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8 Legal Counsel in the Dominican Republic
for Receiver
9 Thomas A. Seaman

10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **WESTERN DIVISION**

14 SECURITIES AND EXCHANGE
COMMISSION,

15 Plaintiff,

16 v.

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

24 Defendants.
25

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

**THIRD INTERIM APPLICATION OF
SQUIRE PATTON BOGGS US LLP,
LOCAL COUNSEL IN THE
DOMINICAN REPUBLIC TO THE
RECEIVER, FOR PAYMENT OF
FEES AND REIMBURSEMENT OF
EXPENSES**

Date: January 8, 2018
Time: 9:00 a.m.
Ctm.: 850
Judge: Hon. R. Gary Klausner

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1 Squire Patton Boggs, US LLP ("SPB"), counsel to Thomas A. Seaman
2 ("Receiver") in the Dominican Republic, the Court-appointed permanent receiver for
3 Defendants USFIA, Inc., Alliance Financial Group, Inc., Amauction, Inc., Aborell
4 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 third interim application for approval and payment of fees and
9 reimbursement of expenses ("Application"). This Application covers the period from
10 February 1, 2017, through October 31, 2017 ("Third Application Period"), and seeks
11 approval of \$51,910.16 in fees and \$1,789.24 in expenses, and an order authorizing
12 the Receiver to pay the approved fees and expenses incurred.

13 **I. INTRODUCTION**

14 The Receivership Entities appear to have been operating in the Dominican
15 Republic by investing in real property with various mining activities, such as the
16 extraction of amber, managing several bank accounts with continuous money flow
17 and maintaining registries of the operating companies in public records. All these
18 actions are linked to the scheme at the heart of the action filed by the Securities and
19 Exchange Commission ("Commission"). The Receiver was appointed on a permanent
20 basis on October 6, 2015.

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

1 entities located in the Dominican Republic, engaged SPB’s Santo Domingo Office to
2 assist in having this Court's orders and the Receiver's appointment recognized by the
3 Dominican Republic courts and investigating potential assets of the Receivership
4 Entities located in the Dominican Republic.

5 This Application seeks interim approval and payment of \$51,910.16 in fees for
6 a total of 324.87 hours worked, which were mainly distributed between approaching
7 national public and private institutions (such as the Superintendence of Securities, the
8 Superintendence of Banks, the Ministry of Environmental Affairs, the Scotiabank and
9 BHD Leon, Banco Multiple, S.A.) and by the representation of the Receiver in the
10 court proceedings in the Dominican Republic regarding the Exequatur obtained in
11 regards to the Preliminary Injunction Order.

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

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

14 **1. Approach to National Public Institutions**

15 Due to the limited information found in the public records regarding the
16 operations of certain Receivership Entities in the Dominican Republic, SPB
17 approached some public institutions that have the possibility of providing
18 information regarding: (i) bank transactions and records; (ii) exportation of goods
19 (including precious stones); (iii) tax payments; (iv) potential issued licenses or
20 permits; and (v) identification of real property. While doing so, the SPB team met
21 with the Superintendent of Securities, the Superintendent of Banks, and the Ministry
22 of Environmental Affairs, respectively.

23 The meeting held with the Superintendent of Securities lead to a direct contact
24 between the Securities Exchange Commission (“SEC”), said institution, and the Bank
25 Superintendence. Because of the approach, SPB obtained information regarding the
26 real property with the Tax Authorities. In order to proceed with the asset recovery
27 regarding the Receivership Entities, SPB proceeded to investigate and determine all
28

1 established entities related to the Receivership Entities in the Dominican Republic,
2 including Ammine, S. R. L., Amn, S. R. L. and Natural Gem, S. R. L.

3 With respect to the mining operations, SPB met with the Ministry of
4 Environmental Affairs, the National Mining Authorities, and the Director of Amber
5 operations in the country. SPB discussed the current status of amber mining
6 operations and the perspective held by the Dominican government officials in regards
7 to the informality and lack of security which characterize said operation. The most
8 recent of these meetings was with the Ministry of Environmental Affairs, where SPB
9 discussed the current regulations applicable to mining operations and the lack of
10 permit issuances to the same. SPB concluded that the Ministry of Environmental
11 Affairs has little control over the amber mining operations, but are currently seeking
12 assistance from the National Mining Authorities to regulate the same.

13 SPB prepared a draft of a request for information to be executed by the SEC
14 and filed before the Superintendence of Banks, which was sent to the Receiver for
15 review and potential comments. This request should assist the Receiver in obtaining
16 detailed registries from banks of the Dominican Republic.

17 **2. Appeal for Annulment of Exequatur which Recognizes the**
18 **Preliminary Order**

19 After receiving a claim filed by Ammine, S.R.L. – represented by Mary Oliva
20 Alvarez Lam – seeking to annul the exequatur order granted in the Dominican
21 Republic in favor of the decision appointing the Receiver, SPB assumed the legal
22 representation of the Receiver (as instructed), researched all potential legal defense
23 strategies, discussed the same with the Receiver and the Attorneys of the Receiver,
24 participated in all three (3) hearings celebrated in regards to the matter, prepared lists
25 of exhibits, and executed a final explanatory brief of pleadings.

26 After the closing statements, the court took the matter under advisement and
27 SPB followed-up the issuance of the ruling. Upon issuance of the decision annulling
28

1 the Exequatur, SPB prepared report on next steps for the Receiver and the Attorneys
2 of the Receiver.

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

4 SPB requests the Court approve reimbursement of \$1,789.24 in out-of-pocket
5 costs. The itemization of such expenses is summarized below by category. The
6 majority of expenses incurred relate to legal translations of the exhibits,
7 notarizations, retrieval of counterparts exhibits, registration of documents and travel
8 expenses. See attached invoices for more details.

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

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

18 In allowing fees, a court should consider "the time, labor and skill required, but
19 not necessarily that actually expended, in the proper performance of the duties
20 imposed by the court upon the receiver [], the fair value of such time, labor and skill
21 measured by conservative business standards, the degree of activity, integrity and
22 dispatch with which the work is conducted and the result obtained." *United States v.*
23 *Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks
24 omitted). In practical terms, receiver and professional compensation thus ultimately
25 rests upon the result of an equitable, multi-factor balancing test involving the
26 "economy of administration, the burden that the estate may be able to bear, the amount
27 of time required, although not necessarily expended, and the overall value of the
28 services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F. 2d 232, 237 (3d Cir.

1 1970). Regardless of how this balancing test is formulated, no single factor is
2 determinative and "a reasonable fee is based [upon] all circumstances surrounding the
3 receivership." *SEC v. W.L. Moody & Co.*, Bankers (Unincorporated), 374 F. Supp.
4 465, 480 (S.D. Tex. 1974).

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

12 The Receiver promptly determined that experienced, qualified counsel was
13 necessary due to the size and complexity of the receivership estate and engaged SPB
14 pursuant to the authority granted to him in the TRO and PI Order. SPB has worked
15 diligently and efficiently to assist the Receiver in carrying out his Court-ordered
16 duties with respect to entities and potential assets located in the Dominican Republic.
17 The firm has submitted a detailed fee application which describes the nature of the
18 services rendered, and the identity and billing rate of each individual performing each
19 task. *See* Exhibit A.

20 SPB has endeavored to staff matters as efficiently as possible while remaining
21 cognizant of the complexity of issues presented. The request for fees is based on
22 SPB's customary billing rates charged for comparable services provided in other
23 matters. The work performed by SPB was essential to carrying out the Receiver's
24 Court-ordered duties. SPB has worked diligently to represent the Receiver's interest
25 before court, investigate the assets of the receivership estate and investigate sums
26 transferred to third parties in the Dominican Republic, and have reasonably reported
27 results to the Receiver. SPB's fees are fair and reasonable and should be approved
28 and paid.

