

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
CENTRAL DIVISION

In Re:

TELEXFREE, LLC ,  
TELEXFREE, INC.,  
TELEXFREE FINANCIAL, INC.,

Debtors.

Chapter 11

Case No. 14-40987-MSH

Case No. 14-40988-MSH

Case No. 14-40989-MSH

Jointly Administered

SUMMARY COVER SHEET OF FOURTH INTERIM FEE APPLICATION OF  
MURPHY & KING, PROFESSIONAL CORPORATION  
COUNSEL TO CHAPTER 11 TRUSTEE

**Basic Information**

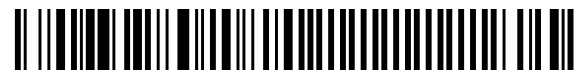
|                                    |   |
|------------------------------------|---|
| Name of Applicant                  | Murphy & King, Professional Corporation |
| Name of Client                     | Stephen B. Darr, Chapter 11 Trustee     |
| Petition Date                      | April 13, 2014                          |
| Date of Order Approving Employment | July 14, 2014                           |

**This Application**

|  |                                      |
|--|--------------------------------------|
| Time Period Covered                                    | March 1, 2017 through March 31, 2018 |
| Total Hours Billed                                     | 1,897.9                              |
| Total Fees Billed                                      | \$1,042,217.50                       |
| Blended Rate   | \$551.25                             |
| Total Fees Requested (after voluntary reductions/caps) | \$1,019,701.50                       |
| Blended Rate (after voluntary reductions/caps)         | \$537.27                             |
| Total Expenses Requested                               | \$25,859.45                          |
| Fees Requested over Budgeted (if any)                  | None                                 |
| Total professionals                                    | 12                                   |
| Total professionals not in staffing plan (if any)      | n/a                                  |
| Total professionals bills <15 hours (if any)           | 2                                    |
| Rate increases not previously approved/disclosed?      | Previously approved                  |
| Total Fees Requested (excluding all rate increases)    | \$906,010.50                         |

**Historical Information**

|  |                |
|--|----------------|
| Fees approved to date by interim order           | \$4,148,907.00 |
| Expenses approved to date by interim order       | \$185,890.69   |
| Allowed Fees paid to date                        | \$4,148,907.00 |
| Allowed Expenses paid to date                    | \$185,890.69   |
| Fees paid per monthly order; not yet allowed     | n/a            |
| Expenses paid per monthly order; not yet allowed | n/a            |



144098718041700000000001

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS**

|                                   |   |                              |
|-----------------------------------|---|------------------------------|
| <b>In Re:</b>                     | ) |                              |
|                                   | ) |                              |
|                                   | ) | <b>Chapter 11</b>            |
|                                   | ) |                              |
| <b>TELEXFREE, LLC,</b>            | ) | <b>Case No. 14-40987-MSH</b> |
| <b>TELEXFREE, INC.,</b>           | ) | <b>Case No. 14-40988-MSH</b> |
| <b>TELEXFREE FINANCIAL, INC.,</b> | ) | <b>Case No. 14-40989-MSH</b> |
|                                   | ) |                              |
| <b>Debtors.</b>                   | ) | <b>Jointly Administered</b>  |
|                                   | ) |                              |

**FOURTH INTERIM APPLICATION FOR COMPENSATION AND  
REIMBURSEMENT OF EXPENSES BY MURPHY & KING, PROFESSIONAL  
CORPORATION, COUNSEL TO STEPHEN B. DARR, CHAPTER 11 TRUSTEE**

To The Honorable Melvin S. Hoffman, Chief United States Bankruptcy Judge:

Murphy & King, Professional Corporation (“M&K”), counsel to Stephen B. Darr, the duly appointed Chapter 11 trustee (the “Trustee”) of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the “Debtors” or “TelexFree”) respectfully submits this Fourth Interim Application for Compensation and Reimbursement of Expenses for the period from March 1, 2017 through March 31, 2018 (“Application”) in accordance with 11 U.S.C. §§328, 330 and 331, Rule 2016 of the Federal Rules of Bankruptcy Procedure, and Massachusetts Local Bankruptcy Rule (“MLBR”) 2016-1. In support of the Application, M&K states as follows:

**PRELIMINARY STATEMENT**

1. The Application has been prepared in accordance with Local Bankruptcy Rule 2016-1. In addition, this Application is consistent with the United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under the United States Code by Attorneys in Larger Chapter 11 Cases (the “Appendix B Guidelines”).

2. M&K has included responses to the requests for information and made the additional disclosures set forth in the Appendix B Guidelines promulgated by the Executive Office for United States Trustees. In doing so, M&K reserves all rights as to the relevance and applicability of the Appendix B Guidelines with respect to the Application.

3. The Application is supported by the following tables, which are appended to the end of the Application:

- (i) Table 1, which contains a summary of M&K timekeepers in the Application and fees billed;<sup>1</sup>
- (ii) Table 2, which contains a summary of expense reimbursements requested by category;<sup>2</sup>
- (iii) Table 3, which contains a disclosure of customary and comparable compensation.<sup>3</sup>

4. Consistent with the Appendix B Guidelines, M&K is providing its billing records to the United States Trustee and the Court in a searchable, electronic format.

### **INTRODUCTION**

5. On April 13, 2014 (the “Petition Date”), each of the Debtors filed voluntary petitions for relief under Chapter 11 of the United States Bankruptcy Code (“Bankruptcy Code”) with the United States Bankruptcy Court for the District of Nevada (the “Nevada Bankruptcy Court”).

6. The Debtors initially operated as debtors-in-possession pursuant to Sections 1107 and 1108 of the Bankruptcy Code.

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<sup>1</sup> Table 1 is patterned on Exhibit B to the Appendix B Guidelines.

<sup>2</sup> Table 2 is patterned on Exhibit D-2 to the Appendix B Guidelines.

<sup>3</sup> Table 3 is patterned on Exhibit A to the Appendix B Guidelines.

7. On the Petition Date, the Debtors filed a motion for joint administration of the cases, with TelexFree, LLC designated as the lead case. By order dated April 24, 2014, the motion for joint administration was approved.

8. On or about May 6, 2014, the Nevada Bankruptcy Court entered an order approving a motion by the Securities and Exchange Commission ("SEC") to change venue, and the cases were transferred to this Court on May 9, 2014.

9. On May 30, 2014, the Court approved the motion of the Office of the United States Trustee to appoint a Chapter 11 trustee, and the Trustee was appointed on June 6, 2014. On June 17, 2014, the Trustee filed an application with the Court to retain M&K as his counsel [docket entry no. 277], which application was approved by order of the Court dated July 14, 2014 [docket entry no. 350].

10. On or about May 5, 2015, M&K filed its First Interim Application for Compensation and Reimbursement of Expenses (the "First Application"), pursuant to which M&K requested approval and payment of interim fees in the amount of \$1,307,858.50 and reimbursement of expenses in the sum of \$36,116.25 for services rendered and expenses incurred during the period from June 6, 2014 through March 31, 2015 (the "First Application Period") [docket entry no. 598]. The First Application was approved by order dated June 10, 2015 [docket entry no. 610] and the amounts requested have since been paid.

11. On or about June 1, 2016, M&K filed its Second Interim Application for Compensation and Reimbursement of Expenses (the "Second Application"), pursuant to which M&K requested approval and payment of interim fees in the amount of \$1,699,935.50 and reimbursement of expenses in the sum of \$54,254.84 for services rendered and expenses incurred during the period from April 1, 2015 through March 31, 2016 (the "Second Application").



Period”)[docket entry no. 598]. The Second Application was approved by order dated July 12, 2016 [docket entry no. 774] and the amounts requested have since been paid.

12. On or about April 11, 2017, M&K filed its Third Interim Application for Compensation and Reimbursement of Expenses (the “Third Application”), pursuant to which M&K requested approval and payment of interim fees in the amount of \$1,141,113.00 and reimbursement of expenses in the sum of \$95,519.60 for services rendered and expenses incurred during the period from April 1, 2016 through February 28, 2017 (the “Third Application Period”)[docket entry no. 598]. The Third Application was approved by order dated May 10, 2017 [docket entry no. 880] and the amounts requested have since been paid.

13. By this Application, M&K requests approval and payment of interim fees in the amount of \$1,019,701.50 and reimbursement of expenses in the sum of \$25,895.49 for services rendered and expenses incurred during the period from March 1, 2017 through March 31, 2018 (the “Application Period”).

### **BACKGROUND**

14. The Debtors ostensibly operated a multi-level marketing enterprise engaged in the sale of voice over internet protocol (“VOIP”) services, but they, in actuality, operated a Ponzi and pyramid scheme involving as many as a million or more participants in multiple countries (hereinafter, parties who became involved in the Debtors’ Ponzi and pyramid scheme shall be referred to as “Participants”). The Debtors, and an affiliated company located in Brazil known as Ympactus Comercial Ltda. (“Ympactus”), together extracted as much as \$1,800,000,000 from Participants located throughout the world over a period of approximately two years. The background of the Debtors and their affiliates is set forth in further detail in the First Application, which is incorporated herein by reference.

**I. The Mechanics of the Scheme and Methods of Compensation**

15. While the Debtors offered to provide a VOIP service for a monthly charge of \$49.90 to conduct international phone calls, the Debtors' primary business was the recruitment of new Participants to generate revenues for the Debtors and payment of existing Participants.

16. Participants could purchase a VOIP plan or one of two membership plans, AdCentral and AdCentral Family, which were priced at \$339 and \$1,425, respectively. Each time that a Participant purchased a plan, the Participant would establish a User Account with TelexFree. As to each plan, Participants received a number of VOIP service packages and were required to place daily internet advertisements. In exchange for the placement of the advertisements, Participants received TelexFree "credits" on a weekly basis.

17. Participants could receive credits based upon bonuses or commissions "earned" during their involvement in the scheme. Bonuses and commissions were principally based upon the recruitment of new Participants into the scheme as part of a Participant's "downline."

18. Participants could also receive credits for commissions arising from the sale of the VOIP service. There was no requirement, however, that Participants actually sell the VOIP service, and VOIP sale revenues were an insignificant portion of the total revenues collected by the Debtors.

19. The TelexFree credits issued to Participants could be redeemed for cash, transferred to another Participant, or applied in satisfaction of an invoice.

20. The Debtors' business plan was complicated in and of itself. The scheme's complexity was expanded further, however, through a web of inter-Participant activity.

21. Participants could purchase membership plans by making payment directly to the Debtors. Transactions whereby Participants paid the Debtors directly to satisfy an invoice for a membership plan or VoIP Package are referred to as "Direct Transactions".

22. In lieu of paying funds directly to the Debtors, it appears that many Participants became involved in the scheme by paying their membership fee or VoIP plan fee directly to a recruiting Participant. In these circumstances, the recruiting Participant often retained the invoice payment from the recruited Participant and satisfied the Debtors' invoice to the recruited Participant by redeeming their accumulated credits (hereinafter referred to as a "Triangular Transactions").

23. There also appears to have been an active secondary market of buying and selling credits between Participants, unrelated to the issuance of a Debtor invoice. In some instances, Participants sold credits "earned" through their involvement in the Ponzi scheme, whether through placement of advertisements or recruitment of new Participants. In other instances, the Debtors issued to Participants "manual credits" ("Manual Credits") that is, credits issued by TelexFree not based upon any aspect of the compensation scheme, which credits were then sold to other Participants. Some of the Manual Credits were issued without consideration and appear to have been a distinct fraud within the broader fraudulent scheme.

## **II. Growth of the Pyramid Scheme and Eventual Collapse**

24. Ympactus, which ran a parallel scheme based in Brazil, initially grew much more rapidly than the Debtors, with growth accelerating in the fall of 2012 through the early summer of 2013. In June 2013, the Brazilian authorities suspended the operations of Ympactus and froze its assets in Brazil based upon allegations that it was a pyramid scheme. On or about September 16, 2015, the Brazilian court entered an order finding Ympactus to have engaged in a pyramid scheme.

25. Although counsel advised the Debtors in mid-2013 that the business plan constituted an unlawful pyramid scheme, the Debtors continued to operate under that plan until March 2014. At that time, the Debtors introduced a new business plan, even though the Debtors

knew that the new plan did not rectify the problem. The new plan was unanimously rejected by the Participants, and its more restrictive policies resulted in accelerated withdrawal requests, rapidly depleting the Debtors' cash and thereby precipitating these bankruptcy filings.

26. Shortly after the Debtors' Chapter 11 filings, the SEC and the Massachusetts Securities Division of the Secretary of State ("MSD") commenced litigation against the Debtors and others alleging, among other things, that the Debtors were engaged in the fraudulent sale of securities in violation of numerous state and federal securities laws. In connection with the institution of litigation, Homeland Security Investigations ("HSI") seized, among other things, forty-six (46) computers and servers that housed substantially all of the data to reconcile Participant activity.

27. The enforcement actions by regulatory agencies led to the appointment of the Trustee and his retention of M&K.

28. After the Trustee's appointment, the Department of Justice ("DOJ" and, together with the SEC and HSI, the "Federal Authorities") brought a criminal action against the Debtors' then principals, Carlos Wanzeler and James Merrill. Merrill entered a guilty plea and was sentenced to seventy-two (72) months in prison. Wanzeler initially fled the country. Upon information and belief, he may now be subject to extradition proceedings.

#### **FEE SUMMARY**

29. Attached hereto as Exhibit A is a copy of the order authorizing M&K's retention as counsel. Exhibit B contains a biographical description of each attorney who provided services. Attached hereto as Exhibits C-I is a detailed description of the services rendered by M&K as counsel to the Trustee during the Application Period. Indicated below are each category and the compensation sought by category:

|             |  |               |
|-------------|--|---------------|
| Category 1: | Services Relating to Claims Administration                                   | \$ 216,147.00 |
| Category 2: | Services Relating to Class Action Litigation                                 | \$ 266,005.00 |
| Category 3: | Services Relating to Litigation with PIEC                                    | \$ 178,340.00 |
| Category 4: | Services Relating to Other Avoidance Actions                                 | \$ 72,708.50  |
| Category 5: | Services Relating to Communications with Creditors and Governmental Agencies | \$ 28,205.00  |
| Category 6: | Services Relating to Case Administration                                     | \$ 223,007.50 |
| Category 7: | Services Relating to Fee/Employment Applications                             | \$ 35,288.50  |

30. Annexed to each category of services set forth in Exhibits C-I is a summary list of time expended by each professional in accordance with MLBR 2016-1(d).

31. During the Application Period, M&K expended a total of 1,897.9 hours in this matter for total requested compensation of \$1,019,701.50 resulting in an average hourly rate of \$537.27. As set forth in its retention application, M&K agreed to cap the rates charged by its shareholders at \$550 per hour for services rendered from its retention in June 2014 through December 31, 2015.<sup>4</sup> For calendar year 2016, M&K agreed to cap the rates charged by shareholders at \$590 per hour. For the period January 1, 2017 through April 30, 2018, M&K agreed to cap the rates charged by shareholders at \$625 per hour. Effective May 1, 2018, M&K has agreed to cap the rates charged by shareholders at \$650 per hour. The cap on shareholder rates results in a savings to the Estate with respect to this Application, from that which would have been customarily charged by M&K, in the amount of \$22,516.00.

#### **EXPENSE SUMMARY**

32. During the Application Period, M&K incurred expenses totaling \$25,859.45. Attached hereto as Table 2 is a summary of the expenses incurred for which reimbursement is herein sought.

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<sup>4</sup> M&K customarily adjusts its rates annually. The hourly rate charged by Harold Murphy and Charles Bennett was \$635 at the time of M&K's retention in 2014. These rates were adjusted to \$650 as of January 1, 2015, \$675 as of January 1, 2016 and through December 31, 2017, and \$695 as of January 1, 2018.

33. Although the MLBR, Appendix 2, allows firms to charge \$.15 per page for incoming telecopier/facsimile transmissions in lieu of calculating the actual cost of such expense, M&K does not charge for incoming faxes. M&K charges \$.50 per page for outgoing faxes, which M&K believes covers the expenses associated with facsimile usage. In-house copying charges are assessed at \$.15 per copy in compliance with MLBR, Appendix 2.

34. M&K seeks reimbursement of only the actual cost incurred to third party providers, without adjustment.

35. The actual expenses for which M&K seeks reimbursement were necessary, reasonable, and justified under the circumstances to serve the needs of the Trustee, the Estate, and creditors.

36. Pursuant to MLBR 2016-1(d), a narrative description of the services performed by M&K, by category, follows.

**Category 1**  
**Services related to Claims Administration**  
**(Exhibit C)**

37. The first category of services rendered by M&K relates to advising the Trustee in establishing a process for the resolution of disputed Participant claims, including the approval of a Claims Procedure Motion, resolution of objections to that motion, and examination of disputed claims potentially subject to objection.

38. Because of the number of Participants and the complexity of the Debtors' affairs, the Trustee implemented an electronic and interactive system for filing claims. More than 130,000 Participants filed claims through the electronic online portal (the "Portal") whereby Participants could input personal identifying information submitted when opening a User Account and thereby access the Debtors' records of activity attributable to that Participant. While this process was successful in reconciling more than 110,000 claims filed with the

Debtors' records, there remained thousands of claims that did not reconcile, either because Participants did not submit sufficient identifying information or because they disputed the User Account activity associated with them.

39. M&K participated in numerous conferences with the Trustee and his financial advisors Huron Consulting Group ("Huron") respecting the electronic proofs of claim ("ePOCs") filed with the Portal. In conjunction therewith, M&K examined stratifications of ePOC filing data, potential grounds for objection to disputed claims, and methodologies that could be employed to resolve disputed claims, taking into consideration the demographics of the claimants, the number of claims in dispute, and the grounds for objection. M&K conducted research respecting alternative claims procedures that have been employed in similar circumstances with extraordinary numbers of disputed claims.

40. In consultation with M&K, the Trustee settled on a process permitting Participants to be notified electronically of disputes to their claims and providing Participants with an opportunity to informally submit additional documentation or to negotiate a resolution of their claim with the Trustee. In the absence of a consensual resolution, the Trustee could employ an omnibus claims objection process, specially tailored to the circumstances of the case. In this regard, and in consultation with the Trustee and Huron, M&K drafted an omnibus motion to establish claims procedures (the "Claims Procedure Motion"), as well as proposed notices to be sent to Participants and a proposed form of order.

41. The principal objection to the Claims Procedure Motion was filed by the defendant class representatives ("Class Representatives") in the class action litigation ("Class Action Litigation") commenced by the Trustee against classes of Participants alleged to be net winners ("Net Winners") in the TelexFree Ponzi scheme. The Class Representatives expressed concern that the determination of claims pursuant to the Claims Procedure Motion might impair

the rights of Net Winners to assert an interest in User Accounts claimed by other Participants who filed proofs of claim. The potential for more than one Participant to claim an interest in a User Account was caused by the Debtor's failure to establish a mechanism for linking multiple User Accounts to a Participant.

42. M&K conferred with the Trustee and Huron respecting a variety of options for resolving the Class Representatives' concerns. Ultimately, and in consultation with the Class Representatives, the Trustee determined to create a second internet portal (the "Net Winner Portal") affording Net Winners an opportunity to register claims of ownership in User Accounts that were implicated in the claims allowance process. Through this mechanism, disputes could be identified and a process established for resolution. In effecting a resolution, M&K attended two hearings on the objection by the Class Representatives and worked with the Class Representatives to prepare modifications to the proposed order approving the Claims Procedure Motion. After entry of the agreed order, M&K advised and assisted the Trustee and his professionals in the development of the Net Winner Portal to ensure compliance with the order.

43. While Net Winners accessed the Net Winner Portal to register claims of ownership, M&K worked with the Trustee and Huron on the resolution of specific claims and a timeline for rolling out objections and notices. In this regard, M&K examined reports outlining the different categories of potential disputes, including duplicate claims, multiple claims asserting an interest in the same User Account, and claims asserting damages other than in accordance with the Net Equity formula approved by the Court. M&K attended several conferences to discuss the reports and alternatives for resolving the different categories of disputed claims.

44. In rendering services relating to this category, M&K attorneys expended 368.7 hours for requested compensation at their customary and usual hourly rates of \$216,147.00.



**Category 2**  
**Services relating to Class Action Litigation**  
**(Exhibit D)**

45. The second category of services rendered by M&K relates to the Class Action Litigation, including: (i) pretrial conferences and exchange of discovery in the Domestic Action; (ii) the appointment of a Class Representative and class counsel in the Foreign Action; (iii) the disposition of motions to dismiss filed in the Foreign Action; and (iv) the preparation of an expert report respecting the Trustee's methodology for determining Net Winners.

46. Prior to the Application Period and in consultation with M&K, the Trustee commenced the Class Action Litigation, consisting of two defendant class actions to recover the net winnings for the Debtors' bankruptcy estates (the "Estate"), one action solely against defendants located in the United States ("Domestic Action") and one against defendants located in foreign jurisdictions ("Foreign Action").

47. In connection with the Domestic Action, M&K attended several conferences with the Class Representative's professionals to discuss the issues in dispute, areas of agreement and opportunities to streamline the litigation. M&K assisted the Trustee in preparing an informal report to the Class Representative respecting the methodology used to compute Net Winners and examined the preliminary comments to the methodology from the financial advisor retained by the Class Representative. M&K attended a status conference and assisted the Trustee in producing records and information to the Class Representative.

48. While a Class Representative and class counsel had been appointed in the Domestic Action, none had been appointed in the Foreign Action as of the commencement of the Application Period. Two Net Winners thereafter expressed interest in serving as class representative, each with their own prospective class counsel, one of whom was already representing the Class Representative in the Domestic Action. M&K conferred with each

prospective counsel respecting, among other things, the status of the Foreign Action and opportunities to administratively consolidate the Class Action Litigation.

49. Before the defendant class in the Foreign Action could be certified, certain jurisdictional issues required resolution. Both prospective class representatives in the Foreign Action filed motions to dismiss ("Motions to Dismiss") the Complaint as to them for lack of personal jurisdiction. M&K performed extensive factual and legal research in connection with the Motions to Dismiss. M&K worked with Huron to determine the contacts that each movant had with TelexFree, including their establishment of User Accounts, Participant activity, receipt and disbursement of funds, and purposeful availment of contacts within the United States. M&K conducted extensive legal research respecting the Court's extraterritorial jurisdiction over the defendants and the extent of contacts required to establish personal jurisdiction. M&K then drafted and filed two comprehensive oppositions to the Motions to Dismiss and assisted the Trustee in preparation of affidavits. M&K represented the Trustee at oral argument, after which the Motions to Dismiss were denied.

50. Following the denial of the Motions to Dismiss, the Court appointed Franz Balan as Class Representative and Milligan Rona Duran & King as class counsel, the firm already serving as class counsel in the Domestic Action. M&K attended the status conference respecting class certification. M&K worked with counsel to the Class Representative to finalize a proposed form of order appointing the class representative and class counsel for the Foreign Action, including negotiations respecting the right of class counsel to be reimbursed for certain fees and expenses from the Estate up to a capped amount.

51. After the defendant class was certified, M&K negotiated, prepared, and filed a Rule 26(f) report and discovery plan and conferred with class counsel respecting scheduling and consolidated issues.

52. The methodology used to compute Net Winner status is a central issue in the Class Action Litigation. In order to advance a ruling on the appropriateness of the methodology, M&K provided advice and assistance to Huron in developing an expert report outlining Huron's analysis and findings.

53. M&K has also reviewed factual and legal issues pertaining to collection efforts, including applicable jurisdictional concerns.

54. In rendering services relating to this category, M&K attorneys expended 565.2 hours for requested compensation at their customary and usual hourly rates of \$266,005.00.

**Category 3**  
**Services relating to Litigation with PIEC**  
**(Exhibit E)**

55. The third category of services rendered by M&K relates to continued prosecution of the action (the "Dos Santos Action", Adversary Proceeding Number 15-4055) brought by the Trustee against certain Participants who were members of the Plaintiff Interim Executive Committee (the "PIEC") appointed in pending multi-district litigation ("MDL"), and related matters arising in the MDL.

56. Prior to the Application Period, the Trustee and the PIEC had filed cross-motions for summary judgment in the Dos Santos Action as to the issue of whether membership fees paid through Triangular Transactions were property of the Estate. In December 2017, the Court issued Proposed Findings of Fact and Rulings of Law ("Proposed Findings"), granting summary judgment in favor of the Trustee. The Proposed Findings have been submitted to the District Court for entry in accordance with applicable rules. The MDL Participants filed a lengthy objection challenging the Proposed Findings (the "Objection"). M&K reviewed the Objection and researched the factual and legal arguments made therein, conferred with the Trustee, and drafted a comprehensive response to the Objection. The MDL Participants filed a reply to the

Trustee's response. M&K considered the reply and, after concluding that certain allegations made were inaccurate or misleading, drafted and filed a sur-reply. At the present time, the Proposed Findings are under consideration with the District Court.

57. M&K also assisted the Trustee in responding to periodic document requests made by the PIEC in order to further their understanding of the Ponzi scheme and potential claims in the MDL action. In particular, M&K reviewed confidentiality agreements and advised the Trustee with respect to limitations on the production of documents that were privileged or otherwise confidential.

58. M&K reviewed and responded to filings made by the PIEC in the MDL, including a motion to modify the stay imposed in the MDL so that the PIEC could assert unjust enrichment claims against Net Winners, lest these claims might become time barred before the Dos Santos litigation concluded. M&K considered the motion and the proposed form of complaint and consulted with the Trustee respecting same.

59. In rendering services relating to this category, M&K attorneys expended 322.4 hours for requested compensation at their customary and usual hourly rates of \$178,340.00.

**Category 4**  
**Services Relating to Other Avoidance Actions**  
**(Exhibit F)**

60. The fourth category of services rendered by M&K pertain to the prosecution of litigation other than the Class Action Litigation and the Dos Santos Action.

61. The Trustee commenced approximately ten (10) avoidance actions against non-Participants. In addition, the Trustee brought an omnibus action against the Debtors' principals and certain Participants who were issued substantial amounts of Manual Credits, asserting claims for civil conspiracy, fraud, aiding and abetting the commission of fraud, and related relief (the

“Wanzeler Action”). Over the course of the Application Period, M&K worked to bring many of these actions to resolution, and made substantial progress in resolving others.

62. Prior to the Application Period, Sunwind Energy and its affiliates (collectively, “Sunwind”), a wind energy development firm, agreed to pay approximately \$3,000,000 to the Estate on account of monies previously advanced by TelexFree. During the Application Period, M&K worked toward collecting on the judgment.

63. M&K reviewed quarterly reports from Sunwind respecting its financial condition and efforts to sell its assets. M&K conferred regularly with Sunwind and prospective purchasers respecting the terms of any potential sale and the Trustee’s consent to a sale.

64. Sunwind reached a tentative agreement to sell its assets to Top Notch, an adjacent landowner. M&K drafted and filed a complaint and request for injunctive relief to ensure that sale proceeds were used in part to pay the Trustee’s judgment claim. The sale to Top Notch, however, was never consummated and the adversary proceeding was dismissed.

65. Several months later, Sunwind entered into a new agreement to sell its assets to Expedition Wind, LLC (“EW”). Once informed of the agreement, M&K entered into negotiations with Sunwind and EW respecting the timing and amount of any payments to the Estate from sale proceeds. In connection therewith, M&K examined the purchase and sale agreement, disbursement agreement, form of consent to sale, and other relevant documents. After an agreement was reached, M&K drafted and filed a motion to approve a compromise with Sunwind whereby the Estate could receive in excess of \$1,000,000 from the sale of Sunwind’s assets, depending upon EW’s success in developing the wind project, and would receive a cash payment of approximately \$150,000 upon closing.

66. M&K also worked collaboratively with the SEC to reach settlements of claims against parties who were defendants in both the administrative enforcement action commenced

by the SEC (the “SEC Action”) as well as adversary proceedings commenced by the Trustee, including (i) Joseph Craft, former chief financial officer of TelexFree and his affiliated entities (the “Craft Group”); (ii) Sanderley Rodrigues, a high level Net Winner; and (iii) Randy and Sonia Crosby, high level Net Winners. With respect to each of these defendants, M&K performed the following services:

- (i) Conferred with the SEC respecting the financial condition of the defendant;
- (ii) Participated in three way settlement discussions with the SEC and the defendant(s);
- (iii) Reviewed proposed judgments to be filed in the SEC Action and related consents;
- (iv) Drafted settlement agreements and motions to approve same.

67. The settlements with the Craft Group and Rodrigues have been approved by the Court and consummated. The settlement with Crosby is awaiting Court approval. As a result of these three settlements, M&K anticipates recoveries to the Estate of nearly \$2,000,000 in the aggregate.

68. M&K negotiated a resolution of several other adversary proceedings including actions against ISG Telecom and Infinium Wireless resulting in affirmative recoveries and waivers of administrative claims totaling more than \$100,000. In each instance, M&K negotiated and prepared the settlement agreements and motions to approve same.

69. In rendering services relating to this category, M&K attorneys expended 137.4 hours for requested compensation at their customary and usual hourly rates of \$72,708.50.

**Category 5**  
**Services Relating to Communications with Creditors and Governmental Agencies**  
**(Exhibit G)**

70. The fifth category of services pertains to services respecting communications and interactions with governmental authorities in these cases.

71. As set forth in prior applications, the Trustee and his professionals have worked closely with federal and state governmental entities in collecting assets for distribution to Participants and establishing a framework for allowance of Participant claims. A principal source of funding for distribution to Participants will likely be the cash and tangible assets seized by HSI at the inception of these cases, having a value of approximately \$140,000,000. Toward that end, M&K consulted with the DOJ respecting a preliminary order of forfeiture and a restitution order, each filed with the District Court, and pursuant to which the forfeited funds will be made available to the Trustee for distribution to Participants who have allowed claims against the Estate.

72. In connection with the criminal sentencing of Mr. Merrill, M&K assisted Huron and the Trustee in preparing potential testimony as expert witnesses, reviewed and considered the sentencing memoranda filed by the DOJ and Merrill, and attended the sentencing hearing.

73. M&K's services in this category also included monitoring activity in the SEC Action and the MSD administrative action and filing status reports and other responsive pleadings as necessary.

74. In rendering services relating to this category, M&K attorneys expended 48.8 hours for requested compensation at their customary and usual hourly rates of \$28,205.00.

**Category 6**  
**Services Relating to Case Administration**  
**(Exhibit H)**

75. The sixth category includes M&K services relating to tax disputes with the Internal Revenue Service (the "Service"), efforts to liquidate accounts and tangible assets in accordance with settlements; and other matters relating to case administration.

**I. Tax Related Services**

76. The Trustee does not believe that TelexFree had any taxable income or that any tax obligation is due. TelexFree engaged in a fraud and had no profits. The expenses associated with implementing the fraud are properly deductible. KPMG, the Trustee's tax advisor, prepared original and amended tax returns for TelexFree on behalf of the Trustee reflecting no amounts due for tax years 2012 through 2016, a right to a tax refund of \$692,854 for tax year 2012, and a tax refund of \$15,792,982 for tax year 2013.

77. In December 2016, in accordance with the return filed for 2013, the Service issued a refund due to the Estate of approximately \$15,000,000. The Service later alleged that the refund was issued in error, issued notices disallowing deductions for 2013, asserted an administrative claim of \$15,000,000 for the erroneous refund, and issued a notice of deficiency in excess of \$300,000,000. Thereafter, the Service issued additional notices disallowing deductions for tax year 2014 and increased their administrative claim by \$53,000,000 for alleged tax due for tax year 2014.

78. In response, M&K continued discussions with the DOJ in an effort to resolve the dispute without litigation, including replying to periodic requests for information as necessary. M&K reviewed responses prepared by KPMG to the notices of proposed disallowance of deductions for 2013 and 2014 and provided input where appropriate. M&K also worked with the Trustee and KPMG in filing further amended tax returns to: (i) reflect data from TelexFree's information management system records, rather than the less comprehensive general ledger, (ii) claim deductions based upon credits issues to Participants in the tax year rather than based upon a trailing 12 month liability, and (iii) claim deductions for casualty loss for assets seized by the federal government and for administrative expenses incurred by the Estate.



79. While seeking to resolve issues consensually with the DOJ, M&K began preparing to engage in a contested matter should it be required. M&K conducted legal research respecting the priority status accorded a refund issued postpetition for a prepetition tax year and drafted and submitted a memorandum to the DOJ respecting same. M&K also considered the applicability of Tax Directive 137, which provided for subordination of tax claims to the rights of victims in a Ponzi scheme. M&K began drafting a Complaint objecting to the claims of the Service, seeking authority to retain the 2013 refund and requesting turnover of the refund for 2012.

## **II. Asset Sale Services**

80. As set forth earlier, after the Court approved various settlements with the Debtor's officers and high level Participants, M&K assisted in consummating the agreements. In this regard, M&K drafted applications to retain real estate brokers to sell two properties located in Florida that were transferred to the Estate as part of the settlement with Sanderley Rodrigues. M&K performed all services necessary to assist in the sale process for the aforementioned Florida properties, including negotiating purchase and sale agreements, drafting sale motions and sale notices, and assisting in consummating sales.

81. M&K also advised and assisted the Trustee in implementing other aspects of the settlements with Rodrigues and Joseph Craft, including collection of funds in coordination with the SEC.

## **III. Other Case Administration Services**

82. Other services rendered by M&K in category 6 include reviewing and revising monthly operating reports; and responding to creditor and general public inquiries.

83. In rendering services relating to this category, M&K attorneys expended 396.6 hours for requested compensation at their customary and usual hourly rates of \$223,007.50.

**Category 7**  
**Services Relating to Fee/Employment Applications**  
**(Exhibit I)**

84. This category of services relates to work performed by M&K in preparing its Third Application, this Application, and in assisting the Trustee and other professionals in connection with their retentions and/or applications for compensation and attending the hearings relating to the applications.

85. In April 2017, M&K filed its Third Application for services rendered for the period from April 1, 2016 through February 28, 2017, spanning eleven (11) months. The Application Period includes approximately \$19,000 in time associated with preparing the Third Application and attending the hearing thereon.

86. M&K also completed a portion of the Application during the Application Period, and approximately \$8,000 of the time in this category is attributable to preparation of the Application. Additional time was incurred in preparing the Application after the close of the Application Period.

87. M&K provided advice and assistance to the Trustee's advisors in the preparation and completion of their applications for retention and applications for compensation. M&K drafted the application to employ Moeckler Realty, Inc. as real estate broker and assisted in preparing the supporting affidavit. M&K assisted KPMG in the preparation of its second interim fee application and assisted Huron in the preparation of its fourth interim application for compensation. M&K also assisted the Trustee and Huron in reviewing the invoice submissions from KCC and provided input to the Trustee respecting the appropriateness of charges. M&K expended approximately \$8,000 in time associated with the foregoing services.

88. In rendering services relating to this category, M&K attorneys expended 58.8 hours for requested compensation at their customary and usual hourly rates of \$35,288.50.

### ALLOWANCE OF REQUESTED COMPENSATION

88. Section 330 provides that a court may award a professional employed under section 327 of the Bankruptcy Code “reasonable compensation for actual, necessary services rendered ... and reimbursement for actual, necessary expenses.” *Id.* § 330(a)(1). Section 330 of the Bankruptcy Code sets forth the criteria for the award of such compensation and reimbursement:

- (3) In determining the amount of reasonable compensation to be awarded ... the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including—
  - (A) the time spent on such services;
  - (B) the rates charged for such services;
  - (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
  - (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance and nature of the problem, issue, or task addressed;
  - (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
  - (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

*Id.* § 330(a)(3).

89. M&K submits that compensation for the services rendered and reimbursement of expenses incurred is reasonable based on: (i) the time and labor required; (ii) the complexity of the legal questions presented; (iii) the skill required to perform the legal services; (iv) the customary compensation in Massachusetts; and (v) the experience and ability of the attorneys providing services.

90. With respect to each of these standards, M&K submits that the compensation requested is reasonable and appropriate.

91. The amount requested by M&K is well within the range of customary compensation awarded to other bankruptcy professionals with similar experience in the District of Massachusetts. The hourly rates charged by M&K, for both shareholders and associates, are equal to or less than those charged by and paid to other professionals with similar experience in other cases of similar complexity within the District, particularly given the voluntary rate reduction for shareholder services in this matter.

92. In determining the reasonableness of a compensation request, courts generally apply the lodestar method. *Boddy v. United States Bankruptcy Court (In re Boddy)*, 950 F.2d 334, 337 (6th Cir. 1991) (“The Supreme Court has made it clear that the lodestar method of fee calculation is the method by which federal courts should determine reasonable attorney’s fees under federal statutes that provide for such fees.”); *see also Shaw, Licitra, Parente, Esernio & Schwartz, P.Z. v. Travelers Indemnity Co. (In re Grant Associates)*, 154 B.R. 836, 843 (S.D.N.Y. 1993) (noting that the lodestar standard had been adopted by most courts calculating fees under section 330(a), and that “[g]iven the similarity in context and language between the two statutes, the same standard should apply” to fees under section 506(c)); *In re Drexel Burnham Lambert Group, Inc.*, 133 B.R. 13, 21-22 (Bankr. S.D.N.Y. 1991). Courts calculate the lodestar amount by multiplying the number of hours reasonably expended by the attorney’s reasonable hourly rate. *See Drexel*, 133 B.R. at 22 (citing *Pennsylvania v. Delaware Valley Citizens’ Council for Clean Air*, 478 U.S. 546, 565 (1986)). In assessing the reasonableness of a compensation request, there is a “strong presumption” that an attorney is entitled to the lodestar fee. *Id.* As set forth above, both the number of hours expended by M&K in this matter to date and the hourly rates charges satisfy the reasonableness standard.

