23	E. Decker	1.4	Telephone conference with Joseph Vance re mediation strategy, expert discovery, and privilege log (.6); virtual meeting with Tom Sand and Joseph Vance re mediation strategy (.3); virtual meeting with Lisa Peterson re privilege review and log (.3); telephone call with counsel for Pacific Premier Bank re privilege log (.1); analyze additional information re bank defendants' expert witnesses (.1)
04/10/23	D. Foraker	0.2	Virtual meeting with Joseph Vance re bank settlement strategy
04/10/23	H. Harmon	0.1	Prepare deposition of Sherry Beattie for attorney review
04/10/23	L. Peterson	0.6	Virtual meeting with Edward Decker re privilege review and log (.3); emails and calls with Ara Roselani re additional reports needed concerning work product privileged documents (.3)

May 4, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/10/23	T. Sand	0.5	Review settlement proposal from Riverview Bank (.2); virtual meeting with Joseph Vance and Edward Decker re mediation strategy (.3)
04/10/23	J. Vance	3.3	Telephone conference with Edward Decker re mediation strategy, expert discovery, and privilege log (.6); virtual meeting with David Foraker re bank settlement strategy (.2); virtual meeting with Tom Sand and Edward Decker re mediation strategy (.3); exchange communications with Chip Paternoster re Riverview Bank settlement offer (.4); exchange communications with Clyde Hamstreet and Hannah Schmidt re Riverview Bank settlement offer (.3); analyze expert rebuttal reports (1.5)
04/11/23	E. Decker	1.5	Telephone conference with Lisa Peterson re privilege review (.3); virtual meeting with Joseph Vance, Tom Sand, Lisa Peterson, Mark Tyler, Lorian Giles, and Ben Shattuck re trial preparation (.3); virtual meeting with Joseph Vance re mediation strategy and trial preparation (.5); analyze damage analyses prepared by expert (.4)
04/11/23	D. Foraker	0.3	Email with Clyde Hamstreet re bank mediations planning meeting and related emails with Hannah Schmidt
04/11/23	L. Giles	4.8	Review rebuttal reports and prepare summary for file (4.5); virtual meeting with Joseph Vance, Edward Decker, Tom Sand, Mark Tyler, Ben Shattuck, and Lisa Peterson re trial preparation (.3)
04/11/23	L. Peterson	1.6	Telephone conference with Edward Decker re privilege review (.3); virtual meeting with Joseph Vance, Tom Sand, Edward Decker, Mark Tyler, Lorian Giles, and Ben Shattuck re trial preparation (.3); telephone call with Ben Shattuck re privilege review (.1); review searches prepared by Streamline and request additional fields for privilege review (.3); review and analyze documents tagged as work product privileged (.6)

May 4, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/11/23	T. Sand	1.1	Review status of settlement negotiation and plan strategy for mediation (.3); review draft jury instructions (.3); virtual meeting with Joseph Vance, Edward Decker, Mark Tyler, Lorien Giles, Ben Shattuck, and Lisa Peterson, re trial preparation (.3); review draft agenda for pretrial conference (.2)
04/11/23	B. Shattuck	0.4	Virtual meeting with Joseph Vance, Tom Sand, Edward Decker, Mark Tyler, Lorien Giles, and Lisa Peterson re trial preparation (.3); telephone call with Lisa Peterson re privilege review (.1)
04/11/23	M. Tyler	0.3	Virtual meeting with Edward Decker, Joseph Vance, Tom Sand, Lorien Giles, Ben Shattuck, and Lisa Peterson re trial preparation
04/11/23	J. Vance	1.5	Virtual meeting with Edward Decker, Tom Sand, Lisa Peterson, Mark Tyler, Lorien Giles, and Ben Shattuck re trial preparation (.3); virtual meeting with Edward Decker re mediation strategy and trial preparation (.5); analyze email from Pacific Premier Bank attorney re pretrial deadlines (.3); outline issues for trial (.4)
04/12/23	E. Decker	1.4	Telephone conference with Lisa Peterson and Ben Shattuck re privilege review (.3); virtual meeting with Joseph Vance re damages analysis and privilege review (.3); telephone conference with Hannah Schmidt re damages analysis (.4); analyze potentially privileged documents (.1); prepare for client meeting (.3)
04/12/23	D. Foraker	0.6	Draft agenda for bank mediations planning meeting
04/12/23	L. Peterson	1.2	Continue to review and analyze documents tagged as work product privileged (.6); telephone conference with Edward Decker and Ben Shattuck re privilege review (.3); revise tag pallet in Relativity database (.1); emails with Sarah Houser re document batching (.2)
04/12/23	T. Sand	0.6	Plan strategy for bank mediations
04/12/23	B. Shattuck	2.9	Telephone conference with Edward Decker and Lisa Peterson re privilege review (.3); review documents on Relativity for privilege (2.6)

