

Respectfully submitted,

RECEIVER CORTNEY C. THOMAS

/s/ Cortney C. Thomas

Cortney C. Thomas

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CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5(d)(1)(B), as amended, no certificate of service is necessary because this document is being filed with the Court's electronic-filing system.

EXHIBIT	DESCRIPTION	APP PAGES
A	Standardized Fund Accounting Report for the period April 1, 2023 through June 30, 2023	APP001-003
B	Receiver's invoice for services provided April 1, 2023 through June 30, 2023	APP004-028
C	Brown Fox invoice for services provided April 1, 2023 through June 30, 2023	APP029-071
D	Ahuja & Clark invoice from for services provided April 1, 2023 through June 30, 2023	APP072-083
E	Veracity Forensic invoice from for services provided April 1, 2023 through June 30, 2023	APP084-091

EXHIBIT A

Timothy Barton Receivership Entities
Civil Action No.: 3:22-CV-2118-X
Standardized Fund Accounting Report
As of June 30, 2023

1	Beginning Balance - April 1, 2023:		\$ 478,598.36
2	Business Income		204,650.27
3	Funds Received		617,724.58
4	Interest/Dividend Income		4,490.01
5	Business Asset Liquidation		
6	Personal Asset Liquidation		
7	Third-Party Litigation Income		
8	Miscellaneous - Other		
9	Disbursements to Investors		
10	Disbursements for Receivership Operations:		899,653.55
	10a Disbursements to Receiver or Other Professionals	445,779.23	
	10b Business Asset and Operating Expenses	430,321.42	
	10c Personal Asset Expenses		
	10d Investment Expenses		
	10e Third-Party Litigation Expenses		
	10f Tax Administrator Fees and Bonds		
	10g Federal and State Tax Expenses	23,552.90	
11	Disbursements for Distribution Expenses Paid by the Fund		-
	11a Distribution Plan Development Expenses		
	11b Distribution Plan Implementation Expenses		
12	Disbursements to Court/Other		-
	12a Court Registry Investment System (CRIS) or other banking fees related to the Fund.		
	12b Federal income taxes		
13	Ending Balance - June 30, 2023		\$ 405,809.67
14	Ending Balance of Fund - Net Assets		405,809.67
	14a Cash & Cash Equivalents	405,809.67	
	14b Investments		
	14c Other Assets or Uncleared Funds		
15	Disbursements for Plan Administration Expenses Not Paid by the Fund		
	15a Plan Development Expenses Not Paid by the Fund		
	15b Plan Implementation Expenses Not Paid by the Fund		
	15c Tax Administrator Fees & Bonds Not Paid by the Fund		
16	Disbursements to Court/Other Not Paid by the Fund		
	16a Court Registry Investment System (CRIS) or other banking fees related to the Fund		
	16b Federal income taxes		

Timothy Barton Receivership Entities
Civil Action No.: 3:22-CV-2118-X
Standardized Fund Accounting Report
As of June 30, 2023

17 DC & State Tax Payments

18 No. of Claims

18a the number of claims received from investors during this reporting period

the number of claims received from investors as a result of all orders since the

18b inception of the Fund

19 No. of Claimants/Investors

19a the number of claimants/investors receiving distributions during the reporting period

the number of claimants/investors receiving distributions pursuant to all orders of

19b distribution since the inception of the Fund

EXHIBIT B



8111 Preston Road, Suite 300
 Dallas, Texas 75225
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BROWN FOX

INVOICE

Invoice # 36302
 Date: 08/14/2023

Barton Receivership

SEC v. Barton – Case Administration

Services

Date	Initials	Description	Hours	Rate	Client Total
04/03/2023	CCT	Organize correspondence file. [No charge]	0.80	\$0.00	\$0.00
04/04/2023	CCT	Cursory review of Receivership bank account statements; correspondence with accountants regarding same and need for SFAR; coordinate creation of Cash Accounting Summary.	0.70	\$385.00	\$269.50
04/04/2023	CCT	Begin drafting Fee Application for 1Q23. [No charge]	0.20	\$0.00	\$0.00
04/06/2023	CCT	Virtual meeting with accountants regarding status of receivership; continue reviewing and executing additional Form 56s for IRS from accountants.	0.70	\$385.00	\$269.50
04/06/2023	CCT	Meeting with Goldmark property manager to discuss landscaping and DHA payments. [No charge]	0.60	\$0.00	\$0.00
04/10/2023	CCT	Continue organizing correspondence file. [No charge]	0.60	\$0.00	\$0.00
04/10/2023	CCT	Correspondence with former employee regarding tax documents; review tax documents for purposes of same.	0.20	\$385.00	\$77.00
04/11/2023	CCT	Continue organizing Receivership correspondence file. [No charge]	0.60	\$0.00	\$0.00

04/11/2023	CCT	Review working drafts of cash accounting summaries for First Quarter of 2023; revise same; telephone conference with former employee regarding 2022 W2.	0.70	\$385.00	\$269.50
04/12/2023	CCT	Continue revising cash accounting summary; send same to accountants.	0.20	\$385.00	\$77.00
04/12/2023	CCT	Deliver payroll checks to Amerigold property manager; continue organizing correspondence file. [No charge]	0.90	\$0.00	\$0.00
04/13/2023	CCT	Correspondence with Veracity Forensics regarding additional laptop located at 2999 Turtle Creek.	0.20	\$385.00	\$77.00
04/13/2023	CCT	Meeting with Amerigold property manager regarding updated payroll checks. [No charge]	0.40	\$0.00	\$0.00
04/15/2023	CCT	Continue drafting Fee Application for 1Q23. [No charge]	2.10	\$0.00	\$0.00
04/16/2023	CCT	Continue organizing correspondence file. [No charge]	2.10	\$0.00	\$0.00
04/17/2023	CCT	Trip to Turtle Creek to check status of auctioneers' work. [No charge]	0.50	\$0.00	\$0.00
04/18/2023	CCT	Review working draft of motion to confirm litigation stay; provide comments to T. Wells; draft update to receivership website regarding motion to approve HNGH settlement.	0.40	\$385.00	\$154.00
04/19/2023	CCT	Continue drafting fee application for 1Q23. [No charge]	0.30	\$0.00	\$0.00
04/20/2023	CCT	Continue drafting 1Q23 fee application. [No charge]	1.10	\$0.00	\$0.00
04/20/2023	CCT	Continue drafting Cash Accounting Summary for 1Q23; review draft SFAR from accountants; reconcile with cash accounting summary; correspondence with accountants regarding same.	0.40	\$385.00	\$154.00
04/21/2023	CCT	Continue drafting Fee Application. [No charge]	0.40	\$0.00	\$0.00
04/23/2023	CCT	Continue drafting Fee Application for 1Q23; continue organizing correspondence file. [No charge]	1.10	\$0.00	\$0.00
04/24/2023	CCT	Continue drafting Fee Application for 1Q23. [No charge]	1.50	\$0.00	\$0.00

04/26/2023	CCT	Continue drafting Quarterly Status Report (1Q23).	3.90	\$385.00	\$1,501.50
04/27/2023	CCT	Continue drafting Quarterly Status Report (1Q23).	2.90	\$385.00	\$1,116.50
04/28/2023	CCT	Continue drafting Quarterly Status Report (1Q23).	2.10	\$385.00	\$808.50
04/28/2023	CCT	Meeting with Amerigold property manager to deliver payroll checks. [No charge]	0.60	\$385.00	\$231.00
04/30/2023	CCT	Finish drafting Quarterly Status Report (1Q23); draft update for Receivership website regarding same.	1.40	\$385.00	\$539.00
05/01/2023	CCT	Listen to Fifth Circuit oral arguments on appeal of Receivership Order.	0.90	\$385.00	\$346.50
05/05/2023	CCT	Correspondence with accountants regarding status of attempts to get tax returns from V. Palepu.	0.10	\$385.00	\$38.50
05/08/2023	CCT	Begin reviewing reply on proposed privilege protocol; begin revising same.	0.40	\$385.00	\$154.00
05/08/2023	CCT	Continue drafting Fee Application for 1Q23; coordinate redaction of privileged and other information from invoices. [No charge]	0.40	\$0.00	\$0.00
05/09/2023	CCT	Continue reviewing working draft of reply in support of privilege protocol; continue revising same.	1.80	\$385.00	\$693.00
05/09/2023	CCT	Continue drafting Fee Application for 1Q23; coordinate redaction of privileged and other information from invoices. [No charge]	0.50	\$0.00	\$0.00
05/10/2023	CCT	Continue drafting Fee Application for 1Q23; coordinate redaction of privileged and other information from invoices. [No charge]	0.90	\$0.00	\$0.00
05/11/2023	CCT	Continue drafting Fee Application for 1Q23; coordinate redaction of privileged and other information from invoices. [No charge]	2.10	\$0.00	\$0.00
05/11/2023	CCT	Time spent waiting for former Receivership Entities' accountant. [No charge]	1.80	\$0.00	\$0.00
05/11/2023	CCT	Meeting with Amerigold property manager regarding payroll. [No charge]	0.50	\$0.00	\$0.00
05/11/2023	CCT	Draft letter to former Receivership Entity accountant regarding refusal to provide access to tax return information; lengthy meeting with former accountant for Receivership Entities to gain	2.30	\$385.00	\$885.50

		access to Receivership Entities' tax records from 2018-2020; correspondence with accountants regarding same.			
05/12/2023	CCT	Review franchise tax extension requests; execute same.	0.60	\$385.00	\$231.00
05/12/2023	CCT	Continue drafting fee application for 1Q23; correspondence with M. Edney for purposes of certificate of conference. [No charge]	0.80	\$0.00	\$0.00
05/15/2023	CCT	Cursory review of order granting motion to compel; correspondence with C. Koons regarding same.	0.30	\$385.00	\$115.50
05/15/2023	CCT	Finish drafting fee application for 1Q23. [No charge]	0.60	\$0.00	\$0.00
05/18/2023	CCT	Meeting with Amerigold Property Manager to discuss status of compliance with fire safety inspection and to drop off fire extinguisher check. [No charge]	0.50	\$0.00	\$0.00
05/22/2023	CCT	Correspondence with Veracity Forensics regarding status of accessing Receivership Entities' email servers; telephone conference with potential Ridgeview creditor regarding claims process.	0.20	\$385.00	\$77.00
05/24/2023	CCT	Trip to Amerigold Suites to meet with property manager and deliver paychecks. [No charge]	0.60	\$0.00	\$0.00
05/29/2023	CCT	Correspondence with Veracity Forensics regarding status of accessing cloud data; begin reviewing declaration in opposition to motion to stay.	0.70	\$385.00	\$269.50
05/30/2023	CCT	Review revised working draft of Declaration; correspondence with C. Koonce regarding same.	0.40	\$385.00	\$154.00
06/14/2023	CCT	Correspondence with C. Koonce regarding [REDACTED].	0.10	\$385.00	\$38.50
06/14/2023	CCT	Correspondence with C. Koonce and T. Wells regarding [REDACTED].	0.10	\$385.00	\$38.50
06/16/2023	CCT	Correspondence with C. Koonce regarding [REDACTED].	0.10	\$385.00	\$38.50
06/22/2023	CCT	Deliver payroll checks to Amerigold; conference with Amerigold property manager regarding same and status of sale. [No charge]	0.60	\$0.00	\$0.00
06/29/2023	CCT	Lengthy meetings with C. Koonce [REDACTED].	2.60	\$200.00	\$520.00

[REDACTED]; virtual meeting with
 accountants [REDACTED]
 [REDACTED]; meetings with T. Wells [REDACTED]
 [REDACTED]. [Rate reduced for lengthy internal meetings]

06/29/2023	CCT	Meeting with Amerigold property manager and delivery of check. [No charge]	0.60	\$0.00	\$0.00
				Quantity Subtotal	48.1
				Services Subtotal	\$9,144.00

Expenses

Date	Description	Client Total
04/01/2023	1Q23 PACER service fees.	\$274.70
04/08/2023	Fee for keys made for 2999 Turtle Creek property.	\$8.05
04/10/2023	All My Sons Movers - moving and packing fees - 2999 Turtle Creek, Dallas, TX to Public Storage, Dallas, TX.	\$9,654.30
04/11/2023	Supplies expenses - labels for boxes to move 2999 Turtle Creek.	\$63.94
05/04/2023	Public Storage - May 2023.	\$274.40
05/11/2023	Postage sending receivership letters and orders to creditors, vendors and legal counsel.	\$73.50
05/12/2023	CMRRR fee to Texas Comptroller of Public Accounts for sending 2023 Texas Franchise Tax Extensions.	\$9.34
05/12/2023	Public Storage - June 2023.	\$392.00
06/06/2023	USPS Priority Mail to Small Business Administration.	\$28.75
06/14/2023	Postage submitting Motion for Final Decree to bankruptcy matrix.	\$164.16
06/14/2023	Fee for pulling Warranty Deed - Grayson County.	\$10.00
06/27/2023	FedEx overnight delivery fee of 7 copies of Amicus Curiae to 5th Circuit Court of Appeals.	\$88.37
06/27/2023	Round trip delivery fees to JP 5-2 filing Receiver's Notice to Stay in Cause No. JS2200220P. [Court computers were down. Stay could not be filed and was returned to Receiver.]	\$67.80
06/29/2023	Round trip delivery fees to JP 5-2 filing Receiver's Notice to Stay in Cause No. JS2200220P.	\$67.80

06/30/2023	2Q23 Texas Secretary of State entity searches for Barton team.	\$47.19
06/30/2023	2Q23 postal fees from The UPS Store for forwarding weekly mail.	\$231.49
06/30/2023	2Q23 PACER service fees for Barton team.	\$463.90
Expenses Subtotal		\$11,919.69
Subtotal		\$21,063.69

SEC v. Barton – Asset Analysis and Recovery

Date	Initials	Description	Hours	Rate	Client Total
04/03/2023	CCT	<p>Correspondence with counsel to potential purchaser of receivership property; review LOI on Venus properties; correspondence with auditor regarding D4IN bank statements; correspondence with Opelika contractor regarding status of retainage; meeting with A. Carrillo to discuss [REDACTED]; telephone conference [REDACTED]; continue reviewing [REDACTED]; correspondence with T. Huffman regarding missing signature; correspondence with Greystone regarding same; review summary from J. Mahaffey regarding [REDACTED]; continue reviewing B. Walker background documents and contracts.</p>	4.30	\$385.00	\$1,655.50
04/04/2023	CCT	<p>Telephone conference with J. Kane regarding status of settlement agreement; telephone conference with C. Koonce regarding same; review cursory research regarding same; correspondence with J. Kane regarding same; review correspondence from B. Walker regarding proposal; correspondence with potential auctioneer of artwork; review working draft of fourth amendment to sale of Frisco property; correspondence with R. Salem regarding same; correspondence with former employee regarding accounting group; correspondence with T. Huffman regarding missing signature on HUD forms; correspondence with potential purchaser of Venus properties; meeting with T. Wells to discuss [REDACTED]</p>	5.40	\$385.00	\$2,079.00

██████████; correspondence with counsel to Palisades regarding status of Frisco sale; telephone conference and correspondence with potential purchaser of Venus properties; telephone conference with potential purchaser of Hall and Gillespie properties; correspondence with counsel to buyer and title company regarding Amerigold sale; cursory review of SEC's brief on Rock Creek; review working drafts of amicus brief and motion for leave to file amicus brief in support of Rock Creek appeal; meeting and telephone conferences with counsel regarding ██████████; telephone conference with former Receivership Entity accountant.

04/05/2023	CCT	Correspondence with T. Huffman regarding HUD documents; correspondence with JAMS regarding upcoming mediation; telephone conference with B. Walker regarding proposal; telephone conference with M. Edney, T. Huffman, and C. Koonce regarding HUD signatures, personal property, tax returns, and other receivership items; draft letter to T. Huffman regarding HUD signatures; correspondence with counsel regarding same; review working draft of amicus brief and motion for leave; revise same; conference with counsel regarding same; meeting with former Receivership Entity accountant regarding tax returns; correspondence with accountants regarding same; telephone conference with J. Kane regarding draft settlement agreement; begin reviewing same; correspondence with A. Carrillo regarding same; correspondence and telephone conference with auditor regarding Ingleside audit; correspondence with accountants regarding same; correspondence with Greystone regarding same; correspondence with auditor regarding status of Opelika cost certification; correspondence with BC Contracting regarding liens on Opelika property; correspondence with Greystone regarding same; continue revising auction contracts; correspondence with potential auctioneers regarding same; call with M. Turner regarding potential agreement to oversee 2999 Turtle Creek.	5.30	\$385.00	\$2,040.50
04/06/2023	CCT	Continue reviewing draft settlement agreement from HN Capital; revise same; meeting with A. Carrillo to discuss same; correspondence with potential purchaser of Receivership properties; correspondence with auditor regarding status of Opelika audit; correspondence with T. Huffman	4.80	\$385.00	\$1,848.00

		regarding status of final signature for Opelika HUD document; correspondence with Greystone regarding Ingleside transaction; correspondence with auditor regarding same; telephone conference with A. Horton regarding status of Opelika cost certification; telephone conference and correspondence with potential purchaser of Venus properties; finish revising auction contracts; correspondence with auctioneers regarding same; begin reviewing working draft of motion for summary judgment related to HUD properties.			
04/07/2023	CCT	Correspondence with Greystone regarding initial deposit from Borrower; correspondence with S. Latham regarding information from seller; correspondence with Commonwealth title regarding same; review map of 2999 TC for plan for categorizing and removing documents; lengthy meeting with auctioneer at 2999 Turtle Creek; locate and segregate items identified as personal property by T. Barton with T. Wells; search for documents needed for Opelika cost certification; continue reviewing audit documents for D4IN; execute same.	5.90	\$385.00	\$2,271.50
04/10/2023	CCT	Continue extensive review and revisions to motion for summary judgment regarding HUD apartments; telephone conference and correspondence with J. Kane regarding status of settlement agreement; telephone conference and correspondence with potential mover of shelving and file cabinets before document movers; correspondence with auctioneer regarding status of inventory; correspondence with auditor regarding D4OP cost certification; correspondence with Rock Creek broker regarding extension of closing date.	3.50	\$385.00	\$1,347.50
04/11/2023	CCT	Continue reviewing working draft of motion for summary judgment against Southern Properties; continue revising same; lengthy telephone conference with C. Koonce to discuss same; correspondence with art auctioneer regarding executed agreement; telephone conference with Rock Creek purchaser regarding extension of closing date; telephone conference with broker regarding same; correspondence with potential interested purchaser of Turtle Creek property; prepare for call with auditor regarding Opelika cost certification; participate in same; begin reviewing working draft of mediation statement for Dixon mediation; correspondence with B. Walker;	5.30	\$385.00	\$2,040.50

correspondence with potential interested purchaser of 2999 Turtle Creek; correspondence with potential broker for Venus properties; correspondence with appraiser regarding status of various outstanding appraisals.

04/12/2023	CCT	Meeting with counsel to discuss [REDACTED]; telephone conferences with J. Kane regarding status of settlement agreement; telephone conference with V. Nambiar regarding same; review working draft of mediation statement for purposes of Dixon mediation; revise same; telephone conference with A. Carrillo regarding same; review working draft of motion to approve settlement with HNGH; revise same; telephone conference with A. Carrillo regarding same; continue reviewing working draft of motion for summary judgment; telephone conference and correspondence with counsel regarding same.	5.80	\$385.00	\$2,233.00
04/12/2023	CCT	Meetings at 2999 Turtle Creek and Receivership storage units with shelving and file cabinet mover in connection with vacating 2999 Turtle Creek. [meetings were sporadic between 9:45 and 6 pm; majority of time spent working on other matters]	3.30	\$200.00	\$660.00
04/13/2023	CCT	Correspondence with T. Huffman regarding signature on HUD retainage request for Opelika; correspondence with Greystone regarding same; correspondence with contractor regarding same; telephone conference with C. Koonce regarding [REDACTED]; continue reviewing working draft of motion for summary judgment; continue revising same; review declaration in support; revise same; correspondence with counsel to Palisades regarding status of Frisco Gate closing and 2999 Turtle Creek; correspondence with J. Kane regarding status of settlement agreement; correspondence with Receivership bank regarding Goldmark account; review additional documentation from B. Walker; telephone conference and lengthy correspondence with B. Walker regarding same; telephone conference with potential interested purchaser of 2999 Turtle Creek.	5.50	\$385.00	\$2,117.50
04/14/2023	CCT	Correspondence with counsel to subcontractor on Opelika property regarding removal of lien; correspondence with auctioneers regarding prints stored in garage; prepare for and participate in call	0.70	\$385.00	\$269.50

with purchaser of Frisco Gate and purchaser's counsel regarding working draft of Fourth Amendment to Purchase and Sale Agreement and needed revisions to same; correspondence with counsel to HNGH regarding finalized settlement and motion to approve same; correspondence with A. Carrillo regarding same.

