

**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. Manish S. Shah

**OBJECTING INSTITUTIONAL LENDERS' OBJECTIONS TO RECEIVER'S 21ST  
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 1 (the "Objecting Institutional Lenders") object to the Receiver's 21st Interim Fee Application and Motion for Court Approval of Payment of Fees and Expenses of Receiver and Receiver's Retained Professionals (Dkt. 1538, the "21st Fee Petition" regarding the "Fees") on the same or similar bases contained in their prior objections, which objections this Court has denied.

The Objecting Institutional Lenders also object generally to the Receiver's request in his 21st Fee Petition for a super-priority lien for the same reasons contained in their Response to Motion for Approval to Pay Certain Previously Approved Fees and Cost (Dkt. 961), their Objections to Magistrate Judge Kim's Oral Ruling and Minute Order on Receiver's First Fee Allocation Motion (Dkt. 1389, objecting to Dkt. 1107, *see also* line-level objections at Dkt. 1210), and their Objections to Magistrate Judge Kim's Recommendation on Receiver's Second Motion for Approval of Fee Allocations for Interim Payment Pursuant to Receiver's Lien ("Objections to RF2A") (Dkt. 1501, objecting to Dkt. 1491 Recommendation and Dkt. 1321 Motion), all such

objections the Court has overruled except where the Receiver has agreed an error was made (*see, e.g.*, Dkt. 1450).

## **BACKGROUND**

1. The Objecting Institutional Lenders generally refer the Court to the Background section of their 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 (Dkt. 1250, pp. 2-6).

2. As additional background here, on November 9, 2023 the Receiver filed his 21st Fee Petition. Dkt. 1538.

3. Pursuant to the Court's Order, Dkt. 1031 at p.12, n.32, because the Objecting Institutional Lenders are reasserting prior allocation objections of the same category as they previously did, they do so below in "summary fashion that incorporates citations (with pinpoint cites) to previous filings that have laid out the objection."

### **I. The Objecting Institutional Lenders Assert The Same Objections To The Receiver's 21st Fee Petition As They Asserted To The Receiver's Prior Fee Applications.**

The Objecting Institutional Lenders adopt and assert their objections to the Receiver's prior fee petitions (Dkts. 1530, 1486, 1394, 1346, 1305, 1210, 1188, 1181, 1039, 1000, 960, 792, 777, 648, 617, 595, 581, 509, 438) as to the Receiver's 21st Fee Petition, to preserve those objections by incorporating them by reference into this response. The Objecting Institutional Lenders also adopt their objections stated in the January 4, 2023 submission on their behalf (email by Brett Natarelli to chambers, copying Receiver) noting the new availability of Estate funds in the operating account in sufficient amount to support most if not all of the Receiver's fee requests and the legal bases for why that would be more appropriate than a property surcharge against the segregated sales proceeds (which objections the Court rejected, but characterized as "narrow and

understandable,” Dkt. 1371). The Objecting Institutional Lenders also adopt the arguments presented in their Objections to Magistrate Judge Kim’s Oral Ruling and Minute Order on Receiver’s First Fee Allocation Motion, see Dkt. 1389, and their Objections to the RF2A (Dkt. 1501) and Objections to RF2A (Dkt. 1501, objecting to Dkt. 1491 Recommendation and Dkt. 1321 Motion).

The Estate’s general operating account has \$2,062,832.61 in available funds as of September 30, 2023 (Dkt. 1535 at p.30, PageID 105255), resulting from various distributions associated with prior fee orders. The Estate’s general operating account therefore has more than sufficient funding to bear the 21st Fee Petition amounts the Receiver seeks to allocate as a priming lien surcharge on the property sales proceeds totaling \$120,469.74. Dkt. 1538-1, Exh. I at p.8, PageID 105884. The District Court has repeatedly overruled objections arguing that the source of funds to pay the Receiver should, in substantial part, come from the operating account estate funds rather than the segregated property accounts. Dkts. 1371, 1366, 1452, Dkt. 1481 at 9 (“[T]hey argue that the allocated fees should be paid from the Receiver’s account and not from the property accounts. But this argument also simply retreads old ground. As the Objectors concede, this is a previously overruled objection.”)

## **II. Color-Coded Categorical Objections.**

The Receiver requests that \$120,469.74 of the Fees reflected on, among other exhibits, Exhibits F and G to Dkt. 1538, be paid as a first lien from the proceeds of the sales of the properties. The Receiver also attaches summaries and compilations of the same information provided with more detail in Exhibits F and G, and an allocation summary at Exhibit I, with more detail on the general and property-specific allocations at Exhibits J and K. Therefore, the line-item specific objections are presented only as to Exhibits F and G also apply to the proposed allocations. As before, the Objecting Institutional Lenders are not challenging the reasonableness of any time

spent, nor that the Receiver should be compensated, rather they argue and preserve for appeal their argument that the source of funds should be the estate's general operating account as to the subjects of the objections.

The Objecting Institutional Lenders have color highlighted sample entries on the Receiver and his attorneys' monthly invoices (Exhibits F and G to the 21st Fee Petition) to illustrate Fees that should not prime the victorious secured creditors' liens, a copy of which is attached as Exhibit 2. The bases of these specific objections are as follows:

*First*, Fees that the Objecting Institutional Lenders contend should be paid from estate operating funds rather than segregated property sale proceeds, but which objections the Court has previously overruled and where the issues are substantially the same as previously overruled objections, are highlighted in **RED**. These include:

- Fees marked “defer” which typically relate to the Receiver’s pursuit of EquityBuild assets against third parties. These are marked red to preserve the objection for appeal if and when the Receiver purports to allocate them to a property. (In this quarter’s iteration, there were several “defer” charges which appear to be properly attributable to a specific property which is yet unknown; the Objecting Institutional Lenders do not offer objections to these entries).
- Entries which are unreasonably vague, such as “communicate with J. Wine regarding future groups” billed to all 68 remaining properties including Group 2 (8/30/23, Dkt. 1538-1, Exh. G, PageID 105851).
- The Court has overruled objections similar to those above in all prior fee petitions and associated objections. *See, e.g.*, Dkt. 1353 at pp.8-9 (and citations therein); Dkt. 1181 at pp. 9-14; Dkt. 1504, Dkt. 1536.

*Second*, Fees incurred to general review of claims without any apparent tie-in to adjudication efforts or even to activities presently occurring in the case should be charged to the estate's operating account because no benefit to the victorious secured creditor can be shown at this time. Such entries are highlighted in **YELLOW**. Such entries are fairly voluminous, often vague, and are generally associated with properties for which the adjudication process has not even started. As example, see Dkt. 1538-1, Exh. G, PageID 105842, 8/9/2023 entry for 3.9 hours, "Continue working on claims, review claims submissions for properties" to be billed to 1700 Juneway, a Group 2 property, 4611 Drexel, a Group 5 property, and two other properties in later groups. The Objecting Institutional Lenders incorporate by reference their detailed descriptions of this objection category at Dkt. 1443 pp. 10-11; Dkt. 1389 (legal argument at pp. 1-8, specifics on this category at pp. 10-11); and Dkt. 1210 at p.14. The Court overruled these objections and broadened the "implementation and management of an orderly summary claim-priority adjudication process" priming lien category (Dkt. 1030 at p.2) to include "giving notice to interested parties, locating and preserving records, and handling creditor inquiries" and general claim review in preparation for adjudication (Dkt. 1366 at 2) in granting the Receiver's 17<sup>th</sup> Fee Petition. The Court also overruled this objection category when granting the First Fee Allocation Motion (Dkt. 1450) and has overruled all similar objections the Institutional Lenders have made since including as to the 19<sup>th</sup> and 20<sup>th</sup> Fee Petitions. *See, e.g.*, Dkts. 1504, 1536.

*Third*, Fees incurred to litigate Group 1 claims are not payable at this time through a priming lien. The Court had ruled earlier in the case 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 which is on appeal and thus ongoing. (Dkt. 1030, p. 14, n.7.). Such entries

are highlighted in **ORANGE**. The Court has repeatedly overruled objections on this basis. *See, e.g.*, Dkts. 1504, 1536.

*Fourth*, the Objecting Institutional Lenders object to Fees associated with tasks the Receiver would have needed to undertake even in the absence of issues of secured priority such as preparing status reports, effectuating service, or performing accounting functions. While the Objecting Institutional Lenders do not dispute that the Receiver should be paid for this work unless otherwise objected to on another ground (such as the FHFA issues), paying fees for such tasks out of segregated sales proceeds to the detriment of the victorious secured creditor violates the general rule that the estate's operating account should bear the expense absent special benefit to the victorious secured creditor. *See* Dkt. 1389, pp. 3-8, and cases cited therein. These entries are highlighted in **BLUE**. As example, see 7/11/2023 entry for 1.6 hours to "Further prepare for and participate in hearing" billed to all 68 remaining properties, even though almost nothing was discussed about later group properties at that hearing. Dkt. 1538-1, Exh. G, PageID 105821. The Court has previously overruled all such "general receivership" objections. *See* Dkt. 1481, Exh. A (Transcript of 4/26/2023 hearing at pp. 22-23); Dkt. 1481 at pp. 12-13 (Receiver summary of Court's prior ruling on similar issues but involving different fee entries). The Court also overruled similar objections made in the 17th - 20th Fee Petitions (Dkts. 1366, 1452, 1504, 1536).

*Fifth*, the Objecting Institutional Lenders object to Fees related to Group 2 as premature because it is too early to determine if the Receiver will have conferred a benefit on the properties sufficient to obtain a priming lien until after the adjudication process plays out. These entries are highlighted in **GREEN**. For example, the Receiver attributed 5.6 hours on 7/28/2023 to 1700 Juneway for "complete review of discovery responses, detailed notes regarding same, and extensive update to claimants' contact information." Dkt. 1538-1, Exh. G, PageID 105828. Yet

the Receiver chose not to assert any avoidance claim on that property and the Institutional Lender recorded two months prior to the individuals, so it is at this time unlikely that the Receiver's "extensive update to claimants' contact information" will be of benefit to the victorious secured creditor, whether that be Thorofare (no benefit) or the individuals (who will be eager to be contacted to receive funds). The Court has rejected similar arguments about Group 1 Fees generally. *See, e.g.*, Dkts. 1350, 1353 at pp.9- 10 (and citations therein), 1366, 1371. The Objecting Institutional Lenders also argued for deferring allocation of Group 2 fees until after the completion of Group 2 adjudication in their objections to the 19<sup>th</sup> Fee Petition (Dkt. 1486 at p.7) and 20<sup>th</sup> Fee Petition (Dkt. 1530 at p.9); the Court declined to defer such fees until after adjudication, awarded them to the Receiver and overruled the Objecting Institutional Lender's Group 2 deferment objections in this regard (Dkt. 1504, 1536).

**III. The 21st Fee Application Should Be Subject To A 20% Holdback on all Fees and an Additional 20% Holdback on All Fees to be Surcharged to the Secured Properties.**

Consistent with the Court's order approving the Receiver's ninth, tenth, and eleventh fee petitions (Dkt. 1031, pp. 13-14), twelfth fee petition, (Dkt. 1213, p. 9), and fee petitions thirteen through sixteen (Dkt. 1312, pp. 3-4), and the reasons advanced in the Motion for Reconsideration, Dkt. 1471, which the Court denied, the Objecting Institutional Lenders respectfully request that the Court require any approved fees be subject to "a holdback of 20% of the fees (but not expenses)<sup>1</sup> requested in the applications, and an additional 20% holdback on any fees to be paid

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<sup>1</sup> Under a 20% holdback on all fees, as the Court has repeatedly imposed, the 20% holdback will amount to \$32,512.702 (Dkt. 1538, pp. 10-11,  $\$21,957 + \$140,606.51 = \$162,563.51$ , multiplied by 20% is \$32,512.70). If the Court were to impose the additional 20% holdback on fees to be surcharged to properties as requested by the Objecting Institutional Lenders, but which the Court has recently rejected, an additional amount of \$24,093.95 would be held back ( $\$120,469.74$  to be allocated to properties per Dkt. 1538-1, Exh. I, PageID 105884, multiplied by 20% equals \$24,093.95).

from the sales proceeds of encumbered real estate” as the Court previously held prior to the 17<sup>th</sup> Fee Petition. Dkt. 1312, p.4 (Order on Petitions 13-16). The Court has since then rejected any additional holdback on property-specific accounts in favor of a 20% holdback on all fees only. Dkts. 1483, 1504, 1510, 1511, 1536. While the Court has required only a 20% holdback since the 17<sup>th</sup> Petition, see Dkt. 1468, the Objecting Institutional Lenders continue to assert that an additional holdback of 20% of Fees to be allocated against the properties’ segregated sales proceeds will ensure there are sufficient untapped funds to unwind any errors. Such errors might include Objecting Institutional Lenders objections to fee petitions being sustained on final appeal at the conclusion of the Receivership. The Objecting Institutional Lenders also made this argument in the 19<sup>th</sup> Fee Petition (Dkt. 1486 at p.8), and 20<sup>th</sup> Fee Petition (Dkt. 1530 at p.10) and the Court rejected the argument in favor of a sole 20% holdback on all Fees (Dkt. 1504, 1536).

### CONCLUSION

Consequently, the Objecting Institutional Lenders request that the Court deny the Receivers 21st Fee Application on the grounds raised herein and in their objections to the Receiver’s prior fee applications. If the Fees are approved, the Objecting Institutional Lenders argue that the objected-to Fees should be paid from the estate’s operating funds rather than the segregated property sales proceeds. The Objecting Institutional Lenders reiterate their previously rejected request that any payment of approved fees from property-specific accounts be subject to an additional 20% holdback, in addition to the 20% holdback on all fees the Court has recently imposed.

Dated: December 8, 2023

Respectfully submitted,

<u>/s/ Brett J. Ntarelli</u> Edward S. Weil (eweil@dykema.com)	<u>/s/ Ronald A. Damashek</u> Ronald Damashek (rdamashek@dickinsonwright.com) Dickinson Wright PLLC
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<p>Todd Gale (tgale@dykema.com) Brett J. Natarelli (bnatarelli@dykema.com) Kevin Connor (kconnor@dykema.com) Dykema Gossett PLLC 10 S. Wacker Drive, Suite 2300 Chicago, Illinois 60606 (312) 627-5675 <i>Counsel for Federal Home Loan Mortgage Corporation 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 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;</i></p>	<p>55 West Monroe Street — Suite 1200 Chicago, Illinois 60603 Ph: (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 Liberty EBCP, LLC</i></p> <p><u>s/ Andrew T. McClain</u> Jill L. Nicholson (jnicholson@foley.com) 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</i></p>
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<p><i>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><i>Certificates, Series 2014-LC16; Federal National Mortgage Association; and Sabal TL1, LLC</i></p> <p><u>/s/ Timothy J. Patenode</u>          Timothy J. Patenode          (timothy.patenode@katten.com)          Katten Muchin Rosenman LLP          525 W. Monroe Street          Chicago, IL 60661-3693          Ph: (312) 902-5200          Fax: (312) 902-1061  <i>Counsel for UBS AG</i></p>
<p><u>s/Jay L. Welford</u>          Jay L. Welford          Counsel to Liberty EBCP, LLC  <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> <p><u>s/ Mark S. Landman</u>  <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> <p><u>/s/ Thomas B. Fullerton</u>          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> <p><u>/s/ Michael D. Napoli</u>          Michael D. Napoli (TX 14803400)          Akerman LLP</p>	<p><u>s/ William J. Serritella, Jr.</u>          William J. Serritella, Jr.  <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>

<p>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><i>/s/ Bradley S. Anderson</i> Bradley S. Anderson, MO #53569 1201 Walnut Street, Ste. 2900 Kansas City, MO 64106-2150 Telephone: (816) 691-3119 Facsimile: (816) 412-1000 bradley.anderson@stinson.com <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>
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 8, 2023, I electronically filed with CM/ECF the foregoing **OBJECTING INSTITUTIONAL LENDERS RESPONSE TO RECEIVER'S 21st INTERIM APPLICATION AND MOTION FOR COURT APPROVAL OF PAYMENT OF FEES AND EXPENSES OF RECEIVER AND RECEIVER'S RETAINED PROFESSIONALS** which sent electronic notification of the filing to all attorneys of record

*/s/ Candace Mandel*

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# Exhibit 1

**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-SBS0; 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-C 1, 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 EIT Fund IV, LLC; and Liberty EBCP, LLC.; 1111 Crest Dr., LLC, Pakravan Living Trust, Hamid Esmail, and Farsaa, Inc. ; Sabal TL1, LLC.

# Exhibit F

# Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
SUITE 900  
CHICAGO, ILLINOIS 60605

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

October 13, 2023

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. 6621161

Legal Fees for July 2023	\$7,215.00
Expenses Disbursed	<u>\$0.00</u>
<b>Due this Invoice</b>	<b>\$7,215.00</b>



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Asset Analysis &amp; Recovery</u>			
7/25/2023	KBD	0.1	Exchange correspondence with A. Watychowicz regarding potential victim restitution related to separate criminal prosecution action.  Asset Analysis & Recovery
SUBTOTAL:			[ 0.1 39.00 ]
<u>Case Administration</u>			
7/1/2023	KBD	0.1	Exchange correspondence with J. Wine regarding hearing before Judge Shah (set68).  Case Administration
7/2/2023	KBD	0.1	Further confer with J. Wine regarding hearing before Judge Shah (set68).  Case Administration
7/3/2023	KBD	0.1	Exchange correspondence with J. Wine Regarding items to be addressed in database improvements.  Case Administration
7/7/2023	KBD	1.4	Research regarding banking and fund options (.4); telephone conference with tax administrator and tax counsel regarding funds management issues (.3); telephone conference with bank representative regarding accounts and interest rate (.4); telephone conference with J. Wine regarding claims database issues (.2); study correspondence from A. Watychowicz regarding receivership funds (.1).  Case Administration
7/10/2023	KBD	1	Attention to communication from claimant regarding funds held by receivership estate and related telephone conference with A. Watychowicz (.2); confer with claims database vendor representative , J. Wine, and J. Rak regarding database development, reporting, and improvements (.4); further confer with J. Wine regarding claims database issues (.2); confer with K. Pritchard regarding communication with bank representative regarding receivership status (.1); exchange correspondence with A. Watychowicz regarding website update (.1).  Case Administration
7/11/2023	KBD	0.3	Study correspondence from bank representative regarding account terms and research same.  Case Administration
7/14/2023	KBD	0.2	Exchange correspondence with bank representative regarding account terms .  Case Administration
7/19/2023	KBD	0.7	Exchange correspondence regarding account interest issues (.3); draft additional correspondence regarding account interest issue (.4).  Case Administration

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
7/21/2023	KBD	0.1	Exchange correspondence regarding account interest issue. Case Administration

SUBTOTAL: [ 4 1,560.00 ]

