

1 ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
2 DAVID R. ZARO (BAR NO. 124334)
TIM C. HSU (BAR NO. 279208)
3 865 South Figueroa Street, Suite 2800
Los Angeles, California 90017-2543
4 Phone: (213) 622-5555
Fax: (213) 620-8816
5 E-Mail: dzaro@allenmatkins.com
thsu@allenmatkins.com

6 ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP
7 EDWARD G. FATES (BAR NO. 227809)
8 One America Plaza
600 West Broadway, 27th Floor
9 San Diego, California 92101-0903
Phone: (619) 233-1155
10 Fax: (619) 233-1158
E-Mail: tfates@allenmatkins.com

11 Attorneys for Receiver
12 Thomas A. Seaman

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION**

16 SECURITIES AND EXCHANGE
COMMISSION,

17 Plaintiff,

18 v.

19 STEVE CHEN, USFIA, INC.,
20 ALLIANCE FINANCIAL
GROUP, INC., AMAUCTION, INC.,
21 ABORELL MGMT I, LLC, ABORELL
22 ADVISORS I, LLC, ABORELL
REIT II, LLC, AHOME REAL
23 ESTATE, LLC, ALLIANCE
NGN, INC., APOLLO REIT I, INC.,
24 APOLLO REIT II, LLC, AMKEY, INC.,
25 US CHINA CONSULTATION
ASSOCIATION, and QUAIL RANCH
26 GOLF COURSE, LLC,

27 Defendants.
28

Case No. 2:15-cv-07425 RGK PLA

**NINETEENTH INTERIM
APPLICATION OF ALLEN
MATKINS LECK GAMBLE
MALLORY & NATSIS, LLP,
GENERAL COUNSEL TO THE
RECEIVER FOR PAYMENT OF
FEES AND REIMBURSEMENT OF
EXPENSES**

Date: December 7, 2020
Time: 9:00 a.m.
Ctrm.: 850
Judge: Hon. R. Gary Klausner

1 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"),
2 general counsel to Thomas A. Seaman ("Receiver"), the Court-appointed permanent
3 receiver for Defendants USFIA, Inc., Alliance Financial Group, Inc.,
4 Amauction, Inc., Aborell Mgmt I, LLC, Aborell Advisors I, LLC, Aborell
5 REIT II, LLC, Ahome Real Estate, LLC, Alliance NGN, Inc., Apollo REIT I, Inc.,
6 Apollo REIT II, LLC, Amkey, Inc., US China Consultation Association, Quail
7 Ranch Golf Course, LLC, and their subsidiaries and affiliates (collectively,
8 "Receivership Entities"), hereby submits this nineteenth interim application for
9 approval and payment of fees and reimbursement of expenses ("Application"). This
10 Application covers the period from April 1, 2020, through June 30, 2020
11 ("Nineteenth Application Period"), and seeks interim approval of \$9,947.25 in fees
12 and \$246.25 in expenses, and an order authorizing the Receiver to pay, on an
13 interim basis, 80% of fees incurred (\$7,957.80).

14 I. INTRODUCTION

15 This receivership involves a complex and wide ranging group of enterprises
16 and assets funded with the fruits of the fundraising scheme at the heart of the action
17 filed by the Securities and Exchange Commission ("Commission"). The Receiver
18 was appointed on a temporary basis on September 29, 2015, and on a permanent
19 basis on October 6, 2015.

20 The appointment orders confer broad duties, responsibilities, and powers on
21 the Receiver that are designed to allow him to secure, preserve, and protect the
22 assets of the Receivership Entities, investigate and recover sums transferred to third
23 parties, conduct a forensic accounting and analysis of the Receivership Entities'
24 financial transactions, review and analyze investor claims, and maximize the amount
25 ultimately available for distribution to investors. The appointment orders also
26 authorize the Receiver to engage counsel to assist him in the performance of his
27 duties. The Receiver promptly determined that experienced, qualified counsel was
28 critical due to the size and complexity of the receivership estate. Accordingly, the

1 Receiver engaged Allen Matkins to assist with urgent legal issues facing the
2 receivership estate and the firm immediately began work.

