

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

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

**RECEIVER’S TENTH 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 (Dkt. No. 16), as supplemented by Order entered March 14, 2019 (Dkt. No. 290) and Order entered February 21, 2020 (Dkt. No. 634) (collectively, the “Receivership Defendants”), and pursuant to the powers vested in him by Order of this Court, respectfully submits this Tenth Interim Application (“Application”) for the Fourth 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 Miller Kaplan Arase LLP (“Miller Kaplan”), 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. (Dkt. 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. §§77q(a)q. (Dkt. 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. (Dkt. 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. (Dkt. 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. (Dkt. No. 19) On August 23, 2018, the Receiver retained BrookWeiner to provide accounting services and to perform tax and related work regarding the assets of the Receivership Defendants, and Miller Kaplan to serve as Tax Administrator of the Settlement Fund (Dkt. No. 32). On August 28, 2018, the Court entered an Order approving BrookWeiner’s and Miller Kaplan’s rates. (Dkt. Nos. 39, 45) 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. (Dkt. 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. (Dkt. No. 16, ¶ 69)

## **II. TENTH INTERIM APPLICATION**

9. Pursuant to the Billing Instructions, the Receiver provides the following information regarding this Application:

---

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

a. The Application covers the period from October 1, 2020 through December 31, 2020.

b. The names and hourly rates of all professionals for RDP, BrookWeiner, and Miller Kaplan, as well as Axos' and Prometheus's hourly rates, are attached as **Exhibit A**.

c. This is the Receiver's Tenth 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 Fourth 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 December 31, 2020 was \$1,181,881.43. 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 Fourth 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 Fourth 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 losses in connection with a fire that had occurred in November 2019 at 638 N. Avers, for which an additional \$111,758.22 was received in the Fourth Quarter 2020.

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 were continued. The Receiver's counsel moved to set aside default judgments entered in four matters, appearing at an administrative hearing in one of these matters and obtaining a release of lien recorded against the property (4611 S. Drexel), and negotiating a settlement of the other three cases with corporation counsel (431 E 42nd Place). Counsel for the Receiver resolved two additional administrative matters by online submissions to the Department of Buildings, obtaining an order dismissing the EquityBuild entity from one case (1449 N. Talman) and a favorable settlement in the other matter (7546 S Saginaw). Counsel for the Receiver also worked with corporation counsel with regards to seven pending Department of Housing cases, and obtained three dismissals and four continuances. Additionally, during the quarter, the Receiver's counsel received numerous orders continuing hearings and three new notices of violations, and maintained its docket for all pending matters. As of December 31, 2020, there remained 17 known open City of Chicago matters involving code violations, including 4 pending City of Chicago municipal housing court matters, 11 pending City of Chicago administrative proceedings filed by the Buildings Department and 2 pending administrative proceeding filed by the Department of Sanitation.

ii. Property Sales

The Receiver and his retained professionals closed the sales of the following 15 Receivership properties during the Fourth Quarter 2020, generating aggregate net proceeds in the amount of \$13,896,003:

1. 6554-58 S. Vernon
2. 1700-08 W. Juneway
3. 7201-07 S. Dorchester
4. 7508 S. Essex
5. 431 E. 42nd
6. 7701-03 S. Essex

7. 7442-54 S. Calumet
8. 816-22 E. Marquette
9. 6949-59 S. Merrill
10. 4533-47 S. Calumet
11. 4315-19 S. Michigan
12. 7600-10 S. Kingston
13. 7656-58 S. Kingston
14. 1131-41 E 79th Place
15. 6250 S Mozart Street

Consistent with the Court's orders approving these sales, the Receiver segregated these net proceeds into separate subaccounts. (Dkt. Nos. 802, 841, 842, 910)

Also during the quarter, the Receiver filed his Tenth Motion to Confirm Sales of the following 13 apartment buildings and a vacant land parcel on October 5, 2020 (Dkt. No. 809):

- 4533-47 South Calumet Avenue, Chicago, Illinois 60653
- 4611-15 South Drexel Boulevard, Chicago, Illinois 60653
- 6217-27 South Dorchester Avenue, Chicago, Illinois 60637
- 7024-32 South Paxton Avenue, Chicago, Illinois 60649
- 7255-57 South Euclid Avenue, Chicago, Illinois 60649
- 4317-19 South Michigan Avenue, Chicago, Illinois 60653
- 7442-54 South Calumet Avenue, Chicago, Illinois 60619
- 7701-03 South Essex Avenue, Chicago, Illinois 60649
- 816-22 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 South Yates Avenue Chicago, Illinois 60649
- 431 East 42nd Place, Chicago, Illinois 60653 (vacant parcel)

On November 6, 2020, the Receiver filed his Reply to Objections raised as to eight of these properties (Dkt. No. 858) and obtained an order confirming the sale of the remaining six properties (Dkt. No. 842).

Contributing to greater motion practice and activity during the Fourth Quarter 2020, the Receiver and his counsel responded to two Seventh Circuit appeals of the Court's order overruling objections to the Receiver's Eighth and Ninth Motions to Confirm Sales (Dkt. No. 825), as well as district court motions to stay the property sales, to certify an interlocutory appeal, and to vacate

property sales, and participated in a mandatory settlement conference ordered by the Seventh Circuit. Ultimately, the Receiver obtained dismissal of both appeals and the motions pending in the district court were dismissed as moot, allowing the properties to be sold and their proceeds preserved for the benefit of claimants on the properties at issue

Also during the quarter, the Receiver marketed the 37 properties (consisting of four dwelling units or less) for which the Court approved a portfolio sale (Dkt. No. 682). Along with other promotional efforts, the Receiver advertised these properties for public bid for four consecutive weeks between December 14, 2020 and January 4, 2021 with a January 15, 2021 deadline for the submission of offers.

iii. The Financial Reporting and Rents Restoration

During the Fourth 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, reports were sent to lenders' counsel covering the periods through May 2020. In addition, the Receiver worked with his retained professionals to prepare reports for the period ended September 30, 2020 that also reflected (a) rentals restored to each property to which restoration remained outstanding pursuant to the February 13, 2019 Order (Dkt. No. 223), and (b) transfers from the sales proceeds held in separate accounts for certain properties equal to the amounts reimbursable from each such property, pursuant to the Order entered on September 21, 2020 (Dkt. No. 796), and as more specifically detailed in the Receiver's Second Motion For Restoration Of Funds Expended For The Benefit Of Other Properties (Dkt. No. 749). Those reports were distributed to lenders' counsel on January 25, 2021.



iv. Open Litigation

During the Fourth Quarter 2020, the settlement and release agreement was executed by the plaintiff in the matter captioned *Barnes v. EquityBuild, Inc., et al.*, Case No. 19 L 7852, Circuit Court of Cook County, and the matter was closed.

Fact and expert discovery have proceeded in the matter captioned *Byrd v. EquityBuild, Inc., et al.*, Case No. 18 L 1993, Circuit Court of Cook County and a discovery cutoff of March 31, 2021 has been set. Two outstanding orders for rules to show cause have been issued against two key witnesses, but due to COVID-19 the sheriff's office is not currently serving the orders. Discovery may need to be extended if defendant is unable to complete these two depositions.

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 which sum is included in the Receiver's pending Motion to Approve Use of Proceeds from Sales of Receivership Property, for which there was no objection. (Dkt. No. 902)

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 provided notice of the Receivership to the tenant's lawyer and notice of the claim to the institutional lender's counsel, and obtained medical records and a settlement demand.

v. Notice of Appointment of Receiver

During the Fourth 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 Fourth 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 Fourth Quarter 2020.

vii. Factual Investigation

During the Fourth 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 Fourth Quarter 2020, the Receiver and his retained counsel continued to evaluate potential third-party claims. The Receiver filed an amended complaint in the lawsuit pending 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 ("Rock Fusco"), (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. As of January 15, 2021, all Defendants have answered the complaint in the state court action brought by the Receiver and written discovery has commenced.

viii. Tax Issues

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 Fourth Quarter 2020, BrookWeiner prepared thirteen 2017 partnership tax returns.

Miller Kaplan was retained to serve as the Tax Administrator to take all necessary steps to enable the Settlement Fund to obtain and maintain the status of a taxable Qualified Settlement Fund (“QSF”), including the filing of all required elections and statements contemplated by those provisions, and to pay taxes in a manner consistent with treatment of the Settlement Fund as a QSF. During calendar year 2020, Miller Kaplan prepared and filed the 2019 Qualified Settlement Fund Income Tax Return, paid quarterly estimated taxes for the year 2020, and began preparation of the 2020 Qualified Settlement Fund Income Tax return,

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. (Dkt. Nos. 230, 311, 344 & 346)

c. Creditors and Claims Against the Receivership Estate

During the Fourth 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 Joint Status Report filed on December 16, 2020. (Dkt. No. 911 at Ex. 1A) 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 Fourth Quarter 2020 was devoted to working with counsel for institutional lenders and investor-lenders on the establishment of a claims resolution process. During the quarter, the Court held additional telephonic hearings on October 27 and December 17, 2020, regarding the Receiver's February 28, 2020 Motion for Approval of Process for Resolution of Disputed Claims (Dkt. No. 638), which proposed a process for the orderly resolution of claims submitted to the Receiver in this matter. (Dkt. Nos. 836, 915) At the Court's direction, the Receiver continued to work with counsel for claimants to prepare several joint status reports and motions, and in accordance with that directive counsel for the Receiver held several extended conference calls and exchanged multiple rounds of drafts of (1) Joint Status Report Regarding Pending Motions (Dkt. 805) filed on October 2, 2020; (2) Joint Motion to Resolve Disputes Regarding Standard Discovery (Dkt. No. 807) also filed on October 2, 2020; and (3) Joint Status Report Regarding Certain Elements of the Claims Process (Dkt. No. 911) filed on December 16, 2020.<sup>2</sup> Additionally, the Receiver responded to: (4) Certain Institutional Lenders' Proposal for Access to EquityBuild Documents (Dkt. No. 812) on October 27, 2020 (Dkt. No. 828); and (5) Motion for a Protective Order raising privilege issues related to

---

<sup>2</sup> A second Joint Status Report regarding the claims process was filed on January 22, 2021 (Dkt. No. 928). A substantial amount of the work on this latter report was conducted during the Fourth Quarter of 2020.

communications with the institutional lenders' insurers (Dkt. No. 866) on November 24, 2020 (Dkt. No. 884).

In connection with the discussions regarding the claims process, the Receiver also divided the properties in the estate into proposed groupings and shared his proposal with counsel for both the institutional lenders and certain of the investor-lenders, worked with vendors Axos and Avalon to ready the claims documentation for transfer to claimants, met with vendors CloudNine and TeamWerks to evaluate and receive training on their electronic discovery platform, and worked with counsel for the institutional lenders to draft a proposed order implementing the first phase of the claims process.

The Receiver also devoted significant time and effort before this Court and the Seventh Circuit Court of Appeals relating to motions initiated by certain of the institutional lender claimants. Briefing was completed on (1) the pending Motion for Priority Determination and Turnover of Sale Proceeds (Dkt. Nos. 785, 806, 817); (2) Motion for Reconsideration of the Court's September 23, 2020 minute order (Dkt. No. 801) related to the claims process (Dkt. Nos. 814, 818, 822, 823, 849), which was denied by the Court on December 17, 2020 (Dkt. 915); (3) Motion to Stay Sales and Motion for Certification of Interlocutory Appeal (Dkt. Nos. 832, 833, 834, 854, 862, 870), which were denied as moot in light of the Seventh Circuit's dismissal of the appeal on December 11, 2020. (Dkt. Nos. 898, 899); and (4) the Receiver's Motion to Dismiss the Appeal, which was granted by the Seventh Circuit Court of Appeals on December 11, 2020.<sup>3</sup>

The institutional lenders have raised a myriad of objections regarding each stage of the proposed process for the resolution of claims, which the Receiver responded to both orally and in

---

<sup>3</sup> As noted in Section I(b), Ventus Holdings also made several filings before the Court and the Seventh Circuit in an effort to stop the sales of three properties, all of which were denied.

writing during the quarter. These objections include the Receiver's role in the evaluation and resolution of competing claims and the Court's priority determinations, the scope and timing of discovery, the appropriateness of summary proceedings, the timing and mechanism for the Receiver's affirmative assertion of avoidance claims, and the means through which the costs for the administrative expenses associated with the process will be handled. The Court is continuing to evaluate various issues regarding the claims resolution process and to that end, another status conference was held on January 29, 2021.

Pursuant to the Court's order, the Receiver and his counsel worked with counsel for the institutional lenders on the hosting of EquityBuild's internal documents to provide access to all claimants, and to prepare standard discovery requests to investor-lender claimants and to institutional lender claimants and a protective order governing the discovery of confidential information. Pursuant to such discussions and further approvals and instructions from the Court as set forth in a conference held on December 17, 2020, a process is being established where efforts will be made to create the EquityBuild document library where access will be permitted for a small fee for a limited time period of approximately six months. Separately, over a three month period, links to claims submitted for a property will be provided to each claimant on that property, subject to terms of a confidentiality order that the court has entered. The Agreed Confidentiality Order was entered by the Court on December 19, 2020 (Dkt. No. 917), and proposed orders relating to claimants' access to the EquityBuild and claims documentation have been presented to the Court and were entered on February 9, 2021. (Order Relating to Claims Resolution Process (Dkt. No. 940) and Order Regarding Claims Resolution Process No. 2 (Dkt. No. 941))

As reflected in the December 17, 2020 status conference, the Court has also reviewed and largely approved of standard discovery that will be issued to each participant in a given group, in

the hope of expediting the resolution of each group. A few items related to standard discovery remain under review, as do other matters regarding the other discovery to occur during the claims resolution process.

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://rdaplawnet.com/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 \$213,249.56. (*See also* Dkt. No. 258 at 21, and Dkt. No. 348 at 23-24, for additional information relating to these funds) Additionally, 89 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 December 31, 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 Tenth Status Report (Fourth Quarter 2020) for additional information. (Dkt. No. 930)

#### **IV. BILLING ADDRESSED IN THIS APPLICATION**

11. Pursuant to the Billing Instructions, the Receiver provides the following information regarding current billing:

- a. Total Compensation and Expenses Requested.
  - i. In connection with his duties, the Receiver respectfully requests compensation for services rendered, totaling \$87,438.00 for the period of this Application. Copies of the Receiver's invoices for – October, November, and December, 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 \$318,955.81 for the period of this Application. Copies of RDP's invoices for October, November, and December, 2020 are attached as **Exhibit G.** Additionally, Receiver's counsel Andrew Porter received \$44,054 as agency fees for the title examination work performed in connection with the closing of properties during the Fourth Quarter 2020. The Receiver will reduce the amount due to RDP for the Fourth 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 \$10,335.00 for the period of this Application. Copies of BrookWeiner's invoices for October, November, and December, 2020, are attached as **Exhibit H.**
- iv. In connection with the accounting provided to the Receiver by Miller Kaplan, the Receiver respectfully requests compensation for services rendered, along with reimbursement of expenses, totaling \$5,603.20 for the period of this Application. A copy of Miller Kaplan's invoice for the period ending December 31, 2020 is 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 \$120.00 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 Prometheus, the Receiver respectfully requests compensation for services rendered, along with reimbursement of expenses, totaling \$990.00 for the period of this Application. A copy of Prometheus's invoice is attached as **Exhibit K.**

b. Source of Funds for Requested Compensation and Expenses. 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. Tenth Application for Payment of Professional Fees and Expenses. This is the Receiver's Tenth Interim Application.

d. Summary of Activity. A "Summary of Activity," providing the total hours billed and the amount of billing for each person who billed time during the Application period (October 1, 2020 through December 31, 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. (Dkt. 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.*, Dkt. No. 778, at 18-25; Dkt. No. 638, ¶¶ 53-57; Dkt. No. 720, at 14-20; Dkt. 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.

**VI. CONCLUSION**

WHEREFORE, the Receiver respectfully requests that the Court approve the Receiver's Tenth 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, Miller Kaplan Arase LLP, Axos Fiduciary 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.

Dated: February 23, 2021

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@rdaplawn.net](mailto:mrachlis@rdaplawn.net)  
[jwine@rdaplawn.net](mailto:jwine@rdaplawn.net)

**RECEIVER'S CERTIFICATION**

1. Pursuant to the Billing Instructions, the Receiver certifies as follows regarding the Receiver's Tenth 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); and

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 February 16, 2021, 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.

Dated: February 23, 2021

/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 &amp; Peel, LLC Rates

<b>Professional/ Paraprofessional</b>	<b>Position</b>	<b>2020 Standard Hourly Rates</b>	<b>2020 Discounted 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
Julia Porter	RDP Legal Assistant	\$140	\$95

BrookWeiner Billing Rates

20% discount from  
current standard rates

---

Staff Accountant	\$110/hour
Manager	\$210/hour
Partner	\$275/hour



## Miller Kaplan Arase LLP

## Schedule of Fees- Standard and Discounted Rates

<b>Name</b>	<b>Rate Per Hour Standard</b>	<b>Discounted 80%</b>	<b>Title</b>
Jude Damasco	\$ 550.00	\$ 440.00	Partner
Julia Damasco	\$ 550.00	\$ 440.00	Partner
John Mandeville	\$ 265.00	\$ 212.00	Senior Acct.
John Mandeville	\$ 270.00	\$ 216.00 (rate increase Dec. 2020)	
Jessica Corbin	\$ 210.00	\$ 168.00	Acct. Staff
Jessica Corbin	\$ 225.00	\$ 180.00 (rate increase Dec. 2020)	
Alla Maumus	\$ 175.00	\$ 140.00	Acct. Staff
Emily Ransom	\$ 200.00	\$ 160.00	Acct. Staff
Nicole Nelson	\$ 80.00	\$ 64.00	Acct. Staff
Cindy Allred	\$ 70.00	\$ 56.00	Acct. Staff

Axos Financial Services

<b>Professional</b>	<b>Position</b>	<b>Hourly Rates</b>
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

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

# **EXHIBIT B**



# **EXHIBIT C**

STANDARDIZED FUND ACCOUNTING REPORT for EQUITYBUILD, INC., et al. - Cash Basis  
 Receivership; Civil Court Docket No. 18-cv-05587  
 Reporting Period 10/1/2020 to 12/31/2020

Fund Accounting (See Instructions):				
		<u>Detail</u>	<u>Subtotal</u>	<u>Grand Total</u>
Line 1	<b>Beginning Balance (As of 10/1/2020):</b>	\$1,167,227.32		\$1,167,227.32
	<b><i>Increases in Fund Balance:</i></b>			
Line 2	<b>Business Income</b>			
Line 3	<b>Cash and unliquidated assets</b>			
Line 4	<b>Interest/Dividend Income</b>	\$758.19		
Line 5	<b>Business Asset Liquidation</b>			
Line 6	<b>Personal Asset Liquidation</b>			
Line 7	<b>Net Income from Properties</b>			
Line 8	<b>Miscellaneous - Other<sup>1</sup></b>	\$148,302.95		
	<b>Total Funds Available (Line 1-8):</b>			<b>\$1,316,288.46</b>
	<b><i>Decrease in Fund Balance:</i></b>			
Line 9	<b>Disbursements to Investors</b>			
Line 10	<b>Disbursements for receivership operations</b>			
Line 10a	Disbursements to receiver or Other Professionals			
Line 10b	Business Asset Expenses <sup>2</sup>	(\$134,407.03)		
Line 10c	Personal Asset Expenses			
Line 10d	Investment Expenses			
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees			
	2. Litigation Expenses			
	<b>Total Third-Party Litigation Expenses</b>		\$0.00	
Line 10f	Tax Administrator Fees and Bonds			
Line 10g	Federal and State Tax Payments			
	<b>Total Disbursements for Receivership Operations</b>		(\$134,407.03)	
Line 11	<b>Disbursements for Distribution Expenses Paid by the Fund:</b>			
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			
	<b>Total Plan Development Expenses</b>		\$0.00	
Line 11b	Distribution Plan Implementation Expenses:			
	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 10/1/2020 to 12/31/2020

	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 Administrator Bond		
	5. Miscellaneous		
	6. Federal Account for Investor Restitution (FAIR) reporting Expenses		
	Total Plan Implementation Expenses		
	Total Disbursement for Distribution Expenses Paid by the Fund		\$0.00
<b>Line 12</b>	<b>Disbursement to Court/Other:</b>		
Line 12a	Investment Expenses/Court Registry Investment System (CRIS) Fees		
Line 12b	Federal Tax Payments		
	Total Disbursement to Court/Others:		
	<b>Total Funds Disbursed (Lines 1-12):</b>		(\$134,407.03)
<b>Line 13</b>	<b>Ending Balance (As of 12/31/2020):</b>		<b>\$1,181,881.43</b>
<b>Line 14</b>	<b>Ending Balance of Fund - Net Assets:</b>		
Line 14a	Cash & Cash Equivalents		\$1,181,881.43
Line 14b	Investments (unliquidated Huber/Hubadex investments)		
Line 14c	Other Assets or uncleared Funds		
	<b>Total Ending Balance of Fund - Net Assets</b>		<b>\$1,181,881.43</b>

<sup>1</sup> Refund of insurance premium financing payments for sold property (6751 S Merrill) - \$240.00; funds transfers from property accounts per 10/30/20 Order (#843) on 2d restoration motion - \$148,062.95; TOTAL: \$148,302.95

<sup>2</sup> Insurance (\$96,968.83); property utilities (\$11,023.69); property security installations (\$4,591.08); property repairs (\$10,076.68); property management fees (\$2,003.00); payment of retained professional fees for 1Q and 2Q2020 per 10/26/20 Order (#824); (\$9,743.75); TOTAL \$134,407.03.

Receiver:

/s/ Kevin B. Duff



STANDARDIZED FUND ACCOUNTING REPORT for EQUITYBUILD, INC., et al. - Cash Basis  
Receivership; Civil Court Docket No. 18-cv-05587  
Reporting Period 10/1/2020 to 12/31/2020

(Signature)

Kevin B. Duff, Receiver EquityBuild, Inc., et al.

(Printed Name)

Date: January 26, 2021

# **EXHIBIT D**

**Master Asset List**

<b>Receiver's Account (as of 12/31/2020)</b>		
<b>Institution</b>	<b>Account Information</b>	<b>Amount</b>
AXOS Fiduciary Services	Checking #0181	\$1,055,148.26
AXOS Fiduciary Services	Checking #0348	\$126,733.17
		Total: \$1,181,881.43

<b>Receivership Defendants' Accounts</b>			
<b>Institution</b>	<b>Account Information</b>	<b>Current Value</b>	<b>Amount Transferred to Receiver's Account</b>
Wells Fargo	Checking (53 accounts in the names of the affiliates and affiliate entities included as Receivership Defendants)		\$190,184.13 <sup>1</sup>
Wells Fargo	Checking (account in the names of Shaun Cohen and spouse)		\$23,065.43 <sup>2</sup>
Byline Bank	Checking (2 accounts in names of Receivership Defendants)	\$21,828.73 <sup>3</sup>	
			Total: \$213,249.56

<b>EquityBuild Real Estate Portfolio</b>	
For a list of the properties within the EquityBuild portfolio identified by property address, alternative address (where appropriate), number of units, and owner, <i>see</i> Exhibit 1 to the Receiver's First Status Report, Docket No. 107. See also Exhibit E hereto.	
<b>Other, Non-Illinois Real Estate</b>	
<b>Description</b>	<b>Appraised Market Value</b>
Single family home in Plano, Texas	±\$450,000.00
	Approximate mortgage amount: \$400,000.00 Approximate value less mortgage: \$50,000.00

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

# **EXHIBIT E**

## SEC v. EquityBuild, Inc., et al.

No. 18-cv-5587

## Balances of Funds in Property Specific Accounts as of December 31, 2020

Account Number	Account Name	Account Balance (as of December 31, 2020)	Date of Settlement	Reason for Change (if any) 10/1/20 - 12/31/20
0025	7301 S Stewart Ave	\$302,674.81	11/4/2019	Interest earned, \$190.15
0033	5001-05 S Drexel	\$2,719,323.46	5/22/2019	Interest earned, \$1,708.33
0041	7927-49 S Essex	\$642,868.78	5/1/2019	Interest earned, \$403.86
0058	8100-14 S Essex	\$926,599.60	4/30/2019	Interest earned, \$582.10
0066	6160-6212 S King	\$428,856.60	4/30/2019	Interest earned, \$269.41
0108	8047 S. Manistee	\$806,947.63	2/5/2020	Interest earned, \$506.93
0116	5955 S. Sacramento	\$448,986.96	11/5/2019	Interest earned, \$282.06
0124	6001-05 S. Sacramento	\$327,036.56	11/5/2019	Interest earned, \$205.45
0132	7026-42 S. Cornell	\$865,975.06	11/6/2019	Interest earned, \$544.01
0157	7834-44 S. Ellis	\$1,632,532.19	11/4/2019	Interest earned, \$1,025.58
0165	701-13 S. 5th Avenue	\$597,747.79	3/31/2020	Refund from title company of unused escrow funds, \$142,798.11; interest earned, \$354.06
0199	7625 S. East End	\$1,238,662.35	12/20/2019	Interest earned, \$778.15
0207	7635 S. East End	\$1,046,270.38	12/20/2019	Interest earned, \$657.28
0215	7748 S. Essex	\$1,169,126.89	12/18/2019	Interest earned, \$734.46
0223	7750 S. Muskegon	\$408,538.52	12/18/2019	Interest earned, \$256.65
0231	7749-59 S. Yates	\$647,543.90	4/22/2020	Transfer to Receiver's account in accordance with Order (#843) on 2d restoration motion (\$139,383.80); interest earned, \$434.41
0249	7450 S. Luella	\$186,135.60	5/7/2020	Interest earned, \$116.93
0256	4520-26 S. Drexel	\$5,883,614.92	5/21/2020	Interest earned, \$3,696.18
0264	6749-59 S. Merrill	\$1,398,209.10	4/28/2020	Interest earned, \$878.38
0272	7110 S. Cornell	\$1,146,680.00	8/13/2020	Interest earned, \$720.36
0298	7600 S. Kingston	\$1,377,480.29	12/3/2020	Proceeds from 12/3/20 sale of property, \$1,377,207.46; interest earned, \$272.83
0306	7656 S. Kingston	\$230,837.38	12/2/2020	Proceeds from 12/2/20 sale of property, \$230,791.66; interest earned, \$45.72
0314	8201 S. Kingston	\$279,204.19	5/21/2020	Interest earned, \$175.40
0322	8326-58 S. Ellis	\$1,311,281.33	6/11/2020	Refund from title company of unused escrow funds, \$2,000.00; interest earned, \$823.47
0330	6949-59 S. Merrill	\$1,405,122.05	12/1/2020	Proceeds from 12/1/20 sale of property, \$1,404,824.55; interest earned, \$297.50
0355	7546 S. Saginaw	\$510,616.73	5/13/2020	Interest earned, \$321.65
0363	638 N. Avers	\$336,001.06	n/a	Insurance settlement for fire damage (additional amount) \$111,758.22; payment of property management expenses, (\$13,140.29); payment of commission to insurance broker (\$32,486.92); payment of fees to fire board-up service (\$11,139.00); interest earned, \$191.10
0371	5450 S. Indiana	\$1,650,075.30	6/25/2020	Transfer to Receiver's account in accordance with Order (#843) on 2d restoration motion (\$8,679.15); interest earned, \$1,041.16
0389	6437 S. Kenwood	\$1,317,233.21	6/25/2020	Interest earned, \$829.77
0397	7300 S. St. Lawrence	\$283,544.58	7/27/2020	Interest earned, \$178.62
0405	7760 S. Coles	\$120,606.44	6/26/2020	Interest earned, \$75.98
0413	8000 S. Justine	\$184,483.98	6/26/2020	Interest earned, \$116.21
0421	8107-09 S. Ellis	\$94,916.63	6/30/2020	Interest earned, \$59.80
0439	8209 S. Ellis	\$253,342.74	7/1/2020	Interest earned, \$159.59
0447	8214-16 S. Ingleside	\$204,692.87	6/30/2020	Interest earned, \$127.54
0454	11117 S. Longwood	\$1,589,102.58	7/8/2020	Interest earned, \$1,001.04
0462	1700 Juneway	\$2,629,327.52	10/20/2020	Proceeds from 10/20/20 sale of property, \$2,628,031.19; interest earned, \$1,296.33
0470	1131-41 E. 79th	\$1,055,948.44	12/22/2020	Proceeds from 12/22/20 sale of property, \$1,055,876.12; interest earned, \$72.32
0488	2736 W. 64th	\$373,360.72	9/29/2020	Interest earned, \$235.19

## SEC v. EquityBuild, Inc., et al.

No. 18-cv-5587

## Balances of Funds in Property Specific Accounts as of December 31, 2020

Account Number	Account Name	Account Balance (as of December 31, 2020)	Date of Settlement	Reason for Change (if any) 10/1/20 - 12/31/20
0496	3074 Cheltenham	\$1,012,831.26	9/24/2020	Post-sale reconciliation proceeds from property manager, \$51,828.28; interest earned, \$608.56
0504	5618 S. Martin Luther King	\$601,063.85	9/29/2020	Interest earned, \$378.64
0512	6250 S. Mozart	\$863,100.40	12/22/2020	Proceeds from 12/22/20 sale of property, \$843,372.55; interest earned, \$70.16
0520	6355 S. Talman	\$472,440.40	9/29/2020	Interest earned, \$297.61
0538	6356 S. California	\$312,751.81	9/29/2020	Interest earned, \$197.01
0546	6554-58 S. Vernon	\$528,947.39	10/15/2020	Proceeds from 10/15/20 sale of property, \$528,668.50; interest, \$278.89
0553	7051 S. Bennett	\$483,127.84	9/23/2020	Interest earned, \$304.34
0561	7201 S. Constance	\$952,017.95	9/30/2020	Interest earned, \$599.71
0579	7201-07 S. Dorchester	\$416,779.79	10/20/2020	Proceeds from 10/20/20 sale of property, \$413,136.81; refund from title company of unused escrow funds, \$3,438.04; interest earned, \$204.94
0587	7508 S. Essex	\$691,115.13	10/28/2020	Proceeds from 10/28/20 sale of property, \$690,807.52; interest earned, \$307.61
0595	7957 S. Marquette	\$279,970.84	9/21/2020	Interest earned, \$176.36
0603	4533 S. Calumet	\$1,969,944.25	12/1/2020	Proceeds from 12/1/20 sale of property, \$1,969,074.99; interest earned, \$418.42
0611	1017 W. 102nd	\$4,496.31	n/a	Interest earned, \$2.83
0629	1516 E. 85th	\$2,903.75	n/a	Interest earned, \$1.83
0637	417 Oglesby	\$369.96	n/a	Interest earned, \$0.23
0645	7922 S. Luella	\$200.67	n/a	Interest earned, \$0.13
0652	7925 S. Kingston	\$2,056.09	n/a	Interest earned, \$1.29
0660	8030 S. Marquette	\$1,414.11	n/a	Interest earned, \$0.89
0678	8104 S. Kingston	\$2,647.79	n/a	Interest earned, \$1.67
0686	8403 S. Aberdeen	\$2,354.58	n/a	Interest earned, \$1.48
0694	8405 S. Marquette	\$1,945.78	n/a	Interest earned, \$1.23
0702	8529 S. Rhodes	\$935.69	n/a	Interest earned, \$0.59
0710	9212 S. Parnell	\$2,461.76	n/a	Interest earned, \$1.55
0728	10012 S. LaSalle	\$2,024.92	n/a	Interest earned, \$1.27
0736	11318 S. Church	\$1,159.98	n/a	Interest earned, \$0.73
0744	6554 S. Rhodes	\$1,086.73	n/a	Interest earned, \$0.68
0751	6825 S. Indiana	\$1,054.11	n/a	Interest earned, \$0.66
0769	7210 S. Vernon	\$224.23	n/a	Interest earned, \$0.15
0777	7712 S. Euclid	\$1,642.25	n/a	Interest earned, \$1.04
0785	8107 S. Kingston	\$367.55	n/a	Interest earned, \$0.23
0793	8346 S. Constance	\$1,471.84	n/a	Interest earned, \$0.92
0801	8432 S. Essex	\$393.52	n/a	Interest earned, \$0.25
0819	8517 S. Vernon	\$1,174.48	n/a	Interest earned, \$0.74
0827	2129 W. 71st	\$1,002.69	n/a	Interest earned, \$0.63
0835	9610 S. Woodlawn	\$2,330.52	n/a	Interest earned, \$1.47
0843	1401 W. 109th	\$2,368.74	n/a	Interest earned, \$1.49
0850	1139 E. 79th	\$3,706.04	n/a	Interest earned, \$2.33
0868	4611 S. Drexel	\$43,820.47	n/a	Interest earned, \$27.61
0876	6217 S. Dorchester	\$12,826.65	n/a	Interest earned, \$8.08
0884	7255 S. Euclid	\$26,425.71	n/a	Interest earned, \$16.65
0892	7024 S. Paxton	\$45,157.36	n/a	Interest earned, \$28.45
0900	4317 S. Michigan	\$791,811.22	12/2/2020	Proceeds from 12/2//20 sale of property, \$787,969.95; interest earned, \$164.24
0918	7701 S. Essex	\$646,029.07	11/16/2020	Proceeds from 11/16/20 sale of property, \$641,060.09; interest earned, \$200.62
0926	816 E. Marquette	\$752,554.46	11/18/2020	Proceeds from 11/18/20 sale of property, \$747,245.26; interest earned, \$228.44
0934	1422 E. 68th	\$1,823.22	n/a	Interest earned, \$1.15
0942	2800 E. 81st	\$5,401.18	n/a	Interest earned, \$3.40

*SEC v. EquityBuild, Inc., et al.*

No. 18-cv-5587

## Balances of Funds in Property Specific Accounts as of December 31, 2020

Account Number	Account Name	Account Balance (as of December 31, 2020)	Date of Settlement	Reason for Change (if any) 10/1/20 - 12/31/20
0959	4750 S. Indiana	\$13,133.06	n/a	Interest earned, \$8.28
0967	7840 S. Yates	\$8,764.09	n/a	Interest earned, \$5.53
0975	7442-48 S. Calumet	\$518,720.74	11/16/2020	Proceeds from 11/16/20 sale of property, \$518,560.89; interest earned, \$159.85
0983	431 E. 42nd Place	\$59,398.89	11/5/2020	Proceeds from 11/5/20 sale of property, \$59,375.71; interest earned, \$23.18
	<b>TOTAL FUNDS HELD:</b>	<b>\$49,583,260.26</b>		

# **EXHIBIT F**



## Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
SUITE 900  
CHICAGO, ILLINOIS 60605

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

February 8, 2021

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.6621127

Legal Fees for the period October 2020	\$28,431.00
Expenses Disbursed	\$0.00
	<hr/>
<b>Due this Invoice</b>	<b>\$28,431.00</b>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Asset Disposition</u>			
10/1/2020	KBD	1.20	Telephone conference with and draft correspondence to real estate broker and A. Porter regarding property sales and related issues (7201 Dorchester, 7237 Bennett) (.6); confer with M. Rachlis and J. Wine regarding same (7201 Dorchester, 7237 Bennett) (.1); exchange correspondence with J. Rak regarding post sale reconciliation (7110 Cornell) (.1); exchange correspondence with M. Rachlis regarding tenth sales motion (.2); exchange correspondence with J. Rak regarding purchaser's lender request for property access (2800-06 E. 81st) (.2).
			Asset Disposition
10/2/2020	KBD	1.20	Study and revise tenth sales motion.
			Asset Disposition
10/4/2020	KBD	0.50	Revise tenth motion to approve sales and exchange correspondence regarding same.
			Asset Disposition
10/5/2020	KBD	0.80	Review revised tenth motion to approve sales and exchange correspondence regarding filing of same (.5); draft correspondence to real estate broker regarding negotiation with potential buyer (1102 Bingham) (.1); review correspondence regarding lease units, sale, and closing (7201 Dorchester) (.2).
			Asset Disposition
10/6/2020	KBD	0.30	Telephone conference with A. Porter regarding closing on sale of property and water certificate and escrow issue (5618 King) and relating to efforts to resolve potential closing issue with another property and communications with purchaser and asset manager (7201 Dorchester) (.1); exchange correspondence with K. Pritchard and bank representatives regarding transfer of funds and telephone conference with bank representative regarding same (7201 Dorchester) (.2).
			Asset Disposition
10/7/2020	KBD	0.50	Work on tenth sales motion (.3); exchange correspondence with A. Porter regarding planning for additional sales (6558 South Vernon, 1700 West Juneway, 7201 South Dorchester, 7508 South Essex, 431 East 42nd Street, 7237 South Bennett, 638 North Avers, and 7109 South Calumet) (.2).
			Asset Disposition
10/12/2020	KBD	2.40	Confer with real estate broker, A. Porter, and M. Rachlis regarding efforts and planning to sell certain properties (7109 Calumet) (1.2), (638 Avers) (.3), (7237 Bennett) (.4), (7508 Essex) (.3); exchange correspondence with J. Wine and real estate broker regarding housing court action (7508 Essex) (.2).
			Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/13/2020	KBD	0.20	Attention to post-closing receipt and deposit of escrow funds (701 S. 5th).  Asset Disposition
10/14/2020	KBD	0.80	Work on closing documents with J. Rak and A. Watychowicz (6558 S Vernon, 1700 S Juneway, 7201 S Dorchester, 7508 S. Essex).  Asset Disposition
10/15/2020	KBD	0.80	Study purchase offer and exchange correspondence with real estate broker and A. Porter regarding same (1102 Bingham) (.3); telephone conference with J. Wine regarding property sale and related expenses (1102 Bingham) (.1); exchange correspondence with A. Porter regarding PSA for property (7508 Essex) (.2); exchange correspondence regarding closing and property management expenses (7051 Bennett) (.2).  Asset Disposition
10/16/2020	KBD	1.00	Work with A. Porter and J. Rak on planning for listing SFR portfolio and title exception and insurance issues (.6), closing planning for property (1700 Juneway) (.1), purchase offer on property (1102 Bingham) (.1), and property manager liens and expenses (.2).  Asset Disposition
10/19/2020	KBD	0.20	Exchange correspondence with A. Porter regarding sale of property (1102 Bingham).  Asset Disposition
10/20/2020	KBD	1.30	Work on sale agreement for property (1102 Bingham) and draft correspondence to real estate broker regarding same.  Asset Disposition
10/22/2020	KBD	0.40	Study correspondence regarding title issue (7237-43 South Bennett, 7933 S Kingston, 8104 S Kingston, 8529 S Rhodes, 1401 W 109th, 310 E 50th, 6807 S Indiana) (.2); exchange correspondence with A. Porter regarding funds from sales of properties (701 S 5th, 8326-38 S Ellis) (.1); study correspondence from real estate broker regarding sale of property (7237 Bennett) (.1).  Asset Disposition
10/23/2020	KBD	2.00	Telephone conference with real estate broker regarding efforts to sell and close on properties (7237 Bennett, 7109 Calumet, 648 Avers, SFR portfolio) (.2); work on preparation for marketing and listing of single-family residence portfolio and prepare for call with broker and lenders counsel (.5); confer with broker, lenders counsel, and A. Porter regarding single-family residence portfolio marketing and listing planning, title issues, due diligence materials, bid procedures, credit bid interest, and procedure for reviewing bids (.4); exchange correspondence with J. Wine regarding order approving sale of properties without objection in tenth motion to approve sales (4533-47 South Calumet, 4317-19 South Michigan, 7442-54 South Calumet, 7701-03 South Essex, 816-22 East Marquette, 431 East 42nd Place) (.3); draft correspondence to real estate broker regarding same (4533-47 South

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
			Calumet, 4317-19 South Michigan, 7442-54 South Calumet, 7701-03 South Essex, 816-22 East Marquette, 431 East 42nd Place) (.1); attention to closing document (4611 Drexel) (.1); exchange correspondence with A. Porter and J. Wine regarding closing on sales of properties (4533-47 South Calumet, 4317-19 South Michigan, 7442-54 South Calumet, 7701-03 South Essex, 816-22 East Marquette, 431 East 42nd Place) (.2); study further correspondence regarding exceptions to title issues (7237-43 South Bennett, 7933 S Kingston, 8104 S Kingston, 8529 S Rhodes, 1401 W 109th, 310 E 50th, 6807 S Indiana) (.2).		
			Asset Disposition		
10/30/2020	KBD	1.40	Exchange correspondence with A. Porter regarding communications with defaulting purchaser (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2); confer with A. Porter and real estate broker regarding property sale efforts and various related issues (7600 Kingston, 7656 Kingston, 6949 Merrill, 7237 Bennett, 7109 Calumet, 638 Avers) (1.2).		
			Asset Disposition		
SUBTOTAL:				[ 15.00	5850.00]
<u>Business Operations</u>					
10/1/2020	KBD	0.40	Review information from J. Rak regarding real estate taxes (.2); attention to utility invoices issue (.2).		
			Business Operations		
10/5/2020	KBD	0.20	Exchange correspondence with J. Rak regarding buyer's appraiser(2800-06 81st) (.1); review correspondence from J. Wine regarding administrative hearing actions (7109 Calumet) (.1).		
			Business Operations		
10/6/2020	KBD	1.10	Exchange correspondence with insurance adjuster regarding efforts to complete settlement of claim (638 Avers) (.2); attention to notice of attorney's lien (7110 Cornell) (.2); confer with government representative (.7).		
			Business Operations		
10/7/2020	KBD	0.50	Exchange various correspondence regarding corporate issues.		
			Business Operations		
10/9/2020	KBD	0.90	Telephone conference and exchange correspondence with insurance broker and J. Wine regarding potential claim (7110-16 Cornell) (.2); exchange correspondence with property manager and asset manager regarding additional security for property (638 Avers) (.1); study financial reporting from property managers (.5); exchange correspondence with property manager regarding potential property repair (7237 Bennett) (.1).		