Claims Administration & Objections

7/4/2023	KBD	0.3	Exchange correspondence with A. Watychowicz and J. Wine regarding draft response to claimant inquiry (3030 E 79th, 7301 Stewart, 7500 Eggleston). Claims Administration & Objections
7/5/2023	KBD	0.2	Further exchange correspondence with J. Wine regarding claimant inquiry (3030 E 79th, 7301 Stewart, 7500 Eggleston). Claims Administration & Objections
7/6/2023	KBD	0.5	Telephone conference with K. Duff and M. Rachlis regarding pending motions, priority actions, and claims review status (set68) (.4); attention to communication with claimant regarding motion for stay of distributions and appeal (Group 1) (.1). Claims Administration & Objections
7/7/2023	KBD	1.2	Telephone conference with J. Wine regarding analysis of claims and efforts to resolve all claims (1131 E 79th, 7024 Paxton) (.8); attention to correspondence regarding claimants' inquiries and draft responses (1131 E 79th, 4520 Drexel, 7024 Paxton, 7546 Saginaw) (.2); confer with A. Watychowicz regarding claims related documents and communicate with counsel regarding requested documents (6160 MLK) (.2). Claims Administration & Objections
7/9/2023	KBD	1.3	Telephone conference with M. Rachlis and J. Wine regarding analysis of claims, efforts to resolve all claims, and communications with claimant's counsel (1131 E 79th, 7024 Paxton) (.9); confer with J. Wine regarding discovery issue (Group 2) (.1); study correspondence from J. Wine regarding claims documentation analysis (Group 2) (.3). Claims Administration & Objections
7/10/2023	KBD	0.5	Exchange correspondence with A. Watychowicz regarding communication from unsecured claimant (defer) (.1); work on responses to claimants' inquiries (3030 E 79th, 4351 Calumet, 4611 Drexel, 6160 MLK, 7301 Stewart, 7500 Eggleston, 9531 Fairfield) (.1); exchange correspondence with J. Wine and M. Rachlis regarding claims discovery (Group 2) (.2); exchange correspondence with J. Wine regarding claimant inquiry (Group 2) (.1). Claims Administration & Objections

Date	Indiv	Hours	Description
7/11/2023	KBD	2.4	Prepare for hearing with M. Rachlis and J. Wine (set68) (.8); appear for hearing before Judge Shah (.6) (set68); conference with Judge Shah and counsel for claimant (1131 E 79th, 7024 Paxton) (.4); confer with M. Rachlis and J. Wine regarding potential resolution of claims (1131 E 79th, 7024 Paxton) (.3); confer with J. Wine and A. Watychowicz regarding communications to claimants (Group 1) (.1); exchange correspondence regarding communication with claimant relating to hearing (set68) (.1); study correspondence from J. Wine regarding communication with claimants' class counsel (defer) (.1).
			Claims Administration & Objections
7/12/2023	KBD	0.4	Confer with A. Watychowicz and J. Wine regarding communications with claimant (7508 Essex, 7927 Essex, 8100 Essex, 8201 Kingston) (.2); exchange correspondence with A. Watychowicz regarding communication with claimants regarding court order regarding stay of distributions (Group 1) (.2).
			Claims Administration & Objections
7/13/2023	KBD	1.9	Attention to communication with unsecured claimant (defer) (.1); exchange correspondence with J. Wine regarding Group 2 discovery (.1); attention to evaluation of properties and related considerations and exchange related correspondence with M. Rachlis and J. Wine (1131 E 79th, 7024 Paxton) (1.4); study analysis of claims and exchange related correspondence with J. Wine (1700 Juneway, 6949 Merrill) (.3).
			Claims Administration & Objections
7/14/2023	KBD	1.1	Telephone conference with and draft related correspondence to M. Rachlis and J. Wine regarding potential resolution of claims (1131 E 79th, 7024 Paxton) (.9); exchange correspondence with J. Wine regarding claimant (1700 Juneway, 4317 Michigan, 5001 Drexel, 5955 Sacramento, 6356 California, 6949 Merrill, 7026 Cornell, 7625 East End, 7953 Marquette) (.2).
			Claims Administration & Objections
7/17/2023	KBD	0.8	Work on Group 3 status report and exchange related correspondence with J. Wine (Group 3) (.4); attention to requests for production (5450 Indiana, 7749 Yates) (.4).
			Claims Administration & Objections
7/20/2023	KBD	0.2	Confer with J. Wine regarding appeal (Group 2).
			Claims Administration & Objections
7/21/2023	KBD	0.8	Exchange correspondence with J. Wine regarding requests for production (5450 Indiana, 7749 Yates) (.2); review Group 3 status report and exchange related correspondence (Group 3) (.4); attention to claimant communication regarding Group 3 procedure and exchange related correspondence with A. Watychowicz (Group 3) (.2).
			Claims Administration & Objections

SUBTOTAL:

[ 11.6      4,524.00 ]

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Status Reports</u>			
7/10/2023	KBD	0.1	Confer with J. Wine regarding status report planning. Status Reports
7/18/2023	KBD	0.8	Study and revise draft status report. Status Reports
7/19/2023	KBD	0.4	Study revised status report and exchange related correspondence. Status Reports
7/20/2023	KBD	0.4	Confer with J. Wine regarding preparation of status report and timing (.1); study revised status report and related correspondence (.3). Status Reports
7/21/2023	KBD	0.4	Review draft status report and related communications. Status Reports
7/23/2023	KBD	0.1	Attention to correspondence regarding draft status report. Status Reports
7/27/2023	KBD	0.2	Review revised status report and exchange related correspondence with J. Wine. Status Reports
7/28/2023	KBD	0.2	Review revised status report and correspondence from A. Watychowicz. Status Reports
7/30/2023	KBD	0.2	Review revised status report and exchange related correspondence with A. Watychowicz. Status Reports
SUBTOTAL:			[ 2.8      1,092.00 ]
			18.5      \$7,215.00

Summary of Activity

	<u>Hours</u>	<u>Rate</u>	
Duff, Kevin B.	18.50	390.00	\$7,215.00

**SUMMARY**

Legal Services	\$7,215.00
Other Charges	\$0.00
<b>TOTAL DUE</b>	<b>\$7,215.00</b>

## Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
SUITE 900  
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TEL (312) 733-3950  
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October 13, 2023

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. 6621162

Legal Fees for August 2023	\$10,452.00
Expenses Disbursed	<u>\$0.00</u>
<b>Due this Invoice</b>	<b>\$10,452.00</b>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
<u>Asset Analysis &amp; Recovery</u>					
8/7/2023	KBD	0.4	Exchange correspondence with M. Rachlis and A. Porter regarding potential claim and related analysis. Asset Analysis & Recovery		
8/21/2023	KBD	0.3	Study communication regarding potential recovery and exchange related correspondence with A. Watychowicz. Asset Analysis & Recovery		
SUBTOTAL:				[ 0.7	273.00 ]
<u>Business Operations</u>					
8/4/2023	KBD	0.1	Attention to recovery of tax refund and exchange related correspondence (7109 Calumet). Business Operations		
8/16/2023	KBD	0.2	Exchange correspondence with K. Pritchard regarding insurance premium refund (4520 Drexel, 4611 Drexel, 7109 Calumet, 7255 Euclid, 8201 Kingston). Business Operations		
8/17/2023	KBD	0.2	Exchange correspondence with J. Wine and K. Pritchard regarding insurance premium refund and allocation among benefited properties (4520 Drexel, 4611 Drexel, 7109 Calumet, 7255 Euclid, 8201 Kingston). Business Operations		
8/18/2023	KBD	0.1	Exchange correspondence with K. Pritchard and J. Wine regarding insurance premium refund and transfer of funds to benefited properties (4520 Drexel, 4611 Drexel, 7109 Calumet, 7255 Euclid, 8201 Kingston). Business Operations		
SUBTOTAL:				[ 0.6	234.00 ]
<u>Case Administration</u>					
8/30/2023	KBD	0.1	Exchange correspondence with J. Wine and A. Watychowicz regarding communication with claimant regarding receivership funds. Case Administration		
SUBTOTAL:				[ 0.1	39.00 ]
<u>Claims Administration &amp; Objections</u>					
8/2/2023	KBD	0.1	Exchange correspondence with J. Wine regarding issue relating to third party action (defer).		

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
8/3/2023	KBD	0.3	Exchange correspondence with J. Wine and A. Watychowicz regarding response to claimant regarding appeal and related costs (Group 1) (.1); exchange correspondence with J. Wine regarding response to appeal (Group 1) (.2).
			Claims Administration & Objections
8/4/2023	KBD	5.3	Study and revise draft appellate brief (Group 1) (4.8); telephone conferences with J. Wine regarding draft appellate brief (Group 1) (.3); exchange correspondence with J. Wine regarding appeal issues and related communications (Group 1) (.2).
			Claims Administration & Objections
8/5/2023	KBD	1.2	Study and revise draft appellate brief (Group 1).
			Claims Administration & Objections
8/6/2023	KBD	2.1	Revise draft appellate brief, research the record, and conduct legal research regarding various related issues (Group 1).
			Claims Administration & Objections
8/7/2023	KBD	2.3	Draft and revise appellate brief, research the record, and exchange related correspondence (Group 1) (2.0); confer and exchange correspondence with J. Wine regarding claims analysis issue (defer) (.2); confer with J. Wine regarding Group 1 appeal (Group 1) (.1).
			Claims Administration & Objections
8/9/2023	KBD	2.6	Exchange correspondence with M. Rachlis and J. Wine regarding appellate brief (Group 1) (.1); study and revise appellate brief and exchange related correspondence with M. Rachlis and J. Wine (Group 1) (2.5).
			Claims Administration & Objections
8/10/2023	KBD	2.7	Study revised versions of appellate brief, revise brief, and exchange related correspondence with M. Rachlis, J. Wine, and A. Watychowicz (Group 1).
			Claims Administration & Objections
8/11/2023	KBD	3.7	Study and revise appellate brief and exchange related correspondence with M. Rachlis, J. Wine, and A. Watychowicz (Group 1).
			Claims Administration & Objections
8/14/2023	KBD	0.5	Exchange correspondence with K. Pritchard and J. Wine regarding service of subpoena and research relating to same (5450 Indiana, 7749 Yates) (.2); exchange correspondence with A. Watychowicz and J. Wine regarding claimant claims and related issues (8100 Essex, Group 3) (.2); exchange correspondence with J. Wine regarding potential issue relating to claims (defer) (.1).
			Claims Administration & Objections
8/15/2023	KBD	0.4	Study claimants' appellate response brief (Group 1).
			Claims Administration & Objections



Date	Indiv	Hours	Description
8/18/2023	KBD	0.2	Telephone conference with J. Wine regarding claims analysis (set68) (.1); exchange correspondence with M. Rachlis and J. Wine regarding communications relating to potential resolution of claims (1131 E 79th, 7024 Paxton) (.1). Claims Administration & Objections
8/21/2023	KBD	1.6	Telephone conference with M. Rachlis and J. Wine regarding communication with claimant's counsel regarding potential resolution of claims (1131 E 79th, 7024 Paxton) (1.1); draft correspondence to M. Rachlis and J. Wine regarding issues relating to claim (1131 E 79th, 7024 Paxton) (.3); review claimant's motion to certify issue for appeal (1131 E 79th, 7024 Paxton) (.2). Claims Administration & Objections
8/22/2023	KBD	0.8	Exchange correspondence with J. Wine and M. Rachlis regarding discovery related issues (1700 Juneway, 6949 Merrill) (.2); review notice of appeal (1131 E 79th, 7024 Paxton) (.1); review motion for certification of issue for appeal and related correspondence from A. Watychowicz (1131 E 79th, 7024 Paxton) (.3) attention to communications with M. Rachlis and J. Wine regarding potential resolution of claims (1131 E 79th, 7024 Paxton) (.1); study correspondence from J. Wine regarding claims analysis (set68) (.1). Claims Administration & Objections
8/28/2023	KBD	0.3	Exchange correspondence with J. Wine and A. Watychowicz regarding communication with claimant relating to claims against properties (6160 MLK, 7953 Marquette) (.2); exchange correspondence with J. Wine regarding distribution in investor class action (defer) (.1). Claims Administration & Objections
8/29/2023	KBD	0.6	Exchange correspondence with A. Watychowicz regarding communication with claimants (Group 3) (.2); exchange correspondence with J. Wine and A. Watychowicz regarding communication with claimant regarding issues relating to claims (Group 3) (.2); study draft jurisdictional statement and exchange related correspondence with M. Rachlis and J. Wine (Group 1) (.2). Claims Administration & Objections
8/30/2023	KBD	0.3	Exchange correspondence with J. Wine and A. Watychowicz regarding communication with claimant regarding participation in hearing (Group 3) (.2); attention to jurisdictional statement (Group 1) (.1). Claims Administration & Objections
8/31/2023	KBD	0.2	Telephone conference with A. Watychowicz regarding communication with claimant (Group 3) (.1); study correspondence from J. Wine regarding issues relating to claimant and claim (4533 Calumet, 7508 Essex) (.1). Claims Administration & Objections

SUBTOTAL:

[ 25.2 9,828.00 ]

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
<u>Distributions</u>					
8/4/2023	KBD	0.2	Attention to distribution planning and logistics (Group 3). Distributions		
SUBTOTAL:				[ 0.2	78.00 ]
				26.8	\$10,452.00

<u>Summary of Activity</u>			
	<u>Hours</u>	<u>Rate</u>	
Duff, Kevin B.	26.80	390.00	\$10,452.00

**SUMMARY**

Legal Services	\$10,452.00
Other Charges	\$0.00
<b>TOTAL DUE</b>	<b>\$10,452.00</b>

## Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
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October 17, 2023

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. 6621163

Legal Fees for September 2023	\$4,290.00
Expenses Disbursed	<u>\$0.00</u>
<b>Due this Invoice</b>	<b>\$4,290.00</b>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Asset Analysis &amp; Recovery</u>			
9/15/2023	KBD	0.6	Exchange correspondence with A. Porter and M. Rachlis regarding potential claim (.4); confer with M. Rachlis regarding potential claim (.2).
			Asset Analysis & Recovery
SUBTOTAL:			[ 0.6      234.00 ]

<u>Case Administration</u>			
9/14/2023	KBD	0.4	Confer with claims vendor and J. Wine regarding claims database issues, development, and reports.
			Case Administration
SUBTOTAL:			[ 0.4      156.00 ]

<u>Claims Administration &amp; Objections</u>			
9/1/2023	KBD	0.3	Telephone conference with J. Wine regarding claims analysis, data sources, third-party information , and related issues (set 68).
			Claims Administration & Objections
9/5/2023	KBD	0.1	Exchange correspondence with J. Wine regarding order granting motion to stay appeal (1131 E 79th, 7024 Paxton).
			Claims Administration & Objections
9/6/2023	KBD	0.3	Study motion to certify and related pleadings and exchange related correspondence with M. Rachlis and J. Wine (1131 E 79th, 7024 Paxton).
			Claims Administration & Objections
9/7/2023	KBD	0.2	Exchange correspondence with A. Watychowicz regarding communication from claimant regarding claims process relating to properties (7237 Bennett, 7255 Euclid, 8100 Essex).
			Claims Administration & Objections
9/11/2023	KBD	2.4	Confer with J. Wine and M. Rachlis regarding preparation for hearing before Judge Shah and Group 2 claims process issues (Group 2) (1.3); confer J. Wine and M. Rachlis regarding overall claims process, schedule, and planning (set68) (.4); attention to communication with claimant and related correspondence from A. Watychowicz and J. Wine (7237 Bennett, 7255 Euclid, 8100 Essex) (.1); exchange correspondence with A. Watychowicz regarding communication with claimant regarding claims and process (1131 E 79th, 4533 Calumet, SSDF4) (.2); exchange correspondence with J. Wine and M. Rachlis regarding claims review, schedule, and planning for future groups (Group 4, Group 5) (.4).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
9/12/2023	KBD	1.5	Appear for hearing before Judge Shah regarding claims process status and planning (set73) (1.2); confer with counsel regarding discovery issues (5450 Indiana, 7749 Yates) (.2); confer with M. Rachlis and J. Wine regarding claims review issues (1700 Juneway, 6949 Merrill) (.1).
			Claims Administration & Objections
9/13/2023	KBD	0.1	Exchange correspondence with J. Wine regarding claimant document production issues (5450 Indiana, 7749 Yates).
			Claims Administration & Objections
9/15/2023	KBD	1.5	Prepare for meeting on Group 2 claims (Group 2) (.4); confer with M. Rachlis and J. Wine regarding analysis of claims against Group 2 properties (Group 2) (.5); confer with SEC, M. Rachlis, and J. Wine regarding Group 2 claims analysis (Group 2) (.6).
			Claims Administration & Objections
9/18/2023	KBD	0.1	Study correspondence from J. Wine regarding communications regarding claims analysis issues (Group 2).
			Claims Administration & Objections
9/19/2023	KBD	0.2	Study correspondence from J. Wine regarding claims discovery issues (5450 Indiana, 7749 Yates).
			Claims Administration & Objections
9/20/2023	KBD	0.7	Confer with counsel regarding discovery issues and planning (5450 Indiana, 7749 Yates) (.1); exchange correspondence with A. Watychowicz, M. Rachlis, and J. Wine regarding claimant communications improvements (set68) (.1); exchange correspondence with J. Wine and M. Rachlis regarding issues relating to claimant and related communications, and study related records (6949 Merrill) (.4); exchange correspondence with S. Zjalic regarding issues relating to claimant (6949 Merrill) (.1).
			Claims Administration & Objections
9/21/2023	KBD	0.7	Study draft response to status report and exchange related correspondence with M. Rachlis and J. Wine (1131 E 79th, 7024 Paxton) (.5); exchange correspondence regarding deposition planning (5450 Indiana, 7749 Yates) (.1); exchange correspondence with K. Pritchard regarding records relating to claimant (6949 Merrill) (.1).
			Claims Administration & Objections
9/22/2023	KBD	0.1	Review correspondence to potential claimant regarding notice of receivership and claims process (defer).
			Claims Administration & Objections
9/25/2023	KBD	0.7	Telephone conference and exchange correspondence with J. Wine regarding research regarding claimant and claims related issues (6949 Merrill) (.4); telephone conference with and study correspondence from J. Wine regarding discovery related to claim (5450 Indiana, 7749 Yates) (.3).
			Claims Administration & Objections

Date	Indiv	Hours	Description
9/27/2023	KBD	0.3	Exchange correspondence with A. Watychowicz regarding response to claimant regarding claims process and timing (7749 Yates) (.1); exchange correspondence with J. Wine regarding discovery relating to claim (5450 Indiana, 7749 Yates) (.1); exchange correspondence with M. Rachlis, J. Wine, and A. Watychowicz regarding order relating to appeal and stay of briefing (1131 E 79th, 7024 Paxton) (.1).