3 This fee application should be read in conjunction with the Receiver's
4 Twentieth Interim Report and Recommendations ("Twentieth Report") filed
5 concurrently with this application, which describes in detail the Receiver's activities
6 during the Nineteenth Application Period. Dkt. No. _____. This Application seeks
7 interim approval of \$9,947.25 in fees for a total of 13.70 hours worked, and payment
8 on an interim basis of 80% of that amount, or \$7,957.80. The work performed is
9 described task-by-task in Exhibit A and is broken down into the following
10 categories:

Matter	Hours	Amount
Asset Investigation & Recovery	2.00	\$1,575.00
Reporting	4.80	\$3,238.20
Claims	5.70	\$4,343.85
Distribution	0.40	\$315.00
Employment & Professional Services	0.80	\$475.20
TOTAL	13.70	\$9,947.25

17 Allen Matkins has worked diligently and efficiently to assist the Receiver
18 with urgent and ongoing legal issues and tasks facing the receivership estate. The
19 firm's work has allowed the Receiver to preserve and protect the substantial value of
20 receivership estate assets and to monetize the recovered non-cash assets, which has
21 resulted in the Receiver holding cash of approximately \$63.8 million (as of June 30,
22 2020). Accordingly, Allen Matkins should be compensated on an interim basis for
23 its work.

24 **II. SUMMARY OF TASKS PERFORMED AND COSTS INCURRED**

25 **A. Categories and Descriptions of Work**

26 **1. Asset Investigation & Recovery**

27 Allen Matkins' work in this category focused on assisting the Receiver with
28 ongoing efforts to recover assets, as well as the Receiver's forensic accounting

1 analysis and report. The reasonable and necessary fees for work in this category
2 total \$1,575.00.

3 **2. Reporting**

4 Allen Matkins' work in this category focused on assisting the Receiver in
5 preparing his Eighteenth Interim Report, which was filed on May 26, 2020.
6 Dkt. 420. The firm also worked on the Joint Status Report pursuant to the Court's
7 June 23, 2020 Minute Order. Dkt. 435. The reasonable and necessary fees for work
8 in this category total \$3,238.20.

9 **3. Claims**

10 The claims bar date has long since passed, however, the difficult work
11 concerning the processing of claims has been proceeding in earnest over this
12 quarter. As previously reported, the Receiver, with the assistance of counsel, is
13 continuing their efforts to validate the thousands of claims received from investors,
14 and to address the complex tax claims arising out of pre-receivership and post-
15 receivership transactions. The resolution of these tax claims is a condition
16 precedent to the distribution of the over \$65 million recovered by the Receiver.

17 During this period, Allen Matkins provided the Receiver with advice and
18 counsel concerning the verification of claims as well as the Receiver's efforts to
19 address the processing of incomplete and disputed claims. This process has been
20 complicated by the previously reported issues with overseas claimants, leaders and
21 aggregators of claims, incomplete information, and lack of record keeping by the
22 Receivership Entities.

23 To date, the Receiver has processed approximately 8,500 claims¹ have been
24 received with an estimated face value of \$134 million. Notwithstanding the bar date
25 extensions and related actions to reach more claimants (which resulted in more
26 claims being filed), it appears that the Receiver will likely not be able to locate all of
27

28 _____
¹ The figures reflect the claims statistics as of October 2020.

1 the claimants. As of October 1, 2020, the Receiver expects to recommend that the
2 Court allow an estimated \$80.4 million in claims and deny claims of \$53.7 million.

3 Allen Matkins and the Receiver have also been exploring the options for
4 making an interim distribution to those with allowed claims. However, it has
5 become evident that before that can occur, the issues with the IRS' tax claims must
6 be resolved. The reasonable and necessary fees for work in this category total
7 \$4,343.85.

