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

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

## RECEIVER'S ELEVENTH 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 Eleventh Interim Application ("Application") for the First Quarter 2021, 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"), 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. §877q(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. ELEVENTH INTERIM APPLICATION

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

<sup>&</sup>lt;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 January 1, 2021 through March 31,2021.
- b. The names and hourly rates of all professionals for RDP, BrookWeiner, and Miller Kaplan, as well as Prometheum's hourly rates, are attached as **Exhibit A.**
- c. This is the Receiver's Eleventh 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 First Quarter 2021 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 March 31, 2021 was \$1,102,611.53. 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 First Quarter 2021, one of the Receiver's primary focuses continued to be the preservation, operation, maintenance, and sale of the 49 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 First Quarter 2021, 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.

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 resolved two Department of Buildings matters, obtaining an order dismissing the

EquityBuild entity from the cases (8209 S Ellis and 1449 N. Talman). The Receiver also was able to resolve two administrative matters brought by the Department of Sanitation, moving to set aside a default judgment, and obtaining a release of a \$4,021.59 lien and nonsuit order in one matter (4611 S Drexel), and a paying a nominal fine in another (4750 S Indiana). Counsel for the Receiver also worked with corporation counsel with regards to four pending Department of Housing cases, and obtained one dismissal and three continuances. During the quarter, the Receiver's counsel received numerous orders continuing hearings and five new notices of violations, and maintained its docket for all pending matters. As of March 31, 2021, there remained 13 known open City of Chicago matters involving code violations, including 3 pending City of Chicago municipal housing court matters, 9 pending City of Chicago administrative proceedings filed by the Buildings Department and 1 pending administrative proceeding filed by the Department of Sanitation.

### ii. Property Sales

The Receiver and his retained professionals did not close any sales during the First Quarter 2021, as the Receiver awaited rulings on the Tenth and Eleventh motions to confirm sales.

On March 31, 2021, the Court granted the remainder of the Receiver's Tenth Motion to Confirm Sales of the following 8 apartment buildings (Dkt. Nos. 964, 966):

- 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
- 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<sup>2</sup>

<sup>&</sup>lt;sup>2</sup> As of the date of this Report, the Receiver has closed or scheduled the closings of six of these eight properties, and anticipates the remaining two properties will close during the second quarter as well.

Briefing on objections to the Eleventh Motion to Confirm Sales was completed early in the quarter (Dkt. Nos. 902, 918, 921) The Receiver also submitted a proposed order to the Court regarding the un-objected to Motion to Approve Use of Sales Proceeds to pay property manager expenses, an administrative judgment, and an insurance deductible, which was granted on April 30, 2021. (Dkt. No. 984)

On March 31, 2021, the Receiver filed the Twelfth Motion to Confirm the Sale of the property located at 638 N. Avers (Dkt. No. 962). Objections to the motion were filed on April 22, 2021 (Dkt. No. 974) and briefing will be completed during the second quarter.

Following months of active marketing by the Receiver and his real estate professionals of the single-family home portfolio consisting of the following 37 properties (containing 47 units), six competing bidders submitted offers to purchase the portfolio during the second week of January 2021:

- 1017 West 102nd Street, Chicago, IL 60643
- 1516 East 85th Place, Chicago, IL 60619
- 2136 W 83rd Street, Chicago, IL 60620
- 417 Oglesby Avenue, Chicago, IL 60409
- 7922 S Luella Avenue, Chicago, IL 60617
- 7925 S Kingston Avenue, Chicago, IL 60617
- 7933 S Kingston Avenue, Chicago, IL 60617
- 8030 S Marquette Avenue, Chicago, IL 60617
- 8104 S Kingston Avenue, Chicago, IL 60617
- 8403 S Aberdeen Street, Chicago, IL 60620
- 8405 S Marquette Avenue, Chicago, IL 60617
- 8529 S Rhodes Avenue, Chicago, IL 60619
- 8800 S Ada Street, Chicago, IL 60620
- 9212 S Parnell Avenue, Chicago, IL 60620
- 10012 S LaSalle Avenue, Chicago, IL 60628
- 11318 S Church Street, Chicago, IL 60643
- 3213 S Throop Street, Chicago, IL 60608
- 3723 W 68th Place, Chicago, IL 60629
- 406 E 87th Place, Chicago, IL 60619
- 61 E 92nd Street, Chicago, IL 60619
- 6554 S Rhodes Avenue, Chicago, IL 60637
- 6825 S Indiana Avenue, Chicago, IL 60637

- 7210 S Vernon Avenue, Chicago, IL 60619
- 7712 S Euclid Avenue, Chicago, IL 60649
- 7953 S Woodlawn Avenue, Chicago, IL 60619
- 8107 S Kingston Avenue, Chicago, IL 60617
- 8346 S Constance Avenue, Chicago, IL 60617
- 8432 S Essex Avenue, Chicago, IL 60617
- 8517 S Vernon Avenue, Chicago, IL 60619
- 2129 W 71st Street, Chicago, IL 60636
- 9610 S Woodlawn Avenue, Chicago, IL 60628
- 5437 S Laflin Street, Chicago, IL 60609
- 6759 S Indiana Avenue, Chicago, IL 60637
- 1401 W 109th Place, Chicago, IL 60643
- 310 E 50th Street, Chicago, IL 60615
- 6807 S Indiana Avenue, Chicago, IL 60637
- 1414-18 E 62nd Place, Chicago, IL 60637

During the quarter the Receiver, with the advice of his real estate advisors, accepted an offer to purchase the portfolio for \$4.1 million. Following due diligence inspections of the properties pursuant to an inspection contingency, the Receiver agreed to reduce the purchase price by \$100,000, and the broker agreed to reduce its commission by \$18,820, in order to prevent the prospective purchaser from exercising its right to terminate. In connection with the purchase price reduction, the Receiver and the institutional lenders purporting to hold first-position priority mortgages against various tranches of the single-family homes worked to agree upon an allocation of the portfolio purchase price to each of the 37 properties.

### iii. The Financial Reporting and Rents Restoration

During the First Quarter 2021, the Receiver worked with his retained professionals to prepare reports for the period ended September 30, 2020 that included a monthly accounting for the months of June, July, August, and September 2020 with respect to rents generated by, and expenses incurred, in connection with the properties on which the institutional lenders assert liens. Those reports 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. Further, during the quarter the Receiver worked with his retained professionals on similar reports for the three month period ending December 31, 2020, which will be distributed to lenders' counsel in the second quarter 2021.

### iv. Open Litigation

During the First Quarter 2021, fact and expert discovery were completed in the matter captioned *Byrd v. EquityBuild, Inc., et al.*, Case No. 18 L 1993, Circuit Court of Cook County. The parties are awaiting a trial setting date and engaging in settlement discussions.

### Notice of Appointment of Receiver

During the First Quarter 2021, 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.

### v. Control of Receivership Property and Records

During the First Quarter 2021, the Receiver continued efforts to locate and preserve all EquityBuild property and records. The Receiver maintained two platforms of records and data during the First Quarter 2021.

### vi. Factual Investigation

During the First Quarter 2021, 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 First Quarter 2021, the Receiver and his retained counsel devoted efforts to claims asserted in state court against former EquityBuild professionals: (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. These claims are for professional malpractice and aiding and abetting the Cohen's breaches of their fiduciary duties. No dispositive motions were filed at the pleadings stage, and the discovery phase commenced, with each of the parties having propounded both document requests and interrogatories, and the Receiver having made a substantial production of documents.

### vii. <u>Tax Issues</u>

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.

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 and the First Quarter 2021, Miller Kaplan prepared and filed the 2019 Qualified Settlement Fund Income Tax Return, paid quarterly estimated taxes for the year 2020, and prepared and filed the 2020 Qualified Settlement Fund Income Tax return.

### viii. 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. <u>Creditors and Claims Against the Receivership Estate</u>

During the First Quarter 2021, 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

First Quarter 2021 Status Report filed on April 30, 2021 (Dkt. No. 985 at Ex. 7) This work was reasonable, necessary, and beneficial to the Receivership estate, and has allowed the Receiver's claims vendor (1) to organize, on a property-by-property basis, the claim forms and supporting documentation that claimants have submitted to the Receiver, and (2) to provide each claimant who did not opt out of the Confidentiality Order with digital links for the transfer of the claim forms and supporting documentation of other claimants asserting claims against the same property or properties in the receivership estate, 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.

During the First Quarter 2021, the Receiver and his counsel continued to work with counsel for institutional lenders and investor-lenders in furtherance of the claims resolution process. At the Court's direction, the parties held several extended conference calls and exchanged multiple

rounds of drafts of Joint Status Reports filed on January 22, 2021 (Dkt. No. 928) and March 5, 2021 (Dkt. No. 953). These joint reports (1) provided outlines of the proposed process for the Court's resolution of disputed claims, setting forth the areas of the parties' agreement and disagreement, (2) set forth revised drafts incorporating the Court's rulings and remaining disputes regarding the standard discovery requests, (3) updated the Court on the parties' progress relating to the transfer of claims documentation, (4) updated the Court regarding the establishment of a database of EquityBuild documents that will be made available to claimants, (5) updated the Court on the status of property sales, and (6) provided information about regarding the briefing status of pending motions. The Receiver also divided the properties in the estate into proposed groupings and, after sharing his proposal with counsel for the institutional lenders and certain of the investor-lenders, submitted his proposal to the Court on February 5, 2021. (Dkt. No. 938)

On January 29, 2021, the Receiver participated in a telephonic hearing during which the Court orally ruled on remaining aspects of the Receiver's February 28, 2020 Motion for Approval of Process for Resolution of Disputed Claims (Dkt. No. 638), and directed the Receiver to prepare and submit a proposed global Claims Priority Resolution Process case management order memorializing the Court's rulings regarding the process for the orderly resolution of claims submitted to the Receiver in this matter. (Dkt. No. 931) The Receiver worked with counsel for the institutional lenders, certain of the investor lenders, and the SEC to submit two proposed orders, which were entered by the Court on February 9, 2021. (Dkt. Nos. 940 and 941)

During the quarter, the Receiver negotiated a vendor agreement with Avalon Legal to distribute the claim forms to claimants asserting an interest in the same properties. On February 9, 2021, the Receiver provided notice to claimants of the Court's Confidentiality Order and the 14-day opt-out period. On February 25, 2021, the Receiver filed a Notice of All Claimants Who

Do Not Agree to Abide by the Terms of the Agreed Confidentiality Order. (Dkt. No. 949) On February 26, 2021, the Receiver provided all claimants with information about the distribution of claim forms by Avalon, and Avalon began sending emails to claimants with links to download claims documentation on March 5, 2021. As of the date of this report, Avalon has finished sending the claims documentation for all properties in the receivership estate.

During the quarter, the Receiver also participated in the extended negotiation of a vendor agreement and license with CloudNine and TeamWerks to host EquityBuild's internal documents and provide access to all claimants. The Receiver prepared these EquityBuild documents for transfer to CloudNine, and worked to update and confirm the accuracy of claimants' email, address, and counsel records for use in the distribution of claim forms and the upcoming framing reports.

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 Receiver basic information, established burden provide the web (http://rdaplaw.net/receivership-for-equitybuild) for claimants and other interested parties to obtain information and certain court filings related to the Receivership estate, which remains in place today and continues to be best and most cost-effective mean of providing information regarding the status of this action.

### d. <u>Assets in Receivership Estate</u>

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**, which collectively contained \$51,276,556.83 as of March 31, 2021.

The Master Asset List does not include funds received or recovered after March 31, 2021. 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 Eleventh Status Report (First Quarter 2021) for additional information. (Dkt. No. 985)

### IV. BILLING ADDRESSED IN THIS APPLICATION

- 11. Pursuant to the Billing Instructions, the Receiver provides the following information regarding current billing:
  - a. <u>Total Compensation and Expenses Requested.</u>
    - i. In connection with his duties, the Receiver respectfully requests compensation for services rendered, totaling \$52,572.00 for the period of this Application. Copies of the Receiver's invoices for January, February, and March, 2021 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 \$194,337.70 for the period of this Application. Copies of RDP's invoices for January, February, and March, 2021 are attached as **Exhibit G.** 

- 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 \$5,953.50 for the period of this Application. Copies of BrookWeiner's invoices for January, February, and March, 2021, 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 \$5,988.00. These fees relate to services rendered during the period from the beginning of Miller Kaplan's retention through February 18, 2020 (\$4,364.00), which were not submitted with a prior fee application, as well as services rendered during February and March 2021 (\$1,624.00). Copies of Miller Kaplan's invoices are attached as **Exhibit I.**
- v. In connection with the IT services provided to the Receiver by Prometheum, the Receiver respectfully requests compensation for services rendered, along with reimbursement of expenses, totaling \$2,750.00 for the period of this Application. A copy of Prometheum's invoice is attached as <u>Exhibit J.</u>
- b. <u>Source of Funds for Requested Compensation and Expenses</u>. The Receiver requests that the above compensation and expenses be paid from the Receiver's operating account to the extent there are sufficient funds now or in the future. To the extent funds are insufficient, Receiver requests that the above compensation and expenses be paid pursuant to the receiver's lien

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

- c. <u>Eleventh Application for Payment of Professional Fees and Expenses</u>. This is the Receiver's Eleventh Interim Application.
- d. <u>Summary of Activity</u>. A "Summary of Activity," providing the total hours billed and the amount of billing for each person who billed time during the Application period (January 1, 2021 through March 31, 2021) 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 invoices (Exhibits H and J).

### V. REQUEST FOR RECEIVER'S LIEN

12. This Court has previously granted a receiver's lien and its previous 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 Courtapproved fees and expenses of the Receiver and the Retained Professionals are paid in accordance with the foregoing approved methodology.

VI. **CONCLUSION** 

WHEREFORE, the Receiver respectfully requests that the Court approve the Receiver's

Eleventh Interim Fee Application and enter an Order as follows:

Finding the fees and expenses of the Receiver and Receiver's retained a.

professionals, Rachlis Duff & Peel LLC, BrookWeiner, LLC, Miller Kaplan Arase LLP, and

Prometheum, as described in Exhibits F-J, respectively, to be reasonable and necessary to the

Receivership;

granting the Receiver and his retained professional a first priority administrative b.

lien against each of the real estate properties in the Receivership Estate and their sales proceeds

for payment of fees and costs;

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;

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

granting the Receiver all other relief which this Court deems just and proper. e.

Dated: May 17, 2021

Kevin B. Duff, Receiver

By:  $/_{\rm S}/$ 

Michael Rachlis

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### **RECEIVER'S CERTIFICATION**

- 1. Pursuant to the Billing Instructions, the Receiver certifies as follows regarding the Receiver's Eleventh 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 May 12, 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: May 17, 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 & Peel, LLC Rates

Professional/	Position	2021	2021
Paraprofessional		Standard	Discounted
		<b>Hourly Rates</b>	<b>Hourly Rates</b>
Michael Rachlis	Member	\$625	\$390
Drew G.A. Peel	Member	\$625	\$390
Ellen Duff	Of Counsel	\$585	\$390
Andrew E. Porter	Of Counsel	\$585	\$390
Jodi Rosen Wine	Of Counsel	\$585	\$260
Kathleen Pritchard	Paralegal	\$205	\$140
Ania Watychowicz	Paralegal	\$205	\$140
Justyna Rak	Paralegal	\$205	\$140
Stoja Zjalic	Legal Assistant	\$170	\$110
Julia Porter	Legal Assistant	\$170	\$95
Natalie Gastevich	Legal Assistant	\$170	\$95

BrookWeiner Billing Rates

20% discount from current standard rates

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

## Prometheum's Hourly Rate

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

# Miller Kaplan Arase LLP Schedule of Fees- Standard and Discounted Rates

Name Rate	e Per Hour Standard	Discounted 80%	<u>Title</u>
Jude Damasco	\$ 550.00	\$ 440.00	Partner
Julia Damasco	\$ 550.00	\$ 440.00	Partner
John Mandeville	\$ 255.00	\$ 204.00	Senior Acct.
John Mandeville	\$ 265.00	\$ 212.00 (rate in	crease Dec. 2019)
John Mandeville	\$ 270.00	\$ 216.00 (rate in	crease Dec. 2020)
Jessica Corbin	\$ 210.00	\$ 168.00	Acct. Staff
Jessica Corbin	\$ 225.00	\$ 180.00	Senior Acct.
		(rate in	ncrease 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

# Exhibit B

## Case: 1:18-cv-05587 Document #: 993-1 Filed: 05/17/21 Page 7 of 162 PageID #:32295

Interim Fee Application	Docket No. Application	IDate Filed	Amount Applicat	ion	Docket No. Order	Date of Order	Amou	nt Approved	Amount Paid	Am	oproved nount Unpaid of 9/30/20)
First (3d Q 2018)	411	June 12, 2019	\$	413,298.44	546	October 15, 2019	\$	413,298.44	\$ 413,298.44	\$	-
Second (4th Q 2018)	487	August 21, 2019	\$	553,968.43	547	October 15, 2019	\$	553,968.43	\$ 553,968.43	\$	-
Third (1st Q 2019)	569	November 1, 2019	\$	547,711.44	614	January 7, 2020	\$	547,711.04	\$ 547,711.04	\$	-
Fourth (2d Q 2019)	576	November 15, 2019	\$	499,214.42	614	January 7, 2020	\$	510,056.64	\$ 23,006.88	\$	487,049.76
Fifth (3d Q 2019)	608	December 20, 2019	\$	485,094.92	710	June 9, 2020	\$	485,094.92	\$ 5,290.00	\$	479,804.92
Sixth (4th Q 2019)	626	February 14, 2020	\$	297,791.41	710	June 9, 2020	\$	297,791.41	\$ 3,965.00	\$	293,826.41
Seventh (1st Q 2020)	755	July 28, 2020	\$	362,102.16	824	October 26, 2020	\$	362,102.16	\$ 4,658.75	\$	357,443.41
Eighth (2d Q 2020)	778	August 28, 2020	\$	451,944.97	824	October 25, 2020	\$	451,944.97	\$ 5,085.00	\$	446,859.97
Ninth (3d Q 2020)	885	November 30, 2020	\$	403,064.48	n/a	n/a		n/a	n/a	ı	
Tenth (4Q2020)	945	February 23, 2021	\$	379,388.01	n/a	n/a		n/a	n/a	ı	
										\$	2,064,984.47

# Exhibit C

# STANDARDIZED FUND ACCOUNTING REPORT for EQUITYBUILD, INC., et al. - Cash Basis Receivership; Civil Court Docket No. 18-cv-05587 Reporting Period 1/1/2021 to 3/31/2021

	nting (See Instructions):	Detail	Subtotal	<b>Grand Total</b>
Line 1	Beginning Balance (As of 1/1/2021):	\$1,181,881.43		\$1,181,881.43
	Increases in Fund Balance:	, , , , , , , ,		, , - ,
Line 2	Business Income			
Line 3	Cash and unliquidated assets			
Line 4	Interest/Dividend Income	\$699.45		
Line 5	Business Asset Liquidation	φουσ. 15		
Line 6	Personal Asset Liquidation			
Line 7	Net Income from Properties			
Line 8	Miscellaneous - Other <sup>1</sup>	\$18,725.00		
	Total Funds Available (Line 1-8):			\$1,201,305.88
	Decrease in Fund Balance:			
Line 9	Disbursements to Investors			
Line 10	Disbursements for receivership operations			
Line 10a	Disbursements to receiver or Other Profesionals			
Line 10b	Business Asset Expenses <sup>2</sup>	(\$98,694.35)		
	Personal Asset Expenses			
Line 10d	Investment Expenses			
Line 10e	Third-Party Litigation Expenses			
	1. Attorney Fees			
	2. Litigation Expenses			
	Total Third-Party Litigation Expenses		\$0.00	
Line 10f	Tax Administrator Fees and Bonds			
Line 10g	Federal and State Tax Payments			
	Total Disbursements for Receivership Operations		(\$98,694.35)	
Line 11	Disbursements for Distribution Expenses Paid by the Fund:			
Line 11a	Distribution Plan Development Expenses:			
	1. Fees:			
	Fund Administrator			
	Independent Distribution Consultant (IDC)			
	Distribution Agent			
	Consultants			
	Legal Advisers			
	Tax Advisers			
	2. Administrative Expenses			
	3. Miscellaneous			
	Total Plan Development Expenses		\$0.00	
Line 11b	Distribution Plan Implementation Expenses:			
	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 1/1/2021 to 3/31/2021

	Distribution Agent			
	Consultants			
	Legal Advisers	•		
	Tax Advisers			
	2. Administrative Expenses			
	3. Investor identification			
	Notice/Publishing Approved Plan			
	Claimant Identification			
	Claims Processing			
	Web Site Maintenance/Call Center			
	4. Fund Adminstrator Bond			
	5. Miscellaneous			
	6. Federal Account for Investor Restitution			
	(FAIR) reporting Expenses			
	Total Plan Implementation Expenses			
	Total Disbursement for Distribution Expenses Paid by the	e Fund	\$0.00	
Line 12	Disbursement to Court/Other:			
Line 12a	Investment Expenses/Court Registry Investment			
	System (CRIS) Fees			
Line 12b	Federal Tax Payments			
	Total Disbursement to Court/Others:			
	Total Funds Disbursed (Lines 1-12):			(\$98,694.35)
Line 13	Ending Balance (As of 3/31/2021):			\$1,102,611.53
Line 14	Ending Balance of Fund - Net Assets:			
Line 14a	Cash & Cash Equivalents			\$1,102,611.53
Line 14b	Investments (unliquidated Huber/Hubadex investments)			
Line 14c	Other Assets or uncleared Funds			
	Total Ending Balance of Fund - Net Assets			\$1,102,611.53

Receiver:		
	/s/ Kevin B. Duff	
_	(Signature)	

<sup>&</sup>lt;sup>1</sup> Refund of insurance premium financing payments for sold properties. TOTAL: \$18,725.00

<sup>&</sup>lt;sup>2</sup> Insurance (\$80,955.83); property utilities (\$10,297.39); property security installations (\$6,356.88); property management fees (\$1,000.00); rent restoration adjusments (\$84.25); TOTAL \$98,694.35.

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STANDARDIZED FUND ACCOUNTING REPORT for EQUITYBUILD, INC., et al. - Cash Basis
Receivership; Civil Court Docket No. 18-cv-05587
Reporting Period 1/1/2021 to 3/31/2021

	Kevin B. Duff, Receiver EquityBuild, Inc., et al.					
	(Printed Name)					
Date:	April 30, 2021					

# Exhibit D

### **Master Asset List**

Receiver's Account (as of 3/31/2021)					
Institution Account Information Amount					
AXOS Fiduciary Services	Checking #0181	\$975,800.21			
AXOS Fiduciary Services	Checking #0348	\$126,811.32			
		Total:			
		\$1,102,611.53			

	Receivership Defendants' Accounts						
Institution	Account Information	Current Value	Amount Transferred to Receiver's Account				
Wells Fargo	Checking (53 accounts in the names of the affiliates and affiliate entities included as Receivership Defendants)		\$190,184.131				
Wells Fargo	Checking (account in the names of Shaun Cohen and spouse)		\$23,065.432				
Byline Bank	Checking (2 accounts in names of Receivership Defendants)	\$21,828.733					
			Total:				
			\$213,249.56				

### **EquityBuild Real Estate Portfolio**

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

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

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

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

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

## Exhibit E

## Case: 1:18-cv-05587 Document #: 993-1 Filed: 05/17/21 Page 15 of 162 PageID #:32303

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

### Balances of Funds in Property Specific Accounts as of March 31, 2021

Account Number	Account Name	Account Balance	Date of Settlement	Reason for Change (if any)
Account Number	Account Name	(as of March 31, 2021)	Date of Settlement	1/1/21 - 3/31/21
0025	7301 S Stewart Ave	\$302,861.44	11/4/2019	Interest earned, \$186.63
0033	5001-05 S Drexel	\$2,721,000.26		Interest earned, \$1,676.80
0041	7927-49 S Essex	\$643,265.19		Interest earned, \$396.41
0058	8100-14 S Essex	\$927,170.97	4/30/2019	Interest earned, \$571.37
0066	6160-6212 S King	\$429,121.05	4/30/2019	Interest earned, \$264.45
0108	8047 S. Manistee	\$807,445.22	2/5/2020	Interest earned, \$497.59
0116	5955 S. Sacramento	\$449,263.82	11/5/2019	Interest earned, \$276.86
0124	6001-05 S. Sacramento	\$327,238.22	11/5/2019	Interest earned, \$201.66
0132	7026-42 S. Cornell	\$866,509.05	11/6/2019	Interest earned, \$533.99
0157	7834-44 S. Ellis	\$1,633,538.86	11/4/2019	Interest earned, \$1,006.67
0165	701-13 S. 5th Avenue	\$615,289.09	3/31/2020	Post-sale reconciliation from property manager,
				\$17,164.36; interest earned, \$376.94
0199	7625 S. East End	\$1,239,426.14	12/20/2019	Interest earned, \$763.79
0207	7635 S. East End	\$1,046,915.54	12/20/2019	Interest earned, \$645.16
0215	7748 S. Essex	\$1,184,336.53	12/18/2019	Post-sale reconciliation from property manager,
				\$14,481.68; interest earned, \$727.96
0223	7750 S. Muskegon	\$408,790.44	12/18/2019	Interest earned, \$251.92
0231	7749-59 S. Yates	\$647,943.19	4/22/2020	Interest earned, \$399.29
0249	7450 S. Luella	\$198,008.82		Post-sale reconciliation from property manager,
		, ,		\$11,750.90; interest earned, \$121.70
0256	4520-26 S. Drexel	\$6,217,870.43	5/21/2020	Post-sale reconciliation from property manager,
		, , , , ,	-, ,	\$330,371.07; transfer from Receiver's account for
				adjustment pursuant to Order (#843) on 2d
				restoration motion, \$59.50; interest earned,
				\$3,824.94
0264	6749-59 S. Merrill	\$1,407,374.84	4/28/2020	Post-sale reconciliation from property manager,
020.	07 13 33 31 Mem.	ψ2, 101,01 He 1	1, 20, 2020	\$8,274.78; transfer from Receiver's account for
				adjustment pursuant to Order (#843) on 2d
				restoration motion, \$24.75; interest earned,
				\$866.21
0272	7110 S. Cornell	\$1,167,921.10	8/13/2020	Post-sale reconciliation from property manager,
		, , , , ,	-, -, -	\$20,521.93; interest earned, \$719.17
0298	7600 S. Kingston	\$1,378,329.68	12/3/2020	Interest earned, \$849.39
0306	7656 S. Kingston	\$230,979.72		Interest earned, \$142.34
0314	8201 S. Kingston	\$279,376.36		Interest earned, \$172.17
0322	8326-58 S. Ellis	\$1,331,197.77		Post-sale reconciliation from property manager,
0022	0020 00 01 20	ψ 1/00 1/13 / · · · ·	0,11,2020	\$19,098.58; interest earned, \$817.86
0330	6949-59 S. Merrill	\$1,539,870.74	12/1/2020	Post-sale reconciliation from property manager,
0330	05 15 55 5. 141611111	ψ1,333,676.7 ·	12, 1, 2020	\$133,861.17; interest earned, \$887.52
0355	7546 S. Saginaw	\$522,247.73	5/13/2020	Post-sale reconciliation from property manager,
	75 10 5. 5ugmaw	Ψ322,217.73	3/13/2020	\$11,310.63; interest earned, \$320.37
0363	638 N. Avers	\$327,186.86	n/a	Payment of property management expenses,
5505	OUD IN. AVEIS	7527,100.00	ıı/a	(\$5,147.45); payment security installation
				(\$3,871.03); interest earned, \$204.28
0371	5450 S. Indiana	\$1,789,991.14	6/25/2020	Post-sale reconciliation from property manager,
	J-JU J. IIIulalla	1.14دو,ده۱,۱د	0/25/2020	\$138,819.42; interest earned, \$1,096.42
				\$138,813.42, Interest earned, \$1,030.42
0380	6437 S. Kenwood	\$1,340,583.69	6/25/2020	Post-sale reconciliation from property manager,
0389	0437 3. KEHWUUU	\$1,540,583.69	0/25/2020	\$22,524.97; interest earned, \$825.51
0207	7300 S. St. Lawrence	\$309,790.05	7/27/2020	Post-sale reconciliation from property manager,
0397	7 300 S. St. Lawrence	\$509,790.05	//2//2020	,
0405	7760 C. Colos	¢122.017.00	6/26/2020	\$26,057.96; interest earned, \$187.51
	7760 S. Coles	\$122,917.98	0/26/2020	Post-sale reconciliation from property manager,
0412	2000 C Justina	¢103.0FC.0C	6/26/2020	\$2,236.08; interest earned, \$75.46
0413	8000 S. Justine	\$193,056.86	6/26/2020	Post-sale reconciliation from property manager,
	0407.00 C. Elli-	\$440.040.1E	c lan laces	\$8,455.01; interest earned, \$117.87
0421	8107-09 S. Ellis	\$110,940.15	6/30/2020	Post-sale reconciliation from property manager,
	1			\$15,957.23; interest earned, \$66.29

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

### Balances of Funds in Property Specific Accounts as of March 31, 2021

Account Number	Account Name	Account Balance (as of March 31, 2021)	Date of Settlement	Reason for Change (if any) 1/1/21 - 3/31/21
0439	8209 S. Ellis	\$263,469.26	7/1/2020	Post-sale reconciliation from property manager, \$9,965.45; interest earned, \$161.07
0447	8214-16 S. Ingleside	\$208,388.36	6/30/2020	Post-sale reconciliation from property manager, \$3,567.54; interest earned, \$127.95
0454	11117 S. Longwood	\$1,690,656.27	7/8/2020	Post-sale reconciliation from property manager, \$100,524.91; interest earned, \$1,028.78
0462	1700 Juneway	\$2,770,064.72	10/20/2020	Post-sale reconciliation from property manager, \$139,047.30; interest earned, \$1,689.90
0470	1131-41 E. 79th	\$1,178,017.82	12/22/2020	Post-sale reconciliation from property manager, \$121,413.27; interest earned, \$656.11
0488	2736 W. 64th	\$379,736.07	9/29/2020	Post-sale reconciliation from property manager, \$4,555.74; utility refunds, \$1,586.77; interest earned, \$232.84
0496	3074 Cheltenham	\$1,013,455.80	9/24/2020	Interest earned, \$624.54
0504	5618 S. Martin Luther King	\$626,227.16	9/29/2020	Post-sale reconciliation from property manager, \$23,680.38; utility refunds, \$1,100.32; interest earned, \$382.61
0512	6250 S. Mozart	\$863,632.61	12/22/2020	Interest earned, \$532.21
0520	6355 S. Talman	\$478,578.06		Post-sale reconciliation from property manager, \$5,843.50; interest earned, \$294.16
0538	6356 S. California	\$315,213.89	9/29/2020	Post-sale reconciliation from property manager, \$2,259.54; utility refunds, \$8.59; interest earned, \$193.95
0546	6554-58 S. Vernon	\$529,273.55	10/15/2020	Interest earned, \$326.16
0553	7051 S. Bennett	\$483,425.75	9/23/2020	Interest earned, \$297.91
0561	7201 S. Constance	\$960,594.34	9/30/2020	Post-sale reconciliation from property manager, \$7,985.54; interest earned, \$590.85
0579	7201-07 S. Dorchester	\$420,874.77	10/20/2020	Post-sale reconciliation from property manager, \$3,779.88; utility refunds, \$56.26; interest earned, \$258.84
0587	7508 S. Essex	\$747,415.53	10/28/2020	Post-sale reconciliation from property manager, \$55,839.42; interest earned, \$460.98
0595	7957 S. Marquette	\$284,483.17	9/21/2020	Post-sale reconciliation from property manager, \$4,337.58; interest earned, \$174.75
0603	4533 S. Calumet	\$2,195,193.83	12/1/2020	Post-sale reconciliation from property manager, \$223,993.43; interest earned, \$1,256.15
0611	1017 W. 102nd	\$4,499.08	n/a	Interest earned, \$2.77
0629	1516 E. 85th	\$2,905.54		Interest earned, \$1.79
0637	417 Oglesby	\$370.19	n/a	Interest earned, \$0.23
0645	7922 S. Luella	\$200.79	n/a	Interest earned, \$0.12
0652	7925 S. Kingston	\$2,057.36	n/a	Interest earned, \$1.27
0660	8030 S. Marquette	\$1,414.99	n/a	Interest earned, \$0.88
0678	8104 S. Kingston	\$2,649.42	n/a	Interest earned, \$1.63
0686	8403 S. Aberdeen	\$2,356.04		Interest earned, \$1.46
0694	8405 S. Marquette	\$1,946.98		Interest earned, \$1.20
0702	8529 S. Rhodes	\$936.27		Interest earned, \$0.58
0710	9212 S. Parnell	\$2,463.27		Interest earned, \$1.51
0728	10012 S. LaSalle	\$2,026.17		Interest earned, \$1.25
0736	11318 S. Church	\$1,160.70		Interest earned, \$0.72
0744 0751	6554 S. Rhodes	\$1,087.40		Interest earned, \$0.67
0769	6825 S. Indiana 7210 S. Vernon	\$1,054.76 \$224.36		Interest earned, \$0.65 Interest earned, \$0.13
	1210 3. AGIIIOII	\$224.30	n/a	ווונבובא במוווכע, אָט.בא
0777	7712 S. Euclid	\$1,643.26	n/a	Interest earned, \$1.01

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

### Balances of Funds in Property Specific Accounts as of March 31, 2021

Account Number	Account Name	Account Balance	Date of Settlement	Reason for Change (if any)
		(as of March 31, 2021)		1/1/21 - 3/31/21
0793	8346 S. Constance	\$1,472.75	n/a	Interest earned, \$0.91
0801*	8432 S. Essex	\$393.76	n/a	Interest earned, \$0.24
0819	8517 S. Vernon	\$1,175.21	n/a	Interest earned, \$0.73
0827	2129 W. 71st	\$1,003.31	n/a	Interest earned, \$0.62
0835	9610 S. Woodlawn	\$2,331.96	n/a	Interest earned, \$1.44
0843	1401 W. 109th	\$2,370.21	n/a	Interest earned, \$1.47
0850	1139 E. 79th	\$3,708.33	n/a	Interest earned, \$2.29
0868	4611 S. Drexel	\$43,847.49	n/a	Interest earned, \$27.02
0876	6217 S. Dorchester	\$12,834.56	n/a	Interest earned, \$7.91
0884	7255 S. Euclid	\$26,442.00	n/a	Interest earned, \$16.29
0892	7024 S. Paxton	\$45,185.20	n/a	Interest earned, \$27.84
0900	4317 S. Michigan	\$792,299.47	12/2/2020	Interest earned, \$488.25
0918	7701 S. Essex	\$731,433.87	11/16/2020	Post-sale reconciliation from property manager,
				\$84,977.33; interest earned, \$427.47
0926	816 E. Marquette	\$821,461.36	11/18/2020	Post-sale reconciliation from property manager,
				\$68,419.42; interest earned, \$487.48
0934	1422 E. 68th	\$1,824.34	n/a	Interest earned, \$1.12
0942	2800 E. 81st	\$5,404.51	n/a	Interest earned, \$3.33
0959	4750 S. Indiana	\$13,141.16	n/a	Interest earned, \$8.10
0967	7840 S. Yates	\$8,769.49	n/a	Interest earned, \$5.40
0975	7442-48 S. Calumet	\$540,148.27	11/16/2020	Post-sale reconciliation from property manager,
				\$21,100.45; interest earned, \$327.08
0983	431 E. 42nd Place	\$65,485.33	11/5/2020	Insurance refund, \$6,046.58; interest earned,
				\$39.86
	TOTAL FUNDS HELD:	\$51,276,556.83		

# Exhibit F

# Case: 1:18-cv-05587 Document #: 993-1 Filed: 05/17/21 Page 19 of 162 PageID #:32307 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

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

May 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.6621130

Legal Fees for the period January 1-31, 2021 \$24,024.00

Expenses Disbursed \$0.00

Due this Invoice \$24,024.00

<u>Date</u>		<u>Indiv</u> <u>F</u>	<u>Hours</u>	Description
Asset Analysis	& Re	covery		
1/4/2	021	KBD	0.70	Telephone conference with SEC (.2); draft correspondence to K. Pritchard regarding investigation of potential asset (.5).
				Asset Analysis & Recovery
1/5/2	021	KBD	0.50	Exchange correspondence with K. Pritchard regarding communications relating to potential asset (.2); study draft notice letters and review subpoenas (.3).
				Asset Analysis & Recovery
1/7/2	021	KBD	0.60	Exchange correspondence with K. Pritchard regarding subpoena.
				Asset Analysis & Recovery
1/8/2	021	KBD	0.20	Exchange correspondence with K. Pritchard regarding subpoena.
				Asset Analysis & Recovery
1/14/	2021	KBD	0.50	Work on potential claims for unclaimed property.
				Asset Analysis & Recovery
1/15/	2021	KBD	0.20	Telephone conference with government representative.
				Asset Analysis & Recovery
1/19/	2021	KBD	0.90	Telephone conference with government representatives.
				Asset Analysis & Recovery
SUBTOTAL:				
Asset Disposit	ion			[ 3.00 1404.00]
1/3/2		KBD	0.20	Review draft eleventh motion to confirm property sale (7237-43 S Bennett Avenue) and review related correspondence.
				Asset Disposition
1/4/2	021	KBD	0.90	Study and revise response to objection to 11th sales motion (7237-43 S Bennett Avenue) and exchange various correspondence regarding same (.6); exchange correspondence with J. Rak regarding status of property sales (.3).

