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 COMBINED REPLY IN SUPPORT OF FEE ALLOCATION MOTION

Michael Rachlis
Jodi Rosen Wine
Rachlis Duff & Peel, LLC
542 South Dearborn Street, Suite 900
Chicago, IL 60605
Phone (312) 733-3950
mrachlis@rdaplaw.net
jwine@rdaplaw.net

Attorneys for Kevin B. Duff, Receiver

Table of Contents

Table	of Autl	horities		ii
INTR	RODUC'	TION		1
ARG	UMEN	Γ		4
I.	Legal	Standa	rd and the District Court's Prior Determination	4
II.	Recei	eiver's Responses to Objections		
	A.	The S	Substantive Objections Lack Merit and Any Errors Can Be Corrected	8
		1.	Improper Allocations Among Properties	8
		2.	General Receivership Activities	9
		3.	Claims Administration v. Multi-Claimant Dispute Resolution Procedure	:11
		4.	Comingling of Rents and Rent Restoration	.13
		5.	Credit Bidding	.15
		6.	Tasks not Equally Divisible	.17
		7.	Title Examination Charges	.18
		8.	Ambiguous Entries	.19
		9.	Claims Adjudication Litigation	.20
		10.	General Fee Allocation Deficiencies	.21
		11.	The Inadequacy of the Receiver's Explanations	.22
	B.	Addit	ional Objections Applicable to Single-Claim Properties	.23
	C.	The F	FHFA Objections Should Be Overruled	.28
III.	CON	CLUSI	ON	.33

Table of Authorities

Bender v. CenTrust Mtg. Corp., 833 F. Supp. 1540 (S.D. Fla. 1992)	32 n.16
Berezovsky v. Moniz, 869 F.3d 923 (9th Cir. 2017)	32
Bhatti v. FHFA, 15 F.4th 848 (8th Cir. 2021)	32 n.16
Collins v. Yellen, 141 S. Ct. 1761 (2021)	29
Cty. of Leon v. FHFA, 700 F.3d 1273 (11th Cir. 2012)	30
Cty. of Sonoma v. FHFA, 710 F.3d 987 (9th Cir. 2013)	30
Donovan v. Robbins, 588 F. Supp. 1268 (N.D. Ill. 1984)	28
Ester v. Principi, 250 F.3d 1068 (7th Cir. 2001)	30
First Western Savings and Loan Ass'n v. Anderson, 252 F.2d 544 (9th Cir. 1958)	26 n.15
Gaskill v. Gordon, 27 F.3d 248 (7th Cir. 1994)	4
In re Cascade Hydraulics & Utility Service, Inc., 815 F.2d 546 (9th Cir. 1987)	26 n.15
In re River Oaks Ltd. P'ship, 166 B.R. 94 (E.D. Mich. 1994)	26 n.15
Irving Independent School District v. Packard Properties, 970 F.2d 58 (5th Cir. 1992)	32
Jacobs v. FHFA, 908 F.3d 884 (3d Cir. 2018)	
Lowder v. All Star Mills, Inc., 354 S.E.2d 765 (N.C. App. 1987)	

Matter of Trim-X, Inc., 695 F.2d 296 (7th Cir. 1982)	26 n.15
Montgomery County Comm'n v. FHFA, 776 F.3d 1247 (11th Cir. 2105)	32
Perry Capital LLC v. Mnuchin, 864 F.3d 591 (D.C. Cir. 2017)	29, 30, 32
Roberts. v. FHFA, 889 F.3d 397 (7th Cir. 2018)	32
Robinson v. FHFA, 876 F.3d 220 (6th Cir. 2017)	32
SEC v. Elliott, 953 F.2d 1560 (11th Cir. 1992)	passim
SEC v. First Securities Co. of Chicago, 528 F.2d 449 (7th Cir. 1976)	1
Other Authorities	
12 U.S.C. § 4617(a)(2)	29
12 U.S.C. § 4617(b)(2)(B)(ii-iv)	29
12 U.S.C. § 4617(b)(2)(D)	29
12 U.S.C. § 4617(b)(2)(E)	29
12 U.S.C. §4617(b)(2)(D)(ii)	31
12 U.S.C. §4617(f)	29, 30

INTRODUCTION

As the Receiver recently noted (Dkt. 1182), the District Court has approved the Receiver's fees, found them beneficial to the Estate, approved two particular categories for an interim payment pursuant to the Receiver's lien, and directed the Magistrate Judge to address the Receiver's Fee Allocation Motion. The Receiver has undertaken a substantial and earnest effort to fairly, reasonably, and accurately allocate fees for those approved billing categories to the properties that benefitted from corresponding efforts. The Receiver's allocation tables for each of the 108¹ properties comply with the Court's orders and follow the Court's approved allocation methodology. (Dkt. 824, at 5) In reviewing the Receiver's allocations, the District Court did not direct this Court "to perform the impossible," nor does applicable law require it to do so. *See SEC v. Elliott*, 953 F.2d 1560, 1578 (11th Cir. 1992). Rather, the Court is called upon to review the Receiver's allocations between the properties both consistent with the District Court's approved methodology and "on the best basis it can determine." *Id.* (citations omitted).

Virtually all of nearly 900 claimants have not objected to the Receiver's proposed allocations. (*See* Dkt. 1184) Nor has the SEC objected. *See*, *e.g.*, *SEC* v. *First Securities Co. of Chicago*, 528 F.2d 449, 451 (7th Cir. 1976) ("In securities law receiverships, the position of the Securities and Exchange Commission in regard to the awarding of fees will be given great weight."). The only objection is from the institutional lenders who typically oppose the Receiver's

¹ While there were 116 properties in the Estate, there are 108 allocation tables because two groups of adjacent properties are treated as one for allocation purposes (*i.e.*, 7927-49 Essex and 8326-58 Ellis), rather than as five and four separate properties, respectively, and another (*i.e.*, 1050 8th Avenue in Naples, Florida) was not part of the EquityBuild businesses, was the personal residence of Jerry Cohen, the proceeds from its sale went into the Receiver's account and not into a separate property account, and all allocations relating to the property have been deferred.

efforts, and continue in that fashion with their current opposition, despite this Court's caution about the benefit and efficacy of doing so. (Dkt. 1184)

The lack of objections by the overwhelming number of claimants and SEC recognizes the efforts made by the Receiver relative to these issues. Indeed, the SEC billing guidelines, which this Court has required the Receiver and his professionals to follow (Dkt. 16, ¶¶ 69, 73) require each professional and paraprofessional to record time in increments of tenths of an hour. While the objectors complain *inter alia*, that the fee for tasks should not be equally divided among groups of properties, the irony of the objectors' position is that, had the Receiver and his counsel entered time separately for each benefitted property, the total fees allocated to each property would be significantly larger.² Moreover, what is abundantly clear from the Receiver's detailed allocations is that the Receiver did not simply divide all fees across all properties. Were that done, quite obviously, there would be no need for each property to have its own unique allocation table. The Receiver's work shows that extensive efforts were taken to allocate each task to properties that received the benefits. Undeterred, the objectors repeatedly present examples that either represent fractional interests (including many that involve challenges amounting to only a few dollars) or are advocacy pieces rather than clear errors.

By contrast, the Receiver has devoted substantial efforts to present allocations that are accurate, fair, reasonable, and consistent with applicable law. To be sure, the Receiver is prepared, and requests leave, to correct allocation errors that actually exist, or to make them consistent with any ruling from the Court. (*See* Dkt. 1184) However, simply because the objectors wish to object

² Indeed, the allocation tables submitted with the Receiver's motion (Dkt. 1107) contain more than 250,000 fractional allocations that are less than a tenth of an hour, totaling \$1,117,924 in total fees. If these entries were billed separately to the properties at the smallest billing increment of one-tenth of an hour, the total fees would balloon to \$8,756,766, which of course has no relation to the actual fees, but does lay bare the irrationality and lack of substance of the objectors' positions.

to the Receiver's fees to an infinitesimal level and ask the Court to evaluate thousands of task descriptions in the Receiver's invoices does not make such review necessary or appropriate. "What is required is that an earnest effort be made to devise a method of allocating the actual costs of the receivership to specific assets...." *Elliott*, 953 F.2d at 1578. This is what the Receiver has done. And that is all that this Court is called upon to do.

The Receiver has already undertaken a substantial effort to remove or defer tasks that: (i) do not relate to the approved categories, (ii) did not relate to the properties or the secured claimants, or (iii) for which the determination of benefit is premature.³ In total, the Receiver excluded 7,831 tasks (25%) on one or more of these bases out of the 30,914 tasks in the first 13 fee applications (through 9/30/2021), including 1,799 tasks in the asset disposition, business operations, and claims billing categories (which are the three billing categories that most closely align with the categories that the District Court has approved for application of the receiver's lien). The Receiver reviewed the remaining tasks and added specific allocations for those that were not included in the original invoice description, a process that took several months to complete. In addition, as the Receiver has noted, the subject matter of most such tasks can be determined by reference to other information in the invoices, fee applications, fee allocation spreadsheets, or elsewhere in the record. (*See* Dkt. 1182, at 11-12) For example, most incremental tasks are part of a longer task narrative that breaks the tasks into their incremental parts. Some task narratives presume reference

The Receiver only considered tasks in the asset disposition, business operations, and claims billing categories and did not allocate *any* tasks in the billing categories for (a) accounting/auditing, (b) asset analysis and recovery, (c) case administration, (d) corporate finance, (e) employees, (f) investor communications, (g) status reports, or (h) tax issues. The also Receiver did not include any tasks relating to former properties (not owned by any EquityBuild entity at the commencement of the receivership) nor to the Cohen Naples residence (*see*, *supra*, note 1). One allocation to the Naples property is identified in the objection, which the Receiver will correct. (*See* Exhibit 1, Row 9)

to language in immediately preceding tasks or tasks in the same time frame, including by context or using phrases such as, "regarding same." In later fee applications, the Receiver and his retained professionals have attempted to avoid such phrases and provide more detail to make it easier for tasks to be considered independently. Similarly, specific allocation references in the task description itself are typically more common in later invoices than earlier invoices, which is another improvement made as the receivership progressed. In toto, the objectors overarching argument of a lack of detail fails, as do the other arguments raised and further discussed below.

ARGUMENT

I. Legal Standard and the District Court's Prior Determinations

The Court enjoys broad discretion for approving fees and determining how they will be paid, as the Court has repeatedly noted. *See, e.g.*, Dkt. 614 (at 2), 710 (at 2), & 824 (at 2); *see also Elliott*, 953 F.2d at 1577-78; *Gaskill v. Gordon*, 27 F.3d 248, 253 (7th Cir. 1994) ("[T]he court may consider all of the factors involved in a particular receivership in determining an appropriate fee."). Where a receiver is charged with the duty of preserving, managing, and liquidating various receivership properties, and the Court determines it is impossible or inappropriate to allocate each particular receivership task to the particular property for which it was incurred, it is fair and reasonable for the Court to use an allocation method based on the total value of the properties after liquidation as an indication of the amount of time and effort expended for the properties while in the receivership. *Lowder v. All Star Mills, Inc.*, 354 S.E.2d 765, 767 (N.C. App. 1987), *cited with approval by Elliott*, 953 F. 2d at 1578. In this case, where a specific allocation was not made, the Receiver used this type of approach, which is the methodology approved by the District Court. (Dkt. 824, at 5) Furthermore, absent a showing by the objectors that there is a better and more

feasible method of allocating fees, it is well within this Court's discretion to approve the Receiver's proposed allocations. *See, e.g., Lowder*, 354 S.E.2d at 767.

Indeed, here the District Court has already reviewed and/or is in the process of reviewing every fee petition and has considered all objections thereto. The District Court also has reviewed and approved the methodology for allocating fees to the encumbered properties and has now asked this Court to review the allocations for fee applications 1-13.⁴

The Receiver has undertaken an extensive effort to allocate to the individual properties those tasks that have already been approved by the District Court (through the 13th fee petition) falling within the two categories of activities that the Court determined to be beneficial to the properties and claimants, *i.e.*, "(1) the preservation, management, and liquidation of certain real estate belonging to the Receivership Estate; and (2) the implementation and management of an orderly summary claim-priority adjudication process." (Dkt. 1030, at 2, 11)

The Court stated "[a]s to the first category, the Court has repeatedly found that there has been a significant need for the Receivership assets to be managed by a neutral party until an orderly claims process is concluded, and the Receiver's efforts on that front have benefited and will continue to benefit the Receivership Estate." (*Id.* at 11 (citing, *e.g.*, Dkt. 824, at 3; Dkt. 710, at 3; Dkt. 614, at 3)) In finding such activities beneficial, the Court was relying not merely on the invoices corresponding to such work but also that, "over the past three years, the Receiver has documented in numerous filings his efforts to preserve, operate, maintain, and ultimately sell the

⁴ The District Court recently instructed that, "to the extent the Receiver requests that the Court authorize payments of his fees and expenses pursuant to the first-priority receiver's lien in the future, he should include details in each fee application concerning which line items he believes should be covered by the first-priority lien, and the Court will consider them together with the fee applications." (Dkt. 1213) But for purposes of the present motion, this Court has all allocations through Fee Application No. 13 which covers the period through September 30, 2021. (Dkt. 1107)

more than 100 properties in question, including addressing numerous health and safety issues (such as the more than two dozen open building code violations, as an example), overseeing significant repairs and improvements, paying the required real estate taxes, and litigating various state court actions involving the properties." (Dkt. 1030, at 11 (citing Dkt. 258, at 17-18; Dkt. 467, at 2-7; Dkt. 839, at 11-12)) And, based on this record, the Court found "that these activities benefited the Estate as a whole, as well as all of the creditors collectively." (*Id.*) In regards to the second category, the District Court also found that "[b]y developing and implementing the summary claim-priority adjudication process, the Receiver has conferred a similar benefit here, regardless of which claimant is determined to be the first-priority secured lienholder at the end." (*Id.* at 13)

In determining whether the Receiver's allocations between different properties are appropriate, the Court has correctly noted that mathematical precision is not required. (Dkt. 1184) The Court need not do the impossible. *Elliott*, 953 F. 2d at 1578. It may find that it is impossible to accurately allocate tasks between different properties. For such allocation work, the Court need only allocate the fees "on the best basis it can determine." *Id.* "What is required is that an *earnest effort* be made to devise a method of allocating the actual costs of the receivership to specific assets and that the order ... disclose the results of this effort." *Id.* (emphasis added).

II. Receiver's Responses to Objections

The objectors attach Exhibits B-G to their Response, which contain certain of the allocations from the schedules attached to the Receiver's filings to which the objectors have added their objections, either by color-coding the entry or in an inserted column:

Exhibit	Number of	
	Objections	
В	42,682	Lenders consolidated objections to 58 properties

⁵As a further measure of protection for possible errors, the District Court already imposed a 20% holdback of fees awarded pursuant to the Receiver's lien. (*See* Dkt. 1030, at 15)

		(5731 objections are listed in Exhibit B-1)
С	2,806	Liberty objections for #81, 4315 S Michigan
D	2,186	Citibank objections for #3, 5001 S Drexel ⁶
Е	3,122	General allocation objections
F	328	Sole Lien objections to specific allocations
G	188	Sole Lien objections to general allocations
Total	51,312	

All of the objectors adopt each of these objections as if asserted with respect to their collateral. (Response, at 8) It is not practicable (or necessary) for the Receiver or the Court to address each of over 50,000 objections. At a minimum, the number of objected-to entries exceeds 14,000 if Exhibit B-1⁷ is considered instead of Exhibit B.⁸

Accordingly, the Receiver responds through the general discussion above and by responding below to each type of objection lodged in response to the Receiver's motion set forth

⁶ Exhibit D was prepared by the objectors in PDF format and therefore cannot be filtered to determine the exact number of objections out of a total of 2,429 entries. It is clear that the Exhibit D objectors are not serious about differentiating between entries that they believe fall within the two categories identified by the Court and those that do not. Instead, from a visual review of the PDF exhibit, it appears that the objectors are taking the position that about 90% of the work done by the Receiver (approximately 2,186 of the 2,429 entries) should not be allocated to the properties, a position that is highly inconsistent with the Court's rulings.

⁷ The objectors describe Exhibit B-1, which contains 5,731 objections, as a summary of the objections in Exhibit B "so that only a single objection for an entry is identified even if that entry appears in more than one Property Report." (Response, at 7) A review of Exhibit B-1, however, shows that it is not a list of unique entries, contains many duplicates, and also contains some entries that appear to be missing from Exhibit B entirely. If Exhibit B-1 is considered instead of Exhibit B, the total number of objections is 14,361.

⁸ The objectors' Exhibit B contains a list of the properties that it purports to cover. The objections contained in the exhibit, however, include allocations to several properties not on the list (5450-52 S Indiana Avenue, 7749-59 S Yates Boulevard, 8214-16 S Ingleside Avenue). Additionally, the Objectors list two property number ranges with a single address (74-78 and 107-113). The Receiver confirmed with the objector's counsel that 107-113 is a typo and they intended to include only property 113 (7840-42 S Yates Avenue). The Receiver assumes that the objectors intended to include each of the five Group 1 properties (74-78), although only 7201 S Constance is included on the list.

below, generally utilizing the headings and/or subjects used by the objectors for ease of the Court's reference. The Receiver also attaches **Exhibit 1** to provide further responses to the specific examples in the objectors' Response. These responses address the specific categories of objections in their brief and the similar issues in their exhibits, just as the objectors have pointed to their examples in representative fashion.

A. The Substantive Objections Lack Merit and Any Errors Can Be Corrected.

1. Improper Allocations Among Properties

A review of the objections based on an improper allocation among properties shows that most of the objectors' examples are either incorrect or do not show a clear error by the Receiver. In those instances where an allocation error occurred, the Receiver will correct them.⁹ Review of their examples, which the objectors describe as "most egregious," shows that the objectors are in most instances simply wrong that the task was incorrectly billed to the wrong property. A discussion of those examples is attached as part of **Exhibit 1** (*see*, *e.g.*, Rows 3-26).

Additionally, review of the various exhibits submitted by the objectors show that they asserted an objection that a task was "misallocated" (Ex. B), "misplaced" (Ex. D) or a "different property was involved" (Ex. C) for a host of entries that were *properly allocated*. A sampling of these are as follows:

• The objectors claim that entries are allocated to the wrong property but they overlook that the allocation is to the alternate address of the same property (*see*, *e.g.*, Ex. B, rows 28942, 32738) (many properties, especially those on corners, often are known by two addresses)

⁹ The Receiver does not intend to improperly allocate any entry. As set forth below, certain errors were uncovered during the Receiver's review of the objections, and these errors will be corrected and the allocation spreadsheets regenerated, consistent with the Court's indication that the Receiver will be given an opportunity to do so. (Dkt. 1184) That is why, in September 2021, the Receiver shared drafts of the allocation spreadsheets with the objectors in advance of submitting them to the Court in December 2021. Despite the opportunity, and invitation by the Receiver, to bring errors to the Receiver's attention, they chose not to do so (*see* Dkt. 1182, at 6), only raising such issues now, a burden to the Receiver and the Court.

- 1/16/19 task (NM) described as "Revise motion to approve public sale process for second round of property sales and revise motion for court approval of the sale of the first round of properties and correspond with A. Porter regarding documents from title company for same (1.0)" was appropriately allocated to 12 properties involved in the second motion to approve process (Dkt. 130) and the 6 properties involved in the first motion to approve sale (Dkt. 230) (Ex. D at p. 43)
- 9/8/20 task (JRW) described as "confer with A. Porter and K. Duff regarding city violation notices (6327 S Kenwood, 5001 S Drexel) and related factual research (.6)" was appropriately allocated 1/2 to each of these properties (.3) (Ex. D, p. 139)
- 2/19/19 task (KBD) described as "study another lender objections to second motion to approve sale of properties" was correctly allocated to the six properties involved in the Receiver's *first* motion to approve sales. Despite the error in the task description, the objectors are aware that the Receiver's second motion to approve sales was not filed until September of 2019 (Dkt. 524), and that they themselves filed their objections with respect to the sale of 5001 S Drexel Avenue on February 19, 2019 (Dkt. 233) (Ex. D at p. 48)
- 7/14/20 task (AEP) described as "review first half of administrative and housing court litigation folders for accuracy and completeness in connection with final reconciliation and payment of municipal judgments (.9)" was correctly allocated to 39 properties, including 5001 S Drexel. The objectors complain that this property had already been sold, but there have been multiple notices of violations relating to this property that the Receiver has had to address, including a collections notice received as recently as 3/16/22 (Ex. D, p. 135)
- 4/27/19 task (AEP) described as "assemble revised title commitments for all eight remaining unsold properties in the first marketing tranche, compare special exceptions on revised commitments to special exceptions on prior commitments and update closing checklists accordingly (2.5)" was correctly allocated among those eight properties (Ex. D, p. 81)
- 5/2/19 task (JR) described as "review payment of real estate property taxes submitted by title company from sales of the first tranche" was correctly allocated to the six properties at issue (Ex. D, p. 89)
- 5/7/19 task (AEP) described as "Prepare pro forma title commitment for purchaser of receivership property (5001 S Drexel) and resolve closing scheduling issue (.4)" was appropriately allocated 100% to that property (Ex. D, p. 89)

2. General Receivership Activities

The objectors first argue that the task descriptions lack detail. (Response, at 2, 18, 19, 28) However, their argument that billing descriptions are not specific enough and that there is a need for more information was previously rejected by the Court. The District Court has consistently

overruled objections about the Receiver's fees purportedly lacking particularity and specificity. (See, e.g., Dkt. 1031, at 11 n.31) And an objection, now, that literally and figuratively highlights most of more than 23,000 tasks can hardly be considered particular and specific. The objectors also argue that many of the Receiver's allocations violate Elliott because they are an impermissible across-the-board allocation and lumping of time involving multiple "lenders," "managers" or "properties," without any specificity concerning the benefit to each secured collateral. (Response, at 12) But simply because the task entries use general terms does not mean that the allocations are insufficient, inaccurate, or not reflecting benefits to the properties. Such objections ignore the fact that the Receiver has gone back through the tasks to provide or refine allocations, including especially for instances where no allocation was initially provided or where the task description is of a more general nature. Put another way, if the task description uses a general term such as "various properties," and then there is an allocation to a specific group of properties, then the "various properties" are identified. The objectors simply ignore such supplemental or contextual information.

The objectors then argue that, in other instances, the allocations include time entries that make no mention of the particular property involved, such as: interviews of potential property managers and brokers; review of brokers/managers' proposals and compensation; general receivership strategy; and proposed liquidation plans. They argue this work deals with the general operation and administration of the receivership, rather than benefits conferred upon specific collateral. They provide a series of examples, for which the Receiver provides response in **Exhibit** 1 (*see*, *e.g.*, Rows 27-41) and which show the largely baseless nature of the objections.

Additionally, a review of the various exhibits filed with the Response shows that the objectors assert this objection against many activities the Court has deemed to fall within the first

category of fees and expenses for which the Court has held that the Receiver's lien takes priority over the liens of any and all secured creditors. (Dkt. 1030, at 11-12) For example, the objectors improperly object to work involving code violations (*see*, *e.g.*, Ex. B, rows 16771, 39894), communications with property managers regarding repair work (*id.*, rows 5204, 28866, 29108), communications with real estate brokers regarding sales (*id.*, rows 29308, 38536), and due diligence regarding sales (*id.*, rows 29369, 32957), all of which are tasks benefiting a property.

3. Claims Administration v. Multi-Claimant Dispute Resolution Procedure

In advancing their objections, the objectors adopt an extremely narrow interpretation of what the Court meant by "the implementation and management of an orderly summary claim-priority adjudication process." Although they concede that the Receiver initiated the claims process "designed to identify who held claims against the estate and whether those claims were allegedly secured by a lien on one or more of the estate's properties" (Response, at 22), they inexplicably object to the allocation of tasks involving the "collection of information and documentation from the Lenders (lines 55-71), claim form communications with claimants (line 1313), review of claim forms (lines 2130-2132), and review of and analysis of rollover claims (line 2144)." (Response, at 14)

Apparently, they object to any of the Receiver's early work preparing for, designing, or implementing the claims process simply because the Receiver had not yet filed his formal motion for approval of the process until February 28, 2020. *Id.* As an initial matter, this notion ignores that the Court's Order did not draw the line they seek to apply. It also is plainly inconsistent with the District Court's intention and language, which covers the claims process generally, including designing, implementing, and managing the process. (*E.g.*, Dkt. 1030 at 2, 4 ("at the Court's direction, the Receiver also has worked with stakeholders—such as the SEC, the institutional

lenders, and certain individual lenders—to develop a summary claim-priority adjudication process designed to resolve the competing claims created by the Cohens") (citing Dkt. 941 (outlining procedures to adjudicate lien priorities))) Drawing a line in this fashion is also wooden, and ignores that one of the primary roles of a receiver is to design and implement a claims process for the claimants and the Court; and that, in this case, with its nuances, complexity, and pervasive oppositionalism, designing a claims process that met and balances the requirements and due process interests of the interested parties was no small feat.

The objectors' position ignores the substantial work that was needed *prior to* February 28, 2020 to design and implement a claims process including, without limitation, the initiation of the process leading to the Receiver's first filing in February 2019 (Dkt. 241), providing notice to interested parties, creating a unique and comprehensive Proof of Claim form, establishing a portal for claim submission, the receipt and initial handling of thousands of claims, responding each month to hundreds of inquiries from claimants and their counsel, and the extensive and detailed reporting on the claims (see also, e.g., Dkt. 241 (& Ex. 3), 280, 282, 285, 300, 302, 468, 477, 548, 624 (Ex. 5)). The February 2020 motion itself set forth a process that represented the culmination of discussions and efforts with the Court, counsel for the institutional lenders, and certain other claimants between October 2019 and February 2020 (Dkt. 638, 720; see also Dkt. 1030, at 4), and which then led to other significant time spent crafting and collaborating with respect to standard written discovery (Dkt. 799, 866, 884, 911, 917, 928, 953, and 972), working with Court-approved vendors Axos and Avalon to provide all claims and supporting documentation to all claimants (Dkt. 911, 928, 953, and 972), and working with Court-approved vendors CloudNine and TeamWerks, as well as lead claimants' counsel, to prepare the EquityBuild documents database (id.). The Court has already found that the "Receiver expended significant effort to set up the

streamlined process through which the validity and relative priority of each claim can be determined (such as negotiating with stakeholders to develop standard discovery requests). This was necessary to untangle the morass of competing claims created by the Cohens, *and the Institutional Lenders will reap the benefits of the process*." (Dkt. 1030, at 13-14 (emphasis added))

Additionally, hundreds of the entries for which a "Claims Administration" objection has been asserted have little or nothing to do with claims administration. For example, Exhibit B lodges this objection to entries that relate to responding to objections to the Receiver's various sales motions (*see*, *e.g.*, Ex. B, rows 121, 1114, 6699), negotiations and motion practice regarding credit bidding (*id.*, rows 796, 1065), moving to dismiss appeals filed by the objectors (*id.*, rows 1427, 1474, 1507), conferences with real estate brokers regarding property sales (Ex. B, rows 26081, 26590; Ex. C, rows 2165, 2171), real estate taxes (Ex. E, rows 975, 1045, 1369), insurance renewals and refunds (Ex B, rows 1179, 25865, 27555), code violations asserted against properties (*id.*, rows 2670, 26673), and financial reporting (*id.*, rows 629, 789, 18891; Ex. C, rows 126, 422). These are but a few examples of hundreds or thousands of unrelated entries to which the objectors have indiscriminately asserted this "claims administration" objection. (*See also* Exhibit 1, Rows 42-45)

4. Comingling of Rents and Rent Restoration

The objectors point to the gray entries on Exhibit C and argue that the Receiver should not be compensated pursuant to the Receiver's lien for any of these tasks because the work related to the restoration of rental income used to pay expenses of different properties. In fact, a large percentage of the approximately 234 hours that received this objection had nothing to do with

¹⁰ The objectors argue that over 160 hours relate to the rent restoration issue (Response, at 15), but gray entries on Exhibit C add up to 234 hours.

the Court's February 13, 2019 order (Dkt. 223), which related solely to the restoration of rents to certain of the properties.¹¹

For timekeeping purposes, the Receiver and his counsel have frequently used the term "restoration" as shorthand for the tracking and accounting of property-related expenditures such as property management costs, real estate taxes, and insurance costs. Rent restoration, *per se*, in accordance with the Court's 2/13/2019 Order, was only one subcategory of the overall financial reporting that the Receiver provided and for which the term "restoration" was used in reference to such financial accounting, reports, and reporting. The tasks at issue related, for example, to gathering information to ensure proper accounting for expenses relating to specific properties, tracking and reviewing property management records and accounting for accuracy and the proper allocation of expenses to properties, ensuring that no property bears more than its share of any such expenses, and ensuring that insurance premiums paid, refunded, credited, otherwise accounted for, are allocated to the correct properties.

⁻

¹¹ Exhibit B likewise contains similar objections on the basis of "improper rent commingling/ restoration" to 7,410 entries (807 unique entries constituting 868 hours on Exhibit B-1), and Exhibit D colors multiple entries gray which are objected to on the basis that they relate to rent restoration. The discussion herein relates equally to those objections.

¹² Property management costs included but were not limited to property management fees, unit turns, utilities (gas, electric, water), garbage service, tenant and rental services, various repairs (labor and supplies), janitorial services, landscaping services, extermination services, supervising building access to outside vendors (such as locksmiths, plumbers, electricians, glass repairmen, utility company inspectors, etc.), asset reconciliation and accounting services, posting notices, eviction-related services, and permits. (Dkt. 749-1, Duff Declaration, ¶ 9)

¹³ The objectors object to a number of tasks on the basis they occurred after sale of the properties. This ignores essential work needed to complete the sale, finalize accounting, and address various other post-sale issues that were property specific were required to accounted for on a property level. For example, work is needed to notify the insurer of the sale and obtain a pro-rata credit for insurance that has been prepaid. The Receiver is still working with the property managers to properly track and account for expenses and with the insurance broker to obtain and properly allocate policy premium refunds for sold properties.

And even those entries objected to on this basis – that do relate to the Receiver's response to the lenders' rent motion (Dkt. 90) and the construction and implementation of a system to account for the rents pursuant to the Court's rent restoration order (Dkt. 223) – at their core, involved issues associated with the management, repair, operations and safety of the properties pending their disposition and accounting for associated expenses. These activities were critical to all properties held in the receivership.

The Receiver's Second Restoration Motion (Dkt. 749), which was filed on July 24, 2020, involved both restoration to properties that had their rent proceeds used for the benefit of the other properties *and* the restoration of expenditures of Receivership funds to the Receiver's account. Indeed, of the \$1,587,866.14 to be restored, only \$391,830.42 (25%) was paid out of the rent proceeds of other properties. The other 75% was either advanced to the property managers or paid directly by the Receiver for the benefit of those specific properties, and thus the "restoration" was to the Receiver's account and not to other properties in the Estate. (Dkt. 749-1, Ex. 2) Such work was needed, among other reasons, to ensure that the over 100 properties in the Estate were properly charged for expenses that benefitted them. The Receiver's work in this regard is ongoing (*see* note 13, *supra*); but none of the work since the second restoration motion relates to restoring rents to properties even though the term "restoration" continues to be used with some regularity in the task narratives.

5. Credit Bidding

The objection raised about credit bidding allocations should be overruled without significant debate. As the Court will recall, the issues regarding credit bidding were part of the process regarding the sale of properties in Receivership estate. The briefing on such issues dealt largely with whether and how to implement such a process, given the competing priority claims, and then creating parameters for such bids. (Dkt. 232, 235, 240, 333, 359, 362, 363, 365, 376,

398, 404, 418, 455, 476) The Receiver's work was key to shaping the credit bid process and creating proper limitations and boundaries to maximize the sale prices of the properties, while also protecting the interests of all claimants with respect to the sales process. Through their credit bidding contentions, the objectors sought both to stop the entire sales process (Dkt. 447 at 4-5) and to expand their influence and control over the marketing and sales process including through credit bidding procedures (Dkt. 418, 430, 447), all of which was litigated before the Court. The Receiver's efforts in that regard aimed to streamline the sales process, given the extreme risks and costs of holding the properties, thus benefiting whomever is ultimately determined to have priority for the encumbered properties. Significantly, the credit bidding procedures that the Court ultimately approved and were implemented resulted from the *collaborative efforts* of the Receiver, his counsel, and counsel for certain institutional lenders. (See, e.g., Dkt. 415) This process (and the large amount of briefing and effort created by the same objectors) impacted the sale process for all of the properties, and could not be more related to the items that have been approved by the Court for compensation from the Receiver's lien. In any event, the Court has also expressly found that work included in such activity has benefitted the estate. (E.g., Dkt. 710 at 3 (approving fees from July-Dec. 2019); Dkt. 614 at 3 (regarding earlier period))

The facts fully support the Court's determination, as not one property in the estate was acquired through credit bidding procedures; in the two instances where a credit bid was made, it was subsequently withdrawn by the lender. These results demonstrate that the Receiver legitimately raised questions about what were severely loose credit bidding procedures advanced by the institutional lenders, because in all instances the properties sold for more than any institutional lender was willing to pay. Put differently, the Receiver's efforts directly contributed to and ensured that the most money that could be obtained in the marketplace by a willing

purchaser or credit bidder was obtained, which benefits whoever will realize those funds at the end of the day, including the institutional lender claimants. (*See also* **Exhibit 1**, Rows 46-48)

6. Tasks not Equally Divisible

The objectors argue that the Receiver did not identify the particular properties involved in certain tasks, but that is precisely what the fee allocation schedules do. The Receiver again addresses the specific examples offered by the objectors in **Exhibit 1** hereto (*see* Rows 49-61), which explains how the tasks have been properly allocated and why the objections should be overruled. Moreover, for the reasons stated above and elsewhere herein, the Receiver's allocations are the result of an earnest effort to accurately, fairly, and reasonably distribute fees among the properties at issue; and mathematical precision is not required. *Elliott*, 953 F.2d at 1578; Dkt. 1184.

There are numerous examples in the exhibits submitted with the Response that show how indiscriminately the objectors asserted this objection, including the following:

- 8/30/18 task (NM) described as "appear for court in City of Chicago housing matters and correspond with counsel for the City of Chicago regarding same (1.5)" was correctly divided between the two properties at issue (Ex. B, row 19243)
- 10/11/18 task (NM) described as "appear for housing court on seven cases (8100 S Essex, 7508 S Essex, 7237 S Bennett, 6751 S Merrill, 7933 S Essex, 8107 S Ellis, 7616 S Phillips) and correspond with city counsel regarding same and other EB matter up later this month (2.5)" was properly allocated to these seven properties (Ex. B, row 19317)
- 12/6/19 task (NM) described as "Correspond with property managers and the City regarding violations and revise spreadsheet to reflect same (.6)" which was properly allocated to the four properties that were subject of this correspondence (Ex. C, row 1845)
- 9/29/20 task (JRW) described as "exchange correspondence with A. Porter regarding all administrative and housing court proceedings against properties involved in 10th sales motion and related research regarding same (.9)" which was properly allocated to the fourteen properties involved in the 10th sales motion (Ex. C, row 2624)
- 12/13/18 task (AEP) described as "teleconference with title company representatives regarding preparation of title reports for properties in first marketing tranche (.8)" which was properly allocated to the six properties in the tranche (Ex. D, p. 36)

7. Title Examination Charges

The objectors do not dispute that title examination charges relate to various specific properties nor that such work falls within the two areas identified by the District Court. The objectors instead argue that the Receiver improperly allocated time expended on title examination work related to property sales to those properties because title insurance premium charges were already deducted from the gross sales proceeds. The objectors recognize, however, that the Receiver has indicated that he will deduct agency fees paid to one of the Receiver's counsel from the final allocations to the properties. (Dkt. 1107 n.4 & Ex. 4)

While it is true that the agency fees that pay for the title examination work are baked into the title insurance premium, it was absolutely critical, in this unique case, for Receiver's counsel to be intimately familiar with the title history and closely involved in the title examination work due to the sheer number of municipal judgments, potentially unauthorized EBF mortgage releases, liens, quitclaims from purchaser-investors back to EquityBuild, errors in sloppily-prepared EquityBuild deeds, and other assorted liens associated with EquityBuild's ownership. Accordingly, it was essential that Receiver's counsel fully understand the entire history of title in order to ensure that all potential encumbrances appeared on the title commitment and that all potentially interested parties were identified in the motion papers. In short, this was not a job for a title underwriter not familiar with EquityBuild's operations. Put another way, there were benefits from this work to the claimants, the properties, and the Estate that went beyond mere title examination. The Receiver's counsel's arrangement with the title company significantly reduced but did not entirely offset the fees for such work, and the difference (after the credit that the Receiver will apply, see Dkt. 1107 n.4 & Ex. 4) is properly allocated to the specific properties impacted, as reflected in the Receiver's allocations. (See also Exhibit 1, Rows 62-64)

8. Ambiguous Entries

The objectors argue that certain entries are completely lacking in detail, and offer as examples three entries that, standing alone, say only "call." (Response, Ex. C, Lines 2205, 2282, 2521; *see also* Dkt. 1210, n.13) The objectors are looking at these entries completely divorced from the plain context of surrounding entries and ignore that the proper allocation can be gleaned from the Receiver's specific allocation schedules and the original invoices. (*See supra* at 3-4, 10 (noting that (i) for more general task descriptions, for which no specific allocation had been made in the original description, the Receiver reviewed the tasks and added specific allocations and (ii) the subject matter of most such tasks can be determined by reference to other information in the invoices, fee applications, fee allocation spreadsheets, or elsewhere in the record); *see also* Dkt. 1182, at 11-12) And to the extent there is any confusion caused by the fact that the spreadsheets occasionally list the tasks of an entry out of order, the objectors are fully aware that each of the Receiver's and his counsel's invoices were attached to the quarterly fee applications and readily available. Once the entire entry is reviewed, the stand-alone task can be considered in context.¹⁴

The Receiver also takes issue with the objectors' argument that neither they nor the Court are able to identify the properties involved in a given time entry. In fact, the entries are allocated to the properties involved, with references clear from other time entries as well as ongoing activity during the time period. (*Id.*) Moreover, as described more fully in the Receiver's responses to the objectors' specific examples, the objectors' argument improperly disconnects the tasks as they were originally submitted from the allocation spreadsheets that reflect surrounding entries in order

¹⁴ The Receiver has previous noted that the original tasks purposefully match the exact time billing entries as they were originally submitted to the Court in the invoices with the fee applications so that any person wishing to locate a task and review it in context can find it exactly as it was prepared and submitted. (Dkt. 1182, at 9 n.4)

to properly allocate tasks, including especially those for which the original invoices did not provide a specific allocation. (*See* Exhibit 1, Rows 65-69)

And as with their other objections, a review of the objectors' exhibits reveals that many of the purportedly ambiguous entries are anything but ambiguous, for example:

- 2/29/19 task (KBD) described as "communications with K. Duff, N. Mirjanich and J. Rak regarding payment of 2018 delinquent property taxes for certain receivership properties and related issues (.3)" which was correctly allocated to 11 properties (Ex. C, row 601)
- 5/6/19 task (JR) described as "finalize the assignment and assumption of leases with corresponding attached leases for all 27 tenants (1.4)" which was correctly allocated 100% to the property at which the tenants resided (Ex. D, p. 89)

9. Claims Adjudication Litigation

The objectors argue that tasks relating to the claims priority adjudications, such as discovery, filing a framing report, and making recommendations to the Court must be excluded because the benefit to the to-be-determined first-priority secured creditor cannot be determined until the conclusion of the claims process. (Response, at 19, *citing* Dkt. 1030, at 14 n.7) The Receiver has allocated tasks of this nature to "Group 1," which have been divided equally among the five properties in Group 1. There is nothing preventing the Court from confirming at this time that such allocations are appropriately allocated to these five properties. Unquestionably, many of the tasks undertaken by the Receiver in connection with the Group 1 claims process have served to ensure a fair and orderly administration the process for the benefit of all claimants in the group, irrespective of result. (*See* Dkt. 1030, at 13 ("[b]y ... implementing the summary claim-priority adjudication process, the Receiver has conferred a similar benefit here, *regardless of which claimant is determined to be the first-priority secured lienholder at the end.*") (emphasis added)) This Court can make a recommendation to the District Court in that regard and doing so now would be consistent with efforts to achieve judicial economy in this action.

A review of the various exhibits submitted by the objectors shows that work against which this objection was asserted included entries having little or nothing to do with the claims priority adjudication. For example, Exhibit B includes entries related to state court litigation involving 3074 Cheltenham, which was specifically allocated to that property (*see*, *e.g.*, Ex. B, row 7001, 7005, 7049).

10. General Fee Allocation Deficiencies

The objectors include very few particulars for their objection to the Receiver's General Allocations (Dkt. 1107-9, Ex. 3) and but a single example, *i.e.*, "the inclusion of time associated with the process of collecting claims-related data, as distinct from the Receiver's efforts regarding the dispute resolution process that has been approved by the Court." (Response, at 20) This distinction is one without a difference given that collecting claims data was part of the development of the claims process and ran well into 2021 leading into the start of the Group 1 process.

Indeed, 2,630 of the 3,122 objections set forth on Exhibit E to the objectors' motion (84%) are on the grounds that the task is related to "the collection of claimant information and documentation, interaction with claimants, and general claims administration." As explained above in Section II.A.3, this work was essential to the design and implementation of a claims process, which the Court has already determined conferred a benefit on the properties, regardless of which claimant is determined to be the first-priority secured lienholder at the end. (Dkt. 1030 at 13) The remaining objections to the Receiver's general allocations set forth in Exhibit E are the same type of objections addressed elsewhere in this Reply—*i.e.*, that the entry is ambiguous (Section II.A.8), relates to general receivership operations (Section II.A.2), the task is not equally divisible (Section II.A.6), improper rent restoration (Section II.A.4), and single claim properties (Section II.C). Moreover, a comparison of the general allocations that were objected to and those

that were not shows there is frequently little rhyme or reason to the objections. (*See* Exhibit 2, General Objections that were not objected to)

The Receiver applied "general allocations" consistent with *Elliot* and specifically following the allocation methodology approved by the District Court in this case. (See Dkt. 824, at 5) Notably, the general allocations for fees that District Court has already approved represent less than 20% of all tasks in invoices for the Receiver and RDP through 9/30/2021; and they are segregated and consolidated into a single spreadsheet for ease of review. Moreover, the "general allocations" are not divided by counting heads, against which Elliott cautions; instead, the allocations are weighted according to the relative sale price of each property, which is a method proposed by the Receiver intentionally to comply with *Elliott* (Dkt. 638, at 23-25) and approved by the District Court (Dkt. 824, at 5) See also Lowder, 354 S.E.2d at 767 (it is fair and reasonable for the Court to use an allocation method based on the total value of the properties after liquidation as an indication of the amount of time and effort expended for the properties while in the receivership), cited with approval by Elliott, 953 F. 2d at 1578. Notably, the objectors have not offered any alternative method that would be a more equitable way to divide the burden of the receivership, a factor the Court has previously noted is meaningful in the context of fee review and allocation. (See Response, at 5; compare Dkt. 1184 (observing that these objectors "did not offer any other suggestions" in reference to "how to best tackle the Receiver's motion")).

11. The Inadequacy of the Receiver's Explanations

The objectors argue that the explanations contained in the Receiver's objection to their request for a fee examiner (which specifically responded to the examples *the objectors* chose to present to the Court) cannot be applied wholesale to all of the Receiver's time entry allocations. But this argument misses the point. The Receiver agrees that it is not a good use of the objectors', the Receiver's, or the Court's resources to address every one of the roughly 30,000 task entries on

the Receiver's schedules. The Court itself attempted to dissuade the objectors from such an approach. (Dkt. 1184) But the time that has been devoted to selecting and responding to specific examples decisively demonstrates that the Receiver made an "earnest effort to devise a method of allocating the actual costs of the receivership to specific assets," which is precisely what is required by *Elliott*, 953 F.2d at 1578. Moreover, the objectors' arguments show that regardless of what method the Receiver had chosen, they would have an objection. An example of this is their juxtaposed objections that the entries are both too compound, and too granular. (*See* Response, at 20 & n.13) For a further explanation of the Receiver's responses to their examples and representative arguments, see **Exhibit 1** (Rows 70-72), accompanying this reply.

B. Additional Objections Applicable to Single-Claim Properties

The challenges to the allocations to the Single Lien process should be overruled. Importantly, and on a threshold level, the objections raised do not claim error in the allocation whether in terms of the amount or to which property – but instead largely concentrate on contesting that a benefit was provided to the properties. However, as noted in the Receiver's motion, the District Court has already determined that fees relating to (a) the preservation, management and liquidation of the real estate belonging to the Receivership Estate, and (b) the implementation and management of an orderly summary claim-priority adjudication process, benefitted the encumbered properties and therefore should be paid pursuant to the Receiver's lien from the sales proceeds of those properties. (Dkt. 1030, at 12, 14)

With no credible argument to oppose the substantive allocation presented by the Receiver, the Single Lien objectors' focus on redefining the date at which a separate process was initiated for single claims properties. In doing so, they manufacture an argument that any allocation after January 2020 does not benefit the Single Lien properties because they were identified as not having a priority dispute in a status report issued at that time. That argument is baseless, but to better

understand its lack of merit, it is helpful to highlight a few background items which establish that the Single Lien process, which these objectors seek to divorce from the overall claims process, was largely developed within and as part of the claims process.

In February 2019, the Receiver originally recommended a process in which the Receiver would review all claims, conduct necessary discovery, and report to the Court as to the validity, amount, legality, and classification of all claims. (*E.g.*, Dkt. 241, at 4-5 & Ex. 3 at 3) With much debate on such matters continuing for months, the Court convened various discussions with the Receiver, the SEC, the institutional lenders, and certain investor lenders from October 2019 through February 2020 to discuss the parameters for a claims process to resolve *all* issues relating to all properties against which claims were asserted. The Court directed the Receiver to file a motion proposing a process consistent with those efforts and discussions, which the Receiver filed in February 2020. (Dkt. 638)

In subsequent hearings, the Court made it clear that the process being developed was to be the process where *all* aspects of *all* claims were going to be handled, including for Single Lien properties. For instance, the Court stated in March 2020 that even where there are no competing mortgages at issue for the properties (as the Single Lien claimants classify themselves), the claims process that was being developed would be used for those claims:

Though there are no competing mortgages for four of the properties at issue, ... the Court is persuaded that, with respect to these properties, other issues remain to be resolved during the initiated claims resolution process, including without limitation the alleged balance due in connection with the corresponding loan, the propriety of all of the component amounts of the claims asserted, and the entitlement of the Receiver to an administrative lien on a portion of the proceeds, if warranted.

(Dkt. 676, at 6 n.2 (internal citations omitted)) Further, on July 15, 2020, the Court stated during a hearing, that "all issues with regard to a property should be resolved during the claims process,

including any issues with regard to fraudulent transfer, inquiry notice. Whatever issues there are, I want it all resolved when the property is up for adjudication during this claims process." (7/15/2020 Tr., at 45:9-13) (emphasis added) Put differently, throughout the development of the claim process, including after January 30, 2020, the District Court made clear that the claims evaluation and resolution process would address more than whether there are competing liens and would expressly include the Single Lien properties.

Even when the District Court indicated for the first time, on January 29, <u>2021</u>, that a special process be further developed for the Single Lien properties (1/29/21 Tr. at 16:6-12), the Court also acknowledged that the process would be similar to and evolve from the work to develop the disputed claim process, but just more abbreviated: "I think that it makes sense to have a different, perhaps more abbreviated process for those properties where there aren't any completing claims. For those properties, I think the scope of discovery will be narrower. I think the issues will probably be narrower." (*Id.*, Tr. at 17: 6-11)

Subsequently, the Receiver and counsel for the Single Lien claimants worked collaboratively to discuss and develop that parallel process up until **November 18, 2021**, when the Court approved the Single Lien process for which implementation began shortly thereafter. (*See* Tr. 11/18/21 at 31:24-33:14; Dkt. 1073 (Joint Motion On Single Lien Claim Process); Dkt. 1099 (11/30/21 Order granting Motion to determine claims process for single claims properties)) The record is clear that there were extensive discussions and submissions as to what that Single Lien process would contain, and which were only resolved and approved in November 2021. This

record fully rebuts the objection based on both the suggestion of a January 30, 2020 cutoff date and the false notion that the Receiver's efforts provided no benefit to the Single Lien properties.¹⁵

A review of the exhibits setting forth the Single Lien claimants objections (Dkt. 1210, Exhibits F and G) confirm the baselessness of the objections. Exhibit F contains objections to 328 of the Receiver's specific allocations to the two U.S. Bank properties (7110 S Cornell and 6749-59 S Merrill) and one of the Midland properties (8529 S Rhodes), and states that the objections should be applied to all 28 sole lien properties. About a third (129) of these allocations are objected to on the basis that the multi-claim process was inapplicable to these properties after January 30, 2020, with a large percentage of these objected-to entries specifically relating to the Single Claim properties, for example:

• Row 7, 4/20/20 (KBD) "study correspondence from claimant's counsel regarding potential resolution of claims (7110-16 S. Cornell, 6751-57 S. Merrill) (.2)."

Merrill) (.2)."

Merrillo (.2)."

15 Furthermore, as previously noted to the Court, a "benefit" to a secured creditor is not the only

basis upon which the fees may be allocated to encumbered funds. It is also appropriate to allow payment of administrative expenses from the proceeds of secured collateral when the secured creditor caused the expense. In re Cascade Hydraulics & Utility Service, Inc., 815 F.2d 546, 548 (9th Cir. 1987) ("We allow payment of administrative expenses from the proceeds of secured collateral when incurred primarily for the benefit of the secured creditor or when the secured creditor caused or consented to the expense."); see also Matter of Trim-X, Inc., 695 F.2d 296, 301 (7th Cir. 1982) (finding expenses of trustee were "caused" by secured creditor in the sense that it failed to promptly respond to trustee's petition); First Western Savings and Loan Ass'n v. Anderson, 252 F.2d 544, 548 n.8 (9th Cir. 1958) (among the factors to be considered in determining whether reorganization expenses should be charged against mortgaged property is: "Were the secured creditors responsible for any delays in connection with the proceedings, or uncooperative in the attempt to formulate an acceptable plan?"); In re River Oaks Ltd. P'ship, 166 B.R. 94, 100 (E.D. Mich. 1994) (acknowledging expenses may be paid from secured collateral if secured creditor initiates frivolous or ill-founded legal actions that cause the expenses to be incurred, and remanding for specific determination as to whether creditor caused debtor to incur the allowed expenses). Here, the Single Lien claimants have been very active litigants and objectors including in regards to the claim process issues (see, e.g., Dkt. 440 and 785 (Motions for Turnover) and Dkt. 1073 (Joint Motion Regarding Single Lien Claims)) as well as in the claims process generally (Dkt. 708 (opposing Receiver's motion establishing claims process), Dkt. 807 (motion to resolve disputed discovery issues for claims process), Dkt. 812, Dkt. 814) and is a further basis for overruling their objection and approving the Receiver's allocations.

- Row 23, 6/5/20 (ED) "Conference call with K. Duff. M. Rachlis, A. Porter, and J. Wine regarding claims analysis for two properties (7110 S Cornell, 6751 S Merrill) (2.7)"
- Row 67, 7/1/20 (KBD) "telephone conference with lender counsel and M. Rachlis regarding potential resolution of claims (7110 Cornell, 6751 Merrill) (.5)"
- Row 95, 9/10/20 (MR) "attention to turnover motion (7110 Cornell, 6751 Merrill) (.3)"

The objection that work done specifically relating to the claims asserted against the Single Claim properties cannot be allocated to those properties because of the arbitrary January 2020 deadline is meritless for the reasons discussed earlier.

The other primary objection to 198 (60%) of the entries in Exhibit F is that the Single Claim process is related to the recovery of unsecured funds and is not for the benefit of the lienholder or the property. However, these entries specifically related to work performed relative to the Single Lien properties and claims at issue for their benefit, and are properly allocated to the properties for the reasons discussed above. Furthermore, and contrary to the objectors' statements, in fact 15 of the 28 Single Lien properties do have potentially adverse liens and/or issues regarding invalid releases, which was the subject of negotiations related to the Single Claim Process, further undermining their objections. (Dkt. 1073 at 2 n.1)

The objections set forth in Exhibit G, which relates to the Receiver's general allocations, are of the same nature. All but one of these roughly 3,500 objections are to entries relating to work done on the implementation and management of a claims process after January 30, 2020, which is invalid for the reasons already discussed. The single objection on the grounds that the entry relates to the single claims process that did not benefit the lienholders appears to be an erroneous general

allocation which should have been specifically allocated to the Single Claim properties identified. (Ex. G, row 2688)

Finally, the Single Lien claim objectors claim that the work and process here involve an adversary procedure yielding a direct conflict with the Receiver, and as such, of no benefit to the Single Lien claimants. However, there has not been a one-on-one conflict between the Receiver and the Single Lien claimant – the work done and performed to date has been to establish a review process, and then utilize that process to review the claims for those properties. As the Single Lien claimants are well aware, based on the schedule set by the Court for the Single Lien claims process, the date by which the Receiver would *first* oppose their claims, if at all, is **April 29, 2022**. (Dkt. 1090) That is not an adversary process (although, as noted, more than half of the properties actually have lien related issues). Instead, what is transpiring here is that these Single Lien claimants have received the benefits of the claims process that has been established specifically for them and at their request, and they properly should share in the administrative expense. *Elliott*, 953 F.2d at 1577-78. As the court notes in *Elliott*, "a benefit to a secured party may take more subtle forms than a bare increase in monetary value. Even though a receiver may not have increased, or prevented a decrease in, the value of the collateral, if a receiver reasonably and diligently discharges his duties, he is entitled to compensation." Elliott, 953 F.2d at 1577 (citing Donovan v. Robbins, 588 F. Supp. 1268, 1273 (N.D. Ill. 1984) (the district court awarded the receiver a fee simply for determining how much money to release to a creditor)).

C. The FHFA Objections Should Be Overruled.

The Federal Housing Financing Authority ("FHFA") argues that it is acting as a conservator for Freddie Mac and Fannie Mae in regards to two properties – 1131 E 79th and 7024 Paxton – and that the allocation of certain fees and costs "would [] restrain and affect the Conservator's statutory power to 'collect all obligations and money due' the Enterprises, and to

'preserve and conserve [their] assets and property," see 12 U.S.C. § 4617(b)(2)(B)(ii-iv) & 4617(f). There are several reasons to reject the arguments advanced by the FHFA.

As an initial matter, the issue of priority remains unresolved on the two properties at issue. If the investor-lenders on those properties are found to have priority, the issue of the alleged application of Section 4617 is irrelevant. Put differently, the issue raised by FHFA is premature and may prove to be moot.

Second, the statute and authority FHFA advances are inapplicable. The FHFA admits that its role here is as a conservator, not receiver. (Dkt. 1209 at 1) The law, including many of the cases discussed by the FHFA, recognize the difference between a conservator and a receiver. For example, in the recent Supreme Court opinion in *Collins v. Yellen*, 141 S. Ct. 1761, 1771 (2021) (Dkt. 1209 at 9-10), in accepting arguments advanced by FHFA as it advances here relative to activities as a conservator, the Court emphasized that the "evidence does not suggest that the companies were in the process of winding down their affairs." In *Perry Capital LLC v. Mnuchin*, 864 F.3d 591, 638-39 (D.C. Cir. 2017), also cited at various points by FHFA (*e.g.*, Dkt. 1209 at 5), the dissent emphasized the different roles between conservator and receiver:

But if a power is enumerated as that of a "receiver" (or fairly read to be a "receiver" power), FHFA cannot exercise that power while calling itself a "conservator." The statute confirms as much: the Agency "as conservator or receiver" may "exercise all powers and authorities specifically granted to conservators or receivers, respectively, under [Section 4617], and such incidental powers as shall be necessary to carry out such powers." *Id.* § 4617(J)(i) (emphasis added).

A conservator endeavors to "put the regulated entity in a sound and solvent condition" by "reorganizing [and] rehabilitating" it, and a receiver takes steps towards "liquidat[ing]" the regulated entity by "winding up [its] affairs." 12 U.S.C. § 4617(a)(2), (b)(2)(D)-(E). In short, FHFA may choose whether it intends to serve as a conservator or receiver; once the choice is made, however, its "hard operational calls" consistent with its "managerial judgment" are statutorily confined to acts within its chosen role. *See* Op. 607. There is no such thing as a hybrid conservator-receiver capable of governing the Companies in any manner it chooses up to the very moment of liquidation. *See* Op. 624 (noting HERA "terminates [shareholders]

rights and claims" in receivership and acknowledging shareholders' direct claims against and rights in the Companies survive during conservatorship).

Perry Capital, 864 F.3d at 638-39.

What these authorities and others recognize – as does Section 4617 – is that there is a meaningful and determinative distinction between conservators and receivers. Conservator tasks relate to operating a business as a going concern. That is not what was or is transpiring in the matter at bar, as the properties were being liquidated – the activities of a receiver. As such, FHFA's positions here represent actions beyond those of a conservator's powers and unsupported by the statute and which the court has the jurisdiction to and should reject as it proceeds to review the allocations. *See*, *e.g.*, *Cty. of Sonoma v. FHFA*, 710 F.3d 987, 992-93 (9th Cir. 2013). "[I]f the FHFA were to act beyond statutory or constitutional bounds in a manner that adversely impacted the rights of others, § 4617(f) would not bar judicial oversight or review of its actions." *Cty. of Leon v. FHFA*, 700 F.3d 1273, 1278 (11th Cir. 2012) (citation omitted).

Third, and regardless, any such argument by FHFA should be deemed waived, or the Receiver's actions otherwise ratified. *Cf., Ester v. Principi*, 250 F.3d 1068, 1071-72) (7th Cir. 2001) (holding "we conclude that when a [federal] agency decides the merits of a complaint, without addressing the question of timeliness, it has waived a timeliness defense in a subsequent lawsuit," and further noting that "[t]he requirement that a federal employee exhaust available administrative remedies in a timely fashion is subject to the doctrines of waiver, estoppel and equitable tolling") (citations omitted). Almost from the inception of this Receivership, both Fannie Mae and Freddie Mac entered appearances in this matter. (*See* Dkt. 35, 61) (appearances on behalf of both Fannie Mae and Freddie Mac) So, not later than October 2018, Fannie Mae and Freddie Mac (and consequently FHFA) had notice of the Receivership and the plans regarding the disposition of properties in the Receivership in an orderly fashion. At no time until a few weeks

ago was any issue raised regarding FHFA's claim of interference with its statutory duties and functions, but all the while limited Receivership resources and monies were used to maintain the properties until sold, pay for insurance, address taxes, and the like, and ultimately work towards the marketing and disposition of the properties, all of which involved time spent by Receiver and his professionals relative to the disposition of such properties. FHFA did not take any step or raise any argument until now.

Under these circumstances, it is fair and proper to conclude that a conscious decision was made by FHFA as a conservator under the statutes which provide that it "may [not shall], as conservator, take such action as may be—appropriate to carry on the business of the regulated entity and preserve and conserve the assets and property of the regulated entity." 12 U.S.C. §4617(b)(2)(D)(ii). There can be no doubt or dispute that FHFA knew, and was at all times throughout this receivership well aware, of all statutory rights and remedies available to it. Fannie Mae and Freddie Mac's counsel (and therefore FHFA) were well aware of all of the arrows in their quiver, but the fact that they flooded the docket with countless objections without having previously raised Section 4617 for over three years can reasonably be construed by this Court as a knowing and express determination to not do so. Indeed, FHFA does not, and cannot argue, that any action of the Receiver restrained or effective its activities. Moreover, rather than "restrain and affect the Conservator's statutory power to 'collect all obligations and money due' the Enterprises" the Receiver's efforts have benefitted the properties, as the Court itself has repeatedly observed. (See, e.g., Dkt. 1030 at 4 (citing Dkt. 541, 614, 710, 824)) Having failed to raise such issues and watched this expenditure of resources and funds, the FHFA should be found to have consented to and/or ratified the fees and costs associated with the performance of activities which benefitted the properties, and/or otherwise waived the objection it raises now.

Finally, the numerous cases advanced by FHFA are simply inapplicable to the matter at bar. None of these cases involve a situation similar to the facts of this case, nor do they support the position of the FHFA. Many of the cases cited by FHFA involve shareholder or investor actions being brought directly against FHFA for an injunction or breach of fiduciary duty, which were largely dismissed, and none of them is remotely analogous. See, e.g., Roberts. v. FHFA, 889 F.3d 397 (7th Cir. 2018) (affirming dismissal of shareholder suit); Robinson v. FHFA, 876 F.3d 220 (6th Cir. 2017) (affirming dismissal of investor claim); Jacobs v. FHFA, 908 F.3d 884 (3d Cir. 2018) (shareholder action against FHFA); Perry Capital, 864 F.3d at 638-39 (shareholder suit against FHFA dismissed). Other cases focused on challenges to have FHFA entities pay certain taxes associated with the transfers of real estate. See, e.g., Montgomery County Comm'n v. FHFA, 776 F.3d 1247 (11th Cir. 2105) (affirming decision that transfer taxes were exempt as to FHFA); Irving Independent School District v. Packard Properties, 970 F.2d 58 (5th Cir. 1992) (issues regarding ad volerem taxes). And other cases cited involve foreclosures which again is neither factually nor legally applicable. See, e.g., Berezovsky v. Moniz, 869 F.3d 923 (9th Cir. 2017) (addressing foreclosures by homeowners association).¹⁶

¹⁶ Other cases offered are similarly inapposite. For example, *Bender v. CentTrust Mtg. Corp.*, 833 F. Supp. 1540 (S.D. Fla. 1992) has no factual bearing on the matter at bar, but instead involved an independent suit brought by the former president of a failed bank's mortgage subsidiary which was controlled by the Resolution Trust Corporation ("RTC") seeking to enjoin the RTC from dissipating the assets of the subsidiary. The district court refused to enter the injunction and interfere with the FDIC's efforts to sell those assets, a situation that is wholly distinct from the matter at bar. Similarly, *Bhatti v. FHFA*, 15 F.4th 848 (8th Cir. 2021) is inapplicable. In that case, the appellate court rejected shareholders constitutional claim that certain actions violated the separation of powers through a non-delegation of authority; FHFA's citation to that decision is wholly out of context and inapplicable

CONCLUSION

WHEREFORE, the Receiver respectfully requests that his motion for allocation be granted and the objections of the certain objectors overruled, and to the extent any objection is sustained, that the Receiver be given leave to address and reallocate such fees as appropriate and consistent with this Court's rulings.

Dated: April 1, 2022 Respectfully submitted,

s/ Michael Rachlis

Michael Rachlis
Jodi Rosen Wine
Rachlis Duff & Peel, LLC
542 South Dearborn Street, Suite 900
Chicago, IL 60605
Phone (312) 733-3950
mrachlis@rdaplaw.net
jwine@rdaplaw.net

Attorneys for Kevin B. Duff, Receiver

CERTIFICATE OF SERVICE

I hereby certify that I provided service of the foregoing Receiver's Reply in Support of Fee Allocation Motion, through the Court's CM/ECF system, to all counsel of record on April 1, 2022.

I further certify that I caused true and correct copy of the foregoing Reply to be served upon all individuals or entities that submitted a proof of claim in this action (sent to the e-mail address each claimant provided on the claim form) and their counsel.

I further certify that the Reply will be posted to the Receivership webpage at: http://rdaplaw.net/receivership-for-equitybuild

/s/ Michael Rachlis

Michael Rachlis Rachlis Duff & Peel, LLC 542 South Dearborn Street, Suite 900 Chicago, IL 60605 Phone (312) 733-3950 Fax (312) 733-3952 mrachlis@rdaplaw.net

Exhibit 1

							EXHIBIT 1 - REC	EIVER'S RESPONSES TO OBJEC	TORS' FEE ALLOCATION EXAMPLES
Row #	Response Page	Objectors' Exhibit	Line/Page Reference	Date	Billing Category	Time Keeper	Task Narrative(s)	Objection	Receiver's Response
3	10	С	224	10/18/2018	Claims	KBD	management firm representative regarding debt service analysis (.3)	task entries that include settlement of an insurance claim, fire damage, or removal of judgment liens involving one or more buildings should not have been allocated equally among larger groups of properties	The objection should be overruled. Line 224 in Exhibit C does not seem related to their narrative objection (i.e., "task entries that include settlement of an insurance claim, fire damage, or removal of judgment liens"); so it appears they have cited that line number in error. That having been said, with respect to insurance claims, the Receiver worked to oppose any litigation that threatened the assets that the Receiver is holding. When those efforts related to a particular property, the Receiver allocated the associated tasks to that property. To the extent they are suggesting the allocation for Line 224 is incorrect, this too is wrong because on its face the task describes debt service analysis and the allocation was to all properties that had institutional debt on them. Either way, this allocation approach is consistent with Elliott. See 953 F.2d at 1577.
4	10	С	1840	12/16/2019	AD	AEP	of closings, status of remediation of fire- damaged properties and	task entries that include settlement of an insurance claim, fire damage, or removal of judgment liens involving one or more buildings should not have been allocated equally among larger groups of properties	The objection should be overruled. The objectors complain about a task that references "fire damage" being allocated to more than one property but they ignore that the task entry expressly states that the work related to the "status of remediation of fire-damaged properties and effect on current offers, and timing of future motions to approve sales (.2)." On its face, it related to "future motions to approve sales" and the allocation, properly, was allocated to all properties that had not already sold as of the date of the entry (12/16/2019).
5	10	С	2355	6/6/2020	AD	AEP	litigation matters, judgment amounts,	task entries that include settlement of an insurance claim, fire damage, or removal of judgment liens involving one or more buildings should not have been allocated equally among larger groups of properties	The objection should be overruled. Line 2355 in Exhibit C does not seem related to their narrative objection; so it appears they have cited this line number in error. That having been said, Lines 2356-58 of their Exhibit C relate to work undertaken to assemble information relating to various court proceedings involving many of the properties. This work benefitted the properties not only by ensuring the Receiver and his counsel were aware of all such actions and their status but also to allow tracking and resolution of those actions, including both unsold and occasionally sold properties, to use and provide such information in connection with the marketing, sale, and efforts to seek approval of the sales of properties, facilitate closings, address related matters with the City, communicate with the property managers, and have the benefit of such work in connection with the claims process. In these ways, the allocation was properly to only the 79 properties that were the subject of the work. (See also, infra, Receiver's response to same line objection in Objectors' Response, p.16)
6	10	С	2356	6/6/2020	AD	АЕР		task entries that include settlement of an insurance claim, fire damage, or removal of judgment liens involving one or more buildings should not have been allocated equally among larger groups of properties	Same as above.
7	10	С	2357	6/6/2020	AD	AEP	any receivership properties between 2018	task entries that include settlement of an insurance claim, fire damage, or removal of judgment liens involving one or more buildings should not have been allocated equally among larger groups of properties	Same as above.

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 41 of 157 PageID #:65074

Row #	Response Page	Objectors' Exhibit	Line/Page Reference	Date	Billing Category	Time Keeper	Task Narrative(s)	Objection	Receiver's Response
8	10	С	2358	6/6/2020	AD	AEP	receivership properties for title indemnities and holdbacks relating to recorded judgments and	task entries that include settlement of an insurance claim, fire damage, or removal of judgment liens involving one or more buildings should not have been allocated equally among larger groups of properties	The objection should be overruled. It is unclear that this objection relates to line 2358 of their Exhibit C. On its face, the task description relates to certain "closed sales of receivership properties" and the allocation, properly, was allocated to only the 17 sold properties that were the subject of the work.
9	10	С	2047	3/4/2020	AD	KBD	approve sale of Naples	property in Naples, Florida should not have been allocated to an Illinois property	The Receiver agrees that any task solely related to the Naples, Florida property should not be allocated to any of the properties that are the subject of the fee allocation motion. The Receiver excluded or deferred from the allocations at least 324 other tasks relating to the Naples property. The task shown on Ex. C, Line 2047, is an error and there should be no allocation to the properties for this task.
10	10	С	2476	7/10/2020	ВО		property manager for utilities at various	on Bennett and Avers Streets should not have been allocated to a Michigan Avenue property	The objection should be overruled. The Receiver disagrees that Line 2476 is an error. The objection ignores the full text of the task description, which included not only work relating to 7237 Bennett and 638 N Avers, but also work relating to the payment of installment on insurance premium financing agreement, and related communications with K. Duff and bank representatives, which was properly allocated to all properties that had not yet been sold as of the date of the work.
11	10	С	2176	4/9/2020	AD	JR	series x and update	tranches should not have been allocated to a property that only is a part of one of	The Receiver agrees that the allocations for this task is incorrect, and should be allocated as follows: 6437 Kenwood; 11117 Longwood

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 42 of 157 PageID #:65075

Row#	Response Page	Objectors' Exhibit	Line/Page Reference	Date	Billing Category	Time Keeper	Task Narrative(s)	Objection	Receiver's Response
12	10	С	2179	4/10/2020	AD	JR	correspondence with real estate broker regarding status of purchase and sale agreements for	time related to three different property sales tranches should not have been allocated to a property that only is a part of one of those groups	The Receiver agrees that the allocations for this task is incorrect, and should be allocated as follows: 7300 Lawrence; 7760 Coles; 8000 Justine; 8107 Ellis Avenue; 8209 Ellis; 8214 Ingleside
13	10	С	2351	6/4/2020	AD	JR	diligence documents for various properties in series 7 and series x,	time related to three different property sales tranches should not have been allocated to a property that only is a part of one of those groups	The Receiver agrees that the allocations for this task is incorrect, and should be allocated as follows: 5450 Indiana; 7760 Coles; 8000 Justine; 8214 Ingleside Avenue; 8107 Ellis; 8209 Ellis; 7300 Lawrence; 6437 Kenwood; 11117 Longwood
14	10	D	122	9/26/2019	во	NM	• • •	the Phillips property has nothing to do with Drexel	The objection should be overruled. The allocation is correct. While the Receiver has generally attempted to avoid including former properties in the allocations, when they are referenced in the task entries the Receiver has taken steps to avoid allocating any work related to the former property to the other properties. The objection ignores that the court appearance described in the task related to multiple cases and multiple properties. The allocation was made to 14 properties, including one former property, 7616 Phillips. None of the other properties received an allocation for the share of the time allocated to the former property.
15	11	D	122	9/26/2019	Claims	JR	review title commitments for the second and third tranche and draft additional creditors claim list (2.8)	Drexel was in the 1st tranche, not the 2nd or 3rd tranches	There is no entry on 9/26/19 matching the description of the objection. It appears this may be a reference to a task matching this task narrative on 9/4/19. Assuming this is what they meant, the Receiver agrees that the task was incorrectly allocated to the first and second sales tranches instead of the second and third sales tranches. Accordingly, the Receiver will re-allocate this entry to the following nine properties in the second and third sales tranches: 2909-19 E 78th Street; 3030-32 E 79th Street; 5955 S Sacramento Avenue; 6001-05 S Sacramento Avenue; 701-13 S 5th Avenue; 7026-42 S Cornell Avenue; 7301-09 S Stewart Avenue; 7834-44 S Ellis Avenue; 8047-55 S Manistee Avenue.

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 43 of 157 PageID #:65076

Row #	Response Page	Objectors' Exhibit	Line/Page Reference	Date	Billing Category	Time Keeper	Task Narrative(s)	Objection	Receiver's Response
16	11	D	64	3/18/2019	AD	AEP		This entry specifically references the wrong property and that the remaining portion of the entry generally references tranche 1 properties.	The objection should be overruled. The objection (which fails to include the entire task narrative) ignores the plain language of the task description. On its face it relates to, and references in two places (including language omitted by the objectors) the "first sales tranche," which included 5001 Drexel. The time entry also included specific reference to a particular property (7927 Essex), to which a portion of the fee was allocated. So the entry does not reference a "wrong property," nor is it exclusive to the specific property referenced, nor is the allocation invalid or incorrect.
17	11	D	64	3/20/2019	AD	AEP	Teleconference with K. Duff reading need for FEIN's of properties in first sales tranche, fire at property in first sales tranche (7943 Essex), and status of review of draft motion to approve sale of single-family homes (.3)	the wrong property (Essex) is referenced and that Drexel is not a single family home	The objection should be overruled because the reason provided is misplaced. The objection ignores the plain language of the task description. On its face it relates to the "first sales tranche," which included 5001 Drexel. The allocation also included specific reference to another property (7943 Essex), to which a portion of the fee was allocated, but neither does this make the reference to a "wrong property" nor does it make the allocation invalid or incorrect. The Receiver further notes that this is a .3 hour telephone conference and less than .1 was allocated to the Drexel property.
18	11	D	72	3/21/2019	Claims	MR	accounting and issues at	Drexel is not a cross- collateralized property, and this relates to an entirely different lender's property	The objection should be overruled. The objection ignores the reference to "accounting" in the task description. This task was broader than the reference to "cross collateralized properties." This particular entry was from M. Rachlis. The appropriateness of the allocation for this task is confirmed by the allocation for the entry of E. Duff on the same date, the same length of time, the same timekeepers involved, and with a similar task description ("confer with K. Duff and M. Rachlis regarding accounting for properties (.2)").
19	11	D	79	4/23/2019	AD	AEP	review, analyze and update closing checklists for same two unencumbered properties in first sales tranche and communicate with prospective purchaser regarding potential scheduling of closing (.5)	Drexel was in the 1st tranche, it was not an unencumbered property	The Receiver agrees this allocation is incorrect. It appears this allocation was based on the reference to "first sales tranche" in the task description, but the other language in the task description shows it should only have been to two of the unencumbered properties. The Receiver will revise its allocation of this task to 7549-59 S Essex Avenue and 7500-06 S Eggleston Avenue.

