

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES SECURITIES AND  
EXCHANGE COMMISSION,

Plaintiff,

v.

EQUITYBUILD, INC., EQUITYBUILD  
FINANCE, LLC, JEROME H. COHEN, and  
SHAUN D. COHEN,

Defendants.

Case No. 1:18-cv-5587

Hon. John Z. Lee

**MORTGAGEES' RESPONSE TO RECEIVER'S FOURTEENTH INTERIM  
APPLICATION AND MOTION FOR COURT APPROVAL OF PAYMENT OF FEES  
AND EXPENSES OF RECEIVER AND RECEIVER'S RETAINED PROFESSIONALS**

The Mortgagees identified on Exhibit A object to the Receiver's Fourteenth Interim Fee Application and Motion for Court Approval of Payment of Fees and Expenses of Receiver and Receiver's Retained Professionals (the "14<sup>th</sup> Fee Application") on the same bases contained in their prior objections, which objections this Court has denied. They also object generally to the Receiver's request in his 14th Fee Application for a super priority lien for the same reasons contained in Mortgagees' Response to Motion for Approval to Pay Certain Previously Approved Fees and Cost (Dkt. 961), which the Court denied with respect to fees incurred in (i) the preservation, management, and liquidation of certain real estate belonging to the Receivership Estate, and (ii) the implementation and management of an orderly summary claim-priority adjudication process. (Dkt. 1030.)

While preserving the above objections, the Mortgagees further object to the Receiver's request that fees (the "Fees") and expenses shown on Exhibits F through I of the 14<sup>th</sup> Fee Application be paid on a first priority basis from the proceeds of the sale of certain Receivership

real properties (the “Properties”) (Dkt. 1181, pp. 14, 15) to the extent that they are not covered by the Court-approved Priming Lien Categories. The Mortgagees request that the Receiver’s request for a priority lien and his allocations be referred to Magistrate Judge Kim because the Mortgagees’ similar objections in response to the Receiver’s Motion for Approval of Allocations of Fees to Properties for Payment Pursuant to Receiver’s Lien (“Fee Allocation Motion”) (Dkt. 1107) are pending before Magistrate Judge Kim.

Finally, the Mortgagees request a 20% holdback of Fees requested in the Receiver’s 14<sup>th</sup> Fee Application (Dkt. 1031) and an additional 20% holdback on the payment of all Fees (Dkt. 1030, p. 15) for the same reasons contained in their objections to the Receiver’s ninth, tenth, eleventh, twelfth and thirteenth fee applications (Dkt. 907, 960, 1000, 1039, 1188) and the orders providing for those holdbacks (Dkt. 1030, 1031, 1213, p. 9).

## **BACKGROUND**

1. During the course of the Receivership, the Receiver has submitted quarterly requests for approval of his Fees (“Fees”) to which the Mortgagees objected, arguing, among other things, that the Estate was underwater and that many of their secured claims exceeded the value of their collateral. (*See e.g.* Dkts. 442, 511, 581, 595, 617, 648, 777, 907, 960, 1000 and 1039.) The Court has denied those objections. (See Dkt. 1031.)

2. On October 26, 2020, the Court awarded the Receiver a receiver’s lien and approved the Receiver’s methodology of allocating that lien among the Properties: “expenses relating directly to a property will be allocated to that property; billing pertaining to the recovery of unsecured funds will not be allocated to any properties; and remaining fees and expenses will be allocated to the properties as a percentage of their gross sales price, once that value is determined for each.” (Dkt. 824, p. 5.) However, the Court stated that the priority of the

Receiver's lien as to any of the Properties – whether it would prime a secured lien – would be determined as part of the claims resolution process. (Dkt. 824, p. 6.)

3. On August 17, 2021, the Court, over the Mortgagees' objections (*see* Dkt. 961), determined that the Receiver would be entitled to a super priority lien for certain categories of Fees. (Dkt. 1030.) In entering that order, the Court recited that the Receiver has now conceded that there were insufficient unencumbered Estate assets to pay his Fees and sought the imposition of a first priority or priming lien against the Properties. (Dkt 755; 1030, p. 5.)

4. The two Court-approved categories that would be the basis of a priority lien were Fees incurred for “(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” (the “Court-Approved Priming Lien Categories”). (Dkt. 1030.) The Court noted that it was not declaring that every entry on the Receiver's submitted schedules “actually falls within the two categories of billing described above. Magistrate Judge Kim may find that a particular line item falls outside those categories or reflects activities that will not benefit the Estate's creditors.” (Dkt. 1030, pp. 161-7.) The Court also excluded, for the time being, Fees related to the claim-priority adjudications, such as discovery, filing a framing report, and making recommendations to the Court, because the benefit to the to-be-determined first-priority secured creditor cannot be determined until the conclusion of the claims process. (Dkt. 1030, p. 14, n.7.)

5. The Court authorized interim payments of the Receiver's Fees through the priming lien, but mandated a 20% holdback on the payment of all fees, but not expenses. (Dkt. 1030, p. 15.) Based upon the 20% holdback of fees requested in the Receiver's ninth, tenth, and

eleventh fee applications (Dkt. 1031), any fees approved for payment are limited to 80% of the 80% of the approved Fees.

6. The Court directed that the Receiver may seek approval of his proposed allocation by a separate motion to be referred to Magistrate Judge Kim for disposition, with instructions that the Receiver file by September 7, 2021 a motion for his proposed line-by-line and property-by-property fee allocation. (Dkt. 1030.) In a footnote, the Court advised the Receiver “to be mindful of *Elliott’s* [*SEC v. Elliott*, 953 F.2d 1560 (11th Cir. 1992)] admonishment that an across-the-board allocation may be inappropriate. *Elliott*, 953 F.2d at 1578 (“We hold that merely counting heads is not an equitable way to divide the burden of the receivership. *Secured creditors should only be charged for the benefit they actually receive*. That their claims represented a large portion of the gross proceeds does not necessarily mean the Receiver spent an equally proportionate amount of time on their claims. . . . 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 [allocation] order . . . disclose the results of this effort.” [Emphasis added.]). *Cf. Gaskill v. Gordon*, 27 F.3d 248, 254 (7th Cir. 1994) (“We must remand this case to the district court to set out in greater detail the expenditures included in the \$265,000 lien.”) (Dkt. 1030, p.16, n.8.)

#### *The Fee Allocation Motion*

7. On December 22, 2021, the Receiver filed his Fee Allocation Motion. (Dkt. 1107.) His allocations were set forth in 108 different property reports, averaging 180 pages each, and a 190-page General Task Detail, which showed fees allocated to each of the properties based upon gross sale proceeds. (Dkt. 1107.)

8. On February 10, 2022 , the Mortgagees filed their Motion For Appointment Of A Fee Examiner, Or, In The Alternative, to Establish A Practical And Cost Effective Procedure To Respond To The Receiver's Fee Allocation Motion And Sufficient Time To Do So. (Dkt. 1177.)

9. On February 17, 2022, Magistrate Judge Kim denied the motion for the appointment of a fee examiner. (Dkt. 1184).

10. On March 6, 2022, Mortgagees filed their response to the Fee Allocation Motion. (Dkt. 1210.)

11. On April 1, 2022, the Receiver filed his reply in support of his Fee Allocation Motion. (Dkt. 1230.) The Court has not ruled on that motion.

*12<sup>th</sup> Fee Application*

12. On March 14, 2022, the Court entered an order granting the Receiver's twelfth fee application. (Dkt. 1213.) In that Order, the Court denied the Receiver's request to pay all of the Fees and expenses pursuant to the first priority lien. It directed the Receiver to file a separate motion detailing the specific Fees and expenses be paid as a first lien. (Dkt. 1213, p. 8.) The Order also provided a 20% holdback of the Receiver's Fees and an additional 20% holdback on any Fees paid from the encumbered real estate. (Dkt. 1213, p. 9.)

*13<sup>th</sup> Fee Application*

13. On November 15, 2021, the Receiver filed his Thirteenth Fee Application. (Dkt. 1087).

14. On February 18, 2022, certain Mortgagees filed a Response To Receiver's Thirteenth Interim Application And Motion For Court Approval Of Payment Of Fees And Expenses Of Receiver And Receiver's Retained Professionals. (Dkt. 1188.)

15. The Receiver filed his reply on March 4, 2022. (Dkt. 1207). That application remains pending.

**I. The Mortgagees Assert The Same Objections To The Receiver's 14<sup>th</sup> Fee Application As They Asserted To The Receiver's Prior Fee Applications.**

The Mortgagees adopt and assert their objections to the Receiver's prior fee applications (Dkts. 1210, 1188, 1039, 1000, 960, 792, 777, 648, 617, 595, 581, 509, 438) to the Receiver's 14<sup>th</sup> Fee Application, to preserve those objections by incorporating them by reference into this response.

**II. The Receiver Has Failed to Show That His Fees and Expenses in His 14<sup>th</sup> Fee Application Fall Within the Court-Approved Priming Lien Categories.**

The Receiver requests that the Fees shown on, among other exhibits, Exhibits F and G, be paid as a first lien from the proceeds of the sales of the Properties. The Receiver also attaches Exhibit K, titled "EquityBuild – Property Allocation Summary," "Draft – Subject to Change." The Receiver does not identify in Exhibit K the tasks that he has allocated to each property, either as a general allocation or a specific allocation. He denominated it a draft document, subject to change. He does not furnish any compilations showing the Fees that fall with the requested tentative allocations.

The Receiver's narrative in his 14<sup>th</sup> Fee Application of the services furnished during the period covered by the 14<sup>th</sup> Fee Application shows that many of those services are not covered by the Court-Approved Priming Lien Categories or, to the extent that they are covered, otherwise should not be paid as a priority lien, as discussed below. Although the Receiver may have invoiced the Fees in accordance with SEC billing protocols, such compliance alone does not establish that they fall within the Court-Approved Priming Lien Categories.

The Mortgagees have color highlighted sample entries on the Receiver and his attorneys' monthly invoices (Exhibits F and G to the 14<sup>th</sup> Fee Application) to illustrate Fees that should not prime their liens, a copy of which is attached as Ex. B. The bases of these specific objections are as follows:

*First*, Fees that are not covered by either of the Court-Approved Priming Lien Categories are highlighted in red. These include:

- Fees incurred to give notice of the Receiver's appointment to individuals or entities which have been identified as potentially possessing property, books, or records of the Receivership Defendants (Dkt. 1181, pp. 7-8) because those efforts are receivership tasks that were not furnished to preserve, manage, or liquidate real estate belonging to the Receivership Estate or manage the claims administration process, and thus are not covered by the Court-Approved Priming Lien Categories. The Receiver fails to show in the 14<sup>th</sup> Fee Application why those Fees should be paid as part of its priority lien.
- Fees incurred in efforts to locate and preserve records because the Receiver fails to show that they are related to the management or disposition of the Properties or the management of the claims administration process, especially because the EquityBuild Records were deposited with a third-party vendor before the commencement of the Group One claim process in the summer of 2021.
- Fees incurred for the "factual investigation" and actions against EquityBuild professionals (Dkt. 1181, pp. 8-9) do not fall within either of the two Court-Approved Priming Lien Categories.

- Fees incurred with respect to tax issues (Dkt. 1181, p. 9) have no relation to the two Court-Approved Priming Lien Categories
- Fees incurred to resolve claims relating to properties that were sold before the commencement of the Receivership (Dkt. 1181, pp. 11-12) do not fall within the Court-Approved Priming Lien Categories and do not benefit any of the properties subject to claims resolution process or the secured creditors.
- Fees incurred to address creditor inquiries (Dkt. 1181, p. 12) fall outside the scope of the Court-Approved Priming Lien Categories. The Receiver has failed to show that they were incurred with respect to preservation, management or disposition of properties or the management of the claims adjudication process.
- Fees incurred with respect to state court actions (Dkt. 1181, p. 7), *Pennington v. 4533 Calumet, LLC*, Case No. 2021 L 010115 (pollutants action) and *Byrd v. EquityBuild, Inc., et al.*, Case No. 18 L 1993 (personal injury), should be excluded because the Receiver has failed to show that the actions were not the result of errors or omissions of the Receiver or his vendors.
- Fees where the tasks do not identify the property and include in a parenthetical “defer” (see e.g., Dkt. 1181, p. 38, 10/18/2021 entry) and entries that lack sufficient detail to show that they should be paid as a priming lien should not be paid as part of the Receiver’s priming lien.

*Second*, Fees incurred to address open building code violations (Dkt. 1181, p. 5) do not support a priming lien where the Receiver caused the violation by either causing the condition or failing to cure it. The Receiver fails to provide sufficient information to show the nature of the violations, such as the occurrence date, or the claimed violation, to show that the Fees were



incurred not as the result of the Receiver or his vendor's failure to comply with the Chicago Municipal Code. Examples are highlighted in green.

*Third*, Fees incurred to litigate Group 1 claims (Dkt. 1181, pp. 10-11) are not payable at this time through a priming lien. The Court has ruled that whether the time spent litigating the Group 1 claims could be paid from a priority lien would be determined as part of the claims adjudication process. (Dkt. 1030, p. 14, n.7.) Examples are highlighted in yellow.

*Fourth*, Midland and US Bank as Trustee (both as defined in Exhibit A) object to a priming lien for Fees incurred to resolve Mortgagees' claims where no other claims were submitted for particular properties (Dkt. 1181, p. 11-12).<sup>1</sup> If the Receiver objects and prevails, the liens would be invalid, making the proceeds of the sale of the affected properties unsecured funds. Any recovery would be for the benefit of the unsecured creditors. As such, these fees fall within the Court's prohibition of a lien for fees "pertaining to the recovery of unsecured funds." Order Granting Receiver's 7<sup>th</sup> and 8<sup>th</sup> Fee Applications (ECF 824); *also SEC v. Elliott*, 953 F.2d 1560, 1577-78 (11th Cir. 1992) (holding that secured creditors "are not liable for the Receiver's time spent on activities adverse to them," including "the time the Receiver spent opposing their claims to be secured.") If the Receiver does not prevail, it cannot be said that his efforts benefitted those properties or the secured creditors. Any efforts to develop that process were for the Receiver's benefit, to provide him with a process in which he could assert those claims (as

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<sup>1</sup> The Single-Claim Properties are properties against which only one claimant has asserted that it holds a lien. They are: 1017 W 102nd Street, 1516 E 85th Place, 2136 W 83rd Street, 417 Oglesby Avenue, 7922 S Luella Avenue, 8030 S Marquette Avenue, 8104 S Kingston Avenue, 8403 S Aberdeen Street, 8529 S Rhodes Avenue, 11318 S Church Street, 2129 W 71st Street, 6749-59 S Merrill Avenue, 7110 S Cornell Avenue, 7925 S. Kingston, 9212 S. Parnell, 7210 S. Vernon, 6825 S. Indiana, 406 E 87th Place, 6554 S. Rhodes, 7712 S. Euclid, 8432 S. Essex, 3213 S Throop, 8107 S. Kingston, 8346 S. Constance, 10012 S LaSalle, 9610 S. Woodlawn, 6759 S. Indiana Ave, and 8517 S. Vernon.

opposed to the claims adjudication process to resolve claims of competing secured creditors). If he did not chose to assert claims, then the sale proceeds could be disbursed to the Midland and US Bank as Trustee. Examples are highlighted in grey.

**III. The Receiver’s Proposed Allocations Should be Referred to Magistrate Judge Kim.**

The Court previously referred the Receiver’s Fee Allocation Motion to Magistrate Judge Kim for disposition. (Dkt. 1112.) The Mortgagees filed a detailed response. (Dkt. 1210.) That motion is currently pending before Magistrate Judge Kim. The Mortgagees request that the Court refer the Receiver’s request that the tasks shown on his exhibits be approved as a priming lien and allocated as shown on that exhibit to Magistrate Judge Kim for the same reasons that the Receiver’s Fee Allocation Motion has been referred to Judge Kim and to foster uniformity.

Further, the Receiver attached to his 14<sup>th</sup> Fee Application his proposed allocation as Exhibit K, titled “EquityBuild – Property Allocation Summary,” “Draft – Subject to Change.” Because the Receiver does not identify in Exhibit K the tasks that he has allocated to each property, either as a general allocation or a specific allocation, and denominated it as a draft document, subject to change, the allocation issue should be referred to Judge Magistrate Kim after the Receiver prepares his final allocation and supporting material. Although in many cases the Receiver and his attorneys’ invoices identify which of the Properties they assert benefitted from the services provided, the Receiver has not collated those assignments on separate spreadsheets for each of the Properties to permit their evaluation.

**IV. The 14<sup>th</sup> Fee Application Should Be Subject To A 20% Holdback.**

Consistent with the Court’s order approving the Receiver’s ninth, tenth, and eleventh fee petitions (Dkt. 1031, pp. 13-14), and twelfth fee petition, (Dkt. 1213, p. 9), if the Court approves the fees requested in the 14<sup>th</sup> Fee Application, the Mortgagees request that any approved fees be

subject to a 20% holdback. Further, consistent with the Court's August 17, 2021 Order (Dkt. 1030, pp. 14-16) and March 14, 2022 order (Dkt. 1213), if the Receiver seeks to pay its approved fees from the proceeds of the sales of the Properties, the Mortgagees request an additional 20% holdback. In further support of this request, the Mortgagees incorporate by reference their requests for a 20% holdback contained in the Mortgagees' objections to the Receiver's ninth, tenth and eleventh fee applications (Dkts. 907, pp.10-12, 960, pp. 12-14, and 1000, pp. 11-13).

The Receiver argued in his reply to the Mortgagees' objections to his thirteenth fee application (Dkt. 1207, pp 9-13), that the Court should not holdback funds because his firm has discounted its rates. The Receiver's "discount" of his firm's rates to promote the Court's appointment of him as the receiver, which also reflects a volume discount, does not serve the purpose of holdbacks. As the Court has reiterated in this case, holdbacks are appropriate here because a court cannot accurately determine the reasonable value of the services reflected in an interim application, "to avoid even the appearance of a windfall," and to incentivize timely resolution. (Dkt. 1030, pp. 14-16; Dkt. 1031 pp. 11-13; Dkt. 1213, pp. 8-9.) Indeed, when the Court first ordered a holdback, it noted that the Receiver had discounted his firms standard rates, but still determined that holdbacks were appropriate. (Dkt. 1031, p. 9.) Further, when the Court first ordered a holdback, after it had denied the Mortgagees' prior requests for holdbacks, the Court noted that it rejected the Mortgagees' prior requests for holdbacks because the Receiver had represented to the Court (contrary to the Mortgagees' contentions) that the Receivership Estate was not insolvent, but now conceded "the possibility that the Estate's funds may be insufficient to fully compensate all of the secured creditors." (Dkt. 1031, p.13.) A comparison of the claims asserted against the Properties as reported by the Receiver in his last status report, filed on April 29, 2022 (Dkt. 1243, 1243-1, pp. 12-58), and the sale proceed funds held by the

Receiver (Dkt. 1243-1, pp. 5-6) demonstrates that the Estate’s funds may not suffice to compensate the secured creditors. Therefore, the two 20% holdbacks should apply to the approval of any Fees identified in the 14<sup>th</sup> Fee Application.

**CONCLUSION**

Consequently, the Mortgagees request that the Court deny the Receivers 14<sup>th</sup> Fee Application on the grounds raised in their objections to the Receiver’s prior fee applications. If the Fees are approved, the Mortgagees request that only those Fees that are covered by the Court-Approved Priming Lien Categories can be paid as part of the Receiver’s priming lien and that the Court refer the determination of issue of priority and allocation to Magistrate Judge Kim. They further request that any approved fees be subject to a 20% holdback and that any payment of approved fees be subject to an additional 20% holdback.

Respectfully submitted,

<p><u>/s/ Michael Gilman</u>                  Edward S. Weil                  (eweil@dykema.com)                  Michael A. Gilman                  (<a href="mailto:mgilman@dykema.com">mgilman@dykema.com</a>)                  Todd Gale                  (tgale@dykema.com)                  Benjamin W. Chertok                  (bchertok@dykema.com)                  Kevin Connor                  (kconnor@dykema.com)                  Dykema Gossett PLLC                  10 S. Wacker Drive                  Suite 2300                  Chicago, Illinois 60606                  (312) 627-5675  <i>Federal Home Loan Mortgage Corporation                  Wilmington Trust, National Association, as                  Trustee for the Registered Holders of Wells</i></p>	<p><u>/s/ Ronald A. Damashek</u>                  Ronald Damashek                  (rdamashek@dickinsonwright.com)                  Dickinson Wright PLLC                  55 West Monroe Street — Suite 1200                  Chicago, Illinois 60603  <b>PH:</b> (312) 377-7858                  Fax: (312) 423-8160  <i>Counsel for Citibank N.A., as Trustee for                  the Registered Holders of Wells Fargo                  Commercial Mortgage Securities, Inc.,                  Multifamily Mortgage Pass-Through                  Certificates, Series 2018-SB14;                  Midland Loan Services, a Division of PNC                  Bank, National Association; Thorofare Asset                  Based Lending REIT Fund IV, LLC; and                  EBCP, LLC</i>   <u>s/ Jill L. Nicholson</u>                  Jill L. Nicholson (<a href="mailto:jnicholson@foley.com">jnicholson@foley.com</a>)</p>
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<p><i>Fargo Commercial Mortgage Trust 2014-LC16, Commercial Mortgage Pass-Through Certificates, Series 2014-LC16; Wilmington Trust, National Association, as Trustee for the Registered Holders of UBS Commercial Mortgage Trust 2017-C1, Commercial Mortgage Pass-Through Certificates, Series 2017-C1; Citibank N.A., as Trustee for the Registered Holders of Wells Fargo Commercial Mortgage Securities, Inc., Multifamily Mortgage Pass-Through Certificates, Series 2018-SB48; Federal National Mortgage Association; U.S. Bank National Association, as Trustee for the registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2017-SB41; U.S. Bank National Association, as Trustee for the registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2018-SB50; U.S. Bank National Association, as Trustee for the registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2017-SB30 Sabal TLI LLC; Midland Loan Services, a Division of PNC Bank, N.A. as servicer for Wilmington Trust, N.A., as Trustee for the Benefit of Corevest American Finance 2017-1 Trust Mortgage Pass-Through Certificates; Midland Loan Services, a Division of PNC Bank, N.A. as servicer for Wilmington Trust, N.A., as Trustee for the Registered Holders of Corevest American Finance 2017-2 Trust, Mortgage Pass-Through Certificates, Series 2017-2; BC57, LLC; UBS AG; 1111 Crest Dr., LLC, Pakravan Living Trust, Hamid Ismail, Farsaa, Inc.; Thorofare Asset Based Lending REIT Fund IV LLC</i></p>	<p>Andrew T. McClain (amcclain@foley.com)                  Foley &amp; Lardner LLP                  321 N. Clark St., Ste. 3000                  Chicago, IL 60654                  Ph: (312) 832-4500                  Fax: (312) 644-7528  <i>Counsel for Citibank N.A., as Trustee for the Registered Holders of Wells Fargo Commercial Mortgage Securities, Inc., Multifamily Mortgage Pass-Through Certificates, Series 2018-SB48; U.S. Bank National Association, as Trustee for the Registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2017-SB30; U.S. Bank National Association, as Trustee for the Registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2017-SB41; U.S. Bank National Association, as Trustee for the Registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2018-SB50; Wilmington Trust, National Association, as Trustee for the Registered Holders of Wells Fargo Commercial Mortgage Trust 2014-LC16, Commercial Mortgage Pass-Through Certificates, Series 2014-LC16; Federal National Mortgage Association; and Sabal TLI, LLC</i></p>
<p>s/Jay L. Welford                  Jay L. Welford                  Counsel to Liberty EBCP, LLC</p>	<p>s/ William J. Serritella, Jr.                  William J. Serritella, Jr.</p>

