#### UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,	) ) )
Plaintiff,	Civil Action No. 18-cv-5587
v.	) Hon. John Z. Lee
EQUITYBUILD, INC., EQUITYBUILD FINANCE, LLC, JEROME H. COHEN, and SHAUN D. COHEN,	) Magistrate Judge Young B. Kim )
Defendants.	) ) _ )

#### RECEIVER'S NINTH INTERIM APPLICATION AND MOTION FOR COURT APPROVAL OF PAYMENT OF FEES AND EXPENSES OF RECEIVER AND RECEIVER'S RETAINED PROFESSIONALS

Kevin B. Duff, as the receiver ("Receiver") for the Estate of Defendants EquityBuild, Inc., EquityBuild Finance, LLC, their affiliates, and the affiliate entities of Defendants Jerome Cohen and Shaun Cohen, as defined in the Order Appointing Receiver entered August 17, 2018 (Docket No. 16), as supplemented by Order entered March 14, 2019 (Docket No. 290) and Order entered February 21, 2020 (Docket No. 634) (collectively, the "Receivership Defendants"), and pursuant to the powers vested in him by Order of this Court, respectfully submits this Ninth Interim Application ("Application") for the Third Quarter of 2020, and moves this Court for an order approving payment of the fees and expenses of the Receiver, the Receiver's counsel, Rachlis Duff & Peel, LLC ("RDP"), the Receiver's accountants BrookWeiner, LLC ("BrookWeiner") and Whitley Penn, the Receiver's claims vendor Axos Fiduciary Services ("Axos"), and the Receiver's forensic IT consultant, Prometheum, from the Receivership Estate operating account. In support of his Application and Motion, the Receiver states as follows:

#### I. BACKGROUND

- 1. On August 15, 2018, the United States Securities and Exchange Commission ("SEC") filed a civil Complaint against Jerome Cohen, Shaun Cohen, EquityBuild Inc., and EquityBuild Finance LLC (collectively the "Defendants") alleging violations of federal securities laws, along with a motion for entry of an asset freeze, permanent injunction, and other ancillary relief. (Docket Nos. 1 & 3, respectively)
- 2. In their Complaint against the Defendants, the SEC alleged violations of Section 10(b) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. § 78j(b), and Rule 10b-5 promulgated thereunder, 17 C.F.R. 240.10b-5, Section 20(a) of the Exchange Act, 15 U.S.C. §78t(a), Sections 5(a) and 5(c) of the Securities Act of 1933 (the "Securities Act"), 15 U.S.C. §77e(a) and (c), and Section 17(a) of the Securities Act, 15 U.S.C. §877q(a)q. (Docket No. 1)
- 3. The Complaint further alleged that the Defendants operated a Ponzi-scheme that raised at least \$135 million from more than 900 investors by, among other things, making untrue statements of material fact in connection with the sale of promissory notes allegedly secured by residential real estate primarily located on the south side of Chicago. (*Id.* ¶¶ 1-7, 17, 20-51)
- 4. On August 28, 2018, the Court entered a judgment against defendants Jerome Cohen and Shaun Cohen which, among other things, enjoined future violations of federal securities laws. (Docket No. 40)
- 5. In connection with its civil action, the SEC sought and obtained Court approval for the appointment of a Receiver, and on August 17, 2018, this Court entered an Order Appointing Receiver. (Docket No. 16)

- 6. Under the Order Appointing Receiver, the Receiver was authorized to engage and employ persons and entities in his discretion to assist him in carrying out the duties and responsibilities set forth in the Order. (*Id.*, Order Appointing Receiver, ¶ 54)
- 7. Accordingly, the Receiver retained Rachlis Duff Adler Peel & Kaplan, LLC ("RDAPK")<sup>1</sup> as special counsel, and, on August 20, 2018, the Court entered an Order approving RDAPK's rates. (Docket No. 19) On August 23, 2018, the Receiver retained BrookWeiner and Whitley Penn to provide accounting services and to perform tax and related work regarding the assets of the Receivership Defendants, and, on August 28, 2018, the Court entered an Order approving BrookWeiner's and Whitley Penn's rates. (Docket No. 39) On August 31, 2018, the Receiver retained Prometheum to access and preserve data within EquityBuild's cloud-based storage systems and provide related IT services, and, on September 6, 2018, the Court entered an order approving Prometheum's rates. (Docket No. 56).
- 8. Pursuant to the Order Appointing Receiver, the Receiver and his retained personnel are entitled to "reasonable compensation and expense reimbursement" from the Receivership Estate, as described in the "Billing Instructions for Receivers in Civil Actions Commenced by the U.S. Securities and Exchange Commission" (the "Billing Instructions") agreed to by the Receiver. (Docket No. 16,  $\P$  69)

#### II. NINTH INTERIM APPLICATION

- 9. Pursuant to the Billing Instructions, the Receiver provides the following information regarding the application:
  - a. The Application covers the period from July 1, 2020 through September 30,2020;

<sup>&</sup>lt;sup>1</sup> As of October 1, 2019, the firm changed its name to Rachlis Duff & Peel, LLC ("RDP").

- b. The names and hourly rates of all professionals for RDP, BrookWeiner, and Whitley Penn, as well as Axos' and Prometheum's hourly rates, are attached as **Exhibit A.**
- c. This is the Receiver's ninth interim application. The dates and amounts of the Receiver's prior interim fee applications, the orders and amounts allowed, and the amounts paid and unpaid, are attached hereto as **Exhibit B**.

#### III. CASE STATUS

- 10. Pursuant to the Billing Instructions, the Receiver provides the following information regarding the status of the case, and activities performed specifically for the period covered by this Application.
  - a. The Receiver's Standardized Fund Accounting Report ("SFAR") for the Third Quarter 2020 is attached as **Exhibit C.** The SFAR sets forth the funds received and disbursed from the Receivership estate during this reporting period. As reported in the SFAR, the amount of cash on hand as of September 30, 2020 was \$1,167,227.32. The information reflected in the SFAR was based on records and information currently available to the Receiver. The Receiver and his advisors are continuing with their evaluation and analysis.
    - b. Upon his appointment, the Receiver began making efforts to determine the nature, location, and value of all property interests of the Receivership Defendants, including monies, funds, securities, credits, effects, goods, chattels, lands, premises, leases, claims, choses in action, rights and other assets, together with all profits, interest, or other income attributable thereto, which the Receivership Defendants owned, possessed, retained a beneficial interest in, or controlled directly or indirectly, and to preserve and maintain those assets. In furtherance of such, the Receiver took, *inter alia*, the following actions:

#### i. Identification and Preservation of Assets

During the Third Quarter 2020, one of the Receiver's primary focuses continued to be the preservation, operation, maintenance, and sale of the 76 real estate properties remaining in the Receivership Estate at the beginning of the quarter. The Receiver, in connection with his counsel, asset manager/real estate broker, and property managers, continued working to improve understanding and planning for cash flow needs for underperforming properties, and controlling expenditures where possible. To that end, the Receiver and his counsel communicated regularly with property managers relating to necessary expenditures for properties requiring approval by the Receiver (and in some cases, requiring funds from the Receiver), and other operational questions. The Receiver and his retained professionals also reviewed monthly financial reporting, analyzed the cash position of the Estate, and communicated regularly with the real estate broker regarding prioritization of expenses and repairs on the properties.

During the Third Quarter 2020, the Receiver worked closely with the two existing property management companies to ensure that all health, life, and safety issues at the properties were addressed expeditiously, and to monitor repairs, inspections, expenses, and property finances designed to preserve the properties and protect their financial position.

The Receiver continued working with an adjuster to pursue claims for property and business interruption losses in connection with a fire that had occurred in November 2019 at 638 N. Avers, for which \$294,328.19 was received in the third quarter.

Additionally, the Receiver, with the assistance of counsel and the property managers worked to address open building code violations of widely varying levels of severity. Only a limited number of City of Chicago administrative actions went forward during the quarter due to the pandemic, and the majority of administrative court hearings, and all housing court hearings in

pending actions were continued. The Receiver's counsel appeared at six administrative hearings on violations issued by the Department of Sanitation, obtaining non-suits in three of these matters and a reduced fine in three others. Counsel for the Receiver resolved three additional administrative matters by online submissions to the Department of Buildings, obtaining nonsuit orders dismissing two of them and a favorable settlement in the third matter. Additionally, during the quarter, the Receiver's counsel received numerous orders continuing hearings and six new notices of violations issued by the City of Chicago's Department of Sanitation, and maintained its docket for all pending matters. As of September 30, 2020, there remained 20 known open City of Chicago matters involving code violations.

#### ii. Property Sales

The Receiver and his retained professionals closed the sales of the following 12 receivership properties during the Third Quarter 2020, generating aggregate net proceeds in the amount of \$7,754,439:

- 1. 8209 S. Ellis
- 2. 11117 S. Longwood
- 3. 7300-04 S. St. Lawrence
- 4. 7110-16 S. Cornell
- 5. 7957-59 S. Marquette
- 6. 7051 S. Bennett
- 7. 3074 Cheltenham
- 8. 2736-44 W. 64th
- 9. 5618-20 S. King
- 10. 6356 S. California
- 11. 6355-59 S. Talman
- 12. 7201 S. Constance

Consistent with the Court's orders approving these sales, the Receiver segregated these net proceeds into separate subaccounts. (Docket Nos. 615, 616)

Also during the quarter, the Receiver marketed the remaining properties approved for public sale in the Order granting Receiver's Sixth Motion For Court Approval Of The Process For

Public Sale Of Real Estate By Sealed Bid (Docket No. 676) and the Receiver's Eighth Motion For Approval Of The Process For Public Sale Of A Parcel Of Vacant Land (Docket No. 711):

- 6217-27 South Dorchester Avenue, Chicago, Illinois 60637
- 7255-57 South Euclid Avenue, Chicago, Illinois 60649
- 4317-19 South Michigan Avenue, Chicago, IL 60653
- 7442-48 South Calumet Avenue, Chicago, Illinois 60619
- 7701-03 South Essex Avenue, Chicago, Illinois 60649
- 816-20 East Marquette Road, Chicago, Illinois 60621
- 1422-24 East 68th Street, Chicago, Illinois 60637
- 2800-06 East 81st Street, Chicago, Illinois 60617
- 4750-52 South Indiana Avenue, Chicago, Illinois 60615
- 7840-42 South Yates Avenue, Chicago, Illinois 60649
- 7024-32 South Paxton Avenue, Chicago, Illinois 60649
- 4533-47 South Calumet Avenue, Chicago, Illinois 60653
- 4611-17 South Drexel Boulevard, Chicago, Illinois 60653
- 431 East 42nd Place, Chicago, Illinois 60653

Along with other promotional efforts, the Receiver advertised these properties for public bid for four consecutive weeks between July 6 and July 27, 2020, with an August 5, 2020 deadline for the submission of offers. The Receiver entered purchase and sale agreements for each of these properties, and on October 5, 2020 filed the Tenth Motion to Confirm the Sale of these properties. (Docket No. 809)

The Receiver and his professionals also continued to assemble due diligence folders containing third-party property reports, photographs, repair estimates, bids, utility bills, surveys, and trailing twelve-month profit-and-loss statements for each of the 37 properties (consisting of four dwelling units or less) for which the Court approved a portfolio sale (Docket No. 682). The Receiver expects that SVN SFRhub, its real estate broker, will soon commence the marketing of the portfolio and is aiming to conclude the marketing and sales process early in the First Quarter of 2021.On June 11, 2020, the Receiver filed his Eighth Motion to Confirm the Sale of Certain Real Estate (Docket No. 712):

• 7600-10 South Kingston, Chicago IL 60649

- 7656-58 South Kingston, Chicago IL 60649
- 6949-59 South Merrill Ave, Chicago IL 60649

Objections to the Receiver's Eighth Motion to Confirm the Sale of these three properties were filed by Liberty EBCP, LLC and Thorofare Assed Based Lending Reit Fund IV, LLC on July 2, 2020 (Docket Nos. 728, 730), and on July 10, 2020, the Court granted several motions to intervene filed by Ventus Holdings, LLC, Pioneer Acquisitions, LLC, and Southside Property Group, LLC, allowing these intervenors to file responses in support of the motion. (Docket No. 742) These objections and responses were fully briefed as of July 17, 2020 (*see* Docket Nos. 728, 730, 739, 746, 747, 748, 763, 772.

On July 24, 2020, the Receiver filed his Ninth Motion to Confirm the Sale (Docket No. 749) of the following properties:

- 7201 S Constance Ave/ 1825-31 E 72nd Street, Chicago IL 60649 (20-25-119-001-0000)
- 7201-07 S Dorchester Ave/ 1401 E 72nd St. Chicago IL 60619 (20-26-210-001-0000)
- 7953-59 S Marquette Rd / 2708-10 E 80th St, Chicago IL 60617 (21-31-106-024-0000)
- 7051 S Bennett Ave, Chicago IL 60649 (20-24-328-011-0000)
- 6250 S Mozart St/ 2832-36 W 63rd St, Chicago IL 60629 (19-13-330-038-0000)
- 6356 S California Ave / 2804 W 64th St, Chicago IL 60629 (19-24-107-037-0000)
- 2736-44 W 64th Street, Chicago IL 60629 (19-24-200-029-0000)
- 6355-59 S Talman Ave / 2616-22 W 64th St, Chicago IL 60629 (19-24-203-023-0000)
- 1131-41 E 79th Place, Chicago IL 60619 (20-35-106-022-0000)
- 7836 S Shore Drive / 3074 Cheltenham Place, Chicago IL 60649 (21-30-414-040-0000)
- 7508 S Essex Avenue / 2453-59 E 75th Street, Chicago IL 60649 (21-30-301-030-0000)
- 5618-20 S Martin Luther King Drive, Chicago IL 60637 (20-15-112-018-0000 and 20-15-112-019-0000)
- 6558 S Vernon Ave / 416-24 E 66th Street, Chicago IL 60637 (20-22-216-038-0000 and 20-22-216-039-0000)

An objection to the sale of two of these properties—1131-41 E 79th St. and 6250 S Mozart—was filed by Certain Mortgagees on August 24, 2020 (Docket No. 769). The Receiver responded to these objections on September 15, 2020 (Docket No. 790). On September 25, 2020,

the Court entered an Amended Order Partially Granting the Ninth Sales Motion as to the remaining 12 of the 14 properties addressed in the motion. (Docket No. 802) As of September 30, eight of these twelve properties had closed.<sup>2</sup>

#### iii. Financial Reporting and Rents Restoration

During the Third Quarter 2020, the Receiver continued to provide institutional lenders with monthly accounting relating to rents generated by, and expenses incurred in connection with, the properties on which they assert liens. To that end, monthly reports have been sent to lenders' counsel covering the periods January through April 2020. The Receiver and his retained professionals additionally generated monthly reports for properties not encumbered by institutional debt during this period. Reports for each property include the following information:

(a) net operating income, (b) expenditures made by the Receiver for the benefit of the property (primarily for insurance, real estate taxes, and funds sent to the property manager to cover expenses not payable through operating income), (c) net income distributed to the Receiver or to other property accounts from which funds were previously borrowed, and (d) a computation of the amount (if any) of rentals remaining to be restored to the property pursuant to the February 13, 2019 Order. (Docket No. 223) Each report also includes a computation of the cumulative amount (if any) reimbursable from each property, representing the amount that has been expended for the benefit of the property from sources other than its operating income.

Each report is sent with a detailed explanation of the contents of the related report and the calculation of rentals to be restored. Examples of these reports were attached as exhibits 3-26 to

<sup>&</sup>lt;sup>2</sup> After the close of the third quarter, the Court granted the Receiver's Eighth Sales motion and the remainder of the Receiver's Ninth Sales motion (Dkt. No. 825), leading to two notices of the appeal of that order being filed in the Seventh Circuit. As of the date of this filing, the sales of the five properties implicated by these two motions are on hold.

a motion filed by the Receiver regarding the use of sales proceeds for rent restoration. (Docket No. 749). For properties where no rent restoration is due, the final line item on the report reflects an amount that has been expended for the benefit of the property from sources other than operating income on that property.

During the Third Quarter 2020, the Receiver filed his Second Motion for Restoration of Funds Expended for the Benefit of Other Properties, seeking the Court's approval to use proceeds from the sale of those properties on which the Receiver expended funds in excess of rents (a) for the purpose of rent restoration in accordance with the Court's Order of February 13, 2019, and (b) to reimburse the Receivership for any remaining reimbursable amount in excess of such rent restoration. (Docket No. 749) Two objections to the Receiver's motion were filed by "the Indiana/Yates Mortgagees" (Docket No. 764) and by Midland Loan Services (Docket No. 766). The latter objections were resolved by agreement, and the Receiver responded to the former objections (concerning two properties, one at 5450-52 S. Indiana and the other at 7749 S. Yates) on September 15, 2020. (Docket No. 791) On September 18, 2020, the Court granted the portion of the Second Restoration Motion for the remaining properties not subject to the Objections (Docket No. 796). In accordance with the Court's Order, the Receiver transferred \$391,830.42 to the properties due funds under the Court's prior order (Docket No. 223), after which the total \$767,192.75 of rent to be restored pursuant to the Court's February 13, 2019 order (Docket No. 223) has been restored. As part of the same restoration of funds, the Receiver's account was reimbursed \$1,047,972.77 for expenses that had been paid for the benefit of the sold properties, to

be available to pay ongoing and approved administrative fees and expenses of the Receivership Estate.<sup>3</sup>

#### iv. Open Litigation

Settlement of the matter captioned *Foley v. EquityBuild, Inc.*, Case No. 16 L 8903, Circuit Court of Cook County, was finalized during the Third Quarter 2020, and the matter was dismissed on September 24, 2020.

During the Third Quarter 2020, a settlement was reached in the matter captioned *Barnes v*. *EquityBuild, et al.*, Case No. 19 L 7852, Circuit Court of Cook County, and a dismissal order was entered. A settlement and release agreement was executed on November 17, 2020.

Discovery has proceeded in the matter captioned *Byrd v. EquityBuild et al.*, Case No. 18 L 1993, Circuit Court of Cook County, with additional written discovery completed during the quarter. Depositions of medical witnesses have been completed, and three fact witnesses remain to be deposed. The matter has been set for a mandatory pre-trial hearing on November 6, 2020, and it is anticipated that the court will set a final deadline for the completion of fact and expert discovery if the case is not settled on that date

A claim brought by a tenant of 4520 S Drexel Avenue was settled by the insurance carrier during the quarter without a lawsuit having been filed, resulting in a \$25,000 deductible payment owed.

The Receiver also received notice of a personal injury claim made by a tenant for injuries allegedly sustained at 7114 S Cornell on August 9, 2020. The Receiver's counsel has provided

<sup>&</sup>lt;sup>3</sup> Following the close of the third quarter, the Court overruled the objections of the "Indiana/Yates Mortgagees" and entered an order granting the remainder of the Receiver's Second Restoration Motion. (Dkt. Nos. 825, 843)

notice of the receivership to the tenant's lawyer and notice of the claim to the institutional lender's counsel.

The stay entered in the matter of *Markwell v. EquityBuild, Inc.*, Case No. 2018-13722, pending in the 165<sup>th</sup> Judicial District, Harris County, Texas has been extended.

#### v. Notice of Appointment of Receiver

During the Third Quarter 2020, the Receiver continued his efforts to notify all necessary and relevant individuals and entities of the appointment and to protect and preserve the assets of the Receivership Estate. To that end, as they are identified, the Receiver continues to deliver notices to individuals or entities which have been identified as potentially having possession of the property, business, books, records, or accounts of the Receivership Defendants, or who may have retained, managed, held, insured, or encumbered, or had otherwise been involved with any of the assets of the Receivership Defendants.

#### vi. Control of Receivership Property and Records

During the Third Quarter 2020, the Receiver continued efforts to locate and preserve all EquityBuild property and records. The Receiver maintained two platforms of records and data during the Third Quarter 2020.

#### vii. Factual Investigation

During the Third Quarter 2020, the Receiver and his retained professionals continued to review and analyze the following: (i) documents and correspondence sent to or received from the EquityBuild principals, to whose email accounts the Receiver has access; (ii) bank records from EquityBuild and its affiliate entities; (iii) EquityBuild documents (largely stored in cloud-based and other electronic media, plus a limited number of hard copy records); (iv) available underlying

transaction documents received to date from former Chicago-based EquityBuild counsel; and (v) files produced by former EquityBuild counsel, accountants, and employees.

During the Third Quarter 2020, the Receiver and his retained counsel continued to evaluate potential third-party claims. In that regard, the Receiver has retained additional counsel and worked with a consultant (a consulting fee in the amount of \$5,000 for the latter is reflected on the July special counsel invoice). Additionally, on August 17, 2020, the Receiver filed a lawsuit in the Circuit Court of Cook County's Law Division against certain of EquityBuild's former lawyers: (1) the law firm Rock Fusco & Connelly LLC, (2) Ioana Salajanu, a lawyer formerly at Rock Fusco, and (3) the law firm Bregman, Berbert, Schwartz & Gilday, LLC, alleging professional malpractice as well as aiding and abetting the Cohen's breaches of their fiduciary duties.

#### viii. Tax Issues

Whitley Penn was retained to continue its work in preparation of 2016 and 2017 tax returns for Receivership entities for which returns were not previously filed. During the Third Quarter 2020, Whitley Penn provided draft tax returns to the Receiver on June 30, 2020 and July 31, 2020. At the Receiver's request, Whitley Penn filed nine of these returns on August 13, 2020.

BrookWeiner was retained to perform accounting, tax, and related work in connection with winding down the business operations of the Receivership Defendants. BrookWeiner also has compiled monthly property statements and property spreadsheets and assisted with cash flow analysis matters. In addition, during the Third Quarter 2020, BrookWeiner also assisted with reviewing and preparing other returns for 2017. The Receiver does not plan to issue Form K-1s for 2016 and 2017.

#### ix. Accounts Established by Receiver for the Benefit of the Receivership Estate

The Receiver established custodial accounts at a federally insured financial institution to hold all cash equivalent Receivership property. The interest-bearing checking accounts are used by the Receiver to collect liquid assets of the estate and to pay the portfolio-related and administrative expenses. For each property encumbered by secured debt that has sold, the Receiver also has established a separate interest-bearing account for the purpose of depositing and holding funds until such time as the Court orders otherwise and for ultimate distribution, following a claims process and upon Court approval, to the creditors of the Estate, including the defrauded investors. (Docket Nos. 230, 311, 344 & 346)

#### c. Creditors and Claims Against the Receivership Estate

During the Third Quarter 2020, the Receiver and his retained professionals continued to improve the accuracy and completeness of the "Master Claims Exhibit," preliminarily identifying on a property-by-property basis for each of the nearly 2400 claims the following: (i) claimant name, (ii) total amount claimed, (iii) claimant category, and (iv) the amount loaned or invested in the particular property (where it could be determined from the face of the claim form). The Receiver has encouraged claimants to review this exhibit and bring any discrepancies to the attention of the Receiver, and the Receiver and his retained professionals have updated the exhibit where appropriate. The most recent version of the Master Claims Exhibit was submitted with the Receiver's Third Quarter 2020 Status Report. (Docket No. 839 at Ex. 8). This work was reasonable, necessary, and beneficial to the receivership estate, and has allowed the Receiver's claims vendor to organize, on a property-by-property basis, the claim forms and supporting documentation that claimants have submitted to the Receiver, so that once a claims process and confidentiality order are approved by the Court, digital links for the transfer of claims and

supporting documentation from other claimants asserting claims against the same property can be provided to each claimant on a property-by-property basis consistent with Court orders.

The identification and compilation of claims submitted in this matter has been complex and time-consuming due to the unique circumstances and facts in this case. For example, it appears that in some instances anticipated proceeds of investor-lender loans rolled into new offerings rather than being paid off at maturity. It also appears that in some circumstances the mortgages securing loans may have been released without investor-lenders' knowledge or consent, allowing the Defendants to refinance the properties with new loans without retiring the existing loans. Moreover, some investor-lenders may have been induced to exchange secured loans for unsecured loans or equity positions through false representations. Additionally, claims against many properties are complicated by cross-collateralized mortgages.

The claims process has been further complicated by, among other things: (i) improperly completed proofs of claim, (ii) claims relating to properties that were conveyed to third parties prior to the establishment of the Receivership; and (iii) claims lacking reference to properties, or relating solely to what appear to be equity investment vehicles.

Much of the Receiver's and his counsel's time during the Third Quarter 2020 was devoted to the establishment of a claims process and responding to objections raised by the institutional lenders to the process proposed by the Receiver in his February 28, 2020 motion which remains pending before the Court. (Dkt. No. 638) The Receiver and his counsel participated in two extensive status conferences during the quarter (on July 15, 2020 and September 23, 2020), and, at the Court's direction, worked with counsel for the institutional lenders on the preparation of a set of standard document requests and interrogatories directed to investors and a set of standard document requests and interrogatories directed to institutional lenders. To a more limited extent,

the Receiver's counsel also worked with counsel for the institutional lenders on a plan for making the EquityBuild documents electronically available to all claimants.

The Receiver is continuously updating all claimants on the developments in this matter, and responding in a timely manner to the hundreds of emails and voicemails from investors and others, many if not most of which related to the claims submitted against the Estate and the status of the Court's process for resolving those claims and distributing the Estate's assets. To ease the burden and provide basic information, the Receiver established a web page (http://rdaplaw.net/receivership-for-equitybuild) for claimants and other interested parties to obtain information and certain court filings related to the Receivership estate, which remains in place today and continues to be best and most cost-effective mean of providing information regarding the status of this action.

#### d. Assets in Receivership Estate

All known Receivership Property is identified and described in the Master Asset List attached hereto as **Exhibit D.** The Master Asset List identifies 56 checking accounts in the names of the affiliates and affiliate entities included as Receivership Defendants, reflecting a total amount transferred to the Receiver's account of \$128,936.37. (*See also* Docket No. 258 at 21, and Docket No. 348 at 23-24, for additional information relating to these funds.) Additionally, 79 separate interest-bearing accounts established by the Receiver to hold the proceeds from sold real estate are identified on **Exhibit E**.

The Master Asset List does not include funds received or recovered after September 30, 2020. Nor does it include potentially recoverable assets for which the Receiver is still evaluating the value, potential value, and/or ownership interests. The Receiver is in the process of evaluating certain other types of assets that may be recoverable by the Receivership Estate, including, but not

limited to, charitable donations, loans, gifts, settlements for which payment has not yet been received, and *other* property transferred to family members, former employees, and others.

e. *See also* Receiver's Ninth Status Report (Third Quarter 2020) for additional information. (Docket No. 839)

#### IV. BILLING ADDRESSED IN THIS APPLICATION

- 11. Pursuant to the Billing Instructions, the Receiver provides the following information regarding current billing:
  - a. <u>Total Compensation and Expenses Requested.</u>
  - i. In connection with his duties, the Receiver respectfully requests compensation for services rendered, totaling \$93,678.00 for the period of this Application. Copies of the Receiver's invoices for July, August and September, 2020 are attached as **Exhibit F.**
  - ii. In connection with the legal services provided to the Receiver by RDP, the Receiver respectfully requests compensation for services rendered, along with reimbursement of expenses, totaling \$291,759.43 for the period of this Application. Copies of RDP's invoices for July, August and September, 2020 are attached as <a href="Exhibit G.">Exhibit G.</a> Additionally, Receiver's counsel Andrew Porter received \$29,108 as agency fees for the title examination work performed in connection with the closing of properties during the Third Quarter 2020. The Receiver will reduce the amount due to RDP for the Third Quarter 2020 by this amount.
  - iii. In connection with the accounting provided to the Receiver by

    BrookWeiner, the Receiver respectfully requests compensation for services

- rendered, along with reimbursement of expenses, totaling \$8,118.00 for the period of this Application. Copies of BrookWeiner's invoices for July, August and September, 2020, are attached as **Exhibit H.**
- iv. In connection with the accounting provided to the Receiver by Whitley Penn, the Receiver respectfully requests compensation for services rendered, along with reimbursement of expenses, totaling \$37,470.80 for the period of this Application. Copies of Whitley Penn's invoices for July, August and September, 2020, are attached as **Exhibit I.**
- v. In connection with the database services provided to the receiver by Axos, the Receiver respectfully requests compensation for services rendered, along with reimbursement of expenses, totaling \$128.75 for the period of this Application. A copy of Axos' invoice is attached as **Exhibit J.**
- vi. In connection with the IT services provided to the Receiver by Prometheum, the Receiver respectfully requests compensation for services rendered, along with reimbursement of expenses, totaling \$1,017.50 for the period of this Application. A copy of Prometheum's invoice is attached as **Exhibit K.**
- b. <u>Source of Funds for Requested Compensation and Expenses</u>. The Receiver requests that the above compensation and expenses be paid from the Receiver's operating account to the extent there are sufficient funds now or in the future. To the extent funds are insufficient, Receiver requests that the above compensation and expenses be paid pursuant to the receiver's lien that the Court established in order that receivership

property may be used to compensate the Receiver and his counsel for their work. (*See* Court's 10/26/20 Order granting Receiver's lien (Dkt. 824))

- c. <u>Ninth Application for Payment of Professional Fees and Expenses</u>. This is the Receiver's ninth interim application.
- d. <u>Summary of Activity</u>. A "Summary of Activity," providing the total hours billed and the amount of billing for each person who billed time during the Application period (July 1, 2020 through September 30, 2020) can be found at the end of the Receiver's invoices (Exhibit F) and RDP's invoices (Exhibit G) and on the first page of the BrookWeiner and Axos invoices (Exhibits H and J).

#### V. REQUEST FOR RECEIVER'S LIEN

12. This Court has previously granted a receiver's lien and its previously ruling is equally applicable here. (Docket No. 824) Consistent with the reasons set forth in the Receiver's prior fee applications and other requests and the Court's prior ruling, a receiver's lien on the estate assets and their proceeds to pay costs of the Receiver and his retained professionals that were incurred for the benefit of those properties and their competing claimants is appropriate. (*See, e.g.,* Docket No. 778, at 18-25; Docket No. 638, ¶¶ 53-57; Docket No. 720, at 14-20; Docket No. 755). The Receiver believes that the receiver's lien and the allocation methodology previously approved by the Court is reasonable and equitable given the facts, circumstances, and practical challenges of the receivership. Consistent with this approach, the Receiver requests a lien against each property to be paid on a first priority basis before all other liens on the properties to ensure that all Court-approved fees and expenses of the Receiver and the Retained Professionals are paid in accordance with the foregoing proposed methodology.

#### V. CONCLUSION

WHEREFORE, the Receiver respectfully requests that the Court approve the Receiver's Ninth Interim Fee Application and enter an Order as follows:

- a. Finding the fees and expenses of the Receiver and Receiver's retained professionals, Rachlis Duff & Peel LLC, BrookWeiner, LLC, Whitley Penn, Axos Financial Services, and Prometheum, as described in Exhibits F-K, respectively, to be reasonable and necessary to the Receivership;
- b. granting the Receiver and his retained professional a first priority administrative lien against each of the real estate properties in the Receivership Estate and their sales proceeds for payment of fees and costs;
- c. approve the proposed allocation and payment methodology with respect to a Receiver's lien for all fees and expenses of the Receivership Estate as described and recommended in this fee application;
- d. approving the Receiver's payment of such fees and expenses to the Receiver and to Receiver's retained professionals from sales proceeds for each of the properties in the Receivership Estate as described and recommended in this fee application; and
  - e. granting the Receiver all other relief which this Court deems just and proper.

The SEC has reviewed and indicated it approves this Application, together with all exhibits.

Dated: November 30, 2020 Kevin B. Duff, Receiver

> By: /s/ Michael Rachlis

> > Michael Rachlis Jodi Rosen Wine Rachlis Duff & Peel, LLC

542 South Dearborn Street, Suite 900

Chicago, IL 60605

Phone (312) 733-3950; Fax (312) 733-3952

mrachlis@rdaplaw.net jwine@rdaplaw.net

#### **RECEIVER'S CERTIFICATION**

- 1. Pursuant to the Billing Instructions, the Receiver certifies as follows regarding the Receiver's Ninth Interim Application and Motion for Court Approval of Payment of Fees and Expenses of Receiver and Receiver's Retained Professionals:
  - a. The Receiver has read the foregoing Application and Motion.
  - b. To the best of the Receiver's knowledge, information and belief formed after reasonable inquiry, the Application and Motion and all fees and expenses therein are true and accurate and comply with the Billing Instructions (with any exceptions specifically noted in this Certification, Application, and Motion);
  - c. All fees contained in the Application and Motion are based on the rates listed in the Fee Schedule attached hereto as Exhibit A, and such fees are reasonable, necessary, and commensurate with the skill and experience required for the activity performed;
  - d. The Application and Motion does not include in the amount for which reimbursement is sought, the amortization of the cost of any investment, equipment, or capital outlay (except to the extent any such amortization is included within the permitted allowable amounts set forth herein);
  - e. In seeking reimbursement for a service which the Receiver or the Receiver's Retained Professionals justifiably purchased or contracted for from a third party (such as copying, imaging, bulk mail, messenger service, overnight courier, computerized research, or title and lien searches), reimbursement is requested only for the amount billed to the Receiver or Receiver's Retained Professionals by the third-party vendor and paid by the Receiver or Receiver's Retained Professionals to such vendor. If such services were performed by the Receiver or Receiver's Retained Professionals, the Receiver certifies that no profit has been made on such reimbursable service.
  - 2. On November 24, 2020, the Receiver provided to Mr. Benjamin Hanauer, of the SEC, a complete draft copy of this Application and Motion, together with all exhibits and relevant billing statements in a format specified by the SEC.

/s/ Kevin B. Duff

Kevin B. Duff, Receiver EquityBuild, Inc., et al. c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605 (312) 733-3390 - kduff@rdaplaw.net

# Exhibit A

## Rachlis Duff & Peel, LLC Rates

Professional/	Position	2020	2020
Paraprofessional		Standard	Discounted
		<b>Hourly Rates</b>	<b>Hourly Rates</b>
Michael Rachlis	RDP Member	\$575	\$390
Drew G.A. Peel	RDP Member	\$575	\$390
Ellen Duff	RDP Of Counsel	\$575	\$390
Andrew E. Porter	RDP Of Counsel	\$575	\$390
Jodi Rosen Wine	RDP Of Counsel	\$575	\$260
Kathleen Pritchard	RDP Paralegal	\$195	\$140
Ania Watychowicz	RDP Paralegal	\$195	\$140
Justyna Rak	RDP Paralegal	\$195	\$140
Stoja Zjalic	RDP Legal Assistant	\$160	\$110

BrookWeiner Billing Rates

20% discount from current standard rates

Staff Accountant\$110/hourManager\$210/hourPartner\$275/hour

## Whitley Penn Accounting Rates

	Standard	20%
		Discount
Accounting Services Staff	\$165	\$132
Accounting Services Senior	\$170	\$136
Accounting Services Manager	\$175	\$140
Tax Staff	\$185	\$148
Tax Senior	\$210	\$168
Tax Manager	\$250	\$200
Tax Senior Manager	\$310	\$248
Tax Partner	\$425	\$340

## Axos Financial Services

Professional	Position	Hourly Rates
Gena Sullivan	Project Manager	\$80.00
Cheryl Bender	IT/Programming	\$100.00
Tracey McMahan	Data Entry	\$45.00
Joanna Croney	Data Entry	\$45.00

## Prometheum's Hourly Rate

Position	<b>Hourly Rate</b>	
Senior Technical Consultant	\$110	

# Exhibit B

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Interim Fee Application	Docket No. Application	Date Filed	Amount Applicati	of ion	Docket No. Order	Date of Order	Amou	nt Approved	Amount		Am	proved ount Unpaid of 9/30/20)
First (3d Q 2018)	411	June 12, 2019	\$	413,298.44	546	October 15, 2019	\$	413,298.44	\$	413,298.44	\$	-
Second (4th Q 2018)	487	August 21, 2019	\$	553,968.43	547	October 15, 2019	\$	553,968.43	\$	553,968.43	\$	-
Third (1st Q 2019)	569	November 1, 2019	\$	547,711.44	614	January 7, 2020	\$	547,711.44	\$	547,711.44	\$	-
Fourth (2d Q 2019)	576	November 15, 2019	\$	499,214.42	614	January 7, 2020	\$	499,214.42	\$	23,008.66	\$	476,205.76
Fifth (3d Q 2019)	608	December 20, 2019	\$	485,094.92	710	June 9, 2020	\$	485,094.92	\$	5,290.00	\$	479,804.92
Sixth (4th Q 2019)	626	February 14, 2020	\$	297,791.41	710	June 9, 2020	\$	297,791.41	\$	3,965.00	\$	293,826.41
Seventh (1st Q 2020)	755	July 28, 2020	\$	362,102.16	824	October 26, 2020	\$	362,102.16		n/a	\$	362,102.16
Eighth (2d Q 2020)	778	August 28, 2020	\$	451,944.97	824	October 25, 2020	\$	451,944.97	·	n/a	\$	451,944.97
											\$	2,063,884.22

# Exhibit C

# STANDARDIZED FUND ACCOUNTING REPORT for EQUITYBUILD, INC., et al. - Cash Basis Receivership; Civil Court Docket No. 18-cv-05587 Reporting Period 7/1/2020 to 9/30/2020

. 4114 /1000	nting (See Instructions):	Detail	Culetatal	Cuond Tatal
Line 1	Paginning Palance (Ac of 7/4/2020).	<u>Detail</u>	Subtotal	Grand Total
Line 1	Beginning Balance (As of 7/1/2020):	\$258,592.90		\$258,592.90
	Increases in Fund Balance:			
Line 2	Business Income			
Line 3	Cash and unliquidated assets			
Line 4	Interest/Dividend Income <sup>1</sup>	\$250.38		
Line 5	Business Asset Liquidation			
Line 6	Personal Asset Liquidation			
Line 7	Net Income from Properties			
Line 8	Miscellaneous - Other <sup>2</sup>	\$1,446,447.86		
	Total Funds Available (Line 1-8):			\$1,705,291.14
	Decrease in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for receivership operations			
Line 10a	Disbursements to receiver or Other Profesionals			
Line 10b	Business Asset Expenses <sup>3</sup>	(\$538,063.82)		
Line 10c	Personal Asset Expenses			
Line 10d	Investment Expenses			
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees			
	2. Litigation Expenses			
	Total Third-Party Litigation Expenses		\$0.00	
Line 10f	Tax Administrator Fees and Bonds			
Line 10g	Federal and State Tax Payments			
	Total Disbursements for Receivership Operations		(\$538,063.82)	
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	Distribution Plan Development Expenses:			
	1. Fees:			
	Fund Administrator			
	Independent Distribution Consultant (IDC)			
	Distribution Agent			
	Consultants			
	Legal Advisers			
	Tax Advisers			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses		\$0.00	
Line 11b	Distribution Plan Implementation Expenses:		+3.30	
Line 110	1. Fees:			
	1. Fees: Fund Administrator			
	IDC			

# STANDARDIZED FUND ACCOUNTING REPORT for EQUITYBUILD, INC., et al. - Cash Basis Receivership; Civil Court Docket No. 18-cv-05587 Reporting Period 7/1/2020 to 9/30/2020

	Distribution Agent			
	Consultants			
	Legal Advisers			
	Tax Advisers	•		
	2. Administrative Expenses			
	3. Investor identification			
	Notice/Publishing Approved Plan			
	Claimant Identification			
	Claims Processing			
	Web Site Maintenance/Call Center			
	4. Fund Adminstrator Bond			
	5. Miscellaneous			
	6. Federal Account for Investor Restitution			
	(FAIR) reporting Expenses			
	Total Plan Implementation Expenses			
	Total Disbursement for Distribution Expenses Paid by the	e Fund	\$0.00	
Line 12	Disbursement to Court/Other:			
Line 12a	Investment Expenses/Court Registry Investment			
	System (CRIS) Fees			
Line 12b	Federal Tax Payments			
	Total Disbursement to Court/Others:			
	Total Funds Disbursed (Lines 1-9):			\$1,167,227.32
Line 13	Ending Balance (As of 9/30/2020):			\$1,167,227.32
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents			\$1,167,227.32
Line 14b	Investments (unliquidated Huber/Hubadex investments)			
Line 14c	Other Assets or uncleared Funds			
	Total Ending Balance of Fund - Net Assets			\$1,167,227.32

<sup>&</sup>lt;sup>1</sup> Includes credited interest previously withheld in error.

Receiver:

<sup>\*</sup>Refund of insurance premium financing payments for sold properties - \$6,644.67; funds transfers from property accounts per 9/21/20 Court order (Dkt 796) on second motion for restoration - \$1,439,803.19; TOTAL: \$1,446,447.86

<sup>&</sup>lt;sup>3</sup> Insurance (\$123,029.26); property maintenance (\$500.00); property utilities (\$17,177.18); property security installations (\$5,526.96); funds transfers to property accounts per 9/21/20 Court order (Dkt 796) on second motion for restoration (\$391,830.42): TOTAL \$538,060.82.

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STANDARDIZED FUND ACCOUNTING REPORT for EQUITYBUILD, INC., et al. - Cash Basis
Receivership; Civil Court Docket No. 18-cv-05587
Reporting Period 7/1/2020 to 9/30/2020

	/s/ Kevin B. Duff				
	(Signature)				
	Kevin B. Duff, Receiver EquityBuild, Inc., et al.				
	(Printed Name)				
Date:	October, 2020				

# Exhibit D

#### **Master Asset List**

Receiver's Account (as of 9/30/2020)				
Institution	<b>Account Information</b>	Amount		
AXOS Fiduciary Services	Checking #0181	\$1,040,573.76		
AXOS Fiduciary Services	Checking #0348	\$126,653.56		
		Total:		
		\$1,167,227.32		

	Receivership Defendants' Accounts					
Institution	Account Information	<b>Current Value</b>	<b>Amount Transferred</b>			
			to Receiver's			
			Account			
Wells Fargo	Checking (53 accounts in the names of the		\$190,184.131			
	affiliates and affiliate entities included as					
	Receivership Defendants)					
Wells Fargo	Checking (account in the names of Shaun		\$23,065.432			
	Cohen and spouse)					
Byline Bank	Checking (2 accounts in names of Receivership	\$21,828.733				
	Defendants)					
			Total:			
			\$128,936.37			

### **EquityBuild Real Estate Portfolio**

For a list of the properties within the EquityBuild portfolio identified by property address, alternative address (where appropriate), number of units, and owner, *see* Exhibit 1 to the Receiver's First Status Report, Docket No. 107. See also Exhibit 7 hereto.

Other, Non-Illinois Real Estate			
Description	Appraised Market Value		
Single family home in Plano, Texas	±\$450,000.00		
	Approximate mortgage amount: \$400,000.00 Approximate value less mortgage: \$50,000.00		

<sup>&</sup>lt;sup>1</sup> This amount reflects the total value of all of the frozen bank accounts held by Wells Fargo that were transferred to the Receiver's account; the final transfer was made on 1/22/20, and included as part of the Receiver's Account as of 3/31/20.

<sup>&</sup>lt;sup>2</sup> This amount was transferred to the Receiver's Account as of 8/27/18, and is included as part of the total balance of the Receiver's Account as of 3/31/19.

<sup>&</sup>lt;sup>3</sup> The Receiver is investigating whether these accounts are properly included within the Receivership Estate.