Date Indiv Hours Description

#### **Asset Disposition**

1/6/2021 KBD 0

0.40 Telephone conference with real estate broker regarding disposition of assets (638-40 N Avers Avenue; 7109-19 S Calumet Avenue) (.2); exchange correspondence with A. Porter regarding tenth motion to approve sales and timing for ruling (.1); draft correspondence to A. Porter regarding sale of single family residence portfolio (single family) (.1).

**Asset Disposition** 

1/7/2021 KBD

0.20 Exchange correspondence regarding inquiry from prospective buyer relating to property management issue.

Asset Disposition

1/11/2021 KBD

0.60 Confer with J. Wine regarding post-sale account reconciliation and transfers of funds from property managers to separate accounts (7450 S Luella Avenue; 7508 S Essex Avenue; 4520-26 S Drexel Boulevard; 5450-52 S Indiana Avenue; 6437-41 S Kenwood Avenue; 7110 S Cornell Avenue; 3074 E Cheltenham Place) (.2); study final reports from property manager (7450 S Luella Avenue; 7508 S Essex Avenue; 4520-26 S Drexel Boulevard;5450-52 S Indiana Avenue; 6437-41 S Kenwood Avenue; 7110 S Cornell Avenue; 3074 E Cheltenham Place) (.4).

**Asset Disposition** 

1/13/2021 KBD

1.00 Exchange correspondence with J. Rak regarding post-sale reconciliation for properties (7748-52 S Essex Avenue; 701-13 5th Avenue; 6749-59 S Merrill Avenue; 7546-48 S Saginaw Avenue; 8326-58 S Ellis Avenue; 7760 S Coles Avenue; 8000-02 S Justine Street; 8107-09 S Ellis Avenue; 8214-16 S Ingleside Avenue; 8209 S Kingston Avenue; 11117-11119 S Longwood Avenue; 7300-04 S St Lawrence Avenue; 7957-59 S Marquette Road; 2736-44 W 64th Street; 6356 S California Avenue; 6355-59 S Talman Avenue; 5618-20 S Martin Luther King Avenue; 7201 S Constance Avenue; 6554-58 S Vernon Avenue; 1700-08 W Juneway Terrace; 7201-07 S Dorchester Avenue) (.6); exchange correspondence with real estate broker and A. Porter regarding single family portfolio questions (single family) (.4).

**Asset Disposition** 

1/14/2021 KBD

0.50 Exchange correspondence with real estate broker regarding information about offers and planning for review (single family) (.2); exchange correspondence with J. Rak and K. Pritchard regarding post-sale reconciliation for properties (7748-52 S Essex Avenue; 701-13 5th Avenue; 6749-59 S Merrill Avenue; 7546-48 S Saginaw Avenue; 8326-58 S Ellis Avenue; 7760 S Coles Avenue; 8000-02 S Justine Street; 8107-09 S Ellis Avenue; 8214-16 S Ingleside Avenue; 8209 S Kingston Avenue; 11117-11119 S Longwood Avenue; 7300-04 S St Lawrence Avenue; 7957-59 S Marquette Road; 2736-44 W 64th Street; 6356 S California Avenue; 6355-59 S Talman Avenue; 5618-20 S Martin Luther King Avenue; 7201 S Constance Avenue; 6554-58 S Vernon Avenue; 1700-08 W Juneway Terrace; 7201-07 S Dorchester Avenue) (.3).

Date Indiv Hours Description

#### Asset Disposition

1/15/2021 KBD

0.40 Exchange correspondence with real estate broker regarding due diligence information for single family residence portfolio (single family) and exchange correspondence with J. Rak regarding same (.2); study correspondence regarding offers for single family residence portfolios (single family) (.2).

**Asset Disposition** 

1/18/2021 KBD

1.40 Confer with real estate broker and counsel regarding offers on sale of single family residence portfolio (single family) (.9); study offers and summary (single family) (.4); exchange correspondence with A. Porter and J. Rak regarding timing considerations relating to property sale (1102 Bingham (Houston, TX)) (.1).

**Asset Disposition** 

1/20/2021 KBD

0.20 Exchange correspondence with J. Rak regarding earnest money deposit (1102 Bingham (Houston, TX)) (.1); attention to offers for single family residence portfolio (single family) (.1).

**Asset Disposition** 

1/21/2021 KBD

2.40 Telephone conference with real estate broker and counsel regarding sale of single family residence properties (single family) (.6); follow up call regarding sale of single family residence properties with M. Rachlis, A. Porter, and asset manager (single family) (.4); telephone conference with lenders' counsel, real estate broker, M. Rachlis, and A. Porter regarding sale process, offers, and related issues (single family) (.4); telephone conference and exchange correspondence with real estate broker regarding sale process and offers (single family) (.2); exchange correspondence with A. Porter and M. Rachlis regarding sale process issues and offers (single family) (.1); exchange correspondence K. Pritchard and J. Rak regarding post-sale account reconciliations (1700-08 W Juneway Terrace; 7300-04 S St Lawrence Avenue; 7760 S Coles Avenue; 701-13 S 5th Avenue; 8000-02 S Justine Street; 8107-09 S Ellis Avenue; 8209 S Ellis Avenue; 8214-16 S Ingleside Avenue; 6749-59 S Merrill Avenue; 7201 S Constance Avenue; 2736-44 W 64th Street; 6356 S California Avenue; 6355-59 S Talman Avenue: 7201-07 S Dorchester Avenue: 7546-48 S Saginaw Avenue: 7748-52 S Essex Avenue; 7957-59 S Marquette Road; 8326-58 S Ellis Avenue; 11117-11119 S Longwood Drive; 5618-20 S Martin Luther King Drive) (.4); exchange correspondence relating to notice of criminal activity relating to sold property (6949-59 S Merrill Avenue) (.2); exchange correspondence relating to collection notice for property (6250 S Mozart Street) (.1).

Asset Disposition

1/22/2021 KBD

0.50 Telephone conference with real estate broker regarding negotiation with potential buyer (single family) (.2); telephone conference with and draft correspondence to claimant's counsel regarding offers

<u>Date</u>	Indiv	Hours	Description
			and negotiations (single family) (.1); exchange correspondence with A. Porter and M. Rachlis regarding sale negotiations (single family) (.2).
			Asset Disposition
1/25/2021	KBD	0.20	Exchange correspondence with real estate broker regarding communication with lender's counsel and change of potential buyer's interests (single family).
			Asset Disposition
1/27/2021	KBD	0.20	Exchange correspondence regarding sale of single family portfolio (single family) and revisions to contract.
			Asset Disposition
1/28/2021	KBD	0.20	Draft correspondence to A. Porter regarding sale of property and communication with broker (1102 Bingham (Houston, TX)) (.1); attention to releases of judgments (4611-17 S Drexel Boulevard; 7024-32 S Paxton Avenue) (.1).
			Asset Disposition
1/29/2021	KBD	0.60	Review and execute sales agreement for single family residence portfolio (single family) (.2); exchange correspondence with broker regarding inspections (single family) (.1); exchange correspondence with A. Porter regarding communication from buyer relating to sale and inspection (single family) (.2); exchange correspondence with A. Porter regarding communication from buyer (1102 Bingham (Houston, TX)) (.1).
			Asset Disposition
SUBTOTAL:			[ 9.90 3861.00]
Business Operations	S	_	
1/4/2021	KBD	0.20	Exchange correspondence with E. Duff regarding fund restoration.
			Business Operations
1/8/2021	KBD	0.20	Exchange correspondence regarding checks from title company relating to property (431 E 42nd Place).
			Business Operations
1/11/2021	KBD	1.50	Exchange correspondence regarding order on motion to use sale proceeds (7749-59 S Yates Boulevard; 8201 S Kingston Avenue; 8047-55 S Manistee Avenue; 7051 S Bennett Avenue; 431 E 42nd Place; 4520-26 S Drexel Boulevard) (.2); study property manager financial reports (.4); study other property manager's financial reports (.4); gather and prepare information regarding property expenses and exchange related correspondence with E. Duff (638-40 N Avers Avenue) (.2); attention to payment of property and general liability insurance (.3).

Date	<u>Indiv</u>	Hours	Description
			Business Operations
1/12/2021	KBD	0.20	Attention to security service at property (7237-43 S Bennett Avenue).
			Business Operations
1/14/2021	KBD	0.20	Exchange correspondence with property manager regarding security service at property (7237-43 S Bennett Avenue).
			Business Operations
1/15/2021	KBD	0.20	Exchange correspondence with property manager regarding utility refunds.
			Business Operations
1/18/2021	KBD	0.20	Exchange correspondence with E. Duff regarding restoration of funds relating to property expenses.
			Business Operations
1/19/2021	KBD	0.50	Study analysis of accounting reports (4520-26 S Drexel Boulevard; 6749-59 S Merrill Avenue) (.2); attention to transfer of funds for property security (7237 S Bennett Avenue) (.3).
			Business Operations
1/20/2021	KBD	0.20	Exchange correspondence with adjuster regarding settlement fee (4520-26 S Drexel Boulevard) and status for court approval.
			Business Operations
1/22/2021	KBD	0.20	Exchange correspondence with E. Duff regarding utility refunds (5618-20 S Martin Luther King Drive; 2736-44 W 64th Street).
			Business Operations
1/27/2021	KBD	0.40	Attention to administrative orders for properties and exchange correspondence relating to same (7600-10 S Kingston Avenue; 5618-20 S Martin Luther King Drive; 7109-19 S Calumet Avenue; 7656-58 S Kingston Avenue; 6554-58 S Vernon Avenue) (.2); attention to administrative hearing and property inspection matters (6217-27 S Dorchester Avenue; 1414-18 East 62nd Place) (.2).
			Business Operations
1/28/2021	KBD	0.20	Exchange correspondence regarding housing court cases (7024-32 S Paxton Avenue; 7109-19 S Calumet Avenue) (.1); exchange correspondence regarding roof lease (6250 S Mozart Street) (.1).
			Business Operations

#### Claims Administration & Objections

1/5/2021

1/6/2021

1/7/2021

**KBD** 

1/4/2021 KBD 0.70 Study claims outline and related correspondence and revisions from J. Wine and M. Rachlis (.6); attention to communication with claimant regarding claims process (.1).

Claims Administration & Objections

KBD 2.30 Exchange correspondence regarding communications with claimants and counsel regarding claims process and documentation (.5); study and revise claims process outline and exchange correspondence with M. Rachlis and J. Wine relating to same (1.8).

Claims Administration & Objections

3.40 Work on claims review and claims process (1.5); draft and revise outline of issuesfor claims review process and draft related correspondence to A. Porter (.5); study and revise draft communication to claimants regarding confidentiality order and claims process order (1.1); study correspondence from claimant regarding claims documentation and exchange correspondence with A. Watychowicz relating to same (.2); attention to request from claimant for information relating to property sales (.1).

Claims Administration & Objections

KBD 2.50 Study and revise communication to claimants regarding confidentiality order and claims process and review various correspondence relating to same (.6); confer with M. Rachlis and J. Wine regarding claims process (1.9).

Claims Administration & Objections

1/8/2021 KBD 3.70 Prepare for call with lender and counsel regarding property (638-40 N Avers Avenue) (.2); telephone conference with claimant and counsel regarding property (638-40 N Avers Avenue), estimated closing costs, and various related issues (.5); reviewfollow up request for information from claimant's counsel and attention to same (638-40 N Avers Avenue) (.1); telephone conference with SEC (.2); work on claims process and claims review (2.7).

Claims Administration & Objections

1/10/2021 KBD 0.20 Exchange correspondence with A. Porter and accounting firm representative regarding collection notice and claim with respect to property (1516 E 85th Place).

Date	Indiv	Hours	Description
			Claims Administration & Objections
1/11/2021	KBD	1.50	Claims Administration & Objections  Confer with A. Porter regarding claims analysis and investigation issues (.3); confer with M. Rachlis regarding same and potential resolution of
			issues relating to claimsprocess and claims (.4); gather information at claimant's counsel's request and draft correspondence regarding same (.5); telephone conference with accounting firm representative regarding collection notice (1516 E 85th Place Associates) (.3).
			Claims Administration & Objections
1/12/2021	KBD	0.70	Study analysis of claims and exchange correspondence with J. Wine regarding same (.3); work to gather information at claimant's request, including exchange correspondence regarding same, and draft correspondence regarding same (638-40 N Avers Avenue) (.4).
			Claims Administration & Objections
1/13/2021	KBD	0.70	Review and revise claims vendor statement of work and exchange correspondence with J. Wine regarding same (.3); work to gather information at claimant's request regarding insurance (638-40 N Avers Avenue) (.3); review information regarding claimant's claims (7442-54 S Calumet Avenue; 7600-10 S Kingston Avenue; 8326-32 S Ellis Avenue; CCF2) (.1).
			Claims Administration & Objections
1/14/2021	KBD	1.30	Telephone conference with J. Wine regarding relating to property (7110 S Cornell Avenue) (.2); prepare for call with claimant (.3); telephone conference with claimant regarding claims and claim process (.8).
			Claims Administration & Objections
1/15/2021	KBD	3.50	Work on claims process (1.7); confer with M. Rachlis and J. Wine regarding claims process (1.0); exchange correspondence with insurance broker regarding information for claimant (638-40 N Avers Avenue) (.2); study correspondence from J. Wine regarding EB documents document database (.3); further review claims vendor statement of work and exchange related correspondence with J. Wine and M. Rachlis (.3).
			Claims Administration & Objections
1/17/2021	KBD	2.10	Work on claims process (2.0); exchange correspondence with A. Watychowicz regarding response to claimant relating to claim (.1).
			Claims Administration & Objections
1/18/2021	KBD	0.60	Attention to communication with claimant regarding claimant estate issue (.1); work on claimant request for information regarding claim status (.2); exchange correspondence with A. Watychowicz regarding

#### Date Indiv Hours Description

statement of work for vendor claims project (.1); exchange correspondence with J. Wine regarding agreement with vendor relating to claims forms and documentation (.2).

Claims Administration & Objections

#### 1/19/2021 KBD

1.90 Work on communication with claimant regarding documentation relating to claim, decedent's estate, and dissolved entity (.3); attention to review of claims (1700-08 W Juneway Terrace; 5450-52 S Indiana Avenue, 7749-59 S Yates Boulevard; 6160-6212 S Martin Luther King Drive) (.2); telephone conference with insurance adjuster and exchange correspondence with insurance broker regarding insurance claim and deductible confirmation (638-40 N Avers Avenue) (.2); draft correspondence to lender's counsel to provide requested information relating to insurance claim and estimated closing costs (638-40 NAvers Avenue) (.3); exchange correspondence with J. Wine regarding claims documents project (.1); work on standard written discovery for claimants (.3); evaluate claims related activities and review correspondence from J. Wine regarding same (.2); study revisions to claims resolution process (.3).

Claims Administration & Objections

#### 1/20/2021 KBD

4.50 Work with M. Rachlis and J. Wine on claims process outline and standard written discovery requests (3.1); study multiple revisions to same and further telephone conferences and exchange correspondence with J. Wine and M. Rachlis regarding claims process outline and standard written discovery requests (1.1); work on response to claimants regarding claims communications (.2); exchange correspondence with A. Watychowicz regarding revision to and approval of statement of work for claims vendor (.1).

Claims Administration & Objections

#### 1/21/2021 KBD

3.00 Work on claims process outline and standard discovery (2.7); work on correspondence to claimant's counsel regarding property and related expenses (638-40 N Avers Avenue) (.2); attention to claims in first tranche (3074 E Cheltenham Place; 7201 S Constance Avenue; 7625-33 S East End Avenue; 7635-43 S East End Avenue; 7750-58 S Muskegon Avenue) (.1).

Claims Administration & Objections

#### 1/22/2021 KBD

3.70 Telephone conference with claimant's counsel regarding claims process (.3); investigation relating to claims in first tranche (3074 E Cheltenham Place; 7201 S Constance Avenue; 7625-33 S East End Avenue; 7635-43 S East End Avenue; 7750-58 S Muskegon Avenue) (.4); work on joint status report and numerous communications with J. Wine and M. Rachlis regarding same (2.4); exchange further correspondence relating to collection notice for property (6250 S Mozart Street) (.1); exchange correspondence relating to property and claims submission communication (638-40 N Avers Avenue) (.2); attention to documents for EB database (.3).

Claims Administration & Objections

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

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1/24/2021	KBD 0.2	O Attention to communication with claimant regarding claims process and timing and exchange correspondence with A. Watychowicz relating to same (.1); exchange correspondence with E. Duff regarding communication with lenders' counsel relating to accounting reports (.1).  Claims Administration & Objections
		Claims Administration & Objections
1/26/2021	KBD 0.3	0 Work on responses to claimants' inquiries (.2); exchange correspondence with A. Watychowicz regarding information relating to claimants (.1).
		Claims Administration & Objections
1/27/2021	KBD 0.6	0 Work on issues relating to first tranche (3074 E Cheltenham Place; 7201 S Constance Avenue; 7625-33 S East End Avenue; 7635-43 S East End Avenue; 7750-58 S Muskegon Avenue) (.2); work on correspondence with claimants (11117-11119 S Longwood Drive; 638-40 N Avers Avenue) (.2); attention issues relating to documents for EB database (.1); exchange correspondence with J. Wine regarding confidentiality order (.1).
		Claims Administration & Objections
1/28/2021	KBD 0.7	O Draft correspondence to counsel for claimants regarding requestfor documents (.2); exchange correspondence regarding potential claim (638-40 N Avers Avenue) (.1); exchange correspondence with claimant's counsel regarding insurance information regarding property (638-40 N Avers Avenue) (.1); attention to revision to claims process order (.1); work on response to claimant (.1); study correspondence from J. Porter regarding reconciliation of records(.1).
		Claims Administration & Objections
1/29/2021	KBD 2.9	O Confer with M. Rachlis and J. Wine regarding claims process and preparation for hearing before Judge Lee (1.0); confer with SEC (.3); appear for hearing beforeJudge Lee regarding claims process (1.4); review correspondence fromclaimant's counsel regarding claim amount (.1); exchange correspondence regarding communication with claimant about hearing before Judge Lee (.1).
		Claims Administration & Objections
CLIDTOTAL:		[44.00 45000.00]
SUBTOTAL:		[41.00 15990.00]

<u>Date</u> In	ndiv Hou	urs De	escription		
Status Reports		•			
1/13/2021	KBD	0.40	Study draft status report.		
			Status Reports		
1/19/2021	KBD	0.40	Study draft status report.		
			Status Reports		
1/25/2021	KBD		Review and revise draft status report, review further revisic correspondence relating to same.	ons, and	exchange
			Status Reports		
1/26/2021	KBD	0.60	Work on revisions to draft status report.		
			Status Reports		
1/27/2021	KBD	0.20	Review and work on revisions to status report.		
			Status Reports		
1/28/2021	KBD	0.20	Review revised status report.		
			Status Reports		
SUBTOTAL:			[ 2	2.70	1053.00]
Tax Issues					
1/25/2021	KBD		Exchange correspondence with accounting firm representation potential tax issue.	ative rega	arding
			Tax Issues		
SUBTOTAL:			0 ]	).20	78.00]
			61	.60	\$24,024.00
			Summary of Activity		
Kevin B. Duff			Hours 61.60 3	Rate 390.00	\$24,024.00

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### **SUMMARY**

TOTAL DUE	\$24,024.00		
Other Charges	\$0.00		
Legal Services	\$24,024.00		

# Case: 1:18-cv-05587 Document #: 993-1 Filed: 05/17/21 Page 31 of 162 PageID #:32319 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

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

May 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.6621131

Legal Fees for the period February 1-28, 2021 \$12,246.00 **Expenses Disbursed** \$0.00 **Due this Invoice** \$12,246.00

<u>Date</u>	<u>Indiv</u> H	<u>lours</u>	Description
Asset Analysis & Re	covery		
2/4/2021	KBD	0.90	Exchange correspondence regarding potential asset and study related information.
			Asset Analysis & Recovery
2/9/2021	KBD	0.40	Telephone conference and exchange correspondence with A. Porter regarding potential assets.
			Asset Analysis & Recovery
2/18/2021	KBD	0.20	Telephone conference with government representative.
			Asset Analysis & Recovery
2/19/2021	KBD	0.20	Exchange correspondence with government representative.
			Asset Analysis & Recovery
2/26/2021	KBD	1.30	Work on response to potential asset holder regarding potential asset (1.0); review and revise rider to subpoena (.3).
			Asset Analysis & Recovery
2/28/2021	KBD	3.30	Draft correspondence regarding potential asset.
			Asset Analysis & Recovery
SUBTOTAL:			[ 6.30 2457.00]
Asset Disposition		-	
2/3/2021	KBD	0.30	Confer with A. Porter regarding sale of property, communications with buyer, and submission of documents to city (1102 Bingham (Houston, TX)) (.1); study correspondence from broker regarding communication with buyer regarding terms (single family) (.1); exchange correspondence with J. Rak regarding accounts for single family properties (single family) (.1).
			Asset Disposition
2/4/2021	KBD	0.20	Exchange correspondence with A. Porter regarding proposed rider to PSA (single family).
			Asset Disposition
2/5/2021	KBD	0.50	Review correspondence from lender's counsel regarding termination of purchase and sale agreement, declination of credit bid, andrelated telephone conference with real estate broker (638-40 N Avers

Date	Indiv	Hours	Description
			Avenue) (.2); attention to negotiation with buyer of single family portfolio (single family) (.3).
			Asset Disposition
2/6/2021	KBD	0.20	Study correspondence from A. Porter regarding negotiation with buyer of single family portfolio (single family).
			Asset Disposition
2/7/2021	KBD	0.20	Exchange correspondence with A. Porter regarding termination of purchase and sale agreement, declination of credit bid, and plans to sell property (638-40 N Avers Avenue).
			Asset Disposition
2/8/2021	KBD	0.80	Exchange correspondence regarding resolving due diligence issue with single family residence portfolio sale and related conference with A. Porter and real estate broker (single family) (.6); confer with A. Porter andreal estate broker regarding plan for sale of property (638-40 N Avers Avenue) (.2).
			Asset Disposition
2/9/2021	KBD	0.70	Telephone conference with A. Porter regarding single family residence portfolio negotiations with buyer and exchange additional correspondence (single family) (.5); attention to post-sale account reconciliation (816-22 E Marquette Road; 7442-54 S Calumet Avenue; 7701-03 S Essex Avenue) (.1); exchange correspondence with real estate broker regarding property showing (638-40 N Avers Avenue) (.1).
			Asset Disposition
2/10/2021	KBD	0.30	Exchange correspondence with A. Porter and real estate broker regarding revisions to purchase and sale agreement and related communications with purchaser's counsel (single family).
			Asset Disposition
2/12/2021	KBD	0.30	Telephone conference and exchange correspondence with A. Porter and broker regarding negotiation with purchaser (single family) (.2); study correspondence from real estate broker and A. Porter regarding marketing effort and planning (638-40 N Avers Avenue) (.1).
			Asset Disposition
2/16/2021	KBD	0.20	Exchange correspondence with A. Porter and real estate broker regarding purchase and sale agreement changes (single family) (.1); exchange correspondence with claimant's counsel regarding sale status and real estate taxes (4611-17 S Drexel Boulevard; 6217-27 S Dorchester Avenue; 7255-57 S Euclid Avenue; 638-40 N Avers Avenue) (.1).
			Asset Disposition

Date	Indiv	Hours	Description
2/17/2021	KBD	0.20	Exchange correspondence with A. Porter regarding execution of purchase and sale agreement (single family) (.1); exchange correspondence with purchaser regarding timing for ruling on motion to approve sale (4611-17 S Drexel Boulevard) (.1).
			Asset Disposition
2/18/2021	KBD	0.10	Exchange correspondence with A. Porter regarding efforts to advance sale of property (1102 Bingham (Houston, TX)).
			Asset Disposition
2/23/2021	KBD	0.20	Exchange correspondence regarding sale and inspections (single family) (.1); attention to joint order escrow instructions (single family) (.1).
			Asset Disposition
2/24/2021	KBD	0.20	Attention to wire of earnest money and communications with purchaser and broker (single family).
			Asset Disposition
2/25/2021	KBD	0.20	Exchange correspondence with A. Porter regarding communication with buyer relating to Houston review and documentation (1102 Bingham (Houston, TX)).
			Asset Disposition
2/26/2021	KBD	0.20	Telephone conference with real estate broker regarding efforts to show and sell property (638-40 N Avers Avenue).
			Asset Disposition
SUBTOTAL:			[ 4.80 1872.00]
Business Operations	3	_	
2/1/2021	KBD	0.20	Exchange correspondence with property manager and J. Wine regarding motion to approve payment of expenses.
			Business Operations
2/2/2021	KBD	0.30	Exchange correspondence regarding real estate tax planning (.2); attention to communication from property manager regarding property expenses (638-40 N Avers Avenue; 1401 W 109th Place) (.1).
			Business Operations
2/3/2021	KBD	0.40	Confer with A. Porter regarding property management issues (7237-43 S Bennett Avenue; 7109-19 S Calumet Avenue) (.3); exchange correspondence with J. Wine regarding collection notice and judgment (6250 S Mozart Street) (.1).

Date Indiv Hours Description **Business Operations KBD** 2/6/2021 0.10 Attention to payment of fines (7024-32 S Paxton Avenue). **Business Operations** 2/8/2021 **KBD** 0.90 Attention to property security (7237-43 S Bennett Avenue) (.1); exchange correspondence with J. Rak regarding property real estate taxes planning (.2); attention to water bill payment for property (5618-20 S Martin Luther King Drive) (.1): study property manager financial reporting and draft related correspondence to asset manager and K. Pritchard (6250 S Mozart Street; 9610 S Woodlawn Avenue; 638-40 N Avers Avenue; 7109-19 S Calumet Avenue; 7237-43 S Bennett Avenue; 1401 W 109th Place; 310 E 50th Street; 6807 S Indiana Avenue; 7255-57 S Euclid Avenue; 4315-19 S Michigan Avenue: 7600-10 S Kingston Avenue: 7656-58 S Kingston Avenue: 6554-58 S Vernon Avenue) (.5). **Business Operations** 2/9/2021 **KBD** 0.20 Review expenses for property (1401 W 109th Place) (.1); attention to expense for property security (7237-43 S Bennett Avenue) (.1). **Business Operations** 2/10/2021 KBD 0.50 Attention to property expense issue (1700-08 W Juneway Terrace) (.1); study property manager financial reporting (7051 S Bennett Avenue: 8201 S Kingston Avenue; 8047-55 S Manistee Avenue; 4611-17 S Drexel Boulevard; 7749-59 S Yates Boulevard; 1131-41 E 79th Place; 4533-47 S Calumet Avenue: 6217-27 S Dorchester Avenue: 1414-18 East 62nd Place: 6949-59 S Merrill Avenue; 7024-32 S Paxton Avenue; 1414-18 East 62nd Place; 1017 W 102nd Street; 1516 E 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; 8403S 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; 5437 S Laflin Street; 6759 S Indiana Avenue) (.4). **Business Operations** 2/11/2021 KBD 0.20 Attention to expense issues and communications with property manager (1414-18 East 62nd Place) (.1); exchange correspondence with J. Wine regarding property manager financial reporting (.1). **Business Operations** 

0.10 Telephone conference with A. Porter regarding property management

transition (7109-19 S Calumet Avenue).

2/12/2021 KBD

Date Indiv Hours Description

#### **Business Operations**

2/15/2021 KBD

0.60 Attention to transition of property management services (7109-19 S Calumet Avenue) (.1): exchange correspondence with J. Rak regarding property tax balances and study information (.2); study additional property manager financial reporting (7051 S Bennett Avenue; 8201 S Kingston Avenue; 8047-55 S Manistee Avenue; 4611-17 S Drexel Boulevard; 7749-59 S Yates Boulevard; 1131-41 E 79th Place; 4533-47 S Calumet Avenue; 6217-27 S Dorchester Avenue; 1414-18 East 62nd Place; 6949-59 S Merrill Avenue; 7024-32 S Paxton Avenue: 1414-18 East 62nd Place: 1017 W 102nd Street: 1516 E 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; 5437 S Laflin Street; 6759 S Indiana Avenue) (.3).

**Business Operations** 

2/16/2021 KBD

0.40 Exchange correspondence with K. Pritchard and bank representative regarding property expenses (638-40 N Avers Avenue; 1401 W 109th Place; 7237-43 S Bennett Avenue) (.3); exchange correspondence with K. Pritchard regarding property management records (7109-19 S Calumet Avenue) (.1).

**Business Operations** 

2/17/2021 KBD

0.30 Exchange correspondence with J. Wine regarding release of lien (4611-17 S Drexel Boulevard) (.1); exchange correspondence with J. Wine regarding property repair and inspection issue (6217-27 S Dorchester Avenue) (.1); exchange correspondence with property manager (WPD) regarding transition of property management (7109-19 S Calumet Avenue) (.1).

**Business Operations** 

2/22/2021 KBD

0.10 Exchange correspondence with J. Wine regarding City collection notice (6250 S Mozart Street).

**Business Operations** 

2/23/2021 KBD

0.30 Exchange correspondence with A. Porter and J. Rak regarding sale and notice of tax lien (1102 Bingham (Houston, TX)).

**Business Operations** 

	Date In	ndiv Ho	urs De	escription		
	2/26/2021	KBD	0.10	Work on utility refund issues.		
				Business Operations		
SUBTOT	AL:				[ 4.70	1833.00]
Case Adı	ministration		-			
	2/8/2021	KBD	0.10	Exchange correspondence with J. Wine regarding tax	administrato	r invoices.
				Case Administration		
SUBTOT	AL:				[ 0.10	39.00]
Claims A	dministratio	n & Obj	<u>ection</u>	<u>s</u>		
	2/1/2021	KBD	0.90	Exchange correspondence with insurance broker regardeductible inquiry and draft correspondence to claimal same (638-40 N Avers Avenue) (.2); work on response exchange correspondence with J. Wine regarding con opt-outs (.1); study proposed tranche groupings and recorrespondence (.3); study revised claims process out	nt's counsel reto claimants fidentiality or elated	relating to s (.1);
	2/2/2021	KBD	0.80	Claims Administration & Objections  Exchange correspondence regarding claimants' cor	mmunications	s about
				claims process.  Claims Administration & Objections		
	2/3/2021	KBD	0.90	Confer with A. Porter regarding credit bid and letter of S Calumet Avenue; 638-40 N Avers Avenue) (.1); stude process outline and exchange correspondence with J. regarding changes (.4); work on responses to claiman	ly and revise Wine and M	claims
				Claims Administration & Objections		
	2/4/2021	KBD	1.70	Work on claims process outline and grouping of prope and exchange various correspondence relating to proc responses to claimants (.2).		
				Claims Administration & Objections		
	2/5/2021	KBD	0.80	Work on claims process outline and exchange various correspondence (.6); review proposed grouping of pro		
				Claims Administration & Objections		

Date	Indiv	Hours	Description
2/8/2021	KBD	0.20	Attention to claimants' counsel's request for records (.1);exchange correspondence regarding hearing before Judge Lee (.1).
			Claims Administration & Objections
2/9/2021	KBD	0.60	Work on communications with claimants regarding claims process (.5); attention to execution of vendor agreement and order approving engagement (.1).
			Claims Administration & Objections
2/10/2021	KBD	1.80	Telephone conference with claimants' counsel, M. Rachlis, and J.Wine regarding claims and various related procedural issues (.8); follow up conversation with M. Rachlis and J. Wine relating to claimants' request for records (.3); work on responses to numerous claimant inquiries regarding claims process (.3); work on investigation of records regarding claims issue (.2); attention to hard drive for claims vendor (.2).
			Claims Administration & Objections
2/11/2021	KBD	0.70	Work on responses to claimant inquiries regarding claims process (.2); work on single claims process and timing (.3); attention to action items with claims vendor (.2).
			Claims Administration & Objections
2/12/2021	KBD	2.10	Work on responses to numerous claimant inquiries regarding claims process (.3); work on single claims process and timing (.3); confer with J. Wine and M. Rachlis regarding claims review and claims distribution (1.0); confer with J. Wine and M. Rachlis regarding single claim process (.5).
			Claims Administration & Objections
2/15/2021	KBD	0.40	Work on responses to claimants regarding claims and claims process.
			Claims Administration & Objections
2/16/2021	KBD	0.40	Exchange correspondence with lenders' counsel regarding real estate taxes (4611-17 S Drexel Boulevard; 7255-57 S Euclid Avenue; 638-40 N Avers Avenue; single family) (.2); exchange correspondence with J. Wine regarding process for single claim properties and study compiled information (.2).
			Claims Administration & Objections
2/17/2021	KBD	0.50	Attention to communication from claimants (.2); exchange correspondence with J. Wine regarding claims vendors, contracts, logistics, and related issues (.3).