**ATTORNEY STATEMENT PURSUANT TO APPENDIX B GUIDELINES**

93. In compliance with the Appendix B Guidelines, M&K provides the following information:

Question: Did M&K agree to any variations from, or alternatives to, its standard or customary billing rates, fees or terms for services pertaining to this engagement that were provided during the Application Period?

Response: M&K agreed to cap the hourly rates charged by shareholders at \$625 per hour during the Application Period, resulting in a voluntary reduction in fees sought of \$22,516.00.

Question: If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by ten percent (10%) or more, did you discuss the reasons for the variation with the Trustee?

Answer: M&K and the Trustee held regularly scheduled meetings throughout the cases to discuss all aspects of the administration of the cases, including budgeting, work plans, and prioritizing of matters. The Trustee was continually updated on the matters to which M&K devoted attention and the extent of services being provided. The fees incurred by M&K and billed in this Application are consistent with these communications. The Trustee has reviewed the Application and has no objection thereto.

Question: Have any of the professionals included in this fee application varied their hourly rate based upon the geographic location of the bankruptcy case?

Answer: No.

Question: Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices (limited to work involved in preparing and editing billing records that would not be compensable outside of bankruptcy and does not include reasonable fees for preparing a fee application)?

Answer: The fee application does not include time or fees relating to reviewing or revising time records or for preparing, reviewing, or revising invoices, other than reasonable and necessary fees incurred in preparing a fee application compliant with the statutes, rules, and guidelines of the Court and the United States Trustee.

Question: Does this fee application include time or fees for reviewing time records to redact any privileged or other confidential information?

Answer: No.

Question: Did the Trustee review and approve any rate increases in advance?

Answer: Yes, the Trustee was provided the rate increases that went into effect as of January 1, 2018. The cap for shareholder rates remained at \$625 for the entire Application Period.

Question: Did the Trustee agree when retaining M&K to accept all future rate increases?

Answer: Yes, as is set forth in the Trustee's application to retain M&K and subject to the agreed upon cap for shareholder rates.

### **CONCLUSION**

94. M&K provided substantial services to the Trustee in his administration of the Estate during the Application Period. The Trustee's services covered a variety of different areas, as set forth in the Application.

95. M&K's services have been reasonable and necessary and performed in a cost effective manner. Based upon the foregoing, M&K asserts that approval of its fees and expenses, in the amounts requested, is appropriate.

**WHEREFORE**, M&K respectfully moves the Court for an Order:

(i) approving on an interim basis fees in the sum of \$1,019,701.50 and reimbursement of expenses in the sum of \$25,859.45 for services rendered and expenses incurred during the Application Period;

(ii) authorizing payment of such fees and expenses; and

(iii) granting such other relief as is just and proper.

MURPHY & KING  
PROFESSIONAL CORPORATION,  
BY,

/s/ Andrew G. Lizotte

Harold B. Murphy (BBO #362610)

Andrew G. Lizotte (BBO #559609)

MURPHY & KING

Professional Corporation

One Beacon Street

Boston, MA 02108

(617) 423-0400

Email: [ALizotte@murphyking.com](mailto:ALizotte@murphyking.com)

Dated: April 17, 2018  
740498

EXHIBIT A

ORDER



UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
CENTRAL DIVISION

In re:

TELEXFREE, LLC,  
TELEXFREE, INC.  
TELEXFREE FINANCIAL, INC.

Debtors.

Chapter 11 Cases

14-40987-MSH  
14-40988-MSH  
14-40989-MSH

Jointly Administered

**VERIFIED APPLICATION BY STEPHEN B. DARR, CHAPTER 11 TRUSTEE,  
TO RETAIN MURPHY & KING, PROFESSIONAL CORPORATION AS COUNSEL**

Pursuant to 11 U.S.C. §§ 327 and 330, Federal Rule of Bankruptcy Procedure 2014 and Massachusetts Local Bankruptcy Rule 2014-1, Stephen B. Darr, the duly appointed Chapter 11 trustee (the "Trustee") of the bankruptcy estates (the "Estates") of TelexFree, LLC, TelexFree, Inc., and TelexFree Financial, Inc. (collectively, the "Debtors") respectfully requests that this Court to enter an order authorizing the Trustee to retain Murphy & King, Professional Corporation ("M&K") as counsel to the Trustee. In further support of this application, the Trustee states as follows:

**JURISDICTION**

1. The Court has jurisdiction to consider and determine this application pursuant to 28 U.S.C. § 1334. This is a core proceeding within the meaning of 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The statutory predicates for the relief requested herein are contained in 11 U.S.C. §§327 and 330 of the Bankruptcy Code, Federal Rule of Bankruptcy Procedure 2014 and Massachusetts Local Bankruptcy Rule 2014-1.

07/14/2014 ALLOWED. NO OBJECTIONS FILED.

*Stephen B. Darr*

EXHIBIT B  
BIOGRAPHIES

**HAROLD B. MURPHY.** Admitted to bar, 1981, Massachusetts. **Education:** Harvard College (A.B., cum laude, 1977); Suffolk University Law School (J.D., 1981). Law Clerk to the U.S. Trustee, Districts of Maine, New Hampshire, Massachusetts and Rhode Island, 1980-1981; to the Hon. Thomas W. Lawless, Chief Judge, U.S. Bankruptcy Court, Boston, Massachusetts, 1981-1984. **PRACTICE AREAS:** Bankruptcy and Financial Restructuring.

**CHARLES R. BENNETT, JR.** Admitted to bar, 1974, Commonwealth of Massachusetts, also admitted to the Court of Appeals for the First Circuit; the United States District Court for the District of Massachusetts; the State of New Hampshire; the United States District Court for the District of New Hampshire; the State of Rhode Island; and the United States District Court for the District of Rhode Island. **Education:** Boston College (Boston College, 1970); Boston College Law School (J.D., 1974). **PRACTICE AREAS:** Bankruptcy Law; Commercial Litigation.

**ANDREW G. LIZOTTE.** Admitted to bar, 1991, Massachusetts; 1992, U.S. District Court, District of Massachusetts and U.S. District Court, District of Connecticut. **Education:** Bryant College (B.S., 1986); Suffolk University (J.D., 1991). Law Clerk to the Honorable James F. Queenan, Jr., U.S. Bankruptcy Court, District of Massachusetts. Certified Public Accountant, Rhode Island, 1988. **PRACTICE AREAS:** Bankruptcy and Financial Restructuring.

**DANIEL M. RABINOVITZ.** Admitted to bar, Massachusetts, Illinois, Florida and Colorado; U.S. District Court of Massachusetts; U.S. District Court of Illinois. **Education:** Union College, B.A., 1987; Boston University School of Law, J.D., 1990. **PRACTICE AREAS:** White Collar Defense and Internal Investigation, Business Litigation, Securities Litigation and State Criminal Defense.

**CHRISTOPHER M. CONDON.** Admitted to bar, 2002, Massachusetts; 2002 U.S. District Court for the District of Massachusetts; First Circuit Court of Appeals, 2007. **Education:** Washington and Lee University, (B.A. 1998); Boston University School of Law, J.D. cum laude, 2001. **PRACTICE AREAS:** Bankruptcy Law and Litigation.

**MICHAEL O'NEIL.** Admitted to bar, 2012, Massachusetts; State of New Hampshire; Commonwealth of Massachusetts; US District Court, District of New Hampshire, US District Court, District of Massachusetts. **Education:** Tufts University, B.A., 2008, Boston College Law School, J.D., 2012. **PRACTICE AREA:** Bankruptcy Law.

**ANDREA G. MILLER (BRIER)** – Admitted to bar 2010, Massachusetts; 2011, New York (Third Judicial Department); 2014, U.S. District Court for the Eastern District of New York & U.S. District Court for the Southern Districts of New York; 2015, U.S. District Court for the District of Massachusetts & U.S. Court of Appeals for the First Circuit; 2016, Supreme Court of

the United States. **Education:** University of Pennsylvania, (B.A. *summa cum laude* 2005); Oxford University (M.St. *with distinction*, 2007); Harvard Law School, (J.D. 2010). **PRACTICE AREAS:** Bankruptcy Law.

**THEODORE J. FOLKMAN.** Admitted to bar, 2001, Massachusetts. Also admitted to U.S. District Court, District of Massachusetts and U.S. Court of Appeals, First Circuit. **Education:** Princeton University, (A.B., magna cum laude, 1996); Columbia University, (M.A., 1997); Harvard Law School (J.D. cum laude, 2000). Law clerk to the Honorable Ann Aldrich, U.S. District Court for the Northern District of Ohio. **PRACTICE AREA:** Business Litigation.

**JONATHAN F.X. O'BRIEN.** Admitted to bar, New York, 2000 Paris, France, 2002 Massachusetts, 2009. **Education:** McGill University, B.A. with Honors, 1996 Tulane Law School, J.D., 1999. **PRACTICE AREAS:** Corporate Law; Real Estate; Mergers, Acquisitions and Divestitures.

**SHAWN LU.** Admitted to bar, Commonwealth of Massachusetts. **Education:** Washington University in St. Louis, B.A., 2007, Boston University School of Law, J.D., 2010. Prior to joining Murphy & King, Mr. Lu clerked for the Justices of the Massachusetts Superior Court, where he assisted Justices in all phases of civil and criminal litigation. **PRACTICE AREAS:** Business Litigation.

**ANDREA L. MACIVER.** Admitted to bar, Commonwealth of Massachusetts; U.S. District Court, Massachusetts; Illinois State Bar; U.S. District Court Northern & Southern District of Illinois. **Education:** Stonehill College, BA in Political Science, *Magna Cum Laude*, 2008; DePaul University College of Law, J.D., *Magna Cum Laude & Order of the Coif*, 2011. Prior to joining Murphy & King, Ms. MacIver was an Appellate Judicial Clerk for the Honorable Nathaniel R. Howse, Jr. of the Illinois Appellate Court, First District of Chicago. **PRACTICE AREA:** Business Litigation.

**AMANDA SPANOS.** **Education:** Northeastern University (Paralegal Certificate); Legal Assistant (Bankruptcy), Murphy & King, Dec. 1994 – present.

**CHRISTINE E. WILKINS.** **Education:** Suffolk University (B.A. 1995); Suffolk University (Paralegal Certificate Program-Certificate to be Awarded); Legal Assistant (Workers Compensation), Marcotte Law Firm, 1999-2000; Legal Assistant (Tenant/Landlord, Construction Litigation, Real Estate, Estate Planning), Donahue & Donahue, 2000-2001; Paralegal (Landlord/Tenant, Civil Litigation), Boston Housing Authority, 2001-2007; Paralegal (Business Litigation, Construction Litigation), McCarter & English, 2007-2008; Paralegal [Contractor] (Asset Forfeiture, Civil Litigation), United States Attorney's Office for the District of Massachusetts, 2008-2011; Paralegal (Civil Litigation, Bankruptcy), Murphy & King, P.C., 2011 to present.

**ANDREA N. MAZZARELLA.** **Education:** Misericordia University (B.A., 2000); Simmons College (M.S., 2010). **Member:** Massachusetts Paralegal Association. Notary Public, Massachusetts, 2012. **PRACTICE AREAS:** Corporate and Real Estate Law.

EXHIBIT C

SERVICES RELATING TO CLAIMS ADMINISTRATION

| <u>Date</u> | <u>Atty</u> | <u>Description</u>  | <u>Hours</u> |
|-------------|-------------|---|--------------|
| 03/01/17    | AGL         | Email and telephone conference with Mike Loby (DOJ) re: bar date  | 0.30         |
| 03/02/17    | AGL         | Emails and telephone conference with DOJ re: bar date issues, conditions for extension; revise motion to extend   | 1.00         |
| 03/06/17    | AGL         | Emails with KCC re: final notice of ePOC deadline   | 0.20         |
| 03/08/17    | AGL         | Telephone conference with creditors re: bar date reminder   | 0.20         |
| 03/08/17    | AGL         | Emails re: revised messages on post-bar date; telephone conference with trustee re: same  | 0.80         |
| 03/08/17    | HBM         | Telephone call with trustee re: variety of issues re: claims, bar date, information requested by USA and status memo  | 0.40         |
| 03/09/17    | AGL         | Email to IRS re: bar date extension   | 0.20         |
| 03/10/17    | AGL         | Review letter from P. Davila re: his claim; email re: same  | 0.20         |
| 03/13/17    | AGL         | Review and respond to email claim inquiry   | 0.20         |
| 03/13/17    | AGL         | Final review/revision of motion to extend IRS deadline and related order; email to DOJ re: same   | 0.30         |
| 03/14/17    | HBM         | Emails with USA and trustee re: claims issues   | 0.20         |
| 03/15/17    | AGL         | Review email from I. Rona re: difficulty filing class action claims; telephone conference with Rona re: same  | 0.40         |
| 03/15/17    | AGL         | Emails re: reconciliation of claims filed on FBI website, notice issues; telephone conference with T. Martin re: final bar date notice, process for reviewing and objecting to claims | 0.70         |
| 03/16/17    | AGL         | Address in person ePOC inquiry  | 0.20         |
| 03/16/17    | AGL         | Emails re: fraudulent letters seeking participant data  | 0.20         |
| 03/16/17    | AGL         | Telephone conference with T. Martin re late class claim, claim objections and distribution issues; telephone conference and emails with J. Pooler and Trustee re: same                | 1.00         |
| 03/27/17    | AGL         | Telephone conference with T. Martin re: late claim filing motions   | 0.20         |
| 03/28/17    | AGB         | Meet w. H. Murphy and A. Lizotte re: Telexfree assignment concerning bar date order/notice and exclusive use of ePOC  | 0.20         |

|          |     |   |      |
|----------|-----|---|------|
| 03/28/17 | AGB | Conduct research re: late-filed proofs of claim and necessity of objections thereto   | 2.00 |
| 03/28/17 | AGL | Telephone conference with J. Shapiro re: late claim   | 0.10 |
| 03/28/17 | AGL | Analysis of class action proofs of claim  | 1.00 |
| 03/28/17 | AGL | Prepare for and attend conference with trustee re: release of tax data, late claims, ePOC process; conferences with H. Murphy, C. Bennett   | 2.50 |
| 03/28/17 | CRB | Conference with H. Murphy and A. Lizotte regarding status, late claims, and class action claims   | 0.30 |
| 03/28/17 | HBM | Work on issues re: class action claim; conference with C. Bennett re: same  | 0.40 |
| 03/28/17 | HBM | Work on issues related to claims allowance, disclosure and issues re: supplemental notices and objections; conference with A. Lizotte and A. Brier re: same                                   | 1.00 |
| 03/28/17 | HBM | Status conference with Trustee and Huron re: claims, forfeiture, taxes, etc.; conference with A. Lizotte before and after call  | 1.40 |
| 03/29/17 | AGL | Telephone conference with T. Martin re: claims noticing issues, PIEC request for claims data; review claims order re: same; conference with H. Murphy, T. Martin re: treatment of late claims | 1.00 |
| 03/30/17 | AGL | Telephone conference with A. Lelling re: late filed claims  | 0.10 |
| 03/30/17 | AGL | Begin work on Shapiro claim stipulation   | 0.20 |
| 03/30/17 | AGL | Conference with A. Brier re: late claim issues  | 0.20 |
| 03/31/17 | AGL | Work on stipulations with J. Shapiro, I Rona re: late claims  | 1.50 |
| 04/03/17 | AGB | Research re. distributions on late-filed claims, necessity of objecting thereto   | 0.40 |
| 04/03/17 | AGL | Revise stipulations to extend bar date; emails re: same   | 0.30 |
| 04/04/17 | AGL | Edits to stipulation with J. Shapiro re: late filed claims; draft response; arrange for filing  | 0.50 |
| 04/07/17 | AGL | Emails with J. Shapiro re: filing, amending claims; telephone conference with Tim Martin re: same; telephone conference with D. McCormack re: same  | 0.50 |
| 04/10/17 | AGL | Review misfiled, late claims  | 0.20 |
| 04/11/17 | AGL | Emails with I. Rona re: late filed claims   | 0.20 |
| 04/19/17 | AGL | Telephone conference from Rexnord re: late claim  | 0.20 |
| 04/25/17 | HBM | Review IRS motions; conference with A. Lizotte re: same   | 0.80 |
| 05/01/17 | AGL | Telephone conference to A. Deering re: claim status   | 0.10 |
| 05/01/17 | AGL | Review proposed revisions to stipulation with class on late class claims; email to I Rona re: same  | 0.40 |
| 05/02/17 | AGL | Emails with T. Martin re: claims meeting  | 0.10 |
| 05/02/17 | AGL | Research late filed claim law   | 1.00 |
| 05/04/17 | AGL | Telephone conference with T. Martin re: claims meeting  | 0.20 |

|          |     |  |      |
|----------|-----|--|------|
| 05/05/17 | AGL | Review class counsel revisions to stipulation on late claim; emails to trustee, I. Rona re: same   | 0.50 |
| 05/08/17 | AGL | Telephone conference with T. Martin re: class proof of claim; arrange claims meeting   | 0.30 |
| 05/09/17 | AGL | Conference with Huron, H. Murphy re: claims resolution   | 0.30 |
| 05/10/17 | AGL | Work on stipulation/motion for late class claim filings  | 0.80 |
| 05/10/17 | AGL | Telephone conference with T. Martin re: preparation for claims meeting; email to KCC re: objection process; telephone conference with L. Mendizabal re: same | 0.80 |
| 05/10/17 | MKO | Research re: claims resolution processes in Ponzi cases; review dockets and pleadings and case law   | 4.30 |
| 05/11/17 | AGL | Follow up with BMC, KCC re: claims procedure options; conference with M. O'Neil re: same; review Zeek Rewards, MF Global pleadings                           | 2.00 |
| 05/11/17 | AGL | Prepare for and attend meeting with trustee re: claims process, class action, taxes  | 2.50 |
| 05/11/17 | MKO | Continue review of Ponce and related cases re: claims resolution process; draft memo re: same; confer with A. Lizotte re: same                               | 3.50 |
| 05/15/17 | AGL | Telephone conference with trustee re: rescheduling claims meeting  | 0.20 |
| 05/22/17 | AGL | Begin working on claims objections memo  | 2.00 |
| 05/23/17 | AGL | Additional work on memo re: claims resolution alternatives   | 2.00 |
| 05/23/17 | MKO | Review Pattens documents re: claims resolution memo; email to A. Lizotte re: same  | 0.20 |
| 05/24/17 | AGL | Emails re: 5/25 claims meeting; work on agenda, telephone conference with T. Martin re: same   | 1.00 |
| 05/25/17 | AGL | Prepare for and attend meeting with trustee, Huron re: claims objections   | 2.50 |
| 05/25/17 | HBM | Prepare for and attend meeting with Trustee, Huron and A. Lizotte re: claims analysis and outline of potential allowance process, issues and procedures      | 2.00 |
| 05/30/17 | HBM | Conference with A. Lizotte re: claims issues   | 0.30 |
| 05/31/17 | AGL | Emails with Huron re: glitches in claims data  | 0.20 |
| 05/31/17 | AGL | Work on claims procedure memo; lengthy telephone conference with Tim Martin re: same   | 3.00 |
| 06/01/17 | AGL | Review emails on duplicate claim numbers   | 0.20 |
| 06/02/17 | AGL | Emails with G. Abreau re: claims, case status  | 0.20 |
| 06/02/17 | AGL | Work on claim determination notice   | 2.50 |
| 06/05/17 | AGL | Work on claims process memo and supporting exhibits  | 3.70 |
| 06/05/17 | MKO | Review Madoff decision re: claim calculation; email to A. Lizotte re: same   | 0.30 |
| 06/06/17 | AGL | Prepare for and attend call with BMC re: claims data analysis  | 0.70 |

|          |     |   |      |
|----------|-----|---|------|
| 06/07/17 | AGL | Telephone conference from D. McCormack re: claims process   | 0.20 |
| 06/07/17 | AGL | Review Huron analysis of basis for claims objections and required documents; telephone conference with T. Martin re: same                 | 1.00 |
| 06/09/17 | AGL | Review 2nd circuit inter account decision   | 0.30 |
| 06/09/17 | AGL | Telephone conferences with Huron re: IRS difficulties in filing claim   | 0.30 |
| 06/12/17 | AGL | Additional work on claims process memo; telephone conference with trustee   | 2.50 |
| 06/13/17 | AGL | Conference with H. Murphy re: omnibus claims process  | 0.50 |
| 06/13/17 | HBM | Work on memo re: claim procedure process for disputed claims; review selected case re: same; several conferences with A. Lizotte re: same | 2.50 |
| 06/26/17 | AGL | Emails with BMC re: 6/28 conference on claims   | 0.20 |
| 06/26/17 | AGL | Continued work on claims objection process, alternatives  | 3.00 |
| 06/26/17 | MKO | Review claims determination motions; confer with A. Lizotte re: same  | 0.30 |
| 06/26/17 | MKO | Review MF Global claims process and confer with A. Lizotte re: same   | 0.50 |
| 06/27/17 | AGL | Review MF Global claims procedures; telephone conference with T. Martin re: same, BMC data issues   | 1.50 |
| 06/27/17 | HBM | Telephone call with trustee re: case status; review email from Huron re: claims issues and tomorrow's meeting                             | 0.60 |
| 06/27/17 | MKO | Review MF claims motion materials; email to A. Lizotte re: same   | 0.30 |
| 06/28/17 | AGL | Review schedules, contingent, unliquidated issues   | 0.50 |
| 06/28/17 | AGL | Review memo re: summary of claims register issues; telephone conference with T. Martin; prepare for and attend claims calls with BMC      | 2.00 |
| 06/28/17 | HBM | Prepare for and participate in conference with claims agent re: claim issues; meeting with A. Lizotte re: claims processing issues        | 2.00 |
| 07/05/17 | AGL | Emails with D. Sadolk re: claim status; emails with S. Penedo re: same  | 0.40 |
| 07/05/17 | AGL | Begin drafting omnibus claims motion; research procedure in other cases   | 7.50 |
| 07/05/17 | HBM | Emails re: proof of claims issues and tax issues  | 0.40 |
| 07/06/17 | AGL | Continued work on omnibus claims motion; research 3007 requirements   | 3.00 |
| 07/06/17 | MKO | Research re: claims process motion in bankruptcy  | 4.00 |
| 07/07/17 | AGL | Emails with J. Gonzalves re: proof of claim   | 0.20 |
| 07/11/17 | AGL | Emails re: trustee conference call; review proposed agenda; conference call with trustee re: claims, taxes, settlements                   | 1.00 |



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| 07/11/17 | AGL | Revise omnibus claim objection   | 2.00 |
| 07/11/17 | HBM | Review order; emails re: same; telephone call with<br>Trustee re: same   | 0.80 |
| 07/11/17 | HBM | Review agenda and prepare for status call; participate<br>in status call with trustee and Huron                              | 1.20 |
| 07/13/17 | AGL | Conference with H. Murphy re: claims procedure   | 0.50 |
| 07/13/17 | CRB | Claim and distribution provisions  | 0.40 |
| 07/13/17 | HBM | Work on claims motion and first draft; conference with<br>A. Lizotte re: issues and revisions re: same                       | 2.40 |
| 08/02/17 | AGL | Meeting with T. Martin re: claims issues (1.0)   | 0.50 |
| 08/08/17 | AGL | Telephone conferences with T. Martin re: claim<br>classification issues  | 0.20 |
| 08/09/17 | AGL | Review Huron analysis of potential non-participant<br>claims   | 0.30 |
| 08/16/17 | AGL | Telephone conference with T. Martin re: BMC, claims<br>status  | 0.20 |
| 08/16/17 | AGL | Telephone conference from trustee re: GBLS request for<br>claim update   | 0.30 |
| 08/22/17 | AGL | Review claims email from Huron; conference with C.<br>Bennett  | 0.30 |
| 08/22/17 | AGL | Conference with H. Murphy, trustee re: claims<br>objections, restitution; arrange for conference calls with<br>KPMG, Trustee | 0.80 |
| 08/22/17 | HBM | Work on issues re: claims process matter; review recent<br>case re: issues re: same  | 0.80 |
| 08/23/17 | AGL | Review Zeek Rewards claims process, email from T.<br>Martin re: same   | 0.70 |
| 08/23/17 | HBM | Review matter in Zeek; emails re: same; conference<br>with A. Lizotte re: issues re: same                                    | 0.80 |
| 08/24/17 | AGL | Prepare for/attend meeting with Trustee re: claims<br>process  | 2.50 |
| 08/29/17 | AGL | Email from Trustee re: claim inquiry   | 0.10 |
| 08/30/17 | HBM | Work on claims issues; conference with A. Lizotte re:<br>same  | 0.80 |
| 09/07/17 | AGL | Work on claims protocol motion   | 2.00 |
| 09/08/17 | AGL | Telephone conference with Huron, BMC re: cleanup of<br>claims glitches, creation of register                                 | 1.30 |
| 09/08/17 | AGL | Analysis of issues re: claims protocol; additional<br>drafting of omnibus claims motion                                      | 3.00 |
| 09/11/17 | AGL | Work on omnibus claims motion; review bar date order,<br>docket  | 5.50 |
| 09/12/17 | AGL | Research claims protocol alternatives  | 1.80 |
| 09/13/17 | AGL | Telephone conference with J. Sternklar re: Esam claim  | 0.20 |
| 09/13/17 | AGL | Emails with BMC, Huron re: claims register, notice to<br>participants correcting glitches                                    | 0.40 |
| 09/13/17 | AGL | Conference with H. Murphy re: revisions to claims  | 1.00 |



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|          |     | protocol motion   |      |
| 09/13/17 | HBM | Work on claims resolution motion; conference with A. Lizotte re: issues and revisions re: same  | 1.80 |
| 09/14/17 | AGL | Research background materials for claims protocol motion  | 2.00 |
| 09/14/17 | HBM | Work on claims issues; telephone call with trustee re: same and review issues re: protocol  | 1.70 |
| 09/15/17 | AGL | Review issues re: supplemental notices from BMC to participate on ePOC's to correct glitches  | 0.40 |
| 09/15/17 | AGL | Meeting with trustee re: claims objections, register  | 0.70 |
| 09/15/17 | AGL | Work on claims objection procedures/protocol  | 1.60 |
| 09/15/17 | HBM | Meeting with client and Huron re: claims resolution issues and process  | 1.30 |
| 09/18/17 | MKO | Research recent case law re: claims process and priority; confer with A. Lizotte re: same   | 0.70 |
| 09/20/17 | AGL | Emails to T. Martin re: claims register, noticing to creditors  | 0.50 |
| 09/22/17 | AGL | Work on notice of claim deficiency  | 1.00 |
| 09/22/17 | AGL | Work on claims protocol motion  | 4.60 |
| 09/25/17 | AGB | Review terms of KCC and BMC retentions to discern terms of access to claims register  | 0.20 |
| 09/25/17 | AGL | Prepare for and attend call with BMC re: update on claims register, ePOCs   | 1.00 |
| 09/25/17 | AGL | Work on notice of claim determination; conference with H. Murphy re: revisions to claims procedure motion   | 2.00 |
| 09/25/17 | HBM | Final review and revisions to draft motion re: claims procedure; conference with A. Lizotte re: same  | 2.80 |
| 09/26/17 | AGL | Emails with Huron re: disposition of faulty Dominican claims  | 0.30 |
| 09/26/17 | AGL | Work on revisions to claims procedure motion and exhibits   | 2.00 |
| 09/28/17 | AGL | Revisions to claims procedure motion  | 1.00 |
| 09/28/17 | HBM | Review and revisions to draft motion re: claims procedures  | 1.00 |
| 09/29/17 | AGL | Telephone conference with trustee re: claimants in Africa   | 0.20 |
| 09/29/17 | AGL | Revisions to claims procedure motion and proposed allowance notice  | 3.00 |
| 10/03/17 | AGL | Review letter from B. Nausibulina re: his claim   | 0.20 |
| 10/03/17 | AGL | Lengthy telephone conference with Tim Martin re: revisions to claims procedures, form of claims register, notice of claim allowance; review draft register, proposed emails to Participants re: claim adjustments | 2.00 |
| 10/04/17 | AGL | Emails with T. Martin re: claims register; emails with BMC re: faulty Dominican claims  | 0.30 |
| 10/05/17 | AGL | Conference with H. Murphy re: claims procedure issues;  | 0.80 |

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|          |     | memo to trustee re: same  |      |
| 10/05/17 | AGL | Review proposed claim procedures; draft notice of claim allowance and affidavit of agreed claim allowances                      | 2.00 |
| 10/05/17 | AGL | Draft proposed order on claims procedures   | 2.00 |
| 10/05/17 | HBM | Work on revisions to claims notice; conference with A. Lizotte re: same; email to trustee re: same                              | 0.90 |
| 10/06/17 | AGL | Prepare for and attend conference call with T. Martin re: claims procedures, reconciliation process                             | 0.80 |
| 10/09/17 | AGL | Telephone conference with trustee re: claims procedure  | 0.20 |
| 10/10/17 | AGL | Begin drafting notice of deadline to correct Standard ePOC  | 0.30 |
| 10/11/17 | AGL | Additional drafting of notice to correct form of ePOC filed   | 0.30 |
| 10/11/17 | AGL | Work on email notices to Participants for portal claim confirmations, corrections   | 0.30 |
| 10/11/17 | AGL | Work on exhibits to claims procedure motion; telephone conference with Huron re: same   | 1.00 |
| 10/11/17 | HBM | Review and revise draft exhibits to clean motion; brief conference with A. Lizotte re: same                                     | 0.80 |
| 10/12/17 | AGL | Review Huron new model for claims notices to Participants; telephone conference with T. Martin, Trustee re: same                | 1.00 |
| 10/12/17 | AGL | Review trustee comments on claims procedure and exhibits; conference with trustee; work on revisions                            | 1.40 |
| 10/13/17 | AGL | Further revisions to claims procedure motion; telephone conferences with T. Martin; review exhibits; work on translation issues | 3.50 |
| 10/13/17 | HBM | Review claim exhibit; conference with A. Lizotte re: same   | 0.60 |
| 10/16/17 | AGL | Telephone conference with trustee re: claims; work on revisions   | 1.60 |
| 10/17/17 | AGL | Emails with S. Pineda re: claims, case status   | 0.30 |
| 10/17/17 | AGL | Prepare for and attend conference call with BMC re: portal, claims procedures and issues  | 0.80 |
| 10/18/17 | AGL | Telephone conference with claimant (Natalie) re: claims status  | 0.20 |
| 10/18/17 | AGL | Emails with M. Murrane, SEC re: claims process motion   | 0.30 |
| 10/18/17 | AGL | Work on revised language for Participant notices re: ePOC glitches  | 0.40 |
| 10/20/17 | AGL | Telephone conference with trustee re: response to claims motion   | 0.20 |
| 10/20/17 | AGL | Final review of notices to participants re: ePOC confirmations, adjustments, thereto  | 0.30 |
| 10/23/17 | AGL | Review hearing notice on claims procedure motion  | 0.10 |
| 10/30/17 | HBM | Telephone call from creditor attorney re: claims  | 0.20 |

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| 10/31/17 | HBM | Email to trustee re: claims  | 0.20 |
| 11/06/17 | AGL | Email from J. Sternklar re: Abdelgir claim   | 0.10 |
| 11/08/17 | AGL | Emails with Miguel Celi re: claims status  | 0.20 |
| 11/13/17 | AGL | Telephone conference with W. Pria re: claims status  | 0.20 |
| 11/13/17 | AGL | Telephone conference with P. Riordan re: Mederios claim; conference with J. Sorondo re: same, ePOC register  | 0.40 |
| 11/14/17 | AGL | Analysis of class objection to claims allowance procedures; conferences with H. Murphy, T. Martin re: same   | 1.00 |
| 11/14/17 | HBM | Initial review of class representative objection to claims motion  | 1.50 |
| 11/14/17 | MKO | Conference with A. Lizotte re: class defendants' objection to claim determination motion; begin review of same and research of case law re: same   | 1.50 |
| 11/15/17 | AGL | Telephone conference with trustee re: Rona objection to claims procedures; emails and telephone conferences with Huron re: same; review Stoneturn fee issue; conference with C. Bennett re: same | 2.50 |
| 11/15/17 | AGL | Conference with H. Murphy re: overview/outline of reply to Rona claim objection; begin work on reply; assemble prior pleadings   | 3.50 |
| 11/15/17 | CRB | Conference with A. Lizotte regarding interrelationship between class action and the claim objection procedure  | 0.60 |
| 11/15/17 | HBM | Work on outline of reply to class action objection to claims motion; conference with A. Lizotte re: same   | 2.50 |
| 11/15/17 | MKO | Continue research and review of case law re: standing of creditors to object to claims; begin draft memo re: same  | 5.30 |
| 11/16/17 | AGL | Research party in interest rules on claims objection   | 1.00 |
| 11/16/17 | AGL | Work on reply to Rona objection to claims procedures   | 3.00 |
| 11/16/17 | MKO | Additional research re: contested ownership of claims; conference with A. Lizotte re: same   | 1.00 |
| 11/17/17 | AGL | Emails with B. Madred re: claim status   | 0.10 |
| 11/17/17 | AGL | Draft reply to Rona objection on claims procedure; research docket, prior pleadings  | 4.50 |
| 11/20/17 | AGL | Work on revised proposed order on claims procedures; conference with H. Murphy, C. Bennett re: same  | 0.80 |
| 11/20/17 | AGL | Additional drafting of reply to Rona claim objection; telephone conference with T. Martin re: same; lengthy conference with H. Murphy re: revisions to reply, strategy                           | 5.50 |
| 11/20/17 | CRB | Conference to review the class action defendants' objection to the Trustee's motion for procedural order to determine claims and response thereto  | 1.60 |
| 11/20/17 | HBM | Work on resolving issues with class action objections to   | 1.30 |

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|          |     | claims motion language for order; conference with A. Lizotte and C. Bennett re: same   |      |
| 11/20/17 | HBM | Work on reply to objection to omnibus claims procedure motion; conference with C. Bennett and A. Lizotte re: interplay of claims allowance process and class action  | 4.00 |
| 11/21/17 | AGL | Revisions to proposed order on claims procedures; conference with H. Murphy re: same   | 1.30 |
| 11/21/17 | AGL | Prepare for and attend conference call with I. Rona re: his objection to claims procedures; conference with H. Murphy, C. Bennett re: same; telephone conference with trustee re: same   | 2.30 |
| 11/21/17 | AGL | Further revisions to reply on claims procedures  | 3.00 |
| 11/21/17 | CRB | Conference regarding class action objection to claim procedural order; and proposed agreed order   | 0.40 |
| 11/21/17 | HBM | Work on language proposed to procedure order to address objections by class action parties   | 1.00 |
| 11/22/17 | AGL | Telephone conference with T. Martin re: reconciliation of net winners to claims database; review supporting chart; conference with H. Murphy   | 1.00 |
| 11/22/17 | AGL | Revisions to reply re: motion to establish claims procedures; conferences with H. Murphy re: same (5.5)  | 5.00 |
| 11/22/17 | HBM | Telephone call with Huron (T. Martin) re: issues raised by class actions representative re: claims procedures; review chart re: same   | 0.80 |
| 11/22/17 | HBM | Prepare for and participate in telephone call with counsel for class action defendants re: objection by same to claims procedures motion; discussion of potential resolution; conference with C. Bennett and A. Lizotte re: same | 1.80 |
| 11/22/17 | HBM | Work on reply to objection by class rep to claims procedure motion; conference with A. Lizotte re: same  | 3.00 |
| 11/27/17 | AGL | Final changes to reply to objection to claims procedure motion; conference with H. Murphy, Huron, C. Bennett re: same; telephone conference with T. Martin re: ePOC mechanics; prepare for 11/28 hearing re: same                | 7.00 |
| 11/27/17 | CRB | Conference with H. Murphy and A. Lizotte regarding interplay of class action with claims procedures order  | 0.80 |
| 11/27/17 | HBM | Work on issues for preparation for tomorrow's hearing on claims motion; several conferences with A. Lizotte and Huron re: same; conference with C. Bennett re: same  | 1.80 |
| 11/27/17 | HBM | Work on issues re: participants objection to claims; conference with A. Lizotte re: same; revise latest draft of response to class rep's objection   | 2.30 |
| 11/28/17 | AGL | Revise notice of proposed claim allowance per Court request  | 0.20 |

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| 11/28/17 | AGL | Review Huron memo on net winner ePOC's   | 0.30 |
| 11/28/17 | AGL | Review Huron claim analysis for Esam; telephone conference with T. Martin re: same   | 0.60 |
| 11/28/17 | AGL | Telephone conference with I. Rona re: disputes on claims procedures; prepare for and attend hearing on claims procedures; telephone conference with Trustee re: same; meeting after hearing with trustee, Rona | 4.00 |
| 11/28/17 | HBM | 2 extended telephone class with Huron and Trustee re: issues raised by class representative, potential resolution and today's hearing  | 1.50 |
| 11/28/17 | HBM | Prepare for and attend hearing on claims procedures motion and meeting with trustee and Huron re: same before and after hearing  | 2.70 |
| 11/29/17 | HBM | Work on potential resolution of objection of class reps to claims procedure motion; outline potential agreement re: same   | 2.00 |
| 11/30/17 | AGL | Conferences with H. Murphy, C. Bennett re: amendments to claims procedure order, claims resolution issues  | 1.30 |
| 11/30/17 | CRB | Conference with H. Murphy and A. Lizotte regarding claims procedures and class action defendant issues   | 0.90 |
| 11/30/17 | HBM | Meeting with A. Lizotte re: outline proposed resolution of class reps and issues re: same  | 1.30 |
| 12/01/17 | AGL | Telephone conference with Tim Martin re: Rona objection to claim procedures, competing claims  | 0.50 |
| 12/01/17 | HBM | Emails to Huron and Trustee re: case status and issues re: claims  | 0.30 |
| 12/05/17 | AGL | Emails and telephone conferences with T. Martin, I Rona re: ePOC, net winner data for class defendants; review spreadsheets  | 0.70 |
| 12/06/17 | AGL | Telephone conferences and emails with Huron re: ePOC data for class  | 0.40 |
| 12/06/17 | AGL | Telephone conference with T. Martin re: claims reconciliation, competing claims of class defendants; work on procedural order  | 2.00 |
| 12/06/17 | HBM | Work on claims settlement issues and order   | 1.50 |
| 12/07/17 | AGL | Email from J. Sarondo re: ePOC database  | 0.20 |
| 12/07/17 | AGL | Review form of exhibit to use for competing User Account claims; telephone conference with trustee, Huron re: same; emails re: same, procedures  | 1.40 |
| 12/07/17 | HBM | Review and respond to lengthy email from Huron re: open issues re: potential resolution of objection by class action defendants; brief conference with A. Lizotte re: same                                     | 0.70 |
| 12/08/17 | AGL | Conference with C. Bennett re: claims objections/user account overlap  | 0.20 |