Claims Administration & Objections

9/29/2023	KBD	0.1	Exchange correspondence with J. Wine regarding updating claims records (4533 Calumet). Claims Administration & Objections
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SUBTOTAL: [ 9.3      3,627.00 ]

Distributions

9/11/2023	KBD	0.2	Confer with J. Wine and M. Rachlis regarding Group 3 distribution and schedule issues (Group 3). Distributions
9/12/2023	KBD	0.1	Exchange correspondence with A. Watychowicz regarding communication with claimant regarding timing for distribution (Group 3). Distributions
9/29/2023	KBD	0.2	Exchange correspondence with J. Wine regarding potential update to distribution spreadsheet (3030 E 79th, 7301 Stewart, 7500 Eggleston). Distributions

SUBTOTAL: [ 0.5      195.00 ]

Status Reports

9/5/2023	KBD	0.2	Telephone conference on status with SEC . Status Reports
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SUBTOTAL: [ 0.2      78.00 ]

11      \$4,290.00

Summary of Activity

	Hours	Rate	
Duff, Kevin B.	11.00	390.00	\$4,290.00

**SUMMARY**

Legal Services	\$4,290.00
Other Charges	\$0.00
<b>TOTAL DUE</b>	<b>\$4,290.00</b>



# Exhibit G

## Rachlis Duff & Peel, LLC

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CHICAGO, ILLINOIS 60605

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FAX (312) 733-3952

October 13, 2023

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. 6622161

Legal Fees for July 2023	\$42,543.00
Expenses Disbursed	<u>\$144.00</u>
<b>Due this Invoice</b>	<b>\$42,687.00</b>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Accounting/Auditing</u>			
7/14/2023	KMP	0.4	Prepare deposit documentation and transmittal to bank for deposit of refund checks from financial institution . Accounting/Auditing
7/19/2023	KMP	0.1	Attention to communications with bank representative regarding changes to interest rates for Receiver's accounts. Accounting/Auditing
7/26/2023	KMP	0.4	Work on updating ledger for receiver's accounts to account for recent transactions. Accounting/Auditing
SUBTOTAL:			[ 0.9      126.00 ]
<u>Asset Analysis &amp; Recovery</u>			
7/25/2023	AW	0.1	Attention to entered judgment and related communication with K. Duff (defer). Asset Analysis & Recovery
SUBTOTAL:			[ 0.1      14.00 ]
<u>Business Operations</u>			
7/10/2023	JR	0.8	Review refund checks related to property taxes, determined they should be applied to estate assets, communication with A. Porter regarding same, prepare correspondence to current owner (7109 Calumet) (.3); review additional refund checks related to property taxes, determined they should be sent to current owners of properties, communicate with A. Porter regarding same, and prepare correspondence to current owners (6807 Indiana, 8326 Ellis) (.5). Business Operations
7/18/2023	AW	0.1	Communicate with counsel regarding former EB employee (defer). Business Operations
7/25/2023	AW	0.1	Communicate with property manager regarding check (6217 Dorchester). Business Operations
SUBTOTAL:			[ 1      140.00 ]
<u>Case Administration</u>			
7/3/2023	AW	0.2	Update service lists to remove former counsel (.1); communicate with J. Wine regarding filed motions and proposed message to claimants (.1).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Case Administration
7/3/2023	JRW	0.2	Study list of outstanding items from claims vendor and related summary and recommendations to team.
			Case Administration
7/5/2023	AW	0.4	Email claimants regarding motions filed with the Court and entered order (.3); attention to order re-setting hearing to July 11, 2023 and email claimants regarding same (.1).
			Case Administration
7/7/2023	AW	0.5	Request update to Receivership web page.
			Case Administration
7/7/2023	JRW	0.2	Telephone conference with K. Duff regarding database issues.
			Case Administration
7/10/2023	AW	0.1	Attention to served discovery responses to institutional lenders and third-parties and update docket.
			Case Administration
7/10/2023	JRW	1.2	Confer with A. Watychowicz regarding updating records in claims portal (.1); prepare for and attend conference with claims vendor regarding updates to claims portal (.6); generate test reports from portal (.2); exchange correspondence with claims vendor regarding pending actions regarding claims portal and related discussion with K. Duff (.3).
			Case Administration
7/10/2023	KMP	0.2	Communicate with bank representative regarding status of litigation, and related follow up with K. Duff.
			Case Administration
7/11/2023	AW	1.2	Attend court hearing by telephone in order to be informed and responsive to claimant inquiries (.7); request revisions to Receivership web page (.1); attention to entered order providing dial-in info to scheduled hearing and arrange for timely delivery to all claimants (.4).
			Case Administration
7/11/2023	JRW	1	Telephone conference with claims vendor regarding exporting reports from claims portal and importing data from spreadsheets (.7); related exchange of correspondence with claims vendor regarding recap of discussions and with J. Rak regarding fact research and cleanup of spreadsheets (.3).
			Case Administration
7/11/2023	KMP	0.3	Attention to receipt and payment of document database vendor invoices.
			Case Administration
7/12/2023	JRW	0.4	Exchange correspondence with claims vendor regarding importing of claims review spreadsheets.
			Case Administration
7/14/2023	JRW	0.1	Work with A. Watychowicz and claimants' counsel regarding upload of records requested.

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Case Administration
7/17/2023	JRW	0.2	Work on formatting report and related correspondence to claims vendor .
			Case Administration
7/18/2023	JRW	0.1	Correspondence to class counsel regarding updated contact information for claimants.
			Case Administration
7/18/2023	SZ	0.2	Email exchange with A. Watychowicz regarding newly created files.
			Case Administration
7/19/2023	AW	0.1	Communicate with J. Wine regarding claimants' contact information.
			Case Administration
7/20/2023	AW	0.3	Request update to Receivership web page.
			Case Administration
7/20/2023	JRW	0.2	Review updates to claims portal and related correspondence with claims vendor .
			Case Administration
7/21/2023	JR	0.3	Communication with J. Wine regarding request for copy of EBF mortgage for property, produce same (7749 Yates).
			Case Administration

SUBTOTAL:

[ 7.4      1,462.00 ]

Claims Administration & Objections

7/1/2023	JRW	0.4	Exchange correspondence with courtroom deputy regarding hearing date and related correspondence to claimants' counsel and SEC (set68).
			Claims Administration & Objections
7/2/2023	MR	0.2	Attention to scheduling of hearing and related exchanges with J. Wine and others (set68).
			Claims Administration & Objections
7/3/2023	AW	3	Attention to and confirm receipt of supplemental production (1700 Juneway) (.1); work with E. Duff to compile searchable set of documents produced by claimant (1700 Juneway) (1.6); communicate with claimants regarding sale of properties and claims process (set68) (.2); follow up with counsel regarding proposed responses to claimants emails (3030 E 79th, 6217 Dorchester, 7301 Stewart, 7500 Eggleston) (.3); review discovery responses and communicate with J. Wine regarding volume of same (Group 2) (.7); communicate with J. Wine regarding review chart for Group 2 claims (Group 2) (.1).

Claims Administration & Objections

Date	Indiv	Hours	Description
7/3/2023	ED	2.4	Begin review of additional disclosure docs produced by claimant (6160 MLK). Claims Administration & Objections
7/3/2023	JRW	1	Exchange multiple emails with claimants' counsel regarding rescheduling of hearing and related correspondence to courtroom deputy and discussions with team (set68) (.6); communications with A. Watychowicz and E. Duff regarding claimant document production (6160 MLK) (.1); attention to claimant inquiry regarding claims process (set73) (.1); confer with A. Watychowicz regarding preparation of Group 2 submission (Group 2) (.1); confer with A. Watychowicz regarding service of motions on claimants (set73) (.1). Claims Administration & Objections
7/3/2023	MR	0.1	Attention to rescheduling hearing (set68). Claims Administration & Objections
7/4/2023	MR	0.1	Follow up on scheduling for upcoming hearing (set68). Claims Administration & Objections
7/5/2023	AW	1.6	Further work on draft and communicate with J. Wine regarding claims analysis spreadsheet (Group 2). Claims Administration & Objections
7/5/2023	ED	2	Continue review of additional disclosure docs produced by claimant (6160 MLK) (1.1); prepare summary of information disclosed in claimant emails (6160 MLK) (.6); email correspondence to J. Wine, A. Watychowicz, and K. Duff regarding analysis of additional claimant discovery documents (6160 MLK) (.3). Claims Administration & Objections
7/5/2023	JR	6.5	Update claim review checklist with Group 3 property claim submissions (7927 Essex) (.3); continue working on claims, review claims submissions for properties (400 S Kilbourn, 4315 Michigan, 526 W 78th, 6355 Talman, 6356 California, 6558 Vernon, 6801 East End, 701 S 5th, 7051 Bennett, 7442 Calumet, 7546 Saginaw, 7616 Phillips, 7656 Kingston, SSDF4) (6.2). Claims Administration & Objections
7/5/2023	JRW	1	Confer with A. Watychowicz regarding email to all claimants regarding motions and hearing date (set73) (.1); exchange correspondence with courtroom deputy regarding rescheduled hearing (Group 2) (.1); confer with J. Rak regarding claim against property (701 S 5th) (.1); confer with A. Watychowicz regarding spreadsheet of recommendations for Group 2 and related review of same (Group 2) (.5); correspondence with K. Duff regarding claimant inquiry (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.2). Claims Administration & Objections
7/5/2023	MR	0.2	Attention to rescheduling of hearing (set68). Claims Administration & Objections

Date	Indiv	Hours	Description
7/6/2023	AW	1	Draft email to claimants and related email exchanges with J. Wine (6437 Kenwood, 7635 East End, 7749 Yates) (.3); attention to exchange regarding recorded claim (526 W 78th) (.1); communicate with S. Zjalic regarding preparation of materials for upcoming hearing (set68) (.2); review notes and documents and communicate with E. Duff regarding review of document production (6160 MLK) (.4).
			Claims Administration & Objections
7/6/2023	JR	6	Continue working on claims, review claims submissions for properties (400 Kilbourn, 5201 Washington, 526 W 78th, 6356 California, 6558 Vernon, 6801 East End, 701 S 5th, 7051 Bennett, 7442 Calumet, 7546 Saginaw, 7616 Phillips, 7656 Kingston, SSDF4).
			Claims Administration & Objections
7/6/2023	JRW	1.3	Attention to claimant inquiries (set73) (.8); confer with J. Rak regarding updating claim data (526 W 78th) (.1); telephone conference with K. Duff and M. Rachlis regarding pending motions, to-do list, and status of claims review (set68) (.4).
			Claims Administration & Objections
7/6/2023	MR	0.4	Conference with K. Duff and J. Wine regarding status of claims review and related tasks and issues (set68).
			Claims Administration & Objections
7/6/2023	SZ	0.7	Document preparation for status hearing on presentment of motions on Group 3 claims submissions (Group 3).
			Claims Administration & Objections
7/7/2023	AW	2.4	Email claimant regarding Receiver's submission (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.1); communicate with claimants regarding status on claims process (1131 E 79th, 3030 E 79th, 11117 Longwood, 7026 Cornell, 7301 Stewart, 7500 Eggleston, 7546 Saginaw, 7635 East End, 7749 Yates) (.6); attention to emails from claimants with update to their contact information (4317 Michigan, 6001 Sacramento, 7834 Ellis, 8100 Essex, 8326 Ellis) (.3); email K. Duff regarding Receivership funds (6250 Mozart, 6356 California, SSDF4) (.1); communicate with counsel regarding claimants' inquiries and proposed responses (1131 E 79th, 4520 Drexel, 7024 Paxton, 7546 Saginaw) (.3); communicate with K. Duff regarding documents and communicate with counsel regarding requested documents (6160 MLK) (.6); update master claims list and request updates to claims (6250 Mozart, 701 S 5th) (.4).
			Claims Administration & Objections
7/7/2023	JR	2.5	Continue working on claims, review claims submissions for properties (701 S 5th, 7600 Kingston, 8326 Ellis).
			Claims Administration & Objections
7/7/2023	JRW	2.2	Attention to claimant inquiries regarding claims process (set68) (.2); confer with A. Watychowicz regarding standard discovery responses (Group 2) (.1); review standard discovery responses and prepare checklist for reviewing same (Group 2) (1.1); telephone conference with K. Duff regarding analysis of claims and potential for global resolution (1131 E 79th, 7024 Paxton) (.8).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
7/9/2023	JRW	1.1	Conference with K. Duff and M. Rachlis regarding appeal and potential resolution of claims (1131 E 79th, 7024 Paxton) (.9); exchange correspondence with claimants' counsel regarding settlement discussions (1131 E 79th, 7024 Paxton) (.1); confer with K. Duff regarding discovery issue (Group 2) (.1).
			Claims Administration & Objections
7/9/2023	MR	0.9	Participate in meeting regarding appeal and potential resolution of claims (1139 E 79th, 7024 Paxton).
			Claims Administration & Objections
7/10/2023	AW	1	Communicate with claimant regarding status on claims process (1102 Bingham, 2736 W 64th, 8209 Ellis) (.1); work with K. Duff and J. Wine on responses to claimants' questions (3030 E 79th, 4351 Calumet, 4611 Drexel, 6160 MLK, 7301 Stewart, 7500 Eggleston, 9531 Fairfield) (.2); email claimant regarding his feedback on claims process (Group 2) (.1); follow up email to J. Wine regarding Group 2 discovery metrics (Group 2) (.2); communicate with J. Wine regarding update to claims process (6250 Mozart) (.1); work on and communicate with J. Wine and K. Pritchard regarding additional discovery and records (Group 2) (.3).
			Claims Administration & Objections
7/10/2023	JR	0.5	Continue working on claims, review claims submissions for properties (701 S 5th, 7600 Kingston, 8326 Ellis).
			Claims Administration & Objections
7/10/2023	JRW	1.8	Exchange correspondence with claimants' counsel regarding subpoenas (5450 Indiana, 7749 Yates) (.1); meet and confer with counsel for claimants regarding deficiencies in discovery responses (5450 Indiana, 7749 Yates) (.2); correspondence with K. Duff and M. Rachlis regarding discovery (Group 2) (.2); exchange correspondence with K. Duff regarding claimant inquiry (Group 2) (.1); review claimants discovery responses and related correspondence with J. Rak and A. Watychowicz (Group 2) (.5); attention to claimant inquiry regarding Receiver's submission (Group 3) (.1); prepare for hearing on claims issues (Group 2) (.6).
			Claims Administration & Objections
7/10/2023	KMP	0.2	Attention to service of subpoenas and related communication with EB team (Group 2).
			Claims Administration & Objections
7/10/2023	MR	1.5	Prepare for upcoming hearing (set68) (1.2); attention to claims discovery (Group 2) (.2); attention to meeting with claimant's counsel (1139 E 79th, 7024 S Paxton) (.1).
			Claims Administration & Objections



Date	Indiv	Hours	Description
7/11/2023	AW	1.5	<p>Call with E. Duff regarding processing of received discovery (1700 Juneway) (.2); prepare requested indexes of documents for four sets of production , privilege logs, and type of documents, and email E. Duff regarding same (1700 Juneway) (.5); work with produced documents (1700 Juneway) (.3); communicate with J. Wine regarding claims database (set68) (.1); review emails for record of subpoenas served by certain investor lenders and related email to counsel (Group 2) (.2); communicate with counsel regarding proposed emails to claimants regarding outcome of hearing (set68) (.2).</p> <p>Claims Administration &amp; Objections</p>
7/11/2023	ED	1.3	<p>Meet with M. Rachlis and J. Wine to discuss review of claims discovery documents (1700 Juneway) (.3); review of loan documents (1700 Juneway) (.9); call with A. Watychowicz regarding work with discovery documents (1700 Juneway) (.1).</p> <p>Claims Administration &amp; Objections</p>
7/11/2023	JR	2	<p>Continue working on claims, review claims submissions for properties (701 S 5th, 7834 Ellis, 7255 Euclid).</p> <p>Claims Administration &amp; Objections</p>
7/11/2023	JRW	4.9	<p>Continued review of materials in preparation for upcoming hearing (set68) (.7); confer with A. Watychowicz regarding status hearing (set68) (.1); confer with A. Watychowicz and J. Rak regarding discovery (Group 2) (.1); telephone conference with claimant's counsel regarding claims process and property groupings (1131 E 79th, 4520 Drexel, 4611 Drexel, 5001 Drexel, 6217 Dorchester, 6250 Mozart, 638 Avers, 7109 Calumet, 7255 Euclid) (.2); meet with E. Duff and M. Rachlis regarding claimant's discovery responses (1700 Juneway) (.3); meet with K. Duff and M. Rachlis to prepare for hearing (set68) (.8); appear for hearing before Judge Shah (set68) (.6); conference with Judge Shah and counsel for claimants regarding potential resolution of claims (1131 E 79th, 7024 Paxton) (.4); follow-up conference with K. Duff and M. Rachlis regarding potential resolution of claims (1131 E 79th, 7024 Paxton) (.3); study claims review notes, prepare same for import to portal, and related discussion with J. Rak (7749 Yates) (.8); exchange correspondence with claimants' counsel regarding service of subpoenas (Group 2) (.1); telephone conference with class counsel regarding upcoming hearing (defer) (.1); confer with A. Watychowicz and K. Duff regarding communications to claimants (Group 1) (.1); attention to claimant inquiry regarding court hearing (set73) (.1); review notes regarding claim review (7024 Paxton) (.2).</p> <p>Claims Administration &amp; Objections</p>
7/11/2023	MR	2.7	<p>Further prepare for and participate in hearing (set68) (1.6); participate in meeting with Judge Shan on potential settlement issues and related conferences with K. Duff and J. Wine (1139 E 79th, 7024 Paxton) (.7); attention to claims issues and review of claims and related conference with E. Duff and J. Wine (1700 Juneway) (.4).</p> <p>Claims Administration &amp; Objections</p>
7/11/2023	SZ	0.6	<p>Preparation for status hearing on presentment of motions on Group 3 claims submissions (Group 3).</p>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
7/12/2023	AW	4.1	Call with J. Wine and J. Rak regarding discovery responses (Group 2) (1.5); attention to proposed revisions to emails to claimants regarding outcome of hearing and email claimants (set68) (.4); attention to email from claimants' counsel regarding additional discovery and related communications with Receiver's counsel (Group 2) (.2); attention to email regarding claimant contact info, review contact sheet, and communicate with J. Wine regarding revisions (set68) (.4); work with claims documents and related email to E. Duff (1700 Juneway) (1.4); review emails and communicate with K. Duff regarding communications with claimant (7508 Essex, 7927 Essex, 8100 Essex, 8201 Kingston) (.2).
			Claims Administration & Objections
7/12/2023	JR	3.5	Communication with J. Wine and A. Watychowicz regarding review of Group 2 discovery responses from claimants (1700 Juneway, 5450 Indiana, 6160 MLK, 6949 Merrill, 7749 Yates) (1.5); review and analyze claim submissions for various claimants (7749 Yates) (1.8); communication with J. Wine regarding updates to claims for property (7749 Yates) (.2).
			Claims Administration & Objections
7/12/2023	JRW	4.1	Review correspondence from claimant's counsel, related review of notes regarding claims review and settlement correspondence, and prepare analysis for K. Duff and M. Rachlis (6949 Merrill) (.6); conference with J. Rak and A. Watychowicz regarding procedures for review of discovery materials (Group 2) (1.5); review claimants' discovery responses (6949 Merrill) (.8); exchange voice messages with counsel regarding subpoena (5450 Indiana, 7749 Yates) (.1); email and conferences with J. Rak regarding claims against property (7749 Yates) (.5); confer with K. Duff regarding claimant voice message and related telephone conference with claimant regarding claims process (1131 E 79th, 7508 Essex, 7927 Essex, 8100 Essex, 8201 Kingston) (.6).
			Claims Administration & Objections
7/12/2023	MR	0.1	Attention to Group 1 order on stay (Group 1).
			Claims Administration & Objections
7/13/2023	AW	1.5	Detailed email and follow up call with S. Zjalic regarding received discovery (1700 Juneway) (.4); email claimants regarding Receiver's submission (Group 3) (.2); attention to supplemental discovery response and record same (7749 Yates) (.2); email claimant regarding Court's ruling (6160 MLK) (.1); attention to email from claimant regarding entity, research regarding same and related email with J. Wine (2736 W 64th, 7750 Muskegon) (.2); draft email to claimant regarding claims process and grouping (8100 Essex) (.1); review email exchanges between Receiver's and claimant's counsel and communicate with J. Wine regarding access to claim documentation (6250 Mozart) (.2); follow up email K. Duff regarding Receivership funds (6250 Mozart, 6356 California. SSDF4) (.1).
			Claims Administration & Objections
7/13/2023	ED	1.9	Review of documents and correspondence submitted in connection with claim (1700 Juneway).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
7/13/2023	JR	4.3	Continue working on claims, review claims submissions for properties (6217 Dorchester, 701 S 5th, 7749 Yates) (2.5); review Group 2 discovery responses and update claimant information (5450 Indiana, 1700 Juneway, 6160 MLK) (1.8).
			Claims Administration & Objections
7/13/2023	JRW	3.6	Attention to discovery review and exchange correspondence with J. Rak and A. Watychowicz regarding various issues related to claimants' discovery responses (Group 2) (.6); exchange various correspondence with claimants' counsel regarding subpoenas (Group 2) (.2); review claim notes and prior pleadings and related correspondence regarding secured status of claimant (8100 Essex) (.3); exchange correspondence with claimants' counsel regarding records (6250 Mozart) (.1); prepare for conference with counsel on potential resolution of claims (1131 E 79th, 7024 Paxton) (.6); exchange voice messages with counsel for subpoenaed party (5450 Indiana, 7749 Yates) (.1); attention to claimant inquiry regarding transfer of interest to trust (2736 W 64th, 7750 Muskegon) (.2); review discovery responses from claimants (6949 Merrill) (.6); research relating to claimant and potential impact on claim and prepare summary of same (1700 Juneway, 4317 Michigan, 5001 Drexel, 5955 Sacramento, 6356 California, 6949 Merrill, 7026 Cornell, 7625 East End, 7953 Marquette) (.9).
			Claims Administration & Objections
7/13/2023	MR	0.3	Attention to upcoming meeting with claimant's counsel (1179 E 79th, 7024 Paxton).
			Claims Administration & Objections
7/13/2023	SZ	0.5	Work with Group 2 document production and related communications with A. Watychowicz (1700 Juneway).
			Claims Administration & Objections
7/14/2023	AW	1.3	Review prior correspondence from claimant, communicate with counsel regarding same, and response to claimant regarding entity issue (1736 W 64th, 7750 Muskegon) (.2); attention to submission from claimant regarding his claim and related response (Group 3) (.1); follow up with claimant regarding his claim (8100 Essex) (.1); work on updates to contact information for claimants (Group 2) (.3); multiple attempts to access a secured shared folder to upload requested claim and related email exchanges with claimant's legal team (6250 Mozart) (.6).
			Claims Administration & Objections
7/14/2023	JR	4.5	Review written responses to discovery requests for 22 claimants, update claimants information in the database (5450 Indiana, 1700 Juneway, 7749 Yates, 6160 MLK).
			Claims Administration & Objections