04/16/2023	CCT	Correspondence with potential purchaser of Hall and Gillespie properties; review revised working draft of Fourth Amendment to Frisco Gate Purchase and Sale Agreement; correspondence with counsel to Petra regarding same; correspondence with M. Edney and T. Huffman regarding motion to approve HNGH settlement; correspondence with counsel to Opelika subcontractor regarding potential release of lien; draft update to Receivership Website regarding SPC Motion for Summary Judgment.	0.90	\$385.00	\$346.50
04/17/2023	CCT	Correspondence with Opelika auditor regarding status of cost certification; correspondence with Greystone regarding same; telephone conference and correspondence with counsel to Opelika subcontractor; correspondence with counsel to Palisades regarding HNGH settlement and forthcoming motion to approve; correspondence with SEC regarding same; meeting with C. Koonce to discuss [REDACTED]; correspondence with auctioneer regarding antiques at Rock Creek property; review final working draft of motion to approve settlement with HNGH; revise same; review Barton's "Notice" regarding offers to purchase Turtle Creek; review proposed order in support of same; revise same; coordinate filing of same; telephone conference with purchaser of Rock Creek residence regarding need to extend lease and closing date; meeting with counsel to discuss same; telephone conference with Rock Creek broker regarding same; telephone conference with A. Carrillo regarding [REDACTED].	5.30	\$385.00	\$2,040.50
04/18/2023	CCT	Correspondence with B. Walker; telephone conferences with A. Carrillo regarding [REDACTED]; cursory review of auction items; correspondence with auctioneer regarding same and items needing to be removed; prepare for call with Rock Creek purchaser regarding potential extension; participate in same; telephone conference with broker regarding same; meeting	2.20	\$385.00	\$847.00

		with T. Wells to discuss [REDACTED] [REDACTED].			
04/19/2023	CCT	Telephone conference with Mediator Hale and others regarding upcoming Dixon/Lumar mediation; correspondence with counsel to Petra regarding Fourth Amendment to Frisco Gate PSA; review same; execute same; correspondence with Amerigold broker regarding issues raised by title company; correspondence with Frisco lender regarding status of sale of Frisco Gate property; correspondence with title company on Amerigold property; correspondence with lender on Hall property regarding status of sale; correspondence with title company regarding extension of closing date on Rock Creek Property; correspondence with potential purchaser of Venus tracts; continue reviewing additional documents from B. Walker; lengthy correspondence with B. Walker regarding same.	3.20	\$385.00	\$1,232.00
04/20/2023	CCT	Correspondence with Amerigold title company; review updated list of items to be auctioned from Turtle Creek; telephone conference and correspondence with counsel regarding same; correspondence with counsel regarding [REDACTED]; correspondence with J. Hale regarding upcoming pre-mediation meeting; correspondence with interested purchasers of 2999 Turtle Creek; telephone conference with courier regarding package delivery for D4DS to Whittington.	1.30	\$385.00	\$500.50
04/21/2023	CCT	Telephone conference and correspondence with C. Koonce regarding [REDACTED] [REDACTED] review working draft of notice of auction of contents of 2999 Turtle Creek; telephone conference and correspondence with C. Koonce regarding same; review updated picture inventory of items to be included in auction; correspondence with counsel to Amerigold purchaser.	0.80	\$385.00	\$308.00
04/23/2023	CCT	Correspondence with auctioneer of artwork and antiques; correspondence with B. Walker regarding requests for information.	0.20	\$385.00	\$77.00
04/24/2023	CCT	Continued correspondence with B. Walker regarding responses to requests for information; telephone conference with counsel to Amerigold purchaser regarding request regarding potential	5.30	\$385.00	\$2,040.50

purchase price reduction; lengthy telephone conferences with broker regarding same; begin preparing for mediation; lengthy meeting with C. Koonce regarding same; telephone conference and correspondence with title company on Amerigold Property regarding old items on title report; telephone conference and correspondence with Opelika auditor regarding status of cost certification; meeting at Chase bank to get most recent bank statements for purposes of same; review receivership Canopy account.

04/25/2023	CCT	Finish preparing for Dixon mediation; attend same at JAMS; correspondence with Amerigold purchaser and counsel to Amerigold purchaser regarding requested price reduction; correspondence with broker regarding same. discussions with counsel regarding [REDACTED]; [REDACTED]; correspondence with auctioneer regarding same; correspondence with counsel to Palisades; correspondence with Amerigold property manager regarding status of rent payments and Dallas Housing Authority; correspondence with potential broker on TC Hall properties. [Time reduced from 9.6 total hours for time spent working on other matters during mediation]	8.70	\$385.00	\$3,349.50
04/27/2023	CCT	Correspondence with Frisco purchaser regarding executed amendment; correspondence with Frisco lender regarding same; correspondence with Palisades regarding same; correspondence with title company regarding same; correspondence with counsel regarding letters from IRS and Chase; review proposed amendment to Amerigold PSA; revise same; correspondence with counsel to Amerigold purchaser regarding same; correspondence with Amerigold broker regarding same; telephone conference with counsel regarding status of auction of contents of 2999 Turtle Creek.	1.10	\$385.00	\$423.50
04/28/2023	CCT	Review Barton's objection to sale of contents of Turtle Creek; telephone conference with C. Koonce regarding [REDACTED]; telephone conference with potential purchaser of Venus properties; telephone conferences and correspondence with auctioneer regarding same; telephone conference and correspondence with auctioneer; correspondence with J. Kane regarding same; research contact information for S. Baruch and counsel; telephone conference with former counsel	3.80	\$385.00	\$1,463.00

		to S. Baruch regarding same; telephone conference and correspondence with A. Baruch regarding same; telephone conference with Amerigold broker regarding due diligence period and closing date; telephone conference and correspondence with industry professional regarding Venus properties.			
04/30/2023	CCT	Correspondence with B. Walker regarding upcoming meeting. [No charge]	0.10	\$0.00	\$0.00
05/01/2023	CCT	Prepare for meeting with B. Walker; participate in lengthy meeting with B. Walker; correspondence with A. Baruch regarding prints stored in 2999 Turtle Creek garage; correspondence with Frisco lender regarding PSA, amendments, and due diligence period; correspondence with Lilian Homes regarding status of Ridgeview sale; telephone conference with L. McAfee regarding check to D4DS; meeting with C. Koonce to discuss [REDACTED]; [REDACTED]; correspondence with property tax consultant regarding protest of Amerigold tax hike; correspondence with JMJ's former accountant's office; review notices from insurer and City of Dallas regarding Gillespie Property; meeting with T. Wells to discuss same; correspondence with title company regarding Frisco property.	3.70	\$385.00	\$1,424.50
05/02/2023	CCT	Correspondence with counsel to Amerigold purchaser regarding changing title companies; correspondence with Republic Title regarding same; correspondence with broker regarding same; correspondence with potential interested purchaser of 4107 Rock Creek; correspondence with Amerigold property manager regarding rents received; telephone conference and correspondence with City of Venus regarding status of properties; continue reviewing working draft of response to Barton's objection on motion to sell contents of 2999 Turtle Creek; continue revising same; draft declaration in support of same; telephone conferences with C. Koonce regarding [REDACTED]; [REDACTED]; telephone conference with potential handyman to repair issues at Gillespie.	4.50	\$385.00	\$1,732.50
05/03/2023	CCT	Meeting with T. Wells to discuss [REDACTED]; [REDACTED]; draft declaration in support of response to Barton's objection regarding personal property; further revisions to response to objection;	2.50	\$385.00	\$962.50

telephone conference and correspondence with counsel regarding same; correspondence regarding new title company for Amerigold property; correspondence with Amerigold broker regarding same; telephone conference and correspondence with Amerigold lender regarding status of closing and title items needing to be cleaned up; correspondence with B. Walker regarding payments received from Broadview Holdings; review working draft of response to motion to strike; telephone conference with counsel regarding same; correspondence with Lillian Homes regarding status of negotiations with City of Venus; correspondence with C. Koonce and T. Wells regarding [REDACTED].

05/04/2023	CCT	Virtual meeting and correspondence with tax protest firm regarding Amerigold property.	0.40	\$385.00	\$154.00
05/05/2023	CCT	Telephone conference with consultant regarding Venus properties.	0.20	\$385.00	\$77.00
05/08/2023	CCT	Correspondence with T. Wells regarding [REDACTED]; correspondence with A. Carrillo regarding [REDACTED]; correspondence with potential purchaser of Hall property; telephone conference and correspondence with potential tax protestor for non-Amerigold properties; cursory research into same; correspondence with lender on Hall property; correspondence with potential broker regarding Hall property; telephone conference with D4OP auditor regarding status of cost certification; correspondence with Frisco purchaser regarding status of sale; correspondence with counsel to Amerigold purchaser regarding requested amendment and potential closing date; review Tamamoi's draft motion to intervene; telephone conference with counsel to Tamamoi regarding same; telephone conference and correspondence with potential electrician for replacing panels at Gillespie to maintain insurance coverage; correspondence with broker regarding same; correspondence with potential purchaser of Hall property.	3.40	\$385.00	\$1,309.00
05/09/2023	CCT	Correspondence with title company on Amerigold	1.50	\$385.00	\$577.50

sale; review proposed points for amendment to Amerigold PSA; correspondence with broker regarding same; correspondence with counsel regarding Barton's response to motion to approve HNGH settlement and timing for reply to same; begin reviewing [REDACTED]; telephone conference with J. Kane regarding same; correspondence with counsel regarding [REDACTED]; correspondence with potential interested purchaser of Turtle Creek property; correspondence with potential interested purchaser of Turtle Creek property; telephone conference with potential interested purchaser of TC Hall property; correspondence with broker on TC Hall property regarding prior offers received; telephone conference with T. Wells regarding [REDACTED].

05/10/2023	CCT	Telephone conference and correspondence with TC Hall broker regarding listing agreement and next steps; begin reviewing working draft of Dixon settlement; begin revising same; correspondence with counsel regarding same; telephone conference with lender on TC Hall property; correspondence with T. Wells regarding [REDACTED]; continue reviewing property tax services agreement, revise same; correspondence with tax protester regarding same; prepare for telephone conference with Rock Creek purchaser regarding longer term lease and increase in rent; participate in same; correspondence regarding same; telephone conference with purchaser of Frisco property regarding status of parking agreement and dispute with neighboring landowner.	2.90	\$385.00	\$1,116.50
05/10/2023	CCT	Meeting with buyer's broker on Frisco property. [No charge]	0.40	\$0.00	\$0.00
05/11/2023	CCT	Correspondence with counsel to Amerigold purchaser regarding status of amendment to PSA; correspondence with tax protest consultant regarding TC Hall and Frisco properties; correspondence with purchaser of Frisco property regarding same; correspondence with Amerigold title company regarding affidavit terminating the Goldmark condo association; correspondence with Amerigold broker regarding same; correspondence with Hall broker regarding appraisals; [REDACTED] review proposed second amendment to PSA; revise same; telephone	5.90	\$385.00	\$2,271.50

conference and correspondence with Amerigold broker regarding same; correspondence with counsel to Amerigold purchaser regarding same; correspondence with Rock Creek purchaser regarding longer-term lease; correspondence with J. Mahaffey regarding same; review background information regarding disputes in preparation for meeting 3820 Illinois; attend lengthy meeting with counsel to 3820 Illinois.

05/12/2023	CCT	Cursory review of Southern Properties' Reply in support of motion to strike summary judgment motion as to Ingleside and Opelika; correspondence with counsel regarding same; telephone conference [REDACTED]; telephone conference and correspondence with Amerigold broker regarding second amendment to PSA; correspondence with counsel to Amerigold purchaser regarding same; telephone conference with potential purchaser of DeSoto and Forney properties regarding status of Southern Properties dispute; correspondence with counsel to 3820 Illinois.	1.40	\$385.00	\$539.00
05/15/2023	CCT	Correspondence with auctioneer regarding continued delay on sale of contents of Turtle Creek office; meeting with C. Koonce to [REDACTED]; correspondence with T. Wells regarding [REDACTED]; correspondence with cost certification auditor regarding same; correspondence with counsel to Amerigold purchaser regarding change in title company; correspondence with Amerigold title company regarding same; correspondence with A. Carrillo regarding [REDACTED]; review order approving HNGH settlement; meeting with C. Koonce to discuss same; correspondence with J. Kane regarding same; correspondence with Vista Bank regarding funds held in Receivership account; correspondence with C. Koonce regarding [REDACTED].	2.80	\$385.00	\$1,078.00
05/16/2023	CCT	Correspondence with B. Walker regarding proposal; revise same; correspondence with City of Venus regarding status of Ridgeview sale; review working draft of lease with Rock Creek purchaser; revise same; telephone conference with J. Mahaffey regarding same; correspondence with	3.40	\$385.00	\$1,309.00

Rock Creek purchaser regarding same; correspondence with broker regarding same; meeting with C. Koonce to discuss [REDACTED]; telephone conference with J. Kane regarding order approving settlement with HNGH; correspondence with A. Carrillo regarding same; telephone conference and correspondence with potential interested purchaser of Venus properties; telephone conference with counsel to Dixon regarding settlement agreement; correspondence with Amerigold broker regarding estimated closing date; correspondence with counsel to Amerigold purchaser regarding same; correspondence with title company regarding same; cursory review of Barton's notices of appeal; telephone conference with C. Koonce regarding same.

05/17/2023	CCT	Correspondence with J. Kane regarding Barton appeal; correspondence with Amerigold broker regarding Barton's Notice of Appeal; correspondence with C. Koonce regarding same; correspondence with Amerigold purchaser regarding same; correspondence with potential purchaser of Venus Properties; continue reviewing fire inspection report for Amerigold; telephone conference with inspector regarding same; telephone conferences with potential contractor regarding same; telephone conferences with Amerigold property manager regarding same; review working draft of stipulation of dismissal of 2999 TC appeal; telephone conference with J. Kane regarding same.	2.40	\$385.00	\$924.00
05/18/2023	CCT	Correspondence with HNGH regarding access to Turtle Creek property; meeting with T. Wells to discuss [REDACTED]; telephone conference with Amerigold property manager regarding work needed in commercial kitchen; correspondence with contractor regarding same; correspondence with used equipment company regarding same; telephone conference with C. Koonce regarding [REDACTED]; correspondence with Amerigold purchaser regarding appeal; correspondence with title company regarding same; continue reviewing Hall BOV; correspondence with Amerigold property manager regarding fire extinguisher costs in light of Fire Inspector's audit; correspondence with	3.60	\$385.00	\$1,386.00

		Rock Creek purchaser regarding lease; correspondence with potential purchaser of Venus properties; review appraisal for Bacchus statue; correspondence with appraiser regarding same; correspondence with J. Kane regarding filings in appeal and adversary proceeding.			
05/19/2023	CCT	Meeting with T. Wells to discuss [REDACTED]; telephone conference with C. Koonce regarding [REDACTED]; correspondence with J. Kane regarding dismissal of appeal and adversary proceeding; correspondence with potential interested purchaser of Gillespie property; correspondence with potential interested purchaser of other receivership property; telephone conference with contractor from Venus properties; review Barton's responses to Court order; meeting with T. Wells to discuss same.	1.20	\$385.00	\$462.00
05/20/2023	CCT	Review working draft of motion to intervene and dismiss Amerigold appeal; revise same; correspondence with C. Koonce regarding same.	0.50	\$385.00	\$192.50
05/22/2023	CCT	Correspondence with tax protest advisor regarding offer from DCAD on Amerigold protest; correspondence with Amerigold broker regarding same; correspondence with Amerigold title company regarding appeal; telephone conference with C. Koonce regarding [REDACTED]; correspondence with Hall broker regarding status of listing; correspondence with B. Walker; review insurance renewal application for SF Rock Creek; correspondence with T. Wells regarding same; review working draft of Declaration in support of Emergency Motion to Intervene and to Dismiss the Amerigold appeal; cursory review of Venus appraisals; telephone conference with potential purchaser of Hall property; meeting with A. Carrillo to discuss [REDACTED]; correspondence with HN Capital regarding turnover of utilities; correspondence with Rock Creek purchaser regarding status of lease; review draft motion for final decree in 1999 TC bankruptcy; begin reviewing HUD auditor report; correspondence [REDACTED].	3.70	\$385.00	\$1,424.50
05/22/2023	CCT	Trip to 2999 Turtle Creek and then to Tesla to return leased vehicle. [No charge]	1.80	\$0.00	\$0.00

05/23/2023	CCT	Telephone conference and correspondence with Amerigold lender regarding expedited motion to intervene and dismiss; correspondence with Opelika contractor regarding retainage; correspondence with Greystone regarding same; meeting and correspondence with A. Carrillo to discuss [REDACTED]; begin checking auction list to confirm no pulled items included; correspondence with lender on Rock Creek property; telephone conference with potential purchaser of Gillespie property.	1.40	\$385.00	\$539.00
05/23/2023	CCT	Meeting [REDACTED].	2.10	\$385.00	\$808.50
05/24/2023	CCT	Telephone conference with Rock Creek broker regarding status of executed lease; correspondence with potential interested purchaser of Gillespie property; review proposed revisions to Dixon and Lumar settlement agreements; brief meeting with A. Carrillo to discuss same; prepare for meeting with Lilian Homes; participate in same; telephone conference [REDACTED]; telephone conference with Greystone regarding same.	1.80	\$385.00	\$693.00
05/25/2023	CCT	Correspondence with counsel to Amerigold regarding title company's inability to close pending appeal; prepare for telephone conference with Greystone regarding draft D4OP cost certification; participate in same; telephone conference and correspondence with T. Wells regarding [REDACTED]; additional correspondence with Greystone regarding potential resolution with SBA; correspondence with T. Wells regarding same; correspondence with counsel regarding [REDACTED]; correspondence with Amerigold purchaser regarding Fifth Circuit's denial of expedited motion to dismiss	1.40	\$385.00	\$539.00
05/26/2023	CCT	Correspondence with Amerigold purchaser regarding status of closing and sale; correspondence with auctioneer regarding items needing to be pulled from auction; correspondence with T. Wells regarding same.	0.30	\$385.00	\$115.50
05/30/2023	CCT	Telephone conference with J. Kane regarding status of settlement and Barton's motion to stay; telephone conference and correspondence with C. Koonce regarding same; correspondence with	1.10	\$385.00	\$423.50

		potential interested purchaser in Venus property; correspondence with City of Fort Worth regarding Marine Creek permit fees; cursory review of draft third amendment to Amerigold PSA; correspondence with J. Mahaffey regarding same.			
05/31/2023	CCT	Correspondence with T. Wells regarding [REDACTED]; correspondence with potential purchaser of Venus property; correspondence with C. Koonce regarding [REDACTED]; correspondence with broker for Hall property regarding status of offer to sell Hall property; correspondence with counsel to Amerigold purchaser; correspondence with C. Koonce regarding [REDACTED].	0.80	\$385.00	\$308.00
06/01/2023	CCT	Correspondence with counsel regarding auction; correspondence with auctioneer regarding same; correspondence with Veracity Forensics regarding Veracity's access to information; correspondence with broker on Hall property regarding status of listing; correspondence with counsel regarding [REDACTED]; correspondence with J. Mahaffey regarding [REDACTED]; correspondence with L. Osterman regarding same.	0.70	\$385.00	\$269.50
06/02/2023	CCT	Correspondence with T. Wells regarding [REDACTED]; correspondence with Opelika auditor regarding intent to pay back missing amounts; correspondence with potential purchaser of Gillespie property; review correspondence from Opelika contractor and Greystone regarding release of lien; correspondence with Amerigold property manager regarding payments from DHA; telephone conference and correspondence with auctioneer regarding status of 2999TC auction.	0.90	\$385.00	\$346.50
06/06/2023	CCT	Correspondence with lender on Amerigold regarding status of sale; telephone conference and correspondence with T. Wells regarding [REDACTED]; correspondence with C. Koonce regarding [REDACTED].	0.40	\$385.00	\$154.00
06/06/2023	CCT	Correspondence with T. Wells regarding [REDACTED]; correspondence with contractor from Amerigold property; review Barton's Response to	0.60	\$385.00	\$231.00