# Exhibit E

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SEC v. EquityBuild, Inc., et al. No. 18-cv-5587

Account Number	Account Name	Account Balance (as of September 30,	Date of Settlement	Reason for Change (if any) 7/1/20 - 9/30/20	
0025	7301 S Stewart Ave	<b>2020)</b> \$302,484.66	11/4/2019	Credited interest previously withheld in error, \$68.76; interest earned, \$190.02	
0033	5001-05 S Drexel	\$2,717,615.13		Credited interest earned, \$150.02  Credited interest previously withheld in error, \$606.22; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$50,975.22; interest earned, \$1,677.25	
0041	7927-49 S Essex	\$642,464.92	5/1/2019	Credited interest previously withheld in error, \$163.43; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$76,458.12); interest earned, \$448.50	
0058	8100-14 S Essex	\$926,017.50	4/30/2019	Credited interest previously withheld in error, \$210.51; interest earned, \$581.72	
0066	6160-6212 S King	\$428,587.19		Credited interest previously withheld in error, \$113.11; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$69,003.13); interest earned, \$309.76	
0108	8047 S. Manistee	\$806,440.70		Credited interest previously withheld in error, \$197.85; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$64,708.76); interest earned, \$544.60	
0116	5955 S. Sacramento	\$448,704.90		Credited interest previously withheld in error, \$113.86; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$52,169.06); interest earned, \$312.51	
0124	6001-05 S. Sacramento	\$326,831.11	11/5/2019	Credited interest previously withheld in error, \$87.84; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$59,612.38); interest earned, \$240.32	
0132	7026-42 S. Cornell	\$865,431.05	11/6/2019	Credited interest previously withheld in error, \$220.49; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$103,558.90); interest earned, \$604.48	
0157	7834-44 S. Ellis	\$1,631,506.61	11/4/2019	Credited interest previously withheld in error, \$379.00; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$35,670.13); interest earned, \$1,045.85	
0165	701-13 S. 5th Avenue	\$454,595.62		Credited interest previously withheld in error, \$118.99; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$71,698.88); interest earned, \$327.68	
0199	7625 S. East End	\$1,237,884.20	12/20/2019	Credited interest previously withheld in error, \$276.76; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$20,481.98; interest earned, \$765.60	

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#### SEC v. EquityBuild, Inc., et al. No. 18-cv-5587

Account Number	Account Name	Account Balance (as of September 30, 2020)	Date of Settlement	Reason for Change (if any) 7/1/20 - 9/30/20
0207	7635 S. East End	\$1,045,613.10	12/20/2019	Credited interest previously withheld in error, \$255.92; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$80,156.49); interest earned, \$703.92
0215	7748 S. Essex	\$1,168,392.43	12/18/2019	Credited interest previously withheld in error, \$278.13; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$55,082.59); interest earned, \$766.32
0223	7750 S. Muskegon	\$408,281.87	12/18/2019	Credited interest previously withheld in error, \$136.68; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$192,999.06); interest earned, \$369.82
0231	7749-59 S. Yates	\$786,493.29	4/22/2020	Credited interest previously withheld in error, \$103.59 interest earned, \$494.08
0249	7450 S. Luella	\$186,018.67	5/7/2020	Credited interest previously withheld in error, \$21.81; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$25,504.73); interest earned, \$131.84
0256	4520-26 S. Drexel	\$5,879,918.74	5/21/2020	Credited interest previously withheld in error, \$444.85; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$60,392.70; interest earned, \$3,658.35
0264	6749-59 S. Merrill	\$1,397,330.72	4/28/2020	Credited interest previously withheld in error, \$166.83; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$11,426.32; interest earned, \$871.10
0272	7110 S. Cornell	\$1,145,959.64	8/13/2020	Proceeds of 8/13/20 property sale, \$1,145,576.16; interest earned, \$383.48
0314	8201 S. Kingston	\$279,028.79	5/21/2020	Credited interest previously withheld in error, \$23.97; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$34,630.20); interest earned, \$195.62
0322	8326-58 S. Ellis	\$1,308,457.86	6/11/2020	Credited interest previously withheld in error, \$53.67; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$95,837.14); interest earned, \$878.27
0355	7546 S. Saginaw	\$510,295.08	5/13/2020	Credited interest previously withheld in error, \$49.39; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$27,330.94); interest earned, \$337.54
0363	638 N. Avers	\$280,817.95	n/a	Insurance settlement for fire damage, \$294,328.19; payment of 2019 property taxes to Cook County Treasurer, \$13,642.01; interest earned, \$131.77
0371	5450 S. Indiana	\$1,657,713.29	6/25/2020	Credited interest previously withheld in error, \$19.06; interest earned, \$1,044.25

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#### SEC v. EquityBuild, Inc., et al. No. 18-cv-5587

Account Number	Account Name	Account Balance (as of September 30, 2020)	Date of Settlement	Reason for Change (if any) 7/1/20 - 9/30/20
0389	6437 S. Kenwood	\$1,316,403.44	6/25/2020	Credited interest previously withheld in error, \$12.63; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$1,794.26); interest earned, \$830.31
0397	7300 S. St. Lawrence	\$283,365.96	7/27/2020	Proceeds of 7/27/20 property sale, \$283,239.84; interest earned, \$126.12
0405	7760 S. Coles	\$120,530.461	6/26/2020	Credited interest previously withheld in error, \$1.80; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$67,787.76); interest earned, \$115.84
0413	8000 S. Justine	\$184,367.77	6/26/2020	Credited interest previously withheld in error, \$1.13; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$113,597.64); interest earned, \$183.04
0421	8107-09 S. Ellis	\$94,856.83	6/30/2020	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$80,850.18); interest earned, \$101.34
0439	8209 S. Ellis	\$253,183.15	7/1/2020	Proceeds from 7/1/20 sale of property, \$308,848.22; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$55,846.86); interest earned, \$181.79
0447	8214-16 S. Ingleside	\$204,565.33	6/30/2020	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$62,821.55); interest earned, \$167.69
0454	11117 S. Longwood	\$1,588,101.54	7/8/2020	Proceeds from 7/8/20 sale of property, \$1,599,854.81; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$12,684.43); interest earned, \$931.16
0488	2736 W. 64th	\$373,125.53	9/29/2020	Proceeds from 9/29/20 sale of property, \$373,122.98; interest earned, \$2.55
0496	3074 Cheltenham	\$960,394.42	9/24/2020	Proceeds from 9/24/20 sale of property, \$960,348.38; interest earned, \$46.04
0504	5618 S. Martin Luther King	\$600,685.21	9/29/2020	Proceeds from 9/29/20 sale of property, \$584,772.08; funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, (\$15,908.48); interest earned, \$4.65
0512	6250 S. Mozart	\$19,657.69	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$19,656.89; interest earned, \$0.80
0520	6355 S. Talman	\$472,142.79	9/29/2020	Proceeds from 9/29/20 sale of property, \$472,139.56; interest earned, \$3.23
0538	6356 S. California	\$312,554.80	9/29/2020	Proceeds from 9/29/20 sale of property, \$312,552.66; interest earned, \$2.14
0553	7051 S. Bennett	\$482,823.50	9/23/2020	Proceeds from 9/23/20 sale of property, \$482,797.05; interest earned, \$26.45
0561	7201 S. Constance	\$951,418.24	9/30/2020	Proceeds from 9/30/20 sale of property, \$951,411.73; interest earned, \$6.51
0595	7957 S. Marquette	\$279,794.48	9/21/2020	Proceeds from 9/21/20 sale of property, \$279,775.32; interest earned, \$19.16
0603	4533 S. Calumet	\$450.84	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$450.83; interest earned, \$0.01

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#### SEC v. EquityBuild, Inc., et al. No. 18-cv-5587

Account Number	Account Name	Account Balance (as of September 30, 2020)	Date of Settlement	Reason for Change (if any) 7/1/20 - 9/30/20
0611	1017 W. 102nd	\$4,493.48	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$4,493.30; interest earned, \$0.18
0629	1516 E. 85th	\$2,901.92	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration,
0637	417 Oglesby	\$369.73	n/a	\$2,901.81; interest earned, \$0.11  Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$369.72; interest earned, \$0.01
0645	7922 S. Luella	\$200.54	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$200.54
0652	7925 S. Kingston	\$2,054.80	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$2,054.72; interest earned, \$0.08
0660	8030 S. Marquette	\$1,413.22	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$1,413.17; interest earned, \$0.05
0678	8104 S. Kingston	\$2,646.12	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$2,646.02; interest earned, \$0.10
0686	8403 S. Aberdeen	\$2,353.10	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$2,353.01; interest earned, \$0.09
0694	8405 S. Marquette	\$1,944.55	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$1,944.48; interest earned, \$0.07
0702	8529 S. Rhodes	\$935.10	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$935.07; interest earned, \$0.03
0710	9212 S. Parnell	\$2,460.21	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$2,460.11; interest earned, \$0.10
0728	10012 S. LaSalle	\$2,023.65	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$2,023.57; interest earned, \$0.08
0736	11318 S. Church	\$1,159.25	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$1,159.21; interest earned, \$0.04
0744	6554 S. Rhodes	\$1,086.05	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$1,086.01; interest earned, \$0.04
0751	6825 S. Indiana	\$1,053.45	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$1,053.41; interest earned, \$0.04
0769	7210 S. Vernon	\$224.08	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$224.08
0777	7712 S. Euclid	\$1,641.21	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$1,641.15; interest earned, \$0.06
0785	8107 S. Kingston	\$367.32	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$367.31; interest earned, \$0.01
0793	8346 S. Constance	\$1,470.92	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$1,470.86; interest earned, \$0.06

# Case: 1:18-cv-05587 Document #: 885-1 Filed: 11/30/20 Page 20 of 190 PageID #:19280

#### SEC v. EquityBuild, Inc., et al. No. 18-cv-5587

Account Number	Account Name	Account Balance (as of September 30, 2020)	Date of Settlement	Reason for Change (if any) 7/1/20 - 9/30/20
0801	8432 S. Essex	\$393.27		Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$393.26; interest earned, \$0.01
0819	8517 S. Vernon	\$1,173.74	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$1,173.70; interest earned, \$0.04
0827	2129 W. 71st	\$1,002.06	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$1,002.02; interest earned, \$0.04
0835	9610 S. Woodlawn	\$2,329.05	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$2,328.96; interest earned, \$0.09
0843	1401 W. 109th	\$2,367.25	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$2,367.16; interest earned, \$0.09
0850	1139 E. 79th	\$3,703.71	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$3,703.56; interest earned, \$0.15
0868	4611 S. Drexel	\$43,792.86	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$43,791.07; interest earned, \$1.79
0876	6217 S. Dorchester	\$12,818.57	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$12,818.05; interest earned, \$0.52
0884	7255 S. Euclid	\$26,409.06		Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$26,407.98; interest earned, \$1.08
0892	7024 S. Paxton	\$45,128.91	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$45,127.06; interest earned, \$1.85
0900	4317 S. Michigan	\$3,677.03	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$3,676.88; interest earned, \$0.15
0918	7701 S. Essex	\$4,768.36	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$4,768.17; interest earned, \$0.19
0926	816 E. Marquette	\$5,080.76	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$5,080.56; interest earned, \$0.20
0934	1422 E. 68th	\$1,822.07	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$1,822.00; interest earned, \$0.07
0942	2800 E. 81st	\$5,397.78	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$5,397.56; interest earned, \$0.22
0959	4750 S. Indiana	\$13,124.78	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$13,124.25; interest earned, \$0.53
0967	7840 S. Yates	\$8,758.56	n/a	Funds transfer pursuant to 9/21/05 Court order (Dkt 796) on second motion for restoration, \$8,758.21; interest earned, \$0.35
	TOTAL FUNDS HELD:	\$35,433,323.06		

# Exhibit F

# Case: 1:18-cv-05587 Document #: 885-1 Filed: 11/30/20 Page 22 of 190 PageID #:19282 Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

November 18, 2020

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen

No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No.6621124

Legal Fees for the period July 2020

\$33,852.00

**Expenses Disbursed** 

\$0.00

Due this Invoice

\$33,852.00

Date I	ndiv Ho	ours Description
Asset Analysis & Re	covery	
7/12/2020	KBD	2.10 Confer with counsel regarding potential claim (1.7); telephone conference with M. Rachlis regarding same (.4).
		Asset Analysis & Recovery
7/15/2020	KBD	0.30 Exchange correspondence with government representative.
		Asset Analysis & Recovery
7/16/2020	KBD	0.50 Telephone conference with and study correspondence from government representative.
		Asset Analysis & Recovery
7/20/2020	KBD	0.40 Confer with government representatives (.2); study correspondence from claimant counsel regarding investigation (.2).
		Asset Analysis & Recovery
7/23/2020	KBD	0.50 Exchange correspondence with claimants' counsel regarding request for documents and confer regarding same.
		Asset Analysis & Recovery
7/27/2020	KBD	0.50 Exchange correspondence with A. Porter and M. Rachlis regarding potential additional properties, potential affiliated entities, and background and analysis relating to same.
		Asset Analysis & Recovery
7/28/2020	KBD	1.00 Confer with counsel regarding potential claim.
		Asset Analysis & Recovery
SUBTOTAL:		[ 5.30 <u>2067.00]</u>
Asset Disposition		_
7/1/2020	KBD	0.30 Attention to sold properties, closing date confirmations, publication notice, and post-sale accounting reconciliation.

Asset Disposition

Date	Indiv	Hours Description
7/5/2020	KBD	0.50 Study and revise reply in support of eighth motion to approve sales.
		Asset Disposition
7/6/2020	KBD	0.20 Telephone conference and exchange correspondence with real estate broker regarding listing of sale of properties and notice to lenders.
		Asset Disposition
7/7/2020	KBD	1.00 Review correspondence from claimant's counsel regarding declination of credit bid and draft correspondence to A. Porter regarding same and execution of PSA (6250 Mozart) (.4); exchange correspondence with K. Pritchard regarding post-sale reconciliation funds (2909 E 78th) (.1); attention to escrow agreements (1131 E 79th Street, 3074 E Cheltenham) (.2); review notice to claimants of property sales and correspondence regarding same (.2); exchange correspondence with A. Porter regarding eighth motion to approve sales (.1).
		Asset Disposition
7/8/2020	KBD	3.00 Telephone conference with real estate broker regarding efforts to sell property and obtain survey (1102 Bingham) (.1); study and revise drafts of response to intervenor motion and study additional intervenor motions and memoranda relating to properties (7600 Kingston, 7656 Kingston, 6949 Merrill) (2.3); work on closing documents for sale of property (11117 Longwood) (.4); draft correspondence to J. Rak and K. Pritchard regarding sold properties (.2).
		Asset Disposition
7/14/2020	KBD	0.20 Exchange correspondence with A. Porter regarding planning for property closing (7051 Bennett) (.1); study correspondence regarding single family residence portfolio valuation work (.1).
		Asset Disposition
7/20/2020	KBD	0.50 Study draft ninth motion to approve sales (.4); exchange correspondence regarding planning for closing (7300 Lawrence) (.1).
		Asset Disposition
7/21/2020	KBD	1.10 Study and revise ninth motion to approve sales and draft correspondence to A. Porter regarding same (.8); study sale status of various properties (.1); confer with A. Porter and M. Rachlis regarding ninth motion to approve sales and single-family residence portfolio (.2).
		Asset Disposition
7/22/2020	KBD	0.40 Work on ninth motion for approval of sale of properties.
		Asset Disposition
7/23/2020	KBD	0.30 Attention to sale of property (1102 Bingham) and draft correspondence to real estate broker regarding same (.2); exchange correspondence regarding certificate of publication (.1).

Asset Disposition

	Date	Indiv	Hours D	Description
	7/24/2020	KBD	0.40	Work on consolidated motion to approve sale of properties.
				Asset Disposition
	7/26/2020	KBD	0.30	Exchange correspondence with A. Porter regarding planning for single family residence portfolio (.2); exchange correspondence with J. Rak regarding sold properties (.1).
				Asset Disposition
	7/31/2020	KBD	0.20	Exchange correspondence with real estate broker regarding potential purchaser interest (1102 Bingham).
				Asset Disposition
SUBTO	ΓΛΙ.			[ 8.40 3276.00]
		•		[ 0.40 3270.00]
Busines	s Operation			
	7/1/2020	KBD	1.80	Work on expenses and restoration issues with E. Duff, M. Rachlis, and K. Pritchard (1.3); exchange correspondence with J. Rak regarding real estate taxes (.2); study information regarding insurance and exchange correspondence with E. Duff regarding same (.1); review information and draft correspondence to insurance broker regarding sold properties (.2).
				Business Operations
	7/2/2020	KBD	0.60	Attention to payment of water bills (8000 Justine, 7237 Bennett, 7201 Constance) (.2); review analysis of property expenses (.2); exchange correspondence with insurance broker regarding certificate of insurance (1017 W 102nd) (.1); draft correspondence to lender's counsel regarding status of obtaining certificate of insurance (.1).
				Business Operations
	7/6/2020	KBD	0.20	Exchange correspondence with E. Duff regarding sold properties, segregated funds, and restoration motion.
				Business Operations
	7/7/2020	KBD	2.50	Work on second restoration motion and exchange correspondence regarding same (2.3); study correspondence from property manager and exchange correspondence with asset manager regarding repair work (7255 Euclid) (.2).
				Business Operations
	7/8/2020	KBD	0.40	Exchange correspondence with property manager and asset manager regarding tuckpointing repair for property (7255 Euclid) (.2); exchange correspondence regarding City property inspection and lack of notice (7237 Bennett) (.2).
				Business Operations

Date	Indiv	Hours Description
7/9/2020	KBD	0.50 Study revised second restoration motion (.4); attention to administrative judgment (7026-42 Cornell) (.1).
		Business Operations
7/10/2020	) KBD	0.90 Attention to payment of property expense (7237 Bennett) (.2); exchange correspondence with K. Pritchard regarding additional property expenses (.2); telephone conference with bank representative regarding wire transfers (.2); work on second restoration of funds motion (.3).
		Business Operations
7/12/2020	) KBD	3.10 Revise restoration motion and declaration (2.8); telephone conference with E. Duff regarding same (.2); draft correspondence to insurance adjuster regarding records for claim (638 Avers) (.1).
		Business Operations
7/13/2020	) KBD	0.60 Study revised restoration motion and declaration (.5); exchange correspondence with J. Wine regarding property inspections (7237 S Bennett) (.1).
		Business Operations
7/14/2020	) KBD	1.50 Revise restoration motion and declaration (.8); exchange correspondence with property manager regarding financial reporting and property expenses (8047 S Manistee, 7749 S Yates, 8201 S Kingston) (.2); exchange correspondence with A. Porter regarding property expenses and sales (7051 S Bennett, 7508 S Essex) (.1); exchange correspondence with counsel in third party action (8100 Essex) and study settlement agreement relating to same (.4).
		Business Operations
7/15/2020	KBD	0.40 Review property manager financial reporting.
		Business Operations
7/16/2020	) KBD	1.20 Revise restoration motion and declaration (.8); exchange correspondence with J. Rak regarding property sales and real estate taxes (.2); exchange correspondence with insurance adjuster regarding negotiation of claim (638 Avers) (.1); exchange correspondence with insurance broker regarding sale of property (11117 Longwood) (.1).
		Business Operations
7/17/2020	) KBD	2.60 Work on restoration motion and declaration (1.5); telephone conference and exchange correspondence with E. Duff regarding same (.6); attention to real estate taxes and exchange various correspondence with J. Rak regarding same (4611 S. Drexel, 6217 S. Dorchester, 7255 S. Euclid, 6250 S. Mozart, 7109 S. Calumet, 7110 S. Cornell, 1131 E. 79th Pl., 638 N Avers) (.3); work on property expenses (8201 S Kingston, 7749 S Yates, 7051 S Bennett, 8047

	Manistee) (.2).
	Business Operations
7/19/2020 KBD	2.00 Work on restoration motion, declaration, and exhibits.
	Business Operations
7/20/2020 KBD	3.10 Work on restoration motion, declaration, and exhibits (2.7); exchange correspondence with E. Duff regarding analysis of expenses for properties (8100 Essex, 8209 Ellis) (.4).
	Business Operations
7/21/2020 KBD	1.00 Study and revise draft second restoration motion and declaration and exchange correspondence with K. Pritchard and M. Rachlis regarding same (.7); study correspondence from property manager regarding property expenses (1401 W 109th, 6356 S California, 7201 S Constance, and 7237 S Bennett) and exchange correspondence with K. Pritchard relating to same (.2); draft correspondence to K. Pritchard regarding property expense review and analysis (.1).
	Business Operations
7/22/2020 KBD	1.20 Work on consolidated motion for property sales and funds restoration (.6); exchange correspondence with SEC (.1); exchange correspondence regarding real estate taxes (.1); exchange correspondence with J. Wine regarding various housing court matters (.2); exchange correspondence with E. Duff regarding property manager financial reporting (.2).
	Business Operations
7/24/2020 KBD	0.40 Draft proposed order for second restoration motion.
	Business Operations
7/27/2020 KBD	0.20 Study financial report relating to property (8100 Essex) (.1); exchange correspondence with J. Wine regarding property repair and expense (7508 Essex) (.1).
	Business Operations
7/28/2020 KBD	0.30 Exchange correspondence with insurance adjuster and K. Pritchard regarding claim and settlement proceeds (638 Avers) (.1); exchange correspondence with property manager, asset manager, and A. Porter regarding lease (4541 Calumet) (.1); attention to property maintenance invoice (1102 Bingham) (.1).
	Business Operations

## <u>Date</u> <u>Indiv Hours Description</u>

Claims	Administ	ration &	Objections	
Ciaiiis	Aummili	ialiona	ODJECTIONS	,

7/1/2020	KBD	v ( t N r r	Work on letter of credit terms (7109 Calumet) (3.0); telephone conference with lender counsel and M. Rachlis regarding potential resolution of claims (7110 Cornell, 6751 Merrill) (.5) and letter of credit (7109 Calumet) (.3); telephone conference with M. Rachlis regarding claims (7110 Cornell, 6751 Merrill) (.2); telephone conference with potential counsel for claimants regarding procedural status (.6); telephone conference with M. Rachlis regarding same (.2); work on claims review with J. Wine (.3); work on evidence of insurance for lender (.1).
7/2/2020	KBD	0.50 V	Work on response to claimants (.3); review claimants' objections to eighth sales motion (.2).
		(	Claims Administration & Objections
7/6/2020	KBD	0.30 V	Work on response to claimants.
		(	Claims Administration & Objections
7/7/2020	KBD	0.20 V	Work on communication with claimant.
		(	Claims Administration & Objections
7/8/2020	KBD		Work on responses to claimant inquiries (.4); exchange communications relating to notice to institutional lenders of sale of properties (.1).
		(	Claims Administration & Objections
7/9/2020	KBD		Study and work on response to claimant inquiry regarding motion to sell property (7600 Kingston).
		(	Claims Administration & Objections
7/10/2020	KBD	0.50 V	Work on response to claimants.
		(	Claims Administration & Objections
7/13/2020	KBD	le	Telephone conference with SEC (.8); telephone conference with counsel for lender regarding claims and properties (7110 Cornell, 6751 Merrill) (.4); telephone conferences with M. Rachlis regarding same (.5).
		(	Claims Administration & Objections
7/14/2020	KBD	6	Prepare for hearing before Judge Lee regarding claims process (1.5): review alternate proposal for claims process from lender's counsel (.5); work on claims process with M. Rachlis and J. Wine (1.6); attention to correspondence with claimant regarding insurance issue (.2).

Claims Administration & Objections

Date Indiv H	ours Description
7/15/2020 KBD	4.40 Prepare for hearing before Judge Lee regarding claims process (2.0); participate in hearing before Judge Lee (1.3); work on claims process issues relating to hearing with M. Rachlis and J. Wine and exchange correspondence with M. Rachlis relating to same (.8); review correspondence from claimants and work on responses to same (.3).
	Claims Administration & Objections
7/16/2020 KBD	0.40 Attention to claimant communications (.2); exchange correspondence with claimant's counsel regarding insurance claim (.1); attention to documents inventory for communications with institutional lenders (.1).
	Claims Administration & Objections
7/17/2020 KBD	2.70 Work on internal EB document collection and production issues (1.0); confer with M. Rachlis and J. Wine regarding same (.8); telephone conference with claimant's counsel regarding same (.2); draft correspondence to J. Wine regarding same (.4); telephone conference with M. Rachlis regarding document issues (.3).
	Claims Administration & Objections
7/20/2020 KBD	0.70 Work on responses to claimant communications (.3); exchange correspondence with claimants' counsel regarding tax payment planning (.1); study correspondence from J. Wine regarding claims and tax returns (.3).
	Claims Administration & Objections
7/21/2020 KBD	0.50 Exchange correspondence with claimant's representative regarding real estate taxes (7024 Paxton) (.2); prepare for call with claimants' counsel regarding claims against properties (7749 S. Yates & 5450 S. Indiana) and draft correspondence to J. Wine relating to same (.3).
	Claims Administration & Objections
7/22/2020 KBD	3.70 Prepare for call with claimants' counsel relating to document repository and exchange correspondence with M. Rachlis and J. Wine relating to same (.6); telephone conference with claimants' counsel regarding document repository, EB documents, custodians, various logistics, and costs (.9); telephone conference with M. Rachlis and J. Wine regarding same (.4); prepare for call with claimant's counsel relating to properties (5450 Indiana, 7749 Vates) (.5); telephone conference with claimant's counsel and M.

Claims Administration & Objections

7749 Yates) (.5); telephone conference with claimant's counsel and M. Rachlis regarding claims (5450 Indiana, 7749 Yates) (.8); study claimant list of requested documents (.1); work on responses to claimant inquiries (.4).

Date I	ndiv Ho	ours D	escription
7/23/2020	KBD	,	Prepare for call with lender's counsel regarding insurance claim (638 N. Avers) (.3); work on employee list for production of documents and study related information (.3); study claim and exchange correspondence with J. Wine relating to same (.2); telephone conference with property regarding communications with claimant and draft correspondence to claimant relating to same (.3); attention to standard interrogatories and requests for production (.2); exchange correspondence with claimant regarding hearings and counsel (.2).
			Claims Administration & Objections
7/24/2020	KBD	;	Telephone conference with lender and counsel regarding insurance claim and potential credit bid (.3); exchange correspondence with J. Wine regarding claimants' proof of claim forms (.2); exchange correspondence with A. Porter regarding updated estimated closing costs (638 Avers) (.1).
			Claims Administration & Objections
7/25/2020	KBD	0.30	Review records relating to claims (7749 Yates, 5450 Indiana).
			Claims Administration & Objections
7/26/2020	KBD	0.30	Work on response to claimant inquiry (.1); study motion to intervene (.2).
			Claims Administration & Objections
7/27/2020	KBD	:	Exchange correspondence regarding potential claimant (.1); work on responses to various claimant communications (1.2); review inquiry from lender relating to property (7024 Paxton) and gather information relating to same (.2); study institutional lenders' motion to intervene and draft correspondence to M. Rachlis and J. Wine relating to same (.3); work on claimants' counsel's request for clients' claims form submissions (.6).
			Claims Administration & Objections
7/28/2020	KBD		Work on responses to various claimant communications (.5); exchange correspondence with lender and property manager relating to property (7024 Paxton) (.3); work on standard discovery requests (.3).
			Claims Administration & Objections
7/29/2020	KBD	,	Telephone conferences and exchange correspondence with M. Rachlis and J. Wine regarding collection and production of internal EquityBuild documents (.8); telephone conference with SEC (.2); telephone conference with claimants' counsel, M. Rachlis, and J. Wine regarding plan for production of internal EquityBuild documents (.7); work on response to claimant (.1); exchange correspondence with J. Wine and M. Rachlis regarding collecting records requested by claimants and repository vendors (.4).
			Claims Administration & Objections

Date Indiv I	Hours Description
7/30/2020 KBD	0.20 Attention to response to claimant inquiry.
	Claims Administration & Objections
7/31/2020 KBD	0.60 Attention response to claimant communications.
	Claims Administration & Objections
SUBTOTAL:	[34.80 13572.00]
Status Reports	
7/1/2020 KBD	0.30 Work on status report.
	Status Reports
7/22/2020 KBD	0.20 Exchange correspondence with J. Wine regarding content for status report.
	Status Reports
7/24/2020 KBD	0.50 Study draft status report (.3); draft correspondence to J. Rak regarding information relating to sold properties (.2).
	Status Reports
7/26/2020 KBD	2.50 Study and revise draft status report and draft correspondence to J. Wine regarding same.
	Status Reports
7/27/2020 KBD	2.30 Work on and revise draft status report (2.1); exchange correspondence with J. Rak and K. Pritchard regarding sold properties (.2).
	Status Reports
7/28/2020 KBD	2.50 Work on and revise draft status report and exchange various correspondence with J. Wine regarding same.
	Status Reports
7/29/2020 KBD	0.40 Work on status report.
	Status Reports
7/30/2020 KBD	0.40 Review status report and exchange various correspondence regarding same.
	Status Reports
SUBTOTAL:	<u> </u>

	Date	Indiv	Hours D	Description
Tax Issu	es			
	7/1/2020	KBD	0.80	Study draft tax returns and confer with K. Pritchard regarding same (.7); exchange correspondence with J. Rak regarding tax ID for entity (.1).
				Tax Issues
	7/5/2020	KBD	0.20	Draft correspondence to J. Rak regarding investigation and communications regarding income and expense records (4755 S St Lawrence).
				Tax Issues
	7/9/2020	KBD	0.20	Exchange correspondence with J. Rak and A. Watychowicz regarding tax documentation.
				Tax Issues
	7/10/2020	KBD	0.40	Draft correspondence to accounting firm representative regarding financials (4755 South St) and tax filings (.2); draft correspondence to accounting firm representative regarding various tax issues (.2).
				Tax Issues
	7/17/2020	KBD	2.00	Discuss various tax issues with accounting firm representative (1.8); attention to tax notices (7922 S. Luella, 2136 W 83rd) (.1); exchange correspondence with A. Watychowicz regarding communication with investors and tax forms (.1).
				Tax Issues
	7/21/2020	KBD	0.40	Draft power of attorney regarding state franchise tax and exchange correspondence relating to same (.3); study correspondence from K. Pritchard regarding draft tax returns (.1).
				Tax Issues
	7/29/2020	KBD	0.30	Exchange correspondence with accounting firm representative regarding form 1099 issue (.1); exchange correspondence with accounting firm representative regarding tax return (6759 S Indiana, 4750 Indiana) (.2).
				Tax Issues
	7/31/2020	KBD	0.40	Study draft tax returns.
				Tax Issues
SUBTOT	ĀL:			[ 4.70 1833.00]

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	Summary of Activity			
	•	Hours	Rate	
Kevin B. Duff		86.80	390.00	\$33.852.00

# **SUMMARY**

Legal Services	\$33,852.00
Other Charges	\$0.00
TOTAL DUE	\$33,852.00

# Case: 1:18-cv-05587 Document #: 885-1 Filed: 11/30/20 Page 35 of 190 PageID #:19295 $\bf Rachlis\ Duff\ \&\ Peel,\ LLC$

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

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November 23, 2020

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No.6621125

Legal Fees for the period August 2020 \$23,127.00

Expenses Disbursed \$0.00

Due this Invoice \$23,127.00

	Date I	ndiv H	lours D	escription
Asset Ar	nalysis & Re	covery		
	8/7/2020	KBD	0.50	Exchange correspondence with M. Rachlis regarding bank records issues.
				Asset Analysis & Recovery
	8/8/2020	KBD	0.70	Study records regarding potential claim and draft correspondence to potential counsel regarding same.
				Asset Analysis & Recovery
	8/14/2020	KBD	0.20	Draft correspondence to A. Watychowicz regarding investigation of potential claims.
				Asset Analysis & Recovery
	8/24/2020	KBD	0.40	Exchange correspondence with J. Wine regarding maintenance of records platform (.1); exchange correspondence with J. Rak regarding analysis of property valuation information (.2); review correspondence from A. Porter regarding asset confirmation (.1).
				Asset Analysis & Recovery
	8/27/2020	KBD	0.20	Exchange correspondence with A. Porter regarding reviewed documents (.1); draft correspondence to government representatives (.1).
				Asset Analysis & Recovery
SUBTOT				[ 2.00 780.00]
Asset Di	sposition		<del></del>	
	8/5/2020	KBD	0.20	Telephone conference with real estate broker regarding bids on listed properties and exchange correspondence with real estate broker regarding planning for bid review.
				Asset Disposition
	8/6/2020	KBD	1.70	Study analysis of offers on properties and confer with real estate broker, A. Porter, and M. Rachlis regarding same.
				Asset Disposition
	8/7/2020	KBD	1.20	Study offers to purchase properties and confer with real estate broker, M. Rachlis, and A. Porter regarding same (.7); telephone conference with real estate broker and K. Pritchard regarding property financial reports (.1); exchange correspondence with real estate broker regarding work to list single family residence portfolio (.2); draft correspondence regarding post-sale reconciliation of accounts following sales (8201 S Kingston and 7749 S Yates) (.2).
				Asset Disposition

Date Indiv H	lours Description
8/10/2020 KBD	1.50 Study summary of offers on properties and confer with real estate broker, M. Rachlis, and A. Porter regarding same (1.1); telephone conference and exchange correspondence with real estate broker regarding offers to purchase properties (.4).
	Asset Disposition
8/11/2020 KBD	0.90 Telephone conferences and exchange correspondence with real estate broker and M. Rachlis regarding offers on properties.
	Asset Disposition
8/12/2020 KBD	0.50 Telephone conference with real estate broker and counsel regarding marketing and sale of single family residence portfolio.
	Asset Disposition
8/13/2020 KBD	0.90 Work on closing documents (7110 S Cornell) (.5); study correspondence from real estate broker regarding sales efforts and market update (1102 Bingham) (.2); exchange correspondence regarding estimated closing costs (.2).
	Asset Disposition
8/14/2020 KBD	0.50 Telephone conference with real estate broker regarding communication with lender's counsel relating to potential credit bid (.1); exchange correspondence with A. Porter regarding contract for property sale (4533-37 Calumet) (.2); study intervenor's reply brief and exchange correspondence with A. Porter regarding same (6949-59 Merrill, 7600-10 Kingston, 7656-58 Kingston) (.2).
	Asset Disposition
8/18/2020 KBD	0.90 Work on purchase and sale agreements and exchange correspondence with A. Porter regarding same (7442 Calumet, 7701 Essex, 7024 Paxton, 816 Marquette, 431 E 42nd, 4317 Michigan) (.6); exchange correspondence with real estate broker regarding sale of properties (1422 E 68th, 2800 E 81st, 4750 S Indiana and 7840 S Yates) (.3).
	Asset Disposition
8/20/2020 KBD	0.80 Telephone conference with real estate broker regarding communications with lender's counsel regarding sales prices (.2); exchange correspondence with A. Porter regarding sale agreements (2800 E. 81st, 7840 Yates) (.3); draft correspondence to A. Porter regarding lenders' declination of credit bid (7255 Euclid, 6217 Dorchester, 4611 Drexel) (.1); exchange correspondence with J. Wine and A. Porter regarding efforts to resolve disputed City actions (4520 Drexel) (.2).
	Asset Disposition

Date	Indiv	Hours Desc	ription
8/21/2020	KBD		hange correspondence with A. Porter regarding sales agreement (4611 xel).
		Ass	et Disposition
8/24/2020	KBD		dy correspondence from A. Porter regarding ninth motion to confirm sale roperties and objections to same.
		Ass	et Disposition
8/25/2020	KBD	corr corr resi real of p and stud Por	dy draft order granting motion to sell properties and exchange respondence with A. Porter regarding same (.4); exchange respondence with A. Porter regarding preparation of single family dence portfolio for sale (.1); exchange correspondence with A. Porter and estate broker regarding communications with purchaser regarding sale roperty (2800-06 E. 81st) (.3); exchange correspondence with A. Porter M. Rachlis regarding purchaser request for extension (7840 Yates) (.2); dy intervenor motion to strike (.2); exchange correspondence with A. ter regarding hold harmless requests to title insurance companies (7953-Marquette, 7508 Essex, 6356 California) (.3).
		Ass	et Disposition
8/26/2020	KBD		hange correspondence with real estate broker and A. Porter regarding chaser default and follow up bidding.
		Ass	et Disposition
8/27/2020	KBD	defa (.5); 81s com (795	hange correspondence with real estate broker and A. Porter regarding aulted purchaser, potential bidders, and notice to lenders (2800-06 E 81st); telephone conference with real estate broker regarding same (2800-06 E t) (.1); exchange correspondence with A. Porter regarding nmunications with title insurance company representative regarding policy 57-59 Marquette) (.2); study correspondence from A. Porter regarding sale roperty (7201 Dorchester) (.2).
		Ass	et Disposition
8/28/2020	KBD	com unit	hange correspondence with real estate broker and A. Porter regarding number in the following property manager regarding property s (7201 Dorchester) (.2); exchange correspondence with claimant's nsel regarding property expenses (.1).
		Ass	et Disposition
8/31/2020	KBD		ephone conference with A. Porter regarding sale of single family residence folio and additional property.
		Ass	et Disposition
AL:			[12.70 4953.00]
<b>△∟.</b>			[12.70 4903.00]

	<u>Date</u>	Indiv	Hours D	Description
Busines	s Operations	3		
	8/3/2020	KBD	0.20	Exchange correspondence with K. Pritchard regarding payment of real estate taxes and property expenses.
				Business Operations
	8/6/2020	KBD	0.20	Review property expenses from property manager.
				Business Operations
	8/7/2020	KBD	0.30	Review information relating to property manager expenses (8201 S Kingston, 7749 S Yates, 7051 S Bennett, 8047 S Manistee) (.2); review correspondence relating to real estate taxes for property (1102 Bingham) (.1).
				Business Operations
	8/10/2020	KBD	0.20	Exchange correspondence with J. Rak and asset manager regarding real estate taxes, subsidized housing application, and communications with property manager (4750 Indiana).
				Business Operations
	8/11/2020	KBD	0.20	Exchange correspondence with J. Wine and J. Rak regarding property repairs (7508 Essex).
				Business Operations
	8/12/2020	KBD	0.40	Study property manager financial reporting (.3); exchange correspondence with J. Wine and A. Porter regarding property repairs (7508 Essex) (.1).
				Business Operations
	8/14/2020	KBD	0.40	Exchange correspondence with property manager regarding property expenses (7749 Yates, 8201 Kingston) (.2); exchange correspondence with J. Wine regarding same (.2).
				Business Operations
	8/17/2020	KBD	0.20	Review correspondence from insurance adjuster regarding settlement negotiations (638 Avers) (.1); exchange correspondence with property manager regarding property reports (7749 Yates, 8201 Kingston, 8047 Manistee) (.1).
				Business Operations
	8/19/2020	KBD	0.20	Exchange correspondence with J. Wine regarding written discovery in state court action (.1) and settlement of another action (.1).
				Business Operations
	8/20/2020	KBD	0.20	Exchange correspondence regarding real estate tax issue and potential move-in (4533 Calumet).
				Business Operations

<u>D</u>	Date I	ndiv	Hours D	Description
8	/21/2020	KBD	0.40	Telephone conference with A. Porter and J. Wine regarding municipal claims and property sales.
				Business Operations
		KBD	0.20	Exchange correspondence with J. Wine regarding settlement of state court action.
				Business Operations
8	/24/2020	KBD	0.20	Exchange correspondence with J. Wine regarding administrative court hearing (4520 Drexel) (.1); study spreadsheet relating to funds requested from property manager (.1).
				Business Operations
8	/25/2020	KBD	0.30	Exchange correspondence with K. Pritchard, E. Duff, and property manager regarding requested expense records (.2); exchange correspondence with J. Rak regarding evaluation of property taxes (.1).
				Business Operations
8	/27/2020	KBD	0.40	Exchange correspondence with K. Pritchard regarding property expenses (.2); review information and exchange correspondence regarding tax payments for properties (4611 S. Drexel, 6217 S. Dorchester, 7255 S. Euclid, 6250 S. Mozart, 7109 S. Calumet, 7110 S. Cornell, 1131 E. 79th Pl., 638 N Avers) (.2).
				Business Operations
8	/28/2020	KBD	0.20	Exchange correspondence with property manager and K. Pritchard regarding property expenses (7760 S. Coles, 8000-8002 S. Justine, 8107 S. Ellis, 8209-8213 S. Ellis, 8214-8216 S. Ingleside).
				Business Operations
SUBTOTAL	L:			[ 4.20 1638.00]
Claims Adı	ministratio	n & O	bjections	<u>S</u>
8	/1/2020	KBD	0.20	Study correspondence from claimant and exchange correspondence regarding communication with claimant regarding claim and former properties.
				Claims Administration & Objections
8	/3/2020	KBD	2.50	Work on protective order and legal research regarding same (.5); attention to communications with claimants regarding claims, claims process, and timing (.9); exchange correspondence with and attention to claimant's counsel regarding claims against property (1131-41 E 79th) (.2); analysis of claimant intervention motion and exchange correspondence with J. Wine regarding same (.3); study correspondence from M. Rachlis regarding claimants'

Date	Indiv	Hours	Description

counsel's request for claim forms (.2); exchange correspondence with claimant regarding request for closing costs (638 Avers) (.1); draft correspondence to A. Porter regarding efforts to address lien dispute over property (7237 Bennett) (.3).

Claims Administration & Objections

8/4/2020 KBD

1.40 Exchange correspondence with J. Wine and M. Rachlis regarding document discovery issues and communications with claimants' counsel (.3); work on protective order and standard written discovery requests for all claimants and exchange correspondence with J. Wine and M. Rachlis regarding same (.3); work on request of claimant's counsel for property expense documentation and prepare response to same (.4); draft correspondence to other claimant's counsel regarding requests for records (.3); study correspondence from and draft correspondence to claimant regarding claims submission and reporting of same (.1).

Claims Administration & Objections

8/5/2020 KBD

2.10 Exchange correspondence with M. Rachlis regarding correspondence with claimant's counsel regarding requests for (.4); exchange correspondence with claimant's counsel regarding property expense documentation and work on gathering information relating to same (.2); study further correspondence from claimant regarding claims submission and reporting of same and work on response (.2); study correspondence from claimant's counsel regarding intervention motion (.1); review correspondence from claimant's counsel regarding corporate statuses and exchange correspondence with E. Duff regarding same (.2); work on response to claimants' inquiries regarding claims process and timing (1.0).

Claims Administration & Objections

8/6/2020 KBD

1.00 Work on responses to claimants (.6); attention to role of receiver issue (.4).

Claims Administration & Objections

8/7/2020 KBD

1.20 Confer with M. Rachlis and J. Wine regarding EB documents, potential resolution of claims relating to properties (4520 Drexel and 5001 Drexel), and various other claims related issues (.9); attention to response to claimant communications relating to claims (.3).

