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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  
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

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

Date: April 11, 2022  
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-third interim application for approval and payment of fees and  
9 reimbursement of expenses ("Application"). This Application covers the period from  
10 July 1, 2021, through December 31, 2021 ("Twenty-Third Application Period"), and  
11 seeks interim approval of \$48,684.60 in fees and \$316.25 in expenses, and an order  
12 authorizing the Receiver to pay, on an interim basis, 80% of fees incurred  
13 (\$38,947.68) and 100% of the costs (\$316.25).

#### 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 Fourth Interim Report, which describe in detail the Receiver's and Allen Matkins'  
5 activities during the Twenty-Third Application Period. This Application seeks  
6 interim approval of \$48,684.60 in fees for a total of 63.00 hours worked, and  
7 payment on an interim basis of 80% of that amount, or \$38,947.68. The work  
8 performed is described task-by-task in Exhibit A and is broken down into the  
9 following categories:

Matter	Hours	Amount
General Receivership	3.30	\$2,762.10
Reporting	6.80	\$5,401.35
Pending Litigation	5.70	\$3,172.95
Claims	45.80	\$36,311.85
Distribution	1.40	\$1,036.35
TOTAL	63.00	\$48,684.60

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16 Allen Matkins has worked diligently and efficiently to assist the Receiver with  
17 the remaining legal issues and tasks facing the receivership estate. The firm's work  
18 has allowed the Receiver to recover, preserve and protect the substantial value of  
19 receivership estate assets and to monetize the recovered non-cash assets, which has  
20 resulted in the Receiver recovering gross receipts of \$77,215,034.99. The Receiver  
21 is presently holding \$63,729,237.00. Accordingly, Allen Matkins should be  
22 compensated on an interim basis for its work.

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

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

25 **1. General Receivership**

26 Allen Matkins' work in this category focused primarily upon responding to the  
27 subpoenas and inquiries by the United States Attorney with regard to their ongoing  
28 investigation and prosecution of criminal actions arising out of or related to the

1 Gemcoin and Gemcoin related fraudulent schemes. In addition, the United States  
2 Attorney also requested to interview the Receiver as a potential trial witness and to  
3 obtain accounting information. The reasonable and necessary fees for work in this  
4 category total \$2,762.10.

5 **2. Reporting**

6 Allen Matkins' work in this category focused on assisting the Receiver in  
7 preparing the Receiver's interim reports and recommendations. This work included  
8 drafting portions of the report, communications with the SEC and AUSA, and  
9 addressing timing issues related to taxes. The reasonable and necessary fees for  
10 work in this category total \$5,401.35.

11 **3. Pending Litigation**

12 Allen Matkins' work in this category relates to the pending state court  
13 litigation matters brought by investors against the Receivership Entities. While these  
14 State Court cases are stayed, the Superior Court judge has continue to require  
15 periodic status reports from the Plaintiffs and the Receiver. Once the below  
16 described distribution process has been concluded, these actions will become moot  
17 and the Receiver anticipates the cases will be dismissed. The reasonable and  
18 necessary fees for work in this category total \$3,172.95.

19 **4. Claims**

20 As reflected in the Receiver's Interim Reports and filings, there were 8500  
21 investor claims filed with the Receiver with a face value of \$135 million. The  
22 Receiver requested and the Court approved the Receiver's recommendation to allow  
23 claims totaling approximately \$80 million. With this large number of claimants and  
24 the delays in the distribution process have come ongoing inquiries from investors  
25 seeking information regarding the status of the case and the timing of distributions.  
26 Allen Matkins refers the vast majority of such inquiries to the Receiver's office,  
27 however, some claimant inquiries were handled by Allen Matkins during this period.  
28

1 The vast majority of Allen Matkins work during this period has been directed  
2 toward resolving the numerous complex tax issues and claims by the Internal  
3 Revenue Service ("IRS") and California Franchise Tax Board ("FTB"), arising out of  
4 pre-receivership and post-receivership tax returns. The resolution of the IRS's and  
5 FTB's tax claims is a condition precedent to Receiver's distribution to investors and  
6 creditors.

7 Allen Matkins providing legal guidance and assistance to the Receiver in an  
8 effort to expedite the IRS' review of tax returns. This work has research and analysis  
9 of a variety of tax issues and work on the Receiver's efforts to obtain either a  
10 "Prompt Determination" or a "Prompt Assessment" of the tax returns by the IRS.

11 As previously noted, the timing of the IRS's review of the tax returns and the  
12 resolution of any disputes arising out of such review, if any, will determine the  
13 amount and timing of the Receiver's distribution to investors. Allen Matkins' tax  
14 counsel has worked to expedite the review of tax returns through the established  
15 procedures (i.e. prompt determination and prompt assessment) as well as through  
16 efforts to contact the agency directly. Additionally, Allen Matkins has been  
17 attempting to gain the cooperation of the IRS in accordance with Directive 137,  
18 whereby the IRS would subordinate its present or future claims to the claims of  
19 investor claimants.

