

**E-FILED**  
**08-11-2023, 10:38**  
**Scott G. Weber, Clerk**  
**Clark County**

29 pages

**SUPERIOR COURT OF WASHINGTON FOR CLARK COUNTY**

In re:

Case No. 19-2-01458-06

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

4883-7479-6405.1

**MILLER NASH LLP**  
 ATTORNEYS AT LAW  
 T: 206.624.8300 | F: 206.340.9599  
 605 5<sup>TH</sup> 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 (July 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 July 2023. For this period, the Receiver requests final  
14 approval of its compensation in the amount of \$41,189.00 and reimbursement of costs of  
15 \$4,837.75, for a total payment of \$46,026.75.

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 July 2023. For  
18 this period, such attorneys request final approval of their compensation in the amount of  
19 \$25,422.50 and reimbursement of costs of \$9,765.98, for a total payment of \$35,188.48.

20 Attached as Exhibit C hereto is a true and correct copy of the time and expense summary  
21 of the Receiver’s authorized public communications consultants, Gard Communications, Inc., for  
22 services and costs in July 2023. For this period, such consultants request final approval of their  
23 compensation in the amount of \$605.00 and reimbursement of no costs, for a total payment of  
24 \$605.00.

25 Attached as Exhibit D hereto is a true and correct copy of the time and expense summary  
26 of the Receiver’s authorized special counsel in Mexico, Rosen Law, S.C., for services and costs

1 in July 2023. For this period, such attorneys request final approval of their compensation in the  
2 amount of \$5,221.74 and reimbursement of no costs, for a total payment of \$5,221.74.

3 Unless objections to the foregoing requests are filed with the Court and served on the  
4 undersigned attorneys so as to be received by August 24, 2023, the Receiver may make the  
5 payments requested herein and/or the professionals may apply their retainers, if any.

6 DATED this 11<sup>th</sup> day of August, 2023.

7 MILLER NASH LLP

8  
9 /s/ John R. Knapp, Jr.

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

11 Attorneys for Receiver  
12 Clyde A. Hamstreet & Associates, LLC  
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# EXHIBIT A





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

Invoice submitted to:

American Eagle Mortgage Investment Funds Receiverships  
4225 NE St James Road  
Vancouver, WA 98663

August 8, 2023

Invoice # 2632

Professional Services

			<u>Hours</u>	<u>Amount</u>
7/5/2023	MC	Receivership Duties Respond to investor inquiries and pursue claims transfer question. Update website. Evergreen payment histories.	2.90	464.00
7/6/2023	HS	Receivership Duties Call with Edward Decker regarding investor meeting. Follow up emails regarding same.	0.20	100.00
	HS	Receivership Duties Read and respond to emails. Review website updates for accuracy.	0.30	150.00
	MC	Receivership Duties Respond to investor communications, update addresses and RSVPs. Begin drafting presentation.	1.10	176.00
	MC	Receivership Duties Evergreen reconcilitaion.	3.10	496.00
7/7/2023	MC	Receivership Duties Calls with investors. Call with John Knapp. Resolve address and administration issues. Draft presentation.	2.30	368.00
7/8/2023	HS	Receivership Duties Review communication with Jim Hart and draft email to Jim regarding environmental status and message to Andrew Sutcliff regarding same.	0.90	450.00
7/10/2023	HS	Receivership Duties Emails regarding Mar de Plata permit issues.	1.00	500.00
	CAH	Receivership Duties Sign documents regarding sale of 30 acre property in Montana.	0.20	125.00
	MC	Receivership Duties Return investors calls and emails. Take care of accounting and real estate sale paperwork. Begin quarterly reporting.	2.10	336.00