Row#	Response Page	Objectors' Exhibit	Line/Page Reference	Date	Billing Category	Time Keeper	Task Narrative(s)	Objection	Receiver's Response
20	11	D	87-88, 97, 99, 101, 105- 106	various	various	various		on May 22, 2019 yet these entries are on days after the property had already been sold	Simply because there was a reference to insurance after the sale does not mean that an allocation is incorrect. For example, there are many instances when the Receiver undertook efforts to recover premium refunds for properties following their sale. However, for task descriptions that relate to renewal of insurance, the Receiver agrees that allocations generally should not be made to properties once they have been sold and, in particular, the Receiver agrees that allocations for insurance renewal or payment after the sale of the property (on 5/22/2019) should not be allocated to 5001 Drexel. The tasks identified in this regard on Ex. D occurred within days of the sale of 5001 Drexel but because the sale occurred earlier, the allocations should be corrected.
21	11	D	99	6/4/2019	AD	AEP	prepare final revisions to proposed bid procedures (.7)	procedures occurs after the closing of 5001 Drexel on May 22, 2019, so it cannot relate to this property.	The Receiver agrees this allocation is incorrect. The task description shows it should only have been allocated to properties unsold as of the date of the task. The Receiver will re-allocate this task to the following properties: 7301-09 S Stewart Avenue; 7834-44 S Ellis Avenue; 5955 S Sacramento Avenue; 6001-05 S Sacramento Avenue; 7026-42 S Cornell Avenue; 3030-32 E 79th Street; 2909-19 E 78th Street; 7750-58 S Muskegon Avenue; 7748-52 S Essex Avenue; 7625-33 S East End Avenue; 7635-43 S East End Avenue; 8047-55 S Manistee Avenue; 701-13 S 5th Avenue; 7749-59 S Vates Boulevard; 6749-59 S Merrill Avenue; 7450 S Luella Avenue; 8342-50 S Ellis Avenue; 8201 S Kingston Avenue; 4520-26 S Drexel Boulevard; 8326-32 S Ellis Avenue; 8334-40 S Ellis Avenue; 8342-50 S Ellis Avenue; 8352-58 S Ellis Avenue; 5450-52 S Indiana Avenue; 6437-41 S Kenwood Avenue; 7760 S Coles Avenue; 8000-02 S Justine Street; 8107-09 S Ellis Avenue; 8214-16 S Ingleside Avenue; 8209 S Ellis Avenue; 11117-11119 S Longwood Drive; 7300-04 S St Lawrence Avenue; 710 S Cornell Avenue; 8214-16 S Ingleside Avenue; 8209 S Ellis Avenue; 3074 E Cheltenham Place; 2736-44 W 64th Street; 6356 S California Avenue; 6555-59 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; 7508 S Essex Avenue; 431 E 42nd Place; 7701-03 S Essex Avenue; 7442-54 S Calumet Avenue; 816-22 E Marquette Road; 6949-59 S Merrill Avenue; 4533-47 S Calumet Avenue; 4315-19 S Michigan Avenue; 7600-10 S Kingston Avenue; 7860-22 E Marquette Road; 6949-59 S Merrill Avenue; 4535-47 S Calumet Avenue; 470-52 S Indiana Avenue; 700-10 S Kingston Avenue; 7840-42 S Yates Avenue; 2800-06 E 81st Street; 4611-17 S Drexel Boulevard; 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; 8030 S Marquette Avenue; 8104 S Kingston Avenue; 8403 S Aberdeen Street; 8405 S Marquette Avenue; 8733 S Hodes Avenue; 8
22	11	D	100	6/17/2019	AD		exchange correspondence with property manager regarding rent roll for second/third tranche of properties (.2)	5001 Drexel was in the 1st tranche	The Receiver agrees this allocation is incorrect. The task description shows it should only have been allocated to properties in the second and third tranches. The Receiver will revise its allocation of this task to 2909-19 E 78th Street; 3030-32 E 79th Street; 5955 S Sacramento Avenue; 6001-05 S Sacramento Avenue; 701-13 S 5th Avenue; 7026-42 S Cornell Avenue; 7301-09 S Stewart Avenue; 7834-44 S Ellis Avenue; 8047-55 S Manistee Avenue
23	11	D To	100	6/19/2019	AD		Attention to issues on purchase and sale agreement issues regarding upcoming sales (.8)	was entered on 6/19/19 and Drexel was sold on May 22,	The Receiver agrees this allocation and others referencing "upcoming sales" are incorrect. The task description shows it should only have been allocated to other properties. The Receiver will revise its allocation of this task entry to 2909 E 78th; 4520 Drexel; 6749 Merrill; 7110 Cornell; 638 Avers; 701 S 5th; 7625 East End; 7635 East End; 7750 Muskegon: 7600 Kingston; 7748 Essex; 8326 Ellis; 3030 E 79th Street; 7301 Stewart; 8047 Manistee; 5955 Sacramento; 6001 Sacramento; 7237 Bennett; 7834 Ellis; 7026 Cornell; 6949 Merrill; 7450 Luella; 7656 Kingston; 7109 Calumet; 7546 Saginaw; 7749 Yates; 8201 Kingston

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 45 of 157 PageID #:65078

Row#	Response Page	Objectors' Exhibit	Line/Page Reference	Date	Billing Category	Time Keeper	Task Narrative(s)	Objection	Receiver's Response
24	12	D	101	6/19/2019	ВО	NM	revise spreadsheet to reflect same and correspond with property manager regarding same and regarding other violations (8107 S. Ellis, 7760 S. Coles, 7300 Saint Lawrence), and other building cases (.9)	not 5001 Drexel	The objection should be overruled. The date referenced by the objectors is incorrect, and it appears this relates to a 6/4/19 entry. The complete entry (which was submitted with the Receiver's fee petition for the second quarter of 2019) was "Appear for administrative court on buildings (8209 S Ellis) and streets and sanitation (5001 S Drexel) matters and move to lift default judgment on properties (5001 S Drexel) and obtain previously filed motions (2.3); revise spreadsheet to reflect same and correspond with property manager regarding same and regarding other violations (8107 S Ellis, 7760 S Coles, 7300 Saint Lawrence), and other buildings cases (.9)" Thus, the task does relate to 5001 Drexel and this allocation is correct. Also, the specific reference to other properties does not mean the task only relates to them, and a portion of the fee was allocated to these properties.
25	12	D	106	6/19/2010	во	KBD	study draft correspondence to lenders counsel regarding property status issues (.2)		The objection should be overruled. The date and page referenced by the objectors are incorrect, but it appears this relates to a task on 7/22/19. The Receiver disagrees that the allocation is not proper and disagrees that the fact that the property was previously sold makes the task unrelated to 5001 Drexel. The task in question related to the Receiver's review of draft communications with counsel for the institutional lenders relating to financial and status reporting with respect to the properties against which the institutional lenders had asserted claims, including 5001 Drexel.
26	12	D	109	7/1/2019	AD	JR	confer with brokers, M. Rachlis, A. Porter and K. Duff relating to sale of the second and third tranche (1.5)	5001 Drexel was sold in the 1st tranche.	The Receiver agrees this allocation is incorrect. The task description shows it should have been allocated to properties in the second and third tranches, whereas it appears to have been erroneously allocated to the first and second sales tranches. The Receiver will re-allocate this task to 2909-19 E 78th Street; 3030-32 E 79th Street; 5955 S Sacramento Avenue; 6001-05 S Sacramento Avenue; 701-13 S 5th Avenue; 7026-42 S Cornell Avenue; 7301-09 S Stewart Avenue; 7834-44 S Ellis Avenue; 8047-55 S Manistee Avenue
27	12	O	2184	4/15/2020	AD	JR	properties and update	impermissible across-the- board allocation and lumping of time referencing "various properties"	The objection should be overruled. The objection ignores that the Receiver has allocated this task to 36 specific properties, with each property receiving only a fraction of the smallest incremental time amount (i.e., less that 0.1 hours).
28	12	С	2186	4/16/2020	AD	JR	title company related to	impermissible across-the- board allocation and lumping of time referencing "various properties"	Same as above.
29	12	c	2187	4/16/2020	AD	JR	property manager and	impermissible across-the- board allocation and lumping of time referencing "various properties"	Same as above.
30	12	С	2188	4/17/2020	AD	JR		impermissible across-the- board allocation and lumping of time referencing "various properties"	The objection should be overruled. The objection ignores that the Receiver has allocated this task to 36 specific properties, with each property receiving only a fraction of the smallest incremental time amount (i.e., less that 0.1 hours). The allocation for this task also correctly and properly matches the immediately preceding task ("review email from the title company regarding third party authorization forms for buyer and exchange further correspondence with the title company (.2)") which is not reflected on the objectors' Exhibit C, but which appears on the original invoice.

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 46 of 157 PageID #:65079

Row #	Response Page	Objectors' Exhibit	Line/Page Reference	Date	Billing Category	Time Keeper	Task Narrative(s)	Objection	Receiver's Response
31	12	С	2192	4/20/2020	AD	JR	review due diligence documents received from property manager for various properties (1.3)	impermissible across-the- board allocation and lumping of time referencing "various properties"	The Receiver agrees this allocation is incorrect. Further investigation into the documents received from the property manager shows that the task should be re-allocated to the following properties: 1700 Juneway; 8209 Ellis; 8214 Ingleside; 7300 Lawrence; 8000 Justine; 8107 Ellis; 8209 Ellis.
32	12	C	2193	4/20/2020	AD	JR	conference call with K. Duff, M. Rachlis, A. Porter and real estate brokers related to current properties under contract and related matters and issues with closings (1.0)	impermissible across-the- board allocation and lumping of time referencing "various properties"	The objection should be overruled. The objection ignores that the Receiver has allocated this task to 45 specific properties under contract, with each property receiving only a fraction of the smallest incremental time amount (i.e., less that 0.1 hours).
33	12	С	1972	2/20/2020	AD	KBD	purchaser (.1)	refers to a potential purchaser(s) or an offer to purchase properties without identifying the property or properties involved	The objection should be overruled. For instances where there was a communication with a "potential purchaser," and the allocation was to all remaining properties in the Estate as the task description (as was the case with each of the objectors' examples here), that is because the potential purchaser was inquiring about purchasing any or all remaining properties in the Estate and not a particular property as the objection wrongly presumes. For these reasons, the allocation to all remaining properties is accurate.
34	12	С	1975	2/24/2020	AD	KBD	estate broker regarding potential purchaser (.1)	refers to a potential purchaser(s) or an offer to purchase properties without identifying the property or properties involved	Same as above.
35	12	С	2048	3/9/2020	AD	KBD	potential purchaser	refers to a potential purchaser(s) or an offer to purchase properties without identifying the property or properties involved	Same as above.
36	12	D	127	11/15/2019	AD	KBD	and sale proceeds (.1)	reference 2nd and 3rd	The objection should be overruled. On its face, the task narrative references work relating to "sold properties" and the allocation is to only those properties that had been sold as of the date of the entry. The work related to efforts to confirm the that all funds relating to sold properties, not only from the sales themselves but also from post-sale reconciliations with the property managers had been received. The comment about the relationship or lack thereof between different tranches is simply wrong in this context. And, notably, there were many occasions that it took property managers many months to close out the accounting on their end. There also were instances that the post-sale reconciliation efforts of the property managers themselves were delayed due to various factors (e.g., delays receiving information from others such as utilities or vendors).
37	13	D	128	1/6/2020	AD	JR	reconciliation spreadsheet with several closed properties (.5)	the same objection as above and that the entry is lumped with multiple properties and time entry is almost 8 months after sale of the property at issue closed	The objection should be overruled. On its face, the task narrative references work relating to "closed properties" and the allocation is to only properties that had been sold as of the date of the entry. See also the response, above.

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 47 of 157 PageID #:65080

Row#	Response Page	Objectors' Exhibit	Line/Page Reference	Date	Billing Category	Time Keeper	Task Narrative(s)	Objection	Receiver's Response
38	13	D	129	2/19/2020	AD	JR	work on organization of closing documents from all closings (5.2)	this entry allocates 5.2 hours of attorney time for all closings even though the closing at issue for the specific property was on 5/22/19 – again a closing almost 9 months earlier	The objection should be overruled. The objection is incorrect that this task narrative reflects attorney time; the timekeeper for this task is a paralegal and reflected work related to the properties to which the time was allocated.
39	13	D	129	2/13/2020	во	JR	Review property manager's financial statements and perform a comparison analysis of both for all Equitybuild properties (3.9)		The objection should be overruled. The Receiver believes this entry related to both post-sale reconciliation efforts and the analysis of financial reporting from the property managers in the context of upcoming real estate tax payments. These activities unquestionably relate to the management of the real estate portfolio, which the Court has deemed to be allocable to the properties.
40	13	D	133	6/6/2020	AD	AEP	Assemble all files relating to any administrative or housing court proceedings pertaining to any receivership properties between 2018 and the present (2.4); reorganize same (1.4); begin preparation of spreadsheet listing all properties, associated litigation matters, judgment amounts, judgment dates, and payment status (3.2);	together for all properties and all litigation matters and	The objection should be overruled. The three tasks for which the objectors make the same objection are part of the same time entry, representing three separate incremental tasks. The work corresponding to this task description was needed for multiple purposes. The Receiver needed to provide notice of pending cases to prospective purchasers of each property. It was also important to identify all administrative or housing court proceedings in the Receiver's motion papers. The City often failed to provide notices of filing of administrative and housing court actions to the Receiver as a result of which the Receiver and his counsel discovered a number of City actions after default judgments had already been entered. When a particular property was owned by an EquityBuild special purpose entity, a judgment recorded against that property could become an encumbrance on every other property owned by that entity, which created obstacles to closing sales of the properties. The work reflected by the task at issue was part of a diligent effort to identify all violation notices, administrative actions, and housing court actions in order to both take corrective action and make disclosures in connection with sales.
41	13	D	143	1/5/2021	AD	JR	Organization and research property information related to original EquityBuild purchase dates, recording dates, Equitybuild debt and mechanic's lien regarding properties in receivership and previously acquired and sold properties and update Equitybuild portfolio spreadsheet (2.2)		The objection should be overruled. This work is similar in some respects to the work that was the subject of the 6/6/20 tasks discussed above. It also included work that more generally related to all properties in connection with identification of information relating to City of Chicago matters and would ultimately also be beneficial in connection with the claims process. As a result, allocation to all properties is correct. See also the responses above.

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 48 of 157 PageID #:65081

Row #	Response Page	Objectors' Exhibit	Line/Page Reference	Date	Billing Category	Time Keeper	Task Narrative(s)	Objection	Receiver's Response
42	14	С	55-71	various	Claims	ED / NM		tasks describing collection of information and documentation from the Lenders not allowed as a priming lien because they do not relate to (1) the implementation and management of an orderly summary claim-priority adjudication process or (2) the adjudication of claims	The objection should be overruled. Collection of information from all claimants, including the institutional lenders and investor lenders, was essential to understanding the nature of each claimants' claims. Such efforts by the Receiver and his counsel were fundamental to understanding the issues surrounding and relating to anticipated claims as well as designing the claim form, claims process, claims portal, and various related efforts, all of which were part of the implementation and management of an orderly summary claim-priority adjudication process. (See Dkt. 1030, at 2) Moreover, the objectors themselves state that "In 2019, the Receiver initiated a claims process designed to identify who held claims against the estate and whether those claims were allegedly secured by a lien on one or more of the estate's properties" (Dkt. 1210 at 22), which is undoubtedly a concession that this work was integral to the implementation and management of the claims process.
43	14	С	2130-32	various	Claims	JR		tasks describing claim form communication with claimants not allowed as a priming lien because they do not relate to (1) the implementation and management of an orderly summary claim-priority adjudication process or (2) the adjudication of claims	The objection should be overruled. Communication with claimants, including the institutional lenders and investor lenders, was essential collection of information needed to understanding the nature of each claimants' claims. Such efforts by the Receiver and his counsel was fundamental to understanding the issues surrounding and relating to anticipated claims as well as designing the claim form, claims process, claims portal, and various related efforts, all of which was part of the implementation and management of an orderly summary claim-priority adjudication process. In addition, the Receiver has made an effort to distinguish between communication relating to or not relating to (and thus deferred or otherwise not allocated): (1) the preservation, management, and liquidation of certain real estate belonging to the Receivership Estate; and (2) the implementation and management of an orderly summary claim-priority adjudication process. (See Dkt. 1030, at 2)
44	14	С	1313	6/18/2019	Claims	ED	regarding lender's counsel's questions about claim form (.3)	tasks describing review of claim forms not allowed as a priming lien because they do not relate to (1) the implementation and management of an orderly summary claim-priority adjudication process or (2) the adjudication of claims	Same as above.
45	14	c -	2144	3/24/2020	Claims	J. Wine	rollover claims (.9)	tasks describing review and analysis of rollover claims not allowed as a priming lien because they do not relate to (1) the implementation and management of an orderly summary claim-priority adjudication process or (2) the adjudication of claims	The objection should be overruled. Analysis of submitted claims is part of the implementation and management of an orderly summary claim-priority adjudication process. (See Dkt. 1030, at 2) Moreover, understanding the nature, effect, and incidence of the rollower of claims (either into or out of an interest in the properties) has been an essential part of determining and evaluating secured interests and priority between asserted liens. Such efforts are a key component of the Receiver's efforts to implement and manage an orderly summary claim-priority adjudication process, including enabling the Receiver to among other tasks, report to the Court and claimants on the nature of claims asserted against the properties, identify claimants to participate in the claims groups, provide notice to claimants, prepare the framing report, and various other claims-related tasks.

Row #	Response Page	Objectors' Exhibit	Line/Page Reference	Date	Billing Category	Time Keeper	Task Narrative(s)	Objection	Receiver's Response
46	15	С	331-343	various	Claims	various	various		The objection raised as to issues regarding credit bidding allocations should be overruled. The issues regarding credit bidding were part of the process regarding the sale of properties in Receivership estate. The briefing on such issues dealt largely with the how to implement such a process given the competing priority claims, and then the parameters for such bids. (Dkt. 232, 235, 240, 333, 359, 362, 363, 365, 376, 398, 404, 418, 455, 476). As a result of the implementation of credit bidding, the objectors sought to stop the entire sales process (See Dkt. 447 at 4-5), and also wanted to expand and control much of the process as part of the credit bid process (see, e.g., Dkt. 418, 430, 447), all of which was litigated before the Court. This process (and the large amount of briefing and effort created by the same objectors) impacted the sale process for all of the properties, and could not be more related to the items that have been approved by the Court for compensation from the lien. Significantly, the credit bidding procedures that the Court ultimately approved resulted from the collaborative efforts of the Receiver, his counsel, and counsel for certain institutional lenders. (Dkt. 415) In any event, the Court has also expressly found that work included in such activity have benefitted the estate. (Dkt. 710 at 3 (approving fees from July-Dec. 2019); Dkt. 614 at 3) Moreover, not one property in the estate was acquired through credit bidding procedures. In the two instances were a credit bid was made, it was subsequent withdrawn by the lender. These results demonstrate both that the Receiver was right to oppose more liberal credit bidding procedures, because in all instances the properties sold for more than any institutional lender was willing to pay. Thus, the Receiver's efforts directly contributed to and ensured that the most money that could be obtained in the marketplace by a willing purchaser or credit bidder was obtained, which benefits whoever will realize those funds at the end of the day, including t
47	16	С	1353	7/18/2019	ВО	KBD	proceeds for rent restoration and exchange correspondence regarding same (2.5)	Allocation of time associated with the implementation of the credit bid process are a component of the claims administration process precluded from a priming lien, as they relate to the treatment of the rights of various claimants in and to their collateral. It is inappropriate for the Receiver to allocate the credit bid implementation time to all of the receivership properties because these subsequent actions did not involve all of the secured creditors or all of the secured collateral.	The objection should be overruled. This task is not related to the credit bid process and thus the objection lodged is not applicable. Further, this example fails to support the objectors' argument because, on its face, the task was not allocated to all properties; rather, this task was allocated to only 53 properties. To the extent that the task entry is interpreted in any fashion to be related to the credit bid process, the response directly above applies.
48	16	С	1354	7/22/2019	во	KBD	analysis of property expense accounting, financial reports, and rent restoration issues (.8)	same objections as above	The objection should be overruled. This task is not related to the credit bid process and thus the objection lodged is not applicable. Further, this example fails to support the objectors' argument because, on its face, the task was not allocated to all properties; rather, this task was allocated to only 53 properties.
49	16	С	830	4/29/2019	ВО	KBD	property manager regarding payments,	Any lien related work should have been billed only to the properties that were subject to liens, rather than being spread across the entire sales pool.	The objection should be overruled. The objectors essentially argue that some entries are compound and relate to more than one thing. But each of these entries relate to tasks that encompassed subparts. The conference described communications with a property manager related to the payment of expenses as well as the release of liens. So while not all of the properties may have had liens on them, surely all of the properties incurred expenses, and therefore the task was properly allocated to all of the 39 properties managed by that particular property manager.

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 50 of 157 PageID #:65083

Row #	Response Page	Objectors' Exhibit	Line/Page Reference	Date	Billing Category	Time Keeper	Task Narrative(s)	Objection	Receiver's Response
50	16	С	2355	6/6/2020	AD	AEP	begin preparation of spreadsheet listing all properties, associated litigation matters, judgment amounts, judgment dates, and payment status (3.2)	same objection as above	Same as above. See also, supra, Receiver's response to same task entry (Ex. C, line 2355) objected to in Objectors' Response, p.10.
51	16	С	2356	6/6/2020	AD	AEP	reorganize same (1.4)	same objection as above	Same as above. See also, supra, Receiver's response to same task entry (Ex. C, line 2356) objected to in Objectors' Response, p.10.
52	17	С	389	12/12/2018	ВО	KBD	for city, M. Rachlis, and N. Mirjanich regarding property violations, repair planning, and receivership activities (1.5)	the Receiver apparently allocated time spent litigating, addressing, and tracking such infirmities across-the-board to a large number of the Properties even though it appears as if a much smaller number of the Properties actually were subject to the infirmities.	The objection should be overruled. The objection wrongly and with no basis presumes that the tasks related to a smaller number of properties. While some properties at times received more of the City's attention than others (e.g., properties with porches in disrepair), in fact, the tasks at issue related to the Receiver's efforts with respect to all properties in Chicago to improve communication with the City, reduce the City's targeting of EquityBuild properties (regardless of their condition or whether they were the subject of particular violation notices or litigation and in order to avoid or limit future violation notices), eliminate challenges to marketing and selling properties, and reduce the fees and expenses needed to preserve, manage, and liquidate the properties. In this way, the Receiver's efforts that are the subject of the tasks at issue were as much about being proactive to avoid and limit potential future expenses as they were reactive to address then existing circumstances involving particular properties. And, in fact, while those efforts did not eliminate future violation notices or costs they significantly reduced such instances and paved the way toward expeditious and less costly resolution of many subsequent notices from and disputes with the City, which was beneficial to all of the Chicago properties.
53	17	С	402	12/11/2018	во	NM	prepare for meeting with City attorney by creating a summary spreadsheet of Receiver work to address City violations and his plan for same (1.3)	same objection as above	Same as above.
54	17	С	405	12/12/2018	BO	NM	meeting with City attorney, K. Duff, and M. Rachlis regarding outstanding City violations, removing EquityBuild from the Scofflaw list, and the Receiver's plan of action with respect to properties with violations (1.5)	same objection as above	Same as above.
55	17	С	859	4/3/2019	ВО	KMP	Finalize communication to City regarding expenses for various properties, revise exhibits, and prepare electronic copy for email communication (.3)	same objection as above	The objection should be overruled. The objectors assume this related to fewer than all 106 properties located in Chicago, but the actual correspondence demonstrates that the allocation was proper.

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 51 of 157 PageID #:65084

Row#	Response Page	Objectors' Exhibit	Line/Page Reference	Date	Billing Category	Time Keeper	Task Narrative(s)	Objection	Receiver's Response
56	17	С	1288	6/25/2019	ВО	ED	email correspondence with property manager regarding past due utility bills (.2)	same objection as above	The objection should be overruled. The allocation is proper because the task at issue related to efforts in coordination with the property manager to address past due utility bills for the referenced 37 properties. This task was allocated to the 37 properties managed by that property manager at that time (two of the original 39 properties had been sold).
57	17	С	1805	11/26/2019	во	JR	Update spreadsheet for K. Duff pertaining to real estate taxes for certain properties (.6)	same objection as above	The objection should be overruled. The allocation is proper because the task at issue related to confirming, tracking, and preparing for payment of real estate taxes for the referenced 90 properties. This task was allocated to all of the 90 properties in Cook County that had not yet been sold. It is perfectly reasonable and appropriate that the Receiver's staff would devote time to tracking the status of real estate taxes for all properties in the Estate as part of his management of the real estate portfolio.
58	17	С	2117	3/3/2020	Claims	ED	preparation of summary of utility refund checks received and analysis of accounts in which to deposit funds (.4)	same objection as above	This entry related to both specific refunds and a process for handling refunds for all properties. Accordingly, the task was properly allocated.
59	17	С	2357	6/6/2020	AD	AEP	Assemble all files relating to any administrative or housing court proceedings pertaining to any receivership properties between 2018 and the present (2.4)	same objection as above	See supra, Receiver's response to same line objection (Ex. C, line 2357) in Objectors' Response, p.10.
60	17	С	2696	10/22/2020	AD	AEP	record remaining unresolved title exceptions associated with properties in tenth sales tranche (4317 S Michigan, 4533 S Calumet, 4750 S Indiana, 6217 S Dorchester, 7024 S Paxton, and 7701 S Essex), begin researching same and preparing action plan for discussion with title underwriter (2.3).	Receiver indiscriminately divided time equally among properties without addressing the magnitude of the infirmities or associated work involved	The objection should be overruled. It is based on supposition and conjecture that the time spent on each title exception would necessarily vary and the time spent should therefore be allocated proportionately. It further presumes, with no true basis, analysis, or proffer to the contrary that the allocation is indiscriminate. On its face, the task describes the work, shows the properties it related to, and provides a reasonable allocation among the properties. The objection seeks a degree of mathematical precision that the Court has said it would not require. (Dkt. 1184; cf. Bhd. of Ry. & S. S. Clerks, Freight Handlers, Exp. & Station Emp. v. Allen, 373 U.S. 113, 122, (1963) [finding with respect to allocation of different types of union expenditures, "[a]bsolute precision in the calculation of such proportion is not, of course, to be expected or required; we are mindful of the difficult accounting problems that may arise"); Skyline Advanced Tech. Services v. Shafer, 2020 WL 7025081, at *2 (N.D. Cal. Nov. 30, 2020) ("absolute precision is not required when calculating an award of attorneys' fees").

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 52 of 157 PageID #:65085

Row #	Response Page	Objectors' Exhibit	Line/Page Reference	Date	Billing Category	Time Keeper	Task Narrative(s)	Objection	Receiver's Response
61	18	С	1947	1/16/2020	ВО	NM	regarding new code	the Lenders' collateral should not be surcharged for the malfeasance of the Receiver's agents	The objection should be overruled. It presumes malfeasance based on nothing except timing. It ignores the reality that the properties under management were older, typically underfunded properties and that even well-funded and well-managed properties can be cited for matters that have nothing to do with whether or not the property is properly managed. For example, if a neighbor or passerby overfills the property's garbage can or places large items outside a waste bin, a citation can be issued by an inspector that is there before the property manager is even aware of the situation. In addition, the objectors' suggestion that the Receiver and his retained property managers had sufficient time to make the properties entirely code compliant ignores the reality of the situation faced in this Receivership where EquityBuild had allowed the properties to deteriorate into states of disrepair and the Receiver had to balance the cost of repairs with the benefit to the Estate and prioritize violations causing immediate safety concerns. And a number of the violations were the direct result of delays in the Receiver's ability to market and sell properties that was caused by the institutional lenders' scorched earth litigation strategy. The objection further ignores the fact that the City frequently sends "new" notices of violations based on inspections occurring many months earlier, and, despite regular and repeated notice from the Receiver, frequently failed to provide notice to the Receiver of code violation actions, which required action by the Receiver to clear the violation and protect the property against meritless notices. It further ignores the results of the work relating to the code violation notices, most of which were resolved with little to not cost to the property by the Receiver's counsel. Finally, the Court has repeatedly found that the Receiver's efforts to address building code violations provided a benefit to the estate as a whole and the individual properties involved.
62	18	Specific Allocation Report for Property #89	48	3/13/2019	AD	JR		Specific Properties should not have been billed for both the title premiums and the underlying title examinations.	See Receiver's Reply, Section II.A.7.
63	18	Specific Allocation Report for Property #89	49	3/14/2019	AD	JR	review chain of title for property (7600 S. Kingston) (1.9)	Specific Properties should not have been billed for both the title premiums and the underlying title examinations.	See Receiver's Reply, Section II.A.7.
64		Specific Allocation Report for Property #89	49	3/29/2019	AD	AEP	Review chain of title documents and finalize title examiner's worksheet for property in second marketing tranche (7600 S Kingston) (1.9)	have been billed for both the title premiums and the underlying title examinations.	See Receiver's Reply, Section II.A.7.
65	19	С	2205	4/21/2020	во	ED	call (.1)	Ambiguous entry lacking in detail.	The objection should be overruled. This task entry is part of a more detailed task narrative and cannot be evaluated independently. The full entry, which was provided with the Receiver's Second Quarter 2020 Fee Application, was " "Call and email correspondence with insurance agent regarding financial information requested in connection with underwriting process for insurance renewals (.3); call (.1); email correspondence (.3) with K. Duff regarding reimbursable amounts by properties." (See also, infra, Receiver's response to same line objection in Objectors' Response, p.20 n.13)
66	19	С	2282	5/21/2020	во	ED	calls (.2)	Ambiguous entry lacking in detail.	The objection should be overruled. This task entry is part of a more detailed task narrative and cannot be evaluated independently. The full entry, which was provided with the Receiver's Second Quarter 2020 Fee Application, was "Review draft summary report from accountant (.6); calls (.2); and email correspondence (.3) with accountant to discuss questions and comments regarding same." The objectors do not object to the email correspondence, only the calls. (See also, infra, Receiver's response to same line objection in Objectors' Response, p.20 n.13)

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 53 of 157 PageID #:65086

Row#	Response Page	Objectors' Exhibit	Line/Page Reference	Date	Billing Category	Time Keeper	Task Narrative(s)	Objection	Receiver's Response
67	19	С	2521	7/9/2020	Claims	ED		Ambiguous entry lacking in detail.	The objection should be overruled. This task entry is part of a more detailed task narrative and cannot be evaluated independently. The full entry, which was provided with the Receiver's Third Quarter 2020 Fee Application, was "Review chart from accountant relating to reimbursable amounts from proceeds of sold properties (.3); and call (.1); email correspondence (.2) regarding same." (See also, infra, Receiver's response to same line objection in Objectors' Response, p.20 n.13)
68	19	С	2192	4/20/2020	AD		review due diligence documents received from property manager for various properties (1.3)	Lack of detail	See supra , Receiver's response to same line objection (Ex. C., line 2192) in Objectors' Response, p.12.
69	19	С	2193	4/20/2020	AD		conference call with K. Duff, M. Rachlis, A. Porter and real estate brokers related to current properties under contract and related matters and issues with closings (1.0)		See supra, Receiver's response to same line objection (Ex. C., line 2193) in Objectors' Response, p.12.
70	20 n.13	С	2205	4/21/2020	ВО	ED	call (.1)	Lack of detail	See supra , Receiver's response to same line objection (Ex. C., line 2205) in Objectors' Response, p.19.
71	20 n.13	С	2282	5/21/2020	ВО	ED	calls (.2)	Lack of detail	See supra, Receiver's response to same line objection (Ex. C., line 2282) in Objectors' Response, p.19.
72	20 n.13	С	2521	7/9/2020	Claims	ED	and call (.1)	Lack of detail	See supra , Receiver's response to same line objection (Ex. C., line 2521) in Objectors' Response, p.19.

Exhibit 2

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 55 of 157 PageID #:65088

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Ob	jection
	Keeper	Rate	Hours	Descripti on	Cost		
August-18 Business Ope	erations	8/20/2018	KBD	390	0.2 office conference with M. Adler regarding communication with insurance broker and study correspondence regarding same (.2)	\$	78.00
August-18 Business Ope	erations	8/21/2018	KBD	390	0.1 review message from and information relating to insurance broker (.1).	\$	39.00
August-18 Business Ope	erations	8/22/2018	KBD	390	0.3 review correspondence from and office conference with M. Adler regarding communications with insurance broker (.3)	\$	117.00
August-18 Business Ope	erations	8/23/2018	KBD	390	2.2 study property management records, rent rolls, and profit and loss statements (2.2)	\$	858.00
August-18 Business Ope	erations	8/24/2018	KBD	390	0.2 review correspondence from M. Adler regarding payment of insurance premium and properties covered under general liability policy (.2).	\$	78.00
August-18 Business Ope	erations	8/25/2018	KBD	390	0.1 draft correspondence to M. Adler regarding property insurance issues (.1)	\$	39.00
August-18 Business Ope	erations	8/27/2018	KBD	390	0.2 exchange correspondence with M. Adler regarding insurance broker communication and coverage issues (.2)	\$	78.00
August-18 Business Ope	erations	8/30/2018	KBD	390	0.2 office conference with E. Duff and A. Porter regarding cash flow and lockbox issue (.2)	\$	78.00
August-18 Business Ope	erations	8/30/2018	KBD	390	0.2 Office conference with M. Adler regarding efforts to replace insurance coverage and related requests for information relating to corporate, property, and individual defendants (.2)	\$	78.00
August-18 Business Ope	erations	8/31/2018	KBD	390	0.1 study correspondence regarding insurance premiums (.1)	\$	39.00
August-18 Business Ope	erations	8/31/2018	KBD	390	0.1 review correspondence with bank representatives regarding wire transfer request (.1)	\$	39.00
August-18 Asset Dispos	ition	8/30/2018	AEP	390	0.8 Legal research regarding sale of assets.	\$	312.00
August-18 Business Ope		8/23/2018	AEP	390	O.4 Teleconference with EquityBuild employee regarding difficulties interfacing with property managers and scheduling of meeting to discuss critical issues (.4)	\$	156.00
August-18 Business Ope	erations	8/23/2018	MBA	390	0.1 Email exchange with insurance broker regarding additional information relating to premiums owed (.1)	\$	39.00
August-18 Business Ope		8/23/2018	MBA	390	0.3 review material received from broker consisting of back-up supporting broker's invoice for premiums for change endorsements to Equity Build policies (.3)	\$	117.00
August-18 Business Ope	erations	8/23/2018	MBA	390	0.2 further email exchanges and telephone conference with broker relating to status of insurance and premiums and planning as to same (.2)	\$	78.00
August-18 Business Ope	erations	8/23/2018	MBA	390	0.3 conference with Mr. Duff reporting on status of insurance-related issues, including upcoming deadline for installment payment of financed policy premiums (.3)	\$	117.00
August-18 Business Ope	erations	8/23/2018	MBA	390	0.2 prepare for and conduct telephone conference with potential, new insurance broker regarding investigating options for reducing costs of insurance premiums (.2)	\$	78.00
August-18 Business Ope	erations	8/23/2018	MBA	390	0.5 follow-up email exchange with him providing him with requested documents for investigating alternate insurance arrangements (.5).	\$	195.00
August-18 Business Ope	erations	8/24/2018	AEP	390	0.4 teleconference with property manager regarding lockbox procedures (.4)	\$	156.00
August-18 Business Ope		8/24/2018	AEP	390	0 teleconference with EquityBuild employee regarding budgeting issues and going-forward management of portfolios.	\$	-
August-18 Business Ope	erations	8/24/2018	ED	390	1.2 Review documentation and correspondence relating to lockbox, escrow, and reserve funds (1.2)	\$	468.00
August-18 Business Ope		8/24/2018	ED	390	1 calls and email correspondence with property managers regarding same (1.0)	\$	390.00
August-18 Business Ope		8/24/2018	ED	390	0.9 prepare form of notice letter to lockbox banks (.9).	\$	351.00
August-18 Business Ope		8/24/2018	MBA	390	0.3 Telephone conference with insurance broker regarding planning, including premiums that are falling due, his questions as to dealings with certain EquityBuild employees as to personal insurance wholly unrelated to receivership assets, and other details relating to coverage (.3)	\$	117.00
August-18 Business Ope	erations	8/24/2018	MBA	390	0.1 conference with Mr. Porter regarding sums due as premiums (.1)	\$	39.00
August-18 Business Ope		8/24/2018	MBA	390	0.2 conference with Mr. Duff as to planning as to insurance-related matters, including upcoming premium payments (.2)	\$	78.00
August-18 Business Ope	erations	8/24/2018	MBA	390	0.2 email exchange with broker with wire transfer information for premium payment and toward same to Ms. Pritchard with explanation (.2)	\$	78.00
August-18 Business Ope	erations	8/24/2018	MBA	390		\$	312.00
August-18 Business Ope	erations	8/24/2018	MBA	390	0.3 pull together additional material requested by potential new insurance broker for exploring alternate insurance coverage, and email exchange with him regarding same (.3).	\$	117.00
August-18 Business Ope	erations	8/25/2018	AEP	390	0.5 Teleconference with K. Duff regarding preparation for meeting with property manager, strategy for leveraging employee information and portfolio management and budgeting issues.	\$	195.00
August-18 Business Ope	erations	8/25/2018	AW	140	1.6 Attention to emails from management companies (1.6)	\$	224.00
August-18 Business Ope		8/27/2018	ED	390	0.9 Review and analysis of documents and related information regarding lockbox, reserve, and escrow arrangements (.9)	\$	351.00
August-18 Business Ope	erations	8/27/2018	ED	390	0.4 follow up on acknowledgements from bank regarding lockbox account status (.4).	\$	156.00
August-18 Business Ope		8/27/2018	MBA	390	0.1 Email exchange with new insurance broker regarding deductibles applicable to current CGL coverage (.1)	\$	39.00
August-18 Business Ope	erations	8/27/2018	MBA	390	0.3 review email from Receiver responding to questions posed by current insurance broker, and email to broker regarding same (.3)	\$	117.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 56 of 157 PageID #:65089

Entry Date Time	Time Keener	Took	Task	Task Assessment Category	61	nia ation
Entry Date Time Keeper	Time Keeper Rate	Task Hours	Descripti on	Task Assessment Category Cost	U	ojection
August-18 Business Operations	8/27/2018	MBA	390	0.5 finish preparing email to Mr. Duff responding to his insurance-related questions, including deductibles applicable to coverage, and review of policies in connection with same (.5).	\$	195.00
August-18 Business Operations	8/28/2018	AEP	390	0.2 Conference with colleague regarding identification of entities to be insured (.2)	\$	78.00
August-18 Business Operations	8/28/2018	MBA	390	0.1 Review and respond to email from potential insurance broker regarding status and preliminary feedback as to potential to replace existing insurance program with coverage entailing lower premiums (.1)	\$	39.00
August-18 Business Operations	8/28/2018	MBA	390	0.1 conference with Mr. Duff and Mr. Porter reporting on same (.1)	\$	39.00
August-18 Business Operations	8/28/2018	MBA	390	0.1 review and respond to emails from Mr. Duff and Mr. Porter relating to insurance-related issues.(.1)	\$	39.00
August-18 Business Operations	8/28/2018	MBA	390	0.2 conference with Mr. Duff regarding update as to identifying income stream and operating expenses (.2)	\$	78.00
August-18 Business Operations	8/28/2018	NM	260	Study outstanding correspondence from K. Duff, property management company, EquityBuild employees, and others and respond to same (.6)		156.00
August-18 Business Operations	8/30/2018	AW	140	0.4 communicate with M. Adler regarding service of notice on insurance company and serve as per her request (.4)	\$	56.00
August-18 Business Operations	8/30/2018	ED	390	0.2 Confer with Receiver and counsel regarding lockbox accounts (.2)	\$	78.00
August-18 Business Operations	8/30/2018	MBA	390	0.2 Revise letter to Insurance Broker regarding order appointing receivership (.2)	\$	78.00
August-18 Business Operations	8/30/2018	MBA	390	0.3 Telephone conference with potential insurance broker regarding results of his firm's efforts to locate equivalent insurance coverage at lower premiums (.3)		117.00
August-18 Business Operations	8/30/2018	MBA	390	0.3 email exchange and follow-up telephone conference with insurance broker regarding his request for immediate repayment of sums advanced by his firm for premiums arising from change endorsements (.3)	\$	117.00
August-18 Business Operations	8/30/2018	NM	260	0.1 Study correspondence from K. Duff and A. Porter regarding properties (.1)	\$	26.00
August-18 Business Operations	8/31/2018	AW	140	0.1 Attention to email from insurance broker (.1)	\$	14.00
August-18 Business Operations	8/31/2018	KMP	140	Communicate with bank representative regarding forms and requirements for initiation of wire transfer for payment of property liability insurance (.2)	\$	28.00
August-18 Business Operations	8/31/2018	MBA	390	0.4 Prepare for and conduct telephone interview with insurance broker regarding insurance related issues (.4)	\$	156.00
August-18 Business Operations	8/31/2018	MBA	390	0.1 Review emails from insurance broker regarding request from mortgagee for corrected certificate of insurance and regarding updating named insured on policies issued to Receivership Defendants, and forward same for review to Messrs. Duff and Porter (.1)	\$	39.00
August-18 Business Operations	8/31/2018	MBA	390	1.4 review email sent by him in response to Notice of Receivership, and voluminous attachments to same relating to insurance-related issues (1.4)	\$	546.00
August-18 Business Operations	8/31/2018	MBA	390	0.3 further email exchanges with broker in follow-up to material he sent and phone conference (.3)	\$	117.00
August-18 Business Operations	8/31/2018	MBA	390	0.2 review new Named Insured endorsement received from broker and draft revised language encompass scope of Receivership Estate as defined by Court's order appointing receiver (.2)	\$	78.00
August-18 Business Operations	8/31/2018	MBA	390	0.1 conference with Mr. Duff relating to insurance premiums and possible efforts to reduce same (.1).	\$	39.00
August-18 Business Operations	8/31/2018	MBA	390	0.1 conference and email exchange with Mr. Duff regarding same (.1)	\$	39.00
September-18 Asset Disposition	9/5/2018	KBD	390	0.2 study correspondence from potential real estate brokers and draft correspondence to A. Porter regarding same (.2)	\$	78.00
September-18 Asset Disposition	9/5/2018	KBD	390	0.1 study correspondence from A. Porter regarding potential real estate broker (.1).	\$	39.00
September-18 Asset Disposition	9/6/2018	KBD	390	0.1 Review correspondence from A. Porter regarding potential real estate broker (.1)	\$	39.00
September-18 Asset Disposition	9/6/2018	KBD	390	0.1 office conference with M. Rachlis and A. Porter regarding meeting with another potential real estate broker (.1).	\$	39.00
September-18 Asset Disposition	9/13/2018	KBD	390	0.9 Prepare for meetings with prospective brokers (.9)	\$	351.00
September-18 Asset Disposition	9/13/2018	KBD	390	2.5 meet with prospective brokers (2.5)	\$	975.00
September-18 Asset Disposition	9/13/2018	KBD	390	1.2 office conference is with M. Rachlis and A. Porter regarding same (1.2)	\$	468.00
September-18 Asset Disposition	9/13/2018	KBD	390	0.4 study draft correspondence from M. Rachlis regarding request for proposals from real estate brokers (.4).	\$	156.00
September-18 Asset Disposition	9/18/2018	KBD	390	0.3 exchange correspondence and office conference with A. Porter regarding same (.3).	\$	117.00
September-18 Business Operations	9/2/2018	KBD	390	0.1 review correspondence from E. Duff regarding communication as to borrower ownership structure, rent stream, debt service, and property inspection (.1)	\$	39.00
September-18 Business Operations	9/4/2018	KBD	390	0.2 study various communications from property management and real estate firms regarding real estate related service (.2)	\$	78.00
September-18 Business Operations	9/4/2018	KBD	390	0.1 telephone conference with bank regarding wire transfer for payment of insurance (.1)	\$	39.00
September-18 Business Operations	9/5/2018	KBD	390	O.2 exchange correspondence with M. Adler regarding insurance premiums bills, insurance claim, and deductible issue (.2)	\$	78.00
September-18 Business Operations	9/17/2018	KBD	390	0.1 exchange correspondence with potential property manager (.1).	\$	39.00
September-18 Business Operations	9/18/2018	KBD	390	0.3 study correspondence from and office conference with M. Adler regarding outstanding insurance endorsements and premium payments (.3)	\$	117.00
September-18 Business Operations	9/18/2018	KBD	390	0.1 review correspondence from insurance broker regarding outstanding premium payments (.1)	\$	39.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 57 of 157 PageID #:65090

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
Entry Date	Keeper	Rate	Hours	Descripti	Cost Assessment Category	U	bjection
September-18 Busi	iness Operations	9/19/2018	KBD	on 390	0.2 Study correspondence regarding payment of insurance (.2)	\$	78.00
September-18 Busi		9/19/2018	KBD	390	0.1 office conference with and review correspondence from E. Duff regarding same (.1)	\$	39.00
September-18 Busi		9/20/2018	KBD	390	exchange correspondence regarding insurance payment and office conference with K. Pritchard regarding same (.2)	\$	78.00
September-18 Busi	iness Operations	9/24/2018	KBD	390	0.1 draft correspondence to employee regarding communications with respect to offers or interest regarding property portfolio (.1)	\$	39.00
September-18 Busi	iness Operations	9/24/2018	KBD	390	0.3 study correspondence from various brokers and property managers regarding offered services (.3)	\$	117.00
September-18 Busi	iness Operations	9/24/2018	KBD	390	0.1 exchange correspondence with regarding payment of property insurance premium (.1)	\$	39.00
September-18 Asse		9/5/2018	AEP	390	O.3 Teleconference with real estate broker/advisor regarding potential retention in connection with orderly liquidation of EquityBuild portfolio.	\$	117.00
September-18 Asse	et Disposition	9/6/2018	AEP	390	0.6 Teleconference with potential broker in connection with appraisal, marketing, and liquidation of receivership properties.	\$	234.00
September-18 Asse	et Disposition	9/6/2018	MR	390	 Conferences with K. Duff, A. Porter regarding strategy on disposition of property, review information and follow up regarding same. 	\$	390.00
September-18 Asse	et Disposition	9/7/2018	MR	390	0.3 Further conferences regarding liquidation strategy with K. Duff.	\$	117.00
September-18 Asse	et Disposition	9/13/2018	AEP	390	1.5 Meeting with prospective brokers regarding possible engagement to sell portfolio assets (1.5)	\$	585.00
September-18 Asse	et Disposition	9/13/2018	AEP	390	1.5 meeting with other prospective brokers regarding possible engagement to sell portfolio assets (1.5)	\$	585.00
September-18 Asse	et Disposition	9/13/2018	AEP	390	1.5 meeting with third group of prospective brokers regarding possible engagement to sell portfolio assets (1.5).	\$	585.00
September-18 Asse	et Disposition	9/13/2018	MR	390	5.8 Attention to issues regarding various strategies on disposition of properties and meetings regarding same with K.Duff, A. Porter and third party experts (5.8)	\$	2,262.00
September-18 Asse	et Disposition	9/13/2018	MR	390	1 draft letter regarding same (1.0).	\$	390.00
September-18 Asse		9/13/2018	NM	260	0.4 Office conference with K. Duff, A. Porter, E. Duff, and M. Rachlis regarding conversations re potential real estate brokers' presentations.	\$	104.00
September-18 Asse	et Disposition	9/14/2018	ED	390	0.3 Review information regarding valuation of properties and potential offers and confer with M. Rachlis regarding same.	\$	117.00
September-18 Busi	iness Operations	9/13/2018	MBA	390	0.1 Review most recent email from insurance broker requesting payment of invoice and draft response to same (.1)	\$	39.00
September-18 Busi	iness Operations	9/18/2018	AW	140	0.1 Attention to email regarding outstanding insurance invoice and communicate with K. Duff regarding same (.1)	\$	14.00
September-18 Busi	iness Operations	9/18/2018	AW	140	0.3 search through emails for information regarding same (.3)	\$	42.00
September-18 Busi	iness Operations	9/18/2018	KMP	140	0.2 Conference with K. Duff and review communications from M. Adler regarding required payments to insurer and agent (.2)	\$	28.00
September-18 Busi	iness Operations	9/18/2018	MBA	390	0.1 Review emails and voicemails from insurance broker and K. Duff relating to outstanding invoice from broker (.1)	\$	39.00
September-18 Busi	iness Operations	9/18/2018	MBA	390	0.1 conference with K. Duff reporting on same and emails to broker, K. Duff, and K. Pritchard regarding same, as well as planning as to upcoming deadline to pay premium finance installment (.1).	\$	39.00
September-18 Busi	iness Operations	9/18/2018	MBA	390	0.1 telephone conference with broker regarding same (.1)	\$	39.00
September-18 Busi	iness Operations	9/19/2018	AW	140	0.1 email K. Duff and N. Mirjanich regarding same and discuss what steps to take (.1)	\$	14.00
September-18 Busi	iness Operations	9/19/2018	AW	140	0.5 search email accounts for information regarding same (.5)	\$	70.00
September-18 Busi	iness Operations	9/19/2018	KMP	140	0.1 Communications with insurer requesting confirmation of accepted methods of payment and conference with K. Duff regarding same (.1)	\$	14.00
September-18 Busi	iness Operations	9/19/2018	MBA	390	0.1 Conference with Mr. Duff regarding insurance-related matters.	\$	39.00
September-18 Busi	iness Operations	9/24/2018	KMP	140	0.2 Review communications from insurance broker regarding cancellation notice for property insurance, and communications with K. Duff and M. Adler regarding scheduling payment (.2)	\$	28.00
September-18 Busi	iness Operations	9/27/2018	KMP	140	0.1 Review email communication from insurance broker regarding cancellation notices for additional insurance policies (.1)	\$	14.00
September-18 Busi	iness Operations	9/28/2018	MBA	390	Review email from insurance broker relating to upcoming deadlines to pay insurance premiums, and forward to K. Duff and K. Pritchard.	\$	39.00
October-18 Asse	et Disposition	10/17/2018	KBD	390	0.4 study and revise press release regarding retention of broker and asset manager (.4).	\$	156.00
October-18 Asse		10/22/2018	KBD	390	0.7 lega research regarding sale procedures(.7)	\$	273.00
October-18 Asse	•	10/22/2018	KBD	390	0.1 draft correspondence to real estate broker regarding terms for sales (.1).	\$	39.00
October-18 Asse		10/24/2018	KBD	390	1.5 conference with real estate broker regarding portfolio analysis, strategy for property disposition, and prioritization (1.5)	\$	585.00
October-18 Asse	et Disposition	10/24/2018	KBD	390	0.3 study updated portfolio analysis summary (.3)	\$	117.00
October-18 Asse		10/25/2018	KBD	390	0.3 study draft sealed bid instructions (.3).	\$	117.00
October-18 Asse	•	10/26/2018	KBD	390	0.2 Exchange correspondence with real estate broker and M. Rachlis regarding public sale advertising.	\$	78.00
October-18 Asse		10/29/2018	KBD	390	0.2 office conference with N. Mirjanich regarding presentation of asset disposition plan to the court (.2).	\$	78.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 58 of 157 PageID #:65091

Future Date	Time Keeper	Table	Table	Tools Assessment Outside	٥h	in attan
Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
Keepei	Nate	Hours	on	COST		
October-18 Asset Disposition	10/31/2018	KBD	390	0.7 Telephone conference with broker and asset management firm representatives, M. Rachlis, and A. Porter regarding disposition strategy and timing (.7)	\$	273.00
October-18 Asset Disposition	10/31/2018	KBD	390	0.1 draft correspondence to same (.1)	\$	39.00
October-18 Business Operations	10/4/2018	KBD	390	0.2 office conference with K. Pritchard and review correspondence from insurance payment and telephone	\$	78.00
Ostalasa 10 Descinasa Ossantiasa	40/44/0040	KDD	200	conference with bank representative regarding same (.2)	•	00.00
October-18 Business Operations	10/11/2018	KBD	390	0.1 exchange correspondence with A. Porter regarding insurance endorsement issue (.1).	\$	39.00
October-18 Business Operations	10/14/2018	KBD	390	0.2 study portfolio spreadsheet prepared by A. Porter (.2).	\$	78.00
October-18 Business Operations	10/15/2018	KBD	390	0.1 telephone conference with bank representative regarding wire transfer (.1).	\$	39.00
October-18 Business Operations	10/16/2018	KBD	390	0.1 exchange correspondence with property manager regarding funds transfer (.1)	\$	39.00
October-18 Business Operations	10/17/2018	KBD	390	0.1 review correspondence from M. Adler regarding insurance premium and fees (.1)	\$	39.00
October-18 Business Operations	10/19/2018	KBD	390	0.1 exchange correspondence with representative for potential property management services firm (.1)	\$	39.00
October-18 Business Operations	10/21/2018	KBD	390	0.4 Study correspondence from A. Porter and M. Rachlis regarding potential receivership expenses and real estate portfolio.	\$	156.00
October-18 Business Operations	10/22/2018	KBD	390	0.1 exchange various correspondence regarding lender appraisal request (.1)	\$	39.00
October-18 Business Operations	10/23/2018	KBD	390	0.1 office conference with and K. Pritchard regarding payment of real estate taxes (.1).	\$	39.00
October-18 Business Operations	10/26/2018	KBD	390	0.2 study correspondence from M. Adler regarding insurance coverage for lenders under CGL policy (.2)	\$	78.00
October-18 Business Operations	10/31/2018	KBD	390	0.2 study revised portfolio spreadsheetfrom A. Porter (.2)	\$	78.00
October-18 Asset Disposition	10/3/2018	AW	140	0.4 Research regarding sale of real estate	\$	56.00
October-18 Asset Disposition	10/12/2018	AEP	390	1.5 Conference with receivership team and brokerage firm regarding immediate needs of receivership estate,	\$	585.00
·				legal options, assignment of responsibilities, and confidentiality issues.	•	
October-18 Asset Disposition	10/15/2018	AEP	390	0.7 meeting with K. Duff, E. Duff, and M. Rachlis regarding asset disposition strategies (.7).	\$	273.00
October-18 Asset Disposition	10/16/2018	AEP	390	0.2 Teleconference with potential purchaser seeking acquisition of entire EquityBuild portfolio.	\$	78.00
October-18 Asset Disposition	10/16/2018	AW	140	0.1 Communicate with retained broker regarding issues with requested reports.	\$	14.00
October-18 Asset Disposition	10/17/2018	AEP	390	1.7 Conference call with K. Duff, E. Duff, M. Rachlis, and N. Mirjanich and receivership brokers regarding status of	\$	663.00
				investigation into values of portfolio assets and suitability of certain properties for immediate versus deferred sale.		
October-18 Asset Disposition	10/17/2018	ED	390	1.3 Call with real estate advisors.	\$	507.00
October-18 Asset Disposition	10/18/2018	AW	140	1.1 Create a list of potential buyers of EB portfolio based on emails, voicemails, and notes (1.1)	\$	154.00
October-18 Asset Disposition	10/18/2018	AW	140	0.1 email K. Duff and A. Porter regarding same (.1)	\$	14.00
October-18 Asset Disposition	10/18/2018	AW	140	0.1 brief phone call with broker regarding same (.1).	\$	14.00
October-18 Asset Disposition	10/22/2018	ED	390	2.2 Meet with property advisor, Receiver, M. Rachlis, A. Porter, and N. Mirjanich regarding development of	\$	858.00
·				strategy for portfolio liquidation (2.2)	•	
October-18 Asset Disposition	10/22/2018	ED	390	0.6 preparation for same (.6)	\$	234.00
October-18 Asset Disposition	10/22/2018	ED	390	1 review information from property advisor and email regarding notes and comments (1.0).	\$	390.00
October-18 Asset Disposition	10/22/2018	MR	390	2.2 Prepare for and participate in call with broker regarding various issues and on strategy for sales.	\$	858.00
October-18 Asset Disposition	10/24/2018	AEP	390	1.5 Conference call with receivership team and outside brokers regarding latest strategies for marketing and selling portfolio properties.	\$	585.00
October-18 Asset Disposition	10/25/2018	MR	390	0.4 Attention to sealed bid instruction (.4)	\$	156.00
October-18 Asset Disposition	10/26/2018	MR	390	0.5 Emails and follow up on public sale issue (.5)	\$	195.00
October-18 Asset Disposition	10/29/2018	AW	140	0.1 Attention to email exchanges with broker regarding potential buyers.	\$	14.00
October-18 Asset Disposition	10/30/2018	MR	390	0.6 Conference regarding issues on liquidation.	\$	234.00
October-18 Asset Disposition	10/31/2018	AEP	390	0.5 Conference call with title company representatives regarding title search needs associated with investigation into EBF loans and future closings (.5)	\$	195.00
October-18 Asset Disposition	10/31/2018	MR	390	1.4 participate in conference call on liquidation issues and follow up regarding various issues on same (1.4).	\$	546.00
October-18 Business Operations	10/3/2018	KMP	140	0.1 Draft form for receivership estate bank relating to wire transfer for payment of premium insurance funding and conference with K. Duff regarding execution of same (.1)	\$	14.00
October-18 Business Operations	10/4/2018	KMP	140	Communications with receivership estate bank forwarding executed form for wire transfer for payment of premium insurance funding (.1)	\$	14.00
October-18 Business Operations	10/4/2018	KMP	140	0.1 communications with insurance broker confirming payment of same (.1).	\$	14.00
October-18 Business Operations	10/15/2018	NM	260	0.4 Telephone conference with creditor and correspond with A. Watychowicz and K. Pritchard regarding same and	-	104.00
·				account with same (.4)		
October-18 Business Operations	10/16/2018	KMP	140	0.1 Review communications relating to insurance premiums and conferences with K. Duff and M. Adler regarding same.		14.00
October-18 Business Operations	10/17/2018	KMP	140	0.1 Review additional communications relating to insurance premiums and conference with M. Adler regarding same (.1)	\$	14.00
October-18 Business Operations	10/17/2018	KMP	140	0.4 compile information and conference with K. Duff and M. Rachlis regarding operating income and various expenses (.4)	\$	56.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 59 of 157 PageID #:65092

Entry Date Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
Entry Date Time Keeper	Rate	Hours	Descripti	Cost Assessment Category	U	bjection
Ostalian 40 Business Orangtians	40/47/0040	KMD	on			40.00
October-18 Business Operations	10/17/2018	KMP	140	0.3 prepare wire transfer forms for payment of September property expenses and October insurance premium financing agreement and communications with bank to initiate same (.3).	\$	42.00
October-18 Business Operations	10/17/2018	MBA	390	0.2 Telephone conference with insurance broker requesting information sought by Receiver as to exact amount,	\$	78.00
				including finance charges and late fees of sums owed to bring premium finance account current for property and CGL coverage (.2)		
October-18 Business Operations	10/17/2018	MBA	390	0.6 email exchanges with broker relating to, seeking clarification of, and obtaining corrected calculation of same	\$	234.00
Octob on 40 Business On costinue	40/47/0040	MADA	200	(.6)	•	00.00
October-18 Business Operations	10/17/2018	MBA	390	0.1 email confirming same to broker (.1).	\$	39.00
October-18 Business Operations	10/22/2018	AEP	390 390	1.4 Research current property tax delinquency amounts.	\$ \$	546.00 507.00
October-18 Business Operations	10/25/2018	MBA		1.3 Review insurance requirements of those lending agreements compared to CGL policy, including whether specified properties are scheduled on CGL and Property policies (1.3)	·	
October-18 Business Operations	10/25/2018	MBA	390	0.3 draft email to broker with follow-up questions, including terms and conditions of Property Master Agreement compared to insurance specifications of lending agreements (.3)	\$	117.00
October-18 Business Operations	10/25/2018	MBA	390	0.1 conference with Mr. Duff reporting on status of project (.1)	\$	39.00
October-18 Business Operations	10/25/2018	MBA	390	0.1 conference and email to Ms. Watychowicz relating to assignment for her to determine whether properties are	\$	39.00
·				scheduled on Property and CGL policies (.1).	·	
October-18 Business Operations	10/26/2018	AW	140	1.3 work on project from M. Adler regarding comparison of different properties schedules (1.3)	\$	182.00
October-18 Business Operations	10/26/2018	AW	140	0.1 report results (.1).	\$	14.00
October-18 Business Operations	10/26/2018	MBA	390	0.1 Conference with A. Watychowicz regarding assignment to compare properties listed on specified lending documents with those scheduled on property and CGL policies (.1)	\$	39.00
October-18 Business Operations	10/26/2018	MBA	390	0.2 review email from insurance broker regarding questions posed relating to property and CLG policies, and	\$	78.00
				forward same to K. Duff with cover note (.2).		
October-18 Business Operations	10/29/2018	MBA	390	0.3 Review work sheets received from A. Watychowicz reflecting her comparison of the list of properties identified on certain lending documents, compared to the property scheduled on the CGL and Property policies (.3)	\$	117.00
October-18 Business Operations	10/29/2018	MBA	390	1.5 review email from insurance broker responding to questions (1.5)	\$	585.00
October-18 Business Operations	10/29/2018	MBA	390	0.2 email exchange with broker following-up on Receiver's request to confirm coverage (.2).	\$	78.00
October-18 Business Operations	10/30/2018	AEP	390	0.4 Research regarding status of property tax delinquencies.	\$	156.00
November-18 Asset Disposition	11/1/2018	KBD	390	0.3 Study broker portfolio analysis and comparison to alternative approaches (.3)	\$	117.00
November-18 Asset Disposition	11/1/2018	KBD	390	0.3 office conference with N. Mirjanich regarding liquidation plan preparation and content (.3)	\$	117.00
November-18 Asset Disposition	11/2/2018	KBD	390	0.1 Study correspondence from broker regarding proposed revisions to property sale procedures.	\$	39.00
November-18 Asset Disposition	11/5/2018	KBD	390	0.2 Telephone conference with asset management firm regarding sale procedures, priority of sales, and property repair cost.	\$	78.00
November-18 Asset Disposition	11/6/2018	KBD	390	0.2 Office conference with N. Mirjanich regarding liquidation plan apprach timing, gathering information from broker, and ex parte considerations	\$	78.00
November-18 Asset Disposition	11/7/2018	KBD	390	0.2 study correspondence from N. Mirjanich and asset manager regarding liquidation plan (.2).	\$	78.00
November-18 Asset Disposition	11/8/2018	KBD	390	0.5 Study revised portfolio analysis (.5)	\$	195.00
November-18 Asset Disposition	11/8/2018	KBD	390	1.4 telephone conference with broker, M. Rachlis, A. Porter and N. Mirjanich regarding same and strategy (1.4)	\$	546.00
November-18 Asset Disposition	11/11/2018	KBD	390	0.2 study revisions to draft liquidation plan (.2).	\$	78.00
November-18 Asset Disposition	11/12/2018	KBD	390	0.2 Study draft liquidation plan (.2)	\$	78.00
November-18 Asset Disposition	11/12/2018	KBD	390	0.1 study motion for leave to file under seal (.1)	\$	39.00
November-18 Asset Disposition	11/13/2018	KBD	390	0.5 Study and revise draft liquidation plan (.5)	\$	195.00
November-18 Asset Disposition	11/13/2018	KBD	390	0.2 office conference with N. Mirjanich regarding same (.2)	\$	78.00
November-18 Asset Disposition	11/14/2018	KBD	390	0.2 Study lender opposition to motion to present liquidation plan in camera (.2)	\$	78.00
November-18 Asset Disposition	11/14/2018	KBD	390	0.5 study revisions to liquidation plan and exchange correspondence with N. Mirjanich regarding same (.5).	\$	195.00
November-18 Asset Disposition	11/15/2018	KBD	390	0.5 Study revised draft liquidation plan and various correspondence regarding same (.5)	\$	195.00
November-18 Asset Disposition	11/15/2018	KBD	390	0.4 telephone conference with and study correspondence from asset manager and broker regarding same and sale planning (.4)	\$	156.00
November-18 Asset Disposition	11/15/2018	KBD	390	0.2 study lender objections to liquidation plan (.2)	\$	78.00
November-18 Asset Disposition	11/16/2018	KBD	390	0.6 Telephone conference with broker representatives, M. Rachlis, and N. Mirjanich regarding draft liquidation plan and confidentiality considerations (.6)	\$	234.00
November-18 Asset Disposition	11/16/2018	KBD	390	0.3 study revised liquidation plan and review correspondence from N. Mirjanich regarding same (.3)	\$	117.00
November-18 Asset Disposition	11/16/2018	KBD	390	1 appear before Judge Kim for hearing on motions to approve sale procedures and file liquidation plan (1.0)	\$	390.00
November-18 Asset Disposition	11/16/2018	KBD	390	0.4 telephone conference with M. Rachlis and broker representatives regarding same (.4)	\$	156.00
November-18 Asset Disposition	11/16/2018	KBD	390	0.4 telepriorie conference with M. Rachilis and proker representatives regarding same (.4) 0.1 study correspondence from city official and Mirjanich regarding liquidation plan and request for meeting (.1)	\$ \$	39.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 60 of 157 PageID #:65093

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Ο	bjection
Lifty Bute	Keeper	Rate	Hours	Descripti on	Cost	ŭ	ojection
November-18 Asse	et Disposition	11/18/2018	KBD	390	0.3 Study revised liquidation plan and review correspondence from M. Rachlis regarding same.	\$	117.00
November-18 Asse		11/19/2018	KBD	390	0.4 Study and revise liquidation plan (.4)	\$	156.00
November-18 Asse		11/19/2018	KBD	390	0.1 study correspondence and revisions from E. Duff (.1).	\$	39.00
November-18 Asse		11/20/2018	KBD	390	0.2 Office conference with and study correspondence from N. Mirjanich and M. Rachlis regarding revised draft	\$	78.00
November-10 7330	t Disposition	11/20/2010	NDD	000	liquidation plan (.2)	Ψ	70.00
November-18 Asse	et Disposition	11/20/2018	KBD	390	0.1 exchange correspondence with real estate broker regarding inclusion of marketing costs within commission structure (.1).	\$	39.00
November-18 Asse	at Disposition	11/21/2018	KBD	390	0.1 study correspondence from E. Duff regarding revisions to liquidation plan (.1)	\$	39.00
November-18 Asse		11/21/2018	KBD	390	0.2 study liquidation plan (.2)	\$	78.00
November-18 Asse		11/26/2018	KBD	390	0.5 Study revised draft liquidation plan and telephone conference with N. Mirjanich regarding same (.5)	\$	195.00
November-18 Busi		11/1/2018	KBD	390	0.3 Study revised drait riquidation plan and telephone conference with N. Milipanion regarding same (.3) 0.1 study correspondence regarding potential property manager (.1)	\$	39.00
November-18 Busi		11/1/2018	KBD	390	0.2 study correspondence from M. Adler and A. Porter regarding reconciliation of insurance schedule information	\$	78.00
November-16 Busi	ness Operations	11/1/2010	KDD	390	(.2).	Φ	70.00
November-18 Busi	ness Operations	11/2/2018	KBD	390	(.2). 0.1 Study correspondence from asset manager regarding lender communication and property management (.1)	\$	39.00
November-18 Busi	ness Operations	11/9/2018	KBD	390	0.1 study correspondence from E. Duff and property managers regarding profit and loss reporting for lender properties (.1)	\$	39.00
November-18 Busi	ness Operations	11/16/2018	KBD	390	0.2 attention to payment of property insurance and communication with bank regarding wire transfer(.2)	\$	78.00
November-18 Busi		11/18/2018	KBD	390	O.3 Exchange correspondence with A. Porter and M. Rachlis regarding mortgage release issue [and study legal research regarding same] (.3)	\$	117.00
November-18 Busi	ness Operations	11/20/2018	KBD	390	0.2 study past property net operating income figures and exchange correspondence with asset manager regarding same (.2)	\$	78.00
November-18 Busin	ness Operations	11/20/2018	KBD	390	0.1 review mortgage company statement and exchange correspondence with E. Duff regarding same (.1)	\$	39.00
November-18 Busi	ness Operations	11/21/2018	KBD	390	0.1 study correspondence from property manager representative regarding tax issues of properties (.1)	\$	39.00
November-18 Busi		11/26/2018	KBD	390	0.3 exchange correspondence with K. Pritchard and bank representative and further telephone conference with	\$	117.00
	·				bank representative regarding payment of property insurance (.3)		
November-18 Busi	ness Operations	11/30/2018	KBD	390	0.2 study correspondence to and telephone conference with bank representative regarding wire transfer for insurance payments (.2)	\$	78.00
November-18 Busi	ness Operations	11/30/2018	KBD	390	0.1 telephone conference with real estate firm representative regarding potential sales, property management, and construction services (.1)		39.00
November-18 Busi	·	11/30/2018	KBD	390	0.3 exchange correspondence with employee and A. Watychowicz regarding transactional records relating to loans (.3)	\$	117.00
Obje	ns Administration & ections	11/1/2018	KBD	390	0.1 exchange correspondence with M. Rachlis, E. Duff, and asset manager regarding same (.1).	\$	39.00
Obje	ns Administration & ections	11/29/2018	KBD	390	0.4 Office conference with M. Rachlis regarding distribution analysis and potential methodologies (.4)	\$	156.00
Obje	ns Administration & ections	11/29/2018	KBD	390	0.2 study correspondence from E. Duff regarding inquiries from lender's counsel regarding property manager financial reporting (.2)	\$	78.00
Obje	ns Administration & ections	11/29/2018	KBD	390	0.1 study motion for leave to file objections to liquidation plan (.1).	\$	39.00
Obje	ns Administration & ections	11/30/2018	KBD	390	0.1 study lender motion for leave to file objections to liquidation plan (.1)	\$	39.00
Obje	ns Administration & ections	11/30/2018	KBD	390	0.1 study correspondence from lender's counsel regarding property management information (.1).	\$	39.00
November-18 Asse		11/1/2018	NM	260	0.1 Correspond with A Watychowicz regarding disposition of properties identified by the real estate broker.	\$	26.00
November-18 Asse		11/5/2018	NM	260	3.8 Draft the liquidation plan.	\$	988.00
November-18 Asse		11/6/2018	NM	260	1.4 Draft and revise distribution plan and motion to file same under seal (1.4)	\$	364.00
November-18 Asse	et Disposition	11/7/2018	MR	390	0.6 Conferences regarding various issues regarding asset disposition and motions regarding same (.6)	\$	234.00
November-18 Asse	et Disposition	11/7/2018	NM	260	1.5 Draft and revise liquidation plan and motion to file same under seal (1.5)	\$	390.00
November-18 Asse	et Disposition	11/8/2018	AEP	390	0.8 Teleconference with receivership team and broker advisors regarding current strategy for tranching and selling properties and debt service issues.	\$	312.00
November-18 Asse	et Disposition	11/8/2018	MR	390	1.4 Participate in call with real estate broker on disposition related issues.	\$	546.00
November-18 Asse		11/8/2018	NM	260	1 draft and revise liquidation plan and motion to file same under seal and correspond with K. Duff regarding same (1.0)	\$	260.00
November-18 Asse	et Disposition	11/8/2018	NM	260	1.6 telephone conference with K. Duff, M. Rachlis, A Porter, and real estate broker regarding portfolio liquidation and updates to same (1.6)	\$	416.00
November-18 Asse	et Disposition	11/9/2018	MR	390	1 Work on liquidation plan related issues and motion on same (1.0)	\$	390.00
November-18 Asse		11/9/2018	NM	260	4.2 Draft and revise liquidation plan (4.2)	\$	1,092.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 61 of 157 PageID #:65094

Futus Bata		Ti 1/	Tools	Table	Today	O 1	
•	me eper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	O	ojection
Ne	eper	Rate	nours	on	Cost		
November-18 Asset Dispositio	n	11/9/2018	NM	260	0.2 correspond with K. Duff regarding same (.2)	\$	52.00
November-18 Asset Dispositio	n	11/11/2018	MR	390	1.3 Review and comment regarding issues and items for liquidation plan.	\$	507.00
November-18 Asset Dispositio	n	11/12/2018	MR	390	0.5 Attention to issues related to liquidation plan (.5)	\$	195.00
November-18 Asset Dispositio	n	11/12/2018	NM	260	5.5 Draft and revise motion for public sale and for in camera liquidation plan, draft and revise liquidation plan,	\$	1,430.00
					study comments from M. Rachlis and K. Duff on same and correspond with real estate broker, property		
					managers, E. Duff, and A. Watychowicz regarding same.		
November-18 Asset Dispositio	n	11/14/2018	AEP	390	2.4 Study and revise draft liquidation plan.	\$	936.00
November-18 Asset Dispositio	n	11/14/2018	ED	390	1.3 Review and comment on draft of Receiver's liquidation plan (1.3)	\$	507.00
November-18 Asset Dispositio	n	11/14/2018	ED	390	0.6 confer with counsel for Receiver regarding same (.6).	\$	234.00
November-18 Asset Dispositio	n	11/14/2018	NM	260	1.5 Study liquidation plan, study comments from E. Duff and A. Porter on same, and correspond with K. Duff on same.	\$	390.00
November-18 Asset Dispositio	n	11/15/2018	AW	140	0.1 Attention to financial reports from management company (.1)	\$	14.00
November-18 Asset Dispositio		11/15/2018	AW	140	0.2 download reports and share same with broker (.2).	\$	28.00
November-18 Asset Dispositio		11/15/2018	MR	390	1.4 Conferences on liquidation plan.	\$	546.00
November-18 Asset Dispositio	n	11/15/2018	NM	260	2.3 Revise liquidation plan and proposed redactions for same (2.3)	\$	598.00
November-18 Asset Dispositio	n	11/15/2018	NM	260	1.1 correspond with M. Rachlis and K. Duff regarding same (1.1)	\$	286.00
November-18 Asset Dispositio	n	11/15/2018	NM	260	0.2 study correspondence and offering memoranda from broker (.2).	\$	52.00
November-18 Asset Dispositio		11/16/2018	AW	140	0.2 update electronic records for broker (.2)	\$	28.00
November-18 Asset Dispositio	n	11/16/2018	MR	390	0.8 conferences regarding liquidation plan (.8).	\$	312.00
November-18 Asset Dispositio	n	11/16/2018	NM	260	0.4 Revise liquidation plan (.4)	\$	104.00
November-18 Asset Dispositio	n	11/16/2018	NM	260	0.9 telephone conference with real estate broker, M. Rachlis, and K. Duff regarding same and further correspond	\$	234.00
November-18 Asset Dispositio	n	11/16/2018	NM	260	with M. Rachlis and K. Duff regarding same and revisions to liquidation plan (.9) 0.4 correspond with M. Rachlis and E. Duff regarding same and revisions to liquidation plan following Court order	\$	104.00
•					and directive (.4).	·	
November-18 Asset Dispositio	n	11/17/2018	MR	390	0.7 Further review and work on liquidation plan.	\$	273.00
November-18 Asset Dispositio	n	11/19/2018	AW	140	0.1 Compile purchase offers for K. Duff.	\$	14.00
November-18 Asset Dispositio	n	11/19/2018	MR	390	1.7 Meetings on upcoming assignments and related issues on motions and other aspects of recovery and disposition related items.	\$	663.00
November-18 Asset Dispositio	n	11/19/2018	NM	260	0.3 Study comments on liquidation plan and correspond with K. Duff regarding same.	\$	78.00
November-18 Asset Dispositio		11/20/2018	MR	390	0.4 Comment and follow up on liquidation plan related issues.	\$	156.00
November-18 Asset Dispositio	n	11/20/2018	NM	260	2 Revise liquidation plan with comments from E. Duff and K. Duff and correspond with same and with M. Rachlis on same (2.0)	\$	520.00
November-18 Asset Dispositio	n	11/21/2018	ED	390	0.6 Review draft of Receiver's Liquidation Plan (.6)	\$	234.00
November-18 Asset Dispositio		11/21/2018	ED	390	0.3 confer with N. Mirjanich regarding same (.3).	\$	117.00
November-18 Asset Dispositio		11/21/2018	KMP	140	0.2 Review draft liquidation plan and communication with N. Mirjanich regarding receivership estate funds (.2)	\$	28.00
November-18 Asset Dispositio	n	11/21/2018	KMP	140	0.1 conferences with A. Watychowicz regarding anticipated filing of same (.1).	\$	14.00
November-18 Asset Dispositio		11/21/2018	MR	390	0.4 Further review and comment on liquidation plan issues.	\$	156.00
November-18 Asset Dispositio		11/21/2018	NM	260	0.8 Revise liquidation plan and correspond with E. Duff and K. Duff regarding same (.8)	\$	208.00
November-18 Asset Dispositio		11/26/2018	AW	140	0.1 Communicate with M. Rachlis and N. Mirjanich regarding liquidation plan (.1)	\$	14.00
November-18 Asset Dispositio		11/26/2018	AW	140	0.3 proofread liquidation plan (.3)	\$	42.00
November-18 Asset Dispositio		11/26/2018	AW	140	0.1 request revisions from K. Pritchard (.1)	\$	14.00
November-18 Asset Dispositio		11/26/2018	AW	140	0.5 finalize liquidation plan, apply requested redactions, and prepare liquidation plan with Highly Confidential designation (.5)	\$	70.00
November-18 Asset Dispositio	n	11/26/2018	AW	140	0.2 file redacted liquidation plan (.2).	\$	28.00
November-18 Asset Dispositio		11/26/2018	MR	390	0.8 Conferences and follow up regarding issues on liquidation plan (.8)	\$	312.00
November-18 Asset Dispositio		11/27/2018	KMP	140	0.2 Conferences with N. Mirjanich regarding placement of advertisements for public sale of certain properties and	\$	28.00
Treveniser To Aleger Biopecials	••				make arrangements for payment in connection with same.	Ψ.	20.00
November-18 Asset Dispositio	n	11/27/2018	NM	260	0.2 Draft cover letter for Judge Lee for unredacted liquidation plan and correspond with A. Watychowicz regarding same (.2)	\$	52.00
November-18 Asset Dispositio	n	11/27/2018	NM	260	0.1 correspond with E. Duff regarding service of unredacted plan on lenders' counsel (.1)	\$	26.00
November-18 Asset Dispositio		11/29/2018	MR	390	0.3 Attention to motions challenging liquidation plan (.3)	\$	117.00
November-18 Asset Dispositio		11/30/2018	AEP	390	Teleconference with receivership brokers regarding recently received offers to purchase portfolio and other pressing issues.	\$	156.00
November-18 Business Opera	tions	11/2/2018	AEP	390	0.2 Respond to insurance agent inquiries regarding properties contained in EquityBuild portfolio.	\$	78.00
November-18 Business Opera		11/2/2018	ED	390	0.6 review financial reporting information and follow up on requests (.6).	\$	234.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 62 of 157 PageID #:65095