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| 12/11/17 | AGL | Email from P. Constantino re: claims status   | 0.10 |
| 12/11/17 | AGL | Emails from J. Sternklar re: Esam account aggregation;<br>review Huron analysis   | 0.40 |
| 12/11/17 | HBM | Telephone call with S. Darr re: case status and<br>tomorrow's meeting; brief conference with A. Lizotte re:<br>same   | 0.40 |
| 12/12/17 | AGL | Emails with T. Martin, P. Constantino re: claims register   | 0.20 |
| 12/12/17 | AGL | Follow up email from T. Martin re: Esam accounts  | 0.20 |
| 12/12/17 | AGL | Prepare for and attend meeting with trustee re: user<br>account reconciliation, contested claims procedures   | 3.00 |
| 12/12/17 | HBM | Prepare for and attend meeting with trustee and Huron<br>to develop procedure for net-winner re: allowance of<br>claims   | 2.20 |
| 12/13/17 | HBM | Work on outline of procedures re: net winners and<br>claims allowance resolution  | 1.50 |
| 12/14/17 | AGL | Work on portal for net winners to add User Accounts;<br>telephone conference with T. Martin re: same  | 0.60 |
| 12/14/17 | AGL | Work on status report re: claims procedures   | 1.00 |
| 12/14/17 | AGL | Draft letter to alleged net winners re: process for<br>claiming user accounts; conference with Huron re: same   | 1.50 |
| 12/14/17 | AGL | Work on revised proposed order for claims procedures<br>and accompanying exhibits; conference with H. Murphy  | 2.20 |
| 12/14/17 | HBM | Work on revisions to claims order; conference with A.<br>Lizotte re: same   | 1.50 |
| 12/15/17 | AGL | Further work on portal for net winners to assert interest<br>in User Accounts; emails re: same  | 0.50 |
| 12/15/17 | AGL | Work on proposed notice to net winners re: bar date for<br>user accounts  | 0.70 |
| 12/15/17 | AGL | Work on amended claims procedure order; conferences<br>with H. Murphy re: same  | 3.50 |
| 12/15/17 | HBM | Work on claims motion order and procedures; several<br>conferences with A. Lizotte re: same   | 2.00 |
| 12/18/17 | AGL | Prepare for and attend conference with Trustee, I. Rona<br>re: modified claims procedures; work on revised order,<br>status report  | 3.50 |
| 12/18/17 | HBM | Review and revise draft status report; conference with<br>A. Lizotte re: same   | 0.30 |
| 12/18/17 | HBM | Work on resolving objection of class representative to<br>claim motion; telephone call with trustee re: same;<br>telephone call with class representatives; review and<br>revise order re: same | 2.70 |
| 12/19/17 | AGL | Prepare for and attend continued hearing on motion to<br>approve claims procedures; conference with Huron re:<br>results of hearing   | 3.50 |
| 12/19/17 | HBM | Work on revisions to order; review proposed changes to<br>proposed order from class representatives; prepare for  | 3.30 |



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|          |     | and attend hearing on motion to appeal claims procedures; conference with trustee and Huron re: same                              |      |
| 12/20/17 | AGL | Emails with Jessica Pooler re: claims status  | 0.20 |
| 12/20/17 | AGL | Telephone conferences and emails with KCC, Huron re: process for examining register, review for potential administrative claims   | 0.70 |
| 12/20/17 | AGL | Analysis of net winner aggregation, notice issues for claims procedures; telephone conference with T. Martin, C. Bennett re: same | 1.00 |
| 12/20/17 | AGL | Work on claims procedure order; draft revisions to proposed form of notice to net winners; conference re: same                    | 1.50 |
| 12/20/17 | CRB | Review Order on claim procedures; edit; and conference  | 0.80 |
| 12/20/17 | CRB | Conference with A. Lizotte regarding claim procedures; and telephone conference with T. Martin regarding same                     | 1.90 |
| 12/21/17 | AGL | Telephone conference with Tim Martin re: search for administrative claims   | 0.20 |
| 12/21/17 | AGL | Emails with T. Martin re: portal to identify additional new accounts for winners  | 0.20 |
| 12/21/17 | AGL | Emails with KCC re: administrative claim review   | 0.20 |
| 12/21/17 | AGL | Further revisions to claims procedure order; conference with H. Murphy re: same; email to I. Rona                                 | 2.00 |
| 12/22/17 | AGL | Finalize and file claims procedure order and exhibits; draft supplement   | 1.40 |
| 12/26/17 | AGL | Review executed order on claims procedure; email to Huron re: same  | 0.30 |
| 12/26/17 | HBM | Conference with A. Lizotte re: claims order, etc.; email re: same   | 0.40 |
| 12/27/17 | AGL | Analysis of updated portal for net winners to input additional user accounts; meeting with Huron re: portal format, issues        | 1.50 |
| 01/04/18 | AGL | Telephone conference with T. Martin re: net winner user account portal, PIEC requests   | 0.30 |
| 01/05/18 | AGL | Work on revisions to net winner bar date notice; conference with H. Murphy  | 1.70 |
| 01/05/18 | HBM | Review and revise draft notice to participants; conference with A. Lizotte re: same   | 0.40 |
| 01/08/18 | AGL | Further work on net winner bar date notice; conference with T. Martin re: same  | 0.50 |
| 01/08/18 | AGL | Prepare for and attend call with BMC re: net winner bar date portal/notice  | 0.50 |
| 01/08/18 | HBM | Meeting with S. Darr re: case status, open issues, IRS tax issue, claims issues, etc.   | 0.80 |
| 01/10/18 | AGL | Conference with H. Murphy re: claim objections  | 0.30 |
| 01/10/18 | AGL | Review tax claims, Huron updated analysis re: same; telephone conference with T. Martin re: same; assemble                        | 2.50 |

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|          |     | data on administrative claim accruals  |      |
| 01/11/18 | AGL | Telephone conferences with memos with Huron re: net winner user account portal, issues                                       | 1.00 |
| 01/11/18 | CRB | Review with A. Lizotte   | 0.40 |
| 01/17/18 | AGL | Review updates on proposed net winner user account portal; conference call with BMC  | 1.00 |
| 01/18/18 | CEW | Finalize comparison between docket and PEIC filings; incorporate findings into spreadsheet for attorney use                  | 1.10 |
| 01/23/18 | AGL | Telephone conference with T. Martin re: net winner portal issues   | 0.20 |
| 01/24/18 | AGL | Telephone conference with J. Sternklar re: Esam net winner claim   | 0.20 |
| 01/24/18 | AGL | Prepare for/attend call with BMC re: status of net winner portal   | 1.00 |
| 01/26/18 | AGL | Emails with J. Pooler, Trustee re: claims, distribution update   | 0.20 |
| 01/30/18 | AGL | Telephone conference with T. Martin re: net winner portal; work on latest revisions  | 0.80 |
| 01/31/18 | AGL | Review updated net winner portal; telephone conference with T. Martin  | 0.30 |
| 02/01/18 | AGL | Review revisions to net winner portal  | 0.20 |
| 02/05/18 | AGL | Telephone conference with T. Martin re: net winner portal issues   | 0.20 |
| 02/06/18 | AGL | Emails with Huron re: claim objection parameters; prepare for Chelsea Collaborative claims meeting                           | 0.50 |
| 02/06/18 | AGL | Prepare for and attend meeting with trustee, Huron re: net winner claim portal, notice; work on revisions                    | 2.00 |
| 02/06/18 | HBM | Meeting with trustee and Huron to review notices and screen shots re: net winner portal and claims order; revisions re: same | 1.70 |
| 02/07/18 | AGL | Telephone conference with T. Martin re: claims objections issues   | 0.20 |
| 02/07/18 | AGL | Telephone conferences and emails with trustee, T. Martin re: claim register; review draft register                           | 1.00 |
| 02/07/18 | HBM | Review issues and proposed form and text of claims registry; conference with A. Lizotte; email re: same                      | 1.00 |
| 02/08/18 | AGL | Telephone conference with Trustee re: 2/9 community meeting  | 0.20 |
| 02/08/18 | AGL | Emails with T. Martin, BMC re: claims register; work on introduction for register  | 0.80 |
| 02/09/18 | AGL | Prepare for and attend claims, case meeting in Chelsea   | 4.00 |
| 02/12/18 | AGL | Telephone conference/emails re: closure of ePOC portal   | 0.30 |
| 02/12/18 | AGL | Conference with C. Bennett, H. Murphy re: results of Chelsea meeting; telephone conference with T. Martin re: same           | 0.40 |
| 02/14/18 | AGL | Prepare for and attend call with I. Rona re: net winner  | 1.00 |



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|          |     | portal   |      |
| 02/14/18 | HBM | Participate in telephone call with counsel for class defendants re: net winner portal and screen shots and notice; multiple conferences with A. Lizotte, trustee and Huron | 0.90 |
| 02/15/18 | AGL | Review I. Rona changes to net winner portal; telephone conference with T. Martin re: same  | 0.30 |
| 02/20/18 | AGL | Review portal for claims registry before going live; conference with Huron re: same; emails re: corrections  | 1.00 |
| 02/21/18 | AGL | Telephone conference and emails with T. Martin re: net winner portal status; email to I. Rona re: same   | 0.30 |
| 02/21/18 | HBM | Telephone call with trustee re: claims process for net winner and issues re: same  | 0.20 |
| 02/27/18 | CRB | Review and edit sur-reply brief; and conference with A. Lizotte regarding revisions  | 2.10 |
| 02/28/18 | AGL | Telephone conference with T. Martin re: claim registry, net winner portal; telephone conference with Trustee re: claims review   | 0.30 |
| 02/28/18 | AGL | Work on edits to net winner portal; conference with Huron  | 0.80 |
| 03/01/18 | DMR | Reviewed recently filed Trustee's response to defendants' opposition to proposed findings  | 0.40 |
| 03/01/18 | DMR | Reviewed draft of T. Martin report and analysis of same  | 1.40 |
| 03/02/18 | AGL | Work on further revisions to net winner portal; telephone conference with J. Sorondo re: same  | 0.60 |
| 03/05/18 | AGL | Review/revise proposed net winner portal; telephone conference and email to Trustee re: same   | 1.00 |
| 03/06/18 | AGL | Review KCC memo re: categories of unprocessed claims; search docket re: KCC retention issues; telephone conference with J. Miller re: administrative claim issues          | 1.00 |
| 03/07/18 | AGL | Telephone conference with trustee re: claims register  | 0.20 |
| 03/07/18 | AGL | Conference with M. Spanos re: administrative claim review; memo to trustee re: process for evaluating administrative claims  | 1.00 |
| 03/08/18 | AGL | Telephone conference with T. Martin re: claims objection, net winner portal  | 0.20 |
| 03/09/18 | AGL | Review claims procedure order; emails; telephone conference with BMC, Huron re: misfiled participant ePOC claim issues, opportunity to fix                                 | 1.20 |
| 03/12/18 | AGL | Review new proof of claim filed with Court; emails with KCC re: claim monitoring issues; telephone conference with trustee re: portal status                               | 0.50 |
| 03/13/18 | AGL | Emails to BMC re: net winner portal  | 0.20 |
| 03/14/18 | AGL | Emails with BMC, T. Martin re: net winner portal edits, translations   | 0.20 |

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| 03/14/18 | AGL | Meeting with T. Martin re: claims objection overview;<br>review power point re: same  | 2.20 |
| 03/15/18 | AGL | Review/revise notices for net winner portal, standard<br>ePOC correction portal; prepare for and attend<br>conference call with BMC re: final adjustments to<br>portal, notices | 1.40 |
| 03/16/18 | AGL | Emails with H. Exambcra re: claim status  | 0.20 |
| 03/16/18 | AGL | Conference with Huron, BMC re: claims register  | 0.20 |
| 03/19/18 | AGL | Emails re: opening of claims registry, net winner portal,<br>standard ePOC portal; telephone conference with<br>Trustee re: same  | 0.40 |
| 03/21/18 | AGL | Emails with BMC, Huron re: returned emails on portal,<br>next steps   | 0.20 |
| 03/21/18 | AGL | Prepare for and attend conference call with Huron re:<br>continued analysis of disputed claims; review exhibits   | 1.60 |
| 03/28/18 | MKO | Review memos and research re: claims procedure order;<br>memo to A. Lizotte re: same  | 0.70 |
| 03/30/18 | AGL | Emails with defendant class re: net winner portal   | 0.10 |

| <u>Attorney</u>         | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-------------------------|--------------|-------------|---------------|
| ANDREA G. BRIER         | 2.80         | 410.00      | 1,148.00      |
| ANDREW G. LIZOTTE       | 214.40       | 595.00      | 127,568.00    |
| ANDREW G. LIZOTTE       | 36.40        | 615.00      | 22,386.00     |
| CHARLES R. BENNETT, JR. | 10.20        | 625.00      | 6,375.00      |
| CHRISTINE E. WILKINS    | 1.10         | 225.00      | 247.50        |
| DANIEL M. RABINOVITZ    | 1.80         | 550.00      | 990.00        |
| HAROLD B. MURPHY        | 79.40        | 625.00      | 49,625.00     |
| MICHAEL K. O'NEIL       | 21.90        | 345.00      | 7,555.50      |
| MICHAEL K. O'NEIL       | 0.70         | 360.00      | 252.00        |

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| <b>Total Fees</b> | <b>\$216,147.00</b> |
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EXHIBIT D

SERVICES RELATING TO CLASS ACTION LITIGATION

| <u>Date</u> | <u>Atty</u> | <u>Description</u>  | <u>Hours</u> |
|-------------|-------------|---|--------------|
| 03/02/17    | CRB         | Review and finalize the Rule 26 response  | 0.40         |
| 03/02/17    | TJF         | Review incoming Article 6 certificates from Spain, Portugal   | 1.00         |
| 03/03/17    | AGL         | Finalize and file class action 26F Stipulation  | 0.30         |
| 03/06/17    | AGL         | Telephone conference with F. Morrissey re: foreign class counsel issues   | 0.20         |
| 03/06/17    | CEW         | Draft certificate of service for P. Lamera; conference with A. Lizotte re: same; conference with P. Moniello re: filing same; update foreign defendant service chart with certificate of service filing dates and answer date for P. Lamera   | 0.30         |
| 03/07/17    | AGL         | Draft motion to amend class action pretrial order; email to I. Rona re: same  | 0.70         |
| 03/08/17    | CEW         | Telephone conference with Bankruptcy Court re: sign and stamp summonses and Hague Summaries with updated addresses; travel to Bankruptcy Court to obtain same; conference with Canon Business re: copying and scanning same for re-service  | 0.90         |
| 03/09/17    | HBM         | Review recent article re: Net winner; conference with A. Lizotte re: same; email re: same   | 0.40         |
| 03/10/17    | AGL         | Review Ampal decision on foreign jurisdiction   | 0.20         |
| 03/10/17    | CEW         | Review documents received from Spain; conference with T. Folkman re: same; scan and forward same to translators re: translation of documents needed; update hard copy files of defendants; organize pleadings for re-service; review email from S. Nicholas re: translation costs; research translation costs for prior jobs; email S. Nicholas back re: same | 1.70         |
| 03/13/17    | CEW         | Forward certificate of service for R. Zapata La O to translator for estimate; update Hague Summaries and addresses in Portuguese and Spanish for defendants for re-service; copy same and assemble documents for re-service to Spain and Portugal   | 1.30         |
| 03/15/17    | CEW         | Print translation to include with certificate of service; draft certificate of service and assemble same with original and translation for attorney review  | 0.40         |

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| 03/17/17 | AGL | Review answer filed by E. Otilia in Madrid  | 0.20 |
| 03/22/17 | AGL | Conference with C. Bennett re: class action status  | 0.20 |
| 03/22/17 | CEW | Review documents received from Ontario, Canada re: service on G. Randhawa; draft certificate of service for attorney review   | 0.20 |
| 03/23/17 | AGL | Prepare for and attend conference call with F. Morrissey re: foreign class action, jurisdiction issues  | 0.50 |
| 03/23/17 | CEW | Telephone conference with Bankruptcy Court re: documents received from Italy  | 0.10 |
| 03/23/17 | CRB | Telephone conference re: foreign class action counsel - F. Morrissey and B. Lovett; and telephone conference with T. Martin re: Proof of Claim by class representative  | 0.60 |
| 03/23/17 | MKO | Review order appointing class counsel and certifying class re: expert and counsel fee carve out   | 0.40 |
| 03/24/17 | AGL | Prepare for and attend conference call with I. Rona re: domestic class actions, class proofs of claim   | 0.60 |
| 03/24/17 | CEW | Review documents returned from Spain re: determine if service was effected on defendants  | 0.70 |
| 03/24/17 | CRB | Conference with I. Rona re: status and expert fee   | 0.40 |
| 03/27/17 | CEW | Update foreign defendant service chart re: filing dates for certificates of service and answer dates; conference with A. Lizotte re: Wanzeler case and certificate of service for G. Randhawa; update hard copy files with certificates of service; forward returns from Spain to translator for estimates of cost and time; emails with translator re: same  | 1.00 |
| 03/28/17 | CEW | Telephone conference with Bankruptcy Court re: retrieval of documents from Italian Central Authority; coordinate retrieval of same with Canon Business; travel to Bankruptcy Court to retrieve same; review documents sent from Italian Central Authority re: determine if service was effected on defendants   | 1.50 |
| 03/29/17 | CEW | Retrieve amended complaint for domestic and foreign actions; compute number of defendants in each action, including those named in amended suits; forward results to attorney for review  | 0.50 |
| 03/30/17 | AGL | Conference with C Wilkins re: foreign service issues  | 0.20 |
| 03/30/17 | CEW | Retrieve answer from docket re: De. Mencia; print and organize translations for certificates of service for defendants in Spain; draft certificates of service and assemble original service documents with translations for attorney review; conference with A. Lizotte re: same; update foreign defendant service chart re: answer and service dates; telephone conference with M. Hussey re: answer from A. Rivas and retrieval of documents sent from Italy; conference with Canon re: same | 0.80 |

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| 03/31/17 | AGL | Telephone conference with I. Rona re: answer extensions in foreign action; review motion to extend answer date   | 0.30 |
| 04/03/17 | AGL | Review motions to dismiss foreign action and memoranda   | 0.30 |
| 04/03/17 | AGL | Conference with F. Morrissey, C. Bennett re: foreign class counsel; review motion to extend answer deadlines   | 0.30 |
| 04/04/17 | CRB | Telephone conference with T. Martin re: information re: foreign defendant contacts to respond to motion to dismiss for lack of personal jurisdiction   | 0.20 |
| 04/05/17 | AGL | Conference with C. Bennett, T. Martin re: objection to motion to dismiss foreign action  | 0.30 |
| 04/05/17 | CEW | Telephone conference with M. Hussey re: documents received from Italy; retrieve answers from docket; retrieve certificates of service effected in Great Britain from docket; update foreign defendant service chart re: same | 0.40 |
| 04/06/17 | AGB | Conference with C. Bennett, A. Lizotte re: Telex reply to MTD scheduling logistics   | 0.10 |
| 04/06/17 | AGL | Review answer filed by R. Hermida  | 0.20 |
| 04/06/17 | AGL | Review memo from T. Martin re: foreign defendant contacts with US; conference with C. Bennett re: same   | 0.60 |
| 04/06/17 | CEW | Review email from A. Lizotte re: answer filed; organize electronic versions of answers; update foreign defendant service chart and hard copies of files  | 1.40 |
| 04/06/17 | CRB | Conference with A. Brier re: foreign defendants' motion to dismiss and response  | 0.20 |
| 04/07/17 | AGL | Telephone conference with F. Morrissey re: extension of time to respond to motion to dismiss   | 0.20 |
| 04/10/17 | AGL | Work on additional information request for MTD - foreign; conference with C. Bennett, T. Martin re: same   | 0.70 |
| 04/10/17 | CRB | Conference with A. Lizotte regarding foreign class action, motion to dismiss, personal jurisdiction and facts  | 0.20 |
| 04/11/17 | AGL | Draft motion to extend response deadlines in foreign action MTD; review docket   | 0.60 |
| 04/11/17 | CEW | Review and google translate numerous return of documents from Spain re: determine if defendants have been served; note those for translation and others who need additional information re: insufficient addresses           | 2.60 |
| 04/12/17 | AGL | Conference with C. Wilkins re: foreign service issues  | 0.20 |
| 04/12/17 | AGL | Begin drafting trustee affidavit re: opposition to motions to dismiss  | 2.50 |
| 04/12/17 | CEW | Review email from A. Lizotte re: iPayout corporate filings; retrieve and print same from Florida Secretary of State for attorney review; conference with A. Lizotte re: service on Spanish defendants; draft certificate of  | 0.70 |

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|          |     | service for D. Souza; conference with A. Lizotte re: same; conference with Canon Business re: arrange for retrieval of documents from Bankruptcy Court  |      |
| 04/13/17 | AGL | Additional work on trustee affidavit in support of opposition to motions to dismiss; work with T. Martin, C. Wilkins on exhibits  | 2.80 |
| 04/13/17 | CEW | Review S. Darr affidavit re: corporate addresses needed; retrieve secretary of state filings for same; conference with A. Lizotte re: Linkpoint; continue to research Linkpoint and its iterations; retrieve documents from California Secretary of State's Office re: corporate filing; incorporate address from same into affidavit   | 1.50 |
| 04/13/17 | CEW | Update foreign defendant service chart re: defendants served in Spain; review additional documents received from Spain; review and forward certificates of service to translators for estimate; update hard copy files  | 1.60 |
| 04/14/17 | CEW | Telephone conference with M. Hussey re: answer filed by defendant in Spain; update foreign defendant service chart re: same and documents returned from Canada  | 0.40 |
| 04/18/17 | AGB | Discussions with A. Lizotte re: additional factual evidence in support of opposition to foreign defendants' Motion to Dismiss   | 0.30 |
| 04/18/17 | AGB | Begin draft of legal memorandum in support of opposition to foreign defendants' Motion to Dismiss   | 1.80 |
| 04/18/17 | AGL | Conference with C. Wilkins re: foreign service - Canada   | 0.10 |
| 04/18/17 | AGL | Draft motion to reschedule hearings on default judgment; motions to dismiss; email to C. Bennett re: same   | 0.80 |
| 04/18/17 | AGL | Telephone conference and emails with A. Brier, Huron re: opposition to motion to dismiss in foreign action; work on supporting exhibit to affidavit   | 0.80 |
| 04/18/17 | CEW | Review documents received from Spain re: service; draft certificate of service for defendant in Canada; conference with A. Lizotte re: same and Spanish documents to be translated; update foreign defendant service chart with service and answer dates; update answer chart; emails with translator re: estimates of translations for certificates of service received from Spain | 0.90 |
| 04/19/17 | AGB | Discussion of Telex opposition to foreign defendants' motion to dismiss with A. Lizotte   | 0.10 |
| 04/19/17 | AGB | Draft e-mail to D. McCormack at Huron re. screenshots of Telexfree website  | 0.30 |
| 04/19/17 | AGB | Teleconference with A. Lizotte and Huron re. additional factual materials for submission in connection with opposition to foreign defendants' Motion to Dismiss   | 0.30 |

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| 04/19/17 | AGB | Review of Promoter "Contracts"  | 0.50 |
| 04/19/17 | AGL | Telephone conference with F. Morrissey re: jurisdiction dispute; email to Morrissey re: 4007 AP scheduling issues; email to I. Rona re: same; telephone conference with trustee re: same  | 0.60 |
| 04/19/17 | AGL | Telephone conference and emails with Huron, A. Brier re: foreign participant contacts   | 0.80 |
| 04/19/17 | CEW | Update foreign service defendant chart re: filing of certificates of service and status of defendants whose documents were returned unserved; update hard copy files re: defendants in Spain; email D. McCormack re: updated addresses for same | 1.40 |
| 04/20/17 | AGB | Teleconference with D. McCormack re. mechanics of i-payout direct transfers   | 1.00 |
| 04/20/17 | AGB | Attention to drafting opposition to foreign defendants' motion to dismiss   | 3.80 |
| 04/20/17 | AGL | Telephone conference with S. Martin re: IPayout information to Atty. Silverberg re: same  | 0.20 |
| 04/20/17 | AGL | Work on affidavit re: motions to dismiss 4007; emails with Huron re: additional documents   | 1.60 |
| 04/20/17 | CEW | Print translations of service on Spanish defendants; draft certificates of service for same; organize and assemble original and translations of service for each defendant for attorney review; conference with P. Moniello re: same            | 0.90 |
| 04/21/17 | AGB | Discuss status of opposition to foreign defendants' motion to dismiss with A. Lizotte   | 0.20 |
| 04/21/17 | AGB | Teleconference with A. Lizotte and D McCormack re. factual support for opposition to foreign defendants' motion to dismiss  | 0.40 |
| 04/21/17 | AGB | Further attention to drafting opposition to foreign defendants' motion to dismiss with A. Lizotte   | 3.60 |
| 04/21/17 | AGL | Telephone conference with government re: evidence of participant contacts with USA; conference with Huron, A. Brier re: same  | 0.80 |
| 04/21/17 | AGL | Analysis of judgments, pleadings in Zeek case, foreign jurisdiction issues  | 2.00 |
| 04/24/17 | AGB | Teleconference with Huron re. factual support for opposition to foreign defendants' motion to dismiss   | 0.50 |
| 04/24/17 | AGB | Attention to drafting opposition to foreign defendants' motion to dismiss   | 6.00 |
| 04/24/17 | AGL | Revise omnibus scheduling motion in class action; conference with C. Bennett re: class representation issues  | 0.40 |
| 04/24/17 | AGL | Work on opposition to motion to dismiss and supporting affidavit; emails to Huron, A. Brier, government re:   | 1.50 |



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| 04/24/17 | CRB | same; research supporting law<br>Conference with A. Lizotte regarding proposed class<br>counsel for foreign litigation   | 0.30  |
| 04/25/17 | AGB | Revise Darr Affidavit and compile exhibits thereto per<br>request of A. Lizotte, for review by S. Darr   | 0.70  |
| 04/25/17 | AGB | Attention to drafting opposition to foreign defendants'<br>motion to dismiss   | 1.00  |
| 04/25/17 | AGB | Attention to drafting opposition to foreign defendants'<br>motion to dismiss and Affidavit of Andrea G.<br>Brier/Exhibits in connection therewith  | 6.00  |
| 04/25/17 | AGL | Review proposed motions in foreign action to appoint<br>class rep and counsel; retrieve prior class counsel order;<br>memo to trustee re: same   | 0.80  |
| 04/25/17 | AGL | Review draft opposition to motions to dismiss and<br>potential exhibits; meeting with A. Brier re: same  | 3.00  |
| 04/25/17 | CEW | Conference with P. Moniello re: certificates of service;<br>update foreign defendant service and answer charts;<br>update hard copy files with same; scan and forward<br>certificates in Spanish to translator for estimate; update<br>foreign defendant service chart with returns of<br>successful service on defendants | 2.50  |
| 04/25/17 | CRB | Conference re: response to foreign defendants' motion to<br>dismiss; and conference to address I. Rona's motion for<br>designation as class representative   | 0.40  |
| 04/26/17 | AGB | Continued attention to drafting opposition to foreign<br>defendants' motion to dismiss and collaborating with D.<br>McCormack and others at Huron re. factual questions<br>and evidence to be submitted in support   | 6.80  |
| 04/26/17 | AGL | Review Rona motion to extend response date - 4007<br>action  | 0.20  |
| 04/26/17 | AGL | Telephone conference with F. Morrissey re: status of<br>foreign class counsel  | 0.30  |
| 04/26/17 | AGL | Additional drafting/revisions to opposition to motions to<br>dismiss - foreign action; work on supporting affidavits<br>and exhibits   | 5.00  |
| 04/26/17 | HBM | Review and revise opposition to motion to dismiss;<br>conference with A. Lizotte and C. Bennett re: same   | 1.80  |
| 04/27/17 | AGB | Continued attention to revising draft opposition to<br>foreign defendants' motion to dismiss; collaborating<br>with D. McCormack and others at Huron re: factual<br>questions and evidence to be submitted in support  | 14.00 |
| 04/27/17 | AGL | Work on revised draft of opposition to MTD   | 0.50  |
| 04/27/17 | AGL | Assist with Brier affidavit, Darr affidavit re: opposition<br>to motions to dismiss; conference with S. Darr re: same  | 1.00  |
| 04/27/17 | CEW | Review email from translator re: translations of returns<br>of service received from Spain; draft certificate of   | 0.40  |



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|          |     | service and assemble all translations for attorney review; conference with P. Moniello re: same; email A. Lizotte re: state identification numbers   |      |
| 04/28/17 | AGB | Draft and arrange for filing of Assented-to Motion to Extend Deadline for Response   | 0.30 |
| 04/28/17 | AGB | Meet with C. Bennett to review draft of opposition to foreign defendants' motion to dismiss  | 1.00 |
| 04/28/17 | AGB | Continued attention to drafting opposition to foreign defendants' motion to dismiss and collaborating with D. McCormack and others at Huron re. factual questions and evidence to be submitted in support  | 9.70 |
| 04/28/17 | AGL | Work on revised opposition to motion to dismiss; conference with C. Bennett, A. Brier re: same   | 2.00 |
| 04/28/17 | CRB | Review reply brief on jurisdiction; conference with A. Brier regarding edits   | 0.80 |
| 05/01/17 | AGL | Analysis and provide comments on updated opposition to motions to dismiss  | 2.00 |
| 05/02/17 | AGB | Meet with H. Murphy for final comments to Opposition to MTD  | 0.20 |
| 05/02/17 | AGB | Meet with A. Lizotte re. final comments to Opposition to MTD   | 0.30 |
| 05/02/17 | AGL | Review notice of bankruptcy from Arellano - 4006 action; draft notice to court   | 0.30 |
| 05/02/17 | AGL | Conferences with H. Murphy, A. Brier re: edits to opposition to motion to dismiss  | 0.80 |
| 05/02/17 | CEW | Conference with Canon Business re: retrieval of documents from Bankruptcy Court; conference with Clerk's Office re: same; redact original and translated copies of certificates of service retrieved from Spain; revise certificate of service and assemble redacted originals and translations for attorney review; conference with A. Lizotte re: same; review docket re: answer recently filed; update foreign defendant service chart re: same | 1.00 |
| 05/02/17 | HBM | Review and revise opposition to motion to dismiss; conference with A. Lizotte re: same   | 1.50 |
| 05/03/17 | AGB | Teleconference with D. McCormack re. final comments on Darr affidavit  | 0.10 |
| 05/03/17 | AGB | Revisions to Darr affidavit to conform to final version of MTD Opp.  | 0.20 |
| 05/03/17 | AGB | Revise TelexFree Opposition to MTD per H. Murphy comments  | 0.30 |
| 05/03/17 | AGB | Complete revision of Trustee's Opposition to MTD of Foreign Defendants   | 1.00 |
| 05/03/17 | AGB | Final proofread of TelexFree Opp. to MTD   | 1.20 |
| 05/03/17 | AGL | Review answer filed by B. Munoz  | 0.20 |

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| 05/03/17 | HBM | Final review and revisions to Telexfree opposition  | 0.70 |
| 05/04/17 | AGB | Finish prepping Telex papers for filing   | 0.80 |
| 05/04/17 | AGL | Final review of opposition to motion to dismiss;<br>conference with A. Brier re: same   | 0.50 |
| 05/04/17 | CEW | Update files re: documents received from Italy; review<br>additional documents received from Italy to determine if<br>service was effected                      | 1.70 |
| 05/05/17 | CEW | Continue to review documents received from Italy to<br>determine if service was effected; organize and file<br>same   | 3.30 |
| 05/09/17 | AGB | Discuss new research assignment with A. Lizotte (re.<br>personal jurisdiction in class actions)   | 0.20 |
| 05/09/17 | AGB | Begin review of Newberg on Class Actions re. Personal<br>Jurisdiction and   | 0.30 |
| 05/09/17 | AGB | Review new set of pleadings re. MTD and class<br>certification/appointment of Defendant Class<br>representative   | 0.50 |
| 05/09/17 | AGB | Continue research re. Class Actions and<br>necessity/manner of establishing Personal Jurisdiction   | 2.00 |
| 05/09/17 | AGL | Review Puzzarini motion to dismiss foreign action;<br>conference with trustee re: same; conference with C.<br>Bennett, A. Brier, re: class wide on jurisdiction | 2.00 |
| 05/10/17 | AGB | Teleconference with D. McCormack re. data to support<br>new opposition to MTD   | 0.10 |
| 05/10/17 | AGB | Discuss TelexFree research with C. Bennett and A.<br>Lizotte  | 0.50 |
| 05/10/17 | AGB | Telex research: review and analysis of cases pulled re.<br>personal jurisdiction in defendant class action context  | 2.00 |
| 05/10/17 | AGB | Continue review and analysis of cases pulled re.<br>personal jurisdiction in defendant class action context   | 2.50 |
| 05/10/17 | AGL | Telephone conference with F. Morrissey re: designation<br>of class representation   | 0.20 |
| 05/10/17 | AGL | Meeting with C. Bennett, A. Brier re: outline of<br>response to Rona motion to dismiss; legal research re:<br>same  | 0.50 |
| 05/10/17 | AGL | Review Rona motion to designate class rep and appoint<br>counsel; examine certification order in domestic action  | 0.60 |
| 05/10/17 | CRB | Class Action on personal jurisdiction   | 0.40 |
| 05/11/17 | AGB | Discuss TelexFree response to MTD/Class<br>Certification/Class Representative pleadings with A.<br>Lizotte  | 0.30 |
| 05/11/17 | AGL | Legal research re: jurisdiction over foreign defendants;<br>draft outline re: same  | 2.00 |
| 05/11/17 | CRB | Brief conference regarding jurisdiction issue   | 0.20 |
| 05/11/17 | CRB | Meeting with Trustee and Huron representative to<br>review jurisdictional issues associated with foreign class  | 0.40 |

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| 05/12/17 | AGL | Conferences with F. Morrissey, I Rona re: pending motions for class certification, dismissal on jurisdiction; draft memo re: same; draft omnibus motion to alter motion calendar  | 2.50 |
| 05/12/17 | CRB | Conference call with I. Rona re: foreign class action, class representative and jurisdictional issues   | 0.30 |
| 05/12/17 | CRB | Telephone conference with F. Morrissey re: personal jurisdiction issue  | 0.30 |
| 05/15/17 | AGL | Review orders in foreign class action; telephone conference to clerk re: same   | 0.20 |
| 05/16/17 | AGL | Emails with court re: 4007 calendar; review and serve hearing notice on class certification   | 0.30 |
| 05/19/17 | AGL | Review email folder for A. Brier - jurisdiction dispute   | 0.20 |
| 05/22/17 | AGL | Conference with C. Bennett re: response to Puzzarini motion to dismiss; email to A. MacIver re: same; research jurisdiction ruling on class wide basis; review Puzzarini Telex activity; meeting with MacIver re: same  | 2.00 |
| 05/22/17 | ALM | Discuss motion to dismiss for lack of jurisdiction with A. Lizotte; review materials from Huron with A. Lizotte; review documents relevant to response to motion to dismiss (amended complaint, motion to dismiss, research completed by A. Brier and response to motion to dismiss relating to other defendants) | 3.50 |
| 05/24/17 | ALM | Research and draft response to Puzzarini's motion to dismiss for lack of jurisdiction / class jurisdiction  | 5.10 |
| 05/24/17 | HBM | Review pleadings in MDL; conference with A. Lizotte re: issues and strategy re: same  | 0.40 |
| 05/24/17 | MKO | Review order on motion to dismiss; email to team re: same   | 0.20 |
| 05/25/17 | ALM | Research for objection of motion to dismiss for personal jurisdiction   | 5.10 |
| 05/26/17 | ALM | Research re: minimum contacts of internet-based companies   | 1.30 |
| 05/30/17 | ALM | Research and draft response to Puzzarini's motion to dismiss on behalf of the defendant class   | 4.70 |
| 05/31/17 | AGL | Review new decision on service on foreign defendants  | 0.20 |
| 05/31/17 | ALM | Research re: personal jurisdiction as defense for entire defendant class  | 3.80 |
| 06/01/17 | AGL | Review issues in foreign class certification, motion to dismiss; conference with C. Bennett re: same  | 0.40 |
| 06/01/17 | AGL | Review draft motion to alter service on foreign class defendants; conference with T. Folkman, C. Wilkins re: same   | 0.50 |
| 06/01/17 | ALM | Draft affidavit of S. Darr (in support of opposition to proposed class representative's motion to dismiss)  | 1.30 |