<u>Date</u>	Indiv	Hours	Description
			Claims Administration & Objections
2/18/2021	KBD	0.20	Study hearing transcript and exchange correspondence with J. Wine regarding expert discovery.
			Claims Administration & Objections
2/19/2021	KBD	0.20	Attention to claimant communication.
			Claims Administration & Objections
2/22/2021	KBD	0.10	Attention to claimant inquiry regarding confidentiality agreement.
			Claims Administration & Objections
2/23/2021	KBD	0.10	Exchange correspondence with J. Wine regarding notice of opt-outs.
			Claims Administration & Objections
2/24/2021	KBD	1.40	Work with J. Wine on process for single claim, distribution of claims documentation, and unrecorded secured interest properties and treatment of claimed interest (.5); analysis of interest payment issue relating to all claimants (.4); exchange correspondence with J. Wine regarding notice of opt-outs (.1); work on response to claimants (.4).
			Claims Administration & Objections
2/25/2021	KBD	1.30	Work with J. Wine and M. Rachlis regarding logistics for distribution of claims documentation (.7); study and revise notice and correspondence to claimants regarding opt-outs and claims documentation (.3); exchange correspondence regarding inventory of EB documents (.2); attention to claimant communications (.1).
			Claims Administration & Objections
2/26/2021	KBD	0.10	Attention to claimant communication.
			Claims Administration & Objections
SUBTOTAL:			[15.20 5928.00]
Status Reports			
2/1/2021	KBD	0.30	Exchange correspondence with J. Wine regarding status report.
			Status Reports
SUBTOTAL:			[ 0.30 117.00]

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Hours 31.40 \$12,246.00

Summary of Activity

Hours Rate

Kevin B. Duff 31.40 390.00 \$12,246.00

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### **SUMMARY**

Legal Services Other Charges	\$12,246.00 \$0.00
TOTAL DUE	\$12,246.00 

# Case: 1:18-cv-05587 Document #: 993-1 Filed: 05/17/21 Page 42 of 162 PageID #:32330 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

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

May 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.6621132

Legal Fees for the period March 1-31, 2021 \$16,302.00

Expenses Disbursed \$0.00

Due this Invoice \$16,302.00

	Date	Indiv H	ours	Description
Asset Ar	nalysis & Re	covery		
	3/1/2021	KBD	1.50	Revise correspondence to potential asset holder and exchange correspondence with M. Rachlis and K. Pritchard regarding potential asset.
				Asset Analysis & Recovery
	3/2/2021	KBD	1.10	Work on correspondence and subpoena to insurance company regarding potential asset (.9); exchange correspondence with government representative (.2).
				Asset Analysis & Recovery
	3/4/2021	KBD	0.30	Work on correspondence regarding potential asset.
				Asset Analysis & Recovery
	3/5/2021	KBD	0.30	Work on correspondence regarding potential asset.
				Asset Analysis & Recovery
	3/9/2021	KBD	0.20	Exchange correspondence with A. Porter regarding subpoena for records.
				Asset Analysis & Recovery
	3/10/2021	KBD	0.20	Exchange correspondence regarding subpoena for records.
				Asset Analysis & Recovery
	3/12/2021	KBD	0.40	Draft correspondence regarding potential funds with lending entity and review information relating to same (.2); review inventory of records and draft related correspondence to A. Porter (.2).
				Asset Analysis & Recovery
	3/15/2021	KBD	0.20	Exchange correspondence with J. Wine regarding subpoena for records.
				Asset Analysis & Recovery
	3/16/2021	KBD	0.40	Exchange correspondence regarding subpoena for records (.3); exchange correspondence with representatives of potential asset holder (.1).
				Asset Analysis & Recovery
	3/18/2021	KBD	1.10	Telephone conference with insurance company representative and J. Wine regarding records for production and timing (.4); further discussion with J. Wine regarding records and potential asset recovery (.2); exchange correspondence with A. Porter regarding potential claims (.2);

<u>Date</u>	Indiv Hour	<u>Description</u>
		telephone conference with SEC (.2); exchange correspondence with representative for potential asset holder (.1).
		Asset Analysis & Recovery
3/19/2021	KBD 0.30	Exchange correspondence with K. Pritchard regarding service of subpoena (.2); exchange correspondence regarding check from title company (.1).  Asset Analysis & Recovery
3/22/2021	KBD 0.30	Draft correspondence to A. Porter regarding recovery of funds from title company (6160-6212 S Martin Luther King Drive).
0/04/0004	1655	Asset Analysis & Recovery
3/24/2021	KBD 0.10	Exchange correspondence regarding subpoena for records.
		Asset Analysis & Recovery
3/25/2021	KBD 0.20	Exchange correspondence regarding subpoena for records.
		Asset Analysis & Recovery
SUBTOTAL:		[ 6.60
SUBTOTAL:  Asset Disposition		[ 6.60 2574.00]
	KBD 0.50	Telephone conference with real estate broker regarding efforts to market and sell property and offers received (638-40 N Avers Avenue) (.2); attention to purchaser inspection of properties and exchange correspondence with real estate broker regarding efforts to complete sale (single family) (.3).
Asset Disposition	KBD 0.50	Telephone conference with real estate broker regarding efforts to market and sell property and offers received (638-40 N Avers Avenue) (.2); attention to purchaser inspection of properties and exchange correspondence with real
Asset Disposition		Telephone conference with real estate broker regarding efforts to market and sell property and offers received (638-40 N Avers Avenue) (.2); attention to purchaser inspection of properties and exchange correspondence with real estate broker regarding efforts to complete sale (single family) (.3).
Asset Disposition 3/1/2021		Telephone conference with real estate broker regarding efforts to market and sell property and offers received (638-40 N Avers Avenue) (.2); attention to purchaser inspection of properties and exchange correspondence with real estate broker regarding efforts to complete sale (single family) (.3).  Asset Disposition  Exchange correspondence with real estate broker regarding potential purchasers' offers for property (638-40 N Avers Avenue) (.1); exchange correspondence with A. Porter regarding purchase and sale agreement
Asset Disposition 3/1/2021	KBD 0.20	Telephone conference with real estate broker regarding efforts to market and sell property and offers received (638-40 N Avers Avenue) (.2); attention to purchaser inspection of properties and exchange correspondence with real estate broker regarding efforts to complete sale (single family) (.3).  Asset Disposition  Exchange correspondence with real estate broker regarding potential purchasers' offers for property (638-40 N Avers Avenue) (.1); exchange correspondence with A. Porter regarding purchase and sale agreement (638-40 N Avers Avenue) (.1).
Asset Disposition 3/1/2021 3/4/2021	KBD 0.20	Telephone conference with real estate broker regarding efforts to market and sell property and offers received (638-40 N Avers Avenue) (.2); attention to purchaser inspection of properties and exchange correspondence with real estate broker regarding efforts to complete sale (single family) (.3).  Asset Disposition  Exchange correspondence with real estate broker regarding potential purchasers' offers for property (638-40 N Avers Avenue) (.1); exchange correspondence with A. Porter regarding purchase and sale agreement (638-40 N Avers Avenue) (.1).  Asset Disposition  Confer with A. Porter, M. Rachlis, and J. Baasch regarding efforts to sell properties and resolve issues (638-40 N Avers Avenue; 7109-19 S

Date	Indiv	<u>Hours</u>	Description
3/17/2021	KBD	0.30	Asset Disposition  Exchange correspondence with A. Porter regarding purchase and sale agreement amendment (single family) (.1); exchange correspondence with A. Porter regarding timing for approval of sale of property and related
			communications with purchaser (4611-17 S Drexel Boulevard) (.2).  Asset Disposition
3/21/2021	KBD	0.20	Exchange correspondence with J. Wine regarding potential motion to request ruling.  Asset Disposition
3/22/2021	KBD	0.10	Exchange correspondence with A. Porter regarding second amendment to purchase and sale agreement (single family).
			Asset Disposition
3/24/2021	KBD	0.30	Telephone conference with real estate broker regarding tenth motion to approve sales and timing (.2); exchange correspondence with A.Porter regarding notice and repair issue (2129 W 71st Street) (.1).
			Asset Disposition
3/26/2021	KBD	0.50	Exchange correspondence with A. Porter and real estate broker regarding buyer communication relating to conditions of single family residence (single family).
			Asset Disposition
3/29/2021	KBD	2.60	Telephone conference with A. Porter regarding buyer request for credit (single family) (.2); telephone conference with A. Porterregarding sale of properties and plans for seeking court approval (1102 Bingham (Houston, TX); 638-40 N Avers Avenue) (.1); confer with real estatebroker and A. Porter regarding buyer's request for credit and available options (single family) (.5); telephone conference with A. Porter regarding buyer's request for credit and available options (single family) (.2); follow up call with real estate broker and A. Porter regarding buyer's request for credit and available options (single family) (1.3); study and revise draft 12th motion for approval and declaration in support (638-40 N Avers Avenue) (.3).
			Asset Disposition
3/30/2021	KBD	1.70	Confer on multiple calls with real estate broker and A. Porter regarding negotiation over buyer's request for credit and broker's commission (single family) (.7); confer with lender's counsel and A. Porter regarding negotiation over buyer's request for credit and broker's commission (single family) (.2); further confer with real estate broker regarding negotiation over buyer's requestfor credit and broker's commission and planning for closing (single family) (.2); review amendments to sale agreement and commission agreement (single family) and related communication with A. Porter

Date Ind	liv Hours	Description

(single family) (.2); exchange correspondence with A. Porter regarding twelfth sales approval motion and revisions to motion (638-40 N Avers Avenue) (.4).

Asset Disposition

3/31/2021 KBD

0.50 Work on twelfth sales approval motion and revisions to motion (638-40 N Avers Avenue) (.1); exchange correspondence with A. Porter regarding second amendment to PSA and closing for sale of properties (single family) (.2); exchange correspondence with A. Porter regarding allocations for single family portfolio properties (single family) (.2).

**Asset Disposition** 

SUBTOTAL: [ 7.60 2964.00]

#### **Business Operations**

3/1/2021 KBD 0.10 Attention to street and sanitation notice (8209 S Ellis Avenue).

**Business Operations** 

3/2/2021 KBD

0.20 Exchange correspondence with E. Duff regarding restoration issue regarding property (7749-59 S Yates Boulevard) (.1); attention to property inspections (single family) (.1).

**Business Operations** 

3/5/2021 KBD

0.20 Study property manager financial reporting (4533-47 S Calumet Avenue; 6949-59 S Merrill Avenue).

**Business Operations** 

3/9/2021 KBD

0.40 Exchange correspondence with J. Rak and insurance broker regarding information for insurance renewal (.1); exchange correspondence with J. Wine regarding property repair issue (2129 W 71st Street) (.1); review building code notice (7109-19 S Calumet Avenue) (.1); attention to inspection and repair issue (6217-27 S Dorchester Avenue) (.1).

**Business Operations** 

3/11/2021 KBD

0.70 Study property manager financial reporting (1017 W 102nd Street; 1516 E 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; 5437 S Laflin Street; 6759 S Indiana Avenue; 4611-17 S Drexel Boulevard; 6217-27 S Dorchester Avenue; 7024-32 S Paxton Avenue;

Date	Indiv	Hours	Description
Date	IIIuiv	HOUIS	Describition

1422-24 East 68th Street; 2800-06 E 81st Street; 4750-52 S Indiana Avenue; 7840-42 S Yates Avenue; 1414-18 East 62nd Place) (.4); study other property manager financial reporting (.3).

**Business Operations** 

3/12/2021 KBD 0.20 Attention to tax lien (1102 Bingham (Houston, TX)).

**Business Operations** 

3/15/2021 KBD

0.60 Study property manager financial reporting (1017 W 102nd Street; 1516 E 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; 5437 S Laflin Street; 6759 S Indiana Avenue; 4611-17 S Drexel Boulevard; 6217-27 S Dorchester Avenue; 7024-32 S Paxton Avenue; 1422-24 East 68th Street; 2800-06 E 81st Street; 4750-52 S Indiana Avenue; 7840-42 S Yates Avenue; 1414-18 East 62nd Place) (.5); attention to administrative court notice (6356 S California Avenue) (.1).

**Business Operations** 

3/16/2021 KBD

0.50 Exchange correspondence with J. Wine and J. Rak regarding communication from counsel regarding tax lien (1102 Bingham (Houston, TX)) (.2); exchange correspondence with insurance broker regarding renewal of insurance (.2); attention to property expense (7201 S Constance Avenue) (.1).

**Business Operations** 

3/17/2021 KBD

0.40 Exchange correspondence with J. Wine regarding property repair issue (2129 W 71st Street) (.1); exchange correspondence with N. Gastevich regarding defendants' communications with real estate broker (.1); exchange correspondence with K. Pritchard regarding property expense (2736-44 W 64th Street) (.2).

**Business Operations** 

3/19/2021 KBD

0.40 Attention to default judgment, lack of notice, and communication with City representatives (6250 S Mozart Street) (.1); attention to transfer of funds for property expenses (638-40 N Avers Avenue; 1401 W 109th Place) (.3).

**Business Operations** 

3/22/2021 KBD

0.30 Exchange correspondence with insurance broker regarding renewal of coverage for all remaining properties.

<u>D</u>	Date Ir	ndiv Ho	urs De	escription		
				Business Operations		
3	3/30/2021	KBD	0.20	Study correspondence from insurance broker regarding	g renewal.	
				Business Operations		
SUBTOTA	۸L:				[ 4.20	1638.00]
Claims Ad	ministratio	n & Obj	<u>ection</u>	<u>S</u>		
3	3/1/2021	KBD	0.60	Attention to claimants' communications regarding claim on single claim process and exchange correspondence regarding process issues (.3).		
				Claims Administration & Objections		
3	3/2/2021	KBD	0.30	Exchange correspondence with J. Wine regarding cl service issue (.2); exchange correspondence with J. W communication and documentation issue (.1).		
				Claims Administration & Objections		
3	3/3/2021	KBD	0.60	Work on joint status report (.2); work on single claim procorrespondence from J. Wine regarding process issues correspondence with J. Wine and M. Rachlis regarding claimants with claims documentation link (.2).	s (.2); exchar	nge
				Claims Administration & Objections		
3	3/4/2021	KBD	1.00	Study joint status report and exchange correspondence Rachlis regarding revisions (.4); work on responses to attention to claims vendor agreementand proposed characteristics.	claimants (.4	
				Claims Administration & Objections		
3	3/5/2021	KBD	1.20	Attention to claimant communication and review of clair (.3); work on joint status report and exchange various r correspondence (.9).		tation
				Claims Administration & Objections		
3	3/8/2021	KBD	0.20	Work on communications with claimants relating to dist documentation.	ribution of cl	aims
				Claims Administration & Objections		
3	3/9/2021	KBD	1.50	Telephone conference with J. Wine, J. Rak, and IT condocuments for EB database and distribution of claims of exchange correspondence with J. Wine regarding claim (1414-18 East 62nd Place) (.2); exchange correspondence communications with claimants (.1); exchange correspondence (.1); exchange (.1); exchang	documentations against pre ence regardin	on (.9); operty ng

communications with claimants (.1); exchange correspondence with

Date	Indiv	Hours	Description

J. Wine regarding improvement to master claims spreadsheet (.1); study inventory of EB documents (.2).

Claims Administration & Objections

3/10/2021 KBD

0.40 Telephone conference with and study correspondence from IT consultant regarding copying and preparation of electronic records for production (.1); exchange correspondence with J. Wine regarding claims against property (1414-18 East 62nd Place) (.1); exchange correspondence with J. Wine regarding claims process and counsel for claimants (.1); exchange correspondence with J. Wine regarding property groupings for claims process (.1).

Claims Administration & Objections

3/11/2021 KBD

1.90 Telephone conference with M. Rachlis regarding claims process issues and planning (.4); study proposed process for single claim properties (.3); confer and exchange correspondence with M. Rachlis and J. Wine regarding single claim properties single claim properties (1.2).

Claims Administration & Objections

3/12/2021 KBD

1.40 Work with IT consultant and J. Rak regarding preparation of electronic records for EB database vendor (.5); confer with J. Wine and A. Porter regarding potential single claim properties and related issues (.8); exchange correspondence regarding single claims process (.1).

Claims Administration & Objections

3/14/2021 KBD

0.50 Analysis of single claim process (.3); draft correspondence regarding hard drive with electronic records from defendants' devices for inclusion in EB records database (.2).

Claims Administration & Objections

3/15/2021 KBD

2.30 Work with IT consultant, J. Wine, and J. Rak regarding preparation of electronic records for EB database vendor (.4); further discussions with IT consultant (.5); exchange further correspondence relating to electronic record for EB database (.2); telephone conference regarding recovery and copying of devices for production to claims document database vendor (.5); telephone conference with claimant's counsel and J. Wine regarding single claim properties and process (.5); study correspondence with vendor regarding various document issue for EB database (.2).

Claims Administration & Objections

3/17/2021 KBD

0.40 Exchange correspondence regarding claims vendor work with EB records (.2); exchange correspondence regarding claimant inquiries about claims process (.2). Date Indiv Hours Description Claims Administration & Objections

3/18/2021 KBD 0.20 Exchange correspondence with J. Wine regarding potential claim (1102 Bingham (Houston (TX)) (.1); study correspondence relating to communications with claimants regarding claims documentation (.1).

Claims Administration & Objections

3/19/2021 KBD 1.10 Prepare for and participate in telephone conference with claimants counsel and J. Wine regarding single claim process and potential third path to claims resolution for certain properties, sale of single family portfolio, and potential alternatives for claims resolution (single family) (.8); exchange correspondence regarding electronic records on defendants' devices for

> EB database (.1); exchange correspondence with J. Wine regarding communications with claimants relating to claims process (.2).

Claims Administration & Objections

3/22/2021 KBD 0.50 Exchange correspondence with J. Rak regarding vendor for review of electronic records (.2); exchange correspondence with N. Gastevich regarding investigation relating to claims in regard to scope of single claim process (7110 S Cornell Avenue; 6749-59 S Merrill Avenue) (.2); exchange correspondence with J. Wine regarding communications with claimants regarding claims documentation and claims process (.1).

Claims Administration & Objections

3/23/2021 KBD

0.10 Study correspondence from claimants' counsel regarding request for records.

Claims Administration & Objections

3/24/2021 KBD 1.50 Study correspondence from and brief telephone conference with claimants' counsel regarding request for claims documentation (.2); confer with M. Rachlis and J. Wine regarding claimants' counsel's request for claims documentation (.7); draft response to correspondence from claimants' counsel regarding request for claims documentation and exchange correspondence with J. Wine regarding revisions (.5); study correspondence from N. Gastevich regarding claims investigation (7110 S Cornell Avenue; 6749-59 S Merrill Avenue) (.1).

Claims Administration & Objections

3/25/2021 KBD 1.40 Draft correspondence to claimants regarding claims process (.8); revise correspondence to claimants' counsel regarding request for records and exchange correspondence with J. Wine and M. Rachlis regarding same (.3); study correspondence from A. Porter regarding claims investigation (7110 S Cornell Avenue: 6749-59 S Merrill Avenue) (.2): exchange correspondence with J. Wine regarding claimant communications regarding claims process (.1).

Date	Indiv Hours	Description
		Claims Administration & Objections
3/26/2021	KBD 2.90	Telephone conferences and exchange correspondence with J. Wine regarding communication with claimants relating to claims process and claims documentation 1.2); draft and revise correspondence to claimants regarding claims process (1.4); attention to communication from claimant regarding claims process (.1); exchange correspondence with J. Rak regarding vendor communication and electronic records (.1); study correspondence from vendor regarding preparation of electronic records for EB database (.1).
		Claims Administration & Objections
3/27/2021	KBD 0.20	Attention to communications from claimants regarding claims process.
		Claims Administration & Objections
3/28/2021	KBD 0.60	Legal research regarding issues relating to claims issues and exchange correspondence with J. Wine regarding same.
		Claims Administration & Objections
3/29/2021	KBD 0.80	Draft correspondence to claimants' counsel regarding records request (.3); exchange related correspondence with M. Rachlis regarding claimants' records request (.1); work on electronic records for EB database (.2); work on responses to claimants (.2).
		Claims Administration & Objections
3/31/2021	KBD 0.60	Work on responses to claimants regarding claims process (.2); study correspondence from claimant's counsel regarding potential properties for single claim process (.2); study correspondence from J. Wine regarding single claim process (.1); attention to granting of tenth sales motion and exchange various related correspondence regarding single claim process (.1).
		Claims Administration & Objections
SUBTOTAL:		[22.20 8658.00]
Tax Issues		
3/29/2021	KBD 0.30	Telephone conference with accounting firm representative and J. Rak regarding tax issue.
		Tax Issues
3/30/2021	KBD 0.90	Telephone conference with tax advisors regarding potential tax issues.

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Date	Indiv Hours Description			
	Tax Issues			
SUBTOTAL:			 [ 1.20	468.00]
			41.80	\$16,302.00
	Summary of Activity	Hours	Rate	
Kevin B. Duff		41.80	390.00	\$16,302.00

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### **SUMMARY**

TOTAL DUE	\$16,302.00
Other Charges	\$0.00
Legal Services	\$16,302.00

# Exhibit G

# Case: 1:18-cv-05587 Document #: 993-1 Filed: 05/17/21 Page 55 of 162 PageID #:32343 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

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May 17, 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.6622130

Legal Fees for the period January 1-31, 2021 \$93,773.00

Expenses Disbursed \$1,252.99

Due this Invoice \$95,025.99

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	Description				
Accounting/Auditing	Accounting/Auditing						
1/4/2021	KMP	0.40	Review bank records and update account ledgers, communicate with K. Duff regarding same.				
			Accounting/Auditing				
1/5/2021	KMP	0.60	Prepare account balance report utilizing bank's online platform (.3); review and revise same (.2); communicate with K. Duff regarding same (.1).				
			Accounting/Auditing				
1/8/2021	KMP	1.20	Review bank notice regarding account activity, and communicate withbank representatives and K. Duff regarding same (.3); prepare December schedules of receipts and disbursements for Receivership accounts (.9).				
			Accounting/Auditing				
1/11/2021	KMP	0.40	Update account ledgers to reflect recent transactions (.2); communicate with K. Duff regarding deposit instructions (431 E 42nd Place) (.2).				
			Accounting/Auditing				
1/25/2021	KMP	0.80	Prepare report of property account aggregate balances and communicate with K. Duff regarding same.				
			Accounting/Auditing				
SUBTOTAL:	SUBTOTAL: [ 3.40 476.00						
Asset Analysis & Re	cover	_					
1/4/2021	KMP	_	Review bank records regarding potential asset (.2); work on notice of receivership and document subpoena relating to same (.3).				
			Asset Analysis & Recovery				
	MR	0.20	Attention to email regarding subpoena.				
			Asset Analysis & Recovery				
1/5/2021	KMP	1.30	Work on notices of receivership, and prepare document subpoenas and rider relating to same.				
	Asset Analysis & Recovery						
	JRW	0.40	Review and revise draft notice letters (.2); review subpoenas and exhibit to same (.2).				

<u>Date</u>	<u>Indiv</u>	Hours	Description
			Asset Analysis & Recovery
1/5/2021	MR	0.30	Attention to subpoena regarding potential assets.
			Asset Analysis & Recovery
1/6/2021	KMP	0.50	Revise notices of receivership, and communicate with EB team regarding issues relating to document subpoenas.
			Asset Analysis & Recovery
	MR	0.30	Attention to subpoena issues regarding same.
			Asset Analysis & Recovery
1/7/2021	KMP	1.20	Revise subpoena and finalize rider and exhibit (.6); prepare notice of third-party subpoena in connection with same (.4); communicate with EB team regarding the foregoing (.2).
			Asset Analysis & Recovery
	JRW	0.20	Review and revise draft subpoena and notice regarding same.
			Asset Analysis & Recovery
1/8/2021	KMP	1.30	Finalize subpoena and communicate with process server regarding service of same and of notice letter (.4); serve notice of third-party subpoena in connection with same (.2); communicate with EB team regarding the foregoing and regarding subpoena and notice letter (.4); review collection notice relating to entity (1516 E 85th Place Assoc) and communicate with K. Duff and A. Porter regarding notice of receivership (.3).
			Asset Analysis & Recovery
1/11/2021	KMP	0.50	Communicate with process server regarding service of subpoena and notice letter, and research regarding new address for service (.4); attention to communication with law firm regarding subpoena and notice letter (.1).
			Asset Analysis & Recovery
	AEP	0.30	Teleconference with K. Duff and M. Rachlis regarding potential claims.
			Asset Analysis & Recovery
1/12/2021	KMP	0.20	Revise and finalize notice letter.

	Date Indiv Hours Description						
				Asset Analysis & Recovery			
	1/14/2021	KMP	0.60	Attention to potential claims.			
				Asset Analysis & Recovery			
	1/27/2021	SZ	0.90	Attention to tax ID numbers.			
				Asset Analysis & Recovery			
SUBTO	TAL:			[ 8.70 1538.00]			
Asset D	isposition		_				
	1/3/2021	AEP	0.60	Read memorandum in opposition to Eleventh Motion To Confirm Sales and prepare reply in support of motion (7237-43 S Bennett Avenue).			
				Asset Disposition			
		MR	1.00	Work on response on 11th motion to confirm (7237-43 S Bennett Avenue).			
				Asset Disposition			
	1/4/2021	KMP	1.50	Review, revise, and finalize reply in support of eleventh motion to approve property sales and file same with court (7237-43 S Bennett Avenue) (.7); serve reply on defendant (7237-43 S Bennett Avenue) (.2); communicate with EB team regarding the foregoing (7237-43 S Bennett Avenue) (.2); communicate with bank representative to confirm receipt of final distribution for property (2453-59 E 75th Street) from property manager (.2); briefly review property manager's report in connection with same(2453-59 E 75th Street) (.2).			
				Asset Disposition			
		MR	1.00	Attention to brief on 11th motion to confirm and various comments and follow up regarding response (7237-43 S Bennett Avenue).			
				Asset Disposition			
	1/5/2021	JR	2.20	Organization and research property information related to original EquityBuild purchase dates, recording dates, purchase price, EquityBuild debt and mechanic's lien regarding properties in receivership and previously acquired and sold properties and update EquityBuild portfolio spreadsheet.			
				Asset Disposition			
		AEP	1.60	Prepare e-mail to purchaser of receivership property (1102 Bingham (Houston, TX)) regarding expiration of contract contingencies and intention to file motion toconfirm sale (.1); research amended corrective recording rules in Cook County and prepare corrective recording affidavits for single-family home properties (7933 S Kingston Avenue; 8104 S			

Kingston Avenue; 8529 S Rhodes Avenue) (1.4); prepare e-mails to property managers for single-family homes regarding abstention from capital repairs absent consent of receiver (single family) (.1).

**Asset Disposition** 

1/6/2021 JR

0.20 Review email from real estate associate requesting updated due diligence documents related to marketing of single family homes (single family) (.1); request same from property management regarding single family homes (single family) (.1).

**Asset Disposition** 

AEP 1.00 Teleconference with title underwriter regarding consolidation of title commitments for single-family home properties into distinct separately invoice sets, corporate existence pertaining to (EB South Chicago 2) entities for which corrective deeds will be recorded, and resolution of ambiguities relating to ownership of two properties for which recorded deeds contained mismatched pages (single family) (.5); update title company spreadsheet with value allocations for each property (single family) (.3); prepare e-mail to title company enclosing corporate authority documentation for single-family home entities subject to the recording of corrective deeds for three (EB South Chicago 2) entities (single family) (.2).

**Asset Disposition** 

MR 0.10 Attention to property (638-40 N Avers Avenue) issues.

**Asset Disposition** 

1/7/2021 JR

0.20 Review email from property management related to single family homes and review of due diligence documents regarding same (single family).

**Asset Disposition** 

1/8/2021 JR

0.20 Review email from K. Duff regarding request for addendum to Purchase and Sale Agreement for property (638-40 N Avers Avenue) and provide same.

Asset Disposition

risk (single family) (.1).

AEP 0.60 Consult settlement statement from closing of receivership property (431 E 42nd Place) and respond to e-mail from K. Duff regarding nature of checks disbursed from escrow holdbacks (.1); prepare e-mail for general distribution to counsel for purchasers of remaining properties in tenth sales tranche (4611-17 S Drexel Boulevard; 6217-27 S Dorchester Avenue; 7024-32 S Paxton Avenue; 7255-57 S Euclid Avenue; 1422-24 East 68th Street; 2800-06 E 81st Street; 4750-52 S Indiana Avenue; 7840-42 S Yates Avenue) regarding status of ruling on motion to confirm (.4); teleconference with title underwriter regarding single-family home title exceptions being waived on

#### **Asset Disposition**

1/8/2021 MR

1.20 Review materials to prepare for meeting on sale of property (638-40 N Avers Avenue) (.5); participate in meeting and follow up with K. Duff regarding sale of property (638-40 N Avers Avenue) (.7).

**Asset Disposition** 

1/10/2021 AEP

0.70 Review and analyze title commitment associated with receivership property (1102 Bingham (Houston, TX)), analyze all title exception documents, and update closing checklist.

**Asset Disposition** 

1/11/2021 KMP

0.40 Telephone conference with J. Wine regarding property manager's post-sale reconciliation reports and review online bank records to confirm deposits of post-sale funds (7508 S Essex Avenue; 4520-26 S Drexel Boulevard; 7450 S Luella Avenue; 5450-52 S Indiana Avenue; 6437-41 S Kenwood Avenue; 7110 S Cornell Avenue; 3074 E Cheltenham Place).

**Asset Disposition** 

JR

4.00 Exchange communication with J. Wine regarding post-closing reconciliation request and provide same (7508 S Essex Avenue; 4520-26 S Drexel Boulevard; 7450 S Luella Avenue; 5450-52 S Indiana Avenue; 6437-41 S Kenwood Avenue; 7110 S Cornell Avenue; 3074 E Cheltenham Place) (.1); follow up communication with property management regarding updates to due diligence documents related to single family homes (single family) (.1); review due diligence documents for all single family homes, update electronic files and update master rent roll and property folders requested by broker (single family) (3.1); exchange correspondence with property management requesting missing items (single family) (.2); update electronic files for same (single family) (.4); exchange correspondence with brokerage firm advising of all requested due diligence document updates related to single family homes (single family) (.1).

**Asset Disposition** 

AEP 0.80 Review application for municipal relief in connection with potential development of receivership property (1102 Bingham (Houston, TX)) and respond to counsel for purchaser regarding same (.2); read tax deficiency notice pertaining to entity (1516 E 85th Place Associates) and prepare e-mail to title underwriter inquiring as to legal effect (1516 E 85th Place) (.2); review administrative pleadings forwarded by J. Wine in connection with receivership property (6250 S Mozart) and provide suggested response (.1); teleconference with title underwriter regarding potential defects in conveyance of receivership property (1516 E 85th Place), existence of operating agreement for ownership entity, and need for scrivener's affidavit (.3).

**Asset Disposition** 

1/13/2021 KMP

0.60 Review various property accounts to confirm that post-reconciliation funds have not been received from property manager and communicate with K. Duff and J. Rak regarding same (7748-52 S Essex Avenue; 701-13 S 5th Avenue; 6749-59 S Merrill Avenue; 7546-48 S Saginaw Avenue; 8326-32 S Ellis Avenue; 7760 S Coles Avenue; 8000-02 S Justine Street; 8107-09 S Ellis Avenue; 8214-16 S Ingleside Avenue; 8201 S Kingston Avenue; 11117-11119 S Longwood Drive; 7300-04 S St Lawrence Avenue; 7957-59 S Marquette Road; 2736-44 W 64th Street; 6356 S California Avenue; 6355-59 S Talman Avenue; 5618-20 S Martin Luther King Drive; 7201 S Constance Avenue; 6554-58 S Vernon Avenue; 1700-08 W Juneway Terrace: 7201-07 S Dorchester Avenue).

**Asset Disposition** 

JR 4.10 Review email from brokerage firm related to requested items related to single family homes and respond accordingly (single family) (.3); telephone call with A. Porter regarding requested items related to the single family home portfolio (single family) (.5); exchange correspondence with brokerage firm providing requested information related to single family homes (single family) (.6); exchange correspondence with property management requesting due diligence items related to single family homes (single family) (.2); review email from K. Duff regarding property manager report related to cash balance report, update closing dates regarding same and provide report to K. Duff (7748-52 S Essex Avenue; 701-13 S 5th Avenue; 6749-59 S Merrill Avenue; 7546-48 S Saginaw Avenue; 8326-32 S Ellis Avenue; 7760 S Coles Avenue; 8000-02 S Justine Street; 8107-09 S Ellis Avenue; 8214-16 S Ingleside Avenue; 8201 S Kingston Avenue; 11117-11119 S Longwood Drive; 7300-04 S St Lawrence Avenue; 7957-59 S Marquette Road; 2736-44 W 64th Street; 6356 S California Avenue; 6355-59 S Talman Avenue; 5618-20 S Martin Luther King Drive; 7201 S Constance Avenue; 6554-58 S Vernon Avenue; 1700-08 W Juneway Terrace; 7201-07 S Dorchester Avenue) (.4); review property tax balances and update outstanding tax report related to all single family homes and remaining unsold multi-family homes (single family) (2.1).

**Asset Disposition** 

AEP 1.70 Teleconference with J. Rak regarding responses to inquiries from broker regarding single-family home portfolio (single family) (.4); finalize purchase and sale contract for conveyance of single-family home portfolio and transmit same to receivership broker (single family) (.5); reorganize all single-family home files into tranches consistent with deeds and title commitments (single family) (.8).

**Asset Disposition** 

1/14/2021 KMP

1.10 Edit property manager's cash balance spreadsheet to provide information for post-reconciliation transfers of funds, and prepare email correspondence to property manager transmitting same.