Entry Date Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
Keeper	Rate	Hours	Descripti on	Cost	U	ojection
November-18 Business Operations	11/2/2018	MBA	390	0.2 Email exchanges with insurance broker and A Porter relating to reconciling discrepancies between schedules of insured premises under CGL and Property policies, and with schedule of Receivership properties. Business Operations	\$	78.00
November-18 Business Operations	11/5/2018	KMP	140	Neview payment schedule for premium finance agreement and conference with K. Duff regarding same. Business Operations	\$	28.00
November-18 Business Operations	11/14/2018	NM	260	1.5 Study and respond to outstanding emails, including those relating to motions and briefs filed today, objections to redaction and sale motion up tomorrow, marketing materials from real estate broker, and outstanding City litigation (1.5):	\$	390.00
November-18 Business Operations	11/16/2018	AEP	390	Reconcile discrepancies between master list of receivership properties with schedule of properties being insured (.4)	\$	156.00
November-18 Business Operations	11/16/2018	MBA	390	0.2 Email exchange with insurance broker regarding expiring CGL (.2)	\$	78.00
November-18 Business Operations	11/16/2018	MBA	390	0.3 compare own copies of insurance schedules and of receivership property portfolios to try to address questions from broker (.3)	\$	117.00
November-18 Business Operations	11/16/2018	MBA	390	0.6 email exchanges with A. Porter seeking confirmation as to same as well as general project to identify and reconcile any discrepancies on receivership records of portfolio and insurance schedules (.6).	\$	234.00
November-18 Business Operations	11/16/2018	MBA	390	0.2 follow-up phone call with him regarding same, including identifying nature of premises insured (.2)	\$	78.00
November-18 Business Operations	11/20/2018	AEP	390	2.1 Research into current status of unpaid property tax bills and anticipated first installment 2018 liability.	\$	819.00
November-18 Business Operations	11/26/2018	KMP	140	0.2 Prepare wire transfer request form for insurance installment payment and communicate with K. Duff regarding same (.2)	\$	28.00
November-18 Business Operations	11/27/2018	AW	140	0.1 attention to email exchanges between K. Duff and EquityBuild employee regarding same (.1).	\$	14.00
November-18 Claims Administration & Objections	11/13/2018	NM	260	correspond with A Watychowicz and K. Pritchard regarding claims process and logistics for administering same (1.0)	\$	260.00
November-18 Claims Administration & Objections	11/14/2018	AW	140	0.1 attention to email regarding same (.1)	\$	14.00
November-18 Claims Administration & Objections	11/29/2018	AW	140	0.1 attention to motion filed by institutional lenders opposing liquidation plan (.1)	\$	14.00
November-18 Claims Administration & Objections	11/29/2018	AW	140	0.1 email counsel regarding same (.1).	\$	14.00
November-18 Claims Administration & Objections	11/30/2018	AW	140	0.1 attention to creditor's motion for leave to file response to Receiver's liquidation Plan (.1).	\$	14.00
December-18 Asset Disposition	12/3/2018	KBD	390	0.2; telephone conference and exchange correspondence with broker regarding same and commission disclosure (.2).	\$	78.00
December-18 Asset Disposition	12/4/2018	KBD	390	0.1 Study court order regarding liquidation plan approval and objections.	\$	39.00
December-18 Asset Disposition	12/10/2018	KBD	390	0.2 Study correspondence from and telephone conference with asset manage firm representatives regarding sale priority, property repairs, and cost benefit analysis (.2)	\$	78.00
December-18 Asset Disposition	12/11/2018	KBD	390	0.1 Exchange correspondence with real estate broker regarding marketing and market information.	\$	39.00
December-18 Asset Disposition	12/26/2018	KBD	390	Study correspondence from A. Porter regarding documentation needed for conveying title at real estate closings (.1)	\$	39.00
December-18 Business Operations	12/5/2018	KBD	390	0.3 telephone conference with real estate broker and N. Mirjanich regarding same, payment of real estate taxes, purchase and sale agreement, evaluation of market and economic factors, and portfolio analysis (.3)	\$	117.00
December-18 Business Operations	12/17/2018	KBD	390	0.1 study correspondence from insurance broker regarding insurance payments (.1)	\$	39.00
December-18 Business Operations	12/17/2018	KBD	390	0.1 telephone conference with bank representative regarding wire transfer for insurance payment (.1)	\$	39.00
December-16 Business Operations	12/17/2018	KBD	390	0.1 telephone conference with bank representative regarding wire transfer for property expenses (.1)	\$	39.00
December-18 Business Operations	12/28/2018	KBD	390	Study correspondence from M. Adler and insurance broker regarding insurance records and covered properties (.2)	\$	78.00
December-18 Asset Disposition	12/3/2018	NM	260	0.2 Study correspondence from real estate broker and attachments to same in advance of office conference (.2)	\$	52.00
December-18 Asset Disposition	12/3/2018	NM	260	0.6 office conference with K. Duff, M. Rachlis, and A. Porter regarding liquidation of properties and future plans for same (.6).	\$	156.00
December-18 Asset Disposition	12/5/2018	AEP	390	0.1 Read e-mail regarding interest of outside investor in purchasing portfolio and reply thereto (.1)	\$	39.00
December-18 Asset Disposition	12/5/2018	AEP	390	7.4 review and analyze contract submitted on behalf of proposed purchaser of entire portfolio and prepare e-mail response thereto (.4).	\$	156.00
December-18 Asset Disposition	12/5/2018	ED	390	0.4 Confer with Receiver and email to property advisor regarding confirmation of mortgages encumbering various properties.	\$	156.00
December-18 Asset Disposition	12/7/2018	AEP	390	 Continue reading, editing, revising, and customizing purchase and sale agreement and making notes of unresolved issues. 	\$	1,053.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 63 of 157 PageID #:65096

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	C	bjection
Lift y Date	Keeper	Rate	Hours	Descripti	Cost	J	bjection
December-18 Bus	siness Operations	12/17/2018	KMP	on 140	0.1 Communication with insurance broker to confirm amount of payment due on premium finance installment loan (.1)	\$	14.00
December-18 Bus	siness Operations	12/17/2018	KMP	140	0.1 prepare wire transfer request form for same for execution by K. Duff (.1)	\$	14.00
December-18 Bus		12/17/2018	KMP	140	0.1 communications with bank representative regarding processing wire transfer request (.1)	\$	14.00
December-18 Bus		12/17/2018	MR	390	0.2 conferences with K. Duff regarding same (.2)	\$	78.00
December-18 Bus	siness Operations	12/28/2018	KMP	140	0.1 Attention to communications with insurance broker regarding discrepancies relating to EB ownership of listed insured properties.	\$	14.00
December-18 Bus	·	12/28/2018	MBA	390	0.4 draft detailed follow-up email to broker regarding other discrepancies between insurance schedules of properties and our records of Receivership portfolio (.4).	\$	156.00
	ims Administration & jections	12/10/2018	ED	390	2.8 review documents regarding cash inflow and outflow relating to mortgaged properties (2.8)	\$	1,092.00
	ims Administration & jections	12/12/2018	MR	390	0.4 Attention to requests to meet with property managers and follow up on same with K. Duff and related issues (.4)	\$	156.00
January-19 Ass	set Disposition	1/3/2019	KBD	390	2.2 telephone conference with real estate firm representatives, M. Rachlis, A. Porter, and N. Mirjanich regarding portfolio analysis, properties to list for sale, and various related issues (2.2)	\$	858.00
January-19 Ass	set Disposition	1/24/2019	KBD	390	2.8 Analysis and planning with M. Rachlis, N. Mirjanich, and E. Duff regarding process for approval and use of real estate sales proceeds, potential distribution issues (2.8)	\$	1,092.00
January-19 Ass	set Disposition	1/24/2019	KBD	390	0.1 study correspondence from N. Mirjanich regarding same (.1).	\$	39.00
January-19 Bus	siness Operations	1/18/2019	KBD	390	0.1 review correspondence from insurance broker regarding amended to policies (.1)	\$	39.00
January-19 Bu	siness Operations	1/29/2019	KBD	390	0.2 study insurance schedule by property and exchange correspondence with insurance broker regarding same (.2)	\$	78.00
	siness Operations	1/31/2019	KBD	390	0.1 study correspondence from insurance broker regarding insurance premiums (.1)	\$	39.00
	ims Administration & jections	1/3/2019	KBD	390	0.1 review correspondence from N. Mirjanich, A. Porter, and E. Duff regarding same (.1).	\$	39.00
January-19 Ass		1/3/2019	MR	390	0.4 Follow up on email regarding sales and conferences regarding same.	\$	156.00
January-19 Ass		1/3/2019	NM	260	0.5 Study document provided by real estate broker in advance of telephone conference with same (.5)	\$	130.00
January-19 Ass		1/3/2019	NM	260	0.4 telephone conference with real estate broker and K. Duff, M. Rachlis, and A. Porter regarding disposition of properties (.4).	\$	104.00
January-19 Ass		1/24/2019	ED	390	1.8 meeting with Receiver, M. Rachlis, and N. Mirjanich to discuss handling and application of proceeds of sale of properties (1.8).		702.00
January-19 Ass		1/24/2019	MR	390	3.5 Attention to various issues on property disposition and meetings regarding same.	\$	1,365.00
·	siness Operations	1/15/2019	KMP	140	0.2 Review online bank records for Receivership Estate account, and prepare wire transfer request for payment of property insurance premium (.2)		28.00
	siness Operations	1/15/2019	KMP	140	0.2 conference with K. Duff and communications with bank representative regarding same (.2).	\$	28.00
•	siness Operations	1/30/2019	ED	390	0.2 review information regarding insurance coverage for mortgaged properties and email to M. Rachlis regarding same (.2)	\$	78.00
•	siness Operations	2/4/2019	KBD	390	0.1 telephone conference and exchange correspondence with bank representative regarding wire transfer for insurance payment (.1).	\$	39.00
	siness Operations	2/19/2019	KBD	390	0.2 Review property insurance issues with E. Duff (.2)	\$	78.00
•	siness Operations	2/19/2019	KBD	390	0.2 exchange correspondence with D. Weinberg regarding real estate taxes and office conference with M. Rachlis regarding same (.2)		78.00
	siness Operations	2/20/2019	KBD	390	0.4 analysis of real estate taxes, payment options, and timing and office conferences with E. Duff and M. Rachlis regarding same (.4)	\$	156.00
•	siness Operations	2/25/2019	KBD	390	0.3 exchange correspondence with K. Pritchard and insurance broker regarding policy term information and renewal (.3)	\$	117.00
February-19 Bus	siness Operations	2/25/2019	KBD	390	0.2 Attention to bank records and available funds, insurance costs, and accounting for property related expenses with K. Pritchard (.2)	\$	78.00
February-19 Bus	siness Operations	2/26/2019	KBD	390	0.4 telephone conferences and exchange correspondence with property managers regarding financial reporting, property reserves, and real estate taxes (.4)	\$	156.00
	siness Operations	2/27/2019	KBD	390	0.3 study various correspondence from M. Rachlis, E. Duff, and K. Pritchard regarding real estate tax planning (.3)		117.00
·	siness Operations	2/28/2019	KBD	390	0.1 study correspondence from insurance broker and K. Pritchard regarding premium finance installment payments (.1).	\$	39.00
Ob	ims Administration & jections	2/19/2019	KBD	390	0.1 confer with E. Duff regarding same and property manager communications (.1)	\$	39.00
February-19 Ass		2/28/2019	JR	140	0.5 Telephone communication regarding payment of delinquent taxes (.5)	\$	70.00
February-19 Ass		2/28/2019	JR	140	2.5 created an excel spreadsheet regarding 2017 and 2018 taxes, proofread and finalize (2.5)	\$	350.00
February-19 Bus	siness Operations	2/1/2019	KMP	140	0.1 conference with K. Duff regarding upcoming payment for property insurance (.1).	\$	14.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 64 of 157 PageID #:65097

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Ol	jection
	Keeper	Rate	Hours	Descripti on	Cost		
February-19 Bus	siness Operations	2/4/2019	KMP	140	0.2 Prepare wire transfer request form for insurance premium payment and communications with bank regarding processing of wire transfer.	\$	28.00
February-19 Bus	siness Operations	2/11/2019	AW	140	0.1 attention to email regarding online vendor (.1)	\$	14.00
February-19 Bus	siness Operations	2/19/2019	ED	390	0.3 review insurance coverage for properties portfolio and emails to broker, K. Duff and K. Pritchard regarding same (.3)	\$	117.00
February-19 Bus	siness Operations	2/19/2019	ED	390	0.1 discussion with K. Duff for property taxes and insurance (.1).	\$	39.00
February-19 Bus	siness Operations	2/20/2019	ED	390	0.9 prepare report for K. Duff regarding real estate tax liabilities (.9)	\$	351.00
February-19 Bus	siness Operations	2/20/2019	ED	390	0.4 confer with J. Rak (.4)	\$	156.00
February-19 Bus	siness Operations	2/20/2019	ED	390	0.2 property managers (.2) regarding same	\$	78.00
February-19 Bus	siness Operations	2/25/2019	AW	140	0.3 Revise and assemble income statement breakdown provided by E. Duff.	\$	42.00
February-19 Bus	siness Operations	2/25/2019	KMP	140	0.1 communication with accountant to forward record of insurance expenses identified by property (.1)	\$	14.00
February-19 Bus	siness Operations	2/25/2019	KMP	140	0.2 communications with insurance broker regarding property liability insurance expiration dates and related expiration of premium finance agreement, and discuss same with K. Duff (.2).	\$	28.00
February-19 Bus	siness Operations	2/26/2019	ED	390	0.3 calls to property manager and asset manager regarding financial information related to tax analysis (.3)	\$	117.00
February-19 Bus	siness Operations	2/26/2019	JR	140	1.1 Spreadsheet relating to insurance.	\$	154.00
February-19 Bus	siness Operations	2/28/2019	KMP	140	0.2 Communications with K. Duff and insurance broker regarding terms of premium finance installment agreement on property insurance and issues relating to payments and payoff (.2)	\$	28.00
March-19 Bus	siness Operations	3/1/2019	KBD	390	0.1 study correspondence from insurance broker regarding insurance coverage, finance agreement, and payment history (.1)	\$	39.00
March-19 Bus	siness Operations	3/6/2019	KBD	390	0.2 study correspondence from E. Duff and insurance broker regarding insurance premium payments (.2).	\$	78.00
March-19 Bus	siness Operations	3/14/2019	KBD	390	0.1 exchange correspondence with K. Pritchard regarding efforts for insurance renewal (.1).	\$	39.00
March-19 Bus	siness Operations	3/15/2019	KBD	390	0.1 review correspondence from insurance broker and E. Duff regarding premium allocation (.1)	\$	39.00
March-19 Bus	siness Operations	3/28/2019	KBD	390	0.2 study correspondence from insurance broker regarding policy renewal information and estimate costs (.2)	\$	78.00
March-19 Ass	et Disposition	3/6/2019	JR	140	0.5 telephone communication with the Cook County Treasurer's office to confirm property balances (.5).	\$	70.00
March-19 Ass		3/6/2019	KMP	140	0.2 Communications with insurance broker and E. Duff regarding breakdown of premium payments, finance charges and fines on a per-property basis in connection with sale of properties.	\$	28.00
March-19 Ass	set Disposition	3/7/2019	JR	140	3.2 Update EquityBuild portfolio spreadsheet with updated real estate tax balances which include accrued interest from March.	\$	448.00
March-19 Ass	set Disposition	3/27/2019	JR	140	0.2 continue update spreadsheet of outstanding real estate taxes for K. Duff (.2).	\$	28.00
March-19 Ass		3/28/2019	AEP	390	0.5 conference call with receivership broker regarding change in disposition strategy (.5).	\$	195.00
March-19 Ass		3/29/2019	JR	140	0.7 Completed real estate tax balance excel spreadsheet (.7)	\$	98.00
March-19 Ass		3/29/2019	JR	140	0.2 ; exchange correspondence with K. Duff regarding same (.2).	\$	28.00
	siness Operations	3/1/2019	ED	390	0.2 review email from lender's counsel regarding proposal for payment of real estate taxes and confer with J. Rak and K. Duff regarding same, and regarding payment of property tax balance from available refund (.2).	\$	78.00
March-19 Bus	siness Operations	3/7/2019	NM	260	0.1 Study email correspondence relating to tax filing information and a property in the EquityBuild account (.1)	\$	26.00
March-19 Bus	siness Operations	3/8/2019	NM	260	0.2 correspond with E. Duff regarding financial reporting spreadsheets and hearings set before Judge Kim (.2).	\$	52.00
March-10 Rus	siness Operations	3/11/2019	ED	390	0.3 confer with J. Rak regarding updated figures for outstanding real estate taxes by property (.3)	\$	117.00
	siness Operations	3/11/2019	ED	390	1.1 prepare and send information to K. Duff analyzing potential approaches for optimizing timing of payments of real estate taxes (1.1)	\$	429.00
March-19 Rus	siness Operations	3/11/2019	ED	390	0.1 confer with K. Duff regarding same (.1)	\$	39.00
	siness Operations	3/11/2019	ED	390	Calls and email correspondence with insurance broker regarding sources of payments received for premiums following appointment of Receiver (.3)	\$	117.00
March-19 Rus	siness Operations	3/22/2019	ED	390	0.3 review of information regarding sources for payment of real estate taxes (.3)	\$	117.00
	siness Operations	3/25/2019	AEP	390	Review property insurance regime, confirm EquityBuild status as named insured, and provide notice of claim pursuant to policy provisions.	\$	156.00
March-19 Bus	siness Operations	3/27/2019	KMP	140	Communications with K. Duff and insurance broker regarding status of property insurance marketing and anticipated initial payments.	\$	28.00
March-19 Bus	siness Operations	3/28/2019	KMP	140	O.2 Communications with N. Mirjanich and insurance broker regarding status of property insurance marketing and anticipated initial payments.	\$	28.00
March-19 Rus	siness Operations	3/31/2019	ED	390	0.2 Calls with K. Duff to discuss financing options and expenses coming due (.2)	\$	78.00
	siness Operations	3/31/2019	ED	390	0.4 conference calls with property advisor and K. Duff regarding same (.4)	\$	156.00
	set Disposition	4/3/2019	KBD	390	0.2 Telephone conference with asset manager regarding revisions to portfolio summary and priority of property sales, analysis of cost benefit of sale timing and potential improvement, and balancing costs against timing for	\$	78.00
					all remaining properties (.2)		

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 65 of 157 PageID #:65098

Entry Date Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
Entry Date Time Keeper	Rate	Hours	Descripti	Cost Assessment Category	U	ojection
			on			
April-19 Asset Disposition	4/3/2019	KBD	390	0.5 analysis of same (.5)	\$	195.00
April-19 Business Operations	4/1/2019	KBD	390	0.3 analysis of unpaid real estate taxes and exchange correspondence with J. Rak regarding same (.3)	\$	117.00
April-19 Business Operations	4/1/2019	KBD	390	1.1 analysis of receivership funds, property related expenses, and planning and draft correspondence to E. Duff regarding same (1.1).	\$	429.00
April-19 Business Operations	4/3/2019	KBD	390	o.2 study updated spreadsheet regarding outstanding real estate taxes (.2)	\$	78.00
April-19 Business Operations	4/5/2019	KBD	390	0.3 Exchange correspondence with asset manager and J. Rak regarding analysis of real estate taxes (.3)	\$	117.00
April 10 Business Operations	4/5/2019	KBD	390	0.3 analysis of sources and uses (.3).	\$ \$	117.00
April-19 Business Operations April-19 Business Operations	4/8/2019 4/8/2019	KBD KBD	390 390	0.2 Study additional information from J. Rak regarding real estate taxes (.2) 0.5 draft correspondence to A. Porter, E. Duff, J. Rak, and N. Mirjanich regarding financing loan, filing of motion,	\$	78.00 195.00
·				payment of taxes, and hearing before Judge Lee (.5).		
April-19 Business Operations	4/9/2019	KBD	390	0.1 Exchange correspondence with insurance broker regarding renewal of coverage (.1)	\$	39.00
April-19 Business Operations	4/11/2019	KBD	390	0.5 analyze cash position of properties (.5)	\$	195.00
April-19 Business Operations	4/12/2019	KBD	390	0.1 study correspondence from insurance broker regarding insurance renewal (.1)	\$	39.00
April 10 Business Operations	4/18/2019	KBD KBD	390	4.8 Analyze portfolio expenses at length and work through same with E. Duff (4.8)	\$ \$	1,872.00
April-19 Business Operations April-19 Business Operations	4/18/2019 4/23/2019	KBD	390 390	0.7 analysis and development of options associated with real estate portfolio (.7)0.2 study real estate tax information from J. Rak (.2)	\$ \$	273.00 78.00
April-19 Business Operations April-19 Business Operations	4/24/2019	KBD	390	0.2 study real estate tax miormation from 3. Rak (.2) 0.2 draft correspondence to insurance broker regarding update on effort to obtain replacement insurance	φ \$	78.00
				coverage and cost relating to same (.2)	•	
April-19 Business Operations	4/25/2019	KBD	390	0.1 Office conference with E. Duff regarding communications with insurance broker (.1)	\$	39.00
April-19 Business Operations	4/29/2019	KBD	390	0.4 exchange correspondence with insurance broker and office conference with E. Duff regarding renewal or replacement of general liability, umbrella, and property insurance policies (.4)	\$	156.00
April-19 Asset Disposition	4/8/2019	AEP	390	0.2 read e-mails from K. Duff and M. Rachlis regarding sequencing of closings in accordance with cash needs and respond thereto (.2)	\$	78.00
April-19 Business Operations	4/3/2019	JR	140	1.7 Finalized and emailed updated delinquent real estate taxes for 2017 and 2018 per K. Duff.	\$	238.00
April-19 Business Operations	4/11/2019	NM	260	0.2 Study correspondence in EquityBuild email account relating to properties and transfers to property managers (.2)	\$	52.00
April-19 Business Operations	4/12/2019	KMP	140	0.1 Attention to communication from insurance broker requesting endorsement as agents of record (.1)	\$	14.00
April-19 Business Operations	4/12/2019	KMP	140	0.1 prepare email communication to insurance broker forwarding executed copy of same (.1).	\$	14.00
April-19 Business Operations	4/17/2019	ED	390	0.1 Call with asset manager regarding financial analysis of properties (.1)	\$	39.00
April-19 Business Operations	4/17/2019	JR	140	0.2 exchange correspondence with E. Duff regarding same (.2).	\$	28.00
April-19 Business Operations	4/18/2019	ED	390	1.2 confer with K. Duff regarding sources of funds to address expenses pending sale of properties (1.2)	\$	468.00
April-19 Business Operations	4/18/2019	ED	390	0.2 calls with A. Porter (.2)	\$	78.00
April-19 Business Operations	4/18/2019	ED	390	0.2 asset manager (.2) regarding same.	\$	78.00
April-19 Business Operations	4/25/2019	NM	260	0.1 exchange correspondence with City regarding meeting with water department (.1).	\$	26.00
May-19 Business Operations	5/16/2019	KBD	390	0.1 study correspondence and analysis from E. Duff regarding property account balances and payment of real estate taxes (.1)	\$	39.00
May-19 Asset Disposition	5/3/2019	AEP	390	0.3 Prepare with J. Rak and N. Mirjanich for meeting with Chicago Water Department (.3)	\$	117.00
May-19 Asset Disposition	5/3/2019	AEP	390	0.8 attend meeting with Chicago Water Department regarding payoff of outstanding water balances and full payment water certificate processing (.8)	\$	312.00
June-19 Business Operations	6/17/2019	KBD	390	0.1 evaluate return of insurance premium (.1).	\$	39.00
June-19 Business Operations	6/14/2019	ED	390	0.1 email correspondence with K. Duff regarding insurance issues (.1).	\$	39.00
July-19 Business Operations	7/8/2019	ED	390	0.1 email correspondence with insurance broker regarding policy documents (.1).	\$	39.00
October-19 Asset Disposition	10/28/2019	KBD	390	1.2 prepare for meeting with Court regarding sales planning and valuation issues with real estate broker, A. Porter, and M. Rachlis (1.2).	\$	468.00
November-19 Business Operations	11/6/2019	KMP	140	0.4 conferences with K. Duff and E. Duff regarding valuation and loss documents requested by insurer, and provide hard copies of requested documents to E. Duff for review (.4).	\$	56.00
November-19 Business Operations	11/19/2019	JR	140	0.7 exchange correspondence with E. Duff, A. Porter and K. Duff relating to same (.7).	\$	98.00
November-19 Business Operations	11/25/2019	KMP	140	0.2 revise draft statements of value and loss history relating to property insurance and conference with K. Duff regarding same (.2).	\$	28.00
November-19 Business Operations	11/26/2019	KMP	140	o.3 Finalize executed statements of value and loss for property insurance and communications with K. Duff regarding same.	\$	42.00
November-19 Business Operations	11/28/2019	JR	140	0.1; exchange correspondence to K. Duff regarding same (.1).	\$	14.00
December-19 Claims Administration & Objections	12/10/2019	NM	260	0.4 Correspond with potential vendors regarding claims data services and document repository for claims (.4)	\$	104.00
December-19 Claims Administration & Objections	12/10/2019	NM	260	0.5 telephone call with vendor regarding the same (.5)	\$	130.00
December-19 Claims Administration & Objections	12/11/2019	NM	260	0.6 telephone call with vendor regarding claims portal and setting up claimant library on property basis (.6)	\$	156.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 66 of 157 PageID #:65099

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	0	bjection
	Claims Administration &	12/12/2019	AW	<u>on</u> 140		\$	14.00
December-19	Objections Claims Administration &	12/12/2019	NM	260	timing. 0.2 confer with K. Duff regarding claims process (.2)	\$	52.00
December-19	Objections Claims Administration &	12/12/2019	NM	260	0.3 telephone conference with potential vendor regarding claims database (.3)	\$	78.00
December-19	Objections Claims Administration &	12/12/2019	NM	260	0.4 telephone conference with another potential vendor regarding claims database (.4)	\$	104.00
December-19	Objections Claims Administration &	12/12/2019	NM	260	0.4 summarize notes from the same and revise claims process checklist and plan of action to account for same	\$	104.00
December-19	Objections Claims Administration &	12/12/2019	NM	260	(.4). 0.2 confer with K. Duff regarding same (.2)	\$	52.00
December-19	Objections Claims Administration &	12/19/2019	NM	260	0.5 Telephone conference with potential vendor regarding claims database (.5)	\$	130.00
December-19	Objections Claims Administration &	12/31/2019	SZ	110	0.8 Review and organize claims submissions received.	\$	88.00
January-20	Objections Claims Administration &	1/8/2020	KBD	390	0.2 Confer with N. Mirjanich regarding document repository quotes and options (.2)	\$	78.00
January-20	Objections Claims Administration &	1/10/2020	KBD	390	1 Work on claims planning, logistics, timing and related issues with M. Rachlis and N. Mirjanich.	\$	390.00
January-20	Objections Claims Administration &	1/13/2020	KBD	390	1 Telephone conference with A. Porter, E. Duff, and N. Mirjanich regarding analysis of information relating to	\$	390.00
January-20	Objections Claims Administration &	1/13/2020	KBD	390	nature of claims and corresponding properties (1.0) 0.5 confer with and study correspondence from M. Rachlis and N. Mirjanich regarding same (.5)	\$	195.00
January-20	Objections Claims Administration &	1/14/2020	KBD	390	0.8 Work on issues relating to claims, security interests in properties, and various related issues with A. Porter, E.	\$	312.00
January-20	Objections Claims Administration &	1/14/2020	KBD	390	Duff, and N. Mirjanich (.8) 0.4 additional discussions with A. Porter regarding same (.4)	\$	156.00
January-20	Objections Claims Administration & Objections	1/16/2020	KBD	390	0.2 Confer with N. Mirjanich regarding claims review and preparation of report to court (.2)	\$	78.00
January-20	Claims Administration & Objections	1/21/2020	KBD	390	0.2 study revised list of claimants and receivership entities (.2).	\$	78.00
January-20	Claims Administration & Objections	1/23/2020	KBD	390	0.2 evaluate information from potential vendor regarding document repository services and confer with N. Mirjanich regarding same (.2)	\$	78.00
January-20	Claims Administration & Objections	1/23/2020	KBD	390	0.3 Study correspondence from lenders counsel regarding claims process and meeting (.3)	\$	117.00
January-20	Claims Administration & Objections	1/24/2020	KBD	390	1.3 work on claims process with N. Mirjanich (1.3)	\$	507.00
January-20	Claims Administration & Objections	1/24/2020	KBD	390	0.2 study correspondence from lender's counsel regarding claims process and exchange correspondence with M. Rachlis regarding same (.2).	\$	78.00
January-20	Claims Administration & Objections	1/25/2020	KBD	390	1.5 Work on claims process, and further study correspondence from lenders counsel regarding claims process (1.5)	\$	585.00
January-20	Claims Administration & Objections	1/26/2020	KBD	390	Study memorandum regarding claims process, development of procedures, document repository, sequence and timing, and various related issues (.4)	\$	156.00
January-20	Claims Administration & Objections	1/26/2020	KBD	390	0.8 work on claims process (.8).	\$	312.00
January-20	Claims Administration & Objections	1/27/2020	KBD	390	0.6 Work on claims process (.6)	\$	234.00
January-20	Claims Administration & Objections	1/27/2020	KBD	390	0.3 confer with N. Mirjanich regarding stages of process (.3)	\$	117.00
January-20	Claims Administration & Objections	1/27/2020	KBD	390	0.7 further work with M. Rachlis and N. Mirjanich regarding design of process (.7)	\$	273.00
January-20	Claims Administration & Objections	1/27/2020	KBD	390	2.8 work further on claims process with M. Rachlis regarding various additional aspects of claims process (2.8)	\$	1,092.00
January-20	Claims Administration & Objections	1/28/2020	KBD	390	1.2 Telephone conference with SEC and M. Rachlis (1.2)	\$	468.00
January-20	Claims Administration & Objections	1/28/2020	KBD	390	1.2 further work on claims process with M. Rachlis and N. Mirjanich (1.2)	\$	468.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 67 of 157 PageID #:65100

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
	Keeper	Rate	Hours	Descripti on	Cost		
•	ims Administration & ections	1/28/2020	KBD	390	1.9 participate in conference with various lenders' counsel and SEC (1.9)	\$	741.00
	ims Administration & ections	1/28/2020	KBD	390	0.1 review correspondence regarding potential document repository vendor costs (.1).	\$	39.00
January-20 Cla	ims Administration & ections	1/28/2020	KBD	390	0.2 confer with M. Rachlis and N. Mirjanich regarding same (.2)	\$	78.00
January-20 Cla	ims Administration & ections	1/29/2020	KBD	390	2.6 Work on claims process (2.6)	\$	1,014.00
January-20 Cla	ims Administration & ections	1/29/2020	KBD	390	0.1 exchange correspondence with lender's counsel regarding potential document repository vendor and follow-up regarding same (.1)	\$	39.00
January-20 Cla	ims Administration & ections	1/29/2020	KBD	390	3.1 study and revise draft report on claims and work on same with M. Rachlis (3.1)	\$	1,209.00
January-20 Cla	ims Administration & ections	1/29/2020	KBD	390	0.1 review correspondence regarding potential claimant (.1).	\$	39.00
January-20 Cla	ims Administration & ections	1/29/2020	KBD	390	0.2 study correspondence from claimant and draft correspondence to A. Porter regarding same (.2)	\$	78.00
January-20 Cla	ims Administration & ections	1/30/2020	KBD	390	1.7 Prepare for claims process meeting with Judge Lee and draft outline for presentation of information to participants (1.7)	\$	663.00
January-20 Cla	ims Administration &	1/30/2020	KBD	390	1 participate in meeting with Judge Lee and various counsel regarding claims process (1.0)	\$	390.00
January-20 Cla	ections ims Administration & ections	1/30/2020	KBD	390	0.1 confer with lenders' counsel regarding same (.1)	\$	39.00
January-20 Cla	ims Administration & ections	1/30/2020	KBD	390	0.4 study draft vendor contract and draft correspondence regarding same (.4).	\$	156.00
January-20 Ass		1/6/2020	JR	140	0.2 exchange correspondence with K. Duff and K. Pritchard regarding same (.2)	\$	28.00
January-20 Cla	ims Administration & ections	1/2/2020	SZ	110	Review and organize claims and amendments received under 12-31-19 deadline.	\$	220.00
January-20 Cla	ims Administration & ections	1/3/2020	MR	390	0.3 Attention to emails on status and attention to issues that need addressing on properties and claims.	\$	117.00
January-20 Cla	ims Administration & ections	1/8/2020	NM	260	1 tend to claims process matters in advance of January 30th status conference such as communicating with vendors and revising notes for claims process following same and correspond with K. Duff regarding same (1.0).	\$	260.00
	ims Administration & ections	1/9/2020	ED	390	1.8 Work with N. Mirjanich on process for reviewing and organizing claims content in preparation for priority analysis, outline of information to be recorded in initial document analysis timing, next steps, and resources for	\$	702.00
•	ims Administration & ections	1/9/2020	NM	260	project (1.8) 0.4 Prepare for meeting with E. Duff regarding claims process and study previous notes from same (.4)	\$	104.00
January-20 Cla	ims Administration & ections	1/9/2020	NM	260	0.2 exchange email correspondence relating to claims (.2)	\$	52.00
January-20 Cla	ims Administration & ections	1/9/2020	NM	260	1.8 work with E. Duff on claims process and first batch of properties for review of claims for same (1.8).	\$	468.00
January-20 Cla	ims Administration & ections	1/9/2020	SZ	110	4.3 Review and organize claims documentation received under 12-31-19 deadline.	\$	473.00
January-20 Cla	ims Administration & ections	1/10/2020	MR	390	1 Conference with K. Duff and N. Mirjanich on claims.	\$	390.00
January-20 Cla	ims Administration & ections	1/10/2020	NM	260	3.7 Revise spreadsheet with claimant information following December 31, 2019 bar date (3.7)	\$	962.00
January-20 Cla	ims Administration & ections	1/10/2020	NM	260	1 confer with K. Duff and M. Rachlis regarding claims process and selection of first batch of properties for review (1.0).	\$	260.00
January-20 Cla	ims Administration & ections	1/13/2020	AW	140		\$	28.00
January-20 Cla	ims Administration & ections	1/14/2020	NM	260	0.6 revise spreadsheet with claimant information following December 31, 2019 bar date (.6)	\$	156.00
January-20 Cla	ims Administration & ections	1/14/2020	NM	260	0.5 correspond with K. Duff, M. Rachlis, and A. Porter regarding claims submitted and previous filings with court (.5).	\$	130.00
January-20 Cla	ims Administration & ections	1/15/2020	AW	140	0.1 communicate with claim vendor regarding update to contact information for claimant (.1)	\$	14.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 68 of 157 PageID #:65101

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ol	jection
January-20 Claim	s Administration &	1/15/2020	NM	on 260	2 revise spreadsheet with claimant information following December 31, 2019 bar date (2.0).	\$	520.00
Objec Januarv-20 Claim	tions s Administration &	1/16/2020	NM	260	1.5 Revise spreadsheet with claimant information following December 31, 2019 bar date (1.5)	\$	390.00
Objec		1/20/2020	AW	140	0.1 Work with N. Mirjanich to access and analyze claim.	\$	14.00
Objec	tions	1/20/2020	NM	260	,	·	806.00
Objec					3.1 revise third status report Exhibit 1 to reflect recent claim submissions and amendments and analyze same and properties in order to determine batches of properties for claims review (3.1).		
January-20 Claim Objec	s Administration & tions	1/21/2020	AEP	390	0.5 Conference with N. Mirjanich regarding selection of properties encumbered by competing secured mortgages for presentation to court in preview of claims process.	\$	195.00
January-20 Claim Obiec	s Administration &	1/21/2020	NM	260	2.8 Revise third status report Exhibit 1 to reflect recent claim submissions and amendments and analyze same and properties in order to determine batches of properties for claims review (2.8)	\$	728.00
	s Administration &	1/21/2020	NM	260	0.4 and correspond with A. Porter (.4)	\$	104.00
,	s Administration &	1/21/2020	NM	260	0.2 K. Duff (.2) regarding same	\$	52.00
January-20 Claim	s Administration &	1/21/2020	NM	260	0.6 exchange correspond with vendors and professionals regarding depository for claims and database review	\$	156.00
•	s Administration &	1/22/2020	NM	260	platform (.6). 0.5 Exchange correspondence with claims vendors regarding document repository and create spreadsheet for one	\$	130.00
	s Administration &	1/23/2020	MR	390	vendor's analysis for same. 0.3; follow up regarding same with K. Duff (.3).	\$	117.00
Objec January-20 Claim	tions s Administration &	1/23/2020	NM	260	0.4 Correspond with vendor regarding document repository and database for EB document review (.4)	\$	104.00
Objec January-20 Claim	tions s Administration &	1/24/2020	MR	390	0.3 conferences with K. Duff regarding same (.3).	\$	117.00
Objec January-20 Claim	tions s Administration &	1/24/2020	NM	260	3.3 Study claims notes and outline process for review of same, including document repository.	\$	858.00
Objec January-20 Claim	tions s Administration &	1/25/2020	MR	390	0.9 Conference with K. Duff regarding various issues associated with claims process and upcoming meeting with	\$	351.00
Objec		1/26/2020	NM	260	lenders. 2.1 Study claims notes and outline process for review of same, including document repository, and research	\$	546.00
Objec		1/27/2020	MR	390	regarding same. 2.8 Meeting with K. Duff on variety of issues and strategies for claims process and upcoming meetings (2.8)	\$	1,092.00
Objec	tions					·	,
Objec		1/27/2020	MR	390	1.2 research and work to prepare for upcoming meeting with lenders (1.2).	\$	468.00
January-20 Claim Objec	s Administration & stions	1/27/2020	NM	260	0.3 Correspond with K. Duff regarding proposed claims process (.3)	\$	78.00
January-20 Claim Obiec	s Administration & tions	1/27/2020	NM	260	0.6 correspond with M. Rachlis regarding proposed claims process (.6)	\$	156.00
,	s Administration &	1/27/2020	NM	260	0.7 correspond with K. Duff and M. Rachlis regarding proposed claims process (.7)	\$	182.00
	s Administration &	1/27/2020	NM	260	0.3 telephone conference with vendor regarding claims organization and document repository (.3)	\$	78.00
January-20 Claim	s Administration &	1/27/2020	NM	260	0.2 follow-up email correspondence from same and summarize same into notes for M. Rachlis and K. Duff (.2).	\$	52.00
-	s Administration &	1/28/2020	MR	390	2.5 Continue research and prepare for upcoming meeting and hearing (2.5)	\$	975.00
•	s Administration &	1/28/2020	MR	390	2 attend meeting with lenders and follow up with K. Duff and N. Mirjanich (2.0).	\$	780.00
	s Administration &	1/28/2020	NM	260	0.2 Study proposal from vendor relating to transmittal of claimant documents (.2)	\$	52.00
	s Administration &	1/28/2020	NM	260	0.5 and telephone conference with same (.5)	\$	130.00
•	s Administration &	1/28/2020	NM	260	• • • • • • • • • • • • • • • • • • • •	\$	78.00
Objec January-20 Claim Objec	s Administration &	1/28/2020	NM	260	Judge Lee (.3) 1.2 correspond with M. Rachlis and K. Duff regarding claims process and prepare for meeting with institutional lenders regarding same (1.2)	\$	312.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 69 of 157 PageID #:65102

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
	Keeper	Rate	Hours	Descripti on	Cost		
	Claims Administration & Objections	1/28/2020	NM	260	2 confer with K. Duff, M. Rachlis, SEC, and institutional lender team regarding proposed claims process in advance of status conference with Judge Lee (2.0).	\$	520.00
	Claims Administration & Objections	1/29/2020	MR	390	5 Prepare draft summary report and research regarding same attempting to address concerns from meeting and other related issues, review comments from K. Duff and materials for upcoming conference (5.0)	\$	1,950.00
	Claims Administration & Objections	1/29/2020	MR	390	0.3 conferences with K. Duff regarding same and upcoming hearing (.3).	\$	117.00
January-20	Claims Administration & Objections	1/30/2020	MR	390	1.2 Prepare for upcoming hearing (1.2)	\$	468.00
January-20	Claims Administration &	1/30/2020	MR	390	1 attend hearing (1.0)	\$	390.00
January-20	Objections Claims Administration & Objections	1/30/2020	MR	390	0.3 conferences with K. Duff regarding same (.3)	\$	117.00
January-20	Claims Administration & Objections	1/30/2020	MR	390	0.2 follow up and review materials regarding claims and issues that need to be addressed (.2).	\$	78.00
	Claims Administration & Objections	1/31/2020	MR	390	0.2 Follow up on issues raised at hearing.	\$	78.00
February-20	Business Operations	2/4/2020	KBD	390	0.2 telephone conference with bank representative regarding same (.2)	\$	78.00
•	Claims Administration & Objections	2/3/2020	KBD	390	0.3 Confer with N. Mirjanich regarding claims process, procedure, discovery, timing, planning, and preparation of motion to approve.	\$	117.00
February-20	Claims Administration & Objections	2/6/2020	KBD	390	0.2 Work on electronic document repository issues with N. Mirjanich.	\$	78.00
•	Claims Administration & Objections	2/7/2020	KBD	390	0.2 study correspondence from A. Watychowicz and N. Mirjanich regarding data for claims vendor (.2).	\$	78.00
February-20	Claims Administration & Objections	2/12/2020	KBD	390	0.5 Analysis, legal research, and draft motion regarding claims process (.5)	\$	195.00
February-20	Claims Administration & Objections	2/12/2020	KBD	390	0.1 confer with N. Mirjanich regarding same (.1)	\$	39.00
February-20	Claims Administration & Objections	2/17/2020	KBD	390	0.3 Confer with M. Rachlis regarding claims process motion contents.	\$	117.00
February-20	Claims Administration & Objections	2/18/2020	KBD	390	1.8 Draft and revise claims process motion (1.8)	\$	702.00
February-20	Claims Administration & Objections	2/18/2020	KBD	390	0.2 confer with A. Watychowicz and N. Mirjanich regarding notice issues (.2)	\$	78.00
February-20	Claims Administration & Objections	2/19/2020	KBD	390	2.3 Study and revise draft claims process motion and confer with M. Rachlis regarding same (2.3)	\$	897.00
February-20	Claims Administration & Objections	2/19/2020	KBD	390	0.8 legal research regarding claims process (.8)	\$	312.00
February-20	Claims Administration & Objections	2/19/2020	KBD	390	0.1 confer with N. Mirjanich regarding claims relating to properties subject of claims motion (.1)	\$	39.00
February-20	Claims Administration & Objections	2/19/2020	KBD	390	1 telephone conference with document repository vendor regarding document database and costs (1.0)	\$	390.00
February-20	Claims Administration & Objections	2/19/2020	KBD	390	0.1 study correspondence from N. Mirjanich regarding claims vendor issue (.1).	\$	39.00
February-20	Claims Administration & Objections	2/20/2020	KBD	390	0.5 Confer with A. Porter regarding claims process motion.	\$	195.00
February-20	Claims Administration & Objections	2/23/2020	KBD	390	3.1 Draft and revise motion to approve dispute claims resolution process.	\$	1,209.00
February-20	Claims Administration & Objections	2/24/2020	KBD	390	1.5 Confer with M. Rachlis regarding sequence for properties in claims process and communications with lender's counsel (1.5)	\$	585.00
February-20	Claims Administration & Objections	2/24/2020	KBD	390	0.1 study claimant response to lender objections (.1)	\$	39.00
February-20	Claims Administration & Objections	2/24/2020	KBD	390	0.3 confer with M. Rachlis and N. Mirjanich regarding claims process motion (.3)	\$	117.00
February-20	Claims Administration & Objections	2/24/2020	KBD	390	0.2 confer with and study correspondence from A. Watychowicz regarding claimant information (.2).	\$	78.00
February-20	Claims Administration & Objections	2/25/2020	KBD	390	0.5 confer with M. Rachlis regarding claims process and document sharing (.5)	\$	195.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 70 of 157 PageID #:65103

Entry Date Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
Keeper	Rate	Hours	Descripti on	Cost		
February-20 Claims Administration & Objections	2/25/2020	KBD	390	0.8 revise protective order for claims and exchange correspondence with M. Rachlis regarding same (.8)	\$	312.00
February-20 Claims Administration & Objections	2/25/2020	KBD	390	0.7 Confer with and draft correspondence to M. Rachlis regarding approach to claims process and motion (.7)	\$	273.00
February-20 Claims Administration & Objections	2/25/2020	KBD	390	0.1 discuss vendor efforts to prepare claims forms and documentation for participants with N. Mirjanich (.1)	\$	39.00
February-20 Claims Administration & Objections	2/26/2020	KBD	390	0.3 Telephone conference with claimant regarding claims process, sale of properties, and various related issues (.3)	\$	117.00
February-20 Claims Administration & Objections	2/26/2020	KBD	390	0.3 exchange correspondence with M. Rachlis regarding communications with lenders' counsel regarding claims process (.3)	\$	117.00
February-20 Claims Administration & Objections	2/26/2020	KBD	390	5.8 study and revise draft motion to approve process for secured claims dispute resolution (5.8)	\$	2,262.00
February-20 Claims Administration & Objections	2/26/2020	KBD	390	0.4 exchange correspondence and confer with M. Rachlis and study related correspondence regarding same (.4)	\$	156.00
February-20 Claims Administration & Objections	2/27/2020	KBD	390	0.5 Study and revise multiple versions of claims dispute process motion (.5)	\$	195.00
February-20 Claims Administration & Objections	2/27/2020	KBD	390	0.5 study and revise draft protective order and confer with J. Wine regarding same (.5)	\$	195.00
February-20 Claims Administration & Objections	2/27/2020	KBD	390	0.1 study correspondence from lenders regarding claims process motion and exchange correspondence with M. Rachlis regarding same (.1).	\$	39.00
February-20 Claims Administration & Objections	2/28/2020	KBD	390	3.1 Study and revise claims process motion and confer with M. Rachlis and N. Mirjanich relating to same (3.1)	\$	1,209.00
February-20 Claims Administration & Objections	2/29/2020	KBD	390	0.2 Exchange correspondence regarding claims process motion, identification of claimants, and master claims spreadsheet.	\$	78.00
February-20 Asset Disposition	2/25/2020	JR	140	0.1 exchange correspondence with K. Duff regarding same (.1)	\$	14.00
February-20 Claims Administration & Objections		MR	390	0.3 Review and prepare materials regarding claims issues (.3)	\$	117.00
February-20 Claims Administration & Objections	2/3/2020	NM	260	0.5 Study and respond to correspondence relating to claims process and status conference on same (.5)	\$	130.00
February-20 Claims Administration & Objections	2/3/2020	NM	260	0.3 correspond with M. Rachlis regarding in chambers claims discussion and process (.3).	\$	78.00
February-20 Claims Administration & Objections	2/4/2020	NM	260	2.5 Study notes from claims status conference from K. Duff and M. Rachlis and revise claims to-do list and process notes to reflect same and next steps in claims process (2.5)	\$	650.00
February-20 Claims Administration & Objections	2/6/2020	NM	260	0.2 correspond with A. Watychowicz regarding claims process and vendor (.2).	\$	52.00
February-20 Claims Administration & Objections	2/7/2020	MR	390	0.3 Attention to issues regarding claims process and relations to various properties.	\$	117.00
February-20 Claims Administration & Objections	2/7/2020	NM	260	2 Revise claims process notes (2.0)	\$	520.00
February-20 Claims Administration & Objections	2/7/2020	NM	260	0.5 telephone call with potential vendor (.5).	\$	130.00
February-20 Claims Administration & Objections	2/10/2020	NM	260	0.8 Revise claims process notes (.8)	\$	208.00
February-20 Claims Administration & Objections	2/10/2020	NM	260	0.5 telephone call with institutional lenders regarding document repository for claims (.5)	\$	130.00
February-20 Claims Administration & Objections	2/10/2020	NM	260	0.5 correspond with K. Duff regarding same (.5).	\$	130.00
February-20 Claims Administration & Objections	2/13/2020	NM	260	0.2 correspond with claims vendors regarding document repository and database (.2).	\$	52.00
February-20 Claims Administration & Objections	2/14/2020	MR	390	0.2 Review email regarding claims process (.2)	\$	78.00
February-20 Claims Administration & Objections	2/14/2020	MR	390	0.1 follow up regarding same with N. Mirjanich (.1).	\$	39.00
February-20 Claims Administration & Objections	2/14/2020	NM	260	0.4 Correspond with vendors regarding document repository (.4)	\$	104.00
February-20 Claims Administration & Objections	2/14/2020	NM	260	0.2 attention to claims process (.2).	\$	52.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 71 of 157 PageID #:65104

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	0	bjection
February-20 Claims Administration &	2/17/2020	AW	<u>on</u> 140	0.2 Attention to emails from claimants and respond to same.	\$	28.00
Objections February-20 Claims Administration &	2/17/2020	MR	390	6.8 Further work on claims process motion and research regarding same.	\$	2,652.00
Objections February-20 Claims Administration &	2/17/2020	NM	260	0.4 Correspond with vendors regarding claims document repository (.4)	\$	104.00
Objections February-20 Claims Administration & Objections	2/17/2020	NM	260	0.1 correspond with A. Watychowicz regrading claimant responses (.1).	\$	26.00
February-20 Claims Administration & Objections	2/18/2020	AW	140	0.1 Attention to email regarding update on claims process and respond to same (.1)	\$	14.00
February-20 Claims Administration & Objections	2/18/2020	MR	390	0.3 Attention and follow up on claims motion and related issues (.3)	\$	117.00
February-20 Claims Administration & Objections	2/18/2020	NM	260	0.1 Correspond with A. Watychowicz regarding claims (.1)	\$	26.00
February-20 Claims Administration & Objections	2/18/2020	NM	260	0.2 correspond with claims vendors and receivership team regarding setting up demo for same (.2)	\$	52.00
February-20 Claims Administration & Objections	2/19/2020	AW	140	1.4 participate in video presentation of document repository service with receivership team (1.4).	\$	196.00
February-20 Claims Administration & Objections	2/19/2020	MR	390	0.2 follow up regarding document administration and management issues and presentation (.2).	\$	78.00
February-20 Claims Administration & Objections	2/19/2020	NM	260	0.5 Correspond with A. Watychowicz regarding claims process motion and claims against lender property (.5)	\$	130.00
February-20 Claims Administration & Objections	2/19/2020	NM	260	0.3 correspond with A. Watychowicz regarding claims and spreadsheet from vendor (.3)	\$	78.00
February-20 Claims Administration & Objections	2/19/2020	NM	260	0.1 correspond with A. Watychowicz (.1)	\$	26.00
February-20 Claims Administration & Objections	2/19/2020	NM	260	0.1 and K. Pritchard (.1) regarding vendors for claims	\$	26.00
February-20 Claims Administration & Objections	2/24/2020	MR	390	2.1 additional conferences and work on claims motion and follow up with N. Mirjanich (2.1)	\$	819.00
February-20 Claims Administration & Objections	2/24/2020	NM	260	1 Study and revise claims process motion and correspond with M. Rachlis regarding same (1.0)	\$	260.00
February-20 Claims Administration & Objections	2/24/2020	NM	260	0.3 correspond with K. Duff and M. Rachlis regarding claims process and sales (.3).	\$	78.00
February-20 Claims Administration & Objections	2/25/2020	AW	140	0.2 Meeting with N. Mirjanich regarding means of service of court documents on claimants (.2)	\$	28.00
February-20 Claims Administration & Objections	2/25/2020	AW	140	0.7 work with N. Mirjanich on spreadsheet to provide to claims vendor with amendments and claimant detail updates (.7).	\$	98.00
February-20 Claims Administration & Objections	2/25/2020	ED	390	1.1 review and comment on Motion for Approval of Process for Resolution of Claims Disputes (1.1)	\$	429.00
February-20 Claims Administration & Objections	2/25/2020	KMP	140	0.2 Review claims database regarding claims submitted via online platform and confer with N. Mirjanich regarding same.	\$	28.00
February-20 Claims Administration & Objections	2/25/2020	NM	260	3.8 Study and revise claims process motion.	\$	988.00
February-20 Claims Administration & Objections	2/26/2020	AW	140	0.6 Complete work with N. Mirjanich on spreadsheet to provide to claims vendor with amendments and claimant detail updates (.6)	\$	84.00
February-20 Claims Administration & Objections	2/26/2020	JRW	260	0.5 Review and revise draft protective order.	\$	130.00
February-20 Claims Administration & Objections	2/26/2020	KMP	140	0.3 Several communications regarding establishment of process for gathering claims records on claimant by claimant basis for analysis by accountant.	\$	42.00
February-20 Claims Administration & Objections	2/26/2020	MR	390	1.5 Further work on draft of motion regarding claims (1.5)	\$	585.00
February-20 Claims Administration & Objections	2/26/2020	MR	390	0.5 several conferences regarding same (.5).	\$	195.00
February-20 Claims Administration & Objections	2/26/2020	NM	260	0.9 Draft schedule for claims process motion (.9)	\$	234.00
February-20 Claims Administration & Objections	2/26/2020	NM	260	2.3 revise amendments and submissions list and correspond with A. Watychowicz and send to vendor (2.3)	\$	598.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 72 of 157 PageID #:65105

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	0	bjection
February-20	Claims Administration & Objections	2/26/2020	NM	on 260	0.1 correspond with vendor regarding FTP link with claimant data (.1)	\$	26.00
February-20	Claims Administration & Objections	2/26/2020	NM	260	0.2 study revised claims process motion (.2)	\$	52.00
February-20	Claims Administration & Objections	2/27/2020	AEP	390	3.2 Read, edit, and revise draft memorandum regarding proposal for claims process to be administered by federal court.	\$	1,248.00
February-20	Claims Administration & Objections	2/27/2020	AW	140	 Countil Compile email attachments received from claimants prior to claims process in claims vendor approved format and prepare transmittal of same. 	\$	798.00
February-20	Claims Administration & Objections	2/27/2020	ED	390	O.4 Continue review and revision of Motion for Approval of Process for Resolving Claims Disputes.	\$	156.00
February-20	Claims Administration & Objections	2/27/2020	JRW	260	1.4 Continued drafting and revision of protective order.	\$	364.00
February-20	Claims Administration & Objections	2/27/2020	MR	390	2.1 Work on drafts of motion for approval of claims process and protective order (2.1)	\$	819.00
February-20	Claims Administration & Objections	2/27/2020	MR	390	0.3 conferences with N. Mirjanich and K. Duff (.3)	\$	117.00
February-20	Claims Administration & Objections	2/27/2020	MR	390	0.2 conference with and review email on same (.2)	\$	78.00
February-20	Claims Administration & Objections	2/27/2020	NM	260	1.9 Study revised claims process motion and further revise same and exhibits to same (1.9)	\$	494.00
February-20	Claims Administration & Objections	2/27/2020	NM	260	0.5 draft proposed order for same (.5)	\$	130.00
February-20	Claims Administration & Objections	2/27/2020	NM	260	0.2 correspond with vendor regarding document uploads and claims repository (.2).	\$	52.00
February-20	Claims Administration & Objections	2/28/2020	AW	140	0.2 assist in preparation of protective order for purpose of motion related to claims (.2)	\$	28.00
February-20	Claims Administration & Objections	2/28/2020	AW	140	1.6 assist in finalizing, filing, and serving of claims motion (1.6)	\$	224.00
February-20	Claims Administration & Objections	2/28/2020	KMP	140	0.8 Review and revise draft motion for approval of claims process and confer with N. Mirjanich and A. Watychowicz regarding same.	\$	112.00
February-20	Claims Administration & Objections	2/28/2020	MR	390	4.3 Further work to review and revise motion and several conferences regarding same (4.3)	\$	1,677.00
February-20	Claims Administration & Objections	2/28/2020	NM	260	3.5 Revise claims process motion and exhibits and correspond with receiver's team regarding same (3.5)	\$	910.00
	Business Operations	3/19/2020	KBD	390	0.2 exchange correspondence regarding document repository vendor services (.2)	\$	78.00
	Business Operations Claims Administration &	3/30/2020 3/2/2020	KBD KBD	390 390	0.1 exchange correspondence with J. Wine regarding evaluation of document repository services (.1)0.1 exchange correspondence with M. Rachlis regarding draft protective order (.1).	\$ \$	39.00 39.00
March-20	Objections Claims Administration &	3/3/2020	KBD	390	0.3 Exchange various correspondence regarding and communications with claimants regarding claims process	\$	117.00
March-20	Objections Claims Administration &	3/4/2020	KBD	390	motion. 0.3 Draft correspondence to claimants regarding process, timing, and representation by counsel and exchange	\$	117.00
March-20	Objections Claims Administration &	3/4/2020	KBD	390	correspondence with M. Rachlis regarding same (.3) 0.4 study and revise draft responses to FAQ for communications with claimants (.4)	\$	156.00
March-20	Objections Claims Administration &	3/4/2020	KBD	390	0.3 exchange correspondence with J. Wine and A. Watychowicz regarding communications with claimants (.3)	\$	117.00
March-20	Objections Claims Administration &	3/5/2020	KBD	390	0.1 Exchange correspondence with N. Mirjanich regarding submitted claims (.1)	\$	39.00
March-20	Objections Claims Administration &	3/5/2020	KBD	390	0.1 exchange correspondence with J. Wine regarding communications with claimants regarding master claims	\$	39.00
March-20	Objections Claims Administration &	3/6/2020	KBD	390	spreadsheet (.1). 0.1 Exchange correspondence with N. Mirjanich regarding claims (.1)	\$	39.00
March-20	Objections Claims Administration &	3/6/2020	KBD	390	0.2 exchange correspondence with J. Wine regarding claimant communication regarding master claims	\$	78.00
March-20	Objections Claims Administration &	3/6/2020	KBD	390	spreadsheet and roll-overs (.2) 0.1 study correspondence from J. Wine regarding claimant submissions (.1).	\$	39.00
March-20	Objections Claims Administration & Objections	3/9/2020	KBD	390	0.2 Draft correspondence to J. Wine regarding rollover issue with claim.	\$	78.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 73 of 157 PageID #:65106

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
	laims Administration & bjections	3/10/2020	KBD	on 390	1.5 Work with J. Wine and J. Rak on claims (1.5)	\$	585.00
March-20 C	laims Administration & bjections	3/10/2020	KBD	390	0.2 exchange correspondence with A. Watychowicz regarding response to claimant inquiry on properties status (.2).	\$	78.00
March-20 C	laims Administration & bjections	3/11/2020	KBD	390	1.3 Work on claims analysis, including and exchange correspondence with J. Wine on claims analysis and review of claimants' information (1.3)	\$	507.00
March-20 C	laims Administration & bjections	3/11/2020	KBD	390	O.5 telephone conference with document repository vendor and J. Wine regarding vendor services and available technology (.5).	\$	195.00
March-20 C	laims Administration & bjections	3/12/2020	KBD	390	0.3 Confer with J. Wine regarding vendor work to process claims (.3)	\$	117.00
March-20 C	laims Administration & bjections	3/12/2020	KBD	390	2.5 meeting with claims vendor representative regarding claim form, documentation processing, and work to produce records to claimants (2.5)	\$	975.00
March-20 C	laims Administration & bjections	3/13/2020	KBD	390	0.2 Study correspondence from claims vendor regarding claims processing issues (.2)	\$	78.00
March-20 C	laims Administration & bjections	3/13/2020	KBD	390	0.2 exchange correspondence with J. Wine regarding work with claims vendor to address claims processing issues (2).	\$	78.00
March-20 C	laims Administration & bjections	3/16/2020	KBD	390	0.1 exchange correspondence with J. Wine regarding work on claims review vendor cost (.1).	\$	39.00
March-20 C	laims Administration & bjections	3/18/2020	KBD	390	0.4 Exchange correspondence with J. Wine and A. Watychowicz regarding answers to FAQ for claims process, revise same, and amendment to master claims spreadsheet (.4)	\$	156.00
March-20 C	laims Administration & bjections	3/19/2020	KBD	390	O.3 Exchange correspondence with A. Watychowicz and J. Wine regarding communications with claimants regarding claims process and timing.	\$	117.00
March-20 C	laims Administration & bjections	3/23/2020	KBD	390	0.2 Telephone conference with J. Wine regarding work by vendor (.2)	\$	78.00
March-20 C	laims Administration & bjections	3/23/2020	KBD	390	0.4 telephone conference with vendor representative (.4)	\$	156.00
March-20 C	laims Administration & bjections	3/24/2020	KBD	390	1.2 Telephone conference with lenders counsel regarding claims process, motion, and background (1.2)	\$	468.00
March-20 C	laims Administration & bjections	3/25/2020	KBD	390	0.2 Exchange correspondence with A. Watychowicz communications with claimant regarding claim process and timing (.2)	\$	78.00
March-20 A	sset Disposition	3/2/2020	AEP	390	0.4 lender objections to claims resolution procedures (.4)	\$	156.00
March-20 B	usiness Operations	3/5/2020	JR	140	1.2 organize receivership documents regarding expenditures related to all properties for January (1.2)	\$	168.00
	usiness Operations	3/9/2020	AW	140	0.1 confer with K. Duff regarding same and respond to property manager (.1)	\$	14.00
	usiness Operations	3/20/2020	AW	140	0.3 Communicate with K. Duff regarding documents and arrange for transfer of same (.3)	\$	42.00
	usiness Operations	3/20/2020	AW	140	0.1 arrange for transfer of records to A. Porter (.1).	\$	14.00
	usiness Operations	3/24/2020	JRW	260	0.1 all angle for transfer of records to A. Forter (.1). 0.3 telephone conference with K. Duff and M. Rachlis regarding pending matters (.3).	\$	78.00
	usiness Operations	3/26/2020	AW	140	0.3 telephone contenence with K. Buh and W. Kachilis regarding pending matters (.3). 0.1 call with E. Duff regarding details of this project (.1)	\$	14.00
		3/26/2020	AW	140		э \$	252.00
	usiness Operations	3/30/2020	AW	140	1.8 review provided spreadsheets, supplement as per call with E. Duff, and detailed email regarding same (1.8).	\$ \$	14.00
March-20 C	usiness Operations laims Administration & biections	3/2/2020	AW	140	 0.1 execute final list as per K. Duff's authorization and forward for submission to broker (.1). 0.3 Attention to email from K. Duff regarding claimant's voicemail related to claims process motion, review emails with similar concerns, and email receivership team regarding same (.3) 	\$	42.00
March-20 C	laims Administration &	3/2/2020	AW	140	0.6 prepare service and serve claims motion via mail (.6)	\$	84.00
March-20 C	bjections laims Administration & bjections	3/2/2020	AW	140	1.5 work on claims process (1.5)	\$	210.00
March-20 C	laims Administration & bjections	3/2/2020	KMP	140	1.5 Work on claims process motion and plan for compiling and organizing information necessary to prepare required framing reports and analyses of claims, and regarding other claims-related issues.	\$	210.00
March-20 C	laims Administration & bjections	3/2/2020	MR	390	0.3 attention to protective order related issues and follow up regarding same (.3).	\$	117.00
March-20 C	laims Administration & bjections	3/3/2020	JRW	260	3.1 Research regarding claimant inquiries and amendment of Exhibit 1 to claims process motion.	\$	806.00
March-20 C	laims Administration & bjections	3/3/2020	MR	390	0.2 review e-mails regarding protective order and follow conferences regarding protective order issues (.2).	\$	78.00
March-20 C	laims Administration & bjections	3/4/2020	AW	140	0.6 Work on answers to FAQ (.6)	\$	84.00
March-20 C	laims Administration & bjections	3/4/2020	JRW	260	0.6 Revise protective order to address comments provided by lender's counsel [Napoli] (.6)	\$	156.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 74 of 157 PageID #:65107

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	0	bjection
March-20 Claims Administration & Objections	3/4/2020	JRW	on 260	1.2 draft and revise stock responses to FAQs (1.2)	\$	312.00
March-20 Claims Administration & Objections	3/4/2020	JRW	260	3.8 research and respond to multiple claimant inquiries and related update on status (3.8)	\$	988.00
March-20 Claims Administration & Objections	3/4/2020	MR	390	0.1 follow up regarding issues on claims process (.1).	\$	39.00
March-20 Claims Administration & Objections	3/5/2020	AW	140	0.1 Attention to revisions to FAQ (.1)	\$	14.00
March-20 Claims Administration & Objections	3/5/2020	AW	140	0.2 apply revisions to FAQ (.2).	\$	28.00
March-20 Claims Administration & Objections	3/5/2020	JRW	260	0.3 review and revise responses to frequently asked questions (.3).	\$	78.00
March-20 Claims Administration & Objections	3/5/2020	MR	390	0.3 Attention to various issues and objections and further issues on claims process.	\$	117.00
March-20 Claims Administration & Objections	3/6/2020	JRW	260	3.9 Continued work to resolve multiple inquiries from claimants and amendment of master claims spreadsheet listing claims against properties.	\$	1,014.00
March-20 Claims Administration & Objections	3/9/2020	AW	140	1.1 Work on claims process, claims portal, claims administration, and review.	\$	154.00
March-20 Claims Administration & Objections	3/9/2020	MR	390	0.2 Further attention to protective order issues.	\$	78.00
March-20 Claims Administration & Objections March-20 Claims Administration &	3/10/2020 3/10/2020	JRW MR	260 390	0.1 review revised draft confidentiality order (.1).0.2 Additional review of comments and follow up regarding same relative to elements of protective order.	\$ \$	26.00 78.00
Objections March-20 Claims Administration &	3/11/2020	AW	140	1.1 work on master spreadsheet of claims on property by property basis (1.1)	\$	154.00
Objections March-20 Claims Administration &	3/11/2020	JR	140	0.1 exchange correspondence with J. Wine regarding master EquityBuild spreadsheet (.1).	\$	14.00
Objections March-20 Claims Administration &	3/11/2020	JRW	260	0.8 review spreadsheet and communications to vendor regarding updating database with additional or amended	\$	208.00
Objections March-20 Claims Administration &	3/11/2020	JRW	260	claim documentation (.8) 0.6 telephone conference with document repository vendor and K. Duff regarding potential services, and related	\$	156.00
Objections March-20 Claims Administration &	3/12/2020	AW	140	conference with K. Duff (.6). 0.2 Several revisions FAQ list and communicate with J. Wine regarding same (.2)	\$	28.00
Objections March-20 Claims Administration &	3/12/2020	AW	140	2.5 meeting with claims vendor (2.5).	\$	350.00
Objections March-20 Claims Administration &	3/12/2020	JRW	260	3.5 prepare for and attend meeting with claims vendor, K. Duff, A. Watychowicz and J. Rak regarding issues with	\$	910.00
Objections March-20 Claims Administration &	3/13/2020	JRW	260	claims databases, proofs of claim, and migration of supporting data (3.5). 0.1 review email summary of meeting with claims vendor (.1).	\$	26.00
Objections March-20 Claims Administration &	3/14/2020	AW	140	0.6 Call with J. Wine regarding master spreadsheet and requests to claims vendor.	\$	84.00
Objections March-20 Claims Administration & Objections	3/14/2020	JRW	260	0.6 Telephone conference with A. Watychowicz regarding claims vendor project for updating and correcting claimant data (.6)	\$	156.00
March-20 Claims Administration & Objections	3/15/2020	JRW	260	2.8 Update spreadsheet listing corrections and additions to claimant information and related email to claims vendor.	\$	728.00
March-20 Claims Administration & Objections	3/16/2020	AW	140	1 Teleconference with claims vendor and J. Wine regarding revisions to database and new tasks (1.0)	\$	140.00
March-20 Claims Administration & Objections	3/16/2020	AW	140	0.6 work with J. Wine on revisions to master spreadsheet (.6)	\$	84.00
March-20 Claims Administration & Objections	3/16/2020	AW	140	0.4 respond to emails from claimants and update claims spreadsheet (.4)	\$	56.00
March-20 Claims Administration & Objections	3/16/2020	AW	140	0.1 and claimant who did not fill out claim form correctly (.1)	\$	14.00
March-20 Claims Administration & Objections	3/16/2020	AW	140	0.7 review files prepared for transfer to claims vendor, draft cover letter regarding same, and communicate about details with J. Wine (.7).	\$	98.00
March-20 Claims Administration & Objections	3/16/2020	JRW	260	1 telephone conference with claims vendor regarding claims database issues and additional work on claim amendments and supplementation (1.0)	\$	260.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 75 of 157 PageID #:65108

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Ob	jection
	Keeper	Rate	Hours	Descripti on	Cost		
	Claims Administration & Objections	3/16/2020	JRW	260	0.2 related email exchanges with K. Duff and claims vendor regarding statement of work (.2)	\$	52.00
March-20	Claims Administration &	3/17/2020	AW	140	0.4 Call with J. Wine regarding transfer of files to claims vendor and reorganize files as discussed (.4)	\$	56.00
March-20	Objections Claims Administration &	3/17/2020	JRW	260	1.3 Study claims documentation and group into new claims, amended or supplemented claims (1.3)	\$	338.00
March-20	Objections Claims Administration &	3/17/2020	JRW	260	0.6 related telephone conference with A. Watychowicz and correspondence to claims vendor regarding provided	\$	156.00
March-20	Objections Claims Administration &	3/18/2020	AW	140	documents (.6) 0.2 Communicate with claims vendor regarding transfer of files and questions (.2)	\$	28.00
March-20	Objections Claims Administration &	3/18/2020	AW	140	0.2 update to FAQ (.2)	\$	28.00
March-20	Objections Claims Administration &	3/18/2020	AW	140	0.1 attention to spreadsheets from claims vendor (.1)	\$	14.00
March-20	Objections Claims Administration &	3/18/2020	JRW	260	1.2 work with A. Watychowicz and K. Duff to revise and supplement standard responses to frequently asked	\$	312.00
March-20	Objections Claims Administration &	3/18/2020	JRW	260	questions (1.2) 0.4 study spreadsheet from vendor of proof of claim data (.4)	\$	104.00
March-20	Objections Claims Administration &	3/18/2020	JRW	260	0.4 work with J. Rak on master spreadsheet and investigation of rollovers (.4).	\$	104.00
March-20	Objections Claims Administration &	3/19/2020	MR	390	0.4 Attention to issues regarding claims process and related matters.	\$	156.00
March-20	Objections Claims Administration &	3/20/2020	AW	140	0.8 Participate in conference call with J. Wine, A. Pruitt and claims vendor regarding transfer of data, accuracy of	\$	112.00
March-20	Objections Claims Administration &	3/20/2020	AW	140	same, and further steps (.8) 0.3 update Master Spreadsheet (.3)	\$	42.00
March-20	Objections Claims Administration &	3/20/2020	AW	140	0.2 and vendor's update (.2)	\$	28.00
March-20	Objections Claims Administration & Objections	3/20/2020	AW	140	0.1 confer with J. Wine regarding institutional lender's claims and properties (.1).	\$	14.00
March-20	Claims Administration &	3/20/2020	AW	140	0.2 follow up call with J. Wine regarding same (.2)	\$	28.00
March-20	Objections Claims Administration & Objections	3/20/2020	JRW	260	0.8 conference call with claims vendor, A. Watychowicz and A. Pruitt regarding claims databases and problem solving (.8)	\$	208.00
March-20	Claims Administration &	3/20/2020	JRW	260	0.2 conference with vendor regarding access to claims database (.2)	\$	52.00
March-20	Objections Claims Administration & Objections	3/20/2020	JRW	260	0.2 conference with J. Rak regarding master claims spreadsheet (.2).	\$	52.00
March-20	Claims Administration & Objections	3/23/2020	JRW	260	0.1 attention to correspondence with counsel for lender regarding claims process (.1)	\$	26.00
March-20	Claims Administration & Objections	3/23/2020	JRW	260	0.1 communicate with K. Duff regarding vendor project (.1).	\$	26.00
March-20	Claims Administration & Objections	3/24/2020	AP	260	3.4 Analyze claims with respect to claim amount and claims vendor data extraction (3.4)	\$	884.00
March-20	Claims Administration & Objections	3/24/2020	AP	260	0.8; telephone conference with J. Wine regarding same (.8).	\$	208.00
March-20	Claims Administration & Objections	3/25/2020	AP	260	0.7 Telephone conference with J. Wine regarding analysis of claim amount and claims vendor data extraction (.7)	\$	182.00
March-20	Claims Administration & Objections	3/25/2020	AP	260	0.6 further analyze claims with respect to same (.6)	\$	156.00
March-20	Claims Administration & Objections	3/25/2020	AP	260	0.5 review and organize claims analysis information (.5).	\$	130.00
March-20	Claims Administration & Objections	3/25/2020	AW	140	0.1 Communicate with J. Wine regarding claims database issue (.1)	\$	14.00
March-20	Claims Administration & Objections	3/25/2020	AW	140	0.2 work with A. Pruitt to deliver requested files to J. Wine (.2)	\$	28.00
March-20	Claims Administration & Objections	3/25/2020	AW	140	0.7 call with J. Wine, J. Rak, and A. Pruitt regarding claims projects (.7).	\$	98.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 76 of 157 PageID #:65109

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Ol	bjection
	Keeper	Rate	Hours	Descripti on	Cost		
	Claims Administration & Objections	3/25/2020	JRW	260	1.6 Multiple conference calls with claims vendor regarding data export from claims database, revisions to enhance search capability in claims database, property numbers, and revisions to claimant information (1.6)	\$	416.00
	Claims Administration & Objections	3/25/2020	JRW	260	2.5 research regarding claim submissions and related revisions to master claims spreadsheet and follow-up correspondence to claims vendor (2.5)	\$	650.00
March-20	Claims Administration & Objections	3/25/2020	JRW	260	Conference call with A. Pruitt, A. Watychowicz and J. Rak regarding procedure for investigating claims export of claims data and rollover claims (.7)	\$	182.00
March-20	Claims Administration & Objections	3/25/2020	JRW	260	1.4 investigate rollover claims, pull claim submissions and related correspondence to K. Duff (1.4).	\$	364.00
March-20	Claims Administration & Objections	3/26/2020	AP	260	0.7 Confer with J. Wine regarding claims analysis (.7)	\$	182.00
March-20	Claims Administration & Objections	3/26/2020	AP	260	5.9 continue analysis of claims submissions for claim amount in reference to claims vendor data for properties (5.9).	\$	1,534.00
March-20	Claims Administration & Objections	3/26/2020	AW	140	0.1 Update FAQ (.1)	\$	14.00
March-20	Claims Administration & Objections	3/26/2020	AW	140	0.1 call with J. Wine regarding instance IDs and proposed simplification (.1)	\$	14.00
March-20	Claims Administration & Objections	3/26/2020	AW	140	0.1 submit update request as per claimant's email and update Receiver's records (.1).	\$	14.00
March-20	Claims Administration & Objections	3/26/2020	JRW	260	0.7 Work with A. Pruitt on investigation and amendment of claims data for multiple claimants (.7)	\$	182.00
March-20	Claims Administration & Objections	3/26/2020	JRW	260	0.2 exchange correspondence with claims vendor regarding status of various projects (.2).	\$	52.00
March-20	Claims Administration & Objections	3/26/2020	KMP	140	3.6 Continued review of documents received from EB accountant for potential claims-related information.	\$	504.00
March-20	Claims Administration & Objections	3/27/2020	AP	260	3.6 Analyze claims with respect to claim amount and claims vendor data extraction (3.6)	\$	936.00
March-20	Claims Administration & Objections	3/27/2020	AP	260	1 work with J. Wine to analyze claims submissions (1.0)	\$	260.00
March-20	Claims Administration & Objections	3/27/2020	AP	260	0.1 telephone conference with claims vendor representative regarding property designations in master claims spreadsheet (.1).	\$	26.00
March-20	Claims Administration & Objections	3/27/2020	AW	140	0.1 attention to exchange regarding claimant's submission and email J. Wine regarding same (.1)	\$	14.00
March-20	Claims Administration & Objections	3/27/2020	JRW	260	1 work with A. Pruitt on analyzing rollovers and updating claimant information on master claims spreadsheet (1.0)	\$	260.00
March-20	Claims Administration & Objections	3/27/2020	JRW	260	0.4 telephone conference with K. Duff regarding rollovers (.4)	\$	104.00
March-20	Claims Administration & Objections	3/27/2020	JRW	260	0.3 correspondence with K. Duff and A. Watychowicz and review proofs of claim (.3).	\$	78.00
March-20	Claims Administration & Objections	3/30/2020	AP	260	2.7 Analyze claims submissions for claim amount in reference to claims vendor data for properties (2.7)	\$	702.00
March-20	Claims Administration & Objections	3/30/2020	AP	260	0.4 work with J. Wine to analyze claims (.4).	\$	104.00
March-20	Claims Administration & Objections	3/30/2020	AW	140	0.1 Confer with J. Wine regarding revisions by vendor and incorporate on master spreadsheet (.1)	\$	14.00
March-20	Claims Administration & Objections	3/30/2020	AW	140	0.4 start revisions to master list (.4)	\$	56.00
March-20	Claims Administration & Objections	3/30/2020	JRW	260	0.1 Review instruction for proof of claim form (.1)	\$	26.00
March-20	Claims Administration & Objections	3/30/2020	JRW	260	0.2 confer with A. Watychowicz regarding updating of master claims spreadsheet (.2)	\$	52.00
March-20	Claims Administration & Objections	3/30/2020	JRW	260	2.5 review and respond to notes and questions from claims vendor regarding revisions to claimant information (2.5)	\$	650.00
March-20	Claims Administration & Objections	3/30/2020	JRW	260	0.3 related telephone conference with claims vendor (.3)	\$	78.00
March-20	Objections Claims Administration & Objections	3/30/2020	JRW	260	0.4 work with A. Pruitt on researching rollover transactions (.4).	\$	104.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 77 of 157 PageID #:65110

