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10 Attorneys for Receiver
11 Thomas A. Seaman

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

15 SECURITIES AND EXCHANGE
COMMISSION,

16 Plaintiff,

17 v.

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

26 Defendants.

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

**TWENTY-EIGHTH INTERIM
APPLICATION AND FINAL
APPLICATION OF ALLEN
MATKINS LECK GAMBLE
MALLORY & NATSIS, LLP, FOR
PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES**

Date: June 17, 2024
Time: 9:00 a.m.
Ctrm: 850, 8th Floor
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-Eighth interim application for approval and payment of fees and
9 reimbursement of expenses and Final Fee Application to approve payment of the
10 20% of approved interim fees withheld from fee applications One through Twenty-
11 Eight ("Application"). This Final Application covers the period from October 1,
12 2023, through May 2, 2024 ("Twenty-Eighth Application Period"), and seeks
13 approval of \$36,198.00 in fees, and an order authorizing the Receiver to pay the fees
14 incurred, \$36,198.00 and 100% of the costs, \$8.00 ("Interim Fees"). In addition,
15 Allen Matkins requests that the Court approve payment to Allen Matkins of the 20%
16 withheld from the previously approved interim fee applications, which totals
17 \$364,846.59.

18 I. INTRODUCTION

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

24 The appointment orders confer broad duties, responsibilities, and powers on
25 the Receiver that are designed to allow him to secure, preserve, and protect the assets
26 of the Receivership Entities, investigate and recover sums transferred to third parties,
27 conduct a forensic accounting and analysis of the Receivership Entities' financial
28 transactions, review and analyze investor claims, and maximize the amount

1 ultimately available for distribution to investors. The appointment orders authorized
2 the Receiver to engage counsel to assist him in the performance of his duties. The
3 Receiver determined that experienced, qualified counsel was critical due to the size
4 and complexity of the receivership estate. Accordingly, the Receiver engaged Allen
5 Matkins to assist with ongoing legal issues facing the receivership estate.

6 This fee application should be read in conjunction with the Receiver's Final
7 Report and Accounting filed concurrently herewith, which describes in detail the
8 Receiver's and Allen Matkins' activities during the Twenty-Eighth Application
9 Period. This Application seeks interim approval and payment of \$36,198.00 in fees
10 for a total of 37.6 hours worked. The work performed is described task-by-task in
11 **Exhibit A** and is broken down into the following categories:

Matter	Hours	Amount
General Receivership	23.1	\$22,169.25
Reporting	1.5	\$1,451.25
Distribution	13.00	\$12,577.50
TOTAL	37.60	\$36,198.00

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18 As the Court knows, 20% of the total amount of each of Allen Matkins'
19 interim fee applications was held back and reserved by the Receiver pending the
20 Receiver and Allen Matkins concluding their work on the receivership. Since this is
21 the final fee application and the receivership is concluding, Allen Matkins requests to
22 be paid the 20% holdback, or \$364,846.59 (the "Holdback").

23 Since 2015, Allen Matkins has worked diligently and efficiently to assist the
24 Receiver with the legal issues and tasks facing the receivership estate, since the
25 inception of the receivership in 2015. The firm's work has been directed toward
26 helping the Receiver to marshal assets, preserve and protect the substantial value of
27 receivership estate assets, support the Receiver's work to monetize the assets, work
28 with the Receiver on claims and distribution matters, as well as addressing tax and

1 general administration of the receivership. During the Application Period, Allen
2 Matkins also provided support for the conclusion of the final distributions, and to
3 assist in distributing the proceeds to the investor claimants.

4 Accordingly, Allen Matkins requests the Court to approve this Application and
5 the payment of the final fee application and the Holdback.

