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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  
24 NGN, INC., APOLLO REIT I, INC.,  
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

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

Date: November 15, 2021  
Time: 9:00 a.m.  
Ctrm.: 850  
Judge: Hon. R. Gary Klausner

1 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), general  
2 counsel to Thomas A. Seaman ("Receiver"), the Court-appointed permanent receiver  
3 for Defendants USFIA, Inc., Alliance Financial Group, Inc., Amauction, Inc.,  
4 Aborell Mgmt. I, LLC, Aborell Advisors I, LLC, Aborell REIT II, LLC, Ahome Real  
5 Estate, LLC, Alliance NGN, Inc., Apollo REIT I, Inc., Apollo REIT II, LLC,  
6 Amkey, Inc., US China Consultation Association, Quail Ranch Golf Course, LLC,  
7 and their subsidiaries and affiliates (collectively, "Receivership Entities"), hereby  
8 submits this twenty-second interim application for approval and payment of fees and  
9 reimbursement of expenses ("Application"). This Application covers the period from  
10 January 1, 2021, through June 30, 2021 ("Twenty-Second Application Period"), and  
11 seeks interim approval of \$59,179.50 in fees and \$295.40 in expenses, and an order  
12 authorizing the Receiver to pay, on an interim basis, 80% of fees incurred  
13 (\$47,343.60) and 100% of the costs (\$295.40).

## 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 assets  
22 of the Receivership Entities, investigate and recover sums transferred to third parties,  
23 conduct a forensic accounting and analysis of the Receivership Entities' financial  
24 transactions, review and analyze investor claims, and maximize the amount  
25 ultimately available for distribution to investors. The appointment orders authorized  
26 the Receiver to engage counsel to assist him in the performance of his duties. The  
27 Receiver determined that experienced, qualified counsel was critical due to the size  
28

1 and complexity of the receivership estate. Accordingly, the Receiver engaged Allen  
2 Matkins to assist with ongoing legal issues facing the receivership estate.

3 This fee application should be read in conjunction with the Receiver's Twenty-  
4 Second and Twenty-Third Interim Reports, which describe in detail the Receiver's  
5 activities during the Twenty-Second Application Period. Dkt. Nos. 459, 469. This  
6 Application seeks interim approval of \$59,179.50 in fees for a total of 77.40 hours  
7 worked, and payment on an interim basis of 80% of that amount, or \$47,343.60. The  
8 work performed is described task-by-task in Exhibit A and is broken down into the  
9 following categories:

Matter	Hours	Amount
Asset Investigation & Recovery	12.80	\$10,063.80
Reporting	7.00	\$4,999.95
Pending Litigation	5.40	\$2,455.65
Claims	39.20	\$31,401.45
Distribution	5.10	\$4,108.05
Employment & Professional Services	7.90	\$6,150.60
TOTAL	77.40	\$59,179.50

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17 Allen Matkins has worked diligently and efficiently to assist the Receiver with  
18 the remaining legal issues and tasks facing the receivership estate. The firm's work  
19 has allowed the Receiver to recover, 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 recovering approximately gross receipts of \$77 million. The  
22 Receiver is presently holding \$64 million (as of June 30, 2021). Accordingly, Allen  
23 Matkins should be compensated on an interim basis for its work.

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

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

26 **1. Asset Investigation & Recovery**

27 During January and February 2020, Allen Matkins continued its work to  
28 recover "unclaimed assets," deposits held by third parties, and credit card holdbacks.

1 The Receiver and Allen Matkins were contacted by several third parties alleging that  
2 they had specific knowledge with regard to the existence of accounts with banks and  
3 credit card processors which were holding funds owned by Receivership Entities.  
4 Allen Matkins worked with the Receiver and these potential finders to investigate  
5 these claims. The investigation of the so-called finder's claims was not successful  
6 and no assets were identified based upon their leads.

7 Allen Matkins and the Receiver independently identified certain credit card  
8 deposits and holdbacks, held for the benefit of the Receivership Entities. These  
9 holdbacks/credit card accounts contained over \$2.0 million. In one case, Allen  
10 Matkins worked with Complete Merchant Solutions ("CMS") to resolve disputes  
11 over the rights to funds on deposit with CMS. Allen Matkins negotiated for the  
12 recovery of \$1,500,000 from the CMS accounts. The reasonable and necessary fees  
13 for work in this category total \$10,063.80.

## 14 **2. Reporting**

15 Allen Matkins' work in this category focused on assisting the Receiver in  
16 preparing Interim Reports. This work included drafting portions of the report,  
17 communications with the SEC and AUSA, and addressing timing issues related to  
18 taxes. The reasonable and necessary fees for work in this category total \$4,999.95.

## 19 **3. Pending Litigation**

20 Allen Matkins' work in this category relates to the pending state court  
21 litigation matters brought by investors against the Receivership Entities. Once the  
22 below described claims and distribution process has been concluded, these actions  
23 will likely become moot and the Receiver anticipates the cases will be dismissed.  
24 The reasonable and necessary fees for work in this category total \$2,455.65.

## 25 **4. Claims**

26 During this period, Allen Matkins worked with the Receiver to make the final  
27 determination as to the allowed and disallowed claims and to formulate the plan for  
28 distribution to those with allowed claims. This work is described in detail in the

1 attached invoices and the Receiver's Reply and Response to Disputes Concerning  
2 Motion to Approve: (1) Receiver's recommendations as to allowed claims;  
3 (2) Receiver's recommendations as to disputed claims; (3) Authorization to limit  
4 scope of receivership; and (4) Distribution Plan ("Reply") [Dkt. No. 448]. As  
5 reflected therein, there were over 8500 claims with a face value of \$135 million. Of  
6 these claims, the Receiver requested that the Court grant the Receiver's motion to  
7 allow claims totaling approximately \$80 million and deny claims totaling  
8 approximately \$54 million.

9       After the filing of the Claims Motion in December 2020, the Receiver became  
10 aware of a significant number of new and corrected claims along with a few  
11 objections. The Receiver sought advice and counsel from Allen Matkins in  
12 connection with the verification of claims as well as the Receiver's efforts to address  
13 the processing of incomplete and disputed claims. With Allen Matkins' assistance,  
14 the Receiver was able to address the new claims, corrected claims and disputed  
15 claims without the need of extensive litigation or briefing. The claims process  
16 concluded with the filing of an amended order allowing and disallowing claims  
17 which the Court approved on February 18, 2021 [Dkt. No. 455].