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ol	bjection
	Claims Administration & Objections	3/31/2020	AP	on 260	0.3 Work with J. Wine to analyze claims submissions for claim amount in reference to claims vendor data for properties (.3)	\$	78.00
March-20	Claims Administration & Objections	3/31/2020	AP	260	1.7 further analyze claims submissions for same (1.7).	\$	442.00
March-20	Claims Administration & Objections	3/31/2020	AW	140	0.2 Attention to email from claims vendor regarding updated claims (.2)	\$	28.00
March-20	Claims Administration & Objections	3/31/2020	AW	140	0.1 attention to email regarding appendices to claims forms and call regarding same (.1)	\$	14.00
March-20	Claims Administration & Objections	3/31/2020	JRW	260	5.1 attention to researching and updating rollover claim submissions of multiple claimants (5.1)	\$	1,326.00
March-20	Claims Administration & Objections	3/31/2020	JRW	260	0.4 related oral and written communications with A. Pruitt regarding amendment of master claims spreadsheet (.4)	\$	104.00
March-20 (Claims Administration & Objections	3/31/2020	JRW	260	0.3 correspondence to claims vendor regarding remedy for recurring issue regarding claims submissions (.3).	\$	78.00
April-20	Claims Administration & Objections	4/1/2020	KBD	390	1 video conference with potential document repository vender (1.0)	\$	390.00
April-20	Claims Administration & Objections	4/1/2020	KBD	390	0.4 telephone conference with J. Wine regarding claims analysis and communications with claims vendor (.4).	\$	156.00
April-20	Claims Administration & Objections	4/2/2020	KBD	390	0.3 Exchange correspondence with J. Wine and A. Watychowicz regarding claims submissions and claims vendor records (.3)	\$	117.00
April-20	Claims Administration & Objections	4/9/2020	KBD	390	0.6 Evaluate document repository database and exchange correspondence with vendor regarding same (.6)	\$	234.00
April-20	Claims Administration & Objections	4/10/2020	KBD	390	0.3 Exchange correspondence with M. Rachlis regarding briefing on claims process motion and communications with claimants' counsel and SEC relating to same (.3)	\$	117.00
April-20	Claims Administration & Objections	4/10/2020	KBD	390	0.2 exchange correspondence with J. Wine regarding claims review and funds (.2)	\$	78.00
April-20	Claims Administration & Objections	4/10/2020	KBD	390	0.2 exchange correspondence with claims vendor regarding statement of work, progress, and timing (.2).	\$	78.00
April-20	Claims Administration & Objections	4/14/2020	KBD	390	1.4 Telephone conference with J. Wine and M. Rachlis regarding claims review, challenges, process, and timing (1.4)	\$	546.00
April-20	Claims Administration & Objections	4/14/2020	KBD	390	1.1 telephone conference with M. Rachlis and E. Duff regarding same, claims process, and potential claims (1.1)	\$	429.00
April-20	Claims Administration & Objections	4/14/2020	KBD	390	1.4 telephone conference with A. Porter and M. Rachlis regarding claims analysis and review and various related EquityBuild documentation (1.4)	\$	546.00
April-20	Claims Administration & Objections	4/14/2020	KBD	390	0.2 study correspondence from claims vendor and J. Wine regarding claims review (.2)	\$	78.00
April-20	Claims Administration & Objections	4/15/2020	KBD	390	1.3 Telephone conference with M. Rachlis, A. Porter, and J. Wine regarding claims analysis, master claims spreadsheet, process for identifying roll-over claims and other amendments to master claims spreadsheet, and various related issues (1.3)	\$	507.00
	Claims Administration & Objections	4/15/2020	KBD	390	0.1 exchange correspondence with A. Watychowicz regarding communication with claimants (.1).	\$	39.00
April-20	Claims Administration & Objections	4/16/2020	KBD	390	0.1 exchange correspondence with claimant regarding claims process and representation by counsel (.1)	\$	39.00
April-20	Claims Administration & Objections	4/17/2020	KBD	390	0.2 telephone conference with M. Rachlis regarding same and approach to claims process, framing report, and related issues (.2)	\$	78.00
April-20	Claims Administration & Objections	4/20/2020	KBD	390	0.2 Telephone conference with J. Wine regarding master claims spreadsheet analysis (.2)	\$	78.00
April-20	Claims Administration & Objections	4/27/2020	KBD	390	0.2 Telephone conference with J. Wine regarding claims analysis work (.2)	\$	78.00
April-20	Claims Administration & Objections	4/27/2020	KBD	390	0.2 exchange correspondence regarding review of claims (.2)	\$	78.00
April-20	Claims Administration & Objections	4/28/2020	KBD	390	0.7 Telephone conference with M. Rachlis regarding claims process (.7)	\$	273.00
April-20	Claims Administration & Objections	4/29/2020	KBD	390	0.1 study correspondence from J. Wine regarding review of claims (.1).	\$	39.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 78 of 157 PageID #:65111

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	ojection
April 20 Cl		4/30/2020	KBD	on .		¢	468.00
	aims Administration & ojections	4/30/2020	KBD	390	1.2 Telephone conference with J. Wine, M. Rachlis, and A. Watychowicz regarding claims analysis duplicate claims, roll-overs, incomplete submitted forms, institutional lender forms and supporting documents, non- lender claims, communications with claimants, and amendment to master claims spreadsheet (1.2)	\$	40ö.UU
April-20 Cl	sset Disposition aims Administration &	4/14/2020 4/1/2020	JRW AP	260 260	0.2 telephone conference with A. Porter regarding priority disputes and related legal research (.2).3.1 analyze claims submissions for claim amount in reference to claims vendor data for properties (3.1).	\$ \$	52.00 806.00
April-20 Cl	ojections aims Administration & ojections	4/1/2020	AW	140	0.5 Call with vendor regarding appendices to claims forms (.5)	\$	70.00
April-20 Cl	aims Administration &	4/1/2020	AW	140	0.4 continue revisions to master list (.4).	\$	56.00
April-20 CI	ojections aims Administration & ojections	4/1/2020	JRW	260	0.5 video conference with claims vendor regarding PDF appendices to submitted proof of claim forms (.5)	\$	130.00
April-20 Cl	aims Administration & ojections	4/1/2020	JRW	260	1.4 study and update list of property numbers and related correspondence with claims vendor (1.4)	\$	364.00
April-20 Cl	aims Administration & bjections	4/1/2020	JRW	260	0.6 work with A. Pruitt on entries on master claim spreadsheet (.6)	\$	156.00
April-20 CI	aims Administration & pjections	4/1/2020	JRW	260	0.4 telephone conference with K. Duff regarding claims process and status of amendments to master claims spreadsheet and segregation of supporting documentation by property (.4)	\$	104.00
April-20 Cl	aims Administration & pjections	4/1/2020	JRW	260	0.8 attention to researching claims and amendment of master claims spreadsheet (.8)	\$	208.00
April-20 Cl	aims Administration & bjections	4/1/2020	JRW	260	1 conference call with potential vendor regarding demonstration of document repository platform (1.0).	\$	260.00
April-20 CI	aims Administration &	4/1/2020	MR	390	1 participate in presentation regarding potential document repository (1.0).	\$	390.00
April-20 Cl	ojections aims Administration & ojections	4/2/2020	AEP	390	0.4 Review J. Wine spreadsheet of properties subject to investor-lender claims but not subsumed within receivership estate and reconcile spreadsheet against list of non-receivership properties.	\$	156.00
April-20 Cl	aims Administration & bjections	4/2/2020	AP	260	3.6 Analyze claims with respect to claim amount by property in connection with claims vendor automation process.	\$	936.00
April-20 CI	aims Administration & pjections	4/2/2020	AW	140	0.5 Continue revisions to master list as per instructions (.5)	\$	70.00
April-20 CI	aims Administration & bjections	4/2/2020	JRW	260	0.4 exchange correspondence with claims vendor regarding necessary revisions to claims database (.4)	\$	104.00
April-20 Cl	aims Administration & pjections	4/3/2020	AP	260	2.6 Analyze claims submissions for claim amount in reference to claims vendor data for properties.	\$	676.00
April-20 CI	aims Administration & pjections	4/3/2020	AW	140	0.1 update responses to FAQ (.1)	\$	14.00
April-20 CI	aims Administration &	4/3/2020	AW	140		\$	28.00
April-20 CI	ojections aims Administration &	4/3/2020	AW	140		\$	182.00
April-20 Cl	ojections aims Administration &	4/3/2020	AW	140	(1.3).0.2 email exchanges with claims vendor regarding revisions to database and attention to further exchanges regarding same (.2)	\$	28.00
April-20 CI	ojections aims Administration &	4/3/2020	JRW	260	0.6 Review proof of claim appendices and related correspondence to claims vendor regarding matching	\$	156.00
April-20 CI	ojections aims Administration & ojections	4/3/2020	JRW	260	appendices to claims against individual properties (.6) 0.2 email exchange with claims vendor, K. Duff, and A. Watychowicz regarding unmatched documents on flash drive (.2)	\$	52.00
April-20 Cl	aims Administration & bjections	4/3/2020	JRW	260	0.1 confer with claims vendor regarding amendments to claimant names (.1)	\$	26.00
April-20 CI	aims Administration & pjections	4/6/2020	AP	260	1.5 Review and organize claims analysis information.	\$	390.00
April-20 Cl	aims Administration & bjections	4/6/2020	AW	140	0.1 communicate with J. Wine regarding claim details and (.1)	\$	14.00
April-20 CI	aims Administration & bjections	4/6/2020	AW	140	0.1 follow up with J. Wine regarding revisions to property list and coding (.1)	\$	14.00
April-20 CI	aims Administration & pjections	4/6/2020	AW	140	0.3 revisions to updates to database (.3).	\$	42.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 79 of 157 PageID #:65112

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	C	bjection
April-20	Claims Administration &	4/6/2020	JRW	on 260	0.6 exchange correspondence with claims vendor and A. Watychowicz regarding various claim submissions (.6)	\$	156.00
•	Objections	4/6/2020	JRW	260		•	78.00
·	Claims Administration & Objections				0.3 work with A. Watychowicz on revisions to master property number list (.3)	\$	
•	Claims Administration & Objections	4/6/2020	JRW	260	1.1 continue investigating rollover claims (1.1)	\$	286.00
	Claims Administration & Objections	4/6/2020	JRW	260	0.2 confer with claims vendor regarding claims appendices and issues with claims database (.2)	\$	52.00
April-20	Claims Administration & Objections	4/7/2020	AP	260	3.8 Review and organize claims analysis information.	\$	988.00
April-20	Claims Administration &	4/7/2020	JRW	260	0.5 Continue analysis of claims submissions and updating of vendor data (.5)	\$	130.00
April-20	Objections Claims Administration &	4/8/2020	AP	260	1.1 Review and organize claims analysis information for properties (1.1)	\$	286.00
April-20	Objections Claims Administration &	4/8/2020	AP	260	4.8 review and organize claims analysis information by properties and claimants (4.8).	\$	1,248.00
April-20	Objections Claims Administration &	4/8/2020	AW	140	1.1 apply further revisions to spreadsheet, cross reference vendor's results and communicate with vendor	\$	154.00
April-20	Objections Claims Administration &	4/8/2020	JRW	260	regarding revisions (1.1). 0.3 exchange correspondence with claims vendor regarding corrections to claims data (.3)	\$	78.00
April-20	Objections Claims Administration &	4/8/2020	JRW	260	3.1 continue analyzing multiple proofs of claim and related updating of information in claims vendor database and	\$	806.00
April-20	Objections Claims Administration &	4/9/2020	AP	260	master claims spreadsheet with information regarding loan rollovers (3.1). 4.8 Review and organize claims analysis information by properties and claimants.	\$	1,248.00
April-20	Objections Claims Administration &	4/9/2020	AW	140	0.2 Communicate with J. Wine regarding review of claims with multiple addresses listed in section 3 of proof of	\$	28.00
April-20	Objections Claims Administration &	4/9/2020	AW	140	claim form (.2) 4.5 start working on review of claims and update to Master spreadsheet and revisions (4.5).	\$	630.00
April-20	Objections Claims Administration &	4/9/2020	JRW	260	0.4 Analyze submitted claims in response to inquiry from claims vendor (.4)	\$	104.00
April-20	Objections Claims Administration &	4/9/2020	JRW	260	0.4 work with A. Watychowicz and A. Pruitt on claims analysis (.4)	\$	104.00
April-20	Objections Claims Administration &	4/9/2020	JRW	260	0.1 correspondence with claims vendor regarding proofs of claim in claims databases (.1).	\$	26.00
April-20	Objections Claims Administration &	4/10/2020	AP	260	0.5 Work on claims analysis for properties and claimants (.5)	\$	130.00
April-20	Objections Claims Administration &	4/10/2020	AP	260	3.2 review and organize claims analysis information by properties and claimants (3.2).	\$	832.00
April-20	Objections Claims Administration &	4/10/2020	AW	140	0.1 communicate with J. Wine regarding coding (.1)	\$	14.00
April-20	Objections Claims Administration &	4/10/2020	AW	140	0.3 call with vendor regarding properties and coding (.3)	\$	42.00
	Objections Claims Administration &	4/10/2020	AW	140	0.2 communicate with J. Wine follow up with vendor regarding appearance of some claim forms (.2)	\$	28.00
	Objections Claims Administration &	4/10/2020	AW	140	0.8 continue working on review of claims and update to master spreadsheet and revisions (.8).	\$	112.00
	Objections Claims Administration &	4/10/2020	JRW	260	0.2 review sample claims appendix from claims vendor and related report to K. Duff (.2)	\$	52.00
	Objections Claims Administration &	4/10/2020	JRW	260	0.6 review claim forms and related conference with A. Watychowicz regarding same (.6)	\$	156.00
·	Objections Claims Administration &	4/10/2020	MR	390	0.7 Attention to issues on claims, related review and exchanges regarding same with K. Duff.	\$	273.00
·	Objections Claims Administration &	4/13/2020	AP	260	Work on claims analysis for properties and claimants.	\$	780.00
·	Objections Claims Administration &	4/13/2020	AW	140	O.2 Attention to email from vendor regarding vendor's notes on claims and respond to same (.2)	\$	28.00
·	Objections					ъ \$	
	Claims Administration & Objections	4/13/2020	AW	140	0.3 email exchange with J. Wine regarding real estate portfolio and number of properties, compare vendor's and Receiver's list, review emails regarding same, and confirmation email to J. Wine (.3)	ф	42.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 80 of 157 PageID #:65113

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	0	bjection
April-20 Claims Administration & Objections	4/14/2020	AEP	on 390	1.3 Teleconference with K. Duff and M. Rachlis regarding strategies for streamlining and refining approach to claims process.	\$	507.00
April-20 Claims Administration & Objections	4/14/2020	AP	260	3.9 Review and organize claims analysis information for properties.	\$	1,014.00
April-20 Claims Administration & Objections	4/14/2020	AW	140	0.1 attention to documents from claimant and communicate with K. Duff regarding same (.1)	\$	14.00
April-20 Claims Administration & Objections	4/14/2020	AW	140	4.9 continued review of claims and updates to master and database (4.9).	\$	686.00
April-20 Claims Administration & Objections	4/14/2020	JRW	260	1.4 Extensive telephone conference with K. Duff and M. Rachlis regarding claims process (1.4)	\$	364.00
April-20 Claims Administration & Objections	4/14/2020	JRW	260	0.1 exchange correspondence with claims vendor regarding assets in estate (.1)	\$	26.00
April-20 Claims Administration & Objections	4/14/2020	JRW	260	0.6 work with A. Watychowicz on database revisions and claims against former EquityBuild properties (.6)	\$	156.00
April-20 Claims Administration & Objections	4/14/2020	JRW	260	0.7 study EquityBuild statements and spreadsheet and related summary to K. Duff and M. Rachlis (.7)	\$	182.00
April-20 Claims Administration & Objections	4/14/2020	MR	390	1.8 Conferences with K. Duff and J. Wine regarding claims and prepare for same (1.8)	\$	702.00
April-20 Claims Administration & Objections April-20 Claims Administration &	4/14/2020 4/15/2020	MR AEP	390 390	1.3 further conferences with A. Porter and K. Duff relating to claims (1.3)1 Teleconference with K. Duff, M. Rachlis, and J. Wine regarding complexities associated with administration of	\$	507.00 390.00
Objections	4/15/2020	AEP	390	claims process and alternative strategies for streamlining claimant lists and claims analysis.	Ф	390.00
April-20 Claims Administration & Objections	4/15/2020	AP	260	3.2 Review and organize claims analysis information for properties.	\$	832.00
April-20 Claims Administration & Objections	4/15/2020	AW	140	4.5 Continued review of claims, updates to master and database, and multiple communications with J. Wine regarding issues with claims (4.5)	\$	630.00
April-20 Claims Administration & Objections	4/15/2020	AW	140	0.6 conference with J. Wine regarding suggested revisions and re-coding of master and work on same (.6).	\$	84.00
April-20 Claims Administration & Objections	4/15/2020	JRW	260	0.4 Review client history spreadsheet (.4)	\$	104.00
April-20 Claims Administration & Objections	4/15/2020	JRW	260	0.2 research and related email exchange with A. Watychowicz regarding claimant name (.2)	\$	52.00
April-20 Claims Administration & Objections	4/15/2020	JRW	260	1.4 telephone conference with K. Duff, M. Rachlis and A. Porter regarding claims process (1.4)	\$	364.00
April-20 Claims Administration & Objections	4/15/2020	JRW	260	0.7 review and revise notes in master claims spreadsheet, and related email exchanges with A. Watychowicz and A. Pruitt (.7)		182.00
April-20 Claims Administration & Objections	4/15/2020	JRW	260	2 review multiple proofs of claim and update master claims spreadsheet and necessary corrections to claims database (2.0)	\$	520.00
April-20 Claims Administration & Objections	4/15/2020	JRW	260	0.1 telephone conference with claims vendor regarding projected completion of project (.1)	\$	26.00
April 20 Claims Administration & Objections	4/15/2020 4/15/2020	JRW MR	260	0.7 telephone conferences with A. Watychowicz regarding procedures for evaluating claims (.7).0.5 Prepare for (.5)	\$ \$	182.00 195.00
April-20 Claims Administration & Objections April-20 Claims Administration &	4/15/2020	MR	390 390	1.4 and participate in lengthy call regarding claims process issues with K. Duff, J. Wine and A. Porter (1.4).	\$ \$	546.00
Objections April-20 Claims Administration &	4/16/2020	AW	140	0.7 Continue review of claims and revisions to Master (.7)	\$	98.00
Objections April-20 Claims Administration &	4/16/2020	AW	140	3.5 start claim review as per new instructions and report to J. Wine regarding progress (3.5)	\$	490.00
Objections April-20 Claims Administration &	4/16/2020	AW	140	1.1 continue review of claims (1.1).	\$	154.00
Objections April-20 Claims Administration &	4/16/2020	JRW	260	4.5 Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims	\$	1,170.00
Objections April-20 Claims Administration &	4/16/2020	JRW	260	spreadsheet, and update information in claims database for claimants (4.5) 0.2 correspond with claims vendor regarding next set of revisions to claims database (.2)	\$	52.00
Objections						

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 81 of 157 PageID #:65114

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	C	Objection
April-20 Claims Administration & Objections	4/16/2020	JRW	on 260	0.6 work with A. Watychowicz on claims analysis procedures (.6)	\$	156.00
April-20 Claims Administration & Objections	4/16/2020	MR	390	0.2 Exchange regarding follow up from investor and attention to issues on scheduling regarding claim process motion and related issues.	\$	78.00
April-20 Claims Administration & Objections	4/17/2020	AW	140	4.9 continued review of claims and update to master claims list (4.9).	\$	686.00
April-20 Claims Administration & Objections	4/17/2020	JRW	260	2.6 Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (2.6)	\$	676.00
April-20 Claims Administration & Objections	4/17/2020	JRW	260	0.5 work with A. Watychowicz on investigation and respond to claimant inquiries (.5)	\$	130.00
April-20 Claims Administration & Objections	4/17/2020	JRW	260	0.6 study proofs of claim and update master claims spreadsheet and revisions list (.6)	\$	156.00
April-20 Claims Administration & Objections	4/17/2020	JRW	260	1 investigate and respond to issues raised by claims vendor (1.0)	\$	260.00
April-20 Claims Administration & Objections	4/17/2020	JRW	260	0.4 telephone conference with K. Duff regarding claims process (.4)	\$	104.00
April-20 Claims Administration & Objections	4/17/2020	JRW	260	0.4 technical support from claims vendor regarding database problems (.4).	\$	104.00
April-20 Claims Administration & Objections	4/17/2020	MR	390	0.2 Attention to claims related issues (.2)	\$	78.00
April 20 Claims Administration & Objections	4/17/2020	MR	390	0.4 conference with K. Duff on claims process issues (.4).	\$ \$	156.00
April-20 Claims Administration & Objections	4/20/2020	AW	140	0.1 attention to spreadsheet emailed by J. Wine and review same (.1)	\$ \$	14.00
April-20 Claims Administration & Objections April-20 Claims Administration &	4/20/2020 4/20/2020	AW JRW	140 260	3.5 analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (3.5).4.7 analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims	\$ \$	490.00 1,222.00
Objections April-20 Claims Administration &	4/20/2020	JRW	260	spreadsheet, and update information in claims database for claimants (4.7) 0.2 work with A. Watychowicz on procedures for analyzing claims (.2)	\$ \$	52.00
Objections April-20 Claims Administration &	4/20/2020	JRW	260	0.2 work with A. Watychowicz on procedures for analyzing daints (.2) 0.2 email exchange and telephone conference with claims vendor regarding coding of claims against funds (.2).	\$	52.00
Objections April-20 Claims Administration &	4/20/2020	KMP	140	0.6 Work with A. Watychowicz on process for claims review.	\$	84.00
Objections April-20 Claims Administration &	4/20/2020	MR	390	0.7 Review materials regarding claims on properties (.7)	\$	273.00
Objections April-20 Claims Administration &	4/20/2020	MR	390	0.3 follow up with K. Duff regarding same (.3)	\$	117.00
Objections April-20 Claims Administration &	4/20/2020	MR	390	0.8 attention to various claim process related issues and emails (.8)	\$	312.00
Objections April-20 Claims Administration &	4/20/2020	MR	390	0.2 and additional conferences with K. Duff regarding same (.2).	\$	78.00
Objections April-20 Claims Administration &	4/21/2020	AP	260	1.5 Work with J. Wine on claims analysis for properties (1.5)	\$	390.00
Objections April-20 Claims Administration &	4/21/2020	AP	260	3.8 analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims	\$	988.00
Objections April-20 Claims Administration &	4/21/2020	AW	140	spreadsheet, and update information in claims database for claimants (3.8). 3.8 Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims	\$	532.00
Objections April-20 Claims Administration &	4/21/2020	AW	140	spreadsheet, and update information in claims database for claimants (3.8) 0.1 attention to email from claimant regarding change of mailing address and update same (.1)	\$	14.00
Objections April-20 Claims Administration &	4/21/2020	JRW	260	3.2 Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims	\$	832.00
Objections April-20 Claims Administration &	4/22/2020	AP	260	spreadsheet, and update information in claims database for claimants (3.2) 3 Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims	\$	780.00
Objections April-20 Claims Administration &	4/22/2020	AW	140	spreadsheet, and update information in claims database for claimants. 8.3 Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims	\$	1,162.00
Objections April-20 Claims Administration & Objections	4/22/2020	JRW	260	spreadsheet, and update information in claims database for claimants (8.3) 4.9 Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (4.9)	\$	1,274.00

Entry Date Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
Keeper	Rate	Hours	Descripti on	Cost		
April-20 Claims Administration & Objections	4/22/2020	JRW	260	0.6 telephone conferences with A. Watychowicz regarding claims analysis (.6)	\$	156.00
April-20 Claims Administration & Objections	4/22/2020	JRW	260	0.2 exchange correspondence with K. Duff regarding property and funds (.2).	\$	52.00
April-20 Claims Administration & Objections	4/22/2020	SZ	110	5 Review of 31 individual claims to ensure accuracy between investors' submissions and those on record with Receiver and claims vendor.	\$	550.00
April-20 Claims Administration & Objections	4/23/2020	AP	260	5.8 Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants.	\$	1,508.00
April-20 Claims Administration & Objections	4/23/2020	AW	140	6.4 analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (6.4)	\$	896.00
April-20 Claims Administration & Objections	4/23/2020	JRW	260	1.8 Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (1.8)	\$	468.00
April-20 Claims Administration & Objections	4/23/2020	JRW	260	0.1 exchange correspondence with claims vendor regarding updates to claims data (.1).	\$	26.00
April-20 Claims Administration & Objections	4/23/2020	SZ	110	4.5 Continued to review individual claims to ensure accuracy between investors' submissions and those on record with Receiver and claims vendor.	\$	495.00
April-20 Claims Administration & Objections	4/24/2020	AP	260	0.2 Review correspondence from J. Wine and vendor and respond regarding analysis of claim for claimant (.2)	\$	52.00
April-20 Claims Administration & Objections	4/24/2020	AP	260	2.4 analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (2.4).	\$	624.00
April-20 Claims Administration & Objections	4/24/2020	JRW	260	5.8 Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (5.8)	\$	1,508.00
April-20 Claims Administration & Objections	4/24/2020	SZ	110	4.5 Reviewed property and monetary claims submitted by investors to ensure accuracy between investors' submissions and those on record with Receiver and claims vendor.	\$	495.00
April-20 Claims Administration & Objections	4/27/2020	AP	260	1.7 Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants.	\$	442.00
April-20 Claims Administration & Objections	4/27/2020	AW	140	5.4 analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (5.4).	\$	756.00
April-20 Claims Administration & Objections	4/27/2020	JRW	260	5.5 Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (5.5)	\$	1,430.00
April-20 Claims Administration & Objections	4/27/2020	JRW	260	0.2 confer with E. Duff , A. Watychowicz and K. Duff regarding claims (.2).	\$	52.00
April-20 Claims Administration & Objections	4/27/2020	SZ	110	4.3 Reviewed property and monetary claims submitted by investors to ensure accuracy between investors' submissions and those on record with Receiver and claims vendor.	\$	473.00
April-20 Claims Administration & Objections	4/28/2020	AW	140	5.5 analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (5.5).	\$	770.00
April-20 Claims Administration & Objections	4/28/2020	JRW	260	Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (2.5)	\$	650.00
April-20 Claims Administration & Objections	4/28/2020	JRW	260	O.3 correspond with E. Duff, A. Porter and A. Watychowicz regarding institutional lender claims and related revision of TNET report for claims vendor (.3).	\$	78.00
April-20 Claims Administration & Objections	4/28/2020	MR	390	0.7 Conferences with K. Duff regarding claims process review.	\$	273.00
April-20 Claims Administration & Objections	4/28/2020	SZ	110	4.2 Reviewed property and monetary claims submitted by investors to ensure accuracy between investors' submissions and those on record with Receiver and claims vendor.	\$	462.00
April-20 Claims Administration & Objections	4/29/2020	AW	140	Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (2.7)	\$	378.00
April-20 Claims Administration & Objections	4/29/2020	JRW	260	2.1 Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (2.1)	\$	546.00
April-20 Claims Administration & Objections	4/29/2020	JRW	260	0.2 prepare new set of revisions to claims database and related correspondence to claims vendor (.2)	\$	52.00
April-20 Claims Administration & Objections	4/29/2020	JRW	260	0.3 analyze duplicate claims and related correspondence to claims vendor (.3).	\$	78.00
April-20 Claims Administration & Objections	4/29/2020	SZ	110	4.2 Reviewed property and monetary claims submitted by investors to ensure accuracy between investors' submissions and those on record with Receiver and claims vendor.	\$	462.00
April-20 Claims Administration & Objections	4/30/2020	AW	140	3.6 Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (3.6)	\$	504.00
April-20 Claims Administration & Objections	4/30/2020	AW	140	1.2 conference call with J. Wine, K. Duff, and M. Rachlis regarding claims (1.2)	\$	168.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 83 of 157 PageID #:65116

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Ob	jection
	Keeper	Rate	Hours	Descripti on	Cost		
•	ns Administration & ctions	4/30/2020	AW	140	0.1 attention to encrypted message from vendor (.1).	\$	14.00
	ns Administration & ctions	4/30/2020	JRW	260	1.4 Analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (1.4)	\$	364.00
•	ns Administration & ctions	4/30/2020	JRW	260	1.2 telephone conference with K. Duff, M. Rachlis and A. Watychowicz regarding status of claims analysis, treatment of rollovers and duplicate claims, and institutional lender and trade creditor claims (1.2)	\$	312.00
	ns Administration &	4/30/2020	JRW	260	0.4 study claims of claimant and update master claims spreadsheet and related telephone conference with A. Watychowicz (.4)	\$	104.00
April-20 Claim	ns Administration & ctions	4/30/2020	JRW	260	telephone conference with claims vendor regarding unmatched claims in database and documentation in support of claimant (.4)	\$	104.00
April-20 Clain	ns Administration &	4/30/2020	JRW	260	0.2 related review of supporting documentation (.2)	\$	52.00
April-20 Claim	ns Administration & ctions	4/30/2020	JRW	260	1.1 work with A. Watychowicz and S. Zjalic regarding master claims spreadsheet, and remaining questions regarding claims (1.1)	\$	286.00
April-20 Claim	ns Administration &	4/30/2020	JRW	260	0.1 exchange correspondence with claims vendor regarding corrections to claims database (.1)	\$	26.00
April-20 Claim	ns Administration &	4/30/2020	JRW	260	1 study records regarding claims made by independent contractors, trade creditors, and institutional lenders, and claims designated as type "other" (1.0).	\$	260.00
April-20 Claim	ns Administration & ctions	4/30/2020	MR	390	Conference with J. Wine, K. Duff and A. Watychowicz regarding attention to claims analysis, rollover issues and other claims.	\$	468.00
May-20 Claim	ns Administration &	5/2/2020	KBD	390	0.2 Exchange correspondence with A. Watychowicz regarding rollovers.	\$	78.00
May-20 Claim	ns Administration &	5/3/2020	KBD	390	0.2 work on issues regarding production of documents relating to claims (.2).	\$	78.00
May-20 Claim	ns Administration & ctions	5/4/2020	KBD	390	0.2 Telephone conference with J. Wine regarding removal of duplicate claims and institutional lender claims (.2)	\$	78.00
May-20 Claim	ns Administration & ctions	5/4/2020	KBD	390	0.2 study rollover analysis for certain investors (.2)	\$	78.00
May-20 Clain	ns Administration &	5/5/2020	KBD	390	0.1 Telephone conference with J. Wine regarding claims analysis and review (.1)	\$	39.00
May-20 Clain	ns Administration &	5/5/2020	KBD	390	0.2 study analysis of claims (.2).	\$	78.00
May-20 Claim	ns Administration &	5/5/2020	KBD	390	0.2 study correspondence regarding same (.2)	\$	78.00
May-20 Clain	ns Administration & ctions	5/6/2020	KBD	390	0.1 Telephone conference with J. Wine regarding master claims spreadsheet, amounts claimed, and information gaps in claim forms (.1)	\$	39.00
May-20 Clain	ns Administration &	5/8/2020	KBD	390	0.3 exchange correspondence with J. Wine regarding claims analysis (.3)	\$	117.00
May-20 Claim	ns Administration &	5/8/2020	KBD	390	0.1 exchange correspondence with A. Porter regarding claim components (.1)	\$	39.00
May-20 Clain	ns Administration & ctions	5/11/2020	KBD	390	0.1 exchange correspondence regarding amendment of claims process motion exhibits (.1).	\$	39.00
May-20 Clain	ns Administration & ctions	5/11/2020	KBD	390	0.1 draft correspondence to M. Rachlis regarding claims process motion (.1)	\$	39.00
May-20 Clain	ns Administration &	5/11/2020	KBD	390	0.1 draft correspondence to J. Wine regarding potential document repository (.1)	\$	39.00
May-20 Clain	ns Administration &	5/12/2020	KBD	390	0.3 study draft notice of amendment of master claims exhibit and exchange correspondence regarding same (.3)	\$	117.00
May-20 Clain	ns Administration & ctions	5/13/2020	KBD	390	0.5 Exchange correspondence with A. Watychowicz regarding responses to claimant inquiries and corrections to claims spreadsheet (.5)	\$	195.00
May-20 Clain	ns Administration & ctions	5/13/2020	KBD	390	0.1 telephone conference with J. Wine regarding claims analysis (.1)	\$	39.00
May-20 Clain	ns Administration & ctions	5/14/2020	KBD	390	0.2 study claims review update (.2).	\$	78.00
May-20 Clain	ctions ns Administration & ctions	5/15/2020	KBD	390	0.2 Exchange correspondence with J. Wine regarding claims review, unsecured claims, and process (.2)	\$	78.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 84 of 157 PageID #:65117

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
	Keeper	Rate	Hours	Descripti on	Cost		
•	aims Administration & ojections	5/21/2020	KBD	390	0.3 Work on analysis of rollover issues with J. Wine and A. Watychowicz relating to submitted claims and updating information on master claims spreadsheet (.3)	\$	117.00
	aims Administration & ojections	5/21/2020	KBD	390	1 draft responses to claimants regarding various aspect of claims submissions and claims process and communicate with A. Watychowicz relating to same (1.0)	\$	390.00
May-20 Cl	aims Administration & ojections	5/21/2020	KBD	390	0.2 further work with J. Wine on claims relating to rollover issue and presenting claims spreadsheet in alternate formats (.2)	\$	78.00
May-20 Cl	aims Administration &	5/22/2020	KBD	390	0.2 exchange correspondence with J. Wine regarding claims spreadsheet and nature of claims (.2)	\$	78.00
May-20 Cl	aims Administration &	5/22/2020	KBD	390	0.1 exchange correspondence with J. Wine regarding document repository vendor (.1).	\$	39.00
May-20 Cl	aims Administration & ojections	5/26/2020	KBD	390	0.5 work on responses to various claimants and review of analysis for claims (.5).	\$	195.00
May-20 Cl	aims Administration & ojections	5/27/2020	KBD	390	0.1 review correspondence regarding potential document repository (.1)	\$	39.00
May-20 Cl	aims Administration &	5/28/2020	KBD	390	0.2 review potential terms for agreement relating to document repository (.2)	\$	78.00
May-20 Cl	aims Administration &	5/28/2020	KBD	390	0.1 attention to correspondence with claimant's counsel regarding updated claims spreadsheet (.1).	\$	39.00
May-20 Cl	aims Administration & bjections	5/29/2020	KBD	390	2.3 Attention to communication from claimants (2.3)	\$	897.00
May-20 Cl	aims Administration & bjections	5/29/2020	KBD	390	0.1 exchange correspondence with J. Wine regarding claims process (.1)	\$	39.00
May-20 Cl	aims Administration &	5/29/2020	KBD	390	0.1 work on potential document vendor with J. Wine (.1)	\$	39.00
	siness Operations	5/5/2020	AW	140	0.9 Attention to email from K. Duff regarding and work on draft response brief.	\$	126.00
May-20 Cl	aims Administration & ojections	5/1/2020	AW	140	0.1 attention to questions from claims vendor regarding claimant, research, and respond to same (.1)	\$	14.00
May-20 Cl	aims Administration & ojections	5/1/2020	JRW	260	0.7 Respond to questions from claims vendor regarding revisions to claims database (.7)	\$	182.00
May-20 Cl	aims Administration &	5/1/2020	JRW	260	3.9 analyze rollover claims and related revision of master claims spreadsheet and update information in database (3.9).	\$	1,014.00
May-20 Cl	aims Administration &	5/2/2020	JRW	260	2.3 Continued analysis of rollover claims and related revision of master claims spreadsheet and updating of information in database (2.3)	\$	598.00
May-20 Cl	aims Administration &	5/2/2020	JRW	260	0.4 prepare summary of rollover claims (.4).	\$	104.00
May-20 Cl	aims Administration & ojections	5/3/2020	MR	390	0.3 Attention to issues on components of claims library and claims process.	\$	117.00
May-20 Cl	aims Administration &	5/4/2020	AW	140	0.8 supplement master claims sheet with numerous funds coding and review claimant's submission (.8)	\$	112.00
May-20 Cl	aims Administration &	5/4/2020	JRW	260	0.2 related review and revision of form responses to frequently asked questions (.2)	\$	52.00
May-20 Cl	aims Administration & ojections	5/4/2020	JRW	260	0.4 correspond with claims vendor regarding numbering of claims against funds and prepare spreadsheet regarding same (.4)	\$	104.00
May-20 Cl	aims Administration & ojections	5/4/2020	JRW	260	0.1 confer with A. Watychowicz regarding rollover claims (.1)	\$	26.00
May-20 Cl	aims Administration &	5/4/2020	JRW	260	0.9 analyze proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (.9)	\$	234.00
May-20 Cl	aims Administration &	5/4/2020	JRW	260	5.9 conduct analysis of submitted claims to prepare estimates of number of claims and aggregate amounts by property (5.9).	\$	1,534.00
May-20 Cl	aims Administration & bjections	5/5/2020	AW	140	0.5 review exhibit filed with claims motion to confirm what claims should be included on amended exhibit and email exchange with J. Wine regarding same (.5)	\$	70.00
May-20 Cl	aims Administration & bjections	5/5/2020	AW	140	0.6 start working on draft amended exhibit related to claims motion (.6).	\$	84.00
May-20 Cl	aims Administration &	5/5/2020	ED	390	0.6 Call with J. Wine to discuss work on claims (.6)	\$	234.00
May-20 Cl	aims Administration & ojections	5/5/2020	ED	390	0.3 ;and email correspondence regarding summary information relating to same (.3).	\$	117.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 85 of 157 PageID #:65118

Entry Date Time	Time Keeper	Task	Task	Task Assessment Category	Ob	jection
Keeper	Rate	Hours	Descripti on	Cost		
May-20 Claims Administration & Objections	5/5/2020	JRW	260	0.4 Finalize analysis of submitted claims to prepare estimates of number of claims and aggregate amounts by property (.4)	\$	104.00
May-20 Claims Administration & Objections	5/5/2020	JRW	260	0.6 telephone conference with E. Duff regarding claims (.6)	\$	156.00
May-20 Claims Administration & Objections	5/5/2020	JRW	260	0.2 correspondence to K. Duff regarding results of analysis to estimate aggregate claims by property (.2)	\$	52.00
May-20 Claims Administration & Objections	5/5/2020	JRW	260	2.1 study asset portfolio, mortgage loan summary, and proof of claim, and update records regarding institutional lender claims (2.1)	\$	546.00
May-20 Claims Administration & Objections	5/5/2020	JRW	260	0.3 analyze proof of claim form and supporting documents for claimant (.3)	\$	78.00
May-20 Claims Administration & Objections	5/5/2020	JRW	260	0.2 telephone conference with K. Duff regarding claims analysis (.2)	\$	52.00
May-20 Claims Administration & Objections	5/5/2020	JRW	260	0.3 email exchange with A. Watychowicz regarding amended exhibit 1 (.3)	\$	78.00
May-20 Claims Administration & Objections	5/5/2020	JRW	260	0.1 correspondence to claims vendor regarding data missing from claim appendix (.1)	\$	26.00
May-20 Claims Administration & Objections	5/5/2020	JRW	260	1 study proofs of claim and respond to questions from claims vendor regarding requested updates to database (1.0).	\$	260.00
May-20 Claims Administration & Objections	5/6/2020	AW	140	2.8 Review claims and update master spreadsheet with claim numbers and additional information (2.8)	\$	392.00
May-20 Claims Administration & Objections	5/6/2020	AW	140	0.4 communicate with J. Wine regarding issues with database, claimants, and revisions to master spreadsheet (.4)	\$	56.00
May-20 Claims Administration & Objections	5/6/2020	AW	140	3.8 continue revisions to master spreadsheet based on review of claims for claimants (3.8)	\$	532.00
May-20 Claims Administration & Objections	5/6/2020	AW	140	0.1 respond to emails from claimants (.1).	\$	14.00
May-20 Claims Administration & Objections	5/6/2020	JRW	260	0.3 Confer with claims vendor regarding updates to claims database (.3)	\$	78.00
May-20 Claims Administration & Objections	5/6/2020	JRW	260	0.2 analyze proof of claim form and supporting documents, revise master claims spreadsheet, and update information in claims database for claimant (.2)	\$	52.00
May-20 Claims Administration & Objections	5/6/2020	JRW	260	0.2 confer with A. Watychowicz regarding generating amended exhibit to claims process motion and related revisions to master claims spreadsheet (.2)	\$	52.00
May-20 Claims Administration & Objections	5/6/2020	JRW	260	0.1 confer with A. Watychowicz regarding institutional lender claims (.1)	\$	26.00
May-20 Claims Administration & Objections	5/6/2020	JRW	260	0.1 exchange correspondence with claims vendor regarding database records for claimant (.1)	\$	26.00
May-20 Claims Administration & Objections	5/6/2020	JRW	260	0.7 review correspondence, proof of claim and supporting documentation from claimant and update master claims spreadsheet and claims database (.7)	\$	182.00
May-20 Claims Administration & Objections	5/6/2020	JRW	260	0.3 telephone conference with A. Watychowicz regarding multiple issues related to claims (.3)	\$	78.00
May-20 Claims Administration & Objections	5/7/2020	JRW	260	0.2 Exchange correspondence with claims vendor regarding total number of submitted claims (.2)	\$	52.00
May-20 Claims Administration & Objections	5/7/2020	JRW	260	0.2 investigate claim submission and work with A. Watychowicz and K. Duff to respond to claimant inquiry (.2).	\$	52.00
May-20 Claims Administration & Objections	5/7/2020	MR	390	0.1 attention to various claims issues (.1).	\$	39.00
May-20 Claims Administration & Objections	5/8/2020	AW	140	0.1 attention to communications regarding claims process and number of submitted claims (.1).	\$	14.00
May-20 Claims Administration & Objections	5/8/2020	JRW	260	0.1 Exchange correspondence with claims vendor regarding claims submissions received (.1)	\$	26.00
May-20 Claims Administration & Objections	5/8/2020	JRW	260	0.5 analyze number of claims received and related report to K. Duff (.5)	\$	130.00
May-20 Claims Administration & Objections	5/11/2020	AW	140	0.3 communicate with J. Wine regarding additional claims (.3).	\$	42.00
May-20 Claims Administration & Objections	5/11/2020	JRW	260	0.9 Analyze claims and related telephone conference with A. Watychowicz (.9)	\$	234.00
May-20 Claims Administration & Objections	5/11/2020	JRW	260	0.6 update records in claims database for various claimants (.6)	\$	156.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 86 of 157 PageID #:65119

Entry Date Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
Keeper	Rate	Hours	Descripti on	Cost		
May-20 Claims Administration & Objections	5/11/2020	JRW	260	0.4 related exchange of correspondence with claims vendor regarding revisions to claims records and supplementation of documentation in claims database (.4)	\$	104.00
May-20 Claims Administration & Objections	5/11/2020	JRW	260	0.3 review pleadings and draft correspondence to K. Duff and M. Rachlis regarding notice of amended exhibits (.3)	\$	78.00
May-20 Claims Administration & Objections	5/11/2020	JRW	260	0.2 correspond with claims vendor regarding fields for export of data for all claims records (.2)	\$	52.00
May-20 Claims Administration & Objections	5/12/2020	AW	140	0.3 request substantial revisions in claims portal (.3)	\$	42.00
May-20 Claims Administration & Objections	5/12/2020	AW	140	1.3 continue review of claims and revisions to master claims sheet (1.3)	\$	182.00
May-20 Claims Administration & Objections	5/12/2020	AW	140	0.1 review notice of filing of amended exhibit to claims motion (.1).	\$	14.00
May-20 Claims Administration & Objections	5/12/2020	AW	140	0.3 call with J. Wine regarding same (.3)	\$	42.00
May-20 Claims Administration & Objections	5/12/2020	JRW	260	0.7 Exchange correspondence with claims vendor regarding revisions to claims records and supplementation of documentation in claims database and related review of records (.7)	\$	182.00
May-20 Claims Administration & Objections	5/12/2020	JRW	260	0.8 attention to responding to claimant inquiries (.8)	\$	208.00
May-20 Claims Administration & Objections	5/12/2020	JRW	260	0.2 telephone conference and email exchange with claims vendor regarding listing of claims in database (.2)	\$	52.00
May-20 Claims Administration & Objections	5/12/2020	JRW	260	0.9 attention to creation of amended master claims exhibit and related communications with S. Zjalic and A. Watychowicz (.9)	\$	234.00
May-20 Claims Administration & Objections	5/12/2020	JRW	260	0.5 draft notice of filing amended exhibits to claims process motion (.5).	\$	130.00
May-20 Claims Administration & Objections	5/12/2020	SZ	110	5.6 Completed review of numerous entries from master list against claims forms.	\$	616.00
May-20 Claims Administration & Objections	5/13/2020	AW	140	0.1 request database update as per claimant request (.1)	\$	14.00
May-20 Claims Administration & Objections	5/13/2020	AW	140	0.3 communicate with K. Duff regarding inquiries from claimants and requests to update claims (.3)	\$	42.00
May-20 Claims Administration & Objections	5/13/2020	AW	140	0.2 communicate with claims vendor regarding upload of additional claims and means to transfer (.2).	\$	28.00
May-20 Claims Administration & Objections	5/13/2020	JRW	260	2.1 Attention to reconciling claims in database with master claims spreadsheet (2.1)	\$	546.00
May-20 Claims Administration & Objections	5/13/2020	JRW	260	0.5 review trade creditor, independent contractor and "other" claims (.5)	\$	130.00
May-20 Claims Administration & Objections	5/13/2020	SZ	110	7.5 Further review of master claims list against claims forms.	\$	825.00
May-20 Claims Administration & Objections	5/14/2020	AW	140	0.2 communicate with claims vendor regarding submitted claims and related coding (.2)	\$	28.00
May-20 Claims Administration & Objections	5/14/2020	AW	140	0.2 communicate with J. Wine regarding issue with claim and solution (.2).	\$	28.00
May-20 Claims Administration & Objections	5/14/2020	JRW	260	0.2 Confer with claims vendor regarding claims questions (.2)	\$	52.00
May-20 Claims Administration & Objections	5/14/2020	JRW	260	0.8 research regarding multiple claims submitted by claimant and related email regarding revisions to claims database (.8)	\$	208.00
May-20 Claims Administration & Objections	5/14/2020	JRW	260	4.5 continued attention to reconciling claims in database with master claims spreadsheet (4.5)	\$	1,170.00
May-20 Claims Administration & Objections	5/14/2020	JRW	260	0.5 related conferences with A. Watychowicz and claims vendor (.5)	\$	130.00
May-20 Claims Administration & Objections	5/14/2020	JRW	260	0.3 prepare summary of claims reconciliation progress and remaining issues (.3).	\$	78.00
May-20 Claims Administration & Objections	5/15/2020	AW	140	0.1 Communicate with K. Duff regarding submitted claim (.1)	\$	14.00
May-20 Claims Administration & Objections	5/15/2020	AW	140	1.2 start review of unique claims without assigned property (1.2)	\$	168.00
May-20 Claims Administration & Objections	5/15/2020	JRW	260	0.6 Exchange correspondence with claims vendor regarding additional revisions to claims database for individual claims (.6)	\$	156.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 87 of 157 PageID #:65120

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	ojection
May-20 Claims Ad		5/15/2020	JRW	on 260	0.4 prepare analysis regarding treatment of claims against former EquityBuild properties and other unsecured	\$	104.00
Objections	3				claims and related telephone conference with K. Duff (.4)	•	
May-20 Claims Ad Objections		5/15/2020	JRW	260	0.7 conferences with A. Watychowicz regarding analysis of claims in database (.7)	\$	182.00
May-20 Claims Ad Objections		5/15/2020	JRW	260	0.1 attention to responding to claimant inquiries (.1)	\$	26.00
May-20 Claims Ad Objections	Iministration &	5/15/2020	JRW	260	0.8 study claim form, supporting documentation, and responsive email from A. Porter, related conference with K. Duff and draft follow-up response to claimant (.8)	\$	208.00
May-20 Claims Ad Objections	Iministration &	5/15/2020	JRW	260	1.4 review claims in database, revise master claims spreadsheet, and update information in claims database for multiple claimants (1.4).	\$	364.00
May-20 Claims Ad Objections	Iministration &	5/18/2020	AW	140	0.4 Attention to emails from claimants, draft email responses for K. Duff's approval, and respond to claimants (.4)	\$	56.00
May-20 Claims Ad Objections	Iministration &	5/18/2020	AW	140	0.1 communicate with claims vendor regarding access to database (.1)	\$	14.00
May-20 Claims Ad Objections	Iministration &	5/18/2020	AW	140	2.3 continue analysis of proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (2.3).	\$	322.00
May-20 Claims Ad Objections	Iministration &	5/18/2020	JRW	260	0.2 investigate claimant inquiry an related email to A. Porter (.2)	\$	52.00
May-20 Claims Ad Objections	Iministration &	5/18/2020	JRW	260	0.2 review draft confidentiality order and related correspondence with M. Rachlis and counsel for claimant (.2)	\$	52.00
May-20 Claims Ad Objections	Iministration &	5/18/2020	JRW	260	0.2 review and revise responses to claimant inquiries (.2)	\$	52.00
May-20 Claims Ad Objections	Iministration &	5/18/2020	JRW	260	0.1 correspondence with claims vendor regarding checked out documents (.1)	\$	26.00
May-20 Claims Ad Objections	Iministration &	5/18/2020	JRW	260	2.4 review claims in database, revise master claims spreadsheet, and update information in claims database for multiple claimants (2.4).	\$	624.00
May-20 Claims Ad Objections	Iministration &	5/19/2020	AW	140	0.2 email exchange with claims vendor regarding updates requested by claimants (.2)	\$	28.00
May-20 Claims Ad Objections	Iministration &	5/19/2020	AW	140	1.3 continue analysis of proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (1.3)	\$	182.00
May-20 Claims Ad Objections	Iministration &	5/19/2020	AW	140	0.1 email exchange with claims vendor regarding additional updates to database (.1).	\$	14.00
May-20 Claims Ad Objections	Iministration &	5/19/2020	JRW	260	2 Review claims in database, revise master claims spreadsheet, and update information in claims database for multiple claimants (2.0)	\$	520.00
May-20 Claims Ad Objections	Iministration &	5/19/2020	JRW	260	0.1 correspondence with claims vendor regarding database record for claimant (.1)	\$	26.00
May-20 Claims Ad Objections	Iministration &	5/19/2020	JRW	260	0.2 exchange correspondence with counsel for institutional lender and related review of revisions to amended confidentiality order (.2).	\$	52.00
May-20 Claims Ad Objections	Iministration &	5/20/2020	AW	140	0.2 Correspond with claims vendor regarding requested revisions to database (.2)	\$	28.00
May-20 Claims Ad Objections	Iministration &	5/20/2020	AW	140	0.4 attention to email from claimants, correspond with K. Duff regarding same, and respond to claimants (.4)	\$	56.00
May-20 Claims Ad Objections	Iministration &	5/20/2020	AW	140	1.4 continue analysis of proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (1.4)	\$	196.00
May-20 Claims Ad Objections	Iministration &	5/20/2020	AW	140	0.9 communicate with J. Wine regarding amended exhibit to claims motion, revisions to amended exhibit, and generate same (.9)	\$	126.00
May-20 Claims Ad Objections	Iministration &	5/20/2020	AW	140	0.4 prepare exhibits to notice of filing of amended exhibits and revise certificate of service (.4)	\$	56.00
May-20 Claims Ad Objections	Iministration &	5/20/2020	AW	140	0.5 finalize notice, file with court, and serve as per service list (.5)	\$	70.00
May-20 Claims Ad Objections	Iministration &	5/20/2020	AW	140	0.1 email K. Duff regarding claimants' inquiries related to notice of filing of amended exhibits (.1).	\$	14.00
May-20 Claims Ad Objections	Iministration &	5/20/2020	JRW	260	0.6 telephone conferences with A. Watychowicz regarding master claims exhibit (.6)	\$	156.00
May-20 Claims Ad Objections	Iministration &	5/20/2020	JRW	260	0.4 proof and finalize amended exhibit 1 to claims process motion (.4)	\$	104.00
May-20 Claims Ad Objections	Iministration &	5/20/2020	JRW	260	0.2 revisions to proposed confidentiality order (.2)	\$	52.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 88 of 157 PageID #:65121

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
			on			
May-20 Claims Administration & Objections	5/20/2020	JRW	260	0.2 and related exchange of correspondence with SEC (.2)	\$	52.00
May-20 Claims Administration & Objections	5/20/2020	JRW	260	0.2 correspondence with K. Duff and A. Watychowicz regarding claim (.2)	\$	52.00
May-20 Claims Administration & Objections	5/20/2020	JRW	260	0.5 revise, finalize and file notice of filing amended exhibits to claims process motion (.5)	\$	130.00
May-20 Claims Administration & Objections	5/21/2020	AW	140	3.1 Attention to emails from claimants in response to recently filed notice of filing of amended exhibits, attention to claims, email exchanges with K. Duff and J. Wine regarding responses, and respond to claimants (3.1)	\$	434.00
May-20 Claims Administration & Objections	5/21/2020	AW	140	1.8 continue analysis of proof of claim forms, supporting documents, and related EquityBuild records, revise master claims spreadsheet, and update information in claims database for claimants (1.8)	\$	252.00
May-20 Claims Administration & Objections	5/21/2020	AW	140	0.2 communicate with claims vendor regarding updates to database (.2).	\$	28.00
May-20 Claims Administration & Objections	5/21/2020	JRW	260	1.2 attention to drafting and revision of responses to multiple claimant inquiries (1.2)	\$	312.00
May-20 Claims Administration & Objections	5/21/2020	JRW	260	0.4 telephone conference with K. Duff and A. Watychowicz regarding treatment of rollover claims and strategy for responding to claimant inquiries (.4).	\$	104.00
May-20 Claims Administration & Objections	5/22/2020	AW	140	O.6 Attention to emails from claimants in response to recently filed notice of filing of amended exhibits, attention to their claims, email exchanges with K. Duff and J. Wine regarding responses, and respond to claimants (.6)	\$	84.00
May-20 Claims Administration & Objections	5/22/2020	AW	140	2.4 continued revisions to master claims spreadsheet based on review of submitted claims (2.4).	\$	336.00
May-20 Claims Administration & Objections	5/22/2020	JRW	260	0.9 review claim submissions to confirm updated in master spreadsheet (.9)	\$	234.00
May-20 Claims Administration & Objections	5/22/2020	JRW	260	0.5 work with A. Watychowicz on formatting and finalizing master claims exhibit (.5).	\$	130.00
May-20 Claims Administration & Objections	5/26/2020	AW	140	0.1 Communicate with claims vendor regarding revisions to database (.1)	\$	14.00
May-20 Claims Administration & Objections	5/26/2020	AW	140	0.1 communicate with K. Duff regarding amended exhibit (.1)	\$	14.00
May-20 Claims Administration & Objections	5/26/2020	JRW	260	0.9 study proof of claim and supporting documentation from claimant and related correspondence with K. Duff regarding inquiry from same (.9).	\$	234.00
May-20 Claims Administration & Objections	5/27/2020	AW	140	5.9 Attention to emails from claimants, revisions to master claims list, request updates to database, work on responses to emails, and respond to emails from claimants.	\$	826.00
May-20 Claims Administration & Objections	5/27/2020	JRW	260	0.2 related telephone conference with A. Watychowicz (.2)	\$	52.00
May-20 Claims Administration & Objections	5/27/2020	JRW	260	0.2 confer with A. Watychowicz regarding buyouts and loan purchases (.2)	\$	52.00
May-20 Claims Administration & Objections	5/27/2020	JRW	260	0.6 exchange correspondence with K. Duff and A. Watychowicz regarding entity bringing claims and related review of proof of claim (.6)	\$	156.00
May-20 Claims Administration & Objections	5/27/2020	JRW	260	0.4 research regarding e- discovery databases (.4)	\$	104.00
May-20 Claims Administration & Objections	5/27/2020	JRW	260	0.3 telephone conference with potential vendor regarding demo database (.3)	\$	78.00
May-20 Claims Administration & Objections	5/27/2020	JRW	260	0.7 related testing of demo database (.7)	\$	182.00
May-20 Claims Administration & Objections	5/27/2020	JRW	260	0.1 email exchange with K. Duff regarding potential contract with e-discovery vendor (.1).	\$	26.00
May-20 Claims Administration & Objections	5/28/2020	AW	140	0.4 Work with K. Duff on responses to claimants' inquiries.	\$	56.00
May-20 Claims Administration & Objections	5/28/2020	JRW	260	0.4 Exchange correspondence regarding response to claimant inquiry and related review of claims documentation (.4)	\$	104.00
May-20 Claims Administration & Objections	5/28/2020	JRW	260		\$	26.00
May-20 Claims Administration & Objections	5/28/2020	JRW	260	0.4 telephone conference with potential e-discovery vendor regarding e-discovery platform (.4)	\$	104.00
May-20 Claims Administration & Objections	5/28/2020	JRW	260	0.3 review statement of work and email exchange with potential claims repository vendor regarding terms of agreement (.3)	\$	78.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 89 of 157 PageID #:65122

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	0	bjection
May-20 Claims Administration & Objections	5/28/2020	JRW	on 260	0.9 review master services agreement from potential e- discovery vendor and related correspondence regarding terms (.9)	\$	234.00
May-20 Claims Administration & Objections	5/28/2020	JRW	260	0.4 telephone conference with vendor (.4).	\$	104.00
May-20 Claims Administration & Objections	5/29/2020	AW	140	6.7 Work on responses and respond to emails from claimants regarding master claims list, and request updates to claims database (6.7)	\$	938.00
May-20 Claims Administration & Objections	5/29/2020	JRW	260	0.4 Telephone conference with potential email discovery vendor regarding project needs (.4)	\$	104.00
May-20 Claims Administration & Objections	5/29/2020	JRW	260	0.4 telephone conference with potential document repository vendor regarding logistics and statement of work (.4)	\$	104.00
May-20 Claims Administration & Objections	5/29/2020	JRW	260	0.4 review inquiries from multiple claimants and related exchange of draft responses with A. Watychowicz and K. Duff (.4).	\$	104.00
May-20 Claims Administration & Objections	5/29/2020	MR	390	0.4 Attention to response to claims issues (.4)	\$	156.00
June-20 Claims Administration & Objections	6/1/2020	KBD	390	0.6 attention to responses to claimants' inquiries (.6).	\$	234.00
June-20 Claims Administration & Objections	6/2/2020	KBD	390	0.7 Work on responses to claimant inquiries (.7)	\$	273.00
June-20 Claims Administration & Objections	6/3/2020	KBD	390	0.8 Work on various responses to claimants regarding claims process, timing, and various related issues (.8)	\$	312.00
June-20 Claims Administration & Objections	6/3/2020	KBD	390	0.3 exchange correspondence with M. Rachlis regarding process for claims on properties (.3)	\$	117.00
June-20 Claims Administration & Objections	6/3/2020	KBD	390	0.9 work on claims process with J. Wine (.9)	\$	351.00
June-20 Claims Administration & Objections	6/3/2020	KBD	390	0.5 attention to claimants' inquiries (.5)	\$	195.00
June-20 Claims Administration & Objections	6/4/2020	KBD	390	0.4 Work on responses to various claimants' inquiries (.4)	\$	156.00
June-20 Claims Administration & Objections	6/4/2020	KBD	390	0.1 review correspondence to claims vendor regarding invoice (.1).	\$	39.00
June-20 Claims Administration & Objections	6/5/2020	KBD	390	0.3 attention to responses to claimants' inquiries (.3)	\$	117.00
June-20 Claims Administration & Objections	6/8/2020	KBD	390	0.2 work on claims vendor assembly of institutional lender documents including telephone conference with A. Watychowicz (.2)	\$	78.00
June-20 Claims Administration & Objections	6/8/2020	KBD	390	0.2 study information regarding analysis of claims on properties (.2)	\$	78.00
June-20 Claims Administration & Objections	6/10/2020	KBD	390	0.7 telephone conference with A. Watychowicz, J. Wine, and M. Rachlis regarding claims document logistics for providing to claimants and work with claims vendors and review correspondence and information regarding same (.7).	\$	273.00
June-20 Claims Administration & Objections	6/11/2020	KBD	390	0.1 review draft correspondence regarding claim correction (.1)	\$	39.00
June-20 Claims Administration & Objections	6/11/2020	KBD	390	0.2 exchange correspondence regarding claims conferences (.2)	\$	78.00
June-20 Claims Administration & Objections	6/11/2020	KBD	390	0.2 attention to communications relating to investigation of claims (.2)	\$	78.00
June-20 Claims Administration & Objections	6/11/2020	KBD	390	0.4 attention to receiver role and summary proceedings (.4).	\$	156.00
June-20 Claims Administration & Objections	6/12/2020	KBD	390	0.1 exchange correspondence with potential document repository vendor (.1)	\$	39.00
June-20 Claims Administration & Objections	6/14/2020	KBD	390	5.2 Draft reply in support of claims process motion.	\$	2,028.00
June-20 Claims Administration & Objections	6/16/2020	KBD	390	0.1 draft correspondence to J. Wine and A. Watychowicz regarding EB employees and claims (.1).	\$	39.00
June-20 Claims Administration & Objections	6/17/2020	KBD	390	1.8 Study and revise draft reply brief regarding claims process (1.8)	\$	702.00
June-20 Claims Administration & Objections	6/17/2020	KBD	390	0.1 exchange correspondence with A. Watychowicz regarding filed claims [employees] (.1)	\$	39.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 90 of 157 PageID #:65123

Entry Date Time	9	Time Keeper	Task	Task	Task Assessment Category	0	bjection
Keep	er	Rate	Hours	Descripti on	Cost		
June-20 Claims Administrat	tion &	6/17/2020	KBD	390	0.1 exchange correspondence with claimant counsel regarding insurance certificate and draft correspondence requesting same (.1)	\$	39.00
June-20 Claims Administrat Objections	tion &	6/18/2020	KBD	390	5.7 Study and revise claims process reply brief (5.7)	\$	2,223.00
June-20 Claims Administrat Objections	tion &	6/18/2020	KBD	390	0.2 exchange correspondence with A. Watychowicz regarding claims data (.2)	\$	78.00
June-20 Claims Administrat Objections	tion &	6/18/2020	KBD	390	0.1 attention communications with claimant (.1).	\$	39.00
June-20 Claims Administrat Objections	tion &	6/19/2020	KBD	390	0.2 exchange correspondence with A. Watychowicz and J. Wine claim statistics (.2)	\$	78.00
June-20 Claims Administrat Objections	tion &	6/20/2020	KBD	390	4.7 Draft and revise claims motion reply and exchange correspondence with M. Rachlis regarding same (4.7)	\$	1,833.00
June-20 Claims Administrat	tion &	6/21/2020	KBD	390	2.3 Draft and revise claims motion reply.	\$	897.00
Objections June-20 Claims Administrat	tion &	6/22/2020	KBD	390	4 Work on claims motion reply with M. Rachlis, J. Wine and A. Watychowicz (4.0)	\$	1,560.00
Objections June-20 Claims Administrat	tion &	6/23/2020	KBD	390	0.2 exchange correspondence with E. Duff and M. Rachlis regarding accounting reports and insurance	\$	78.00
Objections June-20 Claims Administrat	tion &	6/24/2020	KBD	390	adjustments (.2) 1.2 Telephone conference with and study correspondence from M. Rachlis and J. Wine regarding lender motion	\$	468.00
Objections June-20 Asset Disposition		6/1/2020	JR	140	for oral argument, reimbursement motion, and claims process motion (1.2) 0.3 research information related to same and communication with K. Pritchard regarding same (.3).	\$	42.00
June-20 Asset Disposition		6/5/2020	AEP	390	0.4 review copies of new judgments against receivership properties received from title company and begin	\$	156.00
June-20 Business Operation	ns	6/29/2020	JRW	260	updating spreadsheet of all judgments against receivership properties (.4) 0.2 Review new general notice posted on City of Chicago administrative hearings website and related	\$	52.00
June-20 Claims Administrat	tion &	6/1/2020	AW	140	correspondence to team (.2) 1.9 Attention to emails from claimants regarding Master Claims List, draft responses for K. Duff's approval, apply	\$	266.00
Objections June-20 Claims Administrat	tion &	6/1/2020	AW	140	revisions to Master Claims List and database, and respond to emails (1.9) 0.3 email exchanges with claims vendor regarding revisions to database (.3)	\$	42.00
Objections						•	
June-20 Claims Administrat Objections	tion &	6/3/2020	AW	140	0.2 email exchange with J. Wine and research regarding coding practice for claims against funds (.2)	\$	28.00
June-20 Claims Administrat Objections	tion &	6/3/2020	AW	140	0.1 request additional revisions to database (.1).	\$	14.00
June-20 Claims Administrat Objections	tion &	6/3/2020	ED	390	0.3 Review files and email correspondence relating to documents submitted by institutional lender relating to claims and email correspondence with A. Watychowicz and M. Rachlis regarding same.	\$	117.00
June-20 Claims Administrat Objections	tion &	6/3/2020	JRW	260	2.4 Investigate and correspond with K. Duff and A. Watychowicz regarding issues raised in claimant inquiries (2.4)	\$	624.00
June-20 Claims Administrat Objections	tion &	6/3/2020	JRW	260	0.1 correspond with A. Watychowicz regarding analysis of claims against properties in funds (.1)	\$	26.00
June-20 Claims Administrat Objections	tion &	6/3/2020	JRW	260	0.9 telephone conference with K. Duff regarding claimant issues, structure of EquityBuild funds, and second claims process motion (.9)	\$	234.00
June-20 Claims Administrat	tion &	6/4/2020	JRW	260	0.5 Research regarding claims process and related review of prior briefing and orders (.5)	\$	130.00
Objections June-20 Claims Administrat Objections	tion &	6/4/2020	JRW	260	0.1 confer with A. Watychowicz regarding documentation supporting claims from institutional lender (.1).	\$	26.00
June-20 Claims Administrat Objections	tion &	6/5/2020	AW	140	0.3 Communicate with J. Wine regarding claims and native sheets submitted with claims and supporting documentation (.3)	\$	42.00
June-20 Claims Administrat	tion &	6/5/2020	AW	140	1.3 review claims and further communication with J. Wine regarding same (1.3)	\$	182.00
Objections June-20 Claims Administrat Objections	tion &	6/5/2020	JRW	260	0.7 Study claims and work with A. Watychowicz on updating claims database (.7)	\$	182.00
June-20 Claims Administrat Objections	tion &	6/8/2020	AW	140	0.3 email exchanges with claims vendor regarding revisions to database (.3)	\$	42.00
June-20 Claims Administrat Objections	tion &	6/8/2020	AW	140	0.8 prepare additional files for upload to database and share with claims vendor (.8)	\$	112.00
June-20 Claims Administrat Objections	tion &	6/8/2020	JRW	260	0.4 Review claim forms and exchange correspondence with A. Watychowicz and K. Duff regarding format of production (.4)	\$	104.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 91 of 157 PageID #:65124

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	0	bjection
	ims Administration & ections	6/8/2020	JRW	on 260	1.3 attention to proposed process for claims on properties (1.3)	\$	338.00
June-20 Cla	ims Administration & ections	6/8/2020	JRW	260	0.2 update master spreadsheet for claimant and related correspondence with A. Watychowicz (.2)	\$	52.00
June-20 Cla	ims Administration &	6/8/2020	JRW	260	0.2 exchange correspondence with A. Watychowicz and K. Duff regarding notice to counsel for institutional	\$	52.00
June-20 Cla	ections ims Administration &	6/8/2020	JRW	260	lenders regarding correction to master claims spreadsheet and related review of signature blocks (.2) 0.8 study objections to claims process motion (.8).	\$	208.00
June-20 Cla	ections ims Administration &	6/9/2020	JRW	260	0.2 review proof of claim and related correspondence with A. Porter and K. Duff (.2)	\$	52.00
June-20 Cla	ections ims Administration &	6/10/2020	AW	140	0.2 Email exchanges with claims vendor regarding revisions and supplements to lenders' claims and extraction of	\$	28.00
June-20 Cla	ections ims Administration &	6/10/2020	AW	140	Excel files for depository purpose (.2) 0.7 conference with M. Rachlis, K. Duff, and J. Wine regarding claims, database, and upcoming projects (.7)	\$	98.00
June-20 Cla	ections ims Administration &	6/10/2020	AW	140	0.2 call with J. Wine regarding processing of voluminous production from claimant (.2).	\$	28.00
June-20 Cla	ections ims Administration &	6/10/2020	JRW	260	0.6 Conference call with K. Duff, M. Rachlis and A. Watychowicz regarding handling of spreadsheets and	\$	156.00
June-20 Cla	ections ims Administration &	6/10/2020	JRW	260	claimant's supporting documentation in claims database (.6) 0.2 review claim forms and spreadsheet in preparation for same (.2)	\$	52.00
June-20 Cla	ections ims Administration & ections	6/10/2020	JRW	260	0.2 follow-up call with A. Watychowicz regarding claims database issues (.2).	\$	52.00
June-20 Cla	ims Administration & ections	6/11/2020	AW	140	2.3 start processing claimants documents, convert to pdf files, Bates label, and start indexing (2.3)	\$	322.00
June-20 Cla	ims Administration & ections	6/11/2020	AW	140	0.2 email M. Rachlis materials relating to preparation of reply in support of claims motion (.2).	\$	28.00
June-20 Cla	ims Administration & ections	6/11/2020	JRW	260	0.1 Confer with A. Watychowicz regarding claims documentation (.1)	\$	26.00
June-20 Cla	ims Administration & ections	6/11/2020	JRW	260	1 study objections to claims process motion (1.0)	\$	260.00
June-20 Cla	ims Administration & ections	6/11/2020	JRW	260	2.2 work with K. Duff and M. Rachlis on reply brief in support of claims process motion (2.2).	\$	572.00
June-20 Cla	ims Administration & ections	6/12/2020	AW	140	0.1 Correspond with claimant's counsel regarding removal from mailing list (.1)	\$	14.00
June-20 Cla	ims Administration & ections	6/12/2020	AW	140	1.2 correspond with K. Duff and J. Wine regarding responses to claimants (1.2)	\$	168.00
June-20 Cla	ims Administration & ections	6/12/2020	AW	140	0.1 communicate with J. Wine regarding issues with supporting documents from claimant (.1).	\$	14.00
June-20 Cla	ims Administration & ections	6/12/2020	JRW	260	1.7 Legal research for reply to motion for approval of claims process (1.7)	\$	442.00
June-20 Cla	ims Administration & ections	6/12/2020	JRW	260	1 correspond with A. Watychowicz and K. Duff regarding responding to claimant inquiries (1.0)	\$	260.00
June-20 Cla	ims Administration & ections	6/12/2020	MR	390	1 Participate in meeting regarding claims issues.	\$	390.00
June-20 Cla	ims Administration & ections	6/13/2020	MR	390	5.5 Work on claims process response brief.	\$	2,145.00
June-20 Cla	ims Administration & ections	6/14/2020	MR	390	6 Work on claims process response brief.	\$	2,340.00
June-20 Cla	ims Administration & ections	6/15/2020	AW	140	0.4 Attention to emails from claimants and correspond with K. Duff and J. Wine regarding responses (.4)	\$	56.00
June-20 Cla	ims Administration & ections	6/15/2020	AW	140	0.2 respond to emails from claimants (.2)	\$	28.00
June-20 Cla	ims Administration & ections	6/15/2020	AW	140	0.1 attention to revisions in database (.1)	\$	14.00
June-20 Cla	ims Administration & ections	6/15/2020	AW	140	0.3 lengthy email to claims vendor regarding upload of voluminous supporting documents (.3).	\$	42.00
June-20 Cla	ims Administration & ections	6/15/2020	JRW	260	0.3 Research regarding claimants (.3)	\$	78.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 92 of 157 PageID #:65125

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	0	bjection
June-20 Claims Administratio Objections	n & 6/15/2020	JRW	on 260	0.8 review inquiries from claimants and related investigation and correspondence with K. Duff, A. Watychowicz and A. Porter (.8)	\$	208.00
June-20 Claims Administratio Objections	n & 6/15/2020	JRW	260	0.1 confer with A. Watychowicz regarding claims documentation (.1)	\$	26.00
June-20 Claims Administratio Objections	n & 6/15/2020	JRW	260	0.7 prepare notes regarding claims process reply brief (.7).	\$	182.00
June-20 Claims Administratio Objections	n & 6/16/2020	AW	140	0.7 attention to former EquityBuild employee list and make appropriate notes to master claims list (.7).	\$	98.00
June-20 Claims Administratio Objections	n & 6/16/2020	JRW	260	1.5 Continued legal research and drafting of reply to claims process motion.	\$	390.00
June-20 Claims Administratio Objections	n & 6/17/2020	AW	140	0.6 Further attention to former EquityBuild employee list and complete notes to master claims list and email K. Duff and J. Wine regarding same.	\$	84.00
June-20 Claims Administratio Objections	n & 6/17/2020	JRW	260	1.5 Continued drafting of reply brief for claims process motion.	\$	390.00
June-20 Claims Administratio Objections		MR	390	4.5 Further work researching and revising claim process reply brief and communications regarding same.	\$	1,755.00
June-20 Claims Administratio Objections		AW	140	1.4 Attention to email from K. Duff regarding claims statistics, work on same, and report results to K. Duff and J. Wine (1.4)	\$	196.00
June-20 Claims Administratio Objections		AW	140	0.2 attention to email from claimant and communicate with K. Duff and J. Wine regarding same and related issues (.2)		28.00
June-20 Claims Administratio Objections		AW	140	0.1 communicate with claims vendor regarding completion supporting documents upload (.1)	\$	14.00
June-20 Claims Administratio Objections		AW	140	0.3 attention to email regarding potential claimant, research regarding same, and communicate results to K. Duff and J. Wine (.3).	\$	42.00
June-20 Claims Administratio Objections		MR	390	1.4 Further work on claims process draft brief.	\$	546.00
June-20 Claims Administratio Objections		JRW	260	0.3 Communicate with K. Duff and A. Watychowicz regarding claim statistics and claimant designations (.3)	\$	78.00
June-20 Claims Administratio Objections		JRW	260	1.9 review and revise reply brief in support of claims process motion (1.9).	\$	494.00
June-20 Claims Administratio Objections		MR	390	1 Further revisions to draft claims process reply brief and follow up regarding same.	\$	390.00
June-20 Claims Administratio Objections		AW	140	1.1 Attention to reply in support of claims motion, proofread, and prepare table of authorities and table of contents (1.1)		154.00
June-20 Claims Administratio Objections		AW	140	1.1 attention to follow up email from K. Duff regarding claims statistics, work on same, and report results to K. Duff and J. Wine (1.1).	•	154.00
June-20 Claims Administratio Objections		MR	390	2.5 Further work on claims Process reply brief and follow up regarding same.	\$ \$	975.00
June-20 Claims Administratio Objections		AW	140	0.1 Attention to exchange with claimant and save to Receiver's email (.1)	\$	14.00
June-20 Claims Administratio Objections		AW	140	0.6 attention to current reply draft, proofread and email counsel regarding same (.6)	·	84.00
June-20 Claims Administratio Objections	n & 6/22/2020	AW	140	2.1 attention to final drafts, apply final revisions to brief, table of contents, and table of authorities, communicate with M. Rachlis and K. Duff regarding same, finalize reply, file with the court, and serve as per service list (2.1)	\$	294.00
June-20 Claims Administratio Objections	n & 6/22/2020	AW	140	1.4 attention to communication from claims vendor regarding claimant's submission and volume, communicate with J. Wine regarding same and research regarding difference in reported claims (1.4).	\$	196.00
June-20 Claims Administratio Objections	n & 6/22/2020	JRW	260	0.7 Correspond with claims vendor regarding file size of claims documentation in potential claims tranche and perform related calculations (.7)	\$	182.00
June-20 Claims Administratio Objections	n & 6/22/2020	JRW	260	0.4 confer with A. Watychowicz regarding Schedule A and related report to receivership team (.4)	\$	104.00
June-20 Claims Administratio Objections		JRW	260	1.9 read, revise and communicate with M. Rachlis and K. Duff regarding revision and finalization of reply brief in support of claims process motion (1.9)	\$	494.00
June-20 Claims Administratio Objections		JRW	260	0.3 review SEC response brief and related analysis to M. Rachlis and K. Duff (.3).	\$	78.00
June-20 Claims Administratio Objections	n & 6/22/2020	MR	390	6.5 Further work on claims process brief (6.5)	\$	2,535.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 93 of 157 PageID #:65126