May 4, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/12/23	J. Vance	2.5	Virtual meeting with Edward Decker re damages analysis and privilege review (.3); analyze rebuttal expert reports (2.2)
04/13/23	E. Decker	3.3	Virtual meeting with David Foraker, Joseph Vance, and Tom Sand re preparation for 4/14 client meeting (.4); draft talking points for client meeting (1.5); analyze revised damages models (.9); virtual meeting with defendants' counsel re pretrial scheduling issues and logistics (.5)
04/13/23	D. Foraker	0.6	Virtual meeting with Tom Sand, Joseph Vance, and Edward Decker re preparation for 4/14 client meeting (.4); email to Clyde Hamstreet, Hannah Schmidt, and Martha Cohn re transmittal of agenda for 4/14 bank mediations planning meeting and related emails with revised agenda (.2)
04/13/23	L. Peterson	0.2	Communications with Ben Shattuck re bank emails in work product privilege review
04/13/23	T. Sand	0.9	Email Kristin Asai re trial planning (.1); review agenda and prepare for client meeting re bank mediations (.4); virtual meeting with David Foraker, Joseph Vance, and Edward Decker re preparation for 4/14 client meeting (.4)
04/13/23	B. Shattuck	3.7	Review documents on Relativity for privilege
04/13/23	J. Vance	3.5	Virtual meeting with David Foraker, Tom Sand, and Edward Decker re preparation for 4/14 client meeting (.4); prepare for and attend virtual meeting with defendants' counsel re pretrial scheduling issues and logistics (1.2); exchange emails with court clerk re trial logistics (.3); analyze issues for trial (1.6)
04/14/23	E. Decker	3.6	Prepare for (.8) and attend (2.5) bank mediations planning meeting at Hamstreet offices; virtual meeting with Joseph Vance re mediation statement (.1); respond to questions from privilege review team (.2)
04/14/23	D. Foraker	2.5	Attend bank mediations planning meeting at Hamstreet offices

May 4, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/14/23	L. Peterson	4.9	Review and analyze work product privileged emails (3.8); communications with Edward Decker and Ben Shattuck re privilege issues (1.0); communications with Ben Shattuck re categorical privilege log and players directory (.1)
04/14/23	T. Sand	3.3	Prepare for (.5) and attend (2.5) bank mediations planning meeting via video conference; email counsel re mediation and trial planning (.3)
04/14/23	B. Shattuck	5.7	Review documents on Relativity for privilege
04/14/23	J. Vance	6.0	Prepare for (.5) and attend (2.5) bank mediations planning meeting at Hamstreet offices; exchange communications with Chip Paternoster re possible mediation (.5); research possible mediators for Riverview Bank mediation (.5); virtual meeting with Edward Decker re mediation statement (.1); prepare mediation statement (1.9)
04/17/23	E. Decker	1.4	Virtual meeting with Joseph Vance re mediation statement (.2); virtual meeting with Lorien Giles re expert depositions and trial exhibits (.3); virtual meeting with Mark Tyler re expert depositions (.1); virtual meeting with Ben Shattuck re privilege review (.1); review and analyze draft mediation statement (.7)
04/17/23	D. Foraker	0.1	Email to Chris Kayser et al re cancellation of bi-monthly meeting
04/17/23	L. Giles	0.7	Draft exhibit list forms and correspond regarding related document collection (.4); virtual meeting with Edward Decker re expert depositions and trial exhibits (.3)
04/17/23	B. Shattuck	4.3	Review Hamstreet's communications for privilege (4.2); virtual meeting with Edward Decker re same (.1)
04/17/23	M. Tyler	0.1	Virtual meeting with Edward Decker re expert depositions
04/17/23	J. Vance	2.6	Exchange communications re Riverview Bank mediation (.4); virtual meeting with Edward Decker re mediation statement (.1); outline issues for trial (2.1)