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Business Operations
10/11/2020	KBD	0.50	Work on state court actions regarding property (7508 Essex) and exchange correspondence with A. Porter and asset manager.
			Business Operations
10/12/2020	KBD	0.50	Attention to payment of security expense (638 Avers) (.2); work on proofs for insurance settlement and exchange correspondence with adjuster regarding same and potential recovery (638 Avers) (.3).
			Business Operations
10/13/2020	KBD	0.50	Exchange correspondence with property manager and K. Pritchard regarding security service and expense (7237 S. Bennett) (.2); telephone conference with E. Duff regarding property expenses and financial reporting (.3).
			Business Operations
10/14/2020	KBD	0.20	Exchange correspondence with J. Wine regarding lawsuit relating to property (1102 Bingham).
			Business Operations
10/15/2020	KBD	0.30	Telephone conference with J. Wine regarding property manager expense reimbursement (7051 S Bennett, 7749 S Yates, 8201 S Kingston, 8947 S Manistee).
			Business Operations
10/19/2020	KBD	0.20	Attention to property expenses (638 Avers, 1401 W 109th, 7201 Dorchester).
			Business Operations
10/20/2020	KBD	0.50	Exchange correspondence with K. Pritchard regarding insurance issues (.2); work on restoration of funds (.3).
			Business Operations
10/21/2020	KBD	0.40	Study objections to tenth property sales motion.
			Business Operations
10/23/2020	KBD	0.30	Exchange correspondence with insurance adjuster and K. Pritchard regarding claim and expense amounts (638 Avers) (.2); exchange correspondence with asset manager regarding water meter vault compliance (7838-40 S. Yates) (.1).
			Business Operations
10/26/2020	KBD	0.20	Exchange correspondence with insurance adjuster and K. Pritchard regarding recovery of insurance settlement proceeds (638 Avers).
			Business Operations

Date	Indiv	Hours	Description		
10/28/2020	KBD	0.40	Exchange correspondence regarding order on second restoration motion (.2); exchange correspondence regarding water meter repair and cost (7838-40 S Yates) (.2).		
			Business Operations		
SUBTOTAL:				[ 7.10	2769.00]

Claims Administration & Objections

10/1/2020	KBD	3.20	Confer and exchange correspondence with M. Rachlis and J. Wine regarding claims process, standard discovery, joint report on open issues, turnover motion, and various related issues (1.0); telephone conference with A. Porter regarding property record and deed analysis (6751 Merrill, 7110 Cornell) (.2); work on response to claimant's turnover motion and further confer with M. Rachlis and J. Wine regarding same (6751 Merrill, 7110 Cornell) (1.1); study and revise joint status report on open issues and standard discovery requests (.8); attention claimant communication and exchange correspondence with A. Watychowicz regarding same (.1).		
			Claims Administration & Objections		
10/2/2020	KBD	2.90	Study and revise standard discovery requests and exchange correspondence with J. Wine and M. Rachlis regarding same (.5); work on response to turnover motion (7110 Cornell, 6751 Merrill) (1.7); study and revise joint motion regarding standard discovery and exchange correspondence regarding same (.5); telephone conference with J. Wine regarding instructions in investor lender standard discovery requests (.2);		
			Claims Administration & Objections		
10/7/2020	KBD	1.10	Study information relating to potential repair and credit to purchaser (7237 Bennett) (.2); work and correspondence relating to potential claim (7110 Cornell) (.5); draft correspondence to lender's counsel regarding same (7110 Cornell) (.1); work on efforts to resolve dispute with lender regarding letter of credit (7109 Calumet) (.3).		
			Claims Administration & Objections		
10/8/2020	KBD	0.50	Attention to potential claim (7110 Cornell) (.2); attention to communications from claimants (.3).		
			Claims Administration & Objections		
10/9/2020	KBD	0.20	Exchange correspondence regarding potential claim (7110 Cornell).		
			Claims Administration & Objections		
10/10/2020	KBD	0.20	Study institutional lender proposal regarding EquityBuild documents and exchange correspondence with regarding same.		
			Claims Administration & Objections		

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/11/2020	KBD	0.20	Exchange correspondence with A. Porter regarding property manager claim (7237 Bennett).  Claims Administration & Objections
10/12/2020	KBD	0.70	Study correspondence from J. Wine regarding personal injury claim and attorney lien (4520 Drexel) (.2); work on communications with claimants (.1); study motion for reconsideration (.4).  Claims Administration & Objections
10/13/2020	KBD	1.10	Analysis of claims process methodology (.3); work on response to claimants' requests for information (.4); attention to tax claim lawsuit (1102 Bingham) (.3); review proof of claim and correspondence regarding same (.1).  Claims Administration & Objections
10/14/2020	KBD	2.30	Study claimants' reply brief relating to turnover motion (6751 Merrill, 7110 Cornell) (.3); analysis of letter of credit issues and draft correspondence to A. Porter and M. Rachlis regarding same (7109 Calumet) (.6); draft and revise correspondence to claimants' counsel regarding requests for claims, documents, and information (.5); work on responses to claimants' requests for information (.4); study correspondence from insurance adjuster regarding claim relating to property (638 Avers) (.2); draft correspondence to accountant regarding same and recovery of funds (.1); exchange correspondence with claimants' counsel regarding same (638 Avers) (.2).  Claims Administration & Objections
10/15/2020	KBD	0.80	Draft correspondence to claimant's counsel regarding proof of claim forms and EB documents and exchange correspondence with M. Rachlis regarding same (.5); study claims by property (.3).  Claims Administration & Objections
10/16/2020	KBD	0.60	Confer with A. Porter and J. Rak regarding claims analysis planning (.1); work on communications with claimants (.2); draft correspondence to claimants' counsel regarding EB documents and proof of claim forms (.3).  Claims Administration & Objections
10/19/2020	KBD	0.30	Study reply brief regarding turnover motion (.2); exchange correspondence regarding claimant inquiry relating to post-sale reconciliation (.1).  Claims Administration & Objections
10/20/2020	KBD	1.00	Draft correspondence to M. Rachlis regarding summary proceedings (.4); attention to response to motion for reconsideration and study correspondence regarding same (.4); review and exchange correspondence regarding state court lawsuit (.2).  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/22/2020	KBD	3.70	Work on response to claimants' motion for reconsideration.  Claims Administration & Objections
10/23/2020	KBD	4.20	Draft and revise response to claimants' motion for reconsideration, and draft correspondence to M. Rachlis regarding same (2.8); study hearing transcripts, draft correspondence, and evaluate claimants' proposal for document data base and cost sharing (1.3); study correspondence from claimant regarding institutional lenders and discovery (.1).  Claims Administration & Objections
10/24/2020	KBD	1.70	Draft and revise response to claimants' motion for reconsideration, and exchange correspondence with M. Rachlis regarding same.  Claims Administration & Objections
10/25/2020	KBD	2.00	Draft and revise response to claimants' motion for reconsideration and exchange correspondence with M. Rachlis regarding same (1.9); review correspondence regarding EB documents for repository (.1).  Claims Administration & Objections
10/26/2020	KBD	3.20	Draft and revise response to claimants' motion for reconsideration and exchange correspondence with M. Rachlis and J. Wine regarding same (1.6); revise response to document database proposal and exchange various correspondence regarding same (.9); study SEC opposition to motion for reconsideration (.2); prepare for hearing on claims before Judge Lee and exchange correspondence regarding same (.5).  Claims Administration & Objections
10/27/2020	KBD	7.40	Prepare for hearing before Judge Lee on claims (1.1); work on claims process planning and progression of review (1.0); confer with M. Rachlis and J. Wine regarding issues relating to hearing before Judge Lee (.8); attention to communications from numerous claimants (.9); confer with SEC, M. Rachlis, and J. Wine (.4); appear at hearing before Judge Lee (2.3); confer with M. Rachlis regarding hearing before Judge Lee (.3); study claimants' motions to stay and to certify questions (.3); review and draft correspondence regarding claim (4611 Drexel) (.2); exchange correspondence regarding document database proposal (.1).  Claims Administration & Objections
10/28/2020	KBD	2.10	Confer with M. Rachlis, J. Wine, and A. Porter regarding claimants' motion to stay property sales (6250 Mozart, 1131-41 79th), claims review issues, and various related property sale issues (1.5); exchange correspondence regarding estimated closing costs (638 Avers) (.1); exchange correspondence regarding planning for sale of properties and lender request for delay (6250 Mozart, 1131-41 79th) (.3); study correspondence from M. Rachlis regarding claimants' appeal (.2).  Claims Administration & Objections



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/29/2020	KBD	1.40	Work on communications with claimants regarding claims process and standard discovery (1.1); exchange correspondence with J. Wine regarding logistics for disseminating claim forms and supporting documents to claimants (.3).  Claims Administration & Objections
10/30/2020	KBD	2.70	Telephone conferences with SEC (.3); exchange correspondence with J. Wine and A. Watychowicz regarding service of information relating to claims (.2); work on communications with claimants regarding claims process (1.2); draft correspondence to M. Rachlis and J. Wine regarding claimants' appeal (6250 Mozart, 1131-41 79th) (.3); study issues relating to same (6250 Mozart, 1131-41 79th) (.5); exchange correspondence with J. Wine regarding communication with claimant (4611 Drexel) (.2).  Claims Administration & Objections

SUBTOTAL: [43.50      16965.00]

Status Reports

10/5/2020	KBD	0.20	Exchange correspondence with J. Wine regarding information for next status report.  Status Reports
10/12/2020	KBD	0.20	Exchange correspondence with J. Wine regarding master asset list and state court litigation.  Status Reports
10/15/2020	KBD	0.50	Study draft status report.  Status Reports
10/16/2020	KBD	1.60	Study and revise draft status report.  Status Reports
10/19/2020	KBD	1.50	Study and revise draft status report and exchange various correspondence regarding same.  Status Reports
10/20/2020	KBD	2.10	Work on status report and exchange various correspondence regarding same.  Status Reports

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
10/22/2020	KBD	0.10	Exchange correspondence with J. Wine regarding claims information for status report.  Status Reports		
10/28/2020	KBD	0.20	Exchange correspondence with J. Wine regarding status report, property sales, and timing.  Status Reports		
10/29/2020	KBD	0.40	Work on status report and exchange various correspondence regarding same.  Status Reports		
SUBTOTAL:				[ 6.80	2652.00]

Tax Issues

10/12/2020	KBD	0.20	Exchange correspondence with tax administrator regarding receivership tax return.  Tax Issues		
10/13/2020	KBD	0.30	Attention to receivership tax return and draft correspondence to K. Pritchard regarding same.  Tax Issues		
SUBTOTAL:				[ 0.50	195.00]

72.90      \$28,431.00

Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Kevin B. Duff	72.90	390.00	\$28,431.00

**SUMMARY**

Legal Services	\$28,431.00
Other Charges	\$0.00
<b>TOTAL DUE</b>	<b>\$28,431.00</b>

## Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
SUITE 900  
CHICAGO, ILLINOIS 60605

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

February 8, 2021

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.6621128

Legal Fees for the period November 2020	\$35,451.00
Expenses Disbursed	\$0.00
	<hr/>
<b>Due this Invoice</b>	<b>\$35,451.00</b>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Asset Disposition</u>			
11/2/2020	KBD	0.40	Study correspondence from real estate broker regarding sales contract (1102 Bingham) (.2); study intervenor motion to stay (7600 Kingston, 7656 Kingston, and 6949 Merrill) (.2).  Asset Disposition
11/3/2020	KBD	1.70	Work on closing documents (431 E. 42nd, 816 Marquette) (.5); exchange correspondence regarding sales of properties (7600 Kingston, 7656 Kingston, and 6949 Merrill) (.5); revise sales contract (1102 Bingham) (.7).  Asset Disposition
11/4/2020	KBD	1.40	Revise contract for sale of property (1102 Bingham) (.7); exchange correspondence and telephone conference with real estate broker regarding same (1102 Bingham) (.4); exchange correspondence with A. Porter regarding same (1102 Bingham) (.2); review correspondence regarding inquiry from buyer's lender (7237 Bennett) (.1).  Asset Disposition
11/5/2020	KBD	0.40	Exchange correspondence with A. Porter regarding potential closings of properties (6250 Mozart, 1131 E 79th, 7600 Kingston, 7656 Kingston, and 6949 Merrill) (.2); attention to closing of property sale (431 E 42nd) (.2).  Asset Disposition
11/9/2020	KBD	0.50	Exchange correspondence regarding property sales (7600 Kingston, 7656 Kingston, and 6949 Merrill) (.2); study draft response to intervenor motion to stay (7600 Kingston, 7656 Kingston, and 6949 Merrill) (.2); exchange correspondence with A. Porter regarding receipt and deposit of post-sale reconciliation payment (7201 Dorchester) (.1).  Asset Disposition
11/10/2020	KBD	2.20	Work on response to intervenor motion to stay sale of properties (7600 Kingston, 7656 Kingston, and 6949 Merrill).  Asset Disposition
11/11/2020	KBD	3.90	Work on closing documents (4315 Michigan, 4533 Calumet, 6949 Merrill, 7600 Kingston, 7656 Kingston, 7442 Calumet, 7701 Essex) (1.0); attention to deposit of funds from title company (7201 Dorchester) (.2); work on response to intervenor motion to stay sales (7600 Kingston, 7656 Kingston, and 6949 Merrill) (2.5); study correspondence from purchaser's counsel regarding demand to close sale and related correspondence (6949 Merrill) (.2).  Asset Disposition
11/15/2020	KBD	0.20	Exchange correspondence regarding sale of properties (6949 South Merrill, 7600 South Kingston, and 7656 South Kingston) and pending motion.  Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/16/2020	KBD	1.70	Confer with M. Rachlis and A. Porter regarding sale of properties (7600 Kingston, 7656 Kingston, and 6949 Merrill) (1.2); confer with SEC (.5).  Asset Disposition
11/17/2020	KBD	0.70	Work on additional closing documents and exchange correspondence with A. Porter regarding same (7600 Kingston, 7656 Kingston) (.3); exchange correspondence with A. Porter regarding pricing and allocation of sale proceeds for single family residence portfolio and title company communication (.2); attention to sales contract (1102 Bingham) (.2).  Asset Disposition
11/18/2020	KBD	2.80	Review contract for sale of property (1102 Bingham) (.2); exchange correspondence with A. Porter regarding same (1102 Bingham) (.1); confer with M. Rachlis regarding same (1102 Bingham) (.2); exchange correspondence with real estate broker regarding purchase and sale agreement (1102 Bingham) (.2); confer with A. Porter and J. Rak regarding efforts to sell properties and closings (1102 Bingham, 7600 Kingston, 7656 Kingston, 6949 Merrill) and market single family residence portfolio (.4); study and revise motion to dismiss intervenor appeal and exchange various correspondence regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill) (1.7).  Asset Disposition
11/19/2020	KBD	2.00	Exchange correspondence with real estate broker regarding purchase and sale agreement (1102 Bingham) (.2); study and revise motion to dismiss intervenor appeal and exchange various correspondence regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill) (1.5); work on bid procedures for single family residence portfolio (.3).  Asset Disposition
11/20/2020	KBD	3.50	Participate in appellate court mediation with intervenor (7600 Kingston, 7656 Kingston, 6949 Merrill) (2.8); telephone conferences with A. Porter regarding marketing of and allocation issues relating to single family residence portfolio (.3); telephone conference with real estate broker and A. Porter regarding same (.2); exchange correspondence with M. Rachlis regarding sale procedures for single family residence portfolio (.1); telephone conference with real estate broker regarding contract and marketing summary (1102 Bingham) (.1).  Asset Disposition
11/21/2020	KBD	0.20	Exchange correspondence with real estate broker and A. Porter regarding treatment of offers for single family residence portfolio.  Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
11/22/2020	KBD	2.30	Study and revise response to intervenor's motion for earnest money (7600 Kingston, 7656 Kingston, 6949 Merrill) (2.0); exchange various correspondence regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill) (.3).  Asset Disposition		
11/23/2020	KBD	2.70	Work on response to intervenor's motion for earnest money (7600 Kingston, 7656 Kingston, 6949 Merrill) (2.5); exchange correspondence regarding motion to approve sale of property (7237-43 S. Bennett) (.2).  Asset Disposition		
11/25/2020	KBD	0.20	Exchange correspondence regarding sale contract and timing for motion to approve (1102 Bingham).  Asset Disposition		
11/28/2020	KBD	0.20	Exchange correspondence with A. Porter regarding broker agreement and publication notice for sale of single-family residence portfolio.  Asset Disposition		
11/29/2020	KBD	0.30	Study and revise offering memorandum for sale of single-family residence portfolio and draft correspondence to A. Porter regarding same.  Asset Disposition		
11/30/2020	KBD	0.80	Exchange correspondence with J. Wine and title company representative regarding motion to approve sale of property (1102 Bingham) (.3); work on offering memorandum and exchange correspondence regarding same for single-family residence portfolio (.2); attention to sale of properties and intervenor appellate docketing statement (7600 Kingston, 7656 Kingston, and 6949 Merrill) (.3).  Asset Disposition		
SUBTOTAL:				[28.10	10959.00]

Business Operations

11/3/2020	KBD	0.20	Attention to payment of insurance adjuster (638 Avers).  Business Operations		
11/4/2020	KBD	0.20	Exchange correspondence with K. Pritchard regarding property manager records.  Business Operations		

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/11/2020	KBD	0.20	Exchange correspondence regarding efforts to obtain insurance settlement proceeds (638 Avers).  Business Operations
11/12/2020	KBD	0.20	Review financial and expense information from property manager regarding property expenses (638 Avers, 1409 W 109th).  Business Operations
11/13/2020	KBD	0.40	Exchange correspondence with K. Pritchard regarding property expenses (638 Avers, 1409 W 109th) (.1); study property manager financial reporting (.3).  Business Operations
11/20/2020	KBD	0.30	Exchange correspondence with E. Duff regarding potential claim relating to property (7749 Yates) (.2); exchange correspondence regarding post-sale accounting reconciliation (.1).  Business Operations
SUBTOTAL:			[ 1.50                      585.00]

Claims Administration & Objections

11/2/2020	KBD	2.90	Exchange correspondence with J. Wine regarding production of EB claim forms and EB documents (.4); study claimants' objections to tenth motion to approve sales and draft responses to same and exchange correspondence with J. Wine (4611-17 South Drexel, 6217-27 South Dorchester, 7024-32 South Paxton, 7255-57 South Euclid, 4750-52 South Indiana, 1422-24 East 68th, 2800-06 East 81st, 7840 South Yates) (1.5); attention to personal injury claim (7114 Cornell) (.1); review draft correspondence to claimants and exchange correspondence regarding same and proposed standard responses to FAQ (.7); attention to master claims list (.2).  Claims Administration & Objections
11/3/2020	KBD	1.50	Work on communication with claimants and responses to FAQ (.8); study claimants' motion for reconsideration (.1); study correspondence from J. Wine regarding and address issues relating to EB document repository (.1); study draft response to claimants' motion to stay (6250 S. Mozart and 1131-41 E. 79th) (.5).  Claims Administration & Objections
11/4/2020	KBD	5.00	Draft reply to claimants' objection to tenth sales motion (4611-17 South Drexel, 6217-27 South Dorchester, 7024-32 South Paxton, 7255-57 South Euclid, 4750-52 South Indiana, 1422-24 East 68th, 2800-06 East 81st, 7840 South Yates) (2.3); work on response to claimants' motion to stay sales pending appeal (6250 S. Mozart and 1131-41 E. 79th) (2.5); attention to claims (.2).  Claims Administration & Objections



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/5/2020	KBD	1.10	Exchange correspondence and telephone conference with M. Rachlis and J. Wine to prepare for hearing before Judge Lee on claimants' motion to stay (6250 S. Mozart and 1131-41 E. 79th) (.4); appear before Judge Lee for hearing on claimants' motion to stay (6250 S. Mozart and 1131-41 E. 79th) (.1); exchange correspondence with asset manager regarding property valuation and cash balance information (4611-17 South Drexel, 6217-27 South Dorchester, 7024-32 South Paxton, 7255-57 South Euclid, 4750-52 South Indiana, 1422-24 East 68th, 2800-06 East 81st, 7840 South Yates) (.2); exchange correspondence with K. Pritchard regarding spreadsheet for property (638 N Avers) account for lender with details regarding receipts and disbursements (.2); attention to communication with claimant and claimants' counsel (.2).  Claims Administration & Objections
11/6/2020	KBD	6.30	Attention to claimant communication regarding claim process and response to same (.2); work on reply in support of tenth sales motion and draft declaration in support (4611-17 South Drexel, 6217-27 South Dorchester, 7024-32 South Paxton, 7255-57 South Euclid, 4750-52 South Indiana, 1422-24 East 68th, 2800-06 East 81st, 7840 South Yates) (6.1).  Claims Administration & Objections
11/9/2020	KBD	2.90	Confer with M. Rachlis, J. Wine, and A. Porter regarding sale of properties (7600 Kingston, 7656 Kingston, 6751 Merrill) and related motions to stay (1.2), potential resolution of claims against properties (.3), and claims process logistics and planning (.7); work on responses to FAQ from claimants regarding claims process (.2); attention to claimant communications regarding claims (.5).  Claims Administration & Objections
11/10/2020	KBD	0.80	Attention to communications with claimants regarding claims and claims process (.6); address claim against property (1449 Talman) (.2).  Claims Administration & Objections
11/11/2020	KBD	3.60	Work on motion to dismiss claimants' appeal (1131-41 E. 79th Place and 6250 S. Mozart) (2.2); attention to claimant's counsel inquiry regarding status report (.2); work on communications with claimants and counsel (.6); study revised claims process outline and standard discovery requests (.6).  Claims Administration & Objections
11/12/2020	KBD	8.60	Work on motion to dismiss appeal (1131-41 E. 79th Place and 6250 S. Mozart) (7.4); study claimant lenders' reply in support of motion to stay (6250 S. Mozart and 1131-41 E. 79th) (.3); draft surreply in response to same (6250 S. Mozart and 1131-41 E. 79th) (.5); attention to correspondence from claimants' counsel regarding request for claim forms and documentation (.4).  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/13/2020	KBD	5.00	Review revision to surreply to claimants' motion to stay and exchange correspondence regarding same (1131-41 E. 79th Place and 6250 S. Mozart) (.3); study claimant's response (1131-41 E. 79th Place and 6250 S. Mozart) (.1); telephone conference with SEC (.4); work on motion to dismiss appeal and exchange various correspondence with M. Rachlis, J. Wine, and A. Watychowicz regarding same (1131-41 E. 79th Place and 6250 S. Mozart) (3.7); attention to claimant's counsel's inquiry (8326-58 S Ellis, 6356 S California, 6355-59 S Talman, 2736 W 64th, 7051 S Bennett, and 7957-59) (.4); draft correspondence to claimant's counsel regarding insurance proceeds and closing costs (638 N Avers) (.1).  Claims Administration & Objections
11/14/2020	KBD	5.50	Work on motion to dismiss claimants' appeal (1131-41 E. 79th Place, 6250 S Mozart).  Claims Administration & Objections
11/15/2020	KBD	3.10	Work on motion to dismiss claimants' appeal (1131-41 E. 79th Place, 6250 S Mozart).  Claims Administration & Objections
11/16/2020	KBD	3.70	Work on motion to dismiss appeal and docketing statement and various communications relating to same (1131-41 E. 79th Place and 6250 S. Mozart) (3.5); revise correspondence to claimant's counsel regarding request for information (8326-58 S Ellis, 6356 S California, 6355-59 S Talman, 2736 W 64th, 7051 S Bennett, and 7957-59 S Marquette) (.2).  Claims Administration & Objections
11/17/2020	KBD	0.30	Work on response to claimant's counsel inquiry regarding sale of property (8326-54 Ellis).  Claims Administration & Objections
11/18/2020	KBD	1.20	Attention to claimant inquiry regarding sale of property (8326-54 Ellis) (.2); confer with M. Rachlis and SEC (.5); confer with M. Rachlis regarding appellate mediation planning and motions to dismiss appeals (1131-41 E. 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.4); attention to claimant communications relating to claims (.1).  Claims Administration & Objections
11/19/2020	KBD	0.40	Attention to claimant's updated custodian information (.1); exchange correspondence with claimant's counsel regarding request for records relating to EquityBuild and communications relating to same (.3).  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
11/20/2020	KBD	1.30	Participate in appellate court mediation with lender claimants (1131 E 79th, 6250 Mozart) (.6); confer with claimant lenders' counsel, real estate broker, and A. Porter regarding marketing of and allocation issues relating to single family residence portfolio (.6); attention to claimant communication (.1).  Claims Administration & Objections		
11/23/2020	KBD	0.90	Study and revise draft response to claimants' motion for protective order (.5); attention to claimants' communications regarding claims process (.2); exchange and attention to correspondence with counsel for claimants (638 Avers, 6558 S. Vernon, 5618 S. Martin Luther King) (.2).  Claims Administration & Objections		
11/24/2020	KBD	2.90	Study and revise draft response to claimants' motion for protective order (2.4); attention to claimants' communications regarding claims process (.3); work to gather information for claimant relating to estimated closing costs for property (638 Avers) (.2).  Claims Administration & Objections		
11/25/2020	KBD	3.60	Confer and exchange correspondence with M. Rachlis and J. Wine regarding claims process logistics and planning (3.5); attention to responses to claimants (.1).  Claims Administration & Objections		
11/30/2020	KBD	0.70	Work on potential resolution of claims and exchange correspondence regarding same (.3); attention to claimant communications relating to claims process and to rollover situations (.2); review claimants' response to motion to dismiss appeal (6250 S. Mozart and 1131-41 E. 79th) (.2).  Claims Administration & Objections		
SUBTOTAL:				[61.30	23907.00]
				90.90	\$35,451.00

---

Summary of Activity

---

	<u>Hours</u>	<u>Rate</u>	
Kevin B. Duff	90.90	390.00	\$35,451.00

**SUMMARY**

Legal Services	\$35,451.00
Other Charges	\$0.00
<b>TOTAL DUE</b>	<b>\$35,451.00</b>

# Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
SUITE 900  
CHICAGO, ILLINOIS 60605

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

February 12, 2021

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.6621129

Legal Fees for the period December 2020	\$23,556.00
Expenses Disbursed	\$0.00
<b>Due this Invoice</b>	<b>\$23,556.00</b>

Date      Indiv Hours Description

---

Asset Analysis & Recovery

12/8/2020 KBD 0.20 Confer with A. Porter regarding potential claims.

Asset Analysis & Recovery

12/30/2020 KBD 0.30 Exchange correspondence regarding potential asset.

Asset Analysis & Recovery

12/31/2020 KBD 0.20 Exchange correspondence regarding potential asset.

Asset Analysis & Recovery

SUBTOTAL:

[ 0.70                      273.00]

Asset Disposition

---

12/1/2020 KBD 0.30 Exchange regarding communication from title company escrow officer regarding earnest money (1102 Bingham) (.1); correspondence regarding notice of sales (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2).

Asset Disposition

12/2/2020 KBD 0.60 Review and execute affidavit and exchange correspondence with A. Porter regarding same (7600 Kingston, 7656 Kingston) (.2); exchange correspondence with J. Rak and telephone conference with title company representative regarding sale proceeds (4317 S. Michigan) (.1); draft and exchange correspondence regarding notice of sales (7600 Kingston, 7656 Kingston, 6949 Merrill) (.3).

Asset Disposition

12/3/2020 KBD 0.30 Exchange correspondence regarding notice of property sales and filing of same (7600 Kingston, 7656 Kingston, 6949 Merrill).

Asset Disposition

12/4/2020 KBD 0.50 Study intervenor emergency motion to vacate sales (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2); telephone conference with real estate broker regarding various remaining properties and related sales issues (.3).

Asset Disposition

12/6/2020 KBD 1.30 Study, revise, and exchange correspondence regarding response to intervenor emergency motion (7600 Kingston, 7656 Kingston, 6949Merrill).

Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/7/2020	KBD	1.60	Study, revise, and exchange correspondence regarding response to intervenor emergency motion (7600 Kingston, 7656 Kingston, 6949Merrill).  Asset Disposition
12/8/2020	KBD	0.40	Telephone conference with A. Porter regarding sale of properties, property management, and various related issues (7237 Bennett, 1131 79th St., 6250 Mozart, 638 Avers).  Asset Disposition
12/10/2020	KBD	1.20	Study and revise 11th sales motion and exchange various correspondence regarding same (7237 Bennett) (.4); telephone conference and exchange correspondence with real estate broker regarding property repair estimates (7237 Bennett) (.3); work on intervenor appeal (7600 Kingston, 7656 Kingston, 6949 Merrill) (.3); exchange correspondence regarding water bill issue (4533 S. Calumet) (.2).  Asset Disposition
12/11/2020	KBD	0.30	Work on eleventh sales motion (7237 Bennett) (.1); address issues relating to intervenor appeal and sale of properties (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2).  Asset Disposition
12/13/2020	KBD	1.20	Study and revise consolidated 11th motion to approve sale of property (7237 Bennett) and for post-sale reimbursement of expenses (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel).  Asset Disposition
12/14/2020	KBD	0.20	Exchange correspondence regarding revisions to 11th motion to confirm sale and proposed order (7237 Bennett).  Asset Disposition
12/16/2020	KBD	0.20	Exchange correspondence regarding selling entity EIN (6250 Mozart).  Asset Disposition
12/22/2020	KBD	1.00	Review and execute closing documents and confer with J. Rak and A. Watychowicz regarding same (1131 E. 79th, 6250 Mozart) (.6); exchange correspondence regarding water bill issue for closed property (4533 Calumet) (.1); exchange correspondence with A. Porter regarding sale of property (1102 Bingham) (.1); exchange correspondence regarding final reporting and distribution for property (3074 Cheltenham) (.2).  Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/29/2020	KBD	0.30	Exchange correspondence regarding publication of notice for sale of single family residence portfolio (.2); study opposition to sale motion (7237 Bennett) (.1).  Asset Disposition
12/30/2020	KBD	0.30	Exchange correspondence with A. Porter regarding checks from title company (431 E 42nd Pl.) (.2); exchange correspondence with A. Porter regarding sale of property (1102 Bingham) (.1).  Asset Disposition

SUBTOTAL:

[ 9.70                      3783.00]

Business Operations

12/3/2020	KBD	0.20	Confer with J. Wine regarding funds restoration issues.  Business Operations
12/9/2020	KBD	0.90	Confer with A. Porter and J. Wine regarding state court actions, administrative actions, and sales issues (7237 Bennett, 638 Avers)(.6); work on motion to pay expenses (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd Place, 4520 S. Drexel) (.3).  Business Operations
12/10/2020	KBD	0.40	Work on motion to pay expenses (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd Place, 4520 S. Drexel).  Business Operations
12/17/2020	KBD	0.20	Draft correspondence to property manager regarding property expenses (638 Avers).  Business Operations
12/21/2020	KBD	0.20	Attention to property expenses and exchange various correspondence regarding same (1401 W 109th).  Business Operations
12/22/2020	KBD	0.20	Exchange correspondence regarding notice and potential claim relating to property (1516 E 85th Place).  Business Operations
12/23/2020	KBD	0.40	Attention to payment of property expenses (1401 W 109th, 4533 S Calumet).  Business Operations



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/28/2020	KBD	0.20	Attention to notices regarding properties (5618 S. MLK, 2129 W 71st).  Business Operations

SUBTOTAL: [ 2.70 1053.00]

Claims Administration & Objections

12/1/2020	KBD	0.70	Attention to communication with claimant (.2); work on rollover claims analysis and related issues (.3); exchange correspondence regarding communication with claimants' counsel and vendor costs (.2).  Claims Administration & Objections
12/3/2020	KBD	1.80	Work on claims review and planning issues with J. Wine (.4); telephone conference with J. Wine regarding production of investor records (.2); confer with investors' counsel and M. Rachlis regarding claims process and procedural history (.9); attention to claimant communications (.3).  Claims Administration & Objections
12/4/2020	KBD	1.60	Work on claims process for status report and exchange correspondence with J. Wine and M. Rachlis regarding same (.8); study and revise draft responses to claimants (.3); telephone conference with SEC (.5).  Claims Administration & Objections
12/6/2020	KBD	5.20	Study and revise reply in support of motion to dismiss claimants' appeal (1131 E 79th, 6250 Mozart).  Claims Administration & Objections
12/7/2020	KBD	5.10	Study and revise reply in support of motion to dismiss claimants' appeal (1131 E 79th, 6250 Mozart) and exchange various correspondence regarding same (4.9); attention to communication with claimant and claimant's counsel (.2).  Claims Administration & Objections
12/8/2020	KBD	0.40	Exchange correspondence regarding notice of hearing (.2); attention to collection notice and potential claim (.1); work on response to claimant (.1).  Claims Administration & Objections
12/9/2020	KBD	0.50	Exchange correspondence regarding notice and potential claim (.1); attention to inquiry from claimant (6949 Merrill) (.1); exchange correspondence with J. Wine regarding communications with claimant counsel regarding dispute resolution procedures (.1); study information

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			regarding claims against properties in single family residence portfolio (.2).  Claims Administration & Objections
12/10/2020	KBD	0.40	Work on response to claimant inquiry (7750 S Muskegon) (.2); attention to inquiry from claimant counsel regarding real estate tax notice and exchange correspondence regarding same (431 E 42nd) (.2).  Claims Administration & Objections
12/11/2020	KBD	2.50	Work on responses to claimants (.5); work with M. Rachlis and J. Wine on on claims process and various related issues (2.0).  Claims Administration & Objections
12/14/2020	KBD	2.50	Work with M. Rachlis and J. Wine regarding claims process, tranches, protective order, claims process outline, and status report (1.8); study proposed tranche grouping and exchange correspondence with M. Rachlis and J. Wine regarding same (.3); attention to claimant communications (.3); draft correspondence to claimant's counsel regarding notice of tax sale (431 E. 42nd Pl.) (.1).  Claims Administration & Objections
12/15/2020	KBD	2.60	Study, revise, and exchange various correspondence relating to multiple drafts of joint status report, claims process, and standard written discovery (1.5); confer with M. Rachlis and J. Wine regarding same (.5); work on communication to claimants regarding claims process (.2); work on response to claimants (.2); exchange correspondence with J. Rak regarding extension of agreement and draft correspondence to claimant's counsel regarding same (638 Avers) (.1); study claimants' counsel's letter to Judge Lee (.1).  Claims Administration & Objections
12/16/2020	KBD	2.90	Exchange correspondence regarding claims process discussions between participants and various related issues (.8); exchange correspondence regarding communication with claimant regarding claims issues (.2); telephone conference with SEC (.2); confer with J. Wine regarding various claims process issues (.4); study revised joint status report, revised claim procedures, and revised standard written discovery and exchange correspondence with J. Wine regarding same (1.0); draft correspondence regarding communication from claimant's spouse (.2); exchange correspondence regarding claimant communication (.1).  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/17/2020	KBD	4.60	Prepare for hearing before Judge Lee (1.7); confer with SEC (.5); appear before Judge Lee for hearing (.9); work on insurance claim, property expenses, accounting, and estimated closing costs for property (638 Avers) (1.2); draft correspondence regarding claimant inquiries (.3).  Claims Administration & Objections
12/18/2020	KBD	4.00	Work on proposed order regarding claims and EquityBuild documents and study and exchange various correspondence regarding same (.5); work on property expenses, accounting, and estimated closing costs for property (638 Avers) (2.0); exchange various correspondence regarding estimated closing costs (638 Avers) (1.5); study and revise draft order and work on same with J. Wine.  Claims Administration & Objections
12/20/2020	KBD	0.20	Study correspondence regarding property expenses, accounting, and estimated closing costs for property (638 Avers).  Claims Administration & Objections
12/21/2020	KBD	2.50	Work with A. Porter regarding analysis for estimated closing costs, accounting of funds and expenses, and potential credit bid (638 Avers) (.5); separate analysis of mortgage claims and allocation of costs (638 Avers) (1.1); follow up conversation with A. Porter regarding same (638 Avers) (.2); telephone conference with SEC (.3); attention to claimant communications (.2); exchange correspondence with J. Wine regarding proposed order and proposed claimsprocess outline (.2).  Claims Administration & Objections
12/22/2020	KBD	1.50	Study and revise proposed order relating to claims and EB documents and exchange correspondence regarding same (.4); study and revise correspondence regarding potential claim (638 Avers) (.1); work on estimated closing costs, property expenses, and accounting information for property and draft correspondence to claimant's counsel regarding same (638 Avers) (.3); revise correspondence to claimant's counsel (6437-41 S Kenwood Avenue, 8100 S Essex Avenue, 701-13 S 5th Avenue, 7508 S Essex Avenue) (.2); attention to claimant correspondence and request for claims documentation (.3); exchange correspondence regarding notice and potential claim relating to property (1516 E 85th Place) (.2).  Claims Administration & Objections
12/23/2020	KBD	0.70	Exchange correspondence with M. Rachlis and J. Wine regarding production of EB documents and claims documentation to claimants (.3); draft correspondence to claimant regarding requested claims information(.4).  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/24/2020	KBD	1.10	Study proposed changes to claims process motion and confer with M. Rachlis and J. Wine regarding same.  Claims Administration & Objections
12/28/2020	KBD	2.60	Work on claims review and claims process (2.4); exchange correspondence regarding potential claim (.1); attention to communication from claimant (.1).  Claims Administration & Objections
12/29/2020	KBD	3.20	Work on claims review and claims process (1.7); study and revise claims processoutline for court (1.5).  Claims Administration & Objections
12/30/2020	KBD	0.50	Study claims process outline and exchange various correspondence regarding same.  Claims Administration & Objections
12/31/2020	KBD	0.20	Exchange correspondence regarding claimant communications.  Claims Administration & Objections

SUBTOTAL: [47.30      18447.00]

60.40      \$23,556.00

Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Kevin B. Duff	60.40	390.00	\$23,556.00

**SUMMARY**

Legal Services	\$23,556.00
Other Charges	\$0.00
<b>TOTAL DUE</b>	<b>\$23,556.00</b>

# **EXHIBIT G**

## Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
SUITE 900  
CHICAGO, ILLINOIS 60605

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

February 8, 2021

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.6622127

Legal Fees for the period October 2020	\$97,469.00
Expenses Disbursed	\$793.03
<b>Due this Invoice</b>	<b>\$98,262.03</b>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
<u>Accounting/Auditing</u>					
10/7/2020	KMP	1.30	Study statements for all Receivership estate accounts.		
			Accounting/Auditing		
SUBTOTAL:				[ 1.30	182.00]
<u>Asset Analysis &amp; Recovery</u>					
10/27/2020	JR	1.40	Work with E. Duff and accounting firm on June, July, August and September reporting.		
			Asset Analysis & Recovery		
SUBTOTAL:				[ 1.40	196.00]
<u>Asset Disposition</u>					
10/1/2020	AEP	0.60	Teleconference with K. Duff and receivership broker regarding strategy for responding to prospective purchasers' requests for credits (7201 S Dorchester) and alleged damage to receivership property (7237 S Bennett) (.4); prepare e-mail to counsel for prospective purchaser of receivership property regarding closing credit offer and consequences of rejection of same (.2).		
			Asset Disposition		
	MR	0.50	Attention to issues on tenth motion for sales (.3); conference with K. Duff and J. Wine regarding issues on property sales (7201 Dorchester and 7237 Bennett) (.1); attention to issues on property disposition with K. Duff and J. Wine (7201 S. Dorchester and 7237 S. Bennett) (.1).		
			Asset Disposition		
	JR	6.50	Update property tax reports regarding payments and remaining balances for institutional lenders (.7); exchange correspondence with K. Duff regarding status of post-closing reconciliation for property (7110 S. Cornell) (.1); review email from J. Wine regarding request for production of closing documents post-closing (7201 S. Constance) and provide same (.1); further review of May financial reporting (3.3); draft closing checklist for property with critical information for property (7442 S. Calumet) (.4); draft closing checklist for property with critical information (7442 S. Calumet) (.4); draft closing checklist for property with critical information (6217 S. Dorchester) (.4); draft closing checklist for property with critical information (4317 S. Michigan) (.4); draft closing checklist for property with critical information (7255 S. Euclid) (.4); exchange correspondence with the appraisal company regarding appraisal inspection (2800 E. 81st) (.1); exchange correspondence with property management requesting coordination of same (2800 E. 81st) (.1); exchange correspondence with property management requesting updated due diligence documents for properties (4317 S. Michigan and 7255 S. Euclid) (.1).		