		Second Fee Application; correspondence with counsel regarding same; correspondence with counsel to Palisades regarding status of Frisco sale and 2999TC settlement.			
06/07/2023	CCT	Correspondence with T. Wells regarding [REDACTED]; review HN Capital's Motion for Leave to file Amicus Brief; review Barton's response to same.	0.40	\$385.00	\$154.00
06/08/2023	CCT	Review draft settlement agreement from counsel to Tamamoi; correspondence with counsel regarding same; telephone conferences and correspondence with C. Koonce regarding [REDACTED]; correspondence with Amerigold broker regarding status of sale.	1.10	\$385.00	\$423.50
06/09/2023	CCT	Review Barton's Reply in Support of Motion to Stay 2999 Turtle Creek settlement; telephone conference and correspondence with C. Koonce regarding same; correspondence with Hall Street broker.	0.40	\$385.00	\$154.00
06/12/2023	CCT	Correspondence with D. Crow regarding round tables at 2999 Turtle Creek; correspondence with counsel regarding same; review working draft of motion to close 2999TC bankruptcy case; correspondence with A. Carrillo regarding same; review working draft of motion to lift stay in Dixon and Lumar-related bankruptcies; correspondence with A. Carrillo regarding same; correspondence with counsel regarding [REDACTED]; correspondence with Rock Creek renter; review working draft of Tamamoi settlement agreement; revise same; correspondence with counsel regarding same; correspondence with B. Walker regarding status of Barton's motion to stay.	2.60	\$385.00	\$1,001.00
06/13/2023	CCT	Telephone conference with J. Carrier regarding status of listing of Hall property; telephone conference with C. Koonce regarding [REDACTED]; correspondence with interested purchaser of Venus properties.	0.90	\$385.00	\$346.50
06/14/2023	CCT	Review Response to Motion to Intervene; review declaration in support of same; correspondence with C. Koonce regarding same; correspondence with B. Walker; correspondence with D. Crow	0.60	\$385.00	\$231.00

		regarding dining table; correspondence with A. Carrillo regarding [REDACTED]			
06/14/2023	CCT	Correspondence with Amerigold purchaser regarding status of appeal.	0.20	\$385.00	\$77.00
06/16/2023	CCT	Correspondence with lender on Hall property regarding status of listing.	0.20	\$385.00	\$77.00
06/19/2023	CCT	Telephone conference with Rock Creek renter regarding status of rent payment; review order dismissing Rock Creek appeal; correspondence with counsel regarding same; correspondence with title company regarding same; telephone conference and correspondence with lender on Hall property.	1.00	\$385.00	\$385.00
06/20/2023	CCT	Meeting with C. Koonce to discuss [REDACTED]; telephone conference and correspondence with B. Walker regarding return of portions of escrowed funds; correspondence with Veracity regarding M365 data; review orders from Fifth Circuit panels in Barton appeals and FRAP 28; correspondence with Greystone and contractor regarding payment of additional amounts owed to contractor; correspondence with Amerigold purchaser regarding dismissal of Rock Creek appeal; telephone conference and correspondence with potential purchasers of Receivership Property; review release of lis pendens for 2999 Turtle Creek; correspondence with J. Kane regarding same; telephone conference with broker on Hall property; correspondence with Amerigold purchaser.	1.70	\$385.00	\$654.50
06/21/2023	CCT	Correspondence with J. Kane regarding release of lis pendens; review working draft of Tamamoi settlement and motion to approve same; revise same; review Fifth Circuit docket sheets for statuses of appeals and strategy moving forward for Amerigold sale; meeting with C. Koonce to discuss same.	1.00	\$385.00	\$385.00
06/22/2023	CCT	Review Barton's 28(j) letter disagreeing with panel decision dismissing Rock Creek appeal; correspondence with C. Koonce regarding same; telephone conference with J. Patton regarding status of Receivership; begin reviewing background information on Lost Creek litigation; telephone conferences with T. Wells regarding	1.50	\$385.00	\$577.50

same.

06/23/2023	CCT	Continue reviewing background information on Lost Creek litigation; prepare for call with G. Werley to discuss status of same; participate in same; meeting with T. Wells to discuss [REDACTED].	0.90	\$385.00	\$346.50
06/26/2023	CCT	Review correspondence from SBA regarding permission to file UCC-3; correspondence with D4OP auditor regarding same; correspondence with J. Mahaffey regarding same; meeting with C. Koonce to discuss [REDACTED]; telephone conference with Amerigold broker regarding status of appeal and sale.	0.60	\$385.00	\$231.00
06/27/2023	CCT	Telephone conferences with D4OP auditor regarding status of cost certification and curing findings; correspondence with potential purchaser of Ridgeview property; correspondence with Receivership Bank regarding new account for D4OP; begin reviewing working draft of reply in support of SPC Motion for Summary Judgment; continue reviewing SPC's MSJ response for purposes of same.	3.10	\$385.00	\$1,193.50
06/28/2023	CCT	Correspondence with BC Contracting regarding retainage claim by grading company; correspondence with D4OP auditor regarding final SBA release; meeting with T. Wells to discuss [REDACTED]; continue reviewing working draft of reply brief in support of SPC Motion for Summary Judgment; continue revising same; review opinion from Fifth Circuit; lengthy conference with counsel to discuss [REDACTED]; correspondence with accountants regarding same; correspondence with Hall brokers regarding same.	2.90	\$385.00	\$1,116.50
06/29/2023	CCT	Review working draft of motion to stay deadline to reply to SPC; revise same; correspondence with Amerigold purchaser regarding Opinion from Fifth Circuit; telephone conference and correspondence with J. Patton regarding status of Frisco sale; telephone conference with Rock Creek purchaser regarding status of Rock Creek sale.	0.70	\$385.00	\$269.50
06/30/2023	CCT	Correspondence with A. Carrillo regarding [REDACTED].	0.10	\$385.00	\$38.50
				Quantity Subtotal	160.3

Subtotal \$60,219.50

Expenses Total \$11,919.69

Hours Total 208.4

Services Total \$69,363.50

Total \$81,283.19

Current Statement payable upon receipt and due within 30 days.

Federal Tax ID 61-1764390

Wire Payments
Veritex Community Bank
17950 Preston Road, Suite 500
Dallas, TX 75252
ABA # 113024164 Account # 30081159

Check Payments
Brown Fox PLLC
8111 Preston Road, Suite 300
Dallas, TX 75225

Credit Card Payments <https://www.brownfoxlaw.com/payments>

Direct payment inquiries to the Account Services Department at accounting@brownfoxlaw.com

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 Dallas, Texas 75225
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BROWN FOX

INVOICE

Invoice # 36299
 Date: 08/11/2023

Barton Receivership

SEC v. Barton – Non-Receiver Activity: Asset Analysis and Recovery

Date	Initials	Description	Hours	Rate	Client Total
04/02/2023	JJM	Begin review of transaction documents between JMJ Development and Barton entities and Southern Properties Capital, focusing on the promissory notes, pledge and security agreements, HUD loan documents, assignment(s), and exercise notices for conversion options contained therein.	5.50	\$275.00	\$1,512.50
04/03/2023	JJM	Finish review of transaction documents between JMJ Development and Barton entities and Southern Properties Capital and deliver draft summary of analysis to C. Thomas and C. Koonce; phone call with C. Thomas and C. Koonce to review contractual provisions relevant to conversion process.	5.30	\$275.00	\$1,457.50
04/03/2023	CAC	Continue drafting mediation statement for Bear Creek Ranch dispute with Dixon and Lumar; conduct research regarding same; review documents produced in adversary proceeding regarding same.	2.40	\$300.00	\$720.00
04/03/2023	CCK	Review and revise motion for leave to file amicus brief and amicus brief related to Rock Creek; call [REDACTED]; call with J. Mahaffey regarding [REDACTED]; confer with C. Thomas regarding [REDACTED]; continue drafting SPC MSJ.	8.60	\$385.00	\$3,311.00
04/03/2023	TBW	Finish drafting Amicus Brief for Rock Creek	7.30	\$200.00	\$1,460.00

Appeal, research on due process in context of receivership (5.8); correspondence with M. Moore regarding bank statements for HUD audit (.4); correspondence with Move Solutions and Hot Shot Moving regarding Turtle Creek (.4); correspondence with Atmos Energy regarding addresses (.2); correspondence with Wallis Bank (.1); correspondence with B. Oliver regarding Opelika concerns (.4).

04/04/2023	CCK	Review correspondence from Hunton regarding pending motion to compel; confer with C. Thomas regarding [REDACTED]; research regarding [REDACTED]; respond to email from Hunton's general counsel; continue drafting SPC MSJ; call with C. Thomas regarding [REDACTED]; call with SEC to discuss Max appeal issues and amicus filing.	6.80	\$385.00	\$2,618.00
04/04/2023	CAC	Continue drafting mediation statement for Bear Creek Ranch dispute with Dixon and Lumar; conduct research regarding same; review documents produced in adversary proceeding regarding same; review docket filings in bankruptcy case regarding same.	2.10	\$300.00	\$630.00
04/04/2023	TBW	Correspondence with counsel for Louisiana National Bank regarding Hall Street updates (.1); correspondence with M. Taylor regarding Amerigold (.1); correspondence with first insurance funding regarding payment for Rock Creek (.3); begin substantial revisions to Amicus Brief for Rock Creek appeal (4.8).	5.30	\$200.00	\$1,060.00
04/05/2023	CCK	Review motion to compel in advance of call with general counsel for Hunton; call regarding same and discussion regarding payments and documents related to origin of payments made to Hunton; review correspondence regarding personal property recovery issues; call with C. Thomas and M. Edney regarding same; review consignment contract and edit same; further revisions to amicus brief regarding Rock Creek appeal; confer with C. Thomas regarding [REDACTED]; continue drafting MSJ regarding SPC, including research related to equitable treatment of competing claims in receivership administration.	8.20	\$385.00	\$3,157.00
04/05/2023	CAC	Continue drafting mediation statement for Bear Creek Ranch dispute with Dixon and Lumar;	5.20	\$300.00	\$1,560.00

		conduct research regarding same; review documents produced in adversary proceeding regarding same; review docket filings in bankruptcy case regarding same; review HNGH's draft 2999 Turtle Creek settlement agreement; add comments to same; correspondence with Receiver regarding comments to same.			
04/05/2023	TBW	Finish substantial revisions to Amicus Brief for Rock Creek appeal (2.9); revise Motion for Leave to file Amicus Brief (.6); review Federal Rules of Appellate Procedure for compliance (.5); correspondence with Wallis Bank (.2); continue revisions to working draft of amicus brief (.9); correspondence with J. Gitlin regarding First Development Co. of Ohio (.3); correspondence with D. Moore counsel for Landmark Grading regarding retainage application (.3); correspondence with M. Moore regarding HUD audit and review bank records for same (.6); correspondence with J. Silvasan regarding Amerigold operations (.4); call with potential buyer of Venus properties (.3); create cite regarding T. Barton control of SF Rock Creek (.6); begin reviewing and revising Goldmark cash accounting summary (.7).	8.30	\$200.00	\$1,660.00
04/06/2023	CAC	Continue drafting mediation statement for Bear Creek Ranch dispute with Dixon and Lumar; conduct research re same; review documents produced in adversary proceeding re same; review docket filings in bankruptcy case re same; meet with Receiver re [REDACTED]; [REDACTED]; correspondence with C. Koonce re same; review C. Koonce comments re same.	5.60	\$300.00	\$1,680.00
04/06/2023	SRL	Review production from Wallis Bank and update master chart accordingly; review productions from Texas Brand Bank for transfers between Broadview Holdings and Barton personal accounts; research regarding ownership/management of Broadview Holdings, LLC.	1.10	\$110.00	\$121.00
04/06/2023	CCK	Continue drafting MSJ regarding SPC and confer with T. Wells and C. Thomas regarding same; confer with assistant regarding preparation of appendix; review correspondence from Hunton regarding motion to compel; confer with team regarding same; review and revise draft settlement agreement with HN capital; review correspondence	6.60	\$385.00	\$2,541.00

		received from Hunton regarding motion to compel; confer with S. Latham regarding transfers between Barton's personal account and Broadview account and confer with C. Thomas regarding [REDACTED]; review email from 68th District Court regarding trial setting that the judge will not pull down or concede is stayed; confer with Hunton counsel regarding agreement to continue their deadline to respond; confer with C. Thomas regarding MSJ arguments and strategy.			
04/06/2023	TBW	Review receivership mail (.3); review and revise working drafts of Goldmark and Receivership account cash accounting summaries (2.3); review current Goldmark bills and create summary for Receiver (.5); correspondence with moving companies regarding quotes for moving 2999 Turtle Creek Documents (.7); participate in call with accountants regarding updates (.5); correspondence with M. Taylor regarding updated financials (.4); begin reviewing MSJ draft and adding information and citations (3.4); correspondence with Veracity Forensics regarding requested files (.1); correspondence with C. Koonce regarding [REDACTED] (.2).	8.40	\$200.00	\$1,680.00
04/07/2023	CAC	Continue drafting mediation statement for Bear Creek Ranch dispute with Dixon and Lumar; conduct research regarding same; review documents produced in adversary proceeding regarding same; review docket filings in bankruptcy case regarding same; draft revisions to 2999 Turtle Creek settlement; correspondence with Receiver and C. Koonce regarding same.	3.90	\$300.00	\$1,170.00
04/07/2023	SRL	Research Alabama property records regarding deed records for property owned by D4OP LLC.	0.50	\$110.00	\$55.00
04/07/2023	CCK	Continue drafting and revising MSJ regarding SPC issues; review message from the clerk of the 68th district court setting scheduling conference for stayed case and confer with T. Wells regarding [REDACTED].	5.70	\$385.00	\$2,194.50
04/07/2023	TBW	Begin revising Southern Properties' Motion for Summary Judgment (.8); correspondence with H. Spector regarding 3820 Illinois and motion to stay (.4); correspondence with S. Metzger regarding same (.2); correspondence with C. Koonce	4.20	\$200.00	\$840.00

		regarding [REDACTED] e (.2); miscellaneous organization and review of communications (.4); correspondence with J. Gitlin regarding First Development of Ohio (.1); correspondence with A. Hall regarding updates on properties (.1).			
04/08/2023	CAC	Continue drafting mediation statement for Bear Creek Ranch dispute with Dixon and Lumar; conduct research regarding same; review documents produced in adversary proceeding regarding same; review docket filings in bankruptcy case regarding same; revise motion to approve 2999 Turtle Creek settlement; conduct case law research in connection with same.	5.10	\$300.00	\$1,530.00
04/08/2023	CCK	Continue drafting SPC brief in support of MSJ; draft related motion; confer with T. Wells regarding [REDACTED].	3.50	\$385.00	\$1,347.50
04/10/2023	CAC	Finalize draft of Bear Creek Ranch mediation statement; send to Receiver for review; finalize draft of motion to approve 2999 Turtle Creek settlement; send to Receiver for review.	3.20	\$300.00	\$960.00
04/10/2023	CCK	Confer with T. Wells regarding [REDACTED]; continued research [REDACTED]; revise letter brief regarding same; begin drafting C. Thomas Declaration in support of MSJ; review and respond to emails from counsel related to stayed lawsuit in the 68th District Court; confer with T. Wells regarding [REDACTED]; call with J. Ansley regarding inquiries related to certain properties; review motion to compel documents related to attorney's fees and draft email responding to letter from Hunton's general counsel.	7.10	\$385.00	\$2,733.50
04/10/2023	TBW	Prepare for status conference regarding JMJ v. Tamamoi case (1.1); participate in same (.5); draft letter brief regarding federal court's authority to stay state court case in receivership and research regarding All Writs Act (1.9); correspondence with counsel for Tamamoi and 3820 Illinois (.4);	8.70	\$200.00	\$1,740.00

		correspondence with Vista Bank regarding approval for check and ordering additional checks (.2); prepare for second status conference (.2); participate in same (.4); confer with C. Koonce and Receiver regarding outcome of status conference (.2); pay Goldmark TXU bill (.1); correspondence with counsel regarding D4OP lawsuit in Alabama (.5); correspondence with Walker Dunlop regarding Amerigold (.2); miscellaneous correspondence regarding landscaping, moving documents, storage units, and Amerigold Suites (.7); correspondence with moving companies for Turtle Creek (.3); correspondence with J. Silvasan regarding repairs (.2); review and revise Southern properties Motion for Summary Judgment (1.8).			
04/11/2023	CAC	Correspondence with counsel to Dixon regarding materials required for mediation.	0.10	\$300.00	\$30.00
04/11/2023	CCK	Continue work on MSJ, with close of review of reams of contract documents and HUD regulations, adding authorities, research regarding same, conferring with C. Thomas regarding [REDACTED]; review draft appendix table of contents, comparing same to various contract documents, and confer with assistant regarding missing documents; review order from the Fifth Circuit requiring response to our motion for leave to file amicus.	9.10	\$385.00	\$3,503.50
04/11/2023	TBW	Correspondence with counsel for First Development of Ohio (.2); correspondence with counsel for Stream Energy (.1); correspondence with counsel for Texas Brand Bank (.2); review pledge agreements and add details to Southern Properties motion for summary judgment (2.4); review and revise motion for summary judgment (1.4); review receiver's status report for details regarding Southern Properties loan amounts and add to motion for summary judgment (.3); correspondence with auctioneer regarding scheduling (.1).	4.70	\$200.00	\$940.00
04/12/2023	CAC	Implement Receiver's revisions to draft motion to approve settlement with HNGH regarding 2999 Turtle Creek; call with Receiver regarding same; correspondence with HNGH counsel J. Kane regarding same; implement Receiver's revisions to draft mediation statement regarding Bear Creek Ranch dispute with Dixon and Lumar; call with	5.10	\$300.00	\$1,530.00

Receiver regarding same.					
04/12/2023	CCK	Continue review and edits to MSJ, supporting declaration, and appendix, reviewing additional documents, and adding or extracting from supporting appendix; reviewing additional facts and questions regarding same added by T. Wells; confer with C. Thomas regarding [REDACTED] [REDACTED] review email from accountants to T. Wells and research regarding assertions in same; review Barton's appellate brief filed in DLP appeal and review briefs filed after the record was prepared that relate to the issues in that appeal; confer with T. Wells regarding [REDACTED] [REDACTED]; continue edits to MSJ documents, including adding cites to appendix.	7.90	\$385.00	\$3,041.50
04/12/2023	SRL	Review latest Capital One production and update master bank chart.	0.70	\$110.00	\$77.00
04/12/2023	TBW	Locate documents for JMJD4 (.3); correspondence with C. Koonce regarding same (.2); correspondence with counsel for Third Coast Bank regarding plane (.2); correspondence with J. Silvasan regarding payroll for Amerigold (.1); correspondence with K. O'Rourke regarding cutting checks for same (.1); correspondence with Vista Bank regarding additional checks (.1); review email from A. Morani (.2); confer with C. Koonce and Receiver regarding response (.1); review and revise Southern Properties MSJ specifically the pledged equity discussion and review company agreements of associated entities (2.4).	3.70	\$200.00	\$740.00
04/13/2023	CAC	Finalize motion to approve settlement with HNGH for 2999 Turtle Creek; send to Receiver for review.	1.40	\$300.00	\$420.00
04/13/2023	SRL	Continue to review and organize bank productions and update master bank chart accordingly.	1.60	\$110.00	\$176.00
04/13/2023	CCK	Continue drafting and editing brief, exhibits, supporting evidence and appendixes and adding references to all supporting evidence in the Thomas Dec and the Brief (78 exhibits, 1000+ pages of evidence); review response from Barton regarding motion for leave to file amicus and order denying motion for same.	7.90	\$385.00	\$3,041.50
04/13/2023	TBW	Correspondence with counsel for Texas Brand	2.30	\$200.00	\$460.00