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	ojection
June-20 Claims Administration &	6/22/2020	MR	on 390	0.3 attention to issues on claims exhibit (.3).	\$	117.00
Objections June-20 Claims Administration & Objections	6/23/2020	AW	140	0.4 email A. Porter regarding details of claims (.4)	\$	56.00
June-20 Claims Administration & Objections	6/23/2020	JRW	260	0.2 Review proof of claim submitted by claimant and related correspondence with K. Duff and A. Watychowicz (.2)	\$	52.00
June-20 Claims Administration & Objections	6/23/2020	JRW	260	0.2 work with claims vendor regarding checked out documents (.2)	\$	52.00
June-20 Claims Administration & Objections	6/23/2020	JRW	260	0.4 revise draft of second claims process motion (.4).	\$	104.00
June-20 Claims Administration & Objections	6/24/2020	JRW	260	1.4 Continued analysis of claims against properties and prepare notes and spreadsheet regarding same (1.4)	\$	364.00
June-20 Claims Administration & Objections	6/24/2020	JRW	260	0.8 extended telephone conference with K. Duff and M. Rachlis regarding claims process and framing reports (.8)	\$	208.00
June-20 Claims Administration & Objections	6/24/2020	JRW	260	0.6 study claims and prepare notes regarding same (.6).	\$	156.00
June-20 Claims Administration & Objections	6/24/2020	MR	390	0.5 Review motion for oral argument (.5)	\$	195.00
June-20 Claims Administration & Objections	6/24/2020	MR	390	1.2 conferences with K. Duff and J. Wine regarding same and additional motions (1.2).	\$	468.00
June-20 Claims Administration & Objections	6/26/2020	AW	140	0.5 updates to master claims sheet and property addresses as per J. Wine's instructions (.5).	\$	70.00
June-20 Claims Administration & Objections	6/26/2020	JRW	260	0.6 Review claims process motion and prepare notes regarding format for framing reports.	\$	156.00
June-20 Claims Administration & Objections	6/29/2020	JRW	260	0.1 Correspond with K. Duff regarding late claim submission (.1)	\$	26.00
June-20 Claims Administration & Objections	6/29/2020	JRW	260	0.6 telephone conference with A. Watychowicz regarding claims process and claimant documentation (.6).	\$	156.00
July-20 Claims Administration & Objections	7/1/2020	KBD	390	0.6 telephone conference with potential counsel for claimants regarding procedural status (.6)	\$	234.00
July-20 Claims Administration & Objections	7/1/2020	KBD	390	0.3 work on claims review with J. Wine (.3)	\$	117.00
July-20 Claims Administration & Objections	7/14/2020	KBD	390	1.5 Prepare for hearing before Judge Lee regarding claims process (1.5)	\$	585.00
July-20 Claims Administration & Objections	7/14/2020	KBD	390	0.5 review alternate proposal for claims process from lender's counsel (.5)	\$	195.00
July-20 Claims Administration & Objections	7/14/2020	KBD	390	1.6 work on claims process with M. Rachlis and J. Wine (1.6)	\$	624.00
July-20 Claims Administration & Objections	7/15/2020	KBD KBD	390 390	2 Prepare for hearing before Judge Lee regarding claims process (2.0)	\$ \$	780.00 507.00
July-20 Claims Administration & Objections July-20 Claims Administration &	7/15/2020 7/15/2020	KBD	390	1.3 participate in hearing before Judge Lee (1.3)0.8 work on claims process issues relating to hearing with M. Rachlis and J. Wine and exchange correspondence	\$	312.00
Objections July-20 Claims Administration &	7/15/2020	KBD	390	with M. Rachlis relating to same (.8) 0.3 review correspondence from claimants and work on responses to same (.3).	\$	117.00
Objections July-20 Claims Administration &	7/16/2020	KBD	390	0.1 attention to documents inventory for communications with institutional lenders (.1).	\$	39.00
Objections July-20 Claims Administration &	7/17/2020	KBD	390	Work on internal EB document collection and production issues (1.0)	\$	390.00
Objections July-20 Claims Administration &	7/17/2020	KBD	390	0.8 confer with M. Rachlis and J. Wine regarding same (.8)	\$	312.00
Objections July-20 Claims Administration &	7/17/2020	KBD	390	0.4 draft correspondence to J. Wine regarding same (.4)	\$	156.00
Objections July-20 Claims Administration &	7/17/2020	KBD	390	0.3 telephone conference with M. Rachlis regarding document issues (.3).	\$	117.00
Objections July-20 Claims Administration & Objections	7/22/2020	KBD	390	0.6 Prepare for call with claimants' counsel relating to document repository and exchange correspondence with M. Rachlis and J. Wine relating to same (.6)		234.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 94 of 157 PageID #:65127

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	OI	ojection
	laims Administration & bjections	7/22/2020	KBD	on 390	0.9 telephone conference with claimants' counsel regarding document repository, EB documents, custodians, various logistics, and costs (.9)	\$	351.00
July-20 C	laims Administration & bjections	7/23/2020	KBD	390	0.3 work on employee list for production of documents and study related information (.3)	\$	117.00
July-20 C	laims Administration & bjections	7/23/2020	KBD	390	0.2 study claim and exchange correspondence with J. Wine relating to same (.2)	\$	78.00
July-20 C	laims Administration & bjections	7/23/2020	KBD	390	0.2 attention to standard interrogatories and requests for production (.2)	\$	78.00
July-20 C	laims Administration & bjections	7/23/2020	KBD	390	0.2 exchange correspondence with claimant regarding hearings and counsel (.2).	\$	78.00
July-20 C	laims Administration & biections	7/24/2020	KBD	390	0.2 exchange correspondence with J. Wine regarding claimants' proof of claim forms (.2)	\$	78.00
	laims Administration & bjections	7/27/2020	KBD	390	0.1 Exchange correspondence regarding potential claimant (.1)	\$	39.00
	laims Administration & bjections	7/27/2020	KBD	390	1.2 work on responses to various claimant communications (1.2)	\$	468.00
•	aims Administration & bjections	7/28/2020	KBD	390	0.3 work on standard discovery requests (.3).	\$	117.00
July-20 C	sset Disposition laims Administration &	7/21/2020 7/6/2020	JR AW	140 140	0.2 update master due diligence spreadsheet regarding same (.2).0.2 attention to claimant's submission and communicate with J. Wine regarding same (.2)	\$ \$	28.00 28.00
July-20 C	bjections laims Administration &	7/6/2020	AW	140	0.4 work in database in multiple claims (.4).	\$	56.00
July-20 C	bjections laims Administration &	7/13/2020	MR	390	1.5 preparation for upcoming hearing (1.5).	\$	585.00
July-20 C	bjections laims Administration & bjections	7/14/2020	JRW	260	0.5 Study briefing on claims process motion in preparation for hearing (.5)	\$	130.00
July-20 C	laims Administration & bjections	7/14/2020	JRW	260	0.3 prepare notes regarding same and related email to M. Rachlis and K. Duff (.3)	\$	78.00
July-20 C	laims Administration & bjections	7/14/2020	JRW	260	0.4 study alternative claims process proposed by institutional lenders (.4)	\$	104.00
July-20 C	laims Administration & bjections	7/14/2020	JRW	260	0.2 telephone conference with K. Duff regarding document vendor (.2)	\$	52.00
•	laims Administration & bjections	7/14/2020	JRW	260	0.4 telephone conference with vendor regarding proposal for document processing and hosting (.4)	\$	104.00
	laims Administration & bjections	7/14/2020	JRW	260	1.6 conference with K. Duff and M. Rachlis regarding mortgagee's alternative procedures and preparation for hearing on claims process motion (1.6).	\$	416.00
•	laims Administration & bjections	7/14/2020	MR	390	1.6 Participate in call regarding alternative procedures filed by lenders with K. Duff and J. Wine (1.6)	\$	624.00
•	laims Administration & bjections	7/14/2020	MR	390	0.5 continued preparation for hearing (.5).	\$	195.00
0	laims Administration & bjections	7/15/2020	AW	140	0.1 communicate with J. Wine regarding claims submission and size of same (.1)	\$	14.00
0	laims Administration & bjections	7/15/2020	JRW	260	2 Work with M. Rachlis and K. Duff to prepare for claims process motion and related discussion with A. Watychowicz regarding EquityBuild documents (2.0)	\$	520.00
0	laims Administration & bjections	7/15/2020	JRW	260	0.1 confer with claims vendor regarding total volume of claims documents (.1)	\$	26.00
0	laims Administration & bjections	7/15/2020	JRW	260	0.3 confer with document repository vendor regarding logistics for file transfer and acknowledgement of confidentiality obligations (.3)	\$	78.00
0	laims Administration & bjections	7/15/2020	JRW	260	0.4 analyze properties and related email to K. Duff and M. Rachlis (.4)	\$	104.00
0	laims Administration & bjections	7/15/2020	JRW	260	0.2 review and comment on notes for oral argument (.2)	\$	52.00
0	laims Administration & bjections	7/15/2020	JRW	260	0.1 compare filed demonstrative exhibit with draft alternative processes from institutional lenders (.1)	\$	26.00
•	laims Administration & bjections	7/15/2020	JRW	260	0.2 review Judge Lee conference instructions (.2)	\$	52.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 95 of 157 PageID #:65128

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
July-20 Claims A		7/15/2020	JRW	on 260	1.4 attend hearing on claims process motion (1.4)	\$	364.00
Objection July-20 Claims A	dministration &	7/15/2020	JRW	260	0.8 conference with K. Duff and M. Rachlis regarding Judge Lee's rulings, composition and volume of EquityBuild	\$	208.00
Objection July-20 Claims A	dministration &	7/15/2020	MR	390	documents, and process for same (.8). 0.5 Further preparation for hearing (.5)	\$	195.00
Objection July-20 Claims A	dministration &	7/15/2020	MR	390	2 and conferences with K. Duff and J. Wine regarding same (2.0)	\$	780.00
Objection July-20 Claims A Objection	dministration &	7/15/2020	MR	390	1.4 attend hearing (1.4)	\$	546.00
July-20 Claims A Objection	dministration &	7/15/2020	MR	390	0.8 conferences with K. Duff and J. Wine regarding various issues resulting from hearing (.8).	\$	312.00
July-20 Claims A Objection	dministration &	7/16/2020	AW	140	0.5 Conference call with J. Wine regarding claims motion hearing and preparation to meet deadline regarding EquityBuild, Inc's documents (.5)	\$	70.00
July-20 Claims A Objection	dministration &	7/16/2020	AW	140	0.2 email exchange with the Receivership team regarding inventory and current status of documents (.2)	\$	28.00
July-20 Claims A Objection	dministration &	7/16/2020	AW	140	2.1 start work on detailed inventory of documents in online portal (2.1).	\$	294.00
July-20 Claims A Objection	dministration &	7/16/2020	JRW	260	0.4 Confer with A. Watychowicz regarding inventory of documents and efforts to collect same (.4)	\$	104.00
July-20 Claims A Objection	dministration &	7/17/2020	AW	140	0.8 Complete work on detailed inventory of documents in e-sign online portal, review data collected by IT consultant, and email counsel regarding same.	\$	112.00
July-20 Claims A Objection	dministration &	7/17/2020	JRW	260	1.2 Conference call with K. Duff and M. Rachlis regarding plan for producing EquityBuild documents to claimants (1.2)	\$	312.00
July-20 Claims A Objection	dministration &	7/17/2020	JRW	260	7.4 7	\$	104.00
July-20 Claims A Objection	dministration &	7/17/2020	MR	390	1.2 Attention to various issues on claims process matters associated with documents and conferences regarding same with A. Watychowicz, J. Wine and K. Duff.	\$	468.00
July-20 Claims A Objection	dministration &	7/20/2020	AW	140	0.7 conference with IT consultant regarding EquityBuild, Inc.'s documents and finalize inventory (.7)	\$	98.00
July-20 Claims A Objection	dministration &	7/20/2020	AW	140	0.8 communicate with J. Wine regarding available bank statements and start supplementing available records (.8).	\$	112.00
July-20 Claims A Objection	dministration &	7/20/2020	JRW	260	0.2 Exchange correspondence with eDiscovery vendor regarding proposal (.2)	\$	52.00
July-20 Claims A Objection	dministration &	7/20/2020	JRW	260	1.7 further investigation of EquityBuild documents and related review of notes from forensic IT consultant (1.7).	\$	442.00
July-20 Claims A Objection	dministration &	7/22/2020	JRW	260	1.5 research and update document inventory and confer with M. Rachlis in preparation for same (1.5)	\$	390.00
July-20 Claims A Objection	dministration &	7/22/2020	JRW	260	0.8 conference with K. Duff and M. Rachlis regarding document collection, information regarding EquityBuild employees, priority status of secured lender claims and motion practice (.8)	\$	208.00
July-20 Claims A Objection	dministration &	7/22/2020	JRW	260	0.1 follow up with A. Watychowicz and K. Pritchard regarding categories of documents (.1)	\$	26.00
July-20 Claims A Objection	dministration &	7/22/2020	JRW	260	0.2 attention to responses to claimant inquiries (.2)	\$	52.00
July-20 Claims A Objection	dministration &	7/22/2020	JRW	260	0.8 conference call with claimant counsel, K. Duff and M. Rachlis regarding EB documents (.8)	\$	208.00
July-20 Claims A Objection	dministration &	7/22/2020	JRW	260	0.1 review memorandum from counsel for institutional lender regarding preliminary list of requested documents (.1).	\$	26.00
July-20 Claims A Objection	dministration &	7/22/2020	MR	390	1.2 Prepare for (1.2)	\$	468.00
July-20 Claims A Objection	dministration &	7/22/2020	MR	390	0.8 and participate in call with claimant's counsel regarding EB documents and data base issues (.8)	\$	312.00
July-20 Claims A Objection	dministration &	7/22/2020	MR	390	0.8 discussions regarding same with K. Duff and J. Wine (.8)	\$	312.00
July-20 Claims A Objection	dministration &	7/22/2020	MR	390	0.3 attention to claims files regarding lender issues (.3)	\$	117.00
July-20 Claims A Objection	dministration &	7/24/2020	JRW	260	0.8 related review of claim forms, amendments submitted through portal and supporting materials (.8)	\$	208.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 96 of 157 PageID #:65129

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
•	aims Administration &	7/24/2020	JRW	on 260	0.3 email exchange with claims vendor regarding amended claims (.3).	\$	78.00
July-20 Cla	jections ims Administration &	7/27/2020	AW	140	0.2 Review claim submission, revision to master claim sheet, and respond to email from claimant regarding same	\$	28.00
July-20 Cla	jections ims Administration &	7/27/2020	AW	140	(.2)0.4 attention to emails from claimant and communicate with counsel regarding same (.4).	\$	56.00
July-20 Cla	jections ims Administration &	7/27/2020	JRW	260	0.2 Exchange correspondence with claims vendor regarding procedure for amending claims (.2)	\$	52.00
July-20 Cla	jections ims Administration &	7/27/2020	JRW	260	0.3 telephone conference with A. Watychowicz regarding amendments to claims in portal (.3)	\$	78.00
July-20 Cla	jections ims Administration &	7/27/2020	JRW	260	0.2 related communications with K. Duff regarding response to claimant's counsel (.2)	\$	52.00
July-20 Cla	jections ims Administration &	7/28/2020	AW	140	0.1 communicate with J. Wine regarding inception of template for master claims spreadsheet (.1)	\$	14.00
July-20 Cla	jections ims Administration &	7/28/2020	AW	140	0.1 finalize notice of receivership to vendor (.1)	\$	14.00
July-20 Cla	jections ims Administration &	7/29/2020	AW	140	0.3 Continue work on inventory of EquityBuild documents and communicate with J. Wine regarding same (.3)	\$	42.00
July-20 Cla	jections nims Administration &	7/29/2020	AW	140	0.1 communicate with IT consultant regarding online storage inventory (.1)	\$	14.00
July-20 Cla	jections ims Administration &	7/29/2020	JRW	260	0.5 Telephone conference with potential e-discovery vendor (.5)	\$	130.00
July-20 Cla	jections nims Administration &	7/29/2020	JRW	260	1.5 prepare spreadsheet of EquityBuild documents for lender's counsel (1.5)	\$	390.00
July-20 Cla	jections ims Administration &	7/29/2020	JRW	260	0.2 telephone conference with A. Watychowicz regarding bank records (.2)	\$	52.00
July-20 Cla	jections ims Administration &	7/29/2020	JRW	260	0.4 telephone conference with K. Duff and M. Rachlis regarding inventory of EquityBuild documents (.4)	\$	104.00
July-20 Cla	jections ims Administration &	7/29/2020	JRW	260	0.7 telephone conference with claimant's counsel regarding EquityBuild documents and database (.7)	\$	182.00
July-20 Cla	jections nims Administration &	7/29/2020	JRW	260	0.8 review documents from EquityBuild counsel (.8)	\$	208.00
July-20 Cla	jections iims Administration &	7/29/2020	JRW	260	0.3 emails to counsel for claimant regarding EquityBuild documents and potential e-discovery vendor (.3).	\$	78.00
July-20 Cla	jections iims Administration &	7/29/2020	MR	390	0.3 Conferences regarding production issues with K. Duff (.3)	\$	117.00
July-20 Cla	jections nims Administration &	7/29/2020	MR	390	0.4 J. Wine (.4)	\$	156.00
July-20 Cla	jections iims Administration &	7/29/2020	MR	390	0.4 review materials regarding same (.4)	\$	156.00
July-20 Cla	jections iims Administration &	7/30/2020	JRW	260	0.1 email exchange with claimant's counsel and potential vendor regarding meeting (.1).	\$	26.00
August-20 Cla	jections nims Administration &	8/3/2020	KBD	390	0.5 Work on protective order and legal research regarding same (.5)	\$	195.00
August-20 Cla	jections ims Administration &	8/3/2020	KBD	390	0.9 attention to communications with claimants regarding claims, claims process, and timing (.9)	\$	351.00
August-20 Cla	jections ims Administration &	8/4/2020	KBD	390	0.3 Exchange correspondence with J. Wine and M. Rachlis regarding document discovery issues and	\$	117.00
August-20 Cla	jections ims Administration &	8/4/2020	KBD	390	communications with claimants' counsel (.3) 0.3 work on protective order and standard written discovery requests for all claimants and exchange	\$	117.00
August-20 Cla	jections ims Administration &	8/4/2020	KBD	390	correspondence with J. Wine and M. Rachlis regarding same (.3) 0.1 study correspondence from and draft correspondence to claimant regarding claims submission and reporting	\$	39.00
August-20 Cla	jections ims Administration &	8/5/2020	KBD	390	of same (.1). 1 work on response to claimants' inquiries regarding claims process and timing (1.0).	\$	390.00
August-20 Cla	jections ims Administration &	8/9/2020	KBD	390	0.2 Attention to claim and supporting documents and exchange correspondence with A. Watychowicz regarding	\$	78.00
August-20 Cla	jections nims Administration & jections	8/10/2020	KBD	390	same. 0.7 Study standard written discovery requests and exchange correspondence regarding same.	\$	273.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 97 of 157 PageID #:65130

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
August-20 Claims Administration &	8/11/2020	KBD	on 390	2 Prepare for hearing before Judge Lee (2.0)	\$	780.00
Objections August-20 Claims Administration & Objections	8/11/2020	KBD	390	0.1 review correspondence from M. Rachlis regarding preparation for hearing (.1)	\$	39.00
August-20 Claims Administration & Objections	8/11/2020	KBD	390	0.4 legal research regarding claims (.4).	\$	156.00
August-20 Claims Administration & Objections	8/12/2020	KBD	390	1.1 Confer with M. Rachlis and J. Wine regarding standard discovery, claimants' intervention motion, corporation status issues, and preparation for hearing before Judge Lee (1.1)	\$	429.00
August-20 Claims Administration & Objections	8/13/2020	KBD	390	1.5 Prepare for hearing before Judge Lee on claims process (1.5)	\$	585.00
August-20 Claims Administration & Objections	8/13/2020	KBD	390	0.3 telephone conference with J. Wine and M. Rachlis regarding standard discovery requests, draft protective order, and intervention motion (.3)	\$	117.00
August-20 Claims Administration & Objections	8/13/2020	KBD	390	1.2 appear for hearing before Judge Lee (1.2)	\$	468.00
August-20 Claims Administration & Objections	8/13/2020	KBD	390	1.2 confer with M. Rachlis and J. Wine regarding various issues raised during hearing (1.2)	\$	468.00
August-20 Claims Administration & Objections	8/13/2020	KBD	390	0.1 exchange correspondence relating to communication with claimant's counsel regarding claims process (.1)	\$	39.00
August-20 Claims Administration & Objections	8/16/2020	KBD	390	0.3 Review draft standard discovery requests.	\$	117.00
August-20 Claims Administration & Objections	8/25/2020	KBD	390	0.2 study claims by property information and correspondence from J. Wine relating to same (.2) 0.1 Communicate with claims vendor regarding revisions to database (.1)	\$ \$	78.00
August-20 Claims Administration & Objections August-20 Claims Administration &	8/3/2020 8/3/2020	AW AW	140 140	0.1 Communicate with claims vendor regarding revisions to database (.1) 0.7 work with K. Duff and J. Wine on responses to claimants' emails (.7)	\$ \$	14.00 98.00
Objections August-20 Claims Administration &	8/3/2020	AW	140	0.1 reach out to claims vendor regarding claim (.1)	\$	14.00
Objections August-20 Claims Administration &	8/3/2020	AW	140	0.1 communicate with J. Wine regarding volume of gathered bank statements (.1).	\$	14.00
Objections August-20 Claims Administration &	8/3/2020	JRW	260	0.1 Research regarding claimant (.1)	\$	26.00
Objections August-20 Claims Administration &	8/3/2020	JRW	260	1 review and confer with A. Watychowicz regarding draft responses to claimant inquiries (1.0)	\$	260.00
Objections August-20 Claims Administration &	8/3/2020	JRW	260	0.1 correspondence to claimant's counsel regarding volume of data (.1)	\$	26.00
Objections August-20 Claims Administration &	8/3/2020	JRW	260	0.6 review and revise draft protective order and related communications with M. Rachlis and K. Duff (.6)	\$	156.00
Objections August-20 Claims Administration &	8/3/2020	JRW	260	1.3 prepare for and attend conference with potential discovery vendor and claimant's counsel regarding database	\$	338.00
Objections August-20 Claims Administration &	8/3/2020	JRW	260	proposal (1.3) 0.2 and related follow-up communication (.2).	\$	52.00
Objections August-20 Claims Administration & Objections	8/3/2020	MR	390	0.3 Attention to protective order issues (.3)	\$	117.00
August-20 Claims Administration & Objections	8/3/2020	MR	390	0.3 follow up and review materials regarding claimants' motion to intervene (.3)	\$	117.00
August-20 Claims Administration & Objections	8/4/2020	AW	140	0.1 Attention to email from claimant and discuss same with K. Duff (.1)	\$	14.00
August-20 Claims Administration & Objections	8/4/2020	AW	140	0.6 work on claimant's communications regarding claim and multiple communications with claims vendor regarding same (.6)	\$	84.00
August-20 Claims Administration & Objections	8/4/2020	AW	140	0.1 communicate with K. Duff and J. Wine regarding claimant's communication (.1)	\$	14.00
August-20 Claims Administration & Objections	8/4/2020	AW	140	0.2 email claimant regarding potential claim and response to follow-up email (.2)	\$	28.00
August-20 Claims Administration & Objections	8/4/2020	AW	140	0.2 research and follow up with J. Wine regarding proposed protective order (.2)	\$	28.00
August-20 Claims Administration & Objections	8/4/2020	AW	140	0.2 communicate with IT consultant regarding former EquityBuild employees' email accounts and follow up with J. Wine regarding same (.2).	\$	28.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 98 of 157 PageID #:65131

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
August-20 Claims Administration & Objections	8/4/2020	JRW	on 260	0.7 Legal research regarding protective order issue and related analysis to K. Duff and M. Rachlis (.7)	\$	182.00
August-20 Claims Administration & Objections	8/4/2020	JRW	260	0.2 further revision of protective order (.2)	\$	52.00
August-20 Claims Administration & Objections	8/4/2020	JRW	260	0.7 review standard interrogatories and document requests, and prepare email analysis of same (.7)	\$	182.00
August-20 Claims Administration & Objections	8/4/2020	JRW	260	0.1 exchange correspondence with M. Rachlis and K. Duff regarding standard interrogatories and requests for production (.1)	\$	26.00
August-20 Claims Administration & Objections	8/4/2020	JRW	260	0.1 correspondence with claims vendor regarding deleted clams (.1)	\$	26.00
August-20 Claims Administration & Objections	8/4/2020	JRW	260	1.2 legal research regarding claims analysis issue (1.2).	\$	312.00
August-20 Claims Administration & Objections	8/4/2020	MR	390	0.4 Attention to issues on standard discovery and issues on EB document library.	\$	156.00
August-20 Claims Administration & Objections	8/5/2020	AW	140	0.7 Communicate with K. Duff regarding responses to claimants and finalize responses (.7)	\$	98.00
August-20 Claims Administration & Objections	8/5/2020	AW	140	0.3 work with claims vendor regarding claim and other issues (.3)	\$	42.00
August-20 Claims Administration & Objections	8/5/2020	JRW	260	0.2 Exchange correspondence with K. Duff and M. Rachlis regarding revised protective order and forward same to counsel for institutional (.2)		52.00
August-20 Claims Administration & Objections August-20 Claims Administration &	8/5/2020 8/5/2020	JRW JRW	260 260	0.1 correspondence with claims vendor regarding claim (.1) 1 study multiple claim submissions (1.0)	\$ \$	26.00 260.00
Objections August-20 Claims Administration & August-20 Claims Administration &	8/5/2020	JRW	260	1.4 review records for various funds and update property spreadsheet (1.4).	\$	364.00
Objections August-20 Claims Administration &	8/5/2020	MR	390	0.3 Review communications to claimants and attention to protective order.	\$	117.00
Objections August-20 Claims Administration &	8/6/2020	AW	140	0.8 Work on issue regarding records submitted by claimant and resolution with claims vendor and J. Wine (.8)	\$	112.00
Objections August-20 Claims Administration &	8/6/2020	JRW	260	0.3 Email exchanges with K. Duff, A. Watychowicz and claims vendor regarding claim and available claim	\$	78.00
Objections August-20 Claims Administration &	8/6/2020	JRW	260	numbers (.3) 0.3 telephone conference with A. Watychowicz regarding same (.3)	\$	78.00
Objections August-20 Claims Administration &	8/6/2020	JRW	260	1.6 confer with K. Duff regarding analysis of claims (1.6).	\$	416.00
Objections August-20 Claims Administration &	8/7/2020	AW	140	0.2 review draft standard discovery requests to claimants and email exchanges with J. Wine regarding same (.2).	\$	28.00
Objections August-20 Claims Administration &	8/7/2020	JRW	260	1.5 Conference call with counsel for claimants and potential documents database vendor regarding database	\$	390.00
Objections August-20 Claims Administration & Objections	8/7/2020	JRW	260	proposal (1.5) 1.5 continued analysis of claims by property (1.5).	\$	390.00
August-20 Claims Administration & Objections	8/7/2020	MR	390	0.9 Conferences on issues regarding claims related issues (.9)	\$	351.00
August-20 Claims Administration & Objections	8/10/2020	AW	140	0.1 Confirm receipt of claim (.1)	\$	14.00
August-20 Claims Administration & Objections	8/10/2020	AW	140	0.4 review claims, update master claims list and request update to claims database and removal of duplicate (.4)	\$	56.00
August-20 Claims Administration & Objections	8/10/2020	AW	140	0.2 review and communicate with J. Wine regarding potential responses and interrogatories to claimants (.2).	\$	28.00
August-20 Claims Administration & Objections	8/10/2020	JRW	260	0.7 Attention to draft standard interrogatories and document requests and related exchange of comments with M. Rachlis and K. Duff (.7)	\$	182.00
August-20 Claims Administration & Objections	8/10/2020	JRW	260	1.4 continued analysis of claims by property and fund balances by property (1.4).	\$	364.00
August-20 Claims Administration & Objections	8/10/2020	MR	390	1.5 Work on discovery related issues and court order.	\$	585.00
August-20 Claims Administration & Objections	8/11/2020	AW	140	0.4 review and communicate with J. Wine regarding claim and amounts claimed (.4).	\$	56.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 99 of 157 PageID #:65132

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
August-20 Claims Administration & Objections	8/11/2020	JRW	on 260	0.3 Review proofs of claim and work with A. Watychowicz regarding duplicative claims (.3)	\$	78.00
August-20 Claims Administration & Objections	8/11/2020	JRW	260	0.4 telephone conference with SEC (.4)	\$	104.00
August-20 Claims Administration & Objections	8/11/2020	JRW	260	1.7 draft revised set of standard interrogatories to investors (1.7).	\$	442.00
August-20 Claims Administration & Objections	8/11/2020	MR	390	1 Preparation for upcoming hearing before Judge Lee on claims process.	\$	390.00
August-20 Claims Administration & Objections	8/12/2020	AW	140	0.1 Respond to claimant's update request (.1)	\$	14.00
August-20 Claims Administration & Objections	8/12/2020	AW	140	0.3 review and communicate with K. Duff and J. Wine regarding claimant's counsel update request (.3)	\$	42.00
August-20 Claims Administration & Objections	8/12/2020	AW	140	0.8 phone call with J. Wine regarding potential discovery requests to claimants and follow up email to J. Wine, K. Duff and M. Rachlis regarding same (.8).	\$	112.00
August-20 Claims Administration & Objections	8/12/2020	JRW	260	1.8 Draft proposed standard interrogatories and document requests to investors (1.8)	\$	468.00
August-20 Claims Administration & Objections	8/12/2020	JRW	260	0.2 related analysis and exchange of drafts with M. Rachlis and K. Duff (.2)	\$	52.00
August-20 Claims Administration & Objections	8/12/2020	JRW	260	0.6 draft correspondence to claimant's counsel regarding standard discovery requests and related communications with and revisions from M. Rachlis (.6)	\$	156.00
August-20 Claims Administration & Objections August-20 Claims Administration &	8/12/2020 8/12/2020	JRW JRW	260 260	1.1 telephone conference with M. Rachlis and K. Duff regarding motion to intervene, standard discovery responses, and preparation for continued hearing on claims process motion (1.1)1.3 prepare standard discovery requests to institutional lenders (1.3)	\$ \$	286.00 338.00
Objections August-20 Claims Administration & August-20 Claims Administration &	8/12/2020	JRW	260	0.3 correspondence with SEC (.3)	\$	78.00
Objections August-20 Claims Administration &	8/12/2020	JRW	260	0.2 review and revise correspondence to counsel for lenders regarding motion to intervene (.2).	\$	52.00
Objections August-20 Claims Administration &	8/12/2020	MR	390	1.2 Review and revise of draft discovery and comment on same and letter regarding same (1.2)	\$	468.00
Objections August-20 Claims Administration &	8/12/2020	MR	390	1.1 conferences with J. Wine and K. Duff regarding discovery and upcoming hearing (1.1)	\$	429.00
Objections August-20 Claims Administration &	8/12/2020	MR	390	2.4 further preparation for hearing (2.4).	\$	936.00
Objections August-20 Claims Administration &	8/13/2020	AW	140	0.2 Communicate with K. Duff regarding voicemail from claimant regarding investment (.2)	\$	28.00
Objections August-20 Claims Administration &	8/13/2020	AW	140	0.3 communicate with J. Wine regarding claimant's request made to court (.3)	\$	42.00
Objections August-20 Claims Administration & Objections	8/13/2020	AW	140	0.1 draft response to email inquiry (.1).	\$	14.00
August-20 Claims Administration & Objections	8/13/2020	JRW	260	0.3 Review proposed revisions to protective order and related email to counsel, K. Duff and M. Rachlis (.3)	\$	78.00
August-20 Claims Administration & Objections	8/13/2020	JRW	260	0.2 review court's directives for telephonic hearing (.2)	\$	52.00
August-20 Claims Administration & Objections	8/13/2020	JRW	260	0.3 telephone conference with M. Rachlis and SEC (.3)	\$	78.00
August-20 Claims Administration & Objections	8/13/2020	JRW	260	0.2 telephone conference with K. Duff and M. Rachlis regarding standard discovery and preparation for hearing (.2)	\$	52.00
August-20 Claims Administration & Objections	8/13/2020	JRW	260	1.2 review and revise draft discovery requests (1.2)	\$	312.00
August-20 Claims Administration & Objections	8/13/2020	JRW	260	0.9 prepare presentation for court regarding EquityBuild documents and related preparation for hearing (.9)	\$	234.00
August-20 Claims Administration & Objections	8/13/2020	JRW	260	1.2 attend telephonic hearing before Judge Lee on intervention motion, claims process motion, EquityBuild documents and standard discovery (1.2)	\$	312.00
August-20 Claims Administration & Objections	8/13/2020	JRW	260	0.6 related telephone conference with M. Rachlis and K. Duff regarding judge's rulings and request for statistics regarding claims (.6).	\$	156.00
August-20 Claims Administration & Objections	8/13/2020	MR	390	2.3 Further preparation for hearing before Judge Lee (2.3)	\$	897.00

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
•	Claims Administration &	8/13/2020	MR	on 390	0.6 conference with J. Wine and K. Duff regarding same (.6)	\$	234.00
August-20 C	Objections Claims Administration & Objections	8/13/2020	MR	390	1.2 participate in hearing (1.2)	\$	468.00
August-20 C	Claims Administration & Objections	8/13/2020	MR	390	0.2 conferences on discovery issues raised by court with K. Duff and J. Wine (.2)	\$	78.00
August-20 C	Claims Administration & Objections	8/13/2020	MR	390	0.5 follow up and review response to intervention motion (.5)	\$	195.00
August-20 C	Claims Administration & Objections	8/13/2020	MR	390	0.3 further conferences with J. Wine and K. Duff (.3).	\$	117.00
August-20 C	Claims Administration & Objections	8/17/2020	AW	140	0.2 Respond to claimant's voice message and request for information.	\$	28.00
August-20 C	Claims Administration & Objections	8/17/2020	JRW	260	0.9 continued analysis of claims (.9).	\$	234.00
August-20 C	Claims Administration & Objections	8/18/2020	JRW	260	0.3 related analysis (.3)	\$	78.00
August-20 C	Claims Administration & Objections	8/18/2020	JRW	260	0.5 and follow-up call with M. Rachlis and K. Duff (.5)	\$	130.00
August-20 C	Claims Administration & Objections	8/18/2020	JRW	260	0.3 review proposed responses to claimant inquiries and related communication with A. Watychowicz (.3).	\$	78.00
August-20 C	Claims Administration & Objections	8/20/2020	JRW	260	0.4 Review proof of claim and supporting documents and related communications with A. Watychowicz regarding necessary revisions to master claims spreadsheet.	\$	104.00
August-20 C	Claims Administration & Objections	8/23/2020	JRW	260	0.4 Review claims submitted by claimant.	\$	104.00
August-20 C	Claims Administration & Objections	8/25/2020	AW	140	0.2 request update to claims database as per claimant's email and cover letter and follow up with vendor regarding same (.2).	\$	28.00
August-20 C	Claims Administration & Objections	8/27/2020	AW	140	0.3 Revisions to master claims list as per claimant's summary and follow up communication with claims vendor (.3)	\$	42.00
August-20 C	Claims Administration & Objections	8/27/2020	AW	140	0.9 work with K. Duff on responses to claimants' emails and email responses (.9).	\$	126.00
August-20 C	Claims Administration & Objections	8/27/2020	JRW	260	0.1 related review of information and confer with A. Watychowicz regarding claimant (.1)	\$	26.00
August-20 C	Claims Administration & Objections	8/27/2020	JRW	260	0.8 related review of claim forms (.8)	\$	208.00
August-20 C	Claims Administration & Objections	8/28/2020	JRW	260	0.1 confer with A. Watychowicz regarding updates to master claims spreadsheet (.1)	\$	26.00
August-20 C	Claims Administration & Objections	8/28/2020	JRW	260	0.1 exchange correspondence with claimant's counsel regarding motion to file oversized brief (.1)	\$	26.00
August-20 C	Claims Administration & Objections	8/28/2020	JRW	260	0.1 confer with K. Duff regarding further analysis regarding [timing of investments] (.1)	\$	26.00
August-20 C	Claims Administration & Objections	8/31/2020	AW	140	0.9 Communicate with J. Wine regarding documents received from claimants and research regarding same (.9)	\$	126.00
August-20 C	Claims Administration & Objections	8/31/2020	AW	140	0.6 communicate with claims vendor regarding update to database and prepare documents for same (.6)	\$	84.00
August-20 C	Claims Administration & Objections	8/31/2020	AW	140	0.2 email exchange with K. Duff regarding hearing related to claims (.2)	\$	28.00
August-20 C	Claims Administration & Objections	8/31/2020	AW	140	0.8 work on charts requested by Judge Lee (.8)	\$	112.00
August-20 C	Claims Administration & Objections	8/31/2020	JRW	260	0.3 and review same (.3)	\$	78.00
August-20 C	Claims Administration & Objections	8/31/2020	JRW	260	0.2 correspondence to K. Duff and M. Rachlis regarding rollover paperwork (.2)	\$	52.00
August-20 C	Claims Administration & Objections	8/31/2020	JRW	260	0.1 exchange correspondence with potential e-discovery vendor (.1).	\$	26.00
September-20 C	Claims Administration & Objections	9/1/2020	KBD	390	0.1 review statistical graphs of claims data for Judge Lee (.1)	\$	39.00
September-20 C	Claims Administration & Objections	9/1/2020	KBD	390	0.1 review claim information and communication with claimant's counsel (.1).	\$	39.00

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
September 20 C	laims Administration &	9/3/2020	KBD	on 390	0.3 Exchange correspondence with A. Watychowicz regarding rollovers and related documentation.	\$	117.00
. 0	bjections						
	laims Administration & bjections	9/4/2020	KBD	390	0.5 Work on claims process and evaluate change in institutional lenders' position on priority determination (.5)	\$	195.00
	laims Administration &	9/4/2020	KBD	390	0.5 draft and revise correspondence to claimants' counsel regarding request for claims information and EB documents (.5)	\$	195.00
September-20 C	laims Administration &	9/10/2020	KBD	390	0.2 study correspondence regarding standard discovery requests (.2)	\$	78.00
September-20 C	laims Administration &	9/16/2020	KBD	390	0.5 Attention to claimant communications and exchange correspondence with J. Wine regarding same (.5)	\$	195.00
September-20 C	laims Administration &	9/16/2020	KBD	390	0.4 study correspondence regarding standard discovery and exchange correspondence with M. Rachlis and J. Wine regarding same (.4)	\$	156.00
September-20 C	laims Administration &	9/16/2020	KBD	390	0.2 study draft data charts for the court (.2).	\$	78.00
September-20 C	laims Administration &	9/17/2020	KBD	390	0.1 Confer with J. Wine regarding claims analysis against properties and funds (.1)	\$	39.00
September-20 C	laims Administration &	9/17/2020	KBD	390	0.2 and claims discovery, analysis criteria, and planning (.2)	\$	78.00
September-20 C	laims Administration &	9/17/2020	KBD	390	0.2 study and exchange correspondence regarding claims data charts (.2).	\$	78.00
September-20 C	laims Administration &	9/18/2020	KBD	390	0.2 Attention to standard discovery requests (.2)	\$	78.00
September-20 C	laims Administration &	9/21/2020	KBD	390	0.4 confer with J. Wine regarding claims charts and document vendor (.4)	\$	156.00
September-20 C	laims Administration &	9/21/2020	KBD	390	0.2 exchange correspondence with J. Wine and M. Rachlis regarding discovery and filing for court (.2)	\$	78.00
September-20 C	laims Administration &	9/21/2020	KBD	390	0.3 work on claims process structure (.3).	\$	117.00
September-20 C	laims Administration &	9/22/2020	KBD	390	2.5 Work on standard discovery requests, confidentiality order, claims amount charts, and status report and confer with M. Rachlis and J. Wine regarding same (2.5)	\$	975.00
September-20 C	laims Administration &	9/22/2020	KBD	390	0.2 attention to correspondence with claimants (.2).	\$	78.00
September-20 C	laims Administration &	9/23/2020	KBD	390	1.8 Prepare for hearing before Judge Lee on claims (1.8)	\$	702.00
September-20 C	laims Administration &	9/23/2020	KBD	390	1.3 appear for hearing before Judge Lee (1.3)	\$	507.00
September-20 C	laims Administration &	9/23/2020	KBD	390	0.3 attention to standard discovery requests (.3)	\$	117.00
September-20 C	laims Administration &	9/23/2020	KBD	390	0.6 work on responses to and communications with claimants (.6)	\$	234.00
September-20 C	claims Administration &	9/23/2020	KBD	390	0.2 draft correspondence to investor claimants relating to claimant request (.2).	\$	78.00
September-20 C	laims Administration &	9/28/2020	KBD	390	0.2 study draft status report on unresolved matters (.2).	\$	78.00
September-20 C	laims Administration &	9/29/2020	KBD	390	0.4 work on status report on unresolved motions (.4)	\$	156.00
September-20 C	laims Administration &	9/29/2020	KBD	390	0.3 review standard written discovery (.3).	\$	117.00
September-20 C	laims Administration &	9/30/2020	KBD	390	0.4 study revised draft standard discovery requests and correspondence regarding same (.4)	\$	156.00
September-20 C	laims Administration &	9/30/2020	KBD	390	0.4 study revisions to and revise draft status report on open issues for court resolution and correspondence regarding same (.4).	\$	156.00
September-20 B	usiness Operations	9/1/2020	AW	140	0.2 Communicate with K. Pritchard regarding available bank records.	\$	28.00
September-20 B	usiness Operations	9/1/2020	KMP	140	2.1 Review Receivership Estate account records and update spreadsheet regarding types of available records and confer with K. Duff and A. Watychowicz regarding same.	\$	294.00
September-20 B	usiness Operations	9/2/2020	KMP	140	1.8 Review Receivership Estate account records and update spreadsheet regarding types of available records, and confer with K. Duff regarding same.	\$	252.00
September-20 B	usiness Operations	9/8/2020	AW	140	0.1 Follow up with counsel regarding online platform (.1)	\$	14.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 102 of 157 PageID #:65135

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
	aims Administration &	9/11/2020 9/1/2020	JRW AW	on 260 140	0.1 Telephone conference with A. Watychowicz regarding communication from database vendor (.1)3.2 continue and complete work on claims charts requested by Judge Lee (3.2).	\$	26.00 448.00
September-20 Cla	jections aims Administration & jections	9/1/2020	JRW	260	0.3 work with A. Watychowicz regarding depiction of claimants by amount claimed (.3)	\$	78.00
September-20 Cla	jections aims Administration & jections	9/2/2020	AW	140	3.3 review and updates to master claims sheet and database (3.3)	\$	462.00
September-20 Cla	aims Administration & jections	9/2/2020	JRW	260	0.1 confer with A. Watychowicz regarding updates to master claims spreadsheet (.1)	\$	26.00
September-20 Cla	aims Administration & jections	9/2/2020	JRW	260	0.1 telephone conferences with K. Duff (.1)	\$	26.00
September-20 Cla	aims Administration & jections	9/3/2020	AW	140	0.4 Research regarding claimants' rollovers and report to K. Duff and J. Wine regarding same (.4)	\$	56.00
September-20 Cla	aims Administration & jections	9/3/2020	AW	140	0.1 communicate with vendor regarding update to claims database (.1).	\$	14.00
	ims Administration & jections	9/3/2020	JRW	260	0.6 Conference call with potential document vendor and counsel for institutional lenders (.6)	\$	156.00
	ims Administration & jections	9/3/2020	JRW	260	0.1 and related review of revised proposal (.1)	\$	26.00
	aims Administration & jections	9/3/2020	JRW	260	0.1 email exchange with potential document vendor regarding status (.1)	\$	26.00
Ob	aims Administration & jections	9/3/2020	JRW	260	0.1 exchange correspondence with counsel for claimant (.1)	\$	26.00
Ob	aims Administration & jections	9/4/2020	AW	140	0.1 call and message for claimant's representative and follow up with same (.1)	\$	14.00
Ob	aims Administration & jections	9/7/2020	MR	390	1.8 Attention to issues on objections and follow up on standard discovery related items.	\$	702.00
Ob	aims Administration & jections	9/8/2020	AW	140	0.1 attention to email from regarding information provided and communicate with counsel regarding same (.1).	\$	14.00
Ob	aims Administration & jections	9/8/2020	JRW	260	0.3 review fund documentation (.3)	\$	78.00
Ob	aims Administration & jections	9/8/2020	JRW	260	0.5 review revisions to draft confidentiality order from claimant's counsel and related internal correspondence (.5)	\$	130.00
Ob	aims Administration & jections	9/8/2020	JRW	260	0.8 review proposed revisions from claimant's counsel to standard discovery requests to investors, further revise same, and related internal correspondence (.8)	\$	208.00
Ob	aims Administration & jections	9/8/2020	JRW	260	0.4 review proposed revisions from counsel to standard discovery requests to institutional lenders, further revise same, and related internal correspondence (.4)	\$	104.00
Ob	aims Administration & jections	9/8/2020	JRW	260	0.8 research regarding claims submitted by claimants and related analysis to K. Duff and A. Watychowicz (.8).	\$	208.00
Ob	aims Administration & jections	9/9/2020	AW	140	0.1 Review and respond to claimant email (.1)	\$	14.00
Ob	aims Administration & jections	9/9/2020	AW	140	0.1 update claimant's information as per request of his former counsel (.1)	\$	14.00
Ob	aims Administration & jections	9/9/2020	AW	140	0.1 follow up regarding response to claimant (.1)	\$	14.00
Ob	aims Administration & jections	9/9/2020	JRW	260	0.1 confer with M. Rachlis regarding standard discovery (.1)	\$	26.00
Ob	aims Administration & jections	9/9/2020	JRW	260	1.1 additional revisions to standard discovery requests and related correspondence to institutional lenders' counsel (1.1)	\$	286.00
Ob	aims Administration & jections	9/9/2020	MR	390	0.1 attention to standard discovery issues with J. Wine (.1)	\$	39.00
Ob	aims Administration & jections	9/10/2020	AW	140	0.2 Communicate with counsel about and respond to email from claimant (.2)	\$	28.00
Ob	aims Administration & jections	9/10/2020	AW	140	0.1 follow up regarding response to claimant (.1).	\$	14.00
•	aims Administration & jections	9/10/2020	JRW	260	0.7 conference with claimants' counsel and potential e-discovery vendor regarding proposal (.7).	\$	182.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 103 of 157 PageID #:65136

Entry Date Tir Kee		ime Keeper Rate	Task Hours		Task Assessment Category Cost	Ob	jection
September-20 Claims Administr	<u></u>	9/11/2020	AW	on 140	0.2 Attention to voicemail from counsel for claimant and follow up with J. Wine and K. Duff regarding	\$	28.00
Objections September-20 Claims Administr		9/11/2020	JRW	260	communications from same (.2) 0.1 review correspondence from counsel for claimant (.1)	\$	26.00
Objections						\$	
September-20 Claims Administr Objections		9/11/2020	JRW	260	0.1 telephone conference with claimant regarding standard discovery (.1)	·	26.00
September-20 Claims Administr Objections	ation &	9/14/2020	AW	140	0.2 Attention to draft notice of receivership to counsel, proofread, and email J. Wine regarding revisions.	\$	28.00
September-20 Claims Administr Objections	ation &	9/14/2020	JRW	260	1.4 draft correspondence to collections counsel regarding judgments (1.4).	\$	364.00
September-20 Claims Administr Objections	ation &	9/15/2020	AW	140	0.5 Respond via email to voicemails and request emails from claimants (.5)	\$	70.00
September-20 Claims Administr Objections	ation &	9/15/2020	JRW	260	0.2 Telephone conference with M. Rachlis regarding email exchanges with claimant's counsel and courtroom deputy (.2)	\$	52.00
September-20 Claims Administr Objections	ation &	9/15/2020	MR	390	0.3 attention to information for upcoming hearing before Judge Lee (.3)	\$	117.00
September-20 Claims Administr	ation &	9/16/2020	AW	140	0.2 responses to emails from claimant (.2)	\$	28.00
Objections September-20 Claims Administr Objections	ation &	9/16/2020	AW	140	0.1 update claimant's contact information per his request and notify claims vendor regarding same (.1)	\$	14.00
September-20 Claims Administr Objections	ation &	9/16/2020	AW	140	0.6 prepare draft notice of receivership to creditor, revise, and serve on creditor (.6).	\$	84.00
September-20 Claims Administr	ation &	9/16/2020	JRW	260	1.1 continue working with A. Watychowicz on chart depicting breakdown of claims (1.1)	\$	286.00
Objections September-20 Claims Administr Objections	ation &	9/16/2020	JRW	260	0.2 further revise draft confidentiality order and related analysis to M. Rachlis (.2)	\$	52.00
September-20 Claims Administr Objections	ation &	9/16/2020	JRW	260	0.3 further revise draft standard discovery requests and related correspondence regarding comments regarding same (.3)	\$	78.00
September-20 Claims Administr	ation &	9/16/2020	MR	390	0.3 Attention to claim related issues regarding upcoming hearing and materials regarding same.	\$	117.00
Objections September-20 Claims Administr Objections	ation &	9/17/2020	JRW	260	1.2 Continue working with A. Watychowicz on charts depicting claims and description of same (1.2)	\$	312.00
September-20 Claims Administr Objections	ation &	9/17/2020	JRW	260	0.4 related email and telephone communications with SEC, K. Duff and M. Rachlis (.4)	\$	104.00
September-20 Claims Administr Objections	ation &	9/17/2020	JRW	260	0.4 telephone conference with SEC (.4)	\$	104.00
September-20 Claims Administr	ation &	9/17/2020	JRW	260	0.4 revise standard discovery requests (.4)	\$	104.00
September-20 Claims Administr Objections	ation &	9/17/2020	JRW	260	0.4 and related telephone conference with M. Rachlis (.4)	\$	104.00
September-20 Claims Administr	ation &	9/17/2020	JRW	260	0.3 revise confidentiality order (.3).	\$	78.00
Objections September-20 Claims Administr Objections	ation &	9/17/2020	MR	390	0.4 Discussions on claims charts with J. Wine and K. Duff (.4)	\$	156.00
September-20 Claims Administr Objections	ation &	9/17/2020	MR	390	0.6 review materials regarding same (.6)	\$	234.00
September-20 Claims Administr Objections	ation &	9/17/2020	MR	390	0.5 attention to standard discovery issues (.5)	\$	195.00
September-20 Claims Administr Objections	ation &	9/17/2020	MR	390	0.4 work on same with J. Wine (.4)	\$	156.00
September-20 Claims Administr Objections	ation &	9/17/2020	MR	390	0.1 attention to confidentiality issues and conferences regarding same (.1).	\$	39.00
September-20 Claims Administr Objections	ation &	9/18/2020	JRW	260	0.2 Confer with M. Rachlis (.2)	\$	52.00
September-20 Claims Administr Objections	ation &	9/18/2020	JRW	260	0.3 and A. Watychowicz (.3) regarding analysis of claims breakdown	\$	78.00
September-20 Claims Administr Objections	ation &	9/18/2020	JRW	260	0.9 related revisions to and correspondence regarding same (.9)	\$	234.00

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ol	bjection
	Claims Administration &	9/18/2020	JRW	on 260	0.3 confer with A. Watychowicz regarding analysis of fund claims to properties (.3)	\$	78.00
September-20	Objections Claims Administration &	9/18/2020	JRW	260	0.3 revisions to standard discovery requests and related correspondence to counsel regarding same (.3)	\$	78.00
September-20	Objections Claims Administration &	9/18/2020	JRW	260	0.1 revise draft confidentiality order to address comments from claimant's counsel (.1).	\$	26.00
September-20	Objections Claims Administration &	9/18/2020	MR	390	1 Attention to issues on charts requested by court regarding breakdown of claims and follow up regarding same (1.0)	\$	390.00
September-20	Objections Claims Administration &	9/18/2020	MR	390	0.3 attention to standard discovery issues (.3)	\$	117.00
September-20	Objections Claims Administration &	9/21/2020	AW	140	0.6 Continued research regarding claims issue discussed with K. Duff, communicate with J. Wine regarding same,	\$	84.00
September-20	Objections Claims Administration &	9/21/2020	AW	140	and follow up with K. Duff about results (.6) 0.8 communicate with J. Wine regarding revisions to charts for Judge Lee and start preparing data for different	\$	112.00
September-20	Objections Claims Administration &	9/21/2020	JRW	260	tranches (.8). 0.2 Email exchange with SEC (.2)	\$	52.00
September-20	Objections Claims Administration &	9/21/2020	JRW	260	0.2 confer with K. Duff regarding analysis of claims by tranche (.2)	\$	52.00
September-20	Objections Claims Administration &	9/21/2020	JRW	260	0.8 and work with A. Watychowicz on same (.8)	\$	208.00
September-20	Objections Claims Administration &	9/21/2020	JRW	260	0.3 telephone conference with SEC (.3)	\$	78.00
September-20	Objections Claims Administration &	9/21/2020	JRW	260	0.3 telephone conference with claimant's counsel regarding claims vendor proposals (.3)	\$	78.00
September-20	Objections Claims Administration &	9/21/2020	JRW	260	2.6 analysis of sales proceeds and claims against properties and communications with K. Duff and M. Rachlis	\$	676.00
September-20	Objections Claims Administration &	9/21/2020	JRW	260	regarding same (2.6) 0.1 confer with K. Duff and M. Rachlis regarding joint status report to the court regarding outstanding discovery matters (.1)	\$	26.00
September-20	Objections Claims Administration & Objections	9/21/2020	JRW	260	0.1 related email to collections counsel (.1).	\$	26.00
September-20	Claims Administration &	9/21/2020	MR	390	1.8 Work on issues to review and edit of pie charts, discovery and joint status report (1.8)	\$	702.00
September-20	Objections Claims Administration & Objections	9/21/2020	MR	390	0.7 further prepare for upcoming hearing (.7).	\$	273.00
September-20	Claims Administration & Objections	9/22/2020	AW	140	0.2 Communicate with K. Duff and J. Wine regarding emails from claimants (.2)	\$	28.00
September-20	Claims Administration & Objections	9/22/2020	AW	140	1.1 communicate with J. Wine regarding revisions to charts for Judge Lee, apply requested revisions, and finalize charts (1.1)	\$	154.00
September-20	Claims Administration & Objections	9/22/2020	AW	140	0.2 attention to narrative regarding charts and communicate with J. Wine regarding proposed revisions (.2)	\$	28.00
September-20	Claims Administration & Objections	9/22/2020	AW	140	0.6 communicate with counsel regarding final revisions and prepare charts for Judge Lee, and file and serve as per service list (.6)	\$	84.00
September-20	Claims Administration & Objections	9/22/2020	AW	140	1.7 attention to nearly finalized joint status report, communicate with counsel regarding final revisions, file with the Court, and serve as per service list (1.7).	\$	238.00
September-20	Claims Administration & Objections	9/22/2020	JRW	260	0.2 Correspond with M. Rachlis and K. Duff regarding revisions to description of charts showing claims breakdown (.2)	\$	52.00
September-20	Claims Administration & Objections	9/22/2020	JRW	260	1.8 revise and finalize same (1.8)	\$	468.00
September-20	Claims Administration & Objections	9/22/2020	JRW	260	0.2 correspond with Judge Lee's clerk regarding claims charts (.2)	\$	52.00
September-20	Claims Administration & Objections	9/22/2020	JRW	260	0.1 review analysis from potential ediscovery vendor and related email to counsel (.1)	\$	26.00
September-20	Claims Administration & Objections	9/22/2020	JRW	260	0.3 exchange emails and revisions of draft standard discovery to investors, draft standard discovery to institutional lenders and draft confidentiality order (.3)	\$	78.00
September-20	Claims Administration & Objections	9/22/2020	JRW	260	4.5 extensive email exchanges and conferences regarding proposed revisions to standard discovery requests, confidentiality order, and related status report (4.5)	\$	1,170.00
September-20	Claims Administration & Objections	9/22/2020	JRW	260	0.4 exchange correspondence with counsel regarding joint status report to court on discovery-related issues (.4).	\$	104.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 105 of 157 PageID #:65138

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	0	bjection
September-20 Claims Administration & Objections	9/22/2020	MR	on 390	8.5 Work on various submissions to the court regarding protective order, standard discovery, charts and various exchanges with K. Duff, J. Wine and A. Porter regarding same and preparation for upcoming hearing.	\$	3,315.00
September-20 Claims Administration & Objections	9/23/2020	AEP	390	0.2 Review proposed discovery requests relating to standard discovery to institutional lenders and correspond with K. Duff, M. Rachlis, and J. Wine.	\$	78.00
September-20 Claims Administration & Objections	9/23/2020	AW	140	0.2 Attention to emails from claimants in response to filed joint status report (.2)	\$	28.00
September-20 Claims Administration & Objections	9/23/2020	AW	140	0.3 communicate with K. Duff and J. Wine regarding same, and respond to emails from claimants (.3)	\$	42.00
September-20 Claims Administration & Objections	9/23/2020	AW	140	0.2 communicate with counsel regarding and response to email from investor claimant (.2)	\$	28.00
September-20 Claims Administration & Objections	9/23/2020	JRW	260	1.5 prepare for hearing on claims process and discovery issues and related telephone conference with K. Duff and M. Rachlis (1.5)	\$	390.00
September-20 Claims Administration & Objections	9/23/2020	JRW	260	1.3 appearance in telephonic hearing before Judge Lee (1.3)	\$	338.00
September-20 Claims Administration & Objections	9/23/2020	JRW	260	0.3 telephone conference with M. Rachlis and K. Duff regarding court's directives (.3)	\$	78.00
September-20 Claims Administration & Objections	9/23/2020	JRW	260	0.3 confer with A. Watychowicz regarding hearing update and preparation of status report regarding pending motions (.3)	\$	78.00
September-20 Claims Administration & Objections	9/23/2020	JRW	260	0.2 and prepare preliminary draft of same (.2)	\$	52.00
September-20 Claims Administration & Objections	9/23/2020	JRW	260	0.1 exchange correspondence with counsel for institutional lenders regarding meet and confer (.1)	\$	26.00
September-20 Claims Administration & Objections	9/23/2020	JRW	260	0.2 study correspondence from A. Porter regarding discovery requests and exchange emails regarding same (.2)	\$	52.00
September-20 Claims Administration & Objections	9/23/2020	JRW	260	0.1 review and revise draft email to claimants regarding investor claimant (.1).	\$	26.00
September-20 Claims Administration & Objections	9/23/2020	MR	390	2.2 Prepare for upcoming hearing (2.2)	\$	858.00
September-20 Claims Administration & Objections	9/23/2020	MR	390	1.8 and confer with J. Wine and K. Duff (1.8)	\$	702.00
September-20 Claims Administration & Objections	9/23/2020	MR	390	1.3 participate in hearing (1.3)	\$	507.00
September-20 Claims Administration & Objections	9/23/2020	MR	390	0.3 additional follow up on standard discovery issues for upcoming meetings (.3)	\$	117.00
September-20 Claims Administration & Objections	9/23/2020	MR	390	0.3 attention to communications with claimant (.3).	\$	117.00
September-20 Claims Administration & Objections	9/24/2020	AEP	390	1.9 Teleconference with M. Rachlis and J. Wine regarding formulation of standard discovery requests to institutional lenders.	\$	741.00
September-20 Claims Administration & Objections	9/24/2020	AW	140	0.1 communicate with J. Wine regarding filed claims (.1)	\$	14.00
September-20 Claims Administration & Objections	9/24/2020	AW	140	1.1 prepare pending motion joint status report per court order and communicate with J. Wine regarding same (1.1)	\$	154.00
September-20 Claims Administration & Objections	9/24/2020	JRW	260	0.3 Exchange correspondence with A. Watychowicz and K. Duff regarding standard response to claimants' FAQ regarding draft discovery (.3)	\$	78.00
September-20 Claims Administration & Objections	9/24/2020	JRW	260	1.5 confer with M. Rachlis and A. Porter regarding standard discovery requests (1.5)	\$	390.00
September-20 Claims Administration & Objections	9/24/2020	JRW	260	0.8 work with M. Rachlis on revision of standard discovery requests (.8)	\$	208.00
September-20 Claims Administration & Objections	9/24/2020	JRW	260	0.4 draft email to claimants regarding circulation of contact information for claimant pursuant to court order (.4)	\$	104.00
September-20 Claims Administration & Objections	9/24/2020	JRW	260	0.1 and related exchange of revisions to same (.1).	\$	26.00
September-20 Claims Administration & Objections	9/24/2020	MR	390	1 Prepare for meetings on standard discovery (1.0)	\$	390.00
September-20 Claims Administration & Objections	9/24/2020	MR	390	1.4 further work on revisions to same (1.4)	\$	546.00

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
	Keeper	Rate	Hours	Descripti on	Cost		
September-20 Claims Admi Objections	inistration &	9/24/2020	MR	390	0.3 review and comment on email communication to claimants (.3)	\$	117.00
September-20 Claims Admi Objections	inistration &	9/24/2020	MR	390	0.2 review court order regarding issues above (.2).	\$	78.00
September-20 Claims Admi Objections	inistration &	9/25/2020	AW	140	0.4 Communicate with counsel regarding email to all claimants, prepare same, and serve requested email pursuant to court order (.4)	\$	56.00
September-20 Claims Admi Objections	inistration &	9/25/2020	AW	140	1.2 responses to claimants' emails in response to notification regarding claimant's contact information that was shared pursuant to Court's order and joint status report (1.2)	\$	168.00
September-20 Claims Admi Objections	inistration &	9/25/2020	AW	140	correspond with claimant regarding her not submitting claim, communicate with K. Duff regarding same, and communicate with potential claimant regarding bar date (.5)	\$	70.00
September-20 Claims Admi Objections	inistration &	9/25/2020	JRW	260	0.2 Revise standard discovery to institutional lenders and related email to counsel in advance of conference (.2)	\$	52.00
September-20 Claims Admi Objections	inistration &	9/25/2020	JRW	260	1.5 conference with counsel for institutional lenders, counsel for SEC and M. Rachlis (1.5)	\$	390.00
September-20 Claims Admi Objections	inistration &	9/25/2020	JRW	260	0.5 further work with M. Rachlis on standard discovery issues (.5)	\$	130.00
September-20 Claims Admi Objections	inistration &	9/25/2020	JRW	260	0.3 related correspondence with counsel for institutional lenders (.3)	\$	78.00
September-20 Claims Admi Objections	inistration &	9/25/2020	JRW	260	0.2 and with A. Watychowicz regarding process for discovery (.2)	\$	52.00
September-20 Claims Admi Objections	inistration &	9/25/2020	JRW	260	0.3 work with A. Watychowicz on investigation of and response to inquiry from claimant (.3)	\$	78.00
September-20 Claims Admi Objections	inistration &	9/25/2020	JRW	260	0.3 telephone conference with A. Watychowicz regarding processes for claims and discovery (.3).	\$	78.00
September-20 Claims Admi	inistration &	9/25/2020	MR	390	1.5 Participate in conference regarding discovery (1.5)	\$	585.00
Objections September-20 Claims Admi Objections	inistration &	9/25/2020	MR	390	3 research regarding discovery and review discovery and work on various issues regarding same to further revise standard discovery (3.0)	\$	1,170.00
September-20 Claims Admi	inistration &	9/28/2020	AW	140	0.1 Update claimant's contact info and correspond with claims vendor regarding same (.1)	\$	14.00
Objections September-20 Claims Admi	inistration &	9/28/2020	AW	140	0.8 review claims and respond to update requests from claimants (.8)	\$	112.00
Objections September-20 Claims Admi	inistration &	9/28/2020	AW	140	0.8 work with J. Wine on revisions to joint status report regarding pending motions (.8)	\$	112.00
Objections September-20 Claims Admi	inistration &	9/28/2020	JRW	260	0.1 Confer with A. Watychowicz regarding logistics for providing discovery to claimants (.1)	\$	26.00
Objections September-20 Claims Admi	inistration &	9/28/2020	JRW	260	1.9 study and revise draft of joint motion to resolve discovery disputes (1.9)	\$	494.00
Objections September-20 Claims Admi	inistration &	9/28/2020	JRW	260	0.5 work with A. Watychowicz to prepare status report to court on pending motions and incorporate comments	\$	130.00
Objections September-20 Claims Admi	inistration &	9/29/2020	AW	140	regarding same (.5). 0.4 continue work on revisions to joint status report regarding pending motions (.4).	\$	56.00
Objections September-20 Claims Admi	inistration &	9/29/2020	JRW	260	1.3 Continue revision to standard discovery requests to institutional lenders and investors (1.3)	\$	338.00
Objections September-20 Claims Admi	inistration &	9/29/2020	JRW	260	0.9 continued drafting and revision of position statement regarding standard discovery requests (.9)	\$	234.00
Objections September-20 Claims Admi	inistration &	9/29/2020	JRW	260	0.7 telephone conferences with M. Rachlis regarding discovery and joint motion (.7)	\$	182.00
Objections September-20 Claims Admi	inistration &	9/29/2020	JRW	260	0.3 review revision to standard discovery from institutional lenders and related correspondence to counsel (.3)	\$	78.00
Objections September-20 Claims Admi	inistration &	9/29/2020	JRW	260	0.3 additional revisions to joint update on pending motions and related discussions with K. Duff and M. Rachlis	\$	78.00
Objections September-20 Claims Admi	inistration &	9/29/2020	MR	390	(.3).Work on standard discovery issues and motion to resolve issues and follow up regarding same (3.0)	\$	1,170.00
Objections September-20 Claims Admi	inistration &	9/29/2020	MR	390	0.7 conferences regarding discovery and joint motion with J. Wine (.7)	\$	273.00
Objections September-20 Claims Admi Objections	inistration &	9/29/2020	MR	390	0.4 attention to issues on joint report on pending motions (.4).	\$	156.00

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Q	bjection
	Keeper	Rate	Hours	Descripti	Cost		
	Claims Administration & Objections	9/30/2020	JRW	on 260	2.1 Continued revision of and discussion regarding standard discovery requests and related correspondence with counsel for institutional lender claimants regarding same (2.1)	\$	546.00
September-20	Claims Administration & Objections	9/30/2020	JRW	260	0.3 exchange of correspondence with counsel for SEC (.3)	\$	78.00
September-20	Claims Administration & Objections	9/30/2020	JRW	260	0.2 telephone conference and exchange of correspondence with counsel for institutional lender claimants regarding joint report on pending motions (.2)	\$	52.00
September-20	Claims Administration & Objections	9/30/2020	JRW	260	and related communications with M. Rachlis and K. Duff regarding formulation of response to proposed additions and exchange of redline draft (1.0).	\$	260.00
September-20	Claims Administration & Objections	9/30/2020	MR	390	2.5 Attention to standard discovery related issues and various drafts and edits.	\$	975.00
October-20	Claims Administration & Objections	10/1/2020	KBD	390	1 Confer and exchange correspondence with M. Rachlis and J. Wine regarding claims process, standard discovery, joint report on open issues, turnover motion, and various related issues (1.0)	\$	390.00
October-20	Claims Administration & Objections	10/1/2020	KBD	390	0.8 study and revise joint status report on open issues and standard discovery requests (.8)	\$	312.00
October-20	Claims Administration & Objections	10/1/2020	KBD	390	0.1 attention claimant communication and exchange correspondence with A. Watychowicz regarding same (.1).	\$	39.00
October-20	Claims Administration &	10/2/2020	KBD	390	0.5 Study and revise standard discovery requests and exchange correspondence with J. Wine and M. Rachlis	\$	195.00
October-20	Objections Claims Administration &	10/2/2020	KBD	390	regarding same (.5) 0.5 study and revise joint motion regarding standard discovery and exchange correspondence regarding same (.5)	\$	195.00
October-20	Objections Claims Administration &	10/2/2020	KBD	390	0.2 telephone conference with J. Wine regarding instructions in investor lender standard discovery requests (.2)	\$	78.00
October-20	Objections Claims Administration &	10/8/2020	KBD	390	0.3 attention to communications from claimants (.3).	\$	117.00
October-20	Objections Claims Administration &	10/10/2020	KBD	390	0.2 Study institutional lender proposal regarding EquityBuild documents and exchange correspondence with	\$	78.00
October-20	Objections Claims Administration &	10/12/2020	KBD	390	regarding same. 0.1 work on communications with claimants (.1)	\$	39.00
October-20	Objections Claims Administration &	10/12/2020	KBD	390	0.4 study motion for reconsideration (.4).	\$	156.00
October-20	Objections Claims Administration &	10/15/2020	KBD	390	0.5 Draft correspondence to claimant's counsel regarding proof of claim forms and EB documents and exchange	\$	195.00
October-20	Objections Claims Administration &	10/15/2020	KBD	390	correspondence with M. Rachlis regarding same (.5) 0.3 study claims by property (.3).	\$	117.00
October-20	Objections Claims Administration &	10/20/2020	KBD	390	0.4 Draft correspondence to M. Rachlis regarding summary proceedings (.4)	\$	156.00
October-20	Objections Claims Administration &	10/20/2020	KBD	390	0.4 attention to response to motion for reconsideration and study correspondence regarding same (.4)	\$	156.00
October-20	Objections Claims Administration &	10/22/2020	KBD	390	3.7 Work on response to claimants motion for reconsideration.	\$	1,443.00
October-20	Objections Claims Administration &	10/23/2020	KBD	390	2.8 Draft and revise response to claimants' motion for reconsideration, and draft correspondence to M. Rachlis	\$	1,092.00
October-20	Objections Claims Administration &	10/23/2020	KBD	390	regarding same (2.8) 1.3 study hearing transcripts, draft correspondence, and evaluate claimants' proposal for document data base and	\$	507.00
October-20	Objections Claims Administration &	10/23/2020	KBD	390	cost sharing (1.3) 0.1 study correspondence from claimant regarding institutional lenders and discovery (.1).	\$	39.00
October-20	Objections Claims Administration &	10/24/2020	KBD	390	1.7 Draft and revise response to claimants' motion for reconsideration, and exchange correspondence with M.	\$	663.00
October-20	Objections Claims Administration &	10/25/2020	KBD	390	Rachlis regarding same. 1.9 Draft and revise response to claimants' motion for reconsideration and exchange correspondence with M.	\$	741.00
October-20	Objections Claims Administration &	10/25/2020	KBD	390	Rachlis regarding same (1.9) 0.1 review correspondence regarding EB documents for repository (.1).	\$	39.00
October-20	Objections Claims Administration &	10/26/2020	KBD	390	1.6 Draft and revise response to claimants' motion for reconsideration and exchange correspondence with M.	\$	624.00
October-20	Objections Claims Administration &	10/26/2020	KBD	390	Rachlis and J. Wine regarding same (1.6) 0.2 study SEC opposition to motion for reconsideration (.2)	\$	78.00
October-20	Objections Claims Administration & Objections	10/26/2020	KBD	390	0.5 prepare for hearing on claims before Judge Lee and exchange correspondence regarding same (.5).	\$	195.00

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
	Keeper	Rate	Hours	Descripti on	Cost		
	Claims Administration & Objections	10/27/2020	KBD	390	1.1 Prepare for hearing before Judge Lee on claims (1.1)	\$	429.00
	Claims Administration & Objections	10/27/2020	KBD	390	1 work on claims process planning and progression of review (1.0)	\$	390.00
October-20	Claims Administration & Objections	10/27/2020	KBD	390	0.8 confer with M. Rachlis and J. Wine regarding issues relating to hearing before Judge Lee (.8)	\$	312.00
October-20	Claims Administration & Objections	10/27/2020	KBD	390	2.3 appear at hearing before Judge Lee (2.3)	\$	897.00
October-20	Claims Administration & Objections	10/27/2020	KBD	390	0.3 confer with M. Rachlis regarding hearing before Judge Lee (.3)	\$	117.00
October-20	Claims Administration & Objections	10/29/2020	KBD	390	1.1 Work on communications with claimants regarding claims process and standard discovery (1.1)	\$	429.00
October-20	Claims Administration & Objections	10/30/2020	KBD	390	0.2 exchange correspondence with J. Wine and A. Watychowicz regarding service of information relating to claims (.2)	\$	78.00
October-20	Claims Administration & Objections	10/30/2020	KBD	390	1.2 work on communications with claimants regarding claims process (1.2)	\$	468.00
	Asset Disposition	10/16/2020	JR	140	0.2 and property manager liens and expenses (.2)	\$	28.00
	Asset Disposition	10/22/2020	AW	140	0.9 Study draft response to motion to reconsider and communicate with M. Rachlis regarding revisions.	\$	126.00
October-20	Asset Disposition	10/30/2020	AEP	390	0.1 additional correspondence with J. Wine regarding potential negotiation of resolution of administrative proceedings pending against receivership property (.1)	\$	39.00
October-20	Business Operations	10/21/2020	AW	140	0.2 Call with J. Wine regarding access to online platforms (.2)	\$	28.00
October-20	Business Operations	10/21/2020	AW	140	0.1 communicate with K. Duff regarding transcripts of various proceedings (.1).	\$	14.00
October-20	Business Operations	10/21/2020	ED	390	0.3 and related email correspondence (.3)	\$	117.00
October-20	Business Operations	10/21/2020	ED	390	0.1 confer with A. Watychowicz to request document relating to properties to be discussed (.1).	\$	39.00
October-20	Business Operations	10/26/2020	JRW	260	0.2 update team regarding general order from City of Chicago Department of Administrative hearings regarding hearings in Department of Buildings matters (.2).	\$	52.00
October-20	Business Operations	10/30/2020	KMP	140	0.2 communicate with K. Duff regarding preservation of records (.2).	\$	28.00
	Claims Administration & Objections	10/1/2020	AW	140	0.1 Respond to claimant's email and voice message regarding discovery (.1)	\$	14.00
	Claims Administration & Objections	10/1/2020	AW	140	0.2 attention to email exchanges with lenders' counsel regarding discovery motion and joint status on pending motions (.2).	\$	28.00
	Claims Administration & Objections	10/1/2020	JRW	260	0.2 telephone conference with claimants' counsel regarding joint motion regarding pending matters for disposition (.2)	\$	52.00
October-20	Claims Administration & Objections	10/1/2020	JRW	260	0.9 revise and finalize same and related email exchanges with claimants' counsel, EB team and SEC (.9)	\$	234.00
October-20	Claims Administration & Objections	10/1/2020	JRW	260	0.5 prepare list of scheduling issues for claims process (.5)	\$	130.00
October-20	Claims Administration & Objections	10/1/2020	JRW	260	1 telephone conference with M. Rachlis and K. Duff regarding joint report on pending motions, turnover motion, standard discovery and related position statement (1.0)	\$	260.00
October-20	Claims Administration & Objections	10/1/2020	JRW	260	0.4 review of briefing on claims motion (.4)	\$	104.00
	Claims Administration & Objections	10/1/2020	JRW	260	1.6 continue working on motion setting forth participants' discovery positions (1.6)	\$	416.00
	Claims Administration & Objections	10/1/2020	JRW	260	1.7 study latest draft of standard discovery requests to investors from institutional lenders' counsel and related analysis and communications with M. Rachlis and K. Duff (1.7)	\$	442.00
	Claims Administration & Objections	10/1/2020	JRW	260	0.5 prepare exhibits to discovery motion (.5).	\$	130.00
October-20	Claims Administration & Objections	10/1/2020	MR	390	3.7 Review and revise several drafts of claims process standard discovery and follow up communications regarding same (3.7)	\$	1,443.00
October-20	Claims Administration & Objections	10/1/2020	MR	390	1 conference with K. Duff and J. Wine regarding claims process, standard discovery, joint submission and related issues (1.0)	\$	390.00
October-20	Claims Administration & Objections	10/2/2020	AW	140	O.2 Attention to email from claimant regarding address update, update contact list, and communicate with claims vendor regarding same (.2)	\$	28.00
October-20	Claims Administration & Objections	10/2/2020	AW	140	0.1 respond to claimant's email and voice message regarding discovery (.1)	\$	14.00
October-20	Claims Administration & Objections	10/2/2020	AW	140	1.6 work with J. Wine on revisions and finalization of joint status on pending motions and discovery motion (1.6)	\$	224.00