Date	Indiv	Hours	Description
			Asset Disposition
10/2/2020	MR	0.40	Further attention to tenth sales motion.
			Asset Disposition
	JR	4.80	Review email from the title company water department regarding water application (5618 Martin Luther King) (.1); update property folder and exchange correspondence with A. Porter regarding same (5618 S. Martin Luther King) (.1); exchange correspondence with the title company requesting water ledger regarding same, review and update electronic file (5618 Martin Luther King) (.2); review email from property manager inquiring about permission to provide buyer with property financial documents related to closing (4611 S. Drexel) (.1); review email from property management requesting buyer information related to sold properties and provide same (6356 S. California, 2736 W. 64th, 6355 S. Talman, 5618 S. MLK) (.1); review subsidy contracts and update electronic files in anticipation of closing for property (1700 Juneway) (1.2); exchange correspondence with buyer's counsel regarding same (1700 Juneway) (.1); exchange correspondence with leasing manager requesting missing subsidy agreements related to property (1700 Juneway) (.1); exchange correspondence with property management requesting updates to property information in preparation for closing (7201 S Dorchester) (.1); update closing documents in preparation for closing (1700 Juneway) (2.6); exchange correspondence with buyer's counsel requesting review and approval of notice to tenant letters for property in preparation for closing (7201 S. Dorchester) (.1)...cont'd
			Asset Disposition
	JR	2.40	Draft closing checklist with crucial property information in preparation for closing (7701 S. Essex) (.7); draft water application in anticipation of closings (1422 E. 68th) (.2); draft water application in anticipation of closings (7255 S. Euclid) (.2); draft water application in anticipation of closings (4317 S. Michigan) (.2); draft water application in anticipation of closings (6217 S. Dorchester) (.2); draft water application in anticipation of closings (4611 S. Drexel) (.2); draft water application in anticipation of closings (7442 S. Calumet) (.2); draft water application in anticipation of closings (7701 S. Essex) (.2); draft water application in anticipation of closings (2800 E. 81st) (.3).
			Asset Disposition
10/4/2020	MR	0.60	Review and follow up on draft tenth sales motion.
			Asset Disposition
10/5/2020	JRW	0.90	Review and revise 10th motion to confirm sales (.1); related communications with A. Watychowicz and K. Duff regarding service upon claimants by mail (.1) and with K. Pritchard regarding notice of motion (.1); prepare publication notice (.6).
			Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/5/2020	JR	4.30	Review email from J. Wine and provide requested closing update related to property (7109 S. Calumet) (.1); review email from K. Duff regarding appraisal information for property (2800 E 81st) and provide appraisal information to property management regarding same (.1); follow up correspondence with property management regarding buyer request for subsidy documentation related to property (1700 Juneway) (.1); further communication with buyer's counsel regarding same (1700 Juneway) (.1); review email from buyer's counsel regarding approval related to notice to tenants and update same (7201 S. Dorchester) (.7); review updated rent roll delinquency report and leases and update certified rent roll in anticipation of closing (7201 S Dorchester) (1.2); exchange communication with broker and provide requested survey for property (7701 S. Essex) (.1); exchange communication with buyer and request lender information and title related information for purchase of properties (7701 S. Essex and 7442 S. Calumet) (.2); draft water application in anticipation of closings (4533 S. Calumet) (.2); draft water application in anticipation of closings (4750 S. Indiana) (.2); draft water application in anticipation of closings (7024 S. Paxton) (.2); draft water application in anticipation of closings (7840 S. Yates) (.2); review email from E. Duff related to May financial reports and correct discrepancies (.9).
			Asset Disposition
	KMP	2.00	Prepare exhibits and notice for tenth motion to confirm sales (.6); finalize motion and related documents and file same with court (.4); serve on defendant and all investors and claimants (1.0).
			Asset Disposition
10/6/2020	KMP	0.40	Prepare form for wire transfer to title company for payment of water bill to facilitate closing on property (5618 King Drive), and communications with K. Duff, A. Porter, title company representative, and bank representatives regarding same.
			Asset Disposition
	AEP	1.30	Review revised title commitment on receivership property (7024 S Paxton) and update closing checklist (.1); teleconference with escrow agent regarding water charges due upon purchase of transfer stamps for receivership property (5618 S King) (.1), teleconference with K. Duff regarding closing (.1), and preparation of e-mail to K. Pritchard regarding wire transfer of funds to title company (.1); teleconference with receivership broker regarding negotiations with prospective purchaser of receivership property (7201 S Dorchester) (.2); read e-mail from J. Wine regarding status of inspections of receivership properties continued for housing court hearings on 10/08 (7201 S Constance, 7600 S Kingston, 638 N Avers, and 7237 S Bennett), review orders, and prepare e-mail to counsel for purchaser of receivership property (7201 S Constance) regarding coordination of efforts to obtain additional extension of time (.3); review release received in connection with payment of judgment recorded against receivership property (7024 S Paxton), research public records to find original judgment order, and prepare email to title

Date	Indiv	Hours	Description
			underwriter regarding guidance on recording of release and update to title commitment (.2); teleconference with adjuster regarding final inspection of former receivership property (7943 S Essex) for purpose of closing insurance claim and prepare e-mail to buyer regarding same (.2).
			Asset Disposition
10/6/2020	JRW	0.20	Correspondence from A. Porter to buyer of property (7201 S Constance) regarding inspection in housing court matter (.1); correspond with A. Porter and J. Rak regarding release of lien (7024 S Paxton and 7114 S Cornell) (.1).
			Asset Disposition
	JR	5.60	Review email from property management regarding production of owner statement to lender for property and follow up correspondence with A. Porter regarding same (4611 Drexel) (.1); review post-closing reconciliation report and update electronic files for all closed properties (.4); request same from property management (.2); review email from property management regarding an incident report and an attorney letter related to a tenant incident at property (7110 S. Cornell) (.2); exchange correspondence with A. Porter and K. Duff regarding same (7110 S. Cornell) (.1); exchange correspondence with K. Pritchard regarding confirmation of payment of Houston property taxes (1102 Bingham) (.1); review email from A. Porter regarding scheduling of closings (1700 Juneway, 7201 Dorchester, 7508 Essex and 6558 Vernon) (.2); follow up correspondence with A. Porter regarding requested property subsidy information for property (1700 Juneway) (.1); further correspondence with A. Porter advising on expiration of water certificate applications for properties (1700 Juneway, 7201 Dorchester, 7508 Essex and 6558 Vernon) (.2); update closing checklist regarding closing confirmation (1700 Juneway) (.1); update closing documents in preparation for closing (1700 Juneway) (1.1); exchange correspondence with property management requesting updated financial property reports for closing (1700 Juneway) (.1); review leases, subsidy contracts and update certified rent roll in preparation for closing (1700 Juneway) (2.5); review email from K. Duff regarding incident at property (7110 Cornell) and respond accordingly (.1); exchange correspondence with buyer's counsel producing requested updated rent roll in anticipation of closing (1700 Juneway) (.1).
			Asset Disposition
10/7/2020	AEP	1.60	Prepare letter to counsel for purchaser of receivership property (1700 W Juneway) scheduling closing date (.2) and numerous ensuing communications with counsel for purchaser regarding legitimacy of receivership invocation of default for failure to close and alleged obligation to produce additional CHA subsidy-related materials (.2); prepare letter to counsel for purchaser of receivership property (7508 S Essex) scheduling closing date (.2); exchange correspondence with J. Wine regarding status of proceedings in administrative actions, update affected buyers' counsel accordingly (.3), read clarifying e-mail from J. Wine and update affected buyers' counsel accordingly (.3); prepare e-mail to receivership team regarding status of closings, stalled sales, and future marketing on all remaining receivership properties and additional issues to be resolved (.4).
			Asset Disposition

Date	Indiv	Hours	Description
10/8/2020	JR	5.90	<p>Review emails from the title company scheduling department and update files related to closing confirmation of upcoming closings (1700 Juneway, 7201 Dorchester and 6558 Vernon) (.1); review emails from A. Porter regarding pending administrative court actions (.1); finalize closing documents regarding property (7201 Dorchester) (1.2); finalize closing documents regarding property (1700 Juneway) (.4); finalize closing documents regarding property (6558 S. Vernon) (1.4); review email from E. Duff related to May financial reporting and provide requested information (.5); update notice letter to tenants of property (1700 Juneway) (.7); exchange correspondence with buyer's counsel regarding same (1700 Juneway) (.1); update certified rent roll for property (1700 Juneway) (.8); exchange correspondence with property management requesting missing leases in preparation for closing (.2); update notice letter to tenant of property (6558 Vernon) (.3); exchange correspondence with buyer's counsel requesting confirmation of same (6558 Vernon) (.1).</p> <p>Asset Disposition</p>
10/9/2020	AEP	1.70	<p>Communications with counsel for purchaser of receivership property (7508 S Essex) regarding request for continuance of closing (.1); read e-mail from title underwriter regarding status of recording of release of judgment associated with former receivership property (7748 S Essex), research same, and prepare response to inquiry (.2); research judgments entered against SSDF7 Portfolio 1 properties (7508 S Essex and 7957 S Marquette) for which title indemnities remain outstanding and prepare e-mail to corporation counsel and title company regarding status of payment of same (.3); read e-mail from counsel for purchaser of receivership property (4611 S Drexel) regarding existence of aboveground storage tank, research EquityBuild files and prepare response (.2); read e-mail from counsel for purchaser of receivership property (4611 S Drexel) regarding alleged open violations, research pleadings files, and prepare e-mail to property manager regarding status of alleged continuing violations (.3); read e-mails from counsel for purchaser of receivership property (6250 S Mozart) regarding status of rooftop and commercial tenancies at property, research rent roll and other files for clarifying information, and prepare e-mail to property manager requesting information regarding status of same (.3); read e-mail from corporation counsel regarding status of payment of judgments against SSDF7 Portfolio 1 properties (7508 S Essex and 7957 S Marquette), research public records for evidence of recording of same, and prepare e-mail to title underwriter requesting disbursement of funds held back from closing of receivership property (7748 S Essex) (.3).</p> <p>Asset Disposition</p>
	JR	4.60	<p>Review email from A. Porter requesting to submit water application due to expiration prior to closing (7508 S. Essex) (.1); update closing checklist related to closing date for same (7508 S. Essex) (.1); exchange correspondence with the title company requesting to process water application in preparation for closing (7508 S. Essex) (.1); review email from buyer's management company requesting modifications to tenant notices related to closing (6558 S. Vernon) (.2); exchange correspondence with A. Porter regarding same (7508 S. Essex) (.1); update notice letter to tenants</p>

Date	Indiv	Hours	Description
			<p>regarding same (6558 S. Vernon) (.6); review leases and subsidy contracts and update certified rent roll in anticipation of closing (7508 S. Essex) (1.2); exchange correspondence with property management requesting missing items related to same and request additional property financial reports (7508 S. Essex) (.2); review email from broker and provide requested surveys for properties (7024 S. Paxton, 4750 S. Indiana and 1422 E 68th) (.1); review email from leasing manager, review requested leases, update electronic files and update certified rent roll regarding property in anticipation for closing (1700 Juneway) (.7); follow up correspondence with buyer's counsel (A. Jotkus) regarding buyer requested information for closing (7508 S. Essex) (.2); update closing checklist regarding same (7508 S. Essex) (.1); update rent roll regarding same (7508 S Essex) (.6); update electronic files and update notices to tenants regarding same (7508 S Essex) (.3).</p> <p>Asset Disposition</p>
10/10/2020	AEP	7.50	<p>Review and revise all closing figures, closing documents, and associated lien waivers in connection with closing of receivership property (1700 W Juneway) (1.3); review and revise all closing figures, closing documents, and associated lien waivers in connection with closing of receivership property (6558 S Vernon) (1.1); review and revise all closing figures, closing documents, and associated lien waivers in connection with closing of receivership property (7201 S Dorchester) (1.0); research EquityBuild files for information relating to receivership property (7508 S Essex), read all correspondence relating to history of housing court proceedings and efforts to cure violations, and prepare e-mail memorandum to K. Duff (1.5); review closing checklist for receivership property (7508 S Essex), update same consistent with new nominee and management company information received from buyer, order revised survey for inclusion of additional certification parties, and request revised title commitment with disclosure of lis pendens (.4); (cont'd in next entry).</p> <p>Asset Disposition</p>
	AEP		<p>(Cont'd from previous entry) Research EquityBuild files for information relating to claims by management company in connection with pre-receivership claims on receivership property (7237 S Bennett), review e-mails regarding additional amounts allegedly due, review pleadings associated with housing court action, review title commitment, review closing checklist, and review proof of claim submitted by property manager, and prepare e-mail to title underwriter requesting approval of proposed order confirming sale free and clear of property manager lien waiver, prepare e-mail to title company requesting revisions to title commitment and copies of special exception documents, and prepare e-mail to buyer's counsel regarding need for lender information, status of housing court proceedings, and anticipated path forward (2.2).</p> <p>Asset Disposition</p>
10/12/2020	AEP	3.30	<p>Teleconference with K. Duff, M. Rachlis, and receivership broker regarding receivership property sales (7109 S Calumet) (1.2), (638 N Avers) (.3), (7237 S Bennett) (.4), and (7508 S Essex) (.3); review releases of mortgage and</p>

Date	Indiv	Hours	Description
			assignment of rents received in connection with former receivership property (6356 S California) and forward same to title underwriters for recording (.1); review updated title commitment for receivership property (7508 S Essex) and provide comments regarding lis pendens to title underwriter (.1); review updated title commitment for receivership property (7024 S Paxton), search records for evidence of judgment orders and releases associated with administrative actions added to title commitment, and prepare e-mails to title underwriter and J. Wine regarding existence of original releases (.2); finalize closing figures for receivership properties (6554 S Vernon, 1700 W Juneway, and 7201 S Dorchester) and transmit same to title officer (.3); additional e-mails with counsel for FannieMae and J. Rak regarding receipt and recording of releases associated with conveyance of former receivership property (6356 S California) (.1); read and respond to e-mail from title underwriter regarding proposed language of order allowing EquityBuild to convey receivership property (7237 S Bennett) free and clear of property manager liens (.2); review amended survey on receivership property (6554 S Vernon) and transmit proposed modifications to surveyor (.1).
			Asset Disposition
10/12/2020	JRW	0.40	Exchange correspondence with A. Porter, K. Duff and brokers regarding injunction against property (7508 S Essex).
			Asset Disposition
	MR	1.50	Attention to (638 Avers) (.3) and (7109 Calumet) (1.2) property issues with broker, A. Porter, K. Duff.
			Asset Disposition
	JR	4.60	Final review of lien waivers and notices to tenants in preparation for signing (1700 Juneway, 7201 Dorchester 6558 Vernon) (.5); forward same to property management (1700 Juneway, 7201 Dorchester, 6558 Vernon) (.1); final review of broker lien waivers and forward for signature to broker (1700 Juneway, 7201 Dorchester and 6558 Vernon) (.3); review and request updated commission statement from broker (7508 S. Essex) (.2); exchange correspondence with A. Porter and K. Duff regarding upcoming execution of documents related to closings (1700 Juneway, 7201 Dorchester, 6558 Vernon, 7508 S. Essex) (.2); review email from buyer related to requested buyer information and update closing checklist regarding same for properties (4750 S. Indiana and 7024 Paxton) (.3); update power of attorneys for upcoming closings (1700 Juneway, 7201 Dorchester, 6558 Vernon, 7508 S. Essex) (.2); exchange communication with firm regarding same (1700 Juneway, 7201 Dorchester, 6558 Vernon and 7508 S. Essex) (.1); complete tax transfer declaration for property in preparation for closing (6558 S. Vernon) (.5); review closing figures regarding same (6558 S. Vernon) (.2); review most recent rent roll regarding same related to security deposits (6558 S. Vernon) (.1); exchange correspondence with property management requesting confirmation of no security deposits held for tenants related to property (6558 S. Vernon) (.1); final review of closing documents in preparation for signing and closing (6558 S. Vernon) (.3); prepare transfer tax declaration for property (1700 Juneway) (.6); final review of closing

Date	Indiv	Hours	Description
			documents (1700 Juneway) (.5); review security deposits for property and update certified rent roll (1700 Juneway) (.2); exchange correspondence with property management regarding same (1700 Juneway) (.1); final review of closing documents (7201 S Dorchester) (.1).
			Asset Disposition
10/13/2020	AEP	0.30	Read e-mails from receivership broker regarding communications with prospective purchaser of receivership property (7508 S Essex) concerning outstanding housing court action and prepare e-mail to counsel for purchaser explaining status of compliance with dismissal order, requesting loan amount, attaching updated survey, and providing other closing-related information.
			Asset Disposition
	JR	6.80	Review emails and save revised surveys to files for properties (7508 S. Essex and 6558 S. Vernon) (.1); review email from property management and provide requested settlement statement from previously sold property (8107 S. Ellis) (.1); review email from broker and provide requested survey for property (7701 S. Essex) (.1); follow up correspondence with property management regarding post-closing reconciliation funds for closed properties (.1); update post-closing reconciliation reports related to all closed properties (.6); draft tenants address labels for notices to tenants for upcoming closings (1700 Juneway, 6558 Vernon, 7201 Dorchester and 7508 S. Essex) (1.1); draft transfer tax declaration form for property in preparation for closing (7508 S. Essex) (.3); draft closing documents for future closings (4750 S. Indiana, 7024 S. Paxton) (4.1); review email from buyer's counsel regarding request to produce prorations for upcoming closings and respond accordingly (.3).
			Asset Disposition
10/14/2020	AEP	2.30	Continue reviewing due diligence folders for single-family homes, updating due diligence checklist, reconciling title commitment exceptions to EquityBuild records, and preparing bid procedures to govern submission of offers and selection of winning bidder.
			Asset Disposition
	AW	0.80	Work with K. Duff and J. Rak on finalization of closing documents for four properties (7508 S. Essex, 1700 Juneway, 6558 S. Vernon and 6217 S. Dorchester).
			Asset Disposition
	JR	5.90	Prepare closing documents for execution by K. Duff (1700 Juneway, 7201 Dorchester, 6558 Vernon and 7508 S. Essex) (1.2); meeting with A. Watychowicz and K. Duff regarding same (1700 Juneway, 7201 Dorchester, 6558 Vernon and 7508 S. Essex) (.8); prepare notice to tenant letter in preparation for notification of sale of properties (1700 Juneway, 7201 Dorchester, 6558 Vernon and 7508 S. Essex) (1.5); exchange correspondence with buyer's counsel regarding rent and water prorations for upcoming closing (6558 S. Vernon) (.2); request property reports from property management regarding same (6558 S. Vernon) (.1); prepare

Date	Indiv	Hours	Description
------	-------	-------	-------------

reports for production to buyer's counsel (6448 S. Vernon) (.8); exchange communication with K. Duff related to a request to prepare an addendum, draft and forward to K. Duff for property (638 N. Avers) (.1); review email from buyer's counsel requesting updated title commitment and invoice, prepare and produce related to property (1700 Juneway) (.1); review notice for previously sold property and produce to buyer (701 S. 5th) (.1); provide buyer's counsel with requested information related to property regarding tenant information in preparation for sale (1700 Juneway) (.2); communication with K. Duff, A. Porter and accountant regarding W-9 form needed for completion of previously sold property (7300 S. St. Lawrence) (.1); review deed for closing (1700 Juneway) (.1); request property reports from property management in preparation of closing (1700 Juneway) (.1); update certified rent roll regarding same (1700 Juneway) (.5).

Asset Disposition

10/15/2020	AEP	5.30	<p>Research EIN for EB South Chicago 3, complete new Form W-9, and transmit same to J. Rak with instructions on finalization and submission (.1); review updated survey and title commitment for receivership property (7508 S Essex), research and confirm property tax payment status, and transmit additional changes to title insurer (.2); review proposed first amendment to purchase and sale agreement relating to receivership property (7508 S Essex), prepare revisions thereto, and return same to purchaser's counsel (.2); review draft rent roll for receivership property (6554 S Vernon), make appropriate revisions, and update settlement statement with buyer credits (.2); teleconference with counsel for purchaser of receivership properties (7600 S Kingston, 7656 S Kingston, 1131 E 79th, and 6250 S Mozart) regarding anticipated timing of rulings on remaining objections to eighth and ninth motions to confirm sales (.2); review judgment order associated with receivership property (6356 S California) and respond to J. Wine regarding status of payment and recording of same (.1); correspondence with J. Wine regarding need for payoff of judgment against receivership property (7024 S Paxton) and need for release of lien (.1); read through all title exceptions and create master list of items needed from City of Chicago and prior encumbrances to ensure conveyance of clean title at closing (1.4); review all building code violation folders to identify all potential judgments pending against single-family homes (.8); review and analyze title histories on all properties subject to title exceptions and create chain of title explanations for use with title underwriter (2.0).</p>
------------	-----	------	--

Asset Disposition

	JR	6.00	<p>Follow up correspondence with property management requesting current property reports for closing (6558 S. Vernon) (.1); review same and update certified rent roll for closing (6558 S. Vernon) (.6); exchange correspondence with A. Porter regarding same (6558 S. Vernon) (.3); follow up correspondence with the title company water department regarding status of water applications for upcoming closing (7508 S. Essex) (.1); update property prorations for upcoming closing (1700 Juneway) (.8); attend closing (6558 S. Vernon) (3.5); exchange correspondence with all parties notifying of closing (6558 S. Vernon) (.2); update electronic files regarding same (6558 S. Vernon) (.4).</p>
--	----	------	--

Asset Disposition



Date	Indiv	Hours	Description
10/16/2020	AEP	1.00	Teleconference with K. Duff and J. Rak regarding continuance in closing of receivership property (.2), issues associated with single-family home judgments and encumbrances (.5), property tax issues (.1), and status of preparation for closing of tenth tranche of properties (.2).  Asset Disposition
	JRW	0.10	Confer with K. Duff regarding publication notice for single family home portfolio.  Asset Disposition
	JR	1.40	Work with A. Porter and K. Duff on planning for listing single family portfolio and title exception and insurance issues (.6), closing planning for property (1700 Juneway) (.1), purchase offer on property (1102 Bingham) (.1) and property manager liens and expenses (.2); review tax balances for single family homes (.4).  Asset Disposition
10/19/2020	AEP	0.90	Review all e-mails pertaining to receivership property (1102 Bingham), read marketing materials and status updates, review purchase and sale contract and provide comments regarding same to K. Duff.  Asset Disposition
	JR	5.10	Review email from property management and provide closing details of property (7508 S. Essex) (.1); further correspondence with property management requesting property information for closing (7508 S. Essex) (.1); update notice to tenant letters regarding rescheduled closing (1700 Juneway) (.6); telephone call to the Cook County clerk's office regarding information related to the estimate of redemption for property (431 E. 42nd) (.4); exchange correspondence with A. Porter regarding same (431 E. 42nd) (.1); update transfer tax declaration for property (1700 Juneway) (.2); review ledgers and delinquency report and update rent roll regarding same (1700 Juneway) (.9); review single family home due diligence folders and organize in preparation of sharing with interested buyers (2.7).  Asset Disposition
10/20/2020	KMP	0.20	Review online bank records to confirm deposits of proceeds from sales of properties (7201 S Dorchester, 1700 Juneway) and communicate with K. Duff and J. Rak regarding same.  Asset Disposition
	AEP	3.70	Correspondence with prospective purchaser of receivership property and title underwriter regarding deletion of unrecorded lease exceptions pertaining to receivership property (1700 W Juneway) based on tenant subordination agreements (.2); correspondence with purchaser's lender and title company regarding identification of nominee and loan amount in connection with receivership property (1422 E 68th) (.1); review settlement statement for

Date	Indiv	Hours	Description
			<p>closing of receivership property (7508 S Essex) and prepare e-mail to title agent requesting modifications thereto (.1); remote assistance with closings of receivership properties (7201 S Dorchester and 1700 W Juneway), including rent roll review and analysis, water proration analysis, and reconciliation of final settlement statements (1.5); review all housing court and administrative orders circulated by J. Wine, updated closing checklists, and distribute same to counsel for purchasers (.5); research closing documents, e-mail correspondence, and Cook County tax records and reconcile escrow refund check associated with closing of conveyance of receivership property (701 S Fifth) (1.3).</p> <p>Asset Disposition</p>
10/20/2020	JR	6.60	<p>Exchange correspondence with property management requesting property reports for closings (1700 Juneway and 7201 S. Dorchester) (.1); exchange correspondence with A. Porter regarding closings (1700 Juneway and 7201 S. Dorchester) (.5); attend closings of properties (1700 Juneway and 7201 S. Dorchester) (5.8); exchange correspondence with K. Duff, K. Pritchard and J. Wine confirming closed properties and anticipated net proceeds (1700 Juneway and 7201 S. Dorchester) (.1); exchange correspondence with property management regarding same (1700 Juneway and 7201 S. Dorchester) (.1).</p> <p>Asset Disposition</p>
10/21/2020	KMP	0.50	<p>Review online bank records to confirm deposits of proceeds from sales of properties (7201 S Dorchester, 1700 Juneway) and communicate with K. Duff and J. Rak regarding same (.2); prepare deposit documentation and transmittal to bank regarding return of unused escrow funds for sold properties (701 S 5th, 8432 S Ellis) (.3).</p> <p>Asset Disposition</p>
	JR	5.80	<p>Exchange correspondence with the closer at title company regarding authorization disbursement of funds related to closings (1700 Juneway and 7201 S. Dorchester) (.1); review final waiver of lien for property management and notices to tenants (.2); request execution of same from property management (7508 S. Essex) (.1); update transfer tax declaration form with the correct dates relating to same (7508 S. Essex) (.1); review ledgers, delinquency report and update certified rent roll regarding upcoming closing (7508 S. Essex) (.7); review leases regarding same (7508 S. Essex) (.2); draft closing documents for property (816-22 E. Marquette) (4.0); exchange correspondence with buyer requesting updated due diligence documents for properties (7024 S. Paxton and 4750 S. Indiana) (.1); request same from property management (.1); exchange correspondence with broker requesting commission statements on 14 properties subject to tenth motion (.1); review email from property management and provide requested information related to property (7201 S. Dorchester) (.1).</p> <p>Asset Disposition</p>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/22/2020	KMP	0.20	Review online banking records relating to property (701 S 5th) to confirm receipt of all unused escrow funds subsequent to closing and communicate with K. Duff and A. Porter regarding same.  Asset Disposition
	AEP	8.80	Read through title commitment for single-family homes, record every special exception requiring deletion prior to closing, research chain of title for all properties showing title vested in non-receivership entities (7933 S Kingston, 8104 S Kingston, 8524 S Rhodes, 310 E 50th, and 6807 S Indiana), and prepare comprehensive memorandum to title underwriter requesting approval of proposed courses of action for clearing remaining exceptions (6.5); record remaining unresolved title exceptions associated with properties in tenth sales tranche (4317 S Michigan, 4533 S Calumet, 4750 S Indiana, 6217 S Dorchester, 7024 S Paxton, and 7701 S Essex), begin researching same and preparing action plan for discussion with title underwriter (2.3).  Asset Disposition
	AW	0.90	Study draft response to motion to reconsider and communicate with M. Rachlis regarding revisions.  Asset Disposition
	JR	7.30	Update single family homes documents (.5); exchange correspondence with A. Porter regarding single family homes (.1); review email from buyer's counsel regarding request for information related to closing (7508 S. Essex) (1.); exchange correspondence with A. Porter regarding same (7508 S. Essex) (.2); review email from property management and provide requested buyer information for properties that sold (1700 Juneway and 7201 S. Dorchester) (.1); update certified rent roll for property (7508 S. Essex) and provide requested prorations to buyer's counsel (.3); review email from A. Porter regarding requested information from buyer's counsel related to property (2800 E. 81st) and respond accordingly (.2); review due diligence documents requested and further correspond with property management requesting same (2800 E. 81st) (.3); draft closing documents for property in anticipation of closing (431 E. 42) (1.8); review leases related to property (816-22 S. Marquette), review lease terms and security deposits and update certified rent roll in anticipation of closing (816-22 S. Marquette) (.9); review documents requested for closing (7508 S. Essex) from property management and update electronic files (.2); forward same to buyer's counsel regarding property (7508 S. Essex) (.1); update notice to tenants in anticipation of closing (816-22 E. Marquette) (.2); draft closing documents for property (4533-47 S. Calumet) (1.5); draft rent roll regarding same (5433-47 S. Calumet) (.6); review lender objections to the 10th motion and exchange correspondence with A. Porter regarding submitting water applications for processing of various properties not subject to lender objections (.2).  Asset Disposition

Date	Indiv	Hours	Description
10/23/2020	KMP	0.40	Review online banking records to identify account numbers for distribution of proceeds for next tranche of properties to be offered for sale, and communicate with bank representative regarding establishing additional accounts in connection with same.  Asset Disposition
	AEP	3.20	Read and respond to e-mail from counsel for purchaser of receivership properties (4750 S Indiana and 7024 S Paxton) regarding existence of special exceptions on corresponding title commitments and receivership plans for deleting said exceptions at closing (.2); read objection to tenth motion to confirm sales and proofread, reconcile, and revise proposed order partially granting tenth motion as to property sales eliciting no objection (1.8); preliminary communications with alternative title company regarding potential issuance of insurance over special exceptions raised by current insurer (.3); teleconference with K. Duff, receivership broker, and counsel for special servicer regarding status of preparation of marketing of single-family home portfolio, including title issues, sales contract issues, due diligence issues, and marketing issues (.5); prepare email to counsel for all purchasers of receivership property subsumed within tenth motion to confirm regarding status of ruling on motion and anticipated timing of closings (.4).  Asset Disposition
	JRW	0.90	Prepare order partially granting tenth sales motion (.4); related communications with A. Porter and revisions to same (.3); draft cover letter to court regarding proposed order (.2).  Asset Disposition
	JR	5.10	Exchange correspondence with broker regarding properties subject to lender objections (.1); draft closing documents for property (4533-47 S. Calumet) (1.6); review email from buyer's counsel and provide requested documents for property (7508 S. Essex) (.2); exchange correspondence with property management requesting current property reports requested by buyer's counsel (7508 S. Essex) (.1); review email from buyer's counsel requesting commercial leases for property (6250 Mozart), review leases and provide same to buyer's counsel (.2); review commission statements received from broker related to the 10th motion, update electronic files, closing checklists and closing figures for properties (431 E. 42nd, 4533 S. Calumet and 816 E. Marquette) (.6); request buyer information from buyer's counsel on various properties in preparation for submission of water applications (816 S. Marquette, 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex and 431 E. 42nd) (.6); request title commitment updates regarding same (816 S. Marquette, 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex and 431 E. 42nd) (.5); prepare water applications for properties in preparation for closings (816 S. Marquette, 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex and 431 E. 42nd) (1.2).  Asset Disposition
10/25/2020	AEP	1.70	Review and update closing checklist for receivership property (431 E 42nd), confirm deadline for tax redemption, prepare e-mail to title company scheduling closing, prepare e-mail to buyer's counsel regarding scheduling of

Date	Indiv	Hours	Description
			<p>closing, and prepare e-mail to J. Wine regarding order partially granting tenth motion to confirm sales (.4); review and update closing checklist for receivership property (4533 S Calumet), check status of payment of second installment 2019 property taxes and read e-mails from buyer's counsel regarding nominee and lender information, and prepare e-mail to title company requesting revisions to title commitment (.4); review and update closing checklist for receivership property (816 E Marquette), check status of payment of second installment 2019 property taxes, and prepare e-mail to buyer's counsel requesting nominee, lender, and post-closing management information (.2); review and update closing checklist for receivership property (7442 S Calumet), check status of payment of second installment 2019 property taxes, and prepare e-mail to buyer's counsel requesting nominee, lender, and post-closing management information and describing restriction subject to which property will be conveyed (.3); review and update closing checklist for receivership property (1422 E 68th), check status of payment of second installment 2019 property taxes, and prepare e-mail to buyer's counsel requesting nominee, lender, and post-closing management information (.2); review and update closing checklist for receivership property (7701 S Essex), check status of payment of second installment 2019 property taxes, and prepare e-mail to buyer's counsel requesting nominee, lender, and post-closing management information (.2).</p> <p>Asset Disposition</p>
10/26/2020	KMP	0.30	<p>Revise chart regarding next tranche of properties to be offered for sale to identify account numbers for proceeds of same, and communicate with J. Rak regarding same.</p> <p>Asset Disposition</p>
	AEP	2.60	<p>Read e-mails from prospective purchasers of receivership properties (816 E Marquette, 7701 S Essex and 7742 S Calumet), update closing checklists accordingly, and request revised title commitments (.5); teleconference with receivership broker regarding status of negotiations over closing credit to purchaser of receivership property (7327 S Bennett) and issues associated with closing of all remaining properties in pipeline (.3); research files and public records and prepare hold harmless indemnity request letter to prior title insurer in connection with remaining clouds on title to receivership property (4533 S Calumet) (1.4); prepare correspondence to outside counsel for City of Chicago requesting information regarding status of payment of judgment recorded against prior owner of receivership property (7701 S Essex) (.2); prepare correspondence to corporation counsel regarding status of enforcement of injunction order entered against prior owner of receivership property (7701 S Essex) (.2).</p> <p>Asset Disposition</p>
	JRW	0.40	<p>Revise proposed order on tenth sales motion (.3) and cover email to court clerk regarding proposed order (.1).</p> <p>Asset Disposition</p>

Date	Indiv	Hours	Description
	JR	1.60	<p>Review email from buyer's counsel regarding requested buyer information for property (4533 S. Calumet) (.1); update water application and closing checklist regarding same (4533 S. Calumet) (.2); exchange correspondence with the title company regarding same (4533 S. Calumet) (.1); review email from property management regarding buyer information and provide same for closed property (7051 S. Bennett) (.1); review email from title company regarding water applications and provide requested information regarding same (816 S. Marquette; 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex and 431 E. 42nd) (.3); review email from K. Pritchard regarding requested bank account information for future closings and update closing documents regarding same (816 S. Marquette; 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex and 431 E. 42nd, 1422 E. 68th, 2800 E. 81st, 4611 S. Drexel, 4750 S. Indiana, 6217 S. Dorchester, 7024 S. Paxton, 7255 S. Euclid, 7840 S. Yates) (.8).</p> <p>Asset Disposition</p>
10/27/2020	AEP	2.00	<p>Prepare updated closing costs for receivership property (638 N Avers) (.1); review proposed order partially granting tenth motion to confirm and provide comments to K. Duff (.1); read e-mail from counsel for purchaser of receivership property (431 E 42nd) and finalize closing figures (.2); teleconference with J. Rak regarding status of preparation for closings of receivership properties (7701 S Essex, 7742 S Calumet, and 816 E Marquette) (.3); read order granting remainder of eighth and ninth motions to confirm sales and peruse notice of appeal and motion to stay filed by certain lenders (.3); prepare e-mail to counsel for purchasers of receivership properties (6949 S Merrill, 7600 S Kingston, 7656 S Kingston, 1131 E 79th, and 6250 S Mozart) regarding outcome of judicial rulings and effect of motion to stay pending appeal (.3); teleconference with potential new title company regarding impasses with current title company over deletion of special exceptions on various receivership properties (7237 S Bennett and single-family home portfolio) (.7).</p> <p>Asset Disposition</p>
	JR	5.10	<p>Review email from title company regarding water applications and update closing checklist relating to properties (816 S. Marquette; 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex, 431 E. 42nd) (.2); review email from property management regarding closing (7508 S. Essex) and update files with subsidy agreement (.1); forward same to buyer's counsel (.1); review emails related to title commitments and exchange correspondence with lender requesting lender requirements for further updates related to properties (7442 S. Calumet, 7701 S. Essex) (.5); update closing checklists regarding same (7442 S. Calumet, 7701 S. Essex) (.2); exchange correspondence with property management requesting updated property reports for closing (7508 S. Essex) (.1); review requested reports and update certified rent roll for same (7508 S. Essex), update electronic files (.4); review email from broker and respond regarding property keys coordination for closing (7508 S. Essex) (.1); draft documents in preparation for closing of property (7508 S. Essex)(1.0); telephone call with A. Porter</p>

Date	Indiv	Hours	Description
			regarding status of upcoming closings and plan of action (.4); exchange correspondence with K. Duff and A. Porter regarding execution of closing documents (.2); review emails regarding scheduling of various closings and update closing checklist (.5); exchange correspondence with property management requesting updated rent roll reports for upcoming closings (7600 Kingston, 7656 S. Kingston) (.1); exchange correspondence with broker requesting commission statement for upcoming closings (6949 S. Merrill, 7600 Kingston, 7656 S. Kingston) (.2); prepare water applications for properties (6949 S. Merrill, 7600 Kingston, 7656 S. Kingston) (.8); submit same to the title company for processing (6949 S. Merrill, 7600 Kingston and 7656 S. Kingston) (.2).
			Asset Disposition
10/28/2020	KMP	0.20	Review online bank records to confirm receipt of proceeds for sold property (7508 S Essex) and communicate with J. Rak regarding same.
			Asset Disposition
	AEP	1.60	Review corresponding title commitments and prepare proposed order granting eighth motion to confirm sales (.6); remote assistance with closing of receivership property, including negotiations over encroachment endorsements, review and analysis of certified rent roll and computation of prorations and credits, and review of final settlement statement (1.0).
			Asset Disposition
	JRW	0.80	Work with A. Porter on preparation of proposed orders granting eighth and ninth sales motions (.2); telephone conference with claimant's counsel regarding property closings and communicate with team regarding response to same (.3); draft email to court clerk regarding entry of proposed orders and related email exchange (.3).
			Asset Disposition
	JR	5.80	Exchange correspondence with property management requesting updates for closing (7508 S. Essex) (.3); update certified rent roll regarding same (7508 S. Essex) (.5); attend closing for property (7508 S. Essex) (4.2); notify all parties on confirmation of closing and net proceeds of sale (7508 S. Essex) (.2); review email from property management related to request for property information and respond accordingly (2800 E. 81st) (.2); prepare power of attorney for various properties (.4).
			Asset Disposition
10/29/2020	AEP	1.00	Review and analyze settlement statement for closing of sale of receivership property (431 E 42nd) (.1); communications with former title company regarding need for hold harmless letter associated with prospective conveyance of receivership property (.1); review and analyze revised title commitments in connection with prospective sales of receivership properties (4533 S Calumet and 816 E Marquette) and communicate with purchasers' counsel to confirm accuracy of lender information (.2); prepare proposed order granting ninth motion to confirm sales in remaining part in connection with prospective sales of receivership property (1131 E 79th and 6250 S Mozart) (.6)
			Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/29/2020	AW	0.30	Revisions to draft order granting eighth motion to confirm sales and email J. Wine regarding requested revisions.  Asset Disposition
	JR	5.30	Exchange correspondence with the title company requesting estimate of redemption for closing (431 E. 42nd) (.2); telephone call to the Cook County Clerk's office regarding same (431 E. 42nd) (.3); prepare draft closing documents for property (6949 S. Merrill) (3.1); follow up correspondence with property management requesting updated rent rolls in preparation for closings (7600 and 7656 S. Kingston) (.1); review and update electronic files regarding same (7600 and 7656 S. Kingston) (.2); exchange correspondence with property management providing closing confirmations and request current rent rolls in preparation for closings (816 S. Marquette, 7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill) (.2); update closing figures in anticipation for closing (6949 S. Merrill) (.3); draft closing documents for property (7600 S. Kingston) (.9).  Asset Disposition
10/30/2020	AEP	4.80	Review title commitments associated with receivership properties (7600 S Kingston and 7656 S Kingston), research current property tax liability and status of release of judgments listed as special exceptions, and prepare e-mail to title insurer requesting appropriate revisions (.4); review latest revisions to title commitment on receivership property (4611 S Drexel) and make appropriate modifications thereto (.1); teleconference (6949 S Merrill, 7600 S Kingston, and 7656 S Kingston) regarding potential settlement of dispute over earnest money following judicial decision confirming eighth motion to confirm sales and implications of regulatory agreement recorded against receivership property (7024 S Paxton) (.6); research files for information pertaining to judgment order recorded against receivership property (4611 S Drexel) and respond to e-mail inquiries from J. Wine regarding options for securing removal of encumbrance (.3); additional correspondence with J. Wine regarding copy of judicial order on receivership property (4611 S Drexel) (.1); additional correspondence with J. Wine regarding potential negotiation of resolution of administrative proceedings pending against receivership property (.1); teleconference with K. Duff and receivership broker regarding eighth motion to confirm and status of sales of all other as-yet un conveyed properties (1.3); prepare detailed e-mail to prospective new title insurer regarding (property manager refusal to deliver lien waiver at closing of sale of) receivership property (7237 S Bennett) (.6); review and analyze chain of title of receivership property (4317 S Michigan) and prepare e-mail to prospective new title insurer demonstrating basis for issuing commitment without raising exceptions appearing on current draft of commitment (1.3).  Asset Disposition