8 **4. Distribution**

9 Allen Matkins' work in this category focused on issues specific to the
10 anticipated distributions to investors with allowed claims. The reasonable and
11 necessary fees for work in this category total \$315.00.

12 **5. Employment & Professional Services**

13 Although fee applications are a necessary component to federal equity
14 receivership matters like this one, neither the Receiver nor his professionals charge
15 for preparing their own detailed fee applications. Here, Allen Matkins assisted in
16 preparing the Receiver's Seventeenth Interim Fee Application. The reasonable and
17 necessary fees for work in this category total \$475.20.

18 **III. THE FEES AND COSTS ARE REASONABLE** 19 **AND SHOULD BE ALLOWED**

20 "As a general rule, the expenses and fees of a receivership are a charge upon
21 the property administered." *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994).
22 These expenses include the fees and expenses of this Receiver and his professionals,
23 including Allen Matkins. Decisions regarding the timing and amount of an award of
24 fees and costs to the Receiver and his Professionals are committed to the sound
25 discretion of the Court. *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992)
26 (rev'd in part on other grounds, 998 F.2d 922 (11th Cir. 1993)).
27
28

1 In allowing fees, a court should consider "the time, labor and skill required,
2 but not necessarily that actually expended, in the proper performance of the duties
3 imposed by the court upon the receiver[], the fair value of such time, labor and skill
4 measured by conservative business standards, the degree of activity, integrity and
5 dispatch with which the work is conducted and the result obtained." *United States v.*
6 *Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks
7 omitted). In practical terms, receiver and professional compensation thus ultimately
8 rests upon the result of an equitable, multi-factor balancing test involving the
9 "economy of administration, the burden that the estate may be able to bear, the
10 amount of time required, although not necessarily expended, and the overall value of
11 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F. 2d 232, 237 (3d Cir.
12 1970). Regardless of how this balancing test is formulated, no single factor is
13 determinative and "a reasonable fee is based [upon] all circumstances surrounding
14 the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.
15 Supp. 465, 480 (S.D. Tex. 1974).

16 As a preliminary matter, the TRO and PI Order confer on the Receiver
17 substantial duties and powers, including to conduct such investigation and discovery
18 as is necessary to locate and account for all receivership assets, take such action as is
19 necessary and appropriate to assume control over and preserve receivership assets,
20 and employ attorneys and others to investigate and, where appropriate, institute,
21 pursue, and prosecute all claims and causes of action of whatever kind and nature.
22 *See* TRO, Part XI; PI Order, Part XI.

23 The Receiver promptly determined that experienced, qualified counsel was
24 necessary due to the size and complexity of the receivership estate and engaged
25 Allen Matkins pursuant to the authority granted to him in the TRO and PI Order.
26 Allen Matkins immediately began work and has worked diligently and efficiently to
27 assist the Receiver in carrying out his Court-ordered duties. The firm has submitted
28

1 a detailed fee application which describes the nature of the services rendered, and
2 the identity and billing rate of each individual performing each task. See Exhibit A.

3 Allen Matkins has endeavored to staff matters as efficiently as possible while
4 remaining cognizant of the complexity of issues presented. The request for fees is
5 based on Allen Matkins' customary billing rates charged for comparable services
6 provided in other matters, less a 10% discount. In addition, Allen Matkins wrote off
7 and did not charge for 0.40 hours of work (\$237.60) during the Nineteenth
8 Application Period.

9 The work performed by Allen Matkins was essential to carrying out the
10 Receiver's Court-ordered duties. Allen Matkins has worked diligently to preserve
11 and protect the assets of the receivership estate, investigate and recover sums
12 transferred to third parties, and maximize the funds available for ultimate
13 distribution to investors. Moreover, Allen Matkins seeks payment of only 80% of
14 fees incurred on an interim basis in recognition of the fact that its work in assisting
15 the Receiver is ongoing. Payment of the proposed 20% holdback will be sought at
16 the conclusion of the receivership. Allen Matkins' fees are fair and reasonable and
17 should be approved and paid on an interim basis.