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	0	bjection
October-20 Claims Administration &	10/2/2020	AW	on 140	0.3 file and serve as per service list (.3).	\$	42.00
Objections		JRW			\$	52.00
October-20 Claims Administration & Objections	10/2/2020		260	0.2 Finalize joint statement regarding pending motions for filing and related exchange with counsel (.2)		
October-20 Claims Administration & Objections	10/2/2020	JRW	260	1.8 analyze new discovery requests proposed by claimants and update joint motion regarding same (1.8)	\$	468.00
October-20 Claims Administration & Objections	10/2/2020	JRW	260	0.4 review drafts and comment on response to motion and related conference with K. Duff (.4)	\$	104.00
October-20 Claims Administration & Objections	10/2/2020	JRW	260	1 work with M. Rachlis on joint report to Court regarding discovery and framework for same (1.0)	\$	260.00
October-20 Claims Administration & Objections	10/2/2020	JRW	260	1.6 work with M. Rachlis to revise standard discovery requests to investors (1.6)	\$	416.00
October-20 Claims Administration & Objections	10/2/2020	JRW	260	0.4 various emails and telephone conference with claimants' counsel regarding discovery requests, joint motion and exhibits (.4)	\$	104.00
October-20 Claims Administration & Objections	10/2/2020	JRW	260	0.4 conferences with A. Watychowicz regarding service issues and filings (.4)	\$	104.00
October-20 Claims Administration & Objections	10/2/2020	JRW	260	0.9 incorporate arguments from claimants into joint report and finalize same for filing (.9).	\$	234.00
October-20 Claims Administration & Objections	10/2/2020	MR	390	3.9 Further work and review of various joint status report, standard discovery and related issues including exchanges with J. Wine regarding these issues (3.9)	\$	1,521.00
October-20 Claims Administration & Objections	10/8/2020	AW	140	0.1 Respond to claimant's email regarding discovery and update (.1)	\$	14.00
October-20 Claims Administration & Objections	10/8/2020	AW	140	0.2 attention to email from claimant regarding address update, update contact list, and communicate with claims vendor regarding same (.2)	\$	28.00
October-20 Claims Administration &	10/8/2020	AW	140	0.5 communicate with J. Wine regarding claimant's premature submission, review and respond to claimant's email	\$	70.00
Objections October-20 Claims Administration & Objections	10/8/2020	AW	140	regarding discovery (.5) 0.1 communicate with K. Duff and J. Wine regarding emails from claimants (.1).	\$	14.00
October-20 Claims Administration & Objections	10/8/2020	JRW	260	0.8 confer with A. Watychowicz regarding claimant inquiries (.3), review of discovery responses and document images from claimant and draft proposed response to same (.5)	\$	208.00
October-20 Claims Administration & Objections	10/9/2020	AW	140	0.1 Respond to claimant's email regarding discovery (.1)	\$	14.00
October-20 Claims Administration & Objections	10/9/2020	JRW	260	0.4 review proposal filed by claimants and related email to K. Duff, M. Rachlis and A. Watychowicz (.4)	\$	104.00
October-20 Claims Administration & Objections	10/9/2020	MR	390	0.2 Attention to proposal and issues regarding proposal for EB document library.	\$	78.00
October-20 Claims Administration &	10/12/2020	AW	140	O.2 Attention to follow up email from claimant, communicate with K. Duff and J. Wine regarding same, and respond to email requesting tax update.	\$	28.00
Objections October-20 Claims Administration &	10/12/2020	MR	390	0.5 Attention to claimants' reconsideration motion.	\$	195.00
Objections October-20 Claims Administration &	10/13/2020	AW	140	0.1 Attention to follow up email from claimant, communicate with K. Duff and J. Wine regarding same, and	\$	14.00
Objections October-20 Claims Administration &	10/13/2020	JRW	260	respond to email requesting several updates (.1) 0.3 Study claimants' motion to reconsider (.3)	\$	78.00
Objections October-20 Claims Administration &	10/13/2020	JRW	260	0.3 review case law regarding potential issue (.3).	\$	78.00
Objections October-20 Claims Administration &	10/14/2020	AW	140	0.2 respond to emails from claimants regarding update request and discovery issues (.2).	\$	28.00
Objections October-20 Claims Administration &	10/14/2020	MR	390	0.3 Work on draft communication on claims process discovery (.3)	\$	117.00
Objections October-20 Claims Administration & Objections	10/15/2020	AW	140	0.2 Communicate with K. Duff and J. Wine regarding claims process emailing issues (.2)	\$	28.00
October-20 Claims Administration &	10/15/2020	AW	140	1.7 email claimants to request email address update and mail letter notices to claimants (1.7)	\$	238.00
Objections October-20 Claims Administration & Objections	10/15/2020	AW	140	3.4 work on bounced emails project relating to claims process communications and call with J. Wine regarding	\$	476.00
Objections October-20 Claims Administration & Objections	10/15/2020	JRW	260	same (3.4). 0.5 Telephone conference with K. Duff regarding claims process and legal authority (.5)	\$	130.00

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
	Keeper	Rate	Hours	Descripti on	Cost		
	Claims Administration & Objections	10/15/2020	JRW	260	0.3 telephone conference with A. Watychowicz regarding communications to claimants regarding invalid email addresses (.3).	\$	78.00
	Claims Administration & Objections	10/15/2020	MR	390	0.2 Further attention to discovery related issues.	\$	78.00
October-20	Claims Administration & Objections	10/19/2020	AW	140	0.7 Attention to emails from claimants who responded to email update request, update emailing list, and notify claims vendors regarding same (.7)	\$	98.00
October-20	Claims Administration & Objections	10/19/2020	AW	140	0.1 respond to email from claimant regarding discovery issues (.1).	\$	14.00
October-20	Claims Administration & Objections	10/19/2020	MR	390	2 Research and attention to response to reconsideration motion.	\$	780.00
October-20	Claims Administration & Objections	10/20/2020	MR	390	3 Further work on response on motion for reconsideration.	\$	1,170.00
October-20	Claims Administration & Objections	10/21/2020	MR	390	5 Further work to respond to motion for reconsideration and research various issues regarding same.	\$	1,950.00
October-20	Claims Administration & Objections	10/22/2020	MR	390	0.2 Further attention to motion for reconsideration.	\$	78.00
October-20	Claims Administration & Objections	10/23/2020	MR	390	1.4 Further work on response on motion for reconsideration (1.4)	\$	546.00
October-20	Claims Administration &	10/23/2020	MR	390	0.3 attention to turnover motion and upcoming issues for hearing on claims process (.3).	\$	117.00
October-20	Objections Claims Administration & Objections	10/24/2020	MR	390	0.3 Follow up on issues on draft motion for reconsideration and follow up with K. Duff regarding same.	\$	117.00
October-20	Objections Claims Administration & Objections	10/25/2020	MR	390	0.4 further work on motion for reconsideration and follow up with K. Duff (.4).	\$	156.00
October-20	Objections Claims Administration & Objections	10/26/2020	AW	140	0.1 Attention to emails from claimants who responded to email update request (.1)	\$	14.00
October-20	Objections Claims Administration & Objections	10/26/2020	AW	140	0.1 follow up with J. Wine regarding response to proposal for EquityBuild documents (.1)	\$	14.00
October-20	Claims Administration & Objections	10/26/2020	AW	140	1.1 study response to motion to reconsider and email counsel regarding revisions (1.1)	\$	154.00
October-20	Claims Administration & Objections	10/26/2020	AW	140	0.7 further revisions to same (.7)	\$	98.00
October-20	Claims Administration & Objections	10/26/2020	AW	140	0.7 work to finalize response, file with court, and serve as per service list (.7).	\$	98.00
October-20	Claims Administration & Objections	10/26/2020	JRW	260	1.7 Review and work with M. Rachlis and K. Duff on revision and finalization of response to motion to reconsider (1.7)	\$	442.00
October-20	Claims Administration & Objections	10/26/2020	JRW	260	2.1 work with M. Rachlis on response to institutional lenders' proposal for EquityBuild documents (2.1)	\$	546.00
October-20	Objections Claims Administration & Objections	10/26/2020	JRW	260	0.3 exchange correspondence with K. Duff regarding document vendor proposal and related review of same (.3)	\$	78.00
October-20	Claims Administration & Objections	10/26/2020	JRW	260	0.2 email exchange with M. Rachlis regarding upcoming hearing on issues relating to claims process (.2)	\$	52.00
October-20	Objections Claims Administration & Objections	10/26/2020	MR	390	1.2 Further work on motion for reconsideration issues (1.2)	\$	468.00
October-20	Objections Claims Administration & Objections	10/26/2020	MR	390	1.3 further prepare for upcoming hearing on claims process (1.3).	\$	507.00
October-20	Claims Administration &	10/27/2020	AW	140	0.7 include additional final revisions, finalize response, file with Court, and serve as per service list (.7)	\$	98.00
October-20	Objections Claims Administration &	10/27/2020	AW	140	0.2 communicate with K. Duff and J. Wine regarding claimants' response to service of response to proposal for	\$	28.00
October-20	Objections Claims Administration &	10/27/2020	AW	140	EquityBuild documents (.2) 0.2 follow up with K. Duff and J. Wine regarding requests for update and discovery issues from claimants (.2)	\$	28.00
October-20	Objections Claims Administration &	10/27/2020	JRW	260	0.4 Review, revise and finalize response to proposal for EquityBuild documents (.3) and related exchange	\$	104.00
October-20	Objections Claims Administration &	10/27/2020	JRW	260	regarding service (.1) 1.6 study standard claims process discovery, joint submissions, motion and objections in preparation for hearing	\$	416.00
October-20	Objections Claims Administration & Objections	10/27/2020	JRW	260	on claims process motion (1.6) 0.1 telephone conference with claimant's counsel regarding discovery dispute (.1)	\$	26.00

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Q	bjection
	Keeper	Rate	Hours	Descripti	Cost		,
	Claims Administration & Objections	10/27/2020	JRW	on 260	0.9 conference call with M. Rachlis and K. Duff regarding court's orders and preparation for hearing (.9)	\$	234.00
October-20	Claims Administration & Objections	10/27/2020	JRW	260	0.1 exchange correspondence with potential vendor regarding status of project and pending motion (.1)	\$	26.00
	Claims Administration & Objections	10/27/2020	JRW	260	2.4 attend telephonic hearing before Judge Lee regarding claims process (2.4).	\$	624.00
October-20	Claims Administration & Objections	10/29/2020	AEP	390	1.1 Teleconference with EquityBuild investor regarding procedural status of litigation, claims process, factual background of transactions in which funds were invested, and timeline to completion.	\$	429.00
October-20	Claims Administration & Objections	10/29/2020	AW	140	0.3 Respond to claimants' inquiries about discovery (.2) and about confirming their claims (.1)	\$	42.00
	Claims Administration & Objections	10/29/2020	AW	140	0.3 work with K. Duff and J. Wine on updated responses to claimants inquiring about status report (.3).	\$	42.00
	Claims Administration & Objections	10/30/2020	AW	140	0.3 attention to emails from claimants in response to served status report, review claims, and communicate with K. Duff and J. Wine regarding proposed revisions to master claims list (.3).	\$	42.00
	Claims Administration & Objections	10/30/2020	JRW	260	0.1 Exchange correspondence regarding proposed vendor (.1)	\$	26.00
	Business Operations	11/20/2020	KBD	390	0.1 exchange correspondence regarding post-sale accounting reconciliation (.1).	\$	39.00
	Claims Administration & Objections	11/2/2020	KBD	390	0.4 Exchange correspondence with J. Wine regarding production of EB claim forms and EB documents (.4)	\$	156.00
	Claims Administration & Objections	11/2/2020	KBD	390	0.7 review draft correspondence to claimants and exchange correspondence regarding same and proposed standard responses to FAQ (.7)	\$	273.00
	Claims Administration & Objections	11/3/2020	KBD	390	0.8 Work on communication with claimants and responses to FAQ (.8)	\$	312.00
	Claims Administration & Objections	11/3/2020	KBD	390	0.1 study claimants' motion for reconsideration (.1)	\$	39.00
	Claims Administration & Objections	11/11/2020	KBD	390	0.6 study revised claims process outline and standard discovery requests (.6).	\$	234.00
	Claims Administration & Objections	11/23/2020	KBD	390	0.5 Study and revise draft response to claimants' motion for protective order (.5)	\$	195.00
	Claims Administration & Objections	11/24/2020	KBD	390	2.4 Study and revise draft response to claimants' motion for protective order (2.4)	\$	936.00
	Claims Administration & Objections	11/25/2020	KBD	390	3.5 Confer and exchange correspondence with M. Rachlis and J. Wine regarding claims process logistics and planning (3.5)	\$	1,365.00
	Claims Administration & Objections	11/30/2020	KBD	390	0.3 Work on potential resolution of claims and exchange correspondence regarding same (.3)	\$	117.00
November-20	Asset Disposition	11/6/2020	JR	140	0.1 Exchange correspondence with property management requesting additional tax payment information related to EquityBuild estate (.1)	\$	14.00
	Asset Disposition	11/6/2020	JR	140	3.8 review closing statements from closed properties and determine overall total tax payment for each property, update report (3.8)	\$	532.00
	Asset Disposition	11/6/2020	JR	140	0.2 review tax payments completed by property management and update report (.2)	\$	28.00
	Asset Disposition	11/6/2020 11/11/2020	JR JR	140 140	0.3 exchange correspondence with K. Duff and K. Pritchard regarding same (.3).0.2 review email from property management regarding tax payments to date by property management and update	\$ \$	42.00 28.00
	Asset Disposition				electronic files (.2).	·	
	Business Operations	11/3/2020	AW	140	0.1 Communicate with A. Porter regarding recorded mortgage documents (8043 S Hermitage) (.1)	\$	14.00
	Business Operations	11/10/2020	JRW	260	0.4 research and email exchange with A. Porter regarding notice of violation (1449 N. Talman) (.4)	\$	104.00
	Business Operations	11/24/2020	JRW	260	0.6 Correspondence to City of Chicago ownership dispute division regarding notice of code violation (1449 N Talman) and injunction against proceedings.	\$	156.00
	Business Operations	11/25/2020	JRW	260	0.1 Review nonsuit order (1449 N. Talman) and related email exchange (.1)	\$	26.00
	Claims Administration & Objections	11/2/2020	AW	140	3.4 Attention to numerous emails from claimants, review same, communicate with J. Wine and K. Duff regarding proposed responses and solutions, respond to number of claimants (3.4)	\$	476.00
	Claims Administration & Objections	11/2/2020	AW	140	0.5 review status reports and communicate with K. Duff regarding master claims list and formats of same (.5)	\$	70.00
	Claims Administration & Objections	11/2/2020	AW	140	0.2 exchange communications with counsel regarding discovery requests to investors (.2).	\$	28.00
November-20	Claims Administration & Objections	11/2/2020	MR	390	0.1 attention to other communications on claims library and issues regarding distribution of claims information (.1).	\$	39.00
	Claims Administration & Objections	11/5/2020	JRW	260	1 Attend training session with e-discovery vendor (1.0)	\$	260.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 112 of 157 PageID #:65145

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
	Keeper	Rate	Hours	Descripti on	Cost		
	Claims Administration & Objections	11/9/2020	JRW	260	0.5 conference call with A. Porter, K. Duff and M. Rachlis regarding claims process and discovery of EquityBuild documents (.5)	\$	130.00
	Claims Administration & Objections	11/9/2020	JRW	260	0.4 review court order regarding claims process motion and related telephone conference with claimants' counsel (.2) and exchange with K. Duff and M. Rachlis (.2).	\$	104.00
November-20	Claims Administration & Objections	11/9/2020	MR	390	0.4 attention to communications regarding claims process (.4)	\$	156.00
November-20	Claims Administration & Objections	11/10/2020	JRW	260	0.8 Work on modified claims process for discussion with claimants' counsel (.8)	\$	208.00
November-20	Claims Administration & Objections	11/11/2020	AW	140	0.2 Communicate with J. Wine regarding revised response to claimant, claimant's comments, and claimant's estate issues (.2)	\$	28.00
November-20	Claims Administration & Objections	11/11/2020	AW	140	0.2 respond to emails from claimant (.2).	\$	28.00
November-20	Claims Administration & Objections	11/11/2020	JRW	260	0.5 revise standard discovery requests per court's oral rulings (.5)	\$	130.00
November-20	Claims Administration & Objections	11/12/2020	JRW	260	0.2 Email exchange with M. Rachlis and K. Duff regarding claimants' request for claims documentation (.2)	\$	52.00
November-20	Claims Administration & Objections	11/12/2020	JRW	260	0.7 work with A. Watychowicz on identifying number of claimants and related review of prior analyses (.7).	\$	182.00
November-20	Claims Administration & Objections	11/12/2020	MR	390	0.2 attention to email exchange with K. Duff and J. Wine regarding claims documents (.2).	\$	78.00
November-20	Claims Administration & Objections	11/13/2020	MR	390	0.5 Telephone conference with SEC (.5)	\$	195.00
November-20	Claims Administration & Objections	11/13/2020	MR	390	0.2 attention to issues regarding production of claims materials (.2).	\$	78.00
November-20	Claims Administration & Objections	11/16/2020	MR	390	0.5 Conference with SEC and K. Duff (.5)	\$	195.00
November-20	Claims Administration & Objections	11/17/2020	JRW	260	0.1 Email exchange with A. Porter and related research regarding claim (.1)	\$	26.00
November-20	Claims Administration & Objections	11/17/2020	JRW	260	0.1 confer with M. Rachlis regarding response to claimants' motion for protective order (.1).	\$	26.00
November-20	Claims Administration & Objections	11/18/2020	JRW	260	0.3 Review K. Duff outline regarding claims process and related communications with K. Duff and M. Rachlis (.3)	\$	78.00
November-20	Claims Administration & Objections	11/18/2020	JRW	260	0.7 review proposal from potential e-discovery vendor (.2) and related telephone conference with claimants' counsel (.5)	\$	182.00
November-20	Claims Administration & Objections	11/18/2020	JRW	260	0.5 revise standard discovery requests to investors in accordance with court's oral rulings (.4) and correspondence to claimants' counsel regarding same (.1)	\$	130.00
November-20	Claims Administration & Objections	11/18/2020	JRW	260	2.3 legal research for response to claimants' motion for protective order (2.3)	\$	598.00
November-20	Claims Administration & Objections	11/19/2020	AW	140	0.1 Communicate with J. Wine regrading change of custodian for one of claimants and revise master claims list accordingly (.1)	\$	14.00
November-20	Claims Administration & Objections	11/19/2020	JRW	260	0.2 review motion for protective order and confer with M. Rachlis regarding same (.2).	\$	52.00
November-20	Claims Administration & Objections	11/19/2020	MR	390	0.3 conference with J. Wine regarding response to motion for protective order and related items and review of same (.3).	\$	117.00
November-20	Claims Administration & Objections	11/21/2020	JRW	260	1.8 legal research and drafting of response to claimants' motion for protective order (1.8).	\$	468.00
November-20	Claims Administration & Objections	11/22/2020	JRW	260	3.9 Drafting of opposition to motion for protective order.	\$	1,014.00
November-20	Claims Administration & Objections	11/23/2020	AW	140	0.1 Follow up with K. Duff and J. Wine regarding repeated emails from claimant and respond to same (.1)	\$	14.00
November-20	Claims Administration & Objections	11/23/2020	AW	140	0.2 research regarding decisions in support of objection to institutional lenders' motion for protective order and email J. Wine regarding same (.2).	\$	28.00
November-20	Claims Administration & Objections	11/23/2020	JRW	260	5.9 Legal research and drafting of response to motion for protective order (5.9)	\$	1,534.00
November-20	Claims Administration & Objections	11/23/2020	JRW	260	0.2 exchange correspondence with claimant's counsel regarding claims process (.2).	\$	52.00
November-20	Claims Administration & Objections	11/23/2020	MR	390	1.3 Attention to opposition to motion for protective order (1.3)	\$	507.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 113 of 157 PageID #:65146

Entry Date Time Keepe	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	O	bjection
November-20 Claims Administration	on & 11/24/2020	AW	on 140	1.4 attention to opposition to motion for protective order, proofread same, and email counsel regarding revisions (1.4)	\$	196.00
November-20 Claims Administration Objections	on & 11/24/2020	JRW	260	1.8 Additional legal research for response to motion for protective order (1.8)	\$	468.00
November-20 Claims Administration Objections	on & 11/24/2020	JRW	260	1.7 review redlines, further revise, and finalize same for filing (1.7)	\$	442.00
November-20 Claims Administration Objections	on & 11/24/2020	JRW	260	0.1 review correspondence from e-discovery vendor regarding procedure for entering confidentiality agreement(.1)	\$	26.00
November-20 Claims Administration Objections	on & 11/24/2020	JRW	260	0.2 exchange correspondence with counsel for claimants' regarding claims documentation and related exchange with K. Duff and M. Rachlis (.2)	\$	52.00
November-20 Claims Administration Objections	on & 11/24/2020	JRW	260	0.1 review transcript of October 27 proceedings (.1).	\$	26.00
November-20 Claims Administration Objections	on & 11/24/2020	MR	390	2.8 Work on brief in opposition to motion for protective order, review and revise same, and review decisions regarding same (2.8)	\$	1,092.00
November-20 Claims Administration Objections	on & 11/24/2020	MR	390	0.3 attention to status on claims issues (.3).	\$	117.00
November-20 Claims Administration Objections	on & 11/25/2020	JRW	260	3.5 Work with M. Rachlis and K. Duff on updated claims process (3.5)	\$	910.00
November-20 Claims Administration Objections	on & 11/25/2020	JRW	260	0.6 review court order and transcript regarding court's oral and written interim rulings regarding claims process, draft correspondence to claimants' counsel regarding claims process, and related discussion with K. Duff (.6).	\$	156.00
December-20 Claims Administration Objections	on & 12/1/2020	KBD	390	0.2 Attention to communication with claimant (.2)	\$	78.00
December-20 Claims Administration Objections	on & 12/1/2020	KBD	390	0.2 exchange correspondence regarding communication with claimants' counsel and vendor costs (.2).	\$	78.00
December-20 Claims Administration	on & 12/3/2020	KBD	390	0.4 Work on claims review and planning issues with J. Wine (.4)	\$	156.00
December-20 Claims Administration	on & 12/3/2020	KBD	390	0.2 telephone conference with J. Wine regarding production of investor records (.2)	\$	78.00
December-20 Claims Administration	on & 12/3/2020	KBD	390	0.9 confer with investors' counsel and M. Rachlis regarding claims process and procedural history (.9)	\$	351.00
December-20 Claims Administration Objections	on & 12/3/2020	KBD	390	0.3 attention to claimant communications (.3).	\$	117.00
December-20 Claims Administration Objections	on & 12/4/2020	KBD	390	0.8 Work on claims process for status report and exchange correspondence with J. Wine and M. Rachlis regarding same (.8)	\$	312.00
December-20 Claims Administration Objections	on & 12/4/2020	KBD	390	0.3 study and revise draft responses to claimants (.3)	\$	117.00
December-20 Claims Administration Objections	on & 12/4/2020	KBD	390	0.5 telephone conference with SEC (.5).	\$	195.00
December-20 Claims Administration Objections	on & 12/8/2020	KBD	390	0.2 Exchange correspondence regarding notice of hearing (.2)	\$	78.00
December-20 Claims Administration Objections	on & 12/9/2020	KBD	390	0.1 Exchange correspondence regarding notice and potential claim (.1)	\$	39.00
December-20 Claims Administration Objections	on & 12/9/2020	KBD	390	0.1 exchange correspondence with J. Wine regarding communications with claimant counsel regarding dispute resolution procedures (.1)	\$	39.00
December-20 Claims Administration Objections	on & 12/14/2020	KBD	390	1.8 Work with M. Rachlis and J. Wine regarding claims process, tranches, protective order, claims process outline, and status report (1.8)	\$	702.00
December-20 Claims Administration Objections	on & 12/14/2020	KBD	390	0.3 study proposed tranche grouping and exchange correspondence with M. Rachlis and J. Wine regarding same (.3)	\$	117.00
December-20 Claims Administration Objections	on & 12/15/2020	KBD	390	1.5 Study, revise, and exchange various correspondence relating to multiple drafts of joint status report, claims process, and standard written discovery (1.5)	\$	585.00
December-20 Claims Administration Objections	on & 12/15/2020	KBD	390	0.1 study claimants' counsel's letter to Judge Lee (.1).	\$	39.00
December-20 Claims Administration Objections	on & 12/16/2020	KBD	390	1 study revised joint status report, revised claim procedures, and revised standard written discovery and exchange correspondence with J. Wine regarding same (1.0)	\$	390.00
December-20 Claims Administration Objections	on & 12/16/2020	KBD	390	0.1 exchange correspondence regarding claimant communication (.1).	\$	39.00

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ol	bjection
	Claims Administration &	12/17/2020	KBD	on 390	1.7 Prepare for hearing before Judge Lee (1.7)	\$	663.00
December-20 (Objections Claims Administration & Objections	12/17/2020	KBD	390	0.9 appear before Judge Lee for hearing (.9)	\$	351.00
December-20 (Claims Administration & Objections	12/18/2020	KBD	390	0.5 Work on proposed order regarding claims and EquityBuild documents and study and exchange various correspondence regarding same (.5)	\$	195.00
December-20 (Claims Administration & Objections	12/21/2020	KBD	390	0.2 exchange correspondence with J. Wine regarding proposed order and proposed claims process outline (.2).	\$	78.00
December-20 (Claims Administration & Objections	12/22/2020	KBD	390	0.4 Study and revise proposed order relating to claims and EB documents and exchange correspondence regarding same (.4)	\$	156.00
December-20 (Claims Administration & Objections	12/23/2020	KBD	390	Section of EB documents and claims documentation to claimants (.3)	\$	117.00
December-20 (Claims Administration & Objections	12/24/2020	KBD	390	1.1 Study proposed changes to claims process motion and confer with M. Rachlis and J. Wine regarding same.	\$	429.00
December-20 (Claims Administration & Objections	12/28/2020	KBD	390	2.4 Work on claims review and claims process (2.4)	\$	936.00
	Claims Administration & Objections	12/29/2020	KBD	390	1.7 Work on claims review and claims process (1.7)	\$	663.00
	Claims Administration & Objections	12/29/2020	KBD	390	1.5 study and revise claims process outline for court (1.5).	\$	585.00
	Claims Administration & Objections	12/30/2020	KBD	390	0.5 Study claims process outline and exchange various correspondence regarding same.	\$	195.00
	Business Operations Claims Administration &	12/29/2020 12/1/2020	AW JRW	140 260	0.3 work with IT consultants to resolve issue regarding access to executed contracts stored online (.3)0.3 related correspondence with K. Duff regarding analysis of same (.3)	\$ \$	42.00 78.00
December-20 (Objections Claims Administration &	12/1/2020	JRW	260	1 attention to evaluation of claims process (1.0)	\$	260.00
December-20 (Objections Claims Administration &	12/1/2020	JRW	260	0.5 related email to and telephone conference with potential vendor regarding process, cost and timing of transfer	\$	130.00
December-20 (Objections Claims Administration &	12/2/2020	JRW	260	of claims documentation (.5) 2 Work on joint report regarding claims status (2.0)	\$	520.00
December-20 (Objections Claims Administration &	12/2/2020	MR	390	0.2 attention to exchange on open issues on claims process (.2).	\$	78.00
December-20 (Objections Claims Administration & Objections	12/3/2020	AEP	390	2.9 Legal research regarding claims.	\$	1,131.00
December-20 (Claims Administration & Objections	12/3/2020	JRW	260	2.7 continued modification of proposed tranches (2.3) and related telephone conference with K. Duff (.4)	\$	702.00
December-20 (Claims Administration & Objections	12/4/2020	AW	140	1.2 review claims process outline and share proposed revisions and comments with J. Wine (1.2)	\$	168.00
December-20 (Claims Administration & Objections	12/4/2020	JRW	260	1.6 Complete draft of updated claims process (.9) and related review of prior claims status reports to the court (.7)	\$	416.00
December-20 (Claims Administration & Objections	12/4/2020	JRW	260	0.1 exchange correspondence with vendor regarding estimate (.1)	\$	26.00
December-20 (Claims Administration & Objections	12/4/2020	JRW	260	0.3 draft emails to claimants' counsel regarding claims process (.3).	\$	78.00
December-20 (Claims Administration & Objections	12/4/2020	MR	390	1 Review and comment on claims memo and exchange various emails regarding same with J. Wine and K. Duff (1.0)	\$	390.00
December-20 (Claims Administration & Objections	12/7/2020	AW	140	0.2 Attention to email from claimant, communicate with K. Duff regarding response, and respond to claimant (.2)	\$	28.00
	Claims Administration & Objections	12/7/2020	AW	140	0.1 email exchange with J. Wine regarding fund question (.1)	\$	14.00
	Claims Administration & Objections	12/8/2020	JRW	260	0.1 Exchange correspondence regarding court's order concerning claimants' participation in upcoming hearing (.1)	\$	26.00
	Claims Administration & Objections	12/8/2020	JRW	260	0.3 review and revise notice letter (.3).	\$	78.00
	Claims Administration & Objections	12/9/2020	AEP	390	0.4 Teleconference with K. Duff and J. Wine regarding claims process, potential scenarios, and research and analysis.	\$	156.00

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
December-20 Claims Administration &	12/9/2020	AW	<u>on</u> 140	0.1 communicate with K. Duff and J. Wine regarding claimant's participation in scheduled conference (.1)	\$	14.00
Objections December-20 Claims Administration &	12/9/2020	KMP	140	0.4 Prepare correspondence regarding notice of receivership to creditor and confer with K. Duff and J. Wine	\$	56.00
Objections December-20 Claims Administration &	12/10/2020	AW	140	regarding same. 1.6 Review claims process outline and sample tranche schedule and communicate with J. Wine regarding	\$	224.00
Objections December-20 Claims Administration & Objections	12/10/2020	AW	140	proposed revisions and comments (1.6) 0.1 email exchange with K. Duff regarding response to claimant (.1)	\$	14.00
December-20 Claims Administration & Objections	12/10/2020	AW	140	0.3 attention to master claims list and email exchange with J. Wine regarding same (.3)	\$	42.00
December-20 Claims Administration & Objections	12/10/2020	AW	140	0.2 create a list of claimants represented by counsel and communicate same to counsel (.2).	\$	28.00
December-20 Claims Administration & Objections	12/10/2020	JRW	260	2.2 Study transcript of proceedings and revise standard discovery requests accordingly (2.2)	\$	572.00
December-20 Claims Administration & Objections	12/10/2020	JRW	260	0.1 confer with A. Watychowicz regarding schedule prepared by claimant's counsel (.1)	\$	26.00
December-20 Claims Administration & Objections	12/10/2020	JRW	260	0.2 review appearances on file and prepare list of counsel of record (.2)	\$	52.00
December-20 Claims Administration & Objections	12/10/2020	JRW	260	0.1 correspond with claimants' counsel regarding separation of properties into tranches (.1)	\$	26.00
December-20 Claims Administration & Objections	12/10/2020	MR	390	0.5 Attention to issues on claims process and follow up regarding same.	\$	195.00
December-20 Claims Administration & Objections	12/11/2020	JRW	260	1.6 conference call with K. Duff and M. Rachlis regarding claims process and separation of properties into tranches (1.6)	\$	416.00
December-20 Claims Administration & Objections	12/11/2020	JRW	260	0.1 draft email to claimant regarding upcoming hearing (.1)	\$	26.00
December-20 Claims Administration & Objections	12/11/2020	MR	390	1 Review tranches and claims information for upcoming hearing and meeting (1.0)	\$	390.00
December-20 Claims Administration & Objections	12/11/2020	MR	390	2 conferences regarding various issues with K. Duff and J. Wine regarding claims process (2.0)	\$	780.00
December-20 Claims Administration & Objections	12/11/2020	MR	390	0.5 attention to court opinions and follow up regarding same (.4) attention to communication with claimant regarding upcoming hearing (.1).	\$	195.00
December-20 Claims Administration & Objections	12/14/2020	AW	140	0.2 Attention to emails regarding responses to claimants with suggested revisions and respond to claimants (.2)	\$	28.00
December-20 Claims Administration & Objections	12/14/2020	JRW	260	0.2 exchange correspondence with document vendor regarding revised estimate (.2)	\$	52.00
December-20 Claims Administration & Objections	12/14/2020	JRW	260	0.2 exchange correspondence with K. Duff and M. Rachlis regarding proposed separation of properties into tranches (.2)	\$	52.00
December-20 Claims Administration & Objections	12/14/2020	JRW	260	0.8 review redline and comments from claimant's counsel regarding claims process outline and respond to same (.8)	\$	208.00
December-20 Claims Administration & Objections	12/14/2020	JRW	260	1.8 conference call with K. Duff and M. Rachlis regarding claims process (1.8)	\$	468.00
December-20 Claims Administration & Objections	12/14/2020	JRW	260	1.4 additional revision of claims process outline (1.4)	\$	364.00
December-20 Claims Administration & Objections	12/14/2020	JRW	260	0.2 related correspondence with counsel for claimants (.2).	\$	52.00
December-20 Claims Administration & Objections	12/14/2020	MR	390	2 Review of claims process related issues and communications, and exchanges regarding same with various team members and preparation for upcoming hearing (2.0)	\$	780.00
December-20 Claims Administration & Objections	12/14/2020	MR	390	1.8 participate in conference call with K. Duff and J. Wine (1.8).	\$	702.00
December-20 Claims Administration & Objections	12/15/2020	AW	140	0.2 attention to email from claimant requesting update to claim, review claim, and communicate with K. Duff and J. Wine regarding same (.2)	\$	28.00
December-20 Claims Administration & Objections	12/15/2020	AW	140	0.9 review standard discovery requests and revise it as per counsel's forwarded draft (.9)	\$	126.00
December-20 Claims Administration & Objections	12/15/2020	AW	140	0.1 call with J. Wine regarding pending motions (.1)	\$	14.00
December-20 Claims Administration & Objections	12/15/2020	AW	140	0.5 supplement section of joint claims status report regarding pending motions and email J. Wine regarding same (.5).	\$	70.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 116 of 157 PageID #:65149

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	0	bjection
	Claims Administration & Objections	12/15/2020	JRW	on 260	0.2 Telephone conference with claimants' counsel regarding joint status report to court and related email exchange with K. Duff and M. Rachlis (.2)	\$	52.00
December-20	Claims Administration & Objections	12/15/2020	JRW	260	1.2 draft joint status report on claims (1.2)	\$	312.00
December-20	Claims Administration & Objections	12/15/2020	JRW	260	0.1 review revisions to standard discovery and related email to claimant's counsel (.1)	\$	26.00
December-20	Claims Administration & Objections	12/15/2020	JRW	260	1.1 work with K. Duff and M. Rachlis on revisions to joint status report and outline of procedures (1.1)	\$	286.00
	Claims Administration & Objections	12/15/2020	JRW	260	0.1 telephone conference with claimant's counsel regarding standard discovery requests (.1)	\$	26.00
	Claims Administration & Objections	12/15/2020	JRW	260	0.8 review redline of standard discovery requests and further revise same (.8)	\$	208.00
	Claims Administration & Objections	12/15/2020	JRW	260	0.8 study proposed revisions to joint status report from claimants' counsel and related conference with K. Duff and M. Rachlis (.8)	\$	208.00
	Claims Administration & Objections	12/15/2020	JRW	260	1.6 additional exchanges of drafts and revision of joint status report, outline of procedures, and standard discovery requests (1.6)		416.00
	Claims Administration & Objections	12/15/2020	JRW	260	0.3 exchange correspondence with claimants' counsel and SEC regarding same (.3).	\$	78.00
December-20	Claims Administration & Objections	12/15/2020	MR	390	3.3 Reviews and work on claims related issues and review various drafts regarding same as well as related matters regarding upcoming hearing (3.3)	\$	1,287.00
	Claims Administration & Objections	12/16/2020	AW	140	0.1 finalize email to claimant regarding proposed conference call time and email claimant regarding same (.1)	\$	14.00
December-20	Claims Administration & Objections	12/16/2020	AW	140	0.1 attention to email from claimant and communicate with K. Duff and J. Wine regarding same (.1)	\$	14.00
December-20	Claims Administration & Objections	12/16/2020	AW	140	1.1 add signature blocks to joint status report, revise joint status report, finalize and file with the court. (1.1)	\$	154.00
	Claims Administration & Objections	12/16/2020	AW	140	0.1 forward time stamped joint status report to Judge Lee's courtroom deputy (.1).	\$	14.00
	Claims Administration & Objections	12/16/2020	JRW	260	0.1 Exchange correspondence with claimants' counsel regarding joint claims status report (.1)	\$	26.00
December-20	Claims Administration & Objections	12/16/2020	JRW	260	1.1 study transcripts of proceedings regarding claims process (1.1)	\$	286.00
	Claims Administration & Objections	12/16/2020	JRW	260	0.7 conference call with claimants' counsel regarding claims process and joint status report (.7)	\$	182.00
	Claims Administration & Objections	12/16/2020	JRW	260	1.8 revisions to status report and outline of procedures for distribution of claims documentation and EquityBuild documents (1.8)	\$	468.00
December-20	Claims Administration & Objections	12/16/2020	JRW	260	telephone conferences with institutional lender claimants' counsel (.6) and investor lender claimants' counsel (.3) regarding standard discovery requests and related email exchanges and revision of revised requests (.9)	\$	468.00
	Claims Administration & Objections	12/16/2020	MR	390	2 Further preparation for hearing (2.0)	\$	780.00
December-20	Claims Administration & Objections	12/16/2020	MR	390	1 review and follow up on various issues regarding status report and upcoming hearing and submission (1.0).	\$	390.00
December-20	Claims Administration & Objections	12/17/2020	AW	140	0.1 Communicate with K. Duff and M. Rachlis regarding notice to claimant regarding upcoming hearing (.1)	\$	14.00
December-20	Claims Administration & Objections	12/17/2020	AW	140	0.1 email claimant telephonic hearing access information (.1)	\$	14.00
December-20	Claims Administration & Objections	12/17/2020	AW	140	0.2 draft email to claimant's spouse regarding needed documents (.2)	\$	28.00
December-20	Claims Administration & Objections	12/17/2020	AW	140	0.1 draft email to claimant and communicate with K. Duff and J. Wine regarding same (.1)	\$	14.00
December-20	Claims Administration & Objections	12/17/2020	AW	140	0.1 email accountant regarding claimants' entities (.1).	\$	14.00
	Claims Administration & Objections	12/17/2020	JRW	260	0.1 exchange correspondence with claimant's counsel regarding discovery (.1)	\$	26.00
	Claims Administration & Objections	12/17/2020	JRW	260	0.9 attend court hearing on claims process and outstanding motions (.9)	\$	234.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 117 of 157 PageID #:65150

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	0	bjection
	Claims Administration &	12/17/2020	JRW	on 260	0.2 revise agreed confidentiality order and related correspondence to courtroom deputy (.2)	\$	52.00
December-20 (Objections Claims Administration &	12/17/2020	JRW	260	0.2 exchange correspondence with K. Duff regarding supplementation of claims documentation (.2).	\$	52.00
December-20 (Objections Claims Administration &	12/17/2020	MR	390	3 Continue preparation for upcoming hearing (3.0)	\$	1,170.00
December-20 (Objections Claims Administration &	12/17/2020	MR	390	0.9 attend hearing before Judge Lee (.9)	\$	351.00
December-20 (Objections Claims Administration &	12/17/2020	MR	390	0.3 follow up on proposed order (.3).	\$	117.00
December-20 (Objections Claims Administration &	12/18/2020	JRW	260	1.8 Draft proposed order on claims process (1.8)	\$	468.00
December-20 (Objections Claims Administration &	12/18/2020	JRW	260	0.8 revise same to incorporate comments from K. Duff and M. Rachlis (.7) and related email to claimants' counsel	\$	208.00
December-20 (Objections Claims Administration &	12/18/2020	MR	390	and SEC (.1) 0.7 Attention to order on claims and follow up and exchanges regarding same with J. Wine and K. Duff.	\$	273.00
December-20 (Objections Claims Administration &	12/21/2020	AW	140	0.1 attention to entered confidentiality order and email counsel regarding same (.1)	\$	14.00
December-20 (Objections Claims Administration &	12/21/2020	AW	140	0.2 attention to deadlines set by Judge Lee and update docket (.2).	\$	28.00
December-20 (Objections Claims Administration &	12/21/2020	JRW	260	0.4 exchange correspondence with claimant's counsel regarding proposed claims process and order and related	\$	104.00
December-20 (Objections Claims Administration &	12/22/2020	JRW	260	review of redlines (.4). 0.1 Email exchange regarding EquityBuild documents (.1)	\$	26.00
December-20 (Objections Claims Administration &	12/22/2020	JRW	260	1.8 review redlines of proposed order from claimants' counsel, K. Duff and M. Rachlis and further revise same to	\$	468.00
December-20 (Objections Claims Administration &	12/22/2020	JRW	260	incorporate comments (1.8) 0.2 exchange correspondence with claimant's counsel and M. Rachlis regarding EquityBuild documents (.2).	\$	52.00
December-20 (Objections Claims Administration &	12/22/2020	MR	390	2.1 Further review and revise of draft order on claims and follow up on same and other issues on claims process,	\$	819.00
December-20 (Objections Claims Administration &	12/23/2020	JRW	260	and work with K. Duff and J. Wine regarding addressing such issues. 0.5 Review and reconcile redlines of proposed order and claims process received from claimants' counsel (.5)	\$	130.00
December-20 (Objections Claims Administration &	12/23/2020	JRW	260	0.8 conference call with claimants' counsel regarding proposed order and claims process (.8)	\$	208.00
December-20 (Objections Claims Administration &	12/23/2020	JRW	260	0.9 further revision to proposed order and related exchange of correspondence with K. Duff (.9)	\$	234.00
December-20 (Objections Claims Administration &	12/23/2020	JRW	260	0.2 telephone conference with document vendor regarding proposal for documents produced in response to	\$	52.00
December-20 (Objections Claims Administration & Objections	12/23/2020	MR	390	standard discovery requests (.2) 0.5 Attention to issues on proposed order and other issues on claims.	\$	195.00
December-20 (Claims Administration &	12/24/2020	JRW	260	0.3 Further revise proposed order based on additional revisions from claimants' counsel (.3)	\$	78.00
December-20 (Objections Claims Administration &	12/24/2020	JRW	260	1.5 conference call with claimants' regarding proposed claims process (1.5)	\$	390.00
December-20 (Objections Claims Administration &	12/24/2020	JRW	260	0.4 review claimants' counsel's revisions to claims process outline (.4)	\$	104.00
December-20 (Objections Claims Administration & Objections	12/24/2020	JRW	260	1.6 conference with K. Duff and M. Rachlis regarding same (.9) and further revision and annotation of outline (.7).	\$	416.00
December-20 (Claims Administration &	12/24/2020	MR	390	0.9 Review orders and attention to claims process issues and participate in meeting with K. Duff and J. Wine.	\$	351.00
December-20 (Objections Claims Administration &	12/28/2020	AEP	390	2 Conference call with team to discuss legal and factual overview of priority claims and articulate strategy for reviewing and assessing competing claims associated with properties (2.0)	\$	780.00
December-20 (Objections Claims Administration &	12/28/2020	JRW	260	0.2 revise standard discovery to institutional lenders and related review of October 27 hearing transcript (.2)	\$	52.00
December-20 (Objections Claims Administration &	12/28/2020	MR	390	0.9 Begin review of claims relating to first tranche properties (.9)	\$	351.00
December-20 (Objections Claims Administration & Objections	12/28/2020	MR	390	2.2 work with team on issues relating to same (2.2).	\$	858.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 118 of 157 PageID #:65151

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
December-20	Claims Administration &	12/29/2020	JRW	on 260	0.1 Telephone conference with A. Watychowicz regarding mortgagee listings and claims analysis (.1)	\$	26.00
December-20	Objections Claims Administration &	12/29/2020	JRW	260	1.7 confer with K. Duff, A. Porter, M. Rachlis and A. Watychowicz regarding procedures for analyzing claims (1.7).	\$	442.00
December-20	Objections Claims Administration &	12/29/2020	MR	390	1.7 participate in meeting with K. Duff, J. Wine and A. Watychowicz regarding claims review (1.7)	\$	663.00
December-20	Objections Claims Administration & Objections	12/29/2020	MR	390	1.2 work on claims process outline issues (1.2).	\$	468.00
December-20	Claims Administration &	12/30/2020	JRW	260	0.5 Review redlines and comments regarding proposed claims process outline (.5)	\$	130.00
December-20	Objections Claims Administration & Objections	12/30/2020	JRW	260	1.8 conference call with claimants' counsel regarding same (1.8)	\$	468.00
December-20	Claims Administration & Objections	12/30/2020	JRW	260	0.5 prepare summary and exchange correspondence with K. Duff and M. Rachlis regarding same (.5)	\$	130.00
December-20	Claims Administration & Objections	12/30/2020	JRW	260	0.3 telephone conference with A. Watychowicz regarding process for claims verification and review (.3)	\$	78.00
December-20	Claims Administration &	12/30/2020	MR	390	1 Attention to claims process issues and follow up emails on same to K. Duff and J. Wine.	\$	390.00
December-20	Objections Claims Administration &	12/31/2020	JRW	260	2.2 Prepare revised claims process outline with comments for further discussion.	\$	572.00
January-21	Objections Claims Administration &	1/4/2021	KBD	390	0.6 Study claims outline and related correspondence and revisions from J. Wine and M. Rachlis (.6)	\$	234.00
January-21	Objections Claims Administration &	1/5/2021	KBD	390	1.8 study and revise claims process outline and exchange correspondence with M. Rachlis and J. Wine relating to	\$	702.00
January-21	Objections Claims Administration &	1/6/2021	KBD	390	same (1.8). 1.5 Work on claims review and claims process (1.5)	\$	585.00
January-21	Objections Claims Administration & Objections	1/6/2021	KBD	390	0.5 draft and revise outline of issues for claims review process and draft related correspondence to A. Porter (.5)	\$	195.00
January-21	Claims Administration & Objections	1/6/2021	KBD	390	1.1 study and revise draft communication to claimants regarding confidentiality order and claims process order (1.1)	\$	429.00
January-21	Claims Administration & Objections	1/6/2021	KBD	390	0.2 study correspondence from claimant regarding claims documentation and exchange correspondence with A. Watychowicz relating to same (.2)	\$	78.00
January-21	Claims Administration & Objections	1/6/2021	KBD	390	0.1 attention to request from claimant for information relating to property sales (.1).	\$	39.00
January-21	Claims Administration & Objections	1/7/2021	KBD	390	Study and revise communication to claimants regarding confidentiality order and claims process and review various correspondence relating to same (.6)	\$	234.00
January-21	Claims Administration &	1/7/2021	KBD	390	1.9 confer with M. Rachlis and J. Wine regarding claims process (1.9).	\$	741.00
January-21	Objections Claims Administration &	1/11/2021	KBD	390	0.3 Confer with A. Porter regarding claims analysis and investigation issues (.3)	\$	117.00
January-21	Objections Claims Administration &	1/11/2021	KBD	390	0.5 gather information at claimant's counsel's request and draft correspondence regarding same (.5)	\$	195.00
January-21	Objections Claims Administration &	1/12/2021	KBD	390	0.3 Study analysis of claims and exchange correspondence with J. Wine regarding same (.3)	\$	117.00
January-21	Objections Claims Administration &	1/13/2021	KBD	390	0.3 Review and revise claims vendor statement of work and exchange correspondence with J. Wine regarding	\$	117.00
January-21	Objections Claims Administration &	1/15/2021	KBD	390	same (.3) 1.7 Work on claims process (1.7)	\$	663.00
January-21	Objections Claims Administration &	1/15/2021	KBD	390	1 confer with M. Rachlis and J. Wine regarding claims process (1.0)	\$	390.00
January-21	Objections Claims Administration &	1/17/2021	KBD	390	2 Work on claims process (2.0)	\$	780.00
January-21	Objections Claims Administration &	1/17/2021	KBD	390	0.1 exchange correspondence with A. Watychowicz regarding response to claimant relating to claim (.1).	\$	39.00
January-21	Objections Claims Administration &	1/18/2021	KBD	390	0.1 exchange correspondence with A. Watychowicz regarding statement of work for vendor claims project (.1)	\$	39.00
January-21	Objections Claims Administration & Objections	1/19/2021	KBD	390	0.3 work on standard written discovery for claimants (.3)	\$	117.00

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Ol	bjection
	Keeper	Rate	Hours	Descripti on	Cost		
January-21	Claims Administration & Objections	1/19/2021	KBD	390	0.3 study revisions to claims resolution process (.3).	\$	117.00
January-21	Claims Administration & Objections	1/20/2021	KBD	390	3.1 Work with M. Rachlis and J. Wine on claims process outline and standard written discovery requests (3.1)	\$	1,209.00
January-21	Claims Administration &	1/20/2021	KBD	390	1.1 study multiple revisions to same and further telephone conferences and exchange correspondence with J.	\$	429.00
January-21	Objections Claims Administration &	1/21/2021	KBD	390	Wine and M. Rachlis regarding claims process outline and standard written discovery requests (1.1) 2.7 Work on claims process outline and standard discovery (2.7)	\$	1,053.00
January-21	Objections Claims Administration &	1/22/2021	KBD	390	0.3 Telephone conference with claimant's counsel regarding claims process (.3)	\$	117.00
January-21	Objections Claims Administration &	1/22/2021	KBD	390	2.4 work on joint status report and numerous communications with J. Wine and M. Rachlis regarding same (2.4)	\$	936.00
January-21	Objections Claims Administration &	1/26/2021	KBD	390	0.1 exchange correspondence with A. Watychowicz regarding information relating to claimants (.1).	\$	39.00
January-21	Objections Claims Administration &	1/27/2021	KBD	390	0.1 exchange correspondence with J. Wine regarding confidentiality order (.1).	\$	39.00
January-21	Objections Claims Administration &	1/28/2021	KBD	390	0.2 Draft correspondence to counsel for claimants regarding request for documents (.2)	\$	78.00
January-21	Objections Claims Administration &	1/28/2021	KBD	390	0.1 attention to revision to claims process order (.1)	\$	39.00
January-21	Objections Claims Administration &	1/28/2021	KBD	390	0.1 study correspondence from J. Porter regarding reconciliation of records (.1).	\$	39.00
January-21	Objections Claims Administration &	1/29/2021	KBD	390	1 Confer with M. Rachlis and J. Wine regarding claims process and preparation for hearing before Judge Lee	\$	390.00
January-21	Objections Claims Administration &	1/29/2021	KBD	390	(1.0) 0.3 confer with SEC (.3)	\$	117.00
January-21	Objections Claims Administration &	1/29/2021	KBD	390	1.4 appear for hearing before Judge Lee regarding claims process (1.4)	\$	546.00
January-21	Objections Claims Administration &	1/29/2021	KBD	390	0.1 review correspondence from claimant's counsel regarding claim amount (.1)	\$	39.00
January-21	Objections Claims Administration &	1/29/2021	KBD	390	0.1 exchange correspondence regarding communication with claimant about hearing before Judge Lee (.1).	\$	39.00
January-21	Objections Claims Administration &	1/4/2021	JR	140	2.3 Confer with A. Porter regarding the claims process (2.3)	\$	322.00
January-21	Objections Claims Administration &	1/4/2021	JRW	260	0.4 review suggested revisions to claims process outline and related correspondence with M. Rachlis and K. Duff	\$	104.00
January-21	Objections Claims Administration &	1/4/2021	MR	390	regarding same (.4) 1.6 Attention to status on claims and work on claims outline.	\$	624.00
January-21	Objections Claims Administration &	1/5/2021	AW	140	0.1 Communicate with K. Pritchard regarding service of documents on claimants (.1)	\$	14.00
January-21	Objections Claims Administration &	1/5/2021	AW	140	0.2 draft email to claimants regarding discovery and claims process (.2)	\$	28.00
January-21	Objections Claims Administration &	1/5/2021	JRW	260	0.2 Exchange correspondence with document vendor regarding claims document transfer (.2)	\$	52.00
January-21	Objections Claims Administration &	1/5/2021	JRW	260	0.3 confer with A. Watychowicz regarding proposed order and feasibility of email distribution lists for tranches (.3)	\$	78.00
January-21	Objections Claims Administration &	1/5/2021	JRW	260	2.1 study revisions and comments on claims process outline, additional revisions in response to comments and	\$	546.00
January-21	Objections Claims Administration &	1/5/2021	JRW	260	circulate same to claimants' counsel and SEC (2.1) 0.2 email exchange with claimants' counsel regarding request for records (.2).	\$	52.00
January-21	Objections Claims Administration &	1/5/2021	MR	390	1 Review and follow up on claims outline and exchanges with J. Wine and K. Duff (1.0)	\$	390.00
January-21	Objections Claims Administration &	1/6/2021	AEP	390	1.5 Teleconference with team to discuss claims processing, legal issues associated therewith, and approach to	\$	585.00
January-21	Objections Claims Administration &	1/6/2021	AW	140	analysis. 0.4 attention to emails from claimant forwarding documents, review claim and documents communicate with J.	\$	56.00
January-21	Objections Claims Administration & Objections	1/6/2021	AW	140	Wine regarding same, and email response to claimant (.4) 0.4 work with J. Wine on draft email to claimants regarding access to claims and discovery process (.4).	\$	56.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 120 of 157 PageID #:65153

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
	Keeper	Rate	Hours	Descripti on	Cost		
January-21	Claims Administration & Objections	1/6/2021	JP	95	1 Teleconference with team to discuss claims processing, legal issues associated therewith, and approach to analysis.	\$	95.00
January-21	Claims Administration & Objections	1/6/2021	JRW	260	1.4 Conference call with claimants' counsel and SEC regarding claims process (1.4)	\$	364.00
January-21	Claims Administration & Objections	1/6/2021	JRW	260	0.2 exchange correspondence with claims vendor regarding document transfer (.2)	\$	52.00
January-21	Claims Administration & Objections	1/6/2021	JRW	260	1.5 videoconference with A. Porter, J. Porter, K. Duff, and A. Watychowicz regarding claims analysis (1.5)	\$	390.00
January-21	Claims Administration & Objections	1/6/2021	JRW	260	0.5 draft proposed email to claimants forwarding confidentiality and document orders (.5)	\$	130.00
January-21	Claims Administration & Objections	1/6/2021	JRW	260	0.1 email exchange with claims vendor regarding status of project (.1).	\$	26.00
January-21	Claims Administration & Objections	1/6/2021	MR	390	1.5 Attention to meeting on claims related issues.	\$	585.00
January-21	Claims Administration & Objections	1/7/2021	AW	140	0.1 Attention to email from claimant regarding claim and direct him to updated status report (.1)	\$	14.00
January-21	Claims Administration & Objections	1/7/2021	AW	140	0.1 follow up regarding email to claimants regarding access to claims and discovery process (.1)	\$	14.00
January-21	Claims Administration &	1/7/2021	JRW	260	0.6 Review redlines of draft email to claimants forwarding confidentiality and document orders and further revise	\$	156.00
January-21	Objections Claims Administration &	1/7/2021	JRW	260	to incorporate comments regarding same (.6) 0.1 email exchange with SEC (.1)	\$	26.00
January-21	Objections Claims Administration &	1/7/2021	JRW	260		\$	52.00
January-21	Objections Claims Administration &	1/7/2021	JRW	260	M. Rachlis regarding same (.1) O.1 exchange correspondence with A. Watychowicz regarding compilation of email service lists by claims vendor	\$	26.00
January-21	Objections Claims Administration &	1/7/2021	JRW	260	(.1) 1.6 revise claims process outline to set forth disputed issues (1.6)	\$	416.00
January-21	Objections Claims Administration &	1/7/2021	JRW	260	1.8 video-conference with K. Duff and M. Rachlis regarding claims process (1.8)	\$	468.00
January-21	Objections Claims Administration &	1/7/2021	JRW	260	0.2 confer with J. Rak regarding claims analysis (.2)	\$	52.00
January-21	Objections Claims Administration &	1/7/2021	JRW	260	0.2 further revision to claims process outline and related correspondence to SEC (.2).	\$	52.00
January-21	Objections Claims Administration &	1/7/2021	MR	390	1.9 Follow up conference on claims process and issues (1.9)	\$	741.00
January-21	Objections Claims Administration &	1/8/2021	AW	140	0.2 Work with IT consultant on continued issue with access to executed contracts stored online (.2)	\$	28.00
January-21	Objections Claims Administration &	1/8/2021	AW	140	2.3 video call regarding review of claims (2.3)	\$	322.00
January-21	Objections Claims Administration &	1/8/2021	JP	95	2 Conference call with team to further analyze various types of claims submitted by investor lenders and to	\$	190.00
January-21	Objections Claims Administration &	1/8/2021	JR	140	create a written procedure to guide resolution of all claims. 0.8 telephone call with J. Wine regarding claims process (.8)	\$	112.00
January-21	Objections Claims Administration &	1/8/2021	JRW	260	0.1 Confer with A. Watychowicz regarding claims review (.1)	\$	26.00
January-21	Objections Claims Administration &	1/8/2021	JRW	260	0.8 work with J. Rak on review procedures (.8)	\$	208.00
January-21	Objections Claims Administration &	1/8/2021	JRW	260	0.1 confer with claims vendor regarding access credentials (.1)	\$	26.00
January-21	Objections Claims Administration &	1/8/2021	JRW	260	0.4 conference with K. Duff regarding claims process (.4).	\$	104.00
January-21	Objections Claims Administration &	1/8/2021	MR	390	2 Participate in meeting on claims with receivership team.	\$	780.00
January-21	Objections Claims Administration &	1/9/2021	AEP	390	2.3 Teleconference with team to analyze various types of claims submitted by investor lenders and to create	\$	897.00
January-21	Objections Claims Administration & Objections	1/9/2021	MR	390	written procedures to guide resolution of same. 3 Attention to claims and related issues and communicate with K. Duff and A. Porter and receivership team.	\$	1,170.00

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Ob	jection
	Keeper	Rate	Hours	Descripti on	Cost		
January-21	Claims Administration & Objections	1/11/2021	AEP	390	0.3 Teleconference with K. Duff regarding claims issue.	\$	117.00
January-21	Claims Administration & Objections	1/11/2021	JRW	260	0.2 revisions to claims process outline (.2)	\$	52.00
January-21	Claims Administration & Objections	1/11/2021	MR	390	0.4 Conference with K. Duff regarding claims process and resolution of issues of claims.	\$	156.00
January-21	Claims Administration & Objections	1/12/2021	JRW	260	0.2 telephone conference and follow up emails to claims vendors regarding transfer of documents (.2)	\$	52.00
January-21	Claims Administration & Objections	1/13/2021	JRW	260	0.3 exchange correspondence with K. Duff regarding vendor statement of work and related review of revisions to same (.3)	\$	78.00
January-21	Claims Administration & Objections	1/13/2021	JRW	260	0.5 exchange correspondence with A. Porter regarding claims review and related review of claims data (.5)	\$	130.00
January-21	Claims Administration &	1/14/2021	JRW	260	0.2 Exchange correspondence with K. Duff regarding claim submitted by claimant (.2)	\$	52.00
January-21	Objections Claims Administration &	1/14/2021	JRW	260	0.1 work with J. Rak on claims review chart (.1)	\$	26.00
January-21	Objections Claims Administration &	1/14/2021	JRW	260	0.8 telephone conference with claimant and K. Duff regarding status of matter and claims process (.8)	\$	208.00
January-21	Objections Claims Administration &	1/14/2021	JRW	260	0.1 exchange correspondence with claims vendor regarding estimate (.1)	\$	26.00
January-21	Objections Claims Administration &	1/15/2021	JRW	260	1.4 Study correspondence and license agreement from EquityBuild vendor and related preparation of chronology	\$	364.00
January-21	Objections Claims Administration &	1/15/2021	JRW	260	and email exchange with K. Duff (1.4) 0.5 confer with M. Rachlis regarding statement of work from documents vendor and revise same (.5)	\$	130.00
January-21	Objections Claims Administration &	1/15/2021	MR	390	0.4 Review recent version of claims process (.4)	\$	156.00
January-21	Objections Claims Administration &	1/15/2021	MR	390	1 participate in call regarding claims process with K. Duff and J. Wine (1.0)	\$	390.00
January-21	Objections Claims Administration &	1/15/2021	MR	390	2.5 research regarding claims process (2.5).	\$	975.00
January-21	Objections Claims Administration &	1/18/2021	AW	140	0.1 Correspond with K. Duff and J. Wine regarding forms forwarded by claimant (.1)	\$	14.00
January-21	Objections Claims Administration &	1/18/2021	AW	140	0.4 review claim and supporting documents and communicate with J. Wine regarding proposed revisions to	\$	56.00
January-21	Objections Claims Administration &	1/18/2021	AW	140	master claims list (.4) 0.2 respond to claimants' emails (.2)	\$	28.00
January-21	Objections Claims Administration &	1/18/2021	AW	140	0.1 work with IT consultant to regain access to executed contracts (.1)	\$	14.00
January-21	Objections Claims Administration &	1/18/2021	JRW	260	0.1 confer with A. Watychowicz regarding statement of work from document vendor (.1)	\$	26.00
January-21	Objections Claims Administration &	1/18/2021	JRW	260	0.4 confer with A. Watychowicz regarding EquityBuild documents and related correspondence to counsel for	\$	104.00
January-21	Objections Claims Administration &	1/18/2021	JRW	260	claimants (.4) 0.3 confer with K. Duff regarding statement of work from document vendor and related exchange of	\$	78.00
January-21	Objections Claims Administration &	1/19/2021	AW	140	correspondence with vendor (.3) 0.1 Respond to emails from claimants (.1)	\$	14.00
January-21	Objections Claims Administration &	1/19/2021	AW	140	0.1 communicate with K. Duff and J. Wine regarding timing of claims process (.1)	\$	14.00
January-21	Objections Claims Administration &	1/19/2021	AW	140	0.3 start research regarding email group options and communicate with IT consultant regarding same (.3).	\$	42.00
	Objections Claims Administration &	1/19/2021	JP	95	0.9 gather deed document numbers, amounts, and dates in order to add to the master organizational EB portfolio	\$	85.50
•	Objections Claims Administration &	1/19/2021	JRW	260	(.9). 0.3 review revised vendor statement of work and related correspondence (.3)	\$	78.00
•	Objections Claims Administration &	1/19/2021	JRW	260	0.2 correspondence with A. Porter regarding claims analysis (.2)	\$	52.00
•	Objections Claims Administration &	1/19/2021	JRW	260	0.2 exchange correspondence with claimants' counsel regarding EquityBuild documents (.2)	\$	52.00
January-21	Objections	1, 10/2021	0.111	200	one one and open across that definiting country regarding Equity build account to (12)	Ψ	02.00

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	0	bjection
	Keeper	Rate	Hours	Descripti on	Cost		
January-21	Claims Administration & Objections	1/19/2021	JRW	260	0.1 correspondence with K. Duff regarding vendor statement of work (.1)	\$	26.00
January-21	Claims Administration & Objections	1/19/2021	JRW	260	0.2 review E. Duff analysis of institutional lender debt (.2)	\$	52.00
January-21	Claims Administration &	1/19/2021	JRW	260	1.9 review revisions to claims process outline from claimants' counsel (1.9)	\$	494.00
January-21	Objections Claims Administration &	1/19/2021	JRW	260		\$	78.00
January-21	Objections Claims Administration &	1/19/2021	MR	390	of same (.3). 1.5 Work to review and comment on issues on claims process (1.5)	\$	585.00
January-21	Objections Claims Administration &	1/19/2021	MR	390	0.4 attention to communications from institutional investor regarding claims issues (.4).	\$	156.00
•	Objections Claims Administration &	1/20/2021	AW	140	0.3 email exchanges with claims vendor and K. Duff regarding proposed project, revisions to statement of work,	\$	42.00
•	Objections				and approval of same (.3).	·	
January-21	Claims Administration & Objections	1/20/2021	JRW	260	3.1 Extensive conference with K. Duff and M. Rachlis regarding claims process and related meet and confers with claimants' counsel and discovery issues (3.1)	\$	806.00
January-21	Claims Administration & Objections	1/20/2021	JRW	260	0.4 revise institutional lender claimants' proposed standard discovery request and related exchange of correspondence with claimants' counsel (.4)	\$	104.00
January-21	Claims Administration & Objections	1/20/2021	JRW	260		\$	130.00
January-21	Claims Administration &	1/20/2021	JRW	260	2.9 work with K. Duff and M. Rachlis on revising draft joint status report regarding claims process (2.9)	\$	754.00
January-21	Objections Claims Administration &	1/20/2021	JRW	260	0.1 review redline of claims process from claimants' counsel (.1)	\$	26.00
January-21	Objections Claims Administration &	1/20/2021	JRW	260	0.2 correspondence circulating draft process to claimants' counsel (.2)	\$	52.00
January-21	Objections Claims Administration &	1/20/2021	JRW	260	0.7 conference with S. Zjalic regarding process for reviewing claims (.7)	\$	182.00
	Objections Claims Administration &	1/20/2021	JRW	260	0.4 correspondence and telephone conference with SEC (.4).	\$	104.00
•	Objections					•	
	Claims Administration & Objections	1/20/2021	MR	390	2.9 Further work and review issues on edits to claims process and issues regarding same (2.9)	\$	1,131.00
January-21	Claims Administration & Objections	1/20/2021	MR	390	3.3 participate in lengthy call regarding process with K. Duff and J. Wine (3.3)	\$	1,287.00
January-21	Claims Administration & Objections	1/20/2021	MR	390	0.4 conference call regarding claims related discovery (.4).	\$	156.00
January-21	Claims Administration &	1/20/2021	SZ	110	0.7 Work with J. Wine regarding review of Chicago Capital Fund I claims.	\$	77.00
January-21	Objections Claims Administration &	1/21/2021	AEP	390	0.5 Research EquityBuild files to assemble various publicly recorded documents, settlement statements, and	\$	195.00
January-21	Objections Claims Administration &	1/21/2021	AW	140	other materials relevant to claims process. 0.2 Finalize responses to claimants and email same (.2)	\$	28.00
January-21	Objections Claims Administration &	1/21/2021	AW	140	0.5 continue research and tests on email groups (.5)	\$	70.00
January-21	Objections Claims Administration &	1/21/2021	AW	140	0.6 conference call with J. Wine regarding email groups (.6)	\$	84.00
•	Objections Claims Administration &	1/21/2021	AW	140		\$	56.00
,	Objections				0.4 attention to email lists received from claims vendor, review same, and communicate with J. Wine regarding related issues (.4).		
•	Claims Administration & Objections	1/21/2021	JRW	260	0.5 Videoconference with A. Watychowicz regarding strategy for serving claimants via email distribution groups (.5)	\$	130.00
January-21	Claims Administration & Objections	1/21/2021	JRW	260	0.1 correspondence with claimants' counsel and A. Watychowicz regarding revisions to standard discovery requests (.1)	\$	26.00
January-21	Claims Administration & Objections	1/21/2021	JRW	260	1.3 study claimants' proposed revisions to joint report to court regarding claims process (1.3)	\$	338.00
January-21	Claims Administration &	1/21/2021	JRW	260	0.1 confer with A. Watychowicz regarding claimant email list from vendor (.1)	\$	26.00
January-21	Objections Claims Administration & Objections	1/21/2021	JRW	260	0.9 conference call with claimants' counsel and SEC regarding claims process and joint report (.9)	\$	234.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 123 of 157 PageID #:65156

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	0	bjection
January-21	Claims Administration & Objections	1/21/2021	JRW	on 260	3.4 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).	\$	884.00
January-21	Claims Administration & Objections	1/21/2021	MR	390	3.6 Further attention to claims issues for submission with numerous exchanges with K. Duff and J. Wine.	\$	1,404.00
January-21	Claims Administration & Objections	1/22/2021	AW	140	0.3 Revisions to exhibits to joint status report and email J. Wine about same (.3)	\$	42.00
January-21	Claims Administration & Objections	1/22/2021	AW	140	0.2 review joint report and address issue of pending motions (.2)	\$	28.00
January-21	Claims Administration & Objections	1/22/2021	AW	140	1.9 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)	\$	266.00
January-21	Claims Administration & Objections	1/22/2021	AW	140	0.9 review and work on possible access to EquityBuild documents (.9)	\$	126.00
January-21	Claims Administration & Objections	1/22/2021	AW	140	0.3 research pst files and Receiver's emails regarding communications and claims of former EquityBuild employee (.3)	\$	42.00
January-21	Claims Administration & Objections	1/22/2021	AW	140	0.5 review of documents production and detailed email to counsel regarding same (.5).	\$	70.00
January-21	Claims Administration & Objections	1/22/2021	JRW	260	0.1 Research and correspond with K. Duff regarding claimants (.1)	\$	26.00
•	Claims Administration & Objections	1/22/2021	JRW	260	0.4 revisions to standard discovery requests for inclusion in joint status report and related correspondence with claimants' counsel (.4)	\$	104.00
January-21	Claims Administration & Objections	1/22/2021	JRW	260	6.6 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).	\$	1,716.00
January-21	Claims Administration & Objections	1/22/2021	MR	390	3.5 Work on various drafts of joint status reports and discovery requests and confer on various issues with J. Wine and K. Duff.	\$	1,365.00
January-21	Claims Administration & Objections	1/25/2021	AW	140	0.1 Attention to email from Judge Lee's courtroom deputy regarding claims order and call with J. Wine regarding same (.1)	\$	14.00
January-21	Claims Administration & Objections	1/25/2021	AW	140	0.2 revise proposed email to claimants and email counsel regarding same (.2).	\$	28.00
January-21	Claims Administration & Objections	1/25/2021	JRW	260	0.2 related communications with S. Zjalic and J. Rak (.2)	\$	52.00
January-21	Claims Administration & Objections	1/25/2021	JRW	260	0.1 exchange correspondence with court clerk regarding claims process (.1)	\$	26.00
January-21	Claims Administration & Objections	1/25/2021	JRW	260	0.1 related review of draft email to claimants (.1)	\$	26.00
January-21	Claims Administration & Objections	1/25/2021	JRW	260	0.2 exchange correspondence with K. Duff and K. Pritchard regarding claim (.2)	\$	52.00
January-21	Claims Administration & Objections	1/25/2021	JRW	260	0.2 research and correspond with K. Duff regarding confidentiality issue (.2).	\$	52.00
January-21	Claims Administration & Objections	1/25/2021	MR	390	0.4 Attention to various claims related items on upcoming hearing.	\$	156.00
January-21	Claims Administration & Objections	1/26/2021	AW	140	0.4 Attention to email from K. Duff regarding potential claimants, review submitted claims, and make appropriate notes in master claims list (.4)	\$	56.00
January-21	Claims Administration & Objections	1/26/2021	AW	140	0.1 communicate with K. Duff regarding claims vendor file (.1)	\$	14.00
January-21	Claims Administration & Objections	1/26/2021	AW	140	0.4 attention to emails from claimants, review their claims, draft responses (.4)	\$	56.00
January-21	Claims Administration & Objections	1/26/2021	AW	140	0.3 review files preserved by IT consultant, upload same to shared file, and communicate with J. Wine regarding same (.3)	\$	42.00
January-21	Claims Administration & Objections	1/26/2021	AW	140	0.2 communicate with IT consultant regarding new email project (.2).	\$	28.00
January-21	Claims Administration & Objections	1/26/2021	JRW	260	0.4 review EB documents (.4)	\$	104.00
January-21	Claims Administration & Objections	1/26/2021	JRW	260	0.4 factual research regarding claimants (.4)	\$	104.00

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	ojection
January-21	Claims Administration &	1/26/2021	JRW	on 260	0.1 exchange correspondence relating to claimants' counsel request for records (.1)	\$	26.00
January-21	Objections Claims Administration &	1/27/2021	AW	140	0.1 Call with J. Wine regarding claimants' email contact sheets (.1)	\$	14.00
January-21	Objections Claims Administration &	1/27/2021	AW	140	0.4 attention to claims containing wrong supporting documents and reach out to claims vendor regarding the issue	\$	56.00
January-21	Objections I Claims Administration & Objections	1/27/2021	AW	140	(.4)0.1 communicate with accountant regarding claimants' entities issues (.1)	\$	14.00
January-21	Claims Administration & Objections	1/27/2021	AW	140	0.1 follow up with IT consultant regarding email project and additional keywords searched requested by J. Wine	\$	14.00
January-21	Claims Administration &	1/27/2021	AW	140	(.1)0.1 communicate with K. Duff regarding records received from claims vendor and processing of same (.1).	\$	14.00
January-21	Objections Claims Administration &	1/27/2021	JRW	260	0.3 Correspondence with K. Duff regarding analysis of emails relating to claimant (.3)	\$	78.00
January-21	Objections Claims Administration &	1/27/2021	JRW	260	1.1 videoconference with A. Watychowicz regarding EB document vendors (.5) and continued review of EB	\$	286.00
January-21	Objections Claims Administration &	1/27/2021	JRW	260	records (.6) 0.2 correspondence from court clerk regarding proposed order and related exchange with K. Duff and M. Rachlis	\$	52.00
January-21	Objections Claims Administration &	1/27/2021	JRW	260	(.2) 0.2 exchange correspondence with claimants' counsel regarding procedures and timing for sharing claims and	\$	52.00
January-21	Objections Claims Administration &	1/27/2021	MR	390	EquityBuild documents (.2) 0.4 Attention to various claims issues regarding upcoming hearing.	\$	156.00
January-21	Objections Claims Administration &	1/28/2021	AW	140	0.1 Communicate with K. Duff and J. Wine regarding email from claimant (.1)	\$	14.00
January-21	Objections Claims Administration &	1/28/2021	AW	140	4.1 review and email communications with J. Wine regarding proposed updates to master claims list and detailed	\$	574.00
January-21	Objections Claims Administration &	1/28/2021	JP	95	, ,	\$	361.00
January-21	Objections Claims Administration &	1/28/2021	JRW	260	(3.8).0.2 Draft response to court clerk regarding proposed order and revisions thereto (.2)	\$	52.00
January-21	Objections Claims Administration &	1/28/2021	JRW	260	0.3 confer with A. Watychowicz and related correspondence to claimant's counsel regarding EB documents (.3)	\$	78.00
January-21	Objections I Claims Administration & Objections	1/28/2021	JRW	260	0.1 exchange correspondence with claims vendor regarding claims documentation (.1)	\$	26.00
January-21	Claims Administration & Objections	1/28/2021	JRW	260	0.9 work with S. Zjalic and J. Porter on claims review and related emails exchange with A. Watychowicz (.9)	\$	234.00
January-21	Claims Administration & Objections	1/28/2021	JRW	260	0.2 attention to claimants' inquires (.2)	\$	52.00
January-21	Claims Administration & Objections	1/28/2021	MR	390	0.8 Conference with K. Duff regarding upcoming hearing and claims issues (.8)	\$	312.00
January-21	Claims Administration & Objections	1/28/2021	MR	390	2.8 further preparation for hearing and review of prior briefs and transcripts (2.8)	\$	1,092.00
January-21	Claims Administration & Objections	1/28/2021	MR	390	0.1 attention to communication regarding claims documentation (.1).	\$	39.00
January-21	Claims Administration & Objections	1/29/2021	AW	140	 Continued review and email communications with J. Wine regarding proposed updates to master claims list and detailed summary (2.6) 	\$	364.00
January-21	Claims Administration & Objections	1/29/2021	AW	140	0.2 attention to email from counsel, update claimed amounts, and communicate same to J. Wine (.2)	\$	28.00
January-21	Claims Administration & Objections	1/29/2021	AW	140	0.1 draft email response to claimant regarding past hearing and call with J. Wine regarding same (.1)	\$	14.00
January-21	Claims Administration & Objections	1/29/2021	AW	140	0.1 request update to claims portal (.1)	\$	14.00
January-21	Claims Administration & Objections	1/29/2021	AW	140	0.1 attention to email from courtroom deputy regarding scheduled hearing and update docket (.1)	\$	14.00
January-21	Claims Administration & Objections	1/29/2021	AW	140	0.1 attention to entered order changing conference ID for claimants and request update to Receivership web page (.1)	\$	14.00
January-21	Claims Administration & Objections	1/29/2021	AW	140	0.2 call with J. Wine regarding hearing and proposed schedule (.2).	\$	28.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 125 of 157 PageID #:65158