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
10/30/2020	AW	0.40	Communicate with K. Duff regarding objections to ninth and tenth sale motions.  Asset Disposition		
	JR	6.20	Review emails from property management and update electronic files with requested due diligence documents in anticipation of closings (816 S. Marquette, 7024 S. Paxton, 7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill) (.4); draft closing documents for property (7600 S. Kingston) (1.9); review email from buyer's counsel related to lender information for upcoming closings (7600 and 7656 S. Kingston) and update electronic files regarding same (.2); draft closing documents for property (7656 S. Kingston) (1.9); review email from title company regarding requested county information for upcoming closings and respond accordingly (.2); review orders entered granting 8th and 10th motion to approve sale and update electronic files relating to same (.3); update closing documents regarding anticipated closing (431 E. 42nd) (.3); telephone call with A. Watychowicz regarding upcoming closings and scheduling of execution of documents on various properties (.3); review email from buyer counsel regarding buyer information and update closing checklist (431 E. 42nd) (.3); review email from buyer's counsel and update closing checklist regarding same (6949 S. Merrill) (.2); exchange correspondence with A. Porter regarding upcoming rescheduling of closings of properties (6949 S. Merrill, 7600 Kingston and 7656 S. Kingston) (.2).  Asset Disposition		
SUBTOTAL:				181.20	40362.00]
<u>Business Operations</u>					
10/1/2020	KMP	0.40	Communicate with property manager and EB team regarding electronic payment notices from utility company (.2); confer with A. Watychowicz regarding status of upcoming filings (.2).  Business Operations		
	JRW	1.40	Exchange correspondence with K. Duff and A. Porter regarding pending administrative proceedings (7109 S Calumet) and related research regarding same (.4); exchange correspondence with property manager (M. Abraham) regarding scheduling of inspections (7201 S Constance, 7600 S Kingston, 7237 S Bennett, 638 N. Avers) (.2); exchange correspondence with City of Chicago regarding upcoming housing court matters (6217 S Dorchester, 7237 S Bennett, 638 N. Avers, 7600 S Kingston) and forwarding evidence of property sales (7300 S St. Lawrence, 7201 S Constance, 7110 S Cornell) (.8).  Business Operations		
10/2/2020	ED	2.40	Further review and analysis of drafts of May accounting reports (9); prepare analysis of reimbursable amounts due from proceeds of sold properties (.4); review of J. Rak comments identifying discrepancies in certain draft reports and consult underlying financial records and correspondence (.8) and email correspondence to J. Rak regarding same (.1); draft email correspondence to accountant requesting review of remaining discrepancies (.2).  Business Operations		

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/5/2020	JRW	1.60	Exchange emails with city attorney regarding entry of order (7546 Saginaw) (.2); related email to property manager regarding payment of same (7546 Saginaw) (.1); investigate administrative proceeding against property (6437 S Kenwood) (.3); study notices of violation, evidence in file from property manager's redress of violations in and counts in two cases against property (7109 S Calumet) (.5); review new orders in administrative matters (7656-58 S Kingston, 7109 S Calumet, 7600-10 S Kingston, 416-24 E 66th St) and work with K. Pritchard to update hearing docket (.5).  Business Operations
10/6/2020	ED	0.40	Prepare summary of accounting reports prepared and delivered in third quarter (.1); draft and send email correspondence to accountant regarding discrepancies in May reports requiring revision (.3).  Business Operations
	JRW	0.80	Research regarding status of administrative and housing court proceedings (4611 S Drexel, 6217 S Dorchester, 7255 S Euclid, 6250 S Mozart, 7109 S Calumet, 1131-41 E 79th Pl., 638 N. Avers) and related exchange of correspondence with claimant's counsel (.3); review orders in administrative proceedings (4520 S Drexel, 6250 S Mozart, 6951 S Merrill) and update docket regarding same (.4); exchange correspondence with K. Duff and A. Porter regarding matter relating to property (7114 S Cornell) (.1).  Business Operations
10/7/2020	KMP	0.30	Prepare form for wire transfer to financing company for payment of insurance premium financing installment and communications with K. Duff and bank representatives regarding same.  Business Operations
	ED	1.80	Review revised May reports (.4) and email correspondence to accountant with additional comments and corrections (.2) and requesting analysis of remaining rent restoration and reimbursable amounts by properties. (.2); final review of May reports (1.0).  Business Operations
	JRW	2.10	Correspond with property manager regarding potential resolution of violation (6250 S Mozart) and related exchange with A. Porter and K. Duff (.3); telephone conference with city counsel regarding housing court matters (7237 S Bennett, 638 N. Avers, 7600 S Kingston, 6217 S Dorchester, 7300 S St Lawrence, 7201 S Constance and 7110 S Cornell) and related follow up correspondence regarding continuation and dismissal orders (.9); prepare correspondence to ownership dispute division regarding pending administrative matter (7750 S Muskegon) (.2); research regarding corporate issue (.5); review administrative court notices (6951 S Merrill, 6250 S

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Mozart) and related exchange with A. Watychowicz (.1); exchange correspondence with property manager regarding scheduling of inspection (6217 S Dorchester) (.1).
			Business Operations
10/8/2020	ED	4.00	Review and revise analysis of remaining rent restoration and reimbursement amounts due as of May 31, 2020 (1.5); draft correspondence to lender's counsel to transmit accounting reports, including explanations of insurance expense for all unsold properties and inspection expenses for certain properties (.9); email correspondence with accountant and J. Rak regarding apparent discrepancy in one draft report (8432 S Essex) and review of corrected statement (.2); review of premium finance agreements executed in connection with renewals of property and liability insurance (.3); prepare analysis of restoration amounts due from sold properties (.6); review and organize financial reporting data necessary for preparation of June accounting reports (.5).
			Business Operations
	JRW	2.10	Exchange correspondence with A. Porter and counsel for buyers regarding housing court matters (7201 S Constance, 7110 S Cornell and 7300 S St Lawrence) (.4); review correspondence regarding attorney's lien notice (7114 S Cornell) and related communications with K. Duff and A. Porter and voice message to claims counsel (.5); confer with A. Watychowicz regarding continuation orders in administrative matters (6949 S Merrill, 4520 S Drexel, 6250 S Mozart) (.2); review draft pleadings and communicate with K. Duff and E. Duff regarding property manager's communication regarding accounts payable and restoration motion (.2); exchange correspondence with city counsel regarding default judgments (431 E 42nd Pl) and related review of online database and email exchange with A. Porter (.3); communicate with A. Porter and K. Duff regarding settlement (431 E 42nd Pl) (.2); exchange correspondence with K. Duff and A. Watychowicz regarding claimant communication (1102 Bingham) and related voice message to counsel (.3).
			Business Operations
10/9/2020	KMP	1.10	Communicate with insurance broker regarding sold properties (.2); communicate with K. Duff regarding additional security installation (638 N. Avers) (.1); study property manager's reporting for September and review backup documentation on owner portal relating to same (.8).
			Business Operations
	ED	1.10	Transmit May accounting reports to lenders' counsel (.6); email correspondence with accountant regarding analyses of restoration and reimbursement amounts (.2) organize financial data for use in preparing accounting reports (.3).
			Business Operations

Date	Indiv	Hours	Description
10/9/2020	JRW	1.20	Telephone conference with law firm and related correspondence regarding tax matter (1102 Bingham) (.2); exchange correspondence and records with A. Porter regarding lis pendens and injunction in order dismissing housing court matter (7508 S Essex) (.4) and related correspondence to corporate counsel (.2); exchange correspondence with city's ownership dispute division regarding dismissal order (7750 S Muskegon) (.2); settlement proposal from collection counsel and related exchange of correspondence with A. Porter regarding motion to set aside default judgments (.2).
			Business Operations
	AW	1.10	Prepare financial statements on property by property basis for service and email E. Duff regarding reports.
			Business Operations
10/12/2020	KMP	0.40	Prepare form for funds transfer to property manager for additional security installation (at 638 N. Avers) and communicate with K. Duff and bank representatives regarding same.
			Business Operations
	JRW	1.00	Begin drafting motions to vacate default judgments (431 E 42nd Pl.) (.3); review files regarding upcoming administrative hearings (6437 S Kenwood, 5001 S Drexel, 6356 S California, 5618 S MLK) (.4); correspondence to A. Porter and K. Duff regarding upcoming administrative hearing (6437 S. Kenwood) (.1); review correspondence regarding administrative matters (7024 S Paxton) and related exchange with A. Porter regarding release of lien (.2).
			Business Operations
10/13/2020	KMP	0.70	Follow up communications with K. Duff and bank representatives regarding funds transfer to property manager for additional security installation at property (638 N Avers) (.2); confer with K. Duff regarding renewal of security installation at another property (7237 S Bennett) and prepare request form to wire funds for same to property manager (.2); research regarding property entity name (638 N Avers) for insurance settlement payments and communicate with K. Duff and A. Watychowicz regarding same (.3)
			Business Operations
	ED	0.70	Prepare analysis of reimbursement amounts due from sold properties (.4); telephone conference with K. Duff to discuss property financial reporting (.3).
			Business Operations
	JRW	1.00	Confer with collections firm regarding property tax lawsuit (1102 Bingham), related review of records and update to K. Duff and A. Porter (.7); communicate with K. Duff and E. Duff regarding accounts payable to property manager (.1); confer with A. Porter regarding dismissal from administrative matter (6437 S Kenwood) (.1); exchange correspondence with A. Porter regarding housing court matter (7508 S Essex) (.1).
			Business Operations

Date	Indiv	Hours	Description
10/13/2020	AW	0.40	Locate detailed info regarding entity and email K. Pritchard regarding same (.1); research regarding Houston litigation and email J. Wine regarding findings (.3).  Business Operations
10/14/2020	KMP	0.30	Follow up communications with K. Duff and bank representatives regarding funds transfer to property manager for additional security installation at property (7237 S Bennett).  Business Operations
	JRW	2.90	Correspond with City counsel regarding extension of compliance deadline in housing court matter (7508 S. Essex) and entry of orders in various matters (.3); correspondence to City of Chicago Ownership Dispute unit regarding pending administrative matter (6437 S Kenwood) (.2); prepare for conference with counsel regarding tax matter (1102 Bingham) and related review of file tax statement and payment plan (1.1); telephone conference with counsel in Texas tax matter (1102 Bingham) (.2) and related review of complaint and summary to K. Duff and A. Porter (.2); exchange correspondence with counsel for Harris County (1102 Bingham) regarding violation of order appointing receiver, potential motion for rule to show cause, and nonsuit of action and related update to team (.5); correspond with A. Porter and property manager regarding payment of judgment lien (7024 S Paxton) and related review of prior notice and correspondence regarding second lien on property (.2); email to property manager regarding payment of judgment order (7546 S Saginaw) and related exchange with J. Rak (.1); correspondence to collections counsel regarding release of second lien on property (7024 S Paxton) (.1).  Business Operations
	AW	0.40	Work with K. Duff on notice of receivership for accountant and serve notice via mail and email.  Business Operations
10/15/2020	JRW	0.90	Review order of nonsuit for tax action (1102 Bingham) (.1); exchange correspondence with collections counsel regarding lien release (7024 S Paxton) and related review of release and update to A. Porter and J. Rak (.2); exchange correspondence with A. Porter regarding unpaid judgment (6356 S California) (.2); correspond with City of Chicago Ownership Dispute division and A. Porter regarding evidence of payment (6437 S Kenwood) (.1); confer with J. Rak regarding property manager's lien waiver for property (7051 S Bennett) (.1); review prior correspondence and related analysis to K. Duff regarding property manager accounts payable (7051 S Bennett) (.2).  Business Operations

Date	Indiv	Hours	Description
10/16/2020	JRW	0.40	Confer with property manager regarding accounts payable (.2) and related telephone conference with K. Duff restoration motions (.2).  Business Operations
10/19/2020	KMP	0.40	Review and analyze property manager's request for funds for utility and other expenses at certain properties (638 N Avers, 1401 W 109th, 7201 S Dorchester) and communicate with K. Duff and E. Duff regarding same.  Business Operations
	AW	0.20	Communicate with J. Wine regarding previously filed motions to strike, review files, and communicate with counsel regarding results.  Business Operations
10/20/2020	KMP	1.10	Prepare forms for funds transfer in connection with property manager's request regarding utility and other expenses at certain properties (638 N Avers, 1401 W 109th, 7201 S Dorchester) and communicate with K. Duff and bank representatives regarding same (.4); communicate with property manager to confirm funds transfer (.2); communicate with E. Duff regarding spreadsheet and confirmation of funds transfers relating to restoration (.2); communicate with insurance broker to advise of recently closed properties and request information relating to premium financing (.2) and confer with K. Duff regarding same (.1).  Business Operations
	ED	1.80	Telephone conference with accountant regarding updated process for preparation of accounting reports (.3); prepare draft of email correspondence to lenders' counsel regarding completion of rent restoration and future reporting from receivership, including attachments describing funds transfers and confer with K. Duff regarding same (.8); review and analysis of schedules of rent restoration payments made pursuant Order approving Second Motion for Restoration of Funds Expended for the Benefit of Other Properties (.7).  Business Operations
	JRW	1.80	Communicate with City counsel regarding extension of compliance date (7508 S Essex) and entry of orders (.2); review housing court orders (7237 S Bennett, 7110 S Cornell, 7300 St Lawrence, 638 N Avers, 7201 S Constance, 7600 S Kingston, 6217 S Dorchester) and update records and docket (.7); correspondence to claimant's counsel regarding status of administrative proceedings (6217 S Dorchester, 6250 S Mozart, 7109 S Calumet, 638 N. Avers) (.4), review new administrative court orders (4520 S Drexel, 7110 S Cornell, 7750 S Muskegon) and release of lien (7024 S Paxton) and related communication with K. Duff and A. Porter (.5).  Business Operations
	AW	0.20	Attention to notice regarding other lawsuit and communicate with K. Duff regarding filed claim and counsel involvement.  Business Operations

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/21/2020	ED	0.60	Preparation for call with accountant regarding monthly review of financial reporting from property manager (.2), and related email correspondence (.3); confer with A. Watychowicz to request document relating to properties to be discussed (.1).  Business Operations
	AW	0.30	Call with J. Wine regarding access to online platforms (.2); communicate with K. Duff regarding transcripts of various proceedings (.1).  Business Operations
10/23/2020	KMP	0.30	Review invoices and statement of loss from loss manager regarding property damage settlement (638 N Avers) and communicate with K. Duff regarding same.  Business Operations
	JRW	0.30	Exchange correspondence with A. Porter regarding code violation (4533 S Calumet) (.2); exchange correspondence with property manager regarding water meter notice (7840 S Yates) (.1).  Business Operations
10/26/2020	KMP	0.80	Prepare form to request transfer of funds for loss management services relating to EB property (638 N Avers), and communicate with bank representatives and K. Duff regarding same (.4); communicate with loss management representative to request a comprehensive statement of loss relating to the property (638 N Avers) (.2); communicate with insurance broker regarding issues relating to reduction in premium funding payments as a result of property sales (.2).  Business Operations
	ED	0.70	Email correspondence with accountant and J. Rak regarding development of process for updating financial reporting to lenders and for use in management of portfolio by Receiver.  Business Operations
	JRW	1.20	Email exchange with corporation counsel regarding motions to set aside default judgments (431 E 42nd Pl.) (.2); prepare and file motions to set aside with supporting documentation (431 E 42nd Pl.) (.8); update team regarding general order from City of Chicago Department of Administrative hearings regarding hearings in Department of Buildings matters (.2).  Business Operations

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/27/2020	KMP	0.50	Further communication with loss management representative regarding comprehensive statement of loss and pending insurance payments relating to EB property (638 N Avers) (.2); communicate with K. Duff regarding issues relating to payment of expenses relating to same (638 N Avers) (.1); communicate with K. Duff regarding remaining transfers relating to second restoration motion in light of Court's order granting same (.2).  Business Operations
	ED	1.70	Conference call with accountants and J. Rak to discuss preparation of property financial reporting for dissemination to lenders' counsel and tracking of restoration amounts to be reimbursed from proceeds of property sales (1.3); preparation for same (.2); email correspondence with property manager regarding basis of reporting in monthly property financial reporting (.2).  Business Operations
	JRW	0.40	Review lien notice (4611 S. Drexel) and related research and exchange of correspondence.  Business Operations
10/28/2020	KMP	0.40	Further communication with K. Duff regarding remaining transfers relating to second restoration motion in light of Court's order granting same (.1); review property manager's financial records to determine current property (6250 S Mozart) net income and communicate with K. Duff regarding same (.3).  Business Operations
	ED	0.20	Email correspondence with K. Duff regarding calculation of restoration owed from property (638 N Avers) for purposes of preparing statement of estimated closing costs.  Business Operations
	JRW	1.60	Exchange correspondence with corporation counsel regarding Department of Sanitation matters (431 E. 42nd PI) (.3); attention to drafting proposed order granting remainder of restoration motion and related communications regarding exhibit to same (.6); correspond with A. Porter regarding lien notice and judgment order (4611 S Drexel) (.1); review new administrative hearing orders (8209 S Ellis) and confer with A. Watychowicz regarding same (.2); exchange correspondence with property manager and K. Duff regarding repairs to property (7840 S Yates)(.4).  Business Operations
10/29/2020	KMP	0.20	Communication with K. Duff and E. Duff regarding adjustments to insurance premium financing installments in light of various property sales.  Business Operations
10/30/2020	KMP	0.80	Communication with insurance broker regarding updated payment schedules for insurance premium financing installments in light of various property sales (.2); prepare form for funds transfer to premium



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
			financing company for installment payment on property insurance, and communicate with K. Duff and bank representatives regarding same (.4); communicate with K. Duff regarding preservation of records (.2).		
			Business Operations		
10/30/2020	ED	0.20	Email correspondence to accountants to supply background for preparation of accounting reports, and review of related financial information.		
			Business Operations		
	JRW	1.60	Research administrative order (4611 S Drexel) and related exchange of correspondence with property manager and A. Porter (.2); exchange correspondence with A. Porter regarding escrow for administrative judgment (431 E 42nd Pl) (.1); exchange correspondence regarding notice of lien (4611 S Drexel) (.1); telephone conference with collections counsel regarding recording of lien and judgment order (4611 S Drexel), draft correspondence regarding same, and related communications with K. Pritchard and K. Duff regarding prior notice (1.2).		
			Business Operations		
SUBTOTAL:				[48.20	13324.00]

Case Administration

10/5/2020	AW	0.90	Prepare pleadings and request update to Receivership website.		
			Case Administration		
10/6/2020	KMP	0.20	Work with IT consultant to add recent pleadings to Receiver's web page.		
			Case Administration		
10/8/2020	AW	0.20	Attention to order entered by administrative court (6949 S Merrill) and update docket (.1); attention to entered order regarding tenth sale motion and update docket (.1).		
			Case Administration		
10/13/2020	AW	0.20	Attention to mortgagees' motion to reconsider and update docket (.1); attention to Judge Lee's order regarding same, communicate deadline to counsel, and update docket (.1).		
			Case Administration		
10/19/2020	AW	1.00	Communicate with J. Wine regarding revisions to receivership web page (.1); prepare pleadings and request update to receivership web page (.7); attention to previously posted pleadings and communicate with IT consultant regarding proposed revisions (.2).		
			Case Administration		

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
10/20/2020	AW	0.20	Attention to orders from municipal division and communication regarding deadlines for inspections and docket same.  Case Administration		
10/21/2020	KMP	0.50	Review employee and payroll documents to confirm status of former EB employee and communicate with K. Duff and A. Watychowicz regarding same (.3); renew USPS forwarding of EB mail (.2).  Case Administration		
10/23/2020	AW	0.20	Work on order granting tenth motion to approve sale and communicate with J. Wine regarding same.  Case Administration		
10/27/2020	AW	1.00	Attention to entered orders regarding third party request for relief and approving eighth and ninth sale motions and notify counsel of same (.1); request upload of pleadings to receivership web page (.7); attention to pleadings relating to newly filed appeal and forward same to counsel (.2).  Case Administration		
10/29/2020	AW	0.20	Attention to annual reports for entities (6217 S Dorchester and 4611-17 S Drexel) and update docket (.1); request update to receivership web page (.1).  Case Administration		
SUBTOTAL:				[ 4.60	644.00]

Claims Administration & Objections

10/1/2020	JRW	8.10	Study and revise multiple drafts of response to motion for priority determination and turnover of funds (1.3); telephone conference with claimants' counsel regarding joint motion regarding pending matters for disposition (.2); revise and finalize same and related email exchanges with claimants' counsel, EB team and SEC (.9); prepare list of scheduling issues for claims process (.5); telephone conference with M. Rachlis and K. Duff regarding joint report on pending motions, turnover motion, standard discovery and related position statement (1.0); review of briefing on claims motion (.4); continue working on motion setting forth participants' discovery positions (1.6); study latest draft of standard discovery requests to investors from institutional lenders' counsel and related analysis and communications with M. Rachlis and K. Duff (1.7); prepare exhibits to discovery motion (.5).  Claims Administration & Objections		
-----------	-----	------	--	--	--

Date	Indiv	Hours	Description
10/1/2020	AW	0.70	Respond to claimant's email and voice message regarding discovery (.1); attention to first draft of response to motion for turnover and begin proofreading same (.4); attention to email exchanges with lenders' counsel regarding discovery motion and joint status on pending motions (.2).
			Claims Administration & Objections
	MR	7.40	Review and revise several drafts of claims process standard discovery and follow up communications regarding same (3.7); conference with K. Duff and J. Wine regarding claims process, standard discovery, joint submission and related issues (1.0); work on response to turnover motion and follow up regarding same with K. Duff and J. Wine (6751 Merrill and 7110 Cornell) (2.7).
			Claims Administration & Objections
10/2/2020	JRW	6.70	Finalize joint statement regarding pending motions for filing and related exchange with counsel (.2); analyze new discovery requests proposed by claimants and update joint motion regarding same (1.8); review drafts and comment on response to motion and related conference with K. Duff (.4); work with M. Rachlis on joint report to Court regarding discovery and framework for same (1.0); work with M. Rachlis to revise standard discovery requests to investors (1.6); various emails and telephone conference with claimants' counsel regarding discovery requests, joint motion and exhibits (.4); conferences with A. Watychowicz regarding service issues and filings (.4); incorporate arguments from claimants into joint report and finalize same for filing (.9).
			Claims Administration & Objections
	AW	4.60	Attention to email from claimant regarding address update, update contact list, and communicate with claims vendor regarding same (.2); work on revisions and finalization of objection to claimants' motion for turnover of proceeds and communications with K. Duff, M. Rachlis, and J. Wine regarding same (2.1); file and serve as per service list (.3); respond to claimant's email and voice message regarding discovery (.1); work with J. Wine on revisions and finalization of joint status on pending motions and discovery motion (1.6); file and serve as per service list (.3).
			Claims Administration & Objections
	MR	5.10	Further work and review of various joint status report, standard discovery and related issues including exchanges with J. Wine regarding these issues (3.9); work on response to turnover motion and several follow up conferences regarding same with J. Wine and K. Duff (7110 South Cornell and 6751 Merrill) (1.2).
			Claims Administration & Objections
10/7/2020	KMP	0.60	Draft and revise notice letter to attorney regarding potential insurance claim at Receivership property (7114 S Cornell) and communicate with K. Duff and J. Wine regarding same (.5); attention to communications with insurer regarding potential claim (.1).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/7/2020	JRW	0.40	Review and revise draft notice letter to law firm regarding claim (7114 S Cornell) and related correspondence with K. Pritchard and K. Duff.  Claims Administration & Objections
10/8/2020	JRW	0.90	Correspond with accountant regarding claimant inquiry (.1); confer with A. Watychowicz regarding claimant inquiries (.3), review of discovery responses and document images from claimant and draft proposed response to same (.5); attention to additional claimant inquiries.  Claims Administration & Objections
	AW	1.00	Respond to claimant's email regarding discovery and update (.1); communicate with claimant regarding claims as listed on master claims spreadsheet (.1); attention to email from claimant regarding address update, update contact list, and communicate with claims vendor regarding same (.2); communicate with J. Wine regarding claimant's premature submission, review and respond to claimant's email regarding discovery (.5); communicate with K. Duff and J. Wine regarding emails from claimants (.1).  Claims Administration & Objections
10/9/2020	JRW	2.20	Telephone conference with claimants' counsel regarding database vendor proposal (.1); review proposal filed by claimants and related email to K. Duff, M. Rachlis and A. Watychowicz (.4); telephone conference with collections counsel regarding settlement proposal (431 E 42nd Place) and related update to K. Duff and A. Porter (.6); confer with insurance agent regarding claim (7114 S Cornell) (.1) and related email to K. Duff regarding deductible (.1); prepare for and telephone conference with counsel regarding claim (7114 S Cornell) (.2) and send notice of receivership letter and cover email to same (.5); telephone conference with K. Duff and insurance agent regarding claim (7114 S Cornell) (.2).  Claims Administration & Objections
	AW	0.20	Respond to claimant's email regarding discovery (.1); communicate with K. Duff and J. Wine regarding information received regarding Houston property and respond to same (.1).  Claims Administration & Objections
	MR	0.20	Attention to proposal and issues regarding proposal for EB document library.  Claims Administration & Objections
10/12/2020	JRW	0.40	Review settlement offer from collections counsel regarding default judgments (431 E. 42nd Pl) and related communications with A. Porter and K. Duff (.2); correspondence to K. Duff and E. Duff regarding insurance deductible (4520 S Drexel) (.2).  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/12/2020	AW	0.20	Attention to follow up email from claimant, communicate with K. Duff and J. Wine regarding same, and respond to email requesting tax update.  Claims Administration & Objections
	MR	0.50	Attention to claimants' reconsideration motion.  Claims Administration & Objections
10/13/2020	JRW	0.90	Study claimants' motion to reconsider (.3); attention to claimant inquiry (.1); research regarding claimant inquiry and related correspondence to A. Watychowicz (.2); review case law regarding potential issue (.3).  Claims Administration & Objections
	AW	0.20	Attention to follow up email from claimant, communicate with K. Duff and J. Wine regarding same, and respond to email requesting several updates (.1); communicate with K. Duff regarding claim received and attention to cover letter (.1).  Claims Administration & Objections
10/14/2020	JRW	0.20	Attention to inquiries from claimant.  Claims Administration & Objections
	AW	0.90	Attention to another follow up from claimant and communicate with K. Duff and J. Wine regarding same and detailed updates (.2); attention to claim received, review same, and prepare description for upload to database (.5); respond to emails from claimants regarding update request and discovery issues (.2).  Claims Administration & Objections
	MR	0.60	Work on draft communication on claims process discovery (.3); attention to reply brief on turnover issues and follow up regarding same (.3)  Claims Administration & Objections
10/15/2020	JRW	0.80	Telephone conference with K. Duff regarding claims process and legal authority (.5); telephone conference with A. Watychowicz regarding communications to claimants regarding invalid email addresses (.3).  Claims Administration & Objections
	AW	5.40	Communicate with K. Duff and J. Wine regarding claims process emailing issues (.2); email claimants to request email address update and mail letter notices to claimants (1.7); communicate with claims vendor regarding

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			addition of new claim (.1); work on bounced emails project relating to claims process communications and call with J. Wine regarding same (3.4).  Claims Administration & Objections
10/15/2020	MR	0.20	Further attention to discovery related issues.  Claims Administration & Objections
10/16/2020	JRW	0.50	Work with A. Watychowicz on communications with claimants (.4); confer with A. Watychowicz regarding claim (.1).  Claims Administration & Objections
10/19/2020	JRW	0.20	Review reply to motion to turnover proceeds from sales.  Claims Administration & Objections
	AW	0.80	Attention to emails from claimants who responded to email update request, update emailing list, and notify claims vendors regarding same (.7); respond to email from claimant regarding discovery issues (.1).  Claims Administration & Objections
	MR	2.00	Research and attention to response to reconsideration motion.  Claims Administration & Objections
10/20/2020	MR	3.00	Further work on response on motion for reconsideration.  Claims Administration & Objections
10/21/2020	MR	5.00	Further work to respond to motion for reconsideration and research various issues regarding same.  Claims Administration & Objections
10/22/2020	JRW	0.20	Exchange correspondence with K. Duff regarding claims analysis.  Claims Administration & Objections
	MR	0.20	Further attention to motion for reconsideration.  Claims Administration & Objections
10/23/2020	JRW	0.50	Study objections to tenth sales motion and related correspondence with K. Duff, M. Rachlis and A. Porter regarding properties covered by motion.  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/23/2020	MR	1.70	Further work on response on motion for reconsideration (1.4); attention to turnover motion and upcoming issues for hearing on claims process (.3).  Claims Administration & Objections
10/24/2020	MR	0.30	Follow up on issues on draft motion for reconsideration and follow up with K. Duff regarding same.  Claims Administration & Objections
10/25/2020	MR	0.60	Attention to email on claims related issues (.2); further work on motion for reconsideration and follow up with K. Duff (.4).  Claims Administration & Objections
10/26/2020	JRW	4.40	Review and work with M. Rachlis and K. Duff on revision and finalization of response to motion to reconsider (1.7); work with M. Rachlis on response to institutional lenders' proposal for EquityBuild documents (2.1); exchange correspondence with K. Duff regarding document vendor proposal and related review of same (.3); email exchange with M. Rachlis regarding upcoming hearing on issues relating to claims process (.2); review proposal for distribution of claims documentation from vendor and send analysis to M. Rachlis and K. Duff (.1).  Claims Administration & Objections
	AW	2.70	Attention to emails from claimants who responded to email update request (.1); follow up with J. Wine regarding response to proposal for EquityBuild documents (.1); study response to motion to reconsider and email counsel regarding revisions (1.1); further revisions to same (.7); work to finalize response, file with court, and serve as per service list (.7).  Claims Administration & Objections
	MR	4.50	Further work on motion for reconsideration issues (1.2); attention to issues regarding document proposal; attention to claims and work with J. Wine regarding same (2.0); further prepare for upcoming hearing on claims process (1.3).  Claims Administration & Objections
10/27/2020	JRW	5.90	Review, revise and finalize response to proposal for EquityBuild documents (.3) and related exchange regarding service (.1); attention to responding to claimant inquiries (.2); study standard claims process discovery, joint submissions, motion and objections in preparation for hearing on claims process motion (1.6); telephone conference with claimant's counsel regarding discovery dispute (.1); conference call with M. Rachlis and K. Duff regarding court's orders and preparation for hearing (.9); related review of outline regarding claims planning (.2); exchange correspondence with potential vendor regarding status of project and pending motion (.1); attend telephonic hearing before Judge Lee regarding claims process (2.4).  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/27/2020	AW	2.10	Email response to claimant regarding access to telephone hearing (.1); follow up with K. Duff and J. Wine regarding requests for update and discovery issues from claimants (.2); proofread response to proposal for EquityBuild documents and email counsel regarding same (.4); further revisions to response and communicate with counsel regarding same (.4); include additional final revisions, finalize response, file with Court, and serve as per service list (.7); communicate with K. Duff and J. Wine regarding claimants' response to service of response to proposal for EquityBuild documents (.2); redact email regarding claimant request and forward same to K. Duff (.1).
			Claims Administration & Objections
	MR	5.20	Further prepare for (2.0) and participate in hearing before Judge Lee regarding claims process (2.4); participate in meeting with K. Duff and J. Wine relating to same (.8).
			Claims Administration & Objections
10/28/2020	JRW	2.20	Study motion to stay, motion for certification of interlocutory appeal, and notice of appeal (1131-41 79th, 6250 Mozart) (.6); correspondence with claimant's counsel regarding proposed vendor (.1); telephone conference with M. Rachlis, A. Porter, and K. Duff regarding hearing on claims motion and related follow-up, claimant's notice of appeal and motions to stay and for certification of interlocutory appeal (1131-41 79th, 6250 Mozart) and status of property sales (1.5).
			Claims Administration & Objections
	AW	0.20	Revise proposed order granting remainder of second restoration motion and email counsel regarding same.
			Claims Administration & Objections
	MR	5.00	Review appellate materials to prepare for meeting (1.0); research regarding same (2.3); participate in meeting with J. Wine, K. Duff and A. Porter regarding motion to stay regarding pending appellate issues and property sales and stay issues (1.5); conference with A. Porter and K. Duff regarding properties (6250 Mozart) (.1) and (1131 E. 79th) (.1).
			Claims Administration & Objections
	AEP	1.40	Teleconference with K. Duff, M. Rachlis, and J. Wine regarding appeal from order granting ninth motion to confirm (1.2); teleconference with Messrs. Duff and Rachlis regarding receivership properties (1131 E 79th and 6250 S Mozart) (.2).
			Claims Administration & Objections
10/29/2020	AEP	1.10	Teleconference with EquityBuild investor regarding procedural status of litigation, claims process, factual background of transactions in which funds were invested, and timeline to completion.
			Claims Administration & Objections



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/29/2020	JRW	1.90	Review information from proposed vendor for hosting EquityBuild documents and related emails with claimant's counsel (.2); attention to responding to claimant inquiries (.7); telephone conference with claimant's counsel regarding strategy for distribution of claims data (.4) and related communications with K. Duff and M. Rachlis (.2); review analysis of caselaw (.4).  Claims Administration & Objections
	AW	0.70	Respond to claimants' inquiries about discovery (.2) and about confirming their claims (.1); remove claimant from mailing list per his request and respond to email (.1); work with K. Duff and J. Wine on updated responses to claimants inquiring about status report (.3).  Claims Administration & Objections
	MR	0.20	Attention to issues on distribution of claims data.  Claims Administration & Objections
10/30/2020	KMP	0.40	Review receivership notices (638 N Avers) and communication with K. Duff regarding same (.2); communicate with K. Duff and J. Wine regarding notice issues in connection with collection notice (4611 S Drexel) (.2).  Claims Administration & Objections
	JRW	0.90	Exchange correspondence regarding proposed vendor (.1); exchange correspondence with K. Duff and A. Watychowicz regarding service of represented claimants (.3); study memorandum in support of motion to stay, legal authority cited therein, and related analysis from K. Duff (1131-41 79th, 6250 Mozart) (.5).  Claims Administration & Objections
	AW	0.40	Respond to claimants' inquiries about confirming their claims (.1); attention to emails from claimants in response to served status report, review claims, and communicate with K. Duff and J. Wine regarding proposed revisions to master claims list (.3).  Claims Administration & Objections
SUBTOTAL:			102.60      29890.00]

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

---

Status Reports

10/1/2020	KMP	4.60	Continue preparation of financial exhibits for 3Q2020 status report. Status Reports
	MR	0.80	Work and review and comment on status reports and communications regarding same. Status Reports
10/2/2020	KMP	3.60	Continue preparation of financial exhibits for 3Q2020 status report. Status Reports
10/5/2020	JRW	0.30	Begin drafting 3rd Quarter status report and related emails to team regarding items needed. Status Reports
10/6/2020	KMP	4.10	Continue working on financial exhibits for 3Q2020 status report, and communicate with EB team regarding same. Status Reports
	JRW	2.00	Drafting of status report for third quarter 2020 (1.8); related emails from K. Pritchard regarding exhibits to same (.1); emails to professionals regarding work performed during third quarter (.1). Status Reports
	JR	1.10	Review email from property management regarding tax payments in 3rd quarter of 2020 and draft report related to 3rd quarter status report (.9); exchange correspondence with property management requesting a comprehensive list of all property tax payments for 2020 (.2). Status Reports
10/7/2020	KMP	2.40	Continue work on financial exhibits for 3Q2020 status report, and communicate with J. Wiine and J. Rak regarding same. Status Reports
	JRW	0.70	Exchange correspondence with K. Duff regarding inclusion of attorneys' lien issue (7114 S Cornell) in third quarter status report (.1); drafting of 3rd quarter status report (.6). Status Reports
	JR	1.50	Draft requested information required for 2020 3rd quarter status report. Status Reports

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/8/2020	KMP	1.30	Continue work on exhibits for 3Q2020 status report. Status Reports
10/9/2020	JRW	1.50	Continued attention to preparation of third quarter 2020 status report. Status Reports
10/12/2020	KMP	0.50	Confer with J. Wine regarding various aspects of status report and revise certain financial exhibits in connection with same. Status Reports
	JRW	4.20	Attention to preparing third quarter 2020 status report and related communications with K. Pritchard regarding exhibits to same. Status Reports
	AW	0.30	Research email traffic for third quarter of 2020 and report to J. Wine regarding same. Status Reports
	JR	2.70	Review and update outstanding property taxes that remain in the EquityBuild portfolio (1.4); prepare and produce requested information to J. Wine regarding 3rd quarter status report (1.3). Status Reports
10/13/2020	KMP	0.50	Additional revisions to financial exhibits in connection with third quarter status report. Status Reports
	JRW	1.20	Continue preparing status report for third quarter 2020 and related exchange with J. Rak regarding sold properties. Status Reports
10/14/2020	KMP	0.30	Confer with J. Wine and E. Duff regarding third quarter status report. Status Reports
	ED	0.30	Review and edit description of reimbursable amounts for third quarter status report (.2), and email correspondence with J. Wine and K. Pritchard regarding same (.1). Status Reports
	JRW	4.60	Attention to preparing third quarter 2020 status report (4.3); related communications with E. Duff regarding restoration status and reporting (.3). Status Reports

Date	Indiv	Hours	Description
10/14/2020	JR	0.20	Exchange correspondence with J. Wine regarding requested property tax information for 2020 3rd quarter status report.  Status Reports
10/15/2020	JRW	4.60	Attention to drafting status report (4.4); related exchange of correspondence with counsel regarding status of insurance matters (.2).  Status Reports
10/16/2020	JRW	0.70	Review revisions to third quarter 2020 status report and related communications with counsel regarding status of matters.  Status Reports
	MR	1.20	Work on status report.  Status Reports
10/18/2020	MR	1.00	Further attention to status report.  Status Reports
10/19/2020	JRW	3.80	Edit draft third quarter status report to incorporate comments from K. Duff and M. Rachlis (3.0); confer with J. Rak regarding tax balances and closed property sales exhibit (.3); assemble exhibits to status report (.5).  Status Reports
	AW	0.70	Communicate with J. Wine regarding preparation of exhibits and prepare final version of master claims list (.4); attention to email from J. Wine regarding discovery issues, review issued discovery and report regarding same (.3).  Status Reports
	MR	0.50	Attention to various issues on status report.  Status Reports
	JR	1.50	Review email from J. Wine and provide requested unsold property information related to 3rd quarter status report (1.2); phone conversation with J. Wine regarding same (.3).  Status Reports
10/20/2020	JRW	2.30	Continued drafting and revising third quarter 2020 status report and related communications with M. Rachlis, K. Duff, J. Rak, A. Watychowicz, additional counsel and accountant (1.3); work with A. Watychowicz to assemble exhibits to status report (1.0).  Status Reports
	AW	0.80	Review draft exhibits, work on finalization of selected exhibits, and communicate with J. Wine regarding possible revisions (.4); communicate with J. Wine regarding master claims list and agreed on format (.1); finalize

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			exhibits 1-8 and email J. Wine regarding same (.3). Status Reports
10/20/2020	MR	1.10	Further review and comment on status report and follow up with J. Wine and K. Duff. Status Reports
	JR	0.30	Exchange correspondence with J. Wine relating to 3rd quarter 2020 status report and requested information regarding sold taxes for property (431 E 42nd). Status Reports
10/28/2020	JRW	0.30	Confer with A. Watychowicz regarding finalization and filing of status report (.1) and revise same (.2). Status Reports
10/29/2020	JRW	0.50	Revise exhibit to third quarter status report (.2); work with A. Watychowicz and K. Duff on cover email to claimants (.3). Status Reports
	AW	1.40	Proofread status report and communicate with counsel regarding revisions (.7); email exchange regarding transmittal message to claimants (.1); finalize quarterly status report, file with court, and serve as per service list (.6). Status Reports
SUBTOTAL:			[59.40          12745.00]