		Bank (.3); confer with Receiver regarding same (.1); correspondence with Vista Bank regarding additional checks (.1); review Fifth Circuit order regarding motion to file amicus brief (.2); correspondence with S. Latham regarding bank records (.2); review and revise Southern Properties motion for summary judgment (1.4).			
04/14/2023	CCK	Review and revise draft motion to approve settlement agreement with HN Capital.	0.50	\$385.00	\$192.50
04/14/2023	CAC	Incorporate revisions to draft motion to approve HNGH settlement regarding 2999 Turtle Creek; draft proposed order to draft motion; send same to Receiver for review and approval.	1.50	\$300.00	\$450.00
04/17/2023	CAC	Continue to draft mediation statement for Bear Creek Ranch dispute with Dixon and Lumar; conduct case law research and review of document production regarding same; finalize motion to approve settlement with HNGH regarding 2999 Turtle Creek.	5.80	\$300.00	\$1,740.00
04/17/2023	SRL	Review SEC document production for bank statements.	1.30	\$110.00	\$143.00
04/17/2023	TBW	Correspondence with J. Silvasan regarding update on plumbing issue at Amerigold Suites and issues with computer (.6); draft motion to confirm litigation stay (2.7); draft proposed order for same (.4); correspondence with C. Koonce regarding same (.2); correspondence with Receiver regarding [REDACTED] (.3); correspondence with counsel to confer about motion to confirm litigation stay (.4); review Parker County appraisal website to determine properties encompassed in Lumar certifications (.3); correspondence with A. Carrillo regarding same (.1); correspondence with landscaper for Gillespie and Hall street properties (.2); correspondence with counsel for Lumar Land regarding new certifications (.2); confer with A. Carrillo and Receiver regarding same (.2).	6.60	\$200.00	\$1,320.00
04/18/2023	CCK	Review and revise Lumar mediation statement and review supporting exhibits; brief research regarding likely affirmative defenses to our claims against Lumar and Dixon; review invoice from attorney/creditor and respond to email from same regarding claims process; further revisions to motion to confirm litigation stay and confer with T.	2.60	\$385.00	\$1,001.00

		Wells regarding same; call with C. Thomas and A. Carrillo to discuss mediation strategy and begin review of documents received from Dixon and Lumar regarding same; call with the SEC's appellate counsel regarding DLP appeal.			
04/18/2023	SRL	Review Veritex bank production received from SEC.	3.90	\$110.00	\$429.00
04/18/2023	TBW	Correspondence with M. Taylor regarding Amerigold due diligence requests (.3); correspondence with counsel for Pioneer Finance (.1); correspondence with counsel for Lumar Land regarding certifications (.3); call with TXU to obtain contract for Goldmark (.5); research regarding state court's recognition of federal court's authority and effect of violating automatic stay in bankruptcy context (1.3); pay 2999 Turtle Creek TXU bill (.2); revise motion to confirm litigation stay (.7); review and revise cash accounting summaries (.8); lengthy meeting with Receiver to discuss [REDACTED] [REDACTED] (.8); correspondence with K. O'Rourke regarding filing motion to confirm litigation stay (.3).	5.30	\$200.00	\$1,060.00
04/18/2023	CAC	Finalize mediation statement for Bear Creek Ranch dispute; call with C. Koonce and Receiver regarding same; circulate same and exhibits to mediator.	2.50	\$300.00	\$750.00
04/19/2023	CCK	Continue review of relevant documents and elements of claims and defenses related to mediation with Dixon and Lumar; participate in pre-mediation call with mediator regarding same and call with C. Thomas regarding same; review emails from lender on Frisco Property and confer with C. Thomas regarding same; review email from counsel on Tammoni lawsuit regarding motion to intervene and confer with T. Wells regarding same.	3.40	\$385.00	\$1,309.00
04/19/2023	SRL	Update Master Bank Chart as to Veritex bank statements reviewed in SEC Production.	1.70	\$110.00	\$187.00
04/19/2023	TBW	Review records for documents pertaining to Bear Creek Ranch transactions (1.6); correspondence with counsel for Tamamoi and 3820 Illinois (.4); correspondence with counsel for Pioneer Finance regarding updates (.2); correspondence with C.	2.40	\$200.00	\$480.00

Koonce regarding same (.1); correspondence with Receiver regarding mail (.1).

04/20/2023	CCK	<p>Review emails between C. Thomas and creditor/lender on Frisco property regarding status and taxes; confer with T. Wells regarding responding to threats of motion to intervene and demand to resolve creditor/lender claims; call with C. Thomas to discuss personal property issue; draft email to Defendants' counsel regarding same; review emails between C. Thomas and B. Walker regarding dispute to funds in escrow; review Barton's Reply brief in Rock Creek appeal; review lengthy email from V. Barton regarding personal property issues; confer with C. Thomas regarding same and review photos extracted from auction site by assistant; draft response to V. Barton; confer with C. Thomas regarding [REDACTED]; [REDACTED]; continue research regarding [REDACTED].</p>	5.90	\$385.00	\$2,271.50
04/21/2023	CCK	<p>Review template declaration for use by V. Barton regarding items she contends are her personal property and should not be included in auction and correspondence with V. Barton regarding same; call with C. Thomas regarding [REDACTED]; [REDACTED] call with Judge Hale to discuss mediation regarding Lumar/Dixon issues; review email from counsel for Barton regarding auction of Turtle Creek contents; confer with C. Thomas regarding same; review admin order and draft Notice of Sale; and supporting declaration; further email exchanges with counsel for Barton.</p>	3.90	\$385.00	\$1,501.50
04/24/2023	CCK	<p>Confer with C. Thomas regarding [REDACTED]; [REDACTED]; call with counsel for SPC regarding mutual extensions; further conference with C. Thomas regarding [REDACTED]; [REDACTED]; confer with T. Wells regarding [REDACTED]; continued review of documents related to Dixon/Lumar mediation; review summary of litigation to evaluate use of</p>	2.70	\$385.00	\$1,039.50

		same for mediation; review M. Barton declaration and T. Barton email regarding personal property included in the auction; review email from counsel for SPC regarding motion to strike and confer with C. Thomas regarding [REDACTED]; review motion and order related to summary proceeding; respond to email from SPC's counsel; review motion to strike portions of summary judgment motion regarding Opelika and Ingleside.			
04/25/2023	CCK	Attend mediation regarding Dixon and Lumar; review emails from counsel for SPC regarding agreed motion to extend deadlines and draft motion and order regarding same; review personal property lists received from M. Barton and T. Barton and work through response to same with C. Thomas; respond to email from V. Barton regarding same; review order for Barton to respond to Receiver's privilege protocol; review SPC's motion to strike portions of MSJ and begin drafting response to same.	8.70	\$385.00	\$3,349.50
04/25/2023	TBW	Prepare for and participate in mediation with Dixon Water Foundation and Lumar Land. [No charge]	8.60	\$0.00	\$0.00
04/25/2023	TBW	Correspondence with counsel for First Development of Ohio (.2); respond to email from A. Morani (.4); review bank records regarding source of payments to Dixon (.4); review bank records for source of payments to First Development of Ohio (.4); confer with C. Koonce and Receiver regarding personal property (.5).	1.90	\$200.00	\$380.00
04/26/2023	CCK	Review SPC's edits to motion for extension and review C. Thomas's edits to same; revise and finalize; review order denying motion to stay DLP settlement; draft response to email from Hunton regarding motion to compel and confer with C. Thomas regarding same; confer with C. Thomas regarding [REDACTED]; review order confirming application of litigation stay and confer with T. Wells regarding procedure for providing same to 68th district court; review Hunton response and further communications regarding same; confer with T. Wells regarding [REDACTED]; review and revise notice of order enforcing stay; confer with T. Wells regarding [REDACTED].	1.70	\$385.00	\$654.50

04/26/2023	TBW	Review orders regarding motion to confirm litigation stay and motion to stay pending appeal (.3); correspondence with C. Koonce and Receiver regarding [REDACTED] (.2); correspondence with Sunridge Management regarding Parc at Ingleside notice (.2); compile Goldmark payroll and correspondence with K. O'Rourke regarding same (.5); review bank statements to trace earnest money and extension payments made by Titan Investments (.8); correspondence with Title Partners regarding Titan Investments file (.5); correspondence with J. Silvasan regarding miscellaneous Amerigold issues (.3); correspondence with counsel for First Development Company of Ohio (.3); correspondence with counsel for Carnegie homes regarding mail (.3); draft notice of confirmation of litigation stay for JMJ v. Tamamoi case (.9); review Dallas County local rules regarding same (.3); correspondence with counsel for Lumar Land regarding settlement agreement and new certifications (.4); review certifications and prepare for Receiver to sign (.6); confer with receiver regarding same (.2); correspondence with potential property buyer (.2); correspondence with counsel for Tamamoi and 3820 Illinois regarding order regarding litigation stay (.1); review A. Morani response email and attached documents (.5); review mail (.4); correspondence with accountants and review bank records in response to question from same (.5); respond to email from Landmark grading regarding payment status (.2).	7.70	\$200.00	\$1,540.00
04/27/2023	CCK	Review and revise notice of withdrawal regarding motion to compel documents; continue drafting response to motion to strike filed by SPC; brief review of objection to notice of auction and request for preliminary injunction and confer with C. Thomas regarding same.	1.20	\$385.00	\$462.00
04/27/2023	TBW	Correspondence with C. Koonce regarding questions about notices received in mail (.2); draft Notice of Motion to Withdraw Motion to Compel (1.7); correspondence with C. Koonce and Receiver regarding same (.2); correspondence with K. O'Rourke regarding filing Notice (.1); correspondence with C. Mathis regarding Venus land lease (.4); complete property tax ag exemption form for Venus property (.7); review Barton objection to auction (.4).	3.70	\$200.00	\$740.00

04/27/2023	TBW	Travel to Elite Jet Solutions to survey airplane and return to office (3.2). [Rate reduced to paralegal rate]	3.20	\$110.00	\$352.00
04/28/2023	CCK	Continue review of Objection to Notice of auction; confer with C. Thomas regarding [REDACTED]; begin drafting response.	3.80	\$385.00	\$1,463.00
04/28/2023	TBW	Draft paragraph regarding status of airplane for Receiver's report (.5); create spreadsheet for Rock Creek 2023 principal and interest payments (.8); correspondence with Receiver regarding [REDACTED] (.1); pay same (.2); call with B. Oliver regarding Parc at Opelika drainage issues (.4); correspondence with K. O'Rourke regarding claims list (.1); correspondence with J. Silvasan regarding Spectrum notice (.1).	2.10	\$200.00	\$420.00
04/30/2023	CCK	Continue drafting Response to Objection regarding Notice of Auction.	3.00	\$385.00	\$1,155.00
05/01/2023	CCK	Continue drafting Response to Objection regarding Notice of Auction; review and edit supporting exhibits and Appendix for same; confer with T. Wells and C. Thomas regarding same; listen to oral arguments regarding appeal of order appointing receiver and confer with C. Thomas regarding [REDACTED]; continue drafting order regarding notice of auction; continue drafting Response to SPC's motion to strike.	8.40	\$385.00	\$3,234.00
05/01/2023	TBW	Correspondence with All My Sons moving regarding final bill (.3); review files for prior correspondence regarding personal property at receivership properties (.3); correspondence with Sunridge Property Management regarding check received in mail (.2); correspondence with Sendera Title regarding escrow funds for DJD Land Partners (.4); correspondence with Receiver regarding [REDACTED] (.2); begin revising response auction objection (.9); correspondence with Hide and Seek Recovery regarding coordinating Tesla retrieval (.3); review mail (.4); miscellaneous correspondence regarding notice from City of Dallas regarding Gillespie Villas (.3); review notice form Reveal Insurance (.1); correspondence with M. Gill regarding Gillespie Villas (.2).	3.60	\$200.00	\$720.00
05/02/2023	CCK	Continue drafting response to Objection regarding	1.40	\$385.00	\$539.00

		auction of Office Contents and response to Motion to Strike; call with SEC; confer with C. Thomas regarding [REDACTED].			
05/02/2023	SRL	Review Chase productions for check images related to D4IN account ending 0082.	0.90	\$110.00	\$99.00
05/02/2023	TBW	Continue reviewing and revising response to auction objection (2.6); review bank production files to locate records for receivership accountants (.6); correspondence with Chase Bank regarding additional requests (.3); correspondence with M. Gill regarding insurance inspection report (.2); review additional certifications from Lumar Land (.3); call with Cushman Wakefield regarding updates on property (.2); correspondence with Receiver and E. Maldonado regarding repairs to 3600 Gillespie (.4); inspect Gillespie property [no charge for travel time] (.3); correspondence with landscaper (.2); miscellaneous communications with Receiver (.3).	5.40	\$200.00	\$1,080.00
05/03/2023	CCK	Review and respond to email from former MJM counsel regarding trial setting for stayed case; call with C. Thomas regarding [REDACTED]; edits to response, supporting declaration, and related order, including review and comparison of items listed in Barton's email and items already exempted by V. Barton and M. Barton; confer with C. Thomas regarding [REDACTED]; confer with counsel regarding SPC regarding alternate motion for order, nunc pro tunc, and draft order regarding same; email exchange with V. Barton and counsel for M. Barton regarding their retrieval of their personal items; review email from counsel from lender regarding Ridgeview property; confer with C. Thomas regarding [REDACTED]; review summary of work accountants will perform and budget for same; confer with T. Wells regarding bank request to close an account on which fees have rendered the balance negative.	5.50	\$385.00	\$2,117.50
05/03/2023	TBW	Correspondence with counsel for Lumar Land regarding revised certifications and partial release (.4); review revised certifications (.6); confer with Receiver regarding same (.2); correspondence with counsel for Third Coast Bank regarding JMJA airplane (.8); review Broadview bank account records to find checks related to B. Walker (.4);	5.60	\$200.00	\$1,120.00

		correspondence with Public Storage regarding bill payment (.4); review American Benefit Life Insurance website and documents related to Ridgeview Addition (1.9); correspondence with Receiver and C. Koonce regarding same (.4); correspondence with E. Maldonado regarding repairs to Gillespie (.2); correspondence with counsel for Texas Brand Bank regarding dormant accounts (.3).			
05/04/2023	CCK	Review C. Thomas's email regarding [REDACTED] and T. Well's research regarding [REDACTED]; research regarding motions to lift stay in receivership for secured lender to proceed; draft email to B. Norris regarding same; review Barton's response to proposed privilege protocol, research regarding authorities cited and draft detailed outline for Reply.	2.60	\$385.00	\$1,001.00
05/04/2023	SRL	Begin review of bank productions and create chart of same to determine production deficiencies.	1.60	\$110.00	\$176.00
05/04/2023	TBW	Correspondence with public storage regarding account access (.4); gather updated financials for Goldmark Hospitality and send to C. Thomas (.5); correspondence with J. Silvasan regarding Dallas Housing Authority (.2); correspondence with All My Sons moving regarding refund (.3); review additional certifications from Lumar Land (.9); correspondence with counsel for Lumar regarding same (.3); confer with C. Thomas regarding certifications (.2); correspondence with accountants regarding bank statements for Parc at Ingleside (.2); review bank production for missing statements (.4); prepare letters to creditors notifying them of receivership (1.4); correspondence with Tesla to schedule vehicle return (.3); correspondence with E. Maldonado regarding repairs to Gillespie (.3); review response from Universal Solar regarding Amerigold (.2); correspondence with K. O' Rourke regarding payment for same (.1); correspondence with M. Gill regarding question about insurance report (.3); review Barton's response to proposed privilege protocol (.6).	6.60	\$200.00	\$1,320.00
05/05/2023	CCK	Begin drafting Reply in support of privilege protocol.	2.70	\$385.00	\$1,039.50
05/05/2023	SRL	Continue review of bank productions to determine	1.20	\$110.00	\$132.00

deficiencies in document productions.

05/08/2023	SRL	Continue to review bank document productions for deficiencies and to prepare chart of same.	1.20	\$110.00	\$132.00
05/08/2023	TBW	Review bill and coordinate payment for Impact property solutions (.3); correspondence with J. Silvasan regarding same (.2); correspondence with S. Ramer regarding personal property on auction website (.4); confer with C. Thomas regarding [REDACTED] (.2); correspondence with J. Dillion regarding status of Rock Creek sale (.2); correspondence with counsel for Lumar Land and Dixon regarding status of agreement (.3); finish revising working draft of privilege reply (4.8); review SBA loan list (.2); coordinate payroll for Goldmark (.3); review certificate of conference and motion from Tamamoi and 3820 Illinois (.4); confer with C. Thomas and C. Koonce regarding same (.2); review revised partial release from Lumar Land (.4); correspondence with M. Gill regarding insurance inspection (.2); correspondence with electrician regarding Gillespie street electrical panels (.3); correspondence with K. Bernstein regarding motion to intervene (.3); correspondence with K. O'Rourke regarding Chase bank (.2).	8.90	\$200.00	\$1,780.00
05/09/2023	TBW	Review Barton's response to motion to approve Turtle Creek settlement (.7); correspondence with A. Hall regarding updates on properties (.2); correspondence with court clerk regarding stay of JMJ v. Tamamoi case (.3); prepare proposed order staying same (.5); coordinate filing same (.2); review final draft of privilege reply (1.4); coordinate filing same (.2); correspondence with M. Gill regarding Gillespie insurance (.4); confer with C. Thomas regarding same (.2); miscellaneous communications regarding receivership (.4); correspondence with SBA regarding outstanding loans (.8); confer with C. Thomas regarding [REDACTED] (.2); correspondence with Lumar regarding signed partial release (.2); pay Turtle Creek TXU bill (.2); correspondence with Sunridge management regarding check (.2).	6.10	\$200.00	\$1,220.00
05/11/2023	TBW	Correspondence with M. Taylor regarding receivership properties (.1); correspondence with Vista bank [REDACTED] (.6); confer with C. Thomas regarding same (.2); coordinate paying Ridgeview	4.60	\$200.00	\$920.00

citation to city of Venus (.2); prepare for meeting with counsel for Tamamoi and 3820 Illinois (.8); participate in same (1.9); correspondence with counsel for D. Morrenoff regarding status of receivership (.4); correspondence with JLL regarding receivership properties (.2); review Rock Creek insurance renewal (.2).

05/12/2023	JJM	Draft Residential Lease Agreement for 4107 Rock Creek Drive and deliver to C. Thomas.	1.90	\$275.00	\$522.50
05/12/2023	CAC	Begin review of T. Barton's response to Receiver's motion to approve settlement with HNGH in connection with preparation to draft a reply to same.	0.40	\$300.00	\$120.00
05/12/2023	TBW	Review Southern Properties Capital's reply to motion to strike motion for summary judgment (.3); review list of title company transactions involving receivership entities (.5); correspondence with Sunridge property management about depositing check (.2); correspondence with Chase bank regarding missing account statements (.2); review storage charges and coordinate payment (.2); review letter from insurance carrier regarding incident at Amerigold (.3).	1.70	\$200.00	\$340.00
05/15/2023	CCK	Review SPC's Reply in support of motion to strike and court's order regarding same; review Barton's Response to Motion to Approve HN Settlement; confer with C. Thomas regarding [REDACTED] [REDACTED] review lengthy orders granting motion to compel and motion to approve HN Capital Settlement; confer with C Thomas regarding [REDACTED].	0.70	\$385.00	\$269.50
05/15/2023	CAC	Review T. Barton's opposition to the Receiver's motion to approve the settlement with HNGH for 2999 Turtle Creek; draft reply in support of the Receiver's motion; listen to audio recording of oral argument of SEC v. Barton before the Fifth Circuit in connection with same.	1.10	\$300.00	\$330.00
05/15/2023	TBW	Correspondence with counsel for SBA regarding status of loan documents (.6); correspondence with J. Silvasan regarding Amerigold payment issues (.4); correspondence with S. Lankford regarding Rock Creek insurance renewal (.5); confer with C.	4.80	\$200.00	\$960.00

Thomas regarding same (.2); review SBA loan documents (.9); coordinate creation of index for loan documents (.1); correspondence with Tesla regarding return of vehicle (.3); correspondence with Counsel for Dixon regarding settlement agreement (.5); confer with C. Thomas regarding same (.1); correspondence with counsel for Lumar (.2); correspondence with city of Venus verifying payment for Ridgeview citation (.2); correspondence with Chase bank regarding document production (.2); review order granting motion to compel (.5); review order granting motion to approve HNGH settlement (.1).