			<u>Hours</u>	<u>Amount</u>
7/11/2023	HS	Investor Relations Call with Patricia Schafer.	0.30	150.00
	HS	Receivership Duties Call with Mar de Plata team regarding environmental issues. Follow up work regarding same.	0.60	300.00
	HS	Receivership Duties Work with Clyde Hamstreet and Martha Cohn regarding investor meeting.	1.50	750.00
	CAH	Receivership Duties Work with Hannah Schmidt and Martha Cohn on preparations for investors meeting. Decisions regarding listing coastal property. Review Mexico environmental problem regarding Mar de Plata.	3.20	2,000.00
	HS	Receivership Duties Prepare for and call with SEC.	0.40	200.00
	MC	Receivership Duties Prepare materials and coordinate logistics for investor meeting.	4.20	672.00
	MC	Receivership Duties Quarterly reporting.	1.00	160.00
7/12/2023	HS	Receivership Duties Sign listing agreement for Bayside Gardens house. Emails with agent regarding same.	0.30	150.00
	CAH	Receivership Duties Review emails from legal counsel and some oversight on preparations for investors meeting. Update on Mar de Plata environmental problems and termination of real estate broker.	1.10	687.50
	HS	Receivership Duties Calls regarding Mar de Plata environmental issues.	1.00	500.00
	MC	Receivership Duties Prepare materials for investor meeting. Respond to RSVPs and investor questions.	5.00	800.00
7/13/2023	CAH	Receivership Duties Work with Hannah Schmidt, Martha Cohn and Miller Nash on presentation for investors meeting.	1.80	1,125.00
	HS	Investor Relations Review slides and outline for investor meeting. Work with Clyde Hamstreet and Martha Cohn regarding same. Call with Edward Decker and John Knapp regarding same.	3.00	1,500.00
	MC	Receivership Duties Review presentation and materials with team. Continue work on materials.	4.50	720.00

			<u>Hours</u>	<u>Amount</u>
7/13/2023	MC	Receivership Duties Call with John Knapp on claim transfer question and follow up.	0.40	64.00
7/14/2023	CAH	Receivership Duties Review fee filing. Discuss Mar de Plata environmental and real estate broker problems with Hannah Schmidt and Veronica Hamstreet.	0.50	312.50
	HS	Investor Relations Work on investor presentation.	3.50	1,750.00
	HS	Receivership Duties Calls and emails regarding Mar de Plata.	0.50	250.00
	MC	Receivership Duties Create charts and graphics for investor meeting.	2.60	416.00
	MC	Receivership Duties Respond to RSVPs, address changes, and returned mail. Contact investor on transfer of claim question.	1.10	176.00
7/17/2023	HS	Receivership Duties Calls and emails regarding Mar de Plata.	0.40	200.00
	HS	Investor Relations Meet with Edward Decker, Martha Cohn and Clyde Hamstreet regarding investor meeting. Follow up work regarding same.	3.80	1,900.00
	CAH	Receivership Duties Work on preparing for investors meeting including two work sessions with Edward Decker, Martha Cohn, Hannah Schmidt and Veronica Hamstreet in one of sessions.	7.20	4,500.00
	MC	Receivership Duties Final review and correction of meeting materials. Final preparations for meeting.	8.80	1,408.00
7/18/2023	CAH	Receivership Duties Prepare for and co- lead investors meeting.	5.00	3,125.00
	HS	Investor Relations Prepare for and participate in investor meeting.	5.00	2,500.00
	HS	Receivership Duties Work on quarterly reporting.	1.30	650.00
	MC	Receivership Duties Attend investor meeting.	4.30	688.00
	MC	Receivership Duties Organize meeting and Q&A notes for summary.	1.00	160.00
7/19/2023	CAH	Receivership Duties Review follow up emails from presentation and written questions.	0.40	250.00