1 **IV. CONCLUSION**

2 SPB, therefore, respectfully requests the Court enter an Order:

- 3 1. Approving SPB' fees of \$51,910.16;
- 4 2. Authorizing and directing the Receiver of approved fees, or
- 5 \$51,910.16, from the assets of the Receivership Entities;
- 6 3. Approving SPB' costs in the amount of \$1,789.24, and authorizing and
- 7 directing the Receiver to reimburse such costs in full; and
- 8 4. For such other and further relief as the Court deems appropriate.
- 9

10 Dated: December 6, 2017

SQUIRE PATTON BOGGS (US) LLP
Squire Patton Boggs, Peña Prieto Gamundi

11
12 By: 

CAROLINA SOTO
Attorneys for Receiver in the
Dominican Republic
THOMAS A. SEAMAN

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EXHIBIT A

SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI

Thomas Seaman Company
Mr. Thomas A. Seaman, CFA
3 Park Plaza
Suite 550
Irvine, California 92614

Invoice Number: 9893493
NCF: A010010010200006005
Invoice Date: 05/26/17
Matter Number: 115953.00001

Assets search related to litigation in CA

INVOICE SUMMARY

Fees:	USD\$ 21,048.65
Disbursements:	USD\$ 117.02
Amount Due for this Invoice:	USD\$ 21,165.67

PAYMENT INSTRUCTIONS

Remit Check Payments to:

Squire Patton Boggs (US) LLP
200 South Biscayne Blvd, 47th Floor
Miami, FL 33131
Phone: 305.577.7000
Fax: 305.577.7001

Remit Wire Payments to:

Citibank
ABA: 266086554 (WITHIN US)
SWIFT Code: CITIUS33 (INTERNATIONAL)
Account Name: Squire Patton Boggs (US) LLP,
International DR Operating Acct.
Account #: 3200718328
Reference: 9893493.115953

Direct Billing Inquiries to:

Carolina Soto Hernandez
Av. Pedro Henriquez Urena No. 157
La Esperilla
Santo Domingo
Dominican Republic
Phone: +1.809.472.4900
Fax: +1.809.472.4999
email: Carolina.Soto-
Hernandez@squirepb.com

Please Include Invoice Number with all Payments
Tax Identification Number RNC #101-79813-2

SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI

Thomas Seaman Company
Mr. Thomas A. Seaman, CFA
3 Park Plaza
Suite 550
Irvine, California 92614

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REMITTANCE COPY

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email: Carolina.Soto-
Hernandez@squirepb.com

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ASSETS SEARCH RELATED TO LITIGATION IN CA

LEGAL SERVICES

DATE	HOURS	TIMEKEEPER	NARRATIVE
02/01/17	0.80	E. Brache	Exchange email with C. Soto regarding information requests filed by the local Securities Superintendence before the Tax and Customs Authorities regarding Steve Chen and related entities and follow up on requests; discuss strategy for upcoming hearing.
02/02/17	0.90	C. Soto Hernandez	Follow up pending tasks and coordinate next steps with E. Brache; exchange of several emails; meet with the team..
02/03/17	1.20	C. Alvarez	Travel to and From the First Civil and Commercial Chamber of the Court of Appeals of the National District to verify if the counterpart had filed any motion/evidence on the case; report to C.Soto.
02/03/17	0.70	E. Brache	Telephone conference official from the Securities Superintendence to discuss and follow up on requests filed before the Tax and Customs Authorities, report to team and follow up; prepare list of pending tasks and task allocation and exchange of emails.
02/06/17	0.50	C. Soto Hernandez	Address several matters related to potential meeting with the Ministry of Environment; address matters vs upcoming hearing.
02/07/17	3.20	C. Soto Hernandez	Prepare for and attend meeting at ministry of environment.
02/08/17	2.00	E. Brache	Follow up on information requests filed by Superintendence of Securities with official and report to J. Marti and C. Soto; prepare for meeting with Ministry of Environment officials to discuss amber and larimar minign activities.
02/08/17	1.30	J. Marti	Legal research on regarding possibility of exercising a Subpoena to the BHD-Leon Bank.
02/09/17	4.00	E. Brache	Travel to and from the Ministry of Environment to attend meeting with officials and C. Soto; meet with C. Soto and J. Marti to discuss general strategy and instructions going forward.
02/09/17	2.50	J. Marti	Meet with C. Soto and E. Brache; discuss next steps and pending tasks; legal research on regarding possibility of exercising a Subpoena to the BHD-Leon Bank.
02/10/17	1.40	E. Brache	Receive and review change of domicile notification by Ammine's counsel; prepare preliminary report and update to client regarding our meeting with the Ministry of Environment officials.
02/15/17	0.30	E. Brache	Telephone conference and exchange email with Superintendence of Securities official to follow up on information requests filed before the Tax and Customs Authorities.

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02/16/17	0.40	E. Brache	Exchange emails with client and team to set conference call and prepare for it.
02/16/17	0.30	C. Soto Hernandez	Exchange of emails on pending tasks.
02/17/17	1.20	C. Alvarez	Travel to and From the First Civil and Commercial Chamber of the Court of Appeals of the National District; verify if the counterpart had filed any motion/file on the case; report to C.Soto.
02/20/17	5.50	E. Brache	Discuss instructions from C. Soto to attend first hearing regarding Ammine's Appeals Claim and prepare written final pleadings; work on written final pleadings and conduct necessary legal research; research funds granted by President of the Dominican Republic to amber and larimar miners and report to C. Soto and J. Marti; prepare list of exhibits we would like to file in support of Thomas Seaman's arguments that we will need from client.
02/20/17	1.00	L. Hernandez	Discuss with C. Soto strategy for hearing; prepare with E. Brache for hearing.
02/20/17	1.10	C. Soto Hernandez	Coordinate hearing strategy for tomorrow's hearing; review pleadings brief; meeting to discuss the same.
02/21/17	3.20	E. Brache	Attend hearing; discuss preliminary report to C. Soto; prepare appointments for next hearing and term granted by the tribunal to parties to file exhibits; prepare report for client, receive C. Soto's comment and report to client; exchange email with T. Seaman regarding representatives of Ammine.
02/21/17	2.00	L. Hernandez	Attend first hearing and report to C. Soto.
02/21/17	3.10	J. Marti	Continue legal research on regarding possibility of exercising a Subpoena to the BHD-Leon Bank. work on draft of report regarding possibility of exercising a Subpoena to the BHD-Leon Bank.
02/22/17	3.30	J. Marti	Complete report regarding the investigation regarding possibility of exercising a Subpoena to the BHD-Leon Bank; report to C. Soto and E. Brache.
02/22/17	2.60	C. Soto Hernandez	Exchange of emails on Ammines' filings, and coordinate next steps in connection to the same; address several matters on same; send reviewed report; respond.
02/23/17	5.30	E. Brache	Review exhibits filed by Ammine; work on report to client regarding exhibits filed by Ammine and their strategy with said exhibits, exhibits that we will need to obtain from client, revise and insert J. Marti's report on the possibility of subpoenaing the BHD Bank in general update report; email Securities Superintendence official to follow up on information request filed before the Customs and Tax authorities; review local newspapers for any publications by

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Invoice Number: 9893493

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Ammine, Amn or Natural Gem.