<p><a href="mailto:jwelford@jaffelaw.com">jwelford@jaffelaw.com</a> JAFFE RAITT, HEUER &amp; WEISS, P.C. Jay L. Welford (P34471) 27777 Franklin Road, Suite 2500 Southfield, Michigan 48034 (248) 351-3000</p> <hr/> <p>s/ Mark S. Landman <a href="mailto:mlandman@lcbf.com">mlandman@lcbf.com</a> Landman Corsi Ballaine &amp; Ford P.C. 120 Broadway, 13th Floor New York, NY 10271 Ph: (212) 238-4800 Fax: (212) 238-4848 <i>Counsel for Freddie Mac</i></p> <hr/> <p>/s/ Thomas B. Fullerton Thomas B. Fullerton (6296539) Akerman LLP 71 S. Wacker Drive, 47th Floor Chicago, IL 60606 (312) 634-5700 <a href="mailto:thomas.fullerton@akerman.com">thomas.fullerton@akerman.com</a></p> <hr/> <p>/s/ Michael D. Napoli Michael D. Napoli (TX 14803400) Akerman LLP 2001 Ross Avenue, Suite 3600 Dallas, TX 75201 (214) 720-4360 <a href="mailto:michael.napoli@akerman.com">michael.napoli@akerman.com</a> <i>Counsel for Midland Loan Services, a Division of PNC Bank, National Association</i></p>	<p><a href="mailto:wserritella@taftlaw.com">wserritella@taftlaw.com</a> Taft Stettinius &amp; Hollister LLP 111 East Wacker Drive, Suite 2800 Chicago, IL 60601 (312) 527-4000</p> <hr/> <p>/s/ Jennifer Walker Jennifer Walker <a href="mailto:JWalker@plunkettcooney.com">JWalker@plunkettcooney.com</a> Plunkett Cooney, PC 221 N. LaSalle Street, Ste. 3500 Chicago, IL 60601 Ph: (312) 970-3410 Fax: (248) 901-4040 <i>Counsel for UBS AG</i></p> <hr/> <p>/s/William Wurm William Wurm, #6324871 <a href="mailto:William.Wurm@stinson.com">William.Wurm@stinson.com</a> Bradley Anderson (Bradley.Anderson@stinson.com) 7700 Forsyth Blvd., Suite 1100 St. Louis, MO 63105 Phone: (314) 863-0800 Fax: (314) 259-3931 <i>Attorneys for BMO Harris Bank, N.A., and Midland Loan Services, a division of PNC Bank, NA, acting under authority designated by Colony American Finance Lender, LLC, assignee Wilmington Trust, N.A. as Trustee for the benefit of registered holder of Colony American Finance 2015-1</i></p> <hr/> <p>/s/ David Hart David Hart <a href="mailto:dhart@maddinhauser.com">dhart@maddinhauser.com</a> Robert M. Horwitz <a href="mailto:rhowitz@maddinhauser.com">rhowitz@maddinhauser.com</a> Maddin, Hauser, Roth &amp; Heller, P.C. 28400 Northwestern Highway Suite 200-Essex Centre Southfield MI 48034 Phone: (248) 827-1884 Fax: (248) 359-6184 <i>Counsel for BC57, LLC</i></p>
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# **EXHIBIT A**



EXHIBIT A

Freddie Mac; Citibank N.A., as Trustee for the Registered Holders of Wells Fargo Commercial Mortgage Securities, Inc., Multifamily Mortgage Pass-Through Certificates, Series 2018-SB48; U.S. Bank National Association, as Trustee for the Registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2017-SB30; U.S. Bank National Association, as Trustee for the Registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2017-SB41; U.S. Bank National Association, as Trustee for the Registered Holders of J.P. Morgan Chase Commercial Mortgage Securities Corp., Multifamily Mortgage Pass-Through Certificates, Series 2018-SB50; Wilmington Trust, National Association, as Trustee for the Registered Holders of Wells Fargo Commercial Mortgage Trust 2014-LC16, Commercial Mortgage Pass-Through Certificates, Series 2014-LC16; Wilmington Trust, National Association, as Trustee for the benefit of the registered holders of UBS Commercial Mortgage Trust 2017-C1, Commercial Mortgage Pass-Through Certificates, Series 2017-C1; Federal National Mortgage Association (“Fannie Mae”); BMO Harris Bank N.A.; Midland Loan Services, a Division of PNC Bank, National Association; Midland Loan Services, a Division of PNC Bank, N.A. as servicer for Colony American Finance 2015-1; Midland Loan Services, a Division of PNC Bank, N.A. as servicer for Wilmington Trust, N.A., as Trustee for the Registered Holders of Corevest American Finance 2017-2 Trust, Mortgage Pass-Through Certificates, Series 2017-2; Midland Loan Services, a Division of PNC Bank, N.A. as servicer for Wilmington Trust, N.A., as Trustee for the Benefit of Corevest American Finance 2017-1 Trust Mortgage Pass-Through Certificates; BC57, LLC; UBS AG; Thorofare Asset Based Lending REIT Fund IV, LLC; and Liberty EBCP, LLC.; 1111 Crest Dr., LLC, Pakravan Living Trust, Hamid Esmail, and Farsaa, Inc.

# **EXHIBIT B**

# Exhibit F

## Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
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January 31, 2022

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

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

Fed. I.D. No. 61-1421786  
Invoice No. 6621139

Legal Fees for the period October 2021	\$13,026.00
Expenses Disbursed	\$0.00
<b>Due this Invoice</b>	<b>\$13,026.00</b>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Asset Disposition</u>			
10/1/2021	KBD	0.90	Confer with M. Rachlis regarding intervenor appeal and study related briefs (6949 Merrill; 7600 Kingston; 7656 Kingston) (.4); confer with SEC and J. Wine (6949 Merrill; 7600 Kingston; 7656 Kingston) (.1); attention to documents for closing (1102 Bingham) (.2); review information regarding contract and sale prices for properties (all) (.2).
			Asset Disposition
10/4/2021	KBD	0.70	Work with J. Rak on closing documents (1102 Bingham) (.4); study correspondence relating to closing (1102 Bingham) (.3).
			Asset Disposition
10/5/2021	KBD	0.80	Exchange correspondence with A. Porter regarding closing (1102 Bingham) (.2); study and revise motion to dismiss appeal (6949 Merrill; 7600Kingston; 7656 Kingston) (.6).
			Asset Disposition
10/6/2021	KBD	0.30	Exchange correspondence regarding motion to dismiss appeal (6949 Merrill; 7600 Kingston; 7656 Kingston) (.1); exchange correspondence regarding closing of property sale and termination of insurance (1102 Bingham) (.2).
			Asset Disposition
10/7/2021	KBD	1.40	Study revised motion to dismiss appeal (6949 Merrill; 7600 Kingston;7656 Kingston) (1.0); exchange correspondence with A. Porter, M. Rachlis, and J. Wine regarding appeal strategy (6949 Merrill; 7600 Kingston; 7656 Kingston) (.3); exchange correspondence regarding sale of property (1102 Bingham) (.1).
			Asset Disposition
10/8/2021	KBD	0.80	Confer with A. Porter, M. Rachlis, and J. Wine regarding issues relating to appeal (6949 Merrill; 7600 Kingston; 7656 Kingston).
			Asset Disposition
10/11/2021	KBD	1.50	Study and revise motion to dismiss appeal (6949 Merrill; 7600 Kingston; 7656 Kingston).
			Asset Disposition
10/12/2021	KBD	0.60	Exchange correspondence regarding motion to dismiss appeal (7600 Kingston; 7656 Kingston; 6949 Merrill) (.4); revise draft motion to dismiss (.2).
			Asset Disposition
10/13/2021	KBD	0.70	Work on closing documents (638 Avers) (.3); work on motion to dismiss appeal and exchange various related correspondence (7600 Kingston; 7656 Kingston; 6949 Merrill) (.4).
			Asset Disposition

Date	Indiv	Hours	Description		
10/15/2021	KBD	0.30	Attention to closing issues and exchange related correspondence (638 Avers). Asset Disposition		
10/17/2021	KBD	0.20	Exchange correspondence with J. Rak and A. Porter regarding property sale accounting reconciliation (all). Asset Disposition		
10/19/2021	KBD	0.10	Exchange correspondence with claimant's counsel regarding closing and property manager expenses (638 Avers). Asset Disposition		
10/28/2021	KBD	0.30	Study inventor-appellant response to motion to dismiss appeal and exchange related correspondence (7600 Kingston, 7656 Kingston, 6949 Merrill). Asset Disposition		
SUBTOTAL:				[ 8.60	3354.00]

Business Operations

10/1/2021	KBD	0.10	Attention to property expense issue (638 Avers). Business Operations		
10/4/2021	KBD	0.20	Attention to dismissal of state court action (3074 Cheltenham) (.1); attention to resolution of water meter issue (638 Avers) (.1). Business Operations		
10/8/2021	KBD	0.30	Study and revise settlement release and exchange related correspondence with J. Wine (7110 Cornell). Business Operations		
10/12/2021	KBD	0.20	Attention to potential repair and exchange related correspondence with asset manager (7109 Calumet). Business Operations		
10/13/2021	KBD	0.20	Exchange correspondence with asset manager and property manager regarding property improvement expense to maintain CHA status (7109 Calumet). Business Operations		

Date	Indiv	Hours	Description
10/14/2021	KBD	0.10	Attention to communication with insurer regarding settlement (7110 Cornell). Business Operations
10/15/2021	KBD	0.30	Attention to communication with J. Wine and insurance adjuster regarding settlement (7110 Cornell) (.2); exchange correspondence regarding termination of insurance (1102 Bingham) (.1). Business Operations
10/18/2021	KBD	0.10	Exchange correspondence regarding trial in state court action (7748 Essex). Business Operations
10/21/2021	KBD	0.30	Study motion to intervene and exchange related correspondence (defer). Business Operations
10/25/2021	KBD	0.30	Confer with J. Wine regarding motion to intervene (defer) (.1); confer with J. Wine and E. Duff regarding state court matter (6160 MLK) (.2). Business Operations
10/26/2021	KBD	1.00	Telephone conference with SEC (defer) (.1); telephone conferences with A. Porter and M. Rachlis regarding motion to intervene (defer) (.8); further confer with A. Porter regarding motion to intervene and communication with intervenor's counsel (defer) (.1). Business Operations
10/29/2021	KBD	0.20	Exchange correspondence with property manager regarding utility invoices (6217 Dorchester) (.1); exchange correspondence regarding property expense issue (8517 S Vernon; 9610 S Woodlawn) (.1). Business Operations
10/31/2021	KBD	0.10	Exchange correspondence with A. Porter regarding draft order on motion to intervene (defer). Business Operations
SUBTOTAL:			[ 3.40                      1326.00]

Claims Administration & Objections

10/1/2021	KBD	1.20	Confer with M. Rachlis and J. Wine regarding claims analysis and discovery issues (Group 1) (.2); exchange correspondence with J. Wine regarding title company subpoena (all) (.1); further confer with K. J. Wine regarding claims (Group 1) (.2); confer with SEC (Group 1) (.5); draft correspondence to J. Wine regarding sole lien process procedures (sole lien)(.2). Claims Administration & Objections
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<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/4/2021	KBD	0.90	Attention to motion to compel and related communications (Group 1) (.1); exchange correspondence with A. Watychowicz and J. Wine regarding communications with claimants (all) (.2); confer with A. Porter and J. Wine regarding depositions (Group 1) (.3); legal research regarding claims issues (Group 1) (.3).  Claims Administration & Objections
10/5/2021	KBD	0.70	Confer with J. Wine regarding claims discovery issues (Group 1) (.6); exchange correspondence with A. Watychowicz regarding communication with claimants (all) (.1).  Claims Administration & Objections
10/6/2021	KBD	1.00	Confer with A. Porter and J. Wine regarding discovery for claims process (Group 1) (.5); exchange correspondence with J. Wine and A. Watychowicz regarding claimants' communications (all) (.1); email exchange with J. Wine and A. Watychowicz regarding supplemental discovery and communications with claimants (Group 1) (.1); study claimant discovery responses (Group 1) (.3).  Claims Administration & Objections
10/7/2021	KBD	0.30	Exchange correspondence with J. Wine regarding claimant document production issues (Group 1) (.2); exchange correspondence regarding communication with claimants (all) (.1).  Claims Administration & Objections
10/8/2021	KBD	0.60	Exchange correspondence with J. Wine regarding claimant production (Group 1) (.1); confer with J. Wine, A. Porter, and M. Rachlis regarding depositions (Group 1) (.2); study subpoena and exchange related correspondence (Group 1) (.3).  Claims Administration & Objections
10/11/2021	KBD	0.10	Attention to correspondence regarding claims vendor invoices (all).  Claims Administration & Objections
10/12/2021	KBD	1.20	Attention to communications with claimants related to protective order (Group 1) (.1); review correspondence from and related correspondence from A. Watychowicz (all) (.5); attention to voice message from claimant and response to same (defer) (.2); study revised joint motion to establish separate process for single claim properties (sole lien) (.3); exchange correspondence with J. Wine regarding draft subpoenas (Group 1) (.1).  Claims Administration & Objections



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/13/2021	KBD	0.50	Work on communication with claimant regarding claim issue (all) (.1); attention to claimant inquiries regarding claims process and exchange related correspondence (all) (.2); work on discovery issue (Group 1) (.1); work on single claim process issue and communication (sole lien) (.1).  Claims Administration & Objections
10/14/2021	KBD	0.30	Attention to claimant communications (all).  Claims Administration & Objections
10/15/2021	KBD	0.30	Exchange various correspondence regarding communications with claimants relating to claims process and discovery issues (all) (.2); attention to correspondence regarding deposition planning (Group 1) (.1).  Claims Administration & Objections
10/18/2021	KBD	1.10	Confer with J. Wine and M. Rachlis regarding claims work, potential avenues for claims resolution, and discovery issues (Group 1) (.8); review correspondence from A. Watychowicz regarding depositions (Group 1) (.1); study correspondence from J. Wine regarding rollover issue (all) (.1); exchange correspondence regarding communication with claimant (all) (.1).  Claims Administration & Objections
10/19/2021	KBD	0.30	Attention to claimant communication and review related correspondence from A. Watychowicz (Group 1) (.1); exchange correspondence with J. Wine regarding deposition (Group 1) (.1); exchange correspondence with J. Wine regarding single claim process (sole lien) (.1).  Claims Administration & Objections
10/20/2021	KBD	0.30	Telephone conference with J. Wine regarding discovery planning and approach to depositions and communication with claimant (Group 1) (.2); study correspondence from J. Wine regarding claims analysis (7024 Paxton) (.1).  Claims Administration & Objections
10/21/2021	KBD	0.40	Exchange correspondence regarding EB records vendor invoices (all) (.2); attention to communication with claimants regarding claims issue (all) (.2).  Claims Administration & Objections
10/22/2021	KBD	0.30	Review correspondence regarding rollover issues (all) (.1); attention to communication with claimants (all) (.2).  Claims Administration & Objections

Date	Indiv	Hours	Description
10/23/2021	KBD	0.10	Exchange correspondence with A. Porter regarding depositions (Group 1). Claims Administration & Objections
10/25/2021	KBD	0.20	Confer with J. Wine regarding deposition (Group 1) (.1); attention to property issue (7749 Yates) (.1). Claims Administration & Objections
10/26/2021	KBD	0.90	Exchange correspondence and telephone conference with J. Wine and M. Rachlis regarding investor claimant depositions and hearing before Judge Kim (Group 1) (.6); telephone conference with SEC (defer) (.2); attention to claimantscommunications and relationship with EquityBuild (all) (.1). Claims Administration & Objections
10/27/2021	KBD	1.50	Prepare for and attend hearing before Judge Kim on motion to compel (Group 1) (.5); confer with J. Wine regarding hearing before Judge Kim and claimants' depositions (Group 1) (.7); exchange correspondence regarding depositions and noticing party (Group 1) (.2); attention to claimant communications (.1). Claims Administration & Objections
10/28/2021	KBD	4.30	Work on sole lien process and exchange various related correspondence (sole lien) (3.5); telephone conference with SEC (sole lien) (.2); telephone conference with A. Watychowicz regarding record relating to single claim process (sole lien) (.2); communicate with A. Watychowicz regarding response to claimant (defer) (.1); confer with A. Watychowicz regarding claims process and related issues (sole lien) (.1); telephone conference with J. Wine regarding depositions (Group 1) (.2). Claims Administration & Objections
10/29/2021	KBD	2.30	Work on sole lien process joint motion and exhibit describing proposed process, and exchange various related correspondence (sole lien) (2.1); telephone conference with SEC (sole lien) (.2). Claims Administration & Objections
SUBTOTAL:			[18.80            7332.00]

#### Status Reports

10/13/2021	KBD	0.20	Study correspondence and list for status report preparation (.1). exchange correspondence with J. Wine regarding preparation of status report (.1). Status Reports
10/21/2021	KBD	0.10	Study correspondence from J. Wine regarding status update (all). Status Reports

Date	Indiv	Hours	Description		
10/24/2021	KBD	0.40	Study and revise status report. Status Reports		
10/25/2021	KBD	0.30	Study and revise status report (.2); confer and exchange correspondence with J. Wine regarding status report (.1). Status Reports		
10/28/2021	KBD	0.20	Review and exchange correspondence regarding state court action. Status Reports		
SUBTOTAL:				[ 1.20	468.00]

Tax Issues

10/13/2021	KBD	0.10	Exchange correspondence with tax administrator regarding 2020 tax returns. Tax Issues		
10/25/2021	KBD	0.10	Review correspondence regarding IRS notice and communication. Tax Issues		
10/27/2021	KBD	0.20	Review and exchange correspondence regarding IRS notices. Tax Issues		
10/28/2021	KBD	1.00	Exchange correspondence with and telephone conference with tax professionals regarding potential tax issue (sole lien). Tax Issues		
SUBTOTAL:				[ 1.40	546.00]

33.40 \$13,026.00

Summary of Activity

	Hours	Rate	
Kevin B. Duff	33.40	390.00	\$13,026.00

**SUMMARY**

Legal Services	\$13,026.00
Other Charges	\$0.00
<b>TOTAL DUE</b>	<b>\$13,026.00</b>

# Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
SUITE 900  
CHICAGO, ILLINOIS 60605

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

January 28, 2022

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

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

Fed. I.D. No. 61-1421786  
Invoice No. 6621140

Legal Fees for the period November 2021	\$13,416.00
Expenses Disbursed	\$0.00
<b>Due this Invoice</b>	<b>\$13,416.00</b>

Date      Indiv Hours Description

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Asset Analysis & Recovery

11/17/2021 KBD 0.10 Exchange correspondence with J. Wine regarding potential asset.

Asset Analysis & Recovery

SUBTOTAL:

[ 0.10                      39.00]

Asset Disposition

11/16/2021 KBD 0.40 Exchange correspondence with J. Wine regarding lender's termination of sale contract and need to re-sell property (7109 Calumet) (.1); telephone conference with real estate broker regarding need to re-sell property (7109 Calumet) (.2); telephone conference with A. Porter regarding lender's termination of contract and need to re-sell property (7109 Calumet) (.1).

Asset Disposition

11/17/2021 KBD 0.20 Exchange correspondence with lender's counsel regarding termination of sale contract, sale process, and appraisal (7109 Calumet) (.1); confer with A. Porter regarding process for sale of property and draft correspondence regarding publication of notice (7109 Calumet) (.1).

Asset Disposition

11/18/2021 KBD 0.80 Confer with real estate broker, A. Porter, and J. Rak regarding planning for marketing and sale of property (7109 Calumet) (.5); exchange correspondence with real estate broker regarding list price analysis and recommendation (7109 Calumet) (.1); exchange various additional correspondence relating to marketing and sale effort (7109 Calumet) (.2).

Asset Disposition

11/23/2021 KBD 0.20 Exchange correspondence regarding intervenor planned motion to request final order (7600 Kingston; 7656 Kingston; 6949 Merrill).

Asset Disposition

11/24/2021 KBD 0.30 Study intervenor motion for a final order and exchange related correspondence (7600 Kingston; 7656 Kingston; 6949 Merrill).

Asset Disposition

SUBTOTAL:

[ 1.90                      741.00]

Business Operations

11/1/2021 KBD 1.00 Study proposed draft stipulation on motion to intervene and exchange related correspondence (defer) (.5); telephone conference with SEC (defer) (.1); attention to notice from collection firm regarding unpaid gas bill and exchange related correspondence with K. Pritchard (4611 Drexel) (.2); attention to funds from insurance carrier for settlement of personal injury claim (7110 Cornell) (.2).

Business Operations

Date	Indiv	Hours	Description
11/3/2021	KBD	0.30	Exchange correspondence with K. Pritchard regarding communication with property manager relating to unpaid gas bill (4611 Drexel) (.1); exchange correspondence with A. Porter regarding motion to intervene, proposed stipulation, and communications with intervenor's counsel (defer) (.1); review and exchange correspondence with J. Wine regarding notice of violation (7834 Ellis) (.1).  Business Operations
11/5/2021	KBD	0.60	Exchange correspondence with K. Pritchard regarding insurance premium refunds (all) (.2); exchange correspondence with M. Rachlis and J. Wine regarding personal injury lawsuit relating to property claim (2450 E 78th) (.4).  Business Operations
11/8/2021	KBD	1.70	Study, revise, and exchange various related correspondence regarding intervenors' motion and joint stipulation in order (defer).  Business Operations
11/10/2021	KBD	0.10	Exchange correspondence with K. Pritchard regarding insurance premium refunds.  Business Operations
11/11/2021	KBD	0.20	Work on issue regarding collection notice and exchange and revise related correspondence (4611 Drexel).  Business Operations
11/15/2021	KBD	0.30	Draft correspondence to J. Wine regarding state court action (4533 Calumet) (.2); review proposed stipulation relating to intervening motion (defer) (.1).  Business Operations
11/16/2021	KBD	0.40	Confer with and draft correspondence to J. Wine regarding state court complaint and review same (4533 Calumet).  Business Operations
11/18/2021	KBD	0.60	Exchange correspondence with J. Wine regarding state court action (4533 Calumet) (.4); draft correspondence to J. Wine and K. Pritchard regarding restoration motion (6160 MLK; 7201 Constance; 7051 Bennett; 7834 Ellis; 7749 Yates; 8201 Kingston; 5001 Drexel; 2909 E 78th; 7210 Vernon; 7109 Calumet; 6825 Indiana; 6554 Rhodes; 1414 E 62nd) (.2).  Business Operations

Date	Indiv	Hours	Description
11/19/2021	KBD	0.20	Exchange correspondence with J. Wine regarding procedural options for state court action (4533 Calumet) (.1); exchange correspondence with property manager regarding property expenses and final accounting (638 Avers) (.1).  Business Operations
11/21/2021	KBD	0.70	Exchange correspondence with A. Porter and M. Rachlis regarding motion to intervene, proposed stipulation, and objections to motion and study and revise draft opposition to motion (defer).  Business Operations
11/22/2021	KBD	0.80	Draft correspondence to K. Pritchard and J. Rak and property manager regarding property expenses (638 Avers) (.1); exchange correspondence regarding opposition to motion to intervene and review and revise same (defer) (.7).  Business Operations
11/23/2021	KBD	0.60	Telephone conference with SEC (defer) (.2); exchange correspondence with M. Rachlis and A. Porter regarding intervenors' motion and attempts to resolve objections (defer) (.2); exchange correspondence with J. Wine and K. Pritchard regarding payment of settlement (7110 Cornell) (.1); study correspondence from J. Wine regarding communication with insurance broker (4533 Calumet) (.1).  Business Operations
11/24/2021	KBD	0.30	Exchange correspondence with M. Rachlis and J. Wine regarding intervenors' motion and study revisions to draft stipulation (defer).  Business Operations
11/29/2021	KBD	0.10	Attention to settlement payment (7110 Cornell).  Business Operations
11/30/2021	KBD	0.10	Exchange correspondence regarding utility bill (1401 W 109th).  Business Operations
SUBTOTAL:			[ 8.00                      3120.00]

Claims Administration & Objections

11/1/2021	KBD	2.00	Exchange correspondence regarding communication with claimant regarding claims process timing and representation by counsel (all) (.2); attention to communication from claimants regarding claims (all) (.1); exchange correspondence with J. Wine regarding communication with Group 1 claimants (Group 1) (.2); study claimant motion to disclose expert, study related case law, and exchange various related correspondence (Group 1) (1.5).  Claims Administration & Objections
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Date	Indiv	Hours	Description
11/2/2021	KBD	1.20	Attention to communication with various claimants and exchange related correspondence with A. Watychowicz (all) (.5); attention to correspondence with Court regarding potential for settlement discussions and exchange related correspondence (Group 1) (.3); telephone conference with SEC (Group 1) (.3); confer with J. Wine regarding Court order on expert disclosure (Group 1) (.1).  Claims Administration & Objections
11/3/2021	KBD	0.30	Telephone conferences with J. Wine and attention to correspondence regarding depositions (Group 1).  Claims Administration & Objections
11/4/2021	KBD	1.00	Confer with team regarding deposition testimony of title company representative and related issues and analysis (Group 1) (.8); attention to communication from claimant (all) (.1); exchange correspondence regarding deposition transcripts (Group 1) (.1).  Claims Administration & Objections
11/5/2021	KBD	0.70	Work on correspondence with various claimants regarding claims and claims process (all) (.5); exchange correspondence with J. Wine regarding potential set-off issue (all) (.2).  Claims Administration & Objections
11/7/2021	KBD	0.50	Study and revise motion to modify claims process schedule (Group 1) (.3); draft correspondence regarding motion to modify claims process schedule (Group 1) (.2).  Claims Administration & Objections
11/8/2021	KBD	2.50	Study numerous revisions to, and telephone conferences and exchange various correspondence regarding claims process schedule (Group 1) (2.0); work on communications with claimants regarding claims, claims process, and potential distribution (all) (.4); attention to deposition transcripts (Group 1) (.1).  Claims Administration & Objections
11/9/2021	KBD	0.20	Exchange correspondence with M. Rachlis and J. Wine regarding claims process scheduling order and communications with participants (Group 1).  Claims Administration & Objections
11/10/2021	KBD	0.70	Confer with M. Rachlis regarding schedule, expert discovery, disclosures, and upcoming hearing (Group 1) (.4); attention to review of claim and related communication (all) (.3).  Claims Administration & Objections