18       Allen Matkins also continued to work with the Receiver and tax accountants to  
19 address the numerous complex tax issues and claims by the Internal Revenue Service  
20 ("IRS") and California Franchise Tax Board ("FTB"), arising out of pre-receivership  
21 and post-receivership transactions. The resolution of these tax claims is a condition  
22 precedent to Receiver's distribution to investors and creditors of the over \$65 million  
23 recovered by the Receiver pursuant to the Receiver's proposed Distribution Plan [Dkt  
24 No. 444-7].

25       As previously reported to this Court, most recently in the Allen Matkins'  
26 Response to OSC Re: Allen Matkins Twenty-First Application for Fees and  
27 Expenses, the timing of the IRS's review of the tax returns and the resolution of any  
28 disputes arising out of such review, if any, will determine the timing of the

1 Receiver's distribution to investors (as previously reported, given the significant  
2 amounts at issue with regard to potential tax liability, it would be imprudent for the  
3 Receiver to make even a partial distribution.) Allen Matkins has been engaged in  
4 significant research and analysis as to the appropriate tax treatment of investor  
5 contributions and the Receivership Entities' revenue and income during the pre and  
6 post receivership tax periods; procedures to expedite the review of tax returns; and  
7 the prospects for subordinating the claims of the IRS and the FTB. In addition, Allen  
8 Matkins investigated and analyzed tax issues and prospective claims arising out of  
9 overseas interests and transactions with affiliates.

10 With all of the tax returns on file, Allen Matkins and the Receiver have been  
11 working on efforts to obtain "Prompt Determination" by the IRS. As of the date of  
12 this filing, we still have no answer from the IRS but we continue to pursue every  
13 available avenue and opportunity to gain the IRS' cooperation.

14 The reasonable and necessary fees for work in this category total \$31,401.45.

15 **5. Distribution**

16 Allen Matkins' work in this category focused on issues specific to the  
17 anticipated distributions to investors with allowed claims. As discussed above, much  
18 of Allen Matkins' work involved addressing the unique tax issues and developing a  
19 plan of distribution which would allow for the maximum distribution to investors.  
20 The reasonable and necessary fees for work in this category total \$4,108.05.

21 **6. Employment & Professional Services**

22 Although fee applications are a necessary component to federal equity  
23 receivership matters like this one, neither the Receiver nor his professionals charge  
24 for preparing their own detailed fee applications. Here, Allen Matkins assisted in  
25 preparing the Receiver's Twenty-Second Interim Fee Application. The reasonable  
26 and necessary fees for work in this category total \$6,150.60.

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**B. Summary of Expenses Requested for Reimbursement**

Allen Matkins requests the Court approve reimbursement of \$295.40 in out-of-pocket costs. The itemization of such expenses is summarized below by category.

<b>Category</b>	<b>Total</b>
PACER/Document Research	\$33.40
Court/Filing Fees	\$130.05
Messenger/FedEx Fees	\$86.95
Telephonic Appearance	\$45.00
<b>TOTAL</b>	<b>\$ 295.40</b>

**C. Allen Matkins' Fees Over Time and Future Fees**

As reported to the Court with regard to the OSC Response, the amount of Allen Matkins' fees have continued to decline following the completion of the Claims process. As reflected in the below chart, following the conclusion of the Claims process, Allen Matkins' fees decreased to the approximately \$9,000 – \$10,000 per quarter (or \$3,000 per month), which amount was previously incurred in handling the ongoing operations of the Receivership Entity during earlier periods. It should be noted that Allen Matkins' fees may increase a bit during the next two quarters depending upon the amount of work involved in addressing the IRS issues.

<b><u>Period of Time</u></b>	<b><u>Fees</u></b>
April 1, 2020 – June 2020	\$9,947.00
July 2020 – September 2020	\$64,217.00
October 2020 – December 2020	\$75,980.00
January 2021 – March 2021	\$48,159.00
April 2021 – June 2021	\$9,234.00



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

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

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

As a preliminary matter, the PI Order conferred on the Receiver substantial duties and powers, including to conduct such investigation and discovery as is necessary to locate and account for all receivership assets, take such action as is necessary and appropriate to assume control over and preserve receivership assets,



1 and employ attorneys and others to investigate and, where appropriate, institute,  
2 pursue, and prosecute all claims and causes of action of whatever kind and nature.  
3 *See* TRO, Part XI; PI Order, Part XI.

4 As previously reported, the Receiver determined that experienced, qualified  
5 counsel was necessary due to the size and complexity of the receivership estate and  
6 engaged Allen Matkins pursuant to the authority granted to him. Allen Matkins has  
7 submitted a detailed fee application which describes the nature of the services  
8 rendered, and the identity and billing rate of each individual performing each task.  
9 *See* Exhibit A.

10 Allen Matkins has endeavored to staff matters as efficiently as possible while  
11 remaining cognizant of the complexity of issues presented. The request for fees is  
12 based on Allen Matkins' customary billing rates charged for comparable services  
13 provided in other matters, less a 10% discount. In addition, Allen Matkins wrote off  
14 and did not charge for 1.0 hour of work (\$612.00) during the Twenty-Second  
15 Application Period.

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

#### 25 IV. CONCLUSION

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

- 27 1. Approving Allen Matkins' fees, on an interim basis, of \$59,179.50;  
28

1           2.     Authorizing and directing the Receiver to pay 80% of approved fees, or  
2 \$47,343.60, from the assets of the Receivership Entities;

3           3.     Approving Allen Matkins' costs in the amount of \$295.40, and  
4 authorizing and directing the Receiver to reimburse such costs in full; and

5           4.     For such other and further relief as the Court deems appropriate.  
6

7 Dated: October 14, 2021

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

8  
9 By:           /s/ Edward G. Fates

10 EDWARD G. FATES  
11 Attorneys for Receiver  
12 THOMAS A. SEAMAN  
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# **EXHIBIT A**

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08/05/21 14:31:50 PROFORMA STATEMENT FOR MATTER 375323.00002 (Thomas A. Seaman, Receiver for US Fine I) (General Receivership)