May 4, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/18/23	E. Decker	3.0	Virtual meeting with Joseph Vance, Ben Shattuck, Lorien Giles, and Mark Tyler re privilege review, trial preparation, and preparation for mediation (.5); telephone call with Hannah Schmidt re damages illustrations for mediation brief (.2); prepare exhibit for mediation brief (.4); draft mediation brief for Pacific Premier Bank mediation (1.8); correspond with counsel for Riverview Bank re expert depositions (.1)
04/18/23	L. Giles	0.5	Virtual meeting with Joseph Vance, Edward Decker, Ben Shattuck, and Mark Tyler re privilege review, trial preparation, and preparation for mediation
04/18/23	T. Sand	0.5	Review Riverview Bank amended answer and settlement communications from Chip Paternoster
04/18/23	B. Shattuck	2.6	Review Hamstreet's communications for privilege (2.1); virtual meeting with Joseph Vance, Edward Decker, Lorien Giles, and Mark Tyler re privilege review, trial preparation, and preparation for mediation (.5)
04/18/23	M. Tyler	0.5	Virtual meeting with Joseph Vance, Ben Shattuck, Lorien Giles, and Edward Decker re privilege review, trial preparation, and preparation for mediation
04/18/23	J. Vance	2.5	Virtual meeting with Edward Decker, Ben Shattuck, Lorien Giles, and Mark Tyler (.5); exchange communications with defendants' counsel re scheduling issues (.3); investigate and interview potential witnesses (1.7)
04/19/23	E. Decker	1.2	Virtual meeting with Joseph Vance re mediation briefs (.2); draft Riverview Bank mediation brief (.9); analyze privilege questions from review team (.1)
04/19/23	H. Harmon	0.4	Prepare notices of depositions for experts Nancy Terrill and Serena Morones (.2); update case docketing (.1); coordinate court reporter and videographer services for in-person and remote depositions (.1)
04/19/23	T. Sand	1.0	Review draft mediation statement and plan strategy for Pacific Premier Bank mediation (.8); review schedule and plan for Riverview Bank mediation (.2)

May 4, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/19/23	B. Shattuck	4.0	Review internal Hamstreet communications for privilege
04/19/23	M. Tyler	5.8	Review expert report of Gary Stoley and defendants' corresponding rebuttal reports (4.3); virtual meeting with Joseph Vance and expert re expert rebuttal reports (1.5)
04/19/23	J. Vance	4.2	Prepare for (.7) and attend (1.5) virtual meeting with expert and Mark Tyler re rebuttal expert reports; revise Pacific Premier Bank mediation statement (.5); research and interview potential trial witnesses (1.5)
04/20/23	E. Decker	1.6	Second level review of potential work product documents
04/20/23	B. Shattuck	6.4	Review internal Hamstreet communications for privilege
04/20/23	J. Vance	3.0	Exchange communications with Chip Paternoster and clients re change in Riverview Bank mediation date (.5); analyze issues for trial (1.5); revise Pacific Premier Bank mediation statement (1.0)
04/21/23	E. Decker	5.4	Review selected documents for privilege and work product review (3.5); revise draft Pacific Premier Bank mediation letter (.5); draft mediation letter for Riverview Bank mediation (1.4)
04/21/23	D. Foraker	0.5	Review and edit draft mediation statement for Pacific Premier Bank mediation
04/21/23	B. Shattuck	3.1	Review internal Hamstreet communications for privilege
04/21/23	J. Vance	3.5	Interview and research potential witnesses (.7); revise and edit Pacific Premier Bank mediation statement (2.8)
04/24/23	E. Decker	4.9	Revise Pacific Premier Bank mediation letter brief (1.0); virtual meeting with Lisa Peterson and Ben Shattuck re privilege review (.2); virtual meeting with Joseph Vance re pretrial projects and mediation (.2); draft Riverview Bank mediation letter brief (3.5)
04/24/23	L. Giles	0.3	Conference with Lisa Peterson re preparation trial exhibits