Date	Indiv	Hours	Description
11/11/2021	KBD	1.50	Telephone conferences and exchange correspondence regarding claims schedule (Group 1) (.7); telephone conference with SEC (Group 1) (.2); attention to further communications with J. Wine regarding Group 1 schedule (Group 1) (.1); study records regarding investor buyout history (all) (.5).  Claims Administration & Objections
11/12/2021	KBD	0.40	Telephone conference with SEC (Group 1) (.3); exchange correspondence with A. Watychowicz regarding communication with claimant related to representation issue (all) (.1).  Claims Administration & Objections
11/14/2021	KBD	1.00	Study and revise draft disclosure and draft related correspondence to J. Wine and M. Rachlis (Group 1).  Claims Administration & Objections
11/15/2021	KBD	2.50	Confer with M. Rachlis, A. Porter, and J. Wine regarding analysis of potential avoidance disclosures (Group 1) (1.3); exchange with A. Watychowicz regarding email from IRA custodian (defer) (.1); confer with A. Watychowicz regarding communication with claimants (Group 1) (.2); exchange correspondence with A. Watychowicz regarding communication with claimant regarding claim information (all) (.1); exchange correspondence with J. Wine and K. Pritchard regarding claimant and claim (Group 1) (.2); study revisions to draft disclosure and exchange related correspondence with M. Rachlis and J. Wine (Group 1) (.6).  Claims Administration & Objections
11/16/2021	KBD	1.50	Telephone conference with SEC (Group 1) (.4); telephone conference with SEC (sole lien) (.1); attention to communication with claimants (all) (.3); telephone conference with J. Wine and M. Rachlis regarding preparation for hearing (sole lien) (.2); telephone conference with J. Wine and M. Rachlis regarding draft disclosure (Group 1) (.2); study correspondence from K. Pritchard regarding claimant information (Group 1) (.2); draft correspondence regarding potential issue impacting claims analysis and distribution (all) (.1).  Claims Administration & Objections
11/17/2021	KBD	2.10	Prepare for hearing before Judge Lee (sole lien) (.3); confer with M. Rachlis and J. Wine regarding sole lien process and hearing before Judge lien (sole lien) (1.2); attention to expert discovery (Group 1) (.1); attention to communication with claimant regarding hearing, schedule, and communications (all) (.2); study revised disclosure and exchange related correspondence with J. Wine (Group 1) (.3).  Claims Administration & Objections

Date	Indiv	Hours	Description
11/18/2021	KBD	2.30	Confer with M. Rachlis regarding hearing before Judge Lee and sole lien process (sole lien) (.1); appear before Judge Lee regarding sole lien process (sole lien) (1.0); confer with M. Rachlis regarding hearing and process (sole lien) (.1); further telephone conference with M. Rachlis and J. Wine regarding hearing and process (Group 1) (.5); work on communication with claimant (all) (.1); work on disclosure and related correspondence (Group 1) (.3); review draft position statement template and exchange correspondence with J. Wine regarding revisions (.2).  Claims Administration & Objections
11/19/2021	KBD	0.40	Exchange correspondence with J. Wine regarding proposed order on claims process (Group 1) (.2); exchange correspondence with claimant's counsel regarding third party subpoenas (sole lien) (.1); exchange correspondence with A. Watychowicz regarding order and discovery schedule (sole line) (.1).  Claims Administration & Objections
11/21/2021	KBD	0.50	Study client history and analysis of investments and draft related correspondence to J. Wine (all).  Claims Administration & Objections
11/23/2021	KBD	0.50	Telephone conference with SEC (Group 1) (.1); exchange correspondence with A. Porter and J. Wine regarding expert discovery (Group 1) (.1); attention to communication with claimant (all) (.1); study draft riders to third party subpoena and related correspondence (sole lien) (.2).  Claims Administration & Objections
11/24/2021	KBD	0.20	Study revisions to third party subpoenas and exchange related correspondence (sole lien).  Claims Administration & Objections
11/27/2021	KBD	0.20	Draft correspondence to J. Wine regarding records from EB documents database (all).  Claims Administration & Objections
11/29/2021	KBD	0.40	Confer with J. Wine regarding single claim process (sole lien) (.2); confer with J. Wine and M. Rachlis regarding revisions to subpoenas (sole lien) (.2).  Claims Administration & Objections
11/30/2021	KBD	0.90	Telephone conference with A. Porter and J. Wine regarding subpoenas to loan originators and title companies (sole lien) (.6); further communicate with M. Rachlis and J. Wine regarding subpoenas (sole lien) (.2); exchange correspondence with A. Watychowicz regarding communication from claimant and request for records (all) (.1).  Claims Administration & Objections

Date Indiv Hours Description

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SUBTOTAL: [ 23.50 9165.00]

Status Reports

11/1/2021 KBD 0.20 Exchange correspondence regarding preparation and filing of status report.

Status Reports

SUBTOTAL: [ 0.20 78.00]

Tax Issues

11/1/2021 KBD 0.10 Exchange correspondence regarding tax notices.

Tax Issues

11/8/2021 KBD 0.20 Draft correspondence to J. Wine and accounting firm representative regarding tax notices.

Tax Issues

11/12/2021 KBD 0.20 Exchange correspondence with K. Pritchard regarding tax authority collection notices.

Tax Issues

11/16/2021 KBD 0.10 Exchange correspondence with K. Pritchard regarding collection notices.

Tax Issues

11/30/2021 KBD 0.10 Exchange correspondence with K. Pritchard regarding collection notices from tax authority.

Tax Issues

SUBTOTAL: [ 0.70 273.00]

Hours  
34.40      \$13,416.00

Summary of Activity

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	<u>Hours</u>	<u>Rate</u>	
Kevin B. Duff	34.40	390.00	\$13,416.00

**SUMMARY**

Legal Services	\$13,416.00
Other Charges	\$0.00
<b>TOTAL DUE</b>	<b>\$13,416.00</b>

## Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
SUITE 900  
CHICAGO, ILLINOIS 60605

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

January 28, 2022

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

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

Fed. I.D. No. 61-1421786  
Invoice No. 6621141

Legal Fees for the period December 2021	\$7,605.00
Expenses Disbursed	\$0.00
<b>Due this Invoice</b>	<b>\$7,605.00</b>

Date      Indiv Hours Description

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Asset Analysis & Recovery

12/6/2021	KBD	0.10	Exchange correspondence regarding bank account and related analysis (4533 Calumet).  Asset Analysis & Recovery
12/8/2021	KBD	0.10	Exchange correspondence with K. Pritchard and J. Wine regarding subpoena to third party (defer).  Asset Analysis & Recovery
12/9/2021	KBD	0.10	Exchange correspondence with J. Wine regarding subpoena (defer).  Asset Analysis & Recovery
12/14/2021	KBD	0.60	Confer with K. Pritchard regarding issue relating to bank accounts (defer) (.1); telephone conference with government representatives and J. Wine (defer) (.5).  Asset Analysis & Recovery
12/15/2021	KBD	0.10	Exchange correspondence with K. Pritchard regarding transfer of funds to Receivership account (defer).  Asset Analysis & Recovery

SUBTOTAL:

[ 1.00                      390.00]

Asset Disposition

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12/6/2021	KBD	0.40	Study offering memorandum (7109 Calumet) (.2); exchange correspondence with claimant's counsel, K. Pritchard, and J. Wine regarding post-sale fund balances for properties (1516 E 85th; 2136 W 83rd; 7922 Luella; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8529 Rhodes; 11318 Church; 1017 W 102nd; 417 Oglesby; 7925 Kingston; 8403 Aberdeen; 8405 Marquette; 8800 Ada; 9212 Parnell; 10012 LaSalle; 3723 W 68th; 406 E 87th; 61 E 92nd; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8432 Essex; 8517 Vernon; 3213 Throop; 6554 Rhodes; 6825 Indiana; 8346 Constance; 7210 Vernon; 6759 Indiana; 2129 W 71st; 5437 Laflin; 8209 Ellis; 8107 Ellis; 7300 St Lawrence; 7760 Coles; 8000 Justine; 8214 Ingleside; 9610 Woodlawn; 1401 W 109th; 310 E 50th; 6807 Indiana) (.2).  Asset Disposition
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<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/7/2021	KBD	0.20	Exchange correspondence with J. Wine and J. Rak regarding analysis of property account funds (single family).  Asset Disposition
12/10/2021	KBD	1.20	Confer with J. Wine, J. Rak, A. Porter regarding single family home portfolio closing cost allocation and study various related communications and valuation allocation spreadsheets (single family).  Asset Disposition
12/11/2021	KBD	0.60	Study draft response to intervenor motion for Rule 54(b) ruling (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition
12/13/2021	KBD	0.30	Exchange correspondence with M. Rachlis regarding intervenor motion for Rule 54(b) ruling and study changes to draft response (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition
12/17/2021	KBD	0.70	Study offers to purchase property (7109 Calumet) (.2); confer with real estate broker and A. Porter regarding offers to purchase property and strategy for responding to same (7109 Calumet) (.5).  Asset Disposition
12/18/2021	KBD	0.20	Study summary of offers to purchase property (7109 Calumet).  Asset Disposition
12/20/2021	KBD	1.00	Confer and exchange correspondence with real estate broker, M. Rachlis, and A. Porter regarding offers from potential purchasers and related strategy (7109 Calumet) (.3); exchange correspondence with real estate broker regarding offers to purchase property (7109 Calumet) (.3); work on notice to institutional lender of highest bid (7109 Calumet) (.2); review draft opposition to motion and exchange related correspondence (6949 Merrill; 7600 Kingston; 7656 Kingston) (.2).  Asset Disposition
12/22/2021	KBD	0.20	Review correspondence from lender's counsel regarding declination of opportunity to credit bid, exchange related correspondence, and attention to motion to approve sale (7109 Calumet).  Asset Disposition
12/23/2021	KBD	0.30	Attention to execution of sale agreement, preparation of motion to approve sale, and exchange of various related correspondence (7109 Calumet).  Asset Disposition
12/28/2021	KBD	0.30	Exchange correspondence with J. Wine regarding sale of property and motion to approve (7109 Calumet) (.1); review draft motion to confirm sale of property (7109 Calumet) (.2).  Asset Disposition

Date	Indiv	Hours	Description
12/29/2021	KBD	0.80	Work on motion to approve sale of property and exchange various related correspondence (7109 Calumet) (.5); draft correspondence to and telephone conference with A. Watychowicz regarding draft motion to approve sale and exhibits (7109 Calumet) (.3).  Asset Disposition
12/30/2021	KBD	2.70	Draft, revise, and study further revisions on motion to approve sale of property and exchange various related correspondence (7109 Calumet) (2.5); study correspondence from institutional lender's bank, exchange related correspondence with M. Rachlis, and draft correspondence to lender's bank regarding lender's termination of agreement to purchase property (7109 Calumet) (.2).  Asset Disposition
12/31/2021	KBD	0.10	Attention to communications with institutional lender's bank regarding lender's termination of agreement to purchase property (7109 Calumet).  Asset Disposition
SUBTOTAL:			[ 9.00            3510.00]

Business Operations

12/3/2021	KBD	0.10	Exchange correspondence regarding notice to collections firm (defer).  Business Operations
12/22/2021	KBD	0.20	Study and exchange correspondence related to trial in state court action (7748 Essex).  Business Operations
12/28/2021	KBD	0.60	Exchange correspondence regarding insurance premiums and allocation issues (all) (.2); exchange correspondence regarding preparation of motion for restoration of funds (all) (.4).  Business Operations
12/29/2021	KBD	0.10	Attention to communication regarding state court action (4533 Calumet).  Business Operations
12/30/2021	KBD	0.20	Study correspondence regarding insurance premium issues (all).  Business Operations
SUBTOTAL:			[ 1.20            468.00]

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Case Administration</u>			
12/7/2021	KBD	0.30	Telephone conference with bank representative regarding account issue.  Case Administration
12/9/2021	KBD	0.40	Confer with J. Rak regarding account statement review and reconciliation.  Case Administration
SUBTOTAL:			[ 0.70                      273.00]
<u>Claims Administration &amp; Objections</u>			
12/1/2021	KBD	0.60	Exchange correspondence with J. Wine and A. Watychowicz regarding communication with claimant regarding claims process issues (all) (.2); attention to and draft correspondence to claimant's counsel regarding claims process and hearing before Judge Lee (sole lien) (.1); study hearing transcript and exchange correspondence with J. Wine regarding claims process (sole lien) (.3).  Claims Administration & Objections
12/2/2021	KBD	0.60	Exchange correspondence with K. Pritchard regarding communication with claimant relating to estate issue (all) (.2); exchange correspondence regarding notice to collections firm (all) (.1); exchange correspondence with A. Watychowicz regarding communication with claimants regarding discovery and claims process issues (all) (.1); exchange correspondence with J. Wine regarding communication with claimants' counsel regarding sole lien process (sole lien) (.2).  Claims Administration & Objections
12/3/2021	KBD	0.20	Exchange correspondence regarding communication with claimants (all) (.1); exchange correspondence with J. Wine regarding communication with claimants' counsel regarding sole lien process (sole lien) (.1).  Claims Administration & Objections
12/6/2021	KBD	0.10	Exchange correspondence with A. Watychowicz regarding communication with claimant relating to claim (all).  Claims Administration & Objections
12/7/2021	KBD	0.10	Attention to communication with claimant (all).  Claims Administration & Objections
12/9/2021	KBD	0.60	Study expert report (Group 1) (.5); exchange correspondence with J. Wine regarding documents for use with Group 1 (Group 1) (.1).  Claims Administration & Objections

Date	Indiv	Hours	Description
12/10/2021	KBD	0.60	Study correspondence from J. Wine regarding expert report (Group 1) (.4); attention to third party discovery issue (sole lien) (.1); study claimant answers to discovery requests (sole lien) (.1).  Claims Administration & Objections
12/13/2021	KBD	0.20	Exchange correspondence with A. Watychowicz regarding response to claimant (Group 1) (.1); exchange correspondence with J. Wine regarding analysis of claims against funds (single family) (.1).  Claims Administration & Objections
12/20/2021	KBD	0.70	Confer with A. Porter and M. Rachlis regarding expert deposition (Group 1) (.2); telephone conference with J. Wine regarding expert deposition (Group 1) (.1); confer with A. Porter, J. Wine, and M. Rachlis regarding expert deposition and claims issues (Group 1) (.4).  Claims Administration & Objections
12/22/2021	KBD	0.30	Attention to correspondence regarding communication with claimant's counsel regarding claims documents (4533 Calumet) (.1); exchange correspondence with J. Wine and M. Rachlis regarding document production and privilege issues raised by title company (sole lien) (.2).  Claims Administration & Objections
12/23/2021	KBD	0.90	Attention to communications with claimants (all) (.4); telephone conference with J. Wine regarding EB document review for claims process (all) (.3); exchange correspondence regarding position statement template (Group 1) (.2).  Claims Administration & Objections
12/27/2021	KBD	0.20	Telephone conference and exchange correspondence with J. Wine regarding EB records database and related claims process issues (all).  Claims Administration & Objections
12/28/2021	KBD	0.60	Confer with J. Wine regarding EB database access, claimant's request for extension, and cost issues (all) (.5); telephone conference with SEC (all) (.1).  Claims Administration & Objections
12/29/2021	KBD	0.50	Attention to communications with claimants regarding claims process (all) (.1); attention to extension of database access and related email exchanges (all) (.3); exchange correspondence regarding claimants' inquiry about valuation issue (all) (.1).  Claims Administration & Objections

Date	Indiv	Hours	Description
12/30/2021	KBD	0.40	Attention to communications with claimants regarding claims process and access to EB documents database (all).  Claims Administration & Objections

SUBTOTAL: [ 6.60 2574.00]

Tax Issues

12/1/2021	KBD	0.20	Exchange correspondence regarding tax authority issue (all).  Tax Issues
12/6/2021	KBD	0.20	Exchange correspondence regarding tax authority collection notices and related correspondence.  Tax Issues
12/8/2021	KBD	0.60	Exchange correspondence with J. Rak regarding compilation of information for tax professionals (Group 1; sole lien) (.5); draft correspondence to tax administrator (.1).  Tax Issues

SUBTOTAL: [ 1.00 390.00]

19.50 \$7,605.00

Summary of Activity

	Hours	Rate	
Kevin B. Duff	19.50	390.00	\$7,605.00

**SUMMARY**

Legal Services	\$7,605.00
Other Charges	\$0.00
<b>TOTAL DUE</b>	<b>\$7,605.00</b>

# Exhibit G

## Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
SUITE 900  
CHICAGO, ILLINOIS 60605

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

January 25, 2022

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

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

Fed. I.D. No. 61-1421786  
Invoice No. 6622139

Legal Fees for the period October 2021	\$50,709.00
Expenses Disbursed	\$1,417.67
<b>Due this Invoice</b>	<b>\$52,126.67</b>



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
<u>Accounting/Auditing</u>					
10/4/2021	KMP	1.90	Prepare schedules of receipts and disbursements for September for receiver's accounts (all).		
			Accounting/Auditing		
SUBTOTAL:				[ 1.90	266.00]
<u>Asset Disposition</u>					
10/1/2021	AEP	1.60	Communications with property manager regarding continued search for plumbing invoice associated with alleged water shut-off at receivership property, review invoice, and prepare e-mail to Chicago Water Department seeking assistance in revising faulty full payment certificate, and prepare e-mail to buyer's counsel regarding status of closing (638 Avers) (.2); prepare receiver's deed, FIRPTA, Form 1099-S, and closing figures for conveyance of receivership property, and numerous communications with title underwriter regarding local law issues (1102 Bingham) (.1.4).		
			Asset Disposition		
	AW	0.80	Review docket and pleadings related to dispute with third party and related email to K. Duff (6949 Merrill; 7600 Kingston; 7656 Kingston).		
			Asset Disposition		
	JR	1.80	Exchange correspondence with property management regarding post-closing reconciliation distributions (6554 Vernon; 4315 Michigan; 7600 Kingston; 7656 Kingston; 6250 Mozart; 310 E 50th; 6807 Indiana; 9610 Woodlawn; 7255 Euclid; 7237 S Bennett) (.2); exchange correspondence with K. Duff and A. Porter relating to execution of documents in preparation for closing (1102 Bingham) (.3); communication with City of Chicago water department regarding water charges and issues associated with same (638 Avers) (.1); communication with K. Duff requesting confirmation of contract and sale price for all EquityBuild properties related to allocations, confirm same and further communicate with K. Duff providing confirmation and discrepancies (all) (1.2).		
			Asset Disposition		
10/4/2021	AEP	1.60	Review latest seller documents received from title company in connection with closing of receivership property, update closing spreadsheet, revise receiver's deed, modify affidavit of title, communications with J. Rak and title underwriter regarding remaining closing issues (1102 Bingham) (.8); additional teleconference with title officer associated with conveyance of receivership property regarding survey endorsement charges, conflicting property tax delinquency figures, pre-acquisition charges likely paid, and other settlement-related issues (1102 Bingham) (.4); teleconferences with City of Chicago utility billing department regarding issuance of amended full payment certificate associated with conveyance of receivership property, prepare e-mail to team regarding outcome, and prepare e-mail to buyer's counsel regarding resolution and scheduling of closing (638 Avers) (.3); additional communications with title agent regarding closing of receivership property and		

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			prepare e-mail to K. Duff regarding execution of settlement statement with signature addendum (1102 Bingham) (.1).
			Asset Disposition
10/4/2021	JR	2.30	Review emails, communication with A. Porter and the title company regarding execution of documents in anticipation of closing, further communication with K. Duff regarding same, execute documents in anticipation for closing (1102 Bingham) (1.6); communication with K. Pritchard requesting confirmation of wire instructions related to sale of property (1102 Bingham) (.1); review settlement statement related to anticipated sale of property, regarding property tax balance and further confirm a discrepancy, exchange communication with A. Porter regarding same (1102 Bingham) (.6).
			Asset Disposition
	KMP	0.20	Communicate with J. Rak to confirm bank account information for upcoming closing (1102 Bingham).
			Asset Disposition
10/5/2021	MR	2.00	Work on draft motion to dismiss appeal related to three properties (6949 Merrill; 7600 Kingston; 7656 Kingston).
			Asset Disposition
10/6/2021	JR	0.30	Exchange communication with the title company requesting status update on closing of property and further communication with A. Porter requesting status of closing statement related to closing (1102 Bingham).
			Asset Disposition
	KMP	0.20	Review online bank records and communicate with J. Rak to confirm receipt of proceeds from property sale (1102 Bingham).
			Asset Disposition
	MR	0.20	Attention to draft motion to dismiss appeal (6949 Merrill; 7600 Kingston; 7656 Kingston).
			Asset Disposition
10/7/2021	AEP	0.30	Review correspondence from closing agent regarding final payoffs, review final settlement statement, and update master property tracking spreadsheet (1102 Bingham) (.1); read and respond to e-mails from M. Rachlis and K. Duff regarding relative merits of moving to dismiss appeal filed in connection with judicial order directing release of earnest money to receiver following default by prospective purchaser of receivership properties (7600 Kingston; 7656 Kingston; 6949 Merrill) (.2).
			Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/7/2021	JR	1.00	Exchange communication with A. Porter, K. Duff and the title company regarding the closing of property (1102 Bingham)(.9); communication with K. Pritchard, K. Duff and insurance broker regarding confirmation of closing (1102 Bingham) (.1).  Asset Disposition
	JRW	1.40	Review and revise draft motion to dismiss appeal and related correspondence with K. Duff and M. Rachlis (6949 Merrill; 7600 Kingston; 7656 Kingston) (.7); correspondence with A. Porter, K. Duff and M. Rachlis regarding appeal strategy (6949 Merrill; 7600 Kingston; 7656 Kingston) (.3); legal research relating to appeal issue (6949 Merrill; 7600 Kingston; 7656 Kingston) (.4).  Asset Disposition
	MR	1.20	Further review and work on draft motion to dismiss appeal and related communications with J. Wine, A. Porter, and K. Duff (6949 Merrill;7600 Kingston; 7656 Kingston).  Asset Disposition
10/8/2021	AEP	1.90	Conference call with K. Duff, M. Rachlis, and J. Wine regarding relative merits of moving to dismiss appeal filed in connection with disposition of earnest money associated with receivership properties (7600 Kingston; 7656 Kingston; 6949 Merrill) (.8); read and revise draft motion to dismiss appeal from order denying return of earnest money in connection with receivership properties (7600 Kingston; 7656 Kingston; 6949 Merrill) (1.1).  Asset Disposition
	JR	0.30	Communication with A. Porter requesting status of various information for anticipated closing (638 Avers) (.1); further communication with A. Watychowicz and S. Zjalic regarding completion of documents for anticipated closing (638 Avers) (.2).  Asset Disposition
	JRW	0.60	Conference with A. Porter, K. Duff and M. Rachlis regarding appeal strategy and planning (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition
	MR	0.80	Conferences regarding appeal issues with J. Wine. A. Porter and K. Duff related to appeal and related review of materials (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition
10/11/2021	JR	0.30	Communication with A. Watychowicz regarding signed closing document in anticipation for closing (638 Avers) (.1); communication with A. Porter and the title company requesting status update related to water certificate in anticipation for closing (638 Avers) (.2).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Asset Disposition
10/11/2021	JRW	0.20	Review and comment on redline of motion to dismiss appeal (6949 Merrill; 7600 Kingston; 7656 Kingston).
			Asset Disposition
10/12/2021	AEP	0.70	Read and revise latest draft of motion to dismiss appeal filed by defaulted prospective purchaser of receivership properties (7600 Kingston; 7656 Kingston; 6949 Merrill).
			Asset Disposition
	AW	0.20	Attention to draft motion to dismiss appeal and communication with counsel regarding requirements, timing for filing, and procedure (6949 Merrill; 7600 Kingston; 7656 Kingston).
			Asset Disposition
	JR	0.40	Review communication with property management company related to post-closing distributions for various properties and related request for status of post-closing distributions (6554 Vernon; 4315 Michigan; 7600 Kingston; 7656 Kingston; 6250 Mozart).
			Asset Disposition
	JRW	1.00	Review and revise motion to dismiss appeal and related correspondence with SEC (6949 Merrill; 7600 Kingston; 7656 Kingston) (.3); additional revision of motion and related legal research (6949 Merrill; 7600 Kingston; 7656 Kingston) (.7).
			Asset Disposition
	KMP	0.80	Attention to communication with property manager regarding transfer of funds for post-sale property reconciliations, review related bank records, update spreadsheet, and related email exchange with J. Rak (6554 Vernon; 4315 Michigan; 7600 Kingston; 7656 Kingston; 6250 Mozart; 310 E 50th; 6807 Indiana; 9610 Woodlawn; 7255 Euclid; 7237 Bennett).
			Asset Disposition
	MR	0.20	Attention to comments and exchanges regarding motion to dismiss (6949 Merrill; 7600 Kingston; 7656 Kingston).
			Asset Disposition
10/13/2021	AW	2.30	Revise draft motion to dismiss appeal, prepare table of contents, table of authorities, appearance and disclosure, and exhibits and related communication with counsel (6949 Merrill; 7600 Kingston; 7656 Kingston) (1.4); work on revisions to motion to dismiss appeal based on emails from counsel, finalize motion, and file with the Court (6949 Merrill; 7600 Kingston; 7656 Kingston) (.9).
			Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/13/2021	JR	2.00	Review, update and produce all the closing documents in anticipation of the Receiver's execution of documents and anticipated closing (638 Avers) (1.7); meeting with K. Duff relating to the execution of the closing documents in preparation for closing (638 Avers) (.3).  Asset Disposition
	JRW	0.30	Review additional redlines of motion to dismiss appeal (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition
	KMP	0.30	Attention to follow-up communication with property manager regarding transfer of funds for post-sale property reconciliations, review related bank records, update spreadsheet, and related email exchange with J. Rak (6554 Vernon; 7656 Kingston).  Asset Disposition
	MR	1.00	Work on appeal regarding properties and related follow up (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition
10/14/2021	AEP	0.20	Read latest correspondence from J. Rak regarding issues associated with preparation for conveyance of receivership property, revise seller's figures, and transmit same to title agent with comments regarding modifications (638 Avers).  Asset Disposition
10/15/2021	JR	2.20	Attend closing for property (638 Avers) (1.8); exchange communication with property management, real estate broker, insurance broker, accounting firm, K. Duff and K. Pritchard confirming closing details (638 Avers) (.3); further communication with property management requesting status update on water applications related to credit applied to water balance (638 Avers) (.1).  Asset Disposition
	JR	0.30	Update closed property spreadsheet (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East

Date	Indiv	Hours	Description
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End; 7750 Muskegon; 7201 Constance; 6160 S MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham) (.3).