**Preliminary Billing Form**

Billing Atty: 000313 - Zaro, David  
 Date of Last Billing: 07/20/21  
 Proforma Number: 1108745

Matter #: 375323.00002

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

Client/Matter Joint Group # 375323-1

**Disbursements for Matter 375323.00002 (General Receivership)**

Trans Date	Index	Type	Quantity	Amt				
02/10/21	2701746	DCSRCH – Document Search - - PACER - 10/20 -12/20 Usage	0.00	14.00	WO	HD	TR	_____
05/10/21	2719154	DCSRCH – Document Search - - PACER - 1/21 -3/21 Usage	0.00	10.80	WO	HD	TR	_____
05/10/21	2719155	DCSRCH – Document Search - - PACER - 1/21 -3/21 Usage	0.00	8.60	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
		0.00		\$0.00
	Subtotal Fees			\$0.00
	Discount			0.00
	Total Fees			0.00
	Total Disbursements			33.40

**Attorney Billing Instructions**

- |   |                                       |
|---|---------------------------------------|
| <input type="checkbox"/> BILL ALL       | <input type="checkbox"/> Hold         |
| <input type="checkbox"/> BILL FEES ONLY | <input type="checkbox"/> Write Off    |
| <input type="checkbox"/> BILL COST ONLY | <input type="checkbox"/> Transfer All |

**Billing Instructions**

expires 12/31/2021: 10% off standard rates (automatic); no text editing; copies @ .15

08/05/21 14:31:50 PROFORMA STATEMENT FOR MATTER 375323.00002 (Thomas A. Seaman, Receiver for US Fine I) (General Receivership)

**Account Summary – As Of 08/05/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	5,226.40	3,052.80	2,173.60	3,208.60	3,175.20	33.40	33.40	0.00	33.40
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	616.17	67.77	548.40
Billed	3,015.30	3,014.55	0.75	3,015.30	3,014.55	0.75	152,777.97	152,777.97	33,614.12
Collected	3,015.30	3,014.55	0.75	3,015.30	3,014.55	0.75	186,392.09	152,777.97	33,614.12
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>3,577.60</b>	<b>3,175.20</b>	<b>402.40</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

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**Billing Address**

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

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08/05/21 14:31:51 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: 07/20/21

Matter Name: Asset Investigation & Recovery

Proforma Number: 1108745

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		
01/06/21	8333375	Review prior settlement terms with M.Shu and provide update and response to client inquiry re: the same.	Hsu, Tim	0.50	272.25	272.25	WO	HD	TR	_____
01/08/21	8316015	Analysis of Receiver claims to CMS deposit sums and emails with Receiver and CMS counsel (.4). Call with CMS counsel, follow-up with the Receiver as to CMS clams (.4).	Zaro, David	0.80	644.40	916.65	WO	HD	TR	_____
01/11/21	8318152	Review email memo from counsel for CMS counsel and evaluate the CMS contract, FTC complaint, assess claims (1.1). Call with the Receiver related to the CMS claims/recovery (.3).	Zaro, David	1.40	1,127.70	2,044.35	WO	HD	TR	_____
01/11/21	8318154	Email from AUSA and review Chen sentencing memoranda, follow-up with Receiver regarding same.	Zaro, David	0.30	241.65	2,286.00	WO	HD	TR	_____
01/12/21	8318860	Call with Receiver and counsel as to CMS/transfers charge-backs/FTC action, recovery issues (.4). Research concerning the contract rights of CMS as to the card processor and indemnity claims (.9).	Zaro, David	1.30	1,047.15	3,333.15	WO	HD	TR	_____

08/05/21 14:31:51 PROFORMA STATEMENT FOR MATTER 375323.00003 (Thomas A. Seaman, Receiver for US Fine I) (Asset Investigation & Recovery)

**Fees for Matter 375323.00003.(Asset Investigation & Recovery)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/18/21	8325413	Evaluate contracts and documents to prepare for call with counsel for CMS as to turnover of funds (.4). Call with counsel for CMS related to credit card funds.	Zaro, David	0.80	644.40	3,977.55	WO	HD	TR	_____
01/28/21	8337441	Evaluate settlement approach and follow-up on CMS claim with the Receiver and address the response to the settlement offer.	Zaro, David	0.40	322.20	4,299.75	WO	HD	TR	_____
02/01/21	8340028	Evaluate the draft report and accounting, revise draft report (1.1). Email to counsel and email to Receiver concerning the report (.3).	Zaro, David	1.40	1,127.70	5,427.45	WO	HD	TR	_____
02/08/21	8344786	Several conferences with counsel, prepare for meeting with CMS credit card depositors (.4). Call with CMS counsel as to the settlement of claim (.7).	Zaro, David	1.10	886.05	6,313.50	WO	HD	TR	_____
02/10/21	8348433	Evaluate the approach and cost, benefit of strategy to recover outstanding deposits/reserves from credit card processor, follow-up on settlement.	Zaro, David	0.40	322.20	6,635.70	WO	HD	TR	_____
02/11/21	8347682	Communications with A. Juroe re: issues relating to funds in Chen personal accounts	Fates, Edward (Ted)	0.20	122.40	6,758.10	WO	HD	TR	_____
02/11/21	8348504	Research/analysis, assess prospects and procedural issues related to pursuit of CMS and follow-up (.7). Call with counsel and the Receiver related to the CMS deposit (.2).	Zaro, David	0.90	724.95	7,483.05	WO	HD	TR	_____



08/05/21 14:31:51 PROFORMA STATEMENT FOR MATTER 375323.00003 (Thomas A. Seaman, Receiver for US Fine I) (Asset Investigation & Recovery)