6 **II. SUMMARY OF TASKS PERFORMED**
7 **DURING THE APPLICATION PERIOD**

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

9 **1. General Receivership**

10 Allen Matkins' work in this category concerned providing ongoing support to
11 the Receiver in preparations to conclude the receivership including but not limited to
12 providing advice as to final accounting and discharge issues. As part of this work,
13 Allen Matkins provided advice concerning state and federal tax matters. In addition,
14 Allen Matkins met with the Receiver to provide advice concerning the motions
15 required to close the receivership. Allen Matkins then prepared the closing motions,
16 memorandum of points and authorities and supporting declaration and reports. The
17 reasonable and necessary cost of the work in this category is \$22,169.25.

18 **2. Reporting**

19 Allen Matkins' work in this category consisted of providing legal support and
20 assistance to the Receiver with regard to the Receiver's reports and
21 recommendations. During this period, Allen Matkins drafted and edited portions of
22 the Receiver's reports. In addition, Allen Matkins assisted the Receiver in
23 developing a plan for the closing of the case following the completion of the second
24 distribution and conferring with the SEC regarding the final distribution and closing
25 of the receivership. The reasonable and necessary fees for work in this category is
26 \$1,451.25.

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1 **3. Distribution**

2 Allen Matkins' work in this category has focused upon supporting the
3 Receiver's final distribution to investors with allowed claims. Allen Matkins
4 responded to numerous inquiries from claimants seeking payment or disputing their
5 treatment under the approved distribution plan. Allen Matkins' work involved
6 providing information, distribution process and attending to efforts to correct claim
7 amounts, and/or other mistakes in distributions. Many of these issues arose in
8 connection with the many overseas claimants including but not limited to their
9 inability to cash checks or otherwise receive payment of their distribution.

10 Allen Matkins also provided advice regarding the corrective distributions to
11 investors with Allowed Claims. Allen Matkins assisted with evaluating evidence
12 concerning the alleged mistakes and advised Receiver on the plan to make the
13 distributions to claims who erroneously were not paid in prior distributions. The
14 reasonable and necessary fees for work in this category is \$12,577.50.

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

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

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

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

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

25 Allen Matkins has endeavored to staff matters as efficiently as possible while
26 remaining cognizant of the complexity of issues presented. During this 7 month
27 period, fees were less than \$5,500 per month. The request for fees is based on Allen
28

1 Matkins' customary billing rates charged for comparable services provided in other
2 matters, less a 10% discount.

3 The work performed by Allen Matkins over the 7 month Application Period
4 was essential to carrying out the Receiver's Court-ordered duties. Allen Matkins has
5 worked diligently to preserve and protect the assets of the receivership estate,
6 investigate and recover sums transferred to third parties, maximize the funds
7 available for ultimate distribution to investors and facilitate the distributions to the
8 investors with Allowed Claims.

9 Allen Matkins' fees are fair and reasonable and should be approved and paid.
10 Allen Matkins seeks payment of its fees incurred during the Twenty-Eighth
11 Application Period. In addition, since this is the final fee application, Allen Matkins
12 also requests payment of the 20% Holdback.

13 **IV. CONCLUSION**

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

- 15 1. Approving Allen Matkins' fees, for the basis, of \$36,198.00;
- 16 2. Authorizing and directing the Receiver to pay Allen Matkins 80% of
17 approved fees, of \$36,198.00, from the assets of the Receivership Entities;
- 18 3. Authorizing and directing the Receiver to pay Allen Matkins the
19 Holdback amount of \$364,846.59; and
- 20 4. For such other and further relief as the Court deems appropriate.

21
22 Dated: May 14, 2024

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

23
24
25 By: /s/ David R. Zaro
26 DAVID. R. ZARO
27 Attorneys for Receiver
28 THOMAS A. SEAMAN

EXHIBIT A

05/03/24 18:18:18 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: 01/17/24
 Proforma Number: 1274435