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| 06/01/17 | CEW | Conference with T. Folkman and A. Lizotte re: service on foreign defendants by mail; conference with Canon Business re: logistics and cost of same  | 0.60 |
| 06/02/17 | ALM | Research and drafting response to Puzzarini's motion to dismiss   | 2.40 |
| 06/04/17 | ALM | Draft response to Puzzarini's motion to dismiss (on behalf of the proposed class)   | 2.50 |
| 06/05/17 | AGL | Review terms of class action discovery plan   | 0.30 |
| 06/05/17 | ALM | Draft and edit response to Puzzarini's motion to dismiss (on behalf of proposed class) and draft affidavit of S. Darr; sent to A. Lizotte for review  | 4.40 |
| 06/06/17 | AGL | Prepare for and attend call with I Rona re: domestic class action discovery plan  | 0.50 |
| 06/06/17 | AGL | Work on opposition to Puzzarini motion to dismiss; conference with C. Bennett re: same  | 2.80 |
| 06/06/17 | CRB | Telephone conference with I. Rona re: Puzzarini motion to dismiss and class representative designation; and follow-up email   | 0.80 |
| 06/06/17 | CRB | Review and edit opposition to M. Puzzarini motion to dismiss for lack of jurisdiction; and conference with A. Lizotte regarding same  | 2.40 |
| 06/07/17 | AGL | Email to T. Martin re: I Rona data requests   | 0.20 |
| 06/07/17 | AGL | Draft revisions to opposition to Puzzarini motion to dismiss; work on exhibits; revise trustee affidavit; telephone conference with trustee   | 3.20 |
| 06/07/17 | CRB | Review and final edits to Trustee's opposition to Puzzarini's motion to dismiss   | 0.80 |
| 06/09/17 | AGL | Further revisions to opposition to Puzzarini motion to dismiss  | 0.80 |
| 06/12/17 | AGL | Emails from T. Martin re: documents produced to Stoneturn   | 0.20 |
| 06/12/17 | AGL | Begin drafting trustee response to Puzzarini motion to designate in class action  | 2.00 |
| 06/12/17 | CEW | Review documents received from Italy, Spain and Germany re: determine if service was effected on various defendants   | 1.90 |
| 06/12/17 | CRB | Review and edit Trustee's objection to foreign class designation  | 0.20 |
| 06/13/17 | AGL | Edits to opposition to Puzzarini motion to dismiss  | 0.30 |
| 06/13/17 | CEW | Continue to review documents received from Italy re: determine if service was effected on various defendants  | 1.00 |
| 06/14/17 | AGL | Work on opposition to Puzzarini motion to dismiss   | 0.20 |
| 06/14/17 | CEW | Conference with A. Lizotte re: certificates of service for defendants; draft certificate of service for L. Volker for attorney review; continue to review documents received from Italy re: determine whether service was effected on | 1.90 |

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|          |     | various defendants; emails to Morningstar Translations re: invoices  |      |
| 06/15/17 | AGL | Telephone conference with trustee re: Puzzarini motion to dismiss; work on revisions to opposition and exhibits  | 2.00 |
| 06/16/17 | AGL | Finalize and file opposition to Puzzarini motion to dismiss and motion to designate; meeting with trustee re: affidavit; begin preparing for hearing   | 1.50 |
| 06/16/17 | CRB | Preliminary outline for hearing on the motion to dismiss as relates to the foreign class action defendants   | 2.60 |
| 06/16/17 | MXC | Prepare binder for hearing   | 1.00 |
| 06/19/17 | AGL | Review recent decision on extraterritorial transfers   | 0.30 |
| 06/19/17 | AGL | Conference with C. Bennett re: standards for personal jurisdiction; assemble documents for 6/21 hearings; begin preparing for hearing  | 0.70 |
| 06/19/17 | ANM | Conference with C. Bennett re: court hearing on 6/21/2017; analyze recent motions and objections relative to jurisdiction; draft and finalize summary of transactions and contract between all defendants and selected defendants; | 4.50 |
| 06/19/17 | CRB | Conference with A. Mazzearella re: chalk for hearing on jurisdiction motion  | 0.30 |
| 06/19/17 | CRB | Review chart of defendant contacts in preparation for hearing on motion to dismiss   | 1.10 |
| 06/19/17 | CRB | Review case law re: reasonableness measured by contact to determine personal jurisdiction  | 1.40 |
| 06/19/17 | SL  | Meeting with C. Bennett; research re: purposeful availment and related issues for hearing  | 4.30 |
| 06/20/17 | AGL | Review and consider Morrissey reply to opposition to motion to dismiss and objection to Puzzarini motion to designate; review argument summaries; telephone conference with court re: defendant inquiries                          | 1.50 |
| 06/20/17 | CRB | Prepare for hearing; review reply memorandum; and edit chart   | 1.40 |
| 06/21/17 | AGL | Prepare for/attend hearings on motions to dismiss, motion to designate class, and default judgment; telephone conference with T. Martin re: Ympactus records; telephone conference with Trustee re: hearing results                | 3.70 |
| 06/21/17 | CRB | Prepare for and attend hearing regarding motion to dismiss   | 3.40 |
| 06/21/17 | HBM | Conference with C. Bennett before and after hearing; emails re: same   | 0.60 |
| 06/23/17 | CEW | Update hard copy filed and foreign defendant spreadsheet; review documents received from Spain re: determine whether service was effected on defendants; review documents received from Brazil re: N. Santos                       | 1.50 |

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| 06/26/17 | AGL | Conference with C. Wilkins re: Italian service issues   | 0.20 |
| 06/26/17 | AGL | Review Rona motion to extend expert report deadlines;<br>email to Huron re: same  | 0.30 |
| 06/26/17 | CEW | Update hard copy files; review returns from Italy re:<br>determine if service was effected; update foreign<br>defendant service chart   | 2.40 |
| 06/27/17 | CEW | Review returns from Italy re: Darr v. Alecci to<br>determine whether service effected; update foreign<br>defendant service chart and hard copy files  | 1.00 |
| 06/27/17 | CEW | Continue to review documents received from Brazil re:<br>Darr v. Wanzeler to determine whether N. Santos Reis<br>received filings; conference with T. Folkman re: same  | 1.50 |
| 06/27/17 | CRB | Review motion to amend discovery schedule re: expert<br>disclosures; and email I. Rona  | 0.30 |
| 06/28/17 | CEW | Organize all documents from Italy for further review by<br>attorney; update foreign defendant service chart;<br>conference with Canon Business re: green cards<br>received from Italy; travel to Bankruptcy Court to<br>retrieve additional documents from Italy; review same<br>to determine if service was effected | 3.10 |
| 06/29/17 | AGL | Conference with C. Wilkins re: Italian defendant service  | 0.20 |
| 06/29/17 | CEW | Email Morningstar Translation re: translation of<br>documents received from Brazil; conference with A.<br>Lizotte re: foreign defendant service; update hard copy<br>files for defendants in Italy  | 1.30 |
| 07/05/17 | AGL | Review Puzzarini motion to extend answer deadline   | 0.20 |
| 07/06/17 | AGL | Email from I Rona re: class certification   | 0.10 |
| 07/06/17 | TJF | Review rogatory proceedings from Brazil   | 2.00 |
| 07/10/17 | AGL | Review transcript of hearing on foreign jurisdiction  | 0.50 |
| 07/12/17 | AGL | Review answers filed by F. Morrissey  | 0.20 |
| 07/17/17 | AGL | Review Bristol Meyers jurisdiction decision   | 0.50 |
| 07/18/17 | HBM | Review report; conference with A. Lizotte re: same  | 0.30 |
| 07/21/17 | CEW | Telephone conference with M. Hussey re: return of<br>service at bankruptcy court and new case administrator   | 0.10 |
| 07/24/17 | AGL | Telephone conference with I. Rona re: foreign class<br>certification status; telephone conference with trustee re:<br>funding request   | 0.40 |
| 07/24/17 | CRB | Conference with I. Rona re: certification of foreign class<br>action representative   | 0.30 |
| 07/25/17 | AGL | Telephone conference to I. Rona, M. Duran re: class<br>counsel fees   | 0.20 |
| 07/25/17 | AGL | Review Portuguese defendant supplemental filing on<br>class representation; telephone conference with F.<br>Morrissey re: same  | 0.50 |
| 07/26/17 | AGL | Prepare for and attend continued hearing on class   | 3.50 |



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|          |     | certification - foreign action   |      |
| 07/26/17 | CRB | Attendance at hearing on motion for class certification re: foreign defendants   | 1.30 |
| 07/26/17 | HBM | Conference with C. Bennett before and after hearing re: certification in class action; email re: same  | 0.50 |
| 07/27/17 | AGL | Work on foreign class certification order; emails to Huron re: same; review Trustee revisions  | 2.20 |
| 08/03/17 | AGL | Review emails from MRDK re: foreign class certification order; revise order, emails to court re: same; draft notice of filing order; review signed order, email to KCC re: service issues; work on redlines for translation  | 1.20 |
| 08/10/17 | AGL | Conference with C. Bennett re: fraudulent transfer defenses  | 0.20 |
| 08/10/17 | CEW | Travel to Bankruptcy Court to retrieve return of service re: Darr v. Alecci  | 0.40 |
| 08/11/17 | CEW | Review documents received from Peru for service on defendants in Darr v. Alecci; conference with C. Bennett re: same   | 1.00 |
| 08/14/17 | CEW | Update foreign defendant spreadsheet and hard copy files re: Darr v. Alecci  | 1.10 |
| 08/15/17 | CEW | Update foreign defendant service chart and hard copy files re: Darr v. Wanzeler; update hard copy files re: Darr v. Alecci   | 0.70 |
| 08/16/17 | AGL | Email from I. Rona re: answer, class counsel fees  | 0.20 |
| 08/16/17 | AGL | Work on certificate of service - foreign class certification order; emails re: same  | 0.50 |
| 08/16/17 | CEW | Review documents re: B. Cardoso summons; forward same to translation services for translations estimate; review same and order translation   | 0.20 |
| 08/18/17 | AGL | Review class counsel fee application; email to trustee re: same; email to I. Rona, KCC re: service   | 0.80 |
| 08/22/17 | AGL | Emails with KCC re: Milligan Rona fee hearing  | 0.20 |
| 08/23/17 | AGL | Telephone conference with Jordan Shapiro re: Linda Hackett discussions; follow up with Tim Martin  | 0.30 |
| 08/25/17 | AGL | Email from I. Rona re: top 30 net equity   | 0.20 |
| 08/28/17 | AGL | Conference with C. Bennett re: class action status   | 0.20 |
| 08/28/17 | ANM | Conference with A. Lizotte re: sales price of 4506 San Mellina Drive property; analyze deed; analyze Broward County Registry of Deeds property results listing; follow-up conference with A. Lizotte re: confirmation of sales price listed on deed versus Broward County Registry of Deeds property results listing | 0.50 |
| 08/29/17 | AGL | Review memo and attachments from Huron re: top 30 claim request from defendant class; email to I. Rona re: same  | 0.50 |

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| 08/30/17 | AGL | Conference with C. Bennett, T. Martin re: form of class action expert reports, Rona inquiry; conference with I. Rona re: same   | 1.00 |
| 08/30/17 | CRB | Conference with J. Rona re: expert reports  | 0.40 |
| 08/31/17 | AGL | Emails with I. Rona re: expert reports  | 0.20 |
| 09/05/17 | AGL | Work on scheduling meeting with expert witnesses  | 0.30 |
| 09/05/17 | AGL | Draft response to MRDK fee application  | 0.40 |
| 09/05/17 | AGL | Review class answer in foreign class action   | 1.00 |
| 09/06/17 | AGL | Review pretrial notice for class action   | 0.10 |
| 09/07/17 | AGL | Revise response to Rona fee application and file  | 0.20 |
| 09/11/17 | AGL | Telephone conferences and emails with Jordon Shapiro re: Linda Hackett negotiations; research prior documentation on Hackett net winnings; work on scheduling meeting | 1.00 |
| 09/13/17 | AGL | Analysis of domestic class action pleadings, common issues  | 1.50 |
| 09/13/17 | MXC | Organize files in class action  | 3.50 |
| 09/14/17 | AGL | Prepare for 9/15 meeting with Rona, expert witnesses  | 0.50 |
| 09/15/17 | AGL | Prepare for and attend meetings with trustee, Stoneturn re: analysis of SIG, aggregation of accounts for class action   | 2.50 |
| 09/15/17 | CRB | Review Note and memo in preparation for meeting with defendant class expert   | 0.40 |
| 09/15/17 | CRB | Meeting with class action counsel and experts   | 2.90 |
| 09/15/17 | MXC | Organize files in class action  | 1.50 |
| 09/18/17 | HBM | Review recent Ponzi decision; conference with A. Lizotte re: same   | 0.50 |
| 09/19/17 | AGL | Telephone conference with J. Shapiro, Huron re: Hackett meeting   | 0.40 |
| 09/19/17 | AGL | Prepare for foreign class pretrial conference   | 0.40 |
| 09/19/17 | CRB | Notes for status conference; and attendance at status conference re: foreign class action   | 1.20 |
| 09/20/17 | AGL | Prepare for and attend meeting with Linda Hackett re: settlement of claims  | 2.00 |
| 09/21/17 | AGL | Review discovery plan for foreign class action  | 0.30 |
| 09/21/17 | AGL | Review Stoneturn aggregation findings; draft memo re: same  | 1.00 |
| 09/21/17 | CRB | Draft Rule 26(f) statement for foreign class action   | 0.80 |
| 09/21/17 | HBM | Review recent Ponzi decision; brief conference with A. Lizotte re: same   | 0.40 |
| 09/25/17 | AGL | Review J. Shapiro email re: Hackett claims data   | 0.20 |
| 09/25/17 | CEW | Review documents received from Brazil re: S. Montoya; begin review of documents received from Peru  | 0.60 |
| 09/26/17 | AGL | Conference with C. Wilkins re: foreign service issues   | 0.20 |
| 09/26/17 | CRB | Finalize Rule 26(f) report; and email I. Ronna  | 0.50 |
| 09/28/17 | CEW | Telephone conference with Bankruptcy Court re:  | 0.70 |



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|          |     | documents received from Italy re: Darr v. Alecci;<br>conference with Canon Business re: retrieval of same;<br>review documents received from Brazil re: V. Roza;<br>conference with A. Lizotte re: same; forward same to<br>translator for estimate; update foreign defendant chart<br>and hard copy files |      |
| 09/29/17 | AGL | Telephone conferences, emails with Huron, defendants,<br>C. Bennett re: access to Stoneham net winner analysis   | 0.30 |
| 09/29/17 | CEW | Email documents received from Brazil re: V. Roza for<br>estimate of translation  | 0.10 |
| 10/02/17 | AGL | Revise pretrial statement in foreign action; email to I.<br>Rona re: same  | 0.30 |
| 10/02/17 | CRB | Review recent case law relevant to extraterritorial effect<br>of Chapter 5 action - foreign class action   | 0.40 |
| 10/03/17 | AGL | Edit and file Rule 26F report - foreign action   | 0.20 |
| 10/03/17 | CEW | Print translation re: V. Roza service; draft certificate of<br>service re: same for attorney review; update foreign<br>service chart   | 0.30 |
| 10/04/17 | CEW | Review documents received from Italian Central<br>Authority; conference with A. Lizotte re: same; update<br>hard copy files of same  | 1.00 |
| 10/05/17 | AGL | Email from I. Rona re: expert witness files  | 0.20 |
| 10/05/17 | CEW | Update foreign defendant service charts  | 0.30 |
| 10/09/17 | AGL | Review recent cases on foreign jurisdiction  | 0.30 |
| 10/10/17 | TJF | Review Brazilian return of service   | 0.20 |
| 10/23/17 | AGL | Conference with C. Bennett, T. Martin re: Hackett claim<br>dispute   | 0.30 |
| 10/26/17 | AGL | Review further analysis of Hackett claim; telephone<br>conference with T. Martin re: same  | 0.50 |
| 10/30/17 | AGL | Memo to J. Shapiro re: Hackett claim reconciliation  | 0.30 |
| 11/02/17 | CEW | Review documents received from Spain re: J. Caino;<br>review documents received from Italy re: M. del Nero<br>re: service  | 0.20 |
| 11/03/17 | MKO | Review and revise memo and conduct additional case<br>law review re: 550 transferee status   | 2.00 |
| 11/06/17 | AGL | Email from J. Shapiro re: Hackett claim  | 0.10 |
| 11/07/17 | TJF | Review and evaluate Brazilian returns of service on<br>letters rogatory under Inter-American Convention.   | 1.00 |
| 11/08/17 | AGL | Conference with C. Wilkins re: Alves foreign service<br>issues   | 0.30 |
| 11/08/17 | CEW | Conference with A. Lizotte re: certificate of service<br>from Brazil   | 0.10 |
| 11/10/17 | AGL | Emails/telephone conference with Huron, I Rona re:<br>Stoneturn aggregation methods  | 0.40 |
| 11/13/17 | AGL | Emails with J. Shapiro, Huron re: Hackett claim<br>reconciliation  | 0.20 |

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| 11/13/17 | AGL | Review Stoneturn fee application, class counsel appointment order  | 0.50 |
| 11/14/17 | AGL | Memo to J. Shapiro re: Hackett net winnings  | 0.30 |
| 11/16/17 | TJF | Review and evaluate Brazilian letters rogatory under Inter-American Convention.  | 0.40 |
| 11/17/17 | AGL | Telephone conference with trustee re: reconciliation of aggregation methods  | 0.20 |
| 11/21/17 | AGL | Telephone conference with T. Martin re: Stoneturn aggregation issues; analysis of Huron memo evaluating Stoneturn conclusions  | 0.80 |
| 11/27/17 | AGL | Review Huron email on aggregation method, issues   | 0.40 |
| 11/27/17 | TJF | Review Brazilian letters rogatory; correspondence with Brazilian counsel re interpretation of letters rogatory.  | 0.40 |
| 11/28/17 | AGL | Meeting with C. Bennett, D. Rabinovitz re: Huron expert report; assemble aggregation materials   | 0.50 |
| 11/28/17 | CRB | Conference with H. Murphy re: expert report, claims issues, and D. Rabinovitz re: expert report and overview   | 0.60 |
| 11/29/17 | AGL | Emails with T. Martin re: 11/30 conference on expert report; review and circulate complaints   | 0.40 |
| 11/29/17 | DMR | Review various summaries provided by H. Murphy   | 1.00 |
| 11/29/17 | DMR | Review two amended complaints  | 6.00 |
| 11/30/17 | AGL | Telephone conferences with and emails with Huron re: data exchange with class defendants   | 0.50 |
| 11/30/17 | AGL | Telephone conference with trustee re: expert report; prepare for and attend conference call with Huron, D. Rabinovitz re: format of same; assemble materials for expert report   | 2.00 |
| 11/30/17 | CRB | Conference call with H. Murphy and Trustee re: expert report for the class action  | 0.60 |
| 11/30/17 | DMR | Review material in preparation for telephone call with T. Martin; telephone call to T. Martin with C. Bennett and A. Lizotte re: expert report   | 1.80 |
| 12/01/17 | DMR | Review prior filings by S. Darr  | 1.60 |
| 12/05/17 | CEW | Continue to review documents received from Brazil; update hard copy files and foreign defendant spreadsheet; conferences with A. Lizotte re: service on defendants in Brazil; scan and forward pertinent documents to Morningstar for translation estimate | 2.90 |
| 12/05/17 | HBM | Review Stoneturn Group interim fee application; conference with A. Lizotte re: same  | 0.50 |
| 12/07/17 | DMR | Review various pleadings and affidavits of S. Darr in preparation of witness issues  | 2.40 |
| 12/07/17 | TJF | Conference with E. Jeffrey re: service of process in China   | 0.20 |
| 12/08/17 | AGL | Conference with D. Rabinovitz, T. Martin re: outline of expert report  | 0.20 |

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| 12/08/17 | TJF | Review incoming letters rogatory  | 0.20 |
| 12/20/17 | AGL | Draft response to Stoneturn fee application   | 0.50 |
| 12/21/17 | AGL | Revise response to Stoneturn fee application; work on telephonic appearance issue - SEC   | 0.30 |
| 12/27/17 | CRB | Review draft outline of Expert Report; and conference with D. Rabinovitz  | 0.80 |
| 12/28/17 | DMR | Continued review of pleadings in preparation for review of experts  | 1.40 |
| 01/02/18 | AGL | Conference with C. Bennett re: Huron expert report  | 0.30 |
| 01/02/18 | CEW | Telephone conference with Bankruptcy Court Clerk's Office re: documents received from China; conference with Canon Business re: retrieval of same; conference with A. Lizotte re: proofs of claim filed by Internal Revenue Service; search dockets for same; conference with A. Lizotte re: same; retrieve claims filed by IRS and print for attorney review | 1.60 |
| 01/02/18 | DMR | Review expert reports and outlined various issues; review affidavits filed in criminal matter   | 2.80 |
| 01/03/18 | AGL | Review first draft of Martin expert report; assemble relevant supporting materials  | 1.20 |
| 01/03/18 | AGL | Conference with H. Murphy, C. Bennett re: prejudgment relief in class action; email to Trustee re: same; conference with C. Wilkins re: breakdown of domestic defendants; search for prejudgment relief sought by PIEC in MDL   | 1.30 |
| 01/03/18 | CEW | Conference with A. Lizotte re: domestic defendants and residences; analyze Darr v. Argueta complaint re: state of defendants' residences and net winner amount; create chart to record same and begin to incorporate data into for attorney review  | 1.10 |
| 01/03/18 | DMR | Research on 1st circuit cases citing Daubert and Kuhn Ho Tire on expert witness   | 1.40 |
| 01/03/18 | DMR | Review various documents as well as expert witness issues including stay filed by trustee in 201S   | 2.40 |
| 01/03/18 | HBM | Telephone call with Trustee; conference with C. Bennett and A. Lizotte re: collection actions, issues and strategy  | 0.50 |
| 01/04/18 | CEW | Finalize incorporating net winner data re: Darr v. Argueta into chart for attorney review   | 3.20 |
| 01/04/18 | DMR | Additional legal research re: 1st circuit cases regarding renewed showing for admissibility of expert reports in similar circumstances as Telexfree   | 2.40 |
| 01/05/18 | AGL | Work on assembling date for named defendants, prejudgment relief  | 0.50 |
| 01/05/18 | AGL | Prepare for and attend conference call with Trustee re: IRS dispute, status, of net winner portal to assert user account ownership, prejudgment relief  | 1.50 |

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| 01/05/18 | CEW | Review emails from A. Lizotte and A. Mazzaella re: net winner chart; revise same pursuant to attorney revisions   | 0.90 |
| 01/05/18 | CRB | Conference call with Trustee re: domestic class action and prejudgment relief and asset search  | 0.20 |
| 01/05/18 | DMR | Review prior order of the court re: initial order of court finding telex operated Ponzi scheme and law of the case  | 0.80 |
| 01/05/18 | DMR | Review and analysis of Judge Hoffman's proposed findings of fact, recommending those to the U.S. District Court, with particular focus on the court's definition of triangular transactions | 1.20 |
| 01/08/18 | AGL | Participate in meeting with Huron re: expert report for class action litigation   | 0.50 |
| 01/08/18 | CRB | Review D. Rabinovitz's comments to expert; and conference with D. Rabinovitz  | 0.40 |
| 01/08/18 | CRB | Meeting with T. Martin, S. Darr regarding expert report   | 0.60 |
| 01/08/18 | DMR | Revisions to memorandum re: expert testimony based on meeting with S. Darr and T. Martin  | 0.80 |
| 01/08/18 | DMR | Office conference with S. Darr and T. Martin re: expert testimony issues  | 1.70 |
| 01/08/18 | DMR | Work on memo re: expert testimony areas   | 1.80 |
| 01/09/18 | AGL | Review emails re: status of expert report   | 0.30 |
| 01/09/18 | DMR | Review witness statement received from T. Martin  | 0.50 |
| 01/09/18 | DMR | Further review of relevant pleadings from criminal matter   | 1.20 |
| 01/10/18 | DMR | Compared witness statements with previously filed affidavits by trustee   | 0.60 |
| 01/10/18 | DMR | Emails with T. Martin re: witness statement and contents of T. Martin's anticipated expert report   | 0.80 |
| 01/10/18 | DMR | Review T. Martin's witness statement prepared in connection with the criminal matter  | 0.80 |
| 01/11/18 | AGL | Review asset search data for net winners; conference with C. Bennett re: same   | 1.00 |
| 01/11/18 | CRB | Conference with A. Lizotte regarding asset searches and prejudgment relief  | 0.40 |
| 01/11/18 | DMR | Review documents from Martin re: expert reports   | 2.40 |
| 01/12/18 | AGL | Conference with paralegals re: asset search activity  | 0.20 |
| 01/12/18 | CEW | Conference with A. Mazzaella and A. Lizotte re: asset searches for adversary defendants   | 0.10 |
| 01/12/18 | DMR | Review multiple cases re: financial expert testimony and challenges to same   | 3.60 |
| 01/18/18 | AGL | Emails with A. Mazzaella, Huron re: asset search status   | 0.20 |
| 01/19/18 | AGL | Conference with J. Sorondo, A. Mazzaella re: additional asset search reports  | 0.50 |
| 01/19/18 | DMR | Revising outline of T. Martin's expert reports based on Daubert standards   | 2.60 |

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| 01/19/18 | MKO | Research re: Crystallex Third Circuit case and transfer of funds by non-debtor and applicability to triangular transfers  | 1.50 |
| 01/22/18 | AGL | Legal research re: recent cases on indirect transfers   | 1.50 |
| 01/22/18 | DMR | Telephone call with T. Martin re: expert report issues; reviewed same   | 2.80 |
| 01/24/18 | DMR | Telephone conference with T. Martin   | 0.50 |
| 01/24/18 | DMR | Review and revision re: aggregation method and triangular transactions  | 2.10 |
| 01/26/18 | AGL | Review results of asset search; conference with A. Mazzaella  | 0.50 |
| 01/26/18 | MKO | Research re: First Citizens and related cases re: fraud transfer actions vs. financial institutions; memo to H. Murphy re: same   | 2.30 |
| 01/29/18 | AGB | Meet with T. Folkman re: research assignment to determine substantive and procedural aspects of pretrial real estate and automobile attachment in several state jurisdictions relating to defendants in domestic class action (0.2); Begin to conduct preliminary searches of state rules and statutes re: same (0.2) | 0.40 |
| 01/29/18 | CRB | Meeting to consider the basis of prejudgment attachment and other relief against domestic net winners   | 0.40 |
| 01/29/18 | DMR | Email to T. Martin re: expert report  | 0.30 |
| 01/29/18 | DMR | Review recently filed expert report on behalf of government in NECC matters as to form and substance of expert report   | 0.80 |
| 01/29/18 | DMR | Further review and analysis of criminal pleadings for language and concepts previously made as part of the record   | 1.40 |
| 01/29/18 | MKO | Review research re: out-of-state attachments; revise memo re: same and conference with T. Folkman re: same  | 1.50 |
| 01/29/18 | TJF | Research re procedure for attachment actions; conference with A. Mazzaella re locations of defendants; conference with A. Brier re state law research   | 4.00 |
| 01/31/18 | AGB | Conduct online research re. pre-judgment attachment procedure and substantive law in list of jurisdictions provided by T. Folkman   | 1.40 |
| 01/31/18 | DMR | Additional research to locate other expert reports that might be useful for Martin  | 1.60 |
| 01/31/18 | TJF | Work on model papers  | 1.00 |
| 02/02/18 | AGB | Begin research re. substantive and procedural aspects of prejudgment real estate attachment in 11 states per assignment from T. Folkman   | 0.50 |
| 02/12/18 | DMR | Telephone conference with T. Martin re: next steps  | 0.40 |

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| 02/12/18 | DMR | Review first draft of outline from T. Martin  | 0.60  |
| 02/15/18 | AGB | Meet with T. Folkman re: status of research, preliminary findings   | 0.30  |
| 02/15/18 | AGB | Continue research, review, and summary of substantive and procedural laws re: prejudgment real estate attachment in eleven states, reviewing relevant case law as necessary                                     | 4.00  |
| 02/15/18 | AGL | Conference with T. Folkman, T. Martin re: prejudgment relief backup   | 0.50  |
| 02/16/18 | AGB | Research re: attachment of property in one state to secure potential judgment in action pending in another state, and bankruptcy jurisdiction re: same; review and analyze federal and state materials re: same | 2.00  |
| 02/16/18 | AGL | Review memo from T. Martin re: aggregation process, support for prejudgment relief  | 0.30  |
| 02/16/18 | AGL | Prepare for and attend conference with I. Rona, C. Bennett re: expert reports   | 0.70  |
| 02/16/18 | CRB | Conference call with I. Rona regarding expert reports scheduling; and outline of issues   | 0.40  |
| 02/16/18 | CRB | Review aggregation analysis and draft affidavit from T. Martin re: prejudgment relief motion and reasonable likelihood of success standard; and edits and comments in relation to expert report                 | 0.90  |
| 02/16/18 | DMR | Review T. Martin's email to T. Folkman  | 0.20  |
| 02/16/18 | DMR | Telephone conference with opposing counsel re: expert report deadlines  | 0.30  |
| 02/19/18 | AGB | Continued research and summary of substantive and procedural laws re: prejudgment real estate attachment in eleven states   | 12.00 |
| 02/20/18 | AGB | Draft e-mail to T. Folkman re. status of research and send draft summary chart and memo (minus MA law and procedure summary)  | 0.30  |
| 02/20/18 | AGB | Continue research and summary of substantive and procedural laws re: prejudgment real estate attachment in eleven states, attention to preparing memo re: same  | 3.70  |
| 02/20/18 | DMR | Emails and telephone conference with T. Martin re: strategy of expert reports   | 0.60  |
| 02/21/18 | AGB | Complete review, analysis, and summary of Massachusetts prejudgment real estate procedure and send updated memorandum to T. Folkman for review  | 1.50  |
| 02/21/18 | AGL | Begin drafting motion to approve Crosby settlement agreement  | 2.00  |
| 02/21/18 | DMR | Reviewed drafts of report from T. Martin and outlined comments re: same; reviewed affidavit of trustee from criminal case to compare  | 1.80  |
| 02/22/18 | CRB | Review draft expert report and comments and suggest   | 1.60  |



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|          |     | edits   |      |
| 02/22/18 | DMR | Continue review and analysis of T. Martin's draft of expert report  | 1.60 |
| 02/23/18 | CRB | Review expert report; and edits   | 2.10 |
| 02/23/18 | DMR | Review and analysis of draft report of T. Martin  | 1.30 |
| 02/27/18 | AGB | Meet with T. Folkman to discuss status of Telex actions re. prepetition attachment of real estate                                     | 0.20 |
| 02/28/18 | AGB | Review of pleadings re: findings of fact, supporting documents, oppositions/objections per request of T. Folkman to aid in drafting   | 1.50 |
| 02/28/18 | AGL | Telephone conference with T. Martin re: expert report   | 0.10 |
| 02/28/18 | DMR | Emails with T. Martin re: report  | 0.30 |
| 02/28/18 | DMR | Reviewed T. Martin report   | 0.60 |
| 02/28/18 | TJF | Conference with A. Brier; draft papers re attachments   | 3.20 |
| 03/01/18 | AGL | Review draft expert report for class action   | 1.30 |
| 03/04/18 | DMR | Review of analysis of material from T. Martin re: expert testimony  | 2.10 |
| 03/05/18 | DMR | Analysis of areas for expert testimony and review of T. Martin material   | 1.30 |
| 03/07/18 | CRB | Review Affidavit; meeting with D. Rabinovitz  | 0.40 |
| 03/07/18 | CRB | Review recent case law re: Ponzi scheme distribution and litigation   | 0.40 |
| 03/07/18 | DMR | Analysis of points to be included in expert opinion as to net winners including various aggregation concepts                          | 2.80 |
| 03/08/18 | AGL | Work on Huron expert report with D. Rabinovitz  | 0.30 |
| 03/08/18 | DMR | Continue analysis and revisions to areas of expert testimony at trial   | 3.10 |
| 03/09/18 | AGB | Conduct research for T. Folkman re: citizenship for diversity purposes of bankruptcy trustees and draft e-mail with findings re: same | 0.30 |
| 03/09/18 | CRB | Review attachment issues  | 0.60 |
| 03/09/18 | CRB | Review and edit expert report   | 0.90 |
| 03/09/18 | DMR | Continued review of expert testimony for trial and explanation of various steps involved in aggregation process                       | 2.80 |
| 03/09/18 | HBM | Telephone call with trustee re: Florida   | 0.20 |
| 03/09/18 | TJF | Draft memorandum re: attachments  | 4.50 |
| 03/11/18 | TJF | Draft memorandum re: motion for attachment  | 3.80 |
| 03/12/18 | AGL | Conference with H. Murphy, C. Bennett re: prejudgment relief in multiple fora; review chart of defendants/assets                      | 0.50 |
| 03/12/18 | AGL | Review updated draft of Huron expert report - class action; conference with C. Bennett, D. Rabinovitz; work on revisions              | 4.00 |
| 03/12/18 | CRB | Meeting with A. Lizotte and D. Rabinovitz; edits and comments regarding expert report   | 0.60 |
| 03/12/18 | CRB | Review motion and affidavit for attachment in the   | 0.80 |

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|          |     | domestic class action; and conference with T. Folkman regarding same   |      |
| 03/12/18 | DMR | Telephone conference with T. Martin re: expert issues  | 0.80 |
| 03/12/18 | DMR | Further analysis of aggregation method and Daubert standard  | 2.10 |
| 03/12/18 | HBM | Conference with C. Bennett re: issues and strategy re: pre-judgment conference   | 0.30 |
| 03/12/18 | TJF | Conference with C. Bennett; revise memorandum; begin drafting motion for attachment re: Massachusetts defendants   | 3.50 |
| 03/13/18 | AGL | Review proposed inserts to Martin expert report  | 0.30 |
| 03/13/18 | DMR | Analysis and preparation of expert testimony possible challenge to admissibility of testimony of T Martin of Huron   | 3.20 |
| 03/14/18 | AGL | Review class action docket for defaults; email to C. Bennett re: same  | 0.40 |
| 03/14/18 | DMR | Review and analysis of memo from T. Martin re: expert testimony  | 2.10 |
| 03/15/18 | AGL | Work on Martin revised expert report; conference with D. Rabinovitz, T. Martin re: same  | 2.30 |
| 03/15/18 | DMR | Conference with C. Bennett and A. Lizotte re: expert witness testimony strategy  | 0.80 |
| 03/15/18 | DMR | Further analysis re: application of Daubert to T. Martin expected testimony  | 1.80 |
| 03/19/18 | DMR | Work on issues relating to expert testimony  | 2.40 |
| 03/20/18 | ANM | Conference with A. Brier and T. Folkman re: updating property searches for defendants identified as Massachusetts property owners; begin to research multiple MA registries relative to said defendants and obtain respective property deeds   | 3.50 |
| 03/20/18 | DMR | Additional work on expert testimony issues   | 1.60 |
| 03/21/18 | ANM | Conference with T. Folkman re: defendants' default status; analyze docket accordingly re: same; brief conference with C. Bennett re: Frantz Balan; briefly analyze docket relative to same; update Net winners index to include Default status for respective defendants; brief conference with T. Folkman re: results | 1.00 |
| 03/21/18 | ANM | Continue to research multiple MA registries relative to said defendants and obtain respective property deeds; update Net Winners Asset Search Report Summary to reflect changes; brief follow-up conference with A. Brier and T. Folkman re: results and next steps  | 3.50 |
| 03/22/18 | AGL | conference with C. Bennett re: expert report   | 0.20 |
| 03/22/18 | ANM | Conference with T. Folkman re: claims filed by Massachusetts property owning Net Winner Defendants; search and analyze claims register for 2014-40987  | 1.50 |



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|          |     | (Telexfree, LLC) to ascertain if claims were filed by said Net Winner defendants; brief follow-up conference with T. Folkman re: no claims filed said Defendants  |      |
| 03/22/18 | DMR | Reviewed materials from T. Martin and continued analysis on aggregation methodology for expert testimony purposes   | 1.60 |
| 03/23/18 | AGL | Review/revise latest version of expert report; conference with C. Bennett re: same  | 1.50 |
| 03/23/18 | DMR | Further questions of admissibility of T. Martin testimony   | 1.30 |
| 03/23/18 | TJF | Revise motion papers re: attachment; conference with A. Brier   | 1.50 |
| 03/26/18 | AGB | Draft e-mail to T. Martin re. user account data to attach in support of affidavit   | 0.10 |
| 03/26/18 | AGB | Meet with T. Folkman re. draft Motion to attach real property, Memo in support, and supporting affidavits   | 0.20 |
| 03/26/18 | AGB | Prepare template writ of attachment and send to T. Folkman for review; e-mail correspondence and teleconference with J. L. Sorondo (Huron) re. request for user account information; Discussion with C. Bennett re: affidavit of T. Martin; Review of draft Motion and supporting Memorandum sent by T. Folkman   | 2.00 |
| 03/26/18 | AGL | Conference with A. Brier re: back up for prejudgment relief   | 0.30 |
| 03/26/18 | AGL | Work on expert report - class action; conference with C. Bennett, D. Rabinovitz re: same  | 1.50 |
| 03/26/18 | ANM | Conference with A. Brier re: Writ of Attachments; begin to draft said Writs for respective net winner defendants with property interest in MA real estate   | 3.50 |
| 03/26/18 | CRB | Conference; and edits to expert report  | 1.20 |
| 03/26/18 | DMR | Office conference with A. Lizotte and C. Bennett re: expert testimony strategy  | 0.80 |
| 03/27/18 | AGB | Draft e-mail to T. Folkman re: business records question, Telex case background   | 0.20 |
| 03/27/18 | AGB | Draft e-mail to A. Mazzearella re. populating draft writs of attachments; Multiple discussions with A. Mazzearella re: same and re: draft affidavit, deeds; Review e-mail from A. Mazzearella re: populated writs and affidavit   | 1.40 |
| 03/27/18 | AGB | Continue review and revision of draft Memo in support of Motion to attach real property, consulting Finding of Facts and Conclusions of Law entered in Dos Santos and other documents cited in draft statement of facts; Review draft expert report of T. Martin and engage in e-mail correspondence with J.L. Sorondo, including drafting two lengthy e-mails with technical questions re. | 2.50 |