Date	Indiv	Hours	Description
7/14/2023	JRW	3.2	Exchange correspondence with K. Duff regarding claimant (1700 Juneway, 4317 Michigan, 5001 Drexel, 5955 Sacramento, 6356 California, 6949 Merrill, 7026 Cornell, 7625 East End, 7953 Marquette) (.4); conference with M. Rachlis and review analysis from K. Duff in preparation for settlement discussion (1131 E 79th, 7024 Paxton) (.6); conference with counsel for claimants and M. Rachlis regarding potential resolution of claims (1131 E 79th, 7024 Paxton) (.7); conference with K. Duff and M. Rachlis regarding settlement discussion and strategy (1131 E 79th, 7024 Paxton) (.3); study accounting records regarding transfers in and out of property accounts and related follow-up correspondence to claimants' counsel (1131 E 79th, 7024 Paxton) (.8); telephone conference with J. Rak regarding claimants' discovery responses (1700 Juneway, 5450 Indiana) (.4).
			Claims Administration & Objections
7/14/2023	KMP	0.9	Prepare draft document requests to certain claimants and related communications with J. Wine (Group 2).
			Claims Administration & Objections
7/14/2023	MR	2.1	Prepare for meetings with claimant representatives and related conferences with K. Duff and J. Wine (1139 E 79th, 7024 Paxton) (1.5); review of various emails in follow up to meeting with claimant's counsel (1139 E 79th, 7024 Paxton) (.3); attention to claimant's claims and related associated issues (1700 Juneway, 4317 Michigan, 5001 Drexel, 5955 Sacramento, 6356 California, 6949 Merrill, 7026 Cornell, 7625 East End, 7953 Marquette) (.3).
			Claims Administration & Objections
7/17/2023	AW	2.6	Work on updates to contact information for claimants (Group 2) (.3); email claimant regarding status and scheduled hearing (8100 Essex) (.1); communicate with counsel regarding Receiver's submission and claimants' position (Group 3) (.1); draft status report on Group 3 claims process and related email to counsel (Group 3) (1.0); communicate with technical support regarding access to database and upload claimant's requested documents (6250 Mozart) (.3); work with K. Pritchard and S. Zjalic to complete document review work (1700 Juneway) (.8).
			Claims Administration & Objections
7/17/2023	JR	3.5	Review supporting documents along with written responses to discovery requests from approximately 18 claimants, update our database with the supporting documents and claimant information (1700 Juneway, 5450 Indiana, 6160 MLK, 7749 Yates).
			Claims Administration & Objections
7/17/2023	JRW	1.5	Work with A. Watychowicz to prepare and revise status report on Group 3 proceedings and related correspondence with K. Duff (Group 3) (.5); work with K. Pritchard, M. Rachlis and K. Duff on preparation and revision of requests for production and related research (5450 Indiana, 7749 Yates) (.7); telephone conference with class counsel regarding fairness hearing and related review of docket (defer) (.3).
			Claims Administration & Objections

Date	Indiv	Hours	Description
7/17/2023	KMP	1.1	Revise draft document requests to certain claimants and related communications with J. Wine, K. Duff and M. Rachlis (Group 2). Claims Administration & Objections
7/17/2023	MR	1.1	Attention to Group 3 follow up on claims status (Group 3) (.3); attention to Group 2 discovery to investors (5450 Indiana, 7749 Yates) (.6); attention to third-party litigation issues (defer) (.2). Claims Administration & Objections
7/17/2023	SZ	1.3	Continue to work with Group 2 document production (1700 Juneway) (.8); communications with A. Watychowicz regarding document conversion (.2); further work on claims documentation production files (1700 Juneway) (.3). Claims Administration & Objections
7/18/2023	AW	2.2	Call with J. Wine and J. Rak regarding review of discovery responses (Group 2) (.4); communicate with J. Wine regarding update to contact info prior to potential distribution (Group 3) (.1); communicate with E. Duff regarding completed work with claimant documents (1700 Juneway) (.1); attention to email from J. Wine regarding entered order and convert same to workable format (5201 Washington) (.1); review discovery responses and detailed notes regarding same (1700 Juneway) (1.2); review affidavit and email J. Wine regarding request to counsel (defer) (.2); review discovery responses and email J. Rak regarding claimant documents (Group 2) (.1). Claims Administration & Objections
7/18/2023	ED	2.3	Continue review of claimant document production (1700 Juneway) Claims Administration & Objections
7/18/2023	JR	4.7	Communication with J. Wine and A. Watychowicz regarding the status of review of Group 2 discovery responses from claimants (1700 Juneway, 5450 Indiana, 6160 MLK, 6949 Merrill, 7749 Yates) (.9); review Group 2 discovery request responses and update claimant information from 20 claimants regarding various property claims (5450 Indiana, 6160 MLK) (3.8). Claims Administration & Objections
7/18/2023	JRW	0.5	Meet with J. Rak and A. Watychowicz regarding discovery review (Group 2) (.4); confer with J. Rak regarding claims issue (5450 Indiana) (.1). Claims Administration & Objections
7/19/2023	AW	0.8	Review discovery responses and detailed notes regarding same (1700 Juneway) (.6); communicate with J. Wine regarding submitted claim in class action and related email to class action counsel (defer) (.2). Claims Administration & Objections
7/19/2023	JR	5.5	Review discovery request responses, including review of approximately 50 MB of supporting documents submitted to the Receiver for review from 30 different claimants, update our database with updated claimant submissions (5450 Indiana, 6160 MLK, 7749 Yates). Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
7/20/2023	AW	1.6	Review claimant discovery responses and detailed notes regarding same (1700 Juneway, 7749 Yates, 6160 MLK) (1.1); communications with J. Wine regarding claimant's discovery responses and potential request for clarification (1700 Juneway, 6160 MLK) (.2); updates to claimants' contact information (Group 2) (.3).
			Claims Administration & Objections
7/20/2023	JR	2.5	Review Group 2 discovery request responses submitted from approximately 10 claimants, update our records with pertinent claim information, (5450 Indiana, 6160 MLK, 7749 Yates).
			Claims Administration & Objections
7/20/2023	JRW	0.2	Confer with class counsel regarding fairness hearing and related correspondence (defer).
			Claims Administration & Objections
7/20/2023	MR	0.4	Attention to status and issues on third-party litigation (defer) (.1); attention to third-party court decision (defer) (.3).
			Claims Administration & Objections
7/21/2023	AW	1.7	Attention to discovery responses and document production and related email exchange with counsel (Group 2) (.2); email exchanges with counsel regarding status report, finalize status report, file with the Court, and email to claimants regarding same (Group 3) (.6); attention to document production from title company and related email to counsel (Group 2) (.2); review requests for production to third party, compile exhibits, and related email to counsel (5450 Indiana, 7749 Yates) (.4); research regarding recorded mortgage and related email exchanges with J. Wine and J. Rak (7749 Yates) (.2); draft response to claimant's inquiry (2909 E 78th, 7549 Essex, 8047 Manistee) (.1).
			Claims Administration & Objections
7/21/2023	ED	0.4	Email correspondence to J. Wine, M. Rachlis, and K. Duff regarding review of claimant document production (1700 Juneway).
			Claims Administration & Objections
7/21/2023	JR	4	Continued extensive review of answers and supporting documents to our discovery request of approximately 20 MB of documents submitted by claimants, update our database with updated claimant information (5450 Indiana, 6160 MLK).
			Claims Administration & Objections
7/21/2023	JRW	1.4	Exchange correspondence with K. Duff regarding requests for production and further revise same (5450 Indiana, 7749 Yates) (.5); finalize Group 3 status report for filing and related correspondence regarding email to claimants (Group 3) (.2); attention to claimant inquiry regarding property accounts (set73) (.1); attention to claimant inquiry (2909 E 78th, 7549 Essex, 8047 Manistee) (.1); review discovery responses (7749 Yates) (.5).
			Claims Administration & Objections
7/21/2023	KMP	0.2	Communications with EB team regarding draft discovery requests relating to Group 2 (Group 2).

Date	Indiv	Hours	Description
			Claims Administration & Objections
7/21/2023	MR	0.8	Attention to Group 3 claims status report (Group 3) (.3); attention to response to inquiry from claimant (set73) (.2); attention to discovery review regarding various claims (1700 Juneway, 6160 MLK) (.2); attention to status on draft discovery (Group 2) (.1)
			Claims Administration & Objections
7/24/2023	AW	1	Email responses to claimants' inquiries (2909 E 78th, 3030 E 79th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee) (.2); preparation of requests for production of documents to third-parties and email claimants and counsel regarding same (Group 2) (.8).
			Claims Administration & Objections
7/24/2023	JR	2.5	Review and update our database with information provided from claimant's discovery request submissions received from approximately 15 claimants for group 2 properties (5450 Indiana, 6160 MLK).
			Claims Administration & Objections
7/24/2023	KMP	0.2	Communicate with A. Watychowicz regarding discovery requests to certain investors (Group 2).
			Claims Administration & Objections
7/24/2023	MR	0.9	Attention to various issues regarding discovery (5450 Indiana, 6160 MLK, 7794 Yates) (.4); attention to subpoena (Group 2) (.2); attention to brief on Group 1 issue (Group 1) (.3).
			Claims Administration & Objections
7/25/2023	AW	1.1	Review of discovery responses and detailed notes regarding same (1700 Juneway) (.9); reach out to settlement claims administrator with request to update service list (defer) (.1); email claimant regarding funds (6250 Mozart, 6356 California, SSDF4) (.1).
			Claims Administration & Objections
7/25/2023	JR	6	Continue review of discovery request responses, along with review of approximately 150 MB of supporting documents provided by claimants for group 2 property submitted by 30 claimants (6160 MLK).
			Claims Administration & Objections
7/26/2023	AW	0.2	Attention to correspondence from claimant and related update in database and contact sheet (7255 Euclid).
			Claims Administration & Objections
7/26/2023	JR	3.8	Review Group 2 discovery request responses submitted from 20 claimants, confirm discovery responses by reviewing original claims due to discrepancies provided in discovery requested responses, update database with correct claim information (6160 MLK).
			Claims Administration & Objections
7/27/2023	AW	4.6	Review of discovery responses and detailed notes regarding same (1700 Juneway) (4.3); communicate with J. Wine regarding request for new verification (1700 Juneway) (.1); compile requested pleadings related to appeal and related email to M. Rachlis (Group 1) (.2).
			Claims Administration & Objections

Date	Indiv	Hours	Description
7/27/2023	JR	5.4	Review discovery request responses from approximately 25 claimants, update database with updated information, further review original claims submitted by claimants with discrepancies and update our records with same (6160 MLK, 7749 Yates). Claims Administration & Objections
7/27/2023	MR	1.5	Work on appellate brief (Group 1). Claims Administration & Objections
7/28/2023	AW	5.8	Attention to supplemental document production and related email to Receiver's counsel (6949 Merrill) (.2); complete review of discovery responses, detailed notes regarding same, and extensive update to claimants' contact information (1700 Juneway) (5.6). Claims Administration & Objections
7/28/2023	JR	5.8	Extensive updates to our records with analysis of 30 claimants discovery request responses, some additional review of original claims necessary to resolve inconsistencies provided in discovery responses (7749 Yates). Claims Administration & Objections
7/31/2023	AW	1.7	Attention to supplemental document production and related email to counsel (6160 MLK) (.2); follow up communication with counsel regarding access to documents and attention to accessible production (6160 MLK) (.4); confirm receipt of supplemental productions and communicate with counsel regarding same (1700 Juneway, 5450 Indiana, 7749 Yates) (.2); follow up with J. Wine regarding service of additional discovery (Group 2) (.1); attention to discovery responses from third-party and related communication with J. Wine and K. Pritchard (Group 2) (.1); update email addresses in database (Group 2) (.7). Claims Administration & Objections
7/31/2023	JR	3.9	Continued review of 22 discovery request responses and review of approximately 175 MB of supporting documents, update our database with updated records (7749 Yates). Claims Administration & Objections
7/31/2023	JRW	1.6	Telephone conference with subpoenaed party regarding extension and response to subpoena (5450 Indiana, 7749 Yates) (.2); review correspondence and documents from subpoenaed party (5450 Indiana, 7749 Yates) (.4); prepare analysis of proceeds and claims (5450 Indiana, 7749 Yates) (.7); exchange correspondence and voice messages with counsel for subpoenaed party regarding extension of time to respond to subpoena and proof of service of same (6949 Merrill) (.1); correspondence with counsel for claimants regarding former property and related research regarding disposition of same (defer) (.2). Claims Administration & Objections

SUBTOTAL:

[ 177.2      34,191.00 ]

Status Reports



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
7/10/2023	AW	0.5	Review email traffic and provide details of same during second quarter of 2023 to J. Wine (.4); follow up communication with J. Wine regarding email traffic (.1). Status Reports
7/10/2023	JRW	0.8	Conference with K. Duff regarding next status report (.1); exchange correspondence with K. Pritchard, A. Watychowicz, and counsel in other actions regarding second quarter status report and begin drafting same (.7). Status Reports
7/10/2023	KMP	2.5	Communication with J. Wine regarding preparation of exhibits for 2Q2023 status report (.1); exchange correspondence with bank representative regarding updated balances for Receiver's accounts in connection with 2Q2023 reporting (.2); begin preparation of financial exhibits for 2Q2023 status report (2.2). Status Reports
7/11/2023	AW	0.1	Further follow up communication with J. Wine regarding email traffic in Receiver's account. Status Reports
7/12/2023	JRW	0.5	Attention to drafting second quarter status report. Status Reports
7/12/2023	KMP	2.7	Continue preparation of financial exhibits for 2Q2023 status report. Status Reports
7/13/2023	AW	0.2	Communications with J. Wine regarding proposed additional exhibits to status report and revisions to status report . Status Reports
7/13/2023	JRW	0.1	Confer with A. Watychowicz regarding format of and potential attachment to second quarter status report. Status Reports
7/13/2023	KMP	2.9	Continue preparation of financial exhibits for 2Q2023 status report and related communications with J. Wine. Status Reports
7/14/2023	JRW	2.4	Attention to preparation of second quarter status report. Status Reports
7/14/2023	KMP	0.3	Communications with J. Wine regarding certain exhibits to status report and review data to confirm accuracy of exhibits. Status Reports
7/17/2023	JRW	5.5	Continued drafting of second quarter status report and related research regarding status of matters. Status Reports
7/18/2023	JRW	1.5	Continued research, drafting, and revision of second quarter status report. Status Reports
7/18/2023	KMP	0.2	Communicate with J. Wine regarding 2Q2023 status report. Status Reports

Date	Indiv	Hours	Description
7/19/2023	JRW	0.4	Further revisions to status report and related conferences with A. Watychowicz. Status Reports
7/19/2023	MR	1	Review and comment on status report. Status Reports
7/20/2023	JRW	1.2	Review redlines and related correspondence regarding status report for second quarter 2023, and further revise same (.8); continued research regarding related case and orders (.4). Status Reports
7/20/2023	MR	0.3	Attention to new draft of status report. Status Reports
7/21/2023	AW	2.6	Review status report and finalize exhibits and related communications with counsel and K. Pritchard (1.9); further revisions to status report and exhibits and related email to counsel (.7). Status Reports
7/21/2023	JRW	2	Additional revisions to second quarter status report and exhibits and related correspondence . Status Reports
7/21/2023	KMP	0.2	Communications with EB team regarding draft status report and exhibits. Status Reports
7/21/2023	MR	0.2	Further attention to and revisions to status report. Status Reports
7/24/2023	KMP	0.2	Attention to comments on draft status report. Status Reports
7/27/2023	JRW	0.4	Review comments regarding draft status report and revise accordingly. Status Reports
7/28/2023	AW	0.1	Email K. Duff regarding J. Wine's proposed revisions. Status Reports
7/31/2023	AW	1.1	Final revisions to status report and related email exchange with counsel (.4); finalize status report, file with the Court, and email claimants regarding same (.7). Status Reports
7/31/2023	JRW	0.6	Attention to finalizing status report and exhibits for filing. Status Reports
7/31/2023	MR	0.3	Attention to final draft and submission of status report. Status Reports

SUBTOTAL:

[ 30.8      6,610.00 ]

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
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		217.4	\$42,543.00
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<u>Other Charges</u>	<u>Description</u>	
	Google Suite for July 2023	144.00
		144.00
SUBTOTAL:		[ 144.00 ]
		144.00
Total Other Charges		\$144.00

<u>Summary of Activity</u>			
	<u>Hours</u>	<u>Rate</u>	
Duff, Ellen	10.30	390.00	\$4,017.00
Pritchard, Kathleen M.	13.00	140.00	\$1,820.00
Rachlis, Michael	15.10	390.00	\$5,889.00
Rak, Justyna	78.50	140.00	\$10,990.00
Watychowicz, Ania	48.40	140.00	\$6,776.00
Wine, Jodi Rosen	48.80	260.00	\$12,688.00
Stoja Zjalic	3.30	110.00	\$363.00

**SUMMARY**

Legal Services	\$42,543.00
Other Charges	\$144.00
<b>TOTAL DUE</b>	<b>\$42,687.00</b>

## Rachlis Duff & Peel, LLC

542 SOUTH DEARBORN STREET  
SUITE 900  
CHICAGO, ILLINOIS 60605

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

October 13, 2023

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. 6622162

Legal Fees for August 2023	\$58,747.00
Expenses Disbursed	<u>\$856.51</u>
<b>Due this Invoice</b>	<b>\$59,603.51</b>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
<u>Accounting/Auditing</u>			
8/2/2023	KMP	0.5	Review account information from bank platforms to reconcile Receiver's accounts. Accounting/Auditing
8/3/2023	KMP	1.6	Further review account information from bank platforms to reconcile Receiver's accounts and related communications with bank representative . Accounting/Auditing
8/7/2023	KMP	0.2	Follow up with bank representative regarding issue relating to reconciliation of Receiver's accounts. Accounting/Auditing
8/8/2023	KMP	0.2	Follow up on issue relating to reconciliation of Receiver's accounts. Accounting/Auditing
8/10/2023	KMP	0.2	Communicate with J. Wine and bank representative regarding issues relating to reconciliation of Receiver's accounts. Accounting/Auditing
8/11/2023	KMP	0.2	Review online banking records and communicate with bank representative regarding resolution of issues relating to reconciliation of Receiver's accounts. Accounting/Auditing
SUBTOTAL:			[ 2.9      406.00 ]

Business Operations

8/4/2023	JR	0.9	Communication with A. Porter and K. Duff relating to property tax refund, draft letter to buyer for a request to endorse refund checks, prepare transmittal of same (7109 Calumet). Business Operations
8/17/2023	KMP	0.3	Communications with insurance broker , K. Duff, and J. Wine regarding details of insurance premium refund for various sold properties (4520 Drexel, 4611 Drexel, 7109 Calumet, 7255 Euclid, 8201 Kingston). Business Operations
8/18/2023	JRW	0.1	Communications with K. Pritchard and K. Duff regarding insurance refunds (4520 Drexel, 4611 Drexel, 7109 Calumet, 7255 Euclid, 8201 Kingston). Business Operations
8/18/2023	KMP	0.4	Communications with K. Duff, and J. Wine regarding transfers to property accounts for insurance premium refunds and effectuate transfers (4520 Drexel, 4611 Drexel, 7109 Calumet, 7255 Euclid, 8201 Kingston). Business Operations
8/21/2023	JR	0.2	Prepare correspondence to buyer relating to property tax refund (7109 Calumet).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Business Operations
8/21/2023	KMP	0.2	Communicate with K. Duff regarding funds received by former property manager for sold property (6217 Dorchester).
			Business Operations
8/30/2023	JR	0.2	Communication with K. Duff and K. Pritchard requesting to process bank deposit relating to property tax refunds, prepare same (7109 Calumet).
			Business Operations
8/30/2023	KMP	0.2	Confer with J. Rak regarding deposit of tax refund checks to property account (7109 Calumet).
			Business Operations
SUBTOTAL:			[ 2.5      362.00 ]

Case Administration

8/1/2023	JRW	2.3	Study data imported to test portal and related analysis with claims vendor . Case Administration
8/2/2023	AW	0.1	Communicate with J. Wine regarding court hearing issue. Case Administration
8/2/2023	JRW	0.1	Confer with A. Watychowicz regarding claimant feedback regarding court proceedings . Case Administration
8/3/2023	JRW	0.1	Exchange correspondence with claims vendor regarding meeting on database. Case Administration
8/3/2023	KMP	0.2	Communicate with K. Duff regarding electronic access to bank statements. Case Administration
8/4/2023	AW	0.3	Prepare update to Receivership webpage and related email to IT vendor. Case Administration
8/4/2023	JRW	0.5	Conference call with vendor regarding status of database project and related issues . Case Administration
8/9/2023	JRW	1.1	Exchange correspondence with claims vendor regarding meeting on database (.1); conferences with J. Rak regarding preparation of spreadsheets for import to review platform and related review and revision of same (1.0). Case Administration
8/10/2023	JR	3.2	Final review and revisions to property sheets in preparation for the transfer of data into the claims platform and update various claims with additional information.