02/23/17	1.70	J. Marti	Preliminary review of T. Seaman's deposition regarding SEC's case against S. Chen filed by the DR legal counsel of M. Alvarez Lahm.
02/24/17	1.50	E. Brache	Discuss Thomas Seaman's Deposition filed by Ammine as exhibit with J. Marti and give instructions to prepare list of statements Ammine will most likely use in their defense; discuss with C. Soto strategy and exhibits we will file in support of our arguments; continue working on general update report to client and send to C. Soto for her review.
02/24/17	6.80	J. Marti	Complete review of T. Seaman's deposition regarding SEC's case against S. Chen filed by the DR legal counsel of M. Alvarez Lahm and other evidence filed by Ammine.
02/24/17	1.00	C. Soto Hernandez	Meet with E. Brache and J. Marti regarding next steps and pending tasks vs. exhibits filed by Ammine; revise report for the client, prepared by E. Brache and J. Marti; address other several matters regarding the same.
02/26/17	0.50	E. Brache	Receive C. Soto's corrections and suggestions on report to client regarding Ammine's appeal claim, include suggestions and send to client.
02/28/17	2.17	E. Brache	Prepare for conference call, participate in conference call with T. Seaman, A. Juroe, A. Schoor and SPB team to discuss strategy and exhibits to be filed as a result of Ammine's appeal claim; prepare list of pending tasks discussed in conference call and report to client and SPB team.
02/28/17	4.10	J. Marti	Prepare for conference with T. Seaman et al; attend conference call with T. Seaman et al; discuss next steps and pending task with C. Soto and E. Brache; work on table including excerpts from the deposition where Mr. Seaman may reply certain statements that the opposing counsel may use in support to their arguments; report to E. Brache and C. Soto.
02/28/17	1.50	C. Soto Hernandez	Address several matters on pending tasks; prepare for and attend call with client; exchange of further emails.
03/01/17	2.00	E. Brache	Receive, analyze and revise table prepared by J. Marti regarding statements made in Deposition we believe Ammine will use in its defense, report suggestions to J. Marti and telephone conference to discuss same; give instructions to J. Marti to confirm that we do not have copy of checks issued by Ammine from its Scotiabank account from Oct 2013 = May 2014 (as requested by A. Juroe) and to request to Scotiabank official.
03/01/17	2.30	J. Marti	Receive comments to the table including excerpts from the deposition where Mr. Seaman may reply certain statements that the opposing counsel may use in support to their arguments from E. Brache; apply changes; work on Fee Application for November through January regarding Thomas Seaman; report Fee Application and Table including excerpts to T. Seaman et al.

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03/02/17	0.60	C. Soto Hernandez	Address several matters related to pending actions to obtain information from the authorities and banks, and Ammine's claim for annulment of exequatur; exchange of emails on same; follow upon the meeting with the legal director of the Superintendence of Banks.
03/03/17	1.10	C. Alvarez	Travel to and From the First Civil and Commercial Chamber of the Court of Appeals of the National District; verify if the counterpart had filed any motion/file on the case; report to C.Soto.
03/03/17	1.30	E. Brache	Receive and review documents send by A. Juroe regarding link between USFIA / Amauction and Ammine, SRL and exchange email with official translator requesting that she translate said documents to spanish; discuss with C. Soto and J. Marti other possible exhibits that we may file as proof between the link between the Receivership Entities and Ammine and prepare a report to client requesting that T. Seaman contact Scotiabank official to obtain copy of certain bank documents; discuss with C. Soto possibility of requesting personal appearance of Mary Oliva Alvarez Lam to court proceedings and give instructions to J. Marti to investigate local court criteria to order personal appearance of shareholders and managers of local entities.
03/03/17	0.70	J. Marti	Request the Scotiabank bank statements for 2013 regarding Ammine's account; report to Alison Juroe; legal research on required elements for M. O. Alvarez Lahm.
03/03/17	0.70	C. Soto Hernandez	Discuss status of pending tasks with E. Brache; review general report prepared by E. Brache and exchange of emails on same; review and respond email from client; review and revise email for Scotiabank requesting further information (as per request of T. Seaman).
03/06/17	0.70	E. Brache	Exchange emails with A. Schoor regarding affidavits on Californian law to be filed as exhibits in view of Ammine's appeals claim and deadline to file said affidavits; prepare reminder to follow up on the check request to Scotiabank officials in view of A. Juroe's request; exchange emails with research assistant regarding her investigation on the personal appearance of company representatives (Mary Oliva Alvarez Lam) as witnesses in local judicial proceedings.
03/06/17	0.30	C. Soto Hernandez	Review exchange of emails; discuss certain pending tasks with E. Brache vs. next hearing.
03/07/17	0.40	E. Brache	Conference call with research assistant regarding preliminary report on her investigation on the personal appearance of company representatives as witnesses; receive email from A. Schoor requesting that we have a conference call to discuss updates and strategy going forward; telephone conference with C. Soto and J. Marti to discuss the same.
03/08/17	0.30	E. Brache	Review emails from research assistant containing report regarding personal appearance of company representatives and J. Marti's email on same.
03/09/17	0.30	J. Marti	Follow up on request of bank statements with Scotiabank representatives.

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03/10/17	1.20	E. Brache	Exchange email with official translator regarding translation of exhibits linking Ammine to Steve Chen; receive additional documents from A. Juroe, discuss contents with C. Soto and J. Marti and give instructions to J. Marti to review carefully and determine which we will file as exhibits as a result of Ammine's appeals claim; exchange email with A. Schoor indicating that any exhibits filed must be accompanied by a spanish translation including the affidavits and requesting she forward us a copy of the affidavits before proceeding with the notary public's legalization and apostille so that we can coordinate their translation.
03/13/17	0.30	E. Brache	Exchange email with official translator and SPB team regarding her availability to translate of documents linking Ammine and Steve Chen; give instructions to J. Marti to contact another official translator and request a quote for the translation of the documents.
03/13/17	0.60	J. Marti	Request quote for translation of bank statements and USFIA forensic accounting report; investigate CA counsel used by SPB for affidavit in past proceedings; report to C. Soto.
03/13/17	0.50	C. Soto Hernandez	Review and discuss with E. Brache last evidence received from client (linking of Chen with Ammine) vs. evidence filed by counterpart; coordinate pending tasks and next steps.
03/14/17	0.50	E. Brache	Attention to J. Marti's email regarding quote issued by official translator for translation of documents to be filed as a result of Ammine's appeals claim against the Preliminary Injunction's Exequatur; conference call with Superintendence of Securities official regarding our information request, agree to meet to discuss findings, and exchange emails on same with C. Soto.
03/14/17	0.40	J. Marti	Request for approval for translation of Amauction and USFIA's bank statements issued by the Bank of America to A. Schoor; follow up on request of check information to Scotiabank from october 2013 to may 2014.
03/15/17	1.20	E. Brache	Follow up on request to meet with legal director of Superintendence of Banks; prepare for and participate in conference call; discuss task allocation with C. Soto and J. Marti going forward.
03/15/17	0.90	J. Marti	Conference call with T. Seaman et al; discuss pending task in regards to claim requesting annulment of exequatur; discuss production of evidence regarding receivership entities and Ammine.
03/15/17	1.10	C. Soto Hernandez	Prepare for and attend conference call; address several matters related to pending tasks; meet with E. Brache and J. Marti on same; exchange of emails.
03/16/17	1.00	E. Brache	Confirm name of legal director of Superintendence of Banks and exchange emails with C. Soto regarding meeting with legal director; conference call Superintendence of Securities official and coordinate meeting to discuss findings obtained before the Tax Authorities; discuss

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instructions with C. Soto, identify and send outline of Ammine's arguments in appeals claim against the Exequatur and T. Seaman's counterarguments.