			<u>Hours</u>	<u>Amount</u>
7/19/2023	HS	Receivership Duties Calls with Martha Cohn regarding investor meeting.	0.30	150.00
	MC	Receivership Duties Respond to investor feedback about meeting. Draft responses to investor questions.	2.10	336.00
	MC	Receivership Duties Quarterly reporting.	2.00	320.00
7/20/2023	MC	Receivership Duties Communications with investors. Correct errors in slide presentation and begin work on summary.	3.00	480.00
7/21/2023	HS	Receivership Duties Work on quarterly report and send draft to John Knapp and David Foraker.	1.00	500.00
	MC	Receivership Duties Response to investor questions and voicemails. Update Q&A. Review investor meeting attendees and feedback. Draft narrative.	3.80	608.00
7/24/2023	HS	Receivership Duties Read and respond to emails.	0.50	250.00
	CAH	Receivership Duties Review and respond to emails regarding settlement.	0.30	187.50
	HS	Receivership Duties Call with SEC. Follow up regarding same.	1.20	600.00
	MC	Receivership Duties Draft notice of sale on Nehalem. Respond to investor feedback and update spreadsheet.	1.80	288.00
7/25/2023	CAH	Receivership Duties Follow up with Hannah Schmidt and Martha Cohn on reports and sale of coastal lot in Nehalem. Review Martha Cohn draft documents.	4.60	2,875.00
	HS	Receivership Duties Review meeting summary and send comments to Martha Cohn.	1.20	600.00
	MC	Receivership Duties Finalize slides and narrative to post. Communications with investors.	3.70	592.00
7/26/2023	CAH	Receivership Duties Work on completion of materials summarizing investors meeting to web.	0.70	437.50
	HS	Receivership Duties Calls with Martha Cohn regarding investor meeting summary.	0.20	100.00
	MC	Receivership Duties Final notes and meeting on narrative summary. Upload to website.	2.10	336.00



		<u>Hours</u>	<u>Amount</u>
7/27/2023	HS Receivership Duties Discussion with Martha Cohn regarding investor summary of meeting. Read and respond to emails from July 26.	0.50	250.00
	HS Receivership Duties Add bank settlements to quarterly report and send update to John Knapp.	0.40	200.00
7/30/2023	HS Receivership Duties Make changes to quarterly report and send update to John Knapp.	0.20	100.00
7/31/2023	HS Receivership Duties Emails regarding sale of Bayside Gardens.	0.30	150.00
	HS Receivership Duties Call with Andrew Jasco regarding Mar de Plata status.	0.20	100.00
	HS Receivership Duties Research and email to John Knapp regarding David Kelly Objection.	0.80	400.00
	HS Receivership Duties Initiate wire transfers to Mexico.	0.20	100.00
<b>For professional services rendered</b>		<b>118.90</b>	<b>\$41,189.00</b>

## Additional Charges :

		<u>Price</u>	<u>Qty</u>	
7/18/2023	AEM investors meeting on 7/18/2023. 70+ investors attended. Room rental, food and audiovisual service.	\$4,837.75	1	4,837.75
<b>Total additional charges</b>				<b>\$4,837.75</b>

**Total amount of this bill****\$46,026.75**

## Accounts receivable transactions

7/10/2023	Payment invoice #2621- Thank You. Check No. 1709	(\$44,938.50)
8/4/2023	Payment invoice #2626 - Thank You	(\$20,950.04)
<b>Total payments and adjustments</b>		<b>(\$65,888.54)</b>

## Balance due

**\$46,026.75**

## Consultant Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Clyde A. Hamstreet - Principal	25.00	625.00	\$15,625.00
Hannah Schmidt - Consultant	31.00	500.00	\$15,500.00



Name	Hours	Rate	Amount
Martha Cohn - Jr. Consultant	62.90	160.00	\$10,064.00

# EXHIBIT B

Client.Matter	Description	Bill Amt	Fees	Costs	Bill Num
721921.0001	American Eagle Mortgage Investment Funds	\$31,843.48	\$23,762.50	\$8,080.98	2214898
721921.0017	Adjunct Litigation Claims Against Ross Miles, Maureen Wile, et al.	\$3,345.00	\$1,660.00	\$1,685.00	2214899
		\$35,188.48	\$25,422.50	\$9,765.98	

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: 2214898  
August 2, 2023

**Invoice Summary**

Professional Fees Through July 31, 2023	\$23,762.50
Disbursements	\$8,080.98
<b>Amount Due – Current Period:</b>	<b><u>\$31,843.48</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.