**Fees for Matter 375323.00003.(Asset Investigation & Recovery)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
02/12/21	8353482	Analysis of offer from CMS regarding settlement, email, communications with counsel for CMS and Receiver as to recovery of reserve (.4). Several emails/calls related to settlement offer and follow-up regarding same (.4).	Zaro, David	0.80	644.40	8,127.45	WO	HD	TR	_____
02/17/21	8351707	Communications with A. Juroe re: potential recovery of funds in Chen personal accounts	Fates, Edward (Ted)	0.20	122.40	8,249.85	WO	HD	TR	_____
02/17/21	8356080	Emails with counsel for CMS related to settlement of deposit/reserve claims and dispute/settlement (.6). Email/call with the Receiver and Ms. Juroe related to recovery of CMS funds (.5).	Zaro, David	1.10	886.05	9,135.90	WO	HD	TR	_____
02/18/21	8354627	Emails/follow-up on the CMS wire transfer issues and follow-up with counsel and Receiver concerning settlement recovery.	Zaro, David	0.40	322.20	9,458.10	WO	HD	TR	_____
02/22/21	8356408	Communications with T. McDonnell re: disgorgement order and recovery of balances in Chen accounts	Fates, Edward (Ted)	0.20	122.40	9,580.50	WO	HD	TR	_____
03/30/21	8397396	Follow-up with the Receiver counsel, then call with SEC counsel as to SFAR and case status (.2).	Zaro, David	0.20	161.10	9,741.60	WO	HD	TR	_____
06/23/21	8486122	Review of the further investigation and recovery of unclaimed assets, call with Receiver, follow-up on the recovery of further credit card deposits and pending turnover demands.	Zaro, David	0.40	322.20	10,063.80	WO	HD	TR	_____

08/05/21 14:31:51 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
000313	Zaro, David	11.70	805.50	9,424.35
001665	Fates, Edward (Ted)	0.60	612.00	367.20
002055	Hsu, Tim	0.50	544.50	272.25
		12.80		\$10,063.80
Subtotal Fees				\$10,063.80
Discount				0.00
Total Fees				10,063.80
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 12/31/2021: 10% off standard rates (automatic); no text editing; copies @ .15

**Account Summary – As Of 08/05/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,757.70	1,757.70	0.00	12,488.40	12,488.40	0.00	10,063.80	10,063.80	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	5,285.52	5,285.52	0.00
Billed	12,046.95	12,046.95	0.00	28,787.25	28,730.25	57.00	400,881.87	400,881.87	408.76
Collected	12,046.95	12,046.95	0.00	28,787.25	28,730.25	57.00	401,290.63	400,881.87	408.76
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>12,488.40</b>	<b>12,488.40</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

08/05/21 14:31:51 PROFORMA STATEMENT FOR MATTER 375323.00003 (Thomas A. Seaman, Receiver for US Fine I) (Asset Investigation & Recovery)

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**Billing Address**

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

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08/05/21 14:31:53 PROFORMA STATEMENT FOR MATTER 375323.00004 (Thomas A. Seaman, Receiver for US Fine I) (Reporting)

**Preliminary Billing Form**

Billing Atty: 000313 - Zaro, David      Matter #: 375323.00004      Client Name: Thomas A. Seaman, Receiver for US Fine I  
 Date of Last Billing: 07/20/21      Matter Name: Reporting  
 Proforma Number: 1108745  
 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		
01/19/21	8323078	Communications with Receiver re: 21st interim report	Fates, Edward (Ted)	0.20	122.40	122.40	WO	HD	TR	_____
01/25/21	8327758	Revisions to Receiver's 21st interim report	Fates, Edward (Ted)	0.70	428.40	550.80	WO	HD	TR	_____
01/28/21	8337432	Continued work on the Receiver's draft report.	Zaro, David	0.80	644.40	1,195.20	WO	HD	TR	_____
02/02/21	8350113	Email/calls to counsel and Receiver related to the Receiver Report and Accounting.	Zaro, David	0.30	241.65	1,436.85	WO	HD	TR	_____
02/05/21	8342050	Meet and confer communications with SEC counsel re: 21st interim report (.2) finalize same (.2)	Fates, Edward (Ted)	0.40	244.80	1,681.65	WO	HD	TR	_____
03/30/21	8529655	Follow-up with the Receiver as to USFIA timing to taxes and closure (.2).	Zaro, David	0.20	161.10	1,842.75	WO	HD	TR	_____
04/28/21	8425181	Revisions to Receiver's 22nd interim report	Fates, Edward (Ted)	0.70	428.40	2,271.15	WO	HD	TR	_____

08/05/21 14:31:53 PROFORMA STATEMENT FOR MATTER 375323.00004 (Thomas A. Seaman, Receiver for US Fine I) (Reporting)

**Fees for Matter 375323.00004.(Reporting)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
04/29/21	8429219	Work on the Receiver report, email with the Receiver regarding report and accounting documents.	Zaro, David	0.40	322.20	2,593.35	WO	HD	TR	_____
04/30/21	8431140	Review/further revise the draft of the receivership report (.5). Emails/call with Mr. Fates related to the report and follow-up regarding same (.3).	Zaro, David	0.80	644.40	3,237.75	WO	HD	TR	_____
05/03/21	8432874	Communications with Receiver re: revisions to interim report (.2) work on same (.2) meet and confer communications re: same with SEC counsel (.1)	Fates, Edward (Ted)	0.50	306.00	3,543.75	WO	HD	TR	_____
05/19/21	8448007	Meet and confer communications with SEC counsel re: Receiver's 22nd interim report (.2) communications with Receiver re: same (.2)	Fates, Edward (Ted)	0.40	244.80	3,788.55	WO	HD	TR	_____
05/20/21	8448939	Revise and finalize Receiver's 22nd interim report	Fates, Edward (Ted)	0.40	244.80	4,033.35	WO	HD	TR	_____
06/25/21	8490519	Emails with Mr. Robinson, assistant U.S. Attorney, related to status/distributions and follow-up on IRS.	Zaro, David	0.40	322.20	4,355.55	WO	HD	TR	_____
06/28/21	8492684	Prepare for/attend calls with Receiver and AUSA to address Mr. Robinson's inquiry as to taxes/distribution as it relates to AUSA's activity.	Zaro, David	0.80	644.40	4,999.95	WO	HD	TR	_____

**Proforma Summary**

<b>Timekeeper Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
000313	Zaro, David	3.70	805.50	2,980.35

08/05/21 14:31:53 PROFORMA STATEMENT FOR MATTER 375323.00004 (Thomas A. Seaman, Receiver for US Fine I) (Reporting)

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	3.30	612.00	2,019.60
		7.00		\$4,999.95
Subtotal Fees				\$4,999.95
Discount				0.00
Total Fees				4,999.95
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 12/31/2021: 10% off standard rates (automatic); no text editing; copies @ .15