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| 03/27/18 | ANM | Begin to draft A. Mazzaella Affidavit re: Motion for Real Estate Attachment; brief conference with A. Brier re: draft and next steps   | 1.00 |
| 03/27/18 | ANM | Continue to draft and finalize Writs of Attachments for respective net winner defendants with property interest in MA real estate  | 2.00 |
| 03/27/18 | DMR | Review materials re: expert report in criminal matter  | 0.40 |
| 03/27/18 | DMR | Reviewed Martin's report for criminal sentencing purposes  | 0.40 |
| 03/27/18 | HBM | Review and revisions to draft expert report  | 1.20 |
| 03/28/18 | AGL | Further revisions to Huron expert report; conference with C. Bennett re: same; lengthy conference with H. Murphy re: same  | 3.50 |
| 03/28/18 | DMR | Continued analysis of meeting admissibility standard for expert testimony  | 2.10 |
| 03/28/18 | HBM | Review draft expert report; conference with D. Rabinovitz re: same   | 1.70 |
| 03/28/18 | HBM | Meeting with team re: net winner litigation and export report  | 2.00 |
| 03/29/18 | AGB | Work with A. Mazzaella to draft affidavit in support of Motion for Real Estate Attachment (1.5); draft e-mail to T. Folkman attaching same with update re: draft Motion status (0.2)                         | 1.70 |
| 03/29/18 | AGL | Conference with D. Rabinovitz re: expert report edits; review edits  | 0.80 |
| 03/29/18 | AGL | Review alternatives for assessing damages in class actions, other case models; conference with C. Bennett re: same   | 1.20 |
| 03/29/18 | ANM | Conference with A. Brier re: updating Affidavit in Support of Writ of Attachment; revise chart summarizing Net Winners names, net equity and address on deed; brief conference with A. Brier to provide same | 0.50 |
| 03/29/18 | ANM | Conference with A. Brier re: draft affidavit; analyze same; revise draft accordingly to include edits; brief follow-up conference with A. Brier re: revised draft  | 1.00 |
| 03/29/18 | CRB | Conference with A. Lizotte regarding form of order - Judgment amount in class action litigation - consideration of order entered in Zeek Rewards   | 0.30 |
| 03/29/18 | DMR | Office conference with C. Bennett, A. Lizotte and H. Murphy re: expert testimony and strategy  | 1.50 |
| 03/29/18 | MKO | Additional research re: treatment and allocation of liability against defendant class; memo to A. Lizotte re: same   | 1.30 |

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| 03/30/18 | AGL | Edits to expert report; conference with D. Rabinovitz re: same, evidentiary issues   | 1.10 |
| 03/30/18 | CEW | Conference with A. Lizotte re: totals needed for domestic and foreign class action suits; retrieve all complaints and amended complaints to ensure all defendant net winner payments are accounted for in tally; create spreadsheets for domestic and foreign defendants and incorporate data into same; calculate totals and forward same to attorney for use | 1.50 |
| 03/30/18 | DMR | Continued analysis of issues related to Huron's methodology  | 1.80 |

| <u>Attorney</u>         | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>       |
|-------------------------|--------------|-------------|---------------------|
| ANDREA G. BRIER         | 70.90        | 410.00      | 29,069.00           |
| ANDREA G. BRIER         | 36.20        | 425.00      | 15,385.00           |
| ANDREA L. MACIVER       | 34.10        | 325.00      | 11,082.50           |
| ANDREA N. MAZZARELLA    | 5.00         | 220.00      | 1,100.00            |
| ANDREA N. MAZZARELLA    | 17.50        | 225.00      | 3,937.50            |
| ANDREW G. LIZOTTE       | 106.60       | 595.00      | 63,427.00           |
| ANDREW G. LIZOTTE       | 32.30        | 615.00      | 19,864.50           |
| CHARLES R. BENNETT, JR. | 42.20        | 625.00      | 26,375.00           |
| CHRISTINE E. WILKINS    | 56.00        | 220.00      | 12,320.00           |
| CHRISTINE E. WILKINS    | 8.40         | 225.00      | 1,890.00            |
| DANIEL M. RABINOVITZ    | 96.00        | 550.00      | 52,800.00           |
| HAROLD B. MURPHY        | 13.50        | 625.00      | 8,437.50            |
| MANDY CASPERSON         | 6.00         | 220.00      | 1,320.00            |
| MICHAEL K. O'NEIL       | 2.60         | 345.00      | 897.00              |
| MICHAEL K. O'NEIL       | 6.60         | 360.00      | 2,376.00            |
| SHAWN LU                | 4.30         | 335.00      | 1,440.50            |
| THEODORE J. FOLKMAN     | 5.40         | 515.00      | 2,781.00            |
| THEODORE J. FOLKMAN     | 21.50        | 535.00      | 11,502.50           |
| <b>Total Fees</b>       |              |             | <b>\$266,005.00</b> |

EXHIBIT E  
SERVICES RELATING TO LITIGATION WITH PIEC

| <u>Date</u> | <u>Atty</u> | <u>Description</u>   | <u>Hours</u> |
|-------------|-------------|--|--------------|
| 03/03/17    | AGL         | Conference with H. Murphy re: status of Dos Santos litigation  | 0.20         |
| 03/07/17    | AGL         | Review Fabio Faria dismissal pleadings   | 0.30         |
| 03/14/17    | AGL         | Telephone conference with K. Fisher re: request for tax records  | 0.20         |
| 03/15/17    | AGL         | Emails re: follow up on PIEC tax records request   | 0.30         |
| 03/21/17    | AGL         | Email from PIEC re: tax records  | 0.10         |
| 04/04/17    | MKO         | Review motion filed by PIEC in MDL; email to H. Murphy, C. Bennett and A. Lizotte re: same                                 | 0.40         |
| 04/05/17    | AGL         | Review PIEC motion to modify stay in MDL action; conference with H. Murphy re: same  | 0.50         |
| 04/05/17    | CRB         | Review MDL motion to amend and amended Complaints; review information from T. Martin re: foreign defendant contact with US | 0.40         |
| 04/05/17    | HBM         | Review pleadings filed by PIEC; draft complaint; conference with C. Bennett; email to trustee                              | 1.50         |
| 04/14/17    | AGL         | Review bank response in MDL to motion to partially modify stay to amend complaints   | 0.10         |
| 04/14/17    | AGL         | Telephone conference with trustee re: PIEC information requests  | 0.20         |
| 04/14/17    | MKO         | Review response of defendants to PIEC; motion to modify stay; email to A. Lizotte, H. Murphy and C. Bennett re: same       | 0.30         |
| 04/27/17    | AGL         | Review email from Brown Rudnick re: attorney client privilege issues   | 0.20         |
| 04/27/17    | AGL         | Telephone conference with C. Bennett, W. Baldiga re: privilege waiver  | 0.30         |
| 04/27/17    | CMC         | Review records re: confidentiality issues; conference with A. Lizotte  | 0.30         |
| 04/27/17    | CRB         | Call with Brown Rudnick re: attorney-client documents relating to Debtor's prepetition counsel                             | 0.30         |
| 05/02/17    | AGL         | Review PIEC reply to Base Commerce objection in MDL  | 0.20         |
| 05/02/17    | HBM         | Review latest filing by PIEC; email to trustee re: same  | 0.60         |
| 05/04/17    | AGL         | Emails with PIEC re: document request; review  | 0.60         |

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|          |     | confidentiality agreement; conference with C. Bennett<br>re: same   |      |
| 05/08/17 | AGL | Review MDL injunction pleadings against<br>Hughes/Phoenix   | 0.30 |
| 05/08/17 | HBM | Review latest pleadings from MDL; conference with A.<br>Lizotte re: same; email re: same  | 0.40 |
| 05/08/17 | MKO | Review Dos Santos motion re: J. Hughes P.I.; email to<br>H. Murphy, C. Bennett and A. Lizotte re: same  | 0.40 |
| 05/10/17 | AGL | Telephone conference with D. Fine re: PWC<br>confidentiality agreement, disclosures   | 0.20 |
| 05/11/17 | AGL | Emails with PIEC re: PWC document production  | 0.20 |
| 05/17/17 | AGL | Review MDL docket, status conference  | 0.20 |
| 05/17/17 | AGL | Review criminal docket - restitution hearing  | 0.20 |
| 05/17/17 | HBM | Prepare for and attend status conference with MDL;<br>email re: same  | 4.50 |
| 05/22/17 | AGL | Review recent SDNY decision on particularized claims  | 0.50 |
| 05/24/17 | AGL | Review pleadings in MDL re: Craft injunction;<br>conference with SEC, H. Murphy, C. Bennett re: same;<br>review SEC pleadings                       | 2.50 |
| 05/25/17 | AGL | Emails with Huron re: PIEC information request  | 0.20 |
| 05/26/17 | AGL | Review order in MDL action re: services of subpoena<br>on Trustee and underlying pleading   | 0.30 |
| 05/26/17 | MKO | Review orders on PIEC motion to modify stay in MDL;<br>email to team re: same   | 0.20 |
| 05/30/17 | AGL | Review PIEC subpoena for bank records; search for,<br>review applicable confidentiality agreements; draft letter<br>to targets re: protective order | 1.80 |
| 05/31/17 | AGL | Emails with Huron re: 2004 subpoenas  | 0.20 |
| 05/31/17 | AGL | Review PIEC motion to withdraw P.I. request against<br>Craft; telephone conference and email to SEC re: same  | 0.50 |
| 05/31/17 | AGL | Work on letters to banks, etc. re: PIEC request for 2004<br>documents,  | 1.50 |
| 06/01/17 | AGL | Revise letters to respondents re: compliance with<br>subpoena; conference with C. Bennett   | 1.00 |
| 06/02/17 | AGL | Conference with C. Bennett re: 2004 documents, PIEC<br>subpoena; telephone conference with T. Martin re: same                                       | 0.50 |
| 06/02/17 | CRB | Conference with A. Lizotte re: MDL discovery requests   | 0.30 |
| 06/06/17 | AGL | Telephone conferences with Huron, PIEC re: e-data<br>sharing of 2004 materials  | 0.30 |
| 06/08/17 | AGL | Prepare for and attend conference call with PIEC re:<br>data turnover; conference with C. Bennett re: same  | 1.00 |
| 06/08/17 | AGL | Review Fourth amended PIEC complaint; search MDL<br>docket re: status; memo to C. Bennett re: same  | 2.00 |
| 06/09/17 | AGL | Telephone conference with T. Martin re: document<br>production to PIEC  | 0.20 |
| 06/09/17 | AGL | Telephone conference with D. Bernstein re: PIEC   | 0.30 |

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|          |     | forfeiture dispute, status of settlement  |      |
| 06/09/17 | AGL | Further review of PIEC position on forfeiture order and memo to M. Murrane; search pleadings on docket  | 2.50 |
| 06/12/17 | AGL | Review MDL docket re: status of stay  | 0.30 |
| 06/12/17 | AGL | Review letters from Wells Fargo re: PIEC subpoena request; telephone conference with Lee Armstrong re: Citizens subpoena; telephone conference with trustee re: same                    | 0.60 |
| 06/13/17 | AGL | Review TD Bank letter re: protective order  | 0.20 |
| 06/14/17 | AGL | Review Relativity file chart; telephone conferences with Huron re: access issues, third parties   | 0.50 |
| 06/14/17 | AGL | Telephone conference with trustee re: PIEC information request; review exhibit; conference with C. Bennett, R. Bonsignore re: same  | 0.60 |
| 06/15/17 | AGL | Telephone conference with T. Martin re: catalog of documents  | 0.50 |
| 06/19/17 | AGL | Telephone conference with T. Martin re: production of documents requested by PIEC   | 0.20 |
| 06/20/17 | AGL | Conference with PIEC, Huron re: PIEC supplemental document request; conference with H. Murphy re: same  | 0.50 |
| 06/21/17 | AGL | Conference with K. Fisher, Huron re: PIEC document requests; review letters from BofA, PWC, Citizens re: subpoena request; draft response to PIEC; email from R> Bonsignore re: records | 1.50 |
| 06/21/17 | CMC | Review proposed MA SOS filing   | 0.30 |
| 06/21/17 | CRB | Discovery issues  | 0.20 |
| 06/22/17 | AGL | Review subpoena letter from ProPay; email to R. Bonsignore re: status of subpoena objections; update chart  | 0.50 |
| 06/23/17 | AGL | Email from R. Bonsignore re: 6/26 conference  | 0.10 |
| 06/26/17 | AGL | Prepare for and attend call with PIEC re: document access/production; conference with C. Bennett, T. Martin re: same; review subpoena objections  | 2.20 |
| 06/26/17 | CRB | Conference re: PIEC's request for documents and access to SIG   | 0.40 |
| 06/26/17 | CRB | Telephone conference with R. Bonsignore re: PIEC's document request to the Trustee; and follow up with T. Martin  | 0.70 |
| 06/27/17 | AGL | Analysis of MDL pleadings re: quashing subpoena to trustee; emails re: same   | 0.80 |
| 06/28/17 | AGL | Work on memo re: document requests from PIEC  | 0.60 |
| 06/29/17 | AGL | Revise memo of discussion with PIEC re: document, information requests; conference with C. Bennett  | 0.50 |
| 07/11/17 | AGL | Review status of PIEC document requests; conference with SEC, C. Bennett re: same   | 0.50 |
| 07/24/17 | AGL | Telephone conference with Kelli Fisher re: status of  | 0.20 |

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|          |     | 2004 production   |      |
| 07/27/17 | AGL | Review Huron chart of relativity data conversions;<br>telephone conference with T. Martin re: same  | 0.40 |
| 08/01/17 | AGL | Telephone conference with T. Martin re: document<br>production to PIEC  | 0.10 |
| 08/01/17 | AGL | Telephone conference with K. Fisher re: PWC<br>production   | 0.10 |
| 08/09/17 | AGL | Emails with K. Fisher re: Relativity documents;<br>compare with confidentiality agreements; letter to fisher<br>and arrange for turnover of documents   | 0.50 |
| 08/15/17 | AGL | Review PIEC requests for information; conference with<br>C. Bennett re: same  | 0.40 |
| 08/15/17 | CRB | Conference with A. Lizotte regarding PIEC request for<br>further information  | 0.20 |
| 08/15/17 | HBM | Review issues re: email from PIEC; brief conference<br>with A. Lizotte re: same; telephone call with trustee re:<br>same                                | 0.60 |
| 08/25/17 | AGL | Email to T. Martin re: PIEC data  | 0.10 |
| 08/29/17 | AGL | Analysis of Huron data on personnel, credit issuance;<br>draft reply to PIEC inquiry re: same; conference with H.<br>Murphy re: same                    | 1.30 |
| 08/30/17 | AGL | Email with K. Fisher re: Telex Free data requests from<br>PIEC; telephone conference with T. Martin re: same  | 0.40 |
| 09/11/17 | AGL | Telephone conferences, emails with T. Martin re:<br>release of payment processor data; review<br>confidentiality agreements; conference with C. Bennett | 1.00 |
| 09/22/17 | AGL | Emails with PIEC, Huron re: data requests   | 0.20 |
| 09/26/17 | AGL | Telephone conference with Kellie Fisher, Huron re:<br>access to SIG   | 0.30 |
| 09/29/17 | AGL | Emails with Kellie Fisher, Huron re: access to Debtor<br>emails   | 0.20 |
| 10/02/17 | AGL | Telephone conference with Kellie Fisher re: SIG, emails   | 0.10 |
| 10/10/17 | AGL | Telephone conference with T. Martin re: turnover of<br>SIG to PIEC  | 0.20 |
| 10/17/17 | AGL | Arrange for delivery of SIG database to PIEC;<br>telephone conference with T. Martin re: same   | 0.30 |
| 10/24/17 | HBM | Email to trustee; conference with A. Lizotte re: MDL<br>issue; review latest case re: same  | 0.70 |
| 11/27/17 | AGL | Emails re: PIEC access to SIG   | 0.20 |
| 11/28/17 | AGL | Conference with C. Bennett re: PIEC access to SIG;<br>emails with T. Martin   | 0.20 |
| 11/29/17 | AGL | Email from W. Baldiga re: PIEC document request;<br>conference with Huron re: same  | 0.40 |
| 12/12/17 | AGL | Review hearing notice on injunction request in MDL  | 0.10 |
| 12/19/17 | AGL | Analysis of Court decision in triangular transactions   | 0.70 |
| 12/19/17 | CRB | Review Opinion in Dos Santos - summary judgment on  | 0.40 |



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| 12/19/17 | CRB | the Triangular Transaction as property of the Estates<br>Review Rule 9033 and extension of time required by<br>PIEC  | 0.60 |
| 12/19/17 | HBM | Review court decision re: triangular transaction;<br>conference with trustee re: same  | 0.80 |
| 12/20/17 | AGL | Additional review of Dos Santos decision; emails with<br>B. Baldiga re: objection to proposed findings; telephone<br>conference with trustee re: extension   | 0.50 |
| 12/20/17 | CRB | Telephone conference with W. Baldiga re: PIEC and<br>Dos Santos litigation   | 0.30 |
| 01/02/18 | AGL | Review letter from PIEC re: information request  | 0.20 |
| 01/02/18 | HBM | Review letter from W. Baldiga re: PIEC's request for<br>information; email to Trustee re: same   | 0.40 |
| 01/03/18 | CRB | Conference re: PIEC's request for information; and<br>telephone conference with W. Baldiga regarding same  | 0.70 |
| 01/05/18 | ANM | Conference with A. Lizotte re: class action domestic<br>defendants; create one (1) spreadsheet with all domestic<br>defendants listed with full addresses based upon<br>Amended Complaint; coordinate with C. Wilkins for<br>completion of project | 3.50 |
| 01/08/18 | AGL | Prepare for and attend call with PIEC re: information<br>request   | 0.80 |
| 01/08/18 | CRB | Conference call with PIEC regarding SIG information<br>and data  | 0.80 |
| 01/12/18 | AGL | Begin review of PIEC objection to proposed<br>findings/conclusions   | 1.20 |
| 01/15/18 | AGL | Emails with PIEC, C. Bennett re: document requests   | 0.30 |
| 01/15/18 | CRB | Review the PIEC objection to triangular transaction<br>findings  | 1.10 |
| 01/16/18 | AGL | Telephone conferences with T. Martin, K. Frocker re:<br>PIEC document/information requests   | 0.50 |
| 01/16/18 | AGL | Prepare for and attend conference with C. Bennett re:<br>Dos Santos litigation, appeal; begin outline of response  | 2.50 |
| 01/16/18 | CEW | Conference with A. Lizotte re: PEIC filing   | 0.10 |
| 01/16/18 | CRB | Conference with H. Murphy re: PIEC objection to<br>findings and conclusions on triangular transactions   | 0.20 |
| 01/16/18 | CRB | Telephone conference with T. Martin regarding PIEC<br>request for information  | 0.20 |
| 01/16/18 | CRB | Conference with H. Murphy re: response to PIEC<br>objection  | 0.60 |
| 01/16/18 | CRB | Conference with A. Lizotte to review PIEC objection,<br>the Court's Opinion; and outline of issues and approach  | 1.30 |
| 01/16/18 | CRB | Begin to outline response to PIEC objection; review<br>Trustee memorandum, objection and notes thereon   | 1.80 |
| 01/16/18 | HBM | Conference with C. Bennett re: PIEC's objection,<br>response, issues and strategy  | 0.30 |

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| 01/16/18 | HBM | Review PIEC's objection to proposed findings and rulings; review court decision; conference with C. Bennett and A. Lizotte re: same   | 3.80 |
| 01/17/18 | AGL | Review Dos Santos docket re: assembly of the record; conference with C. Wilkins; work on outline for response re: proposed findings/rulings   | 1.50 |
| 01/17/18 | CEW | Conference with A. Lizotte re: docket and PEIC filing; compare and contrast docket filings with PEIC filings to ensure accuracy; create spreadsheet of same for attorney review   | 1.70 |
| 01/18/18 | AGL | Work on appendix to response to proposed findings   | 0.20 |
| 01/18/18 | AGL | Conferences with H. Murphy, C. Bennett re: introduction to Dos Santos response  | 0.50 |
| 01/18/18 | AGL | Analysis of prior Dos Santos memos, order; review cases cited   | 6.00 |
| 01/18/18 | ANM | Conference with A. Lizotte re: Class action net winners asset search reports from 2018; begin to analyze 2016 asset search report as provide by Huron to ascertain duplicates; update spreadsheet to re: potential duplicates; brief follow-up with A. Lizotte re: findings | 1.50 |
| 01/18/18 | CRB | Conference with H. Murphy re: response to PIEC  | 0.40 |
| 01/18/18 | HBM | Conference with C. Bennett and A. Lizotte re: response; work on overview of response to PIEC's objection to court's proposed findings of fact and outline re: same  | 2.80 |
| 01/19/18 | AGL | Draft motion to extend response deadline - Dos Santos   | 0.40 |
| 01/19/18 | AGL | Begin drafting introductions to Dos Santos response; review new case; conference with H. Murphy re: same  | 4.50 |
| 01/19/18 | ANM | Begin to analyze 2018 asset search report as provide by Huron to ascertain real estate and vehicle assets re: class action domestic defendants; begin to draft spreadsheet to summarize finding relative to same  | 1.50 |
| 01/19/18 | ANM | Continue to analyze 2018 asset search report as provide by Huron to ascertain real estate and vehicle assets re: class action domestic defendants; continue to draft spreadsheet to summarize finding relative to same  | 3.50 |
| 01/19/18 | HBM | Conference with A. Lizotte re: issues and revisions to outline re: response to PIEC's objection; review latest case re: same  | 1.00 |
| 01/19/18 | HBM | Review recent cases and articles on fraudulent transfer, possession and identity of transfer; conference with A. Lizotte re: same   | 1.50 |
| 01/22/18 | AGL | Work on factual background - response to PIEC objection   | 4.20 |
| 01/22/18 | ANM | Continue to analyze 2018 asset search report as provide by Huron to ascertain real estate and vehicle assets re: class action domestic defendants; continue to draft  | 2.50 |

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| 01/22/18 | ANM | spreadsheet to summarize findings relative to same<br>Continue to analyze 2018 asset search report as provide<br>by Huron to ascertain real estate and vehicle assets re:<br>class action domestic defendants; continue to draft<br>spreadsheet to summarize findings relative to same | 3.50 |
| 01/23/18 | AGL | Email from PIEC re: request for transcripts  | 0.20 |
| 01/23/18 | AGL | Additional drafting of introduction, background -<br>response to proposed rulings in Dos Santos  | 4.50 |
| 01/23/18 | ANM | Continue to analyze 2018 asset search report as provide<br>by Huron to ascertain real estate and vehicle assets re:<br>class action domestic defendants; continue to draft<br>spreadsheet to summarize findings relative to same   | 3.00 |
| 01/23/18 | ANM | Continue to analyze 2018 asset search report as provide<br>by Huron to ascertain real estate and vehicle assets re:<br>class action domestic defendants; continue to draft<br>spreadsheet to summarize findings relative to same   | 3.50 |
| 01/23/18 | CRB | Work on Opposition to PIEC Appeal  | 1.90 |
| 01/24/18 | AGL | Search for documents requested by PIEC; conference<br>with C. Bennett  | 0.80 |
| 01/24/18 | AGL | Work on background section to Dos Santos response  | 1.00 |
| 01/24/18 | ANM | Continue to analyze 2018 asset search report as provide<br>by Huron to ascertain real estate and vehicle assets re:<br>class action domestic defendants; continue to draft<br>spreadsheet to summarize findings relative to same   | 2.50 |
| 01/24/18 | ANM | Continue to analyze 2018 asset search report as provide<br>by Huron to ascertain real estate and vehicle assets re:<br>class action domestic defendants; continue to draft<br>spreadsheet to summarize findings relative to same   | 3.50 |
| 01/24/18 | CRB | Response to PIEC request for documents; and telephone<br>conference with W. Baldiga  | 0.20 |
| 01/24/18 | CRB | Revise background statement in opposition to PIEC<br>appeal  | 1.80 |
| 01/24/18 | CRB | Work on drafting reply to PIEC appeal for the Dos<br>Santos Judgment   | 2.60 |
| 01/25/18 | AGL | Draft argument on PIEC response to proposed rulings<br>by Bankruptcy Court   | 5.50 |
| 01/25/18 | ANM | Continue to analyze 2018 asset search report as provide<br>by Huron to ascertain real estate and vehicle assets re:<br>class action domestic defendants; continue to draft<br>spreadsheet to summarize findings relative to same   | 2.30 |
| 01/25/18 | ANM | Continue to analyze 2018 asset search report as provide<br>by Huron to ascertain real estate and vehicle assets re:<br>class action domestic defendants; continue to draft<br>spreadsheet to summarize findings relative to same   | 2.30 |
| 01/25/18 | CRB | Work on opposition to PIEC appeal; and draft<br>procedural statement   | 1.90 |

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| 01/26/18 | AGL | Work on first draft of response to proposed rulings; conference with C. Bennett re: same   | 4.50 |
| 01/26/18 | ANM | Continue to analyze 2018 asset search report as provide by Huron to ascertain real estate and vehicle assets re: class action domestic defendants; continue to draft spreadsheet to summarize findings relative to same                                  | 3.50 |
| 01/26/18 | ANM | Complete analysis of 2018 asset search report as provide by Huron to ascertain real estate and vehicle assets re: class action domestic defendants; finalize spreadsheet; relative to same; brief conference with A. Lizotte re: findings and next steps | 3.50 |
| 01/26/18 | CRB | Further edits to opposition  | 0.70 |
| 01/26/18 | CRB | Review draft brief in opposition to PIEC appeal; and conference with A. Lizotte regarding same   | 1.60 |
| 01/26/18 | HBM | Work on response to PIEC's objection   | 2.50 |
| 01/29/18 | AGL | Work on revisions to response to proposed rulings; conferences with H. Murphy, C. Bennett re: same   | 4.50 |
| 01/29/18 | ANM | Conference with T. Folkman re: domestic defendants' assets search results relative to potential real estate and vehicle attachment; analyze T. Folkman list itemizing state jurisdiction for research on attachment law and procedures                   | 0.50 |
| 01/29/18 | CRB | Conference with A. Lizotte and H. Murphy to review and discuss the strategy and editing of the opposition to the PIEC appeal; and follow-up conference with A. Lizotte   | 2.20 |
| 01/29/18 | HBM | Work on response to PIEC's objection to proposed findings; review first draft and revise same; conference with C. Bennett and A. Lizotte re: same  | 5.00 |
| 01/30/18 | AGL | Email to K. Fisher re: Back Office, notice lists   | 0.30 |
| 01/30/18 | AGL | Develop argument section on response to proposed rulings   | 3.00 |
| 01/31/18 | AGL | Work on argument - response to proposed rulings in Dos Santos  | 3.00 |
| 02/01/18 | AGL | Work on response to proposed rulings; conference with H. Murphy, C. Bennett re: same   | 5.00 |
| 02/01/18 | CRB | Draft revised opening argument   | 1.80 |
| 02/01/18 | CRB | Work on brief in support of proposed findings and rulings  | 3.10 |
| 02/01/18 | HBM | Review and revise draft of response to PIEC's objection to proposed findings; conference with A. Lizotte re: same  | 4.80 |
| 02/02/18 | AGL | Legal research re: transfers, in pari delicto  | 2.00 |
| 02/02/18 | AGL | Draft revisions to response to proposed rulings - Dos Santos   | 4.00 |
| 02/02/18 | HBM | Further work on opposition to PIEC's objection   | 1.50 |

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| 02/05/18 | AGL | Additional work drafting response to proposed rulings - Dos Santos; conferences with H. Murphy, C. Bennett re: same  | 7.00 |
| 02/05/18 | CMC | Further research re: constructive possession; review Court Opinion re: same  | 1.80 |
| 02/05/18 | CMC | Research regarding constructive possession issues relating to motion to reconsider post-judgment findings  | 1.90 |
| 02/05/18 | CRB | Conference with A. Lizotte to review response; and edits and revisions thereto   | 0.70 |
| 02/05/18 | CRB | Review revised response to PIEC's appeal of bankruptcy findings  | 2.10 |
| 02/05/18 | CRB | Conference with H. Murphy re: brief  | 2.40 |
| 02/05/18 | HBM | Work on revisions to latest draft of opposition; extended telephone conference with A. Lizotte and C. Bennett re: same   | 4.80 |
| 02/05/18 | MKO | Research re: in pari delicto and avoidance actions; memo to A. Lizotte re: same  | 1.50 |
| 02/06/18 | AGL | Work on response to proposed rulings - Dos Santos  | 4.00 |
| 02/06/18 | CMC | Further research re: constructive possession issues  | 0.90 |
| 02/06/18 | CMC | Research and draft memorandum regarding constructive possession issues re: triangle transactions for response to Dos Santos objection; review issues re: same                  | 3.30 |
| 02/06/18 | CRB | Conference regarding application of in pari delicto and constructive possession; and follow-up review of issues and context for research                                       | 0.80 |
| 02/06/18 | CRB | Review memorandum regarding application of in pari delicto and constructive possession to triangular transactions; and notes regarding application by PIEC to Trustee standing | 0.80 |
| 02/06/18 | MKO | Review 3rd amended complaint and memo to A. Lizotte re: same with information for memorandum of law  | 0.30 |
| 02/06/18 | MKO | Research re: judicial notice; memo to A. Lizotte re: same  | 0.50 |
| 02/06/18 | MKO | Review research re: in pari delicto for avoidance actions; draft memo to C. Bennett re: same   | 3.20 |
| 02/07/18 | AGL | Revisions to response brief - Dos Santos; conferences with H. Murphy, C. Bennett re: same  | 6.50 |
| 02/07/18 | CMC | Finalize research re: constructive possession for response; conference with A. Lizotte re: same re: brief  | 1.80 |
| 02/07/18 | CRB | Conference with H. Murphy regarding brief; and edits; and draft revised section  | 2.90 |
| 02/07/18 | CRB | Draft insert on constructive possession; review and edit brief; conference with A. Lizotte   | 3.10 |
| 02/07/18 | HBM | Telephone call with trustee re: case status and yesterday's meeting  | 0.30 |
| 02/07/18 | HBM | Review law and memos on (1) constructive possession  | 1.80 |

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| 02/07/18 | HBM | (2) in pari delicto for avoidance actions re: same<br>Review and revise latest draft of opposition to PIEC's<br>objection; conference with A. Lizotte and C. Bennett re:<br>same | 3.00 |
| 02/07/18 | MKO | Review cases re: fraud transfer and possession   | 0.50 |
| 02/08/18 | AGL | Revisions to response brief - Dos Santos; research 105<br>case law; Insert fact citations  | 7.00 |
| 02/08/18 | CRB | Conference with A. Lizotte re: edits and cites to the<br>record  | 0.40 |
| 02/08/18 | CRB | Conference with H. Murphy; edits and revisions; and<br>prepare edits   | 3.10 |
| 02/08/18 | HBM | Review and revisions to latest draft of opposition;<br>review with A. Lizotte re: same   | 3.00 |
| 02/08/18 | MKO | Review research for draft memo to A. Lizotte and C.<br>Bennett re: in pari delicto avoidance action  | 1.00 |
| 02/09/18 | AGL | Final revisions to response brief - Dos Santos;<br>conferences with H. Murphy, C. Bennett re: same;<br>arrange for filing  | 6.20 |
| 02/09/18 | CRB | Final edits and comments to response to PIEC objection<br>to Bankruptcy Court findings and rulings   | 0.40 |
| 02/09/18 | HBM | Final review and revisions to response to PIEC's<br>objection; several conferences with A. Lizotte re: same  | 2.50 |
| 02/22/18 | AGL | Telephone conference with Trustee re: status of PIEC<br>action   | 0.20 |
| 02/22/18 | AGL | Conference with K. Fisher, H. Murphy re: reply in Dos<br>Santos action   | 0.20 |
| 02/23/18 | HBM | Review reply brief of PIEC objection to proposed<br>findings; brief conference with C. Bennett re: same  | 1.00 |
| 02/26/18 | AGL | Analysis of draft reply by PIEC re: Dos Santos proposed<br>findings; conference with H. Murphy, C. Bennett re:<br>same   | 1.00 |
| 02/26/18 | AGL | Begin drafting sur-reply   | 4.00 |
| 02/26/18 | CRB | Reply to PIEC's reply brief; conference with H. Murphy<br>and A. Lizotte regarding same and possible sur-reply   | 1.10 |
| 02/26/18 | HBM | Prepare outline for reply; conference with C. Bennett<br>and A. Lizotte re: same; telephone call with trustee re:<br>same  | 2.00 |
| 02/26/18 | MKO | Review transcripts re: motion for Trustee to intervene in<br>MDL motion; memo to A. Lizotte re: same   | 0.50 |
| 02/27/18 | AGL | Work on sur-reply Dos Santos action; conference with<br>C. Bennett re: same; draft motion for leave to file  | 2.50 |
| 02/27/18 | AGL | Research cases on Ponzi schemes - possession issue   | 3.00 |
| 02/27/18 | CRB | Further revisions to sur-reply   | 0.60 |
| 02/28/18 | AGL | Work on sur-reply; research new cases on transfers;<br>conference with H. Murphy, C. Bennett   | 2.00 |
| 02/28/18 | CRB | Edit sur-reply; and review recent S. Ct. case re: 546(e)   | 0.60 |

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| 02/28/18 | CRB | Conference with H. Murphy and A. Lizotte re: sur-reply brief  | 1.40 |
| 02/28/18 | HBM | Review revised draft sur-reply to PIEC's response to our reply re: proposed findings; conference with C. Bennett and A. Lizotte re: issues and revisions with draft | 2.70 |
| 03/01/18 | AGL | Legal research re: constructive possession cases  | 2.00 |
| 03/01/18 | AGL | Work on sur-reply - Dos Santos action   | 3.50 |
| 03/01/18 | CRB | Review and revise Sur-reply   | 0.60 |
| 03/02/18 | AGL | Final revisions to sur-reply; conferences with H. Murphy, C. Bennett re: same   | 4.50 |
| 03/02/18 | CRB | Work on revised Sur-reply   | 0.90 |
| 03/02/18 | HBM | Final review and revisions to draft sur reply; 2 conferences with A. Lizotte re: same   | 1.80 |
| 03/07/18 | AGL | Conference with C. Bennett re: trust, commingling issues  | 0.30 |
| 03/07/18 | AGL | Check docket re: status of Dos Santos action  | 0.30 |
| 03/15/18 | AGL | Review order authorizing sur-reply in Telexfree; arrange for filing   | 0.20 |
| 03/16/18 | CRB | Review Gorton, J. Opinion on Motion to Dismiss of Sloan and De La Rosa  | 0.20 |
| 03/19/18 | AGL | Review order in SEC case on motions to dismiss  | 0.30 |
| 03/19/18 | MKO | Review SEC decision of Faith Sloane and Santiago De La Rosa motion to dismiss; memo to A. Lizotte re: same  | 1.00 |
| 03/20/18 | AGL | Telephone conference with K. Fisher re: Huron expert report   | 0.10 |

| <u>Attorney</u>         | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|-------------------------|--------------|-------------|---------------|
| ANDREA N. MAZZARELLA    | 40.60        | 225.00      | 9,135.00      |
| ANDREW G. LIZOTTE       | 37.60        | 595.00      | 22,372.00     |
| ANDREW G. LIZOTTE       | 115.90       | 615.00      | 71,278.50     |
| CHARLES R. BENNETT, JR. | 50.80        | 625.00      | 31,750.00     |
| CHRISTINE E. WILKINS    | 1.80         | 225.00      | 405.00        |
| CHRISTOPHER M. CONDON   | 0.60         | 485.00      | 291.00        |
| CHRISTOPHER M. CONDON   | 9.70         | 500.00      | 4,850.00      |
| HAROLD B. MURPHY        | 55.60        | 625.00      | 34,750.00     |
| MICHAEL K. O'NEIL       | 1.30         | 345.00      | 448.50        |
| MICHAEL K. O'NEIL       | 8.50         | 360.00      | 3,060.00      |