May 4, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/24/23	H. Harmon	0.2	Assist with finalization and distribution of Pacific Premier Bank mediation statement to Ret. Judge Hogan (.1); update case docketing with agreed pretrial deadlines (.1)
04/24/23	L. Peterson	0.7	Virtual meeting with Edward Decker and Ben Shattuck re status of work product privilege email review (.2); conference with Lorien Giles re preparation of trial exhibits (.3); review Streamline's March invoice for accuracy and email to Joseph Vance for approval (.1); email to Zachary Larmer re updates to Relativity user access (.1)
04/24/23	T. Sand	0.4	Review final draft of Pacific Premier Bank mediation brief
04/24/23	B. Shattuck	4.6	Review internal Hamstreet communications for privilege (4.5); virtual meeting with Edward Decker and Lisa Peterson re privilege review (.1)
04/24/23	M. Tyler	3.6	Compile list of trial exhibits re Riverview Bank
04/24/23	J. Vance	1.7	Revise and edit Pacific Premier Bank mediation statement (.7); exchange communications re discovery (.3); virtual meeting with Edward Decker (.2); analyze issues for trial (.5)
04/25/23	E. Decker	1.6	Virtual meeting with Tom Sand, Lisa Peterson, Joseph Vance, Lorien Giles, Mark Tyler, and Ben Shattuck re privilege review, expert depositions, and pretrial tasks (.6); virtual meeting with Tom Sand and Joseph Vance re strategy for mediation (.6); revise draft preparation materials for Michael Ueltzen deposition (.4)
04/25/23	D. Foraker	0.1	Email to Clyde Hamstreet, Hannah Schmidt, and litigation team re Florida Ponzi case verdict in Pearson v. Deutsche Bank
04/25/23	L. Giles	3.2	Draft attorney memo for expert and review related deposition transcripts (1.8); pull documents for exhibit list (.8); virtual meeting with Tom Sand, Joseph Vance, Edward Decker, Mark Tyler, Ben Shattuck, and Lisa Peterson re privilege review, expert depositions, and pretrial tasks (.6)

May 4, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/25/23	L. Peterson	0.6	Virtual meeting with Tom Sand, Edward Decker, Joseph Vance, Lorien Giles, Mark Tyler, and Ben Shattuck re privilege review, expert depositions, and pretrial tasks
04/25/23	T. Sand	2.0	Review draft jury instructions (.5); review recent court decisions (.3); virtual meeting with Joseph Vance, Edward Decker, Lorien Giles, Mark Tyler, Ben Shattuck and Lisa Peterson re privilege review, expert depositions, and pretrial tasks (.6); virtual meeting with Joseph Vance and Edward Decker re strategy for mediation (.6)
04/25/23	B. Shattuck	6.2	Virtual meeting with Joseph Vance, Tom Sand, Edward Decker, Lorien Giles, Mark Tyler, and Lisa Peterson re privilege review, expert depositions, and pretrial tasks (.6); review internal Hamstreet communications for privilege (4.8); pull items from docket from other receivership cases (.2); review jury instructions from other receivership cases (.6)
04/25/23	M. Tyler	2.3	Virtual meeting with Edward Decker, Joseph Vance, Tom Sand, Lisa Peterson, Ben Shattuck, and Lorien Giles re privilege review, expert depositions, and pretrial tasks (.6); continue compiling list of trial exhibits re Riverview Bank (1.7)
04/25/23	J. Vance	1.2	Virtual meeting with Tom Sand, Edward Decker, Lisa Peterson, Lorien Giles, Mark Tyler, and Ben Shattuck re privilege review, expert depositions, and pretrial tasks (.6); virtual meeting with Tom Sand and Edward Decker re strategy for mediation (.6)
04/26/23	A. Baxter	1.1	Prepare graphic in preparation for mediation