**Account Summary – As Of 08/05/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	6,530.40	6,530.40	0.00	4,999.95	4,999.95	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	1,317.60	1,317.60	0.00	5,879.25	5,879.25	0.00	66,889.17	66,889.17	0.00
Collected	1,317.60	1,317.60	0.00	5,879.25	5,879.25	0.00	66,889.17	66,889.17	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
<b>WIP</b>	<b>6,530.40</b>	<b>6,530.40</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

08/05/21 14:31:53 PROFORMA STATEMENT FOR MATTER 375323.00004 (Thomas A. Seaman, Receiver for US Fine I) (Reporting)

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**Billing Address**

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

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08/05/21 14:31:54 PROFORMA STATEMENT FOR MATTER 375323.00007 (Thomas A. Seaman, Receiver for US Fine I) (Pending Litigation)

**Preliminary Billing Form**

Billing Atty: 000313 - Zaro, David      Matter #: 375323.00007      Client Name: Thomas A. Seaman, Receiver for US Fine I  
 Date of Last Billing: 07/20/21      Matter Name: Pending Litigation  
 Proforma Number: 1108745  
 Client/Matter Joint Group # 375323-1

**Fees for Matter 375323.00007.(Pending Litigation)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/15/21	8326901	Review Receiver's 20th Interim Report and prepare status report in pending litigation (.6).	Aspis, Norman	0.60	267.30	267.30	WO	HD	TR	_____
01/19/21	8326674	Confer with opposing counsel regarding status report in pending litigation and attention to filing the same (.4).	Aspis, Norman	0.40	178.20	445.50	WO	HD	TR	_____
01/20/21	8326664	Attention to correspondence with counsel regarding pending litigation matters (.3).	Aspis, Norman	0.30	133.65	579.15	WO	HD	TR	_____
01/25/21	8335783	Prepare for telephonic hearing in pending litigation matters (.3).	Aspis, Norman	0.30	133.65	712.80	WO	HD	TR	_____
01/26/21	8334801	Prepare for a participate in status conference in pending litigation (.5); attention to case administration issues regarding the same and confer with S. Scandura after status conference (.5).	Aspis, Norman	1.00	445.50	1,158.30	WO	HD	TR	_____
01/28/21	8332189	Confer with S. Sandura and regarding particular claim and review materials regarding the same (.6).	Aspis, Norman	0.60	267.30	1,425.60	WO	HD	TR	_____

08/05/21 14:31:54 PROFORMA STATEMENT FOR MATTER 375323.00007 (Thomas A. Seaman, Receiver for US Fine I) (Pending Litigation)

**Fees for Matter 375323.00007.(Pending Litigation)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/29/21	8334721	Confer with counsel regarding particular claimant (.3).	Aspis, Norman	0.30	133.65	1,559.25	WO	HD	TR	_____
04/14/21	8410829	Revisions to status report in pending Geng v. Chen matter in state court	Fates, Edward (Ted)	0.30	183.60	1,742.85	WO	HD	TR	_____
04/14/21	8414451	Prepare, revise, and file status report in pending litigation matter in anticipation of April 27 status conference (.6).	Aspis, Norman	0.60	267.30	2,010.15	WO	HD	TR	_____
04/27/21	8431439	Prepare for and participate in status conference in pending litigation matter, and confer with counsel regarding the same (1).	Aspis, Norman	1.00	445.50	2,455.65	WO	HD	TR	_____

**Disbursements for Matter 375323.00007 (Pending Litigation)**

Trans Date	Index	Type	Quantity	Amt	Circle	Action		
01/19/21	2696591	FILING – Filing Fees - Nationwide Legal LLC -STATUS REPORT REGARDING PENDING RECEIVERSHIP	0.00	75.75	WO	HD	TR	_____
01/19/21	2696592	MSNGR – Messenger - Nationwide Legal LLC -DELIVER COURTESY COPY	0.00	43.20	WO	HD	TR	_____
01/31/21	2700708	COURTC – Stephanie Hanks - LACOURT - Remote appearance fee	0.00	15.00	WO	HD	TR	_____
04/15/21	2705618	FILING – Nationwide Legal, LLC - Los Angeles County Superior Court, STATUS REPORT REGARDING PENDING RECEIVERSHIP	0.00	54.30	WO	HD	TR	_____
04/15/21	2711738	MSNGR – Messenger - Nationwide Legal LLC - LOS ANGELES COUNTY SUPERIOR COURT - STATUS REPORT REGARDING PENDING RECEIVERSHIP	0.00	43.75	WO	HD	TR	_____
05/02/21	2710941	COURTC – -Stephanie Hanks,LACOURT*BC596569-Remote Appearance Fee	0.00	15.00	WO	HD	TR	_____
05/02/21	2710942	COURTC – -Stephanie Hanks,LACOURT*BC596792-Remote	0.00	15.00	WO	HD	TR	_____

08/05/21 14:31:54 PROFORMA STATEMENT FOR MATTER 375323.00007 (Thomas A. Seaman, Receiver for US Fine I) (Pending Litigation)

**Disbursements for Matter 375323.00007 (Pending Litigation)**

Trans Date	Index	Type	Quantity	Amt
<b>Proforma Summary</b>				
<b>Timekeeper</b>				
<b>Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
001665	Fates, Edward (Ted)	0.30	612.00	183.60
002369	Aspis, Norman	5.10	445.50	2,272.05
		5.40		\$2,455.65
Subtotal Fees				\$2,455.65
Discount				0.00
Total Fees				2,455.65
Total Disbursements				262.00

**Attorney Billing Instructions**

- |   |                                       |
|---|---------------------------------------|
| <input type="checkbox"/> BILL ALL       | <input type="checkbox"/> Hold         |
| <input type="checkbox"/> BILL FEES ONLY | <input type="checkbox"/> Write Off    |
| <input type="checkbox"/> BILL COST ONLY | <input type="checkbox"/> Transfer All |

**Billing Instructions**

expires 12/31/2021: 10% off standard rates (automatic); no text editing; copies @ .15

**Account Summary – As Of 08/05/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,242.45	1,242.45	0.00	3,960.10	3,698.10	262.00	2,717.65	2,455.65	262.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	1,124.55	1,124.55	0.00	2,104.65	2,104.65	0.00	25,594.65	25,594.65	15.52
Collected	1,124.55	1,124.55	0.00	2,104.65	2,104.65	0.00	25,610.17	25,594.65	15.52
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>4,009.75</b>	<b>3,698.10</b>	<b>311.65</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						