20 Allen Matkins has had some limited success in reaching out to the IRS.  
21 However, even with the recent filing by the IRS of a claim, the Receiver remains  
22 stymied due to the IRS' refusal to cooperate. As of the date of this filing, we still  
23 have no answer from the IRS but we continue to pursue every available avenue and  
24 opportunity to gain the IRS' cooperation.

25 The reasonable and necessary fees for work in this category total \$36,311.85.

## 26 **5. Distribution**

27 Allen Matkins' work in this category focused on issues specific to the  
28 anticipated distributions to investors with allowed claims. As discussed above, much

1 of Allen Matkins' work involved addressing the unique tax issues and developing a  
2 plan of distribution which would allow for the maximum distribution to investors.  
3 The reasonable and necessary fees for work in this category total \$1,036.35.

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

5 Allen Matkins requests the Court approve reimbursement of \$316.25 in out-of-  
6 pocket costs. The itemization of such expenses is summarized below by category.

7 <b>Category</b>	<b>Total</b>
8 Court/Filing Fees	\$140.80
9 Messenger/FedEx Fees	\$123.55
10 Postage	\$9.00
11 Duplication	\$42.90
TOTAL	\$ 316.25

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

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

21 In allowing fees, a court should consider "the time, labor and skill required,  
22 but not necessarily that actually expended, in the proper performance of the duties  
23 imposed by the court upon the receiver[], the fair value of such time, labor and skill  
24 measured by conservative business standards, the degree of activity, integrity and  
25 dispatch with which the work is conducted and the result obtained." *United States v.*  
26 *Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks  
27 omitted). In practical terms, receiver and professional compensation thus ultimately  
28 rests upon the result of an equitable, multi-factor balancing test involving the

1 "economy of administration, the burden that the estate may be able to bear, the  
2 amount of time required, although not necessarily expended, and the overall value of  
3 the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F. 2d 232, 237 (3d Cir.  
4 1970). Regardless of how this balancing test is formulated, no single factor is  
5 determinative and "a reasonable fee is based [upon] all circumstances surrounding  
6 the receivership." *SEC v. W.L. Moody & Co., Bankers (Unincorporated)*, 374 F.  
7 Supp. 465, 480 (S.D. Tex. 1974).

8 As a preliminary matter, the PI Order conferred on the Receiver substantial  
9 duties and powers, including to conduct such investigation and discovery as is  
10 necessary to locate and account for all receivership assets, take such action as is  
11 necessary and appropriate to assume control over and preserve receivership assets,  
12 and employ attorneys and others to investigate and, where appropriate, institute,  
13 pursue, and prosecute all claims and causes of action of whatever kind and nature.  
14 *See* TRO, Part XI; PI Order, Part XI.

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

21 Allen Matkins has endeavored to staff matters as efficiently as possible while  
22 remaining cognizant of the complexity of issues presented. The request for fees is  
23 based on Allen Matkins' customary billing rates charged for comparable services  
24 provided in other matters, less a 10% discount.

25 The work performed by Allen Matkins was essential to carrying out the  
26 Receiver's Court-ordered duties. Allen Matkins has worked diligently to preserve  
27 and protect the assets of the receivership estate, investigate and recover sums  
28 transferred to third parties, and maximize the funds available for ultimate distribution



1 to investors. Moreover, Allen Matkins seeks payment of only 80% of fees incurred  
2 on an interim basis in recognition of the fact that its work in assisting the Receiver is  
3 ongoing. Payment of the proposed 20% holdback will be sought at the conclusion of  
4 the receivership. Allen Matkins' fees are fair and reasonable and should be approved  
5 and paid on an interim basis.

6 **IV. CONCLUSION**

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

- 8 1. Approving Allen Matkins' fees, on an interim basis, of \$48,684.60;
- 9 2. Authorizing and directing the Receiver to pay 80% of approved fees, or  
10 \$38,947.68, from the assets of the Receivership Entities;
- 11 3. Approving Allen Matkins' costs in the amount of \$316.25, and  
12 authorizing and directing the Receiver to reimburse such costs in full; and
- 13 4. For such other and further relief as the Court deems appropriate.