Claims Administration & Objections

8/8/2020 KBD

1.30 Legal research regarding intervention motion and claims process and draft correspondence to J. Wine regarding same.

Claims Administration & Objections

Date	Indiv	Hours Description
8/9/2020	KBD	0.20 Attention to claim and supporting documents and exchange correspondence with A. Watychowicz regarding same.
		Claims Administration & Objections
8/10/2020	KBD	0.70 Study standard written discovery requests and exchange correspondence regarding same.
		Claims Administration & Objections
8/11/2020	KBD	2.50 Prepare for hearing before Judge Lee (2.0); review correspondence from M. Rachlis regarding preparation for hearing (.1); legal research regarding claims (.4).
		Claims Administration & Objections
8/12/2020	KBD	1.30 Confer with M. Rachlis and J. Wine regarding standard discovery, claimants' intervention motion, corporation status issues, and preparation for hearing before Judge Lee (1.1); review correspondence from counsel for claimant regarding status of claims (.1); exchange correspondence with counsel for claimant regarding bid information in connection with property sale (.1).
		Claims Administration & Objections
8/13/2020	KBD	4.40 Prepare for hearing before Judge Lee on claims process (1.5); telephone conference with J. Wine and M. Rachlis regarding standard discovery requests, draft protective order, and intervention motion (.3); appear for hearing before Judge Lee (1.2); confer with M. Rachlis and J. Wine regarding various issues raised during hearing (1.2); exchange correspondence relating to communication with claimant's counsel regarding claims process (.1); exchange correspondence with claimant's counsel regarding insurance claim (638 Avers) (.1).
		Claims Administration & Objections
8/14/2020	KBD	0.20 Attention to correspondence from lender's counsel regarding request for extension of time to credit bid and exchange correspondence with real estate broker regarding same (4611 Drexel).
		Claims Administration & Objections
8/16/2020	KBD	0.30 Review draft standard discovery requests.
		Claims Administration & Objections
8/17/2020	KBD	0.20 Exchange correspondence with J. Wine regarding communication with investor (.1); exchange correspondence with real estate broker regarding communication with claimant's counsel relating to credit bid declination (4317 S Michigan, 7442-48 S Calumet, 816-20 E Marquette, 7701 S Essex) (.1).
		Claims Administration & Objections

#### Date Indiv Hours Description

8/18/2020 KBD

1.90 Telephone conference with and study correspondence from M. Rachlis and J. Wine regarding claims documentation and claimants' request for records (.4); telephone conference with claimants' counsel regarding requests for various EquityBuild records (1.0); attention to communication from City attorney and exchange correspondence with J. Wine regarding same (.2); review correspondence from claimant regarding former EB properties (.1); work on responses to various claimant communications (.2).

Claims Administration & Objections

8/20/2020 KBD

0.30 Work on response to claimant communication and exchange correspondence with A. Watychowicz regarding same (.2); exchange correspondence regarding communications with debt collector (7026 Cornell) (.1).

Claims Administration & Objections

8/24/2020 KBD

0.90 Study claimants' responses to property sales and restoration motion (5450 Indiana, 7749 Yates, 7760 Coles, 8107 Ellis, 8214 Ingleside, 8000 Justine) (.5); study correspondence from A. Porter regarding same and properties ready to close (.2); exchange correspondence with J. Wine regarding information provided to claimant's counsel (.1); review correspondence from claimant's counsel and real estate broker regarding request for settlement statement (7110 Cornell) and draft correspondence to real estate broker regarding same (.1).

Claims Administration & Objections

8/25/2020 KBD

2.30 Study claimants' objections to sale motion and restoration motion (5450 Indiana, 7749 Yates, 7760 Coles, 8107 Ellis, 8214 Ingleside, 8000 Justine) (.8); outline responses to same (.5); exchange correspondence with J. Wine regarding same (.2); telephone conference with SEC (.1); study claims by property information and correspondence from J. Wine relating to same (.2); work on inquiries from and responses to claimants (.5).

Claims Administration & Objections

8/26/2020 KBD

0.80 Exchange correspondence with J. Wine regarding information relating to properties (1131-41 E 79th, 6250 S Mozart) subject to claimants' objections to sales motion (.2); exchange correspondence with claimant's counsel regarding real estate taxes for various properties and exchange correspondence with J. Rak regarding same (.2); study correspondence from claimant's counsel regarding property manager expense records and exchange correspondence with property manager, E. Duff, and M. Rachlis regarding same (.4).

Claims Administration & Objections

8/27/2020 KBD

3.20 Study objections to ninth sales motion (1131-41 E. 79th Pl and 6250 S. Mozart) (1.5); work on response (1131-41 E. 79th Pl and 6250 S. Mozart) (1.0); attention to responses to claimants (.1); exchange correspondence regarding claimant's request for records (8107 Ellis) (.2); draft correspondence to claimant's counsel regarding payment of real estate

Date	Indiv	Hours D	Description
			taxes (4611 S. Drexel, 6217 S. Dorchester, 7255 S. Euclid, 6250 S. Mozart, 7109 S. Calumet, 7110 S. Cornell, 1131 E. 79th Pl., 638 N. Avers) (.1); exchange correspondence with A. Porter and J. Wine regarding claims against properties (1131-41 E. 79th Pl and 6250 S. Mozart) (.3).
			Claims Administration & Objections
8/28/2020	KBD	0.30	Review information relating to claims against properties (1131-41 E 79th and 6250 S Mozart) (.2); attention to communication with claimant's counsel regarding potential credit bid (2800 E 81st) (.1).
			Claims Administration & Objections
8/29/2020	KBD	0.50	Exchange correspondence with J. Wine and A. Watychowicz regarding counting claims (.2); draft correspondence to J. Wine and A. Porter regarding communication with claimant regarding investment custodian (.2); exchange correspondence with J. Wine regarding response to claimant (.1).
			Claims Administration & Objections
8/30/2020	KBD	0.40	Study pleadings regarding objections to property sales and draft correspondence to A. Watychowicz and K. Pritchard.
			Claims Administration & Objections
8/31/2020	KBD	5.00	Telephone conferences with J. Wine regarding claims on properties (1131 E 79th and 6250 Mozart) (.5); telephone conference with A. Porter regarding mortgage documents and histories (1131 E79th and 6250 Mozart) (.3); work on reply to objections to ninth sales motion (1131 E 79th and 6250 Mozart) and draft correspondence to J. Wine and M. Rachlis relating to same (3.7); exchange correspondence regarding claimant request for extension of time to credit bid (2800 E 81st) (.3); work on response to claimant's counsel (.2).
			Claims Administration & Objections
TAL:			[35.10 13689.00]
Reports			
8/9/2020	KBD	0.20	Work on information relating to claims.
			Status Reports
8/18/2020	KBD	0.20	Telephone conference with SEC.

Status Reports

<u>Date</u>	e	Indiv	Hours [	Description
SUBTOTAL:				[ 0.40 156.00]
Tax Issues				
8/3/2	2020	KBD	0.50	Study draft tax returns.
				Tax Issues
8/10	0/2020	KBD	1.60	Telephone conference with accounting firm representative regarding tax return issues.
				Tax Issues
8/11	1/2020	KBD	0.30	Exchange correspondence with accounting firm representatives regarding tax returns.
				Tax Issues
8/12	2/2020	KBD	1.80	Telephone conferences with accounting firm representative regarding tax returns (1.2); confer with M. Rachlis and J. Wine regarding same (.2); exchange correspondence with accounting firm representative regarding tax returns (.4).
				Tax Issues
8/13	3/2020	KBD	0.20	Exchange correspondence with accounting firm representative regarding tax return filings.
				Tax Issues
8/14	4/2020	KBD	0.20	Exchange correspondence with accounting firm representatives regarding tax return filings.
				Tax Issues
8/17	7/2020	KBD	0.10	Review correspondence and draft correspondence to A. Porter regarding tax form relating to sale of property (8107 Ellis).
				Tax Issues
8/19	9/2020	KBD	0.20	Attention to correspondence regarding tax forms and real estate sales (11117 Longwood, 7749 Yates, 6749 Merrill).
				Tax Issues
SUBTOTAL:				[ 4.90 1911.00]

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	Summary of Activity			
		Hours	Rate	
Kevin B. Duff		59.30	390.00	\$23 127 00

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# **SUMMARY**

Legal Services	\$23,127.00
Other Charges	\$0.00
TOTAL DUE	\$23,127.00

# Case: 1:18-cv-05587 Document #: 885-1 Filed: 11/30/20 Page 48 of 190 PageID #:19308 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

November 20, 2020

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No.6621126

Legal Fees for the period September 2020 \$36,699.00

Expenses Disbursed \$0.00

Due this Invoice \$36,699.00

<u>Date</u>	Indiv H	ours D	escription		
Asset Analysis & Recovery					
9/1/2020	KBD	0.20	Exchange correspondence regarding bank records.		
			Asset Analysis & Recovery		
9/2/2020	KBD	0.20	Exchange correspondence with K. Pritchard regarding bank records.		
			Asset Analysis & Recovery		
9/3/2020	KBD	1.50	Review correspondence from records vendor (.1); confer with government representatives, M. Rachlis, and A. Porter (1.4).		
			Asset Analysis & Recovery		
9/9/2020	KBD	0.30	Telephone conference with government representative.		
			Asset Analysis & Recovery		
9/24/2020	KBD	0.20	Exchange correspondence with A. Watychowicz regarding communication with vendor regarding preservation of records.		
			Asset Analysis & Recovery		
SUBTOTAL: [ 2.40 936.00]					
Asset Disposition			( =		
9/1/2020	KBD	0.70	Draft correspondence to J. Wine regarding draft order approving sale of properties (.1); exchange correspondence with A. Porter regarding lack of credit bid and execution of purchase and sale agreement (2800 E 81st) (.3); execute additional purchase and sale agreements (7255 Euclid, 6217 Dorchester) (.3).		
			Asset Disposition		
9/3/2020	KBD	0.40	Exchange correspondence with J. Rak and A. Watychowicz regarding communications with and documents from title insurance company regarding properties (7508 S Essex, 6356 S. California) (.2); study correspondence from title insurance representative regarding title exceptions (7508 S Essex, 6356 S. California) (.2).		
			Asset Disposition		
9/9/2020	KBD	0.40	Exchange correspondence regarding proposed order on ninth sales motion (.2); telephone conference with A. Porter regarding same (.2).		
			Asset Disposition		
9/10/2020	KBD	1.00	Confer with M. Rachlis, A. Porter, and J. Wine regarding order on ninth sales motion (.6); telephone conferences with real estate broker regarding ninth sales motion and additional properties (7109 Calumet, 1102 Bingham, 7237		

Date	Indiv F	lours Description
		Bennett) (.3); exchange correspondence with lender counsel and A. Porter regarding resolution of title exception (6356 California) (.1).
		Asset Disposition
9/11/2020	KBD	0.20 Exchange correspondence with real estate broker regarding efforts to sell property (1102 Bingham).
		Asset Disposition
9/14/2020	KBD	0.30 Telephone conference with real estate broker regarding potential offer on property (1102 Bingham) and contract language.
		Asset Disposition
9/15/2020	KBD	0.60 Exchange correspondence with A. Porter regarding sale of properties (1131-41 E. 79th, 6250 S Mozart, and 3074 E. Cheltenham) (.2); exchange correspondence with J. Wine regarding orders approving sale of properties (.3); exchange correspondence with A. Porter and J. Wine regarding order and title commitment issue (7508 Essex) (.1).
		Asset Disposition
9/17/2020	KBD	0.30 Attention to communication from buyer's lender (4611 Drexel) (.1); exchange correspondence with J. Rak regarding property sales data (.2).
		Asset Disposition
9/18/2020	KBD	1.10 Work on closing documents with A. Porter and J. Rak (7957 Marquette, 3074 Cheltenham, 7051 Bennett) (.6); draft correspondence to and telephone conference with real estate broker regarding property (1102 Bingham) (.2); study purchase offer (1102 Bingham) (.2); exchange correspondence with J. Wine regarding draft proposed order (.1).
		Asset Disposition
9/23/2020	KBD	0.70 Exchange correspondence and telephone conference with real estate broker regarding offer on property (1102 Bingham) (.5); exchange correspondence with A. Porter regarding issues relating to sale of properties (6558 Vernon, 7237 Bennett) (.2).
		Asset Disposition
9/24/2020	KBD	0.70 Telephone conference and exchange correspondence with real estate broker regarding negotiations over property (1102 Bingham) (.4); exchange correspondence with A. Porter regarding issue relating to sale and closing of property (7508 Essex) (.2); study correspondence from A. Porter regarding sale of property and related issues (7201 Dorchester) (.1).
		Asset Disposition
9/26/2020	KBD	0.60 Study tenth motion to approve sales and exchange correspondence with real estate broker and A. Porter regarding same (.5); exchange correspondence with A. Porter regarding issue relating to sale of property (7201 Dorchester (.1).

**Asset Disposition** 

	Date I	ndiv Ho	ours D	Description
	9/28/2020	KBD	2.40	Telephone conference with real estate agent regarding negotiation and communication with potential purchasers (.1); work on closing documents (6356 California, 2736 W 64th, 5618 S King, 7201 Constance, 6355 Talman) (2.0); study tenth motion to approve sales (.3).  Asset Disposition
	9/30/2020	KBD	1.80	Exchange correspondence with J. Rak regarding property appraisals and communication with real estate broker regarding same and property listed for sale (1102 Bigham) (.2); exchange correspondence with J. Rak regarding post-sale reconciliation of account (7110 Cornell) (.2); study information from J. Rak regarding property sales (.2); study revisions to and revise tenth motion to approve sales (1.2).
				Asset Disposition
SUBTOT	AL:			[11.20 4368.00]
Business	S Operations	<b>;</b>	_	
	9/1/2020	KBD	0.30	Review and revise responses to written discovery responses in state court action (2478 78th Street).
				Business Operations
	9/2/2020	KBD	0.40	Attention to water payment planning (7109 Calumet, 7656 Kingston, 7237 Bennett, 7201 Constance) (.2); exchange correspondence regarding insurance settlement of personal injury claim against property manager (4520 Drexel) (.2).
				Business Operations
	9/4/2020	KBD	0.20	Exchange correspondence with J. Rak regarding real estate taxes (7656 Kingston, 7237 Bennett, 7109 Calumet).
				Business Operations
	9/8/2020	KBD	0.40	Exchange correspondence with A. Porter and J. Wine regarding notice of violation (7024 Paxton) (.1); exchange correspondence with property manager regarding property expenses (7760 Coles, 8107 Ellis, 8209 Ellis, 8214 Ingleside, 8000 Justine) (.3).
				Business Operations
	9/10/2020	KBD	0.50	Exchange correspondence with J. Rak regarding planning for payment of real estate taxes (4611 S. Drexel, 6217 S. Dorchester, 7255 S. Euclid, 6250 S. Mozart, 7109 S. Calumet, 7110 S. Cornell, 1131 E. 79th Pl., 638 N Avers) (.2); attention to correspondence regarding payment of real estate taxes (2736 W 64th) (.3).
				Business Operations

Date	Indiv Ho	ours Description
9/15/2020	KBD	0.90 Review draft release in state court action and exchange correspondence with J. Wine regarding same (.2); work on real estate taxes analysis and draft correspondence to K. Pritchard regarding payment of same (.3); review financial reporting from property manager (.2); draft correspondence to J. Rak regarding property expenses (7051 Bennett, 8201 S Kingston, 8047 Manistee, 7749 S. Yates) (.2).
		Business Operations
9/16/2020	KBD	0.30 Attention to real estate taxes and correspondence with adjuster regarding potential additional claim amount (638 Avers) (.2); exchange correspondence with J. Rak regarding same (.1).
		Business Operations
9/17/2020	KBD	0.80 Analysis of real estate taxes, payments, and communications with property managers and lenders (.7); exchange correspondence with K. Pritchard regarding property manager expenses (.1).
		Business Operations
9/18/2020	KBD	0.40 Study draft order for second restoration motion and exchange correspondence regarding same (.2); exchange correspondence with J. Rak and K. Pritchard regarding payment of real estate taxes and water bills (.2).
		Business Operations
9/21/2020	KBD	0.50 Exchange correspondence with insurance adjuster regarding negotiations on claims (638 Avers) (.2); study correspondence from K. Pritchard regarding water bill payment planning (7109 S Calumet, 7656 S Kingston, 7237 S Bennett, 7201 S Constance) (.2); exchange correspondence with K. Pritchard regarding restoration of funds (.1).
		Business Operations
9/22/2020	KBD	0.30 Study correspondence from J. Rak regarding payment of real estate taxes (.2); attention to utility payments (2736 64th St, 1401 W 109th, 6356-58 S. California, 6357-59 S Talman, 7656-58 S Kingston) (.1).
		Business Operations
9/23/2020	KBD	0.50 Attention to funds transfers for restoration (.2); exchange correspondence regarding claim involving property (7546 Saginaw) (.3).
		Business Operations
9/24/2020	KBD	0.60 Study and exchange correspondence regarding administrative hearings relating to property (7456 Saginaw) (.3); exchange correspondence with K. Pritchard regarding utility payments (2736 64th St, 1401 W 109th, 6356-58 S. California, 6357-59 S Talman, 7656-58 S Kingston) (.3).
		Business Operations
9/25/2020	KBD	0.30 Exchange correspondence with J. Rak regarding real estate taxes (.1); exchange correspondence with J. Wine regarding code compliance (7548 Saginaw) (.2).
		Business Operations

9/28/2020 KBD

0.60 Exchange correspondence with J. Rak and property managers regarding real estate taxes (1700 Juneway Terrace, 6250 S Mozart Avenue, 6558 S Vernon Avenue, 1414 E 62nd, 4611 S. Drexel, 6217 S. Dorchester, 7255 S. Euclid, 6250 S. Mozart, 7109 S. Calumet, 11318 Church, 406 E 87th Place, 61 E 92nd, 7210 Vernon, 6759 Indiana, 1131 E 79th, 7508 Essex Ave).

**Business Operations** 

9/29/2020 KBD 0.20 Attention to real estate taxes (5618 MLK, 7600 Kingston).

**Business Operations** 

SUBTOTAL: [ 7.20 2808.00]

#### Claims Administration & Objections

9/1/2020 KBD

5.40 Exchange correspondence with claimant's counsel regarding property expenses (7760 Coles, 8107 Ellis, 8209 Ellis, 8214 Ingleside, 8000 Justine) (.2); work on same, study records and spreadsheets regarding property expenses and exchange correspondence with K. Pritchard, J. Wine, and property manager regarding same (8107 Ellis, 8209 Ellis, 8214 Ingleside, 8000 Justine) (2.3); review statistical graphs of claims data for Judge Lee (.1); work on reply to objections to ninth sales motion (1139 E 79th and 6250 Mozart) (2.5); review correspondence from real estate broker regarding claimant's objections to sales motion (1139 E 79th and 6250 Mozart) (.1); study correspondence from claimants' counsel regarding request for records (.1); review claim information and communication with claimant's counsel (.1).

Claims Administration & Objections

9/2/2020 KBD

5.00 Work on reply to objections to ninth sales motion (1139 E 79th and 6250 Mozart) (4.1); analyze property expenses and exchange various correspondence regarding same (7760 Coles, 8107 Ellis, 8209 Ellis, 8214 Ingleside, 8000 Justine) (.6); exchange correspondence with claimant's counsel regarding status of insurance claim (638 Avers) (.1); attention to response to claimant's counsel regarding estate of claimant (.2).

Claims Administration & Objections

9/3/2020 KBD

0.30 Exchange correspondence with A. Watychowicz regarding rollovers and related documentation.

Claims Administration & Objections

9/4/2020 KBD

5.90 Work on claims process and evaluate change in institutional lenders' position on priority determination (.5); investigate and review information regarding due diligence materials and property marketing (1131-41 E. 79th Pl) (.4); exchange correspondence with J. Wine regarding judgment orders and communication with collection counsel (431 E 42nd Pl, 8342 S Ellis, 5955

Date	Indiv H	lours	Description
			Sacramento) (.3); draft and revise correspondence to claimants' counsel regarding request for claims information and EB documents (.5); draft response to claimants' objection to ninth sales motion (1131-41 E. 79th Pl, 6250 S. Mozart) (4.1); exchange correspondence with claimants' counsel regarding property expenses (7760 Coles, 8107 Ellis, 8209 Ellis, 8214 Ingleside, 8000 Justine) (.1).
			Claims Administration & Objections
9/5/2020	KBD	1.00	Draft response to claimants' objection to ninth sales motion (1131-41 E. 79th Pl, 6250 S. Mozart).
			Claims Administration & Objections
9/6/2020	KBD	2.00	Draft and revise response to claimants' objection to ninth sales motion (1131-41 E. 79th PI, 6250 S. Mozart).
			Claims Administration & Objections
9/7/2020	KBD	2.00	Draft reply to objections to ninth sales motion (1131-41 E. 79th Pl, 6250 S. Mozart) (1.8); attention to messages from claimant regarding update (.2).
			Claims Administration & Objections
9/8/2020	KBD	5.20	Draft response to objections to ninth sales motion (1131-41 E. 79th Pl, 6250 S. Mozart) (5.0); exchange correspondence regarding claimant's debt collection efforts (.1); work on response to claimant regarding claims update (.1).
			Claims Administration & Objections
9/9/2020	KBD	7.70	Draft response to objections to sales motion (1131-41 E 79th, 6250 Mozart) (2.5); review property expenses to address claimant objection to restoration motion (7760 Coles, 8107 Ellis, 8209 Ellis, 8214 Ingleside, 8000 Justine) (5.2).
			Claims Administration & Objections
9/10/2020	) KBD	5.00	Draft reply to opposition to second restoration motion (5450-52 S. Indiana, 7749-59 S. Yates) (2.5); exchange correspondence various correspondence regarding same (5450-52 S. Indiana, 7749-59 S. Yates) (.7); review property expenses, draft correspondence to claimant's counsel regarding objection to second restoration motion, and exchange correspondence with A. Watychowicz relating to same (7760 Coles, 8107 Ellis, 8209 Ellis, 8214 Ingleside, 8000 Justine) (1.3); study correspondence regarding standard discovery requests (.2); work on response to claimant regarding claims process (.1); attention to correspondence from claimants' counsel regarding request for claims forms (.2).
			Claims Administration & Objections
9/11/2020	) KBD	5.00	Revise reply to opposition to second restoration motion (.6); study and revise draft reply to objection to ninth sales motion (1131-41 E. 79th PI, 6250 S. Mozart) (4.4).

Claims Administration & Objections

Date Indiv H	ours Description
9/12/2020 KBD	1.50 Draft and revise reply to objection to ninth sales motion (1131-41 E. 79th PI, 6250 S. Mozart).
	Claims Administration & Objections
9/13/2020 KBD	3.10 Draft and revise reply to objection to ninth sales motion and exchange various correspondence with M. Rachlis (1131-41 E. 79th PI, 6250 S. Mozart).
	Claims Administration & Objections
9/14/2020 KBD	2.60 Work on reply to ninth sales motion objections (1131-41 E. 79th Pl, 6250 S. Mozart) (1.5); confer with M. Rachlis and J. Wine regarding claimants' motion for determination on properties (7110 Cornell, 6751 Merrill), ninth sales motion (1131-41 E. 79th Pl, 6250 S. Mozart), second restoration motion, and various related issues (.5); study court orders and exchange correspondence regarding same (.3); exchange correspondence with claimant counsel regarding single family residence portfolio (.1); exchange correspondence with J. Wine regarding claim from debt collection counsel regarding property (431 E. 42nd) (.1); work on correspondence with claimants' counsel regarding request for claims forms (.1).
	Claims Administration & Objections
9/15/2020 KBD	1.50 Review correspondence from claimants and related correspondence (.2); work on response to objections to ninth sales motion (1131-41 E. 79th PI, 6250 S. Mozart) (.4); exchange correspondence with claimants' counsel regarding property expenses and resolution of objection (7760 Coles, 8107 Ellis, 8209 Ellis, 8214 Ingleside, 8000 Justine) (.1); work on response to objections to second restoration motion (5450-52 S. Indiana, 7749-59 S. Yates) (.8).
	Claims Administration & Objections
9/16/2020 KBD	1.10 Attention to claimant communications and exchange correspondence with J. Wine regarding same (.5); study correspondence regarding standard discovery and exchange correspondence with M. Rachlis and J. Wine regarding same (.4); study draft data charts for the court (.2).
	Claims Administration & Objections
9/17/2020 KBD	1.10 Confer with J. Wine regarding claims analysis against properties and funds (.1), claims and amounts relating to properties (7110 Cornell, 6751 Merrill) (.4), and claims discovery, analysis criteria, and planning (.2); exchange correspondence with claimant counsel and with J. Rak regarding payment of real estate taxes (4611 S. Drexel, 6217 S. Dorchester, 7255 S. Euclid, 6250 S. Mozart, 7109 S. Calumet, 1131 E. 79th Pl.) (.2); study and exchange correspondence regarding claims data charts (.2).

Claims Administration & Objections

Date	Indiv	Hours Description
9/18/2020	KBD	0.50 Attention to standard discovery requests (.2); study and work on response to claimant regarding property (1102 Bingham) (.2); review information regarding claims (7110 Cornell, 6751 Merrill) (.1).
		Claims Administration & Objections
9/21/2020	KBD	1.10 Telephone conference with SEC (.2); confer with J. Wine regarding claims charts and document vendor (.4); exchange correspondence with J. Wine and M. Rachlis regarding discovery and filing for court (.2); work on claims process structure (.3).
		Claims Administration & Objections
9/22/2020	KBD	2.90 Work on standard discovery requests, confidentiality order, claims amount charts, and status report and confer with M. Rachlis and J. Wine regarding same (2.5); draft correspondence to claimant regarding property marketing (1102 Bingham) (.2); attention to correspondence with claimants (.2).
		Claims Administration & Objections
9/23/2020	KBD	4.20 Prepare for hearing before Judge Lee on claims (1.8); appear for hearing before Judge Lee (1.3); attention to standard discovery requests (.3); work on responses to and communications with claimants (.6); draft correspondence to investor claimants relating to claimant request (.2).
		Claims Administration & Objections
9/24/2020	KBD	0.60 Study and revise correspondence to investor claimants regarding investor claimant (.3); work on communications with claimants (.3).
		Claims Administration & Objections
9/25/2020	KBD	0.40 Work on communications with claimants.
		Claims Administration & Objections
9/26/2020	KBD	0.30 Study draft response to claimants' turnover motion (7110 Cornell, 6751 Merrill).
		Claims Administration & Objections
9/28/2020	KBD	2.60 Study claimant motion for priority determination and turnover, draft and revise response, and study information relating to same (7110 Cornell & 6751 Merrill) (2.3); attention to claimant communications (.1); study draft status report on unresolved matters (.2).
		Claims Administration & Objections
9/29/2020	KBD	3.30 Work on response to claimants' motion for priority determination and turnover of sale proceeds (7110 Cornell, 6751 Merrill) (2.6); work on status report on unresolved motions (.4); review standard written discovery (.3).
		Claims Administration & Objections

Date	Indiv	Hours Description		
9/30/202	20 KBC	2.00 Work on response to claimants' motion for priority deter turnover of sale proceeds (7110 Cornell, 6751 Merrill) (draft standard discovery requests and correspondence study revisions to and revise draft status report on oper resolution and correspondence regarding same (.4).  Claims Administration & Objections	1.2); study i regarding s	revised ame (.4);
SUBTOTAL:			[73.30	28587.00]
			94.10	\$36,699.00
		Summary of Activity Hours	Rate	
Kevin B. Duff		94.10	390.00	\$36,699.00

# **SUMMARY**

Legal Services	\$36,699.00
Other Charges	\$0.00
TOTAL DUE	\$36,699.00

# Exhibit G

# Case: 1:18-cv-05587 Document #: 885-1 Filed: 11/30/20 Page 60 of 190 PageID #:19320 Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

November 18, 2020

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen

No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No.6622124

Legal Fees for the period July 2020 \$91,520.00

Expenses Disbursed \$6,599.29

Due this Invoice \$98,119.29

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	Description	
Accounting/Auditing				
7/22/2020	KMP	2.40	Prepare monthly spreadsheets of receipts and disbursement for Receiver's accounts for April, May and June 2020.	
			Accounting/Auditing	
SUBTOTAL:			[ 2.40 336.0	_ 0]
Asset Analysis & Red	covery			
7/2/2020	JR	4.40	Review financial reports for March (4.2); exchange correspondence with E. Duff regarding same (.2).	
			Asset Analysis & Recovery	
7/15/2020	AW	0.30	Attention to email from government representative and respond to same.	
			Asset Analysis & Recovery	
7/20/2020	AW	0.60	Attention to electronic records issues.	
			Asset Analysis & Recovery	
SUBTOTAL:			[ 5.30 742.0	– 0]
Asset Disposition		<u>—</u>		
7/1/2020	KMP	0.20	Review bank records and communicate with J. Rak regarding receipt of funds for recent closing (8214 Ingleside).	
			Asset Disposition	
	JRW	0.30	Proof and correct publication notice.	
			Asset Disposition	
	AEP	4.90	Teleconference with counsel for purchaser of receivership property (6949 S Merrill) regarding motion to intervene, implications of same on pending motion to confirm sales, and timing of transaction (.4); attend closing of sale of receivership property (8209 S Ellis) (3.8); numerous communications with counsel for prospective purchasers of all properties in next sales tranche regarding delivery of due diligence materials, receipt of earnest monies, and completion of additional documentation authorizing same (.7);.  Asset Disposition	
	JR	5.10	Attend closing (8209 S. Ellis) (3.8); produce and organize all financial documents for March in preparation for review (1.3).	

Date	Indiv	Hours Description
		Asset Disposition
7/2/2020	KMP	0.60 Several communications with bank representative and K. Duff, A. Porter, and J. Rak regarding details and issues relating to receipt of proceeds for sale of properties.
		Asset Disposition
7/3/2020	AEP	4.20 Begin preparation of reply memorandum in support of motion to confirm sales of receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) (3.7); research points of law associated with motion to intervene and ensuing objections to sale (.5).
		Asset Disposition
7/4/2020	AEP	5.10 Continue preparing reply in support of motion to confirm sales of receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) (3.5); review and revise all closing documents associated with sale of receivership property (11117 S Longwood) following change in identity of purchaser's nominee (.7); prepare communications with both counsel for purchaser of receivership property (11117 S Longwood) and management company regarding approval of seller documents, eviction and security deposit indemnification issues, and requests for original leases (.5); prepare e-mails to property managers identifying properties now under contract and requesting no further capital expenditures or lease renewals absent receivership permission (.1); communications with receivership brokers regarding history of negotiations associated with sales of receivership properties subject to motion to intervene (7600 S Kingston, 7656 S Kingston, and 6969 S Merrill) (.3).
		Asset Disposition
7/5/2020	AEP	3.30 Continue preparing reply in support of motion to confirm sales of receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill).
		Asset Disposition
	MR	1.20 Review issues on intervenor reply and work on same (7600 Kingston, 7656 Kingston, and 6949 Merrill).
		Asset Disposition
7/6/2020	AEP	3.50 Teleconference with counsel for prospective purchaser of receivership property (7300 S St Lawrence) regarding request for closing credit and scheduling of closing (.1); correspondence with counsel for prospective purchaser of receivership property (11117 S Longwood) regarding requested revisions to various seller documents (.2); review, inventory, and revise all closing documents for sale of receivership property (7300 S St Lawrence) (.6); communications with counsel for purchaser of receivership property regarding rescheduling of closing and other requested changes to closing documents (.2); update all closing documents for receivership property (11117 S Longwood) to modify street address (.3); review status of earnest money deposits for each property in next sales tranche and prepare memorandum to title company regarding amount expected, status of receipt, documents still needed, and other issues, prepare new joint order

escrow agreements and communicate with prospective purchaser of receivership property (1131 E 79th and 3074 E Cheltenham) regarding need for new signatures (1.3); review rent roll for receivership property (11117 S Longwood), update settlement statement rent prorations and prepaid rent credits, and prepare e-mail to buyer's counsel attaching latest drafts (.8).

#### **Asset Disposition**

7/6/2020 JR

5.20 Follow up with property manager relating to the income/expense statements for property (4755 Lawrence) (.1); exchange correspondence with K. Duff regarding same (4755 Lawrence) (.2); exchange correspondence with the property management regarding updated financial reports for closing (11117 Longwood) (.1); follow up with leasing manager regarding new leases for property (11117 Longwood) (.1); review email from buyer's counsel regarding sale of property (11117 Longwood) and forward requested information for closing (.2); review and update notice to tenants and property transfer tax declaration for closing (11117 Longwood) (1.9); exchange correspondence with buyer's counsel regarding same (11117 Longwood) (.1); review tenant ledgers for all tenants related to property (11117 Longwood) (.9); update certified rent roll regarding same (.8); review correspondence from buyer's counsel and provide requested information for closing related to request to change closing date (11117 Longwood) (.1); exchange correspondence with property management regarding coordination of keys and original leases (11117 Longwood) (.2); exchange correspondence with the real estate brokers regarding same (11117 Longwood) (.1); exchange correspondence with K. Pritchard regarding confirmation of wire instructions for property's net proceeds (8107 S. Ellis and 8209 S. Ellis) (.1); draft proceeds disbursement instructions regarding same (8107 S. Ellis and 8209 S. Ellis) (.1); further correspondence with the title company regarding same and request to disburse funds relating to same (8107 S. Ellis and 8209 S. Ellis) (.2).

#### Asset Disposition

JR 1.20 (Continued) Exchange correspondence with the leasing manager requesting additional property information required for closing (8107 S. Ellis and 8209 S. Ellis) (.1); exchange correspondence with all parties regarding the rescheduled closing confirmation of property (11117 Longwood) (.2); exchange correspondence with real estate broker regarding delivery of keys and leases (8107 S. Ellis and 8209 S. Ellis) (.1); update closing documents reflecting new closing date (11117 Longwood) (.8).

Asset Disposition

MR 1.00 Further attention to intervenor (7600 Kingston, 7656 Kingston, 6949 Merrill) brief.

**Asset Disposition** 

7/7/2020 AEP

0.40 Communications with receivership brokers regarding status of due diligence negotiations with prospective purchaser of receivership property (1700 W Juneway) (.1); communications with counsel for prospective purchaser of receivership properties (6558 S Vernon and 7201 S Constance) regarding

#### <u>Date</u> <u>Indiv</u> <u>Hours</u> <u>Description</u>

lack of receipt of earnest money (.1); communications with counsel for prospective purchaser of receivership properties (6436 W 64th, 6355 S Talman, 5618 S King, and 6356 S California) regarding lack of receipt of earnest money and requested confirmation of lack of assignment of purchaser's duties under purchase and sale agreements (.2).

Asset Disposition

7/7/2020 JR

3.00 Review email from K. Pritchard regarding closed properties and account numbers for each property net proceeds (.1); update spreadsheet with all bank account numbers and exchange correspondence with K. Pritchard regarding same (.5); update unit size information on certified rent roll (11117 Longwood) (.3); review closing documents with the updated address (11117-39 S. Longwood) (.3); review lien waivers and exchange correspondence with A. Porter relating to address update (11117-39 S. Longwood) (.1); review updated rent roll from accounting manager and update the certified rent roll for closing (11117 S. Longwood) (.4); review email from real estate broker and forward requested due diligence documents to the buyer for property (7201 Constance) (.2); review recently entered Purchase and Sale Agreements and update property spreadsheet with all pertinent sale information (7201 S. Dorchester, 6356 S. California, 2736 W. 64th, 6355 S. Talman, 3074 Cheltenham, 5618 S. Martin Luther King, 6250 S. Mozart and 1131 E. 79th, 7201 S. Constance, 7957 S. Marguette, 7051 S. Bennett, 7508 S. Essex, 6554 S. Vernon) (1.1).

**Asset Disposition** 

7/8/2020 AEP

JR

7.30 Oversee finalization and execution of seller documentation in connection with closings of receivership properties (11117 S Longwood and 7300 S St Lawrence) (1.1); attend closing of sale of receivership property (11117 S Longwood), finalize rent roll and water prorations, complete deed and money escrow instructions, review settlement statements, and negotiate with buyer's counsel over remaining issues (1.7); teleconferences with counsel for prospective purchaser of receivership property (7300 S St Lawrence) regarding receiver's refusal to extend closing credit or refund earnest money (.2); communications with counsel for prospective purchaser of receivership property (1700 W Juneway) regarding receiver's refusal to agree to repair credits (.2); continue drafting, editing, and revising reply in support of eighth motion to confirm sales (2.2); read final draft of proposed eighth motion to confirm with changes proposed by K. Duff and M. Rachlis and finalize same (1.6); teleconference with K. Duff regarding final modifications to proposed eighth motion to confirm sales and make requested changes. (.3).

**Asset Disposition** 

AW 0.20 Attention to motions to intervene (7600 Kingston, 7656 Kingston, 6949 Merrill) and notify counsel of same.

**Asset Disposition** 

5.00 Exchange correspondence with K. Duff regarding signing of documents for property (11117 Longwood) (.1); exchange correspondence with the property management team regarding required updated financial reports for closing related to same (11117 Longwood) (.3); work with K. Duff and A.

# <u>Date</u> <u>Indiv Hours Description</u>

Porter on execution of all closing documents (11117 Longwood) (.8); update rent roll related to same (11117 Longwood) (.3); exchange correspondence with the buyer's counsel regarding same (11117 Longwood) (.1); update notices to tenants regarding same (11117 Longwood) (.3); attend closing regarding same (11117 Longwood) (3.0); exchange correspondence with various parties regarding confirmation of closed property (11117 Longwood) (.1).

**Asset Disposition** 

7/8/2020 MR

2.10 Attention to various emails and issues regarding draft orders on sales issues (.3); further attention and work on reply to intervenor (7600 Kingston, 7656 Kingston, 6949 Merrill) response (1.8).

Asset Disposition

ΑW

2.30 Communications with M. Rachlis regarding purchase and sale agreements for properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) for old and new potential buyer (.7); communicate with counsel regarding reply in support of eight motion to approve sales, proofread reply and draft certificate of service, attention to email exchanges regarding revisions, finalize reply, file with the court, and serve as per service list (1.6)

**Asset Disposition** 

7/9/2020 JR

0.80 Exchange correspondence with property management regarding new buyer information for property (11117 Longwood) (.1); review most recent T12 for single family homes and save in electronic folders (.6); exchange correspondence with A. Porter regarding single family portfolio updates (.1).

**Asset Disposition** 

7/10/2020 AEP

0.30 Communications with counsel for prospective purchaser of receivership property (7300 S St Lawrence) and schedule closing (.1); review and analyze status of receipt of earnest monies associated with current sales tranche and prepare e-mail to title company seeking confirmation of recent deposits by prospective buyers (.2).

**Asset Disposition** 

JR

6.20 Exchange correspondence with A. Porter regarding the single family portfolio required updates to master due diligence spreadsheet (.2); update master single family portfolio spreadsheet with pertinent property information for 37 single family homes (5.8); exchange correspondence relating to new buyer information (11117 Longwood) (.1); exchange correspondence with property management requesting updated due diligence material for single family homes in preparation for listing (.1).

**Asset Disposition** 

7/13/2020 JR

4.90 Follow up correspondence with buyer's counsel regarding required buyer information for closing of property (7300 S. St. Lawrence) (.2); review email from the utility manager regarding updated utility bills and organize for single family homes (.2); exchange correspondence with property management

regarding updates to due diligence documents for single family homes (.1); telephone conference with J. Porter, A. Watychowicz regarding single family homes and investigation process related to financial documents (.6); review brokers marketing spreadsheet relating to bedroom and bath sizes, review property manager rent roll regarding same and update master spreadsheet for single family homes (1.2); further update master single family home spreadsheet with lease terms of each tenant and review inspection reports relating to bids and update the master single family spreadsheet (2.4); exchange correspondence with A. Porter regarding lease renewals for property (6356 S. California) (.1); exchange communication with the Cook County clerk's office regarding process for certification amid the pandemic (.1).

#### **Asset Disposition**

7/14/2020 AEP

1.70 Teleconference with J. Rak regarding status of completion of due diligence folders relating to single-family home portfolio and reconciliation of various sources of information into master spreadsheet (.8); review first half of administrative and housing court litigation folders for accuracy and completeness in connection with final reconciliation and payment of municipal judgments (.9).

**Asset Disposition** 

JR
5.50 Review email from leasing manager regarding new leases for property (5618 S. MLK) and advise with A. Porter regarding same (.1); review email from buyer's counsel regarding same (5618 S. MLK) (.1); review email from property management regarding bedroom bath size discrepancy for single family homes and discuss further with property manager regarding same (.2); update single family home master spreadsheet related to bid information for remainder of properties (.6); review surveys for all single family homes and

update single family home master spreadsheet related to bid information for remainder of properties (.6); review surveys for all single family homes and update master spreadsheet regarding lot size for each property (.8); review tax balances for all single family homes and update master spreadsheet (.9); exchange correspondence with property management requesting updated income and loss statements, utility bills and various other property characteristics related to all 37 single family homes (.2); review leases for lease terms and security deposits and update master single family portfolio (2.2); review utility bills requested from property manager and organize in electronic files related to single family homes (.4).

**Asset Disposition** 

7/15/2020 JR 4.40 Review emails and update master single family spreadsheet with various pertinent property information, bed/bath sizes, garage spaces, leases.

**Asset Disposition** 

7/16/2020 AEP

0.90 Teleconference with receivership brokers regarding need for purchase and sale agreements associated with next tranche of properties being marketed, status of preparation of ninth motion to confirm, resolution of existing earnest money issues, and other matters relating to planning (.4); continue reviewing and organizing all administrative judgments in preparation for resolution of all outstanding notices of violation and fines levied by City of Chicago (.5).

Asset Disposition

7/17/2020 JR

2.90 Review various property tax balances and forward to property management, request status of property income (.4); review email from property manager related to single family homes and the utility responsibility for each tenant (.1); update electronic files regarding same (.4); review email from property manager and provide requested new owner information for sold property (8326-52 S. Ellis) (.1); review emails from leasing manager and update leasing manager regarding requests from buyer for various property leasing and renewal matters (6359 S. Talman) (.3); review emails and update single family home portfolio (.8); review utility bills related to single family homes (.8).

Asset Disposition

7/18/2020 AEP

4.00 Review attorneys' packet received from title company, research tax sale implications, and prepare examiner's worksheet in connection with application for title commitment on receivership property (431 E 42nd Place) (1.0); communications with team regarding inspections at receivership property (7237 S Bennett) by Department of Buildings and analysis of litigation history of property (.4); review and analyze litigation folders to obtain information regarding nature of pending claims against properties subject to approaching administrative and circuit court status conferences and send e-mail to J. Wine providing status of sale of each property and attaching relevant deeds and closing statements (.8); read e-mails from Houston-based receivership broker containing survey bids and provide comments to K. Duff (1102 Bingham) (.1); finalize inventory and reorganization of all pleadings and orders relating to administrative and housing court proceedings on EquityBuild properties in preparation for completion of spreadsheet of judgments and submission to corporation counsel for potentially final reconciliation of all recorded and unrecorded judgments and pending proceedings against receivership properties, both current and former (1.7).

**Asset Disposition** 

7/19/2020 AEP

0.20 Communications with K. Duff, J. Wine, and counsel for purchaser of receivership property (4520 S Drexel) regarding status of administrative hearings.

**Asset Disposition** 

7/20/2020 AEP

10.50 Revise all closing documents associated with prospective conveyance of receivership property (7300 S St Lawrence) to modify name of grantee (.3); prepare purchase and sale contracts for all Chicago-based apartment properties in final sales tranche (2.4); continue reviewing, inventorying, and recording all administrative orders associated with receivership properties in connection with effort to achieve full and final accord with City of Chicago prior to final liquidation of receivership portfolio (1.8); prepare ninth motion to confirm sales of receivership properties (5.5); correspondence with counsel for prospective purchaser of receivership property (7201 S Dorchester) regarding purchaser's failure to execute required earnest money deposit authorization form, return of wired funds, potential invocation of default, and effect of exclusion of said property from ninth motion to confirm (.3); prepare e-mail to title underwriter identifying purchase prices of all properties in current sales tranche and requesting title invoices with accurate owner's

<u>Date</u> <u>Indiv</u> <u>Hours</u> <u>Description</u>

policy premiums in connection with finalization of ninth motion to confirm sales (.2).