**Asset Disposition** 

1/15/2021 JR

1.10 Review email from brokerage firm, confer with K. Duff and respond accordingly (single family) (.1); review email from leasing manager regarding lease renewal requests for propertiescurrently under contract (7237-43 S Bennett Avenue; 7109-19 S Calumet Avenue) and confer with A. Porter regarding same (.2); exchange correspondence with buyer's counsel regarding same (7237-43 S Bennett Avenue) (.1); review email from property management regarding previous request for foundation work performed at property (2136 W 83rd Street) and provide details of work to brokerage firm (.2); update post-closing reconciliation reports and request update from property managers relating all closed properties (.5).

**Asset Disposition** 

AEP 0.20 Teleconference with counsel for purchaser of receivership property (6250 S Mozart) regarding inability of cell tower lessee to redirect post-closing rent absent receiver authority and prepare e-mail to tenant regarding same.

**Asset Disposition** 

1/18/2021 MR

1.10 Review email regarding summary and issues for single family home sales (single family) (.2); meeting on single family home sale (single family) (.9).

**Asset Disposition** 

1/19/2021 JR

0.50 Telephone call with A. Porter regarding purchase and sale contract and buyer/seller deadline regarding relating to the Houston property (1102 Bingham (Houston, TX)).

Asset Disposition

**AEP** 

1.30 Research bulk sales laws of City of Chicago, Cook County, and State of Illinois and prepare e-mail to counsel for purchaser of receivership property (4611 S Drexel) explaining why bulk sales notices are inapplicable to transaction.

**Asset Disposition** 

1/20/2021 JR

0.50 Review email from property management and provide post-sale information for property (7110 S Cornell Avenue) (.1): exchange communication with A. Watychowicz and provide closed property information (.2); review email from J. Baasch regarding requested due diligence documents for properties (4750-52 S Indiana Avenue; 7024-32 S Paxton Avenue) (.1); exchange correspondence with the buyer regarding due diligence documents for properties (4750-52 S Indiana Avenue; 7024-32S Paxton Avenue) (.1).

**Asset Disposition** 

1/21/2021 KMP

0.30 Review online banking records to confirm receipt of post-reconciliation funds from property manager and communicate with K. Duff and J. Rak regarding same (1700-08 W Juneway; 7300-04 S St Lawrence Avenue; 7760S Coles Avenue; 8000-02 S Justine Street; 8107-09 S Ellis Avenue; 8209 S Ellis Avenue; 8214-16 S Ingleside Avenue; 6749-59 S Merrill

Avenue; 701-13S 5th Avenue; 7201 S Constance Avenue; 2736-44 W 64th Street; 6355-59 S Talman Avenue; 6356 S California Avenue; 7201-07 S Dorchester Avenue; 7546-48 S Saginaw Avenue; 7748-52 S Essex Avenue; 7957-59 S Marquette Road; 8326-58 S Ellis Avenue; 5618-20 S Martin Luther King Drive).

Asset Disposition

1/21/2021 JR

2.70 Telephone conference with K. Duff, M. Rachlis, A. Porter and brokerage firm regarding final and best offers from interested buyers related to single family homes (single family) (.6); review post-closing reconciliation discrepancies and follow up correspondence with property manager regarding same (.6); exchange communication with K. Pritchard regarding post-closing reconciliation discrepancies (.2); exchange correspondence with buyer requesting more information regarding due diligence ledger (4750-52 S Indiana Avenue; 7024-32 S Paxton Avenue) (.1); review and organize due diligence documents (4750-52 S Indiana Avenue; 7024-32 S Paxton Avenue) (.8); request updated due diligence documents from property management (4750-52 S Indiana Avenue; 7024-32 S Paxton Avenue) (.3); review email from K. Duff related to sold property (6949-59 S Merrill Avenue) regarding a public nuisance notice received in the mail and notify purchaser's team of same (.1).

**Asset Disposition** 

**AEP** 

2.20 Conference call with receivership brokers regarding results of "highest and best" bid submissions in connection with single-family home portfolio, bases for potentially low offer prices, and strategy for proceeding (single family) (.5); teleconference with K. Duff, M. Rachlis, and real estate broker regarding single-family home marketing efforts (single family) (.4); teleconference with prospective purchaser of receivership property (1102 Bingham (Houston, TX)) regarding zoning relief application and other predevelopment entitlement issues (.3); conference call with receivership brokers, counsel for secured lenders, K. Duff, and M. Rachlis regarding outcome of marketing effort for single family homes and next steps in sales process (single family) (.4); review title commitments for all single-family homes and create list of encumbrances potentially requiring hold harmless letters or other clearance (single family) (.6).

**Asset Disposition** 

MR

1.70 Attention to single family home issues with real estate broker (single family) (.6); follow up conference with K. Duff and A. Porter regarding single family home issues (single family) (.3); conference regarding process with claimant's counsel and regarding single family home portfolio (single family) (.4); review issues on property (638-40 N Avers Avenue) and follow up with K. Duff (.4).

Asset Disposition

Kevin B. Duff, Receiver

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

1/22/2021 JR

5.00 Review email from J. Wine related to housing court matter for property (7600-10 S Kingston Avenue) and provide requested closing documents regarding same (.1); draft water applications for the single-family homes (single family) (2.5); review email from property management regarding requested due diligence documents and request missing items related to properties (4750-52 S Indiana Avenue; 7024-32 S Paxton Avenue) (.3); review and organize electronically due diligence documents and request additional missing items from property manager due to inconsistencies and inaccuracy of reports (4750-52 S Indiana Avenue) (1.9); exchange correspondence with A. Porter regarding new tenant lease at property (4750-52 S Indiana Avenue) (.2).

**Asset Disposition** 

1/25/2021 JR

1.60 Review and organize due diligence documents and request additional missing items from property manager (7024-32 S Paxton Avenue)(1.5); exchange correspondence with the property manager requesting additional missing items (7024-32 S Paxton Avenue) (.1).

**Asset Disposition** 

1/26/2021 JR

0.20 Review email from property management regarding security guard working on property (7024-32 S Paxton Avenue), further communication with A. Porter regarding same.

**Asset Disposition** 

1/27/2021 AEP

0.80 Review rider to purchase and sale agreement tendered by prospective purchaser of single-family homes and prepare e-mail to K. Duff regarding lack of corporate existence of signatory to agreement (single family) (.4); review administrative orders forwarded by J. Wine, reconcile same against property closing checklists, and prepare responsive e-mail requesting report on status of additional outstanding cases (7656-58 S Kington Avenue; 6554-58 S Vernon Avenue; 6356 S California Avenue; 5618-20 S Martin Luther King Drive; 7109-19 S Calumet Avenue; 7024-32 S Paxton Avenue; 6217-27 S Dorchester) (.4).

**Asset Disposition** 

1/28/2021 KMP

0.30 Exchange correspondence with property manager regarding post-closing reconciliation of properties (816-22 E Marquette Road; 7442-54 S Calumet Avenue, 7701-09 S Essex Avenue).

**Asset Disposition** 

JR

1.10 Review email from A. Porter and J. Wine regarding judgment releases (4611-17 S Drexel Boulevard; 7024-32 S Paxton Avenue) and locate and save original copies for closing (.2); review email from K. Duff requesting an addendum for property (638-40 N Avers Avenue) and provide same (.1); review email from property management, A. Porter and purchaser regarding requested property information and provide same to purchaser relating to properties (4750-52 S Indiana Avenue; 7024-32 S Paxton Avenue) (.5); review email from K. Duff regarding previously sold property and work scheduled to be completed on property and forward same to buyer

<u>Date</u>	Indiv Ho	ours D	escription
			(6250 S Mozart Street) (.2); review email from M. Rachlis requesting closing statement for previously sold property (6949-59 S Merrill Avenue) and provide same (.1).
			Asset Disposition
1/28/2021	AEP	0.20	Read and respond to e-mail from J. Wine regarding status of administrative actions and location of releases, and update tracking spreadsheet accordingly.
			Asset Disposition
DTAL:			[45.60 10834.00]

SUBTOTAL: [45.60 10834.0

Business Operations

1/4/2021 ED

0.90 Review and analysis of reporting regarding remaining reimbursable amounts from properties, and email correspondence with K. Duff regarding same (.3); analysis of property manager financial reporting from October and November 2020 (.5); email correspondence accountant regarding September accounting reports (.1).

**Business Operations** 

1/5/2021 JR 4.20 Review email from accounting firm and E. Duff regarding September reports and respond accordingly regarding status review of same (.1); produce documents, review and analyze September reporting (4.1).

**Business Operations** 

KMP 0.20 Communicate with E. Duff regarding schedules of receipts and disbursements for October and November 2020 and forward same to her.

**Business Operations** 

1/6/2021 ED 3.30 Review of draft accounting reports through September 2020 (1.9); email correspondence with J. Rak to verify property manager reporting for one property (7201 S Constance Avenue) (.1); prepare analysis of rent restoration completed and remaining restoration amounts per property (1.3).

**Business Operations** 

JR 2.50 Continue review and analyze September property reports (2.4); exchange correspondence with E. Duff regarding missing item related to September reporting (.1).

**Business Operations** 

1/7/2021 ED 3.40 Continue review of September accounting reports, including analysis of rent restoration completed, accrual of reimbursable amounts for insurance premiums and other expenditures, and final reporting from property managers with respect to sold properties.

Date Indiv Hours Description **Business Operations** ED 1/8/2021 0.90 Continue review of September accounting reports, including analysis of rent restoration completed, accrual of reimbursable amounts for insurance premiums and other expenditures, and final reporting from property managers with respect to sold properties. **Business Operations** 1/11/2021 KMP 0.70 Prepare form for transfer of funds to financing company for insurance premium installment, and communicate with bank representatives and K. Duff regarding same (.4); communicate with J. Rosen Wine regarding property manager's reporting portals and credentials for same (.3). **Business Operations JRW** 1.20 Communicate with K. Duff regarding status of motion for approval of payments and send proposed order to Judge Lee's courtroom deputy (7749-59 S Yates Boulevard; 8201 S Kingston Avenue; 8047-55 S Manistee Avenue: 7051 S Bennett Avenue: 431 E 42nd Place: 4520-26 S Drexel Boulevard) (.4); exchange correspondence with A. Porter and K. Duff regarding default judgment (6250 S Mozart Street) (.2); study spreadsheets from property manager (2220 East 75th Street; 2453-59 E 75th Street; 4520-26 S Drexel Boulevard; 5450-52 S Indiana Avenue; 6437-41 S Kenwood Avenue; 7110 S Cornell Avenue; 7836 S Shore Drive) (.6). **Business Operations** 1/12/2021 ED 0.60 Review revised statement drafts from accountant and draft email explaining comments and corrections necessary. **Business Operations** 0.60 Correspondence to property managers regarding scheduling of inspections 1/13/2021 JRW in housing court matters (638-40 N Avers Avenue;6217-27 S Dorchester Avenue; 7237-43 S Bennett Avenue) (.2); related review of records and correspondence with team (638-40 N Avers Avenue; 6217-27 S Dorchester Avenue; 7237-43 S Bennett Avenue) (.2); review housing court complaint (638-40 N Avers Avenue) and related correspondence with K. Duff (.2). **Business Operations** 1/14/2021 KMP 0.20 Communicate with property manager and K. Duff regarding funds transfer for security installation (7237-43 S Bennett Avenue). **Business Operations** 0.30 Email correspondence with accountant and J. Rak to confirm list of sold ED properties for analysis of reimbursable amounts owed, and review of related correspondence and documents.

<u>Date</u>	Indiv	Hours	Description
			Rusiness Operations
			Business Operations
1/14/2021	JR	0.40	Review email from E. Duff and provide requested property information and closed property report (.2); review email from K. Pritchard and provide cash balance report as requested for closed properties (.2).
			Business Operations
1/15/2021	KMP	0.70	Prepare form for transfer of funds to property manager for security installation (7237-42 S Bennett Avenue) and forward to K. Duff (.2); revise list of EB entities to include tax identification numbers (.5).
			Business Operations
	ED	0.40	Begin review of revised drafts of September 2020 accounting reports.
			Business Operations
1/16/2021	ED	2.00	Continue review of revised reports and of summary analysis of remaining rent restoration and reimbursable amounts as of September 31, 2020 (1.7); draft and send email to accountant regarding questions and comments based upon review (.3).
			Business Operations
1/18/2021	KMP	0.30	Revise forms for transfer of funds to property manager for security installations (7237-43 S Bennett Avenue; 638-40 N Avers Avenue).
			Business Operations
	ED	1.60	Review of revised September reports from accountant (.3), begin preparation for transmission of September reports to lenders' counsel (.6) exchange email correspondence with A. Watychowiczand J. Rak regarding September reports to lenders' counsel (.3); telephone conference with A. Watychowicz regarding same (.1); email correspondence with K. Duff regarding completion of rent restoration to two properties (4520-26 S Drexel Boulevard; 6749-59 S Merrill Avenue) (.3).
			Business Operations
1/19/2021	KMP	0.40	Further revisions to forms for transfer of funds to property manager for security installations (7237-43 S Bennett Avenue, 638-40 N Avers Avenue), and communications with bank representatives and K. Duff regarding same.
			Business Operations
	ED	1.50	Review and analysis of documents and email correspondence regarding adjustments to allocations of insurance costs, application of refunds, and reduction of payments due under insurance premium finance agreements, to reflect changes in property portfolio due to property sales (.5); analysis of effect of these actions on rent restoration due to certain properties (4520-26 S Drexel Boulevard; 6749-59 S Merrill Avenue) (.3); draft and send email to

K. Duff, M. Rachlis, and J. Wine with description of same (4520-26 S Drexel Boulevard; 6749-59 S Merrill Avenue) (.7).

**Business Operations** 

1/19/2021 AW

1.20 Call with J. Rak regarding preparation of financial reports for institutional lenders and prepare same as per E. Duff's request.

**Business Operations** 

1/22/2021 AW

0.20 Email exchange with counsel and accountant regarding entity's standing (5450 S Indiana LLC) (.1); attention to notice from police department (6949-59 S Merrill Avenue) and communicate with counsel (.1).

**Business Operations** 

**JRW** 

0.40 Exchange correspondence with A. Porter and K. Duff regarding default judgment and collection notice in administrative matter (6250 S Mozart Street) (.3); correspond with J. Rak regarding closing documentation related to housing court matter (7600-10 S Kingston Avenue) (.1).

**Business Operations** 

1/24/2021 ED

2.10 Draft descriptions of rent restoration and reimbursement actions taken in September 2020 and effect on data presented in September accounting reports (.4); draft descriptions regarding rent restoration relating to two properties (4520-26 S Drexel Boulevard; 6749-59 S Merrill Avenue) (.2); email correspondence with K. Duff regarding rent restoration relating to two properties (4520-26 S Drexel Boulevard; 6749-59 S Merrill Avenue) (.2); begin preparation of email correspondence to lenders' counsel transmitting reports (.4); revise spreadsheet analysis of remaining restoration and reimbursement amounts for properties (.6); email correspondence K. Duff regarding application of utility refunds from two sold properties (5618-20 S Martin Luther King Drive, 2736-44 W 64th Street) and review of financial reporting regarding same (.3).

**Business Operations** 

1/25/2021 KMP

0.80 Work on transfers from Receiver's account to property accounts (6749-5 S Merrill Avenue; 4520-26 S Drexel Boulevard) for restoration and communicate with K. Duff and E. Duff regarding same (6749-59 S Merrill Avenue; 4520-26 S Drexel Boulevard) (.4); finalize and forward December schedules of receipts and disbursements to E. Duff (.4).

**Business Operations** 

ED

4.20 Revise drafts of email correspondence to lenders' counsel transmitting reports to reflect updates (.8); prepare and send email messages to lenders' counsel with September 2020 accounting reports (1.7); review and analysis of financial reporting from property managers for October, November, and December 2020 to be used in preparation of fourth quarter accounting reports (1.3) and email correspondence with accountants and J. Rak (.4).

Kevin B. Duff, Receiver Page 15

Date Indiv Hours Description

**Business Operations** 

1/25/2021 JRW

0.90 Attention to pending housing court matters in preparation for upcoming hearing (6217-27 S Dorchester Avenue; 638-40 N Avers Avenue; 7600-10 S Kingston Avenue, 7237-43 S Bennett Avenue) (.4); related exchange of correspondence with inspector (6217-27 S Dorchester Avenue; 638-40 N Avers Avenue; 7600-10 S Kingston Avenue, 7237-43 S Bennett Avenue) (.1); exchange correspondence with corporate counsel (6217-27 S Dorchester Avenue: 638-40 N Avers Avenue: 7600-10 S Kingston Avenue. 7237-43 S Bennett Avenue) (.2); exchange correspondence with K. Duff regarding property (638-40 N Avers Avenue) (.2).

**Business Operations** 

1/26/2021 KMP

0.30 Review funds request from property manager for management expenses for properties (638-40 N Avers Avenue; 1401 W 109th Place) and communicate with K. Duff regarding same.

**Business Operations** 

1/27/2021 KMP

0.40 Prepare form for funds transfer to financing company for payment of insurance premium installment and communicate with bank representative and K. Duff regarding same.

**Business Operations** 

AW

0.30 Review new orders regarding multiple properties and update docket (2514-2520 East 77th Street; 7656-58 S Kingston Avenue; 7109-19 S Calumet Avenue; 2527-29 E 76th Street; 7600-10 S Kingston Avenue; 2804 W 64th Street; 5618-20 S Martin Luther king Drive; 416-24 E 66th Street).

**Business Operations** 

**JRW** 

0.80 Review administrative court orders (7600-10 S Kingston Avenue; 7656-58 S Kingston Avenue; 65-5458 S Vernon Avenue; 7109-19 S Calumet Avenue; 5618-20 S Martin Luther King Drive, 6356 S California Avenue) and related attention to docketing (.3); exchange correspondence with property manager, K. Duff and A. Porter regarding results of city inspection (6217-27) S Dorchester Avenue) (.4); related email exchange with city attorney (6217-27 S Dorchester Avenue) (.1).

**Business Operations** 

1/28/2021 JRW

1.10 Exchange correspondence with A. Porter and property manager regarding payment of administrative judgment (7024-32 S Paxton Avenue)(.1); related research regarding status of administrative proceedings (7024-32 S Paxton Avenue; 7109-19 S Calumet Avenue) (.5); check for updates from City of Chicago Administrative Hearings Department (.1); email exchange with A. Porter and J. Rak regarding lien waivers (4611-17 S Drexel Boulevard; 7024-32 S Paxton Avenue) (.1); exchange correspondence with K. Duff and A. Porter regarding pending actions against sold properties

(7656-58 S Kingston Avenue; 6554-58 S Vernon Avenue; 6356 S California Avenue; 5618-20 S Martin Luther King Drive) (.2); exchange correspondence with J. Rak and K. Duff regarding utility upgrade (6250 S Mozart Street) (.1).

**Business Operations** 

1/29/2021 KMP

0.40 Study documentation from finance company, prepare chart detailing payments for insurance premium financing, and forward to K. Duff.

**Business Operations** 

SUBTOTAL: [39.40 11416.00]

Case Administration

1/22/2021 SZ

0.50 EquityBuild website update and communication with IT consultant about the same.

Case Administration

1/27/2021 AW

0.20 Attention to administrative orders and correspond with J. Wine regarding docketing issues.

Case Administration

SUBTOTAL: [ 0.70 83.00]

#### Claims Administration & Objections

1/4/2021 JR

6.20 Confer with A. Porter regarding the claims process (2.3); organize and research property information related to original EquityBuild purchase dates, recording dates, purchase price, EquityBuild debt and mechanic's lien regarding properties in receivership and previously sold and update EquityBuild portfolio spreadsheet (3.9).

Claims Administration & Objections

JRW 6.90 Review and revise reply to eleventh sales motion and related correspondence and drafts of same (7237-43 S Bennett Avenue) (.6); review proposed order granting eleventh sales motion (7237-43 S Bennett Avenue) (.1); telephone conference with A. Watychowicz regarding claims review (7625-33 S East End Avenue; 7201 S Constance Avenue) and related email to team (.2); review suggested revisions to claims process outline and related correspondence with M. Rachlis and K. Duff regarding same (.4); study claims against property and update mortgagee spreadsheet (7635-43 S East End Avenue) (2.5); study claims against property and update mortgagee spreadsheet (7750-58 S Muskegon Avenue) (3.1).

Claims Administration & Objections

Kevin B. Duff, Receiver Page 17

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

1/4/2021 AW

0.30 Respond to claimant regarding proposed teleconference with K. Duff and J. Wine (.1); attention to email regarding change of scheduled video call (.1); call with J. Wine regarding scheduled claims call and review of claims against Receivership property (7201 S Constance Avenue) (.1).

Claims Administration & Objections

AEP 2.00 Teleconferences with J. Porter and J. Rak regarding overview of claims analysis, assembly of documents relevant to claims process, including administrative and housing court documentation, mechanic's lien documentation, mortgages, settlement statements, and other paperwork, reorganization of all property folders, and creation of updated spreadsheet.

Claims Administration & Objections

JP 2.00 Teleconferences with A. Porter and J. Rak regarding overview of claims analysis, assembly of documents relevant to claims process, including administrative and housing court documentation, mechanic's lien documentation, mortgages, settlement statements, and other paperwork, reorganization of all property folders, and creation of updated spreadsheet.

Claims Administration & Objections

MR 1.60 Attention to status on claims and work on claims outline.

Claims Administration & Objections

1/5/2021 KMP 0.60 Prepare correspondence to all known claimants transmitting Receiver's reply in support of eleventh sales motion (7237-43 S Bennett Avenue).

Claims Administration & Objections

JRW 5.00 Exchange correspondence with document vendor regarding claims document transfer (.2); work with A. Watychowicz on analysis of claims (7201 S Constance Avenue) (.2); study claims against property (7750-58 S Muskegon Avenue) and update claims analysis spreadsheet (1.8); confer with A. Watychowicz regarding proposed order and feasibility of email distribution lists for tranches (.3); study revisions and comments on claims process outline, additional revisions in response to comments and circulate same to claimants' counsel and SEC (2.1); attention to claimant inquiries (.2); email exchange with claimants' counsel regarding request for records (.2).

Claims Administration & Objections

4.80 Communicate with K. Pritchard regarding service of documents on claimants (.1); call with J. Wine regarding proposed discovery and claims process solution, possible updates to databases for online vendors, and group emailing (.2); draft email to claimants regarding discovery and claims process (.2); start review of claims submitted against Receivership property (7201 S Constance) and identify claims against property (4.3).

Claims Administration & Objections

1/5/2021 AEP

1.40 Review list of properties for which deeds and/or EBF mortgages are missing, research files to locate missing documentation, and create list of additional paperwork needed to finalize first step of claims analysis.

Claims Administration & Objections

MR 1.20 Review and follow up on claims outline and exchanges with J. Wine and K. Duff (1.0); attention to issues on document library (.2).

Claims Administration & Objections

1/6/2021 JR

4.00 Review claims process and update mortgagee claim information for property (7201 S Constance Avenue; 7625-33 S East End Avenue) (3.5); exchange correspondence with A. Porter regarding mortgagee claim information for property (7201 S Constance Avenue; 7625-33 S East End Avenue) (.5).

Claims Administration & Objections

JRW 5.00 Conference call with claimants' counsel and SEC regarding claims process (1.4); exchange correspondence with claimant's counsel regarding claims against properties (6749-59 S Merrill Avenue; 7110 S Cornell Avenue) (.1); exchange correspondence with claims vendor regarding document transfer (.2); videoconference with A. Porter, J. Porter, K. Duff, and A. Watychowicz regarding claims analysis (1.5); review proof of claim submitted against property (6949-59 S Merrill Avenue) (.5); attention to responding to claimant inquiries (.7); draft proposed email to claimants forwarding confidentiality anddocument orders (.5); email exchange with claims vendor regarding status of project (.1).

Claims Administration & Objections

AW 2.40 Video call regarding review of claims (1.5); attention to emails from claimant forwarding documents, review claim and documents communicate with J. Wine regarding same, and email response to claimant (.4); communicate with claims vendor regarding email project (.1); work with J. Wine on draft email to claimants regarding access to claims and discovery process (.4).

Claims Administration & Objections

AEP 1.50 Teleconference with team to discuss claims processing, legal issues associated therewith, and approach to analysis.

Claims Administration & Objections

JP 1.00 Teleconference with team to discuss claims processing, legal issues associated therewith, and approach to analysis.

Date Indiv Hours Description Claims Administration & Objections 1/6/2021 MR 1.50 Attention to meeting on claims related issues. Claims Administration & Objections 1/7/2021 JR 6.10 Review proof of claims and update mortgagee claim information for properties (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue: 7947-49 S Essex Avenue) (5.9): telephone call with J. Wine regarding claim updates (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue: 8047-55 S Manistee Avenue: 7947-49 S Essex Avenue) (.2). Claims Administration & Objections **JRW** 4.80 Review redlines of draft email to claimants forwarding confidentiality and document orders and further revise to incorporate comments regarding same (.6); email exchange with SEC (.1); draft email to court's clerk regarding entry of proposed order (.1) and related communications with K. Duff and M. Rachlis regarding same (.1); exchange correspondence with A. Watychowicz regarding compilation ofemail service lists by claims vendor (.1); revise claims process outline to set forth disputed issues (1.6); video-conference with K. Duff and M. Rachlis regarding claims process (1.8); confer with J. Rak regarding claims analysis (.2); further revision to claims process outline and related correspondence to SEC (.2). Claims Administration & Objections AW 0.60 Attention to email from claimant regarding claim and direct him to updated status report (.1); follow up regarding email to claimants regarding access to claims and discovery process (.1); multiple email exchanges and calls regarding primary and secondary emailproject and proposed statement of work (.4). Claims Administration & Objections MR 2.50 Follow up conference on claims process and issues (1.9); review materials regarding same (.6). Claims Administration & Objections 1/8/2021 JR 5.60 Review proof of claims and update mortgagee claim information for property (7750-58 S Muskegon Avenue) (2.5); telephone call with J. Wine regarding claims process (.8); zoom conference with team regarding claims (2.3). Claims Administration & Objections 4.90 Confer with A. Watychowicz regarding claims review (.1); work with J. Rak on **JRW** review procedures (.8); confer with claims vendor regarding access credentials (.1); continued analysis of claims and update spreadsheets (3074)

E Cheltenham Place; 7625-33 S East End Avenue; 7635-43 S East End

Date	Indiv Hours		<u>Description</u>			
			Avenue; 7750-58 S Muskegon Avenue; 7201 SConstance Avenue) (1.2); videoconference with K. Duff, A. Porter, M. Rachlis, J. Porter, J. Rak and A. Watychowicz regarding claims analysis (2.3); conference with K. Duff regarding claims process (.4).			
			Claims Administration & Objections			
1/8/2021	AW	2.50	Work with IT consultant on continued issue with access to executed contracts stored online (.2); video call regarding review of claims (2.3)			
			Claims Administration & Objections			
	AEP	1.00	Conference with J. Porter regarding development of master spreadsheet containing all relevant data points for each property ever owned by EquityBuild.			
			Claims Administration & Objections			
	MR	2.00	Participate in meeting on claims with receivership team.			
			Claims Administration & Objections			
	JP	2.00	Conference call with team to further analyze various types of claims submitted by investor lenders and to create a written procedure to guide resolution of all claims.			
			Claims Administration & Objections			
1/9/2021	AEP	2.30	Teleconference with team to analyze various types of claims submitted by investor lenders and to create written procedures to guide resolution of same.			
			Claims Administration & Objections			
	MR	3.00	Attention to claims and related issues and communicate with K. Duff and A. Porter and receivership team.			
			Claims Administration & Objections			
1/11/2021	ED	1.10	Prepare descriptive summary of method of calculation of reimbursable amount with respect to a property (638-40 N Avers Avenue) to respond to inquiry from Lender's counsel (.9); email correspondence with K. Duff regarding same (638-40 N Avers Avenue) (.2).			
			Claims Administration & Objections			
	JR	1.60	Work with J. Wine regarding review of claimant forms (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue).			

Claims Administration & Objections

1/11/2021 JRW

5.80 Conference with J. Rak regarding claims review process and related training on database and procedures (1.5); begin review of claims against properties (7301-09 S Stewart Avenue; 7500-06 S Eggleston Avenue; 3030-32 E 79th Street) and prepare notes regarding same (3.7); revisions to claims process outline (.2); exchange correspondence with claimants' counsel regarding revised claims process outline and claims against property (6949 S Merrill) (.2); related conference with J. Rak and update master claims spreadsheet (6749-59 S Merrill avenue; 6949-59 S Merrill Avenue) (.2).

Claims Administration & Objections

AEP 0.30 Teleconference with K. Duff regarding claims issue.

Claims Administration & Objections

MR 0.40 Conference with K. Duff regarding claims process and resolution of issues of claims.

Claims Administration & Objections

1/12/2021 JR 2.60 Exchange correspondence with J. Wine regarding proof of claims process and software related issues (.5); review proof of claims and draft notes (2.1).

Claims Administration & Objections

JRW 4.30 Continued analysis of claims against properties (7301-09 S Stewart Avenue; 7500-06 S Eggleston Avenue; 3030-32 E 79th Street) and draft memorandum regarding same (3.3); confer with J. Rak and S. Zjalic regarding claims review (.6); exchange correspondence with claims document vendor regarding claim forms (.1); telephone conference and follow up emails to claims vendors regarding transfer of documents (.2); confer with A. Watychowicz regarding claimant inquiry (.1).

Claims Administration & Objections

1/13/2021 JRW

2.50 Correspond with claims vendor regarding claims documentation (.1); confer with J. Rak regarding claims review process and related revision of spreadsheet (.7); exchange correspondence with K. Duff regarding vendor statement of work and related review of revisions to same (.3); exchange correspondence with A. Porter regardingclaims review and related review of claims data (.5); study proof of claim and supporting documentation submitted by claimant and related analysis to K. Duff (.7); exchange correspondence with counsel for tenant regarding attorneys lien (7110 S Cornell Avenue) and related review of records (.2).

Claims Administration & Objections

1/14/2021 JRW

3.00 Exchange correspondence with K. Duff regarding claim submitted by claimant (.2); work with J. Rak on claims review chart (.1); update chart of claims against properties (7301-09 S Stewart Avenue;7500-06 S Eggleston Avenue; 3030-32 E 79th Street) (1.3); telephone conference with claimant and K. Duff regarding status of matterand claims process (.8); confer with claims vendor regarding claimant's proof of claim (.1); exchange correspondence with claims vendor regarding estimate (.1); telephone conference with tenant's counsel (7110 S Cornell Avenue) (.1); related telephone conference with K. Duff and compilation of records for same (7110 S Cornell Avenue) (.3).

Claims Administration & Objections

1/15/2021 JR

2.80 Review proof of claims (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue).

Claims Administration & Objections

JRW 2.90 Study correspondence and license agreement from EquityBuild vendor and related preparation of chronology and email exchange with K. Duff (1.4); confer with M. Rachlis regarding statement of work from documents vendor and revise same (.5); confer with J. Rak regarding claims analysis (.2) and related review and summary of claim submitted by claimant (7301-09 S Stewart Avenue; 7500-06 S Eggleston Avenue; 3030-32 E 79th Street) (.8).

Claims Administration & Objections

JP 3.00 Review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (6160-6212 S Martin Luther King Drive).

Claims Administration & Objections

MR 4.40 Review recent version of claims process (.4); participate in call regarding claims process with K. Duff and J. Wine (1.0); attention to database vendor issues and conference with J. Wine (.5); research regarding claims process (2.5).

Claims Administration & Objections

1/18/2021 JR

6.10 Review email from J. Wine and notes regarding proof of claim forms and exchange correspondence regarding same (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue) (.4); review proof of claim forms and update claims review spreadsheet (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue) (5.4); further correspondence with J. Wine relating to claims and resolution of several questions and issues (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex

Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue) (.3).

Claims Administration & Objections

1/18/2021 AW

1.00 Correspond with K. Duff and J. Wine regarding forms forwarded by claimant (.1); review claim and supporting documents and communicate with J. Wine regarding proposed revisions to masterclaims list (.4); respond to claimants' emails (.2);work with IT consultant to regain access to executed contracts (.1); research and communicate with J. Wine regarding former EquityBuild database (.2).

Claims Administration & Objections

JRW 1.50 Attention to claimant inquiries (.1); conferwith A. Watychowicz regarding statement of work from document vendor (.1); confer with A. Watychowicz regarding EquityBuild documents and related correspondence to counsel for claimants (.4); confer with K. Duff regarding statement of work from document vendor and related exchange of correspondence with vendor (.3); study claimant's claim submission and related correspondence with J. Rak regarding analysis and A. Watychowicz regarding necessary updates to master spreadsheet (.6).

Claims Administration & Objections

JP 7.00 Review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (1700-08 W Juneway Terrace) (2.0); review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (5450-52 S Indiana Avenue) (2.2); review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (7749-59 S Yates Boulevard) (2.8).

Claims Administration & Objections

1/19/2021 JR 0.60 Confer with A. Watychowicz regarding electronic organization of property reports for lenders.

Claims Administration & Objections

AW 0.50 Respond to emails from claimants (.1); communicate with K. Duff and J. Wine regarding timing of claims process (.1); start research regarding email group options and communicate with IT consultant regarding same (.3).

Claims Administration & Objections

JRW 4.40 Correspondence with K. Duff regarding claimant inquiry (.3); review revised vendor statement of work and related correspondence (.3); review EBF mortgagee spreadsheets and related correspondence with J. Porter (.5); correspondence with A. Porter regarding claims analysis (.2); exchange correspondence with claimants' counsel regarding EquityBuild documents (.2); correspondence with K. Duff regarding vendor statement of work (.1);

review E. Duff analysis of institutional lender debt (.2); update EBF mortgagee spreadsheets (7750 S Muskegon) (.4); review revisions to claims processoutline from claimants' counsel (1.9); email exchange with claimants' counsel regarding revised standard discovery requests and additional revision of same (.3).

Claims Administration & Objections

1/19/2021 JP

3.60 Review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (701-13 S 5th Avenue) (1.2); review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (6437-41 S Kenwood Avenue) (1.5); gather deed document numbers, amounts, and dates in order to add to the master organizational EB portfolio (.9).

Claims Administration & Objections

MR 1.90 Work to review and comment on issues on claims process (1.5); attention to communications from institutional investor regarding claims issues (.4).

Claims Administration & Objections

1/20/2021 JR

6.60 Review proof of claims and update claims review chart regarding same (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue).

Claims Administration & Objections

SZ 0.70 Work with J. Wine regarding review of Chicago Capital Fund I claims.

Claims Administration & Objections

AW 0.40 Draft email to claimant regarding recently sold property (1700-08 W Juneway Terrace) (.1); email exchanges with claims vendorand K. Duff regarding proposed project, revisions to statement of work, and approval of same (.3).