14  
15 Dated: March 11, 2022

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

17 By:           /s/ Edward G. Fates

18 EDWARD G. FATES  
19 Attorneys for Receiver  
20 THOMAS A. SEAMAN

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# **EXHIBIT A**

03/02/22 17:24:01 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: 08/06/21  
 Proforma Number: 1149624

Matter #: 375323.00002

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

Client/Matter Joint Group # 375323-1

Client Matter Number:

**Fees for Matter 375323.00002.(General Receivership)**

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
07/01/21	8497192	Follow-up on the call/email from the AUSA to obtain costs of claim process and distribution (.6). Follow-up analysis of the AUSA judgment/IRS' present position, the approach to prompt determination or assessment, possible engagement with AUSA (.8).	Zaro, David	1.40	1,171.80	1,171.80	WO	HD	TR	_____
07/08/21	8502020	Email/follow-up on the joint statement related to restitution AUSA's and assess impact on receivership and distribution.	Zaro, David	0.70	585.90	1,757.70	WO	HD	TR	_____
08/11/21	8536588	Several emails and call with counsel related to restitution AUSA/Mr. Richardson and collection issues.	Zaro, David	0.40	334.80	2,092.50	WO	HD	TR	_____
12/15/21	8669716	Several emails/voicemails with AUSA and Receiver related to trial testimony.	Zaro, David	0.40	334.80	2,427.30	WO	HD	TR	_____
12/16/21	8669761	Several emails with the Receiver and the United States Attorney related to the Receiver testimony/criminal proceeding.	Zaro, David	0.40	334.80	2,762.10	WO	HD	TR	_____

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

03/02/22 17:24:01 PROFORMA STATEMENT FOR MATTER 375323.00002 (Thomas A. Seaman, Receiver for US Fine I) (General Receivership)

Trans Date	Index	Type	Quantity	Amt				
07/20/21	2723383	BW – Duplication - Black & White Copies	131.00	19.65	WO	HD	TR	_____
07/20/21	2725430	POST – Postage - RICOH -5 Large Envelopes	0.00	9.00	WO	HD	TR	_____
07/20/21	2727965	FILING – Filing Fees - Nationwide Legal LLC - LOS ANGELES COUNTY SUPERIOR COURT, STATUS REPORT REGARDING PENDING RECEIVERSHIP	0.00	54.85	WO	HD	TR	_____
07/20/21	2727966	MSNGR – Messenger - Nationwide Legal LLC - LOS ANGELES SUPERIOR COURT OF CALIFORNIA	0.00	44.30	WO	HD	TR	_____
08/02/21	2726751	BW – Duplication - Black & White Copies	20.00	3.00	WO	HD	TR	_____
08/02/21	2728430	FILING – Nationwide Legal, LLC - LOS ANGELES COUNTY SUPERIOR COURT, NOTICE OF CONTINUED STATUS CONFERENCE	0.00	46.75	WO	HD	TR	_____
08/02/21	2728431	MSNGR – Nationwide Legal, LLC - LOS ANGELES SUPERIOR COURT OF CALIFORNIA, Deliver Courtesy	0.00	32.20	WO	HD	TR	_____
10/25/21	2737995	BW – Duplication - Black & White Copies	135.00	20.25	WO	HD	TR	_____
10/25/21	2740310	FILING – Filing - Nationwide Legal LLC - LOS ANGELES SUPERIOR COURT OF CALIFORNIA	0.00	39.20	WO	HD	TR	_____
10/25/21	2740311	MSNGR – Messenger - Nationwide Legal LLC - LOS ANGELES SUPERIOR COURT OF CALIFORNIA	0.00	47.05	WO	HD	TR	_____

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	3.30	837.00	2,762.10
		3.30		\$2,762.10
Subtotal Fees				\$2,762.10
Discount				0.00
Total Fees				2,762.10
Total Disbursements				316.25

**Attorney Billing Instructions**

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

03/02/22 17:24:01 PROFORMA STATEMENT FOR MATTER 375323.00002 (Thomas A. Seaman, Receiver for US Fine I) (General Receivership)

**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .15

**Account Summary – As Of 03/02/22**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	8,422.10	7,586.10	836.00	4,630.95	4,630.95	0.00	195,188.32	161,257.95	33,930.37
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	1,125.57	190.17	935.40
Billed	3,015.30	3,014.55	0.75	0.00	0.00	0.00	152,777.97	152,777.97	33,614.12
Collected	3,015.30	3,014.55	0.75	0.00	0.00	0.00	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>7,902.35</b>	<b>7,586.10</b>	<b>316.25</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  
 SEAMAN, THOMAS (Receiver)  
 1 Park Plaza, Suite 580  
 Irvine, CA 92614

03/02/22 17:24:03 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: 12/15/21  
 Proforma Number: 1149624

Matter #: 375323.00004

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

Client/Matter Joint Group # 375323-1

Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
08/05/21	8529426	Communications with Receiver re: preparation of interim report	Fates, Edward (Ted)	0.10	64.35	64.35	WO	HD	TR	_____
08/05/21	8531256	Several emails related to Receiver/counsel to address accounting/report and work on the draft narrative report for past two quarters, follow-up regarding same.	Zaro, David	1.10	920.70	985.05	WO	HD	TR	_____
08/06/21	8530480	Review and revise Receiver's 23rd interim report	Fates, Edward (Ted)	0.50	321.75	1,306.80	WO	HD	TR	_____
08/06/21	8534526	Emails and call with Receiver and counsel regarding Receiver Report (.4). Work on the draft report of the Receiver to address narrative concerning tax and distribution issues (.9).	Zaro, David	1.30	1,088.10	2,394.90	WO	HD	TR	_____
08/11/21	8534039	Revisions to Receiver's 23rd interim report (.2) meet and confer communications with SEC counsel re: report (.2)	Fates, Edward (Ted)	0.40	257.40	2,652.30	WO	HD	TR	_____
08/11/21	8536597	Work with Receiver/counsel as to the 23rd report and approach to receivership in light of delays in distribution and confer with counsel.	Zaro, David	0.70	585.90	3,238.20	WO	HD	TR	_____