**Asset Disposition** 

7/20/2020 JR

3.60 Exchange correspondence with the property managers regarding the availability of funds for payment of property taxes or various properties (.1); follow up correspondence with buyer's counsel and paralegals regarding several requests for buyer information related to completion of documents in preparation for sale of property (7300 S. St. Lawrence) (.2); review closing documents, update name of buyer, closing date and draft property transfer tax declaration regarding same (7300 S. St. Lawrence) (.9); further exchange correspondence with the property management team regarding requested financial documents needed to close relating to same (7300 S. St. Lawrence) (.1); review due diligence documents received from property manager and save in electronic folders in preparation for sale of property (7300 Lawrence) (.2); review email from buyer's counsel and exchange correspondence with the leasing manager relating to request not to renew or lease building under contract (5618 Martin Luther King) (.2); review surveys for all single family homes and update master due diligence spreadsheet related to garage space for each property (1.2); exchange correspondence with property management regarding discrepancies based on rent roll and leases provided and number of units for property (1401 W. 109th) (.2); review the master single family homes EB spreadsheet and compile a list of missing subsidy agreements and find all discrepancies (.5).

**Asset Disposition** 

JR 3.70 Exchange correspondence with property management regarding missing items related to single family homes (.3); review utility statements for all single family homes and update master single family due diligence spreadsheet (2.9); exchange correspondence with property management requesting missing items (.3); exchange correspondence with property management requesting same (.2).

**Asset Disposition** 

7/21/2020 JRW

0.40 Review draft ninth motion to confirm sales and provide dates of publication notices.

Asset Disposition

AEP 3.00 Review title commitment for receivership property (431 E 42nd Place) and transmit same to surveyor (.1); review revised title commitments and title invoices on all properties subject to ninth motion to confirm sales, record owner's premiums on portfolio spreadsheet (.5); read comments from K. Duff and J. Wine on ninth motion to confirm sales, communications with title company regarding state of receipt of earnest money associated with receivership property (7201 S Dorchester), finalize memorandum, prepare proposed order granting ninth motion to confirm sales, and prepare exhibit to proposed order (2.4).

**Asset Disposition** 

#### <u>Date</u> <u>Indiv</u> <u>Hours</u> <u>Description</u>

7/21/2020 JR

5.00 Review email from property management and the requested subsidy agreements regarding the single family home portfolio (.2); save in electronic folders and update master due diligence spreadsheet regarding same (.5); review email from property management related to requested due diligence documents (.2); organize electronic files and update master due diligence spreadsheet related to single family homes (.5); exchange correspondence with property manager regarding additional information pertaining to single family homes (.2); review email from buyer's counsel regarding requested buyer information required for closing (7300 S. St. Lawrence) (.1); further correspondence with buyer's counsel regarding same (7300 S. St. Lawrence) (.1); review rent roll, ledgers and delinquency report and draft certified rent roll regarding same (7300 S. St. Lawrence) (1.2); exchange correspondence with property management requesting additional information for same (7300 S. St. Lawrence) (.2); draft notice to tenants for property (7300 S. St. Lawrence) in preparation for sale (.7); update closing documents (7300 S. St. Lawrence) (.5); review email from K. Pritchard and provide closing status for various properties (.2); review leases provided by property leasing manager and organize electronic files for various single family homes (.2); update master due diligence spreadsheet regarding same (.2).

#### **Asset Disposition**

7/22/2020 AEP

2.60 Prepare for and oversee execution of closing documents in connection with conveyance of receivership property (7300 S St Lawrence) (.4); review of relevant due diligence materials and conference with J. Rak regarding status of preparation of due diligence documentation in connection with conveyance of single-family home portfolio (1.1); teleconference with counsel for purchaser of receivership property (7300 S St Lawrence) regarding closing-related issues, including special exceptions, settlement statement, and COVID-related procedures (.2); review and analyze property tax notices (.1); prepare communication to counsel for institutional lender regarding status of completion of due diligence folders associated with single-family homes (.2); consult Cook County tax records, City of Chicago payoff letter, title invoice, and other documents and prepare seller's closing figures in connection with closing of receivership property (7300 S St Lawrence) (.6).

#### **Asset Disposition**

JR 2.50 Produce closing documents for execution in preparation for closing (7300 S. St. Lawrence) (.5); attend signing of documents (7300 S. St. Lawrence) (.5); update notices to tenants and exchange correspondence with property management regarding same (7300 S. St. Lawrence) (.2); meeting with A. Porter regarding single family homes master due diligence spreadsheet (.7); exchange correspondence with property management and requesting litigation documents (.2); review various closed properties related to current insurance and inspection issues (.1); exchange correspondence with the title company providing buyer's counsel and lender information related to closing (7300 S. St. Lawrence) (.1); review email from property management regarding updates to due diligence documents for single family homes, request information regarding discrepancies in subsidy agreements and rent roll previously provided (.2).

Asset Disposition

Indiv Hours Description Date 7/23/2020 KMP 4.40 Study and revise consolidated motions and prepare and revise exhibits, and numerous communications with EB team regarding same. Asset Disposition **JRW** 0.40 Communicate with A. Porter regarding publication notices and certificates (.3); review draft of consolidated motion (.1). Asset Disposition **AEP** 0.50 Communications with title company and corporation counsel regarding discrepancies in payoff letter received from City of Chicago in connection with closing of receivership property (7300 S St Lawrence) (.2); review rent roll and water bills and prepare rent and utility prorations in connection with anticipated closing of receivership property (7300 S St Lawrence) (.3). Asset Disposition JR 0.80 Follow up correspondence with buyer's counsel regarding status of new leases and renewals for property under contract (6359 S. Talman) (.1); exchange correspondence with property management regarding same (6359 S. Talman) (.1); renumber exhibits related to the consolidated motion (.6). Asset Disposition 7/24/2020 AEP 3.90 Attend dry closing of sale of receivership property (7300 S St Lawrence). Asset Disposition JR 5.20 Exchange correspondence with the account manager regarding updates required for closing (7300 S. St. Lawrence) (.1); review updated financial reports, rent roll, ledgers and delinquency report and update certified rent roll required for closing (7300 S. St. Lawrence) (.8); follow up correspondence with property management regarding single family home due diligence document request (.1); exchange correspondence with the closing agent regarding documents needed for closing (7300 S. St. Lawrence) (.1); attend closing (7300 S. St. Lawrence) (3.9); exchange correspondence with property management regarding the status of closing (7300 S. St. Lawrence) (.2). Asset Disposition MR 1.20 Prepare for (.2) and participate in call regarding (638 Avers) property (.7): follow up regarding same with K. Duff (.3). Asset Disposition 7/26/2020 AEP 8.10 Prepare assignments and assumptions of rent and strict joint order escrow agreements for all properties in current marketing tranche and incorporate

same into second-checked and proofread purchase and sale contracts, and distribute proposed final agreements to receivership brokers (3.2); review all

property-specific due diligence folders associated with single-family home portfolio, eliminate duplicates, perform final reconciliation of damage repairs, cost estimates, lease documentation, and rental information and prepare e-mail to receivership broker regarding commencement of public marketing campaign (2.4); continue reviewing and inventorying all municipal and housing court violations associated with receivership properties and completion of spreadsheet of outstanding judgments (2.5).

#### **Asset Disposition**

#### 7/27/2020 KMP

**AEP** 

0.20 Communications with K. Duff and J. Rak regarding spreadsheet relating to sold properties, and status of receipt of proceeds from property sale (7300 St Lawrence).

5.40 Finalize review, analysis, and inventory of all municipal administrative and

#### **Asset Disposition**

housing court violation orders, finalize spreadsheet, divide spreadsheet into properties still owned and properties sold, judgments paid and unpaid, cases for which outcomes are unknown, and cases with paid judgments, and transmit same to corporation counsel with request for final reconciliation of account balances to ensure clearance of all title exceptions prior to closing of final sales tranche (3.7); communications with buyer's counsel and title company regarding final closing of receivership property (7300 S St Lawrence) and communications with corporation counsel regarding final corrections to payoff letter (.4); prepare e-mail to all counsel for purchasers of property in ninth sales tranche regarding filing of motion to confirm and expected closing timelines based on potential third-party objections (.2); begin review of all surveys in single-family residence portfolio in connection with identification of encroachments likely to trigger demands for title insurance

endorsements (.5); read e-mail from counsel for institutional lender seeking information regarding status of conveyances and send closing statements from corresponding conveyances (.1); review spreadsheet of active administrative and housing court proceedings received from J. Wine and reconcile same with spreadsheet separately assembled to track all

#### **Asset Disposition**

known receivership actions (.5).

JR 3.40 Review email from buyer's counsel's paralegal regarding closing information (7300 S. St. Lawrence) (.1); exchange correspondence with K. Duff regarding closed property information (.1); review email from K. Pritchard and update closed property information with property account balances (.2); review single family portfolio and request additional updates from the property manager (.6); exchange correspondence with the title company's agent regarding status of closing (7300 S. St. Lawrence) (.1); review email from J. Wine regarding requested status report information related to properties status (.1); provide J. Wine with requested information regarding same (1.6); review email from buyer's counsel regarding property leases and renewals (6359 S. Talman) (.1); exchange correspondence with the leasing manager regarding same (6359 S. Talman) (.1); review email from buyer regarding requests for property related to preparation for closing (7110 S. Cornell) (.1); further correspondence with buyer regarding same (7110 S. Cornell) (.1); review email from property management regarding closing and advise of same (7300 S. St. Lawrence) (.1); exchange communication with all parties regarding

confirmation of closing of property (7300 S. St. Lawrence) (.1).

Asset Disposition

7/28/2020 AEP

1.40 Final communications with paralegals and buyer's counsel regarding closing of sale of receivership property (7300 S St Lawrence), including completion of settlement statement and delivery of notices to tenants (.2); teleconference with J. Rak regarding preparation of closing documents in connection with properties subsumed within ninth motion to confirm sales (.3); completion of communications with receivership real estate broker regarding status of due diligence folders in connection with marketing of single-family home portfolio (.1); communications with counsel for purchaser of receivership property (7110 S Cornell) regarding scheduling of closing (.1); review updated title commitments on all but two receivership properties in final marketing tranche and revise portfolio spreadsheet accordingly (.4); read e-mails from buyers' counsel and request closing dates for five properties in ninth sales tranche (.3).

**Asset Disposition** 

JR 3.30 Review email from K. Pritchard regarding confirmed net proceeds received from closing (7300 S. St. Lawrence) (.1); update closed property spreadsheet in electronic files related to closed property (7300 S. St. Lawrence) (.1); review email from real estate broker regarding updates to due diligence documents for single family homes and respond regarding same (.2); finalize notice to tenants and forward copies to buyer's counsel (7300 S. St. Lawrence) (.2); review requested due diligence documents and request additional missing items from property management regarding single family homes (.4); exchange correspondence with A. Porter regarding same (.1); review requested water bills for all single family homes and update property folders and update master single family homes spreadsheet (1.2); review property water certificate status (7110 S. Cornell) (.1); exchange correspondence with the title company submitting application regarding same (7110 S. Cornell) (.2); exchange communication with the property management team regarding various properties that will be going under contract and request due diligence documents for future production to buyers (.2); exchange communication with other property management team regarding same (.2); exchange correspondence with buyer's counsel regarding closing of property (7110 S. Cornell) (.2); exchange correspondence with the real estate broker regarding requested closed property information (7300 S. St. Lawrence) (.1).

**Asset Disposition** 

7/29/2020 AEP

2.00 Review title commitments for all properties subject to ninth motion to confirm sales and prepare list of special exceptions and other title-related issues requiring resolution prior to closings (1.6); teleconference with receivership brokers regarding state of closing on all properties in prior marketing tranches (.2); communications with corporation counsel regarding final reconciliation of administrative judgments (.2).

**Asset Disposition** 

Kevin B. Duff, Receiver Page 14

#### Date Indiv Hours Description

7/29/2020 JR

4.10 Review email from property management and reply with requested information for previously sold property (7450 S. Luella) (.2); review email from property management regarding request for settlement statement from closed property (7300 S. St. Lawrence) (.1); review emails from A. Porter regarding requests for scheduling of property and update spreadsheet with closing dates and times for various properties (.2); review closing confirmation received from the title company and organize in property folders for various properties (.1); exchange correspondence with the property management team regarding same and request updated rent rolls for closings of various properties (.2); exchange correspondence with the real estate brokers regarding same and requesting commission statements for properties which are scheduled to close (.2); prepare water certificate applications for properties (3074 Cheltenham, 6250 S. Mozart, 1131 E. 79th) (.8); update closing checklists regarding same and related to various property information required to submit applications for water (3074 Cheltenham, 6250 S. Mozart, 1131 E. 79th) (1.1); exchange correspondence with the title company submitting the completed water applications for processing (3074 Cheltenham, 6250 S. Mozart, 1131 E. 79th) (.2); exchange correspondence with the title company requesting earnest money receipts for various properties under contract (.2); review email from the title company regarding water certificate applications and request the title company to update title commitments with buyer information for completion of water applications for various properties (.2): Review email from property manager regarding rent rolls and organize property folders for various properties (.2); review updated title commitments reflecting buyer information (.3); exchange correspondence with title company regarding same and to process water applications (.1).

**Asset Disposition** 

7/31/2020 JR

0.20 Review email from buyer's counsel regarding information related to buyer name on title and update closing checklists for properties (1131 79th, 6250 Mozart and 3074 Cheltenham).

**Asset Disposition** 

SUBTOTAL: 163.70 42725.00]

**Business Operations** 

7/1/2020 KMP

2.60 Various communications and conferences with EB team regarding form of and information for exhibits to proposed restoration motion (.3); review various spreadsheets and other information and prepare spreadsheets for use as exhibits to restoration motion (2.3).

**Business Operations** 

2.10 Review draft motion regarding restoration of rent and receivership expenditures from proceeds of sale of certain properties (.6); email correspondence with M. Rachlis regarding comments, and regarding calculations (.1); telephone conference with K. Duff, M. Rachlis, and K. Pritchard regarding financial information relating to same and analysis of content to include (1.2); follow up conversation with K. Pritchard regarding

<u>Date</u>	<u>Indiv</u> l	Irs Description
		same (.1); email correspondence to M. Rachlis and K. Duff regarding calculations from with accountant of restoration amounts due from properties (.1).
		Business Operations
7/1/2020	JRW	.40 Review and comment on revisions to restoration motion (.3); related review of spreadsheet (.1).
		Business Operations
	AW	.50 Attention to property tax bills, name files, and communicate with counsel regarding same (1.8); communicate with J. Wine regarding administrative hearings, review administrative orders, and update docket (.7).
		Business Operations
	MR	.60 Conferences with K. Duff, E. Duff and K. Pritchard and attention to restoration issues.
		Business Operations
7/2/2020	KMP	continue to review various spreadsheets and other information to prepare chart for use in narrative portion of motion and communicate with K. Duff, M. Rachlis and E. Duff regarding same (3.5); prepare form for funds transfer to property manager regarding water bills (7201 S Constance, 7237 S Bennett, 8000 S Justine) and communications with K. Duff and bank representative regarding same (.3); follow-up communications with property manager regarding disposition of funds relating to same (.1).
		Business Operations
	ED	.20 Email correspondence with lender's counsel and property manager regarding financial reporting for property (7109 Calumet).
		Business Operations
7/4/2020	ED	.30 Review drafts of March accounting reports (3.7); preliminary review of May financial reporting from property managers (.4); analysis of property expenditure allocations (6217 S Dorchester) (.2).
		Business Operations
7/5/2020	ED	.20 Review summary document regarding rent restoration amounts from accountant.
		Business Operations
	JR	.30 Review email from K. Duff regarding status of income statements for property (4755 Lawrence) relating to filing 2017 taxes and exchange correspondence regarding same (.1); review email from K. Duff regarding certificate of insurance for various properties and exchange correspondence regarding same (.2).

Date	Indiv	<u>Hours</u>	Description
			Business Operations
7/5/2020	MR	1.50	Research on restoration motion and work on same.
.,0,2020			Business Operations
7/6/2020	ED	2.80	Review of comments from J. Rak regarding drafts of March accounting reports, and related documentation of March property income and expense (.6); email correspondence with accountant with comments and questions relating to March accounting report drafts (.3); review and analysis of financial reporting from property managers (.4); email correspondence with insurance agent regarding request for inspection and other insurance related information (8326-54 S Ellis, 4611-17 S Drexel, 1700 Juneway) (.1); review and analysis of calculations of amounts reimbursable from proceeds of sold properties (.7); draft description of calculation of insurance reconciliation amounts for inclusion in correspondence to lenders' counsel (.7).
			Business Operations
7/7/2020	KMP	0.30	Further communications with K. Duff and J. Rak regarding exhibits for second restoration motion (.1); review payment notice and communicate with K. Duff regarding timing and amount for upcoming payment on insurance premium funding (.2).
			Business Operations
	JR	0.60	Review property tax sale information on the Cook County treasurer's website regarding all EB properties in the estate.
			Business Operations
7/8/2020	ED	0.30	Call with K. Duff regarding second restoration motion.
			Business Operations
	AW	0.80	Communicate with K. Pritchard regarding rent restoration motion and exhibits (.1); communicate with A. Porter via email and K. Duff via telephone regarding response to motions to intervene and reply in support of receiver's eight motion to approve sale (.2); attention to email from property manager regarding allegedly scheduled inspections, research regarding same, and respond to property manager (.5).
			Business Operations
7/9/2020	KMP	0.70	Review financial records and revise exhibit for second restoration motion.
			Business Operations
	JRW	0.20	Exchange correspondence regarding property inspections and related email to corporation counsel.
			Business Operations

Indiv Hours Description Date 7/9/2020 MR 1.00 Further work on second restoration motion. **Business Operations** 1.50 Prepare forms for transfers of funds to property manager for utilities at 7/10/2020 KMP various properties and for security installations (7237 Bennett, 638 N Avers), and to financing company for installment on insurance premium financing agreement, and communications with K. Duff and bank representatives regarding same (.5); communicate with property manager regarding confirmation of funds transfers and instructions as to disposition of funds (.2): revise exhibit for motion to include information provided by accountant and communicate with K. Duff, M. Rachlis, and E. Duff regarding same (.8). **Business Operations** AW 1.60 Communicate with E. Duff regarding financial reports, prepare accounting reports for institutional lenders on property by property basis with addition of properties that have no institutional debt, and have been sold (.8); revisions to transmittal letters to institutional lenders' counsel and communications with E. Duff regarding same (.8). **Business Operations** 7/11/2020 MR 2.50 Further work and research regarding second restoration motion and affidavit and revisions to same. **Business Operations** 7/13/2020 ED 0.70 Update description and date relating to rent restoration and property reimbursement amounts in draft motion and declaration (.6); email correspondence to J. Wine regarding status of property held for sale (638 N Avers) (.1). **Business Operations JRW** 2.70 Study files for housing court matters scheduled for hearing on July 23 and prepare notes regarding same (7300-04 S St Lawrence, 8107-09 S Ellis, 7237-43 S Bennett, 6749-59 S. Merrill, 638-40 N. Avers, 7201 S Constance, 7600 S. Kingston, 7110 S Cornell, 6217-27 S Dorchester) (2.2); related email exchange with corporate counsel (.1); correspond with A. Porter regarding status of property sales (.3); correspond with K. Duff and A. Watychowicz regarding property inspections (.1). **Business Operations** AW 1.70 Attention to current draft of rent restoration motion, proofread and cite check same, draft notice as per standing order, and email counsel regarding revisions. **Business Operations** 

Date	Indiv	<u>Hours</u>	Description
7/13/2020	MR	1.50	Further work on and revise second restoration motion.
			Business Operations
7/14/2020	JRW	1.00	Research regarding code violations at property (7237 S Bennett) and related correspondence with property manager (.4); email exchange with E. Duff regarding property (638 N. Avers) (.1); telephone conference with corporate counsel regarding matters set for hearing (.2); review and revise draft settlement agreement in pending litigation (.3).
			Business Operations
7/15/2020	AW	0.50	Attention to notices from administrative court (2514-20 E 77th St, 7656-58 S Kingston, 7109-11 S Calumet, 2527-29 E 76th St, 7600-10 S Kingston Ave, 416-24 E 66th St, 7546-48 S Saginaw Ave), docket update, and email J. Wine regarding same.
			Business Operations
7/16/2020	JRW	0.20	Review exchange with property manager regarding accounts payable for properties (8201 S Kingston, 7749 Yates, 8047 Manistee and 7051 Bennett).
			Business Operations
	MR	0.90	Review and revise restoration motion and follow up regarding same.
			Business Operations
7/17/2020	ED	0.60	Further review and revision of draft declaration and motion relating to restoration motion (.3); email correspondence with K. Duff regarding same (.2); email correspondence to A. Watychowicz regarding content of exhibits (.1).
			Business Operations
	JRW	2.60	Study spreadsheet from property manager regarding accounts payable for properties (8201 S Kingston, 7749 Yates, 8047 Manistee and 7051 Bennett) and related email exchange with K. Duff regarding motion practice related to same (.3); prepare for code violation hearings (6558 S Vernon, 4520 S Drexel) and related communications with city counsel regarding amount of fine, A. Watychowicz regarding docketing, property manager regarding payment of fine, and K. Duff regarding for sold properties (1.4); exchange correspondence with A. Porter and J. Rak regarding pending housing court matters (.2); update records regarding pending housing court matters and related email to corporate counsel regarding status of property sales (.5); exchange correspondence with K. Duff regarding hearing related to sold property (4520 S Drexel) (.2).
			Business Operations
	AW	0.70	Email exchanges with K. Duff and E. Duff regarding exhibits to second restoration motion (.2); compile exhibits and follow up with counsel regarding same (.3); communicate with J. Wine regarding administrative hearing

Date Indi	Hours Description
	scheduled for July 20, 2020 (6558 S Vernon, 4520 S Drexel) and update docket (.2).
	Business Operations
7/18/2020 JR	0.50 Correspond with A. Porter regarding property inspections and code violations at properties with pending housing court matters (7300-04 S St Lawrence, 8107-09 S Ellis, 7237-43 S Bennett, 6749-59 S. Merrill, 638-40 N. Avers, 7201 S Constance, 7600 S. Kingston, 7110 S Cornell, 6217-27 S Dorchester) (.3); related correspondence with property managers (.2).
	Business Operations
7/20/2020 KM	1.40 Revise restoration motion, affidavit, and exhibit and communicate with K. Duff and A. Watychowicz regarding same.
	Business Operations
ED	1.00 Further email correspondence with insurance agent regarding information requested by property insurance inspector (.2); email correspondence with K. Duff (.2) regarding second motion for restoration, and related and document review and revision (.5); email correspondence with accountant regarding same (.1).
	Business Operations
JR	2.20 Exchange correspondence with A. Porter regarding administrative hearings (.1); review orders and notices in preparation for court hearing (.4); appearance in administrative court and obtain dismissals of Department of Sanitation matters (6558 S. Vernon, 4520 S Drexel) (1.7).
	Business Operations
AW	0.50 Communicate with K. Pritchard regarding current draft motion, exhibits, and timing for filing (.2); communicate with K. Duff regarding revised exhibits (.1); communicate with J. Wine regarding notices from administrative court (2804 W 64th, 6354 S California, 5618 S MLK) and update docket (.2).
	Business Operations
MR	1.20 Attention to completing restoration motion.
	Business Operations
7/21/2020 KM	3.30 Revise restoration motion, affidavit, and exhibits, prepare electronic version, and communicate with K. Duff regarding same (.9); review funds requests from property manager for utilities and refuse disposal and communicate with K. Duff regarding same (.3); begin review of certain property expenses for 2020 to date, and communications with K. Duff and property manager regarding same (2.1).

**Business Operations** 

Indiv Hours Description Date 7/21/2020 MR 0.70 Review and follow up on motion regarding restoration. **Business Operations** JR 0.20 Review emails from E. Duff and accountant regarding financial reporting for review. **Business Operations** 0.40 Briefly review revised drafts of restoration motion and declaration (.2); 7/22/2020 KMP communicate with EB team regarding issues relating to filing of consolidated motions (.2). **Business Operations** ED 1.50 Correspondence and telephone calls with insurance agent, property managers regarding requests for property inspection information by property insurance representative (.2); preliminary review of draft April accounting reports (.1); review and comment on draft declaration in support of motion for restoration (.4); review and analysis of property manager reporting with respect to sold property (8100 S Essex) to determine reimbursable amounts (.7) and email correspondence with property manager and accountant regarding same (.1). **Business Operations JRW** 1.40 Email exchanges with city attorneys regarding entry of orders on matters scheduled for July 23 hearing (7300-04 S St Lawrence, 8107-09 S Ellis, 7237-43 S Bennett, 6749-59 S. Merrill, 638-40 N. Avers, 7201 S Constance, 7600 S. Kingston, 7110 S Cornell, 6217-27 S Dorchester and 2909-19 E 78th) and related research and updating of records (1.1); related email to property manager (.1); exchange correspondence with A. Porter and K. Duff regarding continuation orders, property inspections and alternative addresses (.2). **Business Operations** JR 0.60 Work with E. Duff regarding financial reporting and review of same related to April reports (.3); review property information for the declaration related to restoration of funds for the benefit of other properties (.3). **Business Operations** 7/23/2020 JR 4.00 Update property address information to exhibit 2 to second restoration motion (.2): exchange communication with K. Pritchard and K. Duff regarding same (.1); complete review of financial reports received from accounting firm and property management relating to all income and loss statements (3.7). **Business Operations** 

Date	<u>Indiv</u> <u></u>	lours I	Description
7/24/2020	KMP	2.70	Revise consolidated motion for restoration and to approve sales and exhibits, and prepare same and related materials for filing (2.1); electronically file same with court (.3); communications with EB team regarding the foregoing (.3).
			Business Operations
	JRW	0.20	Correspondence to city attorneys regarding housing court matters and related review of electronic case dockets.
			Business Operations
	JR	1.10	Finalize review of financial income and loss reporting for all properties (.6); exchange correspondence with E. Duff regarding financial report review and provide information related to discrepancies discovered in reports (.5).
			Business Operations
7/25/2020	KMP	0.70	Prepare emails for service of consolidated motion to defendant and all known claimants, and communicate with A. Watychowicz regarding same.
			Business Operations
7/26/2020	AW	0.20	Attention to email regarding EquityBuild records .
			Business Operations
7/27/2020	KMP	1.80	Continue review of property manager's reports.
			Business Operations
	JRW	0.60	Email exchange with property manager regarding notice (7508 S Essex) and related email exchange with K. Duff (.4); correspondence to city attorney regarding administrative hearings scheduled this week (4520-26 S Drexel and 7110 S. Cornell) (.1); email exchange with A. Porter regarding status of pending administrative proceedings (.1).
			Business Operations
	AW	1.20	Attention to email from former EquityBuild employee regarding vendor account, research regarding same, draft notice, and communicate with K. Duff regarding details (.5); attention to revised financial report for property (8100 S Essex) and apply requested revisions (.1); communicate with J. Wine regarding active cases in administrative court (.2); research and email communications with M. Rachlis regarding properties (.4).
			Business Operations
7/29/2020	KMP	2.80	Review documentation and prepare forms for funds transfers to financing company for property insurance premium financing, payment for lawn services at Houston property (1102 Bingham), and to property manager

Date	<u>Indiv</u> <u>F</u>	lours	Description
			for utilities at various buildings and installment on payment plan for water bills (7201 S Constance, 7327 S Bennett) (.6); communications with K. Duff and bank representatives regarding same (.2); communication with lawn services provider and property manager to confirm funds transfers (1102 Bingham) (.2); review and analysis of property manager's invoices (1.8).
			Business Operations
7/29/2020	ED	0.80	Review and analysis of financial reporting documents from property managers relating to preparation of April accounting reports.
			Business Operations
	JRW	0.20	Review electronic docket for housing court matters and related email to corporation counsel.
			Business Operations
7/30/2020	KMP	1.70	Review and analysis of property manager's invoices and confer with E. Duff regarding same.
			Business Operations
	JRW	0.40	Exchange correspondence with A. Watychowicz regarding continuation orders received and scheduled hearings (7110 S Cornell and 1422 E. 68th).
			Business Operations
	AW	0.60	Attention to and email counsel notice of delinquency regarding Houston property (1102 Bingham) (.1); attention to notices from administrative court, email J. Wine regarding same, and update docket (.5).
			Business Operations
7/31/2020	ED	0.50	Review of notes from J. Rak regarding draft April reports (.1); further review of reports and related financial reporting (.2); correspondence with accountant with comments and corrections (.2).
			Business Operations
	JRW	1.10	Review continuation orders for administrative hearings (7110 S. Cornell, 1422 E 68th, 7656 S Kingston, 2527 E 76th, 7749 S Yates, 6250 S Mozart, 416 E 66th, 7109 S Calumet, 7546 S Saginaw) (.7); exchange correspondence with property manager regarding cases with upcoming administrative hearings (6250 S Mozart, 8209 S Ellis)(.3); email exchange with A. Porter regarding status of housing court matter (7201 S Constance) (.1).
			Business Operations
	AW	0.30	Further research and detailed email to K. Duff regarding accounts payable email.
			Business Operations

	Date	Indiv	<u>Hours</u>	Description		
SUBTO	TAL:			[	79.80	19041.00]
Case A	dministration					
	7/8/2020	KMP	0.20	Communications with provider of lawn services at Houst Bingham) regarding payment.	on property (	1102
				Case Administration		
	7/9/2020	AW	0.70	Prepare pleadings and request updates to Receivership	website.	
				Case Administration		
	7/30/2020	AW	1.00	Communicate with counsel regarding transcript from hearing (.1); prepare pleadings for update to website and contact IT consultant with request for update (.8); update docket (.1).		
				Case Administration		
SUBTO	TAL:			[	1.90	266.00]
Claims .	Administration	on & O	bjectior	<u>ns</u>		
	7/1/2020	JRW	0.70	Communicate with A. Watychowicz and J. Rak regarding (4533-37 S Calumet) and updating master claims sheet regarding claimant (.2); communicate with A. Watychow regarding claims against property (7109 S. Calumet) and	(.2); researchicz and K. Du	n Iff
				Claims Administration & Objections		
		AW	1.20	Email M. Rachlis and K. Duff regarding claims against property (7109 S Calumet) (.2); apply revisions to master property list and master claims list (1.0).		
				Claims Administration & Objections		
		MR	3.70	Review claims files (1.7); participate in call with lenders' Nicholson) regarding properties (7110 Cornell and 6751 participate in call with K. Duff regarding upcoming issues conference with claimants' counsel and K. Duff (.5).	Merrill) (.5);	ell) (1.0);
				Claims Administration & Objections		
		JR	2.40	Review March property financial documents.		
				Claims Administration & Objections		
	7/2/2020	JRW	0.50	Compare lists of properties with institutional debt and rel with E. Duff regarding discrepancies (.4); revise claims of property (1414 & 1418 East 62nd Place) (.1).		
				Claims Administration & Objections		

<u>Date</u>	<u>Indiv</u> <u>I</u>	Hours	Description
7/2/2020	AW	0.70	Attention to emails from claimants, email exchanges with K. Duff and J. Wine regarding responses, and provide same to claimants (.5); attention to objections filed by institutional lenders to motion for approval of sale and communicate with counsel regarding same (.2).
			Claims Administration & Objections
7/4/2020	JRW	0.60	Review claims against property (7201 S Dorchester) and related analysis to A. Porter.
			Claims Administration & Objections
7/6/2020	KMP	0.40	Review various documents and materials relating to asset holder, and communications with K. Duff, A. Porter, and A. Watychowicz regarding same.
			Claims Administration & Objections
	AW	1.20	Attention to emails from claimants, email exchanges with K. Duff and J. Wine regarding responses, and provide same to claimants (.6); attention to claimant's submission and communicate with J. Wine regarding same (.2); work in database in multiple claims (.4).
			Claims Administration & Objections
7/7/2020	ED	0.60	Continue preparation of correspondence to transmit March accounting reports to lenders' counsel (.4); call with accountant regarding revisions to reports and presentation of information regarding remaining reimbursable amounts by property (.2).
			Claims Administration & Objections
	AW	0.40	Attention to follow up emails from claimant, email exchanges with K. Duff and J. Wine regarding responses, and provide same to claimant.
			Claims Administration & Objections
7/8/2020	JRW	0.30	Attention to claimant inquiries.
			Claims Administration & Objections
	AW	0.60	Attention to correspondence from claimants and communicate with K. Duff regarding draft responses (.4); email responses to claimants' inquiries (.2).
			Claims Administration & Objections

Date	<u>Indiv</u> <u>H</u>	Hours	Description
7/9/2020	ED	4.10	Review chart from accountant relating to reimbursable amounts from proceeds of sold properties (.3) and call (.1) and email correspondence (.2) regarding same; review and revise draft of affidavit (1.2); transmit March accounting reports to institutional lenders' counsel (1.7); organize and send materials for preparation of April accounting reports to accountant (.6).
			Claims Administration & Objections
	JRW	0.20	Attention to responses to claimant inquiries.
			Claims Administration & Objections
	AW	0.40	Attention to emails and voice messages from claimants and work with K. Duff and J. Wine on responses to same.
			Claims Administration & Objections
7/13/2020	MR	3.30	Further preparation for (1.0) and participate in meeting regarding property issues (7110 Cornell and 6751 Merrill) (.8); preparation for upcoming hearing (1.5).
			Claims Administration & Objections
7/14/2020	JRW	3.70	Study briefing on claims process motion in preparation for hearing (.5); prepare notes regarding same and related email to M. Rachlis and K. Duff (.3); study alternative claims process proposed by institutional lenders (.4); telephone conference with K. Duff regarding document vendor (.2); review master services agreement and prior correspondence regarding same (.3); telephone conference with vendor regarding proposal for document processing and hosting (.4); conference with K. Duff and M. Rachlis regarding mortgagee's alternative procedures and preparation for hearing on claims process motion (1.6).
			Claims Administration & Objections
	AW	0.20	Work on and respond to email from claimant.
			Claims Administration & Objections
	MR	2.10	Participate in call regarding alternative procedures filed by lenders with K. Duff and J. Wine (1.6); continued preparation for hearing (.5).
			Claims Administration & Objections
7/15/2020	JRW	5.50	Work with M. Rachlis and K. Duff to prepare for claims process motion and related discussion with A. Watychowicz regarding EquityBuild documents (2.0); confer with claims vendor regarding total volume of claims documents (.1); confer with document repository vendor regarding logistics for file transfer and acknowledgement of confidentiality obligations (.3); analyze properties and related email to K. Duff and M. Rachlis (.4); review and comment on notes for oral argument (.2); compare filed demonstrative

Date	Indiv	Hours	Description

exhibit with draft alternative processes from institutional lenders (.1); review Judge Lee conference instructions (.2); attend hearing on claims process motion (1.4); conference with K. Duff and M. Rachlis regarding Judge Lee's rulings, composition and volume of EquityBuild documents, and process for same (.8).

Claims Administration & Objections

7/15/2020 AW

2.50 Communicate with K. Duff and J. Wine regarding inquiries from claimants (.4); respond to emails from claimants (.1); communicate with K. Duff regarding prior correspondence with investors (.1); communicate with J. Wine regarding claims submission and size of same (.1); start work on detailed inventory of all documents preserved during first months of receivership, phone call, and email follow up with J. Wine regarding same (1.8).

Claims Administration & Objections

MR 4.70 Further preparation for hearing (.5) and conferences with K. Duff and J. Wine regarding same (2.0); attend hearing (1.4); conferences with K. Duff and J. Wine regarding various issues resulting from hearing (.8).

Claims Administration & Objections

7/16/2020 JRW

0.70 Confer with A. Watychowicz regarding inventory of documents and efforts to collect same (.4); exchange correspondence regarding claimant inquiries (.3).

Claims Administration & Objections

AW 3.10 Conference call with J. Wine regarding claims motion hearing and preparation to meet deadline regarding EquityBuild, Inc's documents (.5); email exchange with the Receivership team regarding inventory and current status of documents (.2); communicate with K. Duff and J. Wine regarding inquiries from claimants and investment details (.3); start work on detailed inventory of documents in online portal (2.1).

Claims Administration & Objections

7/17/2020 JRW

1.60 Conference call with K. Duff and M. Rachlis regarding plan for producing EquityBuild documents to claimants (1.2); related exchange of correspondence with K. Duff and M. Rachlis, counsel for institutional lender and document vendor (.4).

Claims Administration & Objections

MR 1.20 Attention to various issues on claims process matters associated with documents and conferences regarding same with A. Watychowicz, J. Wine and K. Duff.

Claims Administration & Objections

AW 0.80 Complete work on detailed inventory of documents in e-sign online portal, review data collected by IT consultant, and email counsel regarding same.

Claims Administration & Objections

<u>Date</u> <u>Indiv Hours Description</u>

7/20/2020 JRW

3.50 Exchange correspondence with eDiscovery vendor regarding proposal (.2); attention to responding to claimant inquiries (.4); study tax returns from accountant for relevance to claims and related analysis to K. Duff (1.2); further investigation of EquityBuild documents and related review of notes from forensic IT consultant (1.7).

Claims Administration & Objections

2.10 Attention to email communications from claimants (.4); respond to email from claimant (.2); conference with IT consultant regarding EquityBuild, Inc.'s documents and finalize inventory (.7); communicate with J. Wine regarding available bank statements and start supplementing available records (.8).

Claims Administration & Objections

7/22/2020 JRW

AW

3.70 Exchange correspondence with K. Duff regarding claims against properties (5450-52 S Indiana, 7749-59 S Yates) (.2); conference call with claimant counsel, K. Duff and M. Rachlis regarding EB documents (.8); research and update document inventory and confer with M. Rachlis in preparation for same (1.5); conference with K. Duff and M. Rachlis regarding document collection, information regarding EquityBuild employees, priority status of secured lender claims and motion practice (.8); follow up with A. Watychowicz and K. Pritchard regarding categories of documents (.1); attention to responses to claimant inquiries (.2); review memorandum from counsel for institutional lender regarding preliminary list of requested documents (.1).

Claims Administration & Objections

MR

3.90 Prepare for (1.2) and participate in call with claimant's counsel regarding EB documents and data base issues (.8); discussions regarding same with K. Duff and J. Wine (.8); attention to claims files regarding lender issues (.3); conferences with K. Duff (.8) regarding same (7749 Yates, 5450 Indiana).

Claims Administration & Objections

7/23/2020 JRW

0.60 Review lists of EquityBuild employees to compile information to counsel for claimant (.3); review claimant inquiries and responses (.3).

Claims Administration & Objections

7/24/2020 JRW

1.50 Exchange correspondence with K. Duff regarding claims submitted on behalf of claimants and correspondence from claimant's counsel (.4); related review of claim forms, amendments submitted through portal and supporting materials (.8); email exchange with claims vendor regarding amended claims (.3).

Claims Administration & Objections

7/27/2020 JRW

0.90 Exchange correspondence with claims vendor regarding procedure for amending claims (.2); telephone conference with A. Watychowicz regarding amendments to claims in portal (.3); related communications with K. Duff regarding response to claimant's counsel (.2); review and revise response to claimant inquiries (.2).

Claims Administration & Objections

AW 0.70 Review claim submission, revision to master claim sheet, and respond to email from claimant regarding same (.2); attention to voicemail from claimant and respond to same (.1); attention to emails from claimant and communicate with counsel regarding same (.4).

Claims Administration & Objections

7/28/2020 JRW

0.40 Confer with A. Watychowicz regarding claimant inquiries (.2); related response to claimant (.2).

Claims Administration & Objections

AW 0.80 Review claim submission, revision to master claim sheet, and respond to email from claimant regarding same (.2); review and revisions to lengthy response to claimant inquiry (.3); communicate with J. Wine regarding inception of template for master claims spreadsheet (.1); finalize notice of receivership to vendor (.1); communicate with K. Duff regarding recently filed mortgagees' motion to intervene (.1).

Claims Administration & Objections

7/29/2020 JRW

4.90 Telephone conference with potential e-discovery vendor (.5); prepare spreadsheet of EquityBuild documents for lender's counsel (1.5); telephone conference with A. Watychowicz regarding bank records (.2); telephone conference with K. Duff and M. Rachlis regarding inventory of EquityBuild documents (.4); research status of code violations and related exchange of correspondence with counsel for claimant (.5); telephone conference with claimant's counsel regarding EquityBuild documents and database (.7); review documents from EquityBuild counsel (.8); emails to counsel for claimant regarding EquityBuild documents and potential e-discovery vendor (.3).

Claims Administration & Objections

AW 0.50 Continue work on inventory of EquityBuild documents and communicate with J. Wine regarding same (.3); communicate with IT consultant regarding online storage inventory (.1); communicate with K. Duff regarding lenders' motion to intervene (.1).