18 IV. CONCLUSION

19 Allen Matkins, therefore, respectfully requests the Court enter an Order:

- 20 1. Approving Allen Matkins' fees, on an interim basis, of \$9,947.25;
- 21 2. Authorizing and directing the Receiver to pay 80% of approved fees, or
22 \$7,957.80, from the assets of the Receivership Entities;
- 23 3. Approving Allen Matkins' costs in the amount of \$254.62, and
24 authorizing and directing the Receiver to reimburse such costs in full; and

25
26
27
28

1 4. For such other and further relief as the Court deems appropriate.
2

3 Dated: November 9, 2020

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/ Edward G. Fates

EDWARD G. FATES
Attorneys for Receiver
THOMAS A. SEAMAN

4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

}
 10/29/20 09:04:10 PROFORMA STATEMENT FOR MATTER 375323.00003 (Thomas A. Seaman, Receiver for US Fine I) (Asset Investigation & Recovery)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David Matter #: 375323.00003 Client Name: Thomas A. Seaman, Receiver for US Fine I
 Date of Last Billing: 09/23/20 Matter Name: Asset Investigation & Recovery
 Proforma Number: 1058700
 Client/Matter Joint Group # 375323-1

Fees for Matter 375323.00003.(Asset Investigation & Recovery)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/08/20	8091926	Several calls/emails with Receiver and counsel concerning the report, tax issues, IRS negotiations (.4). Revise/review of the draft of Receiver's report, review documents, further revisions to address tax issues (.8).	Zaro, David	1.20	945.00	945.00	WO	HD	TR	_____
06/16/20	8125461	Research/analysis of USFIA, Ontario, CA business activity and further review of the Zettell letter/contract (.4). Call with Receiver related to further investigation of overseas and Canadian accounts (.2).	Zaro, David	0.60	472.50	1,417.50	WO	HD	TR	_____
06/24/20	8131639	Calls with Receiver and Ms. Juroe concerning the Zettle Canadian asset recovery proposal.	Zaro, David	0.20	157.50	1,575.00	WO	HD	TR	_____

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	2.00	787.50	1,575.00
		2.00		\$1,575.00
Subtotal Fees				\$1,575.00
Discount				0.00

10/29/20 09:04:10 PROFORMA STATEMENT FOR MATTER 375323.00003 (Thomas A. Seaman, Receiver for US Fine I) (Asset Investigation & Recovery)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
Total Fees				1,575.00
Total Disbursements				0.00

Attorney Billing Instructions

()	BILL ALL	()	Hold
()	BILL FEES ONLY	()	Write Off
()	BILL COST ONLY	()	Transfer All

Billing Instructions

expires 12/31/2020: 10% off standard rates (automatic); no text editing; copies @ .15

Account Summary – As Of 10/29/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	21,749.40	21,749.40	0.00	26,195.85	26,195.85	0.00	1,575.00	1,575.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	2,869.02	2,869.02	0.00
Billed	2,871.45	2,871.45	0.00	8,149.81	7,820.55	329.26	370,576.62	370,576.62	351.76
Collected	2,871.45	2,871.45	0.00	8,149.81	7,820.55	329.26	370,928.38	370,576.62	351.76
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	23,324.40	23,324.40	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Thomas A. Seaman, Receiver for US Fine Investment Arts Inc

}

10/29/20 09:04:11 PROFORMA STATEMENT FOR MATTER 375323.00004 (Thomas A. Seaman, Receiver for US Fine I) (Reporting)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David
 Date of Last Billing: 09/23/20
 Proforma Number: 1058700