03/16/17	0.30	C. Soto Hernandez	Exchange of emails on pending tasks.
03/17/17	1.70	E. Brache	Prepare for and travel to and from Superintendence of Banks with C. Soto to meet with legal consultant to discuss requisites and procedure to cooperate with the SEC regarding the local entities controlled by Steve Chen and receive instructions from C. Soto to prepare report to client; meet with internal team and briefly discuss status of case and pending issues.
03/17/17	2.60	C. Soto Hernandez	Prepare for and attend meeting with general counsel for the Superintendence of Banks and E. Brache; coordinate next steps in connection to same.
03/20/17	3.50	E. Brache	Work on report for client with quote going forward and case updates and send to C. Soto for her review; review documents of US proceeding's send by T. Fates and discuss with C. Soto and J. Marti.
03/20/17	1.20	C. Soto Hernandez	Review and respond emails with documents regarding proceedings in California, received from T. Fates; discuss the same with E. Brache.
03/21/17	3.20	J. Marti	Further legal research regarding personal appearance of Ammine by the means of one of its legal representatives; work on draft of report personal appearance of Ammine by the means of one of its legal representatives; follow up on request of check information to Scotiabank from october 2013 to may 2014; review and analyze pamphlets and other USFIA marketing materials sent by A. Juroe to SPB counsel and the potential use of the same as evidence in the appeal claim against the exequatur.
03/22/17	0.30	C. Soto Hernandez	Address several matters on pending tasks.
03/23/17	3.00	E. Brache	Prepare for and attend meeting with Superintendence of Securities officials to discuss informations obtained before the Tax Authorities, discuss with C. Soto and J. Marti and give instructions to J. Marti to confirm if properties registered before the Tax Authorities are the same ones we know of in Hato Mayor; investigate links online between USFIA and Ammine to use as evidence in Ammine's appeals claim and report to C. Soto and J. Marti; review local newspapers for any publications by Ammine, Amn or Natural Gem; revise J. Marti's report on personal appearance request of company representatives as is Mary Oliva Alvarez Lam and discuss with . Marti.
03/23/17	0.40	J. Marti	Review information found at the Superintendence of Securities regarding properties in favor of Ammine; compare with previous information in our files; report to E. Brache.
03/23/17	3.10	C. Soto Hernandez	Travel to, prepare for and attend meeting with counsel for the Superintendence of Securities

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and E. Brache; review information on taxes paid by Ammine et al; instruct E. Brache on next steps vs. information obtained; review and revise general updated report prepared by E. Brache.

03/24/17	1.20	C. Alvarez	Travel to and From the First Civil and Commercial Chamber of the Court of Appeals of the National District; verify if the counterpart had filed any motion/file on the case; report to C.Soto.
03/24/17	1.50	E. Brache	Per C. Soto's instructions, include information obtained in meeting with Superintendence of Securities officials in quote and update of case status to client and send to C. Soto for her review; review additional information and checks sent by Scotiabank officials; revise J. Marti's report to client regarding additional information and checks sent by Scotiabank; investigate if Amn, Ammine and Natural Gem owe any property taxes to the Tax Authorities and discuss with J. Marti.
03/24/17	1.30	J. Marti	Include suggestions received to the general report; wollow up on Scotiabank's remittance of bank statements; receive and review statements; report to A. Schoor.
03/26/17	0.80	C. Soto Hernandez	Review, analyze, revise and send further suggestions to general report for client.
03/27/17	0.60	E. Brache	Review and include C. Soto's suggestions to quote and case update and email to client.
03/27/17	0.90	J. Marti	Work on new version of personal appearance report.
03/27/17	0.20	C. Soto Hernandez	Review final version of general updated report prepared by E. Brache.
03/28/17	1.00	E. Brache	Exchange emails with A. Schoor and C. Soto regarding quote and case update to client; review latest version of J. Marti's report on the legality of the personal appearance of company representatives (as is Mary Oliva Alvarez Lam) in judicial proceedings; discuss with C. Soto and exchange emails with private investigator requesting quote to investigate amount of monies in Ammine's bank account in BHD Leon bank.
03/29/17	1.00	E. Brache	Exchange emails with private investigator regarding Ammine's bank account in BHD Leon bank; receive private investigators report that there are no funds in bank account; attention to T. Fates email regarding his availability for the conference call and view on the case; attention to email exchange between C. Soto and A. Schoor regarding investigators report; exchange email with T. Seaman regarding his availability to set up a conference call to discuss latest updates and strategy of case going forward.
04/05/17	1.10	E. Brache	Prepare for and participate in conference call with client and internal SPB team; discuss task allocation and due dates with C. Soto and J. Marti; exchange of several emails on same.

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Thomas Seaman Company / Assets search related to litigation in CA

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04/05/17	0.90	J. Marti	Preparation for conference call with SPB team and Thomas Seaman Company team; attend conference call; follow up on Scotiabank regarding the remittance of checks from 2013;
04/05/17	1.00	C. Soto Hernandez	Address several matters regarding pending tasks.
04/06/17	1.20	C. Alvarez	Travel to and From the First Civil and Commercial Chamber of the Court of Appeals of the National District; verify if the counterpart had filed any motion/file on the case; report to C.Soto.
04/06/17	0.40	C. Soto Hernandez	Exchange of emails with J. Marti and E. Brache regarding motion to be filed with the Superintendence of Banks; and address several matter in regards to same.
04/12/17	0.20	J. Marti	Follow up on Scotiabank regarding the remittance of checks from 2013.
04/17/17	4.50	E. Brache	Work on cooperation and information request to be send by Mr. Seaman to the Superintendence of Banks regarding Ammine SRL's account in BHD Leon Bank and report to (i) J. Marti so that he may include proof of link between Ammine and Entity Defendants and (ii) C. Soto for her review and approval.
04/17/17	1.10	J. Marti	Assist E. Brache with motion addressed to the Bank Superintendence requesting assistance with obtaining bank records from the BHD Leon Bank.
04/17/17	0.60	C. Soto Hernandez	Exchange of emails on motion for the Superintendence of Banks; revise the same; conference call with E. Brache coordinating certain matters in connection to same.
04/18/17	1.30	E. Brache	Receive and review J. Marti's insertion to the cooperation and information request to be send by Mr. Seaman to the Superintendence of Banks and report comments to J. Marti and C. Soto; exchange emails with J. Marti and C Soto regarding request; receive new checks from Scotiabank official and give instructions to J. Marti to review and send to client.
04/18/17	5.40	J. Marti	Assist E. Brache with motion addressed to the Bank Superintendence requesting assistance with obtaining bank records from the BHD Leon Bank; draft email to A. Schoor, A. Juroe and T. Seaman including draft of motion and annexes; receive bank statements and copies of checks issued by Ammine's account from Scotiabank for the year 2013; prepare draft of email to A. Schoor, A. Juroe and T. Seaman including said bank statements and checks.
04/19/17	0.20	J. Marti	Draft email to A. Schoor, A. Juroe and T. Seaman confirming receipt of the motion to be filed before the Bank Superintendence.
04/26/17	0.40	J. Marti	Review questions from A. Schoor regarding motion to be filed before the Bank Superintendence; discuss with C. Soto; prepare draft of response; reply to A. Schoor et al.

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05/26/17 Thomas Seaman Company / Assets search related to litigation in CA
 Page 9 Invoice Number: 9893493
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04/26/17 0.20 C. Soto Hernandez Review email from client; review and revise draft of response prepared by J. Marti.
 04/28/17 1.20 C. Alvarez Travel to and From the First Civil and Commercial Chamber of the Court of Appeals of the National District; verify if the counterpart had filed any motion/file on the case; report to C.Soto.

TOTAL HOURS FOR THIS MATTER: 132.97

TOTAL SERVICES: USD\$ 21,048.65

TIME SUMMARY

TIMEKEEPER	HOURLY RATE	HOURS	TOTAL
Carla Alvarez	75.00	7.10	532.50
Eugenia Brache	145.00	55.87	8,101.15
Laura Hernandez	180.00	3.00	540.00
Josue Marti	125.00	42.00	5,250.00
Carolina Soto Hernandez	265.00	25.00	6,625.00
TOTAL SERVICES:		132.97	USD\$ 21,048.65

DISBURSEMENT SUMMARY

Delivery Services	VENDOR: Santo Domingo - DOP Only INVOICE#: 76079_04252017 DATE: 4/25/2017 Cash Detail Santo Domingo 201704 - Tran Date 3/30/2017 - FedEx - package invoice 389065 -Sort line 220 - DOP 1774.42	37.60
Printing/Duplicating - Outside	VENDOR: Santo Domingo - DOP Only INVOICE#: 76079_04252017 DATE: 4/25/2017 Cash Detail Santo Domingo 201704 - Tran Date 3/21/2017 - Take copies of an inventory of documents filed by the counterpart -Sort line 181 - DOP 276	5.85
Travel	VENDOR: Santo Domingo - DOP Only INVOICE#: 76079_04252017 DATE:	4.24

SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI

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05/26/17

Thomas Seaman Company / Assets search related to litigation in CA

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Invoice Number: 9893493

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4/25/2017

Cash Detail Santo Domingo 201704 - Tran Date 4/04/2017 - Carla Alvarez - travel to and from the first civil and commercial chamber of the court of appeals from the national district to follow up the file case -Sort line 552 - DOP 200

Travel

VENDOR: Santo Domingo - DOP Only INVOICE#: 76079_04252017 DATE: 4/25/2017 3.18

Cash Detail Santo Domingo 201704 - Tran Date 4/04/2017 - Travel to and from the First Civil and Commercial Chamber of the Court of Appeals in order to retrieve an inventory of documents filed by the couterpart -Sort line 557 - DOP 150

Telephone

66.15

TOTAL DISBURSEMENTS:

USD\$ 117.02

MATTER TOTAL

TOTAL SERVICES:

USD\$ 21,048.65

TOTAL DISBURSEMENTS:

USD\$ 117.02

TOTAL AMOUNT DUE FOR THIS MATTER:

USD\$ 21,165.67

SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI

Thomas Seaman Company
Mr. Thomas A. Seaman, CFA
3 Park Plaza
Suite 550
Irvine, California 92614

Invoice Number: 9897191
NCF: A010010010200006071
Invoice Date: 06/12/17
Matter Number: 115953.00001

Assets search related to litigation in CA

INVOICE SUMMARY

Fees:	USD\$ 6,166.50
Disbursements:	USD\$ 22.75
Amount Due for this Invoice:	USD\$ 6,189.25
Previous Invoices Outstanding as of the Date of this Invoice:	USD\$ 21,165.67
TOTAL (INCLUDING OUTSTANDING INVOICES):	USD\$ 27,354.92

PAYMENT INSTRUCTIONS

Remit Check Payments to:

Squire Patton Boggs (US) LLP
200 South Biscayne Blvd, 47th Floor
Miami, FL 33131
Phone: 305.577.7000
Fax: 305.577.7001

Remit Wire Payments to:

Citibank
ABA: 266086554 (WITHIN US)
SWIFT Code: CITIUS33 (INTERNATIONAL)
Account Name: Squire Patton Boggs (US) LLP,
International DR Operating Acct.
Account #: 3200718328
Reference: 9897191.115953

Direct Billing Inquiries to:

Carolina Soto Hernandez
Av. Pedro Henriquez Urena No. 157
La Esperilla
Santo Domingo
Dominican Republic
Phone: +1.809.472.4900
Fax: +1.809.472.4999
email: Carolina.Soto-
Hernandez@squirepb.com

Please Include Invoice Number with all Payments

Tax Identification Number RNC #101-79813-2

SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI

Thomas Seaman Company
Mr. Thomas A. Seaman, CFA
3 Park Plaza
Suite 550
Irvine, California 92614

Invoice Number: 9897191
NCF: A010010010200006071
Invoice Date: 06/12/17
Matter Number: 115953.00001

REMITTANCE COPY

Assets search related to litigation in CA

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Hernandez@squirepb.com

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115953.00001

06/12/17

Thomas Seaman Company / Assets search related to litigation in CA

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Invoice Number: 9897191

NCF: A010010010200006071

ASSETS SEARCH RELATED TO LITIGATION IN CA

LEGAL SERVICES

DATE	HOURS	TIMEKEEPER	NARRATIVE
03/30/17	0.20	C. Soto Hernandez	Exchange of several emails on pending tasks.
04/18/17	0.20	C. Soto Hernandez	Review emails regarding additional information requested to Scotiabank.
05/02/17	0.20	E. Brache	Discuss with J. Marti current status of case and give instructions to follow up on the draft of the cooperation and information request to the Superintendence of Banks sent to client.
05/04/17	1.30	E. Brache	Meet with C. Soto to discuss possible strategy for next hearing; prepare email to T. Seaman asking for his approval to file documents and to request M. Alvarez Lam personal appearance to the proceedings.
05/04/17	0.60	C. Soto Hernandez	Discuss strategy for next hearing with E. Brache; instruct E. Brache.
05/05/17	0.60	C. Alvarez	Travel to and From the First Civil and Commercial Chamber of the Court of Appeals of the National District to verify if the counterpart had filed any motion/file on the case; report to C.Soto.
05/09/17	0.40	E. Brache	Meet with C. Soto, discuss status of case and receive instructions to prepare conference call with client; email client requesting conference call and prepare appointment with dial in details.
05/09/17	0.20	C. Soto Hernandez	Discuss next steps and status of case; instruct E. Brache.
05/10/17	1.00	E. Brache	Conference call with C. Soto to discuss hearing strategy and receive instructions to contact opposing counsel and indicate that we will be filing exhibits; prepare for and participate in conference call with A. Schoor, C. Soto and J. Marti to discuss case strategy for hearing and next steps.
05/10/17	0.30	J. Marti	Prepare for conference call; attend conference call with A. Schoor, E. Brache and C. Soto.
05/11/17	1.50	E. Brache	Conference call with J. Marti to discuss all exhibits that we will file in support of our arguments and confirm with C. Soto; prepare email to T. Seaman requesting his approval to file said exhibits in docket, translate other documents and file as exhibits and his comments on the cooperation letter to Superintendence of Banks.
05/11/17	0.50	J. Marti	Assist E. Brache with list of exhibits to be filed before the appeal claim filed against the exequatur by Ammine.

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06/12/17

Thomas Seaman Company / Assets search related to litigation in CA

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05/12/17	1.10	C. Alvarez	Travel to and From the First Civil and Commercial Chamber of the Court of Appeals of the National District to verify if the counterpart had filed any motion/file on the case; report to C.Soto.
05/12/17	4.00	E. Brache	Prepare exhibit list to be filed before the Civil and Commercial tribunal, identify exhibits and coordinate their printing; send exhibit list to J. Marti so that he may include certain missing information; prepare bailiff act to notify filing of exhibits to opposing counsel; conference call with bailiff and give instructions to notify exhibits; review and respond T. Seaman's email approving the filing of the exhibits; give instructions to J. Marti to coordinate translation of documents in english to be file as exhibits.
05/12/17	4.10	J. Marti	Work on list of exhibits to be filed before the appeal claim filed against the exequatur by Ammine; organize documents to be filed; travel to and from the Civil and Comercial Chamber of the Court of First Instance; file list of exhibits; review notification of list of exhibits; send final draft to L. Hernandez; coordinate filing of notification.
05/15/17	3.00	E. Brache	Exchange emails with C. Soto and J. Marti regarding exhibits to be filed before the Civil and Commercial Court of Appeals of the National District; receive instructions from C. Soto and email T. Seaman to confirm that the Bank of America wire transfer statements are of public record in US courts; ; give instructions to J. Marti to file USFIA pamphlets in english as exhibits; meet with C. Soto to discuss hearing strategy and receive instructions to update pleadings; update pleadings and send for C. Soto's review, receive corrections and include, prepare copies of pleadings; conference call with L. Hernandez to discuss hearing and strategy.
05/15/17	2.20	J. Marti	Work on additional list of exhibits; prepare exhibits for filing; prepare physical file for hearing regarding appeal claim filed by Ammine against T. Seaman.
05/15/17	3.30	C. Soto Hernandez	Exchange of emails regarding evidence; review and analyze evidence filed with the docket vs. pleadings of Ammine's claim; discuss with E. Brache strategy for tomorrow's hearing; review and revise brief of pleadings for the hearing; legal research on certain provisions of Law 544; exchange of emails; conference call with E. Brache.
05/16/17	4.20	E. Brache	Attend second hearing of Ammine's appeals claim against the Exequatur granted to the Preliminary Order; deliver preliminary report to C. Soto and J. Marti; prepare reminders for third hearing and due date to file additional exhibits; exchange emails with A. Schoor and T. Seaman regarding the details of the second hearing and the filing of the Bank of America wire transfer statements form USFIA to Ammine.
05/16/17	0.40	J. Marti	Coordinate translation of promotional pamphlets; email exchange with translator.
05/18/17	1.50	E. Brache	Exchange emails with C. Soto regarding budget requested by client; exchange emails with C.