Date	Indiv	<u>Hours</u>	Description
7/29/2020	MR	1.80	Conferences regarding production issues with K. Duff (.3) and J. Wine (.4) review materials regarding same (.4); participate in call with claimant's counsel (.7).
			Claims Administration & Objections
7/30/2020	JRW	0.90	Legal research regarding lender's motion to intervene (.5); attention to responding to claimant inquiries (.3); email exchange with claimant's counsel and potential vendor regarding meeting (.1).
			Claims Administration & Objections
	AW	0.60	Work with K. Duff and J. Wine on responses to claimants' emails (.4); attention to email from claimant regarding legal representation and consult with K. Duff and J. Wine regarding same (.2).
			Claims Administration & Objections
7/31/2020	JRW	2.00	Attention to responding to claimant inquiries (1.1); additional legal research and draft memo regarding motion to intervene (.8); exchange correspondence with K. Duff regarding claims against property (1131-41 E 79th St.) (.1).
			Claims Administration & Objections
	AW	1.00	Attention to emails from claimants and work with K. Duff and J. Wine on responses (.7); review claim submission and previous correspondence from claimant, and respond to email from claimant regarding same (.3).
			Claims Administration & Objections
TOTAL:			[77.20 21022.00]
us Reports			
7/17/2020	JR	0.30	Review email from J. Wine and provide an update on requested status of properties, send an updated closed property spreadsheet.
			Status Reports
7/21/2020	JRW	2.50	Drafting of second quarter 2020 status report.
			Status Reports
7/22/2020	KMP	2.60	Prepare financial exhibits for second quarter 2020 status report (2.4); review financial documentation and communicate with J. Rak regarding certain second quarter tax payments (.2).
			Status Reports

Date	Indiv	<u>Hours</u>	Description
7/22/2020	JR	0.30	Review email from J. Wine regarding 2nd quarter status reports and further exchange communication regarding same (.1); exchange correspondence with K. Duff and K. Pritchard regarding same (.2).
			Status Reports
7/23/2020	JRW	1.40	Attention to preparing 2Q2020 status report (1.0); related preparation of chart regarding motions and orders confirming sales of properties and communications with J. Rak regarding same (.4).
			Status Reports
7/24/2020	JRW	1.20	Continue working on 2Q2020 status report.
			Status Reports
7/26/2020	JR	0.50	Update requested closed property information required for status report.
			Status Reports
7/27/2020	KMP	3.30	Continue preparation of financial exhibits for 2Q2020 status report and communications with J. Wine regarding exhibits and insurance issues relating to status report.
			Status Reports
	JRW	5.40	Continued review and revision of 2Q2020 status report and related communications and comments from M. Rachlis and K. Duff (5.1); communications with J. Rak and A. Porter regarding marketing of single family portfolio, property numbers, and real estate tax issue (431 E 42nd Place) (.3).
			Status Reports
	AEP	0.20	Prepare status report on progress of assembly of due diligence material and public listing and marketing of single-family home portfolio at request of J. Wine and in connection with preparation of second quarter 2020 status report.
			Status Reports
	MR	1.40	Revise status report.
			Status Reports
	JR	2.00	Provide J. Wine with information for status report relating to various properties (1.5); further research and correspondence with J. Wine related to property information requested for 2nd quarter status report (.5).
			Status Reports
7/28/2020	KMP	3.20	Revise 2Q2020 status report and exhibits and communications with J. Wine regarding various issues relating to same (2.8); compile electronic copies of report and exhibits for review prior to filing (.4).
			Status Reports

<u>Date</u>	<u>Indiv</u> <u>I</u>	Hours	Description
7/28/2020	JRW	3.60	Exchange correspondence with K. Duff and A. Porter regarding properties in estate and sold properties (.4); work with K. Pritchard regarding accounting and exhibits for 2Q2020 status report (.3); additional revisions to status report (2.4); work with K. Pritchard and A. Watychowicz on exhibits to same (.4); related telephone conference with A. Porter regarding property numbers (.1).
			Status Reports
	AEP	0.60	Read correspondence from J. Wine regarding computation of number of properties in portfolio and number of properties sold each quarter, review portfolio spreadsheet, and prepare e-mail providing clarification (.3); teleconference with J. Wine regarding proposed modification to property numbering system (.1); prepare verbiage for insertion into status report regarding status of sales of certain receivership properties (.2).
			Status Reports
	AW	0.30	Generate and revise updated master claims list for status report.
			Status Reports
	JR	0.60	Exchange correspondence with J. Wine regarding 2nd quarter status report.
			Status Reports
7/30/2020	KMP	0.60	Revise second quarter status report and exhibits, prepare for filing, and file electronically (.5); serve as-filed status report on defendant (.1).
			Status Reports
	JRW	1.00	Finalize 2Q2020 status report and exhibits.
			Status Reports
	AW	0.80	Revisions to master claims spreadsheet for status report (.4); attention to filed status report, prepare service list, and serve as per service list (.4).
			Status Reports
SUBTOTAL:			[31.80 6814.00]
Tax Issues		_	
7/1/2020	KMP	0.40	Prepare list of returns and communicate with accountant to confirm receipt of same and verify identity of remaining entities for which returns are still in preparation.
			Tax Issues
7/8/2020	KMP	0.10	Communicate with tax administrator regarding request for account statements.
			Tax Issues

Date	Indiv	<u>Hours</u>	Description
7/9/2020	KMP	0.60	Compile electronic bank statements for Receiver's accounts and forward to tax administrator pursuant to their request.
			Tax Issues
7/10/2020	AW	0.70	Research former EquityBuild employee email regarding financial statements relating to former property (4755 S St Lawrence) and email K. Duff regarding results.
			Tax Issues
7/17/2020	AW	0.60	Email exchanges with K. Duff regarding tax issues raised by investors.
			Tax Issues
7/21/2020	KMP	0.80	Forward tax notices to accountant for review and advice (.2); review draft 2017 tax returns received from EB accountant and prepare correspondence to K. Duff regarding same (.6).
			Tax Issues
7/29/2020	KMP	0.50	Telephone conference with accountant regarding tax administrator's request for forms 1099-S and other documents in connection with preparation of 2019 tax returns (.2); compile property account statements and forward to tax administrator for review in connection with same (.3).
			Tax Issues
7/30/2020	KMP	0.40	Communications with A. Porter and tax administrator's regarding request for forms 1099-S and other documents in connection with preparation of 2019 tax returns (.2); communication with accountant regarding receipt of tax notice from state agency (.2).
			Tax Issues
TAL:			[ 4.10 574.00]

366.20 \$91,520.00

Other Charges			
	Description	_	
Business Operations			
	Photocopies for July 2020		174.80
	Postage for July 2020		20.50
	Process Server for service of subpoenas		396.00
	Online research for July 2020		645.49
	Software monthly license fees for July 2020 (Google, \$96; InSynq, \$266.50)		362.50
SUBTOTAL:		[	1,599.29]
Litigation Consulting			
	Consulting fee		5,000.00
SUBTOTAL:		[	5,000.00]
Total Other Charges		_	\$6,599.29

Summary of Activity

	Hours	Rate	
Jodi Wine	62.10	260.00	\$16,146.00
Ania Watychowicz	34.90	140.00	\$4,886.00
Justyna Řak	93.30	140.00	\$13,062.00
Kathleen M. Pritchard	44.70	140.00	\$6,258.00
Andrew E. Porter	74.00	390.00	\$28,860.00
Ellen Duff	19.70	390.00	\$7,683.00
Michael Rachlis	37.50	390.00	\$14,625.00

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## **SUMMARY**

TOTAL DUE	\$98,119.29
Other Charges	\$6,599.29
Legal Services	\$91,520.00

# Case: 1:18-cv-05587 Document #: 885-1 Filed: 11/30/20 Page 94 of 190 PageID #:19354 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

November 20, 2020

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen

No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No.6622125

Legal Fees for the period August 2020

\$66,846.00

**Expenses Disbursed** 

\$1,529.11

Due this Invoice \$68,375.11

<u>Date</u>	<u>inaiv H</u>	ours Description
Accounting/Auditin	<u>g</u>	_
8/5/2020	KMP	0.50 Communicate with E. Duff regarding accounting reports for Receivership Estate accounts (.2); communicate with property manager requesting detailed reports regarding certain monthly accounting categories requested by institutional lender, and confer with K. Duff regarding same (.3).
		Accounting/Auditing
8/7/2020	KMP	0.20 Update account ledgers to reflect recent transactions.
		Accounting/Auditing
8/21/2020	) KMP	0.50 Review communication from accountant regarding May schedule of receipts and disbursements (.1); review backup documentation and revise schedule (.4).
		Accounting/Auditing
8/27/2020	) KMP	0.30 Review online account information and conform ledgers for Receivership accounts.
		Accounting/Auditing
SUBTOTAL:		[ 1.50 210.00]
Asset Disposition		
8/3/2020	JR	6.60 Exchange correspondence with real estate broker regarding obtaining plumbing permit for property (7201 S. Dorchester) and research same at City of Chicago website (.2); review leases for property (7110 S. Cornell) in preparation for sale, review all discrepancies (.7); exchange communication with the property manager regarding same and request missing leases and updated leases related to discrepancies (7110 S. Cornell) (.2); update certified rent roll regarding same (7110 S. Cornell) (.3); review post-closing buyer information related to future contact information for tax, water bills and management company and request confirmation from buyers counsel regarding same (.3); review email from K. Pritchard to provide property tax information for property (638 S. Avers) (.2); review email from buyer's counsel regarding property (7110 S. Cornell) requested information (.1); further communication with the title company regarding same (.1); draft closing documents regarding property (7110 S. Cornell) in preparation for

sale (4.5).

8/3/2020 AEP

1.90 Prepare e-mail to counsel for all prospective purchasers of property subsumed within ninth motion to confirm sales regarding deadline for objections, timing issues, and status of title commitments and surveys (.4); send separate e-mails to counsel for all prospective purchasers of property subsumed within ninth motion to confirm sales attaching most recent versions of title commitments and surveys (.2); review consolidated title commitment for single-family homes portfolio, research status of administrative judgments identified as exceptions, prepare list of outstanding issues, and transmit same to title company underwriter regarding continued clearance of title exceptions (1.3).

**Asset Disposition** 

8/4/2020 JR

4.60 Review email from the title company regarding updated title commitment and save in property folder (7110 S. Cornell) (.1); review and organize due diligence documents for new tranche of properties (4317 Michigan and 7255 Euclid) for which final bids are due (2.1); exchange communication with property management team regarding missing requested due diligence documents (4317 Michigan and 7255 Euclid) (.1); follow up communication with the property manager regarding requested due diligence materials regarding new tranche of properties for which bids are due (.1); review lien waivers for property manager and broker and forward to A. Porter for final review prior to sending for signatures for closing (7110 S. Cornell) (.2) review email from leasing manager regarding expired leases and status of month to month tenants, review and update rent roll regarding properties (4317 Michigan and 7255 Euclid) (.3); exchange communication with the title company and forward updated title commitment regarding water application for processing related to property (7110 S. Cornell) (.1); review email from property manager regarding a request for commercial space lease (6250 Mozart) (.1); research files regarding same (6250 S. Mozart) (.2); exchange communication with the property management team requesting same (.1): update all closing documents with the nominee name for buyer (7110 S. Cornell) (.7); update property tax balances and update closing checklist relating to status of all documents required for closing and for A. Porter review, modifications and approval (7110 S. Cornell) (.3); telephone call to the City of Chicago Building Department regarding pulling plumbing permit for property (7201 S. Dorchester) (.1); further email correspondence regarding same (.1)...cont'd

Asset Disposition

JR 2.10 cont'd...review email from the title company regarding water application ready status and update documents regarding same for property (6250 S. Mozart) (.1); review requested commission statement received from real estate broker for upcoming closings and update our property files (.5); review email and rent roll from property manager regarding requested leases for closing (7110 S. Cornell)(.4); exchange further correspondence with the leasing manager and property manager regarding an original lease and an amendment to lease for a cell phone tower for property (6250 S. Mozart) (.3); draft partial closing documents in preparation for closing (7201 S. Dorchester) (.8).

8/5/2020 JR

5.70 Review email from property manager regarding previous request for correct leases for property (7110 S. Cornell) (.1); review leases, security deposits, lease terms, lessor name and update to property folder regarding same (7110 S. Cornell) (1.3) update certified rent roll in preparation for closing of same (.3); review email from leasing manager and exchange communication regarding lease options for single family home (1401 W. 109th) and other property status related to leasing (.2); review leases, security deposits, lease term dates and lessor and lessee information related to certified rent roll in preparation for closing (7201 S. Dorchester) (.5); exchange correspondence with the management team regarding requests for missing information and/or resolution of discrepancies related to same (7201 S. Dorchester) (.2); prepare all leases for production to buyer at closing (7110 S. Cornell) (.3); review email from property manager regarding subsidy agreement for tenant, save in property folder and update certified rent roll (7110 S. Cornell) (.1); review email from potential buyer regarding financial records for properties in default (7600 S. Kingston, 7656 S. Kingston and 6949 S. Merrill) (.1): exchange correspondence with K. Pritchard requesting wire instructions and account information for various properties in preparation for sale (.2); draft closing documents for property (7201 S. Dorchester) (2.3); update closing checklist regarding same (7201 S. Dorchester) (.1).

Asset Disposition

AEP 2.00 Tele

2.00 Teleconference with title company underwriter regarding all encroachments reflected on surveys of single-family homes and deletion of certain special exceptions on single-family homes title commitment.

Asset Disposition

8/6/2020 MR

2.20 Review of real estate sales pricing (.5); follow up regarding same with brokers and others (1.7).

**Asset Disposition** 

**AEP** 

1.50 Teleconference with K. Duff, M. Rachlis, and receivership brokers to review and analyze bids received in connection with current marketing tranche.

Asset Disposition

8/7/2020 MR

0.70 Attention to sales issues and conferences regarding same.

**Asset Disposition** 

AEP

0.70 Teleconference with K. Duff, M. Rachlis, and receivership brokers to review and analyze offers received from prospective bidders.

**Asset Disposition** 

8/10/2020 JR

5.80 Review emails from property management related to commercial lease for property (6250 Mozart) (.2); exchange correspondence with property management requesting same (6250 S. Mozart) (.1); review email from

property manager regarding subsidy applications and property tax balances for property (4750 S. Indiana) (.1); exchange communication with the property management team regarding requested reports for closing (7201 S. Dorchester) (.1); follow up communication with A. Porter regarding lien waivers to property manager and real estate broker related to execution for closing (7110 S. Cornell) (.1); review current delinquency report and ledgers related to closing of property (7110 S. Cornell) (.2); update certified rent roll regarding same (7110 S. Cornell) (.9); draft closing documents for property (1131-41 E. 79th) (4.1).

Asset Disposition

8/10/2020 MR

1.10 Participate in call regarding offers with asset manager, A. Porter, and K. Duff and review summary regarding same.

Asset Disposition

**AEP** 1.10 Teleconference with K. Duff, M. Rachlis, and receivership brokers to review offers.

Asset Disposition

8/11/2020 JRW

JR

0.30 Exchange correspondence with A. Porter regarding pending housing court and buildings department matters regarding property scheduled for closing (7110 S Cornell) and related research regarding same.

Asset Disposition

6.90 Review email from the title company regarding requested water certificate for

property (1131-41 E. 79th) and update closing checklist (.1); review property tax receipt (4750 S. Indiana) (.1); review payment ledger for property in preparation for closing (7110 S. Cornell) (.3); update certified rent roll regarding same (7110 S. Cornell) (.6); exchange correspondence with property management regarding same (.1); update and finalize notices to tenants regarding same (.5); exchange communication with property management regarding execution of same for property (7110 S. Cornell) (.1); review email from A. Porter related to lien waivers for same (7110 Cornell) (.1); exchange communication with the real estate broker requesting executed lien waiver for same and request for status of property key coordination (7110 S. Cornell) (.1); review email from J. Wine relating to status of closing regarding property (7501 S. Essex) (.1); further research status and reply to J. Wine regarding same (7501 Essex) (.2); review email from A. Porter regarding status of new applicants for the single family homes (.1); further communication with property management regarding same (.1); review email from J. Wine regarding confirmation of closing for property (8209 S. Ellis) related to building violations and provide settlement statement from closing as evidence of closing (.1); draft closing documents for property in preparation of sale (1131-41 E. 79th) (1.8); review requested due diligence documents previously requested from property management for last tranche expected to finalize bidding process (1.2); organize all due diligence documents for each property (1.3).

8/11/2020 MR

1.10 Attention to property (4520 Drexel) sale issues (.3); participate in telephone conference with brokers and K. Duff following up on offers for properties (.8).

**Asset Disposition** 

AEP 6.00

6.00 Teleconference with purchaser of receivership property (7051 S Bennett) regarding title issues, missing leases, and timing of closing (.3); read correspondence from counsel for purchaser of receivership properties (2736 W 64th, 6355 S Talman, 6356 S California, and 5618 S King) regarding objections to title commitments, and prepare response thereto explaining all anticipated deletions and attaching copies of relevant pleadings and orders relating to pending actions subject to which title will be conveyed (.7); review draft broker and property manager lien waivers in connection with closing of sale of receivership property (7110 S Cornell) (.2); read correspondence from prospective purchaser of receivership properties (6558 S Vernon, 7201 S Constance) regarding objections to special exceptions on title, review and analyze corresponding title commitments and associated administrative and housing court proceedings, and prepare response thereto (.5); read inquiry from counsel for purchaser of receivership property (7953 S Marquette), investigate ownership of parcel adjacent to the north, and respond regarding inclusion of said property in receivership sale (.4); review status of administrative and housing court proceedings affecting receivership property (7110 S Cornell), title exceptions, and other documents and update closing checklist (.3); read notice associated with receivership property (7024 S Paxton), update closing checklist, respond to J. Wine, and prepare e-mail to management company forwarding notice and requesting assistance (.2); communications with counsel for purchaser of receivership property (7051 S Bennett) regarding dispute (.2); (cont'd in next entry)

**Asset Disposition** 

**AEP** 

(Cont'd from previous entry) Review all closing checklists for properties subsumed within ninth motion to approve and prepare outline of critical path items still needed to consummate closing and prepare e-mail to title company requesting revisions and updates, as necessary for all properties with title commitments requiring modification (1.5); review latest continuance orders received from corporation counsel in selected circuit court and department of administrative hearings cases, update files, and distribute to counsel for purchasers of receivership properties (7750 S Muskegon, 4520 S Drexel, and 7710 S Cornell) (.4); communications with counsel for purchaser of receivership property (7110 S Cornell) regarding updated title commitment reflecting new nominee (.1); review files and prepare e-mail to surveyor providing identity of grantees and lenders in connection with request for updated surveys in connection with receivership properties (1131 E 79th, 6250 S Mozart, and 3074 E Cheltenham) (.2); prepare e-mail to counsel for purchaser of receivership properties (6558 S Vernon and 7201 S Constance) requesting grantee, lender, and loan amount information in connection with revisions to surveys and title commitments (.1); research all municipal judgment title exceptions identified on properties subsumed within ninth motion to confirm and prepare e-mails to corporation counsel regarding status of payment (.4); prepare e-mail to corporation counsel regarding title

company request for certificate of release of mandatory injunction in connection with receivership property (7953 S Marquette) (.3); prepare e-mail to J. Rak regarding need for proof of payment of special service area tax on receivership property (6250 S Mozart) in connection with deletion of corresponding special exception (.2).

Asset Disposition

8/12/2020 JR

5.90 Review email from A. Porter regarding special exceptions on title related to property (6250 S. Mozart) and related to special service area within the property (.1); communication with A. Porter regarding same (6250 S. Mozart) (.1); research special service area information and taxes and convey all related information to A. Porter (6250 S. Mozart) (.8); review email from leasing manager regarding requested leases for property (7201 S. Dorchester) (.1); further communication with the leasing manager regarding missing items regarding same (7201 S. Dorchester) (.1); review all closing documents in preparation for closing (7110 S. Cornell) (.4); finalize notices to tenants regarding same (7110 S. Cornell) (.7); draft certified rent roll for property (1131 E. 79th) (.8); review leases, lease terms and security deposits regarding same (1131 E. 79th) (.5); update draft rent roll regarding same (1131 E. 79th) (.2); review and update electronic files with due diligence documents related to the last tranche of properties from property managers (1.1).

**Asset Disposition** 

MR 0.50 Telephone conference regarding marketing and sale of single family

residence portfolio with asset manager, K. Duff and A. Porter.

Asset Disposition

AEP

3.20 Review all draft closing documents, rent roll, and water invoices, and prepare closing figures in preparation for closing of sale of receivership property (7110 S Cornell) and transmit same to title company and buyer's counsel (.7); teleconference with receivership broker regarding outcome of bidding between prospective purchasers of receivership property (4611 S Drexel) and preparation of estimated closing costs for all properties in latest marketing tranche (.2); prepare estimated closing costs for all properties in latest marketing tranche (1.8); teleconference with receivership brokers regarding initiation of marketing of single-family home portfolio, bidding procedures, pricing, and publication notice (.5).

**Asset Disposition** 

8/13/2020 JR

3.90 Exchange correspondence with property management requesting updates for closing (7110 S. Cornell) (.1); exchange communication with K. Duff regarding form 1099 from various closings and update electronic files regarding same (5450 S. Indiana, 11117 Longwood, 8214 Ingleside, 8107 S. Ellis, 8000 S. Justine, 8326-52 S. Ellis, 4520 S. Drexel, 8201 S. Kingston, 7546 S. Saginaw, 7749 S. Yates, 7760 S. Coles) (.3); work with A. Porter and K. Duff regarding execution of closing documents for closing (7110 S. Cornell) (1.5); attend closing (7110 S. Cornell) (1.5); exchange correspondence with K. Duff, K. Pritchard, broker and property management regarding status of closing (7110 S. Cornell) (.1); forward final closing documents to buyer (7110 S. Cornell) (.1); exchange correspondence with property management requesting documents for

for closing (1131-41 E. 79th) (.1); draft requested addendum to contract for property (638 Avers) (.2).

**Asset Disposition** 

8/13/2020 AEP

4.40 Meeting with K. Duff and J. Rak to finalize rent roll, water prorations, and other closing credits and oversee execution and inventory of closing documents (1.5); attending closing of receivership property (7110 S Cornell) (1.5); review rent restoration spreadsheets and finalize closing cost estimate spreadsheets for distribution to lenders associated with final marketing tranche (1.4).

Asset Disposition

8/14/2020 JR

1.30 Exchange correspondence with broker regarding plumbing permit status for property (7201 S. Dorchester) (.1); follow up correspondence with property manager inquiring about the same (7201 S. Dorchester) (.1); further communication with property management requesting updates to due diligence documents for single family homes (.2); review email from J. Wine regarding closed property (8209 S. Ellis) and provide requested information (.1); review entity folders and update electronic files regarding same (.8).

**Asset Disposition** 

MR 0.40 Attention to issues on property sales and potential credit bids (.2); attention to filing by intervenor (.2).

**Asset Disposition** 

**AEP** 

1.50 Correspondence with buyers' counsel and title company regarding postponement of closings of receivership properties (3074 E Cheltenham, 1131 E 79th, and 6250 S Mozart) due to lack of ruling on ninth motion to confirm sales (.1); cursory review of sur-reply filed by defaulted purchaser of receivership properties (6949 S Merrill, 7600 S Kingston, and 7656 S Kingston) and communicate regarding merits of same with K. Duff (.2); review purchase and sale agreement submitted in connection with prospective purchase of receivership property and forward same to K. Duff for counter-signature (.1); review final signed surveys for receivership properties (3074 E Cheltenham, 1131 E 79th, and 6250 S Mozart) and forward same to buyers' counsel and title insurer (.2); read orders entered in connection with pending administrative actions involving receivership property under contract (6949 S Merrill) and forward same to counsel for prospective purchaser with explanations of status (.2); communications with title insurer and corporation counsel regarding request for deletion of special exception to title commitment on receivership property (6558 S Vernon) relating to administrative order demanding compliance with outstanding code violations (.3); send fully-executed contract relating to prospective sale of receivership property (4533 S Calumet) to title company with request for updated title invoice and send copy of same to buyer's counsel with wire instructions relating to earnest money deposit (.2); teleconference with counsel for purchaser of receivership property (4533 S Calumet) regarding due diligence inspection and timing of earnest money deposit (.2).

8/17/2020 JR

0.30 Review email from property manager regarding updated income statements for single family homes and respond regarding same (.1); review email from K. Duff regarding valuation of EquityBuild properties and respond regarding same (.1); review email from E. Duff regarding May financial reporting and update electronic folder (.1).

**Asset Disposition** 

AEP 0.20 Continued correspondence with corporation counsel and title insurer regarding requested deletion of special exception relating to administrative action associated with receivership property (6558 S Vernon).

Asset Disposition

8/18/2020 JR

1.10 Review emails from property management regarding requested documents for property (1131 E. 79th) (.1); update certified rent roll regarding same (1131 E. 79th) (.2); review email from property management relating to the purchase of property (6250 Mozart) and missing commercial lease (.1); follow up communication with property management requesting same (6250 Mozart) (.1); further communication with the property management regarding requests for missing subsidy agreements relating to same (6250 Mozart) (.2); review email from real estate broker regarding SJO Agreements for various properties and update electronic files (.1); follow up correspondence with property management regarding a request for a plumbing permit related to property (6250 S. Mozart) (.1); follow up communication with real estate broker regarding same (6250 S. Mozart) (.1); review escrow agreements and purchase and sale agreements for the new tranche (.1).

**Asset Disposition** 

**AEP** 

2.90 Review marked-up title commitment received from counsel for prospective purchaser of receivership property (7508 S Essex) and respond regarding special exceptions to be deleted from pro forma title policy delivered at closing (.2); follow-up conference call with counsel for prospective purchaser of receivership property (4533 S Calumet) regarding timing of due diligence inspection, deposit of earnest money, and rent prorations (.2); review revised title commitment associated with receivership property (6558 S Vernon) and transmit same to buyer's counsel (.1); review and revise contracts submitted by winning bidders in connection with receivership properties (4317 S Michigan, 7442 S Calumet, 7701 S Essex, 7024 S Paxton, 431 E 42nd, 4750 S Indiana, and 816 E Marquette), prepare incoming wire instructions for each, transmit same to K. Duff for counter-signature, and update closing checklists to reflect current status of each contract (2.1); correspondence with prospective purchaser of receivership property (4317 S Michigan) regarding brokerage commission (.2); read latest orders entered in connection with administrative hearings involving former receivership property (8209 S Ellis) and transmit same to purchaser (.1).

8/19/2020 AEP

1.30 Review contracts countersigned by K. Duff in connection with prospective sales of receivership properties (431 E 42nd, 816 E Marquette, 4317 S Michigan, 4533 S Calumet, 4750 S Indiana, 7024 S Paxton, 7442 S Calumet, and 7701 S Essex), update checklists, make revisions as needed, and disseminate same to relevant buyers' counsel with earnest money deposit instructions.

**Asset Disposition** 

8/20/2020 JR

0.80 Exchange correspondence with K. Pritchard regarding sub-account numbers for various properties in anticipation of future closings (.1); exchange communication with A. Porter regarding new prospective leases or renewals for remainder of EquityBuild properties (.1); exchange correspondence with the property manager regarding same (.2); review email from J. Wine and provide requested documentation from closing (4520 S. Drexel) (.1); exchange correspondence with other property management regarding status of new leases or renewals for the remainder of the properties in the EquityBuild estate (.2); review email from property management regarding status of due diligence documents related to single family homes (.1).

**Asset Disposition** 

**AEP** 

1.80 Review pro forma title insurance policies for receivership properties under contract of sale (1131 E 79th, 6250 S Mozart, and 3074 E Cheltenham) (.2); review purchase and sale contract submitted by prospective purchaser of receivership property (2800 E 81st), edit and revise same, and transmit to K. Duff for execution (.3); review counter-initialed purchase and sale contracts to purchase receivership properties (2800 E 81st and 7701 S Essex), transmit associated SJO's to title underwriter, and update closing spreadsheets (.2); review revised title commitments and invoices in connection with receivership properties under contract (2764 W 64th, 5618 S King, 6356 S California, and 6355 S Talman), update closing checklists, and transmit same to buvers' counsel (.3); review countersigned purchase and sale agreements and SJO instructions for receivership properties (816 E Marquette, 4750 S Indiana, and 7024 S Paxton), update closing spreadsheets, and transmit SJO's to title company with instructions regarding earnest money (.3); respond to title underwriter e-mail regarding timing of closings of properties subsumed within eighth, ninth, and current tranches (.1); review receiver-signed purchase and sale agreement in connection with receivership property (2800 E 81st), update closing checklist, and transmit copy to buyer's counsel with instructions (.1); review purchase and sale contract for receivership property (7840 S Yates) as countersigned, prepare incoming wire instructions, update closing checklist, and transmit same to buyer's counsel (.1); read e-mails relating to prospective payment of real estate taxes at receivership property (4533 S Calumet) and acceptance of new lease application and convey relevant information to counsel for prospective purchaser (.2).

**Asset Disposition** 

8/21/2020 JR

0.50 Review email from property manager regarding updated income statements for single family homes and respond regarding same (.1); exchange correspondence with property manager regarding payment of taxes for property (4533 Calumet) related to prospective tenants (.2); exchange correspondence with A. Porter regarding same (4533 Calumet) (.1); further communication with buyer's counsel regarding same (4533 Calumet) (.1).

8/24/2020 JR

1.20 Review email from property management regarding housing assistance for various tenants (.2); confer with A. Porter regarding same (.1); review status of water certificate applications for upcoming closings for tranche 9 (.2); exchange correspondence with the title company regarding same (.1); review email from K. Pritchard regarding tranche 9 wire instructions (.6).

**Asset Disposition** 

AEP

1.10 Read opposition to ninth motion to confirm sales filed by certain lenders and prepare e-mail to all counsel, title underwriters, and surveyors regarding implication of certain lenders' objection on scheduling of closings.

**Asset Disposition** 

8/25/2020 JRW

0.20 Review proposed order partially granting 9th motion to confirm sales and related correspondence with A. Porter and M. Rachlis.

Asset Disposition

JR

4.20 Draft water certificate applications for various properties in tranche 9 (2.4); exchange communication with the title company regarding same (.3); update closing checklist regarding same (.5); follow up communication with the title company regarding status of previously submitted water applications (.2); exchange correspondence with buyer's counsel regarding buyer information requested for closings (7201 Dorchester and 1700 Juneway) (.2); review email from property management regarding request to produce buyer information for previously sold property (7110 Cornel) (.1); exchange correspondence with A. Porter regarding request from property manager to review and process subsidy for various tenants (6250 Mozart and 1700 Juneway) (.3); exchange correspondence with the title company and buyer' counsel regarding cancelling of a previously scheduled closing (7201 Dorchester) (.2).

**Asset Disposition** 

MR

0.90 Further attention to submission/objection on property sales (.3); attention to issues on property sales extensions (7749 Yates) and cancellation of purchase (2800 81st) (.2); attention to motion to strike (.1); attention to draft order on other properties that were not objected to and follow up regarding same (.3).

**Asset Disposition** 

AEP

3.50 Conference with J. Rak to review status of execution of all purchase and sale agreements in most recent marketing tranche and deposits of earnest money and prepare e-mail to title company requesting confirmation of receipts of earnest monies (.5); review purchase and sale contracts submitted in connection with prospective purchase of receivership properties (6217 S Dorchester and 7255 S Euclid), research corporate identity of prospective purchaser, and prepare e-mail to counsel for prospective purchaser requiring

resubmission of contracts with valid legal entity (.2); read e-mail from title company regarding earnest money deposits received thus far in connection with receivership properties (4533-47 S Calumet, 7024-32 S Paxton, 4317 S Michigan, 7442 S Calumet, 7701 S Essex, 816 E Marquette, and 4750 S Indiana) and prepare e-mail to counsel for all buyers confirming receipt of same (.2); communications with K. Duff and M. Rachlis regarding termination letter received from prospective purchaser of receivership property (2800 East 81st) (.2); communications with counsel for prospective purchaser of receivership property (7840 S Calumet) regarding request for extension of inspection period (.2) and communications with K. Duff and M. Rachlis relating thereto (.1); teleconference with counsel for purchaser of receivership properties (1131 E 79th and 6250 S Mozart) regarding nature of objections to ninth motion to confirm sales and potential intervention by purchaser for purpose of briefing reply to lender's objection (.3); revise proposed order partially granting ninth motion to confirm sales to remove receivership property (1700 W Juneway) to which objection to confirmation was asserted (.1); communications with counsel for purchaser of receivership property (1700 W Juneway) regarding delay occasioned by lender objection to ninth motion to confirm (.1); (cont'd in next entry).

#### Asset Disposition

8/25/2020 AEP

(Cont'd from previous entry) Read e-mail from property manager regarding tenant applications for benefits and forward same to counsel for purchasers of affected properties (6250 S Mozart and 1700 W Juneway) with request for guidance (.2); research files for relevant information relating to original acquisition of receivership property (6356 S California) and prepare hold harmless request in order to obtain deletion of three special exceptions on title commitment (.5); research files for relevant information relating to original acquisition of receivership property (7508 S Essex) and prepare hold harmless request in order to obtain deletion of three special exceptions on title commitment (.4); research files for relevant information relating to original acquisition of receivership property (7953 S Marquette) and prepare hold harmless request in order to obtain deletion of three special exceptions on title commitment (.5).

## **Asset Disposition**

8/26/2020 JR

4.80 Exchange correspondence with buyer's counsel related to requested property information (1700 Juneway) (.1); follow up correspondence with the title company regarding water application status of various applications (.3); follow up correspondence with property management regarding information related to tenants (.2); exchange correspondence with buyer's counsel requesting various buyer information for closing related to property (7201 S. Constance) (.5); further correspondence with buyer and buyer's counsel regarding request of buyer information for property (6558 S. Vernon) (.2); exchange correspondence with the title company requesting updates to title commitments for various files and properties (.2); exchange correspondence with real estate agent requesting commission statements for various properties in anticipation of sale (.2); update water applications for various properties in anticipation of sale (.4); further communication with the title company regarding same (.2); draft closing documents for property (7201 Constance) in anticipation of closing (2.5).

8/26/2020 AEP

0.70 Communications with counsel and with broker for prospective purchaser of receivership property (7840 S Yates) regarding pre-closing walk-through rights, material destruction issues, due diligence issues, judicial process, and anticipated timing of closing (.4); assemble exhibits for hold harmless requests signed by K. Duff in connection with special exceptions on title commitments associated with receivership properties (6356 S California, 7508 S Essex, and 7953 S Marquette) and transmit same to appropriate title insurers with explanatory e-mail (.3).

Asset Disposition

8/27/2020 JR

3.70 Exchange correspondence with the title company water department regarding status of water applications (.1); exchange correspondence with property management regarding available funds for tax payment related to various properties (4611 Drexel, 6217 Dorchester and 1131 E. 79th) (.2); exchange correspondence with property management regarding available funds for property taxes related to properties (7255 Euclid, 6250 Mozart and 7109 Calumet) (.2); exchange correspondence with K. Duff providing details related to property tax status and available funds for payment (.3); exchange correspondence with property management requesting updated information for upcoming closings (7201 Constance, 7201 Dorchester, 7953 Marquette, 6356 California, 2736 W 64th and 6355 Talman) (.2); exchange correspondence with property management requesting updated information for upcoming closings (7051 S. Bennett, 3074 Cheltenham and 7508 Essex) (.2); exchange correspondence with buyer's counsel requesting buyer information in preparation for closing (7201 Dorchester) (.2); review email from property management and update property information (7051 S. Bennett, 3074 Cheltenham and 7508 Essex) (.2); review email from broker regarding commission statements and update electronic files regarding same (.2); draft closing documents for property (7201 Dorchester) (1.9).

**Asset Disposition** 

AEP

1.10 Read communications regarding acceptance of backup bid following default on prospective acquisition of receivership property (2800 E 81st) and notification of new highest bid to putatively secured lender (.1); read e-mails from prospective purchaser of receivership property (816 E Marquette) and request documentation from property manager (.1); read, research files, and respond to email from prospective purchaser of receivership property (7201 S Dorchester) regarding leases and unit at the building (.2); read response to hold harmless request submitted in connection with receivership property (7953 S Marguette), review title commitment following denial of request, and prepare email to title underwriter requesting copies of underlying documentation (.2); review revised title commitments received in connection with single-family residence portfolio and other receivership properties (7953) S Marquette, 7051 S Bennett, 7201 S Constance, and 7508 S Essex) and transmit same to counsel for prospective purchasers (.3); review status of earnest money deposits in connection with current sales tranche and send emails to title company and counsel for purchasers of receivership properties (4611 S Drexel and 1422 E 68th) regarding status of earnest money deposits (.2).

8/28/2020 JR

7.10 Exchange correspondence with buyer's counsel requesting buyer information for closing (7051 S. Bennett) (.2); review email from buyer's counsel and update electronic files with buyer information (7051 S. Bennett) (.2); draft closing documents regarding same (7051 S. Bennett) (3.3); exchange correspondence with buyer's counsel requesting buyer information related to upcoming closings (6356 S. California, 2736 W 64th, 6355 S Talman and 5618 S. Martin Luther King) (.2); review email from property management and update electronic files regarding requested property information for upcoming closings (7201 Constance, 7201 Dorchester, 7953 Marquette, 6356 California, 2736 W 64th and 6355 Talman) (.3); draft closing documents in preparation for closing (1131 E. 79th) (2.9).

**Asset Disposition** 

8/31/2020 JR

7.40 Review emails related to status of various property closings (.2); review email from property management and update closing documents (.3); review email from real estate agent related to commission statements for various properties (.1); update electronic files regarding same (.4); review email from A. Watychowicz regarding request to produce sold properties and motions filed related to objections (.1); continue drafting preliminary closing documents in anticipation for closing (6356 S. California) (1.2); draft preliminary closing documents for property (2736 W. 64th) in anticipation of closing (2.7); draft preliminary closing documents for property (6355 S. Talman) in anticipation of closing (1.6); prepare preliminary closing documents for property (3074 Cheltenham) in anticipation of closing (.8).

Asset Disposition

**AEP** 

0.70 Read denial of hold harmless requests in connection with receivership properties (7508 S Essex and 6356 S California), review publicly-recorded documents enclosed therewith, and prepare responses requesting copies of actual title policies (.5); teleconference with K. Duff regarding receivership properties (6250 S Mozart and 1131 E 79th) (.2).

**Asset Disposition** 

SUBTOTAL: [16.90 27051.00]

## **Business Operations**

8/3/2020 KMP

2.60 Review and analysis of property expenses (2.4); confer with K. Duff and J. Rak regarding potential payment of certain expenses related to property (638 N Avers) (.2).

**Business Operations** 

**JRW** 

1.50 Correspondence to K. Duff and A. Porter regarding matter scheduled for hearing (8209 S Ellis) (.3); analyze pending administrative proceedings against sold properties (8209 S Ellis, 7546 S Saginaw, 4520 S Drexel) and related correspondence with A. Porter and K. Duff regarding litigation

Date	Indiv	Hours	Description

spreadsheet in connection with property sales (1.2).

**Business Operations** 

8/4/2020 KMP 3.70 Continue review and analysis of property expenses.

**Business Operations** 

ED 2.60 Review and analysis of summary reporting prepared by accountant based on April accounting reports (1.9); email correspondence with accountant regarding comments and questions relating to same (.4); email correspondence with K. Duff and M. Rachlis regarding response to query from lender's counsel relating to calculation of reimbursable amounts for certain properties (.3).

**Business Operations** 

JRW 0.30 Review continuance order (4520 S Drexel), update records and related email to A. Porter (.2); review correspondence from K. Duff regarding lien against property (7237 S Bennett) (.1).

**Business Operations** 

MR 0.40 Attention to issues on restoration motion and issues raised by lender.

**Business Operations** 

8/5/2020 KMP 4.10 Continue review and analysis of property expenses.

**Business Operations** 

JR 0.20 Review 2018 tax sale information with the City of Chicago treasurer and exchange correspondence with K. Duff regarding same.

**Business Operations** 

8/6/2020 KMP 4.60 Continue review and analysis of property expenses.

**Business Operations** 

ED 2.40 Research regarding corporate status issue (.6); review and analysis of loan agreement provisions (.2); prepare and transmit April accounting reports to lenders' counsel (1.6).

**Business Operations** 

JRW 2.30 Prepare for (.2) and appear at administrative hearing on violation (7749 S Yates) (1.7); review code violation orders (7109 S Calumet, 6250 S Mozart) and update docket (.4).

#### **Business Operations**

8/6/2020 AW

0.90 Work on accounting reports for institutional lenders on property by property basis with addition of properties that have been sold, communicate with E. Duff regarding drafts that need to be supplemented (.8); communicate with J. Wine regarding entity (.1).

**Business Operations** 

8/7/2020 KMP

6.00 Prepare forms for funds transfers to property manager for utility bills (7656 Kingston, 7201 S Constance, 7957 Marquette), and to finance company for installment on insurance premium financing, and communications with bank and K. Duff regarding same (7656 Kingston, 7201 S Constance, 7957 Marquette) (.4); communicate with property manager to confirm funds transfer (.1); continue review and analysis of property expenses and communicate with K. Duff regarding same (4.4); review records relating to certain assets and forward records to EB team for review (.3); review financial reporting from property manager and compile documentation relating to certain property (4317 S Michigan) (.6); telephone conference and communication with K. Duff and asset manager regarding same (4317 S Michigan) (.2).

**Business Operations** 

**JRW** 

1.00 Study statement from property manager and related correspondence regarding accounts payable (.2); attention to new notices of code violations from city (4520 S Drexel, 7750 S Muskegon) and related updating of records and exchange of correspondence with A. Porter and K. Duff (.8).

**Business Operations** 

8/10/2020 JRW

0.40 Email exchange with property manager regarding Fire Prevention Bureau Report (7508 S. Essex) (.1); confer with property manager regarding June results summary (.2); related review of revised spreadsheet (.1).

**Business Operations** 

8/11/2020 JRW

3.30 Review notices of code violations (6949 S Merrill, 8209 S Ellis, 7024 S Paxton, 4520 S Drexel) and update records regarding same (.8); exchange correspondence with A. Porter regarding City notice (7024 S. Paxton) (.2); exchange correspondence with J. Rak regarding status of property sale (7508 S. Essex) (.1); exchange correspondence with K. Duff regarding quote for repairs to address violations at property (7508 S. Essex) (.1); correspondence to A. Porter, J. Rak and K. Duff regarding notice of violation (8209 S Ellis) and evidence of property sale (.2); review correspondence with property manager regarding plan to address City notice (7024 S Paxton) (.1); correspondence to property manager regarding notices of code violations (6949 S Merrill) (.2); study corrected spreadsheet from property manager regarding outstanding accounts payable (8201 S Kingston, 8047 S Manistee, 7749 S Yates and 7051 S Bennett ) and related email to K. Duff and A. Porter regarding corrections (.6); email exchange with corporation counsel

regarding housing court orders and related review of orders and updating of records (7300-04 S St Lawrence, 8107-09 S Ellis, 7237-43 S Bennett, 6749-59 S. Merrill, 638-40 N. Avers, 7201 S Constance, 7600 S. Kingston, 7110 S Cornell, 6217-27 S Dorchester) (1.0).

**Business Operations** 

8/13/2020 ED

0.30 Email correspondence with A. Porter regarding reimbursable amounts from properties to be listed for sale (.1); review and analysis of related documents and reports (.2).

**Business Operations** 

8/14/2020 JRW

0.80 Research regarding pending administrative matter and draft correspondence regarding pending matter and new notice of violations regarding sold property (8209 S. Ellis) (.4); review orders and correspond with A. Porter regarding code violations (7110 S Cornell, 6949 S Merrill) (.2); exchange correspondence with ownership unit and J. Rak regarding warranty deed and dismissal of matters (8209 S. Ellis) (.1); correspondence with property manager and K. Duff regarding July results summary (.1).

**Business Operations** 

8/16/2020 ED

0.60 Email to J. Wine regarding calculation of restoration due to properties (.2); review and analysis of financial reporting information related to preparation of May 2020 accounting reports (.3); email correspondence to accountant regarding same (.1).

**Business Operations** 

8/17/2020 KMP

0.50 Study property manager's request for funds relating to utility bills (.2); communicate with K. Duff and J. Wine regarding property manager's reconciliation for certain sold properties (7749 S Yates, 8201 S Kingston, 8047 S Manistee) and provide updated account balances for these properties to J. Wine (.3).

**Business Operations** 

**JRW** 

1.00 Exchange correspondence with property manager regarding property repairs (6949 S Merrill) and related review of photographs (.2); related communication with K. Pritchard regarding account balances (.1) and with K. Duff regarding financial reports (.2); review orders and violation notices and follow-up correspondence with property manager regarding additional violations (6949 S Merrill) (.5).

**Business Operations** 

8/18/2020 JRW

0.30 Review new notice of violations (7110 S. Cornell) and related communications with A. Porter (.2); correspondence from property manager regarding necessary work to address code violations (6949 S. Merrill) (.1).

**Business Operations** 

8/19/2020 JRW

2.20 Telephone conference with collections counsel and related communication with K. Duff (.2); review new violations notices from City (6217 Dorchester, 4520 S Drexel, 7110 S Cornell) and related exchange with A. Watychowicz and A. Porter (.2); exchange correspondence with property manager regarding payment of fines (6217 S Dorchester) (.2); study judgment orders entered in administrative matters (7026 S Cornell) and related analysis to K. Duff and A. Porter (.6); exchange correspondence with A. Porter regarding Department of Sanitations violations set for hearing (4520 S Drexel) (.2); telephone conference with insurance counsel regarding status of various matters (.5); review draft discovery responses and related communications with K. Duff (.3).

**Business Operations** 

8/20/2020 JRW

0.90 Exchange correspondence regarding entry of orders (8209 S. Ellis) (.1) and notices of violations (4520 S Drexel) (.3); confer with collections counsel, cursory review of orders and related email to A. Porter (.3); correspondence regarding sanitation matters (4520 S Drexel) and related exchange of correspondence with A. Porter and K. Duff (.2).

**Business Operations** 

ED 2.50 Review and analysis of reporting from property manager and related correspondence relating to sold properties (7749 S Yates, 8201 S Kingston, 8047 S Manistee) (1.6); email correspondence with property manager regarding same (.1); preparation of spreadsheet as basis for discussion with property manager (.8).

**Business Operations** 

AEP 0.50 Read, research, and respond to e-mails regarding collection notice received in connection with receivership property (7026 S Cornell) (.4); read correspondence from J. Wine regarding continued hearings in connection with administrative notices of violation filed against former receivership property (4520 S Drexel) and prepare response thereto (.1).

**Business Operations** 

JR 0.40 Review email from property management regarding payment of real estate taxes for property (4533 S. Calumet) (.2) exchange correspondence with K. Duff and property management regarding same (4533 S. Calumet) (.2).