May 4, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/26/23	E. Decker	5.3	Prepare for (.2) and attend (.8) virtual meeting with Clyde Hamstreet, Hannah Schmidt, David Foraker, Tom Sand, and Joseph Vance re Pacific Premier Bank mediation preparation; virtual meeting with Hannah Schmidt and Martha Cohn re charts for mediation (.4); telephone conference with Michael Ueltzen re deposition and mediation preparation (.3); draft deposition preparation materials for Michael Ueltzen (.5); telephone conference with counsel for Pacific Premier Bank re pretrial schedule (.2); revise draft charts and other supporting materials for mediation (.5); oversee privilege review (.4); pre-mediation meeting with mediator (2.0)
04/26/23	D. Foraker	0.8	Virtual meeting with Clyde Hamstreet, Hannah Schmidt, Tom Sand, Joseph Vance, and Edward Decker re Pacific Premier Bank mediation preparation
04/26/23	L. Giles	6.8	Review productions for trial exhibits and draft exhibit list
04/26/23	H. Harmon	0.2	Update ShareFile document repository with additional deposition transcripts for expert Michael Ueltzen's review
04/26/23	L. Peterson	0.3	Communications with Edward Decker and Heather Harmon re deposition transcripts provided to expert
04/26/23	T. Sand	6.3	Virtual meeting with Clyde Hamstreet, Hannah Schmidt, David Foraker, Joseph Vance, and Edward Decker re Pacific Premier Bank mediation preparation (.8); pre-mediation meeting with Ret. Judge Hogan, Josh Hogan, Joseph Vance, and Edward Decker (2.0); review and analyze charts for use in trial and mediation (1.0); review materials re settlement and prepare for Pacific Premier Bank mediation (2.3); conference with Ben Shattuck re jury instructions (.2)
04/26/23	B. Shattuck	6.3	Review internal Hamstreet communications for privilege (2.9); email Streamline re batch for further review for privilege review (.1); conference with Tom Sand re jury instructions (.2); draft jury instructions (3.1)
04/26/23	M. Tyler	1.2	Continue compiling list of trial exhibits re Riverview Bank

May 4, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/26/23	J. Vance	2.8	Virtual meeting with Clyde Hamstreet, Hannah Schmidt, Tom Sand, and Edward Decker re Pacific Premier Bank mediation preparation (.8); pre-mediation meeting with mediator (2.0)
04/27/23	E. Decker	8.6	Prepare for and attend Pacific Premier Bank mediation
04/27/23	D. Foraker	0.3	Communications with Clyde Hamstreet re Pacific Premier Bank mediation negotiations
04/27/23	L. Giles	6.4	Compile trial exhibit list and review document productions for exhibit list (6.2); communications with Lisa Peterson (.2)
04/27/23	L. Peterson	0.2	Communications with Lorien Giles re QuickBooks produced
04/27/23	T. Sand	9.5	Prepare for and attend Pacific Premier Bank mediation (9.0); review and revise trial plan and witness list (.5)
04/27/23	B. Shattuck	7.0	Draft jury instructions
04/27/23	M. Tyler	1.1	Continue compiling list of trial exhibits re Riverview Bank
04/27/23	J. Vance	10.5	Prepare for and attend Pacific Premier Bank mediation
04/28/23	E. Decker	3.5	Revise draft term sheet for Pacific Premier Bank settlement (.2); virtual meeting with Joseph Vance re Riverview Bank mediation preparation (.2); telephone conference with counsel for Riverview Bank (.3); virtual meeting with Mark Tyler re exhibit list (.2); revise draft exhibits lists (.2); revise draft Riverview Bank mediation brief (1.5); attend Pacific Premier Bank mediation (.9)
04/28/23	D. Foraker	2.4	Virtual meeting with Joseph Vance (.6) and telephone conference with Clyde Hamstreet (.3) re Pacific Premier Bank mediated settlement terms; email to Clyde Hamstreet, Hannah Schmidt, and litigation team re issues relating to mediated bank settlements (1.4); review email from Shannon Armstrong re investor claims bar order issue (.1)
04/28/23	L. Giles	0.4	Review draft exhibit list and related correspondence