Tax Issues

10/12/2020	KMP	0.30	Review account ledgers and communicate with tax administrator regarding certain transactions from Receiver's account in connection with preparation of tax returns. Tax Issues
10/14/2020	KMP	0.40	Attention to receipt of electronic copy of Receivership 2019 tax returns from tax administrator and communications regarding same (.2); communications with tax administrator and accountant transmitting form 1099-S from recent sale of property (6437 S Kenwood) (.2). Tax Issues
10/21/2020	KMP	0.20	Forward form 1099-S relating to sale of property (7110 S Cornell) to tax administrator and accountant. Tax Issues

Date   Indiv   Hours   Description

---

SUBTOTAL:

[ 0.90                    126.00]

399.60                    \$97,469.00

Other ChargesDescriptionBusiness Operations

Photocopies for October 2020	25.00
Online research for October 2020	405.53
Software licenses (Google - \$96.00; InSynq - \$266.50)	362.50

SUBTOTAL: [ 793.03]

Total Other Charges \$793.03

Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Jodi Wine	90.00	260.00	\$23,400.00
Ania Watychowicz	32.20	140.00	\$4,508.00
Justyna Rak	121.40	140.00	\$16,996.00
Kathleen M. Pritchard	33.10	140.00	\$4,634.00
Andrew E. Porter	57.70	390.00	\$22,503.00
Ellen Duff	15.90	390.00	\$6,201.00
Michael Rachlis	49.30	390.00	\$19,227.00

**SUMMARY**

Legal Services	\$97,469.00
Other Charges	\$793.03
<b>TOTAL DUE</b>	<b>\$98,262.03</b>



# Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
SUITE 900  
CHICAGO, ILLINOIS 60605

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

February 12, 2021

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.6622128

Legal Fees for the period November 2020	\$111,345.00
Expenses Disbursed	\$2,763.36
<b>Due this Invoice</b>	<b>\$114,108.36</b>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
<u>Accounting/Auditing</u>					
11/2/2020	KMP	0.80	Review numerous bank statements for Receivership accounts (.6); communicate with E. Duff to forward September financial schedules for Receiver's accounts (.2).		
			Accounting/Auditing		
11/11/2020	KMP	0.40	Confer with K. Duff and J. Rak regarding deposit of check from title company to property account (7201 Dorchester).		
			Accounting/Auditing		
11/12/2020	KMP	1.60	Record transactions, review account statements, and reconcile Receiver's accounts.		
			Accounting/Auditing		
SUBTOTAL:				[ 2.80	392.00]
<u>Asset Analysis &amp; Recovery</u>					
11/2/2020	AW	0.40	Research regarding settlement statement (6217 S Dorchester) and communicate with J. Wine and K. Duff regarding same.		
			Asset Analysis & Recovery		
11/8/2020	JR	3.20	Compare and complete analysis of June property reports.		
			Asset Analysis & Recovery		
11/9/2020	JR	1.30	Review property reports and complete analysis with accountant reports (1.1); exchange correspondence with E. Duff regarding same and indicate discrepancy regarding property report (7749 Yates) (.2).		
			Asset Analysis & Recovery		
11/12/2020	JR	2.50	Review email from E. Duff and respond accordingly regarding review of June reports (.1); study property reports for June (2.1); exchange correspondence with E. Duff providing details and comments related to review and discrepancies found on reports (.3).		
			Asset Analysis & Recovery		
11/13/2020	JR	0.60	Review email from accountant regarding discrepancies found in reports, review additional reports and respond accordingly requesting updated reports.		
			Asset Analysis & Recovery		

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
11/19/2020	JR	0.20	Review email from E. Duff regarding status of closed properties and July reporting and respond reading same.  Asset Analysis & Recovery		
11/24/2020	JR	2.70	Review property reports for July, compare and analyze for discrepancies with accounting firm July reports.  Asset Analysis & Recovery		
SUBTOTAL:				[10.90	1526.00]

Asset Disposition

11/1/2020	JR	1.60	Draft and update closing documents (7656-58 S. Kingston).  Asset Disposition		
11/2/2020	JRW	0.50	Review objections to tenth sales motion and SEC reply to same.  Asset Disposition		
	JR	6.40	Review and update closing documents for property in preparation for A. Porter review and execution by K. Duff (431 E. 42nd, 816 E. Marquette, 7600 S. Kingston and 7656 S. Kingston) (3.9); exchange correspondence with A. Porter requesting review of same (431 E. 42nd, 816 E. Marquette, 7600 S. Kingston and 7656 S. Kingston) (.1); review leases and update certified rent roll for property (816 E. Marquette) (1.2); prepare notice to tenants regarding same (816 S. Marquette) (.4); exchange correspondence with buyer's counsel regarding requested information for tenants and produce notices to tenants for review and approval (816 E. Marquette) (.2); draft transfer tax declaration form for property (6949 S. Merrill) (.3); prepare transfer tax declaration form in anticipation for closing (431 E. 42nd) (.3).  Asset Disposition		
	AEP	2.30	Review and analyze all title documents associated with receivership property (6217 S Dorchester) and prepare e-mail to J. Wine and K. Duff (.4); review and revise all closing documents associated with prospective sale of receivership property (431 E 42nd) (.7); review and revise all closing documents associated with prospective sale of receivership property (816 E Marquette) (1.2).  Asset Disposition		
	MR	0.30	Attention to intervenor's notice of appeal (7600 Kingston, 7656 Kingston, 6949 Merrill) (.1) attention to SEC submission on tenth sales motion (.2).  Asset Disposition		

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/3/2020	AW	0.50	Finalize Receiver's notice of property sales, file with the court, and serve as per service list.  Asset Disposition
	JR	6.20	Review email from A. Porter and produce closing documents for execution to K. Duff (431 E. 42nd and 816 E. Marquette) (1.3); complete execution with K. Duff and A. Watychowicz regarding same (431 E. 42nd and 816 E. Marquette) (.9); exchange correspondence with buyer's counsel providing title company closer contact information related to closing (431 E. 42nd) (.1); exchange correspondence with K. Pritchard related to payment for property related to fire (638 N. Avers) (.2); final review of lien waivers for properties (431 E. 42nd and 816 E. Marquette) and request execution from broker (.1); review notice to tenants for property (816 E. Marquette), exchange correspondence with A. Porter regarding same and forward to property management for execution (816 E. Marquette) (.3); review email from property management and provide requested information regarding post-sale rents for property (7508 S. Essex) (.1); request executions of documents from A. Porter for closing disclosure statements for properties (431 E. 42nd and 816 E. Marquette) (.1); review email from buyer's counsel, provide requested documents and request buyer information for property (7255 S. Euclid) (.2); review leases and security deposits, update certified rent roll in anticipation of closing (7442 S. Calumet) (.9); prepare notices to tenants regarding same (7442 S. Calumet) (.7); exchange correspondence with property management requesting property and tenant information for anticipated closing (7442 S. Calumet) (.2); review leases and security deposits and update certified rent roll in preparation for closing (7701 S. Essex) (.9); update notices to tenants regarding same (7701 S. Essex) (.2).  Asset Disposition
	AEP	1.90	Analyze public records pertaining to chain of title associated with receivership property (5437 S Laflin) and create outline of issues for analysis by potential substitute title insurer (1.5); read through latest administrative orders forwarded by J. Wine and update closing checklists (.2); read e-mails sent by K. Duff and M. Rachlis regarding relative merits of conveying receivership properties (6949 S Merrill, 7600 S Kingston, and 7656 S Kingston) prior to entry of order staying sales pending appeal and respond thereto (.2).  Asset Disposition
11/4/2020	JRW	1.10	Review and revise response to institutional lender's motion to stay.  Asset Disposition
	AW	2.10	Work with K. Duff, J. Wine, and M. Rachlis on response to motion to stay sales including but not limited to revisions to response, issue of service, finalization, filing, and service.  Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/4/2020	JR	6.00	Review emails from property management and update electronic files relating to closing (7442 S. Calumet) (.2); follow up correspondence with broker requesting lien waivers for closings (816 E. Marquette and 431 E. 42nd) (.1); update certified rent roll related to missing leases and subsidy agreements for property (7701 S. Essex) (.6); exchange correspondence with property management requesting same (7701 S. Essex) (.2); update notices to tenants for property (7701 S. Essex) (.5); exchange correspondence with buyer's counsel requesting approval of same (7701 S. Essex) (.1); review closing confirmations for properties (7600 and 6756 S. Kingston) and update electronic files (.2); exchange correspondence with all parties notifying of same (.1); review closing confirmations for properties (7442 S. Calumet and 7701 S. Essex) and update electronic files (.2); exchange correspondence with all parties regarding same (7442 S. Calumet and 7701 S. Essex) (.1); review leases, security deposits for property in preparation for closing (7600 S. Kingston) (1.3); update draft certified rent roll regarding same (7600 S. Kingston) (1.4); exchange correspondence with property management requesting missing leases and subsidy agreements in anticipation for closing (7600 S. Kingston) (.1); review leases and security deposits for property in anticipation for closing (7656 S. Kingston) (.6); update draft certified rent roll relating to same (7656 S. Kingston) (.3).
			Asset Disposition
	AEP	2.90	Review, analyze, and prepare additional modifications to draft purchase and sale contract associated with receivership property (.4); teleconference with counsel for prospective purchaser of receivership properties (7600 S Kingston, 7656 S Kingston) regarding potential closing date (.2); teleconference with counsel for prospective purchaser of receivership property (6949 S Merrill) regarding closing date (.1); summarize revisions needed to title commitments on receivership properties (7600 S Kingston, 7656 S Kingston) and convey same to title insurer (.2); teleconference with new title insurer regarding conditions under which said insurer will agree to issue title commitment on receivership property (7237 S Bennett), prepare title order, and communicate status of transaction to purchaser's counsel (.5); prepare first draft of eleventh motion to confirm sales (7237 S Bennett) (1.5).
			Asset Disposition
11/5/2020	KMP	0.30	Confer with A. Watychowicz regarding procedural issues for lenders' and intervenor's appeals (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill).
			Asset Disposition
	JRW	1.00	Prepare for and participate in hearing on institutional lenders' motion to stay execution of order granting ninth sales motion (.4); work with A. Watychowicz on docketing of appellate deadlines, related review of orders and rules, and correspondence with M. Rachlis regarding docketing statement (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.6).
			Asset Disposition

Date	Indiv	Hours	Description
11/5/2020	JR	5.80	Attend closing of vacant lot (431 E. 42nd) (3.4); exchange correspondence with all parties confirming the closing of vacant lot (431 E. 42nd) (.1); update closing documents related to property (7442 S. Calumet) (.9); follow up correspondence with broker requesting broker lien waiver for closing (431 E. 42nd) (.1); review email from buyer's counsel regarding scheduling of closing (4533 S. Calumet) and respond accordingly (.2); review closing statement from sale of properties regarding tax payments (1.1).  Asset Disposition
	AEP	4.20	Prepare e-mail to prospective new title insurer regarding factual background of litigation and legal effect of lis pendens filed in connection with same (.2); complete title application work for receivership property (4317 S Michigan) (.4); e-mail communications with counsel for prospective purchaser of receivership property (4533 S Calumet) regarding scheduling of closing (.1); continue analyzing public records and preparing memorandum to prospective new title insurer requesting consideration of waiver of title exceptions appearing on current version of title commitment for single-family homes (3.5).  Asset Disposition
	AW	0.60	Attention to filings in appellate court and update appeal docket (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.3); research and communicate with K. Duff regarding lack of presentment date for motion to stay sales, docket deadlines related to same (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2); attention to newly filed motion to intervene and communicate with counsel regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill) (.1).  Asset Disposition
	AW	0.60	Compile all appellate pleadings, research appellate rules, and communicate with M. Rachlis regarding deadlines scheduled by appellate court and rules (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill).  Asset Disposition
11/6/2020	JRW	2.30	Review and revise multiple drafts of response to lenders' objections to 10th sales motion (1.8); review and revise declaration (.2); work with K.Pritchard to finalize and file response brief (.3).  Asset Disposition
	AW	1.30	Study reply in support of tenth sales motion and declaration and email counsel regarding revisions (.9); compile exhibits to same and prepare transmittal email to claimants (.4).  Asset Disposition
	JR	5.10	Exchange correspondence with property management requesting additional tax payment information related to EquityBuild estate (.1); review closing statements from closed properties and determine overall total tax payment

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			for each property, update report (3.8); review outstanding tax balances and update report for unsold properties (.7); review tax payments completed by property management and update report (.2); exchange correspondence with K. Duff and K. Pritchard regarding same (.3).
			Asset Disposition
11/6/2020	AEP	4.20	Finalize review and analysis of remaining properties associated with title exceptions in single-family home portfolio and preparation of memorandum to prospective new title insurer regarding potential waiver of exceptions (2.3); continue revising draft eleventh motion to confirm sales and prepare e-mail to title insurer requesting revisions to title commitment consistent with prospective language of confirmation order (.7); teleconference with K. Duff and J. Wine regarding receivership property (6217 S Dorchester) and prepare brief series of paragraphs with exhibits explaining chain of title (1.2).
			Asset Disposition
	KMP	0.50	Prepare exhibits for reply in support of tenth motion to approve property sales, finalize motion, and file electronically.
			Asset Disposition
11/8/2020	JR	0.80	Update closing documents for upcoming closing (7701 S. Essex).
			Asset Disposition
11/9/2020	JRW	2.50	Review court's order regarding motions to stay and related correspondence with team (1.2); review draft motion (.1); exchange correspondence with A. Porter regarding administrative orders at closing (431 E 42nd Place) (.1); conference call with A. Porter, K. Duff and M. Rachlis regarding closings of properties (7600 S Kingston, 7656 S Kingston, 6949 S Merrill) and motion to set aside default judgment (4611 S Drexel) (.9); review intervenor's motion for return of earnest money (7600 S Kingston, 7656 S Kingston, 6949 S Merrill) (.2).
			Asset Disposition
	JR	3.70	Review email correspondence from buyer's counsel requesting updated rent rolls for closings (7600 and 7656 S. Kingston) (.1); update certified rent roll regarding same with unit information (7600 and 7656 S. Kingston) (.6); review subsidy contract for property and request same from property management (7656 S. Kingston) (.3); exchange correspondence with A. Porter requesting final approval of closing documents for upcoming closings (7656 S. Kingston, 7600 S. Kingston, 7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill) (.2); review subsidy contracts for property (7600 S. Kingston) (.3); exchange further correspondence with property management requesting same (7600 S. Kingston) (.1); exchange correspondence with buyer's counsel providing requested subsidy contracts for properties (7600 and 7656 S. Kingston) (.1); update closing documents for property (6949 S. Merrill) (.9); update notices to tenants and request approval from purchaser relating to properties (7600 and 7656 S. Kingston) (.5); review emails and exchange

Date    Indiv Hours Description

---

correspondence with A. Porter relating to possible delay of closings (7600 S. Kingston, 7656 S. Kingston and 6949 S. Merrill) (.2); follow up with the title company water department on water applications previously submitted for processing (816 E. Marquette, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill, 7600 S. Kingston and 7656 S. Kingston) (.2); exchange correspondence with property management providing latest closing confirmations for various properties (816 E. Marquette, 7442 S. Calumet, 7701 S. Essex, 4533 S. Calumet) (.2).

Asset Disposition

11/9/2020    AEP    4.10    Teleconference with prospective purchaser of receivership property (6949 S Merrill) regarding potential advancement of closing date and appeal filed by intervenor (.3); communications with former EquityBuild title insurer regarding obstacles associated with request for hold harmless indemnity (.2); teleconference with K. Duff, M. Rachlis, and J. Wine regarding closing sales of receivership properties and resolution of issues associated with vacated default judgments entered against receivership property (431 E 42nd Street) (.9); review, revise, and inventory all closing documents associated with prospective sale of receivership property (7442 S Calumet) (.9); communications with counsel for prospective purchaser of receivership property (4533 S Calumet) regarding scheduling of closing (.2); teleconference with J. Rak regarding preparation for, and status of, next six scheduled closings (.2); review, revise, and inventory closing documents relating to prospective conveyance of receivership property (7701 S Essex) (.8); teleconference with counsel for prospective purchasers of receivership properties subject to motion to stay (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) regarding possibility of rescheduling closings (.6).

Asset Disposition

MR    3.70    Conferences regarding closings and issues on stays and appeal with A. Porter, K. Duff and J. Wine (7600 Kingston, 7656 Kingston and 6949 Merrill) (.8); attention to issues regarding intervenor's motion on escrow and issues regarding responses to stay (7600 Kingston, 7656 Kingston and 6949 Merrill) (2.9).

Asset Disposition

11/10/2020    JRW    3.80    Review and revise draft opposition to intervenor's motion to stay (7600 Kingston, 7656 Kingston, 6949 Merrill) (1.8); legal research regarding authority cited in motion to stay argument (2.0).

Asset Disposition

AW    2.80    Work on finalization of closing documents for seven properties (4315 S Michigan, 4533 S Calumet, 6459 S Merrill, 7442 S Calumet, 7600 S Kingston, 7656 S Kingston, 7701 S Essex) (1.6); proofread opposition to third party motion to stay and email M. Rachlis regarding revisions (7600 Kingston, 7656 Kingston, 6949 Merrill) (1.1); communicate with K. Duff regarding docketing statement (7600 Kingston, 7656 Kingston, 6949 Merrill) (.1).

Asset Disposition



Date    Indiv Hours Description

---

11/10/2020 JR    7.30 Review email from the title company requesting water meter pictures for processing of water applications (816 S. Marquette and 4533 S. Calumet) (.1); exchange correspondence with property management regarding same (816 S. Marquette and 4533 S. Calumet) (.1); exchange correspondence with broker requesting execution of lien waivers for closings (7600 S. Kingston and 7656 S. Kingston) (.1); exchange correspondence with A. Porter regarding upcoming closings and rescheduling of same (7600 Kingston and 6949 Merrill) (.2); call with A. Porter and J. Porter regarding upcoming closings and attending closings (1.0); update closing documents related to properties (7600 Kingston, 7656 Kingston, 6949 S. Merrill, 4533 Calumet, 4317 Michigan) (2.9); exchange correspondence with A. Watychowicz relating to assisting in execution of closing documents (7600 Kingston, 7656 Kingston, 6949 S. Merrill, 4533 Calumet, 4317 Michigan) (.3); exchange correspondence with A. Porter regarding same (.1); review email from buyer's counsel regarding rent payment post-closing (6558 S. Vernon) (.1); request information from property management regarding same (6558 S. Vernon) (.1); exchange correspondence with property management requesting rent roll and property information in preparation for closing (6949 S. Merrill) (.1); review rent roll, leases and security deposits for property (6949 S. Merrill) (1.7); request additional tenant leases, subsidy agreements and security deposit information for same (6949 S. Merrill) from property manager (.3); review email from buyer's counsel requesting property information (4533 S. Calumet) (.1); request same from property manager and provide to buyer's counsel (4533 S. Calumet) (.1).

Asset Disposition

AEP    7.00 Review and revise all documents of conveyance in connection with anticipated closing of receivership property (7600 S Kingston) (1.1); review and revise closing documents associated with prospective conveyance of receivership property (6949 S Merrill) (1.0); teleconference with J. Rak regarding all outstanding closing-related issues associated with receivership properties (7600 S Kingston, 7656 S Kingston, 6949 S Merrill, 7442 S Calumet, 7701 S Essex) and preparation therefor (.7); prepare all notarization-required closing documents for next batch of sales of receivership properties (7600 S Kingston, 7656 S Kingston, 6949 S Merrill, 7442 S Calumet, 7701 S Essex) (2.5); review and revise remaining closing documents associated with prospective sale of receivership property (4533 S Calumet) (.8); review and revise remaining closing documents relating to prospective sale of receivership property (4515 S Michigan) (.7); review revised surveys and approve same for receivership properties (7600 S Kingston, 7656 S Kingston, 6949 S Merrill, 7742 S Calumet, and 7701 S Essex) (.2).

Asset Disposition

MR    3.10 Attention to various appellate filings (.3); further attention to issues in regards to response on intervenor's motion to stay and review and revise same (7600 Kingston, 7656 Kingston, 6949 Merrill) (2.8).

Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/11/2020	JRW	1.40	Review and revise multiple revisions of opposition to intervenor motion to stay (1.0); related conference with A. Porter and K. Duff (.4).  Asset Disposition
	AW	1.90	Work with K. Duff, M. Rachlis, and J. Wine on finalization of opposition to third party motion to stay, finalize opposition, and serve on defendant (7600 Kingston, 7656 Kingston, 6949 Merrill).  Asset Disposition
	JR	3.80	Prepare closing documents for execution for various properties (4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill, 7600 S. Juneway, 7656 S. Kingston) (1.3); meeting with K. Duff regarding execution of closing documents for same (4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill, 7600 S. Juneway, 7656 S. Kingston) (1.2); review email from property management related to previous request for property reports in preparation for closing (6949 S. Merrill) and update electronic files (.2); review email from property management regarding postponement of closing (6949 S. Merrill) (.1); notify all parties of cancellation of closings (6949 S. Merrill, 7600 S. Kingston and 7656 S. Kingston) (.2); review requested water meter picture for property (4533 S. Calumet), update electronic files and forward to the title company for processing (.2); exchange correspondence with property management (PSR) requesting property information, rent roll and subsidy information in preparation for closing (4317 S. Michigan) (.1); exchange correspondence with K. Pritchard regarding deposit of check for property (7201 S. Dorchester) (.3); review email from property management regarding tax payments to date by property management and update electronic files (.2).  Asset Disposition
	MR	2.60	Further work on response to intervenor's motion to stay and followup regarding same with K. Duff, J. Wine and A. Watychowicz.  Asset Disposition
	AEP	2.40	Teleconference with prospective purchaser of receivership property (6949 S Merrill) regarding need to postpone closing in view of judicial order indicating that motion to stay would be taken under advisement (.4); review closing statement from sale of receivership property (7201 S Dorchester) and respond to K. Duff regarding basis for escrow refund check (.1); communications with title underwriter regarding status of litigation involving claimant who recorded lis pendens against receivership property (4315 S Michigan) (.2); edit and revise draft memorandum in opposition to motion to stay sales of receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) (1.2); teleconference with K. Duff, M. Rachlis, and J. Wine regarding issues associated with motion to stay sales of receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) and logistical effects thereof (.3); read latest administrative orders entered in

Date	Indiv	Hours	Description
			cases pending against former receivership properties (5618 S King, 6356 S California, 5001 S Drexel) and forward same to counsel for purchasers (.2).
			Asset Disposition
11/12/2020	KMP	0.40	Review documentation regarding property purchase (8236 Ellis) to verify sale price in response to institutional lender's inquiry relating to same, and communicate with K. Duff and J. Wine regarding same.
			Asset Disposition
	JR	3.00	Review email from property management regarding requested leases for property in preparation for closing (6949 S. Merrill), review leases, update electronic files and request further clarification on lease discrepancies (.7); review email from property management regarding requested water meter information for property (4533 S. Calumet) and request clarification for same (.1); review email from property management regarding requested property information in preparation for closing and update electronic files (4317 S. Michigan) (.1); review email from property management related to payment of property taxes for all properties in estate from onset of receivership and save in electronic files (.1); review email from the title company water department regarding completed water application and update electronic files (7656 S. Kingston) (.1); review email from the title company water department regarding completed water application and update electronic files (7600 S. Kingston) (.1); review email from property management regarding requested water meter pictures for properties (4317 S. Michigan and 816 S. Marquette) and provide to the title company for processing (.2); update notice letters to tenants of property (7656 S. Kingston and 7600 Kingston) (.6); exchange correspondence with property management requesting execution of same as well as lien waivers for properties (7656 S. Kingston and 7600 Kingston) (.1); exchange correspondence with property management and the title company who is requesting additional pictures of water meters for properties (4317 S. Michigan and 816 S. Marquette) (.2); exchange correspondence with property management requesting property financial reporting in anticipation of closing (7656 S. Kingston and 7600 Kingston) (.1); update notices to tenants for property (6949 S. Merrill) (.6) (cont'd in next entry).
			Asset Disposition
	JR	2.80	(Cont'd from previous entry) Exchange correspondence with buyer's counsel regarding upcoming closings (7442 S. Calumet, 7701 S. Essex), requesting updated surveys (.1); request same from surveying company (7442 S. Calumet, 7701 S. Essex) (.1); review email from buyer's counsel requesting updated surveys related to upcoming closings and provide same (7600 Kingston, 7656 S. Kingston) (.2); final review of lien waivers and provide property management with lien waivers and notices to tenants for execution in preparation for closing (816 E. Marquette, 7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill) (.4); request property income information for anticipation closings from property management (7442 S. Calumet, 7701 S. Essex, 6949 S. Merrill) (.2); exchange correspondence with A. Porter regarding signing of document in preparation for closing (4317 S. Michigan)

Date	Indiv	Hours	Description
------	-------	-------	-------------

(.1); further correspondence with property management regarding tenant residing at property (6949 S. Merrill) related to anticipated closing (.3); update notice letter to tenants of property (4318 S. Michigan) and request approval from buyer (.3); review broker lien waivers for various properties (816 E. Marquette, 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex) and request execution of same from broker (.3); review requested surveys, update electronic files and provide to buyer's counsel regarding properties (7600 Kingston, 7656 S. Kingston) (.2); update notices to tenants and request approval from buyer's counsel related to property (4533 S. Calumet) (.4); review email from the title company regarding request of water meter pictures for property, update electronic files and request same from property management (6949 S. Merrill) (.2).

Asset Disposition

11/13/2020	AW	1.20	Work with K. Duff, M. Rachlis, and J. Wine on surrepley to motion to stay.
------------	----	------	--

Asset Disposition

	JR	5.90	Review email from eviction counsel regarding tenants in eviction status and provide new buyer information for property (1700 Juneway) (.1); review email from the title company water department regarding status of water application (7442 S. Calumet) (.1); review requested property financial reports in preparation for closing (7442 S. Merrill, 6949 S. Calumet and 7701 S. Essex) and update electronic files (.3); review requested property financial reports in preparation for closing (7600 S. Kingston and 7656 S. Kingston) and update electronic files (.3); review requested and executed broker lien waivers and update electronic files (816 E. Marquette, 4317 S. Michigan, 4533 S. Calumet, 7442 S. Calumet, 7701 S. Essex) (.3); review email from the title company regarding earnest money for properties (7600 Kingston, 7656 S. Kingston and 6949 S. Merrill), respond accordingly and further exchange correspondence with A. Porter regarding same (.1); review delinquency and ledger pertaining to proration of rents for property (7701 S. Essex), update certified rent roll and closing figures in preparation for closing (7701 S. Essex) (.7); review delinquency report, ledger and update certified rent roll and rent prorations for property in anticipation for upcoming closing (7442 S. Calumet) (.8); follow up correspondence with property management regarding documents needed for closing (7442 S. Calumet and 7701 S. Essex) (.1); draft tax declaration in preparation for closing (7701 S. Essex) (.2); finalize remainder of closing documents in preparation for closing and upload to electronic files (7701 S. Essex) (.9); finalize remainder of closing documents in preparation for closing and upload to electronic files (7442 S. Calumet) (.9); review delinquency report, ledger and update certified rent roll in preparation for closing (6949 S. Merrill) (1.1).
--	----	------	--

Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/14/2020	MR	3.00	Further review and revise draft motion to dismiss intervenor's appeal (7600 Kingston, 7656 Kingston, 6949 Merrill).  Asset Disposition
11/15/2020	JRW	0.90	Review latest revisions and further revise motion to dismiss appeal (7600 Kingston, 7656 Kingston, 6949 Merrill).  Asset Disposition
	MR	1.50	Review draft motion to dismiss appeal and work on docketing statement and follow up regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill).  Asset Disposition
	AEP	0.60	Read and respond to e-mail inquiry from prospective purchaser of receivership property (4611 S Drexel) regarding procedural status of motion to confirm and potential timeline for closing (.2); review settlement statements for closings for receivership properties (7701 S Essex and 7442 S Calumet) to confirm accuracy (.2); teleconference with J. Rak regarding final preparation for closings of receivership properties (7701 S Essex and 7442 S Calumet) (.1); prepare e-mail to counsel for purchasers of receivership properties subject to motion to stay (6949 S Merrill, 7600 S Kingston, and 7656 S Kingston) regarding status of ruling by court and potential for further delays (.1).  Asset Disposition
11/16/2020	JRW	1.80	Research regarding appellate rules and related communications with EquityBuild team and telephone conference with clerk of appellate court (7600 Kingston, 7656 Kingston, 6949 Merrill).  Asset Disposition
	AW	4.10	Work on motion to dismiss appeal and docketing statement (7600 Kingston, 7656 Kingston, 6949 Merrill) (2.3); communicate with K. Pritchard regarding revisions to motion, table of authorities, disclosure with exhibit, and docketing statement and work to finalize documents for filing (7600 Kingston, 7656 Kingston, 6949 Merrill) (1.8).  Asset Disposition
	JR	6.60	Attend closing (7701 S. Essex) (2.4); attend closing (7442 S. Calumet) (2.8); exchange correspondence with buyer providing all leases and subsidy agreements related to properties (7701 S. Essex and 7442 S. Calumet) (.2); provide closing details to all parties related to closings (7701 S. Essex and 7442 S. Calumet) (.1); exchange correspondence with property management notifying of canceled closing (6949 S. Merrill) (.2); exchange correspondence with property management notifying of canceled closings (7600 S. Kingston and 7656 S. Kingston) (.2); exchange correspondence with brokers notifying of closing cancellations and provide closing statement from closings (7442 S. Calumet and 7701 S. Essex) (.2); review documents,

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			organize and upload to electronic files (7701 S. Essex) (.4); exchange correspondence with the title company regarding missing closing documents related to closing (7701 S. Essex and 7442 S. Calumet) (.1).
			Asset Disposition
11/16/2020	AEP	1.70	Teleconference with K. Duff and M. Rachlis regarding potential closing of sales of receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) pending judicial consideration of motion to stay (.4); assist with closing of receivership property, including prorations and final review of settlement statement (7701 S Essex) (.5); assist with closing of receivership property, including prorations and final review of settlement statement (7442 S Calumet) (.3); read e-mail inquiry from M. Rachlis regarding ownership structures of corporate entities, review operating agreements in files, and prepare response thereto (.3); communications with counsel for purchasers of receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) regarding intention to close (.2).
			Asset Disposition
11/17/2020	KMP	0.20	Review bank records to confirm receipt of proceeds from sales of properties (7701 S Essex, 7442 S Calumet) and communicate with J. Rak regarding same.
			Asset Disposition
	JR	4.70	Review emails, produce, organize and upload electronic files related to closing documents for rescheduled closings (7600 S. Kingston, 7656 S. Kingston and 6949 S. Merrill) (2.3); review email from the title company water department regarding a completed water application for property and update electronic files (6949 S. Merrill) (.2); review email from title company regarding closing documents from closing and update electronic files (7701 S. Essex and 7442 S. Calumet) (.1); exchange correspondence with A. Porter and the title company regarding water application for property in preparation for closing (4317 S. Michigan) (.3); exchange correspondence with property management requesting updated reports for property in anticipation of closing (816 E. Marquette) (.2); review and update certified rent roll for closing (816 E. Marquette) (.7); update preliminary closing statement and exchange correspondence with closer at the title company providing executed closing documents for closing (816 E. Marquette) (.6); review email from eviction attorney and provide requested information for buyer on previously sold property (7201 S. Constance) (.1); review email from K. Duff related to request to review purchase and sale agreement and provide a compare analysis of same (1102 Bingham) (.2).
			Asset Disposition
	MR	0.50	Attention to issues on intervenor's motion to dismiss and attention to various appellate filings and upcoming issues (7600 Kingston, 7656 Kingston, 6949 Merrill).
			Asset Disposition

Date    Indiv Hours Description

---

11/17/2020 AEP    1.60 Teleconference with receivership broker regarding cancellation of closings of receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) in wake of judicial order and status of remaining scheduled closings (.2); prepare environmental property questionnaire responses for receivership properties (7600 S Kingston and 7656 S Kingston) in connection with application for commercial extended coverage (.4); read and revise proposed responses to counsel for institutional lender regarding status of receivership properties (8332-58 S Ellis) (.2); read and respond to letter from title company regarding remaining amounts due in connection with final water bill issued for receivership property (5618 S King) (.1); teleconference with prospective new title insurer regarding issues associated with preparation of title commitment for single-family home portfolio (.5); prepare correspondence to receivership brokers associated with single-family home portfolio regarding preparation for marketing effort (.2).

Asset Disposition

JRW    0.10 Review court order regarding intervenor's motion (7600 Kingston, 7656 Kingston, 6949 Merrill).

Asset Disposition

11/18/2020 KMP    0.20 Review bank records to confirm receipt of proceeds from sale of property (816 S Marquette) and communicate with J. Rak regarding same.

Asset Disposition

JRW    1.00 Exchange correspondence with A. Porter regarding status of marketing of properties (single-family portfolio) (.1); exchange correspondence and pull documentation filed in support of claims against property (1108 Bingham) (.3); confer with A. Watychowicz regarding calculation of appeal deadlines and related review of appellate court rules (7600 Kingston, 7656 Kingston, 6949 Merrill, 1131 E 79th, 6250 Mozart) (.4); review intervenor's reply memorandum and related correspondence with M. Rachlis and K. Duff (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2).

Asset Disposition

JR    5.50 Review ledger, delinquency report and update certified rent roll for closing (816 E. Marquette) (.7); attend closing (816 E. Marquette) (3.3); exchange correspondence with all parties regarding confirmation of closing (816 E. Marquette) (.2); call with K. Duff and A. Porter relating to status of single family home portfolio and plan of action (.5); request updated due diligence documents from property management for single family homes (.1); prepare tax declaration form and forward to closer regarding property (816 E. Marquette) (.3); review motion and exchange correspondence with A. Porter regarding motion to confirm sale (1102 Bingham) (.3); review email from E. Duff and provide requested settlement statement from prior closings (6558 S. Vernon and 5618 S. Martin Luther King) (.1).

Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/18/2020	AEP	3.50	<p>Read and respond to e-mail inquiry from counsel for prospective purchaser of receivership property (4611 S Drexel) regarding anticipated timing of closing and remaining legal obstacles thereto (.1); review and reconcile preliminary closing statement in connection with closing of sale of receivership property (816 E Marquette) (.1); read and respond to request from K. Duff for additional information pertaining to termination of contract to purchase receivership property (8326-58 S Ellis) (.1); review administrative orders entered in proceedings affecting current and former receivership properties (6558 S Vernon, 7600 S Kingston, 7656 S Kingston, and 7109 S Calumet), update tracking spreadsheet, and disseminate to counsel for purchasers (.2); prepare e-mail to title underwriter enclosing and explaining spreadsheets containing information pertaining to single-family home portfolio (.2); review and analyze proposed rent prorations, compute water prorations, and perform final review of settlement statement in connection with closing of receivership property (816 E Marquette) and issue approval to escrow agent (.4); research and respond to K. Duff regarding earnest monies deposited by defaulted purchaser of receivership properties (6949 S Merrill, 7600 S Kingston, 7656 S Kingston) (.1); read and respond to e-mail from K. Duff regarding request for information pertaining to original termination of contract to purchase receivership property (8326-58 S Ellis) (.1); read and respond to purchaser of receivership property (7701 S Essex) regarding management company failure to deliver all keys to property (.2); teleconference with K. Duff and J. Rak regarding final preparation for initiation of marketing of single-family home portfolio (.4); (Continued in next entry)</p> <p>Asset Disposition</p>
	AEP		<p>(Continued from previous entry) Teleconference for title company underwriter regarding issues associated with preparation of title commitments for single-family home portfolio (.3); prepare preliminary draft of motion to confirm sale of receivership property (1102 Bingham) (1.3).</p> <p>Asset Disposition</p>
	AW	0.10	<p>Attention to third party reply in support of motion to stay and share same with counsel (7600 Kingston, 7656 Kingston, 6949 Merrill).</p> <p>Asset Disposition</p>
	AW	0.20	<p>Communicate with J. Wine regarding appellate court rules relating to docketing statement and related deadlines and update docket (7600 Kingston, 7656 Kingston, 6949 Merrill).</p> <p>Asset Disposition</p>
11/19/2020	KMP	0.60	<p>Study correspondence from asset holder regarding potential disbursement of assets and prepare draft response to same (.4); communicate with E. Duff and J. Rak regarding property manager's final reports for sold properties (8201 Kingston, 7749 Yates) and forward reports (.2).</p> <p>Asset Disposition</p>



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/19/2020	AW	3.40	Attention to rule to show cause entered in third party appeal, notify counsel, and update docket (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2); proofread and cite-check motion to dismiss intervenor's appeal, prepare table of contents and table of authorities, and communicate with counsel regarding same and timing (7600 Kingston, 7656 Kingston, 6949 Merrill) (1.9); further revisions to motion to dismiss intervenor's appeal (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2); finalize motion to dismiss intervenor's appeal, file with the court, and serve as per service list (7600 Kingston, 7656 Kingston, 6949 Merrill) (1.1).  Asset Disposition
	JR	3.70	Review email from property management regarding single family home due diligence documents (.1); review uploaded documents regarding same and further exchange correspondence with property management relating to missing items (.3); further review email from property manager requesting buyer information for closed properties (7442 S. Calumet, 7701 S. Essex and 816 E. Marquette) and provide same (.2); review email from K. Duff related to October statements and previous closings (5618 S. King and 6558 S. Vernon) and respond accordingly (.1); review income and loss statements received from the property manager and update electronic files related to single family homes (1.1); review emails and follow up correspondence with buyer and buyer's counsel regarding status of tenant notices related to property (4533 S. Calumet) (.2); finalize tenant notice letters for property in anticipation for closing (4533 S. Calumet) (.9); review leases and update certified rent roll for anticipated closing (4533 S. Calumet) (.8).  Asset Disposition
	AEP	0.30	Read reply in support of motion to stay sales of receivership properties (6949 S Merrill, 7600 S Kingston, and 7656 S Kingston) pending appeal and prepare e-mail to counsel for prospective purchasers regarding timing.  Asset Disposition
	JRW	2.60	Work with K. Duff and M. Rachlis on multiple revisions of motion to dismiss intervenor's appeal (7600 Kingston, 7656 Kingston, 6494 Merrill) (2.3); check record citations in same (7600 Kingston, 7656 Kingston, 6494 Merrill) (.3).  Asset Disposition
	MR	3.50	Further work on motion to dismiss intervenor's appeal and follow up regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill).  Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/20/2020	JR	2.70	Review requested due diligence reports and update electronic files for single family portfolio from property management (.3); finalize review of leases for property (4533 S. Calumet) and update rent roll for closing (.4); review subsidy agreements and update rent roll for closing (4533 S. Calumet) (.4); exchange correspondence with property management requesting missing leases and subsidy agreements for property (4533 S. Calumet) (.2); review updated utility statements requested from property management and update electronic files in preparation for marketing of single family homes (1.3); exchange correspondence with property management requesting missing utility statements regarding single family homes (.1).
			Asset Disposition
	MR	3.30	Attention to bidding procedures on single family homes and follow up (.5); participate in appellate court mediation with intervenor (7600 Kingston, 7656 Kingston, 6949 Merrill) (2.8).
			Asset Disposition
	AEP	1.10	Teleconference with K. Duff regarding outcome of mediation with defaulted buyer of receivership properties (6949 S Merrill, 7600 S Kingston, and 7656 S Kingston) and issues associated with marketing of single-family homes (.3); teleconference with K. Duff and receivership brokers regarding discrepancies in values of single-family homes as between receivership broker and special servicer for institutional lender (.2); teleconference with K. Duff, receivership brokers, and counsel for institutional lenders regarding pricing considerations, timing of commencement of marketing, and allocation issues associated with single-family home portfolio (.6).
			Asset Disposition
11/21/2020	AEP	5.50	Review all relevant background pleadings, contract documents, and correspondence, read intervenor's motion for order regarding disposition of earnest money, prepare first draft of statement of facts to opposition memorandum, and assemble all relevant exhibits (7600 Kingston, 7656 Kingston, 6949 Merrill).
			Asset Disposition
11/22/2020	MR	2.40	Work to review and revise response on motion for escrow monies, research regarding same, and attention to various emails regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill).
			Asset Disposition
	AEP	6.70	Legal research regarding disposition of earnest money associated with receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill), draft, revise, and forward to K. Duff for final review and filing.
			Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/23/2020	JRW	1.60	Multiple revisions of response brief in opposition to motion for return of earnest money (7600 Kingston, 7656 Kingston, 6949 Merrill).  Asset Disposition
	AW	2.00	Attention to memorandum regarding third party motion for earnest money deposits, draft template declaration in support of memorandum, proofread and cite-check memorandum, and email counsel regarding proposed revisions (7600 Kingston, 7656 Kingston, 6949 Merrill) (.9); multiple revisions to declaration and memorandum as per review and emails from J. Wine, K. Duff, and M. Rachlis (7600 Kingston, 7656 Kingston, 6949 Merrill) (.7); finalize memorandum, declaration, and exhibits, file documents with the court, and follow up with counsel regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill) (.4).  Asset Disposition
	JR	4.30	Review income and loss statements received from property management related to single family homes and update electronic files (.4); exchange correspondence with property management and request additional property reports for single family homes (.2); review email from property management regarding requested documents for closing and respond accordingly (4533 S. Calumet) (.1); review email and requested documents from property management and update electronic files (.2); review email from K. Duff requesting an addendum to contract for property (638 N. Avers), draft same and respond to K. Duff accordingly (.2); draft notices to tenant letters and update lien waiver to property manager in anticipation for closing (4317 S. Michigan) (.5); exchange correspondence with property management (M. Abraham at PSR) requesting execution of same (4317 S. Michigan) (.1); follow up correspondence with property management requesting missing leases and subsidy agreements for property (4533 S. Calumet) in preparation for closing (.1); review leases, subsidy agreements, security deposits and update certified rent roll in anticipation for closing (4317 S. Michigan) (1.1); exchange correspondence with the property management team requesting additional missing leases, subsidy agreements and property reports in preparation for closing (4317 S. Michigan) (.2); draft transfer declaration form for property (7656 S. Kingston) (.3); draft transfer declaration form for property (4533 S. Calumet) (.3); draft transfer declaration form for property (4317 S. Michigan) (.3); review email from property management regarding requested property reports in preparation for closing, update electronic files and update certified rent roll (4317 S. Michigan) (.3).  Asset Disposition
	AEP	0.70	Read through correspondence relating to filing of sur-reply in connection with lender motions to stay sales of receivership properties pending appeal (1131-41 79th, 6250 Mozart) (.1); review title commitment for receivership property (1422 E 68th) and prepare response to buyer's counsel regarding deletion of special exceptions and judicial obstacles to closing (.3); read

Date    Indiv   Hours   Description

---

correspondence from counsel for purchaser of receivership property (4533 S Calumet), revise and transmit preliminary seller figures, and provide notice of potentially substantial prepaid rent credits (.3); respond to M. Rachlis e-mail regarding various issues associated with draft motion to confirm sale of receivership property (7237-43 S Bennett).