03/02/22 17:24:03 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		
08/23/21	8546658	Email related to the Receiver/Chen report and follow-up on the status of tax issues.	Zaro, David	0.20	167.40	3,405.60	WO	HD	TR	_____
08/30/21	8556687	Call with tax counsel, then further work on drafting/revising the Receiver Report and Recommendations, and Receiver and Allen Matkins fee applications.	Zaro, David	0.80	669.60	4,075.20	WO	HD	TR	_____
09/01/21	8558381	Revisions to the report, follow-up on the Receiver recommendations, status of taxes and revisions to fee application (.6) Emails with Receiver and counsel as to the report and fee applications (.2).	Zaro, David	0.80	669.60	4,744.80	WO	HD	TR	_____
09/02/21	8561939	Several emails with Receiver and review of the report/application and response.	Zaro, David	0.40	334.80	5,079.60	WO	HD	TR	_____
10/13/21	8611098	Revise and finalize Receiver's 23rd interim report	Fates, Edward (Ted)	0.50	321.75	5,401.35	WO	HD	TR	_____

**Proforma Summary**

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	5.30	837.00	4,436.10
001665	Fates, Edward (Ted)	1.50	643.50	965.25
		<u>6.80</u>		<u>\$5,401.35</u>
Subtotal Fees				\$5,401.35
Discount				0.00
Total Fees				5,401.35
Total Disbursements				0.00

**Attorney Billing Instructions**

03/02/22 17:24:03 PROFORMA STATEMENT FOR MATTER 375323.00004 (Thomas A. Seaman, Receiver for US Fine I) (Reporting)

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

---

**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .15

**Account Summary – As Of 03/02/22**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	7,712.55	7,712.55	0.00	2,311.20	2,311.20	0.00	83,788.65	83,788.65	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	3,342.48	3,342.48	0.00
Billed	6,317.55	6,317.55	0.00	0.00	0.00	0.00	71,889.12	71,889.12	0.00
Collected	6,317.55	6,317.55	0.00	0.00	0.00	0.00	71,889.12	71,889.12	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>7,712.55</b>	<b>7,712.55</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  
 SEAMAN, THOMAS (Receiver)  
 1 Park Plaza, Suite 580  
 Irvine, CA 92614



03/02/22 17:24:05 PROFORMA STATEMENT FOR MATTER 375323.00007 (Thomas A. Seaman, Receiver for US Fine I) (Pending Litigation)

**Preliminary Billing Form**

Billing Atty: 000313 - Zaro, David  
 Date of Last Billing: 12/15/21  
 Proforma Number: 1149624

Matter #: 375323.00007

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

Client/Matter Joint Group # 375323-1

Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
07/19/21	8509611	Advise on issues related to pending Geng v. Chen case in state court	Fates, Edward (Ted)	0.20	128.70	128.70	WO	HD	TR	_____
07/19/21	8525211	Review relevant pleadings and prepare status report for pending action and confer with counsel regarding the same (.7).	Aspis, Norman	0.70	311.85	440.55	WO	HD	TR	_____
07/20/21	8524412	Review, revise, and file status report for pending Geng action and confer with counsel regarding the same (.3).	Aspis, Norman	0.30	133.65	574.20	WO	HD	TR	_____
07/30/21	8524249	Prepare for and participate in status conference in state court actions, and draft notice of continuance of status conference (1.5).	Aspis, Norman	1.50	668.25	1,242.45	WO	HD	TR	_____
11/01/21	8641847	Address issues re: upcoming hearing in Geng v. Chen matter in LA Superior Court; confer with counsel re: same and telephonic appearance	Fates, Edward (Ted)	0.50	321.75	1,564.20	WO	HD	TR	_____
11/03/21	8623755	Calls from Attorney L. Liu regarding pending state court case against S. Chen et al.	Fates, Edward (Ted)	0.80	514.80	2,079.00	WO	HD	TR	_____

03/02/22 17:24:05 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
11/04/21	8641862	Prepare for and attend status conference in pending investor actions in LA Superior Court	Fates, Edward (Ted)	1.40	900.90	2,979.90	WO	HD TR
12/08/21	8658662	Call from counsel for investor plaintiffs in state court litigation regarding status of receivership and stay of litigation against entities	Fates, Edward (Ted)	0.30	193.05	3,172.95	WO	HD TR