Asset Disposition

10/18/2021	JR	0.20	Review email from K. Duff related to review of net proceeds, TI holdback and property management fees paid out of closing proceeds (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laffin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 S MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham) (.1); review email from J. Wine requesting closing documents related to the sale of property and provide same (638 Avers) (.1).
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Asset Disposition

10/27/2021	JR	3.90	Analysis and reconciliation of settlement statements related to individual banking property accounts (10012 LaSalle; 1017 W 102nd; 1050 8th Avenue (Naples, FL); 1102 Bingham; 11117 Longwood; 1131 E 79th; 11318 Church; 1401 W 109th; 1414 E 62nd; 1422 E 68th; 1516 E 85th; 1700 Juneway; 2129 W 71st; 2136 W 83rd; 2736 W 64th; 2800 E 81st; 2909 E 78th; 3030 E 79th; 3074 Cheltenham Place; 310 E 50th; 3213 Throop; 3723 W 68th; 406 E 87th; 417 Oglesby; 431 E 42nd; 4315 Michigan; 4520 Drexel; 4533 Calumet; 4611 Drexel; 4750 Indiana; 5001 Drexel; 5437 Laffin; 5450 Indiana; 5618 MLK; 5955 Sacramento; 6001 Sacramento; 61 E 92nd; 6160 MLK; 6217 Dorchester; 6250 Mozart; 6355 Talman; 6356 California; 638 Avers; 6437 Kenwood; 6554 Rhodes; 6554 Vernon; 6749 Merrill; 6759 Indiana; 6807 Indiana; 6825 Indiana; 6949 Merrill; 701 S 5th; 7024 Paxton; 7026 Cornell; 7051 Bennett; 7109 Calumet; 7110 Cornell).
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Asset Disposition

Date	Indiv	Hours	Description		
10/28/2021	AEP	0.20	Read opposition to motion to dismiss appeal associated with disposition of earnest money relating to receivership properties (7600 Kingston; 7656 Kingston; 6949 Merrill).		
			Asset Disposition		
	MR	0.20	Review response to motion to dismiss appeal (6949 Merrill; 7600 Kingston; 7656 Kingston).		
			Asset Disposition		
SUBTOTAL:				[35.40	8401.00]

Business Operations

10/4/2021	JRW	0.20	Review order of dismissal and related correspondence with property manager and K. Duff (3074 Cheltenham).		
			Business Operations		
10/5/2021	AW	0.40	Draft notice of receivership to creditor and related email exchanges with K. Duff regarding same (defer) (.3); attention to served subpoena and related email to J. Wine (all) (.1).		
			Business Operations		
10/6/2021	JRW	0.10	Correspondence to counsel for third-party regarding access to EquityBuild document database pursuant to subpoena and court order (defer).		
			Business Operations		
10/7/2021	AW	0.20	Attention to document production from financial institution and related email to J. Wine (defer).		
			Business Operations		
	JRW	1.20	Draft release for claim (7110 Cornell).		
			Business Operations		
10/8/2021	JRW	0.30	Exchange correspondence with counsel for personal injury plaintiff regarding release agreement (7110 Cornell) (.1); review redline of draft release agreement and forward draft release to property manager and insurer (7110 Cornell) (.2).		
			Business Operations		
10/14/2021	JRW	0.20	Exchange correspondence with counsel for personal injury plaintiff regarding executed settlement and release agreement (7110 Cornell) (.1); exchange correspondence with insurer regarding payment of settlement amount and related exchange with K. Duff (7110 Cornell) (.1).		
			Business Operations		

Date	Indiv	Hours	Description
10/15/2021	JRW	0.20	Exchange correspondence with K. Duff and insurer regarding logistics for payment of settlement amount (7110 Cornell).  Business Operations
10/19/2021	JRW	0.20	Confer with J. Rak regarding closing documentation (638 Avers) (.1); exchange correspondence with city counsel regarding municipal court matter (638 Avers) (.1).  Business Operations
10/25/2021	AW	0.20	Research emails regarding property and related email to K.Duff (7749 Yates).  Business Operations
	ED	0.20	Email correspondence with J. Rak and with accountant regarding information required to complete insurance reconciliation for properties sold in 2020 (1131 E 79th; 1700 Juneway; 2453 E 75th; 2736 W 64th; 4315 Michigan; 4520 Drexel; 4533 Calumet; 5450 Indiana; 5816 Martin Luther King; 6250 Mozart; 6355 Talman; 6437 Kenwood; 6554 Vernon; 6749 Merrill; 7051 S Bennett Avenue; 7110 Cornell; 7201 Constance; 7201 Dorchester; 7300 St Lawrence; 7442 Calumet; 7450 Luella; 7546 Saginaw; 7600 Kingston; 7749 Yates; 7760 Coles; 3074 Cheltenham; 7957 Marquette; 8000 Justine; 8047 Manistee; 8107 Ellis; 816 Marquette; 8201 Kingston; 8209 Ellis; 8214 Ingleside; 8326 Ellis; 8403 Aberdeen).  Business Operations
	JR	0.30	Review email from E. Duff related to property insurance endorsements, respond accordingly and organize all endorsements accordingly in electronic files (8047 Manistee; 7749 Yates; 6749 Merrill; 7450 Luella; 7546 Saginaw; 8201 Kingston; 4520 Drexel; 8326 Ellis; 8334 Ellis; 8342 Ellis; 8352 Ellis; 5450 Indiana; 6437 Kenwood; 7760 Coles; 8000 Justine; 8107 Ellis; 8214 Ingleside; 8209 Ellis; 11117 Longwood; 7300 St Lawrence; 7110 Cornell; 7957 Marquette; 7051 Bennett; 3074 Cheltenham; 2736 W 64th; 5618 S MLK; 6356 California; 6355 Talman; 7201 Constance; 6554 Vernon; 1700 Juneway; 7201 Dorchester; 7508 Essex; 431 E 42nd; 7701 Essex; 7442 Calumet; 816 Marquette; 6949 Merrill; 4533 Calumet; 4315 Michigan 7600 Kingston; 7656 Kingston; 1131 E 79th; 6250 Mozart).  Business Operations
	JR	1.00	Review email from A. Porter and K. Duff and begin analysis, reconciliation and organization of settlement statements related to separate property accounts regarding net proceeds, payments to property management and title indemnity holdbacks (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laffin; 6759 Indiana; 7300 St Lawrence; 7760



Date	Indiv	Hours	Description
			Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 S MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham).
			Business Operations
10/25/2021	JRW	0.20	Confer with K. Duff and E. Duff regarding correspondence from insurance carrier regarding state court matter and provide copy of release (6160 MLK).
			Business Operations
10/26/2021	AEP	0.90	Teleconferences with K. Duff and M. Rachlis regarding motion to intervene in connection with state court foreclosure litigation (defer) (.7); teleconference with counsel for intervenor regarding potential stipulation to resolve motion for leave to pursue state court foreclosure litigation (defer) (.2).
			Business Operations
	JR	1.10	Conduct analysis of missing property insurance endorsements, communication with accounting firm representative producing requested property insurance statements (6949 Merrill; 7549 Saginaw; 8201 Kingston; 7110 Cornell; 5618 MLK; 6356 California; 2736 W 64th; 7201 Constance; 11117 Longwood; 8403 Aberdeen; 6355 Talman) (.8); communication with account analyst requesting missing property endorsements (7110 Cornell; 5618 MLK; 6356 California; 7201 Constance; 11117 Longwood; 6355 Talman) (.3).
			Business Operations
	JR	0.90	Analysis, reconciliation and organization of settlement statements related to separate property accounts regarding net proceeds, payments to property management and title indemnity holdbacks (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laffin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250

Date	Indiv	Hours	Description
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Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 S MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham).

Business Operations

10/26/2021	MR	0.70	Telephone conference with K. Duff, J. Wine and SEC (defer) (.1); conferences with A. Porter and K.Duff regarding motion to intervene regarding properties that are not in receivership estate (defer) (.6).
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Business Operations

10/27/2021	JR	2.30	Follow up communication with account analyst requesting missing property insurance endorsements and review same (6949 Merrill; 7549 Saginaw; 8201 Kingston; 7110 Cornell; 5618 MLK; 6356 California; 2736 W 64th; 7201 Constance; 11117 Longwood; 8403 Aberdeen; 6355 Talman) (2.1); further communication with accounting firm representative producing requested property insurance statements (6949 Merrill; 7549 Saginaw; 8201 Kingston; 7110 Cornell; 5618 MLK; 6356 California; 2736 W 64th; 7201 Constance; 11117 Longwood; 8403 Aberdeen; 6355 Talman) (.2).
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Business Operations

10/31/2021	AEP	0.50	Review pleadings and prepare proposed stipulation and order partially granting motion to intervene (defer).
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Business Operations

SUBTOTAL:			[11.30	2469.00]
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Case Administration

10/11/2021	AW	0.70	Prepare pleadings and descriptions for update to web page (defer).
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Case Administration

10/12/2021	AW	0.40	Finish email regarding updates to web page and related email to IT support (defer).
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Case Administration

10/19/2021	AW	0.40	Attention to entered orders regarding motion to compel and granting extension, share with team, and update docket (.1); communicate with IT specialist regarding requested update to web page and related follow up email (.3).
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Case Administration

Date	Indiv	Hours	Description
10/26/2021	AW	0.20	Attention to entered order regarding motion to compel and update team (Group 1) (.1); request update to web page (Group 1) (.1).  Case Administration
SUBTOTAL:			[ 1.70                      238.00]

Claims Administration & Objections

10/1/2021	AW	0.50	Research regarding previously served subpoenas and responses and related email to J. Wine (sole lien).  Claims Administration & Objections
	JRW	1.50	Correspond with A. Watychowicz regarding documents produced pursuant to title company subpoena and related correspondence with K. Duff and claimants' counsel (sole lien) (.3); review invoices and vendor statement and follow up with K. Pritchard regarding same (all) (.2); confer with M. Rachlis and K. Duff regarding discovery planning (Group 1) (.2); several conferences with K. Duff regarding claims, hearing transcripts and appeal (.3); conference with SEC and K. Duff regarding discovery (Group 1) (.5).  Claims Administration & Objections
	KMP	0.20	Communications with J. Wine regarding payment of claims database vendor's invoices (all).  Claims Administration & Objections
	MR	1.40	Review materials to prepare for call on discovery (Group 1) (.4); meetings with K. Duff and J. Wine (Group 1) (.5); conferences with SEC, K. Duff and J. Wine (Group 1) (.5).  Claims Administration & Objections
10/4/2021	AEP	0.20	Teleconference with J. Wine regarding preparing for depositions (Group 1).  Claims Administration & Objections
	AW	1.40	Attention and responses to emails from claimants regarding status of claims process (all) (.3); email exchange with K. Duff and J. Wine regarding report of loss and related email to claimant (1131 E 79th) (.1); email exchange with J. Wine regarding review of standard discovery responses (Group 1) (.2); email and follow up call with J. Wine regarding submitted claim (6437 Kenwood) (.2); coordinate sharing of responses to subpoena with claimant's counsel (sole lien) (.2); draft letter to potential claimant regarding issue with his email and related email exchanges with K. Duff and J. Wine (6437 Kenwood) (.2); draft email to claimants regarding motion to compel and related communications with K. Duff and J. Wine (Group 1) (.2).  Claims Administration & Objections

Date	Indiv	Hours	Description
10/4/2021	JRW	3.30	Correspond with A. Watychowicz and K. Duff regarding responses to claimant inquiries and communications with claimants (all) (.4); work with A. Watychowicz on investor discovery responses (Group 1) (.4); exchange correspondence with claimants' counsel regarding document production (all) (.2); review motion to compel filed by claimant, exhibits thereto, and court order of referral (Group 1) (.4); telephone conference with claimant regarding motion to compel and related follow-up correspondence (Group 1) (.3); conference with A. Porter and K. Duff regarding depositions (Group 1) (.3); continued review of claimant's discovery in preparation for deposition (Group 1) (1.3).  Claims Administration & Objections
	MR	0.40	Attention to motion to compel and various related orders assigning matter (Group 1) (.3); attention to decisions regarding claims issues (all) (.1).  Claims Administration & Objections
10/5/2021	AW	2.30	Communicate with J. Wine regarding update to claimants about EB records database (all) (.2); revise sheets on review of discovery responses and produced documents (Group 1) (1.6); revise letter to claimant's counsel and related correspondence with J. Wine (Group 1) (.4); follow up regarding correspondence to claimant regarding email (6437Kenwood) (.1).  Claims Administration & Objections
	JRW	7.00	Review and revise letter to potential claimant (6437 Kenwood) (.2); review and compile potential deposition exhibits and work on deposition outline (Group 1) (4.3); conference with SEC (Group 1) (1.2); conference with K. Duff regarding potential depositions (Group 1) (.5); draft correspondence to claimant's counsel regarding discovery deficiencies (Group 1) (.4); exchange correspondence with A. Porter regarding interpretation of recorder's site (Group 1) (.2); review third-party subpoena for access to EquityBuild document database and related correspondence to vendor (defer) (.2).  Claims Administration & Objections
10/6/2021	AW	0.70	Communicate with K. Duff and J. Wine regarding response from claimant about tax issues (1131 E 79th) (.1); email exchange with K. Duff and J. Wine regarding supplemental discovery and communications with claimants (Group 1) (.2); work on claims group member list update (Group 1) (.1); communicate with J. Wine regarding revised list of emails (Group 1) (.1); attention to supplemental production from claimant and related communication with J. Wine (Group 1) (.2).  Claims Administration & Objections
	JRW	3.10	Conference with K. Duff and A. Porter regarding claimant discovery and related email regarding interrogatory answers (Group 1) (.5); exchange correspondence with vendor regarding compliance with court order (all) (.1); confer with A. Watychowicz and K. Duff regarding responses to claimants (all) (.2); study interrogatory answers (Group 1) (.4); conference call with SEC

Date	Indiv	Hours	Description
			and claimants' counsel regarding discovery (Group 1) (.8); prepare summary of discovery plan to team (Group1) (.1); compile and send pleadings and correspondence relating to privilege log to SEC (Group 1) (.3); conference call with A. Watychowicz regarding document production and notice issues (Group 1) (.3); correspondence from claimants' counsel to investor claimants regarding document productions (Group 1) (.1); correspondence with claimants' counsel and A. Watychowicz regarding supplemental document production, redactions, and re-subscribing to distribution list (Group 1) (.3).
			Claims Administration & Objections
10/6/2021	MR	0.20	Attention to various issues on discovery (Group 1).
			Claims Administration & Objections
10/7/2021	AEP	1.20	Read and analyze discovery responses in connection with claims process and read and respond to e-mails from J. Wine regarding discovery plans in connection with claims (Group 1).
			Claims Administration & Objections
	AW	0.40	Attention to exchanges between claimant and counsel and related email response (Group 1) (.1); attention to documents produced by title company and related email to J. Wine (Group 1) (.1); draft reminder for claimants regarding EB records database (all) (.2).
			Claims Administration & Objections
	JRW	0.70	Exchange correspondence with claimants' counsel and K. Duff regarding document production deficiencies (Group 1) (.3); draft response to claimant inquiry regarding discovery process (Group 1) (.1); exchange correspondence with A. Porter regarding subpoena (all) (.1); exchange correspondence with A. Porter regarding factual investigation (Group 1) (.1); review and revise draft email to claimants regarding database availability (all) (.1).
			Claims Administration & Objections
10/8/2021	AEP	0.30	Read and revise rider to subpoena in connection with claims associated with Group 1 (Group 1).
			Claims Administration & Objections
	AW	0.40	Communicate with A. Porter regarding response to subpoena and share received documents (Group 1) (.1); communicate with J. Wine regarding EB records database reminder to claimants (Group 1) (.1); attention to deposition subpoenas and update docket (Group 1) (.2).
			Claims Administration & Objections

Date	Indiv	Hours	Description
10/8/2021	JRW	2.60	Correspond with counsel for claimants regarding document production (Group 1) (.1); review draft subpoenas from claimants' counsel, prepare protocol for remote depositions, and related correspondence (Group 1) (1.3); conference with A. Porter, K. Duff and M. Rachlis regarding depositions and planning (Group 1) (.2); draft riders to 30(b)(6) subpoenas and related exchange of redlines and correspondence with A. Porter and SEC (Group 1) (.8); review court order granting motion to serve subpoena (all) (.1); further exchange of correspondence with A. Porter regarding discovery from title company (Group 1) (.1).  Claims Administration & Objections
	MR	0.50	Attention to discovery related issues (Group 1) (.3); conference with K. Duff, A. Porter and J. Wine regarding depositions (Group 1) (.2).  Claims Administration & Objections
10/11/2021	JRW	0.70	Confer with A. Porter regarding revisions to subpoena rider (Group 1) (.2); correspondence with SEC and claimants' counsel regarding revisions to subpoena rider (Group 1) (.1); confer with K. Pritchard regarding vendor invoice (all) (.1); correspondence with A. Porter regarding title companies (Group 1) (.1); telephone conferences with claimants' counsel regarding subpoenas (Group 1) (.2).  Claims Administration & Objections
	KMP	0.30	Communicate with K. Duff and J. Wine regarding claims database vendor's invoices and calculate amount paid to-date in connection with court-ordered fees (all).  Claims Administration & Objections
10/12/2021	AW	1.90	Communicate with K. Duff regarding claims communications and protective order (all) (.1); revision to claims service list (all) (.2); finalize and send out reminder regarding EB documents database expiration (all) (.3); attention to email and follow up from claimant regarding database and related communications with K. Duff and claimant (7301 Stewart; 7500 Eggleston; 3030 E 79th) (.2); attention to voicemail and email from claimant and related email (4611 Drexel; 4520 Drexel; 6751 Merrill; 7110 Cornell) (.1); attention to follow up from claimant regarding rollover, review claim, and communicate with K. Duff and J. Wine regarding potential update to claim (4611 Drexel; 4520 Drexel; 6751 Merrill; 7110 Cornell) (.3); attention to email from unknown email address, track down secondary email and related correspondence with J. Wine (all) (.2); attention to voice message from claimant regarding reporting of loss and exchange with K. Duff regarding proposed response letter (all) (.2); attention to claimant's request for claims files and prepare transfer of same (7026 Cornell) (.2); review updated address list for receivership properties (all) (.1).  Claims Administration & Objections

Date	Indiv	Hours	Description
10/12/2021	JRW	0.90	Email exchange with K. Duff and A. Watychowicz regarding confidentiality order (all) (.1); exchange various correspondence with SEC and claimants' counsel regarding 30(b)(6) deposition rider and deposition scheduling (Group 1) (.3); attention to numerous claimant email and voicemail inquiries (all) (.5).  Claims Administration & Objections
	KMP	0.30	Attention to communication with claimant regarding proof of claim, and related communications with K. Duff, J. Wine, and A. Watychowicz (defer).  Claims Administration & Objections
10/13/2021	AW	0.30	Communicate with K. Duff regarding claim abandonment option (1131 E 79th) (.1); communicate with K. Duff and J. Wine regarding master claims sheet (4611 Drexel; 4520 Drexel; 6751 Merrill; 7110 Cornell) (.1); email exchange with K. Duff and J. Wine regarding claimant's follow up regarding claims progress (Group 1) (.1).  Claims Administration & Objections
	JRW	1.80	Review and comment on draft correspondence and related correspondence with K. Duff, M. Rachlis, and SEC (Group 1) (.2); exchange correspondence with K. Duff and A. Watychowicz regarding claimant inquiries (all) (.3); confer with A. Watychowicz regarding claims database (all) (.1); telephone conference with counsel for claimants regarding claims process (all) (.2); review and comment on revised single claim process from claimants' counsel and related correspondence with M. Rachlis and K. Duff (sole lien) (1.0).  Claims Administration & Objections
	MR	0.90	Attention to privilege log issues for Group 1 based on claimant's positions (Group 1) (.2); follow up on single lien process (sole lien) (.7).  Claims Administration & Objections
10/14/2021	AW	0.70	Attention to communication and update mailing address as per claimant's request (all) (.1); finalize correspondence for claimant and related email (all) (.1); email claimant regarding progress in claims process (Group 1) (.1); review claim and communicate with K. Duff and J. Wine regarding responses to claimants (all) (.3); call with J. Wine regarding set claims process schedule (Group 1) (.1).  Claims Administration & Objections
	JRW	0.40	Attention to claimant inquiries (all) (.2); exchange correspondence with A. Watychowicz regarding supplemental document production (Group 1) (.1); review correspondence regarding privilege log (Group 1) (.1).  Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
10/15/2021	AW	0.60	Prepare claims documents and share same with claimant (7301 Stewart; 7500 Eggleston; 3030 E 79th) (.1); attention to deposition subpoenas directed to claimants, issues with service, and related exchange with J. Wine (Group 1) (.4); attention to voice messages from claimant and related email to claimant (1131 E 79th) (.1).  Claims Administration & Objections
	JRW	0.60	Exchange correspondence regarding 30(b)(6) deposition notices (Group 1) (.2); review notice of investor depositions and related correspondence with team (Group 1) (.2); exchange correspondence with M. Rachlis and K. Duff regarding claimant inquiry (all) (.1); work with A. Watychowicz to draft email to Group 1 claimants regarding deposition notices (Group 1) (.1).  Claims Administration & Objections
	MR	0.20	Follow up on claim inquiry (1131 E 79th) (.1); attention to issues on depositions (Group 1) (.1).  Claims Administration & Objections
10/17/2021	AEP	2.80	Read all e-mail correspondence from J. Wine, all judicial orders pertaining to discovery, including deposition rules, and begin reviewing e-mail correspondence relating to underwriting of loan to SSDF5 Portfolio 1 (Group 1).  Claims Administration & Objections
	JRW	0.40	Correspondence to team regarding upcoming depositions (Group 1).  Claims Administration & Objections
	MR	0.20	Attention to emails regarding discovery issues for claims (Group 1).  Claims Administration & Objections
10/18/2021	AW	1.50	Attention to served deposition notices and docket events (Group 1) (.3); communicate with J. Wine regarding responses to claimants' inquiries and related email responses (Group 1) (.2); review supplemental production from claimant and related communications with J. Wine (Group 1) (.6); re-add counsel for claimant to service list (Group 1) (.1); attention to email regarding limited discovery and related email to K. Duff (Group 1) (.1); reach out to claims vendor regarding claim form (all) (.1); communicate with counsel regarding service list and restrictions (Group 1) (.1).  Claims Administration & Objections