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Soto, A. Schoor and T. Seaman regarding filing of Bank of America USFIA wire transfer statements as exhibits before DR courts; give instructions to J. Marti to coordinate spanish translation of bank statements.

05/18/17	0.30	J. Marti	Email exchange with translator in order to coordinate translation of bank statements.
05/18/17	0.20	C. Soto Hernandez	Exchange emails with E. Brache re budget requested by client; exchange emails with A. Schoor and T. Seaman.
05/19/17	0.20	E. Brache	Attention to law clerks email indicating that Ammine has not filed any new exhibits before the docket pertaining to its claim against the exequatur granted to the Preliminary Order.
05/22/17	0.30	E. Brache	Exchange emails with official translator regarding translation of Bank of America wire transfer statements and give instructions to J. Marti to review translation.
05/24/17	4.10	J. Marti	Review final translations of promotional documents and bank statements; send comments to translator; work on additional list of exhibits.
05/25/17	2.10	J. Marti	Work on additional list of exhibits; prepare final draft; send final draft to E.Brache; work on preparation of exhibits.
05/26/17	1.10	C. Alvarez	Travel to and From the First Civil and Commercial Chamber of the Court of Appeals of the National District to verify if the counterpart had filed any motion/file on the case; report to C.Soto.
05/26/17	0.70	E. Brache	Revise exhibit list prepared by J. Marti to be filed before the Civil and Commercial Chamber of the Court of Appeals of the National District regarding the Bank of America wire transfer statements of USFIA and report suggestions to J. Marti.
05/26/17	0.60	J. Marti	Assist E.Brache with list of exhibits; review final version of list of exhibits; coordinate filling before docket of appeal claim filed by Ammine against Thomas Seaman.
05/29/17	0.40	E. Brache	Meet with C. Soto to discuss case strategy going forward; conference call with J. Marti to confirm that Ammine has not filed any new exhibits before the corresponding tribunal.
05/29/17	0.20	J. Marti	Review filed list of exhibits; digital and physical file; report to C. Soto.
05/29/17	0.20	C. Soto Hernandez	Discuss with E. Brache case strategy.
05/30/17	0.30	E. Brache	Meet with C. Soto and discuss option to request the personal appearance of Mary Oliva Alvarez Lam during the next hearing.

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05/30/17 0.20 C. Soto Hernandez Discuss pending tasks with E. Brache and strategy for next hearing.

TOTAL HOURS FOR THIS MATTER: 41.70

TOTAL SERVICES: USD\$ 6,166.50

TIME SUMMARY

TIMEKEEPER	HOURLY RATE	HOURS	TOTAL
Carla Alvarez	75.00	2.80	210.00
Eugenia Brache	145.00	19.00	2,755.00
Josue Marti	125.00	14.80	1,850.00
Carolina Soto Hernandez	265.00	5.10	1,351.50
TOTAL SERVICES:		41.70	USD\$ 6,166.50

DISBURSEMENT SUMMARY

Telephone	22.75
TOTAL DISBURSEMENTS:	USD\$ 22.75

MATTER TOTAL

TOTAL SERVICES:	USD\$ 6,166.50
TOTAL DISBURSEMENTS:	USD\$ 22.75
TOTAL AMOUNT DUE FOR THIS MATTER:	USD\$ 6,189.25

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06/12/17

Thomas Seaman Company / Assets search related to litigation in CA

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Invoice Number: 9897191

NCF: A010010010200006071

SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI

Thomas Seaman Company
Mr. Thomas A. Seaman, CFA
3 Park Plaza
Suite 550
Irvine, California 92614

Invoice Number: 9937524
NCF: A010010010200006383
Invoice Date: 11/08/17
Matter Number: 115953.00001

Assets search related to litigation in CA

INVOICE SUMMARY

Fees:	USD\$ 22,766.00
Disbursements:	USD\$ 1,789.24
Amount Due for this Invoice:	USD\$ 24,555.24
Previous Invoices Outstanding as of the Date of this Invoice:	USD\$ 27,354.92
TOTAL (INCLUDING OUTSTANDING INVOICES):	USD\$ 51,910.16

PAYMENT INSTRUCTIONS

Remit Check Payments to:

Squire Patton Boggs (US) LLP
200 South Biscayne Blvd, 47th Floor
Miami, FL 33131
Phone: 305.577.7000
Fax: 305.577.7001

Remit Wire Payments to:

Citibank
ABA: 266086554 (WITHIN US)
SWIFT Code: CITIUS33 (INTERNATIONAL)
Account Name: Squire Patton Boggs (US) LLP,
International DR Operating Acct.
Account #: 3200718328
Reference: 9937524.115953

Direct Billing Inquiries to:

Carolina Soto Hernandez
Av. Pedro Henriquez Urena No. 157
La Esperilla
Santo Domingo
Dominican Republic
Phone: +1.809.472.4900
Fax: +1.809.472.4999
email: Carolina.Soto-
Hernandez@squirepb.com

Please Include Invoice Number with all Payments

Tax Identification Number RNC #101-79813-2

SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI

Thomas Seaman Company
Mr. Thomas A. Seaman, CFA
3 Park Plaza
Suite 550
Irvine, California 92614

Invoice Number: 9937524
NCF: A010010010200006383
Invoice Date: 11/08/17
Matter Number: 115953.00001

REMITTANCE COPY

Assets search related to litigation in CA

INVOICE SUMMARY

Fees:	USD\$ 22,766.00
Disbursements:	USD\$ 1,789.24
Amount Due for this Invoice:	USD\$ 24,555.24
Previous Invoices Outstanding as of the Date of this Invoice:	USD\$ 27,354.92
TOTAL (INCLUDING OUTSTANDING INVOICES):	USD\$ 51,910.16

PAYMENT INSTRUCTIONS

Remit Check Payments to:

Squire Patton Boggs (US) LLP
200 South Biscayne Blvd, 47th Floor
Miami, FL 33131
Phone: 305.577.7000
Fax: 305.577.7001

Remit Wire Payments to:

Citibank
ABA: 266086554 (WITHIN US)
SWIFT Code: CITIUS33
(INTERNATIONAL)
Account Name: Squire Patton Boggs (US)
LLP,
International DR Operating Acct.
Account #: 3200718328
Reference: 9937524.115953

Direct Billing Inquiries to:

Carolina Soto Hernandez
Av. Pedro Henriquez Urena No. 157
La Esperilla
Santo Domingo
Dominican Republic
Phone: +1.809.472.4900
Fax: +1.809.472.4999
email: Carolina.Soto-
Hernandez@squirepb.com