08/05/21 14:31:54 PROFORMA STATEMENT FOR MATTER 375323.00007 (Thomas A. Seaman, Receiver for US Fine I) (Pending Litigation)

<i>Unalloc</i>	<i>0.00</i>
<i>Payment</i>	
<i>Client Trust</i>	<i>0.00</i>
<i>Balance</i>	

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**Billing Address**

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

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08/05/21 14:31:56 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: 07/20/21      Matter Name: Claims  
Proforma Number: 1108745  
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		
01/04/21	8307804	Review and forward to A. Juroe multiple emails from investors re: claims	Fates, Edward (Ted)	0.20	122.40	122.40	WO	HD	TR	_____
01/04/21	8313450	Several emails with claimants related to their claims issues (.6). Call with counsel related to the claims and email to Ms. Juroe as to claims (.5).	Zaro, David	1.10	886.05	1,008.45	WO	HD	TR	_____
01/06/21	8313417	Evaluate claims objection email, forward with advice to Receiver, respond to claimant (.4). Assess further claims objections and email with Ms. Juroe as to disputed claim (.7).	Zaro, David	1.10	886.05	1,894.50	WO	HD	TR	_____
01/07/21	8315874	Several emails concerning claims, objections and receive response, follow-up on documents from claimant (.5). Evaluate additional documents from Maria Want and husband, conference with Ms. Juroe (.40). Cal with Mr. Hsu as to Maria Want settlement (.2).	Zaro, David	1.10	886.05	2,780.55	WO	HD	TR	_____
01/08/21	8316026	Several emails with Mr. Seaman/Receiver and Ms. Juroe as to claims (.4). Call with	Zaro, David	0.60	483.30	3,263.85	WO	HD	TR	_____

08/05/21 14:31:56 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		
		Receiver as to investor claims issues (.2).								
01/11/21	8318122	Email/call with counsel related to disputed claims/approach to response (.3). Several emails/calls to follow-up with counsel and Receiver to address approach to disputed and amended claims (.3).	Zaro, David	0.60	483.30	3,747.15	WO	HD	TR	_____
01/12/21	8318859	Analysis of issues, email to address form of response/reply brief for the Receiver and approach to changes to allowed/disallowed claim amounts and descriptions (.8). Calls with counsel related to the claims issues and the Holland objection, investor claimants (.3).	Zaro, David	1.10	886.05	4,633.20	WO	HD	TR	_____
01/13/21	8320089	Call/emails related to Receiver's claims analysis of disputed claims and assess approach (.6). Prepare a draft reply/response to address the several hundred disputed claims (1.6). Attend conference meeting with Receiver concerning the claims disputes (.6).	Zaro, David	2.80	2,255.40	6,888.60	WO	HD	TR	_____
01/14/21	8322262	Several emails and follow-up on email to Receiver/Ms. Juroe as to USDC filings/hearing (.4). Work on the draft of the Receiver's response/reply and follow-up with revisions, email to Receiver (.9). Call/emails with Ms. Juroe related to claims issues (.9).	Zaro, David	2.20	1,772.10	8,660.70	WO	HD	TR	_____
01/15/21	8325380	Email/call with Ms. Juroe and assess approach to new claim/assess draft chart as to claims objection (1.1). Follow-up to review draft of the chart as to disputed	Zaro, David	3.60	2,899.80	11,560.50	WO	HD	TR	_____

08/05/21 14:31:56 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		
		claims (.8). Conference call with Receiver as to claims (.4). Revise/finalize the reply and exhibit reflecting the Receiver's corrections/disputed claims, emails with counsel and Receiver (1.2).								
01/18/21	8325404	Review open investor claimant emails several email with claimants and Receiver to address outstanding/unresolved claims, distribution issues/impact, assess documents from investors, and email as to distribution.	Zaro, David	0.90	724.95	12,285.45	WO	HD	TR	_____
01/19/21	8325433	Several emails/analysis of the investor claims and follow-up on records from Chapter 7 trustee as to assignment claim (.7). Several emails with claimants related to the claims issues and disputes (.4).	Zaro, David	1.10	886.05	13,171.50	WO	HD	TR	_____
01/20/21	8323388	Respond to inquiry re: claim from counsel for investor	Fates, Edward (Ted)	0.30	183.60	13,355.10	WO	HD	TR	_____
01/20/21	8325551	Several emails/analysis as to Dye/Nong and Holland claims (.7). Analysis of various claims issues, emails/calls with Receiver, Ms. Juroe and claimant's counsel (1.1).	Zaro, David	1.80	1,449.90	14,805.00	WO	HD	TR	_____
01/22/21	8328816	Evaluate the email/claims information as to claimant, EB-5 investor (.4). Emails and call with investor counsel and Receiver as to claims (.4).	Zaro, David	0.80	644.40	15,449.40	WO	HD	TR	_____
01/26/21	8328801	Advise on issues re: investor claim asserted by attorney S. Scandura	Fates, Edward (Ted)	0.20	122.40	15,571.80	WO	HD	TR	_____



08/05/21 14:31:56 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

**Fees for Matter 375323.00008.(Claims)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
01/27/21	8333256	Several emails concerning the claims of several claimants, address the disputes (.7). Follow-up on Court's notice/order and emails concerning disputed claims, claims motion and notice to claimants (.6).	Zaro, David	1.30	1,047.15	16,618.95	WO	HD	TR	_____
01/28/21	8337511	Several emails with Receiver and Ms. Juroe related to claims issues/dispute (.3). Conference call with Receiver and Ms. Juroe related to the disputed claims (.3).	Zaro, David	0.60	483.30	17,102.25	WO	HD	TR	_____
01/29/21	8337727	Evaluate revised exhibits concerning disputed claims and work on receiver's responses to claimants with open issues and call regarding the same (.6). Work on draft of amended proposed order and exhibits, follow-up emails (.6). Call with counsel as to the claims issues (.2). Revisions to the Proposed Amended Order, further emails regarding same (.2). Follow-up emails to claimant as to the missing/late claims (.5).	Zaro, David	2.10	1,691.55	18,793.80	WO	HD	TR	_____
02/01/21	8340029	Emails with investor and Receiver/Ms. Juroe to investors/corrections (.4). Emails and draft revisions to Amended Proposed Order, the notice of lodging regarding same (.7).	Zaro, David	1.10	886.05	19,679.85	WO	HD	TR	_____
02/02/21	8350112	Emails/analysis of further investor claims by Apollo Real Estate claimants (.4). Follow-up on call with Receiver as to the claims issues/order (.2).	Zaro, David	0.60	483.30	20,163.15	WO	HD	TR	_____
02/05/21	8344709	Evaluate issues/status of the IRS and FTB claims/returns and then draft memo/email to	Zaro, David	1.30	1,047.15	21,210.30	WO	HD	TR	_____