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Case Administration
8/10/2023	KMP	0.2	Communicate with EB team regarding notice from state agency .
			Case Administration
8/11/2023	JR	5.2	Final review and revisions to property sheets in preparation for the transfer of data into the claims platform, communication with J. Wine on final review of claims and update various claims .
			Case Administration
8/11/2023	JRW	2.1	Confer with J. Rak regarding import of spreadsheets to claims portal (.5); study results of import, prepare notes regarding same, and related correspondence to claims vendor (1.6).
			Case Administration
8/14/2023	AW	0.5	Communicate with IT vendor regarding updates to receivership web page (.2); attention to order granting motions to withdraw and update service and email lists (.3).
			Case Administration
8/15/2023	AW	0.1	Follow up with IT vendor regarding update to receivership page.
			Case Administration
8/15/2023	JRW	0.1	Work with J. Rak on preparing spreadsheets for import to claims portal.
			Case Administration
8/16/2023	KMP	0.4	Confer with A. Watychowicz regarding expense associated with preparation of appellate brief (.2); communicate with insurance broker requesting detailed information regarding insurance refund and related communication with K. Duff (.2).
			Case Administration
8/17/2023	AW	0.2	Follow up with IT vendor regarding requested updates and follow up with revisions to receivership webpage.
			Case Administration
8/17/2023	JR	3.2	Final review and revisions to property sheets in preparation for the transfer of data into the claims platform.
			Case Administration
8/17/2023	JRW	0.3	Confer with A. Watychowicz regarding portal functionality and related correspondence to vendor .
			Case Administration
8/18/2023	JR	5.8	Final review and revisions to property sheets in preparation for the transfer of data into the claims platform.
			Case Administration
8/18/2023	JRW	0.2	Confer with K. Duff regarding status of claims review (.1); exchange correspondence with vendor regarding outstanding issues (.1).
			Case Administration
8/21/2023	JR	0.5	Exchange communication with J. Wine relating to review and revision of properties sheets in anticipation for data transfer to claims platform.
			Case Administration

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
8/21/2023	JRW	0.7	Exchange correspondence with A. Watychowicz regarding numbering of claims and duplicative claims in portal and related review of spreadsheet (.3); confer with J. Rak regarding preparation of review sheets for import and conflicting information (.2); confer with A. Watychowicz and J. Rak regarding claim review procedures (.2).  Case Administration
8/22/2023	AW	0.3	Review claims and confirm they were entered properly in database.  Case Administration
8/22/2023	JR	4.7	Final review and revisions to property sheets in preparation for the transfer of data into the clais platform (3.2); exchange communication with J. Wine regarding recommendations for properties and related review of records in claims portal (.5); further communication with J. Wine addressing fund and property claims and revisions to same (.5); communication with J. Wine relating to current status, overview and next steps in claims process (.5).  Case Administration
8/22/2023	JRW	1.1	Work with J. Rak on preparing spreadsheets for import to portal (.8); correspondence to vendor regarding issues related to data import (.1); correspondence to K. Duff regarding status of claims review (.2).  Case Administration
8/23/2023	JR	5.3	Revisions for various properties in anticipation of data transfer into claims portal and related communication with J. Wine (.8); review email from J. Wine requesting explanation for claimant review and further analysis of claim to provide same (4.5).  Case Administration
8/23/2023	JRW	1.9	Attention to revising spreadsheets in preparation for import to claims portal (1.3); confer with A. Watychowicz regarding activity in Group 2 distribution list (.1); confer with J. Rak regarding review procedures (.2); review and comment on judgment (.1); work with vendor regarding batch printing issue (.2).  Case Administration
8/24/2023	JR	5.5	Revise various property claim information on property sheets in anticipation for data transfer into claims portal for claimant , and related communication with J. Wine (3.8); continue revisions to property sheets in anticipation for data transfer (1.2); communication with J. Wine relating to final review and updates of claim data in anticipation for data transfer (.5).  Case Administration
8/24/2023	JRW	2.5	Continued revisions of EBF mortgagee spreadsheets for import to claims portal (1.9); confer with J. Rak regarding preparation for imports (.5); exchange correspondence with vendor regarding required updates to claims portal (.1).  Case Administration
8/25/2023	JR	4.8	Final review and revisions of property sheets in preparation for the transfer of data into the claims platform.  Case Administration

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
8/25/2023	JRW	5.3	Continued attention to preparing spreadsheets for import to claims portal (3.9); email exchanges and telephone conference with vendor regarding sample import and other outstanding issues (.7); confer with J. Rak regarding claims review processes and procedures (.4); confer with A. Watychowicz regarding claims needing to be split and update chart for vendor (.3). Case Administration
8/28/2023	JR	5.5	Final review and revision of property sheets in preparation for the transfer of data into the claims platform. Case Administration
8/28/2023	JRW	0.2	Exchange correspondence with claims vendor and J. Rak regarding data import and error report. Case Administration
8/29/2023	AW	0.4	Communicate with IT vendor regarding revisions and updates to receivership page. Case Administration
8/29/2023	JR	0.4	Communication with J. Wine relating to status of property claim information sheet revisions and further discuss importation of data into claims platform. Case Administration
8/29/2023	JRW	0.4	Confer with J. Rak regarding claims portal . Case Administration
8/30/2023	AW	0.3	Review court rules on pro se submissions and appearances in connection with claimant communication and related email to J. Wine. Case Administration
8/30/2023	JRW	0.5	Prepare spreadsheet for claims vendor regarding split claims (.3); exchange correspondence regarding response to claimant inquiry regarding receivership funds (.2). Case Administration
8/31/2023	JRW	0.4	Confer with A. Watychowicz regarding new claims and split claims, update spreadsheet, and related correspondence to claims vendor. Case Administration

SUBTOTAL:

[ 66.9      11,742.00 ]

Claims Administration & Objections

8/1/2023	AW	0.5	Attention to documents produced in response to subpoena and related email to Receiver's counsel (Group 2) (.1); process document production and related email to E. Duff (6160 MLK) (.4). Claims Administration & Objections
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Date	Indiv	Hours	Description
8/1/2023	JR	7.5	Review Group 2 discovery responses and update claimant information as it relates to changes and/or modifications originally submitted by the claimants via proof of claims (7749 Yates) (1.5); extensive review of claims submissions for properties and possible duplicative claims submitted by claimant (701 S 5th, 7237 Bennett, 7255 Euclid, 7834 Ellis, 8326 Ellis) (3.2); continue working on claims, review claims submissions for properties (1102 Bingham, 11117 Longwood, 431 E 42nd, 701 S 5th, 7109 Calumet, 7616 Phillips, SSDF4) (2.8).
			Claims Administration & Objections
8/2/2023	AW	1	Email claimant with request to supplement verification (1700 Juneway) (.1); attention to custodian updates from claimant, related email to claimant and updates to database (1131 E 79th, 1700 Juneway, 2909 E 78th, 3030 E 79th, 701 E 5th, 7301 Stewart, 7500 Eggleston, 7549 Essex, 8047 Manistee, SSDF4) (.3); updates to claimants' contact information (Group 2) (.6).
			Claims Administration & Objections
8/2/2023	JR	4.2	Continue working on claims, review claims submissions for properties (4528 Michigan, 4611 Drexel, 7109 Calumet, 7616 Phillips, SSDF4).
			Claims Administration & Objections
8/2/2023	JRW	0.1	Exchange correspondence with K. Duff regarding proposed declaration (defer).
			Claims Administration & Objections
8/2/2023	MR	4.2	Research and work on appellate brief (Group 1).
			Claims Administration & Objections
8/3/2023	AW	2.3	Email claimant regarding past and pending groupings of properties (4520 Drexel) (.1); follow up with counsel regarding response to claimant and communicate with claimant regarding appeal issues (7201 Constance) (.1); review appellee's brief and communicate with M. Rachlis regarding proposed revisions and required forms (Group 1) (2.1).
			Claims Administration & Objections
8/3/2023	JR	2.9	Continue working on claims, review claims submissions for properties (4520 Drexel, 4528 Michigan, 4611 Drexel, 5001 Drexel, 7109 Calumet, 7616 Phillips, SSDF4).
			Claims Administration & Objections
8/3/2023	JRW	0.3	Exchange correspondence regarding claimant inquiry regarding appeal (Group 1) (.1); exchange correspondence with K. Duff and claimants' counsel regarding appeal (Group 1) (.2).
			Claims Administration & Objections
8/3/2023	MR	3.6	Further work on 7th Circuit brief and review related materials (Group 1).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
8/4/2023	JRW	1.6	Confer with K. Duff regarding appeal (Group 1) (.2); study amicus brief, (Group 1) (1.0); telephone conference with claimants' counsel regarding appellee briefs (Group 1) (.3); exchange correspondence with K. Duff regarding class action (defer) (.1). Claims Administration & Objections
8/7/2023	AW	1.2	Research relating to appellee's brief and email exchange with M. Rachlis (Group 1) (.7); research regarding collected records and access to database for claimants and related email to K. Duff (Group 1) (.5). Claims Administration & Objections
8/7/2023	JR	6.1	Continue working on claims, review claims submissions for properties (4520 Drexel, 4611 Drexel, 638 Avers, 7546 Saginaw, 7600 Kingston, SSDF1, SSDF4) (5.8); communication with J. Wine and A. Watychowicz relating to additional submitted claims (7600 Kingston, 7748 Essex, SSDF4) (.3). Claims Administration & Objections
8/7/2023	JRW	0.5	Telephone conference and correspondence with K. Duff regarding class action settlement (defer) (.2); telephone conference with K. Duff regarding appeal (Group 1) (.1); confer with J. Rak regarding misidentified claim (4611 S Drexel) (.2). Claims Administration & Objections
8/7/2023	MR	0.2	Attention to issues on appellate brief and related exchange with A. Watychowicz (Group 1). Claims Administration & Objections
8/8/2023	AW	1.2	Attention to email from claimant regarding settlement submission and related exchange with K. Duff and class action counsel (defer) (.3); attention to received documents and update database (2909 E 78th, 7549 Essex, 8047 Manistee) (.1); email J. Wine regarding received discovery responses and related follow up email exchanges and call (Group 2) (.3); research and communicate with K. Pritchard and J. Wine regarding rules, appendix, and citations in appellee's brief (Group 1) (.5). Claims Administration & Objections
8/8/2023	JR	5.5	Continue working on claims, review claims submissions for properties (1700 Juneway, 4520 Drexel, 4611 Drexel, 638 Avers, 6801 East End, 7546 Saginaw, 7600 Kingston, 816 Marquette, SSDF1, SSDF4). Claims Administration & Objections

Date	Indiv	Hours	Description
8/8/2023	JRW	4.4	Attention to claimant inquiry and related correspondence with A. Watychowicz and class counsel (defer) (.2); review and revise draft appellee brief (Group 1) (1.7); confer with A. Watychowicz regarding record on appeal and citations to same (Group 1) (.2); correspondence from claimants' counsel regarding discovery responses and related review of materials (Group 2) (.2); review claims submitted by claimant and confer with J. Rak regarding same (7600 Kingston, 7748 Essex, SSDF4) (.2); exchange correspondence with claims vendor and J. Rak regarding uploading of information from spreadsheets to database (set68) (.1); study appellants brief on appeal and record citations therein (Group 1) (1.8).
			Claims Administration & Objections
8/8/2023	KMP	0.2	Confer with A. Watychowicz regarding style and content issues relating to the appellate brief (1700 Juneway, 6949 Merrill).
			Claims Administration & Objections
8/9/2023	AW	1.7	Follow up with counsel regarding banking information from claimant (7237 Bennett, 7508 Essex, 7927 Essex, 8100 Essex, 8326 Ellis) (.1); review and revise appellee brief (Group 1) (1.6).
			Claims Administration & Objections
8/9/2023	JR	3.9	Continue working on claims, review claims submissions for properties (1700 Juneway, 4611 Drexel, 816 Marquette, 6437 Kenwood).
			Claims Administration & Objections
8/9/2023	JRW	3.3	Review status and related correspondence with K. Duff regarding claims review process (set56) (.2); review claim and confer with J. Rak regarding same (1700 Juneway, 4611 Drexel, 816 Marquette) (.2); exchange correspondence with J. Rak regarding claims and related review of same (4611 Drexel, 6160 MLK) (.3); confer with claimants' counsel regarding appeal briefing (Group 1) (.2); review and revise draft appeal brief and related communications with K. Duff and M. Rachlis (Group 1) (2.4).
			Claims Administration & Objections
8/9/2023	KMP	0.2	Attention to receipt of executed certified mail receipt for subpoena relating to Group 2 discovery and forward to EB team (Group 2).
			Claims Administration & Objections
8/10/2023	AW	2.6	Attention to current version of appellee's brief and incorporate revisions (Group 1) (1.3); research regarding amicus brief and entered opinions and related email to M. Rachlis (Group 1) (.6); review to enclosure to Rule 26.1 disclosures, finalize, and file with the court (Group 1) (.5); confirm and communicate with counsel regarding references in appellate brief (Group 1) (.2).
			Claims Administration & Objections
8/10/2023	JRW	6.5	Review multiple rounds of revisions and further revise draft appellee brief (Group 1) (4.1); review draft Seventh Circuit appearances and disclosure statement (Group 1) (.1); review claim and related correspondence with J. Rak (6160 MLK) (.2); conferences with K. Duff and M. Rachlis regarding appeal brief (Group 1) (.3); study claimants' draft brief on appeal (Group 1) (1.8).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
8/10/2023	MR	5.4	Further work on draft appellate brief (Group 1).
			Claims Administration & Objections
8/11/2023	AW	3	Review filings and email response to claimant regarding claims process (6160 MLK, 7834 Ellis) (.2); multiple communications and work with counsel and K. Pritchard to finalize appellee's brief (Group 1) (2.4); review claim and related email to J. Wine (1131 E 79th, 6001 Sacramento, 6801 East End, 8100 Essex, 8326 Ellis) (.3); attention to notice of availability and appellee's brief and related emails to counsel (Group 1) (.1).
			Claims Administration & Objections
8/11/2023	JRW	3.9	Exchange correspondence and telephone conference with claimants' counsel regarding arguments on appeal (Group 1) (.4); confer with M. Rachlis regarding comments on draft appeal brief (Group 1) (.3); review redlines and further revise draft appeal brief (2.5); attention to table of contents and authorities and finalization of appeal brief and related conferences with A. Watychowicz (Group 1) (.4); confer with J. Rak regarding claims review issues (6437 Kenwood, 8100 Essex) (.3).
			Claims Administration & Objections
8/11/2023	KMP	0.7	Several conferences with A. Watychowicz regarding issues relating to filing appellee's brief and review related rules (Group 1).
			Claims Administration & Objections
8/11/2023	MR	3.9	Complete filing of appellate brief (Group 1) (2.8); conference with J. Wine and review other briefs and issues (Group 1) (.8); follow up regarding same with claimant's counsel (Group 1) (.3).
			Claims Administration & Objections
8/14/2023	AW	1.9	Review prior communications with claimant and resolve email issue (7748 Essex, 7927 Essex) (.3); communicate with J. Wine about and email claimant regarding supporting documents and update claim file (6160 MLK, 7834 Ellis) (.2); follow up with J. Wine regarding email from claimant with banking information and make a record of same (7237 Bennett, 7508 Essex, 7927 Essex, 8100 Essex, 8326 Ellis) (.2); attention to approved brief of appellee and related email to counsel (Group 1) (.1); review appellate rules, communicate with K. Pritchard and arrange for filing of paper copies with the court and counsel (Group 1) (.3); research and communicate with M. Rachlis regarding notice of availability for oral argument (Group 1) (.3); draft letter of availability for oral argument and email M. Rachlis regarding same (Group 1) (.2); attention to certified mailing from claimant and draft response (8100 Essex) (.2); attention to filed Rule 26.1 disclosures and related email to counsel (Group 1) (.1).
			Claims Administration & Objections