05/16/2023	CCK	Review notices of interlocutory appeal; telephone conference with C. Thomas regarding same.	0.30	\$385.00	\$115.50
05/16/2023	TBW	Correspondence with counsel for SBA regarding missing loan documents (.2); review new files from same (.1); confer with C. Koonce, A. Carrillo, and C. Thomas regarding conference call with counsel for Dixon (.2); correspondence with Dixon regarding settlement agreement and conference call (.2); participate in conference call with same (.4); review fire inspection report from Amerigold Suites (.4); correspondence with J. Silvasan regarding same (.2); correspondence with counsel for Third Coast bank regarding plane (.2); correspondence with counsel for Pate Jones regarding updates (.2); correspondence with Hide and Seek Recovery regarding retrieval of Tesla (.2).	2.30	\$200.00	\$460.00
05/17/2023	CAC	Draft stipulation of voluntary dismissal of appeal in 2999TC Acquisitions' bankruptcy case; conduct research of [REDACTED]; send same to Receiver for review and signature.	1.20	\$300.00	\$360.00
05/17/2023	TBW	Confer with Receiver and co counsel regarding Lumar (.2); correspondence with movers for additional Turtle Creek documents (.2); correspondence with J. Silvasan regarding Amerigold air conditioning repairs (.2).	0.60	\$200.00	\$120.00
05/18/2023	CCK	Confer with C. Thomas regarding [REDACTED]; call [REDACTED]; call with C. Thomas to discuss [REDACTED]; call with [REDACTED]; call with SEC to discuss questions about the record in [REDACTED]	6.20	\$385.00	\$2,387.00

		support of the DLP settlement; begin drafting motion to intervene in Amerigold appeal; brief review of Barton's objections and responses required by order on motion to compel and confer with T. Wells regarding same.			
05/18/2023	CAC	Revise draft of stipulation of dismissal of adversary proceeding between 2999TC and HNGH; revise draft of stipulation of dismissal of appeal between 2999TC and HNGH.	2.30	\$300.00	\$690.00
05/18/2023	TBW	Correspondence with M. Allen regarding updates on receivership properties (.1); review Amerigold air conditioning bills (.2); coordinate payment of same (.2); correspondence with HN Capital regarding access to Turtle Creek (.2); confer with C. Thomas regarding [REDACTED] (.1); correspondence with counsel for Lumar regarding settlement agreement (.1); briefly review same (.2).	2.20	\$200.00	\$440.00
05/19/2023	CAC	Comment on Dixon's draft settlement agreement with BM318; finalize joint stipulations to dismiss second adversary proceeding between 2999TC and HNGH and appeal between 2999TC and HNGH; correspondence with J. Kane (HNGH counsel) regarding same and motion for final decree.	1.60	\$300.00	\$480.00
05/19/2023	CCK	Continue drafting Emergency Motion to Intervene and Dismiss Amerigold appeal; confer with C. Thomas regarding same.	4.50	\$385.00	\$1,732.50
05/21/2023	CCK	Review C. Thomas edits to motion to dismiss Amerigold appeal; further edits to same and forward same to SEC.	1.70	\$385.00	\$654.50
05/22/2023	CAC	Meet with Receiver to discuss [REDACTED]; review HNGH's draft motion for a final decree.	1.80	\$300.00	\$540.00
05/22/2023	CCK	Confirm with assistant that case in Judge Hoffman's court is stayed and hearing set for tomorrow was cancelled; review 5th Circuit IOPs regarding emergency motions; call with the SEC regarding motion to intervene and dismiss; confer with C. Thomas regarding same; continue drafting and revising emergency motion to intervene and stay; confer with T. Wells [REDACTED]; email exchanges with Barton's counsel regarding emergency motion; call with 5th Circuit clerks to provide notice of same.	4.40	\$385.00	\$1,694.00

05/22/2023	TBW	Correspondence with M. Gill regarding insurance for Rock Creek (.5); review Alpha Testing invoice and confer with C. Thomas regarding same (.2); review time sheets and coordinate payroll for Goldmark (.3); correspondence with A. Nino regarding landscaping (.2); briefly review motion to dismiss Amerigold Suites appeal (.3); correspondence with T. Huffman regarding conference for motion (.2); confer with C. Koonce regarding same (.2); correspondence with accountants regarding IRS reminder of overdue taxes (.5); review records for bank statements for accountants (1.1); travel to 2999 with C. Thomas to return Tesla and return to office (1.6); review mail (.5); review records for information regarding Rock Creek for insurance renewal (.4) correspondence with realtor for Rock Creek regarding same (.2); locate utility account numbers for HN capital and correspondence regarding same (.4); correspondence with Veritex bank regarding production of statements (.3); correspondence with S. Latham regarding files needed for accountants (.3).	7.20	\$200.00	\$1,440.00
05/23/2023	CCK	Review and respond to email from lender on Rock Creek regarding status and order compelling Barton's production; review and revise Notice regarding Barton's non-compliance, adding cite to contemnor bearing the burden of production regarding inability to comply.	0.90	\$385.00	\$346.50
05/23/2023	SRL	Review document productions received from JP Morgan Chase to analyze for bank statements from 2017-2020 to assist accountants with forensic analysis.	5.50	\$110.00	\$605.00
05/23/2023	CAC	Comment on Dixon's draft settlement agreement; comment on Lumar's draft settlement agreement; email with counsel to Dixon and Lumar regarding same; send draft settlement agreement to Receiver for comments.	2.40	\$300.00	\$720.00
05/23/2023	TBW	Correspondence with S. Latham regarding bank statements (.3); correspondence with Veracity regarding Microsoft 365 login credentials (.2); confer with C. Koonce and C. Thomas regarding same (.2); correspondence with accountants regarding missing bank statements (.2); correspondence with T. Huffman regarding incorrect login credentials (.1); correspondence with counsel for Dixon and Lumar (.2); finish	3.70	\$200.00	\$740.00

		drafting notice of non compliance (1.6); review invoices for air conditioning repairs at Amerigold Suites and coordinate payments for same (.3); correspondence with Parker county appraisal district regarding notices for BM318 (.3); confer with A. Carrillo regarding same (.1); correspondence with M. Gill regarding insurance for Rock Creek (.2).			
05/24/2023	CAC	Incorporate Receiver's comments to Lumar draft settlement agreement; circulate same and Dixon's draft to C. Koonce for review.	0.80	\$300.00	\$240.00
05/24/2023	CCK	Call the 5th Circuit regarding pending emergency motion; review Lumar/Dixon settlement documents; confer with T. Wells regarding [REDACTED]; confer with counsel for lender on Amerigold and confer with C. Thomas regarding same.	1.90	\$385.00	\$731.50
05/24/2023	SRL	Continue to analyze and index JP Morgan Chase's document productions to assist forensic accountants in analysis of same.	2.50	\$110.00	\$275.00
05/25/2023	CCK	Brief research regarding [REDACTED]; review motion to intervene and confer with C. Thomas regarding same; review SEC's brief in DLP appeal; review order denying emergency motion; draft email to NAFER board members requesting amicus participation and confer with C. Thomas regarding same; email with T. Wells regarding [REDACTED]; confer with A. Carrillo regarding [REDACTED]; confer with C. Thomas and A. Carrillo regarding [REDACTED].	2.40	\$385.00	\$924.00
05/25/2023	CAC	Draft motion to approve settlement with B. Walker and TBW; draft proposed order for same. [No charge]	4.80	\$0.00	\$0.00
05/25/2023	SRL	Organize and transmit updated WALL entity bank statements to C. Bremer at Ahuja & Clark.	0.70	\$110.00	\$77.00
05/25/2023	TBW	Correspondence with S. Lankford regarding information on age of Rock Creek house, electrical,	2.50	\$200.00	\$500.00

plumbing, HVAC, and roof (.3); correspondence with counsel for SBA regarding releasing UCC (.5); confer with C. Thomas regarding same (.3); correspondence with accountants regarding bank statements (.2); cursory review of First Development's motion to intervene (.4); briefly review SEC's brief regarding DLP appeal (.6); correspondence with counsel for Dixon regarding settlement agreement (.2).

05/26/2023	CCK	Email communications with team and counsel for Dixon regarding sequencing of court approval related to settlement; call with counsel for lender on Amerigold regarding strategy to get sale closed and confer with T. Wells and C. Thomas regarding same; call with the SEC regarding denial of permission to participate in the Amerigold appeal; confer with T. Wells regarding [REDACTED]; call with SEC trial counsel regarding motion to intervene; further call with SEC appellate counsel regarding Barton's emergency motion to stay filed in the Fifth Circuit.	5.50	\$385.00	\$2,117.50
05/26/2023	CAC	Revise drafts of settlement agreements with Lumar and Dixon; circulate same to Lumar and Dixon's counsels; correspondence with C. Koonce regarding [REDACTED]; correspondence with J. Kane (counsel to HNGH) regarding motion for final decree in 2999TC bankruptcy.	1.80	\$300.00	\$540.00
05/26/2023	SRL	Continue to review, organize, and index bank productions.	3.20	\$110.00	\$352.00
05/26/2023	TBW	Correspondence with counsel for Pate Jones regarding Ridgeview Addition (.2); correspondence with counsel for Circle H regarding Ridgeview Addition (.2); review motion for partial stay (.9); correspondence with Landmark Grading regarding updates on Opelika HUD draw (.2); briefly review Dixon and Lumar settlement agreements (.5); correspondence with S. Ramer regarding M. Barton personal property (.2); review auction website for M. Barton personal items (.3); correspondence with auctioneer regarding removing personal items from auction (.3); review auction website for any additional personal items (.6).	3.40	\$200.00	\$680.00

05/27/2023	CAC	Review Receiver's motion for summary judgment regarding Southern Properties Capital's (SPC) claimed ownership interests in preparation for SPC's response and the Receiver's reply.	0.40	\$300.00	\$120.00
05/28/2023	CAC	Revise C. Thomas declaration in support of SEC opposition to T. Barton's motion to stay receivership order.	1.40	\$300.00	\$420.00
05/30/2023	CAC	Finish reviewing Receiver's motion for summary judgment against SPC in preparation for SPC response and in preparation of drafting reply in support of same.	2.50	\$300.00	\$750.00
05/30/2023	TBW	Correspondence with J. McCarthy regarding access to 2999 Turtle Creek (.2); review and create summary of monthly expenses for Amerigold Suites (.8); pay insurance for Goldmark (.2).	1.20	\$200.00	\$240.00
05/31/2023	CCK	Review C. Thomas edits to declaration in support of opposition to Barton's emergency motion to stay and forward same to the SEC; review C. Thomas's communications with counsel to the City of Fort Worth regarding funds claimed by Marine Creek Ventures, LLC and confer with S. Latham regarding same; respond to same with further inquiry; lengthy and detailed review of SPC Response to MSJ and supporting evidence; confer with T. Wells and A. Carrillo regarding [REDACTED]; [REDACTED]; outline response to same and provide outline to C. Thomas.	5.80	\$385.00	\$2,233.00
05/31/2023	SRL	Research regarding ownership of Marine Creek Ventures, LLC.	0.40	\$110.00	\$44.00
05/31/2023	TBW	Begin reviewing Southern properties response to motion for summary judgment (1.4); briefly review SPC declarations (.5); correspondence with M. Gill regarding insurance for Rock Creek (.3); correspondence with S. Lankford regarding finalizing insurance for Rock Creek (.2); correspondence with Veracity regarding Microsoft 365 accounts (.8); review list of users and files from same (.4); review records for lists of Microsoft 365 files (.3); correspondence with J. McCarthy regarding Turtle Creek (.2); correspondence with J. Silvasan regarding repairs at Amerigold (.3); confer with C. Koonce regarding [REDACTED] (.3); correspondence with M. Pig regarding auction status (.2); review	5.10	\$200.00	\$1,020.00

		ownership of Marine Creek Ventures (.2).			
06/01/2023	CCK	Review correspondence from Barton regarding auction; review auction contract and confer with C. Thomas regarding same; confer regarding status of auction; begin drafting Reply in support of SPC MSJ, focusing on arguments related to summary proceeding process, evidence and discovery; confer with team regarding [REDACTED].	3.70	\$385.00	\$1,424.50
06/01/2023	TBW	Correspondence with S. Lankford regarding insurance renewal for 4107 Rock Creek and complete documents for same (1.2); correspondence with J. Silvasan regarding Amerigold maintenance (.3); correspondence with C. Koons regarding updates from review of Microsoft 365 data (.7); correspondence with Turtle Creek auctioneer regarding protocols for picking up items and general questions about access (.9); correspondence with S. Latham about materials for same (.2); confer with C. Thomas regarding updates (.3).	3.60	\$200.00	\$720.00
06/02/2023	CAC	Call with M. Salitore (UST for E.D. Tex.) regarding next steps.	0.40	\$300.00	\$120.00
06/02/2023	CCK	Confer with T. Wells regarding [REDACTED]; call with the SEC to confirm no change in declaration; review SEC's Response to Emergency motion to stay; continue drafting Reply in support of SPC.	1.00	\$385.00	\$385.00
06/02/2023	TBW	Correspondence with J. Medley regarding updates on airplane (.2); correspondence with counsel for Small Business Administration regarding current payoff for D4OP loan and steps required to clear UCC lien (.4); review loan documents an payoff amount from same (.4); confer with C. Thomas regarding same (.1); correspondence with M. Pigg regarding auction updates (.4); prepare check for Goldmark landscaper and scan for records (.2); correspondence with J. Silvasan regarding Dallas Housing Authority payments (.2); review ledger from same (.2); confer with C. Koonce regarding Tamamoi and auction (.1).	2.20	\$200.00	\$440.00
06/05/2023	CCK	Confer with T. Wells regarding [REDACTED];	4.50	\$385.00	\$1,732.50

		confer with T. Wells regarding [REDACTED]; continue drafting Reply in support of SPC MSJ, focusing on arguments related to scope of and basis for the Receivership Order and undisputed facts; confer with M. Mead regarding [REDACTED]; confer with T. Wells regarding strategy/process for having personal items picked up from Turtle Creek location; email exchange with V. Barton regarding same.			
06/05/2023	SRL	Review bank productions.	0.90	\$110.00	\$99.00
06/05/2023	CAC	Correspondence with J. Kane (HNGH) regarding resolving pending motion for sanctions in 2999TC bankruptcy case; review and comment on draft agreed order to deny HNGH's motion for sanctions; call with U.S. Trustee regarding next steps regarding closing 2999TC bankruptcy case.	0.50	\$300.00	\$150.00
06/05/2023	TBW	Correspondence with M. Pigg regarding regarding auction updates and scheduling pick up of items (.6); confer with C. Thomas regarding same (.3); emails to M. Edney, T. Huffman, and V. Barton regarding approval for M. Barton to retrieve personal items for T. Barton and V. Barton (.3); calculate interest for D4OP loan (.2); correspondence with counsel for SBA regarding payment options (.2); attempt to create online login for SBA payment (.4); correspondence with J. Silvasan regarding DHA portal (.2); correspondence with counsel for Lumar Land regarding updates (.2); correspondence with A. Hall regarding property updates (.1); correspondence with J. Medley regarding Third Coast request (.2); review DWU bill (.1); correspondence with counsel for Pate Jones and Circle H regarding Ridgeview Addition (.3); correspondence with C. Thomas and C. Koonce regarding Texas Workforce notice (.2); correspondence with C. Carr regarding status of 2999 Turtle Creek auction (.2).	3.50	\$200.00	\$700.00
06/06/2023	CCK	Research ISO Reply [REDACTED]	2.50	\$385.00	\$962.50
06/06/2023	CAC	Review Lumar's comments to draft settlement agreement over Bear Creek Ranch; correspondence	0.20	\$300.00	\$60.00

with J. Kane (HNGH) regarding agreed order to deny HNGH's motion for sanctions in 2999TC bankruptcy case.

06/06/2023	TBW	Review invoice for Goldmark repairs and coordinate payment (.3); correspondence with Frisco code enforcement (.2); confer with C. Thomas regarding [REDACTED] (.3); correspondence with C. Carr regarding 2999 Turtle Creek (.2); correspondence with M. Pigg regarding finalizing auction (.3); pay Goldmark TXU bill (.2); correspondence with A. Nino regarding landscaping (.2); review Barton's opposition to fee application (.4); review miscellaneous correspondence (.3); correspondence with owner of artwork at 2999 Turtle Creek (.3); correspondence with counsel for SBA regarding payment of loan (.3); coordinate payment of same (.2); review mail (.2); review invoices from Amerigold fire inspection work (.2); coordinate payment of Amerigold invoices (.2); correspondence with A. Hammack regarding meeting at Turtle Creek (.3).	4.10	\$200.00	\$820.00
06/07/2023	CAC	Cursory review SPC response's to Receiver's MSJ.	0.90	\$300.00	\$270.00
06/07/2023	CCK	Continue drafting Reply in support of MSJ regarding SPC's claimed interests.	2.60	\$385.00	\$1,001.00
06/07/2023	TBW	Review HNGH amicus brief (.6); review outstanding property taxes (.4); confer with C. Thomas regarding same (.1); review Amerigold payroll and coordinate checks (.2); review DLP settlement agreement to determine ownership of funds deposited with city of Fort Worth (.8); review DLP sale documents (.4); confer with C. Koonce regarding same (.2); review Barton response to HNGH amicus brief (.3).	3.00	\$200.00	\$600.00
06/08/2023	CCK	Confer with C. Thomas regarding [REDACTED]; email counsel for DLP regarding funds on deposit with the City of Fort Worth and email C. Thomas regarding same; review order from Fifth Circuit denying motion for stay without prejudice; review second motion filed by Barton regarding same; review various filings related to June 9 as deadline to vacate; call with C. Thomas to discuss same; call with SEC; prepare motion for extension of time regarding Reply in support of SPC and continue drafting same; [REDACTED]	8.40	\$385.00	\$3,234.00

		<p>[REDACTED]; call with HN Capital to discuss whether they are filing a response to second motion; draft Thomas declaration in support of SEC's response to second motion; further conference with SPC regarding 10 day extension and page extension; review SEC's further response to Barton's second motion for stay.</p>			
06/08/2023	CAC	Continue analysis of SPC's response to Receiver's MSJ; review Lumar's comments to settlement agreement regarding Bear Creek Ranch; call with Bobby Forshey (Lumar's counsel) regarding same.	0.50	\$300.00	\$150.00
06/08/2023	TBW	Confer with C. Thomas regarding [REDACTED] (2); correspondence with M. Pigg regarding same (2); correspondence with Landmark Grading regarding payment for D4OP work (2); review email from E. Espinosa regarding Fort Worth payment (2); correspondence with Alpha Testing regarding open invoice (3); review emergency motion to stay (4) review letter regarding deficiencies (2); review order granting amicus brief (2); confer with C. Koonce regarding declaration (2); correspondence with J. Silvasan regarding Amerigold A/C repairs (2); fully review First Development company of Ohio's motion to lift stay (1.2); begin outlining response (3); research intervention in receivership context (1.5); begin drafting response to motion to lift stay (2.3); correspondence with A. Hammack and friend of artwork owner at 2999 Turtle Creek to coordinate pick up (3).	7.90	\$200.00	\$1,580.00
06/09/2023	CCK	Review SPC's response to further conference and confer with A. Carrillo and C. Thomas regarding [REDACTED]; continue drafting motion for extension of time and page limitation; confer with C. Thomas regarding [REDACTED]; review Tamamoi settlement agreement, extensive edits and comments to same; review Barton Reply to SEC's Response to second motion to stay and C. Thomas's declaration; review Order regarding Barton's second emergency motion; review SPC's Response to motion for extension; continue drafting Reply in support of MSJ regarding SPC.	7.10	\$385.00	\$2,733.50
06/09/2023	CAC	Correspondence with J. Kane (HNGH counsel)	1.70	\$300.00	\$510.00

		regarding agreed order to resolve pending sanctions motion against 2999TC and Barton; finalize drafts of settlement agreements with Dixon and Lumar; correspondence with Dixon and Lumar regarding same; continue review of SPC's response to Receiver's MSJ to prepare reply.			
06/09/2023	TBW	Review Marine Creek PSA (.4); correspondence with M. Pigg and review of auction items in response to third party inquiry (1.4); confer with C. Thomas regarding same (.2); research receivership stays (1.3); continue drafting response to motion to stay (3.4); review SPC's response to motion for extension (.3); pay Turtle Creek TXU bill (.2); review Fifth circuit order (.2); correspondence with counsel for Pate Jones and Circle H regarding Ridgeview (.3); confer with C. Thomas regarding same (.1); correspondence with J. Silvasan regarding repairs and payments (.3).	8.10	\$200.00	\$1,620.00
06/12/2023	CAC	Draft motion to lift stay for Receivership Court for Dixon and Lumar adversary proceeding in BM318 chapter 11 case; send same to Receiver for review and approval.	1.60	\$300.00	\$480.00
06/12/2023	CCK	Call with the SEC regarding pending motion to intervene; confer with T. Wells regarding response to same; confer with C. Thomas and team regarding [REDACTED]; continue drafting Reply in support of SPC MSJ, focusing primarily on conditions precedent and prior default arguments, and differentiating performance required by each agreement related to exercise of Conversion Rights, and distinguishing authorities cited by SPC regarding same.	6.90	\$385.00	\$2,656.50
06/12/2023	TBW	Review and revise Tamamoi settlement agreement (1.7); correspondence with Title Partners regarding JMJ ledger (.2); correspondence with M. Pigg regarding auction items (.4); confer with C. Thomas regarding same (.1); review Grayson County appraisal district records (.6); review miscellaneous correspondence regarding Lumar and Dixon (.2); confer with C. Koonce regarding [REDACTED] (.2); research [REDACTED] (.8); continue drafting response to motion to lift stay (3.4).	7.60	\$200.00	\$1,520.00
06/13/2023	CCK	Confer with assistant regarding preparing Release of Lien related to 2999 Turtle Creek and respond to	6.40	\$385.00	\$2,464.00

email from J. Kane regarding same; review emails from team regarding [REDACTED]; confer with T. Wells regarding [REDACTED]; review and revise release of lis pendens; review C. Thomas questions regarding [REDACTED]; revise motion to lift stay regarding Dixon/Lumar; confer with team regarding [REDACTED]; email exchanges with attorney for creditor (golf course case) seeking settlement and agreement to lift lis pendens; continue drafting Reply, focusing on evidence and arguments regarding inclusion of relevant entities in the receivership.