**Business Operations** 

8/21/2020 JRW

2.20 Study spreadsheets and review and comment on spreadsheet with questions for property manager (.6); correspondence to A. Porter regarding payment of judgment (7026 S Cornell) (.1); correspondence regarding dismissal order (8209 S. Ellis) (.1); telephone conference with A. Porter and K. Duff regarding strategy for handing administrative proceedings concerning sold properties

and specific pending matters (4520 S Drexel, 7110 S Cornell; 7026 S Cornell) (1.0); review settlement agreement and related communications with K. Duff (.4).

**Business Operations** 

8/21/2020 ED

0.70 Follow up with K. Duff, K Pritchard, and A. Porter regarding information requested by accountant for preparation of May accounting reports (.3); email correspondence with property manager regarding assistance to insurance inspector (.1); update analysis of apparent reporting discrepancies for discussion with property manager (.2) and email correspondence with property manager and J. Wine relating to same (.1).

**Business Operations** 

AEP 0.90 Teleconference with J. Wine and K. Duff regarding administrative and housing court actions.

**Business Operations** 

8/24/2020 JRW

2.60 Prepare for administrative hearings (.2) and appearance in administrative court on three Department of Sanitation matters (4520 S Drexel) (2.0); prepare orders and related correspondence with A. Porter and K. Duff (.1); correspond with property manager regarding payment of judgment (4520 S Drexel) (.1); update records and correspondence with A. Porter and J. Rak regarding dismissal order (8209 S. Ellis) (.2).

**Business Operations** 

JR 1.10 Review various property tax balances.

**Business Operations** 

8/25/2020 JRW

MR

0.20 Exchange correspondence with property manager and A. Porter regarding payment of judgment (4520 S Drexel).

**Business Operations** 

ED 0.40 Email correspondence with insurance agent, accountant, property manager, and A. Porter regarding details and backup for information to include in May accounting reports to lenders.

**Business Operations** 

0.30 Attention to follow up on objections to restoration motion and review additional materials regarding same.

**Business Operations** 

Date	Indiv	Hours [	Description
8/25/2020	JR	0.90	Review property tax bills for the 2nd installment of 2019 on all properties.
			Business Operations
8/26/2020	JRW	0.20	Exchange correspondence with property manager regarding financial reports for properties (7749 S. Yates, 8201 S Kingston, 8047 Manistee).
			Business Operations
	MR	0.30	Attention to issues on rent restoration and follow up regarding same.
			Business Operations
8/27/2020	KMP	0.40	Communicate with K. Duff regarding property manager's fund requests for utility payments and other expenses and draft request forms for same.
			Business Operations
	JRW	0.70	Review City of Chicago Covid-19 updates and form certificate of completion (.1); exchange correspondence with property manager regarding accounts payable (.2); review property management files for documentation of repairs performed on property (8107 S Ellis) (.4).
			Business Operations
8/28/2020	KMP	0.60	Prepare forms for funds transfers for property manager's requests for utility payments for various properties, insurance premium financing agreement, and lawn services at property (1102 Bingham), and communications with K. Duff and bank representatives relating to same.
			Business Operations
	MR	0.20	Attention to issues on objections to restoration motion.
			Business Operations
8/31/2020	KMP	0.20	Communicate with property manager confirming funding for utility payments for various properties and specifying disposition of funds,
			Business Operations
	JRW	0.20	Email to A. Porter regarding notice of violation (8209 S Ellis) (.1); review orders from administrative court (7109 S Calumet, 6250 S Mozart) (.1).
			Business Operations
AL:			[58.40 <u>13613.00]</u>
ministration	1		
8/18/2020	AW	0.20	Attention to entered administrative court orders (7110-16 S Cornell, 8209 S Ellis), communicate with J. Wine regarding same, and update docket.

**Case Administration** 

Date	Indiv	Hours Description
8/19/2020	) AW	0.40 Attention to orders entered by administrative court and communicate with J. Wine regarding same (4520 S Drexel, 6217 S Dorchester, 7110 S Cornell).
		Case Administration
8/27/2020	) AW	0.80 Confer with J. Wine regarding online platforms and email follow up with K. Duff regarding same (.2); call with IT consultant regarding online platform (.3); research and draft email to online vendor regarding license (.3).
		Case Administration
8/28/2020	) AW	0.80 Prepare pleadings and request updates to Receivership website.
		Case Administration
8/31/2020	) AW	0.80 Communicate with K. Duff regarding hearing transcripts.
		Case Administration
TAL:		[ 3.00 420.00

#### Claims Administration & Objections

8/2/2020 JRW 0.20 Correspondence with K. Duff regarding claims against property (1131-41 E 79th) and prepare spreadsheet regarding same.

Claims Administration & Objections

8/3/2020 JRW 5.10 Research regarding claimant (.1); review and confer with A. Watychowicz regarding draft responses to claimant inquiries (1.0); correspondence to claimant's counsel regarding volume of data (.1); review and revise draft protective order and related communications with M. Rachlis and K. Duff (.6); review proofs of claim against property (1131-41 E 79th) and related analysis to team (1.8); prepare for and attend conference with potential discovery vendor and claimant's counsel regarding database proposal (1.3) and related follow-up communication (.2).

Claims Administration & Objections

AW 1.00 Communicate with claims vendor regarding revisions to database (.1); work with K. Duff and J. Wine on responses to claimants' emails (.7); reach out to claims vendor regarding claim (.1); communicate with J. Wine regarding volume of gathered bank statements (.1).

Date	Indiv F	lours Description
8/3/2020	MR	0.80 Attention to protective order issues (.3); follow up and review materials regarding claimants' motion to intervene (.3); attention to issues on property (1131 E 79th Street) claims and exchange email on same (.2).
		Claims Administration & Objections
8/4/2020	JRW	3.90 Legal research regarding protective order issue and related analysis to K. Duff and M. Rachlis (.7); further revision of protective order (.2); review standard interrogatories and document requests, and prepare email analysis of same (.7); exchange correspondence with M. Rachlis and K. Duff regarding standard interrogatories and requests for production (.1); attention to researching claimant inquiries (.9); correspondence with claims vendor regarding deleted clams (.1); legal research regarding claims analysis issue (1.2).
		Claims Administration & Objections
	AW	1.40 Attention to email from claimant and discuss same with K. Duff (.1); work on claimant's communications regarding claim and multiple communications with claims vendor regarding same (.6); communicate with K. Duff and J. Wine regarding claimant's communication (.1); email claimant regarding potential claim and response to follow-up email (.2); research and follow up with J. Wine regarding proposed protective order (.2); communicate with IT consultant regarding former EquityBuild employees' email accounts and follow up with J. Wine regarding same (.2).
		Claims Administration & Objections
	MR	0.40 Attention to issues on standard discovery and issues on EB document library.
		Claims Administration & Objections
8/5/2020	JRW	6.40 Exchange correspondence with K. Duff and M. Rachlis regarding revised protective order and forward same to counsel for institutional (.2); prepare responses and related correspondence with K. Duff and A. Watychowicz regarding multiple claimant inquiries (3.7); correspondence with claims vendor regarding claim (.1); study multiple claim submissions (1.0); review records for various funds and update property spreadsheet (1.4).
		Claims Administration & Objections
	AW	1.10 Communicate with K. Duff regarding responses to claimants and finalize

EquityBuild properties (.1).

Claims Administration & Objections

responses (.7); work with claims vendor regarding claim and other issues (.3); communicate with K. Duff and J. Wine regarding claims against former

<u>Date</u>	Indiv F	Hours Description
8/5/2020	MR	0.30 Review communications to claimants and attention to protective order.
		Claims Administration & Objections
8/6/2020	JRW	2.80 Email exchanges with K. Duff, A. Watychowicz and claims vendor regarding claim and available claim numbers (.3); respond to claimant inquiries (.6); telephone conference with A. Watychowicz regarding same (.3); confer with K. Duff regarding analysis of claims (1.6).
		Claims Administration & Objections
	AW	1.60 Work on issue regarding records submitted by claimant and resolution with claims vendor and J. Wine (.8); attention to late claim (.3); follow up with K. Duff regarding claims against former properties (.1); communicate with K. Duff and J. Wine regarding further communication from claimant and email claims status update to claimant (.1); communicate with claimants regarding their claims submissions (.3).
		Claims Administration & Objections
8/7/2020	JRW	4.20 Conference call with counsel for claimants and potential documents database vendor regarding database proposal (1.5); conference call with K. Duff and M. Rachlis regarding EquityBuild documents and claimants' motion to intervene (.9); attention to claimant inquiries and related correspondence with K. Duff and A. Watychowicz (.3); continued analysis of claims by property (1.5).
		Claims Administration & Objections
	AW	0.60 Email detailed responses to communications from claimants (.3); follow up with counsel regarding responses to claimants (.1); review draft standard discovery requests to claimants and email exchanges with J. Wine regarding same (.2).
		Claims Administration & Objections
	MR	1.00 Conferences on issues regarding claims related issues (.9); attention regarding response to claimant (.1).
		Claims Administration & Objections
8/10/2020	) JRW	2.10 Attention to draft standard interrogatories and document requests and related exchange of comments with M. Rachlis and K. Duff (.7); continued analysis of claims by property and fund balances by property (1.4).
		Claims Administration & Objections

8/10/2020 AW

0.70 Confirm receipt of claim (.1); review claims, update master claims list and request update to claims database and removal of duplicate (.4); review and communicate with J. Wine regarding potential responses and interrogatories to claimants (.2).

Claims Administration & Objections

MR 1.50 Work on discovery related issues and court order.

Claims Administration & Objections

8/11/2020 JRW

2.40 Review proofs of claim and work with A. Watychowicz regarding duplicative claims (.3); telephone conference with SEC (.4); draft revised set of standard interrogatories to investors (1.7).

Claims Administration & Objections

AW 0.60 Attention to voice message from claimant and work with K. Duff and J. Wine on response to same (.2); review and communicate with J. Wine regarding claim and amounts claimed (.4).

Claims Administration & Objections

MR 1.00 Preparation for upcoming hearing before Judge Lee on claims process.

Claims Administration & Objections

8/12/2020 JRW

7.20 Draft proposed standard interrogatories and document requests to investors (1.8); related analysis and exchange of drafts with M. Rachlis and K. Duff (.2); legal research regarding intervention by receivership claimants and related analysis to K. Duff and M. Rachlis (1.5); draft correspondence to claimant's counsel regarding standard discovery requests and related communications with and revisions from M. Rachlis (.6); telephone conference with M. Rachlis and K. Duff regarding motion to intervene, standard discovery responses, and preparation for continued hearing on claims process motion (1.1); prepare standard discovery requests to institutional lenders (1.3); correspondence with SEC (.3); analysis of receiver's role (.2); review and revise correspondence to counsel for lenders regarding motion to intervene (.2).

Claims Administration & Objections

AW 1.20 Respond to claimant's update request (.1); review and communicate with K. Duff and J. Wine regarding claimant's counsel update request (.3); follow up communication with IT consultant regarding accounts payable email project (.1); phone call with J. Wine regarding potential discovery requests to claimants and follow up email to J. Wine, K. Duff and M. Rachlis regarding same (.8).

Date Ir	ndiv Ho	ours Description
8/12/2020	MR	4.70 Review and revise of draft discovery and comment on same and letter regarding same (1.2); conferences with J. Wine and K. Duff regarding discovery and upcoming hearing (1.1); further preparation for hearing (2.4).
		Claims Administration & Objections
8/13/2020	JRW	5.20 Review proposed revisions to protective order and related email to counsel, K. Duff and M. Rachlis (.3); review court's directives for telephonic hearing (.2); telephone conference with M. Rachlis and SEC (.3); telephone conference with K. Duff and M. Rachlis regarding standard discovery and preparation for hearing (.2); confer with A. Watychowicz regarding EquityBuild documents (.1); review and revise draft discovery requests (1.2); related correspondence to claimant's counsel (.2); prepare presentation for court regarding EquityBuild documents and related preparation for hearing (.9); attend telephonic hearing before Judge Lee on intervention motion, claims process motion, EquityBuild documents and standard discovery (1.2); related telephone conference with M. Rachlis and K. Duff regarding judge's rulings and request for statistics regarding claims (.6).
		Claims Administration & Objections
	AW	0.60 Communicate with K. Duff regarding voicemail from claimant regarding investment (.2); communicate with J. Wine regarding claimant's request made to court (.3); draft response to email inquiry (.1).
		Claims Administration & Objections
	MR	5.10 Further preparation for hearing before Judge Lee (2.3); conference with J. Wine and K. Duff regarding same (.6): participate in hearing (1.2); conferences on discovery issues raised by court with K. Duff and J. Wine (.2); follow up and review response to intervention motion (.5); further conferences with J. Wine and K. Duff (.3).
		Claims Administration & Objections
8/14/2020	AW	0.30 Communicate with A. Porter regarding claims against former property (7107 S Bennett) and documents submitted in support of same.
		Claims Administration & Objections
8/17/2020	JRW	1.00 Attention to responding to inquiry from claimant (.1); continued analysis of claims (.9).
		Claims Administration & Objections
	AW	0.20 Respond to claimant's voice message and request for information.
		Claims Administration & Objections

8/18/2020 JRW

1.40 Telephone conference with K. Duff and M. Rachlis regarding request from claimants' counsel for production of claim forms (.3), related analysis (.3) and follow-up call with M. Rachlis and K. Duff (.5); review proposed responses to claimant inquiries and related communication with A. Watychowicz (.3).

Claims Administration & Objections

AW 1.30 Attention to communications regarding response to claimants, additional inquiries from claimants, and follow up from another claimant (.5); review claims (6951 S Merrill), revise master claims sheet, and request updates to claims database (.6); continued communication with A. Porter and S. Zjalic regarding supporting documentation submitted in support of claims against property (7107 S Bennet) (.2).

Claims Administration & Objections

8/19/2020 JRW 0.30 Attention to responses to claimant inquiries.

Claims Administration & Objections

AW 0.40 Respond to claimant's update request (.1); communicate with K. Duff and J. Wine regarding response to claimants' emails (.2); attention to notice regarding debt collection (7026 S Cornell) and communicate with K. Duff and J. Wine regarding same (.1).

Claims Administration & Objections

8/20/2020 JRW

0.40 Review proof of claim and supporting documents and related communications with A. Watychowicz regarding necessary revisions to master claims spreadsheet.

Claims Administration & Objections

AEP 0.30 Read all correspondence between investor-lender and K. Duff regarding mortgagee rights in properties not subsumed within receivership estate and reconcile investor-lender allegations with existing evidence.

Claims Administration & Objections

8/23/2020 JRW 0.40 Review claims submitted by claimant.

Claims Administration & Objections

8/24/2020 JRW 0.30 Review opposition to restorations of funds motion and related review of motion and exhibits and correspondence to team (5450 Indiana, 7749 Yates).

8/25/2020 JRW

1.40 Study proofs of claim forms for property (1131-41 E 79th) and related analysis to K. Duff and A. Porter (.8); review objections from institutional lender claimants to 8th motion to confirm sale (.6).

Claims Administration & Objections

AW

0.60 Communicate with counsel regarding draft responses to claimants' emails and respond to claimants' emails (.4); request update to claims database as per claimant's email and cover letter and follow up with vendor regarding same (.2).

Claims Administration & Objections

8/26/2020 JRW

1.80 Exchange correspondence with K. Duff regarding claims against properties (1131-41 E 79th and 6250 S Mozart) (.1); study claims for property (6250 S. Mozart) and related analysis to K. Duff and A. Porter (1.7).

Claims Administration & Objections

8/27/2020 JRW

4.50 Attention to responding to claimant inquiries (1.2); related review of information and confer with A. Watychowicz regarding claimant (.1); telephone conference with counsel for claimant (.1), related review of claim forms (.8); study proofs of claim for properties (6205 S Mozart and 1131 E 79th) (2.3).

Claims Administration & Objections

AW

1.20 Revisions to master claims list as per claimant's summary and follow up communication with claims vendor (.3); work with K. Duff on responses to claimants' emails and email responses (.9).

Claims Administration & Objections

AEP 0.40 Review and analyze files associated with objections to ninth motion to confirm sales of receivership properties (1131 E 79th and 6250 S Mozart) and provide response to K. Duff regarding status of encumbrances against same.

Claims Administration & Objections

8/28/2020 JRW

5.40 Legal research regarding objections to 9th motion to confirm sale (1.7); review and revise response to claimant inquiry (.1); continued review of documents submitted in support of claims against properties (6250 S Mozart and 1131-41 E. 79th) and prepare spreadsheet and analysis regarding same (2.6); confer with A. Watychowicz regarding updates to master claims spreadsheet (.1); exchange correspondence with claimant's counsel regarding motion to file oversized brief (.1); confer with K. Duff regarding further analysis regarding (timing of investments) (.1); review claims and supporting documentation (6250 S. Mozart) (.7).

Date	Indiv	Hours [	Description
8/28/2020	AW	1.70	Work on email response to claimant (.2); research regarding authority cited in lender's objection to rent restoration motion (1.5).
			Claims Administration & Objections
8/31/2020	KMP	3.20	Compile and review pleadings, transcripts, orders and other materials relating to objections to sales motion and confer with K. Duff regarding same.
			Claims Administration & Objections
	JRW	6.30	Legal research and begin outlining reply brief (3.6); finish reviewing claims and supporting documentation (6250 S. Mozart) (1.5); confer with A. Watychowicz and K Duff regarding documents submitted by claimant (.2) and review same (.3); correspondence to K. Duff and M. Rachlis regarding rollover paperwork (.2); exchange correspondence with K. Duff regarding loans against property (6250 S Mozart) (.4); exchange correspondence with potential e-discovery vendor (.1).
			Claims Administration & Objections
	AW	2.90	Communicate with J. Wine regarding documents received from claimants and research regarding same (.9); communicate with claims vendor regarding update to database and prepare documents for same (.6); email exchange with K. Duff regarding hearing related to claims (.2); work on charts requested by Judge Lee (.8); review of pleadings relating to objections to sales motion (.4).
			Claims Administration & Objections
TAL:			[98.80 25231.00]
ues			
8/3/2020	KMP	0.20	Review copies of additional entity tax returns received from EB accountant.
			Tax Issues
8/12/2020	AW	0.50	Email K. Duff Forms 8879-PE for multiple properties (526 W 78th LLC; 1401 W 109th; 1516 E 8th; 4750 Indiana LLC; 6759 S Indiana; 6807 S Indiana; 8809 S Wood; 11318 S Church; 4755 S St Lawrence).
			Tax Issues

<u>D</u>	Date I	ndiv	Hours D	Description			
8	/12/2020	MR	0.20	Conferences regarding taxes with J. Wine and K. Duff.			
				Tax Issues			
8	3/19/2020	AW	0.20	Attention to EIN requests from IRS (11117-39 S Longwo and email accountant regarding same.	ood, 7749 S Yate	es)	
				Tax Issues			
8	/20/2020	AEP	0.30	Review IRS letters relating to mismatched entity names corrective information, and respond to receivership accordance.	letters relating to mismatched entity names and EIN's, locate formation, and respond to receivership accountant.		
				Tax Issues			
SUBTOTAL	L:				[ 1.40	321.00]	

280.00

\$66,846.00

Other Charges			
	Description		
Business Operations			
	Software monthly license fees for August 2020 (Google, \$96; InSynq, \$266.50)	O	362.50
	Online research for August 2020		720.11
	Process Server - fees for service of discovery subpoenas		417.50
	Photocopies for August 2020		29.00
SUBTOTAL:		[	1,529.11]
Total Other Charges			\$1,529.11

Summary	of	Activity
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	Hours	Rate	
Jodi Wine	83.30	260.00	\$21,658.00
Ania Watychowicz	22.00	140.00	\$3,080.00
Justyna Řak	76.50	140.00	\$10,710.00
Kathleen M. Pritchard	27.60	140.00	\$3,864.00
Andrew E. Porter	38.00	390.00	\$14,820.00
Ellen Duff	9.50	390.00	\$3,705.00
Michael Rachlis	23.10	390.00	\$9,009.00

# **SUMMARY**

Legal Services Other Charges	\$66,846.00 \$1,529.11
TOTAL DUE	\$68,375.11

# Case: 1:18-cv-05587 Document #: 885-1 Filed: 11/30/20 Page 125 of 190 PageID #:19385 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

TEL (312) 733-3950 FAX (312) 733-3952

November 24, 2020

Kevin B. Duff, Receiver c/o Rachlis Duff & Peel, LLC 542 S. Dearborn Street, Suite 900 Chicago, IL 60605

Re: SEC v. EquityBuild Inc., EquityBuild Finance, LLC, Jerome H. Cohen, and Shaun D. Cohen
No. 18-cv-5587, US Dist. Ct., Northern Dist. of Illinois, Eastern Div.

Fed. I.D. No. 61-1421786 Invoice No.6622126

Legal Fees for the period September 2020 \$121,998.00

Expenses Disbursed \$3,267.03

Due this Invoice \$125,265.03

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	Description		
Accounting/Auditing					
9/3/2020	KMP	0.40	Review and reconcile Receivership Estate accounts on platform.	bank's online	
			Accounting/Auditing		
9/4/2020	KMP	1.30	Prepare financial schedules for Receiver's accounts for	July 2020.	
			Accounting/Auditing		
9/8/2020	KMP	2.70	Review online banking platform to verify balances of led accounts (.3); prepare financial schedules for Receiver 2020 (1.7); review July and August 2020 bank statement accounts (.7).	's accounts for	August
			Accounting/Auditing		
9/17/2020	KMP	0.50	Review and annotate funds request from property mana expenses and communicate with K. Duff and E. Duff re		
			Accounting/Auditing		
9/23/2020	KMP	0.30	Review and reconcile accounts in bank's online platform	n.	
			Accounting/Auditing		
9/25/2020	KMP	1.60	Further work on schedules of receipts and disbursement and forward same to E. Duff for review.	nts for July and	d August
			Accounting/Auditing		
9/28/2020	KMP	0.40	Review online bank records to confirm transfers to and operating account and property accounts pursuant to corestoration motion and communicate with K. Duff regard record transfers to account ledger (.2).	ourt order on	
			Accounting/Auditing		
9/29/2020	KMP	0.20	Record funds transfers to account ledger.		
			Accounting/Auditing		
9/30/2020	KMP	0.20	Review online banking information to verify receipt of p properties and communicate with K. Duff and J. Rak re-	roceeds from s garding same.	sales of
			Accounting/Auditing		
SUBTOTAL:				7.60	1064.00]
Asset Analysis & Re	covery	<u>′</u> _			
9/3/2020	AEP	1.00	Teleconference with government representative.		

Asset Analysis & Recovery

<u>Da</u>	ate	<u>Indiv</u>	<u>Hours</u>	Description	
9/	3/2020	MR	1.40	Participate in meeting with government representatives.	
				Asset Analysis & Recovery	
9/8	8/2020	AW	0.30	Finalize and serve notice of third party subpoenas.	
				Asset Analysis & Recovery	
9/	/11/2020	KMP		Review correspondence from attorney regarding unclaimed property, research same and communicate with K. Duff regarding same.	
				Asset Analysis & Recovery	
SUBTOTAL	_:			[ 2.90	1006.00]

#### **Asset Disposition**

9/1/2020 JR

7.20 Review email from property management regarding status of closings and respond accordingly (.1); follow up correspondence with A. Watychowicz regarding request to provide property information and motions filed related to lender objections (.2); perform search regarding same and draft a spreadsheet regarding same (1.5); review email from real estate broker regarding due diligence documents related to single family homes and exchange communications regarding same (.3); exchange correspondence with the buyer's counsel related to request for buyer information in anticipation of closing (.2); draft preliminary closing documents in preparation for closing (7508 S. Essex) (2.3); prepare preliminary closing documents for property (3074 Cheltenham) (2.6).

**Asset Disposition** 

AEP

2.70 Begin reviewing all e-mail correspondence relating to receivership properties (6250 S Mozart and 1131 E 79th), review EquityBuild files, and prepare responses to inquiries regarding taxes and lien issue (1.5); review purchase and sale contract received in connection with receivership property (2800 E 81st), check status of buyer entity, prepare contract for counter-initialing and signature, and update portfolio spreadsheet with relevant details (.2); prepare incoming wire instructions and send same, along with fully-executed contract for sale of receivership property (2800 E 81st) to buyer's counsel (.1); transmit SJO instructions and earnest money information to title company in connection with potential sale of receivership property (2800 E 81st) to title company (.1); communications with counsel for purchaser of receivership property (7953 S Marquette) regarding identity of nominee, check Illinois Secretary of State records to confirm existence of acquiring entity, update closing checklist and portfolio spreadsheet accordingly, and request revised title commitment (.2); review corporate documentation submitted by prospective purchaser of receivership properties (7255 S Euclid and 6217 S Dorchester), modify corresponding contracts, and

transmit same to K. Duff for execution (.3); review files pertaining to single-family residence portfolio and prepare allocation of property inspection costs for insertion into May statements to be provided to institutional lenders (.3).

Asset Disposition

9/1/2020 AW

1.60 Communicate with J. Rak regarding issue relating to property sales, compile pleadings related to same, and email K. Duff complete set of pleadings.

**Asset Disposition** 

9/2/2020 JR

6.90 Exchange correspondence with property management requesting updated property rent roll information in anticipation of closings for various properties (.2); exchange correspondence with the utility manager requesting property manager to take photos of water reading required to process water application in anticipation of closing (5618 S. Martin Luther King) (.2); review various property rent rolls and update electronic files (.6); draft closing documents for property (7508 S. Essex) in preparation for closing (.4); update closing checklist (.3); draft closing documents for property (1700 Juneway) in anticipation of closing (2.6); update closing checklist regarding requested information related to same (.4); draft closing documents for property for closing (7953 S. Marquette) (1.9); update closing checklist regarding same (.2); review email from K. Duff and draft addendum to contract for property (638 S. Avers) (.1).

Asset Disposition

**AEP** 

3.70 Read and revise e-mails regarding nature and extent of claims asserted against receivership properties (6250 S Mozart and 1131 E 79th) (.4); communications with title company regarding status of earnest money deposit in connection with prospective sale of receivership property (4611 S Drexel) (.1); review files relating to EB fund and prepare e-mail memorandum for K. Duff outlining corporate structure of fund, all holding company subsidiaries, and all special purpose entities (1.2); prepare comprehensive memorandum detailing affiliate relationship between EquityBuild and portfolio for purpose of obtaining hold harmless indemnities against special exceptions on title commitments to receivership properties (7508 S Essex and 6356 S California) (1.4); continued research on potential avenues for deletion of remaining special exceptions to title commitments on receivership properties (7508 S Essex and 6356 S California) (.3); review judgment order associated with special exception on title commitment to receivership property (7508 S Essex) and prepare notes for discussion with corporation counsel (.1); inventory all purchase and sale contracts in most recent sales tranche and transmit copies of same to receivership brokers (.2).

**Asset Disposition** 

MR 1.60 Attention to various issues on objections to sales and emails regarding same.

#### <u>Date</u> <u>Indiv</u> <u>Hours</u> <u>Description</u>

9/3/2020 JR

7.40 Review requested rent roll received from the leasing manager, request correct information for various properties (.3); update property electronic files regarding same (.2); review email from buyer's counsel requesting updates to subsidy leases for property (4534 S. Calumet) (.1); exchange correspondence with property management regarding same (4534 S. Calumet) (.1); further correspondence with the leasing manager regarding missing property documentation relating to updates for various properties (.2); draft closing documents for property (7953 S. Marquette) in anticipation of closing (1.4); exchange correspondence with buyer's counsel requesting buyer information relating to same (.1); update closing checklist related to same (.2); review email from K. Duff related to property documents and update electronic files for various properties (.2); exchange correspondence with A. Porter regarding same (.1); follow up correspondence with the title company regarding status of water applications (.1); draft closing documents for property (6250 S. Mozart) (2.1); draft closing documents for property (5618 S. King) (2.3).

**Asset Disposition** 

AEP 0.80 Read response to appeal of denial of request for hold harmless letter in connection with receivership properties (7508 S Essex and 6356 S California), review and analyze documents included therewith, and prepare e-mail to title underwriters demanding deletion of all remaining special exceptions and issuance of revised title commitments.

**Asset Disposition** 

9/4/2020 JR

3.70 Review emails from the title company to water department regarding water applications in ready status (.1); update electronic files for various properties regarding same (7201 S. Constance, 7051 S. Bennett, 7201 S. Dorchester, 7952 S. Marquette, 2736 W. 64th, 6356 S. California) (.4); update closing checklists regarding same (.2); draft closing documents for property in anticipation of closing (6558 S. Vernon) (2.4); review email from the title company related to water statement in preparation for closing (3074 Cheltenham) (.1); review water account information related to same (3074 Cheltenham) (.3); exchange further correspondence with property management requesting water statements related to same (3074 Cheltenham) (.2).

**Asset Disposition** 

**AEP** 

1.90 Prepare detailed e-mail to former title insurer setting forth the basis for reconsideration of the denial of hold harmless indemnities in connection with receivership properties (6356 S California and 7508 S Essex) (.8); prepare detailed e-mail to counsel for institutional lender requesting assistance in deletion of special exceptions on title commitments associated with receivership property (6356 S California) (.4); prepare e-mail to corporation counsel requesting assistance with deletion of special exceptions on title commitment associated with receivership property (7508 S Essex) (.3); research City of Chicago legal portals and prepare e-mail inquiry providing general background and requesting production of certificates of compliance in connection with pending title exceptions associated with sale of receivership property (7508 S Essex) (.4).

9/8/2020 JR

7.50 Review email from property manager regarding new leases for various properties (.2); draft closing checklist for property (7840 S. Yates) (.2); review lease terms, security deposits, lessee and lessor information for property (7201 S. Constance) and update certified rent roll in anticipation of closing (.9); review lease terms, security deposits, lessee and lessor information for property (7201 S. Dorchester) and update certified rent roll in preparation of closing (1.0); review lease terms, security deposits, lessee and lessor information for property (7953 S. Marquette) and update certified rent roll in anticipation of closing (.6); review lease terms, security deposits, lessee and lessor information for property (7051 S. Bennett) and update certified rent roll in anticipation of closing (.8); review lease terms, security deposits, lessee and lessor information for property (6356 S. California) and update certified rent roll in anticipation of closing (.9); review lease terms, security deposits, lessee and lessor information for property (2736 W. 64th) and update certified rent roll in anticipation of closing (.8); review lease terms, security deposits, lessee and lessor information for property (3074 Cheltenham) and update certified rent roll in anticipation of closing (.6); review lease terms, security deposits, lessee and lessor information for property (6355 Talman) and update certified rent roll in anticipation of closing (.7); review lease terms, security deposits, lessee and lessor information for property (7508 S. Essex) and update certified rent roll in anticipation of closing (.7); exchange correspondence with property management requesting missing due diligence documents for properties (7840 S. Yates, 7201 S. Constance, 7201 S. Dorchester, 7953 S. Marquette, 7051 S. Bennett, 6356 S. California, 2736 W. 64th, 3074 Cheltenham, 6355 S. Talman, 7508 S. Essex) (.1).

#### **Asset Disposition**

AEP 0.60 Review and an

0.60 Review and analyze certificate of compliance letter received from the City of Chicago in connection with attempt to obtain deletion of special exceptions to title commitment associated with receivership property (7508 S Essex) (.1), forward same to title insurer with request for issuance of revised commitment (.1), and correspond at length with title underwriter regarding remaining title exceptions and obstacles to obtaining deletion of same (7508 S Essex) (.4).

#### **Asset Disposition**

9/9/2020 JR

3.90 Telephone conference with A. Porter related to status of sales of remainder of properties in ninth sales motion (1.0); review email from property management related to subsidy contracts for property (3074 Cheltenham) and respond regarding same (.1); review water balances and further correspondence with property manager regarding status of water balance (3074 Cheltenham) (.2); review email request from property management related to documents of record for property (4547 Calumet), perform web search and further correspondence related to same (4547 Calumet) (.2); review various property loan information, loan amounts and contact information related to various properties (1700 Juneway, 7201 S. Constance, 7201 S. Dorchester, 7953 S. Marquette, 7051 S. Bennett, 6356 S. California, 2736 W. 64th, 6355 S. Talman, 3074 Cheltenham, 7508 S. Essex, 5618 S. Martin Luther King, 6558 S. Vernon) (1.3); exchange correspondence with buyer's counsel requesting lender information for property (1700 Juneway) (.2); exchange correspondence with buyer's counsel regarding lender

requirements and information related to property (7201 Constance) (.2); further correspondence with buyer's counsel regarding same for property (6558 Vernon) (.1); further correspondence with buyer's counsel regarding same and related to properties (3074 Cheltenham, 1131 E. 79th and 6250 Mozart); further correspondence with buyer's counsel regarding same and related to properties (6355 Talman, 5618 S. Martin Luther King, 2736 W. 64th and 6356 S. California) (.3); exchange correspondence with buyer's counsel related to same and regarding property (7508 S. Essex) (.1); additional correspondence with buyer's counsel regarding same and related to property (7051 S. Bennett) (.1); further correspondence with buyer's counsel requesting same for property (7953 S. Marquette) (.1).

#### Asset Disposition

9/9/2020 JR

3.30 (Continued) Exchange correspondence with property management regarding water balance for property (3074 Cheltenham) (.3); review email responses regarding same and update closing documents and checklists related to all properties, loan information and loan amounts for properties (7840 S. Yates, 7201 S. Constance, 7201 S. Dorchester, 7953 S. Marquette, 7051 S. Bennett, 6356 S. California, 2736 W. 64th, 3074 Cheltenham, 6355 S. Talman, 7508 S. Essex) (1.9); review deposits of earnest money for all tenth tranche properties (.3); exchange communication with the title company regarding same (.4); further correspondence with the title company requesting updates to title commitments related to ninth motion properties, lender and loan amount information (.4).

#### **Asset Disposition**

**AEP** 

1.40 Prepare e-mail to corporation counsel regarding lien recorded against receivership property (7508 S Ellis) and requesting assistance in obtaining information regarding the same (.2); teleconference with J. Rak regarding current status of closing preparations for all properties in most recent two sales tranches and allocation of responsibility for remaining outstanding tasks (1.0); teleconference with counsel for prospective purchaser of receivership property (1422 E 81st) regarding timing of closing, lack of earnest money deposit, potential modifications to purchase and sale agreement, and production of due diligence materials (.2).

#### **Asset Disposition**

9/10/2020 JR

6.80 Review emails from various buyer's counsel for tranche 9 properties and update closing documents related to closing information (1.1); update closing checklists and update electronic folders with earnest money deposit information for various properties (.8); review email from K. Duff related to property (2736 W. 64th) tax payment (.2); confirm status of payment on treasurer site regarding same (2736 W. 64th) (.2); telephone call to the treasurer's office regarding same (2736 W. 64th) (.5); telephone call to the clerk's office regarding same (2736 W. 64th) (.4); telephone call with A. Porter regarding same (2736 W. 64th) (1.0); exchange further correspondence with K. Duff regarding same (2736 W. 64th) (.2); update property tax balances for all remaining EB properties (1.8); exchange correspondence with F. Duff regarding same (1); exchange correspondence with property manager regarding same and inquire on property income available funds related to payment of tax balances (.2);

exchange correspondence with property manager regarding same (.1); exchange correspondence with broker requesting buyer counsel contact information for property (4611 Drexel) (.1); follow up correspondence with buyer's counsel regarding due diligence documents (4611 Drexel) (.1).

**Asset Disposition** 

9/10/2020 JRW

1.30 Conference with K. Duff, M. Rachlis and A. Porter regarding Ninth motion to confirm sales and proposed order regarding same (.5); confer with A. Watychowicz regarding proposed order submitted with ninth motion to confirm sales (.1); revise proposed order and draft correspondence to court regarding entry of same (.7).

**Asset Disposition** 

AW 0.60 Prepare draft order approving ninth motion to approve sales and email J. Wine regarding same (.2); research and communicate with K. Duff regarding orders approving sale of properties (5450 S Indiana, 7749 S Yates)(.4).

**Asset Disposition** 

**AEP** 1.60 Teleconference with K. Duff, M. Rachlis, and J. Wine regarding scope of objections to ninth motion to confirm and preparation of proposed order partially granting same (.5); revise proposed order partially granting ninth motion to confirm sales and Tab A thereto (.4): e-mail communications with counsel for prospective purchaser of receivership property (2800 E 81st Street) regarding numerous issues, including appraisal-related inspection, due diligence production, anticipated closing date, and rent prorations (.2); revise proposed order partially granting ninth motion to confirm to include additional prefatory language (.2); communications with prospective purchaser of receivership property (4611 S Drexel) regarding due diligence production and identity of nominee (.1); communication with counsel for prospective purchaser of receivership property (3074 E Cheltenham) regarding status of approval of ninth motion and potential closing date (.1); communications with title company regarding identity of purchaser of receivership properties (6217 S Dorchester and 7255 S Euclid) and receipt of earnest monies in connection therewith (.1).

**Asset Disposition** 

MR 0.60 Attention to proposed order (.3); attention to issues on property (7109 Calumet) (.3).

**Asset Disposition** 

9/11/2020 JR

3.70 Review status of water cert applications for various properties subject to the ninth motion (.1); review email from buyer's counsel regarding requested information and request additional lender buyer information in preparation for closing (7201 Dorchester) (.2); update closing checklist related to buyer information (7201 S. Dorchester) (.2); follow up correspondence with A. Porter regarding buyer credits related to sale (7201 S. Dorchester) (.1); research electronic files and review email from property manager regarding past due water charges (3074 Cheltenham) and respond accordingly (.5); review email from title company related to construction loan request and respond accordingly (6250 S. Mozart); follow up

correspondence with buyer's counsel regarding same (6250 S. Mozart) (.1); exchange correspondence with A. Porter regarding confirmation of receipt of earnest money for property (2800 E. 81st) (.1); review earnest money deposits and update electronic files for remainder of tranche 9 properties (.8); review emails from property management regarding HAP agreements for properties (7508 S Essex and 3074 Cheltenham) (.7); exchange correspondence with property manager regarding same (7508 S Essex and 3074 Cheltenham) (.4); exchange correspondence with buyer's counsel regarding closing information in preparation for same (7201 Dorchester) (.1); follow up correspondence with property management regarding payment of property taxes for all EB properties with sufficient funds (.2).

Asset Disposition

9/11/2020 JRW

0.60 Work with A. Porter on order partially confirming sales (.2); finalize order and draft correspondence to court regarding same (.4).

**Asset Disposition** 

AEP

0.80 Request and review third party deposit authorization forms associated with properties under contract of sale (7255 S Euclid and 6217 S Dorchester) and forward same, as applicable, to buyer's counsel or title insurer (.2); read and respond to due diligence related e-mails from counsel for purchasers of receivership properties (4611 S Drexel, 7701 S Essex), review underlying documentation, and prepare e-mails to property managers regarding discrepancies in T-12 profit and loss statements (.6).

Asset Disposition

JR

2.10 Review title updates for properties subject to the 9th motion and exchange correspondence with the title company regarding missing items relating to title updates (1.3); follow up correspondence with property management regarding status of water reading and providing pictures of same (5618 MLK) (.1); follow up correspondence with title company regarding same (5618 MLK) (.1); follow up communication with buyer's counsel requesting buyer information in preparation for closing (6558 Vernon) (.2); draft water application and submit to the title company (1700 Juneway) (.4).

**Asset Disposition** 

MR 0.30 Review and comment on proposed order.

Asset Disposition

9/14/2020 JR

8.10 Review email from property management and update electronic files for property (3074 Cheltenham) (.2); review water applications and update electronic files for various properties subject to the ninth motion (.4); review surveys and exchange correspondence with the surveyor and request updates to surveys for various properties subject to the ninth motion (.8); exchange correspondence with the title company regarding grantee updates for various properties subject to the ninth motion (.2); follow up correspondence with buyer's counsel requesting lender information for property (7508 Essex) (.1); follow up correspondence with buyer's counsel

regarding nominee information for purchaser related to property (1700 Juneway) (.1); follow up correspondence with buyer's counsel requesting lender information and nominee information for purchaser related to property (7201 Dorchester) (.2); update closing checklists regarding same for various properties subject to the 9th motion (.6); draft closing checklists containing relevant information and pertaining to the purchase and sale agreement, property, buyer, seller, lender information for various properties (4533 S. Calumet) (.7), (7840 S. Yates (.7), (816 Marquette) (.7), (431 E. 42nd) (.4), (4611 S. Drexel) (.7), (2800 E 81st) (.6), (4750 S. Indiana) (.6), (1422 E. 81st) (.6), (7024 S. Paxton) (.5).

**Asset Disposition** 

9/14/2020 JRW 0.50 W

0.50 Work with K. Duff and M. Rachlis on orders granting ninth motion to confirm sales and preparation of tenth motion to confirm.

**Asset Disposition** 

AW 6.50 Work on reply in support of Receiver's motion to approve ninth sale motion.

**Asset Disposition** 

AEP 3.70 Review proposed order confirming ninth tranche of sales (.1); teleconference with K. Duff regarding lack of entry of order confirming sales of remaining two properties (6250 S Mozart and 1131 E 79th) (.2); prepare e-mail to counsel for all purchasers of property in ninth sales tranche regarding entry of confirmation order and scheduling of closings (.3); begin preparation of tenth motion to confirm sales, locating and inserting data pertaining to each property sale, including overview of bidder selection process, listing price, purchase price, identity of buyer, and anticipated brokerage commission (3.1).

Asset Disposition

MR 0.50 Conferences and follow up regarding order on ninth motion for approval of sales with K. Duff and J. Wine.

**Asset Disposition** 

9/15/2020 JR

1.70 Review email from property management regarding requested water reading information required by the City of Chicago for water application (5618 MLK) (.1); further communication with the title company regarding same (5618 MLK) (.1); review email from property management regarding status of closings (.1); further communication with property manager regarding same (.1); exchange correspondence with buyer's counsel regarding requested information for closing (6558 Vernon) (.2); telephone conference with A. Porter regarding preparation of upcoming closings subject to the ninth motion (.4); exchange correspondence with the title company regarding updates to title commitment for property (7201 S. Dorchester) (.1); follow up correspondence with buyer's counsel regarding requested information needed for closing (7201 S. Dorchester) (.1); review email from buyer's counsel and prepare requested rent rolls for various properties and provide

to buyer's counsel (.2); request information from property manager regarding same (.1); review expired water application status and submit water application for properties subject to the ninth motion (.2).

**Asset Disposition** 

9/15/2020 JRW

0.60 Prepare proposed orders granting remainder of ninth sales motion and second motion for restoration (.4); draft correspondence to court regarding same (.2).

**Asset Disposition** 

AW 3.10 Work on reply in support of Receiver's motion to approve ninth sale motion, finalize reply, file with the court, and serve as per service list.

**Asset Disposition** 

AEP 1.10 Update outstanding issues list for all properties in ninth sales tranche in preparation for resolution of final pre-closing issues (.6); teleconference with J. Rak regarding all outstanding issues requiring attention in connection with imminent scheduling of closings of receivership properties in ninth sales tranche (.5).

Asset Disposition

9/16/2020 AEP

0.20 Communicate with both counsel for affected purchasers and title scheduler regarding ninth motion to confirm sales and need to postpone closings of receivership properties (1131 E 79th and 6250 S Mozart).