**Total Fees**

**\$178,340.00**



EXHIBIT F

SERVICES RELATING TO OTHER AVOIDANCE ACTIONS

| <u>Date</u> | <u>Atty</u> | <u>Description</u>  | <u>Hours</u> |
|-------------|-------------|---|--------------|
| 03/01/17    | AGL         | Review Advent response to document production; telephone conference with Vernon Jolley re: Advent discovery, settlement   | 0.80         |
| 03/02/17    | AGL         | Telephone conference with Trustee re: ISG, case status  | 0.20         |
| 03/03/17    | AGL         | Emails re: ISG settlement payment   | 0.10         |
| 03/08/17    | AGL         | Emails re: wire instructions for Infinium payment   | 0.10         |
| 03/09/17    | AGL         | Email from T. Betlejewski re: stipulation of dismissal  | 0.10         |
| 03/09/17    | AGL         | Telephone conference with W. Hanlon re: Nehra deposition  | 0.20         |
| 03/10/17    | AGL         | Telephone conference with D. Bernstein re: Craft/Sanderley updates; review SEC proposed revisions to Sanderley settlement documents; work on agreement and motion | 2.00         |
| 03/14/17    | AGL         | Review draft Craft settlement documents; conference call with SEC re: same  | 2.00         |
| 03/16/17    | AGL         | Telephone conference to Vernon Jolley re: status of Advent case   | 0.20         |
| 03/20/17    | AGL         | Conference with C. Bennett re: status of Wanzeler action  | 0.20         |
| 03/20/17    | AGL         | Telephone conference with D. Bernstein re: Sanderley 1099 issues  | 0.20         |
| 03/20/17    | AGL         | Prepare for and attend conference call with SEC, Craft re: revisions to settlement documents  | 1.00         |
| 03/23/17    | AGL         | Telephone conference with trustee re: Nehra suit  | 0.20         |
| 03/24/17    | AGL         | Review docket re: closure of Infinium adversary proceeding  | 0.10         |
| 03/24/17    | AGL         | Telephone conference with Bill Hanlon re: dismissal of case   | 0.10         |
| 03/24/17    | AGL         | Draft stipulation of dismissal - Nehra  | 0.20         |
| 03/27/17    | AGL         | Review notice/service issues in Wanzeler action   | 0.80         |
| 03/27/17    | AGL         | Review executed Sanderley consent and email re: same; conference with D. Bernstein re: same, timing of deal; revise Sanderley agreement                           | 1.00         |
| 03/28/17    | AGL         | Work on revisions to Sanderley deal; telephone conference with D. Bernstein re: same  | 0.70         |
| 03/29/17    | AGL         | Telephone conference with D. Bernstein re: revisions to   | 0.30         |

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|          |     | Sanderley deal, approval issues   |      |
| 03/30/17 | AGL | Edits to Sanderley settlement agreement and motion;<br>emails to R. Eckard, SEC re: same  | 0.60 |
| 04/10/17 | AGL | Telephone conference with D. Bernstein re: Sanderley<br>deal status   | 0.20 |
| 04/11/17 | AGL | Telephone conference with Vernon Jolley re: Advent<br>negotiations  | 0.40 |
| 04/11/17 | AGL | Review and consider revised Craft-SEC settlement<br>documents   | 0.80 |
| 04/13/17 | AGL | Review notice of inactivity - Sunwind; conference with<br>C. Bennett, L. Dwyer re: same   | 0.30 |
| 04/18/17 | AGL | Review show cause order in Opt3 matter  | 0.10 |
| 04/18/17 | AGL | Conference with C. Bennett re: status of Top Notch deal   | 0.20 |
| 04/18/17 | CRB | Conference with A. Lizotte regarding Sunwind and<br>notice of inactivity in the Top Notch injunction  | 0.30 |
| 04/19/17 | AGL | Work on status report in Sunwind/Top Notch; review<br>docket  | 0.20 |
| 04/19/17 | AGL | Review status of Sanderley deal   | 0.50 |
| 04/20/17 | AGL | Telephone conference with D. Bernstein re: internal<br>approval for SEC deal; final edits to motion   | 0.50 |
| 04/20/17 | AGL | Draft response to Sunwind notice inactivity and request<br>for judgment; revise form of judgment  | 2.00 |
| 04/21/17 | AGL | Telephone conferences with D. Bernstein re: De La<br>Rosa negotiations  | 0.20 |
| 04/21/17 | AGL | Conferences with SEC, C. Bennett re: revisions to<br>Sanderley settlement and motion; revise documents;<br>review proposed SEC judgment, issues with removing<br>SEC as party; emails to R. Eckard re: same | 3.00 |
| 04/25/17 | AGL | Receive signature on Sanderley deal' arrange to file<br>pleadings   | 0.30 |
| 04/26/17 | AGL | Telephone conference with D. Bernstein re: Sanderley<br>deal; review deeds; email to F. Mazar re: execution of<br>deeds in escrow   | 0.30 |
| 04/27/17 | AGL | Finalize Sunwind response to notice of inactivity   | 0.30 |
| 05/03/17 | AGL | Review order on OPT3 withdrawal of counsel  | 0.10 |
| 05/03/17 | AGL | Review order and judgment in Sunwind action   | 0.20 |
| 05/05/17 | AGL | Draft/file renewed motion to default Opt 3 and affidavit  | 0.50 |
| 05/05/17 | AGL | Review financial affidavit from Jolley/Advent;<br>telephone conference to Vernon Jolley re: same  | 0.50 |
| 05/08/17 | AGL | Assemble documents from Craft SEC deal; review<br>SEC/Craft deal documents  | 0.80 |
| 05/10/17 | AGL | Telephone conference with D. Bernstein re: PIEC<br>response to Sanderley, status of Craft deal  | 0.30 |
| 05/10/17 | AGL | Review PIEC response to Sanderley settlements;<br>conference with H. Murphy, Trustee re: same   | 0.60 |
| 05/10/17 | HBM | Review responses by PEIC to motion to settle with S.  | 0.50 |

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|          |     | Rodriguez; conference with A. Lizotte re: same; email to trustee re: same   |      |
| 05/17/17 | AGL | Telephone conference with D. Bernstein re: Dela Rosa, Sloan negotiations  | 0.30 |
| 05/17/17 | AGL | Telephone conference and emails with SEC, trustee re: Sanderley settlement; review Sanderley motion to self deport; review docket re: deal status; telephone conference to Court; review deal implementation issues | 1.20 |
| 05/17/17 | MKO | Review Sanderley Rodrigues agreement to judgment in SEC matter; memo to H. Murphy, C. Bennett and A. Lizotte re: same   | 1.30 |
| 05/18/17 | AGL | Telephone conference with trustee re: Sanderley deal  | 0.10 |
| 05/22/17 | AGL | Work on service in Top Notch adversary  | 0.20 |
| 05/23/17 | AGL | Work on revised Craft settlement agreement  | 2.00 |
| 05/24/17 | HBM | Conference with A. Lizotte re: hearing re: Craft and issues with SEC  | 0.40 |
| 05/25/17 | AGL | Telephone conference with SEC re: new order in Sanderley action   | 0.10 |
| 05/25/17 | AGL | Review Sanderley district court judgment; emails to SEC, Trustee re: consummating settlement; conference with J. O'Brien re: recording deeds  | 0.80 |
| 05/25/17 | AGL | Draft opposition to PIEC motion for injunction against Craft; research dockets, pleadings   | 2.50 |
| 05/25/17 | JFO | Email correspondence with J. Ontell regarding Florida counsel to assist record in Palm Beach and Polk County  | 0.40 |
| 05/26/17 | AGL | Emails re consummation of Rodriguez settlement; telephone conference with trustee re: same  | 0.30 |
| 05/26/17 | AGL | Draft motion for default judgment and judgment/Opt 3  | 0.80 |
| 05/30/17 | AGL | Emails with H. Murphy, R. Darcheno re: Sunwind  | 0.30 |
| 05/30/17 | AGL | Edit default judgment pleadings - Opt3 and certificate of service   | 0.30 |
| 05/30/17 | HBM | Emails to PIEC re: Sunwind and Craft  | 0.30 |
| 05/31/17 | AGL | Email with F. Mauzar re: consummation of Sanderley settlement; reconcile with terms of stipulation; email, telephone conference to Huron, Trustee   | 0.50 |
| 05/31/17 | HBM | Conference with A. Lizotte re: S. Rodrigues settlement and issues re: Florida property  | 0.30 |
| 05/31/17 | JFO | Correspondence with attorneys and title companies in Palm Beach County and Polk County regarding recording deeds and requirements to record   | 1.00 |
| 06/01/17 | AGL | Emails to F. Mauzar, Huron re: status of Sanderley account turnovers  | 0.20 |
| 06/02/17 | AGL | Review photos of Florida properties; conference with J. O'Brien re: recordation issues  | 0.20 |
| 06/12/17 | AGL | Emails with Huron re: Singapore recoveries; emails and telephone conference with trustee, Huron re: Sanderley   | 0.40 |

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|          |     | settlement funds   |      |
| 06/19/17 | AGL | Telephone conference with D. Bernstein, Huron re: Sanderley bank accounts  | 0.30 |
| 06/23/17 | AGL | Work on Craft settlement pleadings   | 2.00 |
| 07/05/17 | AGL | Review judgment in OPT3 litigation   | 0.10 |
| 07/05/17 | AGL | Work on Craft settlement pleadings   | 0.50 |
| 07/06/17 | AGL | Email with J. Craft re: deal status  | 0.10 |
| 07/06/17 | AGL | Review quarterly report from Sunwind   | 0.20 |
| 07/11/17 | AGL | Telephone conference with D. Bernstein re: Craft deal; conference with Dwyer re: same; revise pleadings  | 1.50 |
| 07/11/17 | CEW | Review files received from Brazilian court re: potential service on defendants in Darr v. Wanzeler   | 0.70 |
| 07/12/17 | AGL | Edits to Craft settlement and email re: same; receive executed document; arrange for filing and service  | 0.60 |
| 07/12/17 | CEW | Continue to review court docket and documents received from court in Brazil re: potential service on defendants in Darr v. Wanzeler  | 2.20 |
| 07/13/17 | AGL | Work on Craft settlement service   | 0.20 |
| 07/13/17 | CEW | Continue review of court docket and documents received from court in Brazil re: potential service on defendants in Darr v. Wanzeler  | 1.50 |
| 07/14/17 | AGL | Emails with SEC, Trustee re: Sanderley bank accounts   | 0.20 |
| 07/14/17 | AGL | Conference with C. Wilkins re: service in Wanzeler 4032 action   | 0.20 |
| 07/14/17 | CEW | Continue review of court docket and documents received from court in Brazil re: potential service on defendants in Darr v. Wanzeler  | 2.00 |
| 07/17/17 | AGL | Review letter rotatory decision in Wanzeler case   | 0.20 |
| 07/25/17 | AGL | Conference with C. Wilkins re: foreign service in Wanzeler action; review writs of service   | 0.30 |
| 07/25/17 | CEW | Review translations of service on defendants in Brazil re: Darr v. Wanzeler; print same for attorney review  | 0.20 |
| 07/27/17 | AGL | Review docket in AP 16-4080; draft status report and dismissal of Court II in Sunwind-Top Notch action   | 0.60 |
| 07/27/17 | CEW | Draft notice of filing of service on defendants in Darr v. Wanzeler; conference with A. Lizotte re: same; update foreign defendant service chart with service and answer dates | 0.40 |
| 07/28/17 | AGL | Revise Sunwind status report and notice of dismissal   | 0.30 |
| 08/07/17 | AGL | Review Advent tax return   | 0.20 |
| 08/09/17 | AGL | Review order on Craft settlement; telephone conference with D. Bernstein re: same; email to trustee re: same   | 0.30 |
| 08/14/17 | AGL | Analysis of submissions by defendant in Advent matter; email to trustee re: case options   | 1.00 |
| 08/15/17 | AGL | Draft Advent stipulation of dismissal and email re: same   | 0.30 |
| 08/21/17 | ANM | Conference with A. Lizotte re: 4506 San Mellina,   | 1.20 |

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|          |     | Coconut Creek, FL and 10556 Cape Delabra Court, Boynton Beach, FL; research Broward County tax assessor to ascertain current ownership and sales history; research Broward County Registry of Deeds re: Fabio Wanzeler and Claudia Caires-Wanzeler; obtain, assemble and organize deeds and any liens; analyze same; update Telex property listing index to include findings re: 4506 San Mellina, Coconut Creek, FL; follow-up with A. Lizotte re: sale comps; conduct general Zillow search and obtain sales comps and summary re: 4506 San Mellina, Coconut Creek, FL |      |
| 08/21/17 | ANM | Research Palm Beach County tax assessor to ascertain current ownership and sales history re 10556 Cape Delabra Court, Boynton Beach, FL; research Palm Beach County Registry of Deeds re: Fabio Wanzeler and Claudia Caires-Wanzeler; obtain, assemble and organize deeds and any liens; analyze same; update Telex property listing index to include findings re: same; follow-up with A. Lizotte re: sale comps; conduct general Zillow search and obtain sales comps and summary re: 10556 Cape Delabra Court, Boynton Beach, FL                                      | 1.20 |
| 08/22/17 | CEW | Assemble all documents for filing of summons of B. Cardoso re: Darr v. Wanzeler; update hard copy files with same  | 0.20 |
| 08/23/17 | AGL | Email from V. Jolley re: Advent settlement; arrange for filing   | 0.30 |
| 08/24/17 | CEW | Update foreign defendant service chart re: Darr v. Wanzeler for attorney review; conference with P. Moniello re: same  | 0.20 |
| 08/25/17 | AGL | Telephone conference and email to D. McCormack re: F. Wanzeler data  | 0.30 |
| 08/28/17 | AGL | Telephone conference from Prime Shares re: Sunwind indebtedness  | 0.20 |
| 08/30/17 | AGL | Draft status conference request for 4032 action; review status of service, review docket   | 0.80 |
| 08/30/17 | CRB | Conference regarding Wanzeler, et al. and Citizens   | 0.40 |
| 08/31/17 | AGL | Conference with H. Murphy re: latest Sunwind proposal; review email, attachments, option agreement, APA; telephone conference with trustee re: same; emails with Joe Craft   | 2.20 |
| 08/31/17 | HBM | Review emails and documents re: Sunwind; conference with A. Lizotte re: same   | 0.80 |
| 09/05/17 | AGL | Telephone conference with M. Murrane re: Fabio Wanzeler  | 0.10 |
| 09/05/17 | AGL | Conference with C. Wilkins re: status of 4032 action,  | 0.30 |

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|          |     | service  |      |
| 09/05/17 | AGL | Telephone conference with L. Dwyer re: status of Sunwind deals; prepare for and attend call with NRS/Patrick re: same  | 0.70 |
| 09/05/17 | CEW | Review email from A. Lizotte re: Darr v. Wanzeler; review draft of request for status conference; review defendant service chart re: same and revise; conference with A. Lizotte re: same and domestic and foreign service | 0.60 |
| 09/06/17 | AGL | Prepare for and attend conference call with M. Murrane re: Fabio Wanzeler negotiations   | 0.80 |
| 09/07/17 | AGL | Analysis of two Sunwind deal proposals; conference call with Joe Craft re: same; email to D. Bernstein   | 2.20 |
| 09/07/17 | CEW | Conference with P. Moniello re: foreign and domestic defendants in Darr v. Wanzeler  | 0.20 |
| 09/08/17 | CEW | Update foreign defendant service chart re: Darr v. Wanzeler  | 0.40 |
| 09/12/17 | AGL | Review USDC Craft judgment and Merrill judgment; telephone conference with D. Bernstein re: same; Emails to Joe Craft; trustee re: same  | 0.80 |
| 09/15/17 | AGL | Review status of adversary proceedings   | 0.30 |
| 09/20/17 | CEW | Review documents received from Brazil re: L. Ferreira in Darr v. Wanzeler  | 0.70 |
| 09/21/17 | AGL | Conference with C. Wilkins re: service on Luis Ferreira; review constable notations - fictitious name  | 0.40 |
| 09/21/17 | CEW | Conference with A. Lizotte re: L. Ferreira; scan and forward same to attorney for review; email to translator for estimate; update foreign defendant chart   | 1.10 |
| 09/26/17 | AGL | Email from Jen Craft re: turnover of funds   | 0.10 |
| 09/26/17 | CEW | Conference with A. Lizotte re: documents received from Brazil re: L. Ferreira; email translators re: translation of same   | 0.20 |
| 09/28/17 | AGL | Telephone conferences with Jon Craft, T. Martin re: Craft settlement, Sunwind status; review terms of Craft settlement agreement, SEC judgment   | 1.00 |
| 10/02/17 | AGL | Telephone conference with trustee re: Craft settlement   | 0.20 |
| 10/10/17 | AGL | Review Sunwind quarterly progress  | 0.20 |
| 10/18/17 | AGL | Emails with J. Craft re: Sunwind; conference with counsel re: deal status; telephone conference with buyer re: same  | 0.70 |
| 10/19/17 | AGL | Telephone conference with trustee re: SEC inquiries on Sanderley deal  | 0.20 |
| 10/25/17 | AGL | Telephone conference with D. Bernstein re: status of SEC action, consent order, possible settlements; email to C. Bennett re: same   | 0.40 |
| 10/27/17 | AGL | Review updated proposal from Sunwind; telephone  | 1.50 |

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|          |     | conference with trustee re: same; conference with C. Bennett re: same; draft memo   |      |
| 10/27/17 | MKO | Review case law and other applicable law re: fraudulent transfer Section 550 liability  | 2.50 |
| 10/27/17 | MKO | Draft memo re: fraudulent transfer Section 550 initial vs. subsequent transferee  | 2.80 |
| 10/30/17 | AGL | Telephone conference with trustee, Sunwind re: latest offer   | 0.20 |
| 10/30/17 | MKO | Continue review of case law and draft memo re: subsequent vs. initial transferee in Section 550   | 3.00 |
| 11/01/17 | CEW | Telephone conference with bankruptcy clerk's office re: documents received in Darr v. Wanzeler; conference with Canon Business re: retrieval of same  | 0.10 |
| 11/06/17 | MKO | Review and revise memo re: Wall design and Section 550 transferee   | 2.30 |
| 11/07/17 | CEW | Review documents and compact disc received from Brazil re: R. Alves in Darr v. Wanzeler; begin review of docket and filings on compact disc re: determine if service effected on defendant  | 1.10 |
| 11/13/17 | AGL | Review De la Rosa motion to dismiss SEC case and supporting memorandum; conference with D. Bernstein re: same   | 1.00 |
| 11/13/17 | CEW | Review documents received from Brazil re: n Darr v. Wanzeler  | 0.50 |
| 12/04/17 | CEW | Review document received from Brazil re: Darr v. Wanzeler   | 0.80 |
| 12/05/17 | AGL | Conference with C. Wilkins re: service returns in 4032 action, Wanzeler, Costs  | 0.30 |
| 12/07/17 | CEW | Retrieve docket in Darr v. Wanzeler; review C. Wanzeler's answer date; conference with A. Lizotte re: translation quote for returns; update hard copy files   | 0.40 |
| 12/11/17 | AGL | Telephone conference with T. Keuler re: Sunwind deal  | 0.10 |
| 12/14/17 | AGL | Telephone conference from D. Bernstein re: status of IRS dispute, Crosby litigation   | 0.80 |
| 12/20/17 | AGL | Telephone conference with T. Keuler re: case  | 0.10 |
| 01/02/18 | AGL | Email to C. Bennett re: status of Wanzeler action   | 0.20 |
| 01/08/18 | AGL | Review Craft update on Sunwind development  | 0.20 |
| 01/08/18 | AGL | Telephone conference with D. Bernstein re: Crosby settlement  | 0.20 |
| 01/08/18 | CEW | Conference with J. O'Brien re: certified copy of purchase and sale needed for closing; travel to Bankruptcy Court to obtain same; conference with J. O'Brien re: same conference with A. Lizotte re: service on defendants in Brazil in Darr v. Wanzeler; draft certificates of service for filing; organize translations to accompany filing | 1.30 |



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| 01/17/18 | AGL | Telephone conference with D. Bernstein re: Randy Crosby settlement  | 0.40 |
| 01/18/18 | AGL | Telephone conference with trustee re: status of Crosby settlement   | 0.20 |
| 01/22/18 | AGL | Analysis of draft SEC settlement with Crosby;   | 1.00 |
| 01/22/18 | HBM | telephone conference from Deena Bernstein re: same  |      |
| 01/22/18 | HBM | Conference with A. Lizotte re: issues and structure of Crosby deal  | 0.30 |
| 01/23/18 | AGL | Review/revise Crosby consent judgment; work on carve out language; lengthy telephone conference with D. Bernstein re: same; conference with H. Murphy re: same  | 1.30 |
| 01/26/18 | AGL | Draft memo to trustee re: terms of SEC/Crosby deal; telephone conference with D. Bernstein re: same   | 0.60 |
| 02/05/18 | AGL | Telephone conference with Sunwind re: latest proposal   | 0.10 |
| 02/12/18 | AGL | Analysis of updated Sunwind proposal  | 2.00 |
| 02/14/18 | AGL | Telephone conference with trustee re: Sunwind deal comments   | 0.30 |
| 02/20/18 | AGL | Telephone conference with T. Keuler re: terms of new Sunwind proposal   | 0.50 |
| 02/20/18 | AGL | Emails with D. Bernstein re: Crosby deal; review updated SEC judgment, consent; begin drafting settlement agreement   | 2.50 |
| 02/22/18 | AGL | Edits to Crosby settlement documents; conference with H. Murphy, D. Bernstein re: same  | 0.80 |
| 02/22/18 | HBM | Review and revise Crosby settlement papers; conference with A. Lizotte re: same   | 0.50 |
| 02/27/18 | AGL | Work on revisions to Crosby settlement; conference with trustee   | 0.50 |
| 02/27/18 | HBM | Review and revise stipulation with Crosby; conference with A. Lizotte re: same; review latest from SEC re: same   | 0.70 |
| 02/28/18 | AGL | Work on Trustee edits to Crosby settlement documents  | 0.30 |
| 03/05/18 | AGL | Telephone conference with T. Keuler re: Sunwind deal revisions  | 0.20 |
| 03/05/18 | AGL | Telephone conference with D. Bernstein re: Crosby, DeLa Rosa deal status  | 0.40 |
| 03/06/18 | AGL | Review Crosby proposed revisions to settlement documents; work on revisions; email to Trustee, SEC re: same   | 0.80 |
| 03/07/18 | AGL | Conference with C. Bennett re: status of Wanzeler/related party adversary; review service issues; telephone conference with Huron   | 1.00 |
| 03/07/18 | CEW | Conference with A. Lizotte re: service on foreign defendants in Darr v. Wanzeler; analyze service chart, docket and hard copy files re: same; update foreign defendant service chart and hard copy files accordingly; | 1.30 |

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|          |     | review documents returned from China re: Darr v. Alecci; update foreign defendant service chart and hard copy files accordingly                     |      |
| 03/07/18 | CRB | Email re: summary of issues for manual credit litigation  | 0.30 |
| 03/07/18 | CRB | Review Wanzeler/manual credit litigation  | 0.60 |
| 03/08/18 | AGL | Review Faria motion to dismiss and opposition   | 0.50 |
| 03/08/18 | AGL | Review pleadings filed in Wanzeler 4032 action and discovery requirements; memo from C. Bennett re: same  | 1.00 |
| 03/09/18 | AGL | Review status of implementation of Craft settlement   | 0.40 |
| 03/09/18 | AGL | Perform due diligence on Sunwind proposal   | 0.60 |
| 03/09/18 | AGL | Review revised sale/settlement documents re: Sunwind; conferences with C. Bennett re: same  | 2.00 |
| 03/09/18 | CRB | Review Sunwind proposed sale documents; and conference with A. Lizotte  | 1.40 |
| 03/12/18 | AGL | Email to S. Kelly re: Crosby settlement edits   | 0.20 |
| 03/14/18 | AGL | Work on redline of Crosby agreement; emails with S. Kelly re: same  | 0.30 |
| 03/14/18 | AGL | Review updated versions of Sunwind deal documents; telephone conferences with Tom Kueller, Ben Klassen re: same; revise consent and acknowledgement | 1.30 |
| 03/15/18 | AGL | Draft revisions to Sunwind representatives letter   | 0.40 |
| 03/15/18 | AGL | Telephone conference with T. Kueller re: revisions to Sunwind deal  | 0.50 |
| 03/15/18 | AGL | Begin drafting motion to settle with Sunwind  | 1.50 |
| 03/16/18 | AGL | Emails and telephone conferences with SEC, Sarah Kelly re: status of Crosby deal  | 0.20 |
| 03/16/18 | AGL | Review order on limiting notice of settlements  | 0.20 |
| 03/16/18 | AGL | Work on motion to approve Sunwind deal; review terms of APA and ancillary documents; conference with C. Bennett re: revisions                       | 3.50 |
| 03/16/18 | CRB | Review Sunwind Agreement and Motion; conference with A. Lizotte to review suggested changes   | 0.60 |
| 03/19/18 | AGL | Revisions to Sunwind Settlement documents; review APA; conference with H. Murphy, C. Bennett re: same; Memo to trustee                              | 3.50 |
| 03/19/18 | CRB | Sunwind sale - conference with A. Lizotte regarding issues and revisions to Agreement   | 0.30 |
| 03/19/18 | HBM | Review revisions re: net winner in SEC litigation; conference with A. Lizotte re: same  | 0.40 |
| 03/19/18 | HBM | Conference with A. Lizotte re: Sunwind issues   | 0.40 |
| 03/20/18 | AGL | Memo to Tom Kueler re: follow up on Sunwind P&S issues  | 0.20 |
| 03/20/18 | AGL | Emails with S. Kelly, Trustee, SEC re: Crosby VIN information   | 0.30 |
| 03/20/18 | AGL | Review final edits to Crosby settlement papers from S. Kelly; telephone conference and memo to SEC, Trustee   | 1.20 |

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|          |     | re: same; work on revisions, aligning motion and agreement  |      |
| 03/21/18 | AGL | Review Sunwind brokerage agreements; telephone conference with Tom Kueller re: same; work on revisions to deal exhibits | 1.30 |
| 03/26/18 | AGL | Review buyer's revisions to Sunwind documents; draft email response re: same; work on revisions to settlement motion    | 2.20 |
| 03/26/18 | CRB | Edits to the Sunwind sale   | 0.40 |
| 03/27/18 | AGL | Final review/revisions to Sunwind exhibits; conference with C. Bennett re: same; email to buyer                         | 0.80 |
| 03/28/18 | AGL | Telephone conference with T. Kueller re: Exhibit A to Sunwind motion; final review of Sunwind motion, exhibits and file | 0.80 |
| 03/29/18 | AGL | Emails and telephone conferences with Court, Sunwind re: motion filing, notices issues                                  | 0.40 |
| 03/30/18 | AGL | Review net winnings data, manual credit defendants in 4032 insider actions  | 1.00 |

| <u>Attorney</u>         | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>      |
|-------------------------|--------------|-------------|--------------------|
| ANDREA N. MAZZARELLA    | 2.40         | 220.00      | 528.00             |
| ANDREW G. LIZOTTE       | 58.90        | 595.00      | 35,045.50          |
| ANDREW G. LIZOTTE       | 37.80        | 615.00      | 23,247.00          |
| CHARLES R. BENNETT, JR. | 4.30         | 625.00      | 2,687.50           |
| CHRISTINE E. WILKINS    | 13.50        | 220.00      | 2,970.00           |
| CHRISTINE E. WILKINS    | 2.60         | 225.00      | 585.00             |
| HAROLD B. MURPHY        | 4.60         | 625.00      | 2,875.00           |
| JONATHAN F.X. O'BRIEN   | 1.40         | 475.00      | 665.00             |
| MICHAEL K. O'NEIL       | 11.90        | 345.00      | 4,105.50           |
| <b>Total Fees</b>       |              |             | <b>\$72,708.50</b> |

EXHIBIT G

SERVICES RELATING TO COMMUNICATIONS WITH CREDITORS AND  
GOVERNMENTAL AGENCIES

| <u>Date</u> | <u>Atty</u> | <u>Description</u>  | <u>Hours</u> |
|-------------|-------------|---|--------------|
| 03/03/17    | AGL         | Review Huron updated damages report for sentencing hearing  | 0.80         |
| 03/09/17    | AGL         | Review article on new indictments - Casula  | 0.30         |
| 03/16/17    | AGL         | Review government criminal trial memorandum, Nehra services   | 0.40         |
| 03/17/17    | AGL         | Telephone conference with trustee re: sentencing hearing; review article re: same   | 0.30         |
| 03/20/17    | AGL         | Telephone conference with T. Martin re: sentencing hearing, forfeiture  | 0.20         |
| 03/21/17    | HBM         | Telephone call with trustee re: sentencing hearing, forfeiture issues and status  | 0.30         |
| 03/22/17    | AGL         | Review USA sentencing memorandum; prepare for and attend Merrill sentencing hearing   | 6.00         |
| 03/22/17    | HBM         | Conference with A. Lizotte re: settlement hearing; review government's sentencing memorandum; email to trustee re: same                                     | 1.20         |
| 03/23/17    | AGL         | Emails from trustee re: sentencing hearing  | 0.20         |
| 03/29/17    | AGL         | Conference with H. Murphy re: forfeiture issues   | 0.20         |
| 03/31/17    | AGL         | Conference with DOJ, Tim Martin re: portal issues   | 0.20         |
| 04/03/17    | HBM         | Emails to US Attorney re: forfeiture; brief telephone call with trustee re: same  | 0.40         |
| 04/05/17    | AGL         | Prepare for and attend telephone conferences with M. Murrane, Trustee re: forfeiture issues   | 0.70         |
| 04/05/17    | HBM         | Telephone call with M. Murrane re: forfeiture issues, status and structure; telephone call with trustee re: same; brief conference with A. Lizotte re: same | 0.80         |
| 04/20/17    | MKO         | Review SEC and DOJ filing; email to Grove re: same  | 0.20         |
| 05/16/17    | AGL         | Review criminal docket; forfeiture order, PIEC response; conference with H. Murphy re: same; review US forfeiture website                                   | 1.00         |
| 05/17/17    | AGL         | Draft letter to US Attorney re: interest in forfeited assets  | 0.60         |
| 05/18/17    | AGL         | Telephone conference with M. Murrane re: forfeiture schedule; revise letter to Murrane; conference with H.  | 0.50         |

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|          |     | Murphy re: same  |      |
| 05/18/17 | HBM | Review and revise letter to US Attorney re: forfeiture and tolling; telephone call with Department of Justice re: tax issues; email to client re: same   | 1.00 |
| 05/22/17 | AGL | Telephone conference to Mary Murrane re: forfeiture issues; telephone conference with S. Darr re: same; revise letter to USA re: tolling forfeiture deadline                                   | 1.00 |
| 05/22/17 | HBM | Telephone call with trustee; telephone call with M. Murrane; conference with A. Lizotte re: status hearing issues re: forfeiture; 2nd telephone call with trustee re: same                     | 1.50 |
| 05/23/17 | AGL | Assemble background information for restitution order; email to M. Murrane; conference with H. Murphy; review proposed restitution order; work on revisions; telephone conference with trustee | 3.00 |
| 05/23/17 | HBM | Emails re: tomorrow's hearing  | 0.20 |
| 05/23/17 | HBM | Review and revise memo to US Attorney re: order; conference with A. Lizotte re: same   | 0.50 |
| 05/24/17 | AGL | Emails with US re: forfeiture order  | 0.10 |
| 05/25/17 | MKO | Review US v. Merrill docket; notice of restitution order filed in same; confer with H. Murphy and A. Lizotte re: same  | 0.80 |
| 05/25/17 | MKO | Review rules and statutes re: challenges to restitution orders, ancillary proceedings  | 2.10 |
| 05/30/17 | AGL | Review updates on DOJ website re: forfeitures, emails re: same   | 0.30 |
| 06/01/17 | AGL | Email re: SEC intention to lift stay in administrative action; telephone conference to D. Bernstein  | 0.20 |
| 06/06/17 | AGL | Emails with D. Bernstein re: status of SEC action  | 0.20 |
| 06/08/17 | AGL | Review PIEC responses to proposed restitution order; conference with H. Murphy re: same  | 0.50 |
| 06/26/17 | CMC | Review/revise Massachusetts SOS filing   | 0.70 |
| 06/26/17 | HBM | Telephone call with Andrew Lelling re: case status and Singapore funds; email re: same   | 0.50 |
| 07/11/17 | AGL | Review restitution order entered in District Court; draft notice re: same  | 0.40 |
| 07/14/17 | AGL | Work on notice of entry of restitution order   | 1.00 |
| 07/17/17 | HBM | Work on motion re: forfeiture action; conference with A. Lizotte re: same  | 0.80 |
| 07/19/17 | AGL | Memo to trustee re: results of DOJ conference call; conference with H. Murphy re: same   | 0.80 |
| 07/21/17 | AGL | Review SEC judgment against Merrill  | 0.30 |
| 08/14/17 | AGL | Analysis of restitution, forfeiture documents  | 0.50 |
| 08/18/17 | AGL | Review criminal docket, forfeiture, resolution pleadings; draft revisions to status report   | 4.00 |
| 08/22/17 | AGL | Work on restitution report   | 0.80 |

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| 08/24/17 | AGL | Revise status report on forfeiture; review criminal docket, notices; research claims against Fabio Wanzeler, status of 4032 action, service; conference with H. Murphy, C. Bennett re: same    | 1.70 |
| 08/25/17 | AGL | Work on memo to US Attorney re: Fabio Wanzeler litigation, claims, forfeiture issues   | 1.00 |
| 08/28/17 | AGL | Additional work on memo re: Fabio Wanzeler net winnings, forfeiture; review Huron Analysis   | 2.00 |
| 08/29/17 | AGL | Conference with H. Murphy re: Fabio Wanzeler - forfeiture issues; email to Mary Murrane  | 0.30 |
| 08/29/17 | HBM | Review memo from A. Lizotte re: forfeiture action status, issues and claims re: F. Wanzeler; email to M. Murrane re: same; review and revise memo to PIEC; conference with A. Lizotte re: same | 1.20 |
| 09/05/17 | HBM | Review and response to email from KPMG; email to M. Murrane; telephone call with M. Murrane re: same; telephone call with trustee  | 0.70 |
| 09/05/17 | MKO | Review Department of Justice status report; email to A. Lizotte and H. Murphy re: same   | 0.20 |
| 09/06/17 | HBM | Prepare for telephone call with USA; telephone call with M. Murrane re: same; conference with A. Lizotte re: forfeiture issues   | 0.80 |
| 09/11/17 | HBM | Telephone call with Trustee re: (1) forfeiture action, issues and status (2) IRS response and issues   | 0.30 |
| 09/12/17 | AGL | Review SEC motion to amend complaint   | 0.10 |
| 10/18/17 | HBM | Emails to US Attorney re: forfeiture, claims and case status; brief conference with A. Lizotte re: same  | 0.40 |
| 10/20/17 | AGL | Review memo on prosecution of money launderer  | 0.10 |
| 10/26/17 | AGL | Telephone conference with C. Bennett re: response to pending SEC action  | 0.20 |
| 10/27/17 | AGL | Telephone conference with D. Bernstein re: SEC litigation, consent order   | 0.30 |
| 10/30/17 | HBM | Telephone call with S. Darr re: variety of issues, IRS, forfeiture and claims; conference with A. Lizotte re: same   | 0.40 |
| 11/30/17 | AGL | Review responses to USA forfeiture claims  | 0.30 |
| 12/04/17 | AGL | Email from Trustee re: forfeiture funds  | 0.20 |
| 12/12/17 | HBM | Telephone call with T. Martin re: SEC issues   | 0.20 |
| 01/02/18 | CMC | Draft status report in MA SEC action; conference with P. Costello re: same   | 0.60 |
| 01/08/18 | CMC | Prepare status report in MA SEC action; emails with P. Costello regarding same   | 1.10 |
| 02/13/18 | AGL | Telephone conference with Matt Douglas (MSD) re: 2004 exam; review CIAO documents and produce  | 0.30 |
| 02/14/18 | MKO | Review Mass SEC request for Ciao Telecom document and 2004 motion and order re: same; memo to Mass   | 0.50 |

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| 02/21/18 | AGL | SEC re: same<br>Telephone conference with Trustee re: Carlos Wanzeler<br>citizenship, prosecution issues | 0.20 |
| 02/22/18 | AGL | Review recent article on Wanzeler extradition;<br>telephone conference with trustee re: same             | 0.20 |

| <u>Attorney</u>       | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>      |
|-----------------------|--------------|-------------|--------------------|
| ANDREW G. LIZOTTE     | 30.70        | 595.00      | 18,266.50          |
| ANDREW G. LIZOTTE     | 0.70         | 615.00      | 430.50             |
| CHRISTOPHER M. CONDON | 0.70         | 485.00      | 339.50             |
| CHRISTOPHER M. CONDON | 1.70         | 500.00      | 850.00             |
| HAROLD B. MURPHY      | 11.20        | 625.00      | 7,000.00           |
| MICHAEL K. O'NEIL     | 3.30         | 345.00      | 1,138.50           |
| MICHAEL K. O'NEIL     | 0.50         | 360.00      | 180.00             |
| <b>Total Fees</b>     |              |             | <b>\$28,205.00</b> |