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
January-21	Claims Administration &	1/29/2021	JRW	on 260	0.4 Prepare for hearing before Judge Lee on claims process (.4)	\$	104.00
•	Objections Claims Administration &	1/29/2021	JRW	260	1 related conference with M. Rachlis and K. Duff regarding hearing preparation (1.0)	\$	260.00
•	Objections						
•	Claims Administration & Objections	1/29/2021	JRW	260	0.3 telephone conference with SEC (.3)	\$	78.00
January-21	Claims Administration & Objections	1/29/2021	JRW	260	1.6 appearance at hearing before Judge Lee regarding claims process (1.6)	\$	416.00
January-21	Claims Administration & Objections	1/29/2021	JRW	260	0.1 attention to inquiry from claimant's counsel (.1)	\$	26.00
January-21	Claims Administration & Objections	1/29/2021	JRW	260	0.1 correspondence from court clerk regarding revision of proposed order (.1)	\$	26.00
January-21	Claims Administration &	1/29/2021	JRW	260	0.7 research regarding EB documents (.7).	\$	182.00
January-21	Objections Claims Administration &	1/29/2021	MR	390	1 Prepare for upcoming hearing (1.0)	\$	390.00
January-21	Objections Claims Administration &	1/29/2021	MR	390	1 participate in meetings regarding hearing with K. Duff and J. Wine (1.0)	\$	390.00
January-21	Objections Claims Administration &	1/29/2021	MR	390	0.3 conference with SEC (.3)	\$	117.00
Januarv-21	Objections Claims Administration &	1/29/2021	MR	390	1.6 attend hearing (1.6)	\$	624.00
•	Objections Claims Administration &	1/29/2021	MR	390	0.3 follow up regarding hearing with K. Duff (.3).	\$	117.00
•	Objections Claims Administration &	2/1/2021	KBD	390		\$	39.00
•	Objections				0.1 work on response to claimants (.1)	·	
_	Claims Administration & Objections	2/1/2021	KBD	390	0.1 exchange correspondence with J. Wine regarding confidentiality order and opt-outs (.1)	\$	39.00
February-21	Claims Administration & Objections	2/1/2021	KBD	390	0.3 study proposed tranche groupings and related correspondence (.3)	\$	117.00
February-21	Claims Administration & Objections	2/1/2021	KBD	390	0.2 study revised claims process outline (.2).	\$	78.00
February-21	Claims Administration & Objections	2/2/2021	KBD	390	0.8 Exchange correspondence regarding claimants' communications about claims process.	\$	312.00
February-21	Claims Administration &	2/3/2021	KBD	390	0.4 study and revise claims process outline and exchange correspondence with J. Wine and M. Rachlis regarding	\$	156.00
February-21	Objections Claims Administration &	2/3/2021	KBD	390	changes (.4) 0.4 work on responses to claimants (.4).	\$	156.00
February-21	Objections Claims Administration &	2/4/2021	KBD	390	1.5 Work on claims process outline and grouping of properties for claims process and exchange various	\$	585.00
February-21	Objections Claims Administration &	2/4/2021	KBD	390	correspondence relating to process (1.5) 0.2 work on responses to claimants (.2).	\$	78.00
February-21	Objections Claims Administration &	2/5/2021	KBD	390	0.6 Work on claims process outline and exchange various related correspondence (.6)	\$	234.00
February-21	Objections Claims Administration &	2/5/2021	KBD	390	0.2 review proposed grouping of properties (.2).	\$	78.00
•	Objections Claims Administration &	2/8/2021	KBD	390	0.1 Attention to claimants' counsel's request for records (.1)	\$	39.00
•	Objections	2/8/2021	KBD			·	39.00
•	Claims Administration & Objections			390	0.1 exchange correspondence regarding hearing before Judge Lee (.1).	\$	
February-21	Claims Administration & Objections	2/9/2021	KBD	390	0.5 Work on communications with claimants regarding claims process (.5)	\$	195.00
February-21	Claims Administration & Objections	2/9/2021	KBD	390	0.1 attention to execution of vendor agreement and order approving engagement (.1).	\$	39.00
February-21	Claims Administration & Objections	2/10/2021	KBD	390	0.2 work on investigation of records regarding claims issue (.2)	\$	78.00
February-21	Claims Administration & Objections	2/10/2021	KBD	390	0.2 attention to hard drive for claims vendor (.2).	\$	78.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 126 of 157 PageID #:65159

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Ob	jection
	Keeper	Rate	Hours	Descripti on	Cost		
	Claims Administration & Objections	2/10/2021	KBD	390	0.8 Telephone conference with claimants' counsel, M. Rachlis, and J. Wine regarding claims and various related procedural issues (.8)	\$	312.00
	Claims Administration & Objections	2/10/2021	KBD	390	0.3 follow up conversation with M. Rachlis and J. Wine relating to claimants' request for records (.3)	\$	117.00
•	Claims Administration & Objections	2/11/2021	KBD	390	0.2 attention to action items with claims vendor (.2).	\$	78.00
	Claims Administration & Objections	2/12/2021	KBD	390	1 confer with J. Wine and M. Rachlis regarding claims review and claims distribution (1.0)	\$	390.00
February-21	Claims Administration & Objections	2/15/2021	KBD	390	0.4 Work on responses to claimants regarding claims and claims process.	\$	156.00
•	Claims Administration & Objections	2/17/2021	KBD	390	0.2 Attention to communication from claimants (.2)	\$	78.00
February-21	Claims Administration & Objections	2/17/2021	KBD	390	0.3 exchange correspondence with J. Wine regarding claims vendors, contracts, logistics, and related issues (.3).	\$	117.00
February-21	Claims Administration & Objections	2/18/2021	KBD	390	0.2 Study hearing transcript and exchange correspondence with J. Wine regarding expert discovery.	\$	78.00
February-21	Claims Administration & Objections	2/19/2021	KBD	390	0.2 Attention to claimant communication.	\$	78.00
February-21	Claims Administration & Objections	2/23/2021	KBD	390	0.1 Exchange correspondence with J. Wine regarding notice of opt-outs.	\$	39.00
February-21	Claims Administration & Objections	2/24/2021	KBD	390	0.4 analysis of interest payment issue relating to all claimants (.4)	\$	156.00
February-21	Claims Administration & Objections	2/24/2021	KBD	390	0.1 exchange correspondence with J. Wine regarding notice of opt-outs (.1)	\$	39.00
February-21	Claims Administration & Objections	2/24/2021	KBD	390	0.4 work on response to claimants (.4).	\$	156.00
February-21	Claims Administration & Objections	2/25/2021	KBD	390	0.7 Work with J. Wine and M. Rachlis regarding logistics for distribution of claims documentation (.7)	\$	273.00
February-21	Claims Administration & Objections	2/25/2021	KBD	390	0.3 study and revise notice and correspondence to claimants regarding opt-outs and claims documentation (.3)	\$	117.00
February-21	Claims Administration & Objections	2/25/2021	KBD	390	0.2 exchange correspondence regarding inventory of EB documents (.2)	\$	78.00
February-21	Claims Administration & Objections	2/25/2021	KBD	390	0.1 attention to claimant communications (.1).	\$	39.00
February-21	Claims Administration & Objections	2/26/2021	KBD	390	0.1 Attention to claimant communication.	\$	39.00
	Asset Disposition	2/3/2021	JR	140	0.3 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)	\$	42.00
February-21 <i>i</i>	Asset Disposition	2/11/2021	JR	140	0.1 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)	\$	14.00
February-21 /	Asset Disposition	2/12/2021	JR	140	0.3 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)	\$	42.00
	Business Operations Business Operations	2/10/2021 2/16/2021	KMP AW	140 140	Work on updating list of EB entities with tax identification numbers. Communicate with counsel regarding second confidentiality order and serve via email on claimants (.6)	\$ \$	336.00 84.00
	Business Operations Business Operations	2/17/2021	JRW	260	Communicate with course regarding second confidentiality order and serve via entail on claimants (.6) Correspondence to City of Chicago ownership dispute division regarding new administrative matter (1449 N Talman Avenue) (.3)	\$ \$	78.00
February-21 I	Business Operations	2/17/2021	KMP	140	0.9 review bank records and annotate property account balance schedule to reflect source of funds (.9)	\$	126.00
	Claims Administration & Objections	2/1/2021	AW	140	0.2 Respond by email to claimant's voice message and claimant's counsel (.2)	\$	28.00
	Claims Administration & Objections	2/1/2021	AW	140	0.1 follow up with K. Duff and J. Wine regarding standing of entities issues raised by claimants (.1)	\$	14.00
	Claims Administration & Objections	2/1/2021	AW	140	0.2 review email communication with claims vendor to establish requested revisions and updates in last quarter (.2)	\$	28.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 127 of 157 PageID #:65160

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Ob	jection
	Keeper	Rate	Hours	Descripti on	Cost		
February-21	Claims Administration & Objections	2/1/2021	AW	140	1.8 start work on group assignments, establish split per claims numbers, and email exchanges and calls with J. Wine regarding finalization of same (1.8).	\$	252.00
February-21	Claims Administration & Objections	2/1/2021	JRW	260	0.2 Revise draft proposed order in accordance with court's directive and forward same to courtroom deputy (.2)	\$	52.00
February-21	Claims Administration & Objections	2/1/2021	JRW	260	0.3 confer with A. Watychowicz regarding updating claims records with vendors (.3)	\$	78.00
February-21	Claims Administration & Objections	2/1/2021	JRW	260	0.2 telephone conference with claimant's counsel regarding EquityBuild documents (.2)	\$	52.00
February-21	Claims Administration & Objections	2/1/2021	JRW	260	1.8 attention to drafting revised case management order incorporating court's rulings regarding claims process (1.8)	\$	468.00
February-21	Claims Administration & Objections	2/1/2021	JRW	260	0.9 work with A. Watychowicz on exhibit listing groupings of properties and related exchange with M. Rachlis (.9).	\$	234.00
February-21	Claims Administration & Objections	2/1/2021	MR	390	0.6 Attention to proposed order on claims related issues and exchanges with J. Wine regarding order and property groupings.	\$	234.00
February-21	Claims Administration & Objections	2/2/2021	AW	140	1.3 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)	\$	182.00
February-21	Claims Administration & Objections	2/2/2021	AW	140	0.9 respond to claimants' voice messages, update requests, and other emails (.9)	\$	126.00
February-21	Claims Administration & Objections	2/2/2021	AW	140	0.9 continue and complete work on properties group assignments and communicate with J. Wine regarding same (.9)	\$	126.00
February-21	Claims Administration & Objections	2/2/2021	AW	140	0.1 update contact information per claimants request (.1)	\$	14.00
February-21	Claims Administration & Objections	2/2/2021	AW	140	0.2 attention to entered order regarding grouping, lien issues, and claims process and update docket (.2)	\$	28.00
February-21	Claims Administration & Objections	2/2/2021	JRW	260	0.2 review court order and related email exchange with counsel for claimants (.2)	\$	52.00
February-21	Claims Administration & Objections	2/2/2021	JRW	260	0.7 revise exhibit regarding proposed tranches for claims process (.7).	\$	182.00
February-21	Claims Administration & Objections	2/3/2021	AW	140	0.7 Review claims and other data and respond to claimants' emails (.7)	\$	98.00
February-21	Claims Administration & Objections	2/3/2021	AW	140	0.3 review of claim and correspond with J. Wine regarding same and proposed request to claimant (.3)	\$	42.00
February-21	Claims Administration & Objections	2/3/2021	AW	140	0.1 communicate with K. Pritchard regarding master claims list and unique claimant list (.1).	\$	14.00
February-21	Claims Administration & Objections	2/3/2021	JRW	260	0.2 exchange correspondence with M. Rachlis regarding court's request for proposed order summarizing rulings on claims process (.2)	\$	52.00
February-21	Claims Administration & Objections	2/3/2021	JRW	260	0.9 review redline of claims process outline, further revise to incorporate comments, convert to proposed order, further revision to incorporate comments regarding same, and circulate proposed order to claimants' counsel and SEC (.9).	\$	234.00
February-21	Claims Administration &	2/3/2021	MR	390	1 Attention to claims related outline and follow up with K. Duff and J. Wine (1.0)	\$	390.00
February-21	Objections Claims Administration &	2/3/2021	MR	390	0.1 follow up regarding issues regarding request for order (.1).	\$	39.00
February-21	Objections Claims Administration &	2/4/2021	AW	140	0.2 Attention to email from claimant requesting to update her contact information, process her request, and email	\$	28.00
February-21	Objections Claims Administration &	2/4/2021	AW	140	confirmation (.2) 0.1 communicate with J. Wine regarding submitted claim and proposed revisions (.1).	\$	14.00
February-21	Objections Claims Administration &	2/4/2021	JRW	260	0.2 Telephone conferences with SEC (.2)	\$	52.00
February-21	Objections Claims Administration &	2/4/2021	JRW	260	0.6 study claim forms and supporting documents and related email exchange with A. Watychowicz and K. Duff (.6)	\$	156.00
February-21	Objections Claims Administration &	2/4/2021	JRW	260	0.2 correspondence with M. Rachlis regarding exhibit of proposed tranches (.2)	\$	52.00
February-21	Objections Claims Administration &	2/4/2021	JRW	260	3.4 multiple rounds of comments from claimant's counsel, K. Duff, M. Rachlis and SEC on proposed order	\$	884.00
February-21	Objections Claims Administration & Objections	2/4/2021	JRW	260	regarding claims process, and further revision of same (3.4) 0.1 email to courtroom deputy regarding entry of proposed order (.1).	\$	26.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 128 of 157 PageID #:65161

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
February-21	Claims Administration &	2/4/2021	MR	on 390	1.2 Attention to various issues on tranches and claims related issues.	\$	468.00
February-21	Objections Claims Administration &	2/5/2021	AW	140	0.1 Attention to email communication regarding grouping of properties (.1)	\$	14.00
February-21	Objections Claims Administration &	2/5/2021	AW	140	0.1 email suggested revisions to filing notice (.1)	\$	14.00
February-21	Objections Claims Administration & Objections	2/5/2021	AW	140	0.1 file approved notice and grouping (.1).	\$	14.00
February-21	Claims Administration & Objections	2/5/2021	JRW	260	O.6 Correspond with claimants' counsel regarding final revisions to proposed order and related communications with K. Duff and M. Rachlis and revision of document.	\$	156.00
February-21	Claims Administration & Objections	2/5/2021	MR	390	0.6 Attention to revisions regarding draft order on claims process and follow up emails regarding same (.6)	\$	234.00
February-21	Claims Administration &	2/5/2021	MR	390	0.1 communications regarding same with Court (.1)	\$	39.00
February-21	Objections Claims Administration &	2/5/2021	MR	390	0.3 review chart on claims process issues (.3).	\$	117.00
February-21	Objections Claims Administration &	2/8/2021	AW	140	0.1 Respond to claimant's update request (.1)	\$	14.00
February-21	Objections Claims Administration &	2/8/2021	JRW	260	0.2 review claims review analysis (.2).	\$	52.00
February-21	Objections Claims Administration &	2/9/2021	AW	140	0.2 Attention to email from claimant requesting to update her contact information, process her request, and email	\$	28.00
February-21	Objections Claims Administration &	2/9/2021	AW	140	confirmation (.2) 0.2 attention to and revise proposed email to claimants regarding entered orders (.2)	\$	28.00
February-21	Objections Claims Administration &	2/9/2021	AW	140	0.2 work with J. Wine and K. Pritchard on finalization of email (.2)	\$	28.00
February-21	Objections Claims Administration &	2/9/2021	AW	140	0.7 serve entered order via email (.7)	\$	98.00
February-21	Objections Claims Administration & Objections	2/9/2021	AW	140	0.2 attention to email from claimant regarding grouping of properties and work with J. Wine and K. Duff on response (.2)	\$	28.00
February-21	Claims Administration & Objections	2/9/2021	AW	140	0.7 attention to numerous emails responding to claims process order and work on standard responses to same	\$	98.00
February-21	Claims Administration & Objections	2/9/2021	AW	140	(.7) 0.3 respond to claimants emails (.3)	\$	42.00
February-21	Claims Administration & Objections	2/9/2021	AW	140	0.4 attention to entered orders relating to claims process, review, and discuss changes applied to proposed drafts by the Judge (.4)	\$	56.00
February-21	Claims Administration & Objections	2/9/2021	AW	140	0.2 communicate with IT consultant regarding email project and how to obtain access to extracted emails (.2).	\$	28.00
February-21	Claims Administration &	2/9/2021	JR	140	1.1 Call with J. Wine and S. Zjalic related to claims process.	\$	154.00
February-21	Objections Claims Administration &	2/9/2021	JRW	260	0.9 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)	\$	234.00
February-21	Objections Claims Administration &	2/9/2021	JRW	260	0.2 confer with A. Watychowicz regarding service list (.2)	\$	52.00
February-21	Objections Claims Administration & Objections	2/9/2021	JRW	260	0.1 confer with K. Duff regarding vendor statement of work (.1)	\$	26.00
February-21	Claims Administration & Objections	2/9/2021	JRW	260	0.4 exchange correspondence with vendor regarding claims distribution project (.4)	\$	104.00
February-21	Claims Administration &	2/9/2021	JRW	260	1.1 work with S. Zjalic and J. Rak on next stage of claims review process (1.1)	\$	286.00
February-21	Objections Claims Administration & Objections	2/9/2021	JRW	260	0.1 related follow-up regarding property numbers (.1)	\$	26.00
February-21	Claims Administration &	2/9/2021	KMP	140	0.2 Review and revise draft email to claimants regarding court orders relating to claims process and communicate with A. Watychowicz regarding same.	\$	28.00
February-21	Objections Claims Administration &	2/9/2021	SZ	110	with A. Watychowicz regarding same. 1.1 Meeting with J. Wine and J. Rak regarding review of the loans held against EBF properties.	\$	121.00
February-21	Objections Claims Administration & Objections	2/10/2021	AW	140	0.1 Update claimants claim as per email exchange with J. Wine (.1)	\$	14.00

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
February-21	Claims Administration & Objections	2/10/2021	AW	on 140	 continue work on drafts and responses to numerous emails rom claimants inresponse to order regarding claims process (2.8) 	\$	392.00
February-21	Claims Administration & Objections	2/10/2021	AW	140	0.8 work out a process for claimants' wo provided the Receiver with acknowlegments to be bound by agreed confidentiality order and claimants' who chose to opt-out, discuss same with J. Wine, and implement process (.8)	\$	112.00
February-21	Claims Administration & Objections	2/10/2021	AW	140	0.1 communicate with J. Wine regarding grouping of properties and completed email project associated with same (.1)	\$	14.00
February-21	Claims Administration & Objections	2/10/2021	AW	140	0.6 communicate with IT consultant regarding email project and follow up with K. Duff regarding volume of emails, reviewfolders selected by K. Duff for processing, and request transfer of files (.6)	\$	84.00
February-21	Claims Administration & Objections	2/10/2021	JRW	260	0.3 work with S. Zjalic on claims review project (.3)	\$	78.00
February-21	Claims Administration & Objections	2/10/2021	JRW	260	0.2 confer with e-discovery vendor and work with J. Rak and A. Watychowicz regarding shipment of files to claims vendor (.2)	\$	52.00
February-21	Claims Administration & Objections	2/10/2021	JRW	260	0.8 telephone conference with counsel for claimants and K. Duff regarding request for records (.8)	\$	208.00
February-21	Claims Administration & Objections	2/10/2021	JRW	260	0.3 conference with K. Duff and M. Rachilis regarding claimants' counsel's request for records (.3).	\$	78.00
February-21	Claims Administration & Objections	2/10/2021	MR	390	1 Review docket and preparation for conference regarding various vlaims issues (1.0)	\$	390.00
February-21	Claims Administration & Objections	2/10/2021	MR	390	0.9 participate in conference with counsel for claimant (.9)	\$	351.00
February-21	Claims Administration & Objections	2/10/2021	MR	390	0.3 communicate regarding conference with counsel for claimant with K. Duff and J. Wine (0.3).	\$	117.00
February-21	Claims Administration & Objections	2/11/2021	AW	140	1.2 continue work on drafts and responses to numerous from claimants in response to order regarding claims process (1.2)	\$	168.00
February-21	Claims Administration & Objections	2/11/2021	JRW	260	0.4 Attention to claimant inquiries regarding confidentiality order (.4)	\$	104.00
February-21	Claims Administration & Objections	2/11/2021	JRW	260	0.9 conference call with document vendor regarding process for distribution of claim forms (.6) and related follow-up email (.3)	\$	234.00
February-21	Claims Administration & Objections	2/11/2021	JRW	260	0.2 confer with claimants' counsel regarding vendor agreement and cursory review of quote and license agreement (.2).	\$	52.00
February-21	Claims Administration & Objections	2/12/2021	AW	140	O.8 Continue work on drafts and responses to emails and voice messages from claimants in response to order regarding claims process (.8)	\$	112.00
February-21	Claims Administration & Objections	2/12/2021	AW	140	0.1 communicate with K. Duff and M. Rachlis regarding emailing claimants second order relating to claims process (.1)	\$	14.00
February-21	Claims Administration & Objections	2/12/2021	AW	140	0.1 communicate with J. Wine regarding comments on master claims list (.1).	\$	14.00
February-21	Claims Administration & Objections	2/12/2021	JRW	260	0.3 Exchange correspondence with vendor regarding claims distribution project (.3)	\$	78.00
February-21	Claims Administration & Objections	2/12/2021	JRW	260	2.6 continue working on claims review and related communications with S. Zjalic and J. Rak (2.6)	\$	676.00
February-21	Claims Administration & Objections	2/12/2021	JRW	260	0.3 confer with A. Porter regarding institutional lender claims and provide files in response (.3)	\$	78.00
February-21	Claims Administration & Objections	2/12/2021	JRW	260	0.1 confer with A. Watychowicz regarding service of order (.1).	\$	26.00
February-21	Claims Administration & Objections	2/12/2021	MR	390	1.5 Participate in meeting regarding various issues on claims with K. Duff and J. Wine. (1.5)	\$	585.00
February-21	Claims Administration & Objections	2/12/2021	MR	390	0.3 attention to emails regarding claims process (.3).	\$	117.00
February-21	Claims Administration & Objections	2/14/2021	JRW	260	0.3 Confer with A. Porter regarding claims submitted by institutional lender and review related document.	\$	78.00
February-21	Claims Administration & Objections	2/15/2021	AW	140	0.1 Communicate with K. Duff and J. Wine regarding question from claimant (.1)	\$	14.00
February-21	Claims Administration & Objections	2/15/2021	AW	140	0.1 respond to claimant requesting contact info update, update files, and request update with claims vendor (.1)	\$	14.00
February-21	Claims Administration & Objections	2/15/2021	AW	140	0.9 attention to emails from claimants regarding acknowledgement forms and update requests and respond to same (.9)	\$	126.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 130 of 157 PageID #:65163

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
F				on			11.00
February-21	Claims Administration & Objections	2/15/2021	AW	140	0.1 email exchange with counsel regarding notification email to claimants about second order relating to claims process (.1)	\$	14.00
February-21	Claims Administration & Objections	2/15/2021	AW	140	0.1 supplement claimant emailing list (.1)	\$	14.00
February-21	Claims Administration &	2/15/2021	AW	140	0.4 review emails relating to claim issue and correspond with K. Duff and J. Wine regarding same (.4)	\$	56.00
February-21	Objections Claims Administration &	2/15/2021	AW	140	0.1 attention to voice message from claimant's assistant and communicate with K. Pritchard regarding same (.1)	\$	14.00
February-21	Objections Claims Administration & Objections	2/15/2021	AW	140	0.1 communicate with IT consultant regarding email project (.1)	\$	14.00
February-21	Claims Administration & Objections	2/15/2021	AW	140	0.1 attention to packet mailed in relation to promissory note assignment and email counsel regarding same (.1).	\$	14.00
February-21	Claims Administration & Objections	2/15/2021	JRW	260	0.3 Exchange correspondence with A. Porter regarding claims submitted by institutional lender (.3)	\$	78.00
February-21	Claims Administration & Objections	2/15/2021	JRW	260	0.1 confer with A. Watychowicz regarding service of second order regarding claims process (.1)	\$	26.00
February-21	Claims Administration &	2/15/2021	JRW	260	1.7 preparation of property list for vendor and related review claims against funds to add to property list (1.7)	\$	442.00
February-21	Objections Claims Administration &	2/15/2021	JRW	260	0.4 review file listing from vendor and related correspondence regarding unmatched claims (.4).	\$	104.00
February-21	Objections Claims Administration & Objections	2/16/2021	AW	140	0.6 Respond to emails from claimants regarding confidentiality order (.6)	\$	84.00
February-21	Claims Administration &	2/16/2021	AW	140	0.1 communicate with A. Porter regarding institutional lender claim (.1)	\$	14.00
February-21	Objections Claims Administration &	2/16/2021	JR	140	0.4 exchange correspondence with S. Zjalic, A. Porter and J. Wine regarding same (.4).	\$	56.00
February-21	Objections Claims Administration & Objections	2/16/2021	JRW	260	0.5 correspond with document vendor regarding files transferred and related review of file listing (.5)	\$	130.00
February-21	Claims Administration & Objections	2/16/2021	JRW	260	0.5 conference call with document vendor and A. Watychowicz regarding claims distribution project (.5)	\$	130.00
February-21	Claims Administration & Objections	2/16/2021	JRW	260	0.5 revise property number list for vendor and related telephone conference with A. Watychowicz (.5)	\$	130.00
February-21	Claims Administration & Objections	2/16/2021	KMP	140	0.3 Review various pleadings relating to motion practice on claims process and communicate with K. Duff regarding same.	\$	42.00
February-21	Claims Administration & Objections	2/17/2021	AW	140	Respond to emails from claimants regarding confidentiality order, general update, and contact information updates (.9)	\$	126.00
February-21	Claims Administration & Objections	2/17/2021	AW	140	0.1 request update to claimants contact information (.1)	\$	14.00
February-21	Claims Administration & Objections	2/17/2021	AW	140	0.3 review email files and communicate with IT consultant regarding additional folders needed to complete email project (.3).	\$	42.00
February-21	Claims Administration & Objections	2/17/2021	JRW	260	0.8 Study vendor agreements and send analysis regarding same to M. Rachlis and K. Duff (.8)	\$	208.00
February-21	Claims Administration & Objections	2/17/2021	JRW	260	0.3 correspondence to claimants' counsel regarding comments on proposed vendor contracts (.3).	\$	78.00
February-21	Claims Administration & Objections	2/17/2021	MR	390	0.2 Attention to issues regarding vendor agreements regarding document library.	\$	78.00
February-21	Claims Administration & Objections	2/18/2021	AW	140	0.6 respond to emails from claimants regarding confidentiality order (.6).	\$	84.00
February-21	Claims Administration & Objections	2/18/2021	JRW	260	0.3 Review transcript of hearing on claims process and related analysis (.3)	\$	78.00
February-21	Claims Administration & Objections	2/18/2021	JRW	260	0.7 drafting of correspondence to claimants regarding process and links to download claims documentation (.7)	\$	182.00
February-21	Claims Administration & Objections	2/18/2021	JRW	260	0.2 correspondence with document vendor regarding test emails to claimants (.2).	\$	52.00
February-21	Claims Administration & Objections	2/19/2021	JRW	260	0.1 Email exchange with vendor regarding encryption of claimant emails (.1)	\$	26.00
February-21	Claims Administration & Objections	2/20/2021	JRW	260	0.1 Correspond with K. Duff regarding claimant's claim (.1)	\$	26.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 131 of 157 PageID #:65164

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Ob	jection
	Keeper	Rate	Hours	Descripti on	Cost		
February-21	Claims Administration & Objections	2/20/2021	JRW	260	0.3 review agreement with document vendor (.3).	\$	78.00
February-21	Claims Administration & Objections	2/22/2021	JRW	260	0.4 Review vendor license agreement and software quote and related correspondence with claimant's counsel (.4)	\$	104.00
February-21	Claims Administration & Objections	2/22/2021	KMP	140	0.2 Attention to correspondence from claimant regarding executed acknowledgment and confer with J. Wine regarding same.	\$	28.00
February-21	Claims Administration & Objections	2/24/2021	JRW	260	0.7 correspond with vendor regarding encryption of emails and draft message for email sending passwords to claimants (.7)	\$	182.00
February-21	Claims Administration &	2/24/2021	JRW	260	0.3 prepare notice of optouts for filing (.3).	\$	78.00
February-21	Objections Claims Administration &	2/24/2021	KMP	140	0.2 Communicate with J. Wine regarding draft notice of opt-out claimants.	\$	28.00
February-21	Objections Claims Administration &	2/25/2021	JRW	260	0.4 Draft email to claimants regarding distribution of claims documentation (.4)	\$	104.00
February-21	Objections Claims Administration &	2/25/2021	JRW	260	0.2 finalize opt-out notice for filing (.2)	\$	52.00
February-21	Objections Claims Administration &	2/25/2021	JRW	260	0.2 confer with K. Pritchard regarding service of motions and notice (.2)	\$	52.00
February-21	Objections Claims Administration &	2/25/2021	JRW	260	0.7 conference with K. Duff and M. Rachlis regarding procedures for distribution of claim forms and EquityBuild	\$	182.00
February-21	Objections Claims Administration &	2/25/2021	JRW	260	documents (.7) 0.3 exchange correspondence with documents vendor regarding customization of emails, cover email to	\$	78.00
February-21	Objections Claims Administration &	2/25/2021	JRW	260	claimants, and procedures regarding same (.3) 0.3 confer with J. Rak regarding EquityBuild documents and related email exchanges with J. Rak and K. Duff (.3)	\$	78.00
February-21	Objections Claims Administration &	2/25/2021	JRW	260	0.3 respond to voice message from claimant (.3).	\$	78.00
February-21	Objections Claims Administration &	2/25/2021	KMP	140	0.5 Revise, finalize, and file notice of opt-out claimants, and confer with J. Wine regarding same (.5)	\$	70.00
February-21	Objections Claims Administration &	2/25/2021	KMP	140	0.3 prepare draft notice to claimants of filing of opt-out notice and communicate with J. Wine regarding same (.3).	\$	42.00
•	Objections Claims Administration &	2/25/2021	MR	390	0.7 Participate in meeting with K. Duff and J. Wine regarding claim form distribution (.7)	\$	273.00
	Objections Claims Administration &	2/25/2021	MR	390	0.4 furrier review of communications to claimants regarding claims form distribution and filing of notice (.4).	\$	156.00
•	Objections Claims Administration &	2/25/2021	SZ	110	0.2 Attention to a claimant's voice message and email communication with J. Wine about the same (.2).	\$	22.00
•	Objections Claims Administration &	2/26/2021	KMP	140	0.7 Revise, finalize, and prepare transmittal emails for notice to claimants of filing of opt-out notice.	\$	98.00
•	Objections					·	
	Business Operations	3/9/2021	KBD	390	0.1 Exchange correspondence with J. Rak and insurance broker regarding information for insurance renewal (.1)	\$	39.00
	Claims Administration & Objections	3/1/2021	KBD	390	0.3 Attention to claimants' communications regarding claims process (.3)	\$	117.00
	Claims Administration & Objections	3/2/2021	KBD	390	0.2 Exchange correspondence with J. Wine regarding claims process notice and service issue (.2)	\$	78.00
	Claims Administration & Objections	3/2/2021	KBD	390	0.1 exchange correspondence with J. Wine regarding claimant communication and documentation issue (.1).	\$	39.00
March-21	Claims Administration & Objections	3/3/2021	KBD	390	0.2 Work on joint status report (.2)	\$	78.00
March-21	Claims Administration & Objections	3/3/2021	KBD	390	0.2 exchange correspondence with J. Wine and M. Rachlis regarding communication with claimants with claims documentation link (.2).	\$	78.00
March-21	Claims Administration & Objections	3/4/2021	KBD	390	0.4 Study joint status report and exchange correspondence with J. Wine and M. Rachlis regarding revisions (.4)	\$	156.00
March-21	Claims Administration & Objections	3/4/2021	KBD	390	0.4 work on responses to claimants (.4)	\$	156.00
March-21	Claims Administration & Objections	3/4/2021	KBD	390	0.2 attention to claims vendor agreement and proposed changes (.2).	\$	78.00
March-21	Claims Administration & Objections	3/5/2021	KBD	390	0.3 Attention to claimant communication and review of claims documentation (.3)	\$	117.00

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Ol	ojection
	Keeper	Rate	Hours	Descripti on	Cost		
	Claims Administration & Objections	3/5/2021	KBD	390	0.9 work on joint status report and exchange various related correspondence (.9).	\$	351.00
March-21	Claims Administration &	3/8/2021	KBD	390	0.2 Work on communications with claimants relating to distribution of claims documentation.	\$	78.00
	Objections Claims Administration &	3/9/2021	KBD	390	0.1 exchange correspondence regarding communications with claimants (.1)	\$	39.00
	Objections Claims Administration &	3/9/2021	KBD	390	0.2 study inventory of EB documents (.2).	\$	78.00
	Objections Claims Administration &	3/10/2021	KBD	390	0.1 Telephone conference with and study correspondence from IT consultant regarding copying and preparation	\$	39.00
	Objections				of electronic records for production (.1)	•	
	Claims Administration & Objections	3/10/2021	KBD	390	0.1 exchange correspondence with J. Wine regarding claims process and counsel for claimants (.1)	\$	39.00
March-21	Claims Administration &	3/10/2021	KBD	390	0.1 exchange correspondence with J. Wine regarding property groupings for claims process (.1).	\$	39.00
March-21	Objections Claims Administration &	3/11/2021	KBD	390	0.4 Telephone conference with M. Rachlis regarding claims process issues and planning (.4)	\$	156.00
	Objections Claims Administration &	3/15/2021	KBD	390	0.5 further discussions with IT consultant (.5)	\$	195.00
	Objections Claims Administration &	3/17/2021	KBD	390	0.2 Exchange correspondence regarding claims vendor work with EB records (.2)	\$	78.00
	Objections					·	
	Claims Administration & Objections	3/18/2021	KBD	390	0.1 study correspondence relating to communications with claimants regarding claims documentation (.1).	\$	39.00
March-21	Claims Administration & Objections	3/19/2021	KBD	390	0.2 exchange correspondence with J. Wine regarding communications with claimants relating to claims process (.2).	\$	78.00
March-21	Claims Administration &	3/22/2021	KBD	390	0.2 Exchange correspondence with J. Rak regarding vendor for review of electronic records (.2)	\$	78.00
	Objections Claims Administration &	3/22/2021	KBD	390	0.1 exchange correspondence with J. Wine regarding communications with claimants regarding claims	\$	39.00
	Objections Claims Administration &	3/23/2021	KBD	390	documentation and claims process (.1). 0.1 Study correspondence from claimants' counsel regarding request for records .	\$	39.00
	Objections					•	
	Claims Administration & Objections	3/24/2021	KBD	390	0.2 Study correspondence from and brief telephone conference with claimants' counsel regarding request for claims documentation (.2)	\$	78.00
	Claims Administration & Objections	3/24/2021	KBD	390	0.7 confer with M. Rachlis and J. Wine regarding claimants' counsel's request for claims documentation (.7)	\$	273.00
March-21	Claims Administration &	3/24/2021	KBD	390	0.5 draft response to correspondence from claimants' counsel regarding request for claims documentation and	\$	195.00
	Objections Claims Administration &	3/25/2021	KBD	390	exchange correspondence with J. Wine regarding revisions (.5) 0.8 Draft correspondence to claimants regarding claims process (.8)	\$	312.00
	Objections Claims Administration &	3/25/2021	KBD	390	0.3 revise correspondence to claimants' counsel regarding request for records and exchange correspondence with	າ \$	117.00
	Objections				J. Wine and M. Rachlis regarding same (.3)	\$	
	Claims Administration & Objections	3/25/2021	KBD	390	0.1 exchange correspondence with J. Wine regarding claimant communications regarding claims process (.1).	·	39.00
	Claims Administration & Objections	3/26/2021	KBD	390	1.2 Telephone conferences and exchange correspondence with J. Wine regarding communication with claimants relating to claims process and claims documentation (1.2)	\$	468.00
March-21	Claims Administration & Objections	3/26/2021	KBD	390	1.4 draft and revise correspondence to claimants regarding claims process (1.4)	\$	546.00
March-21	Claims Administration &	3/26/2021	KBD	390	0.1 attention to communication from claimant regarding claims process (.1)	\$	39.00
	Objections Claims Administration &	3/26/2021	KBD	390	0.1 exchange correspondence with J. Rak regarding vendor communication and electronic records (.1)	\$	39.00
	Objections Claims Administration &	3/27/2021	KBD	390	0.2 Attention to communications from claimants regarding claims process.	\$	78.00
	Objections					-	
	Claims Administration & Objections	3/28/2021	KBD	390	0.6 Legal research regarding issues relating to claims issues and exchange correspondence with J. Wine regarding same.	\$	234.00
	Claims Administration & Objections	3/29/2021	KBD	390	0.3 Draft correspondence to claimants' counsel regarding records request (.3)	\$	117.00
March-21	Claims Administration & Objections	3/29/2021	KBD	390	0.1 exchange related correspondence with M. Rachlis regarding claimants' records request (.1)	\$	39.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 133 of 157 PageID #:65166

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
	Claims Administration & Objections	3/29/2021	KBD	on 390	0.2 work on responses to claimants (.2).	\$	78.00
March-21	Claims Administration & Objections	3/31/2021	KBD	390	0.2 Work on responses to claimants regarding claims process (.2)	\$	78.00
March-21	Asset Disposition Business Operations	3/16/2021 3/17/2021	JR KMP	140 140	0.2 Review email from K. Duff and provide requested property information and closing dates (.2)0.3 confer with K. Duff, J. Wine and A. Watychowicz regarding communication from vendor representative relating	\$ \$	28.00 42.00
	Claims Administration &	3/1/2021	JRW	260	to request for payment for software hosting platform (.3). 0.1 Correspondence with vendor and claimants' counsel regarding vendor contracts (.1)	\$	26.00
March-21	Objections Claims Administration & Objections	3/1/2021	JRW	260	0.2 related correspondence with claimants' counsel (.2)	\$	52.00
March-21	Claims Administration & Objections	3/1/2021	JRW	260	0.2 correspondence with K. Duff and M. Rachlis regarding claims process (.2)	\$	52.00
March-21	Claims Administration & Objections	3/1/2021	JRW	260	0.2 correspondence with M. Rachlis and K. Duff regarding updates to claimant information (.2)	\$	52.00
March-21	Claims Administration & Objections	3/2/2021	JRW	260	0.2 Telephone conference with J. Rak regarding EquityBuild documents (.2)	\$	52.00
March-21	Claims Administration & Objections	3/2/2021	JRW	260	0.3 confer with K. Pritchard regarding updates to claimant contact information and email bounce-backs (.3)	\$	78.00
March-21	Claims Administration & Objections	3/2/2021	JRW	260	0.2 exchange correspondence with K. Duff and M. Rachlis regarding procedures for claim distribution (.2)	\$	52.00
March-21	Claims Administration & Objections	3/2/2021	JRW	260	0.5 draft email to claimants regarding passwords and links to claims documentation and related revisions from M. Rachlis (.5)	\$	130.00
March-21	Claims Administration & Objections	3/2/2021	JRW	260	1.1 telephone conference with e-discovery vendors and counsel for claimants (1.1)	\$	286.00
March-21	Claims Administration & Objections	3/2/2021	JRW	260	0.1 confer with J. Rak regarding EquityBuild document transfer (.1)	\$	26.00
	Claims Administration & Objections	3/2/2021	JRW	260	0.1 exchange correspondence with claimant's counsel regarding document hosting (.1).	\$	26.00
	Claims Administration & Objections	3/2/2021	KMP	140	0.2 Communications with J. Wine regarding issues relating to recent correspondence to claimants.	\$	28.00
	Claims Administration & Objections	3/2/2021	MR	390	0.3 Attention to communications from J. Wine regarding procedures for claim distribution and communication regarding claims documentation.	\$	117.00
	Claims Administration & Objections	3/3/2021	JR	140	1.9 Locate documents on the EquityBuild computer related to the inventory project (1.9)	\$	266.00
	Claims Administration & Objections	3/3/2021	JR	140	0.9 exchange correspondence with A. Watychowicz, J. Wine, S. Zjalic and IT consultant regarding same (.9).	\$	126.00
	Claims Administration & Objections	3/3/2021	JRW	260	0.1 confer with J. Rak regarding EquityBuild documents (.1)	\$	26.00
	Claims Administration & Objections	3/3/2021	JRW	260	0.4 begin drafting joint claims status report (.4)	\$	104.00
	Claims Administration & Objections	3/3/2021	JRW	260	0.1 communications with K. Duff and M. Rachlis regarding claims status report (.1)	\$	26.00
	Claims Administration & Objections	3/3/2021	JRW	260	0.5 revise draft email to claimants from vendor and related exchange of correspondence with vendor (.5)	\$	130.00
	Claims Administration & Objections	3/3/2021	JRW	260	0.4 review revised license agreement from vendor and related correspondence to claimants' counsel (.4).	\$	104.00
	Claims Administration & Objections	3/3/2021	MR	390	1 Review and work on issues and email to claimants for joint claims status report.	\$	390.00
	Claims Administration & Objections	3/4/2021	JR	140	0.4 Call with vendor and J. Wine regarding claims distribution project (.4)	\$	56.00
	Claims Administration & Objections	3/4/2021	JR	140	0.8 exchange correspondence with J. Wine regarding same (.8)	\$	112.00
	Claims Administration & Objections	3/4/2021	JR	140	5 review and update EquityBuild investor contact list related to the claims distribution project (5.0).	\$	700.00
	Claims Administration & Objections	3/4/2021	JRW	260	0.1 Confer with counsel for claimants regarding joint status report and requested extension (.1)	\$	26.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 134 of 157 PageID #:65167

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
	Claims Administration &	3/4/2021	JRW	on 260	2 prepare draft of status report and work with K. Duff and M. Rachlis on revisions to same (2.0)	\$	520.00
March-21	Objections Claims Administration & Objections	3/4/2021	JRW	260	0.3 conference call with claims distribution vendor and J. Rak regarding email lists and procedures (.3)	\$	78.00
March-21	Claims Administration & Objections	3/4/2021	JRW	260	0.7 work with J. Rak on clean-up of email lists and opt-outs (.7)	\$	182.00
March-21	Claims Administration & Objections	3/4/2021	JRW	260	0.1 confer with J. Rak regarding EquityBuild documents (.1)	\$	26.00
March-21	Claims Administration & Objections	3/4/2021	JRW	260	0.2 update service emails for City of Chicago and related email exchange (.2)	\$	52.00
	Claims Administration & Objections	3/4/2021	JRW	260	0.1 email exchange with SEC (.1)	\$	26.00
	Claims Administration & Objections	3/4/2021	MR	390	0.8 Review and work on status report and communicate regarding report with J. Wine and K. Duff (.8)	\$	312.00
	Claims Administration & Objections	3/4/2021	MR	390	0.2 attention to vendor issues and comments on agreement (.2).	\$	78.00
	Claims Administration & Objections	3/5/2021	JRW	260	1 Work with J. Rak and vendor on claims distribution project (1.0)	\$	260.00
	Claims Administration & Objections	3/5/2021	JRW	260	0.1 exchange correspondence with claimants' counsel regarding vendor contract (.1)	\$	26.00
	Claims Administration & Objections	3/5/2021	JRW	260	3.1 exchange multiple drafts and comments regarding joint status report with counsel for claimants, M. Rachlis and K. Duff and revise and finalize same for filing (3.1).	\$	806.00
	Claims Administration & Objections	3/5/2021	KMP	140	0.5 Confer with J. Wine regarding issues relating to claimants' emails and research same (.5)	\$	70.00
	Claims Administration & Objections	3/5/2021 3/5/2021	MR SZ	390 110	1.5 Further attention to joint claims status report and conferences regarding same with J. Wine and K. Duff.1.1 Attention to filing of joint claims status report and communication with J. Wine about same.	\$ \$	585.00 121.00
	Claims Administration & Objections Claims Administration &	3/6/2021	JR	140	Upload inventory list and records related to claims project from the EquityBuild records.	\$ \$	121.00
	Objections Claims Administration & Claims Administration &	3/8/2021	AEP	390	O.3 Review e-mail from J. Rak regarding assembly of all outstanding publicly recorded documents pertaining to	\$	117.00
	Objections	3/3/2021	ALI	000	various receivership properties and conduct follow up research regarding potential existence of as-yet unidentified EBF mortgage loans.	Ψ	117.00
	Claims Administration & Objections	3/8/2021	JR	140	0.6 Exchange correspondence with J. Wine regarding adding claimants' counsel to claim distribution list (.6)	\$	84.00
March-21	Claims Administration & Objections	3/8/2021	JR	140	5.6 update workbook with requested email contact content related to the claims distribution project (5.6).	\$	784.00
March-21	Claims Administration & Objections	3/8/2021	JRW	260	1.8 Work with J. Rak and vendor on claims distribution, opt outs, and adding counsel to email service lists (1.8)	\$	468.00
March-21	Claims Administration & Objections	3/8/2021	JRW	260	0.2 related email exchange with claimants' counsel (.2)	\$	52.00
	Claims Administration & Objections	3/9/2021	JR	140	6.1 Update workbook with requested email contact content related to the claims distribution project (6.1)	\$	854.00
	Claims Administration & Objections	3/9/2021	JR	140	0.1 exchange correspondence with IT consultant regarding preparation of EquityBuild electronic documents (.1)	\$	14.00
	Claims Administration & Objections	3/9/2021	JR	140	0.5 telephone call with K. Duff, J. Wine and IT consultant related to same (.5).	\$	70.00
	Claims Administration & Objections	3/9/2021	JRW	260	0.4 Telephone conference with claimant's counsel regarding redline of vendor agreement (.4)	\$	104.00
	Claims Administration & Objections	3/9/2021	JRW	260	0.5 work with J. Rak on adding counsel of record to property-specific email service lists (.5)	\$	130.00
	Claims Administration & Objections	3/9/2021	JRW	260	0.3 related research and exchange with claimants' counsel regarding appearances (.3)	\$	78.00
	Claims Administration & Objections	3/9/2021	JRW	260	0.9 telephone conference with K. Duff, J. Rak and IT consultants regarding EquityBuild documents (.9)	\$	234.00
	Claims Administration & Objections	3/9/2021	KMP	140	0.2 Attention to message from claimant regarding claim documents and confer with J. Wine regarding same.	\$	28.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 135 of 157 PageID #:65168

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
	aims Administration & viections	3/10/2021	JR	on 140	0.2 Review email from J. Wine and provide requested counsel of record information related to the claims distribution project (.2)	\$	28.00
March-21 Cla	aims Administration & bjections	3/10/2021	JR	140	2.5 review same and update worksheet related to the claims distribution project (2.5).	\$	350.00
March-21 Cla	aims Administration & viections	3/10/2021	JRW	260	0.2 Confer with J. Rak regarding email service lists for properties and counsel of record for same (.2)	\$	52.00
March-21 Cla	aims Administration & vijections	3/10/2021	JRW	260	0.2 telephone conference with counsel for claimants regarding claims process and title searches (.2).	\$	52.00
	aims Administration & vijections	3/11/2021	JR	140	0.5 Meeting with K. Duff and IT consultant regarding preparation of EquityBuild electronic records.	\$	70.00
	aims Administration & vjections	3/11/2021	JRW	260	0.1 confer with S. Zjalic regarding claims review (.1)	\$	26.00
	aims Administration & pjections	3/11/2021	JRW	260	0.5 study revised vendor agreement and related correspondence with claimants' counsel (.5).	\$	130.00
Ob	aims Administration & vjections	3/12/2021	AEP	390	1 Teleconference with K. Duff and J. Wine regarding strategy for analyzing claims.	\$	390.00
Ob	aims Administration & vjections	3/15/2021	JR	140	0.4 Telephone conference with K. Duff, J. Wine and IT consultant related to EquityBuild electronic records.	\$	56.00
Ob	aims Administration & ejections	3/16/2021	JR 	140	0.6 Exchange correspondence with IT consultant regarding preparation of EquityBuild electronic records (.6)	\$	84.00
Ob	aims Administration & bjections	3/16/2021	JR	140	0.1 review email from J. Wine and further exchange correspondence related to claimant's counsels email update (.1).	\$	14.00
Ob	aims Administration &	3/16/2021	JRW	260	0.2 confer with K. Duff regarding EquityBuild documents and cell phone records (.2)	\$	52.00
Ob	aims Administration & pjections	3/16/2021	JRW	260	0.2 review list of properties from claimant's counsel and related correspondence with J. Rak (.2).	\$ \$	52.00
Ok	aims Administration & jections aims Administration &	3/17/2021 3/17/2021	JR JR	140 140	Review email from K. Duff regarding contacting vendor and obtaining a license for opening various electronic records (.2)	\$	28.00 14.00
Ob	ojections aims Administration &	3/17/2021	JR	140	0.1 exchange correspondence with K. Pritchard and K. Duff regarding same (.1) 0.4 contact vendor regarding same (.4)	э \$	56.00
Ob	ojections aims Administration &	3/17/2021	JR	140	2.3 review email from J. Wine regarding updates to counsel email list for all lenders filing claims and update same	•	322.00
Ok	ojections Diaims Administration &	3/17/2021	JRW	260	(2.3). 0.1 Exchange emails with claimants' counsel regarding service emails (.1)	\$	26.00
Ob	ojections aims Administration &	3/17/2021	JRW	260	0.2 related email exchange with vendor regarding technical issues for claimant (.2)	\$	52.00
Ob	ejections aims Administration &	3/18/2021	JR	140	0.5 Exchange correspondence with vendor and gather information for obtaining a license related to accessing	\$	70.00
	ojections aims Administration &	3/18/2021	JR	140	electronic records (.5) 0.1 exchange correspondence with K. Duff regarding same (.1)	\$	14.00
	ojections aims Administration &	3/18/2021	JR	140	0.8 review email from J. Wine and update email list for claimants' counsel (.8).	\$	112.00
March-21 Cla	ojections aims Administration &	3/18/2021	JRW	260	0.5 exchange correspondence with J. Rak and documents vendor regarding distribution of claim forms (.5)	\$	130.00
March-21 Cla	ojections aims Administration &	3/19/2021	JR	140	0.2 Update email list for claimants counsel (.2)	\$	28.00
March-21 Cla	ojections aims Administration &	3/19/2021	JR	140	2.1 update lender email list (2.1)	\$	294.00
March-21 Cla	ojections aims Administration &	3/19/2021	JRW	260	0.2 Exchange correspondence with document vendor regarding updates to emails (.2)	\$	52.00
March-21 Cla	ojections aims Administration &	3/19/2021	JRW	260	0.3 research claim forms regarding address anomaly on master claims list and related exchange with J. Rak (.3)	\$	78.00
March-21 Cla	ojections aims Administration & ojections	3/19/2021	JRW	260	0.5 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)	\$	130.00

-	me	Time Keeper	Task	Task	Task Assessment Category	Obj	ection
Ke	eper	Rate	Hours	Descripti on	Cost		
March-21 Claims Administ Objections	tration &	3/22/2021	JRW	260	0.1 Exchange correspondence with A. Watychowicz regarding claimant records (.1)	\$	26.00
March-21 Claims Administ Objections	tration &	3/22/2021	JRW	260	0.1 exchange correspondence with claimants' counsel regarding requested extension (.1).	\$	26.00
March-21 Claims Administ Objections	tration &	3/23/2021	JR	140	0.6 Review emails from J. Wine pertaining to claimant request for email and address updates (.6)	\$	84.00
March-21 Claims Administ Objections	tration &	3/23/2021	JR	140	1.9 exchange further communication with J. Wine regarding same and complete all updates to claimant information on various workbooks (1.9).	\$	266.00
March-21 Claims Administ Objections	tration &	3/23/2021	JRW	260	2.3 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)	\$	598.00
March-21 Claims Administ Objections	tration &	3/24/2021	JRW	260	0.1 Confer with documents vendor regarding duplication of emails (.1)	\$	26.00
March-21 Claims Administ Objections	tration &	3/24/2021	JRW	260	0.5 conference with K. Duff and M. Rachlis regarding request for claims forms (.5)	\$	130.00
March-21 Claims Administ Objections	tration &	3/24/2021	JRW	260	0.6 review and revise draft correspondence to claimants' counsel regarding same (.6)	\$	156.00
March-21 Claims Administ Objections	tration &	3/24/2021	MR	390	0.5 Conference regarding claimants' counsel request for claims records with K. Duff and J. Wine.	\$	195.00
March-21 Claims Administ Objections	tration &	3/25/2021	AEP	390	0.2 review e-mail regarding accounts receivable correspondence from institutional lender and prepare response to J. Wine and K. Duff (.2).	\$	78.00
March-21 Claims Administ Objections	tration &	3/25/2021	JRW	260	0.1 exchange correspondence with vendor regarding project (.1)	\$	26.00
March-21 Claims Administ Objections	tration &	3/25/2021	JRW	260	0.2 correspondence with vendor regarding license agreement and related correspondence to K. Duff and J. Rak regarding EquityBuild documents (.2)	\$	52.00
March-21 Claims Administ Objections	tration &	3/25/2021	JRW	260	0.2 review and revise draft correspondence to claimant's counsel (.2)	\$	52.00
March-21 Claims Administ Objections	tration &	3/25/2021	JRW	260	0.1 correspond with vendor regarding claimant issue (.1).	\$	26.00
March-21 Claims Administ Objections	tration &	3/26/2021	JRW	260	1.1 review and revise draft email to claimants regarding claims process (1.1)	\$	286.00
March-21 Claims Administ Objections	tration &	3/26/2021	JRW	260	0.1 correspondence with documents vendor regarding claimant emails (.1).	\$	26.00
March-21 Claims Administ Objections	tration &	3/27/2021	MR	390	0.5 Review letter to claimants' counsel regarding request for claims records.	\$	195.00
March-21 Claims Administ Objections	tration &	3/29/2021	JR	140	0.2 Review email from J. Wine related to claimant email and address update, make recommended changes and send request to claims vendor.	\$	28.00
March-21 Claims Administ Objections	tration &	3/31/2021	JRW	260	0.3 Exchange correspondence with document vendor regarding claims distribution project (.3)	\$	78.00
April-21 Business Opera	tions	4/13/2021	KBD	390	0.4 study property manager financial reporting (7760 S Coles Avenue, 8000-02 S Justine Street, 8107-09 S Ellis Avenue, 8214-16 S Ingleside Avenue, 8209 S Ellis Avenue, 11117-11119 S Longwood Drive, 7300-04 S St Lawrence Avenue, 7957-59 S Marquette Road, 2736-44 W 64th Street, 6355-59 S Talman Avenue, 6356 S California 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, 4315-19 S Michigan Avenue, 7600-10 S Kingston Avenue, 7656-58 S Kingston Avenue, 6250 S Mozart Street, 7109-19 S Calumet Avenue, 9610 S Woodlawn Avenue, 1401 W 109th Place, 310 E 50th Street, 6807 S Indiana Avenue, 7237-43 S Bennett Avenue, 638-40 N Avers Avenue, 7255-57 S Euclid Avenue) (.4)	\$	156.00
April-21 Claims Administ Objections	tration &	4/1/2021	KBD	390	0.5 Telephone conference with claimants' counsel regarding request for claims documentation (.5)	\$	195.00
April-21 Claims Administ Objections	tration &	4/1/2021	KBD	390	0.1 exchange correspondence with J. Wine regarding claimants' counsel's request for claims documentation (.1)	\$	39.00
April-21 Claims Administ Objections	tration &	4/1/2021	KBD	390	0.2 telephone conference with M. Rachlis regarding recovery and inspection of EB documents (.2)	\$	78.00
April-21 Claims Administ Objections	tration &	4/1/2021	KBD	390	0.2 review and address email from claimant regarding claims documentation link issue and exchange related correspondence with J. Wine (.2).	\$	78.00
April-21 Claims Administ Objections	tration &	4/2/2021	KBD	390	0.1 Review vendor invoice and exchange related correspondence with J. Wine (.1)	\$	39.00
April-21 Claims Administ Objections	tration &	4/3/2021	KBD	390	0.2 Study vendor agreement and related correspondence.	\$	78.00

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
April-21 Claims Administration &	4/5/2021	KBD	on 390	0.1 Exchange correspondence regarding emails relating to claimant (.1)	\$	39.00
Objections April-21 Claims Administration & Objections	4/5/2021	KBD	390	0.3 study vendor agreement and exchange related correspondence with J. Wine regarding revisions (.3)	\$	117.00
April-21 Claims Administration & Objections	4/5/2021	KBD	390	0.1 attention to correspondence with potential claimant who did not submit claim (.1)	\$	39.00
April-21 Claims Administration & Objections	4/8/2021	KBD	390	0.1 Telephone conference with J. Wine regarding interim status report (.1)	\$	39.00
April-21 Claims Administration & Objections	4/8/2021	KBD	390	0.1 attention to communications from claimant and A. Porter relating to property sales, proceeds, and claims process (.1)	\$	39.00
April-21 Claims Administration & Objections	4/8/2021	KBD	390	0.5 study and revised draft joint status report and exchange related correspondence (.5)	\$	195.00
April-21 Claims Administration & Objections	4/8/2021	KBD	390	0.2 telephone conference with SEC (.2).	\$	78.00
April-21 Claims Administration & Objections	4/9/2021	KBD	390	0.5 Study and revise draft status report on claims and exchange related correspondence (.5)	\$	195.00
April-21 Claims Administration & Objections	4/9/2021	KBD	390	0.2 telephone conference with SEC (.2)	\$	78.00
April-21 Claims Administration & Objections	4/11/2021	KBD	390	0.2 Work on claims processing issues.	\$	78.00
April-21 Claims Administration & Objections	4/12/2021	KBD	390	0.1 Study correspondence from vendor regarding claims documentation distribution project status (.1)	\$	39.00
April-21 Claims Administration & Objections	4/12/2021	KBD	390	0.2 exchange correspondence with claimant regarding claims documentation and confidentiality issue (.2).	\$	78.00
April-21 Claims Administration & Objections	4/13/2021	KBD	390	0.3 work on correspondence with claimant regarding claims process timing (.3)	\$	117.00
April-21 Claims Administration & Objections	4/14/2021	KBD	390	0.3 revise joint status report on claims and exchange related correspondence with J. Wine (.3)	\$	117.00
April-21 Claims Administration & Objections	4/14/2021	KBD	390	0.1 exchange correspondence with J. Wine regarding vendor agreement (.1)	\$	39.00
April-21 Claims Administration & Objections	4/14/2021	KBD	390	0.2 study correspondence from claimants' counsel regarding potential subpoena for records (.2).	\$	78.00
April-21 Claims Administration & Objections	4/15/2021	KBD	390	0.7 Revise joint status report and exchange related correspondence with J. Wine (.7)	\$	273.00
April-21 Claims Administration & Objections	4/15/2021	KBD	390	0.2 telephone conference with J. Wine regarding joint status report (.2)	\$	78.00
April-21 Claims Administration & Objections	4/16/2021	KBD	390	0.2 Exchange correspondence with J. Wine and M. Rachlis regarding joint status report and review drafts of joint status report (.2)	\$	78.00
April-21 Claims Administration & Objections	4/16/2021	KBD	390	0.5 further work on joint status report and attempt to reconcile differences in positions of claims process participants (.5).	\$	195.00
April-21 Claims Administration & Objections	4/17/2021	KBD	390	0.1 Exchange correspondence with J. Wine regarding joint status report (.1)	\$	39.00
April-21 Claims Administration & Objections	4/17/2021	KBD	390	0.2 exchange correspondence relating to vendor access of EB online records (.2).	\$	78.00
April-21 Claims Administration & Objections	4/18/2021	KBD	390	0.2 Draft correspondence to claimants' counsel and SEC regarding joint status report (.2)	\$	78.00
April-21 Claims Administration & Objections	4/18/2021	KBD	390	0.2 exchange correspondence relating to vendor access of EB online records (.2).	\$	78.00
April-21 Claims Administration & Objections	4/19/2021	KBD	390	0.2 Exchange correspondence with claimants' counsel and SEC regarding joint status report (.2)	\$	78.00
April-21 Claims Administration & Objections	4/19/2021	KBD	390	0.3 attention to and exchange correspondence with K. Pritchard regarding filing of joint status report (.3)	\$	117.00
April-21 Claims Administration & Objections	4/19/2021	KBD	390	0.2 review correspondence regarding vendor access of EB online records and exchange correspondence with claimants' counsel relating to same (.2)	\$	78.00
April-21 Claims Administration & Objections	4/19/2021	KBD	390	0.2 draft correspondence to J. Wine regarding electronic records issues (.2)	\$	78.00
April-21 Claims Administration & Objections	4/19/2021	KBD	390	0.1 exchange correspondence with vendor regarding distribution of claims documentation to claimants (.1)	\$	39.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 138 of 157 PageID #:65171

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
April-21	Claims Administration & Objections	4/20/2021	KBD	on 390	0.3 Attention to communication with claimants regarding claims process (.3)	\$	117.00
April-21	Claims Administration & Objections	4/21/2021	KBD	390	0.3 Telephone conference with claimant's counsel regarding claims process (.3)	\$	117.00
April-21	Claims Administration & Objections	4/21/2021	KBD	390	0.2 attention to customer support emails for claims vendor (.2)	\$	78.00
April-21	Claims Administration & Objections	4/22/2021	KBD	390	0.2 Work on response to claimant communication relating to claims process.	\$	78.00
·	Claims Administration & Objections	4/23/2021	KBD	390	0.2 Study correspondence from J. Wine regarding discovery for claims process.	\$	78.00
·	Claims Administration & Objections	4/26/2021	KBD	390	0.1 Work on response to claimant (.1)	\$	39.00
·	Claims Administration & Objections	4/26/2021	KBD	390	0.4 study correspondence regarding claimants' request for records (.4)	\$	156.00
·	Claims Administration & Objections	4/26/2021 4/27/2021	KBD KBD	390 390	0.2 attention to vendor expense and document assembly efforts (.2).	\$ \$	78.00 78.00
·	Claims Administration & Objections Claims Administration &	4/27/2021	KBD	390	0.2 Exchange correspondence regarding communication with claimants (.2) 0.1 telephone conference with J. Wine regarding preparation for call with claimants' counsel (.1)	\$ \$	39.00
·	Objections Claims Administration &	4/29/2021	KBD	390	0.4 Study correspondence and documents from claimants' counsel and J. Wine regarding request for claims and	\$	156.00
·	Objections Claims Administration &	4/29/2021	KBD	390	other documentation (.4) 0.2 telephone conference with J. Wine regarding claimants' request for claims and other documentation (.2)	\$	78.00
	Objections Claims Administration &	4/29/2021	KBD	390	0.5 telephone conference with claimants' counsel and J. Wine regarding request for claims and other	\$	195.00
April-21	Objections Claims Administration &	4/30/2021	KBD	390	documentation (.5) 0.2 Study information and correspondence regarding claims (.2)	\$	78.00
April-21	Objections Claims Administration &	4/30/2021	KBD	390	0.5 study document vendor master service agreement and draft related correspondence to J. Wine (.5).	\$	195.00
	Objections Business Operations Claims Administration &	4/12/2021 4/1/2021	AW JRW	140 260	0.2 email exchanges regarding access to email accounts and saved emails (.2).0.2 Correspondence with J. Rak and K. Duff regarding vendor software (.2)	\$ \$	28.00 52.00
April-21	Objections Claims Administration &	4/1/2021	JRW	260	1 study revised vendor contract and license agreement and related revisions and comments to counsel for	\$	260.00
April-21	Objections Claims Administration & Objections	4/1/2021	JRW	260	claimants (1.0) 0.6 review and organize emails in receiver's account, and prepare responses to claimant emails (.6)	\$	156.00
April-21	Claims Administration & Objections	4/1/2021	JRW	260	0.6 telephone conference with claimants' counsel and K. Duff regarding records subpoena and motion (.6).	\$	156.00
April-21	Claims Administration & Objections	4/1/2021	MR	390	0.1 Attention to claims related matters (.1)	\$	39.00
April-21	Claims Administration & Objections	4/1/2021	MR	390	0.5 attention to issues regarding claimant discovery (.5)	\$	195.00
·	Claims Administration & Objections	4/1/2021	MR	390	0.3 follow up with K. Duff regarding claimant's request for records (.3).	\$	117.00
	Claims Administration & Objections	4/2/2021	JRW	260	0.1 exchange correspondence with vendor regarding status of claims distribution project (.1)	\$	26.00
·	Claims Administration & Objections	4/2/2021	JRW	260	0.2 review vendor invoice and related email exchange with K. Duff (.2).	\$	52.00
·	Claims Administration & Objections Claims Administration &	4/3/2021 4/5/2021	JRW AW	260 140	Review updated vendor agreement and related correspondence to K. Duff. The second s	\$	52.00 14.00
·	Objections Claims Administration &	4/5/2021	AW	140	U.1 Email exchange with J. Wine and J. Rak regarding contact emails for claimants and review project (.1) O.1 review email exchange relating to distribution to IRA and other custodial claimants and related follow up with J.	·	14.00
·	Objections Claims Administration & Objections	4/5/2021	AW	140	Wine (.1) 0.3 review email files and email communications with K. Duff and J. Wine regarding processing of emails (.3).	\$	42.00

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
	Claims Administration &	4/5/2021	JR	on 140	0.2 Review email from J. Wine and A. Watychowicz and provide requested claimant information (.2)	\$	28.00
April-21 (Objections Claims Administration & Objections	4/5/2021	JRW	260	0.1 Correspondence with J. Rak and K. Duff regarding EquityBuild documents (.1)	\$	26.00
April-21 (Claims Administration & Objections	4/5/2021	JRW	260	0.1 confer with A. Watychowicz regarding updates required to claimant contact list (.1)	\$	26.00
April-21 (Claims Administration & Objections	4/5/2021	JRW	260	0.3 correspondence with K. Duff regarding revised vendor agreement and related revisions to claimants' counsel (.3)	\$	78.00
April-21 (Claims Administration & Objections	4/5/2021	JRW	260	0.1 review research regarding distributions (.1)	\$	26.00
. (Claims Administration & Objections	4/5/2021	JRW	260	0.2 exchange correspondence with K. Duff and claims vendor regarding invoice and breakdown of fees (.2)	\$	52.00
. (Claims Administration & Objections	4/5/2021	JRW	260	0.3 additional correspondence with claimants' counsel and K. Duff regarding revisions to vendor agreement (.3)	\$	78.00
. (Claims Administration & Objections	4/5/2021	JRW	260	0.5 correspondence with claimant's counsel regarding distribution of claims forms and related review of records (.5)	\$	130.00
. (Claims Administration & Objections Claims Administration &	4/5/2021 4/5/2021	JRW MR	260 390	0.2 correspondence with claimants' counsel regarding counsel of record and distribution of claim forms and related exchange with J. Rak regarding updating records (.2).0.2 Attention to emails on claims process related issues.	\$ \$	52.00 78.00
. (Objections Claims Administration &	4/6/2021	JRW	260	0.1 Exchange correspondence with claimants' counsel regarding properties (.1)	\$	26.00
. (Objections Claims Administration &	4/6/2021	JRW	260	0.2 email exchange with counsel for claimants regarding counsel of record for service (.2).	\$	52.00
. (Objections Claims Administration &	4/6/2021	MR	390	0.2 Attention to inquiry from claimant's counsel and follow up with E. Duff regarding same.	\$	78.00
April-21 (Objections Claims Administration &	4/7/2021	JR	140	0.4 Review emails from J. Wine pertaining to lender counsel email contact list update and update same.	\$	56.00
April-21 (Objections Claims Administration &	4/7/2021	JRW	260	0.1 exchange correspondence with vendor and claimant's counsel regarding vendor agreement (.1)	\$	26.00
April-21 (Objections Claims Administration &	4/8/2021	AW	140	0.1 communicate with IT consultant regarding archive notices relating to EquityBuild emails and group issue (.1)	\$	14.00
April-21 (Objections Claims Administration & Objections	4/8/2021	AW	140	0.1 compile email folders and email K. Duff link containing same (.1).	\$	14.00
April-21 (Claims Administration & Objections	4/8/2021	JRW	260	0.2 confer with K. Duff regarding status report to court (.2)	\$	52.00
April-21 (Claims Administration & Objections	4/8/2021	JRW	260	0.4 confer with vendor and SEC regarding provision of records (.4)	\$	104.00
	Claims Administration & Objections	4/8/2021	JRW	260	0.3 revise worksheet regarding claims and related correspondence to K. Duff and A. Porter (.3)	\$	78.00
. (Claims Administration & Objections	4/8/2021	JRW	260	0.7 prepare draft of interim status report on claims (.7)	\$	182.00
. (Claims Administration & Objections	4/8/2021	JRW	260	0.1 review revisions to interim report and further revise same (.1).	\$	26.00
. (Claims Administration & Objections	4/8/2021	MR	390	1 Attention to emails and review drafts of claims status report and circulate same to K. Duff and J. Wine.	\$	390.00
. (Claims Administration & Objections Claims Administration &	4/9/2021 4/9/2021	JRW JRW	260 260	Exchange drafts of interim status report on claims with M. Rachlis and K. Duff (1.0) Communications with SEC (.2)	\$ \$	260.00 52.00
. (Objections Claims Administration & Claims Administration &	4/9/2021	JRW	260	0.3 correspondence with counsel for claimants and vendor regarding EquityBuild document project (.3)	\$ \$	78.00
. (Objections Claims Administration &	4/9/2021	JRW	260	1.9 extended conference with A. Porter, M. Rachlis, and K. Duff regarding procedure for addressing recorded liens		494.00
. (Objections Claims Administration &	4/9/2021	JRW	260	against properties (1.9) 0.1 correspondence from claimant's counsel regarding request for information regarding sale of property and	\$	26.00
April-21 (Objections Claims Administration & Objections	4/9/2021	MR	390	related email to A. Porter and K. Duff (.1). 1.9 Meeting on claim related issues with J. Wine, A. Porter and K. Duff (1.9)	\$	741.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 140 of 157 PageID #:65173

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
April-21	Claims Administration & Objections	4/9/2021	MR	on 390	0.3 further review and comment on draft claims status reports and related communications (.3).	\$	117.00
April-21	Claims Administration & Objections	4/12/2021	AW	140	0.3 Review email correspondence relating to transfer of claims' documentation.	\$	42.00
April-21	Claims Administration & Objections	4/12/2021	JRW	260	0.2 Exchange correspondence with vendor regarding claims documentation metrics (.2)	\$	52.00
April-21	Claims Administration & Objections	4/12/2021	JRW	260	0.1 exchange correspondence with vendor regarding property grouping (SSDF1, 4520-26 S Drexel Boulevard) (.1)	\$	26.00
April-21	Claims Administration & Objections	4/12/2021	JRW	260	0.3 review revised vendor agreement and related analysis to K. Duff (.3)	\$	78.00
April-21	Claims Administration & Objections	4/12/2021	JRW	260	0.2 follow-up regarding revised vendor agreement with claimants' counsel (.2)	\$	52.00
April-21	Claims Administration & Objections	4/12/2021	JRW	260	0.2 confer with claimants' counsel regarding EquityBuild documents and commencement of claims process (.2)	\$	52.00
April-21	Claims Administration & Objections	4/12/2021	JRW	260	0.1 email to K. Duff and M. Rachlis regarding EB documents and commencement of claims process (.1)	\$	26.00
April-21	Claims Administration & Objections	4/12/2021	JRW	260	0.5 telephone conference with vendors and claimants' counsel regarding finalization of vendor agreement (.5)	\$	130.00
April-21	Claims Administration & Objections	4/13/2021	AW	140	0.2 Attention to emails from claimants regarding claims process and email approved responses (.2)	\$	28.00
•	Claims Administration & Objections	4/13/2021	AW	140	0.1 attention to voice message from claimant and email J Wine regarding draft response (.1).	\$	14.00
·	Claims Administration & Objections	4/13/2021	JRW	260	0.3 Exchange correspondence with claimants' counsel and vendor regarding EquityBuild documents and finalization of agreement (.3)	\$	78.00
·	Claims Administration & Objections	4/13/2021	JRW	260	0.2 revisions to joint status report and related correspondence with K. Duff (.2)	\$	52.00
·	Claims Administration & Objections	4/14/2021	JRW	260	0.8 multiple correspondence with vendor and claimants' counsel regarding revisions to vendor agreement and procedures (.8)	\$	208.00
·	Claims Administration & Objections	4/14/2021	JRW	260	0.2 email to SEC (.2)	\$	52.00
·	Claims Administration & Objections	4/14/2021	JRW	260	0.8 telephone conference with SEC and K. Duff (.8)	\$	208.00
April-21	Claims Administration & Objections	4/14/2021	JRW	260	0.7 work with K. Duff on revisions to joint status report and related email to counsel for claimants and SEC (.7)	\$	182.00
·	Claims Administration & Objections	4/14/2021	JRW	260	0.4 confer with vendor and K. Pritchard regarding hard drive of EquityBuild documents (.4)	\$	104.00
·	Claims Administration & Objections	4/15/2021	AW	140	0.4 Attention to emails from claimants requesting status updates and additional information regarding claims process and respond to same (.4)	\$	56.00
•	Claims Administration & Objections	4/15/2021	AW	140	0.2 attention to emails requesting contact info update and process same (.2).	\$	28.00
•	Claims Administration & Objections	4/15/2021	JRW	260	0.5 prepare list regarding same for claimants' counsel (.5)	\$	130.00
·	Claims Administration & Objections	4/15/2021	JRW	260	0.1 related email exchange with claimants counsel (.1)	\$	26.00
·	Claims Administration & Objections	4/15/2021	JRW	260	1.2 attention to joint status report on commencement of claims process and several exchanges of revisions and comments with K. Duff, SEC, and claimants' counsel (1.2)	\$	312.00
·	Claims Administration & Objections	4/15/2021	MR	390	0.4 Attention to emails on joint status and claims.	\$	156.00
April-21	Claims Administration & Objections	4/16/2021	AW	140	2.3 Review emails from claimants regarding received documents and questions about claims process, brief communications with J. Wine regarding same, research answers to frequently asked questions, and send out email responses (2.3)	\$	322.00
April-21	Claims Administration & Objections	4/16/2021	AW	140	0.1 respond to follow up emails from same claimants (.1)	\$	14.00
•	Claims Administration & Objections	4/16/2021	AW	140	0.1 email exchange with J. Wine regarding change of format of exhibit for claimants (.1)	\$	14.00
April-21	Claims Administration & Objections	4/16/2021	AW	140	0.1 confer with J. Wine regarding joint status report and brief review of same (.1).	\$	14.00