08/05/21 14:31:56 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		
		SEC to address timing/strategy as to the Receiver's tax returns and IRS determination issues (.9). Call to Receiver and to counsel to address the tax issues/follow-up (.4).								
02/08/21	8344781	Follow-up on email/call from investor counsel related to claims/disputes and confer with counsel.	Zaro, David	0.40	322.20	21,532.50	WO	HD	TR	_____
02/10/21	8348430	Several calls from investors as to claims/hearing/order.	Zaro, David	0.30	241.65	21,774.15	WO	HD	TR	_____
03/05/21	8374077	Emails from investors related to the claims and distribution process (.3). Emails concerning the FTB claims and Receiver response as well as IRS issues (.3).	Zaro, David	0.60	483.30	22,257.45	WO	HD	TR	_____
03/08/21	8375399	Several calls and emails with counsel as to the prompt determination by the IRS and taxes, Franchise tax issues, follow-up regarding same.	Zaro, David	0.60	483.30	22,740.75	WO	HD	TR	_____
03/10/21	8378015	Email from investor claimant, follow-up with Ms. Juroe regarding same (.3). Conference with Ms. Juroe concerning the claims order, the exhibits and allowed claims (.5).	Zaro, David	0.80	644.40	23,385.15	WO	HD	TR	_____
03/15/21	8378853	Address direct emails from investors re: claims process	Fates, Edward (Ted)	0.20	122.40	23,507.55	WO	HD	TR	_____
03/15/21	8383266	Several emails related to the investor claimants and the distribution/tax issues (.4). Email with Receiver related to the tax returns (.2).	Zaro, David	0.60	483.30	23,990.85	WO	HD	TR	_____

08/05/21 14:31:56 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

**Fees for Matter 375323.00008.(Claims)**

<b>Trans Date</b>	<b>Index</b>	<b>Description of Service Rendered</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Fees</b>	<b>Sum</b>	<b>Circle</b>	<b>Action</b>		
03/19/21	8388607	Conference with the Receiver related to the IRS issues/prompt determination strategy (.3). Communications with claimants concerning claims and distribution (.3).	Zaro, David	0.60	483.30	24,474.15	WO	HD	TR	_____
03/22/21	8388688	Evaluate Receiver's emails related to IRS tax claims, assess timing in order to address claimant request.	Zaro, David	0.30	241.65	24,715.80	WO	HD	TR	_____
04/02/21	8407168	Review/evaluate the Receiver's accounting, status as to tax returns, the approach to IRS and FTB.	Zaro, David	0.70	563.85	25,279.65	WO	HD	TR	_____
04/05/21	8407177	Follow-up with counsel related to the tax returns, timing and the prompt determination request.	Zaro, David	0.40	322.20	25,601.85	WO	HD	TR	_____
04/23/21	8422384	Evaluate the IRS communications and the tax returns from receiver concerning QSF, the pre-receivership periods, follow-up with counsel/Receiver.	Zaro, David	1.10	886.05	26,487.90	WO	HD	TR	_____
04/27/21	8425848	Work on report related to claims and IRS tax issues (.6). Several calls/meeting with counsel related to the taxes, prompt determination request (.5).	Zaro, David	1.10	886.05	27,373.95	WO	HD	TR	_____
05/13/21	8446419	Call with the Receiver related to taxes and claims/distribution (.2). Follow-up-email with counsel, Receiver and SEC concerning the tax issues/Receiver's strategy (.4).	Zaro, David	0.60	483.30	27,857.25	WO	HD	TR	_____
05/17/21	8449408	Analysis of further Receiver tax counsel's emails re: tax matters/claims of IRS/treatment (.5). Evaluate proposed strategy related to the IRS, follow-up to	Zaro, David	0.90	724.95	28,582.20	WO	HD	TR	_____

08/05/21 14:31:56 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	
		assess next steps (.4).							
05/19/21	8450402	Prepare for/attend the conference call with Receiver and tax accountant as to IRS/FTB and follow-up regarding same (.6). Email with investor claimant concerning the IRS and timing of distribution (.2).	Zaro, David	0.80	644.40	29,226.60	WO	HD	TR
06/02/21	8465781	Follow-up on investor call concerning the IRS timing approach to claims, distribution and review emails related to taxes.	Zaro, David	0.30	241.65	29,468.25	WO	HD	TR
06/16/21	8483081	Conference with Receiver related to the IRS/prompt determination and follow-up to investigate options with regard to expediting the review.	Zaro, David	0.60	483.30	29,951.55	WO	HD	TR
06/18/21	8483137	Evaluate the status of tax issues, research alternative approach to engage IRS, expedite review and brief research.	Zaro, David	1.40	1,127.70	31,079.25	WO	HD	TR
06/21/21	8483164	Call with the Receiver related to the progress of the IRS discussion as to prompt determination and follow-up.	Zaro, David	0.40	322.20	31,401.45	WO	HD	TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	38.30	805.50	30,850.65
001665	Fates, Edward (Ted)	0.90	612.00	550.80
		<u>39.20</u>		<u>\$31,401.45</u>
Subtotal Fees				\$31,401.45
Discount				0.00
Total Fees				31,401.45
Total Disbursements				0.00

08/05/21 14:31:56 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 12/31/2021: 10% off standard rates (automatic); no text editing; copies @ .15

**Account Summary – As Of 08/05/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	13,392.00	13,392.00	0.00	48,659.85	48,659.85	0.00	33,093.00	33,093.00	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	3,692.16	3,692.16	0.00
Billed	29,622.96	29,622.96	0.00	57,515.31	57,515.31	0.00	185,368.77	185,368.77	0.00
Collected	29,622.96	29,622.96	0.00	57,515.31	57,515.31	0.00	185,368.77	185,368.77	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP</b>	<b>48,659.85</b>	<b>48,659.85</b>	<b>0.00</b>						
<b>Balance</b>									
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc</b>	<b>0.00</b>								
<b>Payment</b>									
<b>Client Trust</b>	<b>0.00</b>								
<b>Balance</b>									