Date	Indiv	Hours	Description
10/18/2021	JRW	3.50	Exchange correspondence with claimants' counsel regarding distribution list (Group 1) (.1); review notices of depositions and work with A. Watychowicz regarding docketing (Group 1) (.1); correspondence with K. Duff and A. Watychowicz regarding claimant inquiry (Group 1) (.2); confer with A. Watychowicz regarding supplemental document production (Group 1) (.1); correspondence and telephone conference with K. Duff and M. Rachlis regarding claims and discovery (Group 1) (.8); research regarding proof of claim and related correspondence to K. Duff, A. Porter, and A. Watychowicz (all) (.4); conference call with claimants' counsel and counsel for SEC regarding 30(b)(6) deposition (Group 1) (.3); correspondence to team regarding upcoming depositions (Group 1) (.1); exchange correspondence regarding service of subpoena (Group 1) (.2); exchange correspondence with claimants' counsel regarding Group 1 service of deposition notices (Group 1) (.1); review investor discovery responses in preparation for upcoming depositions (Group 1) (.8); prepare analysis of Group 1 claims volume (Group 1) (.3).  Claims Administration & Objections
	MR	0.80	Conferences with K. Duff and J. Wine regarding claims work, potential avenues for claims resolution, and discovery issues, and attention to related emails (Group 1).  Claims Administration & Objections
10/19/2021	AW	1.80	Review discovery responses received from claimant and report to J. Wine (Group 1) (.5); review discovery responses and emails regarding claimants who are scheduled to be deposed (Group 1) (.4); communicate with J. Wine and K. Duff regarding claimant's email (Group 1) (.3); reach out to claimant with request to confirm prior communications and request to contact counsel (Group 1) (.1); re-add counsel for claimant to distribution list and confirm firm's emails are still listed (Group 1) (.1); review claims and contact information from claimants and email J. Wine (Group 1) (.2); supplement scheduled depositions events with court reporter information and docket deposition notice (Group 1) (.2).  Claims Administration & Objections
	JR	3.90	Review email from J. Wine regarding database research in preparation for upcoming depositions (Group 1) (.1); teleconference with J. Wine and follow-up emails regarding database research in preparation for upcoming depositions (Group 1) (1.3); perform database research in preparation for upcoming depositions (Group 1) (2.5).  Claims Administration & Objections

Date	Indiv	Hours	Description
10/19/2021	JRW	4.40	Conference with J. Rak and follow-up emails regarding database research in preparation for upcoming depositions (Group 1) (1.3); confer with A. Watychowicz regarding review of claimants' discovery responses (Group 1) (.4); correspondence to team regarding notice to Group 1 claimant, motion to compel, and upcoming depositions (Group 1) (.3); search for records in database and related exchange with vendor support (Group 1) (.3); correspondence to claimants' counsel regarding deposition notices and Group 1 distribution list (Group 1) (.1); correspondence to claimant regarding notices, standard discovery, and noticed deposition (Group 1) (.2); continued review of investordiscovery responses (Group 1) (1.8).  Claims Administration & Objections
	MR	0.40	Attention to various issues on deposition and motion to compel (Group 1) (.3); attention to various claims issues (sole lien) (.1).  Claims Administration & Objections
10/20/2021	AW	0.40	Communicate with J. Wine regarding her call with claimant, attention to counsel communication, and email claimant past correspondence from the Receiver (Group 1) (.3); confirm addition of counsel to distribution list (Group 1) (.1).  Claims Administration & Objections
	JR	5.30	Teleconference with J. Wine regarding review of database research in preparation for upcoming depositions (Group 1) (.9); further communication with J. Wine relating to the EB documents database research related to upcoming depositions (Group 1) (.5); perform database research in preparation for upcoming depositions (Group 1) (3.9).  Claims Administration & Objections
	JRW	3.50	Confer with J. Rak and vendor support regarding database research (Group 1) (.2); review deposition subpoena to SEC and related correspondence to A. Porter (Group 1) (.1); exchange correspondence with SEC (Group 1) (.1); telephone conference with claimant regarding discovery obligations and deposition notice (5450 Indiana; 7749 Yates; 7750 Muskegon; 7656 Kingston; 1102 Bingham) (.2); correspondence with A. Watychowicz and claimant regarding service of pleadings, orders and discovery requests and responses (Group 1) (.4); telephone conference with claimants' counsel regarding upcoming depositions (Group 1) (.1); review tagged documents regarding upcoming depositions and related communications with J. Rak (Group 1) (2.4).  Claims Administration & Objections
10/21/2021	AW	0.40	Prepare claims files to share with claimant and related email (5450 Indiana; 7749 Yates; 7750 Muskegon; 7656 Kingston; 1102 Bingham) (.3); attention to emails regarding preparation of deposition exhibits and change of time of depositions (Group 1) (.1).  Claims Administration & Objections

Date	Indiv	Hours	Description
10/21/2021	JR	3.40	Communication with EB documents database customer service (Group 1) (.3); teleconference with J. Wine regarding review of database research in preparation for upcoming depositions (Group 1) (.1); perform database research in preparation for upcoming claimant depositions (Group 1) (3.0).  Claims Administration & Objections
	JRW	3.10	Exchange correspondence with A. Watychowicz and A. Porter regarding claimant communication, deposition preparation, and correspondence from court reporter (Group 1) (.2); telephone conference with counsel for SEC (Group 1) (.1); exchange correspondence with K. Duff, K. Pritchard regarding EB database vendor invoices and related review of disbursement records and agreement (all) (.4); exchange correspondence with database vendor (all) (.1); identify exhibits for upcoming depositions and confer with A. Watychowicz regarding preparation of same (Group 1) (1.6); continue drafting deposition outline (Group 1) (.7).  Claims Administration & Objections
	KMP	0.20	Communications with K. Duff and J. Wine regarding vendor invoices for claims document database (all).  Claims Administration & Objections
10/22/2021	AEP	1.10	Teleconference with J. Wine to review relevant potential exhibits and preparation for deposition (Group 1).  Claims Administration & Objections
	AW	1.10	Review online link containing discovery responses and supplement with additional discovery (Group 1) (.3); email claimant regarding discovery responses, access, and confidentiality issue (Group 1) (.1); review submitted claim and prior correspondence with Receiver, consult with K. Duff and J. Wine regarding claim amendment, and related email to claimant (all) (.3); attention to changed deposition times and update docket (Group 1) (.2); review claims, draft response emails, and email J. Wine and K. Duff regarding rollover issues (all) (.2).  Claims Administration & Objections
	JR	3.40	Perform database research in preparation for upcoming claimant depositions (7750 Muskegon; 7625 East End; 3074 Cheltenham; 7201 Constance).  Claims Administration & Objections

Date	Indiv	Hours	Description
10/22/2021	JRW	5.40	Correspondence with claimant regarding judge's orders, communications from Receiver, and materials accessible to Group 1 claimants (Group 1) (.2); continued preparation and identification of exhibits for upcoming depositions (Group 1) (2.9); telephone conference and email correspondence with claimant's counsel and SEC regarding procedures and scheduling for upcoming depositions (Group 1) (.5); meet with A. Porter to prepare for deposition and related update of files (Group 1) (1.6); exchange correspondence with claimants' counsel regarding notice to claimants of rescheduled deposition (Group 1) (.1); attention to claimant inquiry (all) (.1).  Claims Administration & Objections
10/23/2021	AEP	4.50	Review and analyze e-mails of main EquityBuild principals and other documents assembled by J. Wine, review and analyze documents pertaining to refinancing of properties quitclaimed to entity, prepare deposition outline and exhibits in connection with deposition (Group 1).  Claims Administration & Objections
10/25/2021	AEP	2.10	Attend and participate in Zoom deposition (Group1).  Claims Administration & Objections
	AW	0.60	Communicate with claims vendor regarding corrupted file and request download (all) (.1); attention to claim file, update claims files, and update claims spreadsheet (all) (.2); attention to exhibits received from counsel and related email to J. Wine (.1); update docket entries for rescheduled depositions (Group 1) (.1); email response to claimant (all) (.1).  Claims Administration & Objections
	JR	2.80	Perform database research in preparation for upcoming claimant depositions related to institutional lender's inquiries of various claims (Group 1) (2.5); exchange communication with client services requesting resolutions to several issues regarding EB documents database (Group 1) (.2); communication with J. Wine regarding files related to recent claimant search (Group 1) (.1).  Claims Administration & Objections
	JRW	4.30	Correspond with court reporter regarding deposition exhibits (Group 1) (.1); confer with A. Porter regarding deposition and exhibits (Group 1) (.2); work on deposition exhibits (Group 1) (.2); review discovery productions, proofs of claim and database search results in preparation for depositions (Group 1) (3.8).  Claims Administration & Objections
	KMP	0.20	Review prior email correspondence and communications with K. Duff regarding potential claim (7749 Yates).  Claims Administration & Objections

Date	Indiv	Hours	Description
10/26/2021	AW	0.60	Attention to emails regarding cancellation, addition, and change of date and time of depositions and update docket (Group 1) (.2); regroup discovery folder and related email to J. Wine (Group 1) (.1); email K. Duff regarding claimants' relationship to EquityBuild (all) (.1); email J. Wine requested claims documents (Group 1) (.1); email exchange regarding notification to claimants about scheduled hearing (Group 1) (.1).  Claims Administration & Objections
	JR	2.30	Conduct database research in preparation for upcoming claimant depositions related to institutional lender's inquiries of various claims (Group 1).  Claims Administration & Objections
	JRW	6.20	Attend claimant deposition (Group 1) (1.7); exchange correspondence with claimants' counsel and court reporter regarding exhibits (Group 1) (.2); additional deposition preparation (Group 1) (1.6); telephone conference and correspondence with K. Duff and M. Rachlis regarding depositions (Group 1) (.4); confer regarding depositions (defer) (.2); telephone conference with K. Duff and M. Rachlis in preparation for hearing on motion to compel (Group 1) (.2); attend claimant deposition (Group 1) (.8); telephone conference and email correspondence regarding deposition testimony (Group 1) (.4); attend claimant deposition (Group 1) (.5); review court order regarding hearing and related correspondence regarding notice to claimants (Group 1) (.2).  Claims Administration & Objections
	MR	1.00	Review materials regarding motion to compel (Group 1) (.2); attention to correspondence and telephone conference with J. Wine and K. Duff regarding investor claimant depositions and hearing before Judge Kim (Group 1) (.6); telephone conference with SEC (Group 1) (.2).  Claims Administration & Objections
10/27/2021	AW	0.80	Email claimant's counsel regarding update to claimants' discovery folder and access to same (Group 1) (.1); email with J. Wine regarding draft email and email claimants regarding motion to compel and related orders (Group 1) (.1); attention to email exchanges between claimants and related emails to individual claimants (Group 1) (.2); forward correspondence from claimants to K. Duff and J. Wine (Group 1) (.1); review files and communicate with J. Wine regarding discovery responses (Group 1) (.1); review discovery responses and related email to J. Wine (Group 1) (.2).  Claims Administration & Objections

Date	Indiv	Hours	Description
10/27/2021	JR	1.50	Conduct database research in anticipation of claimant depositions (Group 1) (.8); exchange communication with J. Wine related to completion of project regarding database and communication between claimants and EquityBuild employees (Group 1) (.5); exchange communication with database customer support regarding searches in the database (Group 1) (.2).
			Claims Administration & Objections
	JRW	8.50	Confer with A. Watychowicz regarding claimant and counsel emails and organization of discovery folders (Group 1) (.4); review claimant correspondence (Group 1) (.1); correspondence with claimants' counsel regarding upcoming depositions (Group 1) (.1); correspondence with SEC and upload documents (Group 1) (.2); confer with J. Rak regarding database searches (all) (.2); appearance in court before Judge Kim on claimants' motion to compel (Group 1) (.6); continued review of discovery materials, proofs of claim and database search results in preparation for upcoming depositions (Group 1) (4.9); attend claimant deposition (Group 1) (1.7); telephone conference with SEC (Group 1) (.2); exchange correspondence with court reporter regarding deposition exhibits (Group 1) (.1).
			Claims Administration & Objections
10/28/2021	AW	2.80	Communicate with K. Duff regarding response to claimant's request and related email with claimant (defer) (.1); email claimants regarding past and upcoming depositions (Group 1) (.1); respond to claimant's request for claims process information (8326 Ellis, 8834 Ellis; 8342 Ellis; 8352 Ellis) (.1); research regarding claims process, summary proceedings, and related oppositions and related emails and call with K. Duff (sole lien) (1.7); forward correspondence from claimants to K. Duff and J. Wine (Group 1) (.1); review and thorough calculation of claimant's return and related email to J. Wine (Group 1) (.5); update master claims list and claims documents (all) (.2).
			Claims Administration & Objections
	JRW	8.50	Review documents and prepare for upcoming depositions (Group 1) (4.6); attend claimant deposition (Group 1) (1.2); exchange correspondence with counsel for claimants regarding single claim process (sole lien) (.1); correspondence with accountants regarding holdback for taxes (sole lien) (.2); review and comment on revisions to joint motion (sole lien) (.9); telephone conference with K. Duff regarding depositions (Group 1) (.2); review deposition exhibits and related exchanges of correspondence with claimants' counsel (Group 1) (.3); additional revisions to joint motion to incorporate comments from K. Duff, M. Rachlis and tax advisor (sole lien) (.7); revise Exhibit B to joint motion (sole lien) (.3).
			Claims Administration & Objections
	KMP	0.20	Review orders for docket citations for draft motion relating to single lien claims and related communications with K. Duff (sole lien).
			Claims Administration & Objections

Date	Indiv	Hours	Description
10/28/2021	MR	0.50	Attention to various issues on draft motion on single claims process and follow up with J. Wine and K. Duff (sole lien).  Claims Administration & Objections
10/29/2021	AW	1.00	Attention to voice messages from claimants and related email responses (Group 1) (.2); attention to documents provided by claimant scheduled for deposition and related email to J. Wine (Group 1) (.1); follow up with K. Duff regarding email from claimant (all) (.1); communicate with J. Wine regarding email traffic and next steps (Group 1) (.2); attention to email regarding claimants' relation, supplement notes, and related email to J. Wine (Group 1) (.1); review discovery responses and related email to J. Wine (Group 1) (.3).  Claims Administration & Objections
	JRW	7.50	Confer with claimants' counsel and document vendor regarding deposition exhibits and related review of same (Group 1) (.3); finalize draft of joint motion and exhibit regarding single claim process and related correspondence to claimants' counsel (sole lien) (.3); continued preparation for depositions (Group 1) (.6); attend deposition of M. Turzewski (Group 1) (3.8); telephone conference and exchange correspondence with claimants' counsel regarding deposition and exhibits (Group 1) (.3); review redline of joint motion from claimants counsel, telephone conference with claimants' counsel, additional revisions to joint motion, and related correspondence and investigation regarding City of Chicago liens (sole lien) (.8); attend deposition (Group 1) (.3); correspondence to claimant regarding court order and receiver's website (all) (.1); review additional document production from claimant (Group 1) (.2); correspondence with SEC (Group 1) (.1); telephone conference with A. Watychowicz regarding distribution of discovery materials and email distribution list (Group 1) (.2); update list of key facts (Group 1) (.5).  Claims Administration & Objections
	MR	0.20	Attention to various revisions and issues on motion regarding sole lien process and hearing date for same (sole lien).  Claims Administration & Objections
SUBTOTAL:			[141.00      33813.00]

Date	Indiv	Hours	Description
<u>Status Reports</u>			
10/4/2021	KMP	0.70	Begin work on financial exhibits for third quarter status report. Status Reports
10/5/2021	KMP	3.70	Begin preparation of financial exhibits for third quarter status report. Status Reports
10/6/2021	KMP	2.80	Continue work on financial exhibits for third quarter status report. Status Reports
10/13/2021	JRW	1.90	Correspondence to team regarding items needed for third quarter status report and begin drafting same. Status Reports
10/14/2021	KMP	2.60	Work on preparation of financial exhibits for 3Q2021 status report. Status Reports
10/15/2021	AW	0.40	Review email traffic in receiver's accounts and related email to J. Wine. Status Reports
	JR	1.10	Review 3rd quarter status report requested items from J. Wine and provide same (6217 Dorchester; 7109 Calumet; 638 Avers; 1102 Bingham) (.9); communication with J. Wine regarding 3rd quarter status report and provide requested information (6217 Dorchester; 7109 Calumet Avenue; 638 Avers Avenue; 1102 Bingham) (.2). Status Reports
	JRW	1.80	Exchange correspondence with A. Watychowicz, J. Rak and K. Pritchard regarding third quarter status report (.3); review exhibits and continue drafting status report for third quarter 2021 (1.5). Status Reports
	KMP	3.10	Continue work on preparation of financial exhibits for 3Q2021 status report and forward completed exhibits to J. Wine. Status Reports
10/18/2021	JR	0.90	Review further emails from J. Wine and provide requested information related to 3rd quarter status report (6217 Dorchester; 7109 Calumet; 638 Avers; 1102 Bingham) (.8); further communication with J. Wine regarding 3rd status report (6217 Dorchester; 7109 Calumet; 638 Avers; 1102 Bingham) (.1). Status Reports
	JRW	0.40	Confer with J. Rak regarding exhibit to status report (.1); preparation of exhibit to status report regarding third-quarter sales (.2); exchange correspondence with counsel in state court action regarding case



Date	Indiv	Hours	Description
			update (2450 E 78th) (.1).
			Status Reports
10/21/2021	AW	0.50	Review time entries and detailed email to J. Wine regarding activities that took place in 3rd quarter relating to claims process.
			Status Reports
	JRW	2.60	Exchange communication with accounting professionals regarding status report (.1); exchange communications with M. Bruck and A. Porter regarding status report (.1); continued drafting of third quarter 2021 status report and related communications with A. Watychowicz (2.4).
			Status Reports
10/22/2021	AW	0.30	Follow up email to J. Wine regarding claims process and communications with claimants in third quarter.
			Status Reports
	JRW	1.40	Continue working on third quarter status report and related review of exhibits and correspondence.
			Status Reports
10/25/2021	JRW	1.90	Review redline and further revise third quarter status report to incorporate comments and information from K. Duff, M. Rachlis, M. Bruck and E. Duff.
			Status Reports
	MR	0.40	Review and comment on draft and follow up regarding same.
			Status Reports
10/28/2021	AEP	0.20	Read correspondence regarding state court litigation, reconcile case management deadlines with case calendar, and reply to J. Wine (.1); review draft language of status report regarding state court proceedings and provide comments to K. Duff (.1).
			Status Reports
SUBTOTAL:			[26.70 5088.00]

Tax Issues

10/11/2021	KMP	1.10	Review bank records and prepare spreadsheet providing certain property account details for 2020 in connection with preparation of 2020 tax returns and forward to accountant (1102 Bingham; 2909 E78th; 3030 E 79th).
			Tax Issues

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
10/13/2021	KMP	0.20	Attention to communications from tax administrator regarding finalization of QSF 2020 tax return (all). Tax Issues		
10/14/2021	KMP	0.20	Confer with K. Duff and accountant regarding execution of QSF2020 tax returns (all). Tax Issues		
10/25/2021	KMP	0.30	Attention to receipt of tax notice from government agency relating to EB entity, prepare draft response letter, and forward draftletter to K. Duff for review. Tax Issues		
10/27/2021	AW	0.50	Review past emails and time entries and call with K. Pritchard regarding notices to IRS. Tax Issues		
	KMP	0.80	Review revised response to tax notice from government agency relating to EB entity, and related research (.3); communications with K. Duff and A. Watychowicz relating to tax agency (.2); further revise response and forward to accountant (.3). Tax Issues		
SUBTOTAL:				[ 3.10	434.00]
				221.10	\$50,709.00

Other ChargesDescriptionBusiness Operations

Online research for October 2021	1,047.32
Photocopies for October 2021	10.30
FedEx charges for delivery of materials to Riverway Title in Houston, TX (1102 Bingham)	82.64
Software license fees for October 2021 (Summit Hosting, \$181.41; Google Suite, \$96)	277.41

SUBTOTAL:

[ 1,417.67]

Total Other Charges

\$1,417.67

Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Jodi Wine	94.00	260.00	\$24,440.00
Ania Watychowicz	27.70	140.00	\$3,878.00
Justyna Rak	45.20	140.00	\$6,328.00
Kathleen M. Pritchard	20.30	140.00	\$2,842.00
Andrew E. Porter	20.30	390.00	\$7,917.00
Ellen Duff	0.20	390.00	\$78.00
Michael Rachlis	13.40	390.00	\$5,226.00

**SUMMARY**

Legal Services	\$50,709.00
Other Charges	\$1,417.67
<b>TOTAL DUE</b>	<b>\$52,126.67</b>

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## Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
SUITE 900  
CHICAGO, ILLINOIS 60605

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

January 25, 2022

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

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

Fed. I.D. No. 61-1421786  
Invoice No. 6622140

Legal Fees for the period November 2021	\$43,593.00
Expenses Disbursed	\$789.04
<b>Due this Invoice</b>	<b>\$44,382.04</b>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Asset Analysis &amp; Recovery</u>			
11/3/2021	JRW	1.00	Attention to drafting subpoenas and related correspondence to A. Porter. Asset Analysis & Recovery
	KMP	0.30	Conferences with J. Wine regarding subpoenas and riders to third parties and forward related documents to J. Wine. Asset Analysis & Recovery
11/17/2021	JRW	0.10	Correspondence from counsel for third party regarding subpoena and confer with K. Duff regarding same. Asset Analysis & Recovery
11/23/2021	AEP	0.50	Review documents produced by third party in response to subpoena and provide comments to J. Wine regarding scope of subpoena to be served upon additional third party. Asset Analysis & Recovery
SUBTOTAL:			[ 1.90 523.00]

Asset Disposition

11/1/2021	JR	6.10	Analysis and reconciliation of settlement statements related to property accounts (7201 Constance; 7201 Dorchester; 7210 Vernon; 7237 Bennett; 7255 Euclid; 7300 Lawrence; 7301 Stewart; 7442 Calumet; 7450 Luella; 7500 Eggleston; 7508 Essex; 7546 Saginaw; 7549 Essex; 7600 Kingston; 7625 East End; 7635 East End; 7656 Kingston; 7701 Essex; 7712 Euclid; 7748 Essex; 7749 Yates; 7750 Muskegon; 7760 Coles; 7834 Ellis; 7836 South Shore; 7840 Yates; 7922 Luella; 7925 Kingston; 7927 Essex; 7933 Kingston; 7933 Essex; 7937 Essex; 7943 Essex; 7947 Essex; 7953 Woodlawn; 7957 Marquette; 8000 Justine; 8030 Marquette; 8047 Manistee; 8100 Essex; 8104 Kingston; 8107 Kingston; 8107 Ellis; 816 Marquette; 8201 Kingston; 8209 Ellis; 8214 Ingleside; 8326-58 Ellis; 8346 Constance; 8403 Aberdeen; 8405 Marquette; 8432 Essex; 8517 Vernon; 8529 Rhodes; 8800 Ada; 909 E 50th; 9212 Parnell; 9610 Woodlawn) (5.7); exchange communication with A. Porter inquiring about lien waiver expense for property and resolution of same (2909 S 78th) (.2); communication with J. Wine providing requested judgment lien payoff information for various properties (8517 Vernon; 9610 Woodlawn) (.2) Asset Disposition
11/2/2021	AEP	0.20	Read e-mail from J. Rak regarding closing statement associated with conveyance of receivership property, research files and e-mail communications for additional information, and reply accordingly (638 Avers). Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/2/2021	JR	3.00	<p>Review of property manager lien waivers from sale of property, correspond payment associated with lien waivers to the debits across all settlement statements from sale of properties (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham) (2.8); exchange correspondence with A. Porter identifying discrepancies related to lien waivers and settlement statements related to payment for property manager (2909 E 78th) (.2).</p> <p>Asset Disposition</p>
11/3/2021	JR	1.50	<p>Further analysis and search of lien waiver related to discrepancies for various properties (5955 Sacramento; 6001 Sacramento; 701 S 5th; 7110 Cornell) (1.4); exchange communication with K. Pritchard regarding property post-sale reconciliation reports related to final account balances for property (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham) (.1).</p> <p>Asset Disposition</p>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/3/2021	KMP	0.30	Communicate with J. Rak regarding issues relating to reporting for post-sale funds reconciliation for property and briefly research related email correspondence (2909 E 78th).  Asset Disposition
11/4/2021	MR	0.20	Attention to dismissal ruling on appeal and related conferences (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition
11/16/2021	AEP	0.30	Teleconference with K. Duff regarding latest developments associated with potential sale of receivership property and strategies for marketing and selling same (7109 S Calumet).  Asset Disposition
	JR	4.00	Review, organize and update all files related to property closings (7110 Cornell; 7760 Coles; 1102 Bingham; 8214 Ingleside; 6437 Kenwood; 1131 E 79th; 8326-58 Ellis; 7840 Yates; 4750 Indiana; 7051 Bennett; 1422 East 68th; 7255 Euclid; 6217 Dorchester; single family; 11117 Longwood; 3074 Cheltenham 8201 Kingston; 4750 Indiana; 7600 Kingston; 7656 Kingston) (3.4); review email from A. Porter related to a title insurance holdback from closing, further investigate and exchange communication with City of Chicago requesting an update on original releases related to city judgements for property (7748 Essex) (.4); further communication with the title company requesting to provide document and lien information related to release of lien (7748 Essex) (.1); follow up communication with property management requesting direction on owner portal related to post-closing reconciliation and final account statement for property (2736 W 64th) (.1).  Asset Disposition
	JRW	0.10	Telephone conference with claimants' counsel regarding credit bid and related correspondence with K. Duff and A. Porter (7109 Calumet).  Asset Disposition
11/17/2021	JR	1.70	Confirm and review settlement statements from all property closings pertaining to funds withheld from closings for payment of various entities (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laffin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham) (1.5); exchange communication with the title company requesting to provide document and lien information related to release of lien (7748 Essex) (.2).
			Asset Disposition
11/17/2021	JRW	0.20	Exchange correspondence with claimants' counsel regarding marketing of property (7109 Calumet) (.1); confer with K. Duff and M. Rachlis regarding sale of property (7109 S Calumet) (.1).
			Asset Disposition
11/18/2021	AEP	1.40	Teleconference with J. Rak regarding final reconciliation of all title indemnity holdbacks from closings of all properties (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laffin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham).
			Asset Disposition
	JR	1.40	Conference with A. Porter, K. Duff, broker regarding process related to market and sell property (7109 Calumet) (.3); communicate with J. Wine about publication notice, property and status of violations (7109 Calumet) (.2); communication with management requesting financials for 2020, and early 2021 (7109 Calumet) (.1); update reconciliations for properties (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Lafflin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham) (.8).
			Asset Disposition
11/18/2021	JRW	0.80	Draft and place publication notice and related correspondence with broker (7109 Calumet).
			Asset Disposition
	KMP	3.60	Review bank records and other materials to verify and record proceeds for property sales and refunds for holdbacks (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Lafflin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham).
			Asset Disposition
11/19/2021	KMP	4.50	Further review of bank records and other materials to verify and record proceeds for property sales and refunds for holdbacks, and related communication with J. Rak (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301

Date	Indiv	Hours	Description
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Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham) (4.3); attention to communication with property manager regarding request for post-sale funding for security door installation, and related review of prior communications (638 Avers) (.2)

#### Asset Disposition

11/22/2021 JR

2.70 Review email from K. Pritchard requesting updates to post-closing reconciliation (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham) (.2); review email from K. Duff requesting buyer purchased properties (7500 Eggleston; 7549 Essex) (.1); review email from management regarding a water bill for sold property, review same (9610 Woodlawn) (.3); review property statements, correspondence with K. Pritchard, K. Duff and property management regarding reconciliation of final account balance for property (638 Avers) (2.1).

#### Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
11/22/2021	KMP	1.60	Attention to further communications with property manager regarding post-sale request for funding for security door installation, related review of materials on owner portal relating to post-sale fund reconciliation, related telephone conference with J. Rak, and related communications with K. Duff and A. Porter (638 Avers).  Asset Disposition
11/23/2021	AEP	0.30	Read e-mail from J. Rak regarding settlement statements associated with conveyances of receiver properties and wire transfer receipts corresponding thereto, analyze all relevant documentation, and prepare response regarding suggested appropriate follow-up action (7549 S Essex; 7500 S Eggleston).  Asset Disposition
	JR	2.80	Analyze, update post-closing reconciliation of properties (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham) (1.9); correspondence with K. Pritchard requesting additional clarification related to post-closing reconciliation for properties (4750 Indiana; 4533 Calumet; 5618 MLK) (.2); communication with the title company requesting property information related to post-closing reconciliation (4533 Calumet; 5618 MLK) (.2); analyze post-sale discrepancies, correspond with A. Porter requesting information for same (7500 Eggleston; 7549 Essex) (.5).  Asset Disposition
	JRW	0.20	Correspondence from intervenor's counsel and related email exchange with team regarding motion to convert interlocutory order to final order (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition
	KMP	0.50	Review additional materials regarding issues relating to closings for certain properties and related communications with J. Rak (4750 Indiana; 4533 Calumet; 5618 MLK).  Asset Disposition

Date	Indiv	Hours	Description
11/23/2021	MR	0.30	Attention to request for language for final order and related exchanges (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition
11/24/2021	JRW	0.30	Review motion by intervenor to Designate Interlocutory Order as Final Judgment and related communications with team (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition
	MR	0.20	Attention to motion for Rule 54b language (6949 Merrill; 7600 Kingston; 7658 Kingston).  Asset Disposition
11/29/2021	KMP	0.50	Communications with J. Rak regarding proceeds from sale of properties (7500 Eggleston; 7549 Essex) and provide documentation (.2); conferences with bank representative and J. Rak regarding statements for each property account for final review of distribution of sale proceeds (all) (.3).  Asset Disposition
11/30/2021	AEP	0.80	Read, edit, and revise draft purchase and sale contract for conveyance of receivership property (7109 S Calumet) (.5); teleconference with J. Rak regarding accounting for sales proceeds following releases of title indemnity holdbacks (6160 MLK; 8100 Essex) (.3).  Asset Disposition
	KMP	0.50	Further review of financial documents and follow up communications with J. Rak regarding distribution of proceeds from sale of properties (6160 MLK; 8100 Essex) (.3); further conferences with bank representative and J. Rak regarding statements for each property account for final review of distribution of sale proceeds (all) (.2).  Asset Disposition
SUBTOTAL:			[40.00                      6717.00]

Business Operations

11/1/2021	JRW	0.30	Exchange correspondence with corporation counsel regarding housing court order dismissing defendant and update records regarding same (638 Avers) (.1); review and revise draft motion to intervene (defer) (.1); correspondence from K. Duff regarding motion to intervene (defer) (.1).  Business Operations
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Date	Indiv	Hours	Description
11/1/2021	MR	0.20	Attention to proposed order and emails on same associated with state court litigation foreclosure matters (defer). Business Operations
11/2/2021	AW	1.20	Investigation of EB records (defer). Business Operations
	KMP	0.40	Review notice, prepare draft notice letter, and related communication with K. Duff (4611 Drexel). Business Operations
11/3/2021	JR	0.20	Review email from accounting firm requesting endorsement, request same from property insurance company and further exchange communication with E. Duff (4611 Drexel). Business Operations
	JRW	0.40	Review order regarding default and rescheduled hearing for previously unknown administrative matter and related investigation and correspondence with K. Duff, J. Rak, and corporation counsel (7834 Ellis). Business Operations
	KMP	0.20	Communicate with property manager regarding collection notice for property utility and related communications with K. Duff (4611 Drexel). Business Operations
11/5/2021	JR	0.20	Exchange communication with account analyst requesting property endorsement (4611 Drexel). Business Operations
	KMP	1.20	Research regarding provisions for insurance reporting on premium refunds for sold properties, begin preparing spreadsheet to track premium refunds for sold properties, and related communications with K. Duff (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201

Date    Indiv   Hours   Description

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Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham) (.9); research tracking for delivery of deposit to bank and related conferences with K. Duff and bank representative (7110 Cornell) (.3).

Business Operations

11/5/2021   MR    0.20 Exchanges and attention to issues on state court litigation (2450 E78th).

Business Operations

11/8/2021   AEP   0.40 Attempted communications with counsel for proposed intervenors and proofread, edit, and revise successive drafts of proposed motion for enlargement of time to respond (defer).

Business Operations

AW    0.80 Draft motion for extension to respond to motion to intervene (defer) (.3); attention to email exchanges regarding revisions and apply requested revisions (defer) (.2); call with J. Wine regarding further revisions (defer) (.1); finalize and file motion for extension (defer) (.2).

Business Operations

JR    0.60 Exchange communication with property management requesting production of all post-closing reconciliation final account balance statements to reconcile post-closing expenses for all closed properties and related communication with E. Duff (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laffin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham) (.5); correspondence with account analyst requesting endorsement for property (4611Drexel) (.1).

Business Operations

Date	Indiv	Hours	Description
11/8/2021	JRW	0.50	Review and revise motion for extension of time to respond to motion to intervene and related correspondence with K. Duff and A. Porter (defer). Business Operations
	KMP	0.20	Follow up with bank representative and K. Duff regarding deposit (7110 Cornell). Business Operations
	MR	0.30	Attention to various issues on reply to intervenor motion (defer). Business Operations
11/9/2021	KMP	0.20	Follow up with K. Duff and J. Wine regarding deposit, and related efforts to reach insurer (7110 Cornell). Business Operations
11/10/2021	JR	0.30	Review email from K. Pritchard requesting information related to property insurance premium refunds, further communicate with E. Duff regarding same (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laffin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham). Business Operations
	KMP	0.40	Conference with insurance company representative regarding claim check, and related follow up with K. Duff and J. Wine (7110 S Cornell) (.2); communications with K. Duff and J. Rak regarding efforts to obtain information from insurance broker relating to refunds for coverage related to sold properties (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W



Date	Indiv	Hours	Description
			102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham) (.2).
			Business Operations
11/11/2021	JRW	0.20	Exchange correspondence with K. Duff, K. Pritchard and property manager regarding gas bill (4611 Drexel).
			Business Operations
	KMP	0.60	Communications with insurance broker to obtain information relating to refunds for coverage related to sold properties (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham) (.2); communications with property manager regarding details relating to utility collection notice from creditor, revise draft notice letter to creditor, and related communications with K. Duff (4611 Drexel) (.4).
			Business Operations

Date	Indiv	Hours	Description
11/15/2021	AEP	0.30	Read correspondence from counsel for prospective intervenor and revise proposed stipulation and order regarding limited lift of automatic stay (defer).  Business Operations
	JRW	0.40	Review administrative court orders, update records, and related correspondence to corporation counsel (4750 Indiana, 7834 Ellis)(.3); telephone conference with corporation counsel regarding administrative court orders (4750 Indiana, 7834 Ellis) (.1).  Business Operations
11/16/2021	AW	0.20	Attention to civil lawsuit, review complaint, and related communication with J. Wine (4533 Calumet).  Business Operations
	JRW	1.00	Review state court complaint and property manager records and related correspondence with K. Duff and K. Pritchard (4533 Calumet).  Business Operations
	KMP	0.80	Review complaint relating to EB property, prepare draft letter providing notice of appointment of receiver, and related communications with J. Wine (4533 Calumet) (.6); communication with insurance broker to confirm property manager as additional named insured on property policies (7109 Calumet) (.2).  Business Operations
11/17/2021	KMP	0.20	Attention to notice from bank regarding check for insurance claim and related communications with K. Duff and J. Wine (3074 Cheltenham).  Business Operations
11/18/2021	AW	0.40	Research regarding entered stipulations (4533 Calumet).  Business Operations
	JRW	1.10	Exchange correspondence with K. Duff regarding new state court matter and related review of stipulated orders regarding prior cases (4533 Calumet) (.5); draft notice letter to plaintiff's counsel (4533 S Calumet) (.4); correspondence to insurance broker regarding state court complaint (4533 Calumet) (.1); exchange correspondence with plaintiff's counsel (4533 Calumet) (.1).  Business Operations
	KMP	0.30	Revise and finalize response and notice letter relating to personal injury complaint, prepare transmittal, and related communication with J. Wine (4533 Calumet).  Business Operations

Date	Indiv	Hours	Description
11/18/2021	MR	0.20	Attention to state court suit and related issues (4533 Calumet). Business Operations
11/19/2021	JR	1.80	Review and update property reconciliation report and forward same to A. Porter (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham). Business Operations
	JRW	0.60	Study prior stipulations and orders regarding relief from stay in connection with new state court lawsuit (4533 Calumet) (.4); telephone conference with plaintiff's counsel regarding state court matter (4533 Calumet) (.2). Business Operations
11/21/2021	AEP	0.20	Read e-mail from counsel for putative intervenors regarding resistance to execution of proposed stipulation, communications with K. Duff regarding same, and prepare response to counsel for putative intervenors (defer). Business Operations
	MR	1.30	Attention to various emails and work on draft response to intervenor motion regarding foreclosure properties (defer). Business Operations
11/22/2021	AEP	0.40	Read, edit, and revise latest draft of memorandum in opposition to motion to intervene (defer). Business Operations

Date	Indiv	Hours	Description
11/22/2021	AW	0.50	Proofread opposition to motion to intervene, email exchanges regarding proposed revisions, finalize and file motion (defer). Business Operations
	MR	0.60	Further review and comments on opposition brief on intervenor issue (defer). Business Operations
11/23/2021	JRW	0.50	Confer with K. Pritchard regarding settlement payment and related correspondence to plaintiff's counsel (7110 Cornell) (.2); telephone conference with insurance agent and follow-up email to K. Duff and M. Rachlis (4533 Calumet) (.3). Business Operations
	MR	0.50	Attention to issues on stipulation for issues on foreclosure action and conference regarding same (defer) (.4); attention to issues and status on state court matter (4533 Calumet) (.1). Business Operations
11/24/2021	AEP	0.30	Read and revise latest draft of proposed stipulation and order resolving motion to intervene (defer). Business Operations
	JR	1.10	Follow up correspondence with account analyst requesting update on property endorsement (4611 Drexel)(.1); exchange correspondence with K. Pritchard regarding a reconciliation discrepancy related to net proceeds for various properties, review bank statements, request for additional bank statements regarding same (7500Eggleston; 7549 Essex) (.8); review email from A. Porter regarding post-closing title company holdbacks related to properties and respond accordingly (5618 MLK; 4533 Calumet; 7748 Essex) (.2). Business Operations
	JRW	0.40	Exchange correspondence with property manager regarding personal injury complaint and document retention (4533 Calumet) (.2); telephone conference with insurance adjuster regarding coverage for new claim (4533 Calumet) (.2). Business Operations
	MR	0.50	Further attention to stipulation and follow up regarding same (defer). Business Operations
11/29/2021	JR	3.30	Review bank statements related to post-closing reconciliation for property and further communicate with A. Porter and K. Pritchard regarding post-closing refund from the title company (6160 MLK) (.6); further review of settlement statements related to net proceeds regarding post-closing reconciliation

Date	Indiv	Hours	Description
			and communicate with K. Pritchard regarding net proceeds discrepancies (7500 Eggleston; 7549 Essex) (1.4); access bank account statements portal and begin a preliminary review of account statements (all) (.8); further communication with K. Pritchard relating to issues regarding merging of account statements for all property accounts (all) (.2); review email from A. Porter related to title company holdback and sale of property (7748 Essex) (.2); follow up correspondence with account analyst requesting property endorsement (4611 Drexel) (.1).
			Business Operations
11/30/2021	JR	1.20	Review bank statements and holdbacks for various properties, reconcile and exchange further communication with A. Porter and K. Pritchard (7748 Essex; 6160 MLK; 7500 Eggleston).
			Business Operations
	KMP	0.20	Telephone conference with utility company regarding past due invoice and anticipated motion for court approval to pay same from sale proceeds, and related communication with K. Duff (1401 W 109th) (.2).
			Business Operations
SUBTOTAL:			[27.30                      5820.00]

Case Administration

11/1/2021	AW	0.20	Attention to filed motion to determine claims process for single claim properties and related order, share with team, and update docket (sole lien).
			Case Administration
11/2/2021	AW	0.60	Prepare update to web page and related email to IT specialist (defer) (.5); attention to order granting motion regarding expert discovery and share with team (Group 1) (.1).
			Case Administration
11/4/2021	AW	0.40	Prepare pleadings and request upload of pleadings to web page (defer).
			Case Administration
11/16/2021	AW	1.00	Prepare update to web page and related email exchange with IT consultant (defer) (.9); attention to order resetting hearing and email counsel and IT consultant (sole lien) (.1).
			Case Administration
11/19/2021	AW	0.20	Attention to entered orders and update docket (Group 1; sole lien).
			Case Administration

Date	Indiv	Hours	Description
11/22/2021	AW	0.30	Attention to entered orders modifying schedule and regarding expert depositions and update docket (Group 1). Case Administration
11/24/2021	AW	0.20	Attention to motion to designate order as final judgment (6949 Merrill; 7600 Kingston; 7656 Kingston) and update docket (.1); attention to entered order granting extension and update docket (all) (.1). Case Administration
11/30/2021	AW	0.20	Attention to entered briefing schedule and update docket (6949 Merrill; 7600 Kingston; 7656 Kingston) (.1); attention to entered orders and email counsel (sole lien; Group 1) (.1). Case Administration

SUBTOTAL: [ 3.10 434.00]

Claims Administration & Objections

11/1/2021	AEP	0.40	Teleconference with J. Wine regarding deposition and future depositions associated with resolution of Group 1 claims (Group 1). Claims Administration & Objections
	AW	0.40	Compare filed motion and exhibits with approved drafts and related email to J. Wine (sole lien) (.2); research previous correspondence with claimant, check for appearance on file, and related email to K. Duff (6437 Kenwood; 7749 Yates) (.2). Claims Administration & Objections
	JRW	1.60	Exchange correspondence with A. Porter and J. Rak regarding City of Chicago claim (9610 Woodlawn; 8517 Vernon) (.2); attention to claimant inquiries (all) (.3); exchange correspondence with claimants' counsel regarding service of process on investor lender (Group 1) (.1); correspondence with claimants' counsel regarding deposition (Group 1) (.1); confer with A. Porter regarding upcoming deposition (Group 1) (.4); exchange correspondence with K. Duff and A. Watychowicz regarding Group 1 distribution list (Group 1) (.1); exchange correspondence to claimants' counsel regarding City of Chicago claim (9610 Woodlawn; 8517 Vernon) (.1); review motion for leave to retain expert and related correspondence with K. Duff and M. Rachlis (Group 1) (.3). Claims Administration & Objections
	MR	0.50	Attention to motion regarding expert issues and related communications (Group 1) (.4); attention to order and exchanges regarding claim process (sole lien) (.1). Claims Administration & Objections

Date	Indiv	Hours	Description
11/2/2021	AW	1.40	Communicate with K. Duff and J. Wine regarding responses to status report email (all) (.2); email claimant regarding his representation statement (6437 Kenwood; 7749 Yates) (.1); research claim, confirm receipt of supporting document and update email (7749 Yates)(.2); further research regarding signing parties and related email to K. Duff and J. Wine (7749 Yates) (.2); respond to claimant regarding sale proceeds (all) (.1); respond to claimant's voice message (7748 Essex; 7927 Essex) (.1); respond to claimants requesting updates (8100 Essex) (.2); review transcripts for expert discovery references and related email to team (Group1) (.3).  Claims Administration & Objections
	JRW	4.20	Additional correspondence with M. Rachlis regarding motion to retain expert (Group 1) (.2); correspondence with Magistrate Judge Kim, claimants' counsel and SEC regarding potential settlement of claims and related email exchange with K. Duff (Group 1) (.3); final preparation for deposition and related review of second amended privilege log (Group 1) (.6); attend deposition (Group 1) (2.9); correspondence with claimants' counsel regarding privilege log and discovery of title insurance claim (Group 1) (.1); exchange correspondence with (Group 1) (.1).  Claims Administration & Objections
	MR	0.50	Attention to possible response to motion, and related review and follow up with K. Duff and J. Wine (.3); attention to outreach from magistrate and related follow up (Group 1) (.2).  Claims Administration & Objections
11/3/2021	AW	0.20	Email response to claimant's inquiry (6437 Kenwood; 7749Yates) (.1); follow up with J. Wine regarding claimant's email (Group 1) (.1).  Claims Administration & Objections
	JRW	4.40	Prepare for upcoming deposition and related exchanges with counsel and A. Watychowicz regarding deposition exhibits (Group 1) (.8); attend deposition (Group 1) (3.0); telephone conferences with claimants' counsel and K. Duff regarding depositions (Group 1) (.3); attention to vendor invoice (all) (.1); confer with A. Watychowicz regarding deposition transcripts and exhibits (Group 1) (.1); email exchange with claimants' counsel and SEC regarding discovery (Group 1) (.1).  Claims Administration & Objections
11/4/2021	AEP	0.80	Teleconference with team regarding legal and factual issues associated with litigation of priority dispute (Group 1).  Claims Administration & Objections

Date	Indiv	Hours	Description
11/4/2021	AW	0.30	Attention to voice message from claimant and respond by email (all) (.2); correspond with J. Wine regarding claimants' documents and pending response (Group 1) (.1).  Claims Administration & Objections
	JR	0.70	Conference call with M. Rachlis, K. Duff, J. Wine, A. Porter, K. Pritchard and A. Watychowicz related to claim status and discussion of methodologies of navigating through same (all).  Claims Administration & Objections
	JRW	1.90	Conference call with A. Porter, K. Duff, M. Rachlis and A. Watychowicz regarding deposition testimony and potential further discovery (Group 1) (.8); conference call with claimants' counsel and SEC regarding fact and expert discovery (Group 1) (.6); telephone conference with K. Duff regarding claims issues strategy and planning (Group 1) (.2); review deposition transcripts and exhibits (Group 1)(.3).  Claims Administration & Objections
	MR	0.80	Conferences on various discovery issues (Group 1).  Claims Administration & Objections
11/5/2021	AW	0.80	Attention to correspondence between claimants and related email with J. Wine (Group 1) (.1); attention to shared files and confirm receipt (Group 1) (.1); communicate with K. Duff and J. Wine regarding priority issues and related email to claimant (Group 1) (.1); review claims, follow up with J. Wine regarding rollover issue, and related correspondence to claimant (4611 Drexel, SSDF4) (.3); review claim and related email with K. Duff and J. Wine (2909 E 78th; 7549 Essex; 8047 Manistee) (.2).  Claims Administration & Objections
	JRW	0.40	Exchange correspondence with claimants' counsel regarding supplemental document productions from claimants (Group 1) (.2); attention to claimant inquiries (all) (.2).  Claims Administration & Objections
11/7/2021	MR	0.90	Attention to various drafts of motion to modify schedule and related follow up (Group 1).  Claims Administration & Objections
11/8/2021	AW	1.30	Respond to follow up from claimant regarding claims process and timing (8100 Essex) (.1); attention to numerous deposition transcripts and deposition exhibits received from both court reporter and counsel and related email to J. Wine (Group 1) (.6); communicate with K. Duff regarding timing



Date	Indiv	Hours	Description
			and related email to claimant (all) (.1); review claim and related email to K. Duff (1131 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee) (.3); research email to claimants regarding property and related email to K. Duff (8047 Manistee) (.2).
			Claims Administration & Objections
11/8/2021	JRW	0.90	Review correspondence and various revisions of draft Motion to Modify Group 1 Schedule (Group 1) (.6); exchange correspondence with A. Watychowicz regarding deposition exhibits (Group 1) (.1); attention to claimant inquiries (all) (.2).
			Claims Administration & Objections
	MR	1.20	Attention to various issues on revisions on schedule, related communications with K, Duff, J. Wine and others, and related conferences with K. Duff (Group 1).
			Claims Administration & Objections
11/9/2021	JRW	0.30	Correspondence with claimants' counsel, SEC, and M. Rachlis and review meeting summary regarding motion to modify schedule (Group 1).
			Claims Administration & Objections
	MR	0.90	Attention to issues on motion in preparation for call with various counsel and participate in call (Group 1) (.7); follow up with K. Duff and J. Wine related to motion to modify schedule and communications with counsel (Group 1) (.2).
			Claims Administration & Objections
11/10/2021	AW	0.60	Attention to documents from claimant and email exchange with J.Wine regarding saved discovery documents (Group 1) (.2); update claimant's emailing information (Group 1) (.1); further review of claim and email exchanges with J. Wine regarding potential correction (2909 E 78th; 7549 Essex; 8047 Manistee; 1131 E 79th) (.2); attention to deposition transcript and signature page (Group 1) (.1).
			Claims Administration & Objections
	JRW	3.10	Attention to claimant inquiry and related investigation and telephone conference with A. Watychowicz (all) (.4); attention to claims related legal research (Group 1) (2.7).
			Claims Administration & Objections
	MR	0.20	Attention to issues on disclosure (Group 1).
			Claims Administration & Objections
11/11/2021	JRW	4.70	Correspondence and various telephone conferences with claimants' counsel regarding motion to modify Group 1 schedule (Group 1) (.4); prepare summary of conference call and related telephone conference with K. Duff (Group 1) (.4); review redlines and further revise draft motion to modify

Date	Indiv	Hours	Description
			schedule (Group 1) (.5); study prior briefing, transcripts and court's order regarding disclosure of avoidance claims and prepare summary of same (Group 1) (.6); continued claims related legal research and begin drafting disclosure (Group 1) (2.8). Claims Administration & Objections
11/11/2021	MR	0.40	Attention to exchanges regarding scope of disclosures and issues regarding schedules (Group 1). Claims Administration & Objections
11/12/2021	JRW	6.70	Review revised draft motion for extension of Group 1 schedule and related correspondence to claimants' counsel (Group 1) (.1); continued legal research (Group 1) (1.2); continue drafting disclosure and prepare record cites for same (Group 1) (5.4). Claims Administration & Objections
	MR	0.10	Attention to motion to modify schedule (Group 1). Claims Administration & Objections
11/13/2021	MR	2.50	Work on and review draft disclosure on claims and related comments (Group 1). Claims Administration & Objections
11/15/2021	AEP	1.70	Read draft memorandum in connection with Group 1 adjudication (Group 1) (.4); teleconference with K. Duff, M. Rachlis, and J. Wine regarding legal issues and relevant facts associated with preparation of disclosure (Group 1) (1.3). Claims Administration & Objections
	AW	0.90	Call with J. Wine regarding motion for extension of discovery deadlines (Group 1) (.1); attention to email from IRA custodian, related exchange with K. Duff, and respond to non-claimant (defer) (.2); email exchange with K. Duff regarding proposed response to voice message and related email with claimant (Group 1) (.2); attention to email from claimant regarding appearance of his name, related research, and email exchanges with K. Duff and J. Wine (638 Avers; 7024 Paxton; 7255 Euclid; 6250 Mozart; 6217 Dorchester) (.2); attention to email from claimant regarding potential representation and related email exchange with K. Duff and response to claimant (8100 Essex) (.2). Claims Administration & Objections
	JRW	3.80	Review redlines, review deposition transcripts, and further revise disclosure (Group 1) (1.6); attention to claimant inquiries (all) (.2); telephone conference with K. Duff, A. Porter, M. Rachlis regarding analysis of potential disclosure (Group 1) (1.2); factual research regarding claim and related correspondence to K. Duff (Group 1) (.8). Claims Administration & Objections