Date	Indiv	Hours	Description
8/14/2023	JRW	5.7	Detailed review of claims against properties (7107 Bennett, 7748 Essex, SSDF4) (2.3); exchange correspondence regarding subpoena (1700 Juneway, 6949 Merrill) (.1); attention to certified mail from claimant and review and revise response to same (8100 Essex)(.3); attention to claimant inquiries (109 Laramie, 6001 Sacramento, 6160 MLK, 7107 Bennett, 7625 East End, 7834 Ellis, 8326 Ellis) (.4); detailed review of claims (109 Laramie, 1102 Bingham, 7701 Essex) (2.0); detailed review of claim (6356 California) (.6).
			Claims Administration & Objections
8/14/2023	KMP	0.7	Communications with K. Duff and J. Wine regarding subpoena issued in connection with Group 2 claims and research potential new address for subpoenaed party (1700 Juneway, 6949 Merrill) (.3); confer with A. Watychowicz regarding issues relating to paper copies for appellee's brief, notice to court of availability of M. Rachlis for oral argument, and review related rules (Group 1) (.4).
			Claims Administration & Objections
8/14/2023	MR	0.2	Attention to clerk's acceptance for filing of appellate brief and order on oral arguments (Group 1).
			Claims Administration & Objections
8/15/2023	AW	0.9	Email claimant regarding received correspondence and follow up questions (8100 Essex) (.1); follow up with M. Rachlis regarding letter of availability for oral argument and submit same to the clerk (Group 1) (.3); review claim and communications with J. Wine regarding update to master claims list and database (1700 Juneway, 816 Marquette) (.4); communicate with K. Pritchard regarding additional discovery (Group 2) (.1).
			Claims Administration & Objections
8/15/2023	JRW	6	Exchange correspondence with K. Duff regarding claim issue (defer) (.1); exchange correspondence with claimants' counsel and related work with K. Pritchard regarding status of subpoenas (Group 2) (.2); detailed review of claims against properties (3723 W 68th, 4494 Roscoe, 4750 Indiana, 6356 California) (3.8); confer with A. Watychowicz regarding adding claim to Group 2 proceedings (1700 Juneway) (.1); confer with J. Rak regarding claim review (SSDF4) (.1); detailed review of claims against properties (11117 Longwood, 400 Kilbourn, 4317 Michigan, 6217 Dorchester, 7201 Dorchester, 8107 Ellis, 816 Marquette) (1.7).
			Claims Administration & Objections
8/15/2023	KMP	0.9	Prepare chart providing status of responses to Group 2 subpoenas and requests for production and related communication with J. Wine and A. Watychowicz (Group 2).
			Claims Administration & Objections
8/15/2023	MR	0.1	Further attention to briefing and oral argument (Group 1).
			Claims Administration & Objections



Date	Indiv	Hours	Description
8/16/2023	AW	1.3	Review additional production spreadsheet and related email exchanges and follow up calls with J. Wine and K. Pritchard (Group 2) (.3); work on access to document production and related email exchange with counsel for non-party (Group 2) (.3); research and attempt to communicate with non-party regarding response to subpoena (Group 2) (.2); review claim and related revision to master claims sheet and follow up with J. Wine (7026 Cornell) (.3); review duplicate claim and email J. Wine regarding proposed solution (7834 Ellis) (.2).
			Claims Administration & Objections
8/16/2023	JRW	4.9	Work with K. Prichard and A. Watychowicz regarding additional discovery responses and productions (Group 2) (.4); confer with M. Rachlis regarding subpoenaed party and factual research regarding same (1700 Juneway, 6949 Merrill) (.3); confer with A. Watychowicz regarding document productions (1700 Juneway, 5450 Indiana, 6160 MLK, 7749 Yates) (.2); confer with M. Rachlis regarding discussions with counsel for subpoenaed party (Group 2) (.1); exchange correspondence with subpoenaed party regarding service of subpoena (1700 Juneway, 6949 Merrill) (.3); detailed review of claims (109 Laramie, 11117 Longwood, 400 Kilbourn, 4930 Cornelia, 6160 MLK, 6437 Kenwood, 7026 Cornell, 7107 Bennett, 7600 Kingston, 8000 Justine, 8107 Ellis, SSDF4) (1.9); detailed review of claims (109 Laramie, 6355 Talman, 7201 Constance, 7255 Euclid, 7600 Kingston, 7834 Ellis, 8107 Ellis, SSDF4) (1.7).
			Claims Administration & Objections
8/16/2023	KMP	0.4	Revise chart providing status of responses to Group 2 subpoenas and requests for production and related communication with M. Rachlis, J. Wine and A. Watychowicz (Group 2).
			Claims Administration & Objections
8/16/2023	MR	0.4	Attention to emails regarding discovery and subpoena (1700 Juneway, 6949 Merrill) (.3); attention to subpoena (Group 2) (.1).
			Claims Administration & Objections
8/17/2023	AW	1.4	Attention to document production, review to compare to prior production from non-party and related email to J. Wine (5450 Indiana, 6160 MLK, 7749 Yates) (.4); research and email J. Wine draft letter regarding lack of response to subpoena (1700 Juneway) (.2); review database settings and communicate with J. Wine regarding default population of filed claims (set68) (.2); draft email response to claimant and related follow up with J. Wine (1700 Juneway, 816 Marquette) (.3); call to non-party regarding response to subpoena and related email to J. Wine (1700 Juneway) (.1); attention to email from claimant and update claim (7051 Bennett) (.2).
			Claims Administration & Objections
8/17/2023	JR	1.5	Continue working on claims, review claims submissions for properties (Hybrid Capital Fund LLC).
			Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
8/17/2023	JRW	5.1	Continued review of claims against properties and related communications with A. Watychowicz and vendor regarding claimant names (109 Laramie, 6355 Talman, 7201 Constance, 7255 Euclid, 7600 Kingston, 7834 Ellis, 8107 Ellis, SSDF4) (1.4); review and revise draft response to claimant inquiry and related communications with A. Watychowicz (1700 Juneway, 4611 Drexel, 816 Marquette) (.4); detailed review of multiple claims (7953 Marquette, 8107 Ellis, SSDF4) (3.2); correspondence to vendor regarding addition of claim (SSDF4) (.1).
			Claims Administration & Objections
8/17/2023	KMP	0.2	Confer with A. Watychowicz regarding issues relating to status of responses to Group 2 subpoenas and requests for production (Group 2).
			Claims Administration & Objections
8/18/2023	AW	0.4	Attention to discovery responses received from non-party and related email to J. Wine (6949 Merrill) (.2); review claims and related communication with J. Wine (1700 Juneway, 816 Marquette) (.2).
			Claims Administration & Objections
8/18/2023	JR	0.8	Continue working on claims, review claims submissions for properties (1414 E 62nd, 5001 Drexel, 5450 Indiana, 6217 Dorchester, 7300 Lawrence).
			Claims Administration & Objections
8/18/2023	JRW	0.5	Telephone conference and correspondence with A. Watychowicz regarding email to claimants (Group 2) (.2); exchange correspondence with K. Pritchard regarding subpoena and draft correspondence to subpoenaed party regarding same (1700 Juneway) (.3).
			Claims Administration & Objections
8/18/2023	KMP	0.1	Communicate with J. Wine regarding delivery confirmation for Group 2 subpoena (Group 2).
			Claims Administration & Objections
8/18/2023	MR	0.3	Follow up regarding outstanding subpoenas (Group 2).
			Claims Administration & Objections
8/21/2023	AW	4.4	Continue updates to contact information based on responses to standard discovery and related email exchanges with J. Rak (Group 2) (.6); review database and communicate with J. Wine regarding duplicate claims numbers (1700 Juneway, 5450 Indiana, 7237 Bennett, 7508 Essex, 7750 Muskegon, 8100 Essex) (.4); communicate with database administrator regarding claims (1700 Juneway, 5450 Indiana, 7237 Bennett, 7508 Essex, 7600 Kingston, 7750 Muskegon, 8100 Essex) (.3); detailed review of claims and notes regarding same (6217 Dorchester, 6355 Talman, 7051 Bennett, 7107 Bennett) (1.4); detailed review of claims and communications with J. Wine regarding pre rollover distributions (6558 Vernon, 7600 Kingston, 7953 Marquette, 8326 Ellis) (1.7).
			Claims Administration & Objections

Date	Indiv	Hours	Description
8/21/2023	JR	1.9	Review email from A. Watychowicz requesting information relating to Group 2 discovery (1700 Juneway, 5450 Indiana, 6160 MLK, 6949 Merrill) (.1); continue working on claims, review claims submissions for properties (1700 Juneway, 4611 Drexel, 638 Avers, 816 Marquette, SSDF4) (1.8). Claims Administration & Objections
8/21/2023	JRW	3.5	Exchange correspondence and attend meeting with claimants' counsel and M. Rachlis regarding potential resolution of claims (1131 E 79th, 7024 Paxton) (.5); review recently added claim (SSDF4) (.3); telephone conferences with K. Duff and M. Rachlis regarding settlement discussions and prepare notes regarding same (1131 E 79th, 7024 Paxton) (1.2); study and combine claim review notes and further review claims (11117 Longwood, 6160 MLK, 7026 Cornell, 7107 Bennett, 7600 Kingston, 8000 Justine, 8107 Ellis, SSDF4) (1.5). Claims Administration & Objections
8/21/2023	MR	1.5	Attention to appeal issues, prepare for related conferences with J. Wine and K. Duff and participate in meeting (1131 E 79th, 7024 Paxton). Claims Administration & Objections
8/22/2023	AW	3	Detailed review of claims, notes regarding same, and related communications with J. Wine (3074 Cheltenham, 6250 Mozart, 6356 California, 7750 Muskegon, 8100 Essex) (2.7); communicate with J. Wine regarding standard and additional discovery responses (Group 2) (.2); draft email to Group 2 regarding potential new claimant (Group 2) (.1). Claims Administration & Objections
8/22/2023	JRW	2.8	Confer with A. Watychowicz regarding claims and related review of same (6558 Vernon, 7200 Stony Island, 7600 Kingston, 7953 Marquette, 8326 Ellis) (.7); attention to document productions pursuant to subpoenas and additional discovery requests and related correspondence with K. Duff, M. Rachlis and E. Duff (Group 2) (1.0); telephone conference with subpoenaed party regarding potential spoliation of records (1700 Juneway, 6949 Merrill) (.1); confer with A. Watychowicz regarding communications to Group 2 claimants and revise correspondence (Group 2) (.3); review claims against property and confer with J. Rak regarding same (4520 Drexel, SSDF1) (.5); confer with J. Rak regarding Group 2 claims review (Group 2) (.2). Claims Administration & Objections
8/22/2023	MR	0.7	Attention to claims related filings (1131 E 79th, 7024 Paxton) (.2); attention to discovery received pursuant to supplemental requests (Group 2) (.5). Claims Administration & Objections
8/23/2023	JR	1.8	Continue working on claims, review claims submissions for properties (8326 Ellis, 7749 Yates, SSDF1). Claims Administration & Objections

Date	Indiv	Hours	Description
8/23/2023	JRW	2.8	Confer with J. Rak regarding claims (4317 Michigan, 6355 Talman) (.2); detailed review of claim against property (4109 Kimball) (.4); review appeal documents (1131 E 79th, 7024 Paxton) (.1); attention to reviewing discovery responses and documents and related updating of chart (Group 2) (1.2); draft correspondence to subpoenaed party (1700 Juneway) (.2); review notes regarding production document and related exchange of correspondence with E. Duff (1700 Juneway) (.7).
			Claims Administration & Objections
8/23/2023	MR	0.3	Further attention to discovery (Group 2) (.2); attention to court order regarding party's failure to submit brief (Group 1) (.1).
			Claims Administration & Objections
8/24/2023	AW	3	Finalize correspondence and email title company served subpoena and related communications with S. Zjalic (1700 Juneway) (.3); further update to spreadsheet reflecting received discovery and related communications with J. Wine (Group 2) (.2); attention to discovery responses received from claimants and related email to J. Wine (Group 2) (.8); attention to emails with documents received from title company and communicate with J. Wine regarding potential issue (1700 Juneway) (.5); communicate with title company regarding received documents (1700 Juneway) (.2); review emails and follow up with J. Wine regarding supplemental production from claimant (5450 Indiana, 7749 Yates) (.2); communicate with J. Wine regarding and continue review of data from vendor to determine if rollovers were recorded (Group 2) (.8).
			Claims Administration & Objections
8/24/2023	ED	0.3	Telephone conference with J. Wine regarding continuing review of discovery documents (Group 2).
			Claims Administration & Objections
8/24/2023	JRW	5.9	Telephone conferences with counsel for title company regarding subpoena and related conference with A. Watychowicz regarding production (1700 Juneway) (.3); confer with A. Watychowicz regarding update to claimants (Group 2) (.1); telephone conferences with J. Rak regarding claims review issues and adding claims (6160 MLK, 7953 Marquette) (.5); review claims against property (7024 Paxton) (.1); confer with E. Duff regarding document review (Group 2) (.3); communicate with A. Watychowicz regarding productions and related review of same (Group 2) (.4); detailed review of claims against property (7051 Bennett) (2.2); confer with A. Watychowicz regarding review of proof of claim data (set68) (.1); exchange correspondence with claimants' counsel regarding meet and confer (5450 Indiana, 7749 Yates) (.1); study claims and review notes and related correspondence to claims vendor regarding addition of claims (6160 MLK, 7953 Marquette) (.6); detailed review of claims and update records (7508 Essex, 8100 Essex, SSDF4) (.7); confer with M. Rachlis regarding discovery status and planning and follow up email regarding same (Group 2) (.5)
			Claims Administration & Objections
8/24/2023	MR	1	Attention to issues on discovery and related conferences with J. Wine (Group 2).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
8/24/2023	SZ	0.3	Prepared and mailed correspondence related to subpoena (1700 Juneway).
			Claims Administration & Objections
8/25/2023	AW	0.2	Attention to show cause response and related email to counsel (Group 1) (.1); attention to notices from the Court regarding jurisdiction issues and related communications with counsel (Group 1) (.1).
			Claims Administration & Objections
8/25/2023	JR	1.3	Review and prepare property claim sheets in preparation for data transfer and update claims with additional distribution recommendations, related communication with J. Wine (4108 Monticello, 4351 Calumet, 7834 Ellis).
			Claims Administration & Objections
8/25/2023	JRW	2.1	Study claims and confer with J. Rak regarding claims analysis and related preparation of worksheet (4108 Monticello, 7844 Ellis) (.4); review claims against property (7546 Saginaw) (.3); review SEC response to rule to show cause (Group 1) (.1); review appellate docket and filings (1131 E 79th, 7024 Paxton) (.2); review appellate court order regarding amended jurisdictional statement and related correspondence with claimants counsel and M. Rachlis (Group 1) (.2); confer with J. Rak regarding claim (4351 Calumet) (.2); detailed review of claims and related correspondence with A. Watychowicz (4108 Monticello, 7508 Essex, 7844 Ellis, 8100 Essex, SSDF4, SSDF6) (.7).
			Claims Administration & Objections
8/25/2023	MR	0.5	Attention to various orders on scheduling and filing and exchanges on issues moving forward (1131 E 79th, 7024 Paxton) (.2); attention to submission regarding appeal (Group 1) (.1); attention to orders on supplemental briefs on jurisdictional issues and related follow up (Group 1) (.2).
			Claims Administration & Objections
8/28/2023	AW	3.6	Attention to email from claimant regarding receiver's recommendation and related communications with counsel (Group 3) (.1); review claims and related communications with J. Wine and J. Rak (5450 Indiana, 6160 KLM, 7749 Yates, SSDF1) (.8); review claims and communicate with J. Wine regarding additional claims (7508 Essex, 8100 Essex, SSDF4) (1.1); attention to email from J. Rak regarding claim review, review same and detailed email to J. Rak and J. Wine (4611 Drexel, 638 Avers, 7600 Kingston, 7748 Essex, SSDF4) (1.1); start review of buyouts spreadsheet (Group 2) (.4); draft correspondence to claimant regarding claims process (Group 3) (.1).
			Claims Administration & Objections
8/28/2023	JR	1.3	Review correspondence and communicate with J. Wine and A. Watychowicz regarding property claim, conduct further research regarding same (6160 MLK) (.7); conduct research relating to claim and correspond with A. Watychowicz regarding same (7600 Kingston, SSDF4) (.6)

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
8/28/2023	JRW	3.9	Exchange correspondence with A. Watychowicz and J. Rak regarding claims review and possible addition of claim , and related review of proof of claim submission (6160 MLK) (.6); communicate with A. Watychowicz regarding addition of claims (7508 Essex, 8100 Essex, SSDF4) (.1); exchange correspondence with J. Rak and A. Watychowicz regarding claim (SSDF4) (.2); review claim against property and related communications with J. Rak (5201 Washington) (.2); review discovery from claimant (5450 Indiana, 7749 Yates) (1.1); conferences with A. Watychowicz regarding claim review issues (set56) (.2); meet and confer with counsel for claimants regarding document productions (5450 Indiana, 7749 Yates) (.2); review and revise draft correspondence to claimants (1700 Juneway, 6160 MLK, 7109 Calumet, 7953 Marquette) (.4); review submission in class action and related analysis to K. Duff and M. Rachlis (defer) (.2); conduct database searches regarding transfers of account and related correspondence to A. Watychowicz (7508 Essex, 8100 Essex, SSDF4) (.6); exchange correspondence with class counsel regarding information from claims administrator (defer) (.1).
			Claims Administration & Objections
8/28/2023	MR	2.4	Work on review of discovery responses and documents (1700 Juneway) (2.2); attention to appellate brief (Group 1) (.2).
			Claims Administration & Objections
8/29/2023	AW	2.4	Attention to emails from claimants and related updates to contact information (1131 E 79th, 3074 Cheltenham, 6217 Dorchester, 6437 Kenwood, 7237 Bennett, 7749 Yates, 7927 Essex, Group 3, SSDF2) (.3); communicate with class action counsel regarding claimants' updated contact information (defer) (.1); draft amended jurisdictional statement and related email to M. Rachlis (Group 1) (.3); attention to entered order regarding Group 3 distribution and communicate with counsel regarding update for claimants (Group 3) (.2); research database and related email to M. Rachlis (1700 Juneway) (.4); follow up with J. Rak regarding claims review process (set68) (.1); review claims and proposed emails to claimants, related exchange with J. Wine, and email claimants (1700 Juneway, 6160 MLK, 7953 Marquette, 816 Marquette) (.7); attention to documents from claimant and related communications with J. Wine (7834 Ellis) (.2); communicate with J. Wine regarding proposed response to claimant (Group 3) (.1).
			Claims Administration & Objections
8/29/2023	ED	1.8	Review of additional discovery documents (1700 Juneway).
			Claims Administration & Objections
8/29/2023	JR	1.8	Further analyze and review a rolled over claim submitted by claimant (4351 Calumet, 4528 Michigan, 5450 Indiana, 4611 Drexel).
			Claims Administration & Objections

Date	Indiv	Hours	Description
8/29/2023	JRW	2.3	Revise claim worksheet and related communications (7834 Ellis) (.2); review document production from title company (5450 Indiana, 7749 Yates) (1.2); confer with A. Watychowicz regarding claimant updates (defer) (.1); attention to claimant inquiry (Group 3) (.1); attention to claimant inquiry regarding funds held by receiver (set68) (.1); attention to claimant discovery (7834 Ellis) (.1); exchange correspondence with E. Duff regarding claimants' discovery responses (Group 2) (.2); review and revise amended jurisdictional statement and related correspondence with M. Rachlis and K. Duff (Group 1) (.3).
			Claims Administration & Objections
8/29/2023	MR	4.3	Continue review of discovery from title insurer and other materials (1700 Juneway) (3.0); review and research regarding amended jurisdictional statement and related exchanges with K. Duff and J. Wine. (Group 1) (.8); attention to appellate filings (1131 E 79th, 7024 Paxton) (.5).
			Claims Administration & Objections
8/30/2023	AW	2.9	Email claimant regarding received documents and claims process (7834 Ellis) (.1); email claimant regarding Receivership funds (Group 3) (.1); communicate with J. Wine regarding future groups (set68) (.1); process and provide supplemental productions to E. Duff (6160 MLK, 6949 Merrill) (.5); research concerning and communicate with counsel regarding claimants' responses to standard discovery (1700 Juneway) (.5); communicate with J. Wine regarding additional claims (7508 Essex, 8100 Essex, SSDF4) (.2); further review of claims documents, update claims list to differentiate claims with the same claims number, and communicate with J. Wine regarding same (7508 Essex, 7600 Kingston, 8100 Essex, SSDF4) (.8); final revisions to amended jurisdictional statement, finalize same, and file with the Court (Group 1) (.5); finalize draft email to claimant (Group 3) (.1).
			Claims Administration & Objections
8/30/2023	JR	2	Review emails from J. Wine and E. Duff requesting specific responses to discovery responses, conduct a search and provide same (1700 Juneway, 5450 Indiana, 6160 MLK, 7749 Yates) (.4); further review claim submitted by claimant, related communication with J. Wine and A. Watychowicz (4528 Michigan, 4611 Drexel) (.8); claim analysis for claimant (4520 Drexel, 4611 Drexel, 6217 Dorchester, 701 S 5th) (.8).
			Claims Administration & Objections
8/30/2023	JRW	1.3	Work with J. Rak and A. Watychowicz on various claim review issues (4528 Michigan, 7508 Essex, 7600 Kingston, 7748 Essex, 8100 Essex, SSDF4) (.3); correspondence with E. Duff, J. Rak and A. Watychowicz regarding claimants' discovery responses (Group 2) (.1); review draft amended jurisdictional statement, review claimants' amended jurisdictional statement, and related communications (Group 1) (.1); continued review of title company document production (5450 Indiana, 7749 Yates) (.8).
			Claims Administration & Objections
8/30/2023	MR	1.7	Continue work on review of production (1700 Juneway) (1.5); additional follow up regarding research submission (Group 1) (.2).