Asset Disposition

JR 2.20 Review email from the surveying company and provide requested information for property (1700 Juneway) (.2); review email from buyer's counsel and request information for closing and updates to closing documents (6559 S. Talman) (.2); exchange correspondence with property management regarding payment of property taxes of all EB properties (.1); review email from property manager regarding tenant contact information and update electronic files for various properties (6356 S. California, 5618 S. King, 2736 W. 64th, 6357 S. Talman) (.2); exchange correspondence with buyer's counsel regarding same for various properties (6356 S. California, 5618 S. King, 2736 W. 64th, 6357 S. Talman) (.1); review emails for closing confirmation related to upcoming closings and update electronic property files (.4); exchange correspondence with property management notifying of closing (7957 S. Marquette) (.2); further communication with real estate brokers regarding same (.1); review email from buyer's counsel regarding updates to closing and update electronic files (7201 Dorchester) (.2); further communication with the title company and surveying company regarding same (.2); review email from buyer's counsel regarding buyer information in preparation for closing and update closing documents (6558 S. Vernon) (.1); further communication with the title company and surveying company regarding same (.2).

9/16/2020 JR

3.80 (Continued) Review email from buyer's counsel regarding buyer information in preparation for closing and update closing documents (6558 S. Vernon) (.1); further communication with the title company and surveying company regarding same (.2); review email correspondence from property manager related to requested closing documents for property (7953 S. Marquette) and update electronic files (.2); review updated title commitments and update electronic files for various properties (.2); draft water application for property (6558 S. Vernon) and forward to the title company for processing (.5); follow up correspondence with the title company regarding status of water applications for properties (1131 E. 79th and 5618 Martin Luther King) (.1); review email from collection manager regarding court order eviction status for upcoming closing (7953 S. Marquette) (.1); exchange correspondence with the property management team regarding closing confirmation of property (7051 S. Bennett) and request documents in preparation for closing (.2); review email from K. Duff related to request of 2nd quarter 2020 closed properties, draft same and provide K. Duff regarding same (.2); review and update lien waivers for brokers and property managers in anticipation of upcoming closings (7957 S. Marquette, 7051 S. Bennett, 1131 79th, 3074 Cheltenham and 6250 Mozart) (1.0); review and update closing documents for property in anticipation of closing (7957 S. Marguette) (.7); review requested surveys delivered for various properties and update electronic files (.3).

#### **Asset Disposition**

JR 1.40

1.40 (Continued) Exchange correspondence with buyer's counsel and provide updated title commitments and surveys for various properties in preparation for closing (.3); review requested property financial documents and rent rolls for various closings and update electronic files (.3); exchange correspondence with A. Porter requesting approval of lien waivers to property managers and real estate brokers (.2); draft tenant notice letter for property (7957 S. Marquette) and request approval from buyer's counsel regarding same (.3); draft notice to tenant letter for property (7051 S. Bennett) and request approval from buyer's counsel regarding same (.3).

#### Asset Disposition

9/17/2020 AEP

1.00 Teleconference with attorney for prospective purchaser of receivership property (7953 S Marquette) regarding title commitment (.2); consult owner's policy received by EquityBuild in connection with acquisition of receivership property (7953 S Marquette) and prepare e-mails to corporation counsel and title insurer seeking certificate of compliance or deletion of exception (.4); teleconference with attorney for prospective purchaser of receivership property (7953 S Marquette) regarding appearance of special exception relating to permanent injunction on prior owner's policies and potential resolution of obstacle to closing (.3); teleconference with receivership broker regarding status of closing preparations and potential assistance in connection therewith (.1).

9/17/2020 JR

2.20 Review email from the surveying company and provide updated information for survey (7957 S. Marquette) (.2); review email from buyer's counsel and provide requested information related to tenants in preparation for closing (7051 S. Bennett) (.2); review email from K. Duff related to purchaser's request for property (4611 S. Drexel) and provide requested information (.1); review and update notice to tenant draft letters requested by buyer's counsel for property (7957 S. Marquette) and provide updates to same (.2); review emailed closing confirmation for property and advise property management of same (3074 Cheltenham) (.2); review emailed survey for property (7957 S. Marquette) and provide updates regarding same (.1); review email from buyer's counsel regarding deletion of title exceptions on title (1700 Juneway) and forward same to A. Porter (.1); review email from A. Porter relating to payment of taxes and update K. Duff regarding same (.1); review surveys requested by surveyor with updated certified names for various properties and update electronic files (.7); exchange correspondence with property manager regarding security deposits for tenant (7051 Bennett) (.2); update electronic files regarding same (7051 Bennet) (.1).

#### **Asset Disposition**

JR 4.90 (Continued) Exchange correspondence with buyer's counsel for various properties subject to the 9th motion forwarding updated survey and title commitments (.3); review email from K. Duff regarding request to produce documents to buyer's lender (4611 S. Drexel) (.1) telephone communication with lender regarding same (4611 S. Drexel) (.1); further email communications producing requested information to buyer's lender relating to property (4611 S. Drexel) (.1); finalize notice to tenants in preparation for closing (7957 S. Marquette) (.6); forward same to property manager for signature (.1); review certified rent roll regarding same and request missing leases (7957 S. Marquette) (.3); prepare tax declaration form related to same (7957 S. Marquette) (.4); update closing figures related to same (7957 S. Marquette) (.4); update closing documents in preparation for signing and closing (7957 S. Marquette) (.4); update final closing documents in preparation for signing and closing (7051 S. Bennett) (1.3); update final closing documents in preparation for signing and closing (7957 S. Muskegon) (.8).

#### **Asset Disposition**

9/18/2020 AEP

5.10 Read, edit, and revise all closing documents and update closing checklist for receivership property (7953 S Marquette) (1.2); read, edit, and revise all closing documents and update closing checklist for receivership property (7051 S Bennett) (1.2); read, edit, and revise all closing documents and update closing checklist for receivership property (3074 E Cheltenham) (1.2); prepare seller's figures for closing of receivership property (3074 E Cheltenham) (.3); communications with title company regarding clearance of final special exception on title commitment for receivership property (7051 S Bennett) (.2); oversee closing document signing process with K. Duff and J. Rak and inventory all closing documents (.8); review order entered in administrative hearing in connection with former receivership property (8047 S Manistee) and forward same to purchaser with explanation (.2).

9/18/2020 JR

4.80 Work on closing documents with A. Porter and K. Duff related to properties in preparation for closing (3074 Cheltenham, 7051 S. Bennett and 7957 S. Muskegon) (2.9); review notices to tenants and lien waivers and forward to property management requesting signature (7051 S. Bennett and 3074 Cheltenham) (.2); exchange correspondence with property management regarding requested property information for closing (3074 Cheltenham) (.3); review same and update electronic files (3074 Cheltenham) (.2); review email from property manager and update electronic files related to closing (7051 S. Bennett) (.1); review email from property management requesting tax payment for property (3074 Cheltenham) (.1); review email correspondence with buyer and respond accordingly regarding previously closed property (7026 Cornell) (.2); exchange correspondence with buyer and forward administrative order for a previously sold property (7546 S. Saginaw) (.1); review additional administrative orders (6356 S. California, 7600 S. Kington, 7648 Saginaw and 5618 MLK) (.1); exchange correspondence with property management requesting payment of taxes for properties with sufficient funds (.1); exchange correspondence with property management requesting payment of taxes for properties with sufficient funds (.1); exchange correspondence with property management requesting execution of lien waiver for property (7957 S. Marquette) (.1); exchange correspondence with broker requesting execution of lien waivers in preparation for closings (3074 Cheltenham, 7051 S. Bennett and 7957 S. Marguette) (.1); exchange communication with K. Duff regarding draft receiver's deed requested by broker related to Houston property, prepare and forward to broker (1102 Bingham) (.2).

#### **Asset Disposition**

9/19/2020 AEP

2.70 Review updated title commitments and invoices for all properties in tenth sales tranche, research files for evidence of insurance over special exceptions, and create list of action items for purposes of securing either releases or hold harmless letters, and e-mail title underwriter regarding proposed plan for deleting special exceptions (2.5); review and analyze draft settlement statement for receivership property and transmit comments to title company (.2).

#### **Asset Disposition**

9/20/2020 JR

0.90 Review email from property manager related to lien waivers, notice to tenants and property management fees for properties (7051 S. Bennett and 3074 Cheltenham) and update electronic files regarding same (.2); exchange correspondence with K. Duff regarding same (3074 Cheltenham and 7051 S. Bennett) (.1); review email from A. Porter regarding productions of due diligence documents for various properties (1422 E. 68th, 2800 E. 81st, 4750 S. Indiana, 6217 S. Dorchester, 7255 S. Euclid and 7840 S. Yates) and prepare a response (.1); forward all due diligence documents to purchase and buyer's counsel related to various properties (1422 E. 68th, 4750 S. Indiana, 6217 S. Dorchester, 7255 S. Euclid and 7840 S. Yates (.5).

#### **Asset Disposition**

9/21/2020 AEP

3.10 Prepare default letter in connection with receivership property (2800 E 81st) following purchaser's failure to timely deliver all requisite earnest money deposit authorizations (.3); review amended survey for receivership property

(7957 S Marquette) and request final signature on same (.1); communications with purchaser's counsel and title underwriter regarding status of special exception associated with receivership property (7957 S Marquette) and closing prorations (.2); attend closing of sale of receivership property (7957 S Marquette) (2.5).

#### Asset Disposition

9/21/2020 JR

6.60 Exchange correspondence with the property management team requesting updates for closing (7957 S. Marquette) (.8); review requested documents and update certified rent roll regarding same (7957 S. Marquette) (.9); exchange further correspondence with the management team requesting additional information required for closing (7957 S. Marquette) (.2); review email from K. Pritchard regarding tax payments and provide requested information regarding same for all remaining properties in the EquityBuild Estate (.3); exchange correspondence with property management regarding status of property management fees (3074 Cheltenham and 7051 S. Bennett) (.1); exchange correspondence with A. Porter providing updates for closing (7957 S. Marquette) (.2); exchange correspondence with buyer (Z. Elman) requesting closed property documents (7026 Cornell) (.2); further correspondence with buyer providing requested due diligence documents for property (7024 Paxton) (.1); review email from the closing agent and provide requested closing documents (7957 S. Marguette) (.2); follow up correspondence with broker requesting lien waiver for closing (7957 S. Marguette) (.1); follow up correspondence with surveying company requesting update for closing (.1); attend closing (7957 S. Marquette) (3.1); provide updated due diligence to buyer (7957 S. Marquette (.1); update all parties of closed property (7957 S. Marquette) (.1); communication with buyer's counsel regarding scheduling of closings (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 Martin Luther King) (.1).

## **Asset Disposition**

JR 0.50 (Continued) Exchange correspondence with K. Duff regarding same (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 Martin Luther King) (.1); exchange correspondence with buyer regarding production of due diligence documents for property (7701 S. Essex) (.2); request property management for production of updated ledgers, rent rolls and delinquency reports in preparation for closing of various properties (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 Martin Luther King) (.2).

### **Asset Disposition**

9/22/2020 JR

4.60 Review email from executive assistant and provide requested management company information for buyer (7957 S. Marquette) (.1); review email from property management and request and provide requested closing details for upcoming closings (7051 S. Bennet and 3051 S. Cheltenham) (.6); review email from broker, provide requested closing documents (7957 S. Marquette) and request lien waivers for various properties (.1); review email from property management regarding requested documents for closing (3074 Cheltenham and 7051 S. Bennett) and update electronic files (.3); further review rent roll, delinquency report and update certified rent roll for closing (7051 S. Bennett) (.7); upload property manager lien waivers to electronic file (7051 S. Bennett and 3074 Cheltenham) (.2); follow up

correspondence with buyer's counsel regarding request to schedule closing (7201 S. Constance) (.1); telephone call with buyer's counsel regarding same (7201 S. Constance) (.2); draft assignment and assumption of leases for property in preparation for closing (7051 S. Bennett) (.3); telephone call with A. Porter relating to scheduling of closing (7201 S. Constance) (.1); further email correspondence with the title company regarding request to schedule of same (7201 S. Constance) (.1); review email from K. Duff and prepare a request to extend addendum related to property (638 Avers) (.1); review email from property management and provide requested closing documents (7957 S. Marquette) (.1); review rent roll, delinquency report, ledger and update certified rent roll for closing (3074 Cheltenham) (1.3); review closing confirmation for various properties (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 MLK) (.1); forward details of closing to brokers and property managers (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 MLK) (.2).

#### Asset Disposition

9/23/2020 JRW

0.50 Correspond with A. Porter regarding necessary amendment to order granting ninth motion to confirm sale to correct recording numbers (7051 S Bennett), send amended order and draft correspondence to counsel for institutional lender regarding amendment.

Asset Disposition

**AEP** 

8.10 Prepare e-mail to counsel for prospective purchaser of receivership property (7237 S Bennett) regarding inclusion of property in tenth motion to confirm sales and pre-closing walk-thru issues (.2); review settlement statements in connection with closing of sale of receivership property (7051 S Bennett) (.1); read responses from buyer's counsel and receivership brokers regarding request for credit in connection with receivership property (7237 S Bennett) and prepare replies thereto (.2); attend closing (7051 S Bennett) (3.5); prepare e-mails to counsel for purchaser of receivership properties (7237 S Bennett and 6558 S Vernon) requesting information regarding alleged damage to latter and providing closing information and litigation update with regarding the latter (.3); prepare and submit closing figures in connection with conveyance of receivership property (3074 E Cheltenham) (.3); communications with J. Wine regarding nature of administrative claims against receivership property (6558 S Vernon) (.1); review and update closing checklist for receivership property (5618 S King) to ensure preparedness for 10/29 closing (.3); review and update closing checklist for receivership property (6356 S California) to ensure preparedness for 10/29 closing (.3); (cont'd in next entry).

#### Asset Disposition

**AEP** 

(Cont'd from previous entry) Prepare e-mail to counsel for lender reminding of need for releases of encumbrances on receivership property (6356 S California) in advance of schedule 09/29 closing (.2); review and update closing checklist for receivership property (2736 W 64th) to ensure preparedness for 10/29 closing (.3); review and update closing checklist for receivership property (6355 S Talman) to ensure preparedness for 10/29 closing (.3); review and update closing checklist for receivership property (7201 S Constance) to ensure preparedness for 10/30 closing (.2); read detailed e-mail inquiries from purchaser's lender regarding special

exceptions and proposed revisions to title commitment on receivership property (4611 S Drexel), prepare e-mail to surveyor requesting modified legal description and amended certification information, prepare e-mails to property manager requesting various additional due diligence documentation, prepare e-mail to purchaser's lender answering questions regarding special exceptions and judicial process, and prepare e-mail to purchaser's counsel regarding repair and maintenance expenses (1.8).

#### Asset Disposition

9/23/2020 JR

5.60 Exchange communication with the property manager requesting updated required financial documents in preparation for closing (7051 S. Bennett) (.3): update certified rent roll in preparation for same and discuss with A. Porter (7051 S. Bennett) (.6); review email from collection manager regarding eviction order pertaining to tenant (7957 S. Marquette) (.1); forward same to buyer's counsel and buyer regarding property (7957 S. Marquette) (.1); review email from broker and provide requested earnest money deposits for properties (7201 Dorchester and 7255 Euclid) (.1); provide buyer with requested closing documents (7051 S Bennett) (.2); exchange correspondence with the surveying company requesting updated executed survey (.2); further correspondence with the property manager regarding updates to tenant's security deposit (7051 S. Bennett) (.3) attend closing (7051 S. Bennett) (2.8); exchange correspondence with K. Duff, K. Pritchard, broker and property management advising of closed property (7051 S. Bennett) (.2); exchange correspondence with property management requesting property documents for closing (3074 Cheltenham) (.1); update closing documents and update electronic files (7051 S. Bennett) (.6).

#### **Asset Disposition**

9/24/2020 AEP

7.40 Attend closing of sale of receivership property (3074 E Cheltenham) (3.2) and, during breaks, prepare closing documents and update closing checklists for properties being sold the following week (5618 S King, 6356 S California, 6355 S Talman, 2436 W 64th, and 7201 S Constance) (.8); teleconference with receivership broker regarding request for closing credit submitted by purchaser of receivership property (7237 S Bennett) (.2); read and respond to inquiry from counsel for prospective purchaser of receivership property (1700 W Juneway) regarding identification of special exceptions to title to be deleted at closing (.3); review e-mails from counsel for prospective purchaser of receivership property (7201 S Dorchester) regarding requests and prepare e-mail to K. Duff regarding factual background, current impasse, and strategy for resolving dispute with scheduled closing approaching (.5); prepare e-mail to title underwriter regarding restriction identified as special exception on title commitment for receivership property (7742 S Calumet) and request guidance regarding deletion of same (.2); prepare e-mail to all counsel for purchasers of properties in tenth sales tranche regarding status of receipt of due diligence documents and anticipated closing timeframe (.3); prepare email to counsel for intervenors and objectors to ninth motion to confirm regarding status update and prospective ruling date (.1); review litigation file pertaining to receivership property (7508 S Essex) and prepare e-mail to K. Duff and J. Wine regarding obstacles to closing associated with

compliance dismissal order (.4); (cont'd in next entry).

**Asset Disposition** 

9/24/2020 AEP

(Cont'd from previous entry) Research status of outstanding closing documents associated with remaining properties not yet scheduled for closing (6558 S Vernon and 1700 W Juneway) and prepare e-mail to J. Rak regarding status of water certificates (.1); prepare closing figures for receivership properties next scheduled for closing (5618 S King, 2736 W 64th, 6356 S California, and 6355 S Talman) and prepare e-mail to title underwriter regarding payment of 2019 taxes (1.0); prepare closing figures in connection with conveyance of receivership property (7201 S Constance) (.3).

**Asset Disposition** 

JR 4.20 Attend closing (3074 Cheltenham) (4.0); exchange correspondence with property management regarding updates for closing (7051 S. Bennett and 3074 Cheltenham) (.2).

**Asset Disposition** 

9/25/2020 AEP

6.20 Review all broker and property manager lien waivers associated with closings of following week's sales of receivership properties (5618 S King, 2736 W 64th, 6356 S California, 6355 S Talman, and 7201 S Constance) and authorize signature and notarization (.4); communications with counsel for prospective purchaser of receivership property (2800 E 81st) regarding designation of nominee and production of due diligence materials (.1); prepare e-mail to counsel for purchaser of receivership properties regarding final closing issues, including status of building code violations and title exceptions (.3); correspondence with management company and purchaser of receivership property (7957 S Marquette) regarding certified rent roll (.2); review commission statements received from cooperating broker in connection with sales of receivership properties (5618 S King, 2736 W 64th, 6356 S California, and 6355 S Talman) and prepare broker lien waivers for each (.4) and review first draft of settlement statements for each property (.3); prepare second draft of tenth motion to confirm sales, inserting additional paragraphs describing bidding history for each property and inserting references to all encumbrances to be deleted pursuant to judicial order (4.5).

**Asset Disposition** 

JR

6.50 Review email from K. Pritchard regarding closed properties and confirm same (7051 S. Bennett, 3074 Cheltenham, 5759 S. Marquette) related to property insurance (.1); review and update broker and property manager lien waivers for various properties (6356 S. California, 7201 S. Constance, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) (.6); exchange correspondence with A. Porter requesting final review of same (6356 S. California, 7201 S. Constance, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) in preparation for closing (.1); review email from property management team regarding updated financial documents in preparation for closing (6356 S. California, 7201 S. Constance, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) (.3); update draft notice to tenant letter and exchange correspondence with buyer's counsel requesting approval of same for properties (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) (1.2); finalize notice to tenant letters for properties

(6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) and exchange correspondence with property manager requesting execution (2.6); request property manager and broker to produce lien waivers for properties (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) (.4); review email from title company regarding closing documents and exchange correspondence with A. Porter regarding same related to upcoming closings (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) (.1); review email from buyer' counsel regarding requested subsidy information for property (1700 Juneway) in preparation for closing (.2); exchange correspondence with property management regarding same (1700 Juneway) (.2); review tax payments produced by property manager (.7).

Asset Disposition

9/26/2020 AEP

5.30 Proofread, edit, revise, and inventory all closing documents prepared in connection with conveyance of receivership property: (2736 W 64th) (1.2); (6355 S Talman) (1.1); (6356 S California) (.8); (6355 S Talman) (1.2); (7201 S Constance) (1.0).

Asset Disposition

9/27/2020 JR

3.10 Review updated property reports and update certified rent roll for property in preparation for closing (6356 California) (.9); follow up correspondence with leasing manager requesting missing leases for same (6356 S. California) (.1); review updated property reports and update certified rent roll for property in preparation for closing (5618 S King) (.9); review updated property reports and update certified rent roll for property in preparation for closing (6355 Talman) (.5); exchange correspondence with the leasing manager requesting lease for upcoming closing (6355 Talman) (.1); review updated property reports and update certified rent roll for property in preparation for closing (2736 W 64th) (.5); review email from real estate broker and update electronic files regarding fully executed lien waivers for upcoming closings (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) (.1).

**Asset Disposition** 

9/28/2020 JRW

1.00 Email exchange regarding publication notice (.1); exchange correspondence with A. Porter regarding all administrative and housing court proceedings against properties involved in 10th sales motion and related research regarding same (.9).

**Asset Disposition** 

**AEP** 

2.00 Meeting with K. Duff and J. Rak to finalize and overseeing execution of all closing-related documentation associated with next five sales of receivership property (5618 S King, 2736 W 64th, 6356 S California, 6355 S Talman, and 7201 S Constance).

9/28/2020 JR

5.30 Review email from property management and respond accordingly regarding tax payments of EquityBuild properties (.1); exchange communication with K. Duff regarding same and provide status of tax payments on various properties related to institutional lender (4611 S. Drexel, 6217 S. Dorchester, 7255 S. Euclid, 6250 S. Mozart, 7109 S. Calumet, 1131 E. 79th) (.2); follow up correspondence with the title company regarding status of water application (5618 S Martin Luther King) (.1); follow up correspondence with property management regarding requested documents for closing (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) (.1); exchange correspondence with property management requesting documents for closing of properties (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) (.5); final review and production of closing documents in preparation for execution by receiver (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) (1.7); work on execution of closing documents with K. Duff and A. Porter regarding same (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) (2.0); exchange correspondence with J. Wine and A. Porter regarding administrative order for property (7024 Paxton), update electronic files regarding same (.2); review email from buyer's counsel related to a request to produce rent rolls for upcoming closings (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) and respond regarding same (.2); review email from J. Wine and provide requested documents for closed properties (7110 Cornell and 7300 S. St. Lawrence) (.2).

**Asset Disposition** 

9/29/2020 JRW

0.90 Finish analysis of administrative orders and proceedings regarding properties in tenth sales motion.

**Asset Disposition** 

AEP

7.00 Attend closings of sales of four receivership properties (5618 S King, 2736 W 64th, 6356 S California, 6355 S Talman, and 7201 S Constance).

Asset Disposition

JR

7.60 Attend closings of properties (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) (7.0); update rent roll related to upcoming closing (7201 Constance) (.4); exchange correspondence with all parties regarding closing confirmations of all four properties (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) (.2).

Asset Disposition

9/30/2020 JR

6.20 Review property financial reporting in preparation for closing and update certified rent roll (1.1); attend closing (7201 Constance) (4.0); exchange correspondence with K. Duff and K. Pritchard regarding closed property (7201 S. Constance) (.1); exchange correspondence with property management and broker regarding (7201 S. Constance) same (.1); exchange correspondence with property management providing requested closing statements from closed properties (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK and 7201 S. Constance) (.1); exchange correspondence with K. Pritchard regarding net proceeds for properties (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK and 7201 S. Constance) (.1); exchange correspondence with K. Duff regarding post-reconciliation amounts for all closed properties (.1); follow up

correspondence with property management regarding same (.1); exchange correspondence with property management requesting third quarter property tax payments (.2); review leases for previously sold property (7201 S. Constance) and follow up communication with leasing manager requesting missing lease (.2); exchange correspondence with buyer's counsel regarding same (7201 S. Constance) (.1).

**Asset Disposition** 

9/30/2020 MR 0.60 Attention to tenth motion for approval of sales and issues on same.

**Asset Disposition** 

SUBTOTAL: 219.90 48934.001

**Business Operations** 

9/1/2020 KMP 2.10 Review Receivership Estate account records and update spreadsheet

regarding types of available records and confer with K. Duff and A.

Watychowicz regarding same.

**Business Operations** 

JRW 0.20 Attention to discovery responses in litigation matter.

**Business Operations** 

AW 0.20 Communicate with K. Pritchard regarding available bank records.

**Business Operations** 

AEP 0.20 Review dismissal order and most recently received notice of violation for former receivership property (8209 S Ellis) and transmit same to purchasers

with explanation of events.

**Business Operations** 

9/2/2020 KMP 1.80 Review Receivership Estate account records and update spreadsheet

regarding types of available records, and confer with K. Duff regarding same.

**Business Operations** 

ED 1.90 Email correspondence with K. Duff and J. Wine (.3), insurance agent (.1), and insurance adjuster (.1) regarding insurance settlement (4520 S Drexel), and review of related documentation (.3); email correspondence with accountant to provide additional details necessary for preparation of May accounting reports (.2); review and analysis of financial reports from property manager regarding reconciliation of post-closing expense and income items relating to sold property (7749 S Yates) (.6) and telephone conference with

K. Duff and J. Wine regarding same (.3).

**Business Operations** 

Date	Indiv	Hours	Description

9/2/2020 JRW 0.30 Exchange correspondence with K. Duff and E. Duff regarding insurance claim (4520 S. Drexel) (.1); telephone conference with K. Duff and E. Duff

regarding financial statements and accounts payable to property manager (.2).

**Business Operations** 

AW 0.80 Attention to communication from vendor and communicate about same with counsel (.1); research regarding property incident (4520 S Drexel) and

communicate with K. Duff regarding same (.7).

**Business Operations** 

9/3/2020 JRW 0.30 Exchange correspondence with E. Duff and property manager regarding

accounts payable and related communication regarding fine paid in

resolution of administrative hearing (7749 S Yates).

**Business Operations** 

9/4/2020 JR 1.00 Review email from K. Duff and research tax information for various properties

(.3); telephone call to the Cook County Treasurer's office and Cook County

Clerk's office regarding tax balances (.7).

**Business Operations** 

9/8/2020 ED 0.60 Email correspondence with accountant regarding additional financial reporting

from property managers needed for preparation of May accounting reports (.2), review of related documents received from property manager and email

correspondence regarding same (.3); email correspondence with K. Duff regarding business operations issue (.1).

Business Operations

JRW 1.50 Correspondence with counsel and K. Duff regarding settlement of litigation

matter (.2); review lien notice, research judgment orders entered against property (7024 S. Paxton) and related analysis to K. Duff and A. Porter (.4); correspondence with property manager regarding payment of judgment (7024 S Paxton) (.1), and related correspondence with

A. Porter and K. Duff regarding plan for resolution of same (7024 S Paxton)

(.2); confer with A. Porter and K. Duff regarding city violation notices (6327 S

Kenwood, 5001 S Drexel) and related factual research (.6).

**Business Operations** 

AW 0.20 Follow up with counsel regarding online platform (.1) communicate with

K. Duff regarding requested declarations (.1).

**Business Operations** 

<u>Date Indiv H</u>	lours Description
9/8/2020 MR	0.30 Attention to issues on settlement in state court matter (.1); attention to issues on objections to restoration motion (.2).
	Business Operations
9/9/2020 ED	0.30 Email correspondence with accountant and property manager following up on missing financial reporting information for May 2020.
	Business Operations
JR	0.20 Review email from property management regarding payment of property taxes (816 Marquette) (.1); correspond with K. Duff related to payment of property tax (816 Marquette) (.1).
	Business Operations
MR	0.20 Further attention to issues on objections to restoration issues.
	Business Operations
9/10/2020 KMP	2.30 Review numerous pleadings and orders to locate record cites in connection with reply in support of motion for restoration, and communicate with K. Duff regarding same.
	Business Operations
AEP	0.90 Teleconference with J. Rak regarding property tax payment (2736 S California).
	Business Operations
9/11/2020 KMP	0.30 Review additional pleadings and orders to locate record cites in connection with reply in support of motion for restoration, and communicate with K. Duff regarding same.
	Business Operations
JRW	1.20 Telephone conference with A. Watychowicz regarding communication from database vendor (.1); exchange correspondence with City of Chicago law department regarding dismissal of respondents (5001 S Drexel) and related update to team (.2); telephone conference with collections counsel regarding lien filed against property (7024 S Paxton) and related preparation (.2); correspond with property manager regarding same (7024 S. Paxton) (.2); related correspondence to collections counsel regarding release of lien (.2); review continuation orders for administrative proceedings (6558 S Vernon, 7109 S Calumet, 7656 S Kingston) and update records and A. Porter regarding same (.3).
	Business Operations

<u>Date Indiv H</u>	lours Description
9/11/2020 AW	0.20 Revisions to reply in support of second restoration motion.
	Business Operations
AEP	0.70 Review and analyze dozens of continuance and judgment orders associated with former EquityBuild properties (5001 S Drexel and 6437 S Kenwood) and forward same to counsel for purchasers.
	Business Operations
MR	1.00 Further work to review and revise response on second restoration motion.
	Business Operations
9/14/2020 JR	0.20 Follow up correspondence with property management regarding available funds for payment of taxes of EquityBuild properties.
	Business Operations
9/15/2020 JRW	1.20 Exchange correspondence with city counsel regarding cancellation of hearing (6217 S. Dorchester) (.3); update A. Porter regarding administrative order (6217 S. Dorchester) (.1); revisions to release agreement and related correspondence with K. Duff and counsel (.4); exchange correspondence with A. Porter and K. Duff regarding housing court judgment (7508 S. Essex) and related review of complaint and interim orders (.4).
	Business Operations
9/16/2020 KMP	0.30 Work to submit payment of outstanding real estate taxes (638 N Avers) to Cook County Treasurer.
	Business Operations
ED	1.40 Review drafts of May accounting reports and related property manager financial reporting (1.2); correspondence with accountant and J. Rak regarding same (.2).
	Business Operations
JR	0.20 Review email from K. Pritchard regarding payment of property taxes (638 Avers) and provide requested information.
	Business Operations
9/17/2020 KMP	0.20 Further communications with K. Duff and J. Rak regarding outstanding real estate taxes for various properties in EB portfolio.
	Business Operations
JR	0.90 Review and update property tax balance reports for property management and provide requested information to K. Duff.
	Business Operations

9/18/2020 JRW

1.20 Prepare order partially granting second restoration motion (.6); draft cover email to court regarding order partially granting second restoration motion (.3); review administrative orders (5618 S. MLK, 6354 S. California, 7546 S Saginaw, 7600 S Kingston), update files and communicate with J. Rak and A. Porter regarding same (.3).

**Business Operations** 

AW 0.60 Communicate with K. Duff regarding cited opinion, research regarding same and email exchange with K. Duff regarding results.

**Business Operations** 

MR 0.30 Attention to restoration order and emails on same.

**Business Operations** 

9/20/2020 JRW 0.30 Exchange correspondence with A. Porter regarding status of administrative proceedings (4520 S Drexel, 7024 S Paxton, 431 E 42nd).

**Business Operations** 

**AEP** 3.60 Review and analyze administrative orders entered in numerous cases involving receivership properties (5955 S Sacramento, 7748 S Ellis, 7600 S Kingston, 431 E 42nd, and 7109 S Calumet) and update litigation spreadsheet (.6); read e-mails between counsel for buyer of receivership property (3074 E Cheltenham) and title underwriter regarding modifications to pro forma title policies, read language of requested endorsements, prepare e-mail to surveyor requesting modifications to survey to permit purchase of various title insurance endorsements, and prepare e-mail to counsel for buyer regarding special exceptions to be deleted at closing (.6); read e-mails from J. Wine regarding newly-received judgment orders in administrative actions filed against receivership property (7024 S Paxton), review files, including notice of recording and payment receipt and prepare response regarding status of releases (.2); read e-mail from prospective purchaser of receivership property (816 E Marquette) regarding building vacancies, review rent roll, and prepare e-mail to property manager requesting advance notice prior to acceptance of leases from prospective new tenants (.2); read e-mails regarding requested modifications to title commitment on receivership property (1700 W Juneway) and review and update closing checklist (.2); (cont'd in next entry).

**Business Operations** 

AEP (Cont'd from previous entry) Read e-mails from counsel for prospective purchaser of receivership properties (1131 E 79th and 6250 S Mozart) regarding deletion of title exceptions, review corresponding title commitments, and prepare response thereto (.7); review and analyze revised title commitment for receivership property (7201 S Constance), review status of closing documents, and update closing checklist (.2); review and analyze revised title commitment for receivership property (7051 S Bennett) and update closing checklist (.1); review and analyze recent orders issued in cases involving receivership properties still under contract (7109 S Calumet,

7600 S Kingston, 7656 S Kingston, 7237 S Bennett, 6558 S Vernon, and 5618 S King) and update closing checklists accordingly (.4); review revised surveys with updated certification information for all properties in ninth sales tranche and transmit requested changes to surveyor (.4).

**Business Operations** 

9/21/2020 KMP

1.80 Study court order relating to rent restoration and review bank records to identify account numbers for all properties subject to order (.8); confer with K. Duff regarding details of various transfers involved in restoration (.2); communicate with bank representatives requesting opening of new accounts in connection with same (.2); review follow-up request from property manager regarding outstanding water bills and prepare summary for K. Duff identifying requested amounts, cash on hand, and other expenses due on properties, and suggest plan of action (.4); communicate with property manager to provide instructions for achieving payment of same(.2).

**Business Operations** 

JRW 0.30 Communicate with A. Porter regarding lien (431 E. 42nd) (.1); email exchange with K. Duff and K. Pritchard regarding exhibit listing balance in fund (7760 S. Coles) (.2).

**Business Operations** 

9/22/2020 KMP

2.60 Additional communications with bank representatives regarding opening of new accounts in connection with anticipated account transfers to comply with restoration approved by court (.2); work on spreadsheets identifying accounts and transfer amounts in connection with same (2.1); review request from property manager regarding utility bills and communicate with K. Duff regarding same (.3).

**Business Operations** 

JRW 0.20 Review release of lien (7024 S Paxton) and related email exchange with A. Porter (.1); review notice of option to avoid hearing by submitting evidence of full compliance (7110 S Cornell)(.1).

**Business Operations** 

JR
1.90 Update property tax report for all EB properties (1.2); exchange correspondence with counsel regarding payment of taxes for properties (9610 Woodlawn, 310 E. 50th and 6807 S. Indiana) exchange correspondence with K. Duff regarding same (.3); review email from property manager and update electronic files for various properties with property tax receipts (.2); review email from E. Duff relating to review of monthly May reports and respond accordingly (.2).

**Business Operations** 

9/23/2020 ED

1.20 Review drafts of May accounting reports and related property manager financial reporting.

**Business Operations** 

9/23/2020 JRW

0.70 Research and correspondence regarding notice of violation (7546 S Saginaw) and subsequent orders in administrative proceedings, repairs performed by property manager and correspondence regarding additional repair estimates.

**Business Operations** 

9/24/2020 KMP

0.70 Communicate with K. Duff and bank representatives regarding logistics of inter-account transfers in connection with restoration (.3); communications with K. Duff and J. Rak regarding property manager's funds request for utility bills at various properties (.4).

**Business Operations** 

JRW

0.90 Pull together evidence and prepare certificate of completion for ordinance violations (7546 S. Saginaw) (.7); review settlement agreement and orders in EquityBuild matter (Foley) (.2).

**Business Operations** 

9/25/2020 KMP

1.00 Further work with bank representatives regarding logistics of inter-account transfers in connection with restoration and communications with K. Duff regarding same (.5); communicate with property manager regarding pending utility bills and property fund balances, and communicate with K. Duff, E. Duff and J. Rak regarding same (.3); confer with J. Rak to confirm information regarding closed sales of certain properties (7957 Marquette, 7051 Bennett, 3074 Cheltenham) and forward information relating to same to insurance broker (.2).

**Business Operations** 

**JRW** 

0.30 Correspondence from property manager regarding property repairs and inspection (7508 S Essex) and related report to team (.2); exchange correspondence with city attorney regarding settlement of administrative matter (7546 S. Saginaw) (.1).

**Business Operations** 

9/27/2020 JR

0.60 Review email from K. Duff regarding payment of property taxes and respond accordingly (.2); update reports and exchange communication with property management regarding request for payment of property taxes (1700 Juneway, 7201 Dorchester, 6250 S. Mozart, 1131 E. 79th, 7508 S. Essex, 6448 S. Vernon) (.4).

**Business Operations** 

9/28/2020 JRW

1.50 Exchange correspondence with property manager regarding payment of judgment (7546 S Saginaw) (.1); execute settlement agreement and forward with appearance to city attorney for pending administrative matter (7546 S Saginaw) (.6); work with A. Watychowicz on docketing upcoming housing court hearings (.1); correspondence with property manager regarding scheduling inspection of property (6217 S Dorchester) in advance of hearing (.2); correspondence with property manager regarding scheduling inspection

<u>Date Indiv H</u>	lours Description
	of properties (7201 S Constance, 7600 Kingston, 7237 S Bennett, 638 N. Avers) in advance of hearings (.3); exchange correspondence with J. Rak regarding evidence of sale closings for properties (7110 S Cornell, 7300 S St Lawrence and 7201 S Constance) in advance of hearings (.1); exchange correspondence regarding administrative order (7750 S Muskegon) (.1).
	Business Operations
9/28/2020 JR	0.20 Further correspondence with property management requesting payment of additional partial payments for property taxes of all remaining EquityBuild properties.
	Business Operations
9/29/2020 KMP	0.40 Prepare form for transfer of funds to financing company in payment of premium installment for property insurance and communicate with K. Duff

JRW 0.20 Confer with property manager regarding contact information for city property inspectors (.1); review compliance documentation from property manager regarding repairs and inspection (7508 S Essex) (.1).

**Business Operations** 

**Business Operations** 

SUBTOTAL: [43.60 10490.00]

and bank representatives regarding same.

Case Administration

9/15/2020 AW

9/11/2020 JRW 0.30 Attention to updating service list for proposed order.

Case Administration

AW 0.70 Attention to orders entered in administrative court, email J. Wine regarding same, and update docket (.3); attention to mail received by Defendant (.4).

Case Administration

9/14/2020 AW 0.30 Attention to entered orders approving Receiver's second rent restoration motion and ninth motion to approve sale (.1); email exchanges with counsel regarding entered orders (.1); communicate with J. Wine regarding draft order and email her approved draft of proposed order (.1).

Case Administration

1.20 Prepare pleadings and request Receivership website update (.7); communicate with K. Duff regarding deadlines and update docket (.3); update to claimants' service list and email J. Wine regarding same (.2).

Case Administration

Date Indiv Hours Description				
9/16/2020 AW	0.40 Prepare pleadings and request Receivership website update and revisions.			
	Case Administration			
9/23/2020 AW	0.70 Communicate with Judge Lee's courtroom deputy regarding participants in hearing (.1); prepare pleadings and request update to Receivership website (.6).			
	Case Administration			
9/29/2020 AW	0.40 Attention to transcripts and review same.			
	Case Administration			

Claims Administration & Objections

SUBTOTAL:

9/1/2020 KMP

3.10 Compile and review additional pleadings, transcripts, orders and other materials relating to claims related issue and forward same to K. Duff (2.7); review spreadsheet and documentation associated with claimant's request for additional information relating to property expenses and confer with K. Duff and J. Wine regarding same (8107 Ellis, 8214 Ingleside, 8000 Justine, 8209 Ellis)(.4).

[ 4.00

596.00]

Claims Administration & Objections

8.40 Exchange correspondence with K. Duff and K. Pritchard regarding claimant's counsel's request for documentation and related review of records from property manager regarding properties (8107 S Ellis, 8214 S Ingleside, 8000 S Justine, 8209 S Ellis) (.9); legal research regarding institutional lenders' objections to ninth motion to confirm sales (1131-41 E 79th, 6250 Mozart) (4.2); correspondence with A. Porter and K. Duff regarding claims issues (1131-41 E 79th) (.6); related review of supporting documents submitted by claimants (.7); correspondence with A. Porter and K. Duff regarding claim issue (6250 S. Mozart) (.6); work with A. Watychowicz regarding depiction of claimants by amount claimed (.3); correspondence with counsel for claimant regarding probate issues (.1); review judgment orders from collections counsel and related analysis to K. Duff and A. Porter) (.8); confer with K. Pritchard regarding no-collection letter for same (.2).

Claims Administration & Objections

AW 3.30 Response to claimant's inquiry (.1); continue and complete work on claims charts requested by Judge Lee (3.2).

Claims Administration & Objections

Date	<u>Indiv</u>	<u>Hours</u>	Description
9/1/2020	MR	0.40	Attention to objection and issues on ninth sales motion (6250 Mozart and 1131 E 79th).
			Claims Administration & Objections
9/2/2020	KMP	0.70	Review communications relating to spreadsheet associated with claimant's request for additional information regarding property expenses and confer with K. Duff regarding same.
			Claims Administration & Objections
	JRW	4.60	Work on reply to objections to ninth sales motion and related issues (1131 E 79th and 6250 S Mozart) (2.6); confer with A. Watychowicz regarding updates to master claims spreadsheet (.1); telephone conferences with K. Duff (.1) and A. Watychowicz (.1) regarding claimant; related exchange of correspondence with A. Porter regarding lawsuit regarding EquityBuild purchase of property (6556 S. Mozart) (.1); attention to claimant inquiry (.1); legal research regarding objections of claimants (1131 E 79th and 6250 S. Mozart) to ninth sales motion (1.5).
			Claims Administration & Objections
	AW	3.60	Email exchanges with counsel regarding proposed response to email from claimant (.1); review and updates to master claims sheet and database (3.3); close attention to claim entry issue and communicate with J. Wine regarding same (.2).
			Claims Administration & Objections
9/3/2020	JRW	2.80	Conference call with potential document vendor and counsel for institutional lenders (.6) and related review of revised proposal (.1); email exchange with potential document vendor regarding status (.1); exchange correspondence with K. Duff and A. Watychowicz regarding claimant allegations (.2); exchange correspondence with counsel for claimant (.1); legal research for response to objections to ninth motion to confirm sale (1.4); confer with claims vendor and A. Watychowicz regarding access to documents and revisions made in database (.3).
			Claims Administration & Objections
	AW	0.50	Research regarding claimants' rollovers and report to K. Duff and J. Wine regarding same (.4); communicate with vendor regarding update to claims database (.1).
			Claims Administration & Objections

Date	Indiv H	ours Description
9/4/2020	JRW	2.30 Drafting of response to objections to ninth motion to confirm sale (2.0); exchange correspondence with K. Duff regarding response to collections attorney regarding judgment orders and related analysis of claims against property (431 E 42nd) (.3).
		Claims Administration & Objections
	AW	0.50 Communicate with K. Duff on his response to claimant (.1); call and message for claimant's representative and follow up with same (.1); research and communicate with K. Duff regarding production of records (.3).
		Claims Administration & Objections
	MR	0.30 Attention to claimants' counsel's request for records.
		Claims Administration & Objections
9/7/2020	JRW	1.80 Draft response to objections to Ninth Motion to confirm sales (1131-41 E79th and 6250 S Mozart).
		Claims Administration & Objections
	MR	1.80 Attention to issues on objections and follow up on standard discovery related items.
		Claims Administration & Objections
9/8/2020	JRW	3.10 Attention to responding to claimant inquiry (.3); review fund documentation (.3); review revisions to draft confidentiality order from claimant's counsel and related internal correspondence (.5); review proposed revisions from claimant's counsel to standard discovery requests to investors, further revise same, and related internal correspondence (.8); review proposed revisions from counsel to standard discovery requests to institutional lenders, further revise same, and related internal correspondence (.4); research regarding claims submitted by claimants and related analysis to K. Duff and A. Watychowicz (.8).
		Claims Administration & Objections
	AW	0.60 Confer with K. Duff regarding response to claimant question regarding fund (.1); attention to voicemails left by claimant, draft response, and respond to same (.2); review claims of claimant and his spouse and communicate with J. Wine and K. Duff regarding same (.2); attention to email from regarding information provided and communicate with counsel regarding same (.1).
		Claims Administration & Objections
9/9/2020	JRW	3.00 Review objections to ninth sales motion and related communications regarding properties at issue and proposed order regarding unobjected to properties (.7); confer with M. Rachlis regarding standard discovery (.1) and

response to objections (.1); additional revisions to standard discovery requests and related correspondence to institutional lenders' counsel (1.1); attention to claimant inquiries (.1); review revised draft response to objections to ninth sales motion (1131 E 79th, 6250 S Mozart) (.9).