Asset Disposition

11/23/2020 MR    5.30 Further review and work on response to intervenor's motion regarding escrow monies, and follow up on same and exchange of various emails regarding same with K. Duff, J. Wine and A. Watychowicz (7600 Kingston, 7656 Kingston, 6949 Merrill) (4.8); attention to motion to approve sale of (7237 Bennett) property (.5).

Asset Disposition

11/24/2020 AW    0.30 Serve memorandum regarding motion for earnest money as per service list (7600 Kingston, 7656 Kingston, 6949 Merrill) (.3); request pleadings upload to receivership web page.

Asset Disposition

JR    2.70 Review email from title company water department regarding status of application (4533 S. Calumet) (.1); further correspondence with the property manager regarding additional requests for processing of same (4533 S. Calumet) (.2); review requested leases and subsidy agreements from property management, update electronic files and update certified rent roll in preparation for closing (4317 S. Michigan) (.6) further correspondence with property manager requesting further clarification of same (4317 S. Michigan) (.1); review due diligence documents requested from property management for single family homes (.4); further correspondence with property management requesting same for single family homes (.1); review email from property management regarding requested due diligence documents for property in preparation for closing (4533 S. Calumet) and update electronic files (.2); finalize mailings for notice letter to tenants in anticipation of delivery to tenants post-closing (4317 S. Michigan, 4533 S. Calumet, 6949 S. Merrill, 7600 S. Kingston, 7656 S. Kingston) (1.0).

Asset Disposition

AEP    0.80 Read e-mail from counsel for prospective purchaser of receivership property (4533 S Calumet), prepare preliminary computations of prepaid rent and water credits based on review of utility bills and prepare response thereto (.4); review all attorney examiner worksheets received from title insurer in connection with conveyance of single-family home portfolio, update portfolio spreadsheet, and inventory missing worksheets (.4).

Asset Disposition

MR    0.50 Attention to intervenor issues (7600 Kingston, 7656 Kingston, 6949Merrill).

Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/25/2020	JR	3.20	Review single family home portfolio and due diligence documents and update rent roll related to updated utility statements, leases and security deposit information.  Asset Disposition
	AEP	0.40	Correspondence with title company regarding rescheduling of closings of receivership properties (7600 S Kingston, 7656 S Kingston, and 6949 S Merrill) (.1); review proposed renewed brokerage agreement relating to prospective sale of single-family home portfolio and prepare e-mail to broker requesting additional changes and explanation for certain deletions (.3).  Asset Disposition
11/26/2020	AEP	0.80	Legal research regarding finality of receivership sales (.5); read and respond to e-mail inquiry from counsel for purchaser of receivership property (4611 S Drexel) regarding status of administrative actions and judgments (.3).  Asset Disposition
11/28/2020	AEP	0.30	Review portfolio spreadsheet and prepare e-mail to K. Duff regarding remaining properties (7237 S Bennett) and issue relating to property.  Asset Disposition
11/29/2020	AEP	2.80	Begin preparation of purchase and sale agreement for single-family home portfolio (2.2); review all due diligence folders for properties in single-family home portfolio, remove unnecessary documents, and create final checklist of property-specific issues (.6).  Asset Disposition
11/30/2020	JRW	0.50	Review public notice and related communications with K. Duff and A. Porter (1102 Bingham) (.2); review contract for sale of property (1102 Bingham) and related exchange with K. Duff regarding consolidated motion (.1); review docketing statement and statement of issues on appeal and related review of appellate docket (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2).  Asset Disposition
	JR	7.40	Review email from A. Porter regarding single family home due diligence documents and respond accordingly (.1); review email from property management regarding requested updated due diligence documents and water meter information (4533 S. Calumet), update electronic files and update rent roll in anticipation for closing (1.5); exchange correspondence

Date	Indiv	Hours	Description
------	-------	-------	-------------

with the title company providing water meter information for same (4355 S. Calumet) (.2); finalize notice to tenant letters for closing (4533 S. Calumet) (.4); review email from A. Porter regarding closings (7600 Kingston, 7656 S. Kingston) and request information for same (.2); follow up correspondence with property management regarding document request for closing (4317 S. Michigan) (.1); exchange correspondence with the title company providing all documents in preparation for closing (4533 S. Calumet) (.2); review email from J. Wine regarding draft motion of court approval of property expenses and provide requested information for property (5618 S. MLK) (.2); review email from K. Pritchard and provide requested closed property report (.1); review due diligence documents for single family home (.6); telephone call with A. Porter and K. Duff regarding property closings (6949 S. Merrill, 7600 Kingston, 7656 S. Kingston) (.5); prepare and finalize all documents for closings (4533 S. Calumet, 6949 S. Merrill) (2.9); exchange correspondence with K. Duff requesting execution of closing documents related to properties (6949 S. Merrill, 7600 Kingston, 7656 S. Kingston) (.1); exchange correspondence with property manager requesting property reports in preparation for closing (6949 S. Merrill) (.2); exchange correspondence with property management requesting property reports in anticipation of closing (7600 Kingston, 7656 S. Kingston, 4317 S. Michigan) (.1).

Asset Disposition

11/30/2020	MR	0.50	Attention to property sales and management.
------------	----	------	---

Asset Disposition

	AEP	0.60	Teleconference with property manager regarding property management issue (.3); teleconference with J. Rak regarding final closing and document execution issues associated with scheduled conveyances of receivership properties (6949 S Merrill, 7600 S Kingston, 7656 S Kingston) (.3).
--	-----	------	---

Asset Disposition

SUBTOTAL:

230.20      56410.00]

Business Operations

11/2/2020	KMP	0.20	Follow up on status of receipt of insurance settlement funds for property claim (638 Avers) and communicate with K. Duff regarding same.
-----------	-----	------	--

Business Operations

	ED	1.70	Email correspondence with accountants regarding property manager reporting receivership financial records, and details relating to property restoration and reimbursement completed through September 2020 (.7);
--	----	------	--

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			review and analysis of related documents (1.0).  Business Operations
11/2/2020	JRW	0.40	Review medical records regarding personal injury claim (7110 S Cornell) and related summary to K. Duff and A. Porter.  Business Operations
	AW	0.90	Review list of former EquityBuild online vendors provided by K. Duff, research regarding notices of receivership to same and preserved data, and detailed response to K. Duff.  Business Operations
11/3/2020	KMP	1.70	Communicate with EB team and insurance brokers regarding payment notice (.2); prepare payment for security services company in connection with fire at property (638 Avers) and communicate with K. Duff and J. Rak regarding same (.3); begin collecting and downloading documents from property managers (1.2).  Business Operations
	AW	0.60	Communicate with A. Porter regarding recorded mortgage documents (8043 S Hermitage) (.1); attention to notice from insurance company, research regarding same, and communicate with K. Duff and J. Wine regarding same (.2); communicate with counsel regarding corporate issues (.3).  Business Operations
11/4/2020	KMP	1.70	Continue collecting and downloading documents from property manager's electronic data file (.9); review information and documents on property manager's portal and communicate with K. Duff regarding same (.8).  Business Operations
	ED	0.50	Review financial reporting documents from property managers relating to properties (.3) and email correspondence with K. Duff regarding same (.2).  Business Operations
	JRW	0.30	Attention to administrative orders (6250 S Mozart, 7109 S Calumet, 7750 S Muskegon) (.2); email exchange regarding LLCs (.1).  Business Operations

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/4/2020	AW	1.10	Prepare list of pending motions and timeline of sales motions and exchange correspondence with K. Duff regarding same.  Business Operations
11/5/2020	KMP	0.90	Prepare spreadsheet tracking receipts and expenses for property account (638 N Avers) and communicate with K. Duff regarding same.  Business Operations
	ED	0.60	Email correspondence with accountant regarding information needed for preparation of property reports (.3); review reporting from property managers to identify relevant documentation (.3)  Business Operations
11/6/2020	KMP	2.60	Work on spreadsheet detailing property tax payments made by Receiver from inception of receivership and communicate with K. Duff and J. Rak regarding same.  Business Operations
	ED	1.40	Continue review of property manager reporting for preparation of reports (.3) and email correspondence with accountants and property manager regarding same (.4); review and analysis of financial reporting relating to properties (.4), and email correspondence with K. Duff regarding comments and proposed revisions (.2); email correspondence with lender's counsel regarding access to property (7109 S Calumet) for inspection by appraiser (.1).  Business Operations
	JRW	0.20	Exchange settlement correspondence with city counsel regarding administrative proceedings (431 E 42nd Pl) and related communication with K. Duff and A. Porter.  Business Operations
11/9/2020	KMP	3.00	Effectuate blast email service for reply in support of tenth motion to approve property sales (.6); work on analysis of payments to property managers for property expenses (2.4).  Business Operations
	JRW	0.60	Conference call with K. Duff and M. Rachlis regarding potential claim (7110 S Cornell).  Business Operations



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/9/2020	MR	0.60	Attention to personal injury matter (7110 Cornell) and conferences regarding same with J. Wine and K. Duff.  Business Operations
11/10/2020	KMP	3.20	Further work on analysis of payments to property managers for property expenses.  Business Operations
	ED	0.10	Email correspondence with accountants and property manager regarding information still needed for preparation of June reporting.  Business Operations
	JRW	1.40	Prepare motion to set aside default (4611 S. Drexel), finalize and file (.6); research and email exchange with A. Porter regarding notice of violation (1449 N. Talman) (.4); exchange correspondence with city counsel regarding settlement of administrative proceeding (431 E 42nd PI) (.1); exchange correspondence with plaintiff's counsel regarding claim (7114 S Cornell) (.2); review administrative court orders (5001 S Drexel) and confer with A. Watychowicz regarding docketing (.1).  Business Operations
	AEP	0.20	Read e-mail from J. Wine regarding latest administrative action filed against receivership entities, research title to non-receivership property (1449 N Talman) and prepare response to J. Wine regarding suggestion for obtaining dismissal of receivership defendants (.2).  Business Operations
11/11/2020	KMP	0.70	Prepare form for transfer of funds for payment of insurance premium funding and communicate with K. Duff and bank representative regarding same (.4); communicate with loss management service provider regarding status of insurance settlement checks for property damage (638 Avers) (.3).  Business Operations
11/12/2020	KMP	0.20	Follow up on transfer of funds for payment of insurance premium funding and communicate with K. Duff and bank representative regarding same.  Business Operations
	ED	0.50	Review and respond to K. Duff inquiry regarding real estate taxes (.1) and review analysis of related financial documentation (.2); email correspondence with J. Rak and with accountants to identify and share financial reporting information necessary for completion of remaining June accounting reports (.2).  Business Operations

Date    Indiv Hours Description

---

11/13/2020	KMP	2.40	Analysis of property manager's October reporting and year-to-date accounts payable (1.2); annotate AP spreadsheet for specific properties (638 Avers (.3), 1401 109th (.4)) in connection with same; compile supporting documentation relating to same (.5).
			Business Operations
	ED	1.20	Email correspondence with accountants and J. Rak regarding revisions to drafts of June reports, and steps to begin preparation of July reports (.3); email correspondence with lender's counsel and property manager regarding arrangements for access to property (6217 S Dorchester) for purposes of lender appraisal (.2); email correspondence with K. Duff regarding inquiry from lender's counsel (.3) and review and analysis of related records (.4).
			Business Operations
	JRW	0.20	Attention to settlement negotiations (431 E 42nd PI).
			Business Operations
	AW	0.70	Review and update motion chart and communicate with J. Wine regarding same.
			Business Operations
11/17/2020	KMP	1.10	Work on analysis of funds expended for property expenses, in connection with anticipated motion for restoration.
			Business Operations
	JRW	0.20	Exchange correspondence with A. Porter and K. Duff regarding water bill for sold property (5618 S MLK) and motion for approval of same (.1); confer with K. Duff regarding corporate issue (.1).
			Business Operations
	AW	0.40	Attention to notices from administrative court regarding properties (416 E 66th, 7109 S Calumet, 2527 E 76th, 7600 S Kingston, 2514 S 77th, 7656 S Kingston).
			Business Operations
11/18/2020	AW	0.10	Attention to multiple notices regarding violations (431 E 42nd PI) and update docket.
			Business Operations

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/19/2020	KMP	0.20	Communication with insurance broker to inquire regarding premium refund check.  Business Operations
	ED	0.50	Email correspondence with accountant, K. Pritchard, and J. Rak regarding additional reporting information required for preparation of July property reports.  Business Operations
	JRW	0.60	Review administrative orders (7656 S Kingston, 7600 S Kingston, 7109 S Calumet, 6558 S Vernon) and confer with A. Watychowicz regarding docketing of same (.2); correspondence to A. Porter and K. Duff regarding settlement of claims and administrative orders (431 E 42nd Pl., 4611 S Drexel) (.4).  Business Operations
11/20/2020	KMP	0.20	Communication with insurance adjuster to inquire regarding status of settlement check from insurer (638 N Avers).  Business Operations
	ED	0.30	Email correspondence with lender's counsel regarding requested property access for appraisals (7255 E Euclid, 4611 S Drexel) (.1); review of property reporting from property managers regarding sold properties (6558 S Vernon, 4618 S MLK) in order to respond to inquiry from lender's counsel (.2).  Business Operations
	JRW	0.30	Exchange correspondence regarding tenant issue (4520 S Drexel) (.1); settlement of state court action (.1); correspondence to City attorney regarding judgment order (431 E 42nd Pl) (.1).  Business Operations
	MR	0.20	Attention to requests on various issues on properties (4520 Drexel, 6558 Vernon and 7749 Yates).  Business Operations
11/23/2020	ED	0.20	Email correspondence with property manager and lender's counsel regarding arrangements for property access for lender's appraiser (7255 S Euclid, 4611 S Drexel).  Business Operations

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/23/2020	MR	0.20	Attention to email regarding property (5618 King Drive).  Business Operations
11/24/2020	KMP	0.30	Communicate with K. Duff regarding accounting for insurance settlement payments for property damage (638 N Avers) and expenses claimed by property manager for same property (638 N Avers).  Business Operations
	ED	0.60	Email correspondence with property manager and lender's counsel regarding arrangements for property access for lender's appraiser (7255 S Euclid, 4611 S Drexel) (.3); email correspondence with accountant and J. Rak regarding review and revision of July accounting reports and preparation of draft August reports (.3).  Business Operations
	JRW	0.60	Correspondence to City of Chicago ownership dispute division regarding notice of code violation (1449 N Talman) and injunction against proceedings.  Business Operations
11/25/2020	KMP	0.40	Prepare request form for transfer of funds to financing company for insurance premium installment payment, and communicate with bank representatives and K. Duff regarding same.  Business Operations
	JRW	1.70	Review nonsuit order (1449 N. Talman) and related email exchange (.1); drafting of motion to use funds from property accounts for payment of property-related expenses (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd Place, 4520 S Drexel, 5618 S MLK) (1.6).  Business Operations
11/27/2020	AEP	0.20	Review orders entered in third-party litigation and prepare e-mail to K. Duff regarding need to continue stay order.  Business Operations
11/30/2020	KMP	2.30	Prepare spreadsheet identifying account balances for certain sold properties (7749 Yates, 8201 Kingston, 8047 Manistee, 7051 Bennett, 431 E 42nd Place, 4520 Drexel) and communicate with J. Wine and J. Rak regarding same (1.2); work on spreadsheet identifying property expenses (1.1).  Business Operations

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

11/30/2020	JRW	1.90	Review administrative court notices (7456 Saginaw, 431 E 42nd Pl, 1449 N. Talman) and related email to A. Watychowicz and A. Porter (.1); exchange correspondence with K. Duff and K. Pritchard regarding corporate issue (.2); related correspondence to and telephone conference with accountant (.3); draft motion for approval to pay expenses from property accounts (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd Place, 4520 S Drexel, 5618 S MLK) and related communications with J. Rak and K. Pritchard regarding sales proceeds and payments (1.2); related telephone conference with escrow agent (5618 S MLK) (.1).
------------	-----	------	---

Business Operations

SUBTOTAL:

[42.30

9180.00]

Case Administration

11/2/2020	AW	0.20	Attention to SEC filing and communicate with counsel regarding same (.1); attention to third party appeal filings and communicate with counsel regarding same (.1).
-----------	----	------	---

Case Administration

11/4/2020	AW	0.30	Communicate with J. Wine regarding scheduled conferences and process before same (.1); research and email exchange with counsel regarding notification issue (.2).
-----------	----	------	--

Case Administration

11/5/2020	AW	0.50	Email counsel regarding December 17, 2020 hearing (.1); communicate with J. Wine regarding upcoming deadlines in matter and create comprehensive spreadsheet containing all future deadlines (.4).
-----------	----	------	--

Case Administration

11/9/2020	AW	0.80	Communicate with K. Duff regarding updates to receivership web page (.1); attention to notices and orders submitted in District Court and Appellate Court, notify counsel regarding same, and update docket (.6); correspond with K. Pritchard regarding mailinglist and logistics of serving pleadings on claimants (.1).
-----------	----	------	--

Case Administration

11/10/2020	AW	0.40	Start preparation of pleadings for receivership update (.2); attention to administrative court order and notice of hearing and email J. Wine regarding same (.2).
------------	----	------	---

Case Administration

11/11/2020	AW	1.10	Complete preparation of pleadings for Receivership webpage update and contact IT consultant with request for update.
------------	----	------	--

Case Administration

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/13/2020	KMP	0.30	Attention to deposit of insurance settlement checks (638 Avers).  Case Administration
	AW	0.20	Communicate with counsel regarding double filing by mortgagees and issues with potential future reference (1131 E 79th, 6250 Mozart) (.1) and order regarding December 17, 2020 hearing and logistics for same (.1).  Case Administration
11/17/2020	JRW	0.30	Review and comment on docketing reports and upcoming deadlines.  Case Administration
	AW	0.40	Create deadline calendar.  Case Administration
11/18/2020	AW	0.80	Review updated receivership web page and request additional revisions from IT consultant (.1); review docket and request additional upload of pleadings to EquityBuild webpage (.5); revisions and updates to EquityBuild docket (.2).  Case Administration
SUBTOTAL:			[ 5.30                      778.00]

Claims Administration & Objections

11/2/2020	JRW	3.70	Review various claimant inquiries and draft standard update regarding status of claims process (1.3); review claims against property (6217 S Dorchester) and related analysis (.3); correspondence to K. Duff and M. Rachlis regarding plan for distributing claims forms and supporting documentation (.2); attend virtual meeting with database vendor regarding proposal (1.0); related review of proposal and scheduling of training session (.3); exchange correspondence with M. Rachlis regarding standard response to claimant inquiries (.2); research claims and revise response to claimant inquiries (.4).  Claims Administration & Objections
	AW	4.60	Attention to numerous emails from claimants, review same, communicate with J. Wine and K. Duff regarding proposed responses and solutions, respond to number of claimants (3.4); revisions to master claims list (.3); request database updates based on claimants' emails (.2); review status

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			reports and communicate with K. Duff regarding master claims list and formats of same (.5); exchange communications with counsel regarding discovery requests to investors (.2).
			Claims Administration & Objections
11/2/2020	MR	9.00	Work on response to motion to stay (1131 E 79th, 6250 Mozart) (7.9); attend meeting with vendor regarding proposal (1.0); attention to other communications on claims library and issues regarding distribution of claims information (.1).
			Claims Administration & Objections
11/3/2020	JRW	1.70	Attention to claimant inquiries (.1); review and revise draft communication to claimants providing update regarding status of claims process and related correspondence with K. Duff and M. Rachlis (1.1); study correspondence from proposed document vendor (.2); related analysis to K. Duff and M. Rachlis (.2) and correspondence from claimant's counsel (.1).
			Claims Administration & Objections
	AW	3.90	Draft email responses to claimant and work with J. Wine and K. Duff on revisions to same (.1); work on review, update to claims, responses to claimants and communicate with claims vendor regarding necessary updates to database (3.1); attention to mortgagees' docketing statement filed at appellate court, research regarding deadlines, and communicate with counsel regarding same (1131 E 79th, 6250 Mozart) (.3); email exchange with K. Duff regarding information provided to claimants (.1); revise update for claimants and email exchange with counsel regarding same and response to proposed revisions (.3).
			Claims Administration & Objections
	MR	8.50	Further work on response to motion to stay and related motion for certification (1131 E 79th, 6250 Mozart) (8.0); attention to issues regarding intervenor and review emails regarding same (.3); attention to correspondence regarding email update on status and issues regarding proposed document vendor (.2).
			Claims Administration & Objections
11/4/2020	AW	0.50	Attention to appeal documents filed by third party and communicate regarding same with counsel (7600 Kingston, 7656 Kingston, 6949 Merrill) (.1); review claims and communicate with K. Duff and J. Wine regarding claimant's request for updates (.1); email exchange with claims vendor regarding updates to database (.1); follow up with K. Duff and J. Wine regarding claimants' email (.2).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/4/2020	MR	6.60	Research and work on issues regarding motion for certification of issues for appeal (1131 E 79th, 6250 Mozart) (3.0); work on further review and edits to response to motion to stay brief (1131 E 79th, 6250 Mozart) (3.0); confer with J. Wine regarding communications with court and preparations for hearing (.3); further preparation for upcoming hearing on motion to stay (1131 E 79th, 6250 Mozart) (.3).  Claims Administration & Objections
11/5/2020	JRW	1.50	Attend training session with e-discovery vendor (1.0) and related telephone and email correspondence with M. Rachlis and A. Watychowicz (.5).  Claims Administration & Objections
	AW	0.50	Communicate with J. Wine and K. Duff regarding revisions to update email to claimants (.1); draft lengthy email to claimant who requested contact information for claimants' counsel who filed appearance in matter (.4).  Claims Administration & Objections
	MR	2.80	Further prepare for and participate in hearing on motion to stay (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.9); attention to issues regarding upcoming filings and rules regarding same (.6); attend meeting on EB claims library (1.0) and follow up regarding same with J. Wine and A. Watychowicz (.3).  Claims Administration & Objections
11/6/2020	JRW	1.70	Attention to claimants' counsel's request for proofs of claims, study related information, and exchange correspondence regarding same (.5); telephone conference with A. Porter and K. Duff regarding claims and liens against property (6217 S Dorchester) (.8); study analysis of priority dispute (6217 S Dorchester) and exhibits (.4).  Claims Administration & Objections
	MR	2.40	Work on response brief and affidavit in support of reply on tenth sales motion.  Claims Administration & Objections
11/8/2020	MR	2.00	Attention to motion to dismiss in appellate court and rules and issues regarding same (1131 E 79th, 6250 Mozart).  Claims Administration & Objections
11/9/2020	JRW	3.00	Attention to responding to claimant inquiries (.9); related exchange with M. Rachlis (.2); correspondence to K. Duff and M. Rachlis regarding claims process (.4); research regarding appellate procedure and related email to team (1131 E 79th, 6250 Mozart) (.6); conference call with A. Porter, K. Duff and M. Rachlis regarding claims process and discovery of EquityBuild documents (.5); review court order regarding claims process motion and related telephone conference with claimants' counsel (.2) and exchange



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			with K. Duff and M. Rachlis (.2). Claims Administration & Objections
11/9/2020	AW	3.80	Communicate with K. Duff and J. Wine regarding various emails from claimants (.4); attention to emails from claimants, review claims, and respond to numerous emails from claimants (3.4). Claims Administration & Objections
	MR	6.00	Further work on motion to dismiss and research regarding same (1131 E 79th, 6250 Mozart) (4.9); attention to communications regarding claims process (.4); conference calls regarding claims process with K. Duff, A. Porter, and J. Wine (.5); attention to order on stay motions (.2). Claims Administration & Objections
11/10/2020	JRW	1.70	Work on modified claims process for discussion with claimants' counsel (.8); correspondence with A. Watychowicz regarding claim against properties (6217 S Dorchester and 1414 E 62nd Place) (.2); attention to claimant inquiries (.7). Claims Administration & Objections
	AW	1.10	Continue review of claims and responding to claimants' requests for updates (.6); communicate with K. Duff and J. Wine regarding proposed responses to claimants (.4); request upload of documents for claimant explaining claimed amounts (.1). Claims Administration & Objections
	JR	0.30	Review email from K. Duff related to lender counsel inquiry regarding 3rd quarter status report and property proceeds (8326-52 S. Ellis) and provide requested information and documents regarding same. Claims Administration & Objections
	MR	6.80	Continue work on motion to dismiss (1131 E 79th, 6250 Mozart). Claims Administration & Objections
11/11/2020	JRW	2.10	Review proposal from (.1) and telephone conference with database vendor regarding process for distribution of claims documentation (.3); attention to updating proposed claims process based on intervening court rulings (1.1); revise standard discovery requests per court's oral rulings (.5); email exchange with A. Porter regarding claims against property (6217 S Dorchester) (.1). Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/11/2020	AW	0.40	Communicate with J. Wine regarding revised response to claimant, claimant's comments, and claimant's estate issues (.2); respond to emails from claimant (.2).  Claims Administration & Objections
	MR	0.20	Attention to issues regarding claims and issues on property (6217 Dorchester).  Claims Administration & Objections
11/12/2020	JRW	1.00	Email exchange with M. Rachlis and K. Duff regarding claimants' request for claims documentation (.2); search proofs of claim for claimant and secondary contact name (.1); work with A. Watychowicz on identifying number of claimants and related review of prior analyses (.7).  Claims Administration & Objections
	AW	2.50	Research and communicate with M. Rachlis regarding draft docketing statement for Receiver and response to statement of the issues (1131 E 79th, 6250 Mozart) (.2); work with K. Duff, M. Rachlis, and J. Wine on motion to dismiss appeal (1131 E 79th, 6250 Mozart) (1.3); communicate with counsel regarding reactions from claimant to opposition to motion to stay (.1); create list of unique claimants (.9).  Claims Administration & Objections
	MR	2.60	Attention to reply on motion to stay and follow up on other issues regarding motion to dismiss and communications regarding same with K. Duff (1131 E 79th, 6250 Mozart) (2.0); attention to recent Seventh Circuit filings on statement of issues and draft docketing statement and follow up regarding same with A. Watychowicz (1131 E 79th, 6250 Mozart) (.4); attention to email exchange with K. Duff and J. Wine regarding claims documents (.2).  Claims Administration & Objections
11/13/2020	JRW	2.90	Review and revise draft motion to dismiss appeal (1131 E 79th, 6250 Mozart).  Claims Administration & Objections
	AW	1.40	Research regarding and communicate with counsel regarding appellate procedures, draft disclosure, and timing (1131 E 79th, 6250 Mozart) (.6); fact check motion to dismiss appeal and communicate with counsel regarding record cites (1131 E 79th, 6250 Mozart) (.8).  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/13/2020	MR	0.70	Telephone conference with SEC (.5); attention to issues regarding production of claims materials (.2).  Claims Administration & Objections
11/16/2020	KMP	3.90	Work with EB team on motion to dismiss appeal, disclosure and appearance, and docketing statement, including numerous revisions to same, compiling exhibits, completing tables of authorities and contents, and preparing motion and related materials for filing (1131-41 79th, 6250 Mozart) (3.6); file motion, docketing statement, and appearance with Seventh Circuit (1131-41 79th, 6250 Mozart) (.3).  Claims Administration & Objections
	MR	0.70	Conference with SEC and K. Duff (.5); conference with K. Duff on appeal (.2).  Claims Administration & Objections
11/17/2020	JRW	0.20	Email exchange with A. Porter and related research regarding claim (.1); confer with M. Rachlis regarding response to claimants' motion for protective order (.1).  Claims Administration & Objections
	AW	0.70	Review transcript information sheet submitted by appellants, update transcript sheet, and communicate same to counsel (1131-41 79th, 6250 Mozart).  Claims Administration & Objections
11/18/2020	JRW	4.60	Review K. Duff outline regarding claims process and related communications with K. Duff and M. Rachlis (.3); review proposal from potential e-discovery vendor (.2) and related telephone conference with claimants' counsel (.5); correspondence to vendor regarding proposal for EquityBuild documents (.2); revise standard discovery requests to investors in accordance with court's oral rulings (.4) and correspondence to claimants' counsel regarding same (.1); legal research for response to claimants' motion for protective order (2.3); study claims against properties (6217 S Dorchester and 1408 E 62nd) (.6).  Claims Administration & Objections
	AW	0.40	Respond to claimant's email regarding claims (.1); follow up with K. Duff and J. Wine regarding responses to claimants (.1); attention to order regarding response to motion to dismiss appeal, forward to counsel, and docket deadline (1131 E 79th, 6250 Mozart) (.1); communicate with M. Rachlis regarding upcoming mediation and email mediator participants' contact information (.1).  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/18/2020	MR	7.20	Conferences with SEC (.5); conference with K, Duff (.4); attention to order (.1); further work on motion to dismiss intervenor's appeal (5.3); communications and preparation for upcoming mediation (.5); review of brief filed by intervenor and follow up regarding same (.4).  Claims Administration & Objections
11/19/2020	JRW	0.40	Exchange correspondence with K. Duff regarding claimant inquiry (.2); review motion for protective order and confer with M. Rachlis regarding same (.2).  Claims Administration & Objections
	AW	0.20	Communicate with J. Wine regarding change of custodian for one of claimants and revise master claims list accordingly (.1); communicate with appellate court regarding scheduled mediation (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.1).  Claims Administration & Objections
	MR	2.00	Prepare for mediation and review materials regarding same (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (1.7); conference with J. Wine regarding response to motion for protective order and related items and review of same (.3).  Claims Administration & Objections
11/20/2020	AW	0.80	Respond to emails from claimants regarding claims process (.2); review and revise master claims list as per claimants' emails and request same updates and uploads from claims vendor (.6).  Claims Administration & Objections
	MR	1.40	Participate in appellate court mediation with lender claimants (1131 E 79th, 6250 Mozart) (.6); preparation for mediation (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.6); attention to claims process issues (.2).  Claims Administration & Objections
11/21/2020	JRW	1.90	Correspondence with potential vendor regarding claims process (.1); legal research and drafting of response to claimants' motion for protective order (1.8).  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/22/2020	JRW	3.90	Drafting of opposition to motion for protective order.  Claims Administration & Objections
11/23/2020	JRW	6.30	Legal research and drafting of response to motion for protective order (5.9); draft response to claimant inquiry and related communications with A. Watychowicz and K. Duff (.2); exchange correspondence with claimant's counsel regarding claims process (.2).  Claims Administration & Objections
	AW	0.30	Follow up with K. Duff and J. Wine regarding repeated emails from claimant and respond to same (.1); research regarding decisions in support of objection to institutional lenders' motion for protective order and email J. Wine regarding same (.2).  Claims Administration & Objections
	MR	1.60	Attention to opposition to motion for protective order (1.3); attention to emails regarding claims process issues (.2); attention to correspondence from claimant (.1).  Claims Administration & Objections
11/24/2020	JRW	4.10	Additional legal research for response to motion for protective order (1.8); review redlines, further revise, and finalize same for filing (1.7); exchange correspondence with A. Watychowicz and K. Duff regarding response to claimant inquiry (.2); review correspondence from e-discovery vendor regarding procedure for entering confidentiality agreement (.1); exchange correspondence with counsel for claimants' regarding claims documentation and related exchange with K. Duff and M. Rachlis (.2); review transcript of October 27 proceedings (.1).  Claims Administration & Objections
	AW	2.80	Communicate with K. Duff and J. Wine regarding email from non-claimant and respond to same (.2); attention to opposition to motion for protective order, proofread same, and email counsel regarding revisions (1.4); multiple revisions of same, finalize opposition, file with court, and serve as per service list (1.2).  Claims Administration & Objections
	MR	3.10	Work on brief in opposition to motion for protective order, review and revise same, and review decisions regarding same (2.8); attention to status on claims issues (.3).  Claims Administration & Objections
11/25/2020	JRW	4.10	Work with M. Rachlis and K. Duff on updated claims process (3.5); review court order and transcript regarding court's oral and written interim rulings regarding claims process, draft correspondence to claimants' counsel

Date	Indiv	Hours	Description
			regarding claims process, and related discussion with K. Duff (.6). Claims Administration & Objections
11/25/2020	MR	4.00	Attention to draft summary of claims process and issues (.5) and participate in meeting regarding claims process with K. Duff and J. Wine (3.5). Claims Administration & Objections
11/30/2020	JRW	1.90	Study master spreadsheet regarding rollover claims and related analysis to K. Duff (.3); review claims forms for examples of rollover documentation (1.3); review SEC response to motion to dismiss appeal (1131 E 79th, 6250 Mozart) (.1); review appellants' response to motion to dismiss (1131 E 79th, 6250 Mozart) (.2). Claims Administration & Objections
	MR	1.30	Attention to emails regarding claims process (.5); attention to appellate brief (1131 E 79th, 6250 Mozart) (.8). Claims Administration & Objections

SUBTOTAL: 143.70      42947.00]

Tax Issues

11/17/2020	AW	0.30	Organize 1099-S forms for multiple properties and forward to K. Pritchard with instructions from K. Duff. Tax Issues
11/19/2020	KMP	0.30	Forward various forms 1099-S to accountants relating to sale of properties (5618 MLK, 6355 S Talman, 8209 S Ellis, 2736 W 64th, 7051 S Bennett, 7201 S Constance, 7957 Marquette, 6356 California, 3074 Cheltenham, 6554 Vernon). Tax Issues
11/30/2020	KMP	0.20	Communicate with J. Wine regarding status of state agency tax notices for certain entities. Tax Issues

SUBTOTAL: [ 0.80      112.00]

436.00      \$111,345.00

Other ChargesDescriptionAsset Disposition

Publication of notice for 11th motion to approve sales	600.00
--	--------

SUBTOTAL:	[ 600.00]
-----------	-----------

Business Operations

Software licenses (Google - \$96.00; InSynq - \$266.50)	362.50
---	--------

Photocopies for November 2020	346.70
-------------------------------	--------

Online research for November 2020	1,454.16
-----------------------------------	----------

SUBTOTAL:	[ 2,163.36]
-----------	-------------

Total Other Charges	\$2,763.36
---------------------	------------

Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Jodi Wine	76.50	260.00	\$19,890.00
Ania Watychowicz	54.20	140.00	\$7,588.00
Justyna Rak	110.00	140.00	\$15,400.00
Kathleen M. Pritchard	30.80	140.00	\$4,312.00
Andrew E. Porter	56.80	390.00	\$22,152.00
Ellen Duff	7.60	390.00	\$2,964.00
Michael Rachlis	100.10	390.00	\$39,039.00

**SUMMARY**

Legal Services	\$111,345.00
Other Charges	\$2,763.36
<b>TOTAL DUE</b>	<b>\$114,108.36</b>



# Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
SUITE 900  
CHICAGO, ILLINOIS 60605

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

February 15, 2021

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.6622129

Legal Fees for the period December 2020	\$105,905.50
Expenses Disbursed	\$679.92
<b>Due this Invoice</b>	<b>\$106,585.42</b>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
<u>Accounting/Auditing</u>					
12/2/2020	KMP	3.50	Balance ledgers for Receiver's to online bank records (.3); work on schedules of receipts and disbursements for October and November 2020 (1.6); work on analysis of paid property expenses for April-November 2020, including identifying supporting documentation (1.6).		
			Accounting/Auditing		
12/3/2020	KMP	2.50	Reconcile online bank records to identify recent transactions (.7); update ledger for certain Receiver's accounts to conform to online bank records (.3); review bank statements for numerous Receiver's accounts (1.5).		
			Accounting/Auditing		
12/9/2020	KMP	0.20	Record recent transactions to account ledgers for Receiver's accounts.		
			Accounting/Auditing		
12/23/2020	KMP	0.20	Communicate with K. Duff and bank representative regarding reports for property account balances.		
			Accounting/Auditing		
12/24/2020	KMP	0.20	Communicate with bank representative regarding reports for property account balances.		
			Accounting/Auditing		
SUBTOTAL:				[ 6.60	924.00]

Asset Analysis & Recovery

12/3/2020	JR	4.70	Review email from accounting firm and further correspond with E. Duff regarding reporting for August (.1); produce all reports received from accounting firm and complete review (4.6).		
			Asset Analysis & Recovery		
12/4/2020	JR	1.10	Finalize August report review.		
			Asset Analysis & Recovery		
12/8/2020	AEP	0.20	Teleconference with K. Duff regarding remaining potential claimsto be filed in receivership action.		
			Asset Analysis & Recovery		

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/30/2020	MR	0.80	Attention to potential asset.  Asset Analysis & Recovery
12/31/2020	AW	0.30	Attention to asset statements submitted by defendants, along with email exchanges and notes and email K. Duff and M. Rachlis regarding same.  Asset Analysis & Recovery
	MR	0.20	Further Attention to information relating to potential asset.  Asset Analysis & Recovery

SUBTOTAL: [ 7.30                      1322.00]

Asset Disposition

12/1/2020	JR	7.00	Exchange correspondence with property management regarding final reports needed for closings (6949 S. Merrill and 4533 S. Calumet) (.3); attend closing of property (6949 S. Merrill) (2.5); attend closing (4355 S. Calumet) (2.9); review email from property manager, update electronic files and request additional reports for closings (4317 S. Michigan 7600 S. Kingston and 7656 S. Kingston) (.2); final preparation of documents for closings (4317 S. Michigan 7600 S. Kingston and 7656 S. Kingston) (.7); exchange correspondence with buyer producing all leases and subsidy contracts related to sale of property (4533 S. Calumet) (.2); exchange correspondence with buyer's counsel producing all leases and subsidy contracts related to sale of property (6949 S. Merrill) (.2).  Asset Disposition
	AEP	3.70	Reconcile final draft of putative certified rent rolls associated with closing of receivership property (6949 S Merrill), discuss open issues with J. Rak, and prepare final proposed prepaid rent credit and rent prorations (.5); review water bills associated with receivership property (6949 S Merrill), reconcile with ledger card, and prepare utility proration (.2); communications with M. Rachlis and K. Duff regarding status of closings and implications of receipt of judicial order staying same (.1); communication with prospective purchaser of receivership properties (7600 S Kingston, 7656 S Kingston) regarding inquiry into potential existence of judicial order prolonging stay of closings (.1); teleconference with former EquityBuild title insurer regarding status of hold harmless indemnity associated with prospective sale of receivership property (7656 S Kingston) (.1); reconcile final drafts of certified rent roll associated with receivership property (4533 S Calumet), compute final proposed prepaid rent credit and rent prorations, and transmit same to counsel for purchaser with explanation (.3); prepare proration agreement governing post-closing collection of rents at receivership property (4533 S Calumet) (.3); read final communications between counsel for purchaser of receivership property (6949 S Merrill) and escrow agent to ensure proper execution of all documentation (.1); correspondence with counsel for purchaser of receivership property (4533 S Calumet) regarding demand for additional rent credits (.2); review final settlement statement for closing of receivership property (4533 S Calumet) (.1); review all documentation in files