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		
10/10/23	9375935	Work on legal issues, and conference with the Receiver to address accounting and issues related to the hold/reserves required for case closure, taxes and follow-up.	Zaro, David	0.40	387.00	387.00	WO	HD	TR	_____
11/09/23	9412683	Work on issues with Receiver concerning tax returns/reserves and closing the case, timing of motions and follow-up.	Zaro, David	0.60	580.50	967.50	WO	HD	TR	_____
11/13/23	9414840	Work on the issues concerning tax returns, IRS/Franchise tax subordination and the scope, form of closing accounting.	Zaro, David	0.70	677.25	1,644.75	WO	HD	TR	_____
11/20/23	9422997	Review the order, call/email related to closing motion with the Receiver.	Zaro, David	0.50	483.75	2,128.50	WO	HD	TR	_____
01/05/24	9470429	Work on the issues related to closing tasks, accounting and report in preparation for the closing motions and follow-up with Receiver.	Zaro, David	1.10	1,064.25	3,192.75	WO	HD	TR	_____
01/12/24	9478411	Follow-up with counsel and Receiver related to the closing motion, discharge motion/prospective carveout for claims and then prepare outline of closing motions.	Zaro, David	1.60	1,548.00	4,740.75	WO	HD	TR	_____

05/03/24 18:18:18 PROFORMA STATEMENT FOR MATTER 375323.00002 (Thomas A. Seaman, Receiver for US Fine I) (General Receivership)

Fees for Matter 375323.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/16/24	9479684	Respond to inquiries from counsel for Wei He regarding unfreezing of Chase bank account pursuant to settlement agreement	Fates, Edward (Ted)	0.40	297.00	5,037.75	WO	HD	TR	_____
01/18/24	9484760	Research/analysis of the closing motions, address legal issues as to remedial payments to claimants and follow-up calls with Receiver counsel.	Zaro, David	1.70	1,644.75	6,682.50	WO	HD	TR	_____
01/24/24	9490759	Several conferences with counsel related to the closing motions, discharge and tax matters.	Zaro, David	0.40	387.00	7,069.50	WO	HD	TR	_____
01/29/24	9495734	Address status of receiver final accounting, report and final distribution (.3). Call related to final tax returns QSF/closing of the case (.3).	Zaro, David	0.60	580.50	7,650.00	WO	HD	TR	_____
01/30/24	9494989	Communications with counsel for Wei He regarding frozen account at Chase bank and requests relating to same	Fates, Edward (Ted)	0.40	297.00	7,947.00	WO	HD	TR	_____
01/30/24	9496671	Work on the draft of the motion to conclude the case/memorandum of points and authorities including research related to discharge of receiver.	Zaro, David	1.80	1,741.50	9,688.50	WO	HD	TR	_____
02/05/24	9506253	Call with Receiver and confer related to the tax issues related to closing including QSF (.4). Address accounting use of reserves and proceeds to pay claimant and adjust allowed claim, follow-up (.9).	Zaro, David	1.30	1,257.75	10,946.25	WO	HD	TR	_____
02/12/24	9513047	Follow-up on the final tax returns/timing issues related to QSF and call with counsel.	Zaro, David	0.40	387.00	11,333.25	WO	HD	TR	_____

05/03/24 18:18:18 PROFORMA STATEMENT FOR MATTER 375323.00002 (Thomas A. Seaman, Receiver for US Fine I) (General Receivership)