Matter #: 375323.00004

Client Name: Thomas A. Seaman, Receiver for US Fine I
 Matter Name: Reporting

Client/Matter Joint Group # 375323-1

Fees for Matter 375323.00004.(Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/02/20	8053667	Communications with Receiver re: preparation of interim report for fourth quarter	Fates, Edward (Ted)	0.30	178.20	178.20	WO	HD	TR	_____
04/02/20	8055412	Call with Receiver and review/evaluate draft of the report and advice to counsel (.3).	Zaro, David	0.30	236.25	414.45	WO	HD	TR	_____
05/08/20	8088895	Work on Receiver's 18th interim report	Fates, Edward (Ted)	1.20	712.80	1,127.25	WO	HD	TR	_____
05/11/20	8092164	Evaluate draft Receiver's report concerning the claims issues.	Zaro, David	0.30	236.25	1,363.50	WO	HD	TR	_____
05/15/20	8094885	Meet and confer communications with SEC counsel re: Receiver's 18th interim report	Fates, Edward (Ted)	0.20	118.80	1,482.30	WO	HD	TR	_____
05/26/20	8102992	Finalize Receiver's 18th interim report	Fates, Edward (Ted)	0.30	178.20	1,660.50	WO	HD	TR	_____
05/26/20	8108064	Evaluate, revise, advice concerning the Receiver's final draft of the report to court and recommendations (.3). Review of the letters from tax accountants and assess	Zaro, David	0.70	551.25	2,211.75	WO	HD	TR	_____

10/29/20 09:04:11 PROFORMA STATEMENT FOR MATTER 375323.00004 (Thomas A. Seaman, Receiver for US Fine I) (Reporting)

Fees for Matter 375323.00004.(Reporting)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		indemnity issues, email to Receiver (.4).						
06/23/20	8129292	Email to Receiver/counsel regarding court order related to order concerning joint report.	Zaro, David	0.20	157.50	2,369.25	WO	HD TR
06/24/20	8131638	Call with Receiver and Ms. Juroe concerning the joint report (.2).	Zaro, David	0.20	157.50	2,526.75	WO	HD TR
06/25/20	8130098	Analyze order re: submission of joint status report and plan for report, communications with Receiver re: same (.6) call with SEC counsel re: joint report and plan for judgment as to entities in receivership (.2)	Fates, Edward (Ted)	0.80	475.20	3,001.95	WO	HD TR
06/25/20	8131657	Calls with Receiver related to Receiver report, joint and consent judgments.	Zaro, David	0.30	236.25	3,238.20	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	2.00	787.50	1,575.00
001665	Fates, Edward (Ted)	2.80	594.00	1,663.20
		4.80		\$3,238.20
Subtotal Fees				\$3,238.20
Discount				0.00
Total Fees				3,238.20
Total Disbursements				0.00

Attorney Billing Instructions

- | | |
|--------------------|------------------|
| () BILL ALL | () Hold |
| () BILL FEES ONLY | () Write Off |
| () BILL COST ONLY | () Transfer All |

10/29/20 09:04:11 PROFORMA STATEMENT FOR MATTER 375323.00004 (Thomas A. Seaman, Receiver for US Fine I) (Reporting)

Billing Instructions

expires 12/31/2020: 10% off standard rates (automatic); no text editing; copies @ .15

Account Summary – As Of 10/29/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	5,634.45	5,634.45	0.00	13,151.25	13,151.25	0.00	3,238.20	3,238.20	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	1,812.03	1,812.03	0.00
Billed	9,720.27	9,720.27	0.00	11,676.42	11,676.42	0.00	57,771.72	57,771.72	0.00
Collected	9,720.27	9,720.27	0.00	11,676.42	11,676.42	0.00	57,771.72	57,771.72	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	8,872.65	8,872.65	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Thomas A. Seaman, Receiver for US Fine Investment Arts Inc

}
 10/29/20 09:04:13 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David Matter #: 375323.00008 Client Name: Thomas A. Seaman, Receiver for US Fine I
 Date of Last Billing: 09/23/20 Matter Name: Claims
 Proforma Number: 1058700
 Client/Matter Joint Group # 375323-1