August 2, 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>
07/03/23	J. Knapp	0.2	Emails with Nancy Carrasco and Hannah Schmidt re Mexico audit
07/05/23	D. Foraker	0.1	Emails with Hannah Schmidt re receiver's sixteenth quarterly report
07/05/23	J. Knapp	0.5	Emails with Martha Cohn re Roderick Bosch claim transfer documentation (.3); review claims register, proofs of claim, and claim transfer documentation (.2)
07/06/23	E. Decker	0.5	Confer with John Knapp re investor meeting (.3); telephone conference with Hannah Schmidt re investor meeting (.2)
07/06/23	J. Knapp	1.3	Emails with Veronica Hamstreet and Tanya Partem re notice of intent to compensate (June 2023) (.4); draft notice of intent to compensate (June 2023) (.4); confer with Edward Decker re investor meeting (.3); emails with Hannah Schmidt re investor meeting (.2)
07/07/23	J. Knapp	0.9	Communications with Martha Cohn re Roderick Bosch claim transfer (.3); email communications with Montserrath Ramirez re notice of intent to compensate (June 2023) (.2); continue drafting notice of intent to compensate (June 2023) (.4)
07/09/23	D. Foraker	0.1	Email to Chris Kayser et al re 7/10 bi-monthly meeting
07/10/23	J. Knapp	0.5	Emails re bi-monthly meeting with AEM investors' counsel (.3); email communications with Martha Cohn re receiver's sixteenth quarterly report (.2)
07/11/23	J. Knapp	1.0	Virtual meeting with Kashya Shei and Hannah Schmidt re SEC matters (.3); email communications with Gloria Rios re notice of intent to compensate (June 2023) (.2); continue drafting notice of intent to compensate (June 2023) (.3); email communications with Michael Ueltzen re notice of intent to compensate (June 2023) (.2)



August 2, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/12/23	B. Dickey	0.3	Prepare and file American Eagle Mortgage 300, LLC annual report with Washington Secretary of State
07/12/23	D. Foraker	0.2	Review email from Mike Esler re Oregon AEM investors' planned attendance at upcoming investor meeting and related emails
07/12/23	J. Knapp	0.6	Email communications with Michael Ueltzen re notice of intent to compensate (June 2023) (.2); continue drafting notice of intent to compensate (June 2023) (.4)
07/13/23	E. Decker	1.1	Virtual meeting with Clyde Hamstreet, Hannah Schmidt, Martha Cohn, and John Knapp re investor meeting planning
07/13/23	D. Foraker	0.2	Emails with Hannah Schmidt and Mike Esler re investor meeting (.1); emails with Hannah Schmidt re summary report of Miller Nash invoices for AEM receivership services (.1)
07/13/23	J. Knapp	1.8	Virtual meeting with Clyde Hamstreet, Hannah Schmidt, Martha Cohn, and Edward Decker re investor meeting planning (1.1); virtual meeting with Martha Cohn re Robert Laws claim transfer (.3); continue drafting notice of intent to compensate (June 2023) (.4)
07/14/23	E. Decker	2.3	Revise draft presentation for investor meeting (1.1); prepare for investor meeting (1.0); confer with Tom Sand re bank settlement matters (.2)
07/14/23	J. Knapp	0.2	Finalize notice of intent to compensate (June 2023)
07/14/23	T. Sand	0.2	Confer with Edward Decker
07/17/23	E. Decker	4.5	Virtual meetings with Hannah Schmidt, Clyde Hamstreet, and Martha Cohn re preparation for investor meeting (1.8); confer with Tom Sand re preparation for investor meeting (.4); review and revise draft presentation materials for investor meeting (2.3)