06/13/2023	CAC	Review and revise draft motion to lift stay of BM318 bankruptcy case in accordance with draft settlement agreement with Lumar and Dixon.	1.20	\$300.00	\$360.00
06/13/2023	TBW	Review previous settlement agreement (.4); confer with C. Koonce regarding same (.1); revise Tamamoi settlement agreement (.3); correspondence with counsel for Tamamoi regarding revised settlement agreement (.6); correspondence with J. Silvasan regarding Amerigold (.2); finish drafting response to motion to lift stay (3.3); correspondence with A. Nino regarding landscaping and coordinate payment for same (.3); review miscellaneous receivership correspondence (.3); review mail (.5); return call to United Site Services (.1); review Lost Creek files (.4); correspondence with counsel for SBA regarding updates on receipt of payment (.4); confer with C. Thomas regarding same (.2); correspondence with counsel for American Express regarding past due bill for receivership entity (.2).	7.30	\$200.00	\$1,460.00
06/14/2023	CAC	Finalize and compile motion for final decree, proposed order, and exhibits for filing in 2999TC bankruptcy case.	0.50	\$300.00	\$150.00
06/15/2023	CCK	Continued edits to Response to Motion to Intervene; review and revise Thomas Dec in support; confer with T. Wells regarding [REDACTED]; call with accounting team regarding status of accounting work; summarize same for C. Thomas; continue drafting	5.20	\$385.00	\$2,002.00

		Reply in support of SPC MSJ, focusing on arguments related to "equitable ownership," whether HUD approval was "ministerial," and inclusion of relevant entities as Receivership Entities.			
06/15/2023	CAC	Review SPC response to Receiver's MSJ; review declarations attached to response in preparation of drafting motion to strike.	2.40	\$300.00	\$720.00
06/15/2023	TBW	Correspondence with G. Werley regarding lost creek (.4); confer with C. Thomas regarding same (.2); review and revise motion to intervene, receiver's declaration, and appendix in preparation for filing motion and coordinate filing of same (2.9); correspondence with property broker interested in Opelika property (.2); correspondence with accountants regarding bank statements (.3); continue drafting motion to ratify Tamamoi settlement (2.7); correspondence with J. Silvasan regarding Dallas housing authority (.3); review Lost Creek file (.2).	7.20	\$200.00	\$1,440.00
06/16/2023	CAC	Revise motion to lift stay of BM318 bankruptcy case in accordance with Dixon and Lumar's comments.	0.90	\$300.00	\$270.00
06/16/2023	TBW	Correspondence with G. Werley regarding meeting and coordinate same (.3); correspondence with J. Silvasan regarding A/C repairs for Amerigold (.2); continue drafting motion to ratify (1.2); correspondence with Terminix regarding invoices (.3); correspondence with K. O'Rourke regarding reconciling same (.2).	2.20	\$200.00	\$440.00
06/19/2023	CAC	Review SPC declarations in support of response to MSJ in preparation of drafting motion to strike.	0.70	\$300.00	\$210.00
06/19/2023	TBW	Finish drafting motion to ratify Tamamoi agreement (1.8); prepare proposed order for same (.5); confer with C. Koonce regarding same (.1); correspondence with J. Silvasan regarding A/C repairs (.2); review order granting second fee application (.2); review Fifth Circuit order (.2); confer with C. Thomas regarding [REDACTED] (2).	3.20	\$200.00	\$640.00
06/20/2023	CCK	Confer with C. Thomas regarding [REDACTED]; continue revising motion to approve Tamamoi settlement and multiple emails	2.60	\$385.00	\$1,001.00

		with T. Wells regarding [REDACTED]; call SEC attorney regarding providing notice of dismissal of Rock Creek in DLP and Amerigold appeals; further revisions to release of lis pendens related to Turtle Creek property; continue drafting SPC reply.			
06/20/2023	CAC	Finalize Dixon and Lumar settlement agreements and send to Receiver for signature; correspondence with Dixon and Lumar's counsels regarding same; draft evidence objections and motion to strike in connection with SPC's response to Receiver's motion for summary judgment.	0.90	\$300.00	\$270.00
06/20/2023	TBW	Review and coordinate payments for multiple receivership entities (1.1); review releases from previous settlement agreements (.5); review Tamamoi settlement agreement (.3); confer with C. Koonce regarding same (.3); brief research on loans and foreclosures (.6); correspondence with J. Silvasan regarding Amerigold (.3).	3.10	\$200.00	\$620.00
06/21/2023	CAC	Draft motion to strike evidence in SPC's response to Receiver's motion for summary judgment; review 2999TC bankruptcy appeal docket and T. Barton's pro se notice of appeal.	1.30	\$300.00	\$390.00
06/21/2023	CCK	Confer with C. Thomas regarding [REDACTED]; continue drafting Reply in support of SPC MSJ; email exchanges with HN Capital regarding Barton's pro se appeal of joint dismissal and review same; confer with C. Thomas regarding same.	1.80	\$385.00	\$693.00
06/21/2023	TBW	Revise Tamamoi settlement agreement (.9); revise working draft of motion to ratify and proposed order (1.1); correspondence with A. Nino regarding landscaping and coordinate payment or same (.3); correspondence with counsel for Tamamoi regarding agreement (.4); open and review mail from receivership mail box (.6).	3.30	\$200.00	\$660.00
06/22/2023	CCK	Review Barton's 28(j) notice in DLP appeal regarding dismissal in Rock Creek and confer with C. Thomas regarding same; continue drafting SPC Reply, focusing on arguments regarding executory nature of conversion rights, distinctions between Opelika transaction and the others, arguments that HUD approval was ministerial, and clean up	6.80	\$385.00	\$2,618.00

		regarding "comingling" arguments; review SEC's response to 28(j) letter in DLP appeal.			
06/22/2023	CAC	Continue drafting motion to strike SPC's evidence in connection with its response to the Receiver's motion for summary judgment; review SPC's declarations ISO response in connection with same; conduct research of same for Receiver's reply ISO motion for summary judgment.	1.70	\$300.00	\$510.00
06/22/2023	SRL	Research regarding title history of Somerset-Lost Creek Golf Course.	0.50	\$110.00	\$55.00
06/22/2023	TBW	Review Barton letter to Fifth Circuit (.3); review documents from Lost Creek transaction and related lawsuit (1.9); prepare summary for C. Thomas (.5); confer with C. Thomas regarding same (.4); correspondence with S. Latham regarding docket for Somerset v. LC Aledo (.3); correspondence with J. Silvasan regarding Air Texas invoices (.2); pay Goldmark Republic Services bill (.2).	3.80	\$200.00	\$760.00
06/23/2023	CCK	Call the SEC regarding Barton's 28(j) motion and whether they plan to move to dismiss Amerigold; continue drafting SPC Reply; confer with A. Carrillo regarding various evidentiary questions.	6.40	\$385.00	\$2,464.00
06/23/2023	CAC	Draft motion to strike SPC's evidence in connection with Receiver's summary judgment motion; review J. Lindauer's objection to 2999TC motion for final decree; call with Receiver regarding same; correspondence with Lumar's counsel regarding BM318 settlement agreement and next steps.	2.70	\$300.00	\$810.00
06/23/2023	TBW	Review SEC response to Barton Fifth Circuit letter (.2); prepare for meeting with G. Werley (.5); participate in same (.9); confer with C. Thomas regarding same (.2); briefly review J. Lindauer objection to final decree (.2); correspondence with counsel for SBA regarding status of payment (.2); review miscellaneous correspondence (.4); correspondence with counsel for Pioneer Finance regarding updates on Venus property (.2); briefly review title company documents and case law from G. Werley (.4).	3.20	\$200.00	\$640.00
06/25/2023	CCK	Continue drafting SPC reply, focusing on executory rights, rejection of same, and discussion distinguishing OP from three other transactions regarding conversion.	2.00	\$385.00	\$770.00

06/26/2023	CAC	Continue drafting motion to exclude SPC's Response evidence; conduct research of case law regarding same; review SPC's Response declarations in connection with same; circulate draft of same to C. Koonce, T. Wells and Receiver.	5.70	\$300.00	\$1,710.00
06/26/2023	SRL	Review Bank of America production and add same to index accordingly.	0.40	\$110.00	\$44.00
06/26/2023	CCK	Continue drafting Reply in support of SPC MSJ, revising and tightening arguments and ensuring response to everything relevant in the Response; confer with C. Thomas regarding [REDACTED].	6.40	\$385.00	\$2,464.00
06/26/2023	TBW	Review payoff letter from SBA (.2); confer with C. Thomas regarding same (.1); review Air Texas invoices for Amerigold and coordinate payment (.3); coordinate payment of storage unit (.2); correspondence with counsel for Circle H and Pate Jones regarding Ridgeview Addition (.4); fully review SPC MSJ response (1.6); research [REDACTED] (.9); research [REDACTED] (.6); review mail for legal responses (.3); review complaint against JMJ Development (.4); attempt to contact counsel for opposing party to same (.4); prepare notice of stay for Lee Engineering case (.5); review and revise working draft of SPC reply (2.4).	8.30	\$200.00	\$1,660.00
06/27/2023	CAC	Finalize motion to lift stay of BM318 bankruptcy case; review revisions to motion to exclude SPC's Response's summary judgment evidence; begin to draft proposed order for the same.	0.50	\$300.00	\$150.00
06/27/2023	SRL	Research status of Barton entities on Texas Secretary of State's website to determine tax forfeitures; research regarding TRWF Lodge, LLC; continue to audit bank production files.	2.30	\$110.00	\$253.00
06/27/2023	CCK	Email correspondence with lender on Frisco property regarding deficiency notice; review and begin revisions to Motion to Exclude, including additional research in support of same; confer with C. Thomas regarding [REDACTED]; continue editing same; confer with C. Thomas regarding [REDACTED].	7.20	\$385.00	\$2,772.00
06/27/2023	TBW	Confer with C. Koonce, A. Carrillo, and C. Thomas regarding status of agreements and	8.20	\$200.00	\$1,640.00

conferring (.3); review docket for Lee Engineering v. JMJ (.2); coordinate filing of motion to stay (.2); correspondence with counsel for Tamamoi regarding updates and documents (.5); coordinate review of secretary of state status checks regarding entities standing (.3); review status of same (.3); review and revise SPC reply (4.2); research [REDACTED] (1.4); correspondence with counsel for Pate Jones regarding Ridgeview Addition (.2); correspondence with J. Silvasan regarding fire inspection report (.2); correspondence with M. Taylor regarding same (.1); locate D4OP EIN and correspondence with M. Espinal regarding same (.3).

06/28/2023	SRL	Continue review of bank productions.	1.30	\$110.00	\$143.00
06/28/2023	CAC	Continue revising motion to exclude SPC's Response's summary judgment evidence; review Fifth Circuit's order regarding the receivership order; correspondence with Dixon's counsel re motion to lift stay of BM318 bankruptcy case; correspondence with SEC and T. Barton's counsel regarding same; review bankruptcy rules and local rules for briefing deadlines for 2999TC bankruptcy case.	0.90	\$300.00	\$270.00
06/28/2023	CCK	Continue drafting Reply in support of SPC MSJ, searching for specific references in the evidence, additional authorities, and revising as necessary; continue revising Motion to Strike regarding SPC's evidence; review appellate opinion on receivership order; confer with C. Thomas regarding same; confer with SPC regarding motion to stay deadline to reply; confer with counsel for DLP regarding Baton's attacks on his clients and C. Thomas; draft motion to stay Reply deadline.	6.90	\$385.00	\$2,656.50
06/28/2023	TBW	Correspondence with C. Roving regarding payment to Landmark (.3); review files for Landmark Grading contract at Opelika (.2); confer with C. Thomas regarding same (.1); review SPC declarations (.8); correspondence with C. Koonce regarding same (.2); review records for IRS documentation of EIN (.6); pay Goldmark Insurance (.2); correspondence with M. Espinal regarding new bank account (.2); review and revise reply to SPC (1.3); review fifth circuit order regarding receivership (.4).	4.30	\$200.00	\$860.00
06/29/2023	CAC	Review Receiver's motion to stay deadlines for	0.20	\$0.00	\$0.00

		motion for summary judgment regarding SPC. [No charge]			
06/30/2023	CAC	Correspondence with B. Forshey (Lumar's counsel) regarding status of settlement process.	0.20	\$300.00	\$60.00
06/30/2023	TBW	Review correspondence from G. Werley (.2); correspondence with S. Lankford regarding insurance carrier requests for Rock Creek (.4); correspondence with B. Forshey regarding updates on receivership (.1); correspondence with M. Espinal regarding new account opening (.2); review miscellaneous communication regarding receivership updates (.2).	1.10	\$200.00	\$220.00
				Quantity Subtotal	655.3
				Subtotal	\$181,337.00

SEC v. Barton – Non-Receiver Activity: Case Administration

Date	Initials	Description	Hours	Rate	Client Total
04/04/2023	TBW	Review receivership mail (.4).	0.40	\$200.00	\$80.00
04/04/2023	TBW	Travel to 2999 Turtle Creek to meet mover for auction company and Move Solutions and return to office (2.2); research additional commercial moving companies (.7); correspondence with All My Sons moving regarding quote for Turtle Creek (.2). [Rate reduced to paralegal rate]	3.10	\$110.00	\$341.00
04/07/2023	TBW	Travel to 2999 Turtle Creek to meet All My Sons moving, auction coordinator, and gather Barton family personal items (5.2); correspondence with Receiver regarding moving estimates (.2); review quotes from Move Solutions and All My Sons (.3); correspondence with Move Solutions (.1); correspondence with Hot Shot moving (.1). [Rate reduced to paralegal rate]	5.90	\$110.00	\$649.00
04/10/2023	SRL	Research regarding lawsuit filed involving Receivership Entity D4OP LLC in Alabama.	0.40	\$110.00	\$44.00
04/10/2023	TBW	Travel to Public Storage to discuss renting storage units (.5). [Rate reduced to paralegal rate]	0.50	\$110.00	\$55.00
04/11/2023	TBW	Finalize moving plans at 2999 Turtle Creek and travel to office (1.8); prepare map and organization	6.20	\$110.00	\$682.00

		system for Turtle Creek documents (.8); confer with Receiver regarding moving strategy (.4); miscellaneous communications to prepare for moving documents from Turtle Creek (1.4); trips to Public Storage to finalize storage units (1.8). [Rate reduced to paralegal rate]			
04/12/2023	SRL	Review USPS confirmations to analyze mail forwarding ending dates and determine any necessary extensions for Receivership Entities.	0.50	\$110.00	\$55.00
04/12/2023	TBW	Layout packing system at 2999 Turtle Creek; supervise and assist moving company with packing documents. [Rate reduced to paralegal rate].	8.70	\$110.00	\$957.00
04/13/2023	TBW	Supervise moving packed documents from 2999 Turtle Creek; travel to storage facility; prepare storage units for document boxes; supervise placement of document boxes in storage unit; return to office. [Rate reduced to paralegal rate]	6.60	\$110.00	\$726.00
04/14/2023	TBW	Correspondence with counsel for Lumar Land; correspondence with counsel for S. Bedoya; correspondence with J. Silvasan regarding plumbing issue at Amerigold Suites.	0.30	\$200.00	\$60.00
04/17/2023	CCK	Confer with C. Thomas regarding [REDACTED]; [REDACTED]; revise motion to confirm Litigation Stay and related order and confer with T. Wells regarding same; review Notice of Competing Offers regarding 2999 TC filed by Barton and review prior order from Lumar Settlement that forecloses need to comply with § 2001 regarding same; confer with C. Thomas regarding [REDACTED]; review Barton's notice regarding offers on 2999 TC; call with the SEC regarding conference on the motion to approve settlement with HN Capital.	3.10	\$385.00	\$1,193.50
04/17/2023	TBW	Travel to 2999 Turtle Creek to meet auction movers and auction photographer and supervise moving of auction pieces and return to office (2.8). [Rate reduced to paralegal rate]	2.80	\$110.00	\$308.00
04/24/2023	TBW	Review receivership mail (.6); correspondence with Elite Aviation and counsel to schedule time to survey airplane (.3); review All My Sons bill and correspondence with same regarding billing	5.60	\$200.00	\$1,120.00

question (.4); correspondence with Tennessee Department of Revenue regarding past due taxes (.1); research [REDACTED] (1.4); draft response to A. Morani email (.7); correspondence with C. Koonce regarding same (.2); review D4OP bank statements for SBA loan distributions (.6); correspondence with J. Silvasan regarding payment (.1); correspondence with K. O'Rourke regarding [REDACTED] (.3); review M. Barton affidavit (.2); review T. Barton personal property list (.2); prepare for Dixon and Lumar mediation (.5).