Please Include Invoice Number with all Payments

Tax Identification Number RNC #101-79813-2

SQUIRE PATTON BOGGS PEÑA PRIETO GAMUNDI

115953.00001

11/08/17

Thomas Seaman Company / Assets search related to litigation in CA

Page 1

Invoice Number: 9937524

NCF: A010010010200006383

ASSETS SEARCH RELATED TO LITIGATION IN CA

LEGAL SERVICES

DATE	HOURS	TIMEKEEPER	NARRATIVE
05/09/17	0.50	C. Soto Hernandez	Exchange of several emails regarding pending tasks; meeting to discuss next steps.
05/24/17	1.00	C. Alvarez	Travel to and from the First Civil and Commercial Chamber of the Court of Appeals to file exhibits; report to C.Soto.
05/24/17	0.80	C. Soto Hernandez	Review reports; follow up on pending tasks; instruct E. Brache.
06/05/17	1.20	C. Alvarez	Travel to and From the First Civil and Commercial Chamber of the Court of Appeals of the National District to verify if the counterpart had filed any new evidence on the case; report to C.Soto.
06/08/17	0.20	E. Brache	Attention to law clerks report on the status of the docket relating to Ammine's claim filed against Exequatur.
06/13/17	0.30	E. Brache	Meet with law clerk and give instructions to follow up on the case docket before the third hearing.
06/23/17	1.50	C. Alvarez	Travel to and From the First Civil and Commercial Chamber of the Court of Appeals of the National District to verify if the counterpart had filed any motion/file on the case; report to C.Soto.
06/27/17	1.50	E. Brache	Exchange emails with C. Soto regarding final hearing; update pleadings to be filed during hearing and organize copies; meet with C. Soto to discuss hearing strategy; email law clerk's to confirm that opposing counsel has not filed any new evidence; attention to emails between C. Soto and T. Fates.
06/27/17	1.20	C. Soto Hernandez	Prepare for attend final trial before the court of appeals; discuss hearing strategy with E. Brache; exchange of emails.
06/28/17	4.00	E. Brache	Continue preparing for hearing; attend hearing with C. Soto; file hearing pleadings before clerk of the court; prepare calendar appointments with deadlines granted by tribunal; report to client; coordinate internal meeting to discuss final explanatory pleadings brief.
06/28/17	3.40	C. Soto Hernandez	Travel to the court of appeals; attend final hearing; coordinate next steps; exchange of emails.
06/30/17	1.50	E. Brache	Prepare for and meet with C. Soto and J. Marti to discuss outline and defenses of final explanatory brief; give instructions to research assistant to investigate treaties.
06/30/17	1.40	J. Marti	Meet with C. Soto and E. Brache; discuss strategy for final explanatory brief of pleadings regarding appeal claim against exequatur.

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06/30/17	0.30	C. Soto Hernandez	Exchange of emails on pending tasks; meeting regarding certain defense arguments for final memorial.
07/03/17	0.40	E. Brache	Meet with J. Marti to discuss final brief of pleadings and allocation of arguments to be developed; attention to C. Soto's email to client.
07/03/17	0.30	J. Marti	Meet with E. Brache; discuss next steps with regards to Final Explanatory Brief of Pleadings.
07/04/17	0.10	E. Brache	Attention to A. Schoor's response to C. Soto's request.
07/06/17	0.30	E. Brache	Receive and review copy of Ammine's final pleadings filed before the corresponding tribunal.
07/12/17	0.20	E. Brache	Exchange emails with A. Juroe regarding wire transfers; instruct J. Marti.
07/14/17	1.10	C. Alvarez	Travel to and From the First Civil and Commercial Chamber of the Court of Appeals of the National District.
07/17/17	2.50	J. Marti	Work on final explanatory brief of pleadings; legal research in regarding local precedents.
07/18/17	7.10	E. Brache	Review and analyze Ammine's Final Brief of Pleadings, search and review and analyze legal framework cited by Ammine to support its arguments; exchange emails with C. Soto regarding T. Fates correspondence.
07/19/17	6.80	E. Brache	Continue reviewing and analyzing Ammine's Final Brief of Pleadings and cited legal framework; analyze possible counter arguments and research legal backup; work on template for Mr. Seaman's Final Brief of Pleadings and send to J. Marti so that he may draft his sections in brief template.
07/19/17	7.50	J. Marti	Work on final explanatory brief of pleadings regarding appeal claim against exequatur.
07/20/17	5.10	E. Brache	Work on Mr. Seaman's Final Explanatory Brief of Pleadings and continue conducting and analyzing legal research to support our counterarguments.
07/20/17	0.00	J. Marti	Work on final explanatory brief of pleadings regarding appeal claim against exequatur.
07/21/17	7.00	E. Brache	Continue drafting certain sections of Mr. Seaman's Final Explanatory Brief of Pleadings.
07/21/17	0.60	G. Forastieri	Travel to and from the First Room of the Civil and Commercial Chamber of the Court of Appeals in order to verify if a judgment on the case has been rendered; report to C. Soto.
07/21/17	7.30	J. Marti	Work on final version explanatory brief of pleadings regarding appeal claim against exequatur.
07/24/17	5.20	E. Brache	Continue drafting Final Explanatory Brief of Pleadings and conducting legal research in

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support of our counterarguments; discuss possible counterarguments and legal backup with J. Marti.

07/25/17	7.00	E. Brache	Continue drafting Final Explanatory Brief of Pleadings and conducting legal research in support of our counterarguments; follow up on our request to bank.
07/26/17	7.00	E. Brache	Continue drafting Final Explanatory Brief of Pleadings and conducting legal research in support of our counterarguments; discuss certain counterarguments with J. Marti; email T. Fates; receive, review and incorporate to argument.
07/26/17	7.90	J. Marti	Work on final explanatory brief of pleadings regarding appeal claim against exequatur.
07/26/17	0.30	C. Soto Hernandez	Review and respond with instructions, E. Brache's queries on certain additional arguments for final brief; review emails from client and E. Brache on same.
07/27/17	7.20	E. Brache	Continue drafting Final Explanatory Brief of Pleadings; receive J. Marti's sections of brief and incorporate in draft; review and revise entire draft of brief and work on format; send draft if brief to C. Soto for her review.
07/27/17	0.20	C. Soto Hernandez	Exchange of emails regarding final brief of pleadings.
07/28/17	0.20	E. Brache	Follow up on our request of wire transfer documents.
07/28/17	3.20	J. Marti	Work on final version explanatory brief of pleadings regarding appeal claim against exequatur.
07/28/17	0.50	C. Soto Hernandez	Discuss with E. Brache and J. Marti arguments for the final brief in accordance to information provided by client; review emails from client; exchange of emails.
07/31/17	2.00	E. Brache	Work on citations and footnotes of the arguments of the final brief of pleadings that I drafted and include citations and footnotes of the arguments J. Marti drafted and send latest version of the brief to C. Soto for her review; meet with C. Soto and discuss defenses in brief; conference call with bank.
07/31/17	0.30	C. Soto Hernandez	Meet with E. Brache discussing final brief.
08/01/17	2.10	C. Soto Hernandez	Revise final brief of pleadings.
08/02/17	0.20	E. Brache	Receive instructions from C. Soto to review article from Dominican newspaper on currency similar to Gemcoin for possible reference in final brief of pleadings and to write to A. Schoor noting that our time entry descriptions which refer to strategy have been uploaded with interim reports.
08/02/17	0.40	C. Soto Hernandez	Address pending matters vs current status of briefing; conference call.

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08/03/17	2.20	C. Soto Hernandez	Continue working on final explanatory brief of pleadings.
08/04/17	0.30	E. Brache	Exchange of emails with A. Schoor and C. Soto.
08/04/17	0.30	C. Soto Hernandez	Discuss status and pending tasks; exchange of emails.
08/07/17	0.80	E. Brache	Attention to A. Schoor's email; attention to T. Seaman's instructions; receive instructions from C. Soto.
08/08/17	2.60	E. Brache	Give instructions to law clerk to investigate before the newspaper; review fraud investigation; receive law clerks email with status of docket pertaining to Ammine's appeals claim.
08/08/17	0.60	I. Santoni	Consult with newspaper.
08/08/17	3.10	C. Soto Hernandez	Exchange of emails on pending tasks; revise final brief of pleadings and include additional defense arguments.
08/09/17	0.30	E. Brache	Review email exchanges between A. Schoor and C. Soto regarding certain arguments for final brief of pleadings and filing of final brief.
08/10/17	0.30	E. Brache	Attention to emails between C. Soto and A. Schoor re arguments in final brief of pleadings; call and email Scotiabank official to follow up on proof of transfer request from A. Juroe.
08/10/17	0.20	C. Soto Hernandez	Exchange of emails.
08/11/17	2.50	E. Brache	Coordinate conference call; conference call with bank; instruct law clerk to follow up on status of request made to local newspaper; prepare for and participate in conference call; update and send draft of cooperation request.
08/11/17	1.60	G. Forastieri	Travel to and from the First Room of the Civil and Commercial Chamber of the Court of Appeals to verify status; report to C. Soto.
08/14/17	0.30	E. Brache	Receive and review email from newspaper and report to C. Soto.
08/16/17	1.50	E. Brache	Exchange emails with C. Soto and law clerk; instruct law clerk; review email from bank and follow up on pending information from client.
08/16/17	1.50	C. Soto Hernandez	Continue working on the final brief of pleadings as per new information received from client.
08/18/17	0.50	E. Brache	Receive I. Santoni's report about research; confirm findings; report to C. Soto, I. Santoni and J. Marti.
08/21/17	0.60	E. Brache	Exchange emails with C. Soto; discuss with G. Forastieri status of docket corresponding to appeals claim filed by Ammine; discuss with C. Soto; exchange emails with Mr. Seaman.