EXHIBIT H

SERVICES RELATING TO CASE ADMINISTRATION

| <u>Date</u> | <u>Atty</u> | <u>Description</u>  | <u>Hours</u> |
|-------------|-------------|---|--------------|
| 03/07/17    | AGL         | Conference with D. McCormack, C. Bennett re: backup for Ympactus write off, IRS inquiries; search for documents       | 1.20         |
| 03/07/17    | HBM         | Telephone conference with S. Darr re: case issues   | 0.20         |
| 03/08/17    | AGL         | Review draft February MOR's   | 0.30         |
| 03/13/17    | HBM         | Conference with A. Lizotte re: issues and request for tax information; email re: same                                 | 0.20         |
| 03/14/17    | HBM         | Emails re: tax issues, etc.   | 0.20         |
| 03/15/17    | HBM         | Email re: tax issues and request; brief conference with A. Lizotte re: same   | 0.40         |
| 03/17/17    | HBM         | Emails re: case status  | 0.20         |
| 03/20/17    | AGL         | Emails with conference with KPMG on taxes   | 0.20         |
| 03/21/17    | HBM         | Telephone call from creditor re: case status  | 0.20         |
| 03/23/17    | AGL         | Prepare for and attend conference with KPMG re: taxes   | 0.60         |
| 03/23/17    | HBM         | Conference with A. Lizotte re: tax issues; email re: same   | 0.30         |
| 03/24/17    | AGL         | Review draft letter to IRS re: refund challenge   | 0.20         |
| 03/27/17    | AGL         | Conference with C. Bennett, Trustee, KPMG re: IRS letter, PIEC tax requests; search for tax documents                 | 1.30         |
| 03/27/17    | AGL         | Legal research re: impact of erroneous refund   | 1.50         |
| 03/27/17    | CRB         | Conference with A. Lizotte regarding open issues, including tax refund, PIEC request for information, and late claims | 0.40         |
| 03/27/17    | HBM         | Review latest issues and position to IRS re: taxes; conference with A. Lizotte; email re: same                        | 0.60         |
| 03/27/17    | JFO         | Discuss Florida deeds with A. Lizotte; resend drafts  | 0.30         |
| 03/28/17    | AGL         | Conference with D. McCormack re: tax returns; email to PIEC re: same  | 0.30         |
| 03/28/17    | MKO         | Confer with A. Lizotte re: IRS tax refund claim; begin review case law re: same                                       | 0.80         |
| 03/29/17    | MKO         | Continue review of case law re: erroneous refund of IRS   | 3.10         |
| 03/30/17    | MKO         | Continue research re: IRS's erroneous return; begin draft memo re: same   | 4.20         |
| 03/31/17    | MKO         | Continue draft memo re: erroneous returns; additional research re: same   | 3.10         |
| 04/03/17    | MKO         | Final review and revision of memo re: case law; confer with A. Lizotte re: same                                       | 0.90         |

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| 04/05/17 | AGL | Telephone conference with trustee re: fee/expense issues   | 0.20 |
| 04/20/17 | HBM | Review status report; email re: same   | 0.40 |
| 05/01/17 | AGL | Review and consider IRS memo on bad debt deduction   | 0.40 |
| 05/09/17 | HBM | Conference with S. Darr and T. Martin re: tax issues and meeting to discuss claims issues  | 0.60 |
| 05/11/17 | HBM | Meeting with trustee and Huron re: (1) IRS issues; (2) claims issues   | 2.30 |
| 05/12/17 | AGL | Telephone conference with trustee re: 5/18 meeting   | 0.20 |
| 05/16/17 | AGL | Telephone conference with KPMG re: strategy with DOJ on disputed refund; review KPMG memo on tax issues  | 1.20 |
| 05/16/17 | AGL | Review letter from IRS re: demand for return of refund; conference with H. Murphy re: same; review cases   | 2.50 |
| 05/16/17 | CRB | Conference with H. Murphy re: IRS and refund   | 0.30 |
| 05/16/17 | HBM | Prepare for participate in telephone call with KPMG and trustee re: IRS letter, issues and strategy  | 1.00 |
| 05/16/17 | HBM | Review letter form IRS re: refund; conference with A. Lizotte; email re: same; review cases re: same; conference with M. O'Neil re: same                   | 2.30 |
| 05/16/17 | MKO | Review materials from prior research; begin analyses of additional case law re: 507(c) and IRS refund claim; confer with H. Murphy and A. Lizotte re: same | 2.50 |
| 05/17/17 | MKO | Review and revise memo re: 507(c) and tax refunds  | 1.70 |
| 05/17/17 | MKO | Continue review of case law re: 507(c) and tax refunds   | 4.30 |
| 05/18/17 | AGL | Further review of legal issues with IRS re: refund; telephone conference with C. Moore re: same; email to trustee re: same                                 | 2.50 |
| 05/18/17 | HBM | Telephone call from attorney for defendant re: case status   | 0.30 |
| 05/18/17 | MKO | Review and revise memo re: 507(c) and tax refund   | 1.20 |
| 05/18/17 | MKO | Review KPMG memo re: IRS tax issues; review case law cited therein   | 2.30 |
| 05/19/17 | AGL | Emails with DOJ, Trustee re: 6/1 conference call   | 0.20 |
| 05/22/17 | AGL | Email to KPMG compiling cases on erroneous refunds   | 0.40 |
| 05/30/17 | AGL | Conference with H. Murphy, KPMG, Trustee re: tax meeting   | 0.30 |
| 05/31/17 | AGL | Prepare for tax refund call, review memos, IRS letter  | 1.00 |
| 05/31/17 | HBM | Review comment upon proposed response to IRS re: disallowance of refund and returns; emails re: same; brief conference with A. Lizotte re: same            | 1.50 |
| 05/31/17 | MKO | Research case law re: IRS refund claim and possible statute of limitations   | 2.00 |
| 06/01/17 | AGL | Research 505 tax provisions, Internal Revenue Code requirements for refund claim   | 0.80 |
| 06/01/17 | AGL | Follow up letters to DOJ, SEC re: tax dispute, impact on case  | 1.50 |

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| 06/01/17 | AGL | Prepare for/attend calls with KPMG, DOJ re: tax disputes  | 3.50 |
| 06/01/17 | CRB | Conference regarding IRS claim and disputed refund  | 0.40 |
| 06/01/17 | CRB | Review file to consider the position taken re: revenue and expenses in prior pleading in light of the tax issues  | 1.20 |
| 06/01/17 | CRB | Review the IRS NOPA and the KPMG proposed response  | 1.60 |
| 06/01/17 | HBM | Prepare for and attend telephone call with KPMG and trustee re: preparation for today's call with IRS   | 1.00 |
| 06/01/17 | HBM | Participate in telephone call with IRS and DOJ re: tax issues; emails re: same; several conferences with trustee re: same   | 2.50 |
| 06/01/17 | MKO | Continue of case law re: possible statute of limitations on 505 - determination of IRS claim and refund   | 1.00 |
| 06/02/17 | AGL | Lengthy telephone conference with SEC re: IRS tax dispute; conference with H. Murphy re: same; email to trustee re: same  | 1.00 |
| 06/02/17 | HBM | Conference with A. Lizotte re: discussions with SEC and US Attorney; email to KPMG  | 0.40 |
| 06/05/17 | AGL | Telephone conference with Trustee re: insurance of Florida properties   | 0.20 |
| 06/06/17 | JFO | Email correspondence with Florida attorney regarding issues with recording deed in current form   | 0.50 |
| 06/07/17 | AGL | Telephone conference with SEC re: ongoing issues in SEC Administrative suit, discussions with DOJ re: tax refund, conference with C. Bennett re: same; memo to trustee, KPMG re: same,; review DOJ directive on Ponzi cases | 1.50 |
| 06/07/17 | HBM | Review memo from KPMG re: tax issues and strategy re: IRS; brief conference with A. Lizotte re: same  | 0.50 |
| 06/08/17 | AGL | Telephone conference from T. Martin re: case status   | 0.20 |
| 06/08/17 | AGL | Review KPMG updated tax memo re: NOPA's refunds   | 1.00 |
| 06/08/17 | JFO | Discussion with Polk County title company regarding Bankruptcy Certificate to help identify seller authority; obtain certified copies   | 0.50 |
| 06/08/17 | MXC | Travel to Bankruptcy Court re: certifying documents   | 0.40 |
| 06/09/17 | AGL | Review IRS letter on refund, request for information; email to KPMG re: same  | 0.50 |
| 06/09/17 | HBM | Work on issues related to taxes; emails re: same  | 1.50 |
| 06/12/17 | AGL | Review May monthly operating reports  | 0.20 |
| 06/12/17 | AGL | Analysis of tax memo from KPMG and DOJ; email to KPMG re: same  | 1.00 |
| 06/12/17 | HBM | Emails re: Singapore Act  | 0.30 |
| 06/12/17 | HBM | Further review of IRS response; review email to KPMG and trustee re: reply; brief conference with A. Lizotte re: same; telephone call with M. Murrane   | 1.00 |

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| 06/12/17 | JFO | Follow up regarding filing of deeds; email correspondence to Florida recording attorney   | 0.40 |
| 06/13/17 | AGL | Review emails re: insurance on Florida property   | 0.20 |
| 06/13/17 | AGL | Conduct legal research of 507(c), competing arguments on erroneous tax refund   | 2.00 |
| 06/13/17 | JFO | Email correspondence with Palm Beach recording attorney; discuss title issues with recording  | 1.00 |
| 06/15/17 | AGL | Email from trustee re: Sanderley bank funds   | 0.10 |
| 06/16/17 | AGL | Emails with Palm Beach re: property sale status; emails with SEC, J. O'Brien re: title search, deed recordation                       | 0.40 |
| 06/16/17 | JFO | Correspondence with Palm Beach recording attorney and Polk County recording attorney; email regarding deeds recorded                  | 1.00 |
| 06/19/17 | AGL | Emails with J. O'Brien, D. Bernstein re: title on Florida properties  | 0.20 |
| 06/19/17 | AGL | Review KPMG compromise letter and response to NOPA's  | 0.50 |
| 06/19/17 | AGL | Legal research re: treatment of erroneous tax refund; draft response letter to IRS  | 6.00 |
| 06/19/17 | HBM | Work on letter to IRS   | 0.80 |
| 06/20/17 | AGL | Conference with H. Murphy re: comments on KPMG tax letters, revisions to Trustee tax letter; work on revisions to letters             | 4.00 |
| 06/20/17 | HBM | Review latest draft of KPMG letter to IRS; outline of Trustee's letter; conference with A. Lizotte re: same                           | 1.20 |
| 06/20/17 | HBM | Further work on IRS letter; conference with A. Lizotte re: revisions  | 1.20 |
| 06/21/17 | AGL | Reconcile collections in Sanderley settlement ; email to D. Bernstein re: same  | 0.30 |
| 06/22/17 | AGL | Work on tax letter to IRS; legal research re: defenses to claim; conference with H. Murphy re: same                                   | 4.20 |
| 06/22/17 | HBM | Revise memo re: IRS claims; conference with A. Lizotte re: same   | 0.80 |
| 06/23/17 | AGL | Additional research of priority of tax claims, 507(c), 502(i); memo to H. Murphy re: same   | 4.00 |
| 06/24/17 | HBM | Work on memo re: taxes; review and revise latest draft; review cases re: IRS claim; conference with A. Lizotte re: same               | 1.80 |
| 06/26/17 | AGL | Conference with H. Murphy, Trustee re: tax response letters; meeting; telephone conference with trustee re: supplemental returns      | 0.40 |
| 06/26/17 | HBM | Telephone call with M. Murrane re: Singapore funds  | 0.30 |
| 06/26/17 | HBM | Email to M. Murrane re: Singapore assets; brief conference with A. Lizotte re: same and additional issues re: KPMG and letters to IRS | 0.50 |
| 06/28/17 | AGL | Prepare for and attend KPMG conference call re: IRS   | 1.50 |

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|          |     | tax dispute, letters; revise letters and send  |      |
| 06/28/17 | HBM | Prepare for and participate in telephone call with Trustee and KPMG re: IRS issues, claims and letter  | 0.50 |
| 07/06/17 | ANM | Conference with J. O'Brien re: update property searches for 5600 North Flagler Ave, Apt. 307, W. Palm Beach and 124 Woodmoor Court, Davenport, FL; research Polk County and Palm Beach County Registry of Deeds online records and obtain recently recorded deeds; revise property summary to reflect new deeds; brief follow-up conference with J. O'Brien re: findings | 1.00 |
| 07/10/17 | AGL | Review IRS notice on 2013 tax return   | 0.20 |
| 07/10/17 | AGL | Telephone conference with KPMG re: tax issues  | 0.20 |
| 07/10/17 | HBM | Review issues re: IRS latest motion and emails re: same  | 0.50 |
| 07/11/17 | AGL | Telephone conference with trustee re: retention of Florida broker  | 0.10 |
| 07/11/17 | AGL | Review June Operating reports  | 0.20 |
| 07/17/17 | AGL | Telephone conference with trustee re: Sanderley account reconciliation; review chart re: same  | 0.30 |
| 07/18/17 | AGL | Review memo/spreadsheet re: Singapore claims; telephone conference with Tim Martin re: same  | 0.60 |
| 07/19/17 | AGL | Review and discuss tax issues; prepare for and attend conference call with C. Moore re: tax dispute  | 1.40 |
| 07/19/17 | HBM | Conference A. Lizotte re: tax issues; email to C. Moore  | 0.40 |
| 07/19/17 | HBM | Prepare for and participate in telephone call with US Attorney re: tax claim and potential resolution; conference with A. Lizotte re: same   | 1.30 |
| 07/20/17 | HBM | Email to trustee re: case status and issues re: IRS  | 0.30 |
| 07/20/17 | HBM | Review information re: VOIP sales for IRS requested analysis and email re: same  | 0.40 |
| 07/20/17 | HBM | Telephone call with trustee re: issues, status and strategy re: IRS and preparation of analysis requested by IRS   | 0.40 |
| 07/21/17 | AGL | Review listing agreement for Woodmoor; email to trustee re: same   | 0.50 |
| 07/21/17 | AGL | Review Huron VOIP sale analysis; conference with H. Murphy re: same, taxes   | 0.50 |
| 07/21/17 | HBM | Prepare for and participate in call with trustee and accountants re: IRS requested analysis, response and review latest revenue analysis; conference with trustee re: same   | 1.50 |
| 07/24/17 | AGL | Analysis of KPMG pro forma P&L based only on VOIP activity and related email   | 0.50 |
| 07/25/17 | AGL | Conference with H. Murphy re: VOIP pro forma income statement; email to KPMG re: same  | 0.50 |
| 07/25/17 | HBM | Review issues re: VOIP income and expense for 2012 - 2014; email to trustee and KPMG re: same  | 1.30 |

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| 07/26/17 | HBM | Emails re: tax issues; review latest from KPMG;<br>conference with A. Lizotte re: letter to C. Moore   | 1.00 |
| 07/27/17 | AGL | Draft settlement letter to IRS   | 0.50 |
| 07/28/17 | AGL | Review offer letter for Woodmoor; telephone<br>conference with trustee re: same; email re: same  | 0.40 |
| 07/31/17 | AGL | Revise letter to DOJ re: VOIP based tax return;<br>conference with H. Murphy re: same  | 0.40 |
| 07/31/17 | HBM | Review and revise letter to IRS; conference with A.<br>Lizotte re: same; email to trustee  | 0.80 |
| 08/01/17 | AGL | Review DOJ follow up questions on 2013 taxes;<br>conference with H. Murphy; email to Huron re: same  | 0.30 |
| 08/01/17 | HBM | Review response and email from US attorney re: IRS<br>claim; conference with A. Lizotte re: response   | 0.40 |
| 08/02/17 | AGL | Email from KPMG re: costs of goods sold for VOIP   | 0.20 |
| 08/03/17 | AGL | Review/revise proposed listing agreement for Flagler<br>Drive; memo to trustee re: same  | 0.60 |
| 08/03/17 | AGL | Review emails re: cost of sales for VOIP revenue; draft<br>followup letter to DOJ explaining same  | 0.70 |
| 08/03/17 | HBM | Conference with A. Lizotte re: trustee's issues with IRS<br>analysis; telephone call with trustee re: same   | 0.40 |
| 08/07/17 | AGL | Prepare for/attend conference call with DOJ re: tax<br>disputes; draft memo to trustee, KPMG re: same  | 0.80 |
| 08/07/17 | HBM | Conference with A. Lizotte before and after call with<br>US Attorney re: IRS claim; email re: same   | 0.80 |
| 08/08/17 | AGL | Emails, telephone conferences with KPMG, Trustee re:<br>KPMG fees, IRS tax dispute; conferences with H.<br>Murphy, C. Bennett re: options to resolve tax claims              | 1.50 |
| 08/08/17 | CRB | Address structuring of the IRS claim and payment   | 1.60 |
| 08/08/17 | HBM | Emails re: IRS; conference with C. Bennett re: issues re:<br>potential settlement and subordination; conference with<br>A. Lizotte re: tax claims; review analysis of claims | 1.80 |
| 08/09/17 | HBM | work on issues re: IRS claim, subordination and related<br>issues  | 1.00 |
| 08/10/17 | AGL | Review July MOR's  | 0.20 |
| 08/10/17 | AGL | Prepare for and attend conference call with KPMG re:<br>IRS tax dispute  | 0.80 |
| 08/10/17 | AGL | Work on application to employ broker - Flagler, and<br>affidavit; telephone conference with trustee re: same   | 2.00 |
| 08/10/17 | HBM | Prepare for and participate in telephone call with KPMG<br>re: IRS, issues, strategy and emails with IRS   | 1.20 |
| 08/11/17 | AGL | Emails with DOJ, KPMG re: 2014 tax returns   | 0.20 |
| 08/14/17 | AGL | Review tax redemption notice - Florida   | 0.10 |
| 08/14/17 | AGL | Review draft Davenport listing agreement; draft<br>proposed revisions  | 0.50 |
| 08/14/17 | AGL | Telephone conference with trustee re: Flagler broker;<br>telephone conference with broker re: listing agreement;   | 0.80 |



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|          |     | review revisions; draft declaration  |      |
| 08/15/17 | AGL | Finalize and file Flagler broker retention pleadings   | 0.70 |
| 08/15/17 | AGL | Telephone conferences with Polk County re: Davenport tax sale, draft letter re: estate asset, stay violation   | 1.20 |
| 08/16/17 | AGL | Email from court re: deficiency notice; memo to broker re: same  | 0.20 |
| 08/16/17 | HBM | Emails re: case status; brief conference with A. Lizotte re: same  | 0.30 |
| 08/18/17 | AGL | Review C. Moore memo re: status of tax dispute   | 0.30 |
| 08/22/17 | AGL | Conference with A. Mazzarella re: Florida Wanzeler properties  | 0.30 |
| 08/22/17 | AGL | Review letter from potential buyer - Woodmore; email from Flagler broker re: corrected affidavits; telephone conference with Davenport tax collector re: case, sale issues               | 0.70 |
| 08/22/17 | CRB | Conference regarding tax issues and responsive and restrictive orders  | 0.50 |
| 08/22/17 | HBM | Conference with trustee (1) IRS (2) forfeiture (3) class action, issues and status   | 0.50 |
| 08/24/17 | AGL | Email to T. Martin re: VOIP sale analysis sent to DOJ  | 0.10 |
| 08/24/17 | AGL | Emails with DOJ re: 8/30 tax meeting, document request   | 0.20 |
| 08/24/17 | AGL | Telephone conference with D. Bernstein re: status of reconciling Sanderley bank accounts; review Trustee analysis  | 0.30 |
| 08/24/17 | AGL | Prepare for and attend conference with KPMG re: IRS negotiations   | 0.60 |
| 08/24/17 | HBM | Meeting with trustee and KPMG re: IRS issues and requests; conference with Huron and Trustee re: (1) class action (2) claims process (3) forfeiture; conference with A. Lizotte re: same | 2.30 |
| 08/25/17 | AGL | Emails re: landscaping, Davenport listing  | 0.20 |
| 08/25/17 | AGL | Review Davenport violation notice, proposed listing agreement; email to Trustee re: status of property   | 0.30 |
| 08/28/17 | AGL | Emails with Q. Agersto re: case status   | 0.20 |
| 08/29/17 | AGL | Work on application to employment Davenport broker; review listing agreement revisions; draft affidavit  | 1.00 |
| 08/30/17 | AGL | Receive/review Davenport brokerage documents; finalize pleadings and file  | 0.50 |
| 08/31/17 | HBM | Telephone call from attorney for creditor re: case status  | 0.20 |
| 09/05/17 | AGL | Emails with KPMG re: IRS document requests   | 0.20 |
| 09/06/17 | AGB | Draft e-mail to KPMG, M&K circulating District Court opinion in re DSBI  | 0.10 |
| 09/06/17 | AGB | Retrieve and review district court decision and pleadings re: good faith/value defense to UFTA action in Ponzi scheme case per request of H. Murphy                                      | 0.90 |



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| 09/06/17 | HBM | Review DBSI decision re: tax claim and IRS; emails to T. Greenway; conference with A. Brier re: same; review district court decision re: same         | 1.20 |
| 09/07/17 | AGL | Review latest decisions on claims against IRS   | 0.50 |
| 09/11/17 | AGL | Telephone conference with Trustee re: status of Florida properties  | 0.20 |
| 09/12/17 | AGL | Review order to employ K. Fatta as broker; emails re: same  | 0.20 |
| 09/13/17 | AGL | Review August operating reports   | 0.30 |
| 09/14/17 | AGL | Review order employing Moecker; email to trustee, broker re: same   | 0.20 |
| 09/15/17 | HBM | Prepare for meeting with trustee and Huron re: open case issues   | 0.50 |
| 09/18/17 | AGL | Review tax documentation, letters, from IRS and State of California   | 0.20 |
| 09/18/17 | HBM | Review latest IRS notice and email re: same   | 0.20 |
| 09/19/17 | AGL | Telephone conference from Trustee re: meeting with IRS  | 0.10 |
| 09/19/17 | AGL | Review KPMG letters re: penalty abatements  | 0.20 |
| 09/19/17 | AGL | Review email re: Florida tax notice; retrieve Davenport documents and forward to Trustee  | 0.40 |
| 09/19/17 | HBM | Telephone call with S. Darr re: latest with IRS   | 0.20 |
| 09/22/17 | AGL | Conference with C. Bennett re: tax refund issues  | 0.20 |
| 09/25/17 | AGL | Review recent tax decisions re: refunds, avoidance rights   | 0.50 |
| 09/26/17 | HBM | Emails re: tax issues and Florida refund; brief conference with A. Lizotte re: same   | 0.30 |
| 09/28/17 | HBM | Telephone call from creditor re: case status  | 0.20 |
| 09/29/17 | AGL | Review notice from Polk County clerk re: Woodmoor   | 0.20 |
| 10/02/17 | AGL | Telephone conference with Deena Bernstein re: Sanderley bank account/tax dispute  | 0.30 |
| 10/02/17 | HBM | Telephone call from creditor re: case status  | 0.20 |
| 10/06/17 | HBM | Telephone call with trustee re: case status   | 0.20 |
| 10/09/17 | AGL | Emails with broker re: sale of Flagler Drive  | 0.20 |
| 10/10/17 | AGL | Review offer documents for Flagler Drive; telephone conference with trustee re: same  | 0.50 |
| 10/11/17 | AGL | Review IRS determination letters; postpetition returns  | 0.20 |
| 10/11/17 | AGL | Emails with broker re: Flagler drive negotiations; work on P&S agreement; conference with J. O'Brien, Trustee   | 1.00 |
| 10/11/17 | JFO | Conference with title expert regarding authority to execute documents pursuant to bankruptcy order and Florida law requirements; email correspondence | 2.00 |
| 10/11/17 | JFO | Review and revise Purchase and Sale and conference with A. Lizotte; review deed requirements under Florida law  | 3.50 |
| 10/12/17 | AGL | Conference with J. O'Brien, broker re: Flagler sale   | 0.40 |

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|          |     | issues  |      |
| 10/18/17 | AGL | Memo to trustee re: IRS, settlements  | 0.40 |
| 10/18/17 | HBM | Email re: SEC, IRS and Wells; conference with A. Lizotte re: same   | 0.40 |
| 10/20/17 | AGL | Work on motion/notice sale pleadings for Flagler Drive; draft rider to P&S; telephone conference with emails with trustee, broker re: deal status   | 2.00 |
| 10/20/17 | HBM | Telephone call from creditor re: case status; email re: same  | 0.30 |
| 10/23/17 | HBM | Email to trustee re: case status and issues   | 0.30 |
| 10/24/17 | AGL | Telephone conference with trustee re: Flagler Drive property; email from Kim Fatta re: same   | 0.20 |
| 10/25/17 | AGL | Email to trustee re: IRS negotiations   | 0.10 |
| 10/26/17 | AGL | Conference with H. Murphy re: status of tax negotiations  | 0.30 |
| 10/26/17 | HBM | Work on issues re: IRS; conference with A. Lizotte re: same; email to trustee re: same  | 0.80 |
| 10/27/17 | AGL | Review new offer on Flagler; email to broker, trustee re: same  | 0.60 |
| 10/27/17 | HBM | Telephone call with T. Greenway re: IRS issues; brief conference with A. Lizotte re: same   | 0.30 |
| 10/30/17 | AGL | Review liens, dues on Flagler property; legal research re: same; conference with J. O'Brien re: same; telephone conference with trustee re: sale status; work on revisions to purchase and sale; telephone conference with broker | 2.30 |
| 10/31/17 | AGL | Review Polk County tax bill   | 0.10 |
| 11/01/17 | AGL | Emails with broker re: Flagler Drive status; telephone conference with trustee re: same   | 0.30 |
| 11/01/17 | AGL | Telephone conference with J. Craft re: Sunwind deal comments  | 0.30 |
| 11/01/17 | AGL | Review notices of deficiency from IRS and emails re: same; research dispute resolution options, tax jurisdiction issues; conference with H. Murphy re: same   | 3.00 |
| 11/01/17 | HBM | Review IRS notices; multiple emails re: same with trustee and T. Greenway; telephone call with S. Darr; review research re: same; conference with A. Lizotte re: same   | 1.80 |
| 11/01/17 | MKO | Research case law re: Bankruptcy Court Jurisdiction over tax dispute; draft memo re: same   | 2.50 |
| 11/02/17 | AGL | Emails re: Flagler purchase and sale, contingencies; revise sale motion and notice; telephone conference with homeowner association re: charges   | 0.80 |
| 11/02/17 | AGL | Conference with D. Lyne, H. Murphy re: potential tax litigations; prepare for and attend call with KPMG re: same; emails with Department of Justice re: same  | 1.60 |
| 11/02/17 | AGL | Additional legal research on 505, tax jurisdiction issues;  | 3.50 |

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|          |     | draft memorandum re: same  |      |
| 11/02/17 | CRB | Conference regarding IRS; and follow up with A. Lizotte re: background research memo   | 0.60 |
| 11/02/17 | DJL | Conference with H. Murphy, A. Lizotte and C. Bennett re: IRS claim issues; Dept. of Justice call re: same; review tax and IRS deficiency letters | 3.00 |
| 11/02/17 | HBM | Review memo on jurisdiction and IRS dispute; conference with A. Lizotte re: same   | 0.60 |
| 11/02/17 | HBM | Emails to and from US Attorney re: tax status and issues; conference with A. Lizotte re: same; email to trustee re: same                         | 0.60 |
| 11/02/17 | HBM | Review issues with IRS; conference with A. Lizotte and D. Lyne re: status, strategy and adversary proceeding                                     | 0.70 |
| 11/02/17 | HBM | Telephone call with KPMG and trustee re: latest notices from IRS and issues  | 0.80 |
| 11/02/17 | MKO | Continue review of case law re: bankruptcy court jurisdiction over tax claim; review and revise memo to A. Lizotte re: same                      | 1.30 |
| 11/03/17 | AGL | Emails re: status of Flagler sale  | 0.20 |
| 11/03/17 | AGL | Telephone conference with Florida tax assessor re: Flagler property  | 0.20 |
| 11/03/17 | DJL | Read cited IRS sections and cases  | 3.00 |
| 11/03/17 | HBM | Outline facts and issues for argument re: IRS  | 2.00 |
| 11/06/17 | AGL | Emails from Trustee, broker re: Flagler documents, revise sale pleadings   | 0.60 |
| 11/07/17 | AGL | Telephone conference with trustee r: Flagler, Davenport sales  | 0.30 |
| 11/07/17 | AGL | Draft motion to limit notice of Flagler sale; work on service issues   | 1.00 |
| 11/08/17 | AGL | Telephone conference with court re: Flagler sale hearing   | 0.10 |
| 11/09/17 | AGL | Review Flagler hearing notice; email to trustee re: same   | 0.20 |
| 11/09/17 | AGL | Research information/status of tax litigation; prepare for/attend call with Department of Justice re: same; email to KPMG re: same               | 1.50 |
| 11/09/17 | HBM | Telephone call with C. Moore re: latest re: tax claims; email to client and KPMG re: same  | 0.80 |
| 11/10/17 | AGL | Finalize and file notice of sale - Flagler   | 0.20 |
| 11/10/17 | AGL | Review October operating reports   | 0.30 |
| 11/13/17 | AGL | Call from S. Carbenia re: new address  | 0.10 |
| 11/14/17 | AGL | Analysis of KPMG memo on IRS document requests; email to DOJ re: same  | 1.00 |
| 11/14/17 | HBM | Review latest issues re: IRS and review re: same from KPMG; conference with A. Lizotte re: same; email to KPMG; email to C. Moore re: same       | 2.30 |
| 11/15/17 | HBM | Emails to and from IRS and client re: case status and issues   | 0.40 |

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| 11/16/17 | DJL | Review additional tax court cites   | 1.00 |
| 11/22/17 | AGL | Email from Carl Moore re: status of IRS review  | 0.10 |
| 11/22/17 | HBM | Emails to and from IRS re: claim issues; email to client and KPMG re: same  | 0.40 |
| 11/27/17 | AGL | Email from Broker re: closing status  | 0.10 |
| 11/30/17 | AGL | Emails with Dept. of Justice, Trustee re: latest on IRS investigation   | 0.20 |
| 11/30/17 | HBM | Emails to and from IRS re: latest issues re: tax claim and settlement; emails to and from client re: same   | 0.70 |
| 12/01/17 | AGL | Emails with KPMG re: status of IRS efforts  | 0.20 |
| 12/01/17 | HBM | Emails to and from KPMG re: IRS response  | 0.30 |
| 12/04/17 | AGL | Telephone conference from Trustee re: Woodmoor CT taxes   | 0.20 |
| 12/04/17 | AGL | Review IRS amended administrative proof of claim; telephone conferences with emails with Huron, SEC re: same; email from Carl Moore re: same                                    | 1.20 |
| 12/04/17 | HBM | Emails re: case status, Huron application and IRS   | 0.40 |
| 12/04/17 | HBM | Emails to and from C. Moore; email to trustee and KPMG re: taxes  | 0.60 |
| 12/05/17 | AGL | Review emails re: IRS computation of gains  | 0.20 |
| 12/05/17 | AGL | Begin preparation to close Flagler Drive sale   | 0.20 |
| 12/05/17 | HBM | Emails to and from I. Rona re: data exchange  | 0.30 |
| 12/05/17 | HBM | Review and respond to issues from IRS and US Attorney re: tax claim   | 0.40 |
| 12/06/17 | AGL | Email from C. Moore re: tax loss carry forward  | 0.10 |
| 12/06/17 | HBM | Email to and from IRS re: taxes   | 0.30 |
| 12/07/17 | AGL | Email from Flagler buyer re: closing; email Trustee, J. O'Brien re: same; draft clerk certificate   | 0.40 |
| 12/11/17 | JFO | Cover letter to Florida closing attorney; review clerk's certificate and court order and telephone conference with Florida closing attorney                                     | 1.00 |
| 12/12/17 | JFO | Multiple conferences with S. Gobin regarding next steps and title issues  | 1.00 |
| 12/13/17 | AGL | Email re: status of Davenport sale efforts  | 0.10 |
| 12/13/17 | HBM | Email re: Florida property status   | 0.20 |
| 12/18/17 | JFO | Discussion of title issues with S. Gobin after review of title report; call to condo association attorneys to request updated association dues owed                             | 1.50 |
| 12/19/17 | AGL | Conference with J. O'Brien re: closing issues on Flagler  | 0.20 |
| 12/20/17 | AGL | Telephone conferences and emails with Department of Justice, Huron re: IRS amended administrative claim; search register, review claim; telephone conference with KPMG re: same | 1.50 |
| 12/20/17 | HBM | Emails to and from IRS and trustee re: case status and IRS claim; review latest payoff of claim; review issues for response with A. Lizotte                                     | 1.50 |

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| 12/21/17 | AGL | Prepare for and attend conference call with KPMG re: 2014 tax dispute, new IRS claim  | 1.00 |
| 12/21/17 | AGL | Conferences with H. Murphy re: options for resolving IRS dispute; telephone conference with D. Bernstein re: same; email to C. Moore, A. Lelling re: same   | 2.20 |
| 12/21/17 | AGL | Assemble prior documents/communications with IRS re: tax history; draft outline re: same  | 2.30 |
| 12/21/17 | HBM | Draft lengthy letter to service (Moore)   | 0.40 |
| 12/21/17 | HBM | Multiple telephone calls and emails with US attorney, IRS, SEC, trustee and KPMG re: tax  | 1.00 |
| 12/21/17 | HBM | Draft outline of issues and strategy re: IRS latest claim, review prior memos and correspondence; conference with A. Lizotte re: same; telephone call with trustee and KPMG re: same  | 2.80 |
| 12/22/17 | AGL | Telephone call with Trustee re: offer on Davenport  | 0.20 |
| 12/22/17 | AGL | Draft proposed order re: IRS objection to Stoneturn and Huron fees; draft notice re: extended response deadline; confer with H. Murphy; telephone calls with S. Darr, M. Duran re: same                                     | 1.50 |
| 12/22/17 | AGL | Analysis of KPMG memos, charts re: tax dispute, chronology; emails re: same; confer with H. Murphy re: same; telephone call with C. Moore re: same, status of litigation and negotiations; telephone call with SEC re: same | 2.30 |
| 12/22/17 | HBM | Review memo from KPMG re: tax issues and analysis; email to KPMG re: questions and issues re: same  | 1.00 |
| 12/22/17 | HBM | Prepare for and participate in telephone call with C. Moore re: IRS claims and issues re: same and potential resolution; email to Trustee and KPMG re: same   | 1.50 |
| 12/26/17 | AGL | Emails re: offer on Davenport; search for title information; email to J. O'Brien re: same   | 0.50 |
| 12/26/17 | AGL | Review title issues on Flagler Drive, city ordinance dispute  | 0.50 |
| 12/26/17 | HBM | Work on resolving issues with IRS for tomorrow's hearing; revisions to order and conference with A. Lizotte re: same; email to trustee  | 1.40 |
| 12/27/17 | AGL | Confer with J. O'Brien re: Davenport, Flagler estate issues   | 0.20 |
| 12/27/17 | AGL | Emails with DOJ victim assistant, Herawati re: case status  | 0.20 |
| 12/27/17 | AGL | Prepare for and attend hearing on Huron and Stoneturn fees, IRS objection; telephone call with D. Bernstein re: same; meeting with Trustee and KPMG re: objection to IRS claim  | 3.50 |
| 12/27/17 | HBM | Meeting with trustee and KPMG re: tax issues and strategy; conference with A. Lizotte re: same; telephone   | 1.80 |

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| 12/27/17 | HBM | call with US Attorney re: same; email re: same  | 2.30 |
| 12/27/17 | JFO | Prepare for and attend hearing on interim fees and IRS issues   | 1.00 |
| 12/28/17 | JFO | Provide W9 to closing attorney; questions to closing attorney regarding association payoff; outstanding title issues and closing documentation                      | 0.50 |
| 01/02/18 | AGL | Email correspondence with broker regarding taxes and closing  | 0.20 |
| 01/02/18 | AGL | Telephone conference with S. Espindola re: case status  | 0.20 |
| 01/02/18 | AGL | Review emails re: Flagler liens, extension of closing deadline  | 0.80 |
| 01/02/18 | AGL | Review KPMG analysis of tax dispute; conference with H. Murphy re: same   | 1.20 |
| 01/02/18 | HBM | Review, respond to new Davenport draft P&S; telephone conference with CRO re: same  | 1.50 |
| 01/03/18 | AGL | Review memo and outline for KPMG re: IRS tax claims; conference with A. Lizotte re: outline of claim objection  | 0.20 |
| 01/03/18 | AGL | Review IRS proofs of claim  | 0.20 |
| 01/03/18 | AGL | Work on notice issues for Davenport sale  | 0.20 |
| 01/03/18 | AGL | Review IRS proofs of claim  | 1.10 |
| 01/04/18 | AGL | Additional work on Davenport Purchase & Sale  | 0.20 |
| 01/04/18 | AGL | Emails with Huron re: status of IRS claims filed  | 0.20 |
| 01/04/18 | AGL | Emails with Natalia Ozhekhovskaya re: case status   | 0.30 |
| 01/04/18 | AGL | Emails with Trustee, broker re: Davenport higher offer, status of existing deal   | 0.40 |
| 01/04/18 | AGL | Assist in closing of Flagler Drive sale   | 4.50 |
| 01/04/18 | AGL | Work on outline for objection to tax claim and counterclaims; research background documents   | 1.50 |
| 01/04/18 | HBM | Work on IRS claim objections  | 2.00 |
| 01/04/18 | JFO | Attention to HUD; request tax calculation; confirm Association fees; telephone conference with S. Gobin; telephone conference with A. Lizotte; email correspondence | 0.50 |
| 01/05/18 | AGL | Review USBC decision on triangular transactions; memo to KPMG re: same  | 2.00 |
| 01/05/18 | AGL | Revise outline of tax complaint; conferences with H. Murphy re: same; email and telephone conference with KPMG re: same   | 0.50 |
| 01/05/18 | HBM | Conference with A. Lizotte re: tax issues and outline of objection to IRS claim   | 0.60 |
| 01/05/18 | HBM | Telephone call with Trustee and Huron re: case status   | 1.20 |
| 01/05/18 | HBM | Review tax issues; telephone call with KPMG re: preparation analysis and summary; email to trustee re: same   | 0.50 |
| 01/05/18 | JFO | Email to S. Darr regarding deed; response to S. Gobin   |      |