**Billing Address**

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

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08/05/21 14:31:57 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: 07/20/21      Matter Name: Distribution  
 Proforma Number: 1108745  
 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		
01/11/21	8318123	Email/call with counsel related to dispute as to distribution and claims/approach to response (.3). Several emails/calls to follow-up with counsel and Receiver to address approach to distribution/plan and disputed and amended claims (.3).	Zaro, David	0.60	483.30	483.30	WO	HD	TR	_____
01/18/21	8325405	Review pending investor claimant objections and several email with claimants and Receiver to address outstanding/unresolved, distribution issues/impact, assess documents from investors, and email as to distribution.	Zaro, David	0.90	724.95	1,208.25	WO	HD	TR	_____
01/29/21	8337734	Evaluate revised exhibits concerning disputed claims and work on distribution plan and receiver's responses to claimants with open issues and call regarding the same (.6). Work on draft of amended proposed order and exhibits, follow-up emails (.6). Call with counsel as to the distribution timing and issues (.2). Revisions to the Proposed Amended Order, further emails regarding same (.2). Follow-	Zaro, David	2.10	1,691.55	2,899.80	WO	HD	TR	_____

08/05/21 14:31:57 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

**Fees for Matter 375323.00010.(Distribution)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
		up emails to claimant as to the missing/late claims (.5).						
02/18/21	8354620	Evaluate/research distribution issues, methods for overseas payments and call with counsel related to strategy/options.	Zaro, David	0.80	644.40	3,544.20	WO	HD TR
06/24/21	8487214	Respond to several investor calls concerning the claims and distribution status, follow-up (.4). Conference with tax counsel as to possible approach to IRS/subordination of distribution (.3).	Zaro, David	0.70	563.85	4,108.05	WO	HD TR

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	5.10	805.50	4,108.05
		5.10		\$4,108.05
Subtotal Fees				\$4,108.05
Discount				0.00
Total Fees				4,108.05
Total Disbursements				0.00

**Attorney Billing Instructions**

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> Transfer All

**Billing Instructions**

expires 12/31/2021: 10% off standard rates (automatic); no text editing; copies @ .15

**Account Summary – As Of 08/05/21**

08/05/21 14:31:57 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	4,269.15	4,269.15	0.00	4,108.05	4,108.05	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	13,290.75	13,290.75	0.00	13,935.15	13,935.15	0.00	16,766.55	16,766.55	0.00
Collected	13,290.75	13,290.75	0.00	13,935.15	13,935.15	0.00	16,766.55	16,766.55	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	<b>Total</b>	<b>Fees</b>	<b>Costs</b>						
<b>WIP Balance</b>	<b>4,269.15</b>	<b>4,269.15</b>	<b>0.00</b>						
<b>AR Balance</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>						
<b>Unalloc Payment</b>	<b>0.00</b>								
<b>Client Trust Balance</b>	<b>0.00</b>								

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**Billing Address**

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

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08/05/21 14:31:58 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: 07/20/21  
 Proforma Number: 1108745

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		
01/25/21	8327761	Revisions to Receiver's 20th fee application	Fates, Edward (Ted)	0.40	244.80	244.80	WO	HD	TR	_____
04/26/21	8423591	Revisions to Receiver's 21st interim fee application, communications with Receiver re: same	Fates, Edward (Ted)	0.70	428.40	673.20	WO	HD	TR	_____
06/18/21	8483145	Work on the draft to the Receiver/Allen Matkins response to the OSC as to fee application.	Zaro, David	0.80	644.40	1,317.60	WO	HD	TR	_____
06/21/21	8483159	Review the filings/invoices, then work on draft of the response to the Order to Show Cause as to Fees of Allen Matkins, follow-up revisions to the draft brief (2.4). Call with Receiver and follow-up email (.3).	Zaro, David	2.70	2,174.85	3,492.45	WO	HD	TR	_____
06/22/21	8485951	Further work on the response brief to OSC, follow-up with Receiver and counsel.	Zaro, David	0.80	644.40	4,136.85	WO	HD	TR	_____
06/23/21	8486120	Further drafts/revisions to both the Receiver and Allen Matkins' responses to OSC, follow-up call with Receiver (2.2). Call with	Zaro, David	2.50	2,013.75	6,150.60	WO	HD	TR	_____

**Fees for Matter 375323.00011.(Employment & Professional Services)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		Receiver related to briefs, finalize same and prepare for filing (.3).					

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	6.80	805.50	5,477.40
001665	Fates, Edward (Ted)	1.10	612.00	673.20
		<u>7.90</u>		<u>\$6,150.60</u>
Subtotal Fees				\$6,150.60
Discount				0.00
Total Fees				6,150.60
Total Disbursements				0.00

**Attorney Billing Instructions**

<input type="checkbox"/> BILL ALL	<input type="checkbox"/> Hold
<input type="checkbox"/> BILL FEES ONLY	<input type="checkbox"/> Write Off
<input type="checkbox"/> BILL COST ONLY	<input type="checkbox"/> Transfer All

**Billing Instructions**

expires 12/31/2021: 10% off standard rates (automatic); no text editing; copies @ .15

**Account Summary – As Of 08/05/21**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	0.00	0.00	0.00	6,150.60	6,150.60	0.00	6,150.60	6,150.60	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	367.20	367.20	0.00	979.20	979.20	0.00	19,408.50	19,408.50	0.00
Collected	367.20	367.20	0.00	979.20	979.20	0.00	19,408.50	19,408.50	0.00
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

08/05/21 14:31:58 PROFORMA STATEMENT FOR MATTER 375323.00011 (Thomas A. Seaman, Receiver for US Fine I) (Employment & Professional Services)

	<i>Total</i>	<i>Fees</i>	<i>Costs</i>
<i>WIP Balance</i>	<i>6,359.40</i>	<i>6,359.40</i>	<i>0.00</i>
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>
<i>Unalloc Payment</i>	<i>0.00</i>		
<i>Client Trust Balance</i>	<i>0.00</i>		

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**Billing Address**

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

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