May 4, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
04/28/23	L. Peterson	0.1	Email to Joseph Vance re deposition videos for Ross Miles and Maureen Wile
04/28/23	T. Sand	3.3	Prepare for and attend Pacific Premier Bank mediation (3.0); email David Foraker re settlement strategy (.2); review and revise draft term sheet for Pacific Premier Bank settlement (.1)
04/28/23	B. Shattuck	2.1	Draft jury instructions
04/28/23	M. Tyler	0.2	Virtual meeting with Edward Decker re exhibit list
04/28/23	J. Vance	5.7	Virtual meeting with David Foraker re Pacific Premier Bank mediated settlement terms (.6); analyze cases re claims bar orders (1.9); virtual meeting with Edward Decker re Riverview Bank mediation preparation (.2); attend Pacific Premier Bank mediation (3.0)

Fee Summary

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
T. Sand	Partner	35.3	\$865	\$30,534.50
D. Foraker	Partner	9.3	685	6,370.50
J. Vance	Partner	55.0	580	31,900.00
E. Decker	Partner	54.4	505	27,472.00
L. Giles	Associate	25.7	425	10,922.50
M. Tyler	Associate	15.1	395	5,964.50
B. Shattuck	Associate	70.5	370	26,085.00
L. Peterson	Paralegal	17.3	305	5,276.50
A. Baxter	Paralegal	1.1	285	313.50
H. Harmon	Paralegal	0.9	245	220.50
Summary Total:		284.6		\$145,059.50

May 4, 2023

Disbursement Summary

<u>Disbursements</u>	<u>Amount</u>
Streamline Imaging (ACH); Invoice#: 37685; Relativity data storage and users	2,185.00
Parking for client meeting	17.00
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6396104; Original transcript for Ross Miles	801.95
Fee for copy of video recording of hearing held 3/28/23 before Judge Gregerson	27.00
Veritext Corp DBA NationalDepo (ACH); Invoice#: 6486245; Transcript services	677.25
Disbursement Total:	\$3,708.20

Invoice Summary

Professional Fees Through April 30, 2023	\$145,059.50
Disbursements	<u>\$3,708.20</u>
Amount Due - Current Period:	<u>\$148,767.70</u>

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 April 2023

Date	Description	Person	Hours	Rate	Amount
4/3/2023	Read Defense reports, background materials, and call with counsel	MU	3.5	450.00	\$ 1,575.00
4/5/2023	Mediation Report and related analysis	MU	5.9	450.00	2,655.00
4/6/2023	Outline Mediation issues	MU	1.2	450.00	540.00
4/7/2023	Call and development of Mediation briefing	MU	4.4	450.00	1,980.00
4/9/2023	Final review and edits	MU	1.9	450.00	855.00
4/10/2023	Call and preparation of materials	MU	2.1	450.00	945.00
4/11/2023	Review of Def. materials	MU	2.2	450.00	990.00
4/13/2023	Call with team and review of materials	MU	1.5	450.00	675.00
4/25/2023	Preparation for mediation	MU	2.5	450.00	1,125.00
4/26/2023	Calls and preparation for PPB	MU	3.5	450.00	1,575.00
4/27/2023	Preparation of outline for Mediator	MU	4.2	450.00	1,890.00
4/29/2023	Review of files - preparation for deposition	MU	6.8	450.00	3,060.00
4/30/2023	Review of files - preparation for deposition	MU	6.5	450.00	<u>2,925.00</u>
	Total				<u>\$ 20,790.00</u>

EXHIBIT D



INVOICE

Gard Communications
1140 SW 11th, Suite 300
Portland, OR 97205

Hannah Schmidt
Hamstreet & Associates - AEM
General Receiver in American Eagle Mortgage
Receivership Proceedings
John.Knapp@MillerNash.com
David.Foraker@MillerNash.com
hschmidt@hamstreet.net

Number	15193
Date	04/30/23
Job Number	AEM-003
PO#	--
Charge#	--

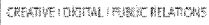
Job Name: Microsite Updates & Maintenance