Fees for Matter 375323.00008.(Claims)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/02/20	8055415	Call with Receiver related to the USFIA claims process and follow-up thereon as to timing/issues (.2).	Zaro, David	0.20	157.50	157.50	WO	HD	TR	_____
04/17/20	8069003	Call/email related to Receiver ttax claims, the status of tax analysis, the IRS response, possible substitute tax attorney/CPA (.5). Call with claimant and counsel related to the progress and status (.4).	Zaro, David	0.90	708.75	866.25	WO	HD	TR	_____
04/28/20	8077506	Review supplemental tax assessments and review and respond to inquiry from Receiver's staff re: the same (0.4).	Hsu, Tim	0.40	208.80	1,075.05	WO	HD	TR	_____
05/07/20	8089286	Emails with Receiver related to the claims process, results, next steps, IRS claim subordination.	Zaro, David	0.30	236.25	1,311.30	WO	HD	TR	_____
05/12/20	8092646	Evaluate the status of the work on the issues related to the claims and timing of the process, remaining issues.	Zaro, David	0.40	315.00	1,626.30	WO	HD	TR	_____
05/13/20	8093924	Email/conference with regard to the IRS tax status, impact upon the claim and	Zaro, David	0.60	472.50	2,098.80	WO	HD	TR	_____

10/29/20 09:04:13 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Fees for Matter 375323.00008.(Claims)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
05/15/20	8096457	distribution process. Call with counsel as to timing of claims allowance motion and communications with investors (.2).	Zaro, David	0.20	157.50	2,256.30	WO	HD	TR	_____
05/21/20	8101346	Call with investor related to claims issues and process (.2). Further call with counsel and Receiver office concerning the claims process and advice related to the next steps (.4)	Zaro, David	0.60	472.50	2,728.80	WO	HD	TR	_____
05/26/20	8108034	Email to/from overseas investors and assess the status, respond as to the Receiver's progress and obstacles (.4).	Zaro, David	0.40	315.00	3,043.80	WO	HD	TR	_____
05/27/20	8107121	Call with the Receiver related to claims issues, pending dispute, open claims (.3). Review investor claimant call and follow-up with counsel related to the claims (.3).	Zaro, David	0.60	472.50	3,516.30	WO	HD	TR	_____
06/08/20	8117171	Several emails concerning investor and leader claims.	Zaro, David	0.40	315.00	3,831.30	WO	HD	TR	_____
06/09/20	8118928	Follow-up on claimant call related to status of claims process/timing (.2).	Zaro, David	0.20	157.50	3,988.80	WO	HD	TR	_____
06/11/20	8120996	Follow-up with investor claimant related to the claims process, timing, and email regarding same issues.	Zaro, David	0.30	236.25	4,225.05	WO	HD	TR	_____
06/17/20	8123800	Communications with Receiver re: tax documents and contact information for S. Chen	Fates, Edward (Ted)	0.20	118.80	4,343.85	WO	HD	TR	_____

10/29/20 09:04:13 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	5.10	787.50	4,016.25
001665	Fates, Edward (Ted)	0.20	594.00	118.80
002055	Hsu, Tim	0.40	522.00	208.80
		5.70		\$4,343.85
Subtotal Fees				\$4,343.85
Discount				0.00
Total Fees				4,343.85
Total Disbursements				0.00

Attorney Billing Instructions

() BILL ALL	() Hold
() BILL FEES ONLY	() Write Off
() BILL COST ONLY	() Transfer All

Billing Instructions

expires 12/31/2020: 10% off standard rates (automatic); no text editing; copies @ .15

Account Summary – As Of 10/29/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	34,024.95	34,024.95	0.00	40,888.80	40,888.80	0.00	4,343.85	4,343.85	0.00
Unbilled Adj	0.00	0.00	0.00	1.35	1.35	0.00	1,261.35	1,261.35	0.00
Billed	6,775.20	6,775.20	0.00	11,621.70	11,621.70	0.00	125,499.06	125,499.06	0.00
Collected	6,775.20	6,775.20	0.00	11,621.70	11,621.70	0.00	125,499.06	125,499.06	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
WIP	38,368.80	38,368.80	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