August 2, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/17/23	D. Foraker	0.7	Emails with Mike Esler and Jon Hunt re follow up on investor meeting attendance matters (.2); emails re investor meeting preparation and review drafts of investor meeting materials (.5)
07/17/23	J. Knapp	1.0	Review and comment on drafts of investor meeting materials (.2); email communications with Martha Cohn re mailing list, investor meeting, and amended hearing citations (.4); draft amended hearing citations (.4)
07/17/23	T. Sand	0.4	Confer with Edward Decker re preparation for investor meeting
07/18/23	E. Decker	3.6	Prepare for and attend investor meeting
07/18/23	D. Foraker	0.2	Emails re investor meeting
07/18/23	J. Knapp	2.6	Attend investor meeting via Zoom (2.0); emails with Hannah Schmidt and Martha Cohn re MIMO question (.2); review tax lien and environmental notices re Montana property (.2); emails with Hannah Schmidt re Montana property notices (.2)
07/18/23	T. Sand	0.3	Confer with Edward Decker re preparation for investor meeting
07/19/23	E. Decker	0.2	Revise draft responses to investor questions and related emails
07/20/23	J. Knapp	0.2	Emails with Martha Cohn re master mailing list
07/20/23	T. Sand	0.2	Emails re investor meeting
07/21/23	E. Decker	0.7	Revise draft responses to investor questions and related emails
07/24/23	E. Decker	1.3	Virtual meeting with AEM investors' counsel (.5); analyze Zoller deposition transcript in response to question from SEC (.4); revise draft asset summary in response to question from SEC (.4)
07/24/23	D. Foraker	0.1	Email to Chris Kayser et al re cancellation of bi-weekly meetings and related emails

August 2, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/24/23	J. Knapp	1.5	Emails with Hannah Schmdit re Nehalem, Oregon, property sale (.2); draft Nehalem, Oregon, sale notice (.8); voicemail from and telephone call with Martha Cohn re Douglas Howden claim (.3); review emails re Oregon and Beattie plaintiffs (.2)
07/25/23	E. Decker	0.4	Review and revise draft investor meeting summary
07/25/23	D. Foraker	1.8	Review email from Martha Cohn with investor meeting memo, investor meeting slide presentation, and spreadsheet listing investors who attended investor meeting and provided feedback on proposed settlement and series of related emails (1.5); confer with John Knapp re settlement matters (.3)
07/25/23	J. Knapp	1.2	Finalize sale notice (Nehalem, Oregon) (.2); email communications with Mary Wasson re transmittal of notice for posting to website (.2); confer with David Foraker re settlement matters (.2); email communications with Martha Cohn re summary of investor meeting (.1); review and comment on summary of investor meeting (.5)
07/26/23	E. Decker	2.2	Revise draft investor meeting summary for website (2.0); telephone call with Martha Cohn re investor update (.2)
07/26/23	D. Foraker	0.5	Emails with Martha Cohn, Edward Decker, and John Knapp re investor meeting materials and review final versions for website (.3); review draft of receiver's sixteenth quarterly report and related emails (.2)
07/26/23	J. Knapp	1.7	Review and comment on investor meeting summary for website (.4); review and revise receiver's sixteenth quarterly report (1.3)
07/27/23	J. Knapp	0.3	Emails with Hannah Schmidt re receiver's sixteenth quarterly report (.2); voicemail from David Kelly re objection to receiver's distribution motion (.1)
07/28/23	J. Knapp	1.0	Review court docket (.2); emails with Hannah Schmidt re notice of intent to compensate (June 2023) (.2); draft notice of filing of receiver's quarterly report (.4); emails with Hannah Schmidt re quarterly report (.2)