05/01/2023	SRL	Research [REDACTED] [REDACTED] 3.	0.70	\$110.00	\$77.00
05/03/2023	TBW	Travel to 3600 Gillespie to meet E. Maldonado to get quote on repairing porch (1.5). [Rate reduced to paralegal rate]	1.50	\$110.00	\$165.00
05/05/2023	TBW	Correspondence with City of Venus regarding citations for Ridgeview Addition (.3); review financials for Bellwether Ridge (.4) begin revising working draft of receiver's reply to privilege protocol (4.6); pay Goldmark TXU bill (.2); review correspondence regarding conference on motion from Southern Properties (.2); review receivership mail (.4).	6.10	\$200.00	\$1,220.00
05/09/2023	TBW	Travel to Gillespie to meet electrician to get quote on replacing electrical panels and return to office (1.7). [Rate reduced to paralegal rate]	1.70	\$110.00	\$187.00
05/10/2023	TBW	Review receivership mail (.4); prepare creditor letters for Burgess Wolff and J&G law (.7); pay Goldmark republic services bill (.2); correspondence with SBA regarding D4OP loan (.5); correspondence with J. Silvasan regarding air conditioning repairs at Amerigold (.3); confer with C. Thomas regarding [REDACTED] (.2); review estimates for same (.2); correspondence with counsel for Lumar regarding settlement agreement (.3); confer with C. Thomas regarding same (.2); correspondence with All My Sons regarding credit (.2); prepare letter to Vertex bank regarding account statements (.6); correspondence with Veritex Bank regarding same (.3); correspondence with City of Venus regarding Ridgeview citations (.3); correspondence with Terminix regarding bills (.4); correspondence with	5.10	\$200.00	\$1,020.00

		R. Chappel regarding Amerigold personals injury lawsuit (.3).			
05/18/2023	TBW	Travel to 2999 Turtle Creek to meet dusk to dawn movers to pack documents, supervise packing of documents, move documents to storage, and return to office (4.5). [Rate reduced to paralegal rate]	4.50	\$110.00	\$495.00
05/19/2023	TBW	Correspondence with Veracity regarding Microsoft 365 password (.1); confer with C. Thomas regarding same (.2); correspondence with counsel for Dixon regarding settlement agreement (.1); review Barton's objections to order compelling information (1.1); review motion to compel and order in preparation for drafting notice to court (.5); research regarding privilege assertions (1.8); begin drafting notice to court regarding non compliance with order (1.6); correspondence with S. Lankford regarding insurance for Rock Creek (.2); correspondence with J. Silvasan regarding Amerigold repairs (.2).	5.80	\$200.00	\$1,160.00
05/24/2023	TBW	Review and revise notice of non compliance (1.2) coordinate creation of appendix with K. O'Rourke (.3); review final draft before filing (.3); correspondence with S. Lankford regarding insurance for Rock Creek (.2); complete supplemental application for same (.5); correspondence with Veracity regarding Microsoft 365 accounts (.6); review list of users and metadata from same (.4); correspondence with Veritex regarding production of bank statements (.3); correspondence with J. Gitlin regarding First Development of Ohio (.4); confer with C. Koonce regarding same (.2).	4.40	\$200.00	\$880.00
05/25/2023	TBW	Travel to 2999 Turtle Creek to meet J. McCarthy to survey property and change locks (4.1). [Rate reduced to paralegal rate]	4.10	\$110.00	\$451.00
05/28/2023	CCK	Continue work on C. Thomas declaration in support of opposition to Barton's emergency motion to stay filed in the Fifth Circuit.	1.50	\$385.00	\$577.50
05/29/2023	CCK	Continue drafting Thomas declaration in support of opposition to Barton's emergency motion for stay.	4.40	\$385.00	\$1,694.00
05/29/2023	TBW	Review and revise C. Thomas declaration in support of opposition to motion to stay.	2.40	\$200.00	\$480.00
05/30/2023	CCK	Review C. Thomas edits to declaration in support of Opposition to Emergency Motion for Stay,	4.50	\$385.00	\$1,732.50

		revisions to same and forward to the SEC's appellate counsel; confer with C. Thomas and A. Carrillo regarding [REDACTED]; confer with members of NAFER regarding call to discuss amicus brief; call with C. Thomas to discuss [REDACTED]; call with SEC's appellate counsel regarding Declaration; conference with A. Carrillo and C. Thomas regarding accruing UST fees in various pending and stayed bankruptcies.			
05/30/2023	TBW	Travel to Bees Keys to get key made for 2999 Turtle Creek Access and return to office (.7). [Rate reduced to paralegal rate]	0.70	\$110.00	\$77.00
06/02/2023	TBW	Travel to 2999 Turtle Creek to meet with auctioneer to gather remaining Barton personal items and review items (2.9); travel to Amerigold Suites to deliver checks (.5). [Rate reduced to paralegal rate]	3.40	\$110.00	\$374.00
06/05/2023	MRM	Correspond with C. Koonce regarding standards applicable to unemployment claim by T. Barton.	0.30	\$385.00	\$115.50
06/05/2023	TBW	Travel to 2999 Turtle Creek to meet with M. Barton and T. Barton to retrieve personal items (4.3). [Rate reduced to paralegal rate]	4.30	\$110.00	\$473.00
06/06/2023	CCK	Review Response to fee petition; review Barton's Reply in support of motion for emergency stay; call with HN Capital to discuss their amicus brief; confer with C. Thomas regarding [REDACTED].	0.90	\$385.00	\$346.50
06/07/2023	CCK	Review amicus brief filed by HN Capital; confer with C. Thomas regarding [REDACTED]; begin drafting Reply in support of fee petition; review additional response to amicus filed by Barton; respond to inquiry regarding status received from creditor.	1.00	\$385.00	\$385.00
06/07/2023	TBW	Travel to home depot to purchase boxes (.4); travel to 2999 Turtle Creek to meet A. Hammack and remove remaining items to storage and return to office (3.8). [Rate reduced to paralegal rate]	4.20	\$110.00	\$462.00
06/14/2023	CCK	Review and revise Response to Motion to Intervene, and confer with T. Wells multiple times regarding same, including evidence supporting same; respond to inquiry from counsel for HN Capital regarding status of the Release of Lis	6.40	\$385.00	\$2,464.00

		Pendens; confer with T. Wells regarding [REDACTED]; [REDACTED]; call with the SEC; confer with team regarding [REDACTED].			
06/14/2023	TBW	Correspondence with accountants regarding franchise tax filings (.2); confer with C. Koonce and C. Thomas regarding Lost Creek (.2); review and pull bank records for payments to First Development Company (1.3); pull deed records from Grayson County (.4); review deed records (.6); correspondence with Title Partners regarding Titan payments (.3); confer with C. Koonce regarding same (.2); begin Tamamoi motion to approve settlement (1.8); coordinate preparing appendix for response to motion to intervene (.4); miscellaneous correspondence regarding receivership (.4); correspondence with counsel for Wall regarding documents received for same (.2); correspondence with counsel for American Express regarding past due bill (.2); review documentation for same (.2); ensure American Express is on creditor list (.2); correspondence with C. Koons regarding updates (.3).	6.90	\$200.00	\$1,380.00
06/19/2023	CCK	Review and begin revising motion to ratify settlement with Tamamoi; review order dismissing Rock Creek appeal and confer with C. Thomas regarding same; review Order granting fee petition; email accountants requesting list of disregarded entities filed under Barton's tax return	0.90	\$385.00	\$346.50
06/26/2023	JJM	File UCC-3 Termination Letter for D4OP, LLC and deliver copy to C. Thomas.	0.30	\$275.00	\$82.50
06/29/2023	CCK	Confer with C. Thomas regarding [REDACTED]; [REDACTED]; confer with Receiver team regarding [REDACTED]; [REDACTED]; call with DLP regarding dispute over fees on deposit with the City of Fort Worth; confer with C. Thomas regarding [REDACTED]; lengthy call with SEC regarding next steps, issues related to vacatur and evidence; call with accountants regarding 5th Circuit opinion, status of forensic accounting and confer with C. Thomas regarding same; review SPC's response to motion to stay and review order granting motion; respond to email from counsel for plaintiff regarding proposed scope	4.80	\$385.00	\$1,848.00

		of new receivership order to permit an assessment and award of sanctions against Barton individually.			
06/29/2023	TBW	Correspondence with M. Espinal regarding new D4OP bank account (.5); review files for D4OP EIN documentation (.4); coordinate filing of motion to stay to due to justice court computers being down (.2); correspondence with J. Silvasan regarding landscaping (.2); review SPC's opposition to motion to stay (.3); review appellate rules of procedure regarding timing of mandate (.2); correspondence with inspector for insurance carrier (.2); correspondence with T. Huffman regarding conference (.2); correspondence with counsel for Pate Jones regarding status of receivership (.2); confer with C. Thomas regarding [REDACTED] (.2); review [REDACTED] (.4); meeting with C. Thomas [REDACTED] (.4).	3.40	\$200.00	\$680.00
06/30/2023	CCK	Emails with Z. Hill regarding status of Amerigold sale; email with C. Thomas regarding request from party seeking sanctions against Barton individually; call with counsel for creditor seeking sanctions against Barton individually regarding scope of revised or new receivership and status of same; research regarding closing and transition issues related to vacatur of original receivership order and begin drafting motion to address same.	1.80	\$385.00	\$693.00
			Quantity Subtotal		130.1
				Subtotal	\$26,136.50

Sale of Amerigold Suites

Date	Initials	Description	Hours	Rate	Client Total
04/18/2023	JJM	Research Uniform Condominium Act and send summary of Termination Agreement to C. Thomas for potential disposal of existing Declarations encumbering property.	1.40	\$275.00	\$385.00
04/24/2023	JJM	Phone call with L. Osterman and C. Thomas regarding potential changes in Buyer's situation.	0.30	\$275.00	\$82.50
05/30/2023	JJM	Review and begin to revise Special Warranty Deed.	0.80	\$275.00	\$220.00

06/01/2023	JJM	Finish revising Special Warranty Deed; review Bill of Sale; review Notice to Residents; review Third Amendment to Purchase and Sale Agreement; deliver updated drafts and comments to C. Thomas.	1.70	\$275.00	\$467.50
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Quantity Subtotal 4.2

Subtotal \$1,155.00

Expenses Total \$0.00

Hours Total 789.6

Services Total \$208,628.50

Total \$208,628.50

Current Statement payable upon receipt and due within 30 days.

Federal Tax ID 61-1764390

Wire Payments
 Veritex Community Bank
 17950 Preston Road, Suite 500
 Dallas, TX 75252
 ABA # 113024164 Account # 30081159

Check Payments
 Brown Fox PLLC
 8111 Preston Road, Suite 300
 Dallas, TX 75225

Credit Card Payments <https://www.brownfoxlaw.com/payments>

Direct payment inquiries to the Account Services Department at accounting@brownfoxlaw.com

Thank you for choosing Brown Fox. We appreciate your business.

EXHIBIT D



Ahuja & Clark, PLLC
 Certified Public Accountants
Tax & Accounting • Business Valuations • Business Interruption • Forensic Accounting

Ahuja & Clark, PLLC

2901 N. Dallas Pkwy
 Suite 320
 Plano, TX 75093

Invoice # 8227.Bar

Invoice Date: 06/30/2023

Due Date: 7/31/2023

Bill To:
 Brown Fox Law – Barton Receivership
 Attn: Court Thomas

BILLING SUMMARY

ID	TIMEKEEPER	TITLE	HOURS	RATE	AMOUNT
AH	Ammon Hall	Jr. Associate	14.30	\$95.00	\$1,358.50
CB	Carolyn Bremer	Engagement Leader	6.10	\$325.00	\$1,982.50
DK	Devon Kwande	Manager	122.20	\$275.00	\$33,605.00
DP	Dawn Peterson	Administrative Staff	0.50	\$95.00	\$47.50
DS	Divya Shetty	CPA	14.80	\$275.00	\$4,070.00
JB	Jeanne – Marie Blevins	Associate	18.60	\$150.00	\$2,790.00
KW	Kiranpreet Walia	Snr Associate	85.00	\$210.00	\$17,850.00
MA	Madhu Ahuja	Engagement Leader	1.30	\$325.00	\$422.50
SH	Stacey Huser	Manager	11.90	\$275.00	\$3,272.50
SK	Shamsher Kaur	Associate	165.40	\$150.00	\$24,810.00
TC	Tony Cecil	CPA/CFE	72.40	\$275.00	\$19,910.00
VH	Viha Harikumar	Associate**	65.10	\$95.00	\$6,184.50

****Associate billed at Administrative Staff rate due to nature of work performed**

TOTAL 577.60 \$116,303.00

**Ahuja & Clark, PLLC**

Certified Public Accountants

Tax & Accounting • Business Valuations • Business Interruption • Forensic Accounting

Ahuja & Clark, PLLC

2901 N. Dallas Pkwy
Suite 320
Plano, TX 75093

Invoice # 8227.Bar

Invoice Date: 06/30/2023

Due Date: 7/31/2023

Bill To:

Brown Fox Law – Barton Receivership

Attn: Court Thomas

Date	ID	Description	Task	Hours	Amount
04/03/23	SK	Reviewed corrections made to Form 56.	3900	0.60	\$90.00
04/04/23	DK	Reviewed list of entities compared to QuickBooks files.	3900	1.50	\$412.50
04/04/23	SK	Continued review and corrections to Form 56.	3900	0.10	\$15.00
04/04/23	SH	Tested access to Online QuickBooks files.	2900	1.30	\$357.50
04/05/23	SH	Reviewed QuickBooks and bank statements for inquiry by Mr. Thomas.	2900	1.30	\$357.50
04/05/23	DK	Analyzed and updated the tax returns to be prepared.	3900	1.00	\$275.00
04/06/23	SH	Reviewed transactions regarding deposits and transfers between intercompany accounts.	2900	0.50	\$137.50
04/06/23	SH	Update meeting with Mr. Thomas and Mr. Wells.	2900	0.20	\$55.00
04/07/23	CB	Drafted and sent update on bank records to Receiver.	4900	0.30	\$97.50
04/10/23	DK	Reviewed which entities we have QuickBooks files for and checking the completion of QuickBooks data.	3900	2.00	\$550.00
04/11/23	DK	Reviewed QuickBooks and data.	3900	1.00	\$275.00
04/11/23	SH	Quarterly accounting.	2900	2.00	\$550.00
04/11/23	SH	Established access to Villita Towers QuickBooks Online file.	2900	0.30	\$82.50
04/13/23	SH	2023 Quarter 1 accounting and bank reconciliations.	2900	2.00	\$550.00
04/14/23	SH	Continue 2023 Quarter 1 accounting and Standard Fund Accounting Report preparation.	2900	1.50	\$412.50
04/18/23	DK	Searched state of Delaware database to confirm which entities are registered in the state of Delaware.	3900	1.50	\$412.50
04/18/23	DK	Communication with Receiver regarding prior year returns.	3900	0.10	\$27.50
04/20/23	TC	Reviewed Capital One bank records received from Receiver and SEC. Prepare document inventory schedule for bank records received for each of the receivership entities.	4900	2.80	\$770.00
04/21/23	TC	Reviewed Chase bank records received from SEC and document bank record inventory for each Receivership entity.	4900	2.10	\$577.50
04/21/23	SH	Reviewed reports per questions from Receiver on classification of deposits.	2900	1.00	\$275.00
04/24/23	TC	Reviewed Chase bank records received from SEC and document bank record inventory for each Receivership entity.	4900	2.40	\$660.00
04/24/23	DK	Searched the state of Nevada database for Nevada registrations.	3900	2.30	\$632.50

Date	ID	Description	Task	Hours	Amount
04/25/23	TC	Reviewed Chase bank records obtained from SEC and document bank record inventory.	4900	2.30	\$632.50
04/25/23	SK	Reviewed entities to verify which are active in the states of Delaware, Texas, or Nevada.	3900	4.30	\$645.00
04/26/23	TC	Completed review of Chase bank records. Document inventory of Chase bank records received for Receivership entities.	4900	3.60	\$990.00
04/26/23	SK	Continued review of entities to verify which are active in the state of Texas.	3900	4.10	\$615.00
04/27/23	TC	Reviewed production from banks received by Receiver and SEC. Document bank records received.	4900	2.90	\$797.50
04/28/23	SK	Continued review of entities to verify which are active in the state of Nevada.	3900	4.50	\$675.00
04/29/23	TC	Reviewed production from banks received by Receiver and SEC. Document bank records received.	4900	2.10	\$577.50
05/01/23	TC	Reviewed Capital One and Veritex bank records received from Receiver and SEC to date; prep data files to send to Valid8.	4900	5.60	\$1,540.00
05/01/23	DK	Preparation for and call with receiver regarding project status and prior year accountant's work.	3900	0.40	\$110.00
05/02/23	SK	Resubscribed QuickBooks access to 42 entities.	2900	4.10	\$615.00
05/02/23	SK	Extracted financial reports including Profit and Loss, Balance Sheet, and General Ledger for 42 entities from QuickBooks Online.	2900	1.00	\$150.00
05/03/23	SK	Continued extraction of financial reports including Profit Loss, Balance Sheet, General Ledger, and Transaction List by Vendor & Client for 42 entities from QuickBooks Online.	2900	7.30	\$1,095.00
05/04/23	CB	Email discussion with Receiver on bank statements for analysis and estimate.	4900	0.30	\$97.50
05/04/23	SK	Reviewed entities to verify if they are active in State of Delaware and updated our record accordingly.	2900	1.70	\$255.00
05/05/23	SK	Continued review of entities to verify if they are active in State of Delaware and updated our record accordingly.	3900	3.90	\$585.00
05/08/23	SK	Prepared Texas Franchise Tax extensions.	3900	2.30	\$345.00
05/09/23	SK	Reviewed and organized all PDF bank statement files in preparation for conversion to Excel.	4900	3.30	\$495.00
05/09/23	SK	Continued Texas Franchise Tax extension preparation.	3900	4.20	\$630.00
05/10/23	CB	Condensed and compiled bank statements for conversion to Excel.	4900	0.50	\$162.50
05/11/23	SK	Updated Texas Franchise Tax extensions reviewer notes.	3900	1.80	\$270.00
05/11/23	DK	Review of Texas Franchise Tax extensions.	3900	4.60	\$1,265.00
05/11/23	SK	Updated Texas Franchise Tax extension cover letters.	3900	2.20	\$330.00
05/11/23	DP	Released 2023 Texas Franchise Tax extensions mailing copies, instructions, and cover letter to Receiver for 66 entities.	3900	0.50	\$47.50
05/12/23	DK	Reviewed QuickBooks online and desktop files we have. Reviewed transactions in those files.	3900	5.40	\$1,485.00
05/12/23	SK	Prepared file record index according to additional entities and documents received.	3900	3.30	\$495.00
05/15/23	SK	Prepared organized list of 46 entities including information such as EIN and status of access to QuickBooks	2900	7.70	\$1,155.00
05/15/23	KW	Reviewed and organization of data received and indexing of QuickBooks access.	2900	4.50	\$945.00
05/16/23	SK	Reviewed available bank statements for 28 entities and updated our records on latest bank statement on hand and the ending balances per accounts.	2900	6.00	\$900.00

Date	ID	Description	Task	Hours	Amount
05/16/23	DK	Continued verification of status of QuickBooks for receivership entities.	3900	2.20	\$605.00
05/16/23	KW	Extracted available financials including Profit and Loss, Balance Sheet, and General ledger of 8 entities for years 2020 through 2022.	2900	4.00	\$840.00
05/17/23	SK	Continued to review available bank statements for 37 entities and updated our records on latest bank statement and ending balances per accounts.	2900	7.50	\$1,125.00
05/17/23	KW	Continued extraction of available financials including Profit and Loss, Balance Sheet, and General ledger of 12 entities for years 2020 through 2022.	2900	6.80	\$1,428.00
05/18/23	SK	Extracted financials for years 2020 through 2022 for 52 entities.	2900	7.20	\$1,080.00
05/19/23	SK	Continued extraction of financials for years 2020,2021, and 2022 for 38 entities.	2900	8.60	\$1,290.00
05/19/23	KW	Reviewed and organization of bank statements for 1 entity.	2900	1.10	\$231.00
05/22/23	AH	Converted bank statements for all Wall entities to Excel for analysis.	4900	5.80	\$551.00
05/22/23	DK	Performed a review of QuickBooks files for all entities.	3900	5.50	\$1,512.50
05/22/23	KW	Continued extraction of available financials including Profit and Loss, Balance Sheet, and General ledger of 10 entities for years 2020 through 2022.	2900	4.70	\$987.00
05/22/23	CB	Reviewed Wall entity bank statement documentation to determine missing information.	4900	0.40	\$130.00
05/23/23	DK	Reviewed documents submitted by Mr. Palepu, the prior CPA. Created an index and analysis table.	3900	3.80	\$1,045.00
05/23/23	SK	Reviewed 39 entities information on index file.	2900	5.30	\$795.00
05/24/23	TC	Reviewed bank records received from Receiver on 5/23/2023 to determine if records should be converted by Valid8.	4900	2.10	\$577.50
05/24/23	SH	Reviewed QuickBooks Online access with Intuit, related correspondence.	2900	0.80	\$220.00
05/24/23	SK	Verified existing discrepancies of 22 entities that do not have QuickBooks online access, instead had QuickBooks desktop files.	2900	7.00	\$1,050.00
05/24/23	KW	Reviewed and organized bank statements for 11 entities.	2900	7.00	\$1,470.00
05/24/23	DK	Analyzed documents from prior CPA. Comparison of QuickBooks files.	3900	5.90	\$1,622.50
05/25/23	DK	Analyzed documents from prior CPA determining entities ownership structure and investors.	3900	4.50	\$1,237.50
05/25/23	SK	Continued to extract financials for years 2020 through 2022 and updating our records for 18 entities.	2900	1.00	\$150.00
05/26/23	AH	Converted bank statements for all Wall entities to Excel for analysis	4900	2.40	\$228.00
05/26/23	SK	Continued verification of existing discrepancies of 24 entities that do not have QuickBooks online access, instead had QuickBooks desktop files	2900	3.30	\$495.00
05/26/23	DK	Reviewed Staff Accountant's work on matching QuickBooks activity to the bank statements.	3900	2.70	\$742.50
05/26/23	AH	Converted bank statements for all Wall entities to Excel for analysis.	4900	1.50	\$142.50
05/30/23	DK	Reviewed Staff Accountant's work on matching QuickBooks activity to the bank statements.	3900	3.00	\$825.00
05/30/23	KW	Reviewed activity between QuickBooks and bank statements for 10 entities.	2900	4.20	\$882.00