Fees for Matter 375323.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
04/16/24	9590548	Work on closing tasks, address the outline of closing motion, discharge issue and follow-up (.5). Call with the Receiver related to the closing motion/discharge (.2).	Zaro, David	0.70	677.25	12,010.50	WO	HD	TR	_____
04/23/24	9599203	Conference with counsel related to the closing and evaluate tax matters, timing, set aside for returns and follow-up.	Zaro, David	0.40	387.00	12,397.50	WO	HD	TR	_____
04/26/24	9601575	Evaluate Court's Minute Order and call/email with Receiver, address closing of receivership.	Zaro, David	0.40	387.00	12,784.50	WO	HD	TR	_____
04/29/24	9604207	Research, analysis and then draft the memorandum of points and authorities to support the closing motions (.2). Draft the notice of motion and motion, transmit to Receiver via email (.4). Work on final application for Receiver and counsel (.3).	Zaro, David	3.90	3,773.25	16,557.75	WO	HD	TR	_____
04/30/24	9605229	Further research, revise draft of the memo of points and authorities in support of closing report and motions/applications (1.7). Call with Receiver related to the closing motions and follow-up (.2).	Zaro, David	1.90	1,838.25	18,396.00	WO	HD	TR	_____
05/01/24	9609770	Research, revise draft briefs and declaration for Receiver, follow-up emails (1.4). Further revise Receiver declaration and points and authorities (1.1). Follow-up calls with Receiver, emails related to the report/closing motions (.6).	Zaro, David	3.10	2,999.25	21,395.25	WO	HD	TR	_____
05/02/24	9610439	Follow-up on issues related to Receiver report, SEC meet/confer and call with Receiver (.3). Cals with Receiver and	Zaro, David	0.80	774.00	22,169.25	WO	HD	TR	_____

05/03/24 18:18:18 PROFORMA STATEMENT FOR MATTER 375323.00002 (Thomas A. Seaman, Receiver for US Fine I) (General Receivership)

Fees for Matter 375323.00002.(General Receivership)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle Action
		counsel to address report, closing accounting and related issues (.5).					

Disbursements for Matter 375323.00002 (General Receivership)

Trans Date	Index	Type	Quantity	Amt	WO	HD	TR
12/04/23	2869406	DCSRCH – Document Search - PACER - Usage 4th QTR	0.00	8.60			

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	22.30	967.50	21,575.25
001665	Fates, Edward (Ted)	0.80	742.50	594.00
		<u>23.10</u>		<u>\$22,169.25</u>
Subtotal Fees				\$22,169.25
Discount				0.00
Total Fees				22,169.25
Total Disbursements				8.60

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 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .15; zaro @ 895.50 until 7/31/23

Account Summary – As Of 05/03/24

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

05/03/24 18:18:18 PROFORMA STATEMENT FOR MATTER 375323.00002 (Thomas A. Seaman, Receiver for US Fine I) (General Receivership)

Worked	22,930.10	22,846.50	83.60	20,040.75	20,040.75	0.00	223,256.39	189,055.35	34,201.04
Unbilled Adj	50.40	50.40	0.00	0.00	0.00	0.00	1,369.02	433.62	935.40
Billed	10,255.45	10,208.70	46.75	10,255.45	10,208.70	46.75	165,748.77	165,748.77	34,192.44
Collected	10,255.45	10,208.70	46.75	10,255.45	10,208.70	46.75	199,941.21	165,748.77	34,192.44
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP Balance	22,189.65	22,169.25	20.40						
AR Balance	0.00	0.00	0.00						
Unalloc Payment	0.00								
Client Trust Balance	0.00								

Billing Address

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

05/03/24 18:18:19 PROFORMA STATEMENT FOR MATTER 375323.00004 (Thomas A. Seaman, Receiver for US Fine I) (Reporting)

Preliminary Billing Form

Billing Atty: 000313 - Zaro, David Matter #: 375323.00004 Client Name: Thomas A. Seaman, Receiver for US Fine I
 Date of Last Billing: 01/17/24 Matter Name: Reporting
 Proforma Number: 1274435
 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	
11/28/23	9430953	Work on the draft of Receiver's report, revise and finalize same (.5). Call with Receiver, email to the SEC counsel to meet and confer related to the report (.6).	Zaro, David	1.10	1,064.25	1,064.25	WO	HD	TR
12/04/23	9439817	Finalize Receiver's Report, follow-up concerning investor communications.	Zaro, David	0.40	387.00	1,451.25	WO	HD	TR

Proforma Summary

Timekeeper Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	1.50	967.50	1,451.25
		1.50		\$1,451.25
Subtotal Fees				\$1,451.25
Discount				0.00
Total Fees				1,451.25
Total Disbursements				0.00