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Ob	jection
	Keeper	Rate	Hours	Descripti on	Cost		
•	Claims Administration & Objections	4/16/2021	JRW	260	1.8 Continued preparation of joint status report and related exchanges with SEC and claimants' counsel, conferences with K. Duff and M. Rachlis, and revisions to same (1.8)	\$	468.00
April-21 C	Claims Administration & Objections	4/16/2021	JRW	260	0.4 email exchange and telephone conference with vendor regarding data inventory, third-party software and passwords (.4).	\$	104.00
•	Claims Administration & Objections	4/16/2021	KMP	140	0.3 Review and revise draft joint status report and related communications with K. Duff and J. Wine.	\$	42.00
	Claims Administration & Objections	4/16/2021	MR	390	0.5 Attention to joint status report and related issues (.5)	\$	195.00
April-21 C	Claims Administration & Objections	4/16/2021	MR	390	0.5 attention to follow up regarding claimant's properties and related issues (.5).	\$	195.00
	Claims Administration & Objections	4/17/2021	JRW	260	0.2 Review revised draft of joint status report and related email exchange with K. Duff.	\$	52.00
April-21 C	Claims Administration & Objections	4/19/2021	AW	140	0.3 Prepare packet regarding claimant and email K. Duff (.3)	\$	42.00
April-21 C	Claims Administration & Objections	4/19/2021	AW	140	1.8 review emails from claimants regarding received documents and requests for update, communicate with K. Duff regarding appropriate responses, and send out email responses (1.8)	\$	252.00
	Claims Administration & Objections	4/19/2021	JRW	260	0.1 review correspondence from vendor and A. Watychowicz regarding EB records (.1).	\$	26.00
April-21 C	Claims Administration & Objections	4/19/2021	KMP	140	0.6 Review, revise, finalize, and file joint status report (.6)	\$	84.00
April-21 C	Claims Administration & Objections	4/19/2021	KMP	140	0.3 communications with K. Duff and A. Watychowicz regarding joint status report (.3).	\$	42.00
April-21 C	Claims Administration & Objections	4/20/2021	AW	140	0.7 Review emails from claimants regarding received documents and requests for update and send out email responses (.7)	\$	98.00
April-21 C	Claims Administration & Objections	4/20/2021	AW	140	0.1 communicate with K. Duff regarding unique questions from claimants (.1)	\$	14.00
April-21 C	Claims Administration & Objections	4/20/2021	AW	140	0.3 prepare revised claims sheet and email J. Wine regarding same (.3).	\$	42.00
April-21 C	Claims Administration & Objections	4/20/2021	AW	140	0.2 Research and communicate with K. Duff regarding software syncing options (.2)	\$	28.00
April-21 C	Claims Administration & Objections	4/20/2021	AW	140	0.1 review file preserved by IT consultant and detailed email regarding file types (.1).	\$	14.00
April-21 C	Claims Administration & Objections	4/20/2021	MR	390	0.3 Attention to draft joint status report.	\$	117.00
•	Claims Administration & Objections	4/21/2021	AW	140	0.4 Finalize master claims list by property number (.4)	\$	56.00
	Claims Administration & Objections	4/21/2021	AW	140	0.2 research regarding claims and related email follow up with J. Wine (.2)	\$	28.00
•	Claims Administration & Objections	4/21/2021	AW	140	0.2 update claimant's information and email him requested update (.2)	\$	28.00
	Claims Administration & Objections	4/22/2021	AW	140	0.3 Research claim emails regarding frequently asked questions, attention to email from claimant regarding fees, work on and respond to claimant (.3)	\$	42.00
April-21 C	Claims Administration & Objections	4/22/2021	AW	140	0.2 update claimant's information and email requested update (.2)	\$	28.00
April-21 C	Claims Administration & Objections	4/23/2021	AW	140	0.1 Email exchange with J. Wine regarding status of claims emails (.1)	\$	14.00
April-21 C	Claims Administration & Objections	4/23/2021	AW	140	0.1 draft and communicate with J. Wine regarding proposed response to claimant (.1)	\$	14.00
April-21 C	Claims Administration & Objections	4/23/2021	AW	140	0.1 respond to claimant's request for pleadings (.1).	\$	14.00
April-21 C	Claims Administration & Objections	4/23/2021	JRW	260	0.1 Confer with A. Watychowicz regarding updates to master claims list (.1)	\$	26.00
April-21 C	Claims Administration & Objections	4/23/2021	JRW	260	0.1 exchange correspondence with vendor regarding claims distribution project (.1).	\$	26.00
April-21 C	Claims Administration & Objections	4/26/2021	AW	140	0.3 attention to emails from claimants regarding claims files and requests for updates and respond to same (.3)	\$	42.00
April-21 C	Claims Administration & Objections	4/26/2021	AW	140	0.2 communicate with J. Wine regarding proposed responses to claimants and email responses to claimants (.2).	\$	28.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 142 of 157 PageID #:65175

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	ojection
	Claims Administration & Objections	4/26/2021	JR	on 140	1.1 update property list with institutional lender claims (1.1).	\$	154.00
April-21 C	Claims Administration & Objections	4/26/2021	JRW	260	0.5 confer with A. Watychowicz regarding updating claims records (.5)	\$	130.00
April-21 C	Claims Administration & Objections	4/26/2021	JRW	260	0.9 study draft motion and subpoena and related analysis to K. Duff (1017 W 102nd Street, 8403 S Aberdeen Street, 8432 S Essex Avenue, 9212 S Parnell Avenue, 8346 S Constance Avenue, 8107 S Kingston Avenue) (.9)	\$	234.00
·	Claims Administration & Objections	4/26/2021	JRW	260	0.2 correspondence with vendor and claimants' counsel regarding EB documents project (.2).	\$	52.00
April-21 C	Claims Administration & Objections	4/27/2021	AW	140	0.2 Update claimant's contact information and add claim to properties mail list (.2)	\$	28.00
April-21 C	Claims Administration & Objections	4/27/2021	AW	140	0.1 respond to claimant regarding mailing address concern on submitted proofs of claim forms (.1)	\$	14.00
April-21 C	Claims Administration & Objections	4/27/2021	AW	140	0.4 updates to master claims list and related email to J. Wine (.4).	\$	56.00
April-21 C	Claims Administration & Objections	4/27/2021	JRW	260	0.1 Confer with A. Watychowicz regarding potential modification of master claims list (.1)	\$	26.00
April-21 C	Claims Administration & Objections	4/28/2021	AW	140	0.1 Communicate with J. Wine regarding possible amendment of claim (.1)	\$	14.00
April-21 C	Claims Administration & Objections	4/28/2021	AW	140	0.1 review claim and respond to claimant's inquiry regarding resolution of claims against funds (.1)	\$	14.00
	Claims Administration & Objections	4/28/2021	AW	140	0.1 attention to email exchange regarding claims against funds and claims list (.1)	\$	14.00
April-21 C	Claims Administration & Objections	4/28/2021	AW	140	0.2 research regarding response to claimants' request for records and related email exchanges with J. Wine (.2)	\$	28.00
April-21 C	Claims Administration & Objections	4/28/2021	AW	140	0.2 review sample documents preserved from online platform and email them to K. Duff and J. Wine with summary of relationship with online vendor (.2).	\$	28.00
·	Claims Administration & Objections	4/28/2021	JRW	260	0.9 Exchange correspondence with claimants' counsel regarding EquityBuild records and various related discussions with K. Duff, M. Rachlis and A. Watychowicz (.9)	\$	234.00
·	Claims Administration & Objections	4/28/2021	JRW	260	0.2 telephone conference with K. Duff and email exchange with A. Watychowicz in preparation for call with claimants' counsel regarding request for EB records (.2).	\$	52.00
·	Claims Administration & Objections	4/28/2021	MR	390	0.5 Attention to various issues regarding claims documents library.	\$	195.00
April-21 C	Claims Administration & Objections	4/29/2021	AW	140	0.1 Attention to email from claimant regarding served documents and respond to same (.1)	\$	14.00
	Claims Administration & Objections	4/29/2021	AW	140	0.2 call with J. Wine regarding claims issues (.2)	\$	28.00
·	Claims Administration & Objections	4/29/2021	AW	140	0.1 follow up with J. Wine regarding objection to claimants' request for records (.1).	\$	14.00
April-21 C	Claims Administration & Objections	4/29/2021	JRW	260	0.5 Study proposed motion for leave to file subpoena and draft subpoena in preparation for conference with counsel (.5)	\$	130.00
April-21 C	Claims Administration & Objections	4/29/2021	JRW	260	0.2 telephone conference with K. Duff regarding subpoena (.2)	\$	52.00
April-21 C	Claims Administration & Objections	4/29/2021	JRW	260	0.5 telephone conference with claimants' counsel and K. Duff regarding draft motion and proposed subpoena (.5)	\$	130.00
April-21 C	Claims Administration & Objections	4/29/2021	JRW	260	0.2 exchange correspondence with claimants' counsel regarding recovery of EB documents and samples of TMO documents (.2)	\$	52.00
April-21 C	Claims Administration & Objections	4/29/2021	JRW	260	0.4 telephone conference with K. Duff regarding discovery (.4)	\$	104.00
April-21 C	Claims Administration & Objections	4/29/2021	JRW	260	0.3 prepare chart regarding discovery (.3)	\$	78.00
April-21 C	Claims Administration & Objections	4/30/2021	AW	140	0.1 Call with J. Wine regarding revisions to master claims list (.1)	\$	14.00
April-21 C	Claims Administration & Objections	4/30/2021	AW	140	1.1 review and revise claims (1.1)	\$	154.00
April-21 C	Claims Administration & Objections	4/30/2021	AW	140	0.3 prepare revisions sheet for vendors (.3).	\$	42.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 143 of 157 PageID #:65176

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
	Claims Administration & Objections	4/30/2021	JRW	on 260	0.2 Confer with A. Watychowicz regarding claims submitted by City (.2)	\$	52.00
April-21	Claims Administration & Objections	4/30/2021	JRW	260	0.6 multiple email exchanges with vendor and claimants' counsel regarding vendor licenses and payments (.6)	\$	156.00
April-21	Claims Administration & Objections	4/30/2021	JRW	260	0.2 confer with K. Duff regarding proposed contract (.2)	\$	52.00
May-21 (Claims Administration & Objections	5/3/2021	KBD	390	0.4 Exchange correspondence and telephone conference with J. Wine regarding efforts to retrieve records from EquityBuild vendors, service agreements, and cost (.4)	\$	156.00
May-21 (Claims Administration & Objections	5/3/2021	KBD	390	0.5 work on responses claimants' communications relating to claims issues (.5)	\$	195.00
May-21 (Claims Administration & Objections	5/3/2021	KBD	390	0.2 exchange correspondence with A. Porter regarding analysis of issue relating to claimants' claims (.2).	\$	78.00
May-21 (Claims Administration & Objections	5/5/2021	KBD	390	0.3 Work on document vendor expense and service agreement issues.	\$	117.00
May-21 (Claims Administration & Objections	5/6/2021	KBD	390	0.2 attention to claimant communication issue (.2).	\$	78.00
May-21 (Claims Administration & Objections	5/10/2021	KBD	390	0.2 review information and correspondence from claimants (.2).	\$	78.00
May-21 (Claims Administration & Objections	5/13/2021	KBD	390	0.4 work on communication with claimants relating to claims process (.4).	\$	156.00
May-21 (Claims Administration & Objections	5/17/2021	KBD	390	0.2 Exchange correspondence regarding potential claimants regarding potential claim and communications (.2)	\$	78.00
May-21 (Claims Administration & Objections	5/17/2021	KBD	390	0.2 communicate with vendor and A. Watychowicz regarding access to claims EB documents (.2)	\$	78.00
May-21 (Claims Administration & Objections	5/17/2021	KBD	390	0.4 study draft joint status report and related correspondence (.4)	\$	156.00
May-21 (Claims Administration & Objections	5/17/2021	KBD	390	0.7 telephone conference with and draft correspondence to M. Rachlis and J. Wine regarding joint status report (.7)	\$	273.00
May-21 (Claims Administration & Objections	5/17/2021	KBD	390	0.1 exchange correspondence with A. Watychowicz regarding communications with claimants relating to claims process (.1)	\$	39.00
May-21 (Claims Administration & Objections	5/17/2021	KBD	390	0.1 review vendor invoice and exchange related correspondence with J. Wine (.1).	\$	39.00
May-21 (Claims Administration & Objections	5/18/2021	KBD	390	1.5 Study and revise joint status report, review other revisions, and exchange various related correspondence with J. Wine and M. Rachlis (1.5)	\$	585.00
May-21 (Claims Administration & Objections	5/18/2021	KBD	390	0.2 telephone conference and exchange correspondence with SEC (.2)	\$	78.00
May-21 (Claims Administration & Objections	5/18/2021	KBD	390	0.2 work on communications with claimants regarding claims process (.2)	\$	78.00
May-21 (Claims Administration & Objections	5/18/2021	KBD	390	0.3 attention to claims vendor progress invoice issues and exchange correspondence with J. Wine regarding same (.3).	\$	117.00
May-21 (Claims Administration & Objections	5/19/2021	KBD	390	0.2 Work on communications with claimants (.2)	\$	78.00
May-21 (Claims Administration & Objections	5/20/2021	KBD	390	0.3 Work on response to claimant regarding claim process and legal representation (.3)	\$	117.00
May-21 (Claims Administration & Objections	5/26/2021	KBD	390	0.4 Work on document culling issues and exchange correspondence with J. Wine and A. Watychowicz regarding vendor reports and various related issues.	\$	156.00

Entry Date Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ol	ojection
May-21 Business Operations	5/11/2021	ED	on 390	0.3 Email correspondence with insurance agent and with accountants regarding premium payments and refunds relating to certain properties sold in 2020 (7836 South Shore Drive, 7201 S Constance Avenue, 4533-47 S Calumet Avenue, 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, 9610 S Woodlawn Avenue, 7300-04 St Lawrence Avenue, 7760 S Coles Avenue, 1401 W 109th Place, 310 E 50th Street, 6807 S Indiana Avenue, 8000-02 S Justine Street, 8107-09 S Ellis Avenue, 8209 S Ellis Avenue, 8214-16 S Ingleside Avenue, 6217-27 S Dorchester Avenue, 4520-26 S Drexel Boulevard, 4611-17 S Drexel Avenue, 7110 S Cornell Avenue, 6250 S Mozart Street, 6749-59 S Merrill Avenue, 7255-57 S Euclid Avenue, 7109-19 S Calumet Avenue, 6355-59 S Talman Avenue, 7201-07 S Dorchester Avenue, 7600-10 S Kingston Avenue, 7656-58 S Kingston Avenue, 7957-59 S Marquette Road, 8326-32 S Ellis Avenue, 816-22 E Marquette Road, 638-40 N Avers Avenue, 7442-54 S Calumet Avenue, 7749-59 S Yates Boulevard, 1700-08 W Juneway Terrace, 6949-59 S Merrill Avenue, 1422-24 East 68th Street, 2800-06 E 81st Street).	\$	117.00
May-21 Business Operations May-21 Business Operations May-21 Claims Administration &	5/17/2021 5/17/2021 5/2/2021	AW AW JRW	140 140 260	0.3 Research regarding EB email account and communicate with K. Duff regarding results (.3)0.2 research regarding process service and communicate with J. Wine regarding same (.2).0.3 Study vendor licenses.	\$ \$ \$	42.00 28.00 78.00
Objections May-21 Claims Administration & Objections	5/3/2021	AW	140	1.8 Attention to emails from claimants regarding corrections to their claims and update requests, review claims, correspond with J. Wine regarding responses, and respond to claimants' requests (1.8)	\$	252.00
May-21 Claims Administration & Objections	5/3/2021	JRW	260		\$	156.00
May-21 Claims Administration & Objections	5/3/2021	JRW	260	0.4 telephone conference with vendor and related correspondence to its general counsel regarding software license agreement (.4)	\$	104.00
May-21 Claims Administration & Objections	5/3/2021	JRW	260	0.4 correspondence with vendors and claimants' counsel regarding vendor licenses and quotes (.4).	\$	104.00
May-21 Claims Administration & Objections	5/4/2021	AW	140	0.1 Follow up with J. Wine regarding suggested response to claimant, revise his claim, and send email response (.1)	\$	14.00
May-21 Claims Administration & Objections	5/4/2021	AW	140	0.2 attention to invoice from claimant, review claim, and email exchange with J. Wine regarding proposed revisions to claim (.2)	\$	28.00
May-21 Claims Administration & Objections	5/4/2021	AW	140	0.3 respond to update requests from claimants (.3).	\$	42.00
May-21 Claims Administration & Objections	5/4/2021	JRW	260	0.1 Confer with A. Watychowicz regarding updating claim (.1)	\$	26.00
May-21 Claims Administration & Objections	5/5/2021	AW	140	0.1 Email regarding claimants' specific questions and group email (.1)	\$	14.00
May-21 Claims Administration & Objections	5/5/2021	AW	140	0.3 research regarding claim and email claims vendor regarding claim form file (.3)	\$	42.00
May-21 Claims Administration & Objections	5/5/2021	AW	140	0.1 attention to string emails about online vendor and email response to K. Duff and J. Wine (.1).	\$	14.00
May-21 Claims Administration &	5/5/2021	JRW	260	0.1 Telephone conference with K. Duff regarding documents in control of third party (.1)	\$	26.00
Objections May-21 Claims Administration & Objections	5/5/2021	JRW	260	0.3 email exchange with counsel for claimants regarding vendor contract (.3)	\$	78.00
May-21 Claims Administration &	5/5/2021	JRW	260	0.2 email to general counsel for vendor regarding proposed agreement (.2)	\$	52.00
Objections May-21 Claims Administration &	5/5/2021	JRW	260	0.5 multiple telephone conferences with vendor's counsel regarding EquityBuild documents (.5)	\$	130.00
Objections May-21 Claims Administration & Objections	5/5/2021	JRW	260	0.3 confer with vendors regarding software requirements (.3)	\$	78.00

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Ob	jection
	Keeper	Rate	Hours	Descripti on	Cost		
	Claims Administration & Objections	5/5/2021	JRW	260	0.2 email to claimants' counsel and vendor regarding access to documents in control of third-party (.2).	\$	52.00
May-21	Claims Administration & Objections	5/6/2021	AW	140	0.2 Call with J. Wine regarding online software and access issues (.2)	\$	28.00
May-21	Claims Administration & Objections	5/6/2021	JRW	260	0.6 Various email exchanges with claimants' counsel and vendors regarding obtaining access to EquityBuild documents in control of third parties and production format (.6)	\$	156.00
May-21	Claims Administration & Objections	5/6/2021	JRW	260	0.1 telephone conference with A. Watychowicz regarding same (.1)	\$	26.00
May-21	Claims Administration & Objections	5/6/2021	JRW	260	0.5 email exchanges with vendor and K. Duff regarding revision and execution of license agreement and review same (.5)	\$	130.00
May-21	Claims Administration & Objections	5/6/2021	JRW	260	0.1 review inquiries from claimant and prior responses of Receiver (.1).	\$	26.00
May-21	Claims Administration & Objections	5/7/2021	AW	140	0.1 Attention to emails from online vendor regarding requested assistance (.1)	\$	14.00
May-21	Claims Administration & Objections	5/7/2021	AW	140	0.1 attention to email from claimant regarding update and communicate with K. Duff regarding same (.1).	\$	14.00
May-21	Claims Administration & Objections	5/10/2021	AW	140	0.1 Research and email K. Duff regarding proposed discovery requests (.1)	\$	14.00
May-21	Claims Administration & Objections	5/10/2021	AW	140	0.2 review transcript of proceedings regarding discovery requests approval and email K. Duff same along with claims process orders (.2)	\$	28.00
May-21	Claims Administration & Objections	5/10/2021	AW	140	0.1 follow up on responses to claimants (.1).	\$	14.00
May-21	Claims Administration & Objections	5/10/2021	JRW	260	0.1 email exchange with vendor and claimant's counsel regarding payment of invoice (.1)	\$	26.00
May-21	Claims Administration & Objections	5/11/2021	AW	140	0.1 Email exchanges with J. Wine regarding draft response to claimant (.1)	\$	14.00
May-21	Claims Administration & Objections	5/11/2021	AW	140	0.2 email responses to claimants (.2).	\$	28.00
May-21	Claims Administration & Objections	5/11/2021	JRW	260	0.2 review claim forms and related correspondence with A. Watychowicz (.2)	\$	52.00
May-21	Claims Administration & Objections	5/11/2021	JRW	260	0.3 exchange correspondence with vendor and claimants' counsel regarding EquityBuild documents project (.3)	\$	78.00
May-21	Claims Administration & Objections	5/11/2021	KMP	140	0.2 Attention to communications with claimants' counsel regarding costs associated with upgrading software program in connection with claims reporting.	\$	28.00
May-21	Claims Administration & Objections	5/13/2021	AW	140	0.8 Review claims and work on responses to claimants (.8)	\$	112.00
May-21	Claims Administration & Objections	5/13/2021	AW	140	0.1 respond to claimants' emails (.1).	\$	14.00
May-21	Claims Administration & Objections	5/13/2021	JRW	260	0.3 confer with A. Watychowicz regarding claims review chart and add links in Dropbox to same (.3)	\$	78.00
May-21	Claims Administration & Objections	5/13/2021	JRW	260	0.4 review invoice from vendor and related analysis to K. Duff and email exchange with claimants' counsel and telephone conference with vendor (.4).	\$	104.00
May-21	Claims Administration & Objections	5/14/2021	AW	140	0.1 Attention to emails from online vendor and forward same to claims vendor (.1)	\$	14.00
May-21	Claims Administration & Objections	5/14/2021	AW	140	0.1 respond to claimants' emails (.1).	\$	14.00
May-21	Claims Administration & Objections	5/14/2021	JRW	260	0.2 exchange correspondence with K. Duff, counsel for claimants and SEC regarding preparation of joint status report on EquityBuild documents (.2).	\$	52.00
May-21	Claims Administration & Objections	5/17/2021	JRW	260	0.2 review documents in preparation for conference call with document vendor (.2)	\$	52.00
May-21	Claims Administration & Objections	5/17/2021	JRW	260	0.3 prepare property listing and related correspondence with claims vendor (.3)	\$	78.00
May-21	Claims Administration & Objections	5/17/2021	JRW	260	0.7 review and revise joint status report regarding commencement of claims process and related internal and external correspondence (.7)	\$	182.00
May-21	Claims Administration & Objections	5/17/2021	JRW	260	0.1 exchange correspondence with claims vendor regarding invoice (.1)	\$	26.00
May-21	Claims Administration & Objections	5/17/2021	JRW	260	0.3 conference call with K. Duff and M. Rachlis regarding status report and claims process (.3).	\$	78.00

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
May-21	Claims Administration &	5/17/2021	MR	on 390	0.4 Work on joint status report (.4)	\$	156.00
May-21	Objections Claims Administration & Objections	5/17/2021	MR	390	0.3 conferences with K. Duff and J. Wine regarding joint status report (.3).	\$	117.00
May-21	Claims Administration & Objections	5/18/2021	AW	140	0.4 Review claims and draft email responses to claimants (.4)	\$	56.00
May-21	Claims Administration & Objections	5/18/2021	AW	140	0.2 send email responses to claimants (.2).	\$	28.00
May-21	Claims Administration & Objections	5/18/2021	JRW	260	1.3 Correspondence with counsel for claimants, M. Rachlis and K. Duff regarding Joint Status Report and related revision of same (1.3)	\$	338.00
May-21	Claims Administration & Objections	5/18/2021	JRW	260	0.1 email exchange with vendor regarding status of EquityBuild document loading (.1)	\$	26.00
May-21	Claims Administration & Objections	5/18/2021	JRW	260	0.3 exchange correspondence with K. Duff EquityBuild documents (.3).	\$	78.00
May-21	Claims Administration & Objections	5/18/2021	MR	390	0.7 Further work on draft joint status report.	\$	273.00
May-21	Claims Administration & Objections	5/19/2021	AW	140	0.1 Respond to claimant's email (.1)	\$	14.00
May-21	Claims Administration & Objections	5/19/2021	AW	140	0.3 communicate with K. Duff and J Wine regarding emails from claimants (.3).	\$	42.00
•	Claims Administration & Objections	5/19/2021	JRW	260	0.2 Exchange correspondence with vendor regarding claims distribution project (.2)	\$	52.00
	Claims Administration & Objections	5/19/2021	JRW	260	0.1 exchange correspondence with K. Duff and K. Pritchard regarding joint status report (.1)	\$	26.00
,	Claims Administration & Objections	5/19/2021	JRW	260	0.5 review sample reports from vendor and related correspondence with K. Duff (.5)	\$	130.00
•	Claims Administration & Objections	5/19/2021	JRW	260	0.1 review court order relating to joint status report (.1).	\$	26.00
•	Claims Administration & Objections	5/20/2021	JRW	260	0.2 exchange correspondence with vendor and claimants' counsel regarding EquityBuild document project (.2).	\$	52.00
•	Claims Administration & Objections	5/21/2021	AW	140	0.1 Respond to claimant's email (.1)	\$	14.00
	Claims Administration & Objections	5/21/2021	JRW	260	0.2 Correspondence with claimants' counsel regarding EquityBuild document culling (.2)	\$	52.00
•	Claims Administration & Objections	5/21/2021	JRW	260	0.6 review correspondence and sample reports from vendor, related telephone conference with vendor and emails regarding scheduling meeting (.6)		156.00
•	Claims Administration & Objections	5/24/2021	AW	140	O.3 Attention to emails from claimants, research regarding same, and email K. Duff and J. Wine regarding responses and prior communications (.3)	\$	42.00
•	Claims Administration & Objections	5/24/2021	AW	140	0.3 email responses to claimants' inquiries (.3)	\$	42.00
,	Claims Administration & Objections	5/24/2021	AW	140	0.2 attention to contact update request, update contact information, and respond to claimant (.2)	\$ \$	28.00
•	Claims Administration & Objections	5/24/2021 5/24/2021	JRW JRW	260 260	0.7 Conference call with vendor and claimants' counsel regarding EquityBuild document project (.7)	\$	182.00 104.00
•	Claims Administration & Objections	5/25/2021	JRW	260	0.4 telephone conference with K. Duff regarding EquityBuild document issues (.4).	\$	260.00
•	Claims Administration & Objections Claims Administration &	5/25/2021	JRW	260	Prepare for and participate in conference call with claims vendors regarding EquityBuild documents (1.0) O.1 related telephone conference with A. Watychowicz regarding EquityBuild documents (.1)	\$ \$	26.00
•	Objections Claims Administration &	5/26/2021	AW	140	0.1 email J. Wine and K. Duff regarding scheduled training (.1).	\$	14.00
•	Objections Claims Administration &	5/26/2021	JRW	260	O.1 Confer with A. Watychowicz regarding court's order (.1)	\$ \$	26.00
	Objections Claims Administration &	5/26/2021	JRW	260	O.1 correspondence with claimants' counsel and vendor regarding EquityBuild document culling (.1)	э \$	26.00
	Objections Claims Administration &	5/26/2021	JRW	260	1.2 study sender domain and file type summary reports from vendor and related analysis to and exchange	\$	312.00
	Objections				correspondence with K. Duff and A. Watychowicz (1.2).		

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Obj	jection
				on			
May-21	Claims Administration & Objections	5/27/2021	AW	140	0.1 Follow up with J. Wine regarding responses to claimants (.1)	\$	14.00
May-21	Claims Administration & Objections	5/27/2021	JRW	260	0.2 Email exchange regarding EquityBuild documents (.2)	\$	52.00
May-21	Claims Administration & Objections	5/27/2021	JRW	260	0.2 review activity log from third-party vendor and related exchange of correspondence with counsel for claimants and vendor (.2).	\$	52.00
May-21	Claims Administration & Objections	5/28/2021	AW	140	0.1 Respond to claimant's email regarding properties grouping (.1)	\$	14.00
June-21	Business Operations	6/9/2021	KBD	390	0.1 Work with J. Wine on response to vendor expense and service issue (.1)	\$	39.00
June-21	Business Operations	6/24/2021	KBD	390	0.2 exchange correspondence with J. Wine regarding service of City notices (.2).	\$	78.00
June-21	Claims Administration & Objections	6/1/2021	KBD	390	0.1 attention to claimant communication relating claim reporting (.1)	\$	39.00
June-21	Claims Administration & Objections	6/1/2021	KBD	390	0.1 work on communication with claimants regarding claims documentation (.1)	\$	39.00
June-21	Claims Administration & Objections	6/2/2021	KBD	390	0.2 attention to claims documentation vendor invoice and exchange related correspondence with J. Wine (.2).	\$	78.00
June-21	Claims Administration & Objections	6/3/2021	KBD	390	0.2 attention to payment of claims vendor invoice (.2).	\$	78.00
June-21	Claims Administration & Objections	6/14/2021	KBD	390	0.2 Exchange correspondence regarding communication with claimant regarding issue involving other claimants (.2)	\$	78.00
June-21	Claims Administration & Objections	6/16/2021	KBD	390	0.3 Study draft joint status report, related correspondence, and revision to same.	\$	117.00
June-21	Claims Administration & Objections	6/17/2021	KBD	390	0.5 Confer with M. Rachlis and J. Wine regarding claimants request for EB records (.5)	\$	195.00
June-21	Claims Administration & Objections	6/17/2021	KBD	390	0.3 telephone conference with counsel for claimants regarding subpoena for EB records (.3)	\$	117.00
June-21	Claims Administration & Objections	6/17/2021	KBD	390	0.4 study correspondence regarding joint status report and potential third party discovery and related conference with M. Rachlis and J. Wine (.4).	\$	156.00
June-21	Claims Administration & Objections	6/22/2021	KBD	390	Study and revise document relating to claimants' request for records and exchange related correspondence with J. Wine (.5)	\$	195.00
June-21	Claims Administration & Objections	6/23/2021	KBD	390		\$	156.00
June-21	Claims Administration & Objections	6/25/2021	KBD	390	0.3 exchange correspondence with J. Wine regarding claimants' request for records (.3)	\$	117.00
June-21	Claims Administration & Objections	6/25/2021	KBD	390	0.1 attention to communication from claimant regarding claims process (.1)	\$	39.00
June-21	Claims Administration & Objections	6/28/2021	KBD	390	0.2 Exchange correspondence regarding production of documents and protective order issue (.2)	\$	78.00
June-21	Claims Administration & Objections	6/28/2021	KBD	390	0.4 work on framing report and related communication and exhibits (.4).	\$	156.00
June-21	Claims Administration & Objections	6/29/2021	KBD	390	0.4 work on responses to claimant communications relating to claims process (.4)	\$	156.00
June-21	Claims Administration & Objections	6/30/2021	KBD	390	0.2 Work on communications with claimants regarding claims process (.2)	\$	78.00
June-21	Business Operations	6/23/2021	JRW	260	0.2 confer with K. Duff and A. Porter regarding approach to handling new notices of code violations regarding sold properties (.2).	\$	52.00
June-21	Business Operations	6/25/2021	JRW	260	0.1 email exchange with K. Duff regarding process for responding to notices of code violations regarding sold properties (.1)	\$	26.00
June-21	Claims Administration & Objections	6/1/2021	AW	140	0.1 Email K. Duff and J. Wine regarding response to follow up from claimants (.1)	\$	14.00
June-21	Claims Administration & Objections	6/1/2021	AW	140	0.1 communicate with J. Wine regarding email from claimant requesting access to claims links (.1)	\$	14.00
June-21	Claims Administration & Objections	6/1/2021	AW	140	0.3 attention to information regarding EquityBuild email records, exchanges with K. Duff and J. Wine regarding same, and reach out to IT vendor regarding expertise (.3)	\$	42.00
June-21	Claims Administration & Objections	6/1/2021	AW	140	0.1 correspond with K. Duff and J. Wine regarding online software and terms of agreement (.1).	\$	14.00
June-21	Claims Administration & Objections	6/1/2021	JRW	260	0.4 confer with A. Watychowicz and K. Duff regarding process for handling claimant requests for files going forward (.4)	\$	104.00

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Obj	jection
June-21	Claims Administration &	6/1/2021	JRW	on 260	0.2 review sample reports from vendor and related correspondence with claimants' counsel (.2)	\$	52.00
June-21	Objections Claims Administration & Objections	6/1/2021	JRW	260	0.2 exchange correspondence with A. Watychowicz and K. Duff regarding invoice (.2).	\$	52.00
June-21	Claims Administration & Objections	6/2/2021	AW	140	0.2 update claimant's contact information and response regarding claims (.2)	\$	28.00
June-21	Claims Administration & Objections	6/2/2021	AW	140	0.1 update to claims sheet (.1).	\$	14.00
June-21	Claims Administration & Objections	6/2/2021	JRW	260	0.2 Exchange emails with claimants' counsel regarding EquityBuild document issues (.2)	\$	52.00
June-21	Claims Administration & Objections	6/2/2021	JRW	260	0.3 review vendor invoice and related analysis to K. Duff (.3)	\$	78.00
June-21	Claims Administration & Objections	6/2/2021	JRW	260	0.7 review reports from vendor and related email to vendor regarding same (.7).	\$	182.00
June-21	Claims Administration & Objections	6/3/2021	AW	140	0.1 Attention to J. Wine's email regarding discovery issues (.1)	\$	14.00
June-21	Claims Administration & Objections	6/3/2021	AW	140	0.6 call with J. Wine regarding discovery issues (.6)	\$	84.00
June-21	Claims Administration & Objections	6/3/2021	AW	140	0.1 review files from online software and communicate with J. Wine regarding acceptable format (.1)	\$	14.00
June-21	Claims Administration & Objections	6/3/2021	AW	140	0.1 communicate with J. Wine regarding framing report and docket deadline for same (.1).	\$	14.00
June-21	1 Claims Administration & Objections	6/3/2021	JRW	260	0.7 Exchange correspondence with vendor regarding format of EquityBuild documents and related review of documents and conference with A. Watychowicz (.7)	\$	182.00
June-21	1 Claims Administration & Objections	6/3/2021	JRW	260	0.6 telephone conference with A. Watychowicz regarding procedures for claims process and discovery (.6)	\$	156.00
June-21	1 Claims Administration & Objections	6/3/2021	JRW	260	0.1 exchange correspondence with claimant's counsel regarding standard discovery (.1).	\$	26.00
June-21	1 Claims Administration & Objections	6/3/2021	KMP	140	0.4 Prepare form for transfer of funds to service provider for work related to claims repository and related communication with provider, K. Duff and bank representative.	\$	56.00
June-21	1 Claims Administration & Objections	6/4/2021	JRW	260	0.1 Exchange emails with claimants' counsel regarding standard discovery requests (.1)	\$	26.00
June-21	1 Claims Administration & Objections	6/4/2021	JRW	260	0.1 confer with A. Watychowicz regarding EquityBuild records (.1)	\$	26.00
June-21	Claims Administration & Objections	6/6/2021	AW	140	0.2 Attention to email from J. Wine regarding review of emails, look up available accounts, and response email regarding same.	\$	28.00
June-21	Claims Administration & Objections	6/8/2021	AW	140	0.1 follow up regarding response to claimant and request for recording of loss (.1)	\$	14.00
June-21	1 Claims Administration & Objections	6/8/2021	AW	140	0.2 attention to invoice from online vendor and increase in price and attention to communication regarding same (.2).	\$	28.00
June-21	1 Claims Administration & Objections	6/8/2021	JRW	260	0.2 Exchange correspondence with K. Duff and vendor regarding software service.	\$	52.00
June-21	1 Claims Administration & Objections	6/9/2021	AW	140	0.3 Work with IT vendor and claims vendor to access updated claims files.	\$	42.00
June-21	1 Claims Administration & Objections	6/9/2021	JRW	260	0.2 telephone conference with claimants' counsel regarding claims documentation and related follow-up with A. Watychowicz (.2)	\$	52.00
June-21	Claims Administration & Objections	6/9/2021	JRW	260	0.1 confer with A. Watychowicz regarding post-receivership email records (.1)	\$	26.00
June-21	1 Claims Administration & Objections	6/9/2021	JRW	260	0.3 correspondence with counsel for claimant regarding former EquityBuild property and related communication with M. Rachlis (.3).	\$	78.00
June-21	1 Claims Administration & Objections	6/9/2021	MR	390	0.2 Follow up on communications regarding claims process with claimant's counsel (.2)	\$	78.00
June-21	Claims Administration & Objections	6/10/2021	AW	140	0.1 Attention to email from claimants' counsel and communicate with J. Wine regarding same (.1)	\$	14.00
June-21	1 Claims Administration & Objections	6/10/2021	AW	140	0.4 communicate with K. Duff regarding response to claimants' counsel regarding contact info and draft email (.4)	\$	56.00
June-21	1 Claims Administration & Objections	6/10/2021	AW	140	0.9 research regarding post receivership email records and detailed related email to J. Wine (.9)	\$	126.00

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Obj	jection
June-21	Claims Administration &	6/10/2021	AW	on 140	0.2 respond to claimants' emails regarding claims issues (.2).	\$	28.00
June-21	Objections Claims Administration & Objections	6/10/2021	JRW	260	0.1 review reports from vendor (.1)	\$	26.00
June-21	Claims Administration & Objections	6/10/2021	JRW	260	0.1 email exchange regarding agenda and scheduling for conference with vendor (.1).	\$	26.00
June-21	Claims Administration & Objections	6/11/2021	AW	140	0.2 Communicate with claims vendor regarding claims files delivery (.2)	\$	28.00
June-21	Claims Administration & Objections	6/11/2021	AW	140	0.3 respond to claimants' emails (.3).	\$	42.00
June-21	Claims Administration & Objections	6/14/2021	AW	140	0.1 Communicate with K. Duff regarding response to claimant and respond to same (.1)	\$	14.00
June-21	Claims Administration & Objections	6/14/2021	AW	140	0.2 attention to delivered flash drive, access files, and follow up with vendor regarding same (.2).	\$	28.00
June-21	Claims Administration & Objections	6/15/2021	AW	140	0.4 Prepare claims files and email claimants with instructions on how to access (.4)	\$	56.00
June-21	Claims Administration & Objections	6/15/2021	JRW	260	0.1 Confer with A. Watychowicz regarding transfer of claims documentation to claimant (.1)	\$	26.00
June-21	Claims Administration & Objections	6/15/2021	JRW	260	0.2 review draft motion for leave to file subpoena and related email exchange with K. Duff (.2)	\$	52.00
June-21	Claims Administration & Objections	6/15/2021	JRW	260	0.1 correspondence with counsel for claimants regarding claims documentation (.1).	\$	26.00
June-21	Claims Administration & Objections	6/16/2021	AW	140	0.1 Follow up emails to claimant regarding password to access claims files (.1)	\$	14.00
June-21	Claims Administration & Objections	6/16/2021	AW	140	0.1 respond to voice message from claimant regarding question relating to claims (.1)	\$	14.00
June-21	Claims Administration & Objections	6/16/2021	AW	140	0.2 research and communicate with J. Wine regarding updates to claims files and tracking of same (.2)	\$	28.00
June-21	Claims Administration & Objections	6/16/2021	AW	140	0.4 attention to request from claimant's counsel to re-send claims documents, prepare files, and respond to same (.4)	\$	56.00
June-21	Claims Administration & Objections	6/16/2021	AW	140	0	\$	-
June-21	Claims Administration & Objections	6/16/2021	JRW	260	0.2 Exchange correspondence with claimants' counsel and A. Watychowicz regarding claims documentation (.2)	\$	52.00
June-21	Claims Administration & Objections	6/16/2021	JRW	260	0.2 telephone conference with claimant's counsel regarding claims process (.2)	\$	52.00
June-21	Claims Administration & Objections	6/16/2021	JRW	260	0.4 exchange correspondence with claimants' counsel regarding joint status report, review draft and related email to K. Duff regarding potential additions to same (.4)	\$	104.00
June-21	Claims Administration & Objections	6/16/2021	JRW	260	1 study proposed motion and subpoena in preparation for telephone call with claimants' counsel and prepare comments for K. Duff and M. Rachlis (1.0)	\$	260.00
June-21	Claims Administration & Objections	6/16/2021	MR	390	1 Review motion regarding claimants' records requests and related follow-up.	\$	390.00
	Claims Administration & Objections	6/17/2021	AW	140	0.8 Updates to claims files and communicate with J. Wine regarding same (.8)	\$	112.00
June-21	Claims Administration & Objections	6/17/2021	AW	140	1.8 start draft of framing report and exhibits and email J. Wine regarding same (1.8).	\$	252.00
June-21	Claims Administration & Objections	6/17/2021	JRW	260	0.5 Email correspondence with claimants' counsel regarding joint status report (.5)	\$	130.00
	Claims Administration & Objections	6/17/2021	JRW	260	0.3 review and revise joint status report (.3)	\$	78.00
	Claims Administration & Objections	6/17/2021	JRW	260	0.2 confer with K. Duff regarding correspondence from claimants' counsel regarding third party discovery and respond to same (.2)	\$	52.00
	Claims Administration & Objections	6/17/2021	JRW	260	0.1 exchange correspondence with M. Rachlis regarding draft motion for leave to serve subpoena (.1)	\$	26.00
	Claims Administration & Objections	6/17/2021	JRW	260	0.3 exchange correspondence with counsel for claimants' regarding property groupings for claims process (.3)	\$	78.00
June-21	Claims Administration & Objections	6/17/2021	JRW	260	0.5 telephone conference with M. Rachlis and K. Duff regarding third-party subpoenas and motion for leave to serve subpoena on Receiver (.5)	\$	130.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 150 of 157 PageID #:65183

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
June-21	Claims Administration &	6/17/2021	JRW	on 260	0.3 telephone conference with counsel for claimants regarding motion to use discovery in other litigation (.3)	\$	78.00
June-21	Objections Claims Administration &	6/17/2021	MR	390	1 Conferences on claims issues and responses to claimants' counsel communications.	\$	390.00
June-21	Objections Claims Administration & Objections	6/18/2021	AW	140	0.4 Review joint status report on claims and email J. Wine regarding revisions (.4)	\$	56.00
June-21	Claims Administration & Objections	6/18/2021	AW	140	0.2 finalize and file joint status report (.2).	\$	28.00
June-21	Claims Administration & Objections	6/18/2021	JRW	260	0.4 additional revisions and finalization of joint status report (.4)	\$	104.00
June-21	Claims Administration &	6/18/2021	JRW	260	0.2 related email exchange with claimants' counsel (.2)	\$	52.00
June-21	Objections Claims Administration & Objections	6/18/2021	JRW	260	0.1 confer with A. Watychowicz regarding confidentiality order acknowledgements from claimants (.1)	\$	26.00
June-21	Claims Administration &	6/18/2021	MR	390	0.2 Follow up on joint status report.	\$	78.00
June-21	Objections Claims Administration &	6/19/2021	AW	140	0.3 Prepare service email and email claimants joint status report.	\$	42.00
June-21	Objections Claims Administration &	6/21/2021	AW	140	0.3 Call with J. Wine regarding claims process (.3)	\$	42.00
June-21	Objections Claims Administration &	6/21/2021	AW	140	0.2 communicate with K. Duff and J. Wine regarding responses to claimants (.2)	\$	28.00
June-21	Objections Claims Administration & Objections	6/21/2021	AW	140	0.1 communicate with claims vendor regarding response to claimant (.1)	\$	14.00
June-21	Claims Administration & Objections	6/21/2021	JRW	260	0.3 telephone conference with A. Watychowicz regarding institution of claims process and related filings (.3).	\$	78.00
June-21	Claims Administration & Objections	6/22/2021	AW	140	0.2 respond to claimants requesting update to mailing address and update same (.2)	\$	28.00
June-21	Claims Administration & Objections	6/22/2021	AW	140	2.1 prepare conformed names files and list of acknowledgments received to date (2.1)	\$	294.00
June-21	Claims Administration & Objections	6/22/2021	AW	140	0.1 communicate with K. Duff regarding claimant's email (.1)	\$	14.00
June-21	Claims Administration & Objections	6/22/2021	AW	140	0.1 communicate with J. Wine regarding service list containing email addresses of claimants and counsel and timing to prepare (.1).	\$	14.00
June-21	Claims Administration & Objections	6/22/2021	JRW	260	0.9 further revision of proposed motion for leave to serve subpoena and related correspondence with M. Rachlis (.9)	\$	234.00
June-21	Claims Administration & Objections	6/22/2021	JRW	260	0.2 correspondence to SEC and related exchange with K. Duff (.2)	\$	52.00
June-21	Claims Administration & Objections	6/22/2021	JRW	260	0.1 correspondence to counsel regarding suggested revision of proposed motion (.1)	\$	26.00
June-21	Claims Administration & Objections	6/22/2021	JRW	260	0.2 review and comment on proposed vendor service agreement for claimants (.2).	\$	52.00
June-21	Claims Administration & Objections	6/23/2021	AW	140	4.1 Work on service list containing email addresses of claimants and counsel (4.1)	\$	574.00
June-21	Claims Administration & Objections	6/23/2021	AW	140	0.1 respond to claimant's email requesting return of investment (.1)	\$	14.00
June-21	Claims Administration & Objections	6/23/2021	AW	140	0.6 review and comment on draft email to claimants regarding EquityBuild documents (.6).	\$	84.00
June-21	Claims Administration & Objections	6/23/2021	JRW	260	1 Continue working with A. Watychowicz on draft email to claimants regarding EquityBuild documents (1.0)	\$	260.00
June-21	Claims Administration & Objections	6/23/2021	JRW	260	0.4 exchange drafts of notice to claimants with K. Duff and SEC (.4)	\$	104.00
June-21	Claims Administration & Objections	6/23/2021	JRW	260	0.1 related correspondence with claimants' counsel (.1)	\$	26.00
June-21	Claims Administration & Objections	6/23/2021	JRW	260	0.3 confer with A Watychowicz regarding updates to standard discovery requests for and related review of drafts (.3)	\$	78.00
June-21	Claims Administration & Objections	6/23/2021	MR	390	0.4 Review draft communications regarding claims process issues, and related follow up and exchange of emails.	\$	156.00

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Obj	jection
	aims Administration &	6/24/2021	AW	on 140	1.3 continue updates to claimants emailing list (1.3)	\$	182.00
June-21 Cl	bjections aims Administration &	6/24/2021	AW	140	0.4 work on revisions to letter to claimants and related email exchanges with J. Wine (.4)	\$	56.00
June-21 Cl	bjections aims Administration & bjections	6/24/2021	AW	140	0.2 call with J. Wine regarding email to claimants (.2)	\$	28.00
June-21 Cl	aims Administration & bjections	6/24/2021	AW	140	0.5 finalize email and send email to all claimants and counsel (.5).	\$	70.00
June-21 Cl	aims Administration &	6/24/2021	JRW	260	0.1 confer with A. Watychowicz regarding service issues (.1).	\$	26.00
	aims Administration & bjections	6/25/2021	AW	140	0.2 Update mailing info and notify claimant of same (.2)	\$	28.00
O	aims Administration & bjections	6/25/2021	AW	140	0.2 communicate with J. Wine regarding email issue and proposition to post notice regarding EquityBuild documents to Receivership webpage (.2)	\$	28.00
O	aims Administration & bjections	6/25/2021	AW	140	0.8 start revisions to claimants' email list (.8).	\$	112.00
O	aims Administration & bjections aims Administration &	6/25/2021 6/25/2021	JRW JRW	260 260	 0.6 correspondence with counsel for claimants regarding EquityBuild documents, and related exchange of drafts with M. Rachlis and K. Duff and correspondence with counsel for SEC (.6) 0.2 telephone conference with A. Watychowicz regarding updated counsel of record listing (.2) 	\$ \$	156.00 52.00
O	bjections laims Administration &	6/25/2021	MR	390	0.3 Attention to issues with subpoena from claimants.	\$	117.00
O	bjections aims Administration &	6/28/2021	AW	140	0.4 attention to emails regarding standard discovery requests and revise current drafts accordingly (.4).	\$	56.00
O	bjections aims Administration &	6/28/2021	JRW	260	0.6 Exchange emails with SEC, K. Duff and M. Rachlis regarding proposed motion to serve subpoena, revise	\$	156.00
June-21 Cl	bjections aims Administration &	6/28/2021	MR	390	same and send redline to counsel for claimants (.6) 0.2 Further attention to issues on motion related to claimants' request for records.	\$	78.00
June-21 Cl	bjections aims Administration &	6/30/2021	JRW	260	0.3 Correspondence to court clerk regarding procedures for claims process (.3)	\$	78.00
July-21 Cl	bjections aims Administration & bjections	7/6/2021	KBD	390	0.5 Telephone conference and exchange correspondence with J. Wine regarding framing report and review and revise draft framing report (all) (.5)	\$	195.00
July-21 Cl	aims Administration & bjections	7/6/2021	KBD	390	Study standard discovery and related exchange of correspondence with J. Wine. M. Rachlis, and A. Watychowicz (all) (.3)	\$	117.00
July-21 Cl	aims Administration &	7/7/2021	KBD	390	0.2 exchange correspondence with counsel regarding claimant's claim and request for information, and exchange related correspondence with J. Wine (all) (.2)	\$	78.00
•	aims Administration & bjections	7/7/2021	KBD	390	0.2 study revised standard discovery requests (all) (.2).	\$	78.00
0	aims Administration & bjections	7/9/2021	KBD	390	0.3 Study draft communication to claimants regarding claims process and discovery and exchange correspondence with J. Wine regarding potential discovery issues (all) (.3)	\$	117.00
0	aims Administration & bjections	7/12/2021	KBD	390	0.2 exchange correspondence with J. Wine regarding vendor invoice and Court approved payment (all) (.2)	\$	78.00
0	aims Administration & bjections aims Administration &	7/13/2021 7/14/2021	KBD KBD	390 390	0.1 exchange correspondence regarding production of files from claims vendor (all) (.1). 0.2 Exchange correspondence regarding inquiry regarding claimant's claim (all) (.2)	\$ \$	39.00 78.00
O	bjections laims Administration &	7/14/2021	KBD	390	0.1 work on claims analysis approach (all) (.1)	\$ \$	39.00
O	bjections aims Administration &	7/16/2021	KBD	390	0.2 Exchange correspondence regarding evaluation of secured status for claims (all).	\$	78.00
O	bjections aims Administration &	7/20/2021	KBD	390	O.2 Attention to communication from claimant and exchange related correspondence with A. Watychowicz (all).	\$	78.00
Ol July-21 Cl	bjections aims Administration &	7/26/2021	KBD	390	0.1 exchange correspondence with A. Porter regarding third party failure to submit claim (all) (.1)	\$	39.00
July-21 Cl	bjections aims Administration &	7/26/2021	KBD	390	0.1 attention to claimant production records issue (all) (.1).	\$	39.00
July-21 Cl	bjections aims Administration & bjections	7/27/2021	KBD	390	0.2 attention to claims documentation vendor invoice (all) (.2).	\$	78.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 152 of 157 PageID #:65185

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
July-21 Claims Admi	inistration &	7/28/2021	KBD	on 390	0.1 Attention to communication with claimant regarding claim form issues (all) (.1)	\$	39.00
Objections July-21 Claims Admi Objections	inistration &	7/28/2021	KBD	390	0.1 exchange correspondence regarding claims review and analysis (all) (.1)	\$	39.00
July-21 Claims Admi Objections	inistration &	7/29/2021	KBD	390	0.2 Exchange correspondence with J. Wine and A. Porter regarding claims process and review planning (all) (.2)	\$	78.00
July-21 Claims Admi Objections	inistration &	7/29/2021	KBD	390	0.2 attention to correspondence with third party vendor regarding notice and collection issue (all) (.2)	\$	78.00
July-21 Claims Admi Objections	inistration &	7/29/2021	KBD	390	0.2 study and revise correspondence to claimant regarding collection and claim issue (all) (.2)	\$	78.00
July-21 Claims Admi Objections	inistration &	7/30/2021	KBD	390	0.2 study correspondence from claimants' counsel regarding request for EB records and potential subpoena (all) (.2)	\$	78.00
July-21 Claims Admi Objections		7/1/2021	JRW	260	0.2 exchange emails regarding vendor invoice and related correspondence to vendor (.2).	\$	52.00
July-21 Claims Admi Objections		7/6/2021	AW	140	0.1 Attention to acknowledgment received from claimant's counsel and update list for vendor (.1)	\$	14.00
July-21 Claims Admi Objections		7/6/2021	JRW	260	0.4 work with A. Watychowicz on finalizing standard discovery requests to investors (all) (.4)	\$	104.00
July-21 Claims Admi Objections		7/6/2021	JRW	260	0.2 revisions to standard discovery to institutional lenders (all) (.2)	\$	52.00
July-21 Claims Admi Objections		7/6/2021	MR	390	0.3 attention to draft standard discovery and related communications (all) (.3).	\$	117.00
July-21 Claims Admi Objections		7/7/2021	JRW	260	0.1 attention to inquiry from claimants' counsel (all) (.1)	\$	26.00
July-21 Claims Admi Objections		7/9/2021 7/9/2021	AW	140	0.1 Email claimant regarding claims process and timing (all) (.1)	\$ \$	14.00
July-21 Claims Admi Objections			AW	140	0.5 track down requested correspondence to/from claimant and related email exchange with J. Rak (all) (.5)	\$	70.00
July-21 Claims Admi Objections		7/9/2021 7/9/2021	AW	140	 0.6 attention to email from creditor, research regarding prior correspondence and notice of receivership and claims, attention to draft response from K. Duff (all) (.6) 0.2 review claims and related communication with J. Wine (all) (.2) 	\$ \$	84.00 28.00
July-21 Claims Admi Objections July-21 Claims Admi		7/9/2021	JRW	140 260	0.3 Research regarding claimant in response to counsel inquiry (all) (.3)	\$ \$	78.00
Objections July-21 Claims Admi		7/9/2021	JRW	260	0.1 correspondence and research regarding notice provided to claimant (all) (.1)	\$ \$	26.00
Objections July-21 Claims Admi		7/12/2021	AW	140	0.2 attention to email from creditor and email response regarding ongoing claims process (all) (.2).	\$	28.00
Objections July-21 Claims Admi		7/12/2021	JRW	260	0.2 confer with K. Duff regarding documents from defendants' laptops (.2)	\$	52.00
Objections July-21 Claims Admi		7/13/2021	KMP	140	0.2 Prepare forms for funds transfers to services vendor and related communications with bank representatives	\$	28.00
Objections July-21 Claims Admi		7/14/2021	JRW	260	and K. Duff. 0.3 telephone conference with counsel for claimant and related email exchange with K. Duff (all) (.3).	\$	78.00
Objections July-21 Claims Admi		7/16/2021	JRW	260	0.2 office conference with K. Duff regarding claims process and timing (all) (.2).	\$	52.00
Objections July-21 Claims Admi		7/22/2021	AW	140	0.1 Attention to email from claimant requesting a call and follow up by email (all) (.1)	\$	14.00
Objections July-21 Claims Admi		7/26/2021	JRW	260	0.3 review invoices from vendor and related correspondence (all) (.3).	\$	78.00
Objections July-21 Claims Admi		7/27/2021	JRW	260	0.2 review vendor invoices and related email exchanges with K. Duff and K. Pritchard (all) (.2).	\$	52.00
Objections July-21 Claims Admi		7/27/2021	KMP	140	0.2 Communicate with K. Duff and J. Wine regarding claims data vendor invoice .	\$	28.00
Objections July-21 Claims Admi		7/28/2021	AW	140	0.1 follow up with J. Wine regarding response to claimant's counsel (all) (.1)	\$	14.00
Objections July-21 Claims Admi Objections	inistration &	7/28/2021	JRW	260	1.3 study fund documents and related analysis (all) (1.3)	\$	338.00

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
July-21	Claims Administration &	7/28/2021	KMP	<u>on</u> 140	0.2 Prepare payment for claims data vendor invoice.	\$	28.00
July-21	Objections Claims Administration & Objections	7/29/2021	JRW	260	0.3 exchange correspondence with claimants counsel regarding claims documentation and related communications with A. Watychowicz regarding records from vendor (all) (.3).	\$	78.00
July-21	Claims Administration & Objections	7/30/2021	JRW	260	0.2 videoconference with K. Duff regarding claims process (all) (.2)	\$	52.00
August-21	Claims Administration & Objections	8/2/2021	KBD	390	0.7 study communication from claimant's counsel regarding nature of claim and discovery and exchange related correspondence with J. Wine (all) (.7)	\$	273.00
· ·	Claims Administration & Objections	8/2/2021	KBD	390	0.1 attention to communication with claimant (all) (.1).	\$	39.00
_	Claims Administration & Objections	8/3/2021	KBD	390	0.1 exchange correspondence with J. Wine regarding communication with claimants' counsel relating to discovery and claims against funds (all) (.1)	•	39.00
•	Claims Administration & Objections	8/4/2021	KBD	390	0.1 exchange correspondence with J. Wine regarding communication with claimants' counsel regarding request for records (all) (.1)	\$	39.00
· ·	Claims Administration & Objections	8/5/2021	KBD	390	0.1 Work on response to claimant regarding standard discovery (all) (.1)	\$	39.00
•	Claims Administration & Objections	8/6/2021	KBD	390	0.3 exchange correspondence with J. Wine regarding communication with claimants' counsel regarding motion for EB documents, subpoena, and proposed order (all) (.3).		117.00
· ·	Claims Administration & Objections	8/9/2021	KBD	390	0.1 exchange correspondence regarding claimant request for claims information (all) (.1)	\$	39.00
_	Claims Administration & Objections	8/9/2021 8/11/2021	KBD KBD	390 390	0.2 exchange correspondence with J. Wine regarding claims totals and payments to claimants (all) (.2).	\$ \$	78.00 702.00
· ·	Claims Administration & Objections Claims Administration &	8/11/2021	KBD	390	1.8 work on claims analysis with A. Porter, J. Wine, J. Rak, and A. Watychowicz (all) (1.8)0.1 study correspondence from J. Wine regarding claimants' request for records and related confidentiality issues	\$	39.00
· ·	Objections Claims Administration & Claims Administration &	8/13/2021	KBD	390	(all) (.1). 0.2 Exchange correspondence with J. Wine regarding issues relating to claimants' request for claims	э \$	78.00
ŭ	Objections Claims Administration &	8/16/2021	KBD	390	documentation (all) (.2) 0.1 Attention to claimant communication regarding claim and procedures (all).	\$	39.00
· ·	Objections Claims Administration &	8/17/2021	KBD	390	0.5 legal research regarding mortgage validity and enforceability issues (all) (.5)	\$	195.00
_	Objections Claims Administration &	8/20/2021	KBD	390	0.7 Work on claimants' request for records and exchange related correspondence (all) (.7)	\$	273.00
•	Objections Claims Administration &	8/22/2021	KBD	390	0.2 Work on response to claimants' request for records and exchange related correspondence (all).	\$	78.00
· ·	Objections Claims Administration &	8/23/2021	KBD	390	0.3 Exchange correspondence regarding claimants' request for records (all) (.3)	\$	117.00
August-21	Objections Claims Administration &	8/23/2021	KBD	390	0.2 attention to communication with claimant (all) (.2).	\$	78.00
August-21	Objections Claims Administration &	8/25/2021	KBD	390	0.1 study correspondence from and telephone conference with claimant's counsel regarding request for records	\$	39.00
August-21	Objections Claims Administration &	8/30/2021	KBD	390	and exchange related correspondence (all) (.1) 0.6 Confer with legal team regarding analysis of EB transactions (all) (.6)	\$	234.00
August-21	Objections Claims Administration &	8/30/2021	KBD	390	0.5 telephone conference with J. Wine and M. Rachlis regarding hearing before Judge Lee on claimants' request	\$	195.00
August-21	Objections Claims Administration &	8/30/2021	KBD	390	to use EB records in third party litigation (all) (.5) 0.1 attention to issue relating to sequence of claims groups (all) (.1).	\$	39.00
August-21	Objections Claims Administration &	8/31/2021	KBD	390	0.4 Prepare for hearing before Judge Lee and exchange correspondence with M. Rachlis regarding claimants' request to use documents in third party litigation (all) (.4)	\$	156.00
	Objections Claims Administration & Objections	8/31/2021	KBD	390	0.5 appear before Judge Lee for hearing (all) (.5).	\$	195.00
	Claims Administration & Objections	8/2/2021	JRW	260	0.7 review draft motion to serve subpoena and revision history of same, and related correspondence with counsel for claimants and review of new draft (all) (.7).	\$	182.00
August-21	Claims Administration & Objections	8/4/2021	JRW	260	0.2 exchange correspondence with counsel for claimants regarding motion and proposed order (all) (.2)	\$	52.00
	Claims Administration & Objections	8/4/2021	JRW	260	0.1 telephone conference with counsel for claimants regarding claims submissions (all) (.1)	\$	26.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 154 of 157 PageID #:65187

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Ol	ojection
	Keeper	Rate	Hours	Descripti on	Cost		
August-21	Claims Administration & Objections	8/6/2021	AW	140	0.1 communicate with J. Wine regarding total of claims (all) (.1).	\$	14.00
August-21	Claims Administration & Objections	8/6/2021	JRW	260	0.9 review and comment on proposed order granting motion to serve subpoena, revisions to motion and related correspondence with SEC and counsel for claimants (all) (.9)	\$	234.00
August-21	Claims Administration &	8/6/2021	MR	390	0.2 Review communications regarding motion for subpoena and related follow up (all).	\$	78.00
August-21	Objections Claims Administration &	8/9/2021	AW	140	0.3 review sheet depicting total claims and J. Wine's interpretation and related email to K. Duff and J. Wine (.3)	\$	42.00
August-21	Objections Claims Administration &	8/9/2021	JRW	260	0.1 telephone conference with counsel for claimants regarding proposed order granting motion to serve subpoena	\$	26.00
August-21	Objections Claims Administration &	8/11/2021	AW	140	and issues relating to claims against the estate (all) (.1). 0.2 email exchange with J. Wine regarding update to claimants' contacts and process (all) (.2)	\$	28.00
August-21	Objections Claims Administration &	8/11/2021	AW	140	0.1 email communications regarding claims call with J. Rak and K. Pritchard (all) (.1)	\$	14.00
August-21	Objections Claims Administration &	8/11/2021	AW	140	0.1 email J. Rak requested claims documents (all) (.1)	\$	14.00
· ·	Objections Claims Administration &	8/11/2021	AW	140	0.2 call with J. Wine regarding email list and updates (all) (.2)	\$	28.00
· ·	Objections Claims Administration &	8/11/2021	AW	140	0.6 start working on update to contact list for claimants (all) (.6).	\$	84.00
· ·	Objections					•	
_	Claims Administration & Objections	8/11/2021	JRW	260	0.4 telephone conference with claimants' counsel regarding discovery matter and related comments to K. Duff and M. Rachlis (all) (.4)		104.00
· ·	Claims Administration & Objections	8/11/2021	JRW	260	0.3 confer with A. Watychowicz regarding counsel of record for claimants (all) (.3)	\$	78.00
August-21	Claims Administration & Objections	8/12/2021	AW	140	0.8 continued work and communication with J. Wine regarding updated service list (all) (.8)	\$	112.00
August-21	Claims Administration & Objections	8/12/2021	AW	140	1.3 continue work on service list (all) (1.3)	\$	182.00
August-21	Claims Administration & Objections	8/13/2021	AW	140	1.1 Work on updates to service list (all) (1.1)	\$	154.00
August-21	Claims Administration & Objections	8/13/2021	JRW	260	0.3 review revised motion to serve subpoena from claimants' counsel and related internal correspondence (all) (.3)	\$	78.00
August-21	Claims Administration & Objections	8/14/2021	AEP	390	1.7 Begin preparation of comprehensive overview of claims process, including segregation of properties into logical groups, and development of worksheet for tracking information pertaining to claims adjudication (all).	\$	663.00
August-21	Claims Administration & Objections	8/16/2021	AW	140	0.1 Correspond with A. Porter regarding potential claims project (all) (.1)	\$	14.00
August-21	Claims Administration &	8/16/2021	AW	140	0.6 continue work on updates to mailing list (all) (.6)	\$	84.00
August-21	Objections Claims Administration & Objections	8/17/2021	AEP	390	2 Teleconference with K. Duff, J. Rak, J. Wine, and A. Watychowicz regarding strategy for analyzing priority disputes, reconciling claim submissions with EquityBuild records, establishing legal and factual frameworks,	\$	780.00
August-21	Claims Administration &	8/17/2021	AW	140	and prioritizing claims analysis (all). 0.5 work on updates to mailing list (all) (.5).	\$	70.00
August-21	Objections Claims Administration & Objections	8/17/2021	JR	140	2 Teleconference with K. Duff, J. Wine and A. Watychowicz regarding strategy for analyzing priority disputes, reconciling claim submissions with EquityBuild records, establishing legal and factual frameworks, and prioritizing claims analysis (all).	\$	280.00
August-21	Claims Administration &	8/17/2021	JRW	260	nioritizing claims analysis (all). 1.9 conference with A. Porter, K. Duff, and J. Rak regarding claims review (all) (1.9)	\$	494.00
August-21	Objections Claims Administration &	8/17/2021	KMP	140	0.3 Search records for information regarding claimant and related communications with K. Duff.	\$	42.00
August-21	Objections Claims Administration &	8/18/2021	JRW	260	0.2 correspondence with claimants' counsel regarding revisions to draft motion and related telephone conference	\$	52.00
August-21	Objections Claims Administration &	8/20/2021	AEP	390	(all) (.2) 1.1 Prepare first draft of outline of factual and legal framework of analyses associated with litigation of priority	\$	429.00
August-21	Objections Claims Administration & Objections	8/20/2021	JRW	260	disputes between institutional and investor lenders (all). 0.7 Review and revise draft motion to serve subpoena and proposed order and related correspondence with K. Duff and M. Rachlis (all).	\$	182.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 155 of 157 PageID #:65188

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Ob	jection
August-21	Claims Administration &	8/20/2021	MR	on 390	0.5 Review various issues regarding proposed order on subpoena (all).	\$	195.00
August-21	Objections I Claims Administration & Objections	8/23/2021	AW	140	0.2 update emails to claimants (all) (.2)	\$	28.00
August-21	Claims Administration & Objections	8/24/2021	JRW	260	0.3 Review draft motion and subpoena and related correspondence with K. Duff (all).	\$	78.00
August-21	Claims Administration & Objections	8/26/2021	JRW	260	0.1 exchange correspondence with claimants' counsel regarding proposed order (all) (.1)	\$	26.00
ŭ	Claims Administration & Objections	8/26/2021	JRW	260	0.1 review court order setting hearing and related email exchange with K. Duff (all) (.1).	\$	26.00
August-21	Claims Administration & Objections	8/27/2021	AW	140	1.6 research regarding volume of documents submitted by claimants and related email to J. Wine (all) (1.6)	\$	224.00
August-21	Claims Administration & Objections	8/27/2021	JRW	260	0.2 review letter from counsel for third-party regarding pending motion for leave to serve subpoena and related correspondence with K. Duff and M. Rachlis (all) (.2).	\$	52.00
August-21	Claims Administration & Objections	8/27/2021	JRW	260	0.1 confer with claimants' counsel regarding service list (all) (.1)	\$	26.00
August-21	Claims Administration & Objections	8/30/2021	AW	140	0.6 Confer with legal team regarding analysis of EB transactions (all) (.6)	\$	84.00
August-21	Claims Administration & Objections	8/30/2021	AW	140	0.8 research regarding transcript, declarations, and evidentiary exhibits and related communications with K. Duff and R. Weitendorf (all) (.8).	\$	112.00
August-21	Claims Administration & Objections	8/30/2021	JR	140	0.5 Confer with legal team regarding analysis of EB transactions (all) (.5)	\$	70.00
August-21	Claims Administration & Objections	8/30/2021	JR	140	0.3 exchange correspondence with J. Wine regarding next steps in the claims process and emails review pertaining to pertinent claimant issues (all) (.3).	\$	42.00
August-21	Claims Administration & Objections	8/30/2021	JRW	260	0.6 telephone conference with K. Duff and M. Rachlis to prepare for hearing before Judge Lee (all) (.6)	\$	156.00
August-21	Claims Administration & Objections	8/30/2021	JRW	260	0.3 related review of transcripts, orders, and attorney appearances (all) (.3)	\$	78.00
August-21	Claims Administration & Objections	8/30/2021	JRW	260	0.6 conference call with legal team regarding analysis of records (all) (.6)	\$	156.00
August-21	Claims Administration & Objections	8/30/2021	MR	390	0.5 Attention to upcoming hearing on subpoena issue and document production issue and related filing (all) (.5)	\$	195.00
August-21	Claims Administration & Objections	8/30/2021	MR	390	0.3 conference with J. Wine and K. Duff regarding hearing on request for records (all) (.3).	\$	117.00
August-21	Claims Administration & Objections	8/31/2021	JRW	260	0.2 Prepare for motions hearing and related email exchange (all) (.2)	\$	52.00
August-21	Claims Administration & Objections	8/31/2021	JRW	260	0.5 appearance in court for telephonic motions hearing (all) (.5)	\$	130.00
August-21	Claims Administration & Objections	8/31/2021	MR	390	0.3 Further review of materials for upcoming hearing (all) (.3)	\$	117.00
August-21	Claims Administration & Objections	8/31/2021	MR	390	0.5 attend hearing regarding discovery issues (all) (.5).	\$	195.00
September-21	Claims Administration & Objections	9/10/2021	KBD	390	0.7 Confer with A. Porter, M. Rachlis, J. Wine regarding claims analysis (all) (.7)	\$	273.00
September-21	Claims Administration & Objections	9/10/2021	KBD	390	0.1 exchange correspondence with A. Watychowicz regarding communication with claimant regarding claim (all) (.1).	\$	39.00
September-21	Claims Administration & Objections	9/13/2021	KBD	390	0.2 Attention to communication with claimants regarding claims process and documentation issues (all) (.2)	\$	78.00
September-21	Claims Administration & Objections	9/14/2021	KBD	390	0.1 attention to communication with claimant regarding claims process (all) (.1).	\$	39.00
September-21	Claims Administration & Objections	9/16/2021	KBD	390	0.1 review correspondence from J. Wine regarding tax claim (all) (.1).	\$	39.00
September-21	Claims Administration & Objections	9/20/2021	KBD	390	0.2 exchange correspondence with A. Porter regarding potential claims and related legal analysis and considerations (all) (.2).	\$	78.00
September-21	Claims Administration & Objections	9/22/2021	KBD	390	0.1 Attention to claimant communication and exchange related correspondence (all) (.1)	\$	39.00
September-21	Claims Administration & Objections	9/23/2021	KBD	390	0.3 study hearing transcript and telephone conference with J. Wine regarding claims analysis issue (all) (.3)	\$	117.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 156 of 157 PageID #:65189

Entry Date	Time Keeper	Time Keeper Rate	Task Hours	Task Descripti	Task Assessment Category Cost	Obj	jection
September-21	Claims Administration &	9/28/2021	KBD	on 390	0.3 Telephone conference with claimant regarding claims process and various issues (all).	\$	117.00
September-21	Objections Claims Administration &	9/1/2021	AW	140	0.1 attention to email from claimant regarding claims issue and related email to K. Duff and J. Wine (all) (.1)	\$	14.00
September-21	Objections Claims Administration &	9/2/2021	AW	140	0.2 Attention to emails from claimants and respond to same (all) (.2)	\$	28.00
September-21	Objections Claims Administration &	9/7/2021	AW	140	0.1 Attention to email from counsel regarding representation and related email to J. Wine (all) (.1)	\$	14.00
September-21	Objections Claims Administration &	9/7/2021	AW	140	0.2 attention to voice message from counsel, review emails and claimant's discovery responses, and related email	\$	28.00
September-21	Objections Claims Administration &	9/7/2021	JRW	260	to J. Wine (all) (.2). 0.1 correspond with A. Watychowicz regarding searches and related review of correspondence with vendor (all)	\$	26.00
September-21	Objections Claims Administration &	9/7/2021	JRW	260	(.1)0.1 confer with A. Watychowicz regarding counsel inquiry (all) (.1).	\$	26.00
September-21	Objections Claims Administration &	9/8/2021	AW	140	0.2 Email correspondence to claimant and counsel (all) (.2)	\$	28.00
September-21	Objections Claims Administration &	9/9/2021	AW	140	1.9 Continue work on update of counsel information for claimants (all) (1.9)	\$	266.00
September-21	Objections Claims Administration &	9/9/2021	JRW	260	0.3 Correspondence with A. Watychowicz regarding counsel representation of claimants and follow-up email to	\$	78.00
September-21	Objections Claims Administration &	9/10/2021	AW	140	claimants' counsel (all) (.3) 0.2 Attention to questions from claimant and update his mailing information (all) (.2)	\$	28.00
September-21	Objections Claims Administration &	9/10/2021	AW	140	0.1 attention to follow up email regarding representation (all) (.1).	\$	14.00
September-21	Objections Claims Administration &	9/13/2021	AW	140	0.2 communicate with claimant regarding claim and his trustee (all) (.2)	\$	28.00
September-21	Objections Claims Administration &	9/13/2021	AW	140	0.2 communicate with K. Duff and J. Wine regarding claims percentage issue and related email to claimant (all)	\$	28.00
September-21	Objections Claims Administration &	9/13/2021	AW	140	(.2) 0.1 communicate with K. Duff and J. Wine regarding received documents from claimant and related email to	\$	14.00
September-21	Objections Claims Administration &	9/13/2021	KMP	140	claimant (all) (.1). 0.2 Communications with J. Wine and A. Watychowicz regarding inquiry by claimant (all).	\$	28.00
September-21	Objections Claims Administration &	9/14/2021	AW	140	0.1 Follow up with J. Wine regarding claimant's email (all) (.1)	\$	14.00
September-21	Objections Claims Administration &	9/14/2021	JRW	260	0.1 attention to claimant email (all) (.1).	\$	26.00
September-21	Objections Claims Administration &	9/17/2021	JRW	260	0.2 review invoice and related email exchange with K. Duff (all) (.2)	\$	52.00
September-21	Objections Claims Administration &	9/17/2021	KMP	140	0.2 Communicate with K. Duff regarding payment of vendor invoices (all).	\$	28.00
September-21	Objections Claims Administration &	9/20/2021	AEP	390	2.4 Research regarding competing lien claims and interests and prepare e- mails to K. Duff regarding preliminary	\$	936.00
September-21	Objections Claims Administration &	9/22/2021	AW	140	conclusions (all). 0.3 Communicate with K. Duff and J. Wine regarding hearing inquiries from claimant and respond to emails (all)	\$	42.00
September-21	Objections Claims Administration &	9/22/2021	AW	140	(.3) 0.1 attention to email from claimant regarding resolution of claims process and related email response (all) (.1)	\$	14.00
September-21	Objections Claims Administration &	9/22/2021	AW	140	0.1 communicate with vendor regarding access to online account (all) (.1)	\$	14.00
September-21	Objections Claims Administration &	9/23/2021	JRW	260	0.2 exchange correspondence with A. Watychowicz regarding investor discovery relating to other groups (all) (.2)	\$	52.00
September-21	Objections Claims Administration &	9/23/2021	JRW	260	0.2 exchange correspondence with A. Porter regarding factual analysis of discovery materials (all) (.2)	\$	52.00
September-21	Objections Claims Administration &	9/23/2021	JRW	260	0.2 review transcript of proceedings and related email to K. Duff (all) (.2)	\$	52.00
September-21	Objections Claims Administration &	9/27/2021	AW	140	0.2 Email response to claimant's voice message (all).	\$	28.00
September-21	Objections Claims Administration & Objections	9/27/2021	JRW	260	0.2 telephone conference with claimants' counsel regarding proofs of claim and related email exchange (all) (.2)	\$	52.00

Case: 1:18-cv-05587 Document #: 1230 Filed: 04/01/22 Page 157 of 157 PageID #:65190

Entry Date	Time	Time Keeper	Task	Task	Task Assessment Category	Obj	ection
	Keeper	Rate	Hours	Descripti	Cost		
				on			
September-21 Claims Administration &		9/28/2021	AW	140	0.1 review shared folder from claimant and related email to J. Wine (all) (.1).	\$	14.00
Obj	ections						
September-21 Claims Administration &		9/28/2021	JRW	260	0.1 Exchange correspondence with A. Watychowicz regarding investor inquiry (all) (.1)	\$	26.00
Obj	ections						
September-21 Claims Administration &		9/30/2021	JRW	260	0.3 confer with claimants' counsel regarding subpoena to title company and review records regarding same (all)	\$	78.00
Obj	ections				(.3)		