Agency Contact Mary Wasson

Description: For professional services rendered through April 2023

Description	Hours Billed	Amount
Account Services	0.80	\$105.00
Professional Services Subtotal:	0.80	\$105.00
 TOTAL:	 0.80	 \$105.00

PAYMENT TERMS: net 30 days



Invoice : 15193 Client : Hamstreet & Associates - AEM (AEM)

05/08/23 12:29 PM
(TP)

AEM-003 Microsite Updates & Maintenance

Account Services:				Rate	Hrs	Amount
408536	04/05/23 Acct admin	NK	Naureen Khan	\$175.00	0.10	\$17.50
409299	04/13/23 Document upload	MW	Mary Wasson	\$125.00	0.20	\$25.00
410429	04/27/23 Document upload	MW	Mary Wasson	\$125.00	0.50	\$62.50
					0.80	\$105.00
AEM-003 TOTAL					0.80	\$105.00
INVOICE #15193 TOTAL:					0.80	\$105.00

EXHIBIT E



Real Estate • Hospitality • Cross-Border Transactions

T +52 (624) 146.9205 | Toll Free USA 1 (877) 773.3172

Cri. Transp. Km. 30. Plaza Los Portales, Local 205

C.P. 23406, San Jose del Cabo, B.C.S., México

INVOICE

Invoice # 22658

Date: 05/10/2023

Due On: 05/25/2023

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

General Advisory - Mar de Plata

Attorney	Date	Notes	Quantity	Rate	Total
JB	03/29/2023	Issue quotes for the apostille of the corporate documents of AMEX 200, LLC and communication with Mobile Notary to issue Cert of good standing.	1.00	\$100.00	\$100.00
OV	04/04/2023	Draft: Amendment of Promise to Purchase, Sell or Transfer into Trust Agreement, for designation of a notary public by the purchaser; both English and Spanish versions.	2.50	\$130.00	\$325.00
OV	04/04/2023	Analyze: background to prepare Amendment of Promise to Purchase, Sell or Transfer into Trust Agreement, for designation of a notary public by the purchaser; both English and Spanish versions.	1.00	\$130.00	\$130.00
IM	04/04/2023	Concall wOscar re. revisions to Addendum and public notaries	0.40	\$130.00	\$52.00
BR	04/11/2023	Communications: Client, team re: purchase docs terms, comments from prospective purchaser's counsel.	0.30	\$350.00	\$105.00
IM	04/11/2023	Overview MDP closings; meeting wNat re. same; pendings and general status	0.60	\$130.00	\$78.00
OV	04/12/2023	Draft: Memorandum with information of Controlling Beneficiary and obligations before Mexican compliance authorities.	2.50	\$130.00	\$325.00
OV	04/12/2023	Analyze: information of Controlling Beneficiary and obligations before Mexican compliance authorities to draft memorandum.	1.25	\$130.00	\$162.50
OV	04/13/2023	Communications: with US notary to notarize and apostille corporate documents of AEM 200, for the mortgage cancelation of Anthony Tremayne.	0.50	\$130.00	\$65.00