**Proforma Summary**

**Timekeeper**

Number	Timekeeper	Hours	Rate	Amounts
001665	Fates, Edward (Ted)	3.20	643.50	2,059.20
002369	Aspis, Norman	2.50	445.50	1,113.75
		<u>5.70</u>		<u>\$3,172.95</u>
Subtotal Fees				\$3,172.95
Discount				0.00
Total Fees				3,172.95
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 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .15

**Account Summary – As Of 03/02/22**

Fiscal YTD		Calendar YTD			LTD	
Total	Fees	Disb.	Total	Fees	Disb.	Total

03/02/22 17:24:05 PROFORMA STATEMENT FOR MATTER 375323.00007 (Thomas A. Seaman, Receiver for US Fine I) (Pending Litigation)

Worked	5,027.85	5,027.85	0.00	904.50	904.50	0.00	33,093.67	33,078.15	15.52
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Billed	3,580.20	3,580.20	0.00	0.00	0.00	0.00	28,050.30	28,050.30	15.52
Collected	3,580.20	3,580.20	0.00	0.00	0.00	0.00	28,065.82	28,050.30	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 Balance</b>	<b>5,186.55</b>	<b>5,027.85</b>	<b>158.70</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  
 SEAMAN, THOMAS (Receiver)  
 1 Park Plaza, Suite 580  
 Irvine, CA 92614

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03/02/22 17:24:08 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

**Preliminary Billing Form**

Billing Atty: 000313 - Zaro, David  
 Date of Last Billing: 12/15/21  
 Proforma Number: 1149624

Matter #: 375323.00008

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

Client/Matter Joint Group # 375323-1

Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
07/01/21	8497185	Review issues related to IRS claim and evaluate the status of prompt determination request, call with Receiver (.6). Follow-up on the IRS claim issues with Receiver counsel, analysis of current and alternative strategy and alternatives, (06/30) emails to AUSA/Receiver as to IRS claim/returns related matters and review letter (1.6).	Zaro, David	2.20	1,841.40	1,841.40	WO	HD	TR	_____
07/02/21	8499414	Further call with tax counsel as to Receiver's efforts to engage the IRS related to the IRS claims and returns and brief research regarding prompt assessment/determination (.8). Call/follow-up on investor claimant and timing of distribution (.3). Call with Receiver as to the tax strategy/next steps (.2).	Zaro, David	1.30	1,088.10	2,929.50	WO	HD	TR	_____
07/12/21	8503653	Evaluate income tax issues.	Kraus, Katherine	0.70	488.25	3,417.75	WO	HD	TR	_____
07/12/21	8504148	Evaluate emails and analysis of memorandum related to tax claims, issues and status to assess options for expediting the review process (.7). Meeting with tax	Zaro, David	1.20	1,004.40	4,422.15	WO	HD	TR	_____

03/02/22 17:24:08 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		
		counsel to work on strategy and options as to IRS claim matter (.5).								
07/13/21	8504714	Evaluate income tax issues.	Kraus, Katherine	1.00	697.50	5,119.65	WO	HD	TR	_____
07/14/21	8505489	TC with Zaro re. tax issues.	Kraus, Katherine	0.30	209.25	5,328.90	WO	HD	TR	_____
07/14/21	8510505	Call with tax counsel and Receiver counsel related to IRS claims strategy, follow-up regarding constructive trust theory (.4).	Zaro, David	0.40	334.80	5,663.70	WO	HD	TR	_____
07/15/21	8509220	Analysis and call with tax and Receiver's counsel related to Chen-IRS tax issue/follow-up thereon to email Receiver with Proposed Strategy (.6); Call to Receiver related to the tax issues and strategy follow-up (.2).	Zaro, David	0.80	669.60	6,333.30	WO	HD	TR	_____
07/19/21	8509992	TC with Zarro re. tax issues.	Kraus, Katherine	0.20	139.50	6,472.80	WO	HD	TR	_____
07/19/21	8512592	Evaluate several emails from Receiver and tax accountant strategy (.5). Call with tax counsel related to the IRS and strategy (.4).	Zaro, David	0.90	753.30	7,226.10	WO	HD	TR	_____
07/20/21	8512011	Emails related to the tax returns, tax transcript and call with tax counsel (.4). Call with Receiver related to the tax issues and strategy, follow-up regarding same (.3).	Zaro, David	0.70	585.90	7,812.00	WO	HD	TR	_____
07/21/21	8512864	Several emails/call with counsel related to the tax issues and evaluate additional issues as to claims and distribution, analysis and approach to reserve.	Zaro, David	0.60	502.20	8,314.20	WO	HD	TR	_____