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|          |     | regarding special warranty deed   |      |
| 01/08/18 | AGL | Telephone conference with D. Bernstein re: status of tax negotiations   | 0.30 |
| 01/08/18 | AGL | Prepare for and attend call with Carl Moore re: status of DOJ negotiations  | 0.50 |
| 01/08/18 | AGL | Work on Davenport purchase and sale; C. Boney version; telephone conference with broker re: same  | 0.80 |
| 01/08/18 | AGL | Prepare for/attend conference call with KPMG re: tax returns, basis for complaint, income/expense analysis  | 3.00 |
| 01/08/18 | HBM | Telephone call with C. Moore re: status and issues with IRS, settlement provisions, claim objection; conference with trustee re: same   | 0.60 |
| 01/09/18 | AGL | Additional work on Davenport sale documents; emails with broker, Trustee re: same   | 1.20 |
| 01/09/18 | AGL | Review Huron breakdown of tax expense components; telephone conference with T. Martin re: same; analysis of KPMG tax return breakdown   | 1.50 |
| 01/09/18 | JFO | Discuss Davenport deposit issue with A. Lizotte   | 0.40 |
| 01/10/18 | AGL | Emails with I. Khan re: case status   | 0.20 |
| 01/10/18 | AGL | Telephone conference with trustee re: Florida closing issues  | 0.20 |
| 01/10/18 | HBM | Conference with A. Lizotte re: IRS claim objection  | 0.30 |
| 01/10/18 | JFO | Flagler closing; attention to multiple revisions to HUD; email correspondence with S. Gobin; discuss with S. Darr   | 2.20 |
| 01/11/18 | AGB | Meet with A. Lizotte re: tax research assignment (0.2); conduct online research re. objection to tax claims in bankruptcy and procedural concerns (2.6); follow-up discussion with A. Lizotte concerning preliminary findings/thoughts re: same (0.2) | 3.00 |
| 01/11/18 | AGL | Review December monthly operating reports   | 0.30 |
| 01/11/18 | AGL | Prepare for and attend conference call with Trustee, H. Murphy re: tax litigation   | 1.30 |
| 01/11/18 | AGL | Review updated tax reconciliation charts; lengthy telephone conference with T. Martin re: same  | 1.50 |
| 01/11/18 | HBM | Review memo from A. Lizotte and Huron re: tax issues; telephone call with Trustee and Huron re: same  | 1.30 |
| 01/11/18 | JFO | Attention to HUD; call to S. Gobin; call to Florida broker and S. Darr; follow up on wires  | 1.00 |
| 01/12/18 | AGB | Further review and analysis of research materials gathered re. tax issue  | 1.00 |
| 01/12/18 | AGB | Continue review and analysis of cases and materials concerning objections to tax claims (3.1); Meet with H. Murphy, A. Lizotte re. same (0.2)   | 3.30 |
| 01/12/18 | AGL | Review 2012 letter denying tax refund   | 0.20 |
| 01/12/18 | AGL | Meeting with H. Murphy, A. Brier re: tax research, 505  | 0.50 |



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| 01/12/18 | AGL | rights given posture of case; begin reviewing cases<br>Review new purchase and sale for Davenport; telephone<br>conferences with trustee, broker re: same; draft<br>revisions; follow up on title, service issues | 2.00 |
| 01/12/18 | HBM | Conference with A. Brier re: tax issues   | 0.30 |
| 01/12/18 | JFO | Flagler sale; email correspondence S. Darr regarding<br>transfer of funds; email S. Gobin regarding SEC<br>settlement   | 0.50 |
| 01/12/18 | JFO | Davenport sale; conference with A. Lizotte regarding<br>Davenport sale and review title document; review<br>settlement filing with SEC  | 1.20 |
| 01/15/18 | AGB | Begin drafting memo re: tax issue   | 1.00 |
| 01/15/18 | AGL | Emails with Trustee, broker re: Davenport sale<br>documents; draft sale motion, sale notice, and motion to<br>limit notice  | 2.00 |
| 01/16/18 | AGB | Continue drafting memorandum re. tax issue,<br>conducting supplemental research as necessary  | 4.00 |
| 01/16/18 | AGL | Telephone conferences with Trustee, broker re: more<br>changes to Davenport documents   | 0.30 |
| 01/16/18 | AGL | Review emails from KPMG re: AMT tax; telephone<br>conference with trustee, H. Murphy re: tax issues   | 0.40 |
| 01/16/18 | HBM | Review memo from KPMG re: tax analysis; telephone<br>call with trustee re: same   | 0.50 |
| 01/16/18 | JFO | Draft Davenport Escrow Agreement  | 1.00 |
| 01/17/18 | AGL | Work on escrow letter for Davenport; conference with J.<br>O'Brien  | 0.40 |
| 01/17/18 | AGL | Analysis of memo re: tax litigation, procedures, and<br>related cases; conference with A. Brier re: same  | 3.00 |
| 01/17/18 | HBM | Emails re: tax issues   | 0.30 |
| 01/18/18 | AGL | Telephone conferences with Trustee re: KPMG meeting<br>results  | 0.50 |
| 01/18/18 | HBM | Telephone call with trustee re: KPMG meeting and<br>issues and strategy re: tax issues  | 0.50 |
| 01/18/18 | JFO | Prepare escrow agreement; email correspondence A.<br>Lizotte  | 0.80 |
| 01/19/18 | AGL | Review Davenport inspection report; telephone<br>conferences with Trustee re: same, purchase price issues   | 0.70 |
| 01/19/18 | HBM | Telephone call with trustee re: sale of Florida property,<br>issues with inspection and response re: same   | 0.30 |
| 01/19/18 | JFO | Call to T. Keller regarding title matters; review title<br>matters  | 0.80 |
| 01/21/18 | AGB | Continue revision of memorandum re. tax issue,<br>conducting supplemental research as required  | 3.00 |
| 01/22/18 | AGB | Continue revision of memorandum re. tax issue,<br>conducting supplemental research as required  | 1.70 |
| 01/23/18 | AGB | Complete revision of memorandum re. tax issue,  | 5.00 |

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|          |     | conducting supplemental research as required and send final draft to A. Lizotte for review   |      |
| 01/23/18 | AGL | Meeting with A. Brier re: tax litigation issues; review cases on 505, amended returns  | 1.00 |
| 01/24/18 | AGB | Research re: follow-up items from meeting re: tax issue and report to A. Lizotte concerning same   | 0.40 |
| 01/24/18 | AGB | Attend meeting with S. Darr, H. Murphy, and A. Lizotte to discuss tax concerns with KPMG   | 1.00 |
| 01/24/18 | AGL | Telephone conference and email with trustee re: Davenport deposit  | 0.20 |
| 01/24/18 | AGL | Prepare for and attend meeting with KPMG re: tax strategy, IRS dispute; analysis of tax memo re: procedural considerations                                     | 2.00 |
| 01/24/18 | HBM | Review memo re: IRS claim and issues; meeting with KPMG re: same; conference with trustee re: same   | 2.30 |
| 01/25/18 | AGL | Review cases on split tax year   | 0.40 |
| 01/25/18 | HBM | Emails re: tax issues with KPMG  | 0.30 |
| 01/29/18 | HBM | Telephone call with trustee re: case status  | 0.20 |
| 02/01/18 | HBM | Telephone call with Trustee re: case status and meeting; email re: same  | 0.40 |
| 02/05/18 | AGL | Review repair estimates for Davenport; conference with trustee   | 0.30 |
| 02/05/18 | AGL | Review email from KPMG re: 2014 casualty loss; research criminal docket for further details  | 0.70 |
| 02/05/18 | HBM | Meeting with trustee re: case status, issues and interview with reporter   | 3.50 |
| 02/06/18 | AGL | Telephone conference with trustee re: new Davenport offer  | 0.10 |
| 02/06/18 | AGL | Telephone conference with IRS re: automatic stay   | 0.10 |
| 02/06/18 | AGL | Email from KPMG re: status of amended tax returns  | 0.20 |
| 02/06/18 | AGL | Conference with T. Martin, H. Murphy re: asset seizures, administrative expense allowance for tax returns; further work on calculating administrative expenses | 1.00 |
| 02/06/18 | HBM | Emails to and from KPMG re: revised tax returns; conference with A. Lizotte re: same   | 0.40 |
| 02/06/18 | HBM | Review emails and draft memo from KPMG and emails re: same; conference with A. Lizotte re: same  | 1.50 |
| 02/07/18 | AGL | Email with CA counsel re: turnover of retainer   | 0.10 |
| 02/08/18 | AGL | Telephone conferences with trustee re: new Davenport offer - Ramos; review Purchase & Sale; begin drafting revisions   | 0.80 |
| 02/09/18 | AGL | Work on revisions to Ramos Davenport Purchase & Sale; email to Trustee, broker re: same  | 1.00 |
| 02/09/18 | JFO | Review Davenport purchase and sale for A. Lizotte  | 0.50 |
| 02/12/18 | AGL | Review email from R. Mayeux re: case   | 0.10 |

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| 02/12/18 | AGL | Review January MOR's  | 0.30 |
| 02/12/18 | AGL | Telephone conference with T. Keller re: Davenport sale;<br>telephone conference with Trustee, buyer's broker re:<br>sale, purchase and sale revisions; email re: same                   | 0.60 |
| 02/13/18 | AGL | Email from KPMG re: response for amendments to tax<br>returns   | 0.20 |
| 02/13/18 | AGL | Emails with KPMG, H. Murphy re: status of preparing<br>amended returns  | 0.30 |
| 02/13/18 | AGL | Work on latest version of Ramos purchase and sale;<br>email to Trustee re: same   | 0.80 |
| 02/13/18 | HBM | Emails to and from KPMG re: amended returns and<br>issues re: same  | 0.30 |
| 02/14/18 | AGL | Review edits to Davenport purchase and sale;<br>conference with J. O'Brien re: same; telephone<br>conference with trustee re: same; work on escrow letter                               | 0.60 |
| 02/14/18 | JFO | Davenport property sale; put together escrow letter;<br>conference with A. Lizotte regarding steps; discuss title<br>matters  | 1.00 |
| 02/15/18 | AGL | Emails with broker re: deposit, escrow letter   | 0.20 |
| 02/16/18 | AGL | Emails re: Davenport wire   | 0.10 |
| 02/16/18 | AGL | Review draft amended tax returns; conferences with<br>trustee, H. Murphy re: same; draft summary for<br>Department of Justice   | 2.00 |
| 02/16/18 | HBM | Emails to and from KPMG; brief conference with A.<br>Lizotte re: same   | 0.30 |
| 02/16/18 | HBM | Review amended returns by KPMG for 2012-2014;<br>review e-application re: same; email re: same  | 2.00 |
| 02/19/18 | AGL | Emails with KPMG re: edits to amended returns   | 0.20 |
| 02/19/18 | AGL | Work on new Davenport sale motion and notice -<br>Ramos   | 0.70 |
| 02/19/18 | HBM | Emails and telephone call with trustee re: case status  | 0.20 |
| 02/20/18 | AGL | Emails re: clearing title for Davenport sale; search for<br>Sanderley final judgment; conference with J. O'Brien re:<br>same  | 0.50 |
| 02/20/18 | HBM | Work on issues re: IRS; review latest draft motions;<br>brief conference with A. Lizotte re: same   | 1.00 |
| 02/20/18 | JFO | Review court order regarding release of SEC property<br>lien; email correspondence with A. Lizotte  | 0.40 |
| 02/21/18 | AGL | Finalize and file Davenport sale pleadings - Ramos;<br>work on service, deposit issues; draft motion to limit<br>notice; telephone conference with trustee, court re:<br>same, hearings | 1.80 |
| 02/21/18 | JFO | Conference with A. Lizotte regarding notice of order;<br>review service addresses; call to Polk County Tax<br>authority   | 0.50 |
| 02/22/18 | AGL | Conference with court re: Davenport sale notice; work   | 0.20 |

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|          |     | on service  |      |
| 02/26/18 | AGL | Work on service of sale hearing notice  | 0.20 |
| 02/26/18 | AGL | Telephone conference with trustee re: Davenport counteroffer  | 0.20 |
| 03/02/18 | AGL | Review KPMG tax return reconciliation   | 0.50 |
| 03/05/18 | AGL | Email from trustee re: Davenport counteroffer   | 0.10 |
| 03/05/18 | AGL | Email to trustee re: tax reconciliation   | 0.20 |
| 03/06/18 | AGL | Telephone conferences, emails with trustee, broker re: Davenport counteroffer issues  | 0.50 |
| 03/06/18 | AGL | Emails with trustee re: buyer interested in Florida forfeited property; search for/review forfeiture order and exhibits     | 0.50 |
| 03/06/18 | AGL | Review tax return reconciliations; conference with H. Murphy, Trustee re: same, meeting to discuss                          | 0.80 |
| 03/07/18 | AGL | Review IRS request for documents under Portugal treaty  | 0.10 |
| 03/07/18 | AGL | Review February MOR's   | 0.30 |
| 03/07/18 | AGL | Prepare for and attend conference call with KPMG re: amendments to tax returns; letter to Carl Moore (DOJ) re: same         | 1.30 |
| 03/07/18 | HBM | Review summary of amended returns; telephone call with trustee and A. Lizotte re: same; prepare for KPMG call               | 0.60 |
| 03/07/18 | HBM | Telephone call with KPMG and trustee re: amended returns and issues re: same and IRS status                                 | 1.00 |
| 03/08/18 | AGL | Telephone conference with Trustee re: Davenport counteroffer  | 0.20 |
| 03/08/18 | AGL | Emails with KPMG, Trustee re: DOJ tax negotiations; work on response to DOJ   | 0.60 |
| 03/08/18 | HBM | Telephone call with C. Moore re: IRS claim issues and status of settlement process, memo re: same; email re: same           | 1.20 |
| 03/09/18 | AGL | Further revisions to letter to C. Moore re: amended returns, status of tax dispute  | 0.70 |
| 03/09/18 | HBM | Review and revise draft memo to C. Moore re: amended returns  | 0.40 |
| 03/12/18 | AGL | Review Davenport sale order; emails re: closing   | 0.20 |
| 03/12/18 | HBM | Emails to IRS   | 0.20 |
| 03/12/18 | JFO | email correspondence re closing; contact T. Keller and L. Coffman at Title Co., review title issues from interim title exam | 1.20 |
| 03/13/18 | JFO | email correspondence A. Lizotte and call to L. Coffman  | 0.30 |
| 03/14/18 | AGL | Conference with M. Spanos re: sale order  | 0.10 |
| 03/14/18 | AGL | Emails, telephone conferences with KPMG, DOJ re: impact of amended returns on real business                                 | 0.40 |
| 03/14/18 | AGL | Review Trustee response to Portugal document/information request; conference with H.  | 1.50 |

|          |     |  |      |
|----------|-----|--|------|
| 03/14/18 | HBM | Murphy re: same; work on revisions   | 0.50 |
|          |     | Work on response to document request from IRS; review and revise draft response; conference with A. Lizotte re: same   |      |
| 03/14/18 | HBM | Emails to and from C. Moore and KPMG re: tax issue; prepare further information re: request  | 0.70 |
| 03/14/18 | MXC | Travel to Bankruptcy Court re: document certification  | 0.40 |
| 03/15/18 | AGL | Review revised letter for Portuguese tax authorities   | 0.20 |
| 03/16/18 | JFO | Email correspondence re estoppel; note incorrect amounts and call L. Coffman to inquire; corrected estoppel issued. Email to S. Darr re estoppel   | 1.50 |
| 03/19/18 | AGL | Review title for Woodmoor Court sale; conference with J. O'Brien re: same; retrieve SEC consent judgment; memo re: same, title concerns  | 0.50 |
| 03/19/18 | JFO | Discussion with A. Lizotte re SEC release language, review release language in relation to lien release required; discuss with L. Coffman; follow-up email explaining difficulty to obtain release.  | 2.20 |
| 03/20/18 | AGL | Telephone conference with T. Greenway re: status of tax dispute  | 0.10 |
| 03/20/18 | AGL | Emails with J. O'Brien re: Davenport close   | 0.20 |
| 03/20/18 | JFO | Review title matters to be resolved for sale; email to L. Coffman discussing same.   | 0.80 |
| 03/21/18 | AGL | Emails with DOJ, KCC re: revisions to creditor list  | 0.20 |
| 03/21/18 | AGL | Review closing documents for Davenport   | 0.20 |
| 03/21/18 | JFO | Review title matters with L. Coffman on telephone. Questions on amounts and tax deed issue. Discuss bankruptcy motions that are required for title company; search PACER; obtain copies and forward to L. Coffman; discuss language in order and sufficiency of certified copies | 2.50 |
| 03/22/18 | AGL | Emails re: closing on Davenport  | 0.20 |
| 03/22/18 | ANM | Travel to USDC Boston; coordinate with clerk to obtain certified copy of final judgment re: 124 Woodmoor Ct, Davenport, FL (Ramos property); travel from USDC Boston   | 1.00 |
| 03/22/18 | HBM | Telephone call with trustee re: case status and issues   | 0.30 |
| 03/22/18 | JFO | Prepare amendment to extend P&S date. Circulate. Correspondence  | 1.00 |
| 03/23/18 | AGL | Emails re: Davenport closing extension   | 0.20 |
| 03/23/18 | JFO | Follow up on extension; questions to L. Coffman re bankruptcy papers   | 1.00 |
| 03/26/18 | HBM | Telephone call with trustee re: IRS; conference with A. Lizotte re: issues and strategy re: objection to claim   | 0.60 |
| 03/26/18 | JFO | Prepare closing binder for S. Darr to sign; email correspondence L. Coffman. Review HUD. Follow-up   | 3.80 |

|          |     |   |      |
|----------|-----|---|------|
|          |     | correspondence S. Darr; L. Coffman  |      |
| 03/27/18 | AGL | Conference with J. O'Brien re: tax ID numbers   | 0.10 |
| 03/27/18 | AGL | Begin drafting complaint objecting to IRS claims  | 2.50 |
| 03/27/18 | MXC | Travel to Bankruptcy Court to certify motion  | 0.20 |
| 03/28/18 | JFO | Attention to signed documents; prepare cover letter to L. Coffman enclosing signature pages and bankruptcy filings. Discuss HUD with L. Coffman | 1.20 |
| 03/30/18 | AGL | Research basis for objection to IRS claims'   | 0.60 |

| <u>Attorney</u>         | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>       |
|-------------------------|--------------|-------------|---------------------|
| ANDREA G. BRIER         | 1.00         | 410.00      | 410.00              |
| ANDREA G. BRIER         | 23.40        | 425.00      | 9,945.00            |
| ANDREA N. MAZZARELLA    | 1.00         | 220.00      | 220.00              |
| ANDREA N. MAZZARELLA    | 1.00         | 225.00      | 225.00              |
| ANDREW G. LIZOTTE       | 117.80       | 595.00      | 70,091.00           |
| ANDREW G. LIZOTTE       | 62.90        | 615.00      | 38,683.50           |
| CHARLES R. BENNETT, JR. | 6.60         | 625.00      | 4,125.00            |
| DANIEL J. LYNE          | 7.00         | 625.00      | 4,375.00            |
| HAROLD B. MURPHY        | 101.50       | 625.00      | 63,437.50           |
| JONATHAN F.X. O'BRIEN   | 14.20        | 475.00      | 6,745.00            |
| JONATHAN F.X. O'BRIEN   | 28.30        | 490.00      | 13,867.00           |
| MANDY CASPERSON         | 0.40         | 220.00      | 88.00               |
| MANDY CASPERSON         | 0.60         | 225.00      | 135.00              |
| MICHAEL K. O'NEIL       | 30.90        | 345.00      | 10,660.50           |
| <b>Total Fees</b>       |              |             | <b>\$223,007.50</b> |

EXHIBIT I

SERVICES RELATING TO FEE/EMPLOYMENT APPLICATIONS

| <u>Date</u> | <u>Atty</u> | <u>Description</u>   | <u>Hours</u> |
|-------------|-------------|--|--------------|
| 03/01/17    | AGL         | Review prior fee application; begin categorizing time for third fee application              | 7.00         |
| 03/02/17    | AGL         | Begin drafting narrative for third application   | 3.50         |
| 03/06/17    | AGL         | Additional work on fee application narrative   | 2.50         |
| 03/08/17    | AGL         | Work on category narratives  | 1.00         |
| 03/09/17    | AGL         | Categorize February time entry   | 0.50         |
| 03/13/17    | AGL         | Work on fee application narrative  | 6.00         |
| 03/13/17    | HBM         | Work on fee application; conference with A. Lizotte re: same                                 | 1.50         |
| 03/14/17    | AGL         | Further drafting of third fee application - categories                                       | 1.50         |
| 03/15/17    | AGL         | Telephone conference with Tim Martin re: Huron interim fee application                       | 0.20         |
| 03/20/17    | AGL         | Revisions to fee application narrative; input amounts  | 0.60         |
| 03/24/17    | AGL         | Revisions to fee application narrative   | 2.00         |
| 03/28/17    | AGL         | Conference with H. Murphy re: revisions to third fee application                             | 0.70         |
| 03/28/17    | HBM         | Review and revise draft third fee application; conference with A. Lizotte re: same           | 1.50         |
| 03/30/17    | AGB         | Complete review of Telexfree Third Interim Fee Application                                   | 0.50         |
| 04/03/17    | AGL         | Conference with T. Martin re: fee applications   | 0.20         |
| 04/04/17    | AGL         | Final review of third fee application  | 1.00         |
| 04/10/17    | AGL         | Review Huron's draft third interim fee application; telephone conference with Huron re: same | 1.50         |
| 04/11/17    | AGL         | Finalize/file Huron and M&K fee applications; conference with KCC re: same                   | 0.60         |
| 04/12/17    | AGL         | Review hearing notice on fee applications; email to KCC, Trustee re: same                    | 0.30         |
| 04/17/17    | AGL         | Emails with KCC re: service of fee hearing notices   | 0.20         |
| 04/18/17    | AGL         | Review c/s for fee hearings; email to T. Martin  | 0.30         |
| 05/08/17    | AGL         | Telephone conference with trustee re: 5/10 fee hearing; review docket, service, applications | 0.50         |
| 05/10/17    | AGL         | Prepare for hearing on third interim fee application   | 0.70         |
| 05/10/17    | HBM         | Prepare for and attend hearing on first application for interim fees                         | 1.30         |
| 06/01/17    | MKO         | Review pleading of interest re: fee applications; confer                                     | 0.30         |



|          |     |  |      |
|----------|-----|--|------|
|          |     | with H. Murphy re: same  |      |
| 07/31/17 | AGL | Telephone conference with trustee re: KPMG time entry; review entries  | 0.60 |
| 08/09/17 | AGL | Telephone conference with T. Greenway re: KPMG fees  | 0.10 |
| 08/10/17 | AGL | Review/comment on KPMG interim fee application   | 0.40 |
| 08/14/17 | AGL | Review KPMG fee hearing notice; emails re: same  | 0.10 |
| 08/23/17 | AGL | Review proposed c/s re: KPMG, Milligan Rona fee hearings   | 0.20 |
| 09/06/17 | AGL | Emails with KPMG re: fee hearing   | 0.20 |
| 09/08/17 | AGL | Telephone conferences with B. Court re: fee hearing service issues   | 0.20 |
| 09/11/17 | AGL | Emails re: order approving KPMG fees   | 0.10 |
| 11/07/17 | AGL | Review Huron draft fee application; conference with T. Martin re: same   | 1.00 |
| 11/09/17 | AGL | Emails with T. Martin re: revisions to Huron fee application   | 0.20 |
| 11/10/17 | AGL | Conference with H. Murphy re: Huron fee application  | 0.30 |
| 11/10/17 | HBM | Review Huron draft invoice; telephone call with trustee re: same   | 1.00 |
| 12/01/17 | AGL | Conference with Huron, H. Murphy re: Huron fee application   | 0.50 |
| 12/04/17 | AGL | Work on service of Stoneturn, Huron fee applications   | 0.30 |
| 12/05/17 | AGL | Review fee hearing notices; arrange for service  | 0.20 |
| 12/07/17 | AGL | Emails from KCC re: service of fee application notice  | 0.30 |
| 12/22/17 | HBM | Review and revise draft order to deal with IRS potential objection; conference with A. Lizotte re: same  | 0.70 |
| 12/26/17 | AGL | Prepare for December 27th hearing on fees and IRS objection  | 0.50 |
| 12/26/17 | AGL | Review IRS comments to Huron/Stoneturn fee order; work on revisions; telephone calls and emails to Trustee, Stoneturn, H. Murphy re: same; emails with C. Moore re: same; draft supplement | 1.50 |
| 01/31/18 | AGL | Assemble retention documents for Huron, M&K re: rate caps  | 0.40 |
| 03/05/18 | AGL | Search docket re: Mesirow/Huron terms of retention; draft motion to modify order of retention; telephone conference with trustee re: same  | 2.00 |
| 03/08/18 | AGL | Begin categorizing time entry for fourth fee application   | 2.00 |
| 03/09/18 | AGL | Additional work categorizing time entry  | 2.00 |
| 03/12/18 | AGL | Work on categorizing time entry  | 1.00 |
| 03/13/18 | AGL | Begin drafting narrative of fee application  | 3.60 |
| 03/22/18 | AGL | Work on LEEDS aspect of fee application  | 0.30 |
| 03/23/18 | AGL | Work on narrative for fourth interim fee application   | 3.20 |

| <u>Attorney</u>   | <u>Hours</u> | <u>Rate</u> | <u>Amount</u>      |
|-------------------|--------------|-------------|--------------------|
| ANDREA G. BRIER   | 0.50         | 410.00      | 205.00             |
| ANDREW G. LIZOTTE | 37.50        | 595.00      | 22,312.50          |
| ANDREW G. LIZOTTE | 14.50        | 615.00      | 8,917.50           |
| HAROLD B. MURPHY  | 6.00         | 625.00      | 3,750.00           |
| MICHAEL K. O'NEIL | 0.30         | 345.00      | 103.50             |
| <b>Total Fees</b> |              |             | <b>\$35,288.50</b> |

EXHIBIT J  
DISBURSEMENTS

| <u>Disbursements</u>           | <u>Amount</u>             |
|--------------------------------|---------------------------|
| Certified Copies               | 81.20                     |
| Delivery/Fed. Express          | 15.00                     |
| Delivery/Fed. Express          | 620.93                    |
| Delivery/Fed. Express          | 1,718.14                  |
| Filing/Recording Fee           | 225.40                    |
| Lexis Research                 | 1,972.29                  |
| Mailings                       | 565.00                    |
| Meals                          | 556.11                    |
| Miscellaneous                  | 238.40                    |
| Morningside Translations       | 85.00                     |
| Morningside Translations       | 85.00                     |
| Morningside Translations       | 125.00                    |
| Morningside Translations       | 307.20                    |
| Morningside Translations, Inc. | 85.00                     |
| Morningside Translations, Inc. | 85.00                     |
| Morningside Translations, Inc. | 209.60                    |
| Outside Counsel/Acct.          | 550.30                    |
| Photocopying Outside           | 33.00                     |
| Photocopying/Imaging In-House  | 12,347.10                 |
| Postage                        | 3,280.42                  |
| Telefax                        | 5.50                      |
| Telephone                      | 203.60                    |
| Telephone                      | 50.70                     |
| Travel/Parking                 | 158.81                    |
| Westlaw Research               | 2,291.79                  |
| <b>Total Disbursements</b>     | <b><u>\$25,895.49</u></b> |

TABLE 1

## SUMMARY OF TIMEKEEPERS INCLUDED IN THIS FEE APPLICATION

| NAME                    | TITLE OR POSITION | DEPARTMENT, GROUP, OR SECTION | DATE OF FIRST ADMISSION | FEES BILLED<br>IN THIS APPLICATION | HOURS BILLED<br>IN THIS APPLICATION | HOURLY RATE BILLED  |                              | NUMBER OF RATE INCREASES<br>SINCE CASE INCEPTION |
|-------------------------|-------------------|-------------------------------|-------------------------|------------------------------------|-------------------------------------|---------------------|------------------------------|--|
|                         |                   |                               |                         |                                    |                                     | IN THIS APPLICATION | IN FIRST INTERIM APPLICATION |  |
| Charles R. Bennett, Jr. | Shareholder       | Bankruptcy                    | 1974                    | \$71,312.50                        | 114.10                              | \$625.00            | \$550.00                     | 2  |
| Theodore J. Folkman     | Shareholder       | Litigation                    | 2001                    | \$14,283.50                        | 26.90                               | \$530.99            | \$460.00                     | 4  |
| Andrew G. Lizotte       | Shareholder       | Bankruptcy                    | 1991                    | \$543,890.00                       | 904.00                              | \$601.65            | \$535.81                     | 4  |
| Daniel J. Lyne          | Shareholder       | Litigation                    | 1981                    | \$4,375.00                         | 7.00                                | \$625.00            |                              |  |
| Harold B. Murphy        | Shareholder       | Bankruptcy                    | 1981                    | \$169,875.00                       | 271.80                              | 625.00              | \$550.00                     | 2  |
| Daniel M. Rabinovitz    | Shareholder       | Litigation                    | 1990                    | \$53,790.00                        | 97.80                               | \$550.00            |                              |  |
| Andrea G. Brier         | Sr. Associate     | Bankruptcy                    | 2010                    | \$56,162.00                        | 134.80                              | \$416.63            |                              | 2  |
| Christopher M. Condon   | Sr. Associate     | Bankruptcy                    | 2002                    | \$6,330.50                         | 12.70                               | \$498.46            | \$424.38                     | 4  |
| Shawn Lu                | Sr. Associate     | Litigation                    | 2010                    | \$1,440.50                         | 4.30                                | \$335.00            |                              | 3  |
| Andrea L. MacIver       | Sr. Associate     | Litigation                    | 2011                    | \$11,082.50                        | 34.10                               | \$325.00            |                              | 1  |
| Jonathan F.X. O'Brien   | Sr. Associate     | Corporate                     | 2000                    | \$21,277.00                        | 43.90                               | \$484.67            | \$410.00                     | 4  |
| Michael K. O'Neil       | Associate         | Bankruptcy                    | 2012                    | \$30,777.00                        | 88.50                               | \$347.76            | \$294.40                     | 4  |

Case Name: TelexFree, LLC et al

Case Number: 14-40987-MSH

Applicant's Name: Murphy &amp; King, Prof. Corp.

Date of Application: April 17, 2018

Interim or Final: Interim

TABLE 1 (Continued)

## SUMMARY OF TIMEKEEPERS INCLUDED IN THIS FEE APPLICATION

| NAME                 | TITLE OR POSITION | DEPARTMENT, GROUP, OR SECTION | DATE OF FIRST ADMISSION | FEES BILLED<br>IN THIS APPLICATION | HOURS BILLED<br>IN THIS APPLICATION | HOURLY RATE BILLED  |                              | NUMBER OF RATE INCREASES<br>SINCE CASE INCEPTION |
|----------------------|-------------------|-------------------------------|-------------------------|------------------------------------|-------------------------------------|---------------------|------------------------------|--|
|                      |                   |                               |                         |                                    |                                     | IN THIS APPLICATION | IN FIRST INTERIM APPLICATION |  |
| Mandy Casperson      | Paralegal         | Bankruptcy                    |                         | \$1,543.00                         | 7.00                                | \$220.43            |                              | 3  |
| Andrea N. Mazzarella | Paralegal         | Litigation                    |                         | \$15,145.50                        | 67.50                               | \$224.38            |                              | 3  |
| Christine E. Wilkins | Paralegal         | Litigation                    |                         | \$18,417.50                        | 83.40                               | \$220.83            | \$190.03                     | 4  |
| 1 If applicable      |                   |                               |                         |                                    |                                     |                     |                              |  |

Case Name:

TelexFree, LLC et al

Case Number:

14-40987-MSH

Applicant's Name:

Murphy &amp; King, Prof. Corp.

Date of Application:

April 17, 2018

Interim or Final:

Interim

UST Form 11-330-B (2013)

**EXHIBIT D -2**

**SUMMARY OF EXPENSE REIMBURSEMENT REQUESTED BY CATEGORY**

(See Guidelines ¶ C.8. for project category information.)

|        | CATEGORY   | AMOUNT      |
|--------|--|-------------|
|        | Copies   | \$12,347.10 |
|        | Outside Printing                                       | \$33.00     |
|        | Telephone  | \$254.30    |
|        | Facsimile  | \$5.50      |
|        | Online Research  | \$4,264.08  |
|        | Delivery Services/Couriers                             | \$2,354.07  |
|        | Postage  | \$3,845.42  |
|        | Local Travel   | \$158.81    |
|        | Out-of-Town Travel:                                    |             |
|        | (a) Transportation                                     |             |
|        | (b) Hotel  |             |
|        | (c) Meals  |             |
|        | (d) Ground Transportation                              |             |
| Delete | (e) Other (miscellaneous)                              | \$238.40    |
| Add    | Click Add button to add an out of town travel category |             |
|        | Meals (local)  | \$556.11    |
|        | Court Fees   | \$306.60    |
|        | Subpoena Fees  |             |
|        | Witness Fees   |             |
|        | Deposition Transcripts                                 |             |
|        | Trial Transcripts                                      |             |
|        | Trial Exhibits   |             |
|        | Litigation Support Vendors                             |             |
|        | Experts  | \$550.30    |
|        | Investigators  |             |
|        | Arbitrators/Mediators                                  |             |
| Delete | Other-Morningside Translation                          | \$981.80    |
| Add    | Click Add button to add another category               |             |

Case Name: TelexFree, LLC et al  
Case Number: 14-40987-MSH  
Applicant's Name: Murphy & King, Prof. Corp.  
Date of Application: April 17, 2018  
Interim or Final: Interim

TABLE 3

CUSTOMARY AND COMPARABLE COMPENSATION DISCLOSURES WITH FEE APPLICATION

(See Guidelines C.3. for definitions of terms used in this Exhibit.)

| CATEGORY OF TIMEKEEPER                                | BLENDED HOURLY RATE  |                                   |
|---|--|-----------------------------------|
|   | BILLED OR COLLECTED<br>Firm or offices for the period of<br>3/1/17 – 3/31/18 | BILLED<br>In this fee application |
| Sr./Equity Partner/Shareholder                        | \$601.90   | \$603.21                          |
| Sr. Associate (7 or more years since first admission) | \$404.18   | \$419.03                          |
| Associate (4-6 years since first admission)           | \$348.30   | \$347.76                          |
| Jr. Associate (1-3 years since first admission)       |  |                                   |
| Paralegal   | \$218.63   | \$222.33                          |
| All timekeepers aggregated                            | \$470.88   | \$537.31                          |

Bank is not a full service law firm nor does it practice exclusively in bankruptcy. The blended hourly rates set forth herein are for all timekeepers who rendered services in this matter based on total hours billed for the fiscal year April 1, 2015 through March 31, 2016 as well as time billed in this application.

Case Name: TelexFree, LLC et al  
 Case Number: 14-40987-MSH  
 Applicant's Name: Murphy & King, Prof. Corp.  
 Date of Application: April 17, 2018  
 Interim or Final: Interim  
 USTForm 11-330-B (2013)



Table 4

## Rate Changes and Effect on Compensation

| BAR DATE                   | ATTORNEY   | 01/01/14 RATES | 01/01/15 RATES | 01/01/16 RATES | 01/01/17 RATES | 01/01/18 RATES |
|----------------------------|------------|----------------|----------------|----------------|----------------|----------------|
| MA '81                     | HBM        | \$635.00       | \$650.00       | \$675.00       | \$675.00       | \$695.00       |
| MA'74                      | CRB        | \$635.00       | \$650.00       | \$675.00       | \$675.00       | \$695.00       |
| MA '82                     | DLE        | \$615.00       | \$615.00       | \$635.00       | \$650.00       | \$665.00       |
| MA '91                     | AGL        | \$530.00       | \$550.00       | \$570.00       | \$595.00       | \$615.00       |
| MA '94                     | DIL        |                |                |                | \$650.00       | \$665.00       |
| MA '01                     | DJD        | \$475.00       | \$495.00       | \$510.00       | \$535.00       | \$550.00       |
| MA '07, NJ '95, PA '95     | TJF        | \$450.00       | \$470.00       | \$495.00       | \$515.00       | \$535.00       |
| MA '06                     | CBP        |                | \$495.00       | \$510.00       |                |                |
| MA'91, IL'90, CO'10, FL'10 | SMV        |                | \$390.00       | \$415.00       | \$450.00       | \$465.00       |
| MA '87                     | DMR        |                |                |                | \$550.00       | \$550.00       |
| MA '01                     | KRC        | \$470.00       | \$490.00       | \$510.00       | \$535.00       | \$550.00       |
| MA '00, MA '09             | CMC        | \$415.00       | \$435.00       | \$465.00       | \$485.00       | \$500.00       |
| MA '02                     | JFO        | \$410.00       | \$430.00       | \$450.00       | \$475.00       | \$490.00       |
| MA '10                     | JCE        | \$465.00       | \$465.00       |                |                |                |
|                            | SL         |                | \$300.00       | \$320.00       | \$335.00       | \$350.00       |
|                            | ALM        |                |                |                | \$325.00       | \$335.00       |
| MA '12, NH '12             | MKO        | \$290.00       | \$305.00       | \$320.00       | \$345.00       | \$360.00       |
| MA '10, NY '11             | PCO        | \$290.00       | \$305.00       | \$325.00       |                |                |
| MA '08, NY '08             | AMJ        | \$315.00       | \$330.00       |                |                |                |
| MA '13                     | EAM        | \$225.00       | \$235.00       | \$255.00       | \$270.00       | \$425.00       |
| MA '10 NY'11               | AGB        |                |                |                | \$410.00       |                |
|                            | PARALEGALS | \$190.00       | \$200.00       | \$210.00       | \$220.00       | \$225.00       |

Shareholder rates have been capped at \$550 per hour through December 31, 2015, have been capped at \$590 per hour for services rendered on and after January 1, 2016, have been capped at \$625 per hour for services rendered on or after January 1, 2017, and have been capped at \$650 per hour for services rendered on and after May 1, 2018. The rate adjustments since M&K's retention in these cases resulted in an increase in aggregation compensation of \$113,691.00 over the amount determined in accordance with the hourly rates in effect as of the date of M&K's retention, taking into account the shareholder rate cap.