August 2, 2023

<u>Date</u>	<u>Professional</u>	<u>Time</u>	<u>Description of Services</u>
07/31/23	E. Decker	0.2	Review David Kelly's letter objection to motion to maintain and restore MIMO claims and related emails
07/31/23	D. Foraker	0.3	Review David Kelly's letter objection to receiver's motion to maintain and restore MIMO claims of certain investors and related emails
07/31/23	J. Knapp	1.5	Emails with Hannah Schmidt re receiver's sixteenth quarterly report (.2); finalize quarterly report (.4); emails with Hannah Schmidt re notice of intent to compensate (June 2023) (.1); review and analyze David Kelly's letter objection to motion to maintain and restore MIMO claims (.4); emails with Hannah Schmidt, Clyde Hamstreet, and Martha Cohn re David Kelly's letter objection (.4)

**Fee Summary**

<u>Professional</u>	<u>Title</u>	<u>Time</u>	<u>Rate</u>	<u>Amount</u>
T. Sand	Partner	1.1	\$865	\$951.50
D. Foraker	Partner	4.2	685	2,877.00
J. Knapp	Partner	18.0	625	11,250.00
E. Decker	Partner	17.0	505	8,585.00
B. Dickey	Paralegal	0.3	330	99.00
<b>Summary Total:</b>		<b>40.6</b>		<b>\$23,762.50</b>

**Disbursement Summary**

<u>Disbursements</u>	<u>Amount</u>
Washington Secretary of State: Annual filing fee for American Eagle Mortgage 300, LLC	60.00
BK Attorney Services: Cost of mailing claims motion through third party mailing service	1,484.52
BK Attorney Services: Cost of mailing settlement motion through third party mailing service	6,262.62
BK Attorney Services: Cost of mailing amended citations to full mailing matrix	273.84
<b>Disbursement Total:</b>	<b>\$8,080.98</b>

**Invoice Summary**

Professional Fees Through July 31, 2023	\$23,762.50
Disbursements	\$8,080.98
<b>Amount Due - Current Period:</b>	<b><u>\$31,843.48</u></b>

Account: 721921

Invoice: 2214898

August 2, 2023



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: 2214899  
August 2, 2023

**Invoice Summary**

Professional Fees Through July 31, 2023	\$1,660.00
Disbursements	<u>\$1,685.00</u>
<b>Amount Due – Current Period:</b>	<b><u>\$3,345.00</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.

August 2, 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>
07/11/23	T. Sand	0.2	Telephone call with Seth Wilkinson (Assistant U. S. Attorney) re status of AEM criminal investigation
07/12/23	H. Harmon	0.3	Research case file for contacts with U.S. Department of Justice Oregon District
07/14/23	T. Sand	0.2	Telephone call with Ryan Bounds (Assistant U.S. Attorney) re status of AEM criminal investigation
07/27/23	E. Decker	0.9	Confer with David Foraker and John Knapp re investigation of possible fraudulent transfer claims (.6); investigate Ross and Beverly Miles divorce decree (.3)
07/27/23	D. Foraker	0.6	Confer with Edward Decker and John Knapp re investigation of fraudulent transfer claims
07/27/23	J. Knapp	0.6	Confer with David Foraker and Edward Decker re investigation of possible fraudulent transfer claims

**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>
T. Sand	Partner	0.4	\$865	\$346.00
D. Foraker	Partner	0.6	685	411.00
J. Knapp	Partner	0.6	625	375.00
E. Decker	Partner	0.9	505	454.50
H. Harmon	Paralegal	0.3	245	73.50
<b>Summary Total:</b>		<b>2.8</b>		<b>\$1,660.00</b>

**Disbursement Summary**

<b><u>Disbursements</u></b>	<b><u>Amount</u></b>
Streamline Imaging (ACH); Invoice#: 38264; June data usage	1,685.00
<b>Disbursement Total:</b>	<b>\$1,685.00</b>