Attorney Billing Instructions

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

05/03/24 18:18:19 PROFORMA STATEMENT FOR MATTER 375323.00004 (Thomas A. Seaman, Receiver for US Fine I) (Reporting)

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .15; zaro @ 895.50 until 7/31/23

Account Summary – As Of 05/03/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	1,809.45	1,809.45	0.00	0.00	0.00	0.00	109,685.70	109,683.90	1.80
Unbilled Adj	0.00	0.00	0.00	0.00	0.00	0.00	5,418.60	5,418.60	0.00
Billed	14,342.40	14,340.60	1.80	14,342.40	14,340.60	1.80	102,057.39	102,057.39	1.80
Collected	14,342.40	14,340.60	1.80	14,342.40	14,340.60	1.80	102,059.19	102,057.39	1.80
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Total	Fees	Costs						
WIP	1,451.25	1,451.25	0.00						
Balance									
AR Balance	0.00	0.00	0.00						
Unalloc	0.00								
Payment									
Client Trust	0.00								
Balance									

Billing Address

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

05/03/24 18:18:20 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: 01/17/24 Matter Name: Distribution
 Proforma Number: 1274435
 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		
10/03/23	9366827	Call with Receiver and counsel related to the second distribution and follow-up.	Zaro, David	0.40	387.00	387.00	WO	HD	TR	_____
10/09/23	9373791	Work on the issues related to the second distribution with Receiver, address the timing, notice to investors and follow-up.	Zaro, David	0.60	580.50	967.50	WO	HD	TR	_____
10/10/23	9375947	Follow-up with the Receiver concerning the second distribution, issues related to resume the distribution (.4). Follow-up to review plan terms and follow-up with Receiver (.2).	Zaro, David	0.60	580.50	1,548.00	WO	HD	TR	_____
10/12/23	9379039	Several emails/calls with Receiver related to the distribution issues, accounting and follow-up.	Zaro, David	0.60	580.50	2,128.50	WO	HD	TR	_____
10/19/23	9387480	Follow-up on second distribution with counsel and call with claimant related to the distribution.	Zaro, David	0.40	387.00	2,515.50	WO	HD	TR	_____
10/31/23	9399763	Several conferences related to the Receiver's second distribution, timing and follow-up.	Zaro, David	0.40	387.00	2,902.50	WO	HD	TR	_____

05/03/24 18:18:20 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

Fees for Matter 375323.00010.(Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
11/06/23	9406510	Call related to distribution with the Receiver and follow-up thereon to assess the issues related to wire transfers (.2). Call with investor concerning second distribution, and follow-up (.2). Work on the issues concerning taxes, overseas investors, wire transfers and outline the closing motions (1.2).	Zaro, David	1.60	1,548.00	4,450.50	WO	HD	TR	_____
11/09/23	9412687	Several calls with investors and counsel related to the receivership's second distribution (.3). Follow-up with Receiver concerning timing of distributions and progress/notice (.3).	Zaro, David	0.60	580.50	5,031.00	WO	HD	TR	_____
11/13/23	9414842	Call related to the second distribution from claimant, follow-up.	Zaro, David	0.30	290.25	5,321.25	WO	HD	TR	_____
11/21/23	9426385	Several calls related to second distribution and evaluation open issues related to check/wire processing.	Zaro, David	0.60	580.50	5,901.75	WO	HD	TR	_____
12/08/23	9442705	Several conferences with creditors and counsel related to distributions and returns/timing issues (.4). Call with the Receiver related to the second distribution issues (.6).	Zaro, David	1.00	967.50	6,869.25	WO	HD	TR	_____
01/05/24	9470424	Several calls related to claimants and final distribution, follow-up prospective additional corrective distributions.	Zaro, David	0.70	677.25	7,546.50	WO	HD	TR	_____
01/11/24	9475811	Several conferences with regard to distributions the conclusion-stop payments and prospective corrective payments.	Zaro, David	0.40	387.00	7,933.50	WO	HD	TR	_____