Date	Indiv	Hours	Description
			Claims Administration & Objections
8/31/2023	AW	3.4	Communications with claimant and Receiver's counsel regarding Receivership funds , upcoming hearing, and potential participation (Group 3) (.3); communicate with J. Wine regarding and access the data provided by class action counsel (defer) (.3); research database and related communications with M. Rachlis regarding results and saved searches (1700 Juneway) (.8); review buyouts spreadsheet and confirm claims were captured (Group 2) (1.8); communicate with J. Wine regarding claims review database (set68) (.1); communicate with claims vendor regarding new claim (7748 Essex) (.1).
			Claims Administration & Objections
8/31/2023	JR	2.5	Continue working on claims, review claims submissions for properties (4520 Drexel, 4611 Drexel, 6217 Dorchester, 701 S 5th, SSDF1).
			Claims Administration & Objections
8/31/2023	JRW	4.2	Confer with A. Watychowicz regarding transfer of documents from claims administrator in class action (defer) (.1); study spreadsheets and folders and related correspondence to class action claims administrator (defer) (.8); review claim against property and related email to A. Watychowicz (1700 Juneway, 6160 MLK, 7749 Yates) (.1); additional communication regarding claimant inquiry (defer) (.1); continue reviewing document production from title company (5450 Indiana, 7749 Yates) (.5); study bank records and claims issue and related analysis to K. Duff (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 Ellis) (1.5); attention to detailed review of claims (4533 Calumet, 7508 Essex) (.7); detailed review of claim (7107 Bennett) (.4).
			Claims Administration & Objections
8/31/2023	MR	4.8	Research and review title insurer documents regarding claim validity (1700 Juneway).
			Claims Administration & Objections

SUBTOTAL: [ 200.2      46,011.00 ]

Distributions

8/29/2023	AW	0.2	Email claimants order approving distribution and related conditions (Group 3). Distributions
8/29/2023	JRW	0.3	Review court order, related communications with A. Watychowicz and K. Duff regarding distributions, and revise claimant communication (Group 3). Distributions



<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
8/29/2023	MR	0.2	Attention to Group 3 ruling and communications to claimants regarding same (Group 3). Distributions

SUBTOTAL: [ 0.7      184.00 ]

Status Reports

8/2/2023	AW	0.1	Communicate with J. Wine regarding updates to next status report. Status Reports
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SUBTOTAL: [ 0.1      14.00 ]

Tax Issues

8/18/2023	KMP	0.2	Communicate with tax administrator regarding balances for property accounts for 2Q2023, in connection with preparation of tax reports. Tax Issues
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SUBTOTAL: [ 0.2      28.00 ]

273.5      \$58,747.00

Other Charges	Description	
	Google Suite for August 2023	144.00
	FedEx charges for delivery of checks for endorsement to Receiver	41.52
	Litigation support vendors - preparation and delivery of paper copies of appellee's brief for 7th Circuit appeal	164.45
	Online research for August 2023	506.54
		856.51
SUBTOTAL:		[ 856.51 ]
		856.51
Total Other Charges		\$856.51

Summary of Activity			
	Hours	Rate	
Duff, Ellen	2.10	390.00	\$819.00
Pritchard, Kathleen M.	8.40	140.00	\$1,176.00
Rachlis, Michael	35.70	390.00	\$13,923.00
Rak, Justyna	90.40	140.00	\$12,656.00
Watychowicz, Ania	44.80	140.00	\$6,272.00
Wine, Jodi Rosen	91.80	260.00	\$23,868.00
Stoja Zjalic	0.30	110.00	\$33.00

**SUMMARY**

Legal Services	\$58,747.00
Other Charges	\$856.51
<b>TOTAL DUE</b>	<hr/> <b>\$59,603.51</b> <hr/> <hr/>

## Rachlis Duff & Peel, LLC

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CHICAGO, ILLINOIS 60605

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October 23, 2023

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. 6622163

Legal Fees for September 2023	\$38,172.00
Expenses Disbursed	\$144.00
<b>Due this Invoice</b>	<b>\$38,316.00</b>

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>		
<u>Accounting/Auditing</u>					
9/7/2023	KMP	0.3	Review account information on banking portal and related communications with K. Duff, J. Wine, and A. Watychowicz. Accounting/Auditing		
9/8/2023	KMP	1.4	Reconcile and update ledgers for Receiver's accounts and prepare schedules of receipts and disbursements for July and August 2023. Accounting/Auditing		
SUBTOTAL:				[ 1.7	238.00 ]
<u>Asset Analysis &amp; Recovery</u>					
9/15/2023	MR	0.5	Attention to various issues on potential third party claims. Asset Analysis & Recovery		
SUBTOTAL:				[ 0.5	195.00 ]
<u>Business Operations</u>					
9/27/2023	AW	0.1	Communicate with property manager regarding received funds (defer). Business Operations		
9/28/2023	AW	0.1	Follow up with property manager regarding received funds (defer). Business Operations		
9/29/2023	AW	0.1	Email property management regarding check (defer). Business Operations		
9/29/2023	KMP	0.2	Review records and communicate with K. Duff and A. Watychowicz regarding former property manager's transmittal of refund check for property (defer). Business Operations		
SUBTOTAL:				[ 0.5	70.00 ]
<u>Case Administration</u>					
9/1/2023	JRW	0.4	Exchange correspondence with class administrator regarding claimant addresses (.2); confer with claims vendor regarding claimant name (.1); attention to claimant request and related voice message to courtroom deputy (.1). Case Administration		
9/5/2023	JRW	0.1	Exchange correspondence with courtroom deputy and A. Watychowicz regarding claimants' request to appear at hearing. Case Administration		

Date	Indiv	Hours	Description
9/6/2023	AW	0.3	Communicate with counsel regarding hearing (.1); communicate with claimant and J. Wine regarding upcoming hearing (.2). Case Administration
9/6/2023	JRW	3	Exchange correspondence with courtroom deputy regarding claimant's request for remote attendance at hearing, and revise draft correspondence to claimant (.1); correspondence with claims vendor regarding status of portal items (.1); study import test results, prepare spreadsheet, and related analysis to vendor (2.8). Case Administration
9/7/2023	AW	0.1	Participate in call regarding database. Case Administration
9/7/2023	JRW	0.7	Exchange correspondence, prepare for meeting, confer with A. Watychowicz, and conference with claims vendor regarding test import to claims portal and other outstanding issues. Case Administration
9/8/2023	JRW	0.2	Confer with J. Rak and A. Watychowicz regarding tracking of new claims and split claims in portal (.1); exchange correspondence with claims vendor regarding update to portal (.1). Case Administration
9/11/2023	AW	0.3	Exchanges with J. Wine and Judge's clerk regarding claimant and confirm claimant participation in hearing . Case Administration
9/11/2023	JRW	0.2	Exchange correspondence with claims vendor regarding status of various projects related to portal (.1); exchange correspondence with courtroom deputy regarding claimant request to speak at hearing (.1). Case Administration
9/12/2023	AW	1.4	Attend telephonic hearing before Judge Shah for communications purposes (1.2); attention to entered orders, related email to counsel and docket update (.2). Case Administration
9/12/2023	JRW	0.7	Confer with A. Watychowicz regarding text messages, conduct searches, and related conference with database vendor (.5); exchange correspondence with A. Watychowicz regarding claimant request to address court (.2). Case Administration
9/14/2023	JRW	2.1	Meeting with claims vendor and K. Duff regarding update on portal issues (.4); follow up with K. Duff regarding portal (.1); exchange correspondence with J. Rak regarding review of added and split claims added to portal and related review of emails and spreadsheets regarding same (1.2); correspondence with claims vendor regarding sample distribution report and spreadsheet for test import to production environment (.2); exchange correspondence and review spreadsheet from class action administrator regarding updated claimant contact information (.2). Case Administration

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
9/15/2023	JR	2.8	Review email from J. Wine regarding review of claims that have recently been updated and split in the portal, and location of claim submission review, portal or EBF property sheet, review and confirm same.  Case Administration
9/18/2023	JR	2.9	Review and confirm claims that have recently been added to the portal, confirm review of claim submission on portal or EBF property sheet (1.7); review email from J. Wine and bank representative regarding claim , confirm accuracy of claim submission for property , further communication with J. Wine (.3); communication with J. Wine relating to review of claim submission, update multiple accounts related to claim submission for claimant , update database records (.9).  Case Administration
9/18/2023	JRW	0.7	Locate and update claim review notes .  Case Administration
9/19/2023	AW	0.2	Attention to change of custodian files and update claim .  Case Administration
9/20/2023	AW	0.8	Prepare update to receivership webpage and related email to IT vendor (.7); communicate with claimant regarding requirement to change custodian (.1).  Case Administration
9/20/2023	JRW	0.6	Exchange correspondence with claims vendor regarding duplicate claims and claimant names (.2); conference with A. Watychowicz regarding EquityBuild records and document productions (.4).  Case Administration
9/21/2023	AW	1.1	Communicate with J. Wine regarding uploads to database and work to upload documents for access .  Case Administration
9/21/2023	JR	1	Exchange communication with J. Wine regarding verification of import of property sheet to portal, review same (.8); further communication with bank representative regarding status of importing property claims and next steps relating to the remainder of the property claims (.2).  Case Administration
9/21/2023	JRW	0.5	Work with claims vendor and J. Rak regarding database imports and calculations .  Case Administration
9/22/2023	AW	0.2	Reach out to database administrator regarding production upload.  Case Administration
9/22/2023	KMP	0.5	Draft and finalize notice letter to collection agency and related communication with K. Duff (.3); work with S. Zjalic regarding transmittal of notice letter (.2).  Case Administration
9/22/2023	SZ	0.3	Prepare transmittal of the Receiver's notice letter .

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Case Administration
9/25/2023	JRW	0.2	Correspondence to claims vendor regarding uploading distribution information to portal.
			Case Administration
9/26/2023	JR	4	Correspondence with J. Wine and bank representatives related to next steps of importing property spreadsheets into the portal and discussion related to importing information from EquityBuild records into the portal (.7); review split claims before forwarding property sheets to bank representative (1.3); compile property sheets in anticipation of data transfer of claims and forward to bank representative (.2); compile additional property spreadsheets in preparation for importing claims data into the portal (1.8).
			Case Administration
9/26/2023	JRW	2.1	Conference call with claims vendor and J. Rak regarding import of EB data to portal (.7); work with J. Rak regarding preparation of spreadsheets for import into claims review portal (.4); prepare marked-up screenshots of portal fields regarding import of distribution spreadsheets (1.0).
			Case Administration
9/27/2023	JRW	0.4	Exchange correspondence with vendor regarding mortgagee sheet import and potential split claims and related communications with J. Rak (.2); confer with A. Watychowicz regarding claimant contact information updates (.2).
			Case Administration
9/28/2023	JR	5.7	Review and compile property spreadsheets in preparation for importing claims data into the portal, related communication with J. Wine and A. Watychowicz requesting clarification as it relates to claims review.
			Case Administration
9/28/2023	JRW	0.6	Exchange various correspondence with claims vendor regarding spreadsheet import (.2); communications with J. Rak and A. Watychowicz regarding unknown property claims and data import (.4).
			Case Administration
9/29/2023	JR	3.1	Review email from J. Wine regarding review of imported claims data into portal to ensure accuracy, conduct review and further communicate with J. Wine regarding errors as it relates to split claims and incorrect data transfer (1.7); communication with J. Wine and bank representative forwarding all property sheets in anticipation of data transfer (.2); communication with J. Wine as it relates to data import of returns from the lender statement of accounts, import data and track time regarding same, further communication with J. Wine (1.2).
			Case Administration
9/29/2023	JRW	1.5	Various telephone conferences and other communications with J. Rak regarding ingestion of records to claims portal and related revision of claims spreadsheets, review claims and follow-up email to claims vendor .



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

SUBTOTAL: [ 38.7 7,089.00 ]

Claims Administration & Objections

9/1/2023	JR	3.7	Finalize an extensive claim review for claimants' various property claims (4520 Drexel, 5001 Drexel, 4611 Drexel, 6217 Dorchester, 701 S 5th, SSDF1, SSDF4).
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Claims Administration & Objections

9/1/2023	JRW	4.2	Continued review of title company production (5450 Indiana, 7749 Yates) (2.5); telephone conference and follow-up emails with counsel for claimants regarding additional discovery requests and production (5450 Indiana, 7749 Yates) (.2); review production documents from claimant (5450 Indiana, 7749 Yates) (1.2); telephone conference with K. Duff regarding claims analysis and calculations relating to data from third-party (set68) (.3).
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Claims Administration & Objections

9/1/2023	MR	0.2	Further attention to outstanding discovery and issues moving forward for Group 2 (Group 2).
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Claims Administration & Objections

9/5/2023	AW	0.4	Attention to supplemental document production from claimant (5450 Indiana, 7749 Yates) (.2); communicate with J. Wine regarding claimant request (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.2).
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Claims Administration & Objections

9/5/2023	JRW	3.4	Confer with claimants' counsel and A. Watychowicz regarding document production (Group 2) (.1); confer with M. Rachlis regarding Rule 408 discussions (1131 E 79th, 7024 Paxton) (.2); confer with M. Rachlis regarding status and results of document reviews (1700 Juneway, 5450 Indiana, 7749 Yates) (.2); correspondence to counsel regarding Rule 408 discussions (1131 E 79th, 7024 Paxton) (.1); database searching and related review of documents with respect to factual investigation regarding claims (5450 Indiana, 7749 Yates) (2.8).
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Claims Administration & Objections

9/5/2023	MR	0.5	Conference with J. Wine regarding certain discovery on Group 2 and related follow up (1700 Juneway, 5450 Indiana, 7749 Yates) (.3); conference with J. Wine regarding order on appeal and settlement (1139 E 79th, 7024 Paxton) (.2).
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Claims Administration & Objections

9/6/2023	AW	0.1	Draft email to claimant in response voice message (defer).
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Claims Administration & Objections

9/6/2023	ED	0.8	Additional review of documents produced in discovery (1700 Juneway) (.3); prepare summary notes regarding review of discovery documents for discussion with J. Wine and M. Rachlis (1700 Juneway, 6160 MLK) (.5).
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Date	Indiv	Hours	Description
			Claims Administration & Objections
9/6/2023	JRW	0.1	Attention to responding to claimant voicemail regarding class action (defer).
			Claims Administration & Objections
9/6/2023	MR	0.5	Attention to motion to certify (1139 E 79th, 7024 Paxton) (.3); attention to status on discovery and related issues on Group 2 discovery in anticipation of upcoming hearing (Group 2) (.2).
			Claims Administration & Objections
9/8/2023	AW	0.3	Review prior communications with claimant and related communications with J. Wine (7237 Bennett, 7255 Euclid, 8100 Essex).
			Claims Administration & Objections
9/9/2023	JRW	4	Attention to claimant inquiry (7237 Bennett, 7255 Euclid, 8100 Essex) (.1); update claims review spreadsheets (4520 Drexel, SSDF1) (.4); continued database searches and review of records (5450 Indiana, 7749 Yates) (2.9); review title company production (6949 Merrill) (.6).
			Claims Administration & Objections
9/11/2023	AW	0.3	Review claim and respond to claimant's voice message and update on claims process (7237 Bennett, 7255 Euclid, 8100 Essex).
			Claims Administration & Objections
9/11/2023	JR	2.5	Continue extensive review of claims submissions (6217 Dorchester, 7026 Cornell, 7600 Kingston, 8326 Ellis).
			Claims Administration & Objections
9/11/2023	JRW	7.4	Exchange correspondence with M. Rachlis regarding status of discovery (Group 2) (.2); continued review and analysis of documents (5450 Indiana, 7749 Yates) (3.6); review and analyze document production (6949 Merrill) (.7); meeting with K. Duff and M. Rachlis to prepare for upcoming hearing and related issues regarding discovery and claims process (Group 2) (1.3); follow-up research related to claim against property and related correspondence (7749 Yates) (.6); confer with K. Duff and M. Rachlis regarding claims process status and planning (set68) (.4); analyze status of claims review and related correspondence to K. Duff and M. Rachlis (set56) (.2); multiple telephone conferences and email exchanges with counsel for claimants regarding status of discovery responses and related conference with K. Duff (5450 Indiana, 7749 Yates) (.4).
			Claims Administration & Objections
9/11/2023	MR	4.4	Attention to status on Group 2 discovery (Group 2) (.3); further attention to issues on claims review (1700 Juneway) (.7); meeting with J. Wine and K. Duff regarding claims process and discovery (Group 2) (1.3); further review and conferences with K. Duff and J. Wine regarding claims process status and planning (set 68) (.4); conferences with J. Wine and K. Duff on claims review status (set56) (.2); further preparation for upcoming hearing (set 73) (1.5).
			Claims Administration & Objections

Date	Indiv	Hours	Description
9/12/2023	AW	1	Review claim and respond to claimant's voice message and update on claims process (1131 E 79th, 2909 E 78th, 4533 Calumet, 5450 Indiana, 7549 Essex, 8047 Manistee, SSDF4) (.3); review claim and respond to claimant's request for update (2800 E 81st, 7840 Yates) (.2); communications with J. Wine regarding claimant's emails and claim (7749 Yates) (.4); communicate with M. Rachlis regarding claimants' supplemental production (6160 MLK, 6949 Merrill) (.1).
			Claims Administration & Objections
9/12/2023	ED	0.8	Prepare and send summary of disclosure document review and follow up questions to M. Rachlis (1700 Juneway, 6160 MLK).
			Claims Administration & Objections
9/12/2023	JR	5.5	Review emails from M. Rachlis, K. Duff and J. Wine regarding final review of submissions of all claims in Groups 4 and 5, review claim submissions for Group 4 (1102 Bingham, 11117 Longwood, 431 E 42nd, 5955 Sacramento, 6001 Sacramento, 6437 Kenwood, 701 S 5th, 7026 Cornell, 7237 Bennett, 7834 Ellis, 8100 Essex).
			Claims Administration & Objections
9/12/2023	JRW	4.9	Attention to client inquiry (1131 E 79th, 4533 Calumet, SSDF4) (.1); confer with A. Watychowicz regarding claimant (7749 Yates) (.2); prepare for court hearing and related discussion with K. Duff and M. Rachlis (set73) (.8); meet and confer with counsel for claimants and M. Rachlis regarding discovery responses (5450 Indiana, 7749 Yates) (.3); appearance in court for status on claims process (set73) (1.2); conference and correspondence from claimants' counsel regarding claims against property (6949 Merrill) (.1); correspondence to claimant regarding informal discovery and related review of claim (5450 Indiana, 7749 Yates) (.2); review court order and related conference with M. Rachlis (1131 E 79th, 7024 Paxton) (.2); confer with M. Rachlis regarding discovery status and planning and related research (Group 2) (.5); detailed review of claims (SSDF1) (1.3).
			Claims Administration & Objections
9/12/2023	MR	3.8	Additional follow up on review and status on discovery (Group 2) (.3); further prepare for hearing and related meeting with J. Wine and K. Duff (set73) (1.2); meeting with claimant's counsel related to concerns regarding discovery responses (5450 Indiana, 7749 Yates) (.3); attend hearing and related follow up (set73) (1.3); conference with J. Wine regarding upcoming discovery related items and issues for Group 2 moving forward (Group 2) (.5); attention to ruling on motion to certify and related conferences with J. Wine (1131 E 79th, 7024 Paxton) (.2).
			Claims Administration & Objections
9/13/2023	AW	0.6	Communications regarding supplemental production from law firm and work with same (Group 2).
			Claims Administration & Objections