Claims Administration & Objections

JRW 8.30 Extensive conference with K. Duff and M. Rachlis regarding claims process and related meet and confers with claimants' counsel and discovery issues (3.1); revise institutional lender claimants' proposed standard discovery request and related exchange of correspondence with claimants' counsel (.4); review comments on proposed claims process from claimants' counsel and related telephone conference with same (.5); work with K. Duff and M. Rachlis on revising draft joint status report regarding claims process (2.9); review redline of claims process from claimants' counsel (.1); correspondence circulating draft process to claimants' counsel (.2); conference with S. Zjalic regarding process for reviewing claims (.7); correspondence and telephone conference with SEC (.4).

Claims Administration & Objections

1/20/2021 JP

3.70 Review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (7109-19 S Calumet Avenue) (1.0); review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (7834-44 S Ellis Avenue) (.9); review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (4611-17 S Drexel Boulevard) (1.8).

Claims Administration & Objections

MR

6.60 Further work and review issues on edits to claims process and issues regarding same (2.9); participate in lengthy call regarding process with K. Duff and J. Wine (3.3); conference call regarding claims related discovery (.4).

Claims Administration & Objections

1/21/2021 KMP

0.20 Attention to receipt of collection notice (6250 S Mozart Street) and communications with K. Duff, A. Porter, and J. Wine regarding same.

Claims Administration & Objections

JR

4.60 Review proof of claims and update claims review chart regarding same (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue: 7947-49 S Essex Avenue).

Claims Administration & Objections

SZ

5.10 Reviewed claims related to Chicago Capital Fund I (7301-09 S Stewart Avenue; 7500-06 S Eggleston Avenue; 3030-32 E 79th Street).

Claims Administration & Objections

AW

1.70 Finalize responses to claimants and email same (.2); continue research and tests on email groups (.5); conference call with J. Wine regarding email groups (.6); attention to email lists received from claims vendor, review same, and communicate with J. Wine regarding related issues (.4).

Claims Administration & Objections

**JRW** 

6.60 Videoconference with A. Watychowicz regarding strategy for serving claimants via email distribution groups (.5); review responses to claimant inquiries (.1); correspondence with claimants' counsel and A. Watychowicz regarding revisions to standard discovery requests (.1); study claimants' proposed revisions to joint report to court regarding claims process (1.3); confer with A. Watychowicz regarding claimant email list from vendor (.1); review claims analysis (7301-09 S Stewart Avenue; 7500-06 S Eggleston

Avenue; 3030-32 E 79th Street) and related email exchange with S. Zjalic (.2); conference call with claimants' counsel and SEC regarding claims process and joint report (.9); further revision of joint report to incorporate counsel's revisions and comments and exchange numerous redlines of same with M. Rachlis, K. Duff and claimants' counsel (3.4).

Claims Administration & Objections

1/21/2021 AEP

0.50 Research EquityBuild files to assemble various publicly recorded documents, settlement statements, and other materials relevant to claims process.

Claims Administration & Objections

MR 3.60 Further attention to claims issues for submission with numerous exchanges with K. Duff and J. Wine.

Claims Administration & Objections

1/22/2021 JR

1.70 Review proof of claims and update claims review chart regarding same (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue) (1.5); exchange correspondence with S. Zjalic and J. Wine regarding same (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue (.2).

Claims Administration & Objections

SZ 0.10 Reviewed claims related to Chicago Capital Fund I (7301-09 S Stewart Avenue; 7500-06 S Eggleston Avenue; 3030-32 E 79th Street).

Claims Administration & Objections

4.30 Revisions to exhibits to joint status report and email J. Wine about same (.3); review joint report and address issue of pending motions (.2); work with J. Wine to finalize joint status report: revisions to report and exhibits, attention to email exchanges regarding revisions from all counsel signing report, multiple calls and email exchanges regarding revisions and finalization, resolve issue of service, final revisions to status report and exhibits, and file with court (1.9); review and work on possible access to EquityBuild documents (.9); communicate with database vendor regarding transfer of files from claims vendor and follow up call with J. Wine regarding same (.2); research pst files and Receiver's emails regarding communications and claims of former EquityBuild employee (.3); review of documents production and detailed email to counsel regarding same (.5).

Claims Administration & Objections

MR

1/22/2021 JRW

7.70 Research and correspond with K. Duff regarding claimants (.1); confer with A. Watychowicz regarding spreadsheet from claims vendor and process for updating claimant information (.3); correspond with claimant, K. Duff and M. Rachlis regarding claim against property (638-40 S Avers Avenue) (.3); revisions to standard discovery requests for inclusion in joint status report and related correspondence with claimants' counsel (.4); extensive revision of joint report regarding claims process and pending motions, numerous exchanges of correspondence and redlined drafts internally and with claimants' counsel and SEC and finalize and file same (6.6).

Claims Administration & Objections

3.50 Work on various drafts of joint status reports and discovery requests and confer on various issues with J. Wine and K. Duff.

Claims Administration & Objections

1/25/2021 SZ 4.60 Reviewed claims related to Chicago Capital Fund II (2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue).

Claims Administration & Objections

JR 4.80 Review proof of claims and update claims review chart regarding same (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue) (4.8).

Claims Administration & Objections

AW 0.30 Attention to email from Judge Lee's courtroom deputy regarding claims order and call with J. Wine regarding same (.1); revise proposed email to claimants and email counsel regarding same (.2).

Claims Administration & Objections

JRW 1.30 Study and update claims review spreadsheet (.5); related communications with S. Zjalic and J. Rak (.2); exchange correspondence with court clerk regarding claims process (.1); related review of draft email to claimants (.1); exchange correspondence with K. Duff and K. Pritchard regarding claim (.2); research and correspond with K. Duff regarding confidentiality issue (.2).

Claims Administration & Objections

JP 2.40 Review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (6250 A Mozart Street) (1.2); review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (7255-57 S Euclid Avenue) (1.2).

Claims Administration & Objections

1/25/2021 MR 0.40 Attention to various claims related items on upcoming hearing.

Claims Administration & Objections

1/26/2021 JR

4.20 Review proof of claims and update claims review chart regarding same (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue).

Claims Administration & Objections

SZ 3.10 Continued to review claims related to Chicago Capital Fund II (2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue).

Claims Administration & Objections

AW 1.40 Attention to email from K. Duff regarding potential claimants, review submitted claims, and make appropriate notes in master claims list (.4); communicate with K. Duff regarding claims vendor file (.1); attention to emails from claimants, review their claims, draft responses (.4); review files preserved by IT consultant, upload same to shared file, and communicate with J. Wine regarding same (.3); communicate with IT consultant regarding new email project (.2).

Claims Administration & Objections

JRW 2.10 Attention to claimant inquiries (.1); review EB documents (.4); factual research regarding claimants (.4); review and analyze proofs of claim against property (7927-49 S Essex) and related update of claims review chart (1.1); exchange correspondence relating to claimants' counsel request for records (.1).

Claims Administration & Objections

JP 5.70 Review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (5955 S Sacramento Avenue) (.9); review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (6001-05 S Sacramento Avenue) (.8); review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (7026-42 S Cornell Avenue) (1.2); review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (7237-43 S Bennett Avenue) (1.0); review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (8100 S Essex Avenue) (1.8).

Claims Administration & Objections

1/27/2021 JR

5.10 Review proof of claims and update claims review chart regarding same (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue).

Claims Administration & Objections

AW 2.60 Call with J. Wine regarding claimants' email contact sheets (.1); draft email response to potential claimant (638-40 N Avers Avenue) and attention to multiple comments and revisions to same (.2); attention to claims containing wrong supporting documents and reach out to claims vendor regarding the issue (.4); review email sheets for properties (3074 Cheltenham Place; 7625-33 S East End Avenue; 7635-43 S East End Avenue; 7750-58 S Muskegon Avenue; 7201 S Constance Avenue) and communicate with J. Wine regarding duplicate claim (1.2); communicate with accountant regarding claimants' entities issues (.1); respond to claimant's inquiry regarding sold property (11117-11119 S Longwood Drive) (.1); video call with J. Wine regarding access to online database (.3); follow up with IT consultant regarding email project and additional keywords searched requested by J. Wine (.1); communicate with K. Duff regarding records

received from claims vendor and processing of same (.1).

Claims Administration & Objections

4.10 Correspondence with K. Duff regarding analysis of emails relating to claimant (.3); attention to claimant inquiry (.3); videoconference with A. Watychowicz regarding EB document vendors (.5) and continued review of EB records (.6); continued review ofclaims against property (7927-49 S Essex Avenue) (1.2); study entries on review spreadsheet and related communications with S. Zjalic (.6); email exchange with claims vendor and A. Watychowicz regarding claims documentation and related review of database (.2); correspondence from court clerk regarding proposed order and related exchange with K. Duff and M. Rachlis (.2); exchange correspondence with claimants' counsel regarding procedures and timing for sharing claims and EquityBuild documents (.2).

Claims Administration & Objections

MR 0.40 Attention to various claims issues regarding upcoming hearing.

Claims Administration & Objections

1/28/2021 JR

5.60 Review proof of claims and update claims review chart regarding same (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue: 7947-49 S Essex Avenue).

Claims Administration & Objections

1/28/2021 AW

4.20 Communicate with K. Duff and J. Wine regarding email from claimant (.1); review and email communications with J. Wine regarding proposed updates to master claimslist and detailed summary (4.1).

Claims Administration & Objections

SZ 3.20 Continued to review claims related to Chicago Capital Fund II (2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue).

Claims Administration & Objections

JRW 2.20 Draft response to court clerk regarding proposed order and revisions thereto (.2); confer with A. Watychowicz and related correspondence to claimant's counsel regarding EB documents (.3); exchange correspondence with claims vendor regarding claims documentation (.1); work with S. Zjalic and J. Porter on claims review andrelated emails exchange with A. Watychowicz (.9); attention to claimants' inquires (.2); review claims review spreadsheet and proofs of claim (7927-49 S Essex Avenue) and related correspondence with A. Watychowicz (.5).

Claims Administration & Objections

JP 4.80 Review lender statement of accounts, full client history, and mortgagee spreadsheet and complete claims analysis for property (11117-11119 S Longwood Drive) (1.0); gather deed document numbers, amounts, and dates in order to add to the master organizational EB portfolio (3.8).

Claims Administration & Objections

MR 3.90 Conference with K. Duff regarding upcoming hearing and claims issues (.8); further preparation for hearing and review of prior briefs and transcripts (2.8); attention to issues on request for information regarding property sale (.2); attention to communication regarding claims documentation (.1).

Claims Administration & Objections

1/29/2021 JR

6.70 Review proof of claims and update claims review chart regarding same (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue).

Claims Administration & Objections

AW 3.40 Continued review and email communications with J. Wine regarding proposed updates to master claims list and detailed summary (2.6); attention to email from counsel, update claimed amounts, and

communicate same to J. Wine (.2); draft email response to claimant regarding past hearing and call with J. Wine regarding same (.1); request update to claims portal (.1); attention to email from courtroom deputy regarding scheduled hearing and update docket (.1); attention to entered order changing conference ID for claimants and request update to Receivership web page (.1); call with J. Wine regarding hearing and proposed schedule (.2).

Claims Administration & Objections

1/29/2021 JRW

4.90 Prepare for hearing before Judge Lee on claims process (.4); related conference with M. Rachlis and K. Duff regarding hearing preparation (1.0); telephone conference with SEC (.3); appearance at hearing before Judge Lee regarding claims process (1.6); work with A. Watychowicz and S. Zjalic regarding claims review and reconciliation of records spreadsheet (.5); attention to inquiry from claimant's counsel (.1); attention to additional inquiries from claimants (.2); correspondence from court clerk regarding revision of proposed order (.1); research regarding EB documents (.7).

Claims Administration & Objections

MR 4.20 Prepare for upcoming hearing (1.0); participate in meetings regarding hearing with K. Duff and J. Wine (1.0); conference with SEC (.3); attend hearing (1.6); follow up regarding hearing with K. Duff (.3).

Claims Administration & Objections

SUBTOTAL: **2**97.50 62946.001

Status Reports

1/4/2021 KMP 0.50 Work with J. Rak on compiling information for 4Q2020 status report.

Status Reports

JR 0.50 Review emails from K. Duff regarding requested information for 4th quarter 2020 status report and provide same.

Status Reports

1/5/2021 KMP 0.20 Compile information relating to Receivership accounts for 4Q2020 status report.

Status Reports

<u>Date</u>	Indiv	<u>Hours</u>	Description
1/13/2021	KMP	1.80	Work on financial exhibits for fourth quarter 2020 status reports.
			Status Reports
	JR	1.40	Review email from J. Wine regarding 4th quarter status report and respond accordingly (.1); prepare requested information related to 4th quarter status report (1.3).
			Status Reports
	JRW	0.60	Begin drafting 4Q 2020 status report (.4); related correspondence with J. Rak, K. Pritchard, E. Duff and K. Duff (.2).
			Status Reports
1/14/2021	KMP	2.10	Further work on financial exhibits for fourth quarter 2020 status reports.
			Status Reports
	JR	0.70	Finalize requested items for 2020 4th status report and exchange correspondence with J. Wine regarding same (.5); review email from J. Wine and provide further requested items related to same (.2).
			Status Reports
	JRW	0.60	Work on 4th Q 2020 status report and related review of exhibits to same.
			Status Reports
1/15/2021	KMP	3.30	Further work on financial exhibits for fourth quarter 2020 status reports.
			Status Reports
1/16/2021	JRW	1.30	Drafting of 4th quarter 2020 status report.
			Status Reports
1/17/2021	JRW	0.60	Continued drafting of 4th Quarter 2020 status report.
			Status Reports
1/18/2021	ED	0.20	Email correspondence to J. Wine to provide requested information regarding restoration and reimbursement amounts for status report, and review of related documentation.
			Status Reports
	JRW	3.10	Continued drafting of 4th Quarter 2020 status report (2.9); related correspondence with E. Duff regarding restoration (.1) and with insurance defense counsel regarding status of pending matters (.1).
			Status Reports

<u>Date</u>	<u>Indiv</u> l	Hours	Description
1/19/2021	KMP	0.20	Communication with J. Wine regarding revisions to financial exhibits for status report.
			Status Reports
	AW	0.30	Research and communicate with J. Wine regarding email traffic in Receiver's and claim's account to include in fourth quarter 2020 status report.
			Status Reports
	JRW	2.20	Attention to preparing fourth quarter 2020 status report and exhibits to same (2.0); correspondence with accountant regarding status update (.1); correspondence with E. Duff regarding funds restoration (.1).
			Status Reports
1/20/2021	MR	0.60	Review draft status report.
			Status Reports
1/25/2021	KMP	0.20	Review financial exhibits to fourth quarter status report and communicate with J. Wine regarding same.
			Status Reports
	AW	0.20	Review discovery folder and follow up with J. Wine regarding lack of subpoenas issued between Octoberand December 2020.
			Status Reports
	JRW	3.20	Work with K. Duff and M. Rachlis on revision and drafting of fourth quarter 2020 status report (3.1); related exchange of correspondence with counsel (.1).
			Status Reports
	MR	1.00	Attention to status reports and work on same.
			Status Reports
1/26/2021	KMP	0.20	Communicate with K. Duff and J. Wine regarding accounting issues relating to fourth quarter status report and revise financial schedule.
			Status Reports
	JRW	1.00	Revisions to status report and exhibits (.6); exchange correspondence with K. Duff regarding insurance recovery (638-40 N Avers Avenue) (.4).
			Status Reports

Date	e Ir	ndiv Ho	urs De	escription					
1/27	/2021	KMP	KMP 0.60 Finalize exhibits for 4Q2020 status report and forward to J. Wine.						
				Status Reports					
		JRW	1.60	exchange correspondence with E. Duff regarding information for status eport (.1); additional revisions tofourth quarter status report and exhibits 1.2); telephone conference with SEC (.3).					
				Status Reports					
		MR	0.20	Attention to status report.					
				Status Reports					
1/28	3/2021	JRW	0.40	Further revision of fourth quarter status report (.3); related correspondence with E. Duff (.1).					
				Status Reports					
SUBTOTAL:				[28.80 6284.00]					
Tax Issues			_						
1/8/2	2021	KMP	0.30	Review notice of tax delinquency and most recent tax filings for entity (1516 E 85 Pl Assoc) and communicate with K. Duff and A. Porter regarding same.					
				Tax Issues					
1/11	/2021	KMP	0.30	Telephone conference with accountant regarding suggested responses to recently received tax notices (4533-47 S Calumet Avenue; 3400 Newkirk), and communicate with K. Duff and J. Rosen Wine regarding same.					
				Tax Issues					
1/22	2/2021	AW	0.10	Attention to received tax forms from bank and email K.Pritchard copies of same.					
				Tax Issues					
1/28	3/2021	KMP	0.30	Exchange correspondence with tax administrator forwarding forms 1099 for Receiver's accounts (.1) and advising of insurance proceeds for claim relating to property (.2).					
				Tax Issues					
1/29	)/2021	KMP	0.40	Exchange correspondence with tax administrator regarding request for information relating to issuance of forms 1099 and compile and forward schedules of receipts and disbursements for their review.					
				Tax Issues					

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<u>Date</u>	Indiv Hours Description		
SUBTOTAL:		[ 1.40	196.00]
		425.50	\$93.773.00

Other Charges			
	Description	_	
Asset Analysis & Recovery			
	Process Server fees for service of subpoena		371.25
SUBTOTAL:		[	371.25]
Business Operations			
	Photocopies for January 2021		3.40
	Software license fees for January 2021 (Summit Hosting, \$266.50; Google Suite, \$96.37)		362.87
	Online research for January 2021		515.47
SUBTOTAL:		[	881.74]
Total Other Charges			\$1,252.99

Summary of Activity

Sullille	ary or Activity	
	Hours	Rate
Jodi Wine	108.40 26	\$28,184.00
Ania Watychowicz	32.90 14	10.00 \$4,606.00
Julia Porter	35.20	95.00 \$3,344.00
Justyna Rak	108.20 14	10.00 \$15,148.00
Kathleen M. Pritchard	29.30 14	10.00 \$4,102.00
Stoja Zjalic	18.20 11	10.00 \$2,002.00
Andrew E. Porter	21.00 39	90.00 \$8,190.00
Ellen Duff	22.50 39	90.00 \$8,775.00
Michael Rachlis	49.80 39	90.00 \$19,422.00

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# **SUMMARY**

Legal Services	\$93,773.00
Other Charges	\$1,252.99
TOTAL DUE	\$95,025.99

# Case: 1:18-cv-05587 Document #: 993-1 Filed: 05/17/21 Page 92 of 162 PageID #:32380 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

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

May 17, 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.6622131

Legal Fees for the period February 1-28, 2021 \$48,269.00

Expenses Disbursed \$1,979.74

Due this Invoice \$50,248.74

<u>Date</u>	<u>Indiv</u> <u>H</u>	<u>lours</u>	Description		
Accounting/Auditing	<u> </u>	_			
2/9/2021	KMP	0.20	Update account ledgers to reflect recent transactions.		
			Accounting/Auditing		
2/23/2021	KMP	1.10	Prepare January statements of receipts and disbursen accounts.	nents for Rece	eiver's
			Accounting/Auditing		
2/26/2021	KMP	0.40	Work with K. Duff to prepare deposit to receiver's account ledgers (.2).	unt (.2); upda	te
			Accounting/Auditing		
SUBTOTAL:				[ 1.70	238.00]
Asset Analysis & Re	ecovery				
2/4/2021	KMP	1.60	Study letter from potential asset holder regarding Recepolicies (.2); draft reply letter and prepare related chart to potential asset holder regarding Receivership assets communicate with K. Duff, J. Wine, and A. Watychowid letter to potential asset holder (.3).	t (.7); draft lett s (.4);	er
			Asset Analysis & Recovery		
	AW	1.90	Email exchanges regarding potential assets (.1); reseasupplement payment list to policy provider (1.1); reseasupplement with K. Duff regarding other potential (.3); investigation regarding potential assets (.4).	irch and	rds and
			Asset Analysis & Recovery		
	JRW	0.30	Review correspondence regarding potential asset and correspondence with K. Duff and SEC.	related	
			Asset Analysis & Recovery		
2/9/2021	AEP	1.60	Teleconference with K. Duff regarding collection of doc search e-mails of EquityBuild principals and employee relevant documentation (.7); teleconference with K. Du ownership of properties, encumbrances thereon, and p	s, and assem	ble

Date	Indiv	Hours	Description

of same in EquityBuild estate (.2); conduct preliminary research into status of ownership of properties and prepare e-mail to K. Duff summarizing initial findings (.6).

Asset Analysis & Recovery

2/24/2021 KMP

0.40 Review materials relating to motion to amend order appointing receiver (1050 8th Avenue N) and forward related testimony, orders, and link to electronic exhibit files to K. Duff.

Asset Analysis & Recovery

2/26/2021 KMP

0.40 Work with K Duff regarding preparation of subpoena and response to life insurance company.

Asset Analysis & Recovery

SUBTOTAL: [ 6.20 1304.00]

## Asset Disposition

2/1/2021 JR

2.00 Review email from A. Watychowicz regarding request for work for previously sold property (6250 S Mozart Street) and respond accordingly (.1); draft closing documents for property (7109-19 S Calumet Avenue) (1.7); review rent rolls for remaining unsold properties (638-40 N Avers Avenue; 1422-24 E 68th Street; 2800-06 E 81st Street; 4611-17 S Drexel Boulevard; 4750-52 S Indiana Avenue; 6217-27 S Dorchester Avenue; 7024-32 S Paxton Avenue; 7109-19 S Calumet Avenue; 7237-43 S Bennett Avenue; 7255-57 S Euclid Avenue; 7840-42 S Yates Avenue) and request same from property management (.2).

**Asset Disposition** 

AEP

0.80 Teleconference with prospective purchaser of receivership property (1102 Bingham (Houston, TX)) regarding application for zoning relief and other administrative issues (.6); teleconference regarding replacement of property management firm (7109-19 S Calumet Avenue) (.2).

**Asset Disposition** 

2/2/2021 JR

2.50 Discuss single family home production of document status and draft same (single family).

**Asset Disposition** 

AEP

2.40 Conference with J. Rak regarding all outstanding items associated with all properties currently subject to motions to confirm and strategy for preparation of closing documents associated with prospective conveyance of single-family home portfolio (single family) (2.1); teleconference with prospective purchaser of single-family home portfolio regarding negotiation of inspection contingency in language of purchase and sale agreement

(single family) (.3).

**Asset Disposition** 

2/3/2021 JR

6.00 Update rent rolls for unsold properties in electronic property folders for unsold properties (638-40 N Avers Avenue; 1422-24 E 68th Street; 2800-06 E 81st Street; 4611-17 S Drexel Boulevard; 4750-52 S Indiana Avenue; 6217-27 S Dorchester Avenue; 7024-32 S Paxton Avenue; 7109-19 S Calumet Avenue; 7237-43 S Bennett Avenue; 7255-57 S Euclid Avenue; 7840-42 S Yates Avenue) (.3); review email request from K. Duff and provide requested EquityBuild information related to all properties subject to a motion to approve and confirm sale of same (.3); draft closing documents for property (7237-43 S Bennett Avenue) (3.4); exchange correspondence with buyer's counsel requesting buyer information needed for closing (7237-43 S Bennett Avenue) (.3); review email from buyer's counsel regarding previously sold property (7600-10 S Kingston Avenue) and tenant rent credits (.1); review tenant rent accounting and exchange correspondence with property management regarding same (7600-10 S Kingston Avenue) (.6); exchange correspondence with K. Pritchard and K. Duff requesting account information for net proceeds related to remaining of unsold properties (7237-43 S Bennett Avenue; 638-40 N Avers Avenue; 7109-19 S Calumet Avenue; single family; 1102 Bingham (Houston, TX)) (.2); begin drafting closing documents for property (7255-57 SEuclid Avenue) (.6); exchange correspondence with buyer's counsel requesting buyer information required for closing (7255-57 S Euclid Avenue) (.2).

**Asset Disposition** 

AEP 0.30 Teleconference with K. Duff regarding property manager (7109-19 S Calumet Avenue) (.2); telephone conference with K. Duff regarding status of progress associated with application for zoning relief being submitted by prospective purchaser of receivership property (1102 Bingham (Houston, TX)) (.1).

**Asset Disposition** 

2/4/2021 JR

4.30 Review email from buyer and buyer's counsel related to the requested buyer information for closing (7255-57 S Euclid Avenue), update closing checklist and respond accordingly (.5); draft closing documents for property in anticipation for closing (7255-57 S Euclid Avenue)(2.9); review email from buyer's counsel regarding requested buyer information and update closing checklist, closing documents and respond accordingly regarding same (7237-43 S Bennett Avenue) (.8); review email from property management and provide requested information related to sold property (1131-41 E 79th Place) (.1).

**Asset Disposition** 

AEP 0.40 Read proposed rider submitted by prospective purchaser of single-family home portfolio, edit and revise same, and transmit to broker with explanation for refusal to make certain changes (single family).

**Asset Disposition** 

2/4/2021 MR 0.40 Attention to property (638-40 N Avers Avenue) issues (.2); attention to single family home issues (single family) (.2).

**Asset Disposition** 

2/5/2021 JR

6.20 Draft closing documents for property (1422-24 East 68th Street) in preparation for closing (3.2); exchange correspondence with buyer's counsel requesting buyer information related to closing (1422-24 East 68thStreet) (.2); exchange correspondence with the title company requesting status of earnest money for property (2800-06 E 81st Street) (.2); draft closing documents for property (4611-17 S Drexel Boulevard) in preparation for closing (2.2); exchange correspondence with buyer's counsel requesting buyer information required for closing (4611-17 S Drexel Boulevard) (.2): exchange correspondence with property management requesting updated rent rolls for unsold properties (1422-24 East 68th Street; 2800-06 E 81st Street; 4611-17 S Drexel Boulevard; 4750-52 S Indiana Avenue; 6217-27 S Dorchester Avenue; 7024-32 S Paxton Avenue; 7840-42 S Yates Avenue) (.1): review rent rolls and save in electronic files (1422-24 East 68th Street; 2800-06 E 81st Street; 4611-17 S Drexel Boulevard; 4750-52 S Indiana Avenue; 6217-27 S Dorchester Avenue; 7024-32 S Paxton Avenue; 7840-42 S YatesAvenue) (.1).

**Asset Disposition** 

AEP 0.20 Teleconference with receivership broker regarding remaining disputed issues pertaining to buyer inspection contingency rights in single-family home purchase and sale contract (single family).

**Asset Disposition** 

2/6/2021 AEP

0.60 Read and respond to e-mail from counsel for secured lenders regarding status of negotiation of purchase and sale contract associated with conveyance of single-family home portfolio (single family) (.1); prepare e-mail to counsel for all purchasers of properties in tenth sales tranche (4611-17 S Drexel Boulevard; 6217-27 S Dorchester Avenue; 7024-32 S Paxton Avenue; 7255-57 S Euclid Avenue; 1422-24 East 68th Street; 2800-06 E 81st Street; 4750-52 S Indiana Avenue; 7840-42 S Yates Avenue) regarding lack of ruling on motion to confirm and updates to due diligence materials (.2); teleconference with prospective purchaser of single-family home portfolio regarding potential modifications to contract pertaining to inspection contingency rights (single family) (.3).

**Asset Disposition** 

2/8/2021 JR

5.40 Draft closing documents for property (4611-17 S Drexel Boulevard) (2.8); change correspondence with buyer's counsel requesting review of notices to tenant letters for approval (4611-17 S Drexel Boulevard)(.1); draft closing documents for property (7840-42 S Yates Avenue) (2.3); exchange correspondence with buyer's counsel requesting various buyer information for closing (7840-42 S Yates Avenue) (.2).

#### **Asset Disposition**

2/8/2021 AEP

2.40 Prepare e-mail to property management firm requesting various updated due diligence materials for various unsold properties in tenth marketing tranche (4611-17 S Drexel Boulevard; 6217-27 S Dorchester Avenue; 7024-32 S Paxton Avenue; 7255-57 S Euclid Avenue; 1422-24 East 68th Street; 2800-06 E 81st Street; 4750-52 S Indiana Avenue; 7840-42 S Yates Avenue) due to delay in ruling on motion to confirm (.2); review notice of violation associated with single-family home property (2129 W 71st Street), update closing checklist, and coordinate with J. Wine regarding current status (.1): review all administrative orders entered on 01/28/21 in connection with receivership properties (7600-10 S Kingston Avenue; 7110 S Cornell Avenue; 638-40 N Avers Avenue; 6217-27 S Dorchester Avenue; 7237-43 S Bennett Avenue), update closing checklists and case calendar, and circulate, as necessary, to counsel for acquiring buyers (.4); review all updated due diligence materials received from property manager in connection with receivership properties (4611-17 S Drexel Boulevard; 6217-27 S Dorchester Avenue; 7024-32 S Paxton Avenue; 7255-57 S Euclid Avenue; 1422-24 East 68th Street; 2800-06 E 81st Street; 4750-52 S Indiana Avenue; 7840-42 S Yates Avenue) and circulate to counsel for corresponding prospective purchasers (.6); teleconference with property manager regarding potential transition of property management responsibilities on receivership properties (7237-43 S Bennett Avenue; 7109-19 S Calumet Avenue) to prospective new purchasers (.2); conference call with counsel for prospective purchaser of single-family home portfolio regarding potential resolution of impasse over due diligence language in form purchase and sale agreement (single family) (.6) and preparation of e-mail to receiver and receivership brokers describing impasse and soliciting input on potential solutions (single family) (.3); (continued)...

#### Asset Disposition

AEP 0.30 ...(continued); teleconference with K. Duff regarding remarketing strategy for receivership property (638-40 N Avers Avenue) (.3).

**Asset Disposition** 

2/9/2021 JR 5.30 Draft closing documents for property (7840-42 S Yates Avenue) (1.9); draft closing documents for property (7024-32 S Paxton Avenue) (3.4).

**Asset Disposition** 

AEP 0.30 Teleconference with counsel for prospective purchaser of single-family home portfolio regarding agreed changes to inspection contingency provision of purchase and sale contract (single family) (.1); teleconference with K. Duff regarding status of negotiations over purchase and sale of single-family homes (single family) (.2).

**Asset Disposition** 

2/10/2021 AEP 0.40 Prepare e-mail to receivership broker responding to inquiry regarding status of negotiation of purchase and sale agreement associated with single-family home portfolio (single family) (.2); teleconference with prospective purchaser

of receivership properties (7024-32 S Paxton Avenue; 5420 S Indiana Avenue) regarding title exception issues and estimated closing dates (.2).

**Asset Disposition** 

2/10/2021 JR

6.40 Draft closing documents for property (4750-52 S Indiana Avenue) (3.2); draft closing documents for property (6217-27 S Dorchester Avenue) (2.8); exchange correspondence with buyer's counsel requesting buyer information required to close (6217-27 S Dorchester Avenue) (.2); review email from property management providing requested closed property information (8326-32 S Ellis Avenue) (.1); follow up correspondence with A. Porter regarding updates to due diligence documents for unsold properties (638-40 N Avers Avenue; 1422-24 East 68th Street; 2800-06 E 81st Street; 4611-17 S Drexel Boulevard; 4750-52 S Indiana Avenue; 6217-27 S Dorchester Avenue; 7024-42 S Paxton Avenue; 7109-19 S Calumet Avenue; 7237-43 S Bennett Avenue; 7255-57 S Euclid Avenue; 7840-42 S Yates Avenue) (.1).

**Asset Disposition** 

2/11/2021 AEP

0.50 Teleconference with property manager regarding potential change of management at receivership property (7109-19 S Calumet Avenue) (.2); teleconference with prospective purchaser of receivership property (1102 Bingham (Houston, TX)) regarding zoning issues and other perceived obstacles to closing (.3).

**Asset Disposition** 

JR

0.50 Review 1099-s forms relating to closed properties (4533-47 S Calumet Avenue; 7442-54 S Calumet Avenue; 816-22 E Marquette Road; 7600-10 S Kingston Avenue; 7656-58 S Kingston Avenue; 7300-04 S St Lawrence Avenue; 1131-41 E 79th Place; 6250 S Mozart Street; 1700-08 W Juneway Terrace; 7701-03 S Essex Avenue) (.1); review tax bills for all properties with tax balance for 2018, 2019 and 2020 (.2); review email from K. Duff and provide requested closing dates regarding January results summary (7051 S Bennett Avenue; 8201 S Kingston Avenue; 8047-55 S Manistee Avenue; 4611-17 S Drexel Boulevard; 7749-59 S Yates Boulevard; 1131-41 E 79th Avenue; 4533-47 S Calumet Avenue; 6217-27 S Dorchester Avenue; 1414-18 East 62nd Place; 6949-59 S Merrill Avenue; 7024-32 S Paxton Avenue) (.2).

**Asset Disposition** 

2/12/2021 AEP

1.10 Teleconference with counsel for prospective purchaser of single-family home portfolio regarding purchaser's counteroffer relating to inspection contingency language and convey summary of deal status to K. Duff and receivership broker (single family) (.3); teleconference with K. Duff and receivership broker regarding relative merits of counteroffer received from prospective purchaser of single family homes (single family) (.2); telephone conference with K. Duff regarding transition of managerial responsibilities on receivership property (7109-19 S Calumet Avenue) (.1); telephone conference with K. Duff regarding options regarding re-marketing of receivership property (638-40 N Avers Avenue) and potential acceptance of backup offer (.3); revise proposed purchase and sale agreement pertaining to single-family

home portfolio and transmit same to counsel for prospective purchaser (single family) (.2).

**Asset Disposition** 

2/12/2021 JR

5.00 Draft tax transfer applications for properties (4611-17 S Drexel Boulevard; 4750-52 S Indiana Avenue; 6217-27 S Dorchester Avenue; 7024-32 S Paxton Avenue) (.9); review and draft closing documents for property in preparation for closing (6217-27 S Dorchester Avenue) (.3); exchange communication with IT and A. Porter regarding uploading of EquityBuild records and status of same (.4); exchange correspondence with accounting firm regarding 1099-s forms relating to closed properties (4533-47 S Calumet Avenue; 7442-54 S Calumet Avenue; 816-22 E Marquette Road; 7600-10 S Kingston Avenue; 7656-58 S Kingston Avenue; 7300-04 S St Lawrence Avenue; 1131-41 E 79th Place; 6250 S Mozart Street; 1700-08 W Juneway Terrace; 7701-03 S Essex Avenue) and save in electronic property folders (.3); review property tax statements (1102 Bingham (Houston, TX)) (.1); review current property tax information and payment availability from property management and provide same to K. Duff (.2); draft closing documents for property (2800-06 E 81st Street) (2.8).

**Asset Disposition** 

2/15/2021 JR

1.60 Draft closing documents (2800-06 E 81st Street) (.9); review email from property management and request property tax balancesfor all unpaid property taxes (.2); update property tax balance spreadsheet and forward same to K. Duff (.3); further correspondence with K. Duff and property management regarding upcoming payment plan arrangement for same (.2).