03/02/22 17:24:08 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		
07/22/21	8513418	TC with Coombs and Seaman regarding tax issues. Email with IRS regarding tax issues.	Kraus, Katherine	0.90	627.75	8,941.95	WO	HD	TR	_____
07/22/21	8514136	Call/email related to the claims of IRS, status of returns (.4). Attend the meeting with tax counsel, Receiver, Receiver's tax accountant and counsel to evaluate the options to expedite IRS review, follow-up with tax counsel (1.4).	Zaro, David	1.80	1,506.60	10,448.55	WO	HD	TR	_____
07/23/21	8515789	Review of several emails/call to Mr. Richard Robinson, follow-up with tax counsel and Receiver, tax accountant as to the IRS (.6). Emails to Receiver and tax accountant regarding potential IRS contacts, follow-up regarding same (.8).	Zaro, David	1.40	1,171.80	11,620.35	WO	HD	TR	_____
07/26/21	8520248	Emails with tax counsel related to the contacts with IRS/approach (.3). Email with claimant related to the claims and distribution process (.3).	Zaro, David	0.60	502.20	12,122.55	WO	HD	TR	_____
07/27/21	8520264	Emails with tax counsel related to IRS and follow-up as to IRS contacts (.4). Email wot claimant related to claim/distribution issues (.3).	Zaro, David	0.70	585.90	12,708.45	WO	HD	TR	_____
08/02/21	8527472	Email to/conference with Receiver related to the IRS claim strategy, constructive trust and related issues (.5). Email with tax counsel and follow-up (.2).	Zaro, David	0.70	585.90	13,294.35	WO	HD	TR	_____
08/03/21	8527821	Evaluate income tax issues. TC with Zaro regarding tax issues.	Kraus, Katherine	1.00	697.50	13,991.85	WO	HD	TR	_____

03/02/22 17:24:08 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		
08/03/21	8528377	Conference with tax counsel related to the approach to the IRS/strategy issues (.5). Emails/follow-up call with Receiver and counsel related to the IRS claims (.4).	Zaro, David	0.90	753.30	14,745.15	WO	HD	TR	_____
08/04/21	8531246	Call with Receiver/email related to the IRS claims and strategy (.4). Follow-up on SEC email, respond to SEC as to claims, timing IRS Issues (.4).	Zaro, David	0.80	669.60	15,414.75	WO	HD	TR	_____
08/10/21	8534568	Emails with AUSA and tax counsel, follow-up on strategy concerning the IRS/FTB (.5).	Zaro, David	0.50	418.50	15,833.25	WO	HD	TR	_____
08/11/21	8534616	Review tax filings and IRS correspondence. Evaluate alternatives for prompt resolution of tax issues.	Kraus, Katherine	1.30	906.75	16,740.00	WO	HD	TR	_____
08/12/21	8535633	Evaluate income tax issues. Correspondence with IRS regarding resolution of tax issues.	Kraus, Katherine	0.60	418.50	17,158.50	WO	HD	TR	_____
08/13/21	8536413	TCs with IRS and Zaro regarding income tax issues.	Kraus, Katherine	0.60	418.50	17,577.00	WO	HD	TR	_____
08/17/21	8539171	TC with Seaman, Zaro and Coombs regarding tax issues.	Kraus, Katherine	0.50	348.75	17,925.75	WO	HD	TR	_____
08/17/21	8540461	Analysis of status of returns/prompt assessment and prompt determination (.4); Several calls with tax counsel, then meeting with the Receiver, tax accountant, tax counsel related to IRS communications and next steps (.5).	Zaro, David	0.90	753.30	18,679.05	WO	HD	TR	_____



03/02/22 17:24:08 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>		
08/24/21	8545386	Leave voicemail for IRS regarding tax issues.	Kraus, Katherine	0.20	139.50	18,818.55	WO	HD	TR	_____
08/25/21	8550374	Call with investor claimant related to the case claims and distribution issues/timing (.3). Call to tax counsel to address follow-up with the IRS as to prompt determination (.3).	Zaro, David	0.60	502.20	19,320.75	WO	HD	TR	_____
08/26/21	8547645	Exchange voicemails with IRS (Bill Beard) regarding income tax issues. TC with IRS Chief Counsel (Peter McCary) regarding tax issues.	Kraus, Katherine	0.90	627.75	19,948.50	WO	HD	TR	_____
08/26/21	8551312	Several emails related to the IRS with the Receiver tax counsel (.4). Further email and call with the Receiver, follow-up (.3).	Zaro, David	0.70	585.90	20,534.40	WO	HD	TR	_____
09/03/21	8559057	TC with McCary (IRS) regarding income tax issues.	Kraus, Katherine	0.40	279.00	20,813.40	WO	HD	TR	_____
09/03/21	8561949	Email/call related to claims of IRS regarding tax accountants and status of communications and follow-up (.3). Call with counsel related to tax accountants and strategy as to IRS and possible motion/subordination (.5).	Zaro, David	0.80	669.60	21,483.00	WO	HD	TR	_____
09/08/21	8564109	Call with investor related to the claims and distribution issues and follow-up with receiver.	Zaro, David	0.30	251.10	21,734.10	WO	HD	TR	_____
09/09/21	8563301	TC with Peter McCary at the IRS regarding tax issues.	Kraus, Katherine	0.50	348.75	22,082.85	WO	HD	TR	_____