Date	Indiv	Hours	Description
			<p>pertaining to receivership property (1102 Bingham), reorganize same, and prepare closing checklist (.8); update closing figures for sales of receivership properties (7600 S Kingston, 7656 S Kingston) and submit to escrow agent (.5); prepare and submit closing figures for sale of receivership property (4515 S Michigan) (.4).</p> <p>Asset Disposition</p>
12/1/2020	MR	0.20	<p>Attention to closing issues (7600 Kingston, 7656 Kingston and 6949 Merrill) and communications regarding same.</p> <p>Asset Disposition</p>
12/2/2020	KMP	0.40	<p>Review online bank records to confirm receipt of proceeds from sales of property (6949 S Merrill, 4533 S Calumet) and communicate with K. Duff and J. Rak regarding same (.2); confirm wire instructions for sale of property (4317 S Michigan) with K. Duff and J. Rak (.2).</p> <p>Asset Disposition</p>
	JR	8.50	<p>Follow up email to property management requesting property reports for closings (4317 S. Michigan, 7600 S. Kingston and 7656 S. Kingston) (.1); telephone call with A. Porter regarding closing (4317 S. Michigan) (.3); attend closing (4317 S. Michigan) (3.3); exchange correspondence with broker requesting confirmation of wire instructions (4317 S. Michigan) (.1); review property reports and update rent rolls related to prorations and provide credits to buyer related to sales (7600 S. Kingston and 7656 S. Kingston) (.5); attend closing (7600 S. Kingston) (1.9); attend closing (7656 S. Kingston) (2.1); exchange correspondence with K. Duff, K. Pritchard and broker advising of closings (4317 S. Michigan, 7600 S. Kingston and 7656 S. Kingston) (.2)</p> <p>Asset Disposition</p>
	AEP	2.30	<p>Review draft settlement statements for receivership properties (7600 S Kingston and 7656 S Kingston) and transmit corrections to escrow agent (.1); communications with escrow agent regarding involuntary dissolution of entity and effect of federal receivership order (.1); review water ledgers for receivership properties (7600 S Kingston and 7656 South Kingston) and communicate discrepancies to escrow agent (.2); communications with escrow agent, J. Rak, and former title company regarding release of escrowed funds associated with closing of sale of receivership property (4315 S Michigan) (.2); prepare waived title in connection with sale of receivership property (4315 S Michigan) (.2); prepare affidavits for execution by K. Duff in connection with buyer request for certain endorsements for receivership properties (7600 S Kingston and 7656 S Kingston) (.3); review final proposed certified rent roll and rent prorations associated with sale of receivership property (4515 S Michigan) (.1); review final water balance information pertaining to sale of receivership property (4315 S Michigan), update closing figures, and authorize inclusion of same on settlement statement (.1); final review of settlement statement associated with sale of receivership property (4315 S Michigan) (.1); review final rent rolls in connection with closings of receivership properties (7600 S Kingston and 7656 S Kingston) (.3); read purchase and sale contract for receivership property (1102 Bingham) to complete creation of closing checklist and research status of local property tax liens in connection with continued preparation of motion to confirm sale (.6).</p> <p>Asset Disposition</p>

Date	Indiv	Hours	Description
12/2/2020	MR	0.50	Attention to issues on property sales (7600 Kingston, 7656 Kingston, 6949 Merrill).  Asset Disposition
12/3/2020	KMP	0.60	Review online bank records to confirm receipt of proceeds from sales of property (4315 Michigan, 7600 Kingston, 7656 Kingston) and communicate with K. Duff and J. Rak regarding same (.2); finalize notice of sales (7600 Kingston, 7656 Kingston, 6949 Merrill) and file same with court, and confer with A. Watychowicz regarding same (.4).  Asset Disposition
	JRW	0.60	Exchange correspondence with A. Porter and K. Duff regarding eleventh motion to confirm sales (.2); place publication notice (.2); review and comment on notice of property sales involved in claimants' motion to stay and review updated draft (7600 Kingston, 7656 Kingston, 6949 Merrill) (.2).  Asset Disposition
	JR	0.50	Exchange correspondence with K. Pritchard regarding closed property related to property insurance (.1); exchange correspondence with the property management team regarding closed properties (4317 S. Michigan, 7600 S. Kingston and 7656 S. Kingston) (.1); update electronic files with all property reports received from property manager from closings (4317 S. Michigan, 7600 S. Kingston and 7656 S. Kingston) (.3).  Asset Disposition
	AW	0.70	Work with K. Duff, M. Rachlis, and J. Wine on notice of sale and opposition to third party motion to stay (7600 Kingston, 7656 Kingston, 6949 Merrill) (.4); attention to time stamped notice and supplement and serve as per service list (.3).  Asset Disposition
	MR	0.40	Further review and follow up on intervenor's filing regarding properties (7600 Kingston, 7656 Kingston, 6949 Merrill) (.3); review request regarding (1700 Juneway) property (.1).  Asset Disposition
12/4/2020	JR	5.10	Review previously delivered delinquency report and exchange correspondence with property management requesting current delinquency report for single family home portfolio (.3); review email from A. Watychowicz regarding request for sale amount of properties (6949 S. Merrill, 7600 S. Kingston and 7656 S. Kingston) and provide requested documents (.2); review previously requested rent rolls, leases, subsidy contracts and delinquency reports for single family homes, update master rent roll and request additional missing items from property management (1414 East 62nd Place, 1418 East 62nd Place, 1017 W 102nd Street, 1516 E

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			85th Place, 2136 W 83rd Street, 417 Oglesby Avenue, 7922 S Luella Avenue, 7925 S Kingston Avenue, 7933 S Kingston Avenue, 8030 S Marquette Avenue, 8104 S Kingston Avenue, 8403 S Aberdeen Street, 8405 S Marquette Avenue, 8529 S Rhodes Avenue, 8800 S Ada Street, 9212 S Parnell Avenue, 10012 S LaSalle Avenue, 11318 S Church Street, 3213 S Throop Street, 3723 W 68th Place, 406 E 87th Place, 61 E 92nd Street, 6554 S Rhodes Avenue, 6825 S Indiana Avenue, 7210 S Vernon Avenue, 7712 S Euclid Avenue, 7953 S Woodlawn Avenue, 8107 S Kingston Avenue, 8346 S Constance Avenue, 8432 S Essex Avenue, 8517 S Vernon Avenue, 2129 W 71st Street, 9610 S Woodlawn Avenue, 5437 S Laffin Street, 6759 S Indiana Avenue, 1401 W 109th Place, 310 E 50th Street, 6807 S Indiana Avenue) (4.6).
			Asset Disposition
12/4/2020	AEP	2.60	Communications with J. Wine regarding procedural issues associated with timing of filing motions to confirm sales of additional receivership properties (7237 S Bennett, 1102 Bingham) (.1); work on response to motion to vacate sales of receivership properties (6949 S Merrill, 7600 S Kingston, 7656 S Kingston) (2.5).
			Asset Disposition
	AW	1.30	Legal research regarding motion to dismiss and response filed in appellate court (1131 E 79th, 6250 Mozart).
			Asset Disposition
	MR	0.20	Attention to intervenor's filing regarding stay of sales (7600 Kingston, 7656 Kingston, 6949 Merrill).
			Asset Disposition
12/6/2020	AEP	3.00	Draft memorandum in opposition to motion to vacate sales of receivership property (6949 S Merrill, 7600 S Kingston, 7656 S Kingston), continue legal research regarding various points of law, proofread, edit, and revise first draft, and transmit same to receiver.
			Asset Disposition
	MR	2.30	Work on reply to intervenor's stay motion (7600 Kingston, 7656 Kingston, 6949 Merrill).
			Asset Disposition
12/7/2020	JRW	0.90	Review and revise draft motion to vacate sales (7600 Kingston, 7656 Kingston, 6949 Merrill) (.8); review draft eleventh motion to confirm sales (7237 Bennett) (.1).
			Asset Disposition
	JR	6.00	Review email from property management and provide required closing documents from closings of properties (4317 S. Michigan, 7600 S. Kingston and 7656 S. Kingston) (.2); review master rent roll for single family homes and exchange correspondence with A. Porter regarding same (.3); review

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			leases for security deposit information related to single family homes (1.3); exchange correspondence with property management inquiring about a security deposit for tenant (8403 Aberdeen) (.1); review closing documents for various properties and organize electronic files (4317 S. Michigan, 7701 S. Essex, 7656 S. Kingston, 7600 S. Kingston, 6949 S. Merrill, 4533 S. Calumet) (2.1); conference call with A. Porter related to single family portfolio status (.7); exchange correspondence with property management requesting updates to due diligence documents for single family homes (.1); review updated utility bills for single family homes and update electronic files regarding same (1.2).
			Asset Disposition
12/7/2020	AW	1.70	Communicate with K. Duff regarding notice of sale filed with court (7600 Kingston, 7656 Kingston, 6494 Merrill) (.1); work with K. Duff, J. Wine, and M. Rachlis on revisions and finalization of opposition to motion to vacate, file with court (7600 Kingston, 7656 Kingston, 6494 Merrill) (1.6).
			Asset Disposition
	AEP	0.50	Proofread, edit, and revise drafts of proposed motion to vacate (7600 Kingston, 7656 Kingston, 6949 Merrill).
			Asset Disposition
	MR	1.80	Attention to emergency motion by intervenor and various exchanges regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill).
			Asset Disposition
12/8/2020	JRW	0.20	Email exchange regarding placement of publication notice for single family portfolio.
			Asset Disposition
	JR	6.20	Review utility statements received from property management for single family homes and update electronic files (1.6); exchange correspondence with property management regarding same (.1); review additional due diligence documents received from property management for single family homes and update electronic files (2.7); review and analyze ledgers for single family homes against rent roll and confirm rental income consistency in preparation for marketing and providing documents to potential buyers (1.7); review email from brokerage firm regarding requested due diligence documents for single family homes and respond accordingly (.1).
			Asset Disposition
	AW	0.30	Attention to time stamped opposition to third party motion to vacate sales and serve as per service list (7600 Kingston, 7656 Kingston, 6949 Merrill).
			Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/8/2020	AEP	1.50	Teleconference with property manager regarding property management issues (.2); teleconference with K.Duff regarding property management (.3); continue editing, revising, and customizing purchase and sale contract for single-family home portfolio and review all litigation files to ascertain current status of all administrative and housing court proceedings (1.0).  Asset Disposition
12/9/2020	JR	6.90	Review emails from property management and update master rent roll with requested property information for single family homes (.3); review updated income and profit statements, compare and analyze expenses with updated utility statements provided by property management for single family portfolio in preparation for production to potential buyer (6.3);exchange correspondence with A. Porter regarding same (.3).  Asset Disposition
	AEP	1.20	Teleconference with J. Rak regarding discrepancies between monthly utility bills and operating expenses and possible strategies for fixing issues prior to producing due diligence documents associated with sale of single-family homes (.3); review proof of notice of public sale in connection with advertisement of single-family home portfolio (.1); read tax sale notice received from Cook County Clerk and prepare e-mail to title underwriter confirming mootness (431 E 42nd Pl) (.2); review notice of violation on receivership property (6250 S Mozart) and forward same to prospective purchaser with explanation (.1); review settlement statements from numerous recent closings of receivership properties and update portfoliospreadsheet with relevant data (.3); read e-mail from J. Wine regarding claims submitted against properties in single-family home portfolio and update portfolio spreadsheet accordingly (.2).  Asset Disposition
	MR	0.50	Attention to intervenor's motion and issues for response and begin drafting same (7600 Kingston, 7656 Kingston, 6949 Merrill).  Asset Disposition
12/10/2020	KMP	0.20	Communicate with K. Duff, A. Porter, J. Wine and J. Rak regarding unpaid water bill balance subsequent to property closing (4553 S Calumet) and potential solutions.  Asset Disposition
	JRW	1.40	Review draft eleventh motion to confirm sales and work with M. Rachlis and K. Duff to revise (7237 Bennett) (.5); review and comment on draft opposition to appellant's motion to extend briefing schedule (7600 Kingston, 7656 Kingston, 6949 Merrill) (.3); review proof of claim and related correspondence with A. Porter (7237 Bennett) (.2); email exchanges with K. Duff and A. Porter regarding revisions to eleventh motion to confirm sales (7237 Bennett) (.4).  Asset Disposition



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/10/2020	JR	6.10	Finalize review of the income and profit statements and analyze information in electronic files in preparation for production to single family homes potential buyers (1.7); exchange correspondence with property management team requesting missing property utility statements for single family homes to resolve discrepancies (.3); exchange correspondence with brokerage firm and inquire about uploading requested single family homes information pertaining to same (.1); organize all due diligence documents including leases in preparation for production to brokerage firm related to single family homes (1.3); final review of single family homes master rent roll regarding same and make finalupdates to electronic files (1.6); exchange correspondence with A. Porter regarding same (single family homes) (.3); review email from the title company regarding water balance for previously sold property (4533 S. Calumet) and respond accordingly (.1); further communication with K. Pritchard, A. Porter and K. Duff regarding same (.2); additional communication with the City of Chicago water department requesting explanation to high water balance for property (4533 S. Calumet) (.5).  Asset Disposition
	AEP	1.90	Teleconference with property manager regarding management issue (.2); read and respond to e-mail inquiry from counsel for prospective purchaser of receivership property (4611 S Drexel) regarding current status of judicial proceedings and potential closing timetable (.1); teleconference with J. Rak regarding overage of water invoices following sale of receivership property (4533 S Calumet) and finalization of rent roll associated with single-family home portfolio (.2); proofread, edit, and revise final draft of eleventh motion to confirm sales (7237 Bennett) (.3); prepare summary of redemption of property taxes associated with receivership property for counsel to various investor-lender claimants (.1); prepare e-mail to K. Duff regarding issues associated with water bill for receivership property (4533 S Calumet) (.1); prepare response to broker of single-family homes regarding finalization of due diligence materials and status of rent roll (.1); review all tenant ledgers and other documents added to due diligence folder for single-family homes, reorganize certain file structures and review and approve final rent roll (.8).  Asset Disposition
	MR	4.00	Further work on reply to intervenor's motion (7600 Kingston, 7656 Kingston, 6949 Merrill) (3.0); attention to 11th motion to approve sales and work with K. Duff and J. Wine regarding same (1.0).  Asset Disposition
12/11/2020	KMP	0.30	Work on draft motion to approve property sales and communicate with J. Wine regarding same (7237 Bennett).  Asset Disposition
	JRW	1.20	Revisions to and correspondence with A. Porter regarding eleventh sales motion (7237 Bennett) (.7); telephone conference with A. Porter regarding eleventh sales motion (7237 Bennett) (.4); correspondence to court clerk regarding proposed order granting remainder of ninth sales motion (.1).  Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/11/2020	JR	4.40	Exchange correspondence with J. Wine regarding administrative matter related to property (4611 Drexel) and provide requested information (.2); follow up correspondence with City of Chicago water department inquiring about a water bill for property (4533 S. Calumet) (.1); review email related to the order dismissing appeal related to properties (1131 E. 79th and 6250 S. Mozart) (.1); exchange correspondence with A. Porter regarding same and discuss plan for closings of same (1131 E. 79th and 6250 S. Mozart) (.2); exchange correspondence with the title company requesting water applications for processing (1131 E. 79th and 6250 S. Mozart) (.1); review property reports in preparation for sale and request property reports from property manager in anticipation of closing (1131 E. 79th) (.2); review property reports in preparation for sale and request property reports from property manager in anticipation of closing (6250 S. Mozart) (.2); review, update and draft closing documents (1131 E. 79th) in anticipation of sale (2.8); begin updating and drafting closing documents for property in anticipation for sale (6250 S. Mozart) (.5).
			Asset Disposition
	AEP	0.50	Teleconference with J. Rak regarding remaining discrepancies in single-family home due diligence materials (.1); teleconference with J. Wine regarding nature of property manager claims and sale of receivership property (7237 S Bennett) free and clear of certain liens (.2).
			Asset Disposition
12/12/2020	JRW	1.00	Review exhibits and revise consolidated eleventh sales motion (7237 Bennett) (.6) and motion for approval to pay expenses (7749 Yates, 8201 Kingston, 8047-55 Manistee, 7051 Bennett, 431 E 42nd Pl, 4520 Drexel) (.4).
			Asset Disposition
	AEP	0.20	Read judicial orders relating to interlocutory appeals pursued by institutional lenders in connection with ninth motion to confirm sales and update closing checklists.
			Asset Disposition
12/14/2020	JRW	2.20	Revisions and finalization of 11th sales motion and related correspondence with A. Porter, K. Duff and M. Rachlis (7237 Bennett) (1.6); work with K. Pritchard on exhibits to same (7237 Bennett) (.3); review and revise draft proposed order (7237 Bennett) (.1); correspondence from outside counsel for city regarding release of lien (4611 S Drexel) (.1); exchange correspondence regarding proposed order for ninth sales motion (.1).
			Asset Disposition
	JR	5.50	Review due diligence documents for property and request current property reports from property management (6250 S. Mozart) (.5); review leases, lease terms, lessee name and security deposit information for property

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			(6250 S. Mozart) (1.6); request additional missing items regarding same from property management (6250 S. Mozart (.2); update certified rent roll regarding same (.8); update and draft closing documents in preparation for sale (6250 S. Mozart) (2.1); telephone call to A. Watychowicz regarding the submission of the Order related to the 9th motion to confirm sale (.3).
			Asset Disposition
12/14/2020	AEP	0.80	Proofread, edit, and revise drafts of eleventh motion to confirm sales (7237 Bennett) (.6); prepare e-mail to counsel for property manager regarding filing of eleventh motion to confirm sales (7237 Bennett) (.2).
			Asset Disposition
	MR	0.90	Attention to various versions on motion on (7237 Bennett) property for approval and other related items and communications regarding same (7237 Bennett) (.8); follow up communications regarding order on 9th motion to confirm (.1).
			Asset Disposition
12/15/2020	JR	5.40	Review emails from property management regarding requested property reports and update electronic files related to single family home portfolio (.4); review additional master rent roll and update sale related to single family homes (.5); review closing documents and exchange correspondence with A. Porter requesting final review of same (1131 E. 79th and 6250 S. Mozart) (.3); draft closing documents in preparation for closing, update closing checklist (7237 S. Bennett) (3.7); exchange correspondence with A. Porter regarding same (7237 S. Bennett) (.1); review email from K. Duff and draft an amendment to contract (638 Avers) (.2); review email from A. Porter and provide requested delinquency report for property (6250 S. Mozart) (.2).
			Asset Disposition
	AW	0.30	Communicate with K. Duff regarding service of eleventh motion to approve sale (7237 Bennett) (.1); attention to entered orders regarding ninth and eleventh sale motions, and a letter to Judge Lee from claimant forward to counsel, and update docket (.2).
			Asset Disposition
	AEP	1.10	Read e-mail from property manager regarding prospective tenancy at receivership property (7840 S Yates) and prepare e-mail to counsel for prospective buyer regarding same (.1); finalize first draft of purchase and sale agreement for single-family homes and transmit same to K. Duff and receivership broker for review and comment (.6); read e-mail from counsel for prospective purchaser of receivership property (6250 S Mozart) regarding delinquencies in commercial rents, investigate, and respond thereto (.3); review and approve real estate broker and property manager lien waivers in connection with prospective sales of receivership properties (6250 S Mozart, 1131 E 79th) (.1).
			Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/16/2020	SZ	0.40	Review accounting firm records for information related to EIN for corporate entity in connection with sale of property (6250 Mozart) and exchange correspondence regarding same.  Asset Disposition
	JR	4.10	Finalize lien waiver for closings and provide to broker for execution in anticipation of sale (1131 E. 79th and 6250 S. Mozart); review closing confirmation and update electronic files of same (1131 E. 79th and 6250 S. Mozart) (.1); update notices to tenants and property manager lien waivers and exchange correspondence with buyer requesting approval and signature of same in anticipation of closing (1131 E. 79th and 6250 S. Mozart) (.8); review judicial order approving sale of properties and update closing checklists and closing documents regarding same (1131 E. 79th and 6250 S. Mozart) (2.9); exchange correspondence with property management providing closing details and requesting property reports for closing (1131 E. 79th and 6250 S. Mozart) (.3).  Asset Disposition
	AW	0.60	Email exchanges with counsel regarding email to claimants notifying of eleventh motion to confirm sale (7237 Bennett) (.2); serve by email eleventh motion to approve sale on all claimants (7237 Bennett) (.4).  Asset Disposition
	AEP	0.50	Exchanges of e-mail with counsel for purchaser of receivership property (6250 S Mozart) regarding necessity of estoppel certificates, review lease files, review and revise proposed drafts supplied by buyer's counsel, and prepare e-mail to property manager regarding urgency of execution (.4); miscellaneous e-mails with K. Duff, J. Rak, and escrow agent regarding planning for closings of receivership properties (6250 S Mozart, 1131 East 79th) (.1).  Asset Disposition
12/17/2020	JR	5.60	Update electronic files related to closing documents for property in preparation for closing (1131 E. 79th) (.6); exchange correspondence with property management requesting execution of notices to tenants regarding upcoming closing (6250 S. Mozart) (.2); review property sale price information and generate report related to same, resolve a discrepancy (.9); draft closing documents for property (638 N. Avers, 1422 E. 68th, 2800 E. 81st, 4611 S. Drexel, 4750 S. Indiana, 6217 S. Dorchester, 7024 S. Paxton, 7109 S. Calumet, 7237 S. Bennett, 7255 S. Euclid, 7840 S. Yates) (3.9).  Asset Disposition
	AEP	8.30	Prepare title examiner's worksheets relating to single family residence portfolio for all properties owned by corporate entity.  Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/18/2020	JR	6.60	Exchange correspondence with broker regarding allocation values of the single family homes (.2); exchange correspondence with accounting firm about completion of various 1099 forms related to the single family homes for different entities (.3); followup correspondence with the City of Chicago water department requesting an update on the water bill for property (4533 S. Calumet) (.2); draft water applications for single family homes (4.1); draft closing documents for unsold properties (7024 S. Paxton, 7109 S. Calumet, 7237 S. Bennett, 7255 S. Euclid, 7840 S. Yates) (1.8).  Asset Disposition
	AEP	1.00	Teleconference with J. Rak regarding preparation for sales of single-family home portfolio and all issues associated with deed preparation, applications for transfer stamps, and value allocations on title commitments (1.0); prepare e-mail to wireless carrier regarding need for estoppel certificate in connection with closing of sale of receivership property (6250 S Mozart) (.1); prepare e-mail to retail tenant regarding need for estoppel certificate in connection with closing of sale of receivership property (6250 S Mozart) (.1); prepare amended estimate of closing costs for conveyance of receivership property (638 N Avers) (.2).  Asset Disposition
12/19/2020	AEP	5.20	Prepare preliminary seller's figures in connection with prospective conveyance of receivership property (6250 S Mozart) (.4); review and revise draft closing documents, and prepare additional closing documents, in connection with conveyance of receivership property (6250 S Mozart) (1.2); prepare title examiner's worksheets relating to single family residence portfolio for all properties owned by certain corporate entities (3.6).  Asset Disposition
12/20/2020	AEP	4.50	Prepare title examiner's worksheets relating to single family residence portfolio for all properties owned by corporate entity and for additional receivership property (1414-18 E 62nd Place).  Asset Disposition
	MR	0.80	Review information on property (638 Avers) and draft analysis and response to same (.6); review materials regarding same (638 Avers) (.2).  Asset Disposition
12/21/2020	KMP	0.20	Study communication from J. Rak confirming outstanding amount due for utility payment from recent closing on sale of property (4533 S Calumet) and confer with K. Duff regarding same.  Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/21/2020	JR	6.20	<p>Review emails from E. Duff and accounting firm and produce requested sold property report (.1); review email from the title company and provide requested information regarding closing documents related to all single family homes (.1); review water statements and exchange correspondence with J. Wine, K. Duff and K. Pritchard related to final water payment for previously sold property (4355 S. Calumet) (.2); follow up correspondence with the title company confirming the final water bill amount for payment (4355 S. Calumet) (.1); begin drafting closing checklist for single family homes in preparation for closing (.8); exchange correspondence with A. Porter related to an estoppel certificate regarding upcoming closing (6250 S. Mozart) (.1); exchange correspondence with the title company regarding additional fees and charges for payment of final water bill (4355 S. Calumet) (.3); prepare final closing documents in preparation for closing (1131 E. 79th and 6250 S. Mozart) (3.6); exchange correspondence with A. Porter regarding closings (1131 E. 79th and 6250 S. Mozart) (.5); exchange correspondence with the title company regarding closings (1131 E. 79th and 6250 S. Mozart) (.4); exchange correspondence with property management requesting property reports in anticipation for closing (1131 E. 79th) (.2).</p> <p>Asset Disposition</p>
	AEP	3.30	<p>Teleconference with title company regarding numerous issues associated with preparation of title commitment for single-family home portfolio (.3); teleconference with J. Rak regarding water delinquency on receivership property (4533 S Calumet) (.1); review and revise all draft closing documents in connection with prospective conveyance of receivership property (1131 E 79th) (.9); revise estimated closing costs associated with prospective credit bid conveyance of receivership property (638 N Avers) (.1); review tax proration figures associated with prospective conveyance of receivership property (6250 S Mozart) and send e-mail to escrow agent affirming correctness of receivership computations (.1); additional communications with counsel for prospective purchaser of receivership property (6250 S Mozart) and escrow agent regarding discrepancies in settlement figures (.3); search for and review and analyze corporate documentation and deeds of conveyance associated with properties (7933 S Kingston, 8104 S Kingston, and 8529 S Rhodes), and in connection with finalization of examiner's worksheet and chain of title (1.1); research loan documents and insurance provisions pertaining to casualty at receivership property (638 N Avers) (.2); review worksheets in connection with conveyance of receivership property (638 N Avers) (.2).</p> <p>Asset Disposition</p>
12/22/2020	KMP	0.20	<p>Communicate with property manager and K. Duff regarding final distribution on sold property (3074 Cheltenham).</p> <p>Asset Disposition</p>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/22/2020	JR	7.10	Work with K. Duff and A. Watychowicz on signing of closing documents (6250 S. Mozart and 1131 E. 79th) (1.0); exchange correspondence with property management requesting property documents required for closing (6250 S. Mozart) (.1); exchange correspondence with A. Porter requesting execution of documents needed for closing (6250 S. Mozart) (.2); exchange correspondence with the title company providing order granting sales (1131 E. 79th and 6250 Mozart) (.1); exchange correspondence with property management requesting updated property reports required for closing (6250 S. Mozart) (.2); attend closing (1131 E. 79th) (2.6); attend closing (6250 S. Mozart) (2.4); exchange correspondence with K. Pritchard and the title company regarding payment of final water bill regarding a previously sold property (4533 S. Calumet) (.2); exchange correspondence with property management and title company regarding payment (7656 S. Kingston) (.2); exchange correspondence with broker, K. Duff, K. Pritchard notifying of closed properties (6250 S. Mozart and 1131 E. 79th) (.1).  Asset Disposition
	AW	0.40	Work on finalization of closing documents (6250 S. Mozart and 1131-41 E. 79th) with K. Duff and J. Rak.  Asset Disposition
	AEP	0.90	Teleconference with J. Rak to inventory all closing documents pertaining to conveyance of receivership properties (6250 S Mozart, 1131 E 79th) (.3); teleconference with J. Rak regarding finalization of water and rent prorations in connection with conveyance of receivership property (1131 E 79th) (.2); final reviews of draft settlement statements associated with closings of receivership properties (6250 S Mozart, 1131 E 79th) (.4).  Asset Disposition
12/23/2020	KMP	0.70	Communicate with J. Rak to confirm receipt of proceeds for sold properties (1131 E. 79th, 6250 Mozart) (.2); communicate with property manager regarding final reconciliations for sold properties (3074 Cheltenham, 7508 Essex, 4520 Drexel, 7110 Cornell, 5450 Indiana, 6437 Kenwood, 7450 Luella) (.5).  Asset Disposition
	JR	0.80	Review email from K. Duff and provide requested sold property information for the 3rd quarter 2020 (.2); exchange correspondence with the title company and K. Pritchard regarding the updated waterbalance for property and payment of same (4533 S. Calumet) (.6).  Asset Disposition
12/29/2020	JRW	0.30	Email exchange with K. Duff regarding publication notice of sale (.1); review claimant's objections to 11th sales motion (7237 Bennett) (.2).  Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
SUBTOTAL:					
				1[63.10	37458.00]
<u>Business Operations</u>					
12/1/2020	ED	0.20	Preliminary review of draft accounting reports for August 2020 prepared by accountant.		
Business Operations					
12/2/2020	JRW	1.10	Drafting of motion to pay expenses from property accounts (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel) (.6); review documentation and related exchange with E. Duff regarding insurance settlement (4520 S Drexel) (.5).		
Business Operations					
12/3/2020	KMP	2.80	Review spreadsheet relating to property closings and communicate with insurance broker to advise of recent closings (.2); work on analysis of paid property expenses for April-November 2020, including identifying supporting documentation (2.6).		
Business Operations					
	JRW	1.20	Attention to drafting motion to approve payments from property accounts (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel) (.7); related email exchange with property manager regarding account payable balances (.2) and related telephone conferences with E. Duff (.1) and K. Duff (.2).		
Business Operations					
12/4/2020	ED	0.70	Email correspondence with property manager (.1) and lender's counsel (.1) regarding arrangements for property access (7109 S Calumet) for inspection; email correspondence with J. Wine regarding documentation received from lenders (.4); email correspondence with accountant and J. Rak regarding review of draft August accounting reports and preparation of draft September reports (.1).		
Business Operations					
	KMP	3.30	Work on analysis of paid property expenses for April-November 2020, including identifying and compiling supporting documentation.		
Business Operations					
12/7/2020	JRW	0.30	Exchange correspondence with A. Porter regarding administrative proceeding (8405 S Marquette) and related review of files for proof of payment (.2); email exchange with property manager regarding current account balances (7749 S Yates, 8201 S Kingston, 8047 S Manistee, 7051 S Bennett) (.1).		
Business Operations					



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/8/2020	ED	0.30	Review of email correspondence from commercial tenant (6250Mozart) requesting consent to revisions to permitted use (.1); review of existing lease provisions (.1); email correspondence with property manager regarding same (6250 Mozart) (.1).  Business Operations
	JRW	3.00	Study financial statements from property manager (7749 S Yates, 8201 S Kingston, 8047 S Manistee, 7051 S Bennett) and related email exchange regarding same and revision to motion to approve payments from property accounts (2.2); prepare for administrative hearing (4611 S Drexel) and related email exchange with property manager (.6); review standing orders in preparation for upcoming state court hearing (.2).  Business Operations
12/9/2020	KMP	0.70	Prepare request for funds transfer to financing company for payment of insurance premium financing and communications with K. Duff and bank representatives regarding same (.4); briefly review and forward notices regarding property violations (7750 Muskegon, 6250 S Mozart) and tax sale (431 E 42nd) to J. Wine (.3).  Business Operations
	ED	2.40	Further email correspondence with lender's counsel and property manager regarding arrangements for property inspection (7109 S Calumet) (.1); email correspondence with lender regarding request for inspection and follow up relating to sale of subject property (6949 S Merrill) (.2); review and analysis of draft April and May accounting reports received from accountant and related financial reporting from property managers (2.1).  Business Operations
	JRW	4.20	Revise motion for approval of payments out of property accounts and prepare exhibits to same (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel) (1.3); related correspondence with property manager regarding property expenses (.1); review dockets in state court action and related exchange of correspondence with court clerk regarding upcoming hearing (.4); exchange correspondence with property manager regarding evidence for upcoming hearing (4611 Drexel) (.1); exchange correspondence with counsel for parties to state court action regarding upcoming hearing and proposed order continuing stay (.3); study pleadings in two state court matters, prepare notes regarding same, and related exchange of correspondence with A. Porter (7616 S Phillips) (1.5); telephone conference with K. Duff and A. Porter regarding state court actions (.3) and upcoming hearing on motion to set aside default judgment (4611 A Drexel) (.1); email exchange with K. Duff regarding property tax sale (431 E 42nd) (.1).  Business Operations

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/9/2020	AW	0.20	Research regarding complaint and communicate results to J. Wine.  Business Operations
12/10/2020	ED	3.90	Email correspondence with accountant regarding additional documentation necessary for preparation of September property accounting reports (.1); continue review of June property accounting reports (1.2); begin review of July accounting reports, and analysis of related financial reporting from property managers (2.6).  Business Operations
	JRW	1.30	Confer with E. Duff regarding exhibits to motion to approve expenditures (4520 S Drexel) (.2); exchange correspondence with counsel and clerk of court in state court action (.2); appear in state court hearing before Judge Mitchell (7616 S. Phillips) (.5); email exchange with property manager regarding evidence of compliance regarding cited violations (4611 S Drexel) (.1); exchange correspondence with K. Duff and A. Porter regarding payment due to title company (4533 S. Calumet) (.2); review M. Rachlis revisions to draft motion for approval to pay expenses from property accounts (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel) (.1).  Business Operations
	MR	0.50	Status on hearing regarding third party litigation (.1); attention to motion to pay expenses and follow up regarding same (.4).  Business Operations
12/11/2020	KMP	0.30	Work on draft motion to allow payment of expenses and communicate with J. Wine regarding same (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel).  Business Operations
	JRW	1.70	Appearance in court for administrative hearing and related negotiations with counsel for city (4611 S Drexel) (1.3); correspondence with K. Duff and A. Porter regarding status of administrative matter (4611 S Drexel) (.2); review and docket administrative order (4520 S Drexel) (.1); review order in state court matter (.1).  Business Operations
12/14/2020	KMP	4.70	Further work on consolidated motion to confirm sales and allow payment of expenses, including finalizing motion and exhibits and filing same electronically (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel) (4.4); communicate with K. Duff, M. Rachlis, A. Porter, and J. Wine regarding same (7749 S Yates, 8201 S Kingston, 8047-55 S Manistee, 7051 S Bennett, 431 E 42nd, 4520 S. Drexel) (.3).  Business Operations

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/14/2020	AW	0.20	Attention to order entered in other lawsuit and docket new case management call (.1); communicate with J. Wine regarding noticeregarding property (4520-26 S Drexel) (.1).  Business Operations
12/15/2020	KMP	0.20	Follow up with insurance adjuster regarding status of remaining payment on insurance settlement for property damage (638 Avers).  Business Operations
	AW	0.30	Communicate with K. Duff regarding issue with online platform and attempt to reinstate it (.2); email vendor regarding same (.1).  Business Operations
12/16/2020	ED	2.70	Email correspondence with accountant regarding reflection of restoration transfers in accounting reports (.7), and review of related reporting and financial records (.5); review of accounting reports and related property manager financial reports (1.5).  Business Operations
12/17/2020	KMP	0.60	Communications with asset manager requesting information (638 N Avers) (.2); confer with K. Duff regarding funds requested by property manager for security installations (.2); communications with K. Duff regarding receipt of insurance claim settlement (638 N Avers) and current balance of property account (.2).  Business Operations
	ED	1.30	Email correspondence with K. Duff regarding calculation of restoration amounts from property to be sold (638 Avers), and review of relevant financial reports (.4); call with accountant regarding calculation and reporting of restoration amounts from and to properties (.9).  Business Operations
	JRW	1.00	Exchange correspondence with counsel for City regarding release of lien, appearance, order granting motion to set aside default and continuance to ownership dispute division (4611 S Drexel) (.4); related email exchange with A. Porter regarding status of administrative proceedings (4611 S Drexel) (.1); exchange correspondence with A. Watychowicz regarding administrative hearing (4520 S Drexel) (.1); correspondence with property manager regarding filed motion (.1); correspond with J. Rak regarding payment of water bill (4533 S Calumet) (.1); review order in administrative proceeding (7110 S Cornell) and update files regarding same (.2).  Business Operations

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/18/2020	KMP	0.40	Prepare email correspondence to property manager requesting information regarding funds transfers for security installations (7760 Coles, 7237 Bennett) (.2); communicate with K. Duff regarding outstanding expenses for property (638 Avers) (.2).  Business Operations
	ED	0.60	Review revised draft reports from accountant, and analysis of applicable calculations and changes (.4) and draft email explaining comments and corrections (.2).  Business Operations
	JRW	0.20	Email exchange with counsel for City regarding administrative court proceedings (4611 S Drexel) and related update to A. Porter.  Business Operations
12/21/2020	KMP	0.40	Follow up with K. Duff regarding property manager's response relating to funds transfers for security installations (7760 Coles, 7237 Bennett) (.2); communicate with K. Duff regarding property manager's request for funding of property expenses (1401 W 109th) (.2).  Business Operations
	AW	0.40	Communicate with counsel regarding follow up email from company interested in lease (.1); attention to email from online vendor and email K. Duff and J. Wine regarding same and provide background (.2); attention to notices from administrative court (4611 S Drexel, 7110 S Cornell) and update docket (.1).  Business Operations
12/22/2020	KMP	0.80	Prepare request forms for funds transfers relating to property manager's request for funding of property expenses (638 N Avers, 1401 W 109th) and communicate with K. Duff and property manager regarding same (.4); prepare request form for funds transfer to financing company for installment on insurance premium financing and communicate with K. Duff regarding same (.2); prepare request form for funds transfer to title company for final payment on utilities for sold property (4533 S Calumet) and communicate with K. Duff and J. Rak regarding same (.2).  Business Operations
	JRW	0.90	Review tax notice (1516 E 85th Pl), related correspondence with K. Duff, A. Watychowicz, and accountant and revisions to notice letter (.6); review and revise notice letter (638-642 N. Avers) and related correspondence with K. Duff (.3).  Business Operations

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/22/2020	AW	0.20	Attention to original release of judgment (4611 S Drexel) and provide information regarding same to J. Wine and J. Rak (.1); attention to administrative order (6949 S Merrill) and communicate with J. Wine regarding same (.1).  Business Operations
12/23/2020	KMP	0.90	Revise request forms for funds transfers relating to property manager's request for funding of property expenses (638 N Avers, 1401 W 109th) and communicate with K. Duff and bank representatives regarding same (.3); revise request form for funds transfer to financing company for installment on insurance premium financing and communicate with K. Duff and bank representatives regarding same (.2); revise request form for funds transfer to title company for final payment on utilities for sold property (4533 S Calumet) and communicate with K. Duff, J. Rak, and bank representatives regarding same (.2); communicate with insurance broker to provide updated list of sold properties (.2).  Business Operations
12/28/2020	JRW	0.30	Review continuance order and order of default (6250 S Mozart) and related review of files and exchange with A. Porter and A. Watychowicz.  Business Operations
	ED	0.40	Email correspondence with accountant and insurance agent regarding updates to schedule of insurable values based on property sales, refunds and adjustments to premium finance agreements, and updates to schedule of properties.  Business Operations
	AW	0.30	Attention to orders entered in administrative court (6250 S Mozart and 2832 E 63rd) and communicate with J. Wine regarding same (.2); attention to order entered in administrative court (6250 S Mozart and 2832 E 63rd) and update docket (.1).  Business Operations
12/29/2020	JRW	0.20	Review notice of code violation (2129 W 71st St) and related correspondence with A. Porter (.1); correspondence with A. Porter regarding water bill (5618 SMLK) (.1).  Business Operations
	ED	0.20	Email correspondence with insurance agent and accountant regarding adjustment of premium finance agreement payments to reflect sold properties, and timing of refunds relating to same.  Business Operations
	AW	0.70	Attention to notices from administrative court and title company (5618 S MLK and 2129 W 71st St) and email counsel regarding same (.1); follow up with J. Wine regarding access to online database (.1); work with IT

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
			consultants to resolve issue regarding access to executed contracts stored online (.3); work on updates to email notifications groups (.2).		
			Business Operations		
SUBTOTAL:				[ 46.00	11588.00]
<u>Case Administration</u>					
12/7/2020	AW	0.90	Attention to entered order regarding additional appearance and share same with counsel (.1); review docket, compile pleadings for website update, and request update to website (.7); attention to entered order regarding hearing and communicate with counsel regarding same (.1).		
			Case Administration		
12/9/2020	AEP	0.40	Read e-mails forwarded by A. Watychowicz and J. Wine relating to non-receivership property (6801 S East End) and prepare response thereto (.2); teleconference with K. Duff and J. Wine regarding status of lawsuits filed by owners of non-receivership properties (6801 S East End and 7616-24 S Phillips) (.2).		
			Case Administration		
12/14/2020	AW	0.20	Attention to orders regarding appeal, dismissal orders from Judge Lee, and filed appearances, forward to counsel, and update docket.		
			Case Administration		
12/17/2020	AW	0.20	Attention to returned mail filed with the court and communicate with counsel regarding same (.1); attention to entered order setting new hearing date and email counsel regarding same (.1).		
			Case Administration		
12/31/2020	AW	1.10	Prepare pleadings for update to web page and request update.		
			Case Administration		
SUBTOTAL:				[ 2.80	492.00]