**Asset Disposition** 

2/16/2021 JR

1.80 Review leases, lease terms, subsidy contracts and security deposit information for properties (1422-24 East 68th Street; 2800-06 E 81st Street; 4611-17 S Drexel Boulevard) and update certified rent rolls for closing.

**Asset Disposition** 

2/17/2021 KMP

0.30 Research to identify account numbers for deposit of proceeds from upcoming property sales and exchange correspondence with J. Rak regarding same (7237-43 Bennett Avenue; 1102 Bingham (Houston, TX); 638-40 N Avers Avenue; 7109-19 S Calumet Avenue).

**Asset Disposition** 

AEP

0.90 Review proposed modified purchase and sale contract submitted by prospective purchaser of single-family home portfolio and approve execution of same by receiver (single family) (.2); teleconference with J. Rak regarding inventorying and status of all outstanding issues associated with all pending conveyances of real estate (4750-52 S Indiana Avenue; 7840-42 S Yates Avenue; 2800-06 E 81st Street; 4611-17 S Drexel Boulevard; 1422-24 East 68th Street; 7255-57 S Euclid Avenue; 6217-27 S Dorchester Avenue) (.7).

#### **Asset Disposition**

2/17/2021 JR

2.90 Conference call with A. Porter related to status of closings (638-40 N Avers Avenue; 1422-24 East 68th Street; 2800-06 E 81st Street; 4611-17 S Drexel Boulevard; 4750-52 S Indiana Avenue; 6217-27 S Dorchester Avenue; 7024-42 S Paxton Avenue; 7109-19 S Calumet Avenue; 7237-43 S Bennett Avenue; 7255-57 S Euclid Avenue; 7840-42 S Yates Avenue) (.9); review leases, subsidy contracts and update certified rent roll in preparation for closing (4611-17 S Drexel Boulevard) (1.5); review email from K. Pritchard related to bank account information for various unsold properties and update files regarding same (638-40 N Avers Avenue; 1422-24 East 68th Street; 2800-06 E 81st Street; 4611-17 S Drexel Boulevard; 4750-52 S Indiana Avenue; 6217-27 S Dorchester Avenue; 7024-42 S Paxton Avenue; 7109-19 S Calumet Avenue; 7237-43 S Bennett Avenue; 7255-57 S Euclid Avenue; 7840-42 S Yates Avenue) (.5).

## **Asset Disposition**

2/18/2021 JR

6.80 Review leases, security deposit information, subsidy contracts and update certified rent roll (4750-52 S Indiana Avenue) (1.1); review leases, security deposit information, subsidy contracts and update certified rent roll (6217-27 S Dorchester Avenue) (1.4); review leases, security deposit information, subsidy contracts and update certified rent roll (7024-32 S Paxton Avenue) (1.2); review leases, security deposit information and subsidy contracts and update certified rent roll (7255-57 S Euclid Avenue) (1.1); review leases, security deposit information and subsidy contracts and update certified rent roll (7840-42 S Yates Avenue) (.6); review leases, security deposit information and subsidy contracts, and update certified rent roll (7237-43 S Bennett Avenue) (.9); draft email to property manager requesting leases. subsidy contracts, security deposit information and corrections to leases and rent rolls for properties (1422-24 East 68th Street; 2800-06 E 81stStreet; 4611-17 S Drexel Boulevard; 4750-52 S Indiana Avenue; 6217-27 S Dorchester Avenue; 7024-32 S Paxton Avenue; 7840-42 S Yates Avenue) (.5).

#### **Asset Disposition**

2/19/2021 JR

5.30 Finalize draft email to property manager requesting leases, subsidy contracts, security deposit information and corrections to leases and rent rolls for properties (1422-24 East 68th Street; 2800-06 E 81st Street; 4611-17 S Drexel Boulevard; 4750-52 S Indiana Avenue; 6217-27 S Dorchester Avenue; 7024-32 S Paxton Avenue; 7840-42 S Yates Avenue) (.6); exchange communications with property management requesting leases, subsidy contracts, security deposit information and corrections to leases and rent rolls for properties (7237-43 S Bennett Avenue; 7255-57 S Euclid Avenue) (.4); update water applications for single family home portfolio with legal descriptions (single family) (1.2); draft zoning applications for single family home portfolio (single family) (3.1).

**Asset Disposition** 

2/22/2021 JR

2.70 Review email from property manager related to requested property information and upload to electronic files (4611-17 S Drexel Boulevard; 7840-42 S Yates Avenue; 7024-32 S Paxton Avenue) (.5); update closing documents with updated buyer information (7840-42 S Yates Avenue; 7024-32 S Paxton Avenue) (2.2).

**Asset Disposition** 

2/23/2021 AEP

1.00 Teleconference with title insurance company escrow officer regarding form of SJO instructions associated with single-family home portfolio (single family) (.2); prepare SJO instructions associated with single-family home portfolio and circulate for signatures (single family) (.1); review collection notice associated with receivership property (6250 S Mozart Street) and search records for evidence of underlying action (.1); review non-suit order entered in connection with receivership property (4611-17 S Drexel Boulevard) and update closing checklist (.1); read title commitment for receivership property (1102 Bingham (Houston, TX)), mark up title commitment to ensure timely deletion of special exceptions, and prepare worksheet of all lien claims filed against property to ensure proper payoffs at closing (.5).

**Asset Disposition** 

3.40 Review email from J. Wine and provide requested sale documents for property (6250 S Mozart Street) (.3); review email from K. Duff requesting correspondence to law firm which filed tax lien against property (1102 Bingham (Houston, TX)) and respond accordingly (.2); exchange correspondence with property management requesting property information for single family home (5437 S Laflin Street) (.1); further correspondence with property management regarding requested property information and missing items (4611-17 S Drexel Boulevard) (.2); review requested property information from property management and update closing documents and update electronic files regarding same (7024-32 S Paxton Avenue; 4750-52 S Indiana Avenue; 1422-24 East 68th Street; 7255-57 S Euclid Avenue; 7237-43 S Bennett Avenue) (2.6).

Asset Disposition

2/24/2021 JR

4.30 Review email from property manager and update closing documents and electronic files for property (7255-57 S Euclid Avenue) (.7); review property reports for tenants and exchange correspondence with property management (2800-06 E 81st Street) (.3); review reports on file and further request general ledgers from property management related to properties (1422-24 East 68th Street; 2800-06 E 81st Street; 4611-17 S Drexel Boulevard; 4750-52 S Indiana Avenue; 6217-27 S Dorchester Avenue; 7024-32 S Paxton Avenue; 7840-42 S Yates Avenue) (2.1); further communication with property manager related to review of requested property and tenant reports and request additional information (4750-52 S Indiana Avenue; 6217-27 S Dorchester Avenue) (1.2).

**Asset Disposition** 

2/25/2021 JR

4.50 Review email from property management regarding previously requested property information related to updated rent roll, subsidy agreements, leases, and update electronic files regarding same (4611-17 S Drexel Boulevard) (1.2); exchange correspondence with property management regarding same (4611-17 S Drexel Boulevard) (.1); review email from property management regarding previously requested property information related to updated rent roll, subsidy agreements, leases, and update electronic files regarding same (7024-32 S Paxton Avenue) (.8); review email from property management regarding previously requested property information related to updated rent roll, subsidy agreements, leases, and update electronic files regarding same (6217-27 S Dorchester Avenue) (.6); exchange correspondence with property management regarding same (6217-27 S Dorchester Avenue) (.2); review single family home purchase and sale contract and update closing documents with buyer information (single family) (1.6).

**Asset Disposition** 

2/26/2021 AEP

0.50 Prepare e-mail to title insurer regarding discovery of federal order expunging liens filed against remaining unsold EquityBuild properties (7024-32 S Paxton Avenue; 7255-57 S Euclid Avenue; 1422-24 East 68th Street; 2800-06 E 81st Street; 4750-52 S Indiana Avenue; 7840-42 S Yates Avenue; 7109-19 S Calumet Avenue) and requesting deletion of corresponding special exceptions from all applicable title commitments (.3); teleconference with prospective purchaser of receivership property (1102 Bingham (Houston, TX)) regarding review, approval, and certification of final draft of application for vacation of city street (.2).

**Asset Disposition** 

SUBTOTAL: [89.70 15683.00]

**Business Operations** 

2/3/2021 KMP

0.20 Communicate with property manager regarding utility refunds for sold properties (2736-44 W 64th Street; 6356 S California Avenue; 7201-07 S Dorchester Avenue).

**Business Operations** 

JRW 0.40 Communicate with property manager and A. Porter regarding payment of administrative judgment (7024-32 S Paxton Avenue) (.2); correspondence to K. Duff and A. Porter regarding default judgment entered against property (6250 S Mozart Street) (.1); email to corporation counsel regarding housing court orders (6217-27 S Dorchester Avenue; 638-40N Avers Avenue; 7237-43 S Bennett Avenue; 7600-10 S Kingston Avenue) (.1).

**Business Operations** 

Date	Indiv H	<u>ours</u>	Description
2/3/2021	JR	0.30	Update property tax balance for unpaid taxes.
			Business Operations
2/4/2021	JRW	0.90	Review housing court orders (7600-10 S Kingston Avenue; 7237-43 S Bennett Avenue; 638-40 N Avers Avenue; 6217-27 S Dorchester Avenue) and confer with A. Watychowicz regarding docketing of same (.3); correspondence with A. Porter regarding housing court matters (7600-10 S Kingston Avenue; 7237-43 S Bennett Avenue; 638-40 N Avers Avenue; 6217-27 S Dorchester Avenue) (.2); correspondence with claimant's counsel regarding administrative proceedings (638-40 N Avers Avenue; 6217-27 S Dorchester Avenue; 4611-17 S Drexel Boulevard; 6250 S Mozart Street) (.3); email to property manager regarding housing court order (6217-27 S Dorchester Avenue) (.1).
			Business Operations
2/5/2021	AW	0.30	Finalize motion for extension and communicate with counsel regarding same (.2); file approved motion and schedule presentment of same (.1).
			Business Operations
	ED	1.10	Prepare analysis of sold properties with respect to which accounting reports are final (.7); email correspondence with accountants and J. Rak regarding same and providing additional dataand information necessary for preparation of reports for the three month period ended December 31, 2020 (.4).
			Business Operations
2/8/2021	JRW	0.50	Exchange correspondence with A. Porter regarding payment of water bill (5618-20 S Martin Luther King Drive) (.1); exchange correspondence with A. Porter and property manager regarding notice of building code violation (2129 W 71st Street) (.3); review notice of violation (1449 N Talman Avenue) and related exchange with A. Watychowicz and A. Porter (.1).
			Business Operations
	MR	0.30	Attention to upcoming hearing and emails and order regarding same.
			Business Operations
2/9/2021	KMP	0.40	Prepare forms for funds transfer to property manager to renew security installation at property (7237-43 S Bennett Avenue) and to financing company for premium financing installment on property policy, and communicate with K. Duff and bank representatives regarding same.
			Business Operations
	KMP	0.30	Review history of payments to property manager for property (1401 W109th Place) and communicate with K. Duff regarding same.

Date	<u>Indiv</u> H	lours	Description
			Business Operations
2/9/2021	JR	0.40	Review outstanding property taxes and exchange correspondence with property management requesting availability of same for payments of outstanding property taxes.
			Business Operations
2/10/2021	KMP	2.40	Work on updating list of EB entities with tax identification numbers.
			Business Operations
	ED	0.20 requi	Email correspondence with accountant regarding financial records for preparation of October 2020 accounting reports.
		requi	Business Operations
	AEP	0.30	Research property tax delinquencies associated with properties and prepare e-mail to K. Duff regarding status.
			Business Operations
2/11/2021	JRW	0.20	Review January results summary from vendor and related email regarding payment requested (1414-18 East 62nd Place).
			Business Operations
	JR	3.20	Review emails from accounting firm and E. Duff related to property reports for October, November and December and produce same in preparation for review.
			Business Operations
2/12/2021	AW	0.50	Attention to email from Texas counsel forwarding outstanding invoices, review invoices and motions regarding same, and respond to counsel.
			Business Operations
2/16/2021	KMP	1.40	Review communications with property managers regarding requests for funds for management expenses and utilities (638-40 N Avers Avenue; 7237-43 S Bennett Avenue; 1401 W 109th Place; 1414-18 East 62nd Place) (.3); prepare request forms for funds transfers, and communications with K. Duff and bank representatives regarding same (638-40 N Avers Avenue; 7237-43 S Bennett Avenue; 1401 W 109th Place; 1414-18 East 62nd Place) (.5); communicate with K. Duff regarding property management transfer (7109-19 S Calumet Avenue) and research property manager's portal to review and identify documentation relating to management of property (7109-19 S Calumet Avenue) (.4); communicate with S. Zjalic regarding project relating to same (7109-19 S Calumet Avenue) (.2).

#### **Business Operations**

2/16/2021 ED 0.30 Email correspondence with accountant regarding identification of sold properties for which preparation of monthly reporting is no longer required.

**Business Operations** 

SZ 0.40 Phone and email communication with K. Pritchard regarding review of property manager's portal to recover and preserve records related (7109-19 S Calumet Avenue).

**Business Operations** 

AW 0.90 Communicate with counsel regarding second confidentiality order and serve via email on claimants (.6); communicate with J. Rak and K. Duff regarding status of motions and related orders (.3).

**Business Operations** 

JRW 0.80 Correspond with property manager regarding pending motion and related email to court's clerk (.2); prepare for administrative hearing (4611-17 S Drexel Boulevard) and related correspondence with property manager (.5); confer with property manager regarding repair estimate (6217-27 S Dorchester Avenue) (.1).

**Business Operations** 

2/17/2021 KMP

1.70 Communicate with property managers regarding funds transfers for management expenses and utilities (638-40 N Avers Avenue; 7237-43 S Bennett Avenue; 1401 W 109th Place; 1414-18 East 62nd Place) (.2); review bank records and annotate property account balance schedule to reflect source of funds (.9); attention to receipt of property manager's year-end annual reports for EB entities (EB South Chicago 3 LLC,1700 W Juneway LLC, EB South Chicago 4 LLC, EquityBuild LLC, SSDF4 7255 S. Euclid LLC, SSDF7 Portfolio 1 LLC, SSPH Portfolio 1 LLC) (.3); conference with S. Zjalic regarding property management transfer (7109-19 S Calumet Avenue) and research relating to property management of property (7109-19 S Calumet Avenue) (.3).

**Business Operations** 

JRW 1.10 Exchange correspondence with property manager regarding resolution of administrative matters (4611-17 S Drexel Boulevard) (.1); exchange correspondence with corporation counsel regarding administrative matter (4611-17 S Drexel Boulevard) (.1); correspondence to City of Chicago ownership dispute division regarding new administrative matter (1449 N Talman Avenue) (.3); exchange correspondence with K. Duffregarding estimate to repair violations included in housing court order (6217-27 S Dorchester Avenue) (.2); update records regarding pending administrative proceedings (4611-17 S Drexel Boulevard; 2129 W 71st Street; 7024-32 S Paxton Avenue; 6250 S Mozart Street; 8209 S Ellis

Date	<u>Indiv</u>	Hours	Description
			Avenue) (.4).
			Business Operations
2/19/2021	SZ	1.50	Review of records related to property (7109-19 S Calumet Avenue).
			Business Operations
2/22/2021	KMP	0.60	Review documentation collected by S. Zjalic from property manager's portal relating to specific property (7109-19 S Calumet Avenue) and participate in telephone conference regarding same.
			Business Operations
	ED	1.10	Begin review of drafts of October accounting reports.
			Business Operations
	JRW	1.00	Correspondence with corporation counsel and claimants' counsel regarding order entered in administrative proceeding (4611-17 S Drexel Boulevard) (.2); review administrative orders (6250 S Mozart Street; 4520-26 S Drexel Boulevard) and related communication with K. Pritchard regarding docketing hearings (.3); attention to collection noticefrom city (6250 S Mozart Street), confer with K. Duff and draft correspondence to corporation counsel regarding same (.5).
			Business Operations
	JR	3.80	Review October reports and identify any and all discrepancies (3.6); exchange correspondence with E. Duff regarding same (.2).
			Business Operations
2/23/2021	KMP	0.20	Review notice of property tax lien and communicate with EB team regarding same (1102Bingham (Houston, TX)).
			Business Operations
	JRW	0.30	Exchange correspondence with K. Duff and J. Rak regarding notice of tax lien (638-40 N Avers Avenue) (.1); correspondence to corporation counsel regarding default order (6250 S Mozart Street) (.2).
			Business Operations
	JR	0.30	Exchange correspondence with E. Duff regarding final review of October property financial reporting.
			Business Operations
2/26/2021	KMP	0.30	Prepare form for funds transfer to finance company for property insurance installment payment, and communicate with K. Duff and bank representatives regarding same.

Date Indiv Hours Description **Business Operations** SUBTOTAL: [27.60 5256.001 Case Administration 2/3/2021 AW 0.40 Request update to Receivership page (.2); compile pleadings entered by federal court relating to dismissed appeals and email counsel regarding same (.2). Case Administration 2/11/2021 JR 2.60 Communicate with A. Watychowicz regarding transfer of data from hard drive for client and attempt download (.6); exchange communication with A. Watychowicz requesting access to EquityBuild records (1.5); exchange communication with IT regarding EquityBuild records (.5). Case Administration 2/26/2021 SZ 0.80 Attention to pleading updates for the Receivership's website and communication with IT vendor about the same. Case Administration SUBTOTAL: [ 3.80 508.00]

#### Claims Administration & Objections

2/1/2021 SZ 0.80 Review of claims related to property (7927-49 S Essex Avenue).

Claims Administration & Objections

AW 2.80 Respond by email to claimant's voice message and claimant's counsel (.2); follow up with K. Duff and J. Wine regarding standing of entities issues raised by claimants (.1); request update to claims database and communicate with J. Wine regarding corrected claims (.2); create update sheet for database vendor (.3); review email communication with claims vendor to establish requested revisions and updates in last quarter (.2); start work on group assignments, establish split per claims numbers, and email exchanges and calls with J. Wine regarding finalization of same (1.8).

Claims Administration & Objections

JR 1.20 Review proof of claims and update claims review chart regarding same (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue).

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

Claims Administration & Objections

2/1/2021 JRW

3.40 Revise draft proposed order in accordance with court's directive and forward same to courtroom deputy (.2); confer with A. Watychowicz regarding updating claims records with vendors (.3); telephone conference with claimant's counsel regarding EquityBuild documents (.2); attention to drafting revised case management orderincorporating court's rulings regarding claims process (1.8); work with A. Watychowicz on exhibit listing groupings of properties and related exchange with M. Rachlis (.9).

Claims Administration & Objections

0.60 Attention to proposed order on claims related issues and exchanges with J. Wine regarding order and property groupings.

Claims Administration & Objections

2/2/2021 AW

MR

3.50 Attention to emails and voice messages from claimants, review claims, and work with K. Duff and J. Wine on proposed responses to same (1.3); respond to claimants' voice messages, update requests, and other emails (.9); continue and complete work on properties group assignments and communicate with J. Wine regarding same (.9); update contact information per claimants request (.1); attention to entered order regarding grouping, lien issues, and claims process and update docket (.2); attention to mandate issuance from federal court and communicate with counsel regarding same (.1).

Claims Administration & Objections

JRW 1.70 Attention to responding to claimant inquiries (.8); review court order and related email exchange with counsel for claimants (.2); revise exhibit regarding proposed tranches for claims process (.7).

Claims Administration & Objections

2/3/2021 AW

1.10 Review claims and other data and respond to claimants' emails (.7); review of claim and correspond with J. Wine regarding same and proposed request to claimant (.3); communicate with K. Pritchard regarding master claims list and unique claimant list (.1).

Claims Administration & Objections

JRW 1.60 Attention to responding to claimant inquiries (.5); exchange correspondence with M. Rachlis regarding court's request for proposed order summarizing rulings on claims process (.2); review redline of claims process outline, further revise to incorporate comments, convert to proposed order, further revision to incorporate comments regarding same, and circulate

<u>Date</u>	Indiv	Hours	Description
			proposed order to claimants' counsel and SEC (.9).
			Claims Administration & Objections
2/3/2021	MR	1.10	Attention to claims related outline and follow up with K. Duff and J. Wine (1.0); follow up regarding issues regarding request for order (.1).
			Claims Administration & Objections
2/4/2021	AW	0.30	Attention to email from claimant requesting to update her contact information, process her request, and email confirmation (.2); communicate with J. Wine regarding submitted claim and proposed revisions (.1).
			Claims Administration & Objections
	JRW	4.50	Telephone conferences with SEC (.2); study claim forms and supporting documents and related email exchange with A. Watychowicz and K. Duff (.6); correspondence with M. Rachlis regarding exhibit of proposed tranches (.2); multiple rounds of comments from claimant's counsel, K. Duff, M. Rachlis and SEC on proposed order regarding claims process, and further revision of same (3.4); email to courtroom deputy regarding entry of proposed order (.1).
			Claims Administration & Objections
	MR	1.20	Attention to various issues on tranches and claims related issues.
			Claims Administration & Objections
2/5/2021	AW	0.30	Attention to email communication regarding grouping of properties (.1); email suggested revisions to filing notice (.1); file approved notice and grouping (.1).
			Claims Administration & Objections
	JRW	0.60	Correspond with claimants' counsel regarding final revisions to proposed order and related communications with K. Duff and M. Rachlis and revision of document.
			Claims Administration & Objections
	MR	1.00	Attention to revisions regarding draft order on claims process and follow up emails regarding same (.6); communications regarding same with Court (.1); review chart on claims process issues (.3).
			Claims Administration & Objections
2/8/2021	AW	0.30	Respond to claimant's update request (.1); email exchanges with J.Wine regarding revisions to claims database process for updating of same (.2).

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

Claims Administration & Objections

2/8/2021 JRW 0.40 Confer with A. Watychowicz regarding response to claimant inquiry (.1); updates to vendor database (.1); review claims review analysis (.2).

Claims Administration & Objections

2/9/2021 KMP 0.20 Review and revise draft email to claimants regarding court orders relating to claims process and communicate with A. Watychowicz regarding same.

Claims Administration & Objections

JR 1.10 Call with J. Wine and S. Zjalic related to claims process.

Claims Administration & Objections

AW 3.10 Attention to email from claimant requesting to update her contact information, process her request, and email confirmation (.2); attention to and revise proposed email to claimants regarding entered orders (.2); work with J. Wine and K. Pritchard on finalization of email (.2); serve entered order via email (.7); attention to email from claimant regarding grouping of properties and work with J. Wine and K. Duff on response (.2); attention to numerous emails responding to claims process order and work on standard responses to same (.7); respond to claimants emails (.3); attention to entered orders relating to claims process, review, and discuss changes applied to proposed drafts by the Judge (.4); communicate with IT consultant regarding email project and how to obtain access to extracted emails (.2).

Claims Administration & Objections

SZ 1.10 Meeting with J. Wine and J. Rak regarding review of the loans held against EBF properties.

Claims Administration & Objections

JRW 4.20 Review Judge Lee orders implementing claims process, related communications with A. Watychowicz and K. Duff regarding notice to claimants, and several revisions to draft of same (.9); confer with A. Watychowicz regarding service list (.2); review claims against property (1700-08 W Juneway Terrace) (.5); confer with K. Duff regarding vendor statement of work (.1); exchange correspondence with vendor regarding claims distribution project (.4); work with S. Zjalic and J. Rak on next stage of claims review process (1.1); related follow-up regarding property numbers (.1); communicate with K. Duff regarding response to claimant inquiry (.3); work with A. Watychowicz and K. Duff to draft standard responses to claimant inquiries regarding claims process (.6).

Claims Administration & Objections

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Claims Administration & Objections

2/11/2021 AW

1.90 Video call with database vendor, J. Wine and K. Pritchard regardingclaims process (.6); continue work on drafts and responses to numerous from claimants in response to order regarding claims process (1.2); communicate with database vendor regarding tracking number and update to claims files (.1).

Claims Administration & Objections

SZ 3.10 Review of claims (7927-29 S Essex Avenue; 6160-6212 S Martin Luther King Drive).

Claims Administration & Objections

JRW 1.50 Attention to claimant inquiries regarding confidentiality order (.4); conference call with document vendor regarding process for distribution of claim forms (.6) and related follow-up email (.3); confer with claimants' counsel regarding vendor agreement and cursory review of quote and license agreement (.2).

Claims Administration & Objections

2/12/2021 SZ

5.00 Continued to review claims (1700-08 W Juneway Terrace; 7749-59 S Yates Boulevard; 6160-6212 S Martin Luther King Drive; 6437-41 S Kenwood Avenue; 8100 S Essex Avenue; 5955 S Sacramento Avenue; 6001-05 S Sacramento Avenue; 7237-43 S Bennett Avenue) and update with information about independent contractors and trade consultants.

Claims Administration & Objections

AW 1.00 Continue work on drafts and responses to emails and voice messages from claimants in response to order regarding claims process (.8); communicate with K. Duff and M. Rachlis regarding emailing claimants second order relating to claims process (.1); communicate with J. Wine regarding comments on master claims list (.1).

Claims Administration & Objections

JRW 5.50 Exchange correspondence with vendor regarding claims distributionproject (.3); conference with K. Duff and M. Rachlis regarding claims review project, claims distribution project, and process for single-claim properties (1.5); continue working on claims review and related communications with S.Zjalic and J. Rak (2.6); attention to responding to claimant inquiries (.7); confer with A. Porter regarding institutional lender claims and provide files in response (.3); confer with A. Watychowicz regarding service of order (.1).

Claims Administration & Objections

Date Indiv Hours Description 2/12/2021 MR 1.80 Participate in meeting regarding various issues on claims with K. Duff and J. Wine. (1.5): attention to emails regarding claims process (.3). Claims Administration & Objections 2/14/2021 JRW 0.30 Confer with A. Porter regarding claims submitted by institutional lender and review related document. Claims Administration & Objections 2/15/2021 SZ 7.50 Review of loan claims (11117-11119 S Longwood Drive: 701-13 S 5th Avenue; 7237-43 S Bennett Avenue; 7026-42 S Cornell Avenue; 6001-05 S Sacramento Avenue). Claims Administration & Objections AW 2.20 Communicate with K. Duff and J. Wine regarding question from claimant (.1); respond to claimant requesting contact info update, update files, and

(.1); respond to claimant requesting contact info update, update files, and request update with claims vendor (.1); attention to emails from claimants regarding acknowledgement forms and update requests and respond to same (.9); email exchange with counsel regarding notification email to claimants about second order relating to claims process (.1); supplement claimant emailing list (.1); review emails relating to claim issue and correspond with K. Duff and J. Wine regarding same (.4); review file folders shared by databasevendor and follow up email regarding same (.2); attention to voice message from claimant's assistant and communicate with K. Pritchard regarding same (.1); communicate with IT consultant regarding email project (.1); attention to packet mailed in relation to promissory note assignment and email counsel regarding same (.1).

Claims Administration & Objections

JRW 4.10 Exchange correspondence with A. Porter regarding claims submitted by institutional lender (.3); confer with A. Watychowicz regarding service of second order regarding claims process (.1); work with A.Watychowicz and K. Duff regarding claimant inquiries (1.0); confer with J. Rak and S. Zjalic regarding claims review and related review of claims (8100 S Essex Avenue) (.6); preparation of property list for vendor and related review claims against funds to add to property list (1.7); review file listing from vendor and related correspondence regarding unmatched claims (.4).

Claims Administration & Objections

JR 2.60 Review EBF mortgagee list and update with claim amounts from proof of claims applications (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue) (2.4); review emails from S. Zjalic regarding EBF mortgagee claim amounts (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart

Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue) (.2).

Claims Administration & Objections

2/16/2021 KMP

0.30 Review various pleadings relating to motion practice on claims process and communicate with K. Duff regarding same.

Claims Administration & Objections

SZ 1.60 Attention to loan claims (1102 Bingham (Houston, TX); 1050 8th Ave N; 1131-41 E 7th Place; 5001 S Drexel Boulevard; 4520-26 S Drexel Boulevard; 7110 S Cornell Avenue; 6749-59 S Merrill Avenue) (.8); communication with J. Wine and J. Rak about the same (.7); review of claims (7834-44 S Ellis Avenue) (1).

Claims Administration & Objections

AW 1.40 Respond to emails from claimants regarding confidentiality order (.6); communicate with A. Porter regarding institutional lender claim (.1); call with database vendor regarding updates to database (.6); communicate with J. Wine regarding claim issue (7109-19 S Calumet Avenue) (.1).

Claims Administration & Objections

4.10 Review spreadsheets and related exchange correspondence with A. Porter and J. Porter regarding claims analysis (.6); correspond with document vendor regarding files transferred and related review of file listing (.5); confer with J. Rak regarding claims against property (6217-27 S Dorchester Avenue) (.1); conference call with document vendor and A. Watychowicz regarding claims distribution project (.5); revise property number list for vendor and related telephone conference with A. Watychowicz (.5); perform analysis of properties with single claim and related correspondence to team (1.9).

Claims Administration & Objections

JR
2.00 Review EB Mortgagee lists and update proof of claims loan amounts
(7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart
Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S
Manistee Avenue; 7947-49 S Essex Avenue) (1.6); exchange
correspondence with S. Zjalic, A. Porter and J. Wine regarding same (.4).

Claims Administration & Objections

2/17/2021 AW

1.30 Respond to emails from claimants regarding confidentiality order, general update, and contact information updates (.9); request update to claimants contact information (.1); review email files and communicate with IT consultant regarding additional folders needed to complete email project (.3).

Date	Indiv	Hours	Description
2/17/2021	JRW	1.30	Claims Administration & Objections  Study vendor agreements and send analysis regarding same to M. Rachlis and K. Duff (.8); exchange correspondence with A. Watychowicz and K. Duff regarding claimant inquiries (.2); correspondence to claimants' counsel regarding comments on proposed vendor contracts (.3).  Claims Administration & Objections
			Claims Administration & Objections
	MR	0.20	Attention to issues regarding vendor agreements regarding document library.
			Claims Administration & Objections
2/18/2021	AW	0.70	Respond to email from claimant regarding property questions (7237-43 S Bennett) (.1); respond to emails from claimants regarding confidentiality order (.6).
			Claims Administration & Objections
	JRW	1.20	Review transcript of hearing on claims process and related analysis (.3); drafting of correspondence to claimants regarding process and links to download claims documentation (.7); correspondence with document vendor regarding test emails to claimants (.2).
			Claims Administration & Objections
2/19/2021	SZ	1.30	Review of claims (7834-44 S Ellis Avenue; 4611-17 S Drexel Boulevard).
			Claims Administration & Objections
	JRW	0.20	Email exchange with vendor regarding encryption of claimant emails (.1); confer with K. Duff regarding claimant inquiry (.1).
			Claims Administration & Objections
2/20/2021	JRW	0.40	Correspond with K. Duff regarding claimant's claim (.1); review agreement with document vendor (.3).
			Claims Administration & Objections
2/22/2021	KMP	0.20	Attention to correspondence from claimant regarding executed acknowledgment and confer with J. Wine regarding same.
			Claims Administration & Objections
	SZ	2.80	Attention to emails related to claims (7834-44 S Ellis Avenue; 4611-17 S Drexel Boulevard) (.1); attention to analysis of claims (4611-17 S Drexel Boulevard) (2.7).

Claims Administration & Objections

2/22/2021 JRW

0.60 Review vendor license agreement and software quote and related correspondence with claimant's counsel (.4); confer with K. Pritchard regarding responding to claimant inquiries and administration of acknowledgements (.2).

Claims Administration & Objections

2/23/2021 AEP

1.00 Read through EquityBuild e-mails for information pertaining to title history on receivership property (1102 Bingham (Houston, TX)), including transactions with investors and issues decided in litigation.

Claims Administration & Objections

2/24/2021 KMP

0.20 Communicate with J. Wine regarding draft notice of opt-out claimants.

Claims Administration & Objections

JRW 4.70 Telephone conference with K. Duff regarding process for single claim properties, unrecorded secured interests, and distribution of claims documentation (.5); correspond with vendor regarding encryption of emails and draft message for email sending passwords to claimants (.7); attention to responding to claimant inquiries (3.2); prepare notice of optouts for filing (.3).

Claims Administration & Objections

2/25/2021 KMP

0.80 Revise, finalize, and file notice of opt-out claimants, and confer with J. Wine regarding same (.5); prepare draft notice to claimants of filing of opt-out notice and communicate with J. Wine regarding same (.3).

Claims Administration & Objections

SZ 0.20 Attention to a claimant's voice message and email communication with J. Wine about the same (.2).

Claims Administration & Objections

JRW 2.40 Draft email to claimants regarding distribution of claims documentation (.4); finalize opt-out notice for filing (.2); confer with K. Pritchard regarding service of motions and notice (.2); conference with K. Duff and M. Rachlis regarding procedures for distribution of claim forms and EquityBuild documents (.7); exchange correspondence with documents vendor regarding customization of emails, cover email to claimants, and procedures regardingsame (.3); confer with J. Rak regarding EquityBuild documents and related email exchanges with J. Rak and K. Duff (.3); respond to voice message from claimant (.3).