03/02/22 17:24:08 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		
09/11/21	8564464	Analysis of tax procedures available. Email with Zaro re. tax issues.	Kraus, Katherine	1.50	1,046.25	23,129.10	WO	HD	TR	_____
09/13/21	8567896	Evaluate the memorandum related to IRS regulations and closing process/options and risk, email with counsel and call with receiver related to options as to IRS.	Zaro, David	0.70	585.90	23,715.00	WO	HD	TR	_____
09/14/21	8567235	TC with Zaro re. tax issues. Prepare powers of attorney.	Kraus, Katherine	1.10	767.25	24,482.25	WO	HD	TR	_____
09/14/21	8569064	Prepare for/attend call with tax counsel as to IRS status/strategy (.4). Call with Receiver related to the IRS strategy and approach (.4). Email with Receiver related to the tax issues, risks and strategy (.3). Email to the SEC counsel related to status of the IRS, claims and distribution (.3).	Zaro, David	1.40	1,171.80	25,654.05	WO	HD	TR	_____
09/19/21	8571391	Email with Peter McCary (IRS) regarding income tax issues.	Kraus, Katherine	0.60	418.50	26,072.55	WO	HD	TR	_____
09/22/21	8576193	Several emails with tax counsel as to the power of attorney/IRS and follow-up with Receiver as to several tax issues.	Zaro, David	0.40	334.80	26,407.35	WO	HD	TR	_____
09/23/21	8580947	Call with claimant/investor related to the claims/distribution timing, IRS and follow-up (.2). Call with tax counsel related to the IRS returns (.4).	Zaro, David	0.60	502.20	26,909.55	WO	HD	TR	_____
09/24/21	8581178	Call with Receiver related to the tax claims and strategy to resolve (.2). Emails with tax counsel and Receiver related to the IRS and power of attorney and next steps (.5).	Zaro, David	0.70	585.90	27,495.45	WO	HD	TR	_____

03/02/22 17:24:08 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		
09/25/21	8578361	Address income tax issues.	Kraus, Katherine	0.50	348.75	27,844.20	WO	HD	TR	_____
09/27/21	8579286	Address income tax issues.	Kraus, Katherine	0.40	279.00	28,123.20	WO	HD	TR	_____
09/27/21	8582320	Call with tax counsel, follow-up on emails with Ms. Kraus related to the tax issues, further call as to power of attorney and claims issues/appearance with IRS.	Zaro, David	0.70	585.90	28,709.10	WO	HD	TR	_____
10/09/21	8595006	Correspondence with IRS regarding tax issues.	Kraus, Katherine	0.30	209.25	28,918.35	WO	HD	TR	_____
10/15/21	8604188	Several emails from Ms. Kraus and Mr. Coombs as to IRS tax issues.	Zaro, David	0.60	502.20	29,420.55	WO	HD	TR	_____
10/19/21	8604647	Review emails from Coombs.	Kraus, Katherine	0.60	418.50	29,839.05	WO	HD	TR	_____
10/19/21	8606813	Evaluate the issues and the IRS and assess letters and emails from counsel and IRS (.6). Meeting with tax counsel to assess the response to IRS and Receiver (.5). Meeting with Receiver to address the tax issues, response and letters from IRS, follow-up regarding same (.5).	Zaro, David	1.60	1,339.20	31,178.25	WO	HD	TR	_____
10/20/21	8608169	Several calls/conference with tax counsel as to the IRS letter/next steps for the prompt determination.	Zaro, David	0.40	334.80	31,513.05	WO	HD	TR	_____
11/02/21	8623391	Meeting with tax counsel related to IRS and address the timing of IRS review.	Zaro, David	0.40	334.80	31,847.85	WO	HD	TR	_____