Account: 721921

Invoice: 2214899

August 2, 2023

**Invoice Summary**

Professional Fees Through July 31, 2023	\$1,660.00
Disbursements	<u>\$1,685.00</u>
<b>Amount Due - Current Period:</b>	<b><u>\$3,345.00</u></b>

# EXHIBIT C



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  
Receivership Proceedings  
John.Knapp@MillerNash.com  
David.Foraker@MillerNash.com  
hschmidt@hamstreet.net

<b>Number</b>	15455
<b>Date</b>	07/31/23
<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 July 2023

Description	Hours Billed	Amount
Account Services	4.20	\$605.00
<b>Professional Services Subtotal:</b>	<b>4.20</b>	<b>\$605.00</b>
 <b>TOTAL:</b>	 <b>4.20</b>	 <b>\$605.00</b>

**PAYMENT TERMS:** net 30 days



## Invoice Detail Report

Invoice : 15455 Client : Hamstreet & Associates - AEM (AEM)

**Page 1**

08/08/23 4:59 PM  
(TP)

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

**AEM-003      Microsite Updates & Maintenance**

Account Services:				Rate	Hrs	Amount
417094	07/05/23	MW Document uploads	Mary Wasson	\$125.00	0.50	\$62.50
417131	07/11/23	MW Document uploads / website updates	Mary Wasson	\$125.00	0.50	\$62.50
418305	07/14/23	MW Document uploads	Mary Wasson	\$125.00	0.50	\$62.50
418314	07/17/23	MW Document upload	Mary Wasson	\$125.00	0.50	\$62.50
418365	07/25/23	MW Document upload	Mary Wasson	\$125.00	0.50	\$62.50
418369	07/26/23	MW Document uploads	Mary Wasson	\$125.00	0.50	\$62.50
418555	07/26/23	NK Account admin	Naureen Khan	\$175.00	0.20	\$35.00
418385	07/27/23	MW Document upload	Mary Wasson	\$125.00	0.20	\$25.00
418467	07/27/23	JS Discuss client w SG	Julia Stoops	\$225.00	0.30	\$67.50
418862	07/31/23	JS Discuss client and work w team	Julia Stoops	\$225.00	0.30	\$67.50
418902	07/31/23	NK Upload	Naureen Khan	\$175.00	0.20	\$35.00
					<b>4.20</b>	<b>\$605.00</b>
<b>AEM-003 TOTAL</b>					<b>4.20</b>	<b>\$605.00</b>
<b>INVOICE #15455 TOTAL:</b>					<b>4.20</b>	<b>\$605.00</b>

# EXHIBIT D



Real Estate • Hospitality • Cross-Border Transactions

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

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

## INVOICE

Invoice # 22751

Date: 08/03/2023

Due On: 08/18/2023

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
OV	07/03/2023	Define and send the final version of the memorandum of anti-money laundering.	0.50	\$130.00	\$65.00
IM	07/04/2023	Communications: wOscar and Ben re. diverse matters, bylaws, tremayne, etc	0.25	\$130.00	\$32.50
OV	07/06/2023	Draft: termination services agreement of James Hart.	3.50	\$130.00	\$455.00
BR	07/10/2023	Communications: Phone call Jim Hart. Messages Hannah, Valerio. Confer with Nat and Ingrid.	0.40	\$350.00	\$140.00
IM	07/10/2023	Communications: wBen and Nat re. MDP closings, EIS	0.15	\$130.00	\$19.50
BR	07/11/2023	Draft: Jim Hart termination agreement. Confer with Ingrid and Hannah re diverse matters. Execute PSA; birefly confer Hannah and Ingrid re: PROFEPA/ SEMARNAT update.	0.80	\$350.00	\$280.00
IM	07/11/2023	Communications: Discussions wBen re. Jim Hart termination agreement. Concall wBen and Hannah re: PROFEPA/EIS update.	1.00	\$130.00	\$130.00
OV	07/11/2023	Review the information for the KYC for BBVA and the documents of Aememmx.	2.50	\$130.00	\$325.00
BR	07/12/2023	Communications: Concall client, Maris, Valerio re environmental situation. Consult with our environmental litigation attorney for a second opinion. Follow up call Maris. Draft and send report to Hannah.	2.20	\$350.00	\$770.00
BR	07/12/2023	Communications: Meeting Jim Hart re contract termination and Andrew situation. Brief Hannah. Follow up communications Hart. Phone call and texts Andrew. Confer with Ingrid re termination agreement and prospects list.	1.80	\$350.00	\$630.00