Date	Indiv	Hours	Description
11/15/2021	KMP	1.50	Review case files and compile documents relating to claimant, and forward to K. Duff (Group 1). Claims Administration & Objections
	MR	1.80	Confer with K. Duff, A. Porter, and J. Wine regarding analysis of potential issues for disclosures (Group 1) (1.3); further review of materials regarding disclosures and upcoming hearing and order on motion to compel (Group 1) (.5). Claims Administration & Objections
11/16/2021	AW	0.50	Attention to email from claimant regarding sales and litigation, communicate with K. Duff regarding proposed response, and related email to claimant (2909 E 78th; 7549 Essex; 8047 Manistee; 7749 Yates) (.2); review claim with rollover issue, compile key documents from database, and related email to K. Duff and J. Wine (638 Avers; 7024 Paxton; 7255 Euclid; 6250 Mozart; 6217 Dorchester) (.3). Claims Administration & Objections
	JRW	3.60	Review redline and further revise disclosure (Group 1) (.2); review deposition transcripts and extract key testimony (Group 1) (1.3); telephone conference with K. Duff and SEC (Group 1) (.4); prepare for hearing on motion regarding single claims process (sole lien) (.6); telephone conference with K. Duff and M. Rachlis regarding upcoming hearing (sole lien) (.2); telephone conference with K. Duff and M. Rachlis regarding draft disclosure (Group 1) (.2); attention to claimant inquiries and related exchange of correspondence regarding distributions (all) (.6); review court order and related correspondence with claimants' counsel (all) (.1). Claims Administration & Objections
	KMP	1.30	Review documents relating to claimant, and prepare related email memorandum to K. Duff (Group 1). Claims Administration & Objections
	MR	1.60	Attention to issues for upcoming hearing (sole lien) (.5); conferences with K, Duff and J. Wine regarding various issues for the upcoming hearing (sole lien) (.5); attention to issues regarding disclosure and review materials associated with same for possible reference (Group 1) (.6). Claims Administration & Objections
11/17/2021	AEP	2.50	Read, edit, research and analyze discovery documents, and revise current draft of proposed disclosure statement (Group 1). Claims Administration & Objections

Date	Indiv	Hours	Description
11/17/2021	AW	1.30	<p>Attention to emails from claimants and update contact info as requested (defer) (.2); update contact spreadsheet with email addresses for claimants that have no claims against properties (defer) (.2); follow up email to claimant to confirm claims (2909 E 78th; 7549 Essex; 8047 Manistee; 1131 E 79th) (.1); email and follow up email with claimant regarding claims process and distribution (638 Avers; 7024 Paxton; 7255 Euclid; 6250 Mozart; 6217 Dorchester) (.2); call with J. Wine regarding review of claims (all) (.1); call with J. Rak regarding review of claims for all Receivership properties (all) (.3); attention to email and several voice messages from claimant, communicate with K. Duff and J. Wine regarding response, and related email to claimant (all) (.2).</p> <p>Claims Administration &amp; Objections</p>
	JRW	5.40	<p>Attention to claimant inquiries (all) (.2); correspondence to A. Porter regarding deposition cites (Group 1) (.1); review email correspondence concerning claimant (Group 1) (.9); continue working on draft disclosure statement and document citations for same (Group 1) (2.3); prepare for motions hearing on single lien properties (sole lien) (.6); telephone conference with M. Rachlis and K. Duff to prepare for upcoming hearing (sole lien) (1.2); confer with M. Rachlis and K. Duff regarding expert discovery (Group 1) (.1).</p> <p>Claims Administration &amp; Objections</p>
	KMP	0.50	<p>Revise and finalize response and notice letter relating to collection notice for utility invoice and prepare transmittals (4611 Drexel) (.3); prepare check and transmittal for payment of vendor invoice for claims database services (all) (.2).</p> <p>Claims Administration &amp; Objections</p>
	MR	2.50	<p>Further attention to upcoming disclosure submission, hearing and expert related issues (Group 1) (1.3) conferences with K. Duff and J. Wine regarding issues for upcoming hearing (sole lien) (1.2).</p> <p>Claims Administration &amp; Objections</p>
11/18/2021	AW	0.70	<p>Draft response to claimant and related email to K. Duff (2909 E 78th; 7549 Essex; 8047 Manistee) (.1); research and email exchange with M. Rachlis regarding orders, transcripts' content, and claims process (sole lien) (.6).</p> <p>Claims Administration &amp; Objections</p>
	JRW	4.90	<p>Continued drafting and revision of disclosure and related identification of exhibits and communications with A. Porter and K. Duff (Group 1) (2.7); prepare for and attend motions hearing before Judge Lee (sole lien) (.8); attend motions hearing before Judge Lee (Group 1) (.4); telephone conference with K. Duff and M. Rachlis regarding hearing (Group 1) (.5); confer with K. Duff and A. Watychowicz regarding Position Statement template (Group 1) (.1); review and comment on proposed order and related correspondence with claimants' counsel and SEC (Group 1) (.4).</p> <p>Claims Administration &amp; Objections</p>

Date	Indiv	Hours	Description
11/18/2021	KMP	0.90	Review various orders and transcripts relating to court's rulings regarding claims in connection with upcoming hearing and related communications with M. Rachlis and A. Watychowicz (all).  Claims Administration & Objections
	MR	4.90	Review and prepare for upcoming hearing on various issues (sole lien) (3.3); participate in hearing (sole lien) (1.0); conferences with K. Duff and J. Wine regarding areas for follow up from hearing (Group 1) (.6).  Claims Administration & Objections
11/19/2021	AW	0.10	Correspond with J. Wine regarding hearing and revised schedule (Group 1).  Claims Administration & Objections
	JRW	0.90	Correspondence and telephone conferences with claimants' counsel and SEC, related analysis of draft order to K. Duff and M. Rachlis (Group 1) (.4); telephone conferences and correspondence with claimants' counsel regarding modification of schedule (Group 1) (.3); revise proposed order and correspondence to JudgeLee's clerk regarding same (Group 1) (.2).  Claims Administration & Objections
	MR	0.20	Further review of proposed order and related follow up (Group 1).  Claims Administration & Objections
11/22/2021	AW	1.40	Work on master claims list and email list (Group 1) (1.2); email exchanges with J. Wine regarding proposed email to claimants (Group 1) (.2).  Claims Administration & Objections
	JRW	2.90	Exchange correspondence with A. Watychowicz regarding court order and process for single claim properties (sole lien) (.2); attention to third-party discovery and related correspondence to claimants' counsel (sole lien) (.3); confer with A. Watychowicz regarding email to claimants regarding modification of schedule (Group 1) (.1); correspond with claimants' counsel regarding magistrate judge's order and expert deposition scheduling (Group 1) (.2); review and revise response to motion to intervene and related correspondence with team (defer) (.6); legal research regarding claims related issues and prepare research notes regarding same (Group 1) (1.5).  Claims Administration & Objections
11/23/2021	AW	1.20	Attention to approval from J. Wine and email claimants order modifying schedule (Group 1) (.1); follow up with J. Wine regarding database email and respond to claimant (7749 Yates; 2909 E 78th; 7549 Essex; 8047 Manistee)

Date	Indiv	Hours	Description
			(.1); update claimant's email and related email response (7749 Yates) (.3); draft position statement and related email to J. Wine (Group 1) (.3); proofread motion for extension, related email to J. Wine, finalize, and file motion (all) (.4).
			Claims Administration & Objections
11/23/2021	JRW	1.40	Confer with A. Porter and K. Duff regarding expert deposition and scheduling, and related correspondence with claimants' counsel (Group 1) (.3); attention to claimant inquiry and related email to vendor (all) (.1); exchange correspondence with claimants' counsel regarding third-party discovery (sole lien) (.1); prepare riders for third party subpoenas to loan originators and title companies and related correspondence with team (sole lien) (.9).
			Claims Administration & Objections
	KMP	0.40	Review online banking records to confirm deposit of insurance settlement check to Receiver's account relating to claim, and related communications with J. Wine and claimant's counsel regarding instructions for settlement payment (7110 Cornell).
			Claims Administration & Objections
11/24/2021	AEP	1.50	Update spreadsheet of single-lien properties to include additional data points after reviewing underlying loan documentation and documents produced in response to subpoenas, then edit and revise proposed riders to subpoenas being issued to loan originators and title companies (sole lien) (1.4); read and edit draft rider (sole lien) (.1).
			Claims Administration & Objections
	JRW	0.50	Confer with A. Porter and M. Rachlis regarding third-party discovery and revisions to document riders and related correspondence to claimants' counsel (sole lien) (.3); exchange correspondence regarding draft stipulation and related correspondence with court's clerk (defer) (.2).
			Claims Administration & Objections
	MR	0.50	Review and follow up regarding subpoenas and related follow up with J. Wine and others regarding revisions (sole lien).
			Claims Administration & Objections
11/29/2021	JRW	3.00	Review redlines of draft subpoenas from claimants' counsel and related correspondence with same (sole lien) (.5); correspondence with claimants' counsel and SEC regarding expert deposition (Group 1) (.1); telephone conference with K. Duff regarding process for resolution of claims (sole lien) (.2); correspondence to A. Porter regarding third party subpoenas (sole lien) (.2); review and evaluate proofs of claim (sole lien) (1.8); confer with K. Duff and M. Rachlis regarding proposed revisions to subpoenas (sole lien) (.2).
			Claims Administration & Objections

Date	Indiv	Hours	Description
11/29/2021	KMP	0.50	Communications with J. Wine regarding additional third-party subpoenas to be issued and prepare draft subpoenas (sole lien). Claims Administration & Objections
	MR	0.30	Attention to subpoenas and follow up regarding issues on subpoenas with J. Wine (sole lien). Claims Administration & Objections
11/30/2021	AEP	1.40	Teleconference with J. Wine and K. Duff regarding basis for issuance of subpoenas in connection with acquisition loans (7110 Cornell; 6749 Merrill) and refinancing loans; review files for documents likely to lead to information pertaining to loan underwriting and closing issues, and supply information to J. Wine in connection with issuance of subpoenas (1017 W 102nd; 417 Oglesby; 7925 Kingston; 8403 Aberdeen; 8405 Marquette; 8800 Ada; 9212Parnell; 10012 LaSalle; 3723 W 68th; 406 E 87th; 61 E 92nd; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8432 Essex; 8517 Vernon; 3213 Throop; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 8346 Constance; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 2129 W 71st; 9610 Woodlawn; 5437 Laflin; 1516 E 85th; 2136 W 83rd; 7922 Luella; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8529 Rhodes; 11318 Church) (1.1); additional research regarding identity of title company through whom EB South Chicago 2 refinancing was closed and communications with J. Wine regarding same (10012 LaSalle; 3723 W 68th; 406 E 87th; 61 E 92nd; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8432 Essex; 8517 Vernon; 3213 Throop; 6554 Rhodes; 6825 Indiana; 7210 Vernon; 11318 Church) (.3). Claims Administration & Objections
	AW	0.80	Confer with K. Pritchard and J. Wine regarding issuance of subpoenas, draft subpoenas, further attention to revisions and exchanges regarding issuance of subpoenas (sole lien). Claims Administration & Objections
	JRW	4.10	Continued review of claims documentation (sole lien) (.8); research regarding title companies and loan originators and related communications with A. Watychowicz regarding subpoenas (sole lien) (1.4); review and sign-off on joint status report (Group 1) (.1); telephone conference with A. Porter regarding subpoena riders and related revision of same (sole lien) (1.1); revise subpoenas and prepare cover letters (sole lien) (.3); exchange correspondence with claimants' counsel and telephone conferences with M. Rachlis and K. Pritchard regarding finalization and service of subpoenas (sole lien) (.4). Claims Administration & Objections
	KMP	2.40	Review, revise and finalize third-party subpoenas and riders, prepare certified mail transmittals, and related communications with K. Duff, M. Rachlis, A.

Date	Indiv	Hours	Description		
			Porter, J. Wine, and A.Watychowicz (sole lien).		
			Claims Administration & Objections		
11/30/2021	MR	0.80	Review and provide edits to subpoena riders (sole lien) (.5); conferences and follow up with J. Wine, K. Duff and K. Pritchard regarding subpoenas (sole lien) (.3).		
			Claims Administration & Objections		
SUBTOTAL:				1[07.70	29347.00]

#### Status Reports

11/1/2021	AW	1.80	Attention to draft status report and email J. Wine regarding proposed revisions (.5); prepare exhibits to status report (.4); finalize motion and related email exchange with J. Wine (.4); e-file motion and serve as per service list (.5).		
			Status Reports		
	JRW	0.70	Work with A. Watychowicz on finalizing third quarter status report and exhibits.		
			Status Reports		
SUBTOTAL:				[ 2.50	434.00]

#### Tax Issues

11/1/2021	KMP	0.20	Communicate with K. Duff regarding follow up on tax notices for various entities from federal authority (SSPH Portfolio 1 LLC; SSPH Holdco 1 LLC; SSDF1 Holdco 1 LLC; SSDF3 Holdco 1 LLC; SSDF3 Holdco 2 LLC; SSDF4 Holdco 1 LLC; SSDF4 Holdco 2 LLC; SSDF4 Holdco 3 LLC; South Side Development Fund 1 LLC; South Side Development Fund 3 LLC; South Side Development Fund 4 LLC).		
			Tax Issues		
11/8/2021	JRW	0.20	Exchange correspondence with K. Duff and A. Porter regarding tax liens against manager entities (defer).		
			Tax Issues		
	KMP	0.20	Communicate with K. Duff regarding response from accountant regarding tax notices for various entities and attention to related correspondence to accountant (SSPH Portfolio 1 LLC; SSPH Holdco 1 LLC; SSDF1 Holdco 1 LLC; SSDF3 Holdco 1 LLC; SSDF3 Holdco 2 LLC; SSDF4 Holdco 1 LLC; SSDF4 Holdco 2 LLC; SSDF4 Holdco 3 LLC; South Side Development Fund 1 LLC; South Side Development Fund 3 LLC; South Side Development Fund 4 LLC).		
			Tax Issues		



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
11/12/2021	KMP	0.20	Prepare email correspondence to accountant regarding various notices to EB entities from tax authority (SSDF1, SSDF4, SSDF4 Holdco 3, SSDF3 Holdco 2).		
			Tax Issues		
11/16/2021	KMP	0.90	Review collection notice relating to corporation income taxes for EB entity, prepare draft response, and related communications with K. Duff (3400 Newkirk LLC) (.7); communicate with accountant, tax administrator and EB team regarding tax form for soldproperty (638 Avers) (.2).		
			Tax Issues		
11/22/2021	KMP	0.20	Briefly review and forward notices from tax authority regarding EB entities (SSDF3; 1516 E 85th Place Associates).		
			Tax Issues		
11/30/2021	KMP	0.20	Prepare email correspondence to accountant, K. Duff, J. Wine, and A. Watychowicz regarding collection efforts relating to tax notices from federal authority for EB entities (SSDF3 Holdco 2 LLC; SSDF4 Holdco 3 LLC).		
			Tax Issues		
SUBTOTAL:					
				[ 2.10	318.00]
				184.60	\$43,593.00

Other Charges

Description

Asset Analysis & Recovery

Postage for certified mail delivery of subpoenas 48.96

SUBTOTAL: [ 48.96]

Business Operations

Photocopies for November 2021 11.80

Software license fees for November 2021 277.41  
(Summit Hosting, \$181.41; Google Suite, \$96)

SUBTOTAL: [ 289.21]

Claims Administration & Objections

Online research for November 2021 450.87

SUBTOTAL: [ 450.87]

Total Other Charges \$789.04

Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Jodi Wine	67.70	260.00	\$17,602.00
Ania Watychowicz	19.90	140.00	\$2,786.00
Justyna Rak	32.60	140.00	\$4,564.00
Kathleen M. Pritchard	25.90	140.00	\$3,626.00
Andrew E. Porter	13.40	390.00	\$5,226.00
Michael Rachlis	25.10	390.00	\$9,789.00

**SUMMARY**

Legal Services	\$43,593.00
Other Charges	\$789.04
<b>TOTAL DUE</b>	<b>\$44,382.04</b>

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# Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
SUITE 900  
CHICAGO, ILLINOIS 60605

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

January 28, 2022

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

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

Fed. I.D. No. 61-1421786  
Invoice No. 6622141

Legal Fees for the period December 2021	\$31,964.00
Expenses Disbursed	\$667.14
	<hr/>
<b>Due this Invoice</b>	<b>\$32,631.14</b>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
<u>Accounting/Auditing</u>					
12/15/2021	KMP	0.20	Record recent transactions to Receiver's bank account ledgers (all).		
			Accounting/Auditing		
SUBTOTAL:				[ 0.20	28.00]
<u>Asset Analysis &amp; Recovery</u>					
12/3/2021	JRW	0.40	Exchange correspondence with A. Porter regarding subpoena and related review of document production (defer).		
			Asset Analysis & Recovery		
12/6/2021	KMP	0.80	Review bank documents, emails and other materials relating to status of asset holder's account and related communications with K. Duff (4533 Calumet).		
			Asset Analysis & Recovery		
12/7/2021	JRW	1.60	Review subpoena responses and related correspondence (defer) (.3); prepare subpoena (defer) (.9); work with K. Pritchard to finalize subpoenas and cover letters (defer) (.4).		
			Asset Analysis & Recovery		
	KMP	1.50	Review materials produced by third party to identify address for subpoena to additional third party (defer) (.5); prepare subpoenas and related transmittal letters to third parties and related communications with J. Wine (defer) (1.0).		
			Asset Analysis & Recovery		
12/8/2021	JRW	0.70	Additional factual research and related telephone conference with subpoenaed party (defer) (.3); correspondence with K. Pritchard regarding subpoenas (defer) (.2); correspondence with K.Duff regarding response to subpoena (defer) (.1); correspondence with K. Pritchard regarding notice of subpoenas (defer) (.1).		
			Asset Analysis & Recovery		
	KMP	1.30	Revise, finalize, and prepare transmittals for subpoenas to third parties (defer) (.6); prepare and serve notice of subpoenas and related communication with J. Wine (defer) (.5); attention to communications with K. Duff and J. Wine regarding reissuance of subpoena to third party (defer) (.2).		
			Asset Analysis & Recovery		

Date	Indiv	Hours	Description
12/9/2021	AW	0.30	Research regarding credit card statements (defer). Asset Analysis & Recovery
	KMP	0.20	Revise subpoena to third party, and related communications with J. Wine (defer). Asset Analysis & Recovery
12/10/2021	JRW	0.50	Exchange correspondence with K. Duff regarding potential subpoena and related research (defer) (.2); revise draft subpoena riders and related correspondence to A. Porter (defer) (.3). Asset Analysis & Recovery
	KMP	0.40	Communications with J. Wine regarding rider for subpoena to third party (defer) (.1); research discovery files and emails relating to request for documents to third party and related communications with K. Duff and A. Watychowicz (defer) (.3). Asset Analysis & Recovery
12/14/2021	KMP	0.30	Confer with K. Duff regarding origination of funds in asset holder accounts and related review of documents received from asset holder (defer). Asset Analysis & Recovery
12/15/2021	KMP	0.40	Review documents received from asset holder regarding origination of funds in asset holder account and timeline for transfer of funds to Receivership account, and related communication with K. Duff (defer). Asset Analysis & Recovery
12/17/2021	KMP	0.20	Review materials relating to in-process subpoenas to third parties and communicate with J. Wine as to status (defer). Asset Analysis & Recovery
12/20/2021	AW	0.20	Review supplemental production from bank and related email to K. Duff (all). Asset Analysis & Recovery

SUBTOTAL: [ 8.80 1616.00]

Asset Disposition

12/1/2021	AEP	0.40	Edit and revise draft purchase and sale contract for sale of receivership property following receipt of additional information from property manager and receivership broker, add exhibits, request updated title commitment, and transmit proposed final draft (7109 Calumet).
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<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Asset Disposition
12/1/2021	KMP	0.20	Further communications with J. Rak regarding distribution of proceeds from sale of properties (6160 MLK; 8100 Essex) (.1); further communications with J. Rak regarding issues relating to review of bank statements in connection with reconciliation of property closings (all except 7109 Calumet) (.1).
			Asset Disposition
12/2/2021	KMP	0.50	Participate in conference call with J. Rak and bank representative regarding issues relating to review of bank statements in connection with reconciliation of property closings, and related separate call with J. Rak (all except 7109 Calumet).
			Asset Disposition
12/5/2021	MR	2.50	Research on various issues and work on draft response on Rule 54(b) issues (6949 Merrill; 7600 Kingston; 7656 Kingston).
			Asset Disposition
12/6/2021	JR	0.40	Locate and organize property account statements related to the sale of property (7109 Calumet) (.2); communication with real estate broker providing property financial statements (7109 Calumet) (.2).
			Asset Disposition
	MR	3.00	Further review and research regarding Rule 54(b) and drafting response brief (6949 Merrill; 7600 Kingston; 7656 Kingston).
			Asset Disposition
12/7/2021	JR	1.00	Review email from K. Duff and J. Wine, analyze and produce information regarding property balances (single family).
			Asset Disposition
	JRW	0.50	Review correspondence from claimants' counsel and study allocation of single family portfolio sale proceeds and fund balance reports and related correspondence with K. Pritchard and J. Rak (single family).
			Asset Disposition
	MR	2.00	Further work and review of research regarding response on rule 54 motion (6949 Merrill; 7600 Kingston; 7656 Kingston).
			Asset Disposition
12/8/2021	JR	0.70	Update electronic property folder with financial property reports (7109 Calumet) (.2); update certified rent roll in preparation for future closing (7109 Calumet) (.5).
			Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/8/2021	MR	1.30	Further work on opposition to Rule 54(b) and follow up regarding same (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition
12/9/2021	JR	0.50	Communication with counsel requesting an updated release related to property and judgment payoff (7748 Essex) (.3); further communication with A. Porter regarding the release related to judgment payoff (7748 Essex) (.1); review email from real estate broker requesting property operating report relating to future sale of property (7109 Calumet), further communication with E. Duff requesting operating report for property (7109 Calumet) (.1).  Asset Disposition
12/10/2021	AEP	0.70	Teleconference with J. Wine and K. Duff regarding allocation of sales proceeds of single-family homes and reconciliation with amounts held in corresponding bank accounts (single family).  Asset Disposition
	AW	1.10	Study opposition to motion for final judgment and related email to M. Rachlis (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition
	JR	0.60	Conference call with K. Duff, A. Porter and J. Wine regarding single family allocations (single family).  Asset Disposition
	JRW	1.70	Exchange correspondence with K. Duff and J. Rak regarding fund balances (single family) (.1); conference call with J. Rak, K. Duff and A. Porter regarding single family fund balances (single family) (1.2); review exhibits to status reports setting forth adjustments to fund balances and related correspondence with K. Pritchard (all) (.4).  Asset Disposition
	MR	0.60	Further work and edits on Rule 54(b) motion (6949 Merrill; 7600 Kingston and 7656 Kingston).  Asset Disposition
12/11/2021	AEP	0.20	Correspondence with K. Pritchard regarding reconciliation of agency commissions, compare personal records with EquityBuild master property list, and confirm accuracy of information submitted to Receiver (all).  Asset Disposition
	MR	1.00	Further review and work on brief regarding Rule 54 issues (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/13/2021	JRW	1.40	Research and correspondence with K. Pritchard regarding fund balances for sold properties (single family) (.7); telephone conference with claimants' counsel regarding allocation of sales proceeds to portfolio and related follow-up email (single family) (.6); review certificate of publication and related correspondence (7109 Calumet) (.1).  Asset Disposition
	KMP	0.30	Analyze spreadsheet relating to property account balances and related communication with J. Wine (single family).  Asset Disposition
	MR	0.50	Review comments on opposition (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition
12/15/2021	KMP	0.20	Communicate with J. Rak regarding status of efforts to compile bank statements for all property accounts for reconciliation of property sales (all).  Asset Disposition
12/16/2021	JRW	0.20	Exchange correspondence with claimants' counsel regarding allocation of proceeds to closed properties and related communication with J. Rak regarding preparation of updated spreadsheet (single family).  Asset Disposition
	MR	0.30	Attention to contract response (7109 Calumet).  Asset Disposition
12/17/2021	AEP	0.50	Teleconference with K. Duff regarding submission of bids on receivership property and proposed response (7109 S Calumet).  Asset Disposition
	MR	0.20	Attention to bids on sale of property (7109 Calumet).  Asset Disposition
12/20/2021	AEP	0.30	Teleconference with K. Duff, M. Rachlis, and receivership broker regarding strategy in connection with auction of receivership property (7109 S Calumet).  Asset Disposition
	AW	1.90	Work on draft opposition to motion, related email exchanges with K. Duff, M. Rachlis and J. Wine, finalize and file with court (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
12/20/2021	JR	0.80	Review email from J. Wine and requesting updates to allocations for single family home portfolio and update closed property spreadsheet regarding same (single family).  Asset Disposition
	JRW	0.50	Review and revise draft response to motion to designate interlocutory appeal as final order (6949 Merrill; 7600 Kingston; 7656 Kingston) (.4); review final revisions to motion and confer with A. Watychowicz (6949 Merrill; 7600 Kingston; 7656 Kingston) (.1).  Asset Disposition
	MR	0.80	Meeting on bids related to sale of property (7109 Calumet) (.3); finalize issues on brief regarding motion (6949 Merrill; 7600 Kingston; 7656 Kingston) (.5).  Asset Disposition
12/21/2021	JR	0.20	Exchange communication with J. Wine relating to single family sale price allocations and update closed property spreadsheet regarding same (single family).  Asset Disposition
12/27/2021	KMP	0.20	Download and forward copy of mandate issued by Seventh Circuit relating to appeal to EB team (6949 Merrill; 7600 Kingston; 7656 Kingston).  Asset Disposition
12/28/2021	JRW	1.60	Draft fifteenth motion to confirm sale (7109 Calumet).  Asset Disposition
12/29/2021	AW	0.80	Research regarding current and past publications and agreements (7109 Calumet).  Asset Disposition
	JRW	0.20	Work with A. Watychowicz on locating exhibits to motion to confirm sale of real estate asset (7109 Calumet).  Asset Disposition
12/30/2021	AW	1.30	Revisions to motion to confirm sale, work with K. Duff and J. Wine to finalize motion, file the motion and serve as per service list (7109 Calumet).  Asset Disposition
	JRW	2.10	Exchange correspondence with broker regarding publication notices (7109 Calumet) (.1); review and revise draft motion to confirm sale (7109 Calumet) (1.2); search archived email for certificate of publication (7109 Calumet) (.1); draft proposed order confirming sale (7109 Calumet) (.4); work with A. Watychowicz on finalizing and filing motion and exhibits (7109 Calumet) (.3).  Asset Disposition