03/02/22 17:24:08 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>		
11/04/21	8623943	Email with IRS regarding tax issues.	Kraus, Katherine	0.20	139.50	31,987.35	WO	HD	TR	_____
11/10/21	8632718	Several emails and call with Receiver related to the investor claimant and the IRS tax claims/returns.	Zaro, David	0.40	334.80	32,322.15	WO	HD	TR	_____
11/12/21	8635551	Follow-up with Receiver and tax counsel related to the Receiver returns, IRS timing and response.	Zaro, David	0.30	251.10	32,573.25	WO	HD	TR	_____
11/23/21	8646338	Follow-up on the tax issues and further delays by IRS, research of the Receiver's options with regard to the IRS timing for actions/district court jurisdiction and the conference with Receiver/tax counsel.	Zaro, David	2.40	2,008.80	34,582.05	WO	HD	TR	_____
12/03/21	8658687	Email/follow-up with overseas investors as to claims and distribution timing (.3). Follow-up with tax counsel and Receiver related to IRS claims and next steps (.3).	Zaro, David	0.60	502.20	35,084.25	WO	HD	TR	_____
12/06/21	8656624	TC with Zaro. Email with McCary (IRS) re. tax issues.	Kraus, Katherine	0.20	139.50	35,223.75	WO	HD	TR	_____
12/07/21	8658795	Calls/emails with tax counsel related to distribution/taxes and prospect for expediting the IRS review of returns.	Zaro, David	0.60	502.20	35,725.95	WO	HD	TR	_____
12/08/21	8660028	Emails to/from the Receiver to address the taxes, the distribution and strategy.	Zaro, David	0.40	334.80	36,060.75	WO	HD	TR	_____
12/17/21	8671512	Several calls from investor related to the claims issues and brief call with the Receiver related to the claims/distribution.	Zaro, David	0.30	251.10	36,311.85	WO	HD	TR	_____

03/02/22 17:24:08 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

**Proforma Summary**

**Timekeeper**

<b>Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
000313	Zaro, David	31.30	837.00	26,198.10
002372	Kraus, Katherine	14.50	697.50	10,113.75
		45.80		\$36,311.85
Subtotal Fees				\$36,311.85
Discount				0.00
Total Fees				36,311.85
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .15

**Account Summary – As Of 03/02/22**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	56,985.75	56,985.75	0.00	16,572.60	16,572.60	0.00	269,666.01	269,666.01	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	6,274.71	6,274.71	0.00
Billed	49,188.51	49,188.51	0.00	0.00	0.00	0.00	204,934.32	204,934.32	0.00
Collected	49,188.51	49,188.51	0.00	0.00	0.00	0.00	204,934.32	204,934.32	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>56,985.75</b>	<b>56,985.75</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>									

03/02/22 17:24:08 PROFORMA STATEMENT FOR MATTER 375323.00008 (Thomas A. Seaman, Receiver for US Fine I) (Claims)

**Client Trust**                    **0.00**  
**Balance**

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**Billing Address**

Thomas A. Seaman, Receiver for US Fine Investment Arts Inc  
SEAMAN, THOMAS (Receiver)  
1 Park Plaza, Suite 580  
Irvine, CA 92614

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03/02/22 17:24:09 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: 12/15/21      Matter Name: Distribution  
 Proforma Number: 1149624  
 Client/Matter Joint Group # 375323-1      Client Matter Number:

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

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
09/15/21	8567768	Analyze and advise on issues regarding distribution of receivership funds and potential subordination of tax claims	Fates, Edward (Ted)	0.30	193.05	193.05	WO	HD	TR	_____
09/29/21	8584211	Several investor calls related to the distribution timing and follow-up as to next steps with IRS/subordination of distribution.	Zaro, David	0.40	334.80	527.85	WO	HD	TR	_____
10/06/21	8591749	Respond to inquiry from counsel for investor re: distributions	Fates, Edward (Ted)	0.20	128.70	656.55	WO	HD	TR	_____
11/16/21	8635919	Respond to investor inquiry re: status of distributions	Fates, Edward (Ted)	0.20	128.70	785.25	WO	HD	TR	_____
12/02/21	8663268	Conferences with investors and receiver related to distributions and possible alternative strategy.	Zaro, David	0.30	251.10	1,036.35	WO	HD	TR	_____

**Proforma Summary**

Timekeeper		Hours	Rate	Amounts
Number	Timekeeper			
000313	Zaro, David	0.70	837.00	585.90
001665	Fates, Edward (Ted)	0.70	643.50	450.45



03/02/22 17:24:09 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

**Proforma Summary**

**Timekeeper**

<b>Number</b>	<b>Timekeeper</b>	<b>Hours</b>	<b>Rate</b>	<b>Amounts</b>
		1.40		\$1,036.35
Subtotal Fees				\$1,036.35
Discount				0.00
Total Fees				1,036.35
Total Disbursements				0.00

**Attorney Billing Instructions**

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

**Billing Instructions**

expires 6/30/2022: 10% off standard rates (automatic); no text editing; copies @ .15

**Account Summary – As Of 03/02/22**

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,293.75	1,293.75	0.00	257.40	257.40	0.00	22,329.45	22,329.45	0.00
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	161.10	161.10	0.00
Billed	17,398.80	17,398.80	0.00	0.00	0.00	0.00	20,874.60	20,874.60	0.00
Collected	17,398.80	17,398.80	0.00	0.00	0.00	0.00	20,874.60	20,874.60	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>1,293.75</b>	<b>1,293.75</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**

03/02/22 17:24:09 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

Thomas A. Seaman, Receiver for US Fine Investment Arts Inc  
SEAMAN, THOMAS (Receiver)  
1 Park Plaza, Suite 580  
Irvine, CA 92614

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