JB	04/13/2023	Issue AEMM 200, LLC Certificate of Good standing through Secretary of State.	1.00	\$100.00	\$100.00
OV	04/17/2023	Communications: Answer questions and comments of Daniel Couttolenc of Lot 18	0.50	\$130.00	\$65.00
OV	04/17/2023	Communications: answering questions of Daniel Couttolenc regarding promise to purchase agreement.	0.50	\$130.00	\$65.00
OV	04/18/2023	Communications: with US notary and internal communications, and review of documents of AEM 500 with Michael James Hines to notarize and apostille documents.	1.50	\$130.00	\$195.00
IM	04/18/2023	meeting wTeam re. HOA formation; review pendings and process for Closings	0.50	\$130.00	\$65.00
IM	04/19/2023	Concall Oscar and Ben re: HOA formation and structure.	0.50	\$130.00	\$65.00
JB	04/21/2023	Search for Mobile Notary to Apostille missing documents.	1.42	\$100.00	\$142.00
JB	04/24/2023	Communication with Eleni (Apostille Service) Re: Apostille Copies.	0.50	\$100.00	\$50.00
BR	04/25/2023	Meeting: attny Ingrid to Review checklist and deliverables to enable AEM to close on transfer of title to Mar de Plata lots; confer with team re: HOA formation and options to expedite. Brainstorm.	1.00	\$350.00	\$350.00
IM	04/25/2023	Meeting Ben to review checklist and AEM deliverables to transfer title MDP lots; HOA formation and options to expedite.	1.00	\$130.00	\$130.00
OV	04/26/2023	Draft: memorandum of anti-money laundering compliance applicable to AEM.	2.50	\$130.00	\$325.00
IM	04/26/2023	email to team re. CC&Rs and Design Guidelines translation; communications wNat re. same	0.40	\$130.00	\$52.00
JB	04/26/2023	Communications: Eleni for AEM 200, LLC Corp docs Apostille.	0.75	\$100.00	\$75.00
JB	04/26/2023	Communications: Notary 17 Milton Re: Initial documentation Checklist.	0.50	\$100.00	\$50.00
IM	04/27/2023	review EIS requirements, communications wEvelyn; internal	0.40	\$130.00	\$52.00
JB	04/27/2023	Communication with Milton Re: AEM 200 Cor documents. Save and OCR.	0.50	\$100.00	\$50.00
IM	04/28/2023	Meeting wNataly re. MDP closings; revisions to Closings Spreadsheet; review documents and pendings	0.80	\$130.00	\$104.00
				Subtotal	\$3,277.50

General Advisory

Attorney	Date	Notes	Quantity	Rate	Total
IM	04/11/2023	call wOscar re. POA and apostille Hines; review of docs; discuss wBen re. same	0.50	\$130.00	\$65.00
JB	04/13/2023	Request Notary's Quotes to apostille AEMMX 200, LLC corp documnt. Process Authorization	1.00	\$100.00	\$100.00
BR	04/18/2023	Communications: Zoom meeting client re: diverse pending matters.	1.00	\$350.00	\$350.00
BR	04/24/2023	Communications: Client, CPA Salvador re: distrubuting proceeds from real property sales.	0.30	\$350.00	\$105.00
BR	04/25/2023	Communications: Phone call Centeno re: Mar de Plata tax advisory services, general audit/review of structures, return of capital; confer with Salvador; email client re: same.	1.00	\$350.00	\$350.00
IM	04/27/2023	Call Oscar re. POA Hines (sea breeze)	0.20	\$130.00	\$26.00
IM	04/27/2023	Call Oscar re.POA AEM 600, Tremayne	0.30	\$130.00	\$39.00
BR	04/30/2023	Local Management & Banking Support April, 2023	1.00	\$200.00	\$200.00
				Subtotal	\$1,235.00

Mar de Plata HOA Formation

Subtotal **\$0.00**

Subtotal **\$4,512.50**

Total **\$4,512.50**

Detailed Statement of Account

Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
22658	05/25/2023	\$4,512.50	\$0.00	\$4,512.50

Outstanding Balance	\$4,512.50
Total Amount Outstanding	\$4,512.50

Please make all amounts payable to: Rosen Law

Please pay within 15 days.

EXHIBIT F

KRESTON BSG

KB5110829KX4

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: B88DB1B0-F5B9-4057-81C5-5E5B6DF034B0
No. de Serie Cert. del SAT: 00001000000505142236
Fecha y hora de Certificación: 2023-05-04 22:33:52

DATOS DE ELABORACIÓN

2023-05-04 22:33:51

Serie y Folio Interno: K1300021260
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

CANTIDAD	DESCRIPCIÓN	UNIDAD DE MEDIDA	PRECIO UNITARIO	IMPORTE
1	84111600 Auditoria de Estados Financieros	1 - E48	3,075.00	3,075.00

Auditoria de Estados Financieros Parcialidad 2/4

Forma de Pago: 99 - Por definir - Tipo de Cambio: 18.0325

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

Subtotal: 3,075.00
IVA 16%: 0.00
Total: 3,075.00

SELLO SAT

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SELLO DIGITAL DEL CFDI

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CADENA ORIGINAL DEL COMPLEMENTO DE CERTIFICACIÓN DEL SAT

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