Date	Indiv	Hours	Description
12/30/2021	MR	0.30	Attention to issues regarding letter of credit for property sale and attention to motion to confirm sale (7109 Calumet).  Asset Disposition
SUBTOTAL:			[33.50                      9324.00]

Business Operations

12/1/2021	JRW	0.40	Attention to collections notice and review and revise correspondence providing notice of receivership (1401 W 109th).  Business Operations
12/3/2021	JR	0.20	Follow up correspondence with account analyst requesting property insurance endorsement (4611 Drexel) (.1); follow up correspondence with the title company requesting an update (on title indemnity holdback) for previously sold property (7748 Essex) (.1).  Business Operations
	JRW	0.30	Review and revise notice of receivership to third party (defer) (.1); exchange correspondence with plaintiff's counsel in state court matter (4533 Calumet) (.1); correspondence with court clerk and plaintiff's counsel regarding extension of stay in state court action (defer) (.1).  Business Operations
12/8/2021	JR	1.70	Review bank monthly statements and verify net proceeds from sales of properties (all).  Business Operations
12/10/2021	AW	0.40	Email exchange and call with K. Pritchard regarding credit card records and related emails to K. Duff (defer).  Business Operations
	JRW	0.20	Review gas company collection notice and review and revise notice letter to gas company (1401 W 109th).  Business Operations
12/17/2021	JR	3.20	Analyze bank statements and confirm net proceeds from sale of all properties (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210

Date	Indiv	Hours	Description
			Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laffin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham).
			Business Operations
12/20/2021	JR	1.90	Analyze banking statements for closed properties and confirm proceeds (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laffin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham).
			Business Operations
12/21/2021	JRW	0.20	Telephone conference with counsel for plaintiff in state court litigation regarding stay of proceedings (4533 Calumet) (.1); telephone conference with insurance adjuster regarding coverage for claim (4533 Calumet) (.1).
			Business Operations
12/28/2021	KMP	1.60	Review financial records and email communications, prepare spreadsheet tracking insurance refunds for sold properties, and related communications with K. Duff, J. Wine, E. Duff, J. Rak, and representatives from insurance brokerage (1700 Juneway; 4533 Calumet; 5001 Drexel; 5450 Indiana; 7749 Yates; 6437 Kenwood; 1414 E 62nd; 8100 Essex; 7301 Stewart; 7500 Eggleston; 3030 E 79th; 2909 E 78th; 7549 Essex; 8047

Date	Indiv	Hours	Description
			Manistee; 1017 W 102nd; 1516 E 85th; 2136 W 83rd; 417 Oglesby; 7922 Luella; 7925 Kingston; 7933 Kingston; 8030 Marquette; 8104 Kingston; 8403 Aberdeen; 8405 Marquette; 8529 Rhodes; 8800 Ada; 9212 Parnell; 10012 LaSalle; 11318 Church; 3213 Throop; 3723 W 68th; 406 E 87th; 61 E 92nd; 6554 S Rhodes Avenue; 6825 Indiana; 7210 Vernon; 7712 Euclid; 7953 Woodlawn; 8107 Kingston; 8346 Constance; 8432 Essex; 8517 Vernon; 2129 W 71st; 9610 Woodlawn; 5437 Laffin; 6759 Indiana; 7300 St Lawrence; 7760 Coles; 1401 W 109th; 310 E 50th; 6807 Indiana; 8000 Justine; 8107 Ellis; 8209 Ellis; 8214 Ingleside; 5955 Sacramento; 6001 Sacramento; 7026 Cornell; 7237 Bennett; 7834 Ellis; 4520 Drexel; 4611 Drexel; 6749 Merrill; 7110 Cornell; 1131 E 79th; 6217 Dorchester; 6250 Mozart; 638 Avers; 701 S 5th; 7024 Paxton; 7255 Euclid; 3074 Cheltenham; 7625 East End; 7635 East End; 7750 Muskegon; 7201 Constance; 6160 MLK; 2736 W 64th; 4315 Michigan; 6355 Talman; 6356 California; 7051 Bennett; 7201 Dorchester; 7442 Calumet; 7508 Essex; 7546 Saginaw; 7600 Kingston; 7656 Kingston; 7701 Essex; 7748 Essex; 7957 Marquette; 816 Marquette; 8201 Kingston; 8326-58 Ellis; 11117 Longwood; 6949 Merrill; 7927-49 Essex; 1422 E 68th; 2800 E 81st; 4750 Indiana; 5618 MLK; 6554 Vernon; 7450 Luella; 7840 Yates; 431 E 42nd; 1102 Bingham).
			Business Operations
12/29/2021	JRW	0.20	Review docket for state court matter and related correspondence to counsel for plaintiff regarding entry of stay (4533 Calumet).
			Business Operations
SUBTOTAL:			[10.30                      1598.00]
<u>Case Administration</u>			
12/6/2021	KMP	0.50	Communications with J. Rak and bank representative regarding upcoming training on balance reporting in online banking platform and create profile for J. Rak in online banking platform.
			Case Administration
12/10/2021	JRW	0.40	Confer with A. Watychowicz relating to counsel appearances and related searches of transcripts of proceedings.
			Case Administration
12/14/2021	JRW	0.50	Conference call with K. Duff and government representatives (.3); conference with K. Duff relating to estate issue (.2).
			Case Administration
12/16/2021	AW	0.70	Prepare pleadings for upload to receivership webpage and email request to IT vendor.
			Case Administration

Date Indiv Hours Description

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SUBTOTAL:

[ 2.10

402.00]

Claims Administration & Objections

12/1/2021	AEP	0.20	Teleconference with J. Wine regarding location of documents and information pertaining to origination of loans from institutional and private lenders (sole lien).
			Claims Administration & Objections
AW		0.40	Prepare link containing claims files and related email to claimant (7255 Euclid) (.2); attention to notices and related email with J. Wine (1131 E 79th; 6250 Mozart) (.2).
			Claims Administration & Objections
JRW		1.50	Correspondence with accountant, K. Pritchard and A. Watychowicz regarding IRS notices and claims against properties (1131 E79th; 6250 Mozart) (.4); attention to claimant inquiry (all) (.4); review transcript of proceedings and provide analysis to K. Duff and M. Rachlis (sole lien) (.5); draft response to claimants' counsel regarding court's order and schedule (sole lien) (.2).
			Claims Administration & Objections
KMP		0.30	Prepare correspondence and transmittal to utility company providing notice of Receivership and advising of anticipated motion for court approval to pay past due utility invoice from sale proceeds, and related communications with J. Wine (1401 W 109th).
			Claims Administration & Objections
12/2/2021	AW	0.20	Email exchange regarding proposed email on discovery issues (8100 Essex; 7834 Ellis; 638 Avers; 7748 Essex) (.1); attention to exchange regarding response to correspondence and related email to K. Duff (2909 E 78th; 7549 Essex; 8047 Manistee; 11117 Longwood; 1131 E 79th) (.1).
			Claims Administration & Objections
JRW		2.70	Review records for database searches regarding loan originations and related telephone conferences with A. Porter and A. Watychowicz regarding plan for searching and downloading search results (all except Group 1).
			Claims Administration & Objections
KMP		0.30	Prepare draft response to inquiry from claimant regarding beneficiary issues relating to claims and related communication with K. Duff (11117 Longwood; 1131 E 79th; 2909 E 78th; 7549 Essex; 8047 Manistee).
			Claims Administration & Objections

Date	Indiv	Hours	Description
12/2/2021	MR	0.20	Follow up regarding issues regarding sole lien claim process (sole lien). Claims Administration & Objections
12/3/2021	AW	2.90	Continue work on spreadsheet containing closing information and related email with J. Wine (all except Group 1) (2.4); respond to email from claimant regarding fund investment (2909 E 78th; 7549 Essex; 8047 Manistee) (.1); email exchange with K. Duff and J. Wine regarding confidentiality issues and discovery process and related email to claimant (8100 Essex; 7834 Ellis; 638 Avers; 7748 Essex) (.2); email claimant regarding standard discovery (7026 Cornell) (.1); respond to correspondence from claimant (2909 E 78th; 7549 Essex; 8047 Manistee; 11117 Longwood; 1131 E 79th) (.1). Claims Administration & Objections
	JRW	0.80	Attention to claimant inquiries (all) (.2); correspondence with K. Duff and M. Rachlis and claimants' counsel regarding court's order (sole lien) (.2); correspondence with K. Duff and telephone conference with A. Watychowicz regarding archived email files and related review of spreadsheet (all except Group 1) (.4). Claims Administration & Objections
12/6/2021	AW	0.50	Attention to correspondence from claimants regarding change of address and update spreadsheets (Group 1) (.2); correspond with K. Duff regarding power of attorney issues (2909 E 78th; 7549 Essex; 8047 Manistee; 11117 Longwood; 1131 E 79th) (.1); communicate with J. Wine regarding work on completion of closing contact list (all except Group 1)(.1); respond to claimant regarding grouping issue (2909 E 78th; 7549 Essex; 8047 Manistee) (.1). Claims Administration & Objections
12/7/2021	AW	4.00	Draft response to claimant regarding secondary email issues (8100 Essex; 7834 Ellis; 638 Avers; 7748 Essex) (.1); continue work on completion of closing contact list (all except Group 1) (3.9). Claims Administration & Objections
	JRW	0.40	Attention to claimant inquiry (all) (.1); exchange correspondence regarding motion to intervene (defer) (.1); confer with A. Watychowicz regarding EquityBuild document searches (all) (.1); correspondence with counsel regarding subpoena (sole lien)(.1). Claims Administration & Objections
	KMP	0.90	Confer with K. Duff, J. Wine, and J. Rak regarding claimant's counsel's request for accounting of sale proceeds for single family homes, and research related emails, spreadsheets, and financial documents (single family). Claims Administration & Objections

Date	Indiv	Hours	Description
12/7/2021	MR	0.20	Follow up on status regarding stipulation on motion to intervene (defer). Claims Administration & Objections
12/8/2021	AW	2.30	Continue work on completion of closing contact list (all except Group 1). Claims Administration & Objections
	JRW	0.30	Exchange correspondence with counsel for third party regarding response to subpoena and prepare additional information regarding secured collateral (sole lien). Claims Administration & Objections
12/9/2021	AW	0.30	Responses to emails from claimants regarding claims process and access to claims documents (11117 Longwood; 1131 E 79th). Claims Administration & Objections
	MR	0.30	Attention to submission regarding Group 1 (Group 1). Claims Administration & Objections
12/10/2021	JRW	3.00	Review expert report and prepare analysis of same (Group 1) (1.6); correspondence with K. Duff, A. Porter and SEC (Group 1) (.1); confer with A. Watychowicz regarding claimants and related investigation (all) (.2); correspondence with counsel for third party regarding subpoena and related correspondence with M. Rachlis (sole lien) (.2); search and review documents in EB records database (all except Group 1) (.9). Claims Administration & Objections
	KMP	0.30	Prepare notice letter and transmittal to collections agency regarding utility bill and related communications with J. Wine (1401 W 109th). Claims Administration & Objections
	MR	0.20	Attention to exchange with J. Wine regarding subpoenas related to sole lien process (sole lien) (.1); attention to e-mail regarding expert report for Group 1 (Group 1) (.1). Claims Administration & Objections
12/11/2021	MR	2.30	Review and study expert report for Group 1 (Group 1) (2.0); attention to e-mail and communicate regarding discovery on sole lien claims (sole lien) (.3). Claims Administration & Objections
12/12/2021	AEP	3.20	Read expert report, review relevant statutory authority cited therein, and prepare notes (Group 1). Claims Administration & Objections



Date	Indiv	Hours	Description
12/12/2021	MR	0.20	Attention to responses to discovery (sole lien). Claims Administration & Objections
12/13/2021	AW	0.40	Draft email response to claimant and related correspondence with K. Duff and J. Wine (Group 1) (.2); communicate with J. Wine regarding proposed response to claimant (2909 E 78th; 7549 Essex; 8047 Manistee) (.1); email response and follow up email to claimant regarding claim (7748 Essex) (.1). Claims Administration & Objections
	JRW	0.90	Attention to claimant inquiries (all) (.2); review claimant's discovery responses (sole lien) (.3); analyze data regarding claims against funds and related correspondence with K. Duff (single family) (.4). Claims Administration & Objections
	MR	2.00	Further review of disclosure in preparation of upcoming meeting and deposition (Group 1) (1.7); attention to subpoena on single lien claims (sole lien) (.3). Claims Administration & Objections
12/14/2021	AEP	0.90	Teleconference with J. Wine, counsel for EBF mortgagees, and SEC (Group 1). Claims Administration & Objections
	JRW	1.30	Conference call with claimants' counsel, SEC and A. Porter (Group 1) (.9); telephone conference with claimants' counsel regarding deposition exhibits (Group 1) (.2); legal research (all) (.1); correspondence with claimants' counsel regarding notice of deposition and service on Group 1 claimants (Group 1) (.1). Claims Administration & Objections
12/15/2021	JRW	1.00	Correspondence with counsel for loan originator and title companies (sole lien) (.3); correspondence and telephone conference with counsel for third party regarding identification of loans and custodians (sole lien) (.2); work with A. Watychowicz on preservation of documents from EB database (all except Group 1) (.3); telephone conference with counsel for title company regarding subpoena (sole lien) (.2). Claims Administration & Objections

Date	Indiv	Hours	Description
12/16/2021	AW	0.20	Attention to document production from title company and related email exchanges with J. Wine (sole lien). Claims Administration & Objections
12/17/2021	AW	0.20	Email exchange with J. Wine regarding and respond to claimant regarding modified schedule for claims process and follow up email relating to claims process (2909 E 78th; 7549 Essex; 8047 Manistee). Claims Administration & Objections
12/19/2021	MR	0.50	Attention to upcoming deposition (Group 1). Claims Administration & Objections
12/20/2021	AEP	6.00	Teleconference with M. Rachlis and K. Duff regarding (issues to be pursued in connection with) deposition of lender's expert witness in Group 1 claims process (Group 1) (.2); attend Zoom deposition of expert witness and teleconference with K. Duff, J. Wine, and M. Rachlis regarding deposition (Group 1) (5.8). Claims Administration & Objections
	JRW	0.60	Exchange correspondence with K. Duff, A. Porter and claimants' counsel regarding upcoming expert deposition (Group 1) (.2); confer with A. Watychowicz regarding deposition exhibits (Group 1) (.1); conference with K. Duff and A. Porter regarding expert deposition (Group 1) (.3). Claims Administration & Objections
	MR	0.80	Further preparation for meeting on upcoming deposition and related conference (Group 1) (.5); further attention to deposition results (Group 1) (.3). Claims Administration & Objections
12/22/2021	AW	1.80	Call with J. Wine regarding database issues (all) (.9); communicate with K. Duff and J. Wine regarding proposed response and respond to claimant's counsel inquiry regarding claims documents (4533 Calumet) (.2); research claim and respond to claimant's inquiry regarding sold properties (7508 Essex) (.2); research claim and claimant's contact information, update claimant's email address, and related email response (2909 E 78th; 7549 Essex; 8047 Manistee) (.3); review transcripts and deposition exhibits and related email to J. Wine (Group 1) (.2). Claims Administration & Objections
	JRW	0.60	Attention to claimant and counsel inquiries (.1); confer with A. Watychowicz regarding deposition exhibits (Group 1) (.1); correspondence with counsel for title company regarding document production and privilege objections and related email exchange with K. Duff and M. Rachlis (sole lien) (.4). Claims Administration & Objections

Date	Indiv	Hours	Description
12/22/2021	MR	0.60	Attention to issues regarding privilege claim and related follow up (sole lien) (.3); attention to stipulation on motion to intervene and follow up email and outreach (defer) (.3).  Claims Administration & Objections
12/23/2021	AW	0.60	Communicate with K. Duff and J. Wine regarding repeated emails from claimant (all) (.1); attention to response to subpoena and related communication with J. Wine (sole lien) (.2); communicate with K. Duff and J. Wine regarding proposed response to claimant and related email response (7442 Calumet; 4315 Michigan) (.2); email J. Wine regarding closing contact information (all except Group 1) (.1).  Claims Administration & Objections
	JRW	3.90	Attention to claimant email and voicemail inquiries (all) (.9); correspondence with K. Duff, M. Rachlis, and A. Watychowicz regarding correspondence to claimants regarding position statement (Group1) (.1); conduct database searches for claims process (all except Group 1) (2.9).  Claims Administration & Objections
	MR	0.20	Attention to issues regarding position statement (Group 1).  Claims Administration & Objections
12/27/2021	JRW	3.30	Telephone conference with K. Duff regarding EB document review for claims process (all except Group 1) (.3); exchange correspondence with vendor regarding claimants' request for additional information (all) (.1); confer with vendor regarding database preservation options (all) (.1); conduct database searches for claims process (all except Group 1) (2.8).  Claims Administration & Objections
12/28/2021	JRW	1.30	Telephone conferences with claimants' counsel regarding EB document database and related correspondence with K. Duff (all) (.4); multiple conferences with K. Duff regarding database access and cost issues (all) (.5); telephone conference and related email exchanges with vendor regarding potential extension of database access for all participants (all) (.4).  Claims Administration & Objections
12/29/2021	AW	2.40	Prepare claims files and share with claimant's counsel (4533 Calumet) (.2); responses to several email from claimant and follow up regarding same with K. Duff (2909 E 78th; 7549 Essex; 8047 Manistee) (.3); attention to emails from claimants sent to group email and respond to each claimant separately (Group 1) (.3); respond to claimant's counsel questions regarding claims documents, deposition transcript, and position statement (Group 1) (.1); email exchanges with J. Wine regarding encryptions in database (all) (.2); call with J. Wine regarding database issues and work on extracting messages from database (all) (.9); draft email regarding extension of database access and related email exchanges with K. Duff and J. Wine (all) (.4).  Claims Administration & Objections

Date	Indiv	Hours	Description
12/29/2021	JRW	2.00	Attention to claimant inquiries (all) (.4); exchange correspondence with A. Watychowicz, K. Duff, and vendor regarding encrypted documents in database (all) (.1); exchange correspondence with vendor regarding extending access to EB documents database for all claimants and related telephone conference with claimants' counsel (all) (.2); work with A. Watychowicz regarding documents database, text files and email archives and related review of database training materials (all) (1.1); <b>correspondence with SEC (Group 1) (.2).</b>  Claims Administration & Objections
12/30/2021	AW	0.70	Work with K. Duff and J. Wine on update email to claimants regarding access to database and related email to claimants and counsel (all).  Claims Administration & Objections
	JRW	0.60	Work with A. Watychowicz and K. Duff on drafting of email to claimants regarding database extension (all) (.3); attention to claimant inquiry (all) (.3).  Claims Administration & Objections
12/31/2021	JRW	0.30	Review documents produced pursuant to subpoena and related correspondence to claimants' counsel (sole lien).  Claims Administration & Objections
SUBTOTAL:			[61.00      15930.00]

Tax Issues

12/1/2021	KMP	0.20	Efforts to follow up with accountant regarding collection efforts relating to tax notices from federal authority for EB entities, and related communications with K. Duff, J. Wine, and A. Watychowicz.  Tax Issues
12/2/2021	KMP	2.30	Attention to voicemail message from accountant regarding collection efforts relating to tax notices from federal authority for EB entities and prepare email response (.2); prepare draft notice letter relating to tax collection notices and related communications with K. Duff and J. Wine (.4); begin reviewing emails and other materials relating to status of tax notices from government and/or collection agencies directed to various EB entities to prepare spreadsheet relating to same (1.7).  Tax Issues

Date	Indiv	Hours	Description
12/3/2021	KMP	3.60	Finalize and prepare transmittal of notice letter relating to tax collection notices and related communications with K. Duff and J. Wine (.4); continue review of emails and other materials relating to status of tax notices from government and/or collection agencies directed to various EB entities and begin preparation of spreadsheet relating to same (3.2).  Tax Issues
12/6/2021	KMP	3.10	Forward tax collection notices to accountant, prepare draft notice letters, and related communications with K. Duff and J. Wine (.9); continue review of emails and other materials relating to status of tax notices from government and/or collection agencies directed to various EB entities and begin preparation of spreadsheet relating to same (2.2).  Tax Issues
12/7/2021	KMP	1.30	Finalize notice letters to collection agencies and prepare transmittals relating to collection notices for past due 2017 taxes (.4); continue review of emails and other materials relating to status of tax notices from government and/or collection agencies directed to various EB entities and begin preparation of spreadsheet relating to same (.9).  Tax Issues
12/8/2021	KMP	0.20	Confer with J. Rak regarding property information for spreadsheets relating to sole lien and Group 1 properties (sole lien; Group 1).  Tax Issues
12/10/2021	KMP	0.90	Continue work on spreadsheet tracking tax notices and collection letters and status of responses to same.  Tax Issues
12/13/2021	KMP	3.40	Continue work on spreadsheet tracking tax notices and collection letters and status of responses to same.  Tax Issues
12/15/2021	KMP	3.40	Continue review of email communications and other materials to identify and track tax notices and others regarding tax filing and collection issues.  Tax Issues
12/20/2021	KMP	3.10	Continue review of email communications and other materials to identify and track tax notices and others regarding tax filing and collection issues.  Tax Issues

Date    Indiv   Hours   Description

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**12/21/2021 KMP**    0.40    Review notices received from tax authority and forward to accountant (.2);  
add details of notices to tracking spreadsheet for such tax-related  
communications (.2).

Tax Issues

SUBTOTAL:

\_\_\_\_\_    \_\_\_\_\_  
[21.90            3066.00]

137.80            \$31,964.00

Other ChargesDescriptionAsset Analysis & Recovery

Online research for December 2021	17.24
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SUBTOTAL:	[ 17.24]
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Asset Disposition

Fee for publication of notice of public sale (7109 Calumet)	550.00
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SUBTOTAL:	[ 550.00]
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Business Operations

Software license fees for December 2021 (Google Suite, \$96)	96.00
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Photocopies for December 2021	3.90
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SUBTOTAL:	[ 99.90]
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Total Other Charges	\$667.14
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Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Jodi Wine	38.10	260.00	\$9,906.00
Ania Watychowicz	23.60	140.00	\$3,304.00
Justyna Rak	11.20	140.00	\$1,568.00
Kathleen M. Pritchard	32.50	140.00	\$4,550.00
Andrew E. Porter	12.40	390.00	\$4,836.00
Michael Rachlis	20.00	390.00	\$7,800.00

**SUMMARY**

Legal Services	\$31,964.00
Other Charges	\$667.14
<b>TOTAL DUE</b>	<b>\$32,631.14</b>