Date	ID	Description	Task	Hours	Amount
05/30/23	SK	Reviewed bank statements to QuickBooks for 19 entities.	2900	2.90	\$435.00
05/31/23	DK	Reviewed QuickBooks files activity, and project planning.	3900	4.00	\$1,100.00
05/31/23	KW	Reviewed the documents provided by the prior accountant and entered in the Excel tracker for 30 entities.	2900	4.00	\$840.00
05/31/23	SK	Continued review of bank statements to QuickBooks for 11 entities.	2900	1.60	\$240.00
06/01/23	DK	Reviewed Staff Accountant's work on matching QuickBooks activity to the bank statements.	3900	2.30	\$632.50
06/01/23	SK	Continued reviewed of bank statements to QuickBooks for 12 entities.	2900	1.80	\$270.00
06/02/23	KW	Verified bank balance to QuickBooks balance for 5 entities to analyze the General Ledger.	2900	4.80	\$1,008.00
06/02/23	VP	Reviewed documents: including bank statements received for 11 entities to verify all documents received for specific date ranges.	2900	4.80	\$456.00
06/02/23	SK	Verified the balance of last bank statement to the balance in QuickBooks and on General Ledger for 23 entities.	2900	3.50	\$525.00
06/02/23	DK	Reviewed Staff Accountant's work on matching QuickBooks activity to the bank statements.	3900	1.00	\$275.00
06/02/23	VP	Reviewed bank documents received for 1 entity.	2900	0.80	\$76.00
06/05/23	SK	Continued to verify the balance of last bank statements to balance in QuickBooks and on General Ledger for 32 entities.	2900	4.50	\$675.00
06/05/23	DK	Reviewed QuickBooks files against available bank statements.	3900	4.20	\$1,155.00
06/05/23	VP	Reviewed documents including bank statements received for 12 entities to verify all documents received for specific date ranges.	2900	3.90	\$370.50
06/05/23	KW	Continued verification of bank balance to QuickBooks balance to analyze the General Ledger for 4 entities.	2900	3.80	\$798.00
06/05/23	TC	Updated listing of bank accounts to document the bank accounts that have been converted using Valid8 or Scan Writer.	4900	1.40	\$385.00
06/05/23	MA	Reviewed project timeline and status update.	3900	0.30	\$97.50
06/06/23	SK	Reviewed financial statements extracted from QuickBooks for 26 entities.	2900	7.10	\$1,065.00
06/06/23	VP	Reviewed documents including bank statements received for 18 entities to verify all documents received for specific date ranges.	2900	7.00	\$665.00
06/06/23	KW	Continued verification of bank balance to QuickBooks balance to analyze the General Ledger for 8 entities.	2900	6.00	\$1,260.00
06/06/23	DK	Reviewed Staff Accountant's work on matching QuickBooks activity to the bank statements.	3900	3.00	\$825.00
06/06/23	AH	Converted bank statements for all Wall entities to Excel for analysis.	4900	0.30	\$28.50
06/07/23	VP	Reviewed documents including bank statements received for 15 entities to verify all documents received for specific date ranges.	2900	5.80	\$551.00
06/07/23	KW	Continued verification of bank balance to QuickBooks balance to analyze the General Ledger accuracy for 3 entities.	2900	3.20	\$672.00
06/07/23	DK	Reviewed Staff Accountant's work on matching QuickBooks activity to the bank statements.	3900	2.20	\$605.00
06/07/23	SK	Reviewed internal spreadsheet and bank statement list for 12 entities.	2900	2.00	\$300.00
06/07/23	TC	Reviewed bank statement conversions for all Wall entities.	4900	1.40	\$385.00

Date	ID	Description	Task	Hours	Amount
06/08/23	VP	Reviewed documents including bank statements received for 15 entities to verify all documents received for specific date ranges.	2900	6.70	\$636.50
06/08/23	DK	Reviewed QuickBooks files against available bank statements.	3900	4.50	\$1,237.50
06/08/23	SK	Continued review of document data base to internal organizer for 19 entities.	2900	2.30	\$345.00
06/08/23	TC	Continued review of bank statement conversions for Wall entities.	4900	1.50	\$412.50
06/09/23	VP	Reviewed documents including bank statements received for 13 entities to verify all documents received for specific date ranges.	2900	5.00	\$475.00
06/09/23	SK	Check and tie intercompany transactions across 36 entities.	2900	4.30	\$645.00
06/09/23	KW	Created intercompany transactions tab to check and tie intercompany transactions for 2 entities.	2900	3.00	\$630.00
06/09/23	DK	Started analysis of intercompany loans and transactions to verify all balance sheet accounts for intercompany loans agree.	3900	2.50	\$687.50
06/09/23	AH	Converted bank statements for all Wall entities to Excel for analysis.	4900	1.80	\$171.00
06/10/23	DK	Analyzed intercompany loans and transactions to verify all balance sheet accounts for intercompany loans agree. Created templates for reconciliations.	3900	7.00	\$1,925.00
06/12/23	DK	Reviewed intercompany loans.	3900	6.50	\$1,787.50
06/12/23	KW	Entered the intercompany balances for each year from the balance sheet of 10 entities in the intercompany tracker.	2900	5.60	\$1,176.00
06/12/23	VP	Reviewed documents including bank statements received for 12 entities to verify all documents received for specific date ranges.	2900	4.00	\$380.00
06/12/23	SK	Continued to work on the structure of intercompany transaction organization for 8 entities.	2900	3.30	\$495.00
06/12/23	AH	Converted bank statements for all Wall entities to Excel for analysis.	4900	1.50	\$142.50
06/13/23	SK	Continued to work on the structure of intercompany transaction organization for 11 entities.	2900	4.40	\$660.00
06/13/23	DK	Intercompany transaction review and reconciliation project.	3900	4.30	\$1,182.50
06/13/23	KW	Entered the intercompany balances for each year from the balance sheet of 6 entities in the intercompany tracker.	2900	4.00	\$840.00
06/13/23	VP	Reviewed documents including bank statements received for 2 entities to verify all documents received for specific date ranges.	2900	0.70	\$66.50
06/14/23	KW	Reviewed and organization of intercompany transactions. Entered the intercompany balances for 2 entities from balance sheets.	2900	6.00	\$1,260.00
06/14/23	DK	Reviewed and analyzed intercompany transactions.	3900	5.60	\$1,540.00
06/14/23	SK	Entered intercompany balances for 28 entities.	2900	5.40	\$810.00
06/14/23	DS	Reviewed spreadsheet for the last QuickBooks activity and the last bank statement for 17 entities.	2900	2.80	\$770.00
06/14/23	VP	Reviewed documents including bank statements received for 1 entity to verify all documents received for specific date ranges.	2900	0.50	\$47.50
06/15/23	JB	Performed accuracy checks /reconciliations to ensure accuracy of financial activity per bank statement conversion.	4900	5.60	\$840.00
06/15/23	DK	Reviewed and analyze intercompany transactions.	3900	2.50	\$687.50

Date	ID	Description	Task	Hours	Amount
06/15/23	TC	Reviewed Excel schedules of converted bank records for Wall entities; begin to combine schedules for all bank transactions for Wall entities; update list of bank accounts to be reviewed.	4900	2.30	\$632.50
06/15/23	VP	Reviewed documents including bank statements received for 3 entities to verify all documents received for specific date ranges.	2900	1.30	\$123.50
06/15/23	DS	Reviewed spreadsheet for the last QuickBooks activity and the last bank statement for 4 entities.	2900	0.70	\$192.50
06/15/23	SK	Entered intercompany balances for 6 entities in spreadsheet.	2900	0.70	\$105.00
06/15/23	CB	Update call with Receiver (Mr. Thomas, and Ms. Koonce), Ms. Ahuja, Mr. Kwande and Mr. Cecil to discuss updates and analysis of bank records.	4900	0.50	\$162.50
06/15/23	TC	Update call with Receiver (Mr. Thomas, and Ms. Koonce), Ms. Ahuja, Mr. Kwande and Ms. Bremer to discuss updates and analysis of bank records.	4900	0.50	\$137.50
06/15/23	KW	Entered the intercompany balances for each year from the balance sheet of each entity in the intercompany tracker.	2900	0.30	\$63.00
06/15/23	CB	Reviewed listing of bank statements converted for analysis and email to see if receiver has received any additional statements.	4900	0.20	\$65.00
06/16/23	TC	Joined all converted bank transactions for Wall entities and reconcile to bank records.	4900	4.80	\$1,320.00
06/16/23	VP	Reviewed documents including bank statements received for 14 entities to verify all documents received for specific date ranges.	2900	4.00	\$380.00
06/16/23	DS	Reviewed spreadsheet for the last QuickBooks activity and the last bank statement for 9 entities.	2900	1.50	\$412.50
06/16/23	AH	Converted bank statements for all Wall entities to Excel for analysis.	4900	1.00	\$95.00
06/16/23	SK	Entered intercompany balances for 3 entities in spreadsheet.	2900	0.60	\$90.00
06/15/23	DK	Meeting with Mr. Thomas, Mr. Cecil, Ms. Ahuja, Ms. Bremer, and Ms. Koonce to discuss project progress.	3900	0.50	\$137.50
06/17/23	DK	Reviewed and analyzed intercompany transactions.	3900	4.00	\$1,100.00
06/19/23	TC	Begin to review Wall entity transactions; identify Inflows and outflows (credits and debits).	4900	6.80	\$1,870.00
06/19/23	KW	Reconciliation of intercompany transactions of 60 entities.	2900	4.50	\$945.00
06/19/23	JB	Performed accuracy checks /reconciliations to ensure accuracy of financial activity per bank statement conversion.	4900	4.20	\$630.00
06/19/23	SK	Entered intercompany Balances for 8 entities into spreadsheet.	2900	2.80	\$420.00
06/19/23	SK	Traced and compared intercompany transaction amounts and years for 151 entities.	2900	2.70	\$405.00
06/19/23	DS	Reviewed spreadsheet for the last QuickBooks activity and the last bank statement for 13 entities.	2900	2.10	\$577.50
06/20/23	JB	Performed accuracy checks /reconciliations to ensure accuracy of financial activity per bank statement conversion.	4900	6.40	\$960.00
06/20/23	TC	Analyzed the movement of funds for the Wall entities.	4900	6.20	\$1,705.00
06/20/23	SK	Completed cross check of intercompany transactions for 148 entities.	2900	5.80	\$870.00
06/20/23	KW	Reviewed Tim Barton return to find the list of Schedule C entities. Reconciliation of intercompany transactions for 60 entities.	2900	5.00	\$1,050.00
06/20/23	DS	Reviewed spreadsheet for the last QuickBooks activity and the last bank statement for 23 entities	2900	3.50	\$962.50

Date	ID	Description	Task	Hours	Amount
06/21/23	VP	Reviewed documents including bank statements received for 16 entities to verify all documents received for specific date ranges.	2900	6.60	\$627.00
06/21/23	DK	Reviewed staff work on intercompany loans reconciliation.	3900	5.90	\$1,622.50
06/21/23	TC	Analyzed the movement of funds inflows and outflows for the Wall entities. Review SEC complaint to identify key players. Review QuickBooks reports for Wall entities to confirm investors.	4900	5.00	\$1,375.00
06/21/23	SK	Continued review of record index for 36 entities.	2900	1.60	\$240.00
06/21/23	KW	Prepared notice tracker in Excel.	2900	0.50	\$105.00
06/21/23	JB	Exported bank activity data from Valid8 for analysis.	4900	0.30	\$45.00
06/22/23	TC	Completed initial review of inflows outflows for all Wall entities and prepare summary of funds movement.	4900	5.00	\$1,375.00
06/23/23	DS	Reviewed spreadsheet for the last QuickBooks activity and the last bank statement for 5 entities.	2900	0.70	\$192.50
06/26/23	TC	Imported bank data into data analysis software to perform analysis; develop keyword searches to analyze the inflows and outflows of bank transactions.	4900	7.30	\$2,007.50
06/26/23	DK	Created a reconciliation template with instructions for Ms. Kaur and Ms. Walia to reconcile intercompany transactions. Review of intercompany transactions.	3900	5.50	\$1,512.50
06/26/23	CB	Reviewed summary for Receiver of forensic activity.	4900	0.30	\$97.50
06/27/23	DK	Reviewed staff work on intercompany loans reconciliation.	3900	4.00	\$1,100.00
06/27/23	VP	Reviewed documents including bank statements received for 12 entities to verify all documents received for specific date ranges.	2900	3.00	\$285.00
06/27/23	SK	Streamlined the structure for intercompany loans transactions tab for 73 entities.	2900	1.70	\$255.00
06/28/23	DK	Reconciled intercompany loan accounts.	3900	5.30	\$1,457.50
06/28/23	DS	Reviewed spreadsheet for the last QuickBooks activity and the last bank statement for 20 entities.	2900	3.50	\$962.50
06/28/23	SK	Data review and analyzed journal entries required based on the intercompany balances for 9 entities.	2900	2.60	\$390.00
06/28/23	KW	Data review and analyzed adjusting journal entries needed for intercompany balances.	2900	2.00	\$420.00
06/28/23	VP	Reviewed documents including bank statements received for 3 entities to verify all documents received for specific date ranges.	2900	1.70	\$161.50
06/29/23	VP	Reviewed documents including bank statements received for 14 entities to verify all documents received for specific date ranges.	2900	5.00	\$475.00
06/29/23	SK	Completed data review and analyzed journal entries required based on the intercompany balances for 4 entities.	2900	1.50	\$225.00
06/29/23	CB	Update call with Receiver (Mr. Thomas and Ms. Koonce), Ms. Ahuja, Mr. Cecil, and Ms. Huser to discuss updates on receivership, review forensic tracing and discuss receiver requirements for further bank tracing.	4900	1.00	\$325.00
06/29/23	MA	Update meeting with Ms. Koonce, Mr. Thomas, Mr. Cecil, Ms. Huser and Ms. Bremer; review of revoked entity files.	3900	1.00	\$325.00
06/29/23	SH	Call with Receiver, Ms. Ahuja, Ms. Bremer, and Mr. Cecil to discuss updates on receivership.	2900	1.00	\$275.00

Date	ID	Description	Task	Hours	Amount
06/29/23	TC	Update call with Receiver (Mr. Thomas and Ms. Koonce), Ms. Ahuja, Ms. Bremer, and Ms. Huser to discuss updates on receivership, review forensic tracing and discuss receiver requirements for further bank tracing.	4900	1.00	\$275.00
06/30/23	VP	Reviewed documents including bank statements received for 15 entities to verify all documents received for specific date ranges.	2900	4.30	\$408.50
			Total		\$116,303.00
			Balance Due		\$116,303.00

NOTE: Total Fees are net of write off fees of \$10,707.00 for internal discussions and familiarizing with background information of entities.

EXHIBIT E

EXHIBIT E 1

Veracity Forensics LLC

5220 Spring Valley Rd Ste 220
 Dallas, TX 75254 US
 877-499-6878
 accounting@veracity-forensics.com



VERACITY FORENSICS LLC
 DIGITAL INVESTIGATION AND DISCOVERY EXPERTS

INVOICE

BILL TO
 Cortney C. Thomas, Receiver
 8111 Preston Rd., Suite 300
 Dallas, TX 75225

INVOICE 759
DATE 04/30/2023
TERMS Due on receipt
DUE DATE 04/30/2023

REFERENCE
 Barton Receivership

TX LICENSE
 A22974701

VF PROJECT
 20221019-D01-BTR

DESCRIPTION	QTY	RATE	AMOUNT
Forensic Image Computer – Windows 3rd Floor Dell LT (041)	1	750.00	750.00T
Forensic Image of External Drive Saskya’s 3rd Floor Kingston TD (43) Max 3rd Floor HR TD (045)	2	500.00	1,000.00T
Analyst Time Export and upload “Tax and Entity” documents, provide summary report of 041 and 045, export of all files from 045 and targeted export of targeted export based on file type of 041	4.25	285.00	1,211.25T
Storage of Original Devices Monthly Storage Feb (24), Mar (24) and Apr (25)	73	25.00	1,825.00T
Desktop Computers (13), (004, 005, 008, 010, 012, 020, 021, 022, 023, 026, 031, 032, 033)			
Laptop Computers (5), (013, 024, 030, 034, 041)			
Server (3) , (006, 009, 025)			
Internal HD’s (4), (001, 008a, 027, 036)			
Flash Drives (011, 014, 015, 016, 017, 018, 019, 028, 029, 037, 040a, 040b, 040c, 043, 045)			
Various CD’s, DVD’, Dongles, SD Cards, Storage Bin			
Receiver Discount (12%)	1	-574.35	-574.35

SUBTOTAL	4,211.90
TAX	394.87
TOTAL	4,606.77
<hr/>	
BALANCE DUE	\$4,606.77

E □ HIBIT E □ 2

Veracity Forensics LLC

5220 Spring Valley Rd Ste 220
 Dallas, TX 75254 US
 877-499-6878
 accounting@veracity-forensics.com



VERACITY FORENSICS LLC
 DIGITAL INVESTIGATION AND DISCOVERY EXPERTS

INVOICE

BILL TO
 Barton Receivership
 8111 Preston Rd., Suite 300
 Dallas, TX 75225

INVOICE 773
DATE 05/31/2023
TERMS Due on receipt
DUE DATE 05/31/2023

REFERENCE
 Barton Receivership

TX LICENSE
 A22974701

VF PROJECT
 20221019-D01-BTR

DESCRIPTION	QTY	RATE	AMOUNT
Analyst Time M365 administration, change Admin password, implement legal hold, verify all other users were logged out, export report for all active users, call with receiver,	9.40	285.00	2,679.00T
Receiver Discount 12%	-1	321.48	-321.48T

We appreciate the opportunity to be of service. ACH & check payments are preferred and credit card payments are accepted with a 3.5% processing fee. Please email accounting@veracity-forensics.com to request a payment link.

SUBTOTAL	2,357.52
TAX	194.50
TOTAL	2,552.02
BALANCE DUE	\$2,552.02

EXHIBIT E 3

Veracity Forensics LLC

5220 Spring Valley Rd Ste 220
 Dallas, TX 75254 US
 877-499-6878
 accounting@veracity-forensics.com



VERACITY FORENSICS LLC
 DIGITAL INVESTIGATION AND DISCOVERY EXPERTS

INVOICE

BILL TO
 Barton Receivership
 8111 Preston Rd., Suite 300
 Dallas, TX 75225

INVOICE 805
DATE 06/30/2023
TERMS Due on receipt
DUE DATE 06/30/2023

REFERENCE
 Barton Receivership

TX LICENSE
 A22974701

VF PROJECT
 20221019-D01-BTR

DESCRIPTION	QTY	RATE	AMOUNT
Analyst Time Investigation AD permission, initiate full eDiscovery export	9.75	285.00	2,778.75T
Materials M365 Licensing	1	53.60	53.60T
Receiver Discount 12%	1	-333.45	-333.45

We appreciate the opportunity to be of service. ACH & check payments are preferred and credit card payments are accepted with a 3.5% processing fee. Please email accounting@veracity-forensics.com to request a payment link.

SUBTOTAL	2,498.90
TAX	233.67
TOTAL	2,732.57
BALANCE DUE	\$2,732.57