05/03/24 18:18:20 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

Fees for Matter 375323.00010.(Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action		
01/12/24	9478404	Conference with counsel and with claimant related to closing of the distribution process, stop payment question.	Zaro, David	0.40	387.00	8,320.50	WO	HD	TR	_____
01/17/24	9483095	Call with Receiver concerning remaining distribution issues, closing of distribution and follow-up.	Zaro, David	0.30	290.25	8,610.75	WO	HD	TR	_____
02/06/24	9506283	Evaluate the issues related to corrective distribution and work on draft motion to permit additional distribution (.8). Follow-up with counsel related to records destruction (.3).	Zaro, David	1.10	1,064.25	9,675.00	WO	HD	TR	_____
02/13/24	9514184	Several calls with Receiver, investors and counsel, emails concerning the distribution status.	Zaro, David	0.40	387.00	10,062.00	WO	HD	TR	_____
03/08/24	9544434	Emails and call related to the final distribution and several efforts re: investor payments (.3). Call with Receiver related to stop payment/closing tasks (.1).	Zaro, David	0.40	387.00	10,449.00	WO	HD	TR	_____
03/13/24	9551424	Follow-up on remaining/outstanding distributions with Receiver and counsel, address stop payment issues and call with counsel.	Zaro, David	0.80	774.00	11,223.00	WO	HD	TR	_____
04/04/24	9578086	Calls with Receiver and claimant related to final distribution, corrective action re: prior claims.	Zaro, David	0.40	387.00	11,610.00	WO	HD	TR	_____
04/16/24	9590545	Review distribution plan and order, then call with the Receiver related to the corrective payments.	Zaro, David	0.60	580.50	12,190.50	WO	HD	TR	_____

05/03/24 18:18:20 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

Fees for Matter 375323.00010.(Distribution)

Trans Date	Index	Description of Service Rendered	Timekeeper	Hours	Fees	Sum	Circle	Action
04/29/24	9604203	Call with Receiver related to corrective distribution and final issues, follow-up.	Zaro, David	0.40	387.00	12,577.50	WO	HD TR

Proforma Summary

Timekeeper

Number	Timekeeper	Hours	Rate	Amounts
000313	Zaro, David	13.00	967.50	12,577.50
		13.00		\$12,577.50
Subtotal Fees				\$12,577.50
Discount				0.00
Total Fees				12,577.50
Total Disbursements				0.00

Attorney Billing Instructions

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

Billing Instructions

expires 6/30/2024: 10% off standard rates (automatic); no text editing; copies @ .15; zaro @ 895.50 until 7/31/23

Account Summary – As Of 05/03/24

	Fiscal YTD			Calendar YTD			LTD		
	Total	Fees	Disb.	Total	Fees	Disb.	Total	Fees	Disbursements
Worked	24,155.10	24,155.10	0.00	5,708.25	5,708.25	0.00	127,490.35	127,483.65	6.70
Unbilled Adj	155.34	155.34	0.00	0.00	0.00	0.00	1,242.86	1,242.86	0.00
Billed	55,318.73	55,318.73	0.00	55,318.73	55,318.73	0.00	113,725.13	113,725.13	6.70
Collected	55,318.73	55,318.73	0.00	55,318.73	55,318.73	0.00	113,731.83	113,725.13	6.70
AR Write Off	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total		Fees	Costs						

05/03/24 18:18:20 PROFORMA STATEMENT FOR MATTER 375323.00010 (Thomas A. Seaman, Receiver for US Fine I) (Distribution)

<i>WIP</i>	<i>12,577.50</i>	<i>12,577.50</i>	<i>0.00</i>
<i>Balance</i>			
<i>AR Balance</i>	<i>0.00</i>	<i>0.00</i>	<i>0.00</i>
<i>Unalloc</i>	<i>0.00</i>		
<i>Payment</i>			
<i>Client Trust</i>	<i>0.00</i>		
<i>Balance</i>			

Billing Address

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