Claims Administration & Objections

12/1/2020	JRW	4.40	Review claims forms and supporting documentation (2.3); related correspondence with K. Duff regarding analysis of same (.3); correspond with K. Duff and revise draft response to claimant inquiry (.2); attention to evaluation of claims process (1.0); related email to and telephone conference with potential vendor regarding process, cost and timing of transfer of claims documentation (.5); related email exchange with database vendor (.1).		
			Claims Administration & Objections		

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/1/2020	AW	0.60	Email J. Wine regarding rollover authorization form from claimant (.1); finalize response to claimant regarding other claimant's email to multiple individuals (.2); attention to email regarding rollovers and review same columns in master claims sheet (.3).  Claims Administration & Objections
	MR	0.20	Attention to claims related issues regarding claims records and rollovers.  Claims Administration & Objections
12/2/2020	JRW	3.20	Work on joint report regarding claims status (2.0); work with A. Watychowicz on claims by tranche sheet (1.2).  Claims Administration & Objections
	AW	2.90	Research appellate rules regarding docketing statement, response to same, and motion practice and email M. Rachlis regarding same (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.4); attention to claims planning outline, prepare tranche oriented spreadsheet, and share with K. Duff and J. Wine (2.3); communicate with K. Duff and J. Wine regarding notice from claimant (.1); attention to voicemail from claimant and communicate with K. Duff regarding same (.1).  Claims Administration & Objections
	MR	0.50	Attention to reply to motion to dismiss in appellate court and follow up on same and rules on timing with A. Watychowicz (1131 E 79th, 6250 Mozart) (.3); attention to exchange on open issues on claims process (.2).  Claims Administration & Objections
12/3/2020	JRW	6.10	Continue working on updated claims process and related exchange of correspondence with K. Duff (1.8); conference call with document database vendors regarding plan for distribution of claims documentation to claimants (.4); continued modification of proposed tranches (2.3) and related telephone conference with K. Duff (.4); attention to responding to claimant inquiries (6160 S MLK Ave) (.6); email exchange with claimant's counsel regarding motion for leave to file additional appearances (.2); email correspondence with counsel for claimants (.1); review appellate court order and related email exchange (.1).  Claims Administration & Objections
	AW	0.40	Research regarding property sales and response to claimant inquiry regarding same (.2); attention to claimants' motion for extension of time to file and forward to counsel (.1); attention to email from counsel who represents multiple claimants (.1).  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/3/2020	AEP	2.90	Legal research regarding claims.  Claims Administration & Objections
	MR	4.20	Attention to appeal issues and reply filing (1131 E 79th, 6250 Mozart) (3.0); attention to issues on claims (.3); conference with claimants' counsel regarding claims process (.9).  Claims Administration & Objections
12/4/2020	JRW	4.30	Complete draft of updated claims process (.9) and related review of prior claims status reports to the court (.7); exchange correspondence with vendor regarding estimate (.1); work with A. Watychowicz on responding to claimant inquiry (.3); exchange correspondence with E.Duff regarding loan issue (.2);correspond with K. Duff, M. Rachlis, and SEC (1.8);draft emails to claimants' counsel regarding claims process (.3).  Claims Administration & Objections
	AW	2.50	Update claimant regarding current status of claim (.1); research regarding sale of properties (6356 S California and 1700-08 Juneway) and draft emails to claimant regarding same (.5); research regarding claim and draft response to claimant (.2);research regarding properties (7600 S Kingston, 7656 S. Kingston, 6949 S Merrill) and draft response to claimant (.2); review and confirm completeness of claims and communicate with J. Wine regarding same (.2); review claims process outline and share proposed revisions and comments with J. Wine (1.2); attention to response to comments regarding same (.1).  Claims Administration & Objections
	MR	2.00	Review and comment on claims memo and exchange various emails regarding same with J. Wine and K. Duff (1.0); attention to draft appellate reply brief (1131 E 79th, 6250 Mozart) (1.0).  Claims Administration & Objections
12/5/2020	MR	6.70	Further work on appellate reply brief (1131 E 79th, 6250 Mozart).  Claims Administration & Objections
12/6/2020	MR	6.00	Further work on appellate reply brief (1131 E 79th, 6250 Mozart).  Claims Administration & Objections
12/7/2020	JRW	4.30	Attention to responding to claimant inquiries (.3); review and revise draft reply to motion to dismiss appeal and related review of multiple redlines (1131 E 79th, 6250 Mozart) (2.4); legal research for same (1131 E 79th, 6250 Mozart) (1.5); email exchange with claimants' counsel regarding claims process outline (.1).  Claims Administration & Objections



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/7/2020	AW	4.30	Attention to email from claimant, communicate with K. Duff regarding response, and respond to claimant (.2); follow up with K. Duff regarding lengthy response to claimant's request regarding sold property (7750 S Muskegon) (.1); email exchange with J. Wine regarding fund question (.1); proofread reply in support of motion to dismiss and multiple email exchanges with K. Duff, M. Rachlis, and J. Wine regarding same, prepare table of contents and table of authorities, work on revisions and finalization of same, and file with appellate court (1131E 79th, 6250 Mozart) (3.9).  Claims Administration & Objections
	MR	5.00	Further work on reply on appeal and exchange regarding same(1131 E 79th, 6250 Mozart).  Claims Administration & Objections
12/8/2020	KMP	0.50	Draft notice letter to creditor and confer with K. Duff and J. Wine regarding same.  Claims Administration & Objections
	JRW	1.40	Exchange correspondence regarding court's order concerning claimants' participation in upcoming hearing (.1); exchange correspondence with document vendor regarding fees for distribution of claims documentation (.1); study claims against property (7927-49 S Essex) and analysis to A. Porter and K. Duff (.4); work with K. Duff and A. Watychowicz on response to claimant inquiry (.1); exchange correspondence with K. Duff and K. Pritchard regarding potential claim issues (.4); review and revise notice letter (.3).  Claims Administration & Objections
12/9/2020	KMP	0.40	Prepare correspondence regarding notice of receivership to creditor and confer with K. Duff and J. Wine regarding same.  Claims Administration & Objections
	JRW	3.20	Attention to claimant inquiries (.3); related review of claim submission and state court proceedings (6801 S East End) and prepare notes regarding same (1.7); review motion for extension and related email exchange with K. Duff regarding same (7600 Kingston, 7656 Kingston, 6949 Merrill) (.1); confer with K. Pritchard regarding notice letters (.1); review and comment on correspondence from claimants' counsel regarding claims process and update to court (.2); telephone conference with K. Duff and A. Porter regarding claims process (.2); study investor claims against single family residence properties and related analysis to K. Duff and A. Porter (.6).  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/9/2020	AW	0.30	Email response to claimant regarding inquiry about his claims (.1); communicate with K. Duff and J. Wine regarding claimant's participation in scheduled conference (.1); email exchange regarding claimants' inquiries about property manager lawsuit (.1).  Claims Administration & Objections
	AEP	0.40	Teleconference with K. Duff and J. Wine regarding claims process, potential scenarios, and research and analysis.  Claims Administration & Objections
12/10/2020	JRW	2.90	Study transcript of proceedings and revise standard discovery requests accordingly (2.2); confer with A. Watychowicz regarding schedule prepared by claimant's counsel (.1); review appearances on file and prepare list of counsel of record (.2); correspond with claimants' counsel regarding separation of properties into tranches (.1); review proof of claim (.3).  Claims Administration & Objections
	AW	2.20	Review claims process outline and sample tranche schedule and communicate with J. Wine regarding proposed revisions and comments (1.6); email exchange with K. Duff regarding response to claimant (.1); attention to master claims list and email exchange with J. Wine regarding same (.3); create a list of claimants represented by counsel and communicate same to counsel (.2).  Claims Administration & Objections
	MR	0.50	Attention to issues on claims process and follow up regarding same.  Claims Administration & Objections
12/11/2020	JRW	5.80	Review appellate court orders granting motions to dismiss and district court orders regarding stay (1131 E 79th, 6250 Mozart, 7600 Kingston, 7656 Kingston, 6949 Merrill) (.4); conference call with K. Duff and M. Rachlis regarding claims process and separation of properties into tranches (1.6); correspondence to court clerk forwarding appellate court orders (.1); compare vendor estimates for claims documentation and related correspondence (.3); draft email to claimant regarding upcoming hearing (.1); revise spreadsheet regarding proposed tranches (3.2); prepare correspondence to SEC (.1).  Claims Administration & Objections
	MR	3.50	Review tranches and claims information for upcoming hearing and meeting (1.0); conferences regarding various issues with K. Duff and J. Wine regarding claims process (2.0); attention to court opinions and follow up regarding same (.4) attention to communication with claimant regarding upcoming hearing (.1).  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/14/2020	JRW	5.10	Attention to responding to claimant inquiries (.5); exchange correspondence with document vendor regarding revised estimate (.2); exchange correspondence with K. Duff and M. Rachlis regarding proposed separation of properties into tranches (.2); review redline and comments from claimant's counsel regarding claims process outline and respond to same (.8); conference call with K. Duff and M. Rachlis regarding claims process (1.8); additional revision of claims process outline (1.4); related correspondence with counsel for claimants (.2).  Claims Administration & Objections
	AW	1.30	Attention to emails regarding responses to claimants with suggested revisions and respond to claimants (.2); call with J. Wine regarding current master claims list by property, generate same and email J. Wine updated list (.5); research and email exchange with M. Rachlis regarding turnover motion, reconsideration motion, and other pending motions before Judge Lee (.6).  Claims Administration & Objections
	MR	3.80	Review of claims process related issues and communications, and exchanges regarding same with various team members and preparation for upcoming hearing (2.0); participate in conference call with K. Duff and J. Wine (1.8).  Claims Administration & Objections
12/15/2020	JRW	6.50	Telephone conference with claimants' counsel regarding joint status report to court and related email exchange with K. Duff and M. Rachlis (.2); confer with team regarding notice to claimants (.2); draft joint status report on claims (1.2); review revisions to standard discovery and related email to claimant's counsel (.1); work with K. Duff and M. Rachlis on revisions to joint status report and outline of procedures (1.1); correspondence with claimant's counsel regarding same (.1); telephone conference with claimant's counsel regarding standard discovery requests (.1); review redline of standard discovery requests and further revise same (.8); study proposed revisions to joint status report from claimants' counsel and related conference with K. Duff and M. Rachlis (.8); additional exchanges of drafts and revision of joint status report, outline of procedures, and standard discovery requests (1.6); exchange correspondence with claimants' counsel and SEC regarding same (.3).  Claims Administration & Objections
	AW	1.80	Follow up with K. Duff regarding proposed response to claimants and email claimant (.1); attention to email from claimant requesting update to claim, review claim, and communicate with K. Duff and J. Wine regarding same (.2); review standard discovery requests and revise it as per counsel's forwarded draft (.9); call with J. Wine regarding pending motions (.1);

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			supplement section of joint claims status report regarding pending motions and email J. Wine regarding same (.5).
			Claims Administration & Objections
12/15/2020	MR	4.10	Reviews and work on claims related issues and review various drafts regarding same as well as related matters regarding upcoming hearing (3.3); participate in meeting with K. Duff and J. Wine regarding claims (.8).
			Claims Administration & Objections
12/16/2020	JRW	6.40	Exchange correspondence with claimants' counsel regarding joint claims status report (.1); confer with K. Duff and A. Watychowicz regarding claimant inquiries (.2); study transcripts of proceedings regarding claims process (1.1); conference call with claimants' counsel regarding claims process and joint status report (.7); revisions to status report and outline of procedures for distribution of claims documentation and EquityBuild documents (1.8); telephone conferences with institutional lender claimants' counsel (.6) and investor lender claimants' counsel (.3) regarding standard discovery requests and related email exchanges and revision of revised requests (.9); exchange correspondence with claimant in follow up to voice message (.1); correspondence to K. Duff and M. Rachlis regarding EquityBuild documents (.2); confer with claimants' counsel regarding quote from vendor and review same (.2); work with A. Watychowicz on filing (.2).
			Claims Administration & Objections
	AW	1.50	Communicate with K. Duff and J. Wine regarding email to claimant (.1); finalize email to claimant regarding proposed conference call time and email claimant regarding same (.1); attention to email from claimant and communicate with K. Duff and J. Wine regarding same (.1); add signature blocks to joint status report, revise joint status report, finalize and file with the court. (1.1); forward time stamped joint status report to Judge Lee's courtroom deputy (.1).
			Claims Administration & Objections
	MR	3.00	Further preparation for hearing (2.0); review and follow up on various issues regarding status report and upcoming hearing and submission (1.0).
			Claims Administration & Objections
12/17/2020	JRW	2.30	Attention to responding to claimant inquiries (.4); exchange correspondence with claimant's counsel regarding discovery (.1); conference call with K. Duff, M. Rachlis, and SEC (.5); attend court hearing on claims process and outstanding motions (.9); revise agreed confidentiality order and related correspondence to courtroom deputy (.2); exchange correspondence with K. Duff regarding supplementation of claims documentation (.2).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/17/2020	AW	0.60	Communicate with K. Duff and M. Rachlis regarding notice to claimant regarding upcoming hearing (.1); email claimant telephonic hearing access information (.1); draft email to claimant's spouse regarding needed documents (.2); draft email to claimant and communicate with K.Duff and J. Wine regarding same (.1); email accountant regarding claimants' entities (.1).  Claims Administration & Objections
	MR	4.70	Continue preparation for upcoming hearing (3.0); participate in meeting with SEC (.5); attend hearing before Judge Lee (.9); follow up on proposed order (.3).  Claims Administration & Objections
12/18/2020	KMP	0.40	Work on draft notice letter to potential claimant (638 Avers).  Claims Administration & Objections
	JRW	2.70	Draft proposed order on claims process (1.8); revise same to incorporate comments from K. Duff and M. Rachlis (.7) and related email to claimants' counsel and SEC (.1); telephone conference with counsel for tenant regarding claim (7110 S Cornell) (.1).  Claims Administration & Objections
	MR	0.70	Attention to order on claims and follow up and exchanges regarding same with J. Wine and K. Duff.  Claims Administration & Objections
12/21/2020	JRW	1.00	Attention to responding to claimant inquiries and related telephone conference with A. Watychowicz (.2); telephone conference with claimants' counsel regarding claims process (.2); confer with A. Watychowicz regarding preparation of email service lists and email to vendor regarding same (.2); exchange correspondence with claimant's counsel regarding proposed claims process and order and related review of redlines (.4).  Claims Administration & Objections
	AW	1.10	Review claims and correspondence from claimants and respond to same (.4); communicate with K. Duff regarding passing of claimant and response to claimant's spouse (.2); call with J. Wine regarding contact lists on property by property basis and communicate with claims vendor regarding same and estimate cost (.3); attention to entered confidentiality order and email counsel regarding same (.1); attention to deadlines set by Judge Lee and update docket (.2).  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/21/2020	AEP	1.40	<p>Teleconference with K. Duff regarding revisions to estimated closing costs associated with prospective credit bid conveyance of receivership property (638 N Avers), including conceptual analysis of potential payment of same from insurance proceeds (.5); further teleconference with K. Duff regarding global claims analysis issues (.6); review final drafts of spreadsheets associated with credit bid on receivership property (638 Avers) and provide comments to K. Duff (.3).</p> <p>Claims Administration &amp; Objections</p>
12/22/2020	KMP	0.30	<p>Revise and finalize notice letter to potential claimant (638 Avers) and prepare transmittal of same.</p> <p>Claims Administration &amp; Objections</p>
	JRW	2.80	<p>Email exchange regarding EquityBuild documents (.1); review proof of claim documentation and related correspondence with A. Porter (.6); review redlines of proposed order from claimants' counsel, K. Duff and M. Rachlis and further revise same to incorporate comments (1.8); confer with A. Watychowicz and K. Duff regarding response to claimant inquiry (.1); exchange correspondence with claimant's counsel and M. Rachlis regarding EquityBuild documents (.2).</p> <p>Claims Administration &amp; Objections</p>
	AW	0.80	<p>Revisions to email to claimant's counsel, communicate with K. Duff and J. Wine regarding revisions, and finalize response email (.2); communicate with K. Duff and J. Wine regarding demand from claimant and proposed response (.2); draft notice of receivership to collection agency and email K. Duff and J. Wine regarding proposed revisions (.2); assist K. Pritchard in service of notice of receivership (.1); communicate with accountant regarding collection notice (.1).</p> <p>Claims Administration &amp; Objections</p>
	MR	2.10	<p>Further review and revise of draft order on claims and follow up on same and other issues on claims process, and work with K. Duff and J. Wine regarding addressing such issues.</p> <p>Claims Administration &amp; Objections</p>
12/23/2020	JRW	3.50	<p>Review and reconcile redlines of proposed order and claims process received from claimants' counsel (.5); conference call with claimants' counsel regarding proposed order and claims process (.8); draft response to claimant inquiry and related exchange of correspondence with K. Duff (.4); further revision to proposed order and related exchange of correspondence with K. Duff (.9); telephone conference with document vendor regarding proposal for documents produced in response to standard discovery requests (.2); telephone conference with e-discovery vendor regarding database options and related review of materials and correspondence with M. Rachlis and K. Duff regarding same (.7).</p> <p>Claims Administration &amp; Objections</p>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/23/2020	MR	0.50	Attention to issues on proposed order and other issues on claims.  Claims Administration & Objections
12/24/2020	JRW	3.80	Further revise proposed order based on additional revisions from claimants' counsel (.3); conference call with claimants' regarding proposed claims process (1.5); review claimants' counsel's revisions to claims process outline (.4); conference with K. Duff and M. Rachlis regarding same (.9) and further revision and annotation of outline (.7).  Claims Administration & Objections
	MR	0.90	Review orders and attention to claims process issues and participate in meeting with K. Duff and J. Wine.  Claims Administration & Objections
12/28/2020	JRW	4.10	Exchange correspondence with K. Duff regarding claimant inquiry (.2); review claim forms and prepare representative sample (1.1); begin checklist for claim review procedure (.3); review institutional lender claim (.1); revise standard discovery to institutional lenders and related review of October 27 hearing transcript (.2); conference call with K. Duff, A. Porter, M. Rachlis and A. Watychowicz regarding claims process and claims review (2.2).  Claims Administration & Objections
	AW	2.70	Confer with K. Duff, M. Rachlis, J. Wine, A. Porter, and J. Porter regarding claims review (2.4); attention to email from claimant and communicate with counsel regarding same (.1); draft follow up correspondence to collection company and request input from K. Duff (.2).  Claims Administration & Objections
	AEP	4.00	Conference call with team to discuss legal and factual overview of priority claims and articulate strategy for reviewing and assessing competing claims associated with properties (2.0); create spreadsheets of EBF mortgagees and summaries of internal records pertaining to each mortgagee's loan balance in connection with receivership properties (3074 E Cheltenham, 7750 S Muskegon) (2.0).  Claims Administration & Objections
	JP	2.00	Work with team on legal and factual analysis of priority claims and articulate strategy for reviewing and assessing competing claims associated with properties encumbered by loan.  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/28/2020	MR	3.10	Begin review of claims relating to first tranche properties (.9);work with team on issues relating to same (2.2).  Claims Administration & Objections
12/29/2020	JRW	5.00	Telephone conference with A. Watychowicz regarding mortgagee listings and claims analysis (.1); study claims against property (3074 Cheltenham) and supporting documentation and prepare spreadsheet of results (3.2); confer with K. Duff, A. Porter, M. Rachlis and A. Watychowicz regarding procedures for analyzing claims (1.7).  Claims Administration & Objections
	AW	2.50	Confer with K. Duff, M. Rachlis, J. Wine, A. Porter, and J. Porter regarding claims review (1.7); locate and review mortgagees' lists on property by property basis and email J. Wine regarding same (.3); finalize follow up letter to creditor and send via mail (.3); attention to filed objections to eleventh motion to approve sale, forward same to counsel, and follow up with K. Duff regarding order entered in relation to motion (7237 Bennett) (.2).  Claims Administration & Objections
	AEP	1.70	Follow-up conference call with team to discuss methodology for reviewing claims, including legal and factual issues associated therewith.  Claims Administration & Objections
	JP	1.70	Follow-up conference call with team to discuss methodology for reviewing claims, including legal and factual issues associated therewith.  Claims Administration & Objections
	MR	3.20	Attention to claims related issues (.3); participate in meeting with K. Duff, J. Wine and A. Watychowicz regarding claims review (1.7); work on claims process outline issues (1.2).  Claims Administration & Objections
12/30/2020	JRW	5.70	Review redlines and comments regarding proposed claims process outline (.5); conference call with claimants' counsel regarding same (1.8); prepare summary and exchange correspondence with K. Duff and M. Rachlis regarding same (.5); telephone conference with A. Watychowicz regarding process for claims verification and review (.3); review claims against property (7625 S East End) and update spreadsheet (1.9); related review of file for property (7625 S East End) (.5); confer with claimants' counsel regarding report to court regarding process (.1); exchange correspondence with K. Duff and A. Watychowicz regarding response to claimant inquiry (.1).  Claims Administration & Objections
	JP	2.00	Prepare separate EBF mortgagee spreadsheets for all properties in receivership portfolio.  Claims Administration & Objections



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
12/30/2020	MR	1.00	Attention to claims process issues and follow up emails on same to K. Duff and J. Wine.  Claims Administration & Objections		
12/31/2020	JRW	2.20	Prepare revised claims process outline with comments for further discussion.  Claims Administration & Objections		
	AW	0.50	Attention to email from claimant's spouse, response to same, update contact information, and request update to database (.3); attention to voicemail from claimant requesting update, review prior correspondence with claimant, and response to same (.2).  Claims Administration & Objections		
	MR	0.30	Attention to email on claims process issues.  Claims Administration & Objections		
SUBTOTAL:				1[86.30	52805.50]

Tax Issues

12/4/2020	KMP	1.70	Review and compile statements for Receiver's accounts for October and November for transmittal to tax administrator.  Tax Issues		
12/7/2020	KMP	2.50	Communications with tax administrator regarding request for bank statements for 2020 (.2); review and compile statements for Receiver's property accounts for January-March in connection with same (2.3).  Tax Issues		
12/8/2020	KMP	4.00	Forward tax notices from federal agency to tax accountant (.2); forward forms 1099-S from recent property sales (7508 S Essex, 7201 S Dorchester) to tax account and tax administrator (.2); communications with tax administrator regarding request for bank statements for 2020 (.2); review and compile statements for Receiver's property accounts for April-August and November in connection with same (3.1); upload statements to tax administrator's portal (.3).  Tax Issues		
12/16/2020	AW	1.20	Research regarding EIN for entity as per K. Duff's request.  Tax Issues		

Date    Indiv   Hours   Description

---

SUBTOTAL:

[ 9.40                      1316.00]

421.50                      \$105,905.50

Other ChargesDescriptionBusiness Operations

Software licenses (Google - \$96.00; InSynq - \$266.50)	362.50
Online research for December 2020	308.32
Photocopies for December 2020	9.10

SUBTOTAL: [ 679.92]

Total Other Charges \$679.92

Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Jodi Wine	109.70	260.00	\$28,522.00
Ania Watychowicz	37.60	140.00	\$5,264.00
Julia Porter	5.70	95.00	\$541.50
Justyna Rak	98.00	140.00	\$13,720.00
Kathleen M. Pritchard	34.10	140.00	\$4,774.00
Stoja Zjalic	0.40	110.00	\$44.00
Andrew E. Porter	54.20	390.00	\$21,138.00
Ellen Duff	12.70	390.00	\$4,953.00
Michael Rachlis	69.10	390.00	\$26,949.00

**SUMMARY**

Legal Services	\$105,905.50
Other Charges	\$679.92
<b>TOTAL DUE</b>	<b>\$106,585.42</b>

# **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.208409

Date 12/29/2020  
Client No.BW10753

---

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

B. Fish	3.25 hours @ \$110	\$ 357.50
G. Castaldi	6.25 hours @ \$110	687.50
D. Arce	2.75 hours @ \$ 68	187.00
D. Weinberg	3.20 hours @ \$275	<u>880.00</u>
	Current Amount Due	\$ <u>2,112.00</u>

*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	10/21/2020	Arce	ACCTG	CWU	4200	Conversation with Ellen Duff re: Equitybuild project	0.25	17.00	0.00
001	10/27/2020	Arce	ACCTG	CWU	4200	Conference call with Ellen Duff, GC and Justyna Rak	1.50	102.00	0.00
001	10/27/2020	Arce	ACCTG	CWU	4200	Preparing reports for Ellen Duff.	0.75	51.00	0.00
001	10/30/2020	Arce	ACCTG	CWU	4200	Creating and sending property report to Ellen Duff.	0.25	17.00	0.00
001	10/21/2020	Castaldi	TAX	1065	2100	13 Partnership Returns	1.25	137.50	0.00
001	10/20/2020	Castaldi	TAX	1065	2100	2017 partnership returns	0.25	27.50	0.00
001	10/27/2020	Castaldi	ACCTG	CWU	4235	Phone call with Ellen Duff & looking and sorting through documentation.	3.00	330.00	0.00
001	10/30/2020	Castaldi	ACCTG	CWU	4235	Rolling forward prior months in order to begin working on June.	1.75	192.50	0.00
001	10/6/2020	Fish	ACCTG	CWU	4200	update schedule for sold properties	0.50	55.00	0.00
001	10/7/2020	Fish	ACCTG	CWU	4200	making adjustments to the May statements for receivership	0.50	55.00	0.00
001	10/7/2020	Fish	ACCTG	CWU	4200	completed summary reports for Restoration and Reimbursement Owed as of 5-31-2020	1.50	165.00	0.00
001	10/9/2020	Fish	ACCTG	CWU	4200	create schedule for sold properties as of 5/31/20 for recievership	0.75	82.50	0.00
001	10/22/2020	Weinberg	TAX	1065	2130	Wording for 2017 Partnership returns	0.40	110.00	0.00
001	10/29/2020	Weinberg	TAX	1065	2105	Review & Process 13 2017 Partnership returns	2.80	770.00	0.00
							15.45	2,112.00	0.00

Invoice Reconciliation

Billed WIP	2,112.00
Adjusted	0.00
Progress Amount	0.00
-----	
Gross Amount	2,112.00
(Apply Prior Progress)	0.00
Sales Tax	0.00
(Sales Tax Applied)	0.00
-----	
Net Invoice	2,112.00

**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.208410*

*Date 12/30/2020*  
*Client No.BW10753*

---

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

B. Fish	1.00 hour @ \$110	\$ 110.00
G. Castaldi	23.75 hours @ \$110	2,612.50
D. Arce	26.50 hours @ \$ 68	<u>1,802.00</u>
	Current Amount Due	\$ <u>4,524.50</u>

*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	11/19/2020	Arce	ACCTG	CWU	4200	working on monthly reports.	1.00	68.00	0.00
001	11/25/2020	Arce	ACCTG	CWU	4200	Monthly Reports.	1.00	68.00	0.00
001	11/24/2020	Arce	ACCTG	CWU	4200	Monthly reports	4.00	272.00	0.00
001	11/10/2020	Arce	ACCTG	CWU	4200	Equitybuild reports	0.75	51.00	0.00
001	11/11/2020	Arce	ACCTG	CWU	4200	Reports	2.00	136.00	0.00
001	11/13/2020	Arce	ACCTG	CWU	4200	Monthly reports	4.75	323.00	0.00
001	11/14/2020	Arce	ACCTG	CWU	4200	Monthly reports	2.00	136.00	0.00
001	11/30/2020	Arce	ACCTG	CWU	4200	Monthly reports	2.00	136.00	0.00
001	11/3/2020	Arce	ACCTG	CWU	4200	Reports	4.00	272.00	0.00
001	11/5/2020	Arce	ACCTG	CWU	4200	Working on June Reports	3.00	204.00	0.00
001	11/6/2020	Arce	ACCTG	CWU	4200	Working on reports.	2.00	136.00	0.00
001	11/24/2020	Castaldi	ACCTG	CWU	4235	July Property Statements	1.50	165.00	0.00
001	11/25/2020	Castaldi	ACCTG	CWU	4235	July Property Statements	0.50	55.00	0.00
001	11/12/2020	Castaldi	ACCTG	CWU	4235	June Property Statements	3.75	412.50	0.00
001	11/10/2020	Castaldi	ACCTG	CWU	4235	June Property statements	1.25	137.50	0.00
001	11/13/2020	Castaldi	ACCTG	CWU	4235	June Property statements	1.00	110.00	0.00
001	11/30/2020	Castaldi	ACCTG	CWU	4235	August Property Statements	0.50	55.00	0.00
001	11/6/2020	Castaldi	CONSU	AUP	3570	June Property Statements	4.00	440.00	0.00
001	11/2/2020	Castaldi	ACCTG	CWU	4235	June Property Statements	1.25	137.50	0.00
001	11/5/2020	Castaldi	ACCTG	CWU	4235	June Property Statements	3.50	385.00	0.00
001	11/16/2020	Castaldi	ACCTG	CWU	4235	July Property statements	1.00	110.00	0.00
001	11/17/2020	Castaldi	ACCTG	CWU	4235	July Property Statements	2.50	275.00	0.00
001	11/18/2020	Castaldi	ACCTG	CWU	4235	July property statements	3.00	330.00	0.00
001	11/11/2020	Fish	ACCTG	CWU	4200	enter insurance charges for June, July and Aug schedules.	1.00	110.00	0.00
							51.25	4,524.50	0.00

Invoice Reconciliation

Billed WIP	4,524.50
Adjusted	0.00
Progress Amount	0.00
-----	
Gross Amount	4,524.50
(Apply Prior Progress)	0.00
Sales Tax	0.00
(Sales Tax Applied)	0.00
-----	
Net Invoice	4,524.50

**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.208411*

*Date 12/31/2020*  
*Client No.BW10753*

---

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

G. Castaldi	27.75 hours @ \$110	\$	3,052.50
D. Arce	9.50 hours @ \$ 68		<u>646.00</u>
	Current Amount Due	\$	<u>3,698.50</u>

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

PAYMENT DUE UPON RECEIPT

Invoice #208411 for EQUITYBUILD INC RECEIVERSHIP (BW10753.001)

ENG	DATE	EMPLOYEE	CAT	SUBCAT	SERVICE	MEMO	HOURS	BILLED	ADJUSTED
001	12/10/2020	Arce	ACCTG	CWU	4200	bookkeeping	3.50	238.00	0.00
001	12/11/2020	Arce	ACCTG	CWU	4200	Monthly reports	0.25	17.00	0.00
001	12/4/2020	Arce	ACCTG	CWU	4200	Bookkeeping	2.00	136.00	0.00
001	12/8/2020	Arce	ACCTG	CWU	4200	Monthly reports	3.00	204.00	0.00
001	12/16/2020	Arce	ACCTG	CWU	4200	Bookkeeping	0.75	51.00	0.00
001	12/21/2020	Castaldi	ACCTG	CWU	4235	September property statements	0.50	55.00	0.00
001	12/14/2020	Castaldi	ACCTG	CWU	4235	September property statements	3.50	385.00	0.00
001	12/15/2020	Castaldi	ACCTG	CWU	4235	September Property Statements	3.50	385.00	0.00
001	12/16/2020	Castaldi	ACCTG	CWU	4235	September Property Statements	3.50	385.00	0.00
001	12/17/2020	Castaldi	ACCTG	CWU	4235	September Property Statements	1.75	192.50	0.00
001	12/28/2020	Castaldi	ACCTG	CWU	4235	September Property statements	4.00	440.00	0.00
001	12/22/2020	Castaldi	ACCTG	CWU	4235	September Property Statements	1.50	165.00	0.00
001	12/1/2020	Castaldi	ACCTG	CWU	4235	August property statements	4.00	440.00	0.00
001	12/4/2020	Castaldi	ACCTG	CWU	4235	September Property Statements	2.00	220.00	0.00
001	12/18/2020	Castaldi	ACCTG	CWU	4235	September Property Statements	3.50	385.00	0.00
							37.25	3,698.50	0.00

Invoice Reconciliation

Billed WIP	3,698.50
Adjusted	0.00
Progress Amount	0.00
	-----
Gross Amount	3,698.50
(Apply Prior Progress)	0.00
Sales Tax	0.00
(Sales Tax Applied)	0.00
	-----
Net Invoice	3,698.50

# **EXHIBIT I**



4123 Lankershim Boulevard  
North Hollywood, CA 91602

Kevin B. Duff  
Receiver for EquityBuild Inc  
Rachlis Duff Adler Peel & Kaplan LLC  
542 S. Dearborn Street, Suite 900  
Chicago, IL 60605

Invoice: 537022  
ID: 3077400  
Date: 12/31/2020  
Due Date: 12/31/2020

SEC E.A. reference:  
SEC/DC Case Number: 1:18-cv-05587  
Responsible Party for Payment:  
Tax Administrator Appointment Date:

For professional services rendered as follows:

<u>DATE</u>	<u>SERVICE</u>	<u>STAFF</u>	<u>SEC DISCOUNT RATE</u>	<u>HOURS</u>	<u>AMOUNT</u>
<b>General Consulting Services - General Consulting</b>					
07/10/2020	General Bookkeeping Processing all Bank Statements for client.	CA	56.000	1.00	56.00
<b>Information Return Reporting Services - Information Return Reporting</b>					
02/28/2020	Clear Review Notes 1099 correction.	ER	160.000	0.25	40.00
<b>Qualified Settlement Fund Services - Estimated Taxes</b>					
07/05/2020	Preparation Quarterly estimated tax payments 2020 Q1.	JGM	212.000	0.20	42.40
07/08/2020	Preparation Quarterly estimated tax payments 2020 Q1.	JGM	212.000	0.90	190.80
07/10/2020	Preparation Quarterly estimated tax payments 2020 Q1.	JGM	212.000	0.20	42.40
09/11/2020	Preparation Quarterly estimated tax payments 2020 Q3.	JGM	212.000	0.20	42.40
12/06/2020	Preparation Quarterly estimated tax payments 2020 Q4.	JGM	216.000	0.40	86.40
<b>Qualified Settlement Fund Services - Tax Return</b>					
06/29/2020	Preparation Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return.	JAC	168.000	0.25	42.00
07/08/2020	Preparation Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return.	JGM	212.000	0.70	148.40
07/10/2020	Preparation Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return.	JGM	212.000	0.30	63.60
07/10/2020	Review	ER	160.000	0.10	16.00

	Extension efile.				
10/09/2020	Preparation	JGM	212.000	5.50	1,166.00
	Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return.				
10/10/2020	Preparation	JGM	212.000	6.50	1,378.00
	Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return.				
10/11/2020	Preparation	JGM	212.000	5.40	1,144.80
	Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return.				
10/12/2020	Final Review	JD	440.000	1.00	440.00
10/12/2020	Assemble	NAN	64.000	0.25	16.00
	Assemble 2019 1120SF				
12/08/2020	Preparation	JAC	180.000	1.10	198.00
	Preparation of the 2020 Qualified Settlement Fund Income Tax Return.				
<b>Qualified Settlement Fund Services - Tax Return</b>					
03/23/2020	Review	ER	160.000	0.10	16.00
	Vendor 1099 correction - file with IRS.				
07/10/2020	Preparation	JAC	168.000	0.85	142.80
	Preparation of 2019 tax returns.				
07/27/2020	Preparation	JAC	168.000	0.20	33.60
	Preparation of the 2019 Qualified Settlement Fund Income Tax Return. Request Forms 1099-S from receiver and reach out re: approach to property sales.				
10/10/2020	Preparation	JAC	168.000	0.70	117.60
	Review of 2019 tax returns.				
12/07/2020	Preparation	JAC	180.000	1.00	180.00
	Preparation of the 2020 Qualified Settlement Fund Income Tax Return.				
					5,603.20
					\$5,603.20

PLEASE REMIT PAYMENT VIA WIRE TRANSFER OR CHECK  
 ACCORDING TO THE INSTRUCTIONS BELOW:  
 WIRE FUNDS TO:

CITY NATIONAL BANK  
 400 N. ROXBURY DRIVE, 5TH FLOOR  
 BEVERLY HILLS, CA 90210  
 ABA NUMBER 122016066 SWIFT CODE CINAUS6L  
 BENEFICIARY ACCOUNT NUMBER 113-238313  
 BENEFICIARY ACCOUNT NAME: MILLER KAPLAN ARASE LLP

MAKE CHECK PAYABLE TO:

MILLER KAPLAN ARASE LLP  
 4123 LANKERSHIM BLVD, NORTH HOLLYWOOD, CA 91602-2828

<u>12/31/2020</u>	<u>11/30/2020</u>	<u>10/31/2020</u>	<u>09/30/2020</u>	<u>08/31/2020+</u>	<u>Total</u>
5,603.20	0.00	0.00	0.00	4,391.60	\$9,994.80

# **EXHIBIT J**



**INVOICE**  
151002

**Bill-to**

Mr. Kevin Duff  
Attn: Account Payable  
542 S Dearborn Street  
Suite 900  
CHICAGO, IL 60605.

Transaction 151002  
Invoice Date 2/10/21  
Legal Entity Axos Bank

Line Total	120.00
Sales Tax	0.00
Shipping	0.00
<hr/>	
Total	120.00
Payments	0.00
Credits	0.00
Financial Charges	0.00

**Payment Terms** IMMEDIATE      **Due Date** 2/10/21      **Balance Due** \$120.00

No.	Product	Description	UOM	Quantity	Unit Price	Amount
1		Clerical/Administrative Support	Each	2	35.00	70.00
2		Monthly Claims Extraction	Each	.5	100.00	50.00
Line Total						120.00

**Remit to**  
Axos Bank  
Attn: Accounts Receivable  
7300 College Blvd.  
Suite 450  
Overland Park, KANSAS 66210.

**Comments**



Employee	Date	Time	Description: Data Entry
Joanna	10/16/2020	0.5	Data Entry: Enter new claims for Skurski Trust
Joanna	10/19/2020	0.25	Data Entry: Updated email, phone numbers. 3 claimants
Joanna	11/4/2020	0.5	Data Entry: Updated contact info on multiple claimants
Joanna	11/10/2020	0.5	Data Entry: Added documents to Jason Ragan claims
Joanna	11/20/2020	0.25	Data Entry: Updated 2 claims, name change and documents
<b>Joanna total</b>		<b>2</b>	
Employee	Date	Time	Description: Programming
Cheryl	10/4/2020	0.5	Program: Researching what client said was a missing claim
<b>Cheryl total</b>		<b>0.5</b>	
Employee	Date	Time	Description: Project Manager
Gena		0	
<b>Gena total</b>		<b>0</b>	

# **EXHIBIT K**



## Prometheus Technologies, Inc.

2639 Lawndale Ave • Evanston, Illinois 60201  
 ph: 312-405-3836 • www.prometheus.com

# Invoice

<b>BILL TO</b>
EquityBuild Kevin Duff

<b>DATE</b>	<b>INVOICE #</b>
1/14/2021	12327

<b>TERMS</b>	<b>PROJECT</b>

QUANTITY	SERVICED	DESCRIPTION	RATE	AMOUNT
1	10/5/2020	Put up a number of articles. 9 articles. On website.	110.00	110.00
0.25	10/6/2020	Posted 1 article and had to upload PDF manually because it was too big.	110.00	27.50
1	10/19/2020	Uploaded 7 items one of them was too big of a pdf had to manually do this.	110.00	110.00
1	10/27/2020	Uploaded 8 articles with attachments.	110.00	110.00
0.25	10/29/2020	Uploaded one article to EB section.	110.00	27.50
0.5	11/9/2020	Looked into website: app.propertyware.com to see if there is a viable way to download everything there easily. Tried several options and looked through the help section. Responded back to Kathy about thoughts after investigating website closer.	110.00	55.00
1.5	11/11/2020	Uploaded 23 EB documents and put in 23 article links. Tested it out.	110.00	165.00
0.25	11/18/2020	Fix text typo for EB website.	110.00	27.50
0.5	11/24/2020	Uploaded 3 articles pdf and adjust EB website.	110.00	55.00
1	12/7/2020	Updated several articles and PDF upload.	110.00	110.00
0.25	12/9/2020	Uploaded 1 pdf and setup 1 article link for EB page.	110.00	27.50
1.5	12/31/2020	Edited website and Uploaded PDF's and put them in order.	110.00	165.00
		Illinois Sales Tax	10.25%	0.00
Thank you for your business.			<b>Total</b>	<b>\$990.00</b>