IM	07/12/2023	Communications: Conference call wClient, Maris Team, Valerio re PROFEPA process. Contact Maris for a call. Follow up discussion wBen. Review of docs and send follow up email to Maris wDocs	2.40	\$130.00	\$312.00
IM	07/12/2023	Review: review of Termination agreement; communications wJim Hart re. prospective buyers for MDP, revisions to exhibit and agreement; send and discuss wBen on revisions and review	1.00	\$130.00	\$130.00
AA	07/13/2023	Meeting: Notary Publica 17 re: signing POA cancellation of mortgage AEM 200 Tremayne.	0.50	\$100.00	\$50.00
JB	07/13/2023	review AEM 200 POA. COmmunication with Milton (Notary17) Re: Meeting with AA to sign POA Protocolization.	0.50	\$100.00	\$50.00
OV	07/13/2023	Review the information of AEM100, AEM 300 and AEM 400 for the KYCs of Aememmx.	1.00	\$130.00	\$130.00
OV	07/13/2023	Communications: with Notary to coordinate the signing of the power of attorney of AEM 200 for the mortgage cancelation of Anthony Tremayne.	0.50	\$130.00	\$65.00
BR	07/15/2023	Communications: Valerio re: proposal from Maris. Email Hannah.	0.40	\$350.00	\$140.00
BR	07/17/2023	Communications: Hannah, Valerio re: Profepa, Jim/ Andrew.	0.30	\$350.00	\$105.00
IM	07/17/2023	Review: review of Profepa response prepared by Maris; email to Maris re. adjustments; follow up on application	0.50	\$130.00	\$65.00
BR	07/24/2023	Communications: Hannah, Jim re: Profepa/commission withholding.	0.30	\$350.00	\$105.00
IM	07/25/2023	Follow up: on Profepa application	0.20	\$130.00	\$26.00
				<b>Subtotal</b>	<b>\$4,025.00</b>

## General Advisory

Attorney	Date	Notes	Quantity	Rate	Total
IM	06/27/2023	Review: wMartha re. Tamar 201 Title Deed; review correspondence, follow up on pendings wNat on contracts	0.40	\$130.00	\$52.00
IM	07/10/2023	Discussions: wOscar re. Tremayne cancelation	0.15	\$130.00	\$19.50
BR	07/13/2023	Meeting: BBVA offices to complete Controlling Beneficiary filing.	0.50	\$350.00	\$175.00
MS	07/27/2023	Follow up: & procure original deed Tamar 201 re:	0.50	\$60.00	\$30.00

cadastral manifestation w/notary 17.					
GR	07/31/2023	Local Management & Banking Support July, 2023	1.00	\$200.00	\$200.00
				<b>Subtotal</b>	<b>\$476.50</b>
				<b>Subtotal</b>	<b>\$4,501.50</b>
				<b>Tax (16.0%)</b>	<b>\$720.24</b>
				<b>Total</b>	<b>\$5,221.74</b>

## Detailed Statement of Account

### Current Invoice

Invoice Number	Due On	Amount Due	Payments Received	Balance Due
22751	08/18/2023	\$5,221.74	\$0.00	\$5,221.74
Outstanding Balance				\$5,221.74
Total Amount Outstanding				\$5,221.74

Please make all amounts payable to: Rosen Law

Please pay within 15 days.