Date	Indiv	Hours	Description
9/13/2023	JRW	0.7	Correspondence regarding document production pursuant to subpoena (Group 2) (.1); exchange correspondence with A. Watychowicz regarding communications with claimant (7749 Yates) (.1); review search terms from claimants' counsel and related correspondence with K. Duff and M. Rachlis (5450 Indiana, 7749 Yates) (.5).
			Claims Administration & Objections
9/13/2023	MR	0.4	Attention to production (Group 2) (.3); attention to issues regarding supplemental discovery and search terms (5450 Indiana, 7749 Yates) (.1).
			Claims Administration & Objections
9/14/2023	AW	0.2	Attention to spreadsheets received from class action counsel and related email to J. Wine (defer).
			Claims Administration & Objections
9/14/2023	JR	5.3	Finalize claim submission review for properties (1102 Bingham) (5.2); communication with J. Wine regarding claim review (1102 Bingham) (.1).
			Claims Administration & Objections
9/14/2023	JRW	1.3	Review claim and related communications with J. Rak (1102 Bingham) (.2); confer with J. Rak regarding claims review procedures (set56) (.2); telephone conference with claimant regarding informal discovery request (5450 Indiana, 7749 Yates) (.1); detailed review of claims (7748 Essex, 8326 Ellis) (.8).
			Claims Administration & Objections
9/14/2023	MR	0.2	Attention to production pursuant to subpoena and logistical issues (Group 2).
			Claims Administration & Objections
9/15/2023	JR	0.7	Finalize claim submission review (1102 Bingham).
			Claims Administration & Objections
9/15/2023	JRW	2.3	Review outlines regarding discovery and document productions (Group 2) (.5); detailed review of claims against property (7748 Essex) (.5); conference with K. Duff and M. Rachlis regarding Group 2 strategy and planning (Group 2) (.5); conference with counsel for SEC, K. Duff and M. Rachlis (Group 2) (.7); exchange correspondence with counsel for claimants following up on discovery meet and confer (5450 Indiana, 7749 Yates) (.1).
			Claims Administration & Objections
9/15/2023	MR	2	Prepare for meeting and related conferences with K. Duff and J. Wine (Group 2) (.8); meeting with SEC, K. Duff and J. Wine (Group 2) (.7); attention to emails regarding production and related logistical issues (Group 2) (.2); attention to reply brief (Group 1) (.3).
			Claims Administration & Objections
9/18/2023	JR	1.3	Review correspondence from J. Wine requesting further review and updates to claimant's portal as it relates to complex claims submissions (4611 Drexel, 638 Avers, 7600 Kingston, 7748 Essex, SSDF4).

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
			Claims Administration & Objections
9/18/2023	JRW	1.8	Continued review of title company production (5450 Indiana, 7749 Yates) (.6); confer with claimant regarding informal discovery (7749 Yates) (.1); telephone conference with claimants' counsel regarding Group 2 proceedings (Group 2) (.3); work with J. Rak regarding analysis of claims (6160 MLK) (.4); prepare summary of discussion with claimants' counsel for K. Duff and M. Rachlis (Group 2) (.1); prepare factual record and related correspondence (5450 Indiana, 7749 Yates) (.2); exchange correspondence with claims vendor regarding split and corrected claims (6160 MLK) (.1).
			Claims Administration & Objections
9/19/2023	AW	0.3	Communicate with claimants regarding approved groupings of properties and recent hearing before Judge Shah (2909 E 78th, 6217 Dorchester, 7549 Essex, 8047 Manistee).
			Claims Administration & Objections
9/19/2023	JR	6.7	Finalize and update records for claim submissions (4520 Drexel, 4611 Drexel, 7600 Kingston, 7748 Essex, SSDF4) (1.5); continue working on claims, extensive review of claim submissions for properties (1131 E 79th, 5001 Drexel, 7300 Lawrence, 8326 Ellis) (5.2).
			Claims Administration & Objections
9/19/2023	JRW	1.6	Review claimant's status report and related communications with K. Duff (1131 E 79th, 7024 Paxton) (.1); telephone conference with claimants' counsel regarding discovery status and planning (Group 2) (.1); continued review of title company documents and draft correspondence to claimants' counsel regarding search terms (5450 Indiana, 7749 Yates) (1.4).
			Claims Administration & Objections
9/19/2023	MR	0.6	Attention to appeal issues and status report and possible motion to dismiss (1139 E 79th, 7024 Paxton) (.4); attention to possible deposition and related discovery (5450 Indiana, 7739 Yates) (.1); attention to various communications regarding Group 2 proceedings and discovery (Group 2) (.1).
			Claims Administration & Objections
9/20/2023	AW	0.6	Confer with counsel regarding discovery issues and planning (5450 Indiana, 7749 Yates) (.1); communicate with counsel about and email claimants regarding revised schedule for Group 2 (Group 2) (.2); communicate with counsel and claimants regarding extended deadlines for Group 2 (Group 2) (.3).
			Claims Administration & Objections
9/20/2023	JR	5.6	Continue working on claims, extensive review of claim submissions for properties (4520 Drexel, 7546 Saginaw, 8326 Ellis, SSDF1, Hybrid Capital Fund LLC) (5.5); communication with J. Wine requesting guidance on review of institutional lender claims submissions, review claim submissions (310 E 50th, 4520 Drexel, 5001 Drexel, 7300 Lawrence) (.1).
			Claims Administration & Objections

Date	Indiv	Hours	Description
9/20/2023	JRW	3.2	Exchange correspondence with claimants' counsel regarding meet and confer (5450 Indiana, 7749 Yates) (.1); review draft correspondence to claimants regarding court order extending deadlines (Group 2) (.1); attention to claimant inquiry (Group 3) (.1); confer with J. Rak regarding claim review procedure (set56) (.2); finish reviewing title company documents (6949 Merrill) (1.8); correspondence to K. Duff and M. Rachlis regarding proposed informal discovery from claimants (6949 Merrill) (.2); conference call with K. Duff and counsel regarding discovery planning (5450 Indiana, 7749 Yates) (.1); factual research and review of emails and related analysis to K. Duff and M. Rachlis (6949 Merrill) (.6). Claims Administration & Objections
9/20/2023	KMP	1.1	Review records for information relating to claimants , and related communications with K. Duff and A. Watychowicz (6949 Merrill). Claims Administration & Objections
9/20/2023	MR	0.1	Attention to communications to Group 2 on discovery (Group 2). Claims Administration & Objections
9/20/2023	SZ	0.1	Email exchange with the Receiver regarding information related to claimants (6949 Merrill). Claims Administration & Objections
9/21/2023	AW	0.8	Research regarding claimant's claim and related communications with K. Pritchard (1700 Juneway, 4317 Michigan, 5001 Drexel, 5955 Sacramento, 6356 California, 6949 Merrill, 7026 Cornell, 7625 East End, 7953 Marquette). Claims Administration & Objections
9/21/2023	JR	3.5	Continue working on claims, extensive review of claim submissions for properties (5201 Washington, 6801 East End, 6217 Dorchester, SSDF4). Claims Administration & Objections
9/21/2023	JRW	2.4	Factual research and review of records (5450 Indiana, 7749 Yates) (.3); detailed review of claim (5450 Indiana) (.5); detailed review of claims (2736 W 64th, 7748 Essex, 8326 Ellis) (.9); meet and confer with claimants' counsel regarding discovery deficiencies (5450 Indiana, 7749 Yates) (.5); review and comment on draft response to status report (1131 E 79th, 7024 Paxton) (.2). Claims Administration & Objections
9/21/2023	KMP	1.6	Further review and search of banking records for information relating to claimants , compile relevant documents, and related communications with K. Duff and A. Watychowicz (6949 Merrill). Claims Administration & Objections
9/21/2023	MR	1.8	Attention to draft response and various related edits and exchanges (1139 E 79th, 7024 Paxton) (1.3); attention to issues regarding issues on claim (6949 Merrill) (.3); further attention to potential deposition (5540 Indiana, 7749 Yates) (.2). Claims Administration & Objections

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
9/22/2023	AW	0.2	Supplemental research regarding claimant's investment and related communications with K. Pritchard (1700 Juneway, 4317 Michigan, 5001 Drexel, 5955 Sacramento, 6356 California, 6949 Merrill, 7026 Cornell, 7625 East End, 7953 Marquette).  Claims Administration & Objections
9/22/2023	JR	6.3	Continue working on claims, extensive review of claim submissions for properties (400 Kilbourn, 5618 MLK, 7255 Euclid, 7442 Calumet, 7508 Essex, 7600 Kingston, 7823 Essex, 816 Marquette, SSDF4).  Claims Administration & Objections
9/22/2023	MR	0.2	Attention to discovery issues (5540 Indiana, 7749 Yates) (.2).  Claims Administration & Objections
9/22/2023	SZ	0.4	Review of records to identify information related to claimants and related communications with the Receiver (6949 Merrill).  Claims Administration & Objections
9/25/2023	AW	0.4	Confirm with J. Wine proposed response to claimant and related email to claimant (4317 Michigan, 6160 MLK, 7834 Ellis, 7748 Essex, 7749 Yates) (.2); draft emails to claimants regarding status of claims process (1700 Juneway, 2909 E 78th, 3030 E 79th, 4611 Drexel, 5955 Sacramento, 6160 MLK, 6250 Mozart, 7237 Bennett, 7625 East End, 7635 East End, 6801 East End, 7301 Stewart, 7500 Eggleston, 7549 Essex, 7834 Ellis, 8326 Ellis, 7927 Essex, 8047 Manistee) (.2).  Claims Administration & Objections
9/25/2023	JR	5.5	Continue working on claims, extensive review of claim submissions for properties (400 Kilbourn, 5618 MLK, 638 Avers, 7107 Bennett, 7508 Essex, SSDF1).  Claims Administration & Objections
9/25/2023	JRW	3	Attention to outstanding discovery issues, related analysis to team, conference with K. Duff, and correspondence to claimants counsel regarding document production and search terms (5450 Indiana, 7749 Yates) (.4); factual research regarding claimant and related communications with K. Duff (6949 Merrill) (1.4); attention to claimant inquiry regarding class action (defer) (.1); attention to claimant inquiry regarding claims process (set73) (.1); detailed review of claims (2763 W 64th) (1.0).  Claims Administration & Objections
9/26/2023	AW	2.7	Respond to claimant email regarding claims process (1700 Juneway, 4611 Drexel, 5955 Sacramento, 6160 MLK, 6250 Mozart, 7237 Bennett, 7625 East End, 7635 East End, 6801 East End, 7834 Ellis, 8326 Ellis) (.2); review claims and detailed notes regarding claims (1131 E 79th, 4533 Calumet, 6217 Dorchester, 7255 Euclid, 7508 Essex) (1.6); research regarding documents and related communications with J. Wine (1700 Juneway, 5450 Indiana) (.7); further research regarding documents (set68) (.2).  Claims Administration & Objections

Date	Indiv	Hours	Description
9/26/2023	JRW	1.9	<p>Telephone conference and additional correspondence with A. Watychowicz regarding EB records search (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 Juneway, 2736 W 64th, 2800 E 81st, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7442 Calumet, 7450 Luella, 7508 Essex, 7546 Saginaw, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7957 Marquette, 8000 Justine, 8100 Essex, 8107 Ellis, 816 Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) (.4); confer with M. Rachlis regarding search terms and related correspondence to claimants' counsel (5450 Indiana, 7749 Yates) (.4); confer with counsel for claimant and SEC regarding potential deposition (5450 Indiana, 7749 Yates) (.2); detailed review of claims against properties (2736 W 64th, 7656 Kingston) (.8); confer with M. Rachlis regarding scheduling (Group 2) (.1).</p> <p>Claims Administration &amp; Objections</p>
9/26/2023	MR	0.5	<p>Conference with J. Wine regarding issues on properties and issues to raise with counsel regarding discovery (5450 Indiana, 7749 Yates) (.4); conference with J. Wine regarding discovery scheduling (Group 2) (.1).</p> <p>Claims Administration &amp; Objections</p>
9/27/2023	AW	1.4	<p>Email claimant regarding order approving distribution and timing (Group 3) (.1); communicate with J. Wine regarding proposed response to claimant and email claimant regarding claims process and recent court hearing (6437 Kenwood, 7749 Yates) (.2); review and communicate with J. Wine regarding returned mail (defer) (.2); extensive review of claim, related notes, and communications with J. Wine (7701 Essex) (.9).</p> <p>Claims Administration &amp; Objections</p>



Date	Indiv	Hours	Description
9/27/2023	JRW	3.6	Attention to claimant inquiries (set68) (.2); work with A. Watychowicz on database searches and process for determination of distributions (1102 Bingham, 11117 Longwood, 1131 E 79th, 1401 W 109th, 1414 E 62nd, 1422 E 68th, 1700 Juneway, 2736 W 64th, 2800 E 81st, 310 E 50th, 431 E 42nd, 4315 Michigan, 4520 Drexel, 4533 Calumet, 4611 Drexel, 4750 Indiana, 5001 Drexel, 5450 Indiana, 5618 MLK, 5955 Sacramento, 6001 Sacramento, 6160 MLK, 6217 Dorchester, 6250 Mozart, 6355 Talman, 6356 California, 638 Avers, 6437 Kenwood, 6554 Vernon, 6807 Indiana, 6949 Merrill, 701 S 5th, 7024 Paxton, 7026 Cornell, 7051 Bennett, 7109 Calumet, 7201 Dorchester, 7237 Bennett, 7255 Euclid, 7300 St Lawrence, 7442 Calumet, 7450 Luella, 7508 Essex, 7546 Saginaw, 7600 Kingston, 7656 Kingston, 7701 Essex, 7748 Essex, 7749 Yates, 7760 Coles, 7834 Ellis, 7840 Yates, 7957 Marquette, 8000 Justine, 8100 Essex, 8107 Ellis, 816 Marquette, 8201 Kingston, 8209 Ellis, 8214 Ingleside, 8326 Ellis) (.5); study claim review notes for properties and related correspondence to claims vendor (5450 Indiana, 7749 Yates) (2.0); exchange correspondence with claimants' counsel regarding document searches (5450 Indiana, 7749 Yates) (.2); review appellate court order and related communications with K. Duff (1131 E 79th, 7024 Paxton) (.1); exchange correspondence with SEC regarding deposition (5450 Indiana, 7749 Yates) (.1); attention to claim review (2736 W 64th) (.5).

Claims Administration & Objections

9/27/2023	MR	0.3	Attention to order and issuance of stay (1131 E 79th, 7024 Paxton) (.1); attention to Group 2 discovery issues (Group 2) (.2).
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Claims Administration & Objections

9/28/2023	AW	1.7	Follow up with claimant regarding extended schedule (6437 Kenwood, 7749 Yates) (.1); email claimants regarding order approving distribution and timing (Group 3) (.2); review claims and detailed notes regarding same (3030 E 79th, 7301 Stewart, 7442 Calumet, 7500 Eggleston, 8326 Ellis) (1.2); review claim and communicate with J. Rak regarding recommendation (defer) (.2).
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Claims Administration & Objections

9/28/2023	ED	1.7	Review files and documents regarding investors' claims regarding property (6949 Merrill) (.4); preparation for meeting with M. Rachlis and J. Wine regarding discovery review and follow-up (1700 Juneway, 6160 MLK, 6949 Merrill) (.2); meeting with M. Rachlis and J. Wine to discuss discovery review and follow-up (1700 Juneway, 6160 MLK) (1.1).
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Claims Administration & Objections

Date	Indiv	Hours	Description
9/28/2023	JRW	4.1	Telephone conference with counsel for claimants and related review of records (6949 Merrill) (.3); attention to response to claimant inquiry (Group 2) (.1); database research regarding underlying EquityBuild transaction (1700 Juneway) (.4); review records regarding claims against property (6949 Merrill) and related correspondence with E. Duff (.2); database research regarding claims against properties (1700 Juneway, 6160 MLK, 6949 Merrill) (1.0); conference with M. Rachlis and E. Duff regarding discovery status and review (1700 Juneway, 6160 MLK) (1.1); detailed review of claims against properties (2736 W 64th, 3915 Kimball, 6558 Vernon, 7442 Calumet) (1.0).
			Claims Administration & Objections
9/28/2023	MR	1.4	Prepare for and participate in meeting with E. Duff and J. Wine regarding discovery (1700 Juneway, 6160 MLK).
			Claims Administration & Objections
9/29/2023	AW	0.5	Email and follow up communications with J. Wine regarding claim (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.3); email K. Duff regarding reviewed claim and recommendation (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.1); communicate with database support regarding addition of claim (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.1).
			Claims Administration & Objections
9/29/2023	JRW	3.8	Telephone conference with A. Watychowicz and further communications with K. Duff regarding claim and potential amendment of distribution plan (3030 E 79th, 7301 Stewart, 7500 Eggleston) (.4); detailed review, database searches, and analysis of claims against properties (1401 W 109th, 8000 S Justine, Colony Investment) (2.1); continued review of claims and summary spreadsheet submitted by claimant (2736 W 64th, 3915 Kimball, 6558 Vernon, 7442 Calumet) (1.3).
			Claims Administration & Objections
9/29/2023	MR	0.1	Attention to claim (3030 E 79th, 7301 Stewart, 7500 Eggleston).
			Claims Administration & Objections

SUBTOTAL: [ 135.3      30,446.00 ]

Distributions

9/5/2023	AW	0.2	Review order approving distribution and related communication with claimant (3074 Cheltenham).
			Distributions
9/11/2023	AW	0.1	Communicate with claimant regarding received voice message and update on order approving distribution (7635 East End).
			Distributions
9/11/2023	JRW	0.2	Confer with K. Duff and M. Rachlis regarding Group 3 distribution and scheduling issues (Group 3).
			Distributions

<u>Date</u>	<u>Indiv</u>	<u>Hours</u>	<u>Description</u>
9/12/2023	AW	0.1	Communicate with claimant regarding approved Receiver's recommendation on Group 3 distribution (3030 E 79th, 7301 Stewart, 7500 Eggleston). Distributions
9/25/2023	JRW	0.1	Attention to inquiry from claimant regarding distributions (Group 3). Distributions

SUBTOTAL:

[ 0.7            134.00 ]

177.4            \$38,172.00

<u>Other Charges</u>	<u>Description</u>		
	Google Suite for September 2023	144.00	
			_____
SUBTOTAL:		[ 144.00 ]	
			_____
Total Other Charges		\$144.00	

<u>Summary of Activity</u>			
	<u>Hours</u>	<u>Rate</u>	
Duff, Ellen	3.30	390.00	\$1,287.00
Pritchard, Kathleen M.	5.10	140.00	\$714.00
Rachlis, Michael	17.50	390.00	\$6,825.00
Rak, Justyna	66.10	140.00	\$9,254.00
Watychowicz, Ania	16.60	140.00	\$2,324.00
Wine, Jodi Rosen	68.00	260.00	\$17,680.00
Stoja Zjalic	0.80	110.00	\$88.00

**SUMMARY**

Legal Services	\$38,172.00
Other Charges	\$144.00
<b>TOTAL DUE</b>	<hr/> <b>\$38,316.00</b> <hr/> <hr/>