10/29/20 09:04:13 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

Billing Address

Thomas A. Seaman, Receiver for US Fine Investment Arts Inc

}
 10/29/20 09:04:15 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David Matter #: 375323.00010 Client Name: Thomas A. Seaman, Receiver for US Fine I
 Date of Last Billing: 11/13/19 Matter Name: Distribution
 Proforma Number: 1058700
 Client/Matter Joint Group # 375323-1

Fees for Matter 375323.00010.(Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
06/25/20	8131655	Conference with Receiver related to bifurcation of distributions and claims, follow-up with counsel.	Zaro, David	0.40	315.00	315.00	WO	HD TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	0.40	787.50	315.00
Subtotal Fees				\$315.00
Discount				0.00
Total Fees				315.00
Total Disbursements				0.00

Attorney Billing Instructions

- BILL ALL
- BILL FEES ONLY
- BILL COST ONLY
- Hold
- Write Off
- Transfer All

Billing Instructions

expires 12/31/2020: 10% off standard rates (automatic); no text editing; copies @ .15

10/29/20 09:04:15 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

Account Summary – As Of 10/29/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	644.40	644.40	0.00	959.40	959.40	0.00	315.00	315.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	0.00	0.00	0.00	0.00	0.00	0.00	2,516.40	2,516.40	0.00
Collected	0.00	0.00	0.00	0.00	0.00	0.00	2,516.40	2,516.40	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	959.40	959.40	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Thomas A. Seaman, Receiver for US Fine Investment Arts Inc

}

10/29/20 09:04:17 PROFORMA STATEMENT FOR MATTER 375323.00011 (Thomas A. Seaman, Receiver for US Fine I) (Employment & Professional Services)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David
 Date of Last Billing: 09/23/20
 Proforma Number: 1058700

Matter #: 375323.00011

Client Name: Thomas A. Seaman, Receiver for US Fine I
 Matter Name: Employment & Professional Services

Client/Matter Joint Group # 375323-1

Fees for Matter 375323.00011.(Employment & Professional Services)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action	
05/08/20	8089087	Revisions to Receiver's 17th fee application	Fates, Edward (Ted)	0.40	237.60	237.60	WO	HD	TR
05/13/20	8092954	Discuss issues with Crowe fee application and timing with Receiver	Fates, Edward (Ted)	0.20	118.80	356.40	WO	HD	TR
05/15/20	8094688	Address issues re: Crowe fee application, discuss same with Receiver	Fates, Edward (Ted)	0.20	118.80	475.20	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	0.80	594.00	475.20
		0.80		\$475.20
	Subtotal Fees			\$475.20
	Discount			0.00
	Total Fees			475.20
	Total Disbursements			0.00

Attorney Billing Instructions

10/29/20 09:04:17 PROFORMA STATEMENT FOR MATTER 375323.00011 (Thomas A. Seaman, Receiver for US Fine I) (Employment & Professional Services)

()	BILL ALL	()	Hold
()	BILL FEES ONLY	()	Write Off
()	BILL COST ONLY	()	Transfer All

Billing Instructions

expires 12/31/2020: 10% off standard rates (automatic); no text editing; copies @ .15

Account Summary – As Of 10/29/20

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	979.20	979.20	0.00	2,838.60	2,838.60	0.00	475.20	475.20	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	1,384.20	1,384.20	0.00	1,800.00	1,800.00	0.00	17,954.10	17,954.10	0.00
Collected	1,384.20	1,384.20	0.00	1,800.00	1,800.00	0.00	17,954.10	17,954.10	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	1,663.20	1,663.20	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

Thomas A. Seaman, Receiver for US Fine Investment Arts Inc