Claims Administration & Objections

<u>Date I</u>	ndiv Ho	urs D	escription
2/25/2021	MR	1.10	Participate in meeting with K. Duff and J. Wine regarding claim form distribution (.7); furrier review of communications to claimants regarding claims form distribution and filing of notice (.4).
			Claims Administration & Objections
2/26/2021	KMP	0.70	Revise, finalize, and prepare transmittal emails for notice to claimants of filing of opt-out notice.
			Claims Administration & Objections
	JRW	0.20	Confer with document vendor regarding claimant inquiries.
			Claims Administration & Objections
SUBTOTAL:			[21.40 24410.00]
Status Reports		-	
2/1/2021	AW	1.60	Communicate with J. Wine regarding status report, revisions, and exhibits (.1); study status report and email exchanges with J. Wine regarding proposed revisions (.8); attention to multiple email exchanges regarding proposed revisions to status report and work with J. Wine to incorporate same (.3); finalize status report, and serve as per certificate of service (.4).
			Status Reports
	JR 0.40	0 Rev	view email from A. Watychowicz regarding filing of 4th quarter 2020 status report and respond accordingly (.1); complete electronic filing of status report (.3).
			Status Reports
	JRW	0.70	Work with A. Watychowicz to finalize fourth quarter status report for filing.
			Status Reports
	MR	0.40	Review draft report and follow up with J. Wine and K. Duff regarding same.
			Status Reports
SUBTOTAL:			[ 3.10 618.00]
Tax Issues			
2/8/2021	KMP	0.20	Exchange correspondence with tax administrator regardinginformation for 2020 QSF tax returns.
			Tax Issues

<u>Date Indiv H</u> 2/11/2021 KMP	Ours Description  0.20 Forward tax form (4315-19 S Michigan Avenue) to tax administrator and accountant.	
	Tax Issues	
2/18/2021 KMP	1.40 Communicate with tax administrator regarding information required for preparation of QSF 2020 tax returns (.2); continue toreview various files documents to locate tax identification numbers for EB entities (1.2).	and
	Tax Issues	
OTAL:	[ 1.80	252.00]

\$48,269.00

255.30

Other Charges			
	Description		
Business Operations			
	Photocopies for February 2020		185.00
	Software license fees for February 2021 (Summit Hosting, \$266.50; Google Suite, \$96.37)		362.87
	Online research for February 2021		1,431.87
SUBTOTAL:		[	1,979.74]
Total Other Charges			\$1,979.74

Summary of Activity

Summary of real	vity
	Hours Rate
Jodi Wine	53.20 260.00 \$13,832.0
Ania Watychowicz	30.20 140.00 \$4,228.0
Justyna Rak	94.80 140.00 \$13,272.0
Kathleen M. Pritchard	16.80 140.00 \$2,352.0
Stoja Zjalic	31.90 110.00 \$3,509.0
Andrew E. Porter	15.00 390.00 \$5,850.0
Ellen Duff	2.70 390.00 \$1,053.0
Michael Rachlis	10.70 390.00 \$4,173.0

# **SUMMARY**

Legal Services	\$48,269.00
Other Charges	\$1,979.74
TOTAL DUE	\$50,248.74

# Case: 1:18-cv-05587 Document #: 993-1 Filed: 05/17/21 Page 121 of 162 PageID #:32409 **Rachlis Duff & Peel, LLC**

542 SOUTH DEARBORN STREET SUITE 900 CHICAGO, ILLINOIS 60605

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

May 17, 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.6622132

Legal Fees for the period March 1-31, 2021 \$48,200.00

Expenses Disbursed \$862.97

Due this Invoice \$49,062.97

<u>D</u>	ate	Indiv Hours Description				
Accounting	g/Auditing					
3,	/5/2021	KMP	0.30	Update account ledgers for Receiver's accounts.		
				Accounting/Auditing		
3,	/22/2021	KMP	1.60	Update account ledgers with recent transactions and confirm balances against online banking platform (.3); begin preparation of schedules of receipts and disbursements for receivership accounts for February and March 2021 (1.3).		
				Accounting/Auditing		
SUBTOTA	L:				[ 1.90	266.00]
Asset Anal	ysis & Re	covery				
3/	/1/2021	JRW	0.30	Review draft notice letter and redline and related teleph conference with K. Duff.	none	
				Asset Analysis & Recovery		
		KMP	0.90	Further work with K Duff to compile materials relating to asset holder.	o response to p	ootential
				Asset Analysis & Recovery		
		MR	1.00	Attention to potential asset holder letter and review and edit letter.		
				Asset Analysis & Recovery		
3/	/2/2021	KMP	0.90	Revise and finalize response letter, exhibits, and subpoena to potential asset holder and confer with K. Duff regarding same.		
				Asset Analysis & Recovery		
		MR	0.30	Further review letter regarding potential asset holder and follow up with K. Duff.		h K.
				Asset Analysis & Recovery		
3,	/4/2021	KMP	1.30	Study response to subpoena to potential asset holder and confer with K. Duff regarding same (.2); revise subpoena and prepare correspondence to potential asset holder regarding same (.8); communicate with accountant and EB team regarding TINs for EB entities (.3).		nce to
				Asset Analysis & Recovery		

Date	Indiv	<u>Hours</u>	Description
3/8/2021	KMP	0.30	Prepare notice of subpoena potential asset holder and communicate with K. Duff and J. Wine regarding same.
			Asset Analysis & Recovery
3/9/2021	KMP	1.00	Communications with K. Duff and A. Porter regarding statements and other materials received from asset holder and potential need to issue subpoena for same (.6); revise notice of third-party subpoena and serve on SEC and defendants (.3); communicate with K. Duffand J. Wine regarding same (.1).
			Asset Analysis & Recovery
3/10/2021	KMP	0.70	Prepare subpoena to asset holder and communicate with K.Duff and A. Porter regarding same.
			Asset Analysis & Recovery
3/15/2021	KMP	0.30	Communications with K. Duff, J. Wine and A. Porter regarding issues relating to subpoena to asset holder.
			Asset Analysis & Recovery
3/16/2021	KMP	1.10	Finalize subpoena to asset holder and serve upon asset holder's representative (.4); communications with K. Duff, M. Rachlis, J. Wine and A. Porter regarding issues relating to asset holder subpoena including efforts to formally serve same, and research relating to same (.7).
			Asset Analysis & Recovery
	MR	0.20	Further attention to bank subpoena.
			Asset Analysis & Recovery
3/17/2021	KMP	0.20	Further communications with K. Duff regarding issues relating to service of subpoena on asset holder.
			Asset Analysis & Recovery
3/18/2021	JRW	0.80	Telephone conference with K. Duff and third-party regarding response to records subpoena (.6); related telephone conference with K. Duff (.2).
			Asset Analysis & Recovery
3/19/2021	KMP	3.40	Review numerous account statements and documents to locate source of wire transfer relating to EB June 2018 property sale (1414-18 East 62nd Place) (2.4); communications with K. Duff, A. Porter, and E. Duff regarding source of funds and disposition of refund check (1414-18 East 62nd Place) (.2); further research regarding service of subpoena to asset holder and confer with K. Duff regarding same (.3); further revise subpoena to asset holder and prepare service by fax and email (.3); revise and serve notice of subpoena to defendants (.2).

Date	Indiv Ho	rs Description		
		Asset Analysis & Recovery		
3/24/202	1 KMP	Communications with K. Duff and A. Porter regarding service of subpoena to asset holder.		
		Asset Analysis & Recovery	Asset Analysis & Recovery	
3/25/202	1 JRW	Exchange correspondence regarding response to subpoena and confer with K. Duff regarding same.		
		Asset Analysis & Recovery		
	KMP	0.20 Attention to communications with potential asset holder regarding response to subpoena.		
		Asset Analysis & Recovery		
3/26/202	1 KMP	Prepare check and transmittal letter to potential asset holder regarding payment of fees for production of documents responsive to subpoena, and confer with K. Duff regarding same.		
		Asset Analysis & Recovery		
3/30/202	1 AEP	0.20 Teleconference with K. Duff regarding potential claims.		
		Asset Analysis & Recovery		
SUBTOTAL:		[13.90 2527	 .00]	
Asset Disposition				
3/1/2021	AEP	0.70 Communications with buyer's counsel, lender's counsel, management companies, and brokers regarding prospective purchase and sale of single-family home portfolio regarding property inspection process (single family) (.4); teleconference with title company underwriters regarding status of transaction, status of review of remaining exceptions to title, and potential closing date (single family) (.3).	of	
		Asset Disposition		
3/2/2021	JR	Review email from K. Pritchard regarding notices relating to various properties, review, save in electronic property files and forward to K. Duff, J. Wine and A. Porter (4533-47 S Calumet Avenue; SSDF5 Portfolio 1 LLC; 7110 S Cornell Avenue; 4520-26 S Drexel Boulevard; 7109-19 S Calumet Avenue; 7600-10 S Kingston Avenue; 6554-58 S Vernon Avenue; 4611-17 S Drexel Boulevard; 7656-58 S Kingston Avenue; 4533-47 S Calumet Avenue).		
		Asset Disposition		
	KMP	0.20 Communication with J. Rak regarding confirmation of payment to title company for post-closing balance of utility bill (4533-47 S Calumet Avenue).		

Date	Indiv	Hours	Description

**Asset Disposition** 

3/4/2021 AEP

0.20 Teleconference with receivership broker regarding status of ruling on tenth motion to confirm sales (.1); teleconference with receivership broker regarding acceptance of highest and best offer to purchase receivership property (638-40 N Avers Avenue) and potential timing of motion to confirm (.1).

**Asset Disposition** 

JR 4.90 Review emails and exchange correspondence with K. Pritchard and K. Duff regarding EIN numbers for EquityBuild entities (.1); review, locate and update EquityBuild EIN numbers (4.8).

**Asset Disposition** 

KMP 0.20 Exchange correspondence with property manager regarding post-sale reconciliations and anticipated deposits to property accounts (4533-47 Calumet Avenue; 6949-59 S Merrill Avenue) in connection with same.

Asset Disposition

3/5/2021 AEP

1.20 Teleconference with K. Duff and receivership broker regarding necessity for proposed offer to purchase receivership property (638-40 N Avers Avenue) (.7) and status of receivership property (7109-19 S Calumet Avenue) (.3); prepare incoming wire instructions for receivership property (638-40 N Avers Avenue) and transmit same to counsel for prospective purchaser along with fully-executed purchase and sale contract (.2).

**Asset Disposition** 

KMP 0.30 Attention to receipt of final post-sale reconciliation reports from property manager and check property accounts to confirm receipt of final distributions (4533-47 S Calumet Avenue; 6949-59 S Merrill Avenue).

**Asset Disposition** 

MR 0.50 Conference regarding property (638-40 N Avers Avenue) sales and issues regarding offers with K. Duff, J. Baasch and A. Porter.

**Asset Disposition** 

3/8/2021 AEP

1.00 Review title commitment for receivership property (638-40 N Avers Avenue), request update and deletion of special exceptions covered by hold harmless letter, and transmit existing version to purchaser's counsel (.2); begin preparation of twelfth motion to confirm in connection with prospective conveyance of receivership property (638-40 N Avers Avenue) (.8).

**Asset Disposition** 

Date Indiv Hours Descript	ription
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3/9/2021 KMP

0.40 Communications with K. Duff to provide account numbers for deposits to certain property accounts (2736-44 W 64th Street; 6356 S California Avenue; 7201-07 S Dorchester Avenue) (.2); review property account (6949-59 S Merrill Avenue) to confirm receipt of post-sale reconciliation funds and communicate with property manager regarding same (.2).

**Asset Disposition** 

3/10/2021 AEP

0.80 Teleconference with prospective purchaser of receivership property (1102 Bingham (Houston, TX)) regarding source of continuing permit processing delays and potential timeline for resolution (.2); respond to requests for information from counsel for prospective purchaser of receivership property (638-40 N Avers Avenue), contact title underwriter for copies of documents evidencing special exceptions, contact escrow officer regarding need for additional hold harmless protection over aged administrative proceeding, and update closing checklist (.6).

**Asset Disposition** 

3/11/2021 AEP

0.40 Review special exceptions to title commitment associated with receivership property (638-40 N Avers Avenue), deliver same to buyer's counsel, and request update to identity of proposed insured (.2); prepare hold harmless request to former EquityBuild title insurer seeking deletion of additional special exception on title commitment associated with receivership property (638-40 N Avers Avenue) (.2).

Asset Disposition

JR 0.40 Review City of Chicago notices regarding building violations, save in electronic files and exchange correspondence with J. Wine and A. Porter regarding same (6356 S California Avenue; 5618-20 S Martin Luther King Drive).

**Asset Disposition** 

3/16/2021 JR

0.90 Review email from K. Duff regarding property tax balances and status of payment (1102 Bingham (Houston, TX)) (.1); exchange communication with law firm and request payment informationoptions (1102 Bingham, (Houston, TX)) (.6); further exchange correspondence with K. Duff regarding property tax issues (1102 Bingham, (Houston, TX)) (.2).

**Asset Disposition** 

JR 0.20 Review email from K. Duff and provide requested property information and closing dates.

Asset Disposition

KMP 0.20 Communications with property manager regarding post-sale reconciliation for property (1131-41 E 79th Street).

**Asset Disposition** 

<u>Date</u>	Indiv	Hours	Description
3/17/2021	AEP	0.20	Review and revise proposed amendment to purchase and sale contract pertaining to single-family home portfolio and forward same to K. Duff for execution (single family).
			Asset Disposition
	JRW	0.30	Confer with K. Duff regarding sale of property (4611-17 S Drexel Boulevard) (.1); correspondence to courtroom deputy regarding pending motions (.2).
			Asset Disposition
3/23/2021	JR	2.00	Review title commitments and legal descriptions for various parcels and draft closing documents for single family homes related to EB South Chicago 1 LLC (1017 W 102nd Street; 1516 E 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) (1.8); exchange correspondence with A. Porter regarding discrepancies found on the title commitment and missing legal descriptions regarding same (1017 W 102nd Street; 1516 E 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) (.2).
			Asset Disposition
3/24/2021	AEP	0.20	Conference call with N. Gastevich and J. Rak regarding status of preparation of closing documents associated with properties in tenth and eleventh motions to confirm sales, as well as single-family home portfolio (single family).
			Asset Disposition
	JR	6.60	Draft closing documents for single family homes (single family).
			Asset Disposition
3/25/2021	JR	6.00	Review email from K. Pritchard related to wire instructions for unsold properties and update electronic files regarding same (7237-43 S Bennett Avenue; 638-40 N Avers Avenue; 7109-19 S Calumet Avenue; 1102 Bingham (Houston, TX)) (.6); review title commitment related to property and update closing documents for property in preparation for closing (638-40 N Avers Avenue) (4.7); exchange correspondence with buyer's counsel and request buyer information for same (638-40 N Avers Avenue) (.2); further correspondence with the real estate broker requesting commission statement for same (638-40 N Avers Avenue) (.1); review email from J. Wine and K. Duff and research documents of record regarding an alternate address for property (7051 S Bennett Avenue) regarding violations notice (.4).
0.100.1000	ı.e.	4.00	Asset Disposition
3/26/2021	JK	4.90	Review email from buyer's counsel and real estate broker related to requested buyer information and update closing documents regarding same (7840-42 S Yates Avenue) (.4); exchange correspondence with real estate

broker requesting additional missing information originally requested (7840-42 S Yates Avenue) (.1); review emails for buyer requested information for remainder of unsold properties and update closing checklists (7255-57 S Euclid Avenue; 7024-32 S Paxton Avenue; 6217-27 S Dorchester Avenue; 4750-52 S Indiana Avenue; 2800-06 E 81st Street) (.3); review email from J. Wine related to a request regarding violation notice and provide receiver's deed from sale of property, forward violation notice to buyer's counsel (7051 S Bennett Avenue) (.1); exchange correspondence with K. Duff regarding a request to forward a notice related to space leasing for previously sold property, forward same to buyer (6250 S Mozart Street) (.1); update closing documents for properties in anticipation of closing (1422-24 East 68th Street; 2800-06 E 81st Street) (3.9).

**Asset Disposition** 

3/26/2021 KMP

0.20 Communicate with property manager regarding post-sale reconciliation and confirm deposit to property account relating to same (1131-41 E 79th Place).

Asset Disposition

3/29/2021 AEP

6.00 Review letter from counsel for prospective purchaser of single-family home portfolio requesting credits for alleged undisclosed latent defects, review all inspection reports associated with corresponding alleged defects. teleconference with K. Duff regarding potential response to purchaser, and teleconference with counsel for prospective purchaser regarding timing of response, timing of response to title commitment exception letter, and timing of motion to confirm and potential scheduling of closing (single family) (1.8); teleconference with receivership brokers regarding strategy for responding to single-family home offer received from prospective purchaser (single family) (.5); teleconference with K. Duff regarding offer from prospective purchaser of single family homes (single family) (.2); finalize first draft of motion to confirm sale (638-40 N Avers Avenue), including revisions to proposed supporting declaration of receivership broker, and transmit same to K. Duff and J. Wine for comment (2.2); teleconference with receivership brokers to analyze credit requests and formulate strategy for responding to singlefamily home offer received (single family) (1.3).

Asset Disposition

JR 0.80 Review notic

0.80 Review notice to tenants and update same for property in anticipation for sale (4611-17 S Drexel Boulevard) (.6); review email from buyer's counsel related to property closing (638-40 N Avers Avenue) and respond accordingly (.2).

Asset Disposition

3/30/2021 AEP

4.10 Review proposed revisions to draft twelfth motion to confirm sales and draft of accompanying declaration and make appropriate changes (638-40 N Avers Avenue) (.3); revise proposed twelfth motion to confirm sale, revise proposed supporting declaration, assemble and number all exhibits, prepare proposed order, and transmit final proposed set of motion papers to M. Rachlis (638-40 N Avers Avenue) (1.4); teleconference with K. Duff and receivership brokers regarding strategy for negotiating with prospective purchaser of single-family homes (single family) (.3); teleconference with K. Duff and counsel for

secured lender regarding strategyfor negotiating resolution of impasse with prospective purchaser of single-family homes (single family) (.2); teleconference with K. Duff and receivership brokers regarding proposed offer of credit in connection with prospective sale of single-family homes (single family) (.2); teleconference with K. Duff regarding status of entitlement relief being pursued by prospective purchaser (1102 Bingham (Houston, TX)) (.2); continued series of conference calls with receivership brokers, counsel for secured lender, and K. Duff regarding negotiation of resolution to purchase price credit demanded by prospective purchaser of single-family homes (single family) (1.5).

#### **Asset Disposition**

3/30/2021 JR

0.20 Review amendments to purchase and sale contract related to properties (single family) (.1); exchange correspondence with A. Porter requesting update to single family home purchase and sale contract status relating to the inspection period (single family) (.1).

**Asset Disposition** 

JRW 0.60 Review and revise 12th motion to confirm sale and related exchanged regarding publication notice and insurance proceeds (638-40 N Avers Avenue).

Asset Disposition

**KMP** 

0.50 Revise correspondence relating to amendment of representation agreement for single family homes, and communicate with K. Duff and A. Porter regarding same (single family) (.3); communicate with K. Duff and E. Duff regarding post-sale reconciliation and deposit of funds (1131-41 E 79th Place) (.2).

**Asset Disposition** 

3/31/2021 AEP

5.00 Begin preparation of thirteenth motion to confirm sale of single-family home portfolio (single family) (.8); teleconference with J. Rak regarding imminent execution of single-family home portfolio purchase and sale agreement and preparation of closing documentation (single family) (.1); review proposed revisions to draft second amendment to purchase and sale agreement relating to single-family home portfolio, communicate with K. Duff regarding same, prepare second draft of second amendment, and transmit same to purchaser's counsel and receivership brokers (single family) (.5); continue preparation of thirteenth motion to confirm sale of single-family home portfolio (single family) (.7); finalize twelfth motion to confirm sale (638-40 N Avers Avenue) and transmit same to J.Rak with instructions for filing and service (.4); e-mail communications with K. Duff regarding negotiation of allocations of sales proceeds among single-family home properties (single family) (.1); prepare e-mail to receivership brokers regarding necessity of sworn declaration describing marketing process of single-family home portfolio, including specific facts needed to support motion to confirm sale (single family) (.2); prepare e-mail to counsel for secured lenders on single-family home portfolio regarding needfor allocation of sales proceeds among individual properties prior to filing motion to confirm (single family) (.2); read e-mails from title underwriter, research chain of title of property (1516 E 85th Place), and prepare scrivener's affidavit to correct discrepancies in grantorgrantee record (.8); research chains of title of properties (310 E 50th Street;

<u>Date</u> Indi	liv <u>Hours</u> D	escription
		1401 W 109th Place) and prepare scrivener's affidavits to correct discrepancies in previously recorded special warranty deeds (1.2); (continued)
		Asset Disposition
3/31/2021 A	AEP 0.10	(continued); teleconference with receivership broker regarding court approval of tenth motion to confirm and insistence of prospective purchaser (4611-17 S Drexel Boulevard) on closing credit associated with delay in issuance of ruling (.1).
		Asset Disposition
JI	IR 0.80	Exchange communication with A. Porter regarding property portfolio (single family) (.3); file motion (12th) to confirm sale (638-40 N Avers Avenue) (.5).
		Asset Disposition
Jl	IRW 0.80	Work with A. Porter and K. Duff on twelfth motion to confirm sales (638-40 N Avers Avenue) (.4); confer with J. Rak regarding service on claimants (638-40 N Avers Avenue) (.1); review court's decision granting remainder of tenth sales motion and related correspondence regarding order (.3).
		Asset Disposition
N	MR 0.50	Attention to 12th motion on sales and follow up regarding same (638-40 N Avers Avenue).
		Asset Disposition
SUBTOTAL:		[52.80 12821.00]
Business Operations		
3/2/2021 E	ED 2.60	Continue review and analysis of draft October 2020 accounting reports (2.2); email correspondence to accountant with comments and questions regarding same (.3); email correspondence with K.Duff regarding reporting treatment for insurance premium refund for one property (7749-59 S Yates Boulevard) (.1).
		Business Operations
3/3/2021 E	ED 0.70	Review revised October reports from accountant in response to comments and questions.
		Business Operations
JI	IRW 0.40	Exchange correspondence with City of Chicago's Ownership Dispute Division securing nonsuit of administrative action (8209 S Ellis Avenue).
		Business Operations

Date	Indiv	Hours	Description
3/4/2021	KMP	0.30	Review January reporting from property manager.
			Business Operations
3/9/2021	JRW	1.10	Review administrative orders (6250 S Mozart Street; 4520-26 S Drexel Boulevard; 1449 N Talman Avenue) (.1); review administrative order (8209 S Ellis Avenue) and related correspondence (.1); review new notice of building code violation (7109-19 S Calumet Avenue) and related correspondence with property managers and K. Duff (.4); review administrative order (6949-59 S Merrill Avenue) and update docket (.1); exchange correspondence with property manager regarding repair estimate (6217-27 S Dorchester Avenue) (.2); correspondence with K. Duff and A. Porter regarding repair estimate (2129 W 71st Street) (.2).
			Business Operations
3/10/2021	AEP	0.50	Assemble all corporate documentation pertaining to receivership entity (7109-19 S Calumet Avenue) in connection with request for approval of rent subsidy payments (.2); in response to property manager request search for, and ultimately locate, EIN for ownership entity associated with receivership property (7109-19 S Calumet Avenue) in connection with tenant subsidy request (.3).
			Business Operations
3/11/2021	KMP	0.20	Attention to communication with property manager regarding February 2021 financial reporting (.1); communication with K. Duff regarding insurance installment payment (.1).
			Business Operations
3/12/2021	JRW	0.80	Review administrative orders (6356 S California Avenue; 5618-20 S Martin Luther King Drive), correspond with A. Porter and J. Rak and update records regarding same (.2); correspondence to counsel regarding notice of tax lien (1102 Bingham (Houston, TX)) (.4); related correspondence to A. Porter and K. Duff and update files (1102 Bingham (Houston, TX)) (.2).
			Business Operations
	KMP	0.60	Prepare form for funds transfer to finance company for insurance premium installment and communications with K. Duff and bank representative regarding same (.3); review banking records to locate possible deposit from prior EB property manager and communicate with K. Duff regarding same (.3).
			Business Operations
3/14/2021	ED	0.10	Email correspondence to accountant to provide additional property manager financial report (1700 W Juneway Terrace) for November reporting.
			Business Operations

<u>Date</u>	Indiv	Hours	Description
3/15/2021	JRW	0.40	Review administrative orders (6356 S California Avenue; 6250 S Mozart Street) and notice of code violation (4750-52 S Indiana Avenue) and related correspondence with property manager and J. Rak.
			Business Operations
	KMP	0.20	Briefly review and forward administrative orders (2832-36 W 63rd Street; 6250 S Mozart Street; 2804 W 64th Street; 6356 S California Avenue) and notice of violation (4750-52 S Indiana Avenue) to EB team.
			Business Operations
3/16/2021	JRW	0.20	Correspond with K. Duff and J. Rak regarding tax lien and payment plan (1102 Bingham (Houston, TX)) and related correspondence to counsel.
			Business Operations
3/17/2021	JRW	0.60	Exchange emails with K. Duff, A. Porter and property manager regarding estimate for repairs (2129 W 71st Street) (.1); exchange emails with corporation counsel regarding default judgment (6250 S Mozart Street) (.1); review new administrative orders (6558-4-58 S Vernon Avenue; 7656-58 S Kingston Avenue; 7600-10 S Kingston Avenue; 7109-19 S Calumet Avenue; 4611-17 S Drexel Boulevard) and related email exchange with J. Rak (.3); correspondence from collections counsel regarding notice of title research (1102 Bingham (Houston, TX)) (.1).
			Business Operations
	KMP	0.70	Communications with K. Duff regarding utility bills forwarded by property manager for sold properties (2736-44 W 64th Street; 7201 S Constance Avenue) (.2); follow up communication with property manager regarding same for billing that post-dates property sale (2736-44 W64th Street) (.2); confer with K. Duff, J. Wine and A. Watychowicz regarding communication from vendor representative relating to request for payment for software hosting platform (.3).
			Business Operations
3/18/2021	JRW	0.20	Exchange correspondence with property manager regarding payment of fine in City of Chicago administrative matter (4750-52 S Indiana Avenue) and update records regarding same.
			Business Operations
3/19/2021	KMP	0.70	Annotate property manager's spreadsheet detailing expenses for properties (1401 W 109th Place; 638-40 N Avers Avenue) (.3); prepare forms for funds transfers to property manager regarding property management expenses and management fees and communicate with K. Duff, bank representative, and property manager regarding same (1401 W 109th Place; 638-40 N Avers Avenue) (.4).

**Business Operations** 

3/24/2021 AEP

1.70 Review all correspondence and all documentation received from counsel regarding tax liens and foreclosure litigation filed against receivership property and potential strategies for resolution and prepare e-mail to J. Wine regarding management of dispute (1102 Bingham (Houston, TX)) (.5); review judgment and continuance ordersentered against receivership entity (SSDF4 6250 S Mozart LLC) and prepare e-mail to J. Wine regarding recommendations for addressing same (6250 S Mozart Street) (.2); review continuance order entered in connection with notice of violation (6949-59 S Merrill Avenue), prepare e-mail to purchaser's counsel regarding status, and prepare response to J. Wine regarding potential resolution of litigation (.2); review notice of violation filed (7109-19 S Calumet Avenue) and transmit same to property manager with request to defend receivership interests (.1); read notice of violation pertaining to property (2129 W 71st Street), review repair estimate, and prepare e-mail to K. Duff and J. Wine regarding proposed disclosure of same to prospective purchaser (.2); review photographs from property management firm reflecting conditions forming basis of notice of violation on property (2129 W 71st Street) and forward same to counsel for prospective purchaser with explanation (2129 W 71st Street) (.2); review additional housing court orders associated with receivership property (5618-20 S Martin Luther King Drive) and update calendar (.1); read e-mail correspondence regarding status of compliance with housing court order on receivership property (6217-27 S Dorchester Avenue) and consult purchase and sale contract to ensure disclosure to prospective buyer (.2).

**Business Operations** 

**JRW** 

1.40 Exchange correspondence with A. Porter regarding administrative matters (1102 Bingham (Houston, TX); 6250 S Mozart Street; 7110 S Cornell Avenue; 7109-19 S Calumet Avenue; 6949-59 S Merrill Avenue; 2129 W 71st Street; 6217-27 S Dorchester Avenue; 6356 S California Avenue).

**Business Operations** 

3/25/2021 JRW

0.70 Correspondence to collections counsel regarding claimed amount (.2); review administrative order (7051 S Bennett Avenue) and related search of recorder of deeds site and correspondence with K. Duff and J. Rak (.5).

**Business Operations** 

**KMP** 

0.20 Briefly review and forward administrative court documents to EB team (5001 S Drexel Boulevard; 7051 S Bennett Avenue).

**Business Operations** 

3/26/2021 AEP

0.20 Review notice of violation filed against receivership property (7051 S Bennett Avenue), research details of sale, and respond to team regarding handling of same.

**Business Operations** 

<u>Date</u>	Indiv H	<u>Description</u>
3/26/202 <sup>-</sup>	I JRW	0.40 Correspondence with City of Chicago ownership dispute division regarding violation notice (7051 S Bennett Avenue) and related correspondence with J. Rak and purchaser of property (.3); exchange emails with K. Pritchard regarding docketing administrative matters (6250 S Mozart Street; 5618-20 S Martin Luther King Drive) (.1).
		Business Operations
3/29/202	I ED	0.20 Review of email correspondence from accountant regarding drafts of November reports.
		Business Operations
	JR	1.80 Review email from accounting supervisor related to accounting reports for receivership properties and produce same.
		Business Operations
3/30/202 <sup>.</sup>	I ED	1.20 Review of email correspondence from lender's counsel (1131-41 E 79th Place) regarding post-closing property expenditures (.1), review and analysis of property manager reporting (.2) and email to property manager requesting additional information (.1); review of email correspondence from lender's counsel (6250 S Mozart Street) regarding post-closing property expenditures (.1), review and analysis of property manager reporting (.4) and email correspondence with property manager requesting additional information and backup (.2); email correspondence to K. Pritchard regarding reconciliation of backup materials (.1).
		Business Operations
3/31/202	I KMP	0.70 Review 12th motion to confirm sale of property and conferences with J. Rak to assist with filing of same (638-40 N Avers Avenue).
		Business Operations
SUBTOTAL:		[18.80 5176.00]
Case Administration	n	
3/2/2021	JR	0.30 Exchange communication with A. Porter related to scheduling a call regarding document recovery (.1); review email and exchange correspondence with IT team regarding EquityBuild records (.2).
		Case Administration
3/17/202 <sup>-</sup>	l NG	0.50 Searched through relevant emails and sent findings to K. Duff.
		Case Administration

Date Indiv Hours Description SUBTOTAL: 0.80 89.501

#### Claims Administration & Objections

3/1/2021 JRW 2.90 Correspondence with vendor and claimants' counsel regarding vendor contracts (.1); review transcript of proceedings and correspondence with K. Duff and M. Rachlis regarding process for addressing single-claim properties (single family) (.5); related correspondence with claimants' counsel (.2); confer with A. Porter regarding potential single claim properties (.1); correspondence with counsel for intervenor regarding joint status report (.1); correspondence with K. Duff and M. Rachlis regarding claims process (.2); correspondence with M. Rachlis and K. Duff regarding updates to claimant information (.2): attention to responding to claimant inquiries and related email exchanges with M. Rachlis and K. Duff (1.5).

Claims Administration & Objections

MR 0.40 Attention to issues regarding claims process for handling single family claims, updates on claims information, and materials to claims vendor.

Claims Administration & Objections

3/2/2021 **JRW**  3.70 Telephone conference with J. Rak regarding EquityBuild documents (.2); exchange correspondence with claimant's counsel regarding single claim properties (.1); investigate and respond to claimant inquiry and related correspondence with K. Pritchard (.4); confer with K. Pritchard regarding updates to claimant contact information and email bounce-backs (.3); exchange correspondence with K. Duff and M. Rachlis regarding procedures for claim distribution (.2); draft email to claimants regarding passwords and links to claims documentation and related revisions from M. Rachlis (.5); telephone conference with e-discovery vendors and counsel for claimants (1.1); attention to claimant inquiries (.7); confer with J. Rak regarding EquityBuild document transfer (.1); exchange correspondence with claimant's counsel regarding document hosting (.1).

Claims Administration & Objections

**KMP** 0.20 Communications with J. Wine regarding issues relating to recent correspondence to claimants.

Claims Administration & Objections

MR 0.30 Attention to communications from J. Wine regarding procedures for claim distribution and communication regarding claims documentation.

Claims Administration & Objections

3/3/2021 JR

0.70 Exchange communication with A. Porter regarding document recovery pertaining to documents of record for properties (7925 S Kingston Avenue; 7927-29 S Essex Avenue: 7760 S Coles Avenue: 7442-54 S Calumet

#### Date Indiv Hours Description

Avenue: 7300-04 S St Lawrence Avenue: 5001 S Drexel Boulevard: 1102 Bingham (Houston, TX); 7625-33 S East End Avenue; 8107-09 S Ellis Avenue; 8209 S Ellis Avenue; 8214-16 S Ingleside Avenue; 4533-47 S Calumet Avenue) (.3); review documents and save in electronic files pertaining to same (4533-47 S Calumet Avenue) (.4).

Claims Administration & Objections

3/3/2021 JR

2.80 Locate documents on the EquityBuild computer related to the inventory project (1.9); exchange correspondence with A. Watychowicz, J. Wine, S. Zjalic and IT consultant regarding same (.9).

Claims Administration & Objections

**JRW** 3.10 Study notes regarding claims against funds (CCF1 and CCF2) (.3); update spreadsheet and related email exchange with A. Porter regarding potential single claim properties (.6); conference call with claimants' counsel regarding process for single-claim properties (.5); confer with K. Duff and M. Rachlis regarding single claims process (.1); confer with J. Rak regarding EquityBuild documents (.1); cursory review of proposal for single claims process and related correspondence to K. Duff and M. Rachlis (.1); begin drafting joint claims status report (.4); communications with K. Duff and M. Rachlis regarding claims status report (.1); revise draft email to claimants from vendor and related exchange of correspondence with vendor (.5); review revised license agreement from vendor and related correspondence to claimants' counsel (.4).

Claims Administration & Objections

MR 1.00 Review and work on issues and email to claimants for joint claims status report.

Claims Administration & Objections

3/4/2021 JR 6.20 Call with vendor and J. Wine regarding claims distribution project (.4);

exchange correspondence with J. Wine regarding same (.8); review and update EquityBuild investor contact list related to the claims distribution

project (5.0).

Claims Administration & Objections

**JRW** 6.30 Confer with counsel for claimants regarding joint status report and requested extension (.1); prepare draft of status report and work with K. Duff and M. Rachlis on revisions to same (2.0); conference call with claims distribution vendor and J. Rak regarding email lists and procedures (.3); work with J. Rak on clean-up of email lists and opt-outs (.7); confer with J. Rak regarding EquityBuild documents (.1); attention to claimants' emails and related responses to claimant inquiries and communicate with K. Pritchard and claims vendor regarding updates to claimant information (1.8); update service emails for City of Chicago and related email exchange (.2); email exchange with SEC (.1); review and provide comments on database vendor

Date	Indiv	Hours	Description

license agreement (1.0).

Claims Administration & Objections

3/4/2021 KMP

0.30 Confer with J. Wine regarding claimants' responses to recent notices, review Receiver's email account regarding same, and forward responses to J. Wine.

Claims Administration & Objections

MR 1.00 Review and work on status report and communicate regarding report with J. Wine and K. Duff (.8); attention to vendor issues and comments on agreement (.2).

Claims Administration & Objections

3/5/2021 JR

1.70 Review email from J. Wine and further exchange correspondence with J. Wine related to the claims distribution project (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue) (.5); update and provide requested content related to the claims distribution project (7500-06 S Eggleston Avenue; 3030-32 E 79th Street; 7301-09 S Stewart Avenue; 2909-19 E 78th Street; 7549-59 S Essex Avenue; 8047-55 S Manistee Avenue; 7947-49 S Essex Avenue) (1.2).