Claims Administration & Objections

9/9/2020 AW

0.90 Review and respond to claimant email (.1); update claimant's information as per request of his former counsel (.1); follow up regarding response to claimant (.1); research pleadings as per K. Duff request and report regarding same (.6).

Claims Administration & Objections

MR 6.10 Work to review draft response to objections to ninth sales motion (1131 E 79th, 6250 Mozart) (5.4); attention to issues regarding order on disposition of assets not objected to (.3); attention to standard discovery issues with J. Wine (.1); attention to motion for turnover (7110 Cornell, 6751 Merrill) (.3).

Claims Administration & Objections

9/10/2020 JRW

7.70 Attention to responding to claimant inquiry (.1); review claimant's motion to determine priority (7710 S Cornell, 6751 S Merrill) (.4); study fund documents and related proofs of claim (1.4); review draft response to objections (5450 S Indiana and 7749-59 S Yates) (.6); draft declaration in support of response to objections (1131 E 79th, 6250 S Mozart) (1.0); review comments and further revision of draft response to objections regarding ninth motion to confirm cales (1131 E 79th, 6250 S Mozart) (3.4); study correspondence from SEC (.1); conference with claimants' counsel and potential e-discovery vendor regarding proposal (.7).

Claims Administration & Objections

AW 3.00 Communicate with counsel about and respond to email from claimant (.2); review claims and work on updates to master claims sheet (2.7); follow up regarding response to claimant (.1).

Claims Administration & Objections

MR 6.30 Continue work on response brief and follow up regarding same with J. Wine; work and review supporting affidavit (1131 E 79th, 6250 Mozart) (5.4); conferences regarding same with K. Duff, A. Porter and J. Wine (1131 E 79th, 6250 Mozart) (.6); attention to turnover motion (7110 Cornell, 6751 Merrill) (.3)

Claims Administration & Objections

9/11/2020 JRW

1.50 Edit draft response to objections to second rent restoration motion to incorporate comments (5450 Indiana, 7749-59 Yates) (.5); review inquiries from claimants regarding status of claims (.2); review correspondence from counsel for claimant (.1); telephone conference with claimant regarding

standard discovery (.1); review additional revisions to draft response to objections (6250 S Mozart and 1131-41 E 79th) (.4) and related communication with A. Watychowicz regarding finalization of same (.1); exchange correspondence with A. Porter regarding response to collections counsel (431 E. 42nd and 5955 Sacramento) (.1).

Claims Administration & Objections

9/11/2020 AW

1.40 Attention to voicemail from counsel for claimant and follow up with J. Wine and K. Duff regarding communications from same (.2); begin work on reply in support of Receiver's ninth motion to approve sale (1131 E 79th, 6250 Mozart) (.8); communicate with counsel regarding draft partial order regarding ninth motion to approve sales, prepare service list, and submit order to proposed order email (.4).

Claims Administration & Objections

MR 4.00 Further review and edits to brief relating to ninth sales motion and work on declaration (1131 E 79th, 6250 Mozart).

Claims Administration & Objections

9/12/2020 JRW

1.50 Review and revise draft response to objections to ninth motion to confirm Sales (1131 E 79th, 6250 Mozart).

Claims Administration & Objections

MR 2.40 Further work on the reply brief on ninth sales motion (1131 E 79th, 6250

Claims Administration & Objections

Mozart) and follow up regarding same.

9/13/2020 MR

3.80 Work and research on brief for ninth sales motion and related matters and several exchanges with K. Duff regarding same (1131 E 79th, 6250 Mozart).

Claims Administration & Objections

9/14/2020 JRW

4.80 Review and further revise new draft response to objections to ninth motion to confirm sales (1131 E 79th, 6250 Mozart) (1.5); legal research and related exchange with M. Rachlis (.6); revisions to declaration in support of motion (1131 E 79th, 6250 Mozart) (.1); review SEC reply supporting ninth motion to confirm sales (1131 E 79th, 6250 Mozart) (.3); legal research regarding cases cited in reply brief (1131 E 79th, 6250 Mozart) (.5); confer regarding entry of minute order and order partially granting ninth motion to confirm sales, and submission of orders granting remainder of motion (.4); draft correspondence to collections counsel regarding judgments (1.4).

Claims Administration & Objections

<u>Date</u> <u>Indiv</u> <u>Hours</u> <u>Description</u>

9/14/2020 AW

0.20 Attention to draft notice of receivership to counsel, proofread, and email J. Wine regarding revisions.

Claims Administration & Objections

MR 2.00 Further work on reply to confirm sales and various exchanges regarding same, and further work on brief and affidavits and issues on orders (1131 E 79th, 6250 Mozart).

Claims Administration & Objections

9/15/2020 JRW

0.80 Telephone conference with M. Rachlis regarding email exchanges with claimant's counsel and courtroom deputy (.2); attention to finalizing responses to objections to ninth sales motion (6250 S Mozart and 1131-41 E 79th) and objections to second restoration motion (5450 S Indiana and 7749 S. Yates) (.6).

Claims Administration & Objections

AW 1.40 Respond via email to voicemails and request emails from claimants (.5); revise proposed order and exhibit regarding rent restoration motion and email J. Wine regarding same (.1); revisions to reply in support of second restoration motion, finalize reply, file with the court, and serve as per service list (5450 Indiana, 7749-59 Yates) (.8).

Claims Administration & Objections

MR 2.00 Further review of reply to objections to ninth sales motion (1131 E 79th, 6250 Mozart) (.8); attention to draft orders (.2); attention to information for upcoming hearing before Judge Lee (.3); further attention to reply on second restoration motion (.7).

Claims Administration & Objections

9/16/2020 JRW

3.80 Attention to claimant inquiries (.4); continue working with A. Watychowicz on chart depicting breakdown of claims (1.1); correspond with K. Duff regarding correspondence from counsel for claimant and related analysis of claims (1131-41 E 79th) (.6); further revise draft confidentiality order and related analysis to M. Rachlis (.2); further revise draft standard discovery requests and related correspondence regarding comments regarding same (.3); analysis of claims against properties (4520 S Drexel and 1131-41 E 79th) and funds/LLCs and related correspondence to K. Duff regarding grouping of claims against these properties by claims vendor (1.2).

Claims Administration & Objections

AW 4.10 Review submitted claims and respond to email inquiries from claimants (.6); responses to emails from claimant (.2); update claimant's contact information per his request and notify claims vendor regarding same (.1); continue work on charts relating to claims for Judge Lee, confer with J. Wine regarding claims, and email exchange with J. Wine regarding proposed revised charts (2.6); prepare draft notice of receivership to creditor, revise, and serve on creditor (.6).

Claims Administration Objections

9/16/2020 MR

0.30 Attention to claim related issues regarding upcoming hearing and materials regarding same.

Claims Administration & Objections

9/17/2020 JRW

4.00 Continue working with A. Watychowicz on charts depicting claims and description of same (1.2); related email and telephone communications with SEC, K. Duff and M. Rachlis (.4); telephone conference with SEC (.4); review claims submitted by claimant (.2); confer with K. Duff regarding pending priority motion and claims against properties (7110 S Cornell and 6751 S Merrill) (.4); review accounting report for properties (7110 S Cornell and 6751 S Merrill) and related correspondence to K. Duff and E. Duff (.3); revise standard discovery requests (.4) and related telephone conference with M. Rachlis (.4); revise confidentiality order (.3).

Claims Administration & Objections

AW 3.40 Review submitted claims and respond to email inquiries from claimants (.2); continue work on charts relating to claims for Judge Lee and communications with J. Wine regarding same (1.4); communicate with counsel regarding responses from claimants (.1); communicate with K. Duff and J. Wine regarding update to spreadsheet regarding properties (7110 S Cornell and 6751 S Merrill) and start working on the project (1.7).

Claims Administration & Objections

MR 2.00 Discussions on claims charts with J. Wine and K. Duff (.4); review materials regarding same (.6); attention to standard discovery issues (.5); work on same with J. Wine (.4); attention to confidentiality issues and conferences regarding same (.1).

Claims Administration & Objections

9/18/2020 JRW

2.90 Confer with M. Rachlis (.2) and A. Watychowicz (.3) regarding analysis of claims breakdown; related revisions to and correspondence regarding same (.9); confer with A. Watychowicz regarding analysis of fund claims to properties (.3); attention to claimant inquiry (.1); review proof of claim and related email to team (6801 S East End) (.4); correspond with K. Duff regarding claims against properties (7110 S Cornell and 6751 S Merrill) (.2); attention to claimant inquiry regarding status of property sale (1102 Bingham) (.1); revisions to standard discovery requests and related correspondence to counsel regarding same (.3); revise draft confidentiality order to address comments from claimant's counsel (.1).

#### <u>Date</u> <u>Indiv</u> <u>Hours</u> <u>Description</u>

9/18/2020 AW

4.10 Research and communicate with J. Wine about claimant (.3); communicate with J. Wine regarding claimant and his counsel's request (.1); email J. Wine regarding spreadsheet related to second restoration motion (.1); finalize exhibits for submission to proposed order email (.3); continue work on charts relating to claims for Judge Lee and communications with J. Wine regarding same (1.3); continue work on update to spreadsheet regarding properties (7110 S Cornell and 6751 S Merrill) (.8); research regarding claims issue and communicate with K. Duff and J. Wine regarding same (1.2).

Claims Administration & Objections

1.50 Attention to issues on charts requested by court regarding breakdown of claims and follow up regarding same (1.0); attention to standard discovery issues (.3); attention to motion for turnover (7110 Cornell, 6751 Merrill) (.2).

Claims Administration & Objections

9/21/2020 JRW

MR

4.70 Email exchange with SEC (.2); confer with K. Duff regarding analysis of claims by tranche (.2) and work with A. Watychowicz on same (.8); telephone conference with SEC (.3); telephone conference with claimant's counsel regarding claims vendor proposals (.3); related telephone conference with potential vendor (.1); analysis of sales proceeds and claims against properties and communications with K. Duff and M. Rachlis regarding same (2.6); confer with K. Duff and M. Rachlis regarding joint status report to the court regarding outstanding discovery matters (.1); related email to collections counsel (.1).

Claims Administration & Objections

ΑW

2.70 Continued research regarding claims issue discussed with K. Duff, communicate with J. Wine regarding same, and follow up with K. Duff about results (.6); prepare spreadsheet regarding claimant counsel information by properties (1.3); communicate with J. Wine regarding revisions to charts for Judge Lee and start preparing data for different tranches (.8).

Claims Administration & Objections

MR

2.50 Work on issues to review and edit of pie charts, discovery and joint status report (1.8); further prepare for upcoming hearing (.7).

Claims Administration & Objections

9/22/2020 JRW

7.50 Correspond with M. Rachlis and K. Duff regarding revisions to description of charts showing claims breakdown (.2); revise and finalize same (1.8); correspond with Judge Lee's clerk regarding claims charts (.2); review analysis from potential ediscovery vendor and related email to counsel (.1); exchange emails and revisions of draft standard discovery to investors, draft standard discovery to institutional lenders and draft confidentiality order (.3); extensive email exchanges and conferences regarding proposed revisions to standard discovery requests, confidentiality order, and related status report (4.5); exchange correspondence with counsel regarding joint

status report to court on discovery-related issues (.4).

Claims Administration & Objections

9/22/2020 AW

4.30 Communicate with K. Duff and J. Wine regarding emails from claimants (.2); review submitted claims and respond to email inquiries from claimants (.4); response to inquiry regarding listing of Houston property (1102 Bingham) (.1); communicate with J. Wine regarding revisions to charts for Judge Lee, apply requested revisions, and finalize charts (1.1); attention to narrative regarding charts and communicate with J. Wine regarding proposed revisions (.2); communicate with counsel regarding final revisions and prepare charts for Judge Lee, and file and serve as per service list (.6); attention to nearly finalized joint status report, communicate with counsel regarding final revisions, file with the Court, and serve as per service list (1.7).

Claims Administration & Objections

MR 8.50 Work on various submissions to the court regarding protective order, standard discovery, charts and various exchanges with K. Duff, J. Wine and A. Porter regarding same and preparation for upcoming hearing.

Claims Administration & Objections

9/23/2020 JRW

4.50 Attention to responding to claimant inquiries (.5); prepare for hearing on claims process and discovery issues and related telephone conference with K. Duff and M. Rachlis (1.5); appearance in telephonic hearing before Judge Lee (1.3); telephone conference with M. Rachlis and K. Duff regarding court's directives (.3); confer with A. Watychowicz regarding hearing update and preparation of status report regarding pending motions (.3) and prepare preliminary draft of same (.2); exchange correspondence with counsel for institutional lenders regarding meet and confer (.1); study correspondence from A. Porter regarding discovery requests and exchange emails regarding same (.2); review and revise draft email to claimants regarding investor claimant (.1).

Claims Administration & Objections

AW 1.00 Attention to emails from claimants in response to filed joint status report (.2); communicate with K. Duff and J. Wine regarding same, and respond to emails from claimants (.3); communicate with counsel regarding and response to email from investor claimant (.2); review spreadsheet and communicate K. Pritchard (.3).

Claims Administration & Objections

AEP 0.20 Review proposed discovery requests relating to standard discovery to institutional lenders and correspond with K. Duff, M. Rachlis, and J. Wine.

Claims Administration & Objections

MR 5.90 Prepare for upcoming hearing (2.2) and confer with J. Wine and K. Duff (1.8); participate in hearing (1.3); additional follow up on standard discovery issues for upcoming meetings (.3); attention to communications with claimant (.3).

9/24/2020 JRW

3.30 Exchange correspondence with A. Watychowicz and K. Duff regarding standard response to claimants' FAQ regarding draft discovery (.3); attention to response to claimant inquiries (.2); confer with M. Rachlis and A. Porter regarding standard discovery requests (1.5); work with M. Rachlis on revision of standard discovery requests (.8); draft email to claimants regarding circulation of contact information for claimant pursuant to court order (.4) and related exchange of revisions to same (.1).

Claims Administration & Objections

AW 2.40 Communications with K. Duff and J. Wine regarding joint status report inquiries and proposed update to claimants (.3); review submitted claims and respond to email inquiries from claimants regarding joint status report and update on claims process (.3); attention to email from claimant regarding her claim, and communicate with claims vendor regarding same (.3); communicate with J. Wine regarding filed claims (.1); prepare pending motion joint status report per court order and communicate with J. Wine regarding same (1.1); confer with K. Duff and J. Wine regarding communicating to all claimants' with claimant's information and revisions to transmittal email (.2); email exchange with counsel regarding issue with creditor (.1).

Claims Administration & Objections

AEP 1.90 Teleconference with M. Rachlis and J. Wine regarding formulation of standard discovery requests to institutional lenders.

Claims Administration & Objections

MR 4.80 Prepare for meetings on standard discovery (1.0); participate in meeting with J. Wine and A. Porter (1.9); further work on revisions to same (1.4); review and comment on email communication to claimants (.3); review court order regarding issues above (.2).

Claims Administration & Objections

9/25/2020 JRW

4.20 Revise standard discovery to institutional lenders and related email to counsel in advance of conference (.2); conference with counsel for institutional lenders, counsel for SEC and M. Rachlis (1.5); further work with M. Rachlis on standard discovery issues (.5); related correspondence with counsel for institutional lenders (.3) and with A. Watychowicz regarding process for discovery (.2); work with A. Watychowicz on investigation of and response to inquiry from claimant (.3); attention to additional claimant inquiries (.9); telephone conference with A. Watychowicz regarding processes for claims and discovery (.3).

9/25/2020 AW

3.30 Communicate with counsel regarding email to all claimants, prepare same, and serve requested email pursuant to court order (.4); responses to claimants' emails in response to notification regarding claimant's contact information that was shared pursuant to Court's order and joint status report (1.2); correspond with claimant regarding her not submitting claim, communicate with K. Duff regarding same, and communicate with potential claimant regarding bar date (.5); continue work on update to spreadsheet regarding properties (7110 S Cornell and 6751 S Merrill) (1.2).

Claims Administration & Objections

MR

7.00 Participate in conference regarding discovery (1.5); research regarding discovery and review discovery and work on various issues regarding same to further revise standard discovery (3.0); attention to motion for turnover and work on same (7110 Cornell, 6751 Merrill) (2.5).

Claims Administration & Objections

9/26/2020 MR

4.70 Further work on response to turnover motion and follow up with K. Duff regarding same (7110 Cornell, 6751 Merrill).

Claims Administration & Objections

9/28/2020 JRW

2.60 Confer with A. Watychowicz regarding logistics for providing discovery to claimants (.1); study and revise draft of joint motion to resolve discovery disputes (1.9); communicate with A. Watychowicz regarding claimant inquiries (.1); work with A. Watychowicz to prepare status report to court on pending motions and incorporate comments regarding same (.5).

Claims Administration & Objections

ΑW

3.10 Update claimant's contact info and correspond with claims vendor regarding same (.1); review claims and respond to update requests from claimants (.8); work with J. Wine on revisions to joint status report regarding pending motions (.8); complete work on update to spreadsheet regarding properties (7110 S Cornell and 6751 S Merrill) (1.4).

Claims Administration & Objections

9/29/2020 JRW

3.50 Continue revision to standard discovery requests to institutional lenders and investors (1.3); continued drafting and revision of position statement regarding standard discovery requests (.9); telephone conferences with M. Rachlis regarding discovery and joint motion (.7); review revision to standard discovery from institutional lenders and related correspondence to counsel (.3); additional revisions to joint update on pending motions and related discussions with K. Duff and M. Rachlis (.3).

<u>Da</u>	ate Ir	<u>ndiv</u>	Hours D	escription
9/2	29/2020	AW	1.60	Supplement spreadsheet regarding properties (7110 S Cornell and 6751 S Merrill) and communicate with counsel regarding same (1.2); continue work on revisions to joint status report regarding pending motions (.4).
				Claims Administration & Objections
		MR	4.10	Work on standard discovery issues and motion to resolve issues and follow up regarding same (3.0); conferences regarding discovery and joint motion with J. Wine (.7); attention to issues on joint report on pending motions (.4).
				Claims Administration & Objections
9/3	30/2020	JRW	V 3.60	Continued revision of and discussion regarding standard discovery requests and related correspondence with counsel for institutional lender claimants regarding same (2.1); exchange of correspondence with counsel for SEC (.3); telephone conference and exchange of correspondence with counsel for institutional lender claimants regarding joint report on pending motions (.2) and related communications with M. Rachlis and K. Duff regarding formulation of response to proposed additions and exchange of redline draft (1.0).
				Claims Administration & Objections
		MR	2.50	Attention to standard discovery related issues and various drafts and edits.
				Claims Administration & Objections
SUBTOTAL	.:			<del></del>
Status Repo	orts			
9/	18/2020	KMF	3.30	Begin work on exhibits for third quarter status report.
				Status Reports
9/2	25/2020	KMF	0.30	Prepare narrative regarding second motion for restoration and communicate with J. Wine regarding same.
				Status Reports
9/2	28/2020	KMF	P 0.20	Further communicate with J. Wine regarding issues relating to funds transfers to/from Receiver's account and property accounts pursuant to court order on restoration motion for upcoming status report.
				Status Reports
9/3	30/2020	KMF	P 4.20	Preparation of financial exhibits for 3Q2020 status report.
				Status Reports

<u>Date</u> Indiv	Hours Description	1	
SUBTOTAL:		00.8 ]	1120.00]
Tax Issues			
9/23/2020 KM		ax notices from stage agency and forward same to acco e as to response.	ountant
	Tax Issue	es	
9/29/2020 KM	1P 0.20 Forward f accounta	form 1099-S for sold property (7300 S St Lawrence) to ants.	
	Tax Issue	es	
SUBTOTAL:		[ 0.40	56.00]
		497.50	\$121,998.00

Other Charges			
	Description	_	
Business Operations			
	Photocopies for September 2020		133.40
	Court fees for state court action		617.85
	Online research for September 2020		2,153.28
	Software licenses (Google - \$96.00; InSynq - \$266.50)		362.50
SUBTOTAL:		[	3,267.03]
Total Other Charges			\$3,267.03

Summary of Activity

	,y		
	Hours	Rate	
Jodi Wine	102.90	260.00	\$26,754.00
Ania Watychowicz	63.20	140.00	\$8,848.00
Justyna Řak	137.90	140.00	\$19,306.00
Kathleen M. Pritchard	33.50	140.00	\$4,690.00
Andrew E. Porter	74.90	390.00	\$29,211.00
Ellen Duff	5.40	390.00	\$2,106.00
Michael Rachlis	79.70	390.00	\$31,083.00

#### **SUMMARY**

TOTAL DUE	\$125,265.03
Other Charges	\$3,267.03
Legal Services	\$121,998.00

# Exhibit H

### BrookWeiner L.L.C.

125 South Wacker Drive, 10th Floor Chicago, IL 60606-4497 312-629-0900

EQUITYBUILD INC RECEIVERSHIP C/O KEVIN DUFF 542 S DEARBORN, SUITE 900 CHICAGO, IL 60605 Invoice No.207683

Date 10/29/2020 Client No.BW10753

Services rendered in the month of July, 2020 per attached detail.

B. Fish 30.85 hours @ \$110 \$ 3,393.50

G. Castaldi 4.25 hours @ \$110 467.50

Current Amount Due \$ 4,933.50

Thank you.
We appreciate the opportunity to serve you.
Referrals are welcome.

PAYMENT DUE UPON RECEIPT

### Case: 1:18-cv-05587, DOC+1070031, #E&857 DUF HANG LEVERY BROWN 1379.01 190 PageID #:19430

001	7/21/2020								
		Castaldi	ACCTG	CWU	4235	Inventory listing and breakdown of return components for the 25 partnerships.	3.50	385.00	0.00
001	7/27/2020	Castaldi	ACCTG	CWU	4235	Inventory listing of partnership returns	0.75	82.50	0.00
001	7/7/2020	Fish	ACCTG	CWU	4200	revised statements per receivership	1.20	132.00	0.00
001	7/23/2020	Fish	ACCTG	CWU	4200	revising charges for 8100 S Essex	2.10	231.00	0.00
001	7/21/2020	Fish	ACCTG	CWU	4200	Create report for 8100 S. Essex for receivership	0.75	82.50	0.00
001	7/13/2020	Fish	ACCTG	CWU	4200	clear review items for March 2020 statements	2.50	275.00	0.00
001	7/14/2020	Fish	ACCTG	CWU	4200	working on April 2020 Reciever's report	7.50	825.00	0.00
001	7/17/2020	Fish	ACCTG	CWU	4200	entring data for April 2020 statements for receivership	5.50	605.00	0.00
001	7/16/2020	Fish	ACCTG	CWU	4200	working on entering data for April 2020 statements for recievership	4.80	528.00	0.00
001	7/15/2020	Fish	ACCTG	CWU	4200	entering April 2020 expenses for recivership reports	6.50	715.00	0.00
001	7/10/2020	Weinberg	TAX	1120	2380	Phone with J. Corbin at Miller Kaplan re: Receivership tax return	0.30	82.50	0.00
001	7/17/2020	Weinberg	TAX	1120	2380	Phone with K Duff re: 2017 partnership tax returns, Texas tax assessment & other tax matters	1.80	495.00	0.00
001	7/29/2020	Weinberg	TAX	1065	2105	Review of 2017 Partnership tax returns	1.40	385.00	0.00
001	7/30/2020	Weinberg	TAX	1120	2380	Phone & work with Terxas AG to get assessment removed	0.40	110.00	0.00
						_	39.00	4,933.50	0.00
						Invoice Reconciliation			
						Billed WIP Adjusted Progress Amount		4,933.50 0.00 0.00	
						Gross Amount (Apply Prior Progress) Sales Tax (Sales Tax Applied)		4,933.50 0.00 0.00 0.00	
						Net Invoice	<del></del>	4,933.50	

### BrookWeiner L.L.C.

125 South Wacker Drive, 10th Floor Chicago, IL 60606-4497 312-629-0900

EQUITYBUILD INC RECEIVERSHIP C/O KEVIN DUFF 542 S DEARBORN, SUITE 900 CHICAGO, IL 60605 Invoice No.207684

Date 10/29/2020 Client No.BW10753

Services rendered in the month of August, 2020 per attached detail.

B. Fish 19.45 hours @ \$110 \$ 2,139.50

G. Castaldi 2.25 hours @ \$110 247.50

Current Amount Due \$ 3,184.50

Thank you.
We appreciate the opportunity to serve you.
Referrals are welcome.

PAYMENT DUE UPON RECEIPT

### Case: 1:18-cv-05587, DOC+19700044#E&89576UEBARC AEVENIERABIN

ENG	DATE	EMPLOYEE	CAT	SUBCAT	SERVICE	MEMO	HOURS	BILLED	ADJUSTED
001 001	8/14/2020 8/10/2020	Castaldi Castaldi	TAX ACCTG	1065 CWU	2100 4235	Preparation of tax return Inventory schedule	0.50 0.25	55.00 27.50	0.00 0.00
001	8/13/2020	Castaldi	ACCTG	CWU	4235	Inventory Schedule	0.50	55.00	0.00
001	8/11/2020	Castaldi	ACCTG	CWU	4235	Update inventory sheet.	1.00	110.00	0.00
001	8/4/2020	Fish	ACCTG	CWU	4200	editing April 2020 statements to correct headding error	0.75	82.50	0.00
001	8/28/2020	Fish	ACCTG	CWU	4200	enter expenses for May 2020 for Receivership reports	2.50	275.00	0.00
001	8/27/2020	Fish	ACCTG	CWU	4200	entered May 2020 expenses for recievership reports	4.20	462.00	0.00
001	8/26/2020	Fish	ACCTG	CWU	4200	entered May 2020 expenses for receivership report	3.10	341.00	0.00
001	8/24/2020	Fish	ACCTG	CWU	4200	Entered expenses for May 2020 receivership report	1.00	110.00	0.00
001	8/25/2020	Fish	ACCTG	CWU	4200	Entered expenses for May 2020 receivership report	2.50	275.00	0.00
001	8/19/2020	Fish	ACCTG	CWU	4200	May 2020 reports working	1.20	132.00	0.00
001	8/20/2020	Fish	ACCTG	CWU	4200	on May's reports for recieviership	4.20	462.00	0.00
001	8/10/2020	Weinberg	TAX	1120	2380	Phone w/ K Duff re: review of 2017 partnership	1.20	330.00	0.00
001	8/12/2020	Weinberg	TAX	1120	2380	income tax returns. Prep & phone with K Duff re: 2017 Partnership returns	1.70	467.50	0.00
						_	24.60	3,184.50	0.00
						Invoice Reconciliation			
						Billed WIP		3,184.50	
						Adjusted		0.00	
						Progress Amount		0.00	
						Gross Amount		3,184.50	
						(Apply Prior Progress)		0.00	
						Sales Tax		0.00	
						(Sales Tax Applied)		0.00	
						Net Invoice		3,184.50	

### BrookWeiner L.L.C.

125 South Wacker Drive, 10th Floor Chicago, IL 60606-4497 312-629-0900

EQUITYBUILD INC RECEIVERSHIP C/O KEVIN DUFF 542 S DEARBORN, SUITE 900 CHICAGO, IL 60605 Invoice No.207685

Date 10/29/2020 Client No.BW10753

Services rendered in the month of September, 2020 per attached detail.

B. Fish 17.00 hours @ \$110

Current Amount Due \$ 1,870.00

Thank you.
We appreciate the opportunity to serve you.
Referrals are welcome.

PAYMENT DUE UPON RECEIPT

### 

ENG	DATE	EMPLOYEE	CAT	SUBCAT	SERVICE	MEMO	HOURS	BILLED	ADJUSTED
001	9/1/2020	Fish	ACCTG	CWU	4200	Entering expenses for May 2020 receivership	4.50	495.00	0.00
001	9/3/2020	Fish	ACCTG	CWU	4200	reports Entering May 2020 expneses for receivership	2.50	275.00	0.00
001	9/4/2020	Fish	ACCTG	CWU	4200	report Entering May 2020 expenses for receivership	3.50	385.00	0.00
001	9/8/2020	Fish	ACCTG	CWU	4200	reports Review May 2020 statements for Receivership	4.25	467.50	0.00
001	9/9/2020	Fish	ACCTG	CWU	4200	entering expenses and reviewing May 2020 reports	1.50	165.00	0.00
001	9/10/2020	Fish	ACCTG	CWU	4200	Review and upload files to receivership for May 2020	0.75	82.50	0.00
						_	17.00	1,870.00	0.00
						Invoice Reconciliation			
						Billed WIP Adjusted Progress Amount		1,870.00 0.00 0.00	
						Gross Amount (Apply Prior Progress) Sales Tax (Sales Tax Applied)		1,870.00 0.00 0.00 0.00	
						Net Invoice		1,870.00	

# Exhibit I



August 19, 2019

EquityBuild, Inc., et al. c/o Rachlis Duff Adler Peel & Kaplan, LLC Mr. Kevin Duff, Receiver 542 S Dearborn St, Ste 900 Chicago, IL 60605

> Invoice: 393067 Client: 601428.19

Professional services rendered through June 30, 2019:

DATE	SERVICE	STAFF	HOURS	AMOUNT
006/06/2019	1065 Preparation Compile income for SSPH Portfolio I	Miller, D	0.90	\$ 279.00
06/11/2019	1065 Preparation Compile income for SSDF5 Portfolio 1	Miller, D	0.75	232.50
06/11/2019	1065 Preparation Compile income for SSPH Portfolio 1	Miller, D	0.30	93.00
06/11/2019	1065 Preparation Compile income for EB South Chicago	Miller, D 3	0.40	124.00
06/11/2019	1065 Preparation	Miller, D	0.25	 77.50
	Compile income for EB South Chicago	4		806.00
		Courtesy	Discount	 (165.00)
		Curren	t Amount	\$ 641.00

# Our office has moved Please update your records with our new address

#### **DUE UPON RECEIPT**

Late fees applied on past due balances

Please include invoice number with remittance

Remittance Address:
640 Taylor Street, Suite 2200 Fort Worth, Texas 76102
wpbilling@whitleypenn.com 817.259.9798



August 19, 2019

EquityBuild, Inc., et al. c/o Rachlis Duff Adler Peel & Kaplan, LLC Mr. Kevin Duff, Receiver 542 S Dearborn St, Ste 900 Chicago, IL 60605

> Invoice: 393078 Client: 601428.19

Professional services rendered through July 31, 2019:

DATE	SERVICE	STAFF	HOURS		AMOUNT
07/02/2019	1065 Preparation	Karp	0.50	\$	222.50
	C - Donovan re open items list and m	nissing information			222.50
		Courtesy D	iscount	_	(45.50)
		Current A	Amount	\$	177.00

# Our office has moved Please update your records with our new address

#### **DUE UPON RECEIPT**

Late fees applied on past due balances

Please include invoice number with remittance

Remittance Address:
640 Taylor Street, Suite 2200 Fort Worth, Texas 76102
wpbilling@whitleypenn.com 817.259.9798



August 19, 2019

EquityBuild, Inc., et al. c/o Rachlis Duff Adler Peel & Kaplan, LLC Mr. Kevin Duff, Receiver 542 S Dearborn St, Ste 900 Chicago, IL 60605

> Invoice: 393099 Client: 601428.19

Professional services rendered through July 31, 2019:

DATE	SERVICE	STAFF	HOURS		AMOUNT
07/01/2019	Tax Consulting Review received documentation; updat for 2017 returns	Miller, D e open items list	1.55	\$	503.75
07/02/2019	Tax Consulting Teleconference with receiver to discuss and missing information	Miller, D s status of returns	0.50		162.50
07/02/2019	Tax Consulting Review existing documentation; update	Miller, D open items list	0.35		113.75
07/31/2019	Tax Consulting	Miller, D	0.25		81.25
	Email concerning open items; update p	rogress report for			
	Court				861.25
		Courtesy Dis	count	_	(176.25)
		Current Ar	mount	\$	685.00

## Our office has moved Please update your records with our new address

#### **DUE UPON RECEIPT**

Late fees applied on past due balances

Please include invoice number with remittance

Remittance Address:
640 Taylor Street, Suite 2200 Fort Worth, Texas 76102
wpbilling@whitleypenn.com 817.259.9798



September 24, 2019

EquityBuild, Inc., et al. c/o Rachlis Duff Adler Peel & Kaplan, LLC Mr. Kevin Duff, Receiver 542 S Dearborn St, Ste 900 Chicago, IL 60605

> Invoice: 394799 Client: 601428.19

Professional services rendered through August 31, 2019:

DATE	SERVICE	STAFF	HOURS	AMOUNT
08/01/2019	1065 Preparation Trial balances for 5001 Drexel, 4520 D 79th, 6217 Dorchester, 7255 Euclid, 63 SSPH Port 1, SSDF5 Port 1		3.15	\$ 1,023.75
08/03/2019	Tax Consulting Review documents from Porter law; re documents for properties	Miller, D view closing	0.90	292.50
08/04/2019	1065 Extension Trial balance for EB South Chicago 3	Miller, D	0.90	292.50
08/06/2019	1065 Preparation Trial balance for EB South Chicago 4, and SSDF5 Porfolio 1	Miller, D SSPH Portfolio 1	1.85	601.25
08/08/2019	1065 Preparation Trial balance for 6951 Merrill, 6250 Mc Euclid, 6217 Dorchester, 1139 E 79th, 4611 Drexel		2.95	958.75
08/09/2019	1065 Preparation Request additional informaiton for 113	Miller, D 1 E 79th	0.25	81.25
08/09/2019	Tax Consulting Review invoice detail and update line i per Reciever request	Miller, D tem descriptions	0.50	162.50
08/10/2019	1065 Preparation Trial balance for 4533 S Calumet	Miller, D	0.25	81.25
08/10/2019	Tax Consulting Compile LLC spreadsheet showing ler manager for each related property; rev missing items for tax returns		2.00	650.00

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Whitley Penn LLP EquityBuild, Inc., et al. Invoice No. 394799

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DATE	SERVICE	STAFF	HOURS	AMOUNT
08/12/2019	Bookkeeping Consulting Gathering of documents and sent to F	Griffith Receiver	0.75	97.50
08/30/2019	1065 Preparation	Miller, D	0.75	243.75
	Discuss loan and escrow balances wi	•	or	
	iodir and ocorow salanece from receiv	701		4,485.00
		Courtes	y Discount	(897.00)
		Curre	ent Amount	\$ 3,588.00

0 - 30	31- 60	61 - 90	91 - 120	Over 120	Balance
5,738.00	0.00	0.00	2,120.00	45,973.00	53,831.00

# Our office has moved Please update your records with our new address

#### **DUE UPON RECEIPT**

Late fees applied on past due balances

Please include invoice number with remittance



July 10, 2020

EquityBuild, Inc., et al. c/o Rachlis Duff Adler Peel & Kaplan, LLC Mr. Kevin Duff, Receiver 542 S Dearborn St, Ste 900 Chicago, IL 60605

> Invoice: 435158 Client: 601428.19

Professional services rendered in conjunction with engagement agreement:

Professional services related to preparation of U.S. Return of Partnership Income (Form 1065), including supplemental forms, schedules and disclosures and Forms Schedule K-1 for partners, calculation of temporary and permanent differences between book and taxable income, calculation of partner capital accounts, and allocation of partnership income, gain, loss, deduction and credits to partners for the following entities: (21 returns @ \$1,250 per return)

SSDF1 Holdco 1 LLC SSDF1 Holdco 2 LLC SSDF4 Holdco 1 LLC SSDF4 Holdco 2 LLC SSPH Portfolio 1 LLC SSDF4 Holdco 3 LLC SSDF5 Holdco 1 LLC South Side Development Fund 1 LLC South Side Development Fund 3 LLC South Side Development Fund 4 LLC SSDF3 Holdco 1 LLC SSDF3 Holdco 2 LLC SSPH Holdco 1 LLC 8809 S Wood Associates 11318 S Church St Associates South Side Development Fund 4 LLC 526 W 78th LLC 1516 E 85th Pl Associates 6759 S Indiana Associates 1401 W 109th Associates 6807 S Indiana Associates 4750 Indiana LLC SSDF3 Holdco 2 LLC SSPH Holdco 1 LLC

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Whitley Penn LLP EquityBuild, Inc., et al. Invoice No. 435158

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0 - 30	31- 60	61 - 90	91 - 120	Over 120	Balance
26,250.00	0.00	0.00	0.00	6,009.80	32,259.80

#### **DUE UPON RECEIPT**

Late fees applied on past due balances

Please include invoice number with remittance

Remittance Address:

640 Taylor Street, Suite 2200 Fort Worth, Texas 76102 wpbilling@whitleypenn.com 817.259.9798



August 26, 2020

EquityBuild, Inc., et al. c/o Rachlis Duff Adler Peel & Kaplan, LLC Mr. Kevin Duff, Receiver 542 S Dearborn St, Ste 900 Chicago, IL 60605

> Invoice: 441443 Client: 601428.19

Professional services rendered through August 15, 2020:

Professional services related to preparation of U.S. Return of Partnership Income (Form 1065) for 4755 S St Lawrence Association, including supplemental forms, schedules and disclosures and Forms Schedule K-1 for partners, calculation of temporary and permanent differences between book and taxable income, calculation of partner capital accounts, and allocation of partnership income, gain, loss, deduction and credits to partners.

Professional services related to preparation of 2016 U.S.
Corporation Income Tax Return for an S Corporation
(Form 1120S) for Equitybuild Inc., including supplemental forms, schedules, and disclosures and Form(s) Schedule K-1 for shareholders, calculation of temporary and permanent differences between book and taxable

income, calculation of Accumulated Adjustment Account (AAA) and other applicable corporation equity accounts, and allocation of corporation income, gain, loss, deduction and credits to shareholders.

Professional services related to preparation of 2017 U.S. Corporation Income Tax Return for an S Corporation (Form 1120S) for Equitybuild Inc., including supplemental forms, schedules, and disclosures and Form(s) Schedule K-1 for shareholders, calculation of temporary and permanent differences between book and taxable income, calculation of Accumulated Adjustment Account (AAA) and other applicable corporation equity accounts, and allocation of corporation income, gain, loss, deduction and credits to shareholders.

\$ 1,250.00

1,667.00

2,500.00

Current Amount \$ 5,417.00

Case: 1:18-cv-05587 Document #: 885-1 Filed: 11/30/20 Page 184 of 190 PageID #:19444

Whitley Penn LLP EquityBuild, Inc., et al. Invoice No. 441443

Page 2

#### **DUE UPON RECEIPT**

Late fees applied on past due balances

Please include invoice number with remittance



#### **REVISED**

August 19, 2019

EquityBuild, Inc., et al. c/o Rachlis Duff Adler Peel & Kaplan, LLC Mr. Kevin Duff, Receiver 542 S Dearborn St, Ste 900 Chicago, IL 60605

> Invoice: 393094-B Client: 601428.19

Professional services rendered through June 30, 2019:

DATE	SERVICE	STAFF	HOURS		AMOUNT
06/06/2019	Tax Consulting Check for Google docs access as requ	Miller, D uested by N. Mirjanic	0.35 h.	\$	86.80
06/11/2019	Tax Consulting Review closing documents for properti Quickbooks	Miller, D es; access	0.50		124.00
06/20/2019	Bookkeeping Consulting Research and respond to K. Pritchard request for payroll history	Christian-Sr at receiver's office	1.10		149.60
06/25/2019	Tax Consulting Discuss status of returns with J. Karp	Miller, D	0.25		62.00
06/26/2019	Bookkeeping Consulting Research history of payroll prep by WF payroll reports and payroll journals for (4Q 2017). Upload files and send to re email. Files too big-sent multiple email	each paycheck eceiver's office via	0.85		115.60
06/27/2019	Bookkeeping Consulting Respond to subsequent email from rec	Christian-Sr ceiver	0.25		34.00
06/27/2019	Tax Consulting Discuss missing items with J. Karp	Miller, D	0.35	_	86.80
		Current Ar	nount	\$	658.80

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#### **DUE UPON RECEIPT**

Late fees applied on past due balances

Please include invoice number with remittance

# Exhibit J



#### Remit to

Axos Fiduciary Services 7300 College Blvd. Suite 450 Overland Park KS. 66210

Bill-to INVOICE
Mr. Kevin Duff 135002

542 S Dearborn Street Suite 900 CHICAGO, IL 60605.

Transaction	135002	Line Total	128.75
Invoice Date	10/7/20	Sales Tax	0.00
Legal Entity	Axos Bank	Shipping	0.00
		Total	128.75
		Payments	0.00

Credits 0.00
Financial Charges 0.00

Payn	nent Terms	ns 30 Net Due Date 11/6/20 Balance			e Due \$128.75	
No.	Product	Description	UOM	Quantity	Unit Price	Amount
1 2		Equitybuild - Data Entry  Monthly Claims Extraction	Each Each	1.75 .5	45.00 100.00	78.75 50.00
					Line Total	128.75

#### Comments:

Please see the attached time card for details regarding all billable time.

Employee	Date	Time	Description
Joanna	27-Jul	0.5	Research Instance ID 174.
Joanna	28-Jul	0.25	Add emails to both Claim #1029 and claim #409
Joanna	4-Aug	0.5	Research Missing John McDevitt claims
Joanna	6-Aug	0.5	Enter 2090 and 2091 for John McDevitt & Captain Jack, LLC and attach documents
Joanna t	otal	1.75	
Employee	Date	Time	Description
<b>Employee</b> Cheryl	<b>Date</b> 4-Aug		<b>Description</b> Researching what client said was a missing claim
			'
Cheryl		0.5	'
Cheryl Cheryl		0.5 0	'
Cheryl Cheryl Cheryl		0.5 0	'

2.25

# Exhibit K



### **Invoice**

BILL TO		
EquityBuild Kevin Duff		

DATE	INVOICE#
10/8/2020	11893

TERMS	PROJECT

QUANTITY	SERVICED	DESCRIPTION	RATE	AMOUNT
0.75	7/10/2020	Uploaded several entries to different sections.	110.00	82.50
0.25	7/23/2020	Added item to website.	110.00	27.50
1	7/30/2020	Uploaded 9 PDF articles.	110.00	110.00
0.25	7/31/2020	Uploaded one pdf and article entry.	110.00	27.50
0.5	8/4/2020	Question about Dropbox spreadsheet. Had to recover and find Dropbox data.	110.00	55.00
2	8/25/2020	Looked over and answered questions from Julia regarding EB exports. Got onto EB computer and reviewed previous exported items to answer questions accurately.	110.00	220.00
1	8/27/2020	Ania called and asked if I can make sure connection with InSynq and TMO was still possible. Worked on this an wrote up instructions for Ania to connect. TMO was expired, but we were both able to connect to it.	110.00	110.00
1	8/31/2020	Uploaded several articles to EB website.	110.00	110.00
1	9/15/2020	Uploaded 6 DB articles and PDF.	110.00	110.00
0.25	9/16/2020	Updated 2 articles.	110.00	27.50
0.25	9/16/2020	Updated PDF for previous entry.	110.00	27.50
1	9/23/2020	Uploaded 7 items up to the website.	110.00	110.00
		Illinois Sales Tax	10.25%	0.00

**Total** \$1,017.50