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08/21/17	0.30	C. Soto Hernandez	Follow upon pending tasks.
08/25/17	1.20	G. Forastieri	Travel to and from the First Room of the Civil and Commercial Chamber of the Court of Appeal to verify status; report to C. Soto.
08/29/17	0.20	E. Brache	Email to the bank to follow up on request.
09/01/17	0.20	E. Brache	Review law clerk's report with status of docket corresponding to Ammine's appeals claim.
09/05/17	0.20	E. Brache	Discuss with C. Soto and email T. Seaman to follow up on request.
09/06/17	0.20	E. Brache	Review A. Schoor's emails re T. Seaman's deposition.
09/06/17	0.20	C. Soto Hernandez	Exchange of emails on pending tasks.
09/07/17	0.50	C. Soto Hernandez	Further analysis on T. Seaman' statements for inclusion on the brief; review email from T. Seaman.
09/08/17	0.60	E. Brache	Attention to email exchanges between A. Schoor, T. Fates and C. Soto re T. Seaman's deposition and receive instructions from C. Soto; review law clerks report.
09/08/17	1.10	G. Forastieri	Travel to and from the First Room of the Civil and Commercial Chamber of the Court of Appeals of the National District to verify status; report to C. Soto.
09/11/17	2.50	E. Brache	Review and analyze A. Schoor's explanation per C. Soto's request, work on argument; email A. Schoor with additional questions; follow up on request before the bank.
09/12/17	2.00	E. Brache	Review and analyze documents sent by the bank, discuss with C. Soto and reply with additional request; continue working on T. Seaman's deposition.
09/12/17	0.30	C. Soto Hernandez	Review further information from the bank; exchange of emails on same; review email from E. Brache to A. Schoor on T. Seaman's deposition.
09/13/17	0.60	E. Brache	Exchange emails with A. Schoor and review her comments; discuss with C. Soto and instruct J. Marti.
09/13/17	0.80	J. Marti	Assist E. Brache working on final arguments regarding deposition comments from T. Seaman to the Final Explanatory Brief of Pleadings.
09/13/17	0.30	C. Soto Hernandez	Review and analyze further explanations from A. Schoor; exchange of emails.
09/14/17	0.40	E. Brache	Review email exchanges between C. Soto and A. Schoor; attention to email from bank; discuss with C. Soto and review C. Soto's comments.

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09/14/17	0.30	C. Soto Hernandez	Review and respond email from the bank; discuss and exchange of emails with team on same; review report from E. Brache to client; exchange of emails with client on further issues .
09/15/17	0.30	E. Brache	Conference call with J. Marti regarding final brief and deposition argument vis a vis A. Schoor's comments; exchange emails with Scotiabank officials regarding our request and report to client.
09/18/17	1.20	G. Forastieri	Travel to and from the First Room of the Civil and Commercial Chamber of the Court of Appeal to verify status; report to C. Soto.
10/05/17	1.80	J. Marti	Review email from T. Seaman; review modified letter version of letter; execute a compare with first draft and apply comments.
10/05/17	0.50	C. Soto Hernandez	Exchange of emails on SEC letter; review draft; instruct J. Marti; revise comments included by J. Marti; discuss the same; send revised letter to client.
10/06/17	1.00	E. Brache	Discuss SEC letter with J. Marti and C. Soto; review draft email to T. Seaman prepared by J. Marti and report my comments; receive G. Forastieri's preliminary report on issuance of decision related to Ammine's appeal claim against the executatur, re view decision and reievew C Soto's report to client.
10/06/17	1.20	G. Forastieri	Travel to and from the First Room of the Civil and Commercial Chamber of the Court of Appeals to obtain court's decision; report to C. Soto.
10/06/17	0.50	C. Soto Hernandez	Address several matters and exchange of emails on decision rendered by the court of appeals; send preliminary report on the decision to client.
10/09/17	0.70	J. Marti	Prepare annexes for SEC letter; send annexes to T Seaman.
10/09/17	0.10	C. Soto Hernandez	Exchange of electronic communications on SEC letter.
10/12/17	0.10	C. Soto Hernandez	Exchange of emails on next steps.
10/16/17	0.30	J. Marti	Email exchange with A. Schoor.
10/16/17	0.10	C. Soto Hernandez	Exchange of emails.
10/31/17	0.30	E. Brache	Meet with C. Soto to discuss report to client regarding decision; give instructions to G. Forastieri to confirm if decision has been notified abroad, receive preliminary report from G. Forastieri and report to C. Soto.
10/31/17	1.30	G. Forastieri	Travel to and from the Civil Affairs Department of the General Attorney's Office to confirm if counterpart has filed any new documents and/or notifications regarding case; report to E.

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Brache.

10/31/17 0.90 C. Soto Hernandez Draft and send email to client with complete report of decision.

TOTAL HOURS FOR THIS MATTER: 150.20

TOTAL SERVICES: USD\$ 22,721.00

TIME SUMMARY

TIMEKEEPER	HOURLY RATE	HOURS	TOTAL
Carla Alvarez	75.00	4.80	360.00
Eugenia Brache	145.00	81.50	11,817.50
Gia Forastieri	75.00	8.20	615.00
Josue Marti	125.00	33.70	4,212.50
Isabella Santoni	75.00	0.60	45.00
Carolina Soto Hernandez	265.00	21.40	5,671.00
TOTAL SERVICES:		150.20	USD\$ 22,766.00

DISBURSEMENT SUMMARY

Miscellaneous	VENDOR: Santo Domingo - DOP Only INVOICE#: 76079_06252017 DATE: 6/25/2017	992.87
Printing/Duplicating - Outside	Cash Detail Santo Domingo 201706 - Tran Date 6/07/2017 - Inversiones Rune. S.R.L. - Traducción del ingles al español de documentos varios -Sort line 549 - DOP 47000 VENDOR: Santo Domingo - DOP Only INVOICE#: 76079_07252017 DATE: 7/25/2017	3.99
Public Notices	Cash Detail Santo Domingo 201707 - Tran Date 6/27/2017 - Take copies of the inventory of documents filed by the counterpart -Sort line 254 - DOP 189 VENDOR: Santo Domingo - DOP Only INVOICE#: 76079_06252017 DATE: 6/25/2017	25.35
Registration Fees	Cash Detail Santo Domingo 201706 - Tran Date 5/25/2017 - Hector Martín Suberví - Bailiff Act 245/17 -Sort line 413 - DOP 1200 VENDOR: Santo Domingo - DOP Only INVOICE#: 76079_08252017 DATE: 8/25/2017	4.03

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Cash Detail Santo Domingo 201708 - Tran Date 8/03/2017 - Court of Appeal of the National District - File a Certification Request - 1 receipt of RD\$ 30. 2 brown stamp of RD\$ 30. 2 red stamp of RD\$ 50 -Sort line 343 - DOP 190

Telephone

763.00

TOTAL DISBURSEMENTS:

USD\$ 1,789.24

MATTER TOTAL

TOTAL SERVICES:

USD\$ 22,766.00

TOTAL DISBURSEMENTS:

USD\$ 1,789.24

TOTAL AMOUNT DUE FOR THIS MATTER:

USD\$ 24,555.24