Claims Administration & Objections

JRW 5.70 Work with J. Rak and vendor on claims distribution project (1.0); attention to responding to claimant inquiries (1.5); exchange correspondence with claimants' counsel regarding vendor contract (.1); exchange multiple drafts and comments regarding joint status report with counsel for claimants, M. Rachlis and K. Duff andrevise and finalize same for filing (3.1).

Claims Administration & Objections

KMP 1.50 Confer with J. Wine regarding issues relating to claimants' emails and research same (.5); further revise subpoena and correspondence to potential asset holder (.8); confer with K. Duff regarding same (.2).

Claims Administration & Objections

MR 1.50 Further attention to joint claims status report and conferences regarding same with J. Wine and K. Duff.

Claims Administration & Objections

SZ 1.10 Attention to filing of joint claims status report and communication with J. Wine about same.

Claims Administration & Objections

<u>Date</u>	Indiv Ho	ours Description
3/6/2021	JR	0.90 Upload inventory list and records related to claims project from the EquityBuild records.
		Claims Administration & Objections
3/8/2021	AEP	0.30 Review e-mail from J. Rak regarding assembly of all outstanding publicly recorded documents pertaining to various receivership properties and conduct follow up research regarding potential existence of as-yet unidentified EBF mortgage loans.
		Claims Administration & Objections
	JR	6.20 Exchange correspondence with J. Wine regarding adding claimants' counsel to claim distribution list (.6); update workbook with requested email contact content related to the claims distribution project (5.6).
		Claims Administration & Objections
	JRW	3.00 Work with J. Rak and vendor on claims distribution, opt outs, and adding counsel to email service lists (1.8); related email exchange with claimants' counsel (.2); review and correspond with K. Duff regarding responses to claimant inquiries (1.0).
		Claims Administration & Objections
3/9/2021	JR	6.70 Update workbook with requested email contact content related to the claims distribution project (6.1); exchange correspondence with IT consultant regarding preparation of EquityBuild electronic documents (.1); telephone call with K. Duff, J. Wine and IT consultant related to same (.5).
		Claims Administration & Objections
	JRW	3.90 Telephone conference with claimant's counsel regarding redline of vendor agreement (.4); review claims submitted by institutional lender against properties (6217-27 S Dorchester Avenue; 6250 S Mozart Street; 4611-17 S Drexel Boulevard; 7255-57 S Euclid Avenue) and adjacent properties (1414-18 East 62nd Place) and related correspondence with K. Duff and E. Duff (.5); work with J. Rak on adding counsel of record to property-specific email service lists (.5); related research and exchange with claimants' counsel regarding appearances (.3); telephone conference with K. Duff, J. Rak and IT consultants regarding EquityBuild documents (.9); attention to responding to claimant inquiries (1.3).
		Claims Administration & Objections
	KMP	0.20 Attention to message from claimant regarding claim documents and confer with J. Wine regarding same.
		Claims Administration & Objections

<u>Date</u>	<u>Indiv</u> <u>I</u>	<u>Hours</u>	Description
3/10/2021	JR	2.70	Review email from J. Wine and provide requested counsel of record information related to the claims distribution project (.2); review same and update worksheet related to the claims distribution project (2.5).
			Claims Administration & Objections
	JRW	1.50	Confer with J. Rak regarding email service lists for properties and counsel of record for same (.2); study institutional lender claim related to property (6217-27 S Dorchester Avenue; 1414-18 East 62nd Place), memoranda relating to priority, and related correspondence (1.1); telephone conference with counsel for claimants regarding claims process and title searches (.2).
			Claims Administration & Objections
3/11/2021	JR	0.50	Meeting with K. Duff and IT consultant regarding preparation of EquityBuild electronic records.
			Claims Administration & Objections
	JRW	2.80	Review draft proposal for resolution of properties with single claims, hearing transcript and notes (.4), related conference with K. Duff and M. Rachlis (1.5), and exchange correspondence with A. Porter regarding same (.1) (1017 W 102nd Street; 1516 E 85th Place; 2136 W 83rd Street; 417 Oglesby Avenue; 7922 S Luella Avenue; 7925 S Kingston Avenue; 8030 S Marquette Avenue; 8104 S Kingston Avenue; 8403 S Aberdeen Street; 8529 S Rhodes Avenue; 9212 S Parnell Avenue; 10012 S LaSalle Avenue; 11318 S Church Street; 3213 S Throop Street; 406 E 87th Place; 6554 S Rhodes Avenue; 6825 S Indiana Avenue; 7210 S Vernon Avenue; 7712 S Euclid 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; 6759 S Indiana Avenue); confer with S. Zjalic regarding claims review (.1); attention to claimant inquiries (.2); study revised vendor agreement and related correspondence with claimants' counsel (.5).
			Claims Administration & Objections
	MR	1.90	Participate in call regarding single claims issues (1.5); review material regarding same (.4).
			Claims Administration & Objections
	SZ	0.40	Email communication with J. Wine regarding update on review of properties (1700-08 W Juneway Terrace; 5450-52 S Indiana Avenue; 7749-59 S Yates Boulevard; 6160-6212 S Martin Luther King Drive; 6437-41S Kenwood Avenue; 8100 S Essex Avenue; 5955 S Sacramento Avenue; 6001-05 S Sacramento Avenue; 7026-42 S Cornell Avenue; 7237-43 S Bennett Avenue; 701-13 S 5th Avenue, Maywood; 11117-11119 S Longwood Drive; 7834-44 S Ellis Avenue; 4611-17 S Drexel Boulevard).
			Claims Administration & Objections
3/12/2021	AEP	1.00	Teleconference with K. Duff and J. Wine regarding strategy for analyzing claims.

Claims Administration & Objections

3/12/2021 JRW

1.70 Conference with A. Porter, and K. Duff regarding single-claim properties and EBF mortgagees (1.1), related correspondence with claimants' counsel (.1), and review records on Recorder of Deeds site and related correspondence to K. Duff and A. Porter (.4) (1017 W 102nd Street; 1516 E 85th Place; 2136 W 83rd Street; 417 Oglesby Avenue; 7922 S Luella Avenue;7925 S Kingston Avenue; 8030 S Marquette Avenue; 8104 S Kingston Avenue; 8403 S Aberdeen Street; 8529 S Rhodes Avenue; 9212 S Parnell Avenue; 10012 S LaSalle Avenue; 11318 S Church Street; 3213 S Throop Street; 406 E 87th Place; 6554 S Rhodes Avenue; 6825 S Indiana Avenue; 7210 S Vernon Avenue; 7712 S Euclid 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; 6759 S Indiana Avenue); correspond with K. Duff regarding claims against single family residence portfolio (single family) (.1).

Claims Administration & Objections

KMP 0.20 Communication with EB team regarding correspondence from attorneys relating to tax lien (1102 Bingham (Houston, TX)).

Claims Administration & Objections

3/15/2021 JR

0.40 Telephone conference with K. Duff, J. Wine and IT consultant related to EquityBuild electronic records.

Claims Administration & Objections

**JRW** 

2.30 Telephone conference with K. Duff, J. Rak and IT consultant regarding preparation of electronic records for EB database vendor (.4); prepare for and telephone conference with claimant's counsel and K. Duff regarding process for the resolution of claims against properties (.5), and related legal research (.2) (1017 W 102nd Street; 1516 E 85th Place; 2136 W83rd Street; 417 Oglesby Avenue; 7922 S Luella Avenue; 7925 S Kingston Avenue; 8030 S Marquette Avenue; 8104 S Kingston Avenue; 8403 S Aberdeen Street; 8529 S Rhodes Avenue; 9212 S Parnell Avenue; 10012 S LaSalle Avenue; 11318 S Church Street; 3213 S Throop Street; 406 E 87th Place; 6554 S Rhodes Avenue; 6825 S Indiana Avenue; 7210 S Vernon Avenue; 7712 S Euclid 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; 6759 S Indiana Avenue); telephone conference regarding recovery and copying of EquityBuild devices for document database vendor (.5); study acquisition plan from database vendor and provide comments regarding same (.7).

Claims Administration & Objections

3/16/2021 JR

0.70 Exchange correspondence with IT consultant regarding preparation of EquityBuild electronic records (.6); review email from J. Wine and further exchange correspondence related to claimant's counsel's email update (.1).

Claims Administration & Objections

3/16/2021 JRW

0.50 Correspondence from vendor regarding document database project (.1); confer with K. Duff regarding EquityBuild documents and cell phone records (.2); review list of properties from claimant's counsel and related correspondence with J. Rak (.2).

Claims Administration & Objections

KMP 0.20 Communications with K. Duff, J. Wine, and J. Rak regarding efforts to resolve tax lien on Houston property (1102 Bingham (Houston, TX)).

Claims Administration & Objections

3/17/2021 JR

3.00 Review email from K. Duff regarding contacting vendor and obtaining a license for opening various electronic records (.2); exchange correspondence with K. Pritchard and K. Duff regarding same (.1); contact vendor regarding same (.4); review email from J. Wine regarding updates to counsel email list for all lenders filing claims and update same (2.3).

Claims Administration & Objections

JRW 2.10 Exchange emails with claimants' counsel regarding service emails (.1); attention to responding to claimant inquiries (1.5); related email exchange with vendor regarding technical issues for claimant (.2); correspond with K. Duff and M. Rachlis regarding standard response to claimant inquiry regarding claims documentation (.3).

Claims Administration & Objections

MR 0.30 Attention to issues regarding response to claimant inquiry.

Claims Administration & Objections

3/18/2021 JR

1.40 Exchange correspondence with vendor and gather information for obtaining a license related to accessing electronic records (.5); exchange correspondence with K. Duff regarding same (.1); review email from J. Wine and update email list for claimants' counsel (.8).

Claims Administration & Objections

JRW 2.30 Exchange correspondence with K. Duff regarding standard response to claimant inquiries (.3); study proof of claim and spreadsheet from claimant's counsel and correspondence regarding same (.6); exchange correspondence with J. Rak and documents vendor regarding distribution of claim forms (.5); attention to investigating and responding to claimant inquiries (.9).

Claims Administration & Objections

Date Indiv Hours Description

**JRW** 

3/19/2021 JR 2.30 Update email list for claimants' counsel (.2); update lender email list (2.1).

Claims Administration & Objections

3.90 Exchange correspondence with document vendor regarding updates to emails (.2); work with J. Rak on updates to contact spreadsheet (1.2); research claim forms regarding address anomaly on master claims list and related exchange with J. Rak (.3); telephone conference with claimants' counsel regarding process for single-claim properties (.8) and related review of spreadsheets regarding EBF mortgagees (.2) (1017 W 102nd Street; 1516 E 85th Place; 2136 W 83rd Street; 417 Oglesby Avenue; 7922 S Luella Avenue: 7925 S Kingston Avenue: 8030 S Marguette Avenue: 8104 S Kingston Avenue; 8403S Aberdeen Street; 8529 S Rhodes Avenue; 9212 S Parnell Avenue; 10012 SLaSalle Avenue; 11318 S Church Street; 3213 S Throop Street; 406 E 87th Place; 6554 S Rhodes Avenue; 6825 S Indiana Avenue; 7210 S Vernon Avenue; 7712 S Euclid Avenue; 8107 S Kingston Avenue; 8346 S ConstanceAvenue; 8432 S Essex Avenue; 8517 S Vernon Avenue; 2129 W 71st Street; 9610 S Woodlawn Avenue; 6759 S Indiana Avenue); review proofs of claim and email correspondence regarding claimants and related correspondence with J. Rak and A. Watychowicz regarding necessary revisions to master list of lenders and contact sheets (.5); attention to claimant inquiries and drafting standard response regarding claimant IDs (.7).

Claims Administration & Objections

3/22/2021 JRW

1.70 Exchange correspondence with A. Watychowicz regarding claimant records (.1); confer with J. Rak regarding database updates (.2); attention to responding to claimant inquiries and related correspondence to K. Duff (1.3); exchange correspondence with claimants' counsel regarding requested extension (.1).

Claims Administration & Objections

3/23/2021 JR

2.50 Review emails from J. Wine pertaining to claimant request for email and address updates (.6); exchange further communication with J. Wine regarding same and complete all updates to claimant information on various workbooks (1.9).

Claims Administration & Objections

JRW 5.20 Work with J. Rak on updating lender and counsel emails, adding funds to claims distribution contact list, and related correspondence to document vendor (2.3); research recorder of deeds site and claim submission regarding purported single claim properties identified by claimant and update spreadsheet regarding same (1017 W 102nd Street; 1516 E 85th Place; 2136 W 83rd Street; 417 Oglesby Avenue; 7922 S Luella Avenue; 7925 S Kingston Avenue; 8030 S Marquette Avenue; 8104 S Kingston Avenue; 8403 S Aberdeen Street; 8529 S Rhodes Avenue; 9212 S Parnell Avenue; 10012 S LaSalle Avenue; 11318 S Church Street; 3213 S Throop Street; 406 E 87th Place; 6554 S Rhodes Avenue; 6825 S Indiana Avenue; 7210 S Vernon Avenue; 7712 S Euclid 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; 6759 S Indiana Avenue) (2.5); exchange

correspondence with collections counsel regarding collection notice (6250 S Mozart Street) (.4).

Claims Administration & Objections

3/23/2021 NG

2.50 Review and analyze email accounts relating to two properties (6749-59 S Merrill Avenue; 7110 S Cornell Avenue), and sent findings to K. Duff and A. Porter.

Claims Administration & Objections

3/24/2021 JRW

1.60 Confer with documents vendor regarding duplication of emails (.1); conference with K. Duff and M. Rachlis regarding request for claims forms (.5); review and revise draft correspondence to claimants' counsel regarding same (.6); review documents relating to claims (6749-59 S Merrill Avenue; 7110 S Cornell Avenue) and related exchange of correspondence with K. Duff and N. Gastevich (6749-59 S Merrill Avenue; 7110 S Cornell Avenue) (.4).

Claims Administration & Objections

0.50 Conference regarding claimants' counsel request for claims records with K. Duff and J. Wine.

Claims Administration & Objections

3/25/2021 AEP

MR

0.50 Read all e-mail correspondence and documents relating to competing claims against receivership property (6217-27 S Dorchester Avenue), and related communication with K. Duff and J. Wine (.3); review e-mail regarding accounts receivable correspondence from institutional lender and prepare response to J.Wine and K. Duff (.2).

Claims Administration & Objections

JRW

2.10 Research claimant loan files (3074 Cheltenham Place; 7625-33 S East End Avenue; 7635-43 S East End Avenue; 7750-58 S Muskegon Avenue; 7201 S Constance Avenue) and related correspondence with K. Duff (.2); exchange correspondence with K. Duff and A. Porter regarding claims against properties (1414-18 East 62nd Place; 6217-27 S Dorchester Avenue)(.3); exchange correspondence with vendor regarding project (.1); correspondence with vendor regarding license agreement and related correspondence to K. Duff and J. Rak regarding EquityBuild documents (.2); email exchange with K. Duff regardingreview of documents and related exchange with A. Porter and K. Duff regarding investigation regarding claims (6749-59 S Merrill Avenue; 7110 S Cornell Avenue) (.2); review and revise draft correspondence to claimant's counsel (.2); correspondence with K. Duff regarding claimant inquiries and responding to same (.8); correspond with vendor regarding claimant issue (.1).

Claims Administration & Objections

3/26/2021 JRW

5.00 Work with J. Rak on providing updates to database vendor (.2); review and revise draft email to claimants regarding claims process (1.1); work with K. Duff on response to claimant inquiries about claims documentation (.5); attention to claimant inquiries (3.1); correspondence with documents vendor regarding claimant emails (.1).

Claims Administration & Objections

3/27/2021 MR

0.50 Review letter to claimants' counsel regarding request for claims records.

Claims Administration & Objections

3/29/2021 JR

0.20 Review email from J. Wine related to claimant email and address update, make recommended changes and send request to claims vendor.

Claims Administration & Objections

JRW

1.60 Review claims documentation and work with vendor regarding adjustments to database (.6); investigate and respond to claimant inquiries (1.0).

Claims Administration & Objections

3/30/2021 JRW

0.80 Attention to researching and responding to claimant inquiries.

Claims Administration & Objections

3/31/2021 JRW

3.20 Exchange correspondence with document vendor regarding claims distribution project (.3); attention to researching and responding to claimant inquiries and related communications with K. Duff (1.6); study chart from claimants' counsel and related analysis to K. Duff (.4) and continue analyzing claims against properties (.9) (1017 W 102nd Street; 1516 E 85th Place; 2136 W 83rd Street; 417 Oglesby Avenue; 7922 SLuella Avenue; 7925 S Kingston Avenue; 8030 S Marquette Avenue; 8104 SKingston Avenue; 8403 S Aberdeen Street; 8529 S Rhodes Avenue; 9212 S Parnell Avenue; 10012 S LaSalle Avenue; 11318 S Church Street; 3213 S Throop Street; 406 E 87th Place; 6554 S Rhodes Avenue; 6825 S Indiana Avenue; 7210 S Vernon Avenue; 7712 S Euclid 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; 6759 S Indiana Avenue).

Claims Administration & Objections

<u>Date</u>	Indiv Ho	ours D	escription	
SUBTOTAL:			[121.60	27194.50]
Tax Issues		_		
3/8/202	1 KMP	0.30	Research files to locate entity tax filings and identify tax id number and communicate with K. Duff and accountant regarding same.	ers for entity
			Tax Issues	
3/29/202	21 JR	0.40	Review email from K. Duff related to tax return and sold properti exchange correspondence with K. Duff and accountant regardin preparation of tax returns related to sold properties(.3).	
			Tax Issues	
	KMP	0.20	Forward 2018 and 2019 Receivership tax returns to K. Duff and accountant.	
			Tax Issues	
SUBTOTAL:			[ 0.90	126.00]
			210.70	\$48,200.00

Other Charges			
	Description	_	
Business Operations			
	Fee for production of documents responsive to subpoena	)	425.00
	Software license fees for March 2021 (Summit Hosting, \$266.50; Google Suite, \$96.37)		362.87
	Online research for March 2021		75.10
SUBTOTAL:		[	862.97]
Total Other Charges			\$862.97

Summary of Activity

Hours	Rate	
76.10	260.00	\$19,786.00
69.60	140.00	\$9,744.00
21.50	140.00	\$3,010.00
3.00	95.00	\$285.00
1.50	110.00	\$165.00
24.30	390.00	\$9,477.00
4.80	390.00	\$1,872.00
9.90	390.00	\$3,861.00
-	76.10 69.60 21.50 3.00 1.50 24.30 4.80	76.10 260.00 69.60 140.00 21.50 140.00 3.00 95.00 1.50 110.00 24.30 390.00 4.80 390.00

### **SUMMARY**

Legal Services	\$48,200.00
Other Charges	\$862.97
TOTAL DUE	\$49,062.97

# 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.208981

Date 04/09/2021 Client No.BW10753

Services rendered in the month of January, 2021 per attached detail.

G. Castaldi 12.50 hours @ \$110 \$ 1,375.00

D. Arce 2.25 hours @ \$ 68 153.00

Current Amount Due \$ 1,528.00

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

PAYMENT DUE UPON RECEIPT

# Case: 1:18-cv-05587<u>, Dar 41</u>089414#E&93476UEBARC: AE/EA7ERSHR 76801859.06 1.62 PageID #:32438

ENG	DATE	EMPLOYEE	CAT	SUBCAT	SERVICE	MEMO	HOURS	BILLED	ADJUSTED
001 001 001	1/8/2021 1/12/2021 1/27/2021	Arce Arce Castaldi	ACCTG ACCTG ACCTG	CWU CWU CWU	4200 4200 4235	Monthly reports September Reports October Property Statements/ Compiling	1.25 1.00 3.00	85.00 68.00 330.00	0.00 0.00 0.00
001	1/4/2021	Castaldi	ACCTG	CWU	4235	data for Oct/Nov/Dec August/ September	2.50	275.00	0.00
001	1/18/2021	Castaldi	ACCTG	CWU	4235	property statements September Property Statements	1.00	110.00	0.00
001	1/15/2021	Castaldi	ACCTG	CWU	4235	Statements September Property Statements	0.50	55.00	0.00
001	1/5/2021	Castaldi	ACCTG	CWU	4235	Statements September Property Statements	1.25	137.50	0.00
001	1/8/2021	Castaldi	ACCTG	CWU	4235	September Property Statements	1.25	137.50	0.00
001	1/14/2021	Castaldi	ACCTG	CWU	4235	September property statements	3.00	330.00	0.00
						-	14.75	1,528.00	0.00
						Invoice Reconciliation			
						Billed WIP Adjusted Progress Amount		1,528.00 0.00 0.00	
						Gross Amount (Apply Prior Progress) Sales Tax (Sales Tax Applied)		1,528.00 0.00 0.00 0.00	
						Net Invoice		1,528.00	

## 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.208982

Date 04/09/2021 Client No.BW10753

Services rendered in the month of February, 2021 per attached detail.

B. Fish 1.25 hour @ \$110 \$ 137.50

G. Castaldi 13.75 hours @ \$110 1,512.50

Current Amount Due \$<u>2,211.00</u>

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

PAYMENT DUE UPON RECEIPT

# Case: 1:18-cv-05587, DOC+108924;#EQ9376UFBAC REVENUE R

ENG	DATE	EMPLOYEE	CAT	SUBCAT	SERVICE	MEMO	HOURS	BILLED	ADJUSTED
004	0/0/0004	A	10070	OVA/ILI	4000	Mandahanana	4.00	00.00	0.00
001	2/2/2021 2/4/2021	Arce Arce	ACCTG ACCTG	CWU	4200 4200	Monthly reports	1.00 4.00	68.00 272.00	0.00 0.00
001 001	2/4/2021	Arce	ACCTG	CWU	4200 4200	Monthly reports Reports	4.00 1.25	85.00	0.00
001	2/9/2021	Arce	ACCTG	CWU	4200	Monthly reports	2.00	136.00	0.00
001	2/9/2021	Castaldi	ACCTG	CWU	4235	October property	3.50	385.00	0.00
001	2/0/2021	Odotalai	7.0010	00	1200	statements	0.00	000.00	0.00
001	2/10/2021	Castaldi	ACCTG	CWU	4235	October property	4.00	440.00	0.00
						statements			
001	2/11/2021	Castaldi	ACCTG	CWU	4235	October property	2.50	275.00	0.00
						statements			
001	2/5/2021	Castaldi	ACCTG	CWU	4235	October property	2.25	247.50	0.00
						statements			
001	2/17/2021	Castaldi	ACCTG	CWU	4235	October Property	1.50	165.00	0.00
004	0/0/0004	<b>-</b>		0)4// 1	1000	statements	4.05	407.50	0.00
001	2/8/2021	Fish	ACCTG	CWU	4200	updated insurance	1.25	137.50	0.00
						spreadsheet for oct-dec 2020			
						2020			
						<del>-</del>			<u> </u>
							23.25	2,211.00	0.00
								,	
						Invoice Reconciliation			
						Billed WIP		2,211.00	
						Adjusted		0.00	
						Progress Amount		0.00	
						3			
						Gross Amount		2,211.00	
						(Apply Prior Progress)		0.00	
						Sales Tax		0.00	
						(Sales Tax Applied)		0.00	
						Net Invoice		2,211.00	

## 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.208983

Date 04/09/2021 Client No.BW10753

Services rendered in the month of March, 2021 per attached detail.

G. Castaldi 9.50 hours @ \$110 \$ 1,045.00

D. Arce 12.75 hours @ \$ 68 867.00

Current Amount Due \$<u>2,214.50</u>

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

PAYMENT DUE UPON RECEIPT

# Case: 1:18-cv-05587, Dec 41:08931;# E & 37-10-Eiland: AE/EIJ-PERSH PARK 1854.01 162 PageID #:32442

ENG	DATE	EMPLOYEE	CAT	SUBCAT	SERVICE	MEMO	HOURS	BILLED	ADJUSTED
004	0/0/0004	<b>A</b>	10070	0)4// /	4000	Devents	4 75	440.00	0.00
001	3/8/2021	Arce	ACCTG ACCTG	CWU	4200	Reports	1.75 2.25	119.00	0.00
001 001	3/9/2021 3/4/2021	Arce Arce	ACCTG	CWU	4200 4200	Reports Monthly reports	2.25 3.75	153.00 255.00	0.00 0.00
001	3/5/2021	Arce	ACCTG	CWU	4200	Monthly reports	1.25	255.00 85.00	0.00
001	3/2/2021	Arce	ACCTG	CWU	4200	Monthly reports	3.75	255.00	0.00
001	3/22/2021	Castaldi	ACCTG	CWU	4235	November property	0.50	55.00	0.00
001	3/22/2021	Castalui	ACCIG	CVVO	4233	statements	0.50	33.00	0.00
001	3/3/2021	Castaldi	ACCTG	CWU	4235	October property	1.25	137.50	0.00
						statements.			
001	3/15/2021	Castaldi	ACCTG	CWU	4235	November Property Statements	2.50	275.00	0.00
001	3/16/2021	Castaldi	ACCTG	CWU	4235	November property	5.25	577.50	0.00
001	3/10/2021	Castalui	ACCIG	CVVO	4233	statements	5.25	377.30	0.00
001	3/29/2021	Weinberg	ACCTG	CWU	4235	Phone w/ K Duff re:	0.20	55.00	0.00
						property sales			
001	3/30/2021	Weinberg	ACCTG	CWU	4235	Zoom mtg re: property	0.90	247.50	0.00
						sales & tAX effects			
						_			
							23.35	2,214.50	0.00
						Invoice Reconciliation			
						Dille 4 M/ID		0.044.50	
						Billed WIP		2,214.50 0.00	
						Adjusted		0.00	
						Progress Amount		0.00	
						Gross Amount		2,214.50	
						(Apply Prior Progress)		0.00	
						Sales Tax		0.00	
						(Sales Tax Applied)		0.00	
						Net Invoice		2,214.50	

# Exhibit I

#### Case: 1:18-cv-05587 Document #: 993-1 Filed: 05/17/21 Page 156 of 162 PageID #:32444



Due Date:

4123 Lankershim Boulevard North Hollywood, CA 91602

Tax Administrator Appointment Date:

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

02/18/2020

Invoice: 526323 SEC E.A. reference:

ID: 3077400 SEC/DC Case Number: 1:18-cv-05587

Date: 02/18/2020 Responsible Party for Payment:

For professional services rendered as follows: SEC DATE **SERVICE STAFF** RATE HOURS **AMOUNT** General Consulting Services - General Consulting 01/10/2019 Discussions/Meetings **JMD** 440.000 0.70 308.00 Prepare for and attend kick off call. 01/10/2019 Discussions/Meetings JD 440.000 1.00 440.00 Participate in conference call 01/22/2019 Discussions/Meetings 440.000 660.00 JMD 1.50 Prepare for and attend conference call. Review prior notes and open issue on the entities and tax returns. 01/22/2019 Discussions/Meetings JD 440.000 0.25 110.00 Conference call Information Return Reporting Services - Information Return Reporting 01/23/2020 Forms Review AM 140.000 0.20 28.00 01/29/2020 Produce Forms **JAC** 168.000 0.20 33.60 Preparation of Forms 1099-MISC. Qualified Settlement Fund Services - Form 8842 04/13/2019 Preparation **JGM** 204.000 0.10 20.40 Prepare form 8842. Qualified Settlement Fund Services - Estimated Taxes 12/10/2018 Intake FR 152.000 0.10 15.20 Request statements. 20.40 12/10/2018 Preparation **JGM** 204.000 0.10 Quarterly estimated tax payments 2018 Q4. 12/11/2018 122.40 Preparation **JGM** 204.000 0.60 Quarterly estimated tax payments 2018 Q4. 12/12/2018 142.80 Preparation **JGM** 204.000 0.70 Quarterly estimated tax payments 2018 Q4. 04/10/2019 Preparation **JGM** 204.000 0.40 81.60

> O. 818.769.2010 / F. 818.769.3100 / FED EIN 95-2036255 MILLERKAPLAN.COM

Miller Kaplan Arase LLP Page 2 of 3 Quarterly estimated tax payments 2019 Q1. 06/04/2019 Preparation **JGM** 204.000 0.50 102.00 Quarterly estimated tax payments 2019 Q2. 09/09/2019 Preparation **JGM** 204.000 0.20 40.80 Quarterly estimated tax payments 2019 Q3. 09/10/2019 **JGM** 204.000 326.40 Preparation 1.60 Quarterly estimated tax payments 2019 Q3. 09/12/2019 **JGM** 204.000 2.40 489.60 Preparation Quarterly estimated tax payments 2019 Q3. 09/13/2019 Preparation **JGM** 204.000 285.60 1.40 Quarterly estimated tax payments 2019 Q3. 12/03/2019 Preparation **JGM** 212.000 0.20 42.40 Quarterly estimated tax payments 2019 Q4. 12/03/2019 Preparation JGM 212,000 0.40 84.80 Quarterly estimated tax payments 2019 Q4. Qualified Settlement Fund Services - Tax Return 09/06/2018 ER 72.00 144.000 0.50 TIN documentation from K. Duff, adjustments to name, and new client processes. 01/28/2019 Preparation **JGM** 204.000 183.60 0.90 Preparation and filing of the 2018 Qualified Settlement Fund Income Tax Return. 04/09/2019 Preparation 102.00 JGM 204.000 0.50 Preparation and filing of the 2018 Qualified Settlement Fund Income Tax Return. 04/15/2019 Preparation ER 152.000 0.25 38.00 Extension filing. 01/28/2020 169.60 Preparation JGM 212.000 0.80 Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return. Qualified Settlement Fund Services - Tax Return 01/23/2020 Preparation **JAC** 168.000 0.25 42.00 Preparation of the 2019 Qualified Settlement Fund Income Tax Return. Preparation **JAC** 01/29/2020 168.000 0.90 151.20 Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return. 01/30/2020 Preparation **JAC** 168.000 1.10 184.80 Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return. 02/05/2020 Preparation JAC 168,000 0.10 16.80 Preparation and filing of the 2019 Qualified Settlement Fund Income Tax Return. **Total for Services** 4,314.00 Charges Information Return Reporting Services - Information Return Reporting

0.000

**Total for Charges** 

Invoice Total

50.00

50.00 \$4,364.00

01/31/2020

Information Reporting

Form 1099

Miller Kaplan Arase LLP Page 3 of 3

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

 02/18/2020
 01/31/2020
 12/31/2019
 11/30/2019
 10/31/2019+
 Total

 4,364.00
 0.00
 0.00
 0.00
 \$4,364.00



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: 540802 SEC E.A. reference:

ID: 3077400 SEC/DC Case Number: 1:18-cv-05587

Date: 05/07/2021 Responsible Party for Payment:

Due Date: 05/07/2021 Tax Administrator Appointment Date:

For professional services	rendered as follows:		SEC			
DATE	SERVICE	STAFF	DISCOUNT RATE	<u>HOURS</u>	<u>AMOUNT</u>	
Information Return Re	eporting Services - Information Return Reporting	g				
02/08/2021	Finalize Payees & Amounts	JAC	180.000	0.30	54.00	
	Preparation of Forms 1099-MISC.					
02/08/2021	Produce Forms	JAC	180.000	0.25	45.00	
	Preparation of Forms 1099-MISC.					
02/08/2021	Release for Agency Filing	ER	160.000	0.10	16.00	
	Forms 1099-MISC and 1099-NEC.					
Qualified Settlement Fund Services - Tax Return						
01/29/2021	Preparation	JAC	180.000	0.30	54.00	
	Preparation and filing of the 2020 Qualified Settlement Fund Income Tax Return.					
02/04/2021	Preparation	JAC	180.000	0.20	36.00	
	Preparation of the 2020 Qualified Settlement Fund Income Tax Return.					
02/08/2021	Preparation	JAC	180.000	3.70	666.00	
	Preparation and filing of the 2020 Qualified Settlement Fund Income Tax Return.					
Qualified Settlement F	Fund Services - Tax Return					
03/17/2021	Preparation	JAC	180.000	2.35	423.00	
	Preparation and filing of the 2020 Qualified Settlement Fund Income Tax Return.					
03/30/2021	Discussions/Meetings	JD	440.000	0.75	330.00	
	Conference call re tax issues					
		Total fo	or Services		1,624.00	
		Invoice	Total		\$1,624.00	

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

O. 818.769.2010 / F. 818.769.3100 / FED EIN 95-2036255 MILLERKAPLAN.COM Miller Kaplan Arase LLP Page 2 of 2

#### 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

 05/07/2021
 04/30/2021
 03/31/2021
 02/28/2021
 01/31/2021+
 Total

 1,624.00
 0.00
 0.00
 0.00
 9,967.20
 \$11,591.20

# Exhibit J



# **Invoice**

BILL TO			
EquityBuild Kevin Duff			

DATE	INVOICE#
4/14/2021	12567

TERMS	PROJECT		
DESCRIPTIO		DATE	AMOUNT

QUANTITY	SERVICED	DESCRIPTION	RATE	AMOUNT
0.5	1/22/2021	Uploaded file for EquityBuild to the website.	110.00	55.00
2	1/26/2021	Started working on getting emails together for Ania. Created folders and started searches.	110.00	220.00
4	1/27/2021	Continued working on list of email searches for Ania.	110.00	440.00
3	1/28/2021	Talked with Ania about her calendar invites not updating. It seemed to resolve itself over night.	110.00	330.00
		Continued working on search inquiry for EquityBuild. Finished them up and told Ania how to retrieve the folder.		
2	1/29/2021		110.00	220.00
_	2/3/2021	Finished up copying emails over to folders.	110.00	55.00
	2/8/2021	Created 2 website entries for Equitybuild page.  Added info to claims on website.	110.00	27.50
			110.00	110.00
	3/1/2021	Uploaded files to EquityBuild website.	1	
1.5	3/10/2021	Work with Nate on files that are not copying over properly. Figure out how to get to bottom of that and work with utility like ROBOCOPY to make list of skipped files.	110.00	165.00
5	3/12/2021	Onsite visit. Started copy of the new data on hard drive given. Took back original hard drive to clone. Cloned all data and moved over folders as Justina had it. Did another clone to 2nd hard drive. Remotely looked at copy to drives 3 and 4 for new hard drive given.	110.00	550.00
2.5	3/15/2021	Dropped off hard drives. Made copy of phone data to Justyna's hard drive and other hard drives.  Conference call with Kevin, Jodi and Jonathan.	110.00	275.00
1.75	3/16/2021	Worked with Justyna to make sure all EB files were correct on 8TB. She gave me inventory list, which I went over and returned to her with my thoughts. Made modification to all external hard drives. Kevin texted about EB 3 hard drive.	110.00	192.50
1	3/26/2021	Make copy of Laptop info to Seagate HD.	110.00	110.00
		Illinois Sales Tax	10.25%	0.00

Thank you for your